Asia-Pacific civil society insights and recommendations for the UNCAC Implementation Review Mechanism

Global Civil Society Coalition for the UNCAC

Regional Submission to the 2026 CoSP Special Session

6 October 2026

Member civil society organisations from the Asia-Pacific region of the Global Civil Society Coalition for the UNCAC[1] ('the Coalition') make this submission to inform discussions at the 2026 Special Session of the Conference of the States Parties (CoSP). Validated through an open regional consultation, it reflects the perspectives of civil society from a region representing approximately 60% of the world's population.

The submission reviews the inclusivity and transparency of the second-cycle review of the first phase of the UNCAC Implementation Review Mechanism (IRM), identifies common implementation challenges emerging from the first-cycle reviews, and presents recommendations for the next phase of the IRM based on regional civil society experience. We urge States Parties to take these recommendations into account when launching the next phase and when implementing country review mechanisms that are more transparent, inclusive, effective, and responsive to implementation in practice.

1. First Phase Reviews in hindsight: Transparency and inclusivity

Fifteen The Asia-Pacific region comprises 44 UNCAC States Parties. By September 2026, 27 reviews had reportedly been completed, 14 remained ongoing, and the status of three reviews was not publicly known.[2] Almost all Asia-Pacific States Parties have completed their first cycle reviews, with the exception of one. As the first phase of the IRM draws to a close, the region has an opportunity to strengthen transparency and stakeholder participation in the remaining reviews while carrying these lessons into the next phase.

Transparency during the both review cycles remained uneven. Although 41 of the 44 States had reportedly completed the self-assessment checklist in the second cycle, only two had made it publicly available – with an additional one obtained through the Coalition's Access to Information (ATI) Campaign. In the first review cycle, only four self-assessment checklists were made public.[3] Comprehensive publication of review outcomes has also remained limited.

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[1] Has been known as the UNCAC Coalition.

[2] Global Civil Society Coalition for the UNCAC. UNCAC Review Status Tracker https://uncaccoalition.org/uncacreviewstatustracker/ and UNODC. Country Profiles https://www.unodc.org/corruption/en/country-profiles/view/search.html

[3] Publication of the self-assessment checklist, as indicated on the Coalition's UNCAC Review Status Tracker, https://docs.google.com/spreadsheets/d/1uVcQ8xT7bJwkVsQZ7yT6bOfq7gxL4kQBOGOafqNJiCE/edit?gid=0#gid=0, for the:

Of the 27 completed reviews in the second cycle, only 14 States (52%) had published their full country review reports – with an additional one obtained through the Coalition's ATI Campaign.[4] In the first review cycle, 15 States across the region made their country reports public.

Coalition-supported parallel reports[5] on UNCAC implementation and the Coalition's mapping of civil society participation in the country reviews found that self-assessment checklists were rarely shared with civil society before country visits. Consequently, even where organisations were invited to participate in the country visit, they frequently lacked access to the principal document underpinning the review, limiting their ability to provide informed and evidence-based contributions.

Civil society participation likewise remained inconsistent and largely ad hoc, dependent on government discretion rather than institutionalised procedures. Positive examples included governments proactively reaching out to civil society prior to the review to engage in the process,[6] providing advance notice of country visits,[7] allocating sufficient time for

- 2nd review cycle: Mongolia, and Sri Lanka on a governmental website. Australia: obtained through the Coalition's Access to Information campaign.
- 1st review cyle: Cambodia, Afghanistan, Australia, Bangladesh.

[4] Publication of the country report, as indicated on the Coalition's UNCAC Review Status Tracker, for the:

- 2nd review cycle: Mongolia, Pakistan, Fiji, Palau, Philippines, Tuvalu, Australia, Kiribati, Lao People's Democratic Republic, Thailand, Viet Nam, Malaysia, Solomon Islands, Sri Lanka. Maldives: obtained through the Coalition's Access to Information campaign.
- 1st review cycle: Cambodia, Cook Islands, New Zealand, Samoa, Singapore, Thailand, Tuvalu, Vanuatu, Malaysia, Sri Lanka, Australia, Brunei Darussalam, Lao People's Democratic Republic, Philippines, Viet Nam.

[5] Coalition-supported civil society parallel reports have been published in 9 countries, under the second review cycle of the first phase: Bangladesh, Cambodia, Kyrgyzstan, Mongolia, Nepal, Pakistan, Papua New Guinea, Sri Lanka and Uzbekistan. (Global Civil Society Coalition for the UNCAC. Civil Society Parallel Reports. https://uncaccoalition.org/resources/civil-society-parallel-reports/2nd-cycle/) ; Another 7 were published under the first cycle of the first phase: Bangladesh, Mongolia, Nepal, Nepal, Papua New Guinea, Philippines, Vietnam. (Global Civil Society Coalition for the UNCAC. Civil Society Parallel Reports. Civil Society Parallel Reports for 1st cycle UNCAC review cycle (2010-2015), https://uncaccoalition.org/resources/civil-society-parallel-reports/1st-cycle/).

