

Uzbekistan's War on Forced Labor: From Systemic Eradication to Sustainable Reform (2021-2025)

Jurabek Rasulov

Tashkent State University of Law, Department of International Law and Human Rights, PhD

Abstract: This article analyzes Uzbekistan's significant transition from a state-orchestrated system of forced labor in its cotton sector to a period of ongoing, complex reforms aimed at establishing sustainable labor rights. It chronicles the historical context of the international boycott led by the Cotton Campaign, which, combined with internal political will, led to the eradication of systemic and child forced labor, as verified by the International Labour Organization (ILO) in 2021. The subsequent lifting of the boycott in 2022 marked a pivotal success, largely attributed to the abolition of the state-mandated cotton quota system.

The paper argues that while top-down prohibition has been successful, Uzbekistan now faces “second-generation” challenges. These include the emergence of localized coercion in the privatized agricultural sector, significant weaknesses in the legal framework that hinder accountability for perpetrators, and a constrained environment for independent civil society and trade unions. The analysis details the legislative overhaul, including a new Constitution and Labor Code, but points out critical flaws, such as treating first-time forced labor offenses as administrative rather than criminal violations. It also examines the evolution of institutional frameworks like the National Commission on Issues of Combating Human Trafficking and Decent Work and the enhanced powers of the State Labor Inspectorate.

The article further explores the maturing partnership with the international community, highlighting the shift from scrutiny to technical cooperation through initiatives like the ILO's Decent Work Country Programme (2021-2025) and the joint ILO-IFC “Better Work” program, which aims to embed high labor standards in the burgeoning textile industry. The crucial role of International Financial Institutions, such as the World Bank and the EBRD, in financing and supporting these reforms is also underscored.

In conclusion, the report posits that while the victory over systemic forced labor is historic, the long-term sustainability of these gains depends on shifting from state-led prohibition to a multi-stakeholder accountability model. Key recommendations include criminalizing all instances of forced labor, building the capacity of the State Labor Inspectorate, and linking international support to measurable progress on unresolved issues like freedom of association and criminal liability reform.

Keywords: Uzbekistan, forced labor, child labor, cotton industry, labor rights, human rights, legal reform, institutional reform, International Labour Organization (ILO), Cotton Campaign, Decent Work, Better Work Programme, State Labor Inspectorate, international relations, economic development.

I. Introduction: A Paradigm Shift in Labor Rights

The Republic of Uzbekistan's campaign against forced labor has transitioned into a new, more intricate phase. For decades, the nation's cotton sector was synonymous with one of the world's largest state-orchestrated systems of forced labor, mobilizing millions of citizens, including children, for the annual harvest [1]. This practice prompted widespread international condemnation, culminating in a formidable, 13-year boycott of Uzbek cotton led by the Cotton Campaign, a global coalition of human rights groups and over 330 international brands [1]. The sustained economic and reputational pressure

from this boycott, combined with the political will for reform following the rise of President Shavkat Mirziyoyev, created the conditions for a historic transformation [2].

The critical inflection point arrived between 2021 and 2022. The International Labour Organization (ILO), which had been conducting third-party monitoring in the country since 2015, released its landmark 2021 harvest report, verifying that Uzbek cotton was, for the first time, free from systemic child labor and systemic forced labor [7]. The report found that 99% of workers in the 2021 harvest participated voluntarily, with only isolated instances of coercion remaining [3]. This verification was the direct trigger for the Cotton Campaign's decision in March 2022 to formally end its global boycott, a move celebrated as a monumental victory for human rights and a testament to the power of coordinated international pressure and domestic reform [4]. This achievement was underpinned by fundamental government reforms, most notably the abolition of the state-mandated cotton production quota system that had long driven the demand for forced labor [5].

The eradication of the centralized, state-imposed system marks a profound success. However, it has also unmasked a second generation of challenges that define the current era of reform. The period from 2022 to 2025 is characterized by the difficult transition from top-down prohibition to the embedding of genuine, sustainable labor rights within a rapidly liberalizing economy. While the central government no longer orchestrates forced labor, new forms of localized coercion have emerged within the newly privatized agricultural sector. The legal framework, though improved, contains critical weaknesses that hinder accountability. Most importantly, a severely constrained environment for independent civil society and trade unions creates an accountability vacuum, threatening the long-term durability of the progress achieved. This report analyzes these complex dynamics, evaluating the legislative and institutional overhaul, the evolving partnership with the international community, and the persistent risks that challenge Uzbekistan's path toward truly decent work.

