



Public report

**IMPACT OF THE LAW ON
NON-COMMERCIAL
ORGANIZATIONS ON CIVIL
SOCIETY IN KYRGYZSTAN**

1 September 2024 to 31 August 2025



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I. Executive Summary

1. This report aims to provide an evidence-based understanding of the impact on civil society of the enactment of the Law of the Kyrgyz Republic No. 72 of 2 April 2024, 'On Amendments to the Law of the Kyrgyz Republic "On Non-Commercial Organizations"' (hereinafter referred to as the 'Law on Foreign Representatives') and its effect on the Kyrgyz Republic meeting its targets under the Sustainable Development Goals (SDGs) and respecting the principle of "leave no one behind" (LNOB). The United Nations Secretary-General has emphasized the important role of civil society in "propelling sustainable development." In the Kyrgyz Republic, local CSOs have assisted the Government across a vast spectrum of development issues and have increased the state's capacity to identify who is most vulnerable and marginalized, which is key for successful LNOB implementation.
2. This report is based on monitoring conducted by OHCHR from September 2024 to August 2025, covering the seven regions of the country. Information was received from 115 civil society organizations (CSOs) that worked on a broad spectrum of issues, related to the rights of women, children, people with disability, youth, media, LGBTQ+, ethnic minorities, civil, political, social and economic rights.
3. The Law requires non-commercial organizations that receive funds from foreign sources and conduct "political activity" to register as a "foreign representative." Once registered, organizations must label all materials as foreign funded, undergo additional annual financial audits and other types of inspections, and report structural and personnel changes promptly. Non-compliance can lead to penalties, including suspension of activities and forced closure of the organization.
4. In 2023 and 2024, OHCHR raised concerns about the draft Law, in particular that it proposed to introduce vague definitions, burdensome reporting, discriminatory labelling and intrusion into the work of CSOs that undermine the rights to freedom of association, expression, non-discrimination and privacy, in violation of international human rights standards. While authorities have not taken a punitive approach to implementation and only five organizations have registered as foreign representatives, the very enactment of the Law and accompanying practices have created a serious chilling effect across the civil society sector, also effectively leading to undue interference and restrictions on the functioning of CSOs. Thirty-four per cent of CSOs contacted by OHCHR reported experiencing intensified surveillance and pressure from law enforcement authorities. In Talas and Batken regions, the figure was higher with 50 per cent of those interviewed affected. The Law's broad definition of "political activity" has led 77 per cent of CSOs to practice self-censorship. Among these, 69 per cent reduced public-facing activities and 85 per cent censored their public communication to avoid sensitive language or criticism. For human rights CSOs, the rate was higher, with 92 per cent self-censoring and 48 per cent changed their charters.
5. Across the Kyrgyz Republic, 37 per cent of organizations downsized or paused programmes, with higher rates in the regions, while 7 per cent self-liquidated. Forty-eight per cent of CSOs reported a reduction in cooperation with government authorities. Fifty-

two per cent of CSOs interviewed experienced negative public attitudes linked to stigmatizing public rhetoric against CSOs, with 39 per cent reporting social media attacks.

6. All election-related CSOs interviewed reported self-censoring while 71 per cent experienced social media attacks and at least four regional election organizations self-liquidated. With parliamentary elections scheduled for 2025 and presidential elections for 2027, the decrease of independent CSO election observation capacity raises serious concerns.
7. Eighty per cent of environmental CSOs also reported practicing self-censorship, 20 per cent stopped environmental advocacy, and 40 per cent downsized activities that could be considered sensitive or political. 50 per cent of disability-focused CSOs reported a reduction in government cooperation.
8. Forty-five per cent of women's CSOs scaled back or abandoned advocacy and political empowerment work. Out of 62 contacted women's organizations, four self-liquidated and at least 42 per cent downsized activities or shifted away from rights-based activities toward areas that are less likely to be considered political. All 10 CSOs interviewed that were previously working on women's political participation had ceased or drastically altered their programs. Given that women constitute 70 per cent of CSO leadership and 80 per cent of staff in some women's organizations, the Law has weakened one of the few professional spheres where women achieved significant employment and leadership opportunities.
9. Eighty-four per cent of youth CSOs practiced self-censorship, 47 per cent downsized activities and many reported law enforcement pressure and interference, leading to the cancellation of events. CSOs supporting the LGBTQ+ community have faced severe marginalization and harassment and ceased public activities entirely. One of the key LGBTQ+ CSOs in the Kyrgyz Republic has been forced to self-liquidate. CSOs serving sex workers, people living with HIV/AIDS and drug users have abandoned public advocacy and reported increased marginalization of these vulnerable groups.
10. Organizations that support progress on achieving the SDGs and LNOB were not excluded from the impact of the Law. Achieving the SDGs, including in relation to democratic processes, climate action and inclusive development requires strong civil society partnerships. The findings in this report indicate that the Law on Foreign Representatives together with other restrictive measures, have seriously weakened civic space in the Kyrgyz Republic, reducing compliance with the Kyrgyz Republic's human rights obligations – in particular the rights to freedom of expression and association - and risking progress towards attaining the SDGs and ensuring that no-one is left behind.
11. In light of these findings, the report makes a number of recommendations, including that the Government review the Law on Foreign Representatives and fully align it with the Kyrgyz Republic's international obligations; ensure CSOs are not required to register as foreign representatives for the legitimate exercise of freedom of expression and association; and promote balanced public messaging on CSOs' contributions to national development and the achievement of the SDGs.

II. Introduction

12. One year after the Law on Foreign Representatives has been operationally in force, this report aims to provide an evidence-based understanding of the impact it has had on civil society and the work that they do in supporting the Sustainable Development Goals (SDGs) and its principle of “leave no one behind” (LNOB). Under the Kyrgyz Republic-UN Sustainable Cooperation Framework 2023-2027,¹ the Regional Office for Central Asia (ROCA) of the Office of the UN High Commissioner for Human Rights (OHCHR) has analyzed legislation, policy and practices that impact civic space with the aim of providing support for the full implementation of relevant international human rights obligations and the achievement of the Sustainable Development Goals.
13. The Kyrgyz Republic has formally and repeatedly affirmed its commitment to implementing the UN 2030 Agenda for Sustainable Development.² To support these commitments, the government has formally acknowledged that the legal and regulatory environment is important for achieving the SDGs³ and has also embraced the LNOB framework.⁴ LNOB represents the UN Member States’ commitment, within the 2030 Sustainable Development Agenda, to eradicate poverty, end discrimination and prioritize the most marginalized populations. The Kyrgyz Republic has consistently cited LNOB as a “global commitment”⁵ in its Voluntary National Reviews⁶ and the National Development Strategy of the Kyrgyz Republic for 2018-2040.⁷
14. Civil society has been recognized as a key actor in achieving the SDGs. The UN Secretary-General has repeatedly emphasized the important role of civil society in “propelling sustainable development” and as “an essential bridge between people and their representatives.”⁸ In support of its successful candidacy for a third term on the UN Human Rights Council, the Kyrgyz Republic pledged to build capacity and work in partnership with CSOs in the development of national policy and other activities.⁹ Civil society is

¹ Priority Area 4 supports national efforts to promote “just, accountable, and inclusive institutions and a civil society that fosters peace, cohesion, and human rights for all”. The UNSDCF acknowledges that achieving development aspirations requires an enabling environment for a “vibrant civil society” to participate in public dialogue and decision-making. It also acknowledges that economic transformation cannot proceed without respect for human rights and the rule of law, and commits the UN Country Team to help the Government align with international human rights standards. United Nations in Kyrgyz Republic, *The Kyrgyz Republic: United Nations Sustainable Development Cooperation Framework 2023–2027* (June 2022), (Priority Area 4), Available from: <https://kyrgyzstan.un.org/en/260996-kyrgyz-republic-united-nations-sustainable-development-cooperation-framework-2023-2027>.

² Kyrgyz Republic's National Development Strategy 2018–2040 (March 2021) and National Development Program until 2026 commit to achieving the SDGs. The government's 2020 Voluntary National Review states that “more than 70 per cent of the relevant SDGs and targets have been incorporated” in national planning documents.

³ Ibid.

⁴ Available at: <https://sdgs.un.org/2030agenda>. See also: <https://unsdg.un.org/2030-agenda/universal-values/leave-no-one-behind>.

⁵ Key messages on Kyrgyz Republic VNR, available at:

https://sustainabledevelopment.un.org/content/documents/26169Main_Messages_Kyrgyz_Republic_EN.pdf

⁶ Kyrgyzstan's 2020 and 2025 VNR reports affirmed the country's commitment to LNOB and prioritizing vulnerable populations. Available at: <https://hlpf.un.org/countries/kyrgyz-republic>.

⁷ National Development Strategy of the Kyrgyz Republic, November 2018. See: <https://inff.org/resource/national-development-strategy-of-the-kyrgyz-republic>

⁸ UN Secretary-General Remarks to the United Nations Civil Society Conference in Support of the Summit of the Future | United Nations, 2024.

⁹ A/77/319.

particularly important in helping to ensure that those at risk of being left behind are represented in development processes. In the Kyrgyz Republic, local CSOs have assisted the Government across a vast spectrum of issues, including human rights, democratization, health, education and environmental protection. CSOs have increased the state's capacity to identify, monitor and analyze who is most vulnerable, discriminated against and marginalized, which is key for successful LNOB implementation. Beyond delivering services, civil society has played a crucial watchdog role — identifying problems, gathering evidence, developing and advocating solutions and engaging constructively with authorities to support them in fulfilling the Government's international commitments. The government itself has acknowledged “insufficient capacity” and “limited resources at the local level,”¹⁰ and in this context CSOs with donor support have represented a significant national asset, providing expertise, services and access to communities, in the spirit of the Goal 17 of the SDGs on partnerships.

15. The reliance on partnership extends to International Financial Institutions (IFIs), who provide significant development support.¹¹ In the case of the European Bank for Reconstruction and Development (EBRD), support is tied to best practices in human rights and accountability, where independent CSOs play a significant role.¹² Acknowledging the risks, the EBRD explicitly states in its Country Strategy for the Kyrgyz Republic 2024-2029 that the “government's efforts to tighten the regulatory environment for foreign-funded CSOs may hurt the Kyrgyz Republic's performance on voice and accountability”.¹³
16. While the Government itself has consistently presented its SDG implementation and monitoring process as collaborative, “multilateral and cross-sectoral” work, “based on partnership with all relevant stakeholders,” including CSOs,¹⁴ this report seeks to explore how the evolving environment for civil society has impacted its support for sustainable development in the country.

