



Environmental Crime and Corruption
Working Group

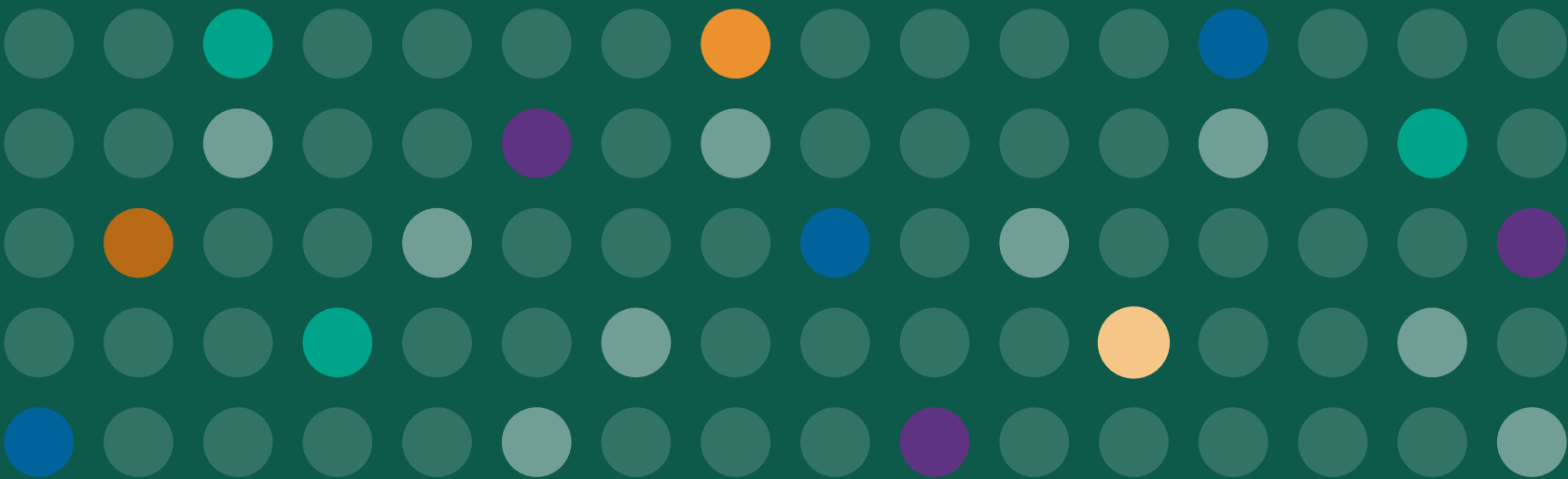
Global Civil Society
Coalition for the UNCAC



Wildlife Justice
Commission

A CIVIL SOCIETY GUIDE

Promoting Implementation of CoSP Resolution 11/9



Advancing action at the national level to combat
corruption linked to crimes that affect the environment



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Acronyms and glossary of terms

A reference list of the abbreviations used throughout this guide, followed by plain-language explanations of the key corruption-related terms it relies on.

ACRONYM	FULL NAME OR MEANING
AML/CFT	Anti-Money Laundering and Countering the Financing of Terrorism
CAE	Crimes that affect the environment
CARA	South Africa's Criminal Assets Recovery Account
CARIN	Camden Asset Recovery Inter-agency Network
CBD	Convention on Biological Diversity
CCPCJ	Commission on Crime Prevention and Criminal Justice
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
CoSP	Conference of the States Parties to the United Nations Convention against Corruption. "CoSP11" and "CoSP12" refer to its 11th and 12th sessions.
CSO	Civil society organization
DOF	Brazil's Forest Origin Document
ECC	Environmental crime and corruption
ECC WG	Environmental Crime and Corruption Working Group of the Global Civil Society Coalition for the UNCAC
ECOSOC	United Nations Economic and Social Council
EIA	Environmental Impact Assessment
EITI	Extractive Industries Transparency Initiative
EU	European Union
ESG	Environmental, social and governance
Eurojust	European Union Agency for Criminal Justice Cooperation
FATF	Financial Action Task Force
FINTRAC	Financial Transactions and Reports Analysis Centre of Canada

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FIU	Financial Intelligence Unit
GlobE	Global Operational Network of Anti-Corruption Law Enforcement Authorities
GRECO	Group of States Against Corruption (Council of Europe)
HRC	Human Rights Council
IBAMA	Brazilian Institute of Environment and Renewable Natural Resources
INTERPOL	International Criminal Police Organization
IRM	Implementation Review Mechanism of the UNCAC
IUCN	International Union for Conservation of Nature
KPK	Indonesia's Corruption Eradication Commission
KWS	Kenya Wildlife Service
MAAP	Monitoring of the Andes Amazon Program
MESICIC	Follow-Up Mechanism for the Implementation of the Inter-American Convention against Corruption
MLA	Mutual Legal Assistance
NGO	Non-governmental Organization
OGP	Open Government Partnership
OP	Operative paragraph of a resolution. Operative paragraphs set out the actions, mandates and commitments agreed in the resolution.
PP	Preambular paragraph of a resolution. Preambular paragraphs provide the background, context and justification for the resolution.
SACL	Self-Assessment Checklist
SIDS	Small Island Developing States
StAR	Stolen Asset Recovery Initiative
TNRC	WWF's Targeting Natural Resources Corruption initiative
UN	United Nations
UNCAC	United Nations Convention against Corruption
UNFCCC	United Nations Framework Convention on Climate Change
UNGASS	Special Session of the United Nations General Assembly
UNODC	United Nations Office on Drugs and Crime
UNTOC	United Nations Convention against Transnational Organized Crime

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Introduction to the guide

- **1.1 Aims of this guide**
- **1.2 The UNCAC and its CoSP Resolutions**
- **1.3 Why more action is needed to tackle environmental crime and corruption**

1.1 Aims of this Guide

At the 11th session of the Conference of the States Parties (CoSP11) to the United Nations Convention against Corruption (UNCAC), held in Doha, Qatar in December 2025, States Parties adopted [Resolution 11/9, “Preventing and combating corruption as it relates to crimes that affect the environment”](#) (CAE) - a landmark consensus commitment to use the world’s most widely ratified anti-corruption treaty against the corruption that drives environmental crime. The resolution builds on the groundwork laid by UNCAC CoSP8 Resolution 8/12, “Preventing and combating corruption as it relates to crimes that have an impact on the environment”, adopted in 2019, which first formally recognized the relationship between corruption and CAE and called on States Parties to take measures to prevent, investigate, and prosecute corruption offences linked to these crimes. Civil society organizations (CSOs) played a key role in advocating for a strong resolution with meaningful commitments to tackle environmental crime and corruption, many of which are reflected in the adopted resolution.

This guide is an advocacy tool for CSOs and other non-state actors to use at the national and global levels to help move the commitments made in Resolution 11/9 from policy commitments to implementation and tangible action.



At the national level

This guide is intended to help CSOs understand what each commitment in Resolution 11/9 requires, why it matters, what meaningful implementation could look like in practice, and the role that civil society can play in these efforts. It can be used by civil society to:

- advocate with governments for concrete national action to prevent and address corruption related to CAE and for regular reporting on progress made with implementation;
- contribute to implementation, including by identifying gaps, sharing evidence and expertise, and engaging in technical assistance and capacity-building efforts.



At the global level

This guide is intended to help civil society contribute to and document implementation progress, gaps, and emerging good practice across countries and to use this evidence in engagement with governments, UNCAC subsidiary bodies, and the United Nations Office on Drugs and Crime (UNODC), including the implementation reports of UNODC, technical assistance discussions, and other relevant international processes.

The guide includes good-practice examples from governments, international organizations, the UNODC, civil society, and the private sector; and provides direct links to relevant resources.

By building a stronger evidence base on implementation, the guide can support accountability for the commitments in Resolution 11/9 and strengthen the case for stronger commitments at CoSP12 and beyond, as well as in other relevant international and regional forums.

1

Who is this guide for?

This guide is written for civil society: CSOs and coalitions, community-based organizations, Indigenous Peoples, journalists, researchers, practitioners, environmental human rights defenders and other non-state actors working on preventing and combating corruption linked to CAE.

It outlines how organizations can use Resolution 11/9 within their own mandates to advance work on this issue, and how to tailor it to their country contexts.

Government officials, parliamentarians, the private sector and technical assistance providers will also find it useful as a starting point for translating the resolution into national action.





A checklist to get started

The following are some realistic and practical ways to begin promoting implementation of Resolution 11/9 in your country:



Read [Chapter 2](#) and identify the operative paragraphs (OPs) most relevant to your national context, your interests and advocacy objectives.



Map those responsible in your government for each area of focus—such as the anti-corruption commission, an environmental or natural-resource agency, a financial intelligence unit (FIU), or licensing authority.



Build a baseline of the current situation in your country: for each priority OP, note whether a law/policy exists, how it is implemented in practice (or not), and where the main gaps and corruption risks lie.



Contact your country's UNCAC national focal point to start engaging about registering your interest in IRM country reviews. Try to find out who your country's UNCAC focal point is from the governmental expert list on your country's [UNODC's country profile](#) or on the Coalition's [UNCAC Review Status Tracker](#).



Choose one national entry point from [Chapter 3](#): a single meeting, submission, or awareness-raising activity to launch your efforts, or more, depending on your interests, resources, and the scale and nature of the problem.



1.2 The UNCAC and its CoSP resolutions

The UNCAC, adopted in 2003 and in force since 2005, is the only legally binding universal anti-corruption instrument, with 192 Parties, including the European Union (EU). Its chapters cover preventive measures (Chapter II), criminalization and law enforcement (Chapter III), international cooperation (Chapter IV), asset recovery (Chapter V), and technical assistance and information exchange (Chapter VI). While the UNCAC is not an environmental treaty, its tools apply directly to the corruption that enables crimes such as illegal logging; illegal mining; illegal fishing; wildlife, minerals, and waste trafficking; and the laundering of their proceeds.

Every country that has joined the Convention gets a say in how it is put into practice. They do this through the [Conference of the States Parties \(CoSP\)](#), a large meeting of all member countries held every two years, and the Convention's main decision-making body.

At each meeting, the CoSP adopts resolutions and decisions. These are agreed commitments that help countries build their capacity to fight corruption, cooperate with one another, and put the Convention into practice.

To ensure these commitments are carried through during the time between CoSP meetings, the CoSP has set up [Working Groups](#) (formally called "subsidiary bodies"). These groups look at specific topics in depth and report back to the CoSP with advice and recommendations.

Finally, countries check on each other's progress through the Implementation Review Mechanism (IRM). This is a peer-review process: each country's implementation of the Convention is examined by other member countries. At its eleventh session (CoSP11), the Conference agreed to launch a [second phase of reviews](#), with new country reviews starting in 2027 (Resolution 11/2).

What CoSP resolutions are and why they matter

CoSP resolutions are not legally binding, but they represent the latest global consensus on anti-corruption: every resolution so far has been adopted by consensus*, meaning that all States parties could take ownership and implement adopted resolutions. Because every word of a resolution is negotiated, the precise language matters. Countries are expected to follow through on what they have agreed to and often the resolutions include calls to action requesting the UNODC to help States implement resolution commitments through capacity building and technical assistance and by documenting challenges and good practices. Resolutions can have an impact on strengthening capacity, filling legislative gaps, improving implementation, raising awareness about pressing topics, fostering action from different stakeholders, and in other ways (see the Kenya example below).

* States may disassociate themselves from a resolution as a whole, or from specific paragraphs within it, through an explanation of position, without breaking the consensus under which the resolution is adopted.



How a CoSP resolution can help advance country-level reform to tackle environmental crime and corruption

[Resolution 8/12 \(2019\)](#) on “Preventing and combating corruption as it relates to crimes that have an impact on the environment” was the first resolution addressing the intersection of corruption and environmental crime. It included commitments on prevention, criminalization and law enforcement, asset recovery, international cooperation, civil society participation, and whistleblower reporting and protection.

It called for countries to take measures to assess and mitigate corruption risks along value chains. It also included follow-up measures to be implemented by the UNODC to support countries' implementation of the resolution, including the provision of technical assistance. In one example, [UNODC strengthened its support to the Kenya Wildlife Service \(KWS\)](#). As a result, KWS established corruption-prevention committees across Kenya's parks and conservation areas, strengthened reporting mechanisms and created an Integrity Office. UNODC also extended support to the Kenya Fisheries Service to address identified corruption risks and strengthen whistleblower protection mechanisms.

Beyond UNODC-supported initiatives, a number of CSOs and academics have documented reforms and continuing challenges consistent with the objectives of Resolution 8/12. [WWF's Targeting Natural Resource Corruption \(TNRC\)](#) initiative, implemented in a consortium with George Mason University's Terrorism, Transnational Crime and Corruption Center (TraCCC), TRAFFIC, and U4 Anti-Corruption Resource Centre at the Chr. Michelsen Institute, has generated a substantial body of [research, guidance, and learning tools](#), aimed at strengthening anti-corruption approaches in the management of wildlife, forests, and fisheries. It co-founded the Countering Environmental Corruption Practitioners Forum that brings together [a community of over 600 conservation and anti-corruption experts](#) to find and implement solutions. The Basel Institute's [Seedlings of Hope](#) and [Saplings of Hope](#) reports tracked emerging integrity measures and institutional developments. Together, these resources demonstrate how Resolution 8/12 has informed broader policy discussions, supported accountability efforts, and provided a framework for civil society to assess progress and remaining gaps.

Resolution 8/12 also served as an important basis for Resolution 11/9, which builds on its recognition that corruption can facilitate environmental crime and highlights the importance of strengthening efforts to address these connections.

Each resolution consists of two kinds of paragraphs:

1 Preambular Paragraphs (PPs)

These set the context: they provide background and justification, recall earlier resolutions and instruments, and record what States collectively recognize about the problem. PPs are not commitments, but they are agreed language. Civil society can cite them as the position all governments have accepted.

2 Operative Paragraphs (OPs)

These set out the actions: concrete mandates and commitments addressed to States Parties, UNCAC bodies, UNODC, or donors.

Each OP begins with an action verb to indicate the nature and strength of the commitment, such as “urges”, “calls upon”, and “strongly encourages”. The action verbs “directs” and “requests” apply to UNCAC subsidiary bodies and to the UNODC as the Secretariat; OPs also typically carry negotiated caveats (“in accordance with domestic law”, “where appropriate”, “on a voluntary basis”) to reflect the differences in national legal systems, institutional arrangements, and implementation contexts, particularly regarding how a commitment is put into practice, while preserving the paragraph’s underlying objective.

From a civil society perspective, a meaningful CoSP resolution is one that:



Adopts new commitments that reflect higher standards for UNCAC implementation in a thematic area, through:

- Raising the bar on commitments, so they meaningfully address the real gaps and challenges on the ground to bring about change.
- Clarifying necessary actions.



Sets the agenda for CoSP subsidiary bodies’ discussions, including through:

- Inviting States Parties to share detailed written information on their implementation efforts, including on gaps and challenges.
- Directing the UNODC to compile information, do research, and provide a written report to the CoSP and its subsidiary bodies summarizing the information and providing recommendations.

- Directs the UNODC to deliver specific technical assistance programs to requesting countries.
- Includes and recognizes the role of civil society, ideally naming specific groups of stakeholders.

This guide comprehensively reproduces and analyzes the adopted language of each OP in Resolution 11/9, in Chapter 2.

1.3 Why more action is needed to tackle environmental crime and corruption

The problem: corruption drives crimes that affect the environment

CAE, including illicit trafficking in wildlife, timber, in hazardous wastes and other wastes, and in precious metals, stones and other minerals; illegal logging, mining, fishing, and waste dumping; and pollution and degradation of air, water, and soil, are widely recognized as the third largest criminal sector in the world. These crimes generate an estimated **USD 110–281 billion in criminal proceeds annually** and impose substantial economic, fiscal and development costs:



Wildlife, timber & marine trafficking

[Learn more](#)

USD 1–2 trillion

estimated global economic impact per year

Lost government revenues, damaged ecosystem services and forgone development opportunities.

USD 7–12 bn in annual fiscal revenue is stripped from source-country governments by illegal logging, fishing and wildlife trade combined.



Illegal & unreported fishing

[Learn more](#)

USD 15.5–36.4 bn

in illicit profits generated annually

USD 8.9–17.2 bn a year is redirected away from legitimate markets by illicit seafood trade.

USD 1.6–3.1 bn in tax revenue is lost each year — around three quarters of it tied to African and Asian marine resources.



Illegal mining

[Learn more](#)

USD 12–48 bn

in revenue host countries forgo every year

Money that would otherwise have been collected had the same minerals been extracted and traded legally.



Waste trafficking

[Learn more](#)

USD 10–12 bn

in profits generated annually

Governments are left with billions of dollars in clean-up costs long after the profits have moved on.

The cost is not only fiscal: dumped and mismanaged waste carries serious impacts for public health and safety.

These figures are only estimates of the impact of CAE but they show their significance. Such crimes undermine legitimate businesses, distort markets, weaken food security, deter legitimate investment and deprive governments of resources urgently needed for public services, environmental and climate protection, and development. According to [Interpol](#), environmental crimes "are frequently linked to corruption, fraud, money laundering and other serious offences, enabling criminal networks to expand their reach and strengthen their operations. Tackling environmental crime is therefore not only about protecting natural resources, but also about disrupting the criminal networks that threaten security, governance and the rule of law worldwide."

Corruption is the enabler at every link in global supply chains: bribery in the award of concessions, permits, and licences; corrupt customs and border clearance; embezzlement and state capture in resource-rich sectors; and the laundering of proceeds through opaque corporate structures and professional intermediaries. The same governance failures undermine climate action, destroying carbon sinks, distorting environmental policy and diverting funds meant for environmental protection.

