

The State of the Internet and Digital Rights in Mongolia (2019–2025)

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1. General Information

1.1. Geographical Location

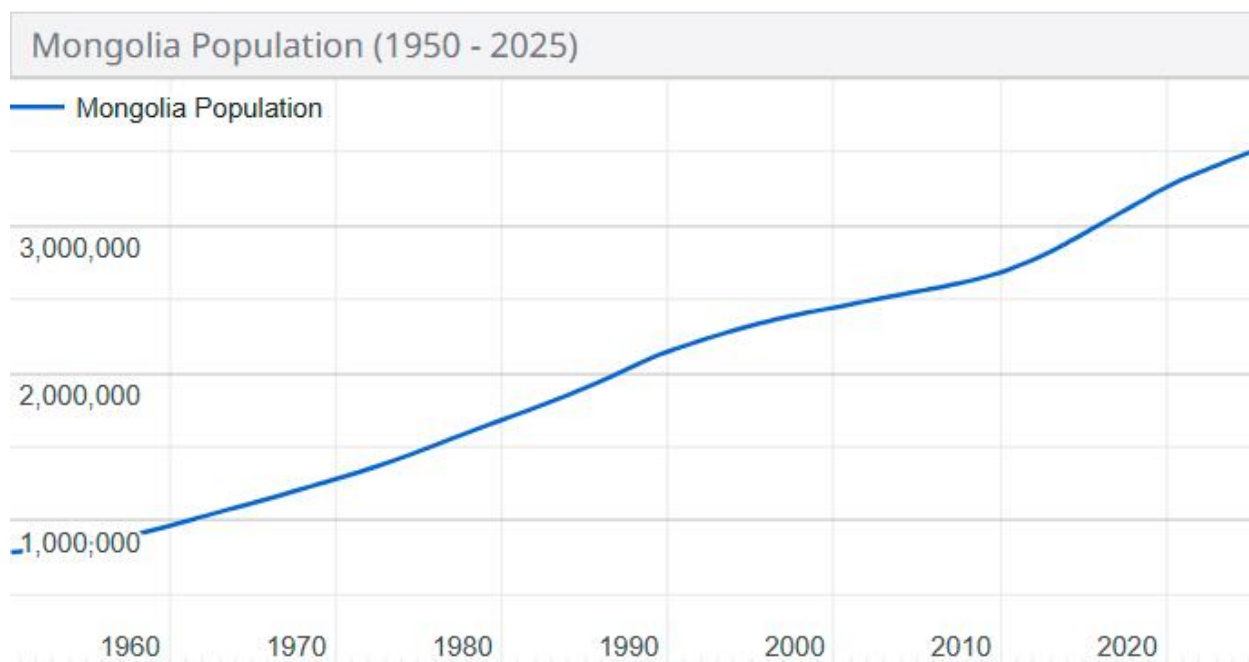
Mongolia is a landlocked country in East Asia. It borders Russia to the north and China to the south, east, and west. The country occupies a vast territory characterized predominantly by steppe landscapes, as well as the Gobi Desert in the south and mountainous areas in the north and west. Its geographical position between two major powers significantly influences its foreign policy and economic ties, as well as the development of infrastructure, including telecommunications.

1.2. Population

Mongolia's population is relatively small given the country's large area, resulting in low population density. The ethnic composition is predominantly homogeneous – more than 95% are Mongols (Khalkha Mongols and other groups). A significant portion of the population leads a nomadic or semi-nomadic lifestyle, although urbanization is actively continuing, and about half of the residents live in the capital Ulaanbaatar and other cities.

The demographic situation in recent years shows moderate population growth driven by both natural increase and some reduction in emigration. Young people make up a significant share of the population, creating potential for development but also challenges for the labor market and social sphere.

Chart 1: Population dynamics of Mongolia (1950–2025)

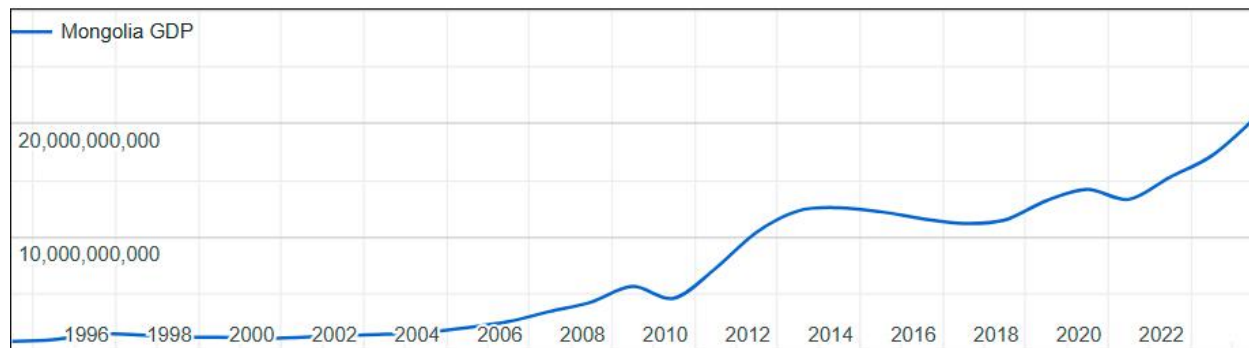


Source: *worldometers.info*

1.3. Gross Domestic Product (GDP)

Mongolia's economy is heavily dependent on mining (coal, copper, gold) and agriculture. In recent years, GDP growth rates have fluctuated due to global commodity prices and the volume of foreign investment. The government seeks to diversify the economy by developing sectors such as tourism and information technology, but dependence on the mining industry remains high.

The COVID-19 pandemic had a negative impact on the economy, causing a decline in 2020; however, subsequent years have been characterized by gradual recovery. Inflationary pressure and public debt remain relevant problems for the country's economic development.

Chart 2: Dynamics of Mongolia's nominal GDP (1993–2023)**Mongolia GDP (Nominal, \$USD) 1993-2023**

Source: *worldometers.info*

1.4. Main Economic Characteristics

Mongolia's economy has shown signs of recovery and growth after the COVID-19-induced downturn, mainly due to increased exports of coal and other minerals. However, the country faces structural problems, including high dependence on the raw materials sector, making it vulnerable to fluctuations in global prices. Infrastructure constraints, especially in transport, also hinder economic development.

Key economic sectors are mining (coal, copper, gold), agriculture (mainly livestock), and to a lesser extent light industry and tourism. The government declares intentions to diversify the economy, support small and medium-sized businesses, and attract investment in non-raw-material sectors, including information and communication technologies (ICT). Nevertheless, high inflation, a significant level of public debt, and the need to improve the business climate remain serious challenges.

