Mongolia: Additional Financing of Third Sustainable Livelihood Project

Prepared by: Third Sustainable Livelihood Project Unit

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<table>
<thead>
<tr>
<th>Abbreviation</th>
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<td>APL</td>
<td>Adaptable Program Loan</td>
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<td>APA</td>
<td>Annual Performance Assessment</td>
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<td>ALST</td>
<td>Aimag Level Support Team</td>
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<td>AF</td>
<td>Additional Financing</td>
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<td>SLP III</td>
<td>Third Sustainable Livelihood Project</td>
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<td>GRM</td>
<td>Grievance Redress Mechanism</td>
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<tr>
<td>M&amp;E</td>
<td>Monitoring and Evaluation</td>
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<td>LPO</td>
<td>Local Project Officer</td>
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<td>MIS</td>
<td>Management Information System</td>
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<td>IBL</td>
<td>Integrated Budget Law</td>
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<td>IPP</td>
<td>Indigenous Peoples Plan</td>
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<td>LDF</td>
<td>Local Development Fund</td>
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<td>ESMP</td>
<td>Environmental Social Management Plan</td>
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<td>NGO</td>
<td>Non-governmental organization</td>
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<td>TOR</td>
<td>Terms of References</td>
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<td>MoF</td>
<td>Ministry of Finance</td>
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<td>TA</td>
<td>Technical Assistance</td>
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<td>FM</td>
<td>Financial Management</td>
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<td>EIA</td>
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Section A. Project description

SLP-III is the third stage of the National Sustainable Livelihood Support Program (2002-2016). The Sustainable Livelihoods Program was envisaged as a three-phase Adaptable Program Loan (APL), and approved by the Government of Mongolia and the Board of the World Bank with this understanding. The objectives, basic features and duration of each phase of the APL for the SLP were set at the start of the program, and not been revised.

| Table 1: Overview of SLP three-phase APL (2002-2022) |
|-----------------|---------------------------------|-----------------|
| Phase           | Objective                                      | Basic feature               |
| SLP1 2002 - 2007 | An effective approach to promoting improved, secure and sustainable livelihood strategies developed, demonstrated, and validated in selected areas, and institutional capacity created so that these strategies can be replicated and scaled-up in phase II of the program. | Identify and pilot processes and institutional mechanisms |
| SLP2 2007 - 2012 | To enhance livelihood security and sustainability by scaling up institutional mechanisms that reduce the vulnerability of rural communities throughout Mongolia. | Scale-up institutional mechanisms at national, aimag and soum levels. |
| SLP3 2015 - 2020 | To fully institutionalize appropriate mechanisms utilized in phase I and II to reduce the vulnerability of rural communities throughout Mongolia. | Fine-tune technical and institutional innovations for long-term sustainability |
| SLP3 AF 2020-2022 | The proposed Project activities would represent a continuation of current activities. | The proposed AF would scale up project activities under Component 1 and 2. |

In 2002, the World Bank Board approved the first phase of a three-phase Adaptable Program Loan (APL) focusing on three major interventions: pastoral risk management, micro-finance outreach to deepen access to finance, including for livestock insurance, and community driven infrastructure and basic services development. This project is the third and final phase of this initiative.

Project Development Objective

The Project Development Objective of Third Sustainable Livelihoods Project (SLP3) is to improve governance and community participation for the planning and delivery of priority investments in rural areas of Mongolia.

Project Components

Component 1: Capacity Building for Local Governance and Livelihoods

The objective of this component would be to build the capacity at local and national levels for the implementation and further development of the Government’s programs and mechanisms for supporting rural development.

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1Aimag refers to provinces. There are 21 aimag in Mongolia. Aimag are split into districts known as soums. There are approximately 330 soums in Mongolia. The average population of rural soums is 3000. Urban districts are known as duuregs.
At the local level, Soum governments will be challenged to effectively manage the significant increases in governance responsibilities and investment planning and execution delegated through the Integrated Budget Law (IBL) and Soum Program. The project would provide to local authorities and, training and technical assistance related to the implementation of the Local Development Fund (LDF) and Soum Program, in the areas of med-term planning, community participation, budget preparation and adoption, budget execution including procurement and supervision, reporting, monitoring and evaluation and pastureland planning and management.

This training and technical assistance would primarily be delivered through Soum Support Teams (SSTs), based in each Aimag (province). These teams would be provided with technical backstopping from national Technical Assistance providers, which would support the development of training curricula and materials and training of trainers. This system should enable close and frequent contact between the Aimag level teams and the Soum authorities and citizens. The SSTs and technical support would be funded with Swiss Agency for Development and Cooperation (SDC) co-financing.

At the national level, the project would provide technical support to central public administration organizations in charge of economic and finance issues related to the development and implementation of the Soum Program and LDF. For the Soum Program, which is still a piloting stage, technical assistance would be provided to Ministry of Economic Development (MoED) to elaborate and scale-up the program. This could include the review and assessment of the piloting phase of the Soum Program, the development of guidelines, manuals, rules and regulations governing the program as it scales up, and the strengthening of national level systems for the administration and monitoring of the program.

Component 2: Good Governance Performance-Based Support Program

Component 2.1: Performance-based Financing (PBF)
As an incentive for good governance, the project would support the provision of Good Governance Performance-Based Financing (PBF) to Soums for the financing of activities under the LDF. The objective of the PBF would be to enhance good governance in the entire budgeting process starting with financial and policy planning, including budget preparation and adoption, budget execution, accounting, reporting, internal and external control and public scrutiny. Financing and execution of public capital investments at Soum level and below is an important part of the budgeting process. Particular importance would be given to citizen participation, alignment of Soum budgets with bagh citizen priorities and citizen satisfaction with the LDF process and outcomes. Based on a Soum performance monitoring system, all Soums will be rated annually by independent assessors against a set of agreed performance indicators. Those Soums meeting or exceeding agreed targets would receive a percentage of the prior year’s LDF allocation as budget support in the following financial year. Currently it is proposed that this top-up would represent approximately twenty five percent of the previous year’s allocation, though this would be reviewed during the project and revised if necessary. PBF will be disbursed to qualifying Soums through Treasury systems along with LDF allocations.