They also put environmental defenders, Indigenous Peoples, and local communities at risk:

- Oil and other extractive projects can carry serious health consequences for nearby communities, adversely affecting their drinking water, farmland, fisheries and air quality.

A recent report by [Amnesty International and 8 civil society organizations](#), on oil operations in the Niger Delta, documents these impacts and the chronic lack of transparency surrounding them. [Global Witness' report](#) on the serious risks facing land and environmental defenders working to protect their land, include threats, violence and killings. It cites the example of an environmental activist in Southeast Asia who, according to the report, received a 14-month prison sentence "after campaigning against destructive infrastructure projects and alleged corruption".

- According to the Institute for Public Policy Research, [the Fishrot case](#) has been associated with significant impacts on fishing communities, including job losses, increased economic hardship, food insecurity, and broader social challenges.
- Kakataibo Indigenous communities in the Peruvian Amazon region are reported to face [a range of threats](#), including drug trafficking, mining, logging, land occupation and deforestation associated with cattle ranching. According to community organizations and advocacy groups, these pressures threaten community safety and access to ancestral lands.

What the CoSP had done before Resolution 11/9 and why more action was needed

CoSP Resolution 8/12, adopted in 2019, was an important milestone as the first UNCAC resolution dedicated specifically to the links between corruption and CAE. However, it does not fully address a number of major corruption risks, including ones that have emerged since its adoption.

These include:

- risks relating to public procurement and the awarding of concessions, licences, and permits;
- hidden company ownership;
- and the role of banks and professional service providers in moving or concealing illegal profits linked to environmental crime and corruption.

Resolution 8/12 also left scope for promoting stronger enforcement, including the use of special investigative techniques and joint investigations; the use of technology to combat corruption linked to

CAE; access to public information to strengthen public oversight; the vital role played by local communities and Indigenous Peoples; and integrity and transparency in public-private relations.

These risks and gaps have become increasingly [urgent](#) as organized criminal networks have expanded and diversified their involvement in illegal mining, logging, fishing, wildlife trafficking, waste crime, and other environmental offenses, often relying on corruption, money-laundering, fraud, and other crimes to enable their activities.

According to the [United Nations Environment Programme](#), global resource extraction has tripled over the past five decades and could increase by another 60 per cent (from 2020 levels) by 2060.

There are growing concerns that [rapid expansion of transition mineral mining](#) could outpace oversight and increase corruption risks in decisions governing access to and use of mineral resources, reinforcing the relevance of Resolution 11/9.

Importantly, other adopted CoSP resolutions related indirectly to preventing and combating corruption that enables CAE and could be leveraged by CSOs for their national advocacy. Some of these resolutions include ambitious calls to action and provide specific guidance on crucial issues, such as:

Resolution 10/5



corruption and
organized crime

Resolution 10/8



protection of
reporting persons

Resolution 9/7 and 10/6



beneficial ownership
transparency

Resolution 10/9



public procurement
transparency and integrity

CSOs advocated for a dedicated resolution that would commit States Parties to apply these commitments specifically to corruption linked to CAE.

Momentum to prioritize tackling CAE and related corruption was also built across other forums, for example:

- [Resolutions 10/6](#) and [12/4](#) of the Conference of the Parties to the *United Nations Convention against Transnational Organized Crime (UNTOC),
- [Resolution Conf. 17.6](#) of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES),

- [General Assembly Resolution 76/185](#)
- United Nations Economic and Social Council (ECOSOC) [Resolution 2025/17](#)

These all called for stronger action to address these issues.

(see the Glossary of Terms in Annex I for more information on these forums).

CIVIL SOCIETY ADVOCACY

The Global Civil Society Coalition for the UNCAC's (the Coalition) Environmental Crime and Corruption Working Group (ECC WG), with nearly 280 representatives of CSOs worldwide, chaired by the Wildlife Justice Commission (WJC), coordinated sustained civil society advocacy for a resolution focused on corruption linked to CAE.

~280

CSO representatives in the working group

300+

organizations and experts signed the open letter

99

countries represented among signatories

This included an open letter signed by over 300 organizations and experts from 99 countries, a compendium of gaps and good practices, and a written submission to CoSP11 calling for a strong, dedicated resolution to address gaps and challenges in tackling corruption linked to CAE globally.

[Open letter](#)

[Compendium](#)

[Written submission](#)

** The effectiveness of the UNTOC review mechanism has been undermined by persistent delays in implementation, raising concerns about its ability to fulfil its intended objectives. Civil society should advocate for strengthening the review mechanism, and also produce civil society assessments of countries' implementation of UNTOC, including examining application of the UNTOC to combat organized crime linked to environmental crime and corruption.*



2



Understanding Resolution 11/9

An overview

- **2.1 An overview of Resolution 11/9**
- **2.2 A paragraph-by-paragraph analysis**

2.1 An overview of Resolution 11/9

At CoSP11, Resolution 11/9 was tabled jointly by Brazil and Namibia and co-sponsored by Burkina Faso, Chile, Colombia, Costa Rica, Côte d'Ivoire, the Dominican Republic, Ethiopia, Ghana, Honduras, Iraq, Japan, Kenya, Lesotho, Nigeria, Norway and Peru.

Despite an extremely challenging geopolitical context and difficult negotiations, particularly on environment and climate-related language, civil society participation and protection, and linkages to the sustainable development agenda, Resolution 11/9 was adopted by consensus on 19 December 2025 at the 11th Conference of States Parties of the UNCAC.

All 192 UNCAC States parties who joined the consensus **are expected to promote the implementation of the resolution in their domestic efforts**, and resolution sponsors may signal an even stronger commitment. For example, resolution sponsors often actively engage in follow-up discussions in UNCAC forums, report in a more transparent and comprehensive manner on their national implementation efforts, and provide funding to UNODC and other relevant stakeholders to convene expert meetings, conduct research, and deliver technical assistance, when mandated in the resolution.

Sponsoring States may also consider tabling a follow-up resolution in a future CoSP session.

The resolution builds upon the framework set by Resolution 8/12, with new commitments on:

-  preventive integrity tools in licensing
-  open government and access to information
-  technology
-  cross-border cooperation
-  reporting persons



-  public-private integrity and transparency
-  liability of legal and natural persons (strengthening language from 8/12)
-  joint investigations and special investigation techniques (UNCAC Articles 49 and 50)
-  asset recovery (including the International Criminal Police Organization - INTERPOL Silver Notice system)
-  beneficial ownership
-  financial supervision
-  the role of enablers

Its preamble also contains the first explicit CoSP recognition of Indigenous Peoples and local communities (alongside [Resolution 11/3: Strengthening the implementation of the United Nations Convention against Corruption in small island developing States](#), also adopted at CoSP11).



WHAT IS MISSING

Important elements in the draft resolution were weakened or dropped during negotiations. Most notably, references to climate change, the 2030 Sustainable Development Agenda, environmental defenders, stronger language on a safe and enabling environment for civil society, and designation of CAE as a predicate offense were left out.

However, civil society can still advocate for these elements to be addressed in the coming years, in particular ahead of CoSP12. Advocacy efforts should focus on the implementation of 11/9's commitments, alongside the need to address these important gaps.

What is in Resolution 11/9?

The table below summarizes the main contents of the full resolution (please see the full text of the resolution in [Annex II](#)). Preambular paragraphs set the context, operative paragraphs 1–15 contain the substantive commitments addressed to States Parties, and operative paragraphs 16–19 set out follow-up measures to be taken by UNODC. [Chapter 2.2](#) of this guide analyses each operative paragraph in detail and quotes the adopted text in full.

Preambular Paragraphs

Context, recognition of past commitments and linkages, citable as globally agreed language.

Operative Paragraphs 1-15

Substantive calls to action addressed to States Parties.

Operative Paragraphs 16-19

Follow-up and implementation—mandates to the Working Group on Prevention, UNODC, and donors; key civil society advocacy entry points to CoSP12.

Preambular Paragraphs

Summary of what States recognize (done thematically)

	Preventing and combating corruption is a priority and the CoSP reiterates its concerns regarding the seriousness of the problems and threats posed by corruption, while recognizing that anti-corruption and integrity measures help prevent and combat CAE, and so help conserve and protect the environment.
	Corruption linked to CAE weakens public policies and public procurement, including in the fight against organized crime.
	The UNCAC is an effective tool and a central part of the legal framework for tackling corruption linked to CAE and strengthening international cooperation. A growing number of international, regional, and national instruments now address the challenge (recalling Resolution 8/12, Resolution 10/5, the Special Session of the United Nations General Assembly (UNGASS) political declaration, GA Resolution 76/185, ECOSOC Resolution 2025/17, UNTOC COP Resolutions 10/6 and 12/4, CITES Resolution 17.6, and the Kyoto Declaration).
	Research on the challenge is progressing, including UNODC's overview report on corruption and crimes that have an impact on the environment and the Secretariat's report on corruption involving organized criminal groups .
	Intergovernmental organizations, the media, civil society, and reporting persons contribute to prevent and fight against corruption as it relates to CAE.
	Indigenous Peoples and local communities play a vital role in conserving and sustainably using the environment, and corruption linked to CAE can undermine their livelihoods. This is the first explicit reference to Indigenous Peoples and local communities in a CoSP resolution (alongside Resolution 11/3).
	The private sector is making increasing efforts to promote integrity, transparency, and accountability, including through anti-corruption measures relevant to CAE.
	The CoSP reaffirms its mandate to cooperate with international and regional organizations, mechanisms, and non-governmental organizations (Article 63)—which is useful agreed language for civil society engagement—and reaffirms every State's full and permanent sovereignty over its natural resources.

Operative Paragraphs 1-15

Prevention and transparency (OPs 1-8)

OP 1	Develop, strengthen, and implement anti-corruption frameworks and policies that address corruption linked to CAE, and that promote the rule of law, proper management of public affairs and property, integrity, transparency, and accountability.
OP 2	Strengthen integrity frameworks and use of preventive integrity tools in the public sector, including within environmental bodies and in the awarding of concessions, licences, and permits. Tools could include: codes of conduct, conflict-of-interest standards, corruption risk management processes, and integrity, transparency, and accountability mechanisms in public procurement and human resources management.
OP 3	Develop or strengthen robust frameworks to address corruption linked to CAE, particularly open government, transparency, and giving the public effective access to relevant information, so the public can exercise oversight.
OP 4	Use technologies—identification, traceability, due diligence, and authentication—to prevent, investigate, and combat corruption linked to CAE, working in cooperation with other State Parties, UNODC, INTERPOL, and other relevant organizations and stakeholders.
OP 5	Strengthen cross-border cooperation and enforcement controls, including timely information sharing among law enforcement agencies, including through regional organizations and with INTERPOL.
OP 6	Establish and strengthen confidential, accessible, diversified, reliable, and inclusive internal and external reporting systems, including anonymous reporting, to facilitate reporting of corruption linked to CAE and protect reporting persons' identities and personal information.
OP 7	Enable civil society, non-governmental organisations (NGOs), and community-based organizations to participate actively in the prevention of and fight against corruption, and raise public awareness of the existence, causes, gravity, and threat of corruption as it relates to CAE.
OP 8	Promote integrity and transparency in private-public sectors' relations: prevent and manage conflicts of interest, prevent undue advantage, and support comprehensive corporate integrity and compliance programmes to prevent corruption as it relates to CAE.

Operative Paragraphs 1-15

Enforcement and accountability (OPs 9–10)

OP 9	Hold both companies and individuals liable when they commit acts of corruption linked to CAE.
OP 10	Build capacity to detect, investigate, prosecute, and adjudicate corruption linked to CAE, especially its links to organized crime, money-laundering, and illicit financial flows, including through joint investigations and special investigation techniques (Articles 49 and 50), with authorities that are properly resourced and free from undue influence.

Operative Paragraphs 1-15

International cooperation, asset recovery, and following the money (OPs 11–15)

OP 11	Prevent the transfer abroad of the proceeds of corruption linked to CAE by denying safe haven, and strengthening mutual cooperation to identify, trace, freeze, seize, confiscate, recover, and return them—using tools such as the INTERPOL silver notice system.
OP 12	Cooperate internationally in criminal matters, and consider assisting each other in civil and administrative investigations and proceedings.
OP 13	Use and share beneficial ownership information, and make sure competent authorities can access it.
OP 14	Strengthen frameworks to regulate and supervise banks, non-bank financial institutions, money or value transfer services, and other money-laundering-prone bodies, to assess and address their role in facilitating or enabling corruption linked to CAE.
OP 15	Engage service providers (enablers) to put in place effective internal controls that detect and deter suspicious activity and prevent misuse of their services to facilitate corruption and illicit financial flows derived from CAE.



● Operative Paragraphs 16-19

Follow-up and implementation (OPs 16–19)

OP 16	The Working Group on Prevention will discuss good practices, lessons learned, and challenges in using anti-corruption tools against corruption linked to CAE, at its 17th or 18th session—to identify needs and inform technical assistance, capacity building, and national policy development.
OP 17	Acknowledges UNODC’s work developing technical assistance programmes on this issue.
OP 18	UNODC will report on implementation of the resolution to CoSP12 (Uzbekistan, 2027) and to relevant subsidiary bodies.
OP 19	Donors are invited to fund implementation through extrabudgetary resources, which UNODC is to use efficiently and effectively.

2.2 A paragraph-by-paragraph analysis

This section analyses each of the 19 OPs of Resolution 11/9. **OPs 14 and 15 are presented together** because both address institutions and service providers whose services may facilitate corruption and related illicit financial flows.

For each OP, the guide sets out:

The full adopted text

The language of CoSP resolutions is highly negotiated, and quoting the agreed text precisely is important for advocacy on implementation.

Why the commitment matters

Including what it adds to, or builds upon, relative to Resolution 8/12 (2019).

Key policies and measures

What States should do to meaningfully implement the call to action. These are not intended to be comprehensive, and should be adapted to national risks and circumstances.

Examples of good practice

Drawn from a range of actors, with direct links to sources: governments, international organizations, UNODC, civil society, and the private sector.



Prevention and transparency

OP 1 - Develop and effectively implement anti-corruption frameworks and policies

Resolution language

"Urges States Parties, in accordance with the United Nations Convention against Corruption and the fundamental principles of their domestic law, to address corruption as it relates to crimes that affect the environment by developing, strengthening and effectively implementing anti-corruption frameworks and policies that reflect the principles of the rule of law, proper management of public affairs and public property, integrity, transparency, and accountability;"

Why it matters

Existing anti-corruption laws and tools, including those that promote integrity, transparency, and accountability, should be applied to counter corruption linked to CAE, but they are often not used systematically to address this challenge.

This issue may also be missing from national strategies, institutional mandates, and enforcement priorities.

OP 1 calls on governments to close this implementation gap through strengthening and effectively implementing anti-corruption frameworks and policies through the UNCAC framework, to address corruption linked to CAE.

Key policy and implementation

measures

- Review relevant anti-corruption laws, policies, and strategies, and close gaps that hinder their application to protect the environment.
- Review relevant environmental and natural-resource laws, policies, strategies and close gaps that hinder the adoption of measures to prevent and counter corruption.
- Strengthen inter-agency coordination, institutional independence, and capacity, and promote meaningful civil society participation in implementation and monitoring.





Examples of good practice

Latin America and the Caribbean

Framework for Action to address corruption in the mining sector

In September 2025, UNODC and Brazil's Comptroller General's Office (CGU) convened law enforcement and mining authorities from 18 Latin American and Caribbean countries in Rio de Janeiro to develop a Framework for Action countering corruption, organized crime, and money laundering in the mining sector. Its measures include interoperable traceability platforms, inter-institutional coordination mechanisms, strengthened anti-money laundering measures, integrity requirements for industry, technical and judicial capacity-building, data and technology tools, regulatory reform, and citizen participation. This Framework operationalizes the Convention's call for transparency, accountability, and integrity in public administration, applied to a sector where CAE and corruption are closely intertwined. It is offered as an adaptable model, to be tailored to each country's context.





OP 2 - Strengthen integrity in public institutions through codes of conduct, conflict of interest standards and integrity, transparency, and accountability in public procurement

Resolution language

"Calls upon States Parties, in accordance with their domestic law, to strengthen integrity frameworks and the use of preventive anti-corruption tools in the public sector, particularly in institutions involved in environmental conservation and protection, including, where appropriate, by developing codes of conduct, implementing conflict-of-interest standards, undertaking corruption risk management processes and promoting integrity, transparency and accountability in public procurement, human resources management and the awarding of concessions, permits and licences;"

Why it matters

Public authorities decide how natural resources are managed and make decisions on who can access them.

For example, public officials issue mining licences, logging concessions, fishing quotas, environmental permits, and waste management contracts, among others. Bribery, conflicts of interest, favouritism, and political interference can distort these decisions and weaken safeguards.

OP 2 sets out practical corruption prevention measures for public institutions.

Key policy and implementation measures

- Conduct, and act on, regular corruption-risk assessments in public sector authorities and processes involved in the conservation and protection of natural resources, including procurement, licensing, concessions, inspections, enforcement, customs, and the criminal justice chain (law enforcement, prosecution, judiciary, border management), and for environmental impact assessments.
- Require comprehensive [asset and interest declarations](#) for public officials in decision-making roles, particularly those in positions exposed to a high risk of corruption (such as functions relating to licensing, permitting, concessions, procurement and enforcement), with verification, conflict-of-interest controls, sanctions, and public access.



Key policy and implementation measures - continued

- Use open, competitive, and documented procurement and licensing processes, publishing criteria, applicants, beneficial ownership information, awards, contracts, changes, and implementation data in line with Extractive Industries Transparency Initiative (EITI) and open-contracting good practices and open data standards as covered in CoSP [Resolution 10/9](#) on procurement integrity and transparency. Use electronic permits and data-driven processes where possible to improve transparency, record keeping and audit, and reduce opportunities for falsifying and manipulating paper documents.
- Strengthen vetting, protected reporting and independent complaint, audit and review mechanisms, and publish follow-up actions.
- Introduce the proactive use of beneficial ownership information to screen for conflicts of interest between suppliers and public officials into existing due diligence procedures.
- Implement codes of conduct tailored for the specific challenges faced by public officials involved in the management of natural resources.
- Ensure meaningful public participation and transparency throughout licensing, permitting and concession allocation processes, including opportunities to challenge decisions where appropriate.



