DISCUSSION PAPER
"CORRUPTION AND CLIMATE CHANGE NEXUS IN THE ARAB REGION"

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Anti-Corruption and Integrity in the Arab Countries (ACIAC)

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List of acronyms

ACA	Anti-Corruption Agency
ASR	Arab States Region
BCG	Bahrain Coast Guard
DAC	Development Assistance Committee
CF	Climate Finance
CRDF	Climate-Related Development Finance
COC	Control of Corruption Index
COI	Conflict of Interest
CPI	Corruption Perceptions Index
FDI	Foreign Direct Investment
JETP	Just Energy Transitional Partnership
MENA	Middle East and North Africa
ODA	Overseas Development Assistance
UAE	United Arab Emirates
UNCAC	UN Convention Against Corruption
UNFCCC	UN Framework Convention on Climate Change
UNCTOC	Convention Against Transnational Organised Crime

1. Introduction

The Arab States Region (ASR)[1] is experiencing widespread negative impacts related to climate change. Rainfall in the southern and eastern Mediterranean, which was already the most water-scarce region on earth, decreased 30% between 1980-2022 and is forecast to continue to decline. Areas of the Arabian Peninsula are receiving *more* rain, but frequently via extreme weather events. Seas are getting warmer, sea levels are rising and everywhere is getting hotter, including longer heat waves and higher maximum temperatures. In 2023, Kuwait, Saudi Arabia and United Arab Emirates (UAE) recorded temperatures of 50° Celsius.[2]

These conditions are having a direct impact on ecosystems, communities and livelihoods. They are reducing water available for human consumption and agriculture, increasing desertification, creating dust storms (generating dangerous levels of airborne particulate matter), increasing the frequency and size of wildfires, reducing fish stocks, increasing flooding due to extreme rainfall, and accelerating coastal erosion. Water scarcity, compounded by mismanagement of water resources, is causing political and communal tensions. For example, in Iraq where by 2025 total water supply is projected to have declined by up to 60 percent compared to 2015[3], farmers are "deserting their lands and heading to urban slums—resulting in social and local political conflicts."[4]

Preserving and managing the environment in the context of climate change, is a major challenge for Arab states. The good news is that governments, communities, and civil society organisations (CSOs), often with support from the international community, are already responding by implementing initiatives to sustain human habitation, livelihoods and ecosystem maintenance. These initiatives are designed to be a buffer from the most severe impacts of climate change, allowing communities and ecosystems to adapt, survive and hopefully to thrive.

Corruption[5], however, is undermining progress. Case studies show how corruption impedes good environmental management practices and reform, drains scarce financial resources from initiatives, causes climate projects to achieve suboptimal outcomes or in some cases totally fail, and worsens the impacts of climate change. The specific environmental impacts of corruption include fresh water being illegally diverted for agriculture or polluted with hazardous wastes, sewage, and chemicals affecting communities that rely on it for drinking water; desertification of arable land due to corrupted environmental management or protection initiatives; coastal zones being plundered for sand or polluted, hastening erosion or threatening coral reefs, mangroves, wild fowl, and fish stocks; and illegal industrialization and urbanization—the latter sometimes driven by migration of drought- or conflict-afflicted rural communities or influxes of refugees and foreign workers—resulting in localised water and air pollution.

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[1] For the purposes of this paper, the 'Arab States Region' comprises 22 states: Algeria, Bahrain, Comoros, Djibouti, Egypt, Iraq, Jordan, Kuwait, Lebanon, Libya, Mauritania, Morocco, Oman, Palestine, Qatar, Saudi Arabia, Somalia, Sudan, Syria, Tunisia, United Arab Emirates (UAE), and Yemen.

[2] Livingstone, 2023. IEA, 2023; Fondazione CMCC, 2021; Herbersberg, 2016.

[3] Kool *et al*, 2020.

[4] Yassin, M., 2023. The Space for Iraqi Climate Activism is Dangerously Small, and Shrinking. Washington D.C.: The Century Foundation, 30 August 2023.

[5] Corruption is defined in this paper as "the abuse of entrusted power for private gain". Transparency International: see https://www.transparency.org/en/what-is-corruption.

Data outlined in *Section 2: Profile of the ASR's corruption/climate change nexus* suggests the ASR also fails to attract climate finance[6] (CF) at least in part because of corruption: despite being the most environmentally stressed region on earth, the ASR receives the less CF than any other global region. States that do not effectively control corruption, risk missing out on CF if donors perceive these will be more effective elsewhere. Funds from private investors, which are now equally important as a source of investment in the climate domain, may also be threatened.

Corruption also delays the energy transition across the ASR by reducing donor interest in signing Just Energy Transitional Partnerships (JETPs), and may constrain access to funds provided by the UN Framework Convention on Climate Change's (UNFCCC's) new Loss and Damage Finance Facility. More broadly, corruption undermines Arab states' efforts to achieve Sustainable Development Goals (SDGs) by reducing government effectiveness, eroding public trust and confidence in state institutions, distorting markets, stifling innovation, deepening inequalities, and increasing vulnerability to conflicts and crises (in addition to climate change).

This report profiles the ASR's vulnerability to climate change and corruption, then details entrée points for action in the corruption/climate change nexus, each entrée point including recommendations. Annex 1 describes seven case studies of the corruption/climate change nexus, and Annex 2 lists illustrative anti-corruption and environmental agencies and networks that exist across the ASR that could engage on issues related to this nexus.

1.1 Background to this paper

UNDP has a regional approach to support and facilitate measurable progress towards transparency and accountability. This approach is driven by Arab states' priorities and in recognition of the critical importance of governance, one of UNDP's "signature solutions" under its Strategic Plan (2022-2025). UNDP's regional project on 'Anti-Corruption and Integrity in Arab Countries' (ACIAC) contributes to the Strategic Plan by supporting the three directions of change: structural transformations (particularly green, inclusive and digital transformations), leaving no one behind (a rights-based approach centred on human agency and human development), and building resilience to respond to systemic uncertainty and risk (such as created by climate change).

The ACIAC project has a specific focus on the inclusive and effective implementation of the UN Convention against Corruption (UNCAC) and on tackling regional developmental challenges through enhanced transparency and accountability, such as peace and conflict, women's empowerment, youth engagement, private sector development and climate change. Building on the ACIAC's focus, this paper analyses the causal relationship between corruption and the failure or suboptimal performance of climate initiatives. Ensuring interventions focused on the corruption/climate change nexus are successful are an important element in UNDP assisting Arab states to achieve progress towards the SDGs, especially SDG 13 (related to climate action) and SDG 16 (related to peace, justice and strong institutions).

A key theme of the ACIAC project is identifying the impact of corrupted climate initiatives on maginalised populations and then supporting these populations to deal with these impacts. Such populations include women, youth, refugees and displaced people, land-users lacking legal ownership title, and religious and ethnic minorities, all of which typically have less social and economic capital within their communities.

[6] The UN Framework Convention on Climate Change (UNFCCC) defines climate finance as "local, national or transnational financing – drawn from public, private and alternative sources – that seeks to support mitigation and adaptation actions that will address climate change." UNFCCC, 2024.

Because marginalised people's choices and options are more constrained, they are more affected by environmental initiatives that fail to protect them from climate change. The case studies described in Annex 1 highlight how corrupted environmental initiatives can cause disproportionate harm to—or further marginalise—child labourers (Morocco), women and smallholders without legal land title (Tunisia), refugees and migrant labourers (Libya), internally displaced people (Iraq), and Indigenous people (Bahrain), as well as poorer communities in all cases.

1.2 Research methods and approach

Research for this paper involved:

- Identifying country-level data from respected indices to understand the correlation between corruption and environment-related vulnerabilities, and to help understand Arab states' varying vulnerabilities. Data were sourced from ND-GAIN's index (vulnerability to climate change), the Environmental Performance Index (for environmental management), the World Bank (for control of corruption), Transparency International (for perceptions of corruption), and the T-Index and Open Budget Survey (for information on transparency in governance). These indices allow comparisons that help indicate what is working well and in which countries, as well as where performance can be improved.

- Reviewing literature and websites to ensure the paper engages with established insights and knowledge, captures new developments, reflects institutional arrangements and civil society networks, and obtains information for qualitative descriptions of corruption, integrity controls, environmental management, and case studies. Literature reviewed included academic articles, media reports, government documents, 'grey literature' (e.g., from think-tanks and civil society organisations), and some of the ACIAC project's own knowledge products.

- Analysing patterns of CF distributed to the ASR based on the latest global data published by the Climate Policy Initiative (Buchner *et al.*, 2023a), as well as the subset of climate-related development finance (CRDF) in the form of overseas development assistance (ODA) as recorded in data collected by the OECD (2021).

- Identifying case studies of corruption from Arabic-, French-, and English-language literature. The case studies reference in this paper and outlined in detail at Annex 1, show how some authorities from a range of institutions—e.g., agricultural authorities, transport authorities, water agencies, environmental commissions, local governments, militaries, and police—engage in illegal behaviours that undermine the success of environmental initiatives. In these cases, corruption exacerbated the impacts of climate change on communities and ecosystems in multiple ways, including: coastal erosion—and associated degradation of natural assets for the tourist industry (Morocco; see A1.1); reducing water available for irrigation and human consumption, causing lower productivity on smallholder farms (Tunisia; see A1.2); the failure of infrastructure that should have protected communities from flooding, causing tens of thousands of deaths (Libya; see A1.3); and the failure of water treatment systems, causing over one hundred thousand people to be admitted to hospital (Iraq; see A1.4); and attempts by stakeholders to exert undue influence on climate policy makers (COP28, Dubai; see A1.5). Two additional cases show how integrity action has helped to reduce corruption risks: new controls to prevent criminality and corruption that previously facilitated illegal fishing in Bahrain (see A1.6); and an investigation into corrupted allocation of contracts to maintain and restore a precious historic site and ecosystem in Saudi Arabia (see A1.7). The case studies were selected to represent a range of countries and sectors

and their inclusion does not mean that corruption in these countries or sectors is more prevalent than elsewhere.

This paper's approach to preventing corruption encourages a *risk management approach* to identify, prioritize and manage negative outcomes, as well as to identify opportunities for improving environmental resources. Because climate change and CF crosses multiple sectors, specifying specific sectoral risks to be management by a single agency is too large a task – and in the climate domain it is unlikely that any single agency would even play such a role.[7] Despite this limitation, a risk management approach remains useful for identifying anti-corruption treatments to optimize climate investments.

Key audiences for this report are policymakers, public officials, and those overseeing donor and/or domestically funded CF. This focus is with a view to supporting more effective identification, analysis and response to the corruption/climate change nexus by the public, private and non-profit sectors.

[7] By contrast, where a sector is well-defined in terms of its institutions and affected stakeholders, it would make sense to advocate specific steps as part of a risk management approach. See, for example, UNDP's *Sectoral Corruption Risk Management: Implementation Guide for the Health Sector* (July 2021).

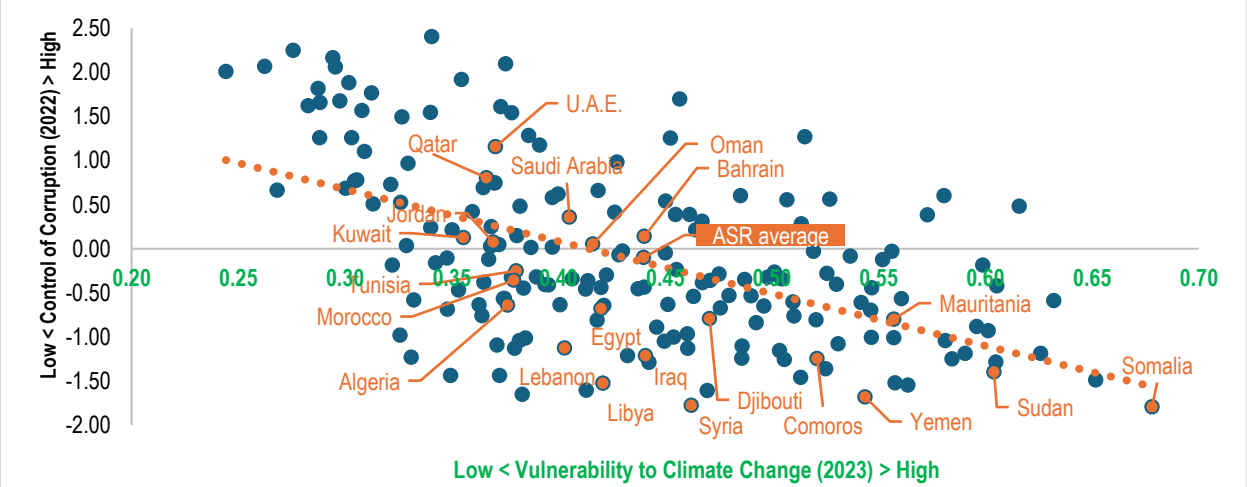
2. Profile of the ASR's corruption/climate change nexus

"Across the Arab region, the role of long-term environmental mismanagement in worsening the impacts of climate change is brutally clear" — this was the recent conclusion of two leading scholars of environmental management in the ASR.[8] The role of *corruption* in this worsening trend has also been confirmed by scholars (Khalfaoui et al, 2023; Sekrafi & Sghaier 2018a). Research from Mason (2022) and Taylor (2024) also linked corruption to specific negative environmental outcomes, as did the Lebanese Transparency Association, which produced exposés of how corruption (e.g., bribery of officials to ignore environmental violations) has contributed to pollution and over-extraction of Lebanon's longest river, the Litani River, with terrible consequences for human health.[9] In Tunisia, Hfaiedh & Bardi (2021) found that not only did corruption worsen environmental quality, but the combination of corruption and poor environmental quality attracted foreign direct investment (FDI) from companies seeking to avoid their own countries' more stringent regulations around polluting behaviour, i.e., poor standards and practices attracted foreign polluters.

Despite these studies, information about concrete examples of the corruption/climate change nexus across the region is hard to obtain because of poor transparency in governance (as is discussed in Section 2.1). The seven case studies outlined in **Annex 1**, partially fill this gap by providing details missing in much of the literature. They identify specific detail about how corruption specifically undermines environmental initiatives, worsening the impact of climate change.

Case studies showing how corruption causes environmental mismanagement and exacerbates vulnerability to climate change, are supported by data showing the statistically significant *correlation* between vulnerability to climate change and a state's poor performance on three governance indices. This is evident from the following three figures, which show correlation between vulnerability to climate change and the World Bank's Control of Corruption Index, Transparency International's Corruption Perceptions Index, and Mungiu-Pippidi's T-Index for governance transparency.

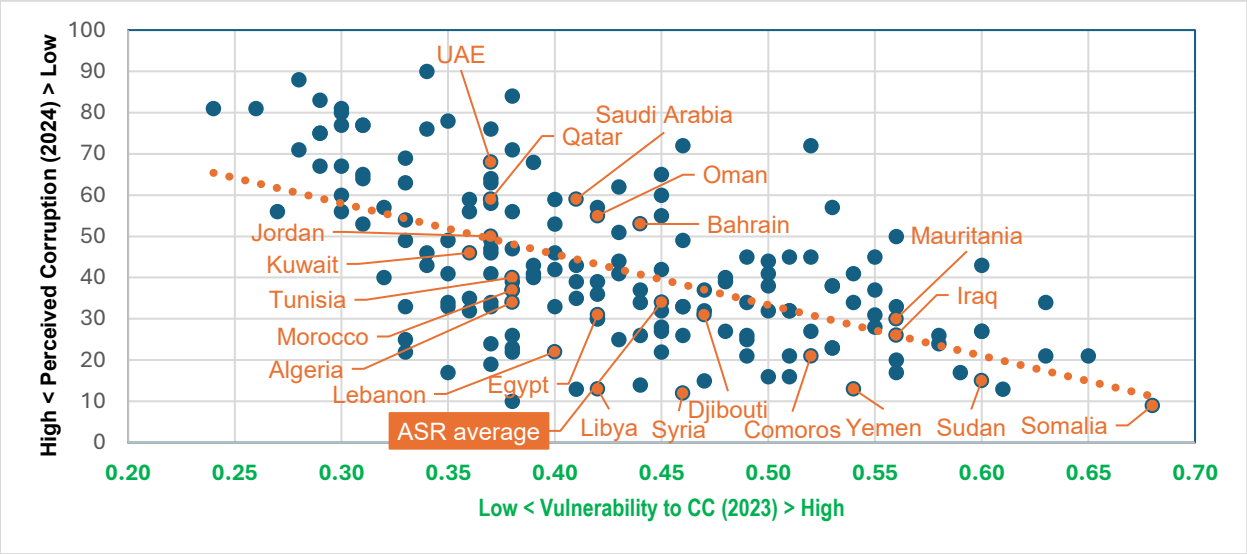
Fig. 1.1: Correlation: Vulnerability to Climate Change and Control of Corruption



Sources: Vulnerability to Climate Change (Chen et al. 2023); Control of Corruption (World Bank 2022). N = 185; p-value = <.001 (COC has a significant effect on vulnerability to climate change.)

