

NGOs AS ACCOUNTABILITY PROMOTERS: IN THE MONGOLIAN CASE*

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INTRODUCTION

Accountability is considered to be one of the main characteristics of democratic countries, but its implications in practice are mixed. In accountability literature, much research has examined accountability issues in developed countries where societies as a whole are 'relatively' accountable. However, accountability issues confronting developing countries can be quite different than those of developed countries because of their political, economic and social circumstances and their cultural features.

The states in many developing countries, particularly in post-communist countries, often have poor governance and institutions, a lack of political will to be accountable to the public, and have social problems, such as corruption and nepotism, that restrain higher officials and public servants from performing with high morality. Similarly, business also falls short of considering their stakeholders and performing in a socially and environmentally responsible way. The public, in these newly democratic countries in transition, are often unaware of democracy and their democratic rights, and lack a participatory mindset because of their culture and old societal regimes. Given this kind of society, civil society organizations, namely NGOs, have played an important role to encourage accountability, democracy and participation in these countries.

In this respect, the paper aims to examine "How are NGOs operationalizing accountability in transition countries, particularly in Mongolia?". In many post-communist transition countries, there are often a lack of accountability mindsets among the state, business and the public. Despite criticism of their accountability, representation of the public and a lack of institutional and human capacity, NGOs are

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generally seen as an accountability promoter in many countries. Therefore, two Mongolian NGOs have been introduced in this paper.

After a peaceful democratic revolution in 1990, the country has experienced a transition period from the authoritarian communist regime with a centrally-planned economy towards a democracy with an open market economy. Numerous radical changes have been made in its political, economic and social environment. Since the mid 1990s, there has been a rapid increase in mineral exploration and mining as a result of favourable mineral and taxation laws aimed at attracting foreign investment into the sector, world mineral demand and price, and discoveries of potential mineral deposits. Consequently, the role of the mining sector has increased dramatically in the Mongolian economy. However, with the growing mining enthusiasm seen it as the potential economic engine for development, its social and environmental negative impacts need to be addressed. Therefore, a growing number of local and international NGOs started to engage in activities to raise mining awareness in society, address mining-induced environmental issues and promote socially and environmentally sound mining.

Case studies of two local NGOs show that there is an emergence of various forms of NGOs in Mongolia with their different strategies to achieve their goals. The Onggi River NGO as a challenger NGO acts in a more activist way, while the Responsible Mining Initiative NGO chose to work as a cooperative NGO which attempts to develop a multistakeholder dialogue between mining constituents with conflicting views. Through their development, NGOs are not only learning themselves, but they also encourage a social learning process and promote an accountability mindset that lacks in society.

The paper is organised as follows. In the first section, literature on NGOs and accountability is briefly reviewed. The criticism of NGOs' accountability is discussed along with the debate that sees NGOs as accountability promoters. The research method section is briefly discussed. The third section introduces the background information of Mongolia and its NGO sector. Two case studies of local NGOs are discussed along with their potentials.

1. 1 NON-GOVERNMENTAL ORGANIZATIONS (NGOs)

a. CIVIL SOCIETY

To understand NGOs, we need to understand the civil society, to which NGOs belong. Although the term 'civil society' has been largely used since the late twentieth century, the concept and meaning of civil society dates back to at least the time of Hobbes and Locke (Robertson, 1986, cited in Gray et al., 2006). As the London School of Economics Centre for Civil Society defines:

'[c]ivil society refers to the arena of uncoerced collective action around shared interests, purposes and values. In theory, its institutional forms are distinct from those of the state, family and market, though in practice, the boundaries between state, civil society, family and market are often complex, blurred and negotiated. Civil society commonly embraces a diversity of spaces, actors and institutional forms, varying in their degree of formality, autonomy and power' (2004).

In this respect, a voluntary association in civil society, based on shared moral and intellectual sentiments (Seligman, 1992), gives an opportunity to take a collective action (Olson, 1971) to achieve some desirable ends which are hardly attainable by an individual action (Teegan, Doh, & Vachani, 2004, p. 465). This collective action can arise from either broader social concerns or from marginalization of certain

individuals (Skocpol, 2002; Worms, 2002) and thereby it aims to ‘shape the larger political and social reality’ (Pharr, 2003) and to ‘invoke public debate on common concerns’ (Habermas, 1989; Perez-Diaz, 1998, cited in Teegan et al., 2004). Therefore, many civil society organisations pursue ‘political ends’ outside the ‘state apparatus’ (Salamon, 1994).

It is difficult to define types of civil society organizations because of their diversity in their formality, size (in terms of membership), geographic scope of activities, rationale for formation/operation and linkages to the market/state/family (R Gray, Bebbington, & Collison, 2006, p. 323). Despite its complexity, the term of civil society has been enthusiastically used (Kaldor, Anheier, & Glasius, 2003) and its organisations continue to grow in size, vitality and importance (Anheier & Themudo, 2002, cited in Gray et al., 2006). Among civil society organizations, non-governmental organizations (NGOs) play a crucial role and have attracted diverse interests from researchers, practitioners and international organizations.

b. NON-GOVERNMENTAL ORGANIZATIONS (NGOs)

One of controversial issues related to NGOs is their definition and classification. Because it is difficult to define and classify given the multifaceted nature of NGOs and their diverse activities in various sectors, their relations to the state/market/public/international organisations, and their wide range of objectives. As defined by Korten (1990), NGOs are ‘movement-oriented entities, led by certain ideals, and have tended to focus attention on questions involving their missions and the proper means to achieve these missions’ (Shigetomi, 2002, p. 1), while Vakil (1997) described NGOs as “self-governing, private, not-for-profit organizations that are geared to improving the quality of life of disadvantaged people” (p. 2060).

Consistent with changing development paradigms, NGOs’ roles in society and relationships with both the state and market have been enormously changed over the last three decades. Some of the key roles performed by NGOs are social service providers, aid deliverers, partners of tri-sector partnerships, public watchdogs for government and business, public representatives, educators and mediators, and activists (Howell & Pearce, 2001; Jordan & Tuijl, 2006; Teegan, et al., 2004). Depending on their roles, NGOs chose various strategies to put their objectives into actions. One of the main areas of NGOs’ involvement is accountability of both public and private sectors.

1.2 ACCOUNTABILITY

Accountability is considered to be one of the main characteristics of democratic countries. After two decades of development, the term of ‘accountability’ has not yet achieved a generally agreed definition. The characteristics and classification of accountability are identified from different, but sometimes interdependent perspectives, logics and experiences. Some argue about its linguistic explanation and usages of those synonyms, such as accountability, responsibility and answerability (Mulgan, 2003), while others have opposing views on the nature of its meaning.

Accountability, at its basic level, means holding someone to account. It is the relationship between an account-holder/accountee and an accountant. An account-holder has a right to ask an accountant to be accountable. The accountant (Mulgan, 2003; van Peurseem, 1990) is obliged to act in the interest of the account-holder. However, researchers from different perspectives have different approaches to defining these actors. For instance, Bird (1973) from the positivist view suggests that

accountees are those who have entrusted resources to the steward, while Gray (1982) with a pluralistic approach defines accountees as those who have a right to be informed, even if they do not own the resources directly. These different attempts show that accountability is a subjective term defined by the interrelationship between two or more parties' rights and duties. It is also a continuous dynamic and dialogical process between these parties (Dillard, 2007).

The term has been widely investigated in the public administration literature with an emphasis on public sector accountability. However, with increased roles of inter- and quasi-governmental organizations and developmental donor organizations researchers have also started to address global accountability and roles and responsibilities of these organizations (Caporaso, 2003; Ebrahim & Weisband, 2007; Edwards, 2000). Similarly, during the last few decades a notion of corporate social responsibility has emerged as a result of the increased recognition of corporate responsibility to its stakeholders (Gray, Owen, & Adams, 1996; R Gray, 2006; Unerman & O'Dwyer, 2007). From a stakeholder approach, companies are accountable not only to their shareholders, but also to their stakeholders "who can affect, or are affected" by companies (Freeman, 1984 cited in Ebrahim & Weisband, 2007; Gray, et al., 1996). In this respect, companies are increasingly asked to consider their social and environmental issues along with their economic concerns.