Examples of good practice

Indonesia

[Turning corruption-risk findings into mining-sector reform](#)

Indonesia's Corruption Eradication Commission (KPK) addressed corruption risks in mining through the [National Movement](#) to Save Natural Resources and the Korsup Minerba coordination-and-supervision programme. Working with national and provincial authorities, KPK reviewed mining licences, company obligations, state revenue, and weaknesses in information and oversight systems. By 2025, KPK reported that the number of Mining Business Licences had fallen from 4,877 to 2,631, while outstanding non-tax revenue liabilities declined from IDR 25.5 trillion to IDR 3.7 trillion. An additional IDR 21.8 trillion in state revenue was received in 2024. [CSOs independently monitored and ranked provincial implementation](#), while [Publish What You Pay Indonesia documented the permit-reform process](#). The initiative shows how anti-corruption risk assessment, inter-agency coordination, data integration, and civil-society oversight can produce measurable improvements in natural-resource governance. Independent civil society monitoring helped ensure that permit reforms translated into improved accountability rather than becoming a one-off administrative exercise.



OP 3 - Robust frameworks for open government, transparency, and effective public access to information to enhance public oversight and public awareness

Resolution language

"Encourages States Parties, where appropriate and in accordance with their domestic law, to develop or strengthen robust frameworks to address corruption as it relates to crimes that affect the environment, in particular, frameworks for open government, transparency and effective public access to relevant information with a view to enhancing public oversight and public awareness;"

Why it matters

Corruption is difficult to expose when decisions over land, natural resources, and environmental protection are hidden. Timely, usable information on permits, contracts, assessments, inspections, and enforcement enables civil society, journalists, Indigenous Peoples, and affected communities to identify irregularities and hold decision-makers to account.

OP 3 links access to information directly to increasing public oversight and public awareness.

Key policy and implementation measures

- Adopt and effectively implement [comprehensive access to information laws](#) that cover environmental and natural-resource information held by public bodies and by entities performing public functions or managing public resources. Access to information tools should be matched to context and capacity.
- Proactively disclose permits, licences, concessions, contracts, environmental and social impact assessments, beneficial ownership information, payments and revenues, inspections, compliance findings, enforcement decisions and actions, sanctions (prosecutions and judgements), rehabilitation obligations, and compliance monitoring reports in current, searchable, and machine-readable formats.



Key policy and implementation measures - *continued*

- Ensure that proactively disclosed information is accessible to affected communities, including through translations into indigenous and local languages, plain language summaries of technical Environmental Impact Assessments (EIA) and other assessments, and offline or community-level dissemination mechanisms.
- Apply narrow and clearly-defined exceptions, subject to harm and public-interest tests, with enforceable deadlines, independent oversight and appeals, and sanctions for deliberate obstruction or unjustified non-disclosure.
- Maintain open and interoperable environmental and geospatial databases and public or widely accessible beneficial ownership registers that enable interoperability; for example, by including unique identifiers for individuals and companies.
- Ensure that disclosed information is published in open, machine-readable formats and remains accessible over time to enable public monitoring and independent analysis.
- Protect civil society, journalists, environmental defenders, Indigenous Peoples, and community monitors who seek, use, or publish information.
- Foster the participation of all key stakeholders in key resources management decision-making processes.



Examples of good practice

Global example

[The Aarhus Convention – using access to environmental information to strengthen transparency and accountability](#)

The Aarhus Convention, which currently has 48 Parties, including the EU, States across Europe and Central Asia, and Guinea-Bissau, is a legally binding framework guaranteeing rights of access to environmental information, participation in environmental decision-making and access to justice. These rights enable civil society and communities to access and use information on environmental decisions and activities, including permits, authorisations, forest management, pollution and enforcement. One example shows how public information can help civil society detect illegal logging: In Romania, [WWF Romania](#) analyzed data made available through the government's Forest Inspector platform and identified potential irregularities in timber transports, using the findings to engage enforcement authorities and advocate for stronger monitoring and controls.



Examples of good practice - *continued*

Norway

[Using open satellite data to strengthen forest monitoring and accountability](#)

Through Norway's International Climate and Forest Initiative, free access was provided to high-resolution satellite imagery covering tropical forests. By January 2025, the program had more than 37,000 registered users in 158 countries, with the data used by governments, researchers, Indigenous Peoples, media and the private sector to monitor deforestation, support law-enforcement efforts, protect Indigenous territories, inform research and investigative journalism and strengthen transparency and accountability. Following conclusion of the program's initial satellite data program in 2025, Norway continues to support open satellite-based forest monitoring, including through Phase 3 of FAO's SEPAL platform, which provides access to the NICFI satellite-data archive alongside other forest-monitoring tools.

OP 4 - Use technology for identification, traceability, due diligence, and authentication

Resolution language

"Also encourages States Parties, in accordance with their domestic law and within their means, to work in cooperation with each other, as well as with relevant organizations and stakeholders, such as the United Nations Office on Drugs and Crime and the International Criminal Police Organization (INTERPOL), to identify and promote, on a voluntary basis, the use of technologies to prevent, investigate and combat corruption as it relates to crimes that affect the environment, in particular, technologies for identification, traceability, due diligence and authentication, in order to support criminal investigation and prosecutions;"

Why it matters

Paper-based, fragmented, or poorly controlled permits and records can be altered, duplicated, or checked inconsistently, helping illegal commodities enter legal supply chains. Identification, traceability, due-diligence, and authentication technologies can improve verification and create evidence for investigations and prosecutions. These systems must be secure, interoperable, and subject to independent oversight because digitization alone does not prevent corruption.

Key policy and implementation

measures

- Digitize and connect permit, licence, concession, inspection, and customs systems where appropriate, with secure audit trails and independent verification.
- Require traceability and authentication for high-risk commodities and integrate ownership, licence, shipment, and enforcement data.
- Develop a clear data approach to collect, manage and maintain quality data sets and proactively publish key data as open data. *High quality, structured data is crucial to ensure that AI and other technologies have underlying datasets to be effective, for example in identifying red flags, spotting patterns as part of investigations etc. (this principle applies not just to this OP but more broadly).*



Key policy and implementation measures - *continued*

- Use data analytics, including machine-learning-enabled processes and artificial intelligence tools, with [robust human oversight](#), to identify suspicious documents, financial patterns, transactions, and anomalies in official decision-making (e.g. licensing, permitting, or procurement awards); and use satellite and drone imagery to detect suspicious shipments and on-the-ground activity. All digital evidence should be preserved for use in criminal proceedings.
- Develop online platforms that allow full traceability from the extraction of products throughout the entire value chain.
- Build safeguards against manipulation, unauthorized access, and conflicts of interest, and provide public access for independent monitoring.



Examples of good practice

Brazil

[Using digital traceability to strengthen integrity in the timber value chain](#)

Brazil's [Forest Origin Document](#) (DOF) is a mandatory electronic licence for the transport and storage of native forest products. Operated at the federal level by the Brazilian Institute of Environment and Renewable Natural Resources (IBAMA), the system records information on the origin and movement of forest products and supports monitoring of their legality. The [DOF+ traceability system](#), introduced in 2022, strengthens this framework by assigning a tracking code that accompanies forest products from their origin to their final destination, enabling their provenance and movements to be monitored digitally. By improving transparency and oversight and making it easier to identify inconsistencies in supply chain records, digital traceability can strengthen monitoring and enforcement and reduce opportunities for illegal logging, document fraud, and related corruption risks.

Uruguay

[Mineral transport certificate system](#)

Uruguay requires a [Certificate/Guide for the Transport of Minerals or Rocks](#): a paper or electronic document that traces the transport of minerals or rocks within national territory, from point of extraction to destination, allowing authorities to verify the legal origin of the product at each stage.

OP 5 - Strengthen cross-border cooperation and enforcement controls

Resolution language

"Strongly encourages States Parties to take appropriate measures, in accordance with their domestic law and relevant international obligations, to strengthen cross-border cooperation and enforcement controls, including, where appropriate and on a voluntary basis, through the timely sharing of information among law enforcement agencies, including through regional organizations and, where appropriate, with INTERPOL;"

Why it matters

CAE frequently involves cross-border supply chains. Corruption enables illegally obtained wildlife, timber, fish, minerals, and other natural-resource products as well as waste to enter legitimate markets. These products may be illegally harvested or extracted in one country, processed or transported through others, and sold or financed elsewhere, while bribery, trading in influence, and other forms of corruption can conceal their origin. Because the actors, evidence, shipments, and proceeds span multiple jurisdictions, timely cross-border cooperation and sharing of information is crucial. Efforts to counter corruption linked to CAE in one country can shift criminal activities to neighbouring jurisdictions, making a coordinated approach essential to best address this challenge.

Key policy and implementation measures

- Designate national contact points and use secure channels, including INTERPOL National Central Bureaus, to exchange and verify time-sensitive information.
- Establish cooperation agreements among source, transit, destination, and financial-centre countries, including drawing on existing enforcement networks: relevant police, customs, fisheries, and forest-enforcement networks, and through other platforms provided by INTERPOL, UNODC, CITES, and other organizations.
- Share intelligence not just on seizure data but also on shipments, routes, individuals, companies, beneficial ownership networks, corrupt officials, and financial flows.
- Plan coordinated operations, joint investigations, controlled deliveries (see glossary for definition), and asset tracing with prosecutors and mutual-legal-assistance authorities involved early.



Examples of good practices

South and Southeast Asia

[Operation Dragon: investigating the corruption enabling wildlife trafficking](#)

The WJC worked closely with authorities in India and Malaysia and with INTERPOL on an intelligence-led investigation into the illegal freshwater turtle and tortoise trade. The investigation documented organized corruption at airports and other strategic transport hubs, where arrangements with officials enabled traffickers to move shipments with a reduced risk of detection. Intelligence gathered through the operation contributed to the disruption of eight major trafficking networks, 30 arrests, five custodial sentences, and the seizure of more than 6,000 reptiles. The example shows how identifying and investigating corruption as part of the trafficking network can support targeted, cross-border enforcement against high-level actors.

Europe and Southeast Asia

[Successful co-operation between UK and European authorities led to the conviction of a glass eel trafficker](#)

The UK's National Crime Agency (NCA) linked a glass eels' consignment recipient to a Companies House entry naming the beneficial owner, then used invoices and bank account records to trace payments, including transfers to the UK holding barn and shippers to Southeast Asia. The Crown Prosecution Service proved the beneficial owner controlled the operation, securing a conviction for illegal wildlife trafficking. The case highlights how cross-border cooperation and beneficial ownership disclosure (see also OP 13) can expose illicit financial flows linked to CAE.



OP 6 - Confidential reporting systems and protection of reporting persons

Resolution language

"Encourages States Parties, in accordance with their domestic law, to establish and strengthen confidential complaint systems and protected internal reporting systems that are accessible, diversified, reliable and inclusive in order to facilitate timely reporting of corruption as it relates to crimes that affect the environment and to ensure the confidentiality of reporting persons' identities and personal information, including, where appropriate, allowing for anonymous reporting;"

Why it matters

Public officials, employees, contractors, frontline workers, and community members may be the first to see bribes, falsified permits, diversion of seized goods, illegal extraction, or interference with inspections and prosecutions. If there are no safeguards and mechanisms to report, these illegal acts go unreported. Often, individuals reporting corruption face retaliation and unjustified treatment. OP 6 requires reporting systems that are accessible, reliable, diversified, inclusive and confidential, including anonymous channels where appropriate. Reporting persons should be able to choose among secure internal and external channels and should not be required to report to a person or institution implicated in the alleged wrongdoing. Special attention should be given to community whistleblowers and Indigenous and local communities living near extractive projects, who often face heightened risks of retaliation and practical barriers to reporting. Effective implementation also requires protection against retaliation, remedies and independent follow-up under UNCAC Article 33 and [Resolution 10/8 on the protection of reporting persons](#).

Key policy and implementation measures

- Fully implement UNCAC Article 33 and Resolution 10/8 through protection covering public and private-sector workers, contractors, former workers, applicants, community members and others who report suspected wrongdoing, as well as persons who assist or are associated with reporting persons.
- Provide multiple, secure and clearly publicized internal, external and independent reporting channels, including anonymous options and arrangements for remote and cross-border reporting. Reporting should be permitted in person, through telephone, mail, and secure digital systems.
- Ensure that reporting persons may report directly to an independent or competent external authority without first exhausting internal channels, particularly where internal reporting would be unsafe, ineffective, or create a risk of retaliation or concealment of evidence.

Key policy and implementation measures - *continued*

- Design systems for practical accessibility and inclusion, including plain and non-technical language, no-cost reporting, accessible formats, appropriate language options and accommodations for persons with disabilities, offline reporting options for persons without access to reliable or secure internet, and measures responsive to gender-specific and community-level risks.
- Establish clear procedures and timelines for acknowledging reports, assessing and investigating allegations, maintaining communication with reporting persons and providing information on follow-up and outcomes.
- Ensure reports are handled by trained, impartial personnel, with procedures to identify and manage conflicts of interest and alternative handling arrangements where persons responsible for receiving, investigating or deciding a report are implicated in the alleged wrongdoing.
- Incentives programs for whistleblower tips, where appropriate, may also be considered, particularly where information leads to recovery of public funds or proceeds of corruption.
- Establish clear procedures and reasonable timelines for promptly acknowledging and investigating reports, maintaining secure communication with reporting persons, requesting additional information, and conducting thorough and impartial investigations. Before conclusions are finalized, reporting persons should have a meaningful opportunity to comment on relevant findings, including to identify factual errors or omissions, provide additional evidence, respond to incomplete, misleading or false information, identify flaws in the analysis, and flag relevant evidence that was not considered or adequately addressed. Reporting persons should receive appropriate feedback on follow-up and outcomes and, with their consent and subject to confidentiality requirements, have the opportunity to be acknowledged for their contribution to the investigation.
- Protect confidentiality throughout intake, investigation and follow-up through data minimization, restricted access, secure storage and communications, and safeguards against direct or indirect identification of reporting persons. Anonymous systems should not collect or expose information that could permit identification or traceability.
- Prohibit retaliation, including dismissal, blocklisting, abusive litigation, surveillance, threats and harm to relatives, witnesses, facilitators or supporters. Anonymous reporters who are subsequently identified should remain eligible for protection.
- Provide prompt interim relief, legal and psychosocial support, compensation and physical protection. Use appropriate burden-shifting rules in retaliation proceedings and independently investigate alleged retaliation.
- Regularly evaluate reporting systems and collect and publish anonymized data on reports received, response and resolution times, follow-up, investigations and outcomes, retaliation complaints and protective measures, corrective actions recommended and taken, and periodically evaluate reporting systems for accessibility, confidentiality, security, responsiveness, and user trust.



Examples of good practice

United States

[Whistleblower review of investigative findings](#)

Under the U.S. Office of Special Counsel disclosure process, when a qualifying whistleblower disclosure is referred to a federal agency for investigation, the agency submits a report of its findings and the whistleblower is provided an opportunity to comment on the agency report. The whistleblower's comments accompany the report and any comments or recommendations of the Special Counsel when transmitted to the President and congressional oversight committees. This provides an important best practice example of whistleblower enfranchisement by allowing the reporting person to identify errors, omissions or other concerns with the investigation before the process is concluded.

European Union

[Minimum standards for secure reporting and follow up](#)

[The EU Whistleblower Protection Directive](#) provides a useful model for translating the general concept of a "reliable" reporting system into concrete procedural requirements. Covered public bodies and private entities must establish securely designated channels that protect confidentiality, acknowledge receipt within seven days, designate an impartial person or department to follow up, diligently assess reports, provide feedback generally within three months and clearly inform reporting persons about external reporting options. Member States must also provide aggregated statistics on reports to competent authorities, investigations and proceedings, outcomes, financial damage and amounts recovered.





OP 7 - Promote active civil society participation and raise awareness

Resolution language

"Calls upon States Parties to take appropriate measures, within their means and in accordance with the fundamental principles of their domestic laws, to promote the active participation of individuals and groups outside the public sector, such as civil society, non-governmental organizations and community-based organizations, in the prevention of and fight against corruption, and to raise public awareness regarding the existence and causes of, the gravity of and the threat posed by corruption as it relates to crimes that affect the environment;"

Why it matters

Civil society, journalists, Indigenous Peoples, local communities, and researchers help detect corruption, monitor environmental and climate impacts, and support those affected by environmental crime and corruption. In addition, civil society can play an important role in working with government authorities to promote change (eg. in policy development, training) and in the provision of technical assistance. OP 7 should therefore be meaningfully implemented as a commitment to active participation and public oversight, not only awareness-raising. Participation is not meaningful where people lack information, cannot influence decisions or face legal harassment, threats or violence in carrying out the work.

Key policy and implementation measures

- Adopt and effectively implement enabling laws and policies that align with the spirit and intent of Article 13 and international human rights standards, which is the foundation for ensuring a safe space for civil society actors to operate and the rights to freedom of assembly, association, and expression.
- Regularly review and revise national laws to ensure they comply with international standards, addressing any restrictive laws or measures that make it difficult for CSOs to operate.
- Institutionalise meaningful public participation in decision-making processes through adequately resourced mechanisms such as multistakeholder monitoring



Key policy and implementation measures - continued

committees (with access to project data), social audits of environment and climate projects, citizen feedback tools that generate structured feedback from affected communities etc. *Meaningful participation is contingent on the public (or civil society) having access to relevant information, adequate standing to raise views and concerns with competent authorities, and protection against retaliation.*

- Enable independent oversight through access to information, complaint and review mechanisms, ensure Free, Prior, and Informed Consent (FPIC) from communities and Indigenous Peoples before initiating projects that affect their environment, and support community-based monitoring of environmental governance, including monitoring of licensing, environmental commitments, social obligations and revenue management.
- Establish early warning, protection, and rapid-response mechanisms for civil society actors, journalists, community monitors, environmental defenders, and other civil society actors and investigate attacks and reprisals.