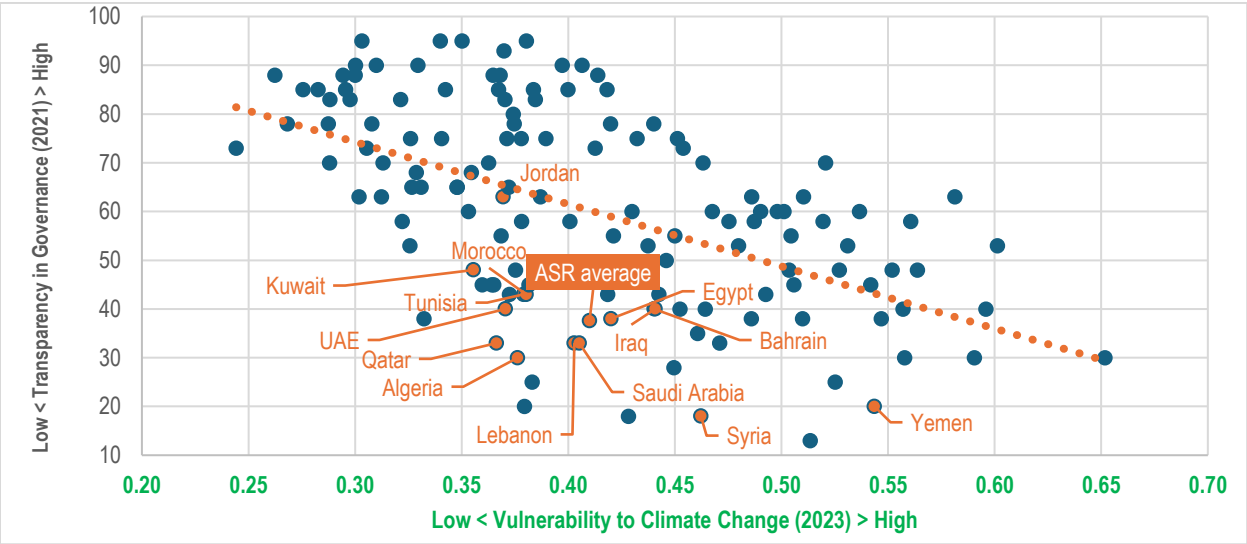
[8] See Lahn & Shapland, 2022: 3.
[9] Lebanese Transparency Association 2020.

Fig. 1.2: Correlation: Vulnerability to Climate Change and Perceived Corruption



Sources: Vulnerability to Climate Change (Chen et al. 2023); Perceived Corruption (Transparency International 2024). N=175; p-value = <.001. CPI has a significant effect on vulnerability to climate change.

Fig. 1.3: Correlation: Vulnerability to Climate Change and governance transparency



Sources: Vulnerability to Climate Change (Chen et al. 2023); transparency (T-Index; Mungiu-Pippidi 2023). N = 137; p-value = <.001. T-Index has a significant effect on vulnerability to climate change.

The data, as evident in Figures 1.1, 1.2. and 1.3 above, show that across all Arab states there is a strong negative correlation[10] between vulnerability to climate change and governance. I.e., vulnerability to climate change and poor integrity in governance go together. Furthermore:

- The nexus of climate change vulnerability and corruption based on any of the three governance indices, is worse for Arab states than for many other states or global regions.
- States within the ASR do not form a distinct group within the indices for perceptions of corruption (Fig. 1.1) or control of corruption (Fig. 1.2). That is, some Arab states do better and some do worse (total sample size is 175), but there is a spectrum of performance.
- However, Arab states do have a distinct profile for correlation between *transparency* in governance and vulnerability to climate change (Fig. 1.3), in that as a group they have markedly lower transparency in governance.

Table 1 shows where each of ASR member state is ranked within the decile-range of the World Bank's Control of Corruption Index (COC 2023), Transparency International's Corruption Perceptions Index (CPI 2023), and Mungiu-Pippidi's T-Index for transparency in government (2021). Better governance corresponds with ranking in higher deciles.

Table 1: Arab states' ranking by decile in three integrity indices[11] (*conflict-affected state)

Decile	COC, 2022 (n=185)	CPI, 2024 (n=175)	T-Index, 2021 (n=137)
1st (top)			
2nd	Qatar, UAE	UAE	
3rd	Saudi Arabia	Qatar, Saudi Arabia, Oman	
4th	Bahrain, Kuwait, Jordan, Oman	Bahrain, Jordan, Kuwait,	
5th	Tunisia	Tunisia	Jordan
6th	Morocco	Morocco	
7th	Algeria, Egypt, Palestine*	Algeria	Kuwait
8th	Djibouti, Mauritania	Djibouti, Egypt, Mauritania	Tunisia, Morocco
9th	Lebanon*, Iraq	Iraq, Lebanon*	Iraq, Bahrain, UAE, Egypt, Lebanon*, Qatar, Saudi Arabia
10th (bottom)	Comoros, Sudan*, Libya*, Yemen*, Syria*, Somalia*	Comoros, Sudan*, Libya*, Yemen*, Syria*, Somalia*	Algeria, Yemen*, Syria*

Sources: COC: World Bank 2023; T-Index: Mungiu-Pippidi 2021; CPI: Transparency International 2023.

In terms of corruption and its control, Arab states fall into three groups as shown in Table 1:

Group 1: States with capable institutions capable of investigating and preventing corruption (when allowed to do so), in which citizens and the private sector have some confidence. Three states are in this group: Qatar, Saudi Arabia and UAE.

[10] The correlation is statistically significant, with a p-value of <.001.

[11] CPI has no data for Palestine. T-Index has no data for Djibouti, Comoros, Libya, Mauritania, Oman, Palestine, Somalia, and Sudan.

Group 2: States with anti-corruption institutions in place that do not control corruption well and are not trusted by the private sector or citizens (as shown the corruption perceptions index). Eight states are in this group: Bahrain, Kuwait, Jordan, Oman, Tunisia, Morocco, Algeria, and Palestine.

Group 3: A group of 10 states with very weak anti-corruption institutional frameworks, in which few stakeholders have any confidence: Djibouti, Mauritania, Lebanon, Iraq, Comoros, Sudan, Libya, Yemen, Syria, and Somalia. Egypt sits across Groups 2 and 3.

Table 1 highlights multiple additional issues in the corruption/climate change nexus for Arab states:

- Arab states do particularly poorly on the T-Index (transparency in governance). Jordan, the highest ranked, only reaches the fifth decile.
- Conflict-affected states do poorly across all indices.
- Data collection—another element of transparency—is incomplete for all Arab States, which hinders climate action and environmental management and planning. For example, there are no T-Index data for Djibouti, Comoros, Libya, Mauritania, Oman, Palestine, Somalia, or Sudan, and there are no T-Index or CPI data for Palestine.

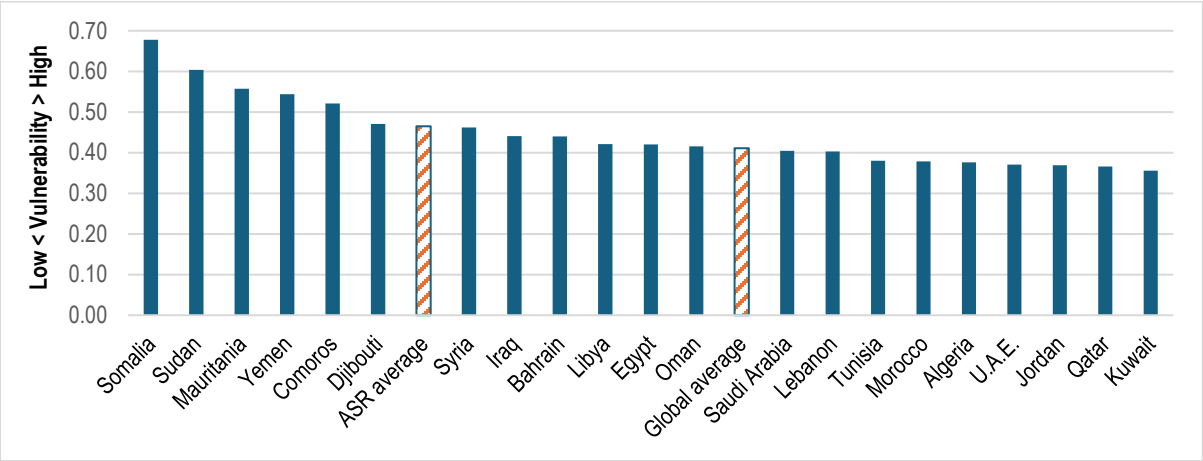
As will be discussed in Section 3, these groupings suggest certain strategies could be useful for addressing the corruption/climate change nexus:

- Legal and policy reform is important for groups 2 and 3, but less important for group 3 (which has few institutions capable of implementing any laws or policies.
- Where anti-corruption institutions are stronger and more trusted (e.g., group 1), bringing together stakeholders in environmental management with these institutions could be a productive entrée into promoting integrity in the environmental and climate sector.
- Support for a specific activity (e.g., transparency and fairness in water management) could be a useful starting point to build citizens' and private sector confidence, e.g., pilot programs for group 3 where trust in government could be built around an environmental issue tangible for citizens.
- For all three groups, advocating for the release of information about anti-corruption interventions in the climate domain that worked – and lessons learned from interventions that did not work so well – will help build knowledge about anti-corruption treatments and strategies to identify and implement those treatments.

2.1 Rankings in global climate and environmental indices

Arab states' ranking for global climate and environmental indices highlights what is at stake in the region if the impacts of climate change are worsened by corruption. Their basic vulnerability to climate change – including relative to other countries – is especially stark, as shown by Fig. 4.

Fig. 4: ASR vulnerability to climate change, 2021[12]



Source: ND-GAIN Index, Chen et al. 2023.

Fig. 4 suggests that some Arab states' lower vulnerability to climate change is because they are wealthy, such as Kuwait, U.A.E and Saudi Arabia. Wealth enables them to adapt to and mitigate the effects of climate change better. For example, they can build desalination plants to overcome limited renewable water resources or sea walls to protect against coastal flooding. However, while some countries' wealth will give them a buffer against the impact of climate change, it will not protect them from the effects themselves, some of which are more prominent or intense in the ASR compared to elsewhere. For example:

- **Higher temperatures**, which have increased two-and-a-half times faster in the ASR compared to the global average.[13]
- **Changing rainfall patterns**, which aggravated "existing water scarcity in some MENA countries, with droughts in Morocco in 2022 and Tunisia in 2023, while causing intense floods in 2022 in the UAE, Iran, Saudi Arabia, Qatar, Oman and Yemen."[14]
- **Desertification**, reducing arable land and exacerbating windblown dust. Dust is a major air pollutant those in Arab States with deserts, and is linked to stroke, heart disease, lung disease, respiratory diseases, and cancer. Seven Arab states are in the 20 worst countries for air pollution: Iraq (no.6), UAE (no.7), Egypt (no.9), Kuwait (no.11), Bahrain (no.12), Qatar (no.13), and Libya (no.20).[15]
- '**Medicanes'** – powerful Mediterranean storms causing flash flooding, coastal flooding, and wind damage – which "pose a significant threat to the Mediterranean basin, particularly coastal communities and infrastructure. As the climate continues to deteriorate and sea temperatures

[12] N=21. 2021 scores are not available for Palestine. For the global average, n=175.
[13] Lim 2023.
[14] Ibid.
[15] UNEP 2021.

rise, understanding, preparing for, and mitigating the impacts of these storms is becoming increasingly crucial".[16]

- **Rising sea levels** – it is projected that in 16 years (by 2040), some coastal areas of Libya, Egypt, Iraq, Kuwait, Saudi Arabia, Qatar, UAE, and Oman, will be below the annual flood level forcing millions of people to leave their homes without adaptive infrastructure.[17]

One consequence of extreme weather events that are more frequent and more intense due to climate change, is displacement of people. In 2022, 1,543,000 people were displaced across the ASR by weather-related disasters, such as drought, wildfires, floods, and storms. This number including 1.15 million people in Somalia who were displaced due to drought (75% of the ASR total); 171,000 in Yemen (11%; displaced due to floods and wildfires); 105,000 in Sudan (6.8%; floods); 51,000 in Iraq (3.3%; drought and wildfires); 23,000 in Mauritania (1.5%; floods); 21,000 in Syria (1.4%; storms); and 9,500 in Morocco (0.6%; wildfires).[18] As climate change intensifies, the number of people displaced by such events will grow. In conflict affected states, the ability of state authorities, NGOs or donors to respond to the impact of extreme weather events, is markedly worse than more stable states.

Good environmental management practices around *water* are particularly important for the ASR. Kuzma *et al.* found that 83% of people across the Middle East are "exposed to extremely high water-stress"[19]—the highest of any region in the world. In 2022, water was considered the most significant environmental challenge across all 12 countries surveyed for the Arab Barometer, although there was considerable variation: Tunisia (59% of respondents perceived water-stress to be the most significant challenge), Algeria (50%), Iraq (47%), Libya (47%), Palestine (47%), Egypt (45%), Jordan (44%), Mauritania (41%), Morocco (40%), Sudan (35%), Kuwait (33%), and Lebanon (32%).

Other measures of water-stress reinforce that water is a key environmental issue. With the exception of Iraq, Mauritania and Comoros, 19 states in the ASR have less than 18% of the global average of *renewable water resources* per inhabitant per year (the global average is 5,480m^3), and 13 of these have less than 8% of the global average.[20] Kuwait has a mere 0.09% of the global average (5 cubic metres per inhabitant per year) the lowest in the world, giving it a ranking of 185th (out of 185 states with renewable water resources). UAE has 15m^3 per inhabitant per year, the second lowest ranking at 184. By contrast Mauritania and Iraq (both outliers for the ASR), have 45% (2,452m^3) and 41% (2,234m^3) respectively of the global average of renewable water resources per inhabitant per year. Of the 20 states with the lowest renewable water resources per inhabitant globally, 70% (14 out of 20) are in the ASR.

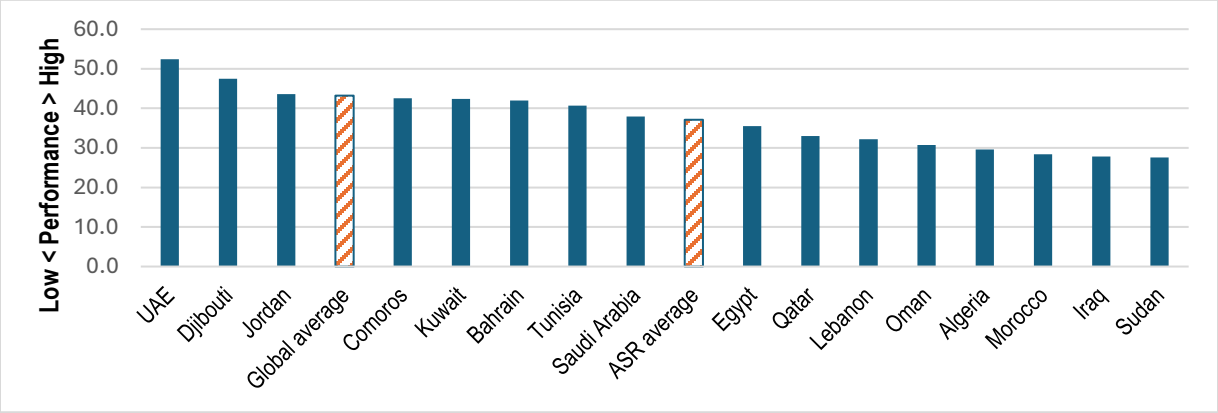
This section makes clear that Arab states are vulnerable to climate change and specific environmental issues like water scarcity. Unfortunately, it is also clear that Arab states perform poorly when managing their environment. Good environmental governance can better ensure initiatives are optimal: that is, well-

[16] Anderson 2023.
[17] Climate Central 2024.
[18] Internal Displacement Monitoring Centre, 2023: 137-140.
[19] Kuzma *et al.* 2023.
[20] 'Renewable water resources' are defined as water resources that "are rechargeable due to the hydrological cycle unless they are overexploited, comprising groundwater aquifers and surface water like rivers and lakes. Internal renewable water resources comprise the average annual flow of rivers and groundwater generated from endogenous precipitation" (see https://www.eea.europa.eu/help/glossary/eea-glossary). The FAO's AQUASTAT keeps data on renewable water resources for 199 jurisdictions, 14 of which have no such resources (these are very small island jurisdictions that rely on rainfall and imported water).

managed with judicious use of resources, and high standards of transparency and accountability around decision-making and use of public funds.

