

Anti-Corruption Priorities in Europe and Call to Action

Global Civil Society Coalition for the UNCAC¹
Regional Submission to CoSP11

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As we approach the 11th Session of the Conference of the States Parties to the UNCAC (CoSP11), civil society organizations across Europe² urge States Parties to the Convention to take bold and sustained action to combat corruption – a systemic and persistent threat to democratic institutions, human rights, and public trust in our countries. In this joint statement, we highlight anti-corruption priorities for the region and provide recommendations, emphasizing the inclusion of civil society in anti-corruption efforts.

Regional context

With the world standing at a critical juncture, European countries confront growing systemic risks linked to political financing, foreign influence, and powerful structures that escape public accountability and regulatory frameworks. According to a Eurobarometer survey from July 2025,³ over two-thirds of European Union (EU)'s citizens consider corruption to be widespread, particularly among political parties. High-profile corruption scandals expose risks at the intersection of public procurement, lobbying, and political financing. In some countries, corruption also affects the judiciary and other sectors and areas, including environmental governance. Rising cases of 'state capture' show how narrow interests hijack policy and institutions at the expense of the public good. Additionally, links between criminal networks and a collusion of public and private actors illustrate "strategic corruption" – the deliberate use of corruption to destabilize and erode legitimate institutions abroad.⁴

Despite existing commitments, the implementation of the UNCAC is far from achieved in Europe. The EU anti-corruption framework has yet to be updated, with the promised directive on combating corruption through criminal law and an EU-wide harmonized sanctions regime for corruption still

¹ Has been known as the UNCAC Coalition.

² Special thanks goes to the following civil society organizations within our network: Institute for Democracy "Societas Civilis" - Skopje (IDSCS), Transparency International Russia, Partners for Democratic Change – Serbia, Open Contracting Partnership, Transparency International, Center for Civil Communications, Center for the Study of Democracy (CSD), European Policy Centre / Centar za evropske politike (CEP), Partners Albania for Change and Development, ALTAX Center, Centre for Security Studies, Uzbek Forum for Human Rights, X-Net, Journalists for Human Rights, Tilman Hoppe, Transparency International France, Observatório de Economia e Gestão de Fraude (OBEGEF), Transparência e Integridade (TI Portugal), Institute of Public Finance, Transparency International Ireland, David Banisar, Transparency International Deutschland.

³ European Union, "Citizens' attitudes towards corruption in the EU in 2025". Available at: <https://europa.eu/eurobarometer/surveys/detail/3361>.

⁴ Basel Institute on Governance (February 2025), Quick Guide on Strategic Corruption. Available at: <https://baselgovernance.org/sites/default/files/2025-02/QG37-Strategic%20corruption.pdf>.

pending.⁵ Relevant laws are in place, but their application is weak and selective. Consequently, most Europeans view government efforts to tackle corruption as ineffective.⁶ Critical systemic flaws include:

- Inadequate mechanisms to prevent conflicts of interest and ensure transparency and integrity in managing public resources;
- Weak and politically-dependent anti-corruption and oversight institutions;
- Safe havens, and under-regulated corporate service providers fuel opaque, transnational networks to launder the proceeds of corruption.

In addition to these flaws, civic space is shrinking due to democratic backsliding. Civil society actors and journalists are essential allies in identifying risks, exposing wrongdoing, and co-creating resilient governance structures. However, across the region, we witness an increasingly challenging environment for civil society. Media freedom is under pressure by political and corporate interests, and different strategies are used to silence dissent and suppress independent watchdogs through repressive regulations, restrictions on access to funding, smear campaigns or judicial harassment.

Further, access to information remains difficult across the region. The first binding treaty on access to official documents from the Council of Europe (CoE), the Tromsø Convention,⁷ entered into force in 2020, but has only been ratified by 17 countries. According to international ratings, some of the best Right to Information laws can be found in the region,⁸ but this has not guaranteed the right to access information to reveal and fight corruption in practice.⁹ The EU and CoE have both promoted whistleblower protection but whistleblowers rarely receive adequate protection and face reprisals, even in countries that have implemented the EU Whistleblower Directive.¹⁰ In addition, participation of local communities in policymaking and oversight remains largely symbolic. These obstacles to civil society engagement hinder the legitimacy and impact of government-led anti-corruption efforts. That is why high expectations rest on the new EU Civil Society Strategy, now in development, to support, protect, and empower civil society as a pillar of democracy.

Recommendations for priority actions

⁵ European Commission, webpage on “EU legislation on anti-corruption”. Available at: https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/democracy-eu-citizenship-anti-corruption/anti-corruption/eu-legislation-anti-corruption_en.

⁶ European Union, “Citizens’ attitudes towards corruption in the EU in 2025”. Available at: <https://europa.eu/eurobarometer/surveys/detail/3361>.

⁷ Council of Europe, “The Council of Europe Convention on Access to Official Documents” (Tromsø Convention). Available at: <https://www.coe.int/en/web/access-to-official-documents>.