Component 2.2: Annual Performance Assessments
The project would carry out Annual Performance Assessments (APAs) of Soums for the purposes of determining the allocation of Good Governance Performance-Based Financing. The assessment and ranking of Soum performance would be outsourced to a politically neutral third party (Good Governance Performance Assessment Teams). The project would finance the training of these APA teams. This sub-component would be supported by SDC co-financing.
Component 3: Project Management and Monitoring and Evaluation
A Project Implementation Unit (PIU) is placed within MoF. The third component would support this implementation structure, financing the costs of staff, related expenditures and the M&E, procurement and FM functions. M&E support would be supported by SDC and include developing a Management Information System (MIS) for the LDF, and conducting a baseline, mid-term and end of impact assessment.

Section B. Policy and Legal Requirements
This annex describes relevant aspects of the policy and legal framework in Mongolia and the requirements of World Bank safeguard policies.

B.1 Land law
The Mongolian Land Law provides for three types of land tenure:
- Freehold ownership: of housing plots in urban areas and cropland in rural areas.
- Possession: of rural land for between 15-60 years, either by individuals, groups or enterprises. Possession rights may be sub-let, passed on or sold.
- Usage rights: for a maximum period of 5 years. Usage rights may not be sub-let, passed on or sold to another party and compensation is not payable to the users if the land is requisitioned by the State.

Importantly, pastureland, hayfields, forest resources, land for common tenure (such as land around watering points or salt licks) and land for special government use may not be given into possession or ownership. However, there are proposals before parliament towards the end of 2006 to allow for possession contracts over pastureland. To date, usage contracts for a maximum period of 5 years have been issued to herder groups on a trial basis in several areas of the country (although not as part of SLP III). Soum and bagh governors are responsible for land administration, taking into consideration customary traditions of land use, conservation requirements and a rational schedule of pasture separation for winter, spring, autumn and summer settlements and reserve rangelands. The Land law establishes responsibility to the relevant governors to negotiate emergency access for its herders in the event of natural disasters or other emergencies requiring unforeseen livestock movements. Where an agreement between these governors cannot be reached, the case shall be resolved by a higher-level governor or the cabinet. The Land law stipulates measures to promote the rational use of seasonal pasture and hayfields and fines for breaching the regulations. Soum and district governors may allocate areas for hay cropping, companies and organizations based on proposals of Bagh or Khoroo Khurals.

The Law on Land fees and Law on land acquisition are also containing provisions relevant to land administration in Mongolia.

B.2 Local government
Local Government in Mongolia consists of 21 aimags, divided into 330 soums, which in turn divided into of 1,630 bags. The central body at all levels of local government is the Governor. The Governors are the representatives of the State and directly report to the respective higher-level Governors. The Governor of the aimag and city is proposed by the respective khurals and appointed by the Prime Minister.
The governor’s office in each aimag consists of the following units in addition to Governor and Vice-Governor: State Administration; Legal; Investment and Development Planning; Social Policy; Finance and Treasury; Monitoring Evaluation and Internal Audit. In addition, there are numerous agencies under the Governor such as Environment and Tourism, Food and Agricultural and Specialized Inspection. The Environment and Tourism department has 10-15 persons at the aimag level, in addition to the soum-level environmental inspectors and rangers. Analogously, soum Governor’s Offices are limited to a maximum of 20 - 30 persons, such as: Governor; Vice Governor; Head of Governor’s Office; Social Officer (education, health care and culture); Agriculture, Animal Health and Veterinary, Environmental Inspector and Ranger; Social Welfare Officer (poverty reduction, employment and social welfare); Tax officer; Finance division (head, treasure specialist, accountant); Land management officer; Legal and internal work officers; Archive officer and Bag governors.

Local government functions are set out in the Law on Administrative and Territorial Units and Their Governance. In addition, there are at least 29 other laws containing 280 provisions on the functions of local authorities. The aimag and soum governors receive numerous orders, guidelines, and directives from the upper level Government, line Ministries and agencies. However, the implementation of these orders and directives is often limited by the availability of financial and human resources. Local administrative staff often lacks the managerial and technical capability to design and implement appropriate service delivery and local development support programs.

B.3 Law on Territorial and Administrative Unit (1992)

The Law on territorial and administrative unit prescribes the setup and function of local Government in Mongolia. Citizens’ khurals are the basic decision-making bodies at the bagh, khoroo, soum, aimag levels, as well as in the capital, Ulaan Baatar. Aimag, capital, soum and district Citizens Representatives’ Khurals are convened no less than twice per year. Bagh and khoroo khurals are convened at least three times per year. The presidium sets the date for Citizens khurals and is Khural Chairman is responsible for chairing.

At the soum and aimag levels, the number of citizens’ representatives in each khural ranges from 21 to 41, depending on the size of the population within the administrative area. In Ulaanbaatar, there are 40 members in the citizens’ khural. Khural members at the soum, aimag and capital level elected by popular vote for a period of four years. All Mongolian citizens over 18 years of age may participate in bagh/khoroo public khurals and the meeting considered as valid if one of four bagh households and one of twenty-thirty central soum /khoroo households attended the meeting.

The Social Protection and Welfare Law regulates the types of social welfare pensions, benefits and service available to Mongolian citizens and prescribes the functions and structure of the social protection and welfare administration system. Social workers are designated at the soum and sub-regional level with the following responsibilities:

• To undertake a needs assessment of vulnerable groups and poor households and citizens
• To identify households and citizens eligible for social welfare benefits; and
• To consult with and provide training to improve capacity of vulnerable social groups, including the poor and extremely poor.