1.5. General Political Situation

Mongolia is a parliamentary republic. The political system is multi-party, but two main parties dominate: the Mongolian People's Party (MPP) and the Democratic Party (DP). The head of state is the president, elected by popular vote, but the main executive power belongs to the government headed by the prime minister, who is appointed by parliament (the Great State Khural).

The Great State Khural is a unicameral parliament consisting of 76 deputies elected for four years. The country's political life is periodically accompanied by intra-party struggles and government changes, which can affect the stability of the political course. Despite this, Mongolia is considered one of the democracies in the region, although problems with corruption and judicial independence are noted. Administratively, the country is divided into 21 aimags (provinces) and the capital Ulaanbaatar, which has special status. Local self-government is exercised at the level of aimags, soums (districts), and bags (smallest administrative units).

In recent years, the political agenda has included issues of constitutional reform, anti-corruption efforts, strengthening the rule of law, and socio-economic development. Mongolia's foreign policy is built on the "third neighbor" principle, seeking to develop balanced relations not only with Russia and China but also with other countries of the world, including the United States, Japan, South Korea, and European Union countries.

2. Internet

2.1. National Domain

The country-code top-level domain (ccTLD) for Mongolia is .mn. The domain is administered by Datacom Co., Ltd. Registration of domain names in the .mn zone is open to both residents and non-residents of Mongolia, individuals and legal entities. There are certain registration rules concerning the prohibition of names that violate Mongolian legislation, generally accepted moral standards, or the rights of third parties.

The history of the .mn domain began in 1995 when it was delegated to Datacom. Initially, the development of the domain zone proceeded at a moderate pace; however, with the growth of internet penetration in the country and increased awareness of the importance of online presence, the number of registered domains began to increase. Datacom also offers second-level domain registration in the Mongolian language (IDN), which contributes to internet accessibility for Mongolian-speaking users. Efforts to popularize the national domain and create convenient services for its use continue.

2.2. Number of Users

The number of internet users in Mongolia is steadily growing, driven by infrastructure expansion, lower access costs, and greater availability of mobile devices. According to various sources, internet penetration has increased significantly in recent years.

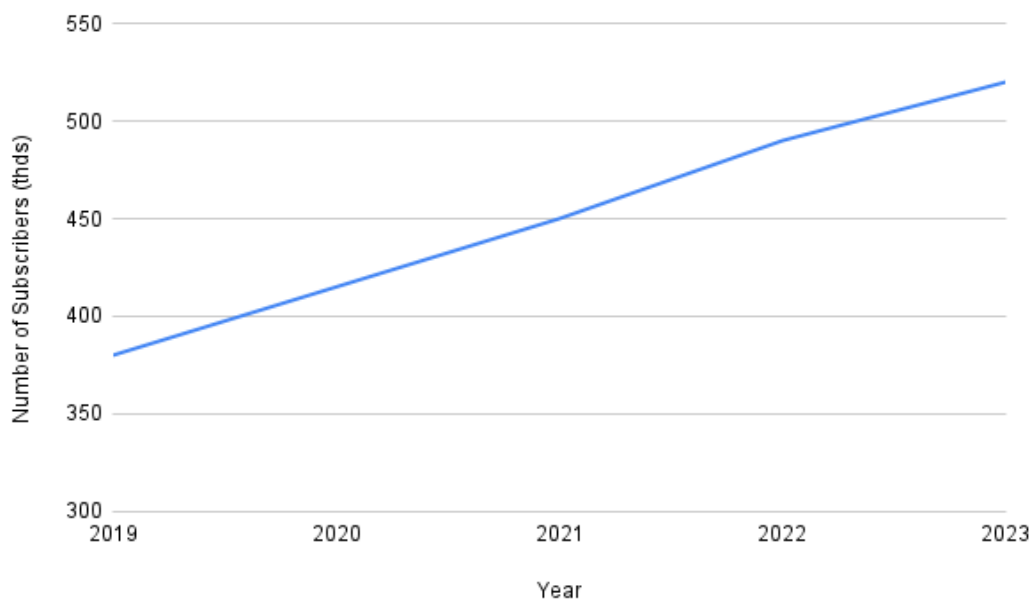
- According to InternetWorldStats (December 2021), the number of internet users in Mongolia was approximately 2.5 million people, corresponding to a penetration rate of 74.6%.
- The DataReportal report for 2023 indicates that at the beginning of the year Mongolia had 2.28 million internet users, with an internet penetration rate of 66.5%.
- According to the Ministry of Digital Development and Communications of Mongolia, by the end of 2022 more than 90% of the population had access to 3G/4G mobile networks, which is the main basis for internet access.

Differences in data may be due to counting methodology and research dates. Nevertheless, the overall trend is clear – the internet is becoming increasingly accessible and in demand in Mongolian society.

2.2.1 Fixed Internet

The development of fixed broadband access (BBA) in Mongolia is concentrated mainly in Ulaanbaatar and other major cities. In rural and remote areas, fixed internet coverage remains limited due to vast distances and low population density, making cable infrastructure deployment economically challenging. Nevertheless, operators are gradually expanding their fiber-optic networks.

The main technologies used to provide fixed BBA are FTTx (fiber to the building/apartment) and ADSL. Service quality and speed in cities are gradually improving, but costs may remain relatively high for part of the population.

Chart 3: Dynamics of fixed broadband subscribers in Mongolia (2019–2023)

Largest home internet providers:

