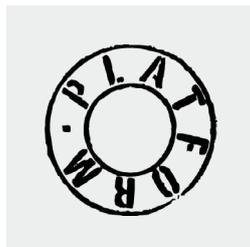
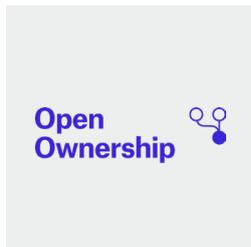


CLEAN AND GREEN

A manifesto on how
the UK's anti-corruption
efforts can help tackle
environmental harm



The following organisations have endorsed the manifesto's recommendations:



EXECUTIVE SUMMARY

As the world faces a triple planetary crisis of climate change, biodiversity loss and pollution, and the UK government warns that *“every critical ecosystem is on a pathway to collapse”*, the need to accelerate action against environmental harm is clearly more urgent than ever.¹

This manifesto – developed in consultation with civil society organisations working to counter corruption and environmental harms and promote social justice – identifies five areas of consensus where anti-corruption efforts could help tackle environmental harm to promote an economy that is both clean and green.

If implemented, these measures are designed to ensure corrupt actors who engage in environmental harm are exposed and held to account, public spending to address climate change is transparent and fair, and public policy to address environmental harms is not undermined.

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Recommendations

The UK government should ensure that existing laws and regulations are used more effectively to crack down on corruption and money laundering that enable environmental harms, and introduce cross cutting legislation like a Business, Human Rights and Environment Act.

The UK Parliament and Holyrood should introduce robust standalone laws to establish universal protections against the abusive lawsuits known as 'Strategic Lawsuits Against Public Participation' (SLAPPs).

The UK government should introduce comprehensive protections and safeguards for whistleblowers, followed by financial incentives, to enable whistleblowers to disclose evidence of corruption and money laundering that facilitate environmental harm.

The UK government should support national platforms for tracking climate finance alongside higher reporting standards and transparency. These efforts should be underpinned by a tighter and credible international definition of what does and does not count as climate finance, and boosted by 'polluter pays' taxes.

The UK should also play a leadership role in ensuring countries apply the UN Conventions Against Corruption and Transnational Organised Crime to ensure the proper use and management of climate finance funds.²

The UK government should continue pressing UK Overseas Territories and Crown Dependencies to provide meaningful access to beneficial ownership data in line with previous commitments and with no further delay, which at the very least should align with the EU standards. At a minimum, journalists, civil society organisations, academics, obliged entities and law enforcement agencies should have open and searchable access to the data.

The lobbying regime must be urgently updated to address vulnerabilities and loopholes and prevent the energy transition being delayed or derailed by vested interests involved in environmental harm. Internationally, the UK government should press the United Nations Framework Convention on Climate Change Secretariat to set high transparency and access standards for big polluters.

KEY TERMS

Environmental harm is any activity which causes damage to the natural environment such as biodiversity loss and pollution. It often stems from failures of social and development policies and damages efforts to secure social justice.

Corruption is an enabling factor for environmental harm.³

It enables **environmental crimes** such as wildlife trafficking, illegal mining, pollution, and crimes in the forestry, fisheries and waste sectors, as well as environmental harms that are not linked to an environmental crime such as pollution and biodiversity loss caused by mining activities, deforestation, and the burning of fossil fuels.⁴

Corruption enabled environmental harm also causes or worsens the effects of **climate change**. For example, corruption can affect the disbursement of climate finance, or the mining of critical minerals that are essential for the energy transition away from fossil fuels to renewable energy sources like solar power.⁵

In this way, corruption damages efforts to secure a **'just transition'** – a multifaceted concept that the International Labour Organization defines as *"greening the economy in a way that is as fair and inclusive as possible, creating decent work opportunities and leaving no one behind"*.⁶

Efforts to address climate change are not uniquely vulnerable to corruption risks; corruption is rooted in long-standing, systemic factors present in all parts of the global political economy.

But efforts to address climate change are exposed to these existing factors at a time when they need to be rapidly scaled-up, making anti-corruption an essential part of tackling climate change.

