

# Our calls to action: An overview of our recommendations and submissions

Global Civil Society Coalition for the UNCAC<sup>1</sup> Submission to CoSP11

#### **21 November 2025**

The Coalition represents more than 400 organizations, working to strengthen the implementation of the UN Convention against Corruption (UNCAC) and elevate anti-corruption standards and practices globally.

This submission provides an overview of the contributions and priority issues our global community brings to the Conference.

Our global community identified the following priorities for States Parties at CoSP11:<sup>2</sup>

- 1) Adopt a transparent, inclusive, effective and efficient UNCAC IRM in its next phase.
- Recognize the interlinkages between corruption, crimes that affect the environment, and climate change; enhance transparency and anti-corruption safeguards in climate finance.
- 3) Elevate transparency and accountability in political finance.
- 4) Integrate human rights obligations into anti-corruption efforts.
- 5) **Strengthen access to information frameworks** in law and practice.
- 6) Protect civic space by ensuring safe conditions for civil society actors, institutionalizing meaningful participation in line with Article 13 and strengthening protection mechanisms.

As negotiations of the **UNCAC Implementation Review Mechanism's (IRM) next phase** enter their final stage, we urge States to adopt a more effective, efficient, transparent, and inclusive IRM.<sup>3</sup> This call is supported by 513 organizations, entities, and experts from 125 countries.<sup>4</sup> The

https://uncaccoalition.org/wp-content/uploads/Anti-corruption-priorities-from-the-Global-Civil-Society-Coalition-for-the-UNCAC-%E2%80%93-CoSP11-submission-%E2%80%93-Global-Civil-Society-Coalition-for-the-UNCAC-%E2%80%93-November-2025.pdf.

<sup>&</sup>lt;sup>1</sup> Has been known as the UNCAC Coalition.

<sup>&</sup>lt;sup>2</sup> See: "Anti-corruption priorities from the Global Civil Society Coalition for the UNCAC",

<sup>&</sup>lt;sup>3</sup> "Key recommendations for strengthening the next phase of the Implementation Review Mechanism of the UNCAC", <a href="https://uncaccoalition.org/wp-content/uploads/Key-recommendations-to-strengthen-the-UNCAC-IRM-next-phase-%E2%80%93-CoSP11-submission-%E2%80%93-Global-Civil-Society-Coalition-for-the-UNCAC-%E2%80%93-November-2025.pdf.

<sup>&</sup>lt;sup>4</sup> "Open Letter: Enhancing Anti-Corruption Efforts Globally by Adopting a More Effective, Transparent, and Inclusive UNCAC Review Mechanism", <a href="https://uncaccoalition.org/open letter irm/">https://uncaccoalition.org/open letter irm/</a>.



resolution should establish a clear and relevant follow-up process, and lay out a plan for implementation and a timeframe for when country reviews should begin (no later than 2027).

The following aspects should be the bare minimum of any agreement:

- Addressing new developments.
- Reviewing the effectiveness of implementation.
- Encouraging States to enhance engagement with non-governmental stakeholders in key stages of the review, including by providing details on entry points.
- Allowing reviewing States to solicit information provided by non-governmental stakeholders.
- Requesting States to publish the full country report.
- Publishing updated information on country review timelines and focal points.
- Publishing progress reports after the country review, following a template.

In a dedicated submission, we assess the status of UNCAC reviews globally, outline good practices of and challenges to meaningful, transparent, and inclusive civil society participation in the IRM, and present the findings and impact of our tools:<sup>5</sup>

- 1. Our **UNCAC Review Status Tracker**<sup>6</sup> shows that many reviews remain opaque, with little to no up-to-date information available. We provide statistics on where reviews stand, how long they take, and how many review documents are published.
- 2. 42 out of 192 States Parties have signed the **Transparency Pledge**<sup>7</sup> a commitment to higher standards of transparency and civil society participation. Welcoming improving compliance with the Pledge, we call on States who have not done so yet to sign it.
- 3. The Coalition's **Guide to Transparency and Participation in the UNCAC Implementation Review Mechanism**<sup>8</sup> provides a roadmap for States Parties and civil society on best practice examples at different stages of the review process and follow-up.
- 4. Through our **Access to Information Campaign**,<sup>9</sup> we support CSOs in requesting the release of crucial UNCAC review documents from their governments.

