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HIGH REPRESENTATIVE
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JOINT STAFF WORKING DOCUMENT

The EU Special Incentive Arrangement for Sustainable Development and Good Governance (GSP+) assessment of Mongolia covering the period 2023-2025

Accompanying the document

Joint Report to the European Parliament and the Council

on the Generalised Scheme of Preferences covering the period 2023-2025

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1. Executive Summary

Mongolia has benefitted from the EU's Special Incentive Arrangement for Sustainable Development and Good Governance of the Generalised Scheme of Preferences (GSP+) since 2014. The country used GSP+ preferences for 15 % of its total exports to the EU in 2024 (a large share of the country's exports enters the EU duty-free under the normal tariff regime).

The preference utilisation rate for GSP+ stood at 78 % in the same year. The World Bank reclassified Mongolia from a lower-middle income country to an upper-middle income country (UMIC) on 1 July 2024. If Mongolia classifies as an UMIC the third year in a row in July 2026, it will graduate from GSP+ by 1 January 2028.

Mongolia's compliance with its obligations under the EU's GSP+ during the 2023-2025 reporting period¹ reflects partial progress in meeting international commitments, alongside some challenges. The country has maintained its ratification of all 27 GSP+ related conventions and has not formulated incompatible reservations.

Mongolia has demonstrated commitment to aligning its legal framework with the GSP-related human rights conventions, although the full assessment of the latest laws is still premature. Positive developments include the adoption of laws aimed at increasing gender representation in the national Parliament, protecting children, securing the right of public demonstrations, and improving social insurance. However, challenges remain in particular in areas such as violence against women and children, anti-discrimination, arbitrary arrest, occasional use of torture by police, and the use of legislation on defamation and on official and state secrets to curtail criticism of the government and revelations of corruption. As regards labour rights, despite some positive legislative developments, serious concerns persist regarding freedom of association, discrimination at the workplace and child labour. In the cluster of international environment and climate conventions, Mongolia's performance is poor, reporting is uneven and, in several cases, long overdue. On good governance, strengthening the capacity of anti-corruption agencies and enhancing the effectiveness of legal frameworks will be crucial.

To ensure continued GSP+ eligibility and further increased compliance with international commitments, in particular in view of the revised GSP rules as of 2027, the following priorities for future engagement stand out: improving the functioning of the justice system; stepping up the fight against corruption; taking decisive steps to eliminate child labour in all sectors; compliance with international reporting obligations needs to be improved, in particular in the cluster of environment and climate conventions.

2. Key developments

2.1 Political and economic developments

The political landscape has seen notable changes since the last report, including constitutional reforms in 2023, a succession of political crises in 2024 and 2025, the change of Prime Minister and Speaker, and a significant increase of the President's political weight. In 2023, constitutional amendments increased the size of the Parliament (State Great Khural) from 76 to 126 members and introduced a mixed electoral system, combining majoritarian and proportional representation mechanisms². The 2024 parliamentary elections were assessed as generally well administered, although observers noted campaign restrictions, use of state resources in support of the incumbent party and biased public media coverage³.

After a series of protests over corruption in the mining sector during 2022, Mongolia adopted a new National Anti-Corruption Strategy for 2023-2030, entailing 11 goals to combat political,

social, and economic corruption, which was approved by the Parliament in May 2024⁴. Senior politicians continue not to be indicted in corruption cases.

Underfinancing of public education and public health led to major demonstrations in 2024. A lack of investment in energy infrastructure in recent decades, combined with subsidised electricity prices and the state monopoly on electricity regularly leads to power cuts. The dependence on Russia for petrol also leads to frequent shortages. The strong dependence on China for its coal exports, which forms the bulk of Mongolia's total exports, as well as a continuing brain drain add to the economic challenges.

Since the last review, Mongolia's economy has experienced significant volatility, marked by alternating periods of rapid growth and emerging vulnerabilities. In 2023, growth in real GDP accelerated to 7.4 %, driven by strong coal exports. However, growth slowed in 2024 due to a sharp contraction in agriculture caused by a harsh winter⁵. According to the International Monetary Fund (IMF), in the medium term (2025-2030), growth is expected to converge at its potential of about 5 %⁶.

2.2 GSP+ trade impact

Between 2022 and 2024⁷, EU exports to Mongolia grew from EUR 627 million to EUR 801 million, a 13 % annual growth rate, while imports decreased by EUR 15 million over the same period. In 2024, imports from the country represented 0.005 % of the EU's total imports.

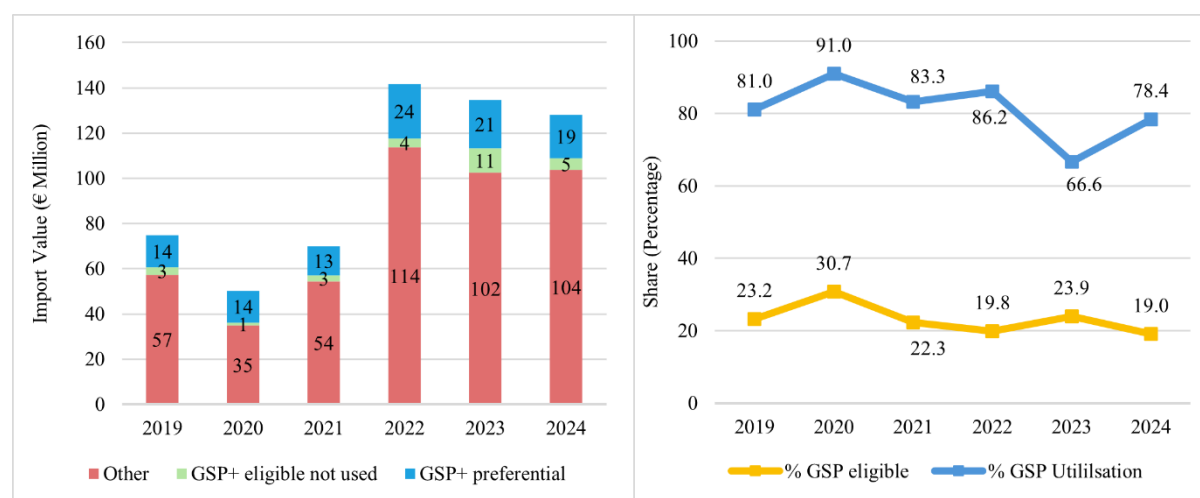
The EU was Mongolia's fourth-largest export destination, but only accounted for 1 % of its total exports, compared to China's 91 % market share. On the import side, the EU also ranked fourth among Mongolia's sourcing markets (8 %), well behind China (40 %), Russia (24 %) and Japan (10 %). Wool (EUR 57 million) was the EU's most imported commodity from the country, followed by ores (EUR 24 million).

