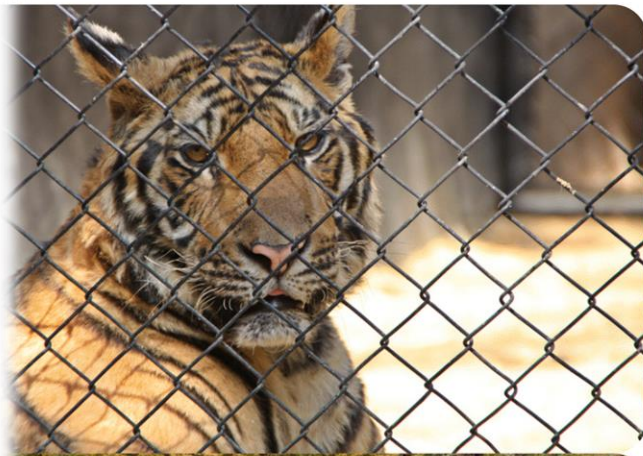




UNCAC Coalition's Working Group on Environmental Crime and Corruption

Breaking the silos: combating corruption and environmental crime to advance climate protection goals

Discussion Paper
November 2024



The UNCAC Coalition's Working Group on Environmental Crime and Corruption seeks to raise awareness among policy makers about the nexus between environmental crime and corruption, and its harmful impact on the environment, the climate, and human rights. The Working Group also promotes the adoption and effective implementation of robust policies and other measures by States to effectively prevent and combat these issues. The Working Group consists of over 230 civil society members worldwide and is chaired by the Wildlife Justice Commission.

We would like to thank members of the Working Group on Environmental Crime and Corruption and other experts who have contributed to this paper.

Table of Contents

Introduction	3
How environmental crime and corruption contribute to the climate crisis	4
Stronger action needed at global fora	7
Recommendations to ensure effective climate action	8
1) Integrate measures to combat corruption as part of the UNFCCC’s mitigation and adaptation goals	8
2) Strengthen cooperation and coordination between the UNCAC, UNFCCC, and UNTOC to advance climate action.....	9
3) Strengthen and effectively implement the UNCAC and UNTOC at the national level to combat corruption and crimes that affect the environment to advance climate action	10
4) Create a safe and enabling environment at the country level to provide the conditions for civil society actors to operate freely from threats, harassment, intimidation, and violence in their efforts to combat the nexus between environmental crime and corruption, and its impacts on the environment and climate.....	12
5) Promote the active and meaningful participation of civil society actors to ensure effective climate responses	13

Introduction

This discussion paper aims to provide a foundation to facilitate discussions on interlinkages between corruption, environmental crime and climate degradation to inform future actions in multilateral fora, in particular at the 11th UN Convention against Corruption Conference of the States Parties (UNCAC CoSP) and the 30th UN Framework Convention on Climate Change Conference of the Parties (UNFCCC COP) that will both take place in 2025. It will also be relevant for consideration in the follow-up actions to be undertaken by policymakers following the 12th UN Convention against Transnational Organized Crime Conference of the Parties (UNTOC COP), held in October this year.¹

Corruption is a major driver of climate change and biodiversity loss, with far-reaching impacts on people and the planet. Bribery, embezzlement, state capture, conflicts of interest, and other forms of corruption directly undermine the integrity and efficacy of climate protection goals to reduce greenhouse gas emissions. Corruption also enables crimes, including environmental crimes, that are major contributors to climate change, negatively impacting human rights and the achievement of the Sustainable Development Goals. Organized criminal networks undertaking environmental crimes often heavily rely on corruption at every step of the global supply chain, facilitating all aspects of their business models.

With world leaders gathering at COP29 to decide on further actions to tackle the climate crisis, the UNCAC Coalition's Working Group on Environmental Crime and Corruption urges governments to take strong measures to tackle the interlinkages between corruption, environmental crime, and climate change.

Now more than ever, strong action is needed to combat climate change. The UN Intergovernmental Panel on Climate Change (IPCC) urgently calls for the reduction of greenhouse gas emissions by at least 43% within the next decade to avoid further climate extremes, food crises, and loss of nature.² The World Meteorological Organization (WMO) reports that 2024 is

¹ Resolution L.9 on "*Enhancing measures to prevent and combat crimes that affect the environment falling within the scope of the United Nations Convention against Transnational Organized Crime*" was adopted at UNTOC COP12 in October 2024. This Resolution calls for the establishment of an "open-ended intergovernmental expert group on crimes that affect the environment" mandated to take stock of the application and implementation of the UNTOC, identify any gaps that may exist in the international legal framework and that could be addressed under the Convention, and consider possible responses to address these gaps, including possibly through any additional protocol to the UNTOC: [v2407289.pdf](#).

