

This plan was discussed by the Mongolia EITI MSG at meeting No.64 on 23<sup>rd</sup> October 2024, includes feedback from members, and was approved by the 22<sup>nd</sup> National Council Meeting.

**A 2025 WORK PLAN WITH MOTTO “CREATE LEGAL ENVIRONMENT OF EITI, MEETING AND IMPLEMENTING THE REQUIREMENTS OF THE NEW EITI STANDARDS”**

<b>Goal One: Approval of Draft law on transparency in the extractive industry:</b>									
<b>Rational:</b> The regular international independent evaluation of EITI, “Validation,” was held in 2022, and Mongolia was rated “average” with a score of 70 and the EITI Board has decided to implement 33 recommendations in our country by April 1, 2026, and conduct a reassessment. Grants from donors such as the World Bank, the Asian Development Bank, and the European Bank for Reconstruction and Development played an important role in the successful implementation of EITI in Mongolia during the 17 years from 2006 to 2023. But they now consider in the future the Government of Mongolia should lead EITI and fund it, and within this requirement, a draft of standalone law on transparency in extractive industry was developed and transferred to the Ministry of Justice and Internal affairs for final discussion.									
<b>Coordinating organization: Ministry of Justice and Internal affairs</b>									
OBJECTIVES	PLANNED ACTIVITIES	OUTCOME	ORGANIZATION IN CHARGE	TIMELINE	BUDGET		Remark	Organization to control	Implementation
					Amount (000 MNT)	Source			
<b>Objective 1.</b> Organize a discussion on the draft law of transparency in the extractive industry developed in compliance with global standards;	1.1. Reorganize the legal working group;	Law approval will be provided.	MJIA, Secretariat	Jan-Jul	-	-		MJIA	
	1.2. Organize the final discussion;	The draft law will be ready.	Legal working group	Jan-Jul	-	-		MJIA	
<b>Objective 2.</b> Provide preparation to State Great Hural for submission, approval and implementation of the draft law <sup>1</sup> on transparency of extractive industry;	2.1. Submit draft bill to the Cabinet meeting;	Draft bill shall have suggestions from the Cabinet meeting.	MJIA, Legal working group	Jan-Jul	-			MJIA	
	2.2. Submit draft bill to SGH and get approved;	Draft bill is passed.	MJIA	Jan-Jul	-			MJIA	
	2.3. Make sure preparatory work to implement <sup>2</sup> passed law;	Preparatory work shall be insured.	Secretariat	Jul-Dec	-			MJIA	
<b>Needed funds for Goal One achievement</b>									

OBJECTIVES	PLANNED ACTIVITIES	OUTCOME	ORGANIZATION IN CHARGE	TIMELINE	BUDGET		Remark	Organization to control	Implementation
					Amount (000 MNT)	Source			
<b>Goal Two: In compliance with EITI standard, the companies and state organizations shall submit their report through public domain, activate reporting process and engagement.</b>									
<b>Rational:</b> In 2023, the International Secretariat of EITI has sent recommendations to all member countries to switch to the new standard, and based on it, the report forms have been revised and implemented by companies and related government institutions. The importance is for government organizations and companies to ensure transparency in their operations according to the standards, to adopt and implement new requirements, to make their operations clear, and thus to improve accountability.									
<b>Coordinating organization: Ministry of Industry and Mineral Resources</b>									
<b>Objective 3.</b> Ensure requirements of new EITI standard, update reporting system, state	3.1. Organize the system service for companies to prepare reporting through updated EITI reporting system:	Quality of report by companies shall be improved.	Secretariat	Jan-Apr	10,000	State budget		MIMR	

<sup>1</sup> Recommendation No.1 of the 2020 or 15th report of the Mongolian EITI

<sup>2</sup> Prepare a separate implementation work plan.

organizations and all companies implementing project in mineral resources sector 100% have reported;	3.2 Organize reporting by Government organizations through updated EITI reporting system	Quality of report by Government organizations shall be improved.	Secretariat	Jan-May				MIMR	
<b>Objective 4.</b> Increase knowledge, understanding and capacity of specialists of state organizations on routine disclosure, if necessary to be issued government resolution.	4.1. Organize online training with exercises for officials of MOF, MRPAM, GDT, Customs, Social Insurance, and Labor Care agencies, Agency of State Property Policy, and Coordination;	Knowledge and understanding of mentioned organizations shall be improved.	Secretariat	Jan-Dec				MIMR	
	4.2. Organize hybrid training with practical exercises for officials of Local state organizations;	Knowledge and understanding of mentioned organizations shall be improved.	Secretariat	Jan-Dec				MIMR	
<b>Objective 5.</b> Create database of information required by routine disclosure, and improve;	5.1. Update information on Cadaster system with dates of application for license, coordinates of PSAs, results of selection and cancellation data, and make them publicly available.	Data regarding license registration and issue, and PSA will be disclosed.	MRPAM	Jan-Nov	-	-	-	MIMR	
	5.2. Post in the portals and sites of the MOF, MRPAM, GDT, Customs, Social Insurance, and Labor Care agencies, Agency of State Property Policy, and Coordination;	An electronic database has been created as required by the standard.	Related organizations	Jan-Nov	-	-	-	MIMR	
	5.3. Post in the portals and sites of the State owned enterprises;	database has been created as required by the standard.	Erdenes Mongol LLC and Secretariat	Jan-Nov	-	-	-	MIMR	
<b>Objective 6.</b> Insure Contract transparency by the 1 <sup>st</sup> January 2025;	6.1. Upgrade Contract Transparency web site <a href="http://www.iltodgeree.mn">www.iltodgeree.mn</a> ;	Meet the requirements of the standard.	Secretariat				Sponsor	MIMR	
	6.2. Upload contracts concluded in 2020-2024 at <a href="http://www.iltodgeree.mn">www.iltodgeree.mn</a> , conduct monitoring and conclusion;	Meet the requirements of the standard.	Respective organizations concluded contract,	Jan-Dec			Sponsor	MIMR	
	6.3. Organize capacity development training and seminars related to contract transparency;	Capacity shall be developed, and Contract disclosure shall be ensured	Secretariat	Mar-May			Sponsor	MIMR	
	6.4. Include contract-related functions in the job descriptions of aimag governors' contract officials;	Meet the requirements of the standard.	Aimag's governor's administration	Jan-Nov			-	MIMR, Secretariat	
	6.5. Upload sale contracts of State owned companies at <a href="http://www.iltodgeree.mn">www.iltodgeree.mn</a> , organize training on transparency.	Meet the requirements of the standard.	Erdenes Mongol LLC,	Feb-Sep			Sponsor	MIMR, Secretariat	

