



PROJECT COMPLETION REPORT

ANTI-CORRUPTION AND TRANSPARENCY INITIATIVE

REGULATION OF CONFLICT OF INTEREST

IN

MONGOLIA



ULAANBAATAR
September 21, 2007

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BASIC DATA

Project Title: Regulation of Conflict of Interest in Mongolia

Estimated Project Period: November 2006-August 2007

Estimated Total Budget: **\$21,396**

Total Cost: \$21,934.26

Amount Requested: \$16,449

(Exchange Rate: \$1: \$1.00 = MNT 1,170)

Proponent Name and Address:

Women for Social Progress

Main Office: National History Museum, North Entrance, Room 2-3

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Date Founded: January, 1997

Date Registered: July 7, 1997 (date of registration under new law)

Type of Registration: NGO – Registration # 1009958

EXECUTIVE SUMMARY

The “Regulation of Conflict of Interest in Mongolia” is a project implemented by the Women for Social Progress funded by the ADB-PTF partnership program through a \$16,449 grant. The project is implemented in coordination with the Anticorruption Agency, relevant CSOs and legal professionals. The project’s ultimate goal is to develop a transparent definition and understanding of conflict of interest, build knowledge of COI among law and decisions makers, increased public awareness and prepare soil for future legislation as prevention of corruption.

The review of existing legislation and regulatory framework for provisions aimed at preventing conflict of interest carried out as the primary stage of project activity produced expected results in informing and better adapting the Toolkit as guidance for law drafting, to inform procedures and regulations and/or law on conflict of interests. The 365 items of legislation and regulations relevant to anticorruption and conflict of interest such as codes of ethics of public servants, laws on public service, government procurement, package of tax laws, minerals and environmental protection were reviewed in this process along with feeding information into the COI Toolkit have produced other results, which has had unplanned impact on the project activity.

The process of research of legislation stumbled onto a practice of “final editing” of legal acts after approval by parliament and ratification of such “edited” legislation without parliament hearing. WSP applied to the Constitutional Court for their opinion on constitutionality of above actions, which resulted in a lengthy legal process demanding time and resources of the organization. This deviation from original project activity is addressed in detail in this report as it has a) significantly delayed project schedule but b) produced significant social and political outcomes capable of enhancing overall project impact.

As appealed by R. Burmaa and D. Lamjav and confirmed by the Constitutional Court, the “final edits” introduced by the Speaker has in fact altered content, intent, and principles of laws passed by parliament and as such represents “an act of encroachment upon lawful authorities of SGH (Parliament)”. While the Speaker was allowed to resign on “his own accord” instead of recall by his political party or resignation by a decision of SGH, this is the first case in political history which sets precedent for: 1) victory of civic action against top tier public authority; 2) Constitutional Court making independent determination against MPRP (former communist party) practices; 3) resignation of top tier authority for abuse of power; 4) open and transparent nationwide discussion of acts of top tier authority.

One other seemingly unrelated issue is the refusal of the Election Commission to establish mechanisms for including Mongolians living and working outside Mongolia (around 200,000 citizens) to vote in 2008 parliamentary elections. The CC has not initiated a constitutional debate over this issue which will obviously result in delivering a

determination that request of the Election Commission to eliminate this clause from the new law violates constitutional rights of citizens to vote. This petition has been supported by a formal letter to the relevant authorities from Forum Asia. This is an evidence of public discussion on conflict of interest and abuse of power broadening to include citizens residing outside Mongolia (Annex 8).

Print and electronic media reported on the case nationwide from the Constitutional Court Room from October 2006 though May 2007 - highest ever visibility to a case of abuse of power by high level public authority. The case was a must see and hear latest news for over six months that it is finding its way to public life in various forms. The Democratic Party, for example used it in its next election campaign slogan: “Will implement - not edit or surpass law”. This high visibility of the case developed perfect soil for effective public discussion, awareness and training programs aimed at educating the public on issues such abuse of power, corruption and conflict of interest, which are still ambiguous concepts in our society.

