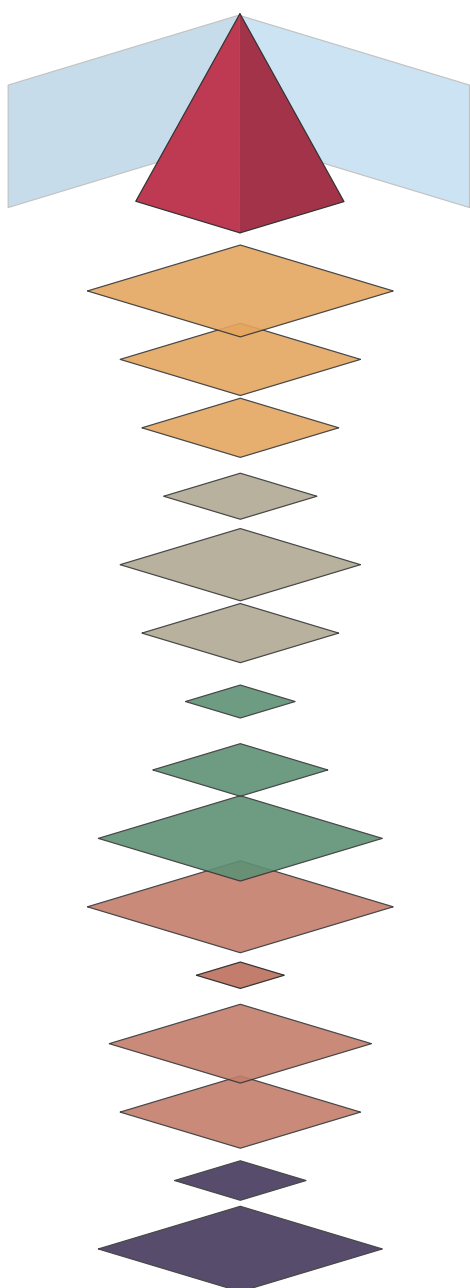
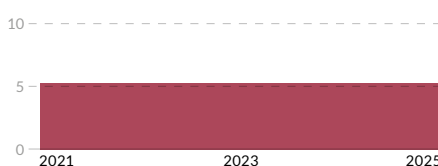


KYRGYZSTAN



5.25 $\nearrow 0.07$
CRIMINALITY SCORE

85th of 193 countries $\nearrow 4$
25th of 46 Asian countries $\nearrow 1$
2nd of 8 Central Asian and Caucasian countries -



CRIMINAL MARKETS 4.90 $\nearrow 0.27$

HUMAN TRAFFICKING	7.00	0.00
HUMAN SMUGGLING	5.50	0.00
EXTORTION & PROTECTION RACKETEERING	4.50	$\nearrow 1.00$
ARMS TRAFFICKING	3.50	0.00
TRADE IN COUNTERFEIT GOODS	5.50	$\nearrow 0.50$
ILLCIT TRADE IN EXCISABLE GOODS	4.50	$\nearrow 0.50$
FLORA CRIMES	2.50	0.00
FAUNA CRIMES	4.00	$\nearrow 0.50$
NON-RENEWABLE RESOURCE CRIMES	6.50	0.00
HEROIN TRADE	7.00	$\nearrow 0.50$
COCAINE TRADE	2.00	0.00
CANNABIS TRADE	6.00	0.00
SYNTHETIC DRUG TRADE	5.50	$\nearrow 0.50$
CYBER-DEPENDENT CRIMES	3.00	$\nearrow 1.00$
FINANCIAL CRIMES	6.50	$\nearrow 0.50$



CRIMINAL ACTORS 5.60 $\nearrow 0.40$

MAFIA-STYLE GROUPS	5.50	$\nearrow 1.00$
CRIMINAL NETWORKS	5.50	$\nearrow 0.50$
STATE-EMBEDDED ACTORS	8.50	0.00
FOREIGN ACTORS	4.50	0.00
PRIVATE SECTOR ACTORS	4.00	$\nearrow 0.50$



