

COMPARATIVE ANALYSIS OF THE CONSTITUTIONS OF THE COUNTRIES OF CENTRAL ASIA

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ABSTRACT

The Constitution forms the legal basis of the country. It has the highest legal force and enshrines the rights, freedoms and duties of citizens. History clearly shows that the Constitution should not be amenable to change, as it is the core of society that ensures stability. Despite this, in today's information world, the Constitution should also be adapted to the requirements of the time. The Constitution should become the basis of reforms and the legal foundation of the Development Strategy of New Uzbekistan for 2022-2026

The purpose of this work is to conduct an in-depth analysis of the Constitutions of the countries of Central Asia in order to identify similarities and differences. The countries of Central Asia gained their independence in one year, after the collapse of the USSR, this moment is key and allows us to highlight the starting point where they started. It is interesting to study what these countries have come to over 30 years of independence in the field of constitutional law, what difficulties they have overcome; and how the experience of one country can help a neighboring one.

Methodology:

The study is based on the methods of induction and analysis. The author in this paper compares the Constitutions of the countries of Central Asia and the available factors, derives a generalization. There is a connection of the object of study. The mentality, culture and development of countries were studied, based on the synthesis method. The method of analysis was used to study the differences between the Constitutions of the countries of Central Asia.

Keywords: Amendments, Adaptation, Reforms, Development Strategy, Central Asia, Independence, Collapse of the USSR, Constitutional law, Comparative constitutional studies.

The Constitution is not a dogma, it is
Should be a program for action

Akmal Saidov

KAZAKHSTAN:

The culture and mentality of Kazakhstan was formed on three principles: primordially traditional, colonial and Western influence. The reason for this is that Kazakhstan is between European and Asian civilizations.

The economic development of Kazakhstan is explained by the fact that it is very rich in natural resources, for example, energy and mineral. According to the IMD-2021 rating, Kazakhstan ranked 35th in the competitiveness ranking. In this ranking, the efficiency of the government, business, as well as the infrastructure of Kazakhstan was highly appreciated. These statistics indicate its importance and development on the world stage.

The first Constitution of independent Kazakhstan was adopted at the IX session of the Supreme Council of Kazakhstan of the XII convocation on January 28, 1993. But this Constitution lasted only two years. This Constitution of Kazakhstan was adopted on August 30, 1995 by a nationwide referendum.

The Constitution of the Republic of Kazakhstan was written in two languages - Kazakh and Russian. The Kazakh version turned out to be longer than the Russian version in terms of the number of words due to the specifics of the translation of legal terminology and the peculiarities of the language.

During the adoption of this Constitution, more than 30 thousand collective discussions were held, where more than three million Kazakhstanis took part. After discussions, almost 30,000 proposals were submitted. In particular, more than 1,100 amendments and additions were made to fifty-five articles. Although the referendum on the adoption of the new Constitution took place on August 30, it entered into force only on September 5, 1995, after the publication of the official results of the will of the people in the newspapers Yegemen Yazaystan and Kazakhstanskaya Pravda.

Amendments and additions were made to the current Constitution four times - in 1998, 2007, 2011 and 2017. The first changes included changing the terms and powers of the President and deputies. The 2007 amendments provided that Kazakhstanis would no longer vote for a specific person, but for a specific party. In February 2011, the Constitution was amended regarding the basis for the appointment and election of the President of the country. At the same time, Nursultan Nazarbayev, the first President of Kazakhstan, received the status of "Elbasy".

And in 2017, part of the powers of the President were transferred to the Parliament and the Government.

As for the composition of the Constitution of Kazakhstan, it consists of 98 articles, which are grouped into 9 sections. In the preamble, Kazakhstanis recognize themselves as civil society.

Similarities with the Constitution of Uzbekistan:

1) The Constitution of Kazakhstan states that international treaties ratified in this country take precedence over its laws. This means that Kazakhstan recognizes the international treaties that it has signed above its normative acts. This is also observed in our law. For example, the preamble to the Constitution of the Republic of Uzbekistan states that the Constitution was created recognizing the priority of universally recognized norms of international law

2) Similarities are also observed in the rules governing family relations. For example, paragraph 3 of Article 23 tells us that adult able-bodied children are obliged to take care of disabled parents. In the Constitution of Uzbekistan, such a provision is provided for in Article 66 of the Constitution of the Republic of Uzbekistan. This rule at the constitutional level consolidates our traditions regarding respect and care for the older generation.

