



## From commitment to implementation: Addressing corruption enabling crimes that affect the environment

Global Civil Society Coalition for the UNCAC's  
Environmental Crime and Corruption Working Group

Submission to the 17th Session of the Implementation Review Group

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The Working Group on Environmental Crime and Corruption of the Global Civil Society Coalition for the UNCAC, representing over 230 civil society representatives globally, calls on UNCAC States Parties to prioritise addressing corruption that facilitates crimes that affect the environment (CAE) as a central focus of UNCAC implementation, in particular through the effective implementation and review of Conference of the States Parties (CoSP) Resolution 11/9 (2025) on preventing and combating corruption as it relates to CAE.

CAE are serious, transnational organised crimes that often intersect with other forms of organised crime, including corruption and money-laundering. These crimes pose significant threats to global security, including climate and pollution risks, as well as to biodiversity, rule of law, and people, undermining progress towards the Sustainable Development Goals (SDGs).<sup>1</sup> They also pose systemic risks to the global financial system due to illicit financial flows linked to CAE and related financial crimes.<sup>2</sup>

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<sup>1</sup> UNODC, "Preventing and combating corruption as it relates to crimes that have an impact on the environment", 2021. [https://www.unodc.org/documents/treaties/UNCAC/COSP/session9/CAC-COSP-2021-CRP.8\\_E.pdf](https://www.unodc.org/documents/treaties/UNCAC/COSP/session9/CAC-COSP-2021-CRP.8_E.pdf); Andre Francisco Pilon, "The Bubbles or the Boiling Water? Ways to regenerate the Earth and Humanity", Katoikos, 2025. <https://katoikos.world/analysis/the-bubbles-or-the-boiling-water-ways-to-regenerate-the-earth-and-humanity.html>, which highlights that these crimes often thrive in contexts where weak governance and certain legally sanctioned but environmentally harmful practices further erode oversight and enforcement; UNODC and World Wildlife Fund (WWF), "Crimes that affect the environment and climate change", UNODC and WWF, 2022. [https://www.unodc.org/res/environment-climate/resources\\_html/Crimes\\_that\\_Affect\\_the\\_Environment\\_and\\_Climate\\_Change.pdf](https://www.unodc.org/res/environment-climate/resources_html/Crimes_that_Affect_the_Environment_and_Climate_Change.pdf); Transparency International (TI), "Climate & corruption case atlas", Transparency International Climate Governance Integrity Programme, n.d. <https://www.transparency.org/en/projects/climate-governance-integrity-programme/climate-corruption-atlas> which includes 83 cases across the globe showcasing the impact of corruption on the climate; Global Atlas of Environmental Justice, n.d. <https://ejatlas.org/> which has documented over 4,300 socio-environmental conflicts worldwide, with close to 70 cases across the globe showcasing the impact of corruption on global warming; Global Civil Society Coalition for the UNCAC's Working Group on Environmental Crime and Corruption, "Breaking the silos: combating corruption and environmental crime to advance climate protection goals", UNCAC Coalition and Wildlife Justice Commission (WJC), 2024. <https://uncaccoalition.org/breaking-the-silos-combating-corruption-and-environmental-crime-to-advance-climate-protection-goals>.

<sup>2</sup> Christian Nellemann, Rune Henriksen, Riccardo Pravettoni, Davyth Stewart, Maria Kotsoyova, Margaretha Schlingemann, Mark Shaw, Tuesday Reitano. (Eds). 2018. World atlas of illicit flows. A RHIPTO-



Corruption enables organised criminal networks to commit and profit from CAE while evading detection, apprehension, and prosecution.<sup>3</sup> At the same time, corruption and related illicit financial flows drain public resources, weaken institutions, erode social justice, and undermine the effective allocation of funds for environmental protection and climate finance.<sup>4</sup> The resulting environmental, social, and economic harms are often severe and irreversible.