² Stiell, Simon (2023), "The New U.N. Climate Report on How to Course Correct", <https://time.com/6264659/lessons-from-the-new-u-n-climate-report-on-how-to-course-correct/>; UN

on track to be the hottest year on record and that 2015-2024 will be the warmest decade on record, stating that “extreme weather and climate events lead to massive economic and human losses”.³

With the need to mobilize significant resources to achieve climate protection goals, it is crucial to address a significant challenge: the lack of collaboration and coordination between the relevant UN conventions responsible for preventing corruption and organized crime and the various climate fora. Due to the global scope and interconnectivity of these issues, international and cross-sectoral cooperation and coordination between the UN Framework on Climate Change Convention (UNFCCC), the UN Convention against Corruption (UNCAC),⁴ and the UN Convention against Transnational Organized Crime (UNTOC)⁵ fora are urgently needed.

How environmental crime and corruption contribute to the climate crisis

Corruption enables a wide range of crimes that breach environmental protection laws and cause significant harm to the environment, the climate, and people, undermining human rights, the rule of law, public health, and security.⁶ These environmental crimes include illegal wildlife trade, Illegal Unreported and Unregulated fishing (IUU fishing), illegal logging, illegal mining, and waste

Intergovernmental Panel on Climate (IPCC) (2023), “AR6 Synthesis Report: Climate Change 2023”, <https://www.ipcc.ch/report/ar6/syr/>.

³ World Meteorological Organization (WMO) (2024), “2024 is on track to be hottest year on record as warming temporarily hits 1.5°C”, <https://wmo.int/news/media-centre/2024-track-be-hottest-year-record-warming-temporarily-hits-15degc>; WMO (2024), “Climate change indicators reached record levels in 2023: WMO”, <https://wmo.int/news/media-centre/climate-change-indicators-reached-record-levels-2023-wmo>.

⁴ The UNCAC is the only legally binding, universal anti-corruption instrument that covers a wide range of measures, including preventive measures, criminalization and law enforcement, international cooperation, asset recovery, technical assistance and information exchange; 191 states are parties to the UNCAC.

⁵ The UNTOC is an international treaty aimed at combating transnational organized crime, consisting of the main treaty and three additional protocols; 192 states are parties to the UNTOC.

⁶ WWF and UNODC (2022), “Crimes that Affect the Environment and Climate Change”, https://files.worldwildlife.org/wwfmsprod/files/Publication/file/8mie6esklg_Crimes_that_Affect_the_Environment_and_Climate_Change.pdf; UNODC (2023), “The Drugs-Crime Nexus in the Amazon Basin”, https://www.unodc.org/res/WDR-2023/Research_Brief_Amazon_FINAL.pdf; UN General Assembly, “Report of the Special Rapporteur on the issue of human rights obligations relating to the enjoyment of a safe, clean, healthy and sustainable environment, David R. Boyd”, <https://documents.un.org/doc/undoc/gen/n20/184/48/pdf/n2018448.pdf>. See para 26: “Efforts to protect nature are undermined by prioritizing economic growth, trade and corporate profits over environmental protection and addressing weaknesses in the rule of law (e.g., corruption and weak institutions), poverty, armed conflict, limited civic space, the criminalization of human rights defenders and the failure to recognize the rights of indigenous peoples and local communities.”

trafficking and pollution. Environmental crime and corruption⁷ contribute to ecosystem degradation, biodiversity decline, and loss of habitats for fauna and flora and accelerate climate change, making protecting the earth's climate stability much harder.⁸

There is growing recognition that environmental crime often constitutes serious organized crime⁹ and that the large-scale and transnational nature of organized criminal networks relies on protection and extortion rackets, money laundering, and corruption to engage in multiple criminal activities.¹⁰ As an example, illegal mining contributes to deforestation across the Amazon, Southeast Asia, and the Congo Basin, and converges with other crimes, including other environmental crimes, corruption, bribery, extortion and organized criminal activity.¹¹ Corruption in the forestry sector has been identified as a major concern in multiple IPCC reports, while “effective and inclusive governance” is highlighted as important to successful adaptation

⁷ For the purposes of this paper, environmental crime and corruption is defined as corruption that facilitates crimes that harm the environment, which may include (but is not limited to), the involvement of organized criminal networks. The UNTOC applies to offenses and serious crime as detailed in its Article 3 (“Scope of Application”), where the offense is transnational in nature and involves an organized criminal group. An “organized criminal group” is defined as “a group of three or more persons, existing for a period of time and acting in concert with the aim of committing one or more serious crimes or offences established in accordance with this Convention, in order to obtain, directly or indirectly, a financial or other material benefit” (Article 2 (a) UNTOC) and “serious crime” as “conduct constituting an offence punishable by a maximum deprivation of liberty of at least four years or a more serious penalty” (Article 2 (b) UNTOC).