The Coalition has supported **national civil society organizations in producing over 50 parallel reports**, assessing national UNCAC implementation of Chapters II (prevention) and V (asset

<sup>&</sup>lt;sup>5</sup> "Meaningful, transparent and inclusive UNCAC implementation reviews", <a href="https://uncaccoalition.org/wp-content/uploads/Meaningful-transparent-and-inclusive-UNCAC-reviews-%E2%80%93-CoSP11-submission-%E2%80%93-Global-Civil-Society-Coalition-for-the-UNCAC-%E2%80%93-November-2025.pdf.</a>

<sup>&</sup>lt;sup>6</sup> UNCAC Coalition, "UNCAC Review Status Tracker", <a href="https://uncaccoalition.org/uncacreviewstatustracker/">https://uncaccoalition.org/uncacreviewstatustracker/</a>.

<sup>&</sup>lt;sup>7</sup> UNCAC Coalition, "Transparency Pledge", <a href="https://uncaccoalition.org/uncac-review/transparency-pledge/">https://uncaccoalition.org/uncac-review/transparency-pledge/</a>.

<sup>&</sup>lt;sup>8</sup> UNCAC Coalition, "Guide to Transparency and Participation in the UNCAC Implementation Review Mechanism", <a href="https://uncaccoalition.org/wp-content/uploads/UNCAC-Coalition-%E2%80%93-Guide-to-Transparency-and-Participation-in-the-IRM">https://uncaccoalition.org/wp-content/uploads/UNCAC-Coalition-%E2%80%93-Guide-to-Transparency-and-Participation-in-the-IRM</a> ESP.pdf.

<sup>&</sup>lt;sup>9</sup> UNCAC Coalition, "Access to Information Campaign", <a href="https://uncaccoalition.org/uncac-review/access-to-information-campaign/">https://uncaccoalition.org/uncac-review/access-to-information-campaign/</a>.



recovery), developing recommendations for priority actions, and contributing to national reviews and follow-up. We are submitting the summaries of parallel reports produced since CoSP10, covering <a href="Cameroon">Cameroon</a>10, <a href="Chad">Chad</a>11, <a href="Guatemala">Guatemala</a>12, <a href="Guinea">Guinea</a>13, <a href="Iraq">Iraq</a>14, <a href="Kenya">Kenya</a>, <a href="Mongolia">Mongolia</a>, <a href="Nigeria">Nigeria</a>, <a href="Rwanda">Rwanda</a>16, <a href="Sri Lanka">Sri Lanka</a>, <a href="Ukraine">Ukraine</a>, <a href="Venezuela">Venezuela</a>17, and <a href="Mozambique">Mozambique</a>.

### **Resolution follow-up**

We call on States Parties to **strengthen their follow-up to CoSP resolutions**. Our dedicated submission emphasizes the critical role of civil society in advocating for, monitoring, and contributing to national implementation. Since CoSP10, the Coalition's network has supported implementation efforts at global, regional, and national levels. We will expand this work after CoSP11 to help ensure that resolutions translate into stronger laws, policies, and practices. CoSP resolutions are effective only when they are fully implemented with meaningful civil society participation, enabling a genuine whole-of-society approach to combating corruption.<sup>18</sup>

#### Civic space

Civic space for anti-corruption activists is shrinking across all regions, both nationally and internationally, making it increasingly difficult for civil society to hold power to account or

<sup>&</sup>lt;sup>10</sup> For summary in French, see <a href="https://uncaccoalition.org/wp-content/uploads/Global-Civil-Society-Coalition-forthe-UNCAC-CoSP11-Submission-%E2%80%93-Cameroon-Civil-Society-Parallel-Report-Executive-Summary-French.pdf">https://uncaccoalition.org/wp-content/uploads/Global-Civil-Society-Coalition-forthe-UNCAC-CoSP11-Submission-%E2%80%93-Cameroon-Civil-Society-Parallel-Report-Executive-Summary-French.pdf</a>.

