

MAPPING OF DISINFORMATION LANDSCAPE IN MONGOLIA

Study report



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Abbreviations

CRC	Communications Regulatory Commission
CSO	Civil Society Organization
COVID-19	Coronavirus Disease 2019
EU	European Union
FCM	Fact Check Mongolia
GIC	Globe International Center
GoM	Government of Mongolia
GGGI	Global Green Growth Institute
HPV	Human Papillomavirus
INCITEGov	International Center for Innovation, Transformation and Excellence in Governance
IRIM	Independent Research Institute of Mongolia
IRI	International Republican Institute
KIIs	Key Informant Interviews
MCIR	Media Council for Investigative Reporting
MCM	Media council of Mongolia
MIL	Media and Information Literacy
MFCC	Mongolian Fact-Checking Center
NEST	Center for Journalism Innovation and Development (NGO)
NHRCM	National Human Rights Commission of Mongolia
NGO	Non-Governmental Organization
NISS	National Institute for Security Studies
NSO	National Statistical Office of Mongolia
OECD	Organization for Economic Co-operation and Development
PIM	Press Institute of Mongolia
PR	Public Relations
RSF	Reporters Without Borders
TED	Team Europe Democracy
V-Dem	Varieties of Democracy Institute
WEF	World Economic Forum
X (Twitter)	X (formerly Twitter)
USD	United States Dollar

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Executive Summary

The **Action for Integrity and Democracy Against Disinformation** project is a joint initiative led by the Independent Research Institute of Mongolia (IRIM) in partnership with INCITEGov in the Philippines. Funded by the EU Team Europe Democracy (TED), this project aims to explore effective actions to combat the spread of disinformation and strengthen democratic values through evidence-based, community-centered approaches. This rapid mapping study (July–November 2025) served as the project's first stage. The mapping report intends to build a comprehensive picture of Mongolia's disinformation landscape, identifying how disinformation is produced, spread, and addressed in Mongolia, what impacts it has on both individuals and society, and where critical gaps remain.

Findings of the study suggest that disinformation in Mongolia – especially in cases of consistent and intensive narratives or defined by strong interest – is driven by a **network of actors** rather than isolated individuals. Key originators and sponsors include **government agencies and state institutions, as well as domestic politicians and political parties** seeking to shape public opinion or smear opponents. Foreign actors – notably Mongolia's neighbors **Russia and China** – were also highlighted as external sources injecting disinformation into the Mongolian information space. In addition, various intermediaries facilitate and spread false or misleading content: **professional PR and media teams** that craft disinformation campaigns, partisan or financially influenced **media outlets, social media influencers, and troll networks** that amplify narratives online. Even **ordinary citizens** play a role as amplifiers by unwittingly sharing sensational but false stories.

The primary theater for disinformation is **social media, especially Facebook** as the most widely used social media platform in Mongolia. Organized networks of fake accounts and coordinated groups amplify false stories on a massive scale, exploiting viral algorithms and paid "boosts" to ensure sensational falsehoods reach wide audiences rapidly. Meanwhile, many traditional media outlets – often beholden to political or business interests – echo or even assist in spreading misleading content, whether through biased reporting or opaque content-sharing deals that undermine independent journalism.

Disinformation in Mongolia most commonly targets **three thematic areas: health (especially anti-vaccine narratives), socio-political events, and financial or scam-related content**. False narratives tend to spike during major events such as elections or health programs, taking advantage of heightened public attention. The most frequently used formats include **false narratives, fabricated documents, and cheepfakes** while deepfakes are still rare but emerging. Political disinformation in Mongolia commonly takes the form of defamatory claims, unverified allegations, and conspiracy-driven narratives that seek to undermine trust in institutions. These messages often use misleading data, emotionally charged language, and fabricated or decontextualized visuals to influence public perception. Recent narratives around the 2025 uranium deal illustrate this pattern, blending fear-based storytelling with nationalistic and anti-foreign sentiment.

Disinformation has a serious and growing **impact on both society and individual well-being**. At a societal level, the proliferation of false information steadily erodes **public trust in key institutions like the media and government**. As people face an overload of conflicting and misleading claims, they become more skeptical of all information sources, leading to confusion and a decline in confidence in

democratic processes. This erosion of trust is one of the most severe outcomes, contributing to greater **political polarization and social division**. Moreover, attempts to counteract disinformation, if poorly designed, can inadvertently infringe on **freedom of expression and press freedom**, creating new challenges for human rights. Together, these dynamics threaten democratic stability and the public's faith in the system.

On an individual level, disinformation inflicts **psychological and emotional strain**. Mongolians frequently exposed to fabricated stories report higher stress, anxiety, and frustration, and they can develop **cognitive biases** that skew their understanding of events. False narratives play on emotions, amplifying fear or anger and making people more emotionally volatile and instigate social instability. Certain segments of the population are especially vulnerable. Those with limited media or digital literacy—such as some **younger and older citizens**, along with people **in rural areas or with lower education and income levels**, are disproportionately susceptible to believing and circulating false information. These individual-level effects not only harm personal well-being but also feed back into societal challenges, as misled individuals can further propagate disinformation and deepen collective mistrust.

Government and other actors in Mongolia are implementing a range of countermeasures to address the growing threat of disinformation. However, the government's response remains limited and fragmented, **focusing mainly on legal measures** such as Article 13.14 of the Criminal Code (2020) that criminalizes “obviously false information”. This provision is actively enforced (over 500 complaints annually, but only a few prosecutions), yet it faces strong criticism. Its **broad and vague definition** can over-criminalize speech and chill journalism, eroding press freedom. Authorities also collaborate with social media platforms to remove harmful content, and in 2024 launched a digital literacy framework to help citizens spot false information. However, **no comprehensive anti-disinformation policy exists**, and a 2023 attempt to tighten social media controls was vetoed after public outcry over censorship.

Civil society and media organizations are key to building resilience. **Two independent fact-checking centers—MFCC and Fact Check Mongolia**—have operated since 2020. MFCC has reviewed over 2,000 pieces of content and in 2024 launched “Asuu,” a Facebook Messenger tipline to verify rumors. NGOs lead media literacy campaigns, integrating the topic into schools and public workshops. Media development groups strengthen independent journalism: they train reporters, provide legal aid, promote ethical standards through self-regulation, and advocate for press freedom. The Nest Center's “Facts First Mongolia” coalition, launched in 2024, unites media outlets and NGOs to counter election misinformation.

Despite these efforts, **several systemic gaps and challenges** hinder Mongolia's response. Rapid digital connectivity and high social media use mean false information can spread faster and farther than defenses can keep up. New technology is lowering the barrier for creating sophisticated fake content, outpacing current monitoring and fact-checking capacities. **The media sector's vulnerabilities compound the problem**: with hundreds of outlets in a small market, many rely on political patronage or sensational “clickbait” to survive. This undermines journalistic standards and allows disinformation to fill gaps left by weakened reporting. Declining **media independence** – exacerbated by the use of defamation and “false news” laws against reporters – has fostered self-censorship, limiting exposure of disinformation networks. Meanwhile, the government's countermeasures have been **fragmented and**

reactive. Regulations and content takedowns tend to address individual posts or offenders rather than the coordinated campaigns and actors behind them. Enforcement can be inconsistent or politicized. Finally, **low digital literacy among the public** leaves many people ill-equipped to verify information or resist manipulation. Without major investments in media literacy and critical thinking, technical and legal fixes will have limited impact.

Introduction

The Independent Research Institute of Mongolia (IRIM), in partnership with the International Center for Innovation, Transformation and Excellence in Governance (INCITEGov) in the Philippines, is implementing the project *“Strengthening Democracy and Justice through Countering Disinformation”* from June 2025 to June 2026. Funded by the European Union’s Team Europe Democracy (TED) Initiative, the project aims to strengthen democratic values by enhancing community-level capacities to counter disinformation in Mongolia and the Philippines through an evidence-based and community-centered approach. The project is structured around four main phases:

- (1) conducting a disinformation landscape mapping study in each country;
- (2) implementing a community-level study on citizens’ information practices and exposure to disinformation;
- (3) piloting intervention models targeting groups most vulnerable to disinformation; and
- (4) sharing project experiences and lessons learned with other countries in the region.

Within this framework, the first phase of the project, the Mapping of Disinformation Landscape in Mongolia was carried out between July and November 2025. The study aimed to comprehensively map the national disinformation context, with particular attention to key actors, methods, dissemination channels, dominant narratives, and existing policy and regulatory responses. In addition, the study sought to identify the impacts of disinformation at both individual and societal levels in a rapid yet systematic manner.

To achieve these objectives, the study team employed desk review, key informant interviews, and analysis of secondary data sources, triangulating available information to ensure analytical robustness. Stakeholders involved in the study included policymakers, media organizations, fact-checking initiatives, civil society organizations, and researchers.

Several important analytical considerations should be highlighted regarding the scope of this study.

First, as the overarching objective of the project is to protect and strengthen democratic resilience against the harmful effects of disinformation, the study focuses specifically on disinformation narratives related to democracy and democratic processes. These include narratives concerning elections, political institutions, political parties and candidates, civic participation, human rights, governance, and public trust. Accordingly, disinformation related to health, fraud and scam schemes, or personal-level defamation targeting ordinary individuals was not examined in depth. While such forms of disinformation can have significant social and economic consequences, they involve distinct actors, interests, and organizational dynamics and therefore fall outside the analytical scope of this study. Their exclusion reflects a deliberate methodological choice to maintain focus on the project’s core objective of strengthening democratic values and institutions.

Second, although “disinformation” is the primary focus of the study, the study team recognizes that it constitutes only one of several tools used to manipulate the information environment and shape public opinion. Other forms of information manipulation such as coordinated misinformation, selective or misleading framing, harassment and intimidation of critical voices, inauthentic online activity (including bots, fake accounts, and coordinated networks), and the strategic use of media outlets with opaque ownership or funding structures, often coexist with disinformation campaigns. Therefore, in mapping the disinformation landscape, the study also sought to consider these broader patterns of information

manipulation and their intersections with disinformation narratives, in order to better understand how public discourse and democratic debate are distorted.

Finally, this mapping study should be understood as a foundational exercise. While it provides a structured overview of the disinformation landscape in Mongolia, it does not claim to capture all dynamics or dimensions of disinformation in the country. Rather, the findings and conclusions are intended to serve as a starting point for further research, policy development, and programmatic interventions, including more in-depth thematic or sector-specific studies in the future.

Methodology

Goal, objectives

This mapping aims to capture a comprehensive snapshot of the disinformation landscape in Mongolia, including its key dimensions, and to develop recommendations for improving existing regulations while safeguarding media freedom and freedom of expression.

The mapping aimed to capture a comprehensive snapshot of the disinformation landscape in Mongolia. Specifically, it sought to:

- Identify dominant disinformation narratives, channels, and actors;
- Assess social and individual level impacts, including on public trust, social cohesion, and democratic processes;
- Examine existing countermeasures, including legal, media, and community-based responses; and
- Highlight gaps, risks, and emerging challenges to inform future interventions.

Scope of the Mapping

The mapping was designed as a rapid assessment to provide a current overview rather than an exhaustive or complete analysis. It covered key dimensions of disinformation at national level, emphasizing disinformation related to democracy, governance, and freedoms.

Analytical framework

The project's conceptual framework is designed to guide the analysis of the disinformation landscape in Mongolia. It connects the core research questions with specific thematic elements to be examined throughout the study. By linking each research question to key analytical elements, this framework ensures a systematic and coherent assessment of disinformation dynamics, societal impacts, existing countermeasures, and areas requiring further action. Table 1 below presents the key elements under each research question and specifies what the study seek to identify within each element.

Table 1. Conceptual framework of the mapping

Research Questions	Key Elements	What to Identify
RQ1: How is disinformation produced and spread within society?	Narratives and themes	<ul style="list-style-type: none">• Dominant disinformation narratives, key topics, recurring themes, and their underlying messages
	Dissemination tactics and platforms	<ul style="list-style-type: none">• Main methods and strategies used to spread disinformation• Where it spreads: online/offline channels, traditional media, digital platforms• How disinformation spreads across platforms or communities
	Key actors and their motivations	<ul style="list-style-type: none">• Who is behind disinformation (main actors or groups)• Who is disseminating disinformation (e.g., troll farms, state actors, influencers)• Their roles, interests, targets, and objectives
	Temporal and contextual factors	<ul style="list-style-type: none">• How disinformation activities are linked to specific factors, such as timelines, political cycles, social movements, or major events, including geopolitical factors
RQ2: What are the impacts of disinformation on society?	Affected groups, and their vulnerabilities	<ul style="list-style-type: none">• Groups or communities most affected by disinformation• Their specific vulnerabilities (social, economic, cultural, or technological)
	Impact	<ul style="list-style-type: none">• The effects on community, such as impacts on opinion, voting, or individual behavior

		<ul style="list-style-type: none"> • The effects on social cohesion, public trust, democratic processes • Threats and challenges to democracy
RQ3: What measures currently exist to address disinformation?	Legal & Policy Environment	<ul style="list-style-type: none"> • Existing laws, regulations, and policies related to disinformation • Their scope, effectiveness, and any unintended consequences
	Initiatives and interventions by different actors	<ul style="list-style-type: none"> • Media and information literacy initiatives • Community-led interventions and grassroots initiatives • Roles of civil society, media, and governments
RQ4: What are the key gaps, risks, and emerging challenges in addressing disinformation?	Gaps in policy, practice, and community reach	<ul style="list-style-type: none"> • Key limitations in current policies, strategies, or interventions, especially in terms of reaching vulnerable communities or addressing root causes
	Risks and Emerging disinformation tactics or technologies	<ul style="list-style-type: none"> • New and evolving risks, such as emerging technologies or tactics used to spread disinformation, and potential unintended consequences of current responses
	Needs for new or adapted interventions	<ul style="list-style-type: none"> • Opportunities and priorities for new, improved, or adapted interventions to strengthen resilience and address identified gaps and challenges

Data collection methods

A mixed-methods design was employed, combining desk review and qualitative field inquiry. The following data-collection methods were used:

Table 2. Data collection methods of mapping

Method	Purpose	Sources/Respondents
Desk research	To establish a foundational understanding of disinformation ecosystems, policy responses, and actors.	Reviewed academic literature, fact-checking databases, government regulations, media reports, and previous research projects.
Key Informant Interviews (KIIs)	To obtain in-depth perspectives from practitioners and experts directly engaged in media, policy, and community-level responses to disinformation.	Journalists, editors, policymakers, regulators, CSO representatives, academic researchers, fact-checkers, and digital-rights advocates.
Quantitative analysis of fact-checks conducted	To validate and enforce findings from desk review and KIIs the team has collected and analysed information of disinformation identified by fact checking centres.	Results and contents of fact-checks 1,618 disinformations cases published by the Mongolian Fact Checking Center and Factcheck Mongolia.
Validation Workshop	To establish a foundational understanding of disinformation ecosystems, policy responses, and actors.	Reviewed academic literature, fact-checking databases, government regulations, media reports, and previous research projects.

Totally, 15 KIIs were conducted in Mongolia, depending on the availability and relevance of respondents. Interviews were semi-structured and conducted either in person or online, recorded with consent, and summarized for thematic analysis.

1. Disinformation Landscape Overview

The concept of *disinformation* is not entirely new, but it gained significant momentum and scholarly attention following the 2016 U.S. presidential election and the Brexit referendum (Broda & Strömbäck, 2024). Compared to earlier periods, the past decade has seen rapid advances in digital and social media, leading to a more decentralized information network. As a result, the speed, reach, and audience scale of disinformation have increased dramatically, making its spread more complex than ever before (Kapantai, Christopoulou, Berberidis, & Peristeras, 2021). Interview participants of the mapping study support the argument that the recent technological disruptions affected the increased reach and volume of disinformation in Mongolia – an ever present issue (Interview #1, 5, 6, 7, 11, 14). According to the V-Dem report (2025), the level of disinformation in Mongolia has increased significantly—by roughly twofold—over the ten-year period from 2014 to 2024. Representatives of the two fact-checking centers operating in Mongolia, who participated in the interviews, noted that before the COVID-19 pandemic, coordinated disinformation campaigns typically appeared only during major events. However, disinformation has now become more constant, spreading continuously even during ordinary periods.

This poses a major threat to democracy and its institutions worldwide, contributing to both domestic political instability and international conflicts (Schünemann, 2022). Reflecting this concern, the 2024 Global Risks Report ranked disinformation as the top short-term risk and the fifth most significant long-term risk (WEF, 2024). In Mongolia, spread of disinformation is also perceived to be a major threat, with 85.8% of respondents in the recent IRI National Poll (2024) considering it a problem.

While research on disinformation has expanded considerably across the world (Sadler, 2025), but studies in Mongolia remain limited (OptimalNMax, 2024). The existing research in Mongolia tends to focus narrowly—on specific topics/narratives (NEST, 2025), particular media channels (D. & B., Улс төрийн мэдээлэл харилцаанд инстаграмыг ашиглаж буй туршлага, шаардлага [Practices and Requirements for Using Instagram in Political Communication], 2023; Ya. & D., 2019), or specific techniques and methods (Bayar, 2024). A comprehensive, systematic study examining what types of disinformation exist in Mongolia, who produces them, and how they are disseminated, is yet to be conducted. Therefore, this section of the report draws on expert interviews and secondary data to describe the current state of disinformation in Mongolia to inform this gap.

For this purpose, the study applies the ABC Framework developed by François (2020) to explain and analyze disinformation. This framework divides disinformation into three key components, defined as follows:

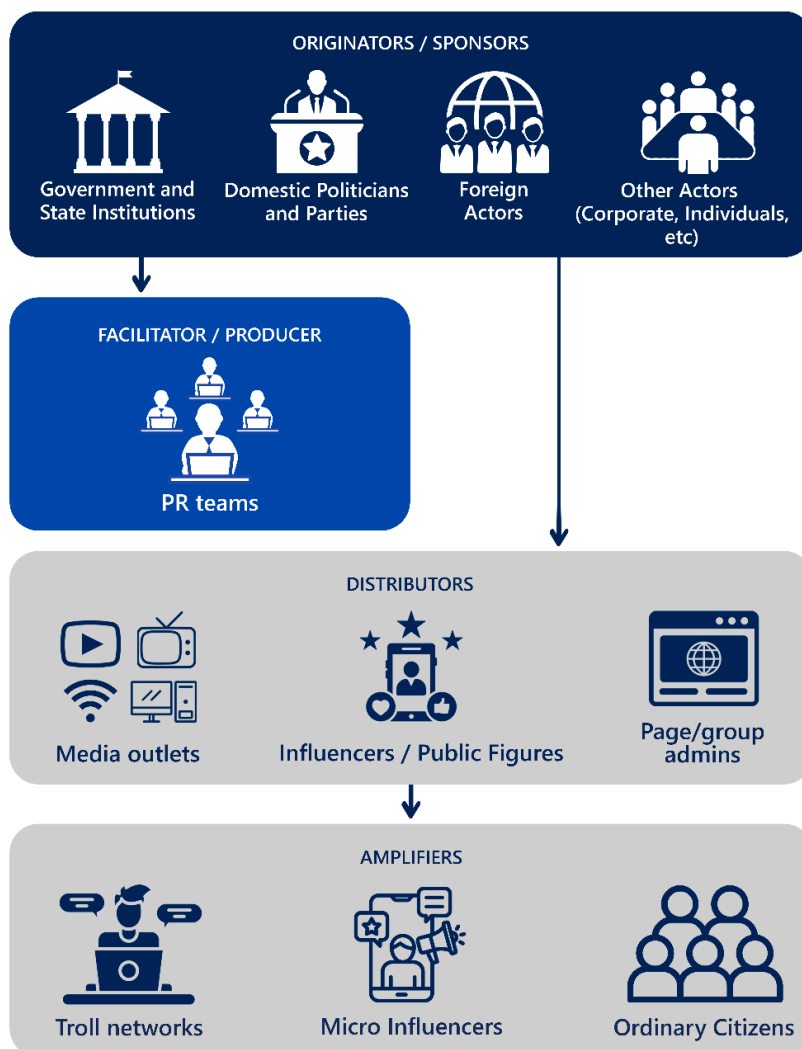
- **Actors** – the individuals or groups who knowingly participate in the creation or dissemination of disinformation for specific purposes;
- **Behaviors** – the methods, techniques, and tactics these actors use to spread disinformation;
- **Content** – the information itself, which negatively affects individuals, organizations, or public discourse.