Examples of good practice

Amazon region

Civil-society monitoring through the Monitoring of the Andes Amazon Program

The Monitoring of the Andes Amazon Program (MAAP), led by Amazon Conservation, uses satellite imagery and other technologies to monitor deforestation, mining, logging, and other environmental threats. It works with local NGOs, Indigenous groups, and communities and shares findings with public authorities. Although MAAP does not investigate corruption directly, it can identify corruption risks by comparing observed activities with official permits and concessions. In Peru, a [MAAP analysis of logging roads and forestry permits](#) found activity outside authorized areas, in cancelled concessions, and under a permit lacking a required technical opinion. The protected-areas authority referred the case to environmental prosecutors and sought to annul the permit. More recently, a [MAAP analysis of increasing mining-induced deforestation along a river](#) in Colombia contributed to two binational enforcement operations with Brazil in 2025. The examples show how civil-society monitoring can expose irregularities and support enforcement.

Regional

Two regional bodies have recently strengthened protections for environmental transparency and defenders.

In April 2024, Latin America's [Escazú Action Plan on Human Rights Defenders in Environmental Matters](#), developed through an open, participatory process, set measures through 2030 to implement Article 9 of the Escazú Agreement, promoting recognition and protection of environmental defenders, stronger national mechanisms, and public participation in implementation and monitoring.



Examples of good practice - continued

Regional

In March 2026, the African Commission on Human and Peoples' Rights adopted the [Resolution on Access to Information and the Right to a Healthy Environment](#), calling on States to ensure timely and proactive disclosure of environmental information, public participation, access to justice, protection for journalists, environmental defenders, affected communities, as well as due diligence by businesses, particularly in the extractive, energy, agribusiness and infrastructure sectors. For impact, governments should translate these commitments into national laws, policies, and measures, strengthening public oversight and the prevention and detection of CAE and related corruption.



OP 8 - Promote integrity and transparency in public-private relations

Resolution language

"Further encourages States Parties, where appropriate and in accordance with their domestic law, to promote integrity and transparency in relations between the private and public sectors, including, where applicable, through preventing and managing conflicts of interest, preventing undue advantage and promoting and supporting the adoption of comprehensive integrity and compliance programmes in the private sector that effectively prevent corruption as it relates to crimes that affect the environment;"

Why it matters

Government-business engagement can create opportunities for investment and expertise, but also for undue influence and corruption. Undisclosed lobbying, political donations, conflicts of interest, revolving doors, and weak corporate compliance can distort environmental rules, contracts, and enforcement. OP 8 encourages States Parties to promote integrity and transparency between the private and public sectors, including by preventing and managing conflicts of interest, preventing undue advantage, and supporting integrity and compliance programmes in the private sector. In practice, this means transparency over lobbying and political finance, effective conflict-of-interest and revolving-door safeguards, and integrity standards for companies operating across the value chain.

Key policy and implementation measures

- Regulate lobbying and other forms of influence through public registers and disclosure of who is seeking to influence public decisions, identifying lobbyists, clients, officials contacted, issues discussed, meetings, spending, and gifts.
- Strengthen conflict-of-interest and revolving-door safeguards, including disclosure and recusal requirements, cooling-off periods and effective independent oversight and enforcement.
- Require companies seeking licences, concessions, or public contracts in the environmental sector to maintain risk-based anti-corruption programmes and disclose beneficial ownership information, agents, political contributions, and relevant integrity information.

Key policy and implementation measures - *continued*

- [Implement CoSP Resolution 11/7](#) on political finance transparency: publish financial reports in a timely way, with donors identified before election day above domestic thresholds, and consider restricting or prohibiting donations by legal entities, including anonymous, State, or foreign-owned or controlled entities and public contractors. Give oversight bodies the tools to verify donations, including by [cross-checking donors against databases of legal entities and public procurement contractors](#).
- Foster the implementation of Environmental, Social and Governance (ESG) frameworks in companies [across the value chain](#), from extraction and processing to trade, transport, finance and end markets.



Examples of good practice

Canada

[Lobbying transparency, revolving door limits, and a ban on corporate political donations](#)

Canada's federal Registry of Lobbyists publishes searchable registrations, and lobbyists must file monthly reports of their communications with designated public office holders. Former holders of those posts face a five-year restriction on most lobbying. Separately, section 363 of the Canada Elections Act 2000 permits political contributions only from Canadian citizens and permanent residents, excluding companies, unions and other legal entities- a ban [Transparency International](#) cites as good practice for implementing Resolution 11/7. No framework closes every channel of influence, and gaps remain. Even so, this example illustrates what OP 8 asks for in practice: measures that make relations between the private and public sectors transparent, that help identify and manage conflicts of interest before they shape decisions, and that limit the channels through which companies can secure undue advantage. This matters for the environment because corruption related to access to and use of natural resources is a recurring feature facilitating environmental crime, helping to make illegal activity appear lawful.

Enforcement and accountability

OP 9 - Liability of legal and natural persons

Resolution language

"Urges States Parties to promote accountability, integrity and transparency by taking the necessary measures, in accordance with the Convention and their domestic law, to hold liable any legal or natural persons subject to their jurisdiction that perpetrate an act of corruption as it relates to crimes that affect the environment;"

Why it matters

A natural person is an individual; a legal person is an entity such as a company. Corruption linked to CAE may be committed through companies, subsidiaries, intermediaries, and complex ownership structures. Accountability can fail if responsibility is attributed only to individual employees or, conversely, if a corporate case replaces investigation of responsible individuals. OP 9 calls for both companies and individuals to be held accountable.

Key policy and implementation

measures

- Establish criminal, civil, or administrative liability for companies involved in corruption linked to CAE, without making corporate liability dependent on the prosecution or conviction of an individual where domestic law permits.
- Apply effective, proportionate, and dissuasive sanctions, including fines, confiscation or equivalent monetary claims, debarment, licence restrictions, compliance orders, and other penalties appropriate to the offence.
- Investigate and, where supported by the evidence, prosecute responsible directors, officers, employees, beneficial owners, and intermediaries alongside corporate proceedings, including for relevant conduct committed abroad.

Key policy and implementation measures - *continued*

- Publish information on cases, charges, convictions, final orders, settlements, sanctions, confiscation, and remedies, including the reasons for discontinuing significant proceedings.
- Provide compensation, asset return, or other redress to affected countries and communities and publish information on these efforts.



Examples of good practice



Examples of accountability exist, but we have not identified a case that fully meets the intent of the operative paragraph. Information on charges, outcomes and penalties is often not publicly available in a form that allows assessment. This points to a gap that should be addressed in promoting implementation of Resolution 11/9.

Examples of accountability include [a corruption and money laundering case in Indonesia](#) concerning permits that enabled deforestation and [a Swiss penalty order](#) finding Glencore International AG liable for failing to prevent bribery by a business partner in connection with mining acquisitions in the Democratic Republic of Congo.





OP 10 - Detection, investigation, prosecution, and adjudication

Resolution language

"Urges States Parties, in accordance with their domestic law, to take the measures necessary to strengthen their capacity to effectively detect, investigate, prosecute and adjudicate corruption as it relates to crimes that affect the environment, in particular as it relates to organized crime, money-laundering and illicit financial flows derived from the proceeds of crime, including by, inter alia, improving coordination and promoting cooperation among relevant competent authorities, by making use of, where appropriate, Articles 49 and 50 of the Convention to provide for joint investigations and special investigation techniques and by ensuring that such entities may carry out their functions effectively and free from any undue influence by providing them with the necessary resources;"

Why it matters

Environmental cases are often pursued only against low-level offenders, leaving the corruption, financial flows, and organized networks behind them untouched. OP 10 calls for the full criminal-justice system to detect, investigate, prosecute, and adjudicate these cases, including through joint investigations and special investigative techniques (surveillance, controlled deliveries, interception of telecommunications, undercover operations) under UNCAC Articles 49 and 50. It also calls for implementing relevant resolutions, including Resolution 10/5, to address corruption involving organized criminal groups. These advanced investigation techniques are vital to map supply chains, identify corrupt facilitators, and dismantle networks across borders. OP 10 builds upon the commitments in Resolution 8/12, which also called for financial investigations. OP 10 also requires capable and independent government institutions carrying out these investigations.

Key policy and implementation measures

- Put in place the laws, procedures, safeguards, and training needed to use joint investigations and special investigative techniques effectively and to ensure evidence obtained is protected and admissible in court, and increase their use in appropriate cases.
- Establish agreements or arrangements enabling competent authorities, such as investigators, prosecutors, judicial authorities, and environmental authorities, to form joint investigative teams at the national or local level.
- Create multi-agency case teams at the domestic and international level bringing together environmental authorities and regulators, anti-corruption bodies, police,



Key policy and implementation measures - continued

customs, FIUs, tax authorities, supreme audit institutions, and prosecutors and establish or strengthen dedicated offices or units tasked with investigating corruption cases involving organized criminal groups. Pursue corruption and parallel financial investigations from the outset, including links to other trafficking, fraud, organized crime, and money-laundering.

- Protect investigative and prosecutorial independence and provide specialist resources.



Examples of good practice

United States

Combating money laundering related to wildlife crime

A relevant example of money laundering linked to wildlife crime is the [Operation Apex case](#). In 2020, 12 individuals and two businesses were charged with conspiracy involving drug trafficking, money laundering, wire fraud, and mail fraud. Over a 10-year period, the group allegedly smuggled shark fins and totoaba swim bladders from Mexico to Hong Kong SAR via the United States, while also conducting inter-state drug trafficking within the United States. According to the indictment, members of the network used falsified documents, shell companies, cash couriers, and dozens of bank accounts to move large cash amounts through third-party businesses dealing in gold, precious metals, and jewels across the United States, Mexico, and Hong Kong SAR. Although shark-fin trafficking formed a significant part of the group's activities, the charges were ultimately anchored in other serious crimes, particularly drug trafficking, and in ancillary offences such as money laundering. The case highlights the critical importance of using money-laundering charges as an alternative and effective prosecution tool for tackling CAE.

France/Belgium

The 2025 White Paper [Systematising Financial Investigations to Combat Environmental Crime in Europe](#), developed through collaboration between French and Belgian judicial, prosecutorial, financial and academic experts, promotes placing financial investigations at the heart of environmental-crime investigations, including through systematically tracing financial flows, using advanced investigative technologies, strengthening cross-border cooperation, and improving the prosecution of CAE.

International cooperation, asset recovery, and following the money

OP 11 - Denying safe haven and recovering proceeds and instrumentalities

Resolution language

"Encourages States Parties, in accordance with their domestic law, to take the measures necessary to prevent the transfer abroad of the proceeds of corruption as it relates to crimes that affect the environment by denying safe haven and enhancing mutual cooperation in the identification, tracing, freezing, seizing, confiscation and recovery of proceeds or other property and instrumentalities of crime and their disposal and return, in line with the Convention and making use, as appropriate, of the various tools available to enhance international cooperation, including through the United Nations Office on Drugs and Crime and other international organizations, such as INTERPOL, including the INTERPOL silver notice system;"

Why it matters

Proceeds and assets linked to environmental corruption are often moved into bank accounts, property, companies, vessels, or luxury assets in other jurisdictions to disguise their origin and avoid punishment for the illicit activities. Tracing, freezing, confiscating, and returning these assets can remove criminal profits, disrupt criminal networks, and provide vital resources to remediate environmental damage and support affected communities. OP 11 applies the full UNCAC asset-recovery process, including for countries to deny safe haven and to make use of the various tools available to strengthen cooperation.

Key policy and implementation measures

- Begin parallel financial and asset-tracing investigations at the outset of significant corruption linked to CAE cases, using beneficial ownership, law enforcement, and financial-intelligence, tax, customs, and ensuring information from both domestic and international sources. Assets identified and seized may extend beyond cash and bank accounts to include luxury villas, vehicles, and other high-value property, as well as illicitly obtained natural resources themselves, such as seized ivory, rhino horn, or timber.

Key policy and implementation measures - *continued*

- Strengthen rapid domestic and international freezing, confiscation, and non-conviction-based forfeiture tools where consistent with domestic law, using the Global Operational Network of Anti-Corruption Law Enforcement Authorities (GlobE), Stolen Asset Recovery Initiative ([StAR](#)), Camden Asset Recovery Inter-agency Network (CARIN)-style networks and INTERPOL [Silver Notices](#).
- Ensure transparency and accountability throughout asset recovery and return in line with [recommendations of the Coalition's Asset Recovery Working Group](#); publish accessible information on assets frozen, confiscated and returned, relevant cases, methodologies and return agreements; publish asset-recovery statistics at least annually; and involve civil society and affected communities in oversight and consultation on asset returns.
- Implement existing UNCAC and CoSP commitments on transparent and accountable asset recovery, including [Resolutions 6/3 on strengthening asset recovery](#) to support the 2030 Agenda for Sustainable Development and [9/2 on following up to the UNGASS Political Declaration against Corruption](#).
- Return and dispose of assets transparently and accountably, prioritizing remedies for affected communities and environmental restoration where appropriate.



Examples of good practice

Madagascar - Thailand

[Wildlife asset tracing](#)

A major seizure in Thailand in 2024 led to a joint [Thai-Malagasy](#) investigation that uncovered a transnational trafficking network, leading to arrests, the freezing of bank accounts, and the confiscation of vehicles and vessels. In 2025, Madagascar's Anti-Corruption Court convicted ten individuals for wildlife trafficking, money laundering, and criminal conspiracy, imposing prison sentences and approximately USD 8.7 million in penalties and damages. The case demonstrates the value of cross-border cooperation, financial investigations, and asset recovery in combating CAE.



Examples of good practice - continued

South Africa

[Using recovered criminal assets to support anti-corruption and law enforcement efforts](#)

South Africa's Criminal Assets Recovery Account (CARA) receives funds and property confiscated under court orders and channels them towards public-interest purposes, including strengthening [law-enforcement](#), [anti-corruption efforts](#), and [compensation for victims](#). In 2026, funds [from CARA were allocated to support a new national organized-crime task team](#), targeting organized crime and corruption across the public and private sectors, including the infiltration of state institutions by criminal networks, corruption linked to government contracts and public entities, and wider criminal activity. The mechanism demonstrates how recovered criminal assets can be reinvested to build law-enforcement capacity and support efforts to disrupt serious crime and corruption.



OP 12 - Strengthen cooperation in criminal, civil, and administrative matters

Resolution language

"Calls upon States Parties to strengthen cooperation in criminal matters and, where appropriate and consistent with their domestic legal system, to consider assisting each other in investigations of and proceedings in civil and administrative matters relating to corruption as it relates to crimes that affect the environment, in line with chapter IV of the Convention;"

Why it matters

Criminal actors aim to disguise their operations by spreading evidence, witnesses, companies and assets across jurisdictions. Cross-border cooperation to dismantle these operations and pursue criminal, civil, and administrative sanctions is therefore essential. Tools that countries can use include extradition, mutual legal assistance, transfer of proceedings in criminal matters, and joint investigations. OP 12 calls for this broader cooperation under UNCAC Chapter IV (focused on international cooperation).

Key policy and implementation measures

- Sign Mutual Legal Assistance (MLA) Agreements for sharing information and evidence.
- Resource central authorities and specialist focal points to process requests promptly, with clear procedures, secure transmission, translation support, and direct contact channels.
- Enable cross-border data- evidence-sharing and assistance for civil and administrative proceedings, including confiscation, compensation, regulatory enforcement, and licence suspension or revocation.
- Use joint investigation teams, regional judicial networks, and coordinated proceedings, involving asset-recovery and regulatory authorities from an early stage.
- Cooperate early with foreign counterparts in transnational cases.



Key policy and implementation measures - *continued*

- Track and publish aggregate data on requests, response times, outcomes, obstacles, and assets affected, while protecting investigations and personal data.
- Fully leverage existing facilitation mechanisms, including the Global Operational Network of Anti-Corruption Law Enforcement Authorities, INTERPOL, UNODC (eg. WIRE meetings), and other relevant international law enforcement networks.



Examples of good practice

Italy - Germany

Waste trafficking and money-laundering case

The European Union Agency for Criminal Justice Cooperation (Eurojust) supported a joint investigation team, coordination meetings, and a coordinated action against an organized network suspected of waste trafficking and money laundering. The joint action day led to 40 searches, 14 arrests, and the preventive seizure of EUR 90 million worth of assets.

Operation Amazonas

Joint action against illegal timber trafficking

Through Operation Amazonas, a coordinated operation involving five countries, INTERPOL, and the World Customs Organization, authorities uncovered the trade in illegally harvested timber and the use of fraudulent permits to launder timber into legal supply chains. The operation demonstrates the value of joint investigations and cross-border law-enforcement cooperation in addressing environmental crime enabled by corruption.

OP 13 - Enhance use and sharing of beneficial ownership information

Resolution language

"Also calls upon States Parties, in accordance with their domestic law and existing international commitments, to enhance the use and sharing of beneficial ownership information to strengthen efforts to prevent and combat corruption as it relates to crimes that affect the environment and to ensure that such information is available to relevant competent authorities in accordance with the applicable requirements under their domestic law;"

Why it matters

Opaque ownership structures can hide who controls and benefits from concessions, permits, contracts, vessels, and commodity trades, conceal conflicts of interest, and obstruct investigations and asset recovery. OP 13 applies earlier UNCAC beneficial ownership commitments directly to environmental corruption and emphasizes the use and sharing of information, not disclosure alone. Effective implementation requires accurate, verified, and usable data. Ownership data must be collected and maintained in a structured way, enhancing its usability and allowing for timely sharing of information and integration into natural resource governance.

