

10 December 2023

English only

---

**Tenth session**  
Atlanta, United States of America,  
11–15 December 2023

**Statement submitted by UNCAC Coalition, a  
non-governmental organization not in consultative status  
with the Economic and Social Council\***

The following document is being circulated in accordance with paragraph 1 (i) of resolution 4/6 of the Conference of the States Parties to the United Nations Convention against Corruption and rule 17, paragraph 3 (b), of the rules of procedure for the Conference.

---

---

\* The present document is processed in the form in which it was received.



## Impact Through Follow-Up Activities to Civil Society Parallel Reports on UNCAC Implementation

UNCAC Coalition Submission to the  
10th Session of the UNCAC Conference of the States Parties

**24 November 2023**

The UNCAC Coalition has launched an initiative for civil society organizations (CSOs) to promote and act on the recommendations developed in their parallel reports on UNCAC implementation in their country.<sup>1</sup> These ‘follow-up activities’ seek to enable our members and affiliates to interact with the government, relevant key stakeholders and policy-makers, to create momentum and advocate for reforms on the national level. At a global level, these efforts aim to strengthen the implementation of the UN Convention against Corruption (UNCAC).<sup>2</sup> This submission to the 10th session of the UNCAC Conference of the States Parties (CoSP10) gives an overview of the activities conducted and shares successful impact stories from three States Parties between 2021-2022, as well as a first look at preliminary outcomes of ongoing follow-up activities.

### **Liberia<sup>3</sup>**

In Liberia, the Center for Security Studies and Development (CENSSAD)<sup>4</sup> promoted action to strengthen governance, transparency and accountability measures by:

- **Promoting the passage of four key anti-corruption bills**, granting the Liberia Anti-Corruption Commission (LACC) authority to: investigate and prosecute corruption cases, combating money laundering and terrorist financing and establishing laws for protection of whistle-blowers and witnesses;
- **Advocating for strong leadership within the government’s anti-corruption bodies**: promoting the recruitment of effective, independent Commissioners to the LACC;
- **Increasing transparency and inclusiveness around the UNCAC country review process**: advocating for the Liberian government to sign up to the UNCAC Coalition’s

---

<sup>1</sup> More information about civil society parallel reports is available on the UNCAC Coalition website: <https://uncaccoalition.org/uncac-review/cso-review-reports/>.

<sup>2</sup> To learn more about the full scope of the follow-up activities and the impacts achieved, please visit: <https://uncaccoalition.org/uncac-review/cso-review-reports/follow-up-activities/>.

<sup>3</sup> Read the full impact story on Liberia at: <https://uncaccoalition.org/follow-up-activities-liberia/>.

<sup>4</sup> See their parallel report, published in March 2022, here: <https://uncaccoalition.org/parallel-report-liberia/>.

Transparency Pledge,<sup>5</sup> a voluntary commitment to meet minimum standards of transparency and civil society participation in the UNCAC review mechanism.

To build support for these issues, CENSSAD carried out advocacy, coalition-building and strategic communications activities such as high-level meetings with the Financial Intelligence Unit and General Auditing Commission; convening a one day Anti-Corruption Forum at the LACC,<sup>6</sup> and organizing meetings with the media. This helped bring about the following changes:

- The four anti-corruption bills were passed into law by the national legislature in July 2022;
- A vacancy for a Commissioner at the LACC was filled in May 2022, and recruitment for another vacancy was opened shortly after;
- The Liberian government signed the UNCAC Coalition's Transparency Pledge in August 2023.<sup>7</sup>

The efforts helped increase awareness among journalists, CSOs and other stakeholders about the importance of anti-corruption, while actively engaging members of the legislature and officials in various government agencies to strengthen anti-corruption measures in Liberia.

Through continuous advocacy, CENSSAD hopes to advance strong anti-corruption reforms and the active participation of civil society in Liberia's UNCAC country review process. As an outcome of recent meetings with LACC representatives, CENSSAD will support the government in adhering to its Transparency Pledge commitments.

## Togo<sup>8</sup>

In Togo, *l'Alliance Nationale des Consommateurs et de l'Environnement* (ANCE)<sup>9</sup> set out to:

- **Advocate for the adoption of a framework law on anti-corruption in Togo**, raising public awareness about its urgency as part of a serious anti-corruption campaign by the state;
- **Promote civil society participation in the adoption of the national anti-corruption strategy** (SNPLCIA), allowing for stronger advocacy on key recommendations.

---

<sup>5</sup> Read more about the UNCAC Coalition's Transparency Pledge: <https://uncaccoalition.org/uncac-review/transparency-pledge/>.

<sup>6</sup> See: <https://lr.usembassy.gov/charge-daffaires-joel-mayburys-remarks-at-the-center-for-security-studies-and-development/>.