Differences with the Constitution of Uzbekistan:

1) In paragraph 1 of Art. 2 The Republic of Kazakhstan (hereinafter RK) states that Kazakhstan is a unitary state with a presidential form of government. As for Uzbekistan, we do not have an article that would clearly indicate the structure of the state. For example, Uzbekistan is considered a unitary state with signs of a federation, but the opinions of scientists differ on this point, because of this, the territorial structure of Uzbekistan should be precisely determined. But according to the form of government, Uzbekistan is also presidential.

2) clause 3.1. Art. 2 says that within the city of Nursultan a special legal regime can be established in the financial and legal spheres. To implement this article, the constitutional law “On the Astana International Financial Center” was adopted. This NLA states that there is an international financial center in the city of Nur-Sultan, which enjoys special prestige. For example, according to Art. 4 of the law “On the Astana International Financial Center”, in the city of Nur-Sultan, along with local laws, there are norms, precedents of the law of England and Wales, because they are considered the standards of the world's leading financial centers. Another reason for the introduction of the Anglo-Saxon legal system is the creation of favorable conditions for foreign investors. Also, according to Art. 6 of this NPA, the Participants of the Center until January 1, 2066 are exempt from paying corporate income tax. This center is also distinguished by the fact that it has its own management, for

example, the Council for the Management of the Center, the court of the center, the international arbitration center. If we consider in more detail the court of this center, then it has a special legal status and resolves issues that have arisen only in this center. It has only 2 instances - first and appeal. The official language of the center is English. This was done to attract investors and turn the city of Nur-Sultan into an international financial center.

3) paragraph 3 of Art. 6 tells us that the Earth, its subsoil, water, flora and fauna, and other natural resources are state property. Land may also be privately owned.

4) In paragraph 3 of Art. 10 states that Kazakhstan does not recognize the citizenship of another state.

5) Art. 15 paragraph 2 allows for the possibility of the death penalty. It is established by law as an exceptional measure of punishment for terrorist crimes accompanied by the death of people, as well as for especially grave crimes committed in wartime.

6) According to paragraph 2 of Art. 41, A citizen of Kazakhstan by birth, not younger than forty years old, fluent in the state language, living in Kazakhstan for the last fifteen years and having a higher education may be elected President of the Republic of Kazakhstan.

7) In paragraph 5 of Art. 42 states that the same person cannot be elected President of the Republic more than twice in a row, but this restriction does not apply to the First President of the Republic of Kazakhstan, Nursultan Nazarbayev.

8) In paragraph 1 of Art. 70 provides the right of ex-Presidents of Kazakhstan to become life members of the Constitutional Council. And in Uzbekistan, the ex-President can only become a life member of the Senate.

9) In paragraph 2 of Art. 91 provides the invariable provisions of the Constitution of Kazakhstan. Examples of them: unitarity and territorial integrity, the form of government, as well as the fundamental principles of the country's activities, laid down by the Founder of independent Kazakhstan, the First President of the Republic of Kazakhstan - Elbasy.

10) In paragraph 1 of Art. 95 states that one half of the deputies of the Senate is elected for 4 years, while the other half of the deputies - for a term of two years.

Proposals to the Constitution of Uzbekistan:

1) Clause 1 of Article 1 can be adopted from the Constitution of Kazakhstan. It talks about the fundamental principles of Kazakhstan's activities, namely: public harmony and political stability, economic

development, patriotism, the solution of the most important issues of public life at a republican referendum or in Parliament.

2) In paragraph 2 of Art. 7 shows that the Russian language has an official status, because of this it is used in state organizations and local governments on a par with Kazakh.

3) In paragraph 2 of Art. 19 states that everyone can use their native language and culture, can freely choose the language of communication, education, training and creativity.

