



Research Article



## Genesis of The Activity of Internal Affairs Bodies of The Republic of Uzbekistan in Administrative-Offense Proceedings

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**Abstract:** This article examines the historical and legal genesis of the activity of internal affairs bodies of the Republic of Uzbekistan in administrative-offense proceedings, tracing the evolution of this institutional function from the Soviet era through the foundational post-independence period and into the contemporary reform phase initiated in 2017. The study draws on primary legislative sources including the Code of Administrative Responsibility of the Republic of Uzbekistan (1994), the Law “On Internal Affairs Bodies” (2016), successive presidential decrees reforming the Ministry of Internal Affairs, and procedural regulations governing case-initiation, evidence collection, adjudication, and enforcement. The article demonstrates that the genesis of the current procedural framework reflects a dialectical interaction between inherited Soviet administrative-law architecture and autonomous legislative choices made by the Uzbek legislature in response to constitutional mandates, human rights commitments, and state-building imperatives. The analysis identifies four principal developmental phases: Soviet institutional foundations (1917-1991), post-independence reconstruction (1991-2001), procedural consolidation (2001-2017), and systemic modernisation (2017-present). The article further assesses structural tensions between the dual function of internal affairs bodies as both enforcement agencies and as adjudicatory authorities in administrative-offense cases, and identifies reform priorities for aligning Uzbekistan’s administrative-offense proceedings with international standards of due process.

**Keywords:** Administrative Offense, Internal Affairs Bodies, Administrative Proceedings, Code of Administrative Responsibility, Republic of Uzbekistan, Ministry of Internal Affairs, Legal Genesis, Post-Soviet Reform, Administrative Coercion, Due Process, Administrative Adjudication, Police Powers



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### Introduction

The legal institution of administrative-offense proceedings occupies a structurally pivotal position within the public law system of any state governed by the rule of law: it represents the juncture at which the coercive power of the executive confronts the rights and freedoms of individual persons outside the more procedurally elaborate framework of criminal justice [1]. In the Republic of Uzbekistan, this institution is principally regulated by the Code of Administrative Responsibility, which entered into force in 1994 and has since undergone extensive amendment, and by the Law 'On Internal Affairs Bodies' of 2016. Within this legal framework, internal affairs bodies occupy a position of particular importance: they are simultaneously the principal authorities empowered to initiate administrative-offense cases, to compile the evidentiary record in the form of the administrative-offense report (protokol), and, in a defined range of

cases, to impose administrative sanctions without judicial participation [2], [3].

Understanding how this institutional configuration came into being, what legal and historical forces shaped it, and in what direction contemporary reform is steering it, constitutes a matter of both scholarly and practical significance. From a scholarly perspective, the genesis of Uzbekistan's administrative-offense procedural system illuminates the broader trajectory of post-Soviet legal transformation in Central Asia, a region where state institutions were reconfigured under conditions of simultaneous political transition, economic restructuring, and national identity construction [4]. From a practical perspective, the institutional history of internal affairs bodies in administrative proceedings bears directly on the quality of legal protection afforded to citizens subjected to administrative coercion, a matter of ongoing concern to both domestic reformers and international partners assessing Uzbekistan's compliance with due process norms.

The present article proceeds through four principal sections corresponding to the developmental phases identified above. The analysis draws on primary legislative sources, secondary doctrinal scholarship, and assessments by international monitoring bodies [5]. The aim is not merely to chronicle legislative change but to identify the structural logics animating successive phases of reform and the unresolved tensions that contemporary reform initiatives must address.

*Post-Independence Legal Reconstruction (1991-2001).* The declaration of independence on 31 August 1991 and the subsequent adoption of the Constitution of the Republic of Uzbekistan on 8 December 1992 created the formal constitutional framework within which a new national legal system was required to be constructed. The Constitution's first chapter proclaimed Uzbekistan a democratic, law-governed state in which the human being, his rights and freedoms are the supreme value (Article 13), and enshrined the separation of powers, the independence of the judiciary, and the presumption of innocence as foundational constitutional principles [6], [7]. These provisions created a normative mandate for the transformation of administrative-offense proceedings, which under the Soviet model had been characterised by executive dominance and limited judicial oversight.