With the adoption of Resolution 11/9, and Resolution 11/3 on strengthening the implementation of the UNCAC in small island developing States (SIDS) – which recognises the links between corruption, CAE, and the mismanagement of sustainability finance and encourages enhanced transparency, integrity, and accountability mechanisms in relation to climate finance<sup>5</sup> – States Parties have made important commitments to address these interlinkages. States must now ensure that these

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INTERPOL-GI Assessment. RHIPTO-Norwegian Center for Global Analyses, INTERPOL and the Global Initiative Against Transnational Organized Crime (GI-TOC). ISBN 978-82-690434-2-6 Printed by RHIPTO, which estimates that organized environmental crime generates USD110–281 billion annually in criminal proceeds.

<sup>3</sup> David Aled Williams, "Transnational environmental crime and corruption," in *Research Handbook on Environmental Crimes and Criminal Enforcement*, edited by S. L. Smith and L. Sahramaki (Edward Elgar Publishing, 2024), pp. 246 - 262.

<https://www.elgaronline.com/edcollbook/book/9781035309511/9781035309511.xml>; Organisation for Economic Co-operation and Development (OECD). "OECD Foreign Bribery Report: An analysis of the crime of bribery of foreign public officials," OECD, 2014. [https://www.oecd.org/content/dam/oecd/en/publications/reports/2014/12/oecd-foreign-bribery-report\\_g1g4d808/9789264226616-en.pdf](https://www.oecd.org/content/dam/oecd/en/publications/reports/2014/12/oecd-foreign-bribery-report_g1g4d808/9789264226616-en.pdf) according to which one in five cases of transnational bribery involves the extractive sector.

<sup>4</sup> World Bank Group, Global Wildlife Program (GWP) and Global Environmental Facility (GEF). "Illegal logging, fishing, and wildlife trade: the costs and how to combat it," World Bank Group, GWP and GEF, 2019. <https://thedocs.worldbank.org/en/doc/482771571323560234-0120022019/original/WBGReport1017Digital.pdf> which estimates that the global value of illegal logging, fishing and wildlife trade in 2016 was USD1–2 trillion, and that governments in source countries lose around USD7–12 billion per year in revenues. UNODC and World Bank Group. "Addressing corruption risks to safeguard the response to climate change: Discussion Draft II," United Nations, 2024. [https://track.unodc.org/uploads/documents/corruption/Publications/2024/Addressing\\_Corruption\\_Risks\\_to\\_Safeguard\\_the\\_Response\\_to\\_Climate\\_Change\\_Discussion\\_Draft\\_II.pdf](https://track.unodc.org/uploads/documents/corruption/Publications/2024/Addressing_Corruption_Risks_to_Safeguard_the_Response_to_Climate_Change_Discussion_Draft_II.pdf); Michael Nest, Saul Mullard and Cecilie Wathne, "Corruption and climate finance: implications for climate change interventions," U4 Brief 2020:14 (2020). <https://www.u4.no/api/publications/corruption-and-climate-finance/pdf>; Michael Nest and Saul Mullard, "Climate governance in a fast-changing world: evolving patterns of corruption risks," U4 Issue 2025:2 (2025). <https://www.u4.no/api/publications/climate-governance-in-a-fast-changing-world-evolving-patterns-of-corruption-risks/pdf>; World Bank, GCF, TI. "2nd Symposium on supranational responses to corruption: integrity in climate finance & action knowledge report"; Club of Rome, "Open Letter on COP Reform to all States that are Parties to the Convention," Club of Rome, 2024. <https://www.clubofrome.org/cop-reform-2024/> calling for improved oversight of climate financing flows reinforces the urgency of tackling corruption in climate governance; International Court of Justice. *Obligations of States in respect of climate change*, Advisory Opinion, I.C.J. (2025). <https://www.icj-cij.org/sites/default/files/case-related/187/187-20250723-adv-01-00-en.pdf> stating that nations can be held legally accountable for their greenhouse-gas emissions significantly strengthens the legal and moral case for mobilizing much greater flows of climate funding.

<sup>5</sup> See Resolution 11/3, OP11.



commitments are operationalised and embedded within the implementation of UNCAC, including through its intergovernmental processes and review mechanism.

The Implementation Review Group (IRG) and the Working Group on Prevention of Corruption provide essential platforms to advance this agenda, including through the exchange of information, practices, and experiences in Convention implementation to address these crimes.

## **1. Advancing implementation of Resolution 11/9 in domestic frameworks**

Resolutions 11/9 and 8/12<sup>6</sup> provide a strong framework for action. States Parties should prioritise translating these commitments into their national anti-corruption strategies and frameworks.

