

Submission on the “Baku to Belém Roadmap to 1.3T”

Submitted by:

The UNCAC Coalition Working Group on Environmental Crime and Corruption

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This submission is prepared by the UNCAC Coalition’s Working Group on Environmental Crime and Corruption. The Working Group aims to raise policymakers’ awareness of the nexus between environmental crime and corruption and its harmful impact on the environment, the climate, and human rights. The Working Group also promotes the adoption and effective implementation of robust policies and other measures by States to prevent and combat this issue effectively. The Working Group consists of over 230 civil society members worldwide and is chaired by the Wildlife Justice Commission.¹

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

Corruption undermines the effectiveness of climate financing, preventing the funds that are mobilized from achieving their intended purpose of combating climate change. Scaling up financing for a low-emission, climate-resilient future requires balancing the urgency of climate action with the necessity of upholding good governance and accountability.² Therefore, the Roadmap must lay out concrete measures to address this barrier through anti-corruption, transparency, and accountability measures to ensure the proper use and management of climate funds and a just energy transition. Below, we have provided more details on why and how this thematic issue should be included in the Roadmap, and the relevant multilateral fora and initiatives to fully utilize to help achieve the Roadmap’s goals.

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

With the need to effectively mobilize and deliver significant resources from the public and private sectors to achieve climate protection goals, it is critically important that the Baku to Belém Roadmap include as a key strategic action the thematic issue of anti-corruption, transparency, and accountability to ensure the proper management and use of climate funds. Corruption is a systemic, cross-cutting issue that can hinder the effectiveness of climate responses, lower states’ capacity to tackle climate change, and distort

¹ For more information about the UNCAC Coalition’s Working Group on Environmental Crime and Corruption, see: <https://uncaccoalition.org/get-involved/working-groups/environmental-crime-and-corruption/>. Also see the Working Group’s discussion paper on this issue, “Breaking the silos: Combating corruption and environmental crime to achieve climate protection goals” (2024), <https://uncaccoalition.org/breaking-the-silos-combating-corruption-and-environmental-crime-to-advance-climate-protection-goals/>; Open Letter from 301 organizations and experts calling for UNCAC States Parties to take action on environmental crime and corruption, including a call to adopt “good governance and anti-corruption measures to achieve climate mitigation and biodiversity conservation goals and in the proper management and use of climate finance funds”: <https://uncaccoalition.org/wp-content/uploads/Open-letter-for-CoSP10-on-environmental-crime-and-corruption.pdf>.

² Dieter Zinnbauer (2025), “Doing integrity fast - how to reconcile the measured pace of accountability with the speed imperative of the energy transition”, https://api.transparencyinitiative.org/uploads/Doing_integrity_fast_5_1_0e497ebf02.pdf.

relevant policymaking processes, presenting risks in both the global north and the global south.³ It can result in the misappropriation and mismanagement of multilateral and bilateral climate funds, impeding efforts to meet climate mitigation and adaptation goals.⁴ In addition, the lack of transparency in fund allocation and management, limited access to climate finance data, and insufficient accountability of⁵ accredited agencies, along with a lack of inclusive participation in these projects, can further exacerbate these corruption risks.⁶

Bribery, embezzlement, money laundering, conflicts of interest, undue influence, and other forms of corruption can impede the ability of climate finance projects to achieve their intended goals. Corruption in procurement processes and secrecy of the beneficial owners of corporate vehicles to conceal the proceeds of corruption and other crimes also present significant risks for climate finance projects.⁷ These corruption risks are of particular concern in the green energy sector, the natural resource sector, and the construction and infrastructure sectors.⁸ Organized criminal networks attracted by large sums in the climate domain may also infiltrate this field and engage in the natural resource and renewable energy

³ UNODC, World Bank (2024), “Addressing corruption risks to safeguard the response to climate change: Discussion Draft II”, p. 4

https://track.unodc.org/uploads/documents/corruption/Publications/2024/Addressing_Corruption_Risks_to_Safeguard_the_Response_to_Climate_Change_Discussion_Draft_II.pdf.

⁴ See U4 Issue (2025) “Climate governance in a fast-changing world: Evolving patterns of corruption risks”, <https://www.u4.no/publications/climate-governance-in-a-fast-changing-world-evolving-patterns-of-corruption-risks.pdf>; Transparency International, “Corruption Perceptions Index 2024”, <https://www.transparency.org/en/cpi/2024>.

⁵ This should include widespread access to Earth observation satellite data of land use and environmental change and other relevant data to ensure its availability to Indigenous Peoples, communities, and other non-state actors.

