

Strengthening the Role of Authorized Bodies in the Legal Regulation of Civilian and Service Weapons Circulation

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The adoption of the Law of the Republic of Uzbekistan "On Weapons" established the legal basis for the licensing and permitting system in the sphere of weapons circulation. The introduction of this system significantly strengthened state regulation of relevant legal relations and led to a significant increase in both the types of weapons permitted for civilian circulation and the number of permits. At the same time, the workload of employees of the control and licensing units of internal affairs agencies, as well as of employees of public order protection units (*hereinafter referred to as PLOPS employees*) and prevention inspectors, who are responsible for state and departmental oversight functions in this area, has increased significantly.

As a result of established practice, a number of organizational and legal problems have been identified related to ensuring that weapons owners comply with the validity periods of their permits for storage and carrying, as well as with the effective organization of departmental control.

Before the adoption of the Law on Weapons, POOP officers were authorized to issue permits to individuals and legal entities primarily for the circulation of two types of weapons, although in practice, six types of permits were issued. After the Law came into force, the number of weapons placed into circulation increased by 14, bringing the total number of permit types to 19.

Furthermore, following the adoption of the Law, the number of civilian gun owners increased significantly (by 5,047), the number of weapons in their possession increased by 8,207, and the number of weapons subject to mandatory registration and control increased by 6,428. These processes were accompanied by an increase in the average annual turnover of weapons by citizens (from 5,075 to 7,686 transactions) and an increase in the number of meetings with individuals and legal entities regarding weapons turnover (from 19,984 to 23,155).

This dynamic indicates an expansion of the circle of participants in the relevant legal relations and a significant complication of the tasks of state regulation and control, which has objectively increased the burden on authorized bodies and necessitated further improvement of the regulatory framework, organizational mechanisms, and law enforcement practices.

In order to improve the effectiveness of state and departmental control over the circulation of items and substances that pose a danger to human life and health, as well as to strengthen the liability of individuals and legal entities, large-scale legal reforms have been consistently implemented in recent years.

A significant step in this process was the adoption in 2022 of Law No. ZRU-772 ¹, which introduced significant changes and additions to the Code of the Republic of Uzbekistan on Administrative

¹ Law of the Republic of Uzbekistan "On Amendments and Additions to Certain Legislative Acts of the Republic of Uzbekistan in Connection with the Improvement of the Legislation on Weapons," dated May 31, 2022, No. 3PY-772, National Legislation Database, June 1, 2022, No. 03/22/772/0460).

Responsibility (*hereinafter referred to as the AOC*) , the Criminal Code and the Law “On Weapons”².

In particular, administrative liability was established for the illegal circulation of pneumatic, signal, throwing weapons and self-defense weapons (Article 220¹ of the Administrative Code);

a clear definition of the main parts of firearms has been introduced into the Criminal Code and liability standards for their illegal circulation have been established;

The minimum age for owning a hunting weapon has been raised from 21 to 25 years; a ten-year period of ownership for owning certain types of high-power firearms has been established; the permit system has been extended to all types of pneumatic weapons;

The magazine capacity of firearms has been reduced from 10 to 5 rounds; a temporary ban on gun ownership has been introduced for persons convicted of serious and especially serious crimes;

Lists of illnesses and defects that prohibit gun ownership have been approved, and mandatory training courses on gun safety have been introduced for first-time gun owners.

The implementation of these measures was aimed at restricting access to weapons for individuals posing a potential public danger and at reducing the level of weapons risks.

According to statistics, the number of gun-related accidents showed an increasing trend in 2020–2023 (4, 5, 7 and 10 cases, respectively) , stabilized in 2024 (9 cases) and decreased significantly in 2025 (2 cases).

At the same time, there are still instances of violations committed in the sphere of circulation of civilian and service weapons and ammunition, as well as cases of failure by owners of hunting weapons to comply with the rules for the safe handling of them, which indicates the need for further improvement of legal and organizational control mechanisms.

Over the past five years, 62 incidents involving the storage and use of civilian hunting weapons have been recorded, 34 of which were due to negligence, and 10 crimes (*including six murders and attempted murders and four cases of bodily harm*) were committed using hunting weapons. The deaths of 26 citizens as a result of these incidents confirms the high social and legal significance of this issue.

