EU SEE

SUPPORTING
AN ENABLING ENVIRONMENT
FOR CIVIL SOCIETY

Mongolia

Country Focus Report

2026



Photo credit: Fadhil Abhimantra

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A) An Introduction to the Enabling Environment

What we understand by an Enabling Environment is the combination of laws, rules and social attitudes that support and promote the work of civil society. Within such an environment, civil society can engage in political and public life without fear of reprisals, openly express its views, and actively participate in shaping its context. This includes a supportive legal and regulatory framework for civil society, ensuring access to information and resources that are sustainable and flexible to pursue their goals unhindered, in safe physical and digital spaces. In an enabling environment, the state demonstrates openness and responsiveness in governance, promoting transparency, accountability, and inclusive decision-making. Positive values, norms, attitudes, and practices towards civil society from state and non-state actors further underscore the supportive environment.

To capture the state of the Enabling Environment, we use the following six principles:



In this Country Focus Report, each enabling principle is assessed with a quantitative score and complemented by an analysis and recommendations written by our Network Members. Rather than offering a singular index to rank countries, the report aims to measure the enabling environment for civil society across the six principles, discerning dimensions of strength and those requiring attention.

The findings presented in this report are grounded in the insights and diverse perspectives of civil society actors who came together in a dedicated panel with representatives from civil society to discuss and evaluate the state of the Enabling Environment. Their collective input enriches the report with a grounded, participatory assessment. This primary input is further supported by secondary sources of information, which provide additional context and strengthen the analysis.

Brief Overview of the Country Context

Reported period covered: from **November 2025 to July 2026**

The Mongolian People's Party (MPP)-led government was ousted in June 2025, after a notable protest that led to a vote of no confidence and the resignation of the prime minister. Today, the Mongolian People's Party (MPP) is the ruling political party in Mongolia with 68 seats in the parliament out of 126. Although the government has been controlled by the Mongolian People's Party for the past decade, conflicts between the MPP's internal fractions led to the resignation of multiple MPP governments. The Democratic Party, now in the opposition with 42 seats in the parliament, has announced its intention to oust the current government (made up of a coalition of 3 political parties: Mongolian People's Party, HUN Party and National Coalition of Mongolian Green Party and Mongolian National Democratic Party) which was appointed by the parliament in June 2025.

Mongolian civil society operates in a dynamic political and economic context. Although the 1992 Constitution guarantees fundamental rights and freedoms for all (including freedom of voice, expression, association and assembly, and the press), Mongolia's democracy has been referred to as "flawed" by the V-Dem institute since 2024. Most of the foundational laws necessary to protect and defend civil society have been adopted. Mongolia does not have a list of banned civil society organisations or extremist organisations. However, the implementation of these laws remains weak — as evidenced by the country's rank in 67th position on the Rule of Law Index for 2025: down 20 places since 2015. Civil society's expectations of improvement in the scores remain low in 2026. Despite these challenges, Mongolia remains one of a few — if still flawed — stable democracies in region, exhibiting mid-range performance across International IDEA's Global State of Democracy framework. The number of civil society organisations is growing in Mongolia despite insufficient support from the government.

The government sought to suppress civil society between 2019 and 2022 by revising the Law on Non-Governmental Organisations with two separate laws: the Law on Unions and the Law on Associations which were aimed at increasing state control and reporting of civil society organisations while limiting funding sources. These laws were struck down by parliament during the drafting process due to strong opposition by civil society. Although similar oppression was invisible in the past year, public officials — including the mayor and governor of Ulaanbaatar — organised several counterprotests against civic movements in 2026.

Media freedom is also constrained in Mongolia. Although targeted attacks on reporters have not been recorded, over 70 percent of media are affiliated to or under the control of politically exposed persons. More than half of all defamation cases have been brought against journalists and the media, leading the country to fall to the 102nd place on the World Press Freedom Index. However, in a positive turn, in November 2025 the Constitutional Court of Mongolia annulled the defamation clause from the Criminal Code, leaving open the need to clarify it as a non-criminal violation.

B) Assessment of the Enabling Environment

PRINCIPLE SCORE

1. Respect and Protection of Fundamental Freedoms

Score: (Obstructed) [1]



The Constitution of Mongolia was adopted in 1992, after the democratic transition from a socialist system to a market economy. It recognises and guarantees freedom of association, freedom of assembly, and freedom of expression equally for all citizens.

On paper, all effective laws and regulations developed and adopted are consistent with the Constitution of Mongolia, ensuring rights without any discrimination. The Law on Non-Governmental Organisations regulates relationships pertinent to the foundation, dissolution and operation of foundations and NGOs; the Law on Regulation of Protests and Demonstrations regulates relations pertinent to peaceful demonstrations and protests by civil society and public; the Law on Legal Status of Human Rights Defenders is on protection of human rights defenders; the Law on Public Hearing regulates relations on public consultations; and the Law on Legislations ensures mandatory researches and public consultations during the development of the legislations and policies, administrative decisions, etc. The Government has established a working group on the draft Law on Whistleblowers' Protection and submitted a draft to the parliament for the adoption in the 2026 session.

In practice, the implementation of laws varies, demonstrating negligence mostly from public officials and government offices, and resulting in double standards and failure to uphold these rights and the rule of law.

[1] *This is a rebased score derived from the CIVICUS Monitor rating published in December 2025.*

1.1 Freedom of Association

Mongolian laws recognise and ensure freedom of association. The Constitution of Mongolia ensures and guarantees in its Article 10 the right to form a civil society organisation (CSO) for all citizens based on their social and personal interests, beliefs and views on a not-for-profit basis. Discrimination and persecution of a person for setting up a civil society organisation or joining as a member is prohibited.

While all CSOs must adhere to the Law on Non-Governmental Organisations upon association, sector-specific requirements must be adhered to pursuant to the Law on Legal Status of Professional Unions by professional associations, and the Law on Press Freedom by the media upon foundation.

The government attempted to limit freedom of association by proposing to parliament a revision to the Law on Non-Governmental Organisations in 2021 (revised Law on Non-Governmental Organisations). Although the drafts were suspended, CSOs fear for their safety and security and the state's impartiality.

1.2 Freedom of Assembly

The Law on Procedures for Organising Protests and Demonstrations regulates key relations that are relevant to the freedom of assembly in the country. The objective of the law is defined in its Article 1: to ensure people's fundamental rights to organise peaceful demonstrations, assemblies, and protests, to establish procedures, and to ensure the safety and security of organisers. According to Article 3 of the law, citizens of Mongolia, registered political parties, and CSOs are allowed to organise peaceful demonstrations, assemblies, and protests.

Article 9 of the law says that organisers must inform the governor of the organising district about their planned protest, assembly, or demonstration. The law does not require any confirmation or permission from the said governor. However, during the 2020–2022 "No War", "No Double Standards", and "No Naadam" protests, the police detained organisers and forcibly dispersed protesters. Police invaded protests and arbitrarily detained protesters on the basis that they did not have permission to organise a protest. This phenomenon has since been repeated during many protests organised since COVID-19. Such arbitrary detentions were not recorded during the 2026 protests which were held for 26 days and led to the resignation of the governor of Ulaanbaatar.

This contrast suggests that the authorities' response to assemblies varies in practice. However, the absence of reported arbitrary detentions during the 2026 protests does not, on its own, establish that the earlier practice has ended.

1.3 Freedom of Expression

Freedom of expression is ensured pursuant to Article 16 of the Constitution of Mongolia. Citizens of Mongolia are guaranteed rights to hold beliefs and freely express their views and opinions, and ensures free speech, press, and peaceful assembly.

The main law that regulates press freedom is the Law on Press Freedom, adopted in 1998 and in the process of revision by the parliament. On 24 January 2025, the former government submitted the draft revision to the Law on Press Freedom to parliament. The Media Council of Mongolia, CSOs and members of Parliament have expressed concerns about the draft law, including whether it adequately protects journalists' confidential sources and preserves the broad scope of press freedom under the existing law. The Human Rights Commission called

for stronger source protections and for the law to distinguish deliberate falsehoods from journalists' professional mistakes. The Ministry of Justice and Home Affairs reported that it had held four consultations with affected groups while preparing the draft law. The government and media representatives have not come to an understanding on the draft clauses of the law during discussions on revisions to the Law on Press Freedom, therefore delaying finalising the drafting process.

