Internalising corporate social responsibility (CSR) in ASM: The making of small-scale miners as environmental and work safety 'champions'

Abstract

Purpose

While the practice of CSR in the mining sector is far from a new occurrence, far less common is an examination of the CSR-related activities of artisanal and small-scale mining (ASM) firms. Drawing on Carroll (1991) four-part model of CSR as a lens, we explore the discursive construction of some socio-environmentally oriented activities of a small-scale mining operator to extend our understanding of CSR in practice

Design/methodology

This study employs a qualitative research design involving semi-structured interviews with the management and staff of a small-scale mining company located in the Eastern region of Ghana.

Findings

The findings suggest small-scale mining operators, contrary to the dominant narrative of being inattentive to CSR concerns, could strategically leverage salient environmental management practices and novel worker safety procedures to make them unanticipated champions of CSR.

Originality/value

The study extends our understanding of how salient organizing practices of small-scale mining firms may cohere to give shape and form to the practice of CSR in context.

Introduction

The discovery, extraction, and processing of mineral resources, widely regarded as one of the most environmentally and socially disruptive activities undertaken by humankind, continues to come under widespread and increasing criticism in some policy circles (Clifford, 2022; Jenkins, 2004; Peck and Sinding, 2003). According to Weber-Fahr (2002), the mining industry leaves behind a 'footprint' – an environmental, social, and economic impact – and it is therefore fittingly described as a 'footprint industry'. Hence, most economists and environmentalist have tended to challenge economic models that base development on the extraction of non-renewable natural resources (Ross, 2001a, 2001b).

Notwithstanding the opposition to the operations of the mining industry, however, the industry, largely aided by neoliberal mining reforms, continues to witness unprecedented access to new mineral-rich regions for mineral exploration (Hilson, 2019; Sauerwein, 2020). In this regard, despite the environmental concerns, cost benefit analysis is sometimes employed to justify the expansion because it is thought that the environmental problems are often outweighed by the broader financial incentives (Jenkins, 2004). Indeed, revenues accruing from the industry, which typically accrue largely to the public sector and to the public finances, have been known to help remove huge barriers to development, particularly the lack of financial resources needed to fuel the provision of basic public goods (Sachs, 2007).

In addition, the extraction and production of mineral resources, such as gold, for example, are known to serve as avenues of employment for many people especially in mineral-rich areas (Arthur-Holmes and Abrefa Busia, 2022a; Langston et al., 2015; Ofosu et al., 2020; Ofosu and Sarpong, 2022). The extractive sector create local employment and economic multipliers, although to different degrees in different places (Kemp and Owen, 2019) with large-scale mines employing significant numbers of people in formalised jobs, as well as providing better job security and safer working conditions for employees (Langston et al., 2015). Complementarily, although artisanal and small-scale mining (ASM) operations are largely informal, with consequential environmentally-destructive effects (Asare et al., 2022; Damptey et al., 2020; Kitula, 2006; Ofosu et al., 2020), they are known to have broader distributional effects (Hilson and Banchirigah, 2009; Hilson and Garforth, 2012). As formal barriers for entry are lower for accessing ASM work opportunities, a larger proportion of women and younger

people tend to be engaged in the sector (Arthur-Holmes and Abrefa Busia, 2022a; Ofosu et al., 2024a; Yakovleva, 2007).

Contrary to popular perception, the extractive industry has not entirely neglected the problematic representations of its operations on the environment. Although social and environmental responsibility has not always been high on the sustainability agenda of, particularly, the ASM sector, most of the operators in the large-scale segment of the industry continue to respond to the socio-environmental quagmire by developing environmental and community-friendly mechanisms (Dauda, 2024; Kapelus, 2002). Principal among these mechanisms is the development of global corporate social responsibility (CSR) strategies as part of their broader global business strategies (Ackah-Baidoo, 2012; Cory, 2024; Dauda, 2024; Stutz, 2021).

Various studies have examined, for example, the voluminous concepts, dynamic definitions, and ramifications of CSR (Banks et al., 2016; Bester, 2022; Bester and Groenewald, 2021; Carroll, 2008; Dobele et al., 2014; Kemp, 2010; Lopatta et al., 2016; Trebeck, 2008). According to Vintró and Comajuncosa (2010), CSR may be defined as a comprehensive business model designed to meet the requirements and expectations of the various stakeholders in a company, as well as to care for and protect the environment. CSR is often framed as an altruistic activity which business entities undertake at the local level mainly as a mechanism to advance social well-being through performing activities that promote especially environmental, ethical, and sustainable procurement (Crane et al., 2008). For the extractive sector specifically, CSR is portrayed as a way of balancing the different demands of local mining communities and the imperative to safeguard the physical environment with the ever-present need to make a profit (Jenkins, 2004; Ofosu and Sarpong, 2023). According to the Commission of the European Communities, CSR is the concept that an enterprise is accountable for its impact on all relevant stakeholders; it is the continuing commitment by businesses to behave fairly and responsibly and contribute to economic development while improving the quality of life of the workforce and their families as well as the local community and society at large. In general, CSR has primarily been understood as policies and practices that business people employ to be sure that stakeholders, other than business owners, are considered and protected in their strategies and operations (Carroll, 2016). Some definitions of CSR have argued that an action must be

purely voluntary (philanthropic) to be considered socially responsible; others have argued that it embraces legal compliance as well; still others have argued that ethics is a part of CSR (Carroll, 2016).

In the midst of the plethora of definitions and theoretical dimensions associated with CSR, Carroll (1991), in an attempt to provide some clarity and offer an 'understanding' of what constitutes CSR, explicates on a four-part model of CSR i.e. 'economic', 'legal', 'ethical', and 'philanthropic' responsibilities. Summarily this model explains to the extent that CSR activities go beyond 'philanthropic' responsibilities of business operations. Importantly, CSR mechanisms also encapsulate the 'legal' and 'ethical' responsibilities of business entities, and that CSR is also about adherence to the legal and ethical regulatory framework associated with any business operation. Legal and ethical responsibilities can therefore be seen as the set of practices and behaviours, sanctioned by the law, that firms adopt towards the environment in which their operations are embedded, and towards their labour force (Carroll, 2016, 1991; Crane and Matten, 2016). Considering the case of the small-scale mining industry, for example, legal and ethical responsibilities means mining operators' adherence to the mining code. In this case adherence to the mining code entails, for example, comprehensive strategies to remediate/restore mined lands, acquire the necessary legal mining permits etc. Mining operators also have responsibility to cater for workers' welfare (occupational health and safety, proper remuneration, and job security, etc.).

