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**The Social Impacts of
Land Privatization:
A Literature Review on
Ethiopia, Ghana,
Mozambique and Zambia**

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Introduction

Land a crucial element for society's wellbeing as it provides employment and is a standard livelihood source for many (Cotula, et al. 2004: 1). In the case of Africa, more than 70% of the continent's people, especially those residing in rural areas, depend on subsistence agriculture for their livelihoods (You et al. 2011). Intriguingly, a popular perception exists that much of Africa's rural land remains underused because it is not integrated into the world market. The fact is that these lands are communal lands, used for crop rotation to preserve soil fertility, pastoralism, foraging and by the very nature of this use there are not intensively worked.

The 2007/8 world economic crisis, brought a new cycle of interest towards African lands (The Land Matrix 2021; Hall 2011; Borras Jr./Franco 2012). Its favorable biophysical environment, fertility and non-existent large-scale industrialized agriculture compared to other continents (Nkansah-Dwamena 2021: 244) made it an even more attractive place to provide food and fuel security issues that arose during this crisis (Parulkar 2011; Bush et al. 2011). Governments and investors targeted the communal lands which led to their being fenced off and privatized.

There are many different definitions used for this recent phenomenon of large-scale privatization of lands. According to Borras Jr. and Franco (2012), the term Large-scale land acquisitions (LSLA) has been used academically and in the field by International Financial Organizations and Investors, indicating the depoliticized privatization of large swathes of land. In general, this involves the acquisition of 200 hectares (or more) of productively used or potentially arable farmland by corporate investors to produce food and non-food crops or obtain favorable financial returns on investments, such as speculation on land (Akram-Lodhi 2012: 125). For comparison, according to data from the FAO (2017), smallholders in Africa tend to farm plots with sizes varying between 1 and 7 hectares (between 0.01 and 0.07 km²) depending on the country and region.

Still following Borras Jr. and Franco (2012), the terms 'land rush', 'land enclosures', 'land grabbing' and 'commons grabbing' are also terms used to describe the same phenomenon, mainly used by academics, activists, international organizations, and the media more critical of these developments, due to the dispossessions and displacements that ensue from this acquisition of large swathes of land (see also Nkansah-Dwamena 2021: 244; Hall 2011; Carroccio et al. 2016: 2). It is also a broader term because it includes the small-and medium-scale, domestic land grabs that are actually more common, but are often left out of analysis of large-scale land acquisitions (Yang/He 2021; Jayne et al. 2016; Sitko/Jayne 2014; Borras Jr. et al.

2011). In this paper we use the terms 'large-scale land acquisitions' and 'land grabs' interchangeably.

This paper is a literature review of this recent and ongoing phenomenon of large-scale land acquisitions in four African countries, searching specifically for its effects on the rural social question, that is, the socio-economic change this development option promises to promote. We seek to understand what the literature has to say about the effects land privatization has on people's livelihoods, where do they go when they are displaced, how they compensate for the loss of land and what types of social policies there are in place for those displaced. We also looked at the differing effects of the different land grabbers, be they states, enterprises, foreign and domestic investors on the local livelihoods. The review of our case studies found the following commonalities:

- Government investors play a significant role in these land deals, and are interested in different regions in Africa and concerning different types of production. For instance, countries in the Arabian Peninsula invest in food production in the Horn of Africa, while the EU invests in biofuels in sub-Saharan Africa.
- The most common drivers of agricultural land grabs are biofuel plantations, followed by export commodities such as cotton, sugar or cashews nuts.
- Legal pluralism in the form of traditional tenancy and statutory land regulation often creates less tenant security and frequently leads to the poorer smallholders losing their lands. There is low accountability to peasants and often no compensation for the loss of lands or livelihood opportunities.
- The existence of legal provisions for acquiring land, such as consultations and environmental impact assessments that seek to protect traditional communities are often not enforced because communities lack knowledge of them.
- A lesser known facet of land grabbing is the domestic one evidenced by the rise of the medium-scale land grabs by national urban dwellers (ranging between 5-100 h) as the fastest growing phenomenon in our case countries in the period.
- When peasants are forcefully dislocated, they are relocated to poorer lands or other villages with access only to less fertile, marginal lands, with limited access to water and irrigation, roads, markets, health and education services, seasonal jobs, even better seeds and fertilizers.
- Dislocation also has an effect on food security, for it frequently happens under short notice, interrupting the growing season and affecting harvest and people's ability to take food with them.
- Land dispossession and redistribution increases social differentiation within villages. Women, youths, the elderly and pastoralists are especially disadvantaged since they have limited abilities to make claims on land. Women's workloads are markedly increased as they have to spend more time

gathering water and firewood and take over the household duties of the male family members who have migrated for work.

- Peasants are not passive. Some communities actively invite and welcome these investments, others reject them all together. This outcome is highly dependent on the historical encounters each community had with investors.
- Resistance to land grabs takes many forms: appropriation of what is meant to be efficient and productive use of land; burning of plantations, occupation of land that had been expropriated, and formal complaints when firms fail to deliver promises.

This text is divided into seven sections. In the first section we provide a brief overview of the methods used for this literature review. The second section provides a general overview of land grabs in Africa and its effects on peasant livelihoods. In sections three, four, five and six we present our respective case studies on Ethiopia, Mozambique, Ghana and Zambia. These cases appear in the literature in varying degrees of prominence of cases of land grabbing in sub-Saharan Africa (Yang and He, 2021). We use these cases for a first look comparison at the similarities and differences of these patterns of land privatization and social change in these different national landscapes: what actors appear in each country (who's doing the land grabs, what resistance looks like), state policies that may enable or hinder land privatization, the relationships between the elites and the different actors in society in enabling this process, and what is the history of the strategy for rural development.

In our conclusions we find that the question of how people compensate for the loss of livelihoods is only partly answered by the literature. People seem to engage again in agricultural endeavors in their new localities. But in the time between displacement and the new fields being ready for harvest, how people cope and what types of social policies there are for these cases has not been explored. This is especially interesting since land grabbing is not just a matter of state greed, as it is often portrayed in the literature. It is also an arena in which the struggle for authority of lands is played out between the state and traditional communities.

Methods

In this literature review, we analyze existing literature on large scale land acquisitions (LSLA) in sub-Saharan Africa and what changes in land property and livelihoods occur as a consequence to these changes. We look at what the literature has to say about how old and new actors, motivations, means and problems have been dealt with and/or changed over time. In searching for articles, we used the Web of Science, ProQuest, Science Direct and Google scholar databases and search terms such 'land grabbing', 'large scale land acquisitions', 'global land rush' and 'Africa', especially since 2007. The initial search that met our search criteria resulted in more than 240 articles, book chapters, reports and books covering a range of topics such as food security, green grabbing, biofuels, changes in land use and livelihoods, displacements, and conflicts. Since we were looking for the social effects of these types of land acquisitions specifically targeted for agriculture, the number of articles finally analyzed was smaller. Most of the studies found in our search were qualitative with little statistical analysis, which entails very few articles that provide numbers on this phenomenon. Yang and He (2021) confirm this qualitative bias on the study of land grabs in their literature review.

Ethiopia, Mozambique, Ghana and Zambia appear in the literature as prominent countries in which large-scale land acquisitions occur. In comparing the similarities and differences between these cases, we are able to paint a picture of the general trends of land grabbing in the African continent.

General characteristics of large-scale land acquisitions

As a strategy to reduce rural poverty and promote rural development and food security, in the mid-2000s the World Bank encouraged countries in the Global South to shift production focus from smallholders to large farms. In Africa, this led to the foreign acquisition of communal lands, that were worked by smallholders and pastoralists. The effects of such shift proved to be more negative than positive, due to the frequent land dispossession of smallholders and pastoralists, often without compensation, threatening their livelihoods and worsening rural poverty. The benefits were very unequally distributed, with the national elites and local chiefs benefiting mostly, and women, youths and pastoralists worse off than before due to their inability to make claims on land. The next sections will view in more detail the outcomes of these land deals.

The context of the new land rush and how it differs from previous ones

Much of the literature written between 2009 and 2013 (which coincided with the peak of number of articles written on these sorts of acquisitions) was concerned with defining the phenomenon specifying the global drivers of land acquisitions. According to Hall (2011), Bush et al. (2011), Anseeuw et al. (2012: 24) and Akram-Lodhi (2012), a renewed interest in land in the global south arose after the 2007/8 economic crisis and unfavorable weather heightened food insecurity. Investors needed a safer space to invest capital and land was the chosen means, while hiking food prices and growing urban populations led International financial institutions to promote the privatization of land.

Bush (2011), Akram-Lodhi (2011), Daniel (2012) and German et al (2011:1) identify the defining characteristic of this new rush for African lands, and something that sets it apart from previous bouts of land grabs is the participation of international financial markets, in the forms of Sovereign wealth funds¹ and the speculative acquisition of lands without developing it. Land speculation is still an ongoing phenomenon and a problem governments are still dealing with. The literature, however, has shifted focus from denouncing land speculation towards the effects of these

¹ A sovereign wealth fund is a state-owned investment fund that invests globally in real and financial assets.

speculation on communities (Tamura 2021) and specific populations within these communities (Kaarhus/Dondeyne 2015; Walker 2020)

Steel et al. (2019: 391) and Cotula (2012: 650) identify a global population increase especially in the urban areas, changing diets, hiked value of land and increased activities in the extractive industries, tourism and natural parks as other drivers of land grabs (Cotula 2012: 650). In 2009, the World Bank argued that in light of the expected global population growth, Africa's supposedly underutilized land (mostly used by smallholders), extending from Guinea Savannah down to the East Coast of Mozambique, should be open to commercial development in order to meet the global demand for food security (World Bank 2009: 2). This particular report is recognized as a shift in the World Bank's positioning in regards to rural development, from supporting smallholders towards promoting large farms and foreign investors. The paradigm shift is due to the fact that large farms have easier access to credit, insurance and economies of scale (Müller et al. 2021: 2; Borras Jr. et al 2011; German et al. 2013; Akram-Lodhi 2012). Their insertion into the international markets would bring investments and these investments would have spillover effects on smallholders (Chambati et al. 2019; Daniel 2012).

