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FROM REFORM CONVERGENCE TO DELIVERY: WATER GOVERNANCE AS A TEST OF REGIONAL COOPERATION IN CENTRAL ASIA

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ABSTRACT. *Central Asia has never been better positioned to solve its water problems on paper. Since 2016, political rapprochement among the five states has been accompanied by the adoption of strikingly similar national water reforms built around integrated water resources management, basin governance, digitalization, and cost recovery, supported by international finance. Yet the 2021 drought caused heavy agricultural losses in four of the five countries, and the region remains unprepared for the next dry cycle. This paper asks why the convergence of reform agendas has not produced water security, and what the answer implies for the regional cooperation agenda. It develops a three-stage analytical framework that follows reforms from adoption, through translation into administrative and financial practice, to performance under climatic stress, and applies it to evidence from document analysis of national strategies and legislation, longitudinal field engagement since 2005, and expert interviews across the five countries. The analysis shows that convergence is produced at the adoption stage by transnational template diffusion, regional political incentives and centralized executives, while a delivery gap opens at the translation stage, where incomplete asset ownership, politically constrained tariffs and a financing shortfall of roughly 40-45 percent of estimated needs leave reformed institutions without operational capability. Dry years then expose this gap and transmit its costs across borders through shared basins. The paper concludes that domestic delivery capability has become a regional security variable, and that the cooperation agenda should shift from declaratory alignment toward regional public goods: harmonized indicators, dry-year protocols, seasonal drought information and jointly prepared investments anchored in existing institutions.*

KEYWORDS: *Central Asia, water governance, regional cooperation, policy implementation, water financing, drought, regional public goods.*

1. INTRODUCTION

In the summer of 2021, a severe drought moved across Central Asia; soil-moisture deficits were among the most severe of the past seventy years and vegetation productivity fell across the region (Jiang & Zhou, 2023; Guo et al., 2024). In the Chuy region of the Kyrgyz Republic, river flows fell to less than half of the norm, canals ran dry, and farmers picketed the Government House in Bishkek and blocked the Bishkek-Osh highway (Thompson, 2021; Kaktus.media, 2021). In Kazakhstan, drought killed livestock in Mangystau and Kyzylorda provinces on a scale that official tallies put at more than 1,700 head and the President at 3,000 in Mangystau alone; a state of emergency was declared in Kyzylorda's Aral district, and the government banned feed exports (Kumenov, 2021; Prime Minister of the Republic of Kazakhstan, 2021;

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International Federation of Red Cross and Red Crescent Societies [IFRC], 2021, 2022). Downstream, the combined annual flow of the Amu Darya and Syr Darya reached only 84 percent of the long-term average, Turkmenistan and Uzbekistan received roughly a third less water than required in the lower Amu Darya, and winter-cereal yields fell below average in western Uzbekistan and most of Turkmenistan (Scientific Information Center of the Interstate Commission for Water Coordination [SIC ICWC], 2022; European Commission Joint Research Centre, 2021). Little about the event resembled the water crisis that three decades of scholarship had prepared the region for. It produced no interstate confrontation over allocation and no upstream-downstream standoff, and the transboundary institutions inherited from the early 1990s continued to function. The losses were produced largely inside the states, by monitoring that did not reach decisions, by irrigation systems that lose between a third and, in some cases, more than half of the water diverted into them, and by responses financed after the damage was done.

The episode is puzzling because it occurred at a moment when the formal conditions for water security in Central Asia had never looked better. Since 2016, political rapprochement among the five states has produced regular consultative meetings of the heads of state, progress on border delimitation, growing intra-regional trade and joint infrastructure initiatives such as the Kambarata-1 hydropower project, for which the energy ministries of Kyrgyzstan, Kazakhstan and Uzbekistan signed a roadmap in January 2023 and an agreement on joint preparation in June 2024, with an intergovernmental agreement under negotiation (Kaktus.media, 2023; Gazeta.uz, 2024; World Bank, 2024, 2025). In the same period, all five governments adopted remarkably similar water reform packages, centered on integrated water resources management (IWRM), basin governance, digitalization and cost recovery, despite marked differences in their political institutions, fiscal capacities and positions in the shared basins. International financial institutions stood ready to fund these agendas. Alignment of politics, policy and finance of this kind is rare in any region.

This paper asks why such convergence has not produced water security, and what the answer implies for the regional cooperation agenda. The question is strategic rather than technical. If the obstacle to water security were the absence of agreed reform models, the remedy would be more alignment, more declarations and more strategies, which is what the region has been producing. If, as this paper argues, the obstacle lies elsewhere, in the capacity of states to translate adopted reforms into administrative and financial practice and to perform under climatic stress, then the cooperation agenda needs different content.

The argument is developed in three steps that correspond to the stages of a reform's life. At the adoption stage, the paper explains the convergence itself: transnational template diffusion, regional political incentives, and centralized executive advocacy have aligned what the five states commit to on paper. At the translation stage, it locates the delivery gap: incomplete asset ownership, unenforceable maintenance obligations, politically constrained tariffs, and a financing shortfall of roughly 40–45 percent of estimated needs (Section 4.2; Abdullaev & Akhmedov, 2023; Vinokurov et al., 2023) leave reformed institutions without the operational and financial capability their mandates assume. At the response stage, it shows how recurrent drought exposes this gap and transmits its costs across borders through the shared Amu Darya and Syr Darya systems, in which Afghanistan, a riparian outside the regional allocation framework, is becoming an active user, converting national delivery failures into regional stresses. The conclusion that

follows is that domestic delivery capability has become a regional security variable, and that the most productive use of the current political window is the joint production of regional public goods that make delivery visible, comparable, and financeable.

The paper is organized as follows. Section 2 reviews the literature and identifies the gap the paper addresses. Section 3 presents the analytical framework and research methods. Section 4 traces the evidence through the three stages of the framework. Section 5 discusses the implications for regional cooperation, and Section 6 concludes.

2. LITERATURE REVIEW

Three bodies of research bear on the question, and each explains part of the picture while leaving the connection between them unexamined.

The first is the literature on Central Asian hydro-politics. Early post-Soviet scholarship treated the division of the Amu Darya and Syr Darya basins among states with opposite seasonal interests as a source of probable conflict (Weinthal, 2006; Pena-Ramos et al., 2021), and the securitization of large infrastructure kept this frame alive for two decades. A second generation examined the institutions through which the region has in practice managed its shared waters: the Interstate Commission for Water Coordination, the basin water organizations, and the International Fund for Saving the Aral Sea have operated continuously since 1992, and IWRM was promoted regionally as a survival strategy under scarcity (Dukhovny et al., 2013; Wegerich et al., 2015). Assessments of these institutions document real weaknesses in data exchange, enforcement, and financing, but also their persistence through periods of serious political tension (Ziganshina & Sehring, 2021; Zhupankhan et al., 2018). Conflict predictions failed. However, the institutional record tells us little about whether states can deliver water services within their own borders, where the 2021 losses originated.

The second body of work concerns the domestic transformation of water management. Studies of Water Users Associations documented the difficulty of transplanting participatory irrigation management into post-collective agriculture (Yalcin & Mollinga, 2007; Sehring, 2009). Research on path dependency and institutional bricolage showed that reform outcomes are shaped by Soviet administrative legacies as much as by reform design (Sehring, 2009; Amirova et al., 2022), and the concept of the hydraulic mission explains the persistence of construction-oriented bureaucracies (Molle et al., 2009; Abdullaev & Rakhmatullaev, 2013). Systems and co-evolutionary perspectives interpreted the sector as an interdependent configuration of institutions, infrastructures and discourses (Djanibekov et al., 2016; Van Assche et al., 2014). Comparative assessments spanning the whole region remain less common than single-country studies (Abdullaev & Atabaeva, 2012; Karthe et al., 2017; Sehring et al., 2024). This literature explains why implementation is hard, but it has engaged little with how implementation failures travel across borders in shared basins.

The third literature addresses water finance. International research has established the principles of investment needs assessment, tariff design, cost recovery, blended finance and private participation (Ward, 2010; Winpenny, 2015; OECD, 2018, 2019; World Bank, 2023), and economic analysis has clarified why irrigation pricing cannot be separated from service reliability and institutional credibility (Hellegers & Perry, 2006; Dinar & Tsur, 2021). Frameworks of policy change, notably the Kaleidoscope Model, explain how standardized reform packages travel across developing countries through

donors and policy champions (Resnick et al., 2015, 2018; Mahoney & Thelen, 2010). Applied to Central Asia, however, this work has mostly asked how much investment the region needs, not why three decades of reform have failed to produce the governance conditions under which investment becomes sustainable.

These three bodies of work are not sealed compartments, and several strands have already crossed the boundaries between them. Research on the water-energy-food nexus has linked upstream hydropower, downstream irrigation and food security into basin-wide accounts (Granit et al., 2012; Jalilov et al., 2016; Keskinen et al., 2016; Abdullaev & Rakhmatullaev, 2016). Work on hydro-hegemony and transboundary governance has shown how material power, ideas and donor programs shape bargaining between riparians (Wegerich, 2008; Zinzani & Menga, 2017; Menga, 2018). Multi-level and politics-of-scale analyses have traced how national reforms are reworked at district and local levels (Sehring, 2009; Zinzani & Bichsel, 2018), and studies of border regions, above all the Ferghana Valley, have shown that conflict and cooperation coexist across local, provincial and interstate levels in physically interlocked canal systems (Bichsel, 2009; Wegerich et al., 2012; Pak et al., 2014; Soliev et al., 2015). A further strand has examined the relationship between local water users and the state and regional institutions above them, from water user associations to basin organizations (Abdullaev et al., 2010; Wegerich, 2010; Hamidov et al., 2015; Zinzani, 2016).