Thus, employing Carroll's model as the guiding principle, with a specific focus on the 'legal' and 'ethical' dimensions, this paper examines the CSR-related activities of a small-scale mining company in Ghana – a country renowned for its vibrancy of extractive activities (Akabzaa and Darimani, 2001; Hilson, 2002), providing a context rich in different mining scales and variations to contextualise and situate our study. The findings illustrate the environmentally 'cleaner' production strategies of the company. We found that the company undertakes a range of 'legal' and 'ethical' CSR activities which cover some of the aspects of issues of 'society and the environment'. Two advantages arise from our use of Carroll's model. First it provided us with a useful tool for analysing the specific societal expectations faced by our case organisation. In other words, Carroll's model created a foundation or infrastructure that helped us to delineate and to characterize the nature of the small-scale

miners' responsibilities to the society of which it is a part. Second it provided us with a useful framework enabling a more refined and comprehensive analysis of relevant social responsibilities.

Bringing the CSR strategies of the mining company to the fore, our study seeks, primarily, to note that, contrary to the dominant narrative, some small-scale mining companies can also be 'champions' of the legal and ethical dimensions of CSR through environmental management practices and worker safety mechanisms. Explicating the CSR practices of small-scale mining operations is important, considering that the negative image of the small-scale mining sector – often generated by the informal, and the related environmentally-destructive mining practices of most of the operators – continues to overshadow the sectors contribution to livelihoods, and its positive socio-economic impacts more generally. The negative image serves as an impediment to positive change in policy and practice (Ofosu and Sarpong, 2022, Zavala, 2017).

Also, the importance of this study is underscored by the fact that the extensive focus of CSR in large companies, and on the 'philanthropic' dimension, has meant that our understanding, generally, of how small and medium sized enterprises implement 'legal' and 'ethical' CSR mechanisms in their operations has remained incomplete, see for example (Demuijnck and Ngnodjom, 2013; Jenkins, 2006; Ofosu and Sarpong, 2023; Redmond et al., 2008). Notwithstanding the fact that the operations of small businesses, as a collective, can contribute significantly to the environmental footprint of society (Redmond et al., 2008), there is relatively minimal research on whether small-scale businesses in general, and small-scale miners in particular practise CSR to minimise their negative effects and contribute towards sustainable development in local communities.

While CSR in the large-scale mining sector has been investigated (Jackson et al., 2023; Ribeiro-Duthie et al., 2017), the dominant assumption is that small-scale miners are devoid of responsibilities, and there is little to no attention to the potential socio-environmental responsibilities of small-scale mining operators in developing countries (Vazquez-Brust et al., 2024). Hence making mining governance regimes and the scholarly public aware of the existence of CSR-responsible small-scale mining operations can help harness the scholarly and policy support small-scale mining needs to attract investments (Zavala, 2017, Ofosu and

Sarpong, 2022). Equally importantly, a prime motivator for undertaking this study is to inform discussions about how to replicate good CSR practices elsewhere in other small-scale mining sites and the implications for mining development.

The concept, definitions and dynamics of CSR

CSR as a concept and practice has mainly been open to varied interpretations by different people (Caulfield and Lynn, 2022; Crane et al., 2013; Matten and Moon, 2020; Mitnick et al., 2021; Schrempf-Stirling et al., 2016; Zaman et al., 2022). As a practice, for example, it can mean different things to practitioners seeking to implement CSR inside companies and, as a theory, a different thing to, for example, researchers trying to establish CSR as a discipline (Blowfield and Frynas, 2005; Crane and Matten, 2007; Orlitzky et al., 2011; Stutz, 2021). As both a theory and a practice, for example, it can also mean different things to NGOs. Despite these differences in interpretation, a key distinguishing feature of CSR is the voluntary nature of the initiatives companies undertake in its name, in contrast to the long-held formal regulatory regimes used to govern business entities (Blowfield and Frynas, 2005; Crane et al., 2013).

CSR is the concept that business entities are accountable for their impact on all relevant stakeholders (Carroll and Shabana, 2010; Scherer and Palazzo, 2007). It is the continuing commitment by businesses to behave fairly and responsibly and contribute to socio-economic development while improving the quality of life of the workforce and their families as well as the local spaces in which they operate and society at large (Commission of the European Communities, 2003; Dahlsrud, 2008; Frederick, 2016; Jenkins and Yakovleva, 2006; Mutti et al., 2012; Yakovleva and Vazquez-Brust, 2012). According to Frederick (2016), CSR occurs when a business firm, through the decisions and policies of its executive leaders, consciously and deliberately acts to enhance the social well-being of those whose lives are affected by the firm's economic operations. In broader terms, CSR provides guidance on how companies make decisions and provide direction for all stakeholders (Crane et al., 2008; Van Marrewijk, 2003). Meanwhile, Wheeler et al. (2002) viewed CSR as a helpful conceptual framework for exploring the corporate attitude of companies towards stakeholders.

Issues regarding the physical and working environment, product quality, and ethics are some of the aspects that are incorporated into CSR management (Vintró and Comajuncosa, 2010). Accordingly, CSR demands that a company respond not only to its shareholders but also to

other stakeholders, including employees, customers, affected communities, and the general public, on issues such as human rights, employee welfare, and climate change (Hamann, 2003). As a result, the main phases of any corporate strategy may be defined from two main standpoints: internal and external responsibility (Vintró and Comajuncosa, 2010). Internal responsibility is mainly concerned with issues related to workers' welfare (occupational health and safety, proper remuneration, and job security, etc.), and to the profitability and economic welfare of shareholders (Vintró and Comajuncosa, 2010). Meanwhile, external responsibility connects the company with suppliers, governments, and society, and includes aspects that highlight respect for natural surroundings (responsible and sustainable exploitation of mineral resources, and conservation of ecosystems), and the establishment of fruitful relations with the community (integration into related social groups and promotion of the local economy) (Vintró and Comajuncosa, 2010).

For a business case, CSR practices are regarded as helping to bring social legitimacy and social recognition for business entities, thus providing social licences to operate (Carroll and Shabana, 2010; Kurucz et al., 2008). CSR activities may yield a number of benefits for a business operation including improved brand reputation and value and a boost in employee morale, retention, and motivation (Dahlsrud, 2008). CSR programmes can also be seen as responses to 'governance gaps' in developing countries especially at the local community level where the private sector takes on the role of providing public goods and coordination in cases where state support has not been forthcoming (Blowfield and Frynas, 2005; Visser, 2008).

Despite the increasing recognition of the importance of CSR initiatives, however, it has been argued that there are still important gaps between mining companies' CSR activities on the one hand and accountability and fairness on the other (Banerjee et al., 2023; Heugens and van Oosterhout, 2008; Hilson et al., 2019; The Economist, 2005). Evidence has been provided to the effect that, in some instances, sharp contradictions exist between stated CSR commitments and actual performance (Slack, 2012). In this vein, according to Hamann and Kapelus (2004), mining companies' CSR-related claims, and particularly the reference to a business case for voluntary initiatives, need to be treated with caution (see, also, The Economist, 2005). In this sense, CSR may just be a façade to bring some form of polish to an already tarnished image, or an avenue to bring a sort of appeasement to those excluded from the mineral wealth of

their own community lands (Hilson, 2012). Elsewhere, Banerjee (2018) argued to the effect that CSR has become a strategy enabling multinational corporations to exercise power in the global political economy to the detriment of vulnerable community stakeholders.

