

Strengthening the UNCAC to confront environmental crime and the climate crisis

Environmental Crime and Corruption Working Group of the Global Civil Society Coalition for the UNCAC to the 11th Session of the UNCAC Conference of States Parties

21 November 2025

The case for decisive action – A dedicated resolution

The [Environmental Crime and Corruption Working Group](#) of the Global Civil Society Coalition for the UNCAC, comprising over 230 civil society organizations (CSOs) globally, calls on State Parties to prioritize preventing and combating corruption that enables crimes that affect the environment (CAE) and undermines environment and climate action as a central focus of UNCAC implementation. We call on States to adopt a strong dedicated resolution at CoSP11 with concrete, time-bound commitments and adequate support for technical assistance and capacity-building, while integrating environmental and climate considerations across other UNCAC processes and resolutions.

Corruption is a major driver of climate change, pollution, and biodiversity loss, with far-reaching impacts on people and the planet.¹ It is also a key enabler of CAE, which significantly contribute to environmental degradation and undermine human rights, the rule of law, economic stability, security, and progress towards the Sustainable Development Goals.² CAE also exacerbate climate change by destroying vital carbon sinks, releasing greenhouse gases,

¹ Transparency International (TI), "Climate & corruption case atlas," Transparency International Climate Governance Integrity Programme, n.d. <https://www.transparency.org/en/projects/climate-governance-integrity-programme/climate-corruption-atlas> which includes 83 cases across the globe showcasing the impact of corruption on the climate; Global Atlas of Environmental Justice, n.d. <https://ejatlas.org/> which has documented over 4,300 socio-environmental conflicts worldwide, with close to 70 cases across the globe showcasing the impact of corruption on global warming; UNCAC Coalition's Working Group on Environmental Crime and Corruption. "Breaking the silos: combating corruption and environmental crime to advance climate protection goals," UNCAC Coalition and Wildlife Justice Commission (WJC), 2024. <https://uncaccoalition.org/breaking-the-silos-combating-corruption-and-environmental-crime-to-advance-climate-protection-goals>.

² United Nations Office on Drugs and Crime (UNODC). "Preventing and combating corruption as it relates to crimes that have an impact on the environment: an overview," United Nations, 2021. https://www.unodc.org/documents/treaties/UNCAC/COSP/session9/CAC-COSP-2021-CRP.8_E.pdf; Andre Francisco Pilon, "The Bubbles or the Boiling Water? Ways to regenerate the Earth and Humanity", Katoikos, 2025. <https://katoikos.world/analysis/the-bubbles-or-the-boiling-water-ways-to-regenerate-the-earth-and-humanity.html> which highlights that these crimes often thrive in contexts where weak governance and certain legally sanctioned but environmentally harmful practices further erode oversight and enforcement.

and undermining ecosystem resilience.³ Corruption facilitating CAE compromises efforts to mitigate and adapt to climate change effects.

Bribery, embezzlement, state capture, conflicts of interest, and other forms of corruption allow organized criminal networks to profit from CAE such as illegal logging, mining, fishing, wildlife and waste trafficking while evading detection, apprehension, and prosecution.⁴ Organized environmental crime is widely regarded as the third largest criminal sector in the world, generating hundreds of billions of dollars annually.⁵ With a global economic impact estimated at USD 1-2 trillion annually, this expanding criminal economy deprives states of substantial revenues essential for governance and development.⁶

Corruption further hinders the fair and effective use of resources earmarked for environmental protection and, increasingly, climate-related financing, preventing funds from reaching their intended purposes.⁷ The long-term environmental, social, and economic

³ UNODC and World Wildlife Fund (WWF). "Crimes that affect the environment and climate change," UNODC and WWF, 2022. [https://www.unodc.org/res/environment-climate/resources/html/Crimes that Affect the Environment and Climate Change.pdf](https://www.unodc.org/res/environment-climate/resources/html/Crimes%20that%20Affect%20the%20Environment%20and%20Climate%20Change.pdf).