Key policy and implementation measures

- Fully implement [CoSP Resolutions 9/7 enhancing the use of beneficial ownership information to facilitate the identification, recovery and return of proceeds of crime](#) and [10/6 enhancing the use of beneficial ownership information to strengthen asset recovery](#) and Financial Action Task Force (FATF) Recommendations 24 and 25 through central registers containing adequate, accurate, up-to-date, verified, and historical ownership information for legal vehicles and arrangements.
- Require disclosure and verification of direct and indirect ownership and control, including politically exposed person status, for natural-resource licences, concessions, quotas, vessels, and relevant public contracts.
- Provide rapid, effective, and direct access for competent authorities and make core information publicly and freely available in searchable, structured formats, without undue barriers.

Key policy and implementation measures - *continued*

- Designate government agencies with relevant environmental oversight responsibilities — such as mining, fisheries and forestry regulators — as competent authorities with access to beneficial ownership information.
- Use and exchange data on beneficial ownership, licensing, procurement, conflict-of-interest checks, financial investigations, international cooperation and asset recovery.



Examples of good practice

Nigeria

Ownership data in extractive oversight

Nigeria established a public extractive-sector beneficial ownership register through the EITI, and a public full-economy corporate register that features beneficial ownership data structured using the [Beneficial Ownership Data Standard](#). Public access to usable data facilitates regulatory and public scrutiny and analysis, such as that carried out by Joining the Dots through the [Opening Extractives](#) program. This initiative has linked ownership information with licence and politically exposed person data to identify red flags.

Mongolia

Exposing connections in mining industry

The [Mongolian Data Club](#) launched an initiative to reveal hidden connections within the mining sector, analysing open data on company ownership, public procurement, and asset declarations. The Data Club has pushed for better availability and quality of information and trained journalists to use this information to fill transparency gaps.

OPs 14 and 15 - Preventing the misuse of financial institutions and service providers

Resolution language

OP 14: *"Encourages States Parties to strengthen, within their means and in accordance with the Convention and their domestic law, comprehensive domestic regulatory and supervisory regimes for banks and non-bank financial institutions, including natural or legal persons that provide formal or informal services for the transmission of money or value and, where appropriate, other bodies particularly susceptible to money-laundering, within their competence, in order to assess and address, consistent with domestic law, their potential role in facilitating or enabling offences under the Convention insofar as they relate to crimes that affect the environment;"*

OP 15: *"Urges States Parties, in accordance with their domestic law and within their competence, to engage, where appropriate, with relevant service providers to promote the establishment and strengthening of effective internal controls and oversight of such controls in order to detect and deter suspicious activity and prevent the potential misuse of their services to facilitate corruption offences and related illicit financial flows derived from crimes that affect the environment;"*

Why it matters

Corrupt payments and proceeds linked to CAE may move through banks, money-transfer systems, trade finance, shell companies, real estate, precious-metals markets, and professional services. Financial institutions and service providers can help identify and disrupt these flows, but their services may also be misused - knowingly or unknowingly - to conceal ownership, transactions, and proceeds. OP 14 addresses regulation and supervision, while OP 15 focuses on effective controls within service providers. Both are needed to prevent, detect and sanction activity that facilitates corruption and related financial flows.

Key policy and implementation measures

OP 14: Strengthening regulation and supervision of financial institutions and other high-risk entities

- Include environmental crime and related corruption in national and sectoral money-laundering risk assessments, and ensure that relevant environmental offences are predicate offences for money laundering.
- Require financial institutions and other regulated entities to apply risk-based customer and beneficial-ownership due diligence, politically exposed person

Key policy and implementation measures - *continued*

screening, source-of-funds and source-of-wealth checks, transaction monitoring, and suspicious transaction reporting.

- Issue environmental-crime and corruption typologies and red flags; test controls through risk-based supervision; strengthen financial-intelligence analysis, parallel financial investigations, and cooperation among financial, environmental, and enforcement authorities.

OP 15: Strengthening internal controls among relevant service providers

- [Apply anti-money laundering obligations to high-risk services](#), including company and trust formation, real-estate transactions, management of client funds, relevant legal and accounting services, and dealing in precious metals and stones, regardless of which profession provides them.
- Require customer due diligence, beneficial ownership identification, enhanced checks on politically exposed persons including determining the source of their funds and wealth, record-keeping, internal controls and suspicious transactions reporting.
- Limit legal professional privilege to core legal advice and representation so that it does not shield corporate or financial services.
- Establish effective, risk-based, and independent supervision. In countries where supervision is delegated to self-supervisory bodies and professional associations, governments should task the existing government agency with powers to oversee the supervisory activities of such bodies. In addition, countries should critically evaluate the effectiveness of self-regulatory supervisory frameworks, and consider subjecting professional service providers to supervision by a designated national authority.
- Ensure that the supervisory body has adequate mandate, powers and resources and that this applies (should apply to both cases of supervisor being a government entity or self-supervisory body).
- Apply proportionate and dissuasive sanctions to both natural and legal persons, including licence suspension or withdrawal for serious breaches, and investigate providers that knowingly facilitate offences or repeatedly fail to meet anti-money laundering duties. Provide avenues for compensation or collective claims where serious failures contribute to harm.





Examples of good practice

Australia

Extending anti-money laundering obligations to gatekeepers

From 1 July 2026, Australia extended its anti-money laundering and counter-terrorism financing (AML/CTF) requirements to include real estate agents, lawyers, conveyancers, accountants, and dealers in precious metals and stones. Covered businesses must implement risk-based anti-money laundering programmes, conduct customer due diligence, keep records, and report suspicious matters. [Civil society](#) strongly welcomed the [2024 reforms](#) as closing a longstanding gap but expressed concern about the loophole for legal professional privilege.

Strengthening public-private cooperation to detect environmental crime-related financial flows

Following FATF recommendations, UNODC in cooperation with INTERPOL and the World Resources Institute, organizes Private Sector Dialogues to strengthen efforts to detect and disrupt financial crimes linked to CAE. Bringing together anti-money laundering and countering-the-financing-of-terrorism (AML/CFT) authorities, financial institutions, law enforcement agencies, and civil society, the Dialogues facilitate the exchange of information on emerging risks and typologies, helping participants strengthen internal controls, identify suspicious activity, and prevent the misuse of services. The initiative also supports INTERPOL and law enforcement authorities in identifying new financial crime risk indicators and typologies at an early stage, enabling more effective enforcement responses.

Project Anton: public-private financial intelligence against illegal wildlife trade

Project Anton brings together financial intelligence units across the globe, including in Canada, Australia, the UK, and South Africa, as well as financial institutions, environmental and enforcement agencies, and international and non-governmental partners. The partnership developed [financial indicators](#) to help regulated businesses identify and report transactions linked to the trade. In 2024–2025, Canada's FIU, FINTRAC (Financial Transactions and Reports Analysis Centre of Canada) generated 24 disclosures of actionable financial intelligence identifying 173 subjects for Canadian law-enforcement agencies and international partners. The example shows how engagement with financial institutions can help detect and disrupt illicit financial flows from an environmental crime closely linked to corruption.

The final four paragraphs in Resolution 11/9 provide the institutional follow-up to put the resolution's commitments into action through the Working Group on Prevention agenda item, UNODC technical assistance, a report to CoSP12, and donor funding. Each call to action is a concrete civil society advocacy entry point. The "Civil society can" rows below set out how to use them.

OP 16 - Working Group on Prevention agenda item

Resolution language

"Directs the Open-ended Intergovernmental Working Group on the Prevention of Corruption to include, as a topic for discussion at its seventeenth or eighteenth session, good practices, lessons learned and challenges concerning the use of anti-corruption and integrity tools to address corruption as it relates to crimes that affect the environment in order to identify needs and to inform technical assistance, capacity-building and national policy development efforts and support the effective implementation of the Convention;"

Why it matters

This is an important follow-up measure to promote implementation and the reporting thereof among States Parties. Ahead of the Prevention Working Group's 18th session (24-28 May 2027), the UNODC should circulate a questionnaire to States, inviting them to submit detailed information on their practices and challenges relating to the resolution commitments; the UNODC will later synthesize the information into a written report paper which will be published presented at CoSP 12. At the Prevention Working Group meeting, a panel discussion with experts nominated by States will be held, to share and discuss implementation efforts. The Working Group may wish to consider and adopt recommendations moving forward, based on the Working Group's discussion. While civil society organizations are not allowed to observe the Prevention Working Group meetings (or other UNCAC subsidiary meetings), Civil society representatives may ask to join some State delegations for this meeting and ask to nominate an expert civil society representative for the panel discussion, conduct advocacy with States to shape their responses to questionnaires and statements during the Prevention Working Group discussions.





Civil society can..

- Encourage Governments to respond to the UNODC questionnaire once sent out, publish it on the Prevention Working Group website, as per-practice, and to include civil society relevant input and perspectives in their responses. Input can include documented good practices, gaps, and case evidence.
- Advocate for governments to actively participate in the Prevention Working Group session in 2027, request to be part of government delegations at the Working Group meetings, organize events on the sidelines of Working Group meeting, and make their own written submission, as well as contribute to a comprehensive Environmental Crime and Corruption Working Group written submission which will be developed ahead of the Prevention Working Group meeting.
- Use the Secretariat's background paper and States' submissions to questionnaires (if made public) as accountability benchmarks in national advocacy afterwards.

OP 17 - UNODC technical assistance

Resolution language

"Takes note of the work undertaken by the United Nations Office on Drugs and Crime in the development of technical assistance programmes aimed at preventing and combating corruption as it relates to crimes that affect the environment;"

Why it matters

Many government agencies working on the prevention, investigation, and prosecution of CAE and related corruption face capacity constraints, including shortages of personnel, specialized training, funding, and equipment. Strengthening technical assistance and capacity-building is therefore essential. UNODC, in response to the requests received by countries, delivers technical assistance. As a result, countries are able to strengthen institutions managing natural resources through corruption risk management processes, adopt robust legislation, generate coordination mechanisms, enhance investigative capacities and evidence gathering, disrupt illicit financial flows, unveil beneficial owners, and adopt action against professional enablers. This OP in combination with OP 19 (resources) and OP 16 (identifying needs), confirms a mandate basis for continuing and expanding this work, building upon the technical assistance commitment in Resolution 8/12. Civil society actors should play a role in technical assistance, both as providers and recipients. [The UNGASS political declaration](#) recognizes this, inviting States to consider involving civil society in technical assistance (paragraph 21).



Civil society can..

- Encourage their governments to request UNODC technical assistance to combat CAE-related corruption, such as carrying out risk assessments, legislative reviews, and training, including for law enforcement, prosecutors, and judges, and to involve civil society actors in its design, delivery, and evaluation;
- Partner with UNODC country and regional offices and other international organizations and donors as implementers, trainers, and sources of national, local, and global knowledge;
- Advocate for technical assistance transparency: publication of programme objectives, funds provided, partners, and outcomes, so that outcomes and impact can be assessed.



OP 18 - UNODC's implementation report to CoSP12

Resolution language

"Requests the Secretariat of the Conference of the States Parties to report, within existing resources, on the implementation of the present resolution to the Conference at its twelfth session and to its relevant subsidiary bodies;"

Why it matters

This requests the UNCAC Secretariat to report on implementation of the resolution to CoSP12 (Uzbekistan, December 2027), and to the UNCAC subsidiary bodies. This UNODC report will build on the information States have sent on their implementation efforts implement in response to the Questionnaire sent to them ahead of the 18th session of the Prevention Working Group, and on the panel discussion held during the session. For civil society, the report can be both a target (shaping what governments submit) and a tool (an official record showing progress and challenges, citable in national and global advocacy). It also sets the baseline for what could come next: gaps documented in a written CoSP12 report, as well as good practices, can become the basis for future resolution commitments.



Civil society can..

- Track whether and what their government submits in response to the Secretariat's Questionnaire and publish civil society assessments of national implementation against each OP—this guide's structure can serve as the monitoring framework;
- Provide documented evidence to the Secretariat and UNODC through Coalition channels, side events and written submissions, so that the official record reflects civil society experience and realities on the ground;
- Use the report at CoSP12 to brief delegations, assess progress, and build the case for stronger implementation of the resolution as well as new calls to action to address gaps or emerging issues.



OP 19 - Extrabudgetary resources

Resolution language

"Invites Member States and other donors to provide extrabudgetary resources for the purposes set out in the present resolution, acknowledging that such extrabudgetary resources are subject to the rules and procedures of the United Nations, and requests the United Nations Office on Drugs and Crime to utilize any such extrabudgetary resources efficiently and effectively."

Why it matters

This is standard, and important, language in CoSP resolutions laying out the need for donor support to implement the follow-up actions in the resolution and to assist governments to implement the calls to action. Civil society can advocate for donors to provide funds to support resolution implementation and seek to be a partner in some of this work (such as in the provision of technical assistance or as a recipient).



Civil society can..

- Advocate with donor governments, including co-sponsors, and environment, climate, biodiversity, and governance funders to finance implementation of Resolution 11/9, including civil society engagement in monitoring and technical assistance (see examples of good practices in the paragraph-by-paragraph analysis and in the [Environmental Crime and Corruption Working Group's compendium of good practices](#));
- Document the costs of inaction (eg. lost revenues, ecosystem destruction, organized crime profits, see [Chapter 1](#) for more details) in national contexts and/or the positive outcomes made likely through taking action (increased and sustainable revenues, ecosystem preservation, governance integrity and citizen trust, respect for the rights of Indigenous Peoples and other groups) to make the case for why funding is needed;
- Press for much-needed [transparency](#) in how extrabudgetary resources are allocated and what they achieve.



Applying the UNCAC to strengthen climate finance governance: making linkages with Resolution 11/3, the first CoSP language calling for climate finance governance

At CoSP11, States Parties also adopted Resolution 11/3 on promoting UNCAC implementation in small island developing States (SIDS). For civil society advocates working on environmental crime, corruption, and climate governance, the two resolutions can be used together to generate greater momentum for action at the national level on tackling these interlinkages. Resolution 11/3 explicitly addresses corruption in the context of climate change and climate finance and recognizes the links between corruption, CAE, and the mismanagement of sustainability finance, alongside natural resource management. Its operative paragraphs call for strengthening anti-corruption safeguards in climate finance and for transparency, accountability, and participation in climate action and natural resource governance in SIDS.

Both Resolution 11/3 and Resolution 11/9 carry the first explicit CoSP recognition of Indigenous Peoples and local communities. In national advocacy, particularly in SIDS and climate-vulnerable countries, civil society can use 11/9 for the anti-corruption toolkit (integrity in licensing, beneficial ownership, asset recovery, enablers) and 11/3 for the climate finance and SIDS-specific commitments, presenting them together as part of a set of reforms to be implemented at the national level. Resolution 11/9's anti-corruption toolkit is also directly applicable to corruption risks and accountability deficits in climate finance flows. As climate finance expands rapidly, so too do the risks of elite capture, discretionary allocations, procurement irregularities, and a lack of civil society and community oversight. These risks are compounded by complex multi-actor structures, which often involve global funds, national designated authorities, direct access entities, and subnational implementers. This dilutes chains of accountability and responsibility. See the Coalition's [analysis of CoSP11 resolutions](#) for more information and detailed analysis for both resolutions.

For specific examples of cases related to climate corruption, please see [TI's Climate Corruption Atlas](#), which also includes best practices examples related to whistleblowing protection, access to information, community participation and other issues.

The [Climate and Social Accountability Resource Guide](#) provides a practical framework for civil society to design and sequence accountability in climate governance contexts. This includes strategies for political economy analysis, coalition building, and engaging [reluctant duty-bearers](#). The guide also highlights social accountability tools directly applicable to the oversight of climate finance institutions. For civil society working in SIDS, the guide's modular approach allows adaptation of initiatives to resource-constrained environments with limited civic capacity, or restricted civic space.

3



Guidance for civil society

Promoting the implementation of
Resolution 11/9

- **3.1 Action at the national level: leveraging the resolution to tackle corruption linked to CAE**
- **3.2 Feed into the resolution's follow-up process in UNCAC fora to reflect national experiences**
- **3.3 Amplifying civil society voices at the global level: coordinating through the ECC WG**

Putting Resolution 11/9 to work

What this guidance covers

This section provides practical guidance for civil society actors on:



How to put Resolution 11/9 to work in their own countries to **advance national action**.



How to feed national experiences back into **the global UNCAC process**, strengthening legal frameworks and implementation and raising standards globally.



How civil society, including through the Coalition's ECC WG, can turn individual efforts into **a collective force** to advocate for stronger global action through multilateral processes.

The cycle the guide is built around

National implementation generates good practice, exposes gaps and challenges, and produces the evidence civil society can bring to global UNCAC discussions (see Chapter 3.1.1). Those moments on the UNCAC-fora timeline, in turn, generate recognition and pressure, create momentum for further national reform, and build the case for stronger standards.



Who is it for?

It is aimed at different types of civil society actors, such as a small national CSO, a community organization and a well-resourced international coalition. As not every organization will have the capacity to do everything set out here, the guide has been made deliberately broad: each can find an entry point that supports its mandate, matches its resources and expertise. That might mean writing a single letter to a country delegation, producing detailed recommendations on how a government should implement a specific commitment, offering training and technical support, or coordinating a multi-country monitoring exercise.

			
Writing a single letter to a country delegation	Producing detailed recommendations on implementing a specific commitment	Offering training and technical support	Coordinating a multi-country monitoring exercise

When should it be used?

