South-West Asia and North Africa reflections on first-phase UNCAC reviews, and recommendations for the IRM next phase

Global Civil Society Coalition for the UNCAC

Regional Submission to the 2026 CoSP Special Session

6 October 2026

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

Following validation by its South-West Asia and Northern Africa (SWANA) 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. It sets out what the public record and civil society experience show about reviews in the region, what the first cycle found, and what the region asks of the IRM's next phase.

1. Civil society participation in UNCAC reviews

According to the Coalition's UNCAC Review Status Tracker, of the 19 States Parties in the region, 8 have completed their second cycle review, 10 reviews are ongoing and for one, no information is publicly available.[1] A country visit or joint meeting has taken place in 17 of the 19 States. Although some of the country visits were scheduled for 2018 or earlier, the respective reviews remain open, reflecting serious delays.[2] As for the first cycle almost all reviews are completed, with one review ongoing and one with unknown status.

The Tracker records "other stakeholders" as involved in 13 of the 16 second-cycle reviews with a country visit or joint meeting with civil society participation confirmed for only 5[3] – against 10 of 17 in the first cycle.[4] The identity and level of independence of most of those stakeholders is not publicly known.

The Coalition has collected UNCAC review experiences from SWANA CSOs across the region. Only one reported substantial involvement – reviewing a draft self-assessment checklist and taking part in the country visit.[5]

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[1] Global Civil Society Coalition for the UNCAC, "UNCAC Review Status Tracker", https://uncaccoalition.org/uncacreviewstatustracker/. All figures in this submission are drawn from the Tracker as of August 2026.

[2] Iran's second-cycle review was scheduled for 2016/17 and is still running a decade later, Kuwait's was scheduled for 2017 and Libya's for 2018.

[3] Civil society participation has been confirmed for Lebanon, Jordan, Bahrain, Kuwait and Morocco.

[4] The Tracker records whether "other stakeholders" were involved, following the wording used in country review reports and on UNODC country profile pages.

[5] This was the case for Jordan. Another two CSOs were also invited to the country visit. They all received around 3-4 weeks notice before the country visit. The meeting itself was only around one hour long and the government under review remained in the room, contrary to best practice. long,https://uncaccoalition.org/resources/review-status-tracker/?country=jordan#data.

Additionally, Coalition members report consistently of a narrowing operating environment – prosecutions and forced closures of CSOs, legislation removing associations' standing to bring corruption cases, crackdowns on activists and journalists – compounded by the withdrawal of donor funding.[6] In those countries, the participation of CSOs in UNCAC reviews under such circumstances cannot be therefore considered as meaningful.

Meaningful participation best practice goes far beyond just inviting an organisation to participate in the country visit, and includes: adequate notice, access to the self-assessment checklist, a broad and independent range of participants, the opportunity for written submissions, and a session with the peer reviewers without the government under review present.

a. Follow-up to reviews

Follow-up is where the review cycles diverge most sharply. For the first cycle, 10 of the 17 completed reviews have some publicly recorded information on measures taken afterwards – a higher proportion than most regions achieve. However, most States Parties provided information on measures taken since the completion of the first cycle reviews on their UNODC country profile pages from one-off reporting at an IRG session in 2016 or CoSP10 in 2023, and some are just general statements and do not refer to the recommendations received.[7] For the second cycle, the Coalition recorded no follow-up information provided by SWANA countries.

b. Transparency and access to information

Transparency is the region's weakest dimension No self-assessment checklist has been published anywhere in this region in either cycle. While 8 of the 17 completed first-cycle country reports have been published,[8] only 3 of the 8 completed second-cycle country reports have been.[9]

The Coalition's Transparency Pledge sets minimum standards: publishing the review schedule and focal point, announcing completion, publishing the self-assessment checklist and full country report, and holding civil society briefings on findings. Of the 46 signatories, four are in this region, with different levels of compliance.[10] Three countries have also committed to

[6] Global Civil Society Coalition for the UNCAC, reports of the SWANA regional meetings, 2025, https://uncaccoalition.org/1st-swana-regional-meeting-in-2025-civil-society-faces-mounting-challenges-amid-global-aid-cuts-and-shifting-anti-corruption-priorities/.
[7] Algeria, Egypt, Iran, Iraq, Kuwait, Morocco, Oman, Qatar, Saudi Arabia and the State of Palestine. Most of this consists of voluntary statements to a single session of the Implementation Review Group in 2016 or of submissions to CoSP10 in 2023;
[8] Morocco, Kuwait, Algeria, State of Palestina, Saudi Arabia, Oman, Libya and Lebanon have published their first-cycle country reports.
[9] State of Palestine, Morocco and Saudi Arabia are the only States Parties that have published their second-cycle country reports.
[10] Morocco is mostly compliant, having published its full country report and involved civil society in the review; Lebanon and Jordan partially compliant with reviews ongoing, Tunisia is not compliant.

the UK-led IRM initiative,[11] including to publishing the full country report,[12] and how civil society can engage in follow-up.

Additionally, SWANA-based CSOs haven't taken part in the Coalition's Access to Information Campaign, as a possible way to obtain the self-assessment checklist,[13] mainly due to the fact that much of the region has no functioning right-to-information frameworks.[14]

c. Civil society parallel reports

Civil Parallel reports on country UNCAC implementation are considered independent published assessments of UNCAC implementation, particularly in SWANA. Eight have been produced across the two cycles, covering 7 of the region's 19 States Parties.[15]

Where reports exist, they have done what the official record often lacks: tested whether laws work in practice, through stakeholder interviews, case documentation and information requests, and opened a conversation with authorities about reform priorities.