[6] In Australia, Cambodia, Mongolia and Papua New Guinea, the governments reached out to civil society, inviting them to join the review process. (Global Civil Society Coalition for the UNCAC (2023). 20 years of UNCAC - How civil society participates in UNCAC implementation reviews. https://uncaccoalition.org/20-years-of-uncac/)

[7] In Australia, Cambodia, Mongolia and Papua New Guinea, civil society was invited to participate in the country visit at least two weeks prior the visit. (UNODC (2026). CAC/COSP/IRG/2026/NGO/9. https://track.unodc.org/uploads/documents/UNCAC/WorkingGroups/ImplementationReviewGroup/18-22May2026/ngo/CAC-COSP-IRG-2026-NGO-9.pdf)

discussions,[8] inviting civil society to make written submissions after country visits,[9] and sharing review findings and recommendations following completion of the review.[10] These practices demonstrate that more meaningful stakeholder participation is achievable and should become standard practice during the next phase of the IRM.

2. First-Cycle Review in hindsight: Common challenges identified in the region and follow-up on recommendations[11]

The first cycle of the IRM reviewed implementation of UNCAC Chapters III (Criminalisation and Law Enforcement) and IV (International Cooperation). While global and thematic analyses have documented measures taken by States following their country reviews, there remains limited systematic regional evidence on the implementation of first-cycle recommendations in the Asia-Pacific. Nevertheless, the first-cycle reviews identified several recurring implementation challenges across the region.[12] Such common challenges included:

[8] For example, three hours in Mongolia and a full-day participation in Papua New Guinea. Global Civil Society Coalition for the UNCAC (2023). 20 years of UNCAC - How civil society participates in UNCAC implementation reviews. https://uncaccoalition.org/20-years-of-uncac/)

[9] For instance, in Papua New Guinea (Ibid).

[10] In Australia, a discussion with civil society was held while in Mongolia, a short presentation on UNCAC review findings was held with over 30 CSOs present. There was also a short session about the report findings during a training for NGO representatives. (UNODC (2026). CAC/COSP/IRG/2026/NGO/9. https://track.unodc.org/uploads/documents/UNCAC/WorkingGroups/ImplementationReviewGroup/18-22May2026/ngo/CAC-COSP-IRG-2026-NGO-9.pdf)

[11] Since the completion of first-cycle reviews, only six Asia-Pacific States Parties (Australia, Kazakhstan, Malaysia, Singapore, Thailand and Viet Nam) have publicly reported follow-up measures taken in response to their review recommendations. (UNODC. Country Profiles https://www.unodc.org/corruption/en/country-profiles/view/search.html)
As a result, it is difficult for civil society organizations to assess the current status of implementation across the region. This information gap is expected to be addressed, at least in part, through the next phase of the IRM, which is intended to build on the outcomes of previous review cycles.

[12] UNODC (2017). State of implementation of the United Nations Convention against Corruption Criminalization, law enforcement and international cooperation, Second edition https://track.unodc.org/track/uploads/res/track/resourcehub/state-of-implementation-of-the-uncac_-criminalization--law-enforcement-and-international-cooperation_html/UNODC_2017_State_of_Implementation_of_the_United_Nations_Convention_against_Corruption-_Criminalization_Law_Enforcement_and_International_Cooperation.pdf, UNODC (2024). Implementation of UNCAC chapter III: Criminalization and law enforcement in ASEAN States Parties and Timor-Leste https://track.unodc.org/uploads/documents/AC-hubs-and-platforms/south-east-asia/Implementation_of_UNCAC_chapter_III_Criminalization_and_law_enforcement_in_ASEAN_States_parties_and_Timor-Leste.pdf

1. Incomplete criminalisation of certain corruption offences (particularly bribery of foreign public officials and private sector bribery);[13]
2. Weak law enforcement and inter-agency coordination;[14]
3. Limited recognition of UNCAC offences for extradition purposes;[15]
4. Absent, weak or procedurally complex mutual legal assistance mechanisms (including restrictive approaches to dual criminality and limited provisions on freezing, seizure and confiscation);[16]
5. Inadequate protection for witnesses, experts and victims;[17]
6. Uneven regulation and limited use of special investigative techniques.[18]

These regional challenges were reflected in the recommendations issued to States Parties. Among Indo-Pacific Economic Framework (IPEF) partners, the highest number of recommendations related to the criminalisation of bribery of foreign public officials and officials of public international organisations, protection of reporting persons, freezing, seizure and confiscation of property, witness, expert and victim protection,[19] mutual legal assistance