II. The Legislative and Institutional Overhaul: Building a New Foundation

In the last four years, Uzbekistan has erected a formal architecture of laws and institutions designed to codify and enforce the prohibition of forced labor. This new foundation represents a significant departure from the past, yet a closer analysis reveals a persistent gap between progressive policy and on-the-ground enforcement, rooted in both legal loopholes and challenges of institutional capacity.

Legislative Milestones: The New Constitution and Labor Code. The legislative centerpiece of the recent reforms is the new Labor Code, which was developed with technical assistance from the ILO and came into effect on April 30, 2023 [6]. This comprehensive document codifies prohibitions against forced labor and aims to improve employment guarantees for vulnerable populations, including victims of human trafficking [6]. Article 7 of the code explicitly enshrines the principle of “freedom of labor and prohibition of forced labor” [7]. This was further reinforced by a new national Constitution, approved by referendum in April 2023, which for the first time explicitly prohibits child and forced labor and introduces the aspirational concept of a right to “decent work” [7].

Despite these positive headline reforms, a critical flaw persists within the legal framework, significantly weakening its deterrent effect. Under Article 51 of the Code of Administrative Responsibility and Article 148(2) of the Criminal Code, a first-time offense involving the forced labor of an adult is treated as an administrative violation, punishable by a fine [8]. Criminal liability, which can include imprisonment, is typically reserved only for repeat offenders or in cases involving minors [9]. This distinction has been consistently identified by international observers, including the U.S. State Department, as a primary obstacle to effective enforcement and a key reason for Uzbekistan's continued Tier 2 ranking in its Trafficking in Persons reports [8]. This legal structure creates a path of least resistance for the justice system, incentivizing the application of lesser administrative penalties rather than pursuing criminal prosecutions that would provide more meaningful justice for victims and a stronger deterrent against perpetrators. The low number of criminal prosecutions for forced labor

compared to the higher number of administrative penalties levied against officials underscores this implementation gap [9].

Institutional Evolution: *The National Commission and State Labor Inspectorate.* The primary state body for coordinating policy has also evolved. The National Commission on Combating Human Trafficking and Forced Labor, established in 2019, was a key player in orchestrating the reforms [10]. In a significant move in December 2023, it was transformed by presidential decree into the *National Commission on Issues of Combating Human Trafficking and Decent Work*.²³ This rebranding reflects a strategic shift from a narrow focus on prohibition to a broader mandate of promoting positive labor standards. The commission remains under the leadership of the Chairperson of the Senate, Tanzila Narbayeva, and now includes dedicated sub-commissions on human trafficking and on decent labor, with an expanded scope covering issues like irregular labor migration and comprehensive victim support [11].

Parallel to this, the government has undertaken critical reforms to empower the State Labor Inspectorate (SLI), the key enforcement agency. For years, a major impediment to its effectiveness was a legal requirement for inspectors to obtain prior approval from the Business Ombudsman before conducting unannounced inspections of private sector enterprises – a clear conflict of interest[7]. A new Presidential Decree in September 2024, supported by the provisions of the new Labor Code, formally abolished this procedure [12]. The SLI is now empowered to conduct both announced and unannounced inspections without external permission, significantly strengthening its oversight capabilities [12].

This newfound authority has been augmented by technology. The SLI has undergone a first phase of digitalization, creating a unified database integrated with the national tax and labor systems. This gives inspectors direct access to information on all registered companies, taxpayers, and employment contracts, including for non-traditional workers [12]. These reforms have yielded tangible results, with the number of self-initiated inspections increasing dramatically. After conducting 920 such inspections in 2023, the number exceeded 3,000 in just the first five months of 2025[12]. While these institutional changes are positive, the primary bottleneck for progress is shifting from the creation of laws to the operational capacity and independence of these enforcement bodies. Observers note a pressing need to significantly increase the number of qualified inspectors and provide them with specialized training to identify and investigate complex cases of forced labor and human trafficking, which are often hidden within the informal economy or complex supply chains [9].