1.1. Disinformation Actors

Persistent and wide-reaching disinformation narratives are rarely created or spread by a single person or entity; rather, it involves a range of actors who participate in different ways (Hameleers, 2023). Interviews conducted for this study reveal that in Mongolia, various groups—from government institutions to ordinary citizens—are engaged in the production, dissemination, and amplification of

disinformation. These actors can generally be categorized as follows: **originator/sponsors** (government/state institutions, domestic politicians and parties, foreign actors, and others), **facilitator/producer** (PR and media teams), **distributors** (media outlets, influencers, and page/group admins), and **amplifiers** (troll networks, micro-influencers, and ordinary citizens).

Figure 1. Disinformation actors in Mongolia



Source: Authors

This section provides an overview of these actors' interests, their motives and objectives for spreading disinformation, as well as their typical patterns of activity.

1.1.1. Government and State Institutions

The government and state institutions and officials are identified by the interview participants as key actors within Mongolia's disinformation landscape, often functioning as both originators and distributors of misleading information (Interviews #2, 3, 4, 5, 7, 9, 14). Although there is no evidence that the state institutions systematically disseminate disinformation, participants in the study reported that during certain social and political events, depending on the situation, they originate and spread disinformation (Interview #2, 3, 4, 5, 7, 9, 14). From a motivational standpoint, **first, disinformation is frequently used as a tool to enhance institutional and individual reputation, generate public support, and legitimize policies and decisions.** Such practices typically involve the dissemination of biased or

misleading narratives (Interviews #5, #7, #14). A notable example occurred in 2023, when former Prime Minister L. Oyun-Erdene announced that Mongolia had repaid its “Samurai bond” debt of 30 billion yen (approximately USD 200 million), declaring that “Mongolia has finally broken free from a 12-year debt chain.” However, the Mongolian Fact-Checking Center (MFCC) later verified this claim and found it to be misleading. In reality, as of the third quarter of 2023, Mongolia’s total external debt stood at USD 33.9 billion, which was around USD 20 billion higher than in 2011 (MFCC, 2023).

Secondly, interviewees noted that government agencies occasionally release false or premature information, such as claiming a decision has already been made, in order to gauge public reaction before taking official action (Interviews #2, 3, 4, 5, 9). For example, participants observed that authorities sometimes spread information on social media about planned road closures. If the public reacts negatively, officials then deny having made any such decision and instead blame the media for spreading “false news.” This practice undermines public trust in the media and can have harmful consequences for civic discourse.

Thirdly, during major political or policy events, the government and local authorities may intentionally circulate disinformation or engage in political manipulation to divert public attention from sensitive issues (Interview #5, 6). According to the participants, when significant issues such as the approval of the state budget or cases involving corruption and conflicts of interest arise, reports of shocking crimes and tragic incidents suddenly increase and are widely covered across all media outlets. Interestingly, it was noted that during these periods, government institutions tend to provide unusually transparent information about such crimes and incidents, whereas at other times they remain relatively closed (Interview #5). This cannot necessarily be classified as disinformation; however, it suggests a deliberate attempt to manipulate public attention and control the media agenda.

Additionally, experts in the media sector criticized that the Government of Mongolia and various state institutions operate separate public relations units which, instead of ensuring transparency and disseminating information, have increasingly focused on protecting the reputation of leadership and restricting the work of journalists (Eguur.mn, 2025). Interview participants noted that this negatively affects press freedom and journalistic independence, creating a risk that institutional press offices may shift from providing factual information to functioning as propaganda structures (Interview #5).

Taken together, these examples suggest that the government and ruling authorities in Mongolia create and disseminate disinformation to influence and steer public opinion, divert attention, bolster political support, and protect their power and legitimacy. Interview participants emphasized that state-driven disinformation carries serious long-term consequences, notably the erosion of governance quality and the decline of public trust in institutions.

1.1.2. Domestic politicians and political parties

When asked to identify the main producers and distributors of disinformation in Mongolia, interview participants most frequently named politicians and political forces, suggesting that these actors are the principal “manufacturers” and “sponsors” of disinformation. According to their observations, **disinformation intensifies during elections and major political events—primarily to smear opponents and to boost public support** (Interviews #3, 4, 5, 6, 7, 8, 10, 11, 14, 15). Media monitoring during the 2020 and 2021 elections reported similar patterns (IRI & Press Institute Of Mongolia, 2021).

The interview findings also indicate that **politicians may leverage an ecosystem of disinformation that brings together PR teams, media outlets, well-known influencers, and troll networks.** While there isn’t

sufficient data to prove this network directly, the expert interviews, observations from practitioners and politicians, and secondary sources together allow us to sketch a credible picture. The following sections discuss these actors in more detail.

1.1.3. Foreign actors

Interview participants (Interview #4, 5, 6, 9) emphasized that foreign countries—particularly Mongolia’s immediate neighbors with direct strategic and economic interests—may be systematically injecting disinformation into Mongolia’s information space. Among these, the two primary external actors identified are Russia and China.

Russia is widely recognized as one of the most active producers and disseminators of politically motivated disinformation targeting other nations (Bennett & Livingston, 2018). Analysts typically divide its strategy into two spheres: the “Near Abroad”, referring to former Soviet republics and states within its historical sphere of influence, and the “Far Abroad”, referring to the rest of the world (Kleinschmidt, Miniailo, Gabdulhakov, & Nguyen, 2023). Russian disinformation is characterized by highly structured narratives that are disseminated through multiple channels at high frequency, allowing these messages to gradually take hold in public consciousness (Paul & Matthews, 2016; Robbins, et al., 2020). Although the narratives are often adapted to local contexts, several recurring themes have been identified across different countries, such as:

- portraying Western countries as morally degenerate,
- framing LGBTQ+ advocacy and liberalism as threats to “traditional values,” with Russia positioned as their defender,
- emphasizing the discrimination of Russian-speaking minorities, and
- spreading claims that Western governments are developing biological weapons or new pandemics in secret laboratories (Andrzej, Łukasz, & Stanisław, 2023).

In Russia’s case, it appears that long-term information campaigns have been conducted to influence public opinion in Mongolia in line with Moscow’s geopolitical interests. A recent study by NEST (2025) analyzed around 20,000 Facebook posts from sixteen of the most active pro-Russian accounts in Mongolia to identify the dominant narratives of Russian-aligned disinformation. The analysis found that the most frequent narratives included messages praising and glorifying Russia, content justifying or supporting Russia’s actions in the Russia–Ukraine war, and posts focused on Mongolia’s domestic politics. In addition to these, anti-Western, anti-uranium, anti-Israel (pro-Palestine), anti-China, and anti-vaccine content was also widespread. Engagement patterns showed that activity on these accounts intensified around key political and social events—for instance, ahead of the 2024 parliamentary elections, during the launch of Mongolia’s HPV vaccination program, and in September 2024 when Russian President Vladimir Putin visited Mongolia. Interestingly, some previously inactive accounts became active again in January 2025, coinciding with the Mongolian government’s signing of an investment agreement with France’s Orano Mining company. These findings suggest that **pro-Russian propaganda networks are already operating in Mongolia. Their apparent objectives are to weaken Mongolia’s “third neighbor” policy, erode democratic values, bolster Russia’s reputation and influence, and sow confusion and division among the public.**

In contrast, interview participants noted that **China rarely spreads outright false information in Mongolia but instead seeks to shape favorable public perceptions by influencing the media environment** (Interview #14). The findings suggest that two main strategies are commonly used. First, China actively promotes soft power influence through sustained media cooperation and journalist

engagement. Each year, Chinese authorities invite Mongolian journalists to participate in sponsored trips, training programs, joint forums, and reporting exchanges. The All-China Journalists Association also maintains close cooperation with the Confederation of Mongolian Journalists, providing access to pre-produced materials and co-organized events. These activities are designed to build long-term relationships with Mongolian media professionals and to encourage positive coverage of China in domestic outlets. Second, participants reported instances where the Chinese Embassy in Mongolia directly attempted to influence editorial decisions. Such interventions reportedly include pressuring media organizations to remove content deemed harmful to China's image or interests, offering bribes, or requesting that certain topics or incidents not be covered at all (Interview #14). These accounts suggest that while China's approach to disinformation in Mongolia is more subtle than Russia's, it nonetheless relies on strategic media influence and censorship pressure to advance its political and image-related objectives (Interview #14).

A common feature of foreign disinformation activities is their interconnection with domestic actors and their ability to leverage local channels for amplification. Countries such as Russia and China tend to disseminate their narratives in Mongolia indirectly, using local intermediaries such as media outlets, politicians, and troll networks. For example, propaganda content produced by Russian or Chinese sources is often directly copied or translated and then republished by Mongolian Facebook pages or news websites, demonstrating how foreign messages enter the country's information space through domestic platforms (Interviews #4, 5, 9). Interview participants also noted cases where Mongolian politicians themselves appeared to spread or endorse disinformation aligned with foreign interests, suggesting a deeper fusion between external propaganda and internal political communication.

1.1.4. PR and media teams

Using private firms to conduct political manipulation and spread disinformation internationally has become a common practice. For example, a study by Bradshaw et al. (2021) covering 81 countries found that more than 65 companies offering political information manipulation services were operating in 48 countries, and this number continues to grow each year.

In the case of Mongolia, interview participants stated that the aforementioned originators/sponsors also rely on PR and media teams to disseminate disinformation (Interviews #2, 3, 6). According to them, these teams play two main roles within the disinformation ecosystem. First, as **producers**, they prepare contents and narratives for disinformation and distribute them to other actors. Second, as **facilitators**, they conduct organized and systematic political manipulation and disinformation campaigns using media outlets, influencers, troll networks, and bots. A participants mentioned that such teams exist in Mongolia and offer services to political actors (Interview #15).

1.1.5. Media organizations and journalists

While professional and "traditional" news outlets tend to play a relatively limited role in spreading disinformation according to media experts and journalists, several actors within the Mongolian media landscape – especially newly emerging digital media – still participate in or enable its dissemination, often due to financial pressures/gains or political and business interests (Interviews #3, 4, 5, 6, 10, 12). For example, a media monitoring study conducted by Reporters Without Borders and the Press Institute of Mongolia (2016) found that 29 out of 39 media organizations (about 74%) had owners or investors with political affiliations. Representatives from the media sector interviewed for this research confirmed that this situation remains largely unchanged. They observed that during major

political events, news outlets often align with opposing political sides, reflecting the influence of ownership and partisanship in shaping editorial content.

In addition, some politicians, government agencies, and businesses enter into so-called “cooperation agreements” with media organizations to promote their activities to the public. The revenue generated from such agreements accounts for a significant share of media outlets’ income, creating risks of financial and editorial dependence on the state (Baasanjav, Nielsen, & Myagmar, 2024). Notably, **some of these contracts include explicit clauses prohibiting the publication of negative or critical information** about the contracting politician or organization (G. & E., 2024). While this practice does not necessarily involve the direct dissemination of disinformation, interviewees emphasized that it undermines citizens’ right to accurate and balanced reporting (Interviews #2, 6, 11, 14, 15). In practice, such arrangements are often referred to as “silence contracts.” **Interestingly, in recent years this phenomenon has expanded beyond institutions: politicians and state agencies have begun to sign closed agreements with individual journalists.** As a result, some journalists use their personal social media accounts to circulate sponsored content, which can easily be mistaken by audiences for independent news—blurring the line between journalism and propaganda (Interview #14).

With the rapid growth of digital information flows, the term “pocket websites” (халаасны сайтууд) has gained increasing attention in Mongolia’s media landscape. Interview participants described these as websites with no identifiable editorial team, staff, or address, that often do not pay taxes, and that operate under the control or influence of a single owner’s interests or viewpoints. According to an Eguur.mn news website (2022) analysis, out of approximately 390 registered news websites in Mongolia, only 20 to 60 could be classified as having legitimate editorial structures, while the remaining around 300 function as editorially unregulated “pocket websites.”. Experts noted that such websites are among the main channels for spreading disinformation. In many cases, a single individual owns multiple domain names and runs several pocket sites simultaneously, often entering into silence contracts with government agencies, businesses, or politicians to publish content favorable to one side (Interviews #3, 5, 6, 11, 14).

Moreover, while professional media organizations generally strive to adhere to editorial standards, professional ethics, and journalistic norms, their **fact-checking capacity remains weak** (Baasanjav, Nielsen, & Myagmar, 2024). As a result, disinformation is sometimes spread unintentionally. Interview participants also acknowledged this as a persistent challenge within the Mongolian media environment.

1.1.6. Social media influencers and public figures

Both international studies (Palacios López, Bonete Vizcaíno, & Gelado Marcos, 2023) **and the findings of this research indicate that social media influencers play a growing role in the spread of disinformation** (Interviews #1, 3, 4, 5, 6, 8, 13). An our analysis of verified disinformation posts by Mongolia’s two main fact-checking organizations, Factcheck.mn and MFCC, also supports this: the top three sources of disinformation identified were Facebook influencers with approximately 82,000, 23,000, and 7,000 followers, respectively.

Influencers have become major sources of information for many Mongolians because they (1) command large and loyal followings, (2) produce and distribute content regularly, and (3) possess strong skills in crafting messages that reach wide audiences. **In doing so, they often fill the informational gaps left by traditional media and official sources, such as government or news outlets.** For instance, a comparative analysis by Eguur.mn (2022) found that when reporting on the same event, the average engagement on posts by five Facebook influencers was twice as high as that of the most-visited five

news websites. The report also noted that influencer advertising and content promotion rates exceed those of news sites. Together, these findings illustrate that **influencers have become central actors in Mongolia's information ecosystem**—capable of shaping public narratives and, in some cases, amplifying false or misleading information.

However, not all influencers involved in disinformation play the same role. Interviewees described two distinct types (Interview #2). **The first group includes celebrities and well-known public figures, such as entertainers and lifestyle influencers, who rarely post political content.** They typically avoid sharing overtly false information because they are attentive to preserving their public reputation and commercial image. Even so, during politically sensitive moments such as elections, these high-profile figures occasionally take positions or publicly endorse a specific politician or party. By doing so, they can subtly steer public sentiment while maintaining plausible deniability about any political intent.

The second group consists of influencers who are more deeply embedded in online discourse. Some have large followings and recognizable identities (activists, political dissidents, journalists, etc.), while others operate with much smaller audiences but demonstrate persistent engagement in agenda-driven messaging. According to interviewees, these actors are willing to push provocative, misleading, or false narratives more frequently and systematically (Interview #2).

Furthermore, the term *"khiamchin"* (literally meaning "sausage person") has emerged and entered everyday usage to describe social media users, who share paid content, especially biased or misleading information. The origin of this term can be traced back to the platform Twitter (now X), where a group of popular users simultaneously promoted a specific sausage brand through sponsored posts. Since then, the label *"khiamchin"* has become widely used across digital platforms. Initially employed in a humorous or sarcastic sense, the term has gradually taken on broader connotations, referring to individuals who disseminate paid or one-sided content, express partisan political or social views, or act as paid propagandists.

1.1.7. Troll networks

Troll networks—coordinated groups of fake or manipulated online accounts—have become one of the main tools for amplifying and spreading disinformation in Mongolia, as illustrated by the following evidences. First, according to the National Police Agency, an estimated 400,000 fake social media accounts may have been created in Mongolia in 2023. By the end of that year, law enforcement reported that 50.3% of the detected cases involving fake accounts and disinformation dissemination had been successfully identified or resolved. Second, during 2019–2020, a group of individuals admitted to conducting phishing attacks using a platform called "Z Shadow." They hacked into numerous Facebook accounts, changed passwords and contact information, deleted user data, and sold or used the accounts for electoral and online manipulation purpose. The Sukhbaatar District Criminal Court found them guilty under Article 26.1, Section 2 of the Criminal Code, which covers "unauthorized interference with online information networks, including deleting, altering, modifying, or adding data, rendering it unusable, or disrupting normal operations," and sentenced them accordingly (185/2021/0460/Э, 2021). These official records and documented cases clearly demonstrate that organized troll networks are active in Mongolia, serving as key instruments for spreading disinformation and manipulating public opinion in the digital environment.

According to the interview participants, **troll networks in Mongolia have become highly organized and now operate as a distinct industry, often funded by political and business interests** (Interviews #5, 15). Troll activity typically intensifies during elections, state budget and other major political events, with

the **primary goals of creating the illusion of public support for certain politicians, defaming or discrediting opponents** (MCIR, 2021), and shaping or redirecting public opinion on divisive or controversial issues.

Participants also suggested that, beyond domestic political and business actors, foreign propaganda networks may be involved in managing some troll operations or obtaining their services in Mongolia. However, they emphasized that this assumption is based on observations rather than verified evidence, as no conclusive proof has yet been established.

1.1.8. Citizens and the general public

The broadest group of actors in the information environment are ordinary citizens and social media users themselves. While most do not intentionally create false information, they contribute to its spread by sharing unverified or sensational content, thereby amplifying the reach and impact of disinformation.

There are multiple reasons why individuals share false or misleading information. According to Marwick (2018), people often do so not simply to inform others, but to express or affirm their personal beliefs, political stance, or sense of belonging to a social group. The drivers of this behavior are not limited to individual attitudes or beliefs—they also include broader sociotechnical factors, such as social structures, cultural contexts, and the algorithms of digital platforms that shape what users see and engage with. These dynamics will be discussed in more detail in the following sections.

In summary, Mongolia's disinformation landscape is shaped by a wide array of actors operating at different levels. It includes state-initiated and politically motivated disinformation, foreign propaganda influences, and the involvement of intermediary actors such as non-professional media outlets, influencers, and troll networks. Alongside these, citizens and social media users—through both intentional and unintentional actions—also play a role in sustaining the overall flow of disinformation. Together, these interconnected elements form a complex and multilayered disinformation ecosystem in Mongolia.

1.2. Channels and Techniques

To reach wider audiences and maximize impact, different actors disseminate disinformation through specific channels and platforms, tailoring their methods to each medium. This section identifies the most common channels and techniques used in Mongolia to circulate disinformation.

1.2.1. Social media and dissemination techniques

In Mongolia, social media—particularly Facebook—has become one of the main channels for **receiving and sharing information**, given its widespread use across the population. As digital infrastructure improves and the adoption of digital technologies increases, the number of traditional media outlets (television, radio, newspapers) has been steadily declining (Press Institute of Mongolia, 2025). At the same time, the public's reliance on online sources for news and information continues to grow. A national survey conducted by GGGI & IRIM (2023) found that, after television (73.6%), the second most common source of information for Mongolians on key issues such as politics, the economy, health, education, and the environment is the internet—including websites and social media platforms—used by 63.7% of respondents. Among young people aged 18–34, the internet is the primary source of information, with 95.1% of social media users reporting that they use Facebook. According to DataReportal (2024), 83.9% of Mongolia's total population uses the internet. Among individuals aged

13 and above, 100% are Facebook users, while 37.6% use Instagram and 4.4% use X (formerly Twitter)—illustrating the country’s exceptionally high rate of social media engagement.

