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The Language of Sovereignty: Statehood and Terminology in Mongolia and Buryatia, 1911–1924[1]

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Abstract

This paper examines the Mongolian terminology through which the Mongols asserted their independent status from the declaration of independence in 1911 to the proclamation of the Mongolian People's Republic in 1924, thereby tracing the emergence of the modern Mongolian concept of "sovereignty," expressed as *bürin erke* ("full power"). It argues that the Mongols conceptualized their independence from the Manchu Qing Empire through an indigenous framework, asserting the establishment of a Mongolian *ulus törü* ("state" and "legitimate rule") in 1911. From 1912, they invoked terminology derived from Mongolian translations of international law to strengthen its statehood and Buryat-Mongolian intellectual Tsyben Zhamtsarano played a significant role in this process. The paper further reveals that the origin of the term *bürin erke* emerged during the 1914–1915 Kyakhta tripartite conference, when the Mongols became an autonomy under Chinese suzerainty, a state with "half power." Buryat-Mongol intellectuals promoted *bürin erke* as a term that strongly implied the idea of "independence." After the 1921 Mongolian ("People's") Revolution, the term became an important expression used to assert Mongolia's independent status and appears to have been established by the late 1920s as a term denoting "sovereignty."

Keywords: Mongolian Sovereignty, 1911 Mongolian Independence, Kyakhta Tripartite Conference, Tsyben Zhamtsarano, Buryat-Mongol Intellectuals, International Law.

Introduction

On 1 December 1911, following the outbreak of the 1911 Chinese Revolution, the Khalkha Mongols declared independence from the Manchu-established

1 I would like to thank Tatiana Linkhoeva, Justine Buck Quijada, Sayana Namsaraeva, Isahaya Yoichi, and Tachibana Makoto for their encouragement and two anonymous reviewers for their insightful comments on the earlier version of this paper. This research is supported by Research Project Grants from the Resona Foundation for Asia and Oceania.

Qing Empire (1636–1912). On 29 December of the same year, they enthroned the Eighth Jebtsundamba Khutughtu, the center of the Khalkha religious belief, as the "Holy Emperor" (*Bogd Khaan*) and established the Bogd Khaan government. This event, together with the later 1921 Mongolian ("People's") Revolution, which removed the Chinese control over Mongolia, and the promulgation of the 1924 constitution proclaiming the Mongolian People's Republic (MPR), marked the foundation of the modern sovereign state of Mongolia.

The process of state formation between 1911–1924 resulted not only from the efforts of the Mongols seeking independence but was also largely shaped by the political influence of China and Russia. In particular, the 1912–1914 Russo–Chinese negotiation and the 1920–1924 Sino–Soviet negotiation concerning the political status of Mongolia played a decisive role in determining Mongolia's international status in this period. The first negotiation began shortly after the Russo–Mongolian Agreement of November 3rd, 1912, by which Russia recognized Outer Mongolia as an "autonomy." The newly established Republic of China, asserting that it had inherited the Qing imperial realm as its "territory," protested this agreement and claimed its "sovereignty" over Mongolia. After prolonged negotiations, the Russo–Chinese Declaration of 5 November 1913 was established, in which Russia successfully reduced the Chinese claim of sovereignty to a "suzerainty." Eventually, with Mongolian participation, the Russo–Sino–Mongolian Kyakhta Tripartite Agreement was signed on 7 June 1915, determining (Outer) Mongolia's international status as an autonomy under Chinese suzerainty. The second Sino–Soviet negotiation ended up with the establishment of the Sino-Soviet Agreement on 31 May 1924, by which Soviet Russia recognized Chinese sovereignty over Outer Mongolia.

This paper attempts to reveal how, during this period of 1911–1924, the Mongols conceptualized their independence from the Qing Empire and how they came to understand the modern concept of "sovereignty." Recent scholarship has increasingly deepened our understanding of how the international law was introduced into Asian polities and how western political concepts such as "sovereignty" and "suzerainty" were internalized and shaped modern Asian international relations and state-formation.[2]

Tachibana Makoto has demonstrated that the Mongols translated the *Wanguo gongfa* 萬國公法, the Chinese version of Henry Wheaton's *Elements of International Law*, into Mongolian as Tümen ulus-un yerüde-yin čaγaǰa (hereafter

2 Okamoto Takashi, eds., *A World History of Suzerainty: A Modern History of East and West Asia and Translated Concept* (Tokyo: Toyo Bunko, 2019). On the formation of China's claims of "sovereignty" and "territory" over Tibetan and Mongolia, see Okamoto Takashi 岡本隆司, *Chūgoku no tanjō: Higashi ajia no kindai gaikō to kokka keisei* 中国の誕生:東アジアの近代外交と国家形成 [The Birth of China: International Relations and Formation of a Nation in Modern East Asia] (Nagoya: Nagoya University Press, 2017), pp. 318–409.

TUYČ), and that this work influenced Mongolia's diplomatic negotiations in the early 1910s.[3] He also revealed how the Mongols responded to the 1912–1914 Russo–Chinese negotiations, showing that "suzerainty" was rendered in contemporary Mongolian as "limited governance" (Mo. *kemǰiyetü eǰerkekü qolbuγdal*) or "limited power" (*kemǰiy-e-tei erke*).[4] Furthermore, he examined in detail the Mongolian terms used to express the idea of "independence" during the period of 1911–1915, demonstrating that the key term "self-governing" (Mo. *öber-iyen eǰerkekü*, translated by Tachibana as "self-ruling"), which originally appeared as a translation of Chinese *zizhu* ["sovereignty"] in *TUYČ*, gradually shifted to use to translate the Russian *avtonomiya* ("autonomy"), and the modern Mongolian term for "independence" (*tusaγar toγtanil*) was most likely first appeared during the 1914–1915 Kyakhta tripartite conference.[5] Regarding the Mongolian response to the 1920–1924 Sino–Soviet negotiation, B. Lkhamsüren and Kiyan Jügderiin Bor, using Mongolian archival sources, have demonstrated the Mongolian People's Government's efforts to protect Mongolia's independent status.[6] Aoki Masahiro has revealed the political influence of Soviet Russia and Comintern in shaping the political status of Outer Mongolia in 1921–1924 by

3 Tachibana Makoto 橘誠 , "Mongorugo yaku '*Wanguogongfa*' ni tsuite モンゴル語訳『万国公法』について [The Mongolian version of *Wanguogongfa*]," *Inner Asian Studies* 内陸アジア史研究 21 (2006), pp. 85–96; Idem, "Mongolia's Encounter with International Law: Mongolian Translation of *Wanguogongfa*," *Vos'mye Vostokovednye Chteniya BGU: Sbornik nauchnykh trudov* (2017), pp. 302–309.

4 Tachibana Makoto 橘誠, *Bogudo-Hān Seiken no kenkyū: Mongoru kenkoku-shi josetsu, 1911–1921* ボグド・ハーン政権の研究:モンゴル建国史序説 [A Study on the Bogd Khaan Government: History of State-Building in Mongolia, 1911–1921] (Tokyo: Kazama Shobō, 2011), pp. 333–365. Also see the Mongolian translation: Idem, *Mongolyn martagdsan tüükh: Bogd khaant zasgiin gazar (1911–1921)* [The Forgotten History of Mongolia: The Bogd Khaan Government (1911–1921)] (Ulaanbaatar: MN Tekhnologi, 2011), pp. 313–344.

5 Tachibana Makoto 橘誠, "Mongoru 'dokuritsu' wo meguru honyaku gainen: Jichi ka dokuritsu ka モンゴル「独立」をめぐる翻訳概念:自治か、独立か [Translated Concept Regarding Mongolian 'Independence': Autonomy or Independence]," in Okamoto Takashi 岡本隆司 , ed., *Sōshuken no sekaishi: Tōzai Ajia no kindai to honyaku gainen* 宗主権の世界史:東西アジアの近代と翻訳概念 [A World History of Suzerainty: A Modern History of East and West Asia and Translated Concept] (Nagoya: Nagoya University Press, 2014), pp. 234–261; Idem, "Somewhere Between 'Independence' and 'Autonomy:' Translating Concept in Modern Mongolian," in Okamoto, ed., *A World History of Suzerainty*, pp. 177–198.

6 B. Lkhamsüren, *Mongolyn gadaad orchin töriin tusgaar togtnol* [Mongolia's External Environment and State Independence] (Ulaanbaatar: Mongol Ulsyn Shinjlekh Ukhaany Akademiin Tüükhiin Khüleeren, 1995); Kiyan Jügderiin Bor, *Mongolyn tusgaar togtnolyn gerel süüder* [The Light and Shadow of the Mongolian Independence] (Ulaanbaatar: Yösön-Erdene BBKhk, 1996).

using both Russian and Mongolian archival sources.[7] Finally, it is important to note that during the 1910s, Western concepts and terminology were introduced into Mongolia through Mongolian periodicals and the writings of Buryat–Mongol intellectual Tsyben Zhamtsarano.[8]

Building on previous scholarship, this paper analyzes the Mongolian terminology through which the Mongols claimed their independent status during the period 1911–1924 and hence approaches the emergence of the modern Mongolian concept of "sovereignty," expressed as *bürin erke* ("full power"). It focuses on the documents relating to the 1911 Mongolian declaration of independence and Mongolian responses to Russo–Chinese negotiations, Mongolian translations of international law, the Mongolian-language minutes of the 1914–1915 Kyakhta tripartite conference and both published and unpublished writings of Buryat-Mongolian intellectual Tsyben Zhamtsarano.

1. *Ulus Törü*: An Indigenous Mongolian Concept of "Independent State"

I begin by asking: through what principles did the Mongols declare independence from the Qing Empire in 1911? To answer this question, it is necessary to examine the Mongolian terms that appeared in key diplomatic documents in order to understand how the Mongols conceptualized being an "independent state." Two key Mongolian terms are central to this discussion, namely *ulus* and *törü*, denoting "state" and "legitimate rule," respectively. Below, I examine their usage in Mongolian documents and leave them untranslated in order to analyze the concepts they convey.

A document dated 1 December 1911, issued by the Khalkha Mongolian nobles to "the Mongol, Russians, Tibetans, Chinese (Mo. *irgen*) and all ecclesiastical and secular commoners" is generally considered as the Mongolian declaration of independence from the Qing Empire. This document states:

> At present, we often hear that in the southern land [China], the Manchus and Chinese are creating disturbances and are about to precipitate the fall of the Manchu *törü*. Because our Mongolia originally had been a separate *ulus* (Mo. *tusqai nigen ulus*) after consultations, we have now decided to constitute our own

7 Aoki Masahiro 青木雅浩, *Mongoru kingendaishi kenkyū: 1921–1924 Soto-Mongoru to Sovieto, Kominterun* モンゴル近現代史研究：1921–1924 外モンゴルとソヴィエト、コミンテルン [Outer Mongolia's Relationship with Soviet Russia and the Comintern: From 1921 to 1924] (Tokyo: Waseda University Press, 2011).

