



Saplings of hope

Addressing corruption that has an impact on the environment in line with UNCAC Resolution 8/12 and beyond

Sophie Lemaître and Amanda Cabrejo le Roux | December 2025



About this report

Adopted in 2019, UNCAC Resolution 8/12 – *Preventing and combating corruption as it relates to crimes that have an impact on the environment* – urges States Parties to prevent, investigate and prosecute corruption offences where they may be linked to crimes that have an impact on the environment.

Saplings of hope provides an updated overview of emerging and promising initiatives across the world since the adoption of Resolution 8/12, focusing on progress in 2024 and 2025.

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It provides an update to Working Paper 50, 'Seedlings of hope: Addressing corruption linked to crimes that impact the environment in line with UNCAC Resolution 8/12', which was prepared in the context of CoSP10 in Atlanta, Georgia, US in 2023.

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About the authors

**Dr Sophie Lemaître, main author**

Anti-corruption and natural resources expert

Dr Sophie Lemaître is a lawyer by training with experience in anti-corruption issues, natural resources sector, and lawfare. She worked for various organisations and NGOs at the national and international level, including CIRAD, the Food and Agriculture Organisation of the United Nations, Sherpa and U4 Anti-Corruption Resource Centre.

Sophie holds a PhD degree in Law from the University of Rennes 1 (France) on illicit financial flows within the extractive industries. She also holds a Master's degree in International Business Law from the University of Toulouse (France) as well as an LL.M. in International and European Environmental Law and Policy from University College London (United Kingdom).

Email: sophie.lemaitre34@gmail.com

**Dr Amanda Cabrejo le Roux**

Senior Specialist and Deputy Director of the Green Corruption programme, Basel Institute on Governance

Dr Amanda Cabrejo le Roux leads the implementation of the Basel Institute's Green Corruption activities in Africa, Asia and South America. She also leads research efforts and the involvement of the Green Corruption programme in the Countering Environmental Corruption Practitioners Forum.

Amanda holds a PhD in International and Comparative Criminal Law from the Sorbonne Law School (University Paris I Pantheon-Sorbonne). She also holds an LL.M. in International Criminal Law (University of Amsterdam/Columbia Law School), Master's degrees in French Law and Comparative Criminal Law (Sorbonne Law School) and Spanish Law (Universidad Complutense), and Bachelor's degrees in History (University Paris 1) and Anthropology (University Paris 8).

Email: amanda.cabrejo@baselgovernance.org

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Executive summary

Adopted in 2019, UNCAC Resolution 8/12 – *Preventing and combating corruption as it relates to crimes that have an impact on the environment* – urges States Parties to prevent, investigate and prosecute corruption offences where they may be linked to crimes that have an impact on the environment.

In 2023, the Basel Institute on Governance published its Working Paper 50, *Seedlings of hope*, providing a panorama of emerging and promising initiatives across the world since the adoption of Resolution 8/12. The purpose of the updated report *Saplings of hope* is to highlight what progress has been achieved since then.

Corruption prevention measures

States have implemented a host of initiatives to strengthen integrity systems. Most commonly, this included the revision and adoption of internal control policies, more dedicated risk management efforts, including through the establishment of corruption prevention committees, and a range of capacity building efforts to strengthen environmental agencies' ability to mitigate their own corruption risks, such as workshops on ethics codes and other integrity measures. Whistleblower protection programmes were increasingly designed, implemented and promoted. Corruption risk assessments were conducted in sectors such as wildlife management, forestry and fisheries.

Promising corruption prevention interventions include:

- **Conducting regular corruption perception and experience surveys among staff.** This can help assess both progress and the effectiveness of corruption prevention measures. It can also create baselines against which to measure progress. Not enough interventions and reform efforts start with such a baseline, which means they then struggle to assess progress.
- **Involving high-level management and leadership** at each stage of the corruption prevention approach. This can help develop ownership and accountability. Explaining how integrity efforts support the strategic and political priorities of the leadership is crucial to achieve this. It requires adapting technocratic approaches to be relevant to the institutional leadership.
- **Stipulating a mandatory budget for corruption prevention** across ministries, agencies and departments. This can help ensure that minimal investments in integrity and anti-corruption activities are effectively prioritised and implemented. Sanctions for not respecting the mandatory budget should be imposed.
- **Launching awareness-raising campaigns** to promote knowledge of anti-corruption measures. This is an important first step to their effective implementation.

- **Developing whistleblowing mechanisms.** They can help increase reporting and detection of corruption. To achieve their potential, whistleblower mechanisms require a strong system, reliable protections and an institutional culture that welcomes such feedback.
- **Peer-to-peer learning for government representatives from different countries and institutions to exchange** on corruption prevention actions. This can be relevant, as anti-corruption officials often struggle with similar institutional challenges. Peer exchanges can help people and institutions to learn from each other's successes and challenges and jointly identify effective mitigation measures.

Enforcement actions

Several countries have investigated and prosecuted corruption cases linked to crimes that have an impact on the environment. Financial investigations and money laundering legislation are more frequently used to tackle these crimes. The systematic seizure and confiscation of assets is still just beginning, as is the creation of multi-agency and interdisciplinary task forces, nationally and internationally. However, enforcement actions on *corruption* as it relates to crimes that have an impact on the environment are still limited.

Promising enforcement interventions include:

- **Assessing the economic, social and environmental losses** from cases of corruption linked to crimes that have an impact on the environment – and using these to calculate associated penalties and fines – can help compensate and restore some of the harm done. Combining calculations of losses due to corruption with those of losses due to the environmental crimes can result in stiffer sentences and penalties.
- **Seizing and confiscating proceeds and instrumentalities of crime** (bank accounts, real estate, vehicles, machineries, etc.) through the diverse legal instruments available in jurisdictions can help ensure that crime does not pay. It also removes the resources needed to continue activities that harm the environment, thereby halting ongoing destruction.
- **Exploring legal avenues outside the anti-corruption field** can help strengthen enforcement. These include legislation on money laundering and tax offences as well as the social re-use of seized and confiscation assets, sanctions and visa bans.

Essential role of civil society and the media

Alongside States, civil society organisations and the media have played an essential role in increasing our understanding of the relationship between corruption and crimes that have an impact on the environment.

Their efforts span investigative reporting, publishing evidence-based research, capacity building, creating networks to bridge the gap between anti-corruption and environmental practitioners, as well as initiating strategic litigation cases. Their involvement is all the more commendable given that they are facing an increasingly repressive environment.

The way forward

As this Working Paper highlights, various activities are taking place to tackle corruption linked to crimes that have an impact on the environment. The paper picks out those that show significant promise. The diversity of engagements is laudable, but it is far from the scale needed to make a systemic difference to both societal corruption and environmental challenges. States Parties need to adapt and scale up initiatives that are effective or look promising, by, among other things:

- **Ensuring more robust staffing and prioritisation of corruption prevention systems** in government and state-owned enterprises tasked with conserving, managing or trading natural resources.
- **Developing specialised knowledge and expertise** of governmental institutions and agencies to better address corruption that impacts the environment.
- **Incorporating anti-corruption measures into environmental and natural resource policies** and strengthening environmental governance structures to include anti-corruption internal controls and mechanisms.
- **Dedicating greater resources for specialised law enforcement** to pursue complex financial flows linked to corruption and crimes that have an impact on the environment.
- **Increasing inter-agency collaboration** and conducting joint operations on corruption that has an impact on the environment.
- **Making use of legal frameworks and testing new legal avenues** to hold individuals and legal persons accountable, including through asset recovery and remedies to repair the damage.
- **Engaging in platforms** for representatives from governments, civil society and other stakeholder groups to exchange experiences and know-how in tackling corruption that has an impact on the environment.
- **Sharing knowledge**, case law, success stories, etc.
- **Ensuring that this issue is integrated in all relevant United Nations processes** such as the ones related to climate and biodiversity.

- **Protecting and defending civil society space, press freedom and human rights defenders** working on the environment and corruption-related issues.

As these initiatives have now been conducted for six years, there is a sufficient body to scrutinise their effectiveness and efficiency. It is therefore **essential to rigorously assess these measures**, especially in an environment of increasingly scarce financial resources.

Addressing corruption that has an impact on the environment

The Working Paper also makes a case for moving from the concept of “corruption as it relates to crimes that have an impact on the environment” to “**corruption that has an impact on the environment**”.

Focusing solely on corruption linked to crimes that have an impact on the environment overlooks situations where corruption causes environmental harm without an associated criminal offence. It does not take into consideration pressing issues such as corruption linked to climate finance, renewable energy and the exploitation of critical minerals.

Adopting a holistic approach is crucial to address all forms of corruption that affect the environment, and thus to protect the environment and people.

Acronyms and abbreviations

ACAMS	Association of Certified Anti-Money Laundering Specialists
AI	Artificial intelligence
CIJ	Centre for Investigative Journalism
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
DRC	Democratic Republic of the Congo
EITI	Extractive Industries Transparency Initiative
FINTRAC	Financial Transactions and Reports Analysis Centre of Canada
GUARD Wildlife	Global United Action to Reduce and Dismantle Wildlife Crime
ICJ	International Consortium of Investigative Journalists
IIC	Institutional Integrity Committee
NRGI	Natural Resource Governance Institute
OP	Operative paragraph of a UN Resolution
SANParks	South African National Parks
SOP	Standard operating procedure
STR	Suspicious transaction report
UNCAC	United Nations Convention against Corruption
UNODC	United Nations Office on Drugs and Crime
WCO	World Customs Organization

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1 Introduction

At the 8th session of the Conference of the States Parties to the United Nations Convention against Corruption (UNCAC), in December 2019, States Parties adopted, for the first time, a resolution recognising the relationship between corruption and environmental crimes.¹

Resolution 8/12 – *Preventing and combating corruption as it relates to crimes that have an impact on the environment* – is a landmark Resolution.² With its 23 operative paragraphs (OPs), it underlies the importance of addressing corruption linked to crimes that have an impact on the environment. It urges States Parties to prevent, investigate and prosecute corruption offences where they may be linked to crimes that have an impact on the environment. Since then, several related resolutions have been passed (Box 1).

Box 1: A growing body of UN Resolutions addressing the link between corruption and crimes that have an impact on the environment

Following the adoption of Resolution 8/12, several other United Nations processes have adopted a similar approach such as:

- December 2020: Resolution 10/6 – *Preventing and combating crimes that affect the environment falling within the scope of the United Nations Convention against Transnational Organized Crime* – by the Conference of the Parties to the United Nations Convention against Transnational Organized Crime.³
- December 2021: Resolution 76/185 – *Preventing and combating crimes that affect the environment* – by the United Nations General Assembly.⁴
- October 2024: Resolution 12/4 – *Enhancing measures to prevent and combat crimes that affect the environment falling within the scope of the United Nations Convention against Transnational Organized Crime* – by the Conference of the Parties to the United Nations Convention against Transnational Organized Crime.⁵

1 It should be noted that at the 17th meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in 2016, States adopted Resolution 17.6 on *Prohibiting, preventing, detecting and countering corruption, which facilitates activities conducted in violation of the Convention*. This Resolution is nevertheless narrower in scope than Resolution 8/12 of UNCAC in so far as the former focuses on corruption linked to violations of CITES while the latter covers a wider range of crimes that have an impact on the environment.

2 Read the full text of Resolution 8/12 at: <https://www.unodc.org/documents/treaties/UNCAC/COSP/session8/V2006805e.pdf>

3 See: https://www.unodc.org/documents/treaties/UNTOC/COP/SESSION_10/Resolutions/Resolution_10_6_-_English.pdf

4 See: <https://digitallibrary.un.org/record/3954773?ln=en>

5 See: https://www.unodc.org/documents/treaties/COP12/Resolutions/E/Resolution_12_4.pdf

- May 2025: Resolution on *Tackling illicit trafficking in wild fauna and flora, including timber and timber products, the illegal mining of and illicit trafficking in minerals and precious metals, the illicit trafficking in waste and other crimes that affect the environment* – by the UN Commission on Crime Prevention and Criminal Justice (CCPCJ).⁶

It is also worth highlighting Resolution 048/052 on *Crimes that Affect the Environment* adopted by the International Union for Conservation of Nature at its World Conservation Congress in October 2025.⁷

1.1 What are crimes that have an impact on the environment?

“Environmental crimes”, “crimes that affect the environment”, “crimes related to the environment”, “crimes that have an impact on the environment” and “nature crimes” are terms that refer to the same reality: criminal activities that have a detrimental effect on the environment.

These terms are nevertheless rarely defined. When they are, the definitions often revolve around lists of specific offences or categories of offences that harm the environment rather than providing a comprehensive global definition.

For example, Resolution 8/12 does not explicitly specify the meaning or the scope of what constitutes a crime that has an impact on the environment, leaving room for interpretation. It does, however, mention various criminal activities, e.g. illegally obtained natural resources and illicitly trafficked waste.