A telling incident occurred in 2025 in the Khorezm region, when the owner of a hunting weapon, while intoxicated, committed a serious crime during a family conflict, resulting in the death of a person and causing serious bodily harm to other family members.

Of particular concern is the high prevalence of offences related to non-compliance with the rules of registration, re-registration of weapons and renewal of permits.

Thus, according to the results of the analysis for the period from 2020 to 2024 and for 10 months of 2025, the total number of offenses provided for in Articles 185, 220, 220¹ and 221 of the Code of Administrative Offenses amounted to 77,047 cases, of which 74,079 (96.1%) were violations related specifically to non-compliance with registration and permitting requirements.

Thus, the conducted analysis allows us to conclude that the current arms control system contains a number of organizational and legal shortcomings, manifested in a disproportion between the scope of administrative measures and their actual preventative effectiveness. A discrepancy persists between the scope of sanctions and their deterrent and educational function, requiring further improvement of administrative and legal enforcement mechanisms. In particular,

²Code of the Republic of Uzbekistan on Administrative Responsibility, National Legislation Database, No. 03/25/1080/0710; 22.08.2025, No. 03/25/1083/0769; Criminal Code of the Republic of Uzbekistan, National Legislation Database, 09.08.2025, No. 03/25/1080/0710; Law of the Republic of Uzbekistan "On Weapons," dated 29.07.2019 No. ZRU-550, National Legislation Database, 07.02.2024, No. 03/24/905/0106.

Firstly, in accordance with current regulations,³ employees of public order protection units (POPU) in the sphere of circulation of weapons and other dangerous substances carry out a range of licensing, control and preventive functions, which include:

- a) issuance of licenses and permits in the field of arms circulation;
- b) control over compliance with the requirements and conditions of issued licenses and permits;
- c) conducting inspections of places where weapons are stored and used, drawing up reports on identified violations and making decisions requiring their elimination;
- d) suspension, renewal and cancellation of licenses and permits in accordance with the established procedure;
- e) prevention of crimes and offenses in public places, ensuring security during mass events, as well as organizing escort activities;
- f) implementation of licensing and control in the sphere of circulation of explosive materials and pyrotechnic products;
- g) issuing permits for the production of seals with the image of the State Emblem, as well as receipts for their destruction;
- h) preparation of conclusions on the compliance of storage locations for narcotic drugs, psychotropic substances, their analogues and precursors with established requirements.

Thus, the powers of the PPOOP employees cover a wide and complex range of tasks related not only to the circulation of civilian weapons, but also to the handling of explosives, pyrotechnics and narcotic substances, as well as to ensuring public safety in general.

Moreover, an analysis of the dynamics of official activity indicates a consistent and significant increase in the volume of control functions and public services performed by PPOOP employees. Thus, between 2020 and 2024, the number of registered objects increased from 1,768 to 2,005 units, the number of public services rendered increased from 7,835 to 13,526, the number of escorts for interregional transportation of explosive materials increased from 945 to 1,173, and the number of receptions of individuals and legal entities increased from 5,984 to 9,651. These indicators objectively confirm the trend of increasing official workload and increasing complexity of tasks.

The data presented demonstrates that the workload of PPOOP officers is consistently increasing and is multidisciplinary, extending beyond weapons control to encompass other socially and publicly dangerous areas. PPOOP inspectors are also actively involved in public safety activities: while in 2019 they participated in 109,977 mass events, in 2024 this figure reached 189,592. Furthermore, in the area of environmental protection, the number of preventive measures increased from 5,734 in 2019 to 8,611 in 2024, further confirming the trend toward expanding the functional workload and increasing the complexity of PPOOP officers' professional tasks.