CSR activities almost never live up to their aims and can even have negative effects (Frynas, 2005; Slack, 2012). Bringing evidence from Guatemala, Slack (2012) highlighted the vast gaps between mining companies' stated commitments to CSR principles and actual implementation of these principles. This has been occasioned by the fact that these companies have not fully integrated CSR into their business models (Slack, 2012). Elsewhere, others have argued that CSR may be executed as a way of seeking to manage reputational, operational, or regulatory risks (Frederiksen, 2018). In this regard, CSR as a risk management strategy is not only inimical to community development promotion (Kemp and Owen, 2013; Owen and Kemp, 2013) but also engenders certain limitations including treating CSR as PR, targeting individuals and groups who pose the greatest threat to the execution of mining operations (Frederiksen, 2018). With community stakeholders having little to no say on the kinds of developmental projects executed (Banerjee, 2001), projects that are highly needed and people with the greatest need are often neglected (Frederiksen, 2018). Also, expectations of communities with regard to, for example, socio-environmental responsibilities may be completely different from those of the implementing companies (McLennan and Banks, 2019; Viveros, 2016). Relatedly, Campbell (2012) highlighted the shortcomings of CSR strategies, which, in an effort to respond to the problems of risk and legitimacy faced by mining companies, enact measures that do not address the origins that give rise to such problems and, thus, tend to mask the very nature of the problems at hand. Thus, many mining projects (especially in Latin America and India) continue to face community resistance/opposition (Banerjee, 2011, 2000; Maher, 2019; Maher et al., 2019), in most cases after the companies have implemented or promised to implement large CSR programmes (Banerjee et al., 2023).

A reading of these studies, however, reveals a certain particularity – a focus on, and a bias towards, CSR in large companies. As has been repeatedly pointed out, normative and empirical research on business ethics and CSR is relatively biased since the main focus has always been, and is still on, large firms and multinational enterprises, even if small-scale enterprises play a major role in socio-economic life (Demuijnck and Ngnodjom, 2013; Hartwell

and Devinney, 2024; Spence and Rutherfoord, 2003). Less scrutiny has been applied in this context to the empirical examination of CSR-related activities in small-scale mining settings. This is however not surprising considering that traditional approaches to CSR are based on the assumption that large companies are the norm and that CSR have been predominantly developed in and for large corporations (Jenkins, 2006). As such, our understanding, generally, of how small and medium sized enterprises implement CSR mechanisms in their operations has remained incomplete, see for example (Jenkins, 2006). Also, as a consequence of the narrow focus on large businesses, there is a lack of information on how smaller businesses should manage corporate social responsibility tasks and this is a major impediment to progress by small business (Redmond et al., 2008; Thompson and Smith, 1991). Especially in the mining industry, a critical engagement with CSR development in practice in ASM is lacking in the literature. This present study therefore aims to contribute to the literature in this regard by explicating the CSR practices of a small-scale mining company through the lens of Carrol's (1991) four-part model of CSR.

Carroll's four-part model of CSR

As noted throughout, the concept and practice of CSR has experienced significant progress, which has been backed by a variety of theories and frameworks that examine how it is implemented and how it has impacted business operations across the globe (Carroll and Shabana, 2010; Visser, 2008). In economic theory, the maximisation of profits has traditionally been given the highest priority, with the assertion that the sole responsibility of businesses is to increase the wealth of their shareholders (Carroll, 2016; Carroll and Shabana, 2010).

One of the most renowned proponents of this viewpoint, Milton Friedman (1970), argued that any activities that were not related to the pursuit of profit undercut the primary aim of a firm. This narrow vision has been questioned in the contemporary day, as corporations are increasingly acknowledging that sustained prosperity is dependent on wider societal elements (Carroll and Shabana, 2010). Therefore, this viewpoint has been expanded upon.

In this regard, one of the most established and accepted models of CSR has been the 'four-part model of CSR' as proposed by Carroll (1991) (Crane and Matten, 2016). Carroll regards CSR as a multi-layered concept, which can be differentiated into four interrelated aspects – economic, legal, ethical, and philanthropic responsibilities (Carroll, 1991; Crane and Matten,

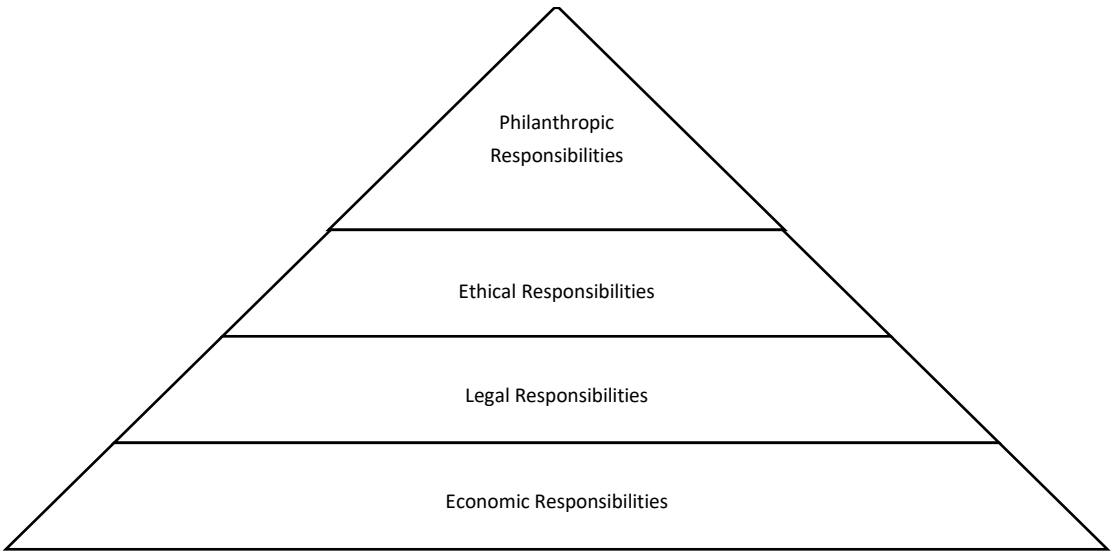
2016). Carroll presents these different responsibilities as consecutive layers within a pyramid, such that 'true' social responsibility requires the meeting of all four levels consecutively, depending on the expectations present in society at the time (Carroll, 2016; Crane and Matten, 2016). The ensuing discussion explains each of the four categories that comprise Carroll's four-part definitional framework.

