



Uzbekistan Legal Newsletter

MAY 2026

UZBEKISTAN LEGAL NEWSLETTER: MAY 2026

May 2026 brought a broad range of legislative and regulatory reforms in Uzbekistan, with a particular focus on investment, environmental regulation and tax administration. Key developments included measures to expand private-sector participation in healthcare, new anti-corruption and competition review requirements for large investment projects, implementation of the new state environmental expertise regime, tighter environmental compliance obligations, reforms to land reclassification and tax administration, a special tax regime for foreign citizens, and Uzbekistan's accession to the Agreement on the New Development Bank.

1. ANTI-CORRUPTION AND COMPETITION REVIEWS FOR LARGE INVESTMENT PROJECTS

On 8 May 2026, the Anti-Corruption Agency and the Competition Promotion and Consumer Protection Committee adopted an Instruction introducing mandatory anti-corruption reviews and competition assessments for certain large investment projects. The Instruction applies to projects aimed at creating, expanding or modernising economically or socially significant facilities, services or infrastructure involving financial resources of at least USD 50 million. It covers projects financed from the state budget or state target funds, PPP projects, and projects involving foreign investment or international financial institutions where state guarantees, incentives, or other forms of state support are provided.

A project may not be approved or proceed to the next stage of implementation unless a positive anti-corruption review and competition assessment have been obtained. The anti-corruption review is conducted by the internal anti-corruption control unit of the state body or organisation preparing the project, while the competition assessment is carried out by its relevant antimonopoly compliance function. The project documentation, together with the prescribed anti-corruption and competition assessment checklists, must be submitted to those units for review. Both procedures apply throughout the project lifecycle, including during project development (before financing decisions are made or, in the case of PPP projects, relevant agreements are concluded), during procurement procedures for the selection of suppliers, contractors, investors or project partners, and during project implementation where project terms are materially amended, supplemental agreements are concluded or contract performance is monitored.

The anti-corruption review and competition assessment must generally be completed within 15 business days. The period for the competition assessment may be extended to 20 business days. Each procedure concludes with either a positive or negative opinion.

[Resolution of the Anti-Corruption Agency and the Competition Promotion and Consumer Protection Committee No. 3833 of 8 May 2026](#)

2. HEALTHCARE REFORM PACKAGE

On 5 May 2026, the President of Uzbekistan adopted Presidential Decree No. UP-74 and Presidential Resolution No. PP-170 introducing a broad package of reforms aimed at expanding private-sector participation in the healthcare sector. Key measures include:

- from 1 June 2026 to 1 June 2029, exemption from import customs duties for certain medical equipment, components, spare parts, consumables and specialised medical vehicles imported by medical organisations for their own needs in accordance with approved lists;
- from 1 July 2026 to 1 July 2029, a corporate income tax deduction for employers' voluntary medical insurance contributions of up to UZS 10 million per year in respect of each employee and each employee's family member;
- from 1 July 2026, limitation of medical licence suspensions to the specific medical speciality in which a breach occurs, rather than suspension of a medical organisation's activities as a whole;
- from 1 July 2026, reimbursement of treatment costs funded from the State Budget on the basis of unified tariffs applicable to both state and private healthcare providers. Patients may also be referred to private medical organisations for certain specialised outpatient services and surgical procedures financed through the State Medical Insurance Fund;
- from 1 July 2026, a gradual shift towards a treatment-based healthcare financing model. Instead of allocating funding primarily to individual hospitals and clinics, monthly funding volumes will be determined by reference to particular disease areas (such as cardiology, oncology or diabetes care) and directed to healthcare providers treating patients in those areas;
- from 1 September 2026, the assignment of additional responsibilities to the Agency for the Development of Medicine and the Pharmaceutical Industry in relation to attracting domestic and foreign investment and supporting the implementation of public-private partnership projects in the healthcare sector;
- by 1 April 2027, republican-level state medical institutions must obtain a medical licence; territorial-level institutions must do so by 31 December 2028 and district/city-level institutions by 31 December 2030. Previously, licensing requirements primarily applied to private medical organisations;
- from 1 April 2028, a prohibition on the State Medical Insurance Fund contracting with private medical organisations and republican-level state medical institutions that have not obtained national or international accreditation recognised by the International Society for Quality in Health Care (ISQua); and
- until 1 May 2029, application of a reduced 1% social tax rate to foreign doctors, managers, consultants and medical equipment technicians engaged by medical organisations.