Through its Foreign Investment Advisory Service (FIAS) in the form of technical assistance and advisory services to developing countries, the World Bank worked with African governments to remove legal obstacles to foreign acquisition of land by foreigners and tax-breaks for agri-business (Bramley 2014; Daniel 2012; Akram-Lhodi 2012). Alongside this, the Bank created the Emerging Markets Private Equity Association (EMPEA), to bring equity and venture capital enterprises into emerging markets (Daniel 2012: 723). Daniel (2012), Buxton et al. (2012) and Hall (2011) point to the connection between the World Bank's activities and a massive rise in land acquisitions by foreign investors, not only on commodities, but also on mining activities, reservoirs of environmental services. Bio-fuel investments as an alternative source of (renewable) energy were made specifically for the EU (Hall 2011).

In their literature review on land grabs, Yang and He (2021: 4-5) found that parts of South East Asia (Cambodia, Laos, Philippines and Indonesia), Eurasia (Ukraine and Russia) and Africa (Sudan, Ethiopia, Madagascar and Mozambique) top the list of receivers of large-scale land investments. Deininger et al (2011:51) report an estimated 56.000 square kilometers of land – an area of the size of Togo - was acquired for such large investments between 2008 and 2009, two thirds of which (an equivalent of close to 40 million ha) in Africa. Friis and Reenberg (2010: 8 -11) provide similar numbers: between 51.000 and 63.000 square kilometers of land were affected by 177 land deals in 27 African countries either already assigned or still under negotiation between 2008 and 2010.

Yang and He (2021: 4-5) have also reported that Ethiopia, Madagascar and Sudan had the highest number of individual land deals of about three million hectares. These were followed by Tanzania, Mali, Mozambique, Uganda, DR Congo, Nigeria, Zambia, Ghana, Malawi and Senegal. Borrás Jr et al (2011: 209) and Anseeuw (2013: 163) significantly point out that a South-South dynamic has also been recorded with the significant involvement of countries like South Africa, Brazil, Malaysia and Qatar as countries of origin of investors.

It is essential to note that there is an acute lack of numbers, or reliable statistics as regards to land deals, with international databases (i.e. The Land Matrix, and GRAIN) relying on media reports of land deals for information (Vermeulen/Cotula 2010). This is caused by factors such as lack of publicly available data from governments, lack of appropriate technology for land registration and disorganized land administration systems in which some governments are themselves unaware of certain deals. Schoneveld (2011:3) particularly points out that more likely than not data on investment deals are themselves missing while in other cases, excessive reliance on simplified and exaggerated media accounts led to recording of deals that did not materialize or were smaller than initially anticipated. This, in turn, not only makes the small- and medium-scale land grabbing phenomenon less visible, because they are not as widely reported, but also, according to Holmen (2015), make the price of land very hard to estimate. It also masks the multiple actors at the international, national and regional levels involved in various sorts of investments of varying scales (IIED 2012). This is a difficulty that still persists to this day.

Main Actors

Governments

Government investors include Middle East and Asian countries such as India, South Korea and China, the United States, former colonial powers of the European Union (EU), the United States and South Africa (Ibrahim 2021: 2; Cotula 2012: 669; Borrás Jr. et al. 2020). There are different motivations behind these investments, among them ensuring food security for their homelands, to environmental preoccupations about fossil fuels.

Investors from EU-countries, following Caroccio et al. (2016:1), Cotula (2012: 668) and Hall (2011:197) are primarily driven by the interest to achieve energy security and reduction of carbon emissions in line with EU Policy of Sustainability.

A lot of scrutiny has been placed on China and India as drivers of land grabs in Africa due to their expanding food needs (Parulkar 2011; 109; Brautigam and Ekman 2012: 403). Brautigam and Ekman (2012), however, stress that the focus on China,

for instance, fails to acknowledge the active role national governments have in asserting their policy goals. They give the example of Mozambique, where increasing rice production was in fact a goal of the Mozambican government, seeing that rice is part of the regular diet. The government searched for partners to achieve this goal, with China being one amongst many other investors. The lack of transparency of land deals nonetheless often lead to negative perceptions of Chinese investments internally and internationally (Lagerkvist 2014).

Throughout Africa, South African farmers are among one of the most prominent active actors in large-scale land acquisitions. Many white farmers fled post-apartheid land reforms in South Africa and settled in other African countries, bringing their farming business with them. Conversely, South African government has supported such moves (Bush et al 2011, Hall 2011).

Financial Capital

International private capital is, as previously mentioned, a new actor in these land deals (Cotula et al. 2009; Anseeuw et al. 2012). They vary from agribusiness ventures to finance capital. Akram-Lodhi (2012) and Hall (2011) illustrate how financial speculation spilled over the international financial crisis of 2007-2008 in two forms: as hedge and as speculative investments. Hedge funds invest in agricultural and bio-fuel production (Bush et al 2011). They are often export-oriented and do not contribute to the state's agricultural development policy (Parulkar 2011). Speculative investments, the acquisition of land and waiting for it to increase in value, is consequently also not involved in food production (Akram-Lodhi 2012) and provide little in terms of job-creation and returns to the dispossessed farmers (Parulkar 2011, Daniel 2011).

Local investors, both large and small scale, agribusiness, the diaspora, private and government developments are significant in this trend despite the less attention they receive in the literature. Often, land acquisition by international investors happens in collaboration with powerful local elites and Diaspora (Ibrahim 2021: 1; Jayne et al. 2014: 36; Ariyo/Mortimore 2015, Rahmato 2014, Fairbairn 2013; Parulkar 2011). These elites are active both in changing legislation (through their participation in the ruling political parties) to facilitate international investment and in participating in these investments. These chains of alliances have facilitated large acquisitions of land as has been documented in many other African countries such as Zambia, Mozambique, Tanzania, Kenya, Uganda, Ethiopia, DRC, Mali, and Liberia among others (Koussoubé 2013; Chelwa 2015; Hall 2011; Bush et al. 2011: 189; Haller et al. 2020: 9). Yet, the role of the different levels elites and agribusiness in shaping national land legislations through lobby and their competition in regards to land acquisition and rural development policies that often accompany these

deals is frequently overlooked (Manda et al. 2020a, Burnod et al 2013) because of the hyper focus on the international sphere, and simplified as mere corruption and gate-keeping.

The rise of the medium-scale land grabs (ranging from 5-100h) as the fastest growing phenomenon in our case studies is also less discussed in the literature. These new medium-sized farms are commonly owned by urban dwellers, who often have ties to the political parties and the elites. They tend to not cultivate the land, using it more as weekend or vacation getaways (Chitonge et al. 2017; Jayne et al. 2016; Sitko/Jayne 2014). Less often, the better-off smaller peasants are able to increase their landholdings. In these cases, the land is more intensely cultivated for food production (Jayne et al 2014). This phenomenon, however, and the role of the diasporas in land-grabbing are under-studied.

There is little written on land grabs by peasants, though this is a phenomenon that does exist. By this we mean how many peasant communities occupy areas (often privatized) for their subsistence activities, in general as a response to being pushed out of their own land for various reasons. The literature that does delve into this matter tends to concentrate on Zimbabwe's 1980 agrarian reform and the recent similar land acquisition movements by foreign firms and investment funds.

Problems of large-scale land investments and effects on livelihoods

"Idle" land

The changing land acquisition and use patterns has been supported by the argument that it brings more livelihood opportunities to local communities while promoting national development and ensuring food security for a rapidly increasing global population. The definition of 'idle land' is however extremely contested, and has been used by colonial administrations to seize land (Kakande 2020; Hall 2011; Cotula, 2012; Anseeuw et al. 2012).

In terms of assumed underutilized land, quite often, these are communal lands that are in use for grazing or shifting cultivation mostly dependent on rainfall, or are covered by tropical forests or are located in protected areas (Hall 2011, Bush et al 2011, Cotula, 2012; Anseeuw et al. 2012). What is considered underutilized land is in fact in use by about 80 million small-scale farmers who contribute 30% of its GDP and most of the continents' food needs Hall 2011: 194).

Despite the stated opportunities as well as development of agricultural infrastructure, there have also been concerns over land grabs' negative impacts such as on the environment, sovereignty, development, conflict, rights and livelihoods particu-

larly the loss of family farming as a result of displacement (Cotula/ Vermeulen 2009:649; Balestri/Maggioni, 2018:428)

According to a 2009 report that focused on acquired or proposed land acquisition of the size of over 1000 ha (through purchase, lease or otherwise) in five sub-Saharan African countries i.e. Ethiopia, Ghana, Madagascar, Mali and Sudan, land acquisition resulted in pressure on high value land (i.e. those with irrigation system and proximity to the market) and was dominated by the private sector with support from government and foreign investors (Cotula, et al. 2009: 3-4). Since then, the literature on large-scale land acquisitions has consistently shown that most land deals take up a high percentage of the host countries' fertile and infrastructure-rich agricultural land², having a higher negative impact on the local population's livelihood (cf. Friis/Reenberg, 2010:10-12; Regassa et al. 2019; Moreda 2017; Boamah 2011; Yaro/Tsikata 2014).

Land tenure systems

Land acquisition is particularly complicated by the fact that there are different legal land regimes within most African countries, inherited from the colonial administrations. On the one hand there is customary law, that is, communal ownership of land and land distribution controlled by community leaders (often described as traditional chiefs), without any deeds of ownership or titles. These appear often in rural areas. On the other hand, there is statutory law, exercised over what is deemed state land, which is titled (everything that does not comprise community land, in rural and urban areas). In this scenario, land titling has been promoted since the 1990s as a means to protect both private investors and smallholders/pastoralists (Byamugisha 2014, Boone 2017a, De Soto 2000).

Despite the promises of protection, land titling is process associated with some degree of dispossession or exclusion, heightened social tension and increased inequality (Boone 2017a, Chimhowu 2019). The weaker legal status of customary land regulation in most cases means that they are often superseded by statutory law³ (Alden Wily 2011; Batterbury and Ndi 2018: 573 and Tsikata 2015). Weak institutions, in-existent or weak land property rights, ineffective legal, political and institutional processes and lack of a formal legal framework for communal land are often taken

² Cf. Lunstrum 2016, Nhantumbo/Salomão 2010, Hanlon 2011; Matavel et al 2011; Beekman/Veldwisch 2012; Porsani et al. 2017; Eskezian 2020; Moreda 2017; Alawirew et al 2015.