B.5 Ethnic Minority Policies
The Constitution of Mongolia stipulates “no person shall be discriminated on the basis of ethnic origin, language, race, age, sex, social origin and status, property, occupation and post, religion, opinion, and education.” (Constitution of Mongolia, 1992, Article 14, Chapter 2)

Government of Mongolia has approved a program to support of tsaatan community with its resolution No. 255 dated 17 December 2008. The total funding of the program is 624 million MNT, which supports only mountain tsaatan groups. Within this program, mongol gers and sun batteries were provided to each 62 households for their easy stay at soum center, and two room community building was built for their easy access to the bagh meeting with 12 million tugrig, each household received 10 goats for restocking, 20 reindeer were purchased from Russian Taiga to improve breeding, 6 tsaatan students received scholarship to study at the university, etc. In 2010, the soum government was planning to recruit two doctors who will be responsible for two Tsaatan tribes.

B.6 World Bank’s Operation Policy on Indigenous People (BP/OP 4.10)

This policy contributes to the Bank's mission of poverty reduction and sustainable development by ensuring that the development process fully respects the dignity, human rights, economies, and cultures of Indigenous Peoples. For all projects that are proposed for Bank financing and affect Indigenous Peoples, the Bank requires the borrower to engage in a process of free, prior, and informed consultation. The term “Indigenous Peoples” is used in a generic sense to refer to a distinct, vulnerable, social and cultural group possessing the following characteristics in varying degrees:

(a) self-identification as members of a distinct indigenous cultural group and recognition of this identity by others;
(b) collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories;
(c) customary cultural, economic, social, or political institutions that are separate from those of the dominant society and culture;
(d) an indigenous language, often different from the official language of the country or region.

Section C. Indigenous People Plan

C.1 Introduction

This Indigenous Peoples Plan (IPP) has been prepared for the Additional Financing of Third phase of the Government of Mongolia’s Sustainable Livelihoods Project (SLP III) in accordance with World Bank OP 4.10, “Indigenous Peoples.” The Project Development Objective is to improve governance and community participation for the planning and delivery of priority investments in rural Mongolia. This would be achieved through integrated project management which aims at a decentralized project management framework realized through the progressive devolution of project management responsibilities to aimag and soum (rural district) levels within local governments, while retaining overall coordination, monitoring and evaluation, and fiduciary oversight at national level throughout Mongolia from 2019 to 2022.

The program is expected to affect two groups with characteristics meeting the definition of “indigenous peoples” provided in the Bank’s policy. A social assessment been conducted, in which free, prior and informed consultations have resulted in expressions of broad community
support for project objectives, as well as desire to benefit from project activities. The overarching objective of the IPP is to ensure that project design affords culturally appropriate opportunities for these groups to participate in, and benefit from, the project.

C.2 Indigenous Peoples in Mongolia

There are more than 30 ethnic groups in Mongolia. All groups are either the descendants of Mongolian nomadic tribes or are groups of Turkic origin who have become Mongolised over time. The Khalkh make up the majority and comprise over 84.5% of the population and kazak 3.9%, durvud 2.4%, Bayad 1.7% and 1.3% is Buryat. Except for the Kazakh minority group residing in western Mongolia, all ethnic groups speak Mongolian dialects which are comprehensible to speakers of Khalkha and to each other. The Kazakhs also are the only ethnic group that relies primarily upon a distinct native spoken and written language- Kazakh language.

Most Mongolia’s ethnic minority groups share similar customs, traditions and systems of production as the Khalkh. With the exception of the predominantly Muslim and linguistically differentiated Kazakhs in western Mongolia, and traditionally nomadic reindeer-herding Tsaatan peoples in the north, Mongolia’s ethnic groups are not considered to be economically, socially or legally marginalized or otherwise disadvantaged in a manner which would restrict their ability to participate in the project. This IPP is therefore applicable only to Tsaatans and Kazakhs. Consultations undertaken as part of the social assessment process indicate that potentially affected peoples do not anticipate that AF of SLP III will generate any adverse impacts. However, there are concerns that the Tsaatans and Kazakhs have characteristics that may restrict their ability to participate in, and benefit from project.

C.2.1 Tsaatan and SLP III

Traditionally, the Tsaatan live in the taiga (boreal) forest in Tsagaannuur Soum, in the far north of Khuvsgul Aimag. Their traditional livelihoods are based on reindeer breeding. Tsaatan’s reindeer forage on plentiful lichen in the forests. The Tsaatan travel by reindeer, consume their milk, use the hides for clothing and shelter, and consume the meat of the older animals that are no longer suitable for transport or milk production. The Tsaatan are particularly vulnerable owing to their low population, decline in traditional livelihoods, high incidence of poverty and geographic and economic marginalization, and a reduction in reindeer breeding ability, reduced reindeer birth weights and other health issues.

During the SLP III, the project team members visited\(^2\) to Tsaatan community to inform and educate about LDF and SLP III project activity and consult on their needs in regard health, education, livelihood support. Several elder people mentioned about shortage of medicines that are sold at subsidized prices. Tsaatan expressed a desire for veterinary assistance in stopping the decline of reindeer herds, through measures such as improved disease treatment and introduction of improved breeding stock. Communication system with soum center was another issue. The community members unable to articulate their needs due to lack knowledge and skills to define their challenges they face daily that can be considered as sub-project to be financed by LDF.

The population of Tsagaannuur Soum in 2019 totaled 1995 of whom 901 people live in central bagh, while 1077 live is remote bagh. Tsaatan minority compose 16.8% out of total residents in central bagh, while in remote bagh the Tsaatans compose 34.7% of the bagh residents. There are around 335 tsaatan people divided into 85 households (to compare with 80 HHs as reported in the 2013) maintain their traditional alpine lifestyle based on reindeer breeding based in the Taiga

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\(^2\) June 2019.
forest. Total 2159 reindeer was counted in 2017 livestock census. The Tsaatan communities are divided into two tribes, called ‘otog’, by their location, as Western and Eastern tribes. As of 2006, there were 335 Tsaatans in the Western and Eastern Taiga. Other Tsaatans or Tsaatan descendants in the soum center and lower areas generally live among, and much the same as, neighboring Khalk. Provisions of the IPP refer, then, primarily to the remote Tsaatan living in Eastern and Western Taiga forests.

