

ANALYSIS

of a draft law of the Kyrgyz Republic “On amendments in certain legislative acts of the Kyrgyz Republic” (Laws of the Kyrgyz Republic “On non-commercial organizations”, “On state registration of legal entities, branches (representative offices)”)

On December 31, 2019, on the official website of Jogorku Kenesh (Parliament) of the Kyrgyz Republic, a draft law of the Kyrgyz Republic “On amendments in certain legislative acts of the Kyrgyz Republic” (Laws of the Kyrgyz Republic “On non-commercial organizations”, “On state registration of legal entities, branches (representative offices)”) was posted for public discussion. The initiator is a deputy of the Jogorku Kenesh Raimkulov B¹.

It is worth mentioning that the draft law requires non-commercial organizations (NGO's) to provide additional reporting to state bodies with a large amount of information about its performance management, including information of income sources, expenses, size and composition of the employees and their wages. Therefore, the proposed initiative is, in fact, another effort by the authorities to assume greater control over the non-commercial sector.

Taking into account the above, and taking into account that the Public Foundation “Legal Clinic “Adilet” constantly monitors legislative initiatives that affect human rights and freedoms, our lawyers had analyzed the draft regulations for consistency with the Constitution and international human rights standards. The analysis revealed several legal norms that contain threats to democratic values and fundamental human rights. Certain norms of the initiated project directly contradict the legislation of the Republic.

1. The draft law proposes to present article 17 of the Law “On non-commercial organizations” in the following wording:

“1. A non-commercial organization provides information of its activities to the authorized body in the field of official statistics and to tax authorities, founders and other persons under the legislation of the Kyrgyz Republic and the constituent instruments of the non-commercial organization.

The size and composition of incomes of the non-commercial organizations, as well as information of the size and composition of the non-commercial organizations' property, its expenses, number and structure of employees, their wages, the use of the unremunerated work activities of the citizens in non-commercial organizations' activity, cannot be a subject of commercial secrecy.

2. A non-commercial organization that operates at the expense of grant, budgetary and other funds and supplies provided at no cost, annually until April 1 it provides information on the sources of formation and directions of the property used on the specialized site of the registering authority.

The form and procedure for providing the information are determined by the Government of the Kyrgyz Republic.”

2. At the same time, part 3 of article 12 of the Law “On state registration of legal entities, branches (representative offices)” is proposed to amend, according to which, when a legal entity

¹ Official website of the Jogorku Kenesh of the Kyrgyz Republic. – available at <http://kenesh.kg/ru/article/show/6241/na-obshtestvennoe-obsuzhdenie-s-31-dekabrya-2019-goda-vinositsya-proekt-zakona-kirgizskoy-respubliki-o-vnesenii-izmeneniy-v-nekotorye-zakonodatelnyie-akti-kirgizskoy-respubliki-zakoni-kirgizskoy-respubliki-o-nekommercheskih-organizatsiyah-o-gosudarstvennoy-registratsii-yuridicheskikh-lits-filialov-predstavitelystv>.

is re-registered, non-commercial organizations will additionally submit to the registration authority:

- previous constituent documents;
- constituent documents in two copies in the new edition or as amended and supplemented;
- information of the flow of funds sources and other property from the moment of initial registration;
- statistical reporting, approved by the authorities of official statistics;
- certificate of the tax service authorities on the existence or absence of tax debts.

3. Besides, the draft law proposes that the tax authority and (or) the Social Fund authority may apply to the court for compulsory liquidation of a legal entity if it fails to submit monthly reports to the tax authority and (or) the Social Fund authority within one year, instead of two years, as provided in the current version of article 14 of the Law “On state registration of legal entities, branches (representative offices)”.

4. Therefore, the draft law initiated by the Deputy of the Jogorku Kenesh Rayymkulov B. is aimed at strengthening the State regulation of non-commercial organizations by establishing several commitments to provide information on professional activities that NGOs already indicate in their reports according to the current legislation.

5. In the Kyrgyz Republic, systematic efforts are being undertaken towards bringing the non-commercial sector under tight State control by initiating draft laws aimed at narrowing the democratic space, as well as threatening the Association’s freedom, which is related to universally accepted principles and norms of international law. In 2013-2015, the Jogorku Kenesh attempted to amend the Law “On non-commercial organizations”. The amendments provided for empowering NGOs with the status of foreign agents, which placed some disproportionate restrictions on them and might seriously cause difficulty for human rights organizations to receive international support. Thanks to the active position of civil society and international organizations and after a two-year-old struggle, the Parliament was forced to reject these legislative amendments.

