

Submission from Transparency International on the Baku to Belém Roadmap to 1.3T

March 19, 2025

Transparency International (TI) welcomes the opportunity to share its input ahead of the virtual consultations led by the CMA 6 and CMA 7 Presidencies in 2025 to inform the development of the Baku to Belém Roadmap to 1.3T. As a global movement dedicated to protecting public resources from corruption, TI advocates for greater transparency and accountability in climate finance to ensure necessary funds reach the most vulnerable communities and effectively support mitigation efforts and adaptation to the climate crisis.

(a) What are your overall expectations for the “Baku to Belém Roadmap to 1.3T”?

Corruption undermines climate action by weakening state capacity, diverting critical funds, and distorting policy decisions.¹ The data show that the countries with the greatest need for climate finance often face a high risk of corruption, which puts their ability to effectively implement adaptation and mitigation measures at risk.² Key sectors requiring transformation—such as energy and land use—have been historically particularly susceptible to corruption.³ Additionally, as private sector involvement in climate finance expands, integrity controls remain insufficient, raising concerns about transparency and accountability.⁴

TI urges to mainstream transparency and anti-corruption as a cross-cutting issues in climate finance and put integrity as a key principle to prevent misuse and misallocation of climate funds, particularly in climate-vulnerable regions. This includes emphasizing

¹ Gvantsa Gverdtsiteli and Roberto Martinez B. Kukutschka, ‘How Corruption Undermines Global Climate Efforts’, Transparency International, 11 February 2025, <https://www.transparency.org/en/news/how-corruption-undermines-global-climate-efforts>.

² Michael Nest and Saul Mullard, ‘Climate Governance in a Fastchanging World: Evolving Patterns of Corruption Risks’, U4 Issue (Chr. Michelsen Institute (CMI), 2025).

³ Nieves Zúñiga, ‘Land Corruption Topic Guide’ (Transparency International, January 2018); Ana Estefanía Carballo et al., ‘Global Transition, Local Transformations: Governance Challenges for the Energy Transition at the Sites of Extraction’ (Transparency International Australia, 2025).

⁴ Nest and Mullard, ‘Climate Governance in a Fastchanging World: Evolving Patterns of Corruption Risks’.

clear transparency requirements, strong oversight mechanisms, and coordinated anti-corruption measures to ensure climate finance delivers real impact. Strengthening governance, transparency, and accountability should be recognized as a key strategic action for the Roadmap.

(b) Which topics and thematic issues should be explored to inform the Roadmap, within the scope of the mandate?

To ensure that scaled-up climate finance is effectively and equitably mobilized and deployed, the Baku to Belém Roadmap must address critical governance challenges, with transparency, integrity and accountability as guiding principles. Beyond defining financial goals, strategies, and funding sources, the Roadmap should prioritize:

- **Strengthening integrity of decision-making to protect climate finance discussions from undue influence.** To do this, it is essential to enhance transparency in the decision-making process at the UNFCCC level. The Open Letter from TI and partners, published on March 18, 2025, has called for immediate action to end high polluters lobby’s grip on UN Climate Talks at COP30.⁵
- **Integrating anti-corruption standards and transparency measures across the entire climate finance process.** As climate finance grows, so do risks of corruption and mismanagement. Embezzlement, fraud, and collusion can divert funds from their intended purpose, deepening inequalities and marginalizing vulnerable communities.⁶ To prevent this, the Roadmap must embed transparency and integrity measures across the entire climate finance process. For climate finance to truly serve people and the planet, it must be protected from corruption, designed for inclusion, and governed with integrity, ensuring every dollar reaches its intended purpose.

(c) What country experiences, best practices and lessons learned can be shared related to barriers and enabling environments; innovative sources of finance; grants, concessional and non-debt creating instruments, and measures to create fiscal space?

TI draws on its experience in observing climate finance governance to highlight the following lessons learned regarding barriers, enabling environments, and best practices for climate finance accountability:

⁵ Transparency International, ‘Transparency International and Partners Call for Immediate Action to End High Polluters Lobby’s Grip on UN Climate Talks at COP30’, 18 March 2025, <https://www.transparency.org/en/press/transparency-international-partners-call-immediate-action-end-high-polluters-lobbys-climate-talks-cop30>.

⁶ Michael Nest, ‘Climate and Corruption Atlas: Lessons from Real-World Cases’ (Transparency International, 2024).