[13] UNODC (2025). Implementation of UNCAC chapter III: Criminalization and law enforcement by IPEF partners. P. 13 https://www.unodc.org/roseap/uploads/documents/Publications/2025/IPEF_Paper_Implementation_of_UNCAC_Chapter_III._Criminalization_and_law_enforcement.pdf

[14] See, for instance, CAC/COSP/IRG/I/2/1/Add.23., P. 6 https://www.unodc.org/documents/treaties/UNCAC/WorkingGroups/ImplementationReviewGroup/ExecutiveSummaries/V1388707e.pdf and CAC/COSP/IRG/I/1/1/Add.8., P. 10 https://www.unodc.org/documents/treaties/UNCAC/WorkingGroups/ImplementationReviewGroup/ExecutiveSummaries/V1254364e.pdf

[15] See, for instance, CAC/COSP/IRG/I/1/1/Add.8., P. 11 https://www.unodc.org/documents/treaties/UNCAC/WorkingGroups/ImplementationReviewGroup/ExecutiveSummaries/V1254364e.pdf

[16] UNODC (2025). Implementation of UNCAC chapter IV: Criminalization and law enforcement by IPEF partners. P. 35 https://www.unodc.org/roseap/uploads/documents/Publications/2025/IPEF_Paper_Implementation_of_UNCAC_Chapter_IV._International_cooperation.pdf

[17] UNODC (2016). CAC/COSP/IRG/2016/5. P. 2 https://www.unodc.org/documents/treaties/UNCAC/WorkingGroups/ImplementationReviewGroup/20-24June2016/V1602456e.pdf

[18] Ibid. P. 8

[19] UNODC (2025). Implementation of UNCAC chapter III: Criminalization and law enforcement by IPEF partners. https://www.unodc.org/roseap/uploads/documents/Publications/2025/IPEF_Paper_Implementation_of_UNCAC_Chapter_III._Criminalization_and_law_enforcement.pdf

and extradition.[20] Earlier UNODC thematic analyses[21] similarly found that only six of the 37 Asia-Pacific States reviewed had comprehensive witness protection systems, and only 11 had relatively comprehensive legislation governing investigative techniques, with only five countries reporting practical experience using special investigative techniques in corruption cases. States of Oceania, in particular, suffered from significant resource, institutional and technological capability constraints.

As the IRM enters its next phase, these findings provide an important baseline against which progress can be assessed. However, many first-cycle reviews were completed more than a decade ago, and publicly available information on follow-up remains limited. Although a small number of States have reported legal, operational and administrative measures taken in response to review recommendations,[22] there is insufficient regional evidence to assess the extent to which the common challenges identified during the first cycle have since been addressed in practice. This underscores the importance of the next phase of the IRM, which focuses on the implementation of first cycle review recommendations, and is intended to place

[20] UNODC (2025). Implementation of UNCAC chapter IV: Criminalization and law enforcement by IPEF partners. https://www.unodc.org/roseap/uploads/documents/Publications/2025/IPEF_Paper_Implementation_of_UNCAC_Chapter_IV._International_cooperation.pdf

[21] UNODC (2016) CAC/COSP/IRG/2016/5 https://www.unodc.org/documents/treaties/UNCAC/WorkingGroups/ImplementationReviewGroup/20-24June2016/V1602456e.pdf

[22] Statements at the UNCAC 7th session of the IRG: Afghanistan, Solomon Islands, Pakistan, Brunei Darussalam, the Philippines, UNCAC Review Recommendations: Thailand, Malaysia, Update on measures taken by Australia to implement recommendations pursuant to Chapter III (Criminalisation and law enforcement) and Chapter IV (International cooperation) of the UNCAC, Response to Note verbal No. CU 2023/247/(A)DTA/CEB/CSS dated July 19, 2023 of the UNCAC Secretariat by Viet Nam, Update from Indonesia
Examples of follow-up actions: Thailand amended the definition of assets in the anti-money-laundering legislation to facilitate seizure and freezing of the proceeds of corruption and reported to have taken measures such as capacity-building exercises, training and exchange of intelligence to improve inter-agency cooperation. Viet Nam reported issuance of legislation that includes special investigative techniques. Bhutan reported improving anti-corruption legislation to criminalise the bribery of witnesses and adopting regulations to address challenges in the administration of frozen, seized and confiscated assets. Myanmar introduced legal provisions to criminalise the bribery in the private sector and amended their relevant legislation to broaden the scope of the predicate offences of money laundering. Malaysia has taken measures to strengthen the witness protections and reporting systems along with necessary legislative amendments. Malaysia and Myanmar have also reported to have adopted new bilateral or multilateral agreements for mutual legal assistance and extradition. UNODC (2023) CAC/COSP/2023/8 https://www.unodc.org/documents/treaties/UNCAC/COSP/session10/CAC-COSP-2023-8/2319919E.pdf and UNODC (2025) CAC/COSP/2025/9 https://track.unodc.org/uploads/documents/UNCAC/COSP/session11/CAC-COSP-2025-9/2516877E.pdf

greater emphasis on implementation in practice and voluntary reporting on follow-up measures after reviews are completed.