⁸ WWF and UNODC (2022), “Crimes that Affect the Environment and Climate Change”, [https://files.worldwildlife.org/wwfcmsprod/files/Publication/file/8mie6esklg_Crimes that Affect the Environment and Climate Change.pdf](https://files.worldwildlife.org/wwfcmsprod/files/Publication/file/8mie6esklg_Crimes%20that%20Affect%20the%20Environment%20and%20Climate%20Change.pdf).

⁹ Environmental crime is now the third largest criminal sector worldwide, GITOC, INTERPOL, RHIPTO (2018), “World Atlas of Illicit Flows”, <https://globalinitiative.net/wp-content/uploads/2018/09/Atlas-Illicit-Flows-FINAL-WEB-VERSION-copia-compressed.pdf>, also UNTOC Resolution 10/6, https://www.unodc.org/documents/treaties/UNTOC/COP/SESSION_10/Resolutions/Resolution_10_6_-_English.pdf.

¹⁰ UNODC (2023), “Chapter 4: The nexus between drugs and crimes that affect the environment and convergent crime in the Amazon Basin”, *World Drug Report 2023*, https://www.unodc.org/res/WDR-2023/WDR23_B3_CH4_Amazon.pdf. For wildlife crime: Wildlife Justice Commission (2023), “Dirty Money: The Role of Corruption in Enabling Wildlife Crime”, <https://wildlifejustice.org/wp-content/uploads/2023/07/corruption-report-2023-SPREADS-V12.pdf>; Wildlife Justice Commission (2021), “Convergence of wildlife crime with other forms of organised crime”, [Crime-Convergence-Report-SPREADS-V07.pdf](https://wildlifejustice.org/wp-content/uploads/2024/02/Crime-Convergence-Report-SPREADS-V07.pdf), as well as its “2023 review”, <https://wildlifejustice.org/wp-content/uploads/2024/02/Crime-Convergence-Report-2023-SPREADS-V07-1.pdf>.

¹¹ WWF-UK and Themis (2024), “Financial Crimes and Land Conversion: Uncovering Risk for Financial Institutions”, pp. 47-48, <https://www.wwf.org.uk/sites/default/files/2024-04/WWF-UK-Financial-Crimes-and-Land-Conversion-Uncovering-Risk-for-Financial-Institutions.pdf>; FACT Coalition (2024), “Money Laundering from Environmental Crime: Typologies and Trends in Countries in the Amazon Region”, <https://thefactcoalition.org/wp-content/uploads/2024/10/Enviro-Crime-Typologies.pdf>.

efforts.¹² Climate change is also contributing to natural resource scarcity, making natural resource extraction and its lucrative revenues more appealing to organized criminal interests.¹³

Many forms of corruption can undermine the effectiveness of climate finance projects in achieving mitigation and adaptation goals, including bribery, embezzlement, money laundering, conflicts of interest, undue influence, nepotism, corruption in procurement processes, and secrecy of the beneficial owners of corporate vehicles to conceal the proceeds of corruption and other crimes.¹⁴ For example, bribery, opaque licensing and contract procedures, conflicts of interest, inadequate community consultation, and other factors pose significant risks in renewable energy projects.¹⁵ Corruption in the construction and infrastructure sectors can lead to faulty design, the use of substandard materials, and inadequate maintenance.¹⁶ Criminal networks engage in the natural resource and renewable energy sectors, exploiting the loopholes and weak oversight pervasive in many countries.

Corruption risks can also emerge in delivering multilateral and bilateral climate funds; risks include favoritism, embezzlement, bribery, and influence peddling. In addition, the lack of transparency in fund allocation and management, limited access to climate finance data, and insufficient accountability of accredited agencies, along with a lack of inclusive participation in these projects, can further exacerbate these corruption risks.¹⁷

¹² IPCC (2022), “Climate Change 2022: Mitigation of Climate Change”, https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC_AR6_WGIII_FullReport.pdf; IPCC (2022), “Climate Change 2022: Impacts, Adaptation and Vulnerability: Working Group II Contribution to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change”, p. 389 as example of reference to “effective and inclusive governance”, https://www.ipcc.ch/report/ar6/wg2/downloads/report/IPCC_AR6_WGII_FullReport.pdf.

¹³ Europol (2022), “Environmental crime in the age of climate change”, https://www.europol.europa.eu/cms/sites/default/files/documents/Environmental%20Crime%20in%20the%20Age%20of%20Climate%20Change%20-%20Public%20report_4.pdf.

¹⁴ Transparency International’s Climate Atlas of “climate corruption” that documents 80 cases across the globe, [Climate & Corruption Case Atlas - Transparency.org](https://www.transparency.org/en/climate-corruption), also FACT Coalition (2023), “Dirty Money and the Destruction of the Amazon”, <https://thefactcoalition.org/report/dirty-money-and-the-destruction-of-the-amazon-uncovering-the-us-role-in-illicit-financial-flows-from-environmental-crimes/>.