8 Huhbator フフバートル, *Mongoru-go kindai goi tōjō no botai: 'Mōwahō' shi kenkyū* モンゴル語近代語彙登場の母体：『蒙話報』誌研究 [The Foundations of the Emergence of Modern Mongolian Vocabulary: A Study of the *Mongγul üsüg-ün bodurul* Journal] (Sagamihara: Seizansha, 2012), pp. 65–70.

ulus (*öbesüben ulus bolun*) based on our former traditions and to establish a new *törü* (*sin-e törü bayiγulun*), without the interference of others in our own rights.[9]

Here, the fall of the Qing Empire is described as "the fall of Manchu *törü*." The Mongol then asserted that Mongolia had originally been a separate *ulus* from the Qing and declared their intention to reconstitute their own *ulus* ("state") and establish a new *törü*. While *ulus* is a fundamental Mongolian term denoting a state, nation, or country, *törü* (*doro* in Manchu) is a concept associated with imperial rule.[10] According to a 16th-century Manchu-Mongolian dictionary (with a foreword dated 1717), one of the earliest explanatory dictionaries from the Qing period, *törü* (a synonym of *yosu*) corresponds to "custom (*kem kemǰiyesü*), rite (*yosulal*), law (*qauli*),"[11] Furthermore, Lhamsuren Munkh-Erdene suggests that *törü* is a concept "similar to Chinese idea of *dao*, Indian or Buddhist *dharma* and European idea of natural law."[12] From the Manchu perspective, the incorporation of the Mongols into the Qing Empire meant that

9 The original Mongolian document and an English translation in Onon Urgunge and Pritchatt Derrick, *Asia's First Modern Revolution: Mongolian Proclaims Its Independence in 1911* (Leiden: E. J. Brill, 1989), pp. 126–130. There is also an English translation in Uradyn E. Bulag, "Independence as Restoration: Chinese and Mongolian Declarations of Independence and the 1911 Revolutions," *The Asia-Pacific Journal: Japan Focus* 52, no. 3 (2012), pp. 5–6. In these translations, *ulus* and *törü* are not translated separately but together as "a new independent nation" or "a new state." I modified their translations by leaving the two terms untranslated and used "separate" instead of "independent," which closer to the original Mongolian expression.

10 For detailed studies on the concept of *törü*, see Caroline Humphrey and Altanhuu Hürelbaatar, "The Term *Törü* in Mongolian History," in David Sneath, ed., *Imperial Statecraft: Political Forms and Techniques of Governance in Inner Asia, Sixth–Twentieth Centuries* (Bellingham: Western Washington University, 2006), pp. 265–293; Roman Yu. Pochekaev, "*Törü*: Ancient Turkic Law 'Privatised' by Chinggis Khan and His Descendants," *Inner Asia* 18 (2016), pp. 182–195; Munkh-Erdene Lkhamsuren, "In Accordance with the Great *Törü*: Pre-Modern Mongol Concept of Moral Order, Law and Government," in *Mongol sudlal ba togtvortoi khögjil, Olon Ulsyn Mongolch Erdemtnii XI ikh khurlyn "Mongolyn gadaad khariltsaa sudlal" IV salbar khuraldaany iltgelüüd* [Mongolian Studies and Sustainable Development, Proceedings of the Section IV "Mongolia's Foreign Relations Studies" of the 11th International Congress of Mongolists] (Ulaanbaatar: Olon Ulsyn Mongol Sudlalyn Kholboo, 2017), pp. 247–255. Also see discussion on Manchu *doro* in Nicola Di Cosmo, "State Formation and Legitimation," in Timothy Brook, Michael van Walt van Praag and Miek Boltjes, eds., *Sacred Mandates: Asian International Relations Since Chinggis Khan*, pp. 125–132.

11 The Mongolian title of this dictionary is: Qaγan-u bičigsen manǰu ügen-ü toli bičig. See the image on "Online Dictionaries and Full–text Search of Mongolian Languages and Written Manchu モンゴル諸語と満洲文語の資料検索システム" created by Kuribayashi Hitoshi 栗林均 [hkuri.cneas.tohoku.ac.jp/project1/imageviewer/detail?dicId=9&imageFileName=2–33b] (accessed 12 March 2026). Also see, Munkh-Erdene Lkhamsuren, "The 1640 Great Code: an Inner Asian parallel to the Treaty of Westphalia," *Central Asian Survey* 29, no. 3 (2010), pp. 269–288.

12 Munkh-Erdene, "In Accordance with the Great *Törü*," p. 248.

the Manchus had taken possession of the Mongolian *törü*.[13] In this logic, for the Mongols, to become "independent" from the Qing meant separating from the Manchu *törü*; therefore, in order to achieve "independence," they had to establish their own *törü*.

This understanding is also reflected in the ultimatum delivered to the last Manchu imperial resident in Khüree (now Ulaanbaatar), Sando (Sangdova). Sando had aggressively implemented the colonization and modernization policies of Qing ("New Policies") in Khalkha Mongolia in late 1900s and also had conflicts with the Eighth Jebtsundamba Khutughtu.[14] The ultimatum stated:

> [We] have been living peacefully after following the Yellow [Sect Buddhist] religion for several hundred years, and now not only have our traditions been destroyed […] but also they [Manchu-Chinese officials] have been brutally destroying the Yellow religion. […] We, the Mongols, cannot endure the hardships and sufferings under this kind of *törü*. […] Thus, we, the Khalkhas, have decided to elevate the Lama Jebtsundamba, the master of two customs (Mo. *qoyar yosun*), as the emperor, and establish a separate *ulus* (*tusaγar-a ulus*).[15]

Here, the Mongols referred to the oppressive Manchu rule (such as "New Policies") as the "hardships and sufferings" of *törü*. Furthermore, it stated that the Mongols had decided to enthrone the Eighth Jebtsundamba Khutughtu as emperor and allow him to undertake the "two customs." The concept of "two customs" referred to the Buddhist religion (*šasin*) and monarchical rule (*törü*), through which the Manchu Emperors had served as both protectors of Buddhism and as rulers who had the authority to organize armies and enforce law.[16] Furthermore, after the expulsion of Sando, a letter sent by the Khalkha Provisional Government (established on 30 November 1911) to the four Khalkha leagues and Inner Mongolian banners clearly linked the establishment of *törü* with the enactment of laws as: "It is time to establish the Great Mongolia's *törü*

13 Sugiyama Kiyohiko 杉山清彦, *Daishin-teikoku no keisei to hakki-sei* 大清帝国の形成と八旗制 [The Formation of the Qing Empire and Eight Banner System] (Nagoya: Nagoya University Press, 2015), pp. 231–232.

14 On "New Policies" and Sando, see Mei-hua Lan, "China's 'New Administration' in Mongolia," in Stephen Kotkin and Bruce A. Elleman, eds., *Mongolia in the Twentieth Century: Landlocked Cosmopolitan* (Armonk, New York: M. E. Sharpe, 1999), pp. 39–58; Nakami Tatsuo 中見立夫, "Sentō sannen no Kūlun: Manshū amuban, Roshia ryōji to mongoru-jin 宣統三年の庫倫：満洲アムバン、ロシア領事とモンゴル人 [Khüree in the Summer of Xuantong Thrid Year: The Manchu Amban, the Russian Consulate, and the Mongols]," in Hosoya Yoshio 細谷良夫, ed., *Shinchō-shi kenkyū no aratanaru chihei* 清朝史研究の新たなる地平 [A New Horizon in the Qing History Studies] (Tokyo: Yamakawa Shuppansha, 2008), pp. 310–333.

15 Onon and Pritchatt, *Asia's First Modern Revolution*, pp. 131–133. My modification of Onon and Pritchatt's translation.

16 An introduction to the concept of "two customs," see Christopher Atwood, *Encyclopedia of Mongolia and the Mongol Empire* (New York: Facts on File, 2004), pp. 558–559.

and enact laws."[17] The enthronement of the Eighth Jebtsundamba Khutughtu took place on 29 December 1911. To further consolidate his legitimacy, Jebtsundamba incorporated elements of Qing imperial kingship: he was enthroned as *Boγda qaγan* ("Holy Emperor") and granted the title of "dual ruler of *šasin törü* ("religion and state")."[18] On 30 December 1911, the Mongols proclaimed the renunciation of the Qing imperial reign-title *kebtü yosutu* (Ch. *xuantong* 宣統) and adopted a new title *olan-a ergügdegsen* ("Elevated by the Many").[19]

Importantly, in a document dated 12 December 1911, the Khalkha Provisional Government instructed the Khalkha leagues to train the armies and strengthen defenses. The document first quoted the above-mentioned independence declaration of 1 December stating that the Mongols intended to reconstitute a *ulus* and establish a *törü*. It then introduced a combined expression *ulus törü*, stating that the Mongols would establish a *ulus törü*.[20] This expression was not a provisional term, it continued to appear in subsequent documents.[21] In modern Mongolian, *ulus törü* denotes "politics." However, the term clearly did not mean "politics," but rather represented the combination of *ulus* ("state") and *törü* ("legitimate rule").

Entering 1912, as I will discuss in the following sections, a number of important documents in which the Mongols assert their "independent status," they referred to their state as *ulus törü*, rather than simply *ulus*. For instance, in a diplomatic note sent by the Mongolian government to nine major powers including France, Great Britain and Japan on 18 November 1912 seeking recognition of Mongolian independence, the Mongol stated that they "had separated from the Qing *ulus*, constituted themselves and established a self-

17 The original Mongolian is: "odu yeke mongγul-un törü-yi bayiγulǰu qauli ǰüil-i toγtuγaqu-yin čaγ." See, D. Dashnyam, T. Bilegsaikhan, Sh. Erdenebat and J. Urangua, eds., *Mongolyn tsagaagchin gakhai jiliin khuvisgalyn tüükhiin chukhag survalj* [The Essential Historical Sources of the Revolution of White Female Pig Year in Mongolia] (Ulaanbaatar: Soyombo Printing, 2011), p. 21. The date of this document is not clear, probably between 2–8 December 1911.

18 On Jebtsundamba's enthronement from a perspective of Tibetan Buddhism, see Ishihama Yumiko, "The coronation of the Jebtsundamba modeled on the Dalai Lama's enthronement," in Ishihama Yumiko, Tachibana Makoto, Kobayashi Ryosuke and Inoue Takehiko, eds., *The Resurgence of "Buddhist Government": Tibetan–Mongolian Relations in the Modern World* (Osaka: Union Press, 2019), pp. 107–124.

19 Emgent Ookhnoin Batsaikhan, *Mongolyn süülchiin ezen khaan VIII bogd javzandamba: amidral ba domog* [The Last Emperor of Mongolia Bogdo Jebtsundamba Khutukhtu: The Life and Legends] (Ulaanbaatar: Soyombo Printing, 2019), pp. 204–208.

20 "Since we decided to constitute a *ulus* […] and establish a new *törü*, it ought to train the armies in order to establish a *ulus törü*." (öbesüben ulus bolun […] sin-e törü bayiγulun toγtuγaqu-bar ǰöblen toγtuγsan učir odu ulus törü toγtuqaqui-dur erke ügei čereg-ün surγuli üiledkü yosun bükü). *Mongolyn tsagaagchin gakhai jiliin khuvisgalyn tüükhiin chukhag survalj*, p. 42.