³ There are exceptions, such as Ghana where customary law is recognized by the state and has its own jurisdiction. Even there, though, the state is seeking to hybridize the tenure system (see Chimhowu 2019).

advantage of by not only potential investors, but local and national elites and state agents. Fairbairn (2013) and German et al. (2013) argue that even in situations where legal frameworks exist, they are easy to circumvent due to local power structures. Lavers and Boamah (2016) qualify this finding by stating that state-society relations and state capacity are important determinants in this power struggle. They give the examples of Ethiopia and Ghana. In Ethiopia, state authority is strong and has directed agricultural investments to the peripheral lowlands, to promote not only rural development, but as a cornerstone of their state building project and to increase control over a part of the territory where the state has been absent (Lavers 2016). In Ghana, on the other hand, the traditional chiefs have been historically strong and have used investor interest in their lands to reassert their authority over land, instead of the state (Lavers/Boamah 2016: 94). In either case, the provision of access to land for international investments is a dispute for authority over land and the reach of the state's authority.

Within these power struggles, the voices of local communities are often excluded in the rushed consultation processes in the negotiation of large-scale land acquisitions (Veldwisch 2015, Mushingge/Mwanda 2016, Matavel et al. 2011, Borras Jr. et al. 2011, Hanlon 2011; Regassa et al. 2019). Peasants and local chiefs often fail to grasp the land laws and the widespread effects of land allocation to their communities and livelihoods (Mushingge/Mwanda 2016), which violate different guidelines for responsible conduct.

Land dispossession and the rural social question

Through dispossession, otherwise self-reliant locals are pushed into the labor market that is characterized by few casual low-income seasonal jobs (Hall et al. 2017) under various layers of competition for work and for higher-value resources. In general, salaries are depressed, poverty is worsened in varying range due to conflicts, dispossessions, displacements and loss of livelihoods without compensation (Nkansah-Dwamena 2021: 245; Nhantumbo/ Salomão 2010, Ubink/Quan 2008; Berry 2017; Borras Jr. et al. 2011, Matavel et al. 2011; Lunstrum 2016). Promises of technology transfer also rarely trickle down (Batterburry/ Ndi 2018: 573). As Nolte (2011) wrote, it is not clear how large-scale mechanized agriculture can trickle down to a farmer that uses very simple technologies. A frequent recurrence is the failure of such projects (Hanlon 2011).

When peasants are forced to leave their land, it is often under short notice, interrupting the growing season (Horne/ Mittal 2011) and affecting harvest and people's ability to take food with them (Agle 2019). Peasants are often relocated to other villages with access only to marginal lands, characterized by low fertility, limited access to water and irrigation, far from roads and markets (Achampong/Campion

2014, Chu 2013b), health and education services (Horne/ Mittal 2011) seasonal jobs (Yaro/Tsikata 2014), even limiting access to better seeds and fertilizers (Suhivini et al 2018). Dispossession and displacement increase competition for land and water resources that in turn heighten violent conflicts (Carroccio et al. 2016). Land conflicts are made especially contentious due to feeble land tenure institutions (Lunstrum 2016; Boone 2017b), the loss of family farming (Cotula/ Vermeulen 2009:649; Whi/Maggioni, 2018:428), and increasing food insecurity. A parcel of the smallholders that stay are often rendered uncompetitive by capital-intensive production and are forced into resettlement programs. There is a lack of explanation in the literature about the coping mechanisms peasants are then forced to rely when they are dispossessed of their land, and what types of social policies and government support they can rely on.

It is very important to stress that peasants are not a homogeneous group (Bruna 2019). They have different views and benefit differently from land acquisition. Land dispossession and redistribution have been found to increase social differentiation within villages. Women, youths and pastoralists are especially disadvantaged since they have limited abilities to make claims on land (Yaro/Tsikata 2014, Chu 2013b; Horne/ Mittal 2011, Matavel et al. 2011; Kaarhus/Dondeyne 2015; Walker 2020; Chambati et al. 2019). Loss of land often affects other sources of compensatory incomes, especially those of women (Andrews 2018, Ayelazuno 2011, Horne/ Mittal 2011), leading some to abandon agriculture altogether Matavel et al. 2011).

According to Hall (2011) and Borras Jr/Franco (2010), when changes in land use result in changes in the social relations of production, such as the ones mentioned above, protests and contestation over land deals ensue. Peasants are not passively watching their land be taken (Suhivini et al., 2018:1135), and they have multiple strategies to resist these changes. Strategies vary depending on the economic and political agencies involved, as well as the social structures, strengths and defensive capacities (Moreda 2015: 519). Sometimes they appropriate the meaning of efficient and productive use of land, such as in Mozambique and bring new technologies such as tractors and improved seeds to show the government that their use of land is in line with government rural development strategies (Beekman/Veldwisch 2012). Other times, they burn crops, machineries and buildings and even carry out assassination of plantation managers (Moreda 2015) or build their houses and cultivate fields on land that had been expropriated (Salverda/Nkonde 2021). Another strategy is to file formal complaints when firms fail to deliver promises (Acheampong/ Campion 2014; Fairbairn 2013). These types of resistance were found in all of our case studies. Moreda relates the intensity of resistance and defiance to large-scale agricultural investments to the state's presence and ability to enforce control

over the territory. The more remote the land and weaker state presence, the more intense resistance these projects find (Moreda 2015: 529). The more entrenched the state is in the region, the more likely that resistance will not result in changes favorable to smallholders (Bussotti 2020)

To counter these negative effects of large-scale land acquisitions, contract farming and out-grower schemes have been developed as alternatives. Hall et al (2017) have found that commercial and contract farming areas produce the most local economic linkages while plantations/ estates produce more jobs albeit low quality and seasonal. Nonetheless, contract farming and out-grower schemes have had similar outcomes and consequences of large-scale land acquisitions, such as dispossessions without compensation and social differentiation (Tamura 2021; Veldwisch 2015). When good outcomes do occur, it is highly dependent on local conditions (Hall et al. 2017).

The literature has reported that due to the international outcry caused by land grabs, the World Bank, along with the FAO and private investors have set up in 2012 the Principles for Responsible Conduct⁴ (Bush et al 2011; Akram-Lodhi 2012). These voluntary principles are aimed at corporations and focus on foreign investments but fail to recognize the political role of domestic inequalities in land conflicts. Where the role of national elites is recognized, it is deemed a technical matter of good governance (Fairbairn 2013: 337). The voluntary nature of the principles is an impediment to their effectiveness as they render corporations accountable only to their investors at the expense of local communities (Hanlon 2011, Daniel 2012).

In the next sections we will explore cases of large-scale land acquisitions in four countries: Ethiopia, Mozambique, Zambia and Ghana. For each case a historical background of land governance will be provided, as well as the current trends in land acquisition and their impacts.

⁴also known as 'Responsible Agricultural Investment', are informed by the Voluntary Guidelines on Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security (VGGT), promoted by FAO.

Case Study I: Ethiopia:



Map 1: Topographical map of Ethiopia with main roads (public domain)

Size of territory	1.129.300,4 sq.km (source: World Bank, for 2021)
Size of population	115 Million (source: World Bank, for 2020)
Key exports	Coffee (\$860M), Oily Seeds (\$384M), Gas Turbines (\$328M), Vegetables (\$261M), Gold (\$194M) (source: OEC.world)
GDP	107,6 billion USD (source: World Bank, for 2020)
GDP per capita	936,34 USD (source: World Bank, for 2020)
Main Crops in order according to quality (in tonnes)	Maize, cereals, wheat, sorghum, taro (cocoyam), barley, sweet potatoes, sugar cane, millet, potatoes, broad beans (horse beans), bananas, coffee, beans, vegetables, chickpeas, cabbages and other brassicas, peas (FAOStat 2020)
For export in order according to value (in US\$)	Coffee, sesame, beans, soybeans, groundnuts, lettuce and chicory, onions, tomatoes, chickpeas, oilseeds, broad beans (horse beans), molasses (FAOStat 2020)
For internal consumption	Cereals, starchy roots, tubers (> 80% of the country's energy produced), pulses (10%) (Baye et al. 2019) – Numbers available for the period 2011-2015

Table 1: Basic facts about Ethiopia

Introduction

Ethiopia has two distinct geographical regions: the highlands and the lowlands. Traditionally, the more fertile highlands concentrated smallholder agricultural production and the socio-economic and political centers of the empire and later the Ethiopian state. The lowlands, due to the erratic rains, were scarcely populated and used predominantly by pastoralists and shifting cultivation. State presence was traditionally never strong in the lowlands (Gebresenbet 2016: 9). Different regimes have tried different land reform to increase their control over the lowland regions. When these failed, they sought to facilitate foreign land acquisitions and agricultural investments (Lavers 2016).

This section begins with a brief historical overview of these land policies, and analyses what the literature has to say on the effects of the more current phenomena of land grabs in Ethiopia. This is followed by an overview of Ethiopian land laws, the trend of land acquisitions and their impacts.

This review shows that actors can differentiate along the size of plots they acquire. For instance, the highland state elites and domestic investors tend to acquire smaller plots of land, while the diaspora and foreign investors acquire the larger plots (Rahmato 2014; Makki/Geisler 2011). It also shows that land has been expropriated in order to resettle people from more densely populated areas (Regassa et

al. 2019; Moreda 2017). Displacements are found to directly contribute to increased food insecurity (Eskeziaw 2020; Alanirew et al 2015; Lavers 2018; Tefera/Lu 2019; Makonnen 2018) and increased rural exodus (Regassa et al. 2019). As pastoralists were forced to settle in villages, the promised jobs did not materialize as they were not employed in the plantations, who chose to hire migrant rural labor instead (Regassa et al. 2019). These processes have intensified the breakage of social relations in the countryside, due to migration, the increased workload to provide for their livelihoods and the random placement of houses and distance from friends and family (Stevenson and Buffavand 2019; Wayessa 2020, Hajjar et al. 2019). Added to this, intensification of agriculture and smaller plots led to severe land degradation and smaller yields through the years (Bekele et al. 2020, Hajjar et al. 2019).

Historical Background of Land Governance

The issue of land management is of continuous importance throughout the history of Ethiopia, even though there was remarkable variation between different regimes. Until 1974, the time of imperial Ethiopia, the lowlands were considered personal property of the emperor and his family, who could distribute it at his will without consulting the people who lived in and used the land (Gebresenbet 2016: 10). After 1974, Mengistu's Marxist–Leninist military council (the Derg) established state land ownership through abolition of all forms of tenancy through the rural land reform reclamation of 1975. In the highlands, land was redistributed at a maximum of 10 hectares per family. In the lowlands, private farms became state farms, and land was redistributed, also without consultation of those who traditionally used the land (Gebresenbet 2016: 10).

