

# ASSESSMENT OF PAST AND ONGOING COMMUNITY ENGAGEMENT AND OUTREACH ACTIVITIES RELATED TO THE EXTRACTIVES SECTOR IN MONGOLIA

## Final Report

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### Draft Documents Handover:

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To Whom (AMEP Activity Lead)	Adam Smith International
Signature	
By Whom	Tselmegsaikhan Lkhagva (The CEO of IRIM)

### Final Report Handover:

Final Report Handover	
Date Submitted	
Submitted by Whom	
Received by Whom	
Signature	
Approved by Whom	
Signature	
Date Approved	

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## **Managing Contractor**

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We hope that this report will provide valuable information and insights. We look forward to continuing to work together towards the effectiveness and gap of community engagement and outreach activities relevant to the Mongolian extractives.

# Authors



## **Bolormaa Purevjav, Team Leader**

Mrs. Bolormaa holds MBA degree from Griffith University Australia. She is an international development specialist with over 15 years of experiences in program management, monitoring and evaluation, stakeholders' engagement, mining, sustainable development and empowering communities. Effective facilitator and trainer with a focus on results and innovation. She worked with UNDP, UNICEF, SIDA, SDC, GIZ and Government of Mongolia. Currently she is PhD candidate in the Mining Engineering Department, Fellow at the Institute of Asian Research, School of Public Policy and Global Affairs, University of British Columbia. Her research focuses on Water Governance and management, policy, sustainable development and gender. Her recent work was in supporting organizational development, gender mainstreaming and stakeholders' participation in water management planning. Bolormaa speaks English, Mongolian, Russian and Czech. Countries of experiences include Canada, Mongolia, Kyrgyzstan, Ethiopia and Czech Republic.

## **Chimeddongdog Tsegmid, Communication Expert**

Mr. Chimeddongdog holds MA in Journalism, Mongolian Humanitarian University, and attended international non-degree programs, including Joint program on Journalism of the Press Institute, Mongolia & Aarhus University, Denmark; Media Development: Investigative Journalism – Research; Media Training- Public Speech, Deutsche Welle Akademie, Germany. His area of expertise is investigative journalism and communication in economic and mining sectors. He is Deputy Head of Ethics Committee of the Media Council, and a Mentor and Consultant at Youth Policy Watch NGO. He is a Member of Human Rights Defenders Committee at the Amnesty International Center; Founder & Coordinator of the Journalists' Club "Changers" for economic and extractives industry, USAID & PIM; and Co-founder at Mongolian Center for Investigative Reporter (MCIR).

## **Munkhchimeg Davaasharav, Senior Researcher on Communication**

Mrs. Munkhchimeg Davaasharav is an independent media consultant and journalist. She works with the Media Council of Mongolia to promote gender-ethical journalism in Mongolian news media by training and coaching local journalists and newsrooms. She recently published Newsroom Guidebook on Gender-Ethical Journalism and Guidebook for Editors on Gender Equality in Political News. Munkhchimeg started her career as an economic journalist with one of the Mongolian leading newspapers "Unuudur" (Today) in 2008. Since then, she has contributed to many prominent print media in Mongolia and to international media such as Reuters, NYT, and The Guardian. Munkhchimeg graduated from Ivanovo State University, Russia as a journalist and holds MBA in Media Management from the Stockholm School of Economics, Riga, Latvia.

## **Tselmegsaikhan Lkhagva, Executive director**

Tselmegsaikhan holds a Master of Sociology from the National University of Mongolia as well as a Master of Development studies from the University of Melbourne. Tselmegsaikhan is the CEO of the Independent Research Institute of Mongolia (IRIM). Through leading IRIM, she has developed and managed all types of research and consultancy projects in Mongolia and several Asian countries for development stakeholders, including bilateral and multilateral donors, government agencies, non-profits and private sector. She has over 14 years of experience in social research in various topics including community engagements in natural resource; social impacts and gender dimensions in extractive sector and urban and rural changes. Tselmegsaikhan aims to contribute the development of good policy and programs informed by independent research evidence and strong stakeholder engagement. Tselmegsaikhan speaks Mongolian and English. Countries of experiences include Mongolia, Australia and Timor-Leste.

**Oyundelger Enkhtuvshin, Coordinator**

MA in Environmental Management and Development, Australian National University (2017). Area of expertise: Research and advocacy in environmental and social development; Community-based natural resource management, with a focus on participatory research and development (at FAO Forestry Project); and Project management.

**Khaliunbat Batdorj, Researcher**

BA in Sociology, National University of Mongolia, 2012. Area of expertise: Environment and extractive sector survey, field data collection, qualitative and quantitative survey methods

**Nandintsetseg Naidansuren, Researcher**

BA in Sociology, National University of Mongolia, 2022

Area of expertise: Environment and social survey, field data collection, qualitative and quantitative research methods.

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# Acronyms

AMEP2	-	Australia-Mongolia Extractives Program Phase 2
ASI	-	Adam Smith International
ASM	-	Artisanal and small-scale mining
CEO	-	Chief Executive Officer
COVID-19	-	Coronavirus disease 19
CRK	-	Citizens' Representative Khural
CSO	-	Civil society organization
CSR	-	Corporate social responsibility
CSS	-	Council for Sustainable Development and Social Responsibility
EIA	-	Environmental Impact Assessment
EITI	-	The Extractive Industries Transparency Initiative
EMP	-	Environmental Management Plan
ENG	-	English
EPI	-	Environmental performance index
ERI	-	Economic Research Institute
ESG	-	Environmental, Social, and Governance
FAQs	-	Frequently asked questions
FGD	-	Focus Group Discussion
GDP	-	Gross Domestic Product
HSE	-	health, safety and environment
IAPP	-	International Association of Public Participation
ICMM	-	International Council on Mining and Metals
IFC	-	International Finance Corporation
IGF	-	Intergovernmental Forum on Mining, Minerals, Metals and Sustainable Development
IR	-	Inception report
IRI	-	International Republican Institute
IRIM	-	Independent Research Institute of Mongolia
IRM	-	Independent Reporting Mechanism
KII	-	Key Informant Interview
KPMG	-	Klynveld Peat Marwick Goerdeler
LCA	-	Local cooperation agreement
LLA	-	Local level agreement (LCA and LLA can be used interchangeably as those terms have same meaning)
LLC	-	Limited liability company
MERIT	-	Mongolia: Enhancing Resource Management through Institutional Transformation Project
MM	-	Ministry of Mining
MMHI	-	Ministry of Mining and Heavy Industry
MNC	-	Multinational companies
MNET	-	Ministry of Nature, Environment and Tourism
MNT	-	Mongolian Tugrug
MON	-	Mongolian
MRPAM	-	Mineral Resources and Petroleum Authority of Mongolia
NGO	-	Non-governmental organization
Obs	-	Observation
OGP	-	Open Governance Partnership



PICOC	-	Population, intervention, comparison, outcome, context
PWM	-	Participatory Water Monitoring
QD	-	Qualitative Discussion
RMF	-	The Responsible Mining Foundation
RQ	-	Research Question
SLO	-	Social License to Operate
SLR	-	Systematic Literature Review
SOE	-	State-owned Enterprise
SWB	-	Step without border
UNDP	-	United Nations Development Programme
USD	-	United States dollar

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# Executive Summary

Australia-Mongolia Extractives Program Phase (AMEP2) intends to create a favourable investment environment for the Mongolian extractive sector. It pursues effective partnerships with multi-stakeholders to improve the scientific, institutional, and regulatory environment of the mining sector, as well as to bring more engaged public participation. To build public trust and encourage community engagement, updates and adjustments in mining communication policy and innovative engagement methods are required.

In this regard, the Independent Research Institute of Mongolia (IRIM) undertook comprehensive research to assess the effectiveness and sustainability of the previous and current community engagement and outreach efforts in the extractives sector of Mongolia and to identify gaps and provide recommendations.

A team of 6 researchers reviewed a) 221 peer-reviewed academic articles (16 of which were selected for in-depth analysis), b) 63 websites of mining companies operating in Mongolia (29 of which were selected for in-depth analysis), c) 10 issues of 2 mining newspapers, d) 4 perceptions reports related to Mongolia mining, environment and development, e) 8 reports related to transparency, competitiveness, and environment in Mongolia, and f) 9 community engagement-related manuals produced by donor organizations in Mongolia. The research team also conducted 17 interviews with key stakeholders and held 2 focus group discussions with local communities.

The research found that previous and existing engagement and outreach efforts have been limited in their effectiveness and sustainability, but it has increased awareness among stakeholders that community engagement requires community participation and understanding, and takes effort, and time. It is not one or few stand-alone activities, it is a process where the community can meaningfully participate and benefit from it, it is a process where information exchange and communication among stakeholders creates transparency, opportunities for building trust, increases accountability and possibilities for collaboration.

The research found that awareness-raising and outreach materials such as published brochures, leaflets, or company introductions for local communities are very limited.<sup>1</sup>

The research found that the majority of mining companies<sup>2</sup> do not have community engagement or social responsibility policies in their corporate management policy. There are examples of a few companies that have community engagement or social responsibility policies and their relationships with local communities are well-established, long term and well-maintained.

The research provides evidence and rich insights into why existing engagement and outreach efforts have not been effective and sustainable, and what contributes to this current state.

The research findings demonstrate that local perception is overall negative.<sup>3</sup> The perception of local communities is tied to the level of trust in mining companies, and this trust is low. The environmental performance of mining companies is one of the key indicators of the local community to have trust.

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<sup>1</sup> During this research, none of the mining companies that we approached to share outreach materials, did provide any kind of published materials for the public or communities. Few mining companies have online outreach materials on websites.

<sup>2</sup> Mongolia has large, medium, and small mining companies. In terms of ownership, state-owned and private; and multinational, national and foreign invested.

<sup>3</sup> Local people and herders see degraded and destroyed lands next to their soum territory and are cautious about mining development in their territory.

The research finding indicates that mining companies face business risks – political, reputational, and local acceptability.

The research identified good practices at the local level and identified elements that contribute to collaboration, trust building, improved understanding, resolving emerging community concerns, and relationship establishment.

The research found that communication, face-to-face meetings, the most relevant<sup>4</sup> information (e.g., detailed information on water resources (access, quality), job opportunities, spending of donations provided by mining companies, local level agreements) availability, accessibility and transparency of information are the missing elements in community engagement and relationship establishment. The research concludes that the lack of communities' participation in decision-making, especially in the environmental impact assessment for granting an exploration or exploitation permit is one of the main unmet needs. Secondly, the lack of local community participation in local-level agreements with mining companies and the lack of transparency of these agreements is another unmet need of local communities.

The research found that local communities' concerns raised due to mining impacts are often not addressed, this is the third unmet need of local communities. Moreover, this fact contributes to raising mistrust in mining companies.

As a starting point the research team recommends improving communication and information sharing across and among organizations and individuals; improving information dissemination channels, and making sure information is up-to-date, trustworthy, and relevant to whom the information is intended.

More detailed information on the research process, findings, gaps, conclusions and specific recommendations can be found in the corresponding sections of this report.

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<sup>4</sup> It would be context specific, however the common relevant information for herders, local communities would be detailed information on water resources (access, quality), job opportunities, spending of donations provided by mining companies and local level agreement.

# Glossary

Glossary of key terms and concepts		
No		
1	Aimag	Mongolian administrative and territorial unit, equivalent to a province or state. Mongolia has 21 aimags
2	Associations	An organization of persons having a common interest. In this research, associations refer to organizations of the extractive sector of Mongolia engaged in activities such as promoting responsible mining. Example: Mongolia Mining association.
3	Bagh	The smallest division of administrative units of Mongolia. A soums is sub-divided into baghs.
4	Civil society organizations (CSO)	CSOs are non-state, not-for-profit, voluntary entities formed by people in the social sphere that are separate from the State and the market. CSOs represent a wide range of interests and ties. They can include community-based organizations, non-governmental organizations (NGOs), social movements, volunteer organizations, indigenous peoples' organizations, mass-based membership organizations as well as communities and citizens acting individually and collectively. In the context of the UN Guiding Principles Reporting Framework, CSOs do not include business or for-profit associations.
5	Community	A group of people living in the same place or having a particular characteristic in common
6	Community engagement	A process of working collaboratively with and through groups of people affiliated by geographic proximity, special interest, or similar situations to address issues affecting the well-being of those people
7	Complaint	An expression of dissatisfaction with the company, typically referring to a specific source of concern and/or seeking a specific solution.
8	Consultation	The process of discussing something with someone in order to get their advice or opinion about it.
9	Corporate social responsibility (CSR)	When a business monitors and ensures its support of laws, ethical standards, and international norms. In addition to integrating this into corporate structures and processes, CSR often involves creating innovative and proactive solutions to societal and environmental challenges, and collaborating with internal and external stakeholders to improve CSR performance.
10	Disinformation	The deliberate dissemination of false or inaccurate information in order to discredit a person or organization.
11	The Extractive Industries Transparency Initiative (EITI)	The EITI is the global standard to promote the open and accountable management of oil, gas and mineral resources.
12	EITI Report	Countries implementing the EITI Standard publish EITI Reports that disclose the revenues and other information from extraction of the country's natural resources.
13	Environmental Impact Assessment (EIA)	A document prepared to analyze the impacts of a proposed action and released to the public for review and comment
14	Engagement	The level of involvement and participation of individuals or groups in the communication process, as measured by the frequency of communication, the level of interaction, the quality of feedback, and the degree of collaboration.
15	Extractive industries	Usually refers to the oil, gas and mining industries
16	Foreign-invested company	A business form which allows an enterprise to invest financially in a business or project in a foreign jurisdiction
17	Grievance	An issue, concern, problem or claim (perceived or actual) that an individual or community group wants a company or contractor to address and resolve.
18	Grey literature	Information produced on all levels of government, academics, business and industry in electronic and print formats not controlled by commercial publishing i.e. where publishing is not the primary activity of the producing body.
19	Local community	The inhabitants of immediate and surrounding areas of company's activities

20	Local level agreements (LCA)	Agreements between companies and local Government which are intended to enforce obligations for involved parties and commitments towards local development (sometimes called Local cooperation agreement)
21	Misinformation	The sharing of inaccurate and misleading information in an unintentional way.
22	Outreach activities	Activities to inform and reach out communities and stakeholders
23	Perception	The ability to understand, make judgments about something based on information, experiences, knowledge and senses
24	Primary data	Primary data refers to data that has been collected for the first time, the data collection process is generated by the researcher himself/herself through surveys, interviews, and experiments, specially designed for understanding and solving the research problem at hand.
25	Private company	A firm held under private ownership
26	Secondary data	Secondary data refers to using existing data generated by others for their purpose and not for the current research problem. It is accessible in the form of data collected from different sources such as government publications, censuses, internal records of the organization, books, journal articles, websites and reports, etc.
27	State-owned company	A legal entity that is created by a government in order to partake in commercial activities on the government's behalf.
28	Stakeholder	Stakeholder means any people or groups who are positively or negatively impacted by a project, initiative, policy or organization.
29	Systematic literature review (SLR)	A comprehensive and transparent search conducted over multiple databases and grey literature that identifies, selects and critically appraises research in order to answer a clearly formulated question. It should follow a clearly defined search strategy and protocol or plan where the criteria is clearly stated before the review is conducted.
30	Soum	The second level administrative and territorial unit below the Aimags.
31	Sub-council	A local-level multi-stakeholder engagement structure to inform and address mining-related issues, to ensure community participation and transparency. In some cases, it is also referred to as 'Tripartite Council'.
32	Social Impact Assessment	A way of analyzing, monitoring and managing the social consequences of resource development. In Mongolia the Environmental Impact Assessment does not consider Social Impact Assessments as part of the legal and regulatory requirements.
33	Social license to operate (SLO)	Broad acceptance of a company's activities by society and/or local communities. Separate from the government or a legally granted right to operate a business. Without this approval, a business may not be able to conduct its activities without incurring serious delays and costs.
34	Transparency	The unfettered access to timely and reliable information on decisions and performance

# 1 Introduction

## 1.1. Background

The extractives sector of Mongolia accounts for 23 % of the country's Gross Domestic Product (GDP) between 2010-2021.<sup>5</sup> In recent years, the Mongolian mining sector has accounted for about 20 % of GDP, more than 90 % of exports and more than 20 % of government revenue, and about 3.6 % of total employment (Baatarzorig, Galindev, & Maisonnave, 2018).

The Ministry of Mining and Heavy Industry (MMHI) has identified the need to build stronger collaborative relationships with communities, better understand roles and responsibilities, and create opportunity to share concerns and voice opinions. Until recently, traditional institutional communication, public relations, and marketing outreach proved to be not so effective in engaging and stimulating citizen's participation and debate, thus challenging the public trust and institutional credibility.<sup>6</sup>

AMEP2 initiated 'Making Minerals Valuable' project to enable communities, CSOs, herders and the youth to share their views and practices via new and innovative communication methods. The initiative has two components: (1) assessing public participation policy and outreach efforts in Mongolian extractive sector, and (2) developing a new communication strategy plan adapted into the local context.

## 1.2. Project purpose

The main purpose of the research was to assess the **effectiveness and gap in community engagement and outreach activities** relevant to the Mongolian extractives. To achieve this goal, the following objectives will be pursued:

- Review of past and ongoing engagement and outreach materials, and delivery methods where possible;
- Review of existing perception survey reports of the Mongolian extractives sector;
- Conduct gap analysis based on the reviews; and
- Develop recommendations for innovative, priority engagement and outreach strategy.

## 1.3. Project management and organization

IRIM undertook the following research to assess the effectiveness of past, and current community engagement and outreach activities in response to a request from the AMEP2. IRIM mounted a team researchers to work on this activity. These individuals were supported by IRIM's logistical and management team. To undertake this task and to ensure that the research would be effectively communicated, IRIM internal team meetings were organized regularly in addition to progress meetings and consultations with AMEP team. IRIM also maintained contact with the client (AMEP2) through meetings and emails with the Activity Manager and the Team Lead. To ensure a fuller perspective of the consultation process a series of 2 field visits were successfully organized and interviews on the national and local level were conducted. The overall research work took place from December 7, 2022 to March 10, 2023.

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<sup>5</sup> Measuring Economic Diversification, NSO, MED and UNDP, 2022

<sup>6</sup> AMEP2, RfP, 2022

## 2 Research methodology

The overall approach for this research assessment was formulated fully in line with the objective of delivering a precise, evidence-based assessment of past and ongoing community engagement and outreach activities related to Mongolia's extractive sector with a focus on mining.

Based on the research method selected, designed and implemented a series of key research questions (RQ) that were identified in the commencement of this research assignment. The following highlights the key lines of enquiry:

**RQ1.** *How effective and sustainable have previous and existing extractives-related engagement, awareness, and outreach efforts been for Mongolians in urban or rural settings?*

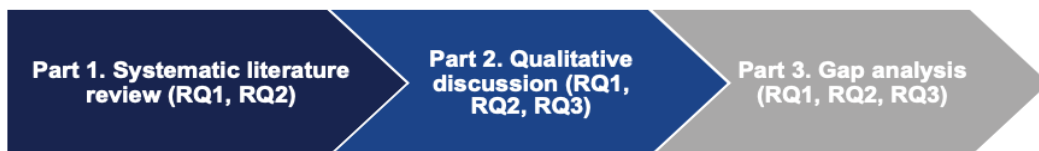
**RQ2.** *What is the Mongolian people's perception of the extractives sector and how it has and continues to evolve? How do these perceptions affect and influence public attitude and engagement? What risks (reputational, political, social, and economic) do companies face in relation to community engagement and evolving perceptions?*

**RQ3.** *What are the unmet needs? What are the missing elements in engagement and outreach efforts required for more informed and engaged public participation?*

The assessment undertook an exploratory and consultative approach to better understand stakeholders' perceptions and perspectives on community engagement and outreach activities.

The research employed Systematic literature review (SLR), Qualitative discussions (QDs) and gap analysis methods to assess the effectiveness of community engagement and outreach efforts in the extractive sector based on secondary and primary data.

Figure 1 Assessment parts



Each research method is explained in the table below.

Table 1 Descriptions of Applied Research Methods

Methods	Descriptions
Systematic literature review (RQ1, RQ2)	SLR method was used to identify and synthesize scholarly research on 'mining perception, community engagement and outreach' conducted between 2018-2022, including published and unpublished studies, and websites. SLR allowed the researcher to understand the breadth and depth of the existing body of research on 'mining perception, community engagement and outreach'. By, analyzing, and synthesizing and summarizing related literature, conclusions were drawn, and guidance and recommendations were provided. These were used for conducting QDs in the field as well as for the assessment.
Qualitative discussions (RQ1, RQ2, RQ3)	The qualitative discussions were used to gather in-depth information on views and opinions on past and ongoing community engagement practices and outreach activities. These were undertaken through organized focus group discussions and interviews with key informants. The findings from interviews and discussions provided important insights, experiences and views of research participants. Local context QDs are extremely useful to generate insights for future community engagement planning and were used in this process.



Gap analysis  (RQ1, RQ2, RQ3)	Based on the analysis of the SLR and findings of the KIIs, a <b>gap analysis</b> was conducted to <b>compare actual performance with potential or desired performance</b> (target). This sought to identify elements of effectiveness and sustainability that are not sufficiently represented in the reviewed materials.
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**The primary<sup>7</sup> data** was collected through Key Informant Interviews (KIIs), Focus Group Discussions (FGDs) and field observations (Obs). Primary data were analyzed by applying a qualitative content analysis approach.

**Secondary<sup>8</sup> data** sources included academic articles, workshop proceedings, journals, mining companies' websites, grey literature, newspapers, news around mining events, and perception surveys.

A systematic literature review and content analysis methods were used for the identification, selection, review and analysis of the aforementioned secondary data and communication materials<sup>9</sup> produced within last five years around the Mongolian extractive sector in English and Mongolian languages. A research analytical framework was developed in advance to guide the research analysis. See Annex 6 Analytical framework

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<sup>7</sup> Primary data refers to data that has been collected for the first time, the data collection process is generated by the researcher himself/herself through surveys, interviews, and experiments, specially designed for understanding and solving the research problem at hand.

<sup>8</sup> Secondary data refers to using existing data generated by others for their purpose and not for the current research problem. It is accessible in the form of data collected from different sources such as government publications, censuses, internal records of the organization, books, journal articles, websites, and reports, etc.

<sup>9</sup> Although the team searched for outreach materials related to mining and targeted for communities during the field work, any printed (hard copy) material, such as brochures and newsletters, were found. Only soum governor in Buregkhangai provided the printed copy of the soum development plan and soum specific journal published by EITI dated back to 2014. Step 1 requested but not response.

## 3 Research process

The research started with collecting secondary data (Part 1) followed by primary data collection (Part 2) and analysis. The details of each step for these two categories of data are explained below.

### 3.1 Secondary Data Collection, Review, Analysis and Synthesis Process

The secondary data collection was conducted between December 19, 2022, and February 05, 2023. The team worked on identifying, selecting, reviewing, analyzing and synthesizing relevant articles, reports, websites and newspapers to address RQ1 to RQ2. A total of 73 items were identified, selected, reviewed and analyzed as per Table 2.

Table 2 Secondary Data Collection, Review, Analysis and Synthesis

#	Type	Number Examined
1	Scholarly articles from Web of Science and Scopus databases using SLR method	16
2	Mining companies' websites and their content by using both quantitative and qualitative content analysis approach.	29
3	Mongolian mining newspapers ("Transparent Community", "Mining Review")	10
4	(Mining) perceptions surveys	4
5	Grey literature	8
6	News related to main events (Mining Week) of extractives sector	6
Total		73

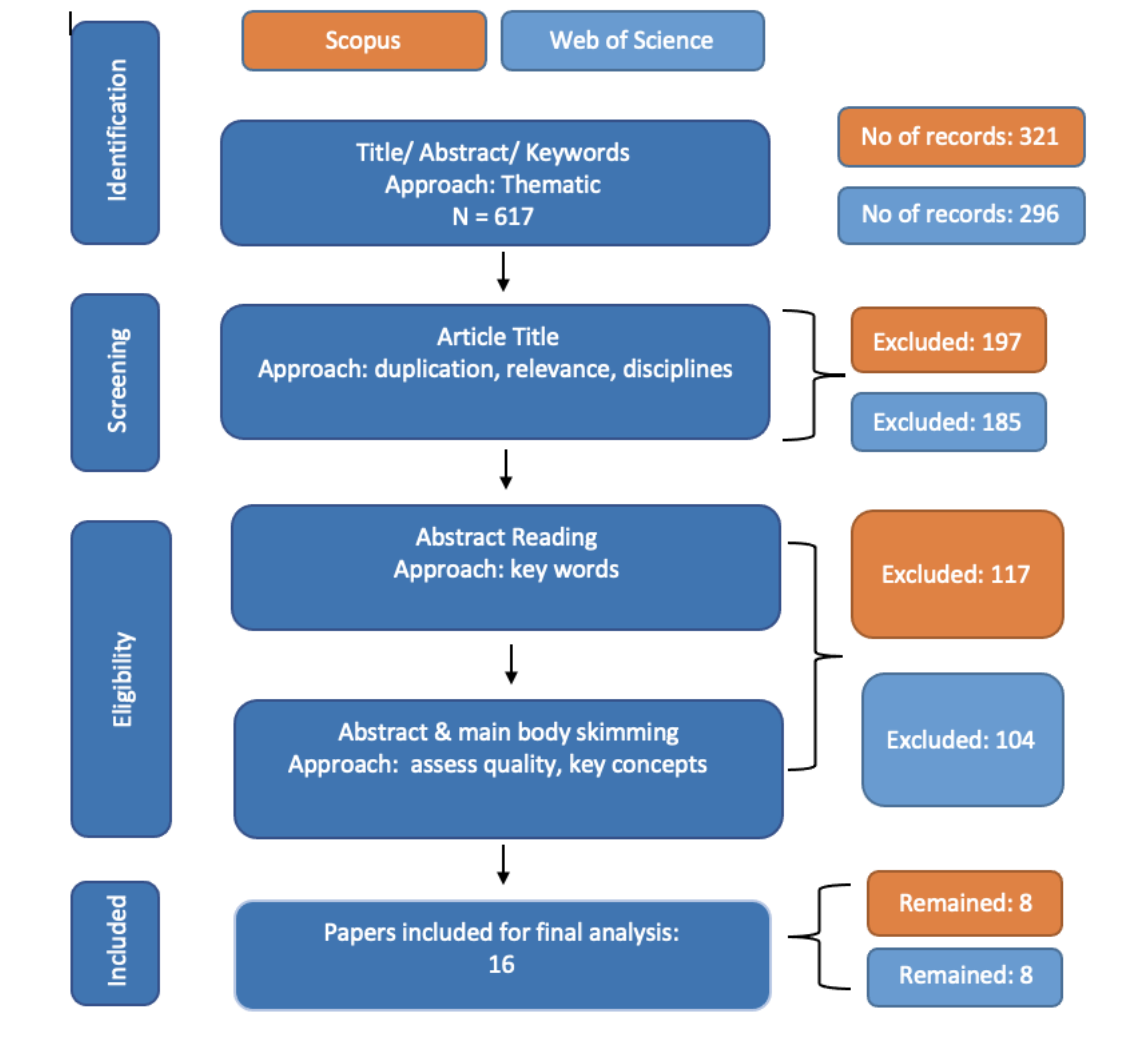
#### 3.1.1 SLR Process

The SLR method was applied to analyze the scientific evidence on the *Community Engagement, Stakeholders' Engagement, Corporate Social Responsibility, Social License to Operate* in the extractives sector. The search for articles was carried out in Dec-January 2023 through the Web of Science and Scopus database. These databases were chosen because they cover most of the scientific fields, including multi- and interdisciplinary studies.

The following search strategy was used: 1) "community engagement" and mining" or, 2) "stakeholders' engagement" and "mining" or, 3) "corporate social responsibility" and mining" or 4) "social license to operate" and "mining".

