2023

GHEITI Oil and Gas Report

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For copies of the 2023 Oil and Gas Report, please contact the GHEITI National Coordinator at:

Ministry of Finance
Ghana Extractive Industries Transparency Initiatives Secretariat
New Building, Third Floor, Room 305
P. O. Box MB 40
Accra – Ghana

The 2023 Oil and Gas Report is also available on the internet at: //www.gheiti.gov.gh/site/

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LIST OF ACRONYMS AND ABBREVIATIONS

Acronym	Definition
AFS	Annual Financial Statement
ASM	Artisanal and Small-Scale Mining
AU	African Union
BECE	Basic Education Certificate Examination
BO	Beneficial Ownership
CHPS	Community Health Planning and Services
CMS	Community Mining Scheme
CSI	Corporate Social Investment
CSO	Civil Society Organisation
CSPOG	Civil Society Platform for Oil & Gas
CSR	Corporate Social Responsibility
DCD	District Coordinating Officer
DCE	District Chief Executive
DFO	District Finance Officer
DPO	District Planning Officer
DTRD	Domestic Tax Revenue Division
EAP	Environmental Action Plan
EIA	Environmental Impact Assessment
EIS	Environmental Impact Statement
EITI	Extractive Industries Transparency Initiative
EMP	Environmental Management Plan
EPA	Environmental Protection Agency
ESTMA	Extractive Sector Transparency Measures Act
FC	Forestry Commission
FGR	Future Global Resources
FSD	Forest Services Division
FY	Full Year
GBC	Ghana Bauxite Company Limited
GCM	Ghana Chamber of Mines
GDP	Gross Domestic Product
GETFund	Ghana Education Trust Fund
GGSA	Ghana Geological Survey Authority
GHEITI	Ghana Extractive Industries Transparency Initiative
GHS	Ghana Cedis
GIADEC	Ghana Integrated Aluminium Development Corporation
GIIF	Ghana Infrastructure Investment Fund

GIISDEC	Ghana Integrated Iron and Steel Development Corporation
GIPC	Ghana Investment Promotion Corporation
GMC	Ghana Manganese Company Limited
GNASSM	Ghana National Association of Small- Scale Miners
GNPC	Ghana National Petroleum Corporation
GRA	Ghana Revenue Authority
GRI	Global Reporting Initiative
GRM	Grievance Redress Mechanism
GSR	Golden Star Resources
IA	Independent Administrator
ICT	Information Communication Technology
ICUMS	Integrated Customs Management System
IDMC	Inspectorate Division of the Minerals Commission
IFEJ	Institute of Financial and Economic Journalists
IFRS	International Financial Reporting System
IGF	Internally Generated Funds
ISSAI	International Standards of Supreme Audit Institutions
JHS	Junior High School
JV	Joint Venture
JVC	Joint Venture Company
KG	Kindergarten
KM	Kilometer
KPCS	Kimberley Process Certification Scheme
LG	Liaison Group
LGEC	Licensed Gold Exporting Companies
LI	Legislative Instrument
LIBOR	London Interbank Offer Rate
LMC	Local Management Committee
LME	London Metal Exchange
MC	Minerals Commission
MCAS	Mining Cadastre
MCDS	Mining Community Development Scheme
MCE	Municipal Chief Executive
MDF	Minerals Development Fund
MIIF	Mineral Income Investment Fund
MLGDRD	Ministry of Local Government, Decentralisation and Rural Development
MLNR	Ministry of Lands and Natural Resource
MMDA	Metropolitan, Municipal and District Assemblies

MOF	Ministry of Finance
MOU	Memorandum of Understanding
MPSA	Master Project Support Agreement
MRE	Mineral Resource Estimation
MSG	Multi-Stakeholder Group
MT	Metric Tonnes
NFSL	National Fiscal Stabilization Levy
NHIL	National Health Insurance Levy
NPA	National Petroleum Authority
NTPU	Non-Tax Policy Unit
NYSE	New York Stock Exchange
OASL	Office of Administrator of Stool Lands
OEP	Opening Extractive Programme
OO	Open Ownership
PAYE	Pay As You Earn
PEA	Preliminary Environmental Assessment
PEP	Politically Exposed Person
PFM	Public Financial Management
PIAC	Public Interest and Accountability Committee
PJL	PMMC Jewellery Ltd
PMMC	Precious Minerals Marketing Company
PPE	Personal Protective Equipment
PV	Payment Voucher
PWD	Person With Disability
PWYP	Publish What You Pay
QFE	Quasi Fiscal Expenditure
RPD	Revenue Policy Division
SHS	Senior High School
SIGA	State Interest and Governance Authority
SOE	State Owned Enterprise
TIN	Tax Identification Number
TNMA	Tarkwa Nsuaem Municipal Assembly
TRC	Technical Review Committee
UBA	United Bank for Africa
UDWDA	Upper Denkyira West District Assembly
USD	US Dollar
VALCO	Volta Aluminium Company Limited
VAT	Value Added Tax
WAEDA	Wassa Amenfi East District Assembly

EXECUTIVE SUMMARY

Ghana's oil and gas sector experienced a challenging period of transition in 2023, characterised by declining production levels, reduced revenues, and ongoing governance constraints. Although the transparency and accountability framework under the Ghana Extractive Industries Transparency Initiative (GHEITI) remained strong, sector performance weakened as the Jubilee, TEN, and Sankofa-Gye Nyame (SGN) fields matured. Crude oil production declined by 6.7% to 48.2 million barrels, and the combined effect of lower output and softer global prices resulted in a 25.65% drop in petroleum revenues to USD 1.062 billion. Consequently, the sector's contribution to total government revenue fell to 9.35%, intensifying fiscal pressures.

In this challenging context, GHEITI's oversight role proved critical. The Multi-Stakeholder Group (MSG) achieved 98% reconciliation coverage with minimal discrepancies and played an active role in policy oversight, such as conducting corruption risk assessments and making key policy recommendations, including a proposal to the government to follow due process in the reassignment of the gas aggregator role. Some governance gaps still remain. The MSG itself reflects a broader inclusivity challenge, with women occupying only 27% of its membership. More critically, structural weaknesses emerged around state participation and institutional clarity. GNPC and its subsidiary Explorco have not paid corporate income tax on revenues from their 7% interest in Jubilee and TEN since 2021, largely due to non-adherence to ring-fencing provisions, resulting in foregone public revenues. In another breath, unresolved overlap between GNPC and Ghana Gas over the national gas aggregator role continues to create regulatory uncertainty and investor risk.

Environmental and energy transition issues also shaped the sector's outlook. While Ghana is strengthening its regulatory framework and advancing a broader green transition agenda, signalled by the rebranding of the Energy Ministry, operational challenges such as gas flaring due to technical failures persisted, attracting significant administrative penalties. As Ghana balances hydrocarbon management with long-term decarbonisation goals, restoring investor confidence in the oil and gas sector remains an immediate priority. This will require resolving fiscal and institutional ambiguities, ensuring GNPC's tax compliance, clarifying gas aggregation responsibilities, and making transparent, strategic decisions on the use of petroleum savings.

Overall, the 2023 report presents a sector at crossroads: transparency systems are functioning effectively, but the insights they generate underscore the urgent need for decisive governance reforms to stabilise the sector and safeguard Ghana's long-term economic and intergenerational interests.

SECTION ONE: OVERSIGHT BY THE MULTI-STAKEHOLDER GROUP

Background

The Government of Ghana continued to demonstrate its commitment to good extractive industry governance in 2023 by continuing to implement the Extractive Industries Transparency Initiative (EITI) and using it as a tool for diagnosing and undertaking required reforms in the extractive sector.

The EITI was founded on the principles of transparency, accountability, and citizens' participation in resource governance. Its fundamental requirement is the public disclosure of companies' payments and government's receipts. These payments and receipts are subjected to reconciliation by an Independent Administrator (IA), and where discrepancies are identified, steps are taken to account for their occurrence. The initiative has evolved over the years to cover emerging issues such as commodity trading, illicit financial flows, corruption, Environmental, Social and Governance (ESG), gender and inclusivity, company cost profiling, and Energy Transition.

EITI implementation ensures meaningful CSO participation by enabling CSOs to observe the disclosure processes and use the resulting data from the disclosures to interrogate national and sub-national level policy decisions, advocate for accountability, and demand reforms that will improve the economic and social benefits of resource extraction. Civil society participation in Ghana's EITI implementation is supported by an enabling environment that allows stakeholders to engage freely, actively, and effectively, without restraint, coercion or reprisal.

1.1 Government Engagement

The Government of Ghana in 2023 continued to demonstrate its commitment to its EITI implementation by providing budgetary resources for the compilation and dissemination of GHEITI's reports. The EITI Champion in 2023, who also happened to be the Minister for Finance intervened personally to ensure that funds required for the compilation of the report were made available to the secretariat, and in good time. He also convened a meeting with the MSG and the management of the Ghana National Oil Company (GNPC) to discuss some EITI implementation challenges, particularly the refusal of GNPC to disclose the Litasco oil lifting contract. The meeting was chaired by the divisional director, who hosted the GHEITI Secretariat, as the Minister had to excuse himself to attend to an equally important assignment at the presidency. The GHEITI Champion's intervention led to the securing of GNPC's consent for the disclosure of the Litasco contract. Government representatives participated regularly in sub-national MSG meetings in 2023 and facilitated coordination across MDAs to support effective EITI implementation.

In compiling this report, GHEITI enjoyed both financial and non-financial support from the Ministry of Finance including the presence of the Coordinating Director who co-chaired the validation meeting of this report.

During the reporting year, GHEITI engaged with the various institutions affected by GHEITI's findings and recommendations to assess the progress of implementation of the recommendations. The report of the meeting between GHEITI and the MDAs on implementation of GHEITI's recommendation can be accessed via the link[1].

[1] https://www.gheiti.gov.gh/site/index.php?option=com_phocadownload&view=sections&Itemid=54

1.2 Company Engagement

There are no barriers, legal, administrative, or whatsoever, to the effective participation of extractive industry companies in Ghana's EITI processes. Oil and Gas companies participating in the Ghana EITI are represented on the MSG by the industry association namely: the Ghana Upstream Petroleum Chamber; the three oil producing companies (Tullow Ghana Limited, Kosmos Energy Ghana and Eni Ghana Exploration and Production Limited); and two State Owned Enterprises (SOEs) comprising Ghana National Petroleum Company (GNPC) and Ghana Gas Company limited (GNGLC).

1.2.1 Companies' Anti-Corruption Policies / Measures

Most of the Oil and Gas companies participating in the 2023 EITI reporting adhere to high ethical standards. Table 1 provides details of the anti-corruption policies and measures in force within the participating companies including State Owned Enterprises (SOEs), during the year under review.

Table 1.1 : Company's Anticorruption Policies

COMPANY	ANTI-CORRUPTION POLICIES	ACCESS LINK
Tullow Ghana Limited	Code of Ethical Conduct ESG Investors	https://www.tullowoil.com/application/files/8616/8448/0239/2021_Tullow_Oil_Code_of_Ethical_Conduct.pdf https://www.tullowoil.com/investors/esg-investors/
Kosmos Energy Ghana HC **Kosmos Energy Ghana Investment**	Anti-Corruption Compliance Policy Business Ethics	https://share.google/fFBHZ3dnB0bo3x5CH https://www.kosmosenergy.com/business-ethics/
ENI	Anti-Corruption Compliance Programme Code of Ethics	https://www.eni.com/en-IT/governance/controls-and-risks/anti-corruption.html https://www.eni.com/en-IT/governance/rules/code-of-ethics.html
Vitol (Not represented on the MSG)	No publicly accessible policy statement on Anti-Corruption	
Petro SA (Not represented on the MSG)	Anti-Bribery and Anti-Corruption Policy	https://procurement.petrosa.com/iss_prd/Anti-Briberypercent20andpercent20Anti-Corruptionpercent20Policy.pdf

COMPANY	ANTI-CORRUPTION POLICIES	ACCESS LINK
GNPC	No publicly accessible policy statement on Anti-Corruption	Code of Conduct and Business Ethics - https://www.gheiti.gov.gh/site/index.php?option=com_phocadownload&view=category&download=561:code-of-conduct-and-business-ethics&id=15:implementation-reports&Itemid=54 Anti-Bribery and Anti-Corruption Policy - https://www.gheiti.gov.gh/site/index.php?option=com_phocadownload&view=category&download=562:anti-bribery-and-anti-corruption-policy&id=15:implementation-reports&Itemid=54
Ghana Gas Limited Company	No publicly accessible policy statement on Anti-Corruption	Code of Conduct and Business Ethics - https://www.gheiti.gov.gh/site/index.php?option=com_phocadownload&view=category&download=561:code-of-conduct-and-business-ethics&id=15:implementation-reports&Itemid=54 Anti-Bribery and Anti-Corruption Policy - https://www.gheiti.gov.gh/site/index.php?option=com_phocadownload&view=category&download=562:anti-bribery-and-anti-corruption-policy&id=15:implementation-reports&Itemid=54

Source: GHEITI’s construct according to information from company’s website

The MSG reviewed this information to identify governance gaps, particularly among SOEs, and to inform follow-up engagement and recommendations aimed at strengthening integrity systems in the extractive sector.

1.3 Civil Society Engagement

Civil Society Organisations (CSOs) in Ghana are fully engaged in Ghana's EITI implementation. They are represented by Publish What You Pay (PWYP) Ghana, (a coalition of over 30 organisations), and by the Civil Society Platform on Oil and Gas (CSPOG) (a coalition of over 50 organisations and 200 individuals). Both coalitions operate a decentralised governance structure, with PWYP Ghana having local chapters in four of the country's mining zones, and CSPOG having local chapters in 10 out of the 16 regions of Ghana. The CSOs have three representations on the GHEITI MSG, one for PWYP-Ghana, and two for CSPOG. .

The revised GHEITI Rules of Procedure provides guidance on the process for the nomination of the Civil Society representatives. The rules uphold the independence of the constituency and of the nomination process.

One of the Civil Society representatives serves as the Co-Chair of the MSG, alongside the Chief Director of the Ministry of Finance.

1.4 Multi-Stakeholder Group

The Ghana EITI (GHEITI) is governed by a Multi-Stakeholder Group (MSG) drawn from government agencies in the extractive sector, companies, and civil society groups. The MSG is an independent body that oversees EITI implementation in Ghana. Its activities are guided by a Rules of Procedure (revised in 2024). It provides policy direction, approves work plans and budgets for the Secretariat (the operational arm of GHEITI).

The MSG's decision-making has always been by consensus. Though the revised GHEITI Rules of Procedure provide for voting, the provision has never been invoked in the over two decades of the MSG's existence. This has, over the years fostered a spirit of co-operation and mutual respect for the views of the various constituencies. The revised Rules of Procedure can be accessed via the link[2]

1.4.1 Gender Make-up of the GHEITI MSG and Secretariat

As of 2023, the GHEITI Multi-Stakeholder Group (MSG) comprises of seven females and nineteen males, representing 27 percent and 73 percent, respectively. This reflects a three-percentage-point improvement in female representation. On the civil society side, two of the three allocated slots are occupied by women.

The MSG's gender strategy, which mandates that alternates for male representatives should preferably be female, has yielded moderate results, two women were nominated as alternates compared to six men.

The GHEITI Secretariat in 2023 comprised three staff members, one female and two males, representing 33 percent and 67 percent respectively, in addition to one male National Service Person. In total, the GHEITI governance structure, excluding political leadership, consisted of 30 people: 22 males (73 percent) and 8 females (27 percent).

By 2025, the MSG had expanded to 37 members as a result of the inclusion of the minerals sector's sovereign wealth fund, Minerals Income Investment Fund (MIIF), and the bulk mineral-producing

[2] Rules Of Procedure For The Ghana Extractive Industries Transparency Initiative (GHEITI) Multi-Stakeholder Group (MSG)

parastatals, such as the Ghana Integrated Aluminium Development Corporation (GIADEC), the Ghana Integrated Iron and Steel Development Corporation (GIISDEC). The membership included nine females (24 percent) and twenty-eight males (76 percent). Of these, eight served as alternates, comprising two females (25 percent) and six males (75 percent). Although the absolute number of women increased by two compared to 2023, their overall percentage declined slightly due to the expanded size of the MSG.

As of 2025, the GHEITI Secretariat had four staff members, one male (33 percent) and three females (67 percent), along with one female graduate intern. Overall, the GHEITI governance structure, excluding political leadership, consisted of 42 members: 31 males (73 percent) and 11 females (27percent). The MSG membership list can be accessed via the link[3].

1.4.2 The MSG's Consideration of Good Governance and how it ensures that EITI Strengthens Anti-Corruption Efforts

The GHEITI MSG has consistently played the role of an arbiter anytime there's a public controversy relating to a policy decision in Ghana's extractive industry. A classic illustration of how the MSG plays this role was when with the support of the EITI International Secretariat, it undertook a revenue modelling exercise that confirmed that Ghana's gold reserves which formed the basis of a planned London Stock Exchange transaction were under-valued. The modelling relied on gold production and revenue data gleaned from GHEITI's reconciliation reports. The confirmation strengthened the hand of Ghana's Civil Society in their advocacy against the policy and led to its reversal.

Furthermore, following the introduction of the Gold for Oil (G4O) programme, a barter arrangement involving the exchange of gold for petroleum products by the Ghanaian government in 2022, the GHEITI MSG in its report published in 2023, covering 2021 – 2022, undertook a corruption risk assessment of the policy. The MSG concluded that the policy implementation lacked transparency. It then proceeded to demand the disclosure of the policy document underpinning the programme, how the programme is being financed, especially as there was no budgetary provision for the purchase of gold locally. The MSG also demanded the disclosure of the intermediaries who facilitated the exchange of the commodities, as well as the pricing formula used in the transaction i.e. whether spot or futures. Following are links to media reportage confirming GHEITI's role in averting corruption: https://www.myjoyonline.com/parliament-must-probe-gold-for-oil-programme-extractive-industry-transparency-initiative/

https://www.ghanaweb.com/GhanaHomePage/business/Gold-for-Oil-We-need-to-fight-against-associated -corruption-risks-ndash-GhEITI-1707266

Though the government failed to respond to the demands, a subsequent IMF evaluation of the programme recommended that the government backed out of it.

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[3] https://www.gheiti.gov.gh/site/index.php?option=com_content&view=article&id=256&Itemid=59

financed, especially as there was no budgetary provision for the purchase of gold locally. The MSG also demanded the disclosure of the intermediaries who facilitated the exchange of the commodities, as well as the pricing formula used in the transaction i.e. whether spot or futures. Following are links to media reportage confirming GHEITI's role in averting corruption: https://www.myjoyonline.com/parliament-must-probe-gold-for-oil-programme-extractive-industry-transparency-initiative/

https://www.ghanaweb.com/GhanaHomePage/business/Gold-for-Oil-We-need-to-fight-against-associated -corruption-risks-ndash-GhEITI-1707266

Though the government failed to respond to the demands, a subsequent IMF evaluation of the programme recommended that the government backed out of it.

1.5 Work Plan, Monitoring and Review

The GHEITI work Plan for 2023 was finalised and adopted at the 2022 Annual Retreat, held in the second week of January, 2023. Participation in the planning process involved the MSG, sub-national stakeholders from Ellembelle, Prestea Huni Valley, and Obuasi, which are all resource host districts. In attendance were representatives of the media, Development Partners, including NRGI and GIZ. The annual work plan is published on the GHEITI website (link[4])

Activities in GHEITI's 2023 Work Plan that support the MSG's commitment to using the EITI to mitigate or combat corruption risks in Ghana's extractive industry are:

1. Meetings convened by GHEITI with the Office of the Registrar of Companies (ORC), Minerals Commission, and Petroleum Commission to encourage the two extractive sector regulatory bodies to collect their own Beneficial Ownership (BO) data, and to use the national BO database to cross-check their reliability;
2. Meetings convened by GHEITI with the ORC, Minerals Commission, and Petroleum Commission to encourage regulatory bodies to integrate their data using Application Programming Interfaces (APIs);
3. A study on Illicit Financial Flow Risks in Ghana's Artisanal and Small-Scale Gold Mining (ASM) sector. The study identified loopholes and regulatory weaknesses that facilitate tax avoidance in the sector (link[5]);
4. Open Extractives Programme, focusing on the use of BO data to combat corruption; and
5. A revenue assurance study to support Ghana Revenue Authority (GRA) revenue mobilisation from the ASGM sector. This identified weaknesses in ASGM tax administration that are exploited by gold miners and traders alike.

The work plan was subjected to a mid-year review by the MSG and other relevant stakeholders, as has always been the practice, and activities were adjusted where necessary to reflect unforeseen developments. Implementation was financed through a combination of government budgetary allocations and development partner support, and lessons from implementation informed corrective actions and subsequent planning cycles. The 2023 workplan can be accessed via the link[6].

[4] https://www.gheiti.gov.gh/site/index.php?option=com_phocadownload&view=sections&Itemid=54

5 https://www.gheiti.gov.gh/site/index.php?option=com_phocadownload&view=category&download=558:iffs-in-ghanas-asm-sector&id=15:implementation-reports&Itemid=54

6 https://www.gheiti.gov.gh/site/index.php?option=com_phocadownload&view=category&id=18:workplans&Itemid=54

SECTION TWO: LEGAL AND INSTITUTIONAL FRAMEWORK, CONTRACTS AND LICENSES

This section covers the management of the contracting and licensing regime in the oil and gas sector. It is intended to help stakeholders understand the laws and procedures for the award of exploration and production rights; the legal, regulatory, and contractual frameworks that apply to the oil and gas sector, and the responsibilities of State agencies in managing the sector.

The EITI requirements related to the transparency of the legal framework and award of extractive industry rights include: (2.1) Legal framework and fiscal regime; (2.2) Contract and licence allocations; (2.3) Register of licences; (2.4) Contracts; (2.5) Beneficial ownership; and (2.6) State participation in the extractive sector.

2.1 Legal Framework and Fiscal Regime

This section deals with the laws governing the upstream petroleum industry in Ghana, including the fiscal regime. The country's legal framework and fiscal regime, as reported in the 2021/2022 Oil and Gas Report[7], remain largely unchanged. A summary of the laws is shown in Table 2.1 .

Table 2.1: Key Regulations for Upstream Oil & Gas Sector

Regulations	Legislation/Policy Enacted Under
Petroleum (Exploration and Production) (General) Regulations, 2018 (L.I. 2359)	Petroleum (Exploration and Production) Act, 2016 (Act 919)
Petroleum (Exploration and Production) (General) (Amendment) Regulations, 2019 (L.I. 2390)	Petroleum (Exploration and Production) Act, 2016 (Act 919)
Petroleum (Local Content and Local Participation Regulations), 2013 (L.I. 2204) As Amended Petroleum (Local Content and Local Participation) (Amendment) Regulations, 2021 (L.I. 2435)	Petroleum Commission Act, 2011 (Act 821)
Petroleum Commission (Fees and Charges) Regulations, 2015 (L.I. 2221)	Petroleum Commission Act, 2011 (Act 821)
Petroleum (Exploration and Production) (Health, Safety and Environment) Regulations, 2017 (L.I. 2258)	Petroleum (Exploration and Production) Act, 2016 (Act 919)
Petroleum (Exploration and Production) (Measurement) Regulations, 2016 (L.I. 2246)	Petroleum (Exploration and Production) Act, 2016 (Act 919)
Petroleum (Exploration and Production) (Data Management) Regulations, 2017 (L.I. 2257)	Petroleum (Exploration and Production) Act, 2016 (Act 919)
Petroleum Revenue Management Regulations, 2019 (L.I. 2381)	Petroleum Revenue Management Act, 2015 (Act 815)
Natural Gas Pipeline Safety (Construction, Operation and Maintenance) Regulations, 2012 (L.I. 2189)	Energy Commission Act, 1997 (Act 541)

[7] https://eiti.org/documents/ghana-2021-2022-eiti-report-oil-and-gas

Regulations	Legislation/Policy Enacted Under
Natural Gas Distribution and Sale (Technical and Operational) Rules, 2007 (L.I. 1911)	Energy Commission Act, 1997 (Act 541)
Natural Gas Distribution and Sale (Standards of Performance) Regulations, 2007(L.I. 1912)	Energy Commission Act, 1997 (Act 541)
Natural Gas Transmission Utility (Technical and Operational) Rules, 2007(L.I. 1913)	Energy Commission Act, 1997 (Act 541)
Natural Gas Transmission Utility (Standards of Performance) Regulations, 2008(L.I. 1936)	Energy Commission Act, 1997 (Act 541)
Transfer Pricing Regulations, 2020 (L.I. 2412)	Ghana Revenue Authority Act (Act 791)
Environmental Assessment Regulations, 1999 (LI 1652)	Environmental Protection Agency Act, 1994 (Act 490) Fees and Charges (Miscellaneous Provisions) Act , 2022 (Act 1080)

Source: GHEITI (2023)

This section focuses mostly on the new laws that came into force and the laws that were amended or are in the process of amendment within the reporting period

2.1.1 Legal Framework (Ongoing Reforms)

1. **The Onshore Petroleum Exploration and Production Policy, 2024**

The Petroleum Exploration and Production Policy was developed in 2024 to provide the basis for plugging the gaps pertaining to onshore petroleum activities in the National Energy Policy and the existing upstream legislation. The ultimate goal of this Policy is to define a framework that will attract investments into Ghana's onshore sedimentary basins and regulate and manage oil and gas activities in a cost-efficient and environmentally sustainable manner.

The key objectives of the Onshore Petroleum Policy are to:

- accelerate the development of the country's onshore petroleum resources;
- achieve clarity and enhance transparency for onshore oil and gas activities;
- ensure a competitive and fair fiscal regime to attract the needed investment;
- ensure maximum participation of Indigenous Ghanaian Companies (IGCs); and
- ensure sustainable and safe operations to minimize social and environmental impacts.

The key elements of the Policy include:

i. A clear definition of onshore exploration and production
ii. A two-stage licensing regime (an exploration license agreement and a development and production license agreement) to cover the exploration and production phases of petroleum operations.
iii. An exploration license gives the licensee exclusive exploration rights for a strict period of two years with the Right of First Refusal to a Development and Production License, which shall be subject to Parliamentary ratification.
iv. The Minister for Energy shall be responsible for the award of the Exploration License Agreements, similar to the prospecting license in the mining sector.

v. A Production Sharing regime instead of the current hybrid or royalty-tax system in the offshore operations.
vi. Overriding payments (which shall be 6 percent of gross petroleum production) to fund key areas:
- Ghanaian content development (1 percent)
- Community development and recognition of landownership (3 percent)
- decommissioning, and abandonment (1 percent)
- State participation in data acquisition (1 percent).

vii. The Minister for Energy shall collaborate with the Minister for Lands and Natural Resources prior to the award of exploration licenses.

The Ministry of Energy and Green Transition developed this policy in collaboration with the Petroleum Commission and the Ghana National Petroleum Corporation and took into consideration comments from stakeholder consultations pertaining to the 2021 National Energy Policy.

Given that the Onshore Petroleum Exploration and Production Policy does not fully align with the existing upstream legislation, steps are being taken to amend the relevant upstream laws and regulations to align with the Onshore Petroleum Policy.

2. The Environmental Protection Act, 2025 (Act 1124)

This Act amended and consolidated the laws relating to environmental protection; established the Environmental Protection Authority to regulate and protect the environment, provide for pesticide control and regulation; provide for the control, management and disposal of hazardous waste and electrical and electronic waste; provide for the coordination of climate change responses and for related matters. It replaced the Environmental Protection Agency Act, 1990 (Act 490). The Act can be accessed via the link[8]

3. Ghana Energy Transition and Investment Plan

This was developed based on the Ghana National Energy Transition Framework with the aim of helping Ghana to frame an energy transition agenda that will attract investments while ensuring a just transition and fully supporting Ghana's rapid economic growth trajectory. The Plan envisaged Ghana achieving net-zero emissions by 2060 at a cost of US$550 billion. This reduces Ghana's target date for achieving net-zero from 2070 to 2060. The plan can be accessed via the link[9]

The Ghana Energy Transition and Investment Plan was developed through a collaboration between the Government of Ghana and Sustainable Energy for All (SE4ALL). The Government Team was led by the Ministry of Environment Science and Technology, with the Ministry of Energy and Green Transition and some of its agencies playing complementary roles. The framework can be accessed via the link[10].

8 https://epa.gov.gh/new/wp-content/uploads/2025/01/Environmental-Protection-Act-2025-Act-1124-2.pdf

9 seforall.org/system/files/2025-05/Ghana-ETIP.pdf

4. Amendment of the Petroleum Revenue Management Act, 2011 (Act 815) as amended

This Act is under review to increase the portion of petroleum revenue meant for the Annual Budget Funding Amount (ABFA), to make more money available for the Big Push, a government initiative to improve road infrastructure and connectivity across the country. The proposed amendments include:

- Adjusting the 70:30 ratio between Capital Expenditure and Goods and Services for the utilization of ABFA to allocate 95 percent to Capital Expenditure and 5 percent to the District Assembly Common Fund.
- Funding PIAC's activities from the general government fund instead of its allocation of ABFA under Act 893.

The Act can be accessed via the link[11]

5. Petroleum (Exploration and Production) Act, 2016 (Act 919)

Act 919 is the governing law of the petroleum upstream industry in Ghana and was passed by the Parliament of Ghana in 2016.

In recent times, concerns have been raised by some investors about Ghana's fiscal regime. Carried Interest has been singled out as higher compared to other Oil producing countries. Further, investors have raised concerns about the scope of Ghana's carried interest that requires the investor to carry GNPC through exploration and development without reimbursement. Apart from this, the global energy transition has resulted in dwindling investor interest in oil and gas exploration and production, creating funding challenges for such projects. As a result, Act 919 and the Petroleum (Exploration and Production)(General) Regulations, 2018 (L.I. 2359) as amended, are being reviewed to make the fiscal regime more flexible and competitive, as well as improve transparency and predictability of the industry to attract investments.

The review of the Petroleum (Exploration and Production) Act, 2016, is also necessitated by the development of the Onshore Petroleum Exploration and Production Policy. The policy has provisions that are not reflected in the Act and its Regulations.

The Committee undertaking the review of the Act and its Regulations comprises the Ministry of Energy and Green Transition, the Office of the Attorney General and Ministry of Justice, the Petroleum Commission, the Ghana National Petroleum Corporation, the Ghana National Gas Limited Company and the Ghana Upstream Chamber.

6. Draft Environmental Protection (Petroleum) Regulations, 2025

The Regulations are being developed to prescribe the requirements for:

- The issuance of environmental permits for petroleum and petroleum-related activities;
- The issuance of licences for the import or transport of chemicals for petroleum and petroleum-related activities;
- The management of waste resulting from petroleum operations;

11 https://www.mofep.gov.gh/publications/acts-and-policies/petroleum-revenue-management-act-815

- Minimising the flaring and venting of gas;
- Emissions and discharges of harmful or noxious substances and materials into the external environment;
- Emergency planning, preparedness, and response against oil pollution;
- A baseline survey and the monitoring of the external environment;
- The environmental issues relating to the decommissioning and post-decommissioning of an installation or a pipeline.

These regulations apply to both upstream and midstream petroleum activities and are being developed by the Environmental Protection Authority in collaboration with other stakeholders, such as the Petroleum Commission.

7. The Gas Master Plan

The Gas Master Plan has been under review since 2022 to expand the gas market and gas infrastructure to ensure optimal development and utilisation of the country's natural gas resources. The Ministry of Energy and Green Transition has been leading the process with support from the Ghana National Gas Limited Company (GNGLC), the Petroleum Commission (PC) among others.

GHEITI's Observation

In the 2024 manifesto of the NDC Government, it promised to increase targeted exploration activities to establish new reserves by rebuilding investor confidence through policy and regulatory clarity, consistency, predictability, transparency and governance and attract world-class investors. It also promised to innovate multi-field development systems that optimise development infrastructure and allow profitable production of otherwise marginal fields.

To this end, the Government has:

i. Withdrawn the 2020 unitisation directives, resulting in the appraisal of the Afina Discovery in the West Cape Three Points Block 2 Contract Area.

ii. Initiated the review of the Petroleum (Exploration and Production) Act, 2016 (Act 919) and its regulations to improve predictability and transparency and make the fiscal regime more flexible.

iii. Signed a Memorandum of Understanding (MoU) with the Jubilee and Tweneboa Enyenra Ntomme (TEN) Fields partners for the extension of the periods of the West Cape Three Points (WCTP) and the Deep Water Tano (DWT) Petroleum Agreements to enable them to undertake further investments to optimally develop the petroleum resources in these Contract areas. These investments include infrastructure-led exploration in development and production areas.

iv. Commenced discussions to construct a second gas processing plant to encourage the development and utilisation of the country's natural gas resources.

The Government has demonstrated its commitment to implementing the country's Energy Transition Plan by changing the Ministry of Energy's name to the Ministry of Energy and Green Transition and by pursuing a strategic five-point agenda to accelerate the nation's shift towards sustainable energy. This includes:

- The establishment of a Renewable Energy and Green Transition Fund to drive innovation and investment in sustainable energy.

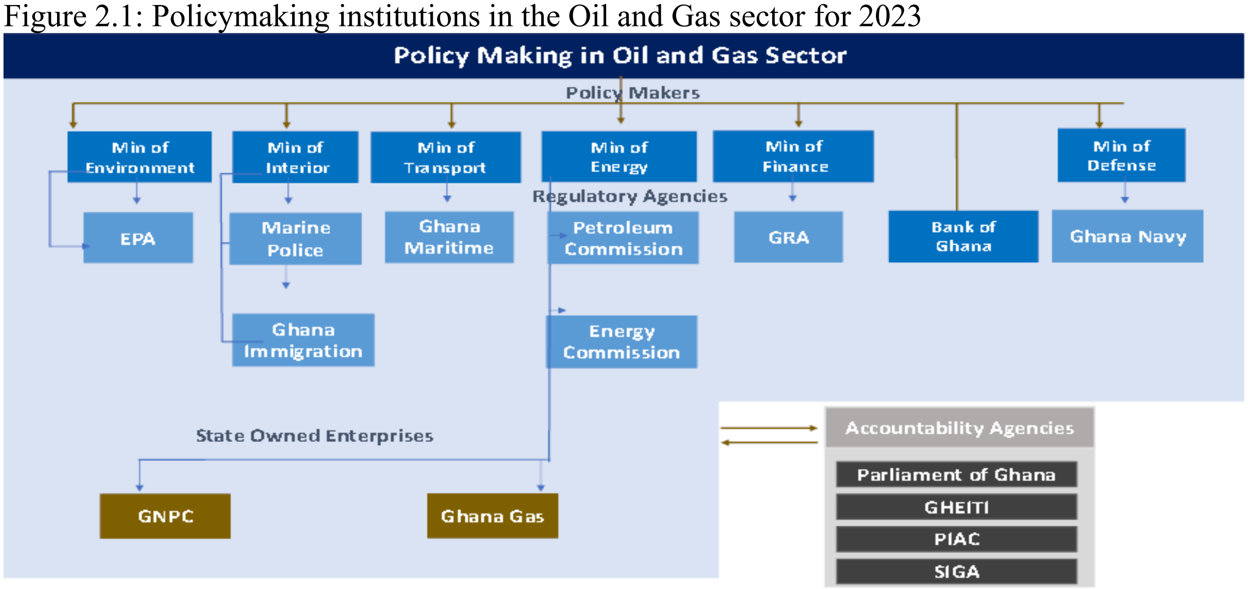
- The deployment of smart solar-powered streetlights nationwide as a measure to transition to solar-powered systems to enhance public safety while reducing the financial burden on the State's utilities.
- Deployment of renewable energy mini-grids.
- Enactment of a Bill to establish a Renewable Energy Authority. This is currently undergoing technical review.
- Implementing an open and competitive process for renewable energy capacity procurement. This approach is expected to ensure competitive pricing, attract credible investors, and accelerate the green transition agenda.

2.1.2 Institutional Framework

The institutions that play critical roles in the Oil and Gas Sector in Ghana are shown in figure 2.1 below and their functions as reported in the 2021-2022 GHEITI Oil and Gas Report[12] have not changed, except that the name of the Ministry of Energy has been changed since 9th January, 2025, to the Ministry of Energy and Green Transition.

This change was done through the Civil Service Instrument, 2025, which confers powers on the President of the Republic of Ghana under Section 11(3) of the Civil Service Act, 1993 (PNDCL 327). This change was to reflect the country's commitment to integrating sustainability into its energy sector policies and ensuring that the sector aligns with global climate goals and climate justice, as well as promoting renewable energy development.

Figure 2.1: Policymaking institutions in the Oil and Gas sector for 2023



Source: GHEITI (2023)

12 https://eiti.org/documents/ghana-2021-2022-eiti-report-oil-and-gas

2.1.3 Fiscal Regime

The 2023 Petroleum Upstream fiscal regime was not different from that reported in the 2021/2022 GHEITI Oil and Gas Report[13]. Table 2.2 provides a summary of the fiscal terms in the Oil and Gas sector.

Table 2.2: Fiscal Regime for the Oil and Gas Sector

Fiscal Terms	Pre-Act 919	Post – Act 919
Royalty Oil	5.0%– 12.5%	Biddable
Royalty Gas	3.0%– 5.0%	5.0%
Initial Participation Interest (GNPC Pays production cost only)	10.0% - 15%	15.0%
Additional Participation Interest (GNPC Pays Development and production costs)	2.5% - 5.0%	Biddable/Negotiable
Paid Interest and right of Pre-emption	Optional & pre-emptive rights available to GNPC during disposal of petroleum rights	4% - 24%
Additional Oil Entitlement	AOE is based on Contractor after tax-inflation-adjusted rate of return exceeding a specified level in a Petroleum Agreement	4 tier varying by PA
Bonus Payments	Biddable/Negotiable (Signature or Production bonus)	Biddable/Negotiable
Income Tax	35% (based on Income Tax Act, 2015)	35%
Surface Rentals (Onshore)	US$225- US$900/ sq.km/year depending on stage of operation	US$ 225-900
Surface Rentals (Offshore)	US$30 -US$200/sq.km/year depending on stage of operation	US$150-US$600/ sq.km/year depending on stage of operation
Indirect Taxes	Exempt	Exempt
Local Content Fund	1%	As set out in Act 919 and the Petroleum Agreement 1% of all subcontracts

Source: GHEITI's construct (2025)

However, plans are underway to review some of the fiscal terms and amend Act 919 and its regulations accordingly.