Because of its large and active user base, as well as the ease and low cost of sharing information, Facebook has become the dominant platform for disinformation in Mongolia. Data from the Fact Check Mongolia initiative and Factcheck.mn indicate that 89% of all verified false or misleading information in Mongolia circulates through social media—primarily Facebook—while only 11% spreads through traditional media channels (Fact Check Mongolia, 2021). Similarly, findings from a media monitoring study by IRI & Press Institute of Mongolia (2021) showed that during the 2021 presidential election, about 80% of Facebook posts related to the election contained distorted, misleading, or false information, 13% were direct political advertisements, and only 7% qualified as journalistic content. In other words, the Facebook environment allows disinformation to be disseminated quickly, widely, and strategically, reaching large audiences in a very short time. In contrast, X (formerly Twitter) hosts discussions on certain political and social topics but has a smaller and less active user base, limiting its overall impact compared to Facebook.

Findings from the interviews and secondary sources suggest that **there are organized groups systematically disseminating false information on Facebook (Ya. & D., 2019), and that specific mechanisms appear to be in place.** While the available data are not sufficient to prove this conclusively, the existing evidence allows for a reasonable assumption.

Disinformation produced to serve major interests—especially political or geopolitical goals—appears to be planned and created by dedicated PR teams or agencies. This is indicated by the large volume of high-effort content circulating on Facebook, including professionally designed images, memes, edited videos, creative articles, and carefully crafted narratives that require significant time, money, and skill (Interview #6). Following guidance from these PR teams, the prepared content is then repurposed and posted by previously mentioned disseminators—influencers, troll networks, pocket websites, journalists, and Facebook pages—across their own accounts to reach the public. In doing so, these actors exploit Facebook’s structure and features to their advantage, using platform-specific tactics that rapidly accelerate the spread of disinformation.

First, the content produced and posted by these accounts is amplified through troll networks, which share it both on their own pages and in Facebook groups with large or strategically targeted audiences. The posts are typically tailored to align with the beliefs, values, and interests of each group’s members, making them more likely to be accepted and spread organically within those communities. For instance, Bolorchuluun Ya. & Iderjargal D. (2019) analyzed around 200 pieces of false information on Facebook and found that they had been disseminated by approximately 300 fake accounts, across 59 groups and 138 pages. A total of 92 websites were also involved in the distribution, most of which lacked editorial oversight and could not be classified as professional media outlets. Interestingly, most of the groups where disinformation circulated were themselves managed by fake accounts. In total, these pieces of disinformation were shared 125,500 times by 1,076 unique sources, reaching at least 222,000 users. This demonstrates the massive scale and efficiency of disinformation diffusion within Facebook’s ecosystem in Mongolia.

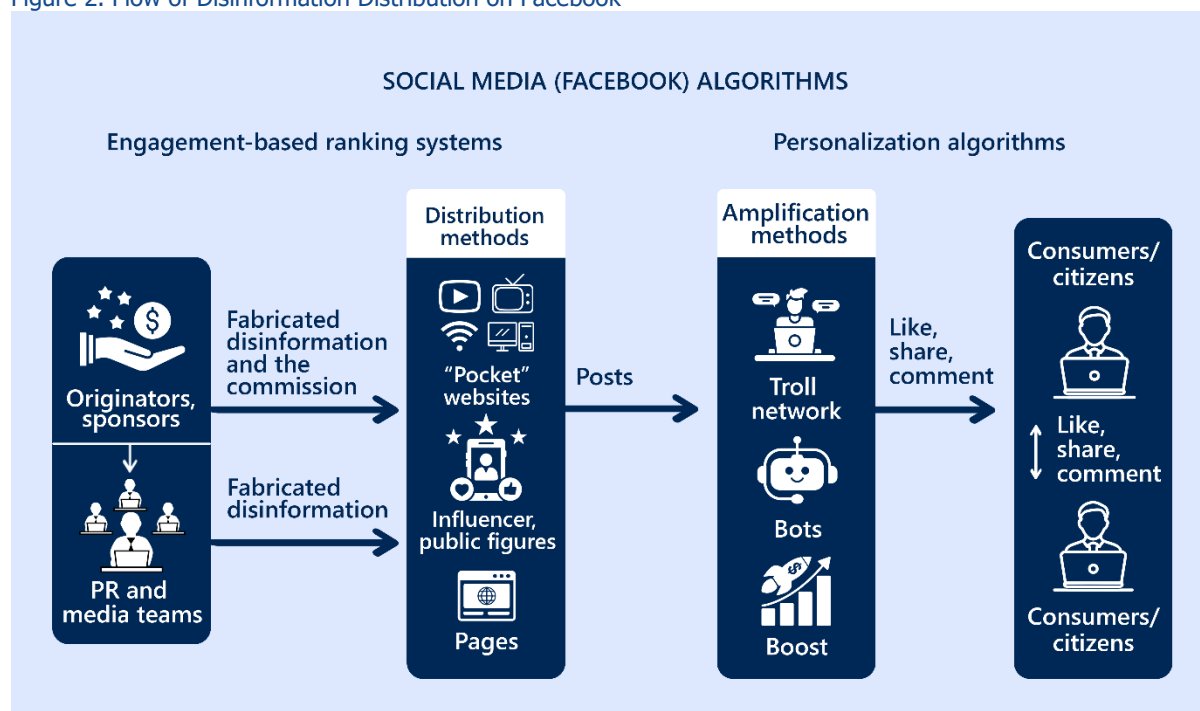
In addition, to extend the reach and visibility of false information, disinformation actors often use Facebook’s paid promotion tools (Boost) and bot accounts (Interview #4, 9). The paid promotion helps push content to broader audiences, while bots are employed to artificially inflate engagement metrics—such as likes, comments, and shares—creating the illusion that the content enjoys widespread public

support. Once this fake engagement is generated, Facebook's algorithm automatically amplifies the post's visibility, causing it to spread even further among ordinary users.

The algorithms of social media platforms, particularly Facebook, are designed to maximize user engagement and personalize content, but in doing so, they inadvertently facilitate the spread of disinformation (Ceylan, Anderson, & Wood, 2023; D., 2017). Engagement-based ranking systems prioritize posts that generate more reactions—likes, comments, and shares—by promoting them higher in users' feeds. As a result, sensational or emotionally charged content, including false or misleading information, is often amplified more readily (Ceylan, Anderson, & Wood, 2023). Meanwhile, personalization algorithms filter and display content based on users' previous activity and interests. This means that users are shown more of the same type of content they have previously interacted with, reinforcing existing beliefs and preferences (Zimmer, Scheibe, Stock, & Stock, 2019). Consequently, once a piece of disinformation captures users' attention, the algorithm tends to resurface it repeatedly, ensuring high visibility and engagement. Through this process, low-quality or unreliable sources gain disproportionate exposure, and misleading narratives can spread rapidly and persistently across large audiences (Bandy & Diakopoulos, 2023).

Of course, algorithms themselves do not create disinformation; rather, they interact with users' information behaviors, amplifying the spread of misleading content. This dynamic can be illustrated through the example of vaccine-related disinformation. During the COVID-19 pandemic, numerous false and emotionally charged claims about newly developed vaccines circulated online—such as “vaccines cause infertility” or “vaccines contain tracking chips.” These narratives evoked strong emotions of fear and anger, prompting users whose existing beliefs aligned with the messages to react and engage by liking, commenting, or sharing the posts. Once a user repeatedly interacted with such content, the algorithm interpreted this engagement as interest, showing them even more of the same type of material. Over time, users were increasingly exposed to similar content, surrounded by others with comparable views, and thus confined within narrow, self-reinforcing information bubbles. Within these bubbles, their beliefs became more entrenched, and users who had come to fully trust false narratives began to share them further, gaining positive reinforcement through engagement metrics such as likes and shares. This cycle gradually conditioned users' online habits. In short, social media algorithms amplify disinformation by aligning with users' engagement patterns, which enables false content to spread far more widely. As a result, ordinary users—often without realizing it—become key agents in the distribution of disinformation, a point strongly emphasized by interview participants.

Figure 2. Flow of Disinformation Distribution on Facebook



Source: Authors

As for social media platforms other than Facebook, there is little to no existing research or data specifically examining the spread of disinformation. According to interview participants, the prevalence of false information on other platforms remains relatively low, but there are signs of a gradual increase in recent years (Interviews #5, 6, 9).

1.2.2. Media outlets and dissemination techniques

Although overtly false information is less common in mainstream media, the sector still plays a notable role in the spread of disinformation through several mechanisms as mentioned above.

First, as discussed earlier, many media organizations in Mongolia are owned or influenced by political and business interests. As a result, they often shape coverage to align with the priorities of their owners or funders—for example, by suppressing certain information, omitting context, or excluding opposing viewpoints. While such practices may not always constitute direct falsehoods, they distort narratives and can mislead the public by presenting a biased or incomplete picture. In addition, some actors operate non-professional online news sites with minimal staff and no editorial oversight, using these outlets to circulate disinformation. These websites typically distribute their content via Facebook, creating the illusion of credibility and influencing public opinion by appearing to be legitimate news sources.

Second, government agencies and businesses often sign “cooperation agreements” with media organizations to promote their activities. Such agreements frequently include clauses prohibiting the publication of negative or critical content about the contracting party. Known in practice as “silence contracts,” these arrangements can undermine editorial independence. Within the framework of these agreements, state institutions sometimes provide ready-made media content that is misleading or unverifiable, which is then published simultaneously across multiple outlets. Interview participants noted that this form of mass content dissemination often functions as propaganda or manipulation, shaping public narratives while limiting access to balanced reporting.

Third, foreign countries also seek to influence Mongolian media in various ways—sometimes through soft power strategies such as cooperation and exchange programs, and at other times through coercive methods, including attempts to suppress, control, or impose specific narratives that serve their own political or strategic interests.

According to the interview participants, the parties use the following methods to disseminate false and misleading information through the media:

- Preparing and distributing commissioned news and professional-looking programs;
- Simultaneously disseminating identical messages or content across multiple channels;
- Producing and distributing information that presents only a one-sided perspective.

In recent years, interview participants also noted that during moments of political tension or controversy, especially when the government or ruling authorities face criticism, there have been instances where diversionary media tactics appear to have been used (Interviews #5, 7). For example, during national budget discussions or the adoption of major policies and decisions, sudden waves of high-profile crime or scandal coverage often dominate the news cycle, drawing public attention away from sensitive political developments. In some cases, previously restricted or concealed information is deliberately released to the public at these moments, suggesting a coordinated effort to redirect public focus and manage public perception through controlled media narratives.

1.3. Disinformation Content

Understanding the narratives embedded in disinformation—and how these narratives evolve over time, is essential to analyzing its impact. The most common types of disinformation content include false or misleading narratives, manipulated or doctored images, and, more recently, synthetic content generated with the help of artificial intelligence.

In Mongolia, the most frequently circulated disinformation themes can be grouped into three broad categories: (1) content related to health and medicine (Interviews 5, 6, 9, 14); (2) content concerning social and political events (Interviews 2, 3, 4, 6, 9, 14); and (3) financial or investment-related scams (Interviews 5, 6, 7). Due to changes in people's media consumption habits, human attention has weakened and the ability to maintain sustained focus continues to decline. As a result, people are reading fewer long news articles and texts, and the tendency to receive information through short, few-second videos has increased. In addition, methods of misleading audiences by using attention-grabbing headlines and striking images have become common (Interviews 3, 9, 14). Content intentionally designed to evoke readers' and audiences' memories and emotions is also observed (Interviews 1, 4, 8, 9).

As part of this study, an analysis was conducted on verified false or misleading claims reviewed by Mongolia's two main fact-checking organizations, Factcheck.mn and the Mongolian Fact-Checking Center (MFCC). In total, 1,618 fact-checked articles published on their official websites between January 2020 and September 2025 were examined to identify the dominant topics, patterns, and techniques of disinformation circulating in Mongolia.

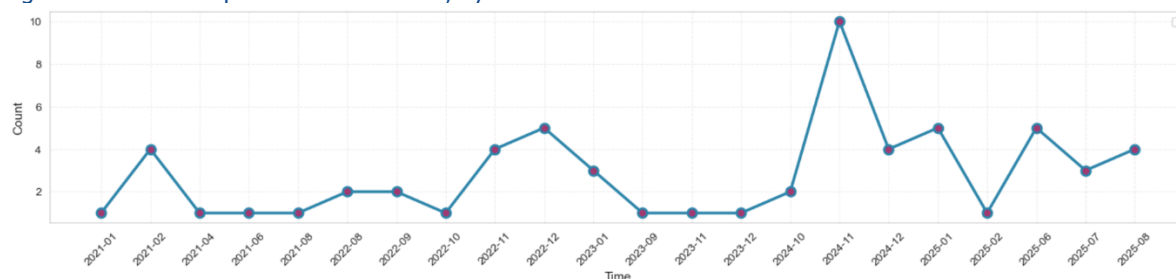
It is important to note that the analysis did not examine the full narrative structure of each article but instead focused on categorizing the content according to general themes and subtopics. Incomplete entries were excluded from individual analyses due to missing data fields. Furthermore, the 1,618 analyzed items do not represent all disinformation circulating in Mongolia; they include only those

selected and verified by the two fact-checking organizations within the specified timeframe. These findings therefore reflect a representative sample of online disinformation rather than its full scope.

The collected data were organized into eight main thematic categories and 28 subcategories. Among these, the most prevalent topic was health-related disinformation, which accounted for the largest share of verified false or misleading claims. According to the interview participants, while disinformation on some topics tends to be seasonal or linked to specific events, health-related misinformation has become consistently present (Interviews 3, 5, 13).

In terms of topics, unproven advice and treatments, COVID-19 vaccines, the cervical cancer (HPV) vaccine, and anti-vaccine content of all kinds are most common. A specific group of users who consistently post anti-vaccine content. In November 2024, there was a sharp increase in false information about the human papillomavirus (HPV) vaccine. In terms of narrative, anti-vaccine content typically uses fear-inducing false claims and images, asserting that vaccines are harmful to health, life, and the genetic heritage of Mongolians, or claiming that countries around the world have stopped vaccinations.

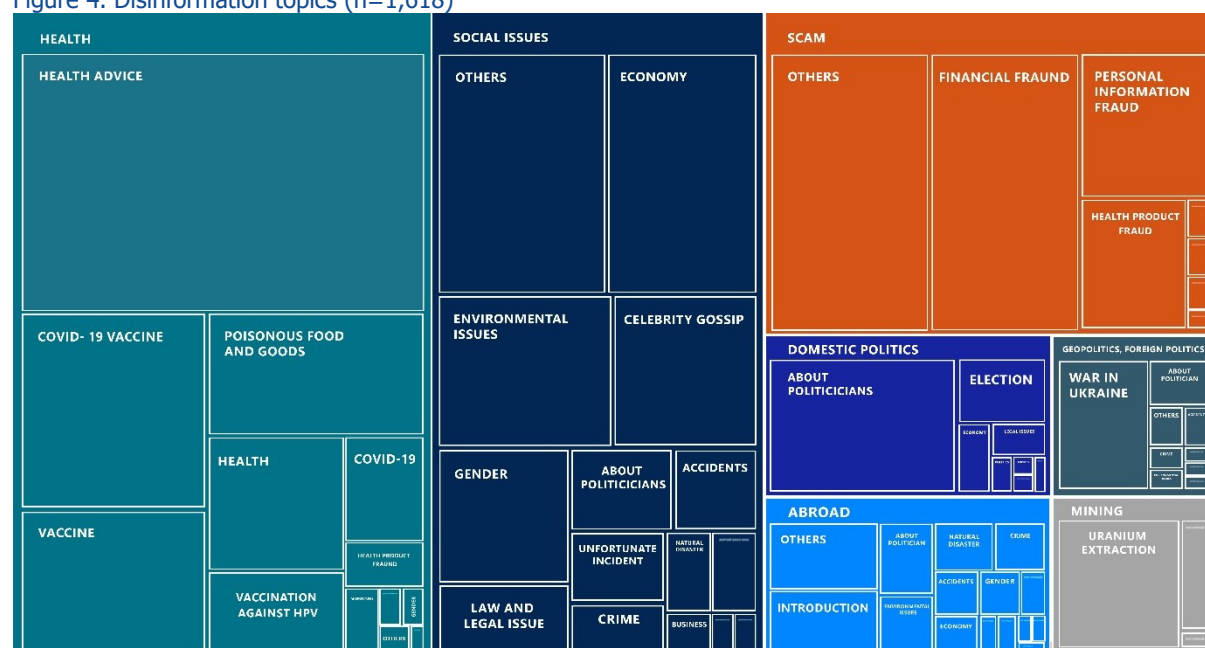
Figure 3. Number of posts about 'Vaccine', by month



This large amount of vaccine-related misinformation may lead to consequences that pose risks to public health. For example, measles—a disease that can be completely prevented through vaccination—broke out in February 2025, resulting in 13,000 infections and 11 deaths (News.mn, 2025).

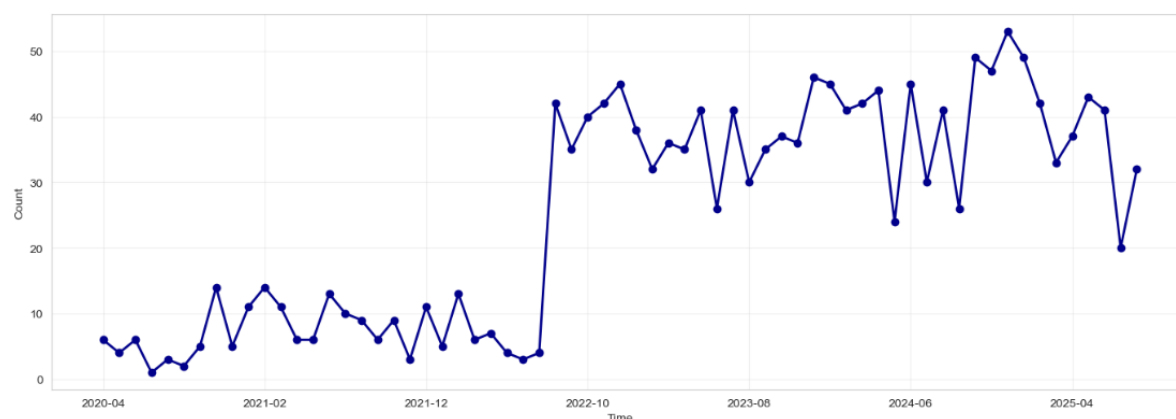
During the interviews, it was also mentioned that the accounts spreading vaccine-related misinformation often overlapped with those disseminating content about the Russia–Ukraine war or opposing uranium mining (Interviews 4, 5).