⁶ IPCC (2022), “Climate Change 2022: Impacts, Adaptation and Vulnerability: Working Group II Contribution to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change”, p. 980,

https://www.ipcc.ch/report/ar6/wg2/downloads/report/IPCC_AR6_WGII_FullReport.pdf. This report highlights that “Corruption and misuse of climate finance is exacerbated by limited public access to information, political considerations in finance decision making and lack of accountability for decisions and actions”. Transparency International Madagascar (2023), “Analyse des risques de corruption dans le secteur de la gouvernance climatique et des mécanismes de financement climatique à Madagascar (Analysis of Corruption Risks in the Climate Governance Sector and Climate Finance Mechanisms in Madagascar)”, <https://www.transparency.mg/ressources/>.

⁷ Michael Nest (2024), “Climate and Corruption Case Atlas: Lessons from Real-World Cases” (Transparency International), https://www.transparency.org/en/projects/climate-governance-integrity-programme/climate-corruption-atlas?utm_source=linkedin&utm_medium=social&utm_campaign=climate.

⁸ Basel Institute on Governance (2024), “Good governance and the just transition: Implications for renewable energy companies”, <https://baselgovernance.org/sites/default/files/2024-09/WP53.pdf>; U4 Helpdesk (2023), “Land corruption risks in the green energy sector”, <https://www.u4.no/publications/land-corruption-risks-in-the-green-energy-sector>; IPCC (2022), “Climate Change 2022: Impacts, Adaptation and Vulnerability: Working Group II Contribution to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change”, p. 980, https://www.ipcc.ch/report/ar6/wg2/downloads/report/IPCC_AR6_WGII_FullReport.pdf. Corruption in the construction and infrastructure sectors can lead to faulty design, the use of substandard materials, and inadequate maintenance, thus generating maladaptation to climate change.

sectors, exploiting the loopholes, weak oversight, and inconsistent knowledge and response by involved parties when corruption is detected. These challenges are pervasive in many countries.⁹

Corruption also enables a wide range of crimes that breach environmental protection laws and cause significant harm to the climate, environment, biodiversity, and people, undermining climate mitigation efforts, human rights, the rule of law, public health, and security.¹⁰ These environmental crimes include illegal wildlife trade,¹¹ Illegal Unreported and Unregulated fishing (IUU fishing), illegal logging, illegal mining, and waste trafficking and pollution.

Therefore, mitigation of corruption and crime risks must be an integral part of efforts to scale up climate finance to developing countries and to ensure that these funds are impactful in supporting low greenhouse gas emissions and climate-resilient development pathways. Below are specific measures and actions to mitigate these risks that we propose should be integrated into the Roadmap:

- **Adopt a standing agenda item at the UN Framework Convention on Climate Change (UNFCCC) Conference of Parties (COP) to discuss and address integrity challenges to help achieve mitigation and adaptation goals.** Develop a structured process and work program for receiving inputs from intergovernmental organizations as well as non-state actors, such as civil society organizations and experts on anti-corruption. This could reinforce efforts to promote good governance in climate financing to achieve the Roadmap's goals.¹²
- **Promote the adoption of anti-corruption assessments into Nationally Defined Contributions (NDCs), National Adaptation Plans (NAPs), and national climate strategies, plans, laws, and policies to mainstream anti-corruption considerations from the outset of climate planning.** Anti-corruption assessments should identify risk areas for the various forms of corruption and measures to mitigate and address corruption and crime risks. As part of the Paris Agreement's Enhanced Transparency Framework, countries should report in their Biennial Transparency

⁹ See U4 Issue (2025) "Climate governance in a fast-changing world: Evolving patterns of corruption risks", which identifies the growing threat from infiltration of organized crime networks as climate investments increase.

¹⁰ WWF and UN Office of Drugs and Crime (UNODC), (2022), "Crimes that Affect the Environment and Climate Change", https://files.worldwildlife.org/wwfcmsprod/files/Publication/file/8mie6esklg_Crimes_that_Affect_the_Environment_and_Climate_Change.pdf; UNODC (2023), "The Drugs-Crime Nexus in the Amazon Basin", https://www.unodc.org/res/WDR-2023/Research_Brief_Amazon_FINAL.pdf; UN General Assembly, "Report of the Special Rapporteur on the issue of human rights obligations relating to the enjoyment of a safe, clean, healthy and sustainable environment, David R. Boyd", <https://documents.un.org/doc/undoc/gen/n20/184/48/pdf/n2018448.pdf>. See para 26: "Efforts to protect nature are undermined by prioritizing economic growth, trade and corporate profits over environmental protection and addressing weaknesses in the rule of law (e.g., corruption and weak institutions), poverty, armed conflict, limited civic space, the criminalization of human rights defenders and the failure to recognize the rights of indigenous peoples and local communities."