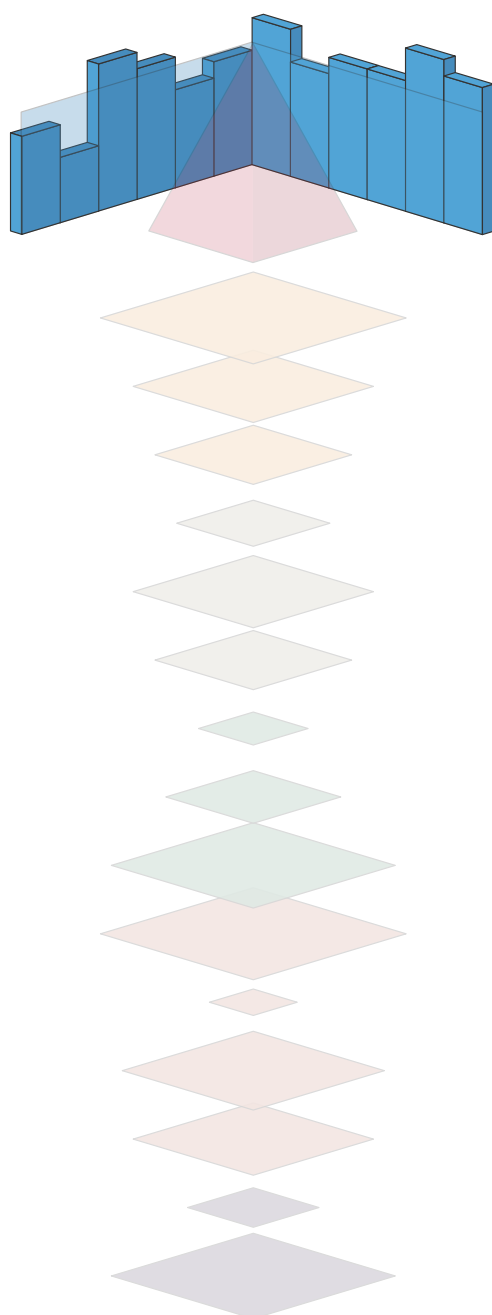
This project was funded in part
by a grant from the United
States Department of State.



Funded by
the European Union

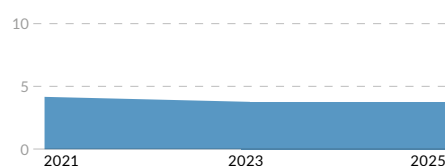
ENACT is funded by the European Union
and implemented by the Institute for
Security Studies and INTERPOL, in
affiliation with the Global Initiative Against
Transnational Organized Crime.

KYRGYZSTAN



3.79 ↘0.04 **RESILIENCE SCORE**

141st of 193 countries -
32nd of 46 Asian countries **↘1**
6th of 8 Central Asian and Caucasian countries -



POLITICAL LEADERSHIP AND GOVERNANCE	3.00	0.00
GOVERNMENT TRANSPARENCY AND ACCOUNTABILITY	2.00	↘0.50
INTERNATIONAL COOPERATION	4.50	0.00
NATIONAL POLICIES AND LAWS	4.00	0.00
JUDICIAL SYSTEM AND DETENTION	3.00	0.00
LAW ENFORCEMENT	3.50	↗0.50
TERRITORIAL INTEGRITY	4.50	↗0.50
ANTI-MONEY LAUNDERING	3.50	↗0.50
ECONOMIC REGULATORY CAPACITY	4.00	↘1.00
VICTIM AND WITNESS SUPPORT	4.00	0.00
PREVENTION	5.00	0.00
NON-STATE ACTORS	4.50	↘0.50



This project was funded in part by a grant from the United States Department of State.



Funded by
the European Union

ENACT is funded by the European Union and implemented by the Institute for Security Studies and INTERPOL, in affiliation with the Global Initiative Against Transnational Organized Crime.

