

Stakeholder Analysis for Mongolia with a local focus on Nalaikh

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Just Energy Transition in Coal Regions



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Abbreviations and Acronyms

CHP	Combined Heat Power
CBO	Community-based Organisations
CSO	Civil Society Organisations
GDP	Gross Domestic Product
GHG	Green House Gas Emissions
IKI-JET	Innovation Regions for a Just Energy Transition
JET	Just Energy Transition
JET-CR Platform	Just Energy Transition in Coal Regions - Interregional Platform
NDC	Nationally Determined Contributions
NGO	Non-Governmental Organisation
SME	Small and Medium Enterprise

1. Overview of the stakeholder analysis

Mongolia is highly dependent on coal mining for export and domestic energy production. As a result of the country's dependence on coal, a Just Energy Transition (JET) will have varying degrees of impact on those whose activities are directly linked to coal as well as on the entire economy. The current policies at the national and local levels point to a future economic model in which coal continues to play a major role in energy production and as an export commodity.

The coal value chain in Mongolia is not yet facing disruptions amid the global transition toward reaching net-zero emissions. This is due to high domestic coal usage as well as because Mongolia mainly exports coal to China (U.S. Environmental Protection Agency, 2015). However, projections from the International Energy Agency (2022b) show an increase in global coal demand through 2024 before it plateaus. The latter implies that global coal consumption will need to decline quickly and sharply thereafter to reach the goals of the Paris Agreement (International Energy Agency, 2021). Even if the disruption of Mongolia's coal value chain is not yet visible, the global trend will create significant risks for Mongolia's coal industry. Risks might include revenue loss from reduced coal exports, job losses across the coal value chain, and the loss of the economic ecosystems and business models around coal mining communities without a timely and effective economic diversification. This economic risk is likely to come along with the need to transition the fossil fuel-based electricity and heating system towards a net zero energy system in Mongolia. In 2021, the country spent 24.2 billion MNT on coal subsidies for both mining and electricity generation (UNDP, 2022).

A JET requires Mongolia to strengthen energy procurements, public-private partnerships, foreign investments, and legislation and create an economically flexible market.

While the national picture provides some insights into how the local situation can look like amid a coal phase-out scenario, this analysis takes the district of Nalaikh as its spatial focus. Nalaikh exemplifies the dynamics within a district that has phased out coal, yet remains heavily dependent on it for energy production, economic development, employment, and taxes. As stakeholders from both the national and local level (Nalaikh) are studied, two targets are considered: (1) analysing how different stakeholders at national and local levels are affected by the JET, and (2) how these stakeholders shape the JET process. This approach seeks to evidence the stakeholder dynamics around JET, providing a more detailed approach to the JET situation in the country.

Although JET continues to be at a very early stage with stakeholders not yet fixed on a supporting or obstructing stand, certain learnings can be highlighted, especially regarding the stakeholder representation gaps that must be addressed to promote a Just Transition. At the national level, consumer groups and communities are scarce.

At the local level, the consumers and communities are fully absent, while economic actors, knowledge actors, trade unions, and workers are also not yet part of the JET-related discussions. A JET requires Mongolia to strengthen the energy procurements, public-private partnership, foreign investments, legislation and create an economically flexible market.

2. Understanding the relevance of "justice" in the transition

A just transition requires that all stakeholder groups and sectors affected by the energy transition participate in the discussions. This analysis aims to shed light on the role that different stakeholders take. Furthermore, gaps in groups not yet participating in stakeholder dialogues are addressed due to the complications that their absence poses to the implementation of inclusive dialogues.

It is fundamental that the affected groups, such as workers and communities, do not take the burden of transitions, and that stakeholders that are historically responsible for the climate crisis take responsibility for their side of the costs.

This analysis could thus act as a guide for inclusive dialog, and stakeholder participation, and hence actively work towards two principles: (1) distributive and (2) procedural justice of a JET in Nalaikh district as considered by researchers from the Centre for Strategic and International Studies (CSIS), the Climate Investment Funds (CIF) and the South Africa Presidential Climate Commission¹ (PCC). Distributive justice refers to how the risks and opportunities that emerge from a transition are distributed acknowledging intersectionality (e.g., gender, race, and class inequalities). It is fundamental that the affected groups, such as workers and communities, do not take the burden of transitions, and that stakeholders that are historically responsible for the climate crisis take responsibility for their side of the costs. Further, procedural justice emphasizes the relevance of a just participation of all stakeholders throughout the transition process. Thus, workers, communities, and local businesses must be able to participate in policy development. They must be empowered and supported during the transition in a way that their right to define their roles, development, and livelihood is recognized. Additionally, a JET can contribute to other elements linked to the concept of justice. For instance, JET can increase gross domestic product (GDP) and contribute to broader measures of welfare such as improved livelihoods, gender equality, and employment creation. Moreover, a cleaner and healthier environment, because of a JET, can increase the life expectancy of the Mongolian population (PCC, 2022).

