

## PROPOSED ACTIONS TO THE 2022 EITI ACTION PLAN

### 1. CORRUPTION RISK RELATED TO THE MONITORING AND ACCOUNTABILITY SYSTEM OF PUBLIC SERVANTS

This type of corruption is often motivated by self-interests of public servants who desire to accumulate additional incomes using advantages of official positions and authority, and also by companies and legal entities seeking to speed up the business operations, gain time, skip bureaucratic steps, waive their legal obligations, fees and taxes, and reduce costs.

#### Objective 1.1

To limit human (public servants) involvement, transpire the decisions and decision making steps at all levels (ministries, agencies, local governments) of granting and transferring of mineral licenses, digitize the processes, and propose provisions on enhancing transparency and pushing for digitalization in the draft Mongolian Minerals law.

	Proposed action	Proposed responsible actor (s)	Proposed oversight actor (s)	Timeline	Next steps	Outputs/Outcomes/Indicators of progress
1	To conduct detailed assessments of decision making steps related to mineral licenses, contracts, mining plans and reports, environmental impact assessments and reports, and activities of local and specialized inspection authorities as well as the Mineral Resource Professional Council.	MRPAM, The EITI National Secretariat	MMHI	Q1 2022	To make decisions and decision making steps transparent to the public	Situation report on decision making steps
2	To include provisions in the draft Mongolian Minerals law to eliminate bureaucratic steps, transpire the processes, establish monitoring and introduce digitalization of decision making steps in relating to mineral licenses, contracts, mining plans and reports, environmental impact assessments and reports, and activities of local and professional inspection authorities as well as the Mineral Resource Professional Council	The EITI National Secretariat	MMHI, MRPAM, MET, MOJHA	Q 3 2022	To submit proposals to the Ministry of Mining and Heavy Industry	Finalized proposals for the draft law

3	<p>To submit proposals on including provisions in the draft Mongolian Minerals law to introduce “open data format” on all publicly available information in relation to decision making steps on mineral licensing, contracts, mining plans and reports, environmental impact assessments and reports, and activities of local and professional inspection authorities as well as the Mineral Resource Professional Council to MRPAM, MMHI and other government agencies, and work on enhancing transparency in close cooperation with EITI.</p>	The EITI National Secretariat	MMHI, MOJHA	Q 4 2022	To arrange a meeting on recommendations which will be submitted to relevant government agencies	Implemented recommendations
4	<p>To submit proposals to the MMHI to update and improve the “Regulations for license tendering” in the following areas:</p> <ol style="list-style-type: none"> <li>1. To clarify procedures for license tendering, such as pushing for procedural digitalization and open and transparent operation</li> <li>2. To establish arrangements to include representatives of civil society, professional associations and third parties in the selection commission (working group) of license tendering</li> <li>3. The selection commission shall set a standard to transpire its decisions and decision-making steps and inform validity on the decisions.</li> </ol>	The EITI National Secretariat	MMHI, MRPAM, MNCCI, Relevant associations	Q 2 2022	To develop specific proposals which will be included in the procedure and organize discussions with relevant organizations	To include relevant amendments to the procedure

## 2. CORRUPTION RISK CAUSED BY EXTRACTIVE COMPANIES SEEKING TO UNDERMINE COMPETITION

This type of corruption is motivated by extractive companies' interests to avoid risks of new competitors, protect market share of sales, service, supply and contracting to competitors, maintain all types of permits and licenses, prevent new competitors entering their business sector and maintain established prices for products, raw materials and other works.

### Objective 2.1

To disclose criteria, selection process and decision for recruiting political elites for senior executive positions, such as directors or board members, other senior positions and consultants of SOEs, top companies and legal entities in the extractive sector.

Proposed action	Proposed responsible actor (s)	Proposed oversight actor (s)	Timeline	Next steps	Outputs/Outcomes/Indicators of progress
1 To propose draft of amendments on gathering information on former and current politically exposed persons and beneficial owners, disclosing of such information and verification of the creditability of the information to relevant laws, and submit the proposals to the Cabinet Secretariat	The EITI National Secretariat	MMHI, MOJHA, IAAC	Q 1 and Q2, 2022	To develop a criteria, selection process, declaration form, disclosure template and procedure in line with the proposed amendments	Final version of draft of amendments to relevant laws; Feedback gathered from line ministries/1 of the line ministers is expected to give a media interview/submitted to the Cabinet Secretariat.
2 To introduce procedures to the relevant government bodies to review and verify information of beneficial owners, and re-verify beneficial ownership information by using random sampling method which will be included in the TOR of the consolidated report under the EITI	MRPAM, The EITI National Secretariat	MMHI, MOJHA, IAAC	Q 1 and Q2, 2022	To establish procedures for updating a beneficial ownership disclosure form and reviewing beneficial ownership information, and include the procedures in the TOR for consolidated report	Procedure will be established and beneficial ownership information will be verified.
3 To develop a information gathering form and disclosure template to disclose criteria, selection process and decision for recruiting former and current politically exposed persons for extractive companies, and develop and	MRPAM, The EITI National Secretariat	MMHI	Q 1 and Q2, 2022	To start collecting the data using a form and template; to develop the necessary training and instructions	Information gathering form; Disclosure template; The procedure will be approved/ The procedure will introduced through a media

	approve the relevant procedure under the EITI reportings				electronically and post them on the EITI website	interview by the Director of the MRPAM/The procedure will be available online.
4	To develop a procedure on conducting an external oversight in verifying declarations of assets and income of senior officials at SOEs in extractive sector under the EITI with cooperation of the IAAC.	The EITI National Secretariat	MMHI	Q 2 and Q3, 2022	To collaborate with relevant government bodies	The procedure will be developed.