21 *Mongolyn tsagaagchin gakhai jiliin khuvisgalyn tüükhiin chukhag survalj*, p. 49.

governing *ulus törü*."[22] Similarly, on 25 April 1913, after hearing that Russia and China were negotiating over Mongolia's political status, the Mongolian government protested Mongolia had already been constituted as a "fully governing *ulus törü*."[23] As far as I can confirm, the expression *ulus törü* continued to be used even in 1924, during the State Great Khural (Congress), where Mongolia asserted itself as a "*ulus törü* possessing full power" and independent from China (I will discuss the expression "self-governing," "fully governing," "full power" in the following sections).[24]

In sum, the 1911 Mongolian declaration of independence from the Qing Empire was not modeled on Western theories of state formation. "Independence" meant not only breaking away from the Qing *ulus* (state) but also rejecting the Manchu Qing *törü* (legitimate rule) established over Mongolia. The Mongols therefore sought both to reconstitute a Mongolian *ulus* as they had previously been, and to establish a Mongolian *törü*. The combination of these two terms as ulus törü demonstrates this conceptual framework. Thus, within a non-western Mongolian political context, to be a Mongolian *ulus törü* denoted the idea of being an independent Mongolian state.

2. "Self-Governing" (*öber-iyen eǰerkekü*): The Early Conceptualization of the "Independence"

From 1912 to the early 1920s, a key term utilized by the Mongols to assert their independent status was *öber-iyen eǰerkekü* (or *öbertegen eǰerkekü*, "self-governing"). This term first appeared in the phrase *öbertegen toγtuniǰu, öber-iyen eǰerkekü* ("self-constituted, self-governing") from the Mongolian version of the Russo-Mongolian Agreement concluded on 3 November 1912, which correspond to the Russian *avtonomnyi* ("autonomous") in the Russian version.[25] Tachibana suggested that this phrase was translated from the Chinese expression *zizhu zil*i 自主自立 in *Wanguo gongfa*, which corresponded to the English terms "sovereignty" and "independence," respectively, and used in T*ümen ulus-un yerüde-yin čaγaǰa* (*TUYČ*) to describe the American Declaration of Independence

22 The original Mongolian is: "Čing ulus–ača saluγad öbertegen toγtuniǰu öber–iyen eǰerkekü ulus törü bayiγulun." See original Mongolian document in Onon and Pritchatt, *Asia's First Modern Revolution*, p. 167.

23 Tachibana, *Mongolyn martagdsan tüükh*, p. 324. Also see footnote 71.

24 D. Dash, ed., *Bügd nairamdakh mongol ard ulsyn ankhdugaar ikh khural: 1924 ony XI saryn 8–28, delgerengüi tailan* [The First State Great Khural of the Mongolian People's Republic: November 8–28, 1924, Detailed Report] (Ulaanbaatar: Ulsyn Khevleliin Gazar, 1984), p. 76.

25 *Sbornik diplomaticheskikh dokumentov po mongol'skomu voprosu (23 Avgusta 1912 g.– 2 Noyabrya 1913 g.)* (St. Petersburg: Tipografiia V. F. Kirshbauma, 1914), p. 24; O. Batsaikhan, *Mongolyn süülchiin ezen khaan VIII bogd javzandamba*, p. 622.

from Great Britain.[26] Below, by examining the manuscripts of *TUYČ* and the writings of Zhamtsarano, I discuss how contemporary Mongols understood the term "self-governing," why they interpreted it as meaning "independence," and how the term was later downgraded to denote the Russian "autonomy."

A brief introduction to *TUYČ* is in order. Its origin, *Wanguo gongfa*, the Chinese version of Henry Wheaton's *Elements of International Law* (first published in 1836), was translated by William A. P. Martin (Ding Weiliang 丁韙良) and published in Beijing in 1864 and reprinted in Japan the following year.[27] It played a significant role in spreading the concepts of international law among East Asian polities, and initially introduced a number of important legal neologisms; the most notable being the term "sovereignty" (Ch. *zhuquan*; Jp. *shuken* 主權).[28] *TUYČ* appears to have been translated around 1912, when the Mongols were engaged in diplomatic negotiations with Russia.[29] Some chapters of *TUYČ* have draft and revised manuscript, and its translation of the terms varies from chapter to chapter, suggesting it was likely produced by multiple Mongolian translators, although the details are currently unknown.[30]

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26 Tachibana, "Somewhere Between 'Independence' and 'Autonomy'," pp. 179–180.

27 It is considered that the sixth edition of *Elements of International Law* was the original English version of the Chinese translation. See, Zhou Yuan 周圓, "Tei Iryō *Bankoku Kōhō* no honyaku shuhō: Kanyaku *Bankoku Kōhō* 1-kan wo sozai toshite 丁韙良『万国公法』の翻訳手法: 漢訳『万国公法』1巻を素材として [W. A. P. Martin's Translation Techniques in the First Volume of *Wan Guo Gong Fa*]," *The Hitotsubashi Journal of Law and International Studies* 一橋法学 10, no. 2 (2011), pp. 236. The English version is Henry Wheaton, *Elements of International Law*, 6th ed. (Boston: Little, Brown and Company, 1855). The Chinese translation is Huidun 惠頓 [Wheaton], *Wanguo gongfa* 萬國公法 [*Elements of International Law*], trans., Ding Weilinag 丁韙良 [William Alexander Parsons Martin] (Beijing: Chongshi guan, 1864, reprinted, Edo: Kaiseijo, 1865). The manuscripts of *TUYČ* are published in facsimiles: J. Amarsanaa, B. Bayarsaikhan and Tachibana Makoto, eds., *Tümen ulsyn yerdiin tsaaz* [Elements of International Law] (Ulaanbaatar: Admon, 2006).

28 See Chang Chia-ning ジャニン・ジャン(張嘉寧), "*Bankoku Kōhō* seiritsu jijō to honyaku mondai: Sono chūgokugoyaku to wayaku o megutte『万国公法』成立事情と翻訳問題:その中国語訳と和訳をめぐって [A Study of the Emergence and An Examination of the Chinese and Japanese Translations of [Henry Wheaton's] *Elements of International Law*]," in Katō Shūichi 加藤周一 and Maruyama Masao 丸山眞男, eds., *Nihon kindai shisō taikei*, vol. 15: *Honyaku no shisō* 日本近代思想大系 15 : 翻訳の思想 [A Series on Modern Japanese Thought, vol. 15: The Ideology of Translation] (Tokyo: Iwanami Shoten, 1991), pp. 381–400; Okamoto Takashi, "Suzerainty, International Law, and Translation: From the Eastern Question to the Korean Question," in Okamoto, ed., *A World History of Suzerainty*, pp. 73–94.

29 Tachibana, "Mongorugo yaku '*Wanguogongfa*' ni tsuite," pp. 92–94.

30 For a detailed examination on translation of *TUYČ*, see Zumber Orluud ウルルード・ズンベル, "Mongorugo yaku '*Wanguo gongfa*' no tekisuto to sono yakugo モンゴル語訳『万国公法』のテキストとその訳語 [An Analysis of the Texts and Translation Words of the *Tümen ulus–un yerüde–yin čaγaja*]," *Bulletin of Japanese Association for Mongolian Studies* 日本モンゴル学会紀要 53 (2023), pp. 15–31.

In *Elements of International Law*, "sovereignty" (*zhuquan*) is defined as "supreme power may be exercised either internally or externally."[31] In *TUYČ*, *zhuquan* was translated in a draft manuscript as *eǰen-ü erke* ("master/ emperor's power"), whereas in a revised manuscript as *eǰerkekü erke* ("governing power").[32] So far, I have not encountered documents during this period in which the *eǰen-ü erke* or *eǰerkekü erke* were used. Nevertheless, the definition of sovereignty as a power exercisable internally and externally likely contributed to the Mongols' understanding that an independent state not only governs its internal affairs but must also be recognized by foreign states. For instance, the Russian plenipotentiary Ivan Ya. Korostovets (1862–1933), who concluded the 1912 agreement with the Bogd Khaan government, noted that the Mongols requested not only Russian recognition of "internal autonomy of Khalkha," but also the "external independence of the Mongolian state."[33]

More importantly, in *Elements of International Law* a "sovereign state" is defined as a state that "governs itself independently of foreign powers," and was translated in Chinese as *zizhu zhi guo* 自主之國.[34] In *TUYČ*, *zizhu zhi guo* is rendered as öber-iyen eǰerkekü ulus ("self-governing state"), and its definition is translated as "able to manage its own affairs without obeying the decree (*ǰarliγ* or *čaγaǰa*) of another state."[35] Furthermore, *Wanguo gong* and *TUYČ* contain an explanatory note on "recognition" (Ch. *ren* 認; Mo. *küliyebei*), which does not appear in the English version, explaining "recognition" refers to acknowledging a state as a "self-constituted, self-governing state."[36]

31 The original English is: "Sovereignty is the supreme power by which any State is governed. This supreme power may be exercised either internally or externally." Wheaton, *Elements of International Law*, p. 29; The Chinese translation is: "治國之上權，謂之主權。此上權，或行於內，或行於外。" Huidun, *Wanguo gongfa*, vol. 2, p. 17.

32 The Mongolian translation in the revised manuscript is: "Ulus-i ǰasaqu degedü erke-yi eǰerkekü erke kememüi. Ene kü degedü erke-yi dotuγadu-dur yabuγulqu ba, esekül-e γadaγadu-dur yabuγulqui anu bui amui." *Tümen ulsyn yerdiin tsaaz*, p. 224; The translation in the draft manuscript is almost identical, but renders *eǰerkekü erke* as *eǰen-ü erke*, see *Tümen ulsyn yerdiin tsaaz*, p. 154.

33 Ivan Ya. Korostovets, *Devyat' mesyatsev v mongolii: dnevnik russkogo upolnomochennogo v mongolii avgust 1912–mai 1913 g.* (Ulaanbaatar: Soyombo Printing, 2009), p. 110.

34 The original English is: "A sovereign State is generally defined to be any nation or people, whatever may be the form of its internal constitution, which governs itself independently of foreign powers." Wheaton, *Elements of International Law*, p. 45; The Chinese translation is: "凡有邦國，無論何等國法，若能自治其事，而不聽命於他國，則可謂自主者矣。" Huidun, *Wanguo gongfa*, vol. 2, p. 25.

35 The Mongolian translation in the revised manuscript: "Aliba ulus törü, ulus-un čaγaǰin yamabar ǰerge bolbaču kerebe tegün-ü kereg-i öber-iyen ǰasaǰu čadaγad busud ulus-un ǰarliγ-i ülü daγaqu bolqul-a darui öber-iyen eǰerkebei kemeǰü bulqu bolai." *Tümen ulsyn yerdiin tsaaz*, p. 243. In the draft manuscript, the translation is all the same, except the Chinese *ming* 命 is translated as *čaγaǰa* ("law"). *Tümen ulsyn yerdiin tsaaz*, p. 176.

36 "所謂認者，認其為自立自主之國，而與之往來也。" Huidun, *Wanguo gongfa*, vol. 2, p. 17; "Küliyebei kemekü anu, tegün-ü öbesüben toγtuniqu ba, öbesüben eǰerkekü ulus bolqu-yi küliyekü böged inaγsi činaγsi yabuγulqui anu buyu," *Tümen ulsyn yerdiin tsaaz*, p. 155.