III. Methodology

17. This report is based on monitoring carried out from September 2024 to August 2025.
18. OHCHR Regional Office for Central Asia (ROCA) interviewed 82 civil society organizations (CSOs), represented by 104 interlocutors (78 women, 26 men), staff of organizations and individual experts in particular fields. Additionally, ROCA distributed a questionnaire to approximately 150-200 CSOs. A total of 60 CSOs responded. Of these,

¹⁰ VNR 2025. Available at : <https://kyrgyzstan.un.org/sites/default/files/2025-08/VNR%202025%20Kyrgyz%20Republic%20Report%20EN.pdf>.

¹¹ To date, the European Bank for Reconstruction and Development's (EBRD) cumulative investment in the Kyrgyz Republic stands at €1.072 bn. The Asian Development Bank has committed about \$2.9 bn.

¹² European Bank for Reconstruction and Development (EBRD), *The EBRD's Approach to Civil Society Engagement, 2024–29*. The document details the participation of CSOs in an Independent Project Accountability Mechanism. Available at: https://www.ebrd.com/content/dam/ebd_dxp/assets/pdfs/csc/ebdcs-engagement-with-civil-society/The-EBRDs-approach-to-civil-society-engagement-2024-29.pdf.

¹³ EBRD's Kyrgyz Republic Country Strategy 2024-29.

¹⁴ VNR 2025.

33 CSOs had not previously been interviewed by ROCA, bringing the total number of CSOs whose responses were analyzed to produce this report to 115.

19. These CSOs work on a broad spectrum of issues, related to the rights of women, children, people with disability, youth, media, LGBTQ+, ethnic minorities, civil, political, social and economic rights.
20. In addition, legislation, official documents, statements and other available information from government sources and non-governmental organizations (NGOs) were analyzed, alongside reports by state and independent media, international organizations, including UN reports and those submitted to UN Treaty Bodies and Special Procedures. ROCA also attended several consultations between government and civil society and observed trials, including those in which CSOs brought legal challenges to the Law.
21. In all interviews, ROCA was guided by the “do no harm” principle. The names and any identifying information of persons or CSOs interviewed are not included in the text of the report.

DISTRIBUTION OF CSO INTERVIEWS BY LOCATION



IV. The context of civic space in the Kyrgyz Republic

22. The adoption of the Law on Foreign Representatives in April 2024 was not an isolated event, but part of a broader effort to restrict the independent functioning of civil society, as highlighted by the UN High Commissioner for Human Rights during his country visit in March 2025.¹⁵ Particular concerns have been raised by UN human rights mechanisms regarding the introduction of legislation and other legal measures to restrict freedom of association, peaceful assembly, opinion and expression, as well as on criminal prosecutions and harassment against human rights defenders, journalists and others who criticized government policies.¹⁶ In 2022, the UN Human Rights Committee raised concern about reports of “undue government pressure on human rights defenders, lawyers, politicians, journalists and other individuals for expressing their opinion, in particular opinions that are critical of the Government’s initiatives, including the initiation of criminal proceedings against bloggers and journalists.”¹⁷
23. The Committee also raised concerns about “undue restrictions on the right of peaceful assembly... including reports of arrests, detention and sanctioning of activists for organizing and/or participating in peaceful assemblies.”¹⁸ It also expressed concern about the blanket ban imposed on peaceful assemblies in the centre of Bishkek.
24. In 2024, several UN Special Procedures raised concerns about searches of independent news outlets and arrests of associated staff and journalists. They also pointed out that the ruling to liquidate Kloop Media represented a serious blow to independent media in the Kyrgyz Republic and raised due process concerns.¹⁹ Criminal proceedings are ongoing at the time of writing against four technical staff related to Kloop Media under article 278 (3) of the Kyrgyz Criminal Code (calling for mass disorders).
25. Also in 2024, the UN Working Group on Arbitrary Detention (WGAD) determined that the detentions of nine journalists were arbitrary,²⁰ expressing concern over the use of article

¹⁵ “Kyrgyzstan: Türk says human rights are best guide where different interests must be balanced”, 20 March 2025, available at <https://www.ohchr.org/en/statements-and-speeches/2025/03/kyrgyzstan-turk-says-human-rights-are-best-guide-where-different>.

¹⁶ See, for example the UN Working Group on Discrimination against Women and Girls, at <https://www.ohchr.org/en/statements-and-speeches/2022/04/end-mission-statement-working-group-discrimination-against-women>. And UN Committee on the Eradication of Racial Discrimination in 2025, CERD/C/KGZ/CO/11-12, 9 May 2025.

¹⁷ UN Human Rights Committee, CCPR/C/KGZ/CO/3, 3 November 2022, para. 45.

¹⁸ UN Human Rights Committee, CCPR/C/KGZ/CO/3, 3 November 2022, para. 47. Similar concerns were raised by the UN Committee on the Eradication of Racial Discrimination in 2025, CERD/C/KGZ/CO/11-12, 9 May 2025, para. 19.

¹⁹ AL KGZ 1/2024, 15 March 2024, available at <https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gId=28872>. AL KGZ 5/2023, 27 October 2023, available at <https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gId=28575>. In 2022, Special Procedures also raised concerns about alleged criminalization of Mr. Bolot Temirov, the cancellation of his citizenship, and his deportation from the Kyrgyz Republic, following his journalistic reporting on allegations of corruption, see AL KGZ 3/2022, 19 December 2022, at <https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gId=27767>; and AL KGZ 1/2022, 19 July 2022, at <https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gId=27434>.

²⁰ UN Working Group on Arbitrary Detention, Opinion No. 57/2024 concerning Saparbek Akunbekov, Aike Beishekeeva, Azamat Ishebekov, Akylbek (“Akyl”) Orozbekov, Aktilek (“Maadanbek”) Kaparov, Tynystan Asypbekov, Saipidin Sultanaliyev, Maksat Tazhibek uulu and Zhoodarbek Buzumov (Kyrgyzstan), 3 March 2025, at <https://www.ohchr.org/sites/default/files/documents/issues/detention-wg/opinions/session101/a-hrc-wgad-57-2024-kyrgyzstan->

278 (3) of the Kyrgyz Criminal Code “to suppress their legitimate criticism of the Government, including on issues related to corruption.”²¹ In addition, the WGAD considered that the nine individuals’ right to the presumption of innocence was violated.²²

26. In 2024, several UN Special Procedures raised concern with the Government regarding the prosecutions and convictions under article 278(3) of the Criminal Code (calls for mass disorder) of activists for exercising their right to freedom of opinion and expression.²³
27. The findings below on the impact of the Law on Foreign Representatives therefore need to be seen within this larger context.²⁴

V. Background and overview of the Law on Foreign Representatives

28. In 2013, two members of Parliament introduced draft amendments to the 1999 Law ‘On Non-Commercial Organizations’ to require non-commercial organizations to register as foreign agents, if they received foreign funding and were carrying out “political activities”. In 2016, following public discussions and harsh criticism, the Parliament rejected the amendments.
29. In 2021, within the framework of constitutional reforms, the parliament adopted amendments that strengthened financial oversight of Non-Commercial Organizations, requiring them to upload annual financial reports detailing income and expenditures, including from foreign sources, as well as information on property acquired, property in use and property that has been disposed of, on the State Tax Service website annually by 1 April.²⁵ The UN Human Rights Committee subsequently expressed deep concern about these amendments as imposing unreasonable and burdensome reporting requirements on non-governmental organizations.²⁶

[aev.pdf](#). On these cases, see also the OHCHR statement “Concern over prison sentences for Kyrgyz journalists”, 10 October 2024, at <https://www.ohchr.org/en/statements-and-speeches/2024/10/concern-over-prison-sentences-kyrgyz-journalists>.

²¹ “The accusations against the individuals appear to be based on their critical opinions, shared through social media, which were deemed to “discredit” the Government. This response by the authorities effectively equates dissent and public criticism with incitement to violence, a stance that contradicts international human rights standards”, WGAD, Opinion No. 57/2024, para 104.

²² The WGAD stated that public statements by the authorities “suggested that the individuals were guilty of inciting mass riots, thereby undermining their right to a fair trial” and that the nine individuals were “shackled or kept in cages during trials or otherwise presented to the court in a manner indicating that they may be dangerous criminals”, *ibidem*, para 109 and 111.

²³ AL KGZ 2/2024, 30 July 2024, at <https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gId=29214>.

²⁴ It should be noted that the suspension of U.S. government funding in January 2025, occurred midway through the period of research for this report and created a significant additional stress on civil society. It forced numerous organizations to pause programmes, terminate staff and lose office space, weakening their institutional capacity and adding hardship to a sector already under pressure. While this financial crisis exacerbated the sector’s vulnerability, the chilling effects of the Law on Foreign Representatives are a distinct phenomenon. The patterns of surveillance, self-censorship, strategic withdrawal from advocacy, stigma and other impacts described below were already widespread and well-documented in the months preceding the funding cuts.

²⁵ Amendments to the Law of the Kyrgyz Republic ‘On Non-Commercial Organizations’, under which public associations, foundations, associations of legal entities, and institutions (with the exception of state and municipal institutions) operating with financial and material resources received on a gratuitous basis had to provide this additional financial information to the State Tax Service. The Cabinet of Ministers approved the new disclosure form and submission procedure on 22 March 2022.

²⁶ UN Human Rights Committee Concluding observations CCPR/C/KGZ/CO/3, 9 December 2022.