At the same time, by the 2022 Cabinet of Ministers Resolutions No. 80 (Appendix No. 34 to the Regulation) and No. 86 (Appendices No. 46 and 47 to the Regulation), the PPO employees are vested with the authority to issue licenses and permits for the circulation of weapons, verify compliance with their terms, inspect weapons circulation facilities, draw up reports on identified

³The Law of the Republic of Uzbekistan "On Weapons" dated July 29, 2019, No. ZRU-550, National Legislation Database, February 7, 2024, No. 03/24/905/0106; the Law of the Republic of Uzbekistan "On Licensing, Permitting and Notification Procedures" dated July 14, 2021, No. ZRU-701, National Legislation Database, May 17, 2025, No. 03/25/1063/0445; and the Law of the Republic of Uzbekistan "On Internal Affairs Bodies" dated September 16, 2016, No. ZRU-407, National Legislation Database, December 2, 2024, No. 03/24/1008/0988; Resolution of the Cabinet of Ministers of February 21, 2022 No. 80 "On Approval of the Unified Regulation on the Procedure for Licensing Certain Types of Activities through a Special Electronic System" (Appendix No. 34 to the Regulation), National Legislation Database, September 16, 2025, No. 09/25/584/0830, and Resolution of February 22 No. 86 "On Approval of the Unified Regulation on the Procedures for Issuing Certain Permitting Documents through a Special Electronic System" (Appendices No. 46 and 47 to the Regulation), National Legislation Database, August 27, 2025, No. 09/25/538/0782.

violations, make decisions on their elimination, as well as suspend, renew and cancel licenses and permits.

However, POOP officers are not authorized to draw up administrative protocols under Articles 185, 220, and 220¹ of the Code of Administrative Offenses, nor to review administrative cases under Article 221 of the Code of Administrative Offenses. In practice, administrative cases under these articles are reviewed by courts, heads of district (city) internal affairs agencies, heads of transport safety departments, and prevention inspectors.

According to Part 3 of Article 40 of the Law of the Republic of Uzbekistan "On Weapons," the responsibility for annually inspecting compliance with civilian weapons storage regulations falls to (senior) prevention inspectors of internal affairs agencies. However, their primary activities include working with the public, reviewing appeals and complaints, preparing and submitting materials to court on offenses committed in mahallas, and implementing general and individual prevention measures.

At the same time, the scope of their authority and workload has increased significantly. While in 2019, prevention inspectors directly reviewed cases under 17 articles of the Code of Administrative Offenses and referred materials to court under 70 articles, the number of articles they directly review has now increased to 24, and the number of articles for which materials are referred to court has exceeded 100.

Law enforcement practice shows that the current model of authority distribution creates a number of organizational and procedural problems. Specifically, when detecting weapons violations, a firearms inspector is forced to call a prevention inspector to draw up an administrative report. When the latter are heavily loaded or located remotely, prompt response is hampered, resulting in unnecessary time expenditures and reduced enforcement effectiveness.

Moreover, in some cases, the special regime of protected facilities requires additional approval for the access of a preventive inspector, which also negatively impacts the efficiency and effectiveness of law enforcement activities.

Secondly, A significant factor negatively impacting the effectiveness of administrative and legal enforcement in the area of arms trafficking is the relatively low level of the penalty stipulated by Article 221 of the Code of the Republic of Uzbekistan on Administrative Responsibility, as well as its long-standing inconsistency. Initially, the penalty under this article, adopted in 1994, stipulated a fine of one-tenth to one-half the minimum wage (10-50 soums). Subsequently, despite the replacement of the "minimum wage" category with the "basic calculated value" (hereinafter, BCA) in 2019, the content of the provision and the amount of the fine remained essentially unchanged. Currently, the fine under this article ranges from one-tenth to one-half the BCA, i.e., from 41,200 to 206,000 soums, which objectively does not correspond to the level of public danger posed by arms trafficking offenses.

A comparative legal analysis of the legislation of CIS member states reveals a significantly more stringent approach to administrative liability for similar offenses. Thus, in accordance with Article 486 of the Code of the Republic of Kazakhstan on Administrative Offenses⁴ (2016 edition) For violation of the rules for registration (*re-registration*) of weapons or renewal of permits for individuals, a fine is established in the amount of 15 times the monthly calculation index (MCI), which is 58,980 tenge (*approximately 109.5 US dollars or 1,356,540 soums*). For legal entities, the penalty ranges from 20 to 40 MCI, that is, from 78,640 to 157,280 tenge (*approximately 146.0–292.1 US dollars or 1,808,720–3,617,440 soums*).