This explanation of "recognition" may have led the Mongols to believe that Russia had recognized their independence, since the phrase "self-constituted, self-governing state" was included in the 1912 agreement.[37] The Mongolian definition of a "self-governing state" likewise shaped the Mongols' understanding that an independent state governs its own affairs without submitting to the authority of others. This can be seen, for instance, in a letter sent by the Mongolian Prime Minister Namnansüren (1878–1919) to the Russian foreign minister on 16 December 1913, when he headed the Mongolian delegation to Russia in late 1913 to early 1914. In this letter, protesting the 1913 Russo–Chinese declaration, Namnansüren stated that Russia and China had recognized that Mongolia could exercise "self-governing with being controlled by others" (Mo. *busadad zakhragdakhgüi ööröö ezerkhekh yos*) in matters such as diplomacy, trade, railways and other affairs.[38] Importantly, in the Russian version of this letter, "self-governing" was translated as *nezavisimost'* ("independence").[39] This translation may have been conducted by Tsyben Zhamtsarano (Jamsrangiin Tseveen, 1881–1942), who served as a translator for the Namnansüren delegation. Indeed, Zhamtsarano's writings indicate that he actively promoted the interpretation of "self-governing" as meaning "independence." For instance, in the first issue of *Šin-e toli kemekü bičig* (New Mirror Journal) in March 1913, he wrote that the Russians had recognized Mongolia as a "self-governing separate state" (*öbertegen eǰerkekü tus ulus*).[40] Here, Zhamtsarano juxtaposed "self-governing" with *tus ulus*, or elsewhere *tusaγar ulus* (both literally "separate state," the latter in modern Mongolian denotes the independent state).

Furthermore, in his later work *Ulus-un erke* (Power of the State), published around 1913–1914, he defined *ulus* ("state") as "a name referring to [a polity] that does not follow the authority of others and whose internal and external,

37 Reading Tachibana's analysis of the Mongols' response to the draft of Russo–Mongolian Agreement presented by Korostovets, it appears that the Mongols did not pay particular attention to the Russian concept of "autonomy," by which the precise relationship between Mongolia and China was not clearly defined. Instead, they repeatedly requested Russian recognition of the Bogd Khaan government's claim to unify Inner Mongolia into its territory. Tachibana, *Bogudo-Hān Seiken no kenkyū*, pp. 104–107.

38 Zorigtyn Lonjid, Gongoryn Dashnyam and Ganbatyn Namnansuren, eds., *Bogd khaant mongol ulsyn yörönkhii said sain noyon khan T. Namnansürengiin khaant oros ulsad 1913–1914 ond khiisen ailchlal: Barimt bichgiin emkhtgel* [The Visit of Prime Minister Sain Noyon Khan T. Namnansüren of the Bogd Khanate of Mongolia to Imperial Russia, 1913–1914: A Collection of Documents] (Ulaanbaatar: Arkhivyn Yörönkhii Gazryn Khevlekh Kheseg, 2010), p. 49.

39 A. Popov, "Tsarskaya Rossiya i Mongoliya v 1913–1914 gg.," *Krasnyni Arkhiv: istoricheskii zhurnal* 37, no. 6 (1929), p. 37.

40 "*Orus mongγul-un ger-e toγtuγaγsan-u učir-a*" [The Reasons for the Conclusion of the Russo–Mongolian Agreement], *Šin-e toli kemekü bičig* [New Mirror Journal], no. 1, 19 March 1913, pp. 20, 22.

great and small affairs are all self-governing (*öbertegen eǰerken*) and separately constituted (*tusaγar toγtuniγsan*)."[41] As mentioned earlier, the Mongolian expression "separately constituted" corresponds to the modern Mongolian term for "independence" (*tusaγar toγtanil*), which is thought to have first appeared during the 1914–1915 Kyakhta tripartite conference. Here, however, the term already appears in Zhamtsarano's work before the conference. I will examine Zhamtsarano's writings further in the next section.

On the contrary, while the Mongols used "self-governing" in the sense of "independence," Mongolian documents produced by the Russian side appear to have used the term to denote "autonomy." For instance, on 4 November 1912, Korostovests sent a note to the Mongolian government stating that the Russian government had recognized the "self-governing organization" (*öber-iyen eǰerkekü yosu*, i.e., autonomous organization) of Mongolia.[42] Likewise, the term *Avtonomnaya Vneshnyaya Mongoliya* ("Autonomous Outer Mongolia"), referring to the territory that later became modern Mongolia, found in 1913 Russo-Chinese Declaration, was rendered as "self-governing Outer Mongolia" (*öbertegen eǰerkegsen qadaqadu mongγul*).[43]

The Mongols became aware of that their term "self-governing" was being equated with "autonomy" (Ru. *avtonomiya*, Ch. *zizhi* 自治) and that their international political status was placed under Chinese suzerainty during the Kyakhta Tripartite Conference (September 1914–June 1915).[44] From the outset of the conference, the Mongolian delegates insisted that they were already "self-governing" by the establishment of the 1912 agreement and repeatedly rejected the Chinese "limited governing" (*kemǰiy-e-tei eǰerkekü* or *kemǰiy-e-tei eǰerkelge, i.e. suzerainty*).[45] Instead of "self-governing," the Chinese delegates even pushed their own Mongolian term, rendering "autonomy" (Ch. *zizhi* 自治) as "self-managing" (Mo. *öber-iyen ǰasaqu*). The Mongolian delegates rejected this term, fearing that such terminology would cause Mongolia to "lose external power

41 The original sentence is: "Ulus kemegči olan kümün-ner neyileǰü nigen γaǰar-a orusin öber-iyen ǰakiruγdaǰu, busud-un erke-yi ülü daγaqu, dotuγadu γadaγadu yeke baγ-a kereg-i čöm öbertegen eǰerken tusaγar toγtuniγsan-u ner-e." Tsyben Zhamtsarano (J̌imsarang-un Čeveng), *Ulus-un erke* [Power of the State], recorded by Delignima (Urga: Russko-Mongol'skaya tipographiya, n.d.), p. 44.

42 MUÜTA (Mongol Ulsyn Ündesnii Töv Arkhiv, National Central Archives of Mongolia), fond [holdings] A2, dans [roster] 1, khadgalamjiin negj [storage unit] 79, nugalbar [Folded Document] 1. Cyrillic transcription in Emgent Ookhnoin Batsaikhan, ed., *Mongolyn tüükhiin ekh survalj (1911–1921)* [The Original Sources of Mongolian History (1911–1921)] (Ulaanbaatar: Soyombo Printing, 2013), p. 182.

43 MUÜTA, fond A4, dans 1, khadgalamjiin negj 163, nugalbar 4.

44 Tachibana, "Somewhere Between 'Independence' and 'Autonomy'," pp. 188–196.

45 O. Batsaikhan, ed., *Khyatad, oros, mongol gurvan ulsyn 1915 ony khiagtyn geree (ödör tutmyn temdeglel): barimt bichgiin emkhtgel* [Sino–Russo–Mongolian 1915 Kyakhta Tripartite Agreement (Conference Minutes): A Collection of Documents] (Ulaanbaatar: Soyombo Printing, 2013), pp. 28, 33, 35, 38.

and retain only a small degree of internal power," and insisted on using "self-governing."[46] Beginning with the 11th session of the conference (30 October 1914), the Mongolian delegates finally began to accept the Russian and Chinese interpretation that their "self-governing" status as an autonomy. This shift can be seen in the Mongolian minutes, in which "autonomy" was rendered in Mongolian as *abdonomi* and juxtapositioned with "self-governing" (*öbertegen eǰerkekü*).[47] Nevertheless, until the end of the conference the Mongolian delegates continued to use the term "self-governing" in order to extend their political status as far as possible. The Chinese delegates, by contrast, consistently pushed their own Mongolian terms for "suzerainty" (*uγ eǰen-ü erke*) and "autonomy" (*öber-iyen ǰasaqu*).[48] Ultimately, in the Mongolian version of the 1915 Kyakhta Tripartite Agreement, these terms were rendered in Mongolian following the French pronunciation as *süǰeriniteyed* and *avtonomi*.[49] This choice postponed the clarification of these concepts and allowed the Mongols to maintain the meaning of the "self-governing" as "independence." Indeed, in their report to the Bogd Khaan, the Mongolian delegates explained that "it is a common international behavior that the wording of treaties is written in an obscure manner in each party's script, and that the meanings are later interpreted in each state's own language." They further emphasized that by accepting Chinese suzerainty (*kemǰiy-e-tei eǰerkekü*), "there was absolutely no loss of the status of the state or our rights" (*ulus törü-yin činar ba erke-yi aldaγdaγsan yabudal oγtu ügei*).[50]

Thus, even after 1915, the term "self-governing" continued to be used to emphasize Mongolia's independent status rather than autonomy. For instance, after the establishment of the Mongolian People's Government following the 1921 Mongolian (People's) Revolution, in a note sent by Prime Minister Bodoo to Soviet Russia on 10 September 1921, he stated that Mongolia had retaken "self-governing power" (*öörtöö ezerkhekh erkh*). Four days later, he announced internationally that Mongolia would never again accept Chinese suzerainty

46 *Khyatad, oros, mongol gurvan ulsyn 1915 ony khiagtyn geree,* p. 43. One of the Inner Mongolian translators worked for the Chinese delegation was Fuhai (Mongolian name is Rashdonrov), who had previously worked for Buryat court physician Pyotr Badmaev in Chita in 1890s. See Bailadugeqi 白拉都格其 [Baildagchi], "Fuhai yu qingmo minchu Neimenggu dongbu zhengju bianhua 阜海与清末民初内蒙古东部政局变化 [Fuhai and the Changing Political Situation in the Late Qing and Early Republican Peirod]," *Journal of Inner Mongolia University*, no. 1 (1997), pp. 16–26.

47 MUÜTA, fond A4, dans 1, khadgalamjiin negj 251, bichig 7.

48 *Khyatad, oros, mongol gurvan ulsyn 1915 ony khiagtyn geree*, pp. 218–221.

49 Batsaikhan, *Mongolyn süülchiin ezen khaan VIII bogd javzandamba*, p. 646. Tachibana, "Somewhere Between 'Independence' and 'Autonomy'," p. 196.

50 MUÜTA, fond A4, dans 1, khadgalamjiin negj 281, *Dumdadu orus mongγul-un ger-e bičig-ün udq-a činar-i tayilburilaγsan debter* [The Document Explaining the Content and Nature of the Sino–Russo–Mongolian Agreement], pp. 5, 12. Cyrillic version of this report see Batsaikhan, *Mongolyn süülchiin ezen khaan VIII bogd javzandamba*, pp. 469–482.

(*Khyatadyn syuzerenitet*) and hence that the Mongols would "govern themselves" (*ööröö ezerkhen*) under the People's Government.[51] Furthermore, later, in a document (30 November 1922) sent by Mongolian Foreign Minister Tserendorj to N. M. Lyubarsky, the Russian representative in Mongolia, protesting the Sino–Soviet negotiations concerning the Chinese sovereignty over Mongolia, he stated that any information claiming that Mongolia would be granted autonomous rights (*avtonomit erkh*) must be false rumors fabricated by those unwilling to see Mongolia enjoy the "full power of self-governing" (*öörtöö ezerkhekh büren erkh*).[52] It is important to note that in this document the term "self-governing" appears together with the expression "full power," which marks the emergence of the modern Mongolian concept of sovereignty. I will further examine the expression "full power" in fourth section of this paper.

