



**INFORMATION ON THE APPLICATION
OF ILO CONVENTIONS
Nos. 81, 87, 98, 135, 144, AND 154
BY THE GOVERNMENT OF UZBEKISTAN**



Introduction

This report has been prepared for submission to the **International Labour Organization** to provide an analysis of the Republic of Uzbekistan's implementation of its international obligations in the field of labour rights protection.

Particular attention is paid to compliance with the provisions of **ILO Conventions Nos. 81, 87, 98, 135, 144, and 154**.

The data collected indicate the existence of **systemic violations** in legislation and law enforcement practice that impede the realization of workers' rights to freedom of association, protection from interference by the state and employers, conduct of genuine collective bargaining, and holding tripartite consultations.

I. Violations of ILO Labour Inspection Convention (No. 81)

The State Labour Inspection was established by **Presidential Decision of the Republic of Uzbekistan dated 20 August 2018, No. PP-3913**¹.

On **31 December 2018**, the Cabinet of Ministers approved **Resolution No. 1066**, which establishes the Regulation on the State Labour Inspection under the Ministry of Employment and Labour Relations of the Republic of Uzbekistan².

However, the provisions of the above-mentioned normative legal acts do not comply with the requirements of **Convention No. 81**. In particular, the head of the Inspection and his deputies are appointed to and dismissed from office by the Minister of Employment and Labour Relations of the Republic of Uzbekistan (paragraphs 15 and 16 of the Regulation). No real guarantees are provided to ensure the independence of Inspection personnel from changes of government and of improper external influences, as required by Convention No. 81.

The provisions of the Regulation set limits on the time and frequency of inspections and create conditions for administrative interference in the work of the Inspection during inspections.

In its **Observations, adopted in 2024, published at the 113th ILC session (2025)**, the Committee pointed out the inconsistency of the provisions of the Regulations with the provisions of Convention 81, but no amendments were made to the legislation of Uzbekistan.

Furthermore, **Presidential Decree of the Republic of Uzbekistan dated 15 March 2019, No. UP-5690 “On measures for the fundamental improvement of the system of protection of entrepreneurial activity and optimization of the activities of the prosecution bodies”**³ provides that, as of 1 April 2019, the coordination of inspections of business entities and control over their legality by supervisory bodies shall be exercised by the Commissioner under the President of the Republic of Uzbekistan for the Protection of the Rights and Legitimate Interests of Business Entities. Decisions of the Commissioner in respect of inspections of business entities are binding on supervisory bodies. The Commissioner and his deputy are appointed and dismissed by the President of the Republic of Uzbekistan (**Presidential Decree of 5 May 2017, No. UP-5037**)⁴.

Decree No. UP-5690 establishes numerous restrictions on supervisory activities, making it impossible to conduct inspections of enterprises in accordance with **ILO Convention No. 81**.

Although **Article 538 of the Labour Code** establishes liability for the obstruction of labour inspectors in the performance of their duties, neither the **Criminal Code** nor the **Code of Administrative Liability** establishes sanctions for such violations.

Thus, while Uzbekistan has formally established an Inspection to protect workers’ labour rights and to monitor the safety of working conditions, in reality the Inspection is not an independent body and cannot perform its functions as provided for in ILO Convention No. 81.

¹ <https://www.lex.uz/ru/docs/4213624>

² <https://www.lex.uz/acts/4143050#4155607>

³ <https://lex.uz/ru/docs/4242838>

⁴ <https://lex.uz/docs/3193115>

II. Violations of ILO Freedom of Association and Protection of the Right to Organise Convention (No. 87)

1. Legal Restrictions on the Establishment of Workers' Organizations

Article 2 of ILO Convention No. 87 establishes the right of workers, without distinction whatsoever, to establish and, subject only to the rules of the organization concerned, to join organizations of their own choosing without previous authorisation.

However, Uzbekistan legally restricts this right of workers. The **Law “On Trade Unions”**⁵ (Articles 1, 3, 4, 7) grants the right to organize only to “citizens”. In its previous Observations (adopted 2024, published 113th ILC session, 2025), the Committee requested the State to consider amending the Law “On Trade Unions” in order to avoid any possible ambiguity or conflict of interpretation. Nevertheless, no amendments have been made to the Law to date.

Article 21 of the Law “On Trade Unions” requires the state registration of trade unions, their associations, branches and primary trade union organizations. Such registration is carried out by the Ministry of Justice.