This guide will serve civil society in engaging with the follow-up actions as set out in operational paragraphs 16-19 (analysed in [Chapter 2](#)) of Resolution 11/9, as well as with longer-term opportunities arising through the second phase of the UNCAC Implementation Review Mechanism (IRM) and future CoSP cycles.

- Follow-up actions — operational paragraphs 16–19**
The immediate mandate under Resolution 11/9, analysed in [Chapter 2](#).
- The IRM’s second phase, the CoSP and the UNCAC Working Groups**
As States Parties undergo a new round of country reviews, this is an important moment for civil society to become familiar with the Convention’s monitoring cycles and to use them systematically: the review process itself, the Conference of the States Parties, and, where relevant, the meetings of the UNCAC Working Groups (the Convention’s subsidiary bodies). Each is an opportunity to document progress, expose gaps and press for stronger action, and each offers a route for bringing national experience to the multilateral level.
- CoSP12 — Uzbekistan, 2027**
The next CoSP milestone; the guidance that follows includes how to engage in the run-up. The same approach applies to the CoSP cycles that come after.

Implementation is best pursued as a **sustained campaign** rather than a one-off push around a single Conference — that is what delivers meaningful change and sustainable impact on the ground.

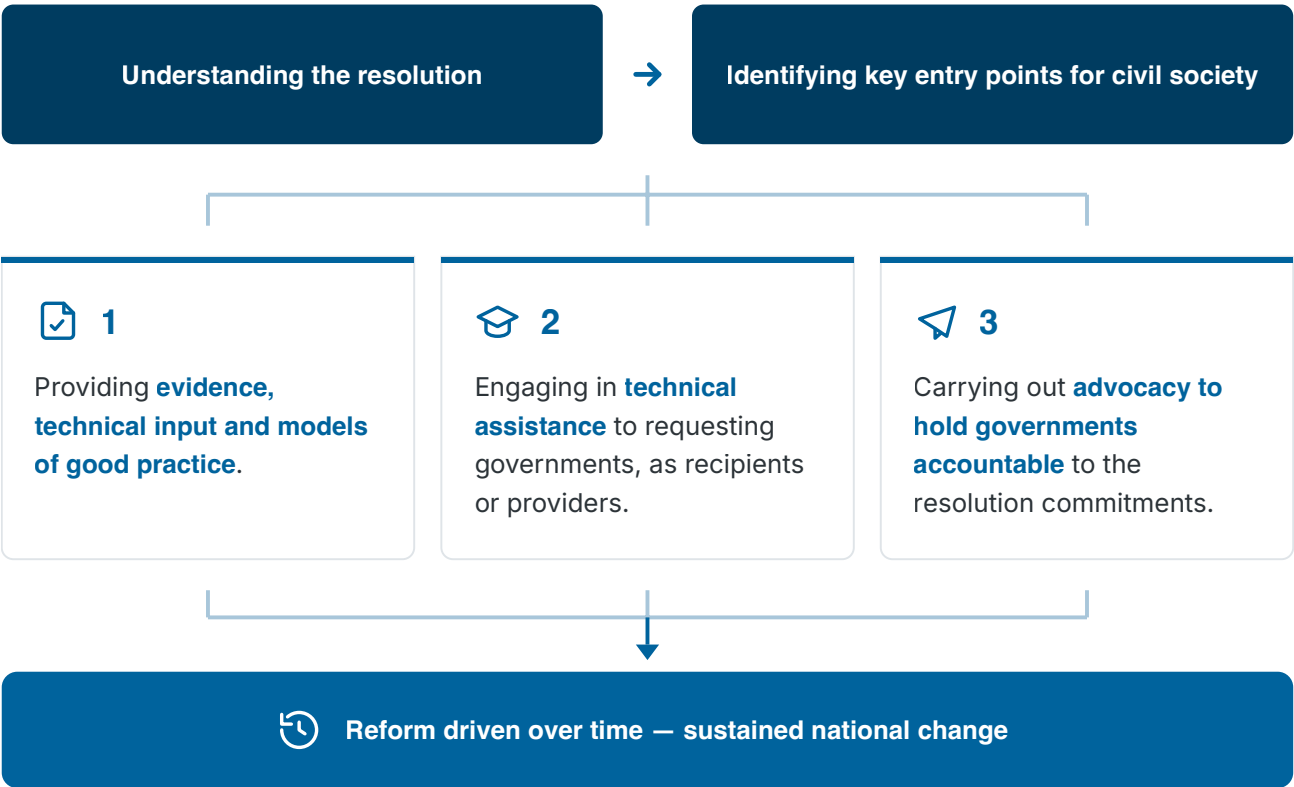
3.1 Action at the national level: leveraging the resolution to tackle corruption linked to CAE

It is at the national level that anti-corruption frameworks are written, licences and concessions are granted, financial systems are supervised, whistleblowers are protected or exposed, and cases are investigated and prosecuted.

Resolution 11/9 gives civil society a consensus mandate, agreed by all States parties, to press for each of these frameworks to be turned against the corruption that drives CAE.

From understanding the resolution to driving reform

The sections below move from understanding the resolution, to identifying key entry points for civil society to use it to drive reform over time.



3.1.1 Identifying resolution commitments at the national level

Below illustrates how commitments within Resolution 11/9 can help civil society actors advance their national priorities and inform their advocacy plans on issues relating to CAE.



Prioritize the calls to action most relevant to your context

Identify which of the OPs listed in [Chapter 2](#) are most relevant to your country’s environmental crime and corruption landscape, and to your organization’s priorities and advocacy objectives on ECC related issues. For example, countries with:

Important extractive sector	Financial centre	Forest- or fisheries-dependent
Licensing, liability, and beneficial-ownership commitments	Asset recovery, financial supervision, and corruption enablers	Transparency, traceability, and community participation
OP 2 OP 8 OP 9 OP 13	OP 11 OP 14 OP 15	OP 3 OP 4 OP 7

CONSIDER YOUR COUNTRY’S ROLE

Countries should also consider their role in the trafficking of natural resources or waste or in the illicit financial flows chain - whether as a source, transit, destination country, or as a jurisdiction through which illicit flows pass - since tackling corruption linked to transnational organized crime requires coordinated action across the full trafficking chain. Such countries should prioritize enforcement commitments, together with international cooperation and asset recovery

OP 5 OP 10 OP 11 OP 12

**RELATED RESOLUTION COMMITMENTS YOU CAN BRING IN**

Depending on the resolution commitments you prioritize, you can also bring in other related resolution commitments, such as Resolution 11/3 on SIDS (climate finance, natural-resource governance and the first CoSP recognition of Indigenous Peoples and local communities), Resolution 10/5 on preventing and combating corruption involving organized criminal groups, [Resolution 11/11](#) on “Combating corruption that facilitates the smuggling of migrants” (see box on crime convergence) and the wider UNCAC framework — notably Articles 5, 13 and 33.

2

Identify the gap between commitment and practice

For each priority OP, identify the gaps or challenges in your country that need to be addressed. Possible questions to ask are:

- Does a law or policy already exist?
- Is it implemented in practice and what are the outcomes and impact of implementation and enforcement efforts?
- Which government agencies are responsible?
- Are these agencies working together to conduct joint or parallel investigations?

3

Adapt to your national context

Resolution language is deliberately broad so it fits very different legal systems. The “Key policy and implementation measures” elements in [Chapter 2](#) are starting points for turning each commitment into a concrete national ask, whether this is a new law, regulation, commitment, policy or action. Use the commitments to support your national level advocacy priorities.



Once you have a plan in place, you should map which government actors to engage with...



3.1.2 Who to engage: Mapping government actors for implementation of Resolution 11/9

Implementation of Resolution 11/9 will involve institutions across government, not only environmental and anti-corruption authorities. Their names, mandates, and responsibilities will differ by country and may sit at national, subnational or local levels. In some contexts, Indigenous authorities may also have relevant rights and responsibilities. Civil society can use this chart to identify which bodies control relevant policies, information, resources, policy development, and enforcement powers, and which government agencies should be included in an implementation or advocacy plan.

Government function	Government institutions and actors to consider	Possible role in implementing Resolution 11/9
UNCAC coordination and representation	National UNCAC focal point; institutions coordinating UNCAC implementation and the Implementation Review Mechanism; officials completing self-assessment checklists and organizing country visits; delegations to the Conference of the States Parties, Implementation Review Group and Working Group on Prevention; ministries of foreign affairs; permanent missions in Vienna; bodies coordinating UNODC technical assistance.	Coordinate and promote national implementation and civil society engagement in these efforts; include corruption as it relates to CAE in UNCAC reviews and self-assessments; report on progress; request technical assistance; and represent national positions in Vienna.
Central policy, integrity and oversight	Ministries of justice, governance, public administration, and anti-corruption; anti-corruption commissions; presidency, prime minister's office or cabinet; relevant parliamentary committees; supreme audit institutions; inspectors-general; ombuds institutions; public-service commissions; access-to-information commissioners; Open	Develop national policies; assess corruption risks; coordinate institutions; oversee public integrity; audit implementation and other efforts to promote and assess implementation; promote access to information; create dialogue processes; and hold government bodies accountable.

Central policy, integrity and oversight - <i>continued</i>	Government Partnership and EITI focal points; relevant subnational government authorities.	
Conflicts of interest and political influence	Authorities responsible for asset and interest declarations, conflicts of interest, lobbying and revolving-door rules; electoral-management and political-finance oversight bodies; public procurement, concession, licensing and debarment authorities.	Prevent undue influence in environmental decision-making; disclose lobbying and political contributions; manage conflicts of interest; and apply integrity safeguards to contracts, licences, and concessions.
Environment and natural resources	Ministries responsible for environment, climate, biodiversity, land and natural resources; forestry, fisheries, wildlife, mining, water, land, and protected-area authorities; environmental-protection agencies; environmental licensing, permitting, and impact-assessment bodies; authorities managing concessions, quotas, resource rights, and natural-resource contracts.	Identify and manage corruption risks in environmental and climate governance; improve licensing and permitting; publish information; strengthen institutional integrity; and oversee natural-resource use.
Environmental inspection and enforcement	Environmental inspectorates and compliance bodies; wildlife, forestry, fisheries, and mining enforcement services; regional, provincial, and local authorities; coastguard, maritime, and port authorities and customs.	Inspect regulated activities; detect violations and irregularities; enforce licence and permit conditions; impose administrative sanctions; and refer suspected crimes or corruption for investigation.



Criminal investigation and prosecution	Police, including environmental, economic-crime, and organized-crime units; specialized environmental, anti-corruption, financial-crime, and organized-crime prosecutors; customs, border-control, port, and airport authorities; national organized-crime bodies and joint investigative task forces.	Conduct coordinated environmental, corruption, and financial investigations; gather evidence; investigate organized networks; and pursue individual and corporate accountability.
Justice, reporting, and protection	Courts; judicial-training institutions; witness- and whistleblower-protection authorities; internal-affairs and professional-standards units within enforcement agencies.	Adjudicate cases; strengthen judicial expertise; protect people reporting corruption and environmental crime; and investigate corruption within enforcement bodies.
Financial intelligence and investigation	FIUs; police and prosecutorial financial-investigation units; tax and revenue authorities; asset-recovery, asset-management, and non-conviction-based confiscation offices.	Analyse suspicious transactions; conduct parallel financial investigations; trace illicit proceeds; identify tax offences; and freeze, confiscate, manage, and return assets.
Financial-sector oversight and AML/ CFT coordination	Central banks; banking, insurance, securities, and money-services-business supervisors; authorities overseeing anti-money-laundering compliance and suspicious-transaction reporting; and the national AML/ CFT coordination body—often led by the ministry of finance, ministry of justice or interior, central bank, FIU, or a dedicated inter-agency committee.	Coordinate implementation of FATF standards and follow-up to mutual evaluations and their recommendations; ensure financial institutions identify corruption and environmental-crime risks; strengthen customer due diligence and suspicious-transaction reporting; supervise compliance; and support financial investigations.
Companies and beneficial ownership	Company registries; beneficial-ownership registers; corporate regulators; public procurement and licensing authorities; competition authorities; government bodies responsible	Identify the people controlling companies; connect ownership information to licences, concessions, contracts, and political finance; promote corporate compliance; and sanction or



Companies and beneficial ownership - continued	for business integrity and compliance.	exclude companies involved in environmental crime and corruption.
Professional enablers	Governments, supervisory and professional bodies for lawyers, accountants, auditors, notaries, real-estate agents, and company-service providers; bar associations and accountancy or audit-oversight bodies where they perform regulatory functions.	Establish and enforce professional integrity and anti-money-laundering requirements; identify suspicious activity; discipline professionals facilitating corruption or illicit financial flows; and prevent concealment of ownership and proceeds.
Cross-border cooperation	Central authorities for mutual legal assistance and extradition; international-cooperation units in police and prosecution services; customs-cooperation bodies; INTERPOL national central bureaus; FIU-to-FIU cooperation channels; authorities responsible for international asset recovery, tax cooperation, and exchange of information such as beneficial-ownership and other relevant information.	Exchange evidence and intelligence; coordinate investigations; trace suspects, shipments, and assets across borders; obtain mutual legal assistance; and support prosecution, extradition and asset recovery.
Funding and technical assistance	Ministries of finance, planning, and development; national donor-coordination bodies; national climate, biodiversity, forestry, fisheries, and environmental funds; authorities managing international climate and biodiversity finance; institutions coordinating technical assistance from UNODC and other partners.	Allocate resources; integrate anti-corruption safeguards into environmental and climate funding; identify capacity needs; request assistance; and monitor and measure whether technical assistance produces institutional change and publish impact reports.



Looking beyond anti-corruption government actors



Resolution 11/9 is relevant far beyond the anti-corruption authority or agency. Use it to raise standards in other national forums and relevant government bodies — bringing the resolution's commitments into each of the following, plus other forums and bodies that have linkages to corruption linked to CAE:

- financial-sector regulation,
- extractive-sector working groups (e.g. EITI multi-stakeholder groups),
- Open Government Partnership (OGP) action plans,
- climate-finance planning and oversight (including reports to the United Nations Framework Convention on Climate Change - UNFCCC),
- procurement reform,
- and parliamentary committees on the environment, justice, and public accounts



3.1.3 Carrying out advocacy to integrate resolution commitments into national policy and implementation

Once recommendations have been developed, the next step is to advocate for their inclusion and effective implementation in national anti-corruption strategies, environmental and natural-resource legislation, procurement reform, and other related initiatives, programs, and measures.



Develop and implement a plan of action — a template to start from

1

Make the case for why action is needed

Before advocating for specific anti-corruption measures, identify which issues are most likely to gain traction in the relevant national or local context through research and stakeholder engagement.

For example, anti-corruption action on this issue can be framed as a way to address the wide range of impacts resulting from environmental crime and corruption, including:

- **harming economic growth and development,**
- **loss of revenues,**
- **eroding public trust,**
- **security and stability,**
- **and having devastating effects on ecosystems and the climate** ([see Chapter 1.3](#)).

There are devastating impacts on the environment, local communities' livelihoods, and the erosion of public trust, security, and stability. Another important focus is on protecting public revenue and development, since the environmental-crime economy is estimated at up to [USD 281 billion a year](#), making it the third largest criminal sector globally.

Documenting these impacts, their costs, and the solutions - including at the local level - helps [build support](#) for strong action, political will, and the funding needed.

3



2

Develop proposals and materials for engagement with governments

Where capacity allows, move from the “what” to the “how”. Governments frequently accept well-drafted, ready-to-use proposals that under-resourced ministries may not have time to develop themselves. These could include:

- **model provisions,**
- **disclosure templates,**
- **risk-assessment methodologies,**
- **a corruption-risk-management process for a specific agency.**



Build institutional memory

Governments and relevant focal points change; civil society’s continuity is an asset. Keep records, baselines, and relationships alive across electoral and CoSP cycles, rather than for a single moment.

3

Mobilize other key national-level actors to actively support implementation of the resolution commitments and carry out public awareness campaigns

Engaging other key actors in the country can help support and promote implementation of the resolution, such as joining advocacy efforts, contributing to implementation and training, and raising awareness in a sustained way to encourage reporting of corruption and keeping the issue on the national agenda. Other actors can include **the media, community organizations, Indigenous Peoples, youth groups, private sector associations, government donors in the country, academics, and trainers**. Creating coalitions that bring together different actors to carry out joint advocacy and messaging can be stronger than only coming from one.



Champion protection for those who expose wrongdoing

The Resolution’s reporting-person commitments ([OP 6](#)) will not have impact without protection against retaliation. Press for whistleblower and defender-protection frameworks, safe and anonymous reporting channels, and support of community monitors, rangers, journalists, local communities, Indigenous Peoples, and environmental defenders who face retaliation.

Strengthening the agencies that carry the mandate

After mapping out the government agencies involved and their roles and responsibilities on this issue, engage and advocate for these government agencies to put the resolution's commitments into action. Prevention and enforcement depend on bodies that are often under-resourced and politically exposed, including anti-corruption commissions, FIUs, environmental regulators, and specialized prosecutors. Civil society can strengthen them by providing evidence and analysis, advocating for their independence and adequate resourcing, and publicly recognizing good performance.

Provide capacity and technical expertise

- **Provide technical and policy expertise**

Offer evidence-based input and training on issues such as beneficial ownership, public procurement and licensing integrity, financial supervision, traceability technology, and enforcement tools such as special investigative techniques. This can shape policies and implementation measures and, in some contexts, help under-resourced agencies take action they could not otherwise. Contributing that expertise builds better policy and lasting relationships with government stakeholders.

- **Connect national groups with legal support**

Collaborate with pro bono law firms and legal experts, including through the Coalition's networks, which can provide legal assessments, model laws, and drafting input that give national advocacy technical weight it could not otherwise afford.