¹⁵ Basel Institute on Governance (2024), “Good governance and the just transition: Implications for renewable energy companies”, <https://baselgovernance.org/sites/default/files/2024-09/WP53.pdf>; U4 Helpdesk (2023), “Land corruption risks in the green energy sector”, <https://www.u4.no/publications/land-corruption-risks-in-the-green-energy-sector>.

¹⁶ IPCC (2022), “Climate Change 2022: Impacts, Adaptation and Vulnerability: Working Group II Contribution to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change”, p. 980, https://www.ipcc.ch/report/ar6/wg2/downloads/report/IPCC_AR6_WGII_FullReport.pdf. This report also highlights that “Corruption and misuse of climate finance is exacerbated by limited public access to information, political considerations in finance decision making and lack of accountability for decisions and actions”.

¹⁷ Transparency International Madagascar (2023), “Analyse des risques de corruption dans le secteur de la gouvernance climatique et des mécanismes de financement climatique à Madagascar (Analysis of Corruption Risks in the Climate Governance Sector and Climate Finance Mechanisms in Madagascar)”,

Stronger action needed at global fora

While the UN and other multilateral fora have increasingly recognized the need to combat corruption that facilitates crimes that affect the environment, the linkages to climate change have received far less attention. In 2019, the UNCAC's Conference of the States Parties (CoSP) adopted Resolution 8/12 to prevent and combat corruption as it relates to crimes that affect the environment, affirming that the UNCAC constitutes an effective tool and an important part of the legal framework for preventing and combating corruption enabling such crimes and for strengthening international cooperation.¹⁸ The UNTOC has passed several resolutions recognizing the need to prevent and combat corruption as an enabler of environmental crimes, most recently at COP12 in October 2024 adopting the Resolution to "Enhance measures to prevent and combat crimes that affect the environment falling within the scope of the UNTOC".¹⁹ The UN Human Rights Council (UNHRC) and the UN General Assembly have recognized the human right to a safe, clean, healthy, and sustainable environment.²⁰

<https://www.transparency.mg/telechargements/analyse-des-risques-de-corruption-dans-le-secteur-de-la-gouvernance-climatique/>; Office of the High Commissioner for Human Rights (2024), "Access to information vital for effective climate action and human rights protection", [Access to information vital for effective climate action and human rights protection | OHCHR](#), "Information on national budgets and international finance for fighting against climate change, as well as subsidies to fossil fuels and other high-emitting activities, should also be published".

¹⁸ Most recently, UNCAC CoSP10 Resolution 10/2 includes an operative paragraph: "Urges small island developing States to strengthen and effectively implement anti-corruption frameworks as part of the steps taken to enhance good governance and the rule of law in the area of ocean and land resources management, including in climate change adaptation and mitigation activities...",

https://www.unodc.org/documents/treaties/UNCAC/COSP/session10/resolutions/L-documents/2325138E_L.6_Rev.1.pdf; also see UNCAC CoSP10 Resolution 10/5 on "Measures to addressing corruption involving organized criminal groups", https://www.unodc.org/documents/treaties/UNCAC/COSP/session10/resolutions/L-documents/2325374E_L.9_Rev.1.pdf.

¹⁹ UNTOC COP resolutions on crimes that affect the environment: Resolution L.9, <https://documents.un.org/doc/undoc/ltd/v24/072/89/pdf/v2407289.pdf>; Resolution 11/3, https://www.unodc.org/documents/treaties/UNTOC/COP/Session_11/Resolutions/English/Resolution_11_3.pdf; Resolution 10/6, https://www.unodc.org/documents/treaties/UNTOC/COP/SESSION_10/Resolutions/Resolution_10_6_-_English.pdf.

²⁰ Human Rights Council (HRC) (2021), Resolution on "The human right to a clean, healthy and sustainable environment", <https://digitallibrary.un.org/record/3945636?ln=en&v=pdf>; HRC Resolution 10/4 on "Human rights and climate change", https://ap.ohchr.org/documents/E/HRC/resolutions/A_HRC_RES_10_4.pdf.