3. Zhamtsarano's Introduction of "Sovereignty" as *Degedü Erke* ("Supreme Power")

In the previous section, I argued that the Buryat-Mongol intellectual Tsyben Zhamtsarano played an important role in reinforcing the interpretation of the term "self-governing" as meaning independence. Indeed, more than the translation of *TUYČ*, Zhamtsarano's writings greatly contributed to the introduction of Western political concepts into Mongolia in the early 1910s, and many of the terms he created are still used in modern Mongolian.[53] This section examines Zhamtsarano's introduction of the concept of "sovereignty" through the term *degedü erke*, which literally means "supreme/highest power" in the 1910s.

A brief introduction to Zhamtsarano is in order. He was trained at the Imperial University of St. Peterburg, and conducted ethnographic expeditions and traveled across Buryatia, Khalkha (Outer) Mongolia and Inner Mongolia during 1903–1910. These experiences prompted him to contribute to the

51 *Dogsomyn Bodoo (Khelsen, bichsen züiliin tüüver)* [Dogsomyn Bodoo (A Collection of Speeches and Writings)] (Ulaanbaatar: Shinjlekh Ukhaany Akademiin Tüükhiin Khüreelen, 2001), pp. 67, 70.

52 See the document quoted in Lkhamsüren, *Mongolyn gadaad orchin töriin tusgaar togtnol*, pp. 42–43, and Aoki, *Mongoru kingendaishi kenkyū: 1921–1924*, pp. 172–173.

53 For the fundamental studies on Zhamtsarano, see Robert A. Rupen, "Cyben Žamcaranovič Žamcarano (1880–?1940)," *Harvard Journal of Asiatic Studies*, no. 19 (1956), pp. 126–145; B. Tsybikov and Sh. Chimitdorzhiev, *Tsyben Zhamtsarano* (Ulan-Ude 1997); Jambalyn Tsetsegmaa, *Mongolyn ankhany doctor Jamsrangiin Tseveen* (Ulaanbaatar: Mönkhiin üseg, 2023). On Zhamtsarano's contribution to the formation of the modern Mongolian terminology, see Zumebr Orluud ウルルード・ズンベル, "Mongorukoku niokeru mongorugo kindai jutsugo no keisei: Bogudo-Hān seiken kara Mongoru jinmin kyōwakoku makki made モンゴル国におけるモンゴル語近代術語の形成 : ボグド・ハーン政権からモンゴル人民共和国末期まで [The Formation of Modern Mongolian Terminology in Mongolia: From the Bogd Khaan Government to the Late Mongolian People's Republic]," (PhD diss., Showa Women's University, 2024).

national development of the Mongols.[54] He arrived in Outer Mongolia in late 1911, shortly after the declaration of Mongolian independence. In 1912 he contributed to the establishment of Mongolia's first publishing house in the new capital Niislel Khüree (now Ulaanbaatar), through which he later published his journals and books until the late 1910s.[55] His publications, which introduced a wide range of modern knowledge including politics, geography and astronomy, were influential not only in Mongolia but also in contemporary Buryatia.[56] In 1914–1915, Zhamtsarano served as a translator for the diplomatic negotiations of the Bogd Khaan government, such as Namnansüren delegation to Russia and the Kyakhta tripartite conference.[57]

Zhamtsarano discussed the concept of *degedü erke* in three works. The first, which became the basis for the latter two, is a handwritten notebook (22×17.5 cm, 82 sheets) and the contents were recorded from 14 December 1909 to 11 January 1910 during his expedition to Inner Mongolia.[58] In this work, he defines *degedü erke* as follows:

> "Within a state, the power to enact and enforce laws is called 'supreme power' (Mo. *degedü erke*), referred to as *süvirinideyed* in other languages. […] Within a state, if this supreme power is vested in a single person, that person is called an 'unlimited monarch' (Mo. *ese kemǰiyelegdegsen eǰen*). […], or the one who 'holds in his own hand' (*mutur-taγan bariγči*). […] When the representatives who selected by the masses assemble and exercise supreme power, […] the state governed by such selected persons is called a republic (*risfübliγ*)."[59]

54 For instance, in his diary noted in 1904 journey, he expressed sorrow that while humanity had already invented railways, telephones, and airlines, the Mongols were still trying to produce two-wheeled ox carts. See *Jamsrangiin Tseveenii zamyn temdeglelüüd (1903–1910 on)* [Travel Diary of Jamsrangiin Tseveen], trans., D. Badamnyam (Ulaanbaatar: Admon, 2014), p. 144.

55 A recent study on the publishing house in Niislel Khüree and Zhamtsarano's journals, see M. Odmandakh, *Mongolyn ankhny togtmol khevleliin tüükhiin sudalgaa* [A Study of the History of Mongolia's First Periodical Press] (Ulaanbaatar: Jikom Press, 2021).

56 *Buriyad mongγul-un ünen* (*Buryat-Mongol'skay pravda*), no. 35 (237), 11 May 1928, p. 2.

57 The Mongolian minutes of the Kyakhta tripartite conference were recorded by him. See *Khyatad, oros, mongol gurvan ulsyn 1915 ony khiagtyn geree*, p. 143.

58 MUÜTA, khuviin fond 31, dans 1, khadgalamjiin negj 1, *Orus-un albatu aquyin buriyad zeveng ǰimtsaran-u bičig: yirtinčü-yin bayidal, delekei-yin bayidal, 2 duγar debter* [The Notebook of the Russian Subject, the Aga-Buryat Tsyben Zhamtsarano: The State of the Universe and the World]. It appears that this notebook was a draft of his geography textbook, which was later published in 1915–1918 under the title *Orčilang-tu yirtinčü-yin bayidal* [Cosmography] in Niislel Khüree. For an introduction to this notebook, see Zumber, "Mongorukoku niokeru mongorugo kindai jutsugo no keisei," pp. 38–39.

59 The original sentence is: "Gürün dotur-a qauli qarqaqu ba qauli qadaqalaqu erke tegüni degedü erke kememüi. Busu keleber süvirinideyed. […] Gürün dotur-a degedü erke inü nigen kümün-dü tušiyaγsan bögesü tere kümün-i ese kemǰiyelegdegsen eǰen kememüi. […] Basa mutur-taγan bariγči kememüi. […] olan-iyar songquγsan kümün-nügüd čiqulǰu degedü erke-yi edlemüi. […] eyimü songqulta-yin kümün-iyer törü-ben baridaγ gürün tegüni-yi risfübliγ kemekü." MUÜTA, khuviin fond 31, dans 1, khadgalamjiin negj 1, pp. 81–82.

Here, Zhamtsarano defined *degedü erke* as the power to enact and enforce laws, and clearly wrote that this term corresponds to *süvirinideyed* ("sovereignty"). He further wrote that if this power is vested in a single person, that person would be called an "unlimited monarch" or the one who "holds in his own hand" (*mutur-taγan bariγči*). Regarding the latter expression, in a 1913 Russo–Mongolian dictionary, samoderzhets ("autocrat") is translated into Mongolian as *ubra barigchi* (in modern spelling *ööröö barigchi*, literally "self-holder").[60] Thus, it may be assumed that the term *mutur-taγan bariγči* likewise signifies an "autocrat." It is therefore possible that the term *degedü erke* was a direct translation of Russian *verkhovnaya vlast'* ("supreme power"), a concept closely linked to Tsarist autocracy.[61]

The second work was *Šin-e toli kemekü bičig* (New Mirror Journal), the nation's first journal published by Zhamtsarano on 19 March 1913. In this journal Zhamtsarano introduced *degedü erke* as "a power which governs the whole state entirely" (*Bükü ulus-i yerüngkeyilen ǰasaqu erke*).[62] Almost identically to the above-mentioned notebook, he further explained that if *degedü erke* were vested in a single person, the system would be called "autocracy" (*kemǰiy-e ügei erke-tü törü*); if it were vested in representatives elected by the masses, it would be called a "republic" (*bügüde nayiramdaqu ulus*); and if it were divided between a monarch and elected representatives, it would be called a "constitutional monarchy" (*kemǰiyelegsen qauli-tu törü*).[63] The term *degedü erke* was also used in this journal when referencing the abdication of the Qing Emperor, writing that the Manchu emperor had "transferred the *degedü erke* to the whole state (*bükü ulus*)."[64]

The third work in which Zhamtsarano discussed *degedü erke* in greater detail is a book titled *Ulus-un erke* (Power of the State), which discusses territory, parliament, and citizens' rights.[65] This book was written at the request of the Mongolian Prime Minister Namnansüren and published by the publishing house in Niislel Khüree. The exact publication date is not given,

60 R. Bimbaev, *Russko–Mongol'skii slovar': Razgovornogo yazyka na Khalkhasskom narechii* (Troitskosavsk: Tipografiya A. A. Lushnikova, 1913), p. 297.

61 It is considered that the concept of sovereignty within the early 20th century Russian Empire was closely associated with Tsarist autocracy, see Aoshima Yoko 青島陽子, "Roshia Teikoku: Sensei, shinmin, ryōiki ロシア帝国:専制・臣民・領域 [The Russian Empire: Autocracy, Subjects, and Territory]," in Nakazawa Tatsuya 中澤達哉 , ed., *Shuken kokka saikō: Kindai wo yomikaeru*「主権国家」再考:近代を読み替える ["Sovereign State" Reconsidered: Reinterpreting Modernity] (Tokyo: Iwanami Shoten, 2025), pp. 101–118.

62 *Šin-e toli kemekü bičig*, no. 1, p. 19.

63 *Šin-e toli kemekü bičig*, no. 1, p. 19.

64 *Šin-e toli kemekü bičig*, no. 1, p. 20.

65 Tsyben Zhamtsarano (J̌imsarang-un Čeveng), *Ulus-un erke* [Power of the State], recorded by Delignima, Russko–mongol'skaya tipografiya v Urge, n. d., 75 pages. This work was later republished in the early 1920s by the Mongolian People's Party's Central Committee.

but it was possibly published around 1913–1914.[66] In this work, *degedü erke* is defined "the powers of administering, governing, defending, representing a state, and conducting relations with foreign countries," and is described as almost equivalent to the "power of the state's emperor" (*ulus-un eǰen-ü erke*).[67] Zhamtsarano also discussed its close relationship with state territory. He first argued that "if there is no territory (*γaǰar orun*), there is no state. If the state perishes, the state's territory would disappear. [Thus] state's territory is undoubtedly a symbol of a state that is self-governing and self-constituted (*öbertegen eǰerken öbertegen toγtuniγsan*)."[68] He then further argued that:

> "The state's *degedü erke* is fully exercised and governs over the state's territory. If the state's *degedü erke* cannot be fully exercised over the state's territory, or if this power has been taken by other states, then the state cannot be considered fully self-governing and constituted (*öbertegen eǰerkeǰü toγtunin*)."[69]

Here, by employing the term "self-governing" discussed in the previous section, Zhamtsarano clearly associated the concept of *degedü erke* with territorial control and external independence. Records of the 1913–1914 Namnansüren delegation to Russia indicate that this term had entered the contemporary usage of the Mongolian bureaucracy. For instance, on 14 November 1913, the delegation reported to the Mongolian government that a Russian newspaper had written that "Russia and China had concluded an agreement vesting the

66 Tanaka Katsukiho suggested that it was Zhamtsarano's experience at the 1915 Kyakhta tripartite conference that prompted him to write this work in order to deepen Mongolian understanding of modern statehood. See Tanaka Katsukiho 田中克彦, *Sōgen no kakumeika tachi: Mongoru dokuritsu e no michi (zōho kaiteiban)* 草原の革命家たち:モンゴル独立への道（増補改訂版）[Revolutionaries of the Steppe: The Path to the Mongolian Independence (Revised and Expanded Edition)] (Tokyo: Chuokoronsha, 1990), pp. 197–198. However, the book ends with a phrase "May the new state (*tulγur törü*) of Mongolia prosper," which would have been inappropriate if it had been written after Mongolia lost its independence after 1915. Furthermore, the book uses the phrase "self-governing, self-constituted" to convey the idea of "independence." It therefore seems unlikely that Zhamtsarano would have used this phrase after 1915, when it had come to be equated to "autonomous."