- **Partner with UNODC field offices and regional hubs and other UN bodies**

Engage UNODC as national-level implementers, trainers and sources of local knowledge on technical assistance ([OP 17](#)), and press for civil society to be involved in the design, delivery and evaluation of that assistance, as well as a beneficiary, when appropriate.





Monitor, document, and report on implementation

- **Build and maintain a national baseline assessment**

Using this chapter's structure as a ready-made framework, assess implementation of relevant OPs—in law and in practice. Maintained and updated over time, this can help develop submissions and advocacy asks, and monitor progress.

- **Produce parallel or shadow monitoring reports**

Publish independent assessments of national implementation of Resolution 11/9 and share them through the Coalition, with UNODC, and other dissemination channels.

- **Use the UNCAC country review to raise environmental crime and corruption issues**

The Convention's own Implementation Review Mechanism (IRM) is a distinct and powerful form of leverage—a recurring examination of how each country implements the UNCAC. The second phase of the IRM, beginning in 2027, opens more room than ever for civil society to bring environmental crime and corruption, and Resolution 11/9, into that examination.

- **Track what your government reports and what is missing or could be improved**

Implementation reporting depends heavily on what governments choose to submit; silence is itself a finding. Track submissions to UNODC surveys and Secretariat reports, and publish shadow assessments that fill the gaps with documented evidence from the ground.

- **Connect the data across borders**

Where resources allow, contribute national findings to comparative mapping of how countries are implementing the resolution—including through the ECC WG. Comparative evidence—who is doing what, and what works—is more persuasive to governments than any single national report, and it accumulates in value with each cycle.





Civil society organisation advocacy to put Resolution 11/9 into practice

CSOs are already putting Resolution 11/9 into practice, identifying priority actions that align both with the resolution's commitments and with their own mandates. Several examples illustrate this in action:

Indigenous rights advocacy in Latin America

[A letter](#) led by Indigenous organizations and authorities from the Amazon and other territories across Latin America, alongside civil society allies, was directed to UN Member States, UNODC, the United Nations Permanent Forum on Indigenous Issues (UNPFII), and the Office of the United Nations High Commissioner for Human Rights (OHCHR). It raises concerns over **the expansion of organized crime and illicit economies, in particular CAE, militarized state responses, and impacts of these dynamics on Indigenous Peoples, territories, and governance structures**. It calls on UNCAC States Parties to fully implement Resolution 11/9, ensuring Indigenous peoples' effective participation in preventing and fighting corruption linked to environmental crimes, and to integrate Indigenous perspectives into anti-corruption strategies and policies.

This shows Resolution 11/9 being invoked directly by Indigenous organizations to link anti-corruption commitments with Indigenous rights.

Natural Resource Governance Institute (NRGI)

NRGI submitted [recommendations to the G7 Presidency](#) on anti-corruption measures for G7 standards-based markets for critical minerals. It explicitly references standards set out in Resolution 11/9 for States parties to strengthen integrity frameworks and preventive anti-corruption tools in environmental institutions — including **codes of conduct, conflict-of-interest standards, corruption risk management, and greater transparency in procurement, human resources, and the awarding of concessions, permits, and licences**.

The Resource Justice Network (RJN)

RJN, together with the ECC WG, convened **a webinar in July 2026 bringing together 168 participants from civil society, government officials, and partner organisations across 58 countries**.

The webinar focused on **how to translate Resolution 11/9's commitments, particularly procurement integrity, beneficial ownership transparency, and public access to information into concrete national action to counter corruption in natural resources and energy transition governance**. Building on country case studies and initiating breakout discussions, participants identified priority areas for further collaboration. They agreed on practical actions to advance them using the UNCAC, EITI, and other relevant initiatives as levers. The session also launched RJN's intention to establish an interregional community of practice, with focal points to sustain exchange and follow-up collaboration beyond the webinar. **This illustrates Resolution 11/9 being used as an organizing framework to move a global CSO network from shared diagnosis to coordinated, actionable follow-up.**



3.2 Feed into the resolution's follow-up process in UNCAC fora to reflect national experiences

Resolution 11/9 builds in specific follow-up actions, as outlined in operative paragraphs 16–19.

These create immediate, near-term opportunities for civil society engagement. They are immediate entry points for CSOs to advocate for their governments to actively report on Resolution 11/9 implementation at CoSP12 and beyond through sustained advocacy.

([Chapter 3.3](#) sets out how these same mechanisms are used through the global, Vienna-based process.)

3.2.1 Call to action: Resolution implementation follow-up measures that civil society can do next

The UNODC implementation survey **OP 16**

A voluntary reporting exercise, in the form of a questionnaire, is expected to be circulated by UNODC to States Parties in the first half of 2027. This will gather good practices, challenges and lessons learned.

- This is the nearest concrete follow-up moment:

Encourage your government to participate substantively and offer civil society input before it finalizes its response. This can be provided through documented national good practices and gaps in response to the survey. If the government remains silent or does not engage civil society in this process, publish independently a shadow assessment.

The Working Group on Prevention's 18th session agenda item on ECC in May 2027 **OP 16**

The resolution directs the Working Group on Prevention to discuss good practices, lessons learned, and challenges on this issue at its 18th session (May 2027). Advocate for your government to actively participate in this Working Group and to include CSOs as part of its preparatory process.

Other civil society engagement during this process includes:

- organizations accredited to the last CoSP (CoSP11) can prepare their own submission or contribute



through the Coalition’s ECC WG;

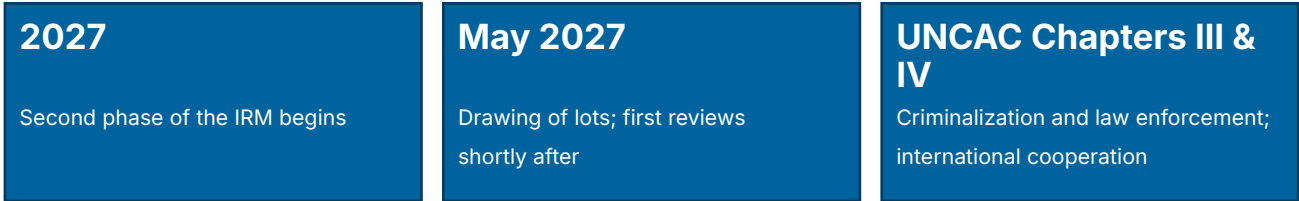
- advocate for a civil society representative to join a government delegation to the Working Group meeting or for a civil society expert to join the panel discussion (by invitation of a State party or UNODC);
- and co-organize a parallel event on the margins of the official meeting to raise attention to civil society’s positions.

Donor funding for implementation **OP 19**

The resolution invites donors to fund implementation. Advocate with your own government (as a potential donor or recipient) and with funders to resource related technical assistance, development of research and guidance tools, and allocate resources for implementation and monitoring on the national level. Where your country is receiving technical assistance under the resolution, press for transparency on what that assistance covers, who is delivering it, and how it aligns with national priorities and civil society’s own recommendations.

3.2.2 Using UNCAC country reviews to combat environmental crime and corruption: the second phase of the Implementation Review Mechanism (IRM)

The IRM is the process through which every State Party’s implementation of the UNCAC is peer-reviewed to identify gaps and good practices in their anti-corruption frameworks. The second phase starts in 2027 and will provide several entry points for discussing the implementation of Resolution 11/9.



Why does this matter for crimes that affect the environment?

The second phase of the IRM will not only assess whether laws exist on paper, but it will also have a central focus on **“implementation in practice”** and **“results achieved”**, addressing new developments and difficulties in UNCAC implementation, as well as a more precise identification of technical assistance needs by the country under review. Implementation gaps are a major impediment to tackling environmental crime and corruption.



The next phase of country reviews will **also lower the barrier for civil society contributions compared with the first phase:**

- by providing (among other improvements) pre-published and updated review timelines so organizations can prepare,
- for reviewing States to consider other sources of information including civil society contributions,
- and for those contributions to be reflected in an annex to the country review report.

A structured, public progress-reporting process follows each review. All these modalities, including the level of civil society's participation are voluntary rather than guaranteed, but are encouraged. Advocacy that makes use of these new openings is part of the task.



How civil society can raise corruption linked to CAE issues and Resolution 11/9 through the country review

1 Encourage your government to address ECC and Resolution 11/9 in its self-assessment

Document the measures it has taken to apply the UNCAC to corruption linked to environmental crime, and to implement Resolutions 11/9 and 11/3, as concrete evidence for the self-assessment's questions on implementation in practice, good practices, new developments and difficulties.

2 Submit civil society information to the review

Provide documented evidence on ECC-related gaps, good practices and case examples — for the country under review to consider when filling the Self-Assessment Checklist (SACL), and for reviewing States in their desk review. Advocate for your input to be reflected in the report findings and, as encouraged in Resolution 11/2, documented in the report's annex.

3 Seek meaningful participation in the country visit

A country visit is the most common form of the direct dialogue stage — an in-person series of meetings on site between reviewing States Parties and officials of the country under review. Holding a meeting dedicated to the views of civil society is a common good practice. Advocate to be included and to raise environmental crime and corruption directly with the reviewing experts.

4 Push for transparency

Encourage your government to publish its self-assessment and full country review report, and to sign the [Coalition's Transparency Pledge](#), so findings on ECC can be scrutinised and acted upon.



5 Advocate on technical assistance

Press for ECC-related issues to appear in the country's identification of technical assistance needs, and for civil society to be included in technical assistance delivery — both as providers and as beneficiaries.

6 Use the results

Turn relevant review findings and recommendations on ECC into a national follow-up agenda, and feed persistent gaps into the resolution's own follow-up process (Chapter 3.2.1) and the next review cycle.

Use these entry points with the upcoming follow-up measures to Resolution 11/9, as indicated above. See the Coalition's [Guide to Transparency and Participation in the UNCAC Implementation Review Mechanism](#) for further details on these entry points.

Which provisions of Chapters III and IV connect to corruption and CAE?

Country reviews of Chapters III and IV of the UNCAC present an opportunity for civil society to raise corruption linked to CAE. Civil society should therefore connect its evidence and policy recommendations related to corruption and CAE to the specific UNCAC provisions under review, using Resolution 11/9 as an additional policy commitment.

Relevant provisions in Chapters III and IV include:

- those addressing bribery
- trading in influence, and abuse of functions
- money-laundering
- Freezing, seizure and confiscation
- liability of companies and other legal persons
- protection of witnesses and reporting persons
- specialized anti-corruption bodies and law-enforcement bodies and cooperation between national authorities
- mutual legal assistance, law-enforcement cooperation, joint investigations, and special investigative techniques
- compensation for victims of corruption



Key issues to examine include:



Detecting, investigating, and holding perpetrators and enablers to account

Are authorities effectively detecting and investigating corruption linked to CAE, including through special investigative techniques, and taking action through prosecution, conviction and appropriate sanctions?

Do these efforts reach the organisers, corrupt officials and other higher-level actors who enable or profit from CAE — as well as companies, beneficial owners, financiers, brokers and professional enablers?

What evidence is there that enforcement targets these actors rather than disproportionately focusing on low-level offenders?



Following the money and recovering assets

Are CAE predicate offences for money-laundering under all relevant environmental, wildlife, forestry, fisheries, mining and waste laws?

Are parallel financial investigations routinely conducted, and are proceeds frozen, confiscated and, where appropriate, used for environmental restoration and victims' reparation?

Is disaggregated information on investigations, prosecutions, convictions, sanctions, collected and publicly available?

Are statistics and other information on asset recovery and return publicly available — assets frozen, confiscated and returned, relevant case methodologies and return agreements — and published at least annually? See the [recommendations of the Coalition's Asset Recovery Working Group](#).



Domestic and international cooperation

Do environmental, anti-corruption, police, customs, prosecution, tax and financial-intelligence authorities cooperate in actual cases, domestically and internationally?

Have mutual legal assistance, information-sharing and joint investigations been used — and with what outcomes and timeframes?

What are the barriers to timely cooperation domestically and internationally, and how can these be overcome?





Protection, evidence and civic space

Are witnesses, reporting persons, journalists, community monitors and environmental defenders able to report corruption and CAE safely?

Are retaliation, intimidation and obstruction investigated and sanctioned? Are mechanisms for witness and reporting-person protection actually available and used in CAE cases?

Are existing UNCAC and CoSP commitments on transparent and accountable asset recovery implemented, including Resolutions 6/3, 8/9 and 9/2?



Follow-up and technical assistance

What has changed since the previous UNCAC review, including in response to previous recommendations?

What evidence demonstrates increased detection, investigation, prosecution, conviction, sanctions or asset recovery in corruption-linked CAE cases?

What implementation gaps remain?

Is information regularly published on technical assistance projects, their aims, partners involved and impacts?

Using these provisions and key issues to focus on, civil society can document cases, enforcement patterns, and practical barriers; request disaggregated data; and provide their analysis on whether previous review recommendations have led to measurable change. Evidence should examine whether enforcement results in accountability for corrupt officials, companies, financiers, brokers, and professional enablers – not only low-level offenders – and whether affected communities, Indigenous Peoples, environmental defenders, and civil society can report wrongdoing and participate in anti-corruption work without retaliation.

Review recommendations and technical-assistance needs should expressly address environmental crime and corruption, with civil society included in developing, delivering, and monitoring follow-up measures.



Addressing crime convergence across review mechanisms

CAE often converges with [drug trafficking](#), [trafficking in persons](#), [migrant smuggling](#), [organized crime](#), [money laundering](#) and other crimes — with corruption enabling the same networks and supply chains.

Civil society can bring relevant evidence not only into UNCAC country reviews, but also into other related review mechanisms and fora:

FATF national risk assessments, mutual evaluations and follow-up processes	UNTOC review mechanism*
Universal Periodic Review of the Human Rights Council	Regional mechanisms — Group of States Against Corruption (GRECO) and the Follow-Up Mechanism for the Implementation of the Inter-American Convention against Corruption (MESICIC)

All of these mechanisms are complementary and can reinforce one another. UNCAC can examine corruption linked to these crimes and promote international cooperation to address them; FATF processes can assess predicate-offence coverage, financial investigations, beneficial ownership, asset recovery, and domestic and international cooperation.

* The effectiveness of the UNTOC review mechanism has been [undermined](#) by persistent delays in implementation, raising concerns about its ability to fulfil its intended objectives. Civil society should advocate for strengthening the review mechanism, and also produce civil society assessments of countries' implementation of UNTOC, including examining application of the UNTOC to combat organized crime linked to environmental crime and corruption.



3.3 Amplifying civil society voices at the global level: coordinating through the ECC WG

CSOs have a crucial role to play in implementing Resolution 11/9 and much of the guidance outlined above can be carried out by a single organization. However, a unified civil society voice multiplies the impact of what any one organization can achieve. Chaired by the Wildlife Justice Commission and comprising nearly 280 individuals worldwide, the ECC WG brings together CSOs, academics, activists and other stakeholders like development agencies and UN officials from around the world to connect on issues and to elevate civil society voices in UNCAC and other global forums, with the credibility of a large and diverse global network.

The ECC WG amplifies individual efforts and advocates collectively for effective implementation of Resolution 11/9 and other global standards, including by:

- **Organizing side events at UNCAC and related forums, and convening governments around good practices:**

On the margins of the Working Group on Prevention, the Working Group on Asset Recovery, the Implementation Review Group, and International Cooperation Expert Meetings and at related processes such as UNTOC, Commission on Crime Prevention and Criminal Justice (CCPCJ), Basel Convention, CITES, Convention on Biological Diversity (CBD), International Union for Conservation of Nature (IUCN), Human Rights Council (HRC), and the United Nations Framework Convention on Climate Change (UNFCCC)—side events and joint webinars keep momentum between formal follow-up moments and connect the resolution to adjacent agendas. In particular, events with tabling and co-sponsoring States (starting with Brazil and Namibia) raise awareness and spotlight early national reforms—an approach that also lets those States receive positive recognition, which encourages others to follow.

- **Aggregating submissions to UNCAC and related forums:**

Contributing to independent submissions and open letters to UNCAC bodies including the IRG, and other related forums across the Coalition's global network so national experiences are aggregated into a collective picture rather than scattered and easily overlooked.

- **Producing a civil society formal CoSP submission ahead of each Conference:**

A consolidated report on progress, gaps, and recommendations to keep the issue on the CoSP agenda.



- **Coordinating joint research and aggregating comparative evidence:**

The ECC WG supports and coordinates research efforts on CAE issues and policy solutions, promoting the sharing of experiences among national and international CSOs and connecting CSOs with States and other stakeholders.

See examples of the ECC Working Group's work:



[Compendium of Gaps, Challenges and Best Practices to tackle Corruption linked to CAE](#)



[Climate and the Breaking the Silos: Combating Environmental Crime and Corruption to Achieve Climate Protection Goals](#)

Individual organizations' national findings are more powerful when brought together in this way — for example through the ECC WG's members page — allowing mapping by different organizations to be compared and consolidated into a fuller regional or global picture that strengthens the overall evidence base for advocacy.

- **Carrying regulatory standards into other global and regional forums:**

Raising Resolution 11/9 in organized-crime, anti-corruption, environmental, climate, and human rights processes so it is not confined to the UNCAC track, reinforcing coordination and closing the gaps that any single forum leaves open.



A standing platform, not a one-off opportunity

Environmental crime and corruption remains a recurring theme across UNCAC Working Groups — spanning prevention, asset recovery, international cooperation and organized crime — so the ECC WG will continue to offer civil society a standing platform to press and support governments on implementation over time.

Get involved with the Working Group



Environmental Crime and Corruption
Working Group

Global Civil Society
Coalition for the UNCAC

To get involved: Contact the ECC WG at ecc@uncaccoalition.org to consult the consult [the compendium of gaps and good practices](#), or to provide updates on national efforts.