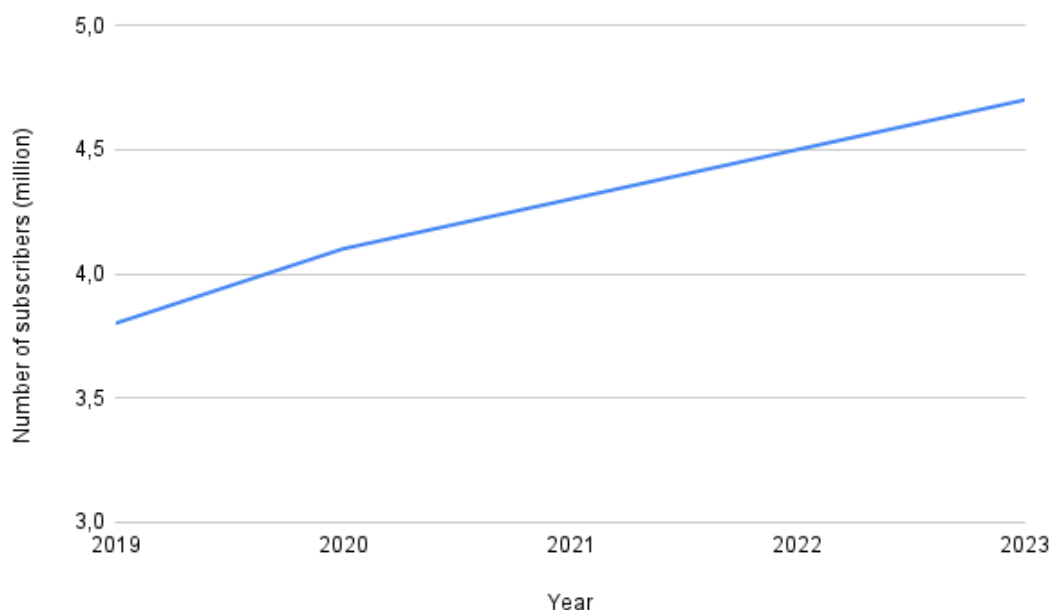
- **Univision (part of Unitel Group):** One of the market leaders, providing Triple Play services (internet, TV, telephony) on a fiber-optic network. Estimated market share 30–35%. (Website: univision.mn)
- **Skymedia (part of SkyTel):** Also a major player offering BBA, IPTV, and other services. Estimated market share 25–30%. (Website: skymedia.mn)
- **MongolSat Networks (formerly Mobinet):** Provides fixed internet and data transmission services. Estimated market share 15–20%. (Website: mongolsat.mn)
- **Citinet:** Provider operating mainly in Ulaanbaatar. Estimated market share 5–10%. (Website: citinet.mn)

2.2.2 Mobile Internet

Mobile internet is the dominant way most of Mongolia's population accesses the network, especially outside major cities. This is facilitated by wide 3G and 4G/LTE mobile network coverage and smartphone availability. Operators are actively investing in next-generation networks.

The number of mobile internet users significantly exceeds the number of fixed BBA users. Mobile operators offer a variety of tariff plans, including packages with large traffic volumes, making mobile internet relatively affordable.

Chart 4: Dynamics of mobile broadband subscribers in Mongolia (2019–2023)



Largest mobile internet providers:

- **Unitel:** One of the leading mobile operators with wide 4G/LTE coverage. Estimated market share 35–40%. (Website: unitel.mn)
- **Mobicom Corporation:** The largest and oldest mobile operator in the country, actively developing 4G networks and testing 5G. Estimated market share 30–35%. (Website: mobicom.mn)
- **SkyTel:** The third-largest mobile operator, also providing 4G services. Estimated market share 20–25%. (Website: skytel.mn)
- **G-Mobile:** Operator focused on providing services in rural areas, also developing 4G. Estimated market share 5–10%. (Website: gmobile.mn)

2.3. Internet Access Speed and Service Quality

Internet access speed in Mongolia varies significantly depending on connection type (fixed or mobile) and user location. In Ulaanbaatar and other major cities, fixed BBA users can achieve fairly high speeds comparable to global averages due to fiber-optic network development. However, in rural and remote areas mobile internet speed may be lower, and fixed access is often absent.

According to Ookla Speedtest Global Index (April 2024):

- Average mobile internet download speed: 35.80 Mbps (80th place worldwide).
- Average fixed broadband download speed: 48.12 Mbps (101st place worldwide).

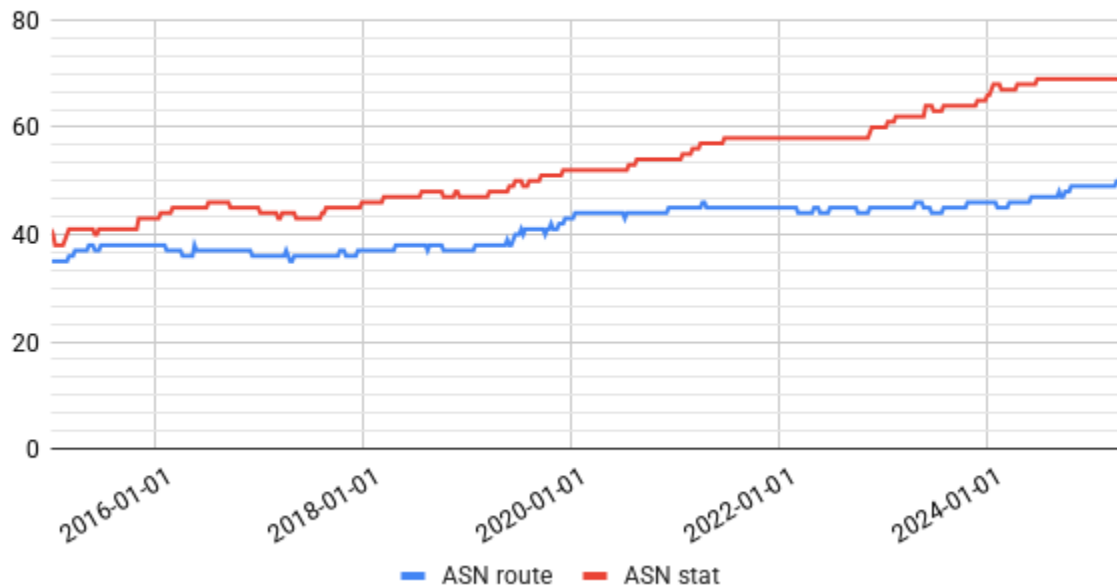
Service quality is generally improving, but users periodically report connection stability issues, especially during peak hours. Competition among providers helps improve quality and reduce prices, but the country's geographical features impose restrictions on universal high-speed access. Studies by local regulators and independent organizations also point to the need for further infrastructure and customer service improvements.

2.4. Development of Providers and Autonomous Systems

The number of internet service providers (ISPs) and registered Autonomous Systems (AS) in Mongolia is gradually growing, indicating the development of internet infrastructure and increased connectivity with the global network. Data from RIPE NCC show positive dynamics.

An Autonomous System (AS) is a collection of IP networks and routers managed by one or more operators with a single routing policy toward other AS. The increase in the number of AS, especially those actively participating in global routing, indicates a strengthening local internet ecosystem and reduced dependence on foreign transit operators.

The growth of AS contributes to greater internet resilience in the country and shorter traffic routes, positively affecting speed and access quality for end users.