Recommendations to ensure effective climate action

Effective climate action urgently requires a robust international and cross-sectoral approach to address corruption and the environmental crime it facilitates. Governments must bolster the implementation of the UNFCCC, UNCAC, UNTOC, and other multilateral fora, in a complementary and coordinated manner, to ensure effective climate responses. We call on governments and global fora to take the following actions:²¹

1) Integrate measures to combat corruption as part of the UNFCCC's mitigation and adaptation goals:

- **Adopt anti-corruption standards to safeguard the integrity of the COPs and civil society protection and participation.**²² The adoption of clear standards is urgently needed to address corporate undue influence, greenwashing by corporate and government interests, and other governance challenges that seriously undermine the effectiveness and credibility of COPs, as starkly shown at COP29.²³
- **Adopt a standing agenda item at the UNFCCC COPs to discuss and address integrity challenges to help achieve mitigation and adaptation goals.** Develop a structured process and work program for receiving inputs from intergovernmental organizations as well as non-state actors, such as civil society organizations and experts on anti-corruption

²¹ For additional recommendations: UNODC and World Bank (2024), "Addressing Corruption Risks to Safeguard the Response to Climate Change: Discussion Draft II",

https://track.unodc.org/uploads/documents/corruption/Publications/2024/Addressing_Corruption_Risks_to_Safeguard_the_Response_to_Climate_Change_Discussion_Draft_II.pdf; "Open Letter to UNCAC States Parties Calling for a Strong Resolution at CoSP10 to Prevent and Combat Environmental Crime and Corruption" (2023), signed by 301 civil society organizations and experts from 99 countries, <https://uncaccoalition.org/wp-content/uploads/Open-letter-for-CoSP10-on-environmental-crime-and-corruption.pdf>; and UNCAC Coalition's Working Group on Environmental Crime and Corruption (2023), "Strengthening the UNCAC to combat environmental crime and corruption", <https://uncaccoalition.org/wp-content/uploads/ECC-Working-Group-Submission-to-the-CoSP10.pdf>.

²² Freedom House (2024), Remarks for delivery at COP29, <https://freedomhouse.org/article/cop29-remarks-prepared-delivery-nicole-bibbins-sedaca>.

²³ "Open Letter on COP reform to All States that are Parties to the Convention" (November 2024) from 22 world climate leaders with recommendations for reforming the COP, including strict eligibility criteria for COP hosts to "exclude countries who do not support the phase out/transition away from fossil energy", improving implementation and accountability, and enhancing equitable representation, <https://www.clubofrome.org/cop-reform-2024/>. Transparency International has put forward a proposal and recommendations to strengthen integrity, accountability and transparency for the COP, including for selection of the COP host, for COP preparations and hosting arrangements, for COP participation and for ensuring responsible engagement of the private sector: Transparency International (2024), "COP Co-Opted? How Corruption and Undue Influence Threaten Climate Action", https://images.transparencycdn.org/images/COP-CO-OPTED-How-Corruption-and-Undue-Influence-Threaten-Multilateral-Climate-Action_FINAL.pdf. Also see Global Witness (2024), "COP29 is for oil deals", <https://www.globalwitness.org/en/campaigns/fossil-gas/cop-is-for-oil-deals/>.

and crime issues, to develop guidance on how the COP can address these issues and ways to work with other initiatives and fora to address integrity issues.²⁴

- **Promote good governance and anti-corruption measures in the proper management and use of climate finance funds** and other finance mechanisms to protect the environment and climate and biological diversity.²⁵
- **Integrate anti-corruption assessments into Nationally Defined Contributions (NDCs) and national climate strategies to mainstream anti-corruption considerations from the outset of climate planning.** Subnational and municipal governments should be involved in developing and implementing the NDCs, which can be vulnerable to corruption.²⁶ As part of the Paris Agreement’s Enhanced Transparency Framework, countries should report on efforts to foster transparency, accountability, and integrity and to mitigate corruption and crime risks in their mitigation and adaptation programs.^{27,28}
- **Integrate corruption and crimes that affect the environment, including crimes that fall within the scope of the UNTOC, into consideration in IPCC assessments.** The IPCC should examine corruption as a threat multiplier for climate change and factor crimes into their socioeconomic pathways, working with the UNCAC and UNTOC Secretariats, Working Groups, relevant experts, and stakeholders to develop the assessment.

2) Strengthen cooperation and coordination between the UNCAC, UNFCCC, and UNTOC to advance climate action:

- **Adopt resolutions, decisions, and other outputs,** to formally recognize and mainstream the links between corruption, crime, and climate change and the need for action by governments to tackle them.²⁹

²⁴ Minas, Stephen (2024), “The contribution of the Conference of the Parties to a supranational anti-corruption ecosystem”, available at SSRN: <https://ssrn.com/abstract=>.

²⁵ The Open letter from world climate leaders released at COP29 , includes a recommendation to ensure robust tracking of climate financing, calling for “standardised definitions and criteria for what qualifies as climate finance, along with common reporting frameworks and tracking mechanisms to verify climate financing flows”: <https://www.clubofrome.org/cop-reform-2024/>; C20 Working Group 3 Policy Brief on Environment, Climate Justice and Just Energy Transition (para 2 on Climate Finance): [C20-WG3-Environment-Climate-Justice-and-Just-Energy-Transition Policy-Brief final.pdf](https://www.clubofrome.org/wp-content/uploads/2024/07/C20-WG3-Environment-Climate-Justice-and-Just-Energy-Transition-Policy-Brief-final.pdf).