Economic responsibility: Business entities have shareholders who demand a fair return on investments (Crane and Matten, 2016). Also, business entities have employees and other stakeholders who require good jobs and product satisfaction (Crane and Matten, 2016). Thus according to Carroll (1991) the first responsibility of business organisations is to be a well-functioning economic unit and to stay in business (Carroll, 2016, 1991; Crane and Matten, 2016). As a fundamental condition of existence, businesses have an economic responsibility to the society that permitted them to be created and sustained (Carroll, 2016). At first, it may appear unusual to think about an economic expectation as a social responsibility, but this is what it is because society indeed requires business organizations to be sustainable and the only way this is possible is by being profitable and able to incentivize shareholders to invest and have enough resources to continue in operation (Carroll, 2016). This first layer of CSR is the basis for all the subsequent responsibilities. Hence the satisfaction of economic responsibilities is 'required' of all business operations (Carroll, 2016; Crane and Matten, 2016).

Legal responsibilities: The legal responsibility of business entities demands that businesses abide by the law and 'play by the rules of the game' (Carroll, 1991; Crane and Matten, 2016). Here laws are defined as the codification of society's moral views and values (Crane and Matten, 2016). Society has not only sanctioned businesses as economic entities, but it has also established the minimal ground rules under which businesses are expected to function (Carroll, 2016). These ground rules include laws and regulations and in effect reflect society's view of "codified ethics" in that they articulate fundamental notions of fair business practices as established by lawmakers (Carroll, 2016, 1991). Businesses are expected and required to comply with these laws and regulations as a condition of operating. Therefore, abiding by these standards is a necessary prerequisite for any further reasoning about social responsibilities (Crane and Matten, 2016).

Taking the case of the small-scale mining industry for example legal responsibilities will encapsulate miners' adherence to the mining code. Considering the environmentally-destructive nature of mining operations for example, adherence to the mining code refers to miners' accountability for the environmental impacts of their actions, emphasising legal compliance. In this case, adhering to the mining code will mean well-structured efforts to remediate/restore mined lands. Mining operators also have responsibility to cater for workers' welfare (occupational health and safety, proper remuneration, and job security, etc.). As with economic responsibilities, Carroll suggests that the satisfaction of legal responsibilities is 'required' of all business operations seeking to be socially responsible (Carroll, 1991; Crane and Matten, 2016). The study presents (Figure 1) as a graphical depiction of Carroll's pyramid of CSR reflecting the fundamental obligations played and expected by business in society (Carroll, 2016).

(Insert figure 1 here)



CAPTION: Carroll's pyramid of CSR

(Carroll, 2016)

Ethical responsibility: These responsibilities oblige business operations to do what is right, just, and fair even when they are not compelled to do so by the legal framework (Crane and Matten, 2016). The normative expectations of most societies hold that laws are essential but not sufficient (Carroll, 2016). In addition to what is required by laws, society expects businesses to operate and conduct their affairs in an ethical fashion (Carroll, 2016). Taking on

ethical responsibilities implies that organizations will embrace those activities, norms, and standards that even though they are not codified into law, are expected nonetheless (Carroll, 2016, 1991). Part of the ethical expectation is that businesses will be responsive to the "spirit" of the law, not just the letter of the law (Carroll, 2016, 1991). Another aspect of the ethical expectation is that businesses will conduct their affairs in a fair and objective fashion even in those cases when laws do not provide guidance or dictate courses of action (Carroll, 2016, 1991). Thus, ethical responsibilities embrace those activities, standards, and practices that are expected or prohibited by society even though they are not codified into law (Carroll, 2016).

Here we can consider the public's scrutiny of the environmental quagmire associated with the small-scale mining sector in Ghana, see for example (Sojková, 2022). While exploitation of loopholes in legislation allow mining operators to mine illegally thereby polluting the land and rivers, the general public have reacted with outrage because the actions and practices of the mining operators do not conform to the society's mores and ethical norms (Ofosu et al., 2024b; Sojková, 2022). Carroll argues that ethical responsibilities therefore consist of what is generally 'expected' by society over and above economic and legal responsibilities (Crane and Matten, 2016).

Philanthropic responsibilities: Lastly at the tip of the pyramid, the fourth level of CSR looks at the philanthropic responsibilities of business entities (Carroll, 1991; Crane and Matten, 2016). The Greek word 'philanthrophy' means literally 'the love of the fellow human'. By using this idea in a business context, the model incorporates activities that are within the business' discretion to improve the quality of life of local communities and the society in general (Carroll, 2016; Crane and Matten, 2016). This aspect of CSR addresses a variety of issues, including things such as charitable donations, support for local schools and health facilities, or sponsoring of sporting events (Carroll, 1991; Crane and Matten, 2016). According to Carroll philanthropic responsibilities are therefore merely 'desired' of business entities without being expected or required, making them 'less important that the other three categories' (Carroll, 1991; Crane and Matten, 2016).

Important to the discussions in this study is the fact that Carroll's model structures the various social responsibilities into different levels, yet does not seek to explain social responsibility without acknowledging the very demands placed on business operations to be 'legal' and

'ethical'. In this sense, the relevance of the model to this present study is the fact that CSR goes way beyond the 'philanthropic' (voluntary) dimensions. Importantly, CSR also encompasses adherence to the legal and ethical obligations associated with any business operation. In this way, CSR goes contrary to the popular opinion that a prerequisite for discussing CSR should be that a business organisation is financially capable of providing altruistic and prosocial benefits to communities and ecosystems beyond their legal obligations. CSR mechanisms, to a large extent, defies the traditional view that conducting CSR presupposes that a company is in a position to conduct voluntary interventions and that doing so benefits the company. CSR, traditionally seen as focused on addressing philanthropic issues, instead adopts a framework of functional differentiation recognising the equal, overarching importance of legal and ethical obligations.

Thus, CSR is about the fact that a successful integration of CSR mechanisms into a business strategy must move beyond peripheral activities like charity (philanthropic activities), embedding legal and ethical responsibilities into core operations and decision-making. Hence CSR is also about the fact that indeed when operators in the extractive system, for example, converge in their legal formalisation efforts they can be declared as socially responsible. Complying with norms, such as social and environmental regulatory requirements for exploitation permits, along with the legal payment of royalties and taxes, for example, constitute CSR. There are also dimensions of internal CSR where companies seek to take care of their employees. This is very important in the context of the small-scale mining industry, an industry known for high rates of informality, devoid of CSR practices.

Thus, employing these dimensions as our guiding principle, we illustrate the CSR activities of a small-scale mining company in Ghana after the presentation of the methodology section. Before that however, in the paragraphs that immediately follow, we will shift the focus of examination on the ASM theme in Ghana in order to situate and contextualise our findings. We provide a brief overview of informality in the ASM economy, and more specifically, the socio-environmental challenges associated with the sector, which constitute the backdrop of the analysis.