3. Recommendations for the next phase of the IRM

Resolution 11/2 adopted at the eleventh session of the CoSP provides an opportunity to build on the experience of the first phase of the IRM.[23] By placing greater emphasis on implementation in practice, transparency, meaningful stakeholder participation, technical assistance outcomes and voluntary follow-up reporting, the next phase offers an opportunity not only to strengthen the review process itself but also to assess progress in addressing recommendations and implementation gaps identified during the previous cycles. [24]

Coalition-supported parallel reports identify several practices that contributed to more transparent and inclusive reviews, including proactive publication of review documentation, proactive and open consultation with a wider group of stakeholders, adequate timeframe for participation, confidential engagement with peer reviewers and greater transparency regarding how stakeholder input was considered. These experiences inform the recommendations set out below.

Overarching recommendation

We urge the States Parties to adopt adequate key review documents (Self-Assessment questionnaire, full country report, and executive summary) that reflect the next phase's new scope, and to make full use of this opportunity by systematically revisiting recommendations from previous review cycles, addressing new developments since the first phase country reviews, and in particular, reporting on:

- The progress made in implementing those recommendations;
- The practical impact of those measures;
- Remaining implementation challenges;
- The impact of technical assistance (TA) received and more precise identification of priority sectors requiring TA;
- Other developments in UNCAC implementation since the completion of earlier reviews.

[23] https://www.unodc.org/corruption/en/cosp/conference/session11-resolutions.html#Res.11-2

[24] Please see Global Civil Society Coalition for the UNCAC (2026). Shaping the Next Phase of the UNCAC Review Mechanism: Towards More Transparent, Inclusive and Impactful Country Reviews https://uncaccoalition.org/shaping-the-next-phase-of-the-uncac-review-mechanism-towards-more-transparent-inclusive-and-impactful-country-reviews/, https://uncaccoalition.org/wp-content/uploads/UNCAC-Coalition-%E2%80%93-Guide-to-Transparency-and-Participation-in-the-IRM-Dec.-2022.pdf and Global Civil Society Coalition for the UNCAC (2022) A Guide to Transparency and Participation in the UNCAC Implementation Review Mechanism https://track.unodc.org/uploads/documents/UNCAC/COSP/session11/ngos/CAC-COSP-2025-NGO-16.pdf for more information

Participation

Stakeholder participation in the IRM remains a priority for the region. Therefore, we recommend that States Parties under review strengthen the engagement of stakeholders throughout the review process by:

1. **Ensuring early engagement**, including publishing focal point contact details, indicative review timelines and inviting written submissions at the outset of the review.
2. **Preparing the Self-Assessment Checklist (SACL) through broad national consultations** with civil society, academia, the private sector and other groups outside the public sector.
3. **Facilitating meaningful participation during country visits**, including dedicated sessions with a formal agenda, between the review team and other stakeholders, supported by sufficient time for preparation and discussion.
4. **Permitting the reviewing States to consider information provided by non-governmental stakeholders in the preparation of country review reports** [25]
5. **Developing national follow-up plans** to implement review findings and recommendations, through inclusive consultation processes.
6. **Expanding opportunities for civil society engagement within IRM**, including participation as observers during Implementation Review Group (IRG) sessions.
7. **Involving individuals and groups outside the public sector to contribute to the development and implementation of TA programmes**, where appropriate and upon request.

Transparency

We urge that States Parties and the Secretariat strengthen the transparency of the review process by:

1. **Publishing all principal outcome documents**, including the SACL, executive summary and full country review report, on the respective UNODC country profile page.
2. **Providing regular public updates on the progress of the country reviews**, including review schedules, country visits, expected publication dates for the above documents and other key milestones.
3. **Providing comprehensive information on the engagement with other stakeholders** in the review, including the list of Stakeholders and how they were engaged.[26]
4. **Adding an annex to the country review report** that includes input provided by other stakeholders. [27]
5. **Publicly communicating review outcomes**, including through joint announcements by UNODC and the State Party, upon the publication of the executive summaries and country review reports.
6. **Publishing periodic updates and information on implementation of review recommendations ahead of CoSP sessions.**

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

[26] Ibid.

[27] Ibid.