KEY STATS

\$281BN

one estimate for the amount of illicit gains generated each year from environmental crimes.⁷

\$100BN

the amount of illicit finance the National Crime Agency (NCA) assesses could realistically be laundered every year through the UK.⁸

\$8.5MN

total assets recovered since 2019 by agencies in England, Wales and Northern Ireland responsible for environmental protection, 0.5% of total £1.6 billion recovered in the same time frame across the UK (except Scotland).⁹

\$300BN

the amount of climate finance per year that countries at 2024's COP29 agreed to mobilise for developing countries by 2035.¹⁰

\$1.3TN

amount of climate finance countries at COP29 agreed to provide to developing countries each year from all public and private sources by 2035.¹¹

1 Strengthening enforcement

This section looks at how the UK's enforcement against the corruption and illicit finance that enable environmental harms could be strengthened through new and existing enforcement tools.

A. Money laundering investigations

Targeting the criminal gains of environmental harms is essential for deterrence.¹² Money laundering investigations are key to tracing the illicit financial flows – the movement of money across borders that is illegal in its source, its transfer, or its use – which enable criminal networks and their professional enablers to launder the profits from these activities.¹³



Left A landmark Court of Appeal decision in 2024 (*World Uyghur Congress vs National Crime Agency*) underlined how businesses could be exposed to criminal liability under the Proceeds of Crime Act if they trade in goods that they either know or suspect derive from human rights abuses or other criminality, including in relation to environmental crime.¹⁴ Following this, the Global Legal Action Network and the London Mining Network in 2025 alerted the London Metal Exchange, and their regulator the Financial Conduct Authority (FCA), to the risk that copper originating from the Grasberg mine in Indonesia may constitute the “*proceeds of crime*” since it is allegedly produced in circumstances that would breach UK criminal law were they to occur in the UK.¹⁵

Photo: © Room the Agency / Alamy

B. Asset recovery

Following a financial investigation, law enforcement can recover illicit finance using powers under the Proceeds of Crime Act 2002.¹⁶ Increasing asset recovery in relation to environmental crime is excellent value for money. Recovered funds should be used to compensate victims, invested in projects that tackle climate change or clean up environmental damage, while a proportion should be reinvested into agencies to drive further enforcement.¹⁷

The convergence between illicit finance and environmental crime is illustrated by the global illegal gold trade, which the UK government has conservatively estimated is worth at least \$80 billion (£60 billion) annually.¹⁸ Illegal gold mining and trafficking fuel widespread environmental harm and human rights abuses, while its proceeds are routinely laundered with the help of professional enablers. As home to the largest over-the-counter gold bullion market, as well as the headquarters of the London Bullion Market Association (LBMA) and the World Gold Council, the UK is well placed to provide global leadership on tracking and recovering illicit gold flows.

C. Anti-Bribery

Bribery is a key form of corruption that enables a wide range of environmental harms. It is well recognised for instance that bribery to secure licences to mine critical minerals undermines a just energy transition by denying communities their fair share of the benefits and enabling companies to neglect and harm vulnerable populations and ecosystems with impunity.¹⁹ Alongside increased bribery enforcement under the UK Bribery Act 2010, there should be greater compensation for the victims of corruption overseas, who are all too often left to suffer the devastating consequences of corruption and the environmental harms it enables such as large-scale pollution.²⁰



Left Operation 'Grey Arcadia' in South Wales saw five individuals convicted of bribery in 2023 – and their criminal profits confiscated – following an investigation into bribery of council officials who enabled a waste disposal company to misrepresent the type and amount of waste being deposited at a waste management facility in order to save on tipping fees.²¹

Photo: © Kathy deWitt / Alamy

D. Failure to prevent fraud and greenwashing

Greenwashing is a form of corruption because it involves large companies abusing their power to benefit from increased profits and market share.²² The offence of failure to prevent fraud introduced by the Economic Crime and Corporate Transparency Act 2023 allows prosecutors to hold large organisations to account if they profit from fraud. While the offence only came into effect in September 2025 and remains untested, the official guidance for the offence specifically identifies "fabricated" environmental credentials – widely known as greenwashing – as grounds for prosecution.²³



Left Legitimate scepticism around voluntary carbon markets (VCMs) – where companies fund emissions reduction elsewhere to compensate for their own emissions – has been reinforced by such schemes' apparent vulnerability to corruption and fraud.²⁴ While the Royal United Services Institute notes that there is insufficient evidence to say whether VCMs are at greater risk of corruption compared to other markets, anti-corruption and financial crime tools – including the new failure to prevent fraud offence – are well placed to tackle corruption in VCMs if it arises.²⁵