Fig. 5 shows data for Arab states from the global Environmental Performance Index (2022). Only UAE, Djibouti and Jordan have a better environmental performance than the global average; 13 perform worse than the global average.

Fig. 5: Arab States Region scores on Environmental Performance Index, 2022[21]



Source: Wolf et al. 2022.

Given the impact of climate change on Arab states, it is not surprising that ordinary people are concerned about the environment. The most recent Arab Barometer found that:

> …citizens recognize, and are concerned about, the environmental challenges facing the region. People across MENA agree that both citizens and governments contribute to these challenges. At the same time, the results show a broad support among citizens for more government actions in response to climate change. However, despite recognizing the existence and importance of climate change and environmental challenges, other more pressing and immediate issues take priority.[22]

Large-scale surveys of citizens in the ASR show they experience significant negative impacts from climate change. However, actual evidence about corruption and how it causes environmental management failures is frequently missing from discussions, reports, media coverage, and scholarly analyses on the environment. 'Corruption' is a pervasive – but frequently unsubstantiated – theme of many documents.[23] In some references the word 'corruption' is not even stated but is implied through observations about citizens' suspicions or mistrust towards government or powerful businesses. Such careful language may be used because of fears of retribution, especially on the part of national CSOs and media.

[21] Scores for 2022 are not available for Libya, Mauritania, Palestine, Somalia, Syria, or Yemen. For the global average, n=170.

[22] Mohamed 2022: 2-3. The 2022 Arab Barometer included data from only 12 states included in this report: Mauritania, Morocco, Algeria, Tunisia, Libya, Egypt, Sudan, Palestine, Jordan, Lebanon, Iraq, and Kuwait.

[23] For example, corruption is suggested or alleged, but not detailed, in literature by Al-Qassim (2023), Al-Saidi (2024), Alqattan *et al.* (2021), Aly (2023), Ayoub (2024), Benadad (2020), Bennett (2020), Carpentier (2022), Citizens for Bahrain (2015), Human Rights Watch (2019), Lahn & Shapland (2019), Shuker (2024), and Yee (2023).

Fortunately, effective anti-corruption organisations can, and occasionally do, take action when corruption is found on climate- or environment-related initiatives. See Annex 1 for two case studies from Bahrain (on illegal fishing) and Saudi Arabia (on detection and prosecution of a conflict of interest in an ecosystem development project) where government agencies are taking action on corruption that harms environmental management. In the Bahraini case, the broader systemic goal was to stop illegal fishing but specific objectives were the adoption of controls to reduce corruption that facilitates it. In the Saudi Arabian case, there were no allegations that corruption affecting ecosystem/site restoration and management was systemic. However, when alleged corruption was detected in the awarding contracts for these activities, swift action was taken.

2.2 A crisis in governance transparency

Transparency in governance – including environmental governance – is important because it assists in understanding and controlling undue influence over policymaking and for ensuring a just transition (for which multiple stakeholders, open discussion, and clear decision-making processes are critical). By contrast, a lack of transparency has negative effects on national development agendas. For example, a lack of information or understanding of process can catalyse an uncooperative outlook by citizens towards government, occurred in Tunisia:

> In Tunisia's highly polluted Gabès oasis, civil society is struggling to get access to information about the state of air, water and soil pollution and its effects on health and livelihoods. This lack of knowledge leads to fundamental suspicion by local populations of the state and private sector, severely hampering local development and contributing to social tension (Houdret *et al*. 2018: 3).

Lack of transparency is a major catalyst for popular, media and civil society speculation that corruption is a factor in initiatives that are ineffective or fail to produce fair outcomes. Such speculation erodes trust in public institutions and contributes to perceptions that paying bribes or offering gifts is widespread and 'normal' (further embedding systemic corruption). Lack of transparency also distorts markets by discouraging *honest* suppliers and encouraging *dishonest* suppliers (who build the cost of corruption into their operating expenses, forcing up the price of goods and services).[24] In some cases, compromised environmental or climate initiatives may not have involved corruption, but without definitive communication by respected authorities about what caused perceived poor outcomes—especially in contexts where corruption is perceived to be systemic or, indeed, *is* systemic—trust in governance and markets will be undermined.

Arab states' limited transparency in governance is reinforced by the International Budget Partnership's Open Budget Survey, 2015-2021, of 11 states.[25] As a region, Arab states were 10 points behind the second worst performing region (Sub-Saharan Africa) and scored less than half the points of other regions and a third of the points of Western Europe, U.S. & Canada. Only one of the 11 states (Jordan) scored in the 'substantial transparency' bracket; five states had virtually no transparency over government budgets (Algeria, Iraq, Lebanon, Qatar, and Sudan). Although CF from public providers can be monitored through mechanisms and documents made available by donors, it is often disbursed through recipients' institutions. Frequently there are also matching domestic funds from the recipient country. A recipient

[24] Cislaghi and Heise, 2018; Peiffer, 2017; Walton and Peiffer, 2015; Walton and Peiffer, 2017.
[25] Algeria, Egypt, Iraq, Jordan, Lebanon, Morocco, Qatar, Saudi Arabia, Sudan, Tunisia, and Yemen. See Frank *et al.* (2023).

state's lack of transparency around its regular budget will, therefore, affect transparency around these matching investments.

Finally, case study information about the corruption/climate change nexus is more available in countries that have freer media or CSOs, or that have anti-corruption agencies (ACAs) that publish reports of arrests, charges and investigations. Such transparency is indispensable for educating governments, communities and organisations about the corruption/climate change nexus, and a major area for reform recommended by this report.

2.3 Unchecked undue influence

Undue influence in the climate domain typically involves the private sector, especially large corporations, trying to protect coal, oil or gas interests by influencing policymakers' decisions around climate finance and climate policy, e.g., around subsidies for fossil fuels, transition timetables to renewables, or the scope of public debate around energy questions.

Undue influence can be difficult to categorise as 'corruption' as it is frequently not illegal in itself, but it is underpinned by undeclared and unmanaged conflicts of interests on the part of fossil fuel corporations and the officials and politicians they lobby.[26] Lack of transparency and accountability around climate policymaking enables undue influence, because it enables off-the-record meetings to occur and officials who meet with corporate representatives in such conditions never need to explain what they are doing. In turn, such secrecy can enable corrupt behaviours such as bribery and illegal gratuities. The end result is a system of lobbying involving asymmetrical influence whereby rich powerful stakeholders obtain access to decision-makers and crowd out other voices.

The case study in Annex 1 on undue influence by fossil fuel companies at COP28 in Dubai, UAE, captures these concerns (see A1.5). Just prior to COP28 in Dubai, the European Parliament even adopted a resolution warning about "undue influence from corporate actors with proven vested interests" on COP28 delegates.[27] CSOs and poorer smaller states vulnerable to climate change who have witnessed corporations influence the highest level of climate policymaking, such as at the UNFCCC's Conferences of the Parties (COP), are particularly alarmed by undue influence.

2.4 Poor conditions for climate investment

Global CF, including both public and private sources, reached $1.27 trillion in 2021-2022.[28] Most CF goes to mitigation initiatives ($1.15 trillion; 91.3%), with adaptation initiatives receiving $63bn (5.0%), and dual-use initiatives $51bn (3.5%). Yet, Buchner *et al.'s* the Middle East and North Africa (MENA) region receives only 1.4% of total global CF (see **Table 2**). Oceania is the only region that receives less than MENA, but Oceania has around 6% of the population of the MENA region (around 35 million versus over 500 million) which means that Oceania receives far more global CF per capita.

Table 2: Total global climate finance by region of destination (domestic and international)

[26] Note that in some jurisdictions not declaring a conflict of interest may be considered a corrupt act.
[27] European Parliament, Resolution of 21 November 2023 on the UN Climate Change Conference 2023 in Dubai, United Arab Emirates (COP28) (2023/2636(RSP)). See Clause 31.
[28] Buchner *et al.*, 2023a. All dollars are US dollars. Buchner *et al.*'s reported CF global total is $1,265bn. As explained in their methodology report (2023b), this figure is based on biennial averages (taken to 'smooth' the data). However, Buchner *et al*. also provide data annually (see Table A1 in Annex I: Data Tables, p.43) and the reported total for 2022 is $1,415bn, which is the figure used for Table 4.

Region	CF, millions (2022)	% of Total CF (2022)
East Asia and Pacific	660	46.7
Western Europe	338	23.9
US and Canada	190	13.4
Latin America and the Caribbean	59	4.2
South Asia	50	3.5
Central Asia and Eastern Europe	36	2.5
Sub-Saharan Africa	34	2.4
Middle East and North Africa	**20**	**1.4**
Other Oceania	15	1.1
Transregional	12	0.8
Total	**1414**	**99.9**

Source: Table A.10, Buchner *et al.* 2023a: 47.

These CR data, as well as data on climate-related development finance (CRDF) as categorised by the OECD's Development Assistance Committee, show that Arab states are relatively insignificant recipients of both CF and CRDF. The flows of CF and CRDF to other regions, and the extent of need given Arab states' vulnerability to climate change, suggests that corruption may be a factor in this pattern. Thus, not only is corruption attracting 'bad investors' in the form of foreign companies seeking Arab hosts with lower standards for pollution to avoid costs back home (as reported by Hfaiedh & Bardi for Tunisia earlier in this section), but corruption across the ASR is also deterring 'good investors' that may otherwise be interested in mitigation and adaptation projects.

In regard to CRDF, total CRDF in 2021 was $97.5bn (only 7.7% of all global CF flows in the 2021-2022 period). Although Arab states receive a larger percentage of CRDF compared to global CF, it is still a small proportion: 7.8% of CRDF compared to 1.4% of global CF. See **Table 3** for CRDF receipts by ASR member.[29]

Table 3: CRDF distributions to Arab States, 2021

Country	CRDF, 2021 (USD)	% for Mitigation	% for Adaptation	% for Dual Purposes
Egypt	2,714,184,071	78.5	18.7	2.8
Morocco	1,393,649,541	19.6	64.9	15.6
Jordan	717,023,036	20.7	64.7	14.6
Sudan	637,206,299	54.2	42.8	3.0
Iraq	470,295,427	63.8	31.9	4.2
Somalia	403,959,029	25.8	70.8	3.4
Tunisia	385,265,628	18.4	53.8	27.7
Yemen	288,982,704	19.5	62.0	17.6
Palestine	143,917,356	14.1	58.7	27.2
Lebanon	130,036,752	11.7	82.6	5.6
Mauritania	106,175,869	18.4	72.0	9.6
Djibouti	93,171,105	4.3	95.0	0.7
Syria	78,719,336	0.1	99.1	0.8
Comoros	27,651,798	0.2	98.6	1.2

[29] Note there is not an exact overlap of Arab states receiving CRDF as categorised by the OECD's DAC, and the 'Middle East and North Africa' (MENA) regional category used by Bucher *et al.* 2023. The OECD's category includes 16 recipients (Bahrain, Kuwait, Oman, Qatar, Saudi Arabia, and UAE do not receive ODA). Buchner *et al.'s* category includes Israel and Iran, but not Comoros, Djibouti, Mauritania, Somalia, or Sudan. These are in her 'Sub-Saharan Africa' region (2023b: 22).

Libya	21,587,385	34.4	59.9	5.8
Algeria	10,790,775	13.2	78.8	8.1
Total	**7,622,616,111**	**45.9**	**45.4**	**8.8**

Sources: OECD DAC, 2021

Aside from deterring investment in the form of CF and CRDF, corruption undermines the outcomes of adaptation and mitigation projects, and delays the energy transition. Analysis of Tables 3 and 4 raises several issues in this regard:

- Public and private sources may be willing to provide more global CF to the ASR than the current $20bn, if Arab States can reduce corruption.
- Because donors have discretion about where to invest CRDF in mitigation projects—recalling that emissions can be reduced anywhere in the world—Arab states risk losing mitigation funding if they cannot control corruption. Conversely, Arab states that can better control corruption may attract *more* CRDF mitigation funding if they improve control of corruption.
- Adaptation funding is largely oriented towards need. I.e., support to reduce the harmful impacts of climate change. While many donors will have tranches of funding dedicated to Arab States, the need for such projects is global. Perceptions of corruption may encourage donors to invest in adaptation projects elsewhere, or to concentrate adaptation funding in Arab States where it can be most effectively disbursed, i.e., with reduced risks for corruption.

Mitigation of emissions is an 'optimisation game': reduction initiatives can occur anywhere in the world and therefore what matters (for mitigation purposes) is that investments are used where they will have greatest effect. This means CF providers can choose to direct mitigation-related investments to the most optimal jurisdictions for 'climatically strategic' reasons. For example, if Country A and Country B produce the same emissions but Country B is less corrupt, an emissions reduction project in Country B is likely to reduce emissions more than if it were in Country A. CF providers know this and will make these kinds of choices. Arab states that receive a large portion of CRDF focused on mitigation, but which cannot effectively control corruption, are vulnerable to mitigation funds being redirected to jurisdictions where it will be better used. Egypt, Iraq and Sudan are most vulnerable in this regard because they score poorly for corruption control (as is shown by Table 3) and more than half their CRDF is mitigation-focused (as is shown by Table 5): 78.5% for Egypt, 63.8% for Iraq and 54.2% for Sudan.

A new model of CF is Just Energy Transition Partnership (JETP). JETPs are designed to help developing economies to make a just transition by replacing old coal-fired power stations with renewable energy.[30] JETPs enable recipients to reduce GHG emissions while stimulating economic growth, jobs and development of a renewable energy sector. Most countries that have signed JETPs are not major GHG emitters, and they are therefore unlikely to receive more CF given 91% of the latter is currently concentrated on mitigation activities.[31] Arab states such as Morocco and Egypt fit the profile of a JETP candidate country, but CF providers may be reluctant to sign agreements with them unless they can demonstrate better control of corruption risks.

[30] Kramer (2022a) and Seiler (2023).

[31] India and Indonesia, both of which have signed JETPs, are exceptions in that in 2020 they were the world's third and sixth largest GHG emitters respectively. However, other countries that have signed JETPs each contributed one percent or less emissions of the 2020 global total: South Africa was no.17 (1.07% of total global emissions), Vietnam no.19, Pakistan no.21, Kazakhstan was no.30, Philippines no.38, and Senegal no.108 (Climate Watch 2024).

A second new CF initiative, operationalised at COP28 in Dubai in 2023, is the Loss & Development Finance Facility (LDFF). The LDFF is designed to compensate the poorest developing countries—countries that have contributed the least to the climate crisis—for damage already incurred due to climate change (rather than provide investments to enable adaptation for future damage).[32] Examples of loss and damage are communities that have already had to relocate due to desertification or rising sea levels affecting coastal lands, or reduction in freshwater resources due to shrinking glaciers. The LDFF will provide new grants (not loans, and not funds already designated for mitigation or adaptation purposes) to rebuild physical and social infrastructure.