As defined by Ebrahim et al. (2007), there are two sets of analytic assumptions in addressing accountability issues. The dominant assumption from a positivist or modernist view frames accountability based on the principal-agent perspective and suggests that "more information and transparency can reveal the 'truth' about behaviour, thus making corrective action or rectification possible" (p. 16). However, this technocratic accountability approach has been challenged by a structuralist or postmodernist view of accountability. Researchers of this perspective argue that accountability is "a social phenomenon, reflective of relationships of power in society" (Ebrahim & Weisband, 2007, p. 19). Depending on not only a sector, organization and structure, but also cultural and political background of countries, there are various types of accountabilities. These accountabilities struggle for "recognition and legitimacy" (Ebrahim & Weisband, 2007) and they need to be studied within the context of their specific issues and arenas (Dubnick & Justice, 2004). This suggests that accountability is not as straightforward as the mainstream researchers assume. It is complex because of its multifaceted nature influenced by power, national and organizational characteristics and culture, and related to its participants.

Much research has been conducted to determine the terms, classification, strategies and mechanisms to operationalize accountability in the public and private sectors and international arenas (Brown & Fraser, 2004; Caporaso, 2003; Dowdle, 2006; R Gray, Owen, & Mauders, 1987; Unerman & O'Dwyer, 2007). Meanwhile, some researchers are critical about the overuse of the term. They argue that accountability became a "chameleon-like" or "slippery" term that has not practised successfully in many parts of the world (Ebrahim & Weisband, 2007). Despite its criticism, accountability term has been widely used in various disciplines claiming to be helpful in promoting development and democracy.

In accountability literature, researchers often examine accountability issues in developed countries where societies as a whole are 'relatively' accountable. However, accountability issues confronting developing countries might be considerably

different than those of developed countries because of their political, economic and social circumstances and their cultural features (Dowdle, 2006; Hopper & Hoque, 2004). In terms of public accountability, three contexts developed by Amitai Etzioni (1975), greater responsibility and responsiveness; greater attention to the community; and greater commitment to “values” or “higher standards of morality” (p. 279), hardly exist in many developing countries. The states in many developing countries often have poor governance and institutions impeding accountability and responsiveness, a lack of political will to be accountable to the public, and have social problems like corruption and nepotism that restrain higher officials and public servants from performing with high morality (Hopper & Hoque, 2004).

Similarly, business also falls short of considering their stakeholders and performing in a socially and environmentally responsible way. The public in these countries, particularly in newly democratic countries in transition, are often unaware of democracy and their democratic rights, and lack a participatory mindset because of their culture and old societal regimes (Kravchenko, 2002). Given this kind of society, accountability, democracy and participation in these countries are encouraged by civil society organizations, namely by NGOs.

1.3 NGOs AND ACCOUNTABILITY

a. ACCOUNTABILITY PROMOTER

The importance of NGOs is acknowledged in various fields. They are seen as a potential actor in promoting democratic society, accountability and public participation. Particularly in developing countries, NGOs have been active to enhance democracy by increasing public awareness of their democratic rights, organising collective actions against socially or environmentally unfriendly business behaviours, and by engaging in dialogue with businesses, international organisations and the state. However, NGOs have acted differently depending on their circumstances and political and social environments of their existing countries.

They are increasingly seen as a partner of the state and market. The recent tri-sector development approach and the concept of social capital have enabled the tripartite cooperation of the state, market and civil society (Howell & Pearce, 2001; Pearce, 2000; Warner & Sullivan, 2004). However, some NGOs keep their status of being watchdogs of the state and businesses to ensure that they meet the general public interests and expectations (Pearce, 2000). In this respect, NGOs do not always support the existing practice in both public and private sectors (Howell & Pearce, 2001). This shows that a civil society arena still has a space for alternatives to the mainstream thinking and the dominant system.

Additionally, NGOs have a potential to promote democracy in both developed and developing countries. A growing number of researchers suggest that development and democracy have a positive correlation (Howell & Pearce, 2001) and thereby encouraging democracy in developing countries can lead to ‘humane’ development (Kothari, 1999). Some researchers in social and environmental accounting, and critical economics argue that NGOs can develop ‘counter-accounting’ (Spence, 2007) and silent/shadow accounting as an external social audit (Gray, et al., 1996), and introduce alternatives to mainstream economics in society (Soderbaum, 2008). Therefore, many researchers in development studies and other social sciences are enthusiastic about NGOs’ roles in promoting democracy and public participation. In this respect, civil society, as a persistent claimant for democracy, is increasingly seen

as an important player in society. International developmental organizations and donors have implemented various programmes and projects in developing countries to help to form civil society and NGOs. They try to introduce democracy through NGOs, support democratization processes and to strengthen capacity building of NGOs in these countries (Howell & Pearce, 2001; Pearce, 2000).

By encouraging democracy, NGOs often attempt to empower the public and their participation in decision-making processes. As participation is one of the key essentials for democracy and accountability, NGOs have consistently taken various actions to promote public participation that will genuinely empower the public. However, sometimes they themselves are an output of the public empowerment. NGOs have actively engaged in activities in raising public awareness and education about democracy, public rights and issues that affect public interests and rights, representing and giving voices for those who have not been heard, and organizing and mobilizing public participation (Howell & Pearce, 2001; Kapoor, 2001; Teegan, et al., 2004). In particular, NGOs have been one of the leading actors in encouraging participation in contested issues surrounding the extractive industry and environmental management.

b. NGO ACCOUNTABILITY

In the meantime, accountability of NGOs themselves has emerged along with the increased importance of NGOs in promoting accountability. As Jordan et al. (2006) suggested, NGO accountability issues have risen for three main reasons: a rapid growth in their numbers and size, attraction of more funds, and a stronger voice in shaping public policy (p. 4).

The ever increasing roles of civil society organisations at both national and international levels draw the SEA researchers' attention to investigate accounting and accountability practice of NGOs. In a similar vein to social researchers of the NGO sector, some accounting researchers have questioned accountability of NGOs, in particular, international advocacy NGOs (R Gray, et al., 2006; Unerman & O'Dwyer, 2006a, 2006b), their low credibility (Tilt, 1994) and motives for NGO accountability (O'Dwyer, 2007).

Along with accountability issues, NGOs have been also criticized for their lack of representation of the public and poors (Jordan & Tuijl, 2006), the mismanagement of resources, and the use of funds for personal gain (Ebrahim & Weisband, 2007). Despite their critics, NGOs have been consistently ranked as one of the most trusted sets of organisations, ranked above corporations, governments, churches, the media and other authorities in the Edelman's Barometer Trust Global Surveys over the last few years (Edelman, 2005). This demonstrates that the public perception of NGOs is positive and they are still seen as important civil society actors promoting democratic society.

2. RESEARCH METHOD

Given its interdisciplinary exploratory nature, qualitative research methods were employed in this study. The paper introduces a preliminary result of the researcher's PhD thesis which focuses on environmental management and mining issues as well. Therefore, 10 interviews of different stakeholders taken in 2009 and document analysis of the thesis were selected for the purpose of the paper. Qualitative methods, such as focused interviews, direct observation and document analysis, were used to

‘facilitate study of issues in depth and detail’ (Patton, 2002, p. 14) and to help the researcher to understand social phenomena in their complexities.

As the study attempts to understand the roles of NGOs in promoting accountability, interviews enabled the researcher to explore different stakeholders’ views on NGOs’ roles and potentials. Focused interviews were used as they provide both flexibility and active engagement between an interviewer and interviewees (Patton, 2002). In order to understand interviewees’ points of view and their meanings, direct observation supplemented interviews. It provided additional information and insight into the context of the study and relationships between different stakeholders to enhance understanding gained through interviews.

Document analysis was also employed in this study. This provided opportunities to compare the researcher’s understanding and data obtained through interviews with material recorded in documents and helped to ‘situate contemporary accounts within an historical context’ (May, 2001, p. 175). Documents related to research topics were collected from various sources and translated where necessary.