67 The original sentence is "Ulus-un degedü erke kemebesü ulus-i ǰasaqu, ulus-i ǰakirqu, ulus-i qamaγalaqu, ulus-i tölügečilekü, γadaγadu-luγ-a qarilčaqu ǰerge-yin erke-nuγud bolai. Ulus-un eǰen-ü erke inü mön ulus-un degedü erke-lüge baruγ tölüb neyilekü." Zhamtsarano, *Ulus-un erke*, p. 46.

68 Zhamtsarano, *Ulus-un erke*, p. 44.

69 The original sentence is "Ulus-un degedü erke-yi ulus-un qariyatu γaǰar orun deger-e bürin-e yabuγulun eǰerkekü bolai. Kerbe qariyatu γaǰar orun-a ulus-un degedü erke-yi güičed yabuγulun ülü čidaqu ba, esegül-e enekü erke-yi busud ulus eǰerken abuγsan anu bui abasu, ulus bürin bütün öbertegen eǰerkeǰü toγtunin čidaγadui anu mön bolai." Zhamtsarano, *Ulus-un erke*, pp. 44–45.

degedü erke of our Outer Mongolia in China."[70] Similarly, in a conversation on 5 December with G. A. Kozakov, the head of the Far Eastern Department of the Russian Foreign Ministry, the Mongolian delegates referred to the unification of Inner Mongolia under the Bogd Khaan government as "fully taking its [Inner Mongolia's] *degedü erke*."[71]

By the late 1910s and early 1920s the term *degedü erke* had become an established expression in both Outer Mongolia and Buryatia. During this period, its meaning emphasized supreme authority within a region or state, rather than external independence.[72] For instance, when Mongolian translators attempted to translate the 1918 Constitution of Soviet Russia in the early 1920s, *degedü erke* was used to render Russian *verkhovnaya vlast'*, referring to the supreme power vested in the All-Russian Congress of Soviets.[73] Similarly, in the Chapter 1, Article 1 of 1924 Mongolian Constitution (discussed in more detail in next section), *degedü erke* referred to the highest authority vested in the State Great Khural (State Congress) following the Soviet model, rather than to the notion of sovereignty.[74]

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70 *Bogd khaant mongol ulsyn yörönkhii said sain noyon khan T. Namnansürengiin khaant oros ulsad 1913–1914 ond khiisen ailchlal*, p. 36.

71 *Bogd khaant mongol ulsyn yörönkhii said sain noyon khan T. Namnansürengiin khaant oros ulsad 1913–1914 ond khiisen ailchlal*, pp. 22–23. For details of this conversation, see Tachibana, *Bogudo-Hān Seiken no kenkyū*, pp. 349–351; Idem, *Mongolyn martagdsan tüükh*, pp. 334–335. However, I didn't find the term *degedü erke* is mentioned in the Mongolian minutes of 1914–1915 Kyakhta tripartite conference.

72 For instance, a Mongolian journal published in Buryatia, referencing to the establishment of the Siberian Regional Duma in Tomsk (*Sibiri-yin düüm-a*) in January 1918, describes its supreme legislative power as *degedü erke*. See, "Toomsḳa kemekü qotan-a toγtuγsan sibiri-yin oblastnoi soviid kemekü degedü jöbdel-ün γaǰača," *Qamturan ködülmüril-ün üge kemekü mongγul buriyad-un debter sonin* [The Mongol Buryat Journal Named Cooperative Word], no. 1, 2 January 1918, p. 9; Also, in the famous *Mongγul-un ünen* (Trtuth) newspaper in the late 1920, it described the Jebtsundamba Khutughtu as holding the *degedü erke* of the Mongolian state. See, E. Bilgüün-Orgil, Ts. Odbat and Ch. Önörjargal, eds., *Mongγul-un ünen* (*Mongol'skaya pravda*), no. 3, 20 December 1920, p. 2, in *Mongolyn ünen: 1920–1921 ond khevlegdsen ankhny zurgaan dugaaryn emkhetgel* [Mongolyn ünen: A Collection of the First Six Issues Published in 1920–1921] (Ulaanbaatar: Ünen, Strategi Akademi, 2023), p. 90.

73 J. Amarsanaa, B. Bayarsaikhan and R. Shajinbat, eds., *Olon ulsyn ündsen khuuliin orshil: ankhdugaar ündsen khuuliin sudalgaany ekh survalj* [Introduction to the Constitutions of Various Countries: Original Sources for the Study of the First Constitution] (Ulaanbaatar: Khuuli Züin Ündesnii Khüreelen, 2009), pp. 62, 267.

74 J. Amarsanaa, O. Batsaikha and L. Tur-Od, eds., *The Constitutions of Mongolia 1924·1940·1960·1992* (Ulaanbaatar: Munkhiin Usug Group, 2009), p. 24; Ivan Sablin, Jargal Badagarov and Irina Sodnomova, "Kural Democracy: Imperial Transformations and the Making of the First Mongolian Constitution, 1911–1924," in Simon Wickhamsmith and Phillip P. Marzluf, eds., *Socialist and Post-Socialist: Nation, Identity, and Culture* (London: Routledge, 2021), pp. 14, 35.

4. *Bürin erke* ("Full Power"): The Emergence of a Mongolian Concept of Sovereignty

The modern Mongolian term for "sovereignty," *bürin erke* ("full power") or *bürin erketü bayidal* ("a state of possessing full power"), did not derive either from "self-governing" or from *degedü erke*. How, then, did this term take shape? This section examines the early formation and usage of this term.

A related expression, *bürin-e eǰerkekü* ("fully governing"), first appeared when the Mongols responded to the 1913 Russo–Chinese negotiations concerning Chinese suzerainty over Mongolia is important. As I have already quoted in first section of this paper, believing that the 1912 Russo–Mongolian agreement had already granted them an independent ("self-governing") status, on 25 April 1913 the Mongolian government sent a note to Korostovets protesting that Mongolia had already been constituted as a "fully governing state" (*bürin-e eǰerkekü ulus törü*) and Russia had recognized it.[75]

The very term "*bürin erke*" began to take shape during the 1914–1915 Kyakhta tripartite conference, when the Russian delegates explained to the Mongolian delegates that becoming an autonomy under Chinese suzerainty would mean being a "small state with half power." This exchange is recorded in a telegram sent by the Mongolian delegation to their government:

> The Russian delegate said: "If we [Russia and China] write [the terms] as you [Mongolia] suggest, it would make you appear as a fully governing great state (*bürin eǰerkekü yeke ulus*). Since you are going to become a small state with half power (*qaγas erke-tei baγ-a ulus*) under Chinese suzerainty (*Kitad-un kemǰiy-e-tei eǰerkelge*, 'limited-governing of China'), you should write as I suggest."[76]

This explanation shaped the Mongolian understanding that being under Chinese suzerainty meant becoming a state with only half power. During the 10th session of the conference (26 September 1914), the Mongolian delegates' reference to a "state with half power" was recorded in the Russian minutes as *polusuverennoe gosudarstvo* ("semi-sovereign state").[77] Furthermore, in another telegramme sent by the Mongolian delegation to their government after the 12th session (5 November 1914), the Mongols used the term "full power" for the first time:

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75 Tachibana, *Bogudo-Hān Seiken no kenkyū*, p. 341; Idem, *Mongolyn martagdsan tüükh*, p. 324. An identical note was published in *New Mirror Journal*, where the expressions *bürin-e eǰerkekü ulus* ("fully-governing state") and *bürin-e eǰerkekü tusa ulus* ("fully-governing sperate state") were also used. See *Šin-e toli kemekü bičig*, no. 3, 20 May 1913, pp. 41–44.

76 MUÜTA, fond 4, dans 1, khadgalamjiin negj 38, p. 121. Cyrillic transcription in *Khyatad, oros, mongol gurvan ulsyn 1915 ony khiagtyn geree*, p. 73.

77 *Khyatad, oros, mongol gurvan ulsyn 1915 ony khiagtyn geree*, pp. 78, 268.

> The Russian delegate said "Our Russia […] cannot allow Outer Mongolia to become a state with full power (*bürin erke-tei ulus*) not ruled by China, therefore we have decided to let you [the Mongols] accept Chinese suzerainty. Thus, you Outer Mongolia will certainly become a state with half power (*qayas erke-tei ulus*)."[78]

Here, the Russia delegate clearly stated Mongolia had to become a state with "half power" rather than "full power." As above shown, if "a state with half power" was corresponded to a "semi-sovereign state," then logically this "a state with full power" should correspond to a "sovereign state." However, as I will examine below, it remains unclear whether the Mongols at this time directly understood "full power" as "sovereignty." Nevertheless, it is important to note that the Mongols' conceptualizing "autonomy" as "half power" contributed to the emergence of the term "full power" (*bürin erke*). And through this process, they began to realize that being a genuine independent state is to become "a state with full power."

Then, what was the exact meaning of the term "full power," and what did this term imply? After 1915, the earliest source currently available to me in which "full power" is used is the journal *Mongγul buriyad-un sanal* (Views of Mongol Buryat), published on 15 April 1919 in Chita during the pan-Mongolist movement led by Buryat-Mongols.[79] In this journal, Mongolia is consistently described as a *bürin erketü ulus* ("state with full power") or a *bürin erketü tusaγar ulus* ("fully powered independent state").[80] For instance, in the first article entitled "*Bürin erketü mongγul ulus*" ("Fully Powered Mongol State"), the author states that Mongolia had been a "fully powered independent state" since ancient times, and argued that in 1911 the Mongols declared themselves to be a "fully powered independent state" in accordance with international law (*olan*

78 MUÜTA, fond 4, dans 1, khadgalamjiin negj 38, p. 156. Cyrillic transcription in *Khyatad, oros, mongol gurvan ulsyn 1915 ony khiagtyn geree*, p. 88.

79 Based at Dauria station in the Transbaikal region, this movement aimed to establish a unified Mongolian federation encompassing Buryatia, Outer Mongolia, Inner Mongolia and Hulun Buir. It was initially started by the Mongols of Hulun Buir and involved the Buryat-Mongols who pursuing their own autonomy with the support of a White leader G. M. Semenov. The Khalkha Mongols did not directly participate in this movement. Inspired by U.S. President Woodrow Wilson's 1918 principle of self-determination, a provisional government was established in February 1919. This movement ended in failure later the same year. For details, see Futaki Hiroshi 二木博史, "Dai-Mongoru-koku rinji seifu no seiritsu 大モンゴル国臨時政府の成立 [The Establishment of the Provisional Government of Greater Mongolia]," *Area and Culture Studies (Tokyo University of Foreign Studies)* 東京外国語大学論集 54 (1997), pp. 37–58; Tachibana Makoto 橘誠, "Minzuku jiketsu shugi to Mongoru no unmei: Jichi teppai e no michinori 民族自決主義とモンゴルの運命：自治撤廃への道程 [The Self-Determination and the Fate of Mongolia: The Path to the Revocation of Autonomy]," *Shimonoseki Shiritsu Daigaku Ronshū* 下関市立大学論集 64 (2020), pp. 63–75.