Contributions to the LDFF have been already made by countries in the Global North and UAE (and Saudi Arabia and China may follow).[33] Given poor integrity in governance in the ASR, donors may consider Arab states to be low priorities for LDFF grants notwithstanding the real harm they have suffered from climate change. Quite simply, donors do not want their money embezzled or mismanaged, and the organisation that eventually administers the LDFF will want to minimise corruption-related risks (possibly by recommending initial disbursements only to states that demonstrate adherence to certain standards). The LDFF may become another instance of corruption deterring CF allocations to the ASR. Arab states that open their institutions and programmes to scrutiny and monitoring of LDFF grants by CSOs, will be more likely to receive such funds.

[32] Bhandari (2024).

[33] As of December 2023, $700 million had been pledged by Denmark, Canada, France, Germany, Japan, Ireland, Italy, Norway, Slovenia, United Arab Emirates, and USA, although this far less than estimated needs (Lahkani 2023).

3. Entrée points for climate action

There are challenges for promoting integrity in the climate domain given Arab states' corruption profile, their vulnerability to climate change, what the identified cases from the ASR at Annex 1 tell us about how corruption causes climate initiatives to fail, and the gaps in the organisational landscape (as illustrated in Annex 2). This section describes key challenges and makes recommendations to address these while minimising any associated risks from such action.

As shown by the table of illustrative anti-corruption and environmental bodies at **Annex 2**, the ASR has institutions and organisations that work in the climate and anti-corruption domains. Annex 2 is not an exhaustive list: there are too many agencies and non-state stakeholders without a significant presence on the internet (which makes them hard to identify) to list all those that exist. Nevertheless, it indicates the range and types of organisations available as potential partners to plan, design, fund and implement initiatives focused on the corruption/climate change nexus.

The private sector and CSOs also have particularly important roles to play across all the entrée points described in this section. These stakeholders frequently observe and understand the impacts of climate change or environmental mismanagement before officials do (especially in states that are centralised administratively); they have channels of communication with communities that are more trusted and reliable than those of governments; and they often communicate better than official authorities. Multilateral organisations, especially regional organisations with language, cultural and political familiarity with states, can provide support in the form of through resources and technical input to these stakeholders.

The guiding assumption behind recommendations for each entrée point, is that participation by non-state stakeholders in planning, designing and implementing initiatives helps to manage risks for corruption in the climate change and environmental domains. Participation by non-state stakeholders is important for three reasons:

- **Reducing harm**: including non-state stakeholders makes it more likely that initiatives focused on corruption in the climate domain will avoid harm to communities or businesses. This is partly because free, prior and informed consent would have been obtained where initiatives involve community lands.
- **Optimising outcomes:** non-state stakeholders' involvement in planning, design and implementation will more likely ensure positive outcomes, because initiatives will reflect the needs of those most affected by corruption and climate change.
- **Identifying problems:** giving non-state stakeholders access to information (i.e., enabling transparency) and creating channels for non-state stakeholders to provide feedback and monitor progress (i.e., enabling accountability) ensures rapid identification and reporting of problems, including corruption but also poor outcomes generally.

3.1 Corruption risk management as a foundational approach

A risk management approach to the corruption/climate change nexus *when done well*[34], promotes collaboration between stakeholders and therefore also encourages them to understand each other's perspectives on (1) the *likelihood* of a corruption 'event' that could jeopardize climate initiatives and (2) the *impact* of such an event. Such a collaborative approach is more likely to identify optimal treatments

[34] Such an approach would require those responsible for investing climate and environment funds to be trained in how to do risk management in accordance with the global standard, ISO 31000.

for addressing the corruption/climate change nexus, compared to stakeholders working in isolation or simply reacting to corruption after it occurs (i.e., initiating a legal response). For example, in the case of the impact of increased airborne particulates caused by more frequent dust storms for example, state authorities may emphasize reduction in illnesses caused by increasing dust storms and clean-up costs, whereas profit-oriented businesses may focus on reduced workforce productivity or reduced profitability of investments (such as in tourism or agriculture).

One difference with using a risk management approach to address the corruption/climate change nexus compared to discrete sectors dominated by a single institution, such as education or health, is that there is no obvious 'lead' institution for climate change. An ACA is unlikely to be the lead agency for climate initiatives due to its lack of technical knowledge about these issues; adaptation initiatives could be led by numerous agencies (e.g., a city authority or departments of infrastructure or agriculture); and mitigation initiatives could be led by departments of forestry, natural resources, environment, industry, or energy. Therefore, while capacity building in using a corruption risk management approach for all of these agencies is possible, it is probably not feasible given it would involve a whole-of-government approach that may be too complex to broker through any single climate project. By contrast, a climate initiative that brings stakeholders together and uses the standard processes of identifying, assessing, prioritizing, and identifying treatments for risks, could be the catalyst for improved communication, transparency and decision-making for that initiative.

Recommendation 1: Use a collaborative risk management approach to identify the optimal treatments for addressing the corruption/climate change nexus.

A risk management approach that aims to change the behaviour of individuals, communities, businesses, and organizational stakeholders as part of either adaptation or mitigation initiatives, needs to be grounded in evidence. Obtaining evidence requires research about knowledge, attitudes and practices relating to corruption, climate change and the environment, but preliminary research suggests that attitudes across the ASR are diverse and complex.

A survey in 2022 of Jordanians found that 46.2% had never heard of climate change (43% of male respondents and 50% of female respondents).[35] This suggests that using climate change as a 'hook' for engagement with the general public in some states is unlikely to be effective. The same survey found that 57.8% of those who knew about climate change, thought that "nothing could be done to tackle [it]" (38% of male respondents and 54% of female respondents), which increased to 69% of individuals who had lower than secondary education. The percentage of individuals who have taken action out of concern for climate change was low across all employment status types, but students were most likely (14%)—and twice as likely as the next category (employed people)—to respond that they ˆtaken action.[36]

Social media was the main method of getting information about climate change for 64.1% of respondents, followed by televsion (26.2%), and news channel websites (6%).[37] Radio, newspapers and 'other' were all less than 1%. Respondents generally preferred to receive with information about climate change from scientists (51.3% had this preference), followed by environmental organisations (22.5%). The only variation on this pattern was that the second preference for receiving information about climate change by

[35] NAMA 2023: slide 8.
[36] Ibid, slides 21-22.
[37] Ibid, slide 29.

respondents with less than secondary education, was government (26%). Four percent or less wanted such information from the United Nations and two percent or less wanted it from educations.

Caution should be used when extrapolating survey results from one country to others, as media coverage, gender, urban/rural divisions, means of obtaining information, educational levels, and household wealth are all variables influencing levels of knowledge, attitudes, beliefs, and understanding of climate change, and these vary greatly across the ASR. Nonetheless, the survey results from Jordan suggest specific content that could be useful in engaging the public:

- Research and surveys should be used to develop messages for key audiences and provide evidence around knowledge and attitudes for a risk management approach. A 'cookie cutter' approach to public communication across the ASR is likely to fail.
- Case studies of successful well-governed environmental management initiatives that could influence opinion and galvanise anti-corruption action and better environmental management, can be useful to show that *something can be done*.
- The form of communication should depend on the target audience, but social media, followed by television, is likely to be most effective. Radio could be useful in certain countries with higher use of radio and less internet connectivity, e.g, Somalia or Yemen.
- Students are already more likely to have taken action on environmental issues. Engaging with students around good environmental management practices (including anti-corruption efforts), may therefore be a productive area for action. I.e., engage with a cohort that is already motivated and engaged.
- Care should be taken in *who* delivers messages about environmental management, especially if connected to corruption. Research shows that governments, the UN and educators may not be the most effective voices if the target audience is the general public. Messaging delivered by these interlocutors can feed perceptions that good environmental management, climate change and corruption are global problems that ordinary people cannot influence. Instead, messages should be delivered by scientists and/or environmental organizations. Messages to less-educated poorer people could be delivered by government (as well as scientists and environmental organisations), but messages delivered by government alone are unlikely to be effective for educated audiences.

Recommendation 2: Research what public education messages and what media are likely to work best with different demographic groups across the ASR.

- Develop public education strategies that include a 'theory of change' around how the messages are supposed to translate into attitudinal and behavioural change toward the corruption/climate change nexus.

3.2 Build on existing civic space

Local communities and civic organisations are 'eyes and ears' on the ground in terms of detecting and caring about environmental mismanagement. These stakeholders often have good understandings of constraints on the use of local resources having worked with these resources (e.g., water, fish or forests) for hundreds, if not thousands, of years. The case studies at Annex 1 about Morrocco (see A1.1) and Tunisia (see A1.2) highlight local communities' understanding of environmental problems, ability to identify solutions to mismanagement, and their important role in reporting corruption.

However, community organisations and CSOs face constraints on their ability to participate as stakeholders in the corruption/climate change nexus. Yassin (2023), writing about Iraq, argues that NGOs and civil society are:

> … inexperienced and, at times, disorganized. And while environmental NGOs have had some success in attracting support from international funders, these activists' enemies are casting them as stooges for foreign interests and values. Meanwhile, the effectiveness of activism is hamstrung by political instability. Worse, environmental activists are increasingly coming under attack, and even killed.[38]

Creating channels for non-state stakeholders to safely report grievances and allegations, is critical for authorities to learn about environmental mismanagement and to respond. Fortunately, in some states the readiness by non-state actors to …

> … complain about the negative impacts of bad environmental governance is high. Claims for effective access to information are among their key demands. Governments have partly reacted to these requests, such as with new constitutions in Morocco (2011) and Tunisia (2014), which promise more democratic governance, including participative, accountable and transparent decision-making. However, in many cases implementation is slow; socio-economic and environmental problems are persisting and, subsequently, the governments' legitimacy is at stake.[39]

In states where civil society and communities are already primed to discuss more participative, accountable and transparent policymaking, it will be easier to create multistakeholder forums on the corruption/climate change nexus. However, *which* CSOs or community organisations have the potential to engage on these issues, depends on many political and security factors, including prevailing freedom of expression, institutional stability, basic personal safety, and support from the public, national and international NGOs, and donors. Several Arab states face challenges in this regard, with non-state stakeholders being hindered in their ability to participate fully in policy discussions or implementation of initiatives, e.g., Libya, Iraq, Palestine, Somalia, Syria, and Yemen are particularly affected, partly because of the conflicted and violent conditions they are currently experiencing.

Even in these states, however, there is some civic space as is shown by the enduring presence of some CSOs focused on corruption and/or the environment. Efforts to engage CSOs in such states should commence with a security and safety assessment of whether reaching out will cause them harm. Engagement on environmental issues is much less likely to endanger individuals compared to engagement on corruption issues.

Recommendation 3: Organisations planning, supporting or hosting corruption and climate integrity events should do a security risk assessment when identifying potential non-state participants.

- The assessment should include asking stakeholders their own views on risks regarding their participation.

[38] Maha Yassin, The Space for Iraqi Climate Activism is Dangerously Small, and Shrinking. Washington D.C.: The Century Foundation, 30 August 2023.
[39] Houdret *et al.* (2018).

One problem for engaging non-state stakeholders, may be their reluctance to engage outside established sector(s) of expertise or with state institutions. A UN report on the water crisis in Tunisia, found that "in many communities the boards of agrarian development groups [which have a major focus on managing water resources] were vacant since no one wanted to take part." This reluctance is driven by perceptions that these groups were plagued by corruption and clientelism, and being elected to the board would taint the reputation of anyone who participated (Agudo 2022; para. 28).

The poor reputation of state-sponsored initiatives in some countries, combined with constraints on civic space for non-state actors (whether CSOs and private sector), create challenges for any kind of multi-stakeholder engagement. For example, environmentally focused CSOs and community groups are the logical be the key stakeholders to inform state institutions of local perspectives and knowledge about environment-related issues. However, they may be unfamiliar and uncomfortable in discussions with anti-corruption authorities—and they may also not be received seriously or respectfully. Business groups can play a role in this respect. The private sector is directly affected by both corruption (e.g., increased costs due to bribery or missing out of tenders due to nepotism) and the impacts of climate change (e.g., water shortages, energy grid overload during heatwaves, or low employee productivity due to elevated heat or pollution). Whether non-state stakeholders are from the private sector or environmental sector, they will likely value support and possibly some guidance in entering a civic space as fraught as anti-corruption work.

Another key challenge will be engaging with marginalised populations who may have little presence in civic space, e.g., women, youth, refugees and displaced people, land-users lacking legal ownership title, and religious and ethnic minorities. These populations can be identified and mapped. E.g., who they are and where they are? What languages are best for engagement? Are there existing organisations that represent their interests? What are the specific harms they face from both corruption and climate change?

Recommendation 5: Identify and map marginalized populations within the ASR and how they are specifically affected by the corruption/climate change nexus.

Recommendation 6: Use case studies of marginalized populations' specific vulnerability to educate other state and non-state stakeholders about the need for tailored solutions and communication strategies to both environmental mismanagement and to climate change adaptation initiatives.

- At a minimum, these solutions should do no harm.

Recommendation 7: Forums focusing on the corruption/climate change nexus should involve representatives from marginalized populations able to explain their context and/or propose actions.

One way to ensure marginalised populations, especially women, are included in discussions and programme design, can be borrowed from Transparency International's recent *Climate and Corruption Atlas: Lessons from Real-World Cases*.[40] It recommends that initiatives intended to promote dialogue around the corruption/climate change nexus, should always include agenda items or activities focused on reducing economic inequality and improving the economic status of women. A specific focus on women

[40] Nest 2024: 17.

is important simply because gender status is such an important factor in who is most affected by climate change.

Recommendation 8: Forums, discussions and programmes focusing on the corruption/climate change nexus, should adopt a policy that specifically focuses on measures to improve women's economic status and to reduce economic inequality.

It is not only non-state stakeholders that may be reluctant to engage on the corruption/climate change nexus. State officials may be similarly reluctant, either because of the topic or because of a general reluctance to engage in *any* reforms. De Soysa (2022: 3), who uses the term *duty-bearers* to describe a broad range of individuals holding some form of authority from unelected bureaucrats to elected politicians to public officials working in specific departments, but also potentially including religious or community leaders, argues:

> Certain duty-bearers may be averse to reform as they benefit from the status-quo; some may fear political alienation and blowback if they throw their weight behind a contested reform process; others still may be reluctant to engage with civil society as they operate in environments openly hostile to non-governmental organisations.

The hostility towards NGOs referenced by de Soysa may be institutional or even official policy, rather than personal, but duty bearers across the ASR may be stuck in this dynamic whether they like it or not. In such an environment, state agencies or even specific individuals who are more open to engagement with CSOs or known to be sympathetic to environmental and/or anticorruption issues, can be mapped along with the best level of government with which to engage (e.g., national, provincial or local?). The best time to attempt engagement should also identified (busy times for government business, whatever the sector, should be avoided), as well as multiple issues that might work as 'hooks' to interest duty bearers. De Soysa cautions that any engagement strategy by civil society, towards such state stakeholders must be "flexible, adaptable and iterative" (p.4).

Recommendation 9: Where 'duty bearers' holding state power are reluctant to engage, CSOs should carefully identify organisations and individuals (people who could be "champions" regarding the corruption/climate change nexus) and optimal times and issues, as part of a flexible, adaptable and iterative strategy of reaching out.

3.3 Existing frameworks for engagement are an opportunity

Where there is reluctance to start conversations around the corruption/climate change nexus, or it appears to difficult to identify the right opportunity to start a conversation, it may be useful to use UN conventions as the basis for engagement. The widespread acceptance of UN conventions across the ASR, means that laws and policies relating to the corruption/climate change nexus do not need to be designed from scratch. UN instruments already include provisions that can be used by parties as the basis for action against corruption (including transnational crime) and climate change. For the corruption/climate change nexus, key conventions are the UNFCCC, UN Convention Against Corruption (UNCAC) and the UN

Convention Against Transnational Organised Crime (UNCTOC).[41] As mentioned, UNDP's own ACIAC emphasises the implementation of the UNCAC.

These conventions are a useful starting point to promote law and policy reform and for discussions around integrity action, especially peer discussions by state parties where one state can champion the connections between conventions and how they can be used to promote reform. Parliamentarians, including opposition parliamentarians, can play an important role by pointing out their state's commitment to UN conventions and asking questions about implementation, any gaps and existing strengths—all of which assists in creating recognition and momentum for the corruption/climate change nexus.

Recommendation 10: Promote UN conventions and their interrelated connections to the corruption/climate change nexus as the basis for policy and law reform.