The police have interrogated citizens and penalised them with fines for posting online memes and posters shaming the President of Mongolia in 2024. The police initiated the investigation without receiving a complaint. No further interrogations related to online memes were identified in 2025 or 2026. However, this does not establish whether the 2024 police action deterred people from posting similar criticism or whether the police ceased pursuing such cases.

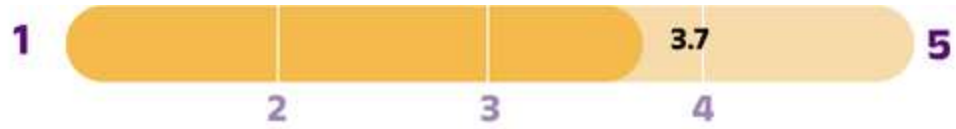
In 2019, the Press Institute of Mongolia reported that more than 70% of major media organisations were owned by senior political figures. This concentration of ownership raises concerns about editorial independence and whether coverage of political issues serves the public interest or the interests of media owners. Reporters Without Borders likewise notes that media owners use outlets to promote political preferences and protect economic interests. Journalists also face legal pressure. According to Reporters Without Borders, more than half of defamation cases in Mongolia are brought against journalists and media outlets, and the resulting financial penalties can encourage self-censorship.

On 24–25 November 2025, the Constitutional Court of Mongolia resolved that Clause 13.14 of the Criminal Code, on "Spreading False Information", was in violation of the Constitution of Mongolia. Parliament accepted this decision in December 2025 and removed the Clause from the Criminal Code. Cases that were previously handled pursuant to the Law on Misdemeanours have become criminal cases pursuant to this clause. The Criminal Code's clause 13.14 stated that "if intentional false information was spread to defame a person's reputation or social standing or the business reputation of a legal entity, a penalty of 450 units to 1,300 units (equal to US$128-US$370) shall be imposed or 240 to 720 hours of public good service or restriction to travel from 1 to 3 months". The Criminal Code was used to intimidate both citizens and the media on their expression of views on social media platforms. Therefore, while annulment of the Criminal Code clause is laudable, an effective method of resolving issues related to defamation remains outstanding.

PRINCIPLE SCORE

2. Supportive Legal and Regulatory Framework

Score:



Civil society organisations can freely register in Mongolia and operate under the terms defined in their Charters. A recent study conducted by civil society organisations on the implementation of the Law on Non-Governmental Organisations for the past 29 years underlined that the law had achieved its defined objectives to promote civic space and civic participation, yet would need to be revised in consideration of changes such as the engagement of people on social platforms having occurred with the advent of digital spaces for civic engagement. In 2026, CSOs agreed to draft a State Policy Document on Civil Society and submit it to the President of Mongolia. Both the parliament's Sub-Committee on Human Rights and studies on the implementation of the Law on NGOs had recommended developing such a policy to promote and protect civic space.

2.1. Registration

Civil society organisations (CSOs), including non-governmental organisations, foundations, associations, and unions are classified as 'legal entities', registered at the state registration authority and operated in accordance with the Law on Non-Governmental Organisations and the Law on State Registration of Legal Entities. The Law on Non-Governmental Organisations was adopted in 1997. Since its adoption it has undergone nine revisions, all of which stemmed from amendments to other laws rather than from any reform of the law itself: thus neglecting the necessity to make substantial changes to the legal framework which would better support the development of civil society organisations or civic space.

The procedures and instructions to register CSOs are available and easy to access. There are no legal restrictions on registration of any civil society organisations in Mongolia, including those working in the field of LGBTQ+ rights, working on politically sensitive topics or on the protection of rights of marginalised groups. In practice, the registration process of CSOs requires many documents, including copies of IDs of Board members. Boards should have no less than five people. Organisations working on sensitive issues, particularly LGBTQ+ rights,

have reported obstacles and delays in registration and recognition. While the registration of a CSO takes about three days after submitting all relevant documents to the state registration office, the registration of CSOs in rural provinces takes longer than registration in the capital city. Registration officials in the countryside mostly undertake multiple tasks or lack experience. Therefore, depending on clerical ability and experience and data sharing with the main platform, such registration takes twice as long. There are several cases of Soum officials (the smallest administrative unit in Mongolia) telling prospective organisations to register in Aimags (Mongolian provinces). While establishing a CSO and getting it registered is not difficult, unnecessary administrative bureaucracies arise during changes of Board members or activities defined in the Charter, leading to more paperwork.

The Government of Mongolia established an E-Business platform in June 2026 for the registration of new legal entities and their beneficial owners, and for issuing verification documents for dissolution, expecting ease of registrations in the countryside. According to the Law on State Registration of Legal Entities, all legal entities, including NGOs, foundations, and labour unions must have registered their beneficial owners at the state registration office by January 2020 as defined in the Procedure on State Registration of Legal Entities, Their Branches and Representative Offices and a Handbook on Beneficial Owners. However, as of the deadline, only around 24,000 non-governmental organisations have filed their beneficial ownership information, and about the same number overlooked the registration requirement, mostly due to a lack of information and because the registration form is the same that is used to register for-profit private sector companies. No sanctions were applied to any CSOs for neglecting to file such information. However, the state registration authority ordered a total of 45,373 legal entities to register their beneficial ownership information with the state registration authority by 1 July 2026. This requirement has been difficult for some NGOs to comply with in practice. The registration process asks legal entities for information about ownership stakes and voting rights, whereas NGOs generally have no shareholders. Although official guidance identifies an NGO's board chair and board members as the relevant people to report, using a common registration form has left some NGOs uncertain about whom to list and how to complete fields designed around company ownership.

Where CSOs are registered within three business days, professional unions were obliged to submit a request to register at the Supreme Court within 30 days of their establishment according to the Law on Legal Status of Professional Unions. However, this clause was annulled with effect from 27 February 2026 pursuant to the decision 02 of the Constitutional Court and the parliament accepted the ruling on 17 April 2026. Moving registration away from the Supreme Court removes a separate procedure for professional associations and may make it easier for them to acquire legal status through the ordinary state registration system. Accordingly, registration of professional unions will now be made at state registration within three business days, the same as any other CSOs.

While there was no record of denial of registration of a CSO by the state registration, the Law on Resolution of Citizen's Requests and Complaints Filed to the Public Office or Public Official clearly ensures an appeal mechanism which can apply in the event that a CSO's registration is denied by the state registration authority. In practice, the state registration does demand some CSOs to comply with laws or correct the information.

2.2. Operational Environment

The Law on NGOs prohibits persons from being discriminated against for their association with CSOs and constraining civic liberties. Other laws ensuring principal rights to people and civil society organisations include the Law on Regulation of Protests and Demonstrations (1994) which regulates civic movements and demonstrations, the Law on Legal Status of

Human Rights Defenders (2021) which protects human rights defenders, the Law on Public Hearing (2015) which defines public consultations on decision-making processes, and the Law on Legislations of 2015 (previously described). The Government is drafting the Law on Whistleblowers' Protection and posted it online for public discussion, which is expected to be discussed by parliament in the 2026 Fall session after a delay of about eight years.

Civil society organisations can work in any field without restriction, and the Mongolian government has not banned any civil society organisations or designated any organisation as 'extremist'. Article 16 of the Constitution of Mongolia guarantees fundamental rights and freedoms, including freedom of voice, expression, association and assembly, and the press. There are no additional requirements for permissions or authorisations for CSOs to conduct their operations. Civil society organisations in Mongolia are generally able to conduct advocacy, research, public education, service delivery, and policy engagement activities. They participate in legislative consultations, engage with public institutions, and contribute to debates on governance, anti-corruption, environmental protection, human rights, and social policy. Formal restrictions on civil society activities are limited, and organisations are generally able to operate openly.