Between 2022 and 2024, total EU imports from Mongolia declined from EUR 141.8 million to EUR 128 million, corresponding to an average annual decrease of 5.1 %. Imports of GSP+ eligible products decreased from EUR 28.1 million in 2022 to EUR 24.4 million in 2024, while imports actually using GSP+ fell from EUR 24.2 million to EUR 19.1 million over the same period. The GSP+ utilisation rate declined from 86.2 % in 2022 to 66.6 % in 2023, before rising again to 78.4 % in 2024. Logistical issues related to the unique location of Mongolia and its geopolitical situation continue to hamper the implementation of GSP+ in Mongolia. As a result of GSP+, the country benefited from an estimated EUR 1.8 million in tariff exemptions in 2024. This corresponded to around 1.4 % of Mongolia's export value to the EU in 2024.

Figure 1. EU imports from Mongolia and GSP+ utilisation rate, 2019-2024

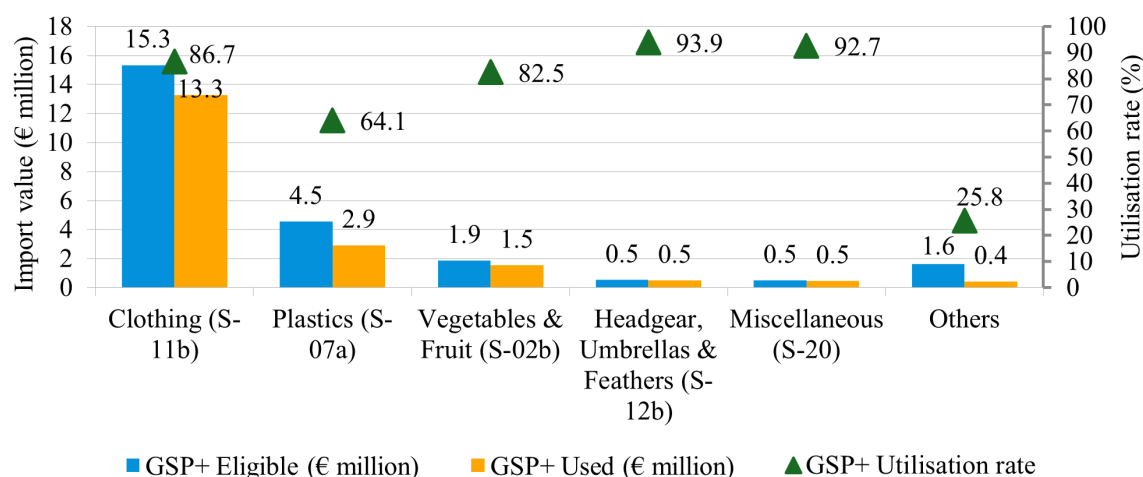
Indicators	2019	2020	2021	2022	2023	2024	Annual Growth (2022-2024)
Total imports, (EUR million)	74.7	50.3	69.9	141.8	134.7	128.0	-5.1 %
GSP+ eligible, (EUR million)	17.4	15.5	15.6	28.1	32.2	24.4	-6.7 %
GSP+ used, (EUR million)	14.1	14.1	13.0	24.2	21.5	19.1	-4.6 %
Share of GSP+ eligible in total	23.2 %	30.7 %	22.3 %	19.8 %	23.9 %	19.0 %	
GSP+ utilisation rate	81.0 %	91.0 %	83.3 %	86.2 %	66.6 %	78.4 %	
MFN=0 % imports, (EUR million)	53.5	34.4	51.1	107.1	100.2	101.7	-1.0 %
Share of MFN=0 % imports	71.6 %	68.5 %	73.1 %	75.5 %	74.4 %	79.4 %	

Figure 2. EU imports from Mongolia by trade regime and utilisation rates, 2019-2024



In 2024, the sectors⁸ benefiting most from GSP+ preferences (by EU import value) were clothing (S-11b), plastics (S-07a), vegetables & fruit (S-02b), headgear, umbrellas & feathers (S-12b) and miscellaneous manufactures (S-20). Apparel & clothing accounted for the largest share of total EU imports from Mongolia, with an 86.7 % GSP+ utilisation rate. Among the leading export sectors, headgear, umbrellas & feathers recorded the highest utilisation rate (93.9 %), though with only EUR 0.5 million in GSP+-eligible imports, while plastics registered the lowest rate at 64.1 % for a GSP+ eligibility value of EUR 4.5 million.