The approval of the Onshore Petroleum Exploration and Production Policy in 2024 introduced Production Sharing Contracts for onshore petroleum operations, which came with new fiscal

13 https://eiti.org/documents/ghana-2021-2022-eiti-report-oil-and-gas

elements, subject to the amendment of Act 919 and its regulations. The fiscal elements include overriding payment, cost oil, and profit oil.

Overriding payments: this is 6 percent of gross production to be disbursed as follows:

- 1 percent to the Ghanaian Content Fund or Local Content Fund
- 1 percent to a Data Acquisition Fund
- 1 percent to the Decommissioning Fund
- 3 percent as royalty to the communities within which the petroleum operations take place.

Cost Oil: The portion of gross production that is allocated for the recovery of actual cost incurred by the contractor in the petroleum operations. It is 50 percent of gross petroleum left after deduction of overriding payments. The cost oil serves as a cap that limits the contractor's ability to deduct its cost before profit is shared.

Profit Oil: The portion of oil remaining after the deduction of overriding payments and Cost Oil. The profit oil will be shared between the State and the contractor according to the agreed percentages as shown in Table 2.3 below:

Table 2.3: Profit Oil Sharing Formula

Year of Production	State	Contractor
1 to 5	50.00%	50.00%
6 to 10	55.00%	45.00%
11 to 15	60.00%	40.00%
16 to 20	65.00%	35.00%
After 20	70.00%	30.00%

Source: Ministry of Energy and Green Transition (2025)

The State's share of the profit oil comprises royalty, Corporate Income Tax (CIT), Carried and Additional Participating Interest (CAPI), and Additional Oil Entitlement (AOE).

All the revenue streams shall be assessed by the relevant institutions from the State's profit oil, as currently done. Any residual amount after disbursement of royalties, CAPI and Corporate Income Tax from the State's Profit Oil share shall be recognised as Additional Oil Entitlement.

The Contractor's share of profit oil shall include the Indigenous Ghanaian Company (IGC) and any other Party (ies) that acquire(s) an interest in the block. Treating the Contractor Group's share as 100 percent, the sharing among the Contractor Parties shall be done as shown in Table 2.4.

Table 2.4: Contractors Distribution Formula

Contractor Group Distribution			
Year of Production	Contractor Party (ies) (95%)	IGC (5%)	Total
1 to 5	47.50%	2.50%	50.00%
6 to 10	42.75%	2.25%	45.00%
11 to 15	38.00%	2.00%	40.00%
16 to 20	33.25%	1.75%	35.00%
After 20	28.50%	1.50%	30.00%

Source: Ministry of Energy and Green Transition

All relevant laws, regulations and policies governing the petroleum sector and its fiscal regime are publicly accessible through official government portals. There were no known material deviations from the applicable fiscal regime during the reporting period, and all material revenue streams applicable to the petroleum sector have been disclosed through the EITI reporting process.

2.1.4 Carbon Tax and Pricing Mechanism

In 2023, the Government of Ghana introduced the Emissions Levy Act, 2023 (Act 1112) to mitigate the adverse effects of climate change and promote environmental sustainability. The Act imposed a levy on carbon dioxide equivalent (CO2e) emissions from key sectors of the Ghanaian economy, including construction, manufacturing, mining, and energy, as well as emissions from Internal Combustion Engine (ICE) vehicles. By targeting both industrial activities and transportation emissions, the Act aims to incentivize the reduction of Green House Gas (GHG) emissions and foster the adoption of cleaner technologies. Table 2.5 provides the emission levy rate for the specified economic sectors.

Table 2.5: Emission levy rate for the specified economic sectors

Sector	Emissions	Rates
Construction	Co2e	GHS100 (US$ 7.9)1 per tonne of emissions per month
Manufacturing	Co2e	GHS100 (US$ 7.9) per tonne of emissions per month
Mining	Co2e	GHS100 (US$ 7.9) per tonne of emissions per month
Energy (Oil and Gas)	Co2e	GHS100 (US$ 7.9) per tonne of emissions per month
Energy (Electricity and Heating)	Co2e	GHS100 (US$ 7.9) per tonne of emissions per month

Source: GHEITI’s construct (2025)

Following the promulgation of the Act, the Government was unable to collect the revenue due to the absence of a framework for capturing and computing carbon dioxide emissions as envisaged under the Act. In 2025, the Government repealed the Act[14].

Carbon Pricing

The Environmental Protection Agency (now the Environmental Protection Authority) has oversight over the country's carbon market. It developed the market conduct and trading rules as well as secured cabinet approval for the implementation of voluntary cooperation under article 6 of the Paris Agreement. Additional information on the country's carbon market can be accessed via the link[15]. In 2025, section 150 of the EPA Act introduced a legal framework for carbon trading, which can be accessed via the link.

2.1.5 Public subsidies and public Support to Extractive Industry

During the year under review, there were no public subsidies or state support to the extractive companies and there were no ongoing reforms to introduce any subsidy.

2.2 Contract and License Allocation

The process for contracting and licensing oil blocks in Ghana is enshrined in the Petroleum (Exploration and Production) Act, 2016 (Act 919) and its regulations[16]. Section 10(3) of the Act provides the default process for licensing blocks, which is an open, competitive public tender process.

However, the law also allows for licensing of blocks through direct negotiations for various reasons. In Section 10(5) of the Act, it stipulates that where an area or part of the area offered for tender in a public tender process has not become the subject of a petroleum agreement, but the Minister determines that it is in the public interest for that area to be subjected to a petroleum agreement, the Minister may initiate direct negotiations with a qualified body corporate for a petroleum agreement. As required by the law, the block licensing or allocation processes are preceded by a publication of the blocks available for licensing and the type of licensing process. In the case of Section 10(5), if more than one company expresses interest in licensing a block that has been published, the process reverses to a competitive tender process but if only one company expresses interest in a block, negotiations with that company will commence within thirty days from the date of publication of the invitation.

In Section 10(9), the Act allows for licensing blocks through direct negotiations without competitive tender, where direct negotiations represent the most efficient manner to explore, develop and produce the petroleum resources in a defined area. This approach involves providing the name of the area and the potential contractor, as well as the reasons for this decision and negotiations commence immediately after the publication.

14 http://www.ippgafrica.org/wp-content/uploads/2024/06/Ghana-Emissions-Levy-Act-2023Act1112.pdf

15 https://cmo.epa.gov.gh/

16 https://petrocom.gov.gh/download/petroleum-exploration-production-act-2016-act-919/

https://petrocom.gov.gh/download/petroleum-exploration-and-production-general-regulations-2018-l-i-2359/

Another process for allocating blocks in Ghana is through Ministerial Authorisation. Section 7(9) of Act 919 empowers the Minister responsible for petroleum-related activities to reserve a block or part of a block in an open area for the National Oil Company (GNPC).

The details of the licensing processes and the pre-qualification requirements are provided in the 2021/2022 GHEITI Oil and Gas Report[17].

Irrespective of the method used to allocate petroleum blocks, the allocation process is only deemed complete upon the ratification of the signed petroleum agreements by the Parliament of Ghana, in accordance with Article 268 of the 1992 Constitution. During the reporting period, there were no material deviations from the statutory procedures governing licence and contract allocation. Information on licence awards, allocation methods, and relevant dates is publicly accessible through the Petroleum Commission's petroleum register.

In addition to the processes described above, the Onshore Petroleum Exploration and Production Policy introduces a slightly new dimension to block allocation in the onshore environment. The Policy separates the petroleum agreement into an Exploration License Agreement and a Development and Production License Agreement. The Exploration License Agreement grants a contractor only exploration rights for a strict period of two years, with a Right of First Refusal to a Development and Production license agreement following commerciality declaration. The exploration license agreement will be granted by the Minister for Energy and Green Transition without parliamentary ratification.

The Development and Production license agreement grants a contractor exploration and production rights and since this involves the sharing of the country's petroleum resources, it will be ratified by Parliament. However, the provisions of the Onshore Petroleum Exploration and Production Policy are subject to the amendment of Act 919 and its regulations.

Act 919 provides for contract disclosure, this is being implemented by the Petroleum Commission through its petroleum register, where licenses are disclosed. All petroleum contracts entered into during the reporting period are publicly accessible through the Petroleum Commission's petroleum register in accordance with statutory requirements.

Updates on contracts

To ensure optimal development of the petroleum resources in the West Cape Three Points (WCTP) and Deep Water Tano (DWT) Contract Areas and to also sustain the country's oil and gas production, the Ministry has signed an MoU with the partners of the two petroleum agreements to extend the periods of the WCTP and the DWT Petroleum Agreements to the end of December 2040 to enable them to undertake further investments to optimally develop the petroleum resources in these Contract areas.

If the negotiations are successful, the partnership will invest about US$2 billion in a minimum of 10 wells and a maximum of 20 wells, in addition to the remaining wells yet to be drilled under the current Greater Jubilee full Field Development Plan (GJFFDP) and other infrastructure.

17 https://eiti.org/documents/ghana-2021-2022-eiti-report-oil-and-gas

For the duration of the extension of the Petroleum Agreements, GNPC will increase its additional participating interest by 3 percent-5 percent and negotiate a discounted gas price for gas from the Jubilee field.

The contractor is committed to working with GNPC and the Petroleum Commission to increase their capacity with a focus on technology (e.g. seismic acquisition and processing for fields in production and artificial intelligence for reservoir management).

A steering committee comprising the contractor parties, the Ministry of Energy and Green Transition, the GNPC, GNGLC, and the PC is being constituted to negotiate the terms of the MoU.

Following the approval of the Onshore Petroleum Exploration and Production Policy by Cabinet in 2024, four exploration license agreements were signed in the same year in respect of four onshore acreages (GH_VB_01, GH_VB_02, GH_VB_03 and GH_TB_01).

GNPC Exploration and Production Company Limited (Explorco) is the operator of Block GH_VB_01 and Bay Veritas Limited is the operator of Block GH_VB_03, both in the Voltaian Basin. Menxons Limited is the operator of blocks GH_VB_02 and GH_TB_01 in the Voltaian and Onshore Tano Basins, respectively.

However, the execution of the work programmes under these licenses depends on the completion of the amendment of Act 919 and its regulations to align with the Onshore Petroleum Exploration and Production Policy.

Updates on Direct Negotiation for Petroleum Blocks

In the 2018/2019 oil and gas licensing round, Block GH_WB_01in the Western Basin was reserved for GNPC pursuant to Section 7(9) of Act 919 and subsequently granted a Ministerial Authorisation. However, the Ministerial Authorisation was not submitted to Parliament for ratification because of issues about the Corporation's ability to fund the petroleum activities alone.

Following several discussions and consultations with the Minister, the Corporation applied for exploration and production rights over the block using its subsidiary, GNPC Explorco, with Tristar Upstream Oil and Gas Limited as a partner after considering other potential partners on 3rd July, 2024.

Negotiations were held, and a petroleum agreement over the block was signed a few months after and is currently pending Cabinet approval and parliamentary ratification.

In another development, Shell Overseas Holdings Limited was invited on 16th June, 2025, to commence direct negotiations on the South Deepwater Tano (SDWT) Block in the Offshore Western Basin, observing all the requirements of Section 10(6) of Act 919 and Regulation 19(6) of the Petroleum (Exploration and Production)(General) Regulations, 2018, L.I. 2359 as amended by L.I. 2390. The reasons given by the Ministry for engaging in direct negotiations on this block included the following:

a. The South Deepwater Tano Block was relinquished by AGM Petroleum in 2023 and has remained unlicensed since then, despite extensive promotion in various provinces across the world.

b. The block is located in deep to ultra deep waters where very few companies in the world have the experience to operate, mainly due to the high investment requirements in such water depths.
c. The energy transition and its impact on the global upstream industry have significantly reduced investor interest in deep to ultra-deep water investments, increasing the probability of the petroleum resources in such water depths becoming stranded.

Following this publication, negotiations with Shell officially commenced on 27th June, 2025 for the detailed terms of a petroleum agreement for the SDWT Block and are ongoing. During the reporting period, there were no material deviations from the statutory procedures governing licence and contract allocation. Information on licence awards, allocation methods, and relevant dates is publicly accessible through the Petroleum Commission's petroleum register which can be accessed via the link[18]

2.2.1 Technical and Financial Criteria

The technical and financial criteria as required by Act 919 and its regulations have not changed since the publication of the 2021-2022 GHEITI Oil and Gas Report. Therefore, the criteria described in the said Report remain valid and applicable.

The overall goal of these measures is to ensure that contractors have the requisite technical and financial capabilities to execute the agreed work programmes and fully comply with the international oil and gas industry best practices.

In assessing a company's technical capability, the State takes into consideration the company's technical staff strength and expertise, technology and its experience in environments similar to the area of interest and other environments. The State also considers the applicant's understanding of the geology of the area applied for and the appropriateness of the proposed work programme vis-à-vis data availability on the block and the amount of work required to properly explore and develop the resources in it, among others.

An applicant's financial situation is assessed by analysing its audited financial statements for the last three years preceding the application, focusing on its cash flows, assets, and liabilities. In the case of a subsidiary, its parent company's finances can also be assessed if the subsidiary is not capable of financing its activities in the block. The applicant's willingness to spend on its activities in the block is also assessed, taking into account its proposed minimum expenditure for the activities envisaged in the block.

Due diligence is also done to validate the documents and information provided by the companies. Refer to the 2021-2022 GHEITI Oil and Gas Report[19] for details on the technical and financial criteria used to assess the applicants for blocks.

Process for securing Free Prior Informed Consent (FPIC) from host communities

Ghana does not have a framework for securing the Free Prior Informed Consent from host communities. In practice, the Environmental and Social Impact Assessment public hearing

18 https://ghanapetroleumregister.com/

19 https://eiti.org/documents/ghana-2021-2022-eiti-report-oil-and-gas

required by the EPA Act has become the means by which community consent is sought. At the public hearing, communities have the opportunity to discuss the potential impact of the project on their environment, livelihoods, and culture, and to grant their consent to the proposed mitigation measures before the EPA issues a permit for the project to go ahead. Where consent is withheld, the EPA will not grant a permit until the concerns giving rise to the withholding of consent are addressed. The final EPA public hearing report contains a list of communities consulted, individual participants, addresses, and telephone numbers, as an appendix.

2.3 Register of Licenses

Pursuant to Section 56 of Act 919 and Regulation 20 of L.I. 2359, the Petroleum Commission has opened and maintained a petroleum register since 2018. As shown in Table 2.6, there are currently thirteen active and one inactive petroleum agreements in Ghana (South Deep Water Tano where the operator has relinquished its 80 percent stake in the block). The government is currently in the process of restructuring the Petroleum Agreement. The Register is publicly accessible via the link[20]

The four exploration license agreements have not yet been included in the petroleum register because of the ongoing review of Act 919 and its regulations to align with the Onshore Petroleum Policy.

Table 2.6: Status of various Petroleum Agreements for 2023

NO	PETROLEUM AGREEMENT	STATUS
1	West Cape Three Points	Production
2	Deep Water Tano	Production
3	Offshore Cape Three Points	Production
4	Deepwater Tano/Cape Three Points	Pre-development The Plan of Development (PoD) for the Pecan Field has been approved. The contractor is working on making the Final Investment Decision and procuring various services for the development of the Field.
5	West Cape Three Points Block 2	Exploration A commercial discovery has been made. The contractor continues to pursue the remaining work obligations in the PA.
6	Cape Three Points Block 4	Exploration A commercial discovery has been made and is being further evaluated by the contractor to enable it to prepare and submit the PoD. Another discovery is being appraised.
7	Central Tano Block	Exploration
8	Deepwater Cape Three Points West Offshore	Exploration
9	East Cape Three Points	Exploration

20 https://ghanapetroleumregister.com/contract-areas/

NO	PETROLEUM AGREEMENT	STATUS
10	East Keta Block	Exploration
11	Expanded Shallow Water Tano Block	Exploration
12	Deepwater Cape Three Points	Exploration
13	Offshore Southwest Tano Block	Exploration
14	South Deepwater Tano	Exploration The operator has relinquished its interest in the Petroleum Agreement (PA) and negotiations are being held to restructure the partnership in the PA.

Source: GHEITI's construct (2025)

2.4 Contracts and Licenses

As discussed in Section 2.3 and in the 2021-2022 GHEITI Oil and Gas Report, Section 56 of Act 919 and Regulation 20 of L.I. 2359 as amended, require the Petroleum Commission to disclose all contracts, licenses, permits and authorisations in the petroleum register, which has been done. The 2021-2022 GHEITI Oil and Gas Report provides the details of the extent of disclosure of the contracts in Ghana's upstream industry[21]. As previously mentioned, the four exploration licence agreements over the onshore acreages are yet to be published on the Petroleum Register because of the ongoing review of Act 919.

In accordance with Act 919, all Petroleum Agreements, Permits, and Authorisation must be disclosed or published in the Petroleum Register irrespective of materiality.

The Petroleum Agreement is the main contract from which all drilling, production, re-injection and flaring permits, deeds of assignments, amendments, Plan of Developments etc. result. Therefore, such documents serve as annexes or addenda to the petroleum agreement.

2.4.1 Contracts Disclosure Policy

Government does not have an explicit policy statement on contract disclosure, however, the provisions for contract disclosures are enshrined in section 56 of Act 919 which mandates that:

- The Commission shall establish and maintain a Register of Petroleum Agreements, licences, permits and authorisations as prescribed; and
- The Register shall be open to the public.

Also, in compliance with EITI requirements, the Government has publicly disclosed all the Petroleum Agreements entered into by the Republic in the Petroleum Register. The Agreements stipulate parties' interests, contract area, exploration period and spell out contractor rights and obligations in relation to the National Oil Company, GNPC among others.

The Model Petroleum Agreement is also publicly displayed on the Ministry of Energy's website[22]

Two Oil and Gas companies have independently disclosed some agreements on their websites.

21 https://eiti.org/documents/ghana-2021-2022-eiti-report-oil-and-gas

22 https://energymin.gov.gh/

These are Tullow Ghana Ltd[23] and Kosmos Energy[24]

Tullow Ghana has published two Petroleum Agreements[25]: Deep Water Tano Contract Area and the West Cape Three Points Contract Area. Copies of the relevant Deeds of Assignment (DoA) on these Agreements have been published.

It has the under listed Deeds of Assignment also on display on its website.

- West Cape Three Points DoA March 2008
- West Cape Three Points DoA December 2008
- Deepwater Tano DoA September 2006
- Deepwater Tano DoA March 2008
- West Cape Three Points DoA September 2006

Kosmos Energy Ghana has the following Agreements publicly displayed:

- West Cape Three Points
- Joint Operating Agreement, West Cape Three Points
- Joint Operating Agreement, Deepwater Tano
- Deed of Assignment – Deepwater Tano
- Unitisation and Unit Operating Agreement – Jubilee Field Unit

The above Agreements can be accessed through the official website[40] of Kosmos Energy Ltd

2.5 Beneficial Ownership

2.5.1 Ghana's Policy on Beneficial Ownership Disclosure

Ghana has continued to make steady progress in improving transparency around who really owns and controls companies operating in the extractive sector, in line with Requirement 2.5 of the EITI Standard. The disclosure of Beneficial Ownership (BO) information helps make it clear which individuals ultimately benefit from or exercise control over oil, gas, and mining companies. This is an important step in reducing the risks of hidden interests, conflict of interest, and corruption.

The country's approach to beneficial ownership disclosure is grounded in the Companies Act, 2019 (Act 992). Under this law, all registered companies are required to submit information on their beneficial owners to the Office of the Registrar of Companies (ORC) when they are incorporated and through their annual filings. This obligation applies equally to companies in the extractive industries, ensuring that ownership information is captured across the sector.

All companies, including those limited by shares, limited by guarantee, unlimited companies, and external companies, are required to disclose BO data to the Office of the Registrar of Companies

(ORC) during incorporation, registration or filing of annual returns. This includes extractive companies that bid for, operate, or invest in Ghana.

In practice, BO details that are first submitted during incorporation or annual returns filings are initially authenticated with the Ghana National ID card database, processed, and integrated into the central register of companies. The central register is available to the public on request and conditioned on the payment of a fee (GHS 25.00, the equivalent of US$ 2.00 as at the time of publication of this report). The MSG does not consider the GHS25.00 access fee as a barrier to accessing BO data. Further discussions between GHEITI Secretariat and the Office of Registrar of Companies (ORC) have confirmed that the amount charged constitutes a significant revenue source to cover the ORC's operations. At the time of writing, ORC confirmed that processes were far advanced to allow online access to BO information. Further, MSG has been engaged in the ORC's stakeholder engagements in the design of their new data collection software which, once completed, will allow companies to submit and access BO information online.

Upon request for BO information of any company, the following information will be provided:

- Name of the beneficial owner, including any former name(s);
- Business address;
- Percentage of beneficial ownership interest;
- Nature of interest; and
- Declaration as to whether the beneficial owner meets the definition of a Politically Exposed Person(s) (PEP).

The full BO information collected by the Office of the Registrar of Companies is accessible to all competent authorities and law enforcement agencies at no cost.

Table 2.7: Key Definitions in Ghana's BO Regime

Key Terms	Definition
Beneficial Owner	The MSG agrees to the definition of a Beneficial Owner as defined in the Companies Act
Politically Exposed Persons (PEPs)	As per the Companies Act, 2019, PEPs are required to disclose their BO interest regardless of their level of ownership threshold
Companies listed on the stock exchange	Companies Act, 2019, requires all companies listed on stock exchange to disclose the name of stock exchange, percentage of shares listed on the stock exchange and the link to their stock exchange fillings.
Joint Venture Companies	Companies Act, 2019, requires all JVCs to disclose

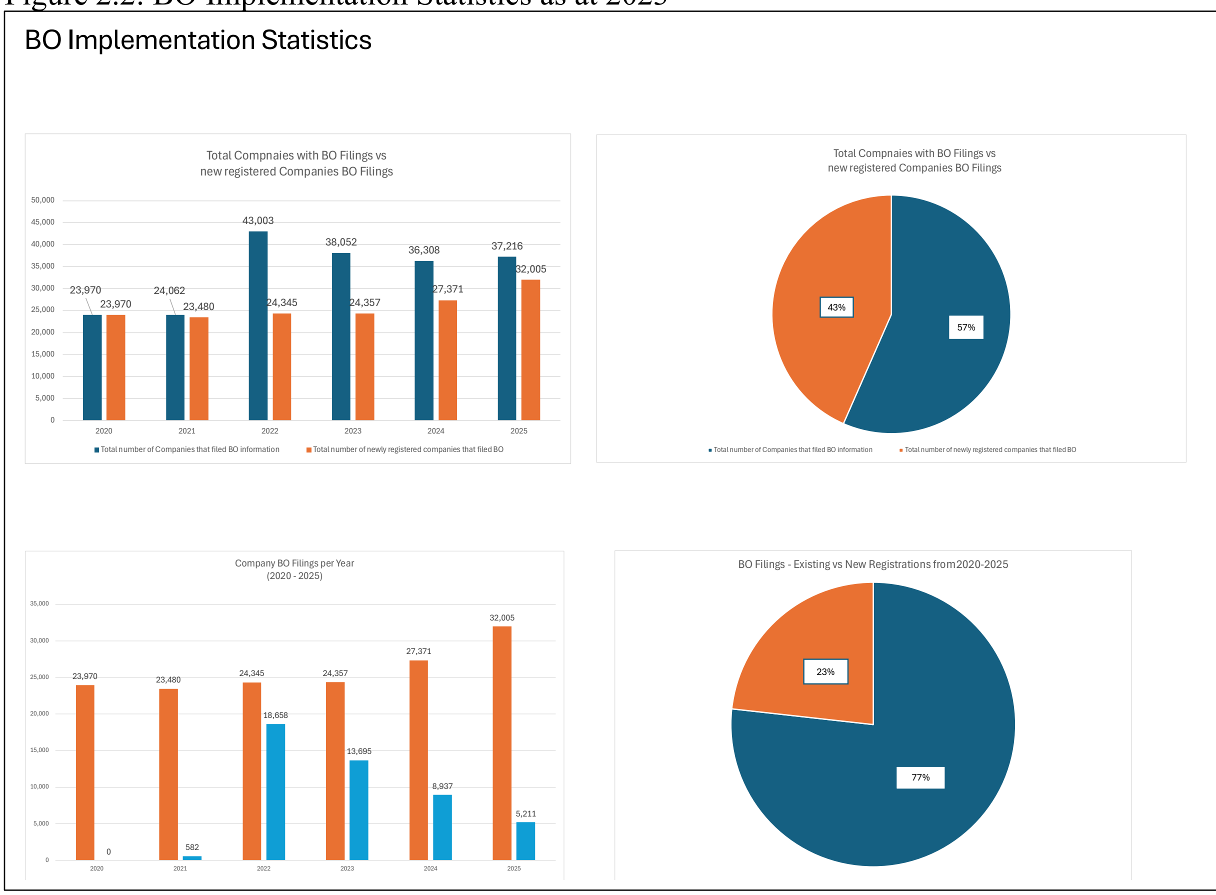
Key Terms	Definition
(JVC) BO disclosure requirement	their BO interest including publicly listed companies or wholly owned subsidiaries of a publicly listed company.
Ownership Threshold	During the year under review, the applicable threshold for extractive companies is 5%.

Source: GHEITI's construct (2025)

Records from the ORC show a clear increase in BO filings between 2020 and 2025. In 2022 alone, 43,003 companies submitted beneficial ownership information, a marked rise from 24,062 filings in 2021. Of the 2022 submissions, 24,345 came from newly registered companies, while 18,658 were from existing companies updating their records. This growth points to stronger enforcement of the rules and better awareness and compliance among companies.

Engagement with the BO system has remained strong in subsequent years. The cumulative BO fillings as at 2023 was 38,052 across all sectors, followed by 36,308 in 2024 and 37,216 in 2025. Over the same period, filings from existing companies declined steadily, suggesting that many older companies had already met their disclosure requirements in earlier years.

Figure 2.2: BO Implementation Statistics as at 2023



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These include the use of standardised forms with mandatory fields, verification of identities against national records such as those held by the Ghana Revenue Authority, automated checks to ensure completeness and consistency, internal data cleaning processes, ongoing monitoring, and external audit and reporting mechanisms. Together, these measures help ensure that Beneficial Ownership information is reliable and can be confidently used to support effective oversight and accountability in the extractive sector.

Table 2.8: Legal Ownership and Beneficial Ownership Disclosure for exploration and Reconciled Companies

Company	Type	Legal ownership information	Beneficial owners	Nationality	Nature/details of interest	Correspondence / business address	PEP (Y/N)
Tullow Ghana Exploration and Production Ltd	Private	Tullow Overseas Holdings B.V – 100% shareholding	Tullow Oil PLC	British	Indirect voting rights – 100%; controlling rights (right to appoint/remove majority of directors)	9 Chiswick Park; 566 Chiswick High Road; London, W4 5XT	No
Vitol Upstream (Ghana) Ltd	Private	Atlantic Energy Limited – 100% shareholding	James Malcom Arthur	British	controlling rights (right to appoint/remove majority of directors); Indirect Shareholding and Voting Rights	Level 2, 437 Roberts Road; Subiaco, Western Australia 6008	No
ENI Ghana Exploration and Production Ltd	Private	ENI SpA (listed on Milan Stock Exchange and NYSE)	ENI SpA Milan Stock Exchange (100% shares listed)	Italian	Financial voting rights – 100%; controlling rights – right to appoint and remove majority of directors	ENI Milan headquarters; Piazza Ezio Vanoni, 1 – 20097 San Donato Milanese (MI), Italy	No
Quad Energy Limited	Private	TanOil Limited – 100% Shareholdings	Anthony Oteng Gyasi	Ghanaian	Indirect voting rights	3 Emmause 2nd Close, Labone; Accra, Ghana	No
			Angela List	Ghanaian	Indirect voting rights	3 Emmause 2nd Close, Labone; Accra, Ghana	No
			David Adomako	Ghanaian	Indirect voting rights	3 Emmause 2nd Close, Labone; Accra, Ghana	No

Company	Type	Legal ownership information	Beneficial owners	Nationality	Nature/details of interest	Correspondence / business address	PEP (Y/N)
Fuel Trade Limited	Private	Dzifa Cudjoe – 30%; Chris Chinebuah – 70% (shareholding)	Dzifa Cudjoe; Chris Chinebuah	Ghanaian Ghanaian	30% direct shareholding interest 30% direct voting rights; 70% direct shareholding interest 70% direct voting rights	6th Floor, Advantage Place; Ridge West, Accra, Ghana	No
Jubilee Oil Holdings Limited (External Company incorporated in Cayman Islands)	Public	GNPC – 100% direct shareholding	GNPC	Ghanaian	100% direct shareholding; 100% direct voting rights Right to appoint and remove majority of directors	GNPC, PMB; Petroleum House; Tema, Ghana	No
Kosmos Energy Ghana HC (External Company incorporated in Cayman Islands)	Private	Kosmos Energy Ltd (listed on NYSE)	Kosmos Energy Ltd	USA	Indirect voting rights – 100% Right to appoint/remove majority of directors	15011 Katy Freeway, Suite 700; Houston, Texas 77094	No
AGM Petroleum Ghana Ltd	Private	TRG Energy AS – 100% shareholding	Kjell Inge Rokke	Norwegian	Indirect shareholding – 100%; Indirect voting rights – 87%	Oksenøyveien 10; 1366 Lysaker; Viken, Norway	No
Menxons Limited	Private	Joseph Tachie-Menson 100% Shareholding	Joseph Tachie - Menson	Ghanaian	100% Shareholding 100% Voting Rights Right to appoint/remove majority of directors	6 Bissue Street, East Legon, Accra, Ghana	No
PetroSA Ghana Limited	SOE	External Company Registration	Not Disclosed	South African			
Bay Veritas Limited	Private	Frank Osei Wusu (75% Shareholding)	Disclosed	Frank Osei Wusu	75% Shareholding 75% Voting Rights Right to appoint/remove majority of directors		

Company	Type	Legal ownership information	Beneficial owners	Nationality	Nature/details of interest	Correspondence / business address	PEP (Y/N)
		Ernest Appiah (25% Shareholding)	Disclosed	Ernest Appiah	25 % Shareholding 25% Voting Rights Right to appoint/remove majority of directors		

Source: GHEITI's construct (2025)

2.5.2 Measures to ensure the comprehensiveness and reliability of BO data

According to the Office of the Registrar of Companies (ORC) verification and quality assurance processes for BO data includes

- Standardized data collection using forms with mandatory fields.
- Identity verification against national records (GRA).
- Automated validation (format, completeness, consistency).
- Internal data cleaning and data integrity controls.
- Continuous monitoring and mandatory updates.
- External audits and reporting mechanisms.

2.6 State Participation

The State participation reported in the 2021-2022 GHEITI Oil and Gas Report remains the same, with GNPC holding the commercial interest of the State in the thirteen petroleum agreements, while the GNGLC continues to play its mid-stream/downstream role.

In fulfilment of the dictates of requirement 4.2, GNPC has published on its website details of the crude oil it sold in 2023, including the names of the buyers and destinations where the oil was delivered, and can be accessed via the link[26]. GNPC, however, did not disclose the beneficial ownership information of the buyers.

GNGLC, on the other hand, has not published transactions and contractors on its website.

2.6.1 Ghana's Definition of SOEs

State-Owned Enterprises (SOEs) are entities whose shares are wholly held or controlled by the Government of Ghana. This includes Joint Venture Companies (JVCs) in which Government has more than 50 percent voting rights. All other information on this subject remains the same as that of the 2021/2022 GHEITI Oil and Gas Report.

[26] https://www.gnpcghana.com/download/cosr/GNPC_First_Trades_of_Crude_Oil_2015-2023_Final.xlsx

GHEITI's Observation:

As reported in the GHEITI 2021-2022 Oil and Gas Report, Cabinet directed on 11th May 2020, that the Ghana National Gas Limited Company (GNGLC) be assigned the national Gas Aggregatorship role, effectively expanding its mandate upstream and positioning it as the central entity responsible for the aggregation, marketing, and sale of natural gas. Following this directive, GNGLC participated in the Jubilee Post-Foundation Gas Sales Agreement (GSA) negotiations with Tullow Ghana Limited and the other Jubilee partners.

However, beyond its involvement in these post-foundation gas negotiations, GNGLC has not fully operationalised or assumed the Gas Aggregatorship role in practice. The existing Gas Sales Agreements, all of which predate the 2020 Cabinet decision, remain with GNPC, and have not been transferred to GNGLC. As a result, the institutional and commercial arrangements required for GNGLC to function as the sole Gas Aggregator have not been implemented, and GNPC continues to hold key responsibilities associated with gas marketing and sales.

Government's action amounts to amending the GNPC's statute of establishment which grants the Gas Aggregator role to GNPC through an administrative process

Recommendations:

i. The Government should consider withdrawing the directive assigning the Gas aggregator role to GNGLC

ii. Furthermore, the Government should amend the relevant legislation to give proper effect to the Government's intended objectives if it wants GNGLC or some other institution to play the gas aggregator role.

2.6.2 State Participation in oil and gas

The State participates in oil and gas exploration and production through the Ghana National Petroleum Corporation, which holds the State's commercial interest in all Petroleum Agreements. In accordance with Act 919, GNPC is required to hold at least 15 percent Initial Participating Carried Interest in every petroleum agreement with an option to take an additional participating interest when a commercial discovery is made. The details of GNPC's equity holdings in the various Petroleum Agreements are provided in the 2021/2022 GHEITI Oil and Gas Report[27]. Table 2.9 provides a summary of Government's equity in the various producing fields.

Table 2.9: GNPC's Equity and those of its Partners in Producing Fields, as at 2023

Project/Block/ Field	Operator	Partners	Percentage Stake	Status
West Cape Three Points Block – Jubilee	Tullow	Tullow Kosmos Occidental Petro SA GNPC	35.4795 24.0771 24.0771 2.7254 13.6408	**Production**

27 https://eiti.org/documents/ghana-2021-2022-eiti-report-oil-and-gas

Project/Block/ Field	Operator	Partners	Percentage Stake	Status
Deep Water Tano Block -TEN	Tullow	Tullow Kosmos Occidental PetroSA GNPC	47.175 17.000 17.000 3.825 15.000	**Production**
Offshore Cape Three Points Block – SGN	**ENI**	**ENI** **Vitol** **GNPC (Carried)** **GNPC (additional)**	**44.444** **35.556** **15.000** **5.000**	**Production**

Source: GNPC, 2024

2.6.3 Changes to State Participation in 2023

There were no significant changes to state participation in 2023 except that the South Deepwater Tano Petroleum Agreement, where GNPC held a Carried Interest of 15 percent was relinquished by the operator, thereby freezing GNPC's stake until the block is licensed to a new contractor.

The exploration licenses signed in 2024 also gave GNPC a Carried Interest of 15 percent in each of them, which has the potential to increase the State's participation in oil and gas exploration and production when these licenses are eventually activated.

GNPC Explorco is the operator of one of the blocks with a Participating Interest of 85 percent, which could result in dividends to the State in the future.

2.6.4 SOEs Expenditures and their Alignment with Energy Transition

Following the development of the Ghana Energy Transition Framework, all agencies under the energy ministry, including the national oil company were expected to develop their individual plans for achieving net zero by 2060. GNPC is yet to publish its Energy Transition framework and strategy, against which its investments would be aligned. However, the corporation maintains that its boldest statement on mitigating greenhouse emissions from its activities is its investment in the Mole Game Park, Ghana's largest and most biodiverse ecological reserve. Though GNPC does not invest directly in the park, it holds a 60 percent equity in Mole Motel Limited, a commercial facility in the reserve. GNPC classifies its investment in Mole Park as "green" investment aimed at promoting eco-tourism and showcasing its policy on biodiversity conservation – an unequivocal commitment to nature-based carbon sequestration.

2.5.5 Dividends to Government

GNPC and GNGLC did not pay dividends to the Government according to their audited financial statements for 2023 and 2024[28].

28https://www.gnpcghana.com/download/fr/2023_GNPC_FS.pdf

https://www.ghanagas.com.gh/static/media/Signedpercent202023percent20Auditedpercent20Financialpercent20Statement.6c221cf7800a3a003a2f.pdf

2.5.6 Statutory Financial Relationship Between SOEs and Government

The relationship between SOEs and the Government remains the same as published in the 2021-2022 GHEITI Oil and Gas Report. While GNPC is allowed to borrow under PNDCL 64, government finances its activities and its share of the Carried and Additional Participating Interest prescribed by the Petroleum Revenue Management Act, 2015 (Act 893) as amended, to finance its operations.

2.5.7 Financial Relationship Between SOEs and Government in Practice

The law requires GNPC to obtain Ministerial and Parliamentary approval before borrowing any amount exceeding the cedi equivalent of thirty million United States dollars. However, this requirement is not always adhered to in practice. For instance, in the acquisition of the 7 percent of Anadarko's stake in Jubilee, the Ministry of Finance lent US$ 164,789,691 to GNPC without parliamentary approval. GNPC's transactions within the reporting period are contained in the 2021/2022 GHEITI Oil and Gas Report[13].

GHEITI's Observation

1. **On tax paying position of JOHL and Explorco after acquisition of the seven percent commercial interest from Oxy in 2021:**

On 15th of October 2021, GNPC announced that it had acquired seven percent Commercial Interest in both the Jubilee and TEN fields from Occidental Petroleum (Oxy) for a purchase price of US$199 million effective 1st April, 2021[29].

GNPC announced that it had successfully transferred all the interest which was initially held by Jubilee Oil Holding Limited (JOHL), an external company registered in Cayman Island, to its subsidiary called GNPC Exploration and Production Company Limited (Explorco) on 15th November, 2023.