The reform pushed small holders to join peasant associations where they had to decide on whether to enter into communal land use or to redistribute land among its members. It also involved a coercive North to South resettlement and villagization plans aimed at reducing demographic density in the North while at the same time suppressing cultural manifestations and ensuring food security. Given the abruptness of its execution, a disruption of the market ensued which resulted in less production and the increase in on-farm consumption (Ottaway 1977: 79). This was solidified by the experiences of famines in 1973 and 1984 that led to the death of more than 400,000 people. An armed uprising ensued against the state in the form of an alliance of ethno-nationalist movements - the Ethiopian People's Revolutionary Democratic Front (EPRDF) - that seized power in 1991 and eventually overtook the state; first as the Transitional Government of Ethiopia (TGE) and eventually as a federal republic in 1995 (Makki/Geisler 2011: 10).

In the backdrop of the end of the Cold War and efforts to chart its own path, the TGE embarked in the adoption of a structural adjustment program, in which farm

collectives were privatized and producer cooperatives were dismantled. While this was a significant departure from the socialist approach of the fallen Derg, the TGE also pursued state land ownership as reaffirmed in the 1995 constitution and the ensuing 1997 Rural Land Administration Proclamation number 89. As pointed out by Crewett and Korf (2008: 205), the TGE was composed mainly by the Tigray People's Liberation Front (TPLF), which was aligned through its adoption of Marxism-Leninism with the Derg. This alignment resulted in a fear of re-emergence of greedy monopolists resembling pre-reform landlords of the imperial regime who traded on surplus of the poor. It therefore sought to protect peasants from land alienating practices despite pressures from international financial institutions to do so (Crewett/Korf 2008: 205).

While the 1995 constitution affirms the right to obtain land without payment and the right to compensation and protection against evictions, it also prohibits sale and transfer of land. Similarly, the government proclamation no. 89 from 1997 reaffirms state ownership of land while allowing some room for regional states to formulate their own land policies. Therefore, while the new constitution aimed to prevent accumulation of land property by a few with the possible consequences of evictions, landlessness and rural-urban migration, it facilitated commercialization of smallholder agriculture and alienation of land from direct producers/local peasants through state monopoly (Makki/Geisler 2011: 14). In this way, Ethiopia's approach to land administration can be said to be a combination of elements of economic liberalization (efficiency) and state protection (opposition to land privation to ensure fairness) that translates to usufruct rights only for peasants as opposed to the rights over transfer, sale or mortgage (Crewett/Korf 2008: 207-208). While land registration, certification and titling carried out between 2003 and 2010 was a positive move, it was aimed at facilitating land management by certifying user rights as opposed to free hold titles that can be used as a collateral (Makki/Geisler 2011: 10). Consequently, despite intense debates on the fate of land management since the departure of the Derg, ambitions for land registration and titling were shattered with the state exercising power over the peasant associations. As a result, critics have often vehemently pointed to the violation of peasant rights through their denial to make independent decisions about their land.

The Trend of Land Acquisition

One characteristic of the Ethiopian case is that the state sought to invest in the agricultural sector through expropriation (Vhugen/Gebru 2013: 1-2). Practices of farmland allocation began in the 1980s and expanded between 2008 and 2011 and are still ongoing (Degife et al. 2018: 2-3; Rahmato 2014: 26). The conviction amongst Ethiopia's state members about the viability of commercial agriculture is

rooted in the country's experience of severe famines and hence their adoption of an Agriculture Development-Led Industrialization (ADLI) in the mid-1990s, particularly with the launching of the National Growth and Transformation Plan (GTP) in 2010 (Vhugen/ Gebru 2013: 1-2). ADLI was also aimed at retaining the workforce in rural areas to provide cheap labor in the agribusinesses (Ragassa 2020).

In the initial phases of the ADLI, i.e. roughly between 1995 to the dawn of the millennium, domestic investors were the main players and acquired relatively smaller land plots. The following years to around 2007, efforts to attract foreign investors bore fruits with the entry of foreign investors and members of the Ethiopian diaspora albeit domestic investors still play a significant role. Investments during this period led to a boom in the horticulture sector, especially by Dutch companies who exported cut flowers to Europe and elsewhere (Rahmato 2014: 28). Notably, more land was acquired during this phase than in the previous. These acquisitions happened mainly in the highland areas with significant infrastructure/near transport corridors given the perishability of the commodity in question (Makki/Geisler 2011: 11). In these highland investment zones, smallholder farmers were generally not alienated from their land given the existence of extensive reserves of state land and because their labor was vital (Makki/Geisler 2011: 11).

In contrast to the highlands, Ethiopia's lowland areas that constitute its periphery have often been perceived as 'unused' due to the high number of pastoralist communities there (Makki/Geisler 2011: 12; Vhugen/Gebru 2013: 3). The state encouraged large-scale agricultural investments in these areas particularly through its 2005 "Poverty Reduction Strategy Paper" (PRSP), produced as a condition of the World Bank for loans for investments in infrastructure. These lowlands areas have been not only the stage of Ethiopia's land grabs between 2008 and 2011, but also the site of resettlement of people from other densely populated areas of the country (Regassa et al. 2019: 939-940; Moreda, 2017: 700). The post 2008 opening up to larger scale land investments was aimed at attracting foreign capital especially from East Asia and the Middle East with the interest of growing food crops such as rice, oil, soya beans, castor and jathropa (these last two for biodiesel), commodities that are mostly exported and do not help promote food security (Rahmato 2014: 27; Abbink 2011: 519). According to Rahmato (2014), Indian investors have dominated the scene in terms of number of investors as well as with regard to the size of land acquired. By 2011, 25-30 agricultural investors from India held about 450,000 to 500,000 ha of land in different parts of the country (Rahmato 2014: 32).

These are only rough estimates and due to conflicting accounts, it is difficult to tell exactly how much land has been acquired by international investors so far⁵. Facilitated by the narrative of Ethiopia's lowlands being pristine and 'empty' yet resource-rich, it is these pastoralists' lowlands where a significant amount of land has been leased out by the state's highland elites. The type of land ranges from cropland, pasture, woodland forests, rangeland and wetlands to wildlife habitats and national parks (Regassa et al. 2019: 938), with the Gambella and Benishangul regions particularly targeted (Rahmato 2014: 31).

Impacts

Land grabs in Ethiopia has generated much controversy particularly due to its impacts on targeted communities. Examples of negative impacts are the forceful pushing out of pastoralists and other indigenous groups from their land (Tefera/Lu 2019:3; Lavers 2018: 472-483; Makonnen 2018: 160), the promotion of a policy of villagization (Gebresenbet 2016), and increased food insecurity (Eskeziaw 2020: 16; Moreda, 2017: 704-700; Alamirew et al. 2015:1129). Anchored in the 2005 Land Expropriation Proclamation, the state holds powers to expropriate land when it deems necessary for public use, which has included transfer of communal land to private ownership (Proclamation No. 455/2005 and Proclamation No. 456/2005) (Ragassa, 2020). Since 1991, it has facilitated the appropriation of millions of hectares to investors at cheap prices without the consent of communities. This expropriation is facilitated by a view that peasants and pastoralists are a hindrance to industrialization, especially due to their shunned lifestyle (Regassa, et al. 2019: 936). Given that more than 80% of Ethiopians live in rural areas, this has had major consequences such as increased rural–urban migration to cities such as Dire Dawa, Harar Benishangul-Gumuz and Gambella.

Ethiopia's state-led development has prioritized infrastructure development and economic growth instead of addressing food security. Yet, paradoxically, Ethiopia is prone to malnutrition and famine outbreaks and is often dependent on food aid. Additionally, land acquisitions are often accompanied by reduced land fertility due to intensive cropping and diversion of other resources such as water that sustain local communities for their livelihoods (Abbink 2011: 520). Poorly done or non-existent environmental impact assessments have also added to the increasing instability of the ecosystem (Rahmato, 2014: 27; Ango 2018: 7-15). Such concerns

⁵ According to the Land Matrix (with the problem mentioned above), around 881 576 ha have been negotiated in Ethiopia, which accounts for 90 deals. Not all deals have been realized, so within this number the same area that has been negotiated with different investors are counted again (The Land Matrix 2023)

have generally led to opposition of large-scale land acquisition projects by host communities (Rahmato, 2014: 27; Tefera/Lu 2019: 6-10). Notwithstanding the environmental effects, the promises of compensation and alternative livelihood opportunities such as employment opportunities are often not fulfilled, leading to increase poverty and reliance on food aid (Abate 2019: 92).

One project that was implemented between 2011 and 2014 in the South Omo zone of the Southern Nations, Nationalities and Peoples (SNNPR) for example, was characterized by villagization/i.e. the forced settling of large numbers of agro-pastoralist households into sedentary agriculture lifestyle to create space for the Omo Sheleko Agro-industry. This was done with the support of the Ethiopian state and financed from the World Bank. The same company had led to displacements and diversion of the Woyito river back in the 1990s on which the agro-pastoralists communities depended for the growth of their maize and sorghum. Other cotton companies, namely Nasa and Sagla Cotton farms later came into the picture and acquired more than 3.000 hectares of land in that area also led to displacements. Furthermore, it was estimated at one point that the Ethiopian Electric Corporation's (EEC) Gilgel Gibe project would affect hundreds of thousands of people from the indigenous population and whose livelihood is tied to lake Turkana (Eskeziaw 2020: 17). These companies also contracted migrant workers and justified by alleging that local Tsemai pastoralists know little about farming, which is shown to be not true because pastoralist communities often plant crops for their food and cattle (Regassa et al. 2019: 939-941-942, Abbink 2011).

Regarding food security, the literature has shown that the new settled villagers depended on food aid because they were unable to feed themselves. More often than not, the plots they receive are too small and the loss of communal grazing grasslands leads to decreasing number of livestock (Stevenson/Bufavand 2018; Hajjar et al. 2020). They also reported broken social relations, as they had not choice of whom they had for neighbors and were often allocated houses far from their families and friends, changing their routines (Stevenson/Bufavand 2018: 118-124). These negative impacts were particularly felt by women, due to the increased workload that befell on them. Water and firewood sources became more distant, so women had to spend more time gathering them. Household responsibilities also increased because male members now had to migrate to make up for the lost earnings (Hajjar et al. 2020).