Photo: © Clynt Garnham Energy / Alamy

E. Debarment

The UK government has significant powers to 'debar' companies from bidding for public contracts, including if they have been convicted for corruption or environmental misconduct.²⁶ However, a new power introduced by the Procurement Act 2023 to add companies to a debarment list remains completely unused and the government lacks powers to exclude companies when there is overwhelming evidence of corruption or environmental misconduct but no conviction.²⁷

F. Sanctions

The UK has sanctions regimes for addressing some forms of human rights abuses and corruption, but these can only be used to address environmental harm in limited situations.²⁸ While existing sanctions regimes could and should be used much more against environmental harm, a broader 'environmental harms' sanctions regime could be used more flexibly against a greater range of conduct, from the criminal networks involved in the illegal trade of wildlife, fish and timber, to companies which defraud carbon offsetting schemes.²⁹

G. Enforcing against crimes committed overseas

UK legislation – including that relating to environmental crime – generally only applies to conduct that takes place in the UK.³⁰ In addition, the main agencies responsible for enforcing against environmental crime have no track record in enforcing UK-connected crimes overseas due to a lack of mandate and resources.³¹ However, UK laws and regulations used for countering corruption and illicit finance including the Proceeds of Crime Act's asset recovery powers, the Bribery Act, and sanctions can apply extraterritorially, making them uniquely powerful for enforcing against corruption or illicit finance which enables environmental crimes that take place overseas but have a connection to the UK.

H. Mandatory human rights and environmental due diligence

It is crucial for companies to conduct due diligence to identify, prevent and mitigate potential and actual human rights and environmental impacts in their value chain, which in many cases are more likely to occur when corruption risks are high.³² The UK government has affirmed that companies "*should conduct risk-based human rights and environmental due diligence*" in line with various global guidelines.³³ But crucially, there is no legal requirement for companies in the UK to conduct due diligence on a comprehensive range of environmental harms in their supply chains, in contrast to new requirements in the EU.³⁴

Recommendation

The UK government should ensure that existing laws and regulations are used more effectively to crack down on corruption and money laundering that enable environmental harms, and introduce cross cutting legislation like a Business, Human Rights and Environment Act.³⁵

2 Bringing the truth to light

All too often, the corruption that enables environmental harms continues unchecked because it never comes to light.

The UK is the number one originator of abusive lawsuits known as ‘Strategic Lawsuits Against Public Participation’ or ‘SLAPPs’.³⁶ Whistleblowers who may want to bring evidence of wrongdoing to light often lack safeguards to protect them from dismissal, workplace victimisation and other forms of abuse. As a result, bad actors are more likely to evade accountability and continue their destructive and harmful activities.

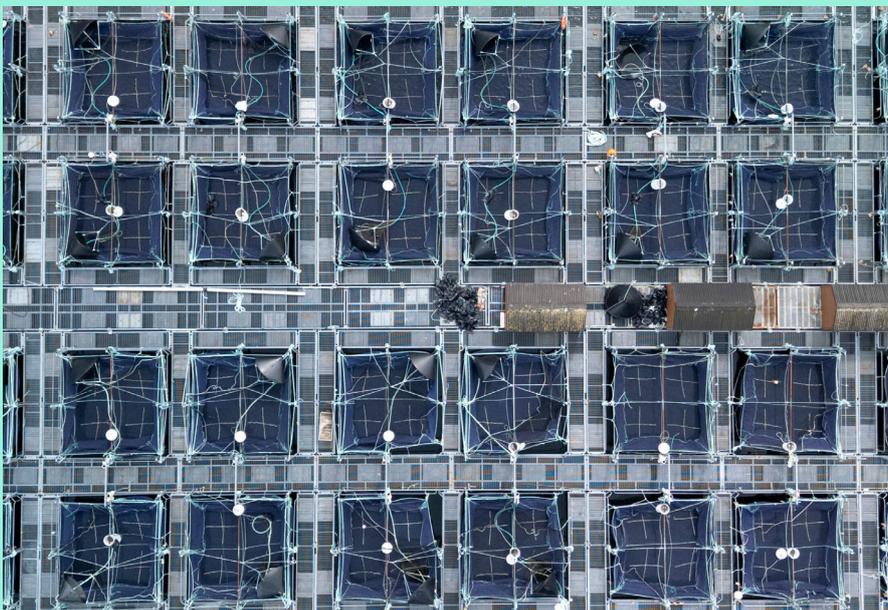
These journalists, whistleblowers, activists, members of trade unions, and others can all be considered ‘environmental defenders’, who around the world are facing increasing threats to their lives, livelihoods and freedoms as highlighted by Global Witness.³⁷