- Non-state stakeholders can also promote fulfillment of these conventions as the basis for action and reform.
- Having one or several states as champions for the conventions across the ASR may assist other states to understand how the conventions can be used as the basis for reform.

Many environmental issues stemming from climate change are transboundary in nature. Examples of transboundary issues include management of river water or of dust storms that cross frontiers. Fortunately, there are regional networks focused on both corruption and the environment. Regional organisations of states are better positioned to discuss transboundary corruption and environmental issues due to established diplomatic relations and their membership of regional organisations such as the Arab Anti-Corruption Integrity Network, African Association of Anti-Corruption Authorities, and the Intergovernmental Authority on Development (IGAD; which includes Djibouti, Somalia and Sudan). In the environmental space, there is a Regional Organization for the Conservation of the Environment of the Red Sea and Gulf of Aden (PERSGA) and IGAD has a Centre of Excellence for Climate Adaptation and Environmental Protection. **Annex 2** lists some of these organisations.

Regional organisations could host talks that put corruption on the agenda of transboundary resource management. One challenge is that organisers and participants in state-sponsored talks on transboundary issues may be sensitive to discussions about corruption. First, there is an element of not wanting to 'air one's dirty laundry' in front of other stakeholders. Second, admissions of unmanaged corruption risks highlight weaknesses, something state institutions may be reluctant to do.

Non-state regional networks may also be interested in the corruption/climate change nexus, such as the Arab Region Parliamentarians Against Corruption and the Arab Anti-Corruption Organization. For the environment, examples include the Arab Forum for Environment and Development, the Arab Youth Climate Movement, and the Mediterranean Youth Climate Network. In regard to CSOs, whether focused on integrity or environmental issues, they may be largely unknown and therefore have little credibility in a neighbouring country. National CSOs, or national chapters of international NGOs, may have more policy confidence and knowledge around transboundary issues, but this still does not mean they will be listened to. A regional organisation of states, or a state that is a member of a regional organisation, could potentially

[41] All 22 states in the ARS are parties to the UNFCCC and to the UNCAC, except Syria which has not ratified the UNCAC. All ASR states are parties to the UNCTOC except Bahrain, Comoros, Djibouti, Iraq, Mauritania, Oman, Palestine, and Qatar which have 'accepted' it. Somalia is not a party to UNCTOC.

champion involvement by *non-state* stakeholders in dialogue around resource management, but guarantees would be needed over the protection of representatives when they return home.

Recommendation 11: Identify an Arab state to champion non-state stakeholder participation in regional discussions on the corruption/climate change nexus.

Joint action and communiqués by Arab states that produce few emissions, but which face significant adaptation obstacles, could amplify these voices within the region and beyond. Examples of such states are Comoros, Djibouti, Jordan, Lebanon, Mauritania, Morocco, Palestine, Somalia, and Yemen. They could form a regional subgroup of states with similar vulnerabilities and interests to be a collective voice and advocate at the global level, such as Small Islands States do at the UNFCCC's COPs.

Recommendation 12: Consider formation of a subgroup of Arab states that produce few emissions, are highly vulnerable to climate change and have major adaptation requirements, but need to reduce corruption for adaptation initiatives to succeed.

UNDP's existing networks throughout the ASR, including those established through the ACIAC, are a useful way to identify individuals and organisations who may be willing to engage in discussions and planning focused on the corruption/climate change nexus. For example, its previous trainings and symposiums related to managing corruption risks in the water sector, enhancing institutional transparency, or involving women or youth in managing corruption risks, all lend themselves to this topic.

Other examples of existing networks, are the Arab Anti-Corruption and Integrity Network (ACINET; supported by UNDP/ACIAC) and the African Development Bank High-Level Dialogue on Feeding Africa in 2021 (co-hosted by the AfDB and IFAC), both of which involved states within the ASR and broader MENA region. Stakeholders that participated in the 2021 Feeding Africa dialogue, which focused on corruption and governance in agriculture, will readily understand the link between corruption and climate change given the latter is radically changing agriculture across the region. ACINET already includes the broad range of stakeholders required for action on the corruption/climate change nexus. A series of dialogues on how corruption threatens adaptation initiatives and can cause failure or suboptimal outcomes for climate initiatives could highlight cases of environmental mismanagement and include presentations by climate experts who can explain impacts. Such dialogues could be a good way to promote ongoing engagement with and investment in climate integrity.

Some states have already initiated multistakeholder forums to discuss complex natural resources issues in the context of climate change, forums that could be used to sponsor wider discussions that include corruption. For example, in 2023 Iraq hosted the 'Iraq Climate Conference' in Basra and its third international water conference in Baghdad: 'Water Scarcity, the Mesopotamian Marshes, Shatt al-Arab Environment, Everyone's Responsibility', which discussed growing threats of drought and water scarcity between Iran, Iraq, and Türkiye (Shuker 2024). These initiatives already address climate change issues. The challenge is to have corruption tabled as a contributing factor and then, mostly importantly, what could be done to reduce and manage risks related to corruption.

Finally, state-sponsored environmental initiatives that are already being implemented and that have the potential to showcase positive controls, change and interventions – even if they do not have much involvement by non-state stakeholders – could also be used as case studies to educate other governments

across the region about what could be accomplished. Annex 1 provides two examples of governmental reaction to identified environmental crime and corruption: (1) the Bahraini Government's use of technology to control overfishing, a critical step for the survival of the industry given that Bahraini waters will be severely affected by warming sea temperatures caused by climate change – even more so than other states in the ASR (see A1.6); and (2) the Saudi Arabian ACA's prompt investigation into allegations the CEO of the AlUla UNESCO world heritage historical site engaged in corruption that could have undermined the rehabilitation and management of this delicate desert environment (see A1.7).

Recommendation 13: Map previous and current multinational, multistakeholder, networks, initiatives, trainings, and forums.

- Plan suitable events around the corruption/climate change nexus and invite these individuals and organisations, and/or
- Request special panels/sessions on the corruption/climate change nexus during these forums/initiatives when they next meet.

3.4 Private sector desire for certainty and level playing field

As noted in the Introduction, private investment as a portion of climate finance has now reached 50% of all climate finance funds. I.e., the private sector is not just implementing government- or donor-funded projects, but is risking its own capital unrelated to public flows of CF. This trend towards increased private sector investment will continue, although as cautioned in Section 2 levels of corruption across the ASR may be deterring potential investors from the region.

The quality of climate initiatives involving the private sector that are affected by corruption is nearly always suboptimal. As shown by the case studies, reasons why corruption causes climate and environmental projects to fail or under-perform, include: the best supplier not winning the contract; materials and works being of inferior quality because authorities responsible for monitoring are bribed to ignore substandard infrastructure; and the competitive nature of the public procurement which – is supposed to lead to lower costs and better quality – gets profoundly compromised. Businesses that do *not* engage in corruption are not happy with corrupted procurement processes, because they do not win such projects. *Honest* businesses are allies in anti-corruption efforts.

For cases of corruption involving businesses, see the case studies at Annex 1 on illegal sand-mining in Morrocco (see A1.1), contamination of drinking water in Iraq (see A1.4), and undue influence during COP28 in Dubai (see A1.5). These cases include treatments relevant for the specific example (i.e., less general than the recommendations in this section).

Despite the potential for involvement by business groups in addressing the corruption/climate change nexus, across the ASR and as illustrated in Annex 2, the private sector appears to lack a significant presence in either the anti-corruption or the climate and environmental domains. There are businesses that sponsor environmental work that is largely non-political, such as 'clean up' campaigns or wildlife refuges, and such activity seems particularly prominent in Gulf states. However, obtaining private sector engagement on broader mitigation and adaption policies and programmes will require building trust. Namely that they will not be penalised for expressing their opinions and technical expertise.

Recommendation 14: Consider focusing engagements in politically sensitive contexts on thematic concerns rather than specific cases, states or institutions.

- Focusing on regional, ASR-wide, concerns may be one way to create meaningful engagement and dialogue in political sensitive contexts.
- Thematic discussions may be a first step that leads to more engagement over local concerns once trust has been established.

Engaging with business on creating a level playing field for climate initiatives is essential if the ASR is to attract more CF, as well as for reducing corruption in climate initiatives generally. From an integrity perspective, the private sector has some excellent corruption risk controls, such as the banking industry's controls around money-laundering or private investment firms' controls around due diligence for investment or mergers and acquisitions. Donor-funded climate initiatives would benefit from engaging with the private sector, or representative bodies with extensive private sector membership, to get their advice on adapting these controls for climate initiatives. It should also be politically non-controversial for such private businesses to share their expertise on projects[42].

Recommendation 15: Seek out national networks with extensive private sector membership to commence dialogues around the corruption/climate change nexus and to seek advice on applying private sector expertise around integrity controls to climate initiatives.

- Emphasizing the goal of creating a level playing field for businesses operating in the climate and environmental domains can be a useful 'hook' to generate interest.

3.5 Corruption in procurement – a perennial issue with known controls

Corruption in procurement is a perennial issue that is particularly relevant for climate adaptation initiatives, which frequently involve construction of new infrastructure, such as sea walls or dams. Risks in procurement are well-known, including the fact that the construction sector itself has heightened risks for corruption.

The Libyan case at A1.3 exemplifies where procurement and tendering can go wrong for a publicly funded project implemented by the private sector. Risks around tendering were exacerbated initially by the corrupt nature of the Qaddafi regime and then by the fragile nature of the subsequent post-Qaddafi state, whereby state institutions largely stopped overseeing or monitoring public works in any meaningful way.

In 2023, an extreme weather event—Storm Daniel, a 'medicane'—hit Libya. Such events are increasing in frequency and intensity due to climate change, especially in the Mediterranean. Two dams that had been built to control and hold water along a riverbed that led to the coast through Derna, failed under the pressure of accumulating water. Flood water from the broken dams caused an estimated 20,000 deaths in Derna and displaced 40,000 people whose homes were washed away.

Corruption was a major factor in the failure of the dams. Scholars and media allege that infrastructure contracts under the Qaddafi regime were typically awarded in exchange for kickbacks and that specific

[42] Professional bodies that could be helpful include national chapters of the Association of Certified Fraud Examiners, the Association of Certified Anti-Money Laundering Specialists, and the Institute of Internal Auditors.

funds for the Derna dams were embezzled by government officials. Furthermore, neither the Libyan National Army, which took control of Derna in 2018, nor the Government of National Unity, appointed a new contractor or allocated a budget to maintain the dams. Libya's General Prosecutor launched an investigation into the disaster and initiated criminal proceedings against Derna's mayor and 16 officials from the Water Resources Authority and Dams Management Authority. However, Said (2023) predicts political interference is likely to ensure that while the local officials are prosecuted, high-level national officials who stole funds or failed to allocate resources to fix the problems will not be held accountable

Advice to prevent corruption in procurement and construction is too numerous to mention here, other than to note that multiple resources are available, such as from Transparency International, the U4 Anti-Corruption Research Center, from national anti-corruption agencies, UN agencies, and bilateral donors. Corruption in procurement lends itself to a risk management approach, because the approach can be used for a specific project led by a specific organisation. The recommendation below therefore focuses on lead stakeholders and CF investors doing research to educate themselves about previously identified risks, building their capacity to do an assessment and prioritization of those risks, and then collectively identifying suitable risk treatments.

Recommendation 16: When a climate initiative involves procurement, the lead public agency should invite stakeholders - including private sector providers of services and materials and the national anti-corruption authority – to participate in a corruption risk assessment that produces an action plan for treating risks and who is responsible for implementing these treatments.

- Third-party monitoring of decision-making meetings, such as by probity auditors, could also be useful once projects are actually being implemented.

As the private sector is typically involved in construction of new infrastructure, and frequently in its subsequent operation and management as well, it is imperative that business be involved in any corruption risk assessment. When a public institution invites the private sector to participate in a corruption risk management process, it sends a message that corrupt acts such as bribery, kickbacks and fraud, are already 'on the radar' of the oversight body and other organisations (such as civil society) that may monitor the project – potentially creating a deterrence and increasing the threat of detection. Third-party monitoring of project decision-making meetings, such as by probity auditors, may also be useful to improve transparency.

3.6 An appetite for information in media-restricted countries

Limited transparency around legal findings and processes makes it difficult for the public and stakeholders to properly understand charges, evidence, convictions, and sentences that arise when corruption affects climate or environmental initiatives. Evidence of the specific environmental nature of corrupted natural resource management or climate initiatives may also not have been identified and assessed, partly because institutions were reluctant to publicize these consequences—even though it is likely that such harms are known at the local-level.

Despite limited transparency in the ASR, there is an appetite for information about the corruption/climate change nexus. Unfortunately, and as experienced in the compiling of this report, it can be difficult to find information and evidence about cases.

Recommendation 17: Anti-corruption and environmental bodies consider publishing online as much information as legally possible about cases of corruption in the climate and environmental domains.

Identifying and developing case studies is a strong basis for shared learning between stakeholders, as nothing works better to show the relationship between corruption and environmental harm than a well-developed, real world, case study. Forums focusing on the corruption/climate change nexus could ask representatives to bring cases for sharing and reflection. One case could be about what went wrong, i.e., how outcomes were undermined; damage was worsened; project or programme outcomes were not achieved. A second case could be about successful anti-corruption interventions, i.e., how the wrongdoing was detected; what damage was minimised or avoided due to this detection; what successful investigative or prosecutorial action was taken; what corruption risk management activities were subsequently undertaken; and what challenges were faced in responding to corruption that was detected.

Publicity around successful anti-corruption interventions may also encourage ACAs to get engaged in the corruption/climate change nexus; demonstrate that such engagement can be a positive experience; and educate climate-related stakeholders about the legal processes involved when corruption is detected and reported. Discussions around cases—what has worked; what could have been done better—assists in sharing of perspectives and therefore in building trust.

Another problem caused by lack of publication or discussion of crime or corruption in the environmental sector, is that ACAs may lack experience on environmental crime and be unsure about the application of anti-corruption or anti-fraud laws to such crimes. They may therefore also be unsure of pathways to investigate and prosecute. Similarly, environmental authorities may not understand how anti-corruption laws could be used to help prosecute cases of environmental crime. Case history of successful investigation and prosecution from comparable jurisdictions, and technical advice from legal experts in environmental law (e.g., law professors or even legal CSOs), can build the confidence and knowledge of officials in both ACAs and environmental institutions.

Recommendation 18: Build case study analysis into all corruption and climate change forums.

- Build opportunities for joint learning around case studies at forums on the corruption/climate change nexus.
- Ask participants to bring examples of case studies for discussion, including cases that went well and cases that could have gone better.
- Topics could focus on detecting and reporting wrongdoing in the environmental domain, past cases, challenges of investigation and/or prosecution, remedial action following environmental mismanagement, examples from within the ASR or elsewhere of collaboration between state and non-state stakeholders (both successes and failures).
- Experts invited to present could include, for example, environmental or corruption lawyers, environmental experts discussing cases of mismanagement, or experts from outside the ASR who have experience prosecuting offenders in such cases.

4. List of references

Abderrahmane, A., 2022. Extracting and trafficking Morocco's coastal sand. Research Paper Issue 18. Dakar: Enhancing Africa's response to transnational organised crime (ENACT). March 2022.

———, 2021. Illegal sand extraction threatens Morocco's tourism economy. ISS Today. Dakar: Institute for Security Studies. 27 April 2021.

Afalula, 2023. Activity Report: 2022/2023. French Agency for Alula Development.

Agudo, P.A., 2022. Report of the Special Rapporteur on the human rights to safe drinking water and sanitation. UN Human Rights Council. A/HRC/54/32/ADD.1. 11 July 2023.

Al-Arabiya, 2024. Suspension of the CEO of the Royal Commission for AlUla Governorate on corruption charges. 29 January 2024.

إيقاف الرئيس التنفيذي للهيئة الملكية لمحافظة العلا بتهم فساد. (2024, January 29). Al Arabiya.

Al-Eryani, Y., 2020. Yemen Environment Bulletin: How Weak Urban Planning, Climate Change and War are Magnifying Floods and Natural Disasters. Sana'a Centre, 14 July 2020.