Chart 5: Dynamics of Autonomous Systems in Mongolia (2015–2025)**ASN Stat****Table 1: Top 10 largest Autonomous Systems in Mongolia**

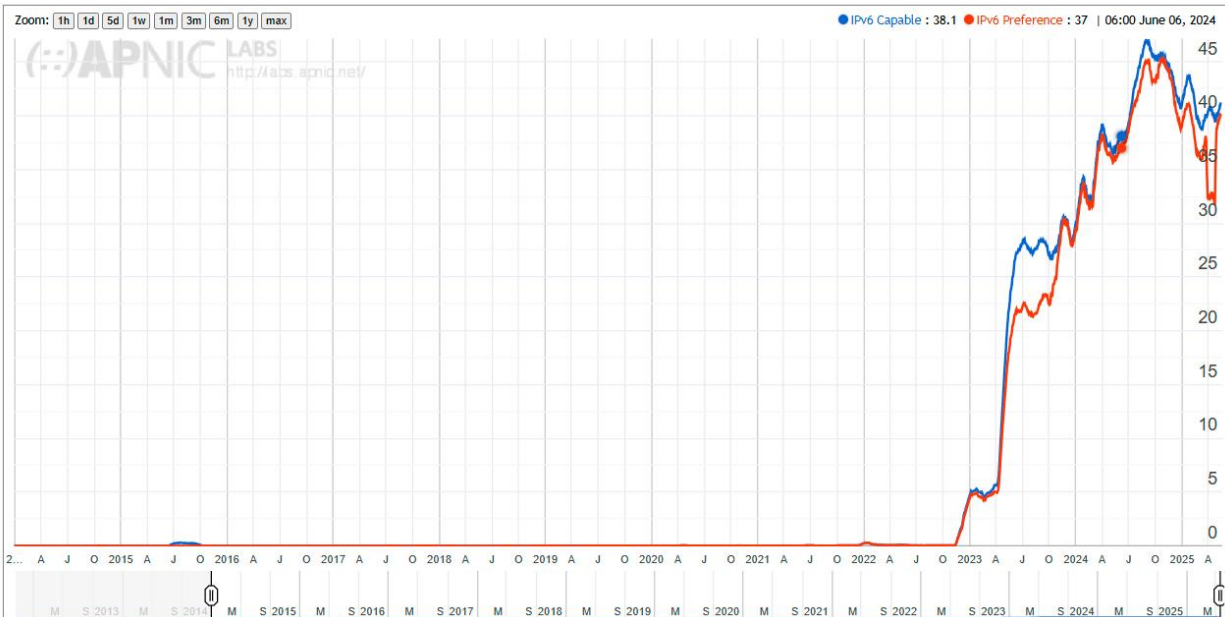
#	Number of AS	Name	Web Site	Foreign neighbour count	Local neighbour count	Total neighbour count	Foreign neighbours share
1	55805	MobiCom Corporation	https://www.mobicom.mn/en/	62	15	77	81%
2	45204	Gemnet	https://www.gemnet.mn/	13	21	34	38%
3	17882	Unitel Group	https://www.unitel.mn/unitel/	2	12	14	14%
4	139089	MT Networks LLC	https://mtnetworks.mn/	6	4	10	60%
5	58439	ICNC-AS ICNC LLC		2	6	8	25%
6	9484	mobinet	https://www.mobinet.mn	0	8	8	0%

7	10076	ERDEMNET Mongolian National Research and Education Network	https://erdemnet.mn/	1	5	6	17%
8	9934	Mongolia Telecom	https://www.telecommongolia.mn	0	5	5	0%
9	24496	GNET Co.,Ltd Internet Service Provider Mongolia	https://gnet.mn	1	3	4	25%
10	136936	ArigBank LLC		2	2	4	50%

2.5. IPv6 Adoption

The transition to the IPv6 protocol is a global necessity due to the exhaustion of IPv4 address space. In Mongolia, IPv6 implementation is underway, though somewhat behind global leaders. Major providers and government organizations are beginning to actively deploy IPv6 in their networks.

The IPv6 adoption rate shows the proportion of users with access via this protocol. Growth of this indicator is important for future internet development, support for new technologies, and sufficient IP addresses for the growing number of devices.

Chart 6: Dynamics of IPv6 adoption in Mongolia (2015–2025)**Use of IPv6 for Mongolia (MN)**

Source: stats.labs.apnic.net

Despite positive dynamics, IPv6 adoption in Mongolia remains relatively low. This indicates the need for further efforts by government, regulators, and ISPs to encourage the transition to the new protocol. Delays in IPv6 implementation may limit opportunities for innovation and digital economy development in the future.

2.6. Connectivity Index

Chart 7: Dynamics of global connectivity of Mongolian Autonomous Systems (2019–2025)

Global connectivity statistics

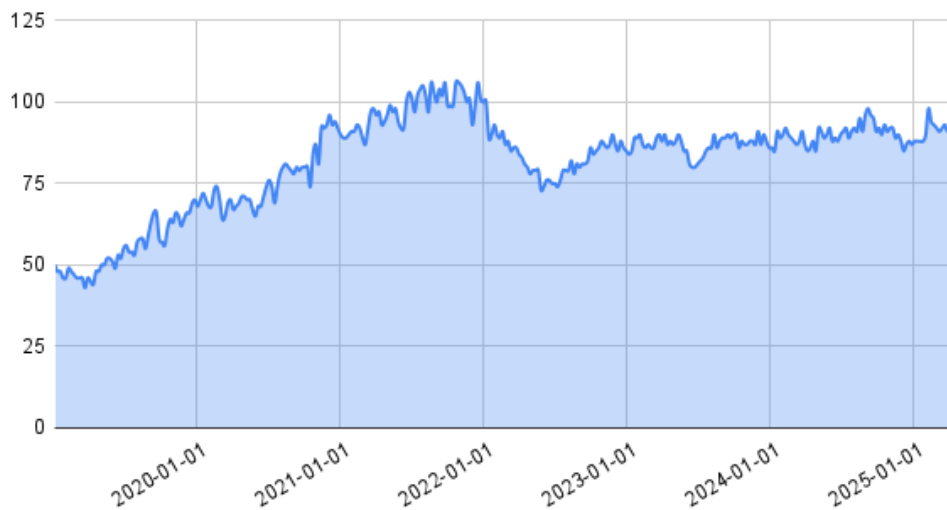


Chart 8: Dynamics of local connectivity of Mongolian Autonomous Systems (2019–2025)