CRIMINALITY

CRIMINAL MARKETS

PEOPLE

Kyrgyzstan is a source, transit and destination country for human trafficking, with forced labour and sexual exploitation being the most prevalent forms. Socio-economic conditions, including poverty and entrenched gender practices, exacerbate vulnerabilities. The criminal market is facilitated by organized crime groups, foreign actors, corrupt officials and private-sector enablers. Victims, including Kyrgyz nationals and foreign individuals from Uzbekistan, Bangladesh and Russia, are subjected to forced labour in agriculture, construction, the textile industry and domestic work. Human trafficking is closely linked with other criminal markets, particularly arms and drug trafficking. Child labour and bride kidnapping (*ala kachuu*) are concerning practices and contribute to exploitation cycles. Authorities dismantled a child trafficking ring in 2024, but gaps in victim services, coupled with legal enforcement challenges, continue to hinder anti-trafficking efforts.

Kyrgyzstan's porous borders, weak migration controls and geographic location contribute to a growing human smuggling market. Criminal networks, private-sector actors and corrupt officials facilitate irregular migration, often leading to exploitation in destination countries. Counterfeit documents and illicit migration channels have increased since Kyrgyzstan's accession to the Eurasian Economic Union (EAEU). Russia is the primary destination for Kyrgyz migrants, with many facing rights violations and discrimination. Recently, an increasing number of Kyrgyz migrants have opted for the US as a destination, relying on organized smuggling routes through Mexico. However, such attempts have become increasingly difficult owing to strengthened US enforcement efforts, resulting in fewer successful crossings. Telegram and other social media platforms are used to advertise illegal migration services.

Mafia-style groups and criminal networks engage in extortion and protection racketeering, targeting businesses and individuals. High-profile cases illustrate the market's scale. Entrepreneurs have been coerced into paying significant sums, and law enforcement has arrested members of criminal groups extorting both private businesses and government officials. Protection racketeering extends into public institutions, including schools. Criminal groups have also colluded with law enforcement to cover up extortion schemes. Despite some progress in dismantling these networks, the long-term impact remains uncertain.

TRADE

The country serves as both a transit and source location for illicit arms, particularly small arms and ammunition. Criminal networks, foreign actors and corrupt officials facilitate the trade, often in connection with drug trafficking and counterfeit goods. Operations such as INTERPOL's transnational enforcement efforts have resulted in major seizures, but localized trafficking persists. Firearms, including Kalashnikov rifles, are sold in informal markets, with some caches discovered in rural regions. Following the Taliban's resurgence in Afghanistan, arms trafficking risks in Kyrgyzstan have intensified. Corruption within border enforcement remains a significant challenge in curbing this criminal market.

Kyrgyzstan has a key role in the trade of counterfeit goods, with criminal networks exploiting its position along Central Asian trade routes. Key sectors affected include electronics, clothing and pharmaceuticals. Markets such as Dordoi Bazaar serve as hubs for counterfeit imports from China, often re-exported under fraudulent documentation. Smuggling channels and corruption within customs authorities facilitate the market. Intellectual property protections exist, but enforcement is weak; no successful prosecutions for violations have been recorded.

The illicit tobacco and alcohol markets are entrenched within Kyrgyzstan's underground economy. Smuggling networks are widespread, with clandestine factories operating in multiple regions. The country also serves as a transit hub for illicit alcohol within the EAEU, with shipments regularly seized at borders. Digital tracking measures have been introduced to combat the trade, yet enforcement gaps persist owing to collusion between officials and traffickers. Revenue losses due to the illicit cigarette market are estimated at several million dollars annually.

ENVIRONMENT

Illegal logging and deforestation, particularly in walnut-fruit forests, threaten Kyrgyzstan's biodiversity. The country, mainly a source for flora crimes, has experienced extensive forest degradation from illegal logging, overgrazing and firewood harvesting. Weak enforcement and regulatory loopholes allow private-sector actors and criminal networks to exploit timber resources. Despite protection measures, illegal harvesting continues, in particular in the Dzhети-Oguz and Karakol regions, although at limited scope and scale.

