

UZBEK FORUM FOR HUMAN RIGHTS AND TASHKENT-SNOS
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Uzbek Forum for Human Rights and Tashkent - SNOS submit this report to assist the UN Human Rights Council in its Universal Periodic Review (UPR) of the policies and practices of the Government of Uzbekistan. This report documents the Uzbek government's policies and practices relating to land use, property rights and tenancy rights. These policies violate the government's obligations under the International Covenant on Civil and Political Rights (ICCPR), the International Covenant on Economic, Social and Cultural Rights (CESCR) and the Universal Declaration of Human Rights (UDHR).

Uzbek Forum for Human Rights is a Berlin-based NGO dedicated to defending human rights and strengthening civil society in Uzbekistan.¹ Uzbek Forum for Human Rights has particular expertise in rights violations in the agriculture and cotton sectors.

The activist group Tashkent - SNOS² was established in 2017 to inform residents on issues related to forced evictions, the implementation of provisions of the Constitution and other Uzbek laws, and to provide mutual assistance in defending their rights. The Tashkent - SNOS group has 28,000 subscribers and is run by Ms. Farida Sharifullina, a civil society activist. It also maintains a website at www.housing-uz.info.

Terms and abbreviations:

- CC: Civil Code of Uzbekistan
- CoAP: Code of Administrative Procedure
- DCM: Decree of the Cabinet of Ministers
- LC: Land Code of Uzbekistan
- LRU: Law of the Republic of Uzbekistan
- MoJ: Ministry of Justice
- UC: Urban Code of Uzbekistan
- STC: State Tax Committee

¹ <https://www.uzbekforum.org/>

² <https://www.facebook.com/groups/328799110874813>

Forced Evictions and Illegal Demolitions

The reporting period from 2017 to 2022 was marked by unprecedented irregularities in land allocation and seizure. The years 2017-2019 were particularly difficult. At that time, city, and district hokims allocated large tracts of land in neighborhoods where people already resided in their legally registered privately owned homes.

Guarantees in the matter of demolitions and evictions are regulated by the legislation of the Republic of Uzbekistan on the protection of private property and on the seizure of property for public needs. The inviolability of the home is guaranteed by Article 27 of the Constitution.³ The Housing Code of the Republic of Uzbekistan states⁴: “Dwelling houses, apartments that are in private ownership cannot be withdrawn, the owner cannot be deprived of the right of ownership to a residential building, apartment, except in cases established by law. Compulsory withdrawal of a dwelling is allowed only on the basis of a court decision in the cases and in the manner prescribed by law.

In addition, item 53 of the Constitution of the Republic of Uzbekistan in accordance with Article 17 of the Universal Declaration of Human Rights⁵ guarantees the protection of all forms of property by the state. “Private property is inviolable and protected by the state. The owner can be deprived of it only in cases and in the manner prescribed by law” (Article 53 of the Constitution of the Republic of Uzbekistan⁶). Thus, a person may be deprived of housing in his property only in exceptional, specific cases established by law by a court decision⁷. Although numerous laws exist which should in theory protect the rights of citizens affected by illegal evictions and demolitions, they are contradictory and in practice ignored by the authorities and not implemented by the courts.

The allocation of land monitored by civil activists in 2017-2022 is contrary to the National Report of Uzbekistan submitted in accordance with paragraph 5 of the annex to the Human Rights Council resolution 16/21* Uzbekistan”⁸, and in particular in relation to the following points:

B41. The right to development

§35: Uzbekistan successfully fulfilled its commitments in respect of the millennium development goals.

Water and land resource management has been improved.