30. On 19 May 2023, 33 members of Parliament submitted amendments to the 1999 Law ‘On Non-Commercial Organizations’ and the Criminal Code that were substantively the same as the draft amendments submitted in 2013, except for the replacement of the term “foreign agent” with “foreign representative”.
31. UN human rights mechanisms, including the UN Committee on the Rights of the Child,²⁷ the UN Committee on Social, Economic and Cultural Rights,²⁸ as well as Special Procedures of the UN Human Rights Council²⁹ expressed their deep concerns over the restrictive draft Law. In addition, the UN Country Team³⁰ and OHCHR raised concerns regarding the Law and OHCHR called upon the Kyrgyz Parliament to reject it.³¹
32. The criminal provisions in the Law were removed in February 2024, prior to its adoption by the Parliament on 14 March 2024 and approval by the President of the Kyrgyz Republic on 2 April 2024.
33. The Law requires non-commercial organizations (NCOs) that receive funds from foreign sources and that conduct “political activity” to register as a “foreign representative.”³² Political activity, according to the law, excludes work in science, culture, art, healthcare, social support, disability support, protection of motherhood and childhood, healthy lifestyles, sports, protection of flora and fauna, and charity. The definition of “political activity” in the law is broad and vague, and could effectively include any actions aimed at influencing Government decisions, changing state policies, sharing opinions or shaping public opinion about Government decisions. As such, it is inconsistent with the principle of legality required for any legitimate restriction of freedom of association (Article 22, ICCPR).³³
34. Once registered, organizations must submit detailed organizational information, label all materials as foreign funded, undergo additional annual audits, and report structural and personnel changes promptly.³⁴ The Ministry of Justice (MoJ) has the power to request internal documents from NCOs registered as Foreign Representatives, obtain their financial information from state and financial institutions, attend organizational events, and conduct activity audits, including the use of funds and property.³⁵ Non-compliance can lead

²⁷Concluding observations CRC/C /KGZ/CO/5-6, 18 October 2023

²⁸Concluding observations E/C/12/KGZ/CO/4, 11 October 2024.

²⁹ The Special Rapporteur on the rights to freedom of peaceful assembly and of association; the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression and the Special Rapporteur on the situation of human rights defenders.

³⁰ The UN Resident Coordinator and OHCHR took part in more than 15 public discussions raising concerns about the draft Law, including the 17 October 2023 public Parliamentary Hearings that were organized by the Parliamentary Committee on the Constitutional Legislation, State Structure, Judicial and Legal Issues and Rules of Procedure of the Parliament

³¹ [Kyrgyzstan: Concerns over a proposed law on society organization | OHCHR](#)

³² Law of the Kyrgyz Republic “On Amendments to the Law of the Kyrgyz Republic ‘On Non-Commercial Organizations’”, No. 72, 2 April 2024, available at <https://cbd.minjust.gov.kg/4-5321/edition/6031/ru>.

³³ The Human Rights Committee clarified in the context of freedom of expression that “a law” must be formulated with sufficient precision to enable an individual to regulate his or her conduct accordingly... [and] may not confer unfettered discretion for the restriction ... on those charged with its execution.” General Comment 34, para. 25.

³⁴ [Ibid.](#)

³⁵ [Ibid.](#) para. 11, Article 17 (1).

to penalties, including suspension of activities for six months and potential forced closure of the organization.

35. On 27 August 2024, the Cabinet of Ministers issued Resolution No 518, which established the procedure for registration and significantly expanded oversight powers of state authorities, allowing additional inspections by tax authorities and other executive bodies, as well as giving the General Prosecutor's Office the right to determine whether an NCO is carrying out political activities and complying with their statutory objectives.³⁶ The Resolution came into force on 9 September 2024, setting 9 November 2024 as a deadline to submit applications for registration. As of September 2025, only five organizations had registered as Foreign Representatives in the MoJ Registry. All registered voluntarily and they include three environmental organizations and two business associations.³⁷

VI. Key finding on impact of the Law on civil society

36. Following the introduction of the Law on Foreign Representatives, although the authorities did not adopt a punitive approach to its implementation, its enactment and accompanying practices have had a significant impact on the daily functioning of CSOs. The majority of CSOs (76 per cent) reported a chilling effect on their activities. Not only does this raise concerns related to freedom of expression, but it also effectively amounts to an excessive interference in the ability of CSOs to undertake their functions, thereby also amounting to undue restriction on the right to freedom of association.

A. Increased surveillance

37. Since the adoption of the Law on Foreign Representatives in spring 2024, CSOs across the Kyrgyz Republic have reported intensification of surveillance and pressure by state authorities, particularly the State Committee for National Security (SCNS).
38. Overall, 34 per cent of CSOs³⁸ stated that they experienced increased surveillance and contact from law enforcement bodies.³⁹ Nearly 17 per cent experienced multiple forms of pressure simultaneously. Those interviewed described visits of SCNS officers to their organizations, unannounced attendance by plainclothes officers at their public events, visible notetaking of participants' names, requests for detailed information on activities and funding, and in some cases, summons for questioning at SCNS premises.⁴⁰ There were also reported incidents when local state officials who cooperated with CSOs were called in for questioning by the SCNS. In some instances, venue administrators, including schools and

³⁶ Para.37 of the Regulation on the Procedure for Maintaining the Register of Non-Profit Organizations Performing the Functions of Foreign Representatives and Conducting Audits of Their Activities.

³⁷ Registry in Ministry of Justice: <https://nko.minjust.gov.kg/ru>.

³⁸ The number includes both categories, directly interviewed CSOs and those who completed the online survey.

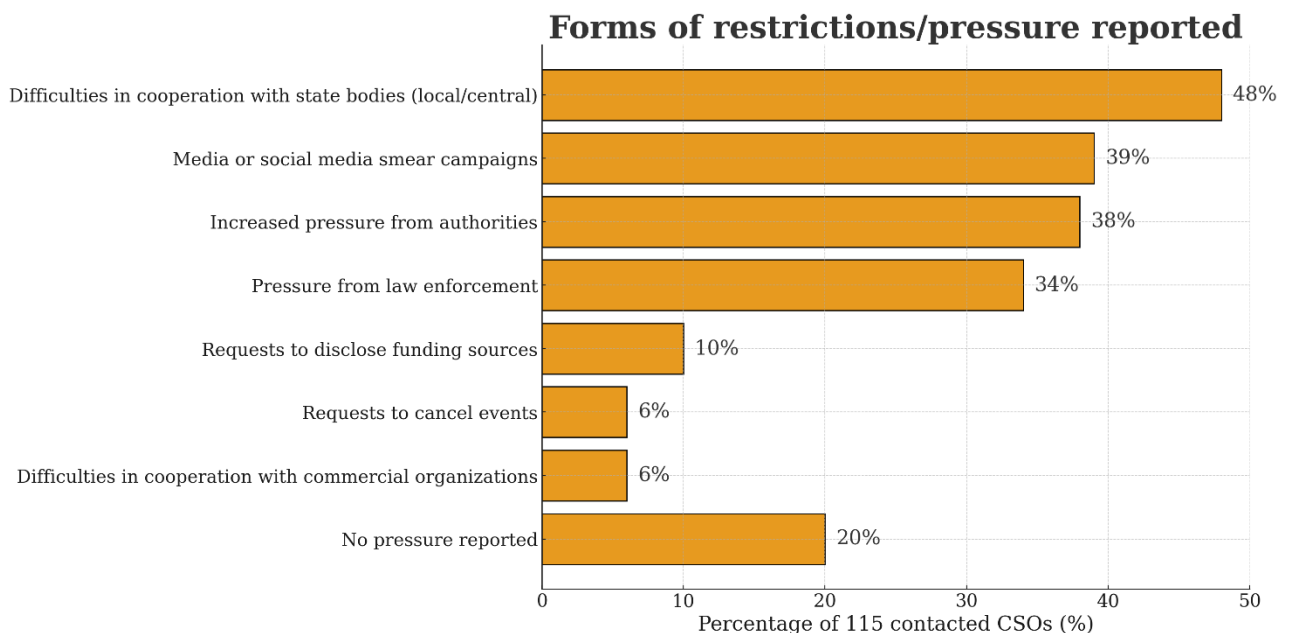
³⁹ Sixty-six per cent of CSOs either did not report pressure or did not provide clear data on this question, which may indicate either absence of pressure or reluctance to report it.

⁴⁰ Interviews 2024 CS 001, 016, 021, 027, 029.

universities, were warned by the SCNS not to allow their premises to be used for youth CSO events.⁴¹

39. In Talas and Batken, there was a higher level of surveillance, with over 50 per cent of interviewed CSOs reporting a high intensity and frequency of contact from the SCNS, including repeated in-person visits, repetitive rounds of identical questions about projects, partnerships, funding and the CSOs' views on the Law.⁴²

40. CSOs in Osh, Jalal-Abad, Naryn and Issyk-Kul also reported increased surveillance, pressure and visits by the SCNS.⁴³ Some interlocutors mentioned that SCNS officers, who used to monitor their activities politely, changed their approach and began to make threats and asked for personal details of attendees of events, especially if there was someone from the opposition or if 'political topics' were discussed.⁴⁴ CSOs whose activities involved advocacy, coordination, legal challenges to state actions, investigative journalism, political participation or the promotion of politically sensitive issues, such as gender equality, LGBTQ+, election monitoring and corruption reporting, were more likely to be contacted by the security services. Fifty-two per cent of CSOs interviewed working on human rights protection, independent journalism and election monitoring reported surveillance/pressure/contacts by SCNS. In contrast, only 21 per cent of CSOs primarily focused on direct social service provision, humanitarian aid or technical environmental work, while still overall impacted by the Law on Foreign Representatives, experienced direct security service intervention.



⁴¹ 2024 CS 013 .

⁴² 2025 CS 053; 2025 CS 043; 2025 CS 040.

⁴³ 2024 CS 027.

⁴⁴ 2025 CS 065.

B. CSO self-censorship and reduced advocacy

41. The risk of being required to register as a foreign representative, increased surveillance, detention of HRDs, journalists and activists and negative public rhetoric about CSOs, have led 77 per cent of CSOs across all regions of the country to self-censor.⁴⁵ Out of those, 69 per cent reduced public-facing activities (scaled down advocacy, media, and outreach) and 85 per cent censored communications (avoided sensitive language/criticism).⁴⁶
42. CSOs removed words like “advocacy,” “rights,” “gender equality,” and “civic engagement” from their charters and public materials, avoided publicity and criticism of government policies and shifted from public advocacy to low-visibility service delivery.
43. Ninety-two per cent of interviewed human rights CSOs reported practicing self-censorship, Social service-provision organizations that should be excluded from the requirement to register under the Law, also felt at risk if they engaged in advocacy to change laws, policies or practices that relate to their area of social service, as such work could be classified as “political activity” under the Law.⁴⁷ Even though their activities were in many cases supported by the Government, 70 per cent of service-provision CSOs interviewed decided to self-censor and move away from or scale down areas of work that could be defined as political.
44. The majority of active CSOs in Batken, Talas, Naryn and Issyk-Kul regions have primarily focused their work on social portfolios, such as youth education, peacebuilding, disability inclusion, GBV response and crisis support, women’s economic empowerment, health, education, and non-controversial environmental projects. These topics have generally not been considered sensitive and at times work in these areas has been supported by the Government. However, despite this, CSOs in these regions have also practiced self-censorship.⁴⁸

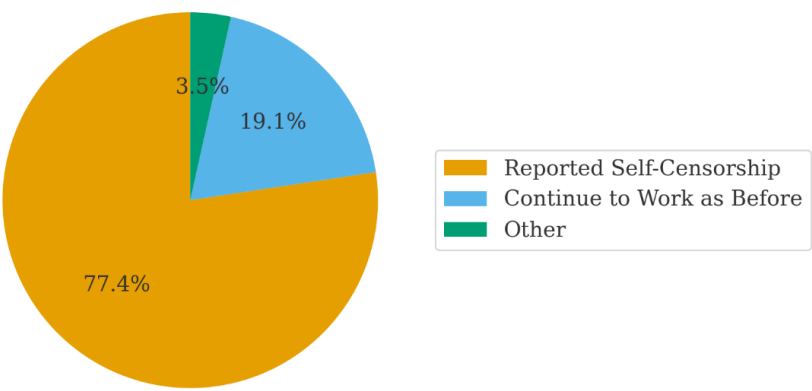
⁴⁵ This percentage is out of the 115 CSOs that were interviewed and surveyed.