	6.6. To evaluate reporting and transparency of state-owned companies and to organize campaigns to disclose information required by law;	Meet the requirements of the standard.	Erdenes Mongol LLC	Feb-Sep				MIMR, Secretariat	
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**Needed funds for Goal Two achievement**

**4.000**

**Goal Three: Produce Mongolia EITI 2024 summary report, discuss and endorse it.**

**Rationale:** The 2024 summary report will be prepared according to the 2023 EITI standard and the 2022 Mongolian EITI Validation Report. About 100-130 leading companies will be involved in the report that contribution of the leading companies will be disclosed to the public and report producing meets with the requirements of Validation which to be held in April 2025.

**Coordinating organization: Ministry of Industry and Mineral Resources**

OBJECTIVES	PLANNED ACTIVITIES	OUTCOME	ORGANIZATION IN CHARGE	TIMELINE	BUDGET		Remark	Organization to control	Implementation
					Amount (000 MNT)	Source			
<b>Objective 7:</b> To develop 19 <sup>th</sup> EITI Mongolia 2024 summary report, discuss and approve;	7.1. Approve Scope of work, Establish Evaluation Committee, Selection of Independent Administrator and organize contractual work;	Bidding preparing work in accordance with law shall be ensured.	Evaluation Committee, Multi-stakeholder group (MSG)	Jan-Nov	110,000	State Budget		MIMR	
	7.2. Introduce report, organize discussion and approve;	The Report shall be endorsed.	Independent Administrator, MSG, National Council (NC)	June-Nov				MIMR	
	7.3. Organize press conference, convey information about main result and recommendations for further focus to Media;	Media and public knowing of the consolidated report has increased.	Independent Administrator, MSG, NC representative	Dec				MIMR	

**Needed funds for Goal Three achievement**

**110,000**

**Goal Four: To develop training and advertising work on the importance of using and processing extractive industry information, to increase the availability of information,**

**Rationale:** EITI Board has set up a long- and medium-term objective to increase EITI awareness of public and citizens. Within this goal, EITI implementing countries also set up objectives to convey EITI understanding to public, increase knowledge and information of citizens and implement respectively.

**Coordinating organization: EITI Secretariat**

OBJECTIVES	PLANNED ACTIVITIES	OUTCOME	ORGANIZATION IN CHARGE	TIMELINE	BUDGET		Remark	Organization to control	Implementation
					Amount (000 MNT)	Source			
<b>Objective 8.</b> Develop EIT report and data into more understandable form for citizens and public, increase availability of information;	8.1. Prepare a video story and distribute it through the social media, preparing instructions and prepare the guidance how to obtain information, based on the highlights of the 2024 summary report of Mongolian EITI;	The audience's understanding of the consolidated report key indicators and their significance will be increased.	Secretariat	Jan-May				MIMR	
<b>Objective 9.</b> Activate Information and communication at national level;	9.1 Provide to Aimag Governors and Members of Citizens Rep Hural with info on open data, persuade to use in policy and decisions, organize meeting to support Sub National Councils <sup>3</sup>	Perception and approach of Local authorities shall be improved and foundation for support of Sub National	Secretariat	Mar-Dec				MIMR	

<sup>3</sup> Each aimag should include and implement it in its 2024 EITI Sub-Council Action Plan.