1. Citizens' main grievances are that hokims' decisions to allocate land to private companies result in the seizure and demolition of dwellings and are per se illegal.⁹

Not a single decision allocating land to property development firms was approved by a resolution of the Council of the Municipal Deputies. This is despite the fact that it was required by Article 10 of the Law of the Republic of Uzbekistan (LRU) "On local state power": "The hokim of the region, district, and city have the right to grant possession, use and lease of land to enterprises, institutions, organizations, dekhkan (smallholder) farms, and citizens, to terminate the rights of possession and use of land by these subjects and to withdraw land with the subsequent approval of the decisions made by the relevant Council of People's Deputies.”¹⁰ The approval of the Municipal Councils is still

³ <https://lex.uz/docs/35869>

⁴ <https://lex.uz/docs/106134>

⁵ Article 17 of the Universal Declaration of Human Rights:

1. Every person has the right to own property both individually and jointly with others.
2. No one shall be arbitrarily deprived of his property.

⁶ <https://lex.uz/docs/35869>

⁷ <https://lex.uz/docs/35869>

⁸ A/HRC/WG.6/30/UZB/1: [1802892 \(un.org\)](https://www.un.org/ru/1802892)

⁹ <https://housing-uz.info/ru/1113/>

¹⁰ https://lex.uz/acts/112168?ONDATE=18.09.1993_00#120953

required, but under a new law.¹¹ On October 1, 2022, the Law of the Republic of Uzbekistan No. 781, "On procedures for the withdrawal of land plots for public needs with compensation" dated June 29, 2022 (hereinafter the Law of the Republic of Uzbekistan No. 781/2022), came into force. This was followed by another law, No. ZRU-782, "On the introduction of amendments and additions to certain legislative acts in connection with the improvement of procedures for the withdrawal of land plots for public needs with compensation", dated June 29, 2022. In June of the same year, another law, "About entering changes and additions in some legislative acts in connection with improvement systems that ensure equality and transparency in land relationships, reliable protection of rights on the land and transformation into market assets" dated June 6, 2022 (No. ZRU-775) was also adopted.

2. Decisions of hokims to demolish homes were made without prior informed consultations with residents or their consent. At the time most of the decisions were issued, the Decree of Cabinet Ministers (DCM) No. 54 of February 25, 2013 "On Measures to Fundamentally Simplify the System of Land Allocation for Urban Planning and Other Non-Agricultural Uses, as well as Issuing Permits for Construction of Facilities" was in effect. §12 of Annex No. 1 to this Decree reads¹²: "In cases where an application is received from legal entities and individuals for the provision of land plots occupied by buildings and structures, the rights to which are registered for other individuals and legal entities in an order established by law, the applicant is sent a notice to negotiate with the properties' owners in order to make an offer to independently purchase the property from the owners or provide other options to choose free land plots". In other words, when a private firm applies for a plot where people live in their private houses, the hokimiyat and other bodies involved on the land allocation must refuse this request.

Furthermore, according to Article 37 (2) of the Land Code, "Companies interested in the acquisition of land plots for construction must, prior to design, agree in advance with the land users, as well as with the hokim on the location of the facility, the approximate size of the plot and the conditions of its allocation, taking into account the integrated development of the area".¹³

Article 6 of the Urban Code obliges the hokimiyats to provide conditions for the participation of citizens and public associations in discussions and decision-making on urban planning. The Urban Code protects the rights of citizens to a favorable urban environment and to openness and transparency of urban planning activities. According to Article 10 of the Urban Code (UC), „Citizens... have the right to reliable, complete and timely information on the state of the living environment, its proposed changes, master plans of settlements, construction and reconstruction of housing and civil engineering facilities, improvement of territories, carrying out of engineering and transport communications and other information on town planning activities". However, such information is never provided to citizens.