Figure 4. Disinformation topics (n=1,618)



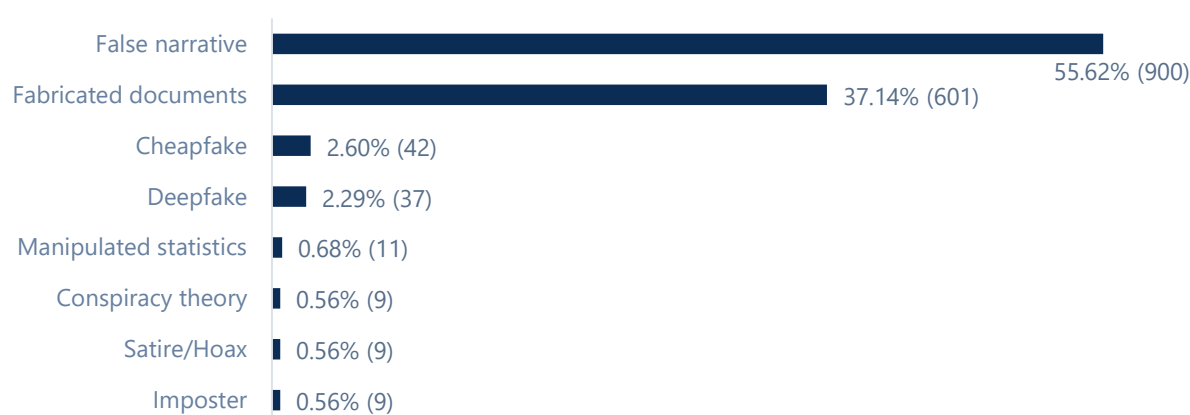
The following figure illustrates how the distribution of disinformation evolved over time, showing fluctuations in the volume of verified false or misleading content across the analyzed period. However, the figure will not represent how disinformation surges or decreases overtime, but rather number of identified disinformation by fact checking centers overtime. The dynamics presented in the graph can be affected by multitude of factors.

Figure 5. Number of posts checked, by month (n=1,618)



During this period, most of the verified disinformation cases involved fabricated narratives or the manipulation and distortion of factual information to mislead audiences. Instances of deepfake-generated videos were relatively few, indicating that while synthetic media is emerging, traditional forms of falsification and selective framing remain the dominant techniques used in Mongolia's disinformation landscape.

Figure 6. Disinformation tactics (n=1,618)



Domestic Political Disinformation

The period when domestic political disinformation spreads most widely is typically during election cycles. Because the campaign period is short and opportunities to correct already-circulated false information are limited, conditions emerge in which defamatory content aimed at damaging opponents' reputations is intentionally disseminated. Interviewees noted that with the widespread availability of this technology, organized troll groups are used to rapidly distribute such content across social media (Interview 6).

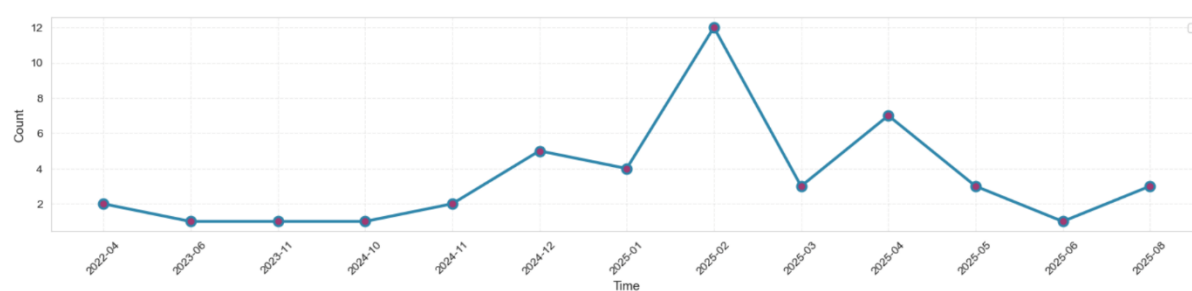
Interview participants also mentioned that, in certain circumstances, some government institutions and officials themselves have been observed spreading false or misleading information. According to them, such information may be intended to obscure the public's understanding of reality or undermine the credibility of competing political institutions. For example, interviewees noted the recurring spread of content that attacks the reputation of the judiciary, consists of claims that are difficult to verify or refute, and originates from unclear sources (Interviews 5, 7).

It has also become common for false information related to current events or specific socio-economic developments to be spread, creating distorted public perceptions and contributing to misunderstandings between policymakers, the broader public, and local communities. For example, when Mongolia signed an investment agreement with France in January 2025 to cooperate on a uranium project, fact-checking centers reported a surge in related misinformation. As the issue drew public attention—particularly, concerns about the environmental impact of uranium extraction and radiation safety—false and misleading content spread widely online in February. Some examples of such narratives include claims such as:

- "After experimental uranium extraction took place in Ulaanbadrakh soum of Dornogobi in 2012, 10,860 livestock miscarried in the province that same year,"
- "Foreign scientists have confirmed that radiation levels in Ulaanbadrakh are equivalent to those in Chernobyl,"
- "A two-mouthed, three-eyed goat was born due to uranium poisoning."

These posts typically rely on misleading data, images or videos taken from unrelated events, or entirely fabricated narratives.

Figure 7. Number of posts about 'Uranium extraction', by month



These types of messages are also connected to “resource nationalism” and may be used as a tool to shape public sentiment against foreign investment, particularly that of “third neighbor” countries. During the interviews, it was mentioned that Mongolian actors had participated in events organized by certain organizations that actively employ resource-nationalist narratives (Interview 5). However, more detailed evidence would be required to establish whether there is any concrete relationship between these disinformation campaigns and the organizations in question.

2. Impacts of Disinformation on Society and Individuals

The impact of disinformation is multifaceted and complex, making it one of the most challenging phenomena to measure (Warin, 2024). Internationally, this issue has been relatively well studied. Existing research has explored the effects of disinformation across different domains of science (such as health, economics, and politics), levels of influence (individual, institutional, and societal), affected actors (government, media, and public), and the degree to which its effects can be empirically verified (factual vs. indeterminate).

From a **national security** policy perspective, disinformation is viewed as a serious threat to national stability, capable of distorting the information environment, damaging diplomatic relations, aggravating internal tensions, and triggering violence or conflict (Mohammed Hafiz Nabila, Matilda Thompson, 2025).

In the **health sector**, disinformation has hindered the implementation of evidence-based preventive measures and, as seen during the COVID-19 pandemic, has led to fatal outcomes for many (Posetti, 2021; Sezer Kisa, Adnan Kisa, 2024).

From an **economic standpoint**, researchers estimate that disinformation causes approximately USD 78 billion in direct and indirect global losses annually, of which USD 17 billion result from poor financial decisions based on false information (University of Baltimore, CHEQ, 2019).

Meanwhile, **political scientists** emphasize that the most severe consequence of disinformation is the *erosion of the information environment that underpins democracy*, ultimately shaking the core values of democratic systems (Colomina, C.; Sánchez Margalef, H.; Youngs, R., 2021).

The **strength of disinformation's impact** differs significantly across countries, largely reflecting each society's level of *resilience*. Although no global index yet measures this resilience, comparative research (Humprecht, E., Esser, F., & Van Aelst, P., 2020) suggests that certain structural conditions heighten vulnerability. High levels of **social polarization**, the spread of **populist communication**, **low trust in news organizations**, and **weak public-service media** undermine a society's ability to filter false information. Economic and digital factors, such as **small advertising markets and intensive social-media use**, further intensify exposure by rewarding attention-grabbing content. Overall, a country's resilience to disinformation depends not only on technology or fact-checking capacity but also on the broader political culture, media integrity, and social cohesion that sustain its information environment.

Although studies specifically examining the impact of disinformation in Mongolia remain limited, several relevant assessments have been conducted in recent years. For example, in 2024, the National Institute for Security Studies (NISS) evaluated Mongolia's resilience to disinformation using four structural indicators:

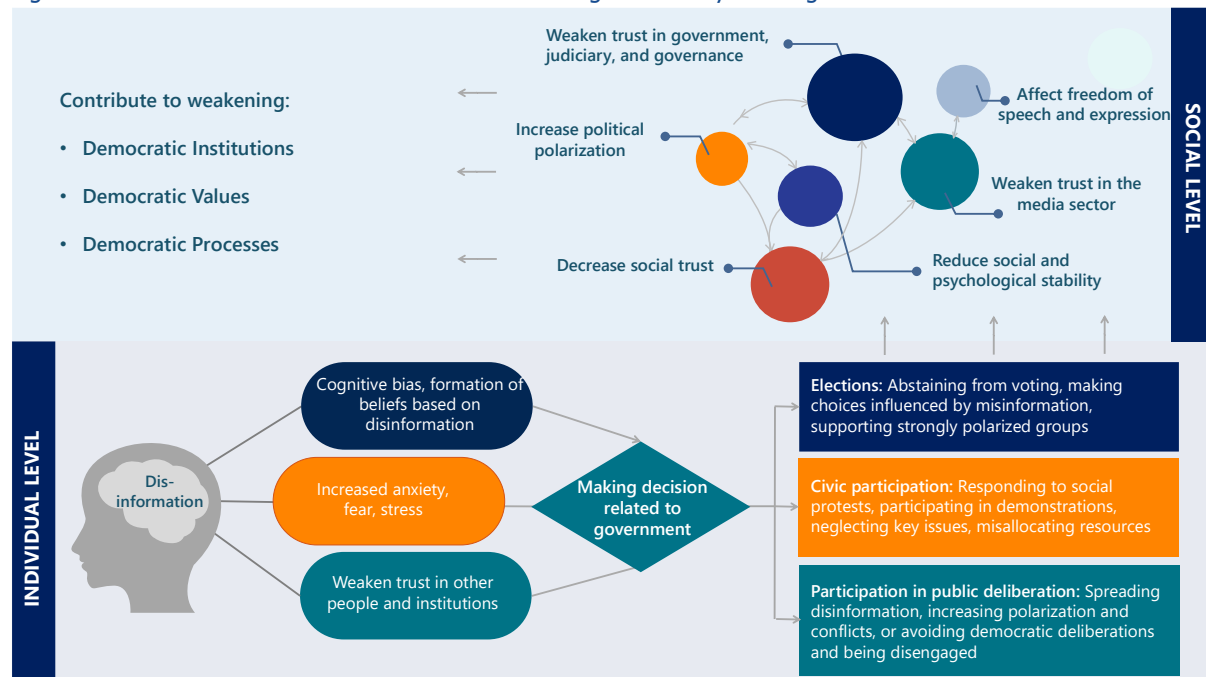
1. The economic independence of the journalism sector;
2. The extent to which journalistic content meets citizens' intellectual and informational needs;
3. The level of unity and professional cohesion among media organizations; and
4. Citizens' and the general public's digital literacy skills.

The study concluded that Mongolia performed below satisfactory levels across all four indicators, indicating that the country's overall resilience to disinformation remains weak (NISS I. w., 2025).

In addition, NEST & OptimalNMax conducted a 2024 study that examined the individual-level *factors* influencing the spread of disinformation, while the International Republican Institute (IRI) has regularly included questions related to public attitudes toward disinformation in its public opinion surveys since 2020.

Drawing on insights from these studies, along with qualitative interviews with 15 experts from the media and political sectors, this section analyzes the observable impacts of disinformation in Mongolia. The discussion focuses primarily on the effects of **politically related disinformation**, viewed through both **individual and societal levels** of impact.

Figure 8. How Disinformation Contributes to Weakening Democracy in Mongolia



The study results indicate that politically related disinformation triggers significant **psychological stress, frustration, and anxiety** at individual level. It also generates widespread **cognitive distortions**, leading individuals to form false or misleading perceptions about political issues.

At societal level, when exposure to such disinformation is **repeated over time** and disseminated through multiple techniques and channels, it gradually erodes citizens' belief systems and confidence in democratic processes. As confusion and disinformation accumulate, public trust declines—first toward the media, and subsequently toward government institutions and other public bodies, and democratic processes. This erosion of trust represents one of the **most severe and far-reaching consequences of disinformation**.

The weakening of social trust further fuels political polarization and societal division. On the other hand, the measures undertaken to counter disinformation—if not carefully designed—have sometimes given rise to new challenges in the areas of human rights and media freedom, as highlighted in our mapping study findings.

Together, these dynamics threaten the stability, functioning, and core values of democratic institutions, gradually undermining the legitimacy of democracy itself in long term.

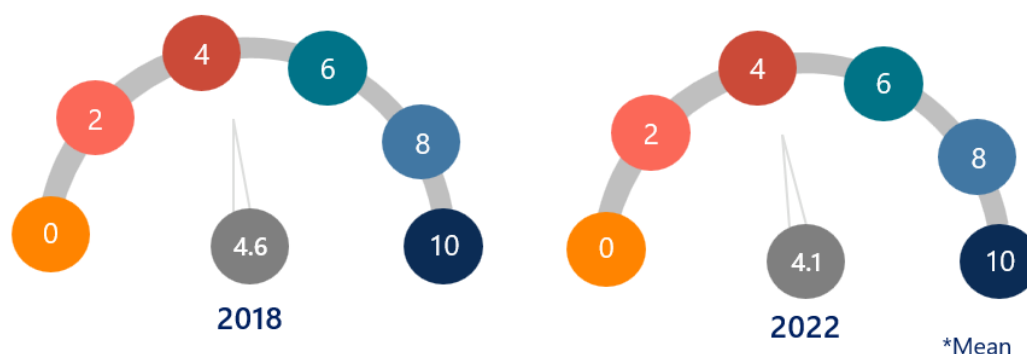
The following section elaborates on these findings in greater detail, supported by relevant evidence.

2.1. Impact of Disinformation at Social Level:

1. Disinformation and the Erosion of Interpersonal Trust: Qualitative findings reveal that one of the most common impacts of disinformation in Mongolia is the erosion of interpersonal trust among citizens. As people are repeatedly exposed to and deceived by false information, they gradually become more skeptical—not only toward specific content but also toward others in general (Interviews 1, 2).

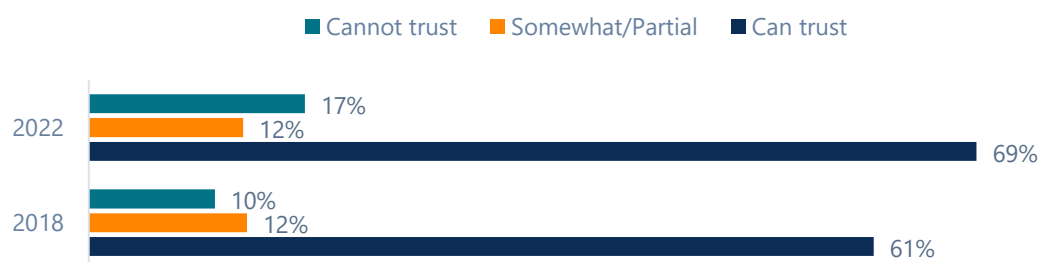
According to the *“Social Well-being Survey of Mongolians”*, the **average level of trust in other people** (measured on a 0–10 scale) declined from **4.6 in 2018 to 4.1 in 2022** (Byambasuren.Ya, 2024) (see Figure 1). Similarly, the share of respondents who agreed with the statement, *“Most people can be trusted”*, decreased, while the proportion who said, *“One should be cautious and not trust others easily,”* increased from **61% in 2018 to 69.7% in 2022**. The research team concluded that the **influence of disinformation** was among the contributing factors behind this decline (IRIM, 2018,2022). Although, this figures do not specifically suggest direct influence of disinformation to declining social trust, literature and interview findings suggest a connection between the two.

Figure 9. Changes in Interpersonal Trust among Mongolians (Average Score, 0–10 Scale), 2018–2022
Generally speaking, do you think most people can be trusted?



Source: IRIM, *Social Well-being Survey of Mongolians*

Figure 10. “Generally speaking, do you think most people can be trusted?”



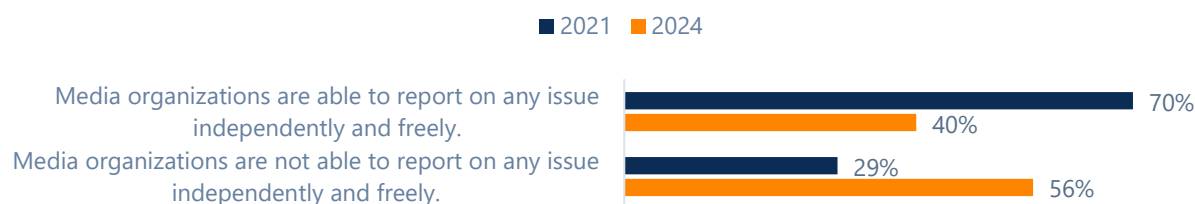
Source: IRIM, *Social Well-being Survey of Mongolians*

In addition to these statistical trends, interview participants emphasized that the constant and varied exposure to disinformation—what some described as an “oversupply” of information—not only aims to make people believe falsehoods but also leads them to **lose trust in any information altogether**. This confusion weakens people’s sense of security and contributes to social anxiety, psychological stress, and instability (Interviews 3, 10, 11, 14).

This phenomenon aligns with broader research findings. Sadiq Muhammed T. and Saji K. Mathew (2022) explain that hyper-saturation of information, combined with other societal stressors such as political crises, can diminish public trust and **increase social vulnerability to manipulation** by heightening collective uncertainty and emotional sensitivity.

2. Declining Public Trust in the Media: Another prominent manifestation of disinformation’s impact in Mongolia is the erosion of public trust in media organizations (Interviews 2, 3, 4, 5, 6, 11, 13). According to the International Republican Institute (IRI, 2024), Mongolians’ overall attitudes toward the media remain relatively positive compared to other institutions, with 55% expressing favorable views. However, a majority (56.1%) believe that the media lacks independence and freedom in reporting issues objectively. Compared with 2022 results, this marks a noticeable decline in perceptions of media impartiality and credibility.

Figure 11. Public Perceptions of the Media among Citizens Who Consider Disinformation a Serious Problem, 2021 and 2024



IRI, Public Opinion Surveys, 2022, 2024

While such decline in media independence is certainly affected by structural challenges in media sector, spread of disinformation can accelerate or add to this trend. Interview participants noted that trust is particularly weak toward online news portals, typically small outlets with only one to three staff members and no clear editorial policy, and toward privately owned traditional media organizations (Interviews 1, 3, 4, 11, 13). As of 2024, there were 389 active media outlets in Mongolia, 42% of which were online sites, and 73% privately owned (PressInstitute, 2025).

The business model of online media—driven by social media algorithms that prioritize high-engagement content, has encouraged journalists to use emotionally charged tones and, in some cases, to frame stories from biased perspectives to attract audience attention. This practice has significantly undermined public confidence in the neutrality and professionalism of journalism. The Mongolian Union of Journalists 2025/6) publicly warned media professionals about this growing tendency in its recent statement.

Moreover, interview participants highlighted that the decline in journalistic ethics and professionalism, the rise of paid content and contractual arrangements, and even instances where journalists themselves circulate false information, have all damaged the reputation of the media sector and weakened public trust (Interviews 3, 4, 6, 13).

3. Declining Public Trust in Government and State Institutions: Politically driven disinformation directly targets pillars of trust of democratic systems—focusing on the government, politicians, political parties, and state institutions. While critical scrutiny of government performance is essential in any democracy, interview participants cautioned that when public trust in the state and its institutions declines systemically, it can destabilize the foundations of democracy over the long term (Interviews 3, 7, 9, 10, 11, 13).