⁴ David Aled Williams, "Transnational environmental crime and corruption," in *Research Handbook on Environmental Crimes and Criminal Enforcement*, edited by S. L. Smith and L. Sahramaki, (Edward Elgar Publishing, 2024), pp. 246 - 262. <https://www.elgaronline.com/edcollbook/book/9781035309511/9781035309511.xml>; Organisation for Economic Co-operation and Development (OECD). "OECD Foreign Bribery Report: An analysis of the crime of bribery of foreign public officials," OECD, 2014. https://www.oecd.org/content/dam/oecd/en/publications/reports/2014/12/oecd-foreign-bribery-report_g1g4d808/9789264226616-en.pdf according to which one in five cases of transnational bribery involves the extractive sector; UNODC. "The nexus between drugs and crimes that affect the environment and convergent crime in the Amazon Basin," United Nations, 2023. https://www.unodc.org/res/WDR-2023/WDR23_B3_CH4_Amazon.pdf which highlights crime convergence between corruption and CAE.

⁵ Christian Nellemann, Rune Henriksen, Riccardo Pravettoni, Davyth Stewart, Maria Kotsoyova, Margaretha Schlingemann, Mark Shaw, Tuesday Reitano. (Eds). 2018. World atlas of illicit flows. A RHIPTO-INTERPOL-GI Assessment. RHIPTO-Norwegian Center for Global Analyses, INTERPOL and the Global Initiative Against Transnational Organized Crime (GI-TOC). www.rhipto.org www.interpol.int ISBN 978-82-690434-2-6 Printed by RHIPTO, which estimates that organized environmental crime generates USD110–281 billion annually in criminal proceeds.

⁶ World Bank Group, Global Wildlife Program (GWP) and Global Environmental Facility (GEF). "Illegal logging, fishing, and wildlife trade: the costs and how to combat it," World Bank Group, GWP and GEF, 2019. <https://thedocs.worldbank.org/en/doc/482771571323560234-0120022019/original/WBGReport1017Digital.pdf> which estimates that the global value of illegal logging, fishing and wildlife trade in 2016 was USD1–2 trillion, and that governments in source countries lose around USD7–12 billion per year in revenues.

⁷ UNODC and World Bank Group. "Addressing corruption risks to safeguard the response to climate change: Discussion Draft II," United Nations, 2024. [https://track.unodc.org/uploads/documents/corruption/Publications/2024/Addressing Corruption Risks to Safeguard the Response to the Climate Change Discussion Draft II.pdf](https://track.unodc.org/uploads/documents/corruption/Publications/2024/Addressing%20Corruption%20Risks%20to%20Safeguard%20the%20Response%20to%20Climate%20Change%20Discussion%20Draft%20II.pdf); Michael Nest, Saul Mullard and Cecilie Wathne, "Corruption and climate finance: implications for climate change interventions," U4 Brief 2020:14 (2020). <https://www.u4.no/api/publications/corruption-and-climate-finance/pdf>; Michael Nest and Saul Mullard, "Climate governance in a fast-changing world: evolving patterns of corruption risks," U4 Issue 2025:2 (2025). <https://www.u4.no/api/publications/climate-governance-in-a-fast-changing-world-evolving-patterns-of-corruption-risks/pdf>; World Bank, Green Climate Fund (GCF), Transparency International. "2nd Symposium

consequences are often severe and irreversible, destabilizing ecosystems and economies, harming communities, and eroding public trust. These governance failures also heighten risks for environmental defenders, who face significantly increased levels of intimidation, violence, and murder in countries with high corruption.⁸

Why we need action now

The UNCAC is a powerful yet underused framework to address corruption driving the triple planetary crisis of climate change, biodiversity loss, and pollution. Leveraging the Convention more effectively is essential to protect natural resources and biodiversity, uphold accountability, integrity, rule of law, security, and public trust in climate and environmental governance.

CoSP resolution 8/12 (2019) marked an important milestone by acknowledging the linkages between corruption and CAE. Yet threats have since intensified. Organized crime groups have expanded their illegal environmental operations, and the scale of climate-related finance has grown exponentially – creating both opportunities for protection and new risks of misuse.