3. Legislation describes only the seizure of land plots and the demolition of residential and non-residential structures for state and public needs. They are described in the Decree of the Cabinet of Ministers No. 97 of May 29, 2006, which was in force during the reporting period ¹⁴, and was subsequently migrated to the DCM 911 of November 16, 2019 ¹⁵ and to the new law LRU-781 of

¹¹ <https://lex.uz/uz/docs/6087438>

¹² <https://lex.uz/docs/2138919>

¹³ [30.04.1998. Земельный кодекс Республики Узбекистан \(lex.uz\)](#)

¹⁴ [97-сон 29.05.2006. Об утверждении положения о порядке возмещения убытков гражданам и юридическим лицам в связи с изъятием земельных участков для государственных и общественных нужд \(lex.uz\)](#)

¹⁵ [911-сон 16.11.2019. Жисмоний ва юридик шахсларнинг мулк ҳуқуқлари кафолатларини таъминлаш ҳамда ер участкаларини олиб қўйиш ва компенсация бериш тартибини такомиллаштиришга доир қўшимча чора-тадбирлар тўғрисида \(lex.uz\)](#)

June 29, 2022, "On procedures for taking land plots for public needs with compensation".¹⁶ The list defining public needs is clearly set out:

- Provision of land for the needs of defense and state security;
- Fulfilment of obligations arising from international treaties;
- Discovery and development of mineral deposits;
- Construction of roads, railways, airports, airfields, etc.;
- Implementation of master plans of settlements in terms of construction of facilities financed from the State Budget of the Republic of Uzbekistan.

However, during the reporting period, vast tracts of land in densely populated areas of cities were allocated to private firms for commercial interests, including the construction of multi-storey apartment blocks, shopping centers, and hotels. No studies have been carried out on the needs of the inhabitants and the city's social and engineering infrastructure. The general plans of the cities, particularly Tashkent, have not yet been adopted. In other words, construction is carried out in a chaotic manner. The construction of large housing blocks does not provide for the construction of public schools, kindergartens, or hospitals.

D51. Administration of justice and fair trials

4. Residents of the areas subject to demolition in accordance with decisions of hokims have filed claims to the administrative courts for the annulment of the decisions, pointing out clear violations of the law. However, judges do not consider the merits of these applications and refuse to satisfy citizens' claims for one reason: the expiry of the time limit for filing an application under Article 186 of the Code of Administrative Procedure (CoAP)¹⁷ which states: "Unless this Code or other laws establish other time limits, an application (complaint) against a decision, action (inaction) of an administrative body, a citizens' self-government body or their officials, may be lodged in court within three months of the date on which the person concerned became aware of the violation of his/her rights, freedoms and lawful interests."

However, according to Article 149 of the Civil Code of Uzbekistan (CC), "The general limitation period is three years."¹⁸

A42 and A47. Public institutions and good governance

§17 proclaims the principle according to which the people are not at the service of State bodies but that State bodies are at the service of the people.¹⁹

5. The very process of decision-making by hokims, whereby private firms receive enormous tracts of land (from one to ten hectares) in central Tashkent and other cities, is completely non-transparent. Such decisions are not registered in the legal database of the Ministry of Justice and are not published on the websites of hokimiyats, therefore completely lack transparency and accountable tracking mechanisms.

Hokims' decisions on land allocation do not include details of buildings that are to be demolished and consist only of minimal information such as approximate land location and size. The developers and cadaster services identify buildings and flats to be demolished, as well as families that are to lose their housing, only AFTER the decisions are made. Any kind of information, including justification of decisions are absent, effectively obstructing access to information. No demolition statistics exist at the state level and no state institutions are held responsible for publishing

¹⁶ [ЗРУ-781-сон 29.06.2022. О процедурах изъятия земельных участков для общественных нужд с компенсацией \(lex.uz\)](#)

¹⁷ [25.01.2018. Кодекс Республики Узбекистан об административном судопроизводстве \(lex.uz\)](#)

¹⁸ <https://lex.uz/docs/111181>

¹⁹ A/HRC/WG.6/30/UZB/1: [1802892 \(un.org\)](#)

demolition data, an infringement on the right to information. Unfair demolitions only become publicly known after victims pro-actively advocate for the right to adequate housing by raising awareness of their cases, publishing information online, and enlisting the support of journalists.

