

25 February 2025

KYRGYZSTAN: Religious freedom survey, February 2025

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Freedom of religion and belief and interlinked human rights are under increasing threat in Kyrgyzstan. Forum 18's survey analysis documents: a 2025 Religion Law which among many other violations continues to ban exercise of freedom of religion or belief without state permission and denies communities without 500 adults from being allowed to exist; arbitrary refusals to grant registration to communities seeking state permission to exist; jailing and fining critics of the regime's freedom of religion or belief violations; and failures to bring the perpetrators of violent attacks to justice.

Freedom of religion and belief (FoRB) and related human rights issues in Kyrgyzstan include but are not limited to: state control and repression of the majority Islamic community; a 2025 Religion Law which among many other violations continues to ban exercise of freedom of religion or belief with others without state permission and denies communities without 500 adult citizens from being allowed to exist; jailing and fining critics of the regime's freedom of religion or belief violations; failures to bring the perpetrators of violent attacks to justice; the continued banning of the Ahmadi Muslim community, and continued arbitrary refusals to grant registration to communities seeking state permission to exist; regime denials that legally-binding international obligations are legally-binding; and raids on religious communities.

Context

Kyrgyzstan has the fourth largest surface area of the five Central Asia countries. Regime statistics indicate that it has around 7 million people, the fourth largest population of the five countries. They also state that over 70 per cent of the population are ethnic Kyrgyz and around 15 per cent ethnic Uzbeks (popularly regarded as being of mostly Sunni Muslim background), with significantly smaller percentages of Russians (popularly regarded as being of Russian Orthodox or other Christian background) and other ethnicities. Around three per cent of the population are thought to be of other religious backgrounds.

Violations of interlinked human rights such as freedom of expression and freedom of religion and belief (<https://www.forum18.org/archive.php?country=30>) have increased in recent years, as documented by human rights defenders such as Kylym Shamy (<https://www.ksh.kg/>) and Human Rights Watch (<https://www.hrw.org/europe/central-asia/kyrgyzstan>). In December 2024, Human Rights Watch described the regime as "relentless in its crackdown on civil and political rights" (<https://www.hrw.org/news/2024/12/10/kyrgyzstan-relentless-its-crackdown-civil-and-political-rights>).

Repression of the majority Islamic community

The regime-controlled Muslim Board (Muftiate) controls all public expressions of Islam. Such controls on Muslims exercising freedom of religion or belief can be highly repressive. In July and August 2023 the National Security Committee (NSC) secret police closed 39 mosques and 21 religious schools in Osh Region using excuses such as allegedly not having official registration and violating sanitary norms. The raid was part of a nationwide pattern of raids on mosques and madrassahs followed by forced closures for varying periods of time.

The regime appears to have also targeted other religious communities in the context of its increasing repression of any exercise of human rights, including Catholic, Protestant, and Hare Krishna communities.

Janybek Dosmambetov, Deputy Prosecutor of Kara-Suu District, told Forum 18 that Osh Prosecutor's Office ordered raids on and closures of mosques and madrassahs in the region as: "Some of them violated sanitary norms, did not have registration, and violated other legal norms."

In one example, on 21 July 2023 officials raided and closed Kara-Suu District's Al-Sarakhsi Mosque. The officials were from the NSC secret police, the Interior Ministry, the Regional and District Police, the Emergency Situations Ministry, the State Sanitary and Epidemiological Service, Kara-Suu District Architecture Department, Kara-Suu District Land Cadastre, the State Commission for Religious Affairs (SCRA), and the state-controlled Muslim Board including its Osh District representative (qazi).

Some mosques and madrassahs, though not Al-Sarakhsi Mosque, are still closed. One day later the mosque was suddenly reopened

after a video protest (see below). Regime officials denied this protest was the reason, but could not explain why they reopened the mosque.

Jailing regime critics

The regime of Sadyr Japarov targets people who publicly criticise its policies and actions. Three Muslim men (Asadullo Madraimov, Mamirjan Tashmatov, and Mahamatayubhon Mashrapov, all members of the Al-Sarakhsi Mosque community) posted a video online on 27 July 2023 protesting against the closures. They observed that the mosque "was not closed even in Soviet times, and there is no excuse for its closure". The video dismissed as "absurd" the regime's claim that the mosque had no running water, noting that Muslims can on religious grounds use dust for the cleansing ritual if water is not available.

Police arrested Madraimov, Tashmatov, and Mashrapov after their protest, and they were questioned, required to write a written statement, and then released. The regime then began to prepare criminal cases against them. On 18 August 2023, Justice Ministry "experts" Shekerbek Berdibek uuly and Almaz Kulmatov produced an "expert analysis" (which Forum 18 has seen). The "expert analysis" states that the video discredited the authorities' actions by saying that "law-enforcement agencies interfered in mosque matters and acted against Muslims".

Kulmatov of the Judicial Expert Analysis Centre refused in March 2024 to explain to Forum 18 why he and his colleagues' "expert analysis" of Madraimov's comments described them as "extremist". When Forum 18 asked what, for example, was "extremist" in Madraimov's factual comment that "even during Communist times the Al-Sarakhsi Mosque was not closed", Kulmatov would not explain his claim.

Police Senior Lieutenant Edilbek Japarov claimed to Forum 18 that the video was made for "illegal dissemination" and "constitutes inciting religious hatred". He refused to explain why he made these claims, even when Forum 18 pointed out that the Justice Ministry "expert analysis" does not specify who the alleged "hatred" was incited against. He also refused to explain why criticising the regime – which is not a religious group – is "illegal" and is "inciting religious hatred".

Colonel Urmatbek Jumabekov, head of the Interior Ministry's "Department for the Struggle against Extremism and Illegal Migration", also refused to explain to Forum 18 why the criminal cases were opened against Madraimov, Tashmatov, and Mashrapov.

Deputy Prosecutor Dosmambetov claimed to Forum 18 that the three Muslims were arrested and detained as "they are extremists". When Forum 18 asked what exactly the "extremism" was, he replied: "You do not know the details of the case, and I will not tell you."