In terms of data analysis, qualitative content analysis was employed as it helped to critically analyse documents by considering the political, social and economic contexts of their production. This analysis also provided flexibility by allowing the researcher to consider ‘how meanings are constructed, developed and employed’ (May, 2001, p. 193).

3. COUNTRY BACKGROUND

Mongolia is a large landlocked country, covering about 1.5 million square kilometres, and bordering two of the world’s largest nations, Russia and China. It has a diversified range of geological areas including high mountains in the west, big steppes in the east and the Gobi desert in the southern part. Despite Mongolia’s large land size, it has a relatively small population of about 3 million people. It has had its own unique nomadic culture and shaman religion for many hundreds of years. This kind of background encourages people to live in harmony with nature and respect nature and its biodiversity.

The country is a newly democratic country. After 70 years of communism under the former USSR influence, Mongolia had a peaceful democratic revolution in the spring of 1990. For the last two decades, Mongolia has had various radical changes in its political, economic and social arenas to transition from the authoritarian communist regime with a centrally-planned economy towards a democracy with an open market economy. Some social aspects of the country have been positive — for example the well educated populace is reflected in a 98 percent literacy rate due to the former communist era and a well developed social capital (World Bank, 2007). By 2006, the national Human Development Index attained its highest level at 0.718 making Mongolia a medium Human Development nation with social indicators considerably more advanced than the average country with the same level of the GDP per capita (UNDP, 2007). Despite these positive aspects, the country has faced many challenges. To name a few, existence of old communist mentality, nepotism, corruption and power imbalance became main obstacles for the Mongolian young democracy.

In terms of the economic development, Mongolia is classified into the lesser developed country or developing country by its GDP per capita. The country has enjoyed the economic growth particularly after mid 2000s. According to the statistical

report, “the economic real growth for 2000 was 1.3 percent, for 2001-2004 annual average growth was 6.3 percent, and for 2005-2008 annual average growth was 8.7 percent” (National Statistic Office, 2009, p. 48). The GDP at purchasing power parity per capita has increased from \$1331 (UN Statistics Division, 2002) in 1996 to \$3200 in 2008 and resulted in a ranking of 163rd country out of 232 countries (CIA, 2009). Although GDP per capita has more than doubled in the last 12 years, the wealth distribution among the population is uneven and there is an increasing gap between rich and poor. Evidence of this is one third of Mongolians live in poverty (UNDP, 2007).

The main economic sector is the primary sector which includes animal husbandry and mining. Its vast variety of mineral resources makes it a mineral rich country. Mongolia’s mineral dependence is 24th highest in the world in 2000¹ as its mineral exports accounted for 25.45% of GDP (Ross, 2008, p. 195). This is due to its sizable deposits of copper, gold and various other minerals and its relatively narrow economic base. Since the mid 1990s, there has been a rapid increase in mineral exploration and mining as a result of favourable mineral and taxation laws aimed to attract foreign investment into the sector; world mineral demand and price; and potential mineral deposit discoveries (World Bank, 2006). Consequently, the role of the mining sector has increased dramatically in the Mongolian economy. At the same time, mining-induced environmental and social impacts are gradually becoming more evident in society and attract attention of civil society organizations, namely NGOs.

3.1 THE MONGOLIAN NGO SECTOR

The emergence of NGOs is closely related to the public demand for strengthening democracy and human rights, combating corruption, and addressing the near absence of an adequate state role in managing social and environmental issues. More recently, there are a growing number of NGOs and civil society organizations formed to address mining related issues, such as mining-induced social and environmental impacts and income distribution.

Despite its late emergence², starting from the post-communist period, the Mongolian civil society has grown drastically over the last two decades. The notion of the civil society or ‘citizens’ society’ in the Mongolian term is used in the Constitution of Mongolia. The Constitution (1992) states in the preamble that the supreme objective of Mongolia is to build ‘a humane, civil and democratic society in the country’ (The State Great Khural of Mongolia 1992, Article 1). Currently, the civil society comprises several broad groups of organisations, such as non-governmental organisations (NGOs), trade unions, chambers of commerce, saving and credit cooperatives, political parties, religious organisations, apartment owners’ unions, non-profit media, and informal self-help and leisure groups or community groups (UNDP, 2006, p. 1). Among them, the most influential actors are NGOs.

The democratic Constitution and the Law on Non-Governmental Organisations opened up a legitimate ground for NGOs. In particular, after the Law on NGOs (1997), the number of NGOs registered to the Ministry of Justice and Home Affairs has boomed and reached over 5000 (Open Society Forum, 2005). The law guarantees the

¹ - As the percentage of mineral exports to GDP increased to 33% in 2007 (MRPAM, 2008), mineral dependence might be higher than 2000.

² - Although there were trade union, women, youth and elders’ associations during the communist era, they were not voluntarily established and being separate from the state. They were parts of the dominant communist party.

right of Mongolian citizens to freely establish a NGO on the basis of their interests and opinions without any state or other parties' intervention (The State Great Khural of Mongolia, 1997).

However, much research suggests that the Mongolian NGO sector is still in its infancy. The sector faces numerous challenges related to ranging from their internal issues to their broader influences to society to empower the democratization process. The Civil Society Index 2005, developed by the International Civil Society Forum for Democracy, shows that the political, economic and social environments of Mongolia, as well as the NGOs' underdeveloped internal capacities and weak external cooperation are the major obstacles to NGOs' development (UNDP, 2006, p. 3).

Despite their relatively big numbers, only about one fifth of NGOs operates on a regular basis (Mongolian Open Society Institutions, 2003). This kind of passiveness results from both external and internal factors. There is a need for powerful umbrella organisations, more active intra- and cross-sector cooperation, and more effective engagement with grass-root organisations and communities (Open Society Forum, 2005; UNDP, 2006).

In terms of location, a study conducted by the Open Society Forum shows that almost 80 percent of the total registered NGOs are located in the capital city (Open Society Forum, 2005, p. 1) where Mongolian economic, political and social resources are centralized. The urbanization of NGOs jeopardizes their representation and accountability to the public, particularly to local people, especially if NGOs claim to be local NGOs.

Other problems confronting NGOs are the lack of internal institutional and human capacities and dependence on foreign funding. Most NGOs are not well structured and staffed which in turn weakens their strength and reputation in the society. The financial resources of NGOs are mainly comprised of foreign project funding rather than donations from the public³ and various organizations. According to a study on governance assessment, 90 percent of NGO activities are financed by project funding from international and foreign donors (Asian Development Bank, 2004, p. 68). The negative impact of this financing is that NGOs can become opportunistic, lose their initial motivation, can be in danger of losing their independence and their internal democracy, and develop an unsustainable way of operating by jumping from project to project.

The role of environmental NGOs has gradually increased in addressing environmental issues. Although there are quite big numbers of NGOs, the statistics show that the environmental NGOs account for only 2.66%⁴ of total numbers of NGOs (UNDP & the Government of Mongolia, 2006, p. 34). With the increased economic activities using natural resources and worsening global warming, the voices and environmental concerns advocated by environmental NGOs are becoming more frequent and influential.

In this respect, the Environmental Protection Law (1995) legitimized environmental NGOs as it guarantees the NGOs' role. This law has a separate article determining the role of NGOs in environmental protection. The law allows environmental NGOs to supervise and inspect the implementation of environmental protection legislation,

³ - Due to low income and social problems people are often not able to support NGOs financially. On the other hand, the philanthropic mindset is absent in the society.

⁴ - There are about 300 registered environmental NGOs by the beginning of 2008 (MNET).

demand the rectification of breaches, submit matters to authorised organisations for decision, organize ecological training and education, and develop proposals, recommendations and methodologies for environmental protection and restoration to submit to the relevant organisation for decision (The State Great Khural of Mongolia 1995, Article 32.1). The law also defines cooperation between the state and environmental NGOs by stating that the ministry in charge of the natural environment may cooperate with NGOs on a contractual basis to delegate special functions (Article 32.2). However, in the legislation NGOs are often seen as a public service provider that helps the government to perform its functions.