6. An examination of the registration records of the companies in whose favor land allocation decisions are issued by hokims shows that the vast majority of these firms were established only several months before the decisions were issued, and in some cases even after the decision was issued.²⁰

The vast majority of these firms are registered as small and medium-sized businesses with small share capital and a small number of staff (one to 12 people).²¹ The business activities of these firms can be anything including hairdressing and the sale of office supplies, but not civil engineering.²² Civil engineering companies are not required by law to be licensed and any firm with no qualifications in construction can engage in it.²³

7. As a result, there is a lack of control over these construction projects. For example, Davron Adilov, the First Deputy Minister of Construction, Housing and Communal Services of Uzbekistan, stated that it is his responsibility to establish control and standards, and that the owner of the project (literally "that rich man" in Uzbek) was ultimately responsible for the construction of the building. Adilov said he could not guarantee the quality of work carried out by the millions of people involved in the construction sector.²⁴ The statement was made in light of the recent earthquakes that hit several regions in Turkey and Syria.

E1. Economic, social and cultural rights — General measures of implementation

E 31. Right to work

8. Since civil engineering in Uzbekistan is not considered a sector for which a license is required, anyone with connections in the country's top or lower levels of government can open a construction firm, easily obtain a plot of land, easily evict residents from their homes and begin construction without qualified personnel, no safety training, and no supervision at all. According to a Presidential Decree of October 30, 2020 "On organizational measures to reduce the shadow economy and improve the efficiency of the tax authorities", construction companies are allowed to hire workers without a contract and pay wages in cash.²⁵ Construction companies must submit a monthly register of any workers who are hired without a contract to the tax authorities, indicating the amounts paid to them. However, according to the Uzbek State Tax Committee (STC), in 2019-2022, about 10,000 companies in the industry out of 20,303 (i.e., 50% of all construction companies) have only one employee. According to the STC, this is an indicator that many construction companies are hiding the real number of employees.²⁶
9. Lack of construction control and occupational safety leads to accidents and deaths of workers. Between 2017 and 2020, 119 workers died at construction sites in Uzbekistan. "A total of 302 construction accidents occurred, resulting in 119 deaths and 117 serious injuries. Often these workers or their families do not receive compensation unless the company has taken out insurance," said Nozima Sulaimonova, a state labor inspector at the Ministry of Employment and

²⁰ <https://housing-uz.info/ru/843/>

²¹ <https://housing-uz.info/ru/1113/>

²² <https://housing-uz.info/ru/926/>

²³ [ПФ-6044 25.08.2020 Лицензиялаш ва рухсат бериш тартиб-таомилларини тубдан такомиллаштириш чора-тадбирлари тўғрисида \(lex.uz\)](#)

²⁴ [«За это отвечает застройщик», — о сейсмоустойчивости домов в Узбекистане - Новости Узбекистана \(upl.uz\)](#)

²⁵ [Об организационных мерах по сокращению теневой экономики и повышению эффективности деятельности налоговых органов \(uza.uz\)](#)

²⁶ <https://www.spot.uz/ru/2022/06/27/construction-taxation/>

Labor Relations.²⁷ For example, in December 2019, the Yunusabad metro line collapsed, killing six people who were crushed by iron and concrete structures in the tunnel. A year later, the Tashkent Prosecutor's Office named for the first time four low-level engineers responsible for the accident. A criminal case against them was dropped. The Tashkent Prosecutor's Office concluded that their actions related to violations of health and safety rules for construction work resulting in death, "fell into the category of not posing a major public danger".²⁸

In the sectors related to the production of building materials, and sometimes in construction itself, the use of prison labor is widespread which in itself is not prohibited by law. However, the rules of work safety must be respected for prisoners too. Human rights activists have reported that, for example, prisoners in the Kyzyl-Tepa prison colony 64/4 in Navoi Oblast were employed unloading hot bricks from kilns and were not provided with protective clothing. Their standard gloves and rubber-soled shoes quickly became unusable as they were burned, exposing the prisoners to injury.²⁹

B71. Human rights and the environment, § 37.

