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**COMPARATIVE ANALYSIS OF
INSTITUTIONAL ENVIRONMENTS OF
NON-GOVERNMENTAL ORGANIZATIONS**

IN MONGOLIA, HUNGARY, AND POLAND

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IN MONGOLIA, HUNGARY, AND POLAND**

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SUMMARY

Around 60 countries have amended their laws and regulations on Non-Governmental Organizations (Hereinafter “NGOs”) during the last four years. For instance, Russia’s Foreign Agent Act, Hungary’s Law on Transparency of Organisations Receiving Foreign Funds, and other policies restraining the operations and funding of NGOs. These restrictions are regarded as evidence of democratic backsliding. Such regulations demand NGOs to disclose their funding sources, private information, and internal documents to governments. The development and independence of NGOs are vital for a civil society and certainly for a democracy. This research paper posits that foreign funding is an inevitable part of fostering civil society and the operations of NGOs in young democratic countries, such as Mongolia, Hungary, and Poland. Hence, tight regulation over foreign sources of NGO funding is highly likely to pose serious constraints. This paper analyzes the institutional environment of NGOs operating in Mongolia in comparison with Hungary and Poland.

Keywords: *civil society, civil society organizations, institutional environment, democratic backsliding, non-governmental organizations.*

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INTRODUCTION

The number of democratic countries has expanded from 35 to 110 during the third wave of democracy, a term coined by Samuel P. Huntington, which began in the 1970s. Most of these countries transitioned to democracy, particularly following the end of communist rule in Central and Eastern Europe in the 1990s. Unfortunately, forward progress to full democracy has been lagging or even ended in certain countries, and instead, democracy has been backsliding further since 2006. For instance, democratic backsliding is occurring in Hungary and Poland which had the highest levels of sustainability among countries that went through democratization (CSO Sustainability Index, 2017).

Even though a coup d'état, a common form of democratic backsliding, became rather rare, government measures intended to weaken civil society organizations through restrictive legislations have been increasing. NGOs, which are civil society organizations began forming only after the democratization of post-communist countries. Thus, the structure, funding, and operations of NGOs has, in many cases, not fully institutionalized. Moreover, existing regulations concerning NGOs are flawed in various ways and in the last four years, there has been a trend of deliberate attempts to restrain civil society in around 60 countries around the globe (CSO Sustainability Index, 2017). Mongolia's neighboring countries, China and Russia, were the first to most successfully and effectively restrict NGO operations.

To illustrate, in 2012, the Foreign Agent Act was adopted in Russia. The law was officially entitled as Legislative Acts regarding the Regulation of the Activities of Non-profit Organisations Performing the Functions of a Foreign Agent. The Act requires foreign-funded NGOs, which are conducting political activities, to be registered as foreign agents. This law brought criticism from leading international organizations, including CIVICUS, Human Rights Watch, and Amnesty International. Vladimir Lukin, a politician who served as Human Rights Commissioner of Russia, had lodged a complaint regarding this law to the Constitutional Court, but the law has remained in effect (Olienikova, 2017).

In 2016, the Overseas Non-Governmental Organization Law was adopted at the 20th meeting of the National People's Congress of China. The purpose of this law, which entered into force in 2017 is to monitor and restrict the foreign-funded or foreign NGOs operating within China. As a result of this law, all forms of NGOs are considered foreign NGOs and no distinction is made.

According to Fu Yeng, now over 700 foreign NGOs are operating in China (Feng, 2017). In general, the Chinese laws and regulations on NGOs are full of unclear and complicated provisions. As Feng (2017) wrote, it could be said that there are no laws on national NGOs. The Chinese government registers national NGOs as social organizations: mass organization, social association, professional association, social service organization, non-profit civil organization, foundation, or charitable organization. Once organizations are registered under those categories, they operate as semi-state agencies (Feng, 2006). In 1989, a dual control system was introduced in China by the Regulations on the Registration and Administration of Social Organizations. Under the dual system, NGOs were required to first obtain permission from a professional organization and then register at the Ministry of Civil Affairs. To be registered, NGOs must fulfill numerous requirements that include having at least 50 members, a private office, and funding reserves exceeding 100,000 Chinese Yuan. In addition to lengthy requirements, in practice, a request for registration is likely to be declined for various reasons. Furthermore, the government does not provide any support for these social organizations (Feng, 2017). The national NGOs are closely monitored when it comes to communications with other national and international NGOs (Baker et al, 2017).