Al-Saidi, M., 2024. Yemen's Water Woes: Why Climate Change is a Drop in the Bucket. Ch. 6 in Troubled Waters in Conflict and a Changing Climate: Transboundary Basins Across the Middle East and North Africa. Marwa Daoudy (ed.), Malcolm H. Kerr Carnegie Middle East Center. 12 February 2024.

Al-Qassim, M., 2023. Environmental Enforcement Technology Adoption: Marine Environment in the Kingdom of Bahrain. Doctoral Thesis, Brunel Business School. London: Brunel University. January 2023.

Almutairi, Y. H., 2016. Protection of the Marine Environment Under International Law and Kuwait Law. Doctoral thesis. Pace University Law School. May 2016. http://digitalcommons.pace.edu/lawdissertations/18/

Alqattan, M.E.A., and Gray, T.S., 2021. Marine Pollution in Kuwait and Its Impacts on Fish-Stock Decline in Kuwaiti Waters: Reviewing the Kuwaiti Government's Policies and Practices. Frontiers in Sustainability, Vol.2, 15 July 2021. https://doi.org/10.3389/frsus.2021.667822

Alqattan, M.E.A., and Gray, T.S., and Stead, S.M., 2020. The Illegal, Unreported and Unregulated Fishing in Kuwait: Problems and Solutions. Marine Policy 116. Art. No. 103774. https://doi.org/10.1016/j.marpol.2019.103775

Almuktar, S., Hamdan, A.H.A., and Scholz, M., 2020, 2020. Assessment of the Effluents of Basra City Main Water Treatment Plants. *Water*. 2020 12(12), 3334. **https://doi.org/10.3390/w12123334**

Aly, B., 2023. Is Derna's Investigation Damned From the Start? In Climate Change, Conflict, and Corruption: Reflecting on Libya's Catastrophic Floods. Malcolm H. Kerr Carnegie Middle East Center. 5 October 2023.

Amnesty International, 2024. Libya: Ensure full investigations into responsibility of powerful military and political actors over catastrophic Derna floods. 11 March 2024.

Anderson, K., 2023. Medicanes: the dangerous storms in the Mediterranean. Greenly. 1 November 2023.

Arabian Business, 2024. Learn about the story of the anti-corruption arrest of the CEO of the Royal Commission in UlUla. 29 January 2024. تعرف على قصة اعتقال مكافحة الفساد للرئيس التنفيذي للهيئة الملكية بالعُلا. (2024, January 29).

Arab News, 2023. Royal Commission for AlUla participates in MENA Climate Week 2023. Arab News. 6 October 2023.

Arab Times, 2017. Qatar accuses Bahrain of abusing a routine fisheries. Kuwait City. 19 September 2017.

Ayoub, J., 2024. The Politics of Environmental Activism: Lebanon's Successful Save Bsiri Valley Campaign. Ch. 2 in Troubled Waters in Conflict and a Changing Climate: Transboundary Basins Across the Middle East and North Africa. Marwa Daoudy (ed.), Malcolm H. Kerr Carnegie Middle East Center. 12 February 2024.

Bahrain Labor Market Regulatory Authority, 2023. Newsletter 2023 Q2.
Bahrain Ministry of Finance and National Economy, 2022. Economic Report. Manama.
Barak, A.M., 2023. National and International criminal protection mechanisms for the environment - an analytical study with application to the State of Palestine. Journal of Legal and Economic Research vol.13: 627-695. [Arabic]
Battesti, V., 2012. The Power of a Disappearance: Water in the Jerid region of Tunisia. Ch. 1.5 in Johnston, B.R., *et al.,* Water, Cultural Diversity an Global Environmental Change: Emerging Trends, Sustainable Futures? UNESCO/Springer. 2012: 77-96.
Battesti, V., and Marty, L., 2023. Bedouins and Sedentaries today in al-'Ulâ (Kingdom of Saudi Arabia): *al-diyâr* and *al-Dîra* in the rear-view mirror. International Journal of Archaeology and Social Sciences in the Arabian Peninsula. 17. https://doi.org/10.4000/cy.10103.
BBC.com, 2023. COP28: Record number of fossil fuel delegates at climate talks, 5 Dec 2023.
Benadad, H., 2020. Trafic de sable marocain vers Melilla: des notables et hommes politiques pointés du doigt. Le360. 10 March 2020.
Bennett, C., 2020. Mafias accused of stealing sand in Morocco. France24.
BNA (Bahrain News Agency), 2024a. Interior Minister affirms royal directives to protect marine wealth. Manama. 15 February 2024.
———, 2024b. *Bahrain bans export of all types of fish, shrimp caught in its territorial waters*. Manama. 31 March 2024.
Buchner B., et al., 2023a. Global Landscape of Climate Finance 2023. Climate Policy Initiative, Nov. 2023.
———, 2023b. Global Landscape of Climate Finance 2023: Methodology. Climate Policy Initiative, November 2023.
Burck, J., Uhlich, T., Bals, C., Höhne, N., Nascrimiento, L., 2023. Climate Change Performance Index 2024. Germanwatch, NewClimate Institute & Climate Action Network.
Carpentier, I., 2022. Working the oasis land. Resource, conflict, and new aspirations in post-2011 Tunisia. Online journal of political geography and geopolitics. 46 (2022-1).
Carpentier, I., and Gana A., 2017. Changing Agricultural Practices in the Oases of Southern Tunisia: Conflict and Competition for Resources in a Post-revolutionary and Globalisation Context. Book chapter in Oases and Globalization. Ruptures and Continuity. Lavie, E., and Marshall, A. (eds), 2017: 153-176. DOI:10.1007/978-3-319-50749-19.
Chen C., Noble I., Hellmann J., Coffee J., Murillo M., and Chawla N., 2023. University of Notre Dame Global Adaptation Initiative: Country Index Technical Report. January 30, 2023. https://gain.nd.edu/our-work/country-index/rankings/
Cislaghi, B. and Heisi, L., 2018. Theory and Practice of Social Norms Interventions: Eight Common Pitfalls', *Globalization and Health* 14(1): 83. https://doi.org/10.1186/s12992-018-0398-x
Climate Central, 2024. Coastal Risk Screening Tool. Accessed 4 Apr 2024.
Climate Watch, 2024. Data Explorer. Accessed 5 March 2024.
Dajani, M., 2024. Water Injustice and Transboundary River Basins: Perspectives From the Occupied Golan Heights. Ch. 5 in Troubled Waters in Conflict and a Changing Climate: Transboundary Basins Across the Middle East and North Africa. Marwa Daoudy (ed.), Malcolm H. Kerr Carnegie Middle East Center. 12 February 2024.
De Soysa, A., 2022. Engaging Reluctant Duty Bearers: Considerations and Strategies for Civil Society Organisations. Berlin: Transparency International, 2022.
El-Anis, I., Poberezhskaya, M., 2023. Responding to Climate Change in Jordan: understanding institutional developments, political restrictions and economic opportunities. British Journal of Middle Eastern Studies. 7 November 2023.
El Nahlawy, H., 2023. Rising to the Challenge: Climate change action in the Arab region. UNDP. 28 September 2023.

El Raey, M., 2006. Air Quality and Atmospheric Pollution in the Arab Region. Draft paper. Beirut: ESCWA/League of Arab States/UNEP, Regional Office for West Asia Report..
FAO, 2018. Fishery and Aquaculture Country Profile: Bahrain. April.
Folke, C. (2003). Freshwater for Resilience: A Shift in Thinking. Philosophical Transactions of the Royal Society of London, Series B, Biological Sciences, 358(1440), 2027–2036.
Fondazione CMCC, 2021. G20 – Climate Risk Atlas. Impacts, policy, economics: Saudi Arabia. Lecce, Italy.
Frank, J., *et al.*, 2023. Strengthening Budget Transparency in the MENA Region. Beirut: UNDP; October 2023.
Gazzini, C., 2023. When the Dams in Libya Burst: A Natural or Preventable Disaster? International Crisis Group. 2 October 2023.
GIZ and République Tunisienne: Ministère de l'Environnement, 2012. Les oasis de Tunisie: à protéger contre la degradation et les effects du changement climatique. 15 Avril 2012.
Hfaiedh, M. A., & Bardi, W., 2021. Does FDI and Corruption affect Environmental Quality in Tunisia? *International Journal of Energy Economics and Policy* 11(4), 267–275. Retrieved from https://www.econjournals.com/index.php/ijeep/article/view/11089
Hattar, K., 2024. CPI 2023 for Middle East & North Africa: Dysfunctional Approach to Fighting Corruption Undermines Progress. Transparency International. 30 January 2024.
Herbersberg, H., 2016. Hot Air in the Orient. Max Planck Research Magazine 4, 2016.
Houdret, A., Pasqua I., and Meknassi, S.F., 2018. Access to Environmental Information: A Driver of Accountable Governance in Morocco and Tunisia? Bonn: German Development Institute. Briefing Paper 11/2018. https://doi.org/10.23661/bp11.2018
Human Rights Watch, 2019. Basra is Thirsty Iraq's Failure to Manage the Water Crisis. Human Rights Watch.
Hunter, Mostafa, 2021. Sectoral Corruption Risk Management: Implementation Guide for the Health Sector. UNDP.
Internal Displacement Monitoring Centre, 2023. Global Report on Internal Displacement: Internal Displacement and Food Security. Norwegian Refugee Council.
International Budget Partnership, 2021. Open Budget Survey.
IQAir, 2023. World Air Quality Report. Los Angeles, USA.
Jamal, U., and Drissi, A., 2023. 'A real hell': The climate refugees of Libya's floods and regional strife. Al Jazeera. 12 November 2023.
Jones, M., 2022. The Desert Does Bloom: Rewilding AlUla. The Standard. 1 July 2022.
Khalfaoui, R., Arminen, H., Doğan, B., and Ghosh, S., 2023. Environment-growth nexus and corruption in the MENA region: Novel evidence based on method of moments quantile estimations. Journal of Environmental Management 342. 15 September 2023.
Kool, D., Birkman, L. and Torossian, B., 2020. Interprovincial Water Challenges in Iraq. Water, Peace and Security Working Paper. 19 August 2020.
Kuzma, S., Saccaccia, L. and Chertock, M., 2023. Water Risk Atlas. World Resources Institute. 2023.
Lackner, H., 2024. Yemen's Vulnerability to Climate Change: How to Strengthen Adaptation. Sana'a Center. 21 February 2024.
Lahn, G. and Shamout, N., 2018. Basra's Poisonous Water Demands International Action. Chatham House Expert Comment, 14 November 2018.
Lahn, G. and Shapland, G., 2022. Cascading Climate Risks and Options for Resilience and Adaptation in the Middle East and North Africa. Chatham House. 29 March 2022.
Lebanese Transparency Association, 2020. Cleaning up corruption along Lebanon's longest river. Blog. 14 April 2020.

Lim, J., Abillama, N., & D'Adamo, C., 2023. Climate resilience is key to energy transitions in the Middle East and North Africa. Paris: IEA.
Livingston, I., 2023. These places baked the most during Earth's hottest month on record. The Washington Post. 2 August 2023.
Mahmoud, M., 2024. Sudan at the Nexus of Transboundary Cooperation on the Nile. Ch. 10 in Troubled Waters in Conflict and a Changing Climate: Transboundary Basins Across the Middle East and North Africa. Marwa Daoudy (ed.), Malcolm H. Kerr Carnegie Middle East Center. 12 February 2024.
———, 2023. Citizen priorities on the environment and climate change in MENA. Washington D.C.: Middle East Institute. 14 February 2023.
———, 2022. Views on the Environment and Climate Change in the Middle East and North Africa. Arab Barometer. October 2022.
Mason, M. 2022. Infrastructure under pressure: Water management and state-making in southern Iraq. *Geoforum* 132 (2022): 52-61.
Morfín, O., 2022. How the MENA region's climate regime influences its water resources. Washington D.C.: Middle East Institute. 20 April 2022.
Morgan, G., 2004. Country Review: Bahrain. FAO. September 2004.
Mungiu-Pippidi, A. *et al.,* 2023. T-Index available at https://corruptionrisk.org, European Research Centre for Anti-Corruption and State-Building.
NAMA, 2022. Perception of Climate Change in Jordan. Amman: NAMA Strategic Intelligence Solutions, 2022.
North Press Agency, 2022. Corruption Consuming Syrian People. 28 December 2022.
Olawuyi, D.S. (ed.), 2023. Climate Change Law and Policy in the Middle East and North Africa Region. New York: Routledge.
Oversight and Anti-Corruption Authority of Saudi Arabia, 2024. Twitter (X) post of 28 January 2024.
Peiffer, C., 2017. Do Anticorruption Messages Work? Emerging Findings and their Relevance for Papua New Guinea. Crawford School Development Policy Centre Policy Brief 17. Canberra: Australian National University. http://devpolicy.org/publications/policy_briefs/PB17anticorruptionPNG-DevpolicyDLP.pdf
Pew Charitable Trusts, 2023. Despite Progress, Illegal Catch Continues to Reach the Market. Brief. Washington D.C. 2 August 2023.
———2019. Study Measures Countries' Exposure to Illegal Catch, Actions to Keep it From Markets. Brief. Washington D.C. July 2019.
Resimić, M. 2024. The Syrian Arab Republic: corruption and anti-corruption. U4 Anti-Corruption Research Center: U4 Helpdesk Answer 2024: 11.
Said, E., 2023. Derna's Tragedy: The Culmination of Years of Conflict in Climate Change, Conflict, and Corruption: Reflecting on Libya's Catastrophic Floods. Malcolm H. Kerr Carnegie Middle East Center. 5 October 2023.
Saudi Press Agency, 2024. The Oversight and Anti-Corruption Authority initiates a criminal case. Riyadh. 21 January 2024. https://www.spa.gov.sa/N2037548
وكالة الأنباء السعودية. (2024, January 21). هيئة الرقابة ومكافحة الفساد تباشر قضيةً جنائية / عام. https://www.spa.gov.sa/N2037548
Saleem, Z.A., and Skelton, M., 2019. Basra's political marketplace: understanding government failure after the protests. Sulaimani: American University of Iraq. IRIS Policy Brief. 19 April 2019.
Sekrafi, H., & Sghaier, A., 2018a. Examining the Relationship Between Corruption, Economic Growth, Environmental Degradation, and Energy Consumption: a Panel Analysis in MENA Region. Journal of the Knowledge Economy 9(3): 963-979, September.

———, 2018b. The effect of corruption on carbon dioxide emissions and energy consumption in Tunisia. PSU Research Review 2(1): 81-95.
Shuker, Z., 2024. The Drying Land: Iraq's Worsening Water Crisis. Ch. 1 in Troubled Waters in Conflict and a Changing Climate: Transboundary Basins Across the Middle East and North Africa. Marwa Daoudy (ed.), Malcolm H. Kerr Carnegie Middle East Center. 12 February 2024.
Siegfried, Kristy, 2023. Climate change and displacement: the myths and the facts. UNHCR, 5 November 2023.
Taylor, D.A., 2024. Sand Mafias. Scientific American Magazine 330(2) (February 2024: 60.
The Daily Tribune, 2024. *Bahrain implements fishing ban from May 1 to protect marine life*. Manama. 30 April 2024.
Tobin, C., Baccar, F., Twyman Mills, J., Ali, W., and Murshed, Z., 2018. Climate Change Adaptation in the Arab States. UNDP. July 2018.
Transparency International, 2024. Corruption Perceptions Index.
UNEP, 2021. Pollution action note – Data you need to know. September 7, 2021.
———, 2019. *Sand and sustainability: Finding new solutions for environmental governance of global sand resources*. https://wedocs.unep.org/20.500.11822/28163.
UNFCCC, 2023. Provision list of registered participants: on-site participants. COP28. 30 Nov 2023.
UNDOC, 2023. Crimes that Affect the Environment and Climate Change. Vienna.
USAID, 2024. Basrah's Road to Clean Water. Washington D.C. Accessed 22 March 2024.
Wabnitz, C.C.C., Lam, V.W.Y., Reygondeau, G., The, L.C..L, Al-Abdulrazzak, D., Khalfallah, M., *et al.*, 2018. Climate change impacts on marine biodiversity, fisheries and society in the Arabian Gulf. PLoS ONE 13(5): e0194537. https://doi.org/10.1371/journal.pone.0194537
Walton, G. and Pieffer, C., 2017. The Impacts of Education and Institutional Trust on Citizens' Willingness to Report Corruption: Lessons from Papua New Guinea. *Australian Journal of Political Science 52(4): 517–36.* https://www.tandfonline.com/doi/abs/10.1080/10361146.2017.1374346
Walton, G. and Pieffer, C., 2015. The Limitations of Education for Addressing Corruption: Lessons from Attitudes Towards Reporting in Papua New Guinea', Crawford School Development Policy Centre Discussion Paper 39, Canberra: Australian National University.
Wehrey, F. *et al.*, 2023. Climate Change and Vulnerability in the Middle East, Malcolm H. Kerr Carnegie Middle East Center. 6 July 2023.
Winbourne, S., 2002. Corruption and the Environment. Washington D.C.: USAID. November 2002.
Wolf, M.J., Emerson, J. W., Esty, D. C., de Sherbinin, A., Wendling, Z. A., et al., 2022. Environmental Performance Index 2022. New Haven, CT: Yale Center for Environmental Law & Policy. epi.yale.edu
World Bank, 2023. Worldwide Governance Indicators: Control of Corruption, 2022.
———, 2014. Turn Down the Heat: Confronting the New Climate Normal, Washington, DC: World Bank.
Yassin, M., 2023. The Space for Iraqi Climate Activism is Dangerously Small, and Shrinking. Washington D.C.: The Century Foundation, 30 August 2023.
Yee, V., 2023. Years of Graft Doomed 2 Dams in Libya, Leaving Thousands in Muddy Graves. New York Times. 27 September 2023.