¹ Cahill & Allen (2020); McCauley and Heffron (2018); PCC (2022)

The stakeholders considered for this research range from those having a high influence on the development of the JET process, those directly or indirectly hampering the JET, and those affected by the JET-related measures at either local or national levels. Due to the lack of support and real impact actions from the government on the JET, gender-specific groups, and other inclusive societies have the tendency to remain low-key. Further, stakeholders might have different levels of influence due to their ownership of local assets, which eventually impacts decision-making processes. Therefore, this approach aims to raise awareness of the importance of engaging in change processes relevant to the energy transition and to promote joint efforts. Additionally, this analysis encourages other actors not included in the study to engage in dialogues on JET to reach out to local stakeholders and enrich the discussions with further perspectives. For instance, educational stakeholders on the national level, such as from the Mongolian National University of Science and Technology (MUST) and the National University of Mongolia (NUM), can use this analysis as a case study on JET or include it as part of study curriculum analyses.

3. Key Stakeholder Identification

The JET project clusters stakeholders from local and national levels into six groups shown in Figure 1 (below). The following stakeholders are considered the target audience of the IKI JET project due to the relevance that they represent for a just transition:

Figure 1. Clusters for Key Stakeholders



These clusters were based on research performed by GIZ, the Wuppertal Institute², IISD/GSI³, and the Climate Investment Funds (CIF)⁴. Stakeholders within the clusters are the target audience of this analysis due to their direct or indirect linkage to the JET process.

Government, public administration, and authorities.

These actors are found within two levels: national and regional. Within the national level, actors such as ministries face challenges that may for example include macroeconomic imbalances, employment, and the transformation of the energy sector. At a sub-national level, regional authorities often focus on implementing resilient and region-tailored measures to overcome challenges posed by national and international scenarios. At a regional level, stakeholder engagement mechanisms, such as social dialogues, may take place and progressively lead to impacts on the national policy-making processes.

Power utilities and corporations of the coal industry.

These stakeholders are often owned by the state or account with state participation in their functioning. Actors within this group are crucial to a JET since they may be able to implement measures that counteract the challenges that may result from an energy transition (e.g., job generation, acquisition, or renovation of key infrastructure).

Economic actors.

Stakeholders within this group may include companies, investors, and Employers and Business Membership Organizations (EBMOs) that are, for example, integrated by players within the renewable energy, construction, electric industry, tourism, and agriculture sectors. Stakeholders linked to the green economy areas (e.g., renewable energies) are crucial to this cluster. Often, economic actors require the support of regional development strategies and a favourable national environment in order to implement their projects. They are important to the implementation of green economic activities that consider, for example, decent working conditions and the environmental impact of the actor's economic activities. Creating decent work opportunities, leaving no one behind, especially those who have invested in and have jobs in fossil fuels extraction and usage-driven sectors of the economy is imperative.

Civil Society & Community.

Stakeholders within this cluster include civil society organisations (CSOs), the representatives of community-based organisations (CBOs), and non-governmental organisations (NGOs) at local, regional, national, and international levels. The goal of JET is to include diverse actors within this cluster regardless of group vulnerabilities

² Wuppertal Institute (2022). Just Transition Toolbox for coal regions. Retrieved from www.coaltransitions-toolbox.org/

³ Zinecker, A., Gass, P., Gerasimchuk, I., Jain, P., et al. (2018). Real People, Real Change – Strategies for just energy transitions. Winnipeg: IISD. Retrieved from www.iisd.org/publications/report/real-people-real-change-strategies-just-energy-transitions

⁴ CIF (2020). Supporting Just Transitions in South Africa. Retrieved from www.cif.org/sites/cif_enc/files/knowledge-documents/supporting_just_transitions_in_south_africa.pdf

that could be found within the context (e.g., gender, ethnicity, country of origin, citizenship status, socio-economic background). This cluster enables stakeholders not represented in other clusters to be considered for JET discussions.