On the other hand, Resolution 76/185 provides an initial outline of what these crimes entail. According to the Resolution, crimes that affect the environment encompass activities such as “illicit trafficking in wildlife, including, inter alia, flora and fauna as protected by the Convention on International Trade in Endangered Species of Wild Fauna and Flora, in timber and timber products, in hazardous wastes and other wastes and in precious metals, stones and other minerals, as well as, inter alia, poaching”.

The lack of a universally agreed-upon definition reflects the fact that countries have different perspectives on the matter. They have also not yet reached a common understanding of what the term “environment” encompasses. As there is no global consensus on a specific definition, this report will refer to crimes that have an impact on the environment as covering **any offences (e.g. a breach of legislation, an unlawful act or conduct) that result in harm or pose a risk to the environment** such as:

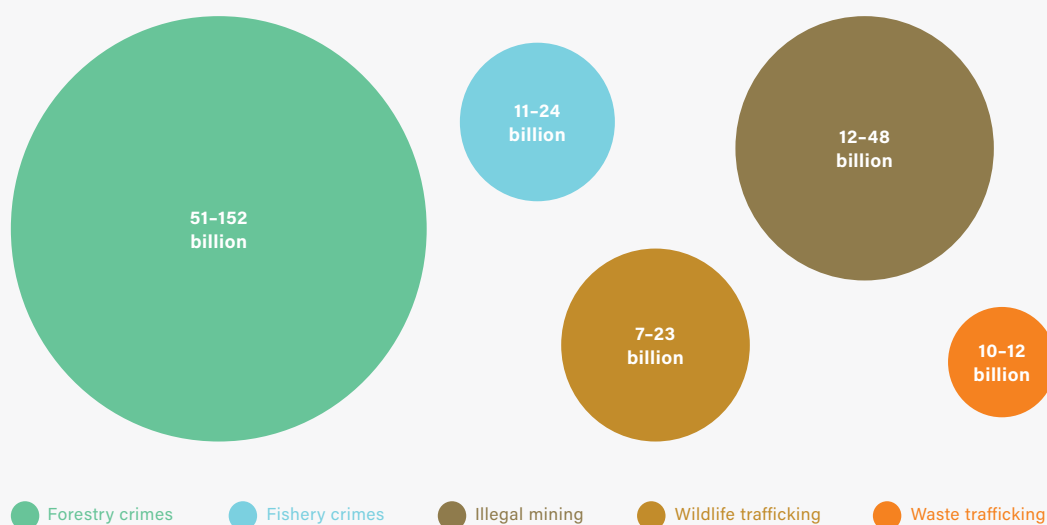
⁶ See: <https://digitallibrary.un.org/record/4091643?ln=en>

⁷ See: <https://iucn-2025.s3.eu-west-3.amazonaws.com/motions/en/052-048-EVOTE-Crimes%20that%20Affect%20the%20Environment-EN.pdf>

- Wildlife trafficking/wildlife crimes
- Crimes in the forestry sector
- Crimes in the fisheries sector
- Illegal mining and trafficking of metals and minerals
- Waste trafficking
- Air, water, noise and soil pollution
- Illegal trade of hydrofluorocarbons or ozone-depleting substances

Crimes that have an impact on the environment are among the most lucrative criminal activities in the world (see Figure 1 for an estimate per crime category). However, finding recent and reliable statistics is challenging. Hence, the true extent of the financial gains made from these crimes is difficult to ascertain. These estimates may well, in fact, underestimate the actual criminal revenues.

Figure 1: Estimated annual profits generated from crimes that have an impact on the environment (in USD)



Sources: *World Atlas of Illicit Flows*, Interpol, RHIPTO, and The Global Initiative against Transnational Organized Crime (2018, 15).

Crimes that have an impact on the environment have disastrous consequences that extend far beyond the illicit profits generated by these activities. They significantly impact, and are detrimental to, the environment, public health and safety, and social and economic development.

For example, the World Bank estimated that governments lose between USD 7 and 12 billion annually in potential tax revenue. Nevertheless, measuring in financial terms the true cost and loss for the environment and human beings is extremely difficult.

1.2 Corruption and crimes that have an impact on the environment

There is no universally agreed-upon definition of corruption. The UNCAC defines corruption by enumerating various categories of offences such as bribery, embezzlement, abuse of functions, trading in influence, money laundering and illicit enrichment. Transparency International's widely used definition describes corruption more broadly as the abuse of entrusted power for private gain.

Corruption plays a crucial role in facilitating crimes that have an impact on the environment. Research and reporting by the United Nations Office on Drugs and Crime (UNODC), civil society organisations, academia and journalists have highlighted the connection between corruption and crimes that have an impact on the environment (see Section 4 and Annex 1). Adjudicated cases also provide information on this issue.

The analysis of this evidence shows that corruption linked to crimes that have an impact on the environment takes many forms. For example:

- bribery to obtain a CITES export permit for poached protected species or to be awarded a waste import permit;
- bribery to prevent inspection or control in a protected area, at border controls, etc.;
- bribery to be released from custody, to avoid prosecution and conviction or to receive minimal sanctions for crimes that have an impact on the environment.

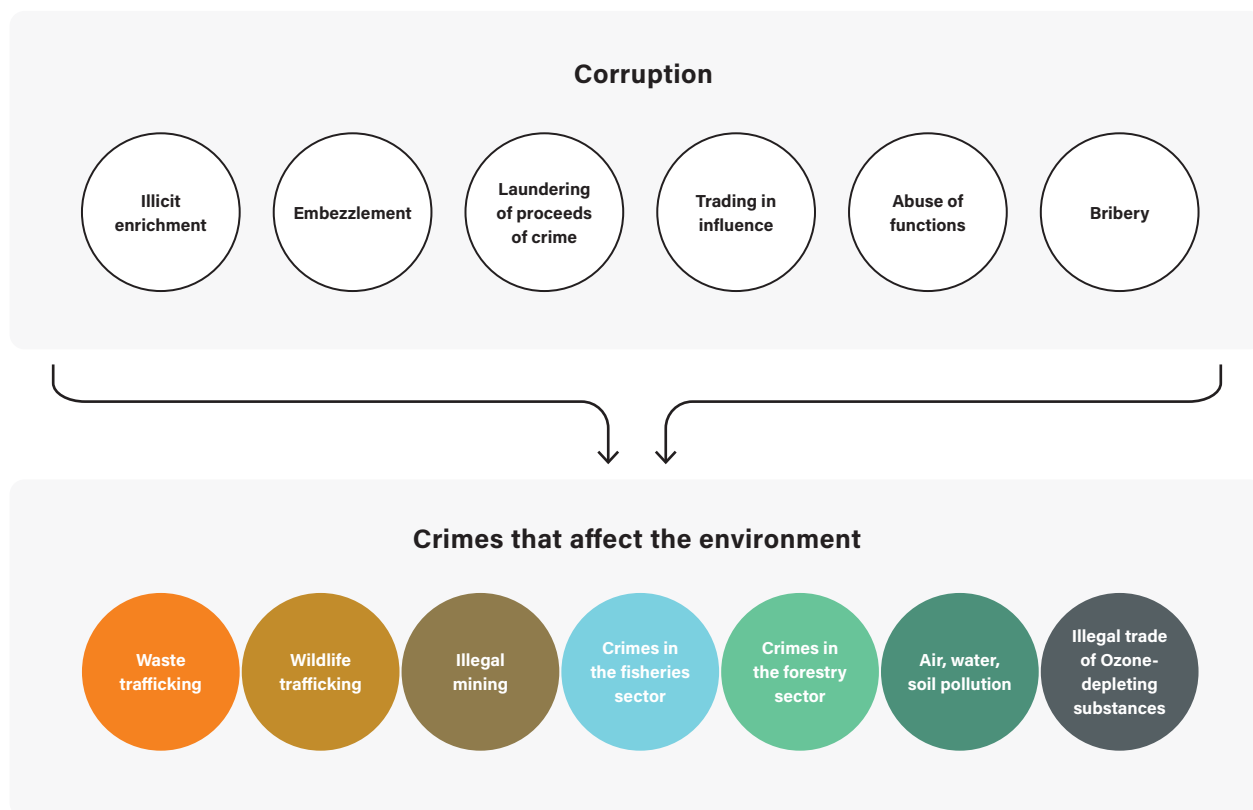
In fact, corrupt practices facilitate all aspects of crimes that have an impact on the environment (Figure 2). They involve multiple actors from public officials to companies and organised crime.

Measuring the scale of corruption linked to crimes that have an impact on the environment is, however, challenging.⁸ This is due to the complexity and clandestine nature of corruption, along with the wide range of corrupt acts involved in enabling crimes that have an impact on the environment.

In 2016, Interpol estimated the global cost of corruption in the forestry sector to be around USD 29 billion (Interpol 2016). To the authors' knowledge, this is the only attempt at measuring corruption as it relates to crimes that have an impact on the environment.

8 In 2023, UNODC published a statistical framework providing guidance to States to detect the presence, measure the magnitude and monitor trends of the different forms of corruption. It includes indicators to collect the needed data. This work could help build evidence on the extent of corruption. It has the potential to be adapted to target corruption as it relates to crimes that have an impact on the environment. See: https://unstats.un.org/UNSDWebsite/statcom/session_54/documents/BG-4d-Framework-E.pdf.

Figure 2: Intrinsic link between corruption and crimes that have an impact on the environment



1.3 Purpose and structure of the report

In 2021, UNODC published an overview of the efforts made by UNCAC States Parties to prevent and counter corruption related to crimes that have an impact on the environment at the national and international levels (UNODC 2021).

Two years later, in 2023, it appeared important to take stock and assess progress ahead of the 10th Conference of the States Parties to the UN Convention against Corruption which took place in Atlanta, Georgia, US, from 11–15 December 2023. Therefore, the Basel Institute on Governance provided a panorama of emerging initiatives across the world since the adoption of Resolution 8/12.⁹ By showcasing the actions taken by UNCAC States Parties as well as civil society, academia and the media, the report aimed at encouraging States to expand their efforts and share their progress.

The present Working Paper builds on our 2023 report. It provides an overview of prevention and enforcement actions, initiatives and measures implemented by UNCAC States Parties in 2024 and 2025 to combat corruption as it pertains to crimes that have an impact on the environment.

Specifically, Section 2 focuses on prevention and Section 3 on enforcement actions. Section 4 underscores the valuable contributions made by non-state actors, in particular civil society organisations, academia and the media in this collective endeavour. Section 5 highlights main trends and marks a crucial

⁹ See: <https://baselgovernance.org/publications/wp-50>.

change from the 2023 report. Indeed, it makes the case that time has come for a paradigm shift moving from “corruption as it relates to crimes that have an impact on the environment” to “corruption that has an impact on the environment”. The Conclusion includes a list of promising initiatives for corruption prevention and enforcement.

Caveat

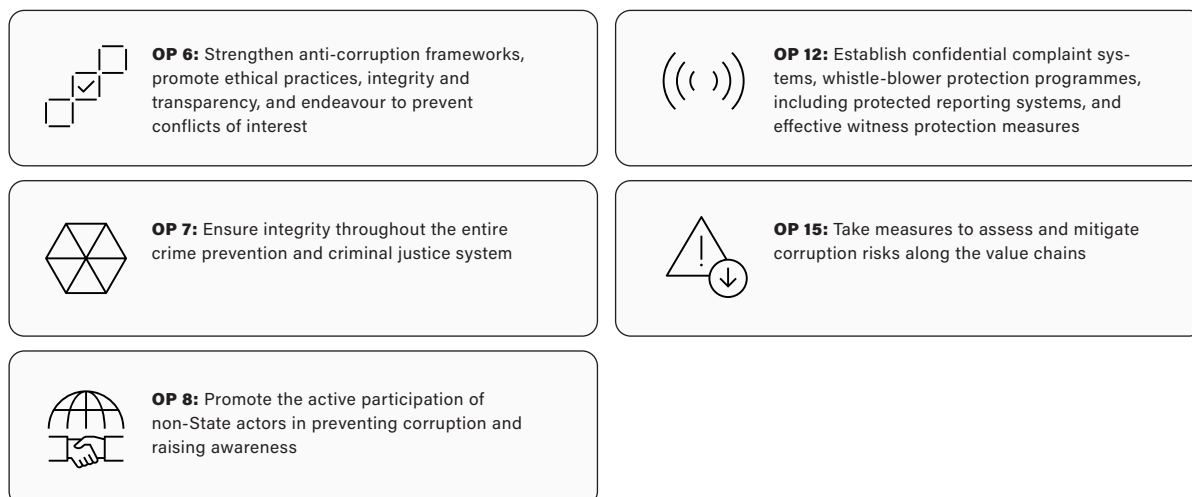
The report is based on publicly available information and relies on desk-based research as well as insights shared by experts interviewed between 16 October and 24 November 2023 as well as between 20 October and 28 November 2025. It does not aim to provide an exhaustive list of actions and measures taken by UNCAC States Parties, civil society organisations, the media and academia to prevent and combat corruption in relation to crimes that have an impact on the environment.