The UK is no exception; in 2024 the UN Special Rapporteur on Environmental Defenders under the Aarhus Convention issued a statement detailing serious concern at the “*increasingly severe crackdowns on environmental defenders*”.³⁸

A. Stopping SLAPPs

Exposure in the public interest of activities that cause environmental harm – which may in turn be enabled by corruption – are one of many areas targeted by SLAPPs, defined by the UK Anti-SLAPP coalition as “*abusive lawsuits filed by a private party with the purpose of silencing critical speech*”.³⁹

SLAPPs enable the wealthy and powerful to abuse British courts to silence the public, stymieing journalists, activists, and other environmental defenders from exposing evidence of criminal or unethical activity.⁴⁰ Over time, they result in self-censorship, narrow civic debate and constrain academic freedom, with damaging knock-on effects for the rule of law and democracy.



Left SLAPPs have been used against environmental activists seeking to expose environmental harms. Footage of the condition and treatment of farmed salmon filmed from his kayak by campaigner Don Staniford has been used by journalists and documentary film-makers. Various multinational companies who own fish farms in Scotland have sought to shut down this activity – carried out in the public interest – through obtaining interdicts or securing undertakings by Staniford to prevent him entering the farms that have left him on the hook for huge court costs.⁴¹

Photo: © Iain Masterson / Alamy

While the UK government passed a limited anti-SLAPP law in the Economic Crime and Corporate Transparency Act, this only relates to SLAPPs connected to economic crime, and falls short even for those who the new law is intended to protect as it is easy for claimants to side-step the provisions by pursuing a claim on a different matter.⁴²

B. Enabling whistleblowing

A lack of safeguards leave whistleblowers exposed to retaliation. With around 70% of whistleblowers who reach out to whistleblowing charity Protect for advice facing some form of retaliation (including dismissal, bullying, or even SLAPPs), a lack of protections is limiting the number of whistleblowers reporting environmental issues, raising the risk that environmental harm continues unabated.⁴³



Left Major scandals involving corruption and environmental harm have only come to light thanks to whistleblowers. Whistleblower Johannes Stefansson – the former Director of Operations in Namibia for Icelandic fishing company Samherji – exposed Samherji’s alleged involvement in corruption and bribery in fishing quota allocations.⁴⁴ The case was symptomatic of the “*catastrophic mismanagement*” of Namibia’s fish resources which has seen sardine stocks decline by 93% since 1991, with serious effects on planetary health.⁴⁵

Photo: © FB-StockPhoto-1 / Alamy

And while whistleblowers are an evidence gold mine for law enforcement where they are provided with strong legal safeguards that protect them against retaliation and ensure confidentiality, as well sometimes benefitting from generous rewards, progress on introducing greater protections alongside whistleblower incentivisation in the UK has so far been limited.

Recommendations

The UK Parliament and Holyrood should introduce robust standalone laws to establish universal protections against the abusive lawsuits known as ‘Strategic Lawsuits Against Public Participation’ (SLAPPs).

The UK government should introduce comprehensive protections and safeguards for whistleblowers, followed by financial incentives, to enable whistleblowers to disclose evidence of corruption and money laundering that facilitate environmental harm.

Increasing transparency and fairness in climate spending

At COP29, countries agreed to mobilise at least \$300 billion in climate finance per year for developing countries by 2035. They also agreed to scale up climate finance to developing countries from "*all public and private sources*" to \$1.3 trillion over the same time frame.⁴⁶

But the willingness of developed countries including the UK to meet these targets is open to question. The UK – which is the world's fifth largest historical emitter and the sixth largest economy – has proposed cutting climate finance from £11.6 billion over the last five years to £9 billion over the next five.⁴⁷ Successive cuts to Official Development Assistance ('ODA') have led to this overall decrease in climate finance, despite commitments by the UK and other countries to provide climate finance in addition to ODA commitments.⁴⁸ Equally, countries providing the bulk of climate finance may increasingly prioritise loans and mobilised private finance over grants, worsening developing countries' debt burdens.