An application for state registration must be accompanied by a list of initiating citizens. For the registration of a trade union, the initiative group must consist of no fewer than 3,000 persons (**paragraph 13(e) of the Regulation on the procedure for state registration of non-governmental non-profit organizations**⁶). Furthermore, **Article 6 of the Law “On Public Associations in the Republic of Uzbekistan”**⁷ provides that republican trade unions (whose activities, according to their statutes, extend throughout the territory of the republic) must have no fewer than 3,000 members.

In its Observations, adopted 2024, published 113th ILC session, 2025, the Committee requested the State to reconsider the minimum membership requirement for trade unions; however, no amendments to the legislation of Uzbekistan have been made.

Thus, the legislation establishes conditions that significantly hinder the realisation by workers of the right to establish organizations, and in practice make the establishment of independent trade unions impossible.

In Uzbekistan, it is difficult to register not only an independent trade union, but also any other non-governmental organization engaged in the protection of labor rights. An example of this is the non-governmental organization **Akbaskur**. Despite repeated attempts to obtain state registration, which began in December 2019, Akbaskur (originally named Chiroq) has faced bureaucratic hurdles, contradictory administrative requirements, and direct pressure from local authorities and law enforcement agencies.

After the founding meeting in February 2025, the leader of the Akbaskur initiative group, **Azimbay Ataniyazov**, began collecting the necessary documents and applied to the local “mahalla committees” (citizen self-government bodies that formally have the status of NGOs,

⁵ <https://lex.uz/docs/4631283>

⁶ <https://www.lex.uz/acts/2356874>

⁷ <https://www.lex.uz/acts/111827>

but in reality, are organs subordinate to local authorities) where the founders lived to confirm their place of residence, as it is required in **Cabinet of Ministers Resolution No. 57**⁸.

However, several chairmen of the mahalla committee in Turtkul district refused to formally confirm information about their residents, because **Cabinet of Ministers Resolution No. 789 (dated October 3, 2018)** allegedly prohibits mahallas from issuing documents confirming residence.

This legal inconsistency has led to a deadlock, blocking the collection of founding documents for the registration of Akbaskur⁹.

2. Practical Restrictions on the Establishment of Workers' Organizations

The State creates numerous obstacles to the registration of workers' organizations not only through legislation but also in practice.

In fact, in Uzbekistan it is impossible to establish an independent trade union outside the framework of the **Federation of Trade Unions of Uzbekistan (FTUU)**, which is under state control. The only independent trade union, **Xalq Birligi**, was established in 2021, but its creation was accompanied by pressure on its members from the State¹⁰.

From 2021 to August 2025, no other independent trade unions have been registered.

Akbaskur members have also been subjected to intimidation and psychological pressure from the authorities. In March 2025, one of the founders withdrew from the initiative citing threats against his family.

Thus, both the substance of Uzbekistan's legislation and its manner of implementation fundamentally undermine the guarantees of Convention No. 87.

3. State Interference in Trade Union Activities

In violation of **Article 3 of ILO Convention No. 87**, the State interferes in the activities of trade unions and prevents workers from freely choosing their representatives and organizing their own structures.

According to **Article 20 of the Law "On Public Associations"**, the Ministry of Justice and its agencies have the right to demand from the governing body of a public association an accounting of the decisions taken, to send its representatives to participate in the activities carried out by the public association, and to receive explanations from members of the public association and other citizens concerning compliance with the public association's charter.

⁸ <https://lex.uz/docs/2356874>

⁹ <https://www.uzbekforum.org/obstacles-to-registration-of-human-rights-ngo-akbaskur-in-karakalpakstan/>

¹⁰ <https://rus.ozodlik.org/a/31169988.html>

According to news on the official website of the **Federation of Trade Unions of Uzbekistan**, representatives of state bodies or employers often attend reporting and election conferences of trade unions¹¹, which raises concerns about the independence of trade unions activities.

In Uzbekistan, trade union chairpersons are not elected by union members but are instead appointed by state representatives or individuals close to them.

For example, in early 2024, the former director of **Navoi International Airport**, in violation of trade union legislation and ILO conventions, appointed **Elbek Rakhimov** as the chair of the trade union. About six months later, the new director removed Rakhimov from this position¹².

Thus, the trade union chairperson was, on the one hand, unlawfully appointed, and on the other hand, unlawfully dismissed. Such practices are widespread among Uzbek officials: once new management takes office, it dismisses all employees appointed by its predecessor, including trade union leaders.