6. European Commission for Democracy through Law (Venice Commission) and OSCE Office for Democratic Institutions and Human Rights (OSCE/ODIHR) responded promptly to the action of the authorities of Kyrgyzstan by preparing and referring their conclusion on the mentioned draft law. In particular, it noted that freedom of association is "an essential prerequisite for other fundamental freedoms".¹ It is closely intertwined with freedom of expression, and assembly, as well as with other human rights (freedom of religion, right to privacy, the prohibition of discrimination, etc.). It is "an individual human right which entitles people to come together and collectively pursue, promote and defend their common interests".² Freedom of association is at the core of a modern democratic and pluralistic society. It serves "as a barometer of the general standard of the protection of human rights and the level of democracy in the country". Although freedom of association is not an absolute right, it can be limited, or derogated from, only under the strict conditions stipulated in human rights instruments (see Articles 4 and 22(2) of the ICCPR).

Non-governmental organizations (NGOs) play a crucial role in modern democratic societies, allowing citizens to associate to promote certain principles and goals. Such public engagement, parallel to that of participation in the formal political process, is of paramount importance and represents a crucial element of a healthy civil society. Members of NGOs, as well as NGOs themselves, enjoy fundamental human rights, including freedom of association and freedom of expression.

These rights are enshrined in numerous international legal instruments, such as the 1948 Universal Declaration of Human Rights (Articles 19 and 20), and the 1966 International Covenant on Civil and Political Rights (Articles 19 and 22). They are also granted under the 2007 Constitution of the Kyrgyz Republic (Articles 31 and 35).²

7. The Venice Commission and the OSCE/ODIHR recall that under current human rights standards, "states have a right to satisfy themselves that an association's aim and activities conform with the rules laid down in legislation", provided they do so "in a manner compatible with their obligations under the /European/ Convention" and other international instruments. While it is understood that state bodies should be able to exercise some sort of [limited] control over non-commercial organizations' activities to ensure transparency and accountability within the civil society sector, such control should not be unreasonable, overly intrusive or disruptive of lawful activities. Excessively burdensome or costly reporting obligations could create an environment of excessive State monitoring over the activities of non-commercial organizations. Such an environment would hardly be conducive to the effective enjoyment of freedom of association. Reporting requirements must not place an excessive burden on the organization.

State supervision should be limited to cases where there are reasonable grounds to suspect that serious breaches of the law have occurred or are imminent. In the absence of evidence to the contrary, the activities of associations should be presumed to be lawful.³

8. In this case, the principles and norms contained in these international documents constitute international human rights standards, in which the Kyrgyz Republic should fully respect them. According to part 3 of article 6 of the Constitution, international treaties to which the Kyrgyz Republic is a party, as well as universally accepted principles and norms of international law, have entered into force following the procedure established by law, and are an integral part of the legal system of the Kyrgyz Republic. The procedure and conditions for the application of international treaties and universally accepted principles and norms of international law are determined by laws. Part 1 of article 40 of the Constitution guarantees everyone judicial protection of their rights and freedoms provided for by the Constitution, laws, international treaties to which the Kyrgyz Republic is a party, and universally accepted principles and norms of international law.

The Universal Declaration of Human Rights is one of the main international treaties in the field of human rights and represents a set of universally accepted principles and norms of

² Articles 14, 15, 16 of the Venice Commission and OSCE/ODIHR joint interim opinion on the draft law amending the law on non-commercial organizations and other legislative acts of the Kyrgyz Republic adopted by the Venice Commission at its 96th Plenary Session (Venice, 11-12 October 2013) -

[https://www.venice.coe.int/webforms/documents/?pdf=CDL-AD\(2013\)030-e](https://www.venice.coe.int/webforms/documents/?pdf=CDL-AD(2013)030-e).

³ Articles 69 and 76 of the Venice Commission and OSCE/ODIHR joint interim opinion on the draft law amending the law on non-commercial organizations and other legislative acts of the Kyrgyz Republic adopted by the Venice Commission at its 96th Plenary Session (Venice, 11-12 October 2013) -

[https://www.venice.coe.int/webforms/documents/?pdf=CDL-AD\(2013\)030-e](https://www.venice.coe.int/webforms/documents/?pdf=CDL-AD(2013)030-e).

international law, therefore, it remains an integral part of the legal system of the Kyrgyz Republic.