### 3. CORRUPTION RISK CAUSED BY OFFICIALS AND AUTHORITY OF LOCAL GOVERNMENT

This type of corruption is caused by the self-interests of local government officials and representatives and also it is induced by private companies and legal entities who give bribes in order to pay lower taxes, fees and charges or evade taxes, be exempted from other obligations imposed by law or initially agreed with the local government, reduce operating costs, and increase business profitability by accepting illegal terms or conditions proposed by senior officials or representatives of local governments.

#### Objective 3.1

To monitor “the accuracy and completeness of disclosures on support, monetary and non-monetary donations given to local communities by extractive companies and legal entities” with public participation

Proposed action	Proposed responsible actor (s)	Proposed oversight actor (s)	Timeline	Next steps	Outputs/Outcomes/Indicators of progress
1 To disclose extractive companies and legal entities’ support given to local communities, monetary and non-monetary donations in a way that is understandable to local communities, and establish a public oversight system in cooperation with the EITI Subcommittee	The EITI National Secretariat	MMHI, IAAC	Q 2 2022	To conduct a survey to monitor that needed information is given to the public;	Gathered disclosures/local communities will be able to monitor based on the disclosures provided to them

2	To raise awareness of ongoing activities on extractive companies and legal entities' support, monetary and non-monetary donations, provide necessary information, and conduct trainings for local communities on related forms, templates and procedures of disclosure	The EITI National Secretariat	MMHI, IAAC	Q 2 and Q3, 2022	To observe the effectiveness of promotion and training	Number of promotions and trainings/Improved disclosures on support and donations given to the local communities/Not less than 50% of aimag and soum communities will be benefitted/
3	To collaborate with the EITI Sub-Committee, NGOs, and the media in providing information on extractive companies and legal entities' support, monetary and non-monetary donations to local communities, receiving feedback, and reporting the outcomes of actions in the EITI Consolidated Report	The EITI National Secretariat	MMHI, IAAC	Q 4 2022	To raise awareness on the EITI Consolidated Report among local communities	Number of posts, media interviews and coverage, updated information through citizen participation

### 3. CORRUPTION RISK CAUSED BY OFFICIALS AND AUTHORITY OF LOCAL GOVERNMENT

This type of corruption is caused by the self-interests of local government officials and representatives and also it is induced by private companies and legal entities who give bribes in order to pay lower taxes, fees and charges or evade taxes, be exempted from other obligations imposed by law or initially agreed with the local government, reduce operating costs, and increase business profitability by accepting illegal terms or conditions proposed by senior officials or representatives of local governments.

#### Objective 3.2

To organize training courses and awareness raising activities among locals on potential interactions (legal, economic, environmental relations, rehabilitation, cooperation, donations, etc.) between local communities and extractive companies and legal entities, corruption risks, public interests, locals' participation and public oversight

Proposed action	Proposed responsible actor (s)	Proposed oversight actor (s)	Timeline	Next steps	Outputs/Outcomes/Indicators of progress
-----------------	--------------------------------	------------------------------	----------	------------	---

1	To identify the objectives and needs of training and awareness raising activities on corruption in the extractive sector, and develop a training module	The EITI National Secretariat, IAAC	MMHI, IAAC	Q 1 2022	To develop and structure training and awareness raising activity topics and contents	Developed and structured training contents
2	To organize training courses and awareness-raising activities on corruption in the extractive sector and the role of locals in anti-corruption efforts among local people and communities as planned and scheduled	The EITI National Secretariat, local government, NGOs	MMHI, IAAC	Q 3 and Q4, 2022	To update topics contents, and structures based on the process, effectiveness and participation of training and awareness raising activities, and extend the scope of training and awareness raising activities	Number of local training and awareness raising activities; Number of people involved; Increased transparency of support and donations given to the local communities /At least 2 activities will be organized/

### 3. CORRUPTION RISK CAUSED BY OFFICIALS AND AUTHORITY OF LOCAL GOVERNMENT

This type of corruption is caused by the self-interests of local government officials and representatives and also it is induced by private companies and legal entities who give bribes in order to pay lower taxes, fees and charges or evade taxes, be exempted from other obligations imposed by law or initially agreed with the local government, reduce operating costs, and increase business profitability by accepting illegal terms or conditions proposed by senior officials or representatives of local governments.

#### Objective 3.3

To collaborate with media outlets and NGOs implementing activities aimed at local communities

	Proposed action	Proposed responsible actor (s)	Proposed oversight actor (s)	Timeline	Next steps	Outputs/Outcomes/Indicators of progress
1	The EITI is expected to regularly provide information on its activities to the NGOs implementing activities aimed at local communities and the media and work in close cooperation with them	The EITI National Secretariat	MMHI	Q 1, 2022	To develop a plan to collaborate with the representatives of NGOs and the media	Number of meetings arranged, finalized plan for cooperation/ mutual understanding will be reached

2	The EITI is expected to develop information relevant to local communities, and provide the information to relevant NGOs, the media and local residents; to establish an online platform to receive feedback and verification on the provided information	The EITI National Secretariat	MMHI	throughout 2022	To monitor the efficiency of information	Number of information given transparent to the public; Number of information presented; mutual understanding will be reached
3	To prepare a list of local NGOs and media outlets engaged in the extractive sector who implement activities aimed at local communities, to publish the list on the EITI website, circulate and verify information	The EITI National Secretariat	MMHI	throughout 2022	To update a list	Number of information developed and disseminated to the public /Local people will be given information on NGOs and media outlets operating in their communities