The gap that remains is nonetheless integrative. Hydro-political research, with the exceptions just noted, has been organized around relations between states; governance research has concentrated on implementation difficulty within them; finance research has stopped at the investment gap. None of them connects the adoption of reforms, their translation into administrative and financial practice, and their performance under climatic stress into a single account across all five states, although this chain determines whether the region's current alignment produces water security or merely paper convergence. Constructing and applying such an account is this paper's contribution.

3. ANALYTICAL FRAMEWORK AND RESEARCH METHODS

3.1 Framework: adoption, translation, response

The paper follows reforms through three stages, each anchored in an established literature but connected here into one analytical chain.

The adoption stage covers agenda setting, design, and formal enactment. Following the Kaleidoscope Model of policy change, outcomes at this stage are shaped by focusing events, policy champions, prevailing knowledge paradigms, and the configuration of veto players (Resnick et al., 2015, 2018). The model was developed for developing-country settings in which international organizations and donors shape the policy process, and it treats regime type not as a scope condition but as a variable: it expects fewer veto players and faster enactment in presidential, unitary and less pluralistic systems than in parliamentary or federal ones (Resnick et al., 2018, p. 104), which is precisely the configuration found in Central Asia, and it has since been adapted for agrifood policy analysis in Central and West Asia, including Uzbekistan (Dhehibi et al., 2023). It is used here heuristically, for the adoption stage only, as a checklist of the conditions under which enactment becomes likely, not as a predictive model. Veto players were assessed following Tsebelis (2002) as the institutional and partisan actors

whose formal agreement was required to enact each instrument listed in Table 1, using three indicators: the type of instrument (presidential decree, government resolution, or parliamentary law), the partisan configuration of the legislature where a law was required, and the time elapsed between publication of a draft and enactment. By these indicators, the number of effective veto players was one or two in every country. The strategies and programs that set the reform direction were adopted by presidential decree or government resolution in all five states, and the water codes that followed passed legislatures dominated by pro-presidential parties; in the Kyrgyz Republic, the most pluralistic case, the 2025 Water Code moved from parliamentary adoption on 30 April to presidential signature on 27 June (Kyrgyz Republic, 2025a). The only overt opposition recorded in the documents and interviews concerned tariff adjustments in the Kyrgyz Republic, where veto potential at the adoption and implementation stages was rated medium; in the other four countries it was rated low. Because these variables operate similarly across the five countries, the framework predicts, and Section 4.1 confirms, convergence at this stage.

The translation stage covers what happens after enactment: whether mandates acquire budgets, whether institutions acquire capability, and whether infrastructure acquires sustainable financing. The term is taken from the policy translation literature, which holds that policies do not travel intact but are re-interpreted and re-assembled by the administrative systems that receive them, so that a reform's meaning and content change as it moves from text to practice (Lendvai & Stubbs, 2007; Peck & Theodore, 2010; Stone, 2012; Mukhtarov, 2014). In this paper, translation is defined as the process through which an enacted reform is converted into administrative routines, budget lines, organizational capabilities, and financing arrangements. It is broader than implementation, understood as the execution of a given policy by a given agency, because it includes the fiscal and institutional conditions that make execution possible; implementation capacity is an input to translation, not a synonym for it, and funding is one of its dimensions, not the whole of it. Section 4.2 examines three dimensions: institutional translation, or whether new mandates displace or merely overlay older administrative logics; operational translation, or whether data and rules enter day-to-day decisions; and financial translation, or whether services acquire credible revenues and assets acquire maintenance. To analyze the first dimension, the framework draws on institutional theories of layering and drift, in which new rules are added to older arrangements without displacing their practical logic (layering) or remain formally unchanged while the conditions they govern change (drift) (Hacker, 2004; Streeck & Thelen, 2005; Mahoney & Thelen, 2010; Van Assche et al., 2014). Both are documented in Central Asia. Water user associations in the Kyrgyz Republic and Tajikistan were layered onto district water administrations and the routines of former collective farms, which continued to govern practice (Sehring, 2009); in Uzbekistan, water user associations and hydrographic basin units were added to a hydraulic bureaucracy that retained control over allocation and continued to serve state production targets (Wegerich, 2010; Hamidov et al., 2015; Zinzani, 2016; Zinzani & Bichsel, 2018); and the basin councils created under the water codes of Kazakhstan and the Kyrgyz Republic coexist with, rather than replace, territorial administrations (Zinzani, 2015; Sehring et al., 2024). Drift is visible in irrigation tariffs that stayed fixed at a fraction, by a factor of four to fifteen, of cost-recovery levels while costs, infrastructure age, and hydrological variability changed around them (Vinokurov et al., 2023). For the financial dimension, the framework draws on the concept of financeability: investment becomes sustainable only where assets are identifiable, maintenance responsibilities enforceable,

services measurable, revenues credible and risks allocatable (OECD, 2018; World Bank, 2023). Financeability is not an independent explanatory variable. It is treated here as an outcome of translation: the condition that emerges when institutional and operational translation have gone far enough for a financier to identify an asset, a responsible party and a revenue stream. Its absence is therefore a symptom of the delivery gap rather than a cause of it, and a useful one analytically, because it is observable in investment flows. Because these conditions depend on national administrative and fiscal endowments that differ sharply across the region, the framework predicts divergence at this stage.

The response stage covers performance under stress. Drought is the natural test because it probes every link in the chain at once: monitoring, operational triggers, reservoir and canal management, advisory services, and contingency finance. The stage is analyzed through the interaction of hazard, exposure, vulnerability and response capacity that underpins contemporary drought policy frameworks (Wilhite et al., 2014; Pulwarty & Sivakumar, 2014). In shared basins, response failures become regional when national delivery gaps spill over: consequences move downstream and upstream through allocation, prices, and migration regardless of state borders. The Amu Darya adds a further riparian. Afghanistan, whose territory generates a substantial share of the basin's runoff, is party to neither the 1992 Almaty Agreement nor the Interstate Commission for Water Coordination, and its withdrawals, which are expected to rise sharply once the Qosh Tepa Canal is operating, change the baseline against which the five states' delivery capability will be tested (Kuzmits, 2006; Ilkhamov, 2023; SIC ICWC, n.d.). The framework therefore treats Afghanistan as an exogenous riparian actor: it is not included in the comparison of reform adoption and translation, because it is not part of the regional reform and institutional processes analysed here, but it enters the response stage as a determinant of exposure (Sections 4.3 and 5.3).

The framework thus generates the paper's central expectation: a region can converge at adoption, diverge at translation, and discover at the response stage that the weakest link sets the exposure of all. Section 4 organizes the evidence accordingly.

3.2 Methods and data

The research design is qualitative and interpretive; its purpose is to reconstruct mechanisms rather than to measure effects. Research on the water sector in Central Asia is constrained by limited transparency on budgets, procurement and decision-making, and a triangulated qualitative design is a realistic response to these conditions.

Three evidence streams were combined. The first is document analysis of national water strategies, water codes, laws, presidential decrees and government programs adopted between 2016 and 2025 in the five countries (listed in Table 1 and cited individually in the reference list), together with the program documents of the principal development partners in the sector. The second is longitudinal field engagement: the author has participated in policy dialogues, inter-ministerial meetings and technical missions in the region since 2005, including a 2023 mission with an international financial institution that involved on-site visits to water agencies and ministries in several of the countries, complemented by semi-structured interviews conducted in 2022–2023 with policymakers, water agency leaders and sector experts in all five countries, described in the next paragraph. The third is the author's participation in a regional drought risk and resilience assessment and the associated national drought dialogues convened in Ashgabat, Almaty, Bishkek and Tashkent in 2026 under the World Bank's Central Asia

Water and Energy Program (World Bank, forthcoming), which provided structured evidence on drought hazard, institutional readiness and priority measures. The assessment reports are being finalized for publication and are cited here as forthcoming; the paper draws only on findings that were presented and discussed at the national dialogues, and statements attributed to the assessment should be read as provisional until the reports are released.

The interviews were conducted between 2022 and 2023, in the course of policy dialogues and technical roundtables in the five countries and of the 2023 mission, whose on-site visits to water agencies and ministries provided direct observation of implementation conditions. More than 60 semi-structured interviews were held in total, in all five countries, with the smallest number in Turkmenistan; a per-country breakdown is not reported because, in the smaller national water-sector communities, it would make individual participants identifiable. Participants belonged to three categories: senior officials of ministries and national water agencies responsible for policy; managers of basin, provincial and district water organizations and of water user associations; and independent experts, including researchers and staff of development partners. They were selected purposively, starting from the professional network built up by the author since 2005 and extended by referral, and recruitment in each country stopped when additional interviews no longer yielded new themes, which was taken as the criterion of saturation. Interviews lasted between 45 and 90 minutes and were conducted in Russian or English, in person and, in a minority of cases, online. Given the sensitivity of budget and procurement matters in the region, interviews were not audio-recorded; detailed notes were taken during and immediately after each interview, and participants gave informed consent orally at the start of the interview on the understanding that neither they nor their institutions would be identifiable. The notes were coded thematically by hand, first deductively against the three stages of the framework and then inductively within each stage, and the coded material was triangulated with the documentary record and the author's field notes. Participants are anonymized: where interview evidence is used in the text, it is attributed to the participant category and country only, and where interviewees are said to have held a view consistently, the pattern of agreement and the main alternative view are reported.