Through production of a Conflict of Interest Toolkit based on the OECD Toolkit, which incorporates current legal and regulatory framework of the country and Mongolia specific cases and topics, the project aims to inform the public, law and decision makers of best practices in conflict of interest management, regulation and legislation.

The “Managing Conflict of Interest: A Toolkit” (OECD) was translated and adapted into a toolkit with legal framework and case information relevant for use in Mongolia. Discussions among legal experts informed the choice of Mongolia related information, conflict of interest terminology and relevant case materials.

The project now has the ear of CSOs, public and private organizations on issues related to abuse of power, roles and responsibilities of public officials, which opened up greater opportunity for expanding its networking and cooperation. The Anticorruption Agency is emerging as key partner in dissemination, training and use of COI Toolkit, leaflets and other awareness materials.

In one of TV round tables on corruption and conflict of interest, MP Z. Enkbold publicly committed to submit to Parliament, if WSP produces a draft law on COI. R. Burmaa has expressed interest in cooperating with any interested party on developing and drafting a law on COI. This public commitment lays ground for our future work in conflict of interest area.

I. PROJECT DESCRIPTION

Corruption in Mongolia as concluded by the latest USAID Assessment of Corruption in Mongolia is rampant and enabled by the following weaknesses in the public administration system:

- A profound blurring of the lines between the public and private sector brought about by endemic and systemic conflict of interest (COI) at nearly all levels;
- A lack of transparency and access to information that surrounds many government functions and undermines nearly all aspects of accountability by contributing to an ineffective media and hindering citizen participation in policy discussions and government oversight;
- An inadequate civil service system that gives rise to a highly politicized public administration and the existence of a “spoils system”;
- Limited political will and leadership to actually implement required reforms in accordance with the law, complicated by conflictive and overlapping laws that further inhibit effective policy implementation; and
- Weak government control institutions, including the Central Bank, National Audit Office, and Parliamentary standing committees, Prosecutor General, State Professional Inspection Agency, State Property Committee, and departments within the Ministry of Finance.

Mongolia has joined a UN Convention of Anticorruption and enacted a new Anticorruption Law, which includes creation of new Anticorruption Agency and implementation of various donor funded anti-corruption programmes. The area of concentration of our project is conflict of interest, which as concluded by the above assessment is “endemic and systemic” and covers all levels of public service.

While new and existing legislation have improved, they still lack clarity and practical implementation and management guidance as well as lack of political will to enforce law. Years of anticorruption and public administration reform activities have been implemented with little success due to lack of political will on part of ruling political forces.

Half of cabinet ministers appointed by the Parliament after 2004 parliamentary elections are businessmen, who hold key business positions and interests in the sectors which they lead (energy, construction, tourism and transportation, etc.) Media reports on a daily basis on major cases of conflict of interest decisions made by these ministers, which violate laws of regulating all spheres of public administration, including key areas such as procurement of goods and services, tender rules, release from and appointment to public office, delegation of decision-making authority.

Due to rising public dissatisfaction with these cases and calls to bring to justice certain members of top tier public officials, the ruling majority of MPRP recently revised its party charter to introduce a clause, which protects its political appointees by declaring that the Charter will rule the decision on violation of ethical standards of its members. As

interpreted by legal profession this clause puts the MPRP Charter, which was accepted by the Supreme Court, beyond law and Constitution.

Under the circumstances, it seemed important to raise public awareness, enhance public and CSO involvement in pressuring government to enact new COI law if found necessary, improve and implement existing legislation. The Project's aim was to review existing legal acts, prepare and introduce a toolkit consisting of existing legal provisions and guidance on international regulatory standards and COI management practices first to law and decision makers.