On 18 October 2023, Madraimov, Tashmatov, and Mashrapov were arrested. On 26 February 2024, prisoners of conscience Madraimov and Tashmatov were jailed for three years and two years respectively. In a separate hearing in January 2024 the third protestor, Mahamatayubhon Mashrapov, was fined 100,000 Soms (about five months' average wage for those in formal work).

On 13 May 2024, the jail sentences were halved on appeal and Tashmatov was freed in the court room as he had served his full sentence. However, on 28 October the Supreme Court restored the three-year jail term for 36-year-old Muslim prisoner of conscience Madraimov.

In another example of targeting people who publicly protest against the regime, in August 2022 a Protestant, Aytbek Tynaliyev, who on social media commented on religious topics and on the President was fined the equivalent to eight months' average wage. In July 2023, a court in the northern Chuy Region jailed him for six months for "inciting religious enmity" for social media posts sharing his faith and questioning the regime's religious policy.

"I was critical of the 2022 Presidential Decree where slaughtering of many cows and lambs during funerals or other religious ceremonies was not recommended," Tynaliyev explained to Forum 18. "And therefore knowing that in Islam they pray for the dead from the Koran, and wondering why those who come to the funeral can pray for the dead person but the authorities think that it is not normal to eat a good meal at the funeral, I asked the question. Why must the authorities regulate our faith, our traditions?"

Neither Prosecutor Kaliya Rysbek kyzy, nor the two Justice Ministry religious "experts", who supported the prosecution case against Tynaliyev in court, would explain to Forum 18 why the prosecution was brought.

Violence and regime collusion

Violent attacks against non-Muslims in regions outside the capital Bishkek have continued, local Protestants have told Forum 18. The treatment of the perpetrators of violent attacks on people and communities exercising their freedom of religion and belief is in stark contrast to the regime's swift arrests and jailings of critics of its actions.

Officials have repeatedly refused to explain to Forum 18 why perpetrators are not prosecuted and punished, and what is being done

to stop such attacks. When such attacks happen, Protestants stated, "local believers are afraid to complain to the authorities" as "they are afraid of reprisals from the authorities and local mobs for complaining".

These attacks include "concrete threats by mobs in regions nationwide to forcibly convert ethnic Kyrgyz Christians to Islam", a Protestant who wished to remain anonymous for fear of state reprisals stated. In one such case, a mob threatened ethnic Kyrgyz Christians that they would be driven out of their homes if they did not convert to Islam. Protestants told Forum 18 that the local authorities "calmed down the mob members and made the two sides make peace", but officials brought no prosecutions against the perpetrators.

Zamir Tursunbekov of the Presidential Administration, who is responsible for religious affairs, and Kanatbek Midin uuly, Deputy Director of the State Commission for Religious Affairs (SCRA), both refused to explain to Forum 18 why the regime does not punish the perpetrators of violent attacks on non-Muslims.

Smaller vulnerable communities often experience problems in carrying out burials in their own way, and in accordance with the wishes of relatives and the deceased. Relatives and friends who want to bury their dead with non-Muslim rites are frequently afraid to publicly discuss such problems, for fear of reprisals and mob violence aided by regime officials' lack of willingness to defend people's human rights. Some non-Muslims have been forced to convert to Islam to bury their dead. In other cases, state-appointed Muslim clergy and state officials have prevented non-Muslim families from burying their dead in local authority-controlled cemeteries.

Repressive 2025 Religion Law and Amending Law

A 2025 Religion Law replaced the 2008 Religion Law and subsequent amendments. An associated new Amending Law in the Area of Religion changes the 2021 Violations Code, the Political Parties Law, the Laws on Elections of and Status of Deputies of Local Keneshes [administrations], and the Law on Status of Deputies of the Zhogorku Kenesh. The 2025 Religion Law came into force on 1 February 2025, and the Amending Law days later. The regime published the text of the new laws only as they went into force.

Both drafts were prepared at the regime's initiative by the State Commission for Religious Affairs (SCRA), the National Security Committee (NSC) secret police, and the Interior Ministry. Religious communities, who also wished to remain anonymous for fear of state reprisals, told Forum 18 that neither the SCRA nor other regime officials had informed or consulted them on the proposed new Laws.

The justification for the then draft Religion Law – signed by SCRA Chair Azamat Yusupov - claims that its objective "is to improve the legislative framework, fulfil the international obligations of the Kyrgyz Republic, and ensure continuity and consistency of state policy in the religious sphere". He also falsely claimed that adopting the 2025 Religion Law would have "no negative social, economic, legal, human rights, gender, ecological, or corruption consequences".

The Religion Law seriously violates Kyrgyzstan's legally binding international human rights obligations, such as those outlined in the OSCE / Council of Europe Venice Commission Guidelines on the Legal Personality of Religious or Belief Communities (<https://www.osce.org/files/f/documents/9/9/139046.pdf>), and the OSCE's Freedom of Religion or Belief and Security: Policy Guidance (<https://www.osce.org/files/f/documents/e/2/429389.pdf>).

The new Amending Law's changes to the Violations Code increase the punishable scope of the exercise of freedom of religion or belief, and sharply increase fines.

A Foreign Agents Law signed into law in April 2024 does not ostensibly apply to religious organisations, but members of some religious communities expressed their fears. "The government can twist any law to use against us arbitrarily," one told Forum 18.

"Illegal" exercise of freedom of religion or belief

Article 8, Part 3 of the 2025 Religion Law continues to make the unregistered exercise of freedom of religion or belief illegal and punishable, specifying that the exercise of this freedom without SCRA registration is illegal and punishable under the Violations Code.

Religion Law Article 24 specifies that the activity of registered religious organisations "is forcibly terminated by court decision in cases of the systematic violations of the norms of the Constitution, this Law or other Laws or in cases of the systematic carrying out of activity contradicting the aims in the Statute". Such a decision makes any activity by the liquidated religious community illegal and punishable.