Furthermore, the report does not assess whether these actions can be considered as “good practices”. Given that many of these interventions are still in their early stages of implementation, it would be premature to draw final conclusions. Further research and monitoring are needed to assess the impacts of these measures in addressing corruption linked to crimes that have an impact on the environment.

Nonetheless, the report does present various ongoing and promising initiatives that can serve as inspiration and guidance for States and other stakeholders seeking to explore new strategies and adopt similar approaches to address this critical challenge.

2 Prevention

Figure 3: Operative paragraphs of Resolution 8/12 relating to prevention



Resolution 8/12 includes five operative paragraphs focusing on prevention measures to reduce corrupt practices. This report provides examples of interventions and initiatives taken by States in three areas: promoting ethical practices (OP 6), establishing whistleblowing protection programmes (OP 12) and assessing and mitigating corruption risks (OP 15).

2.1 Promoting ethical practices, integrity and transparency (OP 6)

Strengthening integrity and ethical practices within governmental institutions and agencies tasked with preventing crimes that have an impact on the environment is essential for building strong institutions that can effectively tackle corruption linked to the environment. Over the last six years, States have taken various **initiatives to promote a culture of integrity, in particular by involving leadership and top-level management in the implementation of corruption prevention measures** and by developing public officials' skills and adherence to shared ethical values, standards of conduct and principles.

Since the publication of the report in 2023, **Kenya Wildlife Service**,¹⁰ with support from UNODC, has continued working towards fostering a culture of integrity among its over 6,000 staff members. It has organised eight training sessions on integrity-related issues such as the corruption prevention committees,¹¹ the corruption risk assessment matrix, the integrity office, etc.

¹⁰ The institution is responsible for protecting national parks, national reserves, national sanctuaries, marine national parks and marine national reserves.

¹¹ In 2021, a corruption prevention committee was established at the headquarters and in each of the eight conservation regions to manage risks at the regional level.

In 2024, Kenya Wildlife Service adopted its 2024–2028 strategic plan in which accountability and integrity were defined as two of the organisation's core values. It also created a gift register, setting clear rules on thresholds and types of gifts allowed. Moreover, in July 2025, it updated its corruption risk assessment matrix to reflect the current corruption risks across various departments. The institution also plans to conduct a new corruption perception and experience survey in 2026 to measure progress and changes since 2019.¹² This upcoming survey will help Kenya Wildlife Service to assess the effectiveness of its corruption prevention initiatives.

In addition to Kenya Wildlife Service, other institutions have taken steps to promote ethical practices in Kenya. For example, in 2024, **Kenya Fisheries Service**, with support from UNODC, developed a corruption prevention policy that includes, among other aspects, a code of conduct and a whistleblowing policy. These documents aim to mitigate 30 corruption risks identified and prioritised as “high risks” by Kenya Fisheries Service. They were approved in 2025 by the institution's senior management, its board of trustees, the Ethics and Anti-Corruption Commission and the Public Service Commission. Dissemination activities are planned in Nairobi and along the coastal region.

Authorities in Bolivia, Ecuador and Peru, with support from the Basel Institute on Governance, have promoted transparency and integrity in the forestry and mining sectors with the ultimate goal to induce behaviour change. In total, 6,172 public officials and civil servants from agencies in these three countries have participated in integrity workshops designed to encourage ethical reflection and strengthen public integrity in the exercise of their public functions.

In **Malawi**, a distinct approach to promoting ethical practices, integrity and transparency has been adopted (see Box 2).

Box 2: Malawi – promoting a holistic corruption prevention approach

Since 2019, Malawi has adopted a holistic approach to preventing corruption. Each ministry, department and agency must **allocate a minimum of 1 percent of its annual budget to tackle corruption**.¹³ For example, the Department of Forestry under the Ministry of Natural Resources and Climate Change has dedicated 1 percent of its total annual budget in 2024 to anti-corruption initiatives and has used 75 percent of the amount allocated.



¹² In 2019, Kenya Wildlife Service conducted a corruption perception and experience survey among its staff to assess the perceived level of corruption and experience of staff across different regions. Overall, employees responded that corruption is perceived as sometimes acceptable. To address the survey findings, Kenya Wildlife Service revised its corruption prevention policy and code of conduct.

¹³ Although the instruction to allocate 1 percent of funding to anti-corruption activities was already provided in 2014, it was re-emphasised in 2021. At the end of each financial year, the Anti-Corruption Bureau assesses whether institutions have dedicated and used the appropriate budget for anti-corruption initiatives. Sanctions can be imposed when efforts are deemed insufficient.

In addition, each ministry, department and agency must **establish an Institutional Integrity Committee (IIC)** to promote integrity, transparency and accountability and to improve service delivery.

The **Department of Forestry** established its IIC in 2023. Since then, its members have participated in various training sessions on corruption-related issues with support from the Malawi Anti-Corruption Bureau and the Basel Institute on Governance. IIC members have subsequently conducted awareness sessions in six locations across the country, reaching 233 staff members. In collaboration with the Anti-Corruption Bureau, the IIC has also developed a corruption prevention policy, including a code of ethics and an awareness brochure, available in English and in Chichewa.

The **Department of National Parks and Wildlife**, too, has established an IIC in 2023 with support from the Anti-Corruption Bureau, the Basel Institute on Governance and UNODC. Its IIC members have taken part in training sessions, including on conducting initial corruption investigations and on public procurement.

The Department of National Parks and Wildlife has also consulted 500 staff members in the Central, Northern, Upper-Shire and Lower-Shire divisions to develop a corruption prevention policy which reflects the insights, experiences and day-to-day realities of the Department.¹⁴

Furthermore, the Department of National Parks and Wildlife adopted a code of ethics in 2023. To increase knowledge of the ethics code among staff and disseminate it across the different parks and border posts, the department used printed posters and a short video shared via WhatsApp.

The **Anti-Corruption Bureau** has played an instrumental role to create a culture of integrity within the Department of Forestry and the Department of National Parks and Wildlife.

¹⁴ The corruption prevention policies of the Department of Forestry and the Department of National Parks and Wildlife are in their final stage of approval.

2.2 Establishing whistleblower protection programmes (OP 12)

Whistleblowers have played a crucial role in exposing corruption and crimes that have an impact on the environment, but they often face retaliation for their actions. **An appropriate legal framework and effective whistleblowing protection programmes are crucial** not only to enable individuals to safely report wrongdoing, but also to deter unethical behaviours.

While article 33 of UNCAC provides that appropriate measures shall be incorporated to grant protection to those who report corruption, many countries do not have dedicated legislation. When they do, the scope, the forms of protection and the effectiveness of the laws vary widely (Feinstein, Devine et al. 2021). It should be noted that these laws do not specifically focus on corruption or on crimes that have an impact on the environment.

In addition to adopting a dedicated legal framework, it is essential to establish effective whistleblowing protection programmes.

In Kenya, to encourage the reporting of corruption, **Kenya Wildlife Service**, with support from UNODC, developed an automated integrity management system. An **integrity office** was established in 2023 and has been operational since 2024. Composed of two staff members, the office is responsible for receiving, analysing, processing and monitoring corruption reports through a separate server as well as ensuring that appropriate actions are taken. Complaints can be submitted via a dedicated hotline, by email, via integrity boxes and online. Each complaint is assigned a unique number to ensure anonymity.

Between July 2024 and July 2025, the integrity office received 87 alerts, of which 57 have been closed and 30 are still under enquiry, a result that highlights the success of the whistleblowing programme. Based on employee feedback and the upcoming whistleblowing legislation, Kenya Wildlife Service is reviewing its whistleblowing policy to further strengthen, among other aspects, confidentiality and anonymous reporting.

For whistleblowing protection programmes to be effective, they must be widely known and easily accessible.

In South Africa, **South African National Parks** (SANParks), with support from UNODC, developed an awareness-raising campaign and communication strategy to promote the whistleblowing hotline available for reporting corruption and wrongdoings. Launched in November 2024, the campaign targeted both SANParks employees and external stakeholders and led to an increase in the number of alerts received (from 44 reports for the year 2023–2024 to 65 in 2024–2025).

In **Bolivia**, a similar approach was implemented with UNODC's support. In 2025, the **Authority of Forests** within the Ministry of Environment prepared and distributed awareness-raising materials (handouts, roll-ups and reporting boxes) with the objective of enhancing public engagement and increasing the number of reported cases of corruption.

2.3 Assessing and mitigating corruption risks (OP 15)

Corruption risk assessments enable institutions to understand the wide range of corruption vulnerabilities linked to crimes that have an impact on the environment, **map the corruption risks and associated mitigation measures, assign responsibility** for implementing mitigation measures and **outline how progress will be monitored**.

Since 2019, various methods and approaches for assessing corruption risks have been developed both at sectoral (e.g. forestry, fisheries or mining) and institutional levels. For instance, UNODC designed methodologies for the fisheries sector¹⁵ and for wildlife management authorities¹⁶. The Basel Institute on Governance designed the Map, Characterise, Assess and Recommend (MCAR) method for law enforcement and criminal justice processes.¹⁷

Over the last six years, multiple countries have conducted corruption risk assessments. UNODC is supporting six wildlife authorities, six forest authorities, two fisheries authorities and one environmental authority from eight countries to assess their corruption risks.¹⁸

For example, in **South Africa, the Department for Forest, Fisheries and Environment** conducted a corruption risk assessment in October 2024. The Department, then, organised a strategic management anti-corruption workshop in May 2025 to embed integrity measures into routine operations and accountability systems. With UNODC's support, the Fisheries branch developed a series of standard operating procedures (SOPs) related to the monitoring, control and surveillance functions, integrating anti-corruption safeguards under each SOP. As a next step, the Fisheries branch will review the workplans of different job categories to align them with the new SOPs and ensure that anti-corruption measures are streamlined.

The Basel Institute on Governance has been working in partnership with ministries and agencies in six countries to design and implement corruption risk assessments (see also Box 3).¹⁹ In some cases, these assessments refer to widely used international standards. One such example is the development of corruption risk management plans for the timber value chain – based on ISO 31000 on risk management and ISO 37001 on anti-bribery management systems – by the **Forest and Land Inspection and Social Control Authority in Bolivia** and the **Ministry of Environment and Energy in Ecuador** in 2024.²⁰

15 See: https://www.unodc.org/documents/Rotten_Fish.pdf

16 See: https://www.unodc.org/documents/Wildlife/19-08373_Scaling_Back_Corruption_ebook.pdf

17 See: <https://www.worldwildlife.org/pages/tnrc-guide-to-conducting-corruption-risk-assessments-in-a-wildlife-law-enforcement-context>

18 Bolivia, Kenya, Malawi, Mozambique, Nigeria, Solomon Islands, South Africa and Uganda.

19 Bolivia, Ecuador, Indonesia, Malawi, Peru and Ukraine.

20 Corruption risk assessments were conducted in 2023.

While assessing corruption risks is essential, **implementing the measures identified in the action plans is even more important for effective corruption prevention.** With support from the Basel Institute on Governance, the Forest and Land Inspection and Social Control Authority in Bolivia reached implementation levels of 82 percent and the Ministry of Environment and Energy in Ecuador 79 percent by the end of the first year of implementation.²¹

Corruption risk assessments are often carried out at the national level, but in some cases they are developed **at the regional level** to better reflect local contexts and territorial vulnerabilities. This approach has been adopted **in Peru** by the Regional Government of San Martín, through its Regional Environmental Authority, and by the Regional Government of Ucayali, through its Regional Forest and Wildlife Management Office, with support from the Basel Institute on Governance.

This process resulted in the approval of a corruption risk management plan for the issuance of forest transport guides in December 2024. The plan includes control measures, the institutions responsible for implementation and timelines. Implementation is ongoing, with measures currently focusing on satellite monitoring in San Martín and on the transfer of seized or abandoned forest products in Ucayali.



Box 3: Ukraine – continued anti-corruption efforts despite the war

Historically, the forestry sector in Ukraine has been one of the areas of the national economy most exposed to systemic integrity risks. In 2023, a report published by the Basel Institute on Governance identified institutional gaps that enable corruption schemes and illegal logging.²²

Following the report's findings, the National Agency on Corruption Prevention, the Prosecutor General's Office of Ukraine, the Basel Institute on Governance and WWF-Ukraine conducted an in-depth analysis of corruption risks in the forestry sector and proposed mitigation measures.²³

The outlined reforms are demanding in any context. For a country at war and given the difficult conditions under which authorities must operate, these reforms are particularly challenging. However, safeguarding its forestry sector through strengthened governance is a crucial priority for post-war economic reconstruction.

21 The measures included defining technical criteria to prioritize samples for the authorization, control and oversight of timber harvesting and commercialization, regulatory proposals intended to strengthen satellite monitoring and surveillance functions in order to improve control, sanctioning and the prevention of crimes and harm to Bolivia's forests. In addition, the Forest and Land Inspection and Social Control Authority implemented a communication strategy with an intercultural approach regarding priority forest procedures for campesino, intercultural and Indigenous communities.

