

Will Uzbekistan benefit from ratification of the Aarhus Convention?



Bash Wind Power Project in Uzbekistan (photo: CEE Bankwatch Network).

In 2025, Uzbekistan finally acceded to the Aarhus Convention,¹ becoming the last Central Asian state to ratify the treaty. As part of the accession process, the Uzbek government has revised its law on environmental expertise, environmental impact assessment and strategic environmental assessment, introducing new provisions that reflect the Convention's requirements. The amended law was signed by President Shavkat Mirziyoyev on 24 February and came into effect on 25 August, six months after its adoption.²

Ratification of the Convention has the potential to strengthen environmental governance and support more sustainable and effective responses to the country's environmental challenges. But to fully realise these benefits, the Uzbek government will need to remove existing barriers by enforcing transparency

¹ United Nations Economic Commission for Europe, [Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters](#), United Nations, 25 June 1998.

² Lex.uz, [Law of the Republic of Uzbekistan on Environmental Expertise, Environmental Impact Assessment, and Strategic Environmental Assessment](#), Lex.uz, 24 February 2025.

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mechanisms, adopting good practices in implementing national environmental legislation, and empowering civil society to operate in a wider and freer civic space.

Bumpy ride for development

Boasting the largest population in Central Asia, Uzbekistan is also home to abundant natural resources and rich biodiversity. The country's development commitments – spanning economic transformation, human capital development, social well-being, and the green economy – have led to a number of positive changes in recent years, including the abolition of forced labour, which prompted a global boycott of the Uzbek cotton industry for over a decade, until 2022.³ Uzbekistan is currently reporting rapid growth in its key agricultural sector⁴ and has expressed strong commitments to green energy programmes, including a target of achieving 54 per cent renewable electricity by 2030.⁵ This new appetite for reforms has helped create a more favourable climate for foreign investment.

In fact, major international financial institutions investing in development projects in Uzbekistan have sought to apply higher environmental standards guided by the principles of the Aarhus Convention. When multilateral development banks – such as the European Bank for Reconstruction and Development (EBRD), the European Investment Bank (EIB), the World Bank, and the Asian Development Bank (ADB) – finance development projects, particularly those categorised as high risk, they are required to ensure information disclosure, public engagement, accountability, and access to grievance and redress mechanisms.

However, despite the steady flow of foreign investment,⁶ environmental harms in Uzbekistan continue to be documented and the implementation of transparency and participation standards remains low, even in projects supported by international financial institutions. Bankwatch has reported incidents of environmental pollution linked to agricultural development projects, including the use of harmful pesticides, contamination of water streams, and damage to local farmers' beehives and mulberry trees.⁷

Monitoring of development projects by civil society shows that exploitative labour practices are still occurring.⁸ Bankwatch and the Uzbek Forum for Human Rights have repeatedly reported on cases of human rights violations, including forced evictions, land grabs, and unfair labour conditions.⁹ Retaliation

³ Cotton Campaign, [Cotton Campaign - Government of Uzbekistan Joint Statement on Ending the Call for a Global Boycott of Uzbek Cotton](#), Cotton Campaign, 10 March 2022.

⁴ President of the Republic of Uzbekistan, [Measures to Increase Productivity and Interest in Agriculture Identified](#), President of the Republic of Uzbekistan, 12 February 2024.

⁵ Eurasianet, [Uzbekistan: Going green in a big way](#), Eurasianet, 29 January 2025.

⁶ Durbek Akhmedov, [Opinion: Over the Past Eight Years, New Uzbekistan Has Absorbed Over \\$113 Billion in Foreign Investments](#), *The Times of Central Asia*, 15 August 2025.

⁷ CEE Bankwatch Network, [Pulling the 'cotton' over Uzbek eyes at latest EBRD investment](#), CEE Bankwatch Network, 26 January 2021.

⁸ Lynn Schweisfurth, [International Organizations Cannot Help You. Do Not Speak to Them](#), *Uzbek Forum for Human Rights*, 2 April 2024.

⁹ CEE Bankwatch Network, [Indorama Agro: Uzbekistan's infamous cotton producer](#), CEE Bankwatch Network, accessed 17 October 2025.

against citizens who speak out also persists, and independent rights observers have been threatened with criminal charges for monitoring development projects.¹⁰ With extremely limited space for independent media coverage,¹¹ popular Uzbek bloggers who raise concerns or criticise socio-economic issues face systematic repression, including reprisals and prosecution.¹² Such practices are clearly incompatible with the principles of the newly ratified Convention and undermine the country's prospects for sustainable development. If Uzbekistan is to honour its stated commitments, further reforms are undoubtedly required.