The Amending Law's changes to the Violations Code rewords the provision in Violations Code Article 142 to punish those who exercise freedom of religion or belief or use a place of worship without state permission with a fine of 200 Financial Indicators (FIs) on individuals (20,000 Soms, equivalent to three weeks' average wage) and 650 FIs on organisations. The Violations Code allows the police and the SCRA to issue summary fines for violating Article 142.

"Impossibly high" registration requirements

Article 9 of the 2025 Religion Law specifies two forms of legal religious organisations:

- local religious organisations, which can function only in the administrative territory where they are registered, and require at least 500 adult citizen founders living in a single Region of the country. (The 2008 Religion Law required 200 adult founders living anywhere in the country.);
- and central spiritual administrations.

Under Article 23, those with criminal records are not allowed to act as a founder or religious community leader.

Many smaller religious communities of a range of beliefs have not sought state registration as they are, as one told Forum 18 in July 2023, "afraid of state reprisals for themselves as communities as well as their members". They fear that if regime agencies are given – as is required – the personal details of founders this will lead to state surveillance of their private lives, and possible later targeting by regime agencies.

"Many people will not want to identify themselves to the regime as founders of a religious community," a human rights defender, who wished to remain anonymous for fear of state reprisals, told Forum 18 in December 2024. "Setting the impossibly high threshold of 500 signatory founders living in the same district will seriously limit the number of religious communities, and denies the reality that we are a multi-confessional society."

The human rights defender added: "Many religious communities will not be able to collect the 500 signatures, and will run into trouble with the authorities for exercising their constitutional right to freedom of religion or belief without state permission." They observed that, as a result, "members of communities will not be able to meet to read religious texts or pray and worship together. They also will not be able carry out charitable or other activities."

Various smaller religious communities, who all wished to remain anonymous for fear of state reprisals, told Forum 18 in December 2024 that "it is obvious that the draft Law is aiming to push various smaller religious communities into unions of so-called 'central spiritual administrations', which will make it easier for the regime to control individual religious communities and their clergy".

Article 9, Part 5 of the 2025 Religion Law requires all the founders of any religious organisation to be personally present at a meeting that formally founds the organisation and chooses its leadership. All participants have to vote unanimously to found the organisation. A simple majority of votes is required to choose the leaders. It remains unclear what would prevent an individual who did not want a specific religious organisation to exist – for example a regime official - from attending a founding meeting, and voting against its founding.

Under Article 9, Part 10, a religious community's application requires a full list of all the founders. It appears that would have to list their full names and passport details. This list has to be legally notarised.

It appears that when - for example - a local religious community gathers 500 adult citizens living locally, and they unanimously agree to found a religious organisation, and submit an application and associated documentation. If the SCRA thinks that any of the 500 is ineligible, the local religious community's application is to be rejected. The religious community would then have to start the whole procedure again by calling a new founders' meeting and preparing a new application.

Article 21, Part 4 allows the religious community to appeal against a SCRA rejection after the application and associated documents have been returned to the community. The appeal must be made in accordance with the law on administrative procedures.

Under Article 9, Part 10, religious communities applying for registration have to include with their application a document with "information about the basics of the doctrine and the practice corresponding to it, including the history of its origin, the forms and methods of its activities, the attitude towards family and marriage, education, the peculiarities of the attitude towards the health of followers of the given religion, and restrictions for members and servants of the organisation regarding civil rights and obligations".

Religious communities also have to include documentary evidence that they have a suitable venue, which cannot be a residential address, with all documentation related to the venue's purchase or rental.

Article 10, Part 3 of the 2025 Religion Law requires religious organisations to include in their statute "the territories in which the religious organisation carries out its activity".

Under Article 21, the SCRA has 30 days to consider registration applications. The SCRA checks "the veracity of information and accordance with the current Law" of the application and associated documents. The SCRA would be allowed an extra 30 days if it considers it necessary to get an "expert analysis" on undefined "controversial issues".

Article 21 specifies that, "in cases of necessity", the SCRA has the right to seek extra information or to forward the applicant's documents to the "appropriate state agencies" (unspecified). These would probably be the Interior Ministry and the NSC secret police.

Article 21 allows the SCRA to reject applications if an "expert analysis" finds a "failure to abide by the demands of legislation on countering extremist activity".

The NSC secret police already blocks registration applications, attempts to ban religious communities (such as Jehovah's Witnesses), and has been responsible for the banning of Ahmadi Muslims.

Regime "expert analyses" of religious materials and religious communities' beliefs have been used to justify regime human rights violations, such as censoring and banning films and texts officials dislike, attempting to ban an entire religious community, and in August 2023 jailing a Protestant for six months for questioning regime policy on freedom of religion or belief.

Article 9, Part 9 allows individuals to check in advance with the SCRA if a proposed name for a religious organisation would be suitable.

Under Article 18, Part 1 a registered religious organisation is required to re-register (under the full requirements imposed for registration) in the case of reorganisation, a change of name, amendments to the statute, or if a court ordered re-registration. They are also required to re-register when the 10-year validity of their registration certificate runs out.

Repeated denials of state registration, raids

Many religious communities have for many years been repeatedly denied state registration. The Hare Krishna community in Bishkek, for example, has been trying for years to gain state registration, and in 2009 various regime officials told it of a "secret instruction" to block its registration attempts. The Hare Krishna community met the SCRA on 24 July 2023, and was told that it must fulfil the Religion Law's (then) requirements for 200 adult founders and other necessary documents.

However, "many members are afraid to give their signatures, names and other details to state agencies as they fear state reprisals", human rights defender Erzhan Kayipov told Forum 18. "This puts the community in a very awkward situation, outside the law and vulnerable to punishment by the state at any time and in any circumstances."

