



The right to strike in the public sector

Kyrgyzstan



The right to strike in the public sector – Kyrgyzstan

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Arina Grazhenskaya: March 2021

Edited by Markhaba Khalmurzaeva

1. Legal basis

International level

The Kyrgyz Republic has ratified:

UN instruments¹

- **International Covenant on Economic Social and Cultural Rights** (ICESCR, Article 8), 1994
- **International Covenant on Civil and Political Rights** (ICCPR, Article 22), 1994

ILO instruments²

- **Convention No.87 concerning Freedom of Association and Protection of the Right to Organise** (ratified on 31 March 1992);
- **Convention No. 98 concerning the Right to Organise and to Bargain Collectively** (ratified on 31 March 1992)
- **Convention No. 154 concerning Collective Bargaining** (ratified on 22 December 2003)

Kyrgyzstan has not ratified Convention No. 151 concerning Labour Relations (Public Service)

Regional level

Commonwealth of Independent States Convention on Human Rights and Fundamental Freedoms (Ratified on 1 August 2003)³

If the rules specified in international treaties ratified by Kyrgyzstan are more to the worker's advantage than those established by domestic laws, other legislative instruments, collective bargaining and other agreements, the rules of the international treaties take precedence, as stated in article 3 of the Labour Code.⁴

National level

Constitution⁵ - Article 43, Chapter II "Human rights and freedoms" states that: "Everyone shall have the right to strike".

- The Constitutional Law "On Martial Law"⁶ imposes restrictions on strikes (Article 5) and the Constitutional Law "On the State of Emergency"⁷ establishes liability for organising a strike in a state of emergency (Article 30).
- **Applicable laws**
 - **The Labour Code** (2004)⁸ defines the procedure and conditions for strikes. Chapter 43 "Collective Labour Disputes" contains the definition of "strike" (Article 428), guarantees the right to strike (Article 436) and stresses that

participation in a strike is voluntary, as well as the prohibition of forcing employees to take part in or refusal to participate in a strike. Similarly, the Labour Code contains provisions governing in detail a wide range of issues related to the procedural requirements, the obligations of the collective labour dispute' sides during a strike (Article 439), guarantees and the legal condition of workers (Article 441); defines illegal strikes (Article 440) and determines the responsibility of employees (Article 444) for participation in them.

- **The Law on Trade Unions** (1998)⁹ provides for the right of trade unions to organise and conduct meetings, rallies, demonstrations, processions, strikes and other collective actions for defending the interests of the trade union members in accordance with Kyrgyz law and trade union statutes. (Art.19)
- **Specific laws and regulations for certain sectors:** The right to strike is restricted by certain national laws: the Labour Code; Law № 1362-XII on National Security Agencies (1994)¹⁰; Constitutional Law No. 141 (2008) on the Status of Judges of the Kyrgyz Republic¹¹; Regulations on the Basics of ethics for civil servants of the Kyrgyz Republic (approved by Presidential Decree No. 11 (2001))¹² etc (see Section 4 of this paper below).

2. Who has the right to call a strike?

The decision to call a strike may be taken by:

- **The meeting (conference) of employees** of an organisation (branch, representative office or another detached structural unit) on the proposal of a representative body of employees which has been empowered by the employees to resolve a collective labour dispute.
- **A trade union (association of trade unions)**. The decision to announce a strike adopted by a trade union should be approved by a meeting of employees for every organization.

A meeting (conference) of employees is considered competent in cases when at least two thirds of employees (conference delegates) are present. The decision is adopted when it is voted for by not less than one half of employees present at the meeting.

If it is impossible to hold a meeting of employees, a representative body of employees has the right to approve its own decision by collecting signatures in favour of taking strike action, of more than one half of employees.

The employer has no rights to create obstacles to conduct the meeting (conference).¹³

3. Definition of strike

The Labour Code defines a strike as *a temporary voluntary refusal of workers to perform job duties (fully or in part) with a goal to resolve a collective labour dispute*¹⁴.

Warning strikes are also permitted. Under Article 437 of the Labour Code. A warning strike may be called after five calendar days of deliberations of the conciliation commission. It may last for one hour and may be organised once during a collective labour dispute. The employer shall be informed about the warning strike in writing no later than three days in advance. The minimum works (services) need to be ensured in case of a warning strike in accordance with the rules applicable to 'normal' strikes provided by the Labour Code (see Section 4 below).