Similarly, a household survey conducted in 2019 in Oromia and Afar states that host the Metehara, Tendaho and Kesem sugar companies, severe land degradation had been experienced by 75% of the 866 households surveyed with forestland and grasslands having been the most degraded. Among other findings, the survey also showed that 55.8% of the households lost their land while 86% experienced a de-

cline in crops and livestock productivity as a result of land degradation (Bekele et al. 2020: 782-786). In the same Oromia region, another analysis showed loss of land-based social relations and a decline in crop production and animal husbandry given that leased land were customarily used by communities for crop cultivation and livestock grazing (Wayessa 2020: 4). In Gambella, a study on land use patterns showed that agricultural activities had encroached on tropical grasslands and forests especially since the year 2000 and by large-scale farming practices. Gambella and areas around it are particularly attractive to commercial farming due to their rich bio-diversity and pristine nature. These activities also affected Gambella National Park – the largest in Ethiopia (Degife et al. 2018: 1-3).

It is therefore fair to conclude that LSLA has in the past years become a major cause of social conflict in Ethiopia both in the pastoralists lowland as well as the agrarian highlands resulting in livelihood disruptions, migration and environmental degradation. Violent incidents as a way of resisting these various trajectories of land and lifestyle transformations by affected communities have also been recorded in areas such as Gambella. Other impacts coming from the large-scale projects themselves such as poor performance, low level of productivity compared to peasant farmers and low level of farm expertise (despite having been embraced for the opposite effect ironically). These challenges emanate from the approach of projects' implementation such as the failure to conduct environmental impact assessments, rush to generate quick outcomes and most importantly the exclusion of local communities with expertise of their ancestral land (Rahmato, 2014, p.35-39).

Case Study II: Mozambique



Political map of Mozambique (public domain)

Size of territory	786.380 sq.km (source: World Bank, for 2021)
Size of population	31,26 Million (source: World Bank, for 2020)
Key exports	Raw Aluminum (\$1.38B), Coal Briquettes (\$963M), Electricity (\$310M), Raw Tobacco (\$287M), Petroleum Gas (\$281M) (source: OECD world)
GDP	14,02 billion USD (source: World Bank, for 2020)
GDP per capita	448,61 USD (source: World Bank, for 2020)
Main Crops in order according to quality (in tons)	Cassava, sugar cane, maize, bananas, tomatoes, sweet potatoes, beans, potatoes, coconuts, pulses, vegetables, onions, tobacco, sorghum, rice, fruit, sesame seed, cashew nuts (FAOStat 2020)
For export in order according to value (in US\$)	Tobacco, sesame, cashew nuts, sugar raw centrifugal, bananas, oil, bran (wheat), soybeans, beans, cotton lint (FAOStat 2020)
For internal consumption	Cassava, maize, rice, groundnuts, pulses (wheat, millet, sorghum) (USAID 2019)

Table 2: Basic facts about Mozambique

Introduction

In Mozambique frequent internal migratory movements since colonial times have led to overlapping conflicts over land, to which the recent land grabs are but another layer. The land law of 1997 that was originally designed to formalize traditional communities' right to land, has been slowly modified to reassert state control over already contested land allocation. As a consequence, traditional communities are frequently dispossessed of their lands with little or no compensation. Rural livelihoods are interrupted, but the coping mechanisms with which peasants rely on for their survival have yet to be explored.

In this section we will provide a brief overview of historical land policies in Mozambique, followed by the land laws created since independence, the current trends of large-scale land acquisitions in the country, as well as its impacts.

Historical Background of Mozambican Countryside

In colonial Mozambique, control over land meant control over labor. Whoever administered the lands had the power to extract taxes from the population. In a first moment, taxes were paid in kind, in the form of agricultural output (the prazos). By the 1890s, taxes were paid through money and forced labor due to an increase in

labor demand for plantations, the building of infrastructure, and police services (Newitt 1995: 404).

In the same period, the Portuguese colonial state handed over the administration of 6 of the current 10 provinces⁶ to chartered companies, who exercised the right to establish sub-concessions of land to foreign-owned plantations, white settler farms, mines, as well as collect taxes, build railways and irrigation infrastructure and provide forced laborers for these economic endeavors (Bussotti 2020: 41). These policies led to many African populations not being able to work their lands (Isaacman 1996) and consequently migrating from one region to another in order to avoid paying these heavy labor taxes (Newitt 1995: 414).

This division of land and the migratory tactics as a form of resistance led to conflicting claims over land already during colonial times. The post-colonial state that emerged after 1975 added to these conflicts by determining that all land in Mozambique was now property of the state. The leaders of the independence movement viewed rural development as a matter of socialization of the countryside in the form of collective farms to satisfy internal consumption and earn export revenues. These state farms occupied the best lands, close to infrastructure, but the state did not invest sufficiently in them (Walker 2020: 320, Bowen 2000). Because of this, farmers found it more profitable to return to subsistence farming (Pitcher 2000: 10; Bussotti 2020: 44)⁷. The concomitant 16 years of civil war and droughts led to increased migrations and the destruction of the country side's economy and land tenure security.

In the 1990s, when the civil war ended and the Peace Agreements were signed, about 1.7 million people were displaced to neighboring countries and 3.2 million people were displaced internally (Hanlon 1996: 16). Many people of different social strata chose to not return to their places of origin in order to benefit from the advantages these new localities had, such as better access to markets, roads, and infrastructure that were not ruined by the war. These overlapping land claims led to much confusion in the countryside and paralyzed rural production (Walker 2020: 318).

Financial aid to the ailing Mozambican State was agreed under the conditions of the structural adjustments. These meant, for rural development, the abandonment of state farms in favor of private enterprises, which led to another bout for land

⁶ These were: Manica, Sofala, Zambézia, Tete, Niassa and Cabo Delgado.

⁷ A caveat must be made, as, according to Smart and Hanlon (2014), some collective farms were productive, and this was mostly had to do with management capacity.

conflicts and the necessity for a new land law to bring order and tenure security in the countryside (Bussotti 2020: 45).

Land Laws

In 1979 the newly independent nation passed a land Law, in which the state was the sole owner of all Mozambican land. All land became property of the state and the state the sole authority over all land matters. It could expropriate land as it wished in order to fulfill its policies, as in the case of the state farms. Traditional authorities were stripped of any authority over land due to their perceived cooperation with colonial authorities (Kaarhus/Dondeyne 2015: 200).

The end of the civil war and the ensuing confusion in the countryside led to the necessity of a new land law that would regulate and secure tenure. The 1997 land law allowed individuals and communities to gain a title for the land they occupied and then use the land as they saw fit, be it developing or renting it out (Hanlon 2004: 603). It recognizes customary tenure and gives a role to community (traditional) leaders in solving conflicts over land, while the state's role was more related to recognizing these rights. It also sought to provide equal access to land for both men and women (Kaarhus/Dondeyne 2015: 196).

Communities can formalize their land use rights by delimitating and demarcating their land, and obtaining a title of use (Direito de Uso e Aproveitamento da Terra⁸ - DUAT) (Walker 2020). The DUAT not only seeks to protect local communities' rights to the land they occupy, but also to create a safe legal system that encourages investments. For this purpose, the Land law provides that the state can lease out land to individuals as well as to companies. (Hanlon 2004: 605). Subsequent reforms of the constitution and the land laws have increased the importance of economic activities in rural areas, and the state's role in the determination of land rights, passing from merely recognizing land use rights, to approving rights of use (Kaarhus/ Dondeyne 2015: 200).

To protect and prioritize traditional community spaces, the Mozambican Land Law requires that third parties/investors engage in consultations with the target community and enter into an agreement on land allocations. Nonetheless, public consultations often fail to happen or are rushed (Matavel et al. 2011; Borrás Jr. et al 2011; Hanlon 2011), severely limiting the effectiveness of the land law (Nhan-tumbo/Salomão 2010). Those with political connections and money have easy access to the better lands, while those without them are left with the less fertile and

⁸ In English this refers to the right to use and to benefit from the land.

fragmented plots (Felipe/Norfolk 2017; Porsani et al. 2017), increasing their food vulnerability (Cotula/Vermeullen 2009; German et al. 2013).

The Trend of Land Acquisition

The Mozambican state has lacked a consistent policy for rural development to lift the almost 70% of its population that depends on agriculture for their livelihoods (ILO 2021), but in 2021 produced only 21% of its GDP (INE 2022). The World Bank's recommendation of large-scale farming as a tool to overcome poverty was adopted by the Mozambican government and has contributed quite heavily to land grabs in the country.

In Mozambique, these new processes of land grabs are layered onto already existing claims to land, as the many displacements during the colonial and civil war eras have not yet been completely settled (Walker 2020: 319; Bruna 2019). Pre-existing domestic inequalities have an enormous impact on the outcomes of land deals. Because of the necessity of the state's approval of foreign investments on land, state officials and elites have access control over land and resources, and have become necessary intermediaries between the international and local spheres (Fairbairn 2013; Bruna 2019; Beekman/Veldwisch 2012: 183; German et al. 2013; Milgroom 2015; Walker 2020). Local actors are another layer of gate-keepers of outside access to land and controlling the regional/local distribution of land, because of the land law provisions that require community consent (Kaarjus/Dondeyne 2015: 212; Milgroom 2015).

International large-scale land investments in the country have concentrated on the production of exportable commodities such as timber, paper and carbon credits, sugarcane and jatropha crops for biofuels, with the EU being one of the biggest investors, next to EU member countries (Hanlon 2011; Borrás Jr. et al. 2011; Fairbairn 2013: 336). These crops were introduced to be used in marginal lands, but to be commercially viable and competitive they need fertile soil with good irrigation systems, and end up competing for space with food crops (Lunstrum 2016, Nhandumbo/Salomão 2010, Hanlon 2011; Matavel et al. 2011; Beekman/Veldwisch 2012; Porsani et al. 2017), worsening food security prospects.

The state granted between 2004 and 2009 about 3 million hectares⁹ to investors, but half of the land was under-used or never developed (Matavel et al. 2011). Many investors fail to raise the capital needed for the development of their activities or just maintain ownership of land as a speculative asset (Akram-Lodhi 2012). Mean-

⁹ This is an area of the size of Belgium.

while, peasants are dispossessed of their lands, but the promises of compensation made to them are almost never materialized.