The Kyrgyz Republic is a party to the ICCPR⁴ and the Vienna Convention on the law of treaties⁵, which, in particular, established that every treaty in force is binding upon the parties to it and must be performed by them in good faith (Article 26 “Pacta sunt servanda”). At the same time, a party may not invoke the provisions of its internal law as justification for its failure to perform a treaty (article 27 “Internal law and observance of treaties”).

In addition to the aforementioned the international and constitutional norms and guarantees, regulations on the legal force of international treaties contained in articles 31 and 32 of the Law “On international treaties of the Kyrgyz Republic” according to which international treaties must be liable for strict compliance and binding on the Kyrgyz Republic from the moment of entry into force for our country.

Based on the above, the Kyrgyz Republic in and though all state institutions and officials must abide by all mentioned international human rights standards. Moreover, our state has made commitments to implement them in its national legislation in an appropriate manner. At the same time, the regulations made to the legislative acts of Kyrgyzstan should not in any way restrict or limit the freedoms guaranteed by universally accepted principles and norms of international law.

Besides, in the light of the treatment given to the issue of legal force of the international treaties, it is worth noting that known as non-treaty norms, which are contained in various declarations, manuals, minimum standards, etc.

It seems that such norms must necessarily be adhered, since:

- ✓ they are derived from international treaties themselves, revealing their meaning and significance in detail;
- ✓ they are often referred to as General principles of international law in the theory of international law and from this point of view, they are an integral part of the legal system of Kyrgyzstan (part 3 of article 6 of the Constitution).

9. It should be noted that in August 2019, the Ministry of economy launched a similar initiative, offering to extend the law “On the procedure for conducting inspections of business entities” also to the non-profit sector. Lawyers of the Legal Clinic “Adilet” conducted a legal analysis of the draft law for compliance with the Constitution and international human rights standards, which revealed many regulations that unreasonably and disproportionately restrict the right to freedom of association, as well as some other fundamental human rights. The results of the analysis were sent to the Government and the Ministry of Economy as formal proposals under the public discussion and were published in the media.

On October 4, 2019, following the examination of proposals and comments to the draft law received from civil society and business representatives, the Ministry of Economy decided to suspend and withdraw the draft law in the wording presented.

⁴ The Kyrgyz Republic acceded to the International Covenant on civil and political rights by resolution No. 1406-XII of the Jogorku Kenesh of the Kyrgyz Republic "On the accession of the Kyrgyz Republic to International human rights treaties" adopted at January 12, 1994;

⁵ The Kyrgyz Republic acceded to the 1969 Vienna Convention on the Law of Treaties under the law of the Kyrgyz Republic “On the accession of the Kyrgyz Republic to the Vienna Convention on the Law of Treaties, adopted at May 23, 1969”.

10. The Constitution of the Kyrgyz Republic contains fundamental international human rights standards, which are also an integral part of the legal system of our country, i.e. they are binding on all subjects, especially on the state bodies. The rights to personal privacy, freedom of expression, freedom of speech and the press, freedom of conscience and religion, freedom of peaceful assembly, freedom of association, access to information and other fundamental rights are guaranteed by the Constitution of Kyrgyzstan to everyone⁶. Therewith, the rights and freedoms of an individual and citizen may be limited by the Constitution and laws to protect national security, public order, public health and morals, protection of the rights and freedoms of others. Such restrictions can be introduced by the peculiarities of military or another public service. The restrictions introduced must be commensurate with these purposes. The law may not impose restrictions on rights and freedoms for other purposes and to a greater degree than provided for in the Constitution⁷.

Similar standards regarding the permissible restriction of human rights are also contained in the main international legal instruments in the field of human rights and freedoms, including articles 17-19, 21, 22 of the International Covenant on civil and political rights.

However, the analysis shows that the changes proposed by the initiator do not fully meet the requirements mentioned above regarding the fundamentals, commensurability and permissible goals for restricting human rights, which is expressed in state intervention and regulation of the implementation of fundamental rights and freedoms of citizens.

11. It should be noted that all legal entities, including NGOs, carry out their activities under the legislation of Kyrgyzstan, in particular, guided by the regulations of the Civil code, the law "On state registration of legal entities, branches (representative offices)", the law "On non-commercial organizations" and many other regulations.