80 *Mongγul buriyad-un sanal* [Views of Mongol Buryat], no. 1, 17 April 1919, pp. 6, 8, 10–11, 13, 15–19, 21–24.

ulus-un qauli), further notes that the goal of the 1919 movement was to establish such a "fully powered independent state."[81]

To understand what "fully powered" meant, it is necessary to examine the writings of one of the key figures behind the journal's publication, Elbek-Dorzhi Rinchino (1888–1938), a Buryat-Mongol intellectual who later played an important role in the 1921 Mongolian Revolution.[82] In his Russian writings, when referring to the aims of the 1911 Mongolian independence and pan-Mongolist movement, Rinchino uses the term *nezavisimost'* ("independence"), but does not mention expressions corresponding to "sovereignty."[83] This suggests that the "fully powered" was used to convey an idea of "independent," and that such expression had already become established among Buryat-Mongol intellectuals by the late 1910s. The usage of "fully powered" possibly was shaped largely by the consequences of the 1915 Kyakhta Tripartite Agreement and the Khalkha Mongols' conceptualization of Outer Mongolia's autonomy under Chinese suzerainty as a "half power" was likely shared by Buryat-Mongols as well. As Rinchino noted, the 1915 agreement concerned "the national interest not only of Buryat-Mongol but all Mongolian tribes."[84]

By the time of the 1921 Mongolian Revolution, the term "full power" had already entered the Mongolian bureaucracy. To my knowledge, the earliest use of this term appears in the previously mentioned note sent by Prime Minister Bodoo to Soviet Russia on 10 September 1921, in which he stated that the people of Mongolia had shown to the world that they could establish an "independent state with full power" (*tusgaar togtnokh büren erkhtei uls*).[85]

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81 Subudi, "*Bürin erketü mongγul ulus*," *Mongγul buriyad-un sanal*, no. 1, 17 April 1919, pp. 8–14. The author, Subudi, likely a pen name of Dashi Sampilon (1891–1938), the chairman of Burnarduma (Peoples Duma of the Buryat-Mongols of Eastern Siberia). See Futaki, "Dai-Mongoru-koku rinji seifu no seiritsu," p. 50.

82 On Rinchino's role on Mongolian political history in the early 1920s, see Futaki Hiroshi 二木博史, "Rinchino to Mongoru kakumei リンチノとモンゴル革命 [Rinchino and The Mongolian Revolution]," *Area and Culture Studies (Tokyo University of Foreign Studies)* 51 (1995), pp. 243–259; Aoki Masahiro 青木雅浩 , "Erubegudoruji Rinchino (1888–1938) エルベドルジ・リンチノ（一八八八〜一九三八） [Elbegdorj Rinchino (1888–1938)]," in Kang Sang-jung 姜尚中, ed., *Ajia jinbutsushi, dai 10-kan: Minzoku kaihō no yume* アジア人物史第 10 巻：民族解放の夢 [Histories of Asian Figures, vol. 10: Dreams of National Liberation] (Tokyo: Shueisha, 2023), pp. 486–505.

83 See Rinchino's "Tekushchii moment," "Velikie derzhavy i nezavisimost' Mongolii," "Pis'mo Dashi Sampilonuy," in R. D. Nimaev, B. B. Batuev, S. B. Ochirov and D.–N. T. Radnaev, eds., *Elbek-Dorzhi Rinchino: Dokumenty, stat'i, pis'ma* (Ulan-Ude: Redaktsionno-izdatel'skii otdel Minpechati Respubliki Buryatiya, 1994), pp. 108–126; "K istorii panmongol'skogo dvizheniya i roli v nem E.–D. Rinchino," in B. V. Bazarov, B. D. Tsibikov and S. B. Ochirov, eds., *Elbek-Dorzhi Rinchino o Mongolii* (Ulan-Ude: Institut mongolovedeniya, buddologii i tibetologii, 1998), pp. 213–250.

84 Rinchino, *Dokumenty, stat'i, pis'ma*, p. 170. Also quoted in Futaki, "Dai-Mongoru-koku rinji seifu no seiritsu," p. 40.

85 *Dogsomyn Bodoo (Khelsen, bichsen züiliin tüüver)*, p. 67.

To clarify the meaning of this "full power," the Mongolian and Russian minutes of the Russo–Mongolian conference held from 26 October 1921 to 5 November 1921 are helpful.[86] In the 1st session (26 October 1921), the head of the Mongolian delegation, Danzan, stated that "after the 1911 Chinese Revolution, the Mongols had gained the full power to become an independent state, [… however, Russia and China] refused [to allow Mongolia] to become an independent state with full power (Mo. *bürin erke-tei tusaγar-a ulus*)."[87] In the corresponding Russian minutes, these two references to "full power" are rendered as *parvo na samoopredelenie* ("right of self-determination") and *nezavisimost'* ("independence"), respectively.[88] More interestingly, in the 4th session (31 October 1921), in the Russian minute recorded Danzan's statement that "it is the sovereign right (Ru. *soverennye prava*) of the Mongolian Government to grant or refuse concessions." In the corresponding Mongolian minute, however, the expression "sovereign right of the Mongolian government" was rendered as "under the jurisdiction (Jp. *kankatsu* 管轄) of the Mongolian government."[89] These minutes therefore demonstrate that the term "full power" did not denote "sovereignty," but instead conveyed a meaning of "independence" as appeared in Rinchino's writings.

From 1923, the term "full power" became an important expression used to assert Mongolia's independent status. Namely, it became particularly prominent in the Mongolian response to the Russo–Chinese negotiation which ultimately resulted in the conclusion of the Sino-Soviet Agreement of 31 May 1924, by which Soviet Russia recognized Chinese sovereignty over (Outer) Mongolia.[90]

The first Mongolian response to the negotiations, as mentioned earlier in second section of this paper, was a document (dated 30 November 1922) sent by the Mongolian Foreign Minister Tserendorj to the Russian representative in Mongolia Lyubarsky, confirming the rumors about the Sino–Soviet negotiations. In this document he protested the negotiations, but did not directly refer to

86 Through this conference a Russo–Mongolian Agreement was concluded on 5 November 1921, by which the two sides recognized each other's governments. For the details of the negotiation, see Aoki, *Mongoru kingendaishi kenkyū: 1921–1924*, pp. 50–60.

87 G. Dashnyam and Kh. Tümenbayar, eds., *Oros–mongolyn nairamdlyn geree 1921.11.05 (barimt bichgiin emkhetgel)* [The Russo–Mongolian Agreement 1921.11.05: A Collection of Documents] (Ulaanbaatar: Bembi San, 2021), pp. 128–129.

88 *Oros–mongolyn nairamdlyn geree 1921.11.05 (barimt bichgiin emkhetgel),* p. 58.

89 Aoki, *Mongoru kingendaishi kenkyū: 1921–1924*, p. 54. The published documents I used does not contain the original Mongolian minute of the 4th session but provides a Mongolian translation based on the Russian minute, rendering "*soverennye prava*" in modern Mongolian as *büren erkh*. See, *Oros-mongolyn nairamdlyn geree 1921.11.05*, p. 41.

90 It is unclear that whether a Mongolian version of this agreement exists. Many Mongolian literatures that refer to this agreement use a modern Mongolian translation of the Russian text, which, of course, renders the term "sovereignty" in modern Mongolian term "*büren erkh*." See M. Batchimeg, ed., *Oros-Khyatadyn geree, kheleltseerüüdiin emkhtgel: negdügeer kheseg /1689–1949 on/* [A Collection of Russo–Chinese Treaties and Agreements: Part One /1689–1949/] (Ulaanbaatar: T&U, 2001), p. 149.

their specific contents.[91] The details of the negotiations were later reported to the Mongolian government through a report by S. I. Dukhovskii, head of the Far-Eastern Department of Soviet Russian People's Commissar of Foreign Affairs, to the Mongolian representative Meiren Davaa in Moscow on 29 October 1923. According to Davaa's report, the Soviet delegate L. M. Karakhan had met with the Chinese representative Wang Chengting and asked whether China would agree to begin negotiations by which Outer Mongolia would accept "self-governing power" (*öörtöö ezerkhekh erkh*) together with Chinese "limited-governing" (*khemjeetei ezerkhekh*).[92] Here, Chinese sovereignty was expressed in Mongolian as "limited-governing," which corresponds to the Mongolian rendering of "suzerainty" used in the 1910s. Aoki Masahiro argued that presenting "sovereignty" to the Mongols "limited-governing" was a Russian diplomatic strategy to restrict the scope of Chinese sovereignty.[93]

In November 1923, protesting Dukhovskii's report, the Mongolian government presented five demands to the Chinese government. The first demand required that the Chinese government "recognize that Mongolia as an independent state with full power (*büren erkhtei tusgaar togtnoson ulus*)."[94] In Russian version, however, this demand was rendered as *priznaniya nezavisimosti Mongolii* ("recognition of Mongolia's independence"), not reflecting the expression "full power."[95]

After receiving the five demands from Mongolian government, the Soviet Russian People's Commissar for Foreign Affairs, G. V. Chicherin, also explained the meaning of "Chinese sovereignty" to Meiren Davaa. Chicherin stated:

91 Lkhamsüren, *Mongolyn gadaad orchin töriin tusgaar togtnol*, pp. 42–43; Aoki, *Mongoru kingendaishi kenkyū: 1921–1924*, pp. 172–173.

92 Lkhamsüren, *Mongolyn gadaad orchin töriin tusgaar togtnol*, p. 43; Bor, *Mongolyn tusgaar togtnolyn gerel süüder*, p. 18; Aoki, *Mongoru kingendaishi kenkyū: 1921–1924*, p. 173.

93 Aoki, *Mongoru kingendaishi kenkyū: 1921–1924*, p. 176. However, further documentary survey is needed to reveal whether the Russians explained to the Mongols that "Chinese sovereignty" was a "Chinese suzerainty." At the 3rd Congress of the Mongolian People's Party on 12 August 1924, for instance, the report of the Foreign Ministry stated that "Mongolia would never again accept Chinese limited-governing power (*khemjeetei ezerkhekh erkh*)," suggesting that Mongolian side may have understood "Chinese sovereignty" as a "suzerainty." See *Mongol ardyn namyn guravdugaar ikh khural: 1924 ony naim–yösdügeer sar, delgerengüi temdeglel* [The Third Great Khural of the Mongolian People's Party: August–September 1924, Detailed Minutes] (Ulaanbaatar: Ulsyn Khevleliin Khereg Erkhlekh Khoroo, 1966), p. 82.

94 These five demands were later introduced at the 3rd Congress of the Mongolian People's Party on 12 August 1924. See Lkhamsüren, *Mongolyn gadaad orchin töriin tusgaar togtnol*, pp. 44–45; Bor, *Mongolyn tusgaar togtnolyn gerel süüder*, p. 19; Aoki, *Mongoru kingendaishi kenkyū: 1921–1924*, p. 174; *Mongol ardyn namyn guravdugaar ikh khural*, p. 82.