In 2021-2022 GHEITI Oil and Gas Report, GHEITI held that in accordance with Section 3 of the PRMA income from petroleum activities earned directly or indirectly needed to be paid into the PHF and that not doing do so amounts to a violation of the Act.

Since the asset's acquisition, there is no evidence of Corporate Income Tax payment.

Table 2.10 shows the annual Corporate Income Tax (CIT) amounts that Anadarko and Oxy paid prior to the acquisition between the period 2017 to 2021.

Table 2.10: Annual Corporate Income Tax Amounts that Anadarko and Oxy Paid

Year	Amount (US$)	Paye
2021	47,691,778	Anadarko Petroleum Limited
2020	86,419,605	Anadarko Petroleum Limited
2019	65,969,170	Anadarko Petroleum Limited
2018	50,202,493	Anadarko Petroleum Limited
2017	13,518,852.98	Anadarko Petroleum Limited

29 Refer to GHEITI's 2020 Oil and Gas Report published on 31 December 2024 for commentary on the acquisition. Report accessible at GHEITI's website.

Source: GHEITI's construct based on data from BOG

It is the expectation of GHEITI that since Anadarko/Oxy was in a tax paying position in respect of the interest acquired, the new equity owners, including Explorco should be in a tax paying position in a reasonable time after acquisition.

The Table 2.11 below shows the oil lifting revenues which accrued to JOHL and Explorco from the acquired interest since 2021.

Table 2.11: Revenue generated by JOHL/Explorco after the Acquisition.

Year	Revenue from liftings (US$)	Expenditure (US$)
2021	52,439,749	-
2022	273,013,477	232,915,101.26
2023	143,315,459.42	128,280,199.91
2024	145,681,117	-
2025	-	-

Source: GHEITI's construct from GNPC's financial statements

Examination of the financial records relating to JOHL and Explorco shows that their revenues accruing from the Jubilee and TEN fields are utilised indiscriminately on various expenditures, of which some substantial sums are expended on other separate projects and commitments. Again, some of the expenditures are not approved according to GNPC's work plan. For example, in 2023, Explorco spent US$2,112,902.28 to pay for cash calls related to ENI Block 4 and Springfield fields.

Part VI of the Income Tax Act, 2015 (Act 896) which principally governs taxation of petroleum operations, requires that persons with petroleum right must account for revenue and expenditure for each separate petroleum operations. A separate petroleum operation means a petroleum operation conducted under a development and production area approved under a particular Petroleum Agreement (PA). This means that each approved development and production area under a particular PA must be ring-fenced for the purpose of accounting for revenue and expenditure.

Wherefore as in the case of JOHL and Explorco, revenue accruing from operations under the Jubilee field (Deepwater Tano (DWT) Petroleum Agreement) and the TEN field (West Cape Three Points (WCTP) Petroleum Agreement) are comingled with other separate petroleum operations and unrelated commitments and this may impede the company's ability to report profitability and net income for tax purposes as stipulated under the Income Tax Act , 2015 (Act 896).

Recommendation

The MSG recommends that the Ghana Revenue Authority (GRA) should ensure that Explorco comply with the income tax law by ring-fencing its Jubilee and TEN operations in computing net income for tax purposes.

Further, the MSG recommends that the Revenue arising out of JOHL operations should be paid into the Petroleum Holding Fund (PHF) in line with the PRMA.

SECTION THREE: EXPLORATION AND PRODUCTION

This section covers disclosures of information related to exploration and production, enabling stakeholders to understand the potential of the sector. The EITI requirements related to the transparency in exploration and production activities, include: (3.1) Information about exploration activities; (3.2) Production data; and (3.3) Export data.

3.1 Exploration Activities

3.1.1 Deep Water Tano / Cape Three Points (DWT/CTP) Field

In the first half of 2023, Pecan Energies updated the Environmental and Social Impact Assessment (ESIA) study for the Pecan field to reflect the latest updates in the Plan of Development (PoD) and the name change. Stakeholder meetings were held on a national level as part of the EIA stakeholder engagement requirements. The review of the Environmental Impact Assessment (EIA) report of the project was finalised within the third quarter and approved by the management of Pecan Energies for submission to the Environmental Protection Agency (EPA) in the first quarter of 2024. This was a major project milestone and achievement in terms of environmental compliance for the Pecan project. The ESIA was finalised in the fourth quarter 2023 and submitted to the EPA in February 2024.

Pecan Energies in January 2024, following the approval of the POD in June 2023, requested the approval of the Minister to conduct exploration activities within the DWT/CTP development and production area. The planned exploration activities consisted of purely desktop work as part of continuous resource optimisation in the development and production area as described in the PoD. The aim of this work was to update the exploration portfolio and identify prospects to a drilling decision in order to make discoveries to increase the discovered resource base and increase the likelihood for a commercially viable field development project after the Pecan Phase 1 project.

The Final Investment Decision (FID) timeline has been delayed due to the Contractor Party's project reassessment of the project financing strategy amid the ongoing Russia-Ukraine geopolitical challenges. A technical advisor has been appointed by the Minister for Energy and Green Transition to evaluate, assess and provide solutions to the challenges faced on the project.

With the project yet to reach financial close, the President revealed in July 2025 that Shell has submitted a proposal to join the Pecan Oil field which is currently under review by stakeholders with expectations of a formal agreement. He also confirmed separate high-level engagements with current partners Lukoil and the African Finance Corporation aimed at accelerating progress on the field. The farm-in proposal by Shell is to develop and produce for both DWT/CTP and SDWT ultra-deepwater projects.

3.1.2 Voltaian Basin Project

In 2023, GNPC continued to acquire, process, and interpret 2D seismic data over the Basin. Following the completion of the data acquisition in 2024, the government issued three exploration licenses to GNPC Explorco (GNPC subsidiary), Bay Veritas and Menxons Limited for the conduct of further exploration activities.

Costs and Expenditure Analysis of the Voltarian Basin (2017–2024)

This Section provides a consolidated analysis of GNPC's Voltaian Basin exploration programme expenditures between 2017 and 2024, drawing on cumulative component-level financial data and year-on-year expenditure trends. The objective is to assess how financial resources were allocated over time, identify dominant cost drivers, and evaluate the spending patterns during the programme's implementation.

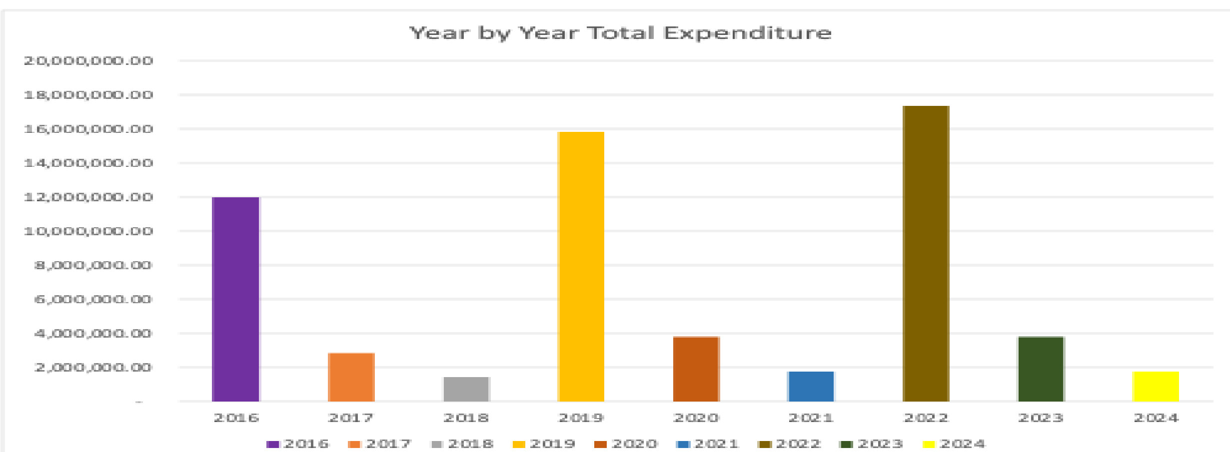
As at the end of the review period, total programme expenditure amounted to approximately US$166.36 million, comprising US$144.60 million in direct costs and US$21.76 million in indirect costs.

Overview of Year-on-Year Expenditure Trends

In 2017, total expenditure stood at approximately US$2.82 million, reflecting early-stage activities and limited field operations. Spending declined in 2018 to US$1.44 million, a period characterised by reduced operational intensity and a focus on planning and consolidation.

A significant increase occurred in 2019, when expenditure rose sharply to approximately US$15.85 million. This spike corresponds to a period of intensified technical activity and marks one of the most resource-intensive years of programme implementation. Expenditure subsequently moderated in 2020 (US$3.80 million) and 2021 (US$1.74 million), indicating a slowdown in capital-intensive operations.

Figure 3.1: Year by Year Total Expenditure



Source: GHEITI's construct based on data from GNPC

In 2022, spending increased again to approximately US$17.36 million, reflecting renewed technical engagement and operational activity. This second peak reinforces the observation that expenditure levels were driven primarily by the timing of major technical interventions. In the final years of the review period, 2023 (US$3.80 million) and 2024 (US$1.74 million), expenditure levels declined but remained positive, consistent with ongoing oversight, procurement, regulatory compliance, and administrative support.

Across the entire period, direct costs dominated annual expenditure, while indirect costs remained comparatively stable, indicating that year-on-year fluctuations were driven by operational requirements rather than administrative expansion.

Composition of Expenditure by Major Cost Components

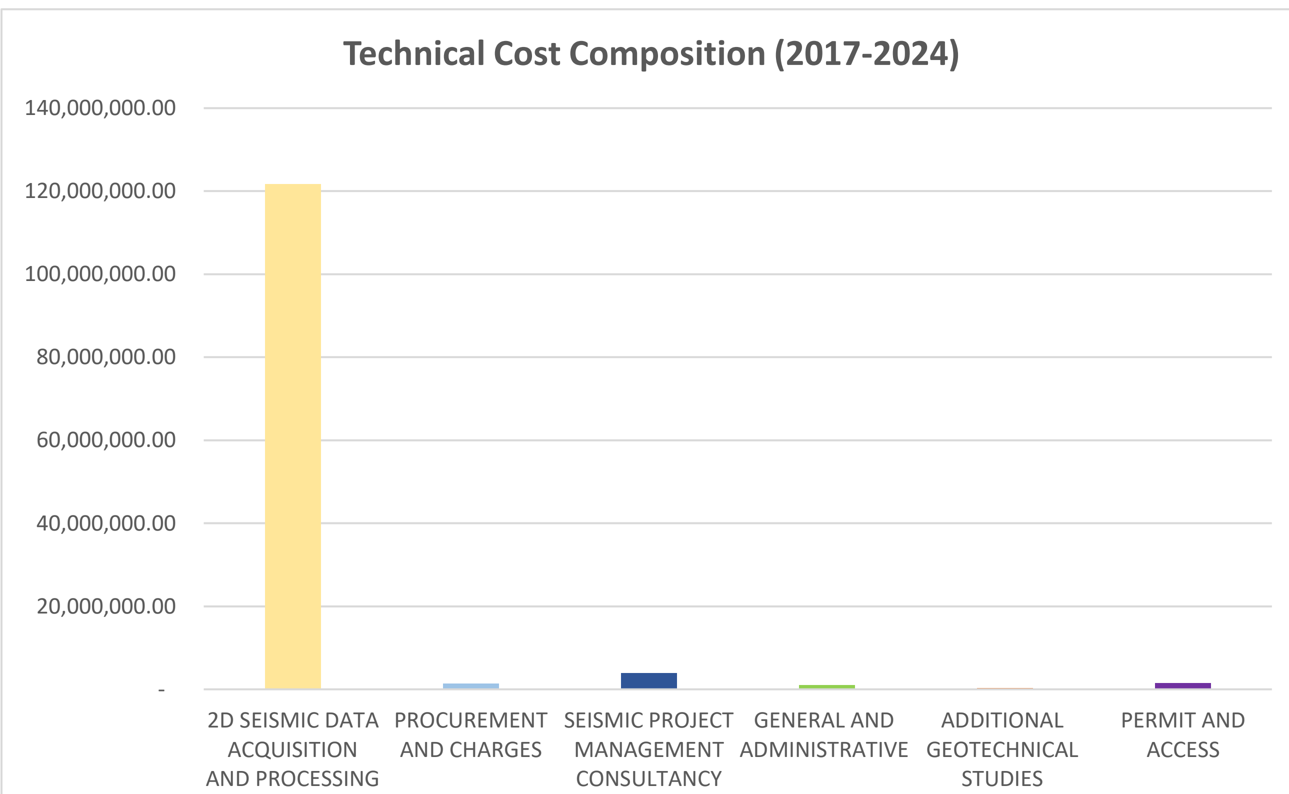
2D Seismic Data Acquisition and Processing

Expenditure on 2D seismic data acquisition and processing represents the largest financial commitment within the programme. Cumulative spending on this component amounts to US$121,655,692.97, accounting for approximately 73 percent of total programme expenditure and the overwhelming majority of direct costs.

The dominance of seismic expenditure explains the pronounced volatility observed in annual spending. Years with the highest total expenditure, notably 2019 and 2022, coincided with periods of active seismic operations. These activities are inherently capital-intensive, involving extensive field deployment, specialised equipment, data processing, and interpretation.

While seismic data generation is undeniably critical, the scale of expenditure suggests a programme design heavily skewed toward data acquisition, potentially at the expense of broader technical or institutional strengthening objectives.

Figure 3.2: Technical Cost Composition (2017-2024



Source: GHEITI’s construct (2025)

Procurement and Charges

Procurement and charges account for a cumulative expenditure of US$1,439,199.22. While modest relative to seismic spending, this component plays a critical supporting role by facilitating logistics, equipment acquisition, and access to specialised services necessary for programme continuity.

Procurement-related costs contributed to maintaining baseline expenditure levels during years with limited seismic activity. In periods such as 2020, 2021, 2023, and 2024, procurement spending helped sustain operations and institutional presence, preventing sharp declines in total expenditure.

The year-on-year data suggest that procurement costs contributed to maintaining minimal operational activity during low-spending years. However, the scale of procurement expenditure appears modest relative to the size and complexity of the programme, raising questions about whether procurement planning was sufficiently aligned with long-term operational needs.

Seismic Project Management Consultancy

Cumulative expenditure on seismic project management consultancy amounts to US$3,864,393.99 with consultancy fee accounting for 76% and consultancy support accounting for 24%. These costs reflect the engagement of specialised technical expertise to plan, coordinate, supervise, and assure the quality of seismic and related technical activities.

Consultancy expenditure closely tracked periods of operational complexity. During years of intensive seismic activity, consultancy costs increased to support oversight and quality assurance. In subsequent years, consultancy spending moderated but remained relevant, supporting evaluation, reporting, and institutional learning. Although consultancy represents a relatively small share of total expenditure, its role in safeguarding technical integrity and preventing inefficiencies is significant.

General and Administrative Costs

General and administrative expenditure totals US$977,854.10, representing a very small proportion of overall programme spending. Administrative costs remained stable throughout the review period, with no sharp increases during years of heightened operational activity.

Additional Geotechnical Studies

Spending on additional geotechnical studies amounts to US$302,873.83. These expenditures supported targeted analytical work aimed at refining geological understanding and informing technical decision-making. Geotechnical studies were undertaken episodically, often following major seismic campaigns, reflecting a logical sequencing of activities from data acquisition to analysis and interpretation.

Permits and Access

Expenditure on permits and access totals US$1,512,853.31, covering costs related to regulatory approvals, land access arrangements, and compliance requirements. Although small in financial terms, these costs are operationally significant, as delays in regulatory processes can have disproportionate impacts on project timelines and overall costs. Their recurrence across multiple years reflects the ongoing nature of regulatory engagement.

Direct and Indirect Cost Structure

Cumulative financial records indicate that total direct costs amounted to US$144,595,560.54, while total indirect costs amounted to US$21,764,897.96. Direct costs therefore account for approximately 87 percent of total expenditure, with indirect costs representing about 13 percent. Even during peak spending years, indirect costs did not rise disproportionately, suggesting that administrative functions were scaled efficiently in line with operational demands.

On the whole, the expenditure patterns observed between 2017 and 2024 reveal a programme marked by high financial concentration on seismic data acquisition.

3.1.3 West Cape Three Points Block 2

Following the arbitration ruling delivered in July 2024, the MoE (now Ministry of Energy and Green Transition) directed Springfield to conduct appraisal activities on Afina discovery in accordance with relevant provisions of the WCTP-2 PA and relevant Laws.

Springfield together with GNPC and GNPC Explorco subsequently commenced appraisal operations on the Afina discovery in October 2024 with the main objective of conducting a flow test on the Cenomanian level oil discovery in Afina 1X. The contractor informed the Ministry that the discovery is commercial.

In a press statement issued on 25th February, 2025, the Minister for Energy and Green Transition, announced the withdrawal of directives initially mandated on 9th April, 2020, 14th October, 2020, and 6th November, 2020, which had compelled the two companies to unitise their operations. This decision came after a thorough review of the Arbitral Award (SCC Arbitration U2021/114: ENI & Vitol v. Ghana & GNPC) dated 8th July, 2024, and a legal opinion from the Attorney General and Minister of Justice.

3.1.4 Saltpond Decommissioning Project

As a result of the project cost overruns and a revised completion date, the contractor demobilized the LB Fugar Barge on 13th December, 2023 and the two supply vessels on 11th April, 2024 from the decommissioning site to Nigeria. GNPC is in the process of procuring the services of a third-party verification company to investigate the revised schedule for the completion of the project from 202 days to 342 days as the base case and a variation of US$81,110,000.00 which translates to approximately 110.3 percent of the original contract sum of US$73,581,227.88. The specific tasks to be carried out by the third party are as follows:

a. Review and advise on the latest schedule, cost estimates and outstanding scope of the project;

b. Review and advise on the claims and cost variations submitted by the Contractor;
c. Review the current dismantling methodology and propose cost-effective alternatives if any;
d. Validate the quantum of work remaining, including variations in scope, schedules, and project costs submitted by the contractor, and provide recommendations on the way forward;
e. Review the executed Plugging and Abandonment (P&A) operations including all the logs, daily reports, P&A programmes, etc. and provide assurance on the integrity of the wells;
f. Review the existing contract between the GNPC and the Decommissioning Contractor and identify gaps and recommend appropriate remedies; and
g. Review all relevant project documentation received from the Contractor and advise on the way forward.

3.2 Production Data

The Ghana National Petroleum Corporation (GNPC) uses the PI System by AVEVA to support real-time monitoring, analysis, and optimisation of oil and gas production. The PI System is an industrial data platform widely used in the oil and gas, energy, manufacturing, and chemical industries to collect, store, analyse, visualise, and share real-time operational data. Since its installation in 2012, the Production Engineering Department at GNPC has significantly improved its well surveillance capabilities. Real-time access to critical production data such as wellhead pressures, flow rates, and temperatures has allowed engineers to monitor field performance independently, without having to wait on periodic updates from the operator. The PI System has transformed GNPC's surveillance from a reactive task to a continuous, insight-driven process, greatly enhancing operational oversight and decision-making efficiency, enabling GNPC to quickly detect deviations or anomalies in well and system behaviour, respond promptly to production issues or equipment concerns, always maintain up-to-date awareness of current field conditions and improve collaboration across disciplines through shared, transparent data.

For the year 2023, there was a decline in production from a total of 48,247,037 bbls as was produced from the three producing fields. This was lower than the 2022 figure of 51,756,481 bbls by 6.7 percent and lower than the 2023 Benchmark crude oil output of 52.61 million barrels by 8.3 percent. The rather low output for 2023 was due to declining crude oil production from all three fields.

The production data is systematically disclosed by the Petroleum Commission and GNPC on their respective websites[30]

3.2.1 Jubilee Field

In 2023, Jubilee Field produced 30,444,217 bbls of crude oil, compared to 30,523,813 bbls of crude oil in 2022. The Jubilee Field continues to contribute to about half the total national output, even though there was a decline of 0.26 percent in crude oil production on an annual basis. The highest monthly production volume on the Jubilee Field was recorded in August and the lowest in February, as shown in Table 3.1.

30 gnpcghana.com/download/ar/annual_report2024.pdf

Table 3.1: Jubilee Field Monthly Production Data 1st Jan – 31st Dec., 2023

MONTHS	JUBILEE Field Oil, Barrels	Daily Average, Barrels
Jan	2,402,046	77,485
Feb	1,993,443	71,194
Mar	2,105,550	67,921
Apr	1,997,685	66,590
May	2,138,846	68,995
Jun	2,475,623	82,521
Jul	2,760,625	89,052
Aug	3,036,877	97,964
Sep	3,028,518	100,951
Oct	2,982,914	96,223
Nov	2,743,738	91,458
Dec	2,778,352	89,624
TOTAL	**30,444,217**	

Source: GNPC

3.2.2 Tweneboa-Enyenra-Ntomme (TEN) Fields

In 2023, the TEN Field produced 6,716,278 bbls of crude oil, compared to a 2022 output of 8,612,822 bbls. This represents a 22 percent decline in production, which was largely attributed to poor reservoir performance. The highest monthly production volume on the TEN Field was recorded in March, and the lowest in July as shown in Table 3.2.

Table 3.2: TEN Fields Monthly Production Data 1st Jan – 31st Dec.2023

MONTHS	TEN Field Oil, Barrels	Daily Average, Barrels
Jan	632,719	20,410
Feb	564,828	20,172
Mar	633,859	20,447
Apr	608,004	20,267
May	610,071	19,680
Jun	576,514	19,217
Jul	206,471	6,660
Aug	574,256	18,524
Sep	611,204	20,373
Oct	586,893	18,932
Nov	538,056	17,935
Dec	573,403	18,497
TOTAL	**6,716,278**	

Source: GNPC

3.2.3 Sankofa-Gye Nyame Project

In 2023, the Sankofa-Gye Nyame Project (SGN) Field produced 11,086,542 bbls of crude oil, compared to a 2022 output of 12,619,846 bbls. This represents a decline of 12 percent that can be attributed to water cut issues post acid simulation which has the potential to increase the amount of water being produced thus affecting oil production. The highest monthly production volume on the SGN Field was recorded in July and the lowest in September as shown in Table 3.3.

Table 3.3: SGN Fields Monthly Production Data 1st Jan – 31st Dec.2023

MONTHS	SGN Field Oil, Barrels	Daily Average, Barrels
Jan	999,551.15	32,243.59
Feb	851,140.22	30,397.87
Mar	992,083.45	32,002.69
Apr	997,396.86	33,246.56
May	1,003,021.35	32,355.53
Jun	869,697.78	28,989.93
Jul	1,003,084.04	32,357.55
Aug	968,367.46	31,237.66
Sep	777,851.64	25,928.39
Oct	902,776.92	29,121.84
Nov	866,955.94	28,898.53
Dec	854,614.80	27,568.22
TOTAL	**11,086,542**	

Source: GNPC

GHEITI'S Observation and Recommendation

Ghana's crude oil output has declined from its highest point of 71 million barrels in 2019 to 48 million barrels in 2023 with production falling for four consecutive years since 2019. Although GHEITI acknowledges that all 3 fields are in their mature stages of production and as such declines in production are to be expected, the MSG is particularly concerned about the general lack of investment in the upstream sector which would not only lead to new discoveries being developed but also reduce risks in the country's offshore basin by acquiring more data.

In the last two years, Ghana's upstream petroleum sector has struggled to attract new investment due to stalled licensing rounds, regulatory disputes, and unresolved project delays. Key cases include the Sankofa-Afina fields unitisation dispute between Eni and Springfield and the resulting misunderstandings between Eni and the state, which affected upstream investments of the biggest oil company in Ghana, Aker Energy's delayed Pecan project, the absence of new petroleum agreements since 2018 and the exit of ExxonMobil in 2021.

The GHEITI MSG also highlights that disagreements over fiscal policy, caused by unclear guidelines and limited consultation with wider stakeholders such as the Tullow Oil versus GRA dispute regarding branch profit tax that proceeded to arbitration in London in 2023, and the enactment of the Growth and Sustainability Levy Act, 2023 (Act 1095) which imposed an additional one percent tax on gross production of International Oil Companies (IOCs) generate uncertainty for prospective upstream investors.

Conversely, the more favourable fiscal framework, fast-track approvals, and strategic national investment in energy infrastructure in neighbouring Ivory Coast have made it a more appealing destination for upstream oil and gas investment. The Baleine discovery by ENI in 2021 saw ENI commit US$10 billion in investment to develop the field, which led to commercial production beginning in August 2023.

Recommendations

- The Ministry of Finance should ensure fiscal predictability.
- The Petroleum Commission should ensure regulatory certainty, contract sanctity, and avoid retroactive application of new laws.
- A thorough examination of Ghana's regulatory system to eliminate bottlenecks causing project delays is essential for the country to maximise benefits from prospective investors.
- Taking a more consultative approach when introducing and implementing policies might prevent expensive arbitration procedures that damage the nation's image as an attractive place for investment.
- Petroleum Commission should ensure the acquisition of high-quality data
- Petroleum Commission should consider investing in basic exploration infrastructure to attract private investments into exploration while reducing the associated cost for investors

3.3 Export Data

This section covers exports of crude oil from Ghana's three producing fields. The term liftings is used to represent exports.

3.3.1 Jubilee Field

In 2023, Jubilee Partners lifted thirty-two (32) parcels totalling 30,403,546 barrels marking a 0.14 percent decrease from thirty-two (32) parcels totalling 30,445,289 barrels, lifted in 2022.

GNPC lifted five (5) parcels, amounting to 4,714,438 barrels, on behalf of the Ghana Group, representing 15.51 percent of total liftings. This was a 16.61 percent decrease from the six (6) parcels, totalling 5,653,497 barrels, lifted in 2022 as shown in Table 3.4.

Table 3.4: Jubilee Field Liftings 1st Jan – 31st Dec. 2023

2021 GREATER JUBILEE FIELD CRUDE OIL LIFTING			
PARCEL NO.	**DATES**	**QUANTITIES, BBLS**	**LIFTING PARTY**
JC-0324	10th January 2021	948,596	**TULLOW GHANA LTD.**
JC-0325	24th January 2021	948,648	**ANADARKO/OXY & PETRO SA**
JC-0326	12th February 2021	962,793	**KOSMOS ENERGY**
JC-0327	21st February 2021	952,311	**TULLOW GHANA**
JC-0328	6th March 2021	995,549	**GHANA GROUP**
JC-0329	20th March 2021	950,738	**ANADARKO/OXY & PETRO SA**
JC-0330	2nd April 2021	949,630	**TULLOW GHANA**
JC-0331	14th April 2021	948,120	**KOSMOS ENERGY**
JC-0332	27th April 2021	948,888	**GHANA GROUP**
JC-0333	11th May 2021	973,351	**TULLOW GHANA**
JC-0334	24th May 2021	952,669	**ANADARKO/OXY & PETRO SA**
JC-0335	8th June 2021	948,982	**KOSMOS ENERGY**
JC-0336	20th June 2021	951,914	**TULLOW GHANA**
JC-0337	4th July 2021	918,603	**ANADARKO/OXY & PETRO SA**
JC-0338	16th July 2021	948,499	**GHANA GROUP**
JC-0339	28th July 2021	908,386	**TULLOW GHANA**
JC-0340	9th August 2021	951,601	**KOSMOS ENERGY**
JC-0341	21st August 2021	951,513	**ANADARKO/OXY & PETRO SA**
JC-0342	3rd September 2021	950,600	**TULLOW GHANA**
JC-0343	15th September 2021	948,096	**GHANA GROUP**
JC-0344	27th September 2021	949,650	**ANADARKO/OXY & PETRO SA**
JC-0345	9th October 2021	947,680	**TULLOW GHANA**
JC-0346	21st October 2021	947,643	**KOSMOS ENERGY**
JC-0347	1st November 2021	950,259	**TULLOW GHANA**

2021 GREATER JUBILEE FIELD CRUDE OIL LIFTING			
PARCEL NO.	**DATES**	**QUANTITIES, BBLS**	**LIFTING PARTY**
JC-0348	13th November 2021	987,820	**ANADARKO & PETRO SA**
JC-0349	26th November 2021	967,619	**KOSMOS ENERGY**
JC-0350	8th December 2021	948,033	**GHANA GROUP**
JC-0351	20th December 2021	952,453	**TULLOW GHANA LIMITED**
JC-0352	30th December 2021	952,739	**ANADARKO & PETRO SA.**
TOTAL		**27,613,383**	

Source: GHEITI's construct based on information from GNPC

3.3.2 Tweneboa-Enyenra-Ntomme (TEN) Field

In 2023, the TEN partners lifted seven (7) parcels, totalling 6,883,220 barrels, marking a 21.22 percent decrease from the nine (9) parcels, totalling 8,736,805 barrels lifted in 2022.

GNPC lifted two (2) parcels, totalling 1,989,887 barrels, on behalf of the Ghana Group, representing 28.91 percent of total liftings. This was a 100 percent increase from the one (1) parcel of 994,962 barrels, lifted in 2022. The Table 3.5 shows the oil liftings for Tweneboa-Enyenra-Ntomme (TEN)

Table 3.5: TEN Field Lifting Schedule 1st Jan – 31st Dec. 2023

2023 TEN FIELD CRUDE OIL LIFTING			
PARCEL NO.	**DATES**	**QUANTITIES, BBLS**	**LIFTING PARTY**
TC-0113	29th January 2023	951,946	**TULLOW GHANA /PSA**
TC-0114	3rd April 2023	994,481	**TULLOW GHANA/PSA**
TC-0115	22nd May 2023	995,409	**GHANA GROUP**
TC-0116	26th July 2023	956,591	**TULLOW GHANA /PSA**
TC-0117	13th September 2023	995,143	**KOSMOS ENERGY**
TC-0118	1st November 2023	995,172	**TULLOW GHANA/PSA**
TC-0119	23rd December 2023	994,478	**GHANA GROUP**
TOTAL		**6,883,220**	

Source: GHEITI's construct based on information from GNPC

3.3.3 Sankofa-Gye Nyame Field

In 2023, eleven (11) parcels, totalling 10,584,255 barrels, were lifted from the SGN Field, representing a 18.93 percent decrease from the fourteen (14) parcels, totalling 13,055,285 barrels, lifted in 2022.

GNPC lifted three (3) parcels, amounting to 2,893,937 barrels, on behalf of the Ghana Group, one of which was a royalty lifting. This represented 27.34 percent of the total liftings. This was a 5 percent increase from the three (3) parcels, totalling 2,756,209 barrels, lifted in 2022, one of which was a royalty lifting as shown in Table 3.6

Table 3.6: 2023 Sankofa Gye Nyame Field Crude Oil Lifting

2023 SANKOFA GYE NYAME FIELD CRUDE OIL LIFTING			
PARCEL NO.	DATES	QUANTITIES, BBLS	LIFTING PARTY
SGNC-0085	28th January 2023	949,319	**ENI GHANA**
SGNC-0086	26th February 2023	948,631	**GNPC**
SGNC-0087	31st March 2023	949,166	**VITOL**
SGNC-0088	28th April 2023	948,848	**ENI**
SGNC-0089	29th May 2023	948,881	**GoG ROYALTY**
SGNC-0090	13th July 2023	903,515	**ENI GHANA**
SGNC-0091	26th July 2023	949,043	**VITOL**
SGNC-0092	28th August 2023	996,852	**ENI**
SGNC-0093	4th October 2023	996,311	**VITOL**
SGNC-0094	9th November 2023	997,264	**ENI**
SGNC-0095	11th December 2023	996,425	**GNPC**
TOTAL		**13,055,285**	

Source: GHEITI's construct based on information from GNPC

3.4 Greenhouse Gas Emissions

Regulatory Framework for GHG Emissions in Ghana

In Ghana, the regulation and monitoring of greenhouse gas (GHG) emissions fall under the mandate of the Environmental Protection Agency (EPA), pursuant to the Environmental Protection Authority Act, 2025 (Act 1124) and the Environmental Assessment Regulations, 1999 (L.I. 1652). Oil and gas companies are required, as part of their environmental permitting and compliance obligations, to submit periodic environmental reports to the EPA, which include data on air emissions and other environmental parameters.

Within Ghana's broader climate governance architecture, emissions data submitted to the EPA also contribute to national climate reporting processes, including Ghana's National Greenhouse Gas Inventory and reporting obligations under the United Nations Framework Convention on Climate Change (UNFCCC).

GHEITI's Observation

The GHEITI Multi-Stakeholder Group (MSG) observes that although oil and gas companies operating in Ghana submit emissions-related data to the EPA, these reports are not routinely published or disaggregated at the company or project level for public access. Consequently, GHEITI was unable to independently obtain verifiable, company-specific GHG emissions data for the oil and gas sector for the 2023 reporting year.

The MSG notes that this limitation reflects an institutional disclosure gap, rather than non-compliance by reporting entities. At the time of reporting, there was no established public-facing platform through which GHG emissions data submitted to the EPA can be accessed by stakeholders in a consistent and transparent manner.

Recommendations:

The MSG recommends that the Environmental Protection Authority (EPA) publishes an annual disaggregated greenhouse gas (GHG) emissions summary for the oil and gas sector, based on emissions data already submitted by companies, as part of EPA's existing annual reporting outputs.

The MSG further recommends that the EPA establishes a dedicated webpage to serve as a central access point for GHG emissions information, including disclosure outputs, sector-level emissions trends over time, and explanatory notes on GHG reporting requirements and data use in national climate reporting.

SECTION FOUR: REVENUE COLLECTION

This section provides comprehensive disclosure of company payments and/or government revenues from oil and gas as the basis for detailed public understanding of the contribution of the extractive industries to government revenues. The EITI standard requirements for oil and gas revenue collection include: (4.1) Comprehensive disclosure of taxes and revenues; (4.1.1) Treatment/Use of Revenues; (4.1.2) Revenue Disclosure and Reconciliation; (4.1.3) Contribution of Revenue Streams to Government Receipts; (4.1.4) Total Government Revenue in 2023; (4.2) Sale of State's share of production or other revenue collections in-kind; (4.3) Infrastructure provisions and barter arrangements; (4.4) Transportation revenues; (4.5) Transactions related to State Owned Enterprises(SOEs); (4.6) Subnational payments; (4.7) Level of disaggregation; (4.8) Data timeliness; (4.9) Data quality and assurance; and (4.10) Project Cost.

4.1 Comprehensive Disclosure of Taxes and Revenues

The collection of revenues and taxes in Ghana's oil and gas sector is governed by the Petroleum Revenue Management Act, 2011 (Act 815) as amended, and the Income Tax Act, 2015 (Act 896) as amended.

According to the PRMA, proceeds from the sale of upstream petroleum must be lodged into the Petroleum Holding Fund (PHF) maintained at the Bank of Ghana in accordance with Section 2(2) of the Act for onward distribution. See Figure 5.1 in Chapter 5 for description of the sources and management of petroleum revenues.

The Ghana Revenue Authority (GRA) is required under Section 3 of the PRMA to assess, collect, and account for petroleum revenue due Ghana derived from direct and indirect participation in oil and gas operations. Payments into the Petroleum Holding Fund (PHF) are made by the 15th day of the ensuing month by the relevant entities.

The sources of revenues to be collected are further specified under Sections 6 and 7 of the PRMA as follows:

- Royalties from oil and gas, additional oil entitlements, surface rentals, other receipts from petroleum operations, and proceeds from the sale or export of petroleum;
- Any revenue from the government's direct or indirect participation in petroleum operations;
- Corporate income taxes from upstream and midstream petroleum companies;
- Any payments by the National Oil Company (NOC) such as Corporate Income Tax (CIT), royalty, dividends, or any other amounts due under Ghanaian law;
- Any additional revenue the government receives directly or indirectly from petroleum resources not mentioned in paragraphs (a) to (d), including capital gains tax from the sale of exploration, development, and production rights; and
- Carried and Additional Participating Interest (CAPI) after deducting equity financing and the cash or equivalent barrels ceded to the NOC from CAPI as recommended by the Minister and approved by Parliament.

Other collections by the GRA, such as employee income taxes (PAYE), are deposited into the Consolidated Fund, while collections of environmental and related permitting fees by the EPA, training and technology support fees by the Petroleum Commission (PC), data, permit, license, and related fees by the Petroleum Commission are treated as Internally Generated Funds (IGF).

In line with the PRMA, the Bank of Ghana and the Ministry of Finance are required to disclose receipts into the PHF. The Minister is required under Section 8 to publish the records of petroleum receipts in the Gazette and simultaneously in two national dailies within 30 calendar days after the end of each applicable quarter. The Minister is also required under Section 48(1) to present an annual report on the petroleum funds as part of his presentation of the Budget and Economic Policy of government. The Central Bank is required under Section 28(2) of the PRMA to publish semi-annual reports on the 15th February and 15th August every year on the Heritage and Stabilization Funds which often includes disclosure of proceeds of liftings as well as other receipts such as corporate taxes, surface rentals and PHF income.

The links to the reports can be accessed via: https://www.bog.gov.gh/wp-content/uploads/2023/07/Semi-Annual-Report-H1-2023.pdf

https://www.bog.gov.gh/wp-content/uploads/2024/01/Semi-Annual-Report-H2-2023-v1-PUBLIC.pdf

https://www.bog.gov.gh/wp-content/uploads/2024/07/Semi-Annual-Report-H1-2024.pdf

https://www.bog.gov.gh/wp-content/uploads/2025/01/Semi-Annual-Report-H2-2024.pdf

GHEITI's Observation

GHEITI has observed that, though Section 48(1) of the PRMA requires the Minister for Finance to prepare a reconciliation report on the petroleum funds and submit same to Parliament as part of the presentation of the annual national budget statement, and to describe in the report, the stage of implementation of all oil-funded projects, this requirement was not complied with between 2011 and 2017. The infraction was brought to the attention of Parliament in 2017, at the joint Committee sitting of Mines and Energy and Finance. After extensive deliberation on the matter, the committee instructed the Minister to take steps to comply with the law in its next report or risk the rejection of the report in 2018.