Kyrgyzstan is both a source and a transit country for wildlife trafficking, but the scale appears limited. Snow leopards, argali, and Siberian ibex are frequently poached for trophy hunting and international trade. Seizure records show ongoing smuggling to countries such as Kazakhstan, Serbia

and China, with transnational networks involving both domestic and foreign actors. Kyrgyzstan also re-exports high volumes of wildlife commodities, primarily from China. Law enforcement has made high-profile seizures, but corruption hampers effective control, especially in remote areas.

Illegal gold and coal mining is highly prevalent in Kyrgyzstan, driven by unemployment and weak regulatory oversight. These activities, concentrated in southern regions, involve diverse actors. The extractives sector remains a focal point of corruption, with government actors as well as private-sector actors implicated in illegal mining and facilitating illicit financial flows. Smuggled oil and illicit mineral exports further entrench criminal networks. Local communities often find themselves embroiled in this illicit economy, participating in illegal mining despite the inherent dangers. Kyrgyzstan's strategic geographical location not only makes it a hub for internal illegal mining but also creates transit routes for trafficked minerals from neighbouring countries such as Afghanistan and Tajikistan. In addition, oil is smuggled from Kazakhstan to Tajikistan through Kyrgyzstan, which underscores the complexity of the illicit resource trade networks.

DRUGS

Kyrgyzstan has a critical role in the heroin trade along the northern route between Afghanistan and Russia. State-embedded actors, mafia-style groups and transnational networks dominate the market. Large-scale seizures recorded in recent years highlight the ongoing presence of this trade in the country. Corruption within this market is a challenge, with traffickers exploiting law enforcement and border officials. The cocaine trade in the country is insignificant owing to people struggling economically and the prevalence of cheaper alternative drugs. Nevertheless, migration flows from Russia as an effect of the Russia-Ukraine war may have impacted the local demand for the drug. In contrast, Kyrgyzstan is a producer, transit and consumption country for cannabis, with cultivation widespread in rural areas. Hashish serves as a cash crop, feeding domestic and international markets. Law enforcement has targeted trafficking networks, but the trade remains resilient. Synthetic drug consumption and production have risen sharply. Digital platforms facilitate sales, with law enforcement increasingly dismantling online drug distribution networks. Recent operations have uncovered domestic production laboratories, signalling a shift from reliance on foreign imports.

CYBER-DEPENDENT CRIMES

Kyrgyzstan has experienced a rise in cyber-dependent crimes, including ransomware attacks and cryptocurrency fraud. Attacks often target local websites and there is a growing involvement of transnational actors, including criminal networks and foreign private-sector participants,

who exploit weak cybersecurity infrastructure. Despite government efforts, including a 2024 cybersecurity strategy that aims to enhance digital security, limited awareness of and poor performance by national cybersecurity exacerbate the risks. Hactivist groups have also escalated attacks on state and private systems, affecting banks, telecommunications and educational institutions. Bishkek is a focal point, with emerging risks tied to technologies such as illegal cryptocurrency exchanges.

FINANCIAL CRIMES

Financial crimes are widespread in Kyrgyzstan, encompassing diverse illicit activities. These include cyber-enabled offences such as email fraud, digital identity theft and payment and corporate data breaches, all of which result in significant financial losses for citizens. Criminal networks are increasingly relying on cyber-enabled methods, with phishing emerging as the most common tactic. In addition, tax evasion – often facilitated by corrupt state officials – is a pervasive issue in the country.

CRIMINAL ACTORS

Mafia-style groups in Kyrgyzstan are prominently represented by 'thieves in law', a hierarchical and deeply entrenched criminal subculture that stems from the Soviet era. The group, led by Kamchy Kolbayev, epitomized this structure, operating across multiple illicit markets, including drug trafficking, smuggling and robbery. His arrest in 2022 and subsequent death during a special operation in 2023 marked a pivotal moment, disrupting the internal cohesion of mafia-style groups. This action prompted coordinated crackdowns in Kazakhstan and Uzbekistan, highlighting the transnational ties of regional organized crime. Despite such setbacks, mafia-style groups maintain considerable influence in correctional institutions and retain public visibility, as evidenced by prisoners publicly commemorating Kolbayev. However, their traditional dominance has been increasingly challenged by state actors consolidating control over criminal markets. The weakening of mafia-style groups following the fall of figures like Kolbayev and the broader campaign to eliminate rival criminal players suggest a shift in power, although not a comprehensive dismantling of their structure.

