

Anti-corruption priorities from the Global Civil Society Coalition for the UNCAC

Global Civil Society Coalition for the UNCAC¹ Submission to CoSP11

21 November 2025

This year's UN Convention against Corruption (UNCAC) Conference of the States Parties (CoSP11) in Doha, Qatar, marks a pivotal moment in advancing anti-corruption standards. States have engaged in difficult negotiations over the scope and format of the 2nd phase of the UNCAC Implementation Review Mechanism (IRM) since it was agreed upon during CoSP3, also in Doha, in 2009. Sixteen years later, these discussions unfold in a context where civil society faces growing restrictions, and funding cuts are reshaping development priorities worldwide. Ensuring that the IRM remains an effective tool in tackling corruption globally, as well as other global challenges linked to civic space, is critical to holding governments accountable and to safeguarding human rights.

Drawing on consultations held across our global civil society network in 2024 and 2025, the members and affiliated groups of the Global Civil Society Coalition for the UNCAC² have identified the following priority issues that must be addressed by States Parties to effectively implement the UNCAC and adhere to best-practice anti-corruption standards.³

1) Next phase of the UNCAC Implementation Review Mechanism⁴

The UNCAC is the world's most comprehensive, legally binding anti-corruption instrument with near global coverage. Therefore, a robust UNCAC IRM that promotes the implementation of the Convention effectively and inclusively is a cornerstone for tackling corruption around the world.⁵

However, the IRM has several shortcomings that hinder its usefulness. Country reviews take years to be completed, information on the schedule and process is not publicly available, country review reports are not always published in full, civil society and other non-state actors

¹ Has been known as the UNCAC Coalition.

² Formerly known as the UNCAC Coalition.

³ More information on each one of these priority issues can be found in the Communications and Advocacy Toolkit for the CoSP elaborated by the Global Civil Society Coalition for the UNCAC, in five regional submissions and other topical submissions to the CoSP prepared by the Coalition and its Working Groups. <https://uncaccoalition.org/cosp11-communications-advocacy-toolkit/>.

⁴ See another written submission to CoSP11: UNCAC Coalition, "Key recommendations for strengthening the next phase of the Implementation Review Mechanism of the UNCAC", <https://uncaccoalition.org/wp-content/uploads/Key-recommendations-to-strengthen-the-UNCAC-IRM-next-phase-CoSP11-submission-Global-Civil-Society-Coalition-for-the-UNCAC-November-2025.pdf>.

⁵ See UNCAC Coalition's Open Letter "Enhancing Anti-corruption Efforts Globally by Adopting a More Effective, Transparent and Inclusive UNCAC Review Mechanism", 2025. https://uncaccoalition.org/open_letter_irm/.

are not systematically consulted and involved, and there is no mandatory or structured follow-up to the findings and recommendations from country review reports.

The Global Civil Society Coalition for the UNCAC has developed five tools for more transparency and inclusiveness in the UNCAC implementation review process,⁶ which can be used by States Parties and civil society organizations (CSOs) alike, and recommends States Parties to:

- Decisively enhance anti-corruption efforts globally by adopting, at CoSP11, a more effective, efficient, transparent, and inclusive UNCAC Implementation Review Mechanism in its next phase.⁷

2) Environmental Crime and Corruption⁸

Corruption fuels environmental crime, accelerates climate change, and drives biodiversity loss — with devastating consequences for people and the planet. Organized criminal networks involved in environmental crimes depend on corruption at every stage of the global supply chain, as using corruption and money laundering enables their operations and shields them from accountability.⁹ The damage caused is often irreversible, with far-reaching consequences for the environment as well as for human health and public safety, the economy, and the rule of law.

However, there are still major gaps in anti-corruption frameworks and implementation strategies that require urgent attention to effectively tackle corruption in the field of environment and climate change.¹⁰ Therefore, States should:

⁶ See another written submission to CoSP11: UNCAC Coalition, “Meaningful, transparent and inclusive UNCAC reviews”, <https://uncaccoalition.org/wp-content/uploads/Meaningful-transparent-and-inclusive-UNCAC-reviews—CoSP11-submission—Global-Civil-Society-Coalition-for-the-UNCAC—November-2025.pdf> ; and UNCAC Coalition, “Tools for a more transparent and inclusive UNCAC Implementation Review process”, Submission to the 16th resumed UNCAC Implementation Review Group meeting, 2025, <https://track.unodc.org/uploads/documents/UNCAC/WorkingGroups/ImplementationReviewGroup/16-20June2025/CAC-COSP-IRG-2025-NGO-14.pdf>.

⁷ United Nations Office of the High Commissioner for Human Rights (OHCHR), “Joint Statement by a Group of Special Procedures Mandate Holders: Civic Space Must Be Protected and Expanded in Anti-Corruption Efforts—Urging States Parties to the UN Convention against Corruption (UNCAC) to Strengthen the Inclusiveness and Transparency of the Convention’s Review Mechanism”, 2025. <https://www.ohchr.org/sites/default/files/statements/20250822-stm-uncac-cop-sr-assembly.pdf>.