Contextualising and situating our study in Ghana's ASM context

The ASM sector is often described as the low-tech, labour-intensive extraction and processing of mineral ores such as gold and diamonds (World Bank, 2019). Generally speaking, ASM operators are known to exploit marginal or small deposits of mineralised lands through the use of simple equipment, such as pickaxes, wheelbarrows and processing pans (Hentschel et al., 2003, 2002). In view of this, production is usually low (Hentschel et al., 2003). However, some studies have shown that not all ASM activities are low-tech and poverty-driven. Although ASM is generally associated with minimum mechanisation, in Ghana a growing phenomenon has been the intense mechanisation – the use of sophisticated technology such as excavators, dredgers etc. - of the small-scale mineral industry due to the influx of foreign capital (Bach, 2014; Crawford and Botchwey, 2017). Thus, according to IGF (2017a), ASM has become a complex and diversified sector that ranges from poor informal individual miners seeking to eke out or supplement a subsistence livelihood to small-scale formal commercial mining activities that can produce minerals in a responsible way respecting local laws.

The ASM sector can generally be considered both a blessing and a curse, offering opportunities and risks in equal measure (Adranyi et al., 2024, 2023; Baddianaah et al., 2023; Brunnschweiler et al., 2024). It is a blessing because it is not an enclave economy (as large-scale mining); on the contrary, it provides employment to an unskilled labour force, it dynamizes and diversifies local economies and improves livelihoods tangibly (Arthur-Holmes and Abrefa Busia, 2020; Donkor et al., 2024; Hilson and Garforth, 2012). In many rural areas in mineral-rich Ghana, ASM sometimes represents the only viable form of profitable economic activity for those living in poverty (Hilson and Garforth, 2013).

Formal barriers for entry for accessing ASM work opportunities are low. Thus, women and younger people tend to be engaged in the sector (Arthur-Holmes et al., 2022b; Ofosu et al., 2022, 2024a; Yakovleva, 2007; Yakovleva et al., 2022). Economically, the sector, for many years, has served as a motor of especially low-skill jobs in most mineral-rich areas in Ghana (Arthur-Holmes et al., 2022b; Banchirigah, 2008). Revenues from the ASM sector have provided 'start up' capital for the establishment of other small-scale enterprises and financed (Arthur-Holmes and Abrefa Busia, 2020; Hilson and Garforth, 2013). Funds from ASM have also facilitated smallholder agricultural activities. In the ASM agriculture complementarities cycle, there is an abundance of evidence showing a positive relationship between the two sectors (Hilson and Garforth, 2013, 2012; Ofosu et al., 2020).

Despite these positive attributes, the sector has often been highlighted as an enemy of the environment (Myjoyonline.com, 2017; Siaw et al., 2023). This is, however, not surprising considering that ASM operators are known to have little or no regard for environmental and work and safety mechanisms (Arthur-Holmes and Abrefa Busia, 2022b; Bansah et al., 2024; Mantey et al., 2016). Increased ASM activities have resulted in the destruction of farmlands and a reduction in agricultural productivity (Boadi et al., 2016; Damptey et al., 2020; Donkor et al., 2024; Obodai et al., 2024; Siaw et al., 2025, 2023). Degraded pits are usually left uncovered, thus posing danger to human and animal life (Bansah et al., 2018, 2016; Mantey et al., 2017, 2016). The sector is practised with high levels of environmental contamination, degradation and exposure to health risks (Baffour-Kyei et al., 2021; Ofosu et al., 2020).

With regard to health and safety issues, Arthur-Holmes and Busia (2022b) provided evidence highlighting very serious occupational and health hazards at a typical ASM site in Ghana. The evidence includes a lack of regulations and guidelines regarding safety protocols at mine sites, non-usage of PPE, odd working hours, and poor physical conditions at mine sites. Other findings include the creation of risky and dangerous pits within the abandoned open mine pits of large-scale mining companies, the carrying of mineralised materials in head pans, and the lack of childcare support at the ASM site (Arthur-Holmes and Abrefa Busia, 2022b).

However, nuancing the arguments surrounding the informality and socio-environmental challenges associated with ASM, in recent years, a consensus has developed around the idea that the problems of ASM, at least in the case of Ghana, are partly the responsibility of the national government and policymakers (Ayelazuno and Aziabah, 2023; Ofori et al., 2021). In the context of weak or unenforced laws and policies, coupled with insufficient institutional and regulatory capacity of state agencies mandated to regulate the ASM sector, ASM actors, it is argued, can indiscriminately pollute waters, deforest lands, and contaminate surroundings because the Ghana government has failed to bring the activity under the umbrella of formal regulation (Bansah, 2023; Hilson, 2017). Some scholars have called out the national government for its insistence on excluding ASM from legal frameworks (Hilson, 2017; Hilson and Maconachie, 2020). These scholars maintain, among other things, that formalization procedures have failed because they ignore the socio-economic factors that push miners to commit environmental crimes (Hilson, 2020; Teschner, 2012). Relatedly many

scholars argue that the capacity and financial resources required to meet the range of requirements to obtain mining permits are high, causing a barrier for miners who want to legally mine (Arthur-Holmes and Ofosu, 2024; Aryee et al., 2003; Bansah, 2023; Hilson, 2017).

Important to our discussions in this section, there is an astronomically high rate of informality, and a low rate of CSR practices surrounding the sector. Globally it is estimated that over 80-90% of ASM operations are informal (IGF, 2017b; Wagner, 2016). In the Ghanaian mining context, ASM informality reigns supreme (Eduful et al., 2020; Teschner, 2012) with even the formal/registered operators not adhering to environmental regulations (Botchwey et al., 2022). Hence the operators, generally, have very minimal to no regard for CSR activities, see for example (Vazquez-Brust et al., 2024). Due to the high rates of informality, it is extremely difficult to implement or enforce environmental remediation mechanisms and operators have blatant disregard for worker safety and general labour outcomes (Arthur-Holmes and Abrefa Busia, 2022b; Stemn et al., 2021) which is a violation of environmental laws and ethical standards. This is the ASM situation at hand and this where we situate and contextualise our findings which follow after the presentation of our methodology section.

Methodology

The selection and negotiating of access to the case organisation was one of the defining activities of this study. The process of selecting and negotiating access, as described by Harrington (2003), is the acquisition of consent to go where you want, observe what you want, talk to whom you want, obtain and read whatever documents you require, and do all of this for whatever period you need to satisfy your study purpose. In this regard, the organisation representing the case study was identified through the website of the Ministry of Lands and Natural Resources of Ghana.