<sup>&</sup>lt;sup>11</sup> For summary in French, see <a href="https://uncaccoalition.org/wp-content/uploads/Global-Civil-Society-Coalition-for-the-UNCAC-CoSP11-Submission-%E2%80%93-Chad-Civil-Society-Parallel-Report-%E2%80%93-Executive-Summary-French.pdf.rights,">https://uncaccoalition.org/wp-content/uploads/Global-Civil-Society-Coalition-for-the-UNCAC-CoSP11-Submission-%E2%80%93-Chad-Civil-Society-Parallel-Report-%E2%80%93-Executive-Summary-French.pdf.rights,</a>

<sup>&</sup>lt;sup>12</sup> For summary in Spanish, see <a href="https://uncaccoalition.org/wp-content/uploads/Global-Civil-Society-Coalition-for-the-UNCAC-CoSP11-Submission-%E2%80%93-Guatemala-Civil-Society-Parallel-Report-%E2%80%93-Executive-Summary-Spanish.pdf">https://uncaccoalition.org/wp-content/uploads/Global-Civil-Society-Coalition-for-the-UNCAC-CoSP11-Submission-%E2%80%93-Guatemala-Civil-Society-Parallel-Report-%E2%80%93-Executive-Summary-Spanish.pdf</a>.

<sup>&</sup>lt;sup>13</sup> For summary in French, see <a href="https://uncaccoalition.org/wp-content/uploads/Global-Civil-Society-Coalition-for-the-UNCAC-CoSP11-Submission-%E2%80%93-Guinea-Civil-Society-Parallel-Report-%E2%80%93-Executive-Summary-French.pdf">https://uncaccoalition.org/wp-content/uploads/Global-Civil-Society-Coalition-for-the-UNCAC-CoSP11-Submission-%E2%80%93-Guinea-Civil-Society-Parallel-Report-%E2%80%93-Executive-Summary-French.pdf</a>.

<sup>&</sup>lt;sup>14</sup> For summary in Arabic, see <a href="https://uncaccoalition.org/wp-content/uploads/Global-Civil-Society-Coalition-for-the-UNCAC-CoSP11-Submission-Iraq-Civil-Society-Parallel-Report-Executive-Summary-Arabic.pdartificialnationalnationalf">https://uncaccoalition.org/wp-content/uploads/Global-Civil-Society-Coalition-for-the-UNCAC-CoSP11-Submission-Iraq-Civil-Society-Parallel-Report-Executive-Summary-Arabic.pdartificialnationalnationalf</a>.

<sup>&</sup>lt;sup>15</sup> This reference to should be understood to be in the context of United Nations Security Council Resolution 1244 (1999).

<sup>&</sup>lt;sup>16</sup> For summary in French, see <a href="https://uncaccoalition.org/wp-content/uploads/Global-Civil-Society-Coalition-for-the-UNCAC-CoSP11-Submission-%E2%80%93-Rwanda-Civil-Society-Parallel-Report-%E2%80%93-Executive-Summary-French.pdf">https://uncaccoalition.org/wp-content/uploads/Global-Civil-Society-Coalition-for-the-UNCAC-CoSP11-Submission-%E2%80%93-Rwanda-Civil-Society-Parallel-Report-%E2%80%93-Executive-Summary-French.pdf</a>.

<sup>&</sup>lt;sup>17</sup> For summary in Spanish, see <a href="https://uncaccoalition.org/wp-content/uploads/Global-Civil-Society-Coalition-for-the-UNCAC-CoSP11-Submission-%E2%80%93-Venezuela-Civil-Society-Parallel-Report-Executive-Summary-Spanish.pdf">https://uncaccoalition.org/wp-content/uploads/Global-Civil-Society-Coalition-for-the-UNCAC-CoSP11-Submission-%E2%80%93-Venezuela-Civil-Society-Parallel-Report-Executive-Summary-Spanish.pdf</a>.