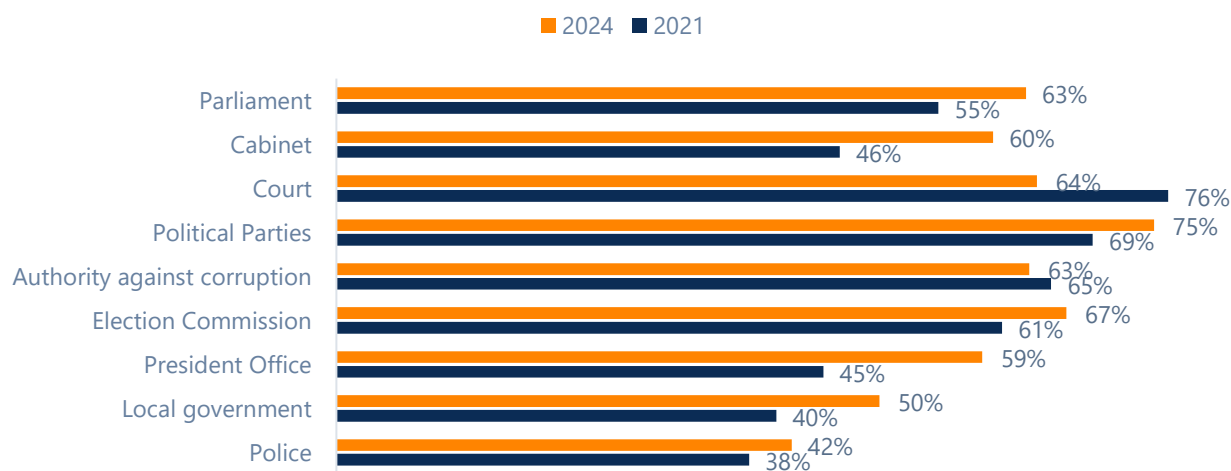
Some participants noted that disinformation aimed at the judiciary has been especially damaging to public perceptions of state integrity. In recent years, organized disinformation narratives have circulated widely, portraying judges and lawyers as “corrupt,” “bought,” or “incapable of delivering fair judgments.” Some interviewees even observed instances where such narratives appeared to have been strategically amplified or coordinated at higher levels of government (Interviews 7, 9).

“The attacks aimed at undermining trust in the judiciary resemble a coordinated campaign — they follow a recognizable pattern. When disinformation focuses on a concrete case that directly touches on human rights (for example, as in the Noorog case), people think, ‘This could happen to me too,’ and respond by actively defending their rights. However, when the narratives about the judiciary become vague, unsubstantiated, and difficult to disprove, citizens no longer know what exactly to react to. They are left with a general sense that ‘something is wrong.’ Over time, this atmosphere corrodes public trust and the core values of democracy, gradually weakening the very foundations of institutions.”

Excerpt from Interview

These qualitative observations are supported by quantitative public opinion data. According to the IRI’s 2024 survey, the institutions with the most negative public perceptions were political parties (75%), the General Election Commission (67%), and the judiciary (64%) (see Figure 12).

Figure 12. Negative Public Attitudes toward State Institutions among Citizens Who View Disinformation as a Serious Problem, 2021–2024



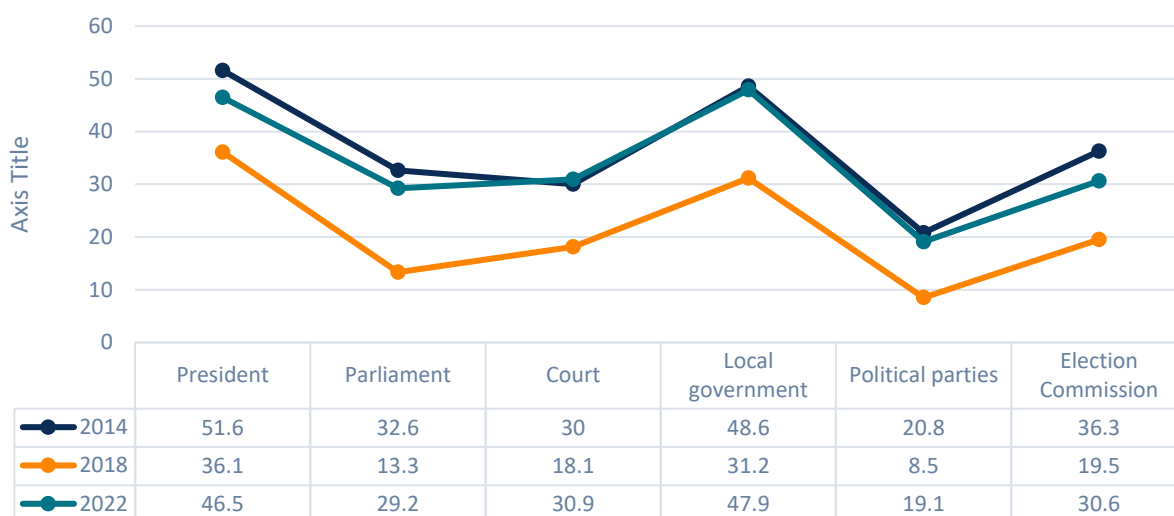
Source: IRI, Public Opinion Surveys, 2021, 2024

Similar trends are reflected in other national surveys measuring trust in political and state institutions. While the *PolitBarometer* conducted annually by Sant Maral Foundation reports relatively higher trust scores, it also shows significant fluctuations over time. The Asian Barometer Survey, conducted every four years, indicates that levels of trust have remained relatively stable over the past eight years. By contrast, the Social Well-being Survey of Mongolians, conducted every five years, reveals a gradual long-term decline in trust in the government.

Overall, while short-term fluctuations in trust appear to reflect changing political and economic conditions, the long-term trend points toward a steady decline. This may also indicate that citizens have

become more sensitive and demanding regarding government performance, accountability, and transparency.

Figure 13. Levels of Trust in Government Institutions



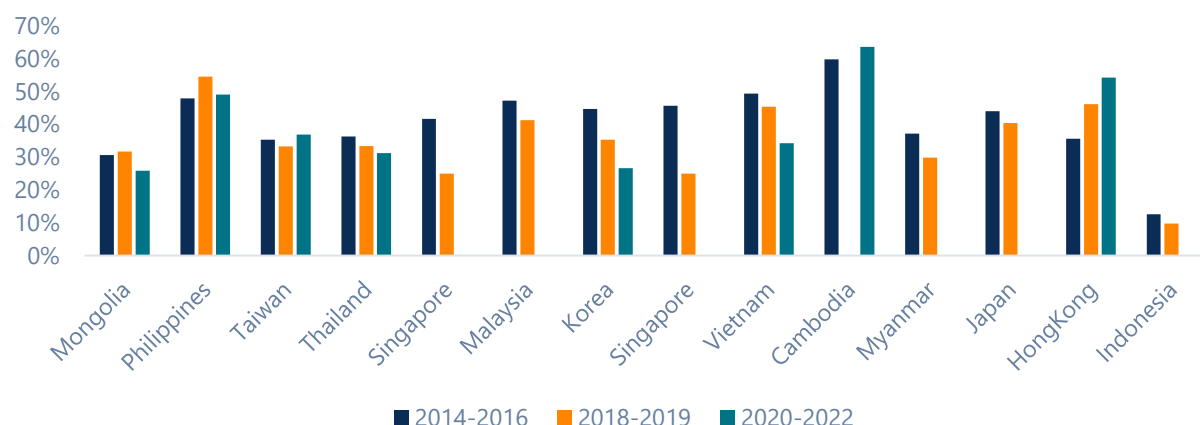
Source: Asian Barometer Survey, 2014–2022

4. Disinformation as a Driver of Social Division and Polarization: Interview participants consistently emphasized that disinformation in the digital space has become a major driver of social polarization in Mongolia. The topics where such divisions appear most visibly include environmental issues (renewable energy transition, coal-fired power plants), mining (licensing and extraction social and environmental impacts), health (vaccine controversies), human rights (the death penalty debate), and religion (controversies surrounding the 10th Bogd) (Interviews 2, 7, 8, 10, 13).

Some interviewees (Interviews 10, 13) noted that these debates are often not the result of genuine ideological differences, but rather appear to be deliberately provoked, emotionally charged, and frequently amplified by troll accounts. Some also observed that polarization tends to intensify during politically sensitive periods—such as elections or parliamentary budget discussions—suggesting that it may at times serve as a deliberate distraction tactic (Interview 7).

Quantitative data further corroborates these observations. According to the Asian Barometer Survey (2014–2022), approximately one in three Mongolians reported experiencing political polarization. While this places Mongolia at a moderate level compared to other Asian countries—neither severely fragmented nor entirely cohesive—it nonetheless reflects a visible degree of division in society.

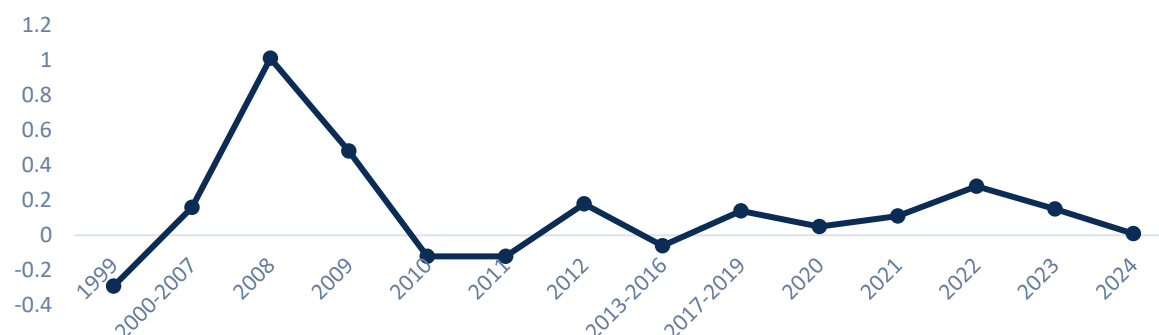
Figure 14. Share of citizens who agree that “it is difficult to communicate or get along with friends or colleagues who hold different political views”



Source: Asian Barometer Survey, 2014–2022

Similarly, the V-Dem Political Polarization Index places Mongolia’s score at 0.01 on a 0–4 scale—indicating a moderate level of polarization, with a slight upward trend observed over the long term from 1999 to 2024.

Figure 15. Political Polarization in Mongolia, 1999–2024



Source: V-DEM data

Historical patterns show that polarization peaked in 2008–2009, during the protests following parliamentary election results. Subsequent surges were observed during the 2012 elections and again in 2020–2022, coinciding with the COVID-19 pandemic. The combination of psychological strain, uncertainty, and emotional reactions deepened social fragmentation during this period (Tergel.B, 2021). Overall, these findings suggest that political polarization in Mongolia tends to intensify during major national events, such as elections or large-scale political and social crises, when disinformation circulates most actively.

At the international level, similar patterns have been identified. A configurational analysis of data from 177 countries (Vasist PN, Chatterjee D, Krishnan S., 2023) confirmed that:

- Disinformation emerged as a significant explanatory factor in every model analyzing political polarization;
- Hostile rhetoric by political leaders and the use of hate speech in parliamentary debates further aggravated divisions; and
- Increased government control, censorship, and social media monitoring were found to intensify polarization rather than mitigate it.

These findings position disinformation not merely as a symptom of political polarization, but as a core mechanism that actively reproduces and deepens societal divisions, both in Mongolia and globally.

5. Disinformation and Its Impact on Freedom of Expression: While policies and actions to combat disinformation are undeniably necessary in a democratic society, they also carry the risk of restricting freedom of expression. In this sense, the two can be seen as *two sides of the same coin* (Colomina, C.; Sánchez Margalef, H.; Youngs, R., 2021).

Over the past decade, the most alarming decline in global democratic standards has occurred in freedom of expression. By 2024, this deterioration had reached an unprecedented level – 44 countries recorded a decline, up from 35 countries the previous year. In particular, press freedom, journalists' safety, citizens' ability to discuss political issues openly, and cultural and academic expressions have all worsened (Marina Nord, David Altman, Fabio Angiolillo, Tiago Fernandes, Ana Good God, Staffan I. Lindberg., 2025).

In Mongolia, the 2025 *World Press Freedom Index* ranked the country 102nd out of 180 nations, placing it in the "difficult situation" category (RSF, 2025). Among sub-indicators, journalist safety scored the lowest. Correspondingly, V-Dem's Freedom of Expression Index declined to 0.69 in 2024, down from 0.9 eight years earlier, showing a steady downward trend (V-Dem, 2016-2024). One of the primary drivers of this decline is the increasing harassment and pressure on journalists.

Qualitative findings from this study also reveal that the space for free expression in Mongolia is narrowing. Both citizens and journalists now face greater risks of being investigated, sanctioned, or intimidated under accusations of "*spreading false information*." Several participants emphasized that this situation has enabled certain state officials to exploit legal mechanisms for their own benefit (Interviews 5, 7, 9, 12).

Specifically, most cases filed against journalists for "*disseminating false information*" have been initiated by high-ranking public officials, members of parliament, or government agencies (NHCR, 2024). Moreover, Article 13.14 of the Criminal Code ("*Spreading False Information*") is overly broad and ambiguous, allowing it to be used not only as a judicial tool but also as a means of harassment and intimidation (Interview 7).

As a result, state measures taken in the name of combating disinformation risk having the opposite effect, seriously restricting press freedom and citizens' right to free expression. This underscores the need for carefully balanced rights-based approaches to addressing disinformation in democratic societies.

In addition to the impacts discussed above, the research identified several potential effects of disinformation that – although not yet empirically confirmed or systematically studied—were repeatedly mentioned across expert interviews. These topics remain data-scarce and under-researched but warrant closer attention in future studies.

(1) Influence of Disinformation on Policy and Decision-Making: According to experts interviewed, deliberately disseminated disinformation on social media has begun to exert tangible influence on public policy and government decision-making. Participants cited cases where false or exaggerated information about specific issues generated strong negative or overly positive reactions online, which in turn affected whether certain government decisions were approved, delayed, or reversed (Interviews 1, 9, 15).

This dynamic increases the risk that public policy becomes skewed toward populist directions, aligning with public sentiment rather than evidence-based reasoning. It also opens the possibility that decision-makers may respond to manipulated public opinion rather than to objective analysis. Some interviewees further noted instances where state institutions themselves appeared to orchestrate or amplify disinformation, using it strategically to test public reaction or to prepare the ground for upcoming policy decisions (Interviews 2, 3, 4).

While these claims are difficult to verify through existing evidence, they point to the urgent need for in-depth case studies examining how disinformation may influence policy formulation, judicial decisions, legal amendments, and digital monitoring practices in Mongolia.

(2) Potential Impact on Electoral Outcomes: Politically motivated disinformation typically intensifies in the year leading up to elections, with the ultimate goal of influencing electoral outcomes. International research shows that such disinformation campaigns tend to have the strongest impact on groups that are less informed, politically disengaged or inconsistent in their values, or conversely, highly polarized in their beliefs.

Future studies should analyze patterns of electoral disinformation in Mongolia and assess how different social groups' political decisions are shaped by such campaigns. These findings would help design targeted counter-disinformation initiatives and voter education programs during election periods.

(3) Risk of an Information Crisis (Infoclypse): The rapid advancement of technology—particularly synthetic media (deepfakes) and AI-driven content algorithms—is making it easier to produce and distribute disinformation tailored to individual users' preferences and ideological profiles. As illustrated by the Cambridge Analytica case, this process can lead to extreme segmentation of the information environment and enable the weaponization of disinformation for strategic manipulation.

The growing sophistication of AI-generated content means that even digitally literate citizens may soon find it difficult to distinguish between authentic and fabricated information. This poses a serious risk of an emerging "information crisis" (infoclypse)—a state in which the very foundations of public trust and shared reality collapse (Interviews 1, 3).

Researcher B. Tergel (2021) noted that a similar phenomenon briefly occurred in Mongolia during the COVID-19 pandemic, when misinformation surged amid uncertainty and psychological stress. Experts warn that such conditions could reoccur or intensify as digital technologies evolve and information manipulation techniques become more advanced.

2.2. Impact of Disinformation at the Individual Level:

False arguments and disinformation not only undermine the integrity of governance systems but also exert profound and multifaceted negative impacts on people's daily lives (Marta Pérez-Escolar, Darren Lilleker, Alejandro Tapia-Frade, 2023). Therefore, in this section, we further examined how disinformation affects individuals and identifies the personal characteristics that make some social groups more vulnerable than others.

1. **Cognitive biases** - cognitive bias/distortions, false perceptions and flawed beliefs, as the primary way disinformation affects individuals:
 - **Misperceptions and Distorted beliefs:** Among all the observed effects, respondents most frequently highlighted cognitive bias, misperceptions and flawed beliefs, as the primary way

disinformation affects individuals. Particularly among groups with limited information access or certain cognitive profiles, disinformation is often perceived and internalized as *fact* (Interviews #6,7,8,9,13). These distortions manifest through several psychological mechanisms:

- **Ineffective correction/Resistance to correction:** Participants repeatedly emphasized that factual corrections rarely match the reach or impact of the original falsehood. As several noted, “corrections never travel as far as lies” (Interview #7,13). According to a cognitive Psychologist Eryn J Newman (2022), false information can *form false beliefs*, cause individuals to *remember false claims as true*, and make it difficult for the brain to update memory or revise entrenched beliefs even after corrections. The strength of this “continued effect” depends largely on a person’s cognitive disposition, once a false belief is encoded in memory, it can unconsciously influence future judgments and decisions. For instance, Namsrai (2024) found that many young voters abstained from participating in the 2021 and 2024 elections due to the persistent belief, shaped by online disinformation that “voting makes no difference” or that “election results are predetermined.”
 - **Motivated reasoning:** Individuals tend to selectively interpret information to protect their preexisting beliefs, even when those beliefs conflict with verified facts. This phenomenon, known as *motivated reasoning* (GaLeotti, 2020), explains why people sometimes disregard or reinterpret factual corrections, they unconsciously use disinformation to confirm what they already believe.
 - **Filter bubble and Echo-chamber effects:** Some experts noted that the phenomenon of algorithm-driven information isolation, commonly known as the *filter bubble*, is becoming increasingly prevalent in Mongolia (Interviews #8,9). Social media algorithms prioritize showing users content similar to what they previously engaged with. This “engagement-driven approach” results in individuals being exposed mainly to information and communities that reinforce their existing views. As Marma (2025) explains, such personalized filtering gradually evolves into an *echo chamber* – a closed communicative environment where like-minded opinions circulate, amplifying one another. Those immersed in such echo chambers tend to avoid or reject opposing viewpoints, defend their own beliefs more rigidly, and sometimes consider even false but emotionally appealing content as “partly true” (GaLeotti, 2020). Thus, cognitive biases formed at the individual level serve as a foundation for broader social polarization and fragmentation.
2. **Information fatigue and Declining trust:** Another major individual-level impact observed in this study is information fatigue, a loss of trust caused by persistent and repetitive exposure to disinformation, particularly in political contexts (Interviews #2,5,6,10,15). Rather than persuading people to believe in a specific falsehood, continuous waves of misleading information erode trust in *any* information or source. Edson C. Tandoc et al. Kim (2022) describe this phenomenon as *analysis paralysis*, a cognitive overload that impairs people’s ability to critically assess information. In such circumstances, individuals tend to passively consume information or deliberately avoid it altogether, a behavior known as *information avoidance*. Studies during the COVID-19 pandemic (Qing Huang, Sihan Lei, 2022) also confirmed that information overload reduces trust in credible sources and increases the likelihood that people rely on simpler, emotionally charged narratives, making them more susceptible to disinformation.

3. **Emotional and Psychological Effects:** Disinformation has also been shown to significantly affect the emotional well-being and psychological stability of citizens. According to interview participants, false and manipulative information has amplified feelings of stress, frustration, fear, and anxiety among Mongolians, contributing to growing emotional volatility (Interviews #2,10,11). This emotional instability can weaken citizens' ability to monitor government decisions and policies; on the other hand, it creates a favorable condition for influencing decision-making amid public psychological instability (Interviews #10, 11).

Empirical evidence supports these observations. The OptimalNMax (2024) study found that disinformation framed in fear-inducing or anxiety-provoking tones tends to be shared more frequently among Mongolians, while individuals with depressive or blame-oriented tendencies were more likely to disseminate false content.