22 See: <https://baselgovernance.org/publications/deepdive1-ukraine>

23 See: <https://nazk.gov.ua/pdfjs/?file=/wp-content/uploads/Pages/cb/69cb695ed153d5cd51d71cec4d58d1eb9cc2a410cb272f91bc43424e9fb6494523643683.pdf> and <https://baselgovernance.org/publications/corruption-risks-forestry-sector-ukraine>

Law enforcement is pursuing numerous irregularities in Ukraine's forest management. To prevent such irregularities from occurring in the first place, corporate governance must be strengthened and stronger internal control measures must be built. These are ongoing priorities that need to be augmented with greater transparency measures to enable independent oversight of the industry.

Box 4: Fostering peer-to-peer learning exchanges on corruption prevention

In 2024, **Bolivia, Ecuador and Peru** met to review progress in implementing their corruption risk management plans and to exchange lessons learned. Field visits allowed participants to observe practical control tools. An example is the low-cost digital microscope used in San Martín to verify timber species, illustrating that corruption prevention can be effective even without substantial financial resources. The meeting also strengthened regional cooperation among institutions, helping to build a collaborative network dedicated to promoting more transparent and sustainable forest management practices.

In addition, the Basel Institute on Governance organised a workshop in 2024 on corruption risk management in the timber value chain, attended by representatives from forest authorities of Bolivia, Ecuador and Peru, as well as regional governments and Indigenous leaders. A second edition is taking place at the time of writing this report.

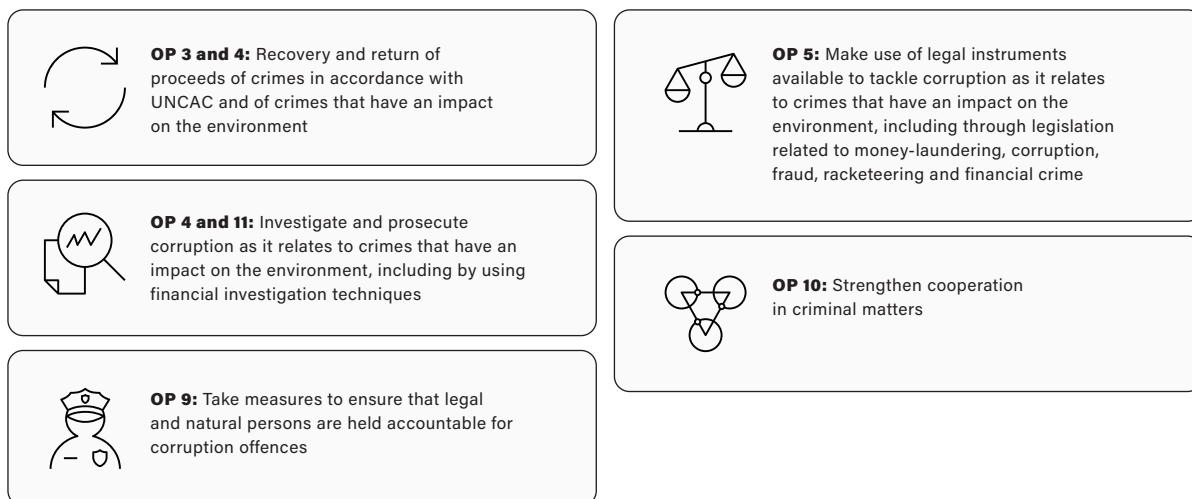
Furthermore, the Forest and Land Inspection and Social Control Authority in Bolivia and the Basel Institute on Governance held an event on "Satellite Monitoring for Crime Prevention and Forest Protection in Bolivia" in March 2025. This event brought together expert agencies from Bolivia, Ecuador and Peru to share knowledge and reflect on ways to strengthen satellite monitoring for the prevention of environmental crimes and acts of corruption in Bolivia's forests. As a result, participants recommended developing technical solutions, algorithms and institutionalised procedures to process, validate and use satellite information as evidentiary input in administrative and criminal proceedings.

Peer-to-peer learning exchanges have also been organised in other regions. For instance, the **Nigeria Park Service** (in 2024) and the **Ministry of Water and Environment of Uganda** (in 2025) undertook a "study tour" to meet with Kenya Wildlife Service and Kenya Fisheries Service, in collaboration with the Kenyan Ethics and Anti-Corruption Commission and UNODC.

The visits aimed to enhance knowledge and awareness of good practices related to corruption risk assessments in Kenya, learn how to establish corruption prevention or management committees at a sectoral level, share practical experiences, build lasting relationships with other countries and strengthen regional collaboration.

3 Enforcement

Figure 4: Operative paragraphs of Resolution 8/12 relating to enforcement



Resolution 8/12 puts a strong emphasis on enforcement actions. In particular, UNCAC States Parties are urged to take actions to investigate, prosecute, hold accountable legal and natural persons for corruption offences, strengthen cooperation, and recover and return proceeds of crimes. Accessing information on case laws is difficult (Box 5). Nevertheless, the report highlights interesting and promising enforcement approaches.

Box 5: Absence of publicly available statistics does not imply an absence of cases

The lack of publicly available statistics on investigations and convictions, coupled with the absence of systematic and specific data collection by countries on cases of corruption linked to crimes that have an impact on the environment, poses a challenge in assessing progress and determining the number of ongoing or adjudicated cases since 2019.²⁴ However, the absence of publicly available statistics should not be seen as an indication that corruption cases related to crimes that have an impact on the environment are non-existent.

²⁴ In its 2021 report, UNODC indicates that 18 States reported cases of corruption related to crimes that have an impact on the environment with a total of 57 examples provided, but the report does not specify the dates of the cases.

Moreover, while law enforcement authorities around the world have taken enforcement actions against crimes that have an impact on the environment, the degree of focus on potential corrupt practices in these cases varies. In other words, **the absence of corruption in reported cases of crimes that have an impact on the environment does not necessarily mean that there was no corruption**. Rather, it suggests that corruption might not be explicitly addressed in the reported cases. The actual number of corruption incidents linked to crimes that have an impact on the environment could, in fact, be much higher.

Additionally, States rarely disclose information about ongoing investigations due to confidentiality reasons. Hence, there is likely a more extensive number of cases involving corruption linked to crimes that have an impact on the environment than what is indicated in this report.

3.1 Prosecuting corruption cases and holding legal and natural persons accountable (OP 4, 9, 11)

Since 2019, law enforcement authorities have investigated and prosecuted individuals and companies for corruption offences linked to crimes that have an impact on the environment. There is anecdotal evidence in countries such as Cameroon, Kenya, Indonesia, Malawi, Namibia and The Gambia (see Box 6 on Namibia).

When convicted, **individuals and companies face imprisonment, fines and confiscation of assets** (see Section 3.3 below). We are also starting to see specific financial penalties included in the sentencing to compensate for the environmental harm done and conduct restoration actions (see Annex 2 on Indonesia and Section 4.4 on strategic litigation by civil society). However, the **number of investigations and prosecutions remains low** compared to the number of suspected corruption incidents reported by media and civil society organisations.

Box 6: Namibia – bringing high-level public officials to justice

In December 2019, media outlet Al Jazeera exposed extensive corrupt practices in Namibia's fishing industry following the publication of over 30,000 documents by WikiLeaks from whistleblower Jóhannes Stefánsson (Al Jazeera 2019). This scandal became known as the **Fishrot case** or Fishrot scandal.

This is the first transnational corruption case in the fisheries sector.²⁵ It involves public officials in Namibia (including the former Attorney General, who at the time of his arrest was the Minister of Justice, and the former Minister of Fisheries and Marine Resources), a fishing company headquartered in Iceland, a bank located in Norway and a total of 27 jurisdictions involved at various levels.

The investigation, prosecution and trials are taking place in Namibia, where the corruption offence took place. The suspects are indicted for racketeering, bribery, money laundering and tax evasion. International cooperation through mutual legal assistance contributed to the successful conclusion of the investigation. Law enforcement authorities did not face political interference despite the fact that high-level public officials were charged with corruption. Witnesses are also determined to testify notwithstanding the high visibility and stakes of the case. Paulus K. Noa, Director-General of the Namibian Anti-Corruption Commission, refers to the case as "a true testimony of the Government of Namibia's commitment to fighting corruption and organised crimes".

While the trial was expected to open in 2024, the case has since been postponed and delayed due to the defendants' various applications. Though the final outcome is uncertain, the case is an illustration of a successful enforcement action in a grand corruption case.

25 Public officials and a multinational company are accused of corruption linked to fish quotas. USD 650 million were flagged as suspicious by Namibia's Financial Intelligence Unit.

3.2 Using anti-money laundering legislation and financial investigation techniques (OP 11)

Financial investigations – also known as “follow-the-money” methods – are instrumental to get an understanding of the locations, the networks of actors and assets involved, the movement of funds and how the criminal activities are financed (Reid, Parry-Jones and Keatinge 2020). They are necessary not only to combat crimes that have an impact on the environment, but also for exposing corrupt allies and gathering evidence to initiate corruption cases linked to these crimes.²⁶

It is also important that **national legal frameworks recognise crimes that have an impact on the environment as a predicate offence** in order to mobilise anti-money laundering legislation to tackle these crimes.

Several countries, including Canada, Colombia, China, Kenya, Hong Kong, Indonesia, Malawi, Mozambique, South Africa,²⁷ Thailand and the US, have **applied an anti-money laundering approach to wildlife trafficking** (Hsu 2025). For instance, in at least eleven cases since 2019, the US indicted individuals for money laundering in connection with wildlife crimes.

One such example is Bhagavan Doc Antle who pleaded guilty in November 2023 to money laundering and to a conspiracy to violate the Lacey Act (U.S. Department of Justice 2023). He was sentenced to 12 months in prison, fined USD 55,000 and ordered to forfeit three chimpanzees and more than USD 197,000 to the **US** government (U.S. Department of Justice 2025). Bhagavan Doc Antle used bulk cash payments to hide the transactions and requested that payments for endangered species be made to his non-profit so they could appear as “donations” (U.S. Department of the Treasury 2024).

In **Mozambique**, Chabane Assuba, a broker, was sentenced in 2024 to 30 years in prison and fines equivalent to two years for illegal possession and storage of wildlife products, criminal association and money laundering (English.news.cn 2024). More than 600 kg of products of prohibited species (such as lion bones, elephant bones and ivory tusks) were found at his residence.

Anti-money laundering legislation and “follow-the-money” methods can be applied to all crimes that have an impact on the environment and not only to wildlife crimes. Some countries have taken this approach (Box 7). In **Brazil**, federal authorities launched an investigation into the laundering of more than USD 16.4 million of

26 It should be noted that few countries have conducted money laundering risk assessments dedicated to corruption and crimes that have an impact on the environment. There is, however, a need to better understand what the risks are to adopt appropriate measures and responses. In addition, crimes that have an impact on the environment are often not designated as a predicate offence for money laundering (FATF 2021).

27 According to the South African Anti-Money Laundering Integrated Task Force, 439 suspicious transaction reports related to illegal wildlife trade were reported between 1 January 2022 and 1 December 2024. Several investigations led to the prosecution of money laundering associated with wildlife crimes. See: <https://www.fic.gov.za/wp-content/uploads/2025/10/EWG-report-Updated-IWT-report-2025.pdf>

illegally mined gold (Pope 2023). A shell company supposedly trading hospital supplies is alleged to have laundered over USD 12.3 million in gold.

In 2024, the **Spanish Guardia Civil** launched Operation Dashboard, with support from the European Anti-Fraud Office, against individuals who were introducing hazardous waste into the EU. They are under investigation for alleged crimes against natural resources and the environment, falsification of certificates, money laundering, tax fraud and membership in a criminal group (OLAF 2024).

Since the adoption of Resolution 8/12, there are nevertheless very limited examples of financial investigations targeting *corruption* linked to crimes that have an impact on the environment (see Annex 2 on Indonesia).²⁸



Box 7: Indonesia – Environmental Ministry achieves first conviction for money laundering linked to illegal logging²⁹

In 2022, an Indonesian Court sentenced a businessman named Supono for illegal logging and then, in 2024, for money laundering. In both cases, he was sentenced to prison and ordered to pay a fine. Financial investigations revealed that the defendant earned approximately USD 127,000 from illegally sourced timber from Alas Purwo National Park and several other regions across Indonesia.

Supono illegally traded rosewood with two sawmill companies. To conceal the illicit origin of the proceeds, the payments were channelled through his son's bank account. Supono then transferred the funds back to his own bank account in smaller transactions, integrating them with money he had loaned from the bank and using the illicit funds to pay back the loan.

This is a landmark conviction. It is notable because the investigations were led by investigators from Indonesia's Ministry of Environment and Forestry. Until a Constitutional Court's ruling in 2021, only a limited number of law enforcement authorities could use the provisions set in the 2010 Anti-Money Laundering Law No. 8/2010. The court's 2021 decision extended the power to pursue money laundering offences

28 In the US, the Financial Crimes Enforcement Network analysed suspicious transaction reports (STRs) reporting wildlife trafficking, filed between January 2018 and October 2021. It found that out of 212 STRs, 21 STRs (10 percent of the cases) identified a possible link between corruption and wildlife trafficking while in 80 percent of the STRs, a money laundering activity was reported.