Legal frameworks playing catch up

While monitoring the first renewable energy projects in Uzbekistan, Bankwatch had already raised concerns about the rapid development of wind and solar plants without the necessary regulatory or strategic frameworks in place to safeguard against social and environmental risks.¹³ Due to insufficient information disclosure and a lack of detailed risk and impact assessments, these projects failed to address risks linked to adverse impacts on local biodiversity and site selection, including obstacles to establishing national protection areas. Community needs have also been overlooked, as the energy produced by these new plants is typically fed into the national grid instead of supplying nearby settlements, with the projects offering limited local employment opportunities.

Recent research on the impact of the Aarhus Convention on environmental governance in Uzbekistan highlights major shortcomings, particularly in relation to transparency, public involvement and access to justice.¹⁴ Despite limited progress, however, some recent advances have been made. In August 2025, the new environmental expertise, environmental impact assessment and strategic environmental assessment law entered into force.¹⁵ Additionally, in a joint effort, the EBRD, the ADB, the International Financial Corporation, the Asian Infrastructure Investment Bank, and the Uzbek government have started partnering on a strategic environmental and social assessment of the development of Uzbekistan's renewable sector.

Although Bankwatch has been able to take part in the consultation process for this assessment, facilitating the involvement of international partners and several local experts, public participation and transparency at the national level remain limited. Additionally, the traditional sensitivity surrounding environmental data in Uzbekistan means there is a scarcity of independent environmental non-governmental organisations

¹⁰ Coalition for Human Rights in Development, International Accountability Project, Early Warning System, [Financing Repression](#), *Coalition for Human Rights in Development*, December 2024.

¹¹ Reporters Without Borders, [Uzbekistan](#), *Reporters Without Borders*, accessed 27 October 2025.

¹² Sher Khashimov, Asiya Kerimova, [Bloggers in the Crosshairs: The Complex Reality of Media Freedom in Uzbekistan](#), *The Diplomat*, 4 July 2024.

¹³ CEE Bankwatch Network, [A false start for wind energy in Uzbekistan?](#), *CEE Bankwatch Network*, 1 December 2022.

¹⁴ Bobir Turdiev, [The Aarhus Convention: A framework for transforming environmental governance in Uzbekistan](#), *Review of European, Comparative & International Environmental Law*, 34(2), 7 June 2025.

¹⁵ Lex.uz, [Law of the Republic of Uzbekistan on Environmental Expertise, Environmental Impact Assessment, and Strategic Environmental Assessment](#), *Lex.uz*, 24 February 2025.

capable of providing effective oversight, including ensuring meaningful public participation in decision-making processes.¹⁶

Public participation in need of real voices

Ratification of the Aarhus convention has raised hopes that Uzbekistan will enact effective democratic reforms that ensure greater transparency and accountability in environmental governance. Yet if standards are to be upheld, the country must rethink its approach to one of the Convention's key principles: public participation.

Civil society – the driving force behind public participation under the Convention – remains weak and heavily restricted in Uzbekistan. Despite official statistics indicating a relatively high number of registered civil society organisations in the country, many of these groups are in fact government-organised non-governmental organisations.¹⁷ At the same time, it remains extremely difficult for independent civil society organisations to register or maintain operations, with some groups having to submit multiple reapplications after repeated refusals, waiting years to be registered.¹⁸

The very few independent non-governmental organisations and unregistered civic initiatives that currently monitor environmental issues are burdened with endless red tape, limited funding opportunities, and continuous pressure. Without strong independent grassroots organisations – those that have free access to information, the necessary skills, and safe and fair conditions to provide meaningful oversight on environmental matters – ratification of the Convention may become a mere formality rather than a robust accountability tool.

Accession to the Aarhus Convention represents a major milestone for Uzbekistan. The country's commitments to accelerating development and responding to global climate challenges require improvements to its legal framework and accountability mechanisms. Successful implementation of the Convention will depend on genuine government will to advance reforms, strengthen legislation, and develop and maintain a system for ensuring barrier-free access to information.

What remains an even greater priority is opening up the country's heavily restricted civic space to facilitate a safe and enabling environment for human rights defenders and inclusive public participation. Uzbekistan must support and empower its citizens by providing capacity-building opportunities, access to knowledge, and incentives to stay informed, speak out, express their opinions, and participate in environmental decision-making.

¹⁶ Bobir Turdiev, [The Aarhus Convention: A framework for transforming environmental governance in Uzbekistan](#), *Review of European, Comparative & International Environmental Law*, 34(2), 7 June 2025.

¹⁷ Catherine Putz, [Uzbekistan Needs NGOs, But the Barriers Remain High](#), *The Diplomat*, 20 April 2021.

¹⁸ Uzbek Forum for Human Rights, [Obstacles to Registration of Human Rights NGO Akbaskur in Karakalpakstan](#), *Uzbek Forum for Human Rights*, 14 July 2025.