International studies show similar results: disinformation contributes to increased stress, depression, fear, and insomnia (Alfred Nela, Etion Parruca, 2022; Claudia, 2022), and has measurable adverse effects on mental health (MahekVhora, 2023). Moreover, research by Baeta Gavurova et al. (2024) revealed a correlation between life quality indicators, such as *life enjoyment* and *sense of meaning*, and disinformation-related behaviors. Individuals who actively spread disinformation tend to report lower life satisfaction and meaning, suggesting an emotional or existential link between disinformation engagement and subjective well-being. In Mongolia, similar tendencies have been observed. According to IRI's Public Opinion survey (2024), 74% of Mongolians stated that they would prefer to move abroad for an extended period if given the opportunity. Experts interpret this as a sign of declining optimism and diminished confidence in the country's future (Interviews #6, 10, 15).

Vulnerability to disinformation. As discussed earlier, disinformation not only affects people's cognition and emotions but also interacts closely with their psychological traits, social characteristics, and information-processing tendencies. Psychologists have emphasized that an individual's cognitive and emotional profile directly shapes their susceptibility to false information (OptimalNMax, 2024), while sociologists point to the roles of social, economic, and demographic factors (MMCG, 2021). So, what types of individuals are most vulnerable to disinformation in Mongolia?

According to the 2024 study by the OptimalNMax psychology team, individuals who tend to believe and share politically related disinformation often exhibit a common "victim mentality", a psychological tendency to attribute personal problems or misfortunes to external causes rather than internal factors. This outlook makes them more receptive to emotionally charged content that appears to validate their frustrations (OptimalNMax, 2024).

Other common traits include low critical thinking ability, cognitive distortions in reasoning, tendencies toward suspicion, hostility, and quick judgment, and a propensity to amplify external blame. These characteristics make individuals more likely to internalize and spread false information.

From a socioeconomic and demographic perspective, disinformation tends to have a stronger influence on:

- Adolescents, young adults with limited media literacy, critical thinking, older adults (ages 55–69) with limited digital literacy and low ability to distinguish real from manipulated content;
- Unemployed, herder, and agricultural sector workers;
- Individuals living in rural areas with limited access to diverse information sources; and
- Low-income and less-educated populations (OptimalNMax, 2024). (OptimalNMax, 2024).

Similarly, adolescents and young adults (ages 18–25) are highly exposed and emotionally responsive to disinformation due to heavy, often uncritical, social media use. Many young people spend significant time online but tend to skim headlines rather than read full content, and their engagement often stems from boredom, imitation, or social conformity rather than verification of facts.

Table 3. Factors Increasing or Reducing Vulnerability to Disinformation

Group	Key Traits Increasing Vulnerability	Additional Risk Factors
Older Adults (55–69 years)	<ul style="list-style-type: none"> • Difficulty distinguishing between real and fake photos, videos, and multimedia content • Low awareness of how disinformation is created and spread online • Limited digital literacy 	<ul style="list-style-type: none"> • Employment: Unemployed, herders, or agricultural workers • Education: Low educational attainment • Location: Rural residence • Income: Monthly income ≤ 1 million MNT • Psychological: Victim mentality, tendency to blame others • Digital skills: Weak or outdated
Adolescents and Young Adults (18–25 years)	<ul style="list-style-type: none"> • Sharp increase in unsupervised social media use during and after the pandemic • Spend long hours online but have limited ability to evaluate sources critically • Read only headlines without checking full content • Abundant free time and exposure to high information volume • Actively influenced by peers, imitation, and boredom • Limited subject-matter knowledge on key issues 	

Source: (OptimalNMax, 2024), (MMCG, 2021)

Based on these psychological, social, and demographic traits, the study attempted to estimate the size of Mongolia’s most vulnerable population segment. Using data from the 2020 Population and Housing Census, and intersecting socio-demographic variables such as age, employment status, education level, and place of residence, it was estimated that approximately 7.3% of the total population falls into the highly vulnerable group most susceptible to disinformation.

Table 4. Estimated Size of the Population Most Vulnerable to Disinformation

(1) Age	N	Employment status	N	(3) Education Level	N	(4) Place of Residence	Population Segment
18-25 years	39,016	Unemployed	24,562	Upper secondary or below	19,845	Rural areas	10,901
18-25 years		Unemployed		Upper secondary or below		Ulaanbaatar city	8,943
18-25 years		Herder	2228	Upper secondary or below	1896	Rural areas	1830
18-25 years		Herder		Upper secondary or below		Ulaanbaatar city	23
65-69 years	5,510	Unemployed / Retired	4551	Upper secondary or below	2589	Rural areas	1554
65-69 years		Unemployed / Retired		Upper secondary or below		Ulaanbaatar city	989
Total							24,240

Source: Calculations based on data from the 2020 Population and Housing Census of Mongolia.

The next step in refining this estimation involves incorporating additional indicators such as (1) digital literacy, (2) media literacy, and (3) psychological profiles of citizens. Since there are currently no comprehensive national datasets that measure these variables across the population, such indicators could be included as screening questions in future targeted surveys.

3. Current Measures and Responses

Disinformation in Mongolia perceived to be a pressing issue, as 85% of people identified misleading and false information as problematic in the recent IRI poll (2024) – a slightly lower percentage than 2022 results. V-Dem indicators also show a slight decline in false information trends in Mongolia since 2022, which can be related to COVID-19 (V-Dem, 2025). Interview participants expressed somewhat contrasting views, while some (Interviews 5, 6, 11) believe that indeed disinformation has increased significantly over the years, while others (Interviews 2, 7, 14) argue that disinformation itself was always there, only its speed and reach has increased due to recent technological advancements (see Section 2).

Despite the overwhelming concern among public on the challenges of disinformation in Mongolia and experts' concern over increasing and harming trend of disinformation, the scope of policies and other actions countering disinformation remain limited. Here, we aim to map relevant efforts taken by government and other actors to counter disinformation directly or indirectly.

3.1. Legal and policy interventions to counter disinformation

Countering disinformation requires legal and policy action with a holistic approach and multi-stakeholder engagement. However, in many countries the government response remained limited and often ad hoc (Matasick et. al., 2020). The situation in Mongolia is similar, as government's policy and regulatory initiatives to counter disinformation is limited, non-systematic, and vague. Some interview participants recognized (Interview#13) that there is no specific policy or regulation that is directly aimed to counter disinformation, while others highlight certain initiatives by the government rather than a comprehensive framework or policy, such as digital literacy initiatives (Interview #2), penalization and criminalization of disinformation (Interviews 6, 7 11), moderation of illegal or infringing content (Interviews 10, 12). Yet, such efforts are not synchronized, misaligned and insufficiently implemented.

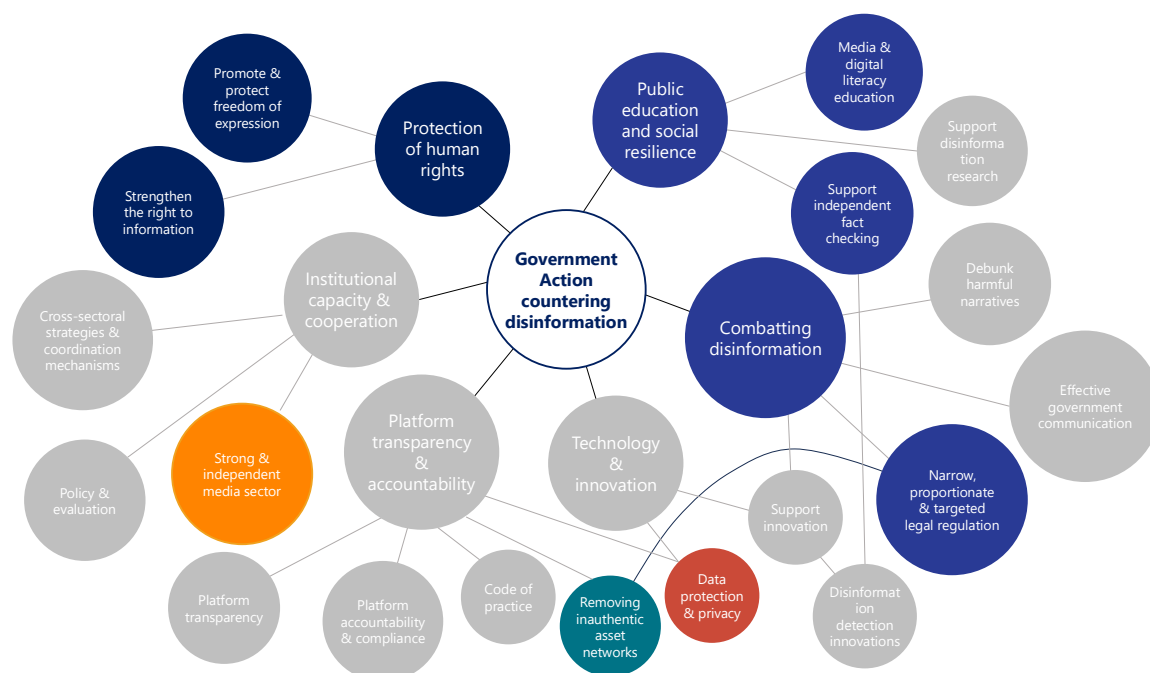
International organizations such as UN, OECD and EC recommends holistic approach in countering disinformation. Our team, using UN Secretary-General's 2022 report and the Countering Disinformation portal, OECD's recent reports and policy briefs, the OECD good-practice principles for public communication, and the European Commission's 2018 communication on tackling online disinformation as the principal sources, has mapped out following framework of recommended actions for countering disinformation effectively.

Figure 16. Framework of recommended action for countering disinformation, illustration by the study team



As the above framework of recommended actions for countering disinformation is generic, some categories of action are not completely suitable or feasible in Mongolian context. For example, most digital platforms used by Mongolians are those of global tech giants – Meta, X, YouTube, Tik Tok, etc. – and currently no regulation charges such platforms with any responsibility. Nevertheless, Mongolia's current response to disinformation is short of holistic and cross-sectoral, contrary it is non-systematic, fragmented, highly limited and unfocused.

Figure 17. Mapping of existing efforts to counter disinformation in Mongolia



Criminalization of disinformation

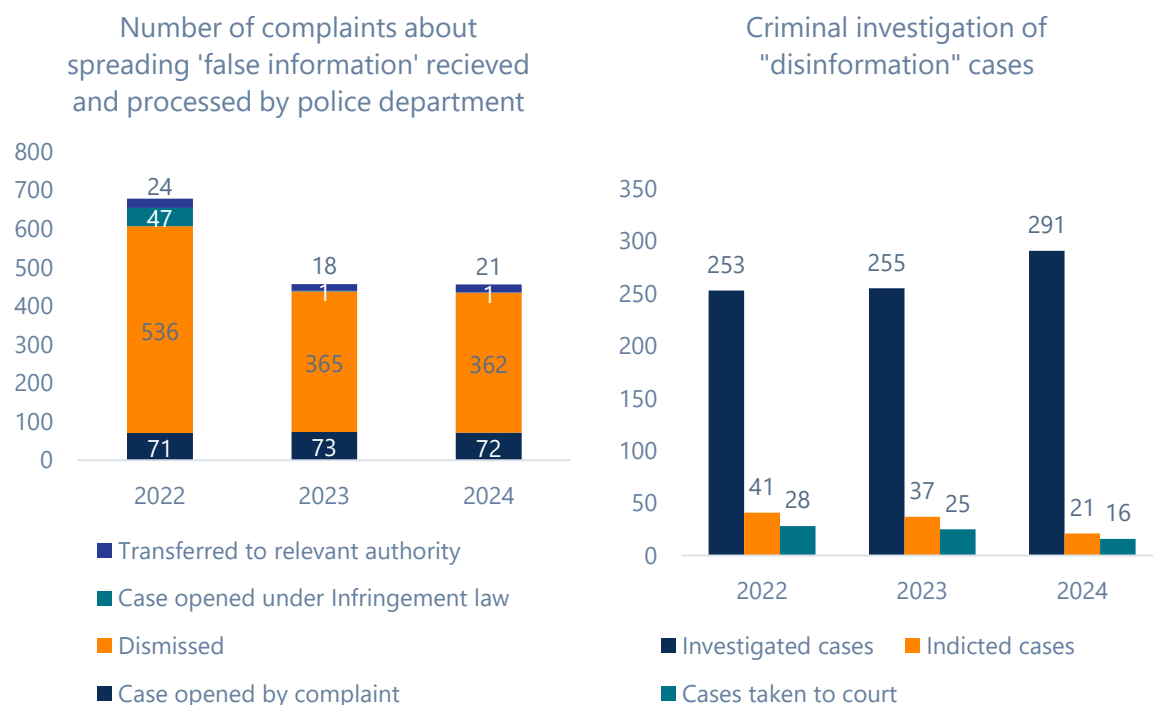
One of the most infamous legal actions to counter disinformation is the criminalization of disinformation. The United Nations resolutions General Assembly resolution A/RES/76/227 (2021) and Human Rights Council resolutions A/HRC/RES/49/21 (2022) and A/HRC/RES/55/10 (2024) stressed the concern over vague and overly broad laws criminalizing disinformation which can be used as a pretext to restrict the enjoyment and realization of human rights or to justify censorship.

Parliament adopted amendments to the Criminal Code on 10th of January 2020 that introduced Article 13.14. This article criminalizes disseminating “obviously false information” that damages a person’s honor, dignity or a legal entity’s reputation.

Prior amendment to the Criminal Code in 2017 has introduced the criminalization of disinformation during elections. Both articles protect honor, dignity and reputation of individuals and legal entities, parties and candidates in latter case, from disinformation. In overall, both articles resemble criminalization of defamation and/or slandering, which was previously removed from the Criminal Code of Mongolia following the UN recommendation in 2015 (OSF, 2021).

According to the last three years’ statistics, police department receives on average 543 complaints of disinformation annually, from which 72 (13.3%) cases opened for investigation and 421 (77.5%) complaints are dismissed. Meanwhile, 266 criminal cases are investigated annually under Article 13.14 each year by the police and on average 33 indictments are made per year. According to the criminal court’s open data, total of 133 criminal cases was sentenced by the article 13.14 since 2020.

Figure 18. Number of complaints received and processed by police, and investigation statistics of “disinformation” cases



Though Article 13.14 has been in force for over 5 years, there are still concerns and challenges in its implementation. From legal perspective, Article 13.14 is criticized for being "too broadly legalized", incorporating traditional notions of slander and insult, as well as for its focus on the "objective aspect"

of false information while obscuring the "subjective aspect" or intent to harm. This means that spreading false information, even without the explicit intent to defame, can lead to criminal liability. Such wide reaching and vague definition of disinformation crime puts journalists at risk of criminal records, lengthy investigations, and pressure to disclose confidential sources, which directly conflict with journalistic ethics and impedes investigative journalism.

From operational perspective, actors in justice sector – courts, prosecutors, police department and lawyers – who are mainly involved in implementing Article 13.14 need to enhance their knowledge and understanding of human rights, freedom of expression and disinformation to ensure that investigation and court hearing of criminal cases on disinformation does not impede freedom of expression.

Despite such criticism and concern, interview participants generally agree that article 13.14 of the Criminal Code should be kept, suggesting some amendments can be made to safeguard its negative effect on freedom of speech and media freedom. Article 13.14 protects ordinary people from online slandering, hateful content and other violations. Though participants point out the necessity to narrow its definitions and scope to reduce its impact on freedom of expression and press freedom. On the contrary, lawyers argue that the defamation cases to be ruled by Civil Code and Article 13.14 should be abolished from the Criminal Code (OSF, 2021).

Recently on November 25, 2025, the Constitutional Court of Mongolia ruled that the Article 13.14 violates the Constitution of Mongolia. Details of the ruling has not been published and the court ruling is expected to be discussed by parliament.

In overall, the criminalization of "spreading false information" (Article 13.14) is perceived as a major barrier to freedom of expression, leading to a noticeable decline in press freedom in Mongolia, reaching a historical low in recent years. Experts advocate for the removal of Article 13.14 from the Criminal Code, or at minimum, a careful drafting of such laws to avoid stifling freedom of expression. They also stress the need for clear definitions, reduced bureaucratic response times, and robust protection for confidential sources.

Penalization of disinformation in infringement law

Before the criminal amendment, defamation and the spread of false information were regulated under Article 6.21 of the Infringement law from 2017 until the article was repealed in 2020, when the amendment to the Criminal code introduced the criminalization of disinformation. After the introduction of defamation regulation in the Infringement Law over 100 journalists were charged under this provision in its first months, mainly in cases filed by politicians¹.

Even though the defamation regulation was repealed in 2020, during the early COVID-19 pandemic, emergency regulations – Law on Disaster Prevention, Covid-19 Law, and Covid-19 disinformation prevention regulation – introduced fines for spreading false news about Covid-19 and disaster situation in general. Accordingly, article 5.13 of the Infringement Law was amended prohibiting public distribution of false information about natural disasters, disease outbreaks, etc. to mislead public. Just in 2020, 1790 offences were committed, and 1480 individuals and legal entities were charged with Article 5.13 (OSF, 2021).

¹ <https://www.transparency.org/en/press/mongolia-criminalisation-of-defamation-is-another-disturbing-attack-on-media-freedom-threatening-anti-corruption-efforts>

Apart from penalizing distribution of false information, emergency regulations allowed government agencies to take actions to stop the spread of disinformation on media and social media – Article 10.4.13 of Law on Disaster Prevention – however failed to provide clear scope and principles of such actions. Meanwhile, the Article 9.13 of the COVID-19 Law authorized the National Police Agency to “regulate online environment” for the purpose of countering COVID-19 related disinformation online.

In overall, the Media Freedom Report 2020 notes that emergency amendments intended to counter disinformation during the pandemic were misused against citizens and that the lack of a narrow definition of “false information” allows arbitrary enforcement (GIC, 2021).

Removing inauthentic asset networks

As presented in chapter one, most harmful and wide-reaching disinformation is organized and distributed using troll networks and other inauthentic network assets, such as fake accounts, groups and pages without proper information or identity. Therefore, detection and removal from platforms of accounts or pages that misrepresent themselves has obvious merit (Bateman and Jackson, 2024). However, Bateman and Jackson (2024) argue that effectiveness of detection and removal of inauthentic network assets is difficult to assess.

Disabling or limiting some actors, who enable information manipulation campaigns, promote and disseminate disinformation, can impose cost and barriers on perpetrators, while it may not be the efficient strategy to counter disinformation.

In this regard, the Communications Regulatory Commission (CRC) of Mongolia conduct or involved in digital content moderation. The CRC ensures that the digital content is compliant to various legal frameworks, including national security doctrine, election laws, child protection laws, criminal law, crime prevention law, intellectual property protection law, and others.

As part of the digital content moderation mandate, the commission undertakes efforts to remove inauthentic asset networks. Primary effort in online content moderation and essentially on removing inauthentic asset networks is the commission’s cooperation with Facebook through a Government Case Work Channel, known as ‘green channel’, since 2019. While the green channel is to restrict contents violating relevant laws of Mongolia or non-compliant to Meta’s community standards, it includes removal of false information, fake accounts and accounts violating Mongolian laws.

From operational perspective, the commission does not decide whether the content or the user violated relevant Mongolian laws. Relevant authorities, including police, prosecution, court, investigate and review complaints and cases with due process, and forward the decision remove content or restrict account to the CRC, which then processes such decisions and the final action to remove illegal content or inauthentic user rests with the platform – Facebook. No statistical or detail information on how many cases were processed under which regulation is available to review the efficiency and relevance of this action in countering disinformation.

Recently, e-Mongolia – online public service platform – added a function to “Request to close a website with violations” in March 2025. According to the information provided by the e-Mongolia Academy, from total of 2918 requests – which processed to relevant authorities for decision – recieved as of November 24, 2025, 439 request were related to disinformation and 1009 request related to fake facebook accounts.