We obtained a total of 296 items from the Web of Science database and 321 items from the Scope database. After the screening, applying inclusion and exclusion criteria, and extracting key concepts, the number of articles for analysis was reduced to 16 articles. These 16 articles were directly relevant to the research questions and research goal. Please see Figure 2 Articles selection steps in SLR.

Figure 2 Articles selection steps in SLR



Sixteen articles were analyzed using PICOC strategy which is provided in:

Annex 2 SLR PICOC analysis of Mongolian experiences

Annex 3 SLR PICOC analysis of international experiences

### 3.1.2 Mining companies' website review process

This review process included identification and selection of mining companies, and review of the companies' community engagement, sustainability policies, community awareness-raising digital materials in Mongolian language. A quantitative and qualitative assessment of the company's websites was conducted. For this assessment the sample comprised 63 companies that are in the Mongolian Sixteenth EITI Reconciliation Report 2021 (Mongolia EITI, 2022). The companies have been grouped into three categories:

- 1) State-Owned Enterprises (SOEs) -11,
- 2) Foreign or foreign-invested private companies operating in the country –21
- 3) Mongolian private companies –31.

These companies represent large, medium, and small-scale operations in different phases of the Mine Life Cycle. As a result, companies have different levels of active or less active community engagement and the level of responsiveness to community concerns is different. Below is a summary

of steps undertaken:

The following keywords in the Mongolian language were used to identify websites and online data: *social responsibility, sustainable development, community development, community engagement, community event, and consultation.*

A set of questions were developed to guide the content review and analysis. The following questions are as follows:

1. Do mining companies actively maintain (update) websites?
2. SOEs, foreign or foreign-invested, and Mongolian private companies differ in their use of website communications?
3. Do these companies prioritize community engagement/development, sustainable development, and CSR?
4. What are mining companies' websites' dominant and rarely used communications tools to inform/engage the users?
5. What messages are being communicated regarding community development/engagement and social responsibility?

After a random review of mining companies' websites, key components for the website content analysis were identified to apply a quantitative and qualitative content analysis approach and identify dominant communications tools to inform/engage the users and key messages the companies sent through their websites regarding social responsibility, sustainable development, and community engagement. See the Table 3 below.

*Table 3 Key components for the website content analysis*

Website assessment types	Quantitative Data	Qualitative Data
Keywords in mission, vision & values	Yes/No	If "Yes," extract for qualitative assessment
Keywords in the home page category	Yes/No	If "Yes," extract for qualitative assessment
Annual report/CSR is available to download	Yes/No	If "Yes," extract for qualitative assessment
Outreach materials (news, videos, posters, etc.)	Yes/No	If "Yes," extract for qualitative assessment
Public awareness-raising campaign	Yes/No	N/A
Events for community	Yes/No	N/A
Users can comment	Yes/No	N/A
Frequently asked questions (FAQs)	Yes/No	N/A
Feedback/Grievance	Yes/No	N/A
Contact information	Yes/No	N/A
Social page through the website	Yes/No	N/A

### 3.1.3 Content analysis of mining newspapers

Mining newspapers, "Transparent Community" ("Ил тод орон нутаг") and "Mining Review" ("Эрдэс баялгийн тойм"), were recommended by the interviewees representing media and the EITI as key sources for information gathering. A review and assessment were conducted on articles between the years from 2021 to 2023. Among them, 2 issues of the "Transparent Community" newspaper and the random sampling of 8 issues of the "Mining Review" from January 2021 to December 2022 were selected for the analysis.

*Table 4 Newspaper sampling*

#	Newspaper	Year	Total issues collected	Number of issues analyzed	Months included in the sample analysis
1	"Transparent Community"	2022	2	2	
2	"Mining Review"	2021	12	4	January, April, July, October
		2022	12	4	March, June, September, December
<b>Total</b>			<b>26</b>	<b>10</b>	

Two issues of the "Transparent Community" newspaper were published in 2022 by the EITI Mongolia Secretariat to provide data-driven and reliable information on mining to the local community. The newspaper's first edition featured Dalanjargalan soum, Dornogovi aimag, and 300 copies were distributed to the community through the "Steps Without Borders" (NGO). The second edition featured Erdenetsagaan soum, Sukhbaatar aimag, and 1000 copies were distributed by the community's NGO's initiative.

The "Mining Review" is a monthly newspaper, it disseminates news about the mining industry to the public under the motto of "*Sustainable Mining Development*." From 2000 to 5000 copies were distributed to its readers through the postal services of "Tugeemel Post" and "Mongol Post." Moreover, digital editions of the newspaper reach more than 40,000 readers through e-mails and websites.

The issues were analyzed using qualitative content analysis to identify key actors and highlighted themes. In the analysis of the identified newspaper articles, content was compiled in accordance the following criteria:

- Main columns, main types, and genres of newspaper articles and their content
- Scope of coverage (national or local)
- Key actors (human sources)
- Columns and thematic articles on community engagement, community development, and CSR
- Articles that increase public awareness and understanding of community engagement will be taken for the case study.

### **3.1.4 Perception surveys review process**

To supplement the study with relevant Mongolia country data, the team extracted data from the following reports related to mining and environment-related surveys:

- [Environmental Performance Index, 2022](#)
- [Provincial Competitiveness Report, 2022](#)
- [Endline public perception survey. Mining, communities & water management project, International Finance organization \(IFC\), 2021](#)
- [Public opinion poll: Residents of Mongolia, International Republican Institute \(IRI\) and IRIM, 2022](#)

### **3.1.5 Grey literature<sup>10</sup> review process**

A total of eight documents were reviewed with the intention to complement the research with information relevant to the research questions and overall to the assignment. These data were related to the environment, information availability, access and transparency; community, the economic contribution of mining and its impact on local development. The relevant information was extracted to complement the qualitative part of research findings.

- [Intergovernmental Forum \(IGF\): Mongolia Mining Policy Framework Assessment Report 2017](#)
- [Sustainability outlook of Mongolia, 2018](#)
- [Responsible Mining Index report, 2020](#)
- [IGF Case study: The importance of Consultation and Engagement in Environmental and Social Impact Assessments, 2023](#)
- [Mongolia Mining Policy Framework Assessment Report 2017](#)
- [Fact Finding Mission Report on the impacts of mining on defenders and environment in Khentii and Dornod provinces of Mongolia, 2019](#)

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<sup>10</sup> Grey literature is "Information produced on all levels of government, academics, business and industry in electronic and print formats not controlled by commercial publishing i.e., where publishing is not the primary activity of the producing body."

- [Impact of Coronavirus disease \(COVID-19\) on Mongolian Mining Sector, presentation of survey findings, 2022](#)
- [Stakeholders' participation assessment report on knowledge, attitudes and practices in mining decision-making, 2017](#)
- [Independent Reporting Mechanism \(IRM\): Mongolia Transitional Results \(2019-2021\)](#)

The team reviewed a number of manuals and guides supported by donor organizations. These manuals and guides provide clear guidance on stakeholders' engagement, land rehabilitation, human rights and business, and outline main concepts and principles. These are resource materials therefore do not fall under specific timeframe. These are useful materials for mining companies and other stakeholders. This activity was complementary activity to demonstrate that there are resources available for effective stakeholders' engagement.

1. [Training Manual on Responsible Mining, United Nations Development Programme \(UNDP\) in Mongolia, 2019.](#)
2. [Assessment report on the of knowledge, attitudes and practices of stakeholders involved in mining decision-making, 2016, World Wild Fund \(WWF\) funded by European Union \(EU\).](#)
3. [Participatory Environmental Monitoring guide, Step without border \(SWB\), funded by UNDP, 2021](#)
4. [Good community engagement practices 2016 Canada's Minerals and Metals Sector](#)
5. [Human Rights Due Diligence Training Facilitation guide \(mon\), 2021,](#)
6. [Frugal Rehabilitation Methodology, Field Handbook, 2016. Asia Foundation, Ministry of Mining \(MM\), Swiss Agency for Development and Cooperation \(SDC\)](#)
7. [Frugal rehabilitation demonstration in Mongolia, 2016. Asia Foundation, MM, SDC](#)
8. [Stakeholders Engagement, 2016. Asia Foundation, MM, SDC](#)
9. [Digital manual on Preparing, Negotiating and Ensuring the Implementation of Local Cooperation Agreement, 2020, Open Society Forum](#)
10. [Mine Life Cycle, 2016-2017, SESMIM Program](#)
11. MERIT Project knowledge portal <http://portal.merit.mn/en/>

### **3.1.6 Selected news on significant mining events in Mongolia**

Regarding COVID-19 restrictions, public events were rarely organized during the timeframe of the research scope. In September 2022, the Ministry of Mining and Heavy Industry and Oyu Tolgoi jointly organized the "Mongolia ining Week" event for the 100th anniversary of the development of the mining industry in Mongolia. The conference was described by the media as the biggest conference in 100 years. As for the first time in Mongolia, the extractives industry gathered for a week. The government, state and civil society organizations, foreign and domestic companies, investors, local authorities, local people and herders were represented.

At the conference, people's understanding of mining and local cooperation were specially discussed. That is why, within the framework of the research, the team reviewed the content discussed during the conference based on the sources of *Mongolian Mining Journal*, *Zuunii Medee* Newspaper, *Unuudur* Newspaper, and main news sites of [www.gogo.mn](http://www.gogo.mn), [www.ikon.mn](http://www.ikon.mn), [www.time.mn](http://www.time.mn), etc.

### **3.1.7 Primary Data Collection, Review, Analysis and Synthesis Process**

The primary data collection and analysis was conducted between January 16 and February 09, 2023 at the national and local level. The research team proceeded with KII, FGD and Obs according to the pre-developed exploratory interview methods and questions to collect views of the national and local level stakeholders in the extractive sector.

A total of 17 KIIs were conducted between 2023.01.16-02.09 at the national level (in Ulaanbaatar) with participants representing international organization, NGOs, media, government organization, and

mining company.

At the local level, QDs were based on FGDs of community representatives in addition to a few KIIs with local government, and local NGOs (Artisanal and small-scale mining (ASM) Partnerships in this case) and active community members who are actively engaged in information and communication in that area.

*Table 5 Qualitative discussions*

Activity	Stakeholder	Number of activity	Number of Participants	Location
KII	Central government agency responsible in mining and geology	2	2	UB
	Local government	2	2	Soums
	Multi-stakeholder organization	1	1	UB
	Media	2	2	UB
	Mining companies	2	3	UB
	NGOs	1	1	UB
	Donors	2	2	UB
	Association	1	2	UB
	Local NGOs/Active community members	2	2	Soums
FGD	Community members (soum center residents and herders)	1	8	Soums (Buregkhangai)
		1	7	Soums (Khuld)
<b>Total</b>		<b>17</b>	<b>32</b>	-

QDs were supplemented by **field observations** at four locations in the selected soums. It helps understand people's behavior, habits, needs and social relations in their environment and provides insights into local contexts. It included field notes made by the researcher, audio recordings, photographs, and published materials collected at the sites.

In processing the data collected through KIIs and FGDs, the interview records were transcribed in Mongolian and checked against the records for validation. The data analysis applies an inductive bottom-up approach to derive a general conclusion. The process is as follows:

- Screening to organize and extract findings that provide answers to the interview and research questions;
- Closer reading to detect any pattern and regularity in the data through content analysis;
- Perform comparative analysis between stakeholder groups to identify any gaps;
- Formulate a tentative hypothesis from the pattern and comparison;
- Derive a general conclusion.

# 4 Research findings

## 4.1 Summary of main findings

Primary and secondary data show that overall previous and ongoing engagement with local communities and local government have not been very effective. The research findings provide insights into why these activities were not effective as explained briefly in the table below. Detailed explanation of those findings according to each thematic area indicated in the headlines of the table are discussed in the following sub-sections by each source of data, as well as provided in the Annex 4 in more detail.

Table 6 Research findings by each source of data

Type s of data sources	Source of data	Effectiveness of previous and ongoing public engagement and outreach in Mongolian extractives sector	Understanding of community engagement:	Public attitude	Risks and opportunities	Desired communication and engagement approach	Gaps identified
Secondary data sources	SLR	There is evidence of four mining companies that consult, involve and collaborate with local communities. However, the general picture demonstrates that previous and ongoing outreach was/is not very effective. The community participation level is low. Community consultation is very rare. Open day for communities is 2-3 times a year.	A thorough understanding of community engagement is very limited among Mongolian companies, except for a few companies. Most mining companies lack a CSR culture. A wealth of evidence, good practices and lessons from international experiences.	Provide insights into determinants of public trust toward mining,	Risks: Community resistance.  Environmental risks, social risks  Opportunities: creating jobs, improvements in infrastructure	Communities want to be consulted and involved in decisions. Identify communication and engagement approaches in consultation with local communities. Mining companies use local news, media to communicate their environmental performance and donations and support to local development.	Companies do not build a relationship with communities. They mostly communicate with local Governments. Communities' concerns related to land degradation and impacts on water resources are not addressed. Information gaps Communication gaps Unmet expectations from communities on mining contribution to local development.
	Grey literature	Lack of transparency prevents engagement Government's institutions often don't have the adequate understanding and	Recommends to understands community needs and priorities A low level of	Communities have a history of bad mining experiences, small and	climate change vulnerability, environmental degradation	<i>Environmental and Social Impact Assessments</i> as tools, as essential processes for the community's	Few companies make sustainability reports, environmental performance is mixed, Government has done



Type s of data sour ces	Source of data	Effectiveness of previous and ongoing public engagement and outreach in Mongolian extractives sector	Understanding of community engagement:	Public attitude	Risks and opportunities	Desired communication and engagement approach	Gaps identified
		<p>correct attitude to recognize, respect and support defenders' work.</p> <p>The Mongolian extractive industry has limited knowledge and lacks willingness to respect human rights. The mission revealed that local authorities have been ineffective in preventing and addressing human rights violations, including threats against people advocating for land rights and the right to live in a safe and healthy environment.</p> <p>The local community's awareness and knowledge about mining operations in their soums are relatively lower in comparison with the local officials' awareness and knowledge about mining operations in their soums.</p>	<p>understanding regarding how to develop and manage agreements between mining companies and local governments to ensure benefits to mine-affected communities and a lack of requirements for consulting with affected stakeholders at every stage of the mining cycle and there is no system for regular documentation on social and economic impacts from mining development.</p> <p>Both, mining companies nor the local Government do not address the concerns and grievances of local citizens.</p>	<p>medium mining companies do not properly assess the impacts on the environment, ignore environmental consequences, and consultation with local citizens at the latest stage makes engagement not effective.</p> <p>Resistance is common because citizens do not distinguish between exploration and exploitation</p>	<p>Mining companies found the Government regulations difficult to follow. Many companies faced production, sales, human resources, financial and investment challenges and couldn't maintain stable operations. Lack of integrated local and national government mining policy Political instability impact mining operations.</p>	<p>participation in decision-making to influence project plans and provide meaningful input to decisions</p>	<p>little to systematically assess and address the costs of possible environmental and social impact from the mining sector. Civil society stakeholders reported no engagement between the government and civil society, with no opportunities for civil society to influence decision-making or be informed of commitments' progress Companies and local governments put little effort to minimize the environmental, social and cultural impacts of mining operations. Local citizens are not informed about potential environmental risks and impacts Citizens are not involved in the discussion of the EIA report.</p>
	Companies' websites	Most companies outreach the community with financial support such as	Even though many companies claim that they prioritize	-	There is room for mining companies to	Mining companies can efficiently use official websites to	Lack of digital outreach materials targeting local communities. The

Type s of data sour ces	Source of data	Effectiveness of previous and ongoing public engagement and outreach in Mongolian extractives sector	Understanding of community engagement:	Public attitude	Risks and opportunities	Desired communication and engagement approach	Gaps identified
		scholarships, sponsorships, and donations. However, only a few companies provide evidence on their official websites that they involve community engagement and consultation. Regarding digital outreach materials posted on the companies' websites, they were mainly for the general public and not directly targeting communities.	community needs, only a few evidence on community consultation, involvement, and engagement were found on their websites.		improve two-way communication, such as providing opportunities for users to comment, give feedback, and go to the company's social media page from its official website.	disseminate digital outreach materials such as newsletters, announcements, and awareness-raising activities targeting local communities.	companies primarily implement one-way communication, not providing enough opportunities for local citizens to comment/give feedback. Moreover, local citizens' voices are not prioritized in the news on the companies' activities on their official websites.
	Mining newspapers	Increased disclosure by local government; One of the engagement approaches is multilateral sub-councils at soum level; Engagement and participation in decision-making and monitoring is not balanced; Not effective due to missing face-to-face engagement;	Local government has higher awareness	More negative in areas with large number of licenses; Negative even companies promised donations due to overall mistrust;	Risks: Degraded land and livelihood of herders due to overlapped areas; Misunderstanding due to poor transparency; Opportunities: Sub-council	Balanced representation and participation of all stakeholders	Lack of community and CSO involvement in decision-making; Lack of disclosure by company and local government creates misunderstanding; Missing compensation and resettlement in overlapped areas that create conflicts and negative attitude; Higher expectation from communities for companies
Primary	Interviews	Previous efforts have been not fully effective as the public attitude is still negative	Understanding on community engagement and its	Public perception is negative in	Risks: Environmental misconduct and	Repetitive and step-wise information and engagement.	The information disclosed does not meet local demands in terms

Type s of data sour ces	Source of data	Effectiveness of previous and ongoing public engagement and outreach in Mongolian extractives sector	Understanding of community engagement:	Public attitude	Risks and opportunities	Desired communication and engagement approach	Gaps identified
		and conflicts still exist at local level. No constructive community engagement is practiced at local level in most mining areas, except for only few company license areas. Community engagement is facilitated in a very limited way, only Citizens' Representative Khural (CRK) members receive information and give feedback to mining related issues, such as EIA, licensing, etc.	importance has increased in recent years.	general. It has been evolving depending on the socio-economic circumstances and general messages about mining in the society, and it differs for company responsibility performances.	ignorance of local level agreement (LLA) commitments deepen negative perception at the local level. Opportunities: Mining companies originated in soums and those collaborate closely with communities are perceived more positively;	Face-to-face communication Multilateral engagement with involvement of key stakeholders as well as neutral ones (e.g., academia). Early informing Combining basic social services into information events (e.g. open day) to ensure broader participation, especially herders. Participatory environmental monitoring Human story is an excellent way to engage local people by sharing their stories.	of content and accessibility. Negative news and messages are spread more broadly and quickly that influence on the whole mining sector is perceived negatively. Human resource gap in company public relations and community engagement areas. Statement made by unprofessional company representative is not communicated properly.
	FGDs	At soum level, there is no mechanism to ensure the community engagement and listen to their opinions other than the bagh public meetings. Local people send their suggestions related to mining to the bagh and the soum governors.	Participation via implementation of mining projects and hearing the EIA report through the bagh public meeting.	The attitude of the people in active mining regions is negative.	The closer the relationship with the citizens, the more positive the local community's attitude towards the mining company.	Meet citizens individually and in group meetings. Determine the possible methods of obtaining citizens' opinions and follow them up.	Citizens are not regularly informed. Information is obtained through word of mouth from people closer to the information.

Challenges faced by mining and exploration companies:

- Exploration companies face high probability of rejection and conflict by local communities due to bad mining reputation caused by irresponsible mining
- Company employees have no decision-making authority, thus cannot resolve any community raised issues
- The survey (Economic Research Institute (ERI), 2022) revealed that the majority (64.7%) of mining companies found the Government regulations difficult to follow. Many companies faced production, sales, human resources, financial and investment challenges and couldn't maintain stable operations during COVID 19.

Challenges faced by local government:

1. Mine pits, waste left without rehabilitation.
2. When conflicts arise between company and community, local governments lack power to stop mining activities, the mineral authority is not involved.
3. ASM practices: negative experiences and perceptions related to environmental and social safety.

Challenges that local communities face in engagement:

- Community complaints are not resolved
- Livestock suffer from dust, and becoming prone to diseases
- Lack of information on compensation, LLA.

## 4.2 Findings from Systematic Literature Review

The academic literature notes that mining companies are responding to increasing pressure to conduct their operations responsibly either by implementing CSR projects in their host communities or by getting SLO. The mining industry see the significance of CSR initiatives or SLO to reduce their business risk.

The following sections highlight distinct experiences and evidences from articles identified and reviewed in the systematic literature review.

### International experiences

Sustainable CSR outcomes are achieved by addressing the community's needs through primary stakeholder consultations (Serfontein-Jordaan & Dlungwane, 2022).

Short-term CSR projects take the form of donations.<sup>11</sup> However, these donations provide temporary relief. These projects only benefit a small group instead of the broader community. As a result, such projects are unsustainable as they are not intended to address the root cause and cannot benefit future generations. To reduce this shortcoming and improve the sustainability of CSR outcomes, some mining companies developed policies to implement long-term sustainable projects instead of short-term ones. Long-term CSR projects embrace infrastructure, education, health and skills development, and they are sustainable because they benefit future generations, and their impact advances the community from an economic, social and environmental perspective.

Companies need to balance diverse stakeholder expectations such as infrastructure projects such as roads (improving repair poor road conditions), water and sanitation, electricity, housing, recreational facilities and telecommunications infrastructure.

Educate stakeholders on corporate mining issues throughout mine lifecycle.

Role of stakeholders perception on mining impacts is important in CSR planning, reflecting local needs and its implementation. In South African mining sites, the public perception is more negative on environmental and social impacts while it is relatively positive for the economic impacts. The CSR projects focused on infrastructure development, but the community expectations were higher on the employment and local livelihood opportunities. The authors argue that unmet expectations and the prevalence of negative perception are the source of mistrust and further resistance of the mining projects (Seloa & Ngole-Jeme, 2022).

Coordination mechanism<sup>12</sup> to support collaboration between local municipality and companies (van der Watt & Marais, 2021).

Engage community in project planning and in decision-making to achieve economic, social and environmental sustainability (Matikainen, 2022). Simply engaging with stakeholders in the mining industry is not sufficient for enhancing sustainability. Constructive stakeholder engagement in forms of dialogue and collaboration is crucial for developing mutual understandings and striving towards sustainability, case of Germany (Matikainen, 2022).

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<sup>11</sup> Research evidence suggests thta majoroty of mining companies work with local Government, and provide donations.

<sup>12</sup> A mechanism, Social and Labour Plan (SLP), was In the South African mining industry, adopted to ensure the fair distribution from mining for all. The Mineral and Petroleum Resource Development Act of 2002 states that a mining company can only obtain a mining license if th Department of Mineral Resources and Energy (DMR) approves its SLP (Van der Watt & Marais 2021). Aligning the SLP of a mining company with the Integrated Development Plan (IDP) of the local municipality is a precondition for approval; as a result a collaboration between mining companies and local governments has become mandatory (Van der Watt & Marais 2021). The IDP aims to co- ordinate the work of the local government and other industries within the community in a coherent strategy to improve the quality of life for all people living in an area.

- Supporting local businesses through employment, social skills training and development
- Understanding stakeholder values and creating shared stakeholder values
- Environmental protection projects
- Incorporate lessons learnt in the future Engagement plan

*Table 7 Aspect of sustainability*

Aspect of sustainability	Sustainability factors	The role of stakeholder engagement
Economic	Creating new jobs Source of income for local communities Maintenance of buildings and infrastructure Establishment of pension funds	Including communities in the decision-making structures Stakeholder collaboration to gain inputs on decisions Engagements to create jobs Supporting local businesses through employment
Social	Skills training and development Avoiding public health issues Avoiding community dependency on the mine Serving local communities' social needs	Stakeholder engagement to understand stakeholder values Creating shared value in ways that promote stakeholder values Including local communities in the decision-making structures
Environmental	Protecting the environment Provision of sustainable landscape gardening Adoption of clean energy	Incorporate lessons learnt in the way of work in the future Engaging in multi-stakeholder fora to solve environmental concerns

*Source: Matikainen, 2020*

An alternative practice of engaging community in project planning is EIA process. In the Canadian Arctic, effective proponent-led community engagement was practiced during the EIA of a mining project through co-management agreement; with reflection of indigenous cultural-sensitivity and traditional knowledge (Prno et al, 2021). The four main community engagement approaches were applied in this several-year EIA process:

1. Early engagement and context-specific approach
2. Comprehensive record-keeping and reporting
3. Meaningful incorporation of community perspectives
4. Long-term relationships, partnerships and local benefits

As a result of this multiple-year recurrent engagement process, concerns were addressed, broad community support was gained and the project approval was secured.

Communities expect companies to provide local employment and procurement opportunities, be more financially transparent, and meet community and societal infrastructure and environmental demands (Kot-Niewiadomska et al., 2022).

To accept a mining project, communities must perceive the project's potential benefits as greater than its risks. Maintaining a social license and meeting community expectations was rated the number four risk in the mining industry in 2021 (Klynveld Peat Marwick Goerdeler (KPMG), 2021).

One element to achieve social acceptance – expressed by SLO in the mining industry is through education and awareness raising of the society (Kot-Niewiadomska et al., 2022). In a case of a mining community in near Mekong River, in Thailand, the villagers had concerns on potential heavy metal

pollution in water and soil due to a lack of information from the project and it led to conflict between the community and the mining company (Kilajiana & Chareonsudjai, 2021). Responding to the public concern water and soil tests were taken, and the heavy metal concentration except for arsenic were under national soil quality standards, and did not change significantly from the baseline. This case shows importance of consideration of information accessibility and adequacy for community; effectiveness of communication tools; and opportunities to make informed decisions about future development projects that have direct impacts on community livelihoods.

SLO has an increased focus on social accountability that involves inclusive decision-making. One approach is multi-party meaningful dialogue to improve rural governance. There are two ways of dialogue; (1) a strategic model of dialogue (more structured dialogue with specific goal or outcome) more flexible and responsive to stakeholder needs., and (2) a learning model of dialogue (less structured free-flowing conversation & co-learning through stakeholder exposure to diverse perspectives) desires specific outcome e.g. reach consensus. Both can be constructive dialogue as those prefer symmetrical two-way linear flow or communication and have potential for personal and social transformation (but rare in practice) as participants perspectives are challenged by others' experiences. One of the most effective dialogue is a face-to-face verbal exchange between community and industry representatives for development of mutual understandings through exchange and co-construction of views, opinions, ideas, information, or values. It is different from "consultation" as consultation is described as driven by a single party whereas dialogue is based on equality among different parties at the table (Mercer-Mapstone et al, 2018).

Companies engage stakeholders to prevent from conflicts induced by competition for resources, particularly water (water was associated with 58% of complaints for Latin American mining projects). As part of community engagement, Participatory Water Monitoring (PWM) has been popular in Latin America which involves the concept of citizen science (is a process by which the public can participate in scientific research, for example, by providing collection samples). PWM programs are different types in terms of the extent of community involvement: 1. Externally driven and professionally executed (1st most typical), 2. Externally driven, with local data collectors, 3. Collaborative monitoring with external data interpretation, 4. Collaborative monitoring with local data interpretation, and 5. Autonomous local monitoring (2nd most typical). In general, PWM is more informing rather than affecting decision making. Regular PWM could empower citizens in decision-making. The main takeaway from this case is a framework for assessing participation in PWM in mining context:

1. Conceptualization (externally-led, collaborative, locally-led),
2. Collection (local, professional),
3. Interpretation (local, external) (Pajera et al, 2018).

ASM tends to be relatively accepted in places where it has become one of the common rural livelihoods and connected to most families. For instances, in a Peruvian boomtown, ASM co-exists with other rural livelihoods even tensions and conflicts related to water pollution, reducing shrimp farming, competition over land, and social divisions are persistent. In addition to economic benefits to local people, power dynamics in social relations, especially ASM leaders who have favorable relationships with local government, influence that dissenting residents' voices are overshadowed, and therefore opposition towards ASM is not powerful enough to demand artisanal mining to be more responsible (Malone et al, 2021).