29 The example in Box 7 is based on the Policy Brief 12, published by the Basel Institute on Governance: <https://baselgovernance.org/publications/cs-12>

linked to crimes that have an impact on the environment to investigators from natural resources and environmental authorities. This is the first money laundering conviction achieved by the Ministry of Environment's investigators.

While the amount of money laundered in this case and the imposed fines (approximately USD 29,900 for illegal logging and USD 3,000 for money-laundering) were relatively modest, the case has opened the door to tackling more complex, high-value cases in the future.

3.3 Seizing and confiscating assets (OP 3 and 4)

Recovering assets (such as vehicles, houses or bank accounts) in a corruption or money laundering case linked to crimes that have an impact on the environment is crucial. Asset recovery is a powerful deterrent. It can mean **seizing assets that were bought with illicit profits** as well as **seizing the instrumentalities of the crimes** (the trucks, the boats or machinery used in illegal activities), and therefore directly disrupts operations of the networks of actors engaged in corruption and crimes that have an impact on the environment.

One example can be found in **Mozambique**. In 2024, two rhino horn traffickers – Simon Valoi and Paulo Zucula – were convicted for illegal wildlife trade, criminal association and money laundering (Wildlife Justice Commission 2024). Simon Valoi was sentenced to 27 years in prison, the confiscation of assets worth approximately USD 140,625, and a USD 170,000 fine in compensation to the State. Paulo Zucula received a 24-year prison sentence, a USD 62,500 fine in compensation to the State and USD 265,625 of his assets were confiscated.

In October 2025, the Economic and Financial Crimes Division of the High Court of **Zambia**, a civil jurisdiction, ordered the confiscation of assets valued at more than USD 1 million to the benefit of the State (WCP News). These assets are tied to an illegal logging operation, including offices, trucks and trailers, over 1,900 logs, fork lifter and industrial machinery.³⁰ The National Prosecution Authority used non-conviction based forfeiture law.

In its judgement, the High Court of Zambia sent a clear message that owners must ensure their assets “will not be used as instrumentalities in the commission or furtherance of economic and financial crimes.” It also added that “Courts have a duty not to embolden people to engage in or perpetrate illegal logging but to protect the country’s Natural Resources for future generations.”

Once confiscated, assets could be used to compensate, restore and/or repair the harm done. However, tracing, seizing and definitive confiscation of illicit assets related to corruption and crimes that have an impact on the environment are not yet systematic.

30 See: <https://www.facebook.com/100089012211893/posts/796811556629244/>

3.4 Strengthening cooperation (OP 10)

Enforcement actions to address corruption as it relates to crimes that have an impact on the environment require significant time and resources (for timely detection and adequate investigation), specialised knowledge and the involvement of multiple agencies or authorities.³¹ Although the assistance and dedicated expertise of the respective agencies is generally needed, cooperation between the anti-corruption agency, the financial intelligence unit, prosecutors, police, customs and the agency in charge of the environment is often ad hoc at best.

Yet, multi-agency cooperation is a crucial step to tackle corruption linked to crimes that have an impact on the environment and dismantle criminal networks. Over the last six years, countries have worked to develop and improve inter-agency coordination at the country level and international level.

National multi-agency and interdisciplinary collaboration

States are more and more establishing **multi-agency and interdisciplinary task forces within their own countries** to tackle corruption linked to crimes that have an impact on the environment (Box 8).

For instance, in **Kenya**, under the leadership of the Ethics and Anti-Corruption Commission, an inter-agency arrangement was established comprised of Kenya Wildlife Service, the Assets Recovery Agency, the Directorate of Criminal Investigations and the Kenya Revenue Authority. The institutions meet regularly and have set specific targets to be achieved for the fiscal year July 2025 – July 2026.

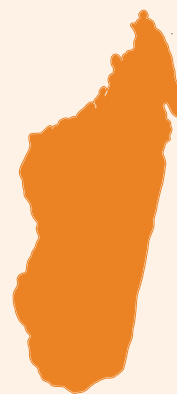
Proactive law enforcement cooperation combined with **partnerships with civil society organisations and/or the private sector** is also essential for greater impact.

For example, the **Nigeria Customs Service** and **Wildlife Justice Commission** have been collaborating since 2021 to dismantle criminal networks involved in the trafficking of ivory and pangolin scales. This collaboration has produced tangible results: 42 suspected wildlife traffickers were arrested with 12 convictions secured, 13 major criminal networks have been disrupted, and over 25 tonnes of pangolin scales and more than one tonne of ivory have been seized (Wildlife Justice Commission 2025b). Moreover, there have been no significant pangolin scale seizures at seaports or airports for more than three years (Wildlife Justice Commission 2025a). This suggests that criminal networks have been severely disrupted.

While this successful partnership does not focus on *corruption* linked to crimes that have an impact on the environment, it underscores the importance of cooperation, including with civil society organisations, to effectively halt criminal activities.

31 For a comprehensive list of challenges, see Table 4 of UNODC 2021 report.

Box 8: Madagascar – national and international inter-agency cooperation was key to dismantling a wildlife trafficking network³²



In May 2024, Thai customs authorities seized more than 1,000 radiated tortoises and 48 live lemurs from Madagascar (protected under CITES) at Suvarnabhumi International Airport in Bangkok, with support from Interpol, the Wildlife Justice Commission, the U.S. Fish and Wildlife Service and UNODC.

While the case in Thailand is still ongoing, a positive outcome has already been achieved in Madagascar. Following the criminal complaint filed by the Malagasy Ministry of Environment and Sustainable Development in Madagascar, the investigation led to the identification of Malagasy, Thai and Burmese suspects. In addition to pursuing the trafficking offences, the **Malagasy authorities adopted a “follow-the-money” approach, bringing together relevant national authorities** with support from the Basel Institute on Governance.

On 8 May 2025, for the first time in Madagascar, the specialised anti-corruption court convicted 12 individuals for smuggling protected species, money laundering and criminal conspiracy. The defendants received prison sentences of up to ten years. They were ordered to pay a customs fine of over EUR 5 million and EUR 2.5 million in damages to the Ministry of Environment and Sustainable Development. Bank accounts, vehicles and motorcycles were also confiscated.

The Thai and Burmese nationals involved were tried in absentia (while on bail pending their related trial in Thailand), and international arrest warrants were issued. Moreover, the species seized in Thailand were safely returned to Madagascar thanks to successful international cooperation.

This case demonstrates the key role of inter-agency cooperation at the national and international levels as well as the effectiveness of applying money laundering and related criminal provisions to address crimes that have an impact on the environment. This approach is expected to be duplicated in ongoing and future cases in Madagascar.

32 This box is based on drafts for a forthcoming Policy Brief by the Basel Institute on Governance.

Regional and international cooperation

Cross-border collaboration among law enforcement authorities is instrumental, as seen in the Fishrot case (Box 6). International cooperation takes many forms, from **formal mutual legal assistance requests to information sharing between financial intelligence units through the Egmont Group, public-private partnerships** (Box 9) and **informal exchanges** facilitated by dedicated networks.

Coordination and support from organisations like UNODC, Interpol, Europol and the World Customs Organization (WCO) are essential.

The publication of notices such as Interpol's red, silver or purple Notices helps States to find criminals and to better understand the modus operandi and methods used by criminals.

Project TENTACLE, an initiative led by WCO since 2018 and funded by the U.S. Bureau of International Narcotics and Law Enforcement Affairs, places emphasis on collaboration between customs services and both financial intelligence units and police services to dismantle criminal networks.

The Informal Law Enforcement Network – an initiative launched by UNODC, WCO, OECD and Interpol in 2020 – provides a forum for government representatives, civil society organisations and the private sector to meet twice a year to discuss and facilitate the exchange of information on gold trafficking.

Since the publication of the Seedlings of hope report in 2023, several **joint cross-border law enforcement operations** were conducted to combat crimes that have an impact on the environment. Operation Thunder³³ and Operation Panthera Onca³⁴ are examples from 2024.

In 2025, Operation Green Shield,³⁵ led by the United Arab Emirates, Brazil, Colombia, Ecuador and Peru, targeted activities linked to illegal mining, wildlife trafficking, illegal logging, fuel smuggling and illegal waste across the Amazon. The operation was part of the International Law Enforcement Initiative for Climate Change launched in February 2023.³⁶

A new initiative, GUARD Wildlife (Global United Action to Reduce and Dismantle Wildlife Crime), was launched in February 2025 to enhance cooperation at the national, regional and international levels in order to tackle organised criminal networks involved in wildlife trafficking. It will be implemented by the International Consortium on Combating Wildlife Crime with funding from the European Union.

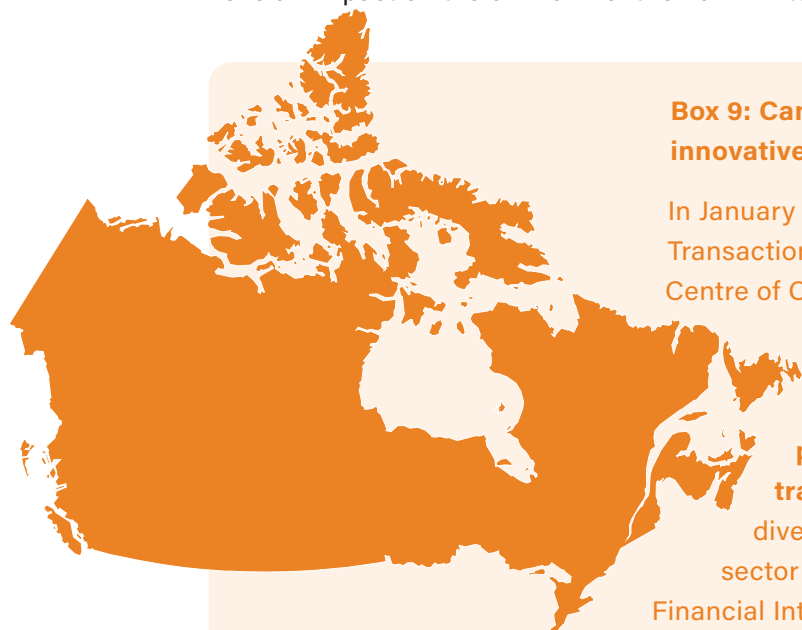
33 The initiative was established in 2017 and several operations have since been conducted. See: <https://www.interpol.int/en/News-and-Events/News/2025/Nearly-20-000-live-animals-seized-365-suspects-arrested-in-largest-ever-wildlife-and-forestry-operation>

34 See: <https://www.interpol.int/en/News-and-Events/News/2024/Paraguay-leads-tri-border-clampdown-on-illegal-deforestation>

35 See: <https://moi.gov.ae/en/media.center/news/070825n02.aspx>

36 See: <https://moi.gov.ae/en/about.moi/Initiative/040725m01.aspx#:~:text=The%20international%20law%20enforcement%20initiative,resulted%20in%20the%20launch%20of>

Despite these many initiatives, multi-agency and interdisciplinary collaborations at the national, regional and international levels on *corruption* linked to crimes that have an impact on the environment remain limited.



Box 9: Canada – Project Anton, an innovative public-private partnership

In January 2023, the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC) launched **Project Anton to increase information sharing and tackle money laundering of proceeds from illegal wildlife trade**. It brings together a diverse group of public and private sector organisations such as the UK Financial Intelligence Unit, the South Africa Anti-Money Laundering Integrated Task Force, United for Wildlife, Scotiabank and Wildlife Justice Commission.

Through the partnership, an “operational alert” was issued to support financial institutions in recognising suspicious financial transactions.³⁷ In a span of two years, FINTRAC received over 150 suspicious transaction reports (STRs) with a total value equivalent to CAD 200 million – a significant rise compared to less than 200 STRs received in the ten years prior to Project Anton.

The initiative also enabled FINTRAC to increase the amount of intelligence it is sharing with domestic and international authorities (Countering Environmental Corruption Practitioners Forum 2025).

3.5 Making use of legal instruments available (OP 5)

Resolution 8/12 encourages States to make use of legal instruments available to tackle corruption as it relates to crimes that have an impact on the environment, “including through legislation related to money-laundering, corruption, fraud, racketeering and financial crime”

37 See: <https://fintrac-canafe.canada.ca/intel/operation/oai-wildlife-eng.pdf>

In the previous sections, we have seen that law enforcement authorities have been using anti-money laundering legislation to tackle this issue. Complementary approaches are possible:

- **Imposing sanctions and visa bans** on individuals and companies involved in corruption linked to crimes that have an impact on the environment.
- **Using non-conviction based confiscation**, i.e. the possibility to confiscate assets derived from criminal activity without the need for a criminal conviction (Spicer and Grossmann 2022).
- **Applying social re-use of seized and confiscated assets** for the benefit of citizens and the planet. The assets could be allocated to law enforcement involved in cases of corruption and crimes that have an impact on the environment or to anti-corruption and conservation civil society organisations, or used to restore nature (UNICRI 2025).
- **Mobilising illicit enrichment or unexplained wealth laws** (Dornbierer 2021).
- **Using innovative legal instruments such as the presumption of money laundering**, a mechanism adopted in France in 2023 to combat the laundering of the proceeds of crime (Brimbeuf and Bornstein 2023).
- **Making the most of beneficial ownership and other available registers** (asset declaration databases, land register, company register, procurement monitoring systems, etc.) to conduct criminal investigations.