### ***Preventive measures***

In line with the thematic focus of these sessions, strengthening preventive measures is essential to addressing corruption enabling CAE.

States Parties should:

- **Strengthen integrity frameworks and preventive anti-corruption tools** in the public and private sectors, particularly in state institutions involved in environmental regulation and protection, and along private sector supply chains linked to the environment, waste, and natural resources.<sup>7</sup>
- **Promote integrity, transparency, accountability, and effectiveness across the full public procurement cycle**, including awarding contracts,<sup>8</sup> concessions, permits, and licenses in the natural resource, waste management, and climate sectors, introducing conflict of interest measures, and preventing infiltration by criminal actors.<sup>9</sup>
- **Guarantee effective access to environmental information, open environmental databases, and other relevant information to tackle CAE and corruption:** establish or strengthen comprehensive access to information laws to ensure effective access to information, including environmental information, open environmental databases, free and widespread access to Earth observation satellite data of land use and environmental change, information on revenues

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<sup>6</sup> Resolution 8/12, adopted at CoSP8. United Nations Office on Drugs and Crime. *Preventing and Combating Corruption as It Relates to Crimes That Have an Impact on the Environment*. CAC/COSP/2021/CRP.8. Vienna: United Nations, 2021: [https://www.unodc.org/documents/treaties/UNCAC/COSP/session9/CAC-COSP-2021-CRP.8\\_E.pdf](https://www.unodc.org/documents/treaties/UNCAC/COSP/session9/CAC-COSP-2021-CRP.8_E.pdf).

<sup>7</sup> See Resolution 11/9, OPs 2 and 8.

<sup>8</sup> Including national-level subcontracting.

<sup>9</sup> Ibid OP 2. This includes leveraging or adopting international transparency standards on natural resource governance.



and revenue flows, and other relevant data to ensure its availability to Indigenous Peoples, communities, and other non-state actors and **access to adequate, accurate and up-to-date beneficial ownership information<sup>10</sup> through publicly-available, central registers.**<sup>11</sup>

- **Strengthen protection of reporting persons** by establishing and strengthening confidential complaint systems, and whistleblower protection programmes,<sup>12</sup> including protected reporting systems, effective witness protection measures, and ensuring protection against retaliation.<sup>13</sup>
- **Address the role of enablers related to corruption and CAE**, including banks, corporate service providers, and other relevant actors.<sup>14</sup>

### ***Criminalisation and enforcement***

Effective implementation of Resolution 11/9 also requires strengthened criminalisation and enforcement measures. States Parties should:

- **Promote enforcement responses grounded in the rule of law and respect for international human rights standards**, focusing efforts on high-level actors and avoiding criminalising poverty.<sup>15</sup>
- **Strengthen measures to detect, investigate, prosecute, and adjudicate corruption enabling CAE through improved inter-agency and international cooperation, joint investigations, task forces, financial investigations, and special investigative techniques**, supported by adequate resources.<sup>16</sup>
- **Promote the use of technologies** to prevent, investigate, and combat corruption enabling CAE, in cooperation with other States, as well as with relevant organisations and stakeholders, including satellite and drone imagery, electronic permitting systems, or artificial intelligence tools to identify suspicious financial patterns.<sup>17</sup>

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<sup>10</sup> Including on politically exposed persons or excluded individuals holding ownership rights in the natural resource, waste, and climate sectors.

<sup>11</sup> Building upon Resolution 11/9, OPs 3 and 13; Resolution 11/4, OP20. For more general recommendations on enhancing access to information, please refer to the Coalition's separate written submission on the topic for the 17th Session of the IRG.

<sup>12</sup> Whistleblower incentive programmes are another possible approach.

<sup>13</sup> Building upon Resolution 11/9, OP6; Resolution 8/12, OP 12.

<sup>14</sup> See Resolution 11/9, OPs 14 and 15.

<sup>15</sup> See Wildlife Justice Commission. "Is wildlife trafficking being treated as serious crime?", 2025, p. 42. <https://wildlifejustice.org/wp-content/uploads/2025/10/is-wildlife-trafficking-being-treated-as-serious-crime-v5.pdf>

<sup>16</sup> Ibid OPs 5, 10 and 12; Resolution 8/12, OP 11. This includes sharing information on emerging risks.