It should be noted that prior to the 2016 reform, sanctions in the Republic of Kazakhstan were also relatively lenient: fines for individuals were 5 MCIs, while for legal entities, they ranged from 10 to

⁴ Code of the Republic of Kazakhstan on Administrative Offenses dated July 5, 2014 No. 235-V , https://kodeksy-kz.com/ka/ob_administrativnyh_pravonarusheniyah.htm;

40 MCIs. However, as a result of the administrative legislation reform, fines for individuals were tripled, significantly enhancing the deterrent effect of administrative liability.

A similar approach is evident in the legislation of the Republic of Belarus. In the new version of the Code of Administrative Offenses ⁵, adopted in 2006 and effective since 2007, the fine for violating weapons registration rules was increased from 5–20 rubles to 4–15 times the base amount (*168–630 rubles, equivalent to approximately \$50.8–190.40 or 640,752–2,402,820 soums*). ⁶In the subsequent version of the Code of Administrative Offenses of 2021, these fine amounts were retained, demonstrating the stability and consistency of the chosen legal regulation model.

Tougher administrative penalties for similar offenses are also being observed in the Kyrgyz Republic. The new Code of Offenses ⁷, adopted in 2021, significantly increased fines for violating rules for registering and renewing weapons permits: for individuals, from 1 to 30 times the calculated fine, and for legal entities, to 130 times the calculated fine. These changes were aimed at enhancing the legal effectiveness and strengthening the preventive impact of administrative law.

A comparative legal analysis has led to the conclusion that the fines stipulated by the legislation of the Republic of Uzbekistan for violating the rules for registering (re-registering) weapons or extending the validity of permits remain among the lowest among CIS member states, which reduces their preventive value.

It should be noted that minimum fines ranging from one-tenth to one-half of the minimum monthly wage are also provided for under a number of other articles of the Code of Administrative Offenses (*Articles 87, 102, 115, 118, 143, 144, 149, 168, 231–233, 235, and 236*), aimed at preventing potential threats to public safety. In establishing minimum penalties, the legislator clearly takes into account the socioeconomic status of various segments of the population.

At the same time, civilian weapons circulation is objectively linked to the financial resources of their owners. Legally acquiring and storing weapons, participating in hunting activities, and creating the necessary infrastructure require significant financial outlays. Thus, the initial costs for a citizen to obtain hunter status and legally acquire a weapon exceed 6 million soums ⁸, with annual expenses averaging 1.6–2 million soums ⁹, and recurring costs of approximately 494,000–638,000 soums ¹⁰.

Thus, in the first year, a citizen spends at least 6 million soums, and in subsequent years, over 2 million soums annually. These circumstances indicate that the minimum administrative fine is not proportionate to the actual financial situation of gun owners and does not fully serve its preventative function.

⁵ Code of the Republic of Belarus on Administrative Offenses January 6, 2021 No. 91-Z, <https://etalonline.by/document/?regnum=hk2100091>.

⁶The cost of fines of the specified foreign countries in US dollars, calculated as of October 30, 2025.

⁷Code of the Kyrgyz Republic “On Offenses” dated October 28, 2021 No. 128, Article 133. Violation of the rules for storing or transporting firearms, gas, pneumatic, throwing and electric weapons or ammunition for them, electron manbaa - <https://cbd.minjust.gov.kg/3-36/edition/26794/ru>;

⁸Initial (*one-time*) costs - to obtain a hunting license - 824,000 soums (*2 BRV; for pensioners and disabled persons of group II - 412,000 soums*); training on courses on safe handling of weapons (*for first-time gun buyers*) - 550,000 soums; Permit to purchase 1 unit of firearm - 164,800 soums (*40% of the BRV*); 1 used firearm - over 1,500,000 soums; new ordinary smooth-bore weapon of Russian manufacture - over 3,000,000 soums; foreign-made weapons - over 5,000,000 soums; safe or metal cabinet for storing weapons - over 2,000,000 soums; purchasing an average of 50 cartridges - from 175,000 to 3,000,000 soums (*the price of a cartridge, depending on the type, is from 3,500 to 60,000 soums*).

