

INFORMATION BULLETIN NO. 86¹

ON REGULATORY INITIATIVES OF GOVERNMENT AUTHORITIES THAT MAY AFFECT
CIVIL RIGHTS AND THE LEGAL ENVIRONMENT FOR CIVIL SOCIETY ORGANIZATIONS

October 5, 2026

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All previous issues of the information bulletin are available [here](#).

¹This translation was prepared using artificial intelligence (AI).

1. Draft Personal Data Protection Development Strategy Posted for Public Discussion

On September 28, the State Agency for Personal Data Protection under the Cabinet of Ministers posted for public discussion a draft Resolution of the Cabinet of Ministers on Approval of the Personal Data Protection Development Strategy in the Kyrgyz Republic for 2026–2030 and the Roadmap for Its Implementation.

According to the explanatory note, the draft was developed pursuant to [paragraph 369 of the Action Plan of the Cabinet of Ministers of the Kyrgyz Republic for 2026](#) to implement the National Development Program of the Kyrgyz Republic through 2030. The main areas of the draft Strategy are as follows:

- It is proposed to improve the protection of citizens' personal information and strengthen government oversight in this area.
- Protection against personal data leaks, unauthorized access, and other digital threats is to be strengthened.
- The draft provides for the creation of secure digital services, the training and professional development of specialists, and an increase in the population's digital literacy.
- It is proposed to draw on international experience and modern personal data protection standards and to develop cooperation with foreign partners.

For the practical implementation of the Strategy, it is proposed to approve a Roadmap that will set out specific activities and key steps for 2026–2030.

You may review the draft and submit comments until October 13, 2026, at this [link](#).

2. Draft Regulation on Artificial Intelligence Ethics Posted for Public Discussion

On September 28, the Ministry of Digital Development and Innovative Technologies posted for public discussion a draft Resolution of the Cabinet of Ministers on Approval of the Regulation on Artificial Intelligence Ethics in the Kyrgyz Republic.

The draft was developed to create a trustworthy, safe, and transparent environment for the development, deployment, and use of artificial intelligence (AI) technologies; to protect citizens' rights, freedoms, and legitimate interests; to preserve the national cultural heritage; and to strengthen the digital sovereignty of the Kyrgyz Republic.

The main objectives of the draft are:

- to establish common ethical guidelines and principles for actors in the AI sector at every stage of the life cycle of artificial intelligence systems (hereinafter, AIS);

- to determine the procedures and mechanisms for conducting independent assessments of the ethics and safety of AIS and for preparing an AI Ethics Declaration;
- to prevent algorithmic discrimination, undisclosed use of AIS, and distortion of the norms of the state (Kyrgyz) language.

The draft also addresses the protection of historical and cultural heritage. It is proposed to restrict the creation by AI of false content that could harm the honor, dignity, and reputation of historical figures and public officials of Kyrgyzstan.

The draft provides for greater transparency in the use of artificial intelligence. In particular, a person must understand when they are interacting with an AI bot or digital agent rather than a human.

You may review the draft and submit comments until October 13, 2026, at this [link](#).

3. Draft Cabinet of Ministers Resolution on the Procedure for Providing Services Proactively Posted for Public Discussion

On September 11, a draft Resolution of the Cabinet of Ministers of the Kyrgyz Republic on Approval of the Procedure for Providing Services Proactively, initiated by the Ministry of Economy and Commerce, was posted for public discussion. The draft Resolution was developed pursuant to the new [Law of the Kyrgyz Republic on Services Provided by State Bodies and Local Self-Government Bodies](#), which enters into force on October 17, 2026, and is intended to establish a unified procedure for the proactive provision of state and municipal services.

A proactive service is a service that the state provides on its own initiative, without requiring a citizen or entrepreneur to apply for it. In other words, when a particular life or business event occurs, state bodies and local self-government bodies will be able to independently determine which service may be provided to a person and initiate the process for obtaining it.

According to the draft, a service will follow a defined process—from identifying the event and verifying eligibility for the service to making a decision and delivering the result. Depending on the type of service, the recipient will either be notified that the service is being provided or be asked to give prior consent.

Digital interaction among state bodies and information systems will play an important role in this process. This will make it possible to use information already held by the state and avoid requiring citizens to resubmit information that is already in the state's possession.

At the same time, a citizen will be able to decline the proactive provision of a service, withdraw previously given consent, correct technical errors, request review of a decision made automatically, and appeal that decision in accordance with the established procedure. In

addition, it will remain possible to obtain a service in the traditional way by submitting an application.

The draft is available on the Unified Public Discussion Portal at this [link](#).