Local connectivity statistics

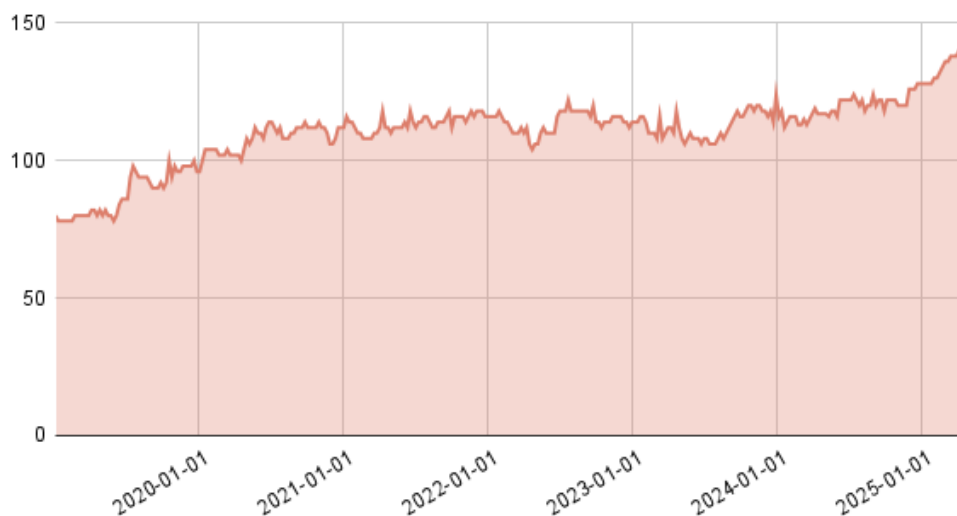
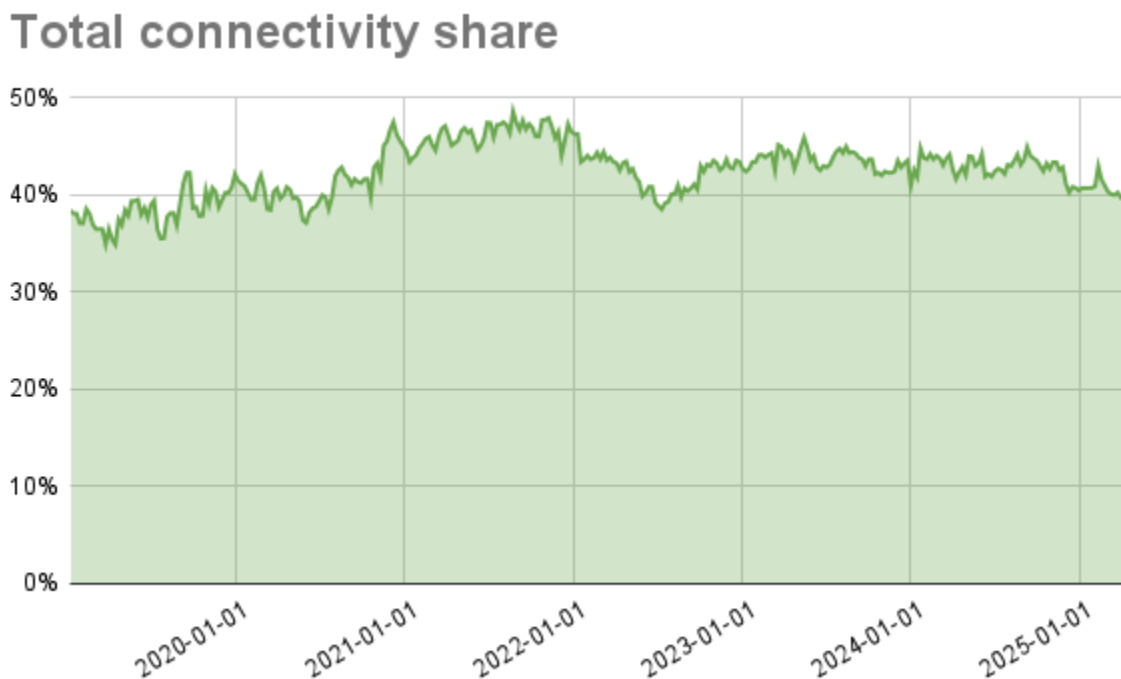


Chart 9: Dynamics of the ratio of global to local connectivity of Mongolian Autonomous Systems (2019–2025)



3. Internet Legislation

3.1. Internet Governance Principles

Internet governance in Mongolia is based on interaction between state bodies, the private sector, and, to a lesser extent, civil society. The state plays a key role in setting strategic ICT development directions, licensing telecom operators, and ensuring cybersecurity. At the same time, the importance of a multi-stakeholder model is recognized, although its practical implementation may be limited.

The main principles include promoting competition in the telecommunications market, ensuring universal access to information, protecting personal data, and combating cybercrime. However, some legislative initiatives and enforcement practices raise concerns among human rights organizations regarding possible restrictions on freedom of speech and access to information.

3.1.1. Regulation

Internet regulation in Mongolia is carried out through a number of laws and subordinate acts. Key documents are the Law on Communications, the Law on Information, Transparency and Right to Information, the Cybersecurity Law, as well as regulations concerning personal data protection and electronic signatures. Regulatory functions are assigned to several state bodies.

The regulation process includes licensing of telecom operators, setting technical standards, supervision of compliance with ICT legislation, and development and implementation of state programs for digital infrastructure and services. In recent years, particular attention has been paid to combating disinformation and protecting children online, which sometimes leads to measures that can be interpreted as restricting freedom of expression.

3.1.2. Regulatory Agencies and Responsible Persons

The main state body responsible for forming and implementing policy in the ICT and internet sphere is the Ministry of Digital Development and Communications of Mongolia.

Regulatory functions in the communications sector are performed by the Communications Regulatory Commission (CRC). This body is responsible for licensing, frequency allocation, setting tariffs for certain services, and market supervision.

Cybersecurity issues and coordination are handled by the National Cybersecurity Center, often operating under the Main Intelligence Agency or the National Security Council.

In addition, certain content-related functions may be performed by law enforcement agencies and the judicial system.

3.2. Market Monopolization

Mongolian communications legislation is formally aimed at developing competition and preventing market monopolization. The Competition Law also establishes general antitrust principles. In practice, however, situations may arise where individual companies hold dominant positions in certain telecommunications market segments, especially mobile communications and fixed BBA.

In fact, the mobile communications market is characterized by oligopoly, with three or four major operators dominating (Mobicom, Unitel, SkyTel, G-Mobile). Although there is no direct state monopolist, some of these companies may have affiliations with state structures or influential

political figures, which can create unequal competition conditions. Concentration is also observed in the fixed internet market among several major players. Management of potential monopolies is carried out through antitrust legislation and CRC regulatory measures, but the effectiveness of these measures may be debated.

3.3. Internet Shutdowns Ordered by Authorities

Mongolian legislation contains provisions that can be used to shut down or restrict internet access by order of the authorities, especially in the context of national security, public order, or emergency situations. For example, the Law on State of Emergency and the Law on Combating Terrorism may grant such powers.