12. The activities of NGOs are also regulated by the regulations of the Kyrgyz legislation on tax payments, social contributions, and statistical reporting according to which these organizations on an ongoing basis submit relevant reports to the tax service, social fund, and statistical agencies. The mentioned state authorities, in case of determining inaccuracies or potential violations of laws, have the right to conduct an in-depth audit or to request relevant documents and other information. Where there are suspicions of committing serious violations by the NGOs, the authorized bodies can send materials to law enforcement agencies, for example, to the State financial police service under the Government (Financial police) for holding pre-trial proceedings and giving a legal assessment for any crime indications.

13. Furthermore, the relevant state registration authorities represented by the Ministry of justice, the State Agency for land resources under the Government, and the State registration service under the Government, have databases on all legal entities registered in Kyrgyzstan, their founders and managers, addresses of residence, PIN and other personal information, as well as available movable and immovable property, etc.

14. Also, the authorized state bodies, including financial intelligence agencies, regularly collect and verify information about various financial transactions (transactions, money transfers) to comply with legislation on the prevention of the terrorist financing and the legalization of funds obtained by criminal means (money-laundering). The competent government services monitor and control cash flow to the Republic therefore, when issues of funding sources for NGOs activity arise, public authorities can take legal action.

⁶ Articles 29, 31-35 of the Constitution of the Kyrgyz Republic.

⁷ Parts 2, 3 of article 20 of the Constitution of the Kyrgyz Republic.

15. Thus, the current legislation of Kyrgyzstan already includes the provision of statistics on their activities, including information about their financial situation, the availability of property, expenses, the number and composition of employees, their salaries, etc. for tax authorities, social funds provided by non-commercial organizations.

Public authorities have ample opportunity to monitor compliance with the requirements of laws and other binding acts by non-commercial organizations. At the same time, institutions of the public authorities can adopt appropriate measures to detect violations by representatives of the non-profit sector.

The regulations of the draft law requiring the additional commitments on NGOs duplicate the current legal regulations, at which point there is a lack of objective necessity and expediency of their implementation.

16. The draft law requires that NGOs will have to **provide information about their activities** to the authorized body in the field of official statistics and tax authorities, founders and other persons **under the legislation** of the Kyrgyz Republic and the founding documents of a non-commercial organization.

Thus, it is proposed that the size and structure of income of non-commercial organizations, as well as information about the size and composition of the assets of the non-commercial organization, its expenses, number and structure of employees, their salaries, the use of unpaid work of citizens in the activities of the non-commercial organization, cannot be a subject of trade secrets.

In this case, it should be noted that **it is not clear from the text of the proposed amendments exactly what information will have to provide NGOs to the entities listed above regarding their activities. Therewith, along with the indicated uncertainty, the phrase "under the legislation of the Kyrgyz Republic" enables the Government to establish, for example, in subsidiary regulations, a list of various and detailed information about the activities of NGOs.** This conclusion is also confirmed by the reference that the categories of information listed above cannot be classified as a trade secret.

In addition, the draft law includes that annually until April 1 NGOs that operate at the expense of grant, budget, and other monetary and material resources provided free of charge will submit on the specialized website of the registering authority an information about sources of formation and directions of expenditure of property following the form and procedure determined by the Government.

This regulation of the draft law also allows the Government to determine the widest range of different information to be posted on the specialized site.

The uncertainty and fluidity of the wording of these legal provisions give unreasonably broad discretionary powers to the institutions of the public authorities to determine the list of information about the official activities of NGOs and their employees to be included in periodic reports and to be posted on a specialized website. This situation may, in turn, lead to a disproportionate and, consequently, unconstitutional restriction of fundamental human rights to freedom of association, economic freedom, freedom to use their own abilities, freedom of labor, etc.

Taking into account the above mentioned, the regulations of the draft law do not meet the above-mentioned requirements of international human rights standards, which are also

guaranteed by the Constitution of the Kyrgyz Republic, as to the permissible, i.e. lawful and proportionate restrictions on the rights and freedoms of citizens.

17. That said, according to parts 1 and 2 of article 1 of the law “On commercial secret”, commercial secret means information that is not a state secret related to the production, technology, management, financial and other activities of an economic agent, the disclosure of which might harm the interests of the enterprise.