In 2018, an attempt was made to comply with the requirement in question by stating percentages of completion of projects funded with oil revenue. It is GHEITI's view that stating percentage completion does not adequately respond to the requirement to "describe" the state of completion.

In 2023, the Minister in his Reconciliation Report on the petroleum funds, again failed to describe the state of completion of all-funded projects.

It appears that, the inability of the finance ministry to keep faith with this requirement is as a result of the thinly spread of projects financed with oil revenue.

Recommendations

1. GHEITI wishes to entreat Parliament to ensure full compliance with Sect. 48(1) of the Petroleum Revenue Management Act, mandating a description of the state of completion of all oil-funded projects.

2. To help with compliance with the requirement to describe the state of completion of oil-funded projects, the Minister for Finance is encouraged to limit the spread of oil-funded projects to a few legacy infrastructure undertakings.

4.1.1 Allocation of Revenues

The PRMA provides the basis for the allocation and disbursement of petroleum revenue from the PHF. Finds from the PHF are disbursed in order of priority to the National Oil Company (GNPC), the Annual Budget Fundng Amount (ABFA) and the Ghana Petroleum Funds (made up of the Ghana Heritage Fund and the Ghana Stabilization Fund). GNPC receives two allocations, namely levels A and B. Level A receipts are in respect of GNPC's equity holding on behalf of the government whilst level B is for GNPC's operational expenditure. For a provisional period of up to 15 years from the commencement of oil production, the PRMA stipulates that Level B allocations should not exceed 55 percent of net CAPI, after deducting Level A expenditures. The amount ceded to GNPC is recommended by the Minister and approved by Parliament every three years. The percentage of actual allocations was initially set at 40 percent and later reviewed to 30 percent. In the 2025 Budget and Economic Policy Statement, the Minister for Finance as part of broader expenditure measures to ensure fiscal consolidation, reduced GNPC's share of net CAPI from 30 percent to 15 percent.

The ABFA receives not more than 70 percent of the benchmark revenue for budgetary support. The ABFA expenditure is guided by the long-term national development plan and in its absence, the Minister may determine four (4) priority areas every three years. The Minister for Finance presented new Priority Areas for 2023 – 2025 in the 2023 Budget Statement and Economic Policy which were subsequently approved by Parliament. These included;

- Agriculture including Fisheries
- Physical Infrastructure and Service Delivery in Education and Health
- Road, Rail and Other Critical Infrastructure Development
- Industrialisation

Besides the priority areas, the ABFA also contributes to the Ghana Infrastructure Investment Fund, a special purpose vehicle for strategic infrastructure investment and receives up to 25 percent of ABFA.

The GPF is made up of the GHF and the GSF which constitute Ghana's sovereign wealth funds in the petroleum sector and managed and invested respectively for the purposes of intergenerational equity (savings for future generations) and economic stabilization during periods of unanticipated revenue shortfalls. Not less than 30percent of the benchmark revenue goes to the Ghana Petroleum Funds, which is shared between the Ghana Stabilization Funds (GSF) (21 percent) and the Ghana Heritage Fund (GHF) (9 percent). Section 23(3) of the PRMA and the subsequent amendment of Section 12(5) in 2015, has given the finance minister the authority to cap the stabilization fund and use the excess to pay debt and for contingency purposes. GHEITI in its previous reports have raised questions about the utilization of Ghana Stabilization, and its capping to US$100 million dollars by successive Finance Ministers and the lack of adherence to the capping formular of three years moving average of ABFA all of which have worked together to stifle the growth of the GSF.

4.1.2 Revenue Disclosure and Reconciliation

Table 4.1: Revenue flows in the Oil And Gas Sector

REVENUE FLOWS WITHIN THE OIL/GAS SECTOR AT THE TIME OF SCOPING	
REVENUE STREAMS	**RECEIVING AGENCY**
Corporate Income Tax/Petroleum Income Tax Withholding Tax Pay-As-You-Earn Value Added Tax Excise Duty Import Duty Capital Gain tax Surface rental Royalty Initial participating Carried Interest Surface Rental Additional participating interest Additional Oil Entitlement Bonus as may be prescribed	Ghana Revenue Authority
EPA Permit and Processing Fees	EPA
Data Licence fees Training obligations Technology and technical support Licence Application Production Permit Installation fees Extension fees Application for security clearance for vessels drilling &Well Designation Permit (Per Well)	Petroleum Commission/GNPC
Port/Shorebase costs	Ghana Ports and Harbour Authority

Source: GHEITI's construct

4.1.2.1 Scoping/Materiality Determination

This section presents the reporting parameters for the 2023 EITI Oil and Gas Report. It outlines the options offered to the MSG for setting materiality thresholds during the initial stages. Additionally, it outlines the methods for ensuring the credibility of data supplied by the reporting entities. The GHIETI MSG generated a scoping document for GHEITI's 2023 Oil and Gas sector reports, offering various materiality threshold options derived from revenue streams obtained through preliminary payment data from government agencies. The Report additionally proposed recommendations for ensuring the credibility of data and determining the threshold beyond which discrepancies are not subject to further investigation.

Activities that were undertaken culminating in the determination of materiality thresholds include:

- Collection of total oil and gas revenues, production, and export information from GRA and the PC;

- Analysis of the aforementioned data to form the basis for the determination of materiality threshold for the MSG's consideration;
- Proposed revenue and payment streams to be covered in the report based on the materiality threshold and level of disaggregation; and
- Proposed list of entities required under the materiality to participate in the reconciliation exercise i.e in-scope and out-scope companies.

Additionally, the means of assuring credibility for the data provided by reporting entities and cut off points at which no further investigation of discrepancies are to be undertaken are detailed.

The Independent Administrator (IA) produced a scoping document on GHEITI's 2023 Oil and Gas Sector Report based on revenue streams obtained from the preliminary payment data received from government agencies. The scoping study provided options for materiality thresholds to the MSG.

4.1.2.2 Determination of Materiality

Materiality thresholds were determined using the total payments made by Oil and Gas Companies. The proportion of the various revenue streams to total revenues received were determined. The revenue considerations were as follows:

Rationalisation for the exclusion of PAYE and Withholding taxes from Reconciliation

- Withholding taxes and Pay As You Earn (PAYE) were excluded as these were made by the Oil and Gas Companies on behalf of suppliers and companies.
- Total preliminary receipts in the Sector, and those revenue streams used in establishing the materiality thresholds are shown in Tables 4.2 and 4.3 respectively. The MSG were provided with options for determining materiality thresholds (see Table 4.3). Details of Entities or Companies that made payments in 2023 are shown in Appendices 1 & 2.

Table 4.2: Total Preliminary Receipts-2023

Corporate Tax	365,197,536
Withholding Tax	69,978,682
PAYE	19,175,148
Royalty	219,608,785
Carried Interest & Participating Interest	470,673,746
Surface Rentals	771,200
Permit Fees	141,730
Data License Fees	2,139,253
Training Obligations/Fees	6,850,000
Technology and Technical Support	300,000
License Application	-

Corporate Tax	365,197,536
Production Permit (Admin Fee from Producing Companies)	1,320,750
Registration Fees	180,695
Permit to Engage in Petroleum Activities	-
Bidding Permit	-
Installation and Operation of Transportation or Storage Facility	-
Crude Lifting Fee	-
Drilling and Well Designation Permit	9,000
Renewal of Permit	3,521,722
Extension of Exploration Working Period	200,000
Extension of Appraisal Period	-
Approval of Third-Party Access	-
Registration of Assignment of Interest Or Transfer Of Shares	-
Registration of Mortage Of Participating Interest	-
Data Repository Visit	90,000
Supervision, Inspection and Safety Measures	-
Receipt of Administrative Charges	105,488
Offences	-
Exploration and Development Permit	411,890
Administrative Charges	-
Sale of Application Pack & Tender Forms	2,875
Environmental Permitting Fees	991,013
Environmental Processing Fees	126,693
TOTAL	**1,161,796,206**

Source: GHEITI's Construct based on Data from Reporting Entities, 2023

Table 4.3: 2023 Preliminary Receipts for the Determination of Materiality Thresholds

REVENUE	AMOUNT (US$)	WEIGHT (%)	
Corporate Tax	365,197,536.00	34.0465	Reconciled
Carried Interest & Participating Interest	470,673,746	43.8798	Reconciled
Royalty	219,608,785	20.4736	Reconciled
Training Obligations/Fees	6,850,000	0.6386	Reconciled
Renewal of Permit	3,521,722	0.3283	Reconciled
Data License Fees	2,139,253	0.1994	Not Reconciled
Production Permit (Admin Fee from Producing Companies)	1,320,750	0.1231	Not Reconciled
Environmental Permitting Fees	991,013.48	0.0924	Not Reconciled
Surface Rentals	771,200	0.0719	Reconciled
Exploration and Development Permit	411,889.77	0.0384	Not Reconciled
Technology and Technical Support	300,000	0.0280	Not Reconciled
Extension of Exploration Working Period	200,000	0.0186	Not Reconciled
Registration Fees	180,694.91	0.0168	Not Reconciled
Permit Fees	141,730	0.0132	Not Reconciled
Environmental Processing Fees	126,692.85	0.0118	Not Reconciled
Receipt of Administrative Charges	105488.13	0.0098	Not Reconciled
Data Repository Visit	90,000	0.0084	Not Reconciled
Drilling and Well Designation Permit	9,000	0.0008	Not Reconciled
Sale of Application Pack & Tender Forms	2,875.01	0.0003	Not Reconciled
License Application		0.0000	Not Reconciled
Permit to Engage in Petroleum Activities		0.0000	Not Reconciled
Bidding Permit		0.0000	Not Reconciled
Installation and Operation of Transportation or Storage Facility		0.0000	Not Reconciled

REVENUE	AMOUNT (US$)	WEIGHT (%)	
Crude Lifting Fee		0.0000	Not Reconciled
Extension of Appraisal Period		0.0000	Not Reconciled
Approval of Third Party Access		0.0000	Not Reconciled
Registration of Assignment of Interest or Transfer of Shares		0.0000	Not Reconciled
Registration of Mortage of Participating Interest		0.0000	Not Reconciled
Supervision, Inspection and Safety Measures		0.0000	Not Reconciled
Offences		0.0000	Not Reconciled
Administrative Charges		0.0000	Not Reconciled
TOTAL	**1,072,642,374.95**		

Source: GHEITI's Construct Based on Data from Reporting Entities, 2023

4.1.2.3 Revenue Streams

Any revenue stream that recorded at least US$ 3,000,000 was to be reconciled.

The MSG decided that the following revenue streams shown in Table 4.4 should be reconciled for the 2023 GHEITI Report in accordance with the established materiality threshold.

Table 4.4: Revenue Streams for 2023 Reconciliation

NO.	REVENUE STREAM
1.	Corporate Tax
2	Royalty
3	Carried Interest
4	Additional Participating Interest
5	Permit renewal Fees
6	Training Allowance/Fees
7	Surface Rental

Source: GHEITI's Construct Based on Data from Reporting Entities, 2023

These revenue streams together recorded more than 99 percent of the total amount of reconcilable revenue streams. (See Table 4.3)

Surface rental did not meet the materiality threshold, but the MSG included it for legacy reasons. Some oil and gas companies defaulted in the payment of surface rental in the past editions of the report. Its inclusion is therefore to monitor the level of companies' compliance.

Discrepancies Cut Off

It was decided that further investigation about discrepancies shall cease when the discrepancy is equal to or less than 1% of the aggregate revenues (excluding PAYE and withholding tax) i.e. 0.01 of US$1,072,642,374.95. Table 4.5 shows the detailed explanation of revenue streams

Table 4.5: Revenue Streams and their Purpose

SN.	REVENUE STREAM	PURPOSE
1	Royalty	It is a production levy which is based on the gross value of oil and gas extracted, irrespective of profitability.
2	Corporate Income Tax Loss Carried Forward	This is the tax payable on income derived from oil and gas production. The Capital Allowance regime is 20% on a straight-line basis. Expenses ranging from exploration, capital expenditure, development and operational costs prior to the year of commencement of commercial production is accumulated and amortized over a 5year period. Recoverable pre-production expenses relate to exploration, plant and equipment, Fields development comprising of building facilities for oil and gas exploitation such as drilling wells, laying of supporting infrastructure, interest expenses and general and administrative expenses. Petroleum income tax is computed at 35% of the chargeable income derived as follows: Gross Income Less Allowable expenses, Capital allowances and Losses carried forward Allowable expenses include Petroleum royalties, contributions to a decommissioning fund, Rentals, interest expense and charges on sums borrowed for petroleum operations. Under the Income Tax Act, 2015 (Act 896) as amended, losses are carried forward for five years
3	Surface Rental (Acreage Fee)	According to Petroleum (E&P), 2016 (Act 919) and the Petroleum (E&P) (General) Regulations, 2018 (L.I. 2359) Phase of Operation — Surface Rental per Annum Initial Exploration Period — US$ 150 per sq. km 1st Extension Period — US$ 300 per sq. km 2nd Extension Period — US$ 300 per sq. km Development and Production — US$ 600 per sq. km
4	Dividend	Dividends paid by National Oil Company for Government's equity interest.
5	Initial Participating Carried Interest	The Initial Participating Carried Interest means an interest held by the Republic in respect of which the contractor pays for the exploration and development costs without any entitlement to reimbursement from the Republic. However, the republic contributes towards production cost. For the Jubilee, TEN and SGN Fields the Initial Participating carried interest are 10%, 10% and 15% respectively.

SN.	REVENUE STREAM	PURPOSE
6	Additional Participating Interest	This is the interest acquired by the GNPC on behalf of the State after the discovery of oil and gas in commercial quantities. Under this arrangement, the GNPC/ Government of Ghana pays its share of development and production costs. The State or Government of Ghana, however does not contribute towards exploration expenditure.
7	Training Allowance/Obligations	An annual amount paid by Oil and Gas companies to assist in building the capacity of the Regulator of the Sector.
8	Gas Revenue	Gas revenue from the Jubilee Fields paid into the Petroleum Holding Fund
9	Environmental Permitting Fees	Amounts paid to EPA for engaging in activities that impact the Environment negatively.

Source: GHEITI's Construct, 2023

4.1.2.4 Determination of Threshold for Entity Reporting Companies

Appendix 1 shows the total payments made by companies, the percentage contribution to the total payments and the cumulative weight.

Materiality threshold analysis based on company payments made in 2023 are shown in Table 4.6.

The materiality threshold analysis shows, various thresholds of payments and the number of companies that fall within.

Table 4.6: 2023 Materiality threshold Analysis for the selection of companies

THRESHOLD	NO. OF COMPANIES	WEIGHT	CUMULATIVE % COVERAGE	COMMENTS
Amount≥US$500M	1	48.7385	48.7385	1 Company
US$500M≥Amount≥ US$200M	1	22.3389	71.0774	2 Companies
US$200M≥Amount≥ US$90M	2	20.8407	91.9181	3 Companies
US$90M≥Amount≥US$30M	1	3.1144	95.0325	4 Companies
US$30M≥Amount≥US$20M	2	4.3181	99.3506	7 Companies
US$20M≥Amount≥US$1M	1	0.1208	99.4714	8 Companies
US$1M≥Amount≥US$0.5M	1	0.0901	99.5615	9 Companies
US$0.5M≥Amount≥ US$0.1M	11	0.1412	99.7027	20 Companies

Source: GHEITI's Construct, 2023

4.1.2.5 Materiality Statement

Any Oil/Gas Upstream Company that paid at least US$ 20,000,000 of the relevant (reconcilable) revenue streams in 2023 was required to submit reporting template and to participate in the Reconciliation Exercise (See Tables 4.5 and 4.6)

4.1.2.6 Company Reporting Entities

The In-scope Companies required to complete templates for the 2023 Report are shown in Table 4.7. (see Appendix 1)

Table 4.7: Material (In-scope) Companies for 2023 Reconciliation

NO.	COMPANY	TIN NO.
1	GNPC	V0003107108
2	Tullow Ghana Ltd.	C0002551888
3	Kosmos Investments Ghana Ltd	C0003168417
4	Kosmos Energy Ghana HC	C0003831426
5	ENI Ghana Exploration & Production Limited	C0003664996
6	Vitol	C0004743520
7	PetroSA Ghana Limited	C0021485674

Source: GHEITI's Construct, 2023

4.1.2.7 Reporting Government Agencies

The Government Agencies that are to contribute to the Reconciliation Exercise are:

- Ghana Revenue Authority
- Ministry of Finance
- Bank of Ghana
- Petroleum Commission
- Ghana National Petroleum Corporation (GNPC)

The MSG's relevant scoping decisions have been summarised in Table 4.8 as follows. (see Appendices 1&2)

Table 4.8: Scoping decisions for 2023 GHEITI Oil/Gas Report

Parameter	2023
Materiality Threshold for Oil/Gas sector	USD20,000,000
Coverage: In-scope (Material) Companies' Payments to Total Receipts (Excluding PAYE and Withholding Taxes)	98.04%

Parameter	2023
Coverage: In-Scope Companies' Payments to Total Receipts (Including PAYE and Withholding Taxes)	90.52%
Number of In Scope Companies	7
Reporting Government Entities	-Ghana Revenue Authority -Ghana National Petroleum Corporation -Petroleum Commission -Ministry of Energy -Ministry of Finance -Environmental Protection Authority

Source: GHEITI's Construct, 2023

Observation
The IA's earlier scoping study led to the selection of six (6) In-scope Companies. Subsequently, additional data on the US$120,965,283 corporate tax payment made by Kosmos Energy Ghana Investment Ltd warranted fresh threshold analysis. As a result, Kosmos Energy Investments Ghana Ltd. was included as a participating company.

Recommendations

The Government Entities should endeavour to submit all payments received in the year for materiality determination, in addition to providing templates for some selected companies. The comprehensive data should list all the Entities that made those payments.

The GNPC and Kosmos Energy HC are encouraged to report their payments seperately from their subsidiaries, that is, Explorco and Kosmos Energy HC, respectively. Similarly, Kosmos Energy HC payments should be separated from Kosmos Energy Investments Ghana Ltd.

To operationalise the earlier recommendation, the GHEITI MSG should consider inviting Explorco and Kosmos Energy HC to participate in EITI implementation in Ghana and to report directly on their operational activities.

4.1.2.8 Basis of Reconciliation

The reconciliation is on actual basis. Thus, activities that occurred (both Financial and physical) between 1st January 2023 and 31st December 2023 were considered.

Currency
The reporting currency is the United States Dollar (US$)[31] . The exchange rate used was US$: GHS; 1: 11.0232 in 2023.

[31] Most transactions within the Oil/Gas sector are denominated in US dollars.
[32] The rate represents the average exchange of the monthly mid-rate averages for 2023

4.1.2.9 Auditing Standard

The Reconciliation is based on data that has been audited to international auditing standards. Revenues raised in the form of taxes, grants, loans and other finances are deposited in the Consolidated Fund or the Government's Treasury in accordance with the provisions of the Public Financial Management Act, 2016 (Act 921) as amended.

The Government prepares a national budget based on revenue expectations and its policy direction for the year, and present to Parliament for approval. Parliament approves annual expenditure from the consolidated fund through the enactment of an appropriation Act, and without this authority, any expenditure made from the Fund is considered irregular and illegal.

Article 187(2) of the 1992 Constitution of Ghana empowers the Auditor-General of Ghana to carry out the audit of public accounts[33] of Ghana and to report thereon to parliament.

The Auditor-General of Ghana and the Audit Service has completed the audit34 of all participating government Agencies for 2023.

The Audit Service of Ghana is a member of both the International Organisation of Supreme Audit Institutions (INTOSAI) and the Africa Organisation of Supreme Audit Institutions (AFROSAI). It applies the International Standards of Supreme Audit Institutions (ISSAI) issued by INTOSAI in its auditing work. The Audit Service monitors the use and management of all public funds and reports to Parliament annually. The 2023 Auditor-General's Report did not qualify any accounts of the government entities, and the revenue streams required for the 2023 GHEITI Report.

4.1.2.10 Reporting Companies

Section 128 of the Companies Act, 2019 (Act 992), requires Directors of a company to cause to be prepared auditors' report in accordance with Section 137 of the Act. According to Section 128 (1) of the Act, audited financial statements, including profit and loss accounts and balance sheets, should be sent to members and debenture holders of any company.

The 2023 financial statements for all the participating companies including that of GNPC have been audited by Independent Auditors, appointed by the companies and the Auditor-General respectively. These auditors employ auditing standards issued by the International Auditing and Assurance Standards Board. None of the audited financial statements was qualified.

The International Oil Companies (IOCs) that provided data for the report were Kosmos Energy, Tullow (Ghana) Ltd and ENI (Ghana) Ltd. These companies are subsidiaries/branches of companies that are listed on the London and New York stock exchanges. Thus, a stringent data provision regime is required of them.

The annual reports of companies including audited financial statements can be obtained from the links and websites of the companies[35]. The audited financial statements of the GNPC can be

[33] *See also sections 11 and 14 of the Audit Service Act, 2000, Act 584*
[34] *MDAs Press*
[35] KM525 2023 Annual Report.Final.indd

accessed using link[36] Section 4.9 of the report provides further details on data credibility and assurance

4.1.2.11 Templates

The MSG designed templates based on benefit streams of previous reports with options to add other streams. The IA reviewed the templates (both for companies and Government Reporting Entities) and found them satisfactory.

The GHEITI Secretariat distributed and collected data from Companies and Government Agencies using the templates.

4.1.2.12 Data Reliability Check

All templates collected were scrutinised to ensure that they fully meet the requirements set out for the completion of templates. Data reliability was checked against the following:

- Completeness

Templates submitted by participating entities were checked to ensure that all requisite responses have been thoroughly completed.

- Relevance:

Attached documentations such as receipts and schedules were checked for their relevance to figures and periods provided on the templates.

- Correctness/Accuracy

Figures provided on the templates were checked for correctness against receipts or other documentation provided. Also, figures on receipts were summed up to ensure they tally with the figures provided in the templates.

- Certification:

Templates were checked to ensure that they have been properly endorsed by completing officers with appropriate signatories and official stamps. Senior officials, signing templates did so on behalf of the board of directors. It was the position of the MSG that these officials ensure the authenticity of the data provided, as the board of directors are likely to sanction any senior official who provided false data.

4.1.2.13 Discrepancy

The MSG/IA agreed that the cut-off point at which resolution of discrepancies will cease is 1 percent of total government receipts used in determining the materiality (submissions by Government Agencies of reconcilable revenues).

4.1.2.14 Results of Reconciliation

Companies

Vitol and PetroSA did not submit reporting templates despite several reminders. Tullow (Ghana)Ltd, Kosmos Energy, Kosmos Energy Ghana Investments Ltd, ENI (Exploration &

[36] www.gnpcghana.com/download/fr/2023_GNPC_FS.pdf

Production) Ltd and GNPC submitted templates. All the templates/data submitted met the completeness, integrity and reliability tests. (See Section 4.9 on Data Quality)

Government Agencies

The data from Petroleum Commission, GRA and GNPC compared favourably with figures from its audited financial statements. However, there were some differences between GNPC figures and the data from the 2023 Reconciliation Report on the Petroleum Holding Fund which were resolved.

Data quality and Comprehensiveness

There were supporting documents, and despite the presence of some discrepancies, the IA was able to resolve major discrepancies. The data provided were found to be reliable. The data quality was high. Where companies did not present data, unilateral declarations ensured that the data was comprehensive.

Based on the above, the IA concluded that final assessment of the overall comprehensiveness and reliability of reconciled financial data and information from company and Government Agencies to be satisfactory, and that the 2023 Final Report includes reliable and credible information on the revenues.

Reconciliation of Oil and Gas Revenue in 2023

This section presents the reconciliation of payments and receipts in the Oil and Gas Industry at the producing fields of Jubilee, TEN and SGN in 2023. These are:

- Reconciliation of payments/entitlements made in-kind by IOCs and receipts by GNPC
- Reconciliation of payments made by oil companies including GNPC and receipts by the Bank of Ghana/Ministry of Finance but accounted for by the GRA. The payments by GNPC covered Carried Interest, Additional Participating Interest and royalty.

The IOCs' payments for surface rental and Corporate Income Tax (See Tables 4.11 and 4.12)

- Reconciliation of liftings (exports) by IOCs and GNPC to lifting records from the Ghana Revenue Authority (Customs Division).

4.1.2.15 Payment of Royalty by International Oil Companies

Royalty payments by IOCs are received by the government in-kind as per Act 815. This is based on their Participating Interests and royalty rates in their respective blocks or producing fields[37]. In 2023, total royalties paid by the respective partners in the producing fields amounted to US$ 219,610,000. Jubilee Field's contribution was 60 percent, whilst Sankofa and TEN were 31percent and 9 percent, respectively.

[37] *The IA did not obtain the relevant data necessary to determine the royalty in -kind contributed by individual IOCs' and GNPC*

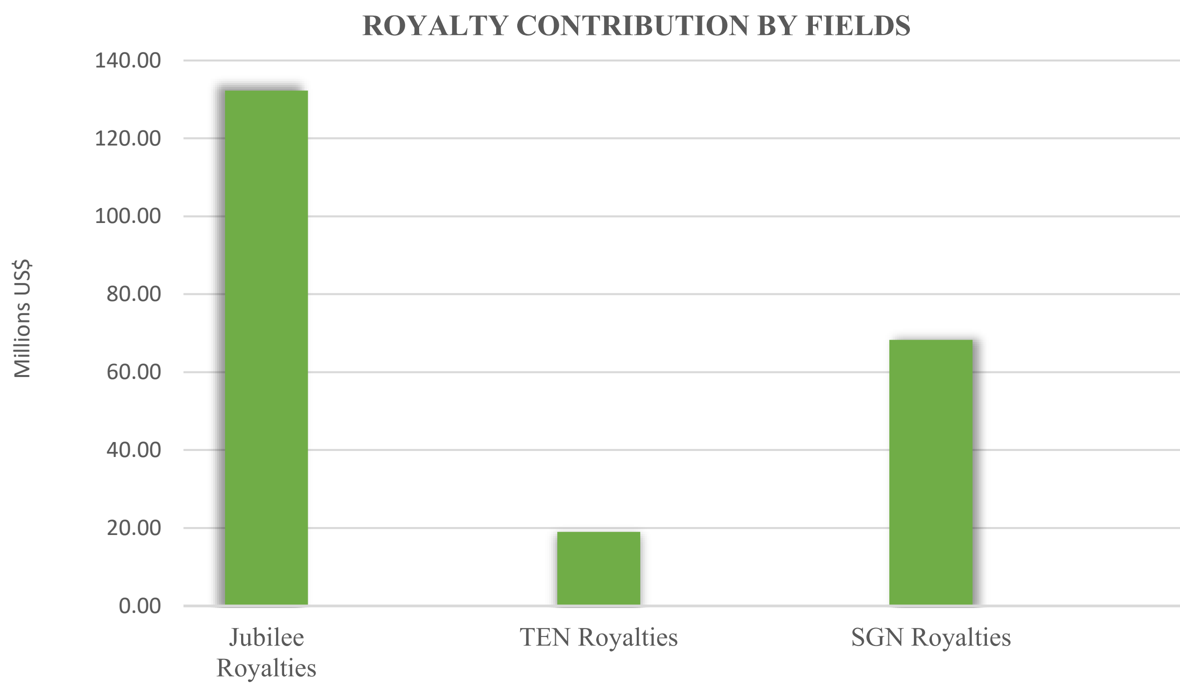
Table 4.9: Contribution of in-kind royalty based on liftings of crude oil in the three producing areas of Jubilee, TEN and SGN

PRODUCING FIELD	ROYALTY (US$)
Jubilee	132,300,000.00
TEN	18,970,000.00
SGN	63,330,000.00
TOTAL	**219,600,000**

Source: MOF/GNPC

Table 4.9 shows the contribution of in-kind royalty based on liftings of crude oil in the three producing areas of Jubilee, TEN and SGN in 2023.

Figure 4.1: Royalty Contribution by Producing Fields in 2023



Source: GHEITI's construct based on reconciled data from GNPC

4.1.2.16 Corporate Tax and Surface Rental Payments made by Oil Companies into the PHF

Surface rental and Corporate Income Tax payments in 2023 by the Oil Companies are shown in Table 4.10.

Table 4.10: Surface Rental and Corporate Tax Payments in 2023

NO.	COMPANY	SURFACE RENTALS (US$)	CORPORATE TAX (US$)
1	ENI Ghana Ltd. (OCTP JOINT ACCT)	19,030.00	
2	ENI Ghana Ltd. (CTP BLOCK-4 JV)	92,980.00	
3	Springfield Exploration and Production	67,300.00	

NO.	COMPANY	SURFACE RENTALS (US$)	CORPORATE TAX (US$)
4	Tullow Ghana Ltd.	77,725.23	157,206,436.00
5	Kosmos Energy Ghana HC.		71,928,857.35
6	Kosmos Energy Ghana Inv.		120,962,283.00
7	Petrosa Ghana Limited		15,099,960.00
8	Goil Upstream Co. Ltd	147,400.00	
9	Aker Energy Ghana Ltd	150,750.00	
10	GNPC Operations Services Ltd	8,725.00	
11	Amni Ghana	13,974.00	
12	Eco Atlantic	92,082.00	
13	AGM Petroleum Gh. Ltd.	26,234.25	
14	Base Energy	75,000.00	
	TOTAL	**771200.48**	**365,197,536.35**

Source: GRA, 2023

4.1.2.17 Reconciliation of Liftings Between GNPC and GRA

Table 4.11 shows the Reconciliation of liftings in 2023 between the GNPC and GRA.

Lifting of crude oil from producing fields is based on a schedule provided by producing partners at the beginning of every year. GNPC lifts crude oil from the three producing fields on behalf of the State. Section 3(1) of the PRMA requires the GRA to assess, collect and account for petroleum revenues.

Table 4.11: Reconciliation of Liftings Data Between GNPC and GRA

	GNPC	GRA	DISCREPANCY
JUBILEE			
Lifting Date	Quantity	Quantity	
18-Feb-23	948,266	948,266	0
28-Apr-23	953,870	953,870	0
11-Jul-23	906,021	906,021	0
18-Sep-23	954,337	954,337	0
27-Oct-23`	954,337	954,337	0
TOTAL	**4,714,438**	**4,714,438**	0
TEN			
22 May 2023	73.385	73.385	0
23-Dec-23	994,478	994,478	0

	GNPC	GRA	DISCREPANCY
TOTAL	1,067,863	1,067,863	0
SGN			
26-Feb-23	948,631	948,631	0
29-May-23	948,881	948,881	0
11-Dec-23	996,425	996,425	0
TOTAL	2,893,937	2,893,937	0

Source: GHEITI (2025)

4.1.2.18 Unilateral Declarations

As stated earlier, although PetroSA and Vitol met the materiality threshold, they failed to submit reporting templates. Table 4.12 shows the payments that were made by PetroSA and Vitol.

These unilateral declarations were made by the government receiving agencies. Payments made by companies that failed to submit templates for reconciliation are shown in Table 4.12.

Table 4.12: Unilateral declarations for 2023 EITI Report.

COMPANY/ GOV'T AGENCY/REVENUE STREAM	GRA (CORPORATE TAX) (US$)	GNPC US$	PETROLEUM COMMISSION (US$)	TOTAL US$
Vitol				
PetroSA	15,099,960			15,099,960
TOTAL	**15,099,960**			**15,099,960**

Source: GHEITI's Construct Based on Data from GRA, 2023

The GRA provided unilaterally corporate tax payment of US$ 15,099,960 on behalf of Petro SA. No data was provided by the GRA on Vitol. GHEITI's checks revealed that Vitol was still recovering its capital allowance and therefore not in a tax paying position.

The Petroleum Commission and GNPC did not provide any data on the two companies. Thus, the two companies did not make any material payments to the Petroleum Commission or GNPC in 2023. Unilateral declaration for the two companies that failed to participate in the reconciliation exercise amounted to US$15,099,960.

Reconciliation

Tables 4.13 and 4.14 provide details of reconciliation by revenue streams and companies respectively.

Table 4.13: Reconciliation by Revenue Streams

	2023		Company			Government			Final Amounts		Unresolved	
No.	Revenue Stream	Paid To	Initial Amount US$	Resolved	Final	Initial Amount US$	Resolved	Final	Company	Government	Over	under
1	Carried Interest	GRA	403,141,908	-60,440,267.57	342,701,641	470,673,746	(127,972,105)	342,701,641.00	342,701,641	342,701,641	-	-
2	Additional Participating Interest	GRA	148,118,861	(20,146,756)	127,972,105	0	127,972,105	127972105	127,972,105	127,972,105	-	-
3	Royalty	GRA	219,608,785	-	219,608,785	219,608,784.84	-	219,608,784.84	219,608,785	219,608,785	-	-
4	Surface Rental	GRA	189,735	-	189,735	189,735	-	189,735	189,735	189,735	-	-
5	Corporate Tax	GRA	354,096,902	0	354,096,902	350,097,576	0	350,097,576	354,096,902	350,097,576	3,999,326	-
6	Training Obligations/fees	PC/GNPC	2,850,000	-	2,850,000	2,850,000	-	2,850,000	2,850,000	2,850,000	-	-
0	Permit renewal Fess	PC	-	0	-	0	0	0	-	0	-	-
	TOTAL		1,128,006,191	(80,587,023)	1,047,419,168	1,043,419,842	-	1,043,419,842	1,047,419,168	1,043,419,842	3,999,326	-

Source: Source: GHEITI's Construct Based on Data from GRA, 2023

Table 4.14: 2023-Reconciliation by Companies

No.		**Company**			**Government**			**Final Amounts**		**Over**	**Under**
	Company	**Initial Amount US$**	**Resolved**	**Final**	**Initial Amount US$**	**Resolved**	**Final**	**Company**	**Government**	Amount reported by company and not corroborated by gov't agency	Amount reported by government agency and not confirmed by company
1	KOSMOS	76,270,327	-	76,270,327	71,928,857	-	71,928,857	76,270,327	71,928,857	4,341,470	-
2	TULLOW	157,634,161	-	157,634,161	157,634,161	-	157,634,161	157,634,161	157,634,161	-	-
3	GNPC	771,169,554	(80,587,023)	690,582,531	690,582,531	-	690,582,531	690,582,531	690,582,531	-	-
4	KOSMOS INVESTMENTS	120,620,139	-	120,620,139	120,962,283	-	120,962,283	120,620,139	120,962,283	(342,144)	-

No.		Company			Government			Final Amounts		Over	Under
5	ENI GHANA E&P LTD	2,312,010	-	2,312,010	2,312,010	-	2,312,010	2,312,010	2,312,010	-	-
6	VITOL	-	-	-	-	-	-	-	-	-	-
	TOTAL	1,128,006,191	(80,587,023)	1,047,419,168	1,043,419,842	-	1,043,419,842	1,047,419,16 8	1,043,419,842	3,999,326	-

Source: GHEITI (2025)

4.1.2.19 Discrepancies

Discrepancies are differences between reported government receipts and company payments. Discrepancies are positive (over) if for the same revenue stream, the amounts reported by a company exceed that reported by the government agencies as receipts. If the amount received by the government agencies exceeds payment by a company, the resulting discrepancy is negative (under). A net discrepancy[38] of US$3,999,326 and absolute discrepancy[39] of US$4,683,614 was obtained.

The net discrepancy represents 0.37 percent of the value of reconcilable revenue streams submitted during reconciliation (that is total preliminary receipts excluding PAYE and withholding tax). The net discrepancy is 0.34 percent of the total preliminary receipts (i.e. revenue streams including PAYE and withholding tax)

4.1.2.20 Resolution of Discrepancies

The resolutions of discrepancies were as follows

- **Resolution of overstated carried and additional Participating interest. (Removal of 2024 receipts): GNPC's initial submissions had carried interest of USD**403,141,908.33 and additional participating interest of USD148,118,861.10. These amounts included sale of Sankofa cargo with proceeds of USD 80,587023.42 comprising carried Interest of USD60,440,267.57 and additional participating interest of USD20,146,755.86 received on 7th January 2024.

To ensure that only revenues received in 2023 are reconciled, the carried and additional participating interest received on 7th January 2024 were removed.

- **Decoupling Carried and Additional Participating Interests**: The GRA provided data which had carried and participating interest together as US$ 470,673,746. The GNPC's data however

[38] *That is the resulting discrepancy after aggregating negative and positive discrepancies*

[39] *Discrepancy obtained when all the negative discrepancies are considered as positive.*

stated Carried interest as US$342,701,641 and additional participating interest as US$127,972,105.ie after removing 2024 receipts.

The additional participating interest figure of US$127,972,105 was used to reduce GRA's amount to establish the carried interest figure of US$342,701,641, thereby splitting the GRA's initial amount to Carried and Additional Participating Interest.

4.1.2.21 Unresolved Discrepancies

Unresolved discrepancies at the end of the reconciliation are shown in Tables 4.15 and 4.16 for revenue streams and companies respectively.

Table 4.15: Unresolved discrepancies by Revenue Streams

	2023 OIL AND GAS	Unresolved	
No.	**Revenue Stream**	**Over**	**under**
1	Carried Interest	-	-
2	Additional Participating Interest	-	-
3	Royalty	-	-
4	Surface Rental	-	-
5	Corporate Tax	3,999,326	-
6	Training Obligations/fees	-	-
7	Permit renewal Fess	-	-
	TOTAL	3,999,326	-

Source: GHEITI (2025)

Table 4.16: Unresolved Discrepancies by Companies

	2023 **OIL AND GAS**	**UNRESOLVED DISCREPANCIES**	
		Over	Under
1	KOSMOS	4,341,470	-
2	TULLOW	-	-
3	GNPC	-	-
4	KOSMOS INVESTMENTS		(342,144)
5	ENI GHANA E&P LTD	-	-
6	VITOL	-	-
	TOTAL	4,341,470	(342,144)

Source: Source: GHEITI (2025)

4.1.2.22 Revenue Streams Contribution to Government Receipts

Contribution of revenue streams to Government receipts is shown in Table 4.17

Table 4.17: Contribution Of The Revenue Streams to Government Receipts in 2023.