The Labour Code expressly provides for the above-mentioned types of strike. There are no explicit provisions in Kyrgyz legislation on other types of collective action such as solidarity strikes, political strikes, sit-ins, go-slow actions, rotating strikes, work-to-rule, picketing, blockades, etc.

Unlike the Labour Code, which states that a strike could be organised *with a view to settle a collective labour dispute* the Law on Trade Unions provides for the right of trade unions to organise strikes and other collective actions *for defending the interests of the trade union members* in accordance with Kyrgyz law and trade union statutes. (Art.19)

4. Who may participate in a strike?

As mentioned above, Article 43 of the Constitution guarantees employees the right to strike and states that: “Everyone shall have the right to strike”. But this constitutional right to strike is not absolute, and rather depends on the mechanism of its incorporation into national legislation.

Article 20 of the Constitution provides that: “[...] The rights and freedoms of man and citizen may be limited by the Constitution and by laws only for ensuring national security, public order, protection of the health, morality, the rights, and freedoms of other people. Such restrictions may also be imposed taking into account the particularities of military or other public service. Restrictions imposed must be proportionate to the stated objectives.”

Under the Labour Code, participation in a strike is voluntary. People forcing employees to take part in or to refuse of taking part in strike action bear disciplinary, administrative, criminal responsibility according to the Labour Code or other laws.¹⁵

Since the legislation recognises the right to strike only in the event of a collective labour dispute between employees and the employer, according to the Article 436 of the Labour Code, representatives of the employer have no right to arrange strike action or take part in it. This provision serves as a safeguard against so-called “directors' strikes”, which are often used as an instrument of pressure on the state to provide financial assistance to the enterprise, help solve the social problems of workers, etc.¹⁶

Restrictions on the right to strike

Article 440 of the Labour Code provides for limitation of participation in strikes, as follows:

- (1) The strike is prohibited when martial law, a state of emergency or special measures have been imposed under emergency legislation.

- (2) The employees working in the following organisations cannot participate in strike action:
 - Armed forces
 - Other military and paramilitary formations and units entrusted with maintaining the country's defence capability and state security
 - Organisations conducting emergency, relief, search, rescue, firefighting
 - Organisations dealing with natural disasters and providing emergency and response operations;
 - Law enforcement agencies
 - Organisations directly involved in the operation of highly hazardous facilities or equipment
 - Ambulance stations and emergency medical help

Employees working at organisations rendering vital public services, cannot participate in the strike action if it would endanger the defence and security of the state, human lives and health. This limitation applies to institutions in the following areas.:

- power services
- heating services
- water services

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- gas services
- air, railway and navy transport
- communications
- hospitals

Obligation to perform minimum works (services)

Article 439 (Duties of each side of the collective labour dispute) of the Labour Code provides the obligation to perform minimum works (services) during a strike.

A list of the minimum required work (services) in an organisation (branches, representative offices), the activities of which are associated with the safety of persons, health support, and the vital interests of society, shall be elaborated for each branch (sub-branch) of the economy and approved by the executive agency responsible for coordinating and regulating activities in the corresponding branch (sub-branch) of the economy, in coordination with all corresponding trade unions. Procedures for elaborating and approving the list of minimum necessary work (services) shall be defined by the Government of the Kyrgyz Republic.¹⁷

The minimum required work (services) performed in an organisation (branches, representative offices) shall be determined by agreement between the sides of a collective labour dispute together with the local self-governing bodies on the basis of lists of minimum necessary work (service) within five days from the day a decision is adopted to declare a strike. The inclusion of a certain type of work (services) into the list of minimum work (services) should be motivated by the likelihood of harm to health or a threat to citizens' lives. The minimum necessary work (services) may not include work (services) not envisaged in the corresponding lists of minimum necessary work (services).¹⁸

While staging a warning strike the body leading it shall ensure the minimum of works (services).¹⁹

The decision of the respective authority establishing the minimum required work (services) may be appealed in court by the parties to the collective labour dispute. Under the Labour Code, a strike may be declared illegal if the minimum required services are not provided.²⁰

According to the Labour Code, in the event of a direct threat to the life and health of people, the court has the right to postpone an imminent strike for up to 30 days, and to suspend a strike that has begun for the same period.²¹

5. Procedural requirements

Employees or their representatives have the right to start to arrange a strike if the conciliatory proceedings have not lead to the resolution of the collective labour dispute, or the employer or its representative decline to take part in the conciliatory proceedings or fail to observe an agreement reached in the course of settlement of the collective labour dispute.²²

