Reflections and recommendations from Latin American and Caribbean civil society on the UNCAC IRM and its next phase

Global Civil Society Coalition for the UNCAC

Regional Submission to the 2026 CoSP Special Session

6 October 2026

The United Nations Convention against Corruption (UNCAC) Implementation Review Mechanism (IRM) assesses how States Parties implement their commitments and identifies where further action is needed. Civil society participation is essential to ensure reviews reflect implementation in practice, not just legal compliance.

After validation from its Latin America and the Caribbean (LAC) regional community, the Global Civil Society Coalition for the UNCAC (the Coalition) makes this submission to inform discussions at the 2026 Conference of the States Parties (CoSP) Special Session.

1. Civil society participation in UNCAC reviews

According to the Coalition's UNCAC Review Status Tracker, of the region's 32 States Parties, 13 have completed their second cycle review, 17 are ongoing and for 2 no information is publicly available.[1] Fifteen years after the first cycle began, two States have still not completed it, and the status of two more is unknown.[2]

Involvement of "other stakeholders" is recorded for 24 of the 32 2nd cycle reviews. In 10 cases, the Coalition identified the organisations involved.[3] In the other 14, UNODC country profile pages record "other stakeholders" without naming them.[4] One review recorded no stakeholder involvement, and in one further case, it is described as supposed but unverifiable.[5] A review that cannot say who was consulted cannot demonstrate that consultation was broad or independent. In the 1st review cycle, 26 of 28 completed reviews indicate the involvement of "other stakeholders", though five country visits did not involve them.

Where participation is publicly known in 2nd cycle reviews, the experiences show what the mechanism can deliver. Some visits included two to four civil society organizations and private sector representatives; including Chile – a review the Coalition assesses as fully compliant with the Transparency Pledge.[6] Yet across all 32 reviews, only one records civil society

[1] Global Civil Society Coalition for the UNCAC, "UNCAC Review Status Tracker", https://uncaccoalition.org/uncacreviewstatustracker/. Figures as of August 2026.
[2] Ecuador and Panama remain ongoing; the status of Barbados and Saint Kitts and Nevis is unknown.
[3] Argentina, Brazil, Chile, Colombia, Costa Rica, Cuba, the Dominican Republic, Ecuador, Honduras and Paraguay.
[4] Antigua and Barbuda, the Bahamas, Belize, El Salvador, Grenada, Guatemala, Haiti, Mexico, Panama, Peru, Saint Lucia, Trinidad and Tobago, Uruguay and Venezuela.
[5] Mexico, where the tracker notes that other stakeholders were supposedly involved but no information is available.
[6] See: Global Civil Society Coalition for the UNCAC, Transparency Pledge, https://uncaccoalition.org/participate/campaigns/transparency-pledge/.

meeting the peer reviewers without the government under review present, and then for a single hour.[7] In Europe such closed sessions are increasingly the norm; here they are the exception, leaving organizations critical of their government exposed to possible retaliation. Several recommendations from civil society shadow reports were included in the official executive summaries, demonstrating their direct impact.[8]

a. Follow-up to reviews

Follow-up is the weakest stage. No public information exists on measures taken after any of the region's 13 completed second-cycle reviews. Reviews conclude, recommendations are issued, and the public record stops – making the IRM next phase all the more important.

b. Transparency and access to information

In the 2nd cycle, only 7 of the 13 completed LAC reviews (54%) published full country reports.[9] Only two States have published their self-assessment checklists – both Transparency Pledge signatories.[10] Two more were obtained through the Coalition's Access to Information (ATI) campaign.[11] For the 1st review cycle, 15 of the 28 (54%) completed LAC reviews published country reports,[12] and again, only two published their self-assessment checklist.[13] One more was obtained through our ATI campaign.[14] For the remainder, a short executive summary is the entire public record of a multi-year process. Review schedules and focal points are rarely published.