One of the emerging areas for NGOs is mining-induced environmental issues. Despite international and domestic enthusiasm for the mining sector, the potential adverse impacts on society and the natural environment have drawn NGOs' attention to this sector. They have protested bad mining practices in local regions and requested those mining companies to consider social and environmental issues raised by their mining activities. They have also put pressure both on the local and central government to address mining related issues, such as environmental degradation, mining contributions to local development, licence trading and rehabilitation. NGOs have played leading roles in raising societal awareness, organizing the public, protesting against bad mining practices and performing as public representatives in negotiation and mediation processes. Various NGOs have been established including local movements to protect peoples' rights to live in a safe and healthy environment and to advocate for socially and environmentally responsible mining.

3.2 RESPONSIBLE MINING INITIATIVE NGO

a. Background of the NGO

The NGO was initiated as an outcome of multistakeholder forums (facilitated by the donor). These forums defined the term and eight guiding principles of responsible mining and agreed by participant stakeholders to form a NGO to facilitate responsible mining into practice (Interview of a member of the donor NGO). The Responsible Mining Initiative (RMI) was registered as a NGO in December 2007 and started its activities since April 2008. It is a non-membership public NGO and basically operates in the capital city. It has 15 board members comprised of two parliament members from the main opposing political parties, a representative from the government environmental agency, a mining company representative, an environmental expert, two academicians and eight civil society organizations including three local environmental and social NGOs and five representatives of the trade union, the mining association and others (Responsible Mining Initiative, 2009).

The main goal of the NGO is to promote responsible mining with consideration for sustainable development. The NGO aims "to build a common framework of understanding of responsible mining in Mongolia among the public, government, industry, and investors; to provide open and transparent information; and to secure equal participation of the multi-stakeholders in these activities" (Responsible Mining Initiative, 2009). As defined in the declaration developed by the forum participants, responsible mining is "a comprehensive and transparent minerals activity respecting the rights of all stakeholders, especially of local people, environmentally friendly and free of human health impacts, embracing the best international practices and upholding rule of law whilst generating a sustainable stream of benefits for Mongolia" (Responsible Mining Initiative, 2006).

The NGO's main form of activity defined by the declaration is dialogue among multistakeholders. The Declaration provided the basis of the NGO and defined its goal, general guidance for the activities and cooperation principles for multistakeholders. It acknowledges the harmful impacts of the existing mining practice on the natural environment, society and economy and recognizes the need for developing responsible mining which could serve 'for the core interests of Mongolia's future' (RMI, 2006). It emphasizes the importance of multistakeholders engagement in promoting responsible mining by having equal rights and responsibilities to participate in order to make collective decisions based on mutual respect and information sharing. About 60 organizations have signed the declaration by agreeing to contribute to the development of responsible mining and follow its guiding principles (Interview of the NGO advisor).

Since April 2008, the RMI has had various activities including involvement in policy and standards development, knowledge building and information sharing, and development of success measurement among its members. The NGO successfully cooperated with members of parliament to include responsible mining related clauses in mining and environmental policy sections of the 2008-2012 Government of Mongolia Action Plan (Responsible Mining Initiative, 2009). To introduce responsible mining and its principles, the NGO co-organized 13 multistakeholders forums with the Asia Foundation. A series of panel discussions was also organized in the National University to build knowledge and share information for the public and other stakeholders (Interview of the NGO advisor). Under the facilitation of and financing by the Ministry of Environment and Tourism, the RMI participated in development of standards which aim to regulate mining land restoration (Responsible Mining Initiative, 2009). The NGO has also started to develop measurement criteria for mining companies to measure the compliance of the principles and then publicize them to the public (Responsible Mining Initiative, 2009).

b. The RMI as a cooperative NGO and a dialogue facilitator

The RMI is an interesting case for the Mongolian NGO sector as it illustrates a new phenomenon of the tri-sector cooperation. The NGO tries to cooperate with the government, mining companies and civil society organizations (Interview of the NGO advisor) that have previously seen each other as 'enemies'. For the last two decades, mining has been a controversial sector attracting various interests from its constituents. There are differing views and debates on mining development and its roles and contributions to Mongolia. The sector is seen as an income generator or a source of growth for some (World Bank, 2004; World Growth, 2008), while for others it is a destructive sector harming the natural environment and causing conflicts in society rather than providing benefits to Mongolians (Munkhbayar, 2005).

Most stakeholders, including mining companies, government organizations, international organizations, academia and civil society organizations have worked separately and have not listened to each other. However, through debates, stakeholders have started to recognize the importance of dialogue and cooperation to address mining issues and to let the mining sector become beneficial to Mongolia (Interview of a member of a NGO).

The forums facilitated by an international donor NGO provided an opportunity for mining constituents to come together and collectively discuss mining issues (Interview of a member of the donor NGO, 2009). Forum participants agreed that they need more regular and committed engagement to address issues that they all care

about. But as they have differing backgrounds, understanding and views, they realized that they need a place or organization to facilitate potential interaction and cooperation of different stakeholders (Interview of the NGO advisor).

For participants of the multistakeholder forums, a NGO is seen as a space for participation, dialogue and collective actions to promote the responsible mining initiative. As one interviewee says, participants of the forum chose to establish a non-political, non-governmental and non-profit organization which could enable stakeholders with contested interests to come together and talk and act with equal rights: no one is privileged over others; and all have equal rights and responsibilities to give their voices, to provide information and to participate in activities (Interview of the NGO advisor). Dialogue among stakeholders became the foundation of NGO activities to operationalize their goals.

Having an effective dialogue is a challenging task as Mongolians do not have much experience of having dialogue. A monologue type of meetings still exists where one talks and others listen without much interaction (Interview of a member of the donor NGO). This situation is resulted from the communist past, such as a teacher-centric education system and the uncritical state worship mentality in society. It also relates to a lack of public awareness of their right to express. On interviewee put it as “people are unaware of their expression right and afraid of talking, but now, they have started to understand their rights and more people talk in meetings” (Interview of a member of a NGO). Through more frequent public meetings and discussions facilitated by civil society organizations, international organizations and the media, people are gradually learning to talk, listen and debate with each other.

In this respect, the RMI became a space where mining constituents try to listen, talk, share their views and reach mutual understanding and decisions to promote responsible mining principles. However, the NGO finds it difficult to have dialogue among multistakeholders with different views, knowledge and information and with a lack of trust to each other. To overcome distrust among constituents, the NGO encourages information sharing among them started from its board member meetings. It is believed that stakeholders can have an effective dialogue and then cooperation by having equal information and understanding about mining (Interview of the NGO advisor).

The initiative of the RMI to have dialogue and cooperation with multistakeholders is a challenge. Despite difficulties to having dialogue, the cooperation among stakeholders needs greater understanding and willingness to work together. Having various representations in its board makes the RMI an interesting example of cooperation between mining constituents with contested interests. Each participants of the RMI NGO has their pros and cons.

The international donor NGO has played an important role in operationalizing the NGO as it has promoted and incubated the RMI. The donor NGO was a facilitator of the multistakeholder forums and played as a mediator between multistakeholders with contested views. It helped them to come together and interact with each other. Once the RMI NGO was established, the donor NGO started to finance the RMI's operational costs, such as rent and staff salaries. Although there are many advantages of having support and guidelines from the donor organization, it can also create some difficulties, such as donor's influences in RMI decision making processes and policies;

and its influence on the board structure⁵. As one interviewee said, the RMI is a “toy organization” which is heavily dependent on the donor organization and it does what the donor says (Interview of a member of a NGO).

For the state representatives of the RMI, there are two parliament members from opposing powerful parties. This can be seen as a good start as these MPs are informed by multistakeholder comments and views. Therefore, they may consider these views in relevant legislation and policies and make them more inclusive and practical. Similarly, a representative from a government agency can not only inform other members of the RM about government policies, but also include others comments into policies.