Balloting rules

The decision to call a strike is taken by the meeting or a conference of the employees on the proposal of representative body of employees which has been empowered by the employees to resolve a collective labour dispute. The meeting (conference) quorum is no less than two thirds of employees (conference delegates).²³

The decision to call a strike shall be deemed adopted if at least half of the employees or delegates present at the meeting or conference have voted for it. However, if a meeting (conference) of the employees cannot be held, the representative body of the employees is entitled to confirm a decision to call a strike by collecting the signatures of more than half of the employees in support of a strike.²⁴

Notification

A strike must be notified to the employer in writing at least 10 calendar days in advance. A one-hour warning strike may be declared, with a notice in writing given to the employer at least three working days in advance.²⁵

Strike declaration

The decision declaring the strike shall contain the following:

- a list of the disagreements of the parties to the collective labour dispute that are deemed grounds for the declaration and conduct of the strike;
- the date and time of the beginning of the strike and it's supposed duration;
- an anticipated number of participants;
- the name of the body that leads the strike and the representatives of employees authorised to participate in conciliatory proceedings; and
- proposals for the minimum works (services) to be provided during the strike.²⁶

During the strike, the employer, executive agencies, local self-governing bodies and the body leading the strike shall be required to take all measures in their power during the strike to ensure public order and the integrity of the property of the organisation (branch, representation office, other exclusive structural subdivision) and the workers, as well as the functioning of any machines and equipment, stoppage of which would present an imminent threat to the life and health of human beings.²⁷

Body leading the strike

A strike is led by a representative body of employees which has a right to hold a meeting of employees, to get obtain from the employer all information concerning the employees' interests and to invite experts to prepare conclusions about the questions under discussion.²⁸

The representative body of employees has the right to suspend a strike. A strike can be renewed without considering the collective labour dispute in the conciliation commission for

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a second time. The employer shall be warned about renewal of a strike not later than three days in advance.²⁹

During the strike, the sides of the collective labour dispute shall continue to try to settle the dispute by conducting conciliation procedures.³⁰

6. Legal consequences of participating in strikes

Participation in a lawful strike

- According to the Labour Code, participation in a strike may not be considered a violation of labour discipline or be a ground for cancelling a labour contract, with the exception of the case of failure to fulfil the obligation to stop a strike that has been already declared unlawful by the court.³¹
- It shall be prohibited to apply disciplinary measures against **workers who participate in a strike**, with the exception of the cases stipulated in Article 440 (4) of the Labour Code mentioned above.³²
- Workers participating in a strike shall retain their job position and office during a strike period.³³
- The employer has the right not to pay workers' wages during the time they are participating in a strike, with the exception of workers engaged in fulfilling the mandatory minimum of work (services).³⁴
- A collective agreement or other agreement(s) reached in the course of resolving a collective labour dispute may provide for compensatory payments to workers participating in a strike.³⁵
- The employees **who do not participate in a strike** but are prevented from performing their jobs because of a strike and who announce their being idle in writing may have their salary paid according to the rules provided by the Labour Code. The employer has the right to transfer the employees who do not participate in the strike to another job.³⁶
- A collective agreement or other agreement(s) reached in the course of resolving a collective labour dispute may provide for a more preferential system of payments to workers participating in strikes than that provided in the Labour Code.³⁷
- *Lockout*. Article 442 of the Labour Code refers to the "*prohibition of lockout*". It was noted that however, 'lockouts' prohibited by this provision are defined only as dismissal of the employees because of their participation in the collective labour dispute (including the strikes). While the ILO defines a lockout as "the total or partial temporary closure of one or more places of employment, or the hindering of the normal work activities of employees, by one or more employers to enforce or resist demands or express grievances, or support other employers in their demands or grievances"³⁸ So, according to the Labour Code, employers are not prohibited from excluding workers from their working places, i.e., to effectively organise a lockout.

Participation in unlawful strikes

- The decision to declare a strike unlawful shall be taken by the court upon a request filed by the employer or prosecutor.³⁹
- A court decision is communicated to employees through the body leading the strike, which is obliged to immediately inform the participants in the strike of the court's decision.⁴⁰

- A court decision declaring a strike unlawful shall be subject to immediate execution. Workers must stop the strike and resume work no later than the next day after a copy of the court decision is served on the body leading the strike.⁴¹
- According to the Labour Code, workers who proceed to hold a strike or fail to stop a strike on the working day after the body leading the strike is informed of a legally enforceable court decision declaring a strike unlawful or postponing or suspending a strike, may be subject to disciplinary sanctions for violating labour discipline,⁴² i.e. dismissed on the basis of absenteeism⁴³.