⁸ Global Right to Information Rating (RTI Rating), website: <https://www.rti-rating.org/>.

⁹ Council of Europe (September 2025), “Thematic paper Access to Information. Group of States against Corruption (GRECO). Overview of GRECO’s findings under the Fifth Evaluation Round”. Available at: <https://rm.coe.int/access-to-information-thematic-paper-final-for-publication-en-230625/4880289dcb>.

¹⁰ European Parliament and Council of the European Union, Directive (EU) 2019/1937 of 23 October 2019 on the protection of persons who report breaches of Union law. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019L1937>.

UNCAC States Parties in Europe must show political commitment to uphold the Convention, in letter and in spirit. We urge governments to prioritize and advance concrete reforms to:

1. Ensure transparency, integrity and accountability in the management of public resources

- Strengthen integrity in public administration at national and local levels, including state-owned enterprises;
- Take an open-by-default approach in public procurement and management of public budgets; use digital tools and clear accessible language. Implement open contracting data standards, e-procurement systems, and cross-border interoperability of databases. Revise the European Union's public procurement Directives to harness the power of data analytics, aligning with CoSP Resolution 10/9;¹¹
- Ensure transparency in the use of international development funds, particularly on infrastructure and climate-related projects;
- Implement risk-based oversight in sectors vulnerable to corruption, especially in public procurement and concessions, and strategic investments.

2. Empower oversight institutions and guarantee the independence of the judiciary

- Reinforce the supervisory role of parliaments;
- Strengthen the independence, resources and capacity of the judiciary and of anti-corruption institutions, including the Public Prosecutor and Supreme Audit Institutions, by ensuring transparent appointments, adequate mandate and resources, and protection from political interference;
- Improve the interoperability of systems and datasets between public entities involved in anti-corruption prevention and sanctioning, and facilitate inter-agency cooperation;
- Strengthen transparency and engage civil society in monitoring compliance in critical areas such as environmental governance, extractive industries, and digital infrastructure;

¹¹ United Nations Office on Drugs and Crime (UNODC), Resolutions and decisions adopted by the Conference of the States Parties to the United Nations Convention against Corruption at its Tenth Session: Resolution 10/9, "Promoting transparency and integrity in public procurement in support of the 2030 Agenda for Sustainable Development". Available at: <https://www.unodc.org/corruption/en/cosp/conference/session10-resolutions.html#Res.10-9>.

- Ensure compliance with international obligations, including the Aarhus Convention on access to environmental information¹², the Convention on the Elimination of All Forms of Discrimination Against Women¹³, and Sustainable Development Goal 16¹⁴;
- Implement the recommendations from UNCAC reviews and GRECO evaluations¹⁵ consistently.

3. Ensure integrity in public service and dismantle corrupt networks

- Harmonize and strengthen political financing rules to tighten controls on parties and campaign funding, increase transparency of indirect funding channels, and enforce sanctions for non-compliance;
- Encourage ethical conduct and professional standards in public office;
- Improve the detection and prevention of conflicts of interest, including by collecting, verifying, and publishing asset and interest declarations of a wide range of public officials, and applying sanctions for non-compliance;
- Facilitate the international exchange of data for the verification of asset declarations to enable checks on unexplained wealth, including through considering ratification of the International Treaty on Exchange of Data for the Verification of Asset Declarations;¹⁶
- Strengthen lobbying regulation and transparency, and revolving door policies;
- Proactively address high-level and political corruption to dismantle networks that seek to dominate public contracts and erode institutional independence;
- Improve inter-institutional and transnational cooperation and joint investigations to tackle illicit flows that use European financial systems and vehicles for money laundering. Prosecute financial crime and increase penalties for foreign bribery and cross-border corruption;
- Address the links between corruption and organized crime, and “strategic corruption” across Europe.¹⁷

4. Proactively recover and return stolen assets

¹² United Nations (1998) , Convention on access to information, public participation in decision-making and access to justice in environmental matters (Aarhus Convention). Available at: <https://unece.org/environment-policy/public-participation/aarhus-convention/text>.

¹³ United Nations (1979), Convention on the Elimination of All Forms of Discrimination against Women. Available at: <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-elimination-all-forms-discrimination-against-women>.

¹⁴ United Nations, “Sustainable Development Goal 16”. Available at: <https://sdgs.un.org/goals/goal16>.

¹⁵ Council of Europe, Group of States against Corruption (GRECO), “Evaluations”. Available at: <https://www.coe.int/en/web/greco/evaluations>.

¹⁶ Regional Anti-Corruption Initiative (RAI), The International Treaty for the Verification of Asset Declarations, conference room paper, CAC/COSP/2021/CRP.7, 9 December 2021. Available at: https://www.unodc.org/documents/treaties/UNCAC/COSP/session9/CAC-COSP-2021-CRP.7_E.pdf.

¹⁷ Europol, EU Serious and Organised Crime Threat Assessment 2025 (pp. 28–29). Available at: <https://www.europol.europa.eu/cms/sites/default/files/documents/EU-SOCTA-2025.pdf>.

