

The regulatory framework governing trade activities in the Republic of Uzbekistan (hereinafter referred to as “**Uzbekistan**”) has undergone significant amendments designed to strengthen consumer protection mechanisms. Below is an overview of the key developments.

I. The Government has approved new regulations governing promotional campaigns and discounts in retail trade.

By Resolution of the Cabinet of Ministers of Uzbekistan No. 662 dated October 21, 2025 (hereinafter referred to as the “**Resolution No. 662**”), amendments and additions have been introduced to a number of regulatory acts, including the Rules of Retail Trade of Uzbekistan approved by Resolution No. 75 dated February 13, 2003 (hereinafter referred to as the “**Trade Rules**”).

The draft of the new procedure for regulating promotional campaigns and discounts in retail trade was initiated by the Competition Promotion and Consumer Protection Committee (hereinafter referred to as the “**Competition Committee**”) in July 2025.

Under the amendments, Clause 3 of the Trade Rules is supplemented with the following new definitions:

Promotional Campaign – advertising in the form of an event, contest, or game that encourages consumers to take certain actions, including participation conditioned upon receiving the advertised product;

Price List – information indicating the final price set for a unit of goods or a specific quantity of goods, typically offered to the consumer without any conditions, in a single copy and clearly stated;

Discount Price – a price at which the cost of goods is reduced by a certain percentage or amount from its pre-discount price;

Pre-Discount Price – the lowest price set for a unit of goods, typically offered to the consumer within 30 days prior to the announcement of the discount price, which must be confirmed by the seller.

In addition, the Trade Rules have been supplemented with a new Chapter XVII⁴ governing the regulation of promotional campaigns and discounts.

Under the new requirements, when applying a discount to the price of goods, the seller must:

- Indicate the pre-discount price (except for agricultural products). Failure to do so will be deemed a price reduction rather than a discount;
- Avoid artificially inflating prices prior to announcing discounts;
- Maintain records of goods and prices, including price history for the last 30 days, and provide this information to consumers upon request.

Furthermore, when announcing a promotional campaign, the seller is required to:

- Clearly and transparently communicate its terms to consumers, including duration, list of goods, quantities, and purchase conditions;
- Refrain from altering the terms of the campaign after its announcement or providing misleading information;
- Ensure actual compliance with all declared discounts, bonuses, and benefits under the campaign;
- Maintain sufficient stock of goods included in the campaign for its entire duration.

In addition, retailers should also take into account the following requirements:

- When conducting a promotional campaign in the form of a mass event, the established procedures must be observed, and prior authorization must be obtained from the internal affairs authorities;
- When processing personal data of campaign participants, compliance with personal data legislation is mandatory, and consumers must be informed of the purposes and conditions of data processing.

II. The Government has approved regulations on prescription medicines and abolished price controls for over-the-counter medicines and medical devices.

The Resolution No. 662 also introduces amendments to Cabinet of Ministers Resolution No. 185 dated April 6, 2017, “On Measures to Implement the Law of the Republic of Uzbekistan dated January 4, 2016, No. 399 ‘On Amendments and Additions to the Law of the Republic of Uzbekistan ‘On Medicinal Products and Pharmaceutical Activity’” (hereinafter referred to as the “**Resolution No. 185**”).

Under the amendments, the scope of price regulation has been narrowed. Price controls now apply exclusively to prescription medicines in both wholesale and retail sales. All previous references to “medicines and medical devices” have been replaced with “prescription

medicines.” Accordingly, references to medical devices have been removed, and the mechanism for determining prices for imported prescription medicines has been clarified.

Restrictions on trade mark-ups for Prescription Medicines remain in force.

In addition, wholesale and retail prices for Prescription Medicines must not exceed the established reference price limits.

Another significant change is the transfer of control functions for compliance with legislation governing wholesale and retail sales of medicines from the previously authorized body, the Agency for the Development of the Pharmaceutical Industry under the Ministry of Health of the Republic of Uzbekistan, to the state institution “Center for Pharmaceutical Product Safety.”

III. The President introduces measures to strengthen liability for selling expired or improperly labeled food products

On October 6, 2025, the President of the Republic of Uzbekistan, Shavkat Mirziyoyev, signed Resolution No. 296 (hereinafter referred to as the “**Resolution No. 296**”), which provides for enhanced control over the quality and safety of food products and the implementation of modern mechanisms for consumer protection.

Under the Resolution No.296, starting March 1, 2026, the sale of expired products will be restricted through the digital labeling system “Asl Belgisi.” Cash register systems will not allow receipts to be issued for products past their expiration date. Currently, labeling requirements apply to tobacco and alcohol products, medicines, water and beverages, mineral fertilizers and chemicals, among others.

In addition, from October 15, 2025, to January 1, 2027, a pilot procedure will be introduced under which consumer complaints and test purchases will be handled by non-governmental non-profit organizations (hereinafter referred to as “**NGOs**”). Employees of such NGOs must hold a special certificate confirming completion of training courses at the Center for Research on Competition Policy and Consumer Rights under the Competition Committee.

The Resolution No.296 also approves the Competition Committee’s proposal to strengthen administrative liability for the sale of food products:

- with expired shelf life;
- without indication of the production date and/or expiration date, where such labeling is mandatory.

Previously, Article 178 of the Administrative Liability Code of Uzbekistan provided for fines ranging from **3 to 10 BRV** (approximately UZS 1.2–4.2 million) for individuals and **7 to 10 BRV** (approximately UZS 2.8–4.2 million) for officials. Following the amendments, the upper limit of the fine for both individuals and officials will be **30 BRV** (approximately UZS 12.3 million).

To facilitate the submission of consumer complaints and enable prompt responses, the Competition Committee will launch the “Consumer Complaint” information system on December 1, 2025. This platform will allow monitoring of complaint handling at all stages.

The system will be integrated with the personal account of the Tax Committee, enabling entrepreneurs to receive real-time notifications of consumer complaints.

Under the new procedure:

- Initial review of complaints must be carried out by entrepreneurs within 10 calendar days, under the supervision of the Competition Committee;
- If the entrepreneur fails to remedy the violation or provide a reasoned response, the complainant may:
 - submit the complaint to the Competition Committee; or
 - contact a consumer protection organization.

If the entrepreneur does not eliminate the violation within 10 days, the organization may, through the system, escalate the complaint to the Competition Committee or file a claim in court.

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