### **Mongolia experiences**

In Mongolia as well as across the Global South from Africa and Latin America to Central Asia issues such as insecure tenure of small-holders, corruption and political marginalization of rural peoples leave little room for truly participatory decision-making in developmental land acquisition, these issues are persistent (Sternberg et al., 2022).

Frequency of contact with company personnel, procedural fairness, and perceived impact on social infrastructure affect community acceptance and approval by increasing or decreasing trust in the company. Procedural fairness<sup>13</sup> was the strongest predictor, impact on social infrastructure was the second strongest predictor, and contact quantity was the weakest predictor (Batdelger et al., 2022)

- State-owned mining companies face relatively lower public opposition<sup>14</sup> than privately owned and foreign-invested mining companies. In contrast, issues related to the SLO are most common in privately owned and foreign-invested mines.
- Examples of companies that obtained SLO are Oyu Tolgoi LLC and Energy Resources LLC. On the contrary, there have been several instances where mining developments have been delayed, interrupted, or even shut down due to opposition from local communities
- Although many mining companies operate in Mongolia, few implement measures to obtain an SLO. Small and medium-scale mining companies do not provide information to the general public, and they are not transparent<sup>15</sup>. Mining companies in Mongolia do not have a good understanding of SLO. A social acceptance survey has never been conducted in Mongolia. Due to the socialist regime in the past, obtaining SLO is a new phenomenon in Mongolia (Batdelger et al, 2022). Mining companies tend to comply only the legal requirements and tend not to give serious attention to community concerns.
- Even if an SLO is granted at one point in time, it does not mean that the license will remain valid indefinitely, the way to maintain an SLO is to continuously assess the community's attitudes toward the mining project and other influencing factors.

Lack of comprehensive understanding of CSR by communities and corporations is identified as a major drawback for the shaping sustainable CSR practices. The perception of CSR practice is still viewed from the philanthropic perspective-making donation or providing a sponsorship (Altanchimeg Zanabazar, 2019).

- CSR reporting is far from being sufficient in Mongolia, very few companies report on corporate social responsibility programs.
- Moreover, majority of companies are not transparent, meaning they do not disclose their profits, management activities, do not wish to inform, respond to official inquiries, even close the offices and there are cases even no accounts registered with tax office
- CSR at local levels is focused on the assessment of company's performance in environmental rehabilitation, tax payments, workplace and environmentally friendly technologies
- Companies show their responsibility by communicating with the local and state government offices and by submitting periodical reports and data to Governments only

The role of local governments and herders in decision-making regarding mineral resources remained of secondary importance (Dalaibuyan, 2022).

- Local-level agreements (LLAs) in Mongolia have been inconsistent. LLAs in Mongolia are: (a) established between mining project developers, not exploration companies; (b) prevalent in soums rather than aimags; and (c) of relatively short duration, typically a year or less.
- Companies viewed LLAs as a government imposition, an additional cost.

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<sup>13</sup> The concept of procedural fairness evolved from two common law principles: that a decision-maker should not judge their own case or have an interest in the outcome, and that a decision-maker should listen to both sides of a case before making a decision. Procedural fairness is not concerned with whether the *outcome* of the decision was fair, but rather whether the *process* was fair. If the process was unfair, you may be able to apply to a court to judicially review the administrative decision

<sup>14</sup> Historically, before 1990 mining companies were state-owned, and there was no notion of community engagement; Mongolia was a socialist country led by the one (communist) party. State-owned companies had no information-sharing, and their social responsibility is highly political in nature.

<sup>15</sup> There is no legal requirements for publication of information (NRGI, 2021). Other reasons could be: (1) not being interesting in community engagement, and seeing community engagement as a burden, fulfilling only what is required by the law, and (2) pays taxes to the government, and the community should demand the central government to distribute the taxes to their soum.



- Lack of initiatives to promote the use of LLAs by the National Government
- Lack of transparency in agreements making process
- LLAs focused only on what should be in the agreement, with no guidance for relationship establishment, processes and implementation of LLAs.

Research shows that the company’s effective communication contributed to the formulation of positive perceptions and trust among local pastoralists in Mongolia (Dagvadorj et al., 2018)

Although mining brings economic growth, it also causes negative impacts on local communities such as disruption of local lives and people’s sustainable livelihoods, people’s mental health, attitudes and social ethics (Sternberg, Toktomushev, Ichinkhorloo, 2022).

Mining-affected people need adequate compensation and relocation plans to cover their losses; however, the lack of standardized resettlement packages creates discrimination, and confusion among local people and intensifies conflict.

### 4.3 Findings from company website content analysis

The results of the website content analysis show considerable variability in how mining companies use their websites to communicate with users through different methods and messages. Websites range from simple ones that focus on basic company information to more complex ones that incorporate a mix of elements, such as virtual tours, events, databases, newsletters, and magazines for users and communities. Moreover, there are differences in outreach materials and community engagement activities among SOEs, foreign or foreign-invested, and Mongolian private companies. While this section discusses summary of main findings, the detailed analyses are provided in the Annex 5.

The results show whether mining companies actively use, and maintain their websites, then presents quantitative analyses relating to component categories to explore what are their websites' dominant and rarely used communications tools to inform/engage the users and whether they are proactive in using two-way communications. Lastly, the result will discuss the key messages mining companies spread through their websites on community engagement.

#### Website Maintenance

Sixty-three companies were selected of these 26 did not maintain a website and eight companies' information either appeared on their parent company's website or their websites were unreachable at the time of this study. Therefore, these companies websites were excluded from further analysis. See the table below.

*Table 8 Companies with websites in operation*

Category	Number of companies	Have Website	N/A	Do not Have Website	Percentage of companies that do not have website
SOEs	11	10	0	1	9
Foreign/foreign-invested companies	21	10	1	10	48
Mongolian private companies	31	9	7	15	48
<b>Total</b>	<b>63</b>	<b>29</b>	<b>8</b>	<b>26</b>	<b>41</b>

The results show that SOEs (refer to state-owned mining companies) are the most active in using websites. Only 1 out of 11 SOEs (9%) analyzed did not have a website at the time of this study. On

the other hand, about 48% of foreign/foreign-invested private companies operating in Mongolia and Mongolian private companies do not have websites.

### **Dominant Communications Components**

The research team applied quantitative content analysis to 29 companies' (10 SOEs, 10 foreign/foreign-invested companies operating in Mongolia, and 9 Mongolian private companies) websites to identify dominant communication components. See the Table 8 below.

Table 9 Website components

Category	SOEs (10)			Foreign/foreign-invested companies (10)			Mongolian private companies (9)		
	Yes	No	Yes %	Yes	No	Yes %	Yes	No	Yes %
<b>Website components</b>									
Key words in mission, vision & values	8	2	80%	9	1	90%	5	4	56%
Key words in home page category	10	0	100%	8	2	80%	8	1	89%
Annual/CSR/Technical report available to download	4	6	40%	5	5	50%	2	7	22%
Outreach materials (news, videos, posters etc.)	10	0	100%	9	1	90%	6	3	67%
Public awareness raising programs	3	7	30%	1	9	10%	0	9	0%
Events for community	2	8	20%	1	9	10%	1	8	11%
Users can comment	2	8	20%	1	9	10%	2	7	22%
FAQs	0	10	0%	2	8	20%	0	9	0%
Feedback/Grievance	7	3	70%	7	3	70%	4	5	44%
Contact information	10	0	100%	9	1	80%	9	0	100%
Social page through website	7	3	70%	6	4	60%	5	4	56%

The websites' component analysis shows that most companies promote themselves as responsible mining companies because 90% of foreign/foreign-invested private companies operating in Mongolia, 80% of SOEs, and 56% of Mongolian private companies include keywords<sup>16</sup> in their mission, vision, and values statements. Moreover, 80-100% of all mining companies have dedicated sections on their websites regarding keywords selected for this study. However, only half of the foreign/foreign-invested private companies, 40% of SOEs, and 22% of Mongolian private companies published Annual/CSR/Technical reports on their websites.

More than 90% of the SOEs, foreign/foreign-invested companies, and 67% of Mongolian private companies publish outreach materials such as news, videos, and posters for the public. However, only 10-20% of all mining companies provide an opportunity to comment on their materials.

Interesting to note is that most companies do not use their website to engage with their users. For instance, only 30% of SOEs, 10% of foreign/foreign-invested companies, and none of the Mongolian private companies run public awareness-raising programs through their websites. Regarding announcing events for communities, 20% of SOEs, 11% of Mongolian companies, and 10% of foreign/foreign-invested companies use their websites.

Even though most companies put their contact information on their websites, many of them still need to use the opportunity to promote their social media page through their website. Notably, 70% of SOEs and foreign/foreign-invested companies and 44% of Mongolian private companies have feedback/grievance systems providing the possibility to ask questions\submit feedback through their website. However, only 20% of foreign/foreign-invested companies and none of the SOEs and Mongolian private companies published FAQs.

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<sup>16</sup> Keywords: social responsibility, sustainable development, community development, community engagement, community event, and consultation.

## Key Messages Based on Website Assessment<sup>17</sup>

### State-Owned Enterprises

Most SOEs underline sustainable development and social responsibility in their companies' mission, vision, and values statements. As there are dedicated sections/sub-sections, social responsibility, environmental protection, employment, procurement opportunities, and safety are the key messages SOEs prioritize. 40% of the SOEs published their Annual or CSR reports, and most have "News" categories that provide information on the company's activities to the communities. While most companies provide information in text and photo format, some, such as "Badrakh Energy" and "Erdenet," had videos, infographics, factsheets, and case studies. However, most of the SOEs outreach materials, such as posters and infographics, needed to be updated.

Regarding social responsibility, most of the SOEs provided information about donations to health & education, herders and veterans, and student scholarships. In addition, some companies like "Erdenet" and "Edenes Tavan Tolgoi" highlights providing socio-economic opportunities for their employees. However, even though few news stories were published about the meetings, visits, and training workshops held for local citizens, those events' discussion points and outcomes were mostly missed. It was noticeably different with "Erdenes Silver Resources" as its website was updated frequently in the last few months, mainly with the news stories on the MicroalgaE as Renewable Innovative green cell Factories (MERIT) project's work on mine closure. Those stories focused on community engagement and shared local citizens' opinions.

### Foreign/foreign-invested companies operating in Mongolia

Most foreign/foreign-invested mining companies in Mongolia value social responsibility, highlighting safety, environmental protection, and community development/engagement. 8 out of 10 companies have dedicated sections on sustainable development/social responsibility that explain their policies in detail. Employing local people, providing procurement opportunities for local businesses, and implementing community support programs such as donations and scholarships were the most common message from the companies.

Half of the companies published their Annual/CSR/Technical reports. Many provide detailed information on implementing the Environmental Management Plan and Local Cooperation Agreement. Some companies use independent mechanisms to engage the community in implementing LCAs. For instance, Southgobi Resources established Corporate Citizenship Committee, Bayan Airag Exploration works with local NGO "Bayan Durvuljingiin Uguuj," and Oyu Tolgoi funds the Gobi Oyu Development Support Fund.

#### *Box 1 Community engagement in Oyu Tolgoi LLC*

The Year in Review 2021 report has an "Engaging with community stakeholders" section. It underlines that the company conducted over 800 meetings and engagements with 1,172 key stakeholders, including government officials, impacted herders, and other community members in Umnugovi. Oyu Tolgoi also organized annual Open Day events in Khanbogd, Dalanzadgad, Manlai, and Bayan-Ovoo soums.

According to its Cooperation Agreement, the company invested USD 5.7 million in the Gobi Oyu Development Support Fund in 2021.

Oyu Tolgoi continued to support agriculture businesses, launched the "Herder" mobile phone app, organized 5 business capacity-building training to 29 participants and 99 consultation meetings, and implemented a pilot project to support herder families to supply camel milk for delicacies production, among other projects and donations.

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<sup>17</sup> See Annex 5 Companies' websites content analysis` for more detailed information on Key Messages.

As of December 2021, local supply represents 25% of Oyu Tolgoi's national procurement, and 24.7% of the total Oyu Tolgoi site workforce was locally hired. In addition, 94 local suppliers provided goods and services worth USD 216 million to Oyu Tolgoi in 2021.

According to its long-term partnership with the National Police Agency, the company held nationwide campaigns on road safety, established speed monitoring cameras on the Sainshand to Zamiin-Uud road.

The report also mentioned donations for preventing and responding to COVID-19 and educational projects and programs targeting teenagers' mental and reproductive health.

Regarding outreach materials, many foreign companies rarely update their news sections in Mongolian. Exceptions were Moncement Building Materials and Oyu Tolgoi LLC. Moncement Building Materials "Media" section is frequently updated with news, videos, and photos, providing information on the company's activities, campaigns, and employees for the public. In addition to frequently updating its "Media" section for the public, Oyu Tolgoi LLC's website publishes a quarterly "Miner" magazine, which features the company's activities and the local community's development.

#### *Box 2 Community outreach in Bayan Airag Exploration*

Bayan Airag Exploration LLC's Social Development report, 64 pages journal, directly targets the community. It provides information on responsible mining, local development, safety, environmental management, human resources, and business excellence based on interviews with more than 35 people. The report highlights local people whom Bayan Airag Exploration hired. According to the report, misinformation about cyanide leakage spreads quite often. However, local people who work at the company point out that there was a minor incident, which was resolved under professional inspection. The report also provides detailed information about the technology and safety to counter the misinformation on cyanide leakage.

Furthermore, it features local decision-makers, and the company's community relations department chairman to provide detailed information on the local development agreement, its implementation, and community engagement activities. In addition, representatives from the local health center, school, local citizens, and herders also share their points of view about the company's activities on social responsibility. Moreover, local business owners share their experiences and benefits from supplying the company. Finally, representatives from local NGOs, such as "Bayan Durvuljingiin Uguuj," funded by the company and invests in local development according to the citizens' proposals, provide details on their work and local benefits.

### **Mongolian private mining companies**

Compared to SOEs and foreign/foreign invested mining companies, only 5 out of 9 Mongolian private companies underline social responsibility in their companies' mission, vision, and values statements. However, most of them have dedicated sections/sub-sections on social responsibility. The key messages include environmental rehabilitation, safety & socio-economic well-being of their employees, donations, and investments in local infrastructure, health, and education.

Only 2 out of 9 companies published their Annual/CSR reports. Moreover, 4 out of 9 companies do not have/update their "News" section. Those who have, provide information on companies' activities, with few news stories on their donations/investments for the community. The exception was Energy Resources, which provided a news story on its "Citizen's Participation in Responsible Mining" open-day event on October 2022 in Tsogt-Ovoo, Khan-Khongor, and Tsogttsetsii soums that gathered 700 local citizens. In addition to informing participants about the company's activities on environmental management and social investment in the communities, the company also conducted surveys, received resumes for open vacancies, and gathered complaints forms. Participants' opinions and feedback were also featured in the story.

### **Summary of Website Findings**

Most companies underline social responsibility in their mission, vision, and values statements regarding

key messages and have dedicated sections/sub-sections. The area of community engagement is essential for mining companies to implement social responsibility commitments fully. Nevertheless, a review of the websites' content indicates that regarding social responsibility, most mining companies devote primary attention to providing jobs & procurement opportunities and financial support (in the form of scholarships, sponsorships, and donations) in thematic areas such as education, health, and culture. Investing in local development, such as building infrastructure, schools, and kindergartens, and implementing Environmental Management Plans and Local Level Agreements were also part of the key messages.

However, only a few companies provide evidence on their official websites that by doing so, they involve community engagement. For instance, some companies such as Oyu Tolgoi, Energy Resources, Southgobi Resources, and Bayan Airag Exploration use independent mechanisms to engage the community in implementing LLAs. Furthermore, most companies post information for the general public on their websites, and only a few examples of digital outreach materials targeting local communities were extracted during the study.

#### **4.4 Findings from content analysis on mining newspapers**

The "Transparent Community" newspaper has published a special issue (Quarter 1, 2022/Volume 1) about the mining of Dalanjargalan soum in Dornogovi Province, which has the largest number of licenses in Mongolia. The content analysis suggests the following implications about the perception and attitude of the local people and administrative management of the soum, which has a rich history of mining exploration and exploitation.

The local government expressed that there is still a misunderstanding with the mining companies in the soum. The quote of N. Boldbaatar, Head of CRK, "Without real information, misunderstandings between companies, citizens, and the conflict will never be resolved" defines the main reason for the lack of misunderstanding and cooperation. He also evaluated the results of the social responsibility activities of the companies, saying that there is no return and benefits for the soum development. For example, the donations of the companies go only to the aimag and not stick to the soum. ("Transparent Community," Quarter 1, 2022/Volume 1)

The soum governor has issued an order to establish a sub-council responsible for ensuring transparency and disclosing the necessary information to the public about mining companies that have violated the rights of herders to live in a healthy and safe environment by transferring their grazing land to mines and are closed to many herders looking for grazing land.

##### *Box 3 Improved transparency of local governments as initiated by EITI*

In October 2021, during the organization of an online training on the importance, need, and use of information transparency for government organizations, companies, civil society representatives, and journalists in the Govi region, initiated by the Secretariat of the EITI Mongolia, Dundgovi, Dornogovi and Umnogovi provinces made their economic data transparent. The information disclosed here included economic returns from mining, changes in environmental and social impacts, and employment opportunities, and these will be published on the websites of the aimags and soums. By disclosing this information at the aimag and soum level, the sub-councils of Govisumber, Dornogovi, Dundgovi, Umungovi provinces, Tsogttsetii, Khanbogd, Ulziit, Dalanjargalan, and Gurvantes soum sub-councils began to cooperate in disclosing the above information, according to the "Transparent Community" newspaper, 1st quarter issue of 2022.

Although the sub-council was established, it had no representation from the company and was dominated by government. Sub-councils expected to have a balanced representation of company, community and government. In other soums and aimags this situation is similar to this, as it can be seen from the general content of the issues of the newspapers. For example, D. Hosbayar, the

Chairman of the Sukhbaatar aimag CRK, admits that the imbalanced participation of parties in the sub-council is the main obstacle to establishment of cooperation between citizens and companies ("Transparent Community," Quarter 2, 2022/Volume 2). From his explanation about the imbalanced participation of the parties in sub-council, active civil society organizations and citizens were not included. Since the representatives of citizens are not involved, in the concluding of the LCA, the opinions of the local community and citizens are not reflected, and there is a lack of participation of citizens in monitoring the implementation of the agreement. Therefore, it is expected that by including citizens' representation in the sub-council, the governance of the mining industry will be improved, the implementation of laws and regulations will be ensured locally, and transparent and responsible mining will develop, thereby increasing the benefits to the local area, increasing jobs, and developing infrastructure.

In Mongolia, it is characteristic that soum government actively participates and expresses its position on issues related to mining. For example, D. Bolortuya, Head of CRK of Erdenetsagaan soum, Sukhbaatar province, described why it was important for mining companies to improve their transparency. According to her, companies need to promote the importance of sustaining their activities after establishing better relations with the local people. On the other hand, the soum administration believes that it is important for companies to strengthen their trust through open cooperation in order to successfully solve their medium and long-term social and economic development goals ("Transparent Community," Quarter 2, 2022/Volume 2).

Representatives of the Har Tarvagatai Mining Company of Uvs aimag believe that the work and investment being carried out in the framework of social responsibility for local development is sufficient. It is one of the top 3 mines in Mongolia in terms of coal quality. The company aims to provide financial gifts to the elderly, support kindergarten activities, enroll women farmers in dairy processing training, distribute coal to citizens, and provide assistance to sports teams and athletes with necessary equipment and uniforms. The misunderstanding with citizens is present and S. Bayarjargal, the chairman of the board of directors of "Khar Tarvagatai" JSC company, explains it by the fact that the Ministry of Finance allocates a very small amount of the funds collected by mining companies to the soum budget. His views "...if more budget is allocated to soums and provinces, then it is possible to develop the region without incurring additional costs from the mining company." ("Mining Review," December 2020).

The newspapers share news about that the company's history of cooperation with herders' groups as a good experience. For example, the sub-council established by the initiative of herder Ch. Namnansuren in Khanbogd soum (in Umnugobi aimag). The sub-council works based on the mutual understanding of company, herders, and local government. If there are any complaints, suggestions or requests from the herders, three parties discuss each issue and reach a solution. The secret of this success is explained by the fact that the herders representatives were elected by the public meeting of the bagh and the internal rule of the sub-council well discussed, developed and followed ("Mining Review," July 2021).

Mining expert journalist G. Iderhangai emphasized that "In order to reach mutual understanding and cooperate successfully with communities, mining companies should meet herders face to face instead of accusing the citizens and herders of not knowing something. Companies actually does not hold live meetings, and to put it bluntly, they runs away and avoids meeting with local people".

On the other hand, the local administration is reluctant to provide information about the company to communities and there are also cases of keeping the official letters and reports from the company in the cabinet of the office and not releasing them further. People have learned to look down on mining because of poor information exchange between the stakeholders. "If this situation continues, mining will not look good." ("Mining Review," November 2022).

According to the [Human Rights Convention](#)<sup>18</sup>, there is a provision for compensation if the licensed area overlaps with the area used by herders. Why is this not implemented in Mongolia to this day? For instances, thousands of herders in the mine-affected area of Dalanjargalan soum have not been compensated or resettled during the 20 years of mining development in that area.

Judging from the content of the newspapers, the lack of information about mining to the local people is the main reason for the misunderstanding between the company and the local people. In order to eliminate this violation, a sub-council consisting of local residents, local administration, and company representatives should be established in soums. The main purpose of this council is to incorporate the suggestions of soum administration and citizens into the the company's social responsibility contract, make information available to the parties and eliminating misunderstanding. However, the sub-council does not achieve the desired results due to the fact that the equal participation of the parties is not ensured. There is a hope that sub-councils can work well learning from the case of Khanbogd soum.

#### 4.5 Findings from public perception on extractive sector in Mongolia

Environmental Performance Index, 2022: Mongolia ranks 155 out of 180 country with a score 29.6 indicating that Mongolia's environmental performance is very low; in terms of addressing climate change impacts Mongolia ranks 178 out of 180 with a score 14.6 which is one of lowest. The environmental degradation is a serious issue. Herders' livelihood directly depends on pasture and water resources.

Provincial Competitiveness Report, 2022: this report evaluates the potential of the province's economy to pursue sustained economic growth. Orkhon, Darkhan, Umnugovi, Dornod and Sukhbaatar provinces rank first 5 provinces whereas Zavkhan, Bulgan, Dundgobi, Arkhangai and Govi-Altai rank as last 5 provinces, important to note that mining operations are Orkhon, Darkhan, Umnugovi, Dornod, Sukhbaatar, Bulgan, Dundgobi, Gobi-Altai provinces. Unfortunately, the competitiveness score has been declining over the last 5 years for most of provinces, except Khentii province.

*Table 10 Competitiveness index of mining provinces*

Provincial competitiveness	2018	2019	2020	2021	2022
Darkhan	96	94.02	89.42	96.1	85.93
Umnugovi	94	97.85	87.52	92.07	85.33
Zavkhan	54	54.63	38.14	36.8	45.14
Bayankhongor	55	48.24	62.26	53.54	49.03
Khovd	54	59.76	69.65	70.42	50.06
Dornod	84	87.14	73.44	78.49	74.83
Uvs	75	71.65	81.46	77.59	59.08
Khentii	71	70.53	69.29	78.19	76.02
Govi-altai	43	46.18	29.82	47.62	48.43

Endline public perception survey. Mining, communities & water management project, IFC, 2021: The report indicates that mining companies seem to be more transparent and collaborative only with the community where they operate. Due to COVID 19 no events organized with local communities; it might impact improvement made in relationship between the locals and the mining companies. Local authorities from mining areas have more positive opinions about mining, specialists from non-impacted

<sup>18</sup> Victims have a right to reparation. This refers to measures to redress violations of human rights by providing a range of material and symbolic benefits to victims or their families as well as affected communities. Reparation must be adequate, effective, prompt, and should be proportional to the gravity of the violations and the harm suffered. Reparation measures include restitution, compensation, rehabilitation, and satisfaction.



areas have more negative opinions.

Public opinion poll: Residents of Mongolia, IRI and IRIM, 2022: Around 60% of all citizens considered macroeconomic issues as the most important issues of Mongolia. In 2022, citizens were predicted to face more economic problems. According to the "Awareness of corruption perception", in 9 of the last 10 years, organizations related to land management were in the lead in corruption issues, followed by mining and law enforcement organizations.<sup>3</sup> 93 % of the Mongolian citizens considered corruption to be a serious problem, which is influenced by the politics that is overly dependent on the mining industry.

The local perception on extractive sector is closely tied to environmental performance of mining companies. Environmental protection was seen as one of key determinants of trust towards the company by herders living close to mine (Dagvadorj et al., 2018). Mongolia is ranked 155 out of 180 countries with score of 29.6 points, indicating a low environmental performance (EPI, 2022). The general public is dissatisfied with the unequal distribution of benefits and costs of mining (Myadar & Jackson, 2019).

**Business Risk:** The mining companies face a huge business risk if community doesn't accept the mining. Over the last two decades, extractive multinational companies (MNCs) experienced community conflicts that stopped mining operations and the cost of delay was tremendous. MNCs understand that without local acceptance, the company faces reputational, social and political risks (Davis & Franks, 2011; Mutti et al., 2012; Taarup-Esbensen, 2020). 32% of executives of mining companies ranked community relations and license to operate as the top Environmental, Social Governance (ESG) risk. Globally, MNCs adopted inclusive, transparent and accountable approaches for engaging and working with local communities to prevent a business risk.

#### **4.6 Findings from grey literature**

These reports indicate that only some companies adopt international environmental practices that meet the community's expectations; international institution recommends mining project approvals be granted only when there is general community support, in other word when company has a social licence to operate.

Sustainability Outlook of Mongolia (2018): Nearly 77 % of land areas have changes in vegetation cover. Expansion of mining operations contributed to land degradation, the regressive trend of plant species. The environmental performance of the Mongolia extractive mining sector is mixed, showing some positive trends in the adoption by some large mining companies of international standard practices to mitigate environmental impacts. The report indicates that the Government has done little to systematically assess and address the costs of possible environmental and social impact from the mining sector's ongoing and planned activities. The National Chamber of Commerce and Industry and the Business Council of Mongolia reported that only recently few companies started working on sustainability reports.

Responsible Mining Index (2020): The Responsible Mining Foundation (RMF) has developed a set of community well-being indicators which include human rights, stakeholder engagement, local economic benefits, and risk assessment to assess the extent to which companies are taking measures to show respect for mining-affected communities and other groups. Rio Tinto's Oyu Tolgoi mine site in Mongolia received the highest score (75%) as it publicly discloses regular independent audit reports which review its performance on social, environmental and health and safety matters and recommend any remedial action.

Local procurement is important economic benefits for affected communities. 30% (75) of the mine sites publicly disclosed the amount of money spent on goods and services from the local area, but very few

mine sites (14) disclosed details on the types of goods and services procured locally. 37 of the 40 assessed companies show up improvement on at least one ESG indicator, offering better practice models for their peers. This includes for example establishing formal commitments to respect human rights and prevent bribery and corruption, improving accountability for ESG performance, conducting due diligence on ESG supply chain risks, and publicly disclosing payments to governments and workplace safety incidents.

IGF Report, 2023: IGF's recently released "*Case study: The importance of Consultation and Engagement in Environmental and Social Impact Assessments (ESIA)*" report emphasizes ESIA as tools, as essential processes for the community's participation in decision-making to influence project plans and provide meaningful input to decisions. IGF recommends mining project approvals be granted only when there is general community support. Support and trust in governments can also erode if a project is approved without community support (IGF 2022). If the benefits of the project are not deemed acceptable to the surrounding communities, the mine is likely to encounter conflicts or other legal and illegal actions.