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

Fifteen years after the first cycle began, the region's public evidence base for what it found is thin. From the 17 completed first-cycle reviews of UNCAC Chapters III and IV, the available documents show the following common challenges and recommendations:[16]

a. **Criminalizing the bribery of foreign public officials (art. 16):** most reviews called for establishing the active offence, and for considering the passive form.

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[11] Iraq, Lebanon and Morocco. This commitment by around 60 States Parties was presented at CoSP10, and included:
- Publishing timelines for our country review and keeping country focal point details updated
- Publishing the full peer-reviewed IRM country report
- Publishing how civil society and non-state actors can engage in the review and follow up process.

"See: UNODC, "Conference room paper", 8 December 2023, https://www.unodc.org/documents/treaties/UNCAC/COSP/session10/CAC-COSP-2023-CRP.14.pdf.

[12] Morocco has fulfilled its commitment regarding the publication of the full country report, for both cycles.

[13] Global Civil Society Coalition for the UNCAC, "Access to Information Campaign", https://uncaccoalition.org/participate/campaigns/access-to-information-campaign/.

[14] See "MENA: Setbacks and persistent challenges to the right to information", Article 19, September 2025: https://www.article19.org/resources/mena-setbacks-and-persistent-challenges-to-the-right-to-information/

[15] Second-cycle parallel reports were supported by the Coalition for Iraq, Lebanon, Republic of Yemen, and Tunisia. The reports on the State of Palestine (2018 and 2023) and Bahrain (2021) were published independently of the Coalition's parallel reporting programme. See: Global Civil Society Coalition for the UNCAC, "Civil Society Parallel Reports", https://uncaccoalition.org/resources/civil-society-parallel-reports/2nd-cycle/. First-cycle parallel reports were supported by the Coalition and Transparency International for Morocco, and Tunisia. See: https://uncaccoalition.org/resources/civil-society-parallel-reports/1st-cycle/.

[16] Artificial intelligence (Claude) was used to support the analysis of regional trends and challenges, with a systematic review of all publicly available first and second-cycle country reports and executive summaries for SWANA States Parties, as well as from UNODC, "State of Implementation of the United Nations Convention against Corruption: Criminalization, Law Enforcement and International Cooperation", 2017.

b. **Protection of reporting persons (art. 33) and of witnesses, experts and victims (art. 32).** All SWANA States received related-recommendations. Frameworks were rare and largely untested, bearing directly on whether corruption is reported at all.

c. **The non-mandatory UNCAC offences were unevenly implemented:** Nine reviews recommended action on illicit enrichment (art. 20), ten on trading in influence (art. 18), and nine on private-sector bribery and embezzlement (arts. 21 and 22).

d. **Confiscation frameworks stopped short of the Convention:** Twelve reviews carried recommendations under article 31, repeatedly on the absence of any regime for administering frozen, seized and confiscated property.

e. **Chapter IV frameworks were formally in place but operationally incomplete:** thirteen reviews made recommendations on extradition and twelve on mutual legal assistance. The problems were practical – not all Convention offences were extraditable, missing notifications to the Secretary-General, and no framework for transferring criminal proceedings or joint investigations.

f. **Reviewers could rarely establish what this achieved in practice due to gaps in data-collection:** Six reviews recommended systems to collect data on corruption cases and cooperation requests.

3. Recommendations for the IRM next phase

Resolution 11/2[17] and civil society experiences across SWANA highlight the need for a review process that is more transparent, inclusive, participatory, which assesses implementation in practice, and with structured follow-up.

We urge States Parties to adopt review documents for the IRM next phase that reflect its new scope, and to revisit systematically the recommendations from previous review cycles, covering:

- progress in implementing those recommendations, including their practical implementation and impact, based on results achieved;
- remaining implementation challenges;
- the impact of technical assistance (TA) received and the priority sectors requiring it;
- other developments in UNCAC implementation since earlier reviews were completed, including corruption trends and circumstances in which corruption offences are committed, emerging cross-cutting issues, and the implementation of relevant CoSP resolutions.

Furthermore, we urge States Parties to strengthen:[18]

1. **Stakeholder participation,** by:

a. **Ensuring early engagement,** including access to review information and opportunities to provide written and oral input.

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

[18] 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-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.

b. **Preparing the self-assessment checklist (SACL) through broad consultations and ensuring dedicated meetings** between peer reviewers and civil society.

a. **Considering information provided by independent non-governmental stakeholders** for the reviews.[19]

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

2. **Transparency, by:**

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

b. Providing regular updates on review progress.

c. Publishing the list of stakeholders engaged in the review and how they were engaged.[20]

d. Annexing stakeholder input to the country review report.[21]

e. Publicly communicating review outcomes through joint UNODC-State Party announcements when executive summaries and country review reports are published.

f. Publishing updates on implementation of review recommendations ahead of CoSP sessions.

The Coalition and its SWANA community stand ready to support the Implementation Review Group and UNCAC States Parties in applying these recommendations, and look forward to continued dialogue ahead of, during and after the CoSP Special Session.

[19] In line with resolution 11/2, operative paragraph (OP) 12.
[20] In line with resolution 11/2, operative paragraph (OP) 12. The names of the non-governmental stakeholders involved should only be included if they consent to this inclusion. In some contexts, this may not be desirable due to security or retaliation concerns.
[21] In line with resolution 11/2, operative paragraph (OP) 12.