Figure 3. Top product groups benefiting from GSP+ tariff preferences for Mongolia, 2024



3. Compliance with GSP+ obligations

With exceptions concentrated in the environment and climate cluster, Mongolia is broadly compliant with its reporting obligations to the monitoring bodies (see Annex). This section is based on the latest UN monitoring body reports and supplemented with information from civil

society and GSP monitoring. The Country has also continuously engaged with the EU GSP+ monitoring process through regular exchanges of information.

3.1 Human Rights

During the reporting period, Mongolia has enacted a significant number of laws (most in 2024) although adjustments of existing laws and draft laws are still required to ensure alignment with international conventions.

The country's legal framework advanced with the adoption of the Law on Parliamentary Elections (2023), which introduced a mixed electoral system aimed at increasing **gender** representation. The Law on the Establishment of Courts (2024), which introduces a first instance court for family and children and is expected to also handle cases of gender-based violence entered into force in 2026⁹. However, training of judges to deal with these issues remains an important challenge.

As regards the **discrimination against women**, the Committee under the ‘Convention on the Elimination of All Forms of Discrimination Against Women’ (CEDAW) noted that Mongolia had taken comprehensive measures to implement the Law to combat Domestic Violence and had also established an integrated database system (eGBV) to record gender-based violence, and SMS-based reporting mechanisms. However, the Committee expressed concern that, despite extensive data being provided on case registration and prosecution, no detailed information on the types, duration and completion of sentences was made available¹⁰. Mongolia revised its **Child Protection** Law to further protect children from corporal punishment and amended related anti-trafficking legislation in 2024 to improve victim identification, protection, and interagency coordination¹¹. The State Party report to the Committee on the Rights of the Child under the ‘Convention on the Rights of the Child’ (CRC), due since September 2022, has yet to be submitted¹². During its dialogue with Mongolia in March 2025, the Human Rights Committee (International Covenant on Civil and Political Rights [ICCPR]) communicated its concern about child labour. The Government responded that it currently deploys 34 child labour inspectors and plans to deploy an additional 92 in 2026 to enforce the prohibition of child labour¹³.

Several concerns persist. While the abovementioned positive legislative and policy developments are an important step in the right direction, violence against women and children remains a significant issue, with low prosecution and conviction rates for rape, domestic violence, and trafficking cases. Outside the capital, the police are not trained to deal with gender-related crimes and there is a lack of social workers and paediatricians.

The absence of **comprehensive anti-discrimination** legislation¹⁴ has left marginalised groups, including persons with disabilities, LGBTIQ+ persons, and ethnic minorities, vulnerable to discrimination. Indigenous herder communities, disproportionately affected by extreme weather phenomena and extractive industry projects, continue to face challenges in accessing justice and protection¹⁵. The State Report to the Committee on the Elimination of Racial Discrimination under the International Convention on the Elimination of All Forms of Racial Discrimination (ICERD), due on 5 September 2022, has to date not been submitted. Key concerns expressed by the Committee in its last Concluding Observations remain unaddressed such as the adoption of comprehensive anti-discrimination legislation that considers all grounds of discrimination¹⁶.

Torture and ill-treatment in detention remain areas of concern, with low accountability for perpetrators¹⁷. The National Preventive Mechanism (NPM), established within the National

Human Rights Commission to monitor places of detention, lacks sufficient financial resources and multidisciplinary staff, thus hindering its effectiveness and geographic coverage¹⁸. The United Nations (UN) Subcommittee on Prevention of Torture (SPT) expressed concern that Mongolia has not yet amended the definition of torture in national law to include the prohibition of all forms of torture, nor has the Criminal Code been amended to ensure criminal liability for complicity or participation in torture, and adequate punishments¹⁹.

The Human Rights Committee issued Concluding Observations on 6 May 2025 expressing concerns on the insufficient application of the ICCPR by domestic courts, due to a lack of awareness among relevant actors in the justice sector and the general public²⁰. While the Committee welcomed the revised Law on the National Human Rights Commission (NHRC), it also considered that its Article 22.2 unduly restricts the Commission's authority to investigate individual complaints related to ongoing and concluded criminal and civil cases. The Committee also remains concerned about the ongoing absence of legislation and procedures to protect the rights of asylum-seekers and refugees and to prevent statelessness of children under 16 years of age²¹.

In the area of **freedom of expression**, Mongolia's Constitutional Court declared Article 13.14 of the Criminal Code - criminalising the 'dissemination of false information' - unconstitutional, following a case supported by journalists, lawyers, and civil society organisations. The ruling took immediate effect, suspending the provision, and was subsequently endorsed by the Parliament²², thereby completing its formal repeal. Media freedom experts assess the decision as a significant step forward for press freedom and freedom of expression, noting that the provision had increasingly been applied in recent years to constrain journalists and critics²³.

Priorities for future engagement include adopting comprehensive anti-discrimination legislation, monitoring the implementation of the Action Plan for Business and Human Rights, adjusting the Criminal Code concerning the definition of torture, and ensuring that the National Preventive Mechanism has the necessary resources to function effectively. To increase accountability for human rights violations, Mongolia should monitor the extent to which the conventions are applied by national courts and collect annual statistics on the number of prosecutions of and convictions for torture cases, trafficking in persons, gender-based violence and violence against children. The country should ensure that the draft new media law and the draft law on demonstrations and peaceful assembly are entirely aligned with freedom of expression requirements under the ICCPR.

3.2 Labour Rights

During the reporting period the Government of Mongolia has made advancements on several fronts, including the enactment of policies and the production of data and statistics on the application of fundamental labour rights. It also continues implementing its third Decent Work Country Programme 2023-2027 in cooperation with the International Labour Organization (ILO), one of its priorities being enforcement of international labour standards and effective social dialogue.