4. Amendments to the Code of Offenses Providing for Rewards to Citizens Posted for Public Discussion

On September 14, a draft Law on Amendments to the Code of Offenses of the Kyrgyz Republic was posted for public discussion. It proposes regulating rewards for citizens who report offenses. The draft was initiated by the Bishkek Mayor's Office. The initiative is intended to provide material incentives for the public to assist authorized bodies in protecting municipal and public interests.

Under the draft Law, a person who reports reliable information about an offense being planned, in progress, or already committed is entitled to a monetary payment. A reward is payable if the information helped prevent the offense, identify the offender, hold the offender accountable, or seize property obtained through the offense. The reward is set as a percentage of the fine imposed or the value of the seized property and ranges from five to twenty percent. A citizen has the right to request that identifying information be kept confidential, except where disclosure is required by law or a court decision. Accomplices to the offense are not eligible for a payment.

As noted in the explanatory note to the draft, in practice citizens are often direct witnesses to violations involving public-area maintenance rules, sanitary upkeep of territories, waste disposal, and the use of urban infrastructure. However, current legislation does not provide a comprehensive mechanism for financially rewarding citizens who supply reliable information. This draft Law is intended to fill that gap, and the procedure for payments and protection of informants' rights will be determined by the Cabinet of Ministers.

Comments on this draft Law may be submitted until October 14, 2026, through the Unified Portal for Public Discussion of Draft Regulatory Legal Acts at the following [link](#).

5. Draft Ministry of Justice Order Providing for Exceptions to Qualification Requirements for Legal Representatives Posted for Public Discussion

On September 16, a draft Order of the Ministry of Justice on Approval of the Regulation on the Procedure for Applying Exceptions to Qualification Requirements for Legal Representatives in Certain Administrative-Territorial Units of the Kyrgyz Republic was posted for public discussion. The draft was prepared pursuant to [Article 164 of the Law on the Bar of the Kyrgyz Republic, the Practice of Law, and Legal Representatives in the Kyrgyz Republic](#). As noted in the explanatory note, the draft was prepared to make legal assistance more accessible to citizens living in districts where there are currently too few specialists providing such assistance.

Under Article 164 of the above Law, legal representatives must meet three main requirements:

- a university degree in law;
- at least one year of professional legal experience;
- completion of additional professional training in court representation at the Advocates' Training Center and receipt of the relevant certificate.

At the same time, Article 164 of the Law authorizes the Ministry of Justice to determine in which administrative-territorial units specific requirements for legal representatives may be temporarily waived. This option is intended to take into account differences in access to legal assistance across the country's regions.

The proposed Order establishes the procedure for using this mechanism. The draft identifies six districts:

- 1) Jumgal District, Naryn Region;
- 2) Ak-Talaa District, Naryn Region;
- 3) Chon-Alai District, Osh Region;
- 4) Chatkal District, Jalal-Abad Region;
- 5) Toguz-Toroo District, Jalal-Abad Region;
- 6) Ton District, Issyk-Kul Region.

For persons with a university degree in law in these districts, it is proposed to temporarily waive the requirements for at least one year of professional experience and for additional professional training. For persons with a university degree in another field (not law), it is proposed to waive the requirements for a university degree in law and one year of professional experience. The requirement to complete additional professional training remains in effect.

In addition, the draft Order proposes that, throughout the Kyrgyz Republic, certain requirements for legal representatives not apply when they provide representation:

- in cases involving the recovery of child support;
- in cases involving recovery of funds where the amount in controversy does not exceed 10,000 soms.

The proposed exceptions will remain in effect through December 31, 2028. The draft Order of the Ministry of Justice of the Kyrgyz Republic is available [here](#).

6. Amendments to the Law on Civil Protection Posted for Public Discussion

On September 9, the Ministry of Emergency Situations posted draft amendments to the Law on Civil Protection for public discussion. The initiative is intended to ensure that the needs of different population groups are taken into account in emergency preparedness, response, and recovery.

The draft Law proposes introducing an “inclusive approach” to civil protection, defined as a set of principles and measures that take into account the needs and capabilities of vulnerable population groups. This approach must be applied at every stage of emergency management—prevention, preparedness, risk reduction, response, and subsequent recovery.

The draft also expands the responsibilities of the state civil protection system. In particular, it is proposed to:

- develop and implement legal measures to protect the population and territories from emergencies using an inclusive approach and taking into account the demographic and gender characteristics of different population groups;
- take into account the needs of persons with disabilities and other vulnerable groups when planning and carrying out civil protection activities.

This applies, in particular, to persons with disabilities, older persons, children, pregnant women, and other citizens who may require additional support during an emergency. In practice, an inclusive approach may have implications for the accessibility of warning systems, evacuation plans, temporary shelters, and humanitarian assistance.