<sup>&</sup>lt;sup>18</sup> "Advancing anti-corruption through CoSP10 resolutions: Actions taken by civil society to promote implementation of CoSP10 resolutions", <a href="https://uncaccoalition.org/wp-content/uploads/CoSP10-resolution-implementation-%E2%80%93-CoSP11-submission-%E2%80%93-Global-Civil-Society-Coalition-for-the-UNCAC-%E2%80%93-November-2025.pdf">https://uncaccoalition.org/wp-content/uploads/CoSP10-resolution-implementation-%E2%80%93-CoSP11-submission-%E2%80%93-Global-Civil-Society-Coalition-for-the-UNCAC-%E2%80%93-November-2025.pdf</a>.



contribute meaningfully to anti-corruption efforts. We outline the challenges facing anti-corruption advocates, the restrictions occurring even within UNCAC fora, and the steps **States** must take to uphold their commitments and safeguard meaningful civil society participation.<sup>19</sup>

#### **Regional perspectives**

Dozens of CSOs contributed to our submissions, reflecting key regional priorities:

In **Asia-Pacific**, major challenges include restricted access to information, shrinking civic space, and limited participation in decision-making. Our community urges States to expand civic space, improve access to information, advance beneficial ownership transparency, strengthen integrity in procurement and political finance, and enhance the transparency and inclusivity of the UNCAC IRM.<sup>20</sup>

Across **Europe**, systemic flaws include weak conflict-of-interest controls, politically dependent oversight bodies, and under-regulated corporate service providers enabling illicit financial flows. The community calls on States to ensure transparent management of public resources, safeguard the independence of oversight institutions and the judiciary, dismantle corrupt networks, proactively recover stolen assets, and guarantee safe conditions for civil society.<sup>21</sup>

In Latin America and the Caribbean, corruption and impunity remain structural, exacerbated by restricted civic space, captured institutions, and attacks on fundamental rights. Key recommendations include protecting civic space, increasing transparency and access to information, safeguarding whistleblowers, regulating political finance, ensuring judicial independence, recognizing collective victims, and strengthening transparency in public contracting and beneficial ownership.<sup>22</sup>

In **Sub-Saharan Africa**, some progress has been made – such as new access-to-information and whistleblower laws and emerging beneficial ownership registers – but reforms lack adequate

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<sup>&</sup>lt;sup>19</sup> "Protecting and promoting civic society participation in anti-corruption: Fulfilling the spirit and intent of UNCAC Article 13", <a href="https://uncaccoalition.org/wp-content/uploads/Protecting-and-promoting-civic-society-participation-in-anti-corruption-%E2%80%93-CoSP11-submission-%E2%80%93-Global-Civil-Society-Coalition-for-the-UNCAC-%E2%80%93-November-2025.pdf.">https://uncaccoalition.org/wp-content/uploads/Protecting-and-promoting-civic-society-participation-in-anti-corruption-%E2%80%93-CoSP11-submission-%E2%80%93-Global-Civil-Society-Coalition-for-the-UNCAC-%E2%80%93-November-2025.pdf.</a>

<sup>&</sup>lt;sup>20</sup> "Anti-Corruption Priorities in Asia-Pacific", <a href="https://uncaccoalition.org/wp-content/uploads/Global-Civil-Society-Coalition-for-the-UNCAC-CoSP11-Submission-Asia-Pacific-Anti-Corruption-Priorities-November-2025.pdf">https://uncaccoalition.org/wp-content/uploads/Global-Civil-Society-Coalition-for-the-UNCAC-CoSP11-Submission-Asia-Pacific-Anti-Corruption-Priorities-November-2025.pdf</a>.

<sup>&</sup>lt;sup>21</sup> "Anti-Corruption Priorities in Europe and Call to Action", <a href="https://uncaccoalition.org/wp-content/uploads/Global-Civil-Society-Coalition-for-the-UNCAC-CoSP11-Submission-Europe-Anti-Corruption-Priorities-November-2025.pdf">https://uncaccoalition.org/wp-content/uploads/Global-Civil-Society-Coalition-for-the-UNCAC-CoSP11-Submission-Europe-Anti-Corruption-Priorities-November-2025.pdf</a>.