To conduct a comparative institutional analysis, countries should be somewhat similar in economic, political, and social environments systems. However, Mongolia is rather distinct from Chinese and Russian systems and contexts, hence the current institutional environment of NGOs in Mongolia will be analyzed in comparison with Hungary and Poland, other Third Wave democracies. The first section explains the research methodology used in this paper. In the second section, a brief overview of NGOs in Hungary, Poland, and Mongolia are presented. The third section provides a comparative analysis of the institutional environment of NGOs in the three countries. In the last section, the author concludes the analysis and offers recommendations for the development of NGOs in Mongolia.

RESEARCH METHODOLOGY

A comparative analysis is an effective way to discover similarities and differences between institutions and learn from past experiences of other countries. It is a unique method because it does not only help to identify differences but also helps distinguish how those minor or major differences lead to various outcomes (Mintrom, 2012). Therefore, this paper utilizes a research method called “most similar system design”.

To apply this method prior research must be done before selecting countries for the analysis. Moreover, a comparative institutional analysis is a qualitative analysis and due to time constraints, only a few countries are selected for comparison. There are two ways to select the countries for the research, one is called “most similar” system design and the other “most different”. Hungary and Poland have

similar post-communist economic, political, and social environment to Mongolia. Thus, to comparatively analyze Mongolia’s institutional environments of NGOs, Hungary and Poland were selected for such research.

Lastly, before going in-depth on the comparative institutional analysis, it is necessary to establish the meaning of ‘institution’. According to Mintrom (2011) institutions are typically described as “the established rules of the game that constrain and guide the actions of individuals and groups in society”. This includes the laws, rules, and regulations as determining factors of institutions. Hence, the paper will closely investigate and compare relevant laws, regulations, and rules related to NGOs in Mongolia, Hungary, and Poland.

OVERVIEW OF NGOS IN HUNGARY, POLAND, AND MONGOLIA

Institutional Environment of NGOs in Mongolia

In Mongolia, the Law on Non-Governmental Organizations (“Law on NGOs”) was adopted in 1997. Most of the non-governmental organizations (“NGOs”), were established soon after the adoption of the Law on NGOs. According to the Ministry of Justice and Internal Affairs, at this moment, there are around 18,000 NGOs and around 48 percent of them (or 8,500 NGOs) are actively operating in Mongolia (Sainzorig, 2019).

The state of civic space in Mongolia was rated as “obstructed” in the World Civil Society Alliance Report. The rating “obstructed” signifies that civic space is heavily contested by power holders, who impose a combination of legal and practical constraints on civil organizations (CIVICUS, 2018). Under the current 1997 Law on NGOs, there are two forms of NGOs: associations and foundations. Shortly after, the Civil Act amendment of 2002 set out three forms of NGOs and non-profit organizations (“NPOs”): associations, foundations, and cooperatives. Due to these two overlapping and differing

regulations, NGOs and NPOs are facing operational challenges.

Funding is an important factor for the development of NGOs in Mongolia. The Law on NGOs defines the sources of funding, as follows:

1. *membership fees and donations;*
2. *donations from individuals, companies, and organizations;*
3. *income generated by mission-related economic activities;*
4. *loans, inheritances, and funds provided by the State budget for the project implementation.*

In 2019, the amendment of the General Taxation Law of Mongolia granted NGOs rights to engage in economic activities and utilize the income for mission-oriented and publicly beneficial activities. Furthermore, the government’s support to NGOs plays a critical role in cooperation between civil society and state, but it is not provided by the Law on NGOs. Since the adoption of the Law on NGOs in 1997, government funding has accounted

for less than two percent of total NGO funding in Mongolia. More than 80 percent of all NGOs are funded from foreign sources and hence accused, oftentimes unsubstantiated, of turning into foreign profit-making business entities instead of serving public interest (B.Enkhjargal, 2019).