Trade unions.

Members of both formal and informal worker organisations are part of this cluster and are relevant for social dialogue. Input from this cluster can help safeguard working conditions and the promotion of more decent jobs amid an energy transition scenario.

Local knowledge actors and researchers.

Also referred to as the academia, knowledge developers from regional institutes, universities, and think tanks can contribute to a better understanding of low-carbon economic development, climate change, climate justice, and just energy transitions, among other subjects. Furthermore, actors such as regional development and investment agencies can also help increase the capacity and competencies through the promotion of for example impact assessments, strategy developments, and overall support in the energy transition.

4. Approaching stakeholders in the JET in Mongolia

It is initially important to consider that the views of national and local stakeholders can vary even within the same stakeholder cluster. Acknowledging that local territories have different stakeholder dynamics, this stakeholder analysis is specific to the Nalaikh district.

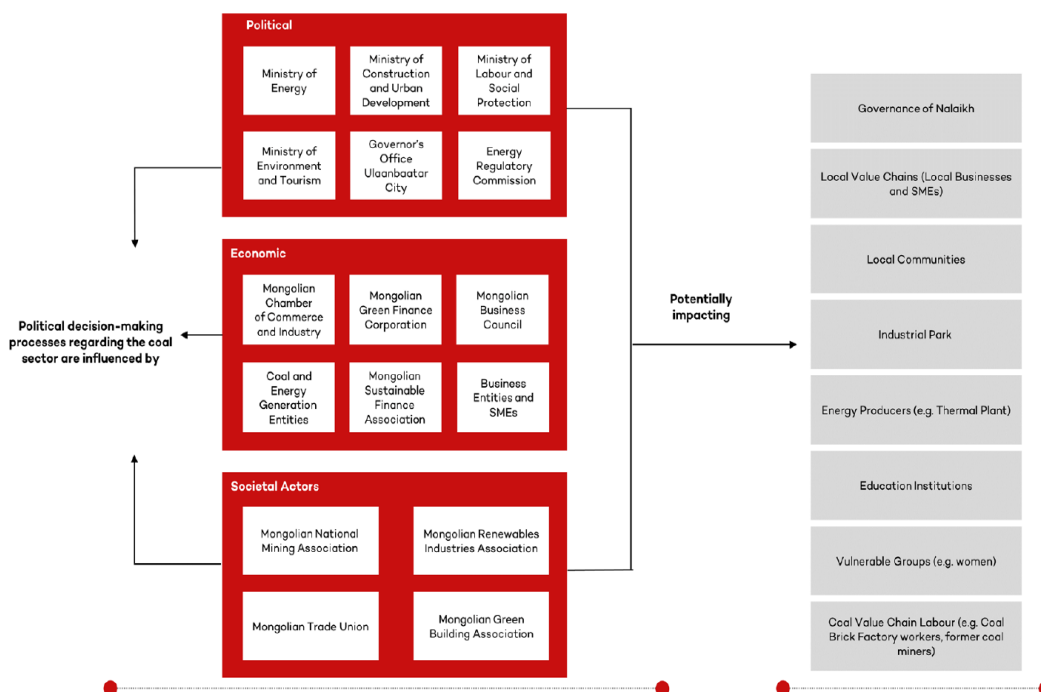
4.1 National Level

Despite an international context where pressure and efforts to reduce global GHG emissions increase, in Mongolia, the benefits of a global coal phaseout on the economy and energy system are not gaining traction for many stakeholders. The government lacks coal-related commitments (International Energy Agency, 2022) as stakeholders approaching the topic are overall in an initial phase where benefits and obstacles for JET are being analysed. To approach Mongolia's JET situation, stakeholders have been identified in accordance with the previously stated clusters (Figure 1).

Understanding the dynamics that take place at the national level enables a clearer understanding of how national decisions lead to changes at the local level. Dynamics at the national level can involve political, economic, and social actors, as considered by Ohlendorf, Jackob, and Steckel

(2022). Political stakeholders are chiefly linked to high-level legislative outcomes, economic stakeholders are often related to life standards, and social stakeholders can often validate or reject decisions being made, request adjustments, and propose alternatives or changes to such decisions. Within the JET context, these stakeholders can implement measures that may either facilitate or hamper a JET at the local level. Figure 2 (below) shows the main stakeholders influencing the national level JET-related activities in Mongolia as well as the stakeholders affected at the local level, thus in the Nalaikh district. The different roles played by stakeholders at the national level will be addressed in the following section to have a clearer view of how they can support, hamper, or modify their neutral stance towards a JET.