<sup>7</sup> See: <https://uncaccoalition.org/liberia-signs-the-uncac-review-transparency-pledge/>.

<sup>8</sup> Read the full impact story on Togo at: <https://uncaccoalition.org/follow-up-activities-togo/>.

<sup>9</sup> See their parallel report, published in March 2022, here: <https://uncaccoalition.org/new-civil-society-report-on-togo-legislative-advances-are-promising-for-anti-corruption-efforts-but-are-not-matched-by-adequate-enforcement/>.

To build support for these issues, ANCE disseminated a summary of its parallel report findings to relevant stakeholders, among them, government officials, civil society representatives and the media;<sup>10</sup> participated in two televised programs to raise awareness about anti-corruption in Togo and coordinated and shared information among civil society. Advocacy meetings were organized with public bodies including the High Authority for the Prevention and Fight against Corruption (HAPLUCIA) and the General State Inspectorate (IGE).

ANCE achieved success in generating greater support for the adoption of the draft bill on the prevention of corruption by promoting better knowledge of the key recommendations for strengthening the fight against corruption in Togo. The vast majority of these recommendations were integrated into the national strategy (SNPLCIA), including the need to adopt a law on whistle-blowers protection, the creation of a state judicial agency, and a specialized investigative body for the fight against corruption. ANCE's initiatives to ensure civil society participation in technical workshops and meetings ahead of the SNPLCIA's final reading were crucial to the production of a balanced national strategy, which was ultimately adopted in October 2022.<sup>11</sup>

Through continuous advocacy, ANCE hopes to advance strong anti-corruption reforms and the active participation of civil society in Togo's UNCAC country review process. Two seats have been set aside for civil society in the National Steering Committee, and ANCE will be well-placed to advocate for the implementation of the SNPLCIA.

## Madagascar<sup>12</sup>

In Madagascar, Transparency International - Initiative Madagascar (TI-MG)<sup>13</sup> set out to:

- **Remind the government and public officials that they have pending recommendations** that require implementation in order to comply with international anti-corruption standards;
- **Advocate for the passing of legislation on access to information and the protection of human rights defenders and whistle-blowers**, which has been stalled by the government and members of parliament for years.

---

<sup>10</sup> See summary (available in French only), here: [https://uncaccoalition.org/wp-content/uploads/PROSPECTUS-ANCE\\_UNCAC-Summary-document-13-October-2022.pdf](https://uncaccoalition.org/wp-content/uploads/PROSPECTUS-ANCE_UNCAC-Summary-document-13-October-2022.pdf).

<sup>11</sup> See: <https://www.togofirst.com/fr/gouvernance-economique/1410-10777-lutte-contre-la-corruption-le-togo-se-dote-d-un-plan-strategique-national>.

<sup>12</sup> Read the full impact story on Madagascar at: <https://uncaccoalition.org/follow-up-activities-madagascar/>.

<sup>13</sup> See their parallel report, published in August 2021, here: <https://uncaccoalition.org/new-civil-society-report-on-madagascar-momentum-built-on-anti-corruption-initiatives-requires-concrete-legal-action-and-increased-political-will-to-advance-efforts/>.

To build support for the adoption of the two bills, TI-MG produced a short follow-up document to their parallel report,<sup>14</sup> organized a public debate broadcast across national media, filmed an advocacy video showcasing why the two bills are crucial for anti-corruption; and launched a national petition (online and offline), among other activities.

Through these outreach and advocacy activities, TI-MG successfully advanced anti-corruption efforts in Madagascar. Revisiting the recommendations made in their own parallel report one year on, TI-MG's follow-up document provided a largely negative overview of the status of anti-corruption efforts in Madagascar. In an attempt to understand this situation, interviews with members of the government's Anti-Corruption Unit and the Committee for the Safeguarding of Integrity, among others, were held, and more comments and recommendations for the streamlining of existing structures were collected. As a result of a conference-debate convened by TI-MG on the adoption of the two anti-corruption bills,<sup>15</sup> government representatives present acknowledged the urgency of these issues, promising to speak to their peers about taking action. It is planned to present the results of the petition to the National Assembly, Ministry of Justice and the Prime Minister.<sup>16</sup>

Due to the great reluctance on the part of leaders to adopt laws that promote the fight against corruption, long-term advocacy in favour of these initiatives is needed. TI-MG plans to continue to fuel the debate through its social networks and communication channels.

## Paraguay

In Paraguay, *Semillas para la Democracia* (Semillas)<sup>17</sup> set out to:

- **Monitor developments** relating to the legal framework for **political financing and make suggestions for improvement** in meetings with relevant stakeholder;
- **Improve inter-institutional coordination** between the Superior Tribunal of Electoral Justice (TSJE), the Secretariat for the Prevention of Money or Asset Laundering (SEPRELAD), the National Anti-Corruption Secretariat (SENAC) and the Public Prosecutor's Office.