On 11 June 2023, officials of the Interior Ministry, police "Department for the Struggle against Extremism and Illegal Migration," and the SCRA raided the wedding rehearsal of a Hare Krishna couple. This was taking place in the flat of another Hare Krishna devotee. The devotee was fined just over two weeks' average wage, and about 10 Indian students present had their student visas cancelled and were deported.

Similarly, in November 2024 the NSC secret police, ordinary police, and SCRA officials raided a public event with an international guest speaker arranged by members of Bishkek's Hare Krishna community. The NSC secret police said that attendees were "lectured about cleansing of self-consciousness and psychological courses on self-improvement". However, the NSC claimed, attendees "were not informed that the event is of a religious nature".

"The International Society for Krishna Consciousness, which is a sect, was involved in illegal religious activity," the NSC secret police also claimed. The NSC said it is running "a campaign of operational-search measures to prevent illegally operating religious sects and organisations in the territory of Bishkek City." In the course of this, it "identified and halted the illegal activity of the Hare Krishna community".

The SCRA and the ordinary police then drew up reports of an offence against 16 members of the Hare Krishna community, and each was fined two weeks' average wage. The NSC then publicly urged "citizens to be on guard not to participate in commercial courses of such pseudo-psychologists in order to prevent the activity of sects".

Similarly, on 25 June 2024, the NSC secret police and ordinary police "Department for the Struggle against Extremism and Illegal Migration" officers raided a meeting of more than 100 young people from Protestant churches around Central Asia. It appears that the ordinary police and the NSC secret police already knew from informers among the participants that the conference was taking place, Protestants told Forum 18. Regime officials also had photos of the conference which some participants had apparently shared with them.

Police claimed that an "illegal" religious meeting was taking place, and detained and questioned five conference leaders for nine hours. The NSC secret police announced that it had "halted the religious-propaganda activity of adepts of the Word of God religious movement". Three leaders were fined two weeks' average wage and deported.

Communities seeking registration have long found that decisions are arbitrary. An association of the Falun Gong spiritual movement

was registered in July 2004, but - under Chinese pressure - was liquidated as "extremist" in February 2005. On 26 January 2018 the Chui-Bishkek Justice Department in the capital Bishkek registered a Falun Gong association. However, on 20 March 2018, less than eight weeks later, the Justice Department issued a decree cancelling the registration, according to the Justice Ministry register of legal entities.

In a similar arbitrary decision, officials banned Ahmadi Muslims as allegedly "extremist". They have not been able to publicly meet for worship since July 2011 after the NSC secret police told the SCRA that they are a "dangerous movement and against traditional Islam".

Unregistered religious communities particularly are "in danger of being punished for their religious activity at any given moment", Jehovah's Witnesses observed to Forum 18. Denials of state registration make Jehovah's Witness communities illegal, and have "a chilling effect", leaving them "vulnerable to police harassment", and "landlords are unwilling to rent property where they could hold peaceful religious meetings".

Multiple raids have taken place against Jehovah's Witnesses meeting for worship, including a 10 August 2024 raid by the ordinary police and NSC secret police on a Jehovah's Witness meeting in Kyzyl-Kiya in the south-western Batken Region. Religious materials, including two Bibles and a laptop, were confiscated and would be sent for "expert analysis to see whether the materials contain extremist ideas", regime officials told Jehovah's Witnesses. Jehovah's Witnesses told the officials that all the texts were imported with permission of the State Commission for Religious Affairs (SCRA), but they were still sent for "expert analysis".

All 16 Jehovah's Witnesses were detained and questioned for six hours, Jehovah's Witnesses told Forum 18. "The officer then took several Jehovah's Witnesses to the nearest police station for further questioning. At the station they were once again questioned, personal photos were taken, and they were then released." On 11 August 2024, the day after the raid, regime-controlled news agencies stated that Jehovah's Witnesses "who illegally met for preaching and reading religious books were detained by the police". Jehovah's Witnesses told Forum 18 that they think this was "done to scare the public". Jehovah's Witness communities, including in Batken Region, have been repeatedly denied state registration.

(In December 2019, the NSC secret police opened a criminal case against unspecified members of the Jehovah's Witness national centre in Bishkek on charges of inciting religious hatred. The criminal case has never been closed.)

SCRA Deputy Director Kanatbek Midin uuly and the NSC secret police both refused to talk to Forum 18 about the raids on Jehovah's Witness, Hare Krishna, and Protestant events.

Regime denies legally binding human rights obligations are legally binding

Kyrgyzstan ratified both the International Covenant on Civil and Political Rights (<https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-civil-and-political-rights>) (ICCPR) and its Optional Protocol (OP1) (under which individual complaints (<https://www.ohchr.org/sites/default/files/2021-08/FactSheet7Rev.2.pdf>) are made) on 7 October 1994. By voluntarily doing this, Kyrgyzstan took on both the binding international human rights law obligations of the ICCPR, and the obligation to correct any violations (<https://www.ohchr.org/en/instruments-and-mechanisms/international-human-rights-law>) of its obligations – such as violations found by the United Nations Human Rights Committee.

Individual complaints to the UN Human Rights Committee include those concerning Jehovah's Witness communities, which have been repeatedly denied state registration since 2010. In March 2019 (CCPR/C/125/D/2312/2013 (<https://undocs.org/CCPR/C/125/D/2312/2013>)) and in December 2021 (CCPR/C/132/D/2659/2015 (https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CCPR%2fC%2f132%2fD%2f2659%2f2015&Lang=en)) the Human Rights Committee found that Kyrgyzstan violated the rights of Jehovah's Witnesses by arbitrarily refusing state registration to their communities in Naryn, Osh, and Jalal-Abad Regions.

The most recent SCRA denials of registration applications by Jehovah's Witness communities in Jalal-Abad, Naryn, Osh, and Batken Regions came on 16 March 2022. In all four of these Regions state officials have repeatedly refused to explain to Forum 18 why they rejected the registration applications. Jehovah's Witnesses challenged the denials in Bishkek City Court on 1 August 2022.