95 S. G. Luzianin, *Rossiia–Mongoliia–Kitai v pervoi polovine XX veka: Politicheskie vzaimootnosheniia v 1911–1946 gg*, 2nd ed. (Moscow: OGNI, 2003), p. 139.

> Bulgaria, even when it was under Turkey sovereignty (Mo. *suverenitet*), still possessed the great power to establish relations with foreign states. And nowadays although Tibet had not separated from Chinese sovereignty (*suverenitet*), it is still able to establish relations with foreign state without being ruled by China. Mongolia, therefore, could similarly recognize nominal Chinese sovereignty (*suverenitet*) while stabilize your own situation as in the cases of Tibet and Bulgaria.[96]

Here, the term "sovereignty" was rendered in Mongolian using the Russian loanword *suverenitet*. This is significant, as it appears to be the earliest Mongolian document currently available to me in which "sovereignty" was explicitly referenced. It also indicates that the term "full power," which until this point conveyed the idea of independence, was not equivalent to "sovereignty"; otherwise, Davaa would have translated *suverenitet* as *bürin erke* ("full power").

However, the notion of "full power" appears to have begun to expand beyond the meaning of "independence" when it was written into Mongolia's first constitution of 1924. Accelerated by the establishment of the 1924 Sino–Soviet Agreement, Mongolia decided in June 1924 to transition to a People's Republic.[97] Through the first State Great Khural (Congress) in November 1924, the constitution, which was drafted by the Russian jurist P. V. Vsesviatskii and translated into Mongolian by Rinchino, was promulgated on 26 November.[98] Significantly, Chapter 1, Article 1 of the Constitution proclaimed Mongolia to be a "People's Republic with full power" (*bügüde nayiramduqu bürin erke-tei arad ulus*). In the corresponding Russian version, however, this phrase was rendered as *nezavisimaya Narodnaya Respublika* ("independent People's Republic").[99] Similarly, in the explanatory note attached to Article 14 of the same chapter, the Mongolian text states that the state would fight back against those who encroach upon its state's "full power." In the corresponding Russian version, this was translated as fight back against the encroachments on the state's "independence."[100] If the Mongols merely intended to express the meaning of

96 See Mongolian document quoted in Lkhamsüren, *Mongolyn gadaad orchin töriin tusgaar togtnol*, pp. 44–45; Bor, *Mongolyn tusgaar togtnolyn gerel süüder*, p. 20; Aoki, *Mongoru kingendaishi kenkyū: 1921–1924*, pp. 175–176. Aoki Masahiro also quoted a document in which Dukhovskii explained to Davaa that Chinese sovereignty (Jp. *shuken*) was merely nominal. However, I have not accessed to the original Mongolian expression. See, Aoki, *Mongoru kingendaishi kenkyū: 1921–1924*, p. 175.

97 Aoki, *Mongoru kingendaishi kenkyū: 1921–1924*, pp. 300–303.

98 Sablin et al., "Khural Democracy," p. 32.

99 *The Constitutions of Mongolia 1924·1940·1960·1992*, p. 27; M. A. Vaksberg, *Konstitutsiya revolyutsionnoy Mongolii* (Irkutsk: 1-ya Gostipo-litografiya, 1925), p. 41.

100 *The Constitutions of Mongolia 1924·1940·1960·1992*, p. 35; Vaksberg, *Konstitutsiya revolyutsionnoy Mongolii*, p. 44.

"independence," they already had an established term (the *tusgaar togtnol*).[101] Why, then, was the expression "full power" employed?

A speech by Mongolian Prime Minister Tserendorj at the Second State Great Khural on the 6 November of the next year indicates that by 1924–1925 the term "full power" may have begun to acquire a meaning closer to "sovereignty." In his speech, Tserendorj referred to Yuan Shikai's attempt to restore the monarchy in December 1915 as follows:

> "Yuan Shikai had held the supreme power (*degedü erke*) of the state, then suppressed the rights of the people and attempted to make himself a full-powered emperor (*büren erketü qaγan*)."[102]

As discussed in the previous section, since the late 1910s *degedü erke* ("supreme power") appears to denote the highest authority within a state, so it is understandable that Tserendorj described Yuan as holding the state's supreme power. However, the expression "full-powered emperor" cannot simply mean an "independent emperor." It is therefore reasonable to assume that "fully-powered" (*büren erketü*) here conveys the meaning of "sovereign" (Ru. *suverennyi*). Furthermore, although the State Great Khural should properly be described as holding the *degedü erke*, Tserendorj at times stated that the State Great Khural possessed the "full power."[103] This strongly suggests that the term "full power" had begun to acquire a meaning closer to "authority" or "sovereign power" rather than merely "independence."

Finally, it is possible to identify when the term *bürin erke* became established as denoting "sovereignty." In the first modern Russo–Mongolian terminology dictionary, published in 1928 in Verkhneudinsk (modern Ulan-Ude) and republished

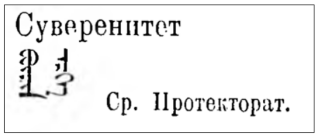
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Figure. 1

101 The Mongolian minutes recording the discussions on the draft of the constitution on 25–26 November 1924 do not provide explanation of the term "full power." See, J. Amarsanaa and O. Batsaikhan, eds., *Mongol ulsyn ündsen khuuli: Barimt bichig* [The Constitutions of Mongolia: Documents] (Ulaanbaatar: Shinjlekh Ukhaany Akademi, 2004), pp. 51–60.

102 S. Tuyaa, D. Tüvshinzayaa, S. Chuluun and M. Erdenebat, eds., *Ulsyn khoyordugaar ikh khural, ulysn neg, khoyor, guravdugaar baga khural* [The Second State Great Khural and the First, Second, and Third State Little Khurals] (Ulaanbaatar: Bembi San, 2009), p. 345.

103 I found the following sentences: "The reason of the development of this country's … is because the khural has been invested with full power." (*Tus ulus-un* […] *uruγsi debsiǰü bükü inü tus qural qariyatu ulus-un bürin erke-yi edlegülün čidaγsan*.); "Although this country [China] has a State Great Khural, it does not possess the full power of the state." (*Enekü ulus-tur ulus-un yeke qural bui kemebečü terekü qural-dur tus ulus-un bürin erke-i bariγulqu ügei*.); "No other countries, except the Soviet Union […] and our Mongolia, have such a khural which possess full power." (*J̌̈öblel-ün ǰasaγtu qolbuγatu ulus ba* […] *man-u mongγul qoyar ulus-ača öger-e ulus-ud-tur ene metü bürin erke-i edlegsen qural-tai γaǰar öger-e ügei*.). See, *Ulsyn khoyordugaar ikh khural, ulysn neg, khoyor, guravdugaar baga khural*, p. 345.

in 1930, *bürin erke* is listed as the equivalent of *suverenitet* ("sovereignty", see Figure 1).[104] This suggests that by the late 1920s the term "full power" had already become established as Mongolian rendering of "sovereignty." I argue that this dictionary is a reliable source. It contains 1806 modern terms from various fields and carefully distinguishes forty-two terms used in Buryatia (marked with Cyrillic *b*) and in Mongolia (marked with *m*). For *syuzerenitet* ("suzerainty"), the dictionary gives *degedü eǰen-ü erke* (literally "supreme emperor/ suzerain/ lord's power") marked with *b*, and *kemǰiyetei-ber eǰerkekü erke* ("limited-governing power") marked with *m* (see Figure 2). The latter corresponds to the (Outer) Mongolian rendering of "suzerainty" in 1910s.[105] For *suverenitet* ("sovereignty"), however, it provides *bürin erke* without being marked with *b* or *m*, indicating that both Mongolia and Buryatia were using the same term for "sovereignty."

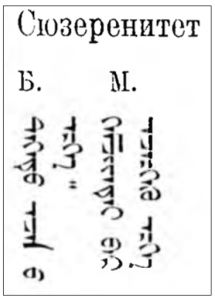
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Figure. 2

Conclusion

From the 1911 declaration of independence to the promulgation of the first constitution in 1924, the transition of the key Mongolian terms through which the Mongols asserted their independent status can be summarized as a shift from *ulus törü* to *öber-iyen eǰerkekü* ("self-governing"), and finally to the modern Mongolian terminology of "sovereignty," *bürin erke* ("full power"). This development demonstrates that the modern Mongolian concept of sovereignty emerged from the need to protect and assert Mongolia's independent status.

The evolution of such terms reflects not only a conscious transformation of Mongolian conceptions of statehood—from an indigenous framework to modernity—but also the significant role played by Buryat-Mongol intellectuals that promoted this transformation. At the same time, it reveals Mongolia's own response to the international geopolitical situation shaped by its two powerful neighbors as it sought to retain its independence.

The 1911 Mongolian declaration of independence was conceptualized by Mongols through an indigenous framework, that is, breaking away not only from the Qing *ulus* (state) but also from the Manchu Qing *törü* (legitimate rule), and thereby reconstituting a Mongolian *ulus* and establishing a Mongolian törü. This conceptualization was reflected in the appearance of the expression *ulus törü* in early 1910s, which continued to be used to refer to an "independent Mongolian state" until the early 1920s.

104 G. R. Rinchine, ed., *Orus ba mongγul kelen-ü nere tomiyan-u toli bičig* (*Russko–Mongol'skii terminologicheskii slowar'*), 2nd ed. (Verkhneudinok: Burgosizdat, 1930), p. 163.

105 *Orus ba mongγul kelen-ü nere tomiyan-u toli bičig*, p. 165.

The Mongols were not relying solely on the indigenous concept of *ulus törü*, but also sought to acquire knowledge from international law that could strengthen their statehood. Traceable to the concept of "sovereign state" in *Elements of International Law*, the notion of a "self-governing state" (*öber-iyen/ öbertegen eǰerkekü ulus*) from *Tümen ulus-un yerüde-yin čaγaǰa* contributed to the development of Mongolian understandings of modern statehood. Notably, the Buryat–Mongol intellectual Tsyben Zhamtsarano, who devoted his energy to introducing modern political concepts, played a significant role in reinforcing the interpretation of "self-governing" as conveying the meaning of "independence" through his writings. Importantly, he also attempted to introduce the concept of "sovereignty" through the term *degedü erke* ("supreme power"), emphasizing its exclusive authority over state territory and its importance for the state's external independence.

The Mongolian conceptualization of sovereignty began to take clearer shape during the 1914–1915 Kyakhta tripartite conference. During the conference, the Mongols came to understand that being an autonomy under Chinese suzerainty would mean being a "small state possessing half power." This realization led the Mongols to understand that a truly independent state must possess a *bürin erke* ("full power").

This understanding appears to have been shared by Buryat-Mongol intellectuals including Rinchino, who promoted the use of *bürin erke* as an established term strongly implying independence. Following the 1921 Mongolian Revolution, *bürin erke* became an established term used to assert Mongolia's independent status, particularly in response to the Russo–Chinese negotiations. Importantly, the 1924 constitution proclaimed Mongolia to be a "People's Republic Possessing Full Power." Further analysis of this "full power" and its usage from 1924 onward is needed in order to deepen our understanding of the development of the Mongolian concept of sovereignty.