Government funding for NGOs was included in the draft law on Non-Profit Legal Entities (“draft law on NPLE”) proposed by the government in October 2018. The draft law on NPLE provides provisions on previously unregulated aspects of NGOs and consists of 51 articles whereas current law on NGOs has 25 articles. It is crucial to note that the draft was proposed by the government without any prior consultation with civil society organizations. The draft law introduces a new structure, a Civil Society Development Fund, which will distribute state funding for NGOs and will be managed by a new state body, The Council for Civil Society Development. The Council will consist of nine members, comprising representatives of both government

and civil society organizations. According to the draft law on NPLE, civil society organizations will have the right to nominate four candidates for appointment to the Council, while the remaining five will be appointed by the Cabinet. Even so, only Cabinet has the right to appoint and the representational right is restricted to civil society organizations operating in the following fields:

- (1) *human rights and social welfare,*
- (2) *education, culture, and science,*
- (3) *health and sports,*
- (4) *environment.*

To conclude, 18,000 NGOs have been established since the adoption of the 1997 Law on NGOs (MojHA, 2018). However, government funding was not mandated per the current 1997 Law on NGOs, and thus the majority of NGOs in Mongolia are presently funded from foreign sources making them subject to government criticism and concern. The circumstances might change with the adoption of revised Law on NPLE, which will create the Council for the management of government funding to NGOs.

Institutional Environment of NGOs in Hungary

In Hungary, the Act of 1989 on Freedom of Associations, the Act of 1996 on Corporate Tax and Dividend Tax, the Act of 1998 on Public Benefit Status was adopted to regulate NGOs. The Civil Act regulates the establishment, operation, and reporting of NGOs. As of 2016, there

were 61,400 NGOs operating in Hungary.

The Civil Society Organization’s Sustainability Index 2017 pointed out that in the past few years the political, legal, and financial environment has deteriorated and so has the stability and integrity of NGOs in Hungary.

In 2002, the Hungarian government formulated its strategy for civil society, which became the main document for cooperation between the government and civil society. The strategy stipulates that the government will create the Civil Fund which was aimed to support the operational costs of NGOs and directly fund projects contributing to the development of civil society. To implement that strategy, the government adopted the Act on Voluntary Activities and National Civil Fund and changed the name of the Civil Fund to the National Cooperation Fund ("NCF") in 2011. It is important to note that the board of the NCF is appointed by the government, and as a result of the NGO's funding depends hugely on the government policies and programs of that time.

In fact, 2014 statistics show that more than half of NGOs are funded through their economic activities and government funding represents only 30 percent of total NGO funding (Vandor et al, 2017). The Law on Transparency of Organisations Receiving Foreign Funds ("Law on Transparency"), adopted in 2017, requires organizations receiving over 23,000 Euros from foreign entities to disclose funding sources on its websites, brochures, and printed materials (Jensen, 2017). In Hungary, around 80 NGOs declared that they receive foreign funding. This measure was justified by the legislators as a necessary policy against money laundering and terrorist financing, but the law has not been applied for such

aim yet.

A failure to comply with the Law on Transparency may result in heavy fines amounting to 2,900 Euros and other administrative penalties. As a result, twenty-three NGOs whose operations were constrained under the Law on Transparency submitted a joint complaint to the Constitutional Court, yet the law remains in effect. Szuleka, an advocacy officer at the Helsinki Foundation for Human Rights, argues that there are two main concerns with the Law on Transparency, namely severe sanctions and the possible decline of the public trust in NGOs. In addition, the Treaty of Functioning of the European Union prohibits restrictions on the free flow of capital between the member states but in recent years, there have been many cases of restrictions on NGOs that are not politically aligned with ruling governments in Hungary (M. Szuleka 2018). To illustrate, the Open Society Foundation, founded by George Soros, was declared as a public enemy supporting immigration to Europe. Thereby, in April 2016 the government pushed through an amendment of the Law on Higher Education and applied to deport the Central European University, funded by Soros, from Hungary (M. Szuleka 2018). The Statistics Office of Hungary also highlighted that the number of NGOs decreased by a few hundred in 2016, and that the income and employment of the entire sector diminished.

In summary, there are 61,400

NGOs operating in Hungary. In terms of government funding, the NCF is appointed solely by the governments and hence, funding depends on the whims and policies of elected authorities. Furthermore, the Law on Transparency enabled tight control

and monitoring over the NGO's funding sources and made it almost impossible to operate independently from the government. As the political, legal, and financial environment deteriorates, so does the number of NGOs.

Institutional Environment of NGOs in Poland

In Poland, NGOs are governed by the Law on Foundations of 1984 and the Law on Associations of 1989. In 2003, the Law on Public Benefit Activity and Volunteerism was adopted. In 2017, over 112,000 associations and 22,000 foundations were registered in Poland and around 70 percent of them are active (Sustainability Index, 2018).