On the abolition of **forced labour** (ILO Convention concerning Forced or Compulsory Labour, No 29 (1930) and ILO Convention concerning the Abolition of Forced Labour, No 105 (1957)), the Law on Labour Migration adopted in 2021 contains new provisions to protect the rights of foreign/migrant workers, and an electronic platform has been launched to register entities that receive foreign workers and to improve oversight of compliance with the relevant legislation. Mongolia conducted a forced labour survey following ILO methodology, and was one of the first countries to implement a module on forced labour in the private economy in a national

labour force survey and the first country to include a section on conscript labour. The results estimated approximately 1.8 persons per 1000 to be engaged in forced labour, making it a rare phenomenon²⁴.

However, significant challenges remain. For the effective implementation of the Law on Migration, the ILO Committee of Experts on the Application of Conventions and Recommendations (CEACR) requested the Government to continue strengthening the capacities of law enforcement officials, including labour inspectors, prosecutors and judges, particularly by providing appropriate training²⁵. Regarding court cases related to Convention No 29 on Forced Labour, information was received on only one court case related to forced labour during the reporting period. Even though it is positive to see that the charges have been brought under the Criminal Code (and not the Administrative Code), the extremely low amount of court cases means that the legislation is not sufficiently enforced. In addition, Mongolia is yet to ratify Protocol 29.

As regards equal remuneration and **elimination of discrimination** (ILO Convention concerning Equal Remuneration of Men and Women Workers for Work of Equal Value, No 100 [1951] and Convention concerning Discrimination in Respect of Employment and Occupation, No 111 [1958])), the CEACR noted with regret that the Government does not provide information on any measures taken to address the underlying causes of the gender pay gap, including as a result of the National Wage Policy for 2019-2024 and its action plan²⁶. In its 2022 concluding observations, the CEDAW Committee expressed concern about the persistent gender pay gap in all sectors and the concentration of women in low-paid jobs in the formal and informal sectors²⁷. Under the ‘Discrimination (Employment and Occupation) (Convention No 111), the CEACR regretted the non-submission of information on specific sections of laws affecting discrimination, such as the reference to ‘appearance’ and ‘national extraction’ in the labour law, which raises concerns on how employees and applicants are protected against discrimination based on colour and national extraction in practice. The Government has so far not responded to these requests²⁸, raising questions on the effective implementation of the principle of non-discrimination in employment and occupation. Since the Law on the Promotion of Gender Equality of 2011 still allows for sex-specific job recruitment, the Committee reiterated its request to the Government to take steps to amend the relevant sections of the Law on the Promotion of Gender Equality to ensure that these exceptions are strictly limited to the inherent requirements of particular jobs and do not lead in practice to direct or indirect discrimination based on sex²⁹.

In relation to the minimum age for work and worst forms of **child labour** (ILO Convention concerning Minimum Age for Admission to Employment, No 138 [1973] and ILO Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, No 182 [1999]), the Government has positively conducted a new round of the child labour survey in 2021-2022, with the results published in 2024. The report found 16.3 % of children aged 5-17 years to be in child labour³⁰. CEACR noted with deep concern that, despite the measures approved by the Government, children under 18 years of age continue to be engaged in work which is clearly harmful to their health and safety. Children from the age of 8 years can still legally ride race horses from 1 May to 1 November, an activity that constitutes one of the worst forms of child labour. The UN Country Team in Mongolia expressed its concern over the Government’s proposed decision to abolish Order No. 57 of 2019, which prohibited horse racing including preparatory races between 1 November and 1 May. According to Department of Family, Children and youth Development, around 10,000 children per year participated in horse racing (data for 2017-2023). The Committee urged the Government to take measures as a matter of urgency³¹.

The matter of aligning the minimum age of admission to employment with the **age of completion of compulsory education** also remains pending, despite being one of the elements on which CEACR has long expressed concerns. According to the Law on Education, compulsory education is provided until the age of 16 years. The Committee asked to increase the minimum age for admission to work to match the age for compulsory education and ensure that adolescents are not tempted or forced to leave school early in order to start working³².

Regarding **freedom of association and the right to collective bargaining** (ILO Convention concerning Freedom of Association and Protection of the Right to Organise, No 87 [1948] and ILO Convention concerning the Application of the Principles of the Right to Organise and to Bargain Collectively, No 98 [1949]), Mongolia's Labour Law of 2021 covers all categories of workers and provides the basic principles of collective bargaining, extending its coverage to the informal economy. While a Law on the Rights of Trade Unions exists, a law on employers' organisations is not yet adopted, undermining the applicability of this right in practice. In addition, a few other aspects require further work. There is no evidence that the following issues have been successfully addressed during the reporting period 2023-2025: namely in relation to the conditions and procedures applicable to the formation of workers and employers' organisations, the right to strike, adequate protection against acts of anti-union discrimination, the role of public authorities in negotiations of industry level collective agreements, and the right to collective bargaining of public servants not engaged in the administration of the State.

Priorities for future engagement should focus on preventing children under 16 years of age from being engaged in hazardous work, in particular horse racing, and aligning the minimum age for employment with the completion of compulsory education. Strengthening the capacity of labour inspectors, in particular in the areas of forced labour and child labour, will also be crucial in ensuring the protection of workers' rights. Joining Alliance 8.7 could give an additional impetus to the fight against child labour. Lastly, ensuring the full implementation of the right to freedom of association is key, together with addressing the gender pay gap through gender-responsive labour policies, effective enforcement, and taking action against gender occupational segregation.