The principal issue identified by the Tsaatans in consultations is that those who maintain traditional lifestyles in remote areas will be excluded from participating in project decision-making processes, and hence will not be afforded equitable opportunities to benefit. Furthermore, for the remote Tsaatans, traditional tribal decision-making processes differ from other citizens’ khurals.

The Tsaatans in consultations voiced concern that any proposals they may have would be turned down for reasons of poor quality, or because they would not be in line with wider soum priorities potentially benefiting larger numbers of people. The Tsaatans voiced concern that special attention may be needed for their needs, such as access to veterinary services and improving reindeer breeding stock. Further on challenges to get funding from LDF were:

Collecting sub-project proposal by questionnaire is practically not possible in this context because of seasonal factors as well remoteness of IP location. Per LDF regulation, the bag governor should distribute questionnaire and collect back from households by end of April. It is impossible for bag governor with motorbike (even with good intention) to reach IP location given winter/spring road condition in taiga forest.

Final list of sub-projects prioritized at bag meeting: As number of tsaatan is smaller than people live in steppe areas, it is hard to get vote at bag meeting and get support on sub-project ideas proposed by tsaatan person. The tsaatan community leader pointed that “the proposals collected from us, will be disqualified at final voting process at bag meeting due to number of tsaatan people will be fewer”. He continued, “it is merely impossible for us to have sub-project get supported when majority of the people are from steppe area” and “it is natural that they wouldn’t support our proposal over theirs”. “Such situation makes us even not to join the bag meeting”.

Weak community organization: The community members unable to articulate their needs and issues they face and proposing options to overcome by prioritizing and bringing/communicating it with upper level government. The empowerment of community would require careful plan with experienced and knowledgeable expert who has skills in use of different community participation tools/instruments. Such facilitation will enable the community to see their needs in much more comprehensive way and raise their concern to local government in much more constructive way. At the end, local government will have a better picture on needs of these people and find ways to help via LDF resource.

To summarize, the Tsaatans in consultations suggested that the project incorporate measures to ensure their representation, combined with special measures as needed to ensure that they are afforded opportunities to make their specific preferences known, along with measures to ensure that they are afforded opportunities to benefit from the local development funds.

C.2.2 Kazakhs and SLP III
Comprising 3.9% of the population of Mongolia, the Kazakh are the largest ethnic minority group. While language differences and their Islamic beliefs may make ethnic distinctions appear to be more marked between the Kazakh and the Mongol subgroups, Kazakh livelihoods are not significantly different from those of the Mongol subgroups. Local statistics (Bayan-Ulgii aimag, 2012) suggest that approximately 75.6% of Mongolia’s roughly live in Bayan Olgii aimag while around 8.9% live in Khovd aimag, 2.4% in Darkhan-Uul aimag, 0.9% in Tuv aimag, 0.6% in Orkhon aimag, 0.5% in Khentii aimag. Because there are no significant concentrations of Kazakhs elsewhere, the IPP is applicable only in these two aimags.

As most Kazakhs living in the westernmost aimags of Bayan Olgii and Khovd do not speak or read Mongolian to a level of proficiency that would allow them to participate in project activities in Khalkha, it is necessary to ensure that Kazakh community members are adequately informed about LDF and its process of participation; improving the awareness/understanding of the soum local government officials and community members about results of annual performance assessment (APA) under SLP III project and that both written and verbal project information is available in both Mongolian and Kazakh languages.

C.2.3 Planning Measures to Benefit Tsaatan Communities

In response to suggestions received in consultations undertaken as part of the SLP-III social assessment process as well as recent mission in 2019 by the PIU, following specific features have been incorporated into project design to ensure that traditional Tsaatan communities have an equitable opportunity to participate in project processes, and to benefit from project activities. These measures are as follows:

**Measure 1: Ensuring Tsaatan people representation in the community facilitation, supervision and evaluation**

Because the reindeer-herding groups live in remote areas and generally do not participate in soum center activities, they generally are not represented in local decision-making. Those involved in decision-making processes at the soum level have little contact with remote Tsaatan and little familiarity with their needs and preferences. Moreover, they understandably can be expected to represent the interests of the broader majority in soum (or khural) deliberations.

Article 12.2 of the Annex 1 to Finance Minister's Order No. 144 of November 19, 2012 “The procedures for formulating local budget proposal “states that Citizens' and public participation in planning of investment, programs, projects and activities implemented with soum and district's local development fund shall be ensured.

The ALST will ensures communication between the Tsaatan communities and the LDF and the Bagh meetings, and will assist the communities in preparation of LDF proposals. To ensure quality of sub-projects implemented in the Tsagaannuur soum, especially in the remote bagh, tsaatans will be provided with opportunity to supervise quality of the sub-projects through community supervision and evaluation, Tsaatans will have opportunity to express their opinions and demand high quality of investments.

**Measure 2: Alternative method for submission of LDF proposals**

SLP-III ALST will ensures that their representations in the bagh meetings at the soum level should be higher. Tsaatan facilitators will play an important role in facilitating the Tsaatans’ participation in the bagh meetings, and vote for their own project ideas and as well as for other projects. Moreover, they are constrained in their ability to meet and by their ability to prepare...
competitive LDF proposals. To address this issue, and with the assistance of the Tsaatan community facilitator, the Eastern and Western Taiga tribal communities may prepare their own project proposals in keeping with their own traditional decision-making processes, and may propose their proposals to the bagh meetings together with other proposals.

Measure 3: The LDF regulation was revised in 2019 by including Focus Group Discussion as a method to collect sub-project proposals. The PIU, ALST of the Huvsgul aimag will use FGD given the isolated location of Tsaatan.

Measure 4: Explore possible options on to ensure sub-project ideas proposed by Tsaatan discussed and supported at bag meeting.

