



Uzbekistan Legal Newsletter

JULY 2025

UZBEKISTAN LEGAL NEWSLETTER: JULY 2025

Several important legal developments took place in July 2025. These included the adoption of the Law “On the Limitation of Greenhouse Gas Emissions”, which, among other provisions, regulates carbon credit trading; the adoption of the new Water Code consolidating water use legislation; measures to implement initiatives announced at the 3rd Plenary Session of the Foreign Investors Council under the President; the introduction of a pre-trial tax dispute resolution mechanism; improvements to customs regulations; and the adoption of administrative procedures for registering IP transfer agreements and certain categories of IP rights.

1. LAW ON GREENHOUSE GAS EMISSIONS

On 7 July 2025, the Law “On the Limitation of Greenhouse Gas Emissions” was adopted. It enters into force on 9 January 2026 and, among other things, introduces the following:

- the Law defines greenhouse gases (GHG), GHG emissions and reductions, carbon footprints, carbon credits, green projects, and participants of the carbon credit trading market. Projects aimed at reducing GHG emissions are qualified as green projects, with detailed eligibility criteria to be approved by the Cabinet of Ministers;
- carbon credits must be verified before issuance. Their disposal is managed by the government of Uzbekistan. Private entities may sell part of the credits generated in Uzbekistan to foreign buyers only with the approval of the Ministry of Economy and Finance (MoEF). The Cabinet of Ministers will establish procedures for such sales;
- entities emitting GHG will be included in a special register maintained by the MoEF. Regulated entities must submit annual reports to the MoEF by 1 July, which will be published to ensure transparency. The Cabinet of Ministers will define: (i) criteria for inclusion in the register; (ii) reporting procedures; and (iii) reports verification rules;
- the Ministry of Ecology, in coordination with the MoEF, will maintain the GHG emissions register (inventory), and the GHG cadastre, as well as collect compensation payments from emitters;
- the Green Energy Projects Centre under the MoEF will operate the carbon credit registry. Credits will be held in accounts opened with the Centre, and all registry operations will be conducted under a contract with it. The Cabinet of Ministers will approve: (i) procedures for maintaining the register and (ii) a model agreement governing registry operations and operator fees;
- within 3 months of the Law’s adoption, the Cabinet of Ministers will approve industry-specific target parameters for reducing GHG emissions.

Additionally, the President has adopted a Resolution regulating the participation in the international market of carbon credits:

- by 2030, GHG emissions per unit of national GDP are to be reduced by 35% compared to 2010 level;

- carbon credits may be generated only in sectors covered by the Nationally Determined Contributions¹ and specified in the national GHG inventory, with priority given to credits created through international climate finance;
- 20% of domestically generated carbon credits will be reserved to meet Uzbekistan's emission reduction commitments and to prevent overselling, and will not be traded internationally. The remaining 80% will be sold on the international carbon market, except for credits from projects with state participation (PPPs or other forms), which will be managed by the Cabinet of Ministers. For such projects, the Cabinet of Ministers will determine the volume of credits to be sold, the procedure for engaging servicing organizations, and the distribution of sale proceeds;
- a state duty will be imposed on each carbon credit unit, with the rate to be determined by the Cabinet of Ministers;
- the national carbon credit register as mentioned in the Law will be launched by 1 January 2026;
- the MoEF will oversee the implementation of carbon credit projects and issue approvals for them. By 1 January 2026, it shall submit proposals to amend the Law "[On Licensing, Permitting, and Notification Procedures](#)" to introduce permits for: (i) implementing carbon credit projects; (ii) selling generated carbon credits; and (iii) approving the volumes of credits to be sold;
- within 2 months of the Resolution, the MoEF shall submit to the Cabinet of Ministers a draft regulation on participation in international carbon credit markets;
- within 3 months of the Resolution, the MoEF shall prepare a list of promising green projects.