Figure 2. Stakeholders influencing national processes and locally affected stakeholders



Stakeholders’ stances on JET are not yet visible because their interests have not yet been affected by JET-related processes. Thus, the following paragraphs focus on providing an overview of the stakeholders' stances in relation to JET decisions.

4.1.1 JET Supporting Stances

For now, Mongolia has no real driving force on the national level when it comes to JET. Financial institutions, including private banks and development banks, seem to be the most active actors in fostering green investments in the country. Most efforts by private actors, such as building associations, have focused on auditing the viability of green investments (e.g., sustainable finance taxonomy), but without a specific focus on JET. Academic actors, international organisations, and renewable energy associations support the JET targets in principle, but not yet proactively.

Actors at the national level are actively advocating for GHG emission reductions in the country pushing for an alignment with Mongolia's NDC commitments⁵. National authorities have also committed to reducing emissions in the 2020-2024/Vision 2050 Action Plan⁶, yet they are simultaneously promoting further utilization of coal in the country.

4.1.2 JET Hampering Stances

Due to the heavy dependence of Mongolia's energy system and economic business model on coal, actions hampering the JET processes are not only numerous but also reflected in the key decision-making processes. Stakeholders influencing these measures include thermal power plants, mining companies, mining-related public actors (e.g., the Ministry of Mines and Heavy Industry), some business associations, and coal mining companies' associations. In addition, trade unions and informal miners have also spoken out against coal phase-out measures, fearing job losses. National authorities have not committed to either an international or a national coal phase-out agreement. Authorities continue backing the coal industry as they seek to rely on new coal-fired power plants to overcome the energy shortage (especially for heat production). Regardless of the support for the export-oriented coal industry and the government's plan to expand coal-based heat and power (CHP) plants in its 2020-2024 Action Plan⁷, national authorities are committed to reducing emissions as previously mentioned.

Actions hampering the JET processes are not only numerous but also reflected in the key decision-making processes.

Lastly, local communities are highly dependent on coal. A third of the national population lives in ger areas, which are tent-like settlements that often lack basic infrastructure and where coal is used to heat up homes (ADB, 2020b). In winter, coal burning in ger districts generates 80% of the air pollution in the country (Cousins, 2019), which has contributed to social protests demanding the government to act amid increasing health issues. Nonetheless, the lack of affordable heating alternatives makes it unlikely for people to move away from coal. State actors' measures, such as the introduction of improved fuel and the ban on raw coal in the case of Ulaanbaatar, which excludes companies with existing permission to operate power stations and thermal power plants, have had low positive impacts (Mongolian National News Agency, March 2018).

⁵ Mongolia's Nationally Determined Contributions (NDC) commitments can be found here: <https://unfccc.int/sites/default/files/NDC/2022-06/First%20Submission%20of%20Mongolia%27s%20NDC.pdf>

⁶ The Government's Action Plan for 2021-2030 can be found here: https://cabinet.gov.mn/wp-content/uploads/Vision2050_-2021-2030_Activities_Final_OE.pdf

⁷ The Government of Mongolia's action plan can be found here: https://cabinet.gov.mn/wp-content/uploads/2020-2024_-ActionPlan_GOM_Eng_Edited_OE-2.pdf

4.1.3 Neutral Stances

Some economic actors (e.g., SMEs) and certain construction-related public institutions can be considered neutral due to the lack of measures on JET. Yet, the current situation could position many other stakeholders within this group because the opportunities and risks are not yet clear for stakeholders.

Understanding the influence of stakeholders on decision-making processes and their interests before JET processes are launched, can reduce the number of JET challengers.

For the purpose of a JET, it is relevant to identify which stakeholder interests could be at stake and how impacts on these interests could push stakeholders to support or oppose a JET. Understanding the influence of stakeholders on decision-making processes and their interests before JET processes are launched, can reduce the number of JET challengers. At this point, neutrality does not mean that actors cannot contribute to a JET since parallel measures from different stakeholders can be inadvertently linked to a JET. For example, the Ministry of Labour and Social Protection supports job creation in all sectors, including energy and mining, but without specifically targeting green jobs. Similarly, the Ministry of Construction supports the adoption of energy-efficient construction through norms and standards. The latter indicates that a coordinated JET strategy is not inherently the key driver for JET.