Mongolia Mining Policy Framework Assessment Report 2017: The IGF's assessment report (IGF, 2017) identified major strengths and gaps in Mongolian Mining Sector. By addressing the gaps, the Mongolian mining sector will be on the path of developing responsible mining in the country. These gaps are related to improving the management of large and high-risk mine wastes and their impacts on water resources, developing a system of planning and regulating mine closure and rehabilitation. The report emphasized that there is a low level of understanding regarding how to develop and manage agreements between mining companies and local governments to ensure benefits to mine-affected communities and a lack of requirements for consulting with affected stakeholders at every stage of the mining cycle and there is no system for regular documentation on social and economic impacts from mining development.

Although the government put efforts to formalize ASM, it does not prevent or mitigate conflicts between small-scale and large-scale miners. Ninja mining damages the environment, apart from the local government-shared cases of ninja miners stealing wood and food from the herders' camps, as well as allegations of abuse towards women living in the gers nearby.

Fact Finding Mission Report on the impacts of mining on defenders and environment in Khentii and Dornod provinces of Mongolia, 2019: Mining operations, regardless of their scale and nature, have negative environmental impacts on the environment and on the people whose livelihoods depend on pasture and water resources. Government's institutions often don't have the adequate understanding and correct attitude to recognize, respect and support defenders' work. The Mongolian extractive industry has limited knowledge and lacks willingness to respect human rights. The mission revealed that local authorities have been ineffective in preventing and addressing human rights violations, including threats against people advocating for land rights and the right to live in a safe and healthy environment (Forum-Asia, 2019).

[Impact of Coronavirus disease \(COVID-19\) on Mongolian Mining Sector, presentation of survey findings, 2022:](#) The Mongolian mining sector was negatively impacted by COVID-19. In 2020, the real GDP of the mining sector decreased by 9.4%. Total mineral exports (except gold) decreased by 17.6%, coal export volumes fell sharply. Only gold exports increased 3- fold due to high prices.

Out of 2826 companies, only 252 mining companies responded to a survey on covid impact on mine operations. The survey also revealed that the majority (64.7%) of mining companies found the Government regulations difficult to follow. Many companies faced production, sales, human resources, financial and investment challenges and couldn't maintain stable operations. Mining sector growth plays an essential role in post-COVID-19 economic recovery (Ragchaasuren, 2022).

Stakeholders' participation assessment report on knowledge, attitudes and practices in mining decision-making, 2017: The local community's awareness and knowledge about mining operations in their soums are relatively lower in comparison with the local officials' awareness and knowledge about mining operations in their soums. 75.2 % of citizens, 15.5 % of government officials have insufficient information; 2.6 % of local residents have very good information about the mining operations, 22.2 % have general information about mining operations. Over 80 % of the local citizens expressed a total lack of information about migration and compensation. Communities have a history of bad mining experiences, small and medium mining companies do not properly assess the impacts on the environment, ignore environmental consequences, and consultation with local citizens at the latest stage makes engagement not effective.

Factors influencing a decrease in trust toward mining:

1. Companies and local governments put little effort to minimize the environmental, social and cultural impacts of mining operations.
2. Local citizens are not informed about potential environmental risks and impacts
3. Citizens are not involved in the discussion of the EIA report
4. Both, mining companies nor the local Government do not address the concerns and grievances of local citizens

Challenges faced by mining companies:

- a) Citizens believe rumours, make unreasonable and impossible demands and oppose them.
  1. Resistance is common because citizens do not distinguish between exploration and exploitation
  2. Lack of integrated local and national government mining policy
  3. Political instability impact mining operations.
  4. Reasonable Recommendations were provided to companies and local governments to address these challenges.

Independent Reporting Mechanism (IRM): Mongolia Transitional Results (2019-2021): Mongolia's third Open Governance Partnership (OGP) action plan (2019–2021) consisted of 13 commitments. Mongolia did not meet the minimum threshold for "inform" citizens during the implementation of the action plan. Civil society stakeholders reported no engagement between the government and civil society, with no opportunities for civil society to influence decision-making or be informed of commitments' progress (Ravio Patra, 2021). Overall, the report indicates that in many areas and sectors, citizens' and CSOs' engagement in public procurement is limited, civic engagement, transparency and monitoring of Local Development Fund are limited, and commitment to Improve Governance of state-owned companies and ensure transparency of contracts are limited; there is no new database was introduced, and information was not released on waste management, ecological responsibility, or sources of waste. Only one commitment related to the extractive industry was implemented: a legal framework for beneficial ownership transparency in the extractive sector. It was implemented by establishing a database by the EITI.

#### **4.7 Findings from review of the significant mining event**

During the Mining Week, the Government of Mongolia acknowledged that there was growing public opposition to the extent that it would disrupt the normal operations of the mining industry. *Mongolian Mining Journal* wrote that mining companies face opposition due to the lack of understanding and information about mining among citizens.

A representative of herders said "The participation of citizens is not ensured at any stage of the mining industry in Mongolia. The Government doesn't listen to their citizens, doesn't ensure their participation and doesn't provide full information."

A common mistake made by mining companies is that they first meet with a governor of soum instead of meeting communities, and start to dig up the land and change the direction of the main water only

through a promise of building a construction such as kindergarten in the soum as stated by the Ecological Police representative.

The Government does not conduct hearings in the mining sector at all and there is an urgent need to implement it and improve community engagement as emphasized the NGO representatives.

According to the local government representatives, the Government policy is not based on the people's intentions and goals and thus it fails to gain support from the local government.

The participants also actively suggested that the draft Law on Minerals be made available to the public. This is because Article 8 of the Law on Transparency of Public Information provides for disclosure of information about any draft law to anyone who requests it. According to the Law on Laws and Legislation, the process of reviewing and voting on the draft law is regulated. Relations based on joint participation, such as engagement between citizens, administrations, and companies in the local area, solving misunderstandings and violations, environmental restoration should be included in the draft law.

Initiatives in the field of how to develop community engagement and improve citizens' understanding were mostly proposed by government organizations and foreign experts. For example, Mineral Resources and Petroleum Authority of Mongolia (MRPAM) informed that before starting mining in local areas, the regulations for the planning of mine closure planning and the placement of the costs will be included in the draft Minerals Law.

A representative of international experts shared an important idea that can be implemented in our country. Companies should first send their representatives to local communities where they are going to work and study the problems and sustainable development issues in that area. In other words, he suggested that we should listen to their voices and know their needs.

A company representative emphasized the importance of considering environmental, cultural and social attitudes of the local people during underground mining activities.

The Government representative committed to improve the legal framework of the extractives industry in line with the new global approach, green development, responsible and transparent governance, increasing access to local citizens and future generations, and creating equal opportunities and fair distribution of wealth.

Citizens and herdsman should be informed, and the mining company should provide open information about what kind of construction and where it will be done, how to ensure environmental rehabilitation, how to reduce the negative impact on human health, and what kind of benefits it will bring to the local areas. The deputy head of the Ecological Police Service put forward the idea that informed citizens would understand all levels of mining operations and conflicts would disappear.

During the conference, citizens, government and civil society agreed that disclosure of information at all stages, from the issuance of mining licenses to the closing of mines, is the best way to build mutual understanding and ensure community engagement. The Government promised to include this regulation when amending the Law on Minerals.

### **4.3 Findings from primary data**

Findings from primary data (QDs) were analyzed according to the following key and supporting themes:

Key themes:

1. Effectiveness of community engagement and outreach efforts
2. Public perceptions and related risks
3. Challenges and reasons for (no/not) effective engagement and outreach

Supporting themes:

1. Most effective and popular communication tools at soum level

2. Good practices of community engagement and outreach
3. Local context (of the two soums where a part of QDs were conducted)

The details of each theme are explained below, as well as provided in a table form in the Annex 4. Interview Analysis.

#### **4.8.1 Effectiveness of community engagement and outreach efforts**

Community engagement culture has developed only when western investors entered Mongolian market. Since then awareness on overall extractive sector and the importance of community engagement has increased compared to the period before 5 years, and it keeps increasing year by year. Some companies, especially big ones work at maximum capacity within CSOs to engage communities from the initial phase and respond to grievances and complaints. However, there are companies that do not comply with CSOs, especially small and medium ones.

Our research detected 4 types of engagement approaches at local level that companies use:

1. LLAs local government and mining companies; however, these agreements are not transparent;
2. EIAs (environmental impact assessment) consultation; our research indicates that the participation of community is very limited.
3. Participatory environmental monitoring: co-implemented by company and local community (e.g. Oyu-Tolgoi) and was effective in building trust; this type of engagement is practiced only by 1-2 companies;
4. Complaints and grievances mechanism: some companies have formal mechanisms to receive and address complaints.

The flow of information to the local community is low. Most affected local people do not get accurate information. Companies' PR focus on tax payments and contributions to the country's economy, but do not provide information that local community request or need.

#### **4.8.2 Public perceptions and related risks**

The qualitative research reveals that negative mining perceptions are shaped by adverse impacts of irresponsible mining on land and water as well as non-compliance with LLA commitments. Environmental degradation made their trust in mining to fall. In this regards, a fear among locals is high, and thus they reject any type of mining and exploration in their soums. Local people are becoming knowledgeable and very cautious, cases of bribes force local people suspect the local government officials. Misinformation, inaccurate or incomplete information leads to mistrust and negative attitude towards mining and exploration activities.

Local people are upset and reject mining due to the reasons that mining activities are started without the consent of local people, mine pits and dumps abandoned without rehabilitation, and CSR is not implemented. There is a fear among local people that adverse environmental and social impacts induced by irresponsible mining operations in neighboring areas would be replicated in their soums. There is a little trust in mining companies and mining administrations. Local people tend to trust when information is provided by local government and local credible person, e.g. teacher. Local communities are also upset that mining companies pay attention only to the people in mining area.

Due to irrelevant and insufficient relevant information local people suspect that local government officials have taken bribes and supported mining companies, thus companies do not comply with environmental requirements. This results in negative perception, and therefore, all mining related activities, including exploration, are resisted by locals. Local communities perceive that exploration will be followed by mining and reject them.

Misleading information and politicized messages can be distributed because of other interests. When a mining scandal is raised in the society, negative perceptions are deepened and communities become more resistant while a part of the population is tired of this information boom as they cannot distinguish right or wrong of the information, and thus it can lead to even more limited community engagement.

Exploration has been decreased due to the local rejection which was influenced by negative perceptions shaped by adverse impacts of irresponsible mining.

#### **4.8.3 Factors influencing the community engagement and outreach**

##### **Information related:**

**The general public is more exposed to the negative discourses.** Mining related news and information is dominated by conflicts and irresponsible operations instead of providing a balanced information which would include the economic benefits of mining.

**Lack of reliable information and information sources at the local level.** For local stakeholders, it is hard to distinguish between trustworthy and false information. The information comes from multiple channels, including social media. Additionally, most local people obtain information from local governor, CRK members or family or friends who can be not fully trustful and neutral since they are individuals. In general, community outreach is limited to CRK meetings which has only few people. It is not effective dissemination and engagement.

**Lack of factual, precise information leads to the spread of misinformation through word-of-mouth.** Local people lack knowledge and information on mining such as who are the beneficial owners of mining companies, what benefits they bring to the local development and what are associated risks, and how companies address those risks, etc. Negative information regarding the environment and corruption spreads through word-of-mouth without recognizing that there are responsible and irresponsible mining companies.

**Disinformation.** As mining is an industry where big interests are affected, the information from one channel might serve its interests rather than being accurate. Thus, the flow of information for the local community is low. The information and communication will be healthier only if the local people who are most affected get accurate information.

**Balanced information is missing among stakeholders.** Training feedback survey from 3000 participants/herders' organized by MERIT, show that main reason of the prevailing negative perception is insufficient and conflicting information. Due to inaccurate and insufficient information flow from companies, local government has been criticized by local people for supported mining companies and having negative environmental impacts. Balanced information and engagement will enable stakeholders to come together, including representative of MMHI, Ministry of Nature, Environment and Tourism (MNET), company, local gov, etc.

**Open data is not used by community and government institutions.** Information on licenses and state-level researchers are available on the websites of relevant government agencies. Moreover, EITI has produced accurate and disaggregated 150 types of data for 13 years. Unfortunately, this rich data is not accessed by the general public. Even the government does not use the data for its planning and policy.

**There is a gap in information supply and demand.** Higher-level organizations do not know what specific information local people want from mining companies, the company's and local authorities also do not aware. Companies report tax payments and contributions to the country's economy. However, this type of information is not so relevant for a herder affected by the mining. Herders want

to know more about pastureland, roads and water related information.

**The general public is tired of excessive disorganized information.** In some cases, the general public is tired of too much disorganized news, especially those circulated via social media and word-of-mouth. Some local people are hesitant to give surveys related to mining, especially in Umnugobi. It can also result to misunderstanding of the whole sector among the general public.

**Misinformation harms local people, bringing benefits to few.** There are cases of how misinformation stir public opinions in a different direction. For instance, *Friendship Resources*, a coal company in Dalanjargalan soum, built a kindergarten with a donation of MNT 800 million. The local people understood that it was built by a member of parliament elected from that area.

**Communication related:**

**Inappropriate way of communication:** In some cases, company representatives use inappropriate statement and messages in communication that can induce misunderstanding and deepen negative perceptions. For instance, an exploration company employee told a herder “if you resist our exploration, your child money might not be granted”. It led to higher resistance from communities as mentioned by one of the interviewees.

**Poor communication and coordination between local stakeholders.** In many cases, companies provide information to aimag and soum government, but then the information never reaches bagh governor or bagh community. Thus, the information dissemination is lost when the reports left in somebody’s desk, not distributed and stakeholders miss important information and activities.

**Local stakeholders’ capacity related:**

**Lack of human resource at the local level.** Despite significant mining-related issues and resistance, the Ministry of Mining does not have local level representation. As local administration staff has multiple tasks, they are not able to pay full attention to the mining issues. For instance, a mining specialist working in aimag government also works also as a secretariat for the EITI sub-council.

**Lack of communication support to local government from national government.** Soum and bagh governments lack of understanding on what information to disseminate, how to disseminate it, and how to engage stakeholders. There is no stakeholders communication strategy or policy. Local officials benefitted from donor facilitated stakeholder engagement process and workshop where they received knowledge and significant support how to engage with stakeholders. Their motivation increased as a result of collaborative learning process and action.

**Regulatory framework related:**

**Lack of local level power to influence decision-making.** Local government cannot influence decision in mining and exploration related issues. According to renewed regulation their duty is limited only to the discussion at the CRK meetings.

**Insufficient time for collecting feedback for EIA.** The number (up to 30 working days) of day for collecting feedback on EIA from communities and providing response back to national Government is insufficient, and it complicates local government and community relationship.

**Lack of transparency in licensing procedure.** Lack of transparency create mistrust among the general public, and rejection from local communities.

**Insufficient coordination of government institutions.** In some cases license area is too close to the herders’ winter and spring settlements due to the lack of coordination between the land management and cadaster departments. Additionally, regulations on resettlement and compensation are not enforced and practiced.

### **Company's corporate governance related:**

**Local employees of the company lack decision making authority.** In most cases, local relations and environmental units/teams are considered as supporting team, thus are not authorized to make decisions. Small and medium companies appoint one person responsible for environment, community relations, and health, safety and environment (HSE). This person has no power to make decision, but communication with local people would require decision making at some point, otherwise it won't go further.

### **Human resources related:**

**Insufficient and untrained human resources.** Professional human resources of community relations are not recruited, and/or training of those personnel is poor in Mongolia. Company representatives working with communities are not trained in community relations, they only base on their field experiences. Predominantly, environmental specialists are engaged in local cooperation, but they are engineers. Even they are good at engineering, they can have poor communication and presentation skills. Moreover, social issues are raised very often during local meetings facilitated by environmental specialist. In this regard, the related personnel should have adequate information and knowledge about the company policy, management and finance, as well as a power to make decisions to respond to the local demands/complaints.

### **Local level (cooperation) agreement related:**

**LLAs are not often disclosed.** Many local government do not disclose the LCAs, even though the law requires it. The information that local people are most interested in can be found in those agreements. Unfortunately, according to the EITI 16th report data, the provinces with well-developed mining are behind on disclosing their agreements. On the contrary, Selenge, Bulgan, Tuv, and Zavkhan aimags have disclosed their LCAs.

**Lack of understanding on how to develop a good LLA with a mining company.** Local officials tend to use the same template. Company signs the agreement only for getting approval. Thus, it produces very superficial agreement which does not reflect local needs and interests.

#### **4.8.4 The most Commonly used Communication tools at soum level**

Based on the QDs at national and local levels, the most popular and effective communication tool at soum and bagh level were identified as Facebook group chat, social media posts, sms and bagh meetings. For example, artisanal and small-scale miners receive information from ASM umbrella association via social media.

Although social media and group chats are the most effective for distributing announcements and short information, face-to-face communication, such as meetings and workshops, are considered to be more reliable source of information.

Newspapers could be effective for targeted audience.

#### **4.8.5 Good practices of community engagement and outreach**

**Participatory water monitoring:** Engagement and trust can be built through participatory monitoring programs, which are practiced by several companies, such as OT in collaboration with *Steps without Borders* NGO. This type of participatory activities is effective as it enables third-party monitoring, engagement of local people, and trustful reporting.

**Successful Local Cooperation Agreement:** There are companies that actively engage with communities and reflect their needs in the LCA. For instances, Buregkhangai soum (in Bulgan aimag) authorities are active in engaging people and companies through the development of LCAs.



**Mutually beneficial and collaborative engagement:** It is extremely difficult to bring many people at once in the rural areas. MERIT project, in collaboration with local government, organized an Open Day in soum center covering important public services, including civil registration and health services along with mining information. But it proved to be a “win-win” opportunity for the company, the local government, and the local people as it was combined with government services. Different information points and workshops were organized at the same time. A total of 500 people (in a repetitive count) gathered for two days, and 250 people received civil registration services. It aimed to ensure engagement of different social groups. For example, high school students were invited to the event, because they will be future decision makers.

**Information provided by professional staff is more trustful.** During the above mentioned open day, the local water specialist provided information on the quality and the quantity of water, and how the government monitors the water level which people found as trustful information because it was delivered by a government specialist.

**Early informing of mine closure.** When mine closure is planned in collaboration with a community, it reduces closure costs and builds trust among people. The general public has negative perception of mine closure because of the abandoned open-pits of previous mines.

**The needed information.** Since job and procurement information is most needed, companies held events and exhibitions in the regional conference in Umnugovi to provide information on job and procurement, and collected job applications.

**Supporting local procurement via data management.** In 2022, EITI added data on products such as meat, milk, vegetables, and honey purchased locally. Based on that data local government departments could negotiate with the companies for the community to have a business.

**Capacity building for engagement, LCA development and monitoring.** The Open Society Forum is engaged in building capacity for LCA making since 2014 through trainings in local areas, and posting guidelines and brochures on their websites. Additionally, it has developed tools for monitoring LCA implementation and collaborated with local NGOs on it. It is also engaged in disclosing mining related contracts such as state-owned company procurement contracts.

**Targeted dissemination.** The EITI Secretariat published two issues of the "Transparent Province" newspaper to disseminate balanced and reliable information on mining to local people. The first issue focused on Dalanjargalan soum; 300 copies were distributed through *Step Without Borders* NGO. The second issue focused on Erdenetsagaan soum, Sukhbaatar aimag, and 1000 copies were developed and distributed to the local people with the *Nutgiin Zuvlul* NGO initiative. Demand for the newspaper was evident, but obtaining information from local authorities was challenging.

**CSOs role is essential.** Mongolia has achieved 70 points, a moderate overall score in implementing the EITI Standard. CSOs' role achieved the highest score. EITI sub-councils chaired by deputy governors of aimag vary in their operations. Sukhbaatar aimag's sub-council is the most efficient, as the CSO operating there (*Ikh Baga Bayan Sharga* NGO) makes the government and companies accountable.

#### **4.8.6 Local context**

As mentioned in the Chapter 3. Research Process, a part of QDs were held in two of the three pilot soums of Making Minerals Valuable project of AMEP2. Each soum has own special characteristics of geography, socio-economic conditions, and cultural aspects. The similarity of the soums mostly refer to extensive mining activities, both large-scale mining and ASMs. The details of each soum context are described in the boxes below.

*Box 4 Khuld soum context*

**Khuld soum**

The people of the soum are proud of the natural beauty of the local flora, fresh groundwater, and unique formations of the nature. There is a cave with an ancient history near the mining area. Also, it is warm in winter and there are many rare animals. Local people have low mutual trust. There is common jealousy towards families located in the mining impact zone perceiving that those families receive higher benefits from mining companies. Local people have closer relationships with the bagh leaders.

Before the development of ASM in the soum around 2015, the population was decreasing as the local people moved to the aimag and neighboring soums seeking jobs (e.g., there were 3 students in one class in the soum school). Since ASM developed, the population and the number of school children grew.

However, since ASM has been restricted, the rate of unemployment has increased and the most of the youth has moved from the soums. Another reason for this movement is resulted by poor education system which is not supported enough by the local government.

Satisfied with the new ASM bylaw as it enables full exploitation of the deposit to an ASM Partnership if its operation complies with the law (by the time of field research, the new bylaw had been introduced to the local stakeholders via workshop). ASM Partnerships gathered in the aimag and elected the leader.

Khuld ASM Partnership worked on environmental rehabilitation and creation of offset, disposal management, tree planting, and contributed to the rehabilitation fund. They produce equipment on their own and hope this can contribute to development of small enterprises in the soum.

*Box 5 Buregkhangai soum context*

**Buregkhangai soum**

Buregkhangai soum, compared to other soums of Bulgan province, is characterized by abundant mineral resources, wildlife and beautiful nature with a combination of mountains, forests and gobi landscapes. This soum has many well-known and state honored people. Especially, it is well-known for Dandar the Hero, a historical figure born in this soum. All public organizations are named after any of those famous people. Buregkhangai soum also made traditional sports (Eriin Gurvan Naadam), especially archery as a local brand sport. The youngest archer is 6-7 years old. In summer 2023, Buregkhangai soum will celebrate its 100<sup>th</sup> anniversary and is already preparing for this big event.

It was the first soum that connected to infrastructure (paved road and electricity) in Bulgan province. Abundant mineral resources have brought mining development, which has both positive and negative outcomes. The positives outcomes include increase in employment rate and income, and in overall local economic development. The negative outcomes are mainly related to adverse impacts on the environment.

Currently, more than ten mining in addition to another ten exploration activities are running, mainly related to gold. As the QD participants said, companies are different in terms of social and environmental responsibilities. Local small companies have closer and emphatetic relationships and collaboration with local government and the communities while big companies fail to implement environmental rehabilitation and fulfill their social commitments agreed during the local approval negotiation. Local government and communities are dissatisfied with thos companies for the reason of failure in providing social benefits to the soum, but having extracted high quantity of minerals (gold) with advanced technology and equipment. They beleive that if bigger companies fulfill their commitments agreed on CSR agreements, such as infrastructure and construction development, companies would be perceived and accepted more positively by local communities.

Local people tend to be more assertive on fighting with mining operations within or close to their worship areas. For example, when a company called "Nomadic Group" started mining in the summer of 2022 on the slopes of a mountain worshiped by local wrestlers called Bürgad Khaikhan, the herdsmen fought throughout the summer and the "Nomadic Group" company did not work in that area.

## 5 Gap analysis

Based on analysis of the SLR and findings of the KIIs, the gap analysis was conducted to compare actual performance with potential or desired performance (target). It seeks to identify elements of effectiveness and sustainability that are not sufficiently represented in the reviewed materials using the frame below.

Remedial actions were elaborated as policy recommendations for the development of more effective and innovative communication and outreach strategies for extractive sector in Mongolia.

Findings of SLR and qualitative discussions were assessed according to three categories of community engagement approaches (Transactional, translational, transformative) to identify the gaps, and a desired model or outcome.

### 5.1 Community engagement and outreach

Community Consultation in EIA is required by the law. This is an opportunity for local community to voice their concerns and views.

*Table 11 Gap analysis matrix for community participation in EIA of the mining project*

Objective	Current state	Desired state*	Gap identification	Gap description	Remedial actions
<b>Community Participation in Environmental Impact Assessment (EIA)</b>	Not informed	Informed in advance/early engagement;	Lack of communication	Few people get notified about upcoming consultation	1. Inform the larger broader community well in advance and set up a date when most people who are likely to be impacted by mining can attend.
	Informed later	Consulted;	Lack of information	Short notice	2. Disseminate information using different channels, invite and encourage people, follow-up
	Not consulted	Opinions reflected/ feedback provided;	Uncertainty on impacts on the pasture and water resources	Not convenient time	3. Request mining companies/EIA companies to prepare their introductions in lay language for distribution to local people
	Consulted, but opinions not reflected, or considered	Concerns discussed and addressed;	Lack of addressing the concerns	No sufficient time to digest information, reflect upon	4. Distribute the most relevant issues of EIA well in advance, so people have time to read, digest the information, make some checks, and able to provide constructive comments.
	Concerns are not addressed	Plans developed collaboratively	The community has low or no trust in mining companies		5. Allow people and herders to provide comments in writing if they cannot attend the meeting.
	Not involved	Step-wise longer consultation	No relationship-building and maintaining		6. Involve impacted /or likely to be impacted herders and citizens
		Equal participation			

<b>Community Participation in Local Level Agreement</b>	No consultation on the development	Awareness on employment or local procurement opportunities	No communication and consultation in development and implementation	LLA are not available for communities to see it, get a copy	Make LLAs open, Monitor the implementation of LLAs
	No participation in the implementation	Know what Infrastructure development is planned; how does it benefit to community.			Get feedback from local people
	No information and monitoring on the implementation	Know what are plans for environmental protection, improving environment			Involve local people in implementation of the plans wherever possible Use independent mechanisms to engage the community in implementing LLAs

## 5.2 Mining companies' approach to engaging with local government and local communities

*Table 12 Gap analysis matrix for community participation in EIA of the mining project*

Objective	Current state	Desired state*	Gap identification	Gap description	Remedial actions
<b>Local Level Agreement</b>	Signed with the Local Government using the national government agreement sample	Companies' contribution goes to support to local development agenda	No information sharing on LLA making, their terms, what are the obligations and rights of signed parties	Local-level (cooperation) agreements are not available online	Make it available online with the possibility to download and print
	Not transparent process	A long-term community development program is included		Not easily accessible	Inform implementation progress, and invite local people to meetings when LLA discussed
	It is not clear if LLA are tied to local development strategy or plans				Include community's priorities in the LLAs

<p><b>Corporate Social Responsibility</b></p>	<p>Make donations</p> <p>Provide scholarships</p> <p>Support small activities</p> <p>Not involved in local development</p> <p>Reports on taxes, fees paid and donations to local Government</p> <p>After permit approval mostly do not meet with locals</p>	<p>Better understanding the needs of communities</p> <p>Contribution to local development based on priorities of the local people and soum development plan</p> <p>Participatory monitoring Citizen science<sup>19</sup></p>	<p>No direct communication and relationship of mining companies with local communities</p> <p>Information is shared with local Government</p>	<p>Promote themselves as responsible company by engaging media</p> <p>Expect local Government to share their information with local communities</p>	<p>Have a community engagement/public consultation policy in the corporate management plan</p> <p>Develop a collaboration plan in discussion with local herders/community</p> <p>Authorize employees to make decisions related to addressing community environmental concerns</p> <p>Recruit person with relevant degree to communicate and establish relationship with local community and Government</p> <p>Organize participatory monitoring activities</p> <p>Organize various community events: Less structured, informal, "Get to know each other" event,</p> <p>Educational, awareness raising events among youth on topics such as mine cycle, processing plant operations and environmental management.</p>
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<sup>19</sup> A process by which the public can participate in scientific research, for example, by providing collection samples.

