



# Joint Monitoring and Review Mechanism of the Ghana-EU FLEGT Voluntary Partnership Agreement

## Aide Memoire

**Eleventh Session of the Joint Monitoring and Review Mechanism**  
Brussels, 20<sup>th</sup>-26<sup>th</sup> September 2023

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### Introduction

1. The eleventh session of the Joint Monitoring and Review Mechanism<sup>1</sup> (JMRM) to facilitate the implementation of the Forest Law Enforcement Governance and Trade (FLEGT) Voluntary Partnership Agreement (VPA) between Ghana and the European Union (EU) took place in Brussels from the 20<sup>th</sup> to 26<sup>th</sup> September 2023. The session was co-chaired by Ghana and the EU. The Ghana Delegation was led by the Honourable Samuel A. Jinapor, MP, Minister for Lands and Natural Resources. The EU Delegation was led by His Excellency, Irchad Razaaly, Head of the EU Delegation to Ghana.
2. The Ghana team included representation from the Ministry of Lands and Natural Resources (MLNR), the Forestry Commission (FC), Civil Society and the Private Sector. The EU team included representation from the EU Delegation to Ghana (EUD) and the European Commission's Directorate General for International Partnerships (DG INTPA). Representatives of the European Forest Institute's (EFI) VPA Africa and Latin America Facility and Ghana's FLEGT Facilitator were also in attendance. A list of participants is attached as Annex I to this aide memoire.
3. This session of the JMRM was the first since May 2019. It was also the first meeting of the JMRM to be convened outside of Ghana. The agenda for the meeting focussed on progress made in the VPA process since the last meeting of the JMRM. The following sections provide a summary of the discussions held on each of the items on the agenda.

### Formal adoption of the VPA annex amendments

4. In 2018, the then Minister for Lands and Natural Resources, submitted a proposal to the EUD to amend four of the annexes to the VPA. The nature of the amendments made were an expansion of the scope of products covered by the licensing system (Annex I), an updating of the legality definition (Annex II) to reflect legal reforms that had been undertaken since the agreement entered into force, changes to the format of the FLEGT license (Annex IV) and improvements that had been made to the Legality Assurance System that needed to be reflected in the description of the system as contained in the relevant VPA annex (Annex V).

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<sup>1</sup> The purpose of the JMRM is described in Article 19 of the VPA

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5. The proposed amendments were drafted following a national stakeholder consultation process and were discussed with the EU in successive meetings of the JMRM between 2015 and 2019. At the end of 2019, the EU approved the amendments proposed by Ghana. In accordance with Article 26 of the VPA, and the rules of procedure for the JMRM, the final step in this process is a formal adoption of the amendments. This requires that a decision of the JMRM to adopt these amendments is co-signed by the Minister and the EU Ambassador as co-Chairs of the JMRM. A signed copy of this decision is included as Annex 2 to this aide memoire.

### **Joint Action Plan towards FLEGT licensing**

6. Following the conclusion of the independent joint assessment of Ghana's Legality Assurance System in December 2020, Ghana developed an action plan to address the findings of the assessment. The approach used in the development of this action plan was to categorise the findings and related actions into those that would need to be dealt with prior to licensing and those that could be dealt with post-licensing.
7. The progress reported in addressing issues identified in the action plan, included the completion of forest management plans for all timber production reserves, the submission of extant leases and permits to Parliament for ratification (see paragraphs 25-27 for further details), and the issuance of a Ministerial directive in May 2021 to strengthen regulatory controls.<sup>2</sup> The full implementation of this Directive will effectively address concerns related to the entry of non-compliant material into the GhLAS, and the issuance of export permits for material that the system has flagged as non-compliant. It also clarifies that any non-converted permits will be considered non-compliant.
8. Ghana clarified that although the directive was already in place, until such time as the conversion of extant leases and permits has been completed by Parliament, they could not prevent material from these sources being traded as this would be holding the private sector accountable for an action that is the responsibility of Government. As soon as there is confirmation that the ratification of the first batch of leases and permits has been completed, a clear timeline for the full implementation of this directive will be established and communicated.
9. The need for effective implementation of any corrective action requests (CARs) for non-compliances detected by the Timber Validation Department (TVD), Independent Monitor or other bodies was a further concern highlighted in the independent assessment of the GhLAS. To address this, Ghana has instituted a process whereby a technical report is prepared by the Forestry Commission to the Audit Committee of the FC for review and onward transmission to the Public Accounts Committee of Parliament. This reporting requirement has greatly increased the transparency surrounding CARs and accountability for their effective resolution.