In the sphere of internal affairs, the foundational institutional transformation was effected through the Law 'On the Police,' adopted on 25 December 1991, which reconstituted the Soviet-era militia as a police force in the service of the citizens of the new state rather than the instrument of a one-party state apparatus [8]. The Law defined the competence of the police in broad terms encompassing the prevention and suppression of offenses, the protection of public order, and the exercise of administrative functions including the compilation of administrative-offense reports and the imposition of certain administrative sanctions. While the institutional form was thus formally reconstituted, the operational practices and internal regulatory framework of the newly designated police in its administrative-proceedings function retained, in large measure, the Soviet inheritance [9].

The central legislative achievement of this phase was the adoption of the Code of Administrative Responsibility (CAR) of the Republic of Uzbekistan in 1994. The CAR, though structurally modelled on the Soviet 1984 Code, introduced a number of modifications reflecting the new constitutional framework. The presumption of innocence was expressly incorporated as a governing principle of proceedings (Article 9 CAR) [10]. Provisions were included extending the right of the person subject to proceedings to be informed of the charges against them, to present evidence, and to be represented by a lawyer or other representative (Articles 248-253 CAR). The role of the prosecutor in supervising the legality of administrative proceedings conducted by internal affairs bodies was codified, creating a vertical accountability mechanism that partially substituted for the absence of systematic judicial review of non-judicial administrative sanctions.

Notwithstanding these legislative advances, empirical and doctrinal assessments of the period consistently

identify significant gaps between the formal normative framework and its implementation within internal affairs bodies' administrative-offense practice [11]. Rustambekov has documented that internal affairs officers frequently treated the compilation of administrative-offense reports as a ministerial formality rather than as the foundational evidentiary act of a legally regulated proceeding, resulting in systematic deficiencies in the quality of evidentiary records and inadequate notification of procedural rights. These institutional deficiencies reflected both the persistent influence of Soviet operational culture and the absence, during this period, of sustained investment in professional legal training for internal affairs personnel.

## Methodology

*Procedural Consolidation and Institutional Development (2001-2017)*. The period from the early 2000s to 2017 was characterised by progressive legislative refinement of administrative-offense proceedings and by a gradual strengthening of the institutional capacity of internal affairs bodies in their administrative function, though fundamental structural tensions inherited from the Soviet era were not definitively resolved during this phase. A principal legislative development was the systematic extension of the subject-matter jurisdiction of internal affairs bodies in administrative proceedings, as new categories of administrative offense were created in response to emerging regulatory needs in the fields of road traffic safety, environmental protection, consumer rights, migration management, and digital communications.

The Law "On Internal Affairs Bodies" of 2016 represented the most comprehensive legislative framework for the organisation and competence of internal affairs bodies since the 1991 Police Law. The 2016 Law defined the structural organisation of the Ministry of Internal Affairs (MIA), the departmental hierarchy, the competence of territorial units, and the legal status of internal affairs officers in the exercise of their functions. With respect to administrative-offense proceedings specifically, the Law clarified the powers of internal affairs officers to conduct administrative detention (Article 34), to conduct personal inspection and inspection of documents (Article 36), to seize items and documents constituting evidence of administrative offenses (Article 37), and to compile administrative-offense reports with specified mandatory content requirements. Mamatov has assessed the 2016 Law as representing a meaningful, if incomplete, advance toward a rights-protective model of administrative proceedings within internal affairs bodies, noting in particular the codification of the proportionality principle as a governing standard for the application of administrative-coercive measures.