Three limitations should be stated. Quantitative estimates of investment needs, subsidies and cost recovery are indicative, since national figures differ in year, coverage and definition. Public evidence on Turkmenistan is thinner than for the other four countries: the analysis of Turkmenistan rests on official documents, the regional hydrological data compiled by the Scientific Information Center of the Interstate Commission for Water Coordination and a small number of interviews, and no independent data on sector finances are available. Statements about Turkmenistan in Sections 4.2 and 4.3 should therefore be read as lower-confidence characterizations, and they are marked as such where they appear. Finally, the analysis offers an interpretive institutional explanation; its claims concern mechanisms and their strategic implications, not statistically measured effects.

4. FINDINGS

4.1 Adoption: why five different states converged on one reform template

Since 2016, all five Central Asian states have adopted new water strategies, codes or programs of a strikingly similar type. Kazakhstan approved a concept for the

development of its water resources management system for 2024-2030, with quantified targets for irrigation water savings, water reuse and conveyance-loss reduction, and followed it with a new Water Code in 2025 (Government of the Republic of Kazakhstan, 2024a, 2024b; Republic of Kazakhstan, 2025). The Kyrgyz Republic adopted a National Water Strategy to 2040 in 2023 and a new Water Code, passed by parliament on 30 April 2025 and signed into law on 27 June 2025 to replace the code of 2005 (President of the Kyrgyz Republic, 2023; Kyrgyz Republic, 2025a, 2025b), together with the strategy's program to establish basin councils, a state water cadastre, and restored water-use permitting. Tajikistan has pursued a water sector reform program for 2016-2025 built on the transition from administrative-territorial to basin management, codified in a new Water Code in 2020 and extended by a National Water Strategy to 2040 in 2024 (Government of the Republic of Tajikistan, 2015, 2024; Republic of Tajikistan, 2020). Turkmenistan adopted a Water Code in 2016 that enshrines integrated water resources management and combines territorial with basin principles, and in 2019 reorganized sector governance by creating a State Committee for Water Economy and adopting a socio-economic development program for 2019-2025 that prioritizes water saving and regional water cooperation (Turkmenistan, 2016; President of Turkmenistan, 2019a, 2019b). Uzbekistan combined a concept for the development of the water sector for 2020-2030 with a large digitalization effort and targets for public-private partnerships and phased cost recovery, subsequently reinforced by the Uzbekistan-2030 strategy and a water management program for 2025-2028 (President of the Republic of Uzbekistan, 2020, 2021, 2023a, 2023b, 2024, 2025). Table 1 summarizes these commitments. The templates are close to identical: every strategy invokes IWRM, basin governance, digitalization, water saving, and financial sustainability.

Table 1. National water sector strategies and legislation of the Central Asian states since 2016

Country	Core direction	Illustrative commitments
Kazakhstan	Integrated, climate-resilient water management with strong digitalization	Save 2,192 million m ³ of irrigation water per year and cut conveyance losses from 50 to 25 percent by 2030; expand hydrological monitoring (Concept 2024-2030, as amended in August 2024); Water Code (2025)
Kyrgyz Republic	Basin governance and legal-institutional foundations	National Water Strategy to 2040 (2023); Water Code (2025, in force 2026); basin boundaries and councils; state water cadastre; restored permitting; first economic instruments
Tajikistan	IWRM and hydrographic basin management	Water Sector Reform Programme 2016-2025; Water Code (2020); National Water Strategy to 2040 (2024); basin institutions at national and sub-basin level; separation of policy from service provision
Turkmenistan	Modernization of water economy under IWRM	Water Code (2016); State Committee for Water Economy (2019); water saving; storage expansion and Karakum canal rehabilitation

Uzbekistan	Digitalization, infrastructure reliability and market mechanisms	Concept 2020-2030; Smart Water metering on 18,576 facilities by 2030; 50 PPP projects by 2030; cost recovery of at least 15 percent by 2025 and up to 30 percent by 2030; water-saving irrigation on 2 million hectares
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Sources: Kazakhstan - Government of the Republic of Kazakhstan (2024a, 2024b), Republic of Kazakhstan (2025); Kyrgyz Republic - President of the Kyrgyz Republic (2023), Kyrgyz Republic (2025a, 2025b); Tajikistan - Government of the Republic of Tajikistan (2015, 2024), Republic of Tajikistan (2020); Turkmenistan - Turkmenistan (2016), President of Turkmenistan (2019a, 2019b); Uzbekistan - President of the Republic of Uzbekistan (2020, 2021, 2023a, 2023b, 2024, 2025). Full bibliographic details are given in the reference list.

The convergence is puzzling at first sight, because the adopting states differ substantially in political institutions, fiscal capacity, and basin position. Three mechanisms, corresponding to the framework's adoption-stage variables, explain it. The first is transnational template diffusion. The World Bank, the Asian Development Bank, GIZ, Swiss Development Cooperation and UNDP have carried a standardized reform package into the region; IWRM, basin governance, digitalization and cost recovery are the paradigms these organizations certify as fundable, and adopting them lowers the cost of access to international finance for capital-hungry water sectors. The second is regional political incentive. The post-2016 rapprochement and the consultative meetings of heads of state made it visible which governments were modernizing their water sectors, and which were falling behind; no leadership wished to appear the laggard. The third is executive centralization. In all five countries, the presidential office acted as the principal policy champion, and the small number of veto players, assessed in Section 3.1, allowed rapid enactment. Finally, the shared Soviet administrative legacy made the same instruments legible to bureaucracies across the region, so a common template could be grafted onto broadly similar inherited structures.

The common focusing event was climatic. Interviews with water experts across the five countries consistently dated the acceleration of the reform wave to the drought-related shocks of 2019-2021, which placed water scarcity at the top of political agendas in all capitals simultaneously. The pattern was not uniform, however. Interviewees in Kazakhstan, the Kyrgyz Republic and Uzbekistan, the countries hit hardest in 2021, identified the drought as the decisive trigger, whereas interviewees in Tajikistan and Turkmenistan cited it as one factor among several and gave comparable weight to the post-2016 rapprochement and to the availability of international finance, a view the framework treats as complementary rather than competing. Interviewees in all five countries described policy design as championed from the center of government and executed by sector ministries, and reported little overt opposition at adoption except over tariff adjustments in the Kyrgyz Republic. The adoption stage, in other words, worked exactly as the policy-change literature would predict: a shared shock, powerful champions, an internationally certified template, and few veto players produced convergent enactment. The question is what happened next.

4.2 Translation: where the delivery gap opens

Translation is where the five trajectories part ways and where the region's central problem lies. Following the definition in Section 3.1, the divergence has an institutional face, an operational face and a financial face, and the three reinforce each other.

The institutional face is visible in three recurring bottlenecks documented across the region: (i) a weak link between the sizable budgets allocated to reform programs and the capacity of national agencies to implement and procure; (ii) non-transparent procurement procedures; and (iii) a lag in monitoring and data exchange between the tiers of water management. Basin organizations remain in testing mode in most countries; water user associations are heterogeneous in function and capacity; and environmental objectives, though prominent in every strategy, are less operationalized than economic ones. Digitalization illustrates the operational face of the problem. Metering and information systems are being installed across the region, but their installation does not by itself change allocation or accountability; that requires reliable equipment, compatible systems, and agencies able to use data in operational decisions, conditions that develop far more slowly than hardware is procured. In the vocabulary of institutional theory, the reforms are layering new rules onto older arrangements whose practical logic-centralized allocation, politically fixed tariffs, and the expectation of state provision-remains in force (Mahoney & Thelen, 2010; Van Assche et al., 2014; see the country examples in Section 3.1). The three bottlenecks listed above were raised by interviewees in every country, most insistently by managers of basin and district organizations, and were observed directly during the 2023 mission visits to water agencies and ministries.

The financial face of the translation problem is deeper, because it decides whether reformed institutions can operate at all. The figures that follow are the author's indicative estimates, compiled from national investment programs, budget data and development-partner portfolios in the course of a regional assessment of water-sector financing for the CAREC Institute (Abdullaev & Akhmedov, 2023) and cross-checked against the Eurasian Development Bank's sector studies (Vinokurov et al., 2021, 2023); they are indicative because national data differ in year, coverage and definition. On this basis, annual water-related investment needs are about USD 5.0-6.3 billion for the region against documented flows of USD 3.0-3.7 billion, a shortfall of roughly 40-45 percent, consistent with the finding that national financing covers only about half of the investment the sector requires (Abdullaev & Akhmedov, 2023). Some 70-80 percent of irrigation infrastructure is worn out, and inter-farm and on-farm networks average about fifty years of age (Vinokurov et al., 2023), and between 30 and 60 percent of the water withdrawn for irrigation is lost before it reaches the field (Abdullaev & Akhmedov, 2023). Budget allocations cover only part of required operation and maintenance costs, approximately 65 percent in Kazakhstan, 32 percent in the Kyrgyz Republic, 43 percent in Tajikistan, 56 percent in Turkmenistan, and 57 percent in Uzbekistan, and capital coverage is lower still. Irrigation service fees recover on the order of 20-30 percent of actual costs (Dankova et al., 2022), collection rates often run at 30-40 percent, and state budgets absorb indicative annual subsidies of USD 150 million in Kazakhstan, USD 50 million in Uzbekistan, USD 45 million in Turkmenistan, USD 32 million in Tajikistan, and USD 30 million in Kyrgyzstan for water and related energy use (Abdullaev & Akhmedov, 2023).