After the identification of the mining firm, contact was made with some senior officials of the Minerals Commission to ascertain the operational status of the firm. After the officials had notified the researchers that the company undertook small-scale mining operations on registered concessions, the researchers started to negotiate access to the company. Messages were sent inviting the company to participate in the research. Working in close collaboration with the officers of the Commission, mutual expectations, research protocols and

confidentiality issues arising with respect to data collection and publications were agreed. After these detailed explanations regarding the purpose of the research had been given, the managers of the company agreed to the researchers' request to undertake an on-field study at the empirical research site.

This study employed a qualitative research design involving semi-structured interviews with the management and staff of the small-scale mining company – Agye Mines[1]. The company is located in the Eastern region of Ghana, with its expertise tailored to small-scale gold mining. As indicated earlier, Agye Mines is registered with the Minerals Commission of Ghana and has obtained the required permit to undertake small-scale mining operations. The operations of the company are highly mechanised, with machinery such as tractors, loaders, trucks and bulldozers as the main equipment employed in operations. The method of mining, as described by the project manager, is the extraction of shallow alluvial gold deposits.

Data collection for this study took place between February-June 2021 inside the mining compound of Agye Mines. During the research period, the first author visited the mining site to observe the day-to-day work and mining operations in the compound where 25 employees were interviewed (at the time of the research the total number of employees was 100). The interviewees included the project manager (1), the mine captain and his assistant (2), and the environmental and safety officer (1). Other interviewees were the processing supervisors (3), excavator operators (4), plant attendants (4), mine engineers (2), the administration staff and other workers (8). Two officials of the Minerals Commission were also interviewed. The purposive sampling technique was employed in selecting the members of management (especially the project manager and the mine captains of the company).

The rationale for the use of purposive sampling was the interest in eliciting responses with regard to formal arrangements and CSR practices that underpin the operations of the mining company. This is information that low-end workers either rarely have, or cannot divulge. As indicated earlier, a semi-structured interview guide was employed in soliciting the responses of interviewees. The use of in-depth semi-structured interviews allowed us to gain deeper insights into the operations of the mining companies. In this regard, members of the management were asked questions relating to the formal arrangements, licensing procedures,

[1] Pseudonym is used due to the issue of anonymity agreed upon with the company

environmental management processes, reasons behind the environmental management processes, reclamation etc. For the other workers, questions were asked about their safety protocols, renumeration, and health management among others.

At the start of every interview, interviewees were informed that their participation in the study was voluntary, and they were free to opt-out anytime they wanted. The idea of participation being voluntary was iterated throughout the research process. Interviewees were also assured of their confidentiality and anonymity during the interview process. A high degree of flexibility was also exercised during the interview process. The majority of interviews was conducted in the local language (Twi). The first author who conducted the on-site interviews is fluent in both Twi and English so there was no major challenge with interviewing and transcription. The interviews typically lasted 30-40 minutes each; they were tape-recorded with full informed consent and were later translated into English within 24 hours of data collection. As mentioned earlier, given that the company and interviewees were assured of their confidentiality and anonymity, their names have been anonymised in the final analysis.

Data analysis

The data analysis followed several stages. In the beginning, the audiotapes were carefully listened to many times. This was to make sure that the audio data were accurately reflected in the transcribed data and personal notes taken at the time of the interview. This was also done to ensure that the audio was in line with what was heard and observed in the field. After this, the researchers, particularly the first researcher, sought to identify the common themes across the data. Following this, the other researchers probed the data to ascertain the common themes identified. At this point, judgements about the meanings of contextual statements were made so that the relevance and importance of issues and implicit connections between them could be made (Hardy and Bryman, 2009). Here, the authors made cross-references between the transcribed data, mental notes, and field notes, and the original audio file, to get a better understanding of the recurrent and obvious themes.

In the next stage of the analysis, the field issues and challenges raised by the research participants were used to further probe the data to match their various accounts to determine

how well they fitted in with our initially generated themes. This involved the active recycling of the emerging and dominant concepts and perspectives and refining of some early insights and ideas that appeared inconsistent or contradictory to the empirical evidence. Finally, the thematic frameworks identified were then applied to the entire dataset by annotating them with numerical codes, which were also supported with short descriptors that elaborated the headings (Ridder, 2014; Ritchie and Spencer, 1993). This helped to develop a meaningful and more robust understanding of the data, which enabled the subsequent interpretation and the verification of meanings (Miles and Huberman, 1994). Following this, we engaged in what we consider to be a systematic and rigorous comparison of our indexed themes, which had reached a point of saturation, with the existing literature to build up an understanding of the formal and CSR practices of the organisations in order to develop greater insight into the operations, including employee welfare and environmental remediation mechanisms.

Findings

The 'legal' and 'ethical' dimensions of CSR

The environmental management practices of the case organisation

As explained earlier, CSR strategies encapsulate legal and ethical obligations. It is about fulfilling legal and ethical obligations to societal stakeholders. Put another way, business operations should obey the commandments of the specific nation and their ethical standards in which the business is operating. It is about performing in a manner consistent with expectations of societal mores and ethical norms (Carroll, 2016).

Under the Minerals and Mining Act (2006; Act 703) of Ghana the legal and ethical obligations of mining companies, among other things, entails obligations to address such matters as environmental management practices, including mechanisms that seek to engender a cleaner environment and environmental stewardship. This can be particularly important in the Ghanaian mining context where, as earlier indicated, the operations of ASM companies have

led to an environmental and work safety quagmire (Ofosu et al., 2020; Arthur-Holmes and Abrefa Busia, 2022a; Arthur-Holmes et al., 2022). In this regard, Agye Mines can be considered as good stewards of the environment[2]. The mining company undertakes reclamation and other waste management projects as a way of seeking to minimise the negative environmental impacts of their extractive activities. We examine some of the sustainable environmental management practices below.

Reclamation

As is common with the extractive industry, mined out areas are created through the mining of alluvial deposits. This is also the case with the operations of Agye Mines. However, management have incorporated land reclamation mechanisms into their operations to return the mined-out land to some form of productive use post-mining. It was observed under the supervision and guidance of the environmental officer that before mining the gold deposits, the topsoil was carefully removed and heaped for later use as reclamation materials. The subsoil was also carefully separated. After mining (excavating the mineral deposits), the boulders and the subsoil were deployed to cover the pits, after which, the topsoil was brought back to cover the site for rehabilitation. After this primary remediation process came the secondary reclamation mechanisms. According to the environmental and safety officer of Agye Mines:

> Propagative parts of Gliricidia and lucaeana trees are planted to fix atmospheric nitrogen into the soil in forms absorbable by plants. After this, plant species such as Emire, Ofram, Mahogany, Cedrela and Teak are nursed and transplanted for revegetation. Plantain suckers are also purchased for planting. This process is what is referred to as the secondary reclamation. To provide additional income, some of the employees are hired as labourers to help with the planting exercise and are paid daily.