3.3 Environment and Climate

Mongolia remains party to all international conventions in this cluster, although reporting remains uneven and some submissions are delayed. The country has set climate objectives, including a long-term net-zero target, yet implementation capacity and continued dependence on coal limit the pace of emissions reductions.

Recent progress includes improved submission of annual and illegal trade reports under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), regular Article 7 reporting under the Montreal Protocol on Substances that Deplete the Ozone Layer, and preparatory steps toward phasing-down of hydrofluorocarbons (HFCs) following ratification of the Kigali Amendment^{33 34 35} on 27 July 2022. Climate transparency under the United Nations Framework Convention on Climate Change (UNFCCC) has strengthened through submission of the Fourth National Communication and Second Biennial Update Report in 2023, an updated Nationally Determined Contribution (NDC) under the Paris Agreement in September 2025, and the First Biennial Transparency Report in December 2025.

Progress in updating frameworks on biodiversity, chemicals, hazardous waste and biosafety has been gradual. Institutions led by the Ministry of Environment and Tourism remain active but face capacity and resource constraints, particularly in monitoring, enforcement and measurement, reporting and verification (MRV) systems. While improvements are visible in

areas such as municipal waste management and species conservation, challenges persist in hazardous waste control, persistent organic pollutants (POPs) inventories, biosafety oversight and biodiversity monitoring, limiting consistent assessment of implementation outcomes.

In the area of **biodiversity**, implementation under CITES remains mixed. Mongolia submitted annual and illegal trade reports up to 2024. However, the Standing Committee has continued to highlight concerns regarding legislative alignment and enforcement capacity, underscoring ongoing compliance challenges³⁶.

Implementation under the Convention on Biological Diversity (CBD) also remains uneven. Mongolia maintains an extensive protected area network and continues conservation efforts for snow leopard, saiga and argali. However, biodiversity monitoring systems and updated national indicators remain limited, constraining assessment of progress toward biodiversity targets^{37 38 39 40 41 42 43 44}.

As regards **biosafety**, the Country has not submitted a new national report under the Cartagena Protocol; its Fourth National Report has been overdue since 2019. The Biosafety Clearing-House shows only limited administrative updates without recent risk assessment records or regulatory decisions uploaded. Consequently, limited official information was available to assess implementation progress in this cycle. Mongolia has not posted new biosafety decisions or risk assessment outcomes since 2020⁴⁵.

On the protection against POPs, under the Stockholm Convention, the Fifth National Report was due in August 2022. Secretariat reporting tables for 2023 and 2024 list Mongolia among Parties with outstanding submissions, and no updated POPs inventory information has been recorded during the 2023–2025 monitoring period^{46 47}.

As far as **climate policy** is concerned, during the monitoring period, the United Nations Framework Convention on Climate Change (UNFCCC) Secretariat published updated synthesis analyses referencing Mongolia's mitigation pathway under its first updated NDC (2020)⁴⁸. The Country submitted its First Biennial Transparency Report on 31 December 2025, including updated greenhouse gas inventory information⁴⁹. The September 2025 NDC update maintains mitigation targets relative to a business-as-usual scenario rather than setting absolute emissions limits, which complicates assessment of mitigation progress⁵⁰. Although Mongolia has articulated a 2050 net-zero objective, UNFCCC analyses continue to highlight structural constraints in emissions accounting, MRV systems and institutional capacity^{51 52}. Mongolia has also been working since 2024 to adopt a dedicated Climate Change Law, establishing a national framework for mitigation, adaptation, greenhouse gas inventory management and institutional coordination^{53 54 55}. Independent assessments, including the UNFCCC technical analysis of the Fourth National Communication, the Organisation for Economic Co-operation and Development (OECD) Environmental Performance Review, the World Bank Country Climate and Development Report, United Nations Development Programme (UNDP) Climate Promise assessments and Asian Development Bank diagnostics, describe Mongolia's climate governance system as established but constrained by institutional capacity limitations.

With regard to **ozone-depleting substances**, Mongolia continues to rely on regulations under its National Programme for the Protection of the Ozone Layer, while ratification tables confirm that it ratified the Kigali Amendment in July 2022³⁵. The Kigali Implementation Plan anticipates the introduction of HFC licensing and control measures, although updated legislation had not yet been finalised by 2025. Implementation remains broadly compliant with Montreal Protocol control schedules.

Mongolia continues to rely on its 2017 amended Waste Law and the National **Waste Management** Improvement Strategy and Action Plan 2017–2030. While these frameworks address hazardous waste management, full alignment with the Basel Convention, particularly on prior informed consent procedures and shipment controls, remains incomplete^{56 57}.

Priorities for future engagement should include addressing remaining reporting gaps under chemicals and biosafety conventions, including submission of the Fifth National Report under the Stockholm Convention and outstanding reports under the Basel Convention. The country should continue strengthening legislative alignment, including updated CITES provisions, modernised hazardous waste regulation and revised biosafety and POPs frameworks. Further emphasis is needed on practical implementation in high-risk areas such as hazardous waste control, POPs management, biodiversity monitoring, illegal wildlife trade enforcement and climate mitigation and adaptation, to ensure measurable environmental outcomes under the Paris Agreement framework.

3.4 Good governance

Mongolia is compliant with its reporting obligations under two UN drug control Conventions (UN Single Convention on Narcotic Drugs 1961; UN Convention on Psychotropic Substances 1971), while it did not submit the information required under Article 12 of the United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances (Form D) for 2022 and 2023.

The country reacted to the rapid increase in illegal use of narcotic and psychotropic substances in recent years with proposals to amend and improve the Law on **Control of Narcotic Drugs and Psychotropic Substances** and related legislation. Until recently, Mongolia did not have a standalone national agency dedicated exclusively to illicit-drug control. In September 2025, the Government approved the Drug Enforcement Department’s transformation into an independent unit devoted to illicit-drug control, although the corresponding legal and operational framework is still being developed⁵⁸.