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<sup>2</sup> 'Permits' in this context refers to rights issued for the exploitation of natural forest not ratified by Parliament, excluding Salvage Permits and Timber Utilisation Permits.

10. During this session, Ghana also confirmed that the ban placed by the Minister in July 2021 on the harvesting, transportation, processing, and export of Rosewood was still in force. In support of the ban, a Ministerial directive had also been issued that any confiscated Rosewood be donated to remove any market incentive for continued harvesting.
11. The FC has undertaken an inventory of Rosewood stocks to establish harvesting quotas for the regulation of Rosewood harvesting based on Non-Detriment Findings (NDF), and have already made a submission to the CITES Secretariat for consideration.
12. In conclusion, the action plan was formally agreed by the Parties to be a joint action plan to FLEGT licensing and as such, has been attached as Annex 3 to this aide memoire.

### **EU Deforestation Regulation (EUDR)**

13. With the entry into force of the EU Deforestation Regulation in June 2023 being a significant market development since the last meeting of the JMRM, the EU offered to share information on the rationale for and requirements of the regulation. They stated that the primary objective of the EUDR is to reduce deforestation and forest degradation that is driven by the production of agricultural commodities consumed in the EU.
14. Similar to the EU Timber Regulation (EUTR), the EUDR is based on a mandatory due diligence system, that requires that products within the scope of the regulation, that are placed on the EU market, be produced in accordance with the relevant legislation of the country of origin. The due diligence system for these products involves the gathering of information, an assessment of risk and the implementation of measures to mitigate any risks identified.
15. Another pillar of the regulation is the benchmarking that will be undertaken for each country. The European Commission is developing a methodology for benchmarking of countries in the coming months, with a view to completing that before the end of March 2024. The final benchmarking will also be informed by a dialogue with producer countries on the rationale for the proposed level of risk for each country.
16. It was clarified that FLEGT licenses meet all requirements under the EUDR for evidence of legality. Ghana also informed that the functionality of its Legality Assurance System includes the ability to reference the geo-location of harvesting, which may provide a useful contribution to meeting the additional requirements under the EUDR of demonstrating that the timber harvested has not resulted in deforestation or forest degradation.
17. In response to the presentation on the EUDR, Ghana expressed a number of concerns related to the information provided. These included:
  - Lack of clarity as to the methodology for the benchmarking exercise, how this exercise would be undertaken and by whom.
  - The exclusion of mining as a driver of deforestation, given the impact that this landuse has on forests in Ghana and elsewhere. This concern was further reinforced during the open session with civil society (see paragraph 56).

- The apparent confusion that was evident in the meeting with members of the European private sector earlier in the week and the impact that such lack of preparedness might have on timber trade with the EU. In this regard, Ghana called for the EU to urgently convene another forum where greater clarity could be provided on implementation requirements for both exporters and importers.
18. In response, the EU committed to relay these concerns to the relevant services within the Commission and informed Ghana that the process of developing implementation guidelines for the regulation, was currently underway and may be presented in the context of a multi-stakeholder platform established for the EUDR, that includes representation from a number of countries. The EU also reflected that many of the concerns raised had already been communicated in a letter to the European Commission, signed by 17 countries and that Ghana had been a signatory to this communication. A formal EU response to this communication is pending.