		Councils and cooperation shall be laid.							
<b>Objective 10.</b> Give information and understanding to citizens at local level, advocate activities and convince, promote participation, create partnership forms of cooperation;	10.1. Activate communication activities on EITI at local and regional level, organize online and classroom meetings.	Perception of EITI at local and regional level shall be improved.	NGOs, Secretariat, MMNA	Apr-Nov	-		Sponsor	MIMR	
	10.2. Issue and report Performance agreement between MIMR, and Aimag Governors, Aimag and Sum Governors,	Implementation of Performance agreements will be ensured, and local accountability will increase.	MIMR, Secretariat	Jan-Apr				MIMR	
<b>Objective 11.</b> Develop EI communication and advocacy work and printed materials, print and disseminate;	11.1. Printing works for conferences, trainings and other communications activities;	The public will have better knowledge and perception.	Secretariat	Mar-Nov	3,000	State Budget		MIMR	
	11.2. Communications activities daily mass media such as newspaper and TV, organize discussions;	The public will have better knowledge and perception.	Secretariat	Feb-Dec				MIMR	
<b>Objective 12.</b> Organize internal and external training and experience-based learning to enhance the capacity of EITI stakeholders.	12.1. Organize local training to build the capacity of EITI stakeholders and exchange experiences.	The knowledge and attitudes of stakeholders have improved.	CSOs, Secretariat	Jan-Dec			Sponsor	MIMR	
	12.2 Organize the study of local and foreign experiences of EITI stakeholders.	The knowledge and attitudes of stakeholders have improved.	Secretariat	Jan-Dec			Sponsor	MIMR	

**Needed funds for Goal Four achievement**

**3,000**

**Goal Five: Build up capacity of Subnational Councils.**

**Rationale:** As approved by the National Council, the years 2019 and 2020 have been declared as the year of empowering the sub-councils. However, due to the spread of the Covid-19 pandemic, the Sub-Council empowerment activities have been delayed and, despite being done online, the results have been poor, and since 2021, the Sub-Council empowerment objectives have been specifically included in the work plan. In 2023, within the framework of this goal, the sub-councils continued to be empowered, and in 2025 needs to be strengthened reached level.

**Coordinating organization: EITI Secretariat**

OBJECTIVES	PLANNED ACTIVITIES	OUTCOME	ORGANIZATION IN CHARGE	TIMELINE	BUDGET		Remark	Organiza tion to control	Implementation
					Amount (000 MNT)	Source			
<b>Objective 13.</b> Produce strategy to build-up capacity of Subnational councils.	13.1. Produce strategy to build-up capacity of Subnational councils, trigger activities, develop plan of actions and implement;	Capacity shall be improved as per strategy and plan of actions.	Secretariat	Jan-May				MIMR	
	13.2 Draft Aimag EITI Subnational council Work plan for 2024, and secure funding source of implementation,	Program of activities shall be clear.	Governor's administration of Aimags, Secretariat	Jan-Dec				MIMR	
	13.3 Organize classroom training and meetings for aimag sub-councils in the aimags.	The subnational councils have been empowered.	Governor's administration of Aimags, Secretariat	Jan-Dec	4,500	State Budget		MIMR	

Needed funds for Goal Five achievement						4,500				
<b>Goal 6: To improve the information and registration system aimed at ensuring the transparency of the beneficial owner, Implement new requirements of the EITI Standards.</b> <b>Rationale:</b> The roadmap approved by the EITI National Council in 2016 is being updated and implemented in 2023. In accordance with the law on transparency of public information, the information of the beneficial owner of all legal entities registered in Mongolia is made public. However, it is necessary to continue to implement in 2025 the remaining tasks in the roadmap, such as strengthening the capacity of government institutions that collect the information, verifying the information of the beneficial owner and increasing public awareness. The EITI Standards updated in 2023 that creating the opportunity to implement additional requirements. <b>Coordinating organization: Ministry of Industry and Mineral Resources</b>										
OBJECTIVES	PLANNED ACTIVITIES	OUTCOME	ORGANIZATION IN CHARGE	TIMELINE	BUDGET		Remark	Organization to control	Implementation	
					Amount (000 MNT)	Source				
<b>Objective 14:</b> Use and disseminate beneficial owners' data collected in the Mongolia EITI Reports 2013-2023, develop E-reporting;	14.1. Set up a working group of Governmental Institutions on the information of the beneficial owner and meet once per quarter.	Activities in regard to disclosing BO shall be coordinated.	Secretariat	Feb-Nov				MIMR		
<b>Objective 15:</b> Develop system for collection of beneficial ownership information, improve institutions capacity for verification the data reliability;	15.1. Organize training to provide methodological advice to the State Registration, which records and receives information on beneficial ownership, conducts a sample review of the information disclosed, and plans future activities.	Mechanism of data collection, exchanging shall be up-to-dated.	Secretariat	Feb-Jun			Sponsor	MIMR		
<b>Objective 16.</b> Organize training to introduce, promote, and raise awareness of new EITI requirements related to the energy transition;	16.1. Organizing stakeholder discussions on energy transition issues, developing, approving, and implementing a roadmap.	A unified position has been reached through mutual consultation.	Secretariat	Feb-Jun			Sponsor	MIMR		
	16.2 Organize pilot reporting on carbon emissions regarding the "Trillion Trees" program.	It will be possible to collect, report, and monitor data.	Secretariat	Feb-Jun			Sponsor	MIMR		
<b>Objective 17.</b> Organize training to introduce, promote, and raise awareness of the new EITI requirements for corruption prevention.	17.1 Organizing stakeholder discussions on corruption prevention issues, developing, approving, and implementing a roadmap.	The mechanism for collecting and exchanging information has been improved.	Secretariat	Feb-Jun	1,500	State budget		IAAC /MIMR		
	17.2 The legal entity holding the special license must have internal rules to prevent corruption.	The risk of corruption has decreased.	Secretariat	Feb-Jun				IAAC /MIMR		
	17.3 Organize ethics training for members of the National Council and Working Group.	Ethical awareness will improve and the risk of corruption will decrease.	Secretariat	Feb-Jun	1,500	State budget		PWYP		
<b>Objective 18.</b> Implement the recommendations provided in the annual consolidated reports of the Mongolian EITI.	18.1 Establishing a working subgroup of stakeholders and organizing joint implementation <sup>4</sup> .	To meet international requirements.	Secretariat	Jan-Dec	1,000	State budget		MIMR		
<b>Objective 19.</b> Implement the 33 recommendations from the International Secretariat 2022 Validation and prepare for the next 2026 Validation.	19.1 Establishing a working subgroup of stakeholders and organizing joint implementation <sup>5</sup> .		Secretariat	Jan-Dec	1,000	State budget		MIMR		