Resolution 8/12 left gaps, particularly on integrity and oversight mechanisms, beneficial ownership transparency, the role of enablers, and the deployment of special investigative techniques and joint investigations, which are crucial tools to effectively prevent and combat corruption facilitating CAE.

There is clear momentum from multiple regional and international fora calling for stronger anti-corruption efforts in this sphere, with the UN Convention against Transnational Organized Crime (UNTOC), the Convention on International Trade in Endangered Species of Wild Fauna

on supranational responses to corruption: integrity in climate finance & action: knowledge report," World Bank, GCF and TI, 2024. <https://www.worldbank.org/content/dam/documents/sanctions/other-documents/2025/may/Knowledge%20Report%20Symposium%20Supranational%20Integrity%20in%20Climate%20Finance.pdf>; Club of Rome, "Open Letter on COP Reform to all States that are Parties to the Convention," Club of Rome, 2024. <https://www.clubofrome.org/cop-reform-2024/> calling for improved oversight of climate financing flows reinforces the urgency of tackling corruption in climate governance; International Court of Justice. *Obligations of States in respect of climate change*, Advisory Opinion, I.C.J. (2025). <https://www.icj-cij.org/sites/default/files/case-related/187/187-20250723-adv-01-00-en.pdf> stating that nations can be held legally accountable for their greenhouse-gas emissions significantly strengthens the legal and moral case for mobilizing much greater flows of climate funding.

⁸ Transparency International. "Corruption perceptions index 2024," TI, 2024. https://www.transparency.de/fileadmin/Redaktion/CPI2024_Report_EN.pdf; United Nations General Assembly. "At the heart of the struggle: human rights defenders working against corruption - Report of the Special Rapporteur on the situation of human rights defenders, Mary Lawlor." A/HRC/49/49, December 28 2021. <https://documents.un.org/doc/undoc/gen/g21/396/47/pdf/g2139647.pdf?OpenElement>; Global Witness. "Missing voices: the violent erasure of land and environmental defenders," Global Witness, 2024. https://gw.cdn.ngo/media/documents/Missing_Voices_-_Global_Witness_land_and_environmental_defenders_report.pdf.

and Flora (CITES), and the European Union (EU) emphasizing the intersection with CAE, and the Convention on Biological Diversity (CBD) highlighting the links with climate change.

The UNCAC is uniquely positioned to bring coherence, embed anti-corruption safeguards into environmental and climate efforts, and bridge silos by applying its tools to CAE, climate action, and the energy transition. It is therefore time for governments to elevate corruption linked to CAE and climate risks on the UNCAC agenda to protect people, including future generations, and the planet.

Recommended elements for inclusion in a resolution

The Working Group on Environmental Crime and Corruption calls upon States to adopt a strong resolution at CoSP11 to ensure UNCAC implementation keeps pace with today's environmental and climate corruption risks.

A new resolution should build on progress made at CoSP10 on promoting integrity, accountability and transparency in the fight against corruption (10/1), small island developing States (10/2), organized crime (10/5), beneficial ownership (10/6), protection of reporting persons (10/8), public procurement (10/9), and emergencies and crisis response and recovery (10/11), and explicitly apply and extend these commitments to the prevention and prosecution of corruption linked to CAE and climate change.

Particularly, the Working Group calls upon States Parties to:

1. **Recognize the UNCAC as a key framework for addressing corruption linked to CAE and climate change**, including corruption risks in climate finance, and strengthen international cooperation in this sphere, including during emergencies and crises.
2. **Ensure integrity throughout the criminal justice chain**, including among customs and border control services and in bodies awarding and overseeing contracts, concessions, permits and licenses.
3. **Strengthen inter-agency cooperation** among environmental protection agencies, anti-corruption bodies, financial intelligence units, law enforcement, and regulatory authorities, and ensure these entities have adequate authority, independence, resources and mandates (articles 6(2), 11, 36).
4. **Expand the use of financial investigations, joint investigations and special investigative techniques** to combat corruption enabling CAE (articles 49, 50), ensuring

these measures are supported by adequate resources and capacity, and implemented with appropriate safeguards for proportionality and fundamental rights.⁹