The Law on Non-Governmental Organisations ensures possibilities to self-define their internal governance, purpose and activities in their Charters. All CSOs must have a Board, consisting of five or more odd-numbered members, and only the internal Oversight Committee of a CSO has rights to control and monitor its activities, funding and expenditure. The establishment of an internal Oversight Committee is optional and can be established based on the Board's decision pursuant to Article 10 of the Law on NGOs. All activities must be open and transparent to the public and anyone may receive their activities or financial reports as defined by the Law on NGOs. In addition, according to Article 23 of the Law, CSOs must file their activities report with the state registration authority on or before 15 February each year, the content of which is defined in the Law.

The government does not interfere with the internal governance or oversight of CSOs. According to the effective Law on Non-Governmental Organisations and Law on Income Tax of Legal Entities, CSOs file their tax reports to the relevant taxation authority, financial reports to the Ministry of Finance quarterly (*through one platform where tax reports are filed*) and an activity report to the state registration office once a year.

Although the reporting requirements for CSOs are minimal and not burdensome, less than 2 percent of CSOs comply. However, the state registration office has never conducted an assessment on reports received from CSOs and has not provided any instructions on the content and necessities for filing such reports. Although non-compliance for filing reports must result in penalties as defined in the Clause 11.7 of the Law on Infringement, no CSO has been penalised in the past. These administrative and reporting requirements can be burdensome, particularly for smaller organisations with limited institutional capacity. Regulatory and oversight bodies, including the tax authorities, have been used selectively to pressure, intimidate, or investigate organisations and activists perceived as critical of government policies or powerful interests. While such measures do not typically result in the closure of organisations, they can impose significant financial and administrative costs and contribute to a climate of uncertainty. LGBTQ+ organisations have recently reported targeted harassment and efforts to undermine their legitimacy by receiving four tax inspections simultaneously after certain expressions against the police. These pressures contribute to self-censorship among some civil society actors, who may avoid sensitive issues to reduce the risk of retaliation, reputational attacks, or administrative scrutiny.

Mongolia does not have any regulations for unregistered informal civil society and social movements or coalitions such as the Publish What You Pay, the Human Rights Forum, a coalition of over 50 human rights organisations, or the herders' association. Thus, these CSOs open an account under an individual. Although, the registration of any type of CSO is legally allowed, unregistered CSOs are not regulated nor disallowed in Mongolia but are unrecognised by both the public and the government. Such arrangements are formed voluntarily, either online or in physical form, with or without membership, operate on a non-profit basis, and are not registered as legal entities. Nonetheless, as seen with the major protests and rallies against the government that were organised since COVID-19, the most active and impactful ones such as the 'Easy to Resign' movement (that caused the resignation of a former Prime Minister in June 2025) and 'Save Tuul River' (that caused the resignation of the Mayor and Governor of the Capital city Ulaanbaatar in May 2026) were organised online, using platforms such as Facebook and X (formerly Twitter). Overall, while civil society organisations are able to operate and participate in public life, harassment, selective pressure from state institutions, financial vulnerability, and self-censorship significantly constrain the operational environment. Civil society organisations in Mongolia are generally permitted to seek, receive, and utilise funding from domestic and international sources, and there are no legal restrictions on foreign funding. However, access to resources remains uneven across the sector, as described under principle 3.

Beside laws and policy documents of the country such as the Long-Term National Development Policy Vision-2050, the National Anticorruption Program, and the National Program on Human Rights have sufficiently outlined the importance of cooperation with and support to CSOs, it is becoming more challenging for CSOs to find funding from sources other than the government, shrinking their voice against the government and space for them to remain independent. Many organisations face chronic funding shortages and rely heavily on international donor support. In addition, periodic discussions on reforming NGO legislation have created uncertainty regarding the future regulatory environment for civil society organisations: The Law on Non-Governmental Organisations permits CSOs to collect a membership fee, donations, project funding, income generated from its lawful activities and receive state funds. CSOs continuously lack core and donors funding. What is more, the number of CSOs that are funded or established by the government or its agencies has increased, creating unique challenges in Mongolia that could weaken the independence of the entire sector as CSOs become more dependent on government funding. In the discussion on protection and interference, multi-sourced financial availability and financial stability were the key issues raised by stakeholders. Findings of the studies often highlighted the rise of grassroots organisations funded by either government offices or politically exposed persons such as members of parliament.

At the same time, the number of political party-affiliated and politician-affiliated CSOs has increased, further creating conflicts of interest in the procurement of key contracts from public offices.

2.3. Protection from Interference

The law specifically prohibits state interference in CSOs' activities and mandates the CSOs to be independent from any third party, including the state. CSOs are protected from arbitrary dissolution. According to the Law on Non-Governmental Organisations, CSOs can only be dissolved voluntarily or by a court order. Voluntary dissolution can be made by completing activities defined in their Charter or by Board resolution. A court decision to dissolve the NGO can be made if an NGO or a foundation undertakes activities not defined in its Charter or commits serious violations of laws (i.e. forcefully recruits a member, distributes dividends from its income, issues financial guarantees, pays off a third-party's liability, makes a contribution

to a political party, carries out profit-making activities, or spends less than 50 percent of its income on Charter activities, or repeatedly violates laws). In addition, according to the Law on State Registration of Legal Entities, any legal entity can be dissolved if it has not filed its financial reports for eight consecutive quarters with the tax authority or the Ministry of Finance.

On 28 July 2025, based on resolution A/1345 of the Head of the State Registration Authority, 6,636 CSOs were removed from the state register as their tax reports were not validated by relevant tax authorities and financial reports were not filed with the Ministry of Finance for eight or more consecutive quarters. Although some CSOs claim that such removal from the register is direct government interference in their activities, this process is based on Clause 26.1 of the Law on State Registration of Legal Entities, whereby after the public announcement to remediate their failures these CSOs still remain non-compliant. There have been no politically motivated or unjustified decisions to dissolve any CSO in Mongolia.

While Mongolian civil society organisations are generally able to operate independently and engage in advocacy, protections against harassment and retaliatory pressure remain insufficient. Organisations and activists working on politically sensitive issues, including governance, corruption, human rights, and LGBTQ+ rights, have reported online harassment, smear campaigns, and other forms of intimidation. Concerns also persist regarding the selective use of regulatory and oversight mechanisms, including tax inspections, to pressure critical voices. Although such interference rarely results in the closure of organisations or formal restrictions on their activities, it contributes to a climate of caution and self-censorship. Laws clearly prohibit government agencies from interference in the legal operation and business of legal entities, including CSOs. Agencies conduct three types of inspections only, pursuant to their applicable laws such as a) planned, b) based upon complaints, information and c) based on a request by a law enforcement or other government agency. Formal freedoms therefore exist, but civil society actors are not always adequately protected from undue interference or retaliation.

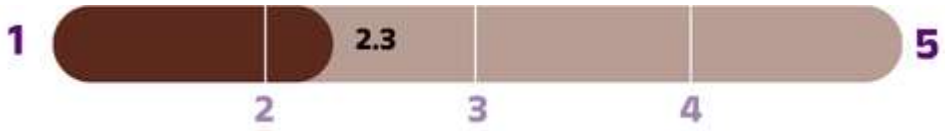
Attempts to shrink the voice of civil society have also extended to the media. In June 2026, Zuv.mn was penalised by police with a fine of MNT20 million. Police fined the media based on a decision of the National Human Rights Committee (NHRC) which arbitrarily resolved that publishing an article using the image of a director of a state-owned enterprise is in violation of the Law on Personal Information Privacy and its clause related to protecting biometric data. The NHRC concluded that the image of a director of a SOE contains biometric data and therefore the media cannot use the image without permission from the person in the photo. Social criticism against this decision of the NHRC raised the attention of senior level officials and the Speaker of the parliament expressed his concern on his social media account expressing his stance in favour of the media and freedom of information. He condemned the NHRC, while publicly ensuring safety for the media. The National Human Rights Committee has fired the employee who made the decision.

To protect civic space and advance the civil society environment, a coalition of over 50 CSOs working in the field of human rights sent an Open Letter to the President of Mongolia, the government and other stakeholders. The letter was developed based on facts and findings of the implementation assessment of the Law on Non-Governmental Organisations over the past 29 years.