<sup>17</sup> See Resolution 11/9, OP 4.



- **Prevent the transfer of proceeds of corruption enabling CAE and promote asset recovery and return.**<sup>18</sup>

## **2. Embedding Resolution 11/9 commitments in UNCAC implementation and review processes**

To ensure sustained and measurable progress, the implementation of Resolution 11/9 should be systematically integrated into UNCAC's intergovernmental and review processes.

States Parties are encouraged to:

- **Leverage the IRG** as a platform for voluntary reporting on progress in implementing Resolution 11/9, including by sharing experiences, challenges, and lessons learned in applying UNCAC provisions to address corruption enabling CAE.
- **Utilise the Working Group on Prevention of Corruption** to advance sustained thematic discussions on preventive approaches to address corruption enabling CAE, and to inform the dedicated discussions mandated by Resolution 11/9 at its 18th session in 2027.<sup>19</sup>
- **Identify technical assistance needs** related to this topic through UNCAC processes, including in areas such as corruption and financial investigations, public procurement integrity, beneficial ownership systems, integrity safeguards in climate finance, and whistleblower protection frameworks.
- **Promote more systematic monitoring and reporting on commitments made in UNCAC resolutions**, in particular Resolution 11/9, including by integrating relevant measures into existing UNCAC reporting frameworks. As part of the 2nd phase of the Implementation Review Mechanism, States should provide updates on measures taken since their previous country review, including steps taken to implement resolutions addressing corruption and CAE, how those frameworks are being applied in practice, and the concrete outcomes and results achieved.<sup>20</sup>

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<sup>18</sup> Ibid OP 11.

<sup>19</sup> This includes sharing good practices, lessons learned, and challenges in the use of anti-corruption and integrity tools, with a view to informing technical assistance, capacity-building, and national policy development. See Resolution 11/9, OP 16.

<sup>20</sup> States should also carry out their country reviews in an inclusive and transparent manner - involving civil society actors at key stages of the review process and in follow-up efforts, publishing country reports, timelines for reviews and upcoming review visits and other information. See Resolution 11/2 on the 2nd phase of the IRM, which includes a higher level of transparency, inclusiveness, and implementation in practice, and lowers the barrier for civil society contributions. For more details see Global Civil Society Coalition for the UNCAC. "Analysis of CoSP11 adopted resolutions", 2026. <https://uncaccoalition.org/analysis-of-cosp11-adopted-resolutions/>.



### **3. Addressing remaining gaps and strengthening coherence**

While Resolution 11/9 provides a strong foundation, further efforts are needed to address persistent gaps. States Parties should:

- **Ensure that all CAE are consistently treated as predicate offences for money laundering** to enable the use of financial investigations and asset return and compensation;<sup>21</sup> and **ensure recovered assets from corruption enabling CAE are redirected to environmental restoration, and social harm reparations.**<sup>22</sup>
- **Tackle the convergence between CAE and other serious forms of crime** such as drug trafficking, human trafficking, migrant smuggling, money-laundering, and corruption by adopting a holistic, intelligence-led approach to investigating and dismantling criminal networks.<sup>23</sup>
- **Promote transparency and accountability in the management, allocation, and use of climate finance funds and climate finance reporting** including through independent audits, transparent reporting systems, public oversight and monitoring, and safeguards to prevent misuse, diversion, or misallocation of funds.<sup>24</sup>

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<sup>21</sup> Implementation gaps persist in some jurisdictions where CAE under sectoral laws (e.g. mining) are not treated as predicate offences, unlike CAE under environmental laws, underscoring the need for consistency across legal frameworks.