During the hearing, the SCRA claimed – wrongly – that UN Human Rights Committee views "are for consideration but not for implementation". Bishkek City Court accepted the SCRA's excuses and refused to order the registration refusals to be reconsidered. Both the SCRA and court officials refused to explain to Forum 18 why the SCRA rejected the registration applications again, ignored repeated Human Rights Committee decisions, and why the SCRA claimed that Kyrgyzstan's legally binding international human rights law obligations are not legally binding.

Similarly, Nursultan Amirakulov of the Chancellery of the Supreme Court also refused to explain to Forum 18 how Kyrgyzstan's legally binding international human rights law obligations are not legally binding. After Forum 18 explained the details of the case, he responded: "We have many complaints from Jehovah's Witnesses with us, which one exactly are you talking about?" When

Forum 18 once again explained the case he refused to discuss it. When Forum 18 asked again why Kyrgyzstan's legally binding international human rights law obligations are not legally binding, Amirakulov refused to answer, repeating his previous response.

Religious organisations must re-register every 10 years

Article 8 of the 2025 Religion Law divides registered religious organisations (the only ones allowed to exist and function) into central and local organisations.

Article 9, Part 2 specifies that the required compulsory SCRA registration lasts no more than 10 years. Religious organisations that want to continue to function will then be required to undergo re-registration. No reason is given for the 10-year time limit on the validity of registration.

Article 18 specifies that re-registration applications will entail the same requirements as in the original registration procedure. This requires a meeting of all the adult citizen founders and preparation of all required documentation.

The 2008 Religion Law had no time limit for the duration of registration. However, Article 40 of the 2025 Religion Law specifies that provisions (such as existing state registration) related to registered religious organisations will not have retroactive force. It appears that religious organisations that had registration at the time the new Law entered legal force on 1 February 2025 will have to re-register 10 years later.

One Protestant expressed concern about re-registration, commenting that "we think that they will use this to close down any church they do not like". Another Protestant, who wished to remain anonymous for fear of state reprisals, described the "repetition of this [re-registration] process" to Forum 18 as "an immense burden". Jehovah's Witnesses commented that "this proposed 're-registration' process can be used as a tool to deny registration to religious minorities".

Central spiritual administrations given power over individual communities

Under Article 11 of the 2025 Religion Law, only religious organisations of one faith will be allowed to form one central spiritual administration.

Article 11, Part 2 also specifies that for Muslims, the central spiritual administration will be the regime-controlled Muslim Board (Muftiate). This would appear to prevent the formation of independent nationwide Muslim bodies that are not controlled by the regime. Why Muslims are targeted by this restriction is not explained.

Article 11 defines the functions of a central spiritual administration as, among others, to name leaders of religious educational establishments and of individual communities under the central spiritual administration. This will prevent imams not appointed by the state-controlled Muslim Board from leading Islamic communities.

Central spiritual administrations are also responsible for applying to the SCRA to found and build religious educational establishments and places of worship.

SCRA given extensive arbitrary "control" powers

Under Article 36 of the 2025 Religion Law, the State Commission for Religious Affairs (SCRA) and its regional branches exercise "control" over how registered religious organisations and religious education establishments, as well as registered places of worship, abide by the provisions of the Religion Law and their own statutes.

The SCRA has the right to demand administrative and financial documents from the leadership of registered religious organisations. It also has the right to seek such information from state tax and statistics authorities, as well as from banks.

The SCRA also has the right to send its officials to attend events by registered religious organisations.

The SCRA is empowered to inspect registered religious organisations, religious education establishments and place of worship. Regime agencies and municipal bodies can ask the SCRA to conduct such an inspection of a particular religious organisation or place of worship.

Under Article 37, if SCRA officials find a violation of the Religion Law during such an inspection, the SCRA issues a written warning to the religious organisation specifying a deadline (of up to 30 days) by which it will have to have ended the violation.

If the religious organisation does not in the SCRA's view end the violation within the SCRA's deadline, the SCRA can, under Article 37, ban the organisation's activity for 90 days. If the religious organisation still does not in the SCRA's view end the violation within that period, the SCRA can go to court to liquidate the organisation. This makes all exercise of freedom of religion or belief by the organisation illegal.

The exercise of freedom of religion or belief by religious organisations can also be "halted, liquidated, or banned" if they violate the February 2023 Countering Extremist Activity Law.

Intrusive reporting requirements

Article 36 of the 2025 Religion Law specifies that the SCRA and its regional branches check that every type of religious organisation and their approved places of worship act in accordance with their statutes and the requirements of the Religion Law. The SCRA is empowered to demand to see administrative and financial documents, send officials to attend events, and inspect financial and other transactions.

Article 36 requires registered religious organisations, religious education establishments, and religious charities to provide the tax authorities and the SCRA with intrusive reports revealing extensive personal, organisational, and financial information.

Reports to the SCRA are to include "an annual report on its activities, including religious premises, personnel of governing bodies, employees, teachers and students for a religious educational establishment, as well as documents on the expenditure of funds and the use of other property, including those received from international and foreign organisations, foreign citizens and stateless persons".

If a religious organisation fails to supply the annual report, the SCRA issues a written warning. If it fails to comply within the SCRA's deadline of up to 30 days, the SCRA can, under Article 31, ban the organisation's activity for 90 days. If it then fails to comply within that period, the SCRA can go to court to liquidate the organisation (thereby rendering all its activity illegal).

If a religious organisation commits a violation for the second time within a year, the SCRA can go to court to have the organisation liquidated.

Places of worship require registration

Article 17 of the 2025 Religion Law requires state registration with the SCRA of buildings used by both registered religious organisations (including places of worship), and by registered religious education establishments. Such buildings can only be used after they have gained state registration.

In the SCRA justification for the then draft Religion Law (see above), SCRA Chair Yusupov claimed that registering places of worship and banning building them on private land are necessary because "the building of religious buildings has been chaotic because of the absence of laws".