In 2003, the Department of Economy and Public Benefit was responsible for matters concerning NGOs and started the Citizen's Initiative Fund, a strategic program, to support civil society organizations. The regulations allowed local authorities to qualify some NGOs as a public benefit organization. To fall under the public benefit organization category, the regulation requires NGOs to contribute to improving science, education, culture, sports, environment, local infrastructure, health, and social care.

As a result, quite a few public authorities permitted the establishment of NGOs for their acquaintances and even misappropriated the government budget by allocating funding to their NGOs. Furthermore, a local government authority made

amendments in the Law Assemblies that led to an increased local administrative power and banned any actions or movements of NGOs against government policies. Thus, only NGOs that are politically aligned with ruling regime and express support for government policies are likely to win a public fund. Nevertheless, it did encourage formation and development of new NGOs in rural areas (Paczesniak, 2009). As of October 2018, there are over 10,000 public benefit organizations.

As mentioned above, the public funds were allocated through the Department of Economy and Public Benefits, Public Benefit Works Council, and local government agencies. The government made significant changes and got an approval from the Parliament without any prior consultation with NGOs. The main purpose of this law is to gain centralized government control over NGOs. As a result, the Centre for Civil Society Development, a new agency that reports directly to the Prime Minister, was established under the revised Act on the National Freedom Institute in 2017. The agency is responsible for allocation of national

and international funds dedicated to the development of civil society, and has received condemnation from the Office for Democratic Institutions and Human Rights of European Union (OSCE, 2017).

The Sustainability Index shows that government monitoring and control over NGOs have dramatically increased in recent years (Sustainability Index, 2018). The draft of the Act on Transparency in Public Life was criticized for its negative outcomes from monitoring foreign funding, disclosing private information of foreign donors, and for potential effect on public participation. For instance, the Krakov Court requires additional documents from the previous two years whereas the Warsaw Court does not require such information for a request for public funding. This perfectly illustrates how courts interpret the law regarding NGOs in various ways for their convenience. Moreover, in Poland, the formal registration process is relatively easy for NGOs, but in some cases the deliberate delays and change of registration requirements are common.

In Poland, the operational conditions for NGOs that are advocating sensitive issues are worsening (Szuleka,

2018). This includes anti-racism organizations, migration advocates and watchdog organizations as well. The Polish government has also taken steps to undermine the public image of NGOs through media campaigns that damage the reputation of NGOs. The NGOs that are foreign-funded or hold positions against the government are particularly adversely affected. Case in point, the authorities seized the documents and computers of leaders of a protest against the Anti-Abortion Act in October 2016 (Sustainability Index, 2018). In another example, a German funded NGO stood up against the judicial reform and as a result, Akcja Demokracja was accused of promoting German's interests.

In short, 134,000 civil society organizations were registered, as of 2017, in Poland. The government funding of NGOs was misappropriated or allocated in non-transparent way by local governments. Related laws were amended by the government without any prior consultation with NGOs to gain centralized power over NGOs. Moreover, the reputations and operations of NGOs that advocate for minority rights or that appear against government policies have been harmed.

COMPARATIVE ANALYSIS

Over the last four years, the laws aiming to restrict the operations of civil society organizations were made not only in Mongolia, Hungary, and Poland but in more than 60 countries around the world. Since 2016 the restrictive actions have intensified, including:

1. *Operational restrictions*
2. *Harming the reputation of NGOs (particularly by spreading disinformation)*
3. *Harassing and emotionally abusing civil society advocates*
4. *Claiming that certain NGO operations are illegal (Szuleka, 2018).*

In 2010, the Fidesz party in Hungary and the Law and Justice party in Poland held power in government. Both are right-wing populist political parties that have stood by anti-migration policies. To illustrate, the Hungarian Prime Minister Viktor Orban officially announced that they will build a non-liberal state (Szuleka 2018). Consequently, these parties have changed the political environment and the checks and balances of each country's democratic system. Restrictions on civil society organizations has been just a part of a trend of democratic backsliding in both countries.