<sup>4</sup> A separate plan has been drawn up.

<sup>5</sup> A separate plan has been drawn up.

<b>Needed funds for Goal Six achievement</b>					<b>3,000</b>				
<b>Total cost amount</b>					<b>State budget- 130,500 thousand tugrug, Sponsor ... .. thousand tugrug</b>				

**Follow-up activities under given recommendations of Mongolia 2018, 2019, 2020,2021,2022 and 2023 Summary Reports.**

<b>Objective 20:</b> Implement recommendations given by Mongolia EITI 2018 and 2019 Reports;	20.1. All data related to extractive sector should be collected at MIMR, and disseminate to other Government institutions;	Information gap shall be resolved.	Secretariat	Jan-Dec	-	-	Article 13.2 of the EITI law draft <sup>6</sup> stipulates that the "Mineral Resource Extraction Industry Database shall be the responsibility of the government organization in charge of mining and geology."	MIMR, PWYP coalition	
	20.2. Local administration will place all received donations at own website, Aimag audit department should do audit on funds and donations.	Availability of information shall be increased.	Respective Governor's office of Aimags		-	-	According to the 2023 State Budget Law, donations will be received and registered in the Local Development Fund.	Aimag Audit department, MIMR, PWYP coalition	
	20.3. Audited financial statements of companies will be placed at EITI website separately;	Availability of information shall be increased.	Secretariat		-	-	Organizations must post their own information in accordance with the Law on Transparency of Public Information.	MIMR, PWYP coalition	
	20.4. Disclose members of Board of State-owned Enterprises, procedure of election of independent members and make publicly available;	Availability of information shall be increased.	Secretariat		-	-	The recommendation of the 2021 report "Disclosing the members of the Board of Directors of state-owned enterprises and informing the public about the methods and procedures used to select external independent members" is reflected in Article 8.6.6 of the Law on Transparency of Public Information and started to be implemented.	MIMR, PWYP coalition	
	20.5. Disclose minutes of meeting of Board of SoEs;	Availability of information shall be increased.	Secretariat	Jan-Dec	-	-	We have a suggestion to resolve this issue within the framework of the EITI law.	MIMR, PWYP coalition	
	20.6. Place Companies' plan and report of Environment impact assessment and management at EITI website separately;	Availability of information shall be increased.	Secretariat	Jan-Dec	-	-	In the EITI draft law <sup>7</sup> , articles 7.1.10c and 7.1.15a include relevant provisions.	MIMR, PWYP coalition	
	20.7. Multi-Stakeholder Group (MSG) should study major extractive companies and contractors in order to preselect those companies that make significant contribution to the state budget, and give official notification to such companies before entering their general information on the e-reporting system as well as enable the condition for them to submit reports and finally include them in	Availability of information shall be increased.	Secretariat	Jan-Dec			We have a suggestion to resolve this issue within the framework of the EITI law.	MIMR, PWYP coalition	

<sup>6</sup> EITI draft law- <https://mojha.gov.mn/contentList/62dfcd0a3982fa3c90f2a7da>

<sup>7</sup> EITI draft law- <https://mojha.gov.mn/contentList/62dfcd0a3982fa3c90f2a7da>

	the reconciliation.								
	20.8 Annual reconciliation reports provide recommendations for companies and government agencies on how to submit EITI reports and ensure the accuracy of the reports submitted, but no significant progress has been made so far. This shows the importance of adopting and enforcing the law on Transparency of Minerals Standard.	Availability of information shall be increased.	Secretariat	Jan-Dec			Opinions on the EITI law draft <sup>8</sup> are being sought through the website of the Ministry of Justice and Internal Affairs. We have a suggestion to resolve this issue within the framework of the EITI law.	MIMR, PWYP coalition	
	20.9. Changes to the law has affected the procedure of Mongolian Tax Authority to impose royalty and payment from companies, however, it did not affect controls over accurate EITI reporting, imposing royalty and its payment. For this reason, MTA should improve their information system and expected to continue focusing accurate reporting to the EITI.	Availability of information shall be increased.	Mongolian Tax Authority	Jan-Dec			In March 2019, the Law on Mining and Mineral Resources was amended, increasing the royalty on gold sold to the Bank of Mongolia and its authorized commercial banks to 5.0 percent. Therefore, it is necessary to study how this affects the royalty levy and payment by gold mining companies and individuals, to focus on improving the relevant information system in the future, and to ensure that individuals and companies accurately report their reports to the EITI.	MIMR, PWYP coalition	
	20.10. Differences in information between the MRPAM cadastre system and the EITI electronic system need to be resolved, and an electronic reporting system needs to be run on a single source. Information on common mineral licenses issued in rural areas should be entered into the cadastral system without delay and made available to the public.	Availability of information shall be increased.	Mineral Resources and Petroleum Authorities, Secretariat	Jan-Dec			Expecting	MIMR	
	20.11 Stakeholders must verify the information they receive electronically and make it available to the public, or information on selected companies should be evaluated and improved by an independent administrator and made public.	Availability of information shall be increased.	Secretariat	Jan-Dec			We have a suggestion resolve this issue within the framework of the EITI law.	MIMR, PWYP coalition	