⁴⁶ 2024 CS 002, 2024 CS 021, 2024 CS 029; 2024 CS 027; 2025 CS 079.

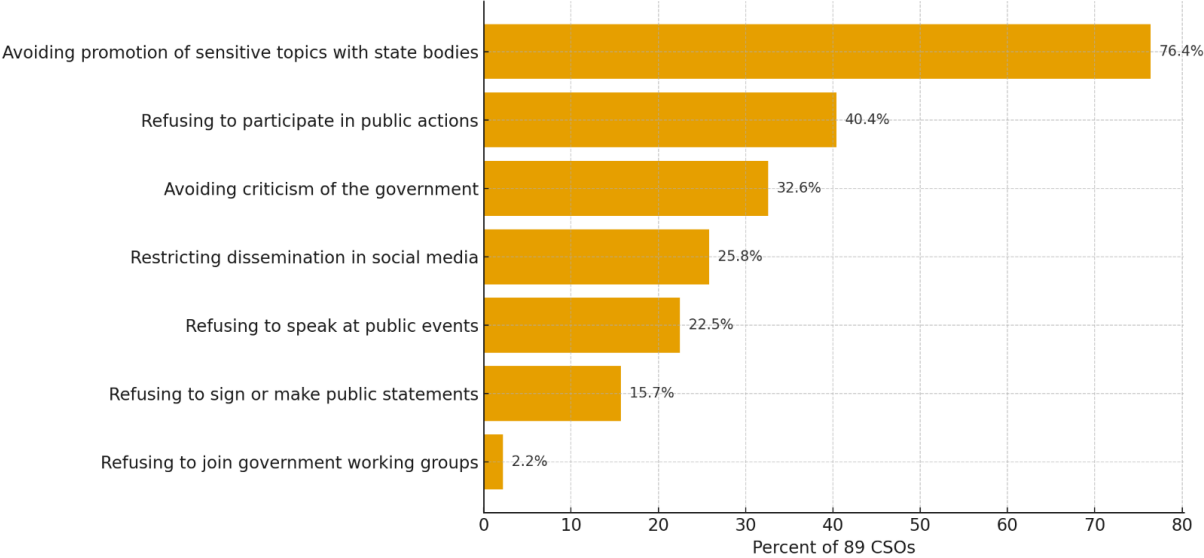
⁴⁷ 2024 CS 009, 2024 CS 015, 2024 CS 002.

⁴⁸ 2025 CS 054; 2025 CS 040; 2025 CS 042; 2025 CS 037; 2025 CS 038; 2025 CS 081 and others.

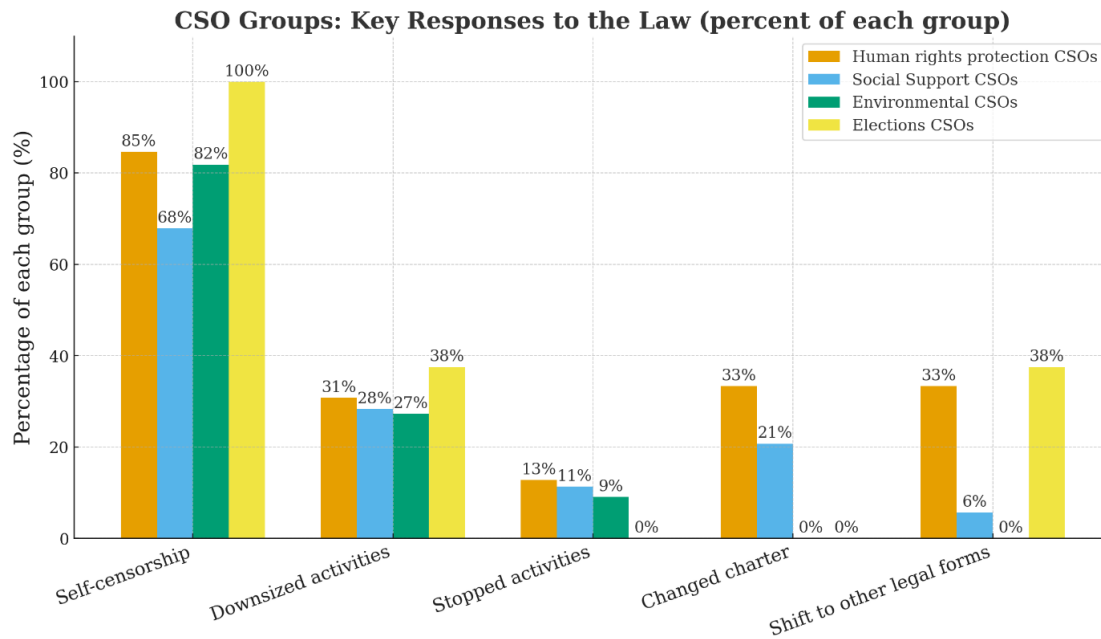
Self-Censorship among 115 CSOs (Percent)



Types of Self-Censorship among 89 CSOs that reported self-censorship



C. Decrease in activity of CSOs



45. The introduction of the Law on Foreign Representatives, combined with the pressures outlined in this report, has led to a serious reduction in CSO activity, particularly in the regions. Thirty-seven per cent of CSOs interviewed mentioned that they downsized or paused programmes, 19 per cent self-liquidated, restructured or changed their legal form. Thirty-six per cent of human rights CSOs interviewed reported consciously scaling back or pausing activities and 16 per cent self-liquidated.

46. The impact of the Law has been most severe in the Naryn, Batken and Talas regions where the majority of human rights and political advocacy organizations have ceased their work or liquidated entirely, leading to a sharp decline in active civil society. Prior to the adoption of the Law, CSOs reported that in Talas and Batken, each had between 12 to 16 active CSOs. By February 2025, the majority of organizations had become inactive, leaving only five or six actively functioning CSOs in each region⁴⁹ At least seven active CSOs in Naryn, with long histories of implementing donor-funded projects and serving local communities, decided to self-liquidate. OHCHR estimates that out of at least 15 active CSOs in Naryn region⁵⁰ prior to the introduction of the Law, only about five CSOs have remained active.⁵¹ CSOs in Osh and Issyk-Kul, while also under pressure, have shifted to less sensitive topics and have managed to maintain cautious cooperation with local authorities. In Issyk-Kul, reportedly, out of 18 previously active CSOs, four self-liquidated, several became inactive

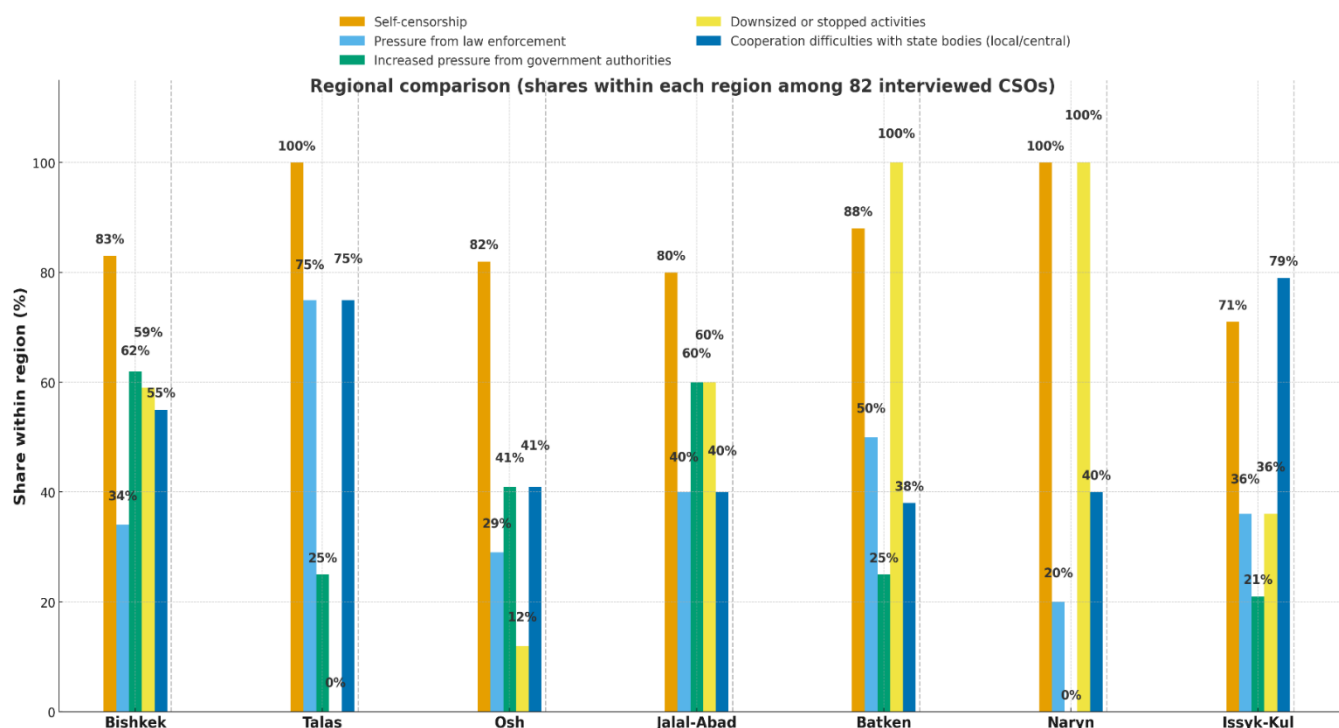
⁴⁹ 2025 CS 040; 2025 CS 053.