Along with informing decision makers the Project aim is also inform and educate the public about conflict of interest, international standards and practices of managing Conflict of Interests, increase public awareness and discussion on COI. The Project components include public awareness campaigns and training in COI in cooperation with public and CSO organizations.

The key instrument for education and discussion on conflict of interest is the COI Toolkit based on the OECD "Managing Conflict of Interest: A Toolkit", selected for its relevance to Mongolia's condition and its successful application in former socialist countries of Eastern Europe. The Project activity consisted of the following four components:

1. Research legal framework for COI provisions, develop Mongolia section for COI Toolkit.
 - 1.1 Research on legal provisions regulating conflict of interest in existing legislation;
 - 1.2 Research on provisions in political party charters and codes of ethics.
2. Research on COI cases.
 - 2.1 Research on publicized cases of conflict of interest in print media;
 - 2.2 Development of a list of widespread COI forms and cases.
3. Develop and distribute a handbook or toolkit on COI, including all COI regulations and laws and related international documents, standards on COI, glossaries, and so forth
 - 3.1 Translation of the OECD Managing Conflict of Interest: A Toolkit" ;
 - 3.2 Discussion and development of terminology for use in the Mongolian adaptation;
 - 3.3 Compilation of the Mongolia section of the COI Toolkit
 - 3.4 Design, printing and dissemination of the COI Toolkit.
4. Public awareness interventions.
 - 4.1 Press conference, round-tables and TV discussions,
 - 4.2 Radio, TV and print media campaigns,
 - 4.3 Dissemination of posters and leaflets to trigger public watchdog interest and initiatives.

II. PROJECT FRAMEWORK & IMPLEMENTATION

A. Relevance of Project Framework

The design of the Project, which consists of four components: a) research of relevant legal framework; b) research of COI cases in Mongolia and development of Mongolia section for COI Toolkit; c) compilation and dissemination of a COI Toolkit and d) public awareness and discussion activities are adequately formulated to achieve the goals of the Project.

Consistent with the project criteria of the Partnership for Transparency Fund, the WSP Project has directly contributed to increased public awareness, discussion and CSO action against conflict of interest and corruption.

While the initial project framework was aimed to raise public awareness through media campaigns and discussions with public officials based on research products and COI Toolkit, the unexpected outcome of its legal research, which entailed a constitutional debate – created a unique framework bringing a) immediate, b) high visibility and c) nationwide discussion of COI and corruption.

B. Project Outputs

Assessment of the project implementation and its results is based on targeted outputs of identified activities at project development stage, mid-term assessment, and final report with final Project Financial Report (Annex 1).

1. Research of Legal Framework

1.1. Reviewed 345 legal acts including such regulatory documents as ethics codes, political party charters for provisions aimed managing COI

1.2 Analyzed findings for adequacy, efficiency and coherence

The WSP Project Team researched existing laws such as the Anticorruption Law, Corporate Tax Law, VAT Law, Mining Law, Election Law, Public Administration and Financial Management Law; political party charters, public and private sector ethics codes were available for provisions regulating conflict of interest. The purpose of this research was to gather, consolidate, review and analyze provisions regulating COI in public administration.

The research activity itself follows a building-block process of coming up with a) package of information for inclusion in the COI Toolkit and b) evaluation of existing legal provisions for recommendation to amend existing or develop new legislation.

The research activity produced the package of COI related provisions of laws, disclosure and other forms necessary for inclusion in a toolkit for use by public officials and/or any reader seeking to learn about COI management. Based on the outcome of analysis of

legal provisions decision was made to translate and adapt the OECD “Managing Conflict of Interest: A Toolkit” to articulate recommendation to draft new and better legal framework for managing COI and prevention on corruption. The Anticorruption Law drafted with the assistance of donors has been unconstitutionally edited and requires either annulment or amendment to adequately combat corruption. Two key findings of the Project lie in the fact that by editing a) one single word the Speaker turned the Anticorruption Agency from an independent agency to one reportable to parliament and b) took out top tier public officials from the subjects governed by this law, making the law applicable to mid-low level public officials.