4.2 Local Level

Although Nalaikh was the first district in Mongolia to completely stop coal mining in 2019⁸, it continues to rely on imported coal to meet its energy needs (e.g., electricity and heat generation) and its economic targets (e.g., jobs and tax revenues). Figure 3 (below) illustrates the stakeholders that are relevant to the JET process in Mongolia, especially in Nalaikh. The figure was developed with the help of the GIZ internal tool Capacity WORKS, which is used by collaborators in social change projects around the world where individuals, institutions, and societies enhance their capacities to manage development processes amid transforming scenarios.

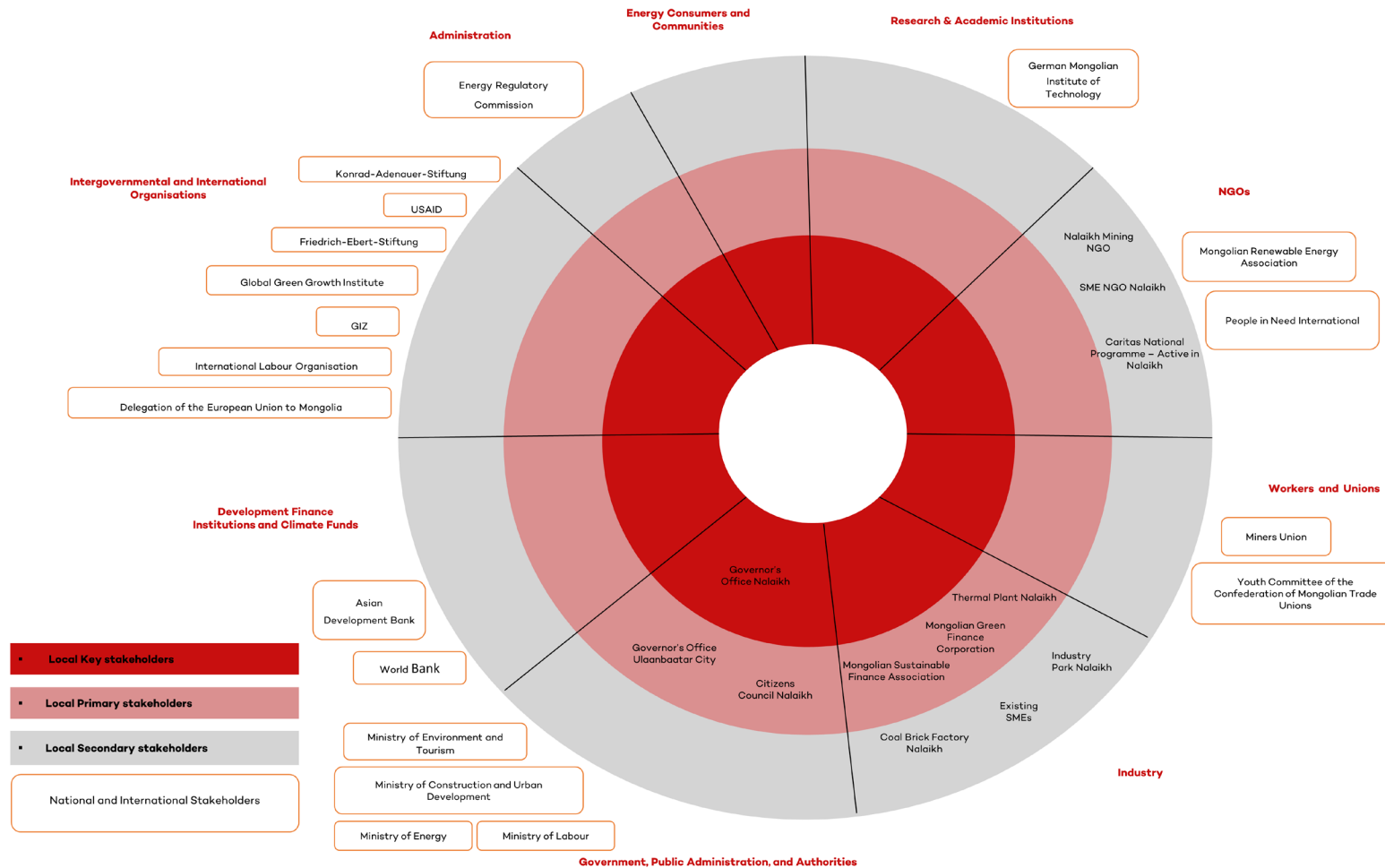
The inner stakeholder sphere shows actors that currently affect the JET process in Nalaikh (either positively or negatively). The stakeholders with relation to the JET at the national and international levels can be found surrounding this local sphere. As the figure shows, the key stakeholder to the JET in Nalaikh is the Governor's Office due to its direct power in decision-making processes with local impact.