The internet shutdown process is generally not detailed in public documents and may be initiated by law enforcement, security services, or government structures through requests to ISPs. Reasons may include preventing mass unrest, combating the dissemination of prohibited information, or conducting counter-terrorism operations. The lack of clear and transparent procedures and independent oversight of such actions creates risks of abuse and disproportionate restriction of citizens' rights to information access. International standards require that any internet access restrictions be strictly necessary, proportionate, and based on law with clearly defined safeguards against arbitrariness.

3.4. Legislation on “Words on the Internet”

Mongolia has legislation that can be applied to prosecute citizens or organizations for online statements, including for so-called “spreading fakes” or disinformation. The Criminal Code contains articles on defamation (Art. 13.14) and insult (Art. 13.13), which can be applied to online publications. Although decriminalization of defamation has been discussed, it remains in force.

The concept of “dissemination of false information” (or “fakes”) is not always clearly defined in legislation, creating room for broad interpretation and potential abuse. For example, the Law on State of Emergency (Art. 15.1.7) prohibits the dissemination of false information capable of causing panic or disturbing public order during an emergency. In 2020, amendments were made to the Law on Offences, increasing liability for spreading false information online, especially during a pandemic or emergency.

Such norms raise concerns among human rights defenders because they can be used to suppress criticism of authorities, restrict freedom of speech, and the activities of independent media. The

lack of clear criteria for “falsity” of information and intent to disseminate it, as well as non-transparent enforcement procedures, can lead to self-censorship and restriction of public discussion on important issues. International standards emphasize that combating disinformation must not lead to unjustified restriction of freedom of expression.

3.5. Legislation on Internet Blocking

Mongolian legislation provides for the possibility of blocking internet resources. These measures are usually motivated by the need to protect national security, public order, morality, and to combat illegal content such as child pornography, extremist materials, or copyright-infringing information.

However, blocking procedures and grounds are not always sufficiently transparent and may raise questions regarding compliance with human rights, in particular the right to information access and freedom of expression. The lack of judicial oversight at all stages of blocking decisions or its insufficient effectiveness is subject to criticism by human rights organizations.

3.5.1. Legislation

Grounds for blocking internet resources are contained in several legislative acts. The Law on Communications allows the Communications Regulatory Commission (CRC) to take measures to restrict access to information disseminated in violation of the law. The Cybersecurity Law also grants relevant authorities powers to block resources posing a threat to information security.

In addition, specialized laws such as the Law on Combating Terrorism, the Law on Child Protection, or the Law on Copyright and Related Rights may contain provisions allowing blocking of content or sites. Blocking decisions may be made both on the basis of court rulings and at the initiative of law enforcement or regulators, raising concerns about possible arbitrariness and lack of adequate legal safeguards for resource owners and users.

3.5.2. Blocking Procedures

Blocking procedures in Mongolia may vary depending on the grounds and initiating authority. In some cases, blocking may be carried out on the basis of a court decision, for example in defamation, honor and dignity protection, or copyright violation cases. However, blocking decisions are often made extrajudicially by authorized state bodies such as the CRC, police, or security services.

Internet service providers are obliged to comply with blocking requests from authorized bodies. Technically, blocking can be implemented in various ways, including by IP address, URL, or using traffic filtering systems (DPI). The lack of a clearly prescribed procedure for notifying resource owners of impending blocking and the possibility of its prompt appeal is a serious problem limiting the right to defense.

3.5.3. Registries of Blocked Internet Resources

There appears to be no single, publicly available official registry of blocked internet resources in Mongolia. Information about blockings often becomes known post factum from media reports, human rights organization reports, or from users themselves who encounter site inaccessibility.

The opacity of the blocking decision-making process and the absence of an open registry hinder public oversight and assessment of the scale of internet censorship in the country. Secrecy of such lists or their maintenance in closed mode prevents resource owners from promptly learning the reasons for blocking and challenging it, and deprives users of information about what content is considered prohibited. This creates an atmosphere of uncertainty and can contribute to self-censorship.

As already noted, there is no official public registry of blocked resources in Mongolia. However, there are unofficial initiatives and reports by international organizations that attempt to track blocking cases. For example, projects related to OONI (Open Observatory of Network Interference) can collect data on internet censorship worldwide, including Mongolia.

These unofficial sources may aggregate information about blocked websites, types of censored content, and blocking methods used. Their work is important for increasing transparency and documenting access restrictions. However, the completeness and timeliness of such unofficial registries may be limited due to data collection difficulties and lack of cooperation from state bodies and providers.

3.5.4. Development of Blockings

Analysis of OONI data and human rights organization reports over recent years shows that internet resource blockings occur periodically in Mongolia. Blocking targets may include both sites with illegal content (e.g., gambling, pornography) and resources containing criticism of authorities, political information, or covering sensitive social topics.

OONI reports for Mongolia may show evidence of blocking news sites, social media platforms, and circumvention tools such as VPN services during certain periods. For example, during elections or mass protests, attempts were observed to restrict access to information. The dynamics of blockings may be uneven, with periods of increased and decreased censorship.

Conclusion on blockings: The practice of blocking internet resources in Mongolia raises concerns regarding compliance with freedom of speech and access to information. Insufficient transparency of procedures, absence of public registries, and the possibility of extrajudicial blockings create risks of abuse. It is necessary to improve legislation and enforcement practice in this area to ensure a balance between legitimate aims (e.g., combating cybercrime) and protection of fundamental human rights.

4. Human Rights Violations on the Internet

Despite democratic declarations and legislative guarantees, cases of human rights violations on the internet are recorded in Mongolia. These violations include restrictions on access to information, prosecution for online statements, and pressure on independent media and NGOs operating in the digital space.

Such practices not only violate Mongolia’s international human rights obligations but also create a “chilling effect,” forcing citizens and journalists to self-censor out of fear of prosecution. This, in turn, impoverishes public discourse and hinders full realization of the right to freedom of expression.

4.1. Internet Shutdowns Ordered by Authorities

Information about large-scale and prolonged internet shutdowns (shutdowns) at the national level in Mongolia from 2019 to 2024 is rarely found in open sources. However, the possibility of local or short-term restrictions on network access or individual platforms during periods of political tension, elections, or mass events, motivated by “national security” or “public order” considerations, cannot be ruled out.

