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Civil Society and Stakeholder Engagement in Uzbekistan: Restrictions on Freedoms of Expression and Association

Meaningful public participation and independent monitoring and reporting require an enabling environment for civil society. During the ADB's Annual Meeting in Samarkand in May this year, the Uzbek security services attempted to [prevent the attendance](#) of Uzbek Forum, whose director had been invited to speak on a [panel on retaliations](#) and their impact on public participation.

Despite a liberalization of online media in the early days of the Mirziyoyev presidency, the expectations held at the outset of the administration have not been met. The state continues to routinely deny state registration to independent grassroots civic groups and has established systematic control over existing NGOs, requiring them to submit regular activity reports and detailed information about work-related travel, and denying them access to foreign funding. This poses serious challenges for development finance institutions (DFIs) to conduct meaningful stakeholder engagement and ensure human rights due diligence and compliance with environmental and social safeguards.

Non-Governmental Organizations (NGOs)

[NGO registration](#) in Uzbekistan is an overly bureaucratic and time-consuming process and registration of self-organized activist groups, especially independent human rights groups, is practically impossible. In many cases, rights defenders have had their [applications rejected](#) time and again on trivial grounds such as spelling mistakes. While the government claims to have thousands of NGOs, the vast majority are governmental NGOs, (GONGOs), including political parties, trade unions and mahallas (community councils) that are established, funded and overseen by government bodies. The few well-established NGOs that exist are involved in humanitarian or non-controversial sectors that pose no perceived threat or criticism of the government and are often tasked with carrying out state policies. The only two independent human rights organizations that have been registered in the entire history of Uzbekistan are restricted in their activities due to barriers to receiving foreign funding and [reprisals](#) against their members.

NGOs must be registered by the state and operating without registration may result in administrative penalties. The activities of state-registered NGOs are regulated by the Ministry of Justice of Uzbekistan through government decrees and internal documents issued by the Ministry of Justice.

The Ministry of Justice places several restrictions on the activities of NGOs:

- Prior notification of events, including meetings and online discussions, at least ten days in advance (20 if there are foreign participants).
- NGOs are required to use an online system to submit reports, notify authorities about events, and provide information on international travel and other activities. Limitations on the system

does not allow for submitted information to be edited to accommodate any changes to planned activities and can result in penalties, such as fines.

- NGOs must obtain approval before receiving funding from foreign sources and report such transactions to the relevant authorities, undermining NGO work on sensitive issues such as corruption.
- NGOs must notify the Ministry of Justice about international travel related to their activities and ensure accreditation of foreign staff.
- NGO logos and symbols must be formally registered with the Ministry of Justice.
- The interpretation and application of rules governing NGOs are vague, exposing NGOs to inadvertent violations and subsequent penalties.

Trade Unions

There are no known independent trade unions in Uzbekistan. The Federation of Trade Unions of Uzbekistan (FTUU) is a government-aligned body and the only trade union confederation in Uzbekistan. FTUU leadership is not selected by workers but by government and business representatives who traditionally occupy the chairmanship.

There was only one known [democratically elected trade union](#) in Uzbekistan, founded by workers at Indorama Agro, a cotton producing company financed by EBRD, IFC and ADB. After fighting to win employment contracts for workers, the company, with the assistance of local officials, changed their contracts to “service providers”, automatically gutting the union of most of its membership. A [report](#) published in November 2025 by the ILO’s Committee of Experts on Freedom of Association explicitly requested the Uzbek government to ensure that “trade union rights can be exercised in normal conditions with respect to basic human rights and in a climate free of violence, pressure, fear and threats of any kind.”

Monitors documenting rights violations related to DFI projects, including [Indorama Agro](#), have been subjected to retaliations by government officials, obstruction of monitoring, surveillance and threats of criminal charges. Workers who shared information with monitors were summoned to the police station and local government administrations where they were questioned about their conversations and repeatedly warned against “speaking to international organizations”. In August 2023, six Indorama workers, including two trade union activists, were prevented from leaving the country to attend a labor rights workshop.

International standards, including those under the International Covenant on Civil and Political Rights, emphasize that restrictions on freedom of association must be necessary, proportionate, and clearly defined. Requirements that are overly detailed, rigid, or difficult to implement in practice may have the unintended effect of limiting the development of an active and independent civil society.

Freedom of Expression

Restrictions on freedom of expression and the media [limit critical reporting](#) on development projects in the public arena. In recent years, Uzbekistan has witnessed an [alarming escalation](#) in attacks against journalists, activists and bloggers who are intimidated, harassed and detained for carrying out their legitimate work. The Uzbek authorities continue to imprison people for non-violent offences such as “insulting the president online” (Article 158, part 3) and the police and security services actively use

administrative and criminal charges such as “defamation” and “insult” against internet users for critical comments made online.

More recently, government-aligned actors have [coordinated a campaign](#) targeting rights activists by exploiting weak safeguarding of the social media platforms Meta and YouTube. Multiple, simultaneous complaints citing fake copyright violations have resulted in the suspension and even deletion of over two dozen social media accounts since the beginning of 2026, effectively silencing independent voices.

Mahallas

Mahallas in Uzbekistan are presented as “organs of citizens’ self-governance,” responsible for addressing local issues, distributing social assistance, supporting family matters, and contributing to crime prevention. The government often presents the mahalla as a legitimate alternative to independent civil society for public participation in development projects.

However, in recent years the mahalla has become increasingly integrated into the state structure, including through the establishment of a dedicated ministry overseeing mahalla affairs. In practice, mahalla leaders function as the lowest tier of the state administration. Nonetheless, each of the thousands of mahallas throughout the country is registered as a separate NGO.

Due to their proximity to citizens and access to personal information, mahallas enable a form of everyday, community-level surveillance. While mahallas retain elements of traditional mutual support, in practice they also serve as an instrument of social control within Uzbekistan’s governance system.

Recommendations to EBRD:

- Remind the Uzbek government of its international commitments to freedoms of association and expression and convey that they are essential for stakeholder engagement and to ensure due diligence and compliance.
- Desist from over-reliance on information from clients, government and quasi-governmental bodies such as mahallas and GONGOs to inform project risk and ensure effective monitoring and compliance with safeguards by proactively engaging with independent civil society actors and monitors.
- Publicly reiterate EBRD’s zero-tolerance policy on retaliations and convey to the Uzbek government and clients that patterns of credible allegations of retaliations will result in penalties such as the suspension of loan disbursements.
- Ensure an impartial project-level grievance mechanism that is resourced to respond to allegations of rights violations and retaliations and implement a swift process to identify, mitigate and prevent retaliations against civil society actors, bloggers, journalists and monitors, as well as stakeholders.
- Support outreach and capacity-building measures to ensure that civil society is fully informed of project impacts and EBRD’s social and environmental obligations and provide assistance to those who come under pressure from the authorities when they raise concerns.