4) In paragraph 2 of Art. 75 states that in some cases criminal trials are carried out with the participation of jurors

5) paragraph 3 of Art. 77 states that laws that worsen the situation of citizens, establish or increase responsibility, impose new duties do not have retroactive effect. But if, after the commission of the offense, a law was passed that mitigates or cancels liability, then a new law applies;

6) paragraph 3 of Art. 77 leads that the clergy should not testify against those who trusted them in confession. Evidence obtained illegally is not valid. No one can be condemned on the basis of his own confession alone;

TURKMENISTAN:

The culture and mentality of Turkmenistan is slightly different from other Central Asian countries. this is explained by the fact that the ancestors of the Turkmens are nomads, while the ancestors of the Uzbeks or Tajiks were sedentary. In the mentality of Turkmens, love for horses is strongly manifested. For Turkmens, a horse is a symbol of the country. It is customary to see photographs of horses in their homes, instead of family members.

Another difference of the Turkmen society is hierarchy. The order of older people must be executed immediately and without hesitation. For Turkmens, fur hats are the dignity of men. You can not tear it off the head of the owner. This is considered an insult.

The economy of Turkmenistan is distinguished by the sale and sale of a large amount of natural resources. Investors are only allowed to extract complex deposits of natural resources. The main gas exporter of Turkmenistan is Russia, because through its pipelines Turkmen gas reaches the European market.

In 2018, Turkmenistan entered the TOP-3 in terms of economic growth. And in terms of natural gas reserves, it ranks 4th in the world, and 10th in terms of production. Export of Turkmenistan is 2.2 times more than import. The main sectors of the economy are oil and gas production, agriculture, and metallurgy.

bicameral. The bicameral parliament began to function from January 1, 2021. The Mejlis, which had previously been a unicameral parliament, became the lower house, and the Halk Maslakhaty, which previously existed as a body separate from the Mejlis, became the upper house. It should be noted that in Uzbekistan the parliament became bicameral in 2005.

In the constitutional reform of 2020, the concept of an ex-president was introduced, who automatically receives a seat in the Halk Maslakhaty.

Similarities with the Constitution of Uzbekistan:

- Article 17 provides for political diversity and a multi-party system.
- According to Art. 71. The President of Turkmenistan is the supreme commander in chief.

Differences with the Constitution of Uzbekistan:

- Art. 10 tells us that a citizen of Turkmenistan is not recognized as a citizen of another state. This means that dual citizenship is prohibited in Turkmenistan. It is also said that a citizen of Turkmenistan cannot be extradited to another state, expelled from Turkmenistan or limited in the right to return to his homeland.
- Art. 11 guarantees the rights and freedoms of foreign citizens and stateless persons.
- According to Article 76, in Turkmenistan, the President may transfer some of his powers related to foreign policy, awarding. pardon and amnesty.
- According to Art. 91 In Turkmenistan, the head of the executive branch is the President, while in Uzbekistan this position is occupied by the Prime Minister.

Proposals to the Constitution of Uzbekistan:

- The Constitution of Turkmenistan already in the preamble guarantees the rights and freedoms of man and citizen, and also affirms the principle of permanent neutrality.
- Art. 2 states that the Resolutions of the UN General Assembly on the "Permanent Neutrality of Turkmenistan" were adopted. It also states that the permanent neutrality of Turkmenistan is the basis of its domestic and foreign policy.
- Art. 32 states that the death penalty has been abolished in Turkmenistan. Here, at the constitutional level, the people fix that they are against the death penalty.
- Turkmenistan has a separate Article 40 regulating family relations. This article establishes the right to form a family, the equality of spouses, the rights and obligations of parents in raising their children.

- Article 46 establishes equal opportunities for citizens to access public service and the right to participate in the administration of justice.
- Art. 62 speaks of the admissibility of evidence. It says here that evidence obtained in violation of the law is null and void. It also establishes the right of citizens not to testify against themselves or their relatives..
- Art. 63 states that laws that worsen the situation of a citizen do not have retroactive effect..
- According to Art. 71, the President of Turkmenistan does not have the right of suspensive veto in relation to constitutional laws on the adoption of the Constitution, amendments and additions to it.
- According to Art. 141, in Turkmenistan it is impossible to change the form of government, i. it must always remain presidential.