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[7] Ecuador, where Fundación Ciudadanía y Desarrollo and IAN met the peer reviewers without the government under review present during the country visit of 14–16 November 2023.
[8] This was the case for Argentina, where the parallel report was published in August 2021, nearly two years before the June 2023 country visit. Asociación por la Igualdad y la Justicia (ACIJ), the parallel report author, took part in the country visit and seven of Argentina's 24 executive summary recommendations overlap with the parallel report recommendations, with four strong matches. Another example is Brazil, where Transparency Brasil's recommendation on anti-money laundering rules for lawyers, which they raised as a recommendation in the country visit – during the parallel report writing process – and again in their report recommendations, was included in Brazil's executive summary and final country report recommendations. Similarly, Transparencia por Colombia's parallel report was published in January 2022, they participated in the country visit in June 2022 and five of Colombia's 21 executive summary recommendations overlap with the parallel report recommendations, with three strong matches. The same is true for Costa Rica, where after Costa Rica Íntegra's parallel report publication in June 2021, and their participation in the country visit in December 2022, five of the 19 executive summary recommendations overlap strongly with eight of the parallel report's recommendations. Finally, seven of 30 of Ecuador's executive summary recommendations overlap with eight recommendations from Fundación Ciudadanía y Desarrollo's parallel report recommendations, three of them strongly – with the parallel report published in April 2021 and the CSO participating in the country visit in November 2023. There are additional examples that have not been reflected here.
[9] Antigua and Barbuda, Chile, Colombia, Costa Rica, Honduras, Mexico and Peru.
[10] Chile and Argentina. See their Transparency Pledge compliance status here: Global Civil Society Coalition for the UNCAC, Transparency Pledge.
[11] Paraguay and Mexico, see: Global Civil Society Coalition for the UNCAC, Access to Information Campaign, https://uncaccoalition.org/uncac-review/access-to-information-campaign/.
[12] Argentina, Belize, Bolivia, Brazil, Chile, Colombia, Costa Rica, Cuba, El Salvador, Haiti, Honduras, Mexico, Panama, Peru and Uruguay.
[13] Colombia and Brazil, see: UNCAC Review Status Tracker, 1st review cycle.
[14] Mexico, see: UNCAC Review Status Tracker, 1st review cycle.

Six States Parties in the region have signed the Coalition's Transparency Pledge.[15] Chile is assessed as fully compliant, publishing its review schedule, focal point details and the self-assessment checklist,[16] and discussing review findings in the multi-stakeholder Alianza Anticorrupción UNCAC in which civil society participates.[17] This is the clearest demonstration in the region that the Pledge commitments are practicable. The remaining signatories are partially or mostly compliant, and 26 States have not signed.

c. Civil society parallel reports

The region has the strongest parallel reporting record of any: 23 Coalition-supported reports across both cycles, 10 in the first and 14 in the second.[18] These provide independent assessments, examining whether laws and institutions function in practice, not just on paper.

2. First-Cycle review in hindsight: Common challenges and follow-up

From the country report and executive summaries published between 2013 and 2015 for the 28 completed 1st cycle reviews covering UNCAC Chapters III (criminalization and law enforcement) and IV (international cooperation), the main findings[19] closely align with the region's ten independently-produced civil society parallel reports:

a. **Criminalization is broad on paper but defective in scope.** Three defects recur in nearly every review: bribery and embezzlement offences omit the promise or offer, indirect commission, and benefits accruing to third parties or entities. A small set of offences is simply absent – private-sector bribery (art. 21) above all, along with passive bribery of foreign officials (art. 16(2)) and the two limbs of obstruction of justice most relevant to corruption. Most States establish no criminal liability of legal persons and confiscation regimes stop short of value-based confiscation, transformed and intermingled proceeds, and the management of seized assets.
b. **People who report corruption are not protected.** Article 33 is the weakest-implemented provision in the region: most States had no legislation at the time of review or very dispersed legislation, and those with provisions had not brought them into force, confined them territorially, or offered confidentiality without protection from retaliation. Witness protection programmes exist but are underfunded and were designed for drug trafficking and organized crime, rarely reach corruption cases, and no State reviewed had concluded an international relocation agreement. One review recorded plainly that reporting corruption "is not considered a safe practice".

[15] Argentina, Brazil, Chile, Honduras, Mexico and Peru. See: Global Civil Society Coalition for the UNCAC, "Transparency Pledge", https://uncaccoalition.org/uncac-review/transparency-pledge/.
[16] Currently not online – page unavailable.
[17] See https://www.alianzaanticorrupcion.cl/AnticorrupcionUNCAC/preguntas-frecuentes/.
[18] First cycle: Argentina, Brazil, Chile, Colombia, Guatemala, Haiti, Nicaragua, Panama, Peru and Uruguay. Second cycle: Argentina, Brazil, Chile, Colombia, Costa Rica, Ecuador, El Salvador, Guatemala, Honduras, Mexico, Paraguay, Puerto Rico, and Venezuela, with a report on the Dominican Republic in progress. See https://uncaccoalition.org/resources/civil-society-parallel-reports/2nd-cycle/ and https://uncaccoalition.org/resources/civil-society-parallel-reports/1st-cycle/.
[19] Artificial intelligence (Claude) was used to support the analysis of regional trends and challenges, with a systematic review of all publicly available first cycle country reports and executive summaries for Latin American and Caribbean States Parties.

c. **Anti-corruption institutions have mandates without means.** Five anti-corruption prosecutors nationwide and no financial analysts; an integrity commission whose chairperson had never been appointed; an anti-corruption unit that may investigate but not prosecute; a commission still awaiting implementing decrees with no fixed budget. The legal architecture is in place; the capacity to use it is not.
d. **International cooperation is a framework with almost no corruption practice behind it.** Extradition and mutual legal assistance volumes in corruption matters are in the single digits or zero; several States declined the Convention as a legal basis and others never invoked it; central authorities are fragmented, unstaffed or absent altogether; and special investigative techniques remain reserved for drugs and organized crime.