<sup>22</sup> See Article 23 of UNCAC and "The FATF Recommendations", 2023, p. 123, <https://www.fatf-gafi.org/en/publications/Fatfrecommendations/Fatf-recommendations.html> which designate environmental crime in the list of designated categories of offences. See Resolution 8/12. See FATF. "Money Laundering from Environmental Crime", 2021. <https://www.fatf-gafi.org/en/publications/Environmentalcrime/Money-laundering-from-environmental-crime.html>; World Bank, GCF, TI. "2nd Symposium on supranational responses to corruption: integrity in climate finance & action knowledge report" which includes recommendations for reparations to victims and communities suffering from corruption related to climate; Juanita Olaya Garcia, "Reparations for corruption: how corruption enforcement ignores victims' rights", UNCAC Coalition, 2020. <https://uncaccoalition.org/reparations-for-corruption-how-corruption-enforcement-ignores-victims-rights/>

<sup>23</sup> Wildlife Justice Commission. "Convergence of wildlife crime with other forms of organised crime: A 2023 Review", 2023. <https://wildlifejustice.org/wp-content/uploads/2024/02/Crime-Convergence-Report-2023-SPREADS-V07-1.pdf>; WWF. "Crime convergence: Natural resource exploitation and transnational organized crime", <https://www.worldwildlife.org/our-work/wildlife/wildlife-crime/crime-convergence-natural-resource-exploitation-and-transnational-organized-crime/>; The Economist. "The school for wildlife traffickers", October 2025. <https://www.economist.com/1843/2025/10/16/the-school-for-wildlife-traffickers>.

<sup>24</sup> Building on commitments in Resolution 11/3, these measures should apply broadly to all States, not only SIDS. See Accountability Lab and TAI Collaborative. "The role of civil society oversight and social accountability in climate finance and action", 2024. [https://api.transparency-initiative.org/uploads/The\\_role\\_of\\_civil\\_society\\_oversight\\_and\\_social\\_accountability\\_in\\_climate\\_finance\\_and\\_action\\_3\\_1\\_792386f2fa.pdf](https://api.transparency-initiative.org/uploads/The_role_of_civil_society_oversight_and_social_accountability_in_climate_finance_and_action_3_1_792386f2fa.pdf); TI. "Climate and Social Accountability: A Resource Guide", 2026. [https://knowledgehub.transparencycdn.org/kproducts/Climate-and-Social-Accountability-Resource-Guide-Final\\_AdS.pdf](https://knowledgehub.transparencycdn.org/kproducts/Climate-and-Social-Accountability-Resource-Guide-Final_AdS.pdf); UNODC. "Chapter 4: The nexus between drugs and crimes that affect the environment and convergent crime in the Amazon Basin", World Drug Report 2023; UNODC and WWF, "Crimes that affect the environment and climate change". The [Open letter](#) from world climate leaders



- **Ensure a safe and enabling environment for civil society**, including environmental defenders, Indigenous Peoples, local communities, reporting persons, journalists, and other non-state actors who face threats, attacks and reprisals when exposing corruption enabling CAE, by ensuring that the conditions are present for these actors to carry out their work independently and without fear of reprisals.<sup>25</sup>
- **Promote meaningful engagement with civil society as partners in implementation, monitoring, and technical assistance.**<sup>26</sup>
- **Enhance coordination with other international frameworks and bodies**, including UNTOC, the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), Convention on Biological Diversity (CBD), the UN Framework Convention on Climate Change (UNFCCC), and the Human Rights Council,<sup>27</sup> to ensure a holistic response to the interconnected challenges of corruption, organised crime, biodiversity loss, climate change, pollution, and adverse impacts on people.<sup>28</sup> In particular, **cooperation between the UNCAC**

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released at COP29 includes a recommendation to ensure robust tracking of climate financing; also see : [C20 Working Group 3 Policy Brief: Environment, Climate Justice and Just Energy Transition](#) (para 2 on Climate Finance).

<sup>25</sup> Transparency International. "Corruption perceptions index 2024," TI, 2024. [https://www.transparency.de/fileadmin/Redaktion/CPI2024\\_Report\\_EN.pdf](https://www.transparency.de/fileadmin/Redaktion/CPI2024_Report_EN.pdf); United Nations General Assembly. "At the heart of the struggle: human rights defenders working against corruption - Report of the Special Rapporteur on the situation of human rights defenders, Mary Lawlor." A/HRC/49/49, December 28 2021. <https://documents.un.org/doc/undoc/gen/g21/396/47/pdf/g2139647.pdf?OpenElement>; Global Witness. "Missing voices: the violent erasure of land and environmental defenders," Global Witness, 2024. [https://gw.cdn.ngo/media/documents/Missing\\_Voices\\_-\\_Global\\_Witness\\_land\\_and\\_environmental\\_defenders\\_report.pdf](https://gw.cdn.ngo/media/documents/Missing_Voices_-_Global_Witness_land_and_environmental_defenders_report.pdf).