It was noted that the participation in a strike that has been declared illegal by the court, is not itself a ground for disciplinary measures, only the refusal to return to work one day after the court decision declaring the strike unlawful comes into force. It was commented⁴⁴ that employers tend to treat the workers' collective actions as not falling under definition of strike. In such situations, workers are dismissed not for participating in an illegal strike but for the breach of their working duties.

- The workers' representative body that has announced a strike can be held liable for damages caused to the employer by the unlawful strike, if it did not stop the strike after the court's decision declaring the strike unlawful has come into force. The amount of compensation will be determined by the court.⁴⁵

7. Case law of international/European bodies

International Labour Organisation

- Case No 3386 (Kyrgyzstan) - Complaint date: 29-JUN-20

The Case was mentioned in the Report No 392, October 2020 (as confidential)

Over the past two years, trade unions in Kyrgyzstan have been fighting against the adoption of a draft law on trade unions that deprives workers of the freedom of association, significantly restricts union activities, dictates the internal structure of unions and puts unions under state control. There have been multiple protests against the draft law but the authorities responded by prosecuting union leaders, constant interrogations, provocations, and pressure. A few union leaders were also removed from their posts.⁴⁶

In June 2020, the Mining and Metallurgy Workers' Union of Kyrgyzstan (MMTUK) complained to the ILO Committee on Freedom of Association. The international trade union movement (ITUC, global federations, and many trade unions and labour activists all over the world) have shown their support for unions in Kyrgyzstan and together with the UN and the ILO have expressed their objections to the draft law as being in contravention of the national constitution and ILO Conventions 87 and 98, ratified by Kyrgyzstan.

However, on 31 March 2021 the law was approved by Kyrgyzstan's parliament in the third reading. Trade unions are calling on the President of the Kyrgyz Republic to veto the law on trade unions and urge that Kyrgyzstan seek ILO technical expert advice and support in developing trade union legislation ensuring full compliance with international core labour standards and norms.

The IndustriALL global union federation of which MMTUK is a member, is calling on the European Commission to intervene as compliance with ILO Conventions 87 and 98 are part of Kyrgyzstan's trade agreement commitments and overall obligations to the ILO. Currently the Kyrgyz economy is benefiting from the trade preferences unilaterally offered by the European Union to Kyrgyzstan through the Generalised System of Preferences Plus, in return for the implementation by Kyrgyzstan of 27 international conventions related to, inter alia, human and labour rights.⁴⁷

8. Recent developments

According to the Bureau for Eastern Europe and Central Asia and the Decent Work Technical Support Team of the International Labour Organisation (*Assessment of the scope of labour law reform in Kyrgyzstan*, April 2019), the number of collective labour disputes and strikes in Kyrgyzstan is very low (fewer than 10 protests were recorded in 2016). This includes all types of strikes – both legal and illegal. Analysts attribute this low level of struggle for labour rights to several factors, including the complexity of the procedures that are defined in the law.⁴⁸

The 2019 *UN Common Country Analysis Update* for the Kyrgyz Republic points to the weakness of national, sectoral and enterprise-level social dialogue between employers and workers' organizations which is not developed enough to ensure decent (safe and fair) working conditions and a gradual increase of living standards. "Collective bargaining at workplaces is not supported and promoted which goes against the corresponding ILO Convention ratified by the Kyrgyz Republic. The resulting weakness of trade unions deprives Kyrgyz workers of official options to resist informal employment and assert their labour rights".⁴⁹

Therefore, there are few examples of strikes as such but over the last few years there have been media reports on the following:

- April 2021 – several lorry drivers announced a strike over the failure to pay wages.⁵⁰
- January 2021 – a strike of urban transport drivers (minibuses) in Bishkek.⁵¹
- January 2020 – medical workers from the Bishkek City Children's Clinical Hospital No 3 – a planned strike in solidarity with doctor who was attacked by a patient and later dismissed.⁵²
- May 2019 – a Facebook message, "Doctors are ready to go on strike!", was posted highlighting failure of healthcare reform, low salaries, massive debts, bullying by bosses and patients, old equipment and untrained staff. The demand was to avoid doctors resigning en masse and going on strike, but to solve the problems peacefully and raise salaries to 25-30 thousand soms per month.⁵³
- June 2018 – lorry drivers supplying coal to the Bishkek energy supply station did not go to work for 20 days in a protest over wages.⁵⁴
- 2008-2014 – teachers have organised several strikes and published demands for increased salaries and improvements in working conditions.