PRINCIPLE SCORE

3. Accessible and Sustainable Resources

Score:



CSOs in Mongolia lack core funding and survive based on project funding. Funding from the state for research and analysis has significantly increased in the past years. Such increases and the consistent funding of CSOs by the government impose greater risks to the impartiality of CSOs. Although there are no restrictions on receiving funding information from any sources, CSOs working in rural areas face challenges in participating in tendering processes of foreign donors due to their language barriers and the lack of necessary project-development capabilities.

3.1. Accessibility

The Law on Non-Governmental Organisations permits CSOs to collect membership fees, donations, project funding, income generated from its lawful activities and to receive state funds. The dependence of CSOs on government funding has increased at the same divergence as foreign funding has decreased in Mongolia. The state budget has increased six times over the past decade and government organisations have increased their funding for the procurement, tendering and direct contracting for works, goods and services with CSOs. For CSOs that receive these contracts, government funding may provide an important source of income. However, the selection of contractors by public officials can create incentives to align activities with government priorities and discourage criticism. The extent of CSOs' dependence on such funding cannot be established without data on their overall income and funding sources. The legal environment for NGOs to undertake certain government activities based on contracts exists. However, the selection process, transparency of both activities and income and expenditure and accountability are weak, undermining the overall credibility of NGOs as the outcome of their activities did not show significant benefits to society or to marginalized groups. Furthermore, as the Law on State Procurement states, if the total budget of the contractual work which shall be supplied by the CSO to the government exceeds MNT100 million, the CSO must place an amount into the state account as a guarantee. This

requirement means a burden to not-for-profit organisations, increasing the risk of politically affiliated CSOs entering government services.

CSOs do not raise funds from the public. Domestic philanthropy and individual donations to CSOs are underdeveloped (in comparison to charitable donations to individuals). Public funding opportunities for civil society are selective and not always distributed equally through transparent and competitive mechanisms. Public understanding on charitable work, philanthropy, social impact work, social accountability, donations and pro bono activity is not only weak but also lacks legal definitions.

Local CSOs miss international funding opportunities due to lack of staff to track the advertisement or due to language barriers. A significant number of calls for participation in a project are delivered in English by international organisations. Moreover, international organisations demand strict accounting statements, additional financial documents and audit inspections for funding which often cannot be provided by CSOs operating in local provinces. Access is made even harder by the atomised nature of Mongolian CSOs (i.e. many of them are one-woman or one-man CSOs, not membership-driven larger organisations). This leaves many CSOs playing more of a role of issue-focused consultants that organise groups of organisations for shared opinions, concerns or goals.

On the other side, state support for CSOs is weak and there is almost no concession on taxes. According to the Law on Income Tax of Legal Entities, the state does provide tax exemption to certain activities of CSOs if those are reflected in the Charter (these include the promotion of human rights and people with disabilities). Changes in the Law allowed legal entities to donate a maximum of one percent of their total annual taxable income to social accountability and have it deducted from their income tax. Since 2024, after the adoption of such changes in the Law on Income Tax of Legal Entities, CSO funding has not increased, but companies started to found new CSOs. Mongolia has not established a policy to clearly identify the context and outcome of social accountability. Therefore, companies tend to establish and promote their own CSOs with duties to train staff and conduct research rather than supporting existing CSOs.

3.2. Effectiveness

While many civil society organisations in Mongolia are able to access project-based funding, available resources are often insufficient to support effective long-term programming and institutional development. Funding is heavily concentrated among a limited number of donors and is typically tied to short-term projects with restricted budgets and deliverables. Core institutional support, organisational development funding, and long-term investments in leadership, staff retention, research capacity, and advocacy are limited. Participants in the expert panel convened for this Country Focus Report on 18 June 2026 stated that many CSOs spend a substantial amount of time seeking successive grants, limiting the time available for their core work. A 2021 study by the Civil Society Consortium supports this concern: about four in five surveyed NGOs had no financial reserve to sustain them between projects.

Although civil society organisations continue to achieve important policy and social impacts, resource constraints limit their ability to plan strategically, respond to emerging issues, and sustain effective operations over time. Donor funding usually excludes administrative expenses such as rent, tax, salaries, etc. Thus, with the available funding, CSOs hire young, inexperienced staff and pay low salaries for the period of the project implementation. Donors' requirements for project implementation meet international standards, while a lack of flexibility for rural organisations curbs active participation from grassroots or newly-founded organisations.

Most project timelines are brief but have significant community impact. Due to lack of funding, CSOs' operations are terminated when the project is complete. There is a significant achievement by CSOs working in the field of protecting nomadic culture and herders' rights through the adoption of new methodology on a government concept. According to the revised Law on Environmental Impact Assessment, social impact from mining and infrastructure projects will be assessed to assist the overall livelihood of herders, rural communities, women and vulnerable people. Such milestones are inspiring outcomes in the short term but often cannot build long-term impact.

As a result of the lack of core funding, CSOs apply for projects and assistance in fields outside their area of expertise. CSOs rarely have the opportunity to specialise as they shift their priorities depending on the funding and projects available. CSOs working in the area of monitoring local provincial budgets and expenditure, anticorruption and governance are few. For instance, during the Tuul River infrastructure project hearing in parliament, CSOs specialised in monitoring local budget expenditures were not available according to the Save Tuul River protest organisers.

CSOs lack the ability to plan for the long term and generally seek funding from all stakeholders without considering strategic goals and objectives. Thus, a state policy promoting CSOs and ensuring their effectiveness and stability as well as their specialization is required.

3.3. Sustainability

Although the government does not place any restrictions on how funds and other resources can be used by CSOs, the sustainability of Mongolia's civil society sector remains fragile. Public and private funding are concentrated in a few organisations. Diversified and long-term funding sources are limited; international funding is declining in the long term and unlikely to be replaced by domestic funding sources. Domestic philanthropy and private giving remain underdeveloped, while public funding mechanisms are limited and often inaccessible to independent advocacy organisations. As a result, many organisations face uncertainty regarding staff retention, institutional continuity, and long-term planning. Beyond financial challenges, the sector faces growing concerns about leadership succession and generational renewal. Many established civil society organisations continue to rely on a small cohort of leaders, while relatively few young professionals are entering or remaining in the sector. These trends make it difficult to build resilient institutions and sustain civic leadership over time.

Lack of funding affected many CSOs including the BeautifulHearts's core activities on mental health and recovery which had operated for the past 14 years for victims of human rights, domestic violence and child abuse and which were terminated in April 2026. Due to interruption in funding, an environmental CSO let go all their permanent staff and are operating voluntarily without a project.

Most CSOs do not have permanent staff but hire contract workers, which constantly change. The reason for a lack of permanent staff is related to salary expenses that CSOs cannot afford. CSOs must pay 12.5 percent of total salaries as a social insurance tax to the state in addition to the salary cost of their staff, and donors do not allow administrative expenses to be covered by project funds. What is more, when government agencies announce tenders to procure services from CSOs, the state requires CSOs to have specialised permanent staff in the relevant areas, while this is not the case for private sector companies. Private companies can hire independent experts to participate in government projects, it is not allowed for CSOs. As a result, many CSOs cannot participate in government tenders to provide consulting or other services.

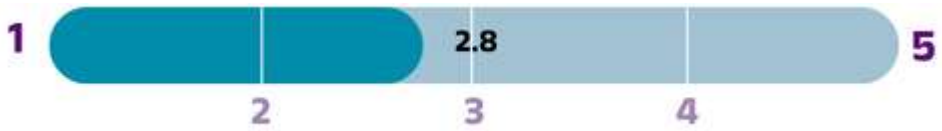
The capacity of CSOs to continue their work remains weak due to unstable salary young staff, unstable salary packages and lack of core funding.

Social impact foundations established by private sector companies such as Khan bank foundation or rural collaborative funds in provinces have been created. These foundations cannot address sustainability issues of civil society organisations related to staff or funding.

PRINCIPLE SCORE

4. Open and Responsive State

Score:



Mongolia has relatively strong legal frameworks requiring public access to government information and public participation in decision-making, including publication of draft laws and consultations with civil society organisations. However, in practice, engagement of CSOs in draft legislative discussions and in working groups has been selective and inefficient and creates only an appearance of consultation.

Mongolia had made several moves to protect the rights to information in 2026 and abolished all clauses from 100 laws that enabled public offices to conceal information from the public and entailed the disclosure of over 894 different information points, including major transaction agreements made by state-owned enterprises.