These figures describe not a temporary funding shortage but a self-reinforcing trap. Low payments reduce maintenance funds; weak maintenance lowers reliability; poor service reduces the willingness to pay; and low collection deepens dependence on unstable public budgets and donor rehabilitation (Hellegers & Perry, 2006; Dinar &

Tsur, 2021). The exceptions prove the mechanism: collection rates of 80 percent and above are documented where service has improved, for instance by Tajikistan's Agency for Land Reclamation and Irrigation in 2021 (Abdullaev & Akhmedov, 2023), and water user association managers and sector experts interviewed in the Kyrgyz Republic and Tajikistan reported on-farm collection rates of 80-90 percent in well-functioning associations where users had seen service improve, which indicates that payment compliance is governed by credibility as much as by affordability.

The same trap explains why external capital has not filled the gap. According to the World Bank's Private Participation in Infrastructure database, private infrastructure investment in Central Asia between 1990 and 2021 totalled USD 9.1 billion across 75 projects, of which only four projects worth USD 160 million were in water and sewerage, against nearly USD 5.7 billion in energy (World Bank, 2022; Abdullaev & Akhmedov, 2023). The obstacle is not commercial disinterest but absent financeability: where asset registries are incomplete, maintenance obligations unenforceable and tariffs politically fixed, PPP legislation produces a legal framework without investable projects (OECD, 2018; World Bank, 2023). Donor finance has partly compensated, but in doing so it has reinforced a project-based rehabilitation model in which assets are restored without secure recurrent maintenance funding and project arrangements fade after closure (Chatalova et al., 2017).

Translation capability also differs by country in ways that matter later in the argument. Kazakhstan has the largest fiscal capacity and the most developed PPP framework, though irrigation applications remain limited; the Kyrgyz Republic and Tajikistan assign stronger operational roles to water user associations but depend heavily on concessional finance; Uzbekistan combines extensive state financing, above all for its energy-intensive pumping systems, with active reforms in asset management and metering; Turkmenistan remains predominantly state-led, with limited public evidence on sector finances, a characterization that carries lower confidence than the others for the reasons given in Section 3.2. The delivery gap, in short, is universal in kind but unequal in degree, and in shared basins it is the largest gap, not the average one, that sets common exposure.

4.3 Response: dry years as the audit of delivery

If translation failures remained latent, they would be a national fiscal problem. Drought makes them manifest, and it does so with increasing frequency. Under climate change, higher temperatures raise evaporative demand, alter snowmelt timing and increase the probability that a meteorological anomaly propagates into agricultural, hydrological and socio-economic drought (Lioubimtseva & Henebry, 2009; Reyer et al., 2017; IPCC, 2022). Low-water periods on the Amu Darya now recur every four to five years, and high-water periods only every six to ten (Vinokurov et al., 2023). Drought must be distinguished from the region's permanent aridity: a dry year becomes a crisis not because rain fails but because monitoring does not feed into decisions, reservoir and canal operations are not adjusted, farmers are warned too late, and response is financed after losses have occurred (Wilhite et al., 2014). Each of these failure points is a translation failure of the kind described in Section 4.2, observed under stress. The 2021 event demonstrated the mechanism. The countries affected were precisely those whose monitoring systems produced data without triggers, whose advisory services did not reach farmers in time, and whose contingency financing was assembled after the losses. National exposure differed with geography, rainfed grain and rangelands in Kazakhstan, glacier-fed headwaters and irrigated valleys in the Kyrgyz Republic and Tajikistan (Sorg et al., 2012), hydrological dependence on Amu Darya inflow in Turkmenistan,

irrigation dependence and the Aral lowlands in Uzbekistan, and in the headwater states hydropower dependence converts low-water years into energy-security problems (Jalilov et al., 2016). Yet the regional assessment in which the author participated (World Bank, forthcoming) found that the readiness gaps behind these different geographies converge: weak links between monitoring and action, fragmented mandates, absent operational triggers, insufficient last-mile advisory services and underdeveloped risk financing recur in all five national assessments, with the qualification for Turkmenistan noted in Section 3.2. The delivery gap is the common denominator of the region's drought vulnerability. The response stage is also where national gaps become regional. Because the Amu Darya and Syr Darya connect upstream snowpack and reservoirs with downstream irrigation and deltas, a poorly managed dry year in one country reappears for its neighbors as pressure on seasonal allocation, food prices, labor migration and the shared environmental legacy of the Aral Sea, whose salt and dust storms already affect Kazakhstan, Turkmenistan and Uzbekistan simultaneously (Micklin, 2007). The regional institutional architecture, meanwhile, mirrors the national pattern of functions without connective tissue. Drought-relevant capacities exist: the Interstate Commission for Water Coordination supports seasonal allocation, its Scientific Information Center compiles hydrometeorological data, the basin water organizations manage operations, the International Fund for Saving the Aral Sea provides a political umbrella, and the regional Center for Emergency Situations coordinates disaster response. But monitoring is not linked to agreed triggers, dry-year allocation practices are not codified into transparent protocols, national drought information is not comparable, and no dedicated drought coordination mechanism exists. The arrangement of 2025 for the Bahri Tojik reservoir in Tajikistan illustrates both points. On 30 May 2025, on the margins of the Dushanbe conference on glacier preservation, the water ministers of Tajikistan, Uzbekistan and Kazakhstan signed a trilateral protocol on the reservoir's operating regime for June-August 2025, under which Kazakhstan was to receive 491 million m³ through the interstate Dostyk canal at the peak of the vegetation season, in addition to the seasonal limits that the Interstate Commission for Water Coordination had set in April; comparable protocols had been negotiated in 2021, when 315 million m³ were released, and in 2023, when about 491 million m³ were, with Tajikistan compensated in machinery and fuel (Fergana News Agency, 2025; Kwan, 2025; Thompson, 2025; Prime Minister of the Republic of Kazakhstan, 2023; Khovar, 2022). The releases relieved irrigation shortages in Kazakhstan's Turkestan region at the height of the season. The arrangement shows both that regional flexibility is possible and that it is renegotiated annually at ministerial level, with volumes and compensation settled case by case, rather than embedded in a standing dry-year protocol that would make it dependable.

The Amu Darya adds a dimension that the five-state architecture does not cover. Afghanistan, whose territory generates a substantial share of the basin's runoff, is party neither to the 1992 Almaty Agreement nor to the Interstate Commission for Water Coordination, and its withdrawals, currently estimated at 3-5 km³ per year, are expected to rise to 9-11 km³ once the Qosh Tepa Canal is operating; the canal's first 108-kilometre phase was completed in October 2023 and full commissioning is projected for 2028 (SIC ICWC, n.d.; Rakhimova & Dolidudko, 2025; Ilkhamov, 2023). Estimates of the effect on downstream flows depend on the assumed withdrawal, conveyance losses, and climate scenario and are discussed in Section 5.3. For the present argument, the point is different: the exposure baseline of Turkmenistan and Uzbekistan is shifting at the same time as their delivery capability is being tested, and no institution exists in which that shift can be negotiated with the riparian causing it. Table 2 summarizes the argument of this section in terms of the framework.

Table 2. The reform chain in Central Asian water governance: convergence, divergence and regional exposure

Stage	What the evidence shows	Direction of variation	Regional implication
Adoption	Similar strategies in all five states; shared template of IWRM, basin governance, digitalization, cost recovery; common 2019-2021 focusing event	Convergent	Shared reform vocabulary lowers transaction costs of cooperation
Translation	Unequal budget execution, capacity, procurement and data systems; 40-45 percent financing shortfall; low cost recovery; marginal private capital	Divergent	Weakest implementer sets basin-wide exposure; finance gap is a governance gap
Response	Recurring drought reveals absent triggers, thin advisories and post-hoc financing; regional functions exist but are unconnected; dry-year practice is ad hoc	Convergently weak	National delivery failures propagate across borders through shared basins; Amu Darya exposure baseline shifting with Afghan withdrawals outside the allocation framework

Source: compiled by the author

5. DISCUSSION

5.1 *Delivery capability as a regional security variable*

The findings resolve the puzzle stated in the introduction. Convergence has not produced water security because it is generated at the adoption stage, by diffusion, political incentive and executive advocacy, while security is decided at the translation and response stages, where capability, finance and preparedness reside. The region has aligned what can be aligned by signature and diverged where alignment requires budgets, registries, tariffs and trained agencies. This is not a Central Asian peculiarity; it is what the policy-transfer literature would expect when standardized templates travel into unequal administrative settings (Resnick et al., 2018; Mahoney & Thelen, 2010; Mukhtarov, 2014). What is distinctive about Central Asia is that the costs of the resulting delivery gap are not contained by borders. In shared basins, an unmanaged dry year in one state arrives in the next as an allocation dispute, a food-price shock, an energy shortfall, or a wave of labor migration, without any hostile intent anywhere in the chain. This reframes the regional security question that has organized the literature since the 1990s. The relevant risk is no longer that states will fight over water; three decades of institutional persistence argue against it (Ziganshina & Sehring, 2021). The relevant risk is that states will quietly fail to deliver, and that the shared basins will distribute the consequences of that failure regionally. Domestic implementation capacity thereby

acquires the status of a regional security variable, much as fiscal discipline does within a monetary union: each member has a legitimate interest in the delivery performance of the others, because each is exposed to it. Accepting this logic changes what regional water cooperation should be about. Its object is not primarily the negotiation of allocation, which existing institutions handle adequately in normal years, but the mutual visibility and reinforcement of delivery.

5.2 Regional public goods as the cooperative consequence

What form should such cooperation take? The political culture of Central Asian regionalism after 2016 is consultative rather than supranational; proposals implying transfers of sovereignty have consistently stalled, while functional and technical cooperation has proven durable, as the survival of the Interstate Commission for Water Coordination through the 1990s demonstrates. The findings therefore point not to a new organization but to regional public goods: products from which all riparians benefit and which none can efficiently produce alone (Pahl-Wostl, 2009). Five follow directly from the identified gaps, and each attaches to an existing institution (Table 3).