9. Bibliography

- The Constitution of the Kyrgyz Republic was adopted on 27 June 2010, an unofficial English translation available at: https://www.legislationline.org/download/id/3116/file/Kyrgyz%20Constitution%20-%20adopted%20by%20referendum%2027%20Jun2010_f_EN.pdf
- The Labour Code of the Kyrgyz Republic was adopted on 4 August 2004 N106, available in Russian at: <http://cbd.minjust.gov.kg/act/view/ru-ru/1505>
- The Law “On Trade Unions” was adopted on 16 October 1998 N130, available in Russian at: <http://cbd.minjust.gov.kg/act/view/ru-ru/137?cl=ru-ru>
- NORMLEX. Information System on International Labour Standards, available at: <https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:1:0::NO::>
- Н. Аленкина, «Право граждан Кыргызской Республики на забастовку: реальность и проблемы правового регулирования», published on 08.01.2014, available in Russian at: <https://www.sovremennoepravo.ru/m/articles>
- Un Common Country Analysis Update. Kyrgyz Republic. 2019, available at: https://kyrgyzstan.un.org/sites/default/files/2020-06/1%20OON_en_0.pdf
- ITUC. News concerning Kyrgyzstan: <https://www.ituc-csi.org/spip.php?page=recherche&recherche=Kyrgyzstan&ok=>
- Central Asia Labour Rights Monitoring Mission. News concerning Kyrgyzstan: <https://labourcentralasia.org/en/news/?f=kyrgyzstan>
- IndustriALL Global Union. News concerning Kyrgyzstan: <http://www.industrialunion.org/search?query=Kyrgyzstan&language=en>

Notes

- 1 Status of ratification by the Kyrgyz Republic of UN Treaties available at: <https://treaties.un.org/Pages/Treaties.aspx?id=4&subid=A&clang=en>, consulted on 01.02.2021
- 2 Status of ratification by the Kyrgyz Republic of ILO Conventions available at: https://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102884, consulted on 01.02.2021
- 3 Commonwealth of Independent States Convention on Human Rights and Fundamental Freedoms available at: <http://cbd.minjust.gov.kg/act/view/ru-ru/17309>, consulted on 01.02.2021
- 4 Article 3 (3) of the Labour Code
- 5 The Constitution of the Kyrgyz Republic was adopted on 27 June 2010, an unofficial English translation available at: https://www.legislationline.org/download/id/3116/file/Kyrgyz%20Constitution%20-%20adopted%20by%20referendum%2027%20Jun2010_f_EN.pdf, consulted on 01.02.2021
- 6 The Constitutional Law “on Martial Law” was adopted on 30 April 2009 № 149, available in Russian at: <http://cbd.minjust.gov.kg/act/view/ru-ru/202647?cl=ru-ru>, consulted on 01.02.2021
- 7 The Constitutional Law “On the State of Emergency” was adopted on 24 October 1998 № 135, available in Russian at: <http://cbd.minjust.gov.kg/act/view/ru-ru/142?ckwds=%25d0%25b7%25d0%25b0%25d0%25b1%25d0%25b0%25d1%2581%25d1%2582%25d0%25be%25d0%25b2%25d0%25ba%25d0%25b>, consulted on 01.02.2021
- 8 The Labour Code of the Kyrgyz Republic was adopted on 4 August 2004 N106, available in Russian at: <http://cbd.minjust.gov.kg/act/view/ru-ru/1505>, consulted on 01.02.2021
- 9 The Law “On Trade Unions” was adopted on 16 October 1998 N130, available in **Russian at:** <http://cbd.minjust.gov.kg/act/view/ru-ru/137?cl=ru-ru>, consulted on 01.02.2021
- 10 Law “On National Security Agencies of the Kyrgyz Republic” № 1362-XII of 11 January 1994, available in Russian at: <http://cbd.minjust.gov.kg/act/view/ru-ru/710>, consulted on 01.02.2021
- 11 Constitutional Law No. 141 on the Status of Judges of the Kyrgyz Republic was adopted on 9 July 2008, available in Russian at: <http://cbd.minjust.gov.kg/act/view/ru-ru/202352?ckwds=%25d0%25b7%25d0%25b0%25d0%25b1%25d0%25b0%25d1%2581%25d1%2582%25d0%25be%25d0%25b2%25d0%25ba%25d0%25b0>, consulted on 01.02.2021
- 12 Regulations on the Basics of ethics for civil servants of the Kyrgyz Republic (approved by Presidential Decree No. 11 of 9 January 2001), available in Russian at: <http://cbd.minjust.gov.kg/act/view/ru-ru/2360?ckwds=%25d0%25b7%25d0%25b0%25d0%25b1%25d0%25b0%25d1%2581%25d1%2582%25d0%25be%25d0%25b2%25d0%25ba%25d0%25b0>, consulted on 01.02.2021
- 13 Article 437 of the Labour Code
- 14 Article 428 of the Labour Code
- 15 Article 436 of the Labour Code
- 16 Н. Аленкина, «Право граждан Кыргызской Республики на забастовку: реальность и проблемы правового регулирования», published on 08.01.2014, available in Russian at: <https://www.sovremennoepravo.ru/m/articles>
- 17 Article 439 of the Labour Code
- 18 Article 439 of the Labour Code
- 19 Article 437 of the Labour Code
- 20 Article 439 of the Labour Code
- 21 Article 440 of the Labour Code
- 22 Article 436 of the Labour Code
- 23 Article 437 of the Labour Code
- 24 Article 437 of the Labour Code
- 25 Article 437 of the Labour Code