REVENUE STREAM	AMOUNT(US$)	PERCENTAGE CONTRIBUTION (%)
Carried Interest	342,701,641	33
Corporate Tax	350,097,576	34
Royalty	219,608,785	21
Additional Participating Interest	127,972,105	12
Training Obligations/fees	2,850,000	0
Surface Rental	189,735	0
Permit renewal Fess	0	0
TOTAL	**1,043,419,842**	

Source: GHEITI (2025)

Corporate income tax provided the highest contribution to government revenues followed by carried interest, royalty and additional participating interest in that order.

Reconciliation Coverage

Coverage for the reconciliation is 98 percent is shown in Table 4.18.

Table 4.18: Coverage for the Reconciliation

Revenue Stream	Total Collected By Government In 2023: A-US$	Total Reported By Government Agencies In 2023 At Reconciliation: B-US$	% Coverage (B/A)
Carried Interest	342,701,641	342,701,641	100
Additional Participating Interest	127,972,105	127,972,105	100
Royalty	219,608,785	219,608,785	100
Surface Rental	771,200	189,735	25
Corporate Tax	365,197,536.00	350,097,576	96
Training Obligations/Fees	6,850,000	2,850,000	42
Permit Renewal Fess	3,521,722	-	0
TOTAL	**1,066,622,989**	**1,043,419,842**	**98**

Source: GHEITI's construct (2025)

4.1.2.23 Effect of Non-Submission of Templates on the Reconciliation Exercise

Unilateral declaration by GRA on receipts from Petro SA in 2023 amounted to US$15,099,960.40. This amount represents 1.41 percent of the total Government receipts used in determining materiality thresholds. It is 0.73 percent of the total preliminary receipts. The coverage of the assignment came up to 98% without the PetroSA corporate tax payment. However, if a unilateral

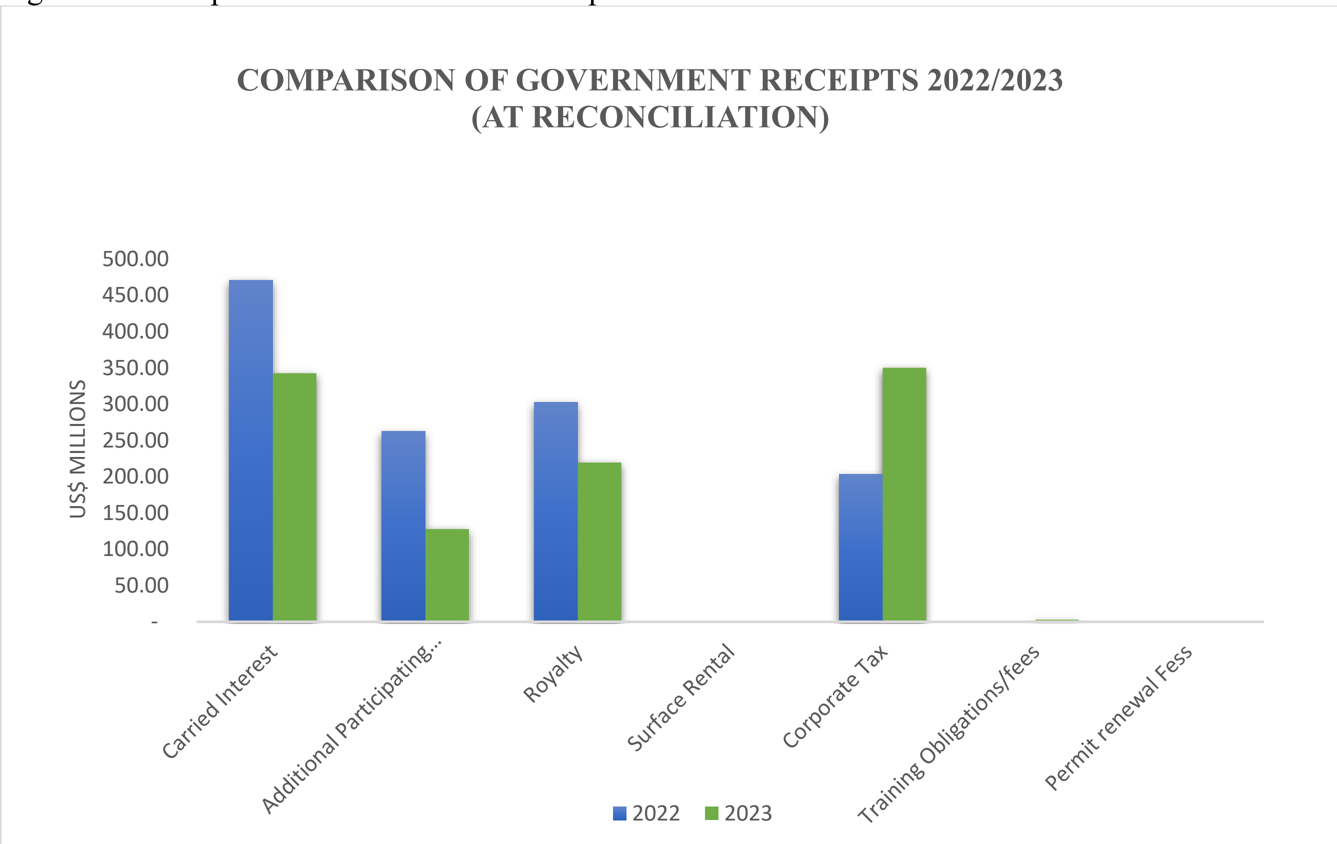
[40] *These companies paid royalty in kind in 2023.*

declaration by the GRA is considered, the coverage moves to over 99% from 98%. Thus, the absence of PetroSA declaration or the submission of a template reduced coverage by 1%.

4.1.23 Analysis of Reconciliation Results

Comparison of the 2022 and 2023 reconciliation outcomes are shown in Figure 4.2.

Figure 4.2: Comparison of Government Receipts 2022/2023



Source: GHEITI's construct (2025)

Table 4.19: Comparison of Revenue Streams 2022/2023

Revenue Stream	2023	2022	% Change
Carried Interest	342,701,641	470,887,602	-27.22
Additional Participating Interest	127,972,105	262,957,921	-51.33
Royalty	219,608,785	302,954,860	-27.51
Surface Rental	189,735	115,580	64.16
Corporate Tax	350,097,576	203,343,799	72.17
Training Obligations/fees	2,850,000	550,000	418.18
Permit renewal Fess	-	-	
Total	**1,043,419,842.19**	**1,240,809,761.78**	-15.91

Source: GHEITI's construct (2025)

From the diagram (Figure 4.3) it is seen that for the significant revenue streams, the values in 2022 were higher than those of 2023, except for CIT. Permit renewal fees recorded zero as the selected companies did not apply for permit renewals in 2023. As seen from table 4.19, corporate tax, surface rental and training obligations recorded higher values in 2023 than in 2022. However, the other values were lower relative to that of 2022.

Carried interest, participating interest and royalty (revenue streams linked directly to oil production) declined in 2023. The lower revenues in 2023 were mainly due to a decline in achieved average crude oil price in 2023 compared to 2022. The average price in 2023 was US$ 80.65 compared to US$ 98.72 in 2022.

The percentage contribution to government revenues also declined in 2023 for Carried Interest and Additional Participating Interest (CAPI). CAPI percentage contributions to Government revenues declined from 51.4 percent in 2022 to 44.3 percent in 2023.Royalty's percentage contribution to government revenues decreased from 21.2% in 2022 to 20.7% in 2023.Corporate Income Tax receipt increased by 72% in 2023, compared to 2022.

4.1.24 Government Revenue in 2023

During the reporting period, the total petroleum receipts paid into the PHF was US$1,062,323,419.12, representing a 5.32 percent increase over the revised projected petroleum revenue for the year 2023 and a decline of 25.65 percent from that of 2022 (US$1,428.76 million). This decline was occasioned by the two main determinants of total revenues; price and production. The price of Brent crude[41] oil averaged US$83 per barrel (b) in 2023, down from US$101/b in 2022, representing an 18 percent decline. On the production side, there was a decline from 51,756,481.12 bbls in 2022 to 48,247,036.61 bbls in 2023 representing a 7 percent decline in total production.

The petroleum receipts distributed for the year 2023 amounted to US$1,062,079,572.48.

4.2 Sale of the State's Share of Production or other Revenues Collected in-kind.

GNPC is charged with the responsibility of lifting and marketing the State's share of oil, made up of the state's share of CAPI and royalties. The lifting, sale and collection of revenues by the State is guided by the Petroleum Agreement, the Crude Oil Lifting Agreement (COLA) and the Crude Oil Sale and Purchase Agreement (COSPA) for each of the producing fields. These agreements detail the terms agreed by the parties, as well as the terms and processes of the lifting, sale and collection of revenues. The revenue generated from these sales is deposited into the PHF. GNPC employs both spot and term contracts. Spot sales or near-term forward transactions are one-time transactions on the open market, with prices determined at the time of the transaction and crude oil delivery typically occurring between 10 and 60 days after the contract is finalised. Term contracts, on the other hand, are longer-term contracts typically over a year. These contracts enable buyers and sellers to agree on a specified quantity of crude to be delivered over an extended period, usually more than a year.

Both Spot and Term contracts detail the quantity and quality of the crude, the lifting point, the pricing formula (usually tied to an international benchmark and a differential), the lifting schedule, and the payment terms, among other specifications. Royalty payments by International Oil and

[41] https://www.eia.gov/todayinenergy/detail.php?id=61142

Gas Companies are made in-kind with GNPC making liftings of royalty oil as part of the lifting schedules agreed between the parties at the commencement of the production year.

Details of the crude oil liftings for 2023 and revenue collected are systematically disclosed by GNPC via the link[42] . The disclosed data includes the seller, oil grade and quality (API disclosed cargo by cargo), date of sale (cargo by cargo bill of lading date), type of lifting (equity production and/or royalty), contract/invoice number, buyer, incoterms (mostly FoB), loading port/terminal/depot, volumes sold, benchmarked prices(Dated BRENT), Price differential, pricing option information and fees, achieved price, revenue received, contract type (spot or term), forex rate, payment receipt date, payment account (PHF), destination of crude, and source of data.

4.2.1 Methods for Buyer Selection

A competitive bidding process is utilised by GNPC to select buyers or offtakers of crude available for shipment. The process starts with the development of a Request for Proposal (RFP) for the selection of an offtaker. Once the RFP is approved, bids are invited from a list of pre-qualified buyers after which an evaluation team is constituted to review and select a buyer based on financial and technical capacity for Management and Board approval and contracting.

4.2.2 Pre-Qualification Process

The pre-qualification process for potential buyers ensures that only those with a sufficient level of financial and technical capability are considered. Typically, three primary criteria are used for selecting buyers:

- Technical Capability: This assesses the buyer's ability to handle the commodity and their experience in relevant markets.
- Financial Capability: This includes evaluating the buyer's strategy for obtaining the best differential, their creditworthiness, and the ratings of their LC banks.
- Local Participation Potential: This criterion is relevant for jurisdictions aiming to enhance local trading capabilities.

After passing the pre-qualification process, buyers are added to a list of eligible participants for future competitive bidding. GNPC conducts this evaluation prior to each tender or sale.

4.2.3 Pre-defined Criteria to Select Buyers

A buyer is evaluated against the established criteria during the pre-qualification stage.

4.2.4 Technical Capability

GNPC issues a request for proposal (RFP) to companies on its list of pre-qualified buyers, chosen based on an initial evaluation of the crude oil's grade and the buyers' experience. The assessment emphasizes the buyer’s capability to handle a cargo of crude oil and their commercial strategy. In selecting a marketer, GNPC considers the company's experience, adaptability in crude oil marketing, and its Health, Safety, and Environment (HSE) capabilities.

[42] https://www.gnpcghana.com/publications/crude-oil-sales-reports

4.2.5 Financial Capability

GNPC has an established financial criterion (subject to review) to assess the prospective buyer's payment capability. This involves requiring buyers to provide proof of a credit line from a reputable financial institution or demonstrate their ability to make direct payments for the crude oil they intend to purchase. Additionally, GNPC verifies the buyer's credit line and conducts an evaluation of their credit rating.

4.2.6 Local Content

The Corporation employs a buyer selection team that scores based on technical (75 percent) and commercial (25 percent) criteria. These scores are aggregated and averaged before a recommendation is forwarded to GNPC management for approval or rejection of the buyer. The evaluation process prioritizes the participation of local partners and compliance with local content requirements, in line with the Ghanaian government's policy to encourage local involvement in crude oil trading.

Table 4.20: GNPC Weighting Criteria for Selection of Crude Oil Buyer

TECHNICAL	75 (%)	Ability to lift and strategy	15 (%)	%
		o/w Shipping		3
		o/w Experience in trading crudes		4
		o/w Refineries/options		3
		o/w Sales/Marketing strategy		5
		Flexibility of marketing	10	
		o/w Ownership/access to dedicated vessels		2
		o/w Access to wider markets		5
		o/w Access/partnership with refineries		3
		Experience in marketing new crude oil	10	
		o/w Number of crude Oil marketed		6
		o/w Marketing West African Crude		4
		HSE (Proof of good Safety record)	5	
		Capacity Building (Provision for GNPC Staff training)	5	
		Local Content	30	
		o/w Evidence and terms of partnership		5
		o/w Strength of local partner		10
		o/w In-country presence and Investment		15
COMMERCIAL	25	Commercial terms	25	
		o/w Strategy to achieve the best price(differential) proposed		10
		o/w Marketing fee		5

TECHNICAL	75 (%)	Ability to lift and strategy	15 (%)	%
		o/w Pricing option		5
		o/w Bank credit line or Strong Company financial status		5
	100	TOTAL	100	

Source: GNPC[43]

4.2.7 Composition of the Team

Once the request for proposals has been sent out to potential buyers, GNPC management assembles an Evaluation Team made up of members from the legal, marketing, procurement, and finance departments. This team establishes the evaluation criteria and assesses the bids according to these criteria. The Evaluation Team then submits a report with their findings and recommendations to GNPC management. After the evaluation process is completed, the team is dissolved.

4.2.8 Reporting Structure and Team Oversight

The buyer selection team is chaired by the Chief Finance Officer, who reports directly to the CEO of GNPC. Although there is no alternative reporting line, the selection process and evaluation results are reviewed by the internal audit team.

4.2.9 Disclosure of Sales Contract Terms

The sales contract terms are partially disclosed to an unsuccessful bidder by GNPC upon request.

4.2.10 Marketer Selection

GNPC engages a marketer when selling a new grade of crude oil and where GNPC may not have sufficient knowledge of the international oil markets. When engaging a marketer, GNPC considers both technical and commercial criteria.

4.2.11 GNPC – Marketer Selection

Technical Evaluation Criteria:

- Lifting Capability and Strategy
- Marketing Flexibility
- Experience with New Crude Oil (if applicable)
- Health, Safety, and Environment (HSE) Compliance
- Capacity Building
- Local Content Requirements

4.2.12 Commercial Evaluation Criteria

- Strategy for Achieving the Best Differential or Proposed Price
- Marketing Fee (if applicable)

[43] https://www.gnpcghana.com/

- Pricing Options
- Bank Credit Line or Strong Financial Status of the Company

4.2.13 Pricing Policy or Formula for Setting Prices

GNPC employs a pricing formula when selecting buyers for crude oil cargoes as follows:

Unit Price (US$/Bbl) = Dated Brent Price + Differential + Pricing Option Fee + Marketing Fees (if applicable).

4.2.14 Lodgement of Payments made for the Sale of Crude Oil

In reference to section 6 of the PRMA, all receipts from the sale or export of crude oil are required to be deposited directly into the Petroleum Holding Fund, domiciled at the Bank of Ghana. The following are the legally mandated crude oil sale receipts deposited into the PHF by GNPC on behalf of the Government of Ghana per the PRMA.

- Revenues from royalties
- Revenues from the sale of the State share of production by GNPC in the form of carried and participating interest.

In practice, GNPC leads crude oil sales on behalf of the government and direct the deposit of sales receipts into the PHF. However, receipts from Explorco (a subsidiary of GNPC) interests in TEN and Jubilee (formerly held by Jubilee Oil Holdings Ltd) have never been deposited into the PHF since its acquisition in 2021. Consequently, receipts from crude oil sales exclude Explorco's, which in the opinion of the MSG constitutes a violation of the PRMA.

4.2.15 Pricing Adjustments for Long-Term Sale Agreements

The physical sale or delivery of crude oil and gas is commonly organized under spot contracts or term contracts. Term contracts allow buyers and sellers to negotiate for an agreed quantity of crude to be delivered within a specified period of time, usually for more than a year. The arrangements specify the quantity and quality of crude, point of lifting, the formula for determining the price which is typically linked to an international benchmark and a differential, lifting schedule, and payment terms among others.

GNPC has three term contracts with Unipec Asia and Litasco to lift from Jubilee and TEN accordingly. Based on the offtaker agreement between GNPC and Unipec Asia in December 2011, 13,000 bpd of crude oil, (equivalent to 5 cargoes per calendar year) for 15.5 years from the Jubilee field is available for purchase by Unipec. The contract terms mirror the terms of the loan facility agreement between the government of Ghana and the China Development Bank in 2011[44].

Based on the offtaker agreement between GNPC, Litasco and Unipec, prices of crude oil are determined in reference to the daily average of Dated Brent price plus a differential and a fee for exercising a pricing option. The agreement provides for the buyer to choose one out of four pricing options for the dated Brent component. The first three options use five quotations of Platts

44 https://www.brr.gov.gh/acc/registry/docs/2176-MINERALS%20AND%20MINING%20(LICENSING)%20REGULATIONS,%202012%20(L.I.%202176).pdf

Marketwire average mean of the dated Brent price while the last option uses monthly average of Platts Crude Oil Marketwire dated Brent price related to the Bill of Lading (BL) date. Any option exercised by buyers attracts a margin.

The options are:

- The average of 2 days prior to BL date; the BL date and the 2 days following the BL date,
- The average of 5 consecutive dates going back from immediately before the BL date,
- The average of 5 consecutive prices going forward from immediately following the BL date,
- The monthly average of Platts Crude Oil Marketwire dated Brent price quotations.

Although each sales agreement has a specific pricing formula, GNPC has confirmed that both spots and term contracts follow the same pricing arrangements.

Table 4.21: Summary of GNPC Crude Oil Sales and Purchase Agreements (COSPA)

Contract/ Counterparty	Counterparty Description	Basis of Agreement / Facility	Execution Date & Term	Annual Supply Obligation	Cargoes Supplied (Status)	Current Status / Key Conditions	Outstanding Financial Obligations
GNPC – UNIPEC UK	Subsidiary of Sinopec, a Chinese company	COSPA tied to China Development Bank (CDB) Loan Facility to MoF by the Government of China	Executed February 2012 for a 15.5-year term	5 Jubilee cargoes annually	13 years of contract completed as of February 2025	Contract expires in 2027	Outstanding CDB Loan balance of US$110.923 million (MoF)
GNPC – LITASCO SA	Trading arm of Lukoil	Based on Karpowership Bank Guarantees and a US$539 million Loan Facility Agreement	Executed August 2017; original term of 6 years (to expire in 2023), later amended	Originally 4 TEN cargoes annually; amended in December 2024 to 2 TEN/Jubilee/Sankofa cargoes annually	Ongoing under amended terms	Termination subject to full discharge of obligations under Explorco–Litasco Facility Agreement	Approximately US$8 million outstanding under GNPC–Litasco Facility Agreement
GNPC – GEMCORP SA	International trading company based in the UK	COSPA linked to a US$152 million Pre-Export Facility (PXF)	Executed July 2019	5 Sankofa cargoes over the contract term; at least 1 cargo annually	4 cargoes supplied as of 31 January 2025	One Sankofa cargo outstanding as of 31 January 2025	No outstanding financial balance reported

Source: GNPC

Note:

Term of the Agreement and Termination Clauses

Clause 2.0 of the GNPC-UNIPEC Crude Oil Sale and Purchase Agreement (COSPA) executed in February 2012 states the following:

"Subject to the Master Facility Agreement, the term of this Agreement shall be 15½ Years from the Effective Date except that this Agreement shall automatically terminate if:

(a) at any time prior to the expiration of the Master Facility Agreement (MFA), all amounts outstanding under the Master Facility Agreement are irrevocably repaid in full and any outstanding commitments to provide financial accommodation are cancelled; or

(b) at any time during the term of the Master Facility Agreement, amounts outstanding under the Facility are irrevocably repaid in full and any outstanding commitments to provide financial accommodation thereunder are cancelled; or

(c) Seller has discharged in full its obligation in respect of the agreed volumes to be delivered under this Agreement."

Termination Clause 16

This Clause indicates that a Party shall only have the right to terminate this Agreement in the following circumstances ("Termination Event"):

(a) if the other Party is subject to Insolvency or Other Similar Circumstances; or

(b) in the event of extended and continuous or persistent periods of Force Majeure affecting the other Party, despite all reasonable counter measures taken by the Parties, and as a result of such Force Majeure the other Party has been unable to receive or deliver as the case may be a substantial part of the deliveries anticipated by the relevant Part of this Agreement for a period of any six (6) consecutive months.

(c) Events falling under Clause 2 indicated above.

The only rights of the Parties to terminate this Agreement are as set out in this Clause 16 (Termination) of the COSPA.

4.3 Infrastructure Provisions and Barter Arrangements

Infrastructure and Barter transactions involve the exchange of goods and services (such as loans, grants, and infrastructure projects) either fully or partially for oil, gas, or mining exploration and production concessions, or the physical delivery of these commodities. Aside from the UNIPEC agreement, no other barter arrangements have been observed in the sector. However, GHEITI noted the SGN financing arrangement, where, if cash calls are not met, the operator has the right to prefinance and recover the costs from the country's share of oil and gas production. Although crude oil and gas are used for cash call payments in this case, the MSG does not view this as a direct barter arrangement. Such practices are typical in free-carried interest arrangements within the industry.

4.4 Transportation Revenues

Transport revenues accrue from transportation services in respect of lean gas by Ghana Gas Limited Company. In 2023, an amount of US$74,219,268.75 was invoiced for transportation services by Ghana Gas, with US$49,348,304.88 actually paid and US$24,870,963.87 outstanding.

Table 4.22 captures detailed information on gas produced and sold, including type of product, quantities sold, units of measurement (MMBtu), and values in USD.

Table 4.22: Gas Sale and Trade Volumes

Oil and Gas Production Data Description	Type of Product	Quantity Sold	Unit of measure	Value/Paid US$
	LEAN GAS			
	VRA	21,049,068.50	MMBtu	145,249,181.19
	Sentuo	1,363,791.14	MMBtu	1,738,261.84
	Wangkang	3,185,874.21	MMBtu	16,381,566.88
	Twyford	5,834,709.00	MMBtu	28,381,673.72
	Marco Polo	61,959.31	MMBtu	295,118.18
	Jintao	28,473.75	MMBtu	142,922.79
	Sentuo Oil Refinery	190,082.42	MMBtu	1,464,027.09
	Genser	7,418,609.72	MMBtu	9,974,731.28
	GNPC Transmission	78,140,081.88	MMBtu	74,219,268.75
	GNPC Lean Gas	1,548,941.56	MMBtu	6,438,836.06

Source: GNGLC (2025)

Table 4.23: Gas Sales Per Producing Field (US$)

Field	Sales
TEN	210,066,319.03
Jubilee	
Sankofa	74,219,268.75

Source: GNGLC (2025)

For the 2023 reporting period, the Weighted Average Cost of Gas (WACoG) tariff was applied to gas volumes sold to VRA**,** with monthly rates varying over the year in line with approved tariff schedules.

The Transmission tariff was applied to Gas volumes transported on behalf of GNPC**,** covering transmission services. These tariffs reflect regulated charges applicable to the respective services and were applied consistently to the relevant gas volumes during the period.

Table 4.24: represents the monthly tariff structure for 2023**,** showing the applicable WACoG tariff and the corresponding Transmission tariff for each month. It provides a clear comparison of tariff variations over the year, highlighting changes in pricing applied to gas volumes sold to VRA under the WACoG and gas volumes transported on behalf of GNPC under the transmission arrangement.

Table 4.24: 2023 Weighted Average Cost of Gas and Transmission Tariff

Month	WACoG Tariff (US$)	Transmission Tariff (US$)
January	5.9060	0.9271
February	6.0952	1.0049
March	6.0952	1.0049
April	6.0952	1.0049
May	6.0952	1.0049
June	6.5165	0.9190
July	6.5165	0.9190
August	6.5165	0.9190
September	8.1221	0.9190
October	8.1221	0.9190
November	8.1221	0.9190
December	7.6426	0.9190

Source: GNGLC

Cash Waterfall Mechanism — Purpose & how it works

Purpose. The Cash Waterfall Mechanism (CWM) is a rule-based allocation system that directs regulated electricity revenue (primarily from ECG collections) into a predefined sequence of payments to the energy value-chain stakeholders to improve transparency, ensure priority obligations are met and reduce ad-hoc allocation. It was adopted as part of Ghana's energy-sector recovery measures and implemented in phases starting 2020 with subsequent revisions.

Basic mechanics.

1. **Collection:** ECG (and other regulated receipts) are lodged into a designated account.
2. **Prioritisation (waterfall tiers):** Cash is released in a fixed order — typically covering

(a) Statutory and Regulatory Levies/Taxes,
(B) Critical Operational Costs and Debt-Service Obligations,
(C) Payments to Generation/Fuel Suppliers (VRA, IPPS, GNPC/Ghana Gas),
(D) Transmission (Gridco) and Other Beneficiaries. Exact Tiers And Amounts Are Defined In The Approved Cwm Rules And Validated Monthly By Purc.

Natural Gas Clearing House (NGCH / Natural Gas Clearinghouse) — role & modality

Purpose and coverage. The NGCH is the sector mechanism used to manage and net inter-company gas obligations across state energy companies (notably GNPC, Ghana Gas/GNGC and VRA) and to coordinate payment to upstream gas suppliers (e.g., Sankofa partners). It complements the CWM by handling gas-specific receipts, legacy cross-debts and credit notes arising from gas purchases/sales.

How it operates (typical steps).

1. **Aggregation:** Gas-related billings (GNPC purchases, GNGC transportation charges, VRA gas offtake invoices) are aggregated into the clearinghouse.
2. **Reconciliation:** Parties submit invoices, supporting documentation and reconciliations to the clearinghouse secretariat. The clearinghouse validates volumes/prices and identifies net positions.
3. **Netting & credit-notes:** Where cross-claims exist (e.g., VRA owes GNPC for gas; but GNPC owes Ghana Gas or vice-versa, or historical legacy balances exist) the clearinghouse instructs the issuance of credit notes and performs netting to reduce gross intercompany payables/receivables. These credit notes are instruments for cross-offsetting obligations rather than immediate cash settlement.
4. **Settlement:** After netting, the remaining net cash obligations are settled either (a) via the CWM cash distributions where cash exists, or (b) by bilateral settlement plans if CWM cash is insufficient.

Cash Payments & Credit-Notes Treatment Between GNPC, Ghana Gas (GNGLC) & VRA (Practical Accounting/Operational view)

Below are the typical operational and accounting treatments used in the sector (based on published validation reports, MOF/PIAC/IMF references and standard reconciliation practice):

1. Cash payments (when cash is available via CWM)

- **Direct payment route**: When the waterfall releases cash to fuel suppliers, payments are made to the beneficiary's bank account (GNPC, Ghana Gas/GNGC, VRA) and recorded as cash receipts (debit bank / credit revenue or settlement of receivable depending on the supplier's ledger).
- **How GNGC/VRA record receipts:** Entities record the cash received as settlement of their outstanding invoices/receivables. If the amount is less than the invoice (partial payment), the receiving SOE keeps the remaining as receivable (or uses the clearing house to perform netting).

2. Credit notes & netting via NGCH

- **What a credit note represents:** In this context a credit note is typically an NGCH instrument that reduces a counterparty's payable by an agreed amount (e.g., GNGC issues or receives a credit note to reflect over-payments, reconciliation adjustments, or netting of inter-SOE balances).
- **Accounting treatment (practical):** The issuer of a credit note recognizes it as a reduction of a receivable or a liability depending on the situation (for example, GNGC reduces its invoice receivable from VRA if it issues a credit note to VRA). The recipient records the credit note as reduction of the payable to the issuer. Where credit notes net legacy debts across multiple SOEs, each entity records the net position (net receivable or net payable) after the clearinghouse adjustment. This avoids double counting and mirrors how IMF analyses the net change in payables for the sector.

4.5 Transactions Related to State Owned Enterprises

4.5.1 GNPC

This section addresses GNPC's role as a state-owned enterprise (SOE), including disclosures of significant payments made to GNPC by companies, transfers from GNPC to the government, and transfers from the government to GNPC.

GNPC's total guarantees and payment receivables amounted to US$1,231,077,317.87 as at December 2023. These include loan amounts due from government and its related agencies, payments outstanding from gas sales and guarantees on behalf of the State and its agencies, some which date as far back as 2010. Table 4.25 provides details of amount due from Government and its agencies.

Table 4.25: Amounts Due from Government and its Agencies to GNPC

Government Agency	2023 (US$)
Government of Ghana	23,217,406
Ministry of Finance	11,927,545
Tema Oil Refinery	58,404,875
Ghana National Gas Company	74,540,706
Ministry of Energy Current Account	238,656
GEMCORP/BOST Loan	90,713,947
Volta River Authority	76,407,993
Total	335,451,128
Less Impairments	(223,078,321)[45]
	112,372,807

Source: GNPC 2023 Annual Report

Table 4.26: GNPC Investments in its Subsidiaries

	Investments as at 2022	2023 Investments(US$)
Mole Motel Co. Ltd	9,570	9,570
Prestea Sankofa Gold Ltd	795,905	20,876,009
GNPC Exploration and Production Co. Ltd	13,150	13,150
Jubilee Oil Holding Company Limited	164,798,691	50,000

Source: GNPC, 2023

Table 4.27: GNPC Investments in Its Joint Venture and Associate Companies

	Investments as at 2022 (US$)	2023 Investments
Saltpond Offshore Producing Company	620,156	620,156
Gulf Frontiers Logistics Ltd	98,265	98,265
GNPC Technip Engineering Services Ltd	988,231	131,563
Less Impairments		849,984[46]

45 The $223,078,321 is the total impairment for all the seven (7) entities shown in the table

46 $849,984 is the total impairment attributed to the three listed companies shown in the table.

Source: GNPC 2023 Annual Report

Table 4.28: Amounts Due GNPC from Its Related Parties

Related Party	Amounts Due as at 2022 (US$)	2023 Amounts Due
Saltpond Offshore Producing Co. Ltd	7,083,354	7,088,003
Prestea Sankofa	24,263,871	3,528,722
Mole Motel Limited	221,662	223,032
Saltpond Offshore Producing Company	7,083,354	7,088,003
GNPC Technip Engineering Services Ltd	37,184	31,206
GNPC Exploration and Production Co. Ltd	15,559,846	16,322,317
Less Impairments		10,647,931[47]

Source: GNPC 2023 Annual Report

Table 4.29: Medium Term Loan Transactions

	Amounts outstanding as at 2022(US$)	2023 amounts outstanding	Remark
Ministry of Finance-Jubilee Oil Holding Limited – loan	40,704,511[48]	-	
Term Loans	90,713,947	90,713,947	
GoG Advance for OCTP Gas	489,048,221	86,102,820	
Bank Loan	23,519,779	21,680,725	The interest rate is 5.5percent over the 3-month LIBOR rate at the first drawdown date.

Source: GNPC 2023 Annual Report

Loan terms and Conditions

Ministry of Finance - Jubilee Oil Holding Limited Loan: The Ministry of Finance provided a bridge loan of US$164,798,691 for GNPC to acquire 7% of Anadarko WCTP Company shares in the Deep Water Tano (DWT) and West Cape Three Point (WCTP) blocks. As at 2023, the loan has been fully paid.

Term Loan - LITASCO: GNPC, under the direction of the Ministry of Finance, secured a US$200 million loan from LITASCO to refinance ECG's HFO debt at a rate of 3-month LIBOR plus 5.5 percent, payable over three and a half years.

Government of Ghana Advance for OCTP Gas: In May 2019, the Cabinet approved the Energy Sector Recovery Program (ESRP) to address financial shortfalls in the Energy Sector, aiming for financial balance by 2023. Key initiatives included the Cash Waterfall Mechanism (CWM) and the Natural Gas Clearing House (NGCH). The CWM ensures equal distribution of revenues collected by ECG, while the NGCH, introduced in October 2020, captures both tariff and non-tariff revenues for equitable allocation. Outstanding balances represent payments used to settle gas supply debts to the Corporation, awaiting offset against debts owed by Independent Power Producers (IPPs), as advised by ECG.

[47] $ 10,647,931 is the total impairment amount attributed to the six companies listed in the table.

[48] amount remaining out of a total of 164,798,691 advanced by the Ministry of Finance in 2021

Bank Loan: GNPC secured a US$25 million loan from Societe Generale Ghana to finance its operational Head Office in Takoradi and Research Centre in Accra. The loan has a 24-month term with a moratorium period after the first drawdown, converting to a term loan payable over three years. The interest rate is 5.5 percent over the 3-month LIBOR rate at the first drawdown date. A 2 percent interest applies on default, and any unpaid amount after the term attracts a 13.9 percent annual penalty rate.

Table 4.30: GNPC Related Party Transactions

	2022 (US$)	**2023** (US$)
GNPC Exploration and Production Co. Ltd	3,861,487	
Prestea Sankofa Gold Ltd	3,648,367	
Saltpond Offshore Producing Co. Ltd	578,097	
Mole Motel	-	
GNPC Technip	**-**	

Source: GNPC (2023)

4.5.2 Jubilee Oil Holding Limited (JOHL)

The JOHL, a subsidiary of GNPC made two (2) liftings during the year under review yielding a total of US$143,315,459.42 as compared to two (2) parcels in 2022 yielding US$185,567,320.93. Proceeds from the second lifting which occurred in December 2023 were received in January 2024. Following directives by Parliament and the Ministry of Energy, JOHL's 7 percent interest were reassigned to Explorco during the period. JOHL therefore ceases to exist as a subsidiary of GNPC.

4.6 Sub-national Payments

There were no material subnational payments in 2023. ENI paid an amount of GHS1,026,206.16 as property rate and 94,500 cedis (US$8,575) as Business Operating Permit to the Ellembele District Assembly.

Ghana Gas paid Business Operating Permit amounting to GHS 165,895.55; GHS125,000 and GHS40,000 were paid to Nzema East Municipal Assembly and Ahanta West District Assembly respectively. The payment details can be found in Table 4.31.

Table 4.31: Subnational Payments by Oil & Gas Companies

Company	Business Operating Permit (GHS)	Property Rate (GHS)
Eni	94,500	1,026,206
Ghana Gas Company	165,896	0
Total	**260,396**	**1,026,206**

Source: GHEITI's construct (2025)

4.7 Level of Disaggregation

By EITI definition, a project is defined as operational activities that are governed by a single contract, license, lease, concession or similar legal agreement, and form the basis for payment liabilities with a government.

Nonetheless, if multiple such agreements are substantially interconnected, instances which are considered a single project must be identified.

In Ghana, an oil and gas project is defined as operational activities that are governed by a single contract, agreement, concession, license, lease, permit, title or unitized production area agreement which form the basis for payment liabilities with the government.

Legal instruments that define project

1. Petroleum (Exploration and Production) Act, 2016 (Act 919)[49]
2. Petroleum Revenue Management Act, 2011 (Act 815) and as amended by Petroleum Revenue Management (Amendment) Act, 2015 (Act 893)[50]
3. Income Tax Act, 2015 (Act 896) as amended[51]

The Jubilee Field straddles the West Cape Three Points and Deepwater Tano licences and a unitisation and unit operating Agreement was approved and made operational between GNPC, Tullow Ghana Ltd, Kosmos Energy Ghana Ltd, Anardarko[52] WCTP Company and others.

The following revenue streams were reconciled in this report.

1. Royalty
2. Carried Interest
3. Additional Paid Interest
4. Surface Rentals
5. Permit renewal fees
6. Training Obligations

A) Royalty, Carried Interest, Additional Participating Interest, Training Obligations and surface rentals are imposed/levied on project basis. They were reported on project basis, with the exception of surface rental and training obligations. Surface rental and training obligations although imposed on project basis, the information by reporting entities did not provide disaggregated data. They were therefore reported on entity level. (Surface rental

[49] Petroleum (Exploration and Production) Act, 2016 Act 919 provides for the co-ordination and unitization of petroleum activities where an accumulation of petroleum extends beyond the boundaries of one contract area into one or more other contract areas, be combined as a single unit[49].

[50] Section 85 of Act, 2016 Act 919 requires the contractor to pay to the Republic royalty in respect of gross volume of petroleum produced and saved.
Section 86 of Act 919 requires a contractor to pay the Republic annual acreage fees as surface rentals
Section 87 of Act 919 states that a licensee, contractor, sub-contractor and the Corporation shall pay taxes, including petroleum income tax and capital gains tax in accordance with applicable enactments.
Section 88 of Act 919 stipulates the payment of bonuses to the Republic as may be prescribed, except that where the type and quantum of the bonus payable is not prescribed, the bonus shall be paid as otherwise provided in accordance with the terms of a petroleum agreement in respect of the area to which the agreement relates.
Section 89 of Act 919 states that the Republic is entitled to a portion of a contractor's share of petroleum produced from each field on the basis of the after-tax inflation-adjusted rate of return that the contractor achieved with respect to each field as Additional Oil entitlement.

[51] Section 64 of Act 896 a petroleum operation pertaining to a petroleum right shall constitute a separate petroleum operation
[52] In 2023 Anadarko was no longer operating in Ghana.

did not meet the materiality threshold, and was added for reconciliation by the MSG on the basis of tracking payment /legacy issues) (see Appendix 5)

B) Corporate Income Tax and permit renewal fees are not levied on project basis and were not reported on project but entity level. (see Appendix 5)
Requirement 4.7(a) states that 'where a payment covered by the scope of EITI disclosures is levied at entity level rather than at project level, the company is encouraged to disclose the payment at the entity level'

Thus corporate tax and permit renewal fees which are levied at entity level, were disclosed at the entity level.