Harmonized indicators respond to the finding that national drought and water information is not comparable; without comparability, no regional product can guide shared action. Dry-year protocols codify what is currently ad hoc, including the documentation, compensation, and scenario basis for exceptional reservoir releases of the kind negotiated for Bahri Tojik in 2021, 2023 and 2025, converting annual bargaining into dependable practice. A seasonal regional drought bulletin, issued before each vegetation season and updated during it, links monitoring to decisions at the regional scale, provided it is written for decision-makers rather than only for technical specialists. Transboundary scenario planning for low-flow and high-temperature combinations in the Amu Darya, Syr Darya and Chu-Talas systems pre-negotiates response options under plausible stress, which is cheaper and politically easier than negotiating during the event. Joint investment preparation, finally, converts national priorities into financeable regional packages of water accounting, irrigation efficiency, advisory services and ecosystem-based measures, including restoration of the Tugai and delta landscapes through which drought and the Aral legacy interact (Micklin, 2007).

Table 3. Existing regional mechanisms and proposed delivery-oriented functions

Mechanism	Current function	Proposed additional function
ICWC and basin water organizations	Seasonal allocation and operational basin management	Dry-year protocols; scenario-based allocation reviews; documentation of exceptional releases
Scientific Information Center of ICWC and national hydromets	Data compilation, forecasts and water availability analysis	Regional seasonal drought bulletin; harmonized indicators and trigger guidance
IFAS and Aral Sea Basin Program	High-level basin cooperation and environmental programming	Political umbrella for drought and ecosystem-resilience measures
Center for Emergency Situations and regional DRR channels	Preparedness and emergency response coordination	Early-action checklists; impact reporting; links to contingency financing

Research institutions and universities	Training, remote sensing, modelling, policy dialogue	Science-policy support and investment preparation for the regional pipeline
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Source: compiled by the author

Two design principles follow from the analysis rather than from general preference. First, the platform connecting these functions should be light, technical and product-oriented, because the adoption-stage machinery of the region is already strong; adding another declaratory layer would reproduce the very pattern the paper diagnoses. Success should be measured in delivered outputs, a published bulletin, an agreed indicator set, a signed protocol, not in meetings held. Second, the last mile must be treated as part of the regional architecture, not as a national afterthought. Early warning changes outcomes only when it changes decisions (Pulwarty & Sivakumar, 2014), and the translation-stage findings show that the link from information to farmers, water user associations, pasture users and local governments is the weakest in the chain. Regional cooperation can supply shared methodologies and peer learning for advisory services, including attention to language, trusted channels and gendered access to information, while delivery itself remains national and local.

5.3 Sequencing finance, and the closing window

The translation-stage findings carry a direct implication for how the region and its partners should finance the water agenda. Because financeability is an emergent property of governance, instruments cannot substitute for foundations: co-financing arrangements, green bonds and blended instruments cannot be built on unregistered assets, unenforceable maintenance obligations and symbolic tariffs (OECD, 2019; World Bank, 2023). The sequence that follows is asset and responsibility settlement first, then credible service standards and measurement, then legitimate funding streams combining differentiated tariffs with transparent subsidies, and only then scaled deployment of diversified instruments. Regional cooperation can accelerate this sequence without replacing it: harmonized asset data and jointly prepared project pipelines lower preparation costs and raise the sector's credibility with financiers, as the Kambarata-1 process, in which Kyrgyzstan, Kazakhstan and Uzbekistan jointly engaged donors around a shared asset through the donor coordination committee established in June 2024, has begun to show (World Bank, 2024, 2025). A second discipline concerns measurement: water-saving investments should be evaluated at basin scale and in terms of consumptive use, since reduced conveyance losses do not necessarily reduce basin-level depletion; apparent savings may irrigate additional land while return flows diminish. Without this accounting, the region could finance efficiency and still deepen scarcity.

Finally, the window in which this agenda is feasible should not be assumed permanent. The Qosh Tepa Canal, introduced in Sections 3.1 and 4.3, makes the point concrete. The Scientific Information Center of the Interstate Commission for Water Coordination estimates that Afghan withdrawals in the basin could rise to 9-11 km³ per year after the canal's projected completion in 2028, equivalent to about 15-18 percent of the mean annual flow of 62 km³ at the section above the Karakum Canal intake, and that in low-water years the supply available downstream during the vegetation season could fall to half of requirements; its water-balance modelling under a regional climate scenario to 2060 puts the basin's total deficit at 12-16 km³, more than double the present level

(SIC ICWC, n.d.; Rakhimova & Dolidudko, 2025). Other estimates range from 8 to 20 percent of annual flow, and up to 30 percent of Uzbekistan's allocation under the most likely scenario, depending on the assumed withdrawal (6-13 km³ per year), conveyance losses (about 22 percent) and total river flow (Ilkhamov, 2023; Faizi, 2024), while the Eurasian Development Bank projects a combined shortage of 5-12 km³ by 2028 from climate change, low-water cycles and the canal together (Vinokurov et al., 2023). The range itself is the point: the region does not yet possess an agreed hydrological baseline against which the effect could be measured, and Afghanistan is party to none of the institutions in which such a baseline could be negotiated. Whatever the eventual figure, a region with harmonized accounting, agreed scenarios and codified dry-year rules will face that development from a far stronger position than five separate national datasets and improvised responses. The climatology of the region, meanwhile, suggests that the next severe drought is a matter of years rather than decades. Political rapprochement, a shared reform vocabulary, and available international finance currently coincide; the analysis in this paper indicates precisely what that coincidence should be spent on.

6. CONCLUSION

This paper asked why the convergence of water reform agendas in Central Asia since 2016 has not produced water security. Following reforms through adoption, translation, and response, it showed that the convergence is real but confined to the adoption stage, where transnational template diffusion, regional political incentives, and centralized executives align what states enact. The delivery gap opens at translation, where unequal administrative capability and a financing shortfall of roughly 40-45 percent, itself rooted in incomplete asset ownership, politically constrained tariffs and the low-price-low-service trap, leave reformed institutions without operational capability. Recurrent drought then audits the whole chain, and in shared basins it distributes the cost of national failures regionally.

The central conclusion is that domestic delivery capability has become a regional security variable in Central Asia. The strategic water risk facing the region is not interstate conflict, against which its institutions have proven resilient, but delivery failure, against which they are largely undesigned. The cooperation agenda that follows is specific: harmonized indicators, dry-year protocols, a seasonal drought bulletin, transboundary stress scenarios, jointly prepared investment pipelines and an agreed hydrological baseline from which to engage Afghanistan, produced through existing institutions and judged by delivered outputs. Financing strategy at both levels should respect sequencing, building the governance foundations on which diversified instruments depend.

The analysis also identifies what research should measure next: implementation outcomes rather than reform adoption, including cost-recovery performance, basin-scale consumptive-use effects of water-saving investments, scheme-level asset ownership and lifecycle costs; the propagation of drought impacts through the water-energy-food system of the shared basins; and scenarios for engaging Afghanistan in basin governance. The region's water future will be decided less by the texts of its strategies than by the machinery of budgets, registries, triggers and protocols examined here, and the present political moment is the best opportunity in three decades to build that machinery before the next dry cycle tests it.

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CONFLICTS OF INTEREST

The author declares no conflict of interest.

AUTHORS' CONTRIBUTIONS

IA: conceptualization, methodology, investigation, formal analysis, writing – original draft, writing – review and editing.

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FROM PILOT TO PROCUREMENT: INSTITUTIONAL CONDITIONS FOR SCALING PUBLIC-SECTOR AI IN KAZAKHSTAN WITH COMPARISONS TO AZERBAIJAN AND SOUTH KOREA

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ABSTRACT. Governments increasingly test artificial intelligence (AI) through pilots, but technical success does not establish a purchaser, a lawful contract route, or operating capacity. This article examines the institutional arrangements through which public-sector AI pilots may progress to regular procurement, deployment, and capability building. It develops a five-condition framework covering problem ownership, public-data access, a post-pilot procurement pathway, evaluation and accountability, and capability transfer. A structured, focused comparison of Kazakhstan, Azerbaijan, and South Korea maps selected official instruments issued by August 2, 2026. The analysis is typological and does not estimate actual conversion rates or causal effects. It is organized around a Kazakhstan-specific puzzle: why has one of post-Soviet Eurasia's most advanced digital states built strong infrastructure for AI experimentation without an equally specified route from trial results to procurement? Kazakhstan combines a national AI platform, data-governance rules, and an AI law with an incompletely specified route from trial evidence to budgeted acquisition in the consulted record. Azerbaijan's 2026–2028 action plan connects sandbox integration with measures supporting innovative firms' access to procurement, although these provisions remain prospective. South Korea provides a codified contrast through designation, pilot purchasing, and public-user evaluation; its program adjustments also recognize that initial participation does not assure later demand. The clearest difference across the selected architectures concerns the procurement pathway, the usefulness of which depends on agency ownership, reliable evidence, and accountable operation. Interpreting these arrangements in light of Kazakhstan's administrative development and procurement political economy, the article proposes an AI Innovation Procurement Track with competition safeguards, public evaluation, and capability-transfer requirements. These proposals follow from institutional design reasoning and require legal review and subsequent empirical testing.

KEYWORDS: public procurement for innovation, artificial intelligence, pilot scaling, Kazakhstan, Azerbaijan, South Korea.