⁹Annual expenses - fee for more than one type of hunting weapon (*smooth-bore weapon, rifled barrel or pneumatic*) - 412,000 soums (*1 BRV*); hunting expenses - 1,225,000 - 1,625,000 soums (*hunting direction - not less than 300,000 soums; purchase of an average of 50 cartridges - 625,000 soums; transportation and food expenses - 300,000 - 500,000 soums*). One hunt provides for shooting of at least 10 pigeons (*5,000 soums each*), 5 ducks (*18,000 soums each*), 5 pheasants (*30,000 soums each*) and 1 rabbit (*40,000 soums each*).

¹⁰Recurring expenses - renewal of a hunting license once every 2 years - 412,000 soums (*206,000 soums for pensioners and disabled persons of group II*); renewal of a permit to store and carry weapons once every 3 years - for 1 unit of weapon - 82,400 soums (*20% of the minimum wage*); for a person storing 3 types of weapons - 226,600 soums.

International experience shows that in a number of countries (*USA, Canada, UK, Singapore, and European Union countries*), failure to renew permits or failure to register weapons is classified not as a formal administrative offence, but as illegal possession of weapons, which entails stricter penalties.

In particular, such acts are considered criminal offenses under US, Chinese, and Singaporean law. In EU countries, they entail administrative or criminal liability, with large fines or imprisonment.

Thus, according to the Firearms Act 1968 (Section 1) of the UK, possession of an unregistered weapon is punishable by a fine of up to £5,000 or imprisonment for up to six months.¹¹

This practice confirms that strict and inevitable penalties are an effective tool for preventing offenses and crimes related to weapons trafficking. Given that the primary goal of administrative penalties is to instill in offenders a sense of inevitability and deter them from repeat offenses, improving the effectiveness of sanctions is crucial.

In order to eliminate the identified problems, it seems appropriate to make the following changes to the Code of Administrative Offences:

1) to empower officials of public order protection units to draw up administrative protocols under Articles 185, 220 and 220¹ of the Code of Administrative Offences, as well as to consider cases under Article 221;

2) increase the fine provided for in Article 221 of the Code of Administrative Offences from one to five basic units of taxpayer value, which will enhance the preventive effect of the regulation.

It should be noted that, in order to optimize the workload of PPO employees, digitalization of public services is currently being actively implemented.

Thus, the Public Order Protection Service of the Ministry of Internal Affairs has developed and implemented in test mode the information system for control and licensing activities "E.IIV.Licenziy", designed to provide government services in the area of circulation of weapons and explosives through the secure electronic platform MY.GOV.UZ.

The system includes the subsystems "Government Services," "Statistics," and "Risk Analysis," and provides automatic monitoring of permit expirations, advance notification of gun owners, and automated generation of administrative documents upon permit expiration.

To this end, Cabinet of Ministers Resolution No. 67 of 2025¹² amended Government Resolutions No. 80 and No. 86 of 2022 to provide public services through the Special Electronic System.

At the same time, a rule was introduced prohibiting the disclosure by participants in the process of information contained in documents for issuing a permit to other persons.

The adoption of relevant legislative changes, coupled with the digitalization of inspection and licensing activities, will contribute to increased effectiveness of state control, reduce the burden on firearms inspectors, and foster a strong respect for the law among gun owners.

¹¹ https://www.legislation.gov.uk/ukpga/1968/27/section/1/enacted?view=plain&utm_source=chatgpt.com .

Comparison with the exchange rate (in Uzbekistani soums) - as of November 30, 2025 - 1 British Pound (GBP) \approx 15,750 - 16,200 Uzbekistani soums (UZS). Accordingly: 5,000 £ \times 15,750 - 16,200 \approx 78,750,000 - 81,000,000 Uzbekistani soums.

¹² Resolution of the Cabinet of Ministers of the Republic of Uzbekistan dated 02/07/2025 No. 67 "On Amendments and Supplements to Certain Decisions of the Government of the Republic of Uzbekistan" (National Legislation Database, 02/15/2025, No. 09/25/67/0145) .