In the area of **anti-corruption**, the country completed the second review cycle under United Nations Convention against Corruption (UNCAC) in October 2023 with full report publicly available. The anti-corruption legislative framework was strengthened with the amended Public Procurement Law and Law on Political Parties. A new National Anti-Corruption Strategy for 2023-2030, adopted following protests over corruption in the mining sector, outlines a comprehensive approach to addressing corruption. However, challenges remain in implementing the strategy effectively, particularly in ensuring accountability and transparency in the mining sector. In 2024, Mongolia introduced a new institutional setup for anti-corruption policy, establishing high-level coordination and oversight under the Cabinet of Ministers, which now shares relevant functions with the Independent Authority Against Corruption (IAAC)⁵⁹. The IAAC is a specialised, multipurpose body that includes a dedicated unit for investigating corruption offences.

Although IAAC benefits from certain guarantees of independence, these safeguards are insufficient to fully protect its investigations from potential political interference, and its head remains a political appointee⁶⁰. Despite the existence of anti-corruption laws and dedicated agencies, enforcement remains inconsistent, according to the OECD⁶¹. Mongolia still lacks a legal and institutional framework for the protection of whistleblowers: a draft law on the legal status of whistleblowers was submitted to Parliament in 2021, but it remains pending⁶².

Priorities for future engagement should include ensuring compliance with reporting obligations (Article 12) under the United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances. Strengthening the capacity of anti-corruption agencies including the IAAC and enhancing the effectiveness of legal frameworks will be crucial in addressing current gaps in enforcement of anti-corruption laws and insufficient safeguards to fully protect investigations from potential political interference.

4. Cooperation

The EU has allocated EUR 48 million for Mongolia for the 2021-2027 period. Additionally, the country benefits from a variety of EU programmes and investments through the European Fund for Sustainable Development Plus (EFSD+), the main financial mechanism of the Global Gateway Strategy. Through the various instruments, the EU supports two main priority sectors in Mongolia: 1) green sustainable development (notably renewable energy, agriculture and forestry) and 2) democratic governance, including trade policy measures.

To accompany Mongolia's efforts to diversify its economy and exports and provide better employment opportunities in the non-mining sector, the EU is supporting the 'Trade for Decent Work Project in Mongolia - Phase 2' project (January 2024-December 2027).

By providing support to the Government and social partners in applying and reporting on ratified conventions to the ILO supervisory bodies, the project aims to promote decent work and sustain Mongolia's eligibility for the EU GSP+ arrangement. It also facilitates dialogue among tripartite partners to promote and ratify the remaining ILO Fundamental Convention, specifically the Promotional Framework for Occupational Safety and Health Convention 187 (2006).

Among its main achievements so far, the project contributed to the development of regulations crucial for the effective enforcement of the 2021 Mongolia's Labour Law. It also supported the National Human Rights Commission in conducting a Child Labour Qualitative Study, directly informing policy updates, including the revision to the list of prohibited jobs for minors and the formulation of light work conditions for children.

By working with UNDP, the EU also supports the implementation of the 2024 Action Plan for the Protection of Human Rights in Business Activities, Prevention of Human Rights Violations and Restoration of Violated Rights (2023-2027) which seeks to improve the situation of communities affected by mining operations⁶³. It should be noted however that the government itself does not actively promote the Action Plan.

Annex: Mongolia - Compliance with GSP ratification and reporting obligations

Convention	Ratification status / Reservations	Compliance with reporting obligations to monitoring bodies
Human Rights		
1. Convention on the Prevention and Punishment of the Crime of Genocide (1948)	Ratified: 05.01.1967 No reservations	No reporting obligations
2. International Convention on the Elimination of All Forms of Racial Discrimination (1965)	Ratified: 06.08.1969 No reservations	Non compliant with reporting obligations • Last Committee report: 28.08.2019 • Last report submitted: 02.10.2018 • Next report due: 05.09.2022 (not submitted)
3. International Covenant on Civil and Political Rights (1966)	Ratified: 18.11.1974 No reservations	Compliant with reporting obligations • Last Committee report: 06.05.2025 • Last report submitted: 15.05.2023 • Next report due: 31.03.2032
4. International Covenant on Economic Social and Cultural Rights (1966)	Ratified: 18.11.1974 No reservations	Compliant with reporting obligations • Last Committee report: 17.10.2022 • Last report submitted: 09.07.2021 • Next report due: 30.10.2027
5. Convention on the Elimination of All Forms of Discrimination Against Women (1979)	Ratified: 20.07.1981 No reservations	Compliant with reporting obligations • Last Committee report: 04.07.2022 • Last report submitted: 22.04.2020 • Next report due: 04.07.2026
6. Convention Against Torture and other Cruel, Inhuman or Degrading Treatment or Punishment (1984)	Ratified: 24.01.2002 No reservations	Compliant with reporting obligations • Last Committee report: 11.12.2024 • Last report submitted: 09.02.2021 • Next report due: 22.11.2028
7. Convention on the Rights of the Child (1989)	Ratified: 05.07.1990 No reservations	Non compliant with reporting obligations • Last Committee report: 31.05.2017 • Last report submitted: 03.06.2015 • Next report due: 01.09.2022 (not submitted)
Labour Rights ¹²		
8. Convention concerning Forced or Compulsory Labour, No 29 (1930)	Ratified: 15.03.2005	Compliant with reporting obligations • Last CEACR comments: 2023 • Last Government report submitted: 2025 • Next regular report due: not yet set.
9. Convention concerning Freedom of Association and Protection of the Right to Organise, No 87 (1948)	Ratified: 03.06.1969	Compliant with reporting obligations • Last CEACR comments: 2025 • Last Government report submitted: 2024 • Next regular report due: not yet set.
10. Convention concerning the Application of the Principles of the Right to Organise and	Ratified: 03.06.1969	Compliant with reporting obligations • Last CEACR comments: 2025 • Last Government report submitted: 2024 • Next regular report due: not yet set.