### **Independent Monitor**

19. The independent third-party audit of Ghana's Legality Assurance System is undertaken by an Independent Monitor (IM). The terms of reference for the role of the IM are set out in Annex VI of the VPA. Although this is a function linked to FLEGT licensing, Ghana has had an operational IM since May 2014 and has used the findings of their audit reports to guide the strengthening of the system.
20. It is a requirement of the VPA that audit summary reports be published once they have been approved by the JMRM. Since the publication of the last audit summary report in 2018, Ghana confirmed that the contract with the IM was renewed in 2020. Under this new contract, the IM has carried out audits covering the period August 2020 to August 2021, and August 2021 to August 2022. Ghana will share the audit reports with the JMRM for discussion and subsequent publication of the summary reports by the JMRM.
21. Ghana advised that the current IM contract is due to expire in August 2024 and that assuming the implementation of FLEGT licensing is possible around that time, there would be sufficient funds remaining within the existing contract to allow for another audit prior to licensing. On future financing of this audit function, Ghana indicated that it would welcome a discussion with the EU as to what resources they might be able to make available in that regard (see paragraphs 63-65).
22. Beyond the current contract however, Ghana is keen to explore alternative arrangements for meeting this obligation for third-party audits. Given the requirement for the TVD to report to Parliament through the FC Audit Committee, and the fact that the findings of the IM are essentially the same as those identified by TVD, Ghana is of the view that there is little added value in having this additional audit function performed by the IM. Such alternatives may include the contracting of a Ghana-based firm to reduce cost, and a move to multi-annual audits that would meet the requirements of periodic audits but not necessarily on an annual basis. Any review of this role will need to be mindful of the provisions for the IM as set out in annexes V and VI of the VPA.

## **Confiscated Timber**

23. The European Union (EU) has raised a concern on confiscated timber in relation to the inclusion of Ghana in Annex I of the EU FLEGT Regulation No2173/2005. In this context the Parties acknowledge that:
- They have concluded a Voluntary Partnership Agreement which contains legal obligations applicable to the Parties;
  - In Ghana, a ban on the harvesting, transport, processing, and export of Rosewood has been in force since 2021. In support of the ban, a Ministerial directive had also been issued that any confiscated Rosewood be donated to remove any market incentive for continued harvesting;
  - Confiscation is included in the European Union Deforestation Regulation (EUDR) as an enforcement and penalty measure, that is directly applicable to the EU Member States and must be complied with fully by those to whom it applies but no provision allows the placing on the market of confiscated timber;
  - Confiscation continues to be used as a penalty and enforcement measure by some EU Member States.
24. In the spirit of cooperation and reciprocity:
- The Commission commits that it will not make its concern related to the placing on the Union market of confiscated timber under the VPA a conditionality for approving/starting licensing of timber and timber products from Ghana without prejudice to the right to address any violation of the VPA and the EU FLEGT Regulation No2173/2005;
  - Ghana commits not to export confiscated timber to the EU market as of the entry into application of the EUDR on wood and wood products.

## **Conversion of extant leases and permits**

25. Of the issues identified by the independent assessment of the GhLAS as requiring attention prior to licensing, the conversion of extant leases and permits, is the only issue yet to be fully resolved. Ghana confirmed that a submission of extant leases and permits had been made to Parliament earlier this year, and that the Parliamentary Select Committee on Lands and Forestry had completed their review and prepared a report recommending their ratification. This report will be laid before the plenary session of Parliament once it resumes after recess in October 2023. Assuming that a decision is taken to ratify these leases and permits, evidence that this ratification process has been completed will be available through the publication of parliamentary proceedings in the Hansard.
26. Although there are still representatives of the private sector who are yet to complete their applications to have their leases and/or permits ratified, a total of 156, representing the majority of those requiring conversion, have already been submitted to the Minister for approval. Following Ministerial approval, leases and permits must be submitted to Parliament for ratification.

27. Ghana clarified that once those who have applied for conversion have had their leases and permits ratified by Parliament, the Ministerial directive on non-converted leases and permits will be enforced. Information clarifying the timeline for the cancellation of these permits will be clearly communicated to the private sector once the conversion of all those that have been submitted for ratification has been completed.