<sup>8</sup> EITI draft law- <https://mojha.gov.mn/contentList/62dfcd0a3982fa3c90f2a7da>

	<p>20.12. MSG should pay attention to the fact that as the involvement of independent administrator decreases, the quality and accuracy of the data will be more crucial when taking actions below:</p> <p>1. Provide training and consulting to entities not reporting the information with most discrepancies or not taking responsibility to report.</p> <p>2. Official letter of Mongolia EITI 2019 reconciliation report should be delivered and be advised on cooperation. Official letter of Mongolia EITI 2019 reconciliation report should be delivered and be advised on cooperation.</p>	<p>Reports shall be produced in a timely manner.</p> <p>The quality of reports should be improved.</p>	<p>Secretariat</p> <p>Secretariat</p>	<p>Jan-Dec</p>		<p>It is proposed to organize the training in January-February 2025.</p> <p>The report is posted on the website.</p>	<p>MIMR</p>	
<p><b>Objective 21:</b> Implement the recommendations given by the Mongolia EITI 2020 Report.</p>	<p>21.1 It is required that transparency reports produced by the government should be verified by the National Audit Organization, and company reports should be verified by an independent audit.</p>	<p>The quality of reports should be improved.</p>	<p>Secretariat</p>	<p>Aug</p>		<p>In the draft of the EITI law<sup>9</sup>, Articles 17.3 and 18.4 include relevant provisions.</p>	<p>MIMR, PWYP coalition</p>	
<p><b>Objective 22:</b> Implement the recommendations given by the Mongolia EITI 2021 Report.</p>	<p>22.1 Improve the quality of information, taking into account that problems related to inconsistencies between government revenue and company payments are common every year.</p>	<p>The quality of reports should be improved.</p>	<p>Secretariat</p>	<p>Jan-Dec</p>		<p>It is improving EITI's electronic reporting system that reduces errors.</p>	<p>MIMR, PWYP coalition</p>	<p>It is proposed to submit an official letter to the State Secretary of the MIMR.</p>
	<p>22.2 Setting up the program for the electronic reporting system to ensure that the information uploaded to the electronic reporting system is complete and error-free.</p>	<p>The quality of reports should be improved.</p>	<p>Secretariat</p>	<p>Jan-Dec</p>		<p>It is improving EITI's electronic reporting system that reduces errors.</p>	<p>MIMR</p>	
	<p>22.3 In the coming years, make the consolidated report of EITI in a way that is not flexible and includes more companies, and decide on the budget for this.</p>	<p>Report coverage has improved.</p>	<p>Secretariat</p>	<p>Jan</p>		<p>The consolidated report for 2022 is being prepared using the traditional method. This time, 104 companies are participating.</p>	<p>MIMR</p>	<p>Implemented</p>
	<p>22.4 Consider and pay attention to reporting more data and making them user-friendly and specific.</p>	<p>The usage of reports should be improved.</p>	<p>Secretariat</p>	<p>Jan-Dec</p>		<p>The EITI E-reporting system is being improved, and it will be easy for users to understand the report.</p>	<p>MIMR</p>	

<sup>9</sup> EITI draft law- <https://mojha.gov.mn/contentList/62dfcd0a3982fa3c90f2a7da>



	22.5 Improve the transparency of contracts. For example, make transparent the information and regulations of the contracts that do not need to be kept confidential. Submit the contract database to the government to streamline operations.	Contract disclosure should be improved.	Secretariat	Jan-Dec			In the draft of the EITI law <sup>10</sup> , relevant provisions were included in Article 7.13.	MIMR, PWYP coalition	
<b>Objective 23:</b> Implement the recommendations given by the Mongolia EITI 2022 Report.	23.1 The Ministry of Industry and Mineral Resources, the Ministry of Finance, and other relevant organizations should pay special attention to ensuring that all SOEs participating in the merger submit their transparency reports without errors and in full.	Meets international standards	Secretariat	Jan-Dec			State Secretary of the Ministry of Industry and Mineral Resources sent an official letter in November. The task of developing a plan was assigned.	MIMR	
	23.2 Companies and government agencies should make progress in bringing about qualitative changes in the EITI reporting process, making it a norm and ensuring the accuracy of reports.	Meets international standards	Secretariat	Jan-Dec			State Secretary of the Ministry of Industry and Mineral Resources sent an official letter in November. The task of developing a plan was assigned. Official letters were sent to government agencies.	MIMR	
	23.3 The process of obtaining complete information on the implementation of EITI requirements from state-owned enterprises is not clear. Therefore, it is important to ensure the implementation of standards and requirements.	Meets international standards	Secretariat	Jan-Dec			State Secretary of the Ministry of Industry and Mineral Resources sent an official letter in November. The task of developing a plan was assigned.	MIMR	
<b>Objective 24:</b> Implement the recommendations given by the Mongolia EITI 2023 Report.	24.1 To reduce the gap between government revenues and company payments, improve the rate of data entry into the reporting system, especially focusing on the complete entry of data from local authorities.	Access to information has increased.	Secretariat	Jan-Dec			Organize training for local organizations.	MIMR	
	24.2 Send specific recommendations and appeals to entities that do not publish their information transparently and do not fully enter their information into the reporting system.	Access to information has increased.	Secretariat	Jan-Dec			Submit recommendations and make appeals.	MIMR	
	24.3 Remind aimag and district governor's administration departments to pay attention to fully entering information into the reporting system by the stated deadline each year, and give them time-bound tasks.	Access to information has increased.	Secretariat	Jan-Dec			Send an official letter of State Secretary of the MIMR on January 2025.	MIMR	
	24.4 Organize training and awareness-raising activities to empower data entry staff to enter data accurately and completely into	Access to information has increased.	Secretariat	Jan-Dec			Organize training for staff who will work on the report.	MIMR	