1. INTRODUCTION

Artificial intelligence often enters government through a pilot: a time-limited, small-scale trial intended to generate evidence before commitment to full deployment. Such trials offer visible and reversible opportunities to explore a service improvement. The difficulty begins when the demonstration ends. An experimentation budget may not cover operations, sponsoring officials may not control procurement, and a promising

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prototype may lack a lawful route to a follow-on contract. The resulting “pilot trap” concerns institutional conversion: how evidence from a temporary experiment becomes a defensible, budgeted, operational public commitment. The OECD’s Digital Government Outlook 2026 reports that, in its 2025 survey, 21 of 36 OECD countries provided central support for AI procurement, while 10 of 36 had conducted studies of the financial or non-financial impact of government AI use cases (OECD, 2026). These indicators concern different institutional activities; neither measures the proportion of pilots that became operational services.

If experimentation does not influence acquisition, startups may focus on competitions without obtaining durable public demand, and agencies repeatedly incur the cost of discovery without obtaining a production system. Conversely, an acquisition system that moves too quickly can lock in a weak product or convert pilot discretion into favoritism, so scaling requires a route that is open to innovation but remains auditable. The article asks which institutional arrangements can connect public-sector AI pilots to regular procurement, deployment, and domestic capability. Kazakhstan provides the central puzzle. A highly ranked e-government state has developed a national AI platform, government-wide data-management requirements, a dedicated AI ministry, and an AI law. In the selected documentary record, however, the link from trial evidence to a budgeted acquisition is less explicit. This asymmetry directs attention to Kazakhstan’s administrative development, state-led modernization, and procurement political economy (Cummings & Nørgaard, 2004; Knox & Orazgaliyev, 2025). A structured comparison examines Azerbaijan’s emerging strategic connection between experimentation, integration, and procurement support, alongside South Korea’s codified sequence of designation, pilot purchase, user evaluation, and market signaling.

The comparison proceeds from Kazakhstan’s institutional characteristics and uses the other cases to identify potentially relevant mechanisms. South Korea supplies a diagnostic contrast rather than a prescribed development trajectory. Its arrangements are examined together with their limits, including the possibility that designation precedes a committed user and the absence of guaranteed follow-on demand (Section 5.3). Kazakhstan remains the empirical and policy focus. The argument is that five institutional conditions are proposed to shape the transition from pilot to procurement: (C1) an operational agency owns the problem, budget, and adoption decision; (C2) the pilot and eventual operator have lawful, usable public-data access; (C3) rules specify a post-pilot procurement pathway; (C4) evaluation and accountability turn trial evidence into an auditable decision; and (C5) implementation transfers capability to domestic firms and personnel. C3 occupies the gate position in this chain because it turns trial evidence into a possible transaction; yet it is not sufficient: a pathway without a committed owner can support a purchase with no sustained user, and a contract without capability transfer may scale dependence rather than public capacity.

The article makes three contributions. First, it shifts the unit of analysis from the quality of an individual AI pilot to the institutional chain connecting experimentation, certification, acquisition, and operation. Second, it connects public procurement for innovation to Central Asian studies debates on state capacity, bureaucratic reform, and technological modernization, adding evidence from Kazakhstan and Azerbaijan to a literature disproportionately based on OECD and European settings. Third, it develops a concrete design: an AI Innovation Procurement Track that builds on Kazakhstan’s existing platform and public-administration strengths rather than assuming an institutional deficit.

Sections 2–4 set out the literature, the framework, and the design; Sections 5 and 6 present and compare the cases; Section 7 proposes policy implications; Section 8 concludes.

2. LITERATURE REVIEW

2.1. *Piloting and public procurement for innovation*

Pilots are designed to reduce uncertainty, but the organizational form of a pilot can also preserve uncertainty: a temporary team, exceptional data access, and a demonstration budget create conditions that disappear at the moment of scale; more users inside one agency do not transfer to agencies whose data definitions, risk tolerances, and workflows differ. Policy-piloting research explains why evidence from a bounded experiment may not transfer readily into ordinary administration. Pilots can serve testing, persuasion, and mobilization, so assessments of success encompass program, process, and political considerations (Checkland et al., 2023; Nair, 2021). Bailey et al. (2017) show how exceptional arrangements and contested objectives shape piloting in the English NHS; their findings motivate attention to the rules that apply when an experiment ends. Nair (2021) similarly examines the design and subsequent use of policy pilots. Regulatory guidance reinforces the need to plan this transition. Article 57 of the EU Artificial Intelligence Act provides for AI regulatory sandboxes and exit documentation (European Parliament & Council of the European Union, 2024), while OECD (2023) guidance addresses eligibility and assessment. Australia's Digital Transformation Agency (2026) organizes movement from proof of concept to scale through staged decisions. These sources inform the framework without establishing that its five conditions are universally sufficient.

Evidence from digital health provides a useful sectoral analogy. Sustainability depends on governance, financing, interoperability, and workforce capacity as well as technical performance (Kaboré et al., 2022). The review does not directly measure public-sector AI procurement, but it supports examining the organizational conditions under which a tested intervention continues beyond its initial project. AI makes this transition a continuing governance problem. Performance can change with data drift, vendor updates, and workflow changes, limiting what a one-time acceptance test establishes. System behavior also depends on data whose quality and availability the supplier may not control. Explanation and human-oversight arrangements must be appropriate to the system's risk and use. Acquisition therefore needs to cover monitoring, revalidation, and incident handling throughout operation (Hickok, 2024). Public bodies retain accountability for how algorithmic systems are used; responsibility cannot simply be assigned to the vendor (Kuziemski & Misuraca, 2020). Scaling frequently requires a second decision by actors with different legal responsibilities. A digital unit may sponsor the experiment, a sectoral agency own the service, a procurement unit conduct the tender, and a finance authority control expenditure. The analytical object is consequently a connected set of authorizations rather than a single adoption decision.

Public procurement for innovation (PPI) treats the state as a demanding customer whose demand can shape markets by articulating problems, creating a reference customer, and rewarding public-value solutions (Edler & Georghiou, 2007). Edquist and Zabala-Iturriagagoitia (2012) distinguish procurement of available innovation from pre-commercial development processes; the distinction matters for AI programs that

blur hackathons, grants, regulatory-sandbox trials (a term defined below), prototype procurement, and production contracting. Direct demand-pull occurs when public purchasing creates revenue; an indirect certification effect occurs when government selection signals quality to other purchasers or investors (Dai et al., 2021). Without credible, portable certification, participation may yield little more than publicity. Institutional design determines whether these effects appear: risk aversion, rigid specifications, fragmented demand, short contract horizons, and price-centered selection can favor established solutions over novel ones (Uyarra et al., 2020). Choi et al.'s (2015) account of Korea shows that innovation-oriented instruments emerged partly in response to price-centered procurement. The central design tension is whether rules make experimentation and evidence legible enough for public buyers to act without abandoning competition, value for money, or accountability.

For AI specifically, procurement is itself a primary site of administrative policymaking: specification, evaluation criteria, and contract terms allocate discretion and accountability over machine-learning systems before any sectoral regulator acts (Mulligan & Bamberger, 2019). This supports treating the acquisition route as constitutive of AI governance rather than as downstream logistics. This article develops the notion of an institutionalized certification chain. A pilot becomes procurement-relevant when (1) a public problem and accountable user are specified; (2) the test's data and operating environment resemble eventual deployment; (3) evaluation applies preannounced criteria; (4) the result is recorded in a form recognized by purchasing rules; and (5) a lawful acquisition option follows. Certification does not guarantee purchase; it converts evidence from an event into an administrative object a buyer may rely on. Three instruments must be distinguished. An accelerator supports firms through mentoring, training, and networks. A regulatory sandbox permits supervised testing for a limited period within an authorized legal framework; the scope for regulatory clarification, adaptation, or exemptions depends on that framework (OECD, 2023; Zetzsche et al., 2017). Okonjo (2026) examines how sandbox arrangements might support public-sector AI experimentation. Innovative procurement creates a purchase or an eligible purchasing status. Participation in one instrument does not establish access to the next. A firm can complete an accelerator without an agency owner, finish a sandbox without an acquisition budget, or obtain a prototype contract without an operations plan.

2.2. State capacity and procurement in Central Asia

Central Asian governments have expanded digital services rapidly. Kazakhstan ranked twenty-fourth in the 2024 United Nations E-Government Development Index with a score of 0.9009 (United Nations Department of Economic and Social Affairs [UN DESA], 2024). That position evidences institutional strength; it does not establish that AI procurement is solved: digital-service maturity and innovation procurement are distinct capabilities. Research on post-Soviet state capacity distinguishes ideational, political, technical, and implementational dimensions, providing a basis for examining uneven institutional development in Kazakhstan (Cummings & Nørgaard, 2004). Recent scholarship describes a hybrid administrative system in which service modernization coexists with centralized political control (Knox & Orazgaliyev, 2025). Studies of bureaucratic performance and politico-administrative culture also draw attention to political influence, hierarchy, and the conditions for public-service reform (Knox & Janenova, 2023; Karini, 2024). These findings suggest, without directly proving, that building central digital infrastructure and distributing acquisition authority may present different reform problems. Knox and Janenova (2019) describe an e-government paradox

in which visible service improvements need not transform underlying administrative relationships. Newer research examines legal responsibility and governance risks in Kazakhstan's AI transition (Amirova, 2025; Buribayeva et al., 2026), while Keegan (2024) cautions against assuming that e-government adoption necessarily increases public contestation.