In general, large-scale land acquisitions include very minimal labor needs and very few people have permanent jobs at the new plantations, with the majority of the population left dependent on seasonal jobs with little or no compensation for the lost livelihoods or land or an alternative to it (Lunstrum 2016; Borrás Jr. et al. 2011; Felipe/Norfolk 2017, Porsani et al. 2017). The land they are relocated to is often further away from water sources and markets, making agriculture an even more expensive, time-consuming and difficult activity to carry out (Felipe/Norfolk 2017). Frequently, the dispossessed population are relocated to other communities, or to an area where people dislocated from other projects are being relocated to, with the effect of increased conflicts over land (Lunstrum 2016). Despite the few descriptions of the problems that people face when they are displaced, the ways in which they cope and what networks, resources or even government aid they count on to deal with this situation is not described in the literature.

The World Bank has done a follow up study in Mozambique after advocating for large-scale land investments, on the spillover effects of these on smallholders. Using data from 2012-2014, it found that even though there was some job creation in the area adjacent to a newly established crop perceived wellbeing decreased within a 25km radius (Deininger/Xia 2016). The authors argue, however, that negative short-term effects do not imply negative long-term effects and that large farms should be offered technical improvements and in the long run would bring the foreseen positive effects advocated by the bank (i.e., provide local people with new technology, access to credit, inputs and labor markets). The goal is to increasingly commercialize agriculture and land relations (Chambati et al 2019,). However, how technologies and credits for the development of plantations can be transferred to smallholders is an open question.

Contract farming (though not new in Mozambique) arose as a more ethical alternative to large scale land acquisitions, being considered an “inclusive business model” within the impact investment paradigm (Veldwisch 2015: 12). In this model, the buyer establishes the quality of the crops and price with the farmer, who then plants the crop in their plot of land. This model is deemed more ethical because in theory, the farmer can negotiate better prices and works for himself. However, when analyzed more closely, contract farming was found to have similar impacts of land grabbing on the livelihoods of smallholders by favoring bigger farmers and relocating smallholders from fertile areas, accelerating social differentiation (Tamura 2021; Veldwisch 2015).

Impacts

Not all people are affected in the same way by large-scale land acquisitions (Bruna 2019; Borrás Jr/Franco 2012: 46). The victims of land grabs form a diverse group with different levels of social differentiation between them. Consequently, they have different access to and control over land. Some may choose to engage with the incoming investment projects, while others reject it. These calculations depend on the historicity, local networks, and power balances in each village (Tamura 2021: 8). For some, this process allows for asset accumulation (by those with the means to do it) and for others less fortunate, land becomes expensive and hard to get, often becoming too small and fragmented to meet food needs (Felipe/Norfold 2017). This parallel process of accumulation and dispossession accelerates social differentiation in the rural areas (Chambati et al. 2019).

The matter of women's access to communal land is illustrative of this point. The land law formally recognizes the equal rights of men and women. In practice, however, women are excluded from traditional authority spaces (Matavel et al. 2011; Kaarhus/Dondeyne 2015) and are increasingly marginalized in the demarcation and distribution processes and in the control of land (Walker 2020; Chambati et al. 2019), leaving them with no means support their families or even to abandon agriculture altogether (Matavel et al. 2011).

Resistance to land grabs take many forms. Beekman and Veldwisch (2012) provide an example of how a smallholder community in Munda-Munda ,in Zambézia, defended their land with the help of an NGO. The community shifted the strategy from a legal discussion of land possession, to the efficient and productive use of land. With the use of tractors, fertilizers, improved seeds, investments on infrastructure such as irrigation, and commercialization of production the community was able to improve and increase their production and thus combat the state's claim of marginal, unused land.

Other forms of resistance can be seen as uncontrolled burns in forest plantations, relocation of houses to areas destined for foreign project to demand compensation, and complaints when firms fail to deliver the promises (Fairbairn 2013). National and international civil society organizations working with peasants help amplify their struggle, which leads to policies being redesigned to accommodate these demands (Monjane/Bruna 2020).

The effectivity of these resistances, however, depends on the level of state presence in the area. Bussotti (2021) claims that in southern Mozambique, the Frelimo stronghold, protests against large-scale land acquisitions and dispossession are often left unheeded, while in the central and northern regions, areas in which

Frelimo presence is not strong and often contested, protests are taken more into consideration.

As we have seen in this case study, despite very progressive laws to protect communities' rights to land, the power structures around the granting of access to land effectively erases these protections, though not without resistance. Large-scale land acquisitions have failed to integrate smallholders into the economy as envisaged by authorities, displacing many families and increasing social differentiation in the countryside. There is regional imbalance in the effectiveness of resistance due to power imbalances of the state.

Case Study III: Zambia



Political map of Zambia (public domain)

Size of territory	743.390 sq.km (source: World Bank, for 2021)
Size of population	18,38 Million (source: World Bank, for 2020)
Key exports	Raw Copper (\$5.77B), Refined Cooper (\$2.03B), Gold (\$757M), Copper Ore (\$195M), Raw Tobacco (\$185M)
GDP	19,32 billion USD (source: World Bank, for 2020)
GDP per capita	1.050,92 USD (source: World Bank, for 2020)
Main Crops in order according to quality (in tons)	Sugar cane, cassava, maize, vegetables, soybeans, wheat, sweet potatoes, groundnuts, fruits tropical, potatoes, sunflower seed, millet, seed cotton, onions, rice (FAOStat 2020)
For export in order according to value (in US\$)	Tobacco, sugar raw centrifugal, maize, soybeans, cotton lint, cereals (FAOStat 2020)
For internal consumption	Cereals, mainly maize, (cassava, millet, and sorghum in certain regions), sweet potatoes and rice in urban areas (FAOStat 2009: 21 ff.) Numbers for 2001

Table 3 basic facts about Zambia

Introduction

Though most of Zambia's population occupy the countryside, copper mining has dominated its formal economy and mode of world market integration. Land has since colonial times been divided into land for traditional communities (which comprise 94% of the land in Zambia) used mainly by smallholder farmers, and crown (later state) lands, where mining activities and commercial agricultural enterprises have development.

The most remarkable feature in the case of Zambia is the rise of the middle-size farmer after the new 1995 Land Act, which turned land into a commodity and encouraged the titling of land in state as well as community lands. The majority of the owners of these middle-sized farmers are urban dwellers, who have better access to the state authorities and are able to influence agricultural development policies in their favor. Like in our other case studies, land acquisitions do not affect all in the target location the same. The frequent dispossessions without compensation and loss of livelihoods of smallholders is a phenomenon that is also observed in Zambia, with women and youths often losing the most.

In this section we will provide a brief overview of historical land policies in Zambia, followed by the land laws created since independence, the current trends of large-scale land acquisitions in the country, as well as its impacts.

Land Governance under a historical perspective

Under British rule, the lands that now comprise Zambia were divided into three different types of lands: crown lands (most fertile and mineral rich lands, urban areas), reserves (owned by Africans) and trust (public) lands. Crown lands and all those who lived there, settlers and Africans were administered under British law. The titling system introduced by colonists strengthened white settlers, who were able to use land as collateral for obtaining capital, and thus were able to integrate their agricultural production into the markets (Mushinge/ Mulenga 2016: 10).

Reserve lands were carved around crown lands to provide living space for those displaced and labor reserves for white settler farms in crown areas (Brown 2005:83). Alongside the trusts, reserves were governed by customary communal rules. The British assumed that chiefs were responsible for the administration of these lands and granted them control over land use and allocation (Brown 2005: 84)

After independence in 1964, under the new socialist regime of “United National Independence Party” (UNIP), all crown lands became state lands, vested in the President (Muschinge/ Mulenga 2016:11). Reserves and trusts, which comprised 94% of all lands became customary land, maintaining the administrative division created by the colonial government. In 1975, UNIP carried out a land reform which converted freehold tenure into statutory leasehold in state lands (Chitonge et al. 2017). Only buildings, and agricultural infrastructure were attributed intrinsic value and could be bought and sold, effectively suppressing the land market. In 1985, the government passed a new legislation forbidding acquisition of land by foreigners, except when the president allowed it (Brown 2005: 85).

The new and current Zambian Constitution of 1991 kept the provision that all land is formally owned by the state, vested in the President. This period of change, from a socialist to a market-based regime saw international donors lobbying for easing of restrictions to international investors and changes in the land acquisition, which culminated in the 1995 Land Law (Nolte 2014, Chu 2013b; Brown 2005: 85). It repealed the 1975 land act and turned land into a commodity. Now, even in customary areas land can be bought and sold freely to facilitate foreign investments and ownership in mining, agriculture and tourism sectors (Horne/Mittal 2011/12).

The Trend of Land Acquisition

Zambia’s political stability and ample land and water has made it an attractive place for investors looking for land. With only 14% of its land under cultivation, the World Bank deemed too much land was idle and its potential unrealized (Chu 2013a). Customary land makes up between 80-96% of the land base, and most of

the Zambian population live in these rural traditional communities (Horne/Mittal 2011, Nolte 2014). Since the Land Act of 1995, the amount of traditional land has been steadily declining. This is due to the fact that “legality”, that is, holding a title to land, has taken precedence over “social legitimacy” of customary use. In the ever-increasing cases of conflicts over land tenure security of customary users has steadily declined (Mushinge/Mulenga 2016, Brown 2005: 87), to the benefit of local, urban elites and foreign investors (Chitonge et al. 2017). Individuals or companies who acquire customary land from chiefs have the opportunity to convert it to state land (obtain a title) and effectively privatize it, extinguishing control of the traditional chief over this area (Horne/Mittal 2011). The law has no provision for converting back privatized land to customary rule, so once the landholding is consolidated, land is unlikely to return to the hands of smallholder farmers (Chu 2013b).

In Zambia large-scale land acquisitions make up only 10.9% of all farmland transfers (Jayne et al. 2014). Medium-sized farms, ranging from 5 to 100 hectares account for over 50% of total farmland in Zambia and is rapidly expanding. (Jayne et al. 2016). Of these medium-scale investors, the majority are urban-based professionals (often in the public sector), who finance farming ventures with non-farm incomes. Jayne et al. (2016) estimate that up to 35% of total agricultural land are owned by urban households. As they mostly remain in urban areas, few of them cultivate their land. A minority of medium-scale farmers started out as smallholders, and their farms are generally smaller than their urban counterparts, but with more cultivated areas (Jayne et al. 2014). Due to their political connections, these urban elites are able to lobby and influence agricultural policy and thus are more capable of participating in broader processes of agricultural development (Jayne et al. 2016; Sitko/Jayne 2014). The consequence of this process is the gentrification of the countryside through the rise of the medium-scale farms (Chimhowu 2020: 901). Despite these findings, there is little in the literature about these middle-scale farms.