- **Transparency in donor support is essential for broader trust and accountability.** One critical lesson from Just Energy Transition Partnerships (JETPs) is the need for donors to lead by example in ensuring timely and comprehensive disclosure of financial support. This includes the nature of support (grants, concessional loans, or other financial instruments) as well as conditions attached to financing agreements that may impact national decision-making and long-term fiscal sustainability. As our research shows, during the initial phase of JETPs, key financial details were not publicly available, limiting national and local stakeholder buy-in and hindering public oversight.⁷ Opacity in funding modalities and conditions not only reduce trust towards climate finance initiatives from national stakeholders, but also restricts civil society organizations and independent watchdogs from monitoring whether funds are truly advancing climate goals, or if they risk serving the interests of a select few.
- **Independent oversight mechanisms can safeguard climate funds against mismanagement and corruption.** Independent oversight mechanisms, such as the Green Climate Fund (GCF) Independent Integrity Unit (IIU), play a vital role in ensuring accountability in global climate finance.⁸ A key component of IIU’s framework is a robust integrity policy, which includes ethics and conflict of interest policies, as well as whistleblower and witness protection measures – critical safeguards that should be embedded in all climate finance initiatives. By establishing preventive, investigative, and enforcement mechanisms, the IIU helps mitigate the risks of corruption, fraud, and financial mismanagement, ensuring that climate finance is used transparently and effectively.
- **Digital platforms for disclosing climate finance information can serve as accountability mechanisms to track progress and ensure funds are used effectively.** Pakistan’s Balochistan Climate Change Policy (BCCP) incorporates transparency and accountability measures for climate-related projects.⁹ To uphold these principles, the Balochistan Public Procurement Rules (2014) mandate compliance in emergency response and climate finance initiatives. Additionally, climate and disaster response actions will be publicly disclosed through a web-based dashboard and the Government of Balochistan websites, enhancing oversight, accessibility, and public trust in climate finance management.
- **Multi-stakeholder platforms can be an effective way to combat corruption in climate finance.** Establishing multi-stakeholder platforms can be an effective

⁷ Gvantsa Gverdtsiteli, ‘Strengthening Just Energy Transition Partnerships (JETPs): Lessons Learned for a Just Energy Transition’ (Transparency International, 2024).

⁸ GCF Independent Integrity Unit, ‘Annual Report of the GCF Independent Integrity Unit 2024’ (Green Climate Fund, March 2025).

⁹ Hamid Sarfraz et al., ‘Balochistan Climate Change Policy’ (Government of Balochistan and United Nations Development Programme, June 2024).

strategy to enhance transparency and accountability in climate finance allocation. A notable example is Kenya's Task Force on Anti-Corruption for REDD+, which brought together key actors from government, multilateral agencies, and civil society to address corruption risks in REDD+ implementation.¹⁰ The Task Force played a crucial role in tackling systemic corruption in Kenya's forest sector, which had undermined climate and conservation efforts. It also responded to low awareness of anti-corruption and transparency issues among REDD+ stakeholders and helped bridge tensions between government institutions, civil society, and communities over forest governance. Through its work, the Task Force contributed to the adoption of a Code of Conduct for the Kenya Forest Service (KFS), a significant step toward strengthening integrity and accountability in climate-related finance and governance.

(d) Which multilateral initiatives do you see as most relevant to take into account in the Roadmap and why?

To ensure the integrity, effectiveness, and accountability of scaled-up climate finance, the Baku to Belém Roadmap should align with and strengthen cooperation with relevant UN conventions and agreement focused on anti-corruption and integrity issues. Climate finance does not operate in isolation; it must integrate best practices from global governance initiatives that address corruption and accountability gaps.

Key multilateral initiatives that should be considered include:

- **United Nations Convention Against Corruption (UNCAC).** UNCAC provides the only legally binding global framework for combating corruption, offering a comprehensive approach covering prevention, enforcement, and asset recovery. The Convention plays a crucial role in uniting countries against corruption and fostering effective international cooperation. The Roadmap should promote compliance with UNCAC commitments, particularly in relation to anti-corruption, public procurement, financial disclosure, and participatory measures in climate finance.
- **United Nations Office on Drugs and Crime (UNODC).** As the guardian of UNCAC, UNODC plays a crucial role in assisting countries in strengthening anti-corruption enforcement and capacity building. The Roadmap should facilitate technical assistance, policy coordination, and capacity-building programs in collaboration with UNODC to help recipient countries develop stronger anti-corruption controls in climate finance governance.

¹⁰ Bernardo Monzani, 'Kenya's Task Force on Anti-Corruption for REDD+: Assessment Report' (Transparency International, September 2017).

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