10. Non-stop construction heavily supported by the state is a gross violation of the Uzbek people's right to a healthy environment (Article 11 of CESC).³⁰ The Urban Code of Uzbekistan protects the rights of citizens to a favorable urban environment and to openness and transparency of urban planning activities.³¹ Tashkent has recently been listed among the countries with the most polluted air in the world. Citizens and the media consistently report that numerous construction projects, tree felling, drainage of water reservoirs and lack of watering of streets, have contributed to increased dust levels in Tashkent.³² Authorities regularly give assurances that the air quality in the city is satisfactory. Aziz Kalimbetov, head of the department of the Ministry of Natural Resources, even said that the high level of dust in the air is due to Uzbekistan's natural features, such as its dry climate and sandy clay soil.³³
11. Infill development: municipalities and developers find spacious yards between apartment buildings and attempt to squeeze in multi-story buildings. This is a way of maximizing return on investment as all infrastructure already exists and there is no need to resettle residents. However, the residents living at close quarters to these developments are adversely affected as the construction work as well as the finished building violates their right to adequate housing, which includes the right to a healthy ecological environment. In addition, infill developments violate the relevant provisions of current Uzbek legislation.^{34 35}
12. One of the reasons for the energy crisis in the winter of 2022-2023 is considered by experts to be the construction boom in the absence of city master plans with assessments of additional demands on energy systems. The huge number of new residential buildings creates additional demands at different stages of development. Firstly, extra electricity and gas is needed for the production of building materials, then even more energy is required for heating, off-grid water heating, and

²⁷ <https://www.gazeta.uz/uz/2020/02/13/death-work/?fbclid=IwAR1xcX0JZyae9L40MSvCksIlusumhF3ioI5qNC0sBSdZdXB8YX2t-0iPYu0>

²⁸ [Чем завершилось расследование ЧП на строительстве Юнусабадской линии метро – Новости Узбекистана – Газета.uz \(gazeta.uz\)](#)

²⁹ [Заключенные в Навойской области Узбекистана объявили голодовку из-за пыток \(fergana.agency\)](#)

³⁰ <https://www.ohchr.org/sites/default/files/cescr.pdf>

³¹ [22.02.2021. Градостроительный кодекс Республики Узбекистан \(lex.uz\)](#)

³² [Видео: Что ташкентцы думают о пыли в городе? – Новости Узбекистана – Газета.uz \(gazeta.uz\)](#)

³³ [В Минприроды заявили, что загрязнённый воздух в Ташкенте не оказывает вредного влияния на здоровье людей - Новости Узбекистана \(upl.uz\)](#)

³⁴ <https://housing-uz.info/ru/449/>

³⁵ <https://housing-uz.info/ru/594/>

lighting.³⁶

The government reacted to growing public anger and the press service of the Presidential Administration issued the following statement:

"The head of state criticized the fact that the demand on the existing infrastructure was not accurately calculated when construction permits were issued, and work on the organization of green spaces was not carried out in tandem with construction. Therefore, it was stressed that a moratorium on new construction would be declared before the approval of the city's master plan."

^{37 38}

However, this declaration has not been supported by any document, allowing judges to continue to deny citizens their demands to stop construction projects and overturn demolition decisions.