A lack of data makes these issues impossible to monitor properly. Nearly every State was told to build a crime statistics system disaggregated by offence, procedural stage and outcome; in at least one review the effectiveness of the anti-corruption law could not be assessed for want of data. That absence confines the reviews to the law on the books and makes the civil society parallel reports indispensable. It is compounded at the mechanism level: no follow-up stage, almost no reporting back on recommendations,[20] no revisiting of Chapters III and IV in the second cycle, and reports published two to seven years after the country visit.

The region's Follow-Up Mechanism to the Inter-American Convention against Corruption (MESICIC) provides for civil society submissions and on-site visits as a matter of course. States Parties in the region therefore already operate a peer review process with structured stakeholder participation – what we recommend below is neither unprecedented nor administratively burdensome.

3. Recommendations for the IRM next phase

Resolution 11/2[21] and civil society experiences across the region call for a more transparent, inclusive, participatory review process with structured follow-up.

We urge States Parties to adopt review documents for the IRM next phase that reflect its new scope, and to systematically revisit previous cycle's recommendations, covering implementing progress, practical impact, remaining challenges, the impact of technical assistance (TA) received and required.

Furthermore, we urge States Parties to strengthen:[22]

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[20] Follow-up in this region compares favourably with others. Eleven States have reported publicly on measures taken since their first-cycle review concluded, through voluntary statements to the Implementation Review Group in 2016 or submissions to CoSP10 in 2023. (Argentina, Bolivia, Brazil, Colombia, Costa Rica, Cuba, El Salvador, Guatemala, Mexico, Panama and Paraguay. See the voluntary statements and good practice submissions to the Implementation Review Group, November 2016, and submissions to CoSP10, CAC/COSP/2023/8.) However, such reporting remains voluntary, episodic and unconnected to any obligation, and it has not carried into the second cycle, where the figure is zero.

[21] UNODC, "Resolution 11/2", https://www.unodc.org/corruption/en/cosp/conference/session11-resolutions.html#Res.11-2.

[22] **Please also consult our Open Letter on Enhancing anti-corruption efforts globally by adopting a stronger UNCAC implementation review mechanism, which outlines steps States Parties can take in the lead-up of the next IRM phase:** https://uncaccoalition.org/wp-

1. Stakeholder participation, by:

a. **Ensuring early engagement,** including access to review information and opportunities for written and oral input, with adequate prior notice.

b. **Preparing the self-assessment checklist through broad consultations**, and making a dedicated session between peer reviewers and civil society, without the government under review present, a standard element of every country visit, with sufficient time.

c. **Considering information provided by non-governmental stakeholders.**[23]

d. **Developing national follow-up plans to implement recommendations**, and involving stakeholders in designing and delivering TA.

2. Transparency, by:

a. **Proactively publishing key review documents**, including focal point names, review schedule, self-assessment checklist, full country report and executive summary.

b. **Providing regular updates on review progress.**

c. **Publishing which stakeholders were engaged and how**, replacing the undifferentiated category of "other stakeholders".[24]

d. **Annexing stakeholder input to the country review report.**[25]

e. **Publicly communicating review outcomes** through joint UNODC–State Party announcements when summaries and reports are published.

f. **Publishing updates on implementation of review recommendations ahead of CoSP sessions**, building on the region's voluntary reporting practice – identifying, for each recommendation, progress made, pending actions and supporting evidence.

The Coalition and its regional network stand ready to support the Implementation Review Group and States Parties in applying these recommendations.

content/uploads/2026/10/Final---Open-Letter-on-Enhancing-anti-corruption-efforts-globally-by-adopting-a-stronger-UNCAC-implementation-review-mechanism_CoSP-Special-Session_as-of-16-October-2026.pdf.

[23] In line with resolution 11/2, operative paragraph (OP) 12.

[24] In line with resolution 11/2, operative paragraph (OP) 12. This includes: removing legal barriers – such as foreign agent laws – so that organizations can participate. Several Latin American countries have laws targeting NGOs.

[25] In line with resolution 11/2, operative paragraph (OP) 12.