III. The Evolving Partnership with the International Community

Uzbekistan's relationship with international partners has matured significantly, transitioning from a dynamic of intense scrutiny to one of proactive technical cooperation. This evolution reflects the country's tangible progress and its ambition to integrate more deeply into the global economy, with the International Labour Organization (ILO) and International Financial Institutions (IFIs) playing central roles.

The Decent Work Country Programme (2021-2025). Building on the success of previous cooperation focused on eradicating forced labor, the ILO and its Uzbek tripartite constituents (government, employers' and workers' organizations) signed a new, more ambitious *Decent Work Country Programme (DWCP) for 2021-2025* in September 2021 [13]. The program marks a strategic pivot from a reactive, problem-solving agenda to a proactive one aimed at building a modern labor market. Its core priorities are no longer solely about prohibition but encompass a broader vision for decent work, including:

- Improving the regulatory framework for labor relations to align with international standards.
- Enhancing employment opportunities, particularly for youth, women, and vulnerable groups.

- Extending social protection coverage.
- Strengthening the institutional capacity of social partners, namely trade unions and employer organizations, to engage in effective social dialogue.

The DWCP is deeply integrated with Uzbekistan's national development strategies and the United Nations Sustainable Development Cooperation Framework, signaling its centrality to the country's broader reform agenda [13].

The “Better Work” Programme: Embedding Standards in the Textile Industry. A direct outcome of the end of the cotton boycott and the subsequent boom in the textile sector was the launch of the joint ILO and International Finance Corporation (IFC) “Better Work” program. Following a feasibility study in 2022, a Memorandum of Understanding was signed in May 2023, and the program became operational [14]. This initiative is a clear example of a virtuous cycle in action: Uzbekistan's success in ending systemic forced labor created a new economic reality – a burgeoning textile industry eager for access to Western markets – which in turn generated domestic demand for a program that could help factories meet the stringent social compliance standards of international brands [14].

The Better Work program aims to improve both working conditions and business competitiveness in textile and garment factories. It employs a proven model based on an annual cycle of unannounced compliance assessments, tailored advisory services, and factory-level training [14]. Crucially, the program also works beyond the factory gates, liaising with international buyers to promote responsible purchasing practices and supporting national-level legal and policy reforms, with a particular focus on the right to freedom of association and collective bargaining (ILO Conventions 87 and 98) [15]. With initial funding from the European Bank for Reconstruction and Development (EBRD), the program has registered its first cohort of factories and commenced its assessment and training cycles, representing a critical tool for building the trust necessary to attract and sustain responsible international investment [16].

The Role of International Financial Institutions (IFIs). IFIs have been indispensable partners in Uzbekistan's transformation. The World Bank has played a pivotal role, not only by administering the Multi-Donor Trust Fund that financed the ILO's crucial third-party monitoring but also by providing substantial direct financial support [1]. Between 2018 and 2021, the Bank's Development Policy Operations (DPOs) channeled \$2.1 billion to Uzbekistan, with the cessation of forced labor being a key supported reform area [17].

The EBRD has likewise been a major investor, particularly in financing the large-scale agricultural modernization that was a prerequisite for dismantling the old state-run system. Its investments include a significant financing package of up to \$70 million to Indorama Agro, one of the country's largest private cotton clusters, with the stated aims of introducing advanced technology and promoting economic inclusion [18].

IV. Conclusion and Recommendations

Uzbekistan's journey in combating forced labor is a story of remarkable but incomplete transformation. The decisive victory over the systemic, state-imposed forced labor that once defined its cotton industry is a historic achievement, rightfully earning international praise and unlocking significant new economic opportunities. This progress, driven by a unique combination of top-down political will and sustained external pressure, has fundamentally altered the country's labor landscape.

However, the reform process is now at a critical juncture. The very success of dismantling the old centralized system has given rise to a new generation of challenges that are more diffuse, complex, and deeply embedded in the country's economic and political structures. The future sustainability of Uzbekistan's labor rights record depends on a crucial pivot: moving from a model of state-led

prohibition to one of genuine, multi-stakeholder accountability, where the rights of workers and farmers are protected not just by decree, but by empowered institutions and a vibrant, independent civil society.