Other avenues to explore include tax-related laws, corporate due diligence legislation, misconduct and misstatements in relation to environmental, social and governance (ESG) considerations, and remedies via civil proceedings.

4 Civil society and the media as key actors

In its preamble, Resolution 8/12 highlights “the important role of the media, civil society, academia and private sector entities in the prevention of and the fight against corruption as it pertains to crimes that have an impact on the environment”

Over the past six years, the media and civil society have played an essential role, despite facing many challenges. The space for civil society is shrinking worldwide. 72.4 percent of the global population now live in countries classified as closed or repressed (CIVICUS Monitor 2024). Press freedom is also declining in many regions. For the first time in the history of the World Press Freedom Index, Reporters Without Borders classified the global state of press freedom as a “difficult situation”.³⁸

The following section looks at four areas where the media and civil society have been a driving force.

4.1 Raising awareness through investigative journalism

Journalists and media organisations have played a crucial role in **exposing the links between corruption and crimes that have an impact on the environment**. Major international media outlets such as *Mongabay*, *Cenozo*, *InSight Crime*, *The Gecko Project*, the *International Consortium of Investigative Journalists*, and *Organized Crime and Corruption Reporting Project* have documented how corruption enables environmental crimes across the globe. For example, through Journalismfund Europe cross-border investigations have documented cases of waste trafficking, illegal logging, eels trafficking and exotic birds trafficking, exposing Europe’s role.³⁹

National media have also contributed to **raising awareness** with support from organisations like the Thomson Reuters Foundation and the Internews’ Earth Journalism Network (Box 10). In 2024, *The Africa Report*, together with the Pulitzer Center Rainforest Investigations Network, published a four-part series on timber trafficking in the Democratic Republic of the Congo (DRC) and how it is smuggled to Uganda and Kenya (Musinguzi 2024). *The Bridge Magazine* reported on corruption and wildlife trafficking along the DRC-Rwanda border (Umuhoza 2024). *The Citizen* documented how tax inconsistencies incentivise gold smuggling in Tanzania (Bahemu 2024) and *Musoma News Hub* explained how the country loses

38 See: https://rsf.org/en/rsf-world-press-freedom-index-2025-economic-fragility-leading-threat-press-freedom?year=2025&data_type=general

39 See: <https://www.journalismfund.eu/supported-projects>

tax revenues from the illegal exploitation and trade of tin which is facilitated by corruption (Sebastian 2025). *The Forefront Magazine* investigated illegal mining and trafficking in minerals in Rwanda (Ntawurikura 2025) while *Amazon Underworld* looked at corruption and conflicts of interest in the exploitation of gold in Peru (Huerta 2025).

While journalists and media organisations have shed essential light on the nexus between corruption and crimes that have an impact on the environment, **they are particularly at risk**. They face a wide range of threats, including arrest, imprisonment, surveillance, physical and digital aggressions and legal attacks such as administrative harassment or abusive lawsuits (International Press Institute 2024).

Between 2009 and 2023, at least 749 journalists, groups of journalists and news media outlets were targeted (UNESCO 2024). During the same period, 44 environmental journalists were killed in 15 different countries, with convictions secured in only five cases (UNESCO 2024). And more than 30 journalists covering issues such as waste, illegal mining, water pollution, deforestation, illegal sand extraction and renewable energy were obstructed, threatened or killed in 2024–2025 (RSF 2025).

When journalists are killed or threatened, media organisations join forces to continue their work. In 2023, for example, 50 journalists from 16 news organisations, coordinated by Forbidden Stories, pursued the investigations on illegal fishing started by Dom Phillips and Bruno Pereira who were murdered in 2022 in the Amazon. In February 2025, Forbidden Stories investigated the murder of Cambodian journalist Chhoeung Chheng who had been documenting illegal deforestation. In Ghana, journalists reporting on illegal gold mining face abduction, beating and death threats. In response, *The Fourth Estate*, *The Reporters' Collective* and Forbidden Stories partnered to investigate the impacts of the illegal gold industry as well as the role of money and gold laundering (Abdelilah 2025).

Despite the many challenges they face, journalists have kept investigating.

Without their dedication and courage, our understanding of how corruption and crimes that impact the environment intersect would be far more limited.

Box 10: Enhancing journalists' expertise on "follow-the-money"

Reporting on corruption or money laundering linked to crimes that have an impact on the environment requires **specialised skills and expertise**. To strengthen media coverage of these issues and thereby raise public awareness, several organisations provide targeted training.

The East Africa Wildlife Journalism Project of Internews' Earth Journalism Network and the Thomson Reuters Foundation's Curbing Illicit Financial Flows programme organise training and workshops that build and develop expertise and knowledge of journalists to investigate corruption and trace illicit financial flows related to environmental crimes.

The Centre for Investigative Journalism (CIJ) and Finance Uncovered provide in-person and online courses on financial investigations and follow the money. CIJ has also offered in 2025 a training programme called "Dark Green", designed to equip European journalists with the tools and methods needed to more effectively "follow the money" in environmental and climate related investigations.

These organisations also award grants that enable journalists to pursue their work.

4.2 Strengthening knowledge with practitioner-oriented research and learning

Civil society has played a fundamental role in **closing the knowledge gap** in relation to crimes that have an impact on the environment.

Between 2023 and 2025, the Wildlife Justice Commission, Environmental Investigation Agency, the Igarapé Institute, the FACT Coalition, the Global Initiative against Transnational Organized Crime and Earth League International, among others, have provided evidence on wildlife trafficking, illegal logging, shark fin trafficking or gold trafficking. Launched in 2023 by the Global Initiative against Transnational Organized Crime, the ECO-SOLVE project monitors and analyses data on online wildlife trafficking.

One major change compared to 2023 is the increased number of research into illegal gold mining.

While it is essential to strengthen knowledge on crimes that have an impact on the environment, **the role of corruption is often overlooked**. Limited research has focused on corruption related to crimes that have an impact on the environment.

For example, publications by the Igarapé Institute and the FACT Coalition analysed illicit financial flows (in particular money laundering) from environmental crimes, and the Basel Institute on Governance provided evidence on corruption in waste management and trade as well as on corruption in the forestry sector in Ukraine. A forthcoming report by Earth League International provides an in-depth analysis of corruption incidents linked to illegal logging, wildlife trafficking, illegal mining, land grabbing as well as illegal, unreported and unregulated fishing (Byrd et al., forthcoming). It also examines how corruption enables criminal networks to expand their activities through crime convergence.

Civil society organisations have also designed **self-paced e-learning courses** available in different languages that are free and open to everyone with the objective of sharing knowledge and increasing awareness on the relationship between corruption and crimes that have an impact on the environment.

For example, U4 Anti-Corruption Resource Centre proposes self-paced courses on corruption linked to the forestry sector and wildlife trafficking, while ACAMS offers a self-paced course on illicit financial flows associated with illegal wildlife trade. Through Basel LEARN, the Basel Institute on Governance proposes a self-paced course on Open-source Intelligence with a case study about illegal fishing.

4.3 Building bridges between anti-corruption and environmental practitioners

Since 2019, **various networks, coalitions and fora** have emerged that bring together practitioners from the anti-corruption and environmental fields.

The **UNCAC Coalition's Environmental Crime and Corruption working group**,⁴⁰ established in 2021, offers a space for civil society organisations to coordinate and develop joint advocacy efforts, provide updates on policy developments and share knowledge and findings on corruption linked to environmental matters. More than 230 individuals are members of the working group, coming from civil society organisations working at the national, regional and international levels and specialised in a wide range of topics from wildlife trafficking and climate related issues to extractive industries.

One key advocacy output is a 2024 discussion paper to facilitate discussions on interlinkages between corruption, environmental crime and climate degradation (UNCAC Coalition 2024). A forthcoming publication aims to provide an overview of knowledge gaps and best practices to address corruption linked to crimes that have an impact on the environment.

Launched in December 2022, the **Countering Environmental Corruption Practitioners Forum**⁴¹ brings together anti-corruption and conservation practitioners to discuss, exchange and foster peer-to-peer learning on issues related to corruption that impacts the environment.

Over 800 members from the anti-corruption, conservation and governance communities around the globe have joined the Forum. They include practitioners from government institutions (such as anti-corruption agencies, financial intelligence units and environmental agencies), United Nations agencies, academia, civil society organisations, journalists and the private sector.

40 See: <https://uncaccoalition.org/environmental-crime-and-corruption>

41 See: <https://environmental-corruption.org>

Plenary sessions are held twice a year, covering a wide range of cross-cutting topics such as the nexus between human rights and environmental corruption. Five working groups have also been established to address key issues: land corruption; follow-the-money and financial investigations; climate finance; open data; and minerals corruption (the latter was launched in December 2025). Members meet regularly to exchange knowledge and strengthen collaboration. Events are recorded and made publicly available on the Forum's website, which also includes blog posts by members.

The **Nature Crime Alliance**,⁴² launched in 2023 and hosted by the World Resources Institute, has set up a knowledge database compiling relevant research on nature crimes, a wildlife expert directory as well as an index of tools gathering publicly available data on technologies. Even though the Nature Crime Alliance does not focus its work on the nexus between corruption and the environment, the resources it provides are useful.

Box 11: Actions taken by the private sector

The **private sector takes part in several global initiatives**. For example, with United for Wildlife, financial institutions and the transport industries (airline and shipping companies, logistics firms, freight organisation) are committed to addressing the issue of wildlife trafficking. The private sector is also involved in initiatives such as the Global Platform for Sustainable Natural Rubber, the Forest Stewardship Council, the Extractive Industries Transparency Initiatives, the Fisheries Transparency Initiatives, the Maritime Anti-Corruption Network and the Urban Cleaning, Solid Waste and Effluents Anti-Corruption Collective Action.

In 2024, WWF and Themis, with support from the Climate Solutions Partnership (a collaboration between HSBC, World Resources Institute and WWF), launched a toolkit to equip financial institutions with knowledge on environmental crime, focusing on deforestation and land conversion, illegal mining and the illegal wildlife trade.⁴³

Private sector awareness of the role, importance and impact of corruption and money laundering associated with crimes that have an impact on the environment remains nevertheless limited. Additional efforts are needed so that the private sector does not facilitate corruption and money laundering linked to the environment.

42 See: <https://naturecrimealliance.org>

43 See: <https://www.wearethemis.com/uk/resources/environmental-crimes-financial-toolkit>

4.4 Initiating litigation for lasting change

Civil society organisations around the world have used **strategic litigation to defend human rights, tackle corruption, raise awareness on a specific issue or open new legal avenues** (Lemaître 2023a).

For example, Sherpa, the Center for Climate Crime Analysis, Repórter Brasil and Transparency International filed a **complaint in November 2023 with the French Financial Prosecutor's Office against four French banks** (BNP Paribas, Crédit Agricole, BPCE and Axa) for money laundering and concealment. The case revolves around their alleged financial support for Brazil's leading beef companies, which are suspected of contributing to illegal deforestation in the Amazon (Sherpa 2023). An investigation was opened by the Financial Prosecutor's Office.

In Italy, NGOs have made use of environmental liability provisions to secure compensation for harm caused to the environment. For example, Associazione per la Biodiversità e la sua Conservazione, supported by Conservation-Litigation.org, joined the criminal prosecution of two cactus smugglers as a civil party. In January 2025, the court convicted the smugglers and awarded EUR 20,000 in remedies to Associazione per la Biodiversità e la sua Conservazione (Conservation-Litigation.org 2025).⁴⁴ The awarded funds will be invested into cacti conservation.

In Jamaica, Freedom Imagineries uses human rights laws to address corruption and crimes that have an impact on the environment. Together with 10 individuals from communities in St. Ann, it launched a case against the government for granting a bauxite mining licence located in the Cockpit Country, a protected ecological area. Freedom Imagineries argues that the mining operations have led to health issues, dust and air pollution for the communities living near the mine. It is also alleged that the award process was not followed; mining activities started before the approval was granted. The case is ongoing.

In parallel, Freedom Imagineries submitted an application in June 2022 to the Inter-American Commission on Human Rights asking that the Jamaican government be required to adopt the necessary measures to protect the rights to health, personal integrity and life of the communities. The Commission issued precautionary measures in November 2022, requesting the country to protect the rights to life, personal integrity and health of the communities affected by the mine.⁴⁵ For defending their rights, Freedom Imagineries and affected communities have been facing threats and reprisals (Box 12).

44 The remedies were awarded based on article 185 of the Criminal code: "any crime that has caused pecuniary or non-pecuniary damage shall oblige the guilty party and the persons who, under civil law, must answer for it to pay compensation".