Information constituting a commercial secret is the property of the business entity or is in its possession, use, or disposal within the limits established by it under the law.

Thus, the concept of commercial secrets cannot be applied to non-commercial organizations.

In this regard, and, given that the relevant state authorities under the existing legislation already have information provided by the NGOs in the various reports, subparagraph 4 of paragraph 2 of article 1 of the draft law contains a list of information that can not be a subject of commercial secrets, it is, therefore, necessary to remove due to the direct contradiction of the current legal framework of the Republic.

18. However, it should be noted that according to article 1 of the law “On non-commercial organizations”, **this Law extends to non-commercial organizations formed as public associations, foundations, and institutions.** This Law does not extend to political parties, trade unions, religious organizations and cooperatives whose status, the procedure for creation and principles of activity are regulated by individual laws of the Kyrgyz Republic.

According to the Ministry of justice, as of April 9, 2019, 32,316 non-commercial organizations were registered in the Kyrgyz Republic. Of these, as public associations – 9120, foundations-6087, institutions-10,485. Thus, the regulations of the draft law under consideration will extend to 25,692 entities of the non-profit sector⁸.

However, it is unclear on what grounds the initiator proposes to increase the reporting requirements only for these three forms of non-profit organizations, and on what basis were selected these forms. Valid questions arise - why the initiator did not include, for example, political parties, religious organizations, trade unions, etc.

In this regard, it should be noted that the draft law contains regulations that allow for obvious discrimination against certain organizational and legal forms of non-commercial organizations. Therefore, we note that any kind of discrimination is prohibited under the international human rights standards and the Constitution of the Republic.

Inconsistency with the requirements of the rule-making method.

19. Following paragraph 1 of article 20 of the law of the Kyrgyz Republic “On laws and regulations of the Kyrgyz Republic” draft laws and regulations on ensuring constitutional rights, freedoms and duties of citizens; **legal status of public associations**, mass media; state budget and tax system; environmental security; combating crime; the introduction of new types of state regulation of business activities should be subject to legal, human rights, gender, environmental, anti-corruption and other scientific expertise (depending on the legal relationship that the draft laws and regulations intended to regulate).

⁸ Letter of the Ministry of justice No.C-2575 dated April 18, 2019.

Paragraph 3 of article 22 of the Law established within the public discussion, the subject of normative activity is obliged to publish information relevant to the subject of discussion, including:

- Justification for the adoption of laws and regulations;
- The list of individuals and entities that participated in the development, as well as with whom the draft laws and regulations were previously agreed;
- Financial and economic estimates, conclusions of the conducted expertise;
- Statistical data;
- Information on monitoring and evaluating legislation in the area of social relations that will be regulated by the draft laws and regulations;
- A projection of the probable social, economic, legal and other consequences of the prepared laws and regulations.

Moreover, article 25 of the above-mentioned Law established that the background statement of the draft laws and regulations must contain, among other things, an analysis of the legal framework existing at the time of development of the draft laws and regulations.

However, in violation of the above-mentioned legal requirements for developing regulations, a specific justification as to the necessity of adopting the draft law wasn't indicated by the initiator, also there have not been released conclusions of legal, human rights, gender, environmental, anti-corruption and other scientific expertise, analysis of the current regulatory framework, as well as information on monitoring and evaluation of legislation regulating the sphere of social relations.

Thus, it is not clear what goals are planned to be achieved by the initiated draft law.

20. Notably, the background statement to the draft law under consideration observes *that the adoption of the draft law will not lead to social, gender, environmental, corruption, human rights, economic, legal consequences.* In that context, we highlight the fact that the draft law was not accompanied by the conclusions of the above-mentioned expertise, based on which the initiator could make the indicated conclusions regarding the lack of negative consequences. For this reason, it is unclear how the initiator came to these conclusions.

21. The background statement to the draft law also indicates that the adoption of this draft law will strengthen the Population Confidence Index in non-commercial organizations and increase the transparency of their activities.

However, the background statement does not provide information regarding which Confidence Index is being discussed here, which, in turn, generates a lot of other questions, such as who approved it, who is exactly responsible for the reliability of this Index, what methodology is used for its calculations, etc.