Criminal networks in Kyrgyzstan are decentralized and opportunistic. These loosely affiliated networks specialize in illicit activities such as drug trafficking, racketeering and smuggling of goods, with distinct regional specializations: southern groups focus on narcotics and northern ones, particularly in Bishkek, engage in extortion and control over illicit trade in Chinese products. Their transnational collaboration is evident in ties with criminal counterparts in Russia, China, Tajikistan, Uzbekistan and Afghanistan. These networks also encroach on civic structures by extracting protection fees from small business owners

and positioning themselves as informal mediators in local disputes. Although recent mass arrests have also targeted network leaders following Kolbayev's death, such enforcement has proven selective, with prominent figures released under lenient conditions. The enduring influence of these networks, coupled with their adaptability and local embeddedness, underscores systemic vulnerabilities in law enforcement efforts.

State-embedded actors represent a critical component of Kyrgyzstan's organized crime landscape, often wielding more influence than traditional criminal groups. Organized crime in Kyrgyzstan is deeply entwined with state structures, with hundreds of civil servants dismissed for suspected affiliations with criminal groups. The current leadership's anti-corruption campaign has led to high-profile arrests, including a political figure's extradition in 2024. Nonetheless, doubts persist regarding the true intent of these crackdowns, as many detained individuals were subsequently released after paying fines, suggesting a monetized approach to justice.

Foreign actors contribute to Kyrgyzstan's organized crime dynamics, particularly with regard to drug trafficking and illicit trade in natural resources. The country's geographic location makes it a critical node in the regional drug corridor, where local groups collaborate extensively with foreign entities from Afghanistan, Russia, Tajikistan, Uzbekistan and

China. Ethnic-based networks – including Kyrgyz, Uzbek, Tajik, Azeri, Chechen and Russian groups – are especially active in drug trafficking, leveraging familial and cultural links across borders. The influence of transnational families further illustrates the convergence of global capital and organized crime. Despite moderate direct operational control by foreign actors, their strategic and financial influence on Kyrgyz criminal markets is significant and persistent.

Private-sector actors are implicated in the laundering of criminal proceeds, particularly through construction, telecommunications and wholesale trading enterprises. Following the killing of Kolbayev, authorities initiated a broad crackdown on business elites suspected of facilitating organized crime. This included the arrests of high-profile figures and directors from construction companies and telecommunications firms. Investigations uncovered systematic efforts to legalize illicit assets through business ventures, with some suspects compensating the state in exchange for release. These developments underscore the complicity of business leaders in the growth of organized crime and suggest that anti-crime measures, while impactful, may be undermined by selective enforcement and financial settlements. The extensive entwinement of private enterprise with criminal financing reflects broader systemic weaknesses in corporate oversight and regulatory enforcement.

RESILIENCE

LEADERSHIP AND GOVERNANCE

Kyrgyzstan faces significant political instability, characterized by weak governance and widespread corruption. The state is highly susceptible to the influence of organized crime, facilitated by a small group of elites who dominate the political landscape through competing patronage networks. Efforts to combat corruption and organized crime have been marred by a lack of transparency, political favouritism, and what experts describe as a selective or retaliatory application of justice. Despite official announcements of crackdowns on criminal elements, experts question the legitimacy and motivations behind such operations, citing low public trust in leadership and inconsistent enforcement.

Corruption is deeply embedded across all levels of society in Kyrgyzstan, often functioning as a means for the ruling elite to retain control. Laws to promote transparency and access to information are poorly enforced. Oversight, especially in areas such as public procurement and asset declarations, is insufficient, allowing corrupt practices to persist; recent legal reforms have sparked concerns that they may facilitate rather than curb corruption. Although there have been high-profile arrests, the lack of consistent

judicial outcomes and unclear asset recovery processes have cast doubt on the effectiveness of anti-corruption measures. Overall, the country is experiencing a decline in transparency and accountability, signalling a shift away from democratic governance.