## **GhLAS update**

28. As a summary overview of the progress made in the development of its Legality Assurance System, Ghana shared that the institutions required to support the effective functioning of the system were fully operational, with their mandates taken from the Timber Resource Management and Legality Licensing Regulation (LI2254) passed in 2017.
29. Ghana also emphasised that the system that had been built to verify the legality of timber being exported to the EU, applied the same requirements for legal compliance to timber being exported to all other international markets and to the domestic market.
30. To illustrate the evolution of the electronic wood tracking system that Ghana had begun working on in 2010 into the decision-making support system that it currently represents, Ghana gave a live demonstration of the scope and functionality of the system. Ghana explained that the current service provider is the third that they have contracted, and that with each service provider they have been able to further enhance the functionality of the system. While this system meets the requirements of the LAS as set out in Annex V of the VPA, it further provides summary data that can be used to inform decision-making on forest management and data analysis that can inform policy development.
31. The nature of information that can be viewed in summary dashboard format, includes the volumes being harvested by region, the volumes being harvested according to permit type, the relative market share for Ghana's timber exports, and the number of tree information forms that have not been invoiced. The real-time functionality of the system allows for reconciliation of data that immediately highlight discrepancies and generate red flags in the system, which will prevent the issuance of export permits and FLEGT licenses unless cleared. The system has the capability to demonstrate traceability back to the location of harvest.
32. The GhLAS also enables the findings of the TVD audits to be uploaded into the system, with any observations and non-conformances recorded. TVD auditors, each of whom is ISO certified and Forest Stewardship Council (FSC) chain-of-custody and forest management certified, enters their name, any corrective action requests issued, and the date by which these should be resolved in the system. These findings inform the decision-making process of the Licensing Authority, who will not issue an export permit or FLEGT license if there is an unresolved CAR.
33. Beyond the interface for the staff of the Forestry Commission, the system also has a public portal, that allows the general public to access certain information contained in the system, as well as a private sector portal. The private sector portal enables each operator to both upload information and view any red flags that might be associated with their consignments

so that they can work to clear those as efficiently as possible. A portal for EU competent authorities has also been developed (see paragraphs 39-43).

34. Despite the progress made, the FC acknowledged that challenges with internet coverage across the country and a shortage of field equipment for FC staff could sometimes lead to delays in data capture. To mitigate the connectivity issue, the system allows data to be collected and entered while off-line and then uploaded when an internet connection is established.
35. Given the scope of Ghana's legality definition to include laws that address both environmental and social concerns, and the ability of the system to trace timber back to geo-locations, Ghana asserted that the system provided a strong basis for being able to meet many of the requirements for additional information that would be placed on operators under the EUDR.

### **VPA impacts – Evidence Gathering**

36. In 2019 and 2021, Aide à la Décision Économique (ADE) and the Centre for International Forestry Research (CIFOR) carried out a study financed by the FAO EU FLEGT Programme to collect evidence of VPA outcomes and impacts. This session provided an opportunity for the findings of the Ghana country study to be shared with the Parties. The Ghana study was carried out in collaboration with the Nature and Development Foundation (NDF) as a local partner.<sup>3</sup>
37. The study sought to capture a potential change for a range of indicators for the period before the VPA process started and the time of the evaluation. It also sought to establish whether the VPA might have contributed to any changes observed. To inform the review in Ghana, which was essentially a perceptions study, the team met with forest sector experts and interviewed a total of 137 individuals from across Government, the private sector, CSOs and academia.
38. A key finding of the study was that *“the implementation of the VPA has resulted in better implementation of forest regulations and more sustainable forest practices”*. In conclusion, the team found that while change might be slow, it was enduring, and was moving things like sector governance that are difficult to move. In this regard, the researchers noted that it is important to acknowledge the complexity of such a process and how difficult it can be to have immediate impact. Emphasis was also given to the need for Ghana to gather and communicate evidence of impacts.

### **FLEGT portal**

39. The objective of the FLEGT portal is to reduce the need for interaction between Ghana's Licensing Authority and the Competent Authorities (CA) of the EU Member States, by

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<sup>3</sup> The Ghana country study report is available to download: [Collecting evidence of FLEGT-VPA impacts: Ghana country report - FLEGT Voluntary Partnership Agreement Library \(cifor.org\)](https://www.cifor.org/publications/collecting-evidence-of-flegt-vpa-impacts-ghana-country-report)

providing them with direct access to information so that they can be confident in the authenticity, validity, and accuracy of the licenses they are receiving from Ghana.

40. Ghana provided a demonstration of the FLEGT portal that will go live once the licensing system is operational. The main users of the portal will be the Timber Industry Development Division (TIDD) of the FC as the Licensing Authority for Ghana, and the FLEGT CA of the EU Member States.
41. The functionality of the system allows the CA to register a query against any FLEGT license issued. To facilitate an efficient handling of such queries, the FC has anticipated a list of frequent questions so that these can be managed under certain thematic areas. The FC has also included a 'Frequently Asked Questions' page to be accessed as a first resort.
42. On the CA page, Ghana has included a search hub where a CA can search for a license that they are holding and require more information on. Once they have entered their query on the system, and the Licensing Authority has provided a response, the CA can choose to either mark this query as resolved or unresolved. Each time a query is raised, a prompt is automatically sent to the Licensing Authority to ensure that queries are dealt with in a timely manner. As FLEGT licenses attest to full compliance with the legality definition as set out in the VPA, any queries raised are confined to the authenticity, validity, and accuracy of the license and not to the legality of the timber.
43. Reflecting on concerns that had previously been raised by Member States, it was agreed that it would be important to always use the scientific name on the FLEGT license to avoid the risk of confusion.