[Law No. ZRU-1073 of 7 July 2025](#)

[Decree of the President № UP-110 of 7 July 2025](#)

2. ADOPTION OF WATER CODE

On 30 July 2025, a new Water Code was adopted to consolidate water regulations. It will enter into force on 31 October 2025, replacing, among other acts, the current Law "[On Water and Water Use](#)". The Code, among other things, provides for the following:

- the Code introduces legal definitions of water bodies, water facilities, hydraulic structures, and water users. Water bodies are recognised as state property and a national treasure, while water

¹ Under Article 4 of the Paris Agreement, member states set out their objectives and plans - known as Nationally Determined Contributions (NDCs) - to reduce GHG emissions.

facilities may be publicly or privately owned. Facilities constructed by private entities remain in their ownership;

- water may be used for: (i) drinking, household, recreational, therapeutic, and other personal needs; (ii) agricultural, forestry, and hunting purposes; (iii) industrial, energy, transport, and other state or public needs; and (iv) wastewater discharge;
- general use of water bodies covers everyday activities without special equipment and does not require a permit. Special use requires a permit when abstracting more than 5 m³ of water per day, operating pumping stations or hydroelectric plants, or discharging wastewater or collector–drainage water into water bodies or onto land;
- water bodies and facilities may be transferred for permanent (without a set time limit) or temporary use (for a minimum of 3 years and a maximum of 49 years) or operated under PPP arrangements. Outsourcing and PPP projects must be awarded through competitive selection, with direct negotiations prohibited. Private partners are required to supply water, ensure metering and accounting, and modernize facilities within their service zones. Small water facilities may be privatized through auctions, while larger facilities may be managed under PPPs pursuant to a Presidential Decree or a Resolution of the Cabinet of Ministers;
- water abstraction is permitted only under agreements with the State Institution “Water Supply Service” at registered intake points. Users must submit requests physically or electronically;
- the Ministry of Water Resources (MoWR) is designated as the specialised authority for water matters, responsible for maintaining water resource accounting, issuing permits, and ensuring delivery of water within approved limits;
- easements may be established for general use of water resources, passage of individuals and vehicles, watering and driving livestock, use of water bodies as waterways for small vessels, and access to or crossing of coastal zones. Public easements are set by municipalities, while private easements are established by agreement or court decision. Easements do not require a special water use permit, may be subject to charges, and remain valid despite changes in land ownership;
- new and reconstructed industrial facilities must include recirculating (closed-loop) water supply systems, unless technically impossible. Existing enterprises without such systems must agree with the MoWR and the Ministry of Ecology on a transition deadline;
- payments for water use include: (i) water use tax; (ii) fees for water delivery and related services; (iii) payments for purchasing abstraction quotas (quota assignment); (iv) fees for exceeding usage limits; and (v) compensation for environmental pollution. Water supply fees may be partly or fully included in the water use tax.

[Water Code of 30 July 2025](#)

3. THIRD PLENARY SESSION OF FOREIGN INVESTORS COUNCIL

The President has issued a Resolution to implement all commitments made at the third plenary session of the Foreign Investors Council under the President. Key provisions include:

- central and local executive authorities, as well as entities in which the state holds a 50% or greater share, are instructed to ensure integration with the electronic system “Unified Investment Platform”. Current and prospective investment projects must be listed on the platform using the form approved by the Ministry of Investments, Industry and Trade;
- the Action Plan for the Implementation of Proposals and Initiatives Put Forward at the Third Plenary Meeting of the Foreign Investors Council under the President ([Annex 1](#) to the Resolution), which provides that relevant ministries are tasked with submitting to the Cabinet of Ministers draft legal acts covering, among other things:
 - regulation of alternative investments (including venture capital, convertible notes, special currency regimes, etc.);
 - implementation of the OECD Responsible Business Conduct Guidelines;
 - development of corporate governance mechanisms, including simplification of GMP meetings, strengthening of supervisory boards, protection of purchasers of shares in M&A transactions, and introduction of option agreements;
 - optimisation of taxation for interest-free loans between affiliated companies and for dividend distributions by companies with foreign capital;
 - transition from income-based to expenditure-based incentives for investors;
 - optimization of land allocation procedures for investors;
 - streamlining of the pledge register and introduction of pledges over bank accounts, exclusive rights, and participatory interests;
 - introduction of concession agreements for the management of power distribution networks;
 - targeted amendments to the PPP Law, including revocation of the requirement for the Cabinet of Ministers to consent to the termination of PPP agreements;
 - optimization of export duties on certain goods;
 - development of a waste disposal and processing concept in cooperation with the EBRD.