According to the project manager, the reclamation exercises are undertaken, in part, to satisfy the demands of the regulatory framework including Ghana's Mineral and Mining Act. The Act, among other things, obligates licensed operators to deploy efficient and effective mining

[2] According to an official of the Minerals Commission, although the companies could do more to improve on air quality management and noise and vibration management, some of their basic environmental management practices including remediation of lands were quite good.

methods, observe good mining practices, and pay attention to the protection of the environment during and after mining. Failure to adhere to 'good' mining practices may lead to the revocation or the non-renewal of the mining licence by the Minerals Commission. Thus, according to the project manager:

> We do not want to lose our mining licence, as we have invested a lot of money in the mining project. We also see any dispute with the officials of the Minerals Commission as a distraction. That's one of the reasons why we always remediate or reclaim the land post-mining.

The mine captain indicated:

> We have been able to reclaim and remediate about 10 acres of land out of 13 acres in the first quarter alone. We will continue to reclaim and remediate the rest of the mined-out land. We need to return the land to the government and the landowners after taking out what we have been licensed for i.e. the mineral deposits. The lands do not belong to us and we need to make sure they are in very good shape for the land owners to use after we have left this place. It is our duty to do good to the lands, and we will do it.

Water and waste management

Mining projects can be sources of pollution to water bodies and the natural environment. However, to minimise the risk of pollution at the mine site of Agye Mines, the researcher observed that water ponds had been created to store water, which is then recycled and deployed for processing the mineral ores. According to the environmental officer, the ponds were physically examined on a daily basis to check for seepage into nearby streams. Hardened slimes were excavated and stored in the storage dumps and later transported to mined out areas via trucks. The freshwater ponds received clean water from the slime dams, which was recycled back to the washing plant. The ponds' embankments were reinforced regularly.

The project manager had this to say:

> We have carefully created the water ponds so that we can have sufficient water for our operations. Also, we do not want to pollute the nearby river. It is our duty to keep the

> water bodies surrounding us safe and this is why we have created our own water ponds for the processing practices

The management of Agye Mines ensures that in the management of the operations, all oil filters and other small oil containers were collected separately, drained, and flattened before disposal in a solid waste landfill. Those that can be recycled were stored in drums and sent to the suppliers for recycling.

In the words of the environmental and safety officer:

> As you can see (referring to the researcher) we make sure our mine site is as clean as it can possibly be. All waste and disposable are collected so that they do not find their way into the water ponds and the nearby river to pollute them.

According to an official of the Minerals Commission:

> When you compare the operations of this small-scale mining company to the industry benchmarks, this company is doing a good job. I hope you may be aware that other small-scale mining sites are in a total environmental mess. The media and the government are constantly talking about this. This company (Agye Mines) could, however, improve in other areas like the noise management.

Workers remuneration and safety

As earlier noted, the the legal and ethical dimensions of CSR include mechanisms that incorporate how a business operation interacts with its employees and deals with issues of workers' welfare. Here, interviews with the employees and management revealed that, in accordance with the Labour Act (2003; Act 651), all the workers had employment contracts as a way of securing their employment status. Even some apprentices, having worked for a period of up to six months, had also been signed on to work contracts.

One worker said:

> I started as an apprentice of this company. I was previously working at an informal mining site but one of my friends who works for this company spoke to the manager

> and they decided to take me as an apprentice first. After working for about 7 months, I was accepted as a full-time worker

Further, the workers are on fixed salaries with no worker paid below the minimum wage. Workers are engaged for eight hours a day. The skilled employees earned up to Ghc 3,000 (ca. US$ 500 at the time of the research work) per month. The minimum basic pay for the unskilled staff was up to Ghc 2,000 (ca. US$ 335).

When a processing supervisor was asked questions related to the remuneration mechanisms of Agye Mines, he said:

> We are paid regularly at the end of every month. The salary paid is exactly what has been agreed upon with management. We, however, believe that considering that the prices of goods and services keep increasing, it would not be bad for management to increase our salaries

A worker at the processing unit said:

> We receive our salaries at the end of every month. I've been here for more than 2 years and management has not defaulted on payments. Personally, however I think they should give us some weekly allowances to cushion our salaries.

Security at the mine site

The interviews data and the on-site observations showed that the management of Agye Mines had put in place security measures at the mine site. Security personnel have been employed at the work site with extra security provided by the police force whenever this is required. All company premises and mine sites are guarded throughout the day. To protect the workers, especially on night shifts, the project manager highlighted:

> Day and night, mobile and foot patrols are conducted in the concession to chase out and arrest thieves and other criminals throughout the year.

To further ensure the safety of workers and other personnel, thorough searches are conducted with metal detectors throughout the year on employees, management, and visitors who enter the high-risk zones. Also, to ensure the safety of the workers involved in the transportation of high-grade ores, the project manager explained:

> Vehicles are escorted by armed security personnel from service group mine sites to the strong room on a daily basis. On sales days, bullion escorts are conducted by armed policemen onboard company bullion van.

On the issue of work and safety, the management acknowledged that employees are exposed to potential health/life threatening situations and incidents whilst going about their normal duties. For example, excessive noise/vibrations from the processing plant, excavators, and generators as well as inhalation of dust or suspended particles from the site pose a health risk to workers. Fire hazards (from storage of flammable hydrocarbons, use of fuel-dependent machinery, use of electrical equipment, etc.) increase the level of risk to workers and property. To eliminate/reduce the risk of accidents/incidents, the following health and safety precautions were undertaken.

1. Training of workers in first aid: Some selected senior and junior staff drawn from different departments were taken through first aid training and certified by the Red Cross Society of Ghana.

2. Fire-fighting (fire drills): Staff, drawn from different departments, were taken through fire drills by the Ghana National Fire Service. The drills included fire education, prevention, and control. Personnel from the Ghana National Fire Service from the nearby fire station were engaged to organize a firefighting training session for some workers drawn from the various departments in February 2021. The first author (researcher) observed that fire extinguishers had been provided at vantage points in the mine including the office premises, fuel dump, plant site, and haulage trucks.

3. Safety mandatory signs: It was also observed during the research visits that warning and prohibition signs had been fabricated and erected at vantage points to improve overall site safety. The signs erected on the mine were to warn, give guidance, and protect persons from potential injury.

4. Personal protective equipment (PPE): The first author (researcher) observed during the on-site visitations that all the workers had PPEs while working on the site. Further interviews with the workers also revealed that they had been supplied with PPEs. The PPEs included helmets, raincoats, reflective vests, rain boots, nose masks, rubber gloves, leather gloves, ear plugs, etc.

When an excavator operator was quizzed on his assessment of worker safety and health management at the site, he explained:

> Although the management of work and health safety is good at the site, I believe the company could do more to suppress the dust emissions. We need to use the water bowsers more frequently in order to kill the dust completely.