A. Improving the state of climate finance transparency

In the face of this challenging context, it is more important than ever that every pound of climate finance is tracked and accounted for to make spending as effective and impactful as possible. But the generally poor state of climate finance reporting means that no one truly knows how much is being spent to address climate change. While limited transparency around public investment is not a problem unique to climate finance, the critical importance of climate finance to the future of the planet means high levels of transparency and accountability must be a priority.

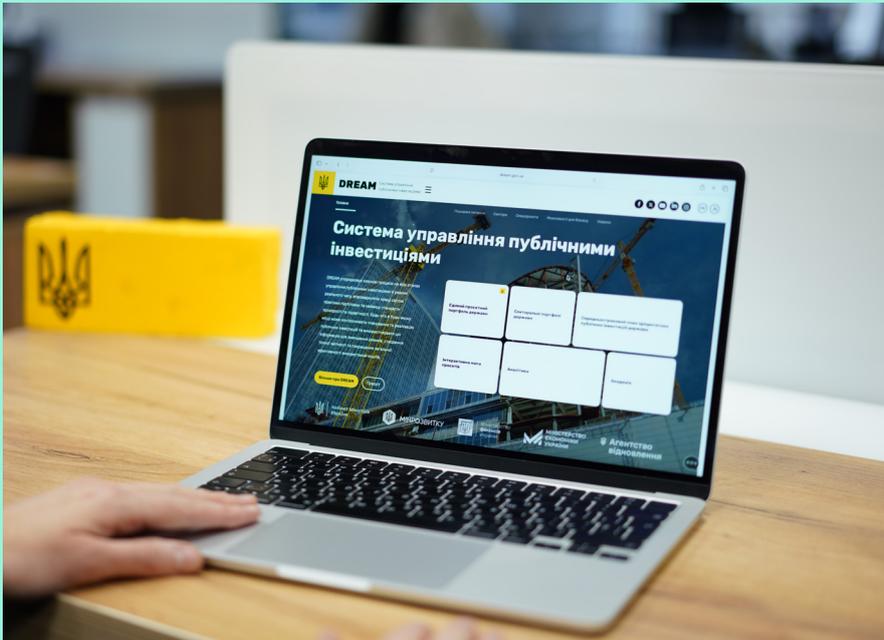
Publish What You Fund has pointed to a lack of standardised, accessible, and comparable climate finance data.⁴⁹ And as the One Campaign's Climate Finance Files highlight, the lack of standardised reporting rules, guidelines, or universal definitions of climate finance means that donor countries and international financial institutions essentially decide for themselves what is and is not climate finance.⁵⁰ The UK is a case in point: in 2023 it decided to allow more overseas development projects to be categorised as climate finance to avoid spending more money in order to reach its climate finance spending goal.⁵¹

B. Learning from anti-corruption efforts

Much better tracking of climate finance is within reach, with the One Campaign noting the "*incredible progress in our ability to track and share complex data*" enabling precise tracking of "*every dollar being spent on climate finance*".⁵² Research suggests that open, transparent, and comprehensive real-time data transparency platforms long championed by organisations like the Open Contracting Partnership could track and monitor climate projects and empower civil society and citizens to play a key role in enhancing the accountability of climate finance spending, saving billions of pounds each year.⁵³

As a major provider of climate finance and by virtue of the prominent role its financial sector plays in the mobilisation of private finance, the UK is in a strong position to advocate for much more transparency in climate finance. This would help deliver on a commitment from the 2025 UK Anti-Corruption Strategy to integrate public financial management systems as part of its role on the Taskforce for Access to Climate Finance.⁵⁴

The UK government should also support work to develop country platforms: coordination mechanisms that connect intra-government ministries with donors, financial partners, and other stakeholders, while aligning investments in climate finance and wider development goals with national priorities.⁵⁵



Left Ukraine's Digital Restoration Ecosystem for Accountable Management (DREAM) is an excellent example of a full transactional digital workflow for planning and delivering infrastructure projects, connecting across donors, government and communities. DREAM both allows donors to follow the money to build trust and allows communities to propose projects most valuable to them and to help them get support to deliver them: a two-way interaction that would be vital for any country's climate finance platform.⁵⁶