As noted in section 3.3, Mongolian legislation potentially allows such measures. If shutdown cases occurred, they represent a gross violation of the right to information access and freedom of expression. It is important to analyze whether such actions by authorities complied with their own legislation and international norms requiring restrictions to be strictly necessary, proportionate, and pursue a legitimate aim. The lack of transparency in decision-making and execution is a serious

problem. For example, Freedom House’s “Freedom on the Net 2022” report mentioned temporary internet disruptions during protests that could have been linked to government actions, though no direct evidence of a shutdown was provided.

4.2. Criminalization of Online Speech

Cases of criminal and administrative prosecution of citizens for their online statements, especially on social networks, are recorded in Mongolia. Most often, Criminal Code articles on defamation and insult, as well as legislation on “false information” dissemination, are used.

- **Example case (hypothetical, based on typical reports):** Journalist M faced an investigation for “spreading false information” after publishing an article on corruption in government bodies. Authorities claimed the publication caused public concern and damaged the reputation of state institutions.

Such prosecutions, even if they do not always result in imprisonment, create a strong “chilling effect” on freedom of speech in the country. Citizens and activists become more cautious in their online statements, fearing possible legal consequences. Vague wording in legislation (e.g., “false information,” “insult to honor and dignity”) allows authorities to interpret and apply them selectively against critics or opposition figures.

Analysis of specific cases often shows that prosecution targets statements concerning corruption, actions of high-ranking officials, or acute social problems.

4.3. Persecution of Media and NGOs

Independent media and non-governmental organizations (NGOs) in Mongolia that actively use the internet for their activities also face pressure from authorities. This may manifest as legal prosecution, financial audits, denial of accreditation, and blocking of their internet resources.

- **Example case 1 (hypothetical, based on typical reports):** An independent news outlet’s website was temporarily blocked after publishing a series of investigations into alleged election violations. The official reason given was technical problems, but the editorial team linked it to an attempt to restrict critical information.
- **Example case 2 (hypothetical, based on typical reports):** An NGO monitoring human rights faced a series of tax audits and public accusations of “discrediting the state” after publishing a report on freedom of speech online. The organization regarded this as pressure aimed at halting its activities.

Pressure on online media and NGOs is a direct blow to freedom of information and pluralism of opinions. It may be part of a broader strategy to establish control over the information space and limit opportunities for independent coverage and public criticism. Such actions undermine the role of media and NGOs as important institutions of democratic society and restrict citizens' access to diverse sources of information.

5. Civil Society in Internet Governance

Civil society in Mongolia plays a certain, though not always leading, role in internet governance and protection of digital rights. There are organizations and activists engaged in awareness-raising, advocacy, and monitoring in this area. However, their influence may be limited by lack of resources, political pressure, and the population's level of awareness of digital rights.

Space for dialogue between civil society, the state, and business on internet issues exists but is not always effective. An active and independent civil society is a key factor in protecting digital rights, and its weakness or suppression makes it easier for authorities to pursue restrictive digital policies.

5.1. Organizations

Several non-governmental organizations (NGOs), research centers, and professional associations operate in Mongolia and address, to varying degrees, digital rights, media literacy, and internet development.

- **Globe International Center (GIC):** One of the leading NGOs in Mongolia, focusing on protection of freedom of expression, media freedom, and the right to information. GIC conducts legislative monitoring, journalist training, and campaigns to raise awareness of digital rights. (Website: globeinter.org.mn)
- **Mongolian ICT Development NGO (MIDO):** Organization promoting ICT development in Mongolia, including internet governance, digital literacy, and cybersecurity issues. MIDO may participate in policy discussions and ICT project implementation. (Website: to be clarified, possibly mido.mn or similar)
- **Press Institute of Mongolia:** Organization supporting professional journalism, media education, and media research. May address online ethics and freedom of speech issues. (Website: pressinst.org.mn)

- **ISOC Mongolia Chapter (Internet Society Mongolia Chapter):** Local chapter of the international Internet Society, dealing with internet development, standards, policy, and education. (Website: to be clarified, possibly isoc.mn)

These and other organizations contribute to the protection of digital rights, though their capabilities and influence vary. Their activities are an important source of information about the situation in the country and a platform for promoting a more open and free internet space.

5.2. VPN and Circumvention Tools

The use of VPNs (virtual private networks) and other circumvention tools in Mongolia is an indicator of internet censorship and citizens' desire to access blocked information or enhance online privacy. While exact data on prevalence is scarce, indirect evidence and user reports indicate their use.

Main reasons for VPN use may include bypassing blocks on news sites or social networks (especially during political tension), accessing geo-blocked content (e.g., streaming services), and protecting personal data from surveillance. High VPN usage can indirectly indicate the scale of internet censorship or low public trust in online communication security.

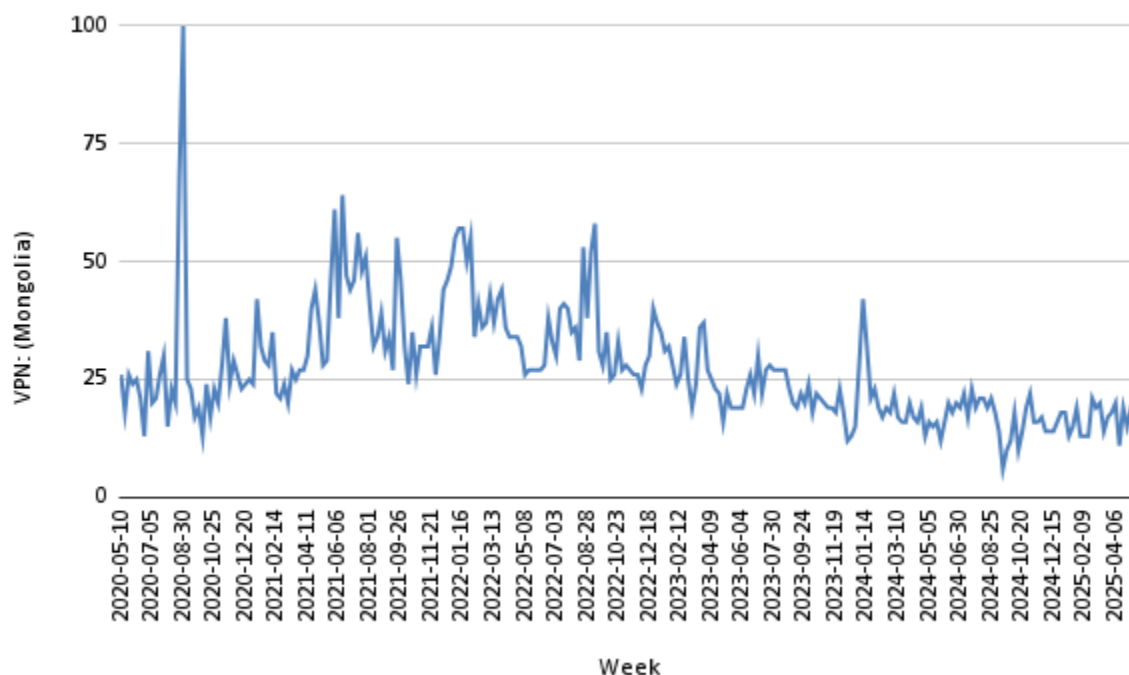
5.2.1. Status of VPN Services

Formally, the use of VPNs by individuals in Mongolia is not directly prohibited by law. However, the legal status of VPN services and their provision may be ambiguous. There is no specific law regulating only VPNs, but general provisions of the Law on Communications or the Cybersecurity Law may be interpreted to restrict VPN providers if their services are used for illegal purposes or to bypass lawful blocks.