It could be seen that the operations of Agye Mines had instituted some CSR dimensions with consequential benefits to the environment and the labour force of the company. Hence this study now takes the empirical findings as a launch point to discuss and conclude on the need for CSR in ASM, an exercise we undertake in the paragraphs that follow.

Discussion and conclusion

The environmental challenges associated with the extractive industry continue to give room for the emergence of some opposition to the operations of companies involved in the mining sector. Going beyond the environmental case, such opposition to mining operations has also increased because the general public believe many mining companies either have obligations or could do more to improve the socio-economic well-being of the people and communities around mining spaces (Idemudia, 2014). In such cases, to protect their reputation and to safeguard their business, one of the strategies through which mining companies have sought to paint a brighter picture has been to operationalise projects under the umbrella of CSR (Idemudia, 2014).

In these CSR strategies, prominence is usually given to mining companies' environmental remediation mechanisms. On the grounds of business ethics and appropriateness, mining companies seek to respond to developmental concerns in mining communities. Thus, companies integrate socio-economic and environmental elements that, although they may not

be considered in legislation, respond to the expectations of society with respect to the company (Dahlsrud, 2008). Addressing these concerns is, however, not only external; companies also have an internal responsibility mainly related to workers' welfare (occupational health and safety, proper remuneration, and job security, etc.), and to the profitability and economic welfare of shareholders (Dahlsrud, 2008).

Relatedly some studies have examined the CSR activities of small and medium-scale enterprises and their related approaches to improving socio-economic and environmental situations (Jenkins, 2006; Redmond et al., 2008). Nevertheless, few studies and reports have identified exemplary small-scale mining firms operating in emerging economies whose CSR models have the potential to transform and revolutionise socio-environmentally focused actions and narratives (Zavala, 2017). In this vein, this study sought to examine how the CSR agenda of a small-scale mining company in Ghana is implemented. With regards to Carroll's 'legal' and 'ethical' dimensions of CSR, we find improved and socio-environmentally sustainable projects which suggest that, contrary to the dominant narrative, small-scale miners can also be good stewards of the environment and caretakers of employees' welfare. We highlight that considering the specificities of Ghana's ASM sector and its associated underground social and environmental challenges, the case organisation of this study, exhibiting good adherence to legal and ethical responsibilities, can be considered a CSR 'champion' through its contribution to breaking cycles of informality and illegality.

Hence this research seeks to inform governments, the small-scale mining industrial players and other stakeholder groups more deeply about how CSR, in the context of mining sustainability, could contribute to positive changes. Moreover, the study seeks to help raise awareness and change perceptions about small-scale mining that would trigger stronger actions and engagement towards socio-environmentally friendly initiatives and involvement among stakeholders in the mining industry.

Turning the discussion to the informal ASM industry, this study also seeks to shed light on the broader consequences of CSR initiatives for ASM's reputation. In this regard, we note that 'good' ASM has become an oxymoron. By an oxymoron, we refer to the bringing together of two apparently contradictory ideas, such as 'a cheerful pessimist' or 'organised chaos'. To refer to good ASM as an oxymoron suggests that there is not or cannot be responsible ASM,

that is, that ASM is inherently bad. To a large extent, it is not surprising that some people think this way. A long list of scandals and irresponsible ASM practices have highlighted the 'bad' ways in which some companies have undertaken their operations (Botchwey et al., 2022; Wagner, 2016).

Of even greater concern, the bad practices go beyond the operations of informal operators. Legalised/formalised and educated operators, despite the profound negative impact of their ASM operations on the environment, fail to adhere to good environmental practices and even do 'not perceive their activities to have significant negative environmental consequences' (Botchwey et al., 2022). Thus, formalisation (licensing) of ASM operators may not necessarily be the panacea to curb the environmental excesses of small-scale mining operations (Botchwey et al., 2022). Therefore, making a case for CSR in ASM, we submit that the very desirable reforms ASM operators seek could begin with an in-house cleaner production mechanism. At the base, employees of ASM operations should be guaranteed better working conditions. Land reclamation mechanisms ought also to be prioritised. These activities would not only benefit society but also create favourable impressions of ASM operations.

Perhaps, until ASM operators begin to take proper care of the environment by adhering to the legal and ethical regulatory framework, they would continue to be stigmatised. Hence, ASM operators, despite their informality, could begin to present a cleaner face in terms of, particularly, environmental remediation and improved labour practices. Although this could prove challenging for informal operators, it should not be beyond the capabilities of formalised and mechanised operators.

The main point here is that ASM operators would stand to benefit from engaging in CSR activities. By being environmentally responsible, for example, most ASM operations, although largely informal, can gradually build a good reputation in the eyes of governments, policy makers and the general public. This would help attract the needed policy attention and financial support that could help properly position ASM in policy development circles. Consistent with the 'it pays to be good', see for example (Jenkins, 2006), it is in the self-interest of ASM operators to behave ethically and responsibly. Otherwise issues of bad image can lead to damage to their reputation which would mean that continuously ASM would be peripheral

to livelihood improvement and mineral sector development programmes, see for example (Clifford, 2022).

It however ought to be acknowledged that to be able to practise CSR strategies, informal ASM operators require support. Responding to the long-time call for sustainable resource development in Ghana and beyond requires a stronger commitment on the part of the government to proactively pursue responsible mineral-policy initiatives that can attempt to correct decades of irresponsible resource exploitation in the mining regions. In this regard, it has long been noted that the formalisation of ASM has become a 'legislative afterthought', introduced long after mining companies had monopolized access to mineral-rich lands (Hilson and Banchirigah, 2009). The release of large tracts of land, including farmlands, to large-scale mining entities have led to few employment opportunities in the rural economic space; informal ASM has thus become the only viable economic option (Banchirigah, 2006; Hilson and Yakovleva, 2007; Teschner, 2013). As large parcels of land have been long occupied by industrial mining operators, for ASM actors keen on securing permits, only very limited amounts of land that are geologically-viable are available. This makes it more attractive for ASM operators to continue operating informally, specifically outside of the legal framework (Aubynn, 2009; Hilson et al., 2020). In this regard we agree with scholars such as Hilson (2017) that mining authorities would need to address the thorny issue of access to mineralised lands for ASM operators. Granting operators access to mineralised concessions would ensure security of land tenure. This might enable them to invest in employee welfare and environmental remediation.

As with most research, this study has limitations that can be addressed by future studies. Primarily, our study focused on the 'legal' and 'ethical' dimensions of CSR with regard to the operations of a small-scale miner in the Ghanaian context. Further research can therefore examine the 'economic' and 'philanthropic' dimensions of ASM actors, or possibly examine all four dimensions of Carroll's model with regards to the operations of ASM actors in Ghana and other mineral-rich contexts. By so doing scholars might also highlight the challenges that confront ASM actors as they seek to implement the dimensions of CSR, so as to provide insights that could either help reshape policy or refine ideas about CSR implementation in ASM contexts.

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