In terms of civil society organizations, the RMI has a good mixture of NGOs representing environmental, social and mining specialized NGOs and associations comprising more than half of board members. Two board members are the mining association and the mining youth association, while another three are more business related organizations. Nevertheless, the inclusiveness of more NGOs is an achievement as it illustrates that NGOs started to be seen as “legitimate” actors and their views and comments being heard by other mining constituents. The RMI provides a good arena for domestic NGOs to involve and influence decisions and actions of different stakeholders. This can be said as a step forward for some NGOs as the NGO sector has been asked to have more practical implications rather than being pure critics and activists (Interview of a member of a NGO). However, the NGO representation of the RMI can also be criticized on its representation. It is unclear whether NGOs on the board ideally represent the NGO sector or not as some more influential NGOs in their areas are not included in the RMI board. This might be because those NGOs do not want to compromise their independency with other stakeholders (namely, mining companies and the state) (Interview of the ORC NGO), or they are excluded from the RMI as it does not want to include critical voices which may be hard to cooperate with and come to a common language.

For a mining representative, a foreign mining company is on the board of the RMI. The company talks more about corporate responsibility and sustainable development compared with other mining companies. It has been one of the most publicized mining companies because of its deposits and its stability agreement with the government. The company discovered the world class copper/gold deposits in Southern Gobi and they have spent five years making a stability agreement with the government since 2004. The agreement has been one of the ‘hot’ topics of public debates and the company has organized various meetings, training and press conferences. Its involvement in the RMI may encourage increasing the awareness among mining companies by introducing best standards and practice of developed countries to Mongolia and thereby leading to social responsibility actions by mining. However, its engagement may also relate to increase their publicity and improve their image among Mongolians as there are many NGOs and citizens are suspicious about mining companies, particularly, about foreign companies.

⁵ - The donor influences in choosing who should or should not be in the board members. For example, as the researcher found that one domestic environmental NGO which is considered as a well-known activist NGO was resigned from the board member. This could be related to the scandal that the donor NGO called the domestic NGO as a terrorist and cancelled its cooperation after the domestic NGO declared that it was willing to take more serious protests against mining companies in some local regions to stop irresponsible mining actions.

3.3 ONGGI RIVER COMMUNITY NGO

a. Background of the NGO

“Onggi River Community” NGO (ORC NGO) is an example of a well-known local NGO which has taken various activities to address mining-induced environmental and social issues.

The main reason for the NGO formation was the dried up Onggi River and lake Ulaan which have supported lives in the central and southern regions of Mongolia. Since the government programme “Gold” was initiated in 1993, economic interests in gold mining have prevailed in the region and ended up with exploitation of gold deposits at river heads. The Onggi River flows for 430 km through mountains, steppes and the Gobi region and pours its water into the Lake Ulaan which has a particular influence on balancing the Mongolian Gobi climate. Lake Ulaan⁶, one of ten biggest lakes in Mongolia has dried up and most parts of the Onggi River that carry 600 - 2,500 litres of water every second to the Gobi have dried up. This situation has threatened the living environment of around 60,000 people not to mention their livestock and local wildlife. The region has mainly suffered from the gold mining companies that acquire exploitation licences to operate at the headwaters of the river and its intakes⁷, and illegal mining as well. Mining companies redirected and destroyed river paths for their economic use and most of them left their mining sites without carrying out proper environmental rehabilitation.

The NGO was founded in 2001 with the name of “Onggi River Community Movement”. The founders of the NGO were local people who live in eight different soums⁸ belonging to three different aimags⁹. They recognized the importance of the organized movement or organization to protect their vital community interests in a more influential way. As an interviewee said, local people have gradually understood ‘power in numbers’ and formed the NGO to protect their living environment in the absence of proper management by the government (Interview of the ORC NGO).

The NGO has organized a number of meetings with local authorities, local people and mining companies to raise awareness of the situation and to find possible solutions. In 2002 and 2003, it also appealed to all 76 members of the parliament, the Government of Mongolia and the President of Mongolia to take immediate actions to avert the ecological disaster in the region that seriously violates the constitutional rights¹⁰ of citizens. Despite their repeated requests to the state, no radical measures were taken (Munkhbayar, 2005). In 2003, they organized the “March of Protest” to attract the attention of Parliamentary election candidates, government ministries, the media and other NGOs to the environmental degradation. The NGO demanded a government response to their petition. About 3000 participants of the March including representatives from 8 soums, some MPs, NGOs and journalists walked 476km along the Onggi river (Munkhbayar, 2005).

⁶ - It is used to reach 40 km in diameter during its watery periods.

⁷ - According to the report of Independent the Review Group (created by the Ministry of Environment), Onggi river and the Lake Ulaan dried up due to the direct cause of the exploitation of gold deposits at the river heads (Independent Review Working Group, 2002).

⁸ - ‘Soum’, similar to a district, is an administrative unit after an aimag or province. Mongolia has more than 300 soums.

⁹ - ‘Aimag’ is the biggest administrative unit in Mongolia. It is similar to a province. There are 24 aimags.

¹⁰ - The article 16 states that Mongolian citizens shall have rights to live in healthy and safe environment and to be protected against environmental pollution and ecological imbalance

Despite its protests, the NGO has organized various activities to inform and educate local people. For example, it has organized meetings and training for people to inform them of their legal rights, environmental issues and ask their opinions. With cooperation of local teachers, the NGO has also prepared and published the environmental protection textbooks for different grades of primary and secondary schools. Now, there are some local schools with new curriculum subjects to increase awareness of their regional natural environment. Another main activity of the NGO is collecting donations to plant sea-buckthorns¹¹ by local people along the river. It is not only a method of protecting the river resource, but also helps locals to learn to protect their environment and to get benefit from their plantation by collecting and using sea-buckthorn berries.

The recent achievement of the NGO is the new law prohibiting exploration and mining at headwaters of rivers and protected zones of water reservoir and forested areas¹². With the cooperation of five other local environmental NGOs, the ORC NGO had played an important role to prepare the bill and lobby MPs to pass the law. Since 2006, they organized various activities, such as organizing local meetings, lobbying and sending letters from 6000 local people to MPs, collecting supportive signatures in the city, cooperating with other environmental NGOs to organize protests near the parliament building, and declaring a hunger strike in front of the parliament building to require MPs to pass the law. Finally, the law was passed in July 2009. At the moment, the NGOs are working on organizing the implementation process of the law in their local regions (River Movements, 2009).

b. The “Onggi River Community” as a challenger NGO

Since its formation, the ORC was a challenger NGO. After the “Gold” programme, the gold mining has boomed in local regions without proper environmental and social concerns of the government. Mining has developed “following its flow” with the poor compliance with legislation and environmentally unfriendly operations (Interview of an impact assessment specialist). Unregulated mining has caused serious environmental degradation and threats to living environment of nomads. The ORC case illustrates how the annoyed local people started to be organized and tried to protect their rights in absence of both public and private sector accountabilities.

Poor governance is the one of the main obstacles for the public sector accountability. As Mongolia has not had experience of the large-scale mining, the country faces with challenges to understand mining and its potential impacts, and to develop legislative and regulatory frameworks to ensure mining benefits to Mongolians while preventing from its negative impacts (Interview of the NGO advisor). However, the existing institutions and public officials are not performing in the public interests, particularly in mining-induced environmental issues. One interviewee said: “our system is leveraging officials to make symbolic decisions in favour of their interests given high conflicts of interest in the public sector” (Interview of Green Movement NGO). When it comes to responsibility, no one (local administrative officers, inspectors and environmental officers) is willing to take responsibility “by pushing issues to each

¹¹ - Sea-buckthorns are planted for soil and water conservation purposes. They are tolerant of salt in the air and soil and typically occur in dry and sandy areas (Wikipedia).

¹² - Mongolia is a landlocked country with scarce water and forestry resources. Forestry counts for only 7% (Dorjgotov & Purevsuren, 2006). As the country is in one of the arid and semi-arid regions, there is greater risk of water scarcity (UN, 2007, p. 4).

other, escaping from them and by silencing the issues” (Interview of Anggir Nuden Munduuhei NGO).