## 6 Conclusion

Mongolia has all types of mining companies on the spectrum. While few large mining companies have adopted human rights approaches and successfully implement community development programs, there are many medium and small companies who lack understanding of community engagement, some have limited institutional capacity to manage community relations while still trying to comply with legal requirements, and there are companies whose irresponsible behaviour damages the whole industry reputation. Local governments and local communities face a huge challenge because they see both, responsible and irresponsible mining.

The assessment concludes:

Incompliance to environmental standards (abandoned mine sites and open pits; water, soil and air pollution; degraded pastures, etc.) and LLA commitments are the main reasons for negative public perceptions towards mining; and rejecting all extractives related activities such as mining and exploration.

Local people in mining areas are interested in employment opportunities, supplying goods to company, infrastructure development, environmental and water resources protection.

Lack of communication and lack of reliable, accurate information are the missing links for effective community engagement and outreach efforts.

Community participation in EIA and LLA were minimal, with few exceptions where community engagement and involvement was high.

Soum-level stakeholder sub-council, participatory monitoring and transparent LLAs are elements of effective community engagement and outreach efforts.

Key messages focus on providing jobs and procurement opportunities, financial support in social services, and investing in local development as well as implementing Environmental Management Plans and LLAs. Only few companies provide evidence on community engagement and only few outreach materials for local communities are available on companies' websites.

All stakeholders agree that disclosure of information at all stages, from the issuance of mining licenses to the closing of mines, is the best way to build understanding with citizens and their participation.

# 7 Recommendations

## 7.1 General recommendations for innovative priority engagement and outreach strategy

Recommendations that involve elements contributing to collaboration, trust building, improved understanding, resolving emerging community concerns, and relationship establishment:

### **Prioritizing Face-to-Face meetings:**

Verbal communication, dialogue and conversation is the most effective way to establish relationship and building trust with local community, in particular with herders. It is a way of showing respect, acknowledging their rights, showing your interest, listening to their needs and views, understanding local context and demonstrating company's commitment. In person meetings will be a starting point for next step which would include planning and agreeing on next steps.

Develop collaboration that support local community's business, livelihood; implement projects with communities in improve pasture environment, land, improving access to rehabilitation, water resources, collecting water.

### **Creating platforms and avenues that provide reliable, accurate and relevant information**

Reliable and timely information is essential element for communication and successful engagement. These could be:

1. Interactive workshops or meetings where local government, mining companies introducing their plans to communities and communities can ask questions and share their views.
2. Educational mine site visits: local people would be interested to see mining technology and how does company reduce environmental impacts.
3. Inviting people from other soums with good practice and ask them to share their experience or visit their soums and learn from them
4. Informal information/educational session on topics of interest: e.g. mining basics, local biodiversity, effective engagement, human rights, conflict management (2-4 times a year)

These events are a reliable source of information, it provides opportunity to ask questions and get answers, opportunity for all participating to learn from each other, see different perspectives and building a common understanding.

### **Creating no (low) cost, simple information communication and sharing ways at local level:**

1. Local community info station: water well station, grocery store, emerging coffee shops in soums can be used as information dissemination, information exchange points.
2. Monthly / Bi-monthly mining info session: a local soum governor's office, mining companies jointly organize this information sharing session
3. Local level event : Open mining day combined with government social services.

### **Co-learning and trust building opportunities:**

1. Participatory environmental monitoring: a good trust-building process that helps companies to effectively engage with communities. *Resources are available, contact: Steps Without Borders NGO*
2. LLA development and monitoring: LLA should be discussed locally, sub-council could lead the process. *Resources for LLA development and monitoring are available, contact: Open Society Forum.*

## **Ensuring stakeholders' participation and transparency: making a path together:**

1. Setting up a a stakeholders sub-council in the soum, and develop internal rule for how the council work. Local stakeholders need to discuss and agree on how and when to meet, identify priorities, develop a plan of action collaboratively. It is a process that will be shaped and driven by local stakeholders. This process will eventually lead to better understanding of each other, building relationships. Identify community needs and define areas where companies can support. Develop collaboration that support local community's livelihood. For example, implement projects with communities to improve pasture land, develop participatory environmental monitoring, improving access to water for livestock. Organize meetings with a clear objective, during appropriate time with relevant people.
2. Engaging local journalists. Local journalists are local resource people, with a training journalists can be catalysts to reach out a broader community.
3. National level extractives events (e.g. Mining Week): Include more participants from soums, both soum officials and community, including herders. In 2022 Mining Week only 10 soum governors participated. The total number of participoants was around thousands. The most important local stakeholder, communities did not invited to attend the forum. Use National Mining week as a platform for discussion to bring local relations step forward towards long term community engagement.

## **Encouraging bottom-up approach:**

Several projects are active using their own approaches. Collaboraton triggered by facilitation and encouragement of bottom-up initiatives is missing in Mongolia. Ideally, a large-scale social initiative should be raised from the root. It would be more impactful if donors are involved in supporting and co-funding of local initiatives.

## **7.2 Stakeholder specific recommendations**

### **To national and local Governments:**

Apply a human rights-based approach in mining community engagement policy development, communication, and implementation

1. Improve information transparency and availability
2. Make current LLAs available, e.g. E-Mongolia platform
3. Promote through policies mining company and community collaboration
4. Revisit current EIA consultation policy: EIA community consultation timeframe is too short time for anyone to provide feedback. E.g. some plants, or water courses might need to be monitored for certain time in order to be confident about the proposed remedial actions. International experience suggest that EIA approval process takes 1-5 years, or even more depending on many factors, e.g geographical area and ecological viability or sensibility. Providing a reasonable tmeframe (3-12 months) for EIA consultation would be beneficial for both, mining company and community in Mongolia.
5. Strictly enforce law to improve environmental performance of mining industry (irresponsible mining companies).

### **To extractive sector:**

1. Respect human rights and integrate them into corporate policy
2. Understand the local community's needs and priorities, develop a community development long-term plan within the company's strategic plan



3. Empower employee to make decision and allocate funds to implement the decision
4. Comply with environmental requirements
5. Disclosure of relevant and accurate information to local community
6. Get to know your community: visit households in impacted area, have informal meetings, let people know your contacts, have a meeting when requested or needed.
7. Distribute printed information sheet for local communities
8. Update the official websites and social media pages: post information on receiving complaints, vacancy and procurement announcements and publishing digital newsletters/newspapers and magazines for local community, provide reachable contacts.

**To local communities:**

1. Demand disclosure and participation in LLA
2. Request and involve in participatory environmental monitoring
3. Monitoring of environmental rehabilitation of mining companies in the area
4. Participate in meetings with mining companies
5. Initiate projects for local and community development to be included in LLA

**7.3 Further research suggestion**

1. Research on understanding the challenges that mining and exploration companies face to comply with government regulations.
2. Research on understanding of local Government challenges to facilitate community participation and involvement in mining projects in the area.

# Annexes

## Annex 1 Qualitative discussion participants

Types of organization	Interviewed	Attempts	Names of the organizations attended KII
<b>National level</b>			
Government	2	Official letter via e-mail Phone call	Department of Geological Policy, MMHI Public Relations Department, MRPAM
International organizations	2	Official letter via e-mail Phone call	D2D (Disclosure to Development) Program, IFC MERIT (Mongolia: Enhancing Resource Management through Institutional Transformation Project) Project
Non-government organizations	2	Official letter via e-mail Phone call	Open Society Forum
Associations	1	Official letter via e-mail Phone call	Mongolian National Mining Association (MNMA)
Multi-stakeholder organization		Official letter via e-mail Phone call	Extractive Industry Transparency Initiative (EITI)
Mining companies	2	Official letter via e-mail Phone call Sent official letters to 8 out of 34 companies identified with 1 response	<i>Khos Khas LLC</i> , which has mining operation in Buregkhangai soum <i>Monpolimet LLC</i> (contacted through personal channel)
Media organizations	2	Official letter via e-mail Phone call	<i>Mining Insight Journal</i> <i>Mongolian Mining Journal</i> / <i>Mining Review</i> newspaper
<b>Local level</b>			
Government	2	Official letter In-person meeting	Soum Governor Deputy Soum Governor
Local NGOs/Active community member	2	Official letter In-person meeting	Representative of the Citizen Representative Khural
Citizens and herders	2 FGD	Official letter In-person meeting	Citizens and herders
Observation	2	Field visit	Soum center and herders' surrounding area
<b>Total number of interviews conducted - 17</b>			

**Researcher's note: Buregkhangai soum, Bulgan aimag**

Activity	Target	Implementation	Researcher's note
<b>KII</b>	Local government - 1 Community key person/NGO - 1 Mining company - 1	Local government - 1 Community key person/NGO - 1 Mining company - 0	Soum governor (Badam), and a representative of the CRK (well known for information spreading and sharing in the soum) attended the key informant interview. The soum governors and others set out a list of mining companies that are operating actively. Unfortunately, during that time none of the mining companies was operating at the site.
<b>FGD</b>	Local citizen and herders - 8 participants	Local citizen and herders -7 participants	Most of the local people had joined the ASM Partnerships by 2021. Some partnerships recruited close relatives to complete their membership in accordance with the related regulations. Most participants of the FGD were randomly sampled, and those participants were somehow connected to the ASM Partnerships. The FGD involved 2 people from rural areas and 5 people from the soum center.
<b>Obs</b>	Field observation - 1	Field observation - 2	The observation was conducted around two herder households in a soum center and a bagh area with extractive activities. There is a mine and a concentration plant 2 km away from the winter settlement of one of these herders. Several documents were collected (e.g, soum governor 2021 program implementation report, soum level EITI report 2014, Governor's 2020-2024 program, and its implementation report)

**Researcher's note: Khuld soum, Dundgobi aimag**

Activity	Target	Interviewed	Researcher's note
<b>KII</b>	Local government - 1 Community key person/NGO - 1 Mining company - 1	Local government - 1 Community key person/NGO - 1 Mining company - 0	The Deputy soum governor (The soum governor has been recently appointed, thus he had low understanding about the research theme) and local citizen Erdenebaatar (well-known for information sharing, and spreading in the soum) attended KII. The representative of the mining company was not present at the time of fieldwork, so contact information was obtained. Most of the local people extracted mine through ASM partnerships. According to the latest resolution of the Government, the former artisanal miners had to attend the certification training (organized by the ASM umbrella association) at the provincial center. The soum governor is planning to give the certificated small-scale miners the right to mine near the mining site of the Golden Sunrise company, which is active in the soum. The population of the soum has decreased since the governor of soum stopped artisanal small-scale mining. The company has good working relations with the local administration, and provides financial support for public competitions, contests, and celebrations organized by the local administration. There is no communication and relationships between the company and households/people outside the impact area and/or other <i>baghs</i> .
<b>FGD</b>	Local citizen and herders -8 participants	Local citizen and herders - 7 participants	The participants mentioned that most of the local people were members of any of local partnerships. Additionally, local people do not have information about mining companies. The further away from the mine, the less information and understanding the citizens have about mining companies operating in the soum. There are 4-5 families in the mining impact area of the above-mentioned company, and the company provides financial supports to those households, such as sending to a resort, buying meat products from them, and providing goods when the winter is severe. However, other families of the same bagh are dissatisfied as they do not receive have any support. In order to reduce this dissatisfaction, the company distributed blood pressure monitors to all the households of this bagh.
<b>Obs</b>	Field observation of - 1	Field observation - 2	Rural herdsmen mentioned the lung disease of animals caused by dust. They perceive that that the soum began to develop after local people started engaging in ASM activities. It is believed that theunemployed started earning income while the employed generated additional income. The number of the soum population started to decrease since ASM permits were not allowed.

## Annex 2 SLR PICOC analysis of Mongolian experiences

No	Author(s) Article title	Population	Intervention	Comparison	Outcome	Context	Participati on level <sup>20</sup>	Considerations in analysis
1	Tuvshintugs Batdelger et al, 2022 "Impacts of mining on local livelihoods and Social Licensing in Mongolia"	Local community in Gurvansaikhan soum, Dundgobi province. Erdenes Silver Resource LLC, a subsidiary of Erdenes Mongol LLC (a state-owned holding company)	The most important and widely used tool when evaluating SLO is the Social Acceptance Survey. Case of Erdenes Silver Resources	Assessed the respondent's perceptions about the impact of mining on social infrastructure contact quality and quantity with personnel from the mining company, procedural fairness, trust, and overall acceptance.	Although many mining companies operate in Mongolia, few make efforts to obtain an SLO. Most of companies don't provide enough information about their operations to local communities. Mining companies in Mongolia do not have a good understanding of SLO. 64% of the study participants rated themselves as unaware or very unaware of the mining company which indicates that the company didn't establish relationship with local people and no information provided. Respondents rated the frequency of contact with Erdenes Silver Resources an average of 1.2 points, and most respondents answered that they had never met with the company's employees or representatives. Most respondents rated the impact on each social infrastructure item 3 points (not changed at all). Erdenes Silver Resource had no significant impact on the social infrastructure of Gurvansaikhan Soum. The participants' level of trust was 3.5 points. Although the company does not hold public meetings or provide information on its activities, the level of trust was above average. Why? This may be due to the company's relation to the government's decision to cancel pension loans and	The number of arbitration cases (between the local community, mining company and local government) in Mongolia was 41 in 2014, 70 in 2015, 58 in 2016. In this study two large mining companies, Oyu Tolgoi and Gatsuert Gold Mine conducted Social Impact Assessment (SIA). SIA assesses positive and negative changes induced by mining activities, and to improve outcomes for affected communities. These include infrastructure, employment, access to water and land, welfare.	In many cases almost no participation Few cases Informing	Recommendation: Increasing public participation in decision-making processes is crucial to improving SLO in the mining sector.

<sup>20</sup> According to the spectrum of Community Engagement: *Informing, Consulting, Involving, Collaborating, Empowering*.

No	Author(s) Article title	Population	Intervention	Comparison	Outcome	Context	Participati on level <sup>20</sup>	Considerations in analysis
					distribute money to the elderly who do not have loans.			
2	Lavdmaa Dagvadorj et al, 2018 Effects of local community's environmental perception on trust in a mining company: a case study in Mongolia	Local community, nomadic herders	The residents' perceptions of the company's effort to maintain environmental protection, motivation and ability as determinants of trust.		The company's effort to maintain environmental protection was seen as one of the key determinants of trust towards the company by herders living close to the mine; whereas herders living far from the mine operation had neutral perceptions and people living in the towns had high trust in mining companies Formation of the positive or negative community perceptions is influenced by the company's communication ability. Low trust likely leads to conflicts. Therefore, it was advised that companies conduct surveys with different groups in the local community, especially those who are sensitive to environmental changes and take appropriate measures. The trust level varied within the different respondent groups and the determinants of trust differentially explained the state of trust.	The first determinant is motivation. Trust is formulated based on the perception of fairness. The second determinant is ability, which is related to the knowledge and intelligence and expectations of technically competent performance.	Informing, consulting	Mixed method. Qualitative data: What does company A quantitative question about information communicability of the company investigated whether the company provides information to the local residents about the mining operation, the company's activities in the area, and monitoring of environmental contamination and rehabilitation. The response options included not at all, rarely, seldom, often, and quite often.
3	Altanchimeg Zanabazar, B. Battuya, 2019 "Current status of Social Responsibility	Mining companies	Community relations	85 mining and equipment trading companies in Mongolia	CSR concept is not well understood by mining companies, 80 % of companies (participating in the study, registered with Mongolian Chamber of Commerce and Industry) do not implement CSR, in overall CSR is very low.	Standards available, but not applied ISO 26000, IAS, IFRS, EITI ISO 14001, ISO 19001, OHSAS 18001	Almost zero level of community participation	Responsible mining started since 2006 Responsible mining (RM) definition and RM principles

№	Author(s) Article title	Population	Intervention	Comparison	Outcome	Context	Participati on level <sup>20</sup>	Considerations in analysis
4	Mijiddorj Purevsuren, 2021 "The mining melodrama, case of Gurvantes"	Local community, mining companies, local governments	Incorporated various stakeholder perspectives. The study presents a layered perspective of mining.	CSR of different mining companies. Herders want to protect the rest of the land as they now know what mining does to land and water springs.	This study highlights the recurring issues and slow evolution of good mining community practice. Case study exemplifies the current situation of mining- impacted areas and challenges embedded in the relationship between companies, local decision-makers and herding communities. People are most angry with the first companies because of how they use water, because they do not hire locals and similar complaints. "We don't want to have more companies destroy other lands," the locals say. One herder said: he was admiring the giant equipment and techniques, but never realized how bad it is for the environment and herding; and for health. As the spring water, nature and pasture has been destroyed the damage is irreparable	Gurvantes Soum is located in South Gobi, Mongolia, and presents a microcosm of mining issues in Mongolia. There were no mining in the past, since early 2000 mining rocketed. Currently, 268,708 ha of land or 14.2% of the Gurvantes area are given for mining exploration licenses. There have been at least 27 mining licenses issued and there has been an increase in artisanal small- scale or "ninja mining." Mining clashes with customary herding, the main community livelihood (Marshall, 2001; Sneath, 2006).	Informing. No consultation	A major issue for both, mining and the community was electricity for mining and development. Gurvantes soum imports electricity from China. The Chinese/ Mongolian Chinkhua MAK Company imported electricity to the three soums of South Gobi. The system is prone to breakdowns; if the electricity cuts, it takes a week or more to be fixed.
5	J. Fraser, N. Kunz, 2018 "Water stewardship: attributes of collaborative partnerships between mining companies and communities"	Mining companies, communities	Education for mining companies. Collaborative partnership strategy to promote sustainable outcomes. Question investigated: What attributes of success do	Cases of: Mongolia Peru. Investigated mining- community conflicts in Peru and Mongolia, water being as a key issue.	Collaboration can offer mining companies and other water users potential to deliver both business and social value, and to advance water management. A key part of this program involved convening quarterly round tables to bring together mining companies operating in the region. The goal of these meetings was to improve the water management and community engagement practices of the companies themselves; and to	Number of mining community conflicts between 2012-2016 in Mongolia - 5, in Peru - 17. Scarce water resources have been a driver of social opposition for numerous mining projects in Peru, including Conga, Las Bambas, and Tía	Peru: collaborative engagement: consulting, involving Mongolia: collective action: consulting, involving ?	Critical to engage stakeholders, avoid placing the mine in competition with other water users for clean water. Explored alternative way- the possibility of treating municipal wastewater in exchange for

№	Author(s) Article title	Population	Intervention	Comparison	Outcome	Context	Participati on level <sup>20</sup>	Considerations in analysis
			productive water stewardship collaborations between mining companies and communities share?	The rapid industry expansion has created tensions with local communities that have traditionally relied on animal husbandry for their livelihoods	engage trusted third parties to understand local communities' concerns and to communicate company efforts to address these issues. The water use data has been shared with local community representing a significant step towards transparency. Additionally, participants contributed to the design of a water and mining curriculum for a stakeholder training program. During 2014–2016, more than 1000 people participated in the training.	María.		water for mining operations. Lack of baseline data and effective governance mechanisms create uncertainty that contributes to significant distrust between mining companies and local communities.
6	Byambajav Dalaibuayn, 2022 “Negotiating the co-existence of mining and pastoralism in Mongolia.”	Local community, local Government and companies' relationship	Examines implementation of agreement mechanisms and whether they have helped local communities protect their interests while coexisting with mining. Agreement-making between mining companies and “host” local governments was one of the policy interventions adopted by the Mongolian state.	In Australia, Canada, it is standard practice for legally binding agreements to be negotiated between Indigenous communities and resource companies from the early stages of exploration.	Rights and claims of mining project-affected pastoral communities must be recognized in the local level agreements (LLA) to ensure a meaningful participation of mining impacted communities in agreement-making processes. Mongolia's mining sector has grown significantly in last two decades adding stress to the pastoral economy, However, the pandemic had less impact on traditional livestock husbandry than on other economic activities, highlighting the role of livestock husbandry in ensuring the sustainability of livelihoods.	The relationship between mining companies and local communities has been highly contested. The role of the local community has not been adequately recognized in government mining policy and regulations. Results of LLAs are not so great, although the legal requirement was in place since 2006.	Community's participation is at the lowest level, informing	Oyu Tolgoi's case demonstrates that the negotiation of long-term coexistence of mining and community requires iterative, multilayered processes involving communities
7	Troy Sternberg, Jerome Mayaud. Ariell Aheam,	Herders, rural population	Holistic assessment of the roles of herders, governments and	Impact of mega-mining on the physical and social	Mining and herding can, do, coexist in Khanbogd soum. In the future, with planned mining expansion, herders will face big challenges. A weak state governance, poor environmental	Desert region, local engagement and adaptation to large-scale mining. Unresolved water	Consulting, Involving, towards empowering	An interdisciplinary approach: natural and social science methods applied to understand the

No	Author(s) Article title	Population	Intervention	Comparison	Outcome	Context	Participati on level <sup>20</sup>	Considerations in analysis
	2022 "Herd it in the Gobi: Deserting Pastoralism?"		mines in reshaping pastoralism. Can society and government establish environmental practices and safeguards to support its rural population?	geography of Khanbogd soum.	standards and lack of transparency will translate into significant challenges to cope, manage and address them. It is recommended that attention to cumulative impacts of mining and related infrastructure in policymaking would aid in social and environmental safeguarding. Strengthening local government capacity to manage and monitor development and facilitate citizen participation in decision-making.	access issues continue, this represents ongoing conflict between local herders and OT mine.		dynamics of changing environments.
8	Poscente M, Chojinzav Chultembombo, 2022 "Mine closure plan for the Salkhit silver mine"	Government officials, mining companies, consultants and stakeholders in mining project	Development of a mine closure plan for the Salkhit mine. A regulatory review, site assessment report, development of mine closure goals objectives, a risk assessment. Capacity building and gender equality are key activities for the intervention. Strengthening the mining and environmental sectors governance through revisions and improvements to laws and regulations. A specific objective	Stakeholder engagement plan, identified key stakeholders and effective engagement methods. Key professional stakeholders received targeted, pertinent information designed to inform, educate and assist them to better conduct their mine closure responsibilities related to their roles. Local citizens and herders received information	Consultation guidelines (MERIT 2017) were used to make decisions on the design, monitoring and evaluation of engagement activities. Clear responsibilities defined and distributed among team members and steps undertaken: 1. <u>Regulatory review</u> : identified gaps and contradictions between the Minerals Law and the Law on EIA regarding deadlines for developing and submitting a mine closure plan 2. <u>Site environmental condition report</u> : produced baseline and monitoring data to use for developing closure activities and reclamation strategies 3. <u>Mine closure goals and objectives</u> development: goal 1- reclaimed sites exhibit characteristics and functions close to natural ecosystem state, that support traditional land use type for locals; goal 2- based on mine infrastructure, develop business opportunities to support growth and socio-economic development. 4. <u>Risk assessment</u> : 10 vulnerabilities were defined Capacity building was an important aspect of preparing key stakeholders	A developing nation, classed by the World Bank as a lower middle-income country. A barrier to mine closure planning is a general lack of capacity within the domestic mining industry. The top three capacity issues are improving skills and knowledge of professionals involved in mine closure planning, companies providing adequate resources to meet the closure planning expectations and enhancing the capacity of stakeholders, especially local citizens, so they can meaningfully participate when engagement occurs.	Consulting and involving.  The effort and investment in stakeholder engagement can save money in the long run. Companies lack capacity to conduct stakeholder engagements processes.	Mine closure planning is a new concept for Mongolia. MERIT, MMHI, MET and ESR signed an agreement for the Salkhit mine closure planning project, defining the intent and outcomes, general roles and responsibilities and partner support by either direct investment or in-kind contributions. Stage 1 of the project commenced on 1 September 2021 and was completed on 30 April 2022.



№	Author(s) Article title	Population	Intervention	Comparison	Outcome	Context	Participati on level <sup>20</sup>	Considerations in analysis
			is to improve mine closure planning – by standardising planning processes and improving confidence that land disturbed by mining will have value to local communities after mine closure.,	about mine operations, the mine lifecycle and reclamation approaches.	to meaningfully contribute to the closure discussions. Understanding stakeholder concerns and addressing the concerns early in the planning process can avoid potentially costly escalation of issues. Building strong relationships with impacted stakeholders early in the process, being transparent and seeking stakeholder input into solutions, are important contributors to success.			
9	Enkhbayar Chimedlkha, 2019 “Community perception of a cooperation agreement”	Herders and local communities	Impacts of the Cooperation Agreement between Oyu Tolgoi copper-gold mine communities, and to examine the challenges and achievements of the agreement	Communities and mining company relationships	Local communities generally in favor of the mine because of employment & economic opportunities. The study highlighted absence of effective public discussion, communication between community and the company in the agreement implementation, and transparent process for allocating jobs within the communities. Recognizes a conflict between mining companies and local communities due to the current national policy on land tenure calls for an integrated approach to better protect the rights of both parties.	Oyu Tolgoi Company annually allocates approximately 5 million USD to the Gobi Oyu Fund to support the projects towards sustainable development of South Gobi communities.	Consulting and involving	Case study approach. Five key themes emerged: communication, public perception of cooperation agreement, impacts of employment and migration, water resources and resettlement and displacement.