22. According to the background statement to the draft law, *its adoption will not require additional funding from the national budget.*

However, from the content of the draft law, it follows that four state bodies, namely the authorized bodies responsible for tax, social payments, statistics, and registration of legal entities will be assigned additional duties on collecting, processing and posting various reports from more than 25,000 non-profit sector entities on a specialized website. A significant volume of information will inevitably lead to a large rising pressure on public servants that may result in a

need for increasing the number of state bodies and, consequently, expenditures from the state budget.

At the same time, these regulations of the draft law directly address the regulation of the functions of various authorities.

In this regard, we draw attention to the requirements of paragraphs 3 and 4 of article 31 of the constitutional Law “On Government of the Kyrgyz Republic” according to which the Government participates in legislative activities, inter alia by giving an official conclusion on the draft laws requiring increased costs financed by the state budget or reducing its income and changing competences and powers of the Government, executive bodies.

Such draft laws initiated by deputies of the Jogorku Kenesh or by popular initiative should be submitted to the Government for giving an official conclusion as a regulation of the Government. At the same time, draft laws requiring increased costs covered by the state budget can be adopted by the Jogorku Kenesh after the Government determines the source of funding.

23. Attention should also be given to the requirements of paragraph 3 of article 115 of the Law “On the Rules of Procedure of the Jogorku Kenesh of the Kyrgyz Republic”, according to which the holding of the parliamentary hearings on draft laws on ensuring the constitutional rights, freedoms and duties of citizens, legal status of political parties, NGOs and the mass media, the budget, taxes and other obligatory charges, the introduction of new forms of state regulation of entrepreneurial activity, on the environmental security and combating crime is a mandatory.

Conclusions

Based on the results of the analysis of the regulations of the draft law “On amendments to certain legislative acts of the Kyrgyz Republic”, it can be concluded that this draft law in version posted for public discussion contains a lot of legal norms that bear serious challenges and threats to the democratic values of the rule of law. Individual structural components of the draft law contradict universally accepted principles and norms of international law, as well as constitutional guarantees and the legislative framework of the Kyrgyz Republic. These contradictions are, in particular:

- ✓ non-compliance with the requirements of international human rights standards and constitutional guarantees regarding acceptable, meaning lawful and proportionate restrictions on human rights and freedoms;
- ✓ discrimination by determining only three legal forms of non-commercial organizations, in respect of which it is envisaged to establish additional forms of accountability;
- ✓ duplication of the current legislation in terms of providing various information regarding the NGOs activities in the framework of periodic reporting;
- ✓ gross non-compliance with the legal requirements for drafting laws and regulations.

NGOs in Kyrgyzstan are actively involved in the public life of the country and make a significant contribution to the state's compliance with its international obligations, the Constitution and legislation. Often, it is NGOs as well as the mass media that identify cases of abuse of power and other gross violations of the law by representatives of state bodies, judges, law enforcement officials, etc.

The non-profit sector in Kyrgyzstan is the guardian of constitutionally guaranteed fundamental human rights, such as freedom of speech, religion, access to information about the activities of government agencies, etc. To protect violated rights and restore justice, representatives of NGOs prepare and send appeals to international human rights bodies when the national system fails to comply with universally accepted principles and norms of international law, as well as the legislative framework of Kyrgyzstan.

This, in turn, maybe one of the actual reasons that encourage public authorities to attempt to establish additional, tighter control over the activities of NGOs. The amendments proposed by the draft law carry risks of using reporting tools to exert pressure on the non-profit sector due to its active position in the life of society. Such concerns, along with the non-transparent system of state institutions, including the judiciary, and their high degree of dependence on political conditions, raise serious concerns about the state's actual compliance with fundamental human rights guaranteed by the country's Basic law.

Based on the above, to properly secure the fundamental human rights and freedoms guaranteed by international legal core documents, as well as the Constitution; taking into account the obligation of the Kyrgyz Republic to comply strictly with its commitments under international law, taking into account serious legal conflicts, the lack of an objective need to establish additional mechanisms for monitoring the activities of NGOs, along with the tools available under current legislation, gross non-compliance with the requirements of rule-making method, initiation of the proposed innovations seems inappropriate and contrary to the Constitution and legislation of the Kyrgyz Republic.

The recommendations presented in this analysis have been sent as proposals for public discussion under article 22 of the law “On laws and regulations of the Kyrgyz Republic” and further to handling, we ask you to provide information about their inclusion or non-inclusion to the final draft law, indicating the substantiation of its decision.