Moreover, a close linkage between business and politics has reduced quality of the public sector and damaged accountability. On the one hand, the public sector is politicized. It is in shortage of merit-based appointments and there are frequent changes of both higher and middle level officials after elections, which is ‘very counter-productive’ (Interview of an international organization officer). The closeness between business and politics results in the increased corruption and conflicts of interest in the public sector. Businessman politicians’ “interest in politics is not necessarily in the best interest of all Mongolians, it is their best interest” (Interview of an international organization officer). There is no political will to improve the public sector accountability. As one interview put it “individuals’ attention to law enforcement is not welcomed, or if they do first stage, maybe the police in the next stage, and judges are not sympathetic” (Interview of an international organization advisor).

There is no need to mention about responsibility of mining companies when the country has poor governance and endemic corruption. Companies have used out-dated technologies harmful for the natural environment, poorly complied with legislation and have not properly rehabilitated after mining. Local people are often not aware of mining and recognize dangers after impacts have already occurred. They are powerless in front of the government, mining companies and big foreign interests (Interview of the ORC NGO leader). The natural environment became a ‘victim of the political repression’ (Interview of the Green Movement NGO). There is no single case in the court that punished guilty parties for ecological responsibility (Interview of an impact assessment specialist).

In this accountability absence, challenger local NGOs play important roles to raise social awareness about mining-induced issues and put pressure on both mining companies and the government. One example is the ORC NGO. They have demonstrated bad mining practices, organized protesting activities, criticized the state, required to take immediate actions and informed the press and local people about the situations. Some call them a ‘noise maker without scientific evidence’ (Interview of an international organization officer). However, many agree that the NGO is an influential actor in raising awareness at all levels. After its constant protests and media coverage since 2002, people are gradually becoming aware about an ‘evil’ side of mining (Interview of the ORC NGO) and the government started to understand the importance of environmental management. Both the government and public attentions to mining and its responsibility have gradually increased.

Through its development, the NGO is learning and recognizing how to have influences. With the recognition of the importance of cooperation, the ORC NGO has tried to work with an international donor organization, the government and with other local NGOs. The NGO was a member NGO of the Mongolian Nature Protection Civil Movement Coalition (MNPCMC) which was incubated and supported by an international donor organization. The donor NGO is also one of the founder NGOs and a funding organization of the RMI NGO. However, after a year of half cooperation the coalition disbanded (Interview of a member of the donor NGO). The ORC and some other local NGOs refused to cooperate because they recognized limitations of the donor incubated coalition. As the leader of the ORC said, ‘the cooperation was limited by donor’s preference’ and some NGOs understood that

'donors' main goal is to let NGOs be silent and acquiescent' by requiring to not criticize the government policies and not protest against mining companies when they made contract with NGOs (Interview of the ORC NGO).

Besides the cooperation with the donor organization, the leader of the ORC NGO was elected as a chairman of the board members of the Citizens' Representative Committee¹³ during the first NGO conference held in November 2008. The Committee cooperates with the Ministry of Environment and Tourism and plays as a mediator between NGOs and the ministry. However, after a half year of holding position, the leader of the ORC NGO started to become critical about the committee's penetration to the Ministry. As he put it, although there are many good sides of having the Committee cooperating with the government, the main disadvantage of the cooperation is violation of NGOs' fundamental characteristic – hold the state be accountable. As the Committee made a contract of cooperation, located in the Ministerial building and funded by it, NGOs' rights of free expression and independency of being a 'non-governmental organization' status is at stake (Interview of the ORC NGO). Therefore, the ORC NGO leader handed his position to another NGO leader and stayed as a board member who is in charge of water issues at the Committee.

More recently, the ORC NGO has cooperated with some local environmental NGOs and formed a new NGO coalition called "United River Movements" NGO. The coalition NGO consists of six local environmental movements from five different regions of Mongolia where mining has developed significantly. They all aim to protect their rivers and lakes from environmentally and socially harmful mining practices including both legal and illegal mining. Through their different activities, mainly protests, in their local areas, these NGOs realized the weakness of "solo" players at the local level (Interview of the ORC NGO leader). NGOs found it has no impact to protest and stop mining operations at the local level as mining licences had already been issued and regulations and decisions were already made in the capital city (Interview of Salkhin Sandag NGO). As one local NGO interviewee said, it is useless to fight in local regions where there is a vertical administration and decision-making system which is heavily centralized and dependent on the central government (Interview of Anggir Nuden Munduuhei NGO). Therefore, local NGOs have realized a need for cooperation to become more influential. They decided to have an office in the capital city to make their influence at a decision-making level. In early 2009, these six NGOs formed a new NGO called "United River Movements" NGO.

The interesting feature of the URM NGO is its management principles. All member NGOs have equal rights in the decision-making processes and they have equal opportunities to manage the NGO in turn. Leaders of all NGOs meet once a month in the city and select one as a head of the URM NGO (Interview of the URM NGO member). The selected leader introduces his/her plan for the month whilst ensuring his/her plan is consistent with previous months' activities. At the end of his/her managing period, the head of the month reports to other about his/her achievements, financial situation (monthly member fees, other donation or project money and costs) and things to do in the next month (Interview of the URM NGO member). Two permanent administrative staff is in charge of administrative activities and help the

¹³ - The formation of the committee was an important step for environmental NGOs to implement environmental protection projects and, more importantly, to involve in environmental policy making processes at the ministerial committee level.

monthly head of the NGO. However, among other NGOs the ORC NGO plays an inspiring and “informal” leading role as it has more experiences and knowledge to organize various activities. Despite their united activities in the city, each NGO still enjoys their individual freedom to operate in their regions (Interview of the URM NGO member).

3.4 POTENTIALS OF NGOs

In the first case, the RMI NGO is an interesting case where multistakeholders with contested interests come together and try to address an issue – responsible mining development - collectively. The RMI chose a cooperative strategy to address mining induced issues. This case illustrates the process of learning to have a dialogue among stakeholders with conflicting views. Although this NGO is a quasi-formal or “privileged” NGO and seen by some local NGOs as not a “domestic”¹⁴ NGO, its process of development of cooperation is an insightful experience as the Mongolian society lacks cooperation at all levels.

The NGO itself is seen as a space for dialogue among multistakeholders. Perhaps, multistakeholders chose to form a NGO as this type of organization is more flexible in its organizational structure, less bureaucratic, able to have more direct involvement in practice, and it is a politically ‘neutral’ organization compared with government institutions and private sector organizations. These advantages might enable different stakeholders to engage in and listen to each other. Moreover, being an NGO provides an arena where everyone can come to talk in a less formal manner which may help all participants to behave more honestly and therefore helps to build trust.

The RMI NGO case shows their challenges and learning processes. The NGO takes initiatives and develops skills which are new and useful not only for the RMI NGO, but also for the country. These can be illustrated as follows:

- The NGO promotes various stakeholders, including public and private sectors, NGOs and academia, to learn to cooperate with each other. The skill of cooperation is lacking at all social levels of Mongolia. This may relate to the centuries of self-sufficient nomadic lives and a lack of trust to each other from the communist regime when people were afraid of expressing their views and being heard by others, namely by the state (Interview of a member of an international donor organization).
- Members learn to have a dialogue in an environment where everyone is claimed to have equal rights and responsibilities to talk and listen to each other without privileging anyone (Responsible Mining Initiative, 2006).
- They learn to participate by respecting each other. This is important for a sector like mining that has various constituents with controversial views.
- The NGO uses democracy in action by participating equally and being accountable for their collective and individual decisions and actions (Responsible Mining Initiative, 2006).
- It is also making sustainable development more realistic and looking at practical implications. The term responsible mining itself directly relates to sustainable development as it is claimed to be environmentally and socially sound, but also economically beneficial mining that could contribute to Mongolian wellbeing.

¹⁴ - It can be seen as an incubated NGO by an international donor NGO. The donor NGO acts as the RMI NGO’s supervisory board member.

In contrast, the case of the ORC NGO and its coalition with other local NGOs illustrates a development path of a local environmental NGO. This is not only a process of the organizational growth, but also a gradual progress of democracy in the country supported by civil society organizations.