### Annex 3 SLR PICOC analysis of international experiences

No	Author(s) Article title	Population	Intervention	Comparison	Outcome	Context	Participation level	Considerations in analysis
1	Prno J, Pickard M, Kaiyogana J, 2021  "Effective Community Engagement (CE) during the Environmental Assessment (EA) of a Mining Project in the Canadian Arctic"	Inuit – first nations in Nunavut	Proponent-led CE; Agreement – co-management. Cultural-sensitivity and traditional knowledge; 1.Early engagement and context-specific approach 2.Comprehensive record-keeping and reporting, 3.Meaningful incorporation of community perspectives and TK 4.Long-term relationships, partnerships and local benefits	Higher prioritization of indigenous community; Higher awareness & authority over land/resources; EA process is much longer.	Addressed local concerns; Broad community support, Helped secure project approvals (EA); Effective CE	High dependency on nature and wildlife (caribou) High unemployment, low attainment in education and social services.	Collaborating	Meaningfully involved in decision making? Concerns substantially addressed? Received sufficient benefits from a mining project? Broad community support was obtained? Protests, blockades, legal challenges, interventions? skills and qualifications of the engagement team members?
2	Seloa P, Ngole-Jeme V, 2022  "Community Perceptions on Environmental and Social Impacts of Mining in Limpopo South Africa and the Implications on Corporate Social Responsibility"	Local communities around Limpopo, S Africa	CSR- development projects: human resource, infrastructure, poverty reduction, education.	Negative perception on environmental and social impacts, positive on economic	Expectations on employment not achieved; negative perception is source of mistrust and resistance. CSR should focus on solving root causes or social problems rather than infrastructure development, and monitor the commitments	Prevalence of negative opinion influences on CSR to be perceived as negatively, rhetoric, and further realization of CSR ambitions, and the required collaboration. Social and community concerns are higher than environmental (perceived that life has been deteriorated since inception of mining)	Informing	Role of perception: Stakeholders perception on CSR Factors influencing on the perception – distance from mine, length of stay, age, employment, education. Manifestation of CSR - realized on the ground or just rhetoric? Note: negative perception on CSR influences on lacking implementation – why? Maybe no demand and no will to cooperate from community due to mistrust.
3	Mercer-Mapstone L.D, Rifkin W, Moffat	Study based on stakehold	SLO-increased focus on social accountability that involves inclusive decision-	different from "consultation"	Lack of communication results to negative perception and further	SLO – risk management exercise.	(ideally) Empowering	Company guidelines CE toolkits

No	Author(s) Article title	Population	Intervention	Comparison	Outcome	Context	Participation level	Considerations in analysis
	K & Louis W, 2018  “What makes stakeholder engagement in social licence “meaningful”? Practitioners’ conceptualisations of dialogue”	er engagement practitioners	making. One approach is multi-party (meaningful) dialogue to improve rural governance. 1.A strategic model of dialogue (more structured dialogue with specific goal or outcome) more flexible and responsive to stakeholder needs 2.A learning model of dialogue (less structured free-flowing conversation & co-learning through stakeholder exposure to diverse perspectives) desires specific outcome e.g. reach consensus. Both can be constructive dialogue - prefer symmetrical two-way, linear unidirectional flow/ communication, have potential for personal and social transformation (but rare in practice) as participants perspectives are challenged by others’ experiences.	Consultation was described as driven by a single party, whereas dialogue was based on equality among different parties at the table. Compared with other types, debate, disclosure, negotiation.	dissenting communities.	Effective dialogue - Face-to-face verbal exchange between community and industry representatives. Development of mutual understandings through exchange and co-construction of views, opinions, ideas, information, or <b>values</b>		Local Government mandates  Factors contribute to SLO - Trust, fairness, legitimacy, credibility.
4	Pajera C, Honey-Roses J, Kunz N C, Fraser J & Xavier A, 2018  “What Participation? Distinguishing Water Monitoring Programs in	20 cases in Latin America	Participatory Water Monitoring (PWM), as part of CE. Citizen-led approach on data gathering and analysis – support environmental baseline, inform decision-making, include local knowledge, empower citizens, water stewardship. For companies – identify tensions, facilitate dialogue,	Companies engage stakeholders to prevent from conflicts induced by competition for water, but in different degree depending on how	Assessed extent of community involvement in PWM programs in the mining sector according to the framework for assessing participation in PWM. 1.Externally driven and professionally executed (1 <sup>st</sup> most typical), 2. Externally driven, with local data collectors,	Regular monitoring, safety and risk analysis for addressing possible accidents. water was associated with 58% of complaints. the most appropriate type of monitoring scheme depends on the	Varied degree of citizen involvement. Based on this study, PWM is more informing rather than affecting decision	Citizen science - a process by which the public can participate in scientific research, for example, by providing collection samples. Framework for assessing participation in PWM in mining context: Conceptualization

No	Author(s) Article title	Population	Intervention	Comparison	Outcome	Context	Participation level	Considerations in analysis
	Mining Regions Based on Community Participation”		build trust.	stakeholders perceive PWM. Peruvian legal framework is conducive to the establishment of PWM committees	3. Collaborative monitoring with external data interpretation, 4. Collaborative monitoring with local data interpretation 5. Autonomous local monitoring (2 <sup>nd</sup> most typical). Involving citizens bring faster decision-making in environmental challenges at the operational scale.	need for reliable data, funding, local expertise and interests and need of local knowledge and management	making. Regular PWM could empower citizens in decision-making.	(externally-led, collaborative, locally-led) Collection (local, professional) Interpretation (local, external).
5	Malone A, Smith N, M, & Zeballos E, Z 2021  “Coexistence and conflict between artisanal mining, fishing, and farming in a Peruvian boomtown”	Peruvian artisanal mining boomtown	Artisanal and small-scale mining (ASM) which existed before, considered as native livelihood, and boomed since 2000. Large and medium-scale mining also exist upstream.	The impacts, problems, and social dynamics are common.  Positive perception on economic impacts.	Water contamination and uncertainty over the pollutant (blaming upstream medium-scale mining); impacts on river shrimp and decline in shrimp farming; competition over land for farming and grazing; influx of immigrants who are perceived to have brought social issues (social division, inequality, prostitution, crime, etc) and water pollution from sewage; and impact of social relations and power dynamics on public perception.	Dependency on the river and fishing, livelihoods are mix of subsistence livelihood and wage labor, co-existence of political support for mining and anti-extraction discourses; and common artisanal mining practices.	Informing for communities , empowering for ASM leaders	Social dynamics and power relations; history and previous conflict; perception of ASM among the population; different perception on environmental impacts; economic trade-offs;
6	Kilajiana A & Chareonsudjai P, 2021 “Conflict resolution and community engagement in post-audit EIA	Villagers of Ban U-Mung (mining community)	A study on understanding conflict between a community and a mining project and identifying ways to prevent the conflict through post-audit EIA engagement efforts. Response to the public	Common in terms of probability of risks (conflict) due to lacking information	All heavy metal concentrations except for arsenic were under national soil quality standards and did not change significantly from the baseline. The villagers’ concerns were	Small agricultural community located southeast of Mekong River, between two large iron ore deposits. An open pit iron mine 2 km from the	Involving	Information accessibility and adequacy for community; effectiveness of communication tools; tools and opportunities to make informed

No	Author(s) Article title	Population	Intervention	Comparison	Outcome	Context	Participation level	Considerations in analysis
	environmental management: Lessons learned from a mining community in Thailand”		concern on potential heavy metal pollution in water and soil, samples were collected and tested, and compared to the EIA baseline.		due to a lack of information from the project and let to conflict between those two parties even after post-audit EIA.	village, and prospective three mines.		decisions about future development projects that have direct impacts on community livelihoods.
7	Chawa, A. F. & Grace, M., 2019  “Demystifying power in community development practice”	Mining project in Sumbawa Island, Indonesia.	The company used power to secure its operations as a CSR framework for community development program to mitigate the protest from the local community through two main community development foundations.	Common in terms of financial support to secure its interest and sustain the mining operation.	The community development program resulted unintended results including financial dependency (e.g. unrepaid debt issue, creation of money orientation character, etc.), frustration and resistance of the local community to the company. The company failed to increase community capacity in engaging in decision making.	The sub-districts, where community development programs concentrated, were small villages in a remote area, riding horses and living from traditional agriculture, gardening and raising animals. The mining transformed the villages into a busy district.	Collaborating	Power could be distributed by employing an ongoing and comprehensive assistance model to increase capacity of the community and empower them to have control on their own development programmes independently. Lessons learned from financial support to communities.

## Annex 4 Interview analysis

### Annex 4.1 Experts, professionals in the field

Participant	Community engagement	Good practice	Challenges	Reasons/ causes of no/not effective engagement	Recommendations proposed solutions	Trust, Perception related
1.MERIT Project	<p>Improved stakeholder awareness on the importance of community engagement compared to 5 years ago</p> <p>Mutually beneficial and collaborative engagement</p>	<p>Regular training workshop for locals on mining lifecycle in Dornod since 2018. mine closure is planned in collaboration with community. Local cooperation agreement (LCA) should be made on negotiation with local people, followed by collaborative monitoring. Company sign the agreement only for getting approval for mining. Thus, it produces very superficial agreement</p> <p>Open day in a soum: provision of social services (e.g., health, civil registration) - collected many people at one point and a win-win opportunity for company, local government, and local people.</p>	<p>Different perspectives and views depend on who provides the information. One-time information is not digested and there is no impact. Poor communication and coordination between local stakeholders. Balanced information is missing among all stakeholders</p>	<p>Lack of timely and trustful information at the local level.</p> <p>Poor local capacity and awareness.</p> <p>Community outreach is limited to CRK meetings.</p> <p>Information is not communicated equally to all stakeholders and some stakeholders are left behind.</p> <p>Local officials working on the Agreement has poor capacity. They tend to copy the agreement template from each other, and they have no understanding on which should and which should not be included in the agreement.</p>	<p>Awareness raising should cover broad scope</p> <p>Regular outreach activities to the broader community and collaboration efforts should be enhanced.</p> <p>Announcements can be distributed through Facebook groups. Both formal and informal channels should be used effectively.</p> <p>A mining information center at the soum center is needed</p>	<p>Local people tend to trust more when the information is provided by the local government and teachers.</p> <p>Due to ineffective and insufficient information local people suspect local government officials have taken bribes and supported mining companies that have negative environmental impacts. This results in negative perception, and therefore, all mining related activities, including exploration, are resisted by locals.</p> <p>Mine closure in collaboration with community builds trust among people. The general public has negative perception of mine closure because of the abandoned open-pits.</p>
Participant	Community engagement	Good practice	Challenges	Reasons/ causes of no / not effective engagement	Recommendations proposed solutions	Trust, Perception related
2. D2D Program, IFC	Engagement and trust is built through	Monitoring programs practiced at by OT and in other areas in Tuv	The Government is reluctant in disclosing	Low public awareness on contribution of mining.	Provide relevant data systematically. Data help citizens to distinguish false	Public perception has been shaped by how information is disclosed. There is a purpose:

	<p>participatory environmental monitoring programs. Agreement is form of engagement. There are companies who actively engage and reflect community needs in the Local Cooperation Agreement (e.g. Buregkhangai), it differs case to case. But in many cases, community representation is inadequate at local cooperation agreement discussions.</p>	<p>province by the Borderless Step NGO. Monpolimet has a good practice of rehabilitation</p>	<p>important information. The related awareness raising is challenging.</p> <p>Citizens need to collect the missing data and monitor themselves without waiting for the state to disclose it.</p> <p>Top-down approach is seen as brain-washing; the dissemination should be based on data, and the stories are built up on data. Data-driven consultations are needed.</p>	<p>Only 10 companies pay 80 % of tax income, but small mining companies have no substantial contribution</p> <p>The information is not communicated properly Companies produce a “Fake” mineral assessment to get a mining license</p> <p>Individual company’s PR is not effective.</p>	<p>and right information. Factual, detailed, meaningful and purposeful disclosure focused on solving social and governance issues is needed. Today, journalists collect data and disseminate, but socio-economic and environmental impacts and explanations should be disclosed to the public based on facts. It may effective if a companies’ collaborative PR in the relevant aimag/soum is organized. Capacity building of local opinion leaders, local authorities, politicians, and community relations managers who disseminate information to the public at local level should be trained in data use and presentation skills. Several projects are active now, but they implement interventions on their own, lack of coordination and use their own approaches. Collaboration triggered by facilitation and encouragement of bottom-up initiatives is missing in Mongolia. Donors should be involved in co-funding of local initiatives rather than focusing only on own interventions. Donors should change mind and be a part of more impactful goals rather than leading others in one area.</p>	<p>disclosure has been too superficial and not organic. Negative perceptions turned more negative while a part of the population has been tired of this information boom suspecting it was another politicized message or disinformation. Trust is built through participatory environmental monitoring programs.</p>
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Participant	Community engagement	Good practice	Challenges	Reasons/ causes of no / not effective engagement	Recommendations proposed solutions	Trust, Perception related
3. Mongolian National Mining Association (MNMA)	<p>Companies develop own community engagement program (CEP)</p> <p>Community engagement emerged when western investors entered Mongolian market and citizens started to know their rights</p>	<p>Participatory activities are effective as local community members are involved, identify key environmental baseline. Participatory monitoring enables third-party monitoring, engagement of local people, and enables trustful reporting</p> <p>Responsible mining codex, related trainings</p>	<p>Participatory (water) monitoring is performed in a limited way.</p> <p>Past and recent conflicts, negative economic consequences</p> <p><u>Poor corporate governance:</u></p> <ul style="list-style-type: none"> <li>-employees no decision-making power</li> <li>-poor communication skills</li> <li>-do not recruit professionals</li> </ul> <p>Lack of professional human resources, Lack of training and relevant educational content for mining students</p> <p>Politicized message</p>	<p>Mining development was based on the Soviet culture, where community engagement and environmental issues have been left.</p> <p>Local government has a limited power to make decision.</p>	<p>Establish a knowledge Hub or Club next to the MNMA</p> <p>Promotion of standards:</p> <ul style="list-style-type: none"> <li>-ESG standards</li> <li>-Responsible mining standards</li> </ul> <p>CSO, associations are good mechanisms</p> <p>Increase public awareness of local people on regulations, rights and duties of both, companies and citizens.</p>	N/A



Participant	Community engagement	Good practice	Challenges	Reasons/ causes of no / not effective engagement	Recommendations proposed solutions	Trust, Perception related
4. EITI	The flow of information to the local community is low. Most affected local people do not get accurate information. Companies' PR focus on tax payments and contributions to the country's economy. 1,000 copies were developed and distributed to the local people. Demand for the newspaper was evident.	CSOs role is essential. Mongolia has achieved 70 points, a moderate overall score in implementing the EITI Standard. CSOs achieved the highest score.	Lack of reliable, factual information in the local community leads to the spread of misinformation through word of mouth. Misinformation sometime can lead to mine closure. Obtaining information from local authorities took much work. The local governments should understand that disclosing the information is essential. The newspaper should be a collaboration of stakeholders, with some providing information, some building contents, and some distributing	There is a huge difference between the information provided from the top management and the information needs at the community level. Representation of MMHI is missing at local level. Local governments do not disclose the Local Cooperation Agreements, even though the law requires it. The information that local people are most interested can be found in those agreements.	The company should focus the unique local needs to communicate effectively. For example, in the Gobi region, local people are more interested in information on environmental and minerals transportation issues. Disclosing information on water, jobs, procurement and donations are the most useful, relevant for local people. However, only Dundgovi submitted these information withing the Making Govi region aimags transparent initiative.	Mining is an industry where big interests intersect, and a lot of money circulates. Misleading information can be distributed because of other interests.

Participants	Community engagement program (CEP)	Good practice	Challenges	Reasons/ causes of no / not effective engagement	Recommendations proposed solutions	Trust, Perception related
5. Mongolian Mining Journal	The understanding between local journalists and mining companies improved after MMJ's training workshops for local reporters. It also provides better information to citizens. Local journalists' works shifted to a different level than those in 2010. The changes were seen in newsrooms such as Altangovi TV and Melmii.mn of Umnugovi.	Journalists became more willing to gather information from different stakeholders by visiting mining sites, interviewing various people, and producing more accurate, truthful information. As the local journalists developed and became more knowledgeable, the newsrooms developed, and some started using technological advances such as drones.	Since 2019, Mongolian Mining Journal has stopped its training activities due to Covid-19 and other reasons. As a result, its relationship with local journalists is deteriorating. Companies lack an understanding of effective channels to disseminate information to outreach/engage the local community.	Companies lack an understanding on good governance and effective community engagement.	Newsrooms based in Ulaanbaatar can collaborate with local journalists to produce mining related content and disseminate nationwide. Stakeholders can support local newsrooms and journalists with capacity building programs and training workshops on professional journalism and mining education. Promoting development journalism.	Human-interested story is an excellent way to engage local people by sharing their stories.

Participants	Community engagement program (CEP)	Good practice	Challenges	Reasons/ causes of no / not effective engagement	Recommendations proposed solutions	Trust, Perception related
6. Mining Insight Magazine	Overall awareness on community engagement has increased in last five years. Protests against mining were common in 2015-2016.	The culture of disseminating information and meeting with local people through roundtable meetings has been introduced. Journalists understood the importance of including variety of voices, and local people's experiences. The "Mining Insight Magazine" plans to work on diversity and inclusion in its content.	Journalists emphasized the information provided by mining companies and government authorities. Due to the neglect of human-related issues, there is a lot of frustration and misunderstanding. Many local people resist issuing exploration licenses in their areas. As a result, journalists cover local voices only when resistance and protests occur. Local government lacks capacity to adequately distribute information. There is a lack of human resources.	High workload of officials doesn't allow to analyze the information and involve citizens in discussions. Some local decision-makers request illegal financing for soum/aimag's anniversaries and elections. As companies' donations are not transparent, local people suspect local government officials of bribery and corruption. Companies do not understand that people want more long-term investment to protect the environment and support local citizens through better education and public health. Many companies publish newsletters or brochures or organize meetings only once as their PR activity. This one-way communication is not efficient.	Preparing the next generation of mining journalists is essential. Field trips and training workshops to allow journalists to learn and share experiences. The company-community meetings should be organized regularly, and the information should be provided using different channels. For instance, online communication and information are essential.	The fact that the company did not meet its environmental duties, made the local people question whether mining is needed. Environmental degradation made their trust in mining to fall. In general, the perception of mining has inclined to negative in many places, not only in Govi-Altai.
Participants	Community engagement	Good practice	Challenges	Reasons/ causes of no / not effective engagement	Recommendations proposed solutions	Trust, Perception related

<p>7. Open Society Forum</p>	<p>Local community engagement in license-related decision-making is not permitted in the Minerals Law.</p> <p>Only 10 soum governors were invited by NGOs to the whole national event of the Mining Week which involved thousands of participants. The most important stakeholders in the most complex issue did not attend the forum which implies that the government may avoid consulting directly with communities.</p>	<p>Capacity building in engagement in LCA development and monitoring, making a good Focus on content of LCA since 2014 by organizing trainings in local areas and posting guidelines and brochures. Tools for monitoring LCA implementation has been developed and collaborated with local NGOs on monitoring. It is also engaged in disclosing mining related contracts such as state-owned company procurement contracts and conducts policy research on legal frameworks (the reports are available on the website).</p>	<p>Digital information is not accessible for local people especially herders.</p> <p>Mining related news and information is dominated by conflicts and irresponsible operations.</p> <p>National Government's indecisiveness or lack of capacity to regulate the licensing procedure in more open and transparent way generated conflict with local government on promoting mining.</p> <p>Open data is not accessible for community, but not fully used by the government</p>	<p>CSOs and community engagement processes in law making or decision making are not supported or facilitated. NGOs active in consulting and submitting feedback to the law amendments, but the feedback is not reflected in the law. Licenses are issued without informing the local communities, and this leads to conflicts. Regulations on resettlement and compensation are not practiced, only mentioned y in the law and the following bylaw to enforce it does not exist. The government does not use the data for its planning and policy making. Local community has been absent or insufficient in those policy discussions.</p>	<p>Public hearing and consultations should be organized in the processes of law and policy making as well as amendments in administrative norms and, acts and the bylaw on licensing. In LCA development: risks should be assessed, and informed and consulted with communities at the planning stage before decision-making, then the mutual understanding and reconciliation is achieved for sustainable operation. Mining policy should be aligned with SDGs. Legal drafts and policies should be consulted at local level and reflect local voices to ensure sustainability. Open and repetitive consultations with communities should be organized in broad scope.</p>	<p>Negative perceptions are shaped by adverse impacts of irresponsible mining, thus exploration has been decreased due to the local rejection (80%) A fear among local people that adverse environmental and social impacts induced by irresponsible mining operations may be replicated in their soum.</p>
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## Annex 4.2 Local government

Governor of Buregkhangai soum, Bulgan						
Policy	Community engagement	Local collaboration	Good practice	Challenges	Recommendations and proposed solutions	Trust, Perception related
<p>2015-2024 Soum development master plan;</p> <p>Sub-program on mining development has been approved by the CRK;</p>	<p>Mining and exploration projects are discussed at bagh and soum CRKs for feedback;</p> <p>Mining open day is organized twice a year in collaboration with the related department.</p> <p>Mining project EIAs are not approved by bagh CRK anymore, only presented according to the law. However, the Governor signs on projects only those supported by bagh;</p> <p>Communication tools – reports on website, annual journal (1000 copies per household), quarterly brochure, news posts on Buregkhangai FB Group and website, presentations and feedback at CRKs; meetings are more effective for discussing mining-related issues.</p>	<p>ASM activities are restricted and there is no more collaboration on this area. Over 80 ASM Partnerships were operating (9 members each) and they collectively paid taxes of 2-3 hundred million MNT taxes to the soum a year. In addition to the loss of household income and benefit to the local economy, the restriction might induce illegal form of ASM. He considers that the government decisions are changed often; as a result, local stakeholders are imposed to indefinite situation. They are looking forward to the newly approved Resolution #296 on enabling ASM under tripartite contract between NGO, entity and local government.</p> <p>Formal mining collaboration has been reduced. The number of companies established contract with the Governor decreased from 2021. From the contracted, only 50% implement the duties. Some companies have not reached provided CSR activities (e.g., sport hall). Companies' attitude has changed and are reluctant to implement CSRs. On those companies, the Governor plans to reject signing on their documents.</p>	<p>The soum used to send LCAs and related data to EITI and they used to publish the soum-specific journal on mining transparency;</p> <p>The soum had an effective collaboration with companies and as a result many local development projects were invested by companies in the past;</p> <p>The ASM Partnerships were trained and institutionalized under donor interventions. <i>(He was upset that those partnerships are not active now)</i></p> <p>Soum Development Fund was established in 2021, which is sourced by donations from mining and monitored by the CRK.</p>	<p>Conflicts - Licensing is decided at the national level, but when conflicts rise between local government, communities, and companies, local government must solve it and the mineral authority is not involved.</p> <p>He said he had felt more overwhelmed with duties because of mining and exploration related issues compared to other soums of Bulgan but received lower budget from the state as well as no significant benefits from mining. The soum has no income at the beginning of the year since the mining operations start from April and no other economic activities have developed.</p>	<p>A certain percentage of income from resource extraction should be dedicated to the local development via LCA and it should be stated in the law. Since it is not regulated by law, negotiation and monitoring is not formal and challenging for governors.</p> <p>If a company fails to implement the contract CSR, the permission for operation should be not provided for the following year at all decision-making levels.</p> <p>The governor does not want to support mining anymore since so many resources (gold) has been extracted, but no improvement in local development <i>(he was comparing with one of Manchurian mining cities how it has developed from premature mining)</i></p>	<p>Local communities perceive that exploration will be followed by mining and reject and conflict with them. The local government has no mandate to stop since the licensing is allocated at the national level digitally without local feedback.</p> <p>The governor perceives that if mining takes responsibility for financing the soum health and education issues 100%, the local people will accept mining, because people are rejecting due to the pits and dumps abandoned without rehabilitation and CSR is not implemented</p>

Deputy Governor of Khuld soum, Dundgobi						
Policy	Community engagement	Local collaboration	Good practice	Challenges	Recommendations and proposed solutions	Trust, Perception related
2020-2024 Plan: enhance mining contributions to the soum and support responsible mining, collaborate with mining companies that have license in the soum are, and local legislative authority's monitoring on mining and exploration activities at least 2 times a year.	<p>Community engagement is facilitated through bagh CRK. Since 2020, ASM issues have not been raised as the operation has been restricted. Before, training, awareness raising, and brochures were prepared in collaboration of ASM Partnerships.</p> <p>In the recent issuance of a license to one company, 21 CRK members, 20 officials and 3 community representatives were engaged.</p> <p>Main communication tool is CRK meetings where officials present their activities and results. The Deputy assesses the effectiveness of this communication channel as 'good' as it provides sufficient information.</p> <p>Herders' engagement is weaker than soum residents as they attend information sessions only once a quarter.</p> <p>SMS is used for weather forecast announcements from soum;</p>	<p>One of the companies provided blood pressure monitor to every household in the soum in 2021.</p> <p>5 or 6 households are included in the mining impact area within 3 or 4 km in the farthest.</p> <p>Company supported them (e.g. provided fodder and paid for travel to Manchuria in China and Ulan-Ude in Russia).</p> <p>Those herders sell meat to companies.</p> <p>When complaints are raised, bagh leaders do not intervene or solve the problem, and they only transfer the information to soum/aimag.</p>	<p>ASM Partnerships used to collaborate with her when she was the bagh leader on organizing public events such as sport competition, etc. (e.g., <i>Golden Sunrise</i> LLC)</p>	<p>EIA has not been carried out in the soum in recent years.</p> <p>Comparatively less conflicts as the Deputy asserted.</p> <p>In 2019, two cases of deaths (from accident) happened in previous ASMs. At that time, ASMs were stopped temporarily.</p> <p>Few complaints used to be raised on mining road crosses through pasture area. The problem was solved in that time.</p> <p>Complaints on herds' lung disease were raised relating it to ASM before. Today, only issues related dust from the abandoned open pits are raised by herders. The current biggest challenge is previous mining areas which</p>	<p>The abandoned pits should be rehabilitated. If a company fails to rehabilitate the mined area, it should not be allowed to continue its operation.</p>	<p>The Deputy is not supportive of ASM (if it is enabled again by law) due to irresponsible mining (missing rehabilitation), and the resistance by herders and communities. However, many requests to resume ASM are received at the Governor.</p>

	Bagh leaders send announcement via bagh FB groups in areas where mobile networks are accessible (Unitel is introducing its mobile network in the rest of the soum)			were left without rehabilitation.		
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### Annex 4.3 Local communities

Participants	Community engagement	Good practice	Challenges	Reasons/causes of no/not effective engagement	Recommendations and proposed solutions	Trust, Perception related
<b>Community in Bureg-khangai soum, Bulgan aimag</b>	<p>The results of the EIA are presented by the bagh meeting, and the presentation provides information about local investments rather than presenting the results of the EIA.</p> <p>There is no information on what kind of land use permits have been granted or are going to be granted.</p>	<p>A mining company of local origin and a mining company that does good rehabilitation and informs the people about it are perceived more positively</p>	<p>Residents are unhappy when a company with a license to operate without the permission of the local community starts operating in the community. In the first stage, citizens do not trust the answers given by the bagh members and the soum governor, but in the next stage, they do not believe in the decision of the mineral authority, which gives the license, and believe that it is corrupt.</p>	<p>Poor implementation of the LLA, failure to carry out rehabilitation, and even if it is done, it is not reported to the bagh public meeting. Because of irresponsible companies, the EIA reports of other companies are excluded from the agenda of the CRK.</p> <p>The fact that the concentrator is working in the lap of the local people's sacred mountain, is causing the local people's displeasure.</p>	<p>Social approval, or some degree of approval from the local community.</p> <p>All parties should be equally provided with information about the investments being made in the local area and for the citizens of the affected area.</p>	<p>Believe more in the company of a person of local origin and small-scale mining community of local people. There is little trust in mining companies and mining administrations.</p>
<b>Community in Khuld soum, Dundgobi aimag</b>	<p>Local communities are upset that mining companies pay more attention to the people in their area of influence.</p> <p>Citizens are upset that activities are started without the consent of local people.</p>	<p>In order to reduce the citizens dissatisfaction mentioned earlier, the citizens and the respective bagh leader are satisfied with the material support provided to all the citizens of the team.</p> <p>Companies provide assistance to the herdsmen in rural areas during severe winters and during natural disasters using their own funds and material base.</p>	<p>There is a tendency among herders that animal lung diseases emerged due to the dust generated by transport vehicles. It is understood that even if a complaint is filed, it will not be resolved. There is no information about how the complaints related to mining were resolved, and the information provided is not clear to the citizens.</p>	<p>Working too closely with local authorities creates a situation where people do not trust the local government and the mining company.</p> <p>More attention is paid to the households in the affected area (financial support, travel, procurement, etc.)</p>		<p>People's feedback is not taken, so there is no trust.</p> <p>Even if the problem is mentioned, it cannot be solved and the answer is unclear.</p>





## Annex 4.4 National Government

Participants	Challenges	Community engagement	Policy environment	Local collaboration
Ministry of Mining and Heavy Industry, Geological Policy Department	Conflicts are mainly due to lack of information. Government agencies provide incomplete information. The final reason that the information does not reach the citizens is that the responsible units (e.g., soum Governor's Office) does not distribute the information. Lack of information also depends on the initiative of the citizens themselves. Legal regulation of information exchange for government ministries and organizations is open. For example, information related to licenses and state-level research works is available on the websites of the agencies responsible for the work, but citizens do not search for it or access it themselves.	The Ministry responds within 30 days to citizens' complaints to the Ministry. If necessary, it is arranged to be extended once. Complaints and feedback from citizens are archived in the Ministry. But it is not clear whether it is open to the public.	The policy is made by the ministry and the place that implements it is the Mineral Resources and Petroleum Authority of Mongolia (MRPAM). We have mechanisms in place to keep our information transparent. On our website, you can see the events that are happening in the statistics and news.	<p>Mining and exploration companies must provide information to citizens when approving environmental management plans. However, problems arise because environmental inspectors do not properly distribute the information to communities. If the citizens are informed, there will be fewer problems. So, if citizens get all the information, it is possible to change their attitude.</p> <p>If mining activities run in their area, the citizens should demand contribution to local development in return.</p> <p>The correct understanding of mining should be given starting from kindergarten. So, this means that it is not a matter of one year, but it will acquire building knowledge in stages. Now, if we continue to do our best, we hope that our children will have good general knowledge. Or we're working on focusing on 14-15-year-olds when they're learning heavy science subjects, but we're going to give information like 0.020% chance about mining. We believe that we can train young people in the framework of social responsibility in cooperation with companies that want to operate in that area.</p>