Photo: © DREAM / Government of Ukraine

C. Making polluters pay

Greater transparency in climate finance should be accompanied by measures that ensure those most responsible for climate breakdown pay their fair share in order to raise billions of vital revenue. In March 2026, 86 UK organisations sent an open letter to the Prime Minister calling on the government to introduce, targeted taxes on polluters - such as redirecting tax subsidies from the oil and gas industry and taxes on private jets and a frequent flyer levy - in order to secure an ambitious fourth round of UK international climate finance.⁵⁷

Recommendations

The UK government should support national platforms for tracking climate finance alongside higher reporting standards and transparency. These efforts should be underpinned by a tighter and credible international definition of what does and does not count as climate finance, and boosted by 'polluter pays' taxes.

The UK should also play a leadership role in ensuring countries apply the UN Conventions Against Corruption and Transnational Organised Crime to ensure the proper use and management of climate finance funds.⁵⁸

4

Enhancing corporate transparency

By bringing greater transparency over who ultimately owns, controls or benefits from companies, beneficial ownership registers provide critical information to help prevent and detect the misuse of companies that facilitate corruption, fraud, tax evasion and other illicit and criminal practices which are often directly connected to environmental harms. The UK has a responsibility to end the exploitation of the secrecy available through companies incorporated in some of the British Crown Dependencies and Overseas Territories which have long been used to place criminal profits beyond the reach of law enforcement or hide the identities of those who are directly involved in environmental harms.



Left Investigations by the Gecko Project, the Environmental Investigation Agency and Kaoem Telapak allege that secrecy jurisdictions in the UK's overseas territories including the British Virgin Islands have enabled the destruction of Indonesia's rainforests by concealing the ultimate beneficial owners of companies allegedly involved in large-scale deforestation. This has enabled those behind this deforestation to evade accountability while causing huge damage to fragile ecosystems inhabited by endangered species such as orangutans and exacerbating the climate crisis.⁵⁹

Photo: © Kaan Mika / Alamy

Successive UK governments have sought to work with the Crown Dependencies and Overseas Territories to address this problem, and empower them to open their beneficial ownership registers to greater scrutiny after all UK Overseas Territories and Crown Dependencies voluntarily committed in 2020 to introduce registers.⁶⁰

However, most Overseas Territories have used a ruling by the Court of Justice of the European Union – which found open registers to be a disproportionate infringement on privacy rights – to pause their efforts to introduce public registers and instead follow emerging standards in the EU.⁶¹ While these standards include granting access only to those who have a 'legitimate interest' in beneficial ownership information (such as journalists and NGOs), Transparency International UK notes that in practice these regimes are being developed in a piecemeal and inconsistent way, often falling short of EU standards.⁶²

Recommendation

The UK government should continue pressing UK Overseas Territories and Crown Dependencies to provide meaningful access to beneficial ownership data in line with previous commitments and with no further delay, which at the very least should align with the EU standards. At a minimum, journalists, civil society organisations, academics, obliged entities and law enforcement agencies should have open and searchable access to the data.

5

Overhauling the lobbying system

Major flaws in the UK's lobbying regime create significant transparency gaps around those seeking to influence economic decision-makers, while public interest groups are marginalised in engagement with ministers and senior officials.⁶³ This leaves public policy vulnerable to capture by vested interests, including by lobby groups seeking to undermine action against environmental harm.

For example:

- Fossil Free Parliament has found that fossil fuel lobby groups have privileged access to policymakers in government, compared to leading environmental, social justice and fuel poverty groups.⁶⁴
- Transparency International UK meanwhile highlights how one in 10 out of all UK and Scottish ministerial engagements are with just 10 companies, all of whom are either oil and gas majors, or involved in the generation and transmission of energy.⁶⁵
- Spotlight on Corruption has shown how business groups which provide the most corporate hospitality to government departments also get the most meetings with ministers and senior officials in those departments.⁶⁶
- Influence Map has found that weaknesses in the UK's lobbying regime are enabling “*strategic advocacy from a relatively narrow set of corporate interests*” that are the “*most adversely affected by progressive climate regulations*”, threatening the UK's transition to net zero.⁶⁷