⁸ See another submission to CoSP11 made by the Coalition’s Working Group on Environmental Crime and Corruption on “Strengthening the UNCAC to confront environmental crime and the climate crisis”, <https://uncaccoalition.org/wp-content/uploads/Strengthening-the-UNCAC-to-confront-environmental-crime-and-the-climate-crisis-Working-Group-on-Environmental-Crime-and-Corruption-CoSP11-Written-Submission-November-2025.pdf>.

⁹ Wildlife Justice Commission, *Convergence of wildlife crime with other forms of organized crime: A 2023 Review*, 2023, <https://wildlifejustice.org/publications/convergence-wildlife-crime-with-organised-crime-review-2023/>.

¹⁰ UNCAC Coalition, “Building momentum towards strong action at UNCAC CoSP11 to tackle the interlinkages between corruption, environmental crime and climate”, 2025, <https://uncaccoalition.org/building-momentum->

- Make better use of UNCAC provisions at the national level to combat corruption that affects the environment and contributes to climate change, including through public procurement integrity, transparency, and accountability, beneficial ownership transparency, anti-money laundering measures, and effective enforcement and international cooperation.¹¹
- Formally recognize the interlinkages between corruption, crimes that affect the environment, and climate change when adopting legislation and policies to address environmental crimes and climate change mitigation.
- Enhance traceability, transparency, and accountability to prevent and counter corruption in the management, allocation, and use of climate finance and in climate finance reporting.¹²

3) Political Finance

The financing of political parties and electoral campaigns provides ample opportunity for corruption, which in turn poses a serious threat to democracy, undermines electoral integrity, and skews justice for all citizens, in particular the most vulnerable groups, in favor of powerful actors with narrow, private interests.¹³ Besides, illicit and/or opaque political funding is often linked with other forms of corruption and undermines the fairness, integrity, and credibility of elections and of governments.

On the contrary, transparency and accountability of political finance strengthen the integrity of democratic institutions and elections and help deter conflicts of interest, state capture, and corruption in public office.¹⁴ Therefore, States Parties to the UNCAC should issue guidelines to give full effect to article 7.3 of the UNCAC, and in particular:

- Address transparency and accountability in political financing, promoting equal opportunity and encouraging wide participation in political processes.

[towards-strong-action-at-uncac-cosp11-to-tackle-the-interlinkages-between-corruption-environmental-crime-and-climate/](#).

¹¹ UNCAC Coalition. Statement submitted to the Implementation Review Group First resumed Sixteenth Session. Vienna, 2025.

<https://track.unodc.org/uploads/documents/UNCAC/WorkingGroups/ImplementationReviewGroup/16-20June2025/CAC-COSP-IRG-2025-NGO-6.pdf>.

¹² Submission on the “Baku to Belém Roadmap to 1.3T” submitted by the UNCAC Coalition Working Group on Environmental Crime and Corruption, 2025.

https://unfccc.int/sites/default/files/resource/UNCAC_Coalition_ECC_WG_Baku_to_Bel%C3%A9m_Roadmap_to_1.3T.pdf.

¹³ Transparency International. “Transparency of the Funding of Candidates and Political Parties: Written Submission to the 10th UNCAC Conference of States Parties (CoSP)”, 2023.

<https://files.transparencycdn.org/images/UNCAC-CoSP10-Political-Finance.pdf>.

¹⁴ Ibid.

- Provide adequate standards and adopt regulations to close the loopholes that enable illicit funding of political parties and elections.
- Mandate the reporting of donors, including the identity of persons providing funding, and the amounts donated to appropriate authorities and increase transparency over donations.
- Establish limits for donations, ban donations from anonymous and foreign sources and from companies that do not disclose their beneficial owners.
- Improve oversight and accountability of political finance regimes.
- Promote knowledge, civic engagement and public participation over political financing.

4) Human Rights and Corruption¹⁵

Corruption fosters an environment where human rights violations become more prevalent and systemic.¹⁶ Corruption directly undermines the enjoyment of human rights, impacting the right to equality and non-discrimination, access to essential services such as education, healthcare, and housing, and depriving the State of the resources needed to fulfil its obligations. It erodes good governance and weakens democratic institutions and undermines the transparency and accountability mechanisms essential for protecting human rights, especially impacting the most vulnerable and marginalized people and groups.

Therefore, it is crucial to deepen our understanding of states' human rights obligations in addressing corruption to effectively ensure and uphold human rights, to strengthen global efforts to combat and redress corruption's negative effects on the enjoyment of human rights. States should:

- Implement proactive, rights-focused measures, ensuring that anti-corruption initiatives not only address legal violations but also promote the common good, equity and safeguard fundamental freedoms.

¹⁵ See two other submissions to CoSP11 made by the Coalition's Working Group on Human Rights and Corruption: "Recommendations for Integrating Human Rights into Anti-Corruption Frameworks", <https://uncaccoalition.org/wp-content/uploads/Recommendations-for-Integrating-Human-Rights-into-Anti-Corruption-Frameworks-Working-Group-on-Human-Rights-and-Corruption-CoSP11-Written-Submission-November-2025.pdf>; and "Promoting Policy Coherence Through the Systemic Integration of International Human Rights Law", <https://uncaccoalition.org/wp-content/uploads/Promoting-Policy-Coherence-Through-the-Systemic-Integration-of-International-Human-Rights-Law-Working-Group-on-Gender-Inclusion-and-Corruption-Written-Submission-to-CoSP11-November-2025.pdf>.