C.2.4 Planning Measures for Kazakh Participation

SLP III will incorporate the planning measures to ensure equitable Kazakh representation in decision-making, and to ensure access to documentation in Mongolian and Kazakh language, in Bayan Olgii, Khovd, Darkhan-Uul and Orkhon aimags. Specifically:

Measure 1: Engagement of community leader and soum LDF working group members in Bayan Olgii and Khovd aimags. In areas in which Kazakhs constitute even small proportion of the local population, such as in Selenge (0.5%), Tuv (0.9%), Dornogov, Uvs and Govsumber (0.2%) summary of project implementation manuals, module training material, APA results and other relevant information will be made available in Kazakh language. In areas where Kazakhs constitute most of the population, project proceedings, including bagh meetings conducted in Kazakh and Mongolian languages. The Kazakh interpretation will be provided as necessary to ensure effective communication at bag meetings.

Measure 2: Strengthening the capacity of the Bayan-Ulgii ALST members through creating cross learning opportunity from other aimag or soum whose APA performance rating maintained above the average score.

D. Grievance Redress Mechanism (GRM)

The GRM is documented in the project ESMP to ensure effective integration between environmental and social issues affecting development outcomes. The project focuses first and foremost on effective community consultation and engagement so that stakeholders are meaningfully engaged in the project at all stages.

The GRM will also assist in addressing affected persons’ concerns and complaints promptly, using an understandable and transparent process that is gender responsive, culturally appropriate, and readily accessible to the affected persons at no cost. The communication consultant at PIU assigned as focal person for management of the GRM with help of the Local project officers in Huvsgul and Bayanulgii aimags. People will be able to access the GRM using their preferred/most accessible modality and their preferred language. Grievances will first be brought to the attention of the communication consultant in the Project Implementation Unit. Complaints can be submitted following channels:

Phone: 70009828
Email: info@slp3.mn
Website: [http://tusuv-ornnutag.mof.gov.mn](http://tusuv-ornnutag.mof.gov.mn)
Facebook: [facebook.com@LDFMongolia](https://facebook.com@LDFMongolia)
Twitter: [https://twitter.com/MongoliaSlp3](https://twitter.com/MongoliaSlp3)
Letter: SLP3 project office, Ulaanbaatar-15160, Chingeltei district, Khoroo 4, Ankara street -23, Tod tower, 8th floor.
Direct visit to Local project officer based in each Aimag.

E. Institutional arrangement and budget to implement IPP

<table>
<thead>
<tr>
<th>No.</th>
<th>Stakeholders</th>
<th>Types of activities</th>
<th>Responsibilities and duties</th>
<th>Budget (USD)</th>
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</thead>
<tbody>
<tr>
<td>1.</td>
<td>SLPO</td>
<td>Implementation support IPP</td>
<td>- Monitoring visit to soum  &lt;br&gt; - Holding training on inclusion of EM in LDF  &lt;br&gt; - Send to the World Bank the progress report for the IPP implementation once every year</td>
<td>20,000</td>
</tr>
<tr>
<td>2.</td>
<td>LPO/ ALST of Bayan-Ulgii aimag</td>
<td>Support an implementation and monitoring of measures in IPP</td>
<td>- Integration of aimag development plan with IPP  &lt;br&gt; - Organizing a one-stop-shop services once a year  &lt;br&gt; - Organize a training on community development together with SLP III</td>
<td>20,000</td>
</tr>
<tr>
<td>3.</td>
<td>LPO/ ALST of Huvsgul aimag</td>
<td>Support an implementation and monitoring of measures in IPP</td>
<td>- Prepare annual work plan (1stop shop service est) dedicated for IP people on LDF and submit to PIU/reviewed by ALST  &lt;br&gt; - Coordinate with soum governor team to implement plan  &lt;br&gt; - Prepare a report and submit to PIU once the planned activity completed</td>
<td>30,000</td>
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<td></td>
<td>TOTAL</td>
<td></td>
<td></td>
<td>70,000</td>
</tr>
</tbody>
</table>

F. Disclosure

In addition to routine disclosure of this IPP in English, Mongolian in all aimags, the IPP was prepared and disclosed in Kazakh language. Printed copies of IPP was placed in the citizen hall and public libraries in 21 aimag center.
Section E. Consultation meeting

Two round consultations held to discuss and collect feedback on draft ESMP and IPP. The PIU a sent-out copy of draft IPP along with letter with detailed information on purpose of consultation, location and time. Follow-up call was also made with respective aimag’ administration and local project officer. The local project officer further worked with soum administration of Tsagaannuur of Huvsgul aimag.

The month of January is considered coldest period of the year. Such condition creates difficulty for local people to travel for long distance. Due to travel safety issue, the PIU organized consultation in aimag center and gasoline was provided for vehicles that coming from soum to town. The consultations held in Mongolian language and interpreter with Kazak language was made available at consultation.

E.1 Consultation meeting held in Murun city of Khuvsgul aimag

<table>
<thead>
<tr>
<th>Consultation with Project-Affected Groups</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Date:</strong> 08 January 2020</td>
</tr>
<tr>
<td><strong>Location:</strong> Murun city of Khuvsgul aimag</td>
</tr>
<tr>
<td><strong>Chaired:</strong> Mr. Gansukh Gongor, ESMP consultation</td>
</tr>
<tr>
<td><strong>Summary of the consultation:</strong> Total of 28 participants, representing the community of Murun, Khatgal village, Alag-Erdene, Arbulaq and Tsagaannuur soums. (The list of participants is attached in Table E2.4.) Regarding the presentations presented during the discussion, the participants made the following suggestions</td>
</tr>
<tr>
<td><strong>Q and A session:</strong> H. Gan-Ochir, Chairman of Governor’s Office of Khuvsgul Province, has thanked the discussion participants, summarized the SLP 3 achievements and outcomes and emphasized that further implementation of the SLP 3 would have a greater impact on the aimag and soum. He asked the participants to contribute to the ESMP with suggestions and propose specific activities to reduce and mitigate the potential adverse impacts on their lives and the environment, after precisely determining them. Ts. Marmalmaa, Head of the Finance Department, Khatgal village. Agree with the issues covered by the ESMP and IPP. All required issues have been addressed. The LDF is a transparent and lucrative fund, and many projects have been implemented since 2013. There is no adverse impact on ES from implemented projects in the past. 1. Residents’ proposals are taken and ranked and discussed in bag meeting, however only a few participate in bag meeting so they reject the proposals. Therefore, it is wrong to discuss proposals at bag meeting. 2. Proposals are made at bag level and they ranked at soum level. The reason why Khatgal village lags behind in training and promotions is because all the project related matters go through Alag-Erdene soum, as well as the project reports go through Alag-Erdene soum which in result the Khatgal rank decreases. 3. Improving waste management is a pressing environmental issue in Khatgal village and around the shores of Khuvsgul Lake.</td>
</tr>
</tbody>
</table>
D. Yalalt, Chairman of Governor’s Office of Tsagaannuur soum
Since more than 90% of the soum territory is included in PA, the article on "no support shall be given to activities that impact on ecologically vulnerable areas" should be changed, therefore please address the matter of implementing SLP activities in PA from an environmental aspect. It's very difficult to go to the taigas during summer, so it's hard to organize trainings and promotions and for up to 4 months during winter men go on 'otor' movement leaving women to stay, which makes it difficult to take proposals. Therefore, it is best to make a schedule to organize training with the LDF specialist, EI and project staff. Proposals by the reindeer herders are often postponed when LDF activities discussed at bag meeting. So please support the possibility of specifically prioritizing the proposals from reindeer herders.