---

<sup>14</sup> See document (available in French only): <https://uncaccoalition.org/wp-content/uploads/Suivi-des-recommandations-UNCAC-25-October-2022.pdf>.

<sup>15</sup> See: <https://twitter.com/KeRafitoson/status/1570608882770386945>.

<sup>16</sup> See the petition online (in Malagasy and French): [https://www.change.org/p/arovy-ny-mpiario-zo-pour-une-loi-prot%C3%A9geant-les-ddh-lanceurs-d-alerte-%C3%A0-madagascar?recruiter=57125490&recruited\\_by\\_id=c6a97a20-d405-0130-c778-3c764e044e9e&utm\\_source=share\\_petition&utm\\_campaign=share\\_petition&utm\\_term=c518c24039954086a018306540ec8faa&utm\\_medium=copylink&utm\\_content=cl\\_sharecopy\\_33346986\\_fr-FR%3A7](https://www.change.org/p/arovy-ny-mpiario-zo-pour-une-loi-prot%C3%A9geant-les-ddh-lanceurs-d-alerte-%C3%A0-madagascar?recruiter=57125490&recruited_by_id=c6a97a20-d405-0130-c778-3c764e044e9e&utm_source=share_petition&utm_campaign=share_petition&utm_term=c518c24039954086a018306540ec8faa&utm_medium=copylink&utm_content=cl_sharecopy_33346986_fr-FR%3A7).

<sup>17</sup> See their parallel report, published in November 2021, here: <https://uncaccoalition.org/new-civil-society-report-on-paraguay-more-independent-institutions-and-stricter-enforcement-of-anti-money-laundering-mechanisms-needed-to-advance-anti-corruption-efforts/>; A more detailed account of their follow-up activities will soon be available here: <https://uncaccoalition.org/uncac-review/cso-review-reports/follow-up-activities/>.

Semillas held numerous meetings with relevant stakeholders, including public institutions, parliamentary representatives of political parties and other CSOs, and was instrumental in advocating for an inter-institutional roundtable on political financing to take place. A roundtable they organized with CSOs and public institutions resulted in CSOs pledging to work together to increase political finance transparency in the long-term, so Semillas' efforts will continue with even more backing.

## Brazil

In Brazil, *Transparência Internacional Brazil*<sup>18</sup> set out to:

- **Continuously monitoring and developing a better understanding of the anti-money laundering (AML) proposals** currently under discussion in the National Congress;
- **Map legislative proposals and compile suggestions for amendments to bills of law**, to ensure that TI Brazil's priorities are given due consideration within the legislative process;
- **Engage with parliamentarians, presenting proposals and advocating for their inclusion** in the bills of law which are already under discussion in Congress.

This project is running simultaneously with Brazil's Financial Action Task Force (FATF) evaluation, presenting TI Brazil with a window of opportunity to take part in prominent discussion about AML and advocate for priority issues, such as the need for protections against external influence, deeper integration of the AML system with anti-corruption bodies, and specific regulations for environmental goods. The CSO's efforts are currently ongoing and will continue to feed into public debates on money laundering through targeted advocacy and media efforts, in order to exert pressure on decision-makers and raise awareness among the general public.

## Mexico

In Mexico, *Derechos Humanos y Litigio Estratégico (DLM)*<sup>19</sup> set out to:

- **Advocate for the discussion and approval of a Federal Law for the Protection of Whistle-blowers and Victims of Corruption;**
- **Promote transparency and publicity of the key documents of Mexico's second cycle UNCAC review**, including the self-assessment checklist and full country report, **and**

---

<sup>18</sup> See their parallel report, published in September 2022, here:

<https://uncaccoalition.org/uncaccivilsocietyreportbrazil/>; A more detailed account of their follow-up activities will soon be available here: <https://uncaccoalition.org/uncac-review/cso-review-reports/follow-up-activities/>.

<sup>19</sup> See their parallel report, published in September 2022, here:

<https://uncaccoalition.org/uncacparallelreportmexico/>; A more detailed account of their follow-up activities will soon be available here: <https://uncaccoalition.org/uncac-review/cso-review-reports/follow-up-activities/>.

**ensure effective follow-up** on their review, and on DLM's parallel report's recommendations.

DLM sent numerous letters to decision-makers and held meetings with relevant public institutions and civil society stakeholders alike to advocate for reforming the legal framework for whistle-blower reporting and protection mechanisms. Through freedom of information requests and meetings with Mexico's UNCAC review focal point's office, DLM was able to present their parallel report's recommendations and advocate for more transparency in and participation of civil society in Mexico's UNCAC review and its follow-up.