- Support regional cooperation for the recovery of assets, including by sharing data on assets and interests of politically exposed persons;
- Guarantee transparency and accountability in asset return, following the principles of responsible and accountable asset return endorsed by the Global Forum on Asset Recovery (GFAR)¹⁸;
- Revise EU Directive 2024/1260 on Asset Recovery and Confiscation¹⁹ to ensure that asset repatriation is transparent, participatory, and victims-centered, including collective victims of large-scale corruption;
- Put in place safeguards to ensure repatriated assets do not risk being misappropriated by corrupt networks, and ensure that funds are allocated transparently, with the meaningful participation of civil society.

5. Ensure safe conditions for civic space, inclusion, and social engagement

- Fully implement Article 13 of UNCAC by institutionalizing civil society participation in anti-corruption planning, monitoring and reporting;
- Establish formal mechanisms for public participation in law and rulemaking, budgeting, and oversight of public resources;
- Facilitate stable resources to independent civil society organizations and media;
- Protect civic space and implement the Council of Europe's Recommendation on countering SLAPPs and the EU Anti-SLAPP Directive;²⁰
- Establish strong whistleblower reporting and protection mechanisms, in line with CoSP Resolution 10/8.²¹ Provide secure digital channels and comprehensive support to whistleblowers through legal, physical and psychological assistance;
- Cooperate with UN Special Rapporteurs and regional mechanisms to monitor threats against journalists and human rights defenders;

¹⁸ Global Forum on Asset Recovery (GFAR) (2017). GFAR Principles for Disposition and Transfer of Confiscated Stolen Assets in Corruption Cases. Available at: <https://star.worldbank.org/sites/star/files/the-gfar-principles.pdf>.

¹⁹ European Parliament and Council of the European Union. Directive (EU) 2024/1260 of 24 April 2024 on asset recovery and confiscation. Available at: <https://eur-lex.europa.eu/eli/dir/2024/1260/oj/eng>.

²⁰ Council of Europe, Recommendation CM/Rec(2024)2 of the Committee of Ministers to member States on countering the use of strategic lawsuits against public participation (SLAPPs), adopted 5 April 2024. Available at: <https://rm.coe.int/0900001680af2805>; European Parliament and Council of the European Union, Directive (EU) 2024/1069 of 11 April 2024 on protecting persons who engage in public participation from manifestly unfounded or abusive court proceedings ("strategic lawsuits against public participation"). Official Journal L, 17 April 2024. Available at: <https://eur-lex.europa.eu/eli/dir/2024/1069/oj/eng>.

²¹ United Nations Office on Drugs and Crime (UNODC), Resolutions and decisions adopted by the Conference of the States Parties to the United Nations Convention against Corruption at its Tenth Session: Resolution 10/8, "Protection of reporting persons", 2023. Available at: <https://www.unodc.org/corruption/en/cosp/conference/session10-resolutions.html#Res.10-8>.

- Foster a democratic political culture through educational campaigns; empower young people to actively participate in anti-corruption efforts by supporting youth-led accountability initiatives and participatory monitoring;
- Collect and publish disaggregated data on the social impacts of corruption, implementing Resolution 10/10;²²
- Mainstream gender in anti-corruption strategies and address the unequal access to justice. Train institutions to address gender-specific corruption (e.g., sexual corruption);
- Promote open data and access to information of key registries (company registers, beneficial ownership register, public procurement database, land records);
- Publish local data on public spending, environmental licenses, and development projects, and engage civil society and media in monitoring contracts and service delivery;
- Guarantee public information and meaningful participation of civil society in UNCAC implementation reviews and follow-up of review recommendations in each country.²³

Fighting corruption is essential to achieving sustainable development, as reaffirmed by UN Member States at the 4th International Conference on Financing for Development.²⁴ Corruption in Europe erodes governance and public trust, while weakening the capacity and credibility of European countries to lead global anti-corruption and development efforts. The Coalition network in Europe stands ready to collaborate with governments to tackle corruption decisively.

²² United Nations Office on Drugs and Crime (UNODC), Resolutions and decisions adopted by the Conference of the States Parties to the United Nations Convention against Corruption at its Tenth Session: Resolution 10/10, “Addressing the societal impacts of corruption”, 2023. Available at:

<https://www.unodc.org/corruption/en/cosp/conference/session10-resolutions.html#Res.10-10>.

²³ UNCAC Coalition’s “Open Letter: Enhancing Anti-Corruption Efforts Globally by Adopting a More Effective, Transparent, and Inclusive UNCAC Review Mechanism” (Updated 5 August 2025). Available at:

https://uncaccoalition.org/open_letter_irm/.

²⁴ United Nations, General Assembly, Sevilla Commitment: Draft resolution submitted by the President of the General Assembly (A/79/L.-1), 17 July 2025. Available at:

<https://digitallibrary.un.org/record/4085602?ln=es&v=pdf#files>.