4.1. Transparency

Mongolia has a relatively strong legal framework for access to information, and government institutions increasingly publish laws, budgets, procurement information, parliamentary proceedings, and other public data online. Mongolia scored 87 out of 150 points on the Global Right to Information Rating based on its Law on Information Transparency and the Right to Information, which lists over 80 types of information that must be accessible to the public and constantly updated. These include the budget, procurement, and legislative and policy drafts that are published proactively online for the purpose of public discussion and suggestions. According to the Law on Public Hearing and the General Administrative Law all administrative decisions need to be reviewed and commented on by the public.

Digitalisation efforts and open government initiatives have improved the availability of government information, and civil society organisations regularly use public information such as opendata.gov.mn, burtgel.gov.mn, opendatalab.mn on legal entities' information, including the shareholding and beneficial ownership and information on licences and participation in

state procurement and tendering, shilendans.gov.mn on budget spending by all public offices, including information on contracts and agreements over MNT5 million, tender.gov.mn on state procurement announcement, selection and related litigations to conduct research, advocacy, and oversight. Also, websites such as parliament.mn gives information on parliament members' attendance, laws, legislative drafts under public discussion and relevant studies and analysis. Despite this legal framework, local organisations identify practical challenges, such as processing delays, requiring further implementation efforts.

However, implementation remains uneven across institutions. Information is often published incomplete, delayed, or in non-user-friendly formats, and proactive disclosure practices vary significantly between agencies. Civil society organisations and journalists continue to face challenges obtaining timely and comprehensive information on government decision-making and public spending. While transparency has improved over the past decade, gaps in implementation, data quality, and responsiveness continue to limit meaningful public oversight. Citizens can request information in paper form or in full, in the event of partial disclosure, and public offices should respond within 30 calendar days with a potential extension of an additional 30 days according to the Law on Resolution of Citizen's Requests and Complaints Filed to the Public Office or Public Official. Although consolidated data on denied information requests are unavailable, participants in the expert panel convened for this Country Focus Report on 18 June 2026 reported cases in which public bodies cited institutional confidentiality to deny access. In the event of failure by a public office to respond to requests, citizens can file complaints with the Administrative Court.

In practice, implementation of transparency laws is irregular, information on government agencies is obsolete, monitoring and oversight is weak, and responses to complaints are inconsistent. Often government agencies' websites do not function due to updating or reconstruction. Rural administrations are deficient in posting all information or being on time, or post in user-unfriendly formats which makes it difficult for civil society and the public to monitor budgets and finance related information efficiently.

Regarding political funding, on the initiative of CSOs, the government of Mongolia initiated UN Resolution 11/7 on preventing and combating corruption through enhancing transparency in the funding of political parties, candidatures for elected public office, and electoral campaigns. This resolution is the first-ever dedicated to Article 7, paragraph 3 of the UNCAC on enhancing political finance transparency. Yet the resolution goes beyond transparency and systematically connects the prevention of corruption in political finance to other relevant convention obligations on prevention, law enforcement, criminalisation, and international cooperation. In May 2026, the government of Mongolia adopted an Action Plan to implement up to December 2027. According to the Action Plan, the General Election Committee is organising an international symposium to launch the new system built to track, monitor, review and disclose political party funding transparency.

Information related to state-owned enterprises' spending and appointments is completely obscure. Most of the corruption-related facts and cases turn out to be related to state-owned enterprises' procurement, consultancies and other agreements. The Law on Public Information Transparency and the Law on Protection of Personal Information were adopted in 2021, and the Law on State and Official Secrecy in 2016. In 2017, the government adopted a resolution pursuant to the Law on State and Official Secrecy, to adopt the list of state secret information. This is a general list. As a result, government organisations started listing some items as 'confidential' that they did not want the public to know. In major corruption cases related to state-owned enterprises, high-level public officials hid agreements behind 'confidentiality' to obscure their wrongdoing. The new government then proposed a revision to

the Law on Sate and Official Secrecy to restrict invoking confidentiality to hide information. The draft was adopted in June 2026 by the parliament. The new law and 99 accompanying regulations are to ensure constitutional principles and eradicate the limiting of the public right to information, and ensure transparency as defined in the Concept Note. According to the Law, the list of secret information shall be adopted by annulling the government resolution of secret information and abolish an 'official secret'. Accordingly, public offices will not be able to conceal information from the public

4.2. Participation

Mongolia's Civil Society Participation Index score is at around 0.575, indicating a moderately enabling but consistently fluctuating environment according to the V-Dem Institute. The Constitution of Mongolia guarantees basic human rights to its citizens to access information, and participate in public life. Mongolia has established a relatively strong legal framework for public participation through the Law on Legislations, the General Administrative Law, the Law on Public Hearings, and other mechanisms adopted since 2015. These laws require public consultation, stakeholder engagement, and opportunities for citizen input in policymaking and administrative decision-making. While public hearings are mandatory for the development of legislations and policies, implementation of CSOs' recommendations remains inconsistent. CSOs have recurrently raised concerns regarding the government's selective approach to engage CSOs and a lack of authentic engagement of public and civil society in policymaking. In the majority of cases, government tends to exclude key CSOs from discussions if they have criticised the government.

According to the Bertelsmann Stiftung's Transformation Index (BTI), the political leadership in Mongolia generally permits and accommodates civil society participation in policy dialogue, with formalised legal mechanisms for public hearings and comment solicitation. But, in general, consultation processes are often conducted as procedural requirements rather than genuine opportunities to influence decisions. Civil society actors report cases where draft decisions were published with inaccurate timestamps, limiting the period available for public comment, while some legislation has been fast-tracked through parliament within days of submission with limited consultation. Participation opportunities therefore exist and are protected by law, but their quality, inclusiveness, and influence on final policy outcomes remain uneven.

Legislations and government administrative decisions that have passed without public knowledge and engagement have significantly increased since COVID-19, with no accountability. During COVID-19, the government adopted two laws on economic recovery during the pandemic which allowed adoption of laws without prior studies or public consultations, in an expedited manner. This process continued even after the annulment of laws on economic recovery. Between 2020 and 2025, out of 254 laws submitted to the parliament, 45 drafts had been adopted in an expedited manner, without public consultation, applicable research and analysis, and with no information provided to the public.

According to the Open Society Forum's legal analysis, the revision to the Law on Minerals was not supported by proper studies. After criticism from CSOs, the Ministry of Industry and Minerals sent back the study and revised the draft law, incorporating only some suggestions from the CSOs. In most cases, CSOs or the public provide comments and suggestions but are ignored by the government. The government has pressured CSOs and the public to provide comments on their draft documents during the discussions on shared drafts on the spot, without giving time to review or study the documents.

4.3. Accountability

Civil society organisations in Mongolia are generally able to participate in legislative consultations and contribute in drafting legislation. The Law on Public Hearing (2015) ensures public consultations on decision-making processes, the General Administrative Law (2015) ensures public discussion on administrative decisions prior to its approval, and the Law on Legislations (2015) ensures mandatory research and deliberative consultations prior to administrative decisions. It is mandatory for CSOs to be part of public consultations, especially for the CSOs working in the sector.

Public and CSO comments and suggestions are taken seriously by the government, listed and responded to. However, instead of meaningfully influencing decision-making, civil society actors are consulted as a formality. Public offices develop a selective list of organisations to participate in public discussions and hearings on draft legislation.

Feedback mechanisms on comments and suggestions provided on the legislative drafts by CSOs and public are ineffective and non-transparent. Some experts said that participation of CSOs in decision-making is hampered by the atomised nature of CSOs, they mostly speak for themselves, and are not organised or larger movements (unions). Atomised CSOs are challenging to include in policymaking beyond the expertise and reputation of specific individuals.