The ORG NGO case illustrates how local NGOs are gradually learning-by-doing through their experiences and how NGOs change their strategies from being local activists to becoming a united coalition which keep their activism on the one hand and perform as a more legitimate domestic NGO influencing and lobbying decision-makers, on the other hand. The NGO has taken activities such as informing and educating the public, playing an advisory role for other NGOs and governmental policies and decisions, being involved in policy debates, cooperating with other NGOs and research institutions, and taking environmental protection activities.

As it realized power in numbers, the ORC NGO has cooperated with various NGOs, and international and government organizations. However, it is still learning to cooperate with others to take collaborative actions. There are some challenges in cooperation. Most interviewees suggested that main factors for poor cooperation among NGOs are their conflicts of interest, ambiguity, a lack of skills and knowledge to cooperate, weak institutional and human capacities, and a lack of trust to each other.

One of the main inputs of the ORC NGO to the society is that it tries to address accountability issues at both societal and organizational levels. From the start of its operation, the ORC NGO has asked mining companies and the state to be responsible for their actions and decisions. Therefore, it has promoted the notion of social accountability amongst the public, especially in local regions. As locals are often unaware of their rights and responsibility and unable to express their voices, the NGO case shows that NGOs challenge the old passive recipient mentality or worship the state mentality of local people and let them realize their rights to hold the state accountable. However, this still has a long way to go.

From the administrative principles of the “United River Movements” NGO, these NGOs try to develop organizational inner democracy and accountability for themselves. With their differing views, financial constraints, experiences and skills of performing administrative functions, the coalition confronts the various challenges and it is learning by doing. Therefore, it can be said that the ORC and the URM NGOs attempt to promote democracy by raising awareness of all mining constituents, encouraging participation and inclusiveness of the public, asking to improve accountability and trying to be democratic at their organizational level.

CONCLUDING COMMENTS

Various studies have been done in the accountability literature to address public and private sector accountability, their terms, characteristics and implications for practice (Dowdle, 2006; Hall, Bowen, Ferris, Royle, & Itzigibbons, 2007; Mulgan, 2003). Accountability application is relatively good in countries where there is a good rule of law, effective institutions and well-developed human capacity.

However, accountability is a challenging issue in many developing countries. These countries often suffer from corrupted states, close linkages between the state and business, poor rule of law, and weak institutional and human capacity. Additionally, there are lacking accountability mindsets among the state, business and the public. The public, as an accountholder, does not have either the voice to be heard or to

express their opinions. Therefore, it is hard to believe that the state will ensure public accountability by itself in these countries (Mulgan, 2003).

In this respect, the role of civil society organisations, in particular NGOs, is important as they are often formed to address social problems and to protect human rights. Despite criticism of NGOs' accountability, their representation and their poor capacities, NGOs have taken various actions to improve accountability of both public and private sectors.

The two Mongolian NGO cases examined in this paper suggest that various types of NGOs have emerged in the country to address the mining-induced environmental and social issues that have arisen in recent years. The Onggi River NGO chose to be an activist and be independent from the state and business, while the RMI NGO preferred to cooperate with both the state and business. Both NGOs aim to change the current irresponsible mining practice and poor governance by addressing mining and environmental issues. However, they chose different paths to achieve their goals. The ORC NGO chose to be a challenger, while the RMI NGO preferred to cooperate with the state and business. Both have their pros and cons.

The challenger NGO has made 'noises' in society and thereby draws social attention to the issues which either are not known or were not able to be known previously due to a lack of access to information, secrecy and distance from the areas where issues exist. The ORC NGO has also put pressure on both the state and mining companies. This is important as the NGO let the public realize that the public need to speak up and be heard. In this sense, the Onggi River" NGO creates a basic accountability in society which is lacking because of the state worship mentality caused by feudalist and communist periods.

However, being an activist can push others away from the NGO. The state and mining companies are careful when dealing with the Onggi River NGO as for them the NGO is a critic and protestor. Although the general public supports its activities, some people and organisations, with their state worship view, see NGOs as a trouble-maker. This attitude is expressed in a Mongolian proverb "a mouse has no need to commit suicide for matters of state".

On the contrary, the RMI NGO engages with multistakeholders, including both the state and mining companies. Through its cooperation, the NGO tries to make a dialogue among mining constituents with conflicting interests, to come to a common language and to gradually build trust and an accountability mindset among multistakeholders. However, with cooperation the NGO might be faced with the challenge of balancing its independence and the inevitable compromises of cooperation.

In going by two different ways in the same direction, each NGO promotes social learning and democratization processes in the country. They both try to improve accountability in the public and private sectors.

REFERENCE:

- Anheier, H., & Themudo, N. (Eds.). (2002). *Organisational Forms of Global Civil Society: Implications of Going Global*. Oxford: Oxford University Press.
- Asian Development Bank (2004). *Governance: Progress and Challenges in Mongolia*.
- Bird, L. (1973). *Accountability: Standards in Financial Reporting*. London: Accountancy Age Books, Haymarket Publishing Ltd.
- Brown, J., & Fraser, M. (2004). Social and Environmental Accounting: How are you approaching it? Part 2: The Stakeholder-Accountability and Critical-Theory Approaches. *Chartered Accountants Journal, September*(2004), 24-28.
- Caporaso, A. (2003). Democracy, Accountability and Rights in Supranational Governance. In Kahler.M & Lake.D.A (Eds.), *Governance in a Global Economy: Political Authority in Transition*. Princeton: Princeton University Press.
- CIA (2009). CIA World Factbook Retrieved 10.12.2009, from <https://www.cia.gov/library/publications/the-world-factbook/fields/2004.html>
- Dillard, J. (2007). Legitimizing the Social Accounting Project: An Ethic of Accountability. In J. Unerman, J. Bebbington & B. O'Dwyer (Eds.), *Sustainability Accounting and Accountability*. London: Routledge.
- Dorjgotov, D., & Purevsuren, C. (2006). *Ecological Situation in Dry Land of Mongolia*. Paper presented at the Dry Land Processes Studies Workshop.
- Dowdle, M. W. (Ed.). (2006). *Public Accountability: Designs, Dilemmas and Experiences*. Cambridge: Cambridge University Press.
- Dubnick, M. J., & Justice, J. B. (2004). *Accounting for Accountability*. Paper presented at the The Annual Meeting of the American Political Science Association.
- Ebrahim, A., & Weisband, E. (Eds.). (2007). *Global Accountabilities : Participation, Pluralism, and Public Ethics*. Cambridge: Cambridge University Press.
- Edelman, R. (2005). *Edelman Trust Barometer 2005: The Sixth Global Opinion Leaders Study*. Brussels: Edelman Public Relations.
- Edwards, M. (2000). *NGO Rights and Responsibilities: A New Deal for Global Governance*. London: Foreign Policy Centre/NCVO.
- Etzioni, A. (1975). Alternative Conceptions of Accountability: The Example of Health Administration. *Public Administration Review, May-June*, 279-285.
- Gray, Owen, D., & Adams, C. (1996). *Accounting and Accountability*: Prentice Hall Europe.
- Gray, R. (1982). Accounting, Financial Reporting and Not-For-Profit Organizations. *British Accounting Review, 2*.
- Gray, R. (2006). Social, Environmental and Sustainability Reporting and Organisational Value Creation?: Whose Value? Whose Creation? *Accounting, Auditing & Accountability Journal, 19*(6), 793-819.
- Gray, R., Bebbington, J., & Collison, D. (2006). NGOs, Civil Society and Accountability: Making the People Accountable to Capital. *Accounting, Auditing & Accountability Journal, 19*(3), 319-348.
- Gray, R., Owen, D., & Mauders, K. (1987). *Corporate Social Responsibility*. New Jersey: Prentice Hall.
- Habermas, I. (1989). *Between Facts and Norms: Contributions to a Discourse Theory of Law and Democracy* (W. Rehg, Trans.). Cambridge, MA: MIT Press.
- Hall, A. T., Bowen, M. G., Ferris, G. R., Royle, M. T., & Itzgibbons, D. (2007). The Accountability Lens: A New Way to View Management Issues *Business Horizons, 50*(5), 405-413