- 26 Article 437 of the Labour Code
- 27 Article 439 of the Labour Code
- 28 Article 438 (1) of the Labour Code
- 29 Article 438 (2) of the Labour Code
- 30 Article 439 of the Labour Code
- 31 Article 441 (1) of the Labour Code
- 32 Article 441 (2) of the Labour Code
- 33 Article 441 (3) of the Labour Code
- 34 Article 441 (4) of the Labour Code
- 35 Article 441 (5) of the Labour Code
- 36 Article 441 (6) of the Labour Code
- 37 Article 441 (7) of the Labour Code
- 38 ILO' definition of the "lockouts" available at: <https://ilostat.ilo.org/topics/work-stoppages/>, consulted on 01.02.2021
- 39 Article 440 (1) of the Labour Code
- 40 Article 440 (1) of the Labour Code
- 41 Article 440 (1) of the Labour Code
- 42 Article 444 (1) of the Labour Code
- 43 Article 146 of the Labour Code
- 44 Н. Аленкина, «Право граждан Кыргызской Республики на забастовку: реальность и проблемы правового регулирования», published on 08.01.2014, available in Russian at: <https://www.sovremennoepravo.ru/m/articles>
- 45 Article 444 (2) of the Labour Code
- 46 Kyrgyzstan: Stop pressure on trade unions, available at: <http://www.industrialunion.org/kyrgyzstan-stop-pressure-on-trade-unions>
- 47 New Kyrgyz trade union law must be revoked, available at: <http://www.industrialunion.org/new-kyrgyz-trade-union-law-must-be-revoked>
- 48 Им бастовать запрещено, available in Russian at: <http://precedentinfo.kg/2020/02/24/im-bastovat-zapreshheno/>
- 49 Un Common Country Analysis Update. Kyrgyz Republic. 2019, p. 31, available at: https://kyrgyzstan.un.org/sites/default/files/2020-06/1%20OON_en_0.pdf
- 50 Кыргызстан: Водители, транспортирующие уголь с Кара-Кече на ТЭЦ Бишкека, объявили забастовку, available at: <https://labourcentralasia.org/ru/news/voditeli-ugol-zabastovka/?f=JeRfI5yz>
- 51 Сколько маршруток утром не выехали на линии в Бишкеке, рассказали в мэрии, available at: <https://ru.sputnik.kg/society/20210118/1051144695/bishkek-marshrutka-zabastovka-ugt.html>
- 52 В поддержку уволенной. Врачи детской больницы грозят не выйти на работу, available at : https://24.kg/obschestvo/140491_vpodderjku_uvolennoy_vrachi_detskoy_bolnitsyi_grozyat_nevyiyti_narabotu/
- 53 Врачи Кыргызстана собираются устроить забастовку, available at: https://www.tuz.kg/news/1070_vrachi_kyrgyzstana_sobirautsia_ystroit_zabastovky.html
- 54 Перевозчики угля для ТЭЦ бастовали 20 дней на трассе. Реакция госорганов, available at: <https://ru.sputnik.kg/society/20180614/1039685066/kyrgyzstan-tehc-voditeli-perevozka-ugol.html><https://ru.sputnik.kg/society/20180614/1039685066/kyrgyzstan-tehc-voditeli-perevozka-ugol.html>