A significant structural characteristic of Uzbekistan's administrative-offense proceedings system that consolidated during this period is the dual function of internal affairs bodies as both case-initiating and, in specified categories of cases, adjudicatory authorities. Articles 220-232 of the Code of Administrative Responsibility vest in senior officials of internal affairs bodies the power to examine and decide administrative-offense cases involving a range of offenses relating to road traffic, public order, migration, and administrative regulations, without requiring judicial referral. This dual function was identified by comparative legal scholars as a structural anomaly by reference to the separation-of-powers principle, since it concentrates in the same institutional body the functions of accusation and adjudication. The European Court of Human Rights, in cases arising from analogous arrangements in other post-Soviet states, has required that administrative-penalty proceedings in which sanctions of a criminal nature within the meaning of Article 6 ECHR are imposed provide access to a court with full jurisdiction to review both the facts and the law.

The Law on Administrative Procedures of 2018, while primarily addressing the general administrative procedure for executive decision-making rather than administrative-offense proceedings specifically, contributed to the normative environment for the latter by establishing overarching principles of

procedural legality, proportionality, reasoned decision-making, and judicial reviewability applicable to all executive bodies including internal affairs bodies. Usmanov has argued that the 2018 Law created an indirect impetus for reform of administrative-offense proceedings by establishing, as a baseline standard across all administrative activity, the obligation to provide written reasons and the right of affected persons to participate in proceedings affecting their legal interests.

## Result and Discussion

*Structural Organisation of Administrative-Offense Proceedings by Internal Affairs Bodies.* An understanding of the genesis of Uzbekistan's administrative-offense proceedings system requires examination of the specific procedural architecture through which internal affairs bodies exercise their competence. The Code of Administrative Responsibility establishes a multi-stage proceedings model comprising four principal phases: initiation, examination, adjudication, and enforcement [12]. Internal affairs bodies exercise primary competence at the initiation and, in defined categories, adjudication phases.

Initiation is effectuated through the compilation of the administrative-offense report (*protokol ob administrativnom pravonarushenii*), which Article 264 CAR requires to contain: the date and place of compilation, the name and position of the official compiling the report, information identifying the person accused of the offense, a description of the circumstances of the alleged offense with reference to the applicable CAR provision, a statement of any evidence, the signature of the compiling officer, and the signature or a note of refusal to sign of the accused person [13]. The procedural significance of the report is foundational: it constitutes both the initiating act of the proceedings and the principal evidentiary document on which adjudication is based. The structural deficiencies in report compilation documented in the Soviet and early post-independence period thus continued to exert their consequences downstream in the evidentiary quality of adjudication.

Internal affairs bodies possess, in addition to report-compilation powers, a range of procedural-coercive powers exercisable at the initiation stage: administrative detention of up to three hours, or in specified circumstances up to seventy-two hours with prosecutorial notification (Article 326 CAR); personal inspection and inspection of belongings (Article 329 CAR); inspection of vehicles and cargo (Article 330 CAR); seizure of items and documents (Article 331 CAR); and psychiatric examination referral (Article 332 CAR). These measures collectively constitute what the Uzbek doctrine designates as administrative-procedural coercion (*administrativno-protsessualnoe prinuzhdenie*), as distinct from substantive administrative sanctions [14]. The cumulative coercive impact of these measures on the liberty of persons subject to proceedings is substantial, and their compatibility with the constitutional protection of personal inviolability (Article 25 of the Constitution) has been a recurrent subject of scholarly and institutional analysis.

The adjudicatory competence of internal affairs bodies under the CAR is exercised by designated categories of official: the Head of the Ministry of Internal Affairs of the Republic of Uzbekistan and his deputies, heads of regional and district internal affairs bodies, and senior traffic police officers, each with defined subject-matter and sanctioning jurisdiction [15]. A distinctive feature of the Uzbek model, which Beknazarov has assessed as representing a significant due-process concern, is the absence of a formal hearing requirement in cases decided by internal affairs officials: the applicable CAR provisions permit, and in practice facilitate, summary disposition of many administrative-offense cases without a hearing at which the accused person has the opportunity to present their case before the deciding official.