In 2017, around 112,000 associations and 22,000 foundations were registered in Poland and 70 percent of them were active. As of 2016, there are 61,400 NGOs are operating in Hungary. In Mongolia, there are 18,000 NGOs registered and 48.5 percent were actively operating as of 2017 (Sainzorig, 2019). For comparison, the Defacto Institute calculated the number of NGOs per 1,000 people, Hungary has 6, whereas Mongolia has 5,8, and Poland 3 respectively. In Hungary and Poland, the public benefit and volunteering activities are regulated by a specific law, but there is no regulation of such activities in Mongolia. Moreover, In Hungary and Poland, two forms of NGOs, including associations and foundations, are governed by separate laws – the Law on Foundations, and the Law on Associations, Mongolia does not have such distinction. In Mongolia, those types of regulations were introduced in a new draft of the Law on NPLE by the Ministry of Justice and Internal Affairs.

The Council has nine members, five are directly appointed by the Cabinet, and

four are nominated from the civil society organizations, but the Cabinet solely holds the right to appoint.

Table 1: Democratic backsliding trends occurring alongside with adoption of restrictive laws on NGOs.

	Hungary	Poland	Mongolia
Erosion of institutional checks and balances	Judicial independence: 2018 amendment of law on the administrative courts	Judicial independence: 2017 amendment of law on the judicial council 2017 Law on the Common Courts, 2017 Law on the Supreme Courts	Judicial independence: 2019 law on the legal status of the judges, - executive government involvement in judicial independence 2019 amendment of general administrative law
Restrictions on NGOs	2017 Foreign-funded organizations transparency law – similar to the Foreign agent law in Russia, which is supposed to monitor foreign funding	2017 The Law on the National Freedom Institute – an attempt to limit certain NGOs operations A draft Act on Transparency in Public Life for tightly monitoring funding of NGOs	2018 draft NGO Law – increased government monitoring on NGO funding

Table 2: Comparative Institutional Analysis

Comparing Countries	Relevant institutional design features	Relevant observed practices	Relevant observed outcomes
Mongolia	The Council for Civil Society Development, a new structure under the government Chair of the Board Civil society development fund	9 board members consists of government and civil society representatives Majority of members are politically nominated and appointed by Cabinet Elected by the board members Eligible to distribute the national and international donations, and public funding	Centralized funding structure Only available for NGOs operating in certain fields Activities of the representatives from the civil society organizations are restricted to certain fields Closed and unclear selection procedures

Hungary	Central and local government	Requirements & restrictions on the foreign funded NGOs 25% tax on foreign funded NGOs Disclosure provisions	Targeted discrimination against NGOs Reduced public trust in NGOs government campaigns against foreign funded NGOs Sanctions against NGOs supporting immigration
Poland	Center for Civil Society Development, a new structure under the government Committee for Public Benefit Activity More decision-making power for government	Rights to allocate European, international, and national funding for NGOs 11 board members consists of government and civil society representatives Representatives of the civil society are minorities Board is appointed by the government The legal restrictions on certain NGOs through public funding especially NGOs that carry activities in areas related to immigration and refugees	Centralized funding structure Closed and unclear selection procedures The chair has an exclusive power over the decision-making Limited public funding Discriminatory access to public funding Policies to pressure NGOs carrying activities on Women's Rights

The above tables 1 and 2 are summarized as follows. The tables show there is an increasing tendency to restrict the voice of civil society organizations in these countries. This trend indicates a form of democratic backsliding. International recommendations regarding public support to civil society development advice that the reallocation and distribution of funds should not be concentrated only in the hands of government bodies. Instead, funding should be a degree removed from government meddling and interference and be allocated by diverse bodies and organizations.

Article 47 of the revised Law on NPLEs of Mongolia stipulates that the Council for Civil Society Development has nine members, five of whom are directly appointed by the Cabinet, and four of whom are nominated by the civil society organizations, but appointed by the Cabinet. At the same time, the involvement of civil society representatives in the Council is limited. In addition, the nomination rights to the Council for Civil Society Development are only granted to civil society organizations operating in certain limited fields. Furthermore, NGOs that are funded from foreign sources are accused, without evidence, of turning into a foreign profit-making business scheme instead of serving the public interest.

The Hungarian government adopted the Act on Voluntary Activities and National Civil Fund to regulate the National Cooperation Fund (“NCF”). The board of the NCF is appointed by the government, and as a result, NGO funding hugely depends on the government policies and programs. The Law on Transparency of Organisations Receiving Foreign Funds requires organizations receiving over 23,000 Euros from foreign sources to disclose sensitive documents. Furthermore, NGOs in Hungary who have appeared out of line with government policies have been subject to false accusations and political targeting.