<sup>&</sup>lt;sup>22</sup> "Anti-Corruption Priorities for Latin America and the Caribbean", English: <a href="https://uncaccoalition.org/wp-content/uploads/Global-Civil-Society-Coalition-for-the-UNCAC-CoSP11-Submission-Latin-America-Anti-Corruption-Priorities-November-2025-English.pdf">https://uncaccoalition.org/wp-content/uploads/Global-Civil-Society-Coalition-for-the-UNCAC-CoSP11-Submission-Latin-America-Anti-Corruption-Priorities-November-2025-English.pdf</a>;

Spanish: <a href="https://uncaccoalition.org/wp-content/uploads/Global-Civil-Society-Coalition-for-the-UNCAC-CoSP11-Submission-Latin-America-Anti-Corruption-Priorities-November-2025-Spanish.pdf">https://uncaccoalition.org/wp-content/uploads/Global-Civil-Society-Coalition-for-the-UNCAC-CoSP11-Submission-Latin-America-Anti-Corruption-Priorities-November-2025-Spanish.pdf</a>.



resourcing and enforcement. States should counter shrinking civic space, protect whistleblowers, strengthen political finance oversight, adopt digital tools for transparent procurement, integrate gender-responsive measures, and reinforce the UNCAC IRM.<sup>23</sup>

In **Southwest Asia and North Africa**, civil society faces a severe sustainability crisis and restricted participation, limiting accountability efforts. Anti-corruption priorities include comprehensive access to information, open and accountable procurement, beneficial ownership transparency, political finance integrity, stronger governance of state-owned enterprises and public bodies, transparent asset recovery, climate and natural resource integrity, algorithmic accountability, meaningful civil society involvement, and a more transparent and inclusive UNCAC IRM.<sup>24</sup>

# Human rights and (anti-)corruption

Anti-corruption and human rights frameworks are mutually reinforcing. Both address structural drivers of injustice rooted in concentrated power, weak institutional checks, limited access to information, and systemic inequality.

In a dedicated submission, we call on States to systematically integrate human rights into anticorruption frameworks, mandates, monitoring, and enforcement. Internationally, treaty bodies, peer-review systems, and CoSP resolutions should operationalize cross-references to human rights obligations.<sup>25</sup>

A second submission highlights policy areas where human rights and anti-corruption measures can be better aligned at national and international levels, including institutional mandates, judicial integrity, civic space, and the use of artificial intelligence.<sup>26</sup>

French: <a href="https://uncaccoalition.org/wp-content/uploads/Global-Civil-Society-Coalition-for-the-UNCAC-CoSP11-Submission-Sub-Saharan-Africa-Anti-Corruption-Priorities-November-2025-French.pdf">https://uncaccoalition.org/wp-content/uploads/Global-Civil-Society-Coalition-for-the-UNCAC-CoSP11-Submission-Sub-Saharan-Africa-Anti-Corruption-Priorities-November-2025-French.pdf</a>.

Arabic: https://uncaccoalition.org/wp-content/uploads/Global-Civil-Society-Coalition-for-the-UNCAC-CoSP11-Submission-South-West-Asia-and-Northern-Africa-Anti-Corruption-Priorities-November-2025-Arabic.pdf.

<sup>&</sup>lt;sup>23</sup> "Anti-Corruption Priorities in Sub-Saharan Africa", English: <a href="https://uncaccoalition.org/wp-content/uploads/Global-Civil-Society-Coalition-for-the-UNCAC-CoSP11-Submission-Sub-Saharan-Africa-Anti-Corruption-Priorities-November-2025-English.pdf">https://uncaccoalition.org/wp-content/uploads/Global-Civil-Society-Coalition-for-the-UNCAC-CoSP11-Submission-Sub-Saharan-Africa-Anti-Corruption-Priorities-November-2025-English.pdf</a>;