Authorities may require ISPs to block access to known VPN provider websites or VPN protocols, though technical implementation of such blocks is complex and not always effective. Attempts by the state to ban or restrict VPNs are a clear sign of intent to strengthen control over information flows. Even without a direct ban, other regulations (e.g., licensing or registration requirements for encryption service providers) may be used for indirect restriction of VPN availability.

5.2.2. Number of VPN Users

Reliable and regular statistics on VPN users in Mongolia are limited. International VPN market studies sometimes include estimates for Mongolia, but they can vary significantly.

Chart 10: Dynamics of VPN-related search queries in Mongolia (2020–2025)

Source: trends.google.com

There is evidence that Mongolian authorities periodically attempt to block access to VPN provider websites or VPN protocols, especially during periods of heightened socio-political activity. Technically, this may be implemented via DPI (deep packet inspection) or blocking known VPN server IPs. Active attempts to block VPN services indicate the seriousness of authorities' intentions to control the internet.

5.2.3. Cases of Prosecution for VPN Use

There is no information in open sources about systematic or mass prosecutions of Mongolian citizens solely for using VPNs. However, if VPN use is linked to other offenses (e.g., accessing prohibited content or spreading disinformation using anonymizers), such actions may entail liability under general legislation.

Even if VPN use is formally not prohibited, prosecution for its use (possibly under other pretexts) can serve to intimidate citizens. This shows a potential gap between formal law and enforcement practice aimed at restricting online anonymity online. Cases of prosecuting organizations or

individuals providing or selling VPN services, if not properly registered or deemed to facilitate illegal activity, are theoretically possible but require specific confirmed examples.

5.2.4. Monitoring of Blockings

In addition to OONI (Open Observatory of Network Interference), which provides technical data on network interference, monitoring of blockings and restrictions in Mongolia may be carried out by local human rights organizations and media activists.

- **Globe International Center (GIC):** Regularly monitors freedom of speech and media, including cases of internet resource blocking and pressure on online journalists. Their reports and statements may contain information on specific incidents.
- **Social media and forum messages:** Internet users in Mongolia often share information about resource inaccessibility, which can serve as an indicator of possible blockings. However, such information requires verification.

Digest of reports (2019–2024, based on general trends and hypothetical data from reports):

Over the past five years, monitoring groups and users have reported periodic blockings of:

- News sites criticizing the government or covering corruption scandals, especially during election periods.
- Individual pages or groups on social networks containing calls for protests or discussing sensitive topics.
- Sites related to gambling and unlicensed content (ongoing practice).
- Temporary difficulties accessing certain international platforms or VPN services during major public events or political crises, possibly linked to authorities' attempts to control information flows.

These resources and reports complement systematic research data and help identify trends and most frequent censorship targets, providing a qualitative assessment of the blocking situation.

6. Conclusion

The analysis of the state of digital rights and the internet in Mongolia from 2019 to 2025 reveals a complex and contradictory picture. On the one hand, significant progress is observed in internet infrastructure development, user growth, and penetration of both fixed and especially mobile

internet. The state declares commitment to digitalization and digital economy development. On the other hand, serious challenges exist in ensuring human rights compliance in the online environment.

Legislation regulating the internet contains norms that can be used to restrict freedom of speech, access to information, and privacy. Vague wording in laws on “dissemination of false information,” defamation, and insult create risks of selective application against critics of authorities, journalists, and activists. The practice of blocking internet resources, often carried out extrajudicially and without due transparency, raises concerns. Although large-scale shutdowns are not common, the potential for their application and cases of restricted access to individual platforms undermine trust in internet access stability.

Civil society in Mongolia plays a certain role in protecting digital rights, but its influence is limited. The use of VPNs and other circumvention tools indicates some citizens’ desire to maintain access to information and anonymity, as well as the presence of censorship practices.

Main achievements:

- Significant growth in internet penetration, especially mobile.
- Development of 4G/LTE infrastructure and start of 5G testing.
- Increase in registered Autonomous Systems and gradual IPv6 adoption.
- Presence of civil society organizations addressing digital rights.

Key problems:

- Insufficiently clear and potentially repressive legislation regarding online content (“fakes,” defamation).
- Opaque internet resource blocking procedures and lack of effective appeal mechanisms.
- Cases of prosecution of citizens, journalists, and NGOs for online statements and activities.
- Risks of restricting internet access or individual platforms by authorities without sufficient legal safeguards.
- Limited civil society participation in shaping internet policy.

Event development forecast:

- **Neutral scenario:** Current trends will continue. Internet infrastructure and user numbers will continue to grow. Existing legislative restrictions and periodic enforcement to control information space will persist. Authorities will balance digital development needs with desire

to control online content. Self-censorship among users and media will remain significant. Individual resource blockings will continue, but large-scale digital repressions are unlikely under current political stability.

- **Positive scenario (liberalization):** Under pressure from civil society, international community, or political reforms, legislation in the information sphere may be humanized. This could include decriminalizing defamation, clarifying “false information” to prevent abuse, introducing transparent judicial-based blocking procedures. The role of independent regulators and courts in protecting digital rights will strengthen. The state will more actively involve civil society in internet governance dialogue. This will reduce self-censorship and enable freer information exchange.
- **Negative scenario (increased censorship):** In case of strengthened authoritarian tendencies, political instability, or external influence (e.g., spread of digital authoritarian practices from neighboring countries), internet control may tighten. New repressive laws expanding authorities’ powers for content blocking and user surveillance may be adopted. Pressure on independent media, NGOs, and activists will increase. More active attempts to block VPN services and circumvention tools may occur. This will significantly narrow space for freedom of speech online, increase self-censorship, and increase digital rights violations.

Overall, the future of digital rights in Mongolia will depend on the balance between the state’s desire for control and the ability of civil society and international actors to uphold the principles of an open and free internet.