⁸ In 2019 the Mongolian Government launched the Resolution N^o355 which targeted the elimination of negative mining impacts.

Stakeholder Analysis for Mongolia with a Local Focus on Nalaikh

When comparing the stakeholder cluster representation on the national and local level, with global good practice examples and examples found in literature, one can identify clear gaps in the visualized stakeholder landscape. The stakeholders identified for the local level are more restricted and thus require more attention. Identifying stakeholder representation gaps and addressing those gaps is a crucial part of a JET. In Figure 3 (below), most stakeholders are still in the observer mode and not actively engaging in structuring a JET process.













Figure 3. Stakeholder Map – National and Nalaikh Overview



As previously stated in Figure 1, research from GIZ, the Wuppertal Institute, IISD/GSI, and Climate Investment Funds have indicated that an ideal stakeholder map includes members of the public sector, from power utilities and corporations of the coal industry among other economic actors, civil society and community actors, trade unions, and knowledge generating stakeholders. Nonetheless, the Nalaikh context is differently integrated. There is a gap mainly among stakeholders representing the communities and vulnerable groups (e.g., gender-related groups) as well as research and academic institutions (knowledge and science-related actors). In Nalaikh, civil society groups are currently inactive in JET-related processes although partially represented through NGOs. Table 1 (below) illustrates the representation gaps in JET-related processes, considering the stakeholder cluster groups used for this analysis. Stakeholder representation is reflected in three colors, considering the following parameters:

- Blue: Cluster is represented (more than two stakeholders)
- Gray: Cluster is partially represented (two or fewer stakeholders)
- Black: Cluster is not represented

Table 1. Stakeholder representation gaps on national and local level

Stakeholder Cluster	National Level	Local Level - Nalaikh
Government, public administration, and authorities		
Power utilities and corporations of the coal industry		
Economic actors		
Civil society		
Trade Unions		
Local knowledge actors and science-related stakeholders		

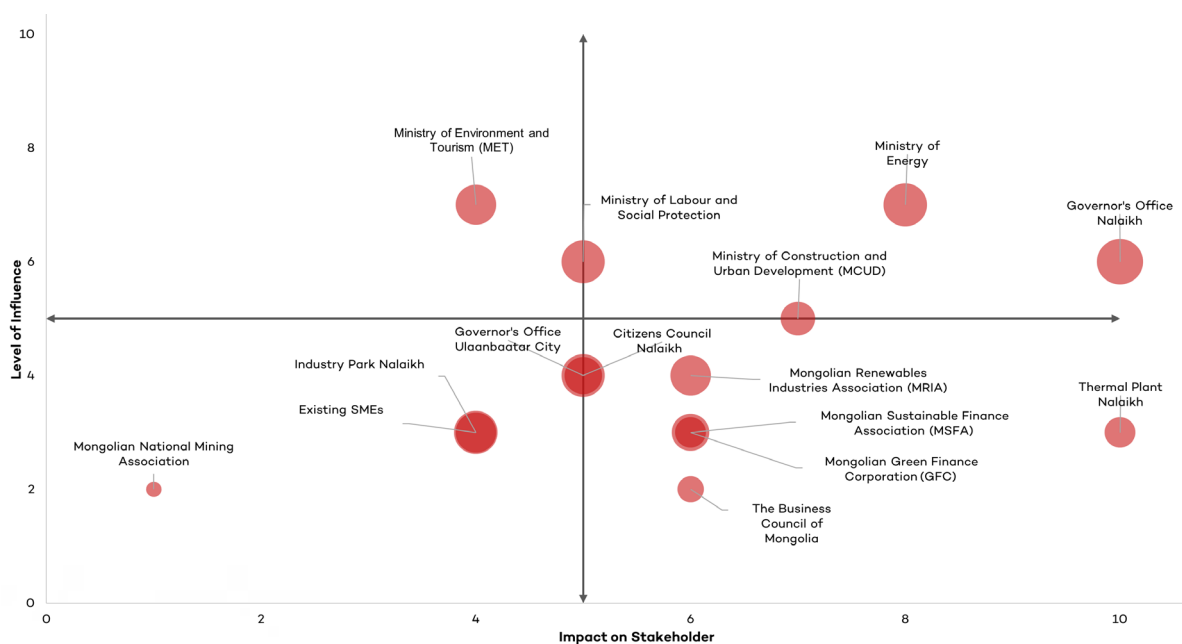
The biggest gaps can be found in Nalaikh, where fewer stakeholders are active on JET-related topics as considered by local observations. While Nalaikh's proximity to Ulaanbaatar could explain why several stakeholder groups are located in the country's capital, this report continues to focus on the local gaps. Some of the least represented clusters (e.g., trade unions and civil society) in JET discussions may experience a more direct impact of a JET, either due to the loss of jobs or to the improvement of health conditions with the closure of coal mines. Nonetheless, their voices are absent from discussions linked to the JET.