45 See: https://www.oas.org/en/iachr/decisions/mc/2022/res_65-22_mc_425-22_ja_en.pdf

Box 12: Anti-corruption and environmental defenders under attack

Human rights defenders working on corruption and/or the environment are targeted by state and non-state actors (Lawlor 2025, Forst 2025). Their repression is on the rise.

Since 2012, 2,253 land and environmental defenders have been killed worldwide (Global Witness 2025a).⁴⁶ In 2024 alone, 144 were murdered for defending the planet, with Latin America accounting for the vast majority of these killings (Global Witness 2025a). The most frequently reported violations include arrest and arbitrary detention, legal action, threats, surveillance and death threats (Front Line Defenders 2025). Moreover, 92 percent of defenders surveyed by Global Witness responded that they have experienced some form of online abuse or harassment as a result of their work (Global Witness 2025b).

Beyond physical, verbal and online attacks, **anti-corruption and environmental defenders also have to face the misuse of the legal and judicial system**. They are investigated and prosecuted under national security, disinformation and anti-terrorism laws, anti-money laundering legislation and defamation provisions, among others. This practice, known as **lawfare**, is found on every continent (Lemaître 2025).

⁴⁶ It is not possible to provide figures for anti-corruption defenders insofar as no organisation is accounting for their killings. Nevertheless, the 2022 report of the Special Rapporteur on the situation of human rights defenders entitled *At the heart of the struggle: human rights defenders working against corruption* provides an overview of the reprisals they face. See: <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G21/396/47/PDF/G2139647.pdf?OpenElement>. Read also Amnesty International's 2023 report *Anti-corruption fight in peril – crackdown on anti-corruption human rights defenders in West and Central Africa*.

5 A paradigm shift for corruption and the environment

Resolution 8/12 and subsequent UN Resolutions have set a precedent to address corruption as it relates to crimes that have an impact on the environment.

Nevertheless, a **paradigm shift is necessary because corruption can harm the environment without being linked to a crime that has an impact on the environment.**

For example, a bribe to obtain a land conversion permit for agricultural purposes may result in deforestation and biodiversity loss while no crime is committed. Similarly, embezzlement⁴⁷ of funds allocated for climate adaptation or mitigation projects such as afforestation or carbon capture impedes efforts to address climate change, without an environmental crime being committed.

Therefore, focusing solely on corruption linked to crimes that have an impact on the environment overlooks situations where corruption causes environmental harm without an associated criminal offence.

As our collective understanding of the connection between corruption and the environment expands, so should our definition to encompass corruption linked to activities damaging the environment. A holistic approach, moving from the concept of “corruption as it relates to crimes that have an impact on the environment” to “corruption that has an impact on the environment” is crucial for protecting the environment and people.

This section explores two interconnected issues which have a devastating impact on the environment: corruption linked to climate finance and renewable energy as well as corruption tied to the exploitation of critical minerals (see also Box 14).

5.1 Corruption linked to climate finance and renewable energy

When Resolution 8/12 was adopted in 2019, the connection between corruption and climate finance and renewable energy was not yet at the forefront of international debates and negotiations.

Over the past six years, however, research conducted by civil society organisations and academia has highlighted how **corruption hampers efforts to adapt to and mitigate climate change, jeopardises the energy transition, weakens countries’ resilience to climate disasters and leads to the misuse of climate funds** (e.g.

47 Embezzlement is a form of corruption covered by the UNCAC.

Nest et al. 2020; Transparency International 2022; Chan et al. 2023; Nest and Mullard 2025).

In its Climate and Corruption Case Atlas⁴⁸, Transparency International has identified 89 cases around the globe, and its 2024 report provides an analysis of these cases (Nest 2024). Moreover, international organisations such as UNODC and the World Bank have recognised and documented the links between corruption and climate finance (World Bank 2025; UNODC and World Bank 2024).

Research has also examined the **various forms corruption can take, such as conflicts of interest, undue influence and disproportionate lobbying, which can hinder the adoption and implementation of ambitious climate policies** (e.g. Resimić 2022; Nest and Mullard 2021). For example, Transparency International published several reports in 2024 and 2025, analysing the influence of fossil fuel interests before and during UN climate talks and how it undermines trust and legitimacy in multilateral processes as well as obstructs efforts to reduce emissions (Gverdtiteli 2025a; Goddard et al. 2024; Gverdtiteli 2025b).

Evidence provided by the Extractive Industries Transparency Initiatives (EITI), U4 Anti-Corruption Resource Centre and the Basel Institute on Governance have also underscored the various **governance and corruption risks in the renewable energy sector** (Zinnbauer and Trapnell 2023; de Vibe and Robinson 2024; Nest and Mullard 2025). This is an area requiring additional focus.

Billions of dollars are mobilised and invested for climate mitigation and adaptation.⁴⁹ Recognising and integrating corruption risks linked to climate finance and renewable energy at the international, regional and national levels is crucial to effectively address all forms of corruption jeopardising initiatives that aim to address the climate crisis.

Box 13: Collaborative educational tools for raising awareness on corruption linked to climate

Gamification is a powerful tool for raising awareness and engaging a broad audience on anti-corruption issues through interactive discussions, creative exercises and reflection.

Inspired by the success of the Climate Fresk⁵⁰ – a collaborative workshop designed to share climate knowledge with the general public – UNODC, together with its youth programme, developed a variation of this format

48 See: <https://www.transparency.org/en/projects/climate-governance-integrity-programme/climate-corruption-atlas>

49 According to the OECD, a total of USD 115.9 billion in climate finance were provided by developed countries for developing countries in 2022. See OECD. 2024. *Climate Finance Provided and Mobilised by Developed Countries in 2013–2022. Climate Finance and the USD 100 Billion Goal*. OECD.

50 See: <https://climatefresk.org/world>

to explore and deepen understanding of how corruption can exacerbate climate change and undermine climate action.

The methodology was tested in October 2025 with a group of students at the University of Mostar in Bosnia and Herzegovina as well as officials from the country's Agency for the Prevention of Corruption and Coordination of the Fight against Corruption. It received positive feedback and is currently finalised, with public release expected in 2026.

The UNODC's "corruption and climate fresk" will support the dissemination of knowledge and raise public awareness of corruption linked to climate issues.

5.2 Corruption and critical minerals

Critical or strategic minerals – such as copper, lithium, cobalt, nickel and rare earths – are essential to our daily lives. They are key components in mobile phones, computers, semiconductors, etc. These minerals also play an **important role in reducing greenhouse gas emission and enabling the energy transition.**

The International Energy Agency projects that demand for minerals used in solar panels, wind turbines, electric vehicles and related technologies will quadruple by 2040.⁵¹ Demand is further driven by the rapid development of artificial intelligence infrastructures as well as military and defence systems, making these minerals the centre of geopolitical tensions.

However, the growing demand, the race to secure mineral supplies, the urgency to address climate change and the immense profits at stake come with **significant challenges and vulnerabilities.** These range from environmental and social harms to human rights violations, corruption, financing conflicts and organised crime infiltration.

Research by Natural Resource Governance Institute (NRGI), Transparency International, EITI and UNODC underscores the **risks of corruption associated with the exploitation of critical minerals** (Sturman et al. 2022; Sayne et al. 2024; Carballo et al. 2025; UNODC 2025; Fitzgerald et al. 2025). For instance, 91 percent of rare earths, 74 percent of cobalt and 67 percent of nickel are located in countries with high perceived levels of corruption (Carballo et al. 2025).

These organisations have also documented how **corruption undermines progress towards a low carbon economy**, with corrupt practices taking place at every stage of the supply and value chains, ranging from bribery and collusion to undue influence and misappropriation of funds. NRGI identified 53 cases of corruption in 30 countries across five continents (Sayne et al. 2024).

51 See: <https://www.iea.org/energy-system/industry/critical-minerals>

To address these challenges, NRGi developed a diagnostic tool⁵² which aims at identifying the forms of corruption and creating an action plan to prevent corruption in the oil, gas and mining sectors. NRGi's diagnostic tool has already been used in Mongolia, Philippines, Guinea and Chile to diagnose corruption risks associated with the exploitation of critical minerals such as bauxite, lithium and nickel.⁵³ In the DRC, the Anti-Corruption Agency (*Agence de Prévention et de Lutte contre la Corruption* – APLC) is applying the tool to assess corruption risks associated with cobalt exploitation.

Transparency International Australia designed the Mining Awards Corruption Risk Assessment (MACRA) Tool to assess the underlying causes of corruption in mining sector awards.⁵⁴ It has been used in 23 countries. The OECD and EITI have also been developing guidance to support companies in conducting due diligence in mineral supply chains, taking an anti-corruption perspective.⁵⁵

Lastly, the UN established a panel on critical energy transition minerals, bringing together governments, intergovernmental and international organisations, industry and civil society to develop a set of common and voluntary principles to guide the transition. It published a report in 2024 laying down seven guiding principles, including principle 6 on transparency, accountability and anti-corruption measures to ensure good governance.⁵⁶

While Resolution 8/12 does not explicitly address corruption linked to critical minerals governance, States should urgently integrate anti-corruption measures and safeguards in this sector to protect efforts towards a just and equitable energy transition.

Box 14: Cross-cutting issues requiring attention: the digital challenge

Several cross-cutting issues are not addressed by Resolution 8/12, but merit close attention, as they significantly influence efforts to combat corruption that has an impact on the environment. Two examples are highlighted in this box.

Governments are increasingly relying on **digital technologies and artificial intelligence (AI) tools** to prevent, detect and investigate corruption and/or crimes that have an impact on the environment.

52 See: <https://resourcegovernance.org/publications/diagnosing-corruption-extractive-sector-tool>

53 Briefs on lessons learned for each country are available at <https://anticorruptiontool.resourcegovernance.org/>

54 See: <https://transparency.org.au/publications/macra-tool>

55 See for example: <https://www.oecd.org/content/dam/oecd/en/topics/policy-sub-issues/due-diligence-guidance-for-responsible-business-conduct/minerals/faq-how-to-address-bribery-and-corruption-risks-in-mineral-supply-chains.pdf>

56 See: https://www.un.org/sites/un2.un.org/files/report_sg_panel_on_critical_energy_transition_minerals_11_sept_2024.pdf

While digital and AI technologies offer significant opportunities and benefits, recent studies have underscored the challenges associated with these tools, including data quality issues, opaque and discriminatory algorithms, biases, regulatory gaps or risks to privacy and fundamental rights (Resimić 2025, Izdebski 2023).

Furthermore, digital and AI technologies can be “corrupted” and abused for private gain (Köbis et al. 2022a, Köbis et al. 2022b, Transparency International 2025). It can also be used to increase the surveillance of journalists and civil society organisations and further repress civic space.

Addressing and mitigating these risks is essential to ensure digital and AI technologies are an effective approach to tackle corruption that has an impact on the environment.

Cryptocurrencies are now well established in the global financial system. They are also increasingly used to facilitate illicit activities — not only cybercrime, but any type of crime involving the transfer of monetary value. Cryptocurrencies can enable corruption and money laundering (Elsayed 2023, UNODC 2025) and are intersecting with crimes that have an impact on the environment. They can add a layer of opacity and complexity that helps conceal and launder the proceeds from crimes that have an impact on the environment.

For example, in Brazil, law enforcement dismantled a criminal network which had created its own cryptocurrency to launder profits from illegal gold mining (Sayki 2022, Ministério da Justiça e Segurança Pública 2022).

Despite its prominent role, research on – and our understanding of – how cryptocurrencies are used in corruption cases linked to crimes that have an impact on the environment remains limited. Preventing and combating the misuse of cryptocurrencies, for example by equipping law enforcement authorities to navigate financial investigations related to cryptocurrencies, is therefore vital to effectively address corruption that has an impact on the environment.

6 Conclusion

Since the adoption of Resolution 8/12 in December 2019, various activities have been taking place to tackle corruption as it relates to crimes that have an impact on the environment.

In terms of **prevention**, the journey towards fostering a culture of integrity and anti-corruption is progressing, although it takes time for behaviours and practices to evolve. The report highlights a diverse range of actions that are beginning to generate concrete improvement in key systems, processes or norms within environmental authorities – not only to safeguard them from corruption, but also to encourage integrity champions and promote a broader shift in mindset. These initiatives can already be replicated and scaled up.

The international community can also play a key role by sharing these examples and encouraging States to go further in building robust systems capable of resisting corruption and enabling staff and citizens to safely report wrongdoing and misconduct.

From an **enforcement** perspective, as the first generation of money laundering cases against environmental criminals concludes, it is vital to ensure that lessons learned are shared, replicated or adapted by relevant institutions within the same jurisdiction and in other countries. The “follow-the-money” approach is beginning to show concrete results.

It is equally essential to address the root drivers of crimes that have an impact on the environment. Corruption remains an under-addressed dimension of efforts to combat these crimes. Thus, enforcement actions must receive adequate support and resources so they can prioritise the investigation and prosecution of *corruption* linked to crimes that have an impact on the environment.