<sup>&</sup>lt;sup>24</sup> "Anti-Corruption Priorities in the SWANA Region", English: <a href="https://uncaccoalition.org/wp-content/uploads/Global-Civil-Society-Coalition-for-the-UNCAC-CoSP11-Submission-South-West-Asia-and-Northern-Africa-Anti-Corruption-Priorities-November-2025-English.pdf;</a>

<sup>&</sup>lt;sup>25</sup> "Promoting Policy Coherence Through the Systemic Integration of International Human Rights Law", Submission by the Global Civil Society Coalition for the UNCAC's Working Group on Human Rights & Corruption and the Cyrus R. Vance Center for International Justice, <a href="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">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</a>.

<sup>&</sup>lt;sup>26</sup> "Recommendations for Integrating Human Rights into Anti-Corruption Frameworks", Submission by the Global Civil Society Coalition for the UNCAC's Working Group on Human Rights & Corruption, <a href="https://uncaccoalition.org/wp-content/uploads/Recommendations-for-Integrating-Human-Rights-into-Anti-">https://uncaccoalition.org/wp-content/uploads/Recommendations-for-Integrating-Human-Rights-into-Anti-</a>



#### **Gender and corruption**

Sexual corruption – using sex as a coerced "currency" for essential goods and services – occurs across many sectors and causes severe harm to victims. Resolution 10/10 marked the first global recognition of this issue, calling on States to raise awareness, close legal gaps, and strengthen prevention and enforcement. To advance these commitments, we urge States to adopt a clear definition of sexual corruption, collect disaggregated data, and seek UNODC technical guidance. Priorities include sector-specific risk assessments, targeted training, stronger institutional safeguards, legislative reforms that criminalize sexual corruption without penalizing victims, and trauma-informed reporting and support mechanisms.<sup>27</sup>

A second thematic submission offers good-practice guidance for gender-mainstreaming anticorruption efforts.<sup>28</sup> A third summarizes findings from 18 datasets on gender and corruption, highlighting the need for sex- and gender-disaggregated data, standardized methodologies, gender-sensitive reporting channels, and publicly accessible datasets to strengthen evidencebased policy.<sup>29</sup>

#### **Environmental crime and the climate crisis**

We call on States Parties to prioritize combating corruption that enables environmental crime and undermines environmental and climate action. At CoSP11, States should adopt a strong, dedicated resolution with concrete, time-bound commitments and adequate support for technical assistance and capacity-building, while integrating environmental and climate considerations across UNCAC processes.<sup>30</sup>

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<u>Corruption-Frameworks-Working-Group-on-Human-Rights-and-Corruption-CoSP11-Written-Submission-November-2025.pdf.</u>

<sup>&</sup>lt;sup>27</sup> "Advancing Resolution 10:10 by Addressing Sexual Corruption", Submission by the Global Civil Society Coalition for the UNCAC's Working Group on Gender, Inclusion and Corruption, <a href="https://uncaccoalition.org/wp-content/uploads/Advancing-Resolution-1010-by-Addressing-Sexual-Corruption-Working-Group-on-Gender-Inclusion-and-Corruption-Written-Submission-to-CoSP11-November-2025.pdf">https://uncaccoalition.org/wp-content/uploads/Advancing-Resolution-1010-by-Addressing-Sexual-Corruption-Working-Group-on-Gender-Inclusion-and-Corruption-Written-Submission-to-CoSP11-November-2025.pdf</a>.

<sup>&</sup>lt;sup>28</sup> "Gender Mainstreaming in Anti-Corruption Efforts", Submission by the Global Civil Society Coalition for the UNCAC's Working Group on Gender, Inclusion and Corruption, <a href="https://uncaccoalition.org/wp-content/uploads/Gender-Mainstreaming-in-Anti-Corruption-Efforts-Working-Group-on-Gender-Inclusion-and-Corruption-Written-Submission-to-CoSP11-November-2025.pdf">https://uncaccoalition.org/wp-content/uploads/Gender-Mainstreaming-in-Anti-Corruption-Efforts-Working-Group-on-Gender-Inclusion-and-Corruption-Written-Submission-to-CoSP11-November-2025.pdf</a>.

