

## Transparency in Asset Recovery

Working Group on Asset Recovery<sup>1</sup> of the Global Civil Society Coalition for the UNCAC  
Submission to CoSP11

**20 November 2025**

Transparency is vital in the recovery and return of assets stolen through corruption. Proactive disclosure of data and documents is a key pillar of public accountability. This includes the publication of amounts frozen, confiscated, and returned, as well as case information, legal frameworks, and return agreements.

However, despite more than a decade of commitments<sup>2</sup> made at the UN General Assembly and successive Conferences of States Parties (CoSP) to the United Nations Convention against Corruption (UNCAC),<sup>3</sup> reliable and comparable data on asset recovery remains extremely limited. Official reporting is patchy, fragmented across jurisdictions, and often lacks the transparency needed for meaningful scrutiny. This persistent data gap makes it difficult to assess progress over time and undermines efforts to evaluate whether asset recovery is being conducted in a fair, effective, and inclusive manner.

For civil society, the lack of accessible information severely limits the ability to monitor asset recovery processes, assess their integrity, and engage meaningfully with States to shape more accountable frameworks. It also prevents victims and affected communities from understanding what has been recovered on their behalf, and how.

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<sup>1</sup> The Global Civil Society Coalition for the UNCAC's Working Group on Asset Recovery brings together more than 140 experts from civil society organisations, academia, and other relevant stakeholders. It serves as a space for discussion, knowledge exchange, and shared learning on asset recovery. The Working Group also helps coordinate advocacy efforts and supports the development of stronger international and regional laws and policies in the field. UNCAC Coalition. "Asset Recovery Working Group." UNCAC Coalition, accessed 20 November 2025. <https://uncaccoalition.org/get-involved/working-groups/asset-recovery/>.

<sup>2</sup> See for instance paragraph 20 of General Assembly resolution 77/154 on promoting international cooperation against illicit financial flows and advancing good practices in asset return for sustainable development, as well as Conference of the States Parties resolutions 6/3, 8/9, and 9/2.

<sup>3</sup> Beyond voluntary commitments, States have legal obligations of transparency under various Articles of the United Nations Convention against Corruption (e.g., Articles 5 – *Preventive anti-corruption policies and practices*; 9 – *Public procurement and management of public finances*; 13 – *Participation of civil society*; etc.)

This submission brings together insights from two distinct but complementary research efforts conducted in 2025 by the UNCAC Coalition’s Working Group on Asset Recovery.<sup>4</sup> The first is a survey, coordinated by CiFAR,<sup>5</sup> assessing the availability and accessibility of asset recovery data at the national level. The second, carried out by Transparency International France,<sup>6</sup> is based on data from the StAR Asset Recovery Watch Database.

The survey, launched by the UNCAC Coalition Asset Recovery Working Group in May 2025, assessed the extent to which a sample of governments publicly disclose data related to corruption-related asset recovery.<sup>7</sup> The survey was circulated to members of the Working Group and received responses from 12 civil society organizations and individuals in their personal capacity, covering 15 jurisdictions. These included both major asset-returning jurisdictions and countries engaged in asset recovery efforts.

The survey examined several key areas: the availability and regularity of data on the volume of frozen, confiscated, returned, or received funds; the existence of methodologies used to calculate such figures; the availability of information on ongoing and concluded asset recovery cases; the publication of relevant legislation, national strategies, and cost apportionment criteria; and the accessibility of return agreements. It also assessed the general ease of accessing this information.

The results reveal significant inconsistencies across jurisdictions. Only a minority of countries were found to regularly publish data on asset recovery, and even fewer disclosed the methodologies used to calculate that data, making cross-country comparisons difficult. Access to case-specific information remained highly fragmented. In all surveyed countries, it was difficult to obtain a comprehensive picture of the cases being prosecuted and those that have been completed. While most countries had enacted relevant legislation, fewer than half had published national strategies on asset recovery. Even fewer had published memoranda of understanding or return agreements governing the restitution process. Cost apportionment rules and asset-sharing criteria were rarely found to have been made public, limiting understanding of the difference between recovered and returned assets.