<sup>10</sup> EITI draft law- <https://mojha.gov.mn/contentList/62dfcd0a3982fa3c90f2a7da>

	the EITI electronic reporting system.								
	24.5 Transparency reports submitted to the electronic reporting system should be monitored by civil society and research organizations.	Reporting controls have improved.	Secretariat	Jan-Dec			Conduct research by CSOs.	MIMR, PWYP	
	24.6 To clarify incomplete or inaccurate information reported within the scope of the consolidated report disclosure and to take action against employees and officials who fail to respond to official requests for additional information or refuse to provide information;	Reporting controls have improved.	Secretariat	Jan-Dec			Post the names of companies and organizations whose names appear in the 2023 Consolidated Report on the website.	MIMR	
	24.7 It is mandatory to extend the deadline and collect information from the companies that have not submitted their reports on time to the electronic reporting system.	Reporting controls have improved.	Secretariat	Jan-Dec			Configure the system.	MIMR	
	24.8 Since the widespread errors and bureaucracy in the clarification process are related to the work responsibilities of the responsible staff, organize impactful actions to improve staff accountability;	Reporting controls have improved.	Secretariat	Jan-Dec			Organize training for staff who will work on the report.	MIMR	
	24.9 Organize training and outreach activities on entering information into the Electronic Reporting System for responsible staff of the Aimag and District Governors' Administration;	Reporting controls have improved.	Secretariat	Jan-Dec			Organize training for local organizations.	MIMR	
	24.10 Configure the software in the electronic reporting system to ensure that the information uploaded to the electronic reporting system is accurate and complete.	Access to information has increased.	Secretariat	Jan-Dec			Configure the system.	MIMR	
	24.11 Although the electronic reporting system has been updated and improved, there were several issues to consider during the preparation of the consolidated report. For example, the information entered by the companies and organizations that submitted information could not be downloaded in Excel format, and it was not possible to see how many companies had entered information on each form indicator. These issues should be addressed in order to improve the system.	The quality of information has improved.	Secretariat	Jan-Dec			Configure the system.	MIMR	

**Action plan to implement recommendations from the Mongolia EITI 2022 Validation Report;**

<b>Objective 25:</b> Implement recommendations given by Mongolia EITI 2022 Validation Report;	25.1 Develop the 2023 action plan of EITI in accordance with international standards, review and make relevant amendments in the first half of the year.	The quality of the work plan should be improved.	Secretariat	Jan-Dec			The Work Plan for 2023 has been developed and approved in accordance with the requirements of EITI standards. <sup>11</sup>	MIMR	
	25.2 Provide capacity-building training for members of local CSOs.	The capacity of NGOs should be improved.	Secretariat	Jan-Dec			In cooperation with civil society organizations, we aim to increase their skills.	MIMR, PWYP coalition	
	25.3 Coding of EITI and other data and information to make it open and provide the possibility to compare with other data and information available to the public.	The utilization of data should be improved.	Secretariat	Jan-Dec			There is an updating EITI E-reporting system that will be the foundation for open data.	MIMR	
	25.4 To monitor the implementation of the recommendations given in the annual EITI Report, to conduct self-evaluation, to establish working sub-groups, and to regulate the presentation of results to the working group and the National Council.	Self-monitoring and control should be improved.	Secretariat	Jan-Dec			All recommendations received have been included in the work plan and the draft law of the EITI.	MIMR	
	25.5 To make a statement by senior government officials about the Government of Mongolia's commitment to the implementation of EITI in Mongolia.	It will be a good step to improve the reputation of Mongolia.	Secretariat	Jan-Dec			Expecting	MIMR	
	25.6 Improving and regularizing the participation of representatives and management of companies participating in EITI activities.	The company's activity and involvement should be improved.	Secretariat	Jan-Dec			Expecting	MIMR	
	25.7 Organize a national discussion on the results and recommendations of the validation.	The common consensus and objectives should be made available.	Secretariat	Jan-Dec			Organized a workshop in cooperation with the International Secretariat in June. Established a subworking group.	MIMR	
	25.8 Revise the regulations of the Mongolian National Council and Working Group of the EITI to increase gender representation and include additional requirements in the direction of ethics;	Meets the requirements of international standards.	Secretariat	Jan-Dec			Expecting	MIMR	
	25.9 To develop and exchange information with the National Geological Service in the field of systematic disclosure of ongoing and planned exploration operations and geological information.	Meets the requirements of international standards.	Secretariat	Jan-Dec			In the draft of the EITI law <sup>12</sup> , relevant provisions were included in Article 7.1.5.	MIMR	