[Presidential Decree No. UP-74 of 5 May 2026](#)

[Presidential Resolution No. PP-170 of 5 May 2026](#)

3. NEW PROCEDURE FOR STATE ENVIRONMENTAL EXPERTISE

On 11 May 2026, the Cabinet of Ministers adopted a Resolution implementing the Law "On Environmental Expertise, Environmental Impact Assessment and Strategic Environmental Assessment", which we covered in our [February 2025 newsletter](#). The Resolution, which will enter into force on 14 August 2026, establishes the procedure for conducting state environmental expertise and sets out the categories of activities and facilities for which it is mandatory. State

environmental expertise forms part of the project approval process and is generally carried out before a project may be financed or implemented. Key provisions include:

- the list of activities and facilities subject to mandatory state environmental expertise is set out in [Annex 1](#) to the Resolution;
- state environmental expertise is carried out by the State Environmental Expertise Centre under the National Committee for Ecology and Climate Change and its regional branches;
- applications for state environmental expertise must be submitted by project owners (initiators) through the Unified Interactive Public Services Portal, together with the required environmental documents;
- environmental documents must be prepared by a registered environmental documentation developer or by certified employees of the initiator;
- projects subject to mandatory state environmental expertise may not be financed by local commercial banks and other credit organisations or implemented unless a positive conclusion has been issued by the Centre. Where a negative conclusion is issued, the project must be revised and resubmitted for state environmental expertise or abandoned by the initiator;
- public hearings may be required before environmental impact assessment materials are accepted, particularly for projects involving significant environmental, health or location-related risks;
- state environmental expertise must be completed within 25 business days. For particularly complex projects, this period may be extended by up to three months; and
- a positive state environmental expertise conclusion remains valid for 3 years in respect of environmental impact assessment materials and for 5 years in respect of draft environmental standards.

[Resolution of the Cabinet of Ministers No. 234 of 11 May 2026](#)

4. TIGHTENING OF LIABILITY FOR ENVIRONMENTAL VIOLATIONS

On 4 May 2026, a Law strengthening liability for environmental and natural resource violations was adopted. Effective from 5 August 2026, it introduces financial sanctions on legal entities for violations identified during state environmental inspections. Depending on the violation, sanctions may amount to between 2 and 10 times the corresponding environmental damage or statutory compensation amount. Such sanctions may be imposed for, among other things:

- riverbed cleaning and riverbank reinforcement violations;
- water pollution and wastewater discharge violations;
- illegal felling, damage to or destruction of trees and shrubs, and failure to ensure their protection;
- exceeding permitted atmospheric emissions;
- breaches of air protection requirements at construction sites;

- breaches of air protection requirements in the burning of fuel, materials, substances or waste; and
- breaches of environmental requirements relating to waste management.

[Law No. ZRU-1143 of 4 May 2026](#)

5. STATE ENVIRONMENTAL MONITORING PROGRAMME FOR 2026–2030

On 25 May 2026, the Cabinet of Ministers adopted Resolution No. 275 approving the State Environmental Monitoring Programme for 2026–2030. The Programme replaces the previous environmental monitoring programme approved by Resolution No. 343 of the Cabinet of Ministers dated 3 June 2021, which covered the period until 2025. The Programme sets out a number of environmental monitoring measures involving business entities. In particular, among other things:

- operators of facilities classified within environmental impact categories I and II will be expected to install, at their own expense, automatic emissions monitoring systems at priority stationary emission sources, equip relevant facilities with dust and gas treatment equipment, and install automatic monitoring stations within sanitary protection zones;
- business entities whose activities affect water resources will be expected to install, at their own expense, high-efficiency local wastewater treatment facilities or modernise existing treatment facilities; and
- business entities operating facilities that may give rise to soil pollution, including sludge storage sites, raw material and waste dumps, industrial waste disposal facilities and municipal solid waste landfills, will participate in soil monitoring activities, including field surveys, soil sampling, laboratory analysis and contamination assessments. The Programme provides for part of the costs of these activities to be borne by the relevant business entities.

[Resolution of the Cabinet of Ministers No. 275 of 25 May 2026](#)

6. NEW PROCEDURE FOR RECLASSIFICATION OF AGRICULTURAL AND FOREST LAND

On 15 May 2026, the Cabinet of Ministers adopted Resolution No. 246 introducing measures to digitalise and streamline the procedure for reclassifying agricultural and forest land into other categories of the land fund, as well as the procedure for compensating agricultural and forestry production losses. The Resolution will enter into force on 1 July 2026.