<sup>&</sup>lt;sup>29</sup> "Closing the Data Gap between Gender and Corruption", Submission by the Global Civil Society Coalition for the UNCAC's Working Group on Gender, Inclusion and Corruption , <a href="https://uncaccoalition.org/wp-content/uploads/Closing-the-Data-Gap-between-Gender-and-Corruption-Working-Group-on-Gender-Inclusion-and-Corruption-Written-Submission-to-CoSP11-November-2025.pdf">https://uncaccoalition.org/wp-content/uploads/Closing-the-Data-Gap-between-Gender-and-Corruption-Working-Group-on-Gender-Inclusion-and-Corruption-Written-Submission-to-CoSP11-November-2025.pdf</a>.

<sup>&</sup>lt;sup>30</sup> "Strengthening the UNCAC to Confront Environmental Crime and the Climate Crisis", Submission by the Global Civil Society Coalition for the UNCAC's Working Group on Environmental Crime and Corruption, <a href="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.</a>



#### Transparency in asset recovery

Despite international obligations, transparency in asset recovery remains limited. Data on frozen, confiscated, and returned assets is often incomplete or inaccessible, undermining accountability and limiting victims' engagement. In a dedicated submission, we urge States Parties to improve public access to data and methodologies, involve civil society in monitoring, ensure recovered assets benefit affected communities, and enhance international coordination for effective, victim-centered restitution.<sup>31</sup>

# Victims of corruption

Although corruption's collective harm is widely recognized, legal mechanisms for collective reparation remain underused in corruption cases. A dedicated submission shares findings from a mapping of 47 jurisdictions on standing and reparation for collective victims. Narrow definitions of victims of corruption continue to restrict access to justice, and examples of court-ordered collective reparation remain rare.<sup>32</sup>

#### Protection of journalists, their sources and defenders

Public-interest reporting actors are essential to exposing corruption, yet face increasing legal harassment, violence, online attacks, misuse of state resources, and disinformation campaigns. We call on States Parties to protect these actors and their sources from retaliation, combat SLAPPs, safeguard confidentiality and anonymity, address gender-based threats and online harassment, and strengthen international cooperation and capacity-building.<sup>33</sup>

https://uncaccoalition.org/wp-content/uploads/Protection-of-Journalists-their-Sources-and-Defenders-Working-Group-on-Protection-of-Whistleblowers-and-Other-Reporting-Persons-CoSP11-Written-Submission-November-2025.pdf.

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<sup>&</sup>lt;sup>31</sup> "Transparency in Asset Recovery", Submission by the Global Civil Society Coalition for the UNCAC's Working Group on Asset Recovery, <a href="https://uncaccoalition.org/wp-content/uploads/Transparency-in-Asset-Recovery-Working-Group-on-Asset-Recovery-CoSP11-Written-Submission-November-2025.pdf">https://uncaccoalition.org/wp-content/uploads/Transparency-in-Asset-Recovery-Working-Group-on-Asset-Recovery-CoSP11-Written-Submission-November-2025.pdf</a>.

<sup>32 &</sup>quot;Recognizing and Addressing Collective Harm for Victims of Corruption: Comparative Mapping and Pathways for Reparation", Submission by the Working Group on Victims of Corruption of the Global Civil Society Coalition for the UNCAC, <a href="https://uncaccoalition.org/wp-content/uploads/Recognizing-and-Addressing-Collective-Harm-for-Victims-of-Corruption-Working-Group-on-Victims-of-Corruption-CoSP11-Written-Submission-November-2025.pdf">https://uncaccoalition.org/wp-content/uploads/Recognizing-and-Addressing-Collective-Harm-for-Victims-of-Corruption-Working-Group-on-Victims-of-Corruption-CoSP11-Written-Submission-November-2025.pdf</a>. 33 "Protection of Journalists, their Sources and Defenders." Submission by the Working Group on the Protection of Whistleblowers and Other Reporting Persons of the Global Civil Society Coalition for the UNCAC,