<sup>11</sup> <https://www.eitimongolia.mn/p/10>

<sup>12</sup> EITI draft law- <https://mojha.gov.mn/contentList/62dfcd0a3982fa3c90f2a7da>

	25.10 Disclosure of employment in the mining sector by gender, company, workplace, and breakdown of informal mining activities.	Meets the requirements of international standards.	Secretariat	Jan-Dec			In the draft of the EITI law <sup>13</sup> , relevant provisions were included in Article 7.1.14	MIMR	
	25.11 Systematic disclosure and citizen participation in monitoring by public institutions and regulations.	Meets the requirements of international standards.	Secretariat	Jan-Dec			Expecting	MIMR	
	25.12 Regularly update the contract transparency website and fully disclose all contracts, amendments, special licenses, and annexes established after January 1, 2021.	Meets the requirements of international standards.	Secretariat	Jan-Dec			Expecting	MIMR	
	25.13 Disclosure of legal provisions and administrative acts related to environmental management and investment monitoring in the extractive industry.	Meets the requirements of international standards.	Secretariat	Jan-Dec			In the draft of the EITI law <sup>14</sup> , relevant provisions were included in Article 7.1.1, 8.1.1, 9.1.1, and 10.1.1.	MIMR	
	25.14 Disclosure of all license information, including newly issued, transferred, direct and tender licenses.	Meets the requirements of international standards.	MRPAM	Jan-Dec			In the draft of the EITI law <sup>15</sup> , relevant provisions were included in Article 7.1.2.	MIMR	
	25.15 Disclosure of the application, issuance, and expiration dates of each license.	Meets the requirements of international standards.	MRPAM	Jan-Dec			In the draft of the EITI law <sup>16</sup> , relevant provisions were included in Article 7.1.2.	MIMR	
	25.16 Disclosure of information on the beneficial owners, including their level of ownership and detailed information on how they control ownership (such as their name, country of affiliation, citizenship, country of residence, and whether they are politically influential persons).	Meets the requirements of international standards.	General Authority for State Registration (GASR)	Jan-Dec			In accordance with Article 8.6.19 of the Law on Transparency of Public Information, which came into effect in 2022, the beneficial owner of the company has been disclosed. In the draft of the EITI law <sup>17</sup> , relevant provisions were included in Article 7.1.11.	MIMR	
	25.17 Disclosure of applicable rules and regulations governing financial relations between the government and SOEs, including annual disclosures explaining reinvestment and third party financing.	Meets the requirements of international standards.	Secretariat	Jan-Dec			In the draft of the EITI law <sup>18</sup> , relevant provisions were included in Article 7.1.2.	MIMR	

<sup>13</sup> EITI draft law- <https://mojha.gov.mn/contentList/62dfcd0a3982fa3c90f2a7da>

<sup>14</sup> EITI draft law- <https://mojha.gov.mn/contentList/62dfcd0a3982fa3c90f2a7da>

<sup>15</sup> EITI draft law- <https://mojha.gov.mn/contentList/62dfcd0a3982fa3c90f2a7da>

<sup>16</sup> EITI draft law- <https://mojha.gov.mn/contentList/62dfcd0a3982fa3c90f2a7da>

<sup>17</sup> EITI draft law- <https://mojha.gov.mn/contentList/62dfcd0a3982fa3c90f2a7da>

<sup>18</sup> EITI draft law- <https://mojha.gov.mn/contentList/62dfcd0a3982fa3c90f2a7da>

	25.18 Reporting on the companies that deliver and sell state-owned oil to the market and making the process of selecting the buyer company transparent.	Meets the requirements of international standards.	Secretariat	Jan-Dec			In the draft of the EITI law <sup>19</sup> , relevant provisions were included in Article 7.1.2g	MIMR	
	25.19 Disclosure of complete and accurate information on transfers made by companies above the material level to state-owned enterprises (SOEs), by SOEs to government organizations, and by the government to SOEs.	Meets the requirements of international standards.	Secretariat	Jan-Dec			In the draft of the EITI law <sup>20</sup> , relevant provisions were included in Article 7.1.2. e	MIMR	
	25.20 Develop an EITI process to disclose quasi-budgetary expenditures of SOEs with significant payments and ensure their transparency is on par with other payments and revenue streams, including subsidiaries and branches of SOEs.	Meets the requirements of international standards.	Secretariat	Jan-Dec			In the draft of the EITI law <sup>21</sup> , relevant provisions were included in Article 7.1.2.e	MIMR	
	25.21 Timely collection and public disclosure of production volumes and prices of all manufactured mineral products for each product.	Meets the requirements of international standards.	MRPAM	Jan-Dec			In the draft of the EITI law <sup>22</sup> , relevant provisions were included in Article 7.1.6.	MIMR	
	25.22 Systematically disclose information on export products, breaking down this information in detail by region and company alliance, and disclose the methodology for calculating export volumes and prices.	Meets the requirements of international standards.	MRPAM	Jan-Dec			In the draft of the EITI law <sup>23</sup> , relevant provisions were included in Article 7.1.6.	MIMR	
	25.23 All material payments made by mining, oil, and natural gas companies to the government, as well as all material income received by the government from mining, oil, and natural gas companies, shall be fully available to the public. This information should be easily accessible and provided in a comprehensive manner.	Meets the requirements of international standards.	Secretariat	Jan-Dec			In the draft of the EITI law <sup>24</sup> , relevant provisions were included in Article 7.1.7.	MIMR	