The Resolution approves a new Regulation governing the electronic procedure for the reclassification of agricultural and forest land. Under the Regulation, proposals for reclassification are submitted through the “Digital Agriculture” Unified Integrated Platform by the Council of Ministers of the Republic of Karakalpakstan, regional khokimiyats and the Tashkent city khokimiyat, with the Ministry of Agriculture coordinating the process.

The Regulation sets out the electronic workflow for processing reclassification proposals, including their submission through the Unified Integrated Platform, the preparation and electronic circulation of conclusions by members of the Government Commission for Reviewing Matters Relating to the

Reclassification of Agricultural Land and Forest Land (established under Presidential Resolution No. PP-204 dated 12 April 2022), and the subsequent adoption by the Cabinet of Ministers of a decision on reclassification in accordance with the applicable legislation.

The Resolution also approves a new Regulation governing compensation for (i) losses incurred by landowners, landholders, land users and tenants, and (ii) agricultural and forestry production losses arising from the withdrawal of land from agricultural and forestry use.

[Resolution of the Cabinet of Ministers No. 246 of 15 May 2026](#)

7. TAX ADMINISTRATION REFORM PACKAGE

On 19 May 2026, the President of Uzbekistan adopted Presidential Decree No. DP-95 introducing measures to improve the operation of the tax authorities and modernise tax administration. The Decree approves a roadmap for the development of the tax administration system for 2026–2030 and introduces a number of measures aimed at simplifying tax compliance and expanding the use of digital tax administration. Among the commercially significant measures are the following:

- new criteria for classifying large taxpayers, effective from 1 July 2026. Two categories of large taxpayers are established: (i) taxpayers designated by virtue of their status or business activities (including banks, insurance companies, certain state-owned and strategic enterprises, participants in production sharing agreements and companies operating in the hydrocarbons, mining and electricity sectors, among others); and (ii) legal entities that pay at least 240,000 basic calculation values (currently approximately USD 8 million) annually in taxes and other mandatory payments and employ at least 100 employees, subject to certain sector-specific exclusions;
- loan (financial assistance) agreements between parties other than banks and other licensed credit institutions as well as warehouse storage agreements must be recorded with the tax authorities;
- land tax on agricultural land will be assessed on the basis of information provided directly to the tax authorities by the competent state authorities, eliminating the obligation for taxpayers to submit land tax returns in respect of such land;
- from 1 July 2026, (a) taxpayers will no longer be required to submit amended tax returns or supporting documents solely to explain discrepancies identified during the pre-audit analysis; (b) taxpayers classified as presenting a medium level of tax risk will first receive a notification identifying the relevant tax risks. If the identified deficiencies are remedied within 1 month, no tax audit will be conducted; and (c) newly established businesses may, at their option, use the services of Soliq Servis JSC free of charge during the 6 six months of their operations for the preparation and submission of tax and financial reports.

[Presidential Decree No. UP-95 of 19 May 2026](#)

8. SPECIAL TAX REGIME FOR FOREIGN CITIZENS

On 21 May 2026, the Cabinet of Ministers adopted a Resolution approving the Regulation on the procedure for granting a special tax regime to foreign citizens.

The special tax regime was introduced under Presidential Decree No. UP-180 dated 4 October 2025, which we covered in our [October 2025 newsletter](#). The regime provides eligible foreign citizens with an exemption from Uzbek personal income tax in respect of income derived from sources outside Uzbekistan, provided that they: (i) pay a special fee of USD 50,000; and (ii) open a bank account with an authorised commercial bank or a crypto wallet with an authorised crypto exchange in Uzbekistan. To obtain the special tax regime, a foreign citizen must submit an application together with a copy of their passport and a document confirming their lawful stay in Uzbekistan (for example, a visa). Applications may be submitted electronically through the Unified Interactive Public Services Portal or the Tax Committee’s website, or in person through Public Services Centres.

The special tax regime may be granted for the tax period specified in the application, subject to a maximum duration of 5 years.

[Resolution of the Cabinet of Ministers No. 270 of 21 May 2026](#)

9. UZBEKISTAN JOINS THE NEW DEVELOPMENT BANK

On 21 May 2026, the Law on the Accession of the Republic of Uzbekistan to the Agreement on the New Development Bank, signed in Fortaleza on 15 July 2014, was adopted.

Established by the BRICS countries, the New Development Bank provides financing for infrastructure and sustainable development projects across its member states.

Uzbekistan’s accession is expected to expand access to long-term financing for transport, energy and water infrastructure, as well as other large-scale infrastructure and green development projects.

[Law No. ZRU-1147 of 21 May 2026](#)

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