⁵⁰ Interview no. 2025 CS 065.

⁵¹ ROCA's estimates based on interviews.

due to a fear of the Law and/or the lack of funding, leaving around 10-12 actively functioning CSOs.

47. Even though CSO activities also decreased in Bishkek, a greater concentration of CSOs and legal expertise has enabled CSOs to pursue adaptive strategies.



D. Stigma and negative public perception

48. With the adoption of the Law on Foreign Representatives, the CSO community in the Kyrgyz Republic has faced increased stigmatization. Government-led information campaigns have portrayed CSOs as promoting foreign values that contradict Kyrgyz traditions, misusing grants and creating trouble, leading to growing public distrust.⁵² CSOs reported that these negative public perceptions have been harming their work, making it harder to connect with the communities they serve and gain their support.

49. These harmful narratives, together with the Law on Foreign Representatives, have stigmatized CSOs. Thirty-nine per cent of CSOs contacted indicated experiencing social media attacks and smear campaigns. CSOs in rural areas were particularly affected.⁵³ One women's rights CSO working with community women leaders in the southern rural areas of the Kyrgyz Republic stated that a foreign representative labelling would have an acutely

⁵² 2025 CS 043; 2025 CS 044; Government narratives have labeled NGOs as “anti-national,” “enemies of the state,” and “agents of foreign influence.” See: State news agency Kabar commentary, “For some NGOs, Western grants are more important than our values,” 19 November 2020.

⁵³ 2024 CS 022.

negative impact in rural communities.⁵⁴ The director of an organization that focuses on civic education and the rights and empowerment of women and youth, noticed that, with the adoption of the Law on Foreign Representatives, “people started calling us foreign agents”. The increased mistrust and fear made cooperation with local officials more difficult, as “some now think we collect information for foreign governments,” even though the organization was not registered as a Foreign Representative.⁵⁵

50. Of 82 organizations interviewed, 52 per cent reported facing or being afraid of widespread negative public attitudes, mistrust, or harmful labeling in their communities. One CSO representative said that despite working for the community, “we are treated like enemies.”⁵⁶ This negative image has had a strong demotivating effect with CSO staff feeling discouraged, isolated, undervalued and no longer welcome in public life. As a result, some CSOs have stopped working or closed entirely. CSOs also reported very few newcomers to the sector with young people being less and less interested in joining them. In many cases, these developments have risked leading to the disappearance of local civil society actors in smaller towns and rural areas, where no one remains to continue their work.⁵⁷

E. Civil society-government cooperation

51. CSOs observed a notable change in the government’s attitudes to civil society and international partnerships. Countrywide, relations with local authorities have chilled. 48 per cent of contacted CSOs across the country reported challenges in working with government bodies, including their explicit refusal to cooperate.
52. Even though the Law does not restrict cooperation with CSOs, apparently fearing repercussions from central government authorities and security services or influenced by negative public rhetoric about CSOs, local officials have largely reduced or withdrawn from cooperation with CSOs, particularly in the regions. Local departments of ministries that previously actively participated in joint initiatives, maintained open communication and even reported on their collaboration with CSOs, have stopped responding to event invitations, written requests and letters, and generally distanced themselves from CSOs.⁵⁸ In some instances, government bodies refused to continue cooperation on previously approved or ongoing activities,⁵⁹ or asked CSOs to downplay or hide any partnerships with international donors.⁶⁰
53. While the chilling effect on civil society-government cooperation is nationwide, CSOs in the regions usually reported more acute and direct challenges in cooperation with local

⁵⁴ 2024 CS 020. “If we register as foreign representatives, people in rural communities will not work or cooperate with us, they will throw tomatoes at us.”

⁵⁵ 2025 CS 068.

⁵⁶ 2025 CS 064.

⁵⁷ 2024 CS 020.

⁵⁸ 2024 CS 026.

⁵⁹ 2025 CS 053; 2025 CS 040.

⁶⁰ 2024 CS 006.

authorities than their counterparts in Bishkek. In some regions, local authorities reportedly explicitly instructed their staff not to cooperate with certain CSOs.⁶¹

VII. Impact of the Law on CSOs supporting SDGs and LNOB

54. CSOs are key actors in supporting progress on reaching the Sustainable Development Goals (SDGs), including through helping to understand who is left behind in reaching the goals and ensuring that they are included. While the Law on Foreign Representatives defines many areas related to the SDGs as non-political, CSOs that work with groups left behind have also felt the Law's impact in limiting their work.⁶²

A. Engagement of CSOs in electoral processes

55. With Parliamentary elections scheduled for 30 November 2025 and Presidential for 2027, the engagement of CSOs in election processes is a significant issue and development partners, including the UN, are planning electoral support.⁶³ Under SDG 16 (Peace, Justice and Strong Institutions), the Kyrgyz Republic has committed to ensuring transparent, participatory governance, including in both its 2020 and 2025 VNRs.⁶⁴ In the past, the Kyrgyz Republic has had robust civil society participation in electoral processes, including election observation.
56. The Law on Foreign Representatives is clear regarding CSOs' engagement in election observation, if they receive foreign funding, they are obligated to register as foreign representatives.⁶⁵
57. The decline in domestic election observation predates the Foreign Representatives Law. The amendments to the Constitutional Law on Elections in 2017 and 2019 established an accreditation system, which gave CEC and election commissions discretion to deny accreditation to CSOs.⁶⁶ In 2021, CEC Resolution No. 677 added an eligibility filter, limiting accreditation to specialized election CSOs with an explicit provision in their

⁶¹ 2025 CS 053; 2025 CS 065; 2025 CS 067.

⁶² The Law states that political activities do not include activities related to science, culture, art, healthcare, protection of public health, social support and citizen welfare, assistance for individuals with disabilities, safeguarding motherhood and childhood, promoting a healthy lifestyle, physical fitness and sports, protection of flora and fauna, and charitable work.

⁶³ The United Nations conducted an Electoral Needs Assessment Mission (NAM) to the Kyrgyz Republic from 9 to 17 September 2024 at the request of the Central Election Commission. Its report and recommendations were endorsed by the government and foresee a role for OHCHR in monitoring and analyzing the law's impact on civil society, particularly its ability to affect CSOs' role in voter/civic education and electoral observation.

⁶⁴ The country's 2020 VNR emphasized that "ensuring transparent and fair elections" is fundamental to democratic development and highlighted "effective public and civic control" See at: https://sustainabledevelopment.kyrgyzstan.github.io/upload/26459VNR_2020_Kyrgyzstan_Report_English.pdf. 2025 VNR, SDG 16 "Electoral process" section, available at: <https://kyrgyzstan.un.org/sites/default/files/2025-08/VNR%202025%20Kyrgyz%20Republic%20Report%20EN.pdf>

⁶⁵ 2025 CS 052, 2025 CS 057; The Law explicitly includes "participation in activities aimed at... the observation of the conduct of elections, referendums" as political activity under Article 2. Therefore, Organizations receiving foreign funding and monitoring elections should register under Article 17, part 3.

⁶⁶ The Constitutional Law "On Elections of the President and Deputies of the Jogorku Kenesh of the Kyrgyz Republic", amended first in 2017 and later in 2019, introduced a requirement that CSOs and their observers in polling stations must be accredited by election commissions and limited CSO observers' deployments to no more than three observers per commission and only one at each polling station.

charters on election monitoring⁶⁷ This led to a significant reduction in CSOs that monitored elections.⁶⁸ In 2020, 77 CSOs monitored the parliamentary elections;⁶⁹ in January 2021, 13 CSOs monitored the Presidential elections, with a further decrease to 7 during the Parliamentary elections in November 2021.⁷⁰

58. Following the adoption of the Law on Foreign Representatives, in 2024, only one independent organization participated in local election monitoring and refrained from making any public statements. Another five specialized and active independent CSOs opted out due to concerns about potential risks under the Law.⁷¹ This was a serious shift in practice, since previously, during and after monitoring of elections, CSOs had made public statements on the transparency of elections and published reports on the results of independent election observation. Interviewed election-related CSOs reported that the Law on Foreign Representatives, the prosecutions of journalists and other civic activists for publicly expressing criticism, as well as legal amendments that further restrict freedom of expression, reinforced concerns and contributed to withdrawal from election observation.⁷² CSOs indicated to OHCHR that authorities reduced engagement with them and took a more cautious stance. They also stressed that registering as a foreign representative could make it harder for them to work with authorities like the CEC,⁷³ which they feared could refuse to accredit them as election observers.

59. In response and as a form of risk mitigation, all election-related organizations interviewed reported self-censorship, including by downplaying their public presence, refusing to monitor elections or criticize the Government,⁷⁴ avoiding organizing big public events⁷⁵ and expressing opinions in media and social media.⁷⁶ Forty-two per cent of those interviewed mentioned a decline in government cooperation, 71 per cent experienced pressure from social media attacks and information campaigns against civil society and 42 per cent reported surveillance and pressure from law enforcement bodies.

⁶⁷ OSCE Office for Democratic Institutions and Human Rights (ODIHR), Kyrgyz Republic Parliamentary Elections, 28 November 2021: ODIHR Election Observation Mission Final Report, p. 23, available at: <https://www.osce.org/files/f/documents/2/f/519087.pdf>. Also see: CEC regulation No.677 from 5 September 2021, available at: <https://shailoo.gov.kg/ru/npacik/postanovlen/677/>.

⁶⁸ Interviews with election observation CSOs. By the time of the 2021, Presidential election, only 13 local CSOs monitored it. OSCE ODIHR, Kyrgyz Republic Early Presidential Election and Referendum, 10 January 2021. See also: https://www.osce.org/files/f/documents/7/0/488587_1.pdf.

⁶⁹ ODIHR Limited Election Observation Mission Final Report, Kyrgyz Republic Parliamentary Election, 4 October 2020, page 19, available at: https://www.osce.org/files/f/documents/7/a/472461_0.pdf.

⁷⁰ Seven citizen observers groups were accredited by the CEC. ODIHR Election Observation Mission Final Report, Kyrgyz Republic Parliamentary Elections, 28 November 2021, page 23, available at: <https://www.osce.org/files/f/documents/2/f/519087.pdf>.

⁷¹ 2025 CS 052; 2025 CS 057; 2025 CS 050; 2025 CS 040; 2025 CS 043.

⁷² Interviews no 2025 CS 051, 057, 056, 060.