<sup>19</sup> EITI draft law- <https://mojha.gov.mn/contentList/62dfcd0a3982fa3c90f2a7da>

<sup>20</sup> EITI draft law- <https://mojha.gov.mn/contentList/62dfcd0a3982fa3c90f2a7da>

<sup>21</sup> EITI draft law- <https://mojha.gov.mn/contentList/62dfcd0a3982fa3c90f2a7da>

<sup>22</sup> EITI draft law- <https://mojha.gov.mn/contentList/62dfcd0a3982fa3c90f2a7da>

<sup>23</sup> EITI draft law- <https://mojha.gov.mn/contentList/62dfcd0a3982fa3c90f2a7da>

<sup>24</sup> EITI draft law- <https://mojha.gov.mn/contentList/62dfcd0a3982fa3c90f2a7da>

25.24 It is necessary to take into account whether there is an agreement to receive goods or services (including loans, guarantees, infrastructure development) or to obtain mineral resources in whole or in part for the granting of the right to extract minerals, oil, or natural gas. This includes collateral-backed loans that meet the definition of barter-type transactions in Requirement 4.3.	Meets the requirements of international standards.	Secretariat	May			In the draft of the EITI law <sup>25</sup> , relevant provisions were included in Article 7.1.13.	MIMR	
25.25 Taking measures to disclose additional information about transportation contracts in the extractive industry, including the types of products being transported, transportation routes, and enterprises and organizations involved in transportation.	Meets the requirements of international standards.	Secretariat	May			In the draft of the EITI law <sup>26</sup> , relevant provisions were included in Article 7.1.6.	MIMR	
25.26 Disclosure of all revenues from the government's mineral resources sector and all taxes and fees paid by extractive companies on a project-by-project basis.	Meets the requirements of international standards.	MTA	May			Expecting	MIMR	
25.27 Search for innovative methods of reporting on EITI and, based on the currently operating government portals, provide timely and accurate disclosure of information that meets the needs of government, industry, and civil society stakeholders.	Meets the requirements of international standards.	Secretariat	Aug			Expecting	MIMR	
25.28 Verify information reported annually by companies claiming to have been paid and received by government agencies is true, verified by an independent audit, and conforms to international auditing standards.	Meets the requirements of international standards.	Secretariat	May			In the draft of the EITI law <sup>27</sup> , relevant provisions were included in Article 7.1. 3 and 18.4.	MIMR	
25.29 Public disclosure of the income collected from the extractive sector, whether cash or non-cash, recorded in the state budget.	Meets the requirements of international standards.	Secretariat	Jun			Expecting	MIMR	
25.30 Further use of EITI as a method for quick and transparent information with the aim of improving public understanding of	Meets the requirements of international standards.	Secretariat	Jun			Expecting	MIMR	

<sup>25</sup> EITI draft law- <https://mojha.gov.mn/contentList/62dfcd0a3982fa3c90f2a7da>

<sup>26</sup> EITI draft law- <https://mojha.gov.mn/contentList/62dfcd0a3982fa3c90f2a7da>

<sup>27</sup> EITI draft law- <https://mojha.gov.mn/contentList/62dfcd0a3982fa3c90f2a7da>

	income stability and dependence on mineral resources.								
	25.31 Full disclosure of taxes paid by companies above the material level and revenues received by the state at the local level, by province and sub-district.	Meets the requirements of international standards.	Secretariat	Aug			In the draft of the EITI law <sup>28</sup> , relevant provisions were included in Article 7.1.7.	MIMR	
	25.32 Disclosure of all payments transferred to local communities (provinces and sums) from the government's income from the extractive industry sector.	Meets the requirements of international standards.	Secretariat	Aug			In the draft of the EITI law <sup>29</sup> , relevant provisions were included in Article 7.1.8.	MIMR	
	25.33 Disclosure of social material expenditures required by law for companies, including amounts specified in the Local Development Agreement or investment-related agreements.	Meets the requirements of international standards.	Secretariat	Aug			In the draft of the EITI law <sup>30</sup> , relevant provisions were included in Article 7.1.3. d	MIMR	

**Mongolia EITI Secretariat**

<sup>28</sup> EITI draft law- <https://mojha.gov.mn/contentList/62dfcd0a3982fa3c90f2a7da>

<sup>29</sup> EITI draft law- <https://mojha.gov.mn/contentList/62dfcd0a3982fa3c90f2a7da>

<sup>30</sup> EITI draft law- <https://mojha.gov.mn/contentList/62dfcd0a3982fa3c90f2a7da>