Mongolia has established a range of formal accountability mechanisms, including parliamentary oversight, the National Audit Office, the Independent Authority Against Corruption, administrative courts, and access to information and complaint mechanisms at each government office. Civil society organisations and the media play an active role in exposing corruption, monitoring government performance and budget expenditure, and advocating for greater accountability. However, the effectiveness of these mechanisms remains uneven. Investigations and oversight processes do not always result in meaningful corrective action, sanctions, or institutional reforms, particularly in cases involving politically influential actors. In the past four years, public hearings on Green Bus, coal theft, legitimacy of medications, and Tuul River highway infrastructure development have been organised by the parliament. Thus, although, many illegal activities and grand corruption of public officials have been disclosed during hearings, an accountable person was not found until today. This only created chaos in the society, often triggering demonstrations in front of the government building and reducing trust in the effectiveness of and trust in these mechanisms. Furthermore, a study found that all appointments of senior officials of state-owned enterprises were made through nominations by political party leaders. Changes in senior-level appointees of state-owned enterprises demonstrated a ‘power shift’ from one political leader of ruling parties to another.

While public scrutiny of government decisions is relatively strong, accountability often depends on political circumstances rather than consistent institutional enforcement. The gap between exposing misconduct and securing consequences contributes to public perceptions of impunity and undermines citizens' trust in democratic institutions and the rule of law. As a result, accountability mechanisms exist and are actively utilised, but their ability to ensure consequences for misconduct and improve government responsiveness remains limited.

Although Mongolia is one of the few countries that has adopted a Law on Legal Status of Human Rights Defenders, protection of human rights defenders and whistle-blowers is

inadequate. According to a Human Rights Study by Human Rights Defenders, Lawyers and Reporters, one in five human rights defenders have been arbitrarily investigated in criminal or violation cases, 46.2% said that complaints are not resolved efficiently, and 21.9% had faced penalties for information leaks. An effective protection mechanism depends on the upcoming Law on Protection of Whistleblowers' Rights which is in the process of development by the government.

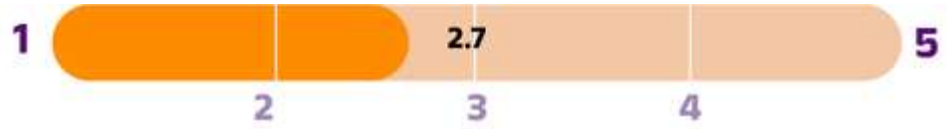
The mechanism to restore infringed rights is weak. In some circumstances, complaints filed to court have been delayed for about six years and a respondent government office has been dissolved. Using the Law on Resolution of Citizen's Requests and Complaints Filed to the Public Office or Public Official to invalidate administrative decisions that are in violation of laws and human rights takes time as the government offices send the complaint to senior officials or a higher administrative authority. In addition, annulling administrative decisions or filing a case with the Constitutional Court are also costly and time-consuming. Due to lack of transparency of all administrative decisions and their process of development from different government offices, it is difficult for CSOs to follow all administrative decisions they seek to invalidate. Although some strong CSO litigations against illegal administrative decisions do exist, the number of CSOs working on monitoring illegal administrative decisions is reducing. Furthermore, civil society actors working on politically sensitive issues frequently face harassment, smear campaigns, and online attacks.

Overall, Mongolia has established the legal and institutional foundations for civil society participation and public accountability. However, selective and often formalistic consultation, weak follow-up on exposed misconduct, inadequate protection of civic actors, and slow or inaccessible remedies limits their effectiveness in practice. Consequently, civil society can scrutinise government action and bring wrongdoing to public attention, but its ability to influence decisions and secure meaningful accountability remains constrained.

PRINCIPLE SCORE

5. Supportive Public Culture and Discourses on Civil Society

Score:



Public attitudes towards civil society in Mongolia are broadly positive and government engagement with CSOs is growing, but unevenly. Organisations working on human rights, anti-corruption and environmental issues are at times portrayed as foreign-influenced or "paid", often through coordinated campaigns on social media. Civic engagement remains active, but LGBTQ+ organisations face discrimination and harassment, rural communities continue to face barriers to participation and CSOs struggle to attract young leaders.

5.1. Public Discourse and Constructive Dialogue on Civil Society

Government institutions and political leaders are gradually showing greater recognition of CSOs' role and a willingness to engage with them, although this progress is uneven, particularly for organisations that criticise government policies. However, organisations engaged in human rights advocacy, anti-corruption work, environmental protection, and criticism of government policies are at times portrayed as foreign influenced, politically motivated, or as obstacles to development and economic growth. Such narratives can undermine public trust in civil society and contribute to hostility toward advocacy organisations. While civil society remains an active and visible participant in public life, public discourse is not always conducive to constructive engagement and can discourage independent voices from participating fully in policy debates.

Public discourse on civil society in Mongolia is mostly positive, with recognition of the important contributions of civil society organisations balanced against scepticism and occasional negative framing, although public framing is more targeted on individuals than on CSOs, an aspect that is shaped by the atomised nature of CSOs or by Russophile or Sinophile actors.

A peaceful demonstration 'Protect the Human Rights Defenders' was organised by the Human Rights Forum - a coalition of over 50 CSOs working in the field of human rights - on Human Rights Day on 9 December 2025. CSOs distributed information to raise awareness of human rights defenders, their contribution and the importance of protecting them, while calling on

Governors of all 21 provinces and 9 districts to support the implementation of the Law on Human Rights Defenders. CSOs have organised 'A Civil Society Day' on 31 January each year since 2008.

Social media is becoming one of the key platforms for CSOs work, public discussions and campaigns. Although traditional media are generally more inclined to present balanced reporting, public discussion on social media can be distorted by coordinated activity that creates artificial impressions of support or opposition. Furthermore, yellow journalism designed for emotional engagement and shock value is also conducted during the public discussion of important legislation or major events such as parliament hearings or during big protests.

Peaceful demonstrations organised by different social groups or movements are regularly organised in front of the government palace on topics such as healthcare reform, social insurance fund transparency, mining activities, government resignation, corruption cases, etc., protected by police. Lack of studies on CSOs' risks and funding, CSOs working on environmental protection, mining accountability and social impact from major infrastructure, and development projects are often criticised as 'paid' without reasonable justification. This discourse is frequently posted on social media but analysis on social media information flow, clickbait dynamics, artificial boosting, account authenticity, and organised engagement are non-existent.

While CSOs have difficulty in raising funds, in March 2026, the mayor and governor of the capital city Ulaanbaatar and two governors of the districts organised and led counter-protests against the Tuul River Infrastructure Development protests. These were funded through the budget of the Mayor and governors' offices and organised to involve public officials in protests against the citizens' protest. Although the capital city governor was removed from office in May 2026, neither the courts nor the authorities responsible for appointing the governors have found that their organisation of the counter-protests involved any wrongdoing.

Some CSOs and activists of local provinces that expressed their positions against certain mining or infrastructure projects' activities or health and environmental issues faced an organised campaign of criticism as being uneducated or paid.

5.2. Perception of Civil Society and Civic Engagement

Public perception about civil society in Mongolia is mostly positive, with recognition of the important contributions of civil society organisations balanced against scepticism and occasional negative framing. In the IAAC's 2025 Integrity Assessment, 8.4% of respondents identified NGOs as institutions where they believed corruption was most widespread. The survey included citizens and business representatives, public officials, and policy participants and experts. NGOs ranked near the bottom of the institutions listed, suggesting that relatively few respondents viewed them as a major locus of corruption.

Electoral participation remains relatively strong, with voter turnout in national elections generally exceeding 65% (73% during the 2024 parliamentary election), demonstrating continued public commitment to democratic processes. Recent V-Dem analysis shows declining perceptions of democratic participation and opportunities over the past five years. Civil society organisations remain active and visible, but advocacy groups working on governance, human rights, and accountability issues often face scepticism regarding their motives, funding sources, and legitimacy, contributing to uneven public trust in civic engagement.

Civic education is rudimentary, other than by CSOs and the General Election Commission. Education and awareness raising were incorporated into the high-school curricula but the content, quality and outreach do not draw the attention of students.

New CSOs are emerging in society who are vocal on political processes, including NGOs on minority rights. Cyber engagement and coordination of citizens have also increased, organising various groups on social activities and political engagement.

Individual charitable donations to support ill persons or disaster management have always been high and highly appreciated. Because politicians publicise and advertise their benevolence, CSOs are suspected of being backed by politicians.