The unexpected output of Project research – constitutional debates and action against unconstitutional editing of key laws regulating economic, financial and business sectors - has taken a life of its own. Businesses, CSOs and professional NGOs operating in these areas have taken over discussions and actions aimed at eliminating consequences of current and preventing future acts of abuse of power and corruption (Annex 7- Determination of Constitutional Court).

2. The COI Toolkit

The COI Toolkit produced by the project is based on the translated version of the OECD “Managing Conflict of Interest: A Toolkit”, (“Gereer les conflits d’interests dans le secteur public: Mode d’Emploi. OECD 2005”). The Project Team preferred to commission translation of this manual to preserve its practical content and format for use as training and guidance manual in both managing COI and developing new legislation (Annex 2 –P-2007-199).

Our Conflict of Interest Toolkit consists of sections of the Managing Conflict of Interest: A Toolkit” and relevant provisions of international treaties and Mongolian laws (Annex 3).

TABLE OF CONTENT:

“Conflict of Interest” – definition
Objective tests for identifying a conflict of interest
Checklist for identifying “at risk” areas for conflict of interest
Ethics code provisions relevant to conflict of interest
Conflict of interest self-test
Conflict of interest: generic law
Gifts and gratuities checklist
Gifts for officials: generic law
Registration of interests and assets: generic law
Registration of personal interests and assets: procedure
Integrity testing policy
Public interests disclosure policy and procedure (“Whistleblower” protection)
Training cases
OECD Guidelines on managing COI



ANNEX 1

Disclosure of Asset and Income Statement

1. SGH Resolution #9 on “Approval of Disclosure of Asset and Income Statement, Registration and Records”
2. Asset and Income Disclosure Form for public official
3. Regulation on registering and keeping disclosure forms submitted by public officials
4. Guidance for completing and submitting Asset and Income Disclosure Form
5. Sample Disclosure Form

ANNEX 2

Provisions Relevant to Conflict of Interest: international treaties, laws and regulations:

1. Extracts from International Treaties and Conventions
2. Extracts from Mongolian Laws
3. Extracts from Resolutions of SGH, Presidential Decrees
4. Extracts from other legislation and regulations

List of Reference Materials

As total of 500 copies of the COI Toolkit were printed and disseminated to all 76 members of parliament, Anticorruption Agency, ministries and public administration agencies, CSOs, media, public libraries and academia.

The Anticorruption Agency has obtained additional copies of the COI Toolkit for distribution to their staff in rural areas as well as invited WSP to participate in the training events scheduled for the Anticorruption Day in December.

It is also becoming a sought after textbook among students of public administration and law faculties.

The COI Toolkit contains existing legal framework and will be used to demonstrate inadequacy of these provisions to combat and prevent corruption and in articulating need for improvement or new legal framework.