5. **Treat CAE as predicate offences for money laundering**, and incorporate them into FATF-compliant national risk assessments (article 23).
6. **Guarantee access to adequate, accurate, up-to-date beneficial ownership information**, including on politically exposed persons or excluded individuals holding ownership rights in the natural resources, waste and climate sectors, and ensure central registers are publicly accessible to all relevant stakeholders.
7. **Promote integrity, transparency, accountability and effectiveness throughout the whole cycle of their systems of public procurement, including awarding contracts, concessions, permits and licenses** including in the natural resource, waste and climate sectors, introduce conflict-of-interest measures, and prevent infiltration by organized criminal groups (article 9).
8. **Assess and mitigate corruption risks** across natural resource value chains and in climate change adaptation and mitigation projects.
9. **Promote transparency and accountability of the management, allocation and use of climate finance funds and climate finance reporting**, ensuring effective public participation (article 9(2)), and strengthen oversight and integrity safeguards for carbon market registries.
10. **Strengthen regulatory and supervisory regimes** for banks and non-bank financial institutions and, where appropriate, other bodies particularly susceptible to money laundering linked to CAE.¹⁰

⁹ UNODC. "Set of non-binding recommendations and conclusions based on lessons learned regarding the implementation of chapters III and IV of the United Nations Convention against corruption," (English, Publishing and Library Section, United Nations Office at Vienna), 2020.

https://www.unodc.org/documents/corruption/Publications/2020/20-00843_Ebook.pdf; UNODC. "State of implementation of the United Nations Conventions against Corruption: Criminalization, law enforcement and international cooperation: second edition," (English, Publishing and Library Section, United Nations Office at Vienna), 2017. https://www.unodc.org/documents/treaties/UNCAC/COSP/session7/V.17-04679_E-book.pdf for observations on challenges and best practices on Articles 49 and 50. For evidence from practice showing that the effective use of special investigative techniques has successfully led to the dismantling of major trafficking networks, including corrupt enablers, and contributed to measurable declines in trafficking flows for certain wildlife species, see: Wildlife Justice Commission (WJC). "Disruption and disarray: an analysis of pangolin scale and ivory trafficking, 2015-2024," WJC, 2025. <https://wildlifejustice.org/wp-content/uploads/2025/04/disruption-and-disarray-report-march-2025-v11-pages.pdf>; WJC, "Major breakthrough in pangolin trafficking case: corrupt customs officers arrested in Malaysia," WJC, 2023.

<https://wildlifejustice.org/the-malaysian-anti-corruption-commission-targets-an-international-pangolin-scale-trafficking-syndicate-and-corrupt-law-enforcement-with-the-support-of-the-wildlife-justice-commission/>
¹⁰ Sofia Gonzalez, Sophia Cole and Ian Gary, "Dirty money and the destruction of the Amazon," Financial Accountability and Corporate Transparency (FACT) Coalition, 2023. <https://thefactcoalition.org/wp-content/uploads/2023/10/Dirty-Money-and-the-Destruction-of-the-Amazon-Full.pdf> which shows how enablers can unintentionally or deliberately assist in laundering proceeds from environmental crimes or in moving illicit funds that finance CAE and climate-related harms; United Nations. "Sevilla Commitment:

11. **Enhance protection for reporting persons and whistleblowers** exposing corruption related to CAE, including protection against unjustified treatment, and establish secure, accessible, diversified, and inclusive reporting systems to enhance enforcement efforts (articles 8, 32, 33). Engage with civil society organizations to support environmental whistleblowers in accessing transnational reporting channels that safeguard identity and ensure follow-up action.¹¹
12. **Ensure conditions for individuals and groups outside the public sector** to contribute effectively, independently and without fear of reprisal, including by establishing monitoring and protection mechanisms to help those coming under attack and by applying Free, Prior and Informed Consent (FPIC) for projects affecting communities and Indigenous Peoples (article 13).
13. **Mainstream gender, youth, and access by the public and private sectors to environmental information and open databases**, including environmental impact assessments, and ensure free access to Earth observation satellite data on land use and environmental change.
14. **Seize and confiscate proceeds of corruption linked to CAE**, and ensure recovered assets are used transparently to restore the damage caused to the environment and victims.¹²