KYRGYZSTAN:

Kyrgyzstan is a country where 65% of the territory is occupied by mountains. Kyrgyzstan is rich in natural resources, which are necessary for the development of agriculture and hydropower.

Today, Kyrgyzstan has found its place on the world stage. It is important to note that 115 countries recognize Kyrgyzstan and it has established diplomatic relations with almost 100 countries. In international relations, Kyrgyzstan achieves significant success, for example, in 2021 it ranked 93rd in the world in terms of military power. Also, the gross national income in Kyrgyzstan in 2021 reached \$1,240 and ranked 169th in the world.

The Constitution of Kyrgyzstan was adopted on May 5, 1993 at the 12th session of the Supreme Council of Kyrgyzstan. Then the Constitution consisted of 8 chapters and 97 articles. The first five amendments were made during the presidency of Askar Akayev, in 1994, 1996, 1998, 2001 and 2003. On February 10, 1996, on the basis of a referendum, a bicameral parliament, the Jogorku Kenesh, was formed, consisting of the Legislative Assembly and the People's Assembly. On October 17, 1998, private ownership of land was introduced. On December 24, 2001, the Russian language was given the status of an official language. On February 2, 2003, a new version of the Constitution was adopted. In 2006, Kyrgyzstan adopted a new Constitution, but the Constitutional Court did not recognize it and canceled it. As a result, in 2007 a referendum was held, which resulted in the following: the parliament began to be elected according to the proportional system, the President received greater rights to dismiss the government and civil servants. They also established a rule that the same candidate cannot become President twice in a row. In 2010, they adopted a new version of

the Constitution, where they imposed a ban on amendments until 2020. But still, in 2016, amendments were made to the basic law, according to which the rights of the President were limited, while the heads of government, on the contrary, were expanded.

The last amendments were made on May 5, 2021 and they became the eighty-first in a row. According to the results of the 2021 referendum, the President began to replace the Prime Minister and began to lead the executive branch. Complicated the impeachment process. The number of parliament deputies was reduced from 120 to 90. A new advisory, supervisory body, the People's Kurultai, was created, which gives directions on social development. This body is mentioned in Article 7 of the Constitution of Kyrgyzstan. The Constitutional Court was created instead of the Constitutional Chamber.

The Constitution of Kyrgyzstan consists of 5 sections, 14 chapters and 116 articles.

Similarities with the Constitution of Uzbekistan:

- Article 11 states that Kyrgyzstan does not have aggressive and military goals. In Kyrgyzstan, it is forbidden to use the armed forces to solve internal political problems.
- According to article 20, respect and care for parents is considered a sacred duty of children. Children, in turn, are the most important value of Kyrgyzstan. Also in article 21 there is a mention of their sacred tradition, to honor the elders and respect the younger.

Differences with the Constitution of Uzbekistan:

- In the preamble there is a mention of the epic of the Kyrgyz people "Manas". This work is included in the UNESCO Intangible Cultural Heritage List, as well as in the Guinness Book of Records as the largest epic in the world. The Kyrgyz revere and follow the precepts of Manas the Magnanimous, the protagonist of this epic.
- Article 1 states that Kyrgyzstan is an independent, sovereign democratic, unitary, legal, secular and social state. While the Constitution of Uzbekistan states only that Uzbekistan is a sovereign democratic republic.
- The Constitution itself, in Article 23, states that human rights and freedoms can be limited to protect national security, public order and in wartime.
- Article 29 states that no one may be prosecuted for disseminating information that discredits or degrades the honor and dignity of a person.
- Article 73 states that the President can be prosecuted after being removed from power for violating the Constitution and



for interfering in the affairs of the Jogorku Kenesh, as well as the court.

- Article 85 of the Constitution establishes that the legislative initiative belongs to 10,000 voters as a people's initiative and they are mentioned in the same row as such subjects as the President and the Prosecutor General.

- Article 92 states that the resignation of the Chairman of the Cabinet of Ministers does not entail the resignation of the entire Cabinet of Ministers. And in the Constitution of Uzbekistan, Article 98 states that in the event of dismissal of the Prime Minister, the entire Cabinet of Ministers resigns.

Proposals to the Constitution of Uzbekistan:

- Article 5, paragraph 2 states that the usurpation of power, that is, its seizure, is a particularly serious crime.