Kyrgyzstan participates in several international treaties and frameworks targeting transnational organized crime, drug trafficking, human trafficking and environmental protection. The country has ratified several key conventions, including the UN Convention against Corruption and the UN Convention against Transnational Organized Crime. It also engages with organizations such as the Organization for Security and Co-operation in Europe (OSCE) and the Shanghai Cooperation Organization on regional security and anti-crime cooperation. Bilateral and multilateral extradition agreements have enhanced its ability to cooperate in cross-border investigations, particularly concerning narcotics and human smuggling. However, the implementation of commitments remains inconsistent. Notably, despite proposals to establish a regional organized crime centre in Bishkek, no concrete steps have followed. While Kyrgyz authorities collaborate

in anti-trafficking and border management initiatives, their efforts are limited in scope and often rely on international actors. As such they fail to comprehensively address all criminal markets, including extractive sector governance, where transparency standards remain unmet.

Kyrgyzstan has a comprehensive legal framework addressing organized crime, human trafficking, drug offences and environmental crimes, but enforcement is inconsistent. Laws criminalize the formation of criminal organizations, trafficking, illegal migration and arms offences, often with enhanced penalties when committed by organized groups. Despite ratifying international treaties and updating legislation, gaps persist, particularly in child sex trafficking definitions and implementation of anti-organized crime measures. Other measures, such as economic amnesties and firearms reform, reflect a mixed approach.

CRIMINAL JUSTICE AND SECURITY

The judicial system in Kyrgyzstan is widely considered one of the most corrupt institutions in the country. Reports consistently highlight bribery, political interference and the influence of organized crime in judicial appointments and verdicts. The presumption of innocence is regularly disregarded, and courts often operate under a presumption of guilt. Legal procedures are undermined by violations such as coerced confessions, denial of legal counsel and trials proceeding without sufficient or reliable evidence. Prison conditions further reflect systemic issues, with prison gangs exerting significant control over inmate discipline and resource distribution, often with the tacit consent of corrupt officials. Torture and abuse in detention facilities are reported, with several high-profile cases involving political detainees drawing attention to the lack of oversight.

Kyrgyzstan's law enforcement agencies are structurally tasked with combating various forms of organized crime, but are hampered by endemic corruption, a lack of resources and deep-rooted political interference. Public trust in the police is low, with arbitrary arrests, bribery and abuse of power, particularly in southern regions, frequently being reported. Effective law enforcement is further diminished by nepotism and informal arrangements with criminal actors, which reportedly include the systematic collection and distribution of bribes. Police also reported weakened crime-fighting capacity due to policies that have prioritized economic recovery. The state's initiatives to combat narcotics trafficking and other forms of organized crime have had limited success, in part owing to the reluctance of officials to disrupt profitable criminal arrangements. International training programmes continue to fill critical gaps in capacity, especially in emerging areas such as cybercrime. However, reliance on external support highlights the structural weaknesses within domestic institutions. In addition, some law enforcement operations appear politically motivated, targeting businesspeople and opponents under broad corruption or criminal charges.

Kyrgyzstan's geography presents significant challenges to effective border control, with porous frontiers in mountainous southern regions providing natural routes for trafficking. The country's strategic location and proximity to drug-producing and transit regions make it a key node in transnational smuggling networks, with criminal groups operating in known hubs such as Talas, Bishkek and Osh. The government has taken steps to improve border monitoring through policy reforms and partnerships with the International Organization for Migration, but significant gaps remain. Weak infrastructure and smugglers' reliance on low-technology transport routes, including horses and tunnels, hinder enforcement efforts. Recent seizures of smuggled goods and coordinated actions with neighbouring states indicate attempts to control cross-border flows, yet these remain reactive rather than systemic.