### **Domestic Market Update**

44. During VPA negotiations, Ghana included the domestic market within the scope of the agreement given the important role that it played, not just economically but also from a governance and sustainable forest management perspective. Starting with the development of a domestic market policy in 2012, Ghana has implemented a number of measures aimed at increasing the supply of legal timber to the domestic market.
45. In a presentation made by Ghana, it was stated that an estimated 75% of lumber production in Ghana currently goes to the domestic market and that given the significance of this market share, the FC had been pursuing several strategies.
46. To address the concern of limited supply of verified legal timber on the domestic market, a Domestic Timber Trade Network (DOTTNET) portal has been developed. The plan is that this portal will link up with the GhLAS and, among other things, will enable large scale operators with access to verified legal timber that they do not have a market for, to link up with smaller scale operators interested in buying that material.
47. To promote demand for verified legal timber domestically, the FC has worked closely with the private sector and CSOs to engage the Public Procurement Authority (PPA), who already have a provision in their Act, requiring the implementation of sustainable procurement policies. To enable the expansion of this to cover timber procurement, the FC



has developed documents that can be used to support the tendering of government projects to specify the use of verified legal timber in such contracts. The format of the certificate required to verify the legality of timber for the domestic market has now been endorsed by the FC. Once the PPA has been notified of this by the FC Chief Executive through the MLNR, the implementation of this procurement measure will take effect.

48. Beyond these measures, the FC is also exploring the feasibility of establishing legal timber depots at various locations across Ghana, to facilitate market access to verified legal timber for both government-financed contracts and private contractors.

### **Complaints Mechanism**

49. The Timber Resource and Legality Licensing Regulation (LI2254), sets out the functions of the Timber Validation Committee (TVC), which is the body established to provide oversight of the functioning of the Timber Validation Department. The TVC also has the mandate to deal with complaints from operators, civil society and members of the general public. In close consultation with the Taylor Crabbe Initiative and the members of Ghana's legal working group, the FC has developed a complaints mechanism for the TVC.
50. The type of complaints envisaged under this mechanism are those that relate to system integrity, or to the policies and procedures that underpin the system. They can be filed by an operator, a representative of civil society, or a private individual. Complaints can also be filed by whistleblowers, however the TVC will need to determine whether such complaints have been filed with adequate evidence to enable their full consideration.
51. To file a complaint, the complainant must complete a detailed Complaints Form within six months of the event or action that is the focus of the complaint. Depending on the complexity of the complaint, a response should be issued within 7 working days. For more complex complaints that necessitate an investigation, the TVC would communicate with the complainant to determine a realistic timeframe within which the complaint could be handled.

### **Stakeholder Session**

52. This open stakeholder session was facilitated by Fern. The concerns raised by representatives of civil society during the meeting are captured in the following paragraphs.
53. On delays to licensing, frustration was expressed with the introduction by the European Commission in 2022, of confiscated timber as an issue to be resolved prior to licensing, particularly given the negligible volumes being traded. Concerns were also expressed in relation to the delays on the Ghana side in progressing the conversion of extant leases and permits into ratified TUCs. Stakeholders were provided with an update on progress to date with both issues and given assurances that the Parties acknowledged the progress that had been made, and were committed to using this meeting of the JMRM to address any final impediments to licensing.