4.2.1 Power Structures in the Nalaikh District

For an effective governance model to be promoted, as considered by the Wuppertal Institute (2022)⁹, three elements have been taken into consideration: first, the influence that stakeholders have on JET processes, regulations, or overall decisions (x-axis); second, the level of impact that JET would have on stakeholders, and thus on their day to day business models or activities (y-axis), and third, the level of interest that stakeholders have on pushing a JET (red dot size, where smaller dots represent less interest and bigger dots represent higher interest). These three elements are portrayed in Figure 4 (below), as perceived by GIZ Mongolia. The results of this influence-impact-interest analysis showcase that there is a list of stakeholders that would be affected by JET, however, they do not have influence+ over JET-related decisions.

The figure also illustrates how the Thermal Plant in Nalaikh, which would experience the highest impact from JET, has also little interest in pushing the JET while its influence on decisions is limited.

Figure 4. Influence over impact and interest on stakeholders in Nalaikh¹⁰



Considering the stakeholder map that provided an overview of the national and local (Nalaikh) context (Figure 3) and as well as Figure 4 (above) on the influence, impact, and interest of stakeholders in Nalaikh, some positive and negative impacts of JET on different stakeholders should be acknowledged. These impacts would allow to assume the stance that actors could take once JET processes are in place. Furthermore, Table 2 (below) illustrates the different impacts that key stakeholders in Nalaikh can experience amid a JET process. This information is crucial for an efficient JET planning process so that risks and opportunities can be identified in a timely manner and addressed accordingly.

⁹ The Just Transition Toolbox for coal regions is available at <https://www.coaltransitions-toolbox.org/>

¹⁰ The influence that stakeholders have on JET is represented on the Y axis, while the impact that JET can have on stakeholders is represented in the X axis. The size of the red dots represents the interests that stakeholders have on pushing JET, considering a range of 1-10.

Table 2. JET impacts on Nalaikh stakeholders¹¹

Stakeholder	Impact	Main impact
Governor's Office Nalaikh	<ul style="list-style-type: none"> ✓ More involvement in regional development for example in economic diversification and employment generation ⊗ Less incoming taxes from coal-related industries ⊗ Restricted investment in new industries that could provide jobs ⊗ Limited coordination on new industries' finances ⊗ Social and economic issues amid rising unemployment 	Mostly Negative
Governor's Office Ulaanbaatar City	<ul style="list-style-type: none"> ✓ More relevant role in national energy transition discussions ✓ To be perceived as an ally and supporter of other governments 	Positive
Citizens Council Nalaikh	<ul style="list-style-type: none"> ✓ More space to promote inclusive growth governance ✓ More pressure to influence political decision-makers on JET-related subjects (e.g., labour market, reskilling, social protection) 	Positive
Sustainable and Green Finance Institutions	<ul style="list-style-type: none"> ✓ Business diversification opportunities ✓ More support for entrepreneurial networks ⊗ Limited skilled workers for emerging businesses 	Mostly positive
Thermal Plant Nalaikh	<ul style="list-style-type: none"> ⊗ Complete modification of the business model ⊗ Worker layoffs 	Negative
Local Industries (e.g., businesses and SMEs)	<ul style="list-style-type: none"> ✓ More investor interest in sustainable businesses ✓ Less support for coal-related businesses 	*To depend on the industry