Registration applications for communities under a central spiritual administration can only be lodged by the administration, which will also own the building. This would mean, for example, that the Muslim Board will be the only body allowed to apply for approval of a new mosque.

If a religious community is not part of a registered central spiritual administration, the local community must apply for registration for its place of worship.

Applications to register a place of worship need to include documents confirming the ownership, rental or other legal use of the building.

A Protestant, who wished to remain anonymous for fear of state reprisals, described the registration requirement for places of worship as "an extra burden on religious organisations". "Getting such registration will be a difficult process, as the NSC secret police, the Interior Ministry, and local mayors' office will have to give permission for such registration," the Protestant told Forum 18. "The registration as a religious building could mean that the community may be banned in future to use it for other purposes for its members or the wider public."

Under Article 17, Part 10, building places of worship on land owned by individuals is banned.

A Protestant, who wished to remain anonymous for fear of state reprisals, told Forum 18 in December 2024: "Construction of church buildings on private land will be very difficult, as the state authorities will invent excuses not to give permission."

The Protestant also noted that "using private homes to exercise freedom of religion or belief with others will be banned under the Law", adding: "This will make meeting for worship almost impossible for many churches." This will force religious communities into central spiritual administrations to get state registration for their buildings, "which will make state control of religious communities easier, and also allow the regime to decide how many religious buildings will be allowed".

Once a religious building is registered, under Article 17 the owner is required to notify the local administration where it is based within five working days of its registration and its address. The owner's name, address, phone number, e-mail address and passport

details must also be provided. The owner needs to send confirmation of this notification to the SCRA within five working days.

The Cabinet of Ministers is in charge of setting out provisions for building, reconstructing or changing the usage of such religious buildings.

Article 17 specifies that the number of religious properties must not exceed a number set by the Cabinet of Ministers.

The Amending Law's changes to the Violations Code adds a provision to Violations Code Article 142 to punish those who use a place of worship which is not registered with the SCRA with a fine of 200 Financial Indicators (FIs) on individuals (20,000 Soms, equivalent to three weeks' average wage) and 650 FIs on organisations. The Violations Code allows the police and the SCRA to issue summary fines for violating Article 142.

"Preachers" must be registered every year

In a new move, Kyrgyz citizens who want to carry out undefined "preaching activity" within the country or abroad will require state registration.

Religion Law Article 3 defines a "preacher" as a Kyrgyz citizen "involved in spreading a religion by various methods (including through the media and on the internet)" appointed by a registered central spiritual administration, and who has been given SCRA registration as a preacher.

Only registered religious organisations can have "preachers". Also, "only those people who have specialised higher or general religious education can act as preachers", Article 13 of the Religion Law states.

"Preachers" must apply to the SCRA for registration. They must submit written approval from a registered central spiritual administration together with their application, passport, and religious diploma. SCRA registration lasts for up to one year, though a preacher can apply to extend this period. When the SCRA issues the registration certificate, the SCRA must then tell the "preacher" that they must not violate the Religion Law, and that any violations will be taken into account in deciding on registration period extensions.

Within five working days of gaining SCRA registration, the preacher must notify the local administration where they will be conducting preaching activity. They will have to provide their passport details, their contacts and their residential address. They will then have five working days to provide confirmation of this notification to the SCRA.

Article 13 states that "preachers" can only speak in the name of a state-registered central spiritual administration, and can only act within a state-registered religious community's territory. However, "spreading a religion" is not explicitly defined. It is unclear whether a "preacher" and "preaching activity" taking place in the context of a regular meeting for worship within a state-registered place of worship of a state-registered religious community requires SCRA registration.

Members of various religious communities, who wished to remain anonymous for fear of state reprisals, criticised both the Law's regulation of "preachers" and lack of clarity. This leaves much room for arbitrary state actions.

Protestants, for example, criticised the requirement for "preachers" to be registered by the SCRA every year. "It is also unclear what exact relationship preachers must have with a registered church. Will they need the permission of a central spiritual administration, which potentially creates greater regime control of preachers?"

Similarly, other Protestants also criticised the regime's claim to determine who is a "preacher". "It is not clear to us if a preacher is defined as a pastor of a church, and will pastors need to be separately registered by a local administration and the SCRA?" They observed that "this would allow local authorities or the SCRA to block, obstruct, or punish pastors".

Under Article 13, the "preacher" must get the approval of the registered central spiritual administration of their religious community for the content of their sermons.

Under Article 11, "preachers" can only appear in the media or online after the central spiritual administration of a registered religious community has gained permission from the SCRA.

"Registration does not give you the freedoms one should expect"

State registration does not remove many obstacles to exercising freedom of religion and belief. Members of a variety of communities throughout the country, all of whom wished to remain anonymous for fear of state reprisals, pointed out to Forum 18 that among the problems they face "communities cannot have public meetings outside their registered addresses unless they receive prior permission for each event from the authorities, and our experience is that the authorities do not normally give permission", and "the authorities have punished people for sharing their beliefs in public places with adults."

One member of a religious community who wished to remain anonymous told Forum 18 that "practically speaking, registration only gives you permission to exist. Registration does not give you the freedoms one should expect."

On 26 March 2023, the State Commission for Religious Affairs (SCRA), the National Security Committee (NSC) secret police, and Talas police "Department for the Struggle against Extremism and Illegal Migration" raided the registered St Nicholas Catholic Church in Talas, in the north-western Talas Region, after a Sunday evening Mass. Officers, some of them carrying weapons, forced those leaving the state-registered Church back into the Church.

The armed officers forced people to remain in St Nicholas Church for about one and a half hours until two Slovak nuns, Sister Daniela Cincilova and Sister Eva Eliasova, signed a statement that they were "guilty" of alleged "illegal missionary activities" and "spreading their ideology". The nuns' "crime" was to read passages from the Bible aloud in the Church during Mass. The SCRA then fined the nuns the maximum fine under Violations Code Article 142, Part 4 ("Carrying out religious activity without registration at the executive state body for religious affairs") of just over two weeks' average wage. The Catholic Church appealed against the fines.