¹⁶ See UNCAC Coalition's "Open letter to the Human Rights Council calling for a leap forward in addressing the negative impact of corruption on the enjoyment of human rights" to the Human Rights Council, 2025. <https://uncaccoalition.org/corruption-and-human-rights-an-open-letter-to-the-human-rights-council/>.

- Formally recognize that safeguarding human rights domestically is central to the fight against corruption at all levels.
- Ensure policy coherence and coordination at the UN level, among the UN bodies that are guardians of international human rights and anti-corruption obligations, on corruption and its impact on the enjoyment of human rights, and take account of resolution A/HRC/59/L.6 adopted by the Human Rights Council (HRC) and the comprehensive study it mandates the HRC Advisory Committee to prepare which it develops concrete guidelines on implementing existing procedural and substantive human rights obligations of States in the context of preventing and combating corruption.¹⁷

5) Access to Information

The right to access information held by State bodies is crucial for civil society organizations, the media, academia, and citizens to understand government decision-making and who influences it, to monitor the use of public funds, and to identify potential corruption risks and cases. The UNCAC explicitly recognizes access to information as a key tool in preventing and combating corruption, as well as enabling civil society participation to combat corruption. While it addresses public reporting and access to information specifically in articles 9, 10 and 13, as a prerequisite for civil society participation, it is a principle embedded in the Convention. However, we are experiencing a decline across all regions in implementing States' commitments on public access to information, with legal stagnation and increasing difficulties to access information in practice. The UNODC Secretariat's thematic report on implementation of chapter II (Preventive measures) of the UNCAC highlighted that most States received recommendations to adopt, reform, or more effectively implement their legal frameworks.¹⁸ Therefore, it is imperative that States:

- Adopt and implement strong access-to-information laws aligned with international standards and ensure effective and prompt access to information in practice by proactively disclosing information held by public bodies linked to preventing corruption, and by ensuring response to information requests.

¹⁷ United Nations Human Rights Council. *The negative impact of corruption on the enjoyment of human rights*. Resolution A/HRC/59/L.6, 2025. <https://docs.un.org/en/A/HRC/59/L.6>.

¹⁸ 65% of States reviewed (in the second UNCAC review cycle, focused on prevention) have relevant access to information legislation in place. Yet, 60% received recommendations to adopt, reform, or more effectively implement their legal frameworks.

See UNODC, *Implementation of chapter II (Preventive measures) of the United Nations Convention against Corruption. Thematic report prepared by the Secretariat, CAC/COSP/IRG/2025/*, submitted to the Implementation Review Group - First resumed sixteenth session, 2025.

<https://track.unodc.org/uploads/documents/UNCAC/WorkingGroups/ImplementationReviewGroup/16-20June2025/CAC-COSP-IRG-2025-7/2505693E.pdf>.

- Establish independent oversight bodies and clear sanctions against obstructions of access to information.
- Protect good-faith disclosures and whistleblowers.
- Use digital tools to proactively publish official data in reusable formats.
- Ensure inclusion by making information available for disadvantaged groups (e.g., people with disabilities, low literacy).

6) Civic Space¹⁹

Civil society has a crucial role to play in preventing and combating corruption. However, investigative journalists, whistleblowers, activists and other civil society actors face increasing risks in carrying out anti-corruption work as civic space shrinks across the globe, and opportunities for participation in anti-corruption efforts are reduced.²⁰ States should decisively protect civic space and promote civil society participation by:

- Providing a safe and enabling environment for civil society actors and ensuring that the conditions are present for them to operate independently and without fear of reprisal in their efforts to combat corruption and promote transparency and accountability.
- States must fully implement UNCAC Article 13; meaningful participation must be institutionalized through structured consultations and access to decision-makers and decision-making processes.
- Additionally, States should develop and support early warning and protection mechanisms to help those actors who face reprisals for their anti-corruption work and strengthen coordination among donors and international organizations to defend non-governmental stakeholders coming under attack.

¹⁹ See another written submission to CoSP11: UNCAC Coalition, “Protecting and promoting civic society participation in anti-corruption: Fulfilling the spirit and intent of UNCAC Article 13”, <https://uncaccoalition.org/wp-content/uploads/Protecting-and-promoting-civic-society-participation-in-anti-corruption—CoSP11-submission—Global-Civil-Society-Coalition-for-the-UNCAC—November-2025.pdf>.

²⁰ United Nations Office of the High Commissioner for Human Rights (OHCHR), “Joint Statement by a Group of Special Procedures Mandate Holders: Civic Space Must Be Protected and Expanded in Anti-Corruption Efforts—Urging States Parties to the UN Convention against Corruption (UNCAC) to Strengthen the Inclusiveness and Transparency of the Convention’s Review Mechanism”, 2025. <https://www.ohchr.org/sites/default/files/statements/20250822-stm-uncac-cop-sr-assembly.pdf>.