¹¹ Wildlife Justice Commission (2023), "Dirty Money: The Role of Corruption in Enabling Wildlife Crime", <https://wildlifejustice.org/wp-content/uploads/2023/07/corruption-report-2023-SPREADS-V12.pdf>.

¹² Minas, Stephen (2024), "The Contribution of the Conference of the Parties to a Supranational Anti-corruption Ecosystem", available at SSRN: https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4993970.

Reports (BTRs) efforts to foster transparency, accountability, and integrity and to mitigate corruption and crime risks in their mitigation and adaptation programs.¹³

- **Adopt anti-corruption standards to safeguard the integrity of the COPs.** The adoption of clear standards such as conflict of interest policies, transparency standards, a publicly accessible platform of affiliations at COPs, transparency of COP preparations and hosting arrangements, and a reformed COP presidency selection process, is urgently needed to address corporate undue influence, greenwashing by corporate and government interests, and other governance challenges that seriously undermine the effectiveness and credibility of COPs.¹⁴
- **Strengthen climate finance reporting and access to information.** An open letter from world climate leaders released at COP29 includes an important and relevant recommendation to include in the Roadmap related to ensuring robust tracking of climate financing. The letter calls for “standardised definitions and criteria for what qualifies as climate finance, along with common reporting frameworks and tracking mechanisms to verify climate financing flows”.¹⁵ The Roadmap should address how to enhance reporting to track and verify climate finance flows transparently and ensure adequate access to information on climate financing, data, and projects, to promote greater accountability in the management and use of funds.
- **Promote public participation and monitoring of climate finance projects to ensure that climate funds are impactful.** The Roadmap should address how to promote meaningful public participation and effective oversight mechanisms in the management and use of climate funds. Public participation and robust oversight mechanisms are absolutely critical to ensure that climate funds help achieve climate protection goals and benefit communities and those most affected by climate change, especially populations vulnerable to climate change.¹⁶ This should include the following measures:
 - Legally require and effectively implement robust protection and reporting mechanisms for whistleblowers from the public and private sectors who report corruption linked to

¹³ As part of the Paris Agreement’s Enhanced Transparency Framework, countries should report on efforts to foster transparency, accountability, and integrity and to mitigate corruption and crime risks in their mitigation and adaptation programs, see UNODC (2024), “[Integrating crimes that affect the environment in national climate action](#)”.

¹⁴ Transparency International (2024), “COP Co-Opted? How Corruption and Undue Influence Threaten Climate Action”, <https://www.transparency.org/en/publications/cop-co-opted-how-corruption-and-undue-influence-threaten-multilateral-climate-action>.

¹⁵ See: www.clubofrome.org/cop-reform-2024.

¹⁶ U4 Issue (2025) “Climate governance in a fast-changing world: Evolving patterns of corruption risks”, which states that “Civil society and community stakeholders have a critical role in monitoring climate initiatives for integrity breaches”, <https://www.u4.no/publications/climate-governance-in-a-fast-changing-world-evolving-patterns-of-corruption-risks.pdf>.

environmental and climate offenses, providing secure and anonymous reporting channels.¹⁷

- Promote a safe and enabling environment for environmental human rights defenders, whistleblowers, journalists, and other civil society actors to operate free from threats, harassment, intimidation, and violence, including through the adoption of protection laws consistent with international human rights standards, ensuring that this work is not criminalized or stigmatized, and developing programs for protection and early warnings.
 - Implement a rights-based approach of Free, Prior, and Informed Consent (FPIC) to obtain consent and approval of communities and Indigenous Peoples before initiating projects that affect their environment and actively involve them in the design, implementation, and monitoring of climate finance projects.
 - Use funds recovered from sanctions resulting from corruption and fraud in climate mitigation and adaptation projects to compensate the communities and victims that have suffered from these flawed projects.¹⁸
- **Ensure procurement transparency and integrity to prevent corruption in climate projects:** The Roadmap should address the activity in the government that is most vulnerable to corruption, waste, and mismanagement: public procurement processes, which pose significant risks in the natural resource and green energy sectors.¹⁹ The Roadmap should promote transparency, integrity, and accountability for awarding, granting, and managing contracts, concessions, permits, and licenses across the value chain in the environmental sector. This includes ensuring open, equitable, fair, and competitive procedures along the whole procurement cycle, including in the procurement of renewable energy sources and critical minerals, with systematic digital disclosure and transparency of information and open data on project-level contracts, payments, and revenue allocation.²⁰

¹⁷ Consistent with UNCAC Articles 32 and 33 and UNTOC Article 24; see UNCAC CoSP Resolution 10/8: Protection of reporting persons, https://www.unodc.org/documents/treaties/UNCAC/COSP/session10/resolutions/L-documents/2325382E_L12_Rev.1.pdf.