Public procurement itself must be treated as a political-economic process. In Kazakhstan, it is a documented site of corruption risk: survey evidence finds officials and suppliers complicit in corrupt practices that monitoring reforms have not resolved, and links procurement-related inequality to the grievances behind the January 2022 unrest (Khamitov et al., 2023). OECD monitoring quantifies the pattern: grounds for single-source procurement remain overly broad, and direct contracts exceeded 30 percent of purchasing in 2023 in each procurement sector monitored (OECD, 2024a). A large share of purchasing also runs through the quasi-state sector, including national holdings and state-owned enterprises under separate rules and variable accountability (OECD, 2024b), so "public procurement" in Kazakhstan denotes several regimes, not one. Preference schemes in Kazakhstan's resource sectors have likewise facilitated relationship-building and rent-seeking alongside their developmental aims (Kalyuzhnova & Belitski, 2019). These findings caution that a special route with weak safeguards could create a new channel of preferential access in an environment where such channels have been exploited. The design problem examined in Sections 5–7 is therefore not only how to build a bridge but how to build one that does not become a bypass. JCAS scholarship has begun to situate AI within international-relations and international-law debates (Kukeyeva et al., 2024); this study complements that agenda by examining how government becomes a buyer and operator of AI.

Azerbaijan offers a different configuration: the ASAN Service one-stop shop provides a reference point for public-service reform, associated with service integration, standardized delivery, and institutional redesign (Alguliyev et al., 2018; Garayev, 2025; Sadigov et al., 2025). The question addressed here is whether recent strategy converts that service-delivery base into a route from AI testing to acquisition and nationwide use. Policy-transfer research warns against treating a visible foreign institution as a portable object: ideas move through translation and adaptation (Stone et al., 2020), and transfer depends on fit with the receiving administrative context (Ugyel & Daugbjerg, 2020). South Korea is therefore used to expose a mechanism, not to recommend transplantation of an entire procurement regime.

The reviewed literature converges on four points: pilot quality alone cannot explain scale; government demand creates revenue and certification only when procurement recognizes the generated evidence; agency ownership, data, evaluation, and accountability are complements; and institutional instruments travel imperfectly, requiring local adaptation. For the post-Soviet settings discussed in Section 2.2, procurement discretion also raises questions of preferential access. Evaluation and audit are therefore part of the proposed pathway's design. Three propositions organize the comparison as analytical expectations: P1, more explicitly specified procurement pathways should distinguish architectures that connect experimentation to acquisition; P2, such pathways should be more usable when combined with agency ownership, governed data, and accountable evaluation; and P3, capability-transfer obligations should matter for the capability retained after deployment. The study maps the first two expectations at the institutional level. It does not test causal effects, and the limited variation in C5 prevents assessment of P3.

3. ANALYTICAL FRAMEWORK

3.1. Outcome and institutional conditions

The outcome is the institutionalization of the pilot-to-procurement transition. It is not the number of pilots or an unobserved conversion rate. Institutionalization refers to the extent to which public rules and recurring practices define who may initiate a pilot, how the system may use public data, how performance is judged, how the result enters an acquisition decision, and how operational responsibility is retained. The unit of analysis is the national conversion architecture for public-sector AI. Within each case, the analysis traces links among four instrument families: AI and digital-government policy; data-governance rules; public-procurement law and innovation-procurement programs; and implementation or reporting arrangements. Individual projects are illustrations only.

The framework groups the relevant arrangements into five conditions. C1 identifies the operational owner, C2 governs data, C3 specifies acquisition options, C4 establishes evaluation and accountability, and C5 addresses capability retained after deployment. Their order of discussion is not a mandatory chronology: procurement rules should inform trial design, while evaluation informs the later acquisition decision. Section 4 explains coding and Section 5 applies the framework.

C1: Problem ownership. A sectoral public organization must own the operational problem, nominate an accountable service lead, and indicate a plausible budget route; central innovation bodies can broker demand but cannot substitute indefinitely for a user agency. Ownership is the entry condition for everything that follows.

C2: Public-data access. Data access must be lawful, technically feasible, proportionate, and extensible to operations; a data platform is relevant when it specifies authority, quality, security, access roles, and continuity. Even a well-governed test, however, only produces evidence; whether that evidence can change an acquisition decision is a separate institutional fact, addressed by C3.

C3: Post-pilot procurement pathway. The legal and administrative route after a positive evaluation must be specified; mechanisms range from innovation-product designation and central pilot purchase to negotiated-contract eligibility, staged contracts, and competitively awarded frameworks. High institutionalization does not require automatic purchase; it requires a lawful decision gate with known eligibility, budget authority, competition safeguards, and a possible next contract. A gate, in turn, is only as good as the evidence it admits, which is why C3 presupposes C4.

C4: Evaluation and accountability. Evaluation should combine technical performance with criteria appropriate to the use case, including service outcomes, user experience, cost, safety, error distribution, cybersecurity, explainability, and human oversight or appeal. The public owner must take responsibility for accepting the evaluation, with results recorded for audit. For AI, a credible arrangement also addresses post-deployment monitoring and material changes. These requirements help make a special purchasing route accountable and contestable (Section 2.2).

C5: Domestic capability transfer. Deployment should leave usable capability in public organizations and the domestic ecosystem. Relevant dimensions include government capacity to operate and monitor the system; local engineering expertise; workforce skills; maintenance and operational control; and rights over data, configuration, and infrastructure needed for continuity or switching suppliers. This study examines these

dimensions where they appear in public program rules and contractual requirements. It does not measure national human capital or technological sovereignty as a whole. Supplier nationality alone does not establish operational independence. The distinction between formal ownership and substantive control is informed by digital-sovereignty scholarship (Pohle & Thiel, 2020), while the emphasis on learning and retained competence draws on absorptive capacity (Cohen & Levinthal, 1990).

Table 1. Operationalization of the five conditions

Condition	Low	Medium	High
C1 Problem ownership	Pilot initiated without named operational owner or budget route	Agency participates, but authority or operational commitment is incomplete	Named service owner, responsible official, staff contribution, and credible budget/adoption authority
C2 Public-data access	Ad hoc or unclear access; no operational continuity	Lawful access or sharing arrangements exist, but governance or test-to-operation continuity is incomplete	Architecture: established legal authority and governance for data provision. Continuity: documented, secure access can continue from test to operation
C3 Procurement pathway	Pilot returns to undifferentiated general procurement	Policy promises integration or innovative purchasing, but procedure is incomplete	Law or recurring program links qualification, pilot purchase/evaluation, and a lawful next acquisition step
C4 Evaluation and accountability	Vendor-led demonstration or unspecified criteria	KPIs and oversight exist, but results are not consistently procurement-relevant	Preannounced multi-dimensional criteria, public-user sign-off, recorded feedback, monitoring, and liability allocation
C5 Capability transfer	Delivery can remain externally dependent	Local participation or training is encouraged	Contracted knowledge transfer, documentation, interoperability, local maintenance, and public workforce capability

Source: author's framework. C2 architecture and continuity are assessed separately when the evidence diverges (Section 3.1; Appendix A2).

Problem ownership, procurement pathways, and capability transfer are relevant to public digital innovation more broadly. Their AI-specific implications arise from continued dependence on governed data and the possibility of changing model performance. C2 therefore considers continuity from test to operation; C4 includes appropriate error assessment, oversight, and monitoring; and C5 considers the skills and rights needed to maintain and correct a deployed model (Hickok, 2024). Across all cases, C2 credits data provisions explicitly linked to the examined AI experimentation or procurement architecture; general digital-government maturity alone is not scored as evidence of

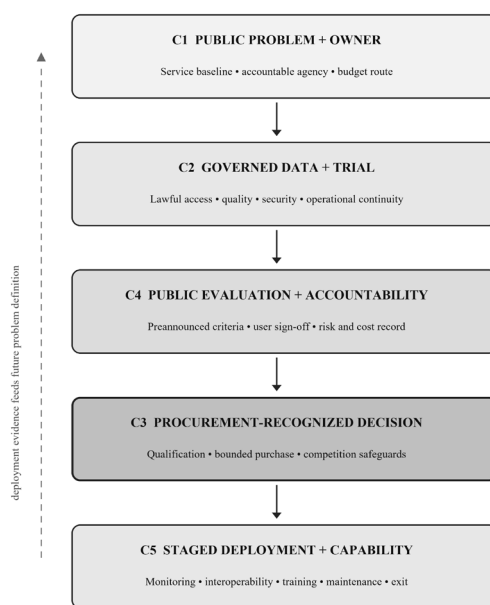
C2. C4 grades the procurement-recognized evaluation and accountability arrangements in Table 1, with limits of AI-specific assurance recorded for each case in Appendix C.

The ordinal labels summarize documented institutional arrangements, rather than project performance or interval measurements. A “high” score means the architecture makes the relevant arrangements regularly available. For C2, architecture-level evidence concerns established legal authority for data provision and associated governance obligations; operational evidence concerns documented, secure continuity from trial to use. Where these components diverge, each is judged separately and a split score (“high/medium”) is reported. The first label refers to architecture and the second to continuity; the split does not mean that both meet the high threshold. Where recurring routes differ on the coded dimension, the score reports the range across routes (“medium–high”). The coding remains provisional where historical versions or implementation evidence could not be fully established; Appendix C records these limitations.

3.2. The proposed conversion mechanism

Figure 1 presents the proposed mechanism: C1 begins the chain because a public problem has to enter with an owner; C2 and C4 shape the evidentiary quality of the test; C3 is the conversion gate that determines whether a qualifying result is recognized in a purchasing process; C5 is embedded across contracting and operation; and feedback from deployment returns to evaluation.

Figure 1. The institutionalized certification chain from pilot to procurement



No stage guarantees purchase; each creates an auditable decision right.