Organizations engaging with Resolution 11/9 primarily at the national level are **strongly encouraged to join the [ECC WG](#) (and an equivalent regional or national Coalition network)**, to report back on national efforts to tackle environmental crime and corruption, including promoting and monitoring implementation of this resolution, share experiences and be a part of joint advocacy efforts.

4



Resource compendium

- **4.1 Civil society and non-governmental sources**
- **4.2 International organizations and multi-stakeholder initiatives**
- **4.3 Governments and inter-governmental initiatives**

4. Resources, tools, and other materials

Below is a list of reports, policy briefs, tools, and other resources to draw upon in efforts to promote implementation of Resolution 11/9 at the national, regional, and global levels, including more information on environmental crime and corruption, corruption as a driver of other environmental harms and climate change, policy analysis, case studies, good-practice examples, and challenges and gaps. The list includes resources already referenced and hyperlinked throughout this report, as well as additional resources that may be useful for further reading.

4.1 Civil society and non-governmental sources

UNCAC Coalition and Environmental Crime and Corruption Working Group (ECC WG) publications

Global Civil Society Coalition for the UNCAC. *Access to information as an anti-corruption tool: why UNCAC implementation needs renewed guidance and civil society expertise*. June 11, 2026.

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4.2 International organizations and multi-stakeholder initiatives

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Annex I.

Key corruption-related terms ¹

Term	What it means
Access to information	The public's right and practical ability to request and obtain information held by public authorities. It includes the proactive publication of information and procedures through which individuals may request and receive information.
Asset recovery	The process by which the proceeds of corruption are identified, traced, frozen, confiscated, and ultimately returned to the country from which they were taken or to their rightful owners.
Beneficial owner or beneficial ownership	The natural person or persons who ultimately own or control a company, trust, or other legal arrangement, or on whose behalf a transaction is conducted.
Confiscation	The permanent deprivation of property connected to an offence, usually following an order by a court or another competent authority.
Conflict of interest	A situation in which a person's private interests could improperly influence, or appear to influence, the performance of their official or professional duties.
Controlled delivery	An investigative technique in which authorities allow a suspicious or illicit shipment, transaction, or consignment to continue under their supervision in order to identify the people involved and gather evidence.
Cooling-off period	A period during which a former public official is restricted from taking private-sector roles or representing private interests in areas connected to their former official responsibilities.
Corruption risk assessment and management	A systematic and ongoing process for identifying where and how corruption may occur within an institution or activity, assessing the likelihood and seriousness of those risks, and adopting and monitoring measures to prevent and reduce them.
Debarment	The temporary or permanent exclusion of a person or company from public procurement, public contracts, licences, or other government benefits because of misconduct or failure to meet applicable requirements.
Due diligence	The process through which enterprises can identify, prevent, mitigate, and account for how they address their actual and potential adverse impacts. In the financial sector, this includes verifying customers and beneficial owners and

¹ These definitions are not exhaustive, and terms may be understood or defined differently depending on the national context.

	understanding the purpose and risks of transactions or business relationships.
Enablers, gatekeepers, or service providers	Professionals and businesses whose services may be misused to facilitate corruption, conceal ownership, or move illicit funds. Depending on the applicable law, these may include lawyers, accountants, notaries, trust and company service providers, real-estate professionals, and dealers in precious metals and stones.
Environmental, Social and Governance (ESG)	A framework or criteria to measure the sustainability and ethical impact of an investment or a company focusing on three fields: Environmental, Social and Corporate Governance. While the term ESG is often used in the context of investing, stakeholders also include customers, suppliers, and employees.
Extrabudgetary resources	Voluntary funding provided by Member States or other donors outside the regular United Nations budget, generally to support specified programmes or activities.
Financial intelligence unit	A national authority that receives, analyses, and disseminates financial information, including reports of suspicious transactions, to support the detection and investigation of money-laundering, corruption, and other offences.
Freezing or seizure	The temporary prohibition of the transfer, conversion, disposition, or movement of property, or the temporary assumption of custody or control of property, pursuant to an order issued by a court or other competent authority.
Illicit financial flows	Movements of money or other assets that are illegal in their origin, transfer, or use, that reflect an exchange of value and that cross country borders. The term may include flows associated with corruption, organized crime, money-laundering, and other unlawful activity.
Instrumentalities of crime	Property used, or intended to be used, to commit an offence, such as vehicles, vessels, equipment, accounts, or corporate structures.
Joint investigation or joint investigation team	An investigation conducted collaboratively by authorities from two or more jurisdictions. A joint investigation team may be formally established for a particular case and allow participating authorities to share information and coordinate investigative measures directly.
Legal person and natural person	A natural person is an individual human being. A legal person is an entity recognized by law as having rights and responsibilities, such as a company, partnership, or association.
Money-laundering	The conversion, transfer, concealment, or disguise of property derived from criminal activity for the purpose of hiding its illicit origin or assisting a person involved in the offence to evade legal consequences.

Mutual legal assistance	A formal process through which States assist one another in investigations and legal proceedings, including by obtaining evidence, serving documents, tracing or freezing assets, and enforcing confiscation orders.
Non-conviction-based confiscation or recovery	A legal process through which property connected to crime may be confiscated or recovered without first obtaining a criminal conviction, subject to domestic law, due-process requirements, and other safeguards.
Parallel financial investigation	A financial investigation carried out alongside an investigation into corruption, environmental crime, or another underlying offence, in order to identify money flows, assets, beneficiaries, and possible money-laundering.
Politically exposed person	A person who is or has been entrusted with a prominent public function, as well as certain family members and close associates, and who may therefore present heightened corruption or money-laundering risks requiring additional scrutiny.
Predicate offence	An underlying offence as a result of which proceeds have been generated that may become the subject of a money-laundering offence.
Proceeds of crime	Any property or economic benefit derived or obtained, directly or indirectly, from the commission of an offence.
Reporting person and whistleblower	Someone who reports any facts concerning offences to the competent authorities. A whistleblower commonly refers to a person who reports information about wrongdoing acquired in a work-related context. "Reporting person" may therefore cover a wider group.
Safe haven	A country, jurisdiction, or arrangement in which offenders, proceeds of crime, or other assets can avoid detection, investigation, freezing, confiscation, return, or other forms of accountability.
Shadow or parallel report	An independent assessment prepared by civil society or other non-governmental actors to complement, scrutinize, or challenge information submitted by a government to an international body.
Special investigative techniques	Investigative methods used to uncover complex or concealed criminal activity, such as controlled deliveries, undercover operations, interception of communications, and electronic or physical surveillance. Their use must comply with domestic law and applicable safeguards.
Subsidiary bodies of the CoSP	Intergovernmental working groups established by the CoSP to examine particular aspects of UNCAC implementation and provide guidance and recommendations to the Conference. These include the Implementation Review Group and the working groups on prevention and asset recovery, and the intergovernmental expert meeting on international cooperation.

Suspicious transaction report	A report submitted by a financial institution such as a bank, or by a professional to a financial intelligence unit when there is reason to suspect a transaction or activity may be connected to money-laundering, corruption, or other illegal activity.
Technical assistance	Legislative, policy, institutional, investigative, technological, training, or other specialist support provided to help a requesting country or institution to prevent and combat corruption and implement the UNCAC and related commitments.
Traceability and authentication	Traceability is the ability to follow a product, commodity, document, or transaction through its origin and subsequent stages. Authentication is the process of verifying that an item, record, permit, transaction, or identity is genuine.

Annex II. Full text of Resolution 11/9

Resolution 11/9:

<https://www.unodc.org/corruption/en/cosp/conference/session11-resolutions.html#Res.11-9>

Preventing and combating corruption as it relates to crimes that affect the environment

The Conference of the States Parties to the United Nations Convention against Corruption,

Recognizing that preventing and combating corruption in all its forms is a priority, and reiterating its concerns regarding the seriousness of the problems and threats posed by corruption,

Recognizing also that anti-corruption and integrity measures contribute to preventing and combating crimes that affect the environment and thus to conserving and protecting the environment,

Taking note of the progress in research on corruption as it relates to crimes that affect the environment, including the United Nations Office on Drugs and Crime report entitled *Preventing and Combating Corruption as it Relates to Crimes that Have an Impact on the Environment: An Overview*,

Recognizing that corruption as it relates to crimes that affect the environment diminishes the effectiveness of public policies and public procurement, including in fighting against organized crime,

Recognizing also that an increasing number of international, regional and national instruments and initiatives are addressing corruption as it relates to crimes that affect the environment,

Recalling resolution 8/12 of the Conference of the States Parties to the United Nations Convention against Corruption, adopted on 20 December 2019 and entitled “Preventing and combating corruption as it relates to crimes that have an impact on the environment”, Conference resolution 10/5 of 15 December 2023, entitled “Measures to address corruption involving organized criminal groups”, the political declaration adopted by the General Assembly at its special session against corruption in June 2021, entitled “Our common commitment to effectively addressing challenges and implementing measures to prevent and combat corruption and strengthen international cooperation”,^[1] Assembly resolution [76/185](#) of 16 December 2021, entitled “Preventing and combating crimes that affect the environment”, Economic and Social Council resolution [2025/17](#) of 29 July 2025, entitled “Tackling illicit trafficking in wild fauna and flora, including timber and timber products, the illegal mining of and illicit trafficking in minerals and precious metals, illicit trafficking in waste and other crimes that affect the environment”, resolution 10/6 of 16 October 2020 and resolution 12/4 of 18 October 2024 adopted by the Conference of the Parties to the United Nations Convention against Transnational Organized Crime and entitled, respectively, “Preventing and combating crimes that affect the environment falling within the scope of the United Nations Convention against Transnational Organized Crime” and “Enhancing measures to prevent and combat crimes that affect the environment falling within the scope of the United Nations Convention against Transnational Organized Crime”, resolution 17.6 of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora, entitled “Prohibiting, preventing, detecting and countering corruption which facilitates activities conducted in violation of the Convention”, and the Kyoto Declaration,^[2] as the outcome document of the Fourteenth United Nations Congress on Crime Prevention and Criminal Justice,

Taking note of the report by the Secretariat entitled “Challenges and good practices in addressing corruption involving organized criminal groups”,^[3]

Recognizing that the United Nations Convention against Corruption^[4] constitutes an effective tool and a central part of the legal framework for preventing and combating corruption as it relates to crimes that affect the environment, and for strengthening international cooperation in that regard,

Highlighting, in that regard, the contributions of intergovernmental organizations and the important role of the media, civil society and reporting persons in the prevention of and the fight against corruption as it relates to crimes that affect the environment,

Recognizing the vital role of Indigenous Peoples and of local communities in the conservation and sustainable use of the environment, and noting with concern that corruption related to crimes that affect the environment can undermine their livelihoods,

Noting with appreciation the increasing efforts within the private sector to promote integrity, transparency and accountability, including through the adoption and strengthening of comprehensive anti-corruption measures and good practices, also as they may relate to crimes that affect the environment,

Reaffirming its mandate to cooperate with relevant international and regional organizations and mechanisms and non-governmental organizations to achieve the objectives of the Convention, in line with article 63 of the Convention,

Reaffirming also that every State has, and shall freely exercise, full and permanent sovereignty over all its natural resources,

1. *Urges* States Parties, in accordance with the United Nations Convention against Corruption and the fundamental principles of their domestic law, to address corruption as it relates to crimes that affect the environment by developing, strengthening and effectively implementing anti-corruption frameworks and policies that reflect the principles of the rule of law, proper management of public affairs and public property, integrity, transparency, and accountability;

2. *Calls upon* States Parties, in accordance with their domestic law, to strengthen integrity frameworks and the use of preventive anti-corruption tools in the public sector, particularly in institutions involved in environmental conservation and protection, including, where appropriate, by developing codes of conduct, implementing conflict-of-interest standards, undertaking corruption risk management processes and promoting integrity, transparency and accountability in public procurement, human resources management and the awarding of concessions, permits and licences;

3. *Encourages* States Parties, where appropriate and in accordance with their domestic law, to develop or strengthen robust frameworks to address corruption as it relates to crimes that affect the environment, in particular, frameworks for open government, transparency and effective public access to relevant information with a view to enhancing public oversight and public awareness;

4. *Also encourages* States Parties, in accordance with their domestic law and within their means, to work in cooperation with each other, as well as with relevant organizations and stakeholders, such as the United Nations Office on Drugs and Crime and the International Criminal Police Organization (INTERPOL), to identify and promote, on a voluntary basis, the use of technologies to prevent, investigate and combat corruption as it relates to crimes that affect the environment, in particular, technologies for identification, traceability, due diligence and authentication, in order to support criminal investigation and prosecutions;

5. *Strongly encourages* States Parties to take appropriate measures, in accordance with their domestic law and relevant international obligations, to strengthen cross-border cooperation and enforcement controls, including, where appropriate and on a voluntary basis, through the

timely sharing of information among law enforcement agencies, including through regional organizations and, where appropriate, with INTERPOL;

6. *Encourages* States Parties, in accordance with their domestic law, to establish and strengthen confidential complaint systems and protected internal reporting systems that are accessible, diversified, reliable and inclusive in order to facilitate timely reporting of corruption as it relates to crimes that affect the environment and to ensure the confidentiality of reporting persons' identities and personal information, including, where appropriate, allowing for anonymous reporting;

7. *Calls upon* States Parties to take appropriate measures, within their means and in accordance with the fundamental principles of their domestic laws, to promote the active participation of individuals and groups outside the public sector, such as civil society, non-governmental organizations and community-based organizations, in the prevention of and fight against corruption, and to raise public awareness regarding the existence and causes of, the gravity of and the threat posed by corruption as it relates to crimes that affect the environment;

8. *Further encourages* States Parties, where appropriate and in accordance with their domestic law, to promote integrity and transparency in relations between the private and public sectors, including, where applicable, through preventing and managing conflicts of interest, preventing undue advantage and promoting and supporting the adoption of comprehensive integrity and compliance programmes in the private sector that effectively prevent corruption as it relates to crimes that affect the environment;

9. *Urges* States Parties to promote accountability, integrity and transparency by taking the necessary measures, in accordance with the Convention and their domestic law, to hold liable any legal or natural persons subject to their jurisdiction that perpetrate an act of corruption as it relates to crimes that affect the environment;

10. *Urges* States Parties, in accordance with their domestic law, to take the measures necessary to strengthen their capacity to effectively detect, investigate, prosecute and adjudicate corruption as it relates to crimes that affect the environment, in particular as it relates to organized crime, money-laundering and illicit financial flows derived from the proceeds of crime, including by, inter alia, improving coordination and promoting cooperation among relevant competent authorities, by making use of, where appropriate, articles 49 and 50 of the Convention to provide for joint investigations and special investigation techniques and by ensuring that such entities may carry out their functions effectively and free from any undue influence by providing them with the necessary resources;

11. *Encourages* States Parties, in accordance with their domestic law, to take the measures necessary to prevent the transfer abroad of the proceeds of corruption as it relates to crimes that affect the environment by denying safe haven and enhancing mutual cooperation in the identification, tracing, freezing, seizing, confiscation and recovery of proceeds or other property and instrumentalities of crime and their disposal and return, in line with the Convention

and making use, as appropriate, of the various tools available to enhance international cooperation, including through the United Nations Office on Drugs and Crime and other international organizations, such as INTERPOL, including the INTERPOL silver notice system;

12. *Calls upon* States Parties to strengthen cooperation in criminal matters and, where appropriate and consistent with their domestic legal system, to consider assisting each other in investigations of and proceedings in civil and administrative matters relating to corruption as it relates to crimes that affect the environment, in line with chapter IV of the Convention;

13. *Also calls upon* States Parties, in accordance with their domestic law and existing international commitments, to enhance the use and sharing of beneficial ownership information to strengthen efforts to prevent and combat corruption as it relates to crimes that affect the environment and to ensure that such information is available to relevant competent authorities in accordance with the applicable requirements under their domestic law;

14. *Encourages* States Parties to strengthen, within their means and in accordance with the Convention and their domestic law, comprehensive domestic regulatory and supervisory regimes for banks and non-bank financial institutions, including natural or legal persons that provide formal or informal services for the transmission of money or value and, where appropriate, other bodies particularly susceptible to money-laundering, within their competence, in order to assess and address, consistent with domestic law, their potential role in facilitating or enabling offences under the Convention insofar as they relate to crimes that affect the environment;

15. *Urges* States Parties, in accordance with their domestic law and within their competence, to engage, where appropriate, with relevant service providers to promote the establishment and strengthening of effective internal controls and oversight of such controls in order to detect and deter suspicious activity and prevent the potential misuse of their services to facilitate corruption offences and related illicit financial flows derived from crimes that affect the environment;

16. *Directs* the Open-ended Intergovernmental Working Group on the Prevention of Corruption to include, as a topic for discussion at its seventeenth or eighteenth session, good practices, lessons learned and challenges concerning the use of anti-corruption and integrity tools to address corruption as it relates to crimes that affect the environment in order to identify needs and to inform technical assistance, capacity-building and national policy development efforts and support the effective implementation of the Convention;

17. *Takes note of* the work undertaken by the United Nations Office on Drugs and Crime in the development of technical assistance programmes aimed at preventing and combating corruption as it relates to crimes that affect the environment;

18. *Requests* the secretariat of the Conference of the States Parties to report, within existing resources, on the implementation of the present resolution to the Conference at its twelfth session and to its relevant subsidiary bodies;

19. *Invites* Member States and other donors to provide extrabudgetary resources for the purposes set out in the present resolution, acknowledging that such extrabudgetary resources are subject to the rules and procedures of the United Nations, and requests the United Nations Office on Drugs and Crime to utilize any such extrabudgetary resources efficiently and effectively.

[1] General Assembly resolution [S-32/1](#), annex.

[2] General Assembly resolution 76/181, annex.

[3] [CAC/COSP/2025/21](#).

[4] United Nations, *Treaty Series*, vol. 2349, No. 42146.