- According to Article 13, the Russian language also enjoys the status of an official language.

- Article 25 clearly states that the death penalty is prohibited.

- The Kyrgyz Republic has established the principle of ensuring the best interests of the child, which is included in Article 27 of the Constitution. This principle is established in accordance with the Convention on the Rights of the Child. For example, this principle states that due consideration should be given to the views of the child. We must ensure the survival and healthy development of the child to the maximum extent possible.

- The ban on forced labor, exploitation of child labor, human trafficking and slavery is approved at the constitutional level and is included in Article 28 of the Constitution.

- Article 42 of the Constitution establishes the right of citizens to strike. This right comes from the International Covenant on Economic, Social and Cultural Rights, and Kyrgyzstan acceded to it on January 12, 1994

- Paragraph 2 of Article 51 allowed dual citizenship. A citizen of Kyrgyzstan who has acquired citizenship of another country receives the status of a compatriot with foreign citizenship. He is granted the right to visa-free entry and exit to his homeland, employment without a permit, temporary residence and education, it will be possible to use the services of medical institutions, and such a person is issued a Meken Card for 10 years.

- Paragraph 5, Article 59 refers to the provisions of the Miranda Act. It says that the detainee must be told the reasons for his detention, as well as explain his rights.

- Article 60 establishes that a law that aggravates a person's liability does not have retroactive effect. It is also

mentioned here that the criminal law by analogy does not apply, because the analogy of the criminal law contradicts the requirements of the principle of legality, allowing derogation from it in practice. Such a norm is also established in the Constitution of Kazakhstan.

- According to Article 115, citizens are allowed to establish aksakal courts. They specialize in handling cases to reconcile the parties.

TAJIKISTAN:

Tajikistan is one of the states with a developed culture and mentality. The Tajik mentality is characterized by humanism and collectivism. Tajiks are distinguished by hospitality and tolerance, expressed by the requirements of the Islamic religion, which educates a person in a spirit of respect for the opinions and positions of others. The culture and traditions of the Tajik people are also manifested in lawmaking, examples of which are such laws as “On the regulation of traditions and customs”, “On the responsibility of parents for raising children”. They are aimed at protecting the traditions and customs of the Tajik people.

When we consider the economy of Tajikistan, it should be noted that 93% of the country's territory is in the mountains. Because of this factor, Tajikistan is rich in mineral resources, more than 400 deposits have been explored, about 100 of them are being exploited, 40 types of minerals are mined. The economy is based on industry and agriculture. Tajikistan's external debt is decreasing, due to the fact that the country's gold reserves increased 60 times over 15 years from 2000 to 2015.

Tajikistan has an important place in the international arena, it has been recognized by 151 countries, the country has established diplomatic relations with 126 of them, has become a member of 51 organizations. The experience of the Tajik people in establishing peace and national accord, gained as a result of the civil war, is recognized by the world community. Tajikistan has an open door policy.

In terms of development, Tajikistan has made progress in reducing poverty and developing the economy. Between 2009 and 2019, the poverty rate fell from 83% to 26.3% of the population, and economic growth averaged 7% per year. Thanks to the national development strategy for the period up to 2030, adopted in Tajikistan, it is planned to increase the income of the population by 3.5 times by 2030 and reduce the level of poverty by half. Tajik President Emomali Rakhion noted that the share of the private sector in the economy was 70% of GDP. Tajikistan has established diplomatic relations with 160 states and has become a member of 51 international organizations. The Constitution of Tajikistan is not divided into sections, consists of 10 chapters and 100 articles, as well as a transitional provision. It was adopted by referendum on November 6, 1994.

At that time, a civil war was taking place in Tajikistan. The draft Constitution was created by two commissions. The first draft of the Constitution was published for discussion in April 1992, in the newspaper "Jumhuriyat". This project was prepared by the second working group under the leadership of Nurullo Khuvaidulloev, who at that time held the position of the Prosecutor General. In 1993, work continued on the creation of the Constitution. Two versions of the Constitution were drawn up - one for the Presidential Republic, and the other for the Parliamentary Republic. It is worth noting the participation of the people in the creation of the Constitution. As a result of the discussion of the draft Constitution, more than 7 thousand proposals were received from the people.