*Reform of the Internal Affairs System and Its Impact on Administrative Proceedings (2017-Present).* The election of Shavkat Mirziyoyev as President of Uzbekistan and the adoption of the Strategy for the Development of the Republic of Uzbekistan for 2017-2021 (Action Strategy) initiated the most ambitious and structurally

comprehensive reform of Uzbekistan's public institutions since independence [16], [17]. The Action Strategy identified the reform of the judicial-legal system and the protection of citizens' rights and freedoms as one of its five priority directions, with specific commitments to improving the quality of administrative proceedings, reducing the scope for administrative coercion, and strengthening judicial oversight of executive activity.

In the sphere of internal affairs, the programmatic framework for reform was established by Presidential Decree No. PP-2900 of 10 April 2017, which identified as core objectives: the transition from a punitive to a service-oriented model of policing; the elimination of unlawful practices in the detection and documentation of administrative offenses; the professionalisation of internal affairs personnel through enhanced legal training; and the introduction of accountability mechanisms to monitor the quality of administrative proceedings [18], [19]. These commitments were elaborated in subsequent decrees, including Presidential Decree No. PP-3723 of 16 October 2018, which approved a comprehensive programme for the development of the MIA for 2018-2020 with specific performance indicators for administrative-proceedings quality improvement.

At the legislative level, Law No. ZRU-613 of 15 April 2019 introduced a substantial package of amendments to the CAR specifically directed at internal affairs bodies' administrative-proceedings practice. Key provisions included: strengthening of the mandatory content requirements for administrative-offense reports with explicit invalidity consequences for material deficiencies; an extension of the accused person's right to access a lawyer from the moment of administrative detention rather than only upon formal referral to adjudication; the introduction of video-recording requirements for certain categories of coercive procedural measures conducted by internal affairs officers; and a narrowing of the categories of administrative offenses that can be decided by internal affairs officials without judicial referral, with a corresponding expansion of mandatory judicial review [20].

Presidential Decree No. UP-6247 of 24 February 2021 established as a medium-term reform objective the comprehensive digitalisation of internal affairs bodies' administrative proceedings, including electronic compilation and transmission of administrative-offense reports, digital case management systems, and electronic payment platforms for administrative fines. The digitalisation programme, assessed by Normatov as a potentially transformative instrument for improving procedural quality and accountability, responds to international findings that the opacity of paper-based administrative proceedings significantly hampers both prosecutorial supervision and judicial review of internal affairs bodies' administrative activity.

A significant dimension of the contemporary reform process is the engagement of international expert bodies in assessing the administrative-offense proceedings framework [21]. The Venice Commission's 2021 Opinion on the Administrative Code identified as priority concerns: the insufficient separation of prosecution and adjudication functions within internal affairs bodies; the inadequate development of the right to legal representation throughout proceedings; the limited scope of judicial review available to challenge administrative sanctions imposed by internal affairs officials; and the absence of explicit proportionality analysis requirements in the CAR's sanctioning provisions. These findings have informed subsequent domestic reform discussions and are referenced in the EU-Uzbekistan Partnership and Cooperation Agreement's human rights dialogue framework [22].

The judicial reform decree of February 2017, operating in parallel with the internal affairs reform programme, strengthened the administrative judiciary's capacity to review administrative-offense cases by establishing specialised administrative court chambers within the general court system, enhancing judicial training in administrative law, and reducing court fees for administrative review applications. UNDP's 2021 assessment noted that the number of judicial challenges to administrative-offense decisions by

internal affairs bodies increased significantly following these reforms, indicating an expansion of practical access to judicial review, though absolute rates remain relatively modest by comparison with European benchmarks.