²⁶ The next round of NDCs will be due in early 2025. U4 (2022), “Integrating corruption considerations into Nationally Determined Contributions”, <https://www.u4.no/publications/integrating-corruption-considerations-into-nationally-determined-contributions-ndc>.

²⁷ Countries can voluntarily report on how they are addressing these issues, helping this become an established practice.

²⁸ UNODC (2024), “Integrating crimes that affect the environment in national climate action”, [CAE Climate Action](https://www.unodc.org/en/news/press-releases/2024/07/0724-integrating-crimes-that-affect-the-environment-in-national-climate-action).

²⁹ Other relevant fora and bodies include the Commission on Crime Prevention and Criminal Justice (CCCPJ), Convention on International Trade in Endangered Species of Wild Flora and Fauna (CITES), Financial Action Task Force (FATF), UN Convention on Biological Diversity (CBD), UN Environment Assembly (UNEA), UN Human Rights Council (HRC), UN General Assembly (UNGA), UN Environment Programme (UNEP), UN Development Programme (UNDP), World Bank and other international financial institutions.

- **Establish mechanisms for cooperation, coordination, and joint activities** between these conventions to advance climate action, with the conferences of these conventions giving clear mandates for a coordinated and integrated approach to tackle the interlinkages. This should include the development of specific areas of collaboration, coordination, and joint activities between the secretariats and subsidiary bodies and working groups across the three fora to advance climate action.³⁰
- **Develop comprehensive policy development and technical assistance, training, capacity building, guidance, and good practices** for how countries should apply and fully utilize the UNCAC, UNTOC, and other relevant international agreements to advance climate protection goals and ensure the proper use and management of climate finance funds³¹, developing partnerships between the implementing agencies of these three fora in developing and promoting these resources.

3) Strengthen and effectively implement the UNCAC and UNTOC at the national level to combat corruption and crimes that affect the environment to advance climate action:

- **Strengthen transparency, integrity, and accountability for awarding, granting, and managing contracts, concessions, permits and licenses** in the natural resource sector, notably by creating public, central beneficial ownership registers that include adequate, accurate, and up-to-date data that is freely accessible and can be used by relevant stakeholders, as well as accountability frameworks, including conflicts of interest policies, political financing rules, and lobbying transparency.³²
- **Ensure that government agencies, including law enforcement and financial intelligence units, have adequate authority, independence, resources, and capacity**

³⁰ Such cooperation should extend to the regional and national levels - for example, the UN Office of Drugs and Crimes (UNODC), the secretariat for the UNCAC and UNTOC, has regional anti-corruption hubs which should collaborate and coordinate with the UNFCCC's Regional Collaboration Centres, to integrate anti-corruption safeguards in efforts to implement NDCs.

³¹ Combating corruption risks in climate finance should be addressed as part of a broader effort to mainstream anti-corruption throughout the Financing for Development Agenda; UNCAC Coalition (2024), Submission for the Elements Paper "Mainstreaming Anti-Corruption throughout the FfD4 Agenda", <https://financing.desa.un.org/sites/default/files/2024-11/FfD4%20-%20UNCAC%20Coalition%20submission%20for%20the%20Elements%20Paper%20-%202015%20Oct%202024.pdf>.

³² UNCAC CoSP Resolution 10/9 on "Promoting transparency and integrity in public procurement in support of the 2030 Agenda for Sustainable Development", https://www.unodc.org/documents/treaties/UNCAC/COSP/session10/resolutions/L-documents/2325383E_L.13_Rev.1.pdf; and CoSP Resolution 10/6 on "Enhancing the use of beneficial ownership information to strengthen asset recovery", https://www.unodc.org/documents/treaties/UNCAC/COSP/session10/resolutions/L-documents/2325375E_L.10_Rev.1.pdf.

- to effectively prevent and combat corruption and crimes that affect the environment and climate and provide dissuasive sanctions in cases of non-compliance.³³
- **Prevent and combat the mismanagement and misappropriation of funds invested in the public and private sectors to achieve mitigation and adaptation goals and promote the transition to a green economy.** Effectively implement the relevant provisions of the UNCAC as well as other important and relevant agreements including the Financial Action Task Force (FATF) and the Organization for Economic Cooperation and Development (OECD) Anti-Bribery Convention, to prevent bribery, embezzlement, and anti-money laundering related to the management and use of the significant amount of funds needed for climate solutions.
 - **Bolster the use of parallel provisions in the UNCAC and UNTOC to combat corruption and crimes that affect the environment, including joint investigations and special investigative techniques.**³⁴ Promote international cooperation and intersectoral cooperation (with law enforcement, anti-corruption authorities, financial intelligence units, environmental protection agencies, and other relevant government bodies) to ensure that corruption and crime risks, as well as illicit financial flows, are addressed in parallel and in a coordinated manner.
 - **Fully utilize and strengthen the review mechanisms of the UNCAC, UNTOC, and other relevant monitoring mechanisms** to increase the effectiveness of these conventions on the ground in combating corruption and transnational organized crimes that affect the environment to protect the climate.³⁵
 - **Employ UNCAC Articles 34, 35, and 53.b to use funds recovered from sanctions resulting from corruption and fraud in climate mitigation and adaptation projects to**