4.8 Data Timeliness

The period of reporting for this assignment is from 1st January to 31st December 2023. The data used for the compilation of the report is within the two-year permissible time lag stipulated by the EITI Standard. Data updates are provided up to the current year (2025), where available but reconciliation is limited to the reporting period, 2023.

4.9 Data Quality and Assurance

The GHEITI MSG affirms that this report has been produced based on data that has been audited in line with the International Financial Reporting Standards (IFRS). Further assurance of data credibility is provided through the following measures:

- In the case of companies, data requisition templates are required to be signed off by a Senior Manager, preferably, the Chief Executive Officer, the Managing Director or the Chief Financial Officer; and
- For government agencies and SOEs, the completed reporting templates must be signed by a senior manager. (see Appendix 6)

In either case, submission of supporting documents for amounts stated on the templates by companies and government agencies were demanded. (see section **4.1.2.14)**

4.10 Project costs

Monitoring of Project Costs including capital expenditures, operating expenditure, and amortization (depreciation/impairment) in the Upstream Petroleum sector is primarily governed by the **Income Tax Act, 2015 (Act 896)** and its associated regulations, especially the **Transfer Pricing Regulations, 2020 (L.I. 2412)**.

Income Tax Act, 2015 (Act 896

1. **Sections 8, 9, and 12** of the **Income Tax Act, 2015 (Act 896), as amended** along with related Practice Notes, set out the general principles for allowable deductions, requiring expenses to be "wholly, exclusively and necessarily incurred" in the production of income. This provides the legal basis for the Ghana Revenue Authority (GRA) to scrutinise project costs.
2. **Section 14 of the Income Tax Act, 2015 (Act 896) and Capital Allowance Rules:** Companies are granted deductions for capital allowance (depreciation) on

depreciable fixed assets at a specific rate (typically 20% each year). The rules require that any unutilised capital allowance in a year is written off and cannot be deferred.

Third Schedule of the Act Specifies the calculation methods and rates for capital allowances. For petroleum operations, allowances are typically granted at a rate of 20% on a straight-line basis from the year of commercial production on petroleum capital expenditure.

3. **Section 16 Income Tax Act, 2015 (Act 896)** Limitation on financial costs provides for limitations on the deduction of financial costs (interest expenses, etc.) in calculating chargeable income.
4. **Deductible:** Expenses wholly, exclusively, and necessarily incurred in petroleum operations are generally allowed for tax purposes (e.g., capital allowances, bad debts, specific training costs for Ghanaians).
5. **Non-Deductible:** Expenses of a capital nature (which secure a benefit for more than 12 months), personal expenses, and income/profit taxes are generally disallowed.
6. **Amortisation (Intangible Assets):** The law allows for capital allowance deductions for intangible assets (e.g., patents) over their useful life, as specified in the Third Schedule.
7. **Section 17 of Income Tax Act, 2015 (Act 896 (Loss Carried Forward)** provides that unrelieved losses can be carried forward and deducted against future income for a maximum of five years.

Transfer Pricing Regulations, 2020 (L.I. 2412)

This legislative instrument details the rules for related-party transactions and applies to entities in the oil and gas sector.

1. **Regulation 2: Arm's Length Standard.** This regulation establishes the requirement that all transactions between associated persons must be conducted at arm's length (as if they were independent parties). This is crucial in the oil and gas sector where intra-group transactions (e.g., equipment transfer, technical services, financing) are perceived to be common.
2. **Regulation 3: Comparability** This outlines the factors to consider when determining comparability between controlled and uncontrolled transactions, which is fundamental to applying the arm's length principle.
3. **Regulation 4 & 5: Transfer Pricing Methods** list the approved methods (Comparable Uncontrolled Price (CUP) method, Resale Price, Cost Plus, Transactional Profit Split, Transactional Net Margin (TNMM) and provide guidance on choosing the most appropriate method for a given transaction.
4. **Regulations 6-9: Specific Arrangements** provide specific guidance for transactions relevant to the oil and gas industry, such as services (Regulation. 6), intangible property (Regulation. 7), cost contribution arrangements (Regulation. 8), and financing arrangements (Regulation. 9).
5. **Regulations 11 & 12: Documentation** mandate that companies maintain detailed, contemporaneous transfer pricing documentation (Master File and Local File) and file electronic copies with the Ghana Revenue Authority (GRA).

Thin Capitalisation

This ensures that companies do not take on excessive debt which will reduce the profit base as a result of large interest payments.

The relevant law for thin capitalisation in the oil and gas sector, is primarily found in **Section 33 of the Income Tax Act, 2015 (Act 896)**, as amended.

1. **Section 10 of Income Tax Act, 2015 (Act 896 (Interest Deductions):** Outlines the general rules for when interest incurred on a debt obligation is deductible (i.e., when the borrowed money or the asset acquired with it is used in the production of income).
2. **Section 33 of Income Tax Act, 2015 (Act 896 (Thin Capitalisation Rule):** This provision disallows deductions for interest expenses and foreign currency exchange losses on related-party debt if an entity is deemed "thinly capitalised".
3. **Debt-to-Equity Ratio:** An entity controlled by an exempt person (e.g., a non-resident entity or a tax-exempt domestic entity) is considered thinly capitalised if its debt-to-equity ratio exceeds **3:1** at any time during a basis period.
4. **Disallowed Amount:** The deduction is disallowed for the portion of interest or loss that relates to the debt exceeding the 3:1 ratio.
5. **Section 63 Income Tax Act, 2015 (Act 896 (Taxation of Petroleum Operations):** This section specifies that income from each separate petroleum operation is treated as an independent business for tax purposes, and tax liability is calculated separately for each. The thin capitalisation rules are applied within this separate operation framework.

In 2023, the **Income Tax (Amendment) (No. 2) Act, 2023 (Act 1111)** was passed, but its amendments primarily focused on revising individual income tax rates, and did not alter the core thin capitalisation rules. The 3:1 debt-to-equity ratio remains the established benchmark.

Ring-Fencing

The primary ring-fencing provisions are found in the **Income Tax Act, 2015 (Act 896)** and the **Petroleum (Exploration and Production) Act, 2016 (Act 919)**, with specific guidance provided by a Ghana Revenue Authority (GRA) practice note.

1. **Sections 77 and 78 of Income Tax Act, 2015 (Act 896)** provide for the segregation of petroleum operations into "Separate Petroleum Operations" for tax purposes.

The Act dictates that each **petroleum right** (the right to conduct operations under a petroleum agreement) is treated as an independent activity, and expenses from one cannot be deducted against revenue from another right.

Petroleum (Exploration and Production) Act, 2016 (Act 919) regulates petroleum activities and provides the framework within which petroleum agreements are established and executed.

Section 10 of Act 919 onwards detail the requirements for entering into petroleum agreements, which inherently establish the contractual basis for ring-fenced operations as the fiscal terms are often tied to specific contract areas.

The framework created by **Petroleum (Exploration and Production) Act, 2016 (Act 919** combined with the Income Tax Act, ensures that fiscal liabilities are determined with reference to specific contracts/projects, creating a ring-fencing outcome.

The Ghana Revenue Authority (GRA) has issued a practice note to clarify the application of the ring-fencing provisions under the Income Tax Act, 2015, ensuring consistency in the treatment of "Separate Petroleum Operations".
This note provides guidance on how income and deductions must be applied strictly within the boundaries of each separate petroleum operation.

MONITORING OF 2023 PROJECT COSTS

In 2023, GNPC monitored project costs in exploration, development, and production through its role as a joint venture partner, while PC served as the primary regulator for overall industry activities, including financial compliance.

The GNPC's monitoring activities stem primarily from its commercial and participatory function as Ghana's National Oil Company (NOC).

1. GNPC is a mandatory partner in all petroleum agreements with International Oil Companies (IOCs). In this capacity, it works alongside its partners on a **Joint Management Committee (JMC)** which reviews and approves proposed work programs and budgets, providing a direct mechanism for cost oversight.
2. For development and production operations, GNPC holds a "Participating Interest," contributing a proportionate share of the costs incurred. This direct financial stake mandates GNPC to ensure costs are efficient and justifiable, in line with international best oilfield practices, to optimize its own profitability and cash flow.

The following section outlines the data and information on 2023 operations of GNPC

GNPC Exploration Cost

GNPC Exploration cost for 2022 and 2023 as shown in Table 4.32

Table 4.32: GNPC Exploration Cost

PETROLEUM EXPLORATION PROJECT COST		
Cost Element	2022	2023
Ultra- Deep -Water Keta Project	835,219	1,290,215
North & South Project	1,789,754	2,764,746
TEN Project	4,123,064	6,369,156
OCTP-ENI Project	1,193,170	1,843,164
Deepwater Tano/Cape Three Point	2,150,357	3,321,791
Jubilee Investment	13,204,409	20,397,682
South Deep-Water Project	1,392,031	2,150,358
Voltarian Basin Project	1,826,874	2,822,089

Source: GNPC 2023

Saltpond Field Decommissioning Project

US$39.45 million was spent on the Saltpond Field Decommissioning Project in 2023

GNPC Cost of Production

GNPC Cost of Production in 2022 and 2023 are shown in Table 4.33

Table 4.33: GNPC Cost of Production

Cost Element	2022	2023
GNPC COST OF PRODUCTION		
Jubilee Production Cost	32,257,809	39,242,506
TEN Production Cost	1,555,918	9,378,396
SGN Production Cost	40,051,844	41,141,590
Jubilee Cost Amortisation	9,103,856	10,322,320
SGN Cost Amortisation	19,503,719	17,165,340
JOHL Cost	43,982,095	49,138,950
SGN FPSO Amotisation	4,012,029	3,287,216
TEN FPSO Amortisation	6,694,643	7,313,289
TEN Capital Cost Amortisation	28,130,923	27,143,106

Source: GNPC 2023

Amortization of Project cost

GNPC's producing fields namely Jubilee, TEN and SGN are amortised based on the units of production from each field. Amortisation is in proportion to GNPC's stake in these fields

Table 4.34: Amortization of Project cost

COST	2022	2023
Jubilee Cash Call Addition	19,192,113	18,536,866
TEN Cash Call Addition	18,936,667	8,371,347
SGN Cash Call Addition	449,147	255,690
AMORTISATION		
Jubilee	9,103,856	10,322,320
Right of Use – FPSO	6,694,643	7,313,289
Right of Use – FPSO OCTP	4,012,029	3,287,216
TEN	28,130,923	27,348,448
Sankofa Gye Nyame (SGN)	19,503,719	17,165,340

Source: GNPC 2023

Table 4.35 ENI GHANA Company's Financials

	USD
Revenue	777,459,334
Accumulatted capital expenditure to data	3,161,884.021
Operating Cost	165,865,665
General and Adminstrative Expenses	373,090,215
Operating Profit	238,503,454

	USD
Corporate income tax	
Profit after Tax	238,503,454
Deferred Tax	85,043,731
Net profit	153,459,723
Cash Call	193,192,021
Recovered capiatal allowance	3,153,305,924
Dividends paid to shareholders	

Source: ENI

Table 4.36: Tullow Oil Ghana Company's Financials

	USD
Revenue	
Accumulatted capital expenditure to data	8,937,565,000
Operating Cost	(580,414,000)
General and Adminstrative Expenses	(10,581,000)
Operating Profit	342,631,000
Corporate income tax	118,377,000
Profit after Tax	225,254,000
Deferred Tax	
Net profit	225,254,000
Cash Call	546,857,732
Recovered capiatal allowance	
Dividends paid to shareholders	

Source: Tullow Oil Ghana

SECTION FIVE: REVENUE MANAGEMENT AND DISTRIBUTION

This section covers disclosures of information related to revenue allocations, enabling stakeholders to understand how revenues are recorded in the national and, where applicable, subnational budgets, and to track social expenditures by companies. The EITI Requirements related to revenue management and distribution include: (5.1) distribution of revenues; (5.2) subnational transfers; and (5.3) additional information on revenue management and expenditures.

5.1 Distribution of Extractive Industry Revenues

Types of Petroleum Revenues:

Sections 6(a-e) and 7(1) of the PRMA stipulate the various revenue streams in the oil and gas industry to be paid to government. These revenues constitute the gross receipts into the Petroleum Holding Fund (PHF) and are also recorded in the national budget.

These revenues include:

- Royalties, additional oil entitlements, surface rentals, other receipts from any petroleum operations and the sale or export of petroleum;
- Any amount from direct or indirect participation of government in petroleum operations;
- Corporate Income Taxes in cash from upstream and midstream petroleum companies;
- Any amount payable by the National Oil Company as corporate income tax, royalty, dividends, or any other amount due in accordance with the laws of Ghana;
- Any amount received by government directly or indirectly from petroleum resources not covered by paragraphs (a) to (d) and where applicable, capital gains tax derived from the sale of ownership of exploration, development and production rights.
- Revenue due from the direct or indirect participation of the Republic in petroleum operations, including the Carried and Additional Participating Interests shall be paid into the Petroleum Holding Fund

Sections 85-89 of the Petroleum (Exploration and Production) Act 2016 (Act 919) provide for payment of royalties, acreage fees (surface rentals), taxes, bonuses and additional oil entitlements by extractive companies to the state.

Allocation of Petroleum revenues

The PRMA established at the Bank of Ghana the following public funds for the allocation, utilisation and management of all petroleum revenues.
These public funds are the:

1) Petroleum Holding Fund (PHF) into which shall be deposited petroleum revenue for subsequent transfers into other funds;
2) Ghana Petroleum funds which is made up of the Ghana Stabilisation Fund (GSF) and the Ghana Heritage Fund (GHF). These funds receive allocations from the PHF for savings and investments. The GSF is designed to cushion the impact on or sustain government expenditure during periods of unanticipated petroleum revenue shortfalls, while the GHF is to provide endowment for inter-generational equity when petroleum reserves have been depleted.

3) Ghana Petroleum Wealth Fund (GPWF) which will serve as a consolidated fund of both the GSF and GHF within a year after petroleum reserves are depleted and the two funds cease.

All petroleum revenues are payable initially into the Petroleum Holding Funds (PHF) according to section 2(2) and section 3(2) of the PRMA from where distribution is done.

An amount not exceeding fifty-five percent (55percent) of the revenue from the initial carried and participating interest (CAPI) is given to the Ghana National Petroleum Corporation GNPC to finance equity cost of the State such as cash calls and other financing of the CAPI. The percentage of allocation to GNPC is subject to review and approval by Parliament. For nearly a decade, 30 per cent of net CAPI was often approved by Parliament. In the 2025 budget however, the Minister proposed 15 per cent which was approved by Parliament.

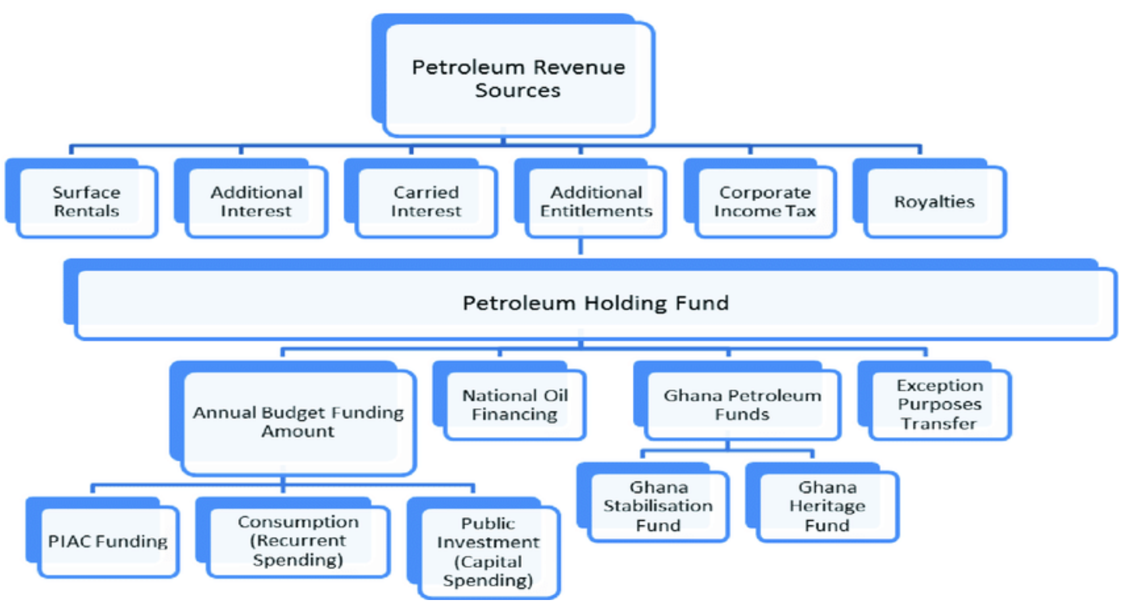
According to section 16 of the PRMA, allocations from the PHF net of GNPC's allocation must be to the following specified funds:

Firstly, to the Annual Budget Funding Amount (ABFA) which is allocated to the Consolidated Fund to support the national budget.

Secondly, to the Ghana Petroleum Funds (GSF and GHF) and

Thirdly, for exceptional purposes as defined in section 24 of the PRMA. Exceptional purpose payments may include tax refunds, management fees, compensation to local affected communities and royalties from onshore operations.

Figure 5.1: A flow of Petroleum Revenue disbursement according to the PRMA.



Source: Ministry of Finance

According to the PRMA, not more than 70 percent of the State's net petroleum receipts shall be designated as ABFA and not less than 30 percent shall be designated as Ghana Petroleum Funds (GPFs). Parliament is required to determine a percentage of petroleum revenue from the PHF which must be allocated to the GSF and the GHF.

The government is required to allocate at least 70 percent of ABFA funds for public investment expenditures consistent with Ghana's long-term national development plan[53] or generally for development purposes. To achieve this objective, and in accordance with the PRMA as amended by Act 893, an allocation not exceeding 25 percent of the ABFA must go to the Ghana Infrastructure Investment Fund (GIIF)[54]. The remaining 75 percent or more is to be allocated to the Priority Areas[55] as defined in the PRMA.

Another five percent of the ABFA is required to be transferred to the District Assembly Common Fund (DACF) in accordance with the Supreme Court decision in Benjamin Komla Kpodo and Another v. Attorney General[56]. This was the situation in 2023. However, the PRMA has been amended again (2025) to allocate all of the ABFA for infrastructure projects, dubbed "the big push" by government.

Table 5.1: ABFA allocation to DACF since SC ruling in 2019 in the case of Kpodo v. AG

Year	ABFA (GH¢)	Estimated 5percent of ABFA	Transfer to DACF (GH¢)	Percentage of transfer (%)	Percentage deviation
2019	2,410,162,368	120,508,118	0	0	0
2020	1,291,227,015	64,561,351	0	0	0
2021	1,859,126,575	92,956,329	32,380,404	1.74	(65.17)
2022	4,411,919,420	220,595,971	105,281,567	2.39	(52.27)
2023	5,415,840,688.91	270,792,034.45	270,907,662.28	5	0

Source: Ministry of Finance

From the Table 5.1, the government, for the first time complied with the decision of the Supreme Court of Ghana and transferred an amount of GH¢ 270,907,662.28, representing five percent (5%) of the ABFA to the DACF in the reporting year (2023).

GHEITI'S Observation:

The decision by the Government of Ghana to amend the PRMA to allow for the application of the entirety of the ABFA to infrastructure is consistent with the spirit of the ABFA expenditure provisions in the PRMA. It is recalled that, during public consultations on the crafting of the

53 Currently, Ghana does not have a long-term development plan which guide public investment expenditure under the PRMA. GHEITI in its Oil and Gas reports for 2020, 2021 and 2023 explained how the nonexistence of this national plan allowed the government to classified consumption expenditure on education as part of public investment expenditure. The government in 2023 reversed the classification to align with government chart of accounts which classify public investment expenditure as expenditure on capital goods.

54 In GHEITI oil and gas reports for 2020, 2021 and 2023 found out that allocation to GIIF was not consistent and in 2017 to 2020, no allocation was made. The position of the government was that the law does not specify a minimum allocation but a maximum and therefore suggest that no allocation was not a legal breach. The GHEITI MSG holds view that no allocation to GIIF defeats the intention of the law.

55 See section 21 of the PRMA for provision on allocation to priority areas.

56 Kpodo v AG , File https://ghalii.org/gh/judgment/supreme-court/2019/39. GHEITI oil and gas report 2021-2022 pagexxx gives brief summary of the case and its implications on revenue allocation from the ABFA to sub-nationals.

PRMA between 2010 and 2011, a major issue for settlement was how much to spend? what to spend on? and how much to save? Discussions on how much to spend and on what, took into consideration lessons from the culture of spending mineral revenues predominantly on recurrent expenditure, for which reason Ghana has little to show for its decades of mineral extraction. The 70 percent capital and 30 percent recurrent ratio was a compromise by those who wanted all the petroleum revenues to be spent on capital projects to create jobs and lay the foundation for economic growth. It is again recalled that the PRMA provides for a maximum of four priority areas to be selected for ABFA expenditures in every medium term. The intention, ostensibly, is to limit the expenditure areas to avoid spreading the revenues too thin.

GHEITI further observes that the amendments appear to bring PIAC's finances under ministerial discretion. This has the potential effect of undermining the Committee's independence, as the Minister of Finance is subject to PIAC's oversight.

Recommendations:

- It is recommended that, the minister for finance ring-fenced projects being financed with oil revenues under the "Big Push" to enable PIAC report to its stakeholders on the use of petroleum revenues. Co-mingling funds will obscure the visibility of projects funded by petroleum revenues.
- The minister for finance should avoid spreading the petroleum-funded component of the "Big Push" too thin to minimise its impact.
- To guarantee its independence, the Finance Committee of Parliament should pay attention to PIAC's budget and ensure that its allocations do not suffer as a result of any adverse findings made against the Minister for Finance.

The GRA, in Section 3 of the PRMA, has a key role to assess, collect, and account for petroleum revenue due the Republic. To enable the GRA fulfil this responsibility, there is a mandatory requirement for an entity making payments into the PHF to notify the GRA in writing of that payment.

The current practice is that the Petroleum Unit of the Large Taxpayer Office of GRA confirms payment from the Petroleum Unit of the Bank of Ghana when a taxpayer notifies it of a payment into the PHF before a receipt is issued. GHEITI believes that GRA's function can be improved by giving the GRA an interface to be able to independently confirm payment and issue receipts to taxpayers who make payment to avoid discrepancies in reporting and delays in issuing receipts.

Performance of the Petroleum Funds

The performance of the Ghana Stabilisation and the Heritage Funds are highlighted below in Table 5.2

Table 5.2: Performance of the Ghana Stabilisation and the Heritage Funds

GHANA STABILISATION FUND													
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
		US$	US$	US$	US$	US$	US$	US$	US$	US$	US$	US$	US$
Opening Book Value	-	54,810,032	71,898,588	319,034,153	286,644,044	177,396,127	207,748,663	353,052,037	381,203,231	388,591,945	199,989,122	244,888,360	143,661,569
Receipts during the y	54,805,352.73	16,883,548	245,733,702	271,762,755	15,171,062	29,512,625	142,683,920	305,723,402	188,303,970	116,628,009	159,244,656	407,063,311	231,363,369
Income from Investm	4,679.27	214,049	1,413,341	1,549,380	538,215	845,150	2,625,276	6,409,693	8,222,605	2,319,826	646,522	376,328	4,828,203
Bank Charges	-	(9,041)	(11,477)	(17,556)	(6,397)	(5,238)	(5,822)	(9,048)	(7,444)	(9,864)	(9,524)	(10,081)	(3,556)
Sub Total	54,810,032	71,898,588	**319,034,153**	**592,328,733**	**302,346,924**	**207,748,663**	**353,052,037**	**665,176,084**	**577,722,362**	**507,529,916**	**359,870,776**	**652,317,918**	**379,849,585**
Less Transfer to:													
Contingency Fund		-	-	(17,433,144)	(23,755,073)	-	-	-	-	(218,948,849)	(114,982,416)	-	-
Debt Service / Sinking Fund		-	-	(288,251,545)	(47,510,146)	-	-	(283,972,853)	(189,130,418)	(88,591,945)	-	(508,656,350)	(189,468,141)
Annual Budget Funding Amount(ABFA)		-	-		(53,685,579)	-	-						
Closing Book Value	**54,810,032**	**71,898,588**	**319,034,153**	**286,644,044**	**177,396,127**	**207,748,663**	**353,052,037**	**381,203,231**	**388,591,945**	**199,989,122**	**244,888,360**	**143,661,569**	**190,381,444**
Investment Income	4,679	214,049	1,413,341	1,549,380	538,215	845,150	2,625,276	6,409,693	8,222,605	2,319,826	646,522	376,328	4,828,203
less:													
Bank Charges	-	(9,041)	(11,477)	(17,556)	(6,397)	(5,238)	(5,822)	(9,048)	(7,444)	(9,864)	(9,524)	(10,081)	(3,556)
Net return for the P	**4,679**	**205,008**	**1,401,864**	**1,531,824**	**531,818**	**839,912**	**2,619,454**	**6,400,645**	**8,215,161**	**2,309,962**	**636,998**	**366,247**	**4,824,647**

GHANA HERITAGE FUND													
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	Dec-23
		US$	US$	US$	US$	US$	US$	US$	US$	US$	US$	US$	US$
Opening book Value	-	14,401,216	21,694,221	128,125,943	248,915,220	259,383,473	276,962,292	344,792,662	485,172,437	579,612,333	644,787,191	726,537,955	918,223,454
Receipts during the y	14,400,002	7,235,806	105,314,444	116,469,752	6,501,884	12,648,268	61,150,251	131,024,315	80,701,702	49,983,433	68,247,710	174,455,705	99,155,729
Income from Investm	1,214	60,209	1,126,764	4,331,660	3,981,867	4,948,908	6,701,744	9,380,765	13,764,011	15,229,013	13,545,793	17,280,263	29,056,921
Bank Charges		(3,010)	(9,486)	(12,135)	(15,497)	(18,357)	(21,625)	(25,306.25)	(25,816)	(37,588)	(42,739)	(50,467)	(59,697)
Closing book Value	**14,401,216**	**21,694,221**	**128,125,943**	**248,915,220**	**259,383,473**	**276,962,292**	**344,792,662**	**485,172,437**	**579,612,333**	**644,787,191**	**726,537,955**	**918,223,454**	**1,046,376,408**
Investment Income	1,214	60,209	1,126,764	4,331,660	3,981,867	4,948,908	6,701,744	9,380,765	13,764,011	15,229,013	13,545,793	17,280,263	29,056,921
less													
Bank Charges		(3,010)	(9,486)	(12,135)	(15,497)	(18,357)	(21,625)	(25,306)	(25,816)	(37,588)	(42,739)	(50,467)	(59,697)
Net return for the P	**1,214**	**57,199**	**1,117,278**	**4,319,525**	**3,966,369**	**4,930,551**	**6,680,119**	**9,355,459**	**13,738,194**	**15,191,425**	**13,503,054**	**17,229,795**	**28,997,224**

COMBINED FUNDS													
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	Dec-23
Opening book Value	-	69,211,248	93,592,809	447,160,096	535,559,264	436,779,600	484,710,955	697,844,700	866,375,668	968,204,277	844,776,313	971,426,315	1,061,885,023
Receipts during the y	69,205,354	24,119,354	351,048,145	388,232,507	21,672,946	42,160,892	203,834,171	436,747,718	269,005,672	166,611,442	227,492,366	581,519,016	330,519,098
Income from Investm	5,893	274,258	2,540,105	5,881,040	4,520,081	5,794,058	9,327,021	15,790,458	21,986,616	17,548,839	14,192,315	17,656,591	33,885,125
Bank Charges	-	(12,051)	(20,963)	(29,691)	(21,894)	(23,595)	(27,447)	(34,354)	(33,261)	(47,452)	(52,263)	(60,548)	(63,254)
Sub Total	69,211,248	93,592,809	447,160,096	841,243,953	561,730,397	484,710,955	697,844,700	1,150,348,521	1,157,334,695	1,152,317,106	1,086,408,731	1,570,541,373	1,426,225,992
Less Transfer to:													
Contingency Fund	-	-	-	(17,433,144)	(23,755,073)	-	-	-	-	(218,948,849)	(114,982,416)	-	-
Debt Service Accoun	-	-	-	(288,251,545)	(47,510,146)	-	-	(283,972,853)	(189,130,418)	(88,591,945)	-	(508,656,350)	(189,468,141)
Annual Budget Fundi	-	-	-	-	(53,685,579)	-	-	-	-	-	-	-	-
Closing Book Value	**69,211,248**	**93,592,809**	**447,160,096**	**535,559,264**	**436,779,600**	**484,710,955**	**697,844,700**	**866,375,668**	**968,204,277**	**844,776,313**	**971,426,315**	**1,061,885,023**	**1,236,757,852**
Investment Income	5,893	274,258	2,540,105	5,881,040	4,520,081	5,794,058	9,327,021	15,790,458	21,986,616	17,548,839	14,192,315	17,656,591	33,885,125
less													
Bank Charges	-	(12,051)	(20,963)	(29,691)	(21,894)	(23,595)	(27,447)	(34,354)	(33,261)	(47,452)	(52,263)	(60,548)	(63,254)
Net return for the P	**5,893**	**262,207**	**2,519,142**	**5,851,350**	**4,498,187**	**5,770,463**	**9,299,573**	**15,756,104**	**21,953,355**	**17,501,387**	**14,140,052**	**17,596,042**	**33,821,871**

Source: Bank of Ghana

5.2 Subnational Transfers

As reported in the 2021/2022 report, Petroleum receipts are now subject to subnational transfers in compliance with the Supreme Court's decision in the case Kpodo v AG [57]. The main issue of the suit was that the amount allocated under Act 945 (i.e. the 2017 Appropriation Act) to the District Assembly Common Fund (DACF) was **not 5% of the total revenue** of that year, as required by Article 252(2) of the Constitution.

The 2019 Supreme Court ruling directed that in calculating the annual amount to be allocated to the DACF, the total revenue for that purpose shall include Petroleum Revenue allotted as ABFA and non-tax revenue paid to Central Government.

Until the ruling, there has never been a transfer from petroleum revenues to sub-national level. However, since the ruling, the Ministry of Finance has made efforts to comply with the requirement to transfer five (5) percent of the ABFA to the DACF. Evidence available to the MSG suggests that there is currently a quarters time lag of payment. For most part of 2023 the requirement has been met.

Table 5.1: ABFA allocation to DACF since SC ruling in 2019 in the case of Kpodo v. AG

Year	ABFA (GH¢)	Estimated 5percent of ABFA	Transfer to DACF (GH¢)	Percentage of transfer (%)	Percentage deviation
2019	2,410,162,368	120,508,118	0	0	0
2020	1,291,227,015	64,561,351	0	0	0
2021	1,859,126,575	92,956,329	32,380,404	1.74	(65.17)
2022	4,411,919,420	220,595,971	105,281,567	2.39	(52.27)
2023	5,415,840,688.91	270,792,034.45	270,907,662.28	5	0

Source: GHEITI's construct

5.3 Additional information on revenue management and expenditures

5.3.1 Budget and Audit processes

The budget statement presented every year has legal basis in Article 180 of the 1992 Constitution and Section 23 of the Public Financial Management Act, 2016 (Act 921).

Guidelines for preparation of annual budget is first issued consistent with Article 179 (1) of the 1992 Constitution and Section 20 of the Public Financial Management Act, 2016 (Act 921) and section 122 of the Local Governance Act, 2016 (Act 936) for the benefit of Ministries, Departments and Agencies (MDAs) as well as Metropolitan, Municipal and District Assemblies (MMDAs) not later than the 30th of June of every year.

The guideline sets out the following indicators and criteria:

1. Revenue forecasts and Fiscal targets
2. Medium-term fiscal framework

[57] Kpodo v AG , File https://ghalii.org/gh/judgment/supreme-court/2019/39

3. The multiple year ceilings for each covered entity in line with the State's Fiscal Strategy Document
4. The selection criteria for investment projects, including provision for linking forward recurrent expenditure estimates to investment[58]
5. The ceilings for local government authorities
6. Expenditure details for statutory funds and alignment with fiscal objectives.

In accordance with section 13(2) of the Public Financial Management Regulation, 2019 (L.I. 2378), the Ghana Integrated Financial Management Information System (GIFMIS)[59] shall be the core electronic platform for the preparation of the national budget and its execution.

The Minister shall, in consultation with the relevant stakeholders, prepare the proposed annual budget not later than 1st October of each financial year; and submit the proposed annual budget to Cabinet for approval not later than the 15th of October of each financial year.

Cabinet shall, not later than the 30th of October of each financial year, communicate to the Minister, the decision of Cabinet on the proposed annual budget.

The Minister shall, on behalf of the President, lay before Parliament not later than the 15th of November of each financial year, estimates of the revenues and expenditure of the Government, the annual budget, for the ensuing financial year.

The estimates of expenditure of all public offices and public corporations other than those set up as commercial ventures, shall (a) be classified under programs or activities in the Appropriation Bill to be introduced into Parliament,

The Minister shall present the Annual Budget accompanied with the Appropriation Bill and any other Bill that is required to implement the annual budget;

And shall, publish in the Gazette, the Appropriation Act on or before the 31st of December of each financial year.

Parliament shall, by the 31st of December of each financial year, consider and approve

(a) the Annual Budget and the correlative work plan of Government for the ensuing financial year;

(b) the Appropriation Bill; and

(c) any other Bill that may be required to implement the annual budget

The annual budget, approved by Parliament, takes effect from the 1st day of January of the ensuing year.

5.3.1.1 Implementation

Pursuant with Section 27 of the PFM Act, 2016 (Act 921), Performance Report of each Principal Account Holder shall, within the first quarter of the ensuing year after the Minister submits the

[58] Investment projects are highlighted under the Integrated Bank of Projects as part of the Public Investment Management System within the Ghana Integrated Financial Management Information System, in furtherance of the Public Financial Management Regulations, 2019 (L.I. 2378); See section 1 of Public Financial Management Regulations, 2020 L.I. 2411

[59] See https://mofep.gov.gh/sites/default/files/acts/PFM-Regulations-2019.pdf

Annual Budget to Parliament, submit to Parliament, a report on budget implementation for the proceeding financial year.

The Principal Account Holder shall submit a copy of the performance report required to the Minister indicating the achievements of the Principal Account Holder for the preceding financial year and the annual work plan comprising the objectives, outputs, outcomes, targets and performance indicators.

5.3.1.2 Mid-Year Review

The Minister shall, not later than the 31st of July of each financial year, prepare and submit to Parliament a mid-year fiscal policy review.

The mid-year fiscal policy review shall include an analysis of the total revenue, expenditure and financing performance for a period up to the first six months of the financial year and a revised budget outlook for the unexpired term of the financial year,

and the implication of the revised budget outlook for the Medium-Term Fiscal and Expenditure Framework if necessary; and where necessary, plans for submitting a proposed supplementary budget for approval by Parliament.

5.3.1.3 Internal and External Audit

The Internal Audit Unit of covered entities shall appraise and report on the soundness and application of the system of controls operating in the covered entity and provide assurance on the efficiency, effectiveness in the administration of the programs and evaluate compliance of a covered entity with enactments, policies, standards, systems and procedures.

In accordance with Section 83(10) of Act 921, where the Internal Auditor of a covered entity suspects that a Principal Spending Officer is involved in fraud or misuse of public funds, the Internal Auditor shall report the matter to the Director-General of the Internal Audit Agency who shall in consultation with the chairperson of the relevant Audit Committee initiate investigations into the matter.

The Auditor-General shall, within six months after the end of each financial year, examine and audit the public accounts submitted in accordance with Article 187 of the Constitution and the Audit Service Act, 2000 (Act 584).[60]

REVENUE SUSTAINABILITY AND RESOURCE DEPENDENCE.

This includes the assumptions underpinning forthcoming years in the budget cycle and relating to projected production, commodity prices and revenue forecasts arising from the extractive industries and the proportion of future fiscal revenues expected to come from the extractive sector.

[60] Section 84 of PFM Act 2016 https://mofep.gov.gh/sites/default/files/reports/economic/PUBLICpercent20FINANCIALpercent20MANAGT.percent20percent20ACTpercent2Cpercent202016.pdf

Growth Projections

The industry sector of which minerals and oil and gas are subcomponents is expected to record a sustained and robust average medium-term (2024-2027) growth of 4.5 percent, based on growth performances of 3.7 percent, 4.2 percent, and 5.2 percent in 2024, 2025, and 2026 respectively.

The 2023 crude oil output volume was estimated at 52.61 million barrels averaging 144,145 barrels of crude oil per day. This was subsequently revised to 46.28 million barrels in the 2023 Mid-Year Budget.

Projected gas offtake is also projected to increase from about 450 MMscfd in 2023 to about 600 MMscfd in 2026.

2023 Benchmark Projections[61]

Consistent with section 10 of the First Schedule (Section 17) of the PRMA (Act 815) as amended, the Benchmark crude oil price for 2023 was projected at US$88.55 per barrel, down from the price of US$94.83 per barrel used in the 2022, an alignment with similar benchmarks by reputable international institutions such as the IMF, Bloomberg and the World Bank. The 2023 Benchmark crude oil price was revised in the mid-year of 2023 to US$74.00 following global developments and weakened demand for crude oil.

The gas price for 2023 was projected at US$6.46 per MMBtu, estimated as a seven-year moving average in line with the PRMA.

The 2023 Benchmark crude oil output volume was estimated at 52.61 million barrels, averaging 144,145 barrels of crude oil per day, based on a three-year simple average of each producing field's actual and projected outputs in line with the PRMA.

The Benchmark gas output volume has been estimated at 107.55 trillion Btu for 2023.[62] The Evolution of Government Projections are shown in the Table 5.3.