*Comparative Perspectives and Structural Assessment.* A comparative assessment of Uzbekistan's administrative-offense proceedings system by reference to the experiences of other post-Soviet states and to international standards reveals both the extent of achieved reform and the structural challenges that remain [23]. Among the Central Asian post-Soviet states, Uzbekistan's administrative-offense proceedings framework is, by most assessments, the most elaborately codified and the most extensively engaged with international normative standards, though Kazakhstan's judicial-reform experience and Kyrgyzstan's relatively liberal administrative-proceedings tradition offer instructive comparative reference points.

The structural challenge most consistently identified across comparative analyses is the tension between the efficiency rationale for vesting adjudicatory competence in internal affairs bodies and the due-process imperative of separating accusatory and adjudicatory functions [24]. This tension is not unique to post-Soviet systems: analogous debates surround the role of police in traffic enforcement adjudication in many Western European systems and the broader question of whether administrative sanctions of a punitive character can legitimately be imposed by executive agencies without judicial determination. The resolution adopted in the most procedurally advanced systems typically involves reserving to administrative agencies only those cases involving minor offenses with low-level sanctions, while subjecting all cases involving significant financial penalties, deprivation of rights, or liberty-restricting measures to mandatory judicial determination [25].

The OECD/SIGMA assessment identified Uzbekistan's administrative-proceedings framework as reflecting 'significant progress in formal legislative alignment with good governance principles, accompanied by persistent implementation gaps in operational practice,' a characterisation that captures the central dynamic of the reform process. Human Rights Watch's 2021 report on Uzbekistan noted continuing concerns about the use of administrative proceedings, and specifically of administrative detention, as instruments of pressure against civil society activists, journalists, and political opponents, reflecting the potential for instrumentalisation of administratively flexible proceedings in the absence of robust independence guarantees for the adjudicatory function [26].

The SIGMA framework for assessing public administration quality, with its emphasis on legality, proportionality, equal treatment, and judicial reviewability as core principles of administrative law, provides a useful benchmark against which to assess the trajectory of Uzbekistan's administrative-offense proceedings reform. Against these benchmarks, the Uzbek system's most significant structural deficits remain: the incomplete separation of initiation and adjudication within internal affairs bodies; the limited practical availability of legal representation from the earliest stages of administrative-offense proceedings; the inconsistent application of proportionality analysis in sanctioning decisions; and the still-developing institutional independence of the administrative judiciary from executive influence.

## **Conclusion**

The genesis of the activity of internal affairs bodies of the Republic of Uzbekistan in administrative-offense proceedings reveals a developmental trajectory of digitalization by institutional continuity with Soviet administrative-law architecture, gradual normative adaptation to post-independence constitutional requirements, and, since 2017, accelerating engagement with international standards of due process and good governance. Four developmental phases have been identified and analysed: the Soviet foundations, in which the conceptual and institutional framework of administrative-offense proceedings was established within the Uzbek SSR as a constituent element of the union-wide administrative-law system.

The structural analysis has identified the dual function of internal affairs bodies as both case-initiating and adjudicatory authorities as the central tension requiring resolution in the further development of Uzbekistan's administrative-offense proceedings system. Progressive restriction of non-judicial adjudicatory competence to genuinely minor offenses, expansion of mandatory judicial review for all cases involving significant sanctions, systematic of internal affairs personnel in procedural rights, and proceedings as a transparency and accountability instrument represent the principal reform priorities identified by domestic scholars, international monitoring bodies, and comparative analysis alike.

The genesis traced in this article is thus not merely a historical account but a map of the institutional and normative forces that will shape the further evolution of administrative-offense proceedings in Uzbekistan. The trajectory is toward a system in which internal affairs bodies operate as professionally competent, procedurally disciplined case-initiating authorities, while the adjudicatory function migrates progressively toward an independent administrative judiciary capable of providing the quality of rights protection required by the constitutional commitment to a law-governed state and by Uzbekistan's international human rights obligations. How rapidly and completely this trajectory is realized will depend not only on further legislative reform but on the sustained institutional investments in judicial independence, legal education, and administrative culture that translate normative ambition into operational reality.

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