International investors are more scrutinized by the international press, NGOs, peasant movements, and academics. This scrutiny has some impact on how investors are viewed and how they want to be perceived and, consequently, with what types of projects they engage with, though they fall short of stopping land grabs (Salverda 2019; Rémy/Cochet 2020).

The change of land possession is, however, not only shaped by domestic interest. By controlling funds and direct support to investors, donor countries such as the US, UK, Germany and Sweden help shape policy pathways for poverty reduction and rural development, having an impact on how land acquisitions unfold and their impact on smallholders (Manda et al. 2018; Manda et al. 2020a). The framework of

these policies supports the further commercialization of land to increase productivity (Jayne et al. 2014). However, Manda et al (2020a) have shown that even in sugarcane out grower schemes, deemed a more ethical alternative to large scale land acquisitions, the presence of agribusiness and their control over resources and production chain systems effectively limit smallholder participation in the production of chain value commodities. The integration of farming into global value chains entails specialized production knowledge which smallholders often do not have and consequently lessen smallholder interaction with these crops and chains (Manda et al. 2018). The inclusion of smallholders is dependent on the relations between investors, donors and public actors that shape agribusiness in Zambia (Manda et al. 2020b). These processes are contingent on national land politics, political parties, state and customary offices and their abilities to harmonize policies and institutional processes (Widengård 2019, Manda et al. 2018). Despite all external influences, national actors and politics are a defining factor in land grabs because they serve as intermediaries to land access (Manda et al. 2018).

Salverda and Nkonde (2021) point to the practical limitations of large land acquisitions. According to Nolte (2014: 702), fifteen foreign investment projects sought to farm 385,519 ha before 2014 in Zambia, but only 24,934 ha were in fact under production that year. Reasons for underperformance vary from chaotic land administration to difficulties in financing investments (Salverda/Nkonde 2021). Delays in obtaining the proper tenure agreement and land titles leads to delays in land clearance and cultivation often leave the land open to “encroachment” by peasants, who perceive the land as available for use. The longer the land is left undeveloped, the longer it takes to find investors or to sell the land due to pressures from rural residents who occupy it (Salverda/Nkonde 2021).

Impacts

The impacts of large-and-medium scale land acquisitions on smallholders’ livelihoods in Zambia are very mixed. There are different patterns of accumulation and class formation and differentiation, depend on the nature of the local agribusiness (Matenga/Hichaambwa 2017). Institutional arrangements, types of crops cultivated, and technology applied in production together determine the quantity and quality of jobs and how labor is sourced (Matenga/Hichaambwa 2017; Li 2011). Commercial and contract farming tend to produce more local economic linkages while plantations are more “enclave” investments, producing mostly low quality and mostly casual jobs (Hall et al. 2017). Plantations tend to be more related to displacement and dispossession of existing farming communities.

Although there is a legal framework which prescribes consultations with local communities, environmental impact assessments, and protection of traditional

land users, these provisions are not well enforced, especially since traditional chiefs and small holders know little about the laws (Mushinge/Mwando 2016). Hence, traditional land users are left with little protection or compensation (Horne/Mittal 2011; Nolte 2014), and are often subjected to evictions, elite-capture, enclosure of commons, concentration and fragmentation of land (Mushinge/Mulenga 2016). Impacts on livelihoods range in varying degrees from loss of land and livelihood without compensation to greater employment opportunities and wages, improved infrastructure and knowledge transfer (Matenga/Hichaambwa 2017; Nolte 2014; Horne/Mittal 2011). However, even positive outcomes have caveats, for labor laws are often not respected, jobs created are largely short-term and low income, and knowledge transfers are questionable. As Nolte (2011) wrote, it is not clear how large-scale mechanized agriculture can trickle down to a farmer that uses very simple technologies.

The process of social differentiation is particularly pernicious to women and youths. Customary land is not only a source of farming plots, but also provides access to resources such as water, firewood, grazing pasture, forest products and production of charcoal for energy (Chu 2013b). The alienation of these spaces, which does not necessarily imply the displacement of people, restrict their access to their complementary sources of income, impacting their daily routines, especially of women. They often have to spend more hours walking around enclosures to reach water sources, wood and fodder. More time might be spent to get to schools, clinics, and markets (Horne/Mittal 2011).

The impacts of displacement and land enclosure build on each other to increase food insecurity. It interrupts the growing season and when infrastructure is not in place interrupts also access to education and health services. People are often forced to migrate to find wage employment, either in towns, mines or other farms. This shift towards wage employment leads to changes in community and family structures, social problems, human trafficking, increase in HIV/AIDS and lifestyle/dietary changes (Horne/Mittal 2011: 44), especially in host communities. Women are often paid less than men and are less protected by labor laws. They tend to bring their children with them, who end up working but receive no pay.

To conclude, in the case of Zambia large-scale land acquisitions are actually not the biggest challenge rural communities face. The growing preference of the security the titling system brings is wresting land away from smallholders and traditional communities increasingly towards urban-based middle-scale farms. The legal provisions in place are not enough protection to these traditional communities, especially because they are not knowledgeable of the law. As in our other cases so far, there is need of more research into the coping mechanisms of the affected communities.

Size of territory	227.540 sq.km (source: World Bank, for 2021)
Size of population	31,07 Million (source: World Bank, for 2020)
Key exports	Gold (\$5.93B), Crude Petroleum (\$2.71B), Cocoa Beans (\$1.28B), Cocoa Paste (\$414M), Coconuts, Brazil Nuts, and Cashews (\$361M) (source: OEC.world)
GDP	72,35 billion USD (source: World Bank, for 2020)
GDP per capita	2.328,53 USD (source: World Bank, for 2020)
Main Crops in order according to quality (in tons)	Cassava, yams, plantains, maize, palm fruit oil, taro (cocoyam), rice, cocoa beans, oranges, pineapples, rice, groundnuts, coconuts, tomatoes, sorghum, cow peas, beans, soybeans, millet, sugar cane (FAOStat 2020)
For export in order according to value (in US\$)	Cocoa beans and paste, cashew nuts, cocoa butter, oil vegetable origin, palm oil, bananas, mangoes (mangosteens, guavas), pineapples (FAOStat 2020)
For internal consumption	Rice and corn (rice consumption is estimated at about 35kg/year, rice consumption has increased), in northern Ghana millet and sorghum (USDA 2018) – Numbers for 2016-2017

Table 4 basic facts about Ghana

Introduction

Ghana presents a very different context from our previous cases. The British colonial rule was not able to alienate land from the African chiefs, and created a dual legal system for land administration, one formal one which encompasses state lands, the traditional tenure system, administered by the traditional authorities. This system persists up to this day, with control over land being a site of economic and political power and therefore an uneven arena of struggle for power between traditional and state authorities. Traditional chiefs control 80% of the land and dispose of discretionary powers regarding accepting deals with international investors (Aha/ Ayitey 2017), often to the disadvantage of their communities and increasing social divisions (Kirst 2020). Yet, even in this different context, the outcomes for peasants are not that different from the other cases presented in this review. Land clearings and dispossessions tend to affect women and youths more severely because their livelihoods have been compromised and alternatives or compensations are few if at all available.

The following sections comprise the historical background of land governance and laws in Ghana, followed by the trends in land acquisitions and their impacts.

Historical Background of Land Governance and Laws

Land tenure systems in Ghana is a subject that dates back to the 1890s when the British colonial government introduced the Crown Land Bills (1894) and its Amendment (1897) to take control of all land that was not cultivated or occupied (Kugbega 2020: 4). In this way, the British sought to take control over the forests and mineral deposits. The move was strongly opposed by the African educated elites, politicians and traditional rulers for fear of possible land dispossession and disruption of smallholder production systems (Fold/Whitfield 2012:12; Amanor 2005). Consequently, the British colonial government dismissed the Crown Lands Bill and created a land use system based on both customary and formal constitutional law which is still persists today (Aryeetey 2007; Kugbega 2020: 4). As such, only about 20% of Ghana's total land area is overseen by the state, the remaining 80% are held by customary landowners. They comprise families, clans and traditional authorities (Kasanga/ Kotey 2001:13, Aubynn 2009:65).

Control over land and land allocation is thus the base of economic and political power of traditional chiefs (Kugbega 2020: 4). Article 36(8) of the 1992 Constitution of Ghana explicitly recognizes the jurisdiction of traditional rulers to administer and oversee land affairs. Their authority and status are independent from the government and are based on traditional laws and norms (Elhadary/ Obeng-Odoom 2012:63). By law, traditional authorities are fiduciaries who have an obligation to act for the benefit of their communities. In the vast majority of cases however, the reality appears to be quite different. In the findings of Ubink/Quan (2008:216) and Berry (2017:117), the performance of this role is marked by low accountability, distrust, limited compensation opportunities as well as inefficient and unequal distribution of revenue for community development projects.

To counter this, the state has embarked on a long process of land reform with multiple programs to push for the formalization of land rights. In 1999, the National Land Policy was introduced, the first land policy in the country, and later the Land Administration Act in 2003 to operationalize the land policy (Elhadary/ Obeng-Odoom 2012:63). These reforms seek to provide tenure security by decentralizing land governance under the Lands Commission. On the one hand the Lands Commission unified different governmental bodies that dealt with land under one institution, becoming the one body responsible for all things land. On the other hand, it has regional officers who work together with land owners, chiefs and customary land tenants to create knowledge about land, facilitating the acquisition of land titles and deeds and making it more transparent who holds tenancy where. In this way the documenting of land deals is thought to become more effective to better attend local needs (Biitir et al. 2017: 402). It is an attempt by the government to increase statutory authority over land administration (Kasanga 2009). At the same

time, due to its weak management it is also a victory of traditional communities in asserting their authority over lands, as they play a significant role in the information gathering and management. (Bitir et al. 2017: 403). The result of this is a hybrid system of land tenure, which does not provide increased protection to the poorer customary tenants nor poorer urban dwellers (Kasanga 2009).