[*Presidential Resolution No. PP-226 of 18 July 2025*](#)

4. PRE-TRIAL SETTLEMENT OF TAX DISPUTES

The President has signed a Resolution establishing the Expert Council on Tax Disputes under the Chamber of Commerce and Industry (the Council). The Council, comprising experts in tax as well as related economic, financial, and legal matters, will handle pre-trial disputes between businesses and tax authorities, analyse tax legislation and practice, and develop proposals for their improvement. It will not review criminal cases or tax disputes already before the courts. The Council’s conclusions will be submitted to the tax authorities, customs authorities, and other relevant bodies, which are obliged to consider them but not bound to follow them. To support its work, the Council is empowered to request necessary documents and information from state bodies and other organizations free of charge, except where prohibited by law.

The Cabinet of Ministers will adopt regulations governing the Council's activities. The Tax Committee has been instructed to facilitate business participation in pre-trial tax dispute resolution and to introduce artificial intelligence into these processes.

[Presidential Resolution No. PP-223 of 11 July 2025](#)

5. IMPROVEMENT OF CUSTOMS REGULATIONS

The Minister of Economy and Finance has signed an Order regulating the procedure for customs authorities to issue preliminary decisions on the applicability of customs exemptions. The Order will enter into force on 2 October 2025 and introduce the following novelties:

- preliminary decisions allow businesses to determine in advance whether specific customs exemptions apply to imported or exported goods. These decisions are binding on customs authorities. However, businesses are not required to obtain such a decision in order to benefit from exemptions;
- applications may be submitted electronically via the Customs Committee's official website or in hard copy to any territorial customs office. They are reviewed within 10 business days. No fee is charged for reviewing an application; a fee applies only upon issuance of a preliminary decision;
- a preliminary decision is valid for three years or for the duration of the relevant exemption period established by law. It may be used at any customs post.

In addition, the Cabinet of Ministers has adopted a Resolution establishing the Appeal Council for Resolving Customs-Related Issues of Businesses under the Customs Committee (the Council). The Council reviews claims submitted by businesses and issues recommendations to customs authorities. It also provides opinions on the customs value of goods—taking into account economic and sectoral factors, as well as the practices of major manufacturers—and on the correct application of customs preferences. Claims may be submitted physically or electronically through customs authorities and must be reviewed by the Council within 15 days. Customs authorities may accept the Council's recommendation or reject it with a reasoned explanation.

[Resolution of the Cabinet of Ministers No. 470 of 28 July 2025](#)

[Order of the Minister of Economy and Finance No. 3634 of 1 July 2025](#)

6. REGISTRATION OF INTELLECTUAL PROPERTY RIGHTS

The Cabinet of Ministers has adopted a Resolution establishing administrative rules for registering agreements on the transfer of IP rights as well as registering integrated circuit topologies, appellations of origin of goods, and the right to use such appellations.

Registration of IP rights transfer agreements is carried out by the Ministry of Justice (MoJ). Applications must be submitted electronically, either through the Unified Portal for Interactive Public Services or via the MoJ's electronic system, and are reviewed within 15 days. Amendments to relevant agreements must also be registered in the same manner.

Applications for the registration of integrated circuit topologies and appellations of origin of goods may be submitted electronically - either through the Unified Portal for Interactive Public Services or the MoJ's electronic system - or by post, in which case they will be uploaded into the MoJ's electronic system. The state examination of topologies must be completed within two months, while the examination of appellations of origin must be completed within 30 days.

[Resolution of the Cabinet of Ministers No. 427 of 10 July 2025](#)

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