54. On efforts to communicate the value of FLEGT licenses, the EU acknowledged that more could be done in this regard to explain that the legality definition also addresses environmental and social principles. They reflected that with the introduction of the EUDR comes an opportunity for a different narrative for VPAs that could speak to the achievements of VPAs more broadly. It was agreed that there was a role for CSOs in supporting the development and communication of such messaging and that it was important for the impact monitoring framework being developed jointly by the Parties to provide evidence to support such communication efforts.
55. The EU also clarified that measures like the introduction of public procurement policies was a Member State competence, but that they hoped to be able to influence EU demand for FLEGT licensed timber through country programmes by investing in the development of value chains that would improve access to new markets for Ghana's timber exports. The EU's 'Green Deal' also provides opportunities to explore trade in sustainable timber as a green material.
56. CSOs also used the opportunity of this session to reiterate their concerns on the exclusion of mining as a driver of deforestation in the scope of the EUDR. In response the EU acknowledged that while the mining sector had been excluded, the EUDR was not the only instrument available to tackle this issue, and that it was important to also use Nationally Determined Contributions and other processes.
57. On the question of financial support to VPA processes, concern was expressed that without adequate support, the vital role played by CSOs in the VPA process would be seriously undermined. In response, the EU shared information on the various mechanisms through which they were able to mobilise funds in support of Ghana's VPA (see paragraphs 63-65). Ghana also reflected that given the value that CSOs had brought to the process, it would be important to consider how to sustain this level of engagement from sources of funding other than development partners.
58. On the role played by CSOs in the implementation of the VPA, a representative of Ghana government acknowledged the importance of and need for continued active engagement of national NGOs as watchdogs of the sector. A representative of the Ghana private sector also expressed appreciation for the role that CSOs were keen to play in supporting the promotion of FLEGT-licensed timber. In this regard, Fern also confirmed that once national NGOs were supportive of the FLEGT license being issued, European NGOs would take their cue from them and be equally supportive, despite some being more familiar with, and therefore likely to advocate for, voluntary certification schemes.

## **Annual report**

59. Article 20 of the VPA requires that the JMRRM make public an annual report. The last report published was in 2017. A draft of the 2018 report has already been prepared and can be shared with the Parties for review, with an aim to finalise this by mid-October. The final validation of the report can be completed through a written communication, rather than waiting for another meeting of the JMRRM.

60. To bring reporting up to date, it was agreed that the preparation of the next report would be led by EFI, covering the period 2019 to 2023 and would be published before the end of the first quarter of 2024. An outline for the table of contents of this report will be drawn from the structure of reports that has been agreed previously and will be shared with stakeholders to seek the relevant inputs. A zero draft of the report will be ready for review by early January 2024.

### **Remaining steps to FLEGT licensing**

61. Given the consensus reached on how to deal with the EU's concerns on confiscated timber (paragraphs 23-24), the only issue to be resolved prior to licensing is the ratification by Parliament of extant leases and permits. It was agreed that once evidence of the ratification was available, including through the Parliamentary Hansard, Ghana would determine the timeframe within which all non-compliant material would be prevented from entering the GhLAS and prevented from obtaining an export permit and/or FLEGT license if flagged as non-compliant once in the system.
62. In accordance with Article 12 of the VPA, it is on the basis of the recommendations of the JMRM that the Parties agree on a date from which the FLEGT Licensing Scheme should start full operation. Given this requirement, it was agreed that a further meeting of the JMRM should be convened to make such a recommendation within two months of the Parliamentary ratification of the first batch of extant leases and permits.

### **Financing for VPA implementation**

63. The EU set out the funding mechanisms managed both centrally and at the EUD level, to mobilise support to VPA implementation processes. At the central level, the funds available have been delegated to Agence Française de Développement (AFD) to run a programme similar to the FAO EU FLEGT programme. Within this support is a provision of approximately €1.5m, which is available until the end of 2025. A clear statement of support needs from Ghana will be required to mobilise these funds.
64. In-country, under the EUD's joint programming for the period 2021-2027, is an annual action plan for 2023, within which there is provision for support to agribusiness and the forest sector more broadly. Funds to support VPA implementation can be mobilised through mechanisms that are managed by both the FAO and EFI. Although these funds had been foreseen as targeting civil society, the EUD remain open to discussing support priorities with Government.
65. It was agreed that to enable the most effective use of the resources available, it would be important for Ghana to determine a full range of support needs and to prioritise within that so that discussions could be held with the EU as to how to best allocate resources within the funding envelope available.

**Date of the next JMRR**

66. In anticipation of the conversion of the first batch of extant leases and permits being completed by the end of 2023, it was agreed to tentatively schedule a formal meeting of the JMRR for early February 2024.

Signed: \_\_\_\_\_

Hon. Samuel A. Jinapor, MP  
Minister of Lands and Natural Resources

Date: \_\_\_\_\_

Signed: \_\_\_\_\_

His Excellency Irchad Razaaly  
Ambassador of the EU to Ghana

Date: \_\_\_\_\_