According to the explanatory note, the draft Law was developed pursuant to the National Action Plan for Achieving Gender Equality in the Kyrgyz Republic for 2026–2027 and to implement Article 11 of the Convention on the Rights of Persons with Disabilities, ratified by the Kyrgyz Republic on March 13, 2019, by Law No. 34. Article 11 of the Convention requires States to take all necessary measures to ensure the protection and safety of persons with disabilities in emergencies, including armed conflicts, humanitarian crises, and natural disasters.

Thus, the proposed amendments are intended to ensure that the civil protection system takes into account the characteristics and needs of all population groups and provides an equal level of protection and safety in emergencies.

The text of the draft Law and its explanatory note are available [here](#).

7. Draft Constitutional Law on States of Emergency and Martial Law Posted for Public Discussion

On September 11, the Ministry of Defense posted for public discussion a draft Constitutional Law on Amendments to Certain Legislative Acts of the Kyrgyz Republic (the Constitutional Laws of the Kyrgyz Republic on a State of Emergency and on Martial Law).

The draft proposes clarifying the procedure for introducing and applying states of emergency and martial law. In particular, it proposes expanding the grounds for introducing a state of emergency to include acts of terrorism and armed incidents at the state border, as well as clarifying the procedure for imposing a curfew.

A curfew temporarily restricts citizens' presence and movement. It is imposed for a specified period to maintain public order and security. While a curfew is in effect, citizens are prohibited from being outside their places of residence or traveling between populated areas without special permits and identity documents. The draft proposes establishing the procedure for applying this measure, including its duration and hours of operation.

In addition, the draft proposes clarifying the list of measures that may be applied during martial law. In particular, it provides for the possibility of military censorship of postal items, telecommunications messages, media publications, and telephone conversations, including communications sent outside the Kyrgyz Republic.

The draft and its explanatory note are available on the Unified Portal for Public Discussion of Draft Regulatory Legal Acts at the following [link](#).

8. Amendments to the Law on Refugees Posted for Public Discussion

On September 17, a draft Law on Amendments to the Law on Refugees, initiated by the Ministry of Labor, Social Security and Migration, was posted for public discussion. The draft Law proposes establishing grounds on which an application for refugee status may not be registered. In particular, this would apply when:

- the person was previously denied refugee status and no new or newly discovered circumstances have arisen;
- the person was convicted by a final court judgment of a serious crime committed in the Kyrgyz Republic;
- the person previously held refugee status but voluntarily left Kyrgyzstan for their country of origin or a third country for permanent residence;
- there are substantial grounds for believing that, before arriving in Kyrgyzstan, the person committed a serious non-political crime outside the country.

It is also proposed to provide for revocation of refugee status if the person does not apply to renew an expired refugee certificate within the following year.

During the public discussion, the Public Foundation Adilet Legal Clinic and the National Office of the United Nations High Commissioner for Refugees in the Kyrgyz Republic submitted comments on the draft Law. Their positions, as well as the text of the draft Law and its explanatory note, are available at the [link](#).

9. Law Establishing the Date of the Election of the President of the Kyrgyz Republic Enters into Force

On September 17, the President of the Kyrgyz Republic signed amendments to the Law on the Rules of Procedure of the Jogorku Kenesh of the Kyrgyz Republic. Under the amendments, the regular election of the President of the Kyrgyz Republic will be held on the fourth Wednesday of January in the year in which the President's elected term expires. The election is called by the Jogorku Kenesh of the Kyrgyz Republic no later than four months before election day.

The Law is available at this [link](#). On September 26, 2026, the Jogorku Kenesh adopted a resolution setting Wednesday, January 27, 2027, as the date of the next election of the President of the Kyrgyz Republic.

10. Date Set for the Next People's Kurultai

On September 3, 2026, Decree No. 309 of the President of the Kyrgyz Republic on Holding the Fifth People's Kurultai was signed. The Decree sets December 18, 2026, as the date for the next Kurultai. The Decree also approves:

- the allocation of quotas for 700 delegates to the People's Kurultai;
- the composition of the organizing committee responsible for holding the People's Kurultai, electing its delegates, and coordinating them;
- the Temporary Regulation on the organizing committee responsible for holding the People's Kurultai, electing its delegates, and coordinating them.

11. Public Council Established under the Akyikatchy (Ombudsman) Institute

A public council has been established under the Akyikatchy (Ombudsman) Institute of the Kyrgyz Republic. It is an independent advisory, consultative, and expert body intended to facilitate ongoing interaction between the Ombudsman and civil society, human rights organizations, and the expert community.

The establishment of the council creates a new channel for civic participation in the work of the national human rights institution. Its members are expected to be able to draw the

Akyikatchy Institute's attention to pressing and systemic human rights issues, propose topics for monitoring, and participate in discussions of response measures.

More information about the council and its members is available on the [Akyikatchy Institute website](#).