- Hopper, T., & Hoque, Z. (Eds.). (2004). *Accounting and Accountability in Emerging and Transition Economies*. Oxford: Elsevier Ltd.
- Howell, J., & Pearce, J. (2001). *Civil Society and Development: A Critical Exploration*. Colorado: Lynne Rienner Publishers, Inc.
- Independent Review Working Group (2002). *The Final Report of the Independent Review Working Group*. Ulaanbaatar.
- Jordan, L., & Tuijl, P. v. (Eds.). (2006). *NGO Accountability: Politics, Principles and Innovations*. London: Earthscan.
- Kaldor, M., Anheier, H. K., & Glasius, M. (Eds.). (2003). *Global Civil Society 2003/ Centre for Civil Society and the Centre for the Study of Global Governance, LSE*. Oxford: Oxford University Press
- Kapoor, I. (2001). Towards Participatory Environmental Management. *Journal of Environmental Management*, 63, 269-279.
- Korten, D. C. (1990). *Getting to the 21st Century Voluntary Action and the Global Agenda*. Kansas City, MO: Bookmark Press.
- Kothari, M. (Ed.). (1999). *Development and Social Action*. Oxford: Oxfam.
- Kravchenko, S. (2002). New Laws on Public Participation in the Newly Independent States. In D. N. Zillman, A. R. Lucas & G. R. Pring (Eds.), *Human Rights in Natural Resource Development: Public Participation in the Sustainable Development of Mining and Energy Resources*. Oxford: Oxford University Press
- May, T. (2001). *Social Research: Issues, Methods and Process*. Buckingham: Open University Press.
- Mongolian Open Society Institutions (2003). *Directory of Mongolian NGOs*. Ulaanbaatar.
- Mulgan, R. (2003). *Holding Power to Account: Accountability in Modern Democracies* (1st ed.). New York: Palgrave Macmillan.
- Munkhbayar, T. (2005). Safe Environment is a Fundamental Right That Never Can Be Given Up Retrieved 30.06.2008, from <http://www.onggiriver.org/index.php?mid=2>
- National Statistic Office (2009). *2008 Statistical Yearbook*. Ulaanbaatar, Mongolia.
- O'Dwyer, B. (2007). The Nature of NGO Accountability: Motives, Mechanisms and Practice. In J. Unerman, J. Bebbington & B. O'Dwyer (Eds.), *Sustainability Accounting and Accountability*. New York: Routledge.
- Olson, M. (1971). *The Logic of Collective Action: Public Goods and the Theory of Groups*. Cambridge, MA: Harvard University Press.
- Open Society Forum (2005). *NGOs in Mongolia: Survey Report*. Ulaanbaatar.
- Patton, M. Q. (2002). *Qualitative Research and Evaluation Methods* (3 ed.). Thousand Oaks, California: Sage Publications, Inc.
- Pearce, J. (2000). *Development, NGOs, and Civil Society*. Oxford: Oxfam Publication.
- Perez-Diaz, V. M. (1998). The Public Sphere and a European Civil Society. In J. C. Alexander (Ed.), *Real Civil Societies: Dilemmas of Institutionalization* (pp. 211–238). London: Sage Publications.
- Pharr, S. J. (2003). Preface. In F. J. Schwartz & S. J. Pharr (Eds.), *The State of Civil Society in Japan* (pp. xiii–xviii). Cambridge: Cambridge University Press.
- Declaration of Responsible Mining (2006).
- Responsible Mining Initiative (2009). *Responsible Mining Initiative for Sustainable Development*. Ulaanbaatar.
- River Movements (2009). Update on the River Movements: River Movements, Declaration of Responsible Mining (2006).

- Robertson, D. (Ed.) (1986). London: Penguin.
- Ross, M. (2008). Mineral Wealth, Conflict, and Equitable Development. In M. Walton, A. J. Bebbington, A. A. Dani & A. D. Haan (Eds.), *Institutional Pathways to Equity: Addressing Inequality Traps (New Frontiers of Social Policy)*. Washington DC: World Bank Publications
- Salamon, L. M. (1994). The Rise of the Nonprofit Sector: A Global 'Associational Revolution'. *Foreign Affairs*, 73(4), 109-122.
- Seligman, A. (1992). *The Idea of Civil Society*. New York: Macmillan.
- Shigetomi, S. (Ed.). (2002). *The State and NGOs: Perspective from Asia* Singapore: Institute of Southeast Asian Studies.
- Skocpol, T. (2002). United States: From Membership to Advocacy. In R. Putnam (Ed.), *Democracies in Flux: The Evolution of Social Capital in Contemporary Society* (pp. 103–136). New York: Oxford University Press.
- Soderbaum, P. (2008). *Understanding Sustainability Economics: Towards Pluralism in Economics*. London: Earthscan.
- Spence, C. (2007). Social Accounting's Emancipatory Potential: A Gramscian Critique. *Critical Perspectives on Accounting*, doi:10.1016/j.cpa.2007.06.003.
- Teegan, H., Doh, J., & Vachani, S. (2004). The Importance of Nongovernmental Organizations (NGOs) in Global Governance and Values Creation: An Business Research Agenda. *Journal of International Business Studies*, 35(6), 463-483.
- The London School of Economics Centre for Civil Society (2004). What is Civil Society? Retrieved 25.07.2008, from http://www.lse.ac.uk/collections/CCS/what_is_civil_society.htm
- The Constitution Law of Mongolia(1992).
- The Constitution Law of Mongolia(1992).
- Environmental Protection Law of Mongolia(1995).
- Law on Non-Governmental Organizations (1997).
- Tilt, C. A. (1994). Influence of External Pressure Groups on Corporate Social Disclosure: Some Empirical Evidence. *Accounting, Auditing & Accountability Journal*, 7(4), 47-72.
- UN (2007). *Coping with Water Scarcity: Challenge of the Twenty-First Century*.
- UN Statistics Division (2002). GDP per capita (PPPs) Retrieved 24.01.2008, from http://unstats.un.org/unsd/cdb/cdb_years_on_top.asp?srID=29922&Ct1ID=&crID=496&yrID=1996%2C2006
- UNDP (2006). *State of Civil Society in Mongolia: Final Draft Country Report*. Ulaanbaatar.
- UNDP (2007). *Mongolian Human Development Report 2007: Employment and Poverty in Mongolia*.
- UNDP, & the Government of Mongolia (2006). *Democratic Governance Indicators: Assessing the State of Governance in Mongolia*. Ulaanbaatar.
- Unerman, J., & O'Dwyer, B. (2006a). On James Bond and the Importance of NGO Accountability. *Accounting, Auditing & Accountability Journal*, 19(3), 305-318.
- Unerman, J., & O'Dwyer, B. (2006b). Theorising Accountability for NGO Advocacy. *Accounting, Auditing & Accountability Journal*, 19(3), 349-376.
- Unerman, J., & O'Dwyer, B. (2007). The Business Case for Regulation of Corporate Social Responsibility and Accountability. *Accounting Forum*, 31, 332-353.
- Vakil, A. (1997). Confronting the Classification Problem: Towards a Taxonomy of NGOs. *World Development*, 25(12), 2057-2070.

- van Peurseem, K. A. (1990). *A Definition for Public Sector Accountability*. Palmerston North: Massey University.
- Warner, M., & Sullivan, R. (Eds.). (2004). *Putting Partnership to Work: Strategic Alliances for Development between Government, the private Sector and Civil Society*: Greenleaf Publications.
- Wikipedia. Sea-buckthorn Retrieved 31.12.2009, from <http://en.wikipedia.org/wiki/Sea-buckthorn>
- World Bank (2004). *Mongolia: Mining Sector Sources of Growth Study*.
- World Bank (2006). *A Review of Environmental and Social Impacts in the Mining Sector*. Washington.
- World Bank (2007). *Mongolia: Sources of Growth*. Washington, DC.
- World Growth (2008). *Averting the Resource Curse: Path to Prosperity, Project Mongolia*. Arington.
- Worms, J.-P. (2002). France: Old and New Civic and Social Ties in France. In R. Putnam (Ed.), *Democracies in Flux: The Evolution of Social Capital in Contemporary Society* (pp. 137–188). New York: Oxford University Press.