Participants	Challenges	Community engagement	Policy environment	Local collaboration
<p>Mineral Resources and Petroleum Authority of Mongolia</p>	<p>Most of the conflicts arise from the issuance of licenses near sacred mountains and waters that Mongolian people worship. In locals' mind, these are the land of their ancestors. On the one hand, there is a conflict between people who want to avoid losing their habitat, on the other hand, there is a conflict between people who work at a certain risk, and on the third side, there is a conflict between community and the soum government who wants to protect their right to choose and be elected. If this is not regulated within the institutional and the legal framework, mining companies will not go far in this way.</p> <p>Additionally, the information about the exploration license is given to the aimag governor and CRK before the approval of the government, but they do not provide the information to the citizens.</p> <p>Misunderstanding also occurs due to the lack of information provided to citizens.</p> <p>Companies lack understanding on how to communicate with citizens. Even the local government does not know how to provide information to its citizens.</p>	<p>Citizens can directly submit their complaints and suggestions to MRPAM. More than 100 complaints are received annually. Complaints are made through the 1111 center of the Government, to the ministry, or the herdsman themselves come to the door and call journalists to report. Local people usually don't want to disturb their land and want to cancel licenses.</p> <p>Residents and herders complain that companies dig up the land and do not rehabilitate it, pollute the environment, dry up the mountains, and use chemicals.</p> <p>The ministry will respond to those complaints within 3 days.</p> <p>We contact relevant companies to present citizens' complaints and give instructions on how to solve them. However, companies do not return information on how it works, and there is no feedback. So far, there are no cases where citizens have been contacted back. There are no regulations governing how to settle complaints of citizens in our country.</p>	<p>Citizen's role in the environmental assessment is in the soum CRK. Those people should be empowered.</p> <p>Mining companies study citizens' positions and complaints as much as possible and reflect them in their operations.</p> <p>Every soum and company has a social responsibility contract. It is reflected in the Law on Petroleum. For example, a company will pay such an amount during exploration. Company and the soum Governor should discuss what they can do when signing the social responsibility contract.</p>	<p>In the process of researching the examples of Australia, Canada, and America, good teachers place social workers in their communities to see how local relations are managed. With a confidentiality agreement, the company gives monthly bonuses to the people in question. Companies work with 50-100 families in the local area of impact in Canada and Australia. It can be implemented in Mongolia.</p> <p>Our agency sends information on licenses to relevant provinces on a certain day of a month, saying that it has been announced by '.....' selection process. It should be made as open as possible to the citizens through the local website of the province.</p> <p>It is important to invest in construction in local mining areas. But before that, it is important to pay attention to human development. For example, some people do not understand the basics of mining in the CRK and soum government offices. Those people do not know what to make the citizens understand. So, it is important to make the soum citizens more knowledgeable and sensitive, it is necessary to empower the civil servants and members of local CRKs.</p>

## Annex 4.5 Mining companies

Participants	Challenges	Community engagement	Policy environment	Local collaboration
Environmental Coordinator of Khos Khas Company	The main dispute arises from the fact that citizens have insufficient or incorrect information. For example, the importance of their rehabilitation. The mining process itself is not fully understood.	Local citizens bring their problems to the bagh public meetings. On behalf of the company, I visit families in the mine-affected area once a year. During the visit, citizens' feedback and complaints emerge. It means that when the information is distributed to the citizens, they also receive research. Then complaints and feedback are presented to the company management team.	We have worked in cooperation with local organizations as part of our social responsibility contract. Local authorities are also interested in working together on infrastructure and future projects as much as possible. For example, the construction of a paved road in the center of soum, drinking water for herdsmen, and the construction of wells was solved. We did not initiate these works ourselves. It was initiated by local authorities rather than citizens. But the well water works were initiated by the herders themselves.	Improving community understanding is the task of government organizations. As for our company, there is no specific policy or plan in this area.
Head of Department and Public Relations Specialist of Monpolimet Company	As our company has many years of experience and has done a good job in rehabilitation, there have been no misunderstanding or major conflicts with citizens in the last 5 years.  However, there are occasional small violations due to the destruction of ungrown grass and trees by herders who graze their animals in the rehabilitated fields.	Our company has not received any complaints from citizens. We openly report on our activities at bagh public meetings.	We hold meetings with local community 4-5 times a year. Every year we report on the rehabilitation work done in that year. So, local administration staff also come and work. For instances, Governors and environmental inspectors come and we hand over rehabilitated areas to them.  We make a social responsibility contract every year. Local communities make their suggestions on this. We discuss it internally and negotiate with the local community, and select which works can be done by us.  We aim to purchase local products as much as possible. Meat and milk for mine workers are purchased locally, and in some cases, labor protection clothing is purchased locally.  Every year, our mine is inspected at least 10 times by the government. In each case, local representatives are required.	Along with starting any project in the local area, our company conducts EIA to monitor the understanding of the citizens, monitor their demands, and evaluate the situation to make the cooperation successful. It works well.  Everything about the local people's needs, opinions, and wants are reflected there.  The survey will be conducted once in 5 years. Based on this, cooperation becomes more effective.  All information should be given to the citizens right from the beginning of any project. For example, how will this project affect people's lives, what developments will the company make, etc. Local people and herdsmen can understand if the information is provided, such as whether there will be an increase in employment as a result. Then the public attitudes get right.

Participants	Challenges	Community engagement	Policy environment	Local collaboration

## Annex 5 Companies' websites content analysis

No	Company name	Website	Key words in mission, vision & values	Key words in home page category	Annual/CSR reports	Outreach materials
1	Baganuur	<a href="http://baganuurmine.mn">baganuurmine.mn</a>	Baganuur's mission is to become a leading national company based on knowledge and innovation, providing sustainable development.	The website has a "Sustainable development" category, divided into social responsibility, environment, and safety pages. In 2013, the company developed its Social Responsibility Strategy for 2014-2016 in cooperation with the GIZ and Normisur International's consulting team.	The 2021 Annual report includes environmental monitoring, restoration, and community cooperation sections, providing information on environmental protection and social responsibility activities. According to the voluntary responsible mining codex, Baganuur LLC signed MOU with the Baganuur district's government for economic and social development. Activities include donating MNT 11 million in COVID-19 prevention products to the district special commission and health center and supplying oxygen to district hospitals. In addition, work clothes and gloves were made through the SME Support Center.	The website has a "News" category and updates information frequently. Regarding social responsibility, it provides news on donating coal to 283 vulnerable families, joining the "No Alcohol Mongolia" movement, and Baganuur workers' donations through the Mongolian Red Cross Society. Regarding environmental management, the company provides information on planting 4000 trees within its "One Million Tree-2030" plan. There are also published posters about the company's biodiversity, waste management, water management, environmental monitoring, and rehabilitation.
2	Badrakh Energy	<a href="http://www.badrakhenergy.com">www.badrakhenergy.com</a>	In its profile, Badrakh Energy introduces itself as a "responsible mining company" with an excellent environment and health and safety record which adheres to best-practice standards. It also highlights that 96 percent of the company's 86 employees are from Mongolia.	The website has "Environment" and "Communities" categories. The company has implemented participative environmental monitoring since 2013 on a trilateral cooperation basis between the company, local authorities, and citizens. It highlights that the rehabilitation work plays a crucial role in maintaining the "license to operate." The company manages its socio-economic impact by: <ul style="list-style-type: none"> <li>• Commissioning studies to better understand the socio-economic environment in which the project will integrate,</li> <li>• Creating jobs and training local people in industrial and other skills,</li> </ul>	The company's 2020 CSR report provides detailed information on the corporate social responsibility approach, communities, environment, human resources, health, safety and radiation protection, and supply chain. Local Cooperation Councils, family visits, biennial community surveys, workshops, and local events are determined as engagement methods of the local community and herders. Since 2006, the company has invested more than MNT 5.6 billion in the socio-economic development of the communities. The LLA Implementation Committee representing the stakeholders selects projects and programs. More than MNT 90 million was spent on a student scholarship program and	No "News" category provides timely information for the communities. However, the "Environment" and "Communities" categories include outreach materials with photos, videos, and infographics. It also has factsheets, case studies, and brochures available to download. For instance, brochures on the Local Cooperation Council, the Student scholarship program, and Projects and programs for local herders are available to download in Mongolian. However, the information must be updated, as the brochures were dated July 2019.

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				<ul style="list-style-type: none"> <li>• Purchasing locally produced goods and services,</li> <li>• Supporting the development of infrastructures benefiting local people.</li> </ul>	medical equipment supply to the soum health center and livestock reconstitution program.	
3	Mongolrostsvetmet	<a href="http://www.mongolros.mn">www.mongolros.mn</a>	The company's mission statement includes "socially and ecologically responsible mining."	In its "About Us" category, Mongolrostsvetmet highlights that it has significantly improved its employees and the local community's knowledge, skills, and abilities. For example, the SOE employs more than 20 percent of the working-age population in Bor-Undur soum, Khentii aimag, and the Shijir Alt gold plant employs 34 percent of the working-age population in Uguumur village, Khailaast bag, Zaamar soum, Tuv aimag. In addition, Mongolrostsvetmet invested about 40 percent of its total investment in social infrastructure, including housing, schools, and kindergartens, a complex of social, cultural, sports, and utility facilities to address employees' social issues. As a result, more than 15,000 people live in cities and towns established based on mining factories.	In its "Transparency" category, the company provides information such as the list of students provided with the SOE scholarship, environmental rehabilitation, and the 2021 Financial report. The company's 2019 Annual report was published as a JPEG file in the "News" category. It states that the company invested about MNT 4 billion in social responsibility and provides water supply and heating to the Bor-Undur soum, Khentii aimag, and the Uguumur village, Zaamar soum, Tuv aimag.	The "News" category is updated frequently and provides information on the company's activities and vacancy announcements. Regarding environmental management, it provides information on its Environmental rehabilitation fund's activities, the "Rehabilitation-2024" program, pledge to plant 2 million trees by 2030 within the "Billion trees" national movement. In addition, the SOE implements an awareness-raising program for the public to increase ecological education by training on planting trees and waste management and involving local families in Uguumur village in planting trees. Regarding social responsibility, it provides news on scholarships and LLA, donating MNT 88 million to the National Emergency Management Agency.
4	Tavantolgoi	<a href="http://www.tavantolgoi.mn">www.tavantolgoi.mn</a>	N/A	The website has a "Social Responsibility" sub-category in its "About the Company" category, which provides information about its plan to plant 7.5 million trees in Umnugovi with the support of the "Billion Trees" national movement and signing an MOU with the National University of Mongolia to	In its 2022 First Half Report regarding social responsibility, the company highlights MNT 660 million in scholarships to 300 students, MNT 80 million to support agriculture and small and medium-sized enterprise sector, 3 tons of coal donation for 22,500 families (worth MNT 2.6 billion), MNT 336 million to support	The "News" category has a "Community News" sub-category, which provides information on company activities. In terms of social responsibility, Tavantolgoi JSC provides primarily news on scholarships, and donations, such as gifts, donating coal to local elderly, supporting Aimag's Emergency

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				establish Training and Research Center for tree breeding and studying local native plants for environmental rehabilitation. No information is provided on community development/engagement.	the health sector.	Commissions, and making donations to local herders. In addition, announcements to local citizens, such as dates on donations for herders and tender invitations, were also published in this category. There were news stories on organizing meetings and training workshops with local citizens; however, they could have been more specific, and no details were provided on what was achieved as a result. There is also a "Video news" sub-category, which mostly features the company's workers.
5	Ulaanbaatar tumur zam	<a href="https://ubtz.mn/">https://ubtz.mn/</a>	N/A	In its "About Us" sections, Ulaanbaatar railways describe itself as a "large employer with good social responsibility." According to the company's Management system booklet, it implements MNS ISO 26000: 2012 Guidance on social responsibility and MNS ISO 14001: 2016 Guidance on environmental management.	N/A	The website has a "News" category, and the company publishes the "Gan Zam" newspaper. However, no relevant information was found on mining community engagement.
6	Shivee Ovoo	<a href="https://shivee-ovoo.mn/">https://shivee-ovoo.mn/</a>	Shivee-Ovoo's mission is to be a "benchmark company in the mining industry with environmentally friendly, safe production and high productivity."	The website has a "Social Responsibility" category which is divided into "Social communication & development," "Environmental protection activities," and "Safety." The contents of social communications and development were not updated since June 2019. Regarding environmental protection, there was news on implementing the Environmental Management Plan of 2022.	N/A	There is a "News" section on the homepage. In October and November 2022, news on high-school students of Shiveegovi soum visited the company and had information on the mining process, environmental rehabilitation, and the company's work on community development. However, no further information is provided in the content. On October 2022, the company participated in the Govisumber aimag's "One family-One employment" labor day to provide



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						information on employment opportunities.
7	Erdenes Mongol	<a href="http://erdenesmongol.mn/index.php">http://erdenesmongol.mn/index.php</a>	The company's principles include good governance and transparency, defining the latter as "building the system of informing the public on the company's activities." With the motto "Resources to every citizen," the company aims to implement "sustainable development and responsible mining principles."	There is a "Sustainable development" sub-section in the "Transparency" category, which highlights based on the Sustainable Development Concepts of Mongolia and other regulations, the company implements best practices such as MNS ISO 26000: 2012 Guidance on social responsibility, EITI, The International Council on Mining & Minerals 10 Principles, IFC's Environmental and Social Performance Standards. In addition, there is a "Strategy" sub-section on Erdenes Mongol's 2019-2023 strategy, which includes disseminating "responsible mining" standards to its subsidiary companies.	N/A	The "News" category divides into "Press releases," which mostly post information on employment opportunities, "Photos & Videos," "In the press," and "Journalist's corner." There are mostly news media contents, such as interviews with the company's executive director and stories published on "Erdenes Mongol's subsidiary companies' activities
8	Erdenes Silver Resources	erdenessilver.mn	The company's values include "Sustainable development," and its principles highlight "Good governance" and "Transparency."	The "Operations" category on the homepage includes "Environment" and "Social Responsibility" sub-sections. However, the information and files were being updated and unavailable during this study.	N/A	The "News" section was updated frequently in the last few months, mainly with the news stories on the MERIT project's work on mine closure. There were stories on community engagement activities such as stakeholder meetings and information sharing "open day" on January 24-27th at the Salkhit mine site to introduce the mine closure environmental rehabilitation plan to include local citizens' feedback. On December 12th, 2022, a working group that included stakeholders such as local authorities and citizens' representatives visited the Salkhit mine site to evaluate the

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						implementation of the Environmental Management Plan for 2022 and discuss proposals for the works to be included in the Plan for 2023. The news story with the headline, "A model soum with great citizens' participation," describes the Merit project's first meeting with the local citizens on September 2022.
9	Erdenes Tavan Tolgoi	<a href="http://www.ett.mn">http://www.ett.mn</a>	Erdenes Tavan Tolgoi's mission statement underlines "providing sustainable development for its workers and stakeholders." Its values include a mutual trust that describes "respecting the interests of the community, customers, partners, and the public," and "cooperation and open communication will be valued, and the principle of honesty, transparency, and responsibility will be strictly adhered to."	The company's "About Us" section includes "On social responsibility" sub-section, which gives information on providing the difference in discounted prices for improved fuel, preventing Covid-19, donations to the health sector, and scholarships. Unfortunately, the information has not been updated since 2020.	The 2021 Annual Report includes a chapter on "Community Cooperation." The company's 2018 LLA implementation was evaluated as 92.6 percent or entirely sufficient, and established a new agreement on May 7, 2021. Within this, the "Erdenes Tavan Tolgoi: Development Support Fund" was established with MNT 3 billion in funding in 2021. The report underlines donating gers to families affected by the flood, meeting with local citizens to discuss the company's mid-term plan to establish a Mining Infrastructure-Industrial Complex based on the Tavantolgoi deposit, providing gifts and donations to veterans and local herders, supplying coal for the Thermal Power Plant of Dalanzadgad soum, donating books to local schools, and providing MNT 1.4 billion reimbursements for citizens of Tsagaan-Ovoo bagh affected with the resettlement. Regarding social responsibility, the company highlights three main projects: the "ETT for Children" program, "Ulaanbaatar without Smog," and "Against Covid-19."	The "News" section is updated with the company's operational activities. For example, the news story published on December 2022 with the headline "Erdenes Tavan Tolgoi became the best investor in Tsogtsetsii soum," describes the activities regarding social responsibility. In 2022, the company decorated the emergency room and women's delivery room of Tsogtsetsii Soum Hospital, sponsored the Tsagaan sar, camel festival, equestrian competitions, senior and children's festivals, awarded scholarships to 30 students, and provided donations to herders. Moreover, in the field of infrastructure, the company built 13.5 km of paved road from Tsogtsetsii soum, 1.11 km and 0.834 km of roads within the soum center, and 10/0.4 kW substations in the new settlement area.

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10	Erdenet	<a href="https://www.erdenetmc.mn/">https://www.erdenetmc.mn/</a>	Erdenet's mission is to "create national wealth by prioritizing sustainable development and responsible mining." The company values three pillars of governance: society, economy, and the environment.	The website has "Social Responsibility" section and provides details on the "Miner" apartment program, which consists of 1300 family apartments, and the " Erdenet" sanatorium complex, which diagnoses, treats, and rehabilitates all employees and veterans of "Erdenet" SOE. "Erdenet" complex higher education institution was established in 1975, and in 1996 it expanded into a Technological School affiliated with the Mongolian University of Science and Technology. Further, the section provides historical information on the Erdenet Sports complex, The Arts and Culture complex, "Selenge" resort, and "Nairamdliin Erdenes" children's summer camp. Moreover, the "Operations" section includes the "Environment" sub-section, which underlines that Erdenet is the first mine in Mongolia to implement the ISO 14001:2004 Guidance on environmental management.	N/A	The website's homepage has a "News" section, frequently updated with the company's operational activities. For instance, during extremely cold days, the company increased its electrical load to 50 mW and supported the Central Energy System to meet the dramatically increased demand for electrical energy. Regarding social responsibility, it underlines that the 384 employees of "Erdenet Plant" moved to the new apartments. In the last four years, the company provided MNT 16.8 billion to its 1490 employees to solve their housing problems. All the news stories are published at the separate news site Erdenettoday.mn.
11	MoEnCo	<a href="http://www.moenco.mn">www.moenco.mn</a>	MoEnCo's mission is to follow the best practices and safety standards of responsible mining in its operations. Besides building infrastructure related	The website has a section on "Social responsibility." The implementation of the environmental protection management plan is reviewed and confirmed by the Working Group every year. In 2014-2021, MNT 6.2 billion was spent on	N/A	There are no news updates on the website. However, the company provides information and applications for employment and procurement opportunities for local citizens and businesses. According to the local Cooperation Agreement, at least 70% of the total employees of the Khushuut

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			to mining, the company also trains local people, creates jobs, and directs project investments to support local small and medium businesses. More than 2,200 people are employed in the project, of which 70% are local residents.	environmental protection. Regarding social responsibility, the LLA were signed in 2014, 2017, and 2021. However, the agreements and further details were not available on the website. To support local development, MoEnCo LLC funds the Khushuut Development Fund and invests in health, education, and social sectors through the annual discussion and approval of the Khovd aimag's Citizens Representative Khural. As a result, MNT 2.2 billion in 2021 and MNT 4.3 billion in the first half of 2022 were funded. Providing local consumers with quality and affordable coal is one of the Company's social responsibilities. In 2018-2019, the project of comprehensive relocation of the Khovd aimag's Khusuut bagh center with 215 families as an administrative unit was successfully implemented with funding of more than MNT 10 billion.		project must be recruited from the local communities. As of November 30, 2022, there are 497 employees in MoEnCo LLC and 1965 employees in contracting companies. 89% of the employees of MoEnCo LLC and 77% of the employees of contracting companies are citizens of Khovd province.
12	Entrée Resources	<a href="https://www.entreeresourcesid.com/">https://www.entreeresourcesid.com/</a>	Entrée Resources underlines that it "helps secure the company's future by addressing corporate responsibility and ensuring accountability."	N/A (the website does not operate in Mongolian)	The technical report was published only in English.	N/A (the website does not operate in Mongolian)
13	South gobi Sands	<a href="https://www.southgobiresources.com/">https://www.southgobiresources.com/</a>	SouthGobi Resources is	The website's "Social responsibility" category includes	The Annual Information Form has a section on Social and Environmental	There is a "News" section which is rarely updated in Mongolian. The

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			committed to contributing to sustainable development: Economic, social & environmental.	"Corporate Social Responsibility," "Environmental management," and "Health & Safety" sub-categories. Regarding CSR, the company acts across four themes: Responsible Economic Growth, Environment, Human Capital, and Community. In addition, SouthGobi commits to understanding and responding to the concerns and aspirations of the community to enhance the quality of life for communities impacted by its business activities.	policies. It completed an environmental monitoring program in cooperation with the mining companies of Nariin Sukhait. Regarding community development, the company contributed to the runway paving at the Ovoot Tolgoi airport. Roads to Gurvantes and the Shivee Khuren border crossing have been improved and upgraded. Regarding social responsibility, the company spent MNT 532,436,732 in 2021 on donations. Int includes scholarships to 15 students, coal and livestock feed donation to local residents, and funds to the Animal Protection Fund. Moreover, the Corporate Citizenship Committee was created to review and approve donations for sustainable projects.	news release about the training on the Integrated Management System was published in April 2022. The "Awards" sub-section highlights becoming one of the TOP 100 Enterprises of 2019, "Best Employer of 2018," "Best Social Insurance payer" of Sukhbaatar district, and "The Excellence in Healthy and Safe Workplace" by the Ministry of Labor and Social Protection in 2018.
14	Steppe Gold	<a href="https://steppegold.com/">https://steppegold.com/</a>	The company's mandate is to build strong relationships with partners, communities, and all levels of the Mongolian government.	The website has a "Sustainability" section which is divided into "Sustainability," "Social Responsibility," "Environment," and "Health and Safety." The company has signed a LLA ensuring a beneficial working environment for all parties. Regarding social responsibility, the website provides information with infographics and videos on hiring more than 300 employees directly and indirectly, training 36 people, and providing jobs, scholarships. Moreover, the company's dairy products and meat are 100% supplied by local communities. Steppe Gold also sponsored sambo wrestler.	In its 2021 Technical Report, Steppe Gold provides detailed information on Environmental Impact Assessments, Environmental Management Plan, and Local Cooperation Agreement.	In the "News" section, the company frequently publishes news releases in English and Mongolian on operational updates. However, most of the content is targeted at shareholders. In the "Media" sub-section, all the videos were in English.

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15	Naran Mandal	<a href="https://naranmandal.com">https://naranmandal.com</a>	Naran Mandal's vision is to set an internationally high standard as a leading Mongolian gold mining and exploration company dedicated to its people, the Bayankhongor community and environment, and its investors.	"Our Approach" section includes "Core Values," "Community Initiatives," "What Our People Say," and FAQ sub-sections. Naran Mandal has invested over MNT 700 million in various entities in the local community. Regarding community initiatives, the company underlines local community health programs, children's day celebrations and providing gifts to children, providing school supplies to children, scholarships to 54 students, building 10 winter shelters for local herder families, constructing a well for herders, and hosting a reception and concert to celebrate an international day of older persons.	N/A	The "Media" section publishes press releases. During this study, two documents were published: Greetings from the CEO for the Naadam celebration and donations to 10 herder families for winter preparation.
16	Bayan Airag Exploration	<a href="http://bayanairag.com">bayanairag.com</a>	Bayan Airag Exploration underlines "uncompromising standards of safety, environmental stewardship and social responsibility" in its vision statement.	The website has a "Sustainable development." Regarding the environment, the Ministry of Environment and Green Development approved its Detailed Environmental Impact Assessment in 2013 and 2018. The company update and submit EMPs and Environmental Monitoring Programs annually to the Ministry for approval. In the "Community & Social responsibility" sub-section, the company provides detailed information on its policy and system. Bayan Airag has Community Relations Department with a team of 13 people, which holds multiple meetings and	The company's Social Development report, 64 pages journal, targets the community. It provides information on responsible mining, local development, safety, environmental management, human resources, and business excellence based on interviews with more than 35 people. The report highlights local people who were hired by Bayan Airag. According to the report, misinformation about cyanide leakage spreads quite often. However, local people who work at the company point out that there was a small incident, which was resolved under professional inspection. The report also provides detailed information about the technology and safety to counter the misinformation	The website has a "Media" section, which is not updated frequently. Five out of six news stories published from 2019 to 2020 are about becoming one of the top 100 companies and being the "responsible taxpayer." The remaining story, published in 2019, highlights that the company was awarded "Creative Water Management Technology" by International Financial Corporation.