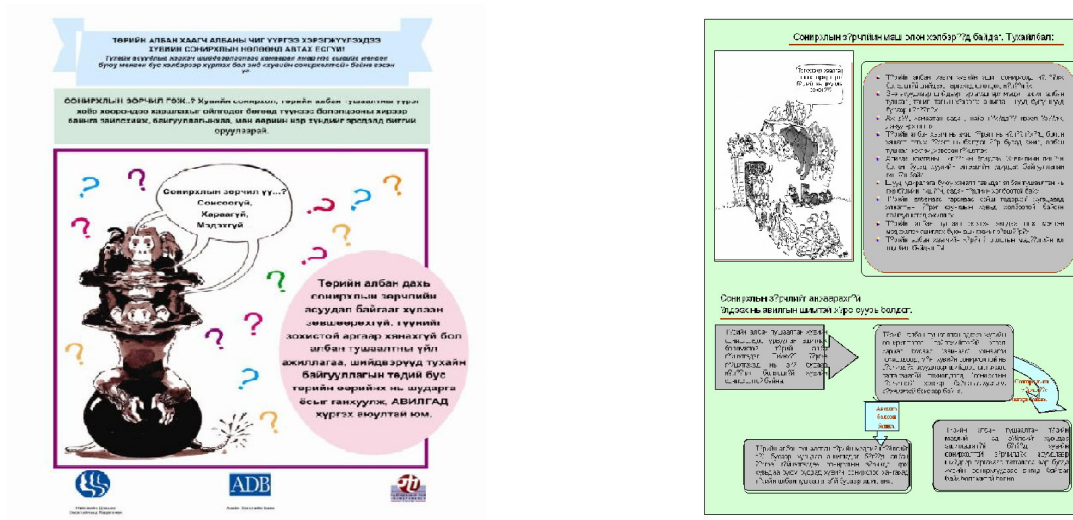
3. Case Studies

This research work reveal abundance of cases publicized in media. Selection, comparison and categorizing of cases revealed the fact 99 percent of cases were already covered in the OECD Toolkit. Mongolia specific cases include “final editing” of laws to meet the interests of the ruling caucus in parliament and “open and transparent” violation of law

and abuse of power by top tier public officials in making procurement tender and appointment decisions.

4. Public Awareness Campaign

500 copies of the COI Toolkit, 5000 leaflets and 3000 posters, several TV and FM radio messages on COI produced and disseminated along with press conference, round-table and TV discussions around COI and abuse of power issues (Annex 4 and 5).



A round-table discussion was organized in September 2007 in cooperation with the Anticorruption Agency, which brought together several CSOs (Tseh, TI Mongolia, Globe International, Citizens Alliance, Soyombo Movement, etc.) working in anticorruption area. The discussion concluded that extensive training and public awareness is needed in order to engage greater public involvement in the fight against corruption.

The TV round table discussion along with providing information on conflict of interest, international standards and mechanisms provided opportunity for TV viewers to hear opinions of participating MPs, CSO/NGO leaders on this topic. Due to current status government crisis these was heightened attention to the round-table meeting evidenced by call-in feedback of TV viewers (Annex 6 – TV forum).

The unexpected output of the Project triggered interviews with project team members R. Burmaa and D. Lamjav (printed and aired) and discussions around abuse of power, COI of high level public officials, which continue from 11/06 to date. The topic of interviews is gradually refocusing from the actual fact of “unconstitutional editing” to pressure government to annul unconstitutionally edited laws, their consequence and hold accountable officials responsible.

Project has negotiated with other projects in the legal reform area to disseminate its public awareness materials through their public awareness programmes.

5. Administration, Supervision, Monitoring and Evaluation

In general the Project has been able to provide timely monitoring and supervision throughout the whole project period implementation. Due to the unexpected turn in the legal research stage of project and following constitutional debate delays were caused in initiating following components of the Project. Extension was requested and obtained no-cost extension approval from PTF/ADB to complete its objectives by October 30, 2007.

Despite the new development in the Project and resulting high demand on the time and financial resources of WSP the Project has been able to get back on track and complete its objectives. It has in fact achieved over and above of what has been planned under the project.

D. Lamjav, B. Chimid and D. Sukhgerel have provided active participation and technical advisory support to the project implementation.

C. Project Timetable

As discussed in the above section the Project schedule of activities needed modification as shown in this Table, marked with X for actual implementation timeline, while blue shading reflects planned timelines.

		2006 11	12	2007 1	2	3	4	5	6	7	8	9	10
1	Developing and copying the toolkit							X	X	X	X		
2	Case study for toolkit												
3	Consultancy with national experts								X	X	X		
4	Discussion										X	X	X
5	Press conference											X	X
6	Produce TV and radio program											X	X
7	Place the toolkit introduction in newspaper										X	X	X
8	Publish leaflets and poster										X	X	X
9	Advocacy activities						X	X	X	X	X	X	X

D. Project Expenditures

The project estimated cost is \$21,396 with \$5,405 as WSP equity and \$16,449 in PTF grant during project development stage. The first tranche of funding \$7,393 was received in December 2006. The second tranche was requested with a fair delay and received in November 2007. A final tranche of \$1,649 remains to be received after submission of the final project completion report (Annex 1 – Financial Report).