Under the Act on the National Freedom Institute (2017), the Center for Civil Society Development was established to allocate public funds for the development of civil society in Poland. The National Institute has 11 members and the Chair is appointed by a new government entity, the Committee for Public Benefit Activity. While most of its members are appointed by the Cabinet, and the Chair appoints five board members from nominees proposed by NGOs. In Poland, to request government funding NGOs have to fulfill different requirements depending on varying interpretations of the law by the courts. The Polish government has taken steps to undermine the public image NGOs through politically motivated media campaigns aimed at harming the reputation of NGOs.

CONCLUSIONS & RECOMMENDATIONS

In the process of democratic backsliding, political opposition and civil society representatives are affected the most because they are the first to address and oppose the actions of political leaders. The roles of NGOs are vital for the development of civil society and essential for democracy. In the analysis, it was shown that Mongolia, Hungary, and Poland adopted regulations on civil society, including NGOs and NPOs, soon after the Communist collapse and that became the foundation for the development of civil society and expansion of civic space and protection of fundamental freedoms of association and assembly. Despite that, these countries eventually have begun closing civic space by limiting the rights of civil society through similarly restrictive NGO legislation, harming the reputation of NGOs through coordinated media campaigns, or restricting foreign funding. The study revealed the following similarities and differences in the institutional environment of NGOs in Mongolia, Hungary, and Poland.

First, the degree of influence of NGOs in public policy or legislation is low. In Poland, the Act on the National Freedom Institute was amended without prior consultation with NGOs. Also, in Hungary, the NGOs pointed out that the comments on draft laws were never reflected in the law that was eventually adopted (The Council of Europe, 2016).

Secondly, the governments of Hun-

gary and Poland have been restricting NGO funding and Mongolia is considering adopting such restrictive measures. In Hungary, the National Cooperation Fund is subject to political influence as the board is appointed solely by the government. Moreover, the Law on Transparency of Organisations Receiving Foreign Funds, adopted in 2017, requires organizations receiving over 23,000 Euros from foreign sources to disclose detailed information of sources and infringement of the law constitutes heavy penalties. The government defends the tight monitoring of funds under the policy against money laundering and terrorist financing.

With regard to Poland, the local authorities have the right to grant permission to establish NGOs and allocate the Citizen Initiative Fund. Yet, the authorities misappropriated government funding to NGOs and provided funding to NGOs that are not carrying activities against government positions, platforms and policies. For example, in 2017, the Centre for Civil Society Development in Poland, an agency that is aimed to centralize the funding to NGOs, was created and the majority of its members are appointed by the Cabinet. The government has proposed a draft of the Act on Transparency in Public Life that is intended to monitor foreign funding and disclose private information of foreign donors.

Similarly, the draft law on NPLE, intro-

duced in October 2018, is intended to regulate NGO funding in Mongolia. According to the draft, the Council of Civil Society Development will be responsible for the allocation of funds to NGOs, will be appointed by the Cabinet and will also include some representation by politically appointed members from civil society organizations. On the other hand, the nomination rights are restricted to certain civil organizations and it is unclear if the funds from this entity can be distributed independently from political influence or government misappropriation. As we have seen from the case of Hungary and Poland, the government directly appoints the board and members of the Council dedicated to NGO funding, hence funding tends to be subject to government control. Furthermore, the funding allocation largely depends on prevailing political winds and policies of that time and even, and there will be a risk that public authorities may misappropriate funding to NGOs.

In short, civil society independence and foreign funding is crucial for the development of NGOs in young democracies as government funding is relatively limited and at risk of political influence and abuse. This research paper has demonstrated that there are similar patterns of government interventions against civil society organizations in developing democracies. Partially as a result of recently passed restrictive NGO laws in Hungary and Poland, ruling governments in both countries are not adequately reflecting the voices and perspectives of civil society in the legislation process. Furthermore, governments in both countries are intensively monitoring foreign-funding and harming the reputations of NGOs if activities are not politically aligned with government policies. Currently, Mongolia is discussing a draft Law on NPLE which will determine if Mongolia will go down a similar path of democratic backsliding that Hungary and Poland have undergone.

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