outcome document adopted at the Fourth International Conference on Financing for Development," A/RES/79/323, 3 July 2025. https://financing.desa.un.org/sites/default/files/2025-11/FFD4%20Outcome%20Booklet%20v5_EN_Digital%205.5x8.5.pdf which contains a new commitment for regulating professional enablers to address their role in facilitating corruption; Financial Action Task Force (FATF). "International standards on combating money laundering and the financing of terrorism & proliferation: The FATF recommendations," FATF, 2012-2025. <https://www.fatf-gafi.org/content/dam/fatf-gafi/recommendations/FATF%20Recommendations%202012.pdf.coredownload.inline.pdf?nocache=true> which require both financial institutions and non-financial businesses and professions (DNFBPs) including lawyers, notaries, other independent legal professionals and accountants, to take measures to mitigate money laundering risks; FATF. "How can private sector help stop money laundering from illegal wildlife trade?," FATF, 2020. <https://www.fatf-gafi.org/content/dam/fatf-gafi/brochures/Private-sector-and-iwt.pdf>

¹¹ Incentives programs for whistleblower tips may also be considered. See: Masaki Iwasaki, "Environmental governance and whistleblower rewards: balancing prosocial motivations with monetary incentives," Law & Social Inquiry, Volume 50, Issue 2 (2025): 468-503. <https://www.cambridge.org/core/services/aop-cambridge-core/content/view/0250FE9F3B7B484FE2AC80AF620833DC/S0897654625000139a.pdf/div-class-title-environmental-governance-and-whistleblower-rewards-balancing-prosocial-motivations-with-monetary-incentives-div.pdf>.

¹² World Bank, Green Climate Fund, Transparency International. "2nd Symposium on supranational responses to corruption: integrity in climate finance & action knowledge report," World Bank, GCF and TI, 2024. <https://www.worldbank.org/content/dam/documents/sanctions/other-documents/2025/may/Knowledge%20Report%20Symposium%20Supranational%20Integrity%20in%20Climate%20Finance.pdf> which includes recommendations for reparations to victims and communities suffering from corruption related to climate; Juanita Olaya Garcia, "Reparations for corruption: how corruption enforcement ignores victims' rights," UNCAC Coalition, 2020. <https://uncaccoalition.org/reparations-for-corruption-how-corruption-enforcement-ignores-victims-rights/>.

15. **Strengthen technical assistance and capacity-building**, ensure transparency in technical assistance projects, and involve civil society both as providers and recipients of assistance.
16. **Report on progress since Resolution 8/12** and commit to more ambitious, action-oriented, and practical measures, ensuring that the new resolution is designed for effective implementation and supported by regular reporting on its execution.
17. **Collect and analyze good practices, lessons learned, challenges, and data** on anti-corruption measures applied to CAE and climate finance and disseminate findings to inform technical assistance and policy development.
18. **Mandate follow-up through UNCAC working groups**, and enhance cooperation with UNTOC (particularly its Working Group on International Cooperation), UN Framework Convention on Climate Change (UNFCCC), CBD, CITES, and other bodies to address the interlinkages between corruption, CAE, nature conservation, and climate change, avoid duplication, and ensure the efficient and effective use of resources.

Conclusion: Addressing corruption to protect people and planet

The UNCAC must be fully leveraged to respond to some of the gravest threats of our time. This means applying its tools to prevent, detect, and sanction corruption that facilitates environmental crime and climate harm.

There can be no effective environmental protection or climate action without confronting corruption head-on. The UNCAC must evolve to meet this challenge – and CoSP11 offers a decisive opportunity to chart that course.

For further details on our recommendations, as well as good practices and gaps identified in UNCAC implementation related to corruption, CAE, and climate, please refer to the compendium [here](#).¹³

¹³ UNCAC Coalition Working Group on Environmental Crime and Corruption. “Corruption in crimes that affect the environment: A compendium of existing gaps and practices,” UNCAC Coalition, accessed on 21 November 2025. <https://uncaccoalition.org/corruption-in-crimes-that-affect-the-environment-and-climate/>.