Including reindeer herders into veterinary service is needed. Please support the reindeer vaccination within the project framework. The number of reindeer is expected to increase and the current reindeer headcount is 2600. The previous SLP project has been very successful in improving the health and quality of the reindeer and therefore these measures should be continued. Reindeer herders need Tuva language training, therefore please provide book materials.

Ya. Erdenejav, Tsagaannuur soum EI
There is a great need for research and determination of reindeer pasture resources in PRMP. In the West and East taigas, pasture degradation tends to increase. Carry out activities in the area of waste management and toilet issues arising from private entities. Implement measures aimed towards increasing the revenues from tourists arriving in tourism region. Since the main pastureland of the reindeer are in PA, collaboratively discuss and plan together with the PA's administration, soum and bag to increase the reindeer herders' potential to migrate in accordance with the PA's protection zones. Renovation and improvement of waste sites. The ESMP and the IPP covers the key issues.

Enkhbayar, Alag-Erdene soum
Cease the way of making reindeer appear as an entertainment tool, be aware that the people who are using reindeer as an entertainment tool do not provide animal welfare, but for business purposes only.

Byambasuren, Arbular, Chairman of Governor’s Office
With the development of tourism in the local area, the income opportunities for the locals have increased. Consequently, major tourist roads are being flooded and damaged, leaving people unable to drive. Therefore, please support the redevelopment and creation of wells as an improvement of water supply, as well as repair of tourist roads.

Batdorj, Alag-Erdene, Chairman of Governor’s Office
The LDF is the only fund that provides financial opportunities in the local area and this fund enhances the effectiveness of the SLP. No activities
funded by the LDF have any adverse effects on the environment and society. Consequently, ESMP and IPP are supported. Please be aware that the fund investment is decreasing, therefore please increase the amount. There is a great need of support from LDF for the Governor's office, however, it is prohibited by the regulation. More training needed for capacity building for soum officials, specialists, bag governor, herders, and locals. Provide methodology training for citizens on how to prepare project proposals and initiate project activities funded by LDF.

*Battulga, Director of FAD in Khuvsgul aimag*

The name of the Livestock Breeding and Veterinary Unit (LBVU) of the soum was renamed as Agriculture Unit (AU). The AU has been established with three positions: Specialist for Livestock Production Planning, Management, Breeding and Registration, specialist for Food, SMEs and Cooperative, and specialist for Pastureland, Agriculture and Water Supply. Therefore, it is needed to change the name of these positions when addressing in ESMP.

The AU specialist for pastureland, agriculture and water supply will be responsible for the implementation of PRMP within the project framework. When organizing training for professionals, the trained staff need to be trained so that they can provide training and counseling to herders and locals.

*S. Ganbat, Tsagaannuur soum, tsaatant*

Due to the inaccurate study of the territory and lifestyle of the reindeer herders, when establishing the PA, reindeer herders are having difficulties to migrate. Poor information and introduction are given to the reindeer herders about ecologically vulnerable, protected areas and its protection zones and regulations. Without taking the traditions of life into account, there has been a great deal of fine and prohibition on the reindeer herders. Reindeer herders have been well conserving and adapting with the ways of the nature. However, the Red Taiga PA Administration claims that reindeer herders are harming nature; they do not collaborate with the reindeer herders, where they are not allowed to migrate deep into the PA during summer and fall and doesn't allow them to carry a gun. As the number of reindeer grows, there is a need for expanding pastureland. This needs to be taken into account and supported.

From all the proposals made by the participants the most relevant to the ESMP and IPP have been compiled as follows in Table E-2.1

**Table E-2.2. Proposals by the Participants**

<table>
<thead>
<tr>
<th>Date of the Discussion</th>
<th>Venue of the Discussion</th>
<th>Participants</th>
<th>Proposals and conclusions by the discussion participated stakeholder and representatives</th>
<th>Project planning of the additional funding of SLP 3 and the proposals on how to settle the issues during implementation process</th>
</tr>
</thead>
<tbody>
<tr>
<td>January 8, 2020</td>
<td>Total of 28 participants, including Chairman of Governor’s Office and community representatives of Murun, Khatgal village, Alag-Erdene, Arbulag and Tsagaannuur soums</td>
<td>• No activities funded by the LDF have any adverse effects on the environment and society. Consequently, ESMP and IPP are supported.</td>
<td>• ESMP implemented in the previous phase can be implemented</td>
<td></td>
</tr>
<tr>
<td>----------------</td>
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<td>----------------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>Murun city, Khuvsgul province</td>
<td>• Support and implement infrastructure improvement measures to increase revenue for incoming tourists in the tourism region</td>
<td>• Carry out activities in the area of waste management and toilet issues from tourism</td>
<td>• When funding tourism infrastructure from the LDF within the framework of the SLP, more support is needed for the standardized improvement of waste management and sanitation facilities</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Renovate and improve waste disposal sites.</td>
<td>• Improving waste management is a threatening environmental issue in Khatgal and around the shores of Khuvsgul Lake.</td>
<td>• Environmental Inspector (EI) is responsible for overseeing the waste management in towns and villages near rivers and lakes in accordance with applicable laws, regulations and standards</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Improving waste management is a threatening environmental issue in Khatgal and around the shores of Khuvsgul Lake.</td>
<td>• Carrying out activities in the area of waste management and toilet issues from tourism</td>
<td>• No support is given for any project activities in the Water Source Protection and Sanitary Zone</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• There is an urgent need for reasoned identification and study of reindeer pasture resource in PRMP.</td>
<td>• The growing number of reindeer requires in need for expanding pastures, in which pasture degradation is likely to increase in the West and East taiga.</td>
<td>• Add organization issues of the management and study reindeer pastureland resource capacity in PRMP of the soum.</td>
<td></td>
</tr>
</tbody>
</table>
The name of the Livestock Breeding and Veterinary Unit (LBVU) of the soum was renamed as Agriculture Unit (AU). The AU has been established with three positions: Specialist for Livestock Production Planning, Management, Breeding and Registration, specialist for Food, SMEs and Cooperative, and specialist for Pastureland, Agriculture and Water Supply.