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<sup>4</sup> UNCAC Coalition. “Working Group on Asset Recovery”. Accessed 13 November 2025. <https://uncaccoalition.org/get-involved/working-groups/asset-recovery/>

<sup>5</sup> CiFAR. “CiFAR”. Accessed 13 November 2025. <https://cifar.eu/>

<sup>6</sup> Transparency International France. “Transparency International France”. Accessed 13 November 2025. <https://transparency-france.org/>

<sup>7</sup> UNCAC Coalition Asset Recovery Working Group. “Information and Data Availability in Asset Recovery”, UNCAC Coalition, 2025. <https://uncaccoalition.org/information-and-data-availability-in-asset-recovery/>

In parallel, the UNCAC Coalition Asset Recovery Working Group started an analysis (publication forthcoming) of the StAR Asset Recovery Watch Database.<sup>8</sup> The StAR database is built on responses submitted by States Parties to the UNCAC through a series of questionnaires, as well as open-source research conducted by the StAR Secretariat using official public documents, court decisions, press releases, and credible media or civil society reports.

Leading this research, Transparency International France examined which States responded to the StAR questionnaires.<sup>9</sup> The picture that emerges is patchy. The last questionnaire released by StAR in 2023 yielded replies from 96 States, or 50% of UNCAC State Parties. Some States remained silent despite their involvement in major cross-border corruption or asset recovery cases and despite being members of international fora such as the G7 or the G20. The absence of reporting from these influential jurisdictions is particularly notable given their international commitments to asset recovery transparency.

In addition to low participation rates, the quality and completeness of the data submitted raised further concerns. Although approximately 60% of recorded cases originated from State submissions, StAR's desk research was indispensable in broadening the database's scope. Overall, only about 37% of data fields across the 556 cases in the database were completed. Surprisingly, cases based solely on information provided by States had a completion rate of just 39%, only slightly above the overall average. Key variables – including the country of origin, implicated UNCAC offenses, sectors and intermediaries involved, public officials named, as well as dates of initiation and return – were frequently left blank.

Taken together, these two studies demonstrate that, despite international commitments and repeated calls for improved transparency, the availability of reliable and comprehensive asset recovery data remains extremely limited. Where data is provided, it is often incomplete, inconsistent, or inaccessible, both at the international and national levels.

### **Recommendations to strengthen transparency in asset recovery**

To address these gaps, States should take concrete steps to improve the transparency, accessibility, and consistency of asset recovery data and documentation.

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<sup>8</sup> Stolen Asset Recovery Initiative (StAR). "Guide to the StAR Asset Recovery Watch Database". Accessed 13 November 2025. <https://star.worldbank.org/guide-star-asset-recovery-watch-database>

<sup>9</sup> Stolen Asset Recovery Initiative (StAR). "StAR Asset Recovery Watch Database". Accessed 13 November 2025. <https://star.worldbank.org/asset-recovery-watch-database>

First, governments should set up or designate a dedicated public webpage linking to all relevant information on asset recovery. This should include legislation, national strategies, case information, memoranda of understanding and other agreements, statistics, and methodologies for calculating asset recovery figures. Making this information easy to locate and navigate is essential for public accountability.

Where key documents do not currently exist (for example, policies on cost-sharing or national strategies on asset recovery), States should initiate inclusive processes to develop these frameworks and ensure they are made publicly available.

States should also publish annual asset recovery statistics, accompanied by clear and accessible explanations of how these figures are compiled. Where such statistics are not yet being collected or collated, policies should be adopted to institutionalize regular data collection and publication.

To enhance international cooperation, States should commit to exchanging experiences and pursue coordinated approaches in gathering and presenting asset recovery data, as well as in developing return policies, strategies, and agreements.

States should also continue to regularly transmit case information to the StAR Asset Recovery Watch database and make efforts to identify and close any existing gaps in their reporting.

States should integrate civil society representatives into multi-stakeholder oversight committees and consultation processes for return agreements. Creating such participatory mechanisms would help close the trust gap between authorities and affected communities while improving data accuracy and inclusiveness. Non-governmental and community-based organizations can act as neutral monitors, data intermediaries, and advocates for victim-centered restitution.

Finally, transparency frameworks should be supported by access to information laws that clearly apply to asset recovery processes. Where data is not proactively published, stakeholders should be able to request access through legally guaranteed mechanisms and States should expedite responses to increase public oversight.

By taking these steps, States can contribute to greater global accountability, support victims' rights to redress, and help ensure that the recovery and return of stolen assets serve the public interest.