³³ UN General Assembly, “Report of the Special Rapporteur on the issue of human rights obligations relating to the enjoyment of a safe, clean, healthy and sustainable environment, David R. Boyd”, <https://documents.un.org/doc/undoc/gen/n20/184/48/pdf/n2018448.pdf>. This report recommends to “Strengthen the environmental rule of law by reducing and eliminating corruption, strengthening institutions, building knowledge and implementation capacity, ensuring judicial independence” (para 90 (b)).

³⁴ As an example of parallel provisions: Articles 49 and 50 of the UNCAC and Articles 19 and 20 of the UNTOC can help identify, disrupt, and dismantle criminal groups involved in environmental crimes and tackle the corruption that is fueling those crimes.

³⁵ Stronger provisions are needed to ensure meaningful civil society participation, greater transparency and structured follow-up processes in the UNCAC review mechanism to strengthen anti-corruption frameworks and their implementation to tackle corruption and crimes that harm the climate; UNCAC Coalition (2024), “Discussion Paper: Key Recommendations to make the IRM more effective in strengthening UNCAC implementation”, <https://uncaccoalition.org/key-recommendations-to-make-the-irm-more-effective-in-strengthening-uncac-implementation/>. The UNTOC review mechanism faces similar challenges as outlined in Global Initiative against Transnational Organized Crime (2024) “Is the UNTOC Working?”, https://globalinitiative.net/wp-content/uploads/2024/10/Is-the-UNTOC-working_-An-assessment-of-the-implementation-and-impact-of-the-Palermo-Convention-GI-TOC-October-2024.v3.pdf.

compensate the communities and victims that have suffered from these flawed projects.³⁶

4) Create a safe and enabling environment at the country level to provide the conditions for civil society actors to operate freely from threats, harassment, intimidation, and violence in their efforts to combat the nexus between environmental crime and corruption, and its impacts on the environment and climate:

- **Establish and effectively implement enabling legal frameworks for environmental human rights defenders, activists, whistleblowers, journalists, academics, non-governmental organizations, community-based organizations, and other civil society actors.**³⁷ National legal frameworks should include protection laws consistent with international human rights standards and ensure that civil society actors' work is not criminalized or stigmatized. Frameworks should also include comprehensive access to information laws that are effectively implemented, and the granting of independent NGOs' legal standing to represent the public interest. A coordinated approach is needed to provide sustained support for civil society actors coming under attack, including programs for protection, early warning, and monitoring threats against civil society. Protection measures must also apply to government employees, such as park rangers who work to protect natural resources and can face significant risks from corruption, intimidation, and violence.³⁸

³⁶ Felipe Freitas Falconi, José Ugaz, Juanita Olaya Garcia, Yara Esquivel Soto (2023), Victims of Corruption Back for Payback, Stolen Recovery Initiative, https://star.worldbank.org/sites/default/files/2023-11/Victims-report-05_0.pdf; Written submission: The UNCAC Coalition Working Groups on Victims of Corruption, on Asset Recovery, on Grand Corruption and State Capture, and on Gender Inclusion & Corruption (2023), Consequences of Corruption: The Right of Victims to Participation and Reparation in Corruption Cases Submission, <https://uncaccoalition.org/joint-working-group-submission-on-victims-reparation/>.

The UNCAC Coalition's Working Group on Victims of Corruption has established a Database on Corruption Damage Reparation and Legal Standing for Victims of Corruption, <https://uncaccoalition.org/get-involved/working-groups/victims-of-corruption-working-group/database-on-legal-standing/>.

³⁷ UN General Assembly (2021), "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", <https://documents.un.org/doc/undoc/gen/g21/396/47/pdf/g2139647.pdf>; IUCN Commission on Environmental, Economic and Social Policy (2021), "Special Issue on Environmental Defenders - Volume III: Conservation and the need for greater defenders protection", <https://portals.iucn.org/library/sites/library/files/documents/Policy-Matters-Issue-22-vol3.pdf>; C20 Working Group 3 Policy Brief on Environment, Climate Justice and Just Energy Transition (para 5 on Climate Justice and Environmental Human Rights Defenders), [C20 -WG3-Environment-Climate-Justice-and-Just-Energy-Transition_Policy-Brief_final.pdf](https://www.c20.org/working-groups/3-policy-brief-on-environment-climate-justice-and-just-energy-transition-policy-brief-final.pdf).