Table 5.3: Crude Oil Benchmark Projections

Items	Unit	2021	2022	2023	2024	2025	2026
Crude Oil Production	MBbl	64.86	59.51	52.61 / 46.28	52.96 / 51.37	54.97 / 53.4	56.17
Price	US$/Bbl	54.75	61.23	88.55/ 74.00	75.57/ 70.90	78.09/ 72.04	84.06/ 76.61
Petroleum Revenue[1]	US$Mn	885.7		1,008.65	1,288.63	1,393.47	1,681.72

Source: GHEITI's construct (2025)

2023 Projected Revenue Allocation

The projected petroleum receipts for 2023 is US$1,484.47 million, revised to US$1,008.65 in the 2023 Midyear Budget. The total petroleum receipts are made up of Royalties (US$261.36 million),

[61] 2024 Budget Statement was available at time of compiling 2021 / 2022 GHEITI Report so forward estimates in 2024 National Budget were used to reflect most recent estimates.

[62] The gas output was converted from Bcf to trillion Btu using the conversion factor of 1,060 btu / scf.

Carried and Participating Interest (US$678.46 million), Corporate Income Tax (US$543.65 million) and Surface Rentals (US$1.0 million). Of the amount of US$1,484.47 million), US$368.83 million was ceded to the National Oil Company (GNPC) for its Equity Financing Cost (US$236.13 million) and its share of the net Carried and Participating Interest (US$132.70 million)

Table 5.4: Projected Revenue Allocation

Fiscal Item		2023	2024	2025	2026
Royalties	US$m	261.36	220.29	233.12	254.92
o/w Crude Oil	US$m	261.36	220.29	233.12	254.92
o/w Gas	US$m	0	0	0	0
CAPI	US$m	678.46	573.06	608.13	665.39
o/w Crude Oil	US$m	678.46	573.06	608.13	665.39
o/w Gas	US$m	0	0	0	0
Corporate Tax	US$m	543.65	663.30	748.96	782.43
Surface Rentals	US$m	1.0	1.07	1.08	0
TOTAL REVENUE	US$m	1,484.47	1,457.71	1,591.29	1,702.74

Source: MoF

The Benchmark Revenue is estimated at US$1,115.64 million. A total of US$780.95 million was allocated to the Annual Budget Funding Amount (ABFA), while the Ghana Petroleum Funds (GPFs) receive US$334.69 million.

The GPFs receipts will be distributed between the Ghana Stabilisation Fund (US$234.28 million) and Ghana Heritage Fund (US$100.41 million).

Table 5.5: GPFs receipts Distribution

Fiscal Item		2023	2024	2025	2026
Transfer to NOC/GNPC	US$m	268.83	263.37	271.35	312.99
o/w Equity Financing	US$m	236.13	130.65	127.02	161.96
o/w 30percent CAPI	US$m	132.70	132.72	144.33	151.03
Benchmark Revenue	US$m	1,115.64	1,194.34	1,319.94	1,389.75
o/w ABFA	US$m	780.95	836.04	923.96	972.82
o/w Transfer to GPF	US$m	334.69	358.30	395.98	416.92
o/w Ghana Stabilisation Fund	US$m	234.28	250.81	277.19	291.85
o/w Ghana Heritage Fund	US$m	100.41	107.49	118.80	125.08
TOTAL Amount Distributed	US$m	1,484.47	1,457.71	1,591.29	1,702.74

Source: GHEITI's construct (2025)

Total petroleum receipts are projected at, US$1,484.47, US$1,457.71 million, US$1,591.29 million, and US$1,702.74 million for, 2023, 2024, 2025 and 2026, respectively

Table 5.6: Projected Gas Offtake (2023-2026)

Expected Gas Offtake (MMscfd)	2022	2023	2024	2025	2026
SANKOFA	201	170	173	180	198
JUBILEE	116	112	112	112	112
TEN	9.4	12.6	13	13	13
LNG	55	125	148	187	225
N-GAS	30	30	50	50	50
TOTAL	410	449	496	542	598

Source: GNPC, 2022

Table 5.7: Projected Gas Commodity Costs (2022-2026)

SUMMARY COSTS	2022	2023	2024	2025	2026
Weighted Aggregate Service Cost	1.3937	1.2930	1.2090	1.1310	1.0557
Intermediation Service Cost	0.0855	0.0855	0.0855	0.0855	0.0855
Gas Management Service Cost	0.0659	0.0673	0.0657	0.0668	0.0686
WAGP Transmission Cost (Takoradi-Tema	2.4248	2.5388	2.6581	2.7378	2.7926
VGIF Service Cost	0.0150	0.0150	0.0150	0.0150	0.0150
West -Kumasi Pipeline Financing Cost	1.7817	1.7817	1.7817	1.7817	1.7817
Weighted Average Commodity Cost	6.5206	7.3848	7.7344	8.0212	8.3148

Source: GNPC, 2022

SECTION SIX: SOCIAL AND ECONOMIC SPENDING

This section covers disclosures related to revenue management and expenditures, helping stakeholders to assess whether the extractive sector is leading to the desirable social, economic and environmental impacts and outcomes. The EITI Requirements related to revenue allocations include: (6.1) social and environmental expenditures by companies; (6.2) SOE quasi-fiscal expenditures; (6.3) an overview of the contribution of the extractive sector to the economy; and (6.4) the environmental impact of extractive activities.

6.1 Social and Environmental Expenditures by Extractive Companies

There were no mandatory social expenditure in 2023. In Ghana, social expenditures are mandatory, pseudo-mandatory and voluntary. They aim at securing the social licence to operate. Under the Petroleum Exploration and Production Act, 2016 (Act 919), all oil and gas companies are encouraged to have a positive impact on local communities.

Section 100 of the Income Tax Act, 2015 (Act 896) entitles a person who make a contribution or a donation to a worthwhile cause approved by the Government to claim a deduction that is equal to the amount of contribution or donation made by that person when determining the chargeable income of that person.

The approved worthwhile causes by the government include contributions to scholarship scheme, development of rural or urban areas and sports development or promotion. The Commissioner General of Ghana Revenue Authority is also empowered to approve any other worthwhile cause.

Corporate social investment expenditures of extractive companies are required to meet the threshold of section 100 of Act 896 in order to be tax deductibles in computing the chargeable income of the companies.

The mandatory contributions are prescribed by law or subject to a contractual agreement between the State and the companies. On the other hand, pseudo-mandatory contributions are those CSI commitments that are not prescribed in law between the State and oil producing companies but in a bilateral agreement between an oil producing company and its host communities. The residual module which involves voluntary contribution does not involve an agreement but an arrangement where an oil-producing company commits to community development through social interventions.

6.1.1 Environmental Expenditures by Companies in 2023

The Environmental Processing and Permitting fees are mandatory payments with a fee schedule that can be accessed via the link[63].

6.2 SOE Quasi Fiscal Expenditure

On 8th June 2021, the MSG at a stakeholder engagement with Parliament, PIAC, BoG, GNPC, MoF, and CSOs, adopted a definition of Quasi Fiscal Expenditure (QFE) to include the arrangements whereby SOE(s) undertake social expenditure such as:

[63] Laws & Regulations – Environmental Protection Authority, Ghana

- Payment for social services;
- Public infrastructure;
- National debt servicing;
- Loan agreements;
- Asset purchases; and
- Such other goods and services.

These goods and services should ordinarily be provided by either the Central or Local Government. If a State Owned Enterprise wants to provide these goods and services, they must be well-documented and pre-approved by Parliament. In 2023, the government provided guidelines on Quasi Fiscal activities of State entities and how they are to be reimbursed as part of the State Ownership Policy for Specified Entities.

6.3 Contribution of Oil and Gas to Ghana's Economy

6.3.1 Contribution of Petroleum Revenue to Total Government Revenues

The petroleum sector total receipt of US$1,062.32 million in 2023 contributed about nine percent (9.35 percent) to total government revenue for the year, and 9.54 percent to domestic revenues. Table 6.1 below indicates the annual petroleum receipts from 2017 to 2024 with their respective percentage contributions to total government revenues.

Table 6.1: Contribution of Petroleum Revenue to Total Government Revenues / Domestic revenues

ITEM	2017	2018	2019	2020	2021	2022	2023	2024
Total Revenue& Grants (in GH¢ Mn)	39,694.50	47,636.73	53,379.61	55,138.21	70,918.09	96,651.24	136,011.25	186,593.30
Domestic Revenue (in GH¢ Mn)	38,159.66	46,501.93	52,393.49	53,909.52	69,735.88	95,532.67	133,359.58	184,877.63
Oil Revenue (in GH¢ Mn)	2,407.71	4,491.43	4,887.97	3,746.15	4,900.31	12,061.85	12,625.25	19,833.83
Oil Revenue (in US$ Mn)	555.33	977.12	937.58	666.39	783.33	1,428.76	1,062.32	1,357.79
Total Expenditure (in GH¢ Mn)	50,182.57	58,196.96	67,856.11	96,410.21	109,534.63	168,848.21	167,514.30	279,204.54
ABFA (in GH¢ Mn)	859.57	2,169.34	2,763.77	2,771.12	2,442.77	6,502.97	6,519.33	10,831.27
Memo Items								
Oil Revenue percent of Total Revenue (%)	6.07	9.43	9.16	6.79	6.91	12.48	9.28	10.63
Oil Revenue percent of Domestic Revenue (%)	6.31	9.66	9.33	6.95	7.03	12.63	9.47	10.73
ABFA percent of Total Expenditure (%)	1.71	3.73	4.07	2.87	2.23	3.85	3.89	3.88

Source: Ministry of Finance

6.3.2 Contribution to Gross Domestic Product

The upstream oil and gas sector in Ghana contributed 4.82 percent to the Gross Domestic Product (GDP) of Ghana in 2023 and recorded a declining growth rate of 0.20 percent (at constant 2013 prices). Table 6.2 shows the annual GDP and the percentage contribution of the upstream oil and gas sector.

Table 6.2: Annual GDP and the Percentage Contribution of the Upstream Oil and Gas Sector 2017-2024

Item	Unit	2017	2018	2019	2020	2021	2022	2023 * *	2024
Gross Domestic Product At Basic Prices	GH¢ Million	244,394.00	286,964.00	333,626.00	368,106.00	431,152.00	576,000.00	830,243.90	1,091,068.70
Oil and Gas GDP current Prices	GH¢ Million	9,023.00	16,971.00	21,335.00	13,793.00	21,082.00	32,939.00	37,275.00	48,014.80
Gross Domestic Product (GDP) at Constant 2013 Prices	GH¢ Million	146,146.00	155,207.00	165,308.00	166,157.00	174,592.10	181,235.10	186,926.00	197,376.00
Oil and Gas GDP constant prices	GH¢ Million	11,279.00	12,175.00	13,932.00	13,288.00	11,617.00	10,627.00	10,255.00	10,411.00

Source: Ministry of Finance

Table 6.3: Oil Contribution to GDP

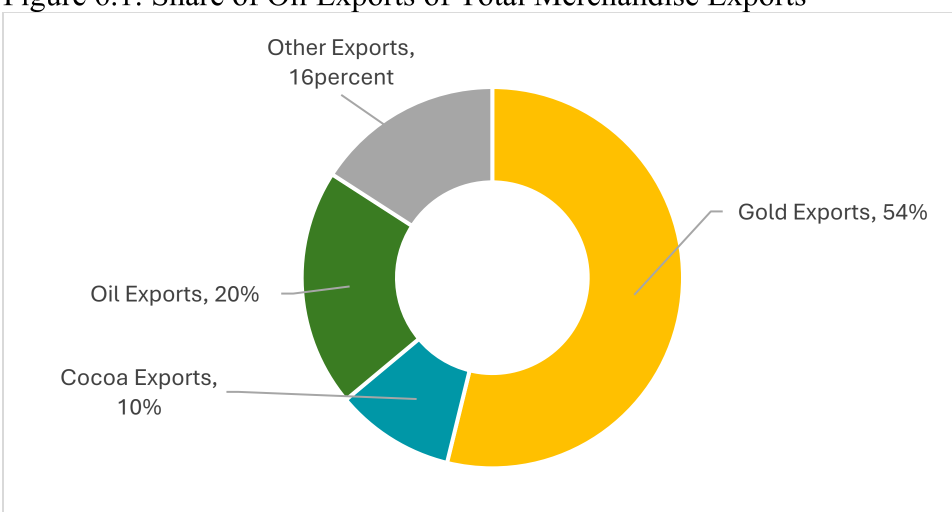
Item	2017	2018	2019	2020	2021	2022	2023	2024**
Oil Contribution to Real GDP Growth rate percent (%)	80.32	7.95	14.44	-4.63	-12.57	-8.53	-3.50	1.11
Oil Contribution to GDP sectoral shares basic prices (%)	3.69	5.91	6.39	3.75	4.89	5.72	4.49	4.37

Source: GHEITI's construct based on data from Ghana Statistical Service[64]

6.3.3 Contribution to Merchandise Exports

In 2023, total exports amounted to US$16.64 billion. Out of the total exports of US$16.64 billion, crude oil exports amounted to about US$3.87 billion, representing 20 percent of total exports. Crude oil export was 29.30 percent lower than the previous year 2022 crude oil export of US$5.43 billion. Although gold remained the dominant export earner at US$10.31 billion (54 percent), oil exports exceeded both cocoa (US$1.94 billion) and other exports (US$3.04 billion), making it the second-largest export commodity after gold. This underscores the continued importance of the petroleum sector to Ghana's external trade performance and revenue generation. Figure 6.1 provide an overview of crude oil contributions to Government export revenues.

Figure 6.1: Share of Oil Exports of Total Merchandise Exports



Source: *GHEITI construct from export data published by Bank of Ghana*

[64]https://statsghana.gov.gh/nationalaccount_macros.php?Stats=MjQyODAxMDY3NC42Mzg=/webstats/227532q92p

Energy Transition

Ghana's energy transition involves a lot more than just switching to renewable energy sources from fossil fuels. It originates from the nation's overarching objectives for development, which include a resilient economy based on sustainable natural resource use, new jobs for a young workforce, affordable and dependable power for homes and businesses. Ghana continues to shift its focus from planning to gradual implementation, adjusting the policy's course while implementing doable measures to increase efficiency, diversify the energy mix, and attract investments for low-carbon growth.

The National Energy Transition Framework (NETF) 2022–2070, which describes Ghana's plans to cut emissions while sustaining growth, serves as the cornerstone of the country's current transition program. This framework served as a guide for sector-wide reforms, development partner engagements, and stakeholder discussions in 2023. In order to localise the Framework's suggestions, the National Energy Transition Committee which was led by the Ministry of Energy conducted a number of regional and stakeholder meetings. The committee's main focus was on how communities, businesses, and subnational authorities might cooperate with the transition roadmap.

A major shift during 2023 was the move to shape the investment side of the transition. Ghana worked with SEforALL, the Climate Policy Initiative, and the US Government to refine the Ghana Energy Transition and Investment Plan, which sets out priority investment pipelines, especially in renewable energy generation, grid modernization, and clean cooking. The objective was to build a bankable platform for mobilising concessional finance and climate investment. This work positioned Ghana for stronger engagement at COP28 and with international climate finance windows.

According to Ghana’s Renewable Energy Master Plan, the country aims to scale up its renewable electricity-generation capacity from about 42.5 MW in 2015 to approximately 1,363.63 MW by 2030, with around 1,094.63 MW being grid-connected. The plan also targets renewables-based electrification for 1,000 off-grid communities.

In practice, the Bui Power Authority has taken visible steps by mid-2023. They had installed a total of 55 MWp of solar PV (including a 5 MWp floating solar installation on the Bui reservoir), which already corresponds to roughly 28percent of the 2021-25 cycle target under the Renewable Energy Master Plan (REMP). Meanwhile, in the mini-grid/off-grid space, official survey data showed Ghana had only five PV-diesel mini-grids totalling 379 kW as of 2020, which indicates the off-grid component remains at a much earlier stage relative to the ambition set in the Master Plan.

A significant area of progress was e-mobility and clean transport. The Ministry of Energy and the Energy Commission worked on the draft National Electric Vehicle (EV) Policy, outlining incentives for EV imports, charging standards, and private sector partnerships for charging infrastructure. Private actors in Accra and Kumasi introduced small-scale EV taxi and e-motorbike pilots. While early-stage, these efforts signaled a shift in how transport decarbonization is being approached.

In 2023, the Ghana National Gas Limited Company (GNGLC) signed a Project Implementation Agreement (PIA) with its consortium partners for the construction of “GPP Train 2” (GPP II), at an estimated cost of US$ 700 million. This milestone reinforced Ghana’s strategic commitment to natural gas as a transition fuel, with investments in gas processing and gas-to-power infrastructure prioritised to reduce reliance on expensive and volatile petroleum imports. The initiative is positioned as a bridge to scale up renewable energy over time, while simultaneously supporting Ghana's industrialisation ambitions through a reliable, domestic energy supply.

Another strategic development in 2023 was progress on nuclear energy planning. The Nuclear Power Institute advanced preparatory assessments and continued engagement with vendors and the International Atomic Energy Agency (IAEA). The government maintained that nuclear would be a future baseload option to complement renewables and ensure long-term energy security.

Clean cooking remained a critical aspect of the transition. LPG expansion programs continued, while attention increased on improved biomass cookstoves and financing models for clean household energy. However, progress remained slower than desired, largely due to affordability challenges and distribution barriers.

Finally, the extractive sector became more central to transition discussions. The Minerals Commission and the Ministry of Lands and Natural Resources advanced policy discussions on critical minerals such as lithium. The aim was to encourage domestic value addition for battery and green technology supply chains, linking Ghana's mineral endowment directly to the global energy transition.

6.3.4 Contribution to employment

Refer to appendix 6 for details of the employment data on company by company and gender disaggregated basis

6.4 Environmental Impact Of Extractive Activities

6.4.1 General Environmental Assessment Process of The Environmental Protection Agency

The Environmental Protection Agency Act, 1994 (Act 490) established the EPA as the lead agency for environmental management and protection in Ghana, with a mandate to oversee, coordinate and regulate all issues regarding the environment. The Act can be accessed via the link[65].

6.4.1.1 Legal and Legislative Provisions for Environmental Assessment

Pursuant to Section 62 of Act 490, the Environmental Assessment Regulations, (L.I. 1652) was enacted in 1999 to provide the necessary specific and complete legal backing for the Environmental Assessment (EA) system/ procedure in Ghana. The Agency is further mandated under L.I. 1652 to ensure compliance with laid down EIA procedures in the planning and execution of developmental projects, including petroleum (oil and gas).

The First and Second Schedules of L.I. 1652 provide guidance on the appropriate level of environmental assessment that a proposed undertaking must adhere to, to form the basis for decision-making and permitting. Large-scale projects, with significant environmental impacts, are typically categorised as Second Schedule projects/ undertakings in the L.I. 1652 for which an Environmental Impact Statement (EIS) is a pre-requisite (mandatory) to permitting. Similarly, small-scale and medium-scale impact projects fall under the First Schedule, for which a Preliminary Environmental Assessment (PEA) is required for permitting. Further to the First and

65 https://ghalii.org/akn/gh/act/1994/490/eng@1994-12-30

Second Schedules, the Fifth Schedule of L.I. 1652 contains a descriptive list of environmentally sensitive areas for which due caution must be exercised in the consideration of proposed undertakings that are in such areas.

Thus, new companies or existing companies proposing new projects, including petroleum (oil and gas), are therefore expected to conduct a PEA (Regulation 9) or an EIA (Regulation 10) depending on the nature and scale of the project and presents their findings in reports known as Environmental Impact Statements (EIS) for large scale projects and Preliminary Environmental Reports (PERs) for the small and medium scale projects. Under the law, all EISs and PERs are required to be publicly available and accessible. Hence, EPA keeps copies of these reports in its office libraries across the country. In addition, EPA sends copies of these reports to the Metropolitan, Municipal, and District Assemblies (MMDAs) in which a particular project is taking place for public access. The Agency also put the Non-Technical Executive Summary (NTS) of the EIA report on the website of the Petroleum Department of the Agency. The reports can be accessed via the link[66].

Updates on Environmental Regulatory Reforms as at 2025

On 6th January, 2025 the Environmental Protection Act, 2025 (Act 1124) was passed and has repealed the EPA Act, 1994 (Act 490). Act 1124 has amended and consolidated the laws relating to environmental protection, established the Environmental Protection Authority to regulate and protect the environment; provide for pesticide control and regulation; provide for the control, management and disposal of hazardous waste, electrical and electronic waste, as well as provide for the coordination of climate change responses and related matters. The Authority has an enhanced mandate to regulate, protect, coordinate, and exercise general oversight over all matters relating to climate change and the environment. The Act can be accessed via the link[67].

Subsequently in July 2025, the Environmental Assessment Regulations, 1999 (L.I. 1652) have also been repealed by a new Environmental Protection (Environmental Assessment) Regulations to address gaps and emerging issues encountered during its implementation, as well as give full effect to the Authority's expanded mandate under the Environmental Protection Act, 2025 (Act 1124). The new regulation is titled the Environmental Protection (Environmental Assessment) Regulations 2025, (L.I. 2504). The regulations can be accessed via the link[68]. A specific Environmental Petroleum Regulations for Oil and Gas activities which will address environmental issues in oil and gas operations was passed in July 2025. This regulation is titled the Environmental Protection (Petroleum) Regulations 2025, (L.I. 2509)

6.4.1.2 Fees and Charges

There are legal provisions for the payment of fees in respect of the grant of environmental permits or certificates for multi-sector undertakings, including the extractive sector as stated in Act 490 and L.I, 1652 and the determination of which, are set out in a separate Fees and Charges Instrument which is periodically reviewed and approved by the Parliament of Ghana.

The current applicable fees are as specified in the Fees & Charges (Miscellaneous Provisions) Act, 2022 (Act1080). The fees and charges can be accessed via the link[69].

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66 www.epaoilandgas.org
67 https://www.epa.gov.gh/new/laws-regulations/
68 https://www.epa.gov.gh/new/laws-regulations/
69 https://www.epa.gov.gh/new/laws-regulations/

These fees cover the various stages of the project lifecycle (exploration, development, exploitation, and decommissioning) for which an environmental permit or certificate will be issued. The Fees and Charges Schedule also includes administrative charges for non-compliance with the general provisions of L.I. 1652 and permit conditions.

6.4.1.3 Public Participation

Public participation is thoroughly enshrined in the EA process/system of Ghana. The L.I. 1652 sets out guidelines for public consultations and engagements. This includes:

- Publication of notices for Scoping and EIS (Regulation15 and Regulation 16 respectively). In respect of Scoping, the form in the Third Schedule is to be used, as well as EIS (form in Fourth Schedule); making available copies of these reports at designated locations, as well as providing mediums for collating and incorporating concerns relating to these proposed undertakings. Companies are expected to ensure that Gender issues as well as those of other vulnerable groups, are given special attention during the consultations.

- Public hearings (Regulation 17). The condition(s) that trigger the need for a Public Hearing in respect of a proposed undertaking are listed in Regulation 17 as:
    - (c) great adverse public reaction to the commencement of a proposed undertaking upon a notice issued under Regulation 16 of L.I. 1652;
    - (c) one causing the dislocation, relocation or resettlement of communities; or
    - (c) one which the Agency considers could have extensive and far-reaching effect on the environment.

- General and targeted consultations. Also required are several other general and targeted consultations with key stakeholders including communities within the project catchment areas prior to permitting and over the life of the project as outlined in the draft Public Participation Guidelines in Environmental Assessment. For Oil and Gas production, the targeted engagements include Regional House of Chiefs, Civil Society and Media, MMDAs, Women Groups, Vulnerable Groups such as Persons with Disability (PWD) and the general public.

6.4.1.4 Environmental Management Plan

After a company is permitted for executing its initial proposed project, it is required to prepare an Environmental Management Plan (EMP) leading to the issuance of an environmental certificate in respect of any undertaking for which a Preliminary Environmental Report (PER) or Environmental Impact Statement (EIS) was approved, within eighteen (18) months of commencement of operations and thereafter to be updated every three (3) years.

L.I. 1652 also has a provision for any undertaking which was in operation prior to the coming into force of the legislation to submit an EMP to the EPA to enable the Agency permit its activities. This provision is really a transitional regulation but is still used by the Agency if a company is found to have started its operations without any permit from the Agency.

The Environmental Management Plan sets out steps that are intended to be taken to manage any significant environmental impact(s) that may result from the operation of the undertaking within the three (3) year certification period and contains an Environmental Action Plan (EAP), which indicates the particular actions, timelines, budgetary allocations, among others necessary for mitigating identified impacts against which routine monitoring is undertaken to ensure compliance. The EMP is not publicly accessible due to confidential company considerations such as technology and trade secrets.

6.4.1.5 Environmental Permit/Certificate

An environmental permit or certificate issued to a company includes a schedule of conditions, which serves as the control measures for the environmental laws of the country. The schedule of conditions is attached to the permit or certificate and outlines the various actions necessary to ensure the validity of same in the specified or indicated period. These conditions are project and sector specific, but a couple are statutory, such as submission of:

- periodic (monthly, quarterly, semi-annually, and annually) environmental quality (air, water, effluent, noise) monitoring reports;
- Annual Environmental Reports; and
- Environmental Management Plan.

6.4.1.6 Environmental Monitoring

The L.I. 1652 also sets out modalities not only for compliance monitoring in respect of proposed undertakings but also for permitted projects. As such, companies are required to do environmental baseline surveys before commencement of activities of the project. This is to enable them measure changes that are taking place in the environment because of their operations. The Agency also undertakes routine announced and unannounced monitoring visits to ensure general compliance with the L.I. 1652 and the permit conditions. The monitoring activities are intended to ensure that the conditions of the permit or certificate as well as specific actions contained in the project-approved environmental assessment reports are complied with.

Non-compliance with permit conditions constitutes an offence and various sanctions can be applied as per Act 490 and LI 1652, such as the issuance of enforcement notices, imposition of administrative charges, fines/penalties and suspension, revocation or cancellation of environmental permits/ certificates. The oil companies have been issued a number of administrative charges due to non-compliance.

Hence, as an example, oil and gas companies in compliance with the requirements do baseline environmental survey of the offshore environment before field development and thereafter a three (3)-yearly marine benthic and water column monitoring survey to check for changes.

The Agency has developed draft guidelines titled “Offshore Marine Environmental Monitoring Guidelines” to guide the conduct of all marine environmental monitoring in offshore oil and gas operations.

6.4.1.7 Environmental Audit

Act 490 under Section 2 also mandate the Agency to ensure compliance with the laid down EA procedures in the planning of development projects, including compliance in respect of existing projects. The Agency as such conduct inspections, investigations and audits into environmental issues concerning companies that it has permitted. To formalise, provide guidance to its officers and have a uniform process of inspections and audits, the Agency published an Inspection and Audit Manual in 2021.

The list of oil and gas companies that have been audited by the Agency are published periodically on the oil and gas website of the Agency and can be accessed via the link[70].

6.4.1.8 Grievance Redress Mechanism

In furtherance to its bid to promote transparency and accountability as well as increase stakeholder involvement in sound environmental management, the Agency has a Grievance Redress Mechanism (GRM) in place that assists its clients and the general public to resolve environmentally related complaints and grievances in a prompt, effective and efficient manner. The GRM document is available to the public at the Agency's website for download. The document can be accessed via the link[71].

6.4.1.9 Decommissioning

Decommissioning of oil and gas facilities are provided in Sections 43 to 49 of the Petroleum (Exploration and Production) Act, 2016 (Act 919). Section 45 specifically states: "A licensee or contractor shall establish a decommissioning fund as prescribed" and Section 48 (1) states, "A contractor or a licensee who is under an obligation to implement an approved decommissioning plan under section 44 is subject to strict liability towards the Republic for any loss or damage caused, in connection with the decommissioning of the facility or other implementation of the decommissioning plan."

EPA's oil and gas draft regulations, which is yet to be passed by Parliament also provides for decommissioning of petroleum facilities. The oil companies are supposed to submit Environmental Impact Assessment of the decommissioning and obtain a permit before commencement of the decommissioning. This was done during the decommissioning application for the Saltpond field. The approved Environmental Report forms part of the requirement for the decommissioning plan to be approved by the Minister in Charge of Energy.

6.4.1.10 Carbon Markets and Carbon Pricing

Ghana has thoroughly evaluated a range of policy options for achieving its Green House Gas (GHG) emission reduction targets in the Nationally Determined Contribution (NDC). Carbon pricing and carbon markets were also examined. Therefore, Ghana conducted a study to assess the viability of carbon pricing and carbon market options. The assessment identified the potential introduction of a carbon tax and participation in the Article 6 cooperative approach under the Paris Agreement.

Relatedly, the Government introduced a vibrant Article 6 agenda. It prepared a framework for the international carbon market[72], followed by bilateral engagement with five countries (Switzerland, Sweden, Singapore, South Korea and Liechtenstein). Institutional structures have been set up to support the implementation of the carbon market in Ghana, including the Carbon Market Office (CMO)[73].

70 www.epaoilandgas.org

71 https://rb.gy/dbhzrj

72 https://cmo.epa.gov.gh/wp-content/uploads/2022/12/Ghana-Carbon-Market-Framework-For-Public-Release_15122022.pdf

73 https://cmo.epa.gov.gh/

Out of the framework, the CMO developed a project preparation cycle to guide project development by entities. It also established the Ghana Carbon Registry (GCR)[74] host the project database, track and record carbon credits and transactions. To date, the GCR has identified 84 projects in the pipeline, of which 35 have been fully onboarded.

Regarding the carbon tax, the Ghana Emissions Levy Act, officially the Emissions Levy Act, 2023 (Act 1112), was passed by Ghana's Parliament to impose a levy on carbon dioxide equivalent emissions from specified sectors and internal combustion engine vehicles. The Act, intended to generate revenue for sector reforms and promote a green economy, was repealed on 26th March, 2025, after facing significant public and business opposition. There are also existing indirect carbon taxes that complement carbon pricing in the country. Examples of these include the sanitation tax, the fuel tax, and the import penalty for vehicles over 10 years old.

GHEITI's Observations:

It is observed that gas flaring by the oil-producing companies continue to pose a challenge. The cause of the elevated flaring is largely due to equipment breakdown and reservoir management issues. In 2023, Tullow paid administrative charges of US$621,000.00 for elevated flaring due to reservoir management issues. Eni on the other hand paid US$120,000 administrative charges for elevated flaring due to prolong equipment breakdown. Inadequate infrastructure to convey gas produced offshore to the market as well as inadequate facilities onshore to utilize the gas are also accountable for the elevated flaring of gas.

Recommendations

GHEITI recommends that the expansion of gas evacuation and utilisation infrastructure should be expedited to reduce the routine offshore gas flaring.

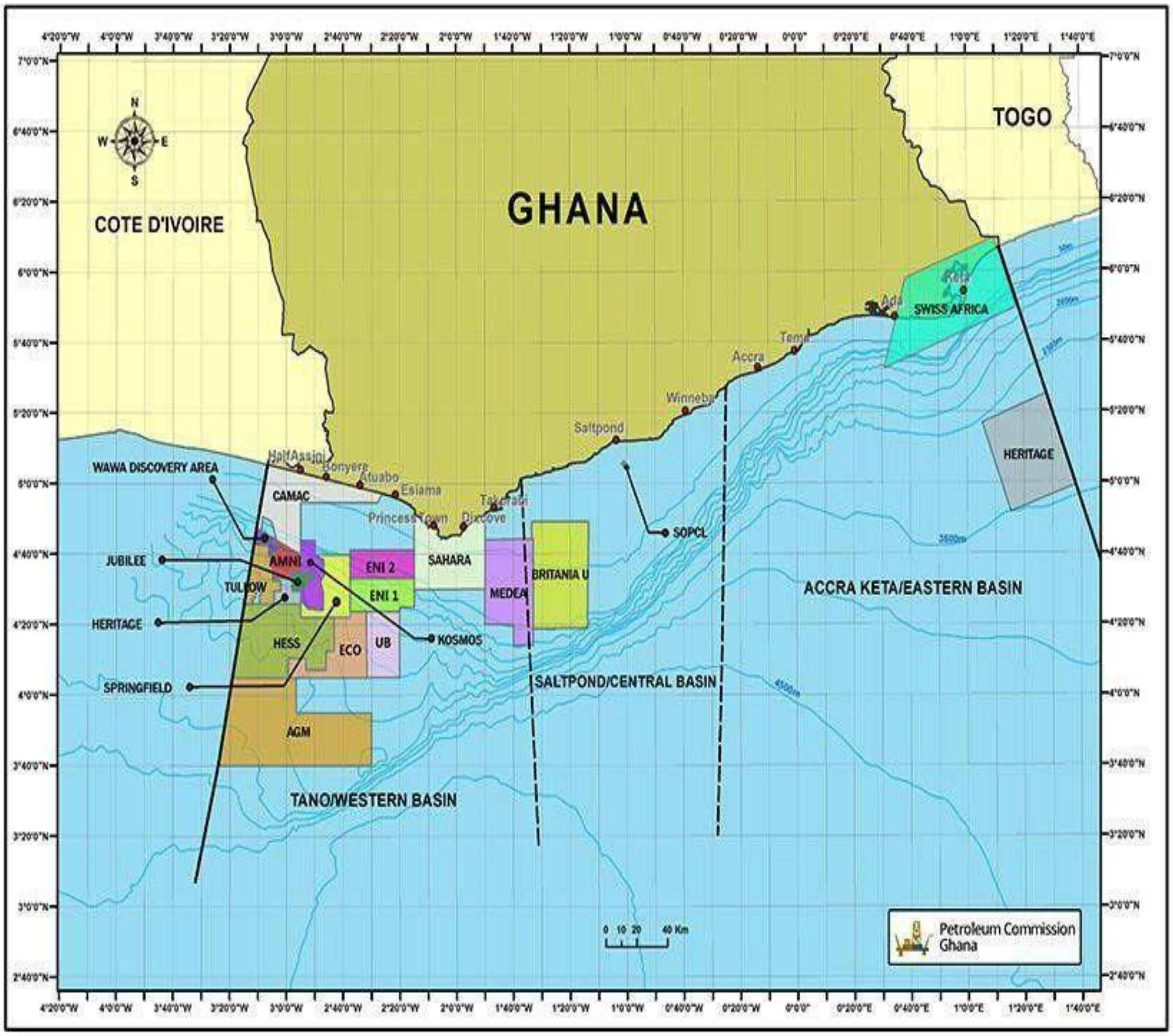
There should be a deliberate policy to encourage the use of natural gas by Thermal Plants which are using Light and Heavy crude for electricity generation.

6.4.2 Key regions/areas where production is concentrated

The current three producing fields are all situated offshore in the Tano Cape Three Points in the Western Region of Ghana. Figure 7 shows the three offshore Basins.

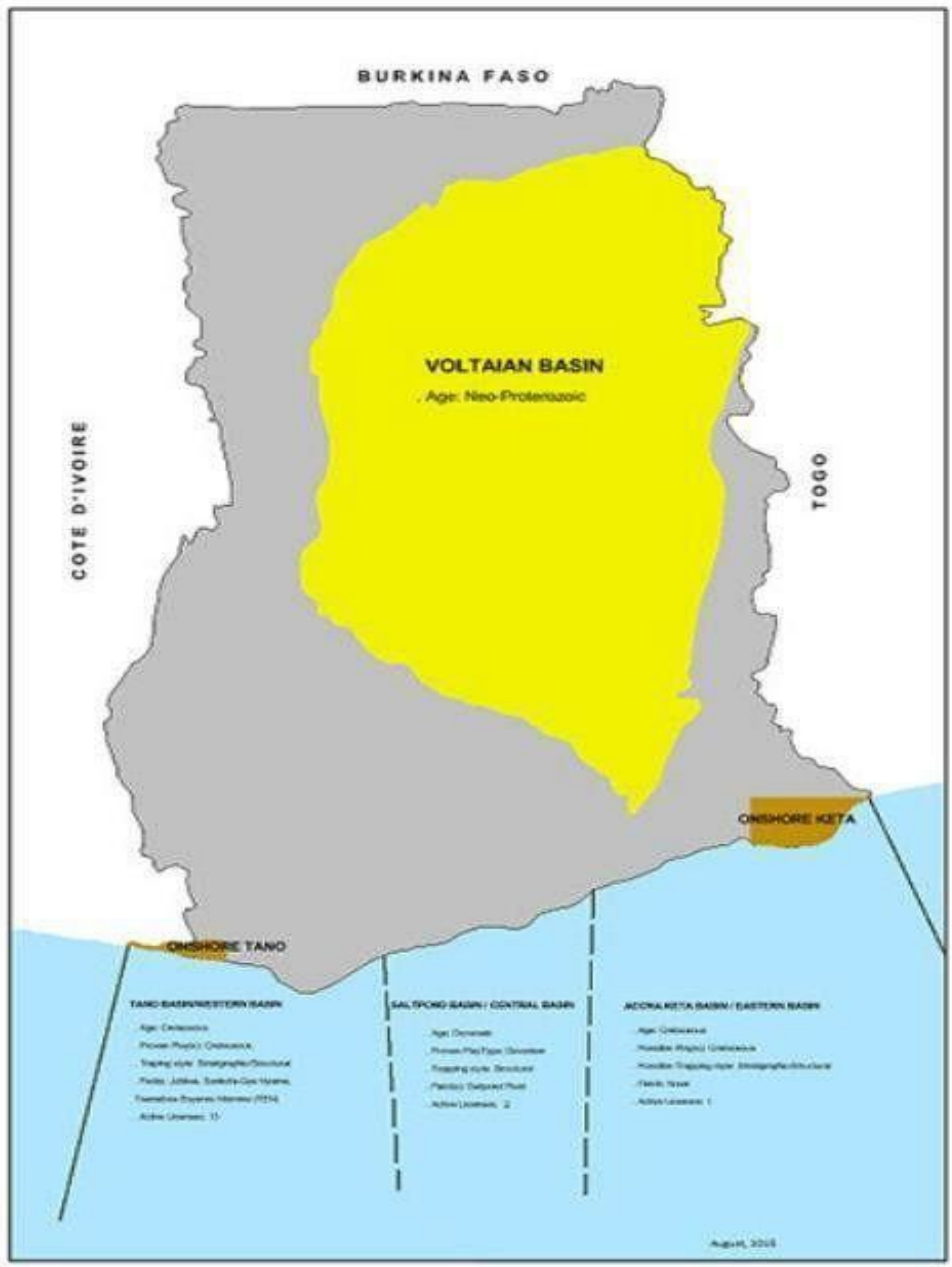
Figure 6.2: Activity Map of Ghana

[74] https://gcr.epa.gov.gh/



Source: Petroleum Register, Petroleum Commission https://www.ghanapetroleumregister.com

Figure 6.3: Map of Ghana's sedimentary basins indicating inland Voltaian basins



SECTION SEVEN: OUTCOMES AND IMPACTS

This section covers the outcomes and impacts of EITI disclosures, including how the disclosures contribute to wider public debates on resource governance and revenue management, as well as lessons learnt, and actions on EITI recommendations. The EITI Requirements under this section are: (7.1) Public debate; (7.2) Data accessibility and open data; (7.3) Recommendations from EITI implementation; and (7.4) Review of the outcomes and impacts of EITI implementation.