ECONOMIC AND FINANCIAL ENVIRONMENT

Kyrgyzstan has continued to make noteworthy progress in improving its anti-money laundering frameworks in 2024 since its removal from the Financial Action Task Force (FATF)'s grey list a decade before. Legal reforms have aligned national standards with FATF recommendations; however, significant deficiencies persist in implementation, particularly in risk understanding, domestic coordination and the confiscation of criminal proceeds. The volume of money laundering investigations and convictions is low, and parallel financial investigations are rarely conducted. Although authorities express readiness to support mutual legal assistance, law enforcement capacity is insufficient to address complex financial crimes. Ongoing concerns include limited oversight of financial intermediaries, weak supervision of cross-border flows and the continued presence of shadow economic actors. These issues highlight a disconnect between legislative strength and institutional capacity to deter financial crime effectively.

Kyrgyzstan's economic environment is characterized by corruption, state capture and a substantial shadow economy. Legislative reforms such as a new tax code and digitization efforts aim to formalize business practices and reduce informality, yet implementation is inconsistent. The mining sector is particularly politicized and prone to criminal influence, as evidenced by racketeering and informal governance by criminal groups. The state has taken controversial steps to assert national control, such as nationalizing major mining operations and banning foreign participation in future projects, but these actions have raised concerns about transparency and investor confidence. There are also emerging concerns about Kyrgyzstan's potential role in facilitating sanctions evasion, particularly in relation to the re-export of dual-use goods. Despite recent efforts to regulate trade more strictly, challenges remain in ensuring full compliance. Government initiatives to combat corruption and promote fair competition are hindered by a lack of enforcement, ongoing political interference, and a judiciary that lacks the independence needed to hold economic actors accountable.

CIVIL SOCIETY AND SOCIAL PROTECTION

Kyrgyzstan has taken steps to improve victim and witness protection through cooperation with international organizations such as the OSCE. An office for witness protection exists within the interior ministry, but operational transparency is limited. NGOs have a critical role in delivering services to victims of trafficking and other organized crime, offering legal, psychological and medical support. However, gaps in victim identification, inconsistent application of protection procedures, and inadequate shelter services – particularly for male and child victims – remain pressing issues. Victims often face pressure to withdraw complaints, and many are penalized for crimes committed under coercion. Recent legislative changes, including laws that restrict foreign funding and increase reporting requirements for NGOs, may undermine the work of victim support organizations, raising further concerns about the erosion of protective infrastructure.

Although Kyrgyzstan has adopted a national action plan to combat human trafficking and maintains awareness campaigns, prevention efforts are hindered by underfunding and limited institutional capacity. The labour inspectorate faces legal constraints that limit its ability to conduct unannounced inspections, and penalties are inconsistently enforced. The Center for Employment of Citizens Abroad, supported by international partners, provides migrants with information on safe employment and pre-departure training, contributing to trafficking prevention. Nonetheless, the absence of a unified data system and poor coordination across agencies limit the government's ability to measure and improve the effectiveness of these programmes. The country's drug policy is also challenged by limited harm reduction services, high drug use rates and human rights concerns in enforcement practices. Laws to protect whistle-blowers exist on paper but are not enforced, and those reporting corruption often face retaliation. Despite the existence of prevention strategies, gaps in implementation and the lack of state-led initiatives hinder systemic progress in addressing root causes of trafficking and drug-related vulnerabilities.

Civil society activity in Kyrgyzstan is becoming increasingly constrained. Journalists, human rights defenders and minority advocates operate under growing threats, including harassment, detention and legal prosecution. Recent legislation expands government oversight of NGOs and media outlets that receive foreign funding and engage in broadly defined 'political activities'. Press freedom has declined in recent years, with several journalists arrested or convicted for covering opposition protests or publishing content critical of the government. Convictions based on vague laws concerning the dissemination of false information have been condemned by international human rights organizations. Media diversity is also declining, especially among outlets publishing in Uzbek or Russian. Despite this, NGOs continue to provide vital services, including assisting trafficking victims and human rights advocacy. However, their reliance on international funding and the increasing

regulatory burden threaten their sustainability. The space for independent voices is shrinking, as legal and informal pressures converge to limit dissent, raising concerns about the long-term viability of civil society.

This summary was funded in part by a grant from the United States Department of State. The opinions, findings and conclusions stated herein are those of the authors and do not necessarily reflect those of the United States Department of State.