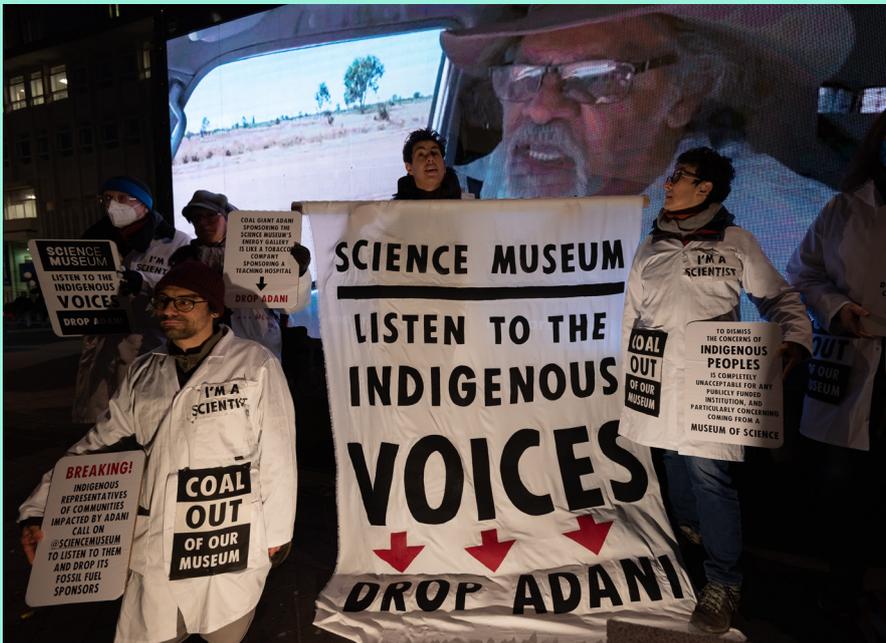


Left Data centres are likely to have a huge environmental impact – on water use, electricity generation, and carbon emissions – that speeds up global heating. So the UK government should be working with environmental groups to mitigate the impact of data centres on the environment, and challenging tech companies on their impact. Instead, research by Spotlight on Corruption indicates that the government is cosying up to big tech and ignoring environmental groups, holding not a single meeting with environmental NGOs on the impact of AI infrastructure on the environment since coming into office in July 2024 up to at least November 2025.⁶⁸

Photo: © QTS Data Centres / qtsdatacenters.com

The UK also plays a significant role in multilateral negotiations on climate and environmental policy, where a lack of transparency and accountability have allowed corporate influence to go unchecked. Analysis of the UN Framework Convention on Climate Change (UNFCCC) shows that 88% of companies attending COP28 and COP29 have not expressed a clear position in support of the Paris Agreement – the basis for all ongoing negotiations – since the beginning of 2024.⁶⁹

In addition to directly influencing policymakers through traditional forms of lobbying, vested interests involved in environmental harms may seek to exert influence through other routes including making donations to political parties, think tanks and sponsoring cultural institutions.



Left Adani Green Energy – a subsidiary of the Adani Group which is under investigation by the US authorities for alleged corruption and is the world's largest private coal developer – paid £4 million to sponsor the green energy wing of London's Science Museum.⁷⁰ According to Culture Unstained, the Adani Group leveraged its sponsorship to lobby the British government.⁷¹ Petitions coordinated by Ekō calling for several UK banks to end their funding of the Adani Group and for the banks themselves to be investigated, have so far gathered nearly 100,000 signatures.

Photo: © Ron Fassbender

Recommendation

The lobbying regime must be urgently updated to address vulnerabilities and loopholes and prevent the energy transition being delayed or derailed by vested interests involved in environmental harm. Internationally, the UK government should press the UNFCCC Secretariat to set high transparency and access standards for big polluters.

CONCLUSION

This manifesto has identified five areas of consensus, along with solution-oriented recommendations, for how anti-corruption efforts can help tackle environmental harm to promote a clean and green economy. If implemented, the manifesto's recommendations aim to support efforts to prevent biodiversity loss, address climate change, and support a just energy transition.

But this is only the beginning. Collaboration between anti-corruption campaigners and those working to protect the environment remains nascent. By pooling our expertise, we can achieve much more together than we can working in silos. We hope this marks the start of more regular cross-sectoral collaboration in the areas highlighted in this manifesto, and beyond.

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