³⁸ Rademeyer, Julian (2023), "Landscape of Fear: Crime, corruption and murder in greater Kruger", Research paper, Issue 36, ENACT, <https://enact-africa.s3.amazonaws.com/site/uploads/paper-36.pdf>.

- **Legally require and effectively implement robust protection and reporting mechanisms for whistleblowers**³⁹ from the public and private sectors who report corruption linked to environmental and climate offenses, providing secure and anonymous reporting channels and protecting whistleblowers from retaliation for refusing to violate the law.⁴⁰
- **Implement a rights-based approach of Free, Prior, and Informed Consent (FPIC) to obtain consent and approval of communities and Indigenous Peoples** before initiating projects that affect their environment and actively involve them in the development, implementation, and monitoring of climate finance projects.⁴¹

5) Promote the active and meaningful participation of civil society actors to ensure effective climate responses:

- **Support civil society actors in developing country parallel reports** that identify gaps in addressing corruption and crime as mitigation and adaptation barriers and propose technical assistance and capacity building, policy development and implementation, monitoring, and other types of assistance as an outcome. These reports should be officially recognized and considered by the UNFCCC process.⁴²
- **Increase support for and collaboration with civil society organizations (CSOs) and multi-stakeholder initiatives (MSIs) to prevent and combat corruption and crimes that affect the environment, including transnational organized crime, to advance climate action.** Multilateral fora, UN bodies, and governments should promote and foster meaningful participatory approaches to effectively involve civil society actors and citizens in the decision-making, design, implementation, and monitoring of climate projects to increase the effectiveness of interventions.⁴³ MSIs can reinforce and build upon what UN conventions and other global fora aim to achieve, and in some cases can go further than

³⁹ Government Accountability Project and International Bar Association (2021), “Are whistleblowing laws working? A global study of whistleblower protection litigation”, <https://www.ibanet.org/MediaHandler?id=49c9b08d-4328-4797-a2f7-1e0a71d0da55>; UNODC (2015), “Resource Guide on Good Practices in the Protection of Reporting Persons”, https://www.unodc.org/documents/corruption/Publications/2015/15-04741_Person_Guide_eBook.pdf.

⁴⁰ Consistent with UNCAC Articles 32 and 33 and UNTOC Article 24, also UNCAC CoSP Resolution 10/8 on “Protection of reporting persons”, https://www.unodc.org/documents/treaties/UNCAC/COSP/session10/resolutions/L-documents/2325382E_L.12_Rev.1.pdf.

⁴¹ The Convention on Biological Diversity COP16 (2024) adopted a [Historic decision at COP16 as Indigenous Peoples and local communities gain a permanent space in biodiversity policy](#). Also: AP News (November 2024), “Agreement to give Indigenous groups voice on nature conservation decisions”, <https://apnews.com/article/biodiversity-cop16-colombia-decisions-indigenous-53a8b16befaf621d75a2fc9b9828c2a8>.

⁴² Civil society actors can produce such reports as is done for the UNCAC, where CSOs prepare parallel reports that evaluate UNCAC implementation and put forward recommendations to address gaps and challenges: <https://uncaccoalition.org/uncac-review/cso-review-reports>.

⁴³ As an example, the World Resources Institute has developed principles for locally-led adaptation: <https://www.wri.org/initiatives/locally-led-adaptation/principles-locally-led-adaptation>.

UN conventions in getting faster results in developing, advancing, and delivering on commitments and in promoting accountability.⁴⁴

- **Enhance the provision of technical assistance to prevent and combat corruption and crimes that affect the environment by partnering with CSOs** that can play a key role in mentoring and training those in charge of prosecuting and adjudicating such crimes, and strengthening legislative and policy frameworks to combat them. CSOs can also play a key role in facilitating innovative platforms and advanced technology to support such efforts and help increase transparency of technical assistance efforts.
- **Provide free and widespread access to Earth observation satellite data of land use and environmental change** and other relevant data to ensure its availability to Indigenous Peoples, communities, and other non-state actors.⁴⁵ The widespread availability of such data will help enable effective monitoring and oversight efforts by civil society actors, which have a crucial role in holding governments and the private sector accountable for meeting climate protection commitments.

⁴⁴ Specific MSIs that are relevant to addressing the interlinkages between corruption, environmental crime and climate change include but are not limited to the [Extractive Industries Transparency Initiative](#), the [Nature Crime Alliance](#) and the [Open Government Partnership](#).

⁴⁵ As an example: <https://earth.esa.int/eogateway/data-application/satellite-data-boosts-global-understanding-of-land-surface>.