¹⁸ Felipe Freitas Falconi, José Ugaz, Juanita Olaya Garcia, Yara Esquivel Soto (2023), Victims of Corruption Back for Payback, Stolen Recovery Initiative, https://star.worldbank.org/sites/default/files/2023-11/Victims-report-05_0.pdf.

¹⁹ See OECD: <https://www.oecd.org/en/topics/sub-issues/integrity-in-public-procurement.html>, U4 (2025), “Climate governance in a fast-changing world: Evolving patterns of corruption risks” concludes that “Robust tender processes will help prevent corrupt behaviour”.

²⁰ See UN General Assembly Special Session (UNGASS) against Corruption Political Declaration (2021), see the OPs focused on public procurement, including OPs 5, 10 and 11, <https://docs.un.org/en/A/RES/S-32/1>. UNCAC CoSP Resolution 10/9 on “Promoting transparency and integrity in public procurement in support of the 2030 Agenda for Sustainable Development”. UNODC “Preventing and combating corruption as it relates to crimes that have an impact on the environment” (2021), cites need for transparent, competitive procurement processes and “increased transparency of procedures, including those dealing with eligibility criteria, fees and systems related to permits and licenses;”, p. 50. See Natural Resource Governance Institute (2025), “Ten Red Flags for Corruption Risk in Transition Minerals Licensing and Contracting”, <https://resourcegovernance.org/publications/ten-red-flags-corruption-risk-transition-minerals-licensing-and-contracting>. See Extractive Industries Transparency Initiative for corruption risks in the natural resource sector and [Guide](#) for how to reduce corruption risks in this sector.

(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?

As outlined above, corruption and integrity risks present barriers to the Roadmap achieving its intended goal of scaling up climate finance from both the private and public sectors and ensuring that the funds are managed and used in such a way that will achieve effective climate responses. Anti-corruption, transparency and accountability measures, and inclusive approaches to the design and implementation of climate finance projects, create an enabling environment that can lead to impactful outcomes in global, regional, and national efforts to combat climate change.

Please see more details below under (d) about relevant multilateral fora, initiatives, tools, and oversight mechanisms that should be integrated into the Roadmap. These relevant fora and initiatives provide concrete country experiences, best practices, and tools that should be applied and scaled up to create the enabling environments for effective climate finance and action. Best practices to enhance accountability include: **transparency and access to information** to ensure that the public and relevant stakeholders have access to information that helps detect and deter corruption, and the misuse and waste of climate funds,²¹ **donor transparency** that provides comprehensive and timely information on funding support, including the types of funding and conditions of support that have implications for a government's fiscal management²², **independent oversight mechanisms** to monitor and ensure accountability in the use and management of funds²³ and **meaningful civil society participation and multi-stakeholder initiatives** that not only help achieve climate mitigation and adaptation goals but also ensure that climate funds benefit communities and other local stakeholders that are most vulnerable to climate change impacts.²⁴

²¹ See Open Government Partnership's "OpenGov Guide" which includes a section on climate finance providing information on open government approaches to increase public oversight of climate funds: <https://www.opengovpartnership.org/open-gov-guide/climate-and-environment-climate-finance/>. Information on climate projects and financing should be published online and regularly updated. Strong access to information laws should comply with international standards and be complemented by independent and autonomous oversight bodies, and comprehensive requirements for a proactive publication of information, documents, and data.

²² See: <https://www.transparency.org/en/publications/strengthening-just-energy-transition-partnerships-jetps-lessons-learned-for-a-just-energy-transition>.

²³ One oversight mechanism that provides a good practice example is the Green Climate Fund's Integrity Unit, which operates independently of the Green Climate Fund and works to mitigate integrity risks through investigations, capacity building, and other measures. See: <https://iiu.greenclimate.fund/>. Ensuring adequate oversight mechanisms is also important for other entities including the private sector, supreme audit institutions, and international financial institutions (including strengthening cooperation across accountability and integrity programs within IFIs).

²⁴ For examples of good practices in promoting civil society participation and oversight, see Accountability Lab and TAI Collaborative (2024), "[The role of civil society oversight and social accountability in climate finance and action](#)". Multi-stakeholder initiatives (MSIs) have the potential to leverage the unique strengths and international networks of NGOs, citizens, government agencies, experts, businesses, financial institutions, and other stakeholders in a cross-sectoral approach to address corruption effectively across various sectors.