Certain key figures in the trade union system simultaneously hold positions as state officials, further confirming the close ties between unions and the government. For instance, the current chair of the **Federation of Trade Unions of Uzbekistan**, **Qudratilla Rafikov**, was appointed a member of the Senate of the Oliy Majlis (the upper chamber of Parliament) of the Republic of Uzbekistan by **Presidential Decree on 16 November 2024**¹³.

On **11 July 2025**, during the regular reporting and election conference of the **Tashkent City Council of the Federation of Trade Unions of Uzbekistan**, **Sayfullo Akhmedov** was re-elected as chair¹⁴. At the same time, he also serves as a deputy of the Tashkent City Council of People's Deputies¹⁵.

Elections in Uzbekistan lack genuine competition. Both the legislature and the judiciary effectively serve as instruments of the executive branch. As a result, opposition parties are frequently denied registration to operate legally, and unregistered opposition groups function primarily in exile. Currently, only five political parties are registered in the country, all of which are government-aligned¹⁶.

Under such conditions, it is impossible to speak of deputies being independent from the executive authorities. Accordingly, the combination of holding high-level state positions with leadership roles in trade unions demonstrates the political and organizational dependence of unions on the state, preventing them from fulfilling their primary function – the protection of workers' rights.

¹¹ <https://kasaba.uz/ru/2025/07/11/progolosovali-za-dostoyrnogo-kandidata/>,
<https://kasaba.uz/ru/2025/03/26/samarkand-avtomobil-zavodi-mchzh-q-k-kasaba-uyushmasining-hisobot-saylov-konferentsiyasi-bolib-otdi/>

¹² <https://t.me/eltuz2022/31228>

¹³ <https://president.uz/ru/lists/view/7710>

¹⁴ <https://kasaba.uz/ru/2025/07/11/progolosovali-za-dostoyrnogo-kandidata/>

¹⁵ <https://tashkent.uz/ru/society>

¹⁶ <https://freedomhouse.org/country/uzbekistan/election-watch/2024>

In the past, numerous senior government officials would assume positions within the trade union for a certain period following their departure from public office¹⁷.

There have been cases where appointments to trade union positions were in fact used as a way to reintegrate discredited former officials back into the political system.

For example, the hokim (head of government administrative body) of Andijan district, **Abdujabbor Egamberdiyev**, was dismissed in 2022 for “disrespect toward citizens and violation of public servant ethics,” and in 2023 he was convicted on charges of abuse of power and causing significant damage to the state. In December 2024, however, Abdujabbor Egamberdiyev was elected (in reality, appointed) as the chair of the **Andijan Regional Council of the Federation of Trade Unions of Uzbekistan**¹⁸.

From 2018 to 2022 **Zaynilobiddin Nizomidinov** was serving as the Head of the Presidential Administration. Sources suggest Nizomidinov was a key figure behind the constitutional amendments that triggered the unrest in **Karakalpakstan in July 2022**. Days after the unrest, which reportedly claimed 21 lives, he was dismissed from his post¹⁹. On the same day, he was unanimously elected (in reality, appointed) **First Deputy Chairman of the Federation of Trade Unions of Uzbekistan**²⁰.

The abovementioned examples prove the lack of boundaries between the state and trade unions, turning unions into extensions of government power instead of independent defenders of workers' rights.

¹⁷ <https://labourmission.org/ru/news/uteshitelnaya-dolzhnost-otstranennye-ot-vlasti-i-nashedshie-priyut-v-profsoyuze/>

¹⁸ <https://labourmission.org/ru/news/uzbekistan-v-andizhane-eks-khokim-vyshedshiy-iz-tyurmy-vozglavil-profsoyuz/?f=sANwmylp>

¹⁹ <https://rus.ozodlik.org/a/eks-glava-administratsii-mirziyoeva-lishivshiysya-posta-posle-protestov-v-karakalpakstane-poluchil-novuyu-dolzhnostj/33377131.html>

²⁰ <https://kasaba.uz/ru/2022/07/08/uzbekiston-kasaba-uyushmalari-federatsiyasi-bosh-kengashi-mazhlisi-bulib-utdi/>

III. Violations of ILO Right to Organise and Collective Bargaining Convention (No. 98), ILO Workers' Representatives Convention (No. 135), Tripartite Consultation (International Labour Standards) Convention (No. 144), Collective Bargaining Convention (No. 154)

In Uzbekistan, interference in trade union activities is carried out not only by the state, but also directly by employers. Trade union organizations are often dependent on the administration of enterprises and institutions, which is reflected in the appointment of trade union leaders instead of democratic elections²¹.