Annex 1: Case studies

A1.1 Morocco: Illegal sandmining

Alleged/likely behavior - Undeclared COI - Theft of resources - Bribery - Fraud - Abuse of authority **Implicated parties** - Business - Military - Police - Elected politicians - Local government, transport and environment officials. **Sources** Abderrahmane 2022 and 2021; Benadad 2020; Bennett 2020; Taylor 2024; UNEP 2019	In Morocco, illegal mining of beach sand for construction projects is exposing coastlines that are already vulnerable to rising sea levels due to climate change, to even more degradation and erosion. Dredging machines, creation of access roads, and truck traffic degrade and erode beaches and coastal environments, as well as negatively impact the tourist industry (by destroying beaches). Sand extraction has led to the "complete or near disappearance of several beaches, threatening the littoral ecology and jeopardising fisher livelihoods" (Abderrahmane, 2022: 1). By some estimates, the illegal extraction and trade of sand is the third largest transnational crime globally (behind counterfeiting and drug trafficking). The key driver of the illegal trade is the construction industry which requires sand to make concrete.[43] Beach sand illegally mined in Morocco is used domestically and also exported to Spain, Portugal and Cabo Verde. Illegally mined sand is sometimes mixed with *legally* mined sand, making it difficult to trace the true origin and legality of shipments. In 2019, UNEP estimated that 53% of sand mined in Morocco was illegally extracted (2019: 7). Consignments of sand are also fraudulently under-reported and monitored. This facilitates the trade in illegally mined sand, because officials do no physical inspections meaning illegal consignments are never detected or stopped. Academics, journalists, and researchers allege state officials and politicians facilitate illegal sand extraction and trade by protecting miners and transporters and allowing illegal exports. They also allege that politicians and elected representatives have direct ownership of some of the companies involved, with other officials presumably participating in exchange for bribes and kickbacks. Fishers and child labourers are particularly affected by the corruption. Illegal sandmining destroys fish habitat and employs children on very low wages without protections against hazards.
Areas for reform: laws to explicitly ban industrial activities harmful to coastline, including illegal sand mining; licence checks; physical checks of sand consignments; public campaigns to encourage reporting; whistleblower protection; public declarations of assets (business ownership) by politicians, elected members, and senior state officials; investigations when corruption is alleged; and prosecutions when evidence of corruption is found. **Opportunities for leverage:** coordination between tourism industry, fishers, Moroccan scholars, and environmental CSOs (including in destination countries for illegally extracted sand).	

[43] Beach sand grains are angular, making them ideal for concrete and construction, or computer parts and glass. By contrast, desert sand grains are round, making them unsuitable for industrial purposes, such as construction.

A1.2 Tunisia: Inequitable allocation of irrigation water

Alleged/likely behavior - Unmanaged COI - Abuse of authority - Theft of resources - Undue influence **Implicated parties** - Managers of agricultural organisations - Local political authorities **Sources** Agudo 2022; Battesti 2012; Carpentier 2022; Carpentier & Gana 2017.	In Tunisia, the desert oasis of Tozeur and the coastal oasis of Gabès are centres for agriculture, especially for dates but also pomegranates and dairy cattle in Gabès. Due to climate change, temperatures are increasing and there is total reliance on irrigation by groundwater. The latter is becoming scarcer because of over-use, seawater intrusion in Gabès (which will worsen as sea levels rise), and not being replenished by rainfall (which is decreasing). Natural springs from which water used to be drawn in Teozeur, have dried up due to over-extraction from deep wells. In the absence of water allocations, some smallholders drill illicit wells for their private date farms, often on the outskirts of oases where they lack legal title, further depleting aquifers. Allocation and supply of drinking water is also a significant problem in both locations. Protestors allege that authorities ignore large irrigators who illegally extract water, while denying permits for irrigation or drinking water for rural communities. Tension around water allocation is being exacerbated by expanding ecotourism within oases, which requires water for tourists' consumption and recreation (gardens, pools and running streams). In short, due to climate change, over-use, economic diversification, and population growth, there is not enough water to go around. Irrigation water is managed and distributed by *Groupements de développements agricoles* (GDA), which are regulated by the state and managed by local individuals.[44] Small farmers and other citizens have protested that GDAs unfairly over-allocate water to influential landowners, including those with ties to political authorities. Corruption is alleged to be a major factor in the inequitable distribution of remaining water. Lack of transparency over the finances of GDAs, and associated lack of accountability of GDA managers to their members or other authorities, feed perceptions of mismanagement and corruption. Lack of opportunities for CSOs and communities to engage with officials also contribute to perceptions of corruption, as there are few occasions for the public to ask questions or officials to clarify policies or processes. Researchers, the media, some CSOs, and smallholders allege that corruption by those responsible for allocating water, is causing overuse and inequitable access that drives smallholders to dig illicit wells (worsening water shortages). Sharecropper families without legal land title, who work seasonally without social security or regulated conditions, are most affected by corruption as they do not receive allocations of irrigation water controlled by GDAs. (Although some have illicit private wells, they often cannot afford electricity

[44] Historically, water in these oases was managed by influential local families and considered a communal resource to be shared. Under French colonial rule, and then following independence, water management was centralised under state officials who determined extraction quantities, allocations, and pump and channel infrastructure.

	required for pumps). GDAs, which manage water, also have no representatives who are sharecroppers or women, meaning these stakeholders are marginalised from decision-making.
Areas for reform: devolution of resource management to the local level; stakeholder forums to discuss and resolve water-related problems; public declarations of conflicts of interest by GDA managers and local authorities; public campaigns to encourage reporting; whistleblower protection; investigations when corruption is alleged; and prosecutions when corruption is found. **Opportunities for leverage:** coordination between tourism operators, agricultural organisations, local governments, community organisations, and environmental CSOs.	

A1.3 Libya: Floods exacerbated by corruption in construction

Alleged/likely behavior - Embezzlement - Bribery - Political interference - Undue influence **Implicated parties** - Local government - Water Resources Authority - Dams Management Authority - Military authorities - Government of National Unity - Infrastructure firms **Sources** Amnesty International 2024; Basem 2023; Gazzini 2023; Jamal & Drissi 2023; Said 2023; Yee 2023.	In 2023, an extreme weather event—Storm Daniel, a 'medicane'—hit Libya. Such events are increasing in frequency and intensity due to climate change, especially in the Mediterranean. Areas inland from the coastal city of Derna in eastern Libya received extreme rainfall. Two dams that had been built to control and hold water along a riverbed that led to the coast through Derna, collapsed under the pressure of accumulating water. Before the storm, police warned some communities in the most risk-prone areas to evacuate, but few followed this advice because people did not believe or trust authorities. The resulting catastrophic flood swept away buildings and killed an estimated 20,000 people and displaced another 40,000 in Derna alone. Built in the 1970s for irrigation purposes, officials had known since the 1980s that the dam walls had developed cracks and fissures, as evidenced by water leaking dam walls. The Libyan government had developed a remediation plan and contracted a Turkish company to perform the works and build a third dam. The works stopped in 2011, when the Turkish team left amidst the uprising against former President Qaddafi, and the equipment they left behind was stolen. Repairs were never made and the third dam never built. Corruption was a major factor in the failure of the dams. Scholars and media allege that infrastructure contracts under the Qahdafi regime were typically awarded in exchange for kickbacks and that specific funds for the Derna dams were embezzled by government officials. Furthermore, neither the Libyan National Army, which took control of Derna in 2018, nor the Government of National Unity, appointed a new contractor or allocated a budget to maintain the dams. Libya's General Prosecutor launched an investigation into the disaster and initiated criminal proceedings against Derna's mayor and 16 officials from the Water Resources Authority and Dams Management Authority. However, Said (2023) predicts political interference is likely to ensure that while the

	local officials are prosecuted, high-level national officials who stole funds or failed to allocate resources to fix the problems will not be held accountable. The most affected people—those killed or displaced—were in poor neighbourhoods of illegally built homes in low-lying areas along the wadi running through Derna. These neighbourhoods were where many of Derna's migrant workers and its 8,000-strong refugee community lived (mostly from Chad, Egypt, Niger, Nigeria, and Sudan) – people who allegedly missed out on compensation for loss of homes or family members. Women whose husbands died were amongst those most affected, because authorities failed to facilitate provision of death certificates required to receive widows' pensions and other state aid.
Areas for reform: anti-corruption controls around tendering; audits and monitoring of public expenditure; investigations when corruption is alleged; and prosecutions when corruption is found. **Opportunities for leverage:** create multistakeholder groups to prepare for and coordinate emergency responses, and to monitor climate-related infrastructure, including its construction and maintenance.	

A1.4 Iraq: Contamination of drinking water

Alleged/likely behavior - Embezzlement - Theft of resources - Bribery - Fraud - Abuse of authority - Undeclared and unmanaged COI - Undue influence **Implicated parties** - Water authorities - Transport authorities - Customs and immigration officials - Police **Sources** Almuktar, Hamdan & Scholz 2020; Human Rights Watch 2019; Lahn & Shamout 2018; Saleem & Skelton 2019.	In Basra, a city of 1.3 million people in southern Iraq, 60% of drinking water comes from the Shatt Al-Arab River and linked canals. Available water has been reduced by the construction of dams upstream, including beyond Iraq's borders in Iran, Türkiye and Syria, and by generally declining rainfall in catchments due to climate change. Volumes available for drinking are further reduced by unsustainable irrigation and industrial use, with water quality being reduced by sewage, waste dumping, aquatic plants, and ingress of seawater due to lower flows (a problem that will worsen with rising sea levels). Water from the Shatt Al-Arab must be treated to make it potable, but treatment plants were not made to treat water with high salt levels. Much of the remaining demand for water is met by private suppliers of bottled water or through private treatment plants. Donors had provided funds to repair 13 desalination plants to draw and treat water from the Shatt Al-Arab for Basra's water supply system. However, despite the availability of funds to repair treatment plants, in 2018 Basra's drinking water was severely contaminated. 118,000 people were admitted to hospital suffering from rashes, abdominal pain, vomiting, and diarrhea. Corruption was a key factor in the widespread contamination of water supplies. None of the 13 desalination plants were working because none had been repaired: immigration and customs officials had asked for bribes to let construction equipment and foreign experts into Iraq, but the donor refused to pay so vital equipment and expertise were never delivered. Officials then awarded contracts to suppliers who paid them bribes or to which they were affiliated, which meant the best supplier did not necessarily get the tender—and work was never completed.

	Furthermore, local politicians allegedly illegally extract water from the city network for their private businesses (reducing volumes available to the public), but are never investigated or held accountable. The Iraqi Commission of Integrity (its ACA) is investigating some of these allegations. Corruption allegations extend to private suppliers as well. Water carriers who delivered water from private suppliers to households, paid bribes to obtain a licence and to avoid cleaning tanks, which meant water-carrying vehicles did not always meet sanitary standards. The most affected stakeholders are poor people. Approximately 25% of Basra's population lives in informal housing not connected to the formal water and sanitation network. Surveys estimate these families spend around 30% of their income on buying water. However, the poorest of the poor rely on, or illegal tap into, the city's supply—which made them ill in 2018. Some families were also forced to leave: OCHA estimates that 3,780 people in Basra have been displaced due to inadequate access to water (some of whom came to Basra due to having been previously displaced from elsewhere due to drought).
Areas for reform: anti-corruption controls around tendering; audits and monitoring of public expenditure; strengthened regulation of private water businesses; trusted reporting mechanisms; protection for whistleblowers; investigations when corruption is alleged; and prosecutions when corruption is found. **Opportunities for leverage:** private sector outreach; community forums on mechanisms to report corruption; multistakeholder forums on corruption risk management to ensure water quality; capacity building for the Iraqi Commission of Integrity.	

A1.5 Dubai, UAE: Undue influence by fossil fuel companies at COP28

Alleged/likely behavior - Undeclared and unmanaged COI - Undue influence **Implicated parties** - Global fossil fuel corporations - International and national policymakers **Sources** BBC 2023; UNFCCC 2023	At COP28 in Dubai, 2,456 delegates had links to the coal, oil, and gas industries—the most for any COP ever—including delegates from the world's largest polluters, including BP, Chevron, ENI, EDF, ENI, Equinor, ENI, ExxonMobil, Shell, and Total.[45] Many Arab states have interests that overlap with the fossil fuel industry. However, given (1) the vulnerability of Arab states to climate change; (2) that nine Arab states produce minimal emissions (Comoros, Djibouti, Jordan, Lebanon, Mauritania, Morocco, Palestine, Somalia, and Yemen); and (3) the slow pace of climate action across the ASR, it is concerning that the number fossil fuel voices at COP28 nearly matched the total number of Arab voices. The risk for climate action, is that corporations exerting undue influence, will shape policies in a way that slows or stops mitigation programmes. The stakeholders that lose the most from polluters' undue influence on energy policymaking, are states that do not profit from the oil, gas or coal

[45] There was a total of 3655 official delegates from the 22 Arab States (UNFCCC, 2023).

	sectors. Of the nine Arab states in this category, their delegates collectively were outnumbered 1.4 to 1 by fossil fuel delegates. For every Somali delegate (Somalia is the most climate vulnerable and one of the poorest countries on earth), there were 10 fossil fuel delegates; for every Yemeni delegate, there were 27 fossil fuel delegates; and for every Lebanese delegate, there were 77 fossil fuel delegates.
Areas for reform: mandated declarations of corporate affiliations for all delegates attending climate-related policy forums, with delegates' declarations being made public; some decision-making spaces that exclude fossil fuel representatives, to allow for franker discussions and to reduce the risk of undue influence. **Opportunities for leverage:** coalitions between non-fossil fuel states and CSOs to restrict corporate influence on climate policymaking; outreach to non-fossil fuel energy companies (e.g., focused on wind or solar power) to ensure private sector renewable energy voices also get heard by policymakers.	