The trend of land acquisitions

Prior to the surge in land deals in 2007/2008, large-scale land acquisition or land grabbing is said to have been going on in Ghana, especially in the mid-1990s following economic and political liberalization (Cotula et al., 2004: 912). In recent years Ghana has become one of the destinations for large scale land deals in Africa attracting high rates of foreign investments, especially for biofuels (Suhayini et al., 2018: 1122; Boamah/ Overå 2016; Nyari 2008). In a country where more than half of its population is engaged in agriculture (Aha/Ayitey 2017:49), Ghana is at great risk of the effects of the ongoing land rush activities. Land grabbing in the country has seriously threatened the rights and livelihoods of farmers who rely on communal land for their survival (Agbley 2019:155, Nyantakyi-Frimpong/ Kerr 2017). In a similar vein to our other case studies, most of arable land have been acquired in areas mainly inhabited by smallholders who struggle with poverty and food insecurity (Boamah 2011, Yaro/Tsikata 2014:203). Thus, it's worth noting that the Ghanaian context sheds light not just on the acreage of newly acquired land, but also on its growing impact on rural populations.

Though it is difficult to account for the exact size of land that has been grabbed so far, a number of studies suggest that traditional authorities, family heads, together with government allocated in the years 2004 to 2010 between 8.900 and 10750¹⁰ square kilometers of land for foreign-based investments throughout the country (Cotula et al. 2004: 906–910, Cotula 2012: 43, Cotula et al. 2009: 42, Friends of the Earth Europe 2010: 6, Schoneveld 2011 as cited in Nyantakyi-Frimpong/Kerr 2017: 423). Markedly, the size of land leased or sold out by the government to foreign investors is mostly larger than that which is given to domestic investors. This has often due to the belief that foreign companies have more capital and technology than domestic companies to carry out successful projects (Scoones 1998, Ayelazuno 2011). Nonetheless, Jayne et al (2016) estimate that 32% of all farmlands in Ghana are owned by urban elites, with farms comprising between 10-100 hectares. These middle-scale farms are the fastest growing enterprises in the Ghanaian countryside.

¹⁰ That with the size of Greater Paris and Jamaica

Impacts

Land acquisitions are frequently justified as bringing development and investment to the region, by having spill-over effects (Yassin Abdalla / Obeng-Odoom 2012, Cotula et al., 2004). As in the other cases, the same argument that these investments bring foreign capital to the national level, infrastructure development, create job opportunities and increase food security is used (Boamah 2011; Deininger 2011; Borrás Jr. et al 2011; Akram-Lodhi 2012. Instead the literature has reported that the loss of land by smallholders worsen rural poverty considering the fact that land is a major source of loss of livelihood particularly among farmers (Schoneveld 2011, Boamah 2011). The commodification of land does not see the importance smallholder farmers attach to their land and how they have built their way of life around communal land.

Just like most socio-economic problems, albeit land dispossession affects both men and women, in the case of Ghana as well, women are more disadvantaged (Yaro/Tsikata 2014). Remarkably, the Food and Agriculture Organization (2006) states that the majority of smallholder farmers are women. That is also to say that a greater proportion of smallholders whose land rights are often affected by land grabs tend to be women with effects ranging from being unfairly compensated to decreased food security and in some situations not even consulted in the process of their lands being taken (Yaro/Tsikata 2014). It is key to note that the ability to claim varies by sub-group and gender. The male heads in these communities are usually the beneficiaries of land transfer restitutions, with few women being considered (Darkwah et al., 2017). Within communities, traditional authorities have greater ability to stake claims on land than the typical community member or farmer. This has led to many cases in which women's vegetable plots are reclassified as male-controlled Household fields (Nyantakyi-Frimpong/Kerr 2017).

Additionally, land grabs over the years have led to the forced evictions and displacements of many farmers. Farmers who lose their land are often forced to migrate and to cultivate marginal lands (Acheampong/ Campion 2014; Yaro/Tsikata 2014). Men are often forced to move in search of work leaving their families behind, increasing women's workload (Nyantakyi-Frimpong/Kerr 2017). When no plot or work is found, families must find other forms of livelihood or to leave the countryside altogether. (Andrews 2018, Ayelazuno 2011).

More often than not, incoming corporations are focused on expanding profits through capital intensive ways rather than labor. This translates in few employment opportunities, with most of them being seasonal. As a result, lands are lost without corresponding compensatory opportunities (Yaro/Tsikata 2014). Moreover, there are many cases in which projects that have uprooted communities failed

to develop beyond planning or were later abandoned. Smallholders were then faced with losing their lands and later the promised employment opportunities (Acheampong/Campion 2014, Agbley 2019:169). Women are particularly affected because they earn their living by selling food crops and farm products. Since their source of livelihood is tied to their land, once they lose their land, they automatically become unemployed (Boamah 2011).

Despite these negatives, some positive effects of land grabbing were found in relation to education and employment of farming households. They were, however, not enough to outweigh the disadvantages already noted (Alhassan et al. 2018).

For this reason, attempts by governments or any other authority to seize portions of farmland is increasingly met with fierce opposition by communities (Suhiyini et al., 2018:1135). Some farming households in Northern Ghana, for example, refused to allow investors to take over their farm property for jatropha production without their agreement or any reparation (Acheampong/ Champion 2014). Even so, land grabbing continues because the government and traditional leaders are often the final arbiters in such cases and unfortunately make no effort to change these processes to the benefit of the victims (Tsikata/ Yaro 2014). Most of the smallholder farmers have lost their land simply because their interests are put against the interests of big agribusiness (Agbley 2019).

Furthermore, land grabbing has a substantial impact on food security in Ghana, which can be attributed to various factors. First, the practice places individuals, particularly farmers, in a financial bind, preventing them from acquiring agrochemicals like fertilizers and hybrid seeds that would boost agricultural production. As a result, they are left with only staple food to rely on, which are insufficient for all households (Suhiyini et al., 2018). Second, due to the fact that these land grabs tend to start off mostly on short term notices, farmers would not have gathered enough food by the time they need to leave (Agley 2019). Thirdly, farmers' decisions to invest in agriculture are frequently influenced by the tenancy insecurity (Aha/Ayitey 2017:49). The decentralization of land governance under the Land Commissions have not been able to provide the security poorer farmers need to invest in their lands (Biiter et al. 2017). Land loss and even the threat of it has resulted in lower yields (Schoneveld et al. 2011).

To conclude, the case of Ghana shows that despite land governance being in the hands of traditional authorities in most parts of the country, it does not provide more protection to peasants from land dispossession. Women seem to be particularly affected by large-scale land acquisitions in terms of loss of livelihoods.

Conclusion

This extensive literature review and case study comparison has sought to shed light into the issue of large-scale land acquisitions. We have found that there are many different types of investors of African lands, with many different interests. For instance, countries in the Arabian Peninsula invest in food production in the Horn of Africa, while the EU invests in biofuels in sub-Saharan Africa. The advent of financial capital in the form of sovereign wealth funds and speculative investments differentiates this new wave of land grabs initiated in 2007 from previous ones.

The literature has shown that despite the focus on large-scale land acquisitions, the fastest growing phenomenon in our case studies is the rise of the medium-scale land grabs by national urban dwellers (ranging between 5-100 h). This phenomenon is not yet fully grasped in its dimension and impact, so more investigation of these smaller processes is needed.

The parallel existence systems of traditional and statutory tenancy often create less tenant security and frequently leads to the poor farmers and pastoralists losing their lands. There is low accountability to peasants and often no compensation for the loss of lands or livelihood opportunities, despite the existence of mandatory legal processes of community consultations prior to land acquisitions. More often than not, peasants do not understand the laws and fail to grasp the magnitude of the projects proposed to them. In all our case studies we saw similar processes of forced dislocation to marginal lands and lack of delivery of jobs and compensations promised in the consultation processes. Dislocation also has an effect on food security, for it frequently happens under short notice, interrupting the growing season and affecting harvest and people's ability to take food with them.

Land dispossession and redistribution increases social differentiation within villages. Women, youths, the elderly and pastoralists are especially disadvantaged since they have limited abilities to make claims on land. Loss of land often affects other sources of compensatory incomes, especially those of women such as firewood and forest goods, especially those of women.

It is important to mark that all these processes of land acquisitions are resisted and contested to some extent¹¹, but the peasantry's ability to get an answer from the state or traditional authorities is in all cases extremely limited.

¹¹ Food sovereignty movements, like Via Campesina, have not been featured in the articles we reviewed, and their roles in relation to the affected peasantry is thus missing in this review.

Our initial interest that drove this literature review, that of the rural social question - or what happens to people's livelihoods when they are displaced, where do they go, how they compensate for the loss of land and what types of social policies there are in place for those displaced – has only been partly answered. People seem to be redirected to other areas in the countryside, which seems to generate more disputes over land. This finding generated more questions, such as how many of these people leave to the urban centers? If they are not going there, why?

The question of how people compensate for the loss of livelihoods is also only partly answered by the literature. People seem to engage again in agricultural endeavors in their new localities. But in the meantime, that time between displacement and the new fields being ready for harvest, how do they get along? Are there any formal or informal social policies they can rely on? Which? These questions are invitations to future research avenues.

Our brief overview of the struggle over land and the laws shaping land relations in each case study have allowed us to see that land grabs are a tool to exert authority in the national arena, who wield power and where. In other instances, it shows the limits of state authority, for instance, especially in the cases of Mozambique, where the state has to acquiesce to peasant rebellions in areas where the state is not as prominent and ignore in places where it is, and Ghana, where the state has no final say in the deals between traditional authorities and international investors. There may be other policies, such as financial and banking policies in which the state has control and may give some leverage to the state but this aspect has not yet been found in the literature of land grabs.

The brief historical overview of land governance has shown in the cases where colonialist presence was established, that colonialism had a role in shaping land governance to this day. The literature does not delve into the importance of cold war alignments, but our country case studies have shown it is plausible to assume that there is a difference that may matter. Ghana and Zambia, for instance, countries where privatization of ownership of land is more marked, were more aligned with the liberal side. Mozambique and Ethiopia, some countries aligned with the socialist block have maintained state ownership and control over land, though Zambia has not (Martín et al. 2016: 601). This could be an avenue for future investigation since the role of different historical and political trajectories of African countries is often dismissed in policy development and the ways in which large-scale land acquisitions occur today.

In a similar line, our literature review has noticed a lack of theoretical analysis of the process of turning collective property into individual property. There seems to be a general process of commodification at work. It implies changes not only on the

way of production (from subsistence to an intensive, market-oriented production), but also a way of life, because different way of producing means that many people will be left idle, without jobs or their traditional livelihoods. These are recurring features across cases in the literature.

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