Workers who demand that their rights be respected are subjected to pressure from the appointed chairpersons²². This practice is common not only in private companies, but also in government agencies. For example, it is reported about the deputy head of the internal affairs department, who had appointed his deputy as the head of the trade union organization and disposes of trade union funds at his discretion²³.

Workers not only face obstacles when attempting to register an independent trade union, but also, in practice, face the impossibility of refusing membership in the official union.

Upon employment, workers are automatically enrolled in the union, and they have no option to decline membership. After joining a trade union, workers generally do not attempt to withdraw due to fear of possible reprisals.

At the same time, official trade unions in Uzbekistan fail to effectively fulfill their responsibilities in protecting workers' rights. Numerous anonymous complaints online highlight the "automatic" deduction of **1% of monthly wages for union fees**. Workers across different sectors report the lack of meaningful support from unions in cases of labor disputes or violations by employers. Many state that unions are of no benefit²⁴ and fail to protect workers' rights²⁵.

The absence of union assistance is evident in many sectors, including **transport, road and capital construction industry**²⁶, **the fuel and energy complex**²⁷, **education**²⁸, and even **within state institutions**²⁹. Workers paying membership fees receive neither material assistance nor any tangible benefits as union members³⁰.

Complaints from workers are usually not addressed on their merits. Responses are formalistic, without concrete measures taken to protect the rights and interests of members of trade unions³¹. There is evidence that trade unions themselves sometimes contribute to violations of workers' rights, for example, when union chairpersons sign internal labour regulations

²¹ <https://t.me/eltuz2022/31502>

²² <https://t.me/eltuz2022/28459>

²³ <https://t.me/eltuz2022/29443>

²⁴ <https://t.me/eltuz2022/35295>

²⁵ <https://t.me/eltuz2022/31938>

²⁶ <https://t.me/eltuz2022/30500>

²⁷ <https://t.me/eltuz2022/27566>

²⁸ <https://t.me/eltuz2022/26863>

²⁹ <https://t.me/eltuz2022/30495>

³⁰ <https://t.me/eltuz2022/30583>

³¹ <https://t.me/eltuz2022/35470>

contradicting labour legislation³² or give consent to the dismissal of workers who were forced by the employer to submit resignation letters³³.

Thus, in Uzbekistan trade unions are turned into extensions of employers, and do not act as independent defenders of workers' interests.

1. Collective Bargaining and Tripartite Consultations

The **Labour Code of Uzbekistan** establishes the principle of social partnership in the field of labour (**Article 6**)³⁴, defined as cooperation between workers and their representatives, employers and their representatives, and state authorities aimed at reconciling the interests of workers, employers, and the state in regulating social and labour relations.

This principle also guarantees the right of workers' and employers' representatives to engage in collective bargaining and to conclude collective agreements and collective contracts.

In practice, the right to voluntary negotiation between employers or employers' organizations and workers' organizations cannot be effectively exercised. The structural dependence of trade unions on both state authorities and employers prevents genuine bargaining on an equal footing.

The legislation and practice in Uzbekistan do not ensure the existence of independent workers' organizations capable of conducting free and voluntary collective bargaining with employers, thereby undermining the guarantees provided under **Article 4 of Convention No. 98**.

The above-mentioned reasons also render the implementation of the provisions of **Convention No. 154** impossible in practice.

2. Workers' Representatives and Tripartite Mechanisms

The restrictions on freedom of association, the appointment of trade union leaders by employers, the automatic inclusion of workers in official trade unions without the possibility of refusal, and the lack of independence of trade unions from employers create a situation in which genuinely independent workers' representatives do not exist in Uzbekistan.

Individuals who attempt to form independent trade unions or other organizations face harassment, intimidation, and other forms of pressure.

This creates a strong cooling effect, deterring workers from seeking representative roles or engaging in trade union activity, and renders the rights guaranteed by **Convention No. 135** entirely ineffective in practice.

³² <https://t.me/eltuz2022/30298>

³³ <https://t.me/eltuz2022/31654>

³⁴ <https://www.lex.uz/ru/docs/6257291?ONDATE=14.02.2025#6258529>

The same structural and practical barriers that undermine the rights protected under **Conventions Nos. 87, 98, and 135** also result in the absence of “representative organizations” within the meaning of **Convention No. 144**.

This Convention requires the existence of representative organizations enjoying the right of freedom of association, which does not exist in practice in Uzbekistan.

As a result, any tripartite mechanisms function in a formal and non-substantive manner, with “worker” participation being carried out by bodies aligned with the state rather than by autonomous organizations.