Also in spring 2023, two foreign Protestants at a registered Protestant church were fined for "illegal missionary activity" after a raid by regime officials, a local Protestant who wished to remain anonymous for fear of state reprisals told Forum 18. The raid and fines also took place around the time St Nicholas Church in Talas was raided, and included officials from the police "Department for the Struggle against Extremism and Illegal Migration".

Three days after the raid on St Nicholas Church, on 29 March 2023, the SCRA wrote to the Catholic Apostolic Administration in Bishkek (which leads the Church in the country) threatening that if more "violations" occur, the SCRA will "take action against the Apostolic Administration in Kyrgyzstan for its liquidation".

SCRA Deputy Director Kanatbek Midin uuly refused to explain to Forum 18 why his fellow-Deputy Director Zamir Kozhomberdiev threatened the Catholic Church in writing with possible liquidation.

The Interior Ministry and police "Departments for the Struggle against Extremism and Illegal Migration", the SCRA, and the NSC secret police all refused to explain to Forum 18 why the regime violates its legally-binding international human rights obligations.

Public events require SCRA permission

Under Article 31 of the 2025 Religion Law, registered religious organisations and educational establishments are allowed to hold events in their own premises, at places of pilgrimage and at cemeteries.

For any religious rituals or other mass events they plan elsewhere, they need to notify the local administration and the SCRA 10 working days before the proposed event, giving the date, location and programme of activity. The local administration and the SCRA are responsible for giving or refusing permission for the event.

Religious events in prisons, homes for elderly or disabled people, or the armed forces are allowed only at the request of residents and in special premises. The institution's administrations must also get approval for the event from the SCRA.

The creation of religious organisations in state bodies (including the armed forces) is banned by Religion Law Article 5.

The Amending Law's changes to the Violations Code adds a provision to Violations Code Article 142 to punish those who exercise freedom of religion or belief without SCRA permission with a fine of 200 Financial Indicators (FIs) on individuals (20,000 Soms, equivalent to three weeks' average wage) and 650 FIs on organisations. Violations Code Article 142 allows the police and the SCRA to issue summary fines for violating the Religion Law.

Religious materials censored

Article 32 of the 2025 Religion Law specifies that registered religious organisations have the right to produce, acquire, distribute, export and import religious literature and other materials (which includes items in the media and on the internet). It says that the procedure would be set out by the Cabinet of Ministers, but gives no information about what this procedure might consist of.

Under Article 32, individuals entering the country are allowed to have only one copy of any one religious publication, which are for their own use only.

Imports of religious literature are already subject to SCRA censorship. For example, in 2022 the SCRA denied permission to import the 2022 issue of a Jehovah's Witness booklet, the Kyrgyz version of "Examining the Scriptures Daily". This was one of 13 publications and six videos the NSC secret police and the General Prosecutor's Office tried to have declared "extremist" in a failed 2021 application to the courts.

On 23 February 2023, the SCRA denied permission to import a Jehovah's Witness brochure for parents to read with their children, "The Lessons for Little Ones" in both Kyrgyz and Russian. "Although Jehovah's Witnesses met with SCRA representatives to discuss this instance of religious censorship, the SCRA's decision to ban the brochure still stands," Jehovah's Witnesses noted.

Article 32 of the 2025 Religion Law empowers the SCRA to conduct "religious studies expert analyses" of printed and online religious literature and materials. It will normally have up to 30 working days to complete such analyses, but this could be extended by an extra month "taking into account the level of complexity and quantity of materials".

All religious literature acquired by libraries requires a SCRA "religious studies expert analysis".

Regime "expert analyses" of religious materials and religious communities' beliefs have been used to justify regime human rights violations, such as censoring and banning films and texts officials dislike, attempting to ban an entire religious community, and in August 2023 jailing a Protestant for six months for questioning regime policy on freedom of religion or belief (see above).

The most high profile film censorship case was the 2012 banning of the film "I am Gay and Muslim", in which five Moroccan men reflect on their orientation and Islam. After a protest from the then-acting Chief Mufti to the NSC secret police, the NSC asked the SCRA to conduct an "expert analysis", which classified the film as "extremist".

The NSC confiscated the film before it was shown at Bishkek's Bir Duino (One World) human rights film festival, warned the festival organiser that she could be prosecuted for "incitement of national, racial, or religious hatred", the State Communications Agency blocked internet access to the film, and it was placed on the Justice Ministry's list of banned "extremist" materials.

Article 32 of the 2025 Religion Law does not state when the SCRA can impose "expert analyses" on literature and materials, stating only that the procedure is set out by the Cabinet of Ministers. No information is given about what this procedure might consist of.

All religious literature, audio and video recordings, including online, produced by registered religious organisations or religious educational establishments has to have the full official legal name of the organisation and its religious affiliation.

Article 32, Part 4 bans the distribution of religious literature or materials "in public places, as well as by going round residential properties, state and municipal organisations, in military sites, and in pre-school and general educational establishments, with the exception of religious sites and religious educational establishments". Those who violate this face punishment under the Violations Code.

Article 142, Part 3 of the Violations Code already punished (before the 2025 amendments) distributing religious literature in public with a fine of 55 Financial Indicators (FIs) on individuals (5,500 Soms, equivalent to just over a week's average wage) and 170 FIs on organisations. The 2025 Amending Law's changes to the Violations Code specified in more detail the sorts of distributed religious materials and places where it is distributed (including in public places and going door to door) for which punishment is set out. It also increased the fines to 200 FIs (20,000 Soms, equivalent to three weeks' average wage) on individuals and 650 FIs on organisations.

Violations Code Article 142 allows the police and the SCRA to issue summary fines for violating the Religion Law.

A member of a religious community expressed concern about the restrictions on sharing faith in public, commenting: "Even if you can register overcoming all the obstacles put there by the authorities, we won't be able to effectively share our faith." They added, "We would like to pass out our books and literature on the street to others so they can find out about our faith, but this is directly banned."