It is not President Mirziyoyev's first statement in relation to the construction sector. On September 9, 2021, during his election campaign, the President announced plans to reduce construction work in Tashkent: "Enough already. If we continue, the sewage system will not hold up, and people will not hold up, and there will be no green spaces - everything will turn into concrete."³⁹

In August 2021, the President said, "Due to the negligence or self-interest of some leaders, there is no open space in residential areas where people can walk, exercise and relax in the fresh air with their children."⁴⁰

13. Over a period of seven months in 2020-2021, the construction company Taco Sales Ltd. dug a huge pit for the construction of a 24-storey residential complex in the center of the Uzbek capital and discovered an entire underground river. The developer pumped out the groundwater and poured it into a ditch running along the street. No environmental impact assessment was carried out on the soil and plants, on the amount of water that was lost and the impact on the city's water supply, despite residents' appeals to the neighborhood council (mahalla). This is despite the fact that Uzbekistan is located in an arid zone and suffers from chronic shortages of fresh water.⁴¹

Illegal land confiscations

14. All agricultural land in Uzbekistan remains in state ownership and farmers generally lease their land for a period of up to 49 years. The legislation provides for three forms of agriculture land use: (1) a farm; (2) a dekhkan (small size farm); and (3) a cooperative farm. In recent years a fourth form, "agricultural clusters", vertically integrated private enterprises, has been widely used, although there is no definition of clusters as a form of land use in Uzbek legislation. Farmers' rights are extremely poorly protected and land leases can be terminated through coercive and corrupt practices by local officials (hokims).

On January 9, 2019, the government of Uzbekistan adopted a resolution "On Additional Measures to Optimize the Land of Farms and Other Agricultural Enterprises, and the Efficient Use of Agricultural Land".⁴² The objective was to "optimize farms and dekhkans" and transfer land to more "successful" farmers. In practice, the "optimization" has turned into a mass illegal seizure of farmers' land in violation

³⁶ <https://hook.report/2022/12/energokrizis/>

³⁷ https://t.me/Press_Secretary_Uz/2915

³⁸ <https://www.gazeta.uz/ru/2023/02/08/construction/>

³⁹ <https://www.gazeta.uz/ru/2021/09/10/new-tashkent/>

⁴⁰ <https://www.gazeta.uz/ru/2021/08/17/construction/>

⁴¹ <https://fergana.agency/articles/121706/>

⁴² <https://lex.uz/docs/4149388>

of their existing long-term land lease agreements.⁴³ In many cases, land transfers have been carried out by local officials on behalf of cotton clusters to ensure that the terminations were ‘voluntary’ and would incur no compensation for loss of land, assets, or income.

According to article 24 of the Land Code of Uzbekistan⁴⁴ the land plots given to farms under a long-term lease should be used strictly for their stated purpose, the land cannot be privatized, and it is not an object of purchase, sale, pledge, donation, or exchange. The lease agreement for a land plot may be changed or terminated by agreement of the parties, and if the parties fail to agree, only by a court decision.

Over the past three years, Uzbek Forum has observed cases of hundreds of farmers who have been forced to give up their land under different pretexts. Officials confiscate land for 1) failure to meet quotas for cotton production; 2) by applying pressure on farmers through intimidation to force them into signing a “voluntary” land lease termination (in some cases through use of physical violence); and 3) by transferring the land to “cotton clusters” (or private textile enterprises) by decisions of the Cabinet of Ministers.

1) Failure to meet quotas for cotton production

Although the Uzbek authorities have repeatedly promised to abolish state orders for cotton and wheat, in practice farmers are required to meet the quota for cotton production, which is set by the local authorities who strictly control the implementation of the quota and the contractual obligations of farmers to clusters.

According to Article 36 of the Land Code of the Republic of Uzbekistan,⁴⁵ the right to lease agricultural land may be terminated in the case of inappropriate use of the land, evidenced by a level of productivity below the normative within three years (according to the cadastral valuation). Failure to meet cotton quotas is often used as a method of creating grounds to terminate land leases.

Many cases are known of local officials forcing farmers to write an advance open-dated voluntary termination of their land lease, in case of failure to meet cotton quotas or plant produce as directed by the state. A farmer from Buvayda district told Uzbek Forum in November 2022 that he was forced to write such a statement in 2019, as a condition of receiving the land.