¹ Following a decision taken by the ILO Governing Body in November 2025 to modernise the ILO reporting system, as from 2027 Governments will no longer submit separate reports for each ratified Convention, but instead, they will submit thematic reports based on a new ILO template which has grouped the conventions and protocols into 15 thematic areas. As 2026 will be a transition year, only a limited number of reports will be requested in 2026. See: The future of reporting on ratified conventions. <https://www.ilo.org/international-labour-standards/applying-and-promoting-international-labour-standards-overview-ilo/future-reporting-ratified-conventions>.

² Reservations do not apply in the ILO system.

Convention	Ratification status / Reservations	Compliance with reporting obligations to monitoring bodies
to Bargain Collectively, No 98 (1949)		
11. Convention concerning Equal Remuneration of Men and Women Workers for Work of Equal Value, No 100 (1951)	Ratified: 03.06.1969	Compliant with reporting obligations • Last CEACR comments: 2023 • Last Government report submitted: 2023 • Next regular report due: not yet set.
12. Convention concerning the Abolition of Forced Labour, No 105 (1957)	Ratified: 15.03.2005	Compliant with reporting obligations • Last CEACR comments: 2023 • Last Government report submitted: 2025 • Next regular report due: not yet set.
13. Convention concerning Discrimination in Respect of Employment and Occupation, No 111 (1958)	Ratified: 13.06.1969	Compliant with reporting obligations • Last CEACR comments: 2023 • Last Government report submitted: 2023 • Next regular report due: not yet set
14. Convention concerning Minimum Age for Admission to Employment, No 138 (1973)	Ratified: 16.12.2002	Compliant with reporting obligations • Last CEACR comments: 2023 • Last Government report submitted: 2025 • Next regular report due: not yet set.
15. Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, No 182 (1999)	Ratified: 26.02.2001	Compliant with reporting obligations • Last CEACR comments: 2023 • Last Government report submitted: 2025 • Next regular report due: not yet set.
Environment and Climate		
16. Convention on International Trade in Endangered Species of Wild Fauna and Flora (1973)	Ratified: 05.05.1996 No reservations	Compliant with reporting obligations • Annual Trade Report for 2023 submitted on 30.10.2024 • Annual Trade Report for 2024 submitted on 30.10.2024 • Next Annual Trade Report due 31.10.2026 • Annual Illegal Trade Reports: Submitted for 2024³ • Last Implementation Report: Submitted for 2023-2024⁴.
17. Montreal Protocol on Substances that Deplete the Ozone Layer (1987)	Ratified: 07.03.1996 No reservations	Compliant with reporting obligations Last report submitted: • Article 7 data report covering 2024 submitted Next report due: • Article 7 data report covering 2025 due 30.09.2026
18. Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal (1989)	Ratified: 15.04.1997 No reservations	Non compliant with reporting obligations • National Report (NR) for 2023 and for 2024 outstanding • Next NR (2025) due 31.12.2026
19. Convention on Biological Diversity (1992)	Ratified: 30.09..1993 No reservations	Compliant with reporting obligations • Seventh National Report (7NR): submitted on 28.02.2026 • Latest National Biodiversity Strategy and Action Plan (NBSAP) update: 2015 (until 2025) • Next report due: 8NR due 30.06.2029

³ Reporting mandatory but not subject to compliance procedure.

⁴ Ibid.

Convention	Ratification status / Reservations	Compliance with reporting obligations to monitoring bodies
20. The United Nations Framework Convention on Climate Change (1992)	Ratified: 30.09.1993 No reservations	Compliant with reporting obligations • Last updated Nationally Determined Contributions (NDC): NDC 3.0 on 24.09.2025 • Latest National Communication (NC): NC4 submitted on 03.05.2024 • First Biennial Transparency Report (BTR1): submitted on 30.12.2025 • Next report (BTR2) due 31.12.2026
21. Cartagena Protocol on Biosafety (2000)	Ratified: 22.07.2003 No reservations	Compliant with reporting obligations • Latest National Report: 5NR submitted on 27.02.2026 • Next report: Not yet set
22. Stockholm Convention on persistent Organic Pollutants (2001)	Ratified: 30.04.2004 No reservations	Compliant with reporting obligations • Latest national report: 5NR submitted on 01.09.2022 • Next report due: 6NR due 31.08.2026 • Initial National Implementation Plan (NIP): 08.01.2008 • NIP updates: COP4 and COP5 amendments included
23. Kyoto Protocol to the United Nations Framework Convention on Climate Change (1998)	Ratified: 15.12.1999 No reservations	No reporting obligations separate from the United Nations Framework Convention on Climate Change
Good Governance		
24. United Nations Single Convention on Narcotic Drugs (1961)	Ratified: 06.05.1991 No reservations	Compliant with reporting obligations 2024 reporting fulfilled. Latest INCB (International Narcotics Control Board) mission in July 2018.
25. United Nations Convention on Psychotropic Substances (1971)	Ratified: 15.12.1999 No reservations	
26. United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances (1988)	Ratified: 25.06.2003 No reservations	Non compliant with reporting obligations Reporting on precursors required under Article 12 of the Convention (Form D) not fulfilled for years 2019-2020 and 2022-2024.
27. United Nations Convention against Corruption (2004)	Ratified: 11.01.2006 No reservations	Compliant with reporting obligations First review cycle completed in 2011; second review cycle completed in October 2023. Both the Executive Summary and full Country Review Report are publicly available.