A1.6 Bahrain: Illegal fishing

Alleged/likely behavior - Illegal fishing practices - Illegal exploitation of natural resources **Implicated parties** - Fishers - Supreme Council of Environment - Directorate of Marine Resources (Fisheries) - Bahrain Coast Guard - Police **Sources** Al-Qassim 2023; BNA 2024a and 2024b; The Daily Tribune, 2024; FAO 2018; Pew Charitable Trusts 2019; Wabnitz *et al*. 2018; Morgan 2004.	Bahrain has the least oil-dependent economy in the Gulf region, with 83% of GDP coming from non-oil sectors. Fishing of shrimp, crab and finfish makes a tiny contribution to national GDP, but it is a significant source of jobs, income and food in 43 coastal villages where it is one of the few available livelihoods. There are approximately 2,500 fishing vessels and the industry employs 11,800 people (approx. 7% of employed Bahraini nationals). All fishing is artisanal. Overfishing and illegal fishing became a problem for Bahrain which, in 2019, was rated having the second worst port in the world for managing risks around Illegal, unreported and unregulated fishing. In March 2024, Bahrain introduced seasonal fishing bans to protect certain species during breeding periods and banned the export of wild-caught fish and shrimp from Bahraini waters to prevent depletion of marine resources and prioritize local consumption. Difficulties managing Bahrain's fisheries are compounded by climate change that is causing warmer sea temperatures that reduce and change habitat for many catch species. In the Gulf, the greatest loss of species caused by climate change is predicted to occur in Bahraini waters, with Bahrain's fishing industry also predicted to be the most negatively impacted given the importance of fishing for livelihoods. Increasing recreational fishing, much of which has been unregulated or illegal, threatens fish stocks in some areas and thus also threatens artisanal commercial fishing. Coastal fisheries are threatened by other developments too, such as land reclamation, waste dumping, and desalination plants. Over the past decade, the Bahrain Coast Guard (BCG) has adopted technology to track fishing activities of all commercial and pleasure boats, in order to enforce fishing regulations, to prevent overfishing and illegal

	fishing, and to better preserve stocks. The technology includes a coastal surveillance radar system, sensors and heat sensors, data management and analysis tools, tracking devices which have been made mandatory on all vessels, a 24/7 call centre, and social media (Instagram and 'X') to disseminate information on laws and regulations. The BCG has also held inspection and awareness campaigns. These technologies have increased the speed of gathering and processing data, the accuracy of monitoring while reducing monitoring costs, and raised awareness about regulatory requirements. Having trusted, real-time, data available reduces opportunities for fraud, makes prosecution easier, and makes resource management more transparent.[46] In 2023, the BCG "dealt with 2,365 maritime violations, including fishing during banned periods and breaches of the rules of small boats. Violators were referred to the Public Prosecution and illegal fishing nets were confiscated" (BNA 2024). In 2024, following reports and investigations by Bahrain's Public Prosecution and its General Directorate of Anti-Corruption and Economic and Electronic Security, several companies and individuals were fined for selling illegally caught fish. Fishers in Bahrain are overwhelmingly from the Indigenous Shia Baharna community, for which fishing is a traditional livelihood. Baharnas are Bahrain's largest ethnic group, around 350,000 strong, but they have lower incomes and fewer opportunities compared to other communities. Baharnas will benefit most from a sustainable artisanal fishery that has well-managed risks for corruption and other illegal practices.
Lessons: the best institutional targets for capacity building measures to improve corruption risk management in the environmental sector may be 'line institutions' (e.g., BCG). These institutions could then work with ACAs if/when corruption is detected, to facilitate investigation and prosecution.	

A1.7 Saudi Arabia: Conflict of interest in ecosystem development project

Alleged/likely behavior -Favouritism/nepotism - Abuse of authority - Money laundering - Undeclared conflict of interest **Implicated parties** - AlUla authority - Private suppliers	AlUla is a UNESCO-registered, historic, desert, city surrounded by an ecosystem degraded by overgrazing, vegetation removal and topsoil erosion—problems worsened by climate change (such as higher temperatures and even lower rainfall). The Royal Commission for AlUla is developing it into a centre for tourism and creative industries, surrounded by a restored sustainable ecosystem that includes 10 million planted trees and reintroduced wildlife. In January 2024, after using data analysis and information gathering tools on procurement and financial data, Saudi Arabia's Oversight and Anti-Corruption Authority arrested the AlUla CEO. He was charged with

[46] These measures have not prevented Bahraini fishers from illegally fishing elsewhere—in 2017, 15 Bahraini vessels were detained in Qatari waters accused of illegal fishing (Arab Times 2017).

- Oversight and Anti-Corruption Authority - Communities. **Sources** Afalula, 2023; Al Arabiya, 2024; Arab News, 2023; Arabian Business, 2024. Battesti, 2023; Oversight and Anti-Corruption Authority of Saudi Arabia, 2024; Saudi Press Agency, 2024; Jones, 2022.	corruption offences whereby he allegedly benefited from contracts awarded by the King Abdullah City for Atomic and Renewable Energy (a public scientific research fund) to a company he founded in 2017. After becoming AlUla CEO, he claimed to have divested his stake in his company, but he allegedly continued to hold an ownership stake and recommended it to various departments of the AlUla Royal Commission without declaring a COI and bypassing standard competitive bidding processes (enabling his company to obtain contracts worth US$347,000). He also allegedly coerced some companies and employees contracted to the AlUla project to undertake work beyond their contractual obligations for his personal gain. Charges focus on abuse of authority and money laundering. Three business partners were also arrested. The awarded contracts were for infrastructure essential to the development and operations of AlUla. Their allocation based on favouritism risked undermining site management and project goals. The impact of awarding contracts based on nepotism or COI, is that the suppliers best able to fulfil tender specifications do not win the contract. Instead, suppliers are appointed who provide suboptimal services or products. If it is widely known or suspected that procurement is determined by favouritism, this erodes public trust in government. The Oversight and Anti-Corruption Authority's decisive action signalled that it has investigative capacity and that it would not tolerate such corrupt practices—both of which are deterrents to anyone else considering future corrupt conduct. Communities in AlUla include sedentarized Bedouins (formerly nomadic pastoralists), the sedentary community (who formerly lived in the ancient walled city of the Al-Ula oasis), and foreign workers. The project is creating sustainable livelihoods that including cropping (especially dates and citrus) and livestock (camels, goats and sheep) for descendants of the ancestral communities. Good integrity controls will better ensure there is transparency and accountability for affected communities around AlUla's management, impacts and outcomes. The AlUla project aims to engage local communities, so the awarding of tenders based on personal interests rather than adhering to a policy of local development meant that local communities risked missing out on contracting opportunities.
Lessons: decisive action taken when possible corruption is detected, builds citizens' confidence in responsible authorities and sends a message that corrupt and criminal behaviour will not be tolerated.	

Annex 2: Illustrative anti-corruption and environmental bodies

Observations about the anti-corruption and environmental bodies illustrated in this annex are as follows:

Anti-corruption networks and organisations

- All Arab states have one or more institutions responsible for investigating alleged corruption.
- Anti-corruption bodies tend not to be stand-alone institutions, and it is not clear that they all have education and prevention responsibilities that lend themselves to stakeholder engagement around environmental or climate issues.
- resources required to be effective.
- Most Arab states have constrained civic space for anti-corruption action, with a limited number of non-state actors (sometimes only 1-2). Exceptions appear to be Palestine, Somalia, and Tunisia.
- There is an absence of corruption-focused non-state bodies in Oman, Saudi Arabia and UAE.
- Most states are members of regional Arab or African anti-corruption networks.

Environmental networks and organisations

- All states have a peak environmental institution, often with another institution (e.g., department or directorate) undertaking regulatory functions and implements programmes.
- There are more environment-focused non-state stakeholders compared to anti-corruption focused stakeholders, with some countries having an abundance of such organisations.
- Youth engagement is the focus of multiple non-state stakeholders.
- Some states with constrained civic space on corruption issues are more open on environmental issues, e.g., Bahrain, Comoros, Egypt, Jordan, Mauritania, Qatar, Saudi Arabia, and UAE.
- Non-state environmental stakeholders remain limited in some states (e.g., 1-2 organisations could be identified), such as Libya and Oman.
- Non-state environmental stakeholders manage to exist and operate in some politically fragile or conflicted states, e.g., Somalia and Yemen.
- Most states are members of regional Arab or African environmental networks.

Non-state organisations vary greatly in terms of their size, resources, scope, and international links. For example, in Egypt the Junior Business Association is a network of young business people—employed by large successful enterprises in major economic centres—focused on integrity and reform in the economic sector, with specialised committees for different economic sectors; in Comoros, Action-Comoros Anjouan is a small NGO that focuses only on environmental concerns on the island of Anjouan; in Jordan 'Transparency International Jordan' is the Jordanian chapter of the global anti-corruption CSO; in Morocco the Alliance for Climate and Sustainable Development is a platform for scores of associations and networks from across the country to exchange information, ideas and to engage with policymakers; and in Yemen the Studies and Economic Media Center is a non-profit think-tank focused on strengthening citizen interest and participation in transparency and policymaking, especially women and youth.

The diversity of non-state organisations is an opportunity and a challenge. Donors should not use a single approach to engagement, because there is too much variety in focus and capability and in relationships with government (ranging from cordial to oppositional). However, this range in focus also means that if donors adapt their programmes they can promote the lessons of organisations that have a narrow focus or broad; that know how to influence policymakers through public criticism or closed-door networking; or that have highly specific and localised knowledge issues (e.g., water management in a single desert agriculture oasis) or general understanding of the broad impacts of climate change on entire populations.

CORRUPTION		ENVIRONMENT	
State	**Non-State**	**State**	**Non-State**
Regional African Association of Anti-Corruption Authorities (Morocco, Algeria, Tunisia, and Egypt are members); Arab Anti-Corruption Integrity Network (Somalia is not a member); Intergovernmental Authority on Development (IGAD; includes Djibouti, Somalia and Sudan)	Arab Region Parliamentarians Against Corruption; Arab Anti-Corruption Organization	Regional Organization for the Conservation of the Environment of the Red Sea and Gulf of Aden (PERSGA); IGAD Centre of Excellence for Climate Adaptation and Environmental Protection (for dialogue in Somalia)	Arab Forum for Environment and Development (members come from all 18 Arab States); Arab Youth Climate Movement; Mediterranean Youth Climate Network;
Algeria National Agency for the Prevention and Combating of Corruption (policy); The High Authority for Transparency, Prevention and Fight against Corruption; Central Office for the Repression of Corruption (part of the national police) – investigating corruption	Association algérienne de lutte contre la corruption;	Ministry of Environment and Renewable Energy	Algerian Environmental and Sustainable Development Association; Youth Association for Environment and Culture; Together for Blue and Green
Bahrain Bahrain Ministry of Interior – General Directorate of Anti-Corruption and Economic and Electronic Security; Anti-Corruption Crime Directorate	Bahrain Transparency Society	Supreme Council of Environment	Animal & Environment Protection Society; Environment Friends Society
Comoros National Commission for Preventing and Fighting Corruption	Maison des organisations de la societé civile	General Directorate of Environment and Forest, Fisheries Resources, and Agriculture and Livestock Strategies	Action-Comoros Anjouan; Ulanga-Ngazidja; Federation of Ulanga Associations of Moheli
Djibouti National Anti-Corruption Commission; State Inspectorate General	Bender Djedid Organization for Socio-economic Development	Ministry of Environment and Sustainable Development (and Directorate of Environment)	Djibouti Nature; Green Direction
Egypt Administrative Control Authority; Ministry of Interior – General Directorate of Public Funds Investigation;	Egyptian Junior Business Association	Egyptian Environmental Affairs Agency	Green is Life; Youth Love Egypt Foundation; Nature Conservation Egypt; Environment Without Borders Foundation

CORRUPTION		ENVIRONMENT	
State	**Non-State**	**State**	**Non-State**
Iraq Federal Commission of Integrity	Al Nahrain Foundation for Transparency and Integrity	Ministry of Environment; Board of Environmental Protection and Improvement (Kurdistan areas)	Nature Iraq; Iraqi Green Climate Organization; Humat Dijlah;
Jordan Jordanian Integrity and Anti-Corruption Commission	Transparency International Jordan; Jordan Transparency Center	Ministry for Environment	Jordanian Environmental Union and Jordanian Federation for Environmental NGOs, both of which have numerous members
Kuwait Kuwait Anti-Corruption Authority (Nazaha)	Kuwait Transparency Society; Kuwait Association for Protecting Public Funds	Environmental Protection Council (laws) Environmental Protection Authority (implements);	Kuwaiti Environmental Protection Society; Green Line Environmental Group;
Lebanon National Anti-Corruption Commission	Gherbal Initiative	Ministry of Environment	Lebanese Environment Forum; Society for the Protection of Nature in Lebanon
Libya National Anti-Corruption Commission	Libyan Transparency Association	Environmental General Authority	Libya Youth Council for Climate Change
Mauritania General Inspectorate of the State; General Inspectorate of Finance; police unit for economic and financial corruption; Specialist Anti-Corruption Court	L'Alliance nationale contre la corruption en Mauritanie (a coalition of religious leaders, lawyers, intellectuals and university professors)	Ministry for Environment and Sustainable Development; Department of Environment Control	Agir en faveur de l'environnement (ONG AFE); Nature Mauritanie; NGO Naforé
Morocco L'Instance nationale de la probité, de la prevention et de la lute contre la corruption (INPPLC); Ombudsman;	Moroccan Network for Defending Public Funds; Transparency Maroc	Ministry of Energy Transition and Sustainable Development; Ministry of Agriculture, Marine Fisheries, Rural Development and Water and Forests;	Moroccan Alliance for Climate and Sustainable Development (platform of associations and networks); Living Planet Morocco; Mohammed VI Foundation for the Protection of the Environment; Moroccan Agency for Sustainable Energy S.A. (state-owned renewable energy company)
Oman State Audit Institution; Office of the Public Prosecutor	Oman chapter of the Association of Certified Fraud Examiners	Ministry of Environment and Climate Affairs; Environment Authority	Environmental Society of Oman;

CORRUPTION		ENVIRONMENT	
State	**Non-State**	**State**	**Non-State**
Palestine Palestinian Anti-Corruption Commission	Transparency Palestine (TI Palestine); MUSAWA: Palestinian Center for the Independence of Judiciary and the Legal Profession; Human Rights and Democracy Media Center Shams	Environment Quality Authority;	Palestinian Environmental NGOs Network—Friends of the Earth Palestine
Qatar Administrative Control and Transparency Authority	Arab Region Parliamentarians Against Corruption	Ministry of Environment and Climate Change	Arab Youth Climate Movement Qatar (also regional); Friends of the Environment Centre
Saudi Arabia Oversight and Anti-Corruption Authority (Nazaha)	Saudi Anti-Fraud Organisation; Saudi chapter of the Association of Certified Fraud Examiners	General Directorate of Environmental Protection; National Center for Environmental Compliance	Saudi Environmental Society; The Prince Sultan Institute for Environmental, Water and Desert Research (Center for Desert Studies); Saudi Gulf Environmental Protection Company (a business);
Somalia Independent Anti-Corruption Commission	Marqaati (NGO); Center for Democracy and Governance (Somaliland NGO); Bareedo Platform Somalia (Puntland NGO)	Ministry of Environment and Climate Change	Somalia Greenpeace Association; Environmental and Rural Development Organization; Somali NGO Consortium
Sudan Ministry of Justice; Empowerment Elimination, Anti-Corruption, and Funds Recovery Committee	Al-Khatim Adlan Center for Enlightenment; Sudan Democracy First Group	Higher Council for Environment and Natural Resources	Sudanese Environment Conservation Society; Sudan Youth Organisation for Climate Change
Syria Ministry of Justice	Syrians for Truth and Justice; Madaniya Initiative (UK registered charity with 150 Syrian CSO members).	Ministry of Water Resources; Ministry of State for Environmental Affairs;	Madaniya (UK registered charity with 150 Syrian CSO members).
Tunisia Bonne Gouvernance et de la Lutte Contre la Corruption (IBOGLUCC)	Institut Arab des Chiefs d'Entreprises; Alliance Tunisienne pour l'Intégrité et la Transparence; Tunisia Association for Financial Transparency;	Agence Nationale de Protection de l'Environnement; Tounes Clean-Up	Association Tunisienne pour la Protection de la Nature et de l'Environnement; Association Tunisienne de Droit de l'Environnement

CORRUPTION		ENVIRONMENT	
State	**Non-State**	**State**	**Non-State**
United Arab Emirates UAE Accountability Authority	UAE chapter of the Association of Certified Fraud Examiners	Ministry of Climate Change and Environment (each emirate its own body with environmental management responsibilities)	Emirates Environmental Group; Emirates Nature-WWF; Emirates Marine Environmental Group
Yemen Supreme National Authority for Combating Corruption; High Authority for Tender Control	Studies and Economic Media Center; Human Rights and Information Training Center	Ministry of Water and Environment; Environmental Protection Agency; Geological Survey Authority	Yemeni Foundation for Agriculture and Sustainable Development; Ibdaa Foundation for Environment and Sustainable Development