Total WSP expenditure of the project is MNT19,339,240, which reflects a slight MNT 90,000 higher than expected cost of project translation line item.

III. PROJECT IMPACT

While the Project did not carry out a formal assessment of its impact there has been apparent and readily measurable impact in terms of much higher public attention to issues and government decisions in sectors governed by the “unconstitutionally edited” laws, mining sector decisions and environmental issues, tax, government procurement and abuse of power by public officials in delivering decisions in these areas. The revelation of fact that relations in many areas of government activity are being regulated by “unconstitutionally edited” laws had an effect of a snowball rolling downhill, gaining more public support and revealing more issues and problems, diminished already fading public trust in the government.

The Project not only created a nationwide popularity for the Chair of Women for Social Progress through its chair Ms. R. Burmaa but enhanced the role and respect for CSOs and civil society activists and their action on the whole. Common effort of CSOs and their victory in forcing government to postpone signing of a major stability agreement empowered not only these but all other CSOs to step up their activities against corruption and unlawful decisions of public officials.

The Constitutional Court debate and the information carried in the COI Toolkit served as impetus and module for taking up conflict of interest and corruption issues for CSOs (CSOs active in mining, tax and financial sector, election, corporate development) as well as politicians interested as evidenced by increased number of media reports, petitions and civic action against corrupt decisions of the government.

With the above interest to topics related unlawful actions of the government, the COI Toolkit and public awareness materials are enjoying greater attention and apprehension by the public.

Public feedback is overwhelmingly loud in terms of demanding government to revise unlawfully edited legislation. Media is highlights higher visibility coverage to conflict of interest, abuse of power and corruption cases involving high level public officials. The demand for “clean” politicians and “clean” political forces has become acutely apparent.

The Democratic Party sensitized by this public feedback used the unconstitutional editing of laws in its 2008 election campaign slogan “Will implement - not edit or surpass law”. There is expressed interest on part of politicians and future election campaign candidates to use the case and “partner” with R. Burmaa and D. Lamjav to build their political image. If this interest of political parties and election candidates is successfully geared toward inclusion of conflict of interest in their campaign promises the overall impact will reach far beyond the Project expectations

IV.OVERALL ASSESSMENT AND RECOMMENDATIONS

A. Overall Assessment

The project has achieved its objectives as defined during the development period and may be considered successfully completed. The project has clearly articulated and achieved its goal of quantitatively and qualitatively increasing public and CSO awareness of and knowledge about conflict of interest and lack of adequate and effective legal framework for reducing and preventing corruption.

Raising awareness of the general public and CSOs to the need for them to monitor legislative as well as executive government performance is one of key achievements of the project. Closer monitoring by civil society and general public as well as the fact that the culture of paying lip-service to openness, transparency and good governance by ruling political parties has been revealed and will hopefully entail change in code of conduct of future governments.

B. Problems Encountered

The key problem encountered during the first research phase of project in the first two month of project implementation caused delays in initiating other components simultaneously. The Project team and its leadership had to devote time and resources to researching discrepancies in law provisions they stumbled onto in the process of researching provisions regulating conflict of interest and corruption. The team had to bring in more lawyers and experts to research key legislation regulating sector and areas of economic and business activity, which are closely linked to corruption.

Furthermore, Project Financial Accountant taking maternity leave led additional difficulties in not being able to report on project progress and obtain next tranche of financing. The project continues to suffer from shortage of funding due to no-cost extension and delayed submission of progress reporting to allow disbursement of next tranche funding by PTF.