⁷³ 2025 CS 036, 2025 CS 040, 2025 CS 050, 2025 CS 052, 2025 CS 057.

⁷⁴ 2025 CS 056; 2025 CS 045; 2024 CS 006; 2025 CS 060: many observers and activists fear that if they expose fraud, they will face legal or administrative consequences, creating a culture of silence, where organizations avoid publicly documenting election violations to protect themselves from government pressure.

⁷⁵ 2025 CS 045.

⁷⁶ 2025 CS 040; 2025 CS 045.

60. At least four election-related organizations based in the regions chose to self-liquidate. These four were among 18 member organizations nationwide that operated under a single, unified election observation CSO.⁷⁷ Interlocutors stated that the impact was especially severe in the regions, where few election-related organizations remained.⁷⁸

B. Environmental CSOs

61. The Kyrgyz Republic's commitments under SDG 13 (Climate Action), SDG 15 (Life on Land), and SDG 6 (Clean Water and Sanitation) recognize environmental protection as critical for sustainable development. The country's 2040 Development Strategy proclaimed the green economy as a priority pillar and committed to reduce greenhouse gas emissions by 44 per cent by 2030 and achieve carbon neutrality by 2050.⁷⁹ The Government has historically partnered with environmental CSOs recognizing their role in monitoring air quality, protecting biodiversity and advocating for environmental justice.
62. However, since the adoption of the Law, those environmental CSOs that have demanded access to environmental information, policy changes or called on authorities to enforce existing environmental laws and regulations, have been increasingly facing difficulties in carrying out their work. Although most environmental CSOs have continued to work without major disruptions, they have become cautious in the current environment. As with other CSOs, 20 per cent have stopped their environmental advocacy and 40 per cent downsized activities that could be considered political.⁸⁰ Eighty per cent of environmental CSOs interviewed reported practicing at least one form of self-censorship.⁸¹

C. People with Disabilities

63. The Kyrgyz Republic has committed to SDG 10 (Reduced Inequalities) and SDG 11 (Sustainable Cities and Communities), which include specific targets for disability inclusion. The country ratified the UN Convention on the Rights of Persons with Disabilities in 2019 and adopted a comprehensive "Accessible Country" State Programme 2023-2030, aiming to ensure full participation of persons with disabilities in all aspects of society. In its 2020 Voluntary National Review, the Kyrgyz Republic recognized as essential partners 30 Organizations of Persons with Disabilities in achieving inclusive development.⁸²
64. Even though CSOs working with people with disabilities should be excluded from the Law's scope, due to the lack of clarity and broad definition of political activities in the Law,

⁷⁷ 2025 CS 052

⁷⁸ 2025 CS 052: "It is difficult to provide exact numbers or percentages, but it can be stated with confidence that the majority of election focused CSOs in the regions are no longer functioning."

⁷⁹ VNR 2020 and 2025. This commitment is further operationalized by the next Green Economy Development Programme for 2025–2029.

⁸⁰ 2025 CS 038, 2025 CS 047, 2025 CS 048, 2025 CS 049, 2025 CS 055.

⁸¹ 2025 CS 055; Self-censorship included avoiding public criticism of the government; declining to participate in public assemblies; refusing to sign or issue public statements; limiting dissemination on social media; declining participation in expert/working groups.

⁸² VNR 2020.

they felt the need to take precautionary measures, fearing that any advocacy on the rights of people with disabilities could be considered as ‘political activity.’

65. Fifty per cent of CSOs that work on disability issues reported practicing self-censorship, decreasing rights-based advocacy and instead carrying out low-visibility service delivery. This has directly impacted their ability to advocate for inclusion policies and the rights of people with disabilities.
66. Fifty per cent of CSOs that work on disability issues also reported a reduction in cooperation with government bodies, including reduced openness, formalistic interactions, refusals to participate in, or even cancelling, previously approved events. Smaller, grassroots regional initiatives, despite providing essential direct assistance, struggled with a lack of government recognition and support on the local level and have been regularly excluded from development planning processes.

D. Women and Girls

67. The Kyrgyz Republic has publicly committed to achieving the gender equality goals under SDG 5 and works with development and other partners on this goal.⁸³ Official statements⁸⁴ and positive reforms⁸⁵ underscore this commitment. The country is implementing a National Strategy on Achieving Gender Equality until 2030 and is preparing a three-year national action plan.⁸⁶ It is party to CEDAW and has adopted core legislation, including the Law on State Guarantees of Equal Rights and Equal Opportunities for Men and Women and the Law on Social and Legal Protection from Family (Domestic) Violence.⁸⁷
68. CSOs that work on issues related to women have filled a vacuum left by the state, providing services that directly impact women's well-being and survival. For example, 17 of the 18

⁸³ See for example [United to advance the 2030 Agenda: Central Asia countries pledge to act for gender equality in the region | UN Women – Europe and Central Asia](#)

⁸⁴ In February 2025, the Minister of Labour, Social Security and Migration stated that “gender equality is enshrined in the Constitution of the Kyrgyz Republic and is the basis of state policy,” Ministry of Labour, Social Security and Migration news (10 Feb 2025), see: <https://mlsp.gov.kg/ru/2025/02/10/kyrgyzstan-predstavil-osnovnye-vyvody-i-rekomendaczii-stranovogo-obzora-gendernogo-ravenstva/>; UN Women ECA press release on the Country Gender Equality Profile (10 Feb 2025), see: <https://eca.unwomen.org/en/stories/press-release/2025/02/kyrgyzstan-presents-preliminary-findings-and-recommendations-of-the-country-gender-equality-profile>; President Japarov also emphasized that “one of the traditional values of the Kyrgyz people is a respectful attitude towards women, children, and the older generation,” asserting that the state must “resolutely suppress any manifestations threatening the safety of women and children,” see: <https://mlsp.gov.kg/ru/2025/02/10/kyrgyzstan-predstavil-osnovnye-vyvody-i-rekomendaczii-stranovogo-obzora-gendernogo-ravenstva/>

⁸⁵ Legislative changes include a new Labour Code (in force from late January 2025) that lifted long-standing occupational bans for women, limiting restrictions to pregnant and lactating workers—an outcome following sustained advocacy by civil society. ADC Memorial (3 Feb 2025): new Labour Code lifts broad occupational bans, see: <https://adcmemorial.org/en/news/kyrgyzstan-lifted-professional-bans-for-women-an-important-stage-of-the-alljobs4allwomen-campaign/>; Presidential decree of March 2024 approving the State Programme to Support Women’s Leadership until 2030, 24.kg (9 Mar 2024): presidential decree approving the State Programme to Support Women’s Leadership to 2030, see: https://24.kg/english/288603_State_program_to_support_womens_leadership_approved_in_Kyrgyzstan/; Resolution of Cabinet of Ministers of Kyrgyz Republic adopting National Strategy for Achieving Gender Equality until 2030, see: <https://cbd.minjust.gov.kg/159472/edition/1189691/ru>.

⁸⁶ UNDP Kyrgyzstan, Gender Equality factsheet / reference to National Strategy to 2030, see: <https://www.undp.org/kyrgyzstan/publications/undp-fact-sheet-gender-equality-2025>.

⁸⁷ Law “On Social and Legal Protection from Family (Domestic) Violence,” and Law “On State Guarantees of the Equal Rights and Equal Opportunities for Men and Women.”

crisis centers for survivors of domestic violence are run by CSOs,⁸⁸ offering shelters, legal assistance, and psychological support to women affected by domestic and gender-based violence, human trafficking and migration-related abuses.⁸⁹ Human rights protection CSOs provide free legal aid for vulnerable populations, with 70 per cent of their cases involving domestic violence, and have successfully advocated for legislative reforms such as the abolition of professions prohibited for women.⁹⁰ In addition, gender equality CSOs in the Kyrgyz Republic have historically achieved major legislative and policy victories despite their underrepresentation in parliament and high levels of government through collaborative strategies championing reform.

69. However, there has been a growing public discourse, supported by legislative changes, stemming from the 2021 Constitution, pitting traditional and moral values and the “public conscience of the people of the Kyrgyz Republic” against “feminism.”⁹¹ Public discourse, particularly in rural areas, has increasingly expressed a toxic narrative that links anti-government “NGOs,” foreign funding, LGBTQ+ advocacy and feminism and portrays them as promoting a harmful foreign agenda that undermines national identity, ‘traditional values’ and cultural norms. The introduction of the Law on Foreign Representatives has further reinforced this negative trend.
70. OHCHR ROCA conducted interviews and surveys with 62 organizations that dedicate work to promoting women’s rights, providing social services, supporting survivors of gender-based violence and advancing women’s political and economic participation. It found that the Law has led to a significant shift away from women’s rights programming and advocacy. Forty-five per cent of CSOs interviewed that work on issues related to women reported consciously scaling back or completely abandoning advocacy and political empowerment. The prevailing perception among these CSOs is that only service provision, such as running shelters, providing psychological support for victims of domestic violence and basic education is still acceptable. Interlocutors noted continued government support for crisis centers and shelters, including through referrals of women and some financial or other material support.⁹² At the same time, reductions in international development funding that kicked in after the Law on Foreign Representatives was adopted, have negatively impacted the provision of such services,⁹³ leaving women CSOs having to both avoid “political” work, due to the Law and reduce services due to funding cuts.
71. As with other CSOs, women’s organizations also started to practice self-censorship, scaling down their visibility and public communication, even on issues related to reducing violence and promoting health, and avoiding criticism of government policies.⁹⁴ Thirty-one per cent of the 62 women’s organizations contacted reported having changed their charters,

⁸⁸ Forum of Women’s NGOs of Kyrgyzstan, “Coordination of gender-based and domestic violence protection services in existing shelters and crisis centers in the Kyrgyz Republic” (14 September 2023), available at <https://forumofwomensngos.kg/2023/09/coordination-vaw-crises-senters-in-kyrgyzstan/?lang=en>

⁸⁹ 2025 CS 043, 2025 CS 044, 2025 CS 076, 2025 CS 078, 2025 CS 079, 2025 CS 081

⁹⁰ 2025 CS 059

⁹¹ See for example, [Decisions of Constitutional Court can be reviewed in Kyrgyzstan - | 24.KG](#)

⁹² Interviews no. 2024 CS 023 and 2025 CS 044.

⁹³ 2025 CS 044; 2025 CS 080; At least 12 out of 42 women focused CSOs have chosen to pause or shut down their activities.