¹¹ Impacts were based on research performed by the OECD (2019) on its report Regions in Industrial Transition: Policies for People and Places, as well as on research performed by the IISD and the Global Subsidies Initiative (2018) on its report Real People, Real Change; strategies for just energy transitions

Stakeholder	Impact	Main impact
NGOs	✓ Involvement in dialogues related to JET and potential contribution to policy frameworks	Positive
Air Pollution Department Ulaanbataar City	✓ More support and national urge to push good practices that reduce air pollution ⊗ To face resistance from coal-related stakeholders	Mostly positive

As visualised in Figures 3 and 4 (above), on the local level the Governor's office in Nalaikh is a key JET actor since it has the power to support the implementation of JET through action plans and can contribute to the engagement of different stakeholders as means to promote an inclusive JET process. The economic diversification, which JET can enable, would allow the district to attract more businesses and investments while safeguarding jobs and the life quality of individuals.

The economic diversification, which JET can enable would allow the district to attract more businesses and investments, while safeguarding jobs and the life quality of individuals.

For instance, once the Industry Park for building materials is established, alternative businesses for Nalaikh could emerge, resulting in a source of employment and tax revenues. An area of opportunity was identified as start-ups focused on green economic activities are not yet present at the local level. Nonetheless, a supported JET would attract the attention of stakeholders at the national level (e.g., MGFC), as well as at the international level (e.g., SME support program of the European Delegation). The involvement of the financing and banking sector with JET interests would be expected. Energy-related stakeholders such as the Thermal Plant and Coal-fired brick factory in Nalaikh, appear to have less influence on the decision-making processes, yet would be affected by JET measures and thus must be kept engaged in the JET progress to ensure a timely transition of individual business model and purpose. Stakeholders such as the Ministry of Labour and Social Protection, and the Governor's office at Ulaanbaatar City should be actively approached and informed during the process. Besides the neutral positioning, these stakeholders have a high influence on future decisions and might become the driving force to support JET.

5. Closing Remarks

This stakeholder analysis indicates a divided view among stakeholders at both the national and local levels. Considering that JET is a new topic that is being analysed in Mongolia, the stances of stakeholders are not clear. Focus has been placed on supporting or JET-hampering measures. Within this stakeholder analysis, actors considered as JET supporters (e.g., finance institutions) are not directly pushing a JET, however, their actions are partially in line with JET goals. Similarly, stakeholders opposing JET (e.g., Ministry of Mining) are mainly actors whose day-to-day business relies on coal and thus, they perceive the shifting of the coal sector as a threat to their performance.

Key stakeholder positions have been identified within this analysis. At the national level, actors from all stakeholder clusters were identified except for energy consumers and communities, thus leaving civil society unrepresented. At the local level, government authorities and administration, power utilities and corporations of the coal industry, and NGOs as the only link to civil society were identified. A representation gap was found in economic actors (e.g., development finance institutions), communities/consumers, local knowledge actors (e.g., research institutions), trade unions, and workers.

Considering that JET is a new topic that is being analysed in Mongolia, the stances of stakeholders are not clear.

In both the national and the Nalaikh districts, stakeholders are not yet involved in JET processes since they are still analysing its impact. Despite this early stage, stakeholders with high influence on decision-making processes that will be relevant to JET were identified (e.g., the Ministry of Energy, Ministry of Construction and Urban Development, and the Ministry of Labour and Social Protection). Further, some of the stakeholders that would be most impacted by JET would include the Governor's Office of Nalaikh as well as the Thermal Plant in Nalaikh. Additionally, the stakeholders interested the most in pushing the JET-related process include the Ministry of Energy, the Industry Park (building materials), and the existing SMEs in the district.

It is worth noting that Mongolia continues to have a strong coal dependence and that at the local level, Nalaikh only reflects this national coal dependence. The analysis further indicates that the Government's Office in Nalaikh represents an entry to JET discussions due to the stakeholder's influence and interest in the topic. Lastly, the rejection of shifting away from coal additionally evidences the lack of current alternatives. This limitation can be addressed with new players that offer energy alternatives as well as through the promotion of greener and energy-efficient manufacturing processes for different sectors. The latter can enable Nalaikh to stop its coal dependency as well as pave the way for other districts in Mongolia to follow.

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