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				<p>training at bagh and soum levels to capture local community voices. Regarding local development projects, Bayan Airag aims to impact on the development of infrastructure in Zavkhan Province. The company initiated and implemented environmental, health, education, SME &amp; employment promotion projects, cultural heritage support, sport and public health, and humanitarian activities. Bayan Airag Exploration has been working with local government offices and citizens of Durvuljin and Erdeneksaikhan soums under LLAs and invested MNT 1.79 billion between 2013-2018.</p>	<p>on cyanide leakage. Furthermore, it features the deputy governor of Erdenekhairkhan soum, the chairman of the citizens' representative khural of Durvuljin soum, and the company's community relations department chairman to provide detailed information on the LLAs and community engagement activities. Local business owners share their experiences, representatives from local NGOs, such as "Bayan Durvuljingiin Uguuj" provide details on their work and local benefits.</p>	
17	Tsairtmineral	<a href="http://www.tsairt.mn">www.tsairt.mn</a>	N/A	N/A	N/A	<p>The website has a "News" section, which shares information on its safety and environmental policy. The company published five news stories from 2018 to 2022, which included donating to the aimag's emergency management unit as a Covid-19 response, organizing a painting and essay contest, and becoming one of the top 100 companies.</p>
18	Boroo Gold	<a href="http://www.boroogold.mn/">http://www.boroogold.mn/</a>	<p>Boroo Gold values safe and responsible mining, environmental protection, and community economic development.</p>	<p>The website has a "Sustainable development" category which includes "Environment," "Health and Safety," and "Community." Its environmental management system (EMS) conforms to the requirements of the international standard ISO 14001. Regarding community development, the company's, since its foundation,</p>	N/A	<p>The "News" section was not updated since 2020, and press releases were available only in English.</p>

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				benefit to Mongolia is MNT 1.2 trillion, including MNT 11.4 billion to the local community. According to the LLA with Bayangol soum and Mandal soum, Selenge aimag, the company provides yearly funding to support soum infrastructure development, social welfare services, and SMEs. For instance, the company invested in constructing a paved road in Zuunkharaa.		
19	Moncement Building Materials	<a href="http://moncement.mn">http://moncement.mn</a>	"Building a better future by being the best building materials company in Mongolia with top product quality, reliable services, and exemplary social responsibility" is the company's vision. In addition, it values sustainable development and environmental protection.	The website has a "Sustainable development" section. The company's "Safety first" principle prioritizes employee well-being. Furthermore, based on its "One World" principle, the company is committed to giving back by optimizing the utilization of non-renewable natural resources, maximizing the protection of the natural environment and the local eco-system, implementing the 3R system and green procurement policy, and supporting the local small and medium enterprises and of special needs.	N/A	The website's "Media" section is frequently updated with news, videos and photos. It highlights that the company was awarded as the Best Entrepreneur with the poster that underlines that in six years, it worked with more than 150 local supplier organizations and participated in 200 public and private sector major developments, creating more than 1,000 jobs. In the Urgun soum of Dornogovi aimag, the company planted 300 trees to counter desertification. The company also announced a campaign that MNT 60 from each bag of cement purchased would be invested in building children's kindergarten. It publishes an interview with a local citizen who works at the company and shares his experience, including that employees are provided with housing opportunities. The videos featuring company workers also convey that the company hires local people and contributes to local development.
20	Oyu Tolgoi	<a href="http://www.oyutolgoi.mn">www.oyutolgoi.mn</a>	Oyu Tolgoi's mission	The website has a "Sustainable	The Year in Review 2021 report has	The website has a "Media" section



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			<p>includes long-term economic and social contributions to Mongolia and its people. The company values the safety and well-being of its employees, contractors, and communities.</p>	<p>development" section which includes "Health, safety and environment," "ESIA management," "Communities," and "Sponsorship and donations." In 2012, a comprehensive ESIA was undertaken. ESIA, Management plan, and audits are available to download. Regarding social responsibility, the company assists local initiatives and community participation projects, programs, and partnerships to support local development. The company's social responsibility policy is based on ISO26000: Guidance on Social Responsibility. Oyu Tolgoi supported education projects such as organizing the Mongolian Engineer 2018 event, donating to Sun Kids kindergarten, implementing anti-bullying projects at 10 target schools, funding Special School #25 for disabled children, and sponsoring a TEDx Youth ESM event for secondary school children. The company also donated medical equipment to national hospitals and high-quality IQ Air purifiers to the Maternal and Child Health Research Centre and Special School #116. Other projects include furnishing a classroom for children with autism at Kindergarten #186, donating fitness equipment to the Khudulmur summer camp for disabled children, and sponsoring</p>	<p>an "Engaging with community stakeholders" section. It underlines that the company conducted over 800 meetings and engagements with 1,172 key stakeholders, including government officials, impacted herders, and other community members in Umnugovi. Oyu Tolgoi also organized annual Open Day events in Khanbogd, Dalanzadgad, Manlai, and Bayan-Ovoo soums. According to its Cooperation Agreement, the company invested USD 5.7 million in the Gobi Oyu Development Support Fund in 2021. Oyu Tolgoi continued to support agriculture businesses, launched the "Herder" mobile phone app, organized 5 business capacity-building training to 29 participants and 99 consultation meetings, and implemented a pilot project to support herder families to supply camel milk for delicacies production, among other projects and donations. Local supply represents 25 percent of Oyu Tolgoi's national procurement, and 24.7 percent of the total Oyu Tolgoi site workforce was locally hired. In addition, 94 local suppliers provided goods and services to Oyu Tolgoi in 2021. According to its long-term partnership with the National Police Agency, the company held nationwide campaigns on road safety and established speed monitoring cameras on the Sainshand to Zamiin-Uud road. The report also mentioned donations for preventing and responding to COVID-19 and educational projects</p>	<p>that provides "Press releases," "Highlights," "Brand guidelines," "Stories and articles," and "Media Gallery," which all are frequently updated. Press releases published on timely corporate activities, such as signing an MoU for the "100 million trees" program and releasing quarterly performance reports. Stories and articles feature "Humans of Oyu Tolgoi," with interviews and stories about company employees. Finally, the Media gallery consists of videos and photos on a more general topic which aims to educate people on the company's history and how it works. Moreover, the company publishes a quarterly "Miner" magazine, which features the company's activities and the local community's development. For example, the 2022 Q4 magazine had 24 pages. It featured an interview with Jacques van Tonder, Chief Development Officer of Oyu Tolgoi, who supported the Men's health promotion campaign, an interview with the company employee who transferred to Rio Tinto's Kennecott, "Mining Week 2022" event, community open day events, Q&amp;A organized among employees, advises on applying for scholarships and career opportunities and other information. The website has other outreach materials, such as quarterly Scorecards, which shows progress on safety, environmental performance, procurement, employment, and social contributions with infographics, virtual tour, and posters on scholarship</p>

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				the "No Need to Rush" and "Abide by the Rules" traffic safety campaigns.	and programs targeting teenagers' mental and reproductive health.	announcements.
21	Aduunchuluun	<a href="http://aduunchuluun.mn/">http://aduunchuluun.mn/</a>	N/A	The website's "Social responsibility" section. Regarding social responsibility, the company underlines socio-economic support for its employees. For instance, the "Miner apartment complex" was built from 2008 to 2013, and 68 percent of employees live in apartments. To encourage older employees, the company has provided compensation. The company provides 8 tons of coal annually, travel support, and compensation to its veterans. Furthermore, the company supports the elderly and people from vulnerable groups in communities with coal and fuel, children, sponsors arts and cultures events, Naadam, and other festivals, and supports local government unit's activities. The company was awarded as a "Responsible taxpayer" and provides information on paid taxes. Regarding environmental rehabilitation, Aduunchuluun started mining operations in 1955 and started new Environmental rehabilitation works in 2002.	The company's 2022 Half-Year Report provides information on key activities and financial performances. However, no information was detected on social responsibility and community development/engagement.	The website has a "News" section. Most of the information posted is about the open vacancies and announcements for shareholders, such as meetings and payments of dividends. Regarding social responsibility, the company published news on cleaning up the Kherlen river area according to the governor's order and donating MNT 5 million to the Kherlen soum's Emergency Management Unit for Covid-19 response.
22	Burdel Mining	<a href="https://burdeliminin">https://burdeliminin</a>	N/A	The website has a "Social Responsibility" section. Regarding	N/A	N/A

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				<p>community, in September 2021, the company opened the Uguumur kindergarten in Sov bag, Zaamar soum, with a capacity of 240 children. On education, Burdel Mining LLC has been responsible for the tuition fees of 40 students of Zaamar soum since 2017. In addition, it donated MNT 100 million to expand a school dormitory in Buregkhangai, Bulgan. Regarding environmental rehabilitation, the company annually updates the EMP and rehabilitates according to the plan. Moreover, the company supports local people in participating in biological rehabilitation by hiring them to build fences and plant vegetation.</p>		
23	MAK (Mongolian Gold)	<a href="http://www.mak.mn">www.mak.mn</a>	N/A	<p>The website has a "Social Responsibility" section highlighting that the company invested MNT 28.2 billion in social responsibility projects and programs. In 2022, an eco-school for 960 children conforming to international standards was built in Yeruu soum, Selenge aimag, at the cost of 11.5 billion MNT. In addition, MAK provided scholarships for 11 students from Umnugovi, Dornogovi, and Dundgovi aimags. In Dalanjargalan soum, the company donated building materials to construct 8 family apartments. Regarding responsible mining, technical and biological rehabilitation has been</p>	N/A	<p>The website has a "News" section frequently updated with news stories, videos, and posters. In its "Social responsibility" sub-section, the company highlights providing scholarships with the news story and video featuring awardees, joining the "Billion Trees" national initiative and planting 11,000 trees, protecting wild animals, and building an eco-school for 960 children in Yeruu soum, Selenge aimag.</p>

№	Company name	Website	Key words in mission, vision & values	Key words in home page category	Annual/CSR reports	Outreach materials
				<p>carried out on all used areas and handed over to the local administration. The company also planted and grew more than 150,000 trees near its mining as part of the "Billion Trees" national initiative. The best example of MAK's mining rehabilitation is the Eldev coal mine in Dalanjargalan. Investment in infrastructure is the primary task for MAK regarding social responsibility. The company connected five of the last six soums in Mongolia to energy sources. In addition, it built a 55 km paved highway in the direction of Shiveekhuren-Nariinsukhait, and a substation of a 220 KV 160 km two-circuit power transmission line in the direction of Oyutolgoi-Tsagaansuvarga.</p>		
24	Mongol Mining and Exploration	<a href="http://mme.mn/index.html">http://mme.mn/index.html</a>	The company has a "Responsible mining" motto on its homepage.	N/A	N/A	The website has no dedicated section on "responsible mining" or "news." On its homepage, only two videos about mining operation and environmental rehabilitation are provided, which features company employees and the result of the rehabilitation work. Local and central authorities have scored the company's environmental management and rehabilitation performances at 91-98 percent since 2017.
25	Monpolimet	monpolymet.mn	"Introducing new know-how, innovation, and advanced technology with environmentally	The website has a "Social responsibility" section which divides into "Economy," "Munkh Foundation," and "Environment." The "Economy" sub-section provides information on training	N/A	The "News" section provides timely updates on company activities. For example, the latest news story highlights that the company was awarded as a "Leading rehabilitation company" for the 21st time. In

№	Company name	Website	Key words in mission, vision & values	Key words in home page category	Annual/CSR reports	Outreach materials
			friendly eco-solutions and supporting green development in every field of operation" is the company's mission. "Social responsibility" is the company's motto.	local people, creating jobs, and caring for its employees' socio-economic well-being, such as providing housing. Regarding social care, it lists developments such as the government unit building in Buregkhangai soum, Bulgan aimag, elementary school in Dashinchilen soum, renovation of the school dormitory, and building wells in Zaamar soum. In addition, according to the LLA, it provides more donations and support programs. The company's environmental activities include environmental policy and management, environmental monitoring, ecological restoration, and environmental education and monitoring. The "Munkh Foundation" sub-section leads to its separate website, which was unavailable during this study.		addition, news stories on officials visiting the company's rehabilitation areas were posted recently. Moreover, photos and posters aimed at environmental awareness and education were frequently published in the "News" section.
26	Usukh Zoos	<a href="http://usukhzoos.mn/">http://usukhzoos.mn/</a>	N/A	The website has a "Social responsibility" section which underlines that "Cooperating with local people and organizations to build a secure future" is the company's social responsibility policy. The company invested in renovating the Gurvantes soum's hospital, installing traffic lights in soum center's intersection, and renovating the sports complex. In addition, the company trains and provide job opportunities for local people, provide scholarships for students, plants more than 11,000 trees, and builds 1-2 wells	N/A	N/A

No	Company name	Website	Key words in mission, vision & values	Key words in home page category	Annual/CSR reports	Outreach materials
				annually for local families.		
27	Ulz Gol	<a href="http://ulzgroup.mn/">http://ulzgroup.mn/</a>	“Creating a risk-free and environmentally friendly working place for enhancing value for shareholders, employees, business and social partners” is the company’s mission.	The "Social Responsibility" section provides information on biological and technical rehabilitation, health and safety policy, and community support programs. It describes the company's rehabilitation activities with numbers and before/after photos. Regarding community support programs, Ulz Group works with the communities where it operates by signing LLAs, providing jobs for local people, supporting small and medium-sized businesses, and providing support for students' education and training. All the activities listed were from 2014 to 2017, and the information was not updated since.	N/A	The "News" section was not updated since 2018.
28	Khan Altai Resources	<a href="https://khanaltai.mn/">https://khanaltai.mn/</a>	“Build a sustainable and socially responsible gold mine capable of competing in the world and jointly create the development of the western region of Mongolia” is the company’s mission.	The website's "Sustainable development" section underlines Health, Safety, and Environment. The project's detailed environmental impact assessment (EIA) was conducted in 2021 and amended in 2022. As part of the assessment, the company works with the local administration, community organizations, and citizens' representatives to determine the negative impact and plan measures to reduce it. In addition, the company implements sub-programs on: -Cultural heritage protection -Promoting education and health of local people	N/A	The website has a "News" section on the homepage, providing basic information about the sub-programs.

№	Company name	Website	Key words in mission, vision & values	Key words in home page category	Annual/CSR reports	Outreach materials
				<p>-Local infrastructure development            -Supporting local businesses and economy            -Participatory environmental monitoring</p>		
29	Energy Resources	<a href="http://www.energyresources.mn">www.energyresources.mn</a>	<p>The company values the Health &amp; Safety of its employees and environmental and social responsibility.</p>	<p>The website's "Sustainable development" section provides information on the company's CSR policy, socioeconomic contributions, community development projects, human resources, environment, and safety.</p> <p>The company developed its CSR policy according to the ISO26000: Guidance on social responsibility, and IFC, EBRD recommendations. Instead of one-time donations, grants, or short-term projects&amp;programs, the company aims to implement the principles of responsible mining, make a long-term and practical contribution to the welfare of society and the economic development of the country, and create a solid foundation for sustainable development.</p> <p>Regarding socioeconomic contributions, the company underlines that it has been consistently ranked in the TOP 5 in the country in terms of tax payment. About 4,000 people are directly employed and have income under the Ukhaa Khudag project, and about 40% are the people of Umnugovi aimag. In addition, the company cooperated</p>	<p>Energy Resources CSR Report 2021, 21 pages document, provide detailed information on the company's CSR policy, socioeconomic contributions, community development projects, environment, and safety. The environmental and social impacts of the company's projects and activities are evaluated and presented to the interested parties and the public, according to following plans:</p> <ul style="list-style-type: none"> <li>• Project stakeholder engagement plan</li> <li>• Public consultation and information dissemination plan</li> <li>• Environmental and social management plan</li> <li>• Complaint settlement procedure</li> <li>• Cultural heritage management plan</li> <li>• Public Health and Occupational Safety Plan</li> <li>• Evacuation plan etc.</li> </ul> <p>Projects/ programs are implemented in the main areas of supporting sustainable local development and stabilizing social infrastructure, improving access to infrastructure and health services, supporting education, protecting cultural heritage, and supporting small and medium businesses. Regarding community development, the report underlines the coal and WATER supply to communities, projects, and programs</p>	<p>The website's "News" section is frequently updated with videos, infographics, and company activities news stories, such as becoming one of the Top 100 companies and joining the "Billion Trees" national initiative. On October 18th, a news story was posted on its "Citizen's Participation in Responsible Mining" open-day event in Tsogt-Ovoo, Khan-Khongor, and Tsogttsetsii soums gathered 700 local citizens. In addition to informing participants about the company's activities on environmental management and social investment in the communities, the company also conducted surveys, received resumes for open vacancies, and gathered complaints forms. Participants' opinions and feedback were also featured in the story.</p>

No	Company name	Website	Key words in mission, vision & values	Key words in home page category	Annual/CSR reports	Outreach materials
				<p>with more than 2,000 domestic enterprises as subcontractors and suppliers.</p> <p>Every year, more than MNT 1 billion has been spent on local development projects and programs in health, education, supporting SMEs, and protecting cultural heritages.</p>	<p>that directly target 10,000 people. The company trains local people in project development to support SMEs and provides soft loans. SME owners who attended the program shared their success stories in the report. The programs such as "Forest Line" on planting trees and vegetables with the local community, "Good Neighbour," "Water Supply for Grazing Land," and the company's donations were highlighted in the report.</p>	



## Annex 6 Analytical framework

Key area	Research questions that fit under overall questions	Key concepts for analysis	Tool	Data Sources
Effectiveness of community engagement and outreach	What community engagement approaches are (used) in mining industry? What approaches worked and why? What are lessons from failed community relations (internationally and in Mongolia)?	Community participation level Forms of communication Purpose of outreach materials Good cases, lessons, factors and processes influencing community-mining engagement. Information availability (Role of) Disinformation Local context Role of media, NGOs, professional Associations, and governments in community-mining relationship establishment. Risks associated with failure of engaging communities.	SLR KII FGD Field Observation	Databases: Web of science (2018-2022) Scopus (2018-2022) Grey literature: Government reports, publications of international organizations (WB, IFC, UNDP, ADB, MERIT, Adam Smith Int'l, etc) (2018-2022) All materials in Mongolian language in relations to community engagement and mining (websites, blogs, videos, company brochures, etc) (2018-2022)
Public attitude towards mining	What is public perception and attitude towards mining? How was it evolved in last 5 years? Internationally and Mongolia?	Factors, processes that influence community perception NGOs, Governments and media role, activities	SLR KII FGD	
Understanding on community engagement	How stakeholders understand community engagement, what are expectations from community engagement in soums in Mongolia?	Community engagement, Mining community relationship	KII	Research participants
Risks and opportunities	What obstacles, risks do you face in community-mining engagement? What opportunities exist to improve community-mining engagement? in Mongolia	Obstacles, risks, opportunities as defined by participants	KII FGD	Research participants
Desired communication way	What are the best ways to disseminate/share information, and receive information related to engagement?	Views, experiences of past and ongoing outreach communication materials and new ideas	KII FGD Field Observation	Research participants

# Bibliography

1. Altanchimeg Zanabazar, B. B. (2019). The Indonesian Journal of the Social Sciences. *The Indonesian Journal of the Social Science*, 10(3).  
<https://journal.scadindependent.org/index.php/jipeuradeun/article/view/409>
2. Asia Forum (2019). Fact Finding Mission Report on the impacts of mining on defenders and environment in Khentii and Dornod provinces of Mongolia.  
<https://www.forum-asia.org/uploads/wp/2019/10/FFM-Mongolia-2019-Report.pdf>
3. Asia Foundation (2016). Frugal Rehabilitation Methodology, Field Handbook,  
<https://asiafoundation.org/wp-content/uploads/2016/04/Frugal-rehabilitation-methodology-FRM-eng.pdf>
4. Asia Foundation (2016). Frugal rehabilitation demonstration in Mongolia  
<https://asmhub.mn/uploads/files/cases-studies-encompressed.pdf>
5. Batdelger, T., Tuvshintugs, D., Usny-Ekh, E., Bayartsogt, K.-E., Zagdbazar, M., Davaakhuu, O., Tserendorj, O., & Davaa, U. (2022). *Impact of Mining on Local Livelihood and Social Licensing in Mongolia*. Springer Nature Singapore.  
[https://doi.org/10.1007/978-981-19-5515-0\\_6](https://doi.org/10.1007/978-981-19-5515-0_6)
6. Chawa, A. F., & Grace, M. (2019). Demystifying Power in Community Development Practice. *International Journal of Asia Pacific Studies*, 15(1), 153-181. [https://ijaps.usm.my/?page\\_id=4449](https://ijaps.usm.my/?page_id=4449)
7. Canada's Minerals and Metals Sector (2016). Good community engagement practices.  
[https://natural-resources.canada.ca/sites/nrcan/files/mineralsmetals/files/pdf/rmd-rrm/GoodPractices2ed\\_En.pdf](https://natural-resources.canada.ca/sites/nrcan/files/mineralsmetals/files/pdf/rmd-rrm/GoodPractices2ed_En.pdf)
8. Chimedlkham, E. (2019). Community Perception of Cooperation Agreement. In *University of Alberta*.  
<https://era.library.ualberta.ca/items/f105ed2f-2837-4c48-8bad-986f5fb13a35>
9. Dagvadorj, L., Byamba, B., & Ishikawa, M. (2018). Effect of local community's environmental perception on trust in a mining company: A case study in Mongolia. *Sustainability (Switzerland)*, 10(3), 1–12. <https://doi.org/10.3390/su10030614>
10. Dalaibuyan, B. (2022). Negotiating the coexistence of mining and pastoralism in Mongolia. *Journal of Contemporary East Asia Studies*, 11(1), 46–63.  
<https://doi.org/10.1080/24761028.2021.2021356>
11. Daley et al (2018). Gender, Land and Mining in Mongolia. [http://mokoro.co.uk/wp-content/uploads/Gender\\_Land\\_and\\_Mining\\_in\\_Mongolia\\_WOLTS\\_Research\\_Report\\_No.1\\_January\\_2018-1.pdf](http://mokoro.co.uk/wp-content/uploads/Gender_Land_and_Mining_in_Mongolia_WOLTS_Research_Report_No.1_January_2018-1.pdf)
12. Davis, R., & Franks, D. M. D. (2011). The costs of conflict with local communities in the extractive industry. *First International Seminar on Social Responsibility in Mining*, 19–21.  
[https://www.csr.uq.edu.au/Portals/0/11srm\\_cap06\\_p88.pdf](https://www.csr.uq.edu.au/Portals/0/11srm_cap06_p88.pdf)
13. Environmental Performance Index, 2022  
<https://epi.yale.edu/epi-results/2022/component/epi>
14. Fraser, J., & Kunz, N. C. (2018). *Water Stewardship : Attributes of Collaborative Partnerships between Mining Companies and Communities*.  
<https://doi.org/10.3390/w10081081>
15. Hosoi, Y., Batdelger, T., & Chuluundorj, K. (2022). Economic Dependence of Mongolia on Minerals.  
<https://link.springer.com/book/10.1007/978-981-19-5515-0>
16. IFC (2021). Endline public perception survey. Mining, Communities & water management project.
17. International Republican Institute (IRI) and IRIM (2022). Public opinion poll: Residents of Mongolia.  
<https://www.iri.org/wp-content/uploads/2022/08/Eng-Public-Opinion-Poll-Final-PUBLIC.pdf>
18. Independent Reporting Mechanism (IRM): Mongolia Transitional Results (2019–2021)  
[https://www.opengovpartnership.org/wp-content/uploads/2022/02/Mongolia\\_Transitional-Results-](https://www.opengovpartnership.org/wp-content/uploads/2022/02/Mongolia_Transitional-Results-)

[Report\\_2019-2021\\_EN.pdf](#)

19. IGF Case study: The importance of Consultation and Engagement in Environmental and Social Impact Assessments, 2023

<https://www.iisd.org/system/files/2023-01/igf-case-study-environmental-social-impact-assessments.pdf>

20. IGF: Mongolia Mining Policy Framework Assessment Report 2017

<https://www.iisd.org/system/files/publications/mongolia-mining-policy-framework-assessment-en.pdf>

21. Impact of Coronavirus disease (COVID-19) on Mongolian Mining Sector, presentation of survey findings, 2022

[http://www.eri.mn/download/2022/en/01.%20ERI%20COVID%20impact\\_EN.pdf](http://www.eri.mn/download/2022/en/01.%20ERI%20COVID%20impact_EN.pdf)

22. Kilajian, A. & Chareonsudjai, P. (2021). Conflict resolution and community engagement in post-audit EIA environmental management: Lessons learned from a mining community in Thailand. *Environmental Challenges*. 8, 100253.

<https://www.sciencedirect.com/science/article/pii/S2667010021002328>

23. Kot-Niewiadomska, A., Simić, V., Tost, M., & Wårell, L. (2022). Public participation as an element of a mineral deposit safeguarding system – international experiences. *Gospodarka Surowcami Mineralnymi / Mineral Resources Management*, 38(4), 5–28.

<https://doi.org/10.24425/gsm.2022.143626>

24. KPMG. (2021). Risks and opportunities for mining. In *Kpmg*.

<https://kpmg.com/xx/en/home/insights/2021/02/risks-and-opportunities-for-mining.html>

25. Malone, A., Smith, N.M., & Zeballos, E.Z. (2021). Coexistence and Conflict between artisanal mining, fishing and farming in a Peruvian boomtown. *Geoforum*. 120, 142-154.

<https://www.sciencedirect.com/science/article/abs/pii/S0016718521000208>

26. Matikainen, L. S. (2022). Addressing Sustainability in the Mining Industry Through Stakeholder Engagement. *South Asian Journal of Business and Management Cases*, 11(1), 35–48.

<https://doi.org/10.1177/22779779221078673>

27. Mercer-Mapstone, L.D., Rifkin, W., Moffat, K. & Louis, W. (2018). What Makes Stakeholder Engagement in Social Licence “meaningful”? Practitioners’ conceptualisations of dialogue. *Rural Society*. 27(1), 1-17

<https://www.tandfonline.com/doi/abs/10.1080/10371656.2018.1446301?journalCode=rrso20>

28. Mijiddorj Purevsuren (2019). The mining melodrama, case of Gurvantes. *The Impact of Mining Lifecycles in Mongolia and Kyrgyzstan*.

29. Mutti, D., Yakovleva, N., Vazquez-Brust, D., & Di Marco, M. H. (2012). Corporate social responsibility in the mining industry: Perspectives from stakeholder groups in Argentina. *Resources Policy*, 37(2), 212–222. <https://doi.org/10.1016/j.resourpol.2011.05.001>

30. Myadar, O., & Jackson, S. (2019). Contradictions of Populism and Resource Extraction: Examining the Intersection of Resource Nationalism and Accumulation by Dispossession in Mongolia. *Annals of the American Association of Geographers*, 109(2), 361–370.

<https://doi.org/10.1080/24694452.2018.1500233>

31. Natural Resources Governance Institute (2021). Resource Governance Index Mongolia.

<https://resourcegovernance.org/analysis-tools/publications/2021-resource-governance-index-mongolia-mining>

32. Pareja, C., Honey-Roses, J., Kunz, N. C., Fraser, J., & Xavier, A. (2018). What Participation? Distinguishing Water Monitoring Programs in Mining Regions based on Community Participation. *Water Stewardship in Mining Regions*. 10(10), 1010-1325.

<https://www.mdpi.com/2073-4441/10/10/1325>

33. Poscente, M., Chojinzav, T., & Chultemgombo, B. (2022). Mine closure plan for the Salkhit silver mine in Mongolia. *Proceedings of the International Conference on Mine Closure*, 1, 209–224.


[https://doi.org/10.36487/ACG\\_repo/2215\\_12](https://doi.org/10.36487/ACG_repo/2215_12)

34. Provincial Competitiveness Report, 2022. <http://aimagindex.mn/>

35. Prno, J., Pickard, M., & Kaiyogana, J. (2021). Community Engagement during the Environmental Assessment of a Mining Project in the Canadian Arctic. *Environ Manage*. 67(5),

- 1000-1015. <https://pubmed.ncbi.nlm.nih.gov/33528623/>
36. Responsible Mining Index report, 2020. <https://2020.responsibleminingindex.org/en>
37. Selo, P., & Ngole-Jeme, V. (2022). Community Perceptions on Environmental and Social Impacts of Mining in Limpopo South Africa and the Implications of Corporate Social Responsibility. *Journal of Integrative Environmental Sciences*, 19(1), 189-207. <https://www.tandfonline.com/doi/full/10.1080/1943815X.2022.2131827>
38. Serfontein-Jordaan, M., & Dlungwane, S. (2022). Achieving Sustainable Corporate Social Responsibility Outcomes: a Multiple Case Study in the South African Mining Industry. *Communitas*, 27, 1–20. <https://doi.org/10.18820/24150525/Comm.v27.1>
39. Sternberg, Toktomushev, Ichinkhorloo, B. (n.d.). *The Impact of Mining Lifecycles in Mongolia and Kyrgyzstan*. <https://www.routledge.com/The-Impact-of-Mining-Lifecycles-in-Mongolia-and-Kyrgyzstan-Political-Social/Sternberg-Toktomushev-Ichinkhorloo/p/book/9780367563394>
40. Sternberg, T., Mayaud, J. R., & Ahearn, A. (2022). Herd It in the Gobi: Deserting Pastoralism? *Land*, 11(6). <https://doi.org/10.3390/land11060799>
41. Sustainability outlook of Mongolia, 2018. <https://www.unescap.org/resources/sustainability-outlook-mongolia>
42. Sustainable Minerals Institute, Brisbane. Responsible mining in Mongolia: Enhancing Positive Engagement, 2015. <https://www.csr.uq.edu.au/media/docs/1171/j003551-csr-report-conceptweb-mr.pdf>
43. van der Watt, P., & Marais, L. (2021). Implementing social and labour plans in South Africa: Reflections on collaborative planning in the mining industry. *Resources Policy*, 71(January), 101984. <https://doi.org/10.1016/j.resourpol.2021.101984>
44. UNDP (2021). Human Rights Due Diligence Training Facilitation guide. <https://www.undp.org/mongolia/publications/hrdd-training-facilitation-guide>
45. UNDP (2021). [Participatory Environmental Monitoring guide](#). Step without border (SWB)
46. UNDP (2019). Training Manual on Responsible Mining. <https://www.undp.org/mongolia/publications/training-manual-responsible-mining>
47. WWF(2016). Assessment report on the knowledge, attitudes and practices of stakeholders involved in mining decision-making. [https://dcqfgwahwg1cz.cloudfront.net/downloads/kap\\_report\\_mon\\_4.pdf](https://dcqfgwahwg1cz.cloudfront.net/downloads/kap_report_mon_4.pdf)

**Adam Smith International Mongolia LLC**

 2A Temple View Residence, Suhbaatar District – 1  
Ulaanbaatar 15160, Mongolia

 /AMEP2

 info@amep.mn

 www.amep.mn

 976-7000 8595