7.1 Public Debate

The Ghana EITI MSG undertakes series of activities targeted at promoting public debate around the findings and recommendations of the Ghana EITI Reports. These activities are done through engagements with diverse stakeholders, press releases, and other publications, among others. The 2021-2022 GHEITI Reports were launched on 24th July, 2024 to set the stage for the dissemination and awareness creation of the Report.

The report was published on the GHEITI website and can be accessed through the following link[75]. To help with the dissemination of the report, GHEITI ensured a strong media involvement in its dissemination activities. The MSG uses its dissemination activities to address the accessibility gap, focusing on regional and subnational stakeholders. These in-depth discussions highlight some of the odd problems that exist at the subnational level and are crucial to the search for local solutions to the local problems, while the broader national issues are addressed through national policy reforms. Following are links to media articles on the launch and other dissemination activities on the 2021-2022 GHEITI reports:

https://gna.org.gh/2024/07/gheiti-launches-2021-22-reconciliation-reports/
https://www.newsghana.com.gh/2021-2022-gheiti-report-on-mining-oil-and-gas-launched/
https://ghanaiantimes.com.gh/hold-local-authorities-chiefs-others-responsible-for-surge-in-galamsey-dr-manteaw

During dissemination of GHEITI reports, opportunities are afforded stakeholders, especially host communities to respond to the findings and recommendations contained in the reports. The local government authorities are also given the opportunity to respond to the community feedback. In 2024 for instance, during the dissemination of the 2021-2022 reports in the Bono Region, impacted communities from Ahafo Kenyasi and its environs expressed dissatisfaction about the management of the district's share of mineral royalties, and demanded greater transparency and accountability in the allocation and use of the revenues. Concerns bordered on the excessive use of the revenues to fund recurrent expenditures, especially refuse collection, to the neglect of capital projects, which the communities insisted were critical for local economic development.

7.2 Data Accessibility and Open Data

The MSG is committed to the promotion of transparency in the extractive sector through an

75 https://www.gheiti.gov.gh/site/index.php?option=com_phocadownload&view=sections&Itemid=54

open and easy accessibility of data on the sector's activities. This commitment is expressed in the form of a policy statement accessible via the link. Furthermore, the MSG has taken steps to ensure data from its 2021-2022 reports are published on its website in an open data format.

7.3 Implementation of EITI Recommendations

Following the publication of every EITI report, GHEITI writes to all stakeholder institutions that are affected by the findings of the published reports to officially notify and encourage them to take steps to implement the recommendations. In the course of the year, the affected stakeholder institutions are engaged in a technical session to discuss progress and challenges associated with the implementation of the recommendations.

For instance, after the launch of the GHEITI 2021-2022 reports, a meeting was convened with the affected institutions in October, 2024 to share the findings from the 2021-2022 GHEITI reports and encourage them to implement the recommendations. In December, 2025, the MSG reengaged the affected institutions on the progress made following the earlier engagement on the findings and recommendations.

Table 7.1 Highlights Some of the Key Findings And Recommendations from the 2021-2022 Reports

NO	OBSERVATIONS	RECOMMENDATIONS	RESPONSIBLE AGENCY	IMPLEMENTATION STATUS
1	GNPC is Government's designated partner for all upstream petroleum contracts, including gas sales. Following a 2020 Cabinet decision, Ghana National Gas Company (GNGLC) was appointed as the new gas aggregator. The decision is oblivious of the fact that GNGLC is not party to the petroleum contracts and therefore lacks capacity to play the role of gas aggregator unless the gas contracts are amended to make GNGLC party to them. For this reason, cabinet's decision cannot be fully implemented.	Government must reconsider and reverse its decision given the difficulty in its implementation.	MoE&GT, GNGLC, and GNPC	The decision has been reversed. GNPC is currently responsible for the gas aggregatorship role.

Source: GHEITI's Construct

7.4 Review of the Outcomes and Impacts of EITI Implementation

Some of the ways in which feedback from stakeholders beyond MSG members have been considered in the review of the outcomes and impact of EITI implementations are:

- GHEITI shares information at national and international conferences and receives feedback from the audience. For instance, GHEITI's retreat at the beginning of the year was opened to non-GHEITI members and stakeholders;

- Engagement with media houses and receiving feedback from viewers and listeners of the various media outlets;
- Feedback from presentations made at public events and fora;
- Feedback from publications based on GHEITI's data ; and
- Feedback from engagements with Sub-national entities.

Date of MSG approval of this submission: 29th December, 2025

FINDINGS AND RECOMENDATIONS

LEGAL AND INSTITUTIONAL FRAMEWORK, CONTRACTS AND LICENSES

1. <u>Revamping the Upstream Petroleum Sector</u>

GHEITI's Observation

In the 2024 manifesto of the NDC Government, it promised to increase targeted exploration activities to establish new reserves by rebuilding investor confidence through policy and regulatory clarity, consistency, predictability, transparency and governance and attract world-class investors. It also promised to innovate multi-field development systems that optimise development infrastructure and allow profitable production of otherwise marginal fields.

To this end, the Government has:

i. Withdrawn the 2020 unitisation directives, resulting in the appraisal of the Afina Discovery in the West Cape Three Points Block 2 Contract Area.

ii. Initiated the review of the Petroleum (Exploration and Production) Act, 2016 (Act 919) and its regulations to improve predictability and transparency and make the fiscal regime more flexible.

iii. Signed a Memorandum of Understanding (MoU) with the Jubilee and Tweneboa Enyenra Ntomme (TEN) Fields partners for the extension of the periods of the West Cape Three Points (WCTP) and the Deep Water Tano (DWT) Petroleum Agreements to enable them to undertake further investments to optimally develop the petroleum resources in these Contract areas. These investments include infrastructure-led exploration in development and production areas.

iv. Commenced discussions to construct a second gas processing plant to encourage the development and utilisation of the country's natural gas resources.

The Government has demonstrated its commitment to implementing the country's Energy Transition Plan by changing the Ministry of Energy's name to the Ministry of Energy and Green Transition and by pursuing a strategic five-point agenda to accelerate the nation's shift towards sustainable energy. This includes:

- The establishment of a Renewable Energy and Green Transition Fund to drive innovation and investment in sustainable energy.
- The deployment of smart solar-powered streetlights nationwide as a measure to transition to solar-powered systems to enhance public safety while reducing the financial burden on the State's utilities.
- Deployment of renewable energy mini-grids.
- Enactment of a Bill to establish a Renewable Energy Authority. This is currently undergoing technical review.
- Implementing an open and competitive process for renewable energy capacity procurement. This approach is expected to ensure competitive pricing, attract credible investors, and accelerate the green transition agenda.

STATE PARTICIPATION

2. Providing Clarity on Gas Aggregatorship Role

GHEITI's Observation:

As reported in the GHEITI 2021-2022 Oil and Gas Report, Cabinet directed on 11th May 2020, that the Ghana National Gas Limited Company (GNGLC) be assigned the national Gas Aggregatorship role, effectively expanding its mandate upstream and positioning it as the central entity responsible for the aggregation, marketing, and sale of natural gas. Following this directive, GNGLC participated in the Jubilee Post-Foundation Gas Sales Agreement (GSA) negotiations with Tullow Ghana Limited and the other Jubilee partners.

However, beyond its involvement in these post-foundation gas negotiations, GNGLC has not fully operationalised or assumed the Gas Aggregatorship role in practice. The existing Gas Sales Agreements, all of which predate the 2020 Cabinet decision, remain with GNPC, and have not been transferred to GNGLC. As a result, the institutional and commercial arrangements required for GNGLC to function as the sole Gas Aggregator have not been implemented, and GNPC continues to hold key responsibilities associated with gas marketing and sales.

Government's action amounts to amending the GNPC's statute of establishment which grants the Gas Aggregator role to GNPC through an administrative process

Recommendations:

i. The Government should consider withdrawing the directive assigning the Gas aggregator role to GNGLC

ii. Furthermore, the Government should amend the relevant legislation to give proper effect to the Government's intended objectives if it wants GNGLC or some other institution to play the gas aggregator role.

3. Payment of proceeds of JOHL/ Explorco's seven percent acquisition into the Petroleum Holding Fund

GHEITI's Observation

On 15th of October 2021, GNPC announced that it had acquired seven percent Commercial Interest in both the Jubilee and TEN fields from Occidental Petroleum (Oxy) for a purchase price of US$199 million effective 1st April, 2021[76].

GNPC announced that it had successfully transferred all the interest which was initially held by Jubilee Oil Holding Limited (JOHL), an external company registered in Cayman Island, to its subsidiary called GNPC Exploration and Production Company Limited (Explorco) on 15th November, 2023.

76 Refer to GHEITI's 2020 Oil and Gas Report published on 31 December 2024 for commentary on the acquisition. Report accessible at GHEITI's website.

In 2021-2022 GHEITI Oil and Gas Report, GHEITI held that in accordance with Section 3 of the PRMA income from petroleum activities earned directly or indirectly needed to be paid into the PHF and that not doing do so amounts to a violation of the Act.

EXPLORATION AND PRODUCTION

4. Reversing Declining Upstream Investment and Production

GHEITI'S Observation

Ghana's crude oil output has declined from its highest point of 71 million barrels in 2019 to 48 million barrels in 2023 with production falling for four consecutive years since 2019. Although GHEITI acknowledges that all 3 fields are in their mature stages of production and as such declines in production are to be expected, the MSG is particularly concerned about the general lack of investment in the upstream sector which would not only lead to new discoveries being developed but also reduce risks in the country's offshore basin by acquiring more data.

In the last two years, Ghana's upstream petroleum sector has struggled to attract new investment due to stalled licensing rounds, regulatory disputes, and unresolved project delays. Key cases include the Sankofa-Afina fields unitisation dispute between Eni and Springfield and the resulting misunderstandings between Eni and the state, which affected upstream investments of the biggest oil company in Ghana, Aker Energy's delayed Pecan project, the absence of new petroleum agreements since 2018 and the exit of ExxonMobil in 2021.

The GHEITI MSG also highlights that disagreements over fiscal policy, caused by unclear guidelines and limited consultation with wider stakeholders such as the Tullow Oil versus GRA dispute regarding branch profit tax that proceeded to arbitration in London in 2023, and the enactment of the Growth and Sustainability Levy Act, 2023 (Act 1095) which imposed an additional one percent tax on gross production of International Oil Companies (IOCs) generate uncertainty for prospective upstream investors.

Conversely, the more favourable fiscal framework, fast-track approvals, and strategic national investment in energy infrastructure in neighbouring Ivory Coast have made it a more appealing destination for upstream oil and gas investment. The Baleine discovery by ENI in 2021 saw ENI commit US$10 billion in investment to develop the field, which led to commercial production beginning in August 2023.

Recommendations

- The Ministry of Finance should ensure fiscal predictability.
- The Petroleum Commission should ensure regulatory certainty, contract sanctity, and avoid retroactive application of new laws.
- A thorough examination of Ghana's regulatory system to eliminate bottlenecks causing project delays is essential for the country to maximise benefits from prospective investors.
- Taking a more consultative approach when introducing and implementing policies might prevent expensive arbitration procedures that damage the nation's image as an attractive place for investment.
- Petroleum Commission should ensure the acquisition of high-quality data
- Petroleum Commission should consider investing in basic exploration infrastructure to attract private investments into exploration while reducing the associated cost for investors.

5. Disclosure of Disaggregated Greenhouse Gas Emissions Data

GHEITI's Observation

The GHEITI Multi-Stakeholder Group (MSG) observes that although oil and gas companies operating in Ghana submit emissions-related data to the EPA, these reports are not routinely published or disaggregated at the company or project level for public access. Consequently, GHEITI was unable to independently obtain verifiable, company-specific GHG emissions data for the oil and gas sector for the 2023 reporting year.

The MSG notes that this limitation reflects an institutional disclosure gap, rather than non-compliance by reporting entities. At the time of reporting, there was no established public-facing platform through which GHG emissions data submitted to the EPA can be accessed by stakeholders in a consistent and transparent manner.

Recommendations:

The MSG recommends that the Environmental Protection Authority (EPA) publishes an annual disaggregated greenhouse gas (GHG) emissions summary for the oil and gas sector, based on emissions data already submitted by companies, as part of EPA's existing annual reporting outputs.

The MSG further recommends that the EPA establishes a dedicated webpage to serve as a central access point for GHG emissions information, including disclosure outputs, sector-level emissions trends over time, and explanatory notes on GHG reporting requirements and data use in national climate reporting.

REVENUE COLLECTION

6. Description of Stage of Implementation of Oil-funded Projects in Reconciliation Reports

GHEITI's Observation

GHEITI has observed that, though Section 48(1) of the PRMA requires the Minister for Finance to prepare a reconciliation report on the petroleum funds and submit same to Parliament as part of the presentation of the annual national budget statement, and to describe in the report, the stage of implementation of all oil-funded projects, this requirement was not complied with between 2011 and 2017. The infraction was brought to the attention of Parliament in 2017, at the joint Committee sitting of Mines and Energy and Finance. After extensive deliberation on the matter, the committee instructed the Minister to take steps to comply with the law in its next report or risk the rejection of the report in 2018.

In 2018, an attempt was made to comply with the requirement in question by stating percentages of completion of projects funded with oil revenue. It is GHEITI's view that stating percentage completion does not adequately respond to the requirement to "describe" the state of completion.

In 2023, the Minister in his Reconciliation Report on the petroleum funds, again failed to describe the state of completion of all-funded projects.

It appears that, the inability of the finance ministry to keep faith with this requirement is as a result of the thinly spread of projects financed with oil revenue.

Recommendations

1. GHEITI wishes to entreat Parliament to ensure full compliance with Sect. 48(1) of the Petroleum Revenue Management Act, mandating a description of the state of completion of all oil-funded projects.

2. To help with compliance with the requirement to describe the state of completion of oil-funded projects, the Minister for Finance is encouraged to limit the spread of oil-funded projects to a few legacy infrastructure undertakings.

REVENUE MANAGEMENT AND DISTRIBUTION

7. 2025 PRMA Amendments and Matters Arising

GHEITI'S Observation:
The decision by the Government of Ghana to amend the PRMA to allow for the application of the entirety of the ABFA to infrastructure is consistent with the spirit of the ABFA expenditure provisions in the PRMA. It is recalled that, during public consultations on the crafting of the PRMA between 2010 and 2011, a major issue for settlement was how much to spend? what to spend on? and how much to save? Discussions on how much to spend and on what, took into consideration lessons from the culture of spending mineral revenues predominantly on recurrent expenditure, for which reason Ghana has little to show for its decades of mineral extraction. The 70 percent capital and 30 percent recurrent ratio was a compromise by those who wanted all the petroleum revenues to be spent on capital projects to create jobs and lay the foundation for economic growth. It is again recalled that the PRMA provides for a maximum of four priority areas to be selected for ABFA expenditures in every medium term. The intention, ostensibly, is to limit the expenditure areas to avoid spreading the revenues too thin.

GHEITI further observes that the amendments appear to bring PIAC's finances under ministerial discretion. This has the potential effect of undermining the Committee's independence, as the Minister of Finance is subject to PIAC's oversight.

Recommendations:
- It is recommended that, the minister for finance ring-fenced projects being financed with oil revenues under the "Big Push" to enable PIAC report to its stakeholders on the use of petroleum revenues. Co-mingling funds will obscure the visibility of projects funded by petroleum revenues.
- The minister for finance should avoid spreading the petroleum-funded component of the "Big Push" too thin to minimise its impact.
- To guarantee its independence, the Finance Committee of Parliament should pay attention to PIAC's budget and ensure that its allocations do not suffer as a result of any adverse findings made against the Minister for Finance.

8. Improving coordination between GRA and Bank of Ghana in Petroleum Revenue Collections

GHEITI's Observation
The GRA, in Section 3 of the PRMA, has a key role to assess, collect, and account for petroleum revenue due the Republic. To enable the GRA fulfil this responsibility, there is a mandatory requirement for an entity making payments into the PHF to notify the GRA in writing of that payment.

The current practice is that the Petroleum Unit of the Large Taxpayer Office of GRA confirms payment from the Petroleum Unit of the Bank of Ghana when a taxpayer notifies it of a payment into the PHF before a receipt is issued.

Recommendation
To improve GRA's function, GHEITI recommends giving the GRA an interface to be able to independently confirm payment and issue receipts to taxpayers who make payment to avoid discrepancies in reporting and delays in issuing receipts.

SOCIAL AND ECONOMIC SPENDING

9. Addressing Gas Flaring Challenges

GHEITI's Observations:

It is observed that gas flaring by the oil-producing companies continue to pose a challenge. The cause of the elevated flaring is largely due to equipment breakdown and reservoir management issues. In 2023, Tullow paid administrative charges of US$621,000.00 for elevated flaring due to reservoir management issues. Eni on the other hand paid US$120,000 administrative charges for elevated flaring due to prolong equipment breakdown. Inadequate infrastructure to convey gas produced offshore to the market as well as inadequate facilities onshore to utilize the gas are also accountable for the elevated flaring of gas.

Recommendations

GHEITI recommends that the expansion of gas evacuation and utilisation infrastructure should be expedited to reduce the routine offshore gas flaring.

There should be a deliberate policy to encourage the use of natural gas by Thermal Plants which are using Light and Heavy crude for electricity generation.

Appendix 1: In Scope Companies for the 2023 Oil And Gas Reconciliation Report

https://www.gheiti.gov.gh/site/index.php?option=com_phocadownload&view=category&download=557:appendix-1-in-scope-companies-for-the-2023-oil-and-gas-reconciliation-report&id=84:2023&Itemid=54

Appendix 2: Out of Scope Companies

https://www.gheiti.gov.gh/site/index.php?option=com_phocadownload&view=category&download=560:appendix-2-out-of-scope-companies&id=84:2023&Itemid=54

Appendix 3: Details of Reconciliation
Appendix 3A: Company's Name: Kosmos HC

TIN: C0003831426
REPORTING PERIOD: 2023

	2023		COMPANY			GOVERNMENT		FINAL AMOUNTS			UNRESOLVED	
No.	**Revenue Stream**	**Paid To**	**Initial Amount US$**	**Resolved**	**Final**	**Initial Amount US$**	**Resolved**	**Final**	**Company**	**Government**	**Over**	**Under**
OIL & GAS												
1	Carried Interest	GRA			0			0	0	0	0	-
2	Additional Participating Interest	GRA			0			0	0	0	0	-
3	Royalty	GRA			0			0	0	0	0	-
4	Surface Rental	GRA			0			-	-	-	-	-
5	Corporate Tax	GRA	76,270,327		76,270,327	71,928,857		71,928,857	76,270,327	71,928,857	4,341,470	4,341,470
6	Training Obligations/Fees	PC/GNPC			0			0	0	0	-	-
7	Permit Renewal Fess	PC			0							
	TOTAL		76,270,327	-	76,270,327	71,928,857	-	71,928,857	76,270,327	71,928,857	4,341,470	4,341,470

Source: GHEITI's Construct

Appendix 3B: Tullow

COMPANY'S NAME: TULLOW
TIN: C0002551888
REPORTING PERIOD: 2023

2023			COMPANY			GOVERNMENT			FINAL AMOUNTS		UNRESOLVED	
No.	**Revenue Stream**	**Paid To**	**Initial Amount US$**	**Resolved**	**Final**	**Initial Amount US$**	**Resolved**	**Final**	**Company**	**Government**	**Over**	**Under**
OIL & GAS												
1	Carried Interest	GRA			0			0	0	0	0	-
2	Additional Participating Interest	GRA			0			0	0	0	0	-
3	Royalty	GRA			0			0	0	0	0	-
4	Surface Rental	GRA	77,725		77,725	77,725		77725	77,725	77,725	-	-
5	Corporate Tax	GRA	157,206,436		157,206,436	157,206,436		157,206,436	157,206,436	157,206,436	-	-
6	Training Obligations/fees	PC/GNPC	350,000		350,000	350,000.00		350,000.00	350,000.00	350,000.00	-	-
7	Permit renewal Fess	PC			0							
	TOTAL		157,634,161	-	157,634,161	157,634,161	-	157,634,161	157,634,161	157,634,161	-	-

Source: GHEITI's Construct

Appendix 3C: GNPC

COMPANY'S NAME: GNPC
TIN: V0003107108
REPORTING PERIOD: 2023

	2023		COMPANY			GOVERNMENT			FINAL AMOUNTS		UNRESOLVED	
NO.	**REVENUE STREAM**	**PAID TO**	**INITIAL AMOUNT US$**	**RESOLVED**	**FINAL**	**INITIAL AMOUNT US$**	**RESOLVED**	**FINAL**	**COMPANY**	**GOVERNMENT**	**OVER**	**UNDER**
OIL & GAS												
1	Carried Interest	GRA	403,141,908	(60,440,268)	342,701,641	470,673,746	(127,972,105)	342,701,641	342,701,641	342,701,641	-	-
2	Additional Participating Interest	GRA	148,118,861	(20,146,756)	127,972,105	-	127,972,105	127,972,105	127,972,105	127,972,105	-	-
3	Royalty	GRA	219,608,785		219,608,785	219,608,785		219,608,785	219,608,785	219,608,785	-	-
4	Surface Rental	GRA			-			-	-	-	-	-
5	Corporate Tax	GRA			-			-	-	-	-	-
6	Training Obligations/fees	PC/GNPC	300,000.00		300,000	300,000		300,000	300,000	300000	-	-
7	Permit renewal Fess	PC			-						-	-
	TOTAL		771,169,554	(80,587,023)	690,582,531	690,582,531	-	690,582,531	690,582,531	690,582,531	-	-

Source: GHEITI's Construct

Appendix 3D: Kosmos Investments

KOSMOS INVESTMENTS
TIN:
REPORTING PERIOD: 2023

	2023		COMPANY			GOVERNMENT			FINAL AMOUNTS		UNRESOLVED	
No.	Revenue Stream	Paid To	Initial Amount US$	Resolved	Final	Initial Amount US$	Resolved	Final	Company	Government	Over	Under
OIL & GAS												
1	Carried Interest	GRA			0			0	0	0	0	-

	2023		COMPANY			GOVERNMENT			FINAL AMOUNTS		UNRESOLVED	
No.	Revenue Stream	Paid To	Initial Amount US$	Resolved	Final	Initial Amount US$	Resolved	Final	Company	Government	Over	Under
2	Additional Participating Interest	GRA			0			0	0	0	0	-
3	Royalty	GRA			0			0	0	0	0	-
4	Surface Rental	GRA			0			-	-	-	-	-
5	Corporate Tax	GRA	120,962,283		120,962,283	120,962,283.00		120,962,283	120,962,283	120,962,283	-	-
6	Training Obligations/Fees	PC/GNPC			0			0	0	0	-	-
7	Permit Renewal Fess	PC			0							
	TOTAL		120,962,283	-	120,962,283	120,962,283	-	120,962,283	120,962,283	120,962,283	-	-

Source: GHEITI's Construct

Appendix 3E: ENI Ghana E&P

COMPANY'S NAME: ENI GHANA E&P

TIN: C0003664996

REPORTING PERIOD: 2023

	2023		COMPANY			GOVERNMENT			FINAL AMOUNTS		UNRESOLVED	
No.	**Revenue Stream**	**Paid To**	**Initial Amount US$**	**Resolved**	**Final**	**Initial Amount US$**	**Resolved**	**Final**	**Company**	**Government**	**Over**	**Under**
OIL & GAS												
1	Carried Interest	GRA			0			0	0	0	0	-
2	Additional Participating Interest	GRA			0			0	0	0	0	-
3	Royalty	GRA			0			0	0	0	0	-
4	Surface Rental	GRA	112,010		112010	112,010		112,010	112,010	112,010	-	-
5	Corporate Tax	GRA			-			-	-	-	-	-
6	Training Obligations/fees	PC/GNPC	2,200,000		2200000	2,200,000		2,200,000	2,200,000	2,200,000	-	-
7	Permit renewal Fess	PC			0							
	TOTAL		2,312,010	-	2,312,010	2,312,010	-	2,312,010	2,312,010	2,312,010	-	-

Source: GHEITI's Construct

Appendix 4: Reconciliation By Government

Appendix 4A: 2023-Payment Of Carried Interest: Reconciliation Between Companies and GRA

NO.	OIL/GAS COMPANY	GOV'T AGENCY	PAYMENT BY COMPANY(US$)	RECEIPT BY GRA(US$)	DISCREPANCY	RESOLVED	FINAL COMPANY
1	Kosmos HC	GRA					
2	Tullow Ghana Ltd	GRA					
3	GNPC	GRA	403,141,908	470,673,746	-67,531,838	127,972,105	342,701,641

NO.	OIL/GAS COMPANY	GOV'T AGENCY	PAYMENT BY COMPANY(US$)	RECEIPT BY GRA(US$)	DISCREPANCY	RESOLVED	FINAL COMPANY
4	Kosmos Investments GH Ltd	GRA					
5	ENI EXP &PROD LTD	GRA					
	TOTAL		**403,141,908**	**470,673,746**	**(67,531,838)**	**127,972,105**	**342,701,641**

Source: GHEITI's Construct

Appendix 4B: 2023 Payment of Additional Participating Interest: Reconciliation between Companies and GRA

NO.	OIL/GAS COMPANY	GOV'T AGENCY	PAYMENT BY COMPANY (US$)	RECEIPT BY GRA (US$)	DISCREPANCY	RESOLVED	FINAL COMPANY
1	Kosmos HC	GRA					
2	Tullow Ghana Ltd	GRA					
3	GNPC	GRA	148,118,861	0	148,118,861	-127,972,105	127,972,105
4	Kosmos Investments GH Ltd	GRA					
5	ENI EXP &PROD LTD	GRA					
	TOTAL		**148,118,861**	**-**	**148,118,861**	**(127,972,105)**	**127,972,105**

Source: GHEITI's Construct

Appendix 4C :2023 Payment Of Royalty: Reconciliation Between Companies and GRA

NO.	OIL/GAS COMPANY	GOV'T AGENCY	PAYMENT BY COMPANY(US$)	RECEIPT BY GRA(US$)	DISCREPANCY	RESOLVED	FINAL COMPANY
1	Kosmos HC	GRA	-				
2	Tullow Ghana Ltd	GRA			-		

NO.	OIL/GAS COMPANY	GOV'T AGENCY	PAYMENT BY COMPANY(US$)	RECEIPT BY GRA(US$)	DISCREPANCY	RESOLVED	FINAL COMPANY
3	GNPC	GRA	219,608,785	219,608,785	0	0	219,608,785
4	Kosmos Investments GH Ltd	GRA	-	-	-	-	-
5	ENI EXP &PROD LTD	GRA	-	-	-	-	-
	TOTAL		**219,608,785**	**219,608,785**	**-**	**-**	**219,608,785**

Source: GHEITI's Construct

Appendix 4D: 2023 Payment Of Corporate Tax: Reconciliation Between Companies and GRA.

No.	Oil/Gas Company	Gov't Agency	Payment by company(US$)	Receipt by GRA(US$)	Discrepancy	Resolved	Final Company
1	Kosmos HC	GRA	76,270,327	71,928,857	4,341,470	-4,341,470	76,270,327
2	Tullow Ghana Ltd	GRA	157,206,436	157,206,436	-	0	157,206,436
3	GNPC	GRA	0	0	0	0	0
4	Kosmos Investments GH Ltd	GRA	120,962,283	120,962,283	-	-	120,962,283
5	ENI EXP &PROD LTD	GRA	-	0	-	0	0
	TOTAL						**354,439,046**

Source: GHEITI's Construct

Appendix 4E : 2023 Payment Of Training Obligations: Reconciliation Between Companies and PC/GNPC

NO.	OIL/GAS COMPANY	GOV'T AGENCY	PAYMENT BY COMPANY (US$)	RECEIPT BY GRA (US$)	DISCREPANCY	RESOLVED	FINAL COMPANY
1	Kosmos HC	PC					

NO.	OIL/GAS COMPANY	GOV'T AGENCY	PAYMENT BY COMPANY (US$)	RECEIPT BY GRA (US$)	DISCREPANCY	RESOLVED	FINAL COMPANY
2	Tullow Ghana Ltd	GNPC	350,000	350,000	-	0	350,000
3	GNPC	PC	300,000	300,000	0	0	300,000
4	Kosmos Investments GH Ltd	PC					
	ENI EXP &PROD LTD	GNPC	200,000	200,000	-	-	200,000
5	ENI EXP &PROD LTD	PC	2,000,000	2,000,000	-	-	2,000,000
	TOTAL		2,850,000	2,850,000	-	-	2,850,000

Source: GHEITI's Construct

Appendix 4F: 2023 Payment Of Training Obligations: Reconciliation Between Companies and GRA.

NO.	OIL/GAS COMPANY	GOV'T AGENCY	PAYMENT BY COMPANY(US$)	RECEIPT BY GRA(US$)	DISCREPANCY	RESOLVED	FINAL COMPANY
1	Kosmos HC	GRA					
2	Tullow Ghana Ltd	GRA	77,725	77,725	-	0	77,725
3	GNPC	GRA			0	0	0
4	Kosmos Investments GH Ltd	GRA					
5	ENI EXP &PROD LTD	GRA	112,010	112,010	-	-	112,010
	TOTAL		**189,735**	**189,735**	**-**	**-**	**189,735**

Source: GHEITI's Construct

Appendix 5 : Project Level

COMPANY	GOVERNMENT ENTITY	REVENUE STREAM NAME	LEVIED ON PROJECT (Y/N)	REPORTED BY PROJECT (Y/N)	PROJECT NAME	REPORTING CURRENCY	REPORTING VALUE
Ghana National Petroleum Corporation	GRA	Carried Interest	Y	Y	Jubilee Fields	US$	251,374,732
Ghana National Petroleum Corporation	GRA	Carried Interest	Y	Y	TEN Fields	US$	36,049,706
Ghana National Petroleum Corporation	GRA	Carried Interest	Y	Y	SGN Fields	US$	55,277,203
Ghana National Petroleum Corporation	GRA	Additional Participating Interest	Y	Y	Jubilee Fields	US$	91,521,518
Ghana National Petroleum Corporation	GRA	Additional Participating Interest	Y	Y	TEN Fields	US$	18,024,853
Ghana National Petroleum Corporation	GRA	Additional Participating Interest	Y	Y	SGN Fields	US$	18,425,734
Ghana National Petroleum Corporation	GRA	Royalty	Y	Y	Jubilee Fields	US$	132,302,539
Ghana National Petroleum Corporation	GRA	Royalty	Y	Y	TEN Fields	US$	18,973,530

COMPANY	GOVERNMENT ENTITY	REVENUE STREAM NAME	LEVIED ON PROJECT (Y/N)	REPORTED BY PROJECT (Y/N)	PROJECT NAME	REPORTING CURRENCY	REPORTING VALUE
Ghana National Petroleum Corporation	GRA	Royalty	Y	Y	SGN Fields	US$	68,332,716
Ghana National Petroleum Corporation	GRA	Surface Rental	Y	N		US$	
Ghana National Petroleum Corporation	GRA	Corporate Tax	N	N		US$	
Ghana National Petroleum Corporation	Petroleum Commission	Training Obligations	Y	N		US$	300,000
Ghana National Petroleum Corporation	Petroleum Commission	Permit Renewal Fees	Y	N		US$	
Tullow Ghana Limited	GRA	Carried Interest	Y	N		US$	
Tullow Ghana Limited	GRA	Additional Participating Interest	Y	N		US$	
Tullow Ghana Limited	GRA	Royalty	Y	Y	Jubilee Fields	US$	
Tullow Ghana Limited	GRA	Royalty	Y	Y	TEN Fields	US$	
Tullow Ghana Limited	GRA	Surface Rental	Y	N		US$	77,725
Tullow Ghana Limited	GRA	Corporate Tax	N	N		US$	157,206,436

COMPANY	GOVERNMENT ENTITY	REVENUE STREAM NAME	LEVIED ON PROJECT (Y/N)	REPORTED BY PROJECT (Y/N)	PROJECT NAME	REPORTING CURRENCY	REPORTING VALUE
Tullow Ghana Limited	Petroleum Commission	Training Obligations	Y	N		US$	350,000
Tullow Ghana Limited	Petroleum Commission	Permit Renewal Fees	N	N		US$	
Kosmos Energy Ghana HC	GRA	Carried Interest	Y	N		US$	
Kosmos Energy Ghana HC	GRA	Additional Participating Interest	Y	N		US$	
Kosmos Energy Ghana HC	GRA	Royalty	Y	Y	Jubilee Fields	US$	
Kosmos Energy Ghana HC	GRA	Royalty	Y	Y	TEN Fields	US$	
Kosmos Energy Ghana HC	GRA	Surface Rental	Y	N		US$	
Kosmos Energy Ghana HC	GRA	Corporate Tax	N	N		US$	76,270,327
Kosmos Energy Ghana HC	Petroleum Commission	Training Obligations	Y	N		US$	
Kosmos Energy Ghana HC	Petroleum Commission	Permit Renewal Fees	N	N		US$	
Eni Ghana Exploration & Production Ltd.	GRA	Carried Interest	Y	N		US$	

COMPANY	GOVERNMENT ENTITY	REVENUE STREAM NAME	LEVIED ON PROJECT (Y/N)	REPORTED BY PROJECT (Y/N)	PROJECT NAME	REPORTING CURRENCY	REPORTING VALUE
Eni Ghana Exploration & Production Ltd.	GRA	Participating Interest	Y	N		US$	
Eni Ghana Exploration & Production Ltd.	GRA	Royalty	Y	Y	SGN Fields	US$	
Eni Ghana Exploration & Production Ltd.	GRA	Surface Rental	Y	N		US$	112010
Eni Ghana Exploration & Production Ltd.	GRA	Corporate Tax	N	N		US$	
Eni Ghana Exploration & Production Ltd.	Petroleum Commission	Training Obligations	Y	N		US$	2,200,000
Eni Ghana Exploration & Production Ltd.	Petroleum Commission	Permit Renewal Fees	N	N		US$	
Vitol	GRA	Carried Interest	Y	N		US$	
Vitol	GRA	Additional Participating Interest	Y	N		US$	
Vitol	GRA	Royalty	Y	Y	SGN Fields	US$	
Vitol	GRA	Surface Rental	Y	N		US$	

COMPANY	GOVERNMENT ENTITY	REVENUE STREAM NAME	LEVIED ON PROJECT (Y/N)	REPORTED BY PROJECT (Y/N)	PROJECT NAME	REPORTING CURRENCY	REPORTING VALUE
Vitol	GRA	Corporate Tax	N	N		US$	
Vitol	Petroleum Commission	Training Obligations	Y	N		US$	
Vitol	Petroleum Commission	Permit Renewal Fees	N	N		US$	
PetroSA Ghana Ltd	GRA	Carried Interest	Y	N		US$	
PetroSA Ghana Ltd	GRA	Additional Participating Interest	Y	N		US$	
PetroSA Ghana Ltd	GRA	Royalty	Y	Y	Jubilee Fields	US$	
PetroSA Ghana Ltd	GRA	Royalty	Y	Y	TEN Fields	US$	
PetroSA Ghana Ltd	GRA	Surface Rental	Y	N		US$	
PetroSA Ghana Ltd	GRA	Corporate Tax	N	N		US$	
PetroSA Ghana Ltd	Petroleum Commission	Training Obligations	Y	N		US$	
PetroSA Ghana Ltd	Petroleum Commission	Permit Renewal Fees	N	N		US$	
Kosmos Energy Ghana Investments Ltd		Carried Interest	Y	N		US$	

COMPANY	GOVERNMENT ENTITY	REVENUE STREAM NAME	LEVIED ON PROJECT (Y/N)	REPORTED BY PROJECT (Y/N)	PROJECT NAME	REPORTING CURRENCY	REPORTING VALUE
Kosmos Energy Ghana Investments Ltd		Additional Participating Interest	Y	N		US$	
Kosmos Energy Ghana Investments Ltd		Royalty	Y	Y		US$	
Kosmos Energy Ghana Investments Ltd		Surface Rental	Y	N		US$	
Kosmos Energy Ghana Investments Ltd		Corporate Tax	N	N		US$	120,962,283.00
Kosmos Energy Ghana Investments Ltd		Training Obligations	Y	N		US$	
Kosmos Energy Ghana Investments Ltd		Permit Renewal Fees	N	N		US$	
Kosmos Energy Ghana Investments Ltd		Surface Rental					
TOTAL							**1,047,761,312**

Source: GHEITI's Construct

Appendix 6: Employment Data

	COMPANY	MALES	FEMALES	TOTAL	% of females
1	ENI Ghana ltd	449	112	561	19.96
2	GNPC	**393**	**201**	594	33.84
3	Kosmos Energy Ghana HC	10	5	15	33.3
4	Kosmos Energy Ghana Investments				
5	Tullow	202	54	256	21.09
	Total				