⁹⁴ Interview no. 2025 CS 079.

removing terms such as “gender equality,” “women’s rights,” and “advocacy.”⁹⁵ At least 42 per cent downsized activities or shifted away from rights-based activities toward areas that are less likely to be considered as political, such as education, reforestation and agriculture promotion, healthcare or economic development. Of 62 CSOs contacted, four organizations self-liquidated.

72. Reports from organizations in both Bishkek, but even more so in the regions, confirm a significant, widespread retreat from programs for women’s participation in local councils, leadership trainings and political rights education. All 10 interviewed women CSOs that previously worked on these issues have ceased, scaled back, or significantly altered their programs.
73. Apart from the impact on CSOs that work on issues related to women, the Law has also disproportionately affected women, as the majority workforce and leadership of CSOs. Women constitute the overwhelming majority of the workforce and leadership of CSOs that potentially fall under the Law,⁹⁶ accounting for 70 per cent of leaders⁹⁷ and up to 80 per cent of staff within CSOs that work on issues related to women specifically.⁹⁸ Out of the 82 CSOs interviewed, 66 of them (80 per cent) were represented by women.
74. Many women are channeled into lower-paid service professions and face significant hurdles to advancement in male-dominated fields and in top-tier government and business leadership.⁹⁹ In this context, the CSO sector, particularly organizations focused on human rights, social services, healthcare and education, provides a critical career track where women’s skills are valued and leadership is attainable. The CSO sector is therefore a place where women can find meaningful employment, build careers, develop leadership skills, and secure a platform for collective action and influence that is often denied in traditional state and market structures.

⁹⁵ Interview no. 2025 CS 037. Interview no. 2025 CS 064.

⁹⁶ The majority of those in leadership positions in sport’s CSOs and business associations are men, while women are the majority in other more human rights and social support-oriented sectors. On the basis of analysis seen by ROCA, the activities of non-profit organizations based on state reported data (for the period 2019-2023), show the gender participation in CSO as almost equal. However, these statistics do not indicate the strong division of labour, where men are represented in sport and business associations, while women are the significant majority in other CSOs, which do more political work and are therefore impacted by the Law on Foreign Representatives.

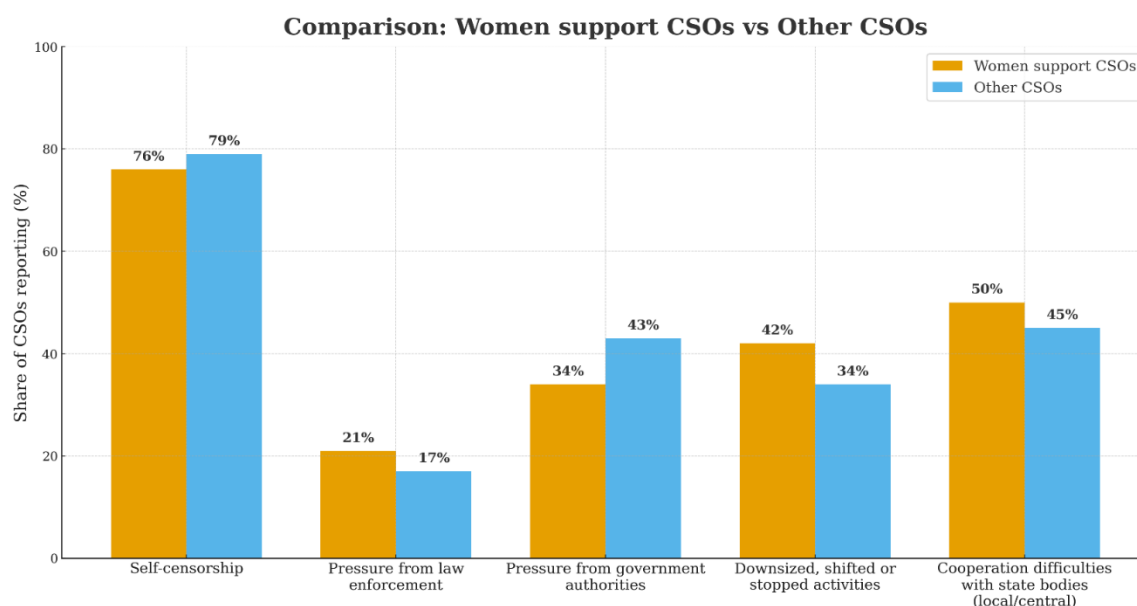
⁹⁷ Toktonazarova, Aigul. “Kyrgyzstan: Fight for gender quotas pays off”. Gender Links. Available at https://genderlinks.org/za/wp-content/uploads/imported/articles/attachments/kyrgyzstan_fight_for_gender_quotas_pays_off.pdf

⁹⁸ Commercio, Michele E. “Women in Kyrgyzstan - Electorally Marginalized but Legislatively Influential: A Theory of Transactional Activism.” *Politics & Gender*, vol. 18, 2022, pp. 605-639. Available at: <https://doi.org/10.1017/S1743923X20000689>

⁹⁹ Outside the CSO sector women workers are concentrated in underfunded, low-paying public service sectors like education and healthcare, earning on average only 75 per cent of men’s salaries. See: *National Statistical Committee of the Kyrgyz Republic and UN Women, Sustainable Development Goals and Gender in the Kyrgyz Republic* (Bishkek, 2023), p. 49. Available at: <https://data.unwomen.org/sites/default/files/documents/Publications/2023/Kyrgyz-SDG-gender.pdf>

Furthermore, despite progressive legal frameworks, women face a significant “political glass ceiling,” with low representation in senior government roles across all branches. Following the 2021 elections, women held only 21-22 per cent of seats in Parliament. The disparity is even more pronounced in the executive branch: in early 2022, the cabinet included only one female minister out of 19, and by August 2022, representation remained critically low at 10 per cent, with just two women in a 21-member cabinet. See: *Working Group on discrimination against women and girls, Report of the Working Group on discrimination against women and girls on its visit to Kyrgyzstan*, (8 May 2023), para.13. Available at: <https://docs.un.org/en/A%2FHRC%2F53%2F39%2FAdd.1>

75. By systematically weakening CSOs, the Law on Foreign Representatives and accompanying rhetoric have been directly dismantling one of the few professional spheres where women have achieved significant employment and leadership, severing essential services for women's physical and economic security, and silencing their collective political voice, making it harder to achieve the government's commitments under SDG 5 on gender equality.



E. Youth

76. The Kyrgyz Republic's commitments under SDG 4 (Quality Education) and SDG 8 (Decent Work and Economic Growth) include targets on youth empowerment and development.¹⁰⁰
77. ROCA interviewed 19 CSOs carrying out activities dedicated to youth. They reported being subject to increased surveillance or pressure from security services (42 per cent), carrying out self-censorship (84 per cent), changing their charters (26 per cent), and downsizing their activities or advocacy work for the rights of youth (47 per cent). They also reported incidents of the SCNS calling school and university personnel, warning them not to allow their premises to be used for their youth events organized on topics such as youth rights. Consequently, events were cancelled by the institutions.¹⁰¹ Due to negative public rhetoric, the public perception of youth CSOs also worsened, with young participants (14–18-year-olds) looking at CSOs with suspicion, and in some cases, parents refusing to let their children join youth workshops which, reportedly, has been a new tendency.

¹⁰⁰ Kyrgyzstan National Development Program until 2026 prioritizes youth as key drivers of sustainable development. The State Youth Policy Framework 2020-2030 aims to ensure meaningful youth participation in decision-making processes and economic opportunities.

¹⁰¹ 2024 CS 013.

F. LGBTQ+

78. While SDG 10 (Reduced Inequalities) and SDG 16 (Peace, Justice and Strong Institutions) call for inclusive societies where no one faces discrimination, the Kyrgyz Republic's approach to LGBTQ+ rights has become increasingly restrictive. Over recent years, the LGBTQ+ movement has become extremely marginalized. LGBTQ+ organizations have been specifically targeted, including through hate speech, smear campaigns, threats of arrest, acts of violence, intimidation and legal restrictions.¹⁰² Public discourse, shaped by political figures and conservative commentators, has framed LGBTQ+ advocacy as a foreign threat to national values.¹⁰³
79. A restrictive law prohibiting “harmful information for children”¹⁰⁴ put further pressure on freedom of expression in relation to rights of LGBTQ+ persons.¹⁰⁵ Any communication or activity on behalf of these groups or public awareness about the issues they face could potentially be labelled as “harming children” and fines of USD 290 for promoting “non-traditional values” or ‘harmful content for children’ could be imposed.
80. Before the Law on Foreign Representatives was adopted, security services carried out visits to the homes of LGBTQ+ individuals and publicly disseminated personal information of members of the LGBTQ+ community.¹⁰⁶ Under such pressure, LGBTQ+ organizations believed that they were one of the primary targets of the Law on Foreign Representatives. The Law led their CSOs to stop public activities, appearances and statements, remove the organizations’ names from events and alternative reports submitted to UN human rights mechanisms and even the self-liquidation of a major LGBTQ+ CSO in the Kyrgyz Republic.¹⁰⁷ LGBTQ+ organizations limited their outreach and abandoned rights-based advocacy. Such pervasive self-censorship, including the removal of online resources and

¹⁰² 2024 CS 008. In August 2023, a law was adopted amending the “Law on Measures to Prevent Harm to the Health of Children...”. This law effectively criminalizes any positive or neutral discussion of LGBTQI+ issues by classifying information about “non-traditional sexual relations” as harmful to children, equating it with violent or pornographic content.

¹⁰³ 2024 CS 003; Nadira Narmatova spoke about NGOs, divorces, gays, and da'awatchy. Available at: https://kaktus.media/doc/473185_nadira_narmatova_vyskazalas_ob_npo_razvodah_geiah_i_daavatchy_video.html; “A debate has flared up in parliament over the women's march.” Radio Azattyk, March 14, 2019. Available at: https://rus.azattyk.org/a/kyrgyzstan_parliament_march_discussion/29820459.html; Protection from discrimination. The deputy believes that LGBT people can take advantage of the law. Available at: https://24.kg/vlast/283008_zaschita_otdiskriminatsii_deputat_schitaet_chno_zakonom_mogut_vospolzovatsya_lgbt/;

Activists in Kyrgyzstan are protesting a US State Department grant to the LGBTQI+ organization “Kyrgyz Indigo,” alleging it promotes “transgender ideology” in schools, which they argue contravenes the nation's constitution. Available at: https://www.vb.kg/doc/425677_gosdep_ssha_vydelil_kyrgyz_indigo_grant_aktivisty_vystypaut_protiv.html

¹⁰⁴ The Law of Kyrgyz Republic, adopted on 9 August 2023, ‘On Amendments to Certain Legislative Acts of the Kyrgyz Republic (to the Code of Offenses of the Kyrgyz Republic, the Laws of the Kyrgyz Republic “On Measures to Prevent Harm to the Health, Physical, Intellectual, Mental, Spiritual, and Moral Development of Children in the Kyrgyz Republic”)’.