This is no easy task. It requires a systemic approach with committed leadership to equip law enforcement authorities with the right resources and skills, remove obstacles and potential undue influence within the enforcement chain and build strong inter-institutional cooperation. Such collaboration is necessary for specialised anti-corruption actors to broaden their focus and investigate and prosecute crimes that have an impact on the environment.

The **contributions of non-state actors** discussed in this report include the research and reporting from journalists, civil society organisations and academia which have enhanced our understanding of corruption as it relates to crimes that have an impact on the environment. The various fora established to facilitate exchanges among officials and professionals engaged in fighting corruption and/or crimes that have an impact on the environment have provided specialised networks and knowledge to accelerate peer learning, expertise and thus impact.

Over the last six years, **most initiatives tested or implemented have primarily focused on wildlife and forest crimes**, with fewer initiatives related to other crimes that have an impact on the environment. It is worth noting, however, that this report has identified several actions targeting **illegal gold mining**, an increase compared to the 2023 report.

Even though it is still early to draw definitive conclusions on the results and impacts of these activities, they are promising in many aspects.

What make initiatives promising?

The authors looked at a combination of the following characteristics to determine the promising initiatives identified in this report:

- Tried and tested approaches in other spaces that appear to have the right preconditions to function well in the environmental space.
- New approaches that are low cost and low risk.
- Spaces where very limited work is done to date, meaning that investments might make an outsized difference.
- Engagements where environmental and integrity considerations align and thus make adoption more likely.
- Activities that align with broader national, regional or global trends, where efforts are likely to bear fruit over time.

Promising initiatives relating to corruption prevention include:

- **Conducting regular corruption perception and experience surveys among staff** can help assess both progress and the effectiveness of corruption prevention measures. It can also create baselines against which to measure progress. Not enough interventions and reform efforts start with such a baseline, which means they then struggle to assess progress.
- **Involving high-level management and leadership** at each stage of the corruption prevention approach can help develop ownership and accountability. Explaining how integrity efforts support the strategic and political priorities of the leadership is crucial to achieve this. It requires adapting technocratic approaches to be relevant to the institutional leadership.

- **Stipulating a mandatory budget for corruption prevention** across ministries, agencies and departments can help ensure that minimal investments in integrity and anti-corruption activities are effectively prioritised and implemented. Sanctions for not respecting the mandatory budget should be imposed.
- **Launching awareness-raising campaigns** to promote knowledge of anti-corruption measures is an important first step to their effective implementation.
- **Developing whistleblowing mechanisms** can help increase reporting and detection of corruption. To achieve their potential, whistleblower mechanisms require a strong system, reliable protections and an institutional culture that welcomes such feedback.
- **Peer-to-peer learning for government representatives from different countries and institutions to exchange** on corruption prevention actions can be relevant, as anti-corruption officials often struggle with similar institutional challenges. Peer exchanges can help people and institutions to learn from each other's successes and challenges and jointly identify effective mitigation measures.

Promising initiatives relating to enforcement include:

- **Assessing the economic, social and environmental losses** from cases of corruption linked to crimes that have an impact on the environment – and using these to calculate associated penalties and fines – can help compensate and restore some of the harm done. Combining calculations of losses due to corruption with those of losses due to the environmental crimes can result in stiffer sentences and penalties.
- **Seizing and confiscating proceeds and instrumentalities of crime** (bank accounts, real estate, vehicles, machineries, etc.) through the diverse legal instruments available in jurisdictions can help ensure that crime does not pay. It also removes the resources needed to continue activities that harm the environment, thereby halting ongoing destruction.
- **Exploring legal avenues outside the anti-corruption field** can help strengthen enforcement. These include legislation on money laundering and tax offences as well as social re-use of seized and confiscation assets, sanctions and visa bans.

Further promising initiatives

UNCAC States Parties, civil society, academia, the media and the private sector have also engaged in initiatives in areas that were not laid out in Resolution 8/12 which show promising signals and should be highlighted:

- **The increase of transparency and accountability** through initiatives such as the Extractive Industries Transparency Initiative⁵⁷, the Fisheries Transparency Initiative⁵⁸, the Open Government Partnership⁵⁹ and the Open Contracting Partnership⁶⁰.
- **The adoption of beneficial ownership legislation**, the disclosure of beneficial ownership information, including politically exposed persons, and the creation of beneficial ownership registers.⁶¹
- **The establishment of traceability systems, electronic information systems and electronic permitting systems** in the forestry, wildlife and fisheries sector.⁶²
- **The monitoring and reviewing of court proceedings and decisions.**⁶³

Looking ahead

Overall, the diversity of engagements is laudable. But it is far from the scale needed to make a systemic difference to both societal corruption and environmental challenges. Sustaining efforts and maintaining momentum over time are necessary for long-lasting change. UNCAC States Parties need to adapt and scale up initiatives that are effective or look promising, by:

- **Ensuring more robust staffing and prioritisation of corruption prevention systems** in government and state-owned enterprises tasked with conserving, managing or trading natural resources.
- **Developing specialised knowledge and expertise** of governmental institutions and agencies to better address corruption that impacts the environment.

57 See: <https://eiti.org/>

58 See: <https://fiti.global/>

59 See: <https://www.opengovpartnership.org/>

60 See: <https://www.open-contracting.org/>

61 For an overview of actions worldwide on beneficial ownership transparency, see the work by Open Ownership: <https://www.openownership.org/en/map/>

62 For example, in 2021–2022, WWF Peru piloted an electronic permitting app to reduce opportunities for corruption in the fisheries sector. See: <https://www.worldwildlife.org/pages/tnrc-peru-pilot-summary>. In addition, around 30 countries are developing or planning electronic CITES permit systems.

63 For more information, see the TNRC publication reviewing the monitoring of wildlife crime cases in Africa, Asia and South America: <https://www.worldwildlife.org/pages/tnrc-practice-note-monitoring-wildlife-crime-cases-a-possible-approach-to-reduce-corruption-in-the-justice-system>

- **Incorporating anti-corruption measures into environmental and natural resource policies** and strengthening environmental governance structures to include anti-corruption internal controls and mechanisms.
- **Dedicating greater resources for specialised law enforcement** to pursue complex financial flows linked to corruption and crimes that have an impact on the environment.
- **Increasing inter-agency collaboration** and conducting joint operations on corruption that has an impact on the environment.
- **Making use of legal frameworks and testing new legal avenues** to hold individuals and legal persons accountable, including through asset recovery and remedies to repair the damage.
- **Engaging in platforms** for representatives from governments, civil society and other stakeholder groups to exchange experiences and know-how in tackling corruption that has an impact on the environment.
- **Sharing knowledge**, case law, success stories, etc.
- **Ensuring that this issue is integrated in all relevant United Nations processes** such as the ones related to climate and biodiversity.
- **Protecting and defending civil society space, press freedom and human rights defenders** working on the environment and corruption-related issues.

As these initiatives have now been conducted for six years, there is a sufficient body to scrutinise their effectiveness and efficiency. It is therefore **essential to rigorously assess these measures**, especially in an environment of increasingly scarce financial resources.

Finally, a paradigm shift is now more than ever necessary. **We need to move from the concept of “corruption as it relates to crimes that have an impact on the environment” to “corruption that has an impact on the environment”.**

Adopting a holistic approach is crucial to address all forms of corruption that affect the environment, including pressing issues such as corruption linked to climate finance, renewable energy and the exploitation of critical minerals.

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Annex 1 – Relevant resources

Resource hubs, learning platforms and tools

ACAMS self-paced course: <https://www.acams.org/en/training/certificates/ending-illegal-wildlife-trade#learning-points-4fd76b28>

Basel Institute on Governance's publications and resources on Green Corruption: <https://baselgovernance.org/publications?topic=6&type=All&country=All&language=All&title>

Basel LEARN: <https://learn.baselgovernance.org>

ECOSOLVE's Global Monitoring System on illicit online wildlife markets: <https://www.ecosolve.eco/dashboard>

Environmental Investigation Agency's Global Environmental Crime Tracker: <https://eia-international.org/global-environmental-crime-tracker>

International Maritime Organization's self-paced course: <https://www.imo.org/en/mediacentre/pressbriefings/pages/new-e-learning-course-tackles-illegal-wildlife-trade.aspx>

Nature Crime Alliance's knowledge database: <https://naturecrimealliance.org/knowledge-database>

Nature Crime Alliance's index of tools (a compilation of tools developed by various organisations): <https://naturecrimealliance.org/index-of-tools>

Natural Resource Governance Institute's tool to diagnose corruption in the extractive sector: <https://resourcegovernance.org/publications/diagnosing-corruption-extractive-sector-tool>

Targeting Natural Resource Corruption knowledge hub: <https://www.worldwildlife.org/pages/tnrc-knowledge-hub>

Transparency International's Climate and corruption atlas: <https://www.transparency.org/en/projects/climate-governance-integrity-programme/climate-corruption-atlas>

Transparency International Australia's Mining Awards Corruption Risk Assessment Tool (MACRA Tool): <https://mining.transparency.org.au/macra-tool>

U4 Anti-Corruption Resource Centre self-paced courses: <https://www.u4.no/U4-natural-resources-short-online-courses>

UNODC's publications and resources: <https://www.unodc.org/unodc/en/environment-climate/resources.html>

UNODC's global analysis on crimes that affect the environment: <https://www.unodc.org/unodc/en/data-and-analysis/crimes-that-affect-the-environment.html>

UNODC's teaching modules on wildlife crime: <https://sherloc.unodc.org/cld/en/education/tertiary/wildlife-crime.html>

WWF and Themis's Environmental Crimes Financial Toolkit: <https://www.wearethemis.com/uk/resources/environmental-crimes-financial-toolkit>

Main publications since 2019 providing a global overview of corruption, money laundering and financial crimes linked to crimes that have an impact on the environment

Amerhauser, Kristina and Robin Cartwright. 2023. *Hidden in plain sight – counting the cost of environmental crime*. Global Initiative against Transnational Organized Crime.

Barber, Victor Charles, et al. 2025. *People. Planet. Justice. Understanding and countering nature crime*. World Resources Institute.

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Stassart, Joachim, and Flávia M. de A. Collaço. 2023. *Addressing land corruption for climate justice*. Transparency International.

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Annex 2 – Initiatives from the 2023 Seedlings of hope report

Below are two promising initiatives which were included in the *Seedlings of hope* report published in 2023.



Indonesia: Combining anti-corruption and anti-money laundering legislation for nature restoration

PT Duta Palma, a major palm oil conglomerate in Indonesia, and its

subsidiaries have been under investigation for bribing public officials in Riau Province, illegal land clearing and conversion and land conflicts with local communities, among many allegations. In September 2023, Surya Darmadi, the CEO of PT Duta Palma, saw his initial conviction in February 2023 for corruption and money laundering upheld by the Supreme Court of Indonesia (Jong Hans Nicholas 2023).

The case has many distinctive features. The conviction is exemplary: Surya Darmadi was sentenced to 16 years in prison. The Attorney General's Office took an innovative approach. Instead of relying on environmental crime legislation, it based its case on the Indonesian anti-corruption law that includes a special provision on unlawful enrichment that has an impact on finance and economic state loss. The Supreme Court followed the Attorney General's approach, using the provisions related to economic loss for the State and the removal of the illegal gains for its verdict.

While the imposed fine of IDR 2.23 trillion (equivalent to USD 144 million) represents a significant reduction from the initial conviction in February 2023,⁶⁴ the case underscores the possibility of assessing economic and social losses resulting from corrupt practices linked to crimes that have an impact on the environment.

With several corruption cases currently under prosecution that have similar characteristics, one can only hope that the ensuing fines will reflect the gravity of the offences, ensuring that effective restoration actions are taken and sending a clear message that crime does not pay.

⁶⁴ Surya Darmadi was originally convicted in February 2023 to repay IDR 2.2 trillion (equivalent to USD 144 million) that he owned to the government and a further IDR 39 trillion (equivalent to USD 2.5 billion) to the State to compensate for the loss. If he was unable to pay, his assets would have been confiscated and if it was not sufficient, it would have been replaced with an additional five years of prison time (Llewellyn Aisyah 2023). The motives for the turn of judgment in September 2023 were not available at the time of writing the report.



Thailand: Using anti-money laundering legislation to confiscate illicit acquired assets

In Thailand, after a first criminal investigation into the operations of Boonchai Bach, a Vietnamese and Thai citizen suspected of wildlife trafficking, the Anti-Money Laundering Office opened a new case in 2019. It collaborated with the NGO Freeland Foundation to map the entire criminal network. Using the Anti-Money Laundering Act, the Anti-Money Laundering Office seized and froze more than THB 300 million (USD 11 million) worth of assets (including hotels, land, vehicles and bank accounts) of Boonchai Bach for laundering profits of wildlife trafficking (Freeland 2021).

The case was a success thanks in part to the collaboration with the Freeland Foundation and government agencies from Australia, Malaysia, South Africa, Thailand and the US (Cabrejo le Roux and Romero 2023). Thailand, Vietnam and Malaysia are examining how they can work together to make it a multi-country case to seize his assets in every jurisdiction (Nuwer 2023).

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