The Constitution of Tajikistan has undergone a number of changes. For example, since independence, 3 amendments have been made to the Constitution of Tajikistan, in 1999, 2003 and 2016. The result of the referendum in 1999 was the permission to register religious political parties. This was a condition of the peace agreement and ended the 1992–1997 civil war in Tajikistan. The term of office of the President was also extended to 7 years, but in one term. A significant result of the 1999 referendum is the creation of a bicameral Parliament, the Majlisi Oli. Now the Parliament of Tajikistan consists of the chambers of the Majlisi Milli and the Majlisi Namoyandagon. At the 2003 referendum, 56 amendments were considered, the main among them is the extension of the Presidential term for 7 years, but already for two terms.

In the 2016 referendum, the people were limited in their choice. An example is that people could only answer “yes” or “no” and voted on all 50 amendments at once. This referendum considered the possibility of Emomali Rahmon being re-elected an unlimited number of times. They also reduced the age limit for a presidential candidate from 35 to 30 years. They introduced a ban on the creation of parties of a religious and atheistic nature.

Similarities to the Constitution of Uzbekistan:

- Tajikistan is another Central Asian country with an autonomous territory. The country consists of the Gorno-Badakhshan Autonomous Oblast and other regions, according to Article 7.
- According to Article 49, every ex-President of Tajikistan becomes a member of the Majlisi Milli for life, unless he renounces this right.
- Article 53 tells us that the representative of the Gorno-Badakhshan Autonomous Region is one of the Deputy Chairmen of the Majlisi Milli.

- In accordance with Article 78, Tajikistan has a self-government body in the township and village, which is called Jamoat.

Differences with the Constitution of Uzbekistan:

- Dual citizenship is not allowed in Tajikistan, as Article 15 of the Constitution states that citizens of Tajikistan cannot be citizens of another state.
- According to Article 64, the President of Tajikistan is both the head of state and the head of the executive branch.
- Article 65 observes the possibility for the Leader of the Nation, Emomali Rahmon, to run for President more than twice in a row, but at that time it is generally prohibited.

Proposals to the Constitution of Uzbekistan:

- Article 1 of the Constitution of Tajikistan states that Tajikistan is a social state that creates conditions that ensure a decent life and free development of a person.
- Article 2 establishes the status of the Russian language as the language of interethnic communication.
- Article 11 establishes that Tajikistan can be a member of commonwealths, international organizations, and also cooperates with foreign compatriots.
- Article 46 clearly spells out the conditions for declaring a state of emergency. According to this article, a state of emergency is declared when there is a threat to human rights, the independence of the country and its territorial integrity, as well as due to disasters. It is established that the state of emergency is 3 months and then it can be extended.
- In accordance with Article 51, a free deputy mandate is established in Tajikistan. For example, a member of the Majlisi Milli and a deputy of the Majlisi Namoyandagon does not depend on the will of the voters, can freely express his opinion and vote according to his conviction.
- Article 100 of the Constitution establishes constitutional norms that are not subject to change. This is a republican form of government, territorial integrity, as well as the democratic, legal, secular and social essence of the state.

Conclusion:

Based on the foregoing, we can conclude that the Constitutions of the countries of Central Asia have much in common, but at the same time, there are differences.

Some constitutional norms can be introduced into the Constitution of Uzbekistan to improve it. Examples of such norms are: based on the experience of Kazakhstan, it is possible to introduce a special financial and legal position in the capital to turn it into an

international business center, which will help attract foreign capital. It is possible to give the Russian language the status of an international or official language. Having studied the experience of Turkmenistan, it is possible to apply the principle of permanent neutrality. It is possible to adopt the experience of Kyrgyzstan in implementing the principle of ensuring the best interests of the child. On the basis of the international pact on economic, social and cultural rights, the right to strike can be introduced into the Constitution. On the example of Kyrgyzstan, some norms from the Miranda law can be introduced. In order for the Constitution to be the pillar of society and the foundation of development, it must meet the requirements of the time and change. This can be confirmed by the words of **Winston Churchill that “To become better means to change, to be the best of the best means to change constantly.”**

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