5.3. Civic Equality and Inclusion

The Constitution of Mongolia guarantees its citizens, including marginalised groups, equal rights and opportunities in legal, social, and economic systems, and rights to participate in civic processes. These rights are ensured in all legislation. The Law on Parliament Election has ensured the 30 percent quota for one gender in 2024 elections, aimed at increasing to 40 percent by 2030. But Mongolia is unique in having a reverse gender gap in education as well as in service sectors, and growing awareness of inclusion, though limited to particular issues and population groups.

Mongolia has made progress in expanding participation by women, persons with disabilities, and other historically underrepresented groups, and Constitutional and legal protections are ensured for equality and non-discrimination. Civil society inclusion scores are boosted by strong representation and activism among women's groups, which have historically been at the forefront of democratic reforms and voter education.

However, significant barriers to inclusive civic participation remain in one group in particular. Organisations representing LGBTQ+ communities continue to face discrimination, harassment, and challenges in securing recognition and public acceptance, often facing social bullying and harassment. Participation opportunities are often concentrated in urban areas, while rural communities face greater obstacles to engagement in social life. From time to time, matters related to the Kazakh minority are raised on social media, dividing opinion and polarising views, but generally these topics are used as a cover up for some disclosed facts or information.

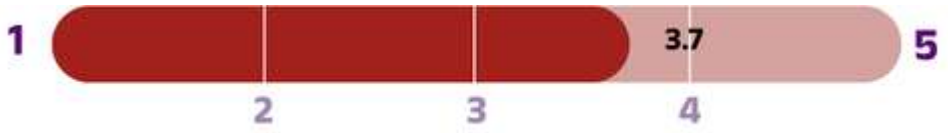
In the mid-term Review Report on Implementation of the Third Cycle of the Universal Periodic Review recommendations, 16 countries have provided recommendations related to inclusion of people with disabilities in social life, their protection and economic possibilities. Due to inadequate training and capacity building programmes for police, doctors, teachers, social workers and other practitioners working in the field of combatting domestic violence, lack of consolidated curricula and content, and inconsistency of training on domestic violence, insufficient response by practitioners to cases of domestic violence have negative consequences. Particularly, understanding and awareness about special care and protection designed for people with disabilities, special needs and LGBT remain inadequate.

Youth participation in civil society and civic leadership is also a growing concern, with many organisations reporting difficulties attracting and retaining the next generation of civic leaders. As a result, while civic participation is formally open to all, access to influence and representation remains uneven across different groups and communities.

PRINCIPLE SCORE

6. Access to a Secure Digital Environment

Score:



In general, people use the internet widely, both in the capital city and the rural areas, and use social platforms' communication tools such as Facebook and Facebook Messenger widely for connection, advertisement, coordination and public discussions. IT expertise is inadequate in the civil society sector due to lack of funding to hire specialised personnel. Laws ensuring cyber security and safety have been adopted, considering aspects of both the user and operator.

CSOs have raised concerns about the use of public funds to develop government digital systems without sufficient consultation or assessment of their effects on users. One example is the Hotula app, developed under a contract commissioned by the Capital City Governor's Office. On 16 April 2026, the National Human Rights Commission reported that the app's collection and use of personal data, including facial recognition data, did not meet legal requirements. It called on the capital city governor to stop using the app until the violations were remedied. The case illustrates why consultation, transparent spending and privacy safeguards matter when public authorities commission digital tools.

6.1. Digital Rights and Freedoms

Since joining the United Nations, Mongolia has strongly supported the principles of the Universal Declaration of Human Rights and ratified the International Covenant on Civil and Political Rights (ICCPR) in 1974. The Constitution of Mongolia strongly ensures rights to its citizens to express their voices while ensuring the rights to restrict it only if it is defined in the law and in the cases defined in the Constitution for the purpose of (1) protecting national security, (2) protecting and respecting one's rights and liberty, and (3) ensuring public orders. While doing so, the government ensures both online and physical expression and voice complies with all protocols and treaties to which Mongolia is a party.

In general, Mongolia maintains an open internet environment, and digital platforms remain important spaces for civic engagement, political discussion, and public oversight. Internet services are provided by private sector companies. Mongolia ranks 42nd globally and 2nd in Asia for internet freedom, with a score of 74 out of 100 in the 2026 Internet Freedom Index.

There were no cases where CSOs' or general public internet access was shut down by the government or a private sector service provider, and the government does not censor CSOs' information online.

However, concerns regarding digital rights and freedom of expression have increased in recent years. Government initiatives to introduce legislation that could expand content moderation requirements and enable greater control over online content have raised concerns among civil society and media organisations. A Law on Human Rights Protection in Cyber Environment was adopted in 2023 in an expedited manner to censor political content on the internet and social media, including filtering websites, deleting posts, and conducting surveillance on political activities. The Law was later vetoed by the President of Mongolia after a weighty condemnation by citizens.

In January 2023, Parliament passed the Law on the Protection of Human Rights on Social Media, which would have established a system for identifying and responding to prohibited online content. Parliament later accepted the President's veto, and the law was invalidated. During the 2024 parliamentary election, the National Human Rights Commission called on authorities to protect freedom of expression while addressing harmful and false content online. Separately, citizens were questioned and fined in 2024 for posting memes and posters criticising the President. No further cases of this kind were identified after mid-2025. The available information does not establish whether this reflects a change in enforcement or whether earlier questioning discouraged people from posting similar criticism. Together, the proposed law and the reported questioning show that online expression has faced pressure, even though the available evidence does not establish whether that pressure has since eased.

Since the arrest of the content-site 'Noorog' in 2025 for making a documentary about the 2024 parliamentary election, incidents of CSO activists, journalists, or individuals facing illegal detention or persecution for their online activities have not happened. According to the study by independent researchers on information manipulation in Mongolia, politicians and political actors increasingly rely on coordinated networks of online accounts and trolls to shape narratives, harass critics, and polarise public debate, particularly on Facebook, Mongolia's dominant social media platform. Civil society and independent media have responded through fact-checking and cooperation. The Facts First Mongolia network, established by the Nest Center, brought NGOs, media outlets and fact-checkers together to address election misinformation; the Mongolian Fact-Checking Center also launched a Facebook Messenger fact-checking service ahead of the 2024 parliamentary election. While digital freedoms remain substantially protected, growing censorship pressures, online manipulation, and harassment contribute to a chilling effect on free expression and democratic participation online.

There were no cases of mass restriction of internet access; however, cases of limited restriction were reported during the peaceful protest during the pandemic. Although CSOs raised concerns on some clauses of the Cybersecurity Law (2021), mass arrests or detention of members of the public or CSOs did not take place in Mongolia. People in general exercise freedom in cyber space. Repeated proposals of ill-defined limits on information in the law and identification of disinformation are yet to happen, as Mongolia seems to be following the poor example of Russian-influenced vagueness in approaches to (dis)information.

Facebook chat box usage by government organisations has been reduced significantly but private companies use it extensively, leaving open the safety and security questions of personal information. The proliferation of online disinformation increased during the 2024 election and 65.8 percent of total complaints of crimes during the election period were in relation to fake news. The number of troll accounts increased on both Facebook, Instagram

and X platforms during the election campaign period, posing a risk to freedom of expression, stifling dissent, affecting civic participation and creating a hostile environment for civil society organisations. However, after the election, from late 2024 to early 2026, over 90 percent of reactions were generated from troll accounts under Vietnamese or Pakistan names during some politicians' public announcements and interviews.

6.2. Digital Security and Privacy

There is no evidence that government agencies or other relevant actors (e.g., private companies, non-state groups) carried out cyberattacks, used spyware, malware, or other hacking tools to infiltrate civil society actors' devices, networks, or online communication platforms (e.g., email, messaging apps, etc.).

The Law on Personal Information Protection was adopted in 2021, ensuring safety and security of information obtained by public organisations from individuals. The Cybersecurity Law, which was adopted in 2021, ensures safety, security and protection of the information in cyber space while on the other hand ensuring accessibility to information, but the implementation of both laws is weak.

Even though CSOs have never been attacked specifically, the government and private sectors have been attacked several times. Key government data servers such as HUR, DAN or the Central Bank and the Government have been attacked in the past two years. Government and social information is usually distributed faster through online platforms (Facebook mainly) rather than government websites. A member of parliament is developing a Law on Cyber Resilience which is aimed at creating a system of protection from cyber-attacks and protect special infrastructures from a potential attack.