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

The Roadmap should lay out a plan for making linkages with other multilateral agreements, fora and initiatives focused on anti-corruption, governance, and integrity that are relevant and important for ensuring the effective use and management of climate funding. Below are specific ideas for what to include in the Roadmap to fully utilize relevant fora and agreements in a coordinated manner to strengthen governance of climate financing:

- **Apply the UN Convention against Corruption (UNCAC) to prevent and combat the mismanagement and misappropriation of climate finance funds:** The UNCAC is the only legally binding, universal anti-corruption instrument that covers a wide range of measures to tackle corruption, including preventive measures, criminalization, and law enforcement, international cooperation, asset recovery, technical assistance, and information exchange.²⁵ With 191 States Parties, the UNCAC is an important framework that should be deployed to prevent and combat the mismanagement and misappropriation of climate finance funds. States should effectively implement the relevant provisions of the UNCAC to prevent bribery, embezzlement, money laundering, conflicts of interest, financial crime, and other forms of corruption and to establish robust oversight mechanisms to ensure that climate funds meet their intended goals in achieving climate mitigation and adaptation goals.²⁶ Other international agreements, fora, and standards that are also very relevant and should be utilized to address this issue include the UN Convention against Transnational Organized Crime (UNTOC), the Financial Action Task Force (FATF) Recommendations, the OECD Anti-Bribery Convention and the Commission on Crime Prevention and Criminal Justice (CCCJ). The Roadmap should promote compliance with commitments contained in these conventions and recommendations.
- **Coordinate and collaborate with relevant anti-corruption fora and actors:** The Roadmap should include a plan for outreach, collaboration, and coordination between the UNFCCC and the UNCAC and other relevant UN conventions and agreements focused on anti-corruption, transparency, and integrity issues to strengthen governance and oversight of the management and use of climate finance funds. For example, promoting mechanisms for coordination and cooperation between the UN Framework Convention on Climate Change (UNFCCC), UNCAC, and UNTOC,²⁷ and

²⁵ See: <https://www.unodc.org/corruption/en/uncac/index.html> and <https://uncaccoalition.org/the-uncac/about-the-uncac/>.

²⁶ “Chapter 4: The nexus between drugs and crimes that affect the environment and convergent crime in the Amazon Basin”, World Drug Report 2023, https://www.unodc.org/res/WDR-2023/WDR23_B3_CH4_Amazon.pdf, UNODC & WWF, “Crimes that affect the environment and climate change”, https://files.worldwildlife.org/wwfmsprod/files/Publication/file/8mie6esklg_Crimes_that_Affect_the_Environment_and_Climate_Change.pdf;

²⁷ See CoSP Resolution 10/5, which is the first UNCAC resolution focused on organized crime and corruption: https://www.unodc.org/documents/treaties/UNCAC/COSP/session10/resolutions/L-documents/2325374E_L.9_Rev.1.pdf.

their Secretariats and Subsidiary Bodies/Working Groups and review mechanisms,²⁸ as well as developing technical assistance, training, capacity building, guidance, and good practices in applying these agreements to increase the impact in effectively addressing the intersection of climate change, corruption, and organized crime.²⁹ The Roadmap should also promote strong coordination and cooperation between law-enforcement organizations, investors, multilateral finance institutions, regional and global intergovernmental organizations, donors, and recipients to prevent and combat the threat corruption and organized crime networks pose to climate finance.³⁰

²⁸ Such cooperation should extend to the regional and national levels. For example, the UNODC, the Secretariat for the UNCAC and UNTOC, has regional anti-corruption hubs which should collaborate and coordinate with the UNFCCC's Regional Collaboration Centres, to integrate anti-corruption safeguards in efforts to implement National Defined Contributions and National Adaptation Plans.

²⁹ Other fora have recognized linkages between biodiversity and climate change and have called for greater coordination and synergies between different fora. For example, the impacts of biodiversity loss on ecosystems and climate, were clearly recognized by the Convention on Biological Diversity (CBD), see the [Decision 16/22 on Biodiversity and climate change](#) adopted on 1 November 2024. OPs 11-14, and 19 concretely lay out how to strengthen coordination between the CBD and the UNFCCC. OP 14 calls upon "the President of the sixteenth meeting of the Conference of the Parties to the Convention to engage the Presidents of the twenty-ninth and thirtieth sessions of the Conference of the Parties to the United Nations Framework Convention, respectively, on opportunities for strengthened multilateral coordination on climate change and biodiversity loss".

³⁰ See U4 Issue (2025) "Climate governance in a fast-changing world: Evolving patterns of corruption risks".