¹⁰⁵ UN human rights mechanisms and international organizations widely criticized the law for embedding anti-LGBTQ+ discrimination, restricting freedom of expression, access to information and violating Kyrgyzstan’s obligations under international human rights law. Ref. Concluding observations E/C/12/KGZ/CO/4, 11 October 2024, par.22-23; European Parliament resolution of 13 July 2023 on the crackdown on the media and freedom of expression in Kyrgyzstan. Available at: [link](#). Amnesty International, available at: [link](#). Human Rights Watch, available at: [link](#).

¹⁰⁶ 2024 CS 003, 2024 CS 008, 2024 CS 024.

¹⁰⁷ 2024 CS 003, 2024 CS 024.

destruction of educational materials, has risked severely limiting access to vital health, legal and social services for a deeply marginalized community.

81. The stigma surrounding foreign funding and its perceived connection to LGBTQ+ rights, has become particularly acute.¹⁰⁸ In rural areas especially, the term “foreign representative” is often equated with promoting LGBTQ+ agendas, an accusation that can severely damage an organization’s reputation, erode trust within communities and provoke public backlash.
82. The systematic dismantling of organizations that traditionally served and advocated for LGBTQ+ individuals actively pushes this community further behind, directly contradicting the LNOB commitment to ensure that all segments of society are included in development and enjoy fundamental human rights.

G. Sex Workers, People Living with HIV/AIDS and Drug Users

83. Under SDG 3 (Good Health and Well-being),¹⁰⁹ target 3.3 aims to end the AIDS epidemic by 2030. The National HIV Programme 2022-2026 in the Kyrgyz Republic aims to reduce new HIV infections by 50 per cent and ensure 95 per cent of people living with HIV know their status. The 2020 VNR acknowledged that while HIV prevalence remains below 0.2 per cent in the general population, key populations including sex workers and people who inject drugs require targeted interventions delivered primarily through civil society organizations.¹¹⁰
84. The Law on Foreign Representatives and associated legislation, such as the law on “harmful information for children,” have created a highly restrictive environment for organizations assisting sex workers, people living with HIV/AIDS and drug users in the Kyrgyz Republic.
85. Sex workers have been subjected to crackdowns for a long time, intensified in a “cleanse the city” campaign in November 2023 by the SCNS, which publicly disseminated names, photos, home addresses, and family information of sex workers.¹¹¹ In August 2024, a law

¹⁰⁸ During parliamentary discussions on the “foreign representatives” law, a video was shown alleging harm caused by NGOs, including through “LGBT propaganda”. Individual members of parliament have made similar public statements. For instance, MP Bakytbek Sydykov stated that talk of “homosexuality” made him “sick to [his] stomach” and that “a man is a man and a woman is a woman”. MP Zhyldyz Sadyrbaeva alleged that funds intended for fighting HIV were instead being used to build the LGBT and sex worker movements. Available at: https://www.ilga-europe.org/files/uploads/2024/02/2024_kyrgyzstan.pdf; <https://tgeu.org/kyrgyzstan-passes-anti-lgbti-propaganda-law/>.

¹⁰⁹ The Kyrgyz Republic reaffirmed its commitment to SDG 3 (Good Health and Well-being) in its VNR 2025 and supported by two main laws: “On Health Protection of Citizens of the Kyrgyz Republic” and “On Public Health” in early 2024. The “Healthy Person – Prosperous Country” program for 2019-2030 aims to improve primary health care.

¹¹⁰ It also noted that 67 per cent of HIV prevention funding came from international donors, making these programs vulnerable to funding restrictions.

¹¹¹ Interview no. 2025 CS 072. Turdubek Alymbayev, “Brothels, webcams and security forces: what is happening in the world of prostitution in Bishkek today”, 24.kg, 10 June 2025. Available at: https://24.kg/proisshestviya/332022_pritonyi_vebkam_isiloviki_cho_proishodit_vmire_prostitutsii_vbishkeke_segodnya/; “The SCNS circulated photos of sex workers. Is this incompetence or conscious populism?”, *Kaktus.media*, 29 November 2023. Available at: https://kaktus.media/doc/491374_gknb_rasprostranil_foto_seks_rabotnic_eto_nekompetentnost_ili_osoznannyy_popylizm.html; “And the faces of pedophiles are hidden.” The methods of the SCNS in the fight against prostitution have raised questions”, *Radio Azattyk*, 29 November 2023. Available at: <https://rus.azattyk.org/a/32706290.html>; Timur Imankulov, “The SCNS published photos

was adopted that officially classified sex work as an administrative offense,¹¹² intensifying existing systemic harassment. Criminalization and crackdowns have forced many sex workers underground, resulting in a concerning rise in HIV prevalence from 2 per cent to 4.4 per cent within the group over only 1.5 years, and drastically reducing their access to prevention programs.¹¹³

86. CSOs that work with key groups reported that in response to the Law on Foreign Representatives, they modified their charters, removing references to advocacy, and stopped their previously core activities of advocating for changes in laws and practices¹¹⁴ and turned instead to only service provision.¹¹⁵ Cooperation between CSOs and Government also deteriorated. Previously CSOs were involved in consultations and had working level communication with law enforcement, whereas now CSOs report fearing repercussions for their activities, including potential imprisonment, which in turn has led to self-censorship.¹¹⁶
87. Vulnerable groups, such as sex workers and drug users, have been pushed further underground and due to the Law on Foreign Representatives, their organizations have not been able to publicly advocate on their behalf and have reduced capacity to provide essential health, legal and social services to these people.

VIII. Conclusion

88. The Kyrgyz Republic has made strong commitments to the 2030 Sustainable Development Agenda and “multilateral and cross-sectoral” partnerships in achieving the SDGs. However, the Law on Foreign Representatives, combined with other restrictive legislation and practices, has significantly weakened the ability of civil society to support the achievement of the SDGs. The vague definition of ‘political activity’, stigmatization, negative rhetoric and increase in surveillance by law enforcement bodies have created a serious chilling effect on civil society raising concerns of freedom of expression, and – as a result of undue interference in the operations of CSOs – the right to freedom of association. In response, the majority of CSOs began to self-censor. CSOs reduced their activities, scaled down programs and systematically disengaged from advocacy and rights-based work. Civil society’s crucial watchdog role — identifying problems, gathering evidence, developing and advocating solutions and engaging constructively with authorities to support them in fulfilling the Government’s international commitments has been weakened. The retreat

of prostitutes in accordance with the Constitution and laws of the KR”, *Kyrgyz National University named after Jusup Balasagyn*, 30 November 2023. Available at: https://www-old.knu.kg/ru/index.php?option=com_content&view=article&id=9916:2023-11-30-04-14-50&catid=124:2010-04-21-10-36-57&Itemid=281.

¹¹² Law of the Kyrgyz Republic No. 153 (29 July 2024) established administrative penalties for sex work by introducing Article 109-2 (“Engaging in Prostitution”) into the Code on Misconduct. The penalty is a fine of 20,000 som (USD 228) or administrative arrest for three to seven days. Prior to this, sex workers were not subject to specific criminal or administrative penalties, though systemic harassment persisted.

¹¹³ The organization’s outreach has dropped sharply—from 2,500 people to only 100–150. Interview no. 2025 CS 072.

¹¹⁴ 2025 CS 072.

¹¹⁵ Organizations report no longer carrying out advocacy for decriminalization of sex work or for establishing opioid replacement therapy (ORT) and other harm reduction programs. Interview no. 2025 CS 072.

¹¹⁶ The reversal of previous harm reduction strategies is dismantling public health gains, leading to a renewed spread of HIV and Hepatitis C as preventative outreach becomes impossible in a climate of fear and persecution. Interview no. 2025 CS 073.

from advocacy has not been limited to human rights groups but has extended to service-provision organizations that serve vulnerable groups and environmental advocates who now avoid work that could be construed as political.

89. In this way, the Law has weakened the ability of CSOs to influence development policies. Half of the 115 CSOs contacted reported worsening cooperation with local authorities. This has contributed to the isolation of organizations, particularly in the regions, and weakened vital partnerships that once supported community development. The accompanying stigmatization, branding CSOs as “foreign agents” or as undermining Kyrgyz traditions has eroded public trust and demoralized many CSOs in the sector.
90. These compounding impacts have particularly affected CSOs that work with the most vulnerable populations. They risk harming progress towards achieving the Kyrgyz Republic’s commitments to “leave no one behind” and the SDGs.

IX. Recommendations

91. Based on the findings outlined above, the following recommendations aim to safeguard civic space and align national laws and practice with the international human rights obligations of the Kyrgyz Republic:

To the Government:

- Review the Law on Non-Commercial Organization and its subsequent amendments to return to a free and enabling environment for civil society fully in line with international human rights standards and the country’s international legal obligations, in particular with respect to Articles 19 and 22, ICCPR.
- Ensure that CSOs are not required to register as foreign representatives for their legitimate exercise of rights, including freedom of expression and association.
- Change government rhetoric to highlight the positive contributions of CSOs to national development and SDG achievement. Encourage positive messages about government-CSO cooperation. Support balanced media coverage of civil society’s role.
- Create a permanent consultative platform between the Government and CSOs that meets regularly. Mandate consultation with CSOs in SDG-related policy development.
- Issue clear directives to local authorities encouraging partnerships with CSOs within existing legal frameworks. Establish regional coordination councils with guaranteed CSO representation.
- Bring Articles 278(3) of the Criminal Code of the Kyrgyz Republic in compliance with Articles 19, 21 and 22 of the International Covenant on Civil and Political Rights, as recommended by UN human rights mechanisms and ensure legitimate freedom of assembly, association and expression are not criminalized.

To the Ombudsperson:

- Monitor respect for fundamental freedoms, including the right to freedoms of expression and association, report and make recommendations on civic space in Kyrgyz Republic and hold regular consultations with CSOs.

To International Partners:

- Continue to fund independent CSOs, in particular their core operations.
- Support the creation of CSO coalitions, including by building stronger alliances between different types of CSOs and explore funding mechanisms that support cooperation.



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