Therefore, it is needed to change the name of these positions when addressing in ESMP.

The AU specialist for pastureland, agriculture and water supply will be responsible for the implementation of PRMP within the project framework.

More training needed for capacity building for soum officials, specialists, bag governor, herders, and locals. Provide methodology training for citizens on how to prepare project proposals and initiate project activities funded by LDF.

There is a great need to organize methodology training for herders on how to regulate pastureland resource capacity and prevention methods.

When organizing training for professionals, the trained staff need to be trained so that they can provide training and counseling to herders and locals.

The proposals of the reindeer herders are deferred when LDF activities discussed in Bags. Therefore support the possibility of the procedure to specifically prioritize the proposals of the reindeer herders.

Research and implement issues for adding procedures that supports the activities regarding interests of the ethnic minority.

<table>
<thead>
<tr>
<th>№</th>
<th>Name</th>
<th>Soum name</th>
<th>Position</th>
<th>Phone</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Kh. Gan-Ochir</td>
<td>Khuvsgul aimag</td>
<td>Chairman of Governor’s Office</td>
<td></td>
</tr>
</tbody>
</table>

Table E2.2. The participants from public discussion organized in Murun city, Khuvsgul province
E.2 Consultation meeting held in Ulaanbaatar city

| Date: | 15 January 2020 |
| Location: | Ulaanbaatar city |
| Chaired: | Mr. Gansukh Gongor, ESMF consultant |
| Summary of the consultation: | A total of 25 participants, including staffs of Governor’s Office and representatives of soum officials and locals of Bayan-Ulgii, Dundgobi, Tuv, Selenge aimags and staffs of SLPIU. Regarding the presentations presented during the discussion, the participants made the following suggestions |
| Q and A session: | 1. Potential environmental impact within the SLP framework |

Comments and suggestions by the representatives of Selenge aimag.
- During spring and fall dry seasons, a bushfire in the pasture and haylands causes damage to the environment and pastureland
- Adverse impacts rise due to violation of the procedures of chemical fertilizer and pesticide storage and usage for vegetable growing
- Increased waste due to no waste recycling and reusing
• Pollution can occur due to lack of sanitation and toilet facilities along the tourist sites and along the central road
• Potential loss of wildlife habitats migration due to increased area of fenced hayfields
• Increased land erosion due to lack of flood protection dams in soum centers

Comments and suggestions by the representatives of Bayan-Ulgii aimag
• Soil pollution occurs due to pasture overgrazing
• Air, soil and water pollution occurs due to inadequate waste disposal site in soum and village
• Contamination of soil and drinking water sources due to inadequate toilet and sanitation facilities
• Land erosion increases due to procedure violation of flood dam usage and poor monitoring
• Land degradation and loss of plant cover around the areas of livestock dipping facility

Comments and suggestions by the representatives of Dundgobi aimag
• Direct the SLP 3's additional funding project to integrate with previous phase projects to implement as a complex project in order to improve the sustainability of previously created capacity
• Provide locals with project information and create correct understanding
• With the introduction of new breeds of animals from abroad to increase livestock productivity, new diseases and parasites may increase.
• Require to classify and recycle waste for LDF funded projects within SLP framework
• Protection, renovation of springs and water source have been done without precise planning, therefore it is resulting in adverse impact of springs and water sources to dry out.
• Required retraining of relevant provincial and soum Governor's Office specialists in Environmental Assessment and Monitoring

Comments and suggestions by the representatives of Tuv aimag
• The precise location and disposal of livestock manure and construction waste are urgently needed. Water and air pollution often occurs as a result of indefinite or incorrectly located waste sites.
• There is a high risk that the soum's cultural heritage will be adversely impacted if not identified and displayed in the map.
• Adverse impact on environment and population health occurs due to weak requirements on quality control for construction materials used in LDF funded construction activities within the SLP framework.
• Consider how the activities of the new project will have an impact on the activities of the previous phase, on stabilization and continuation of the outcomes.

Comments and suggestions by the representatives of Dundgobi aimag
• Need to organize training for herders on improving livestock breeds.
• Environmental contamination occurs due to poor waste management
• Provide promotion, training and information for locals
• Educate staff of Governor's Office in environmental and social impact assessment methodologies
• Well reflect environment, natural resources and infrastructure of the soum in the mapping
• The aimag and soum budget should be clearly planned to cover the cost of implementing the ESMP and IPP to mitigate and prevent adverse impacts
• Employ environmental consultant in ALST

Comments and suggestions by the representatives of Selenge aimag
• Establish and operate an ALCT-like team in each soum
• It is necessary to improve the understanding and methodology about SLP by training the newly appointed Governors, Chairman of Bag Khural and Bag Governors as all CRKh of all soums will be newlyelected this year
• Enhance awareness of people with disabilities about the project and consider involving them in project activities
• Disseminate best practices for improving environmental and social protection within the SLP 3 framework
• Print and distribute a list of required ESIA materials to the community
• Provide training and promotion to improve public awareness about the proposal and development of LDF funded activities