Recommendations

1. Amend Article 148(2) of the Criminal Code to remove the option for administrative penalties for first-time offenses of adult forced labor. Criminalizing all such instances from the outset would align Uzbek law with international standards, provide a more potent deterrent, and ensure more meaningful justice for victims.
2. Continue to build the capacity and operational independence of the State Labor Inspectorate. This includes significantly increasing its staffing levels, providing sustained funding for specialized training in identifying complex forms of forced labor and trafficking, and ensuring inspectors can operate free from political or commercial pressure at both the national and local levels.
3. Continue to provide vital technical and financial support through programs like the DWCP and Better Work. However, this support should be explicitly linked to measurable progress on core, unresolved issues, particularly freedom of association, the protection of civil society activists, and the reform of criminal liability for forced labor.

References:

1. Weaving a New Future in Uzbekistan's Cotton Sector - World Bank, <https://www.worldbank.org/en/news/feature/2025/05/27/weaving-a-new-future-in-uzbekistan-s-cotton-sector>
2. Uzbekistan Ends Systemic Forced Labor, Civil Society Says - Human Rights Watch, <https://www.hrw.org/news/2022/03/11/uzbekistan-ends-systemic-forced-labor-civil-society-says>
3. Uzbek cotton is free from systemic child labour and forced labour, <https://www.ilo.org/resource/news/uzbek-cotton-free-systemic-child-labour-and-forced-labour>
4. Cotton Campaign Ends its Call for a Global Boycott of Cotton from Uzbekistan, <https://www.cottoncampaign.org/news/cotton-campaign-ends-its-call-for-a-global-boycott-of-cotton-from-uzbekistan>
5. Cotton Campaign ends boycott of Uzbek cotton, <https://htnc.uz/en/news/167>
6. 2022 Findings on the Worst Forms of Child Labor: Uzbekistan, https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2022/Uzbekistan.pdf
7. Findings on the Worst Forms of Child Labor - Uzbekistan, <https://www.dol.gov/agencies/ilab/resources/reports/child-labor/uzbekistan>
8. 2023 Trafficking in Persons Report: Uzbekistan - State Department, <https://www.state.gov/reports/2023-trafficking-in-persons-report/uzbekistan>
9. 2024 Trafficking in Persons Report: Uzbekistan - State Department, <https://2021-2025.state.gov/reports/2024-trafficking-in-persons-report/uzbekistan/>
10. Ўзбекистон Республикаси Президентининг “Одам савдосига ва мажбурий меҳнатга қарши курашиш тизимини янада такомиллаштиришга оид қўшимча чора-тадбирлар тўғрисида”ги ПФ-5775-сон фармони // <https://lex.uz/docs/4616405>
11. National commission on issues of combating human trafficking and ..., <https://www.gazeta.uz/en/2023/12/24/national-commission/>
12. Committee on the Application of Standards Commission de l ...,

<https://www.ilo.org/sites/default/files/2025-06/ILC113-CAN-PV19-Ouzbekistan%20as%20amended-%5BNORMES-250528-005%5D-EFS.pdf>

13. ILO – Uzbekistan cooperation is on track: Decent Work Country Programme for 2021-2025 signed, <https://www.ilo.org/resource/news/ilo-%E2%80%93-uzbekistan-cooperation-track-decent-work-country-programme-2021-2025>
14. Better Work in Uzbekistan: Let's Support the Industry Together, <https://uzts.uz/en/better-work-in-uzbekistan-lets-support-the-industry-together/>
15. Better Work Uzbekistan, <https://betterwork.org/wp-content/uploads/Better-Work-Uzbekistan-Update.pdf>
16. ILO and IFC Launch New Better Work Programme to Bolster Uzbekistan's Textile and Garment Industry, 2025, <https://www.ifc.org/en/pressroom/2023/ilo-and-ifc-launch-new-better-work-programme-to-bolster-uzbekist>
17. Helping Uzbekistan Undertake a Historic Social and Economic Transformation - World Bank, <https://www.worldbank.org/en/results/2024/07/16/helping-uzbekistan-undertake-a-historic-social-and-economic-transformation>
18. EBRD helps Indorama introduce advanced cotton farming technologies in Uzbekistan, <https://www.ebrd.com/home/news-and-events/news/2021/ebrd-helps-indorama-introduce-advanced-cotton-farming-technologies-in-uzbekistan.html>