On average, over 70 thousand cyber-attacks are registered annually, and almost 65 percent through malware. While the National Computer Security Incident Response Team (NCSIRT) of Mongolia was established in 2022 aimed at detecting, preventing, and responding to cyber-attacks and incidents directed at the information systems, MNCERT/CC is a cyber security national coordination centre established to protect the digital infrastructure in Mongolia and coordinate the prevention, detection and retaliation activities against cyber-attacks and incidents — including against Mongolian CSOs.

However, CSOs as well as the public lack the information, awareness and knowledge to dive into cyber space. Therefore, government platforms do not necessarily suggest cookie options. As a result, individuals' information can be used for any purposes. Moreover, government builds new systems such as a public safety camera system or road administration system that use biometric information. The public is unaware of details such as who uses the personal information and how they will be accountable. The introduction of such procedures to the public by government offices has never happened in the past. There is no study or analysis on personal information use by public and private sector organisations. Unlike CSOs working in the field of human rights or democracy, some CSOs affiliated with private sector companies work on digital education and awareness raising. Although some CSOs work on protection of individual information and on increasing access to information, no CSOs are working in the area of cyber security or protection due to unavailability of funds and lack of capable staff.

6.3. Digital Accessibility

Digital access is important for CSOs' ability to share information and reach people across Mongolia. In October 2025, an estimated 2.93 million people used the internet, equivalent to 83% of the population. Mongolia ranked 81st of 127 economies in the 2025 Network

Readiness Index, which assesses how economies use digital technology across technology, people, governance and impact. Access remains uneven in remote areas where mobile signals can be weak, limiting the ability of CSOs to reach some nomadic and herding communities. Social media nevertheless offers CSOs a substantial means of reaching the public: in October 2025, Meta estimated its potential Facebook advertising reach in Mongolia at 2.7 million people, equivalent to 76.5% of the population.

High levels of mobile phone usage, widespread internet connectivity, and growing availability of online public services have enabled citizens and civil society organisations to access information, communicate, and participate in public life through digital platforms. However, disparities remain between urban and rural areas.

CSOs possess a moderate digital education. Government platforms such as DAN, HUR, shilendans.gov.mn for glass accounts, e-mongolia, opendata.gov.mn, tender.gov.mn and e-business are increasing and rapidly advanced, but the digital divide remains wide in rural areas compared to cities. Marginalised groups such as herders and nomads have been left out of the digital transformation due to lack of connections. Older persons, people with disabilities, and low-income populations encounter barriers to full digital participation.

CSOs have free and easy access to file digital complaints against public offices, officials or corruption through the D-Parliament platform (a platform for public discussions, comments and suggestions into the draft legislations). However, state and private sector as well as CSOs' programmes on digital awareness raising, training and education are almost non-existent, making it difficult for elders, herders, and isolated individuals in rural areas.

Most of the government information such as budget-related documents or agreements are not user-friendly, creating difficulty for researchers to analyze in a prompt manner.

C) Recommendations

Recommendations to the government

- Develop and adopt a Civil Society Policy Document that defines the consolidated long-term development concept with the engagement of stakeholders to address the issues of CSOs, such as weak, unclear, and incoherent regulations, and address the needs and social development stages of CSOs. Furthermore, the policy document must ensure measures to diversify funding sources to regulate an appropriate ratio of international and government funding, as the increase in government funding for CSOs seriously affects their independence and the impartiality of their voice and activities.
- Adopt the revised Law on Non-Governmental Organisations based on the implementation assessment of this law conducted by CSOs by making conceptual amendments and revisions considering current social and economic changes as well as the engagement environment. Furthermore, different definitions in laws need to be aligned, and weak and symbolic regulations on collaborations with CSOs need to be strengthened.
- Ensure the impartiality of the state in procurement, tendering, and contracting with CSOs and conduct transparent due diligence and assessment to constrain the involvement and influence of politically exposed persons.
- Create a CSO consolidated platform where CSOs can post and disclose financial, activity, and other reports that are open to the government and the public to ensure the implementation of the law, given CSOs' lack of financial and human resource capacity to create a website. The requirement to use the platform can be modified in the future.
- Revise the draft Law on Press Freedom on the basis of a thorough study and meaningful consultation with media organisations and other stakeholders, incorporating their input on journalists' source protection and other outstanding concerns before its adoption.
- Develop an effective civil defamation method to address issues related to defamation following the Constitutional Court case based on an efficient study to improve the situation related to the investigation of reporters and to limit the abuse directed at journalists.
- Raise the awareness of law enforcement officials on civil rights and respect for lawful assembly.
- Adopt the proposed amendments to state secrecy laws, ensuring the amendments eliminate the practice of classifying information as secret to avoid releasing it to the public, and narrow secrecy exceptions so that they are in line with international standards.
- Clarify legal requirements around membership of professional unions so that this is not a prerequisite for engaging in government consultations or for being awarded government service contracts.

- Provide guidance on what income-generating activities are allowed for non-profits under existing law.
- Assess the Civil Code and define the not-for-profit sector.

Recommendations to civil society actors

- Civil society actors need to develop and propose to the government necessary terms and definitions applicable to CSOs' establishment, operation, activities and dissolution during the process of a revision of the Law on Non-Governmental Organisations by the government.
- Ensure the Civil Society Policy Document is adopted by the government or adopt the document through a general forum of CSOs without delay and announce this to stakeholders.
- Strengthen the internal supervision council's activities, governance, ethics, transparency, and accountability mechanisms and increase the reporting in compliance with applicable laws.
- Train and develop staff, particularly on data analysis, data protection, IT, and cybersecurity in connection with human rights.

Recommendations to the international community

- Increase multi-year, core funding for CSOs, prioritising specialised and consistent knowledge and capacity building in each area, including IT, digital safety and security, personal information, disclosure and transparency of personal information, compliance, strategic advocacy, and data analysis.
- Support CSOs' initiatives under due diligence, verifying the involvement of politically exposed persons and beneficiaries and reviewing the efficiency of the work conducted and their ability to coordinate well with stakeholders.
- Adapt grant opportunities for CSOs of varying sizes and capacities, with tailored reporting expectations that match the capacities of each CSO and that provide support for reporting and compliance issues for grassroots and rural CSOs.
- Support legal reforms in Mongolia, propped up by efficient studies and development of competent curricula for a systematic awareness-raising programme for law enforcement officials.

D) Research Process

Each principle encompasses various dimensions which are assessed and aggregated to provide quantitative scores per principle. These scores reflect the degree to which the environment within the country enables or disables the work of civil society. Scores are on a five-category scale defined as: fully disabling (1), disabling (2), partially enabling (3), enabling (4), and fully enabling (5). To complement the scores, this report provides a narrative analysis of the enabling or disabling environment for civil society, identifying strengths and weaknesses as well as offering recommendations. The process of drafting the analysis is led by Network Members; the consortium provides quality control and editorial oversight before publication.

For Principle 1 - which evaluates respect for and protection of freedom of association and peaceful assembly - the score integrates data from the CIVICUS Monitor. However, for Principles 2–6, the availability of yearly updated external quantitative indicators for the 86 countries part of the EUSEE programme are either limited or non-existent. To address this, Network Members convene a panel of representatives of civil society and experts once a year. This panel uses a set of guiding questions to assess the status of each principle and its dimensions within the country. **The panel for this report was convened in June 2026.** The discussions are supported by secondary sources, such as V-Dem, the Bertelsmann Stiftung Governance Index, the RTI Rating from the Centre for Law and Democracy, and other trusted resources. These sources provide benchmarks for measuring similar dimensions and are complemented by primary data collection and other secondary sources of information available for the country. Guided by these deliberations, the panel assigns scores for each dimension, which the Network Members submit to the Consortium, accompanied by detailed justifications that reflect the country's specific context. To determine a single score per principle, the scores assigned to each dimension are aggregated using a weighted average, reflecting the relative importance of each dimension within the principle. This approach balances diverse perspectives while maintaining a structured and objective evaluation framework.

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