¹ Key events in 2026 at the moment of writing have been included in this Staff Working Document. All links provided were up to date as of 28 April 2026.

² Blackwood, M. A., ‘Parliamentary Elections in Mongolia’, *CRS (Library of Congress)*, 2025. <https://www.congress.gov/crs-product/IN12390>.

³ OSCE Office for Democratic Institutions and Human Rights, ‘Mongolia 2024 parliamentary elections: ODIHR election observation mission’, OSCE, 2024. <https://odihr.osce.org/odihr/583408>

⁴ ADB, ‘Mongolia Country Partnership Strategy (2025-2028): inclusive and sustainable growth assessment’. ADB 2025. <https://www.adb.org/sites/default/files/linked-documents/cps-mon-2025-2028-isga.pdf>

⁵ World Bank, ‘Mongolia Economic Update: Building Resilience Amid Risk’, World Bank, May 2025. <https://openknowledge.worldbank.org/entities/publication/d7699e89-c95c-43ea-87c3-ea8661d706fa>

⁶ IMF, ‘Article IV: Mongolia Country Report No. 25/265’, IMF, Sept, 2025. <https://www.imf.org/en/publications/cr/issues/2025/09/15/mongolia-2025-article-iv-consultation-press-release-staff-report-and-statement-by-the-570413>

⁷ Source for all statistics in point 2.2: Eurostat data covering 2022-2024 based on latest available validated full year data as of September 2025. GSP statistics only cover goods imported into the EU market, i.e., goods released for free circulation in the EU. The GSP statistics do not cover other EU-imports, like goods imported for the customs inward processing procedure or re-imports after the customs outward processing procedure. Trade flows registered as ‘confidential’ do not appear in the GSP+ usage figures and regime 1 normal trade; but do appear in total trade figures (regime 4). https://ec.europa.eu/eurostat/cache/metadata/en/ext_go_agg_esms.htm#conf1537195068659

⁸ Products that benefit from GSP are separated in sections according to the GSP Regulation. Information on which CN codes are included in the GSP sections can be found in Annex V of the Regulation No 978/2012. [EUR-Lex – 02012R0978-20250101 – EN – EUR-Lex](https://eur-lex.europa.eu/lexuris/ui/02012R0978-20250101-EN-EUR-Lex).

⁹ Human Rights Committee, ‘Concluding observations on the seventh periodic report of Mongolia’, 6 May, 2025, p.1-2.

¹⁰ Committee on the Elimination of Discrimination against Women, ‘Follow-up Assessment Letter’, 4 Jul. 2025.

¹¹ US Department of Labour, Bureau of International Labour Affairs, ‘Mongolia 2024, Child Labour and Forced Labour report’, 2024. www.dol.gov/agencies/ilab/resources/reports/child-labor/mongolia; Ministry of Family, Labour and Social Protection, Draft Regulation for Intersectoral Team Supporting Child Victims of Human Trafficking, 11 Sep. 2024. www.mlsp.gov.mn/en/content/detail/1810.

¹² US Department of Labour, Bureau of International Labour Affairs, ‘Mongolia 2024, Child Labour and Forced Labour report’, 2024. www.dol.gov/agencies/ilab/resources/reports/child-labor/mongolia

¹³ OHCHR, ‘In Dialogue with Mongolia, Experts of the Human Rights Committee Commend Quotas for Women Parliamentarians, Raise Issues Concerning Corruption and Press Freedom’, 11 Mar. 2023. www.ohchr.org/en/meeting-summaries/2025/03/dialogue-mongolia-experts-human-rights-committee-commend-quotas-women

¹⁴ OHCHR, Working Group on the Universal Periodic Review, ‘Mongolia, Compilation of Information prepared by the OHCHR’, 18 Aug. 2025, p.2

¹⁵ Government of Mongolia/UNDP, ‘Socio-economic impact assessment of Dzud 2023-2024: Dzud resilience strategy policy recommendations’, Sep. 2024, p. 10.

¹⁶ Ibid.

¹⁷ Committee against Torture, ‘Concluding observations on the third periodic report of Mongolia’, 11 Dec. 2024, p. 5-6.

¹⁸ Human Rights Committee, ‘Concluding observations on the seventh periodic report of Mongolia’, 6 May 2025, para. 26.

¹⁹ Committee against Torture, ‘Concluding observations on the third periodic report of Mongolia’, 11 Dec. 2024, p. 3.

²⁰ Human Rights Committee, ‘Concluding observations on the seventh periodic report of Mongolia’, 6 May 2025, p. 2.

²¹ Ibid, para. 32.

²² The Parliament endorsed the Constitutional Court ruling on 30 Dec. 2025.

²³ International IDEA, ‘Constitutional Court strikes down controversial provision criminalizing “false information”’, International IDEA, Global State of Democracy Initiative, 2025. www.idea.int/democracytracker/report/mongolia/november-2025.

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- ²⁷ CEDAW/C/MNG/CO/10, 12 July 2022, paragraph 30, mentioned in ILO, Observation (CEACR) on Convention No. 100, adopted 2023, published in 2024. https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID,P13100_COUNT_RY_ID:4366232,103142:NO
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- ³⁰ ILO / National Statistics Office of Mongolia, 'Child Labour in Mongolia - Child labour survey results 2021-2022'. <https://www.ilo.org/publications/child-labour-mongolia-child-labour-survey-results-2021-2022>
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