<sup>26</sup> Building upon Resolution 10/5, OP 12.

<sup>27</sup> Coordination with other frameworks should be encouraged, including the Basel Convention on the Control of Transboundary Movements of Hazardous Waste and their Disposal, UN ocean treaties including the UN High Seas Treaty and the International Seabed Authority's deep-sea mining regulations (still in development), and the International Union for Conservation of Nature (IUCN), which adopted resolutions 8.048 "Crimes that Affect the Environment" (encouraging IUCN's active involvement at UNCAC fora) and 8.103 "Safeguarding biodiversity and human rights in energy transition mineral governance" in 2025.

<sup>28</sup> Global Civil Society Coalition for the UNCAC's Working Group on Environmental Crime and Corruption. "Breaking the silos: combating corruption and environmental crime to advance climate protection goals," UNCAC Coalition and WJC, 2024. <https://uncaccoalition.org/breaking-the-silos-combating-corruption-and-environmental-crime-to-advance-climate-protection-goals>; World Bank, GCF, TI. "2nd Symposium on supranational responses to corruption: integrity in climate finance & action knowledge report"; UNODC and World Bank Group. "Addressing corruption risks to safeguard the response to climate change: Discussion Draft II," United Nations, 2024. [https://track.unodc.org/uploads/documents/corruption/Publications/2024/Addressing\\_Corruption\\_Risks\\_to\\_Safeguard\\_the\\_Response\\_to\\_the\\_Climate\\_Change\\_Discussion\\_Draft\\_II.pdf](https://track.unodc.org/uploads/documents/corruption/Publications/2024/Addressing_Corruption_Risks_to_Safeguard_the_Response_to_the_Climate_Change_Discussion_Draft_II.pdf); UNODC and WWF. "Crimes that affect the environment and climate change," UNODC and WWF, 2022. [https://www.unodc.org/res/environment-climate/resources.html/Crimes\\_that\\_Affect\\_the\\_Environment\\_and\\_Climate\\_Change.pdf](https://www.unodc.org/res/environment-climate/resources.html/Crimes_that_Affect_the_Environment_and_Climate_Change.pdf).



**Open-ended Intergovernmental Expert Meeting to Enhance International Cooperation and the UNTOC Working Group on International Cooperation should be strengthened**, together with engagement with relevant international and regional organisations, international financial institutions and NGOs.<sup>29</sup>

## Conclusion

Resolution 11/9 represents a significant advancement in recognising and responding to the nexus between corruption and CAE. The priority now is to ensure that its commitments are translated into sustained, measurable action through their full integration into national frameworks and UNCAC implementation and review processes.

The IRG and the Working Group on the Prevention of Corruption provide important opportunities to advance this work through sharing experiences, identifying good practices, addressing persistent implementation gaps, and coordinating technical assistance where it is most needed. A more structured and visible approach to monitoring implementation – including through the IRM and the engagement of relevant stakeholders – will be essential to enhancing accountability and effectiveness.

Addressing corruption is indispensable to protecting the environment, safeguarding climate action, and achieving the SDGs. Stronger and more coordinated action under UNCAC is urgently needed to combat these crimes.

The Coalition's Working Group stands ready to support States Parties in advancing the effective implementation of Resolution 11/9 and strengthening the role of UNCAC in responding to this urgent and evolving challenge.

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<sup>29</sup> See UNTOC COP, Report on the meeting of the Working Group on International Cooperation held in Vienna from 28 to 30 May 2025, CTOC/COP/WG.3/2025/5, recommendation c).  
[https://www.unodc.org/documents/treaties/International\\_Cooperation\\_2025/5/CTOC\\_COP\\_WG.3\\_2025\\_5\\_E.pdf](https://www.unodc.org/documents/treaties/International_Cooperation_2025/5/CTOC_COP_WG.3_2025_5_E.pdf).