Source: author's framework

The logic is configurational rather than causal, and three levels should be kept apart: institutional dimensions (C1–C5), institutional configurations (how a country's

conditions combine; Table 2), and procurement or deployment outcomes (whether pilots in fact become contracts and operating services). This study provides evidence on the first two levels only, so no claim should be read as an estimate of a condition's effect on realized outcomes. The framework does not treat any single condition as sufficient; the configuration of interest is the joint presence of C1–C4, with C5 shaping whether scale produces domestic and public capability rather than only installed software.

4. RESEARCH METHODS

4.1. *Comparative design and documentary evidence*

The study uses structured, focused comparison (George & Bennett, 2005), asking each case the same questions: who owns the public problem; what authority and infrastructure govern data access; what happens administratively after a favorable evaluation; who evaluates performance and bears responsibility; and what capabilities remain with domestic firms and public organizations. Cases were selected for comparative relevance rather than statistical representativeness. Kazakhstan and Azerbaijan share a post-Soviet administrative background, presidential centralization, hydrocarbon-based economies, and prominent one-stop public-service reforms. These similarities provide context; they do not hold all competing explanations constant. Azerbaijan contributes a recently specified strategic link between experimentation, integration, and procurement support. South Korea supplies a more codified contrast within the selected cases, making designation, purchasing, and evaluation arrangements visible in law and program rules. The design combines a contextual comparison with a mechanism-oriented contrast.

Azerbaijan is outside Central Asia and is included because the 2026–2028 action plan specifies an intermediate institutional configuration relevant to C3. The selection does not establish that its plan is the region's most advanced or that comparable mechanisms are absent in other countries. Uzbekistan and Kyrgyzstan were not coded. The regional suggestions in Section 7.2 are therefore untested applications of the framework, rather than comparative findings. South Korea helps identify functions that might be adapted: deliberated designation, time-limited purchasing eligibility, central pilot purchase, recorded public-user evaluation, and statutory allocation of purchaser liability. Their relevance to Kazakhstan depends on local legal authority, fiscal arrangements, and accountability safeguards (Sections 2.2, 5.1, and 6.4).

The corpus includes laws, presidential and government acts, strategies, action plans, procurement regulations, and official implementation reports issued by August 2, 2026. Appendix B summarizes 23 core documents in 21 entries: the PPS purchasing regulation and its implementation-timing announcement share one entry, as do two 2024 pilot-purchase announcements. Some historical consolidations could not be fully retrieved. The comparison accordingly maps the selected instruments and their documented commitments, rather than certifying an exhaustive inventory of all operative rules at the cutoff. Peer-reviewed studies and international reports provide context and triangulation but do not replace national legal sources. Documents were read against the rule-based codebook in Appendix A; for each condition, evidence was classified as low, medium, or high using Table 1. The coding gives priority to operative law and program rules over aspirational strategy language, and to recurring arrangements over one-off announcements. Where a strategy promises a mechanism but the consulted record does not establish an implementing procedure, the case cannot score high on that condition. Contradictory evidence is retained in the narrative rather than averaged away.

Appendix C provides a cell-by-cell audit trail recording the principal instruments relied on, supporting and counter-evidence, and the rationale for boundary judgments.

The analysis separates inputs and activity, including platform use, agents under development, designations, and aggregate purchases, from procurement and deployment outcomes. It infers no AI conversion rate from all-product totals. A procedure that was not located in the consulted record is reported as such; this is not proof that it is absent from all law, agency practice, or subsequent implementation.

4.2. Positionality and limitations

The author has participated professionally in government proof-of-concept and startup-support programs in several of the countries studied. This experience informed the research question but is not presented as undisclosed empirical evidence. The case analysis relies on the identified public documentary corpus. The recommendations could be relevant to the author's professional field, a potential interest disclosed in the conflict-of-interest statement. The proposal does not select a program operator or supplier. Author information and professional roles accompany the manuscript. The study analyzes public documents and reports no interviews, personal data, or human-subject experiments, and the author reports that institutional review board approval was not required; the corpus and codebook are disclosed to facilitate audit.

Five limitations bound the analysis. First, the study lacks a comparable project-level dataset connecting pilot admission, evaluation, contract award, deployment, and later performance. It therefore examines institutional arrangements rather than realized conversion rates. Second, the propositions in Section 2.2 are typological. C3 partly constitutes the architectural descriptions, so their correspondence with C3 is not an independent causal test. P3 cannot be assessed because all three cases receive a medium C5 score. Third, the coding was performed by a single researcher; Appendix C exposes the evidentiary basis of every score, but independent re-coding remains for subsequent work. Fourth, documentary analysis may understate informal coordination and overstate the implementation of written rules. National summaries also conceal agency variation, and incomplete retrieval of some historical versions limits negative legal findings. Fifth, the comparison does not isolate fiscal capacity, market size, bureaucratic professionalism, industrial policy, political structure, or implementation age. Section 6 discusses these competing explanations without ruling them out.

5. FINDINGS

5.1. Kazakhstan

Kazakhstan enters the AI transition with a strong asset base: the Concept for the Development of Artificial Intelligence for 2024–2029 makes infrastructure, data, human capital, and AI products one state agenda and treats the platform as shared public infrastructure for experimentation (Government of Kazakhstan, 2024a). Kazakhstan's Law on Artificial Intelligence establishes responsibilities and the National Artificial Intelligence Platform (Republic of Kazakhstan, 2025). In the enacted text, Article 13 addresses state-body provision of data and creation of data libraries, subject to stated exceptions; Article 25 provides for a controlled, time-limited development and trial environment; and Article 27 governs data libraries. These provisions support experimentation but do not themselves specify a recurring post-trial purchasing

procedure. The separate 2024 data-management requirements provide a further governance basis (Government of Kazakhstan, 2024b). This is a finding about the cited provisions, not an exhaustive conclusion about every implementing instrument. Reporting on 2025, the ministry stated that the National AI Platform was operating in pilot mode, AI assistants had been used more than two million times, and more than 50 AI agents were under development (Ministry of Artificial Intelligence and Digital Development of Kazakhstan, 2026b). These are reported activity measures. They do not establish the number of unique users, operational deployments, or procurement conversions.

The 2025 restructuring of the Ministry of Artificial Intelligence and Digital Development strengthened the formal basis for central coordination (Government of Kazakhstan, 2025). The Digital Qazaqstan strategy, approved by Presidential Decree No. 1311 on June 9, 2026, provides a subsequent government-wide direction (President of the Republic of Kazakhstan, 2026). For problem ownership (C1), these central arrangements and the AI Governance Cup identify public-sector uses, but the consulted descriptions do not establish a universal requirement for a named service owner, an acquisition decision, and an operating budget at pilot admission (Ministry of Artificial Intelligence and Digital Development of Kazakhstan, 2026a). Central coordination does not by itself commit a ministry or akimat, a regional executive administration, to continuing expenditure. C1 is medium because participation arrangements are visible while standing ownership and budget commitments remain insufficiently evidenced. For public-data access (C2), the AI law, platform, and data-management rules are the strongest part of Kazakhstan's chain. The limitation is continuity: a platform-based test still needs project-level access agreements, security controls, and an operational interface after the trial, and neither the platform nor the data libraries guarantee sustained live data flows. The statutory data-provision authority and associated governance rules meet the architecture component of C2, while project-specific continuity remains medium. The two components are reported as "high/medium" under Section 3.1 and Table 1.

The post-pilot procurement pathway (C3) is the least specified part of the selected record. The 2024 Law on Public Procurement and Ministry of Finance Order No. 687 provide the general framework (Republic of Kazakhstan, 2024; Ministry of Finance of Kazakhstan, 2024). The consulted AI-platform provisions do not identify a recurring status or procedure that connects a favorable trial evaluation to a subsequent acquisition. As some historical implementing texts were not fully retrievable, this is a provisional assessment of the reviewed architecture. A possible consequence is a procedural discontinuity: an agency may need to translate trial learning into a later procurement without a standard process for recognizing that evidence. The documents do not establish that specifications are legally barred from using such learning, nor do they demonstrate how often a procedural reset occurs. C3 is coded low because a recurring AI trial-to-acquisition bridge was not located, while general procurement remains available. This proposed bridge must be considered alongside documented procurement risks and the separate rules governing parts of the quasi-state sector (Kalyuzhnova & Belitski, 2019; Khamitov et al., 2023; OECD, 2024a, 2024b). Those findings justify competition, conflict-of-interest, and audit safeguards. They do not directly establish the motives of officials handling AI pilots. The policy task is to define a lawful and reviewable acquisition route without creating preferential access for pilot participants.

For evaluation and accountability (C4), Kazakhstan's legal framework articulates AI responsibilities, and transformation maps and indicator systems can support monitoring, yet program descriptions emphasize development activity more than a standardized,

procurement-relevant evaluation record. High C4 would require preannounced criteria, user-agency sign-off, cost and risk assessment, recorded results, post-deployment monitoring, and clear responsibility for harmful outputs. The ingredients are emerging, but the chain is not fully integrated; C4 is medium. For domestic capability transfer (C5), the national strategy's attention to talent, platform access, datasets, and local products supports capability building, but participation does not automatically produce control of integration, maintenance, monitoring, or intellectual assets, and the contracting documents examined impose no standard AI-specific capability-transfer package. C5 is medium. Kazakhstan's selected instruments consequently show a formal foundation for experimentation alongside a less explicit acquisition connection. The coding identifies a documentary discontinuity and a question for further implementation research; it does not measure the size of investment or demonstrate that every pilot encounters the same problem.

5.2. Azerbaijan

Azerbaijan's starting