Religious education – with state permission only

Article 6, Part 9 of the 2025 Religion Law specifies that religious education (whether of children or adults) is to be under the control of the Cabinet of Ministers, but gives no information about what this control might consist of.

Under Article 6 and Article 12, for religious communities that are part of central spiritual administrations, only the administrations are allowed to apply to the SCRA for permission to establish religious educational establishments "for children and adults". Registered religious communities which are not part of central spiritual administrations are also allowed to apply to the SCRA for permission to found such establishments.

Article 6, Part 3 allows registered religious organisations to establish religious educational establishments to prepare "clergy and religious personnel they need". It remains unclear why they are not able to establish such facilities for any adult who wishes to learn more about a faith. They are also allowed to hold "short-term religious courses for adults and children".

Article 12, Part 1 specifies that only registered religious organisations can found religious educational establishments.

Article 12, Part 6 specifies that applications from a registered religious organisation to register a religious educational establishment with the SCRA need to include "a curriculum together with a list of religious literature to be used in study".

The application will also need to show that the religious educational establishment has "high-quality teachers" approved by the founding registered religious organisation.

Article 6, Part 6 specifies that anyone teaching religion in a registered religious educational establishment has to have "specialised higher or general religious (spiritual) education" with an appropriate certificate.

The applicant religious organisation also needs to submit documents for the premises where the religious educational establishment is based, together with certification of the premises from the sanitary-epidemiological and fire services.

Article 6, Part 8 of the 2025 Religion Law requires SCRA permission for adults to travel abroad to study in a religious educational establishment. The SCRA then informs the Foreign Ministry. Those studying abroad must register with the Kyrgyz consulate in the country where they are studying. The SCRA maintains a list of "recommended" religious education establishments abroad.

A member of a religious community, who wished to remain anonymous for fear of state reprisals, commented: "We would like to send our members, who have the possibility to go, to study abroad since we are not able to do so in Kyrgyzstan."

Once a religious educational establishment is registered, under Article 36 it is required to notify the local administration where it is based within five working days of its registration and its address. It also has to provide it with the name, address, phone number, and passport details of the head of the establishment. The religious educational establishment needs to send confirmation of this notification to the SCRA within five working days.

Once a religious educational establishment is registered, it must notify the administration where it is based within 5 working days. Under Article 19, it is required to notify the SCRA within 30 days of any changes to its name, address, leadership body, phone number, or e-mail address.

Individual religious teaching banned

Article 6, Part 7 of the 2025 Religion Law continues to ban teaching religion individually outside a registered religious educational establishment. Those who violate this face punishment.

The Amending Law's changes to the Violations Code added a provision to Article 142 to punish those who teach religion individually outside a registered religious educational establishment with a fine of 200 Financial Indicators (FIs) on individuals (20,000 Soms, equivalent to three weeks' average wage) and 650 FIs on organisations.

Violations Code Article 142 allows the police and the SCRA to issue summary fines for violating the Religion Law.

One individual noted, before the 2025 Religion Law was passed, that young people go to a mosque and receive "short lessons on behaviour, prayer or reading the Holy Koran". They added that "a person can simply come with questions to the imam, and during the time when the imam answers his questions, some may consider this a lesson in the wrong place and fine him?!"

Foreign missions and "missionaries" require registration

Articles 14 and 15 of the 2025 Religion Law require missions of foreign religious organisations and those sent by foreign religious organisations "to conduct religious activity in Kyrgyzstan" (also described as "missionaries") to have state registration with the SCRA. Under Article 14, missions require 200 adult citizen founders living in one Region, and all their personal details (confirmed by a notary) will have to be submitted with the application.

Among other restrictions, missions must provide for all staff members their full names, birth dates, citizenship, education, places of previous work, and residential addresses.

Missions must supply "information about the basics of the doctrine and the practice corresponding to it, including the history of its origin, the forms and methods of its activities, the attitude towards family and marriage, education, the specifics of the mission's attitude towards the health of followers of the given religion, and restrictions for members and servants of the organisation regarding civil rights and obligations".

The SCRA allows "missionaries" to operate for one year, although this can be renewed for a maximum of a further three years.

Religious believers banned from political activity

Article 5, Part 7 of the 2025 Religion Law bans "interference by religious figures in the activity of state bodies, local administrations

and their officials, including exerting pressure on them in any form".

Many of the Religion Law's provisions on this and other topics are vaguely worded. It remains unclear if religious community members who lobby state officials or parliamentary deputies on state policy on freedom of religion or belief or other issues of public concern, or even simply express their opinions on such subjects, would be violating this ban. Article 5, Part 7 also bans "parties and other political formations founded on a religious basis".

Articles 3 and 4 of the Amending Law ban elected deputies of local keneshes and the national Zhogorku Kenesh from conducting undefined "religious activity". It is unclear what this means, for example if deputies cannot be leaders or members of registered religious organisations, or even be banned from attending any meetings for worship.

The ban on religiously-inspired political parties could affect the Yiman Nuru (Light of Faith) Party, which has an Islamic inspiration, though a parliamentary official insisted in February 2025 that it would not. The Justice Ministry registered the party in June 2012, and the party gained five deputies in November 2021 parliamentary elections (<https://www.osce.org/files/f/documents/2/f/519087.pdf>).

State control and impunity

The regime systematically violates intertwined fundamental rights in its quest to control the society it rules. Without fundamental change - especially genuine independently verifiable implementation of international human rights obligations – it is likely that the regime's officials will continue to violate fundamental human rights with impunity. (END)

More reports on freedom of thought, conscience and belief in Kyrgyzstan (<https://www.forum18.org/archive.php?country=30>)

Previous Forum 18 Kyrgyzstan religious freedom surveys (<https://www.forum18.org/analyses.php?region=30>)

Forum 18's compilation of Organisation for Security and Co-operation in Europe (OSCE) freedom of religion or belief commitments (https://www.forum18.org/archive.php?article_id=1351)

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