There are numerous cases where farmers who have not met their quotas for cotton in one year have been pressured to “voluntarily” apply for termination of their land leases. In October 2022 in Uchkuprik district of Ferghana region, several dozen farmers who had fallen behind in fulfilling their quotas were summoned to the hokimiyat and pressured into writing applications to return their land to the district reserve. The hokimiyat was forced to return the land to the farmers after the case was publicized in the media and intervention by the Ministry of Justice which pointed to a number of procedural irregularities in the application of the notary's rejection of the land.⁴⁶

2) Forced “voluntary” land lease terminations

The most common method of illegally seizing land from farms is a forced written statement taken from the farmer under pressure or by deception.

On January 18, 2019, the hokim of the Pop district of Namangan region, Azamjon Sultanov, under the pretext of holding a meeting, gathered some 450 district farmers in the hall of the district’s culture

⁴³ <https://www.uzbekforum.org/land-grabs-the-new-red-flag-for-uzbek-cotton-sector/>

⁴⁴ <https://lex.uz/docs/149947>

⁴⁵ <https://lex.uz/docs/149947>

⁴⁶ <https://kun.uz/news/2022/10/16/ariza-yozasan-bolmasa-mol-mulkingni-musodara-qilamiz-uchkoprik-fermerlari-otgan-asrning-30-yillarga-tushib-qoldi>

center, where farmers were told to write and sign statements confirming their voluntary surrender of their land to the state. Farmers who did not come to the meeting were brought in late at night by police officers. One farmer, a woman, was pulled from her bed at midnight and brought to the meeting under police escort. The farmers were locked in a cold room from 6 p.m. and not allowed to leave until they signed their statements to voluntarily give up their land.⁴⁷

Uzbek Forum interviewed dozens of farmers from Pop district who were forced to sign applications to “voluntary” terminate the land leases contract that night. One farmer told Uzbek Forum that most of them initially refused to sign these statements and protested against the procedure. This was followed by formal requests from the hokim, which then became threats.

3) Transfer of land to cotton clusters

In 2018, a government decree ordered the transfer of 50,000 hectares of land in Kashkadarya and Syrdarya regions to Indorama Agro, part of the Indorama Group, where 2,897 farms operated.⁴⁸ Of these, 1,068 farms are now under the control of Indorama Agro LLC, acquired via ‘voluntary’ land lease terminations. The transfer of land to Indorama Agro took place between 2018 and 2019 on the condition that farmers would be offered employment with the company. However, these commitments have not been upheld. Since 2019, Indorama has made hundreds of workers redundant, including 1,200 irrigators and 392 brigade leaders, as part of a restructuring process.⁴⁹ Moreover, no compensation has been paid for the termination of land lease agreements to those farmers who refused to be employed by the company.

There are dozens of examples of coercive and illegal practices relating to the transfer of land to the state reserve for the benefit of cotton clusters taking place throughout the country. In the absence of independent associations that represent farmers’ interests, farmers are left destitute with little or no redress.

Recommendations:

- Initiate investigations into the issuance of decisions that violate existing legislation and which citizens believe are driven by corruption.
- Remove discrepancies from the statute of limitations in the legislation. Massive public outcry against such decisions by hokims and citizens’ dissatisfaction with court decisions is resulting in a significant loss of trust in state and the judiciary.
- Ensure comprehensive registration of construction workers and strict compliance with labor laws and occupational health and safety.
- Establish an independent commission to investigate claims of illegal land confiscations and provide remedy for farmers whose land leases were illegally terminated.
- Ensure that the Land Code of Uzbekistan is evenly and transparently implemented.
- Conduct investigations into allegations of corruption related to illegal land confiscations and ensure swift compensation and remediation for victims.

⁴⁷ <https://www.uzbekforum.org/illegal-land-confiscations-in-uzbekistan-farmers-in-namangan-fight-for-their-rights-and-livelihoods/>

⁴⁸ <https://lex.uz/ru/docs/3860099>

⁴⁹ <https://www.uzbekforum.org/will-uzbekistans-first-democratically-elected-trade-union-survive/>