From June 1st through October 30 the WSP encountered major shortage of funding problem due to unexpected additional activities, which the project decided to carry out as a separate activity funded out of WSP's own funds. While the decision was politically correct, lack of experience with constitutional debates lead to making a decision to fund an activity which is becoming a long term commitment for the organization and its resources.

C. Lessons Learned

The project has made a politically sound decision to appeal and engage in a constitutional debate over abuse of power and violation of Constitution issues. Without this constitutional debate the discussion and public awareness campaign would have drowned or become one of usual drops of useful information in the abundance of daily information.

The decision to carry out this activity separate from the PTF/ADB funded Regulation of Conflict of Interest in Mongolia project was a time and effort saving decision, which allowed WSP not lose momentum of internal political crisis within the MPRP. WSP made appropriate assumption of not involving ADB in supporting a constitutional debate however failed to make appropriate assumptions and calculation of its human and financial resources to allow smooth completion of PTF/ADB and other projects implemented by WSP, along with the new constitutionality project.

While negative impact caused by the unexpected turn in the project activity and leave taken by key financial manager have been remedied, they indicate at the need for better contingency planning in the future. WSP needs to review existing projects and possibly seek to hire more staff or enter into partnerships with other CSOs to allow greater impact and performance if its projects.

D. Recommendations

1. Drafting Conflict of Interest Law

It is important to not to lose momentum gained through this current project and continue negotiations already initiated with the Anticorruption Agency on cooperation in drafting a conflict of interest law or amendments to the existing legislation.

It is necessary to reverse unconstitutional changes made to the Anticorruption Law as well as introduce international standards and practices of conflict of interest management, establish an adequate and effective disclosure process, etc.

While it is not in the interest of the Project to react to public demand to establish whose interests were pursued in these unconstitutional changes in key pieces of legislation, it may be used to initiate discussion and improve COI disclosure process. Establishment of the reason behind these changes will also allow clarify existence of corruption.

2. Pursue precedent cases with the Constitutional Court

The new Election Law, as found by Project Team, has been edited to bring in clauses with dual meaning, which may be interpreted to the benefit of the ruling party depending on the situation. Provisions of the law related to the Election Management Body (EMB), election procedures and electoral districts have all been formulated to allow ease of running for the two major political parties, creating horde of obstacles for small parties and independent candidates. Should all obstacles fail to work the law authorizes the EMB to cancel election results based on a simple EMB conclusion that election procedure has not been followed to the letter. Violation of election procedure is easy to “prove” with procedures containing dual meaning or opportunity to any number o interpretations. This law is considered a product of conflict of interest as the working group members and the “final edits” have been made by MPs representing MPRP in SGH, “in consultation” with its key rival and current coalition partner –Democratic Party.

Taking up this case with the Constitutional Court will give it the necessary high public visibility as well as public support in ensuring equal rights and opportunity for all to vote and get elected, provided for in the Constitution of Mongolia.

3. Conflict of Interest Training

Lack of technical capacity at the Anticorruption Agency is evident from its training and education activities targeted on educating academia, university and high school students in corruption and corruption prevention. The current “edited” law makes mid-level public officials, health, education and legal sector professional its key subjects. This provides opportunity for public administration officials and top tier political appointees to “escape” corruption prevention training and continue “business as usual”.

4. Use of COI Toolkit

Use of COI Toolkit in informing law drafting process as well as discussion around existing international standards and best practices to introduce Ombudsman or similar mechanisms to act as trusted foundations of the citizenry in the fight against corruption.

The above activities will maintain the momentum gained from the project in the past months and serve as basis for continued sustainable anticorruption activities.

It is recommended that WSP approach and discuss with PTF/ADB opportunity for funding support for a next phase of project to build on its current achievements to tangibly improve legal environment for combating and preventing corruption in Mongolia. These activities could include drafting of a law on conflict of interest and further expansion of targeted training and public awareness activities.