Comments and suggestions by the representatives of Bayan-Ulgii aimag
• Conduct research to determine the current status of land, soil and water pollution
• Conduct crisis and disaster management training among locals
• Monitor all activities implemented by the LDF and require rehabilitation of the land where commonly used minerals (sand and gravel) are used for construction purposes
• The matter of reprocessing the waste from meat and leather processing units must be attended with importance.
• Train members of Sustainable Development Department
• Train and build capacity for Bag Governors and Chairman Bag Khural
• Provide locals with information through tribe leaders
• Train and build capacity for CRKh representatives

Comments and suggestions by the representatives of Tuv aimag
• Improve understanding and knowledge of local residents about ESMP and IPP
• Inform locals and local communities about the mitigation measures of potential adverse impacts that can occur within project framework
• Require landscaping the surroundings of any building funded by the LDF
• Conduct environmental assessment in prior and post stages of subprojects
• Conduct further sustainability assessment of the sub-project
• Conduct pastureland capacity research prior to developing PRMP
• Report outcomes and results of the sub-projects to local residents
• Train soum EI to build capacity to conduct monitoring for ESMP
From all the proposals made by the participants the most relevant to the ESMP and IPP have been listed as follows. (Table E-2.3)

**Table E2.3. Proposals by the Participants**

<table>
<thead>
<tr>
<th>Date of the Discussion</th>
<th>Venue of the Discussion</th>
<th>Participants</th>
<th>Proposals and conclusions by the discussion participated stakeholder and representatives</th>
<th>Project planning of the additional funding of SLP 3 and the proposals on how to settle the issues during implementation process</th>
</tr>
</thead>
<tbody>
<tr>
<td>January 15&lt;sup&gt;th&lt;/sup&gt;, 2020</td>
<td>Corporate and Convention Center, Ulaanbaatar</td>
<td>A total of 25 participants, including staffs of Governor’s Office and representatives of soum officials and locals of Bayan-Ulgii, Dundgobi, Tuv, Selenge aimags and staffs of SLPIU</td>
<td>• During spring and fall dry seasons, a bushfire in the pasture and haylands causes damage to the environment and pastureland</td>
<td>• Address pastureland fire prevention measures in PRMP</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Pollution can occur due to lack of sanitation and toilet facilities along the tourist sites and along the central road</td>
<td>• When funding tourism infrastructure from the LDF within the framework of the SLP, more support is needed for the standardized improvement of waste management and sanitation facilities</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Increased waste due to no waste recycling and reusing</td>
<td>• Environmental Inspector (EI) is responsible for overseeing the waste management in towns and villages near rivers and lakes in accordance with applicable laws, regulations and standards</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Air, soil and water pollution occurs due to inadequate waste disposal site</td>
<td>• Require to classify and recycle waste for LDF funded projects within SLP framework</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• The precise location and disposal of livestock manure and construction waste are urgently needed. Water and air pollution often occurs as a result of indefinite or incorrectly located waste sites.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Potential loss of wildlife habitats migration due to increased area of fenced hayfields</td>
<td>• Add organization issues of protection measures into PRMP instead specifying definite area to build fence as a hayfield.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Contamination of soil and drinking water sources due to inadequate toilet and sanitation facilities</td>
<td>• Implement and address the matter of establishing toilet and sanitation facilities near any establishment funded by the LDF.</td>
</tr>
</tbody>
</table>
Protection, renovation of springs and water source have been done without precise planning, therefore it is resulting in adverse impact of springs and water sources to dry out.

- Required retraining of relevant provincial and soum Governor's Office specialists in Environmental Assessment and Monitoring
- Educate staff of Governor's Office in environmental and social impact assessment methodologies
- It is necessary to improve the understanding and methodology about SLP by training the newly appointed Governors, Chairman of Bag Khural and Bag Governors as all CRKh of all soums will be newlyelected this year.
- Disseminate best practices for improving environmental and social protection within the SLP 3 framework

Conduct ESIA and make planning for protection and renovation activities of springs and water sources.

- Add additional training curriculum plans to ESIA and IPP
- When organizing training for professionals, the trained staff need to be trained so that they can provide training and counseling to herders and locals.

The participants from public discussion organized in Ulaanbaatar

<table>
<thead>
<tr>
<th>№</th>
<th>Name</th>
<th>Soum/city</th>
<th>Position</th>
<th>Contact</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Mr. Enkhbat. M</td>
<td>Ulaanbaatar</td>
<td>SLPO, Senior specialist</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Ms. Odsuren. G</td>
<td>Ulaanbaatar</td>
<td>SLPO, specialist</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Mr. Munkhbayar.</td>
<td>Ulaanbaatar</td>
<td>SLPO, specialist</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Mrs. Urjinkhand.B</td>
<td>Dundgobi aimag</td>
<td>AGO, chairman of CTSU</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>Mrs. Khulan.S</td>
<td>Dundgobi aimag</td>
<td>AGO, Social Policy officer</td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>Mrs. Tumendelger.J</td>
<td>Dundgobi aimag</td>
<td>Secretary, CRKh</td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>Mrs. Uyanga.E</td>
<td>Dundgobi aimag</td>
<td>Specialist of ADET</td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>Mrs. Enkhtuya. B</td>
<td>Dundgobi aimag</td>
<td>SLP-3 coordinator</td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>Mrs. Munkhsaruul. J</td>
<td>Dundgobi aimag</td>
<td>Vice Governor</td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>Mr. Erdenetsogt. S</td>
<td>Tuv aimag</td>
<td>Specialist of ADET</td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>Mrs. Tungalag.B</td>
<td>Tuv aimag</td>
<td>Officer of SGO</td>
<td></td>
</tr>
</tbody>
</table>
Section D: Information Disclosure

The Indigenous People’s Plan was disclosed in the following approaches:

1. Placing copy of IPP in locations, including:
   a. LPO offices
   b. Public libraries in Aimag center
   c. Citizen Hall in Aimag center