3.2. Public education and social resilience

Media and digital literacy (MIL) education

Policy recommendations from international organizations highlight the importance of long-term structural reforms, including media literacy. (Bateman and Jackson, 2024) Virtually all interview participants approved the importance and long-term effectiveness of fostering digital and media literacy of public in reducing negative effects of disinformation.

Digital and media literacy remain to be an emerging topic in Mongolia, with little research evidence available. Media and information literacy (MIL) in Mongolia is not comprehensively measured through a single national index or dedicated study, rather it was included in broader digital literacy studies with limited scope. For example, a recent study determined that 43.8 percent of population possess information skills (Bayasgalan, 2023) citing a study of the National Statistical Office of Mongolia (2021). In this NSO's study (2021) on 'Sample Study of Information, Communication and Technology Use of Households and Individuals', information skills were defined by participants' ability to find information on goods and services (40.9%), access information on government agencies' websites (29%), save files in online environment (19.8%), copy and transfer data and information on digital spaces (16.9%).

Specifically on MIL, UNESCO has been another actor since 2018, actively working to integrate MIL into education system (UNESCO, 2025) through advocacy and capacity building. As part of this effort, the Press Institute of Mongolia, with a support by UNESCO, conducted workshops in 2024 on integrating MIL into pre-school, primary and secondary curricula and trained stakeholders on MIL (UNESCO, 2025). Previously, UNESCO, together with PIM, organized national stakeholder forums on MIL since 2019 (UNESCO, 2024) and established the National Network for MIL to promote the importance of MIL education (UNESCO, 2021).

Reportedly, according to our interview participants, media and information literacy initiatives were mostly implemented by civil society actors (Interview#2; Interview#5; Interview#6; Interview#8), where in some instances government agencies collaborated with civil society actors on media literacy public campaigns and actions (Interview#10). For instance, the Press Institute of Mongolia, the Nest Center, Mongolian Education Alliance, Faro Foundation Mongolia, organized MIL trainings and advocacy campaigns in collaboration with international actors.

Essentially, the GoM's approach is to promote information literacy through broader framework of digital literacy. The GoM approved a framework for public digital literacy in April 2024², which include three competency components related to data and information – to seek data and information, to use data and information and to process data and information. From these three competencies, the second competence covers knowledge and awareness on identifying false and true information and data in digital environment and using information ethically. Though, the GoM Resolution #141 commends the Minister of Digital Development, Communication and Innovation to organize public digital literacy trainings following the framework, our study did not record any relevant information on the implementation of this resolution.

UNDP and UNICEF are supporting the GoM's effort to build digital skills of the citizens (UN Mongolia, 2024). In 2024, as part of this program, school-based Digital Community Information Workers (DCIWs) initiative was implemented, successfully training and deploying 68 DCIWs and over 6,400 community

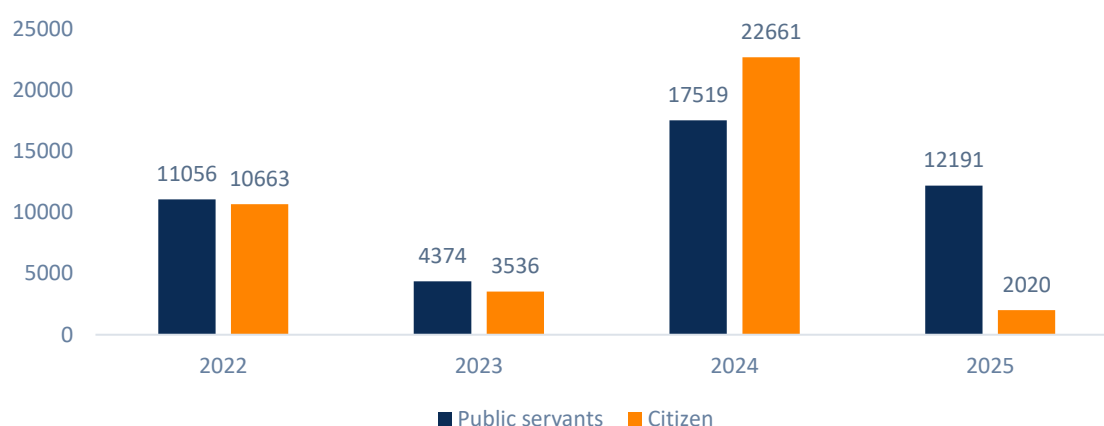
² <https://legalinfo.mn/mn/detail?lawid=17431761078932&type=3>

members, including teachers, students, and parents, received digital literacy training on e-Mongolia, e Kids, digital signatures, and online safety. However, the project is limited scope in focusing on one province as a pilot site.

Nevertheless, the project progress report suggests that the school-based digital community information worker model was proven to be effective. Interview participants of our study also recognized the need for media and digital literacy training to be incorporated into formal and informal education programs for sustainability, some recommending its inclusion in secondary education programs, while others suggested it to be included in lifelong education programs.

In our inquiry about the current status of integration of media literacy education in formal education curriculum, the Ministry of Education and Science claims that information literacy is covered and reflected in various subjects of formal education curriculum at all levels. For example, the primary education core program includes “information and technology skills” – choose information gathering method, gather information, process information and use information (MOES, 2014). However further comprehensive analysis and assessment of education curriculum is needed to determine the extent of media and information literacy inclusion in formal education.

Figure 19. Number of participants if digital literacy trainings from e-Mongolia Academy



Another effort to promote digital literacy is the trainings organized by the e-Mongolia Academy – a state enterprise operationalized in 2022. Since its inception, the academy has trained 41,140 public servants and 38,880 citizens through in-person and online training, according to the information provided by the academy. Extent of media and information literacy in the academy’s training program is not clearly reported yet.

Independent fact-checking

Fact checking considered to be one of the most common efforts to counter disinformation, debunk false narratives and promote social resilience to disinformation. A large body of research indicates that fact-checking can be an effective way to correct false beliefs about specific claims, especially for audiences that are not heavily invested in the partisan elements of the claims (Bateman and Jackson, 2024).

Mongolia’s fact-checking capacity rests on two independent fact-checking centers – the Nest Center’s Mongolian Fact-Checking Center (MFCC) established in 2020 and the Fact Check Mongolia (FCM) initiated in 2020. MFCC is the country’s only organization accredited by the International Fact Checking Network. The two fact-checking centers have reviewed and fact-checked 1618 disinformation in total.

Moreover, MFCC became a third-party fact-checking partner of Meta to combat the spread of disinformation on social media platforms.

In May 2024, the center partnered with the U.S. non-profit Meedan to launch **Asuu**, a Facebook Messenger tipline, powered by Meedan's Check software, that lets citizens send rumors or media items and receive verified explanations. The initiative was announced ahead of Mongolia's 2024 parliamentary elections to combat disinformation amid election cycle in Mongolia.

In parallel to the independent fact-checking initiatives, initiatives to establish government fact-checking centers are made by government officials and politicians. For example, in February 2025 the Minister of Digital Development, Innovation and Communication made a statement to establish a government fact-checking center during his press brief, which has received strong criticism. Experts also criticizing that the "fake-news" stamps (labels) are used by police and other organizations, who does not have and adhere to any fact-checking principles, practice and process. Such use of "fake news" labels, which should be reserved to independent professional fact-checking organizations adhering to fact-checking standards, principles, and practices, not helpful in combating disinformation, discrediting independent fact-checking practices and can potentially mislead public.

In relation to efficiency, fact-checking is often contested. Fact-checkers face a structural disadvantage in that false claims can be created more cheaply and disseminated more quickly than corrective information (Bateman and Jackson, 2024). In Mongolian context, funding and resource sustainability for extensive and sustainable fact-checking is limited on top of this structural disadvantage. Also, due to its organized and systemic nature disinformation or false contents reach far bigger audience while the fact-checking results do not. Furthermore, fact-checking, influencing factual beliefs, does not necessarily result in attitudinal or behavioral changes among individuals.

Nevertheless, fact-checking remains crucial action in combating disinformation, debunking persistent false narratives and helping change media and information behavior of individuals in long term.

3.3. Institutional capacity and cooperation

Media freedom and strengthening media sector

The rise of information technologies altered the landscape and media markets worldwide (Matasick et al., 2020) weakening the media sector integrity against rising information manipulation campaigns. This drastic disruptions in media sector affected "traditional media" and gave rise to new "digital" media in Mongolia, making it vulnerable to disinformation and information manipulation leading to further decline of public trust in media. (See chapter one) Consequently, strengthening media sector and its integrity is another fundamental structural measure to effectively counter rising disinformation (Bateman and Jackson, 2024).

Mongolia's media landscape reflects both pluralism and structural vulnerability. Mongolian Media Today (2025) Press Institute survey recorded 389 outlets. However, ownership concentration and political affiliations undermine editorial independence, as many outlets are controlled by business or political elites (Soon and Patel, 2022). Limited advertising revenue and a small market have made outlets financially fragile, forcing journalists into low wages and self-censorship (Freedom House, 2024). Despite constitutional guarantees of press freedom, the U.S. Department of State (2024) reported harassment of journalists, including police summonses and the use of criminal penalties for spreading "false information." Consequently, public trust in the media remains low, especially for print and online outlets, while state-owned broadcasters retain higher credibility (RSF, 2025).

In an effort to promote press freedom and strengthen media sector, in late 2024 the Ministry of Justice drafted a bill to replace the 1998 Press Freedom Law. However, the draft bill received a mixed response. Reporters Without Borders (RSF) welcomed the initiative but urged legislators to clarify the definition of journalism, guarantee media independence, strengthen source protection, promote self-regulation standards (e.g., the Journalism Trust Initiative) and increase transparency of media ownership and funding³. And UNESCO has encouraged the bill, concluding it as progressive comparing to the 1998 Press Freedom Law. On the contrary, civil society groups highlighted the need for further improvement of the bill.

Beyond legal framework reform initiatives, independent CSOs continue working to resolve structural challenges in Mongolian media sector, with the support of international development organizations – EU, USAID, DW Akademie, UNESCO and more. Among many organizations:

- **Globe International Center (GIC)**, with a mission to help the public to access information using all possible means of information and knowledge distribution such as traditional media, publications and new information and communication technology, conducts free expression monitoring, provides legal aid to journalists, analyses and advocates for media legal framework, and more.
- **Press Institute of Mongolia (PIM)** aims to support the development of independent and pluralistic media in Mongolia, to assist in improvement of qualifications and skills of Mongolian media workers, to analyze development of Mongolian media, and to advocate the role and importance of free media to the public. PIM delivers extensive training to journalists, conducts media research and monitoring, and conducts advocacy for media freedom and capacity building.
- **Media council of Mongolia (MCM)** is an independent regulatory body for print, broadcast and online media. Its goals include supporting media freedom, protecting media and journalists from censorship, establishing accountability of journalists and media organizations, developing ethics and professionalism, protecting journalists' independence and resolving professional/ethical conflicts. Apart from media development projects, the MCM is a primary independent organization handling complaints, conducting ethics oversight, supporting editorial independence and providing self-regulating support in Mongolian media sector. MCM has adopted a national ethics code, created a public complaints mechanism and by 2022 had handled 500 complaints (Mysorekar, 2022).
- **The Nest Center for Journalism Innovation and Development** focuses on strengthening press freedom by empowering media with sustainable business models—particularly niche and public-interest media. The Nest Center greatly contributes to Mongolia's counter disinformation effort through its Mongolian Fact Checking Center and advocacy campaigns against disinformation. It also provides innovation support in media, promotes technology and AI tools for media and promotes coalition and cooperation building media. The Nest Center established "Facts First Mongolia" Network to combat election-related misinformation and by June 2024 the network included 9 media outlets, 4 NGOs, a law firm and a fact-checking organization.

³ <https://rsf.org/en/mongolia-rsf-presents-its-recommendations-strengthen-ambitious-press-freedom-bill>

Such independent NGOs determined strengthen Mongolian independent media through media freedom, legal advocacy, media capacity building, journalist training, self-regulation and ethical standards, media certification, media content labeling principles and practices, innovation, public advocacy and education, and coalition building. These efforts are necessary and efficient elements in promoting independent, ethical and pluralistic media in Mongolia. Though fundamental structural challenges remain persistent. The changing media landscape and market challenges traditional business models for media outlets, threatening their sustainability, independence and capacity. In relation to this political and business ownership, influence on media remains high making them vulnerable to potentially coercive influence methods, such as “cooperation agreement” (known as “closure agreements”). Technological trend also gave rise to so-called digital media – small online based news agencies. According to PIM survey (2025), 148 such online news media operate – 94% operating on Facebook and 94% privately owned. Although some of these media outlets have strong editorial and ethical standards and capacity, many of them criticized to have no editorial policy and principles and falls beyond ethical and self-regulation efforts in media.

3.4. Protection and promotion of human rights

Information transparency and information security regulations

Lack of information – by creating a void of information – accelerate the proliferation of disinformation (Matasick et. al., 2020). Consequently, improved transparency and effective government communication is one of strategies to counter disinformation, as some respondents agree with (Interview #13).

In 2021, the parliament adopted a series of laws on information transparency and data protection – the Law on Public Information Transparency, the Law on Protection of Personal Information – marking a reform on government transparency. The new regulations improved information transparency and accessibility in overall, however certain gaps in the legal regulations are highlighted by experts (Interview#13). For example, the law authorizes heads of government agencies to determine the official secrets, which leaves a gap where information can be kept from public by being labeled as official secret.

3.5. Other attempts to regulate disinformation

Controversial social-media bill (2023). In January 2023 the State Great Hural passed a Law on Protecting Human Rights on Social Media that would have empowered authorities to remove social-media content and block users for broad reasons such as protecting national unity, state secrets or state symbols. The law also allowed the minister of internal affairs to shut down internet services and required posts about public officials to receive prior approval. Civil society organizations, including the Nest Center, condemned the bill’s rushed adoption and warned that it would give the government broad discretionary powers. President Khurelsukh vetoed the law; international organizations such as RSF and IFEX appealed to legislators to uphold the veto and draft rights-respecting alternatives.

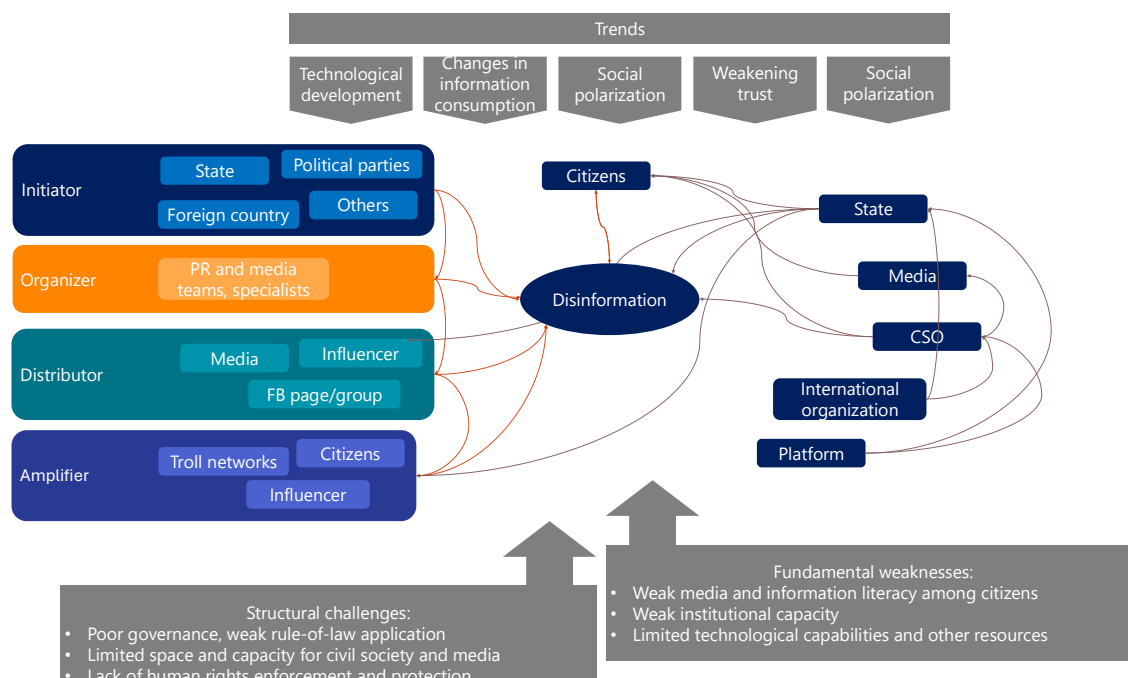
In overall, no dedicated policy and regulatory initiative to counter disinformation was identified, except the criminalization of disinformation and regulations against disinformation in election laws. And civil society and media respondents are expressed caution when it comes to government action against disinformation (Interview#4; Interview#6). Previous controversial initiatives of the government, including the Law on Protection of Human Rights on Social Media, the draft Law on Associations and Foundations, suggestion by the MDDCI to establish a government fact-checking center, led to caution among civil society, media and human rights activists. They believe that in current environments lacking a rule of law, politicians might be interested in restricting freedom of expression, press freedom on the pretext

of disinformation or insufficient implementation of poorly developed legal framework can harm fundamental freedoms and restrict press freedom.

4. Gaps and Challenges

Results of this mapping reveal number of trends (drivers), structural challenges and fundamental societal weaknesses that enable the spread and impact of disinformation, as well as critical gaps in national response efforts, all together hinder Mongolia's effort to combat disinformation effectively and consistently.

Figure 20. Disinformation landscape in Mongolia by the study team



Interviews and other sources suggest that combination of several **underlying trends** is driving current rise of disinformation and its effect on society. In the forefront of these trends is technological development and digitalization. Development and penetration of information communication technology have a breakneck pace. The NSO study on information, communication and technology consumption of households and individuals (2022) reveals that 84.3% of Mongolians use internet – 88.6% in cities and 72.6% in rural areas – and regularly with 84.3% of internet users using it daily. And the primary purpose of internet use is to access information (95%) – above 90% across all geographical locations. Another survey (MMCG, 2021) suggests that internet users spend on average 7 hours and 13 minutes daily on internet, suggesting not only regular but intensive internet use. Such rapidly growing and intensive connectedness of people made sharing and delivering information to large numbers of people easier and cheaper. Technological advancement also enables production of disinformation contents faster, cheaper and easier. Interview participants are particularly concerned with potential impact of GenAI, deepfake and other emerging tools on disinformation trends.

Secondly, information consumption behavior of people is rapidly changing. Rapid penetration of internet access and rise of social media platforms has changed media and information consumption of Mongolians. Reportedly total of 2.5 million social media users were registered in Mongolia, equating to 74.4% of population (Datareportal, 2025). Social media use is not only growing in terms of number of users but also in time spent on social media. MMCG study (2024) suggests that Mongolians spend on average 197 minutes daily on social media – 73 minutes more that spend watching television - from which 143 minutes on Facebook alone. Even though television is named as the primary source (73.6%) of information about politics internet is gaining pace as the second primary source (63.7%) of

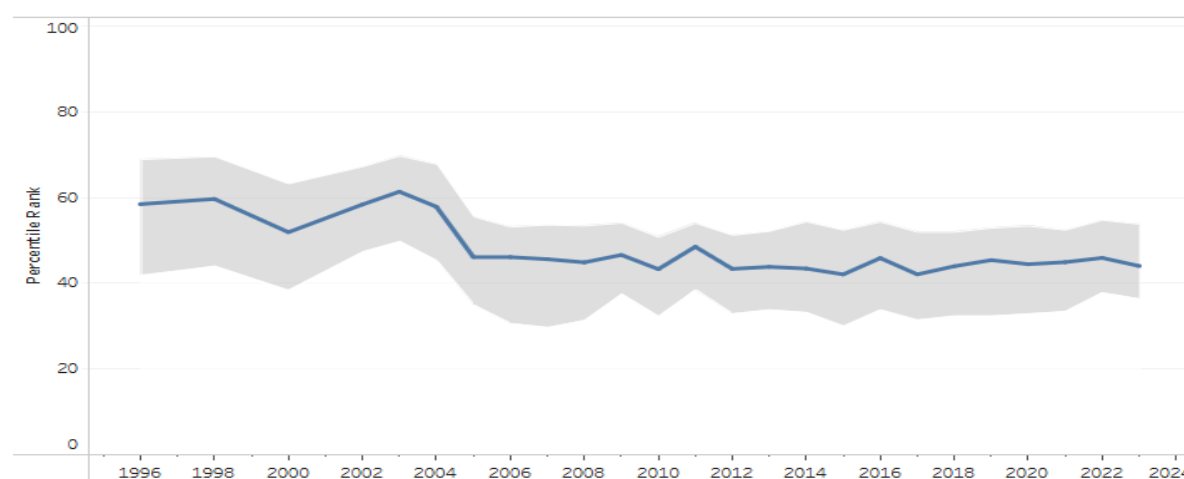
information (IRIM, 2023). In another survey, 50% named television as primary source of political news and information followed by 41% social media and 7% internet news websites (IRI, 2022). But all responses combined, virtually 100% of respondents use social media as an information source, 74% percent television and only 14% uses internet news sites (IRI, 2022).

Due to rapid digitalization and this rise of social media, media market is being disrupted, challenging conventional business models of media outlets. The digital shift is destabilizing Mongolia's already fragile media market. A 2025 Mongolian Media Today report by the Press Institute of Mongolia counted around 389 media outlets competing for a small advertising market. Many of these outlets are owned by politicians or business interests and operate as marketing tools rather than newsrooms, leading to low journalistic quality and credibility among digital natives (Soon and Patel, 2022). Nest Center's report (Soon and Patel, 2022) highlights that the rise of social media use and platforms' engagement algorithms challenges legacy media contents and fueling the race of low-quality viral contents. In such a competitive yet resource-poor environment, sensationalism and clickbait thrive, and disinformation easily fills gaps left by weakened professional reporting.

From political perspective, political polarization and growing public distrust in institutions is interrelated to disinformation. Polarization is widening across many democracies and is tightly linked to autocratization. V-Dem (2024; 2025) finds a historic surge in the number of countries experiencing democratic decline since the 2010s, with elevated levels through 2024–2025. Meanwhile, trust in government is low in many countries. The OECD's 2023 cross-country survey shows only **39%** of people in 30 OECD countries express high or moderately high trust in their national government at the same time 44% report low/no trust. (OECD 2024: 2025) It is not only trust in government is low but broader institutional trust is fragile, including media and civil society (Edelman, 2024). This trend of growing polarization and declining trust manifested as elections amplified the divide in the 2024 "super-cycle" of elections, as the Pew Research Center reports polarized contests and anti-incumbent moods across regions (Pew Research Center, 2024). Such volatile political trends instigate further disinformation and make information manipulation a popular tool in ideological and political contest.

While underlying trends act as drivers of disinformation enabling production and distribution of disinformation narratives rapidly and in large scale, **structural challenges** in Mongolia limit Mongolia's ability to effectively and efficiently combat disinformation. Most relevant challenges here are poor governance practices and declining freedoms.

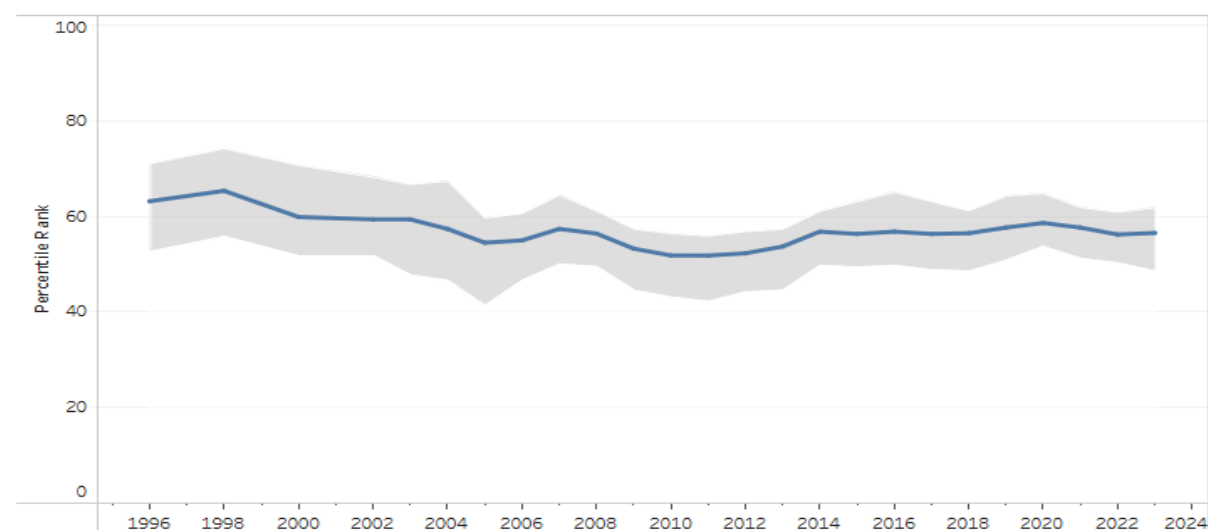
Figure 21. Rule of law index, Mongolia



Source: Worldwide governance indicators, World Bank

Lack of government accountability, transparency and rule of law is a persistent structural challenge in Mongolia. For instance, rule of law index in Mongolia is persistently low, dropping below the level of 1990 – the year of democratic revolution (V-Dem, 2025). Government accountability is not improving as well, as the voice and accountability index suggests, it is lower today than it was thirty years ago. Coupled continuous drop in corruption perception index for the last decade, poor accountability and lack of rule of law demonstrate serious structural challenge of the government to effectively tackle disinformation. This has several eroding effects. Firstly, lack of government accountability, transparency and corruption control restrains civic voice and participation diluting public trust in government institutions.

Figure 22. Voice and accountability index, Mongolia

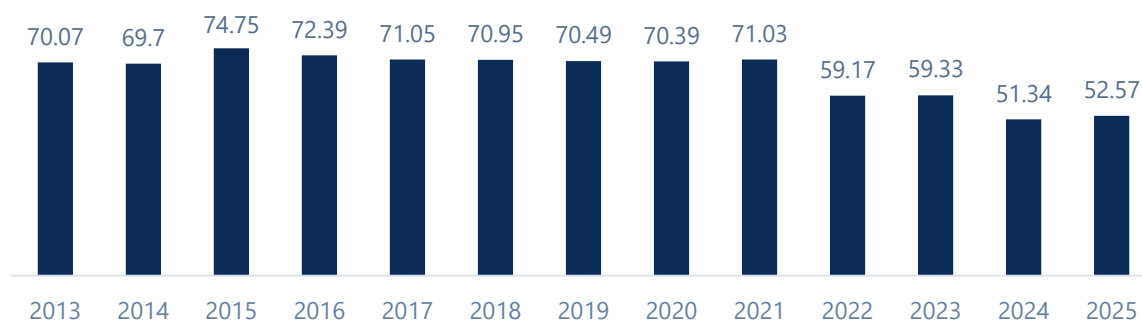


Source: Worldwide governance indicators, World Bank

Secondly, poor government integrity and accountability, and lack of rule of law restrains government ability to effectively formulate and implement policies to combat disinformation. Though there are certainly regulations and policies, though limited and uncoordinated, currently in place as discussed in the previous section. Unfortunately, interviews and validation workshop discussions unraveled concerns

that such regulations and mechanisms are not being implemented in just, consistent and equal manner. For example, workshop participants ask if the CRC's green channel with Facebook was used to remove and restrict dissidence rather than to combat disinformation. Sentencing journalists under Article 13.14 of criminal code is another potential case where lack of rule of law undermines regulations countering disinformation. Moreover, our mapping findings indicate that government, its agencies and officials, are one of serious actors in disinformation (see Section 2), demonstrating that absence of good governance practices foster disinformation.

Figure 23. Press freedom index, Mongolia



Source: Press freedom index, Reporters Without Borders

Another serious challenge stems from declining media freedom and closing civic space in Mongolia. Mongolia's press freedom index was almost in uninterrupted decline for the last decade. Not only the structural challenges of media ownership, institutional capacity, sectoral self-regulation, but also broader restriction of freedom of expression through defamation and "false information" regulations facilitate arbitrary lawsuits against journalists and severely restricted press freedom, inciting self-censorship and partisanship in media sector. In parallel with declining media freedom, civic space is closing, and fundamental freedoms are being restricted. According to CIVICUS Monitor, civic space in Mongolia is "obstructed" with a score of 60. Obstruction of civic space – similar to press freedom – rooted in complex challenges of weak sectoral and institutional capacity, limited resources, low civic engagement and participation, but most importantly restriction of fundamental freedoms and human rights violations. For example, freedom of expression was restricted by Article 5.13 about "Violation of disaster protection laws" of the Infringement Law. (GIC, 2021) NHRCM (2021) reported in its 20th Annual Report on the State of Human Rights and Freedoms in Mongolia report that citizens were convicted by the infringement law for expressing their opinions through their social media accounts. The right to association, peacefully protests, and assemble is facing challenges such as unproportionate legal restrictions and ambiguous regulations. For instance, in 2021, according to the GIC's research, in 51 cases of demonstrations, authorities used methods such as fines, coercion, detention, and forced dispersion. The 20th Annual Report on the State of Human Rights and Freedoms in Mongolia (NHRCM, 2021) states that even though some demonstrations were not dispersed by force, the organizers or initiators were subjected to fines. There were several attempts to introduce bills to further endanger civic space and fundamental freedoms, such as the draft Law on Association and Foundations, vetoed Law on Protecting Human Rights in Digital Spaces. Such restriction of media freedom and civic space, coupled with other challenges in these sectors, limits media and civil society to play its crucial role as strong and efficient actors in combating disinformation.

To further complicate the challenge, **fundamental societal weaknesses** magnify effects of disinformation and undermine social resilience. Number of issues could be considered as a fundamental

weakness or gaps, such as lack of technological development, geopolitical impact, socio-political transition effects, etc. However, weak digital, media and information literacy of citizens was brought up by many interview participants. NSO reports digital literacy in Mongolia as 43.8% (NSO, 2022). And it is not only digital and media literacy. Civic education in Mongolia remains to be low. Together, it prevents citizen from meaningful voice and participation and makes them more susceptible to disinformation. Unfortunately, up-to-date research evidence remains to be limited on this issue to further understand and analyze it.

Lastly, though critically important, Mongolia's efforts to combat disinformation have significant **gaps and limitations** limiting and preventing its effectiveness. Discussions in the previous section touched on the issues around just implementation of regulations, incoordination and fragmentation of countering disinformation efforts, limitation of scope and sustainability of some initiatives, and negative effects on freedom of expression. However, the most important gap in Mongolia countering disinformation efforts is the failure to recognize the spectrum of complexity, layers of actors, organization and funding of information manipulation. Current regulations mainly focus on combating disinformation contents and penalizing individuals and journalists and fails to hold accountable actors higher in the "disinformation value chain".

In this context holistic, cross-sectoral, whole of society approach is essential to effectively counter disinformation. The countering disinformation strategy needs to adapt and respond to driving trends, address structural challenges and fundamental weaknesses for long-term efficiency and resilience, and to target most harmful disinformation – consistent, continuous, organized – and actors involved in such disinformation.

Conclusions

Disinformation has become a serious threat in Mongolia, not a marginal phenomenon. With around four in five citizens expressing concern, it is now distorting public debate, undermining trust, and causing tangible harm across sectors in society. Disinformation now affects multiple spheres simultaneously – public health (e.g., vaccine disinformation and HPV-related falsehoods), economic decision-making, social cohesion, and particularly politics and governance – undermining citizens' capacity to make informed choices and participate meaningfully in democratic life.

Digital transformation has fundamentally altered the cost and scale of information manipulation. Advances in information and communication technologies, the near-universal spread of the internet, and especially Facebook's dominance in Mongolia have made it cheap, fast and easy to produce and disseminate misleading content. Social media algorithms that reward engagement, combined with tools like paid "boosts," fake accounts and bots, allow emotionally charged falsehoods to reach very large audiences in a short time. Emerging AI tools are beginning to add synthetic content to this mix, even though most disinformation is still based on manipulated or selectively framed "real" content.

At the same time, socio-political fragilities amplify the spread and impact of disinformation. The digital factors interact with deeper structural issues: high social and political polarization, economic and editorial vulnerability of the media sector, weak public-service media, and already low levels of trust in institutions and news outlets. These conditions create a fertile environment in which disinformation spreads more easily and is more likely to be believed, while also making it harder for credible actors to correct false narratives and rebuild trust.

Within this environment, disinformation is increasingly organized and professionalized. The study identifies the contours of a nascent "disinformation economy," in which multiple actors – from political sponsors and strategic communicators to media outlets, influencers and troll networks – perform distinct roles along a coordinated value chain. The study shows that impactful, sustained disinformation in Mongolia is rarely the work of isolated individuals. Instead, it is driven by networks of actors performing different roles: originators/sponsors (government agencies, political actors, foreign actors), PR and media teams that design narratives and content, media outlets and influencers that distribute them, and troll networks and ordinary users that amplify them. These networks activate especially around high-stakes political or geopolitical issues and appear to operate in a quasi-market, providing "services" to manipulate information space and public opinion. Political actors are at the center of domestic disinformation dynamics, yet they are the most common target of disinformation as well. Interviewees consistently identified politicians and political parties as the dominant domestic source and sponsor of disinformation, particularly during elections and major political events.

By contrast, current responses remain limited, reactive and fragmented. Legal and regulatory tools are often narrow, punitive or vaguely framed, creating risks for freedom of expression and independent journalism without necessarily addressing the systemic drivers of disinformation, raising the concern over further policy responses potentially being misused, restrictive and harmful for democracy and human rights. Efforts by civil society, media organizations and international partners – such as fact-checking, media literacy and support to quality journalism – are valuable but under-resourced and limited in effectiveness.

As a result, Mongolia's society, institutions and citizens remain highly exposed. Persistent and organized disinformation fuels declining trust in media and political institutions, undermines confidence in

democratic processes and contributes to anxiety, frustration and polarization among citizens. Structural constraints – fragile media independence, uneven digital and media literacy, socio-economic inequalities and governance deficits – further limit social resilience and leave specific groups particularly vulnerable. Addressing disinformation in Mongolia therefore demands a comprehensive, human rights centered and long-term approach that simultaneously strengthens institutions, supports independent media, builds citizens' critical capacities and tackles the political and economic incentives that sustain the disinformation economy.

Recommendations

Invest in further systematic research on disinformation and responses. Study findings revealed systemic vulnerability to disinformation and significant faps in policy responses, which call for further systemic research and evaluation on specific elements and domains of disinformation in Mongolia. Therefore, it is necessary to commission in-depth and longitudinal studies to map disinformation types, actors and vulnerable groups, and to rigorously assess the effectiveness and unintended consequences of current legal, regulatory, educational and platform-based countermeasures.

Prioritize resilience, capacities and institutions over “fighting content”. Disinformation content is expected to grow, as it is becoming increasingly affordable and fast to mass produce false and manipulative content and narratives. Allocating already scarce resources for combatting disinformation contents directly is inefficient and ineffective. Rather, policy and funding should be focused on strengthening democratic resilience—independent media, accountable governance, and citizens’ critical capacities—and on addressing structural drivers of disinformation, rather than relying mainly on criminalization and ad-hoc content removal.

Strengthen the integrity and accountability of political parties and public institutions. Recognizing that government agencies, state institutions and especially political actors are recognized as key originators of disinformation, at the same time political actors are most commonly being targeted by disinformation, it is important for political institutions to ensure transparency, integrity and accountability in their operations and operations of its members. For instance, adopt and enforce clear standards of integrity for political communication, ensure transparency of political advertising and PR arrangements, and reinforce oversight and sanctions for organized manipulation that erodes public trust.

Make all counter-disinformation measures transparent and evidence-based. Before advocating any new measures its important to assess effectiveness and gaps in current measures and enforce them accordingly. Due to low government accountability and transparency, weak rule of law, stakeholders are not informed and included in designing, implementing, monitoring measures countering disinformation. Naturally, it raises concern over integrity of implementation of such measures. Therefore, it is crucial to systematically monitor, publicly report on and independently evaluate existing tools (e.g. criminal provisions, the CRC–Facebook “green channel”, e-Mongolia complaint functions), and use this evidence—together with input from media and civil society—to adapt, narrow or redesign measures.

Consider a broad mix of policy tools, not only legal regulation. International actors and experts advocate for holistic, whole-of-society approach, and calls to restrain from restrictive legal regulation and over penalization. Decision makers and government agencies should also move from a narrow focus on criminalization and ad-hoc regulation toward a holistic, multi-stakeholder policy toolbox that includes public communication, support for independent media, education and literacy, institutional cooperation, technology and innovation, and platform transparency, alongside carefully designed laws.

Strengthen independent, accountable and sustainable media. As a key actor in promoting information space integrity, thus countering disinformation and information manipulation, comprehensive and collaborative effort to strengthen accountable media in Mongolia is and essential underlying measure. This includes expanding support for media freedom, self-regulation, ethical standards and investigative journalism, while reducing political and financial capture (including

ownership control, opaque “cooperation agreements” and “silence contracts”) and addressing structural vulnerabilities that make outlets dependent and prone to disinformation.

Bolster fact-checking, innovation and broader civil-society responses. Stakeholders should cooperate to provide stable support, visibility and enabling conditions for independent fact-checking centers and networks (such as MFCC, FCM and “Facts First Mongolia”), and support innovation, coalition-building and advocacy by media and rights organizations working to counter disinformation and information manipulation.

Scale up media and information literacy (MIL) for all groups, in partnership with media and CSOs. Considering prevalent vulnerability to false narratives and disinformation among the public, stepping up media and information literacy is fundamental. Although existing MIL initiatives remain limited, it provides solid infrastructure and platform to boost accessible MIL education. Therefore, it is efficient to build on existing digital literacy and MIL initiatives to develop a coherent national approach that integrates MIL into formal education, expands community-based and lifelong learning, and systematically involves media and civil-society organizations in reaching diverse and vulnerable communities. Consequently, the coverage of MIL skills and knowledge across formal and informal education, government digital literacy training and initiatives, and civil society efforts should be carefully mapped and assessed. And stakeholders should collaborate for content sharing in MIL education to ensure sufficient and coherent MIL framework integrated across different structures and efforts.

Improve government communication, openness and respect for the right to information. Government institutions should introduce rapid and efficient communication to timely counter disinformation but also ensure proactive and meaningful transparency and disclosure practice to fulfill citizen’s right to information and proactively inform public to prevent disinformation. To ensure timely, proactive and consistent public communication, media and public communication teams and offices at government institutions need to have strong professional teams, clear guidelines and policies to ensure accountable and ethical public communication, use open, fact-based communication to reduce information vacuums that disinformation can exploit. Moreover, transparency and data-protection reforms need to be fully implemented, while closing loopholes that allow over-classification – such as official secret regulation allowing government agencies to classify information in their own discretion.

Deepen structured, accountable cooperation with digital platforms and tech companies. Considering predominant role of social media in distributing disinformation, Mongolia should maintain and refine cooperation mechanisms with platforms (e.g. the “green channel” and e-Mongolia reporting), with clear mandates, due-process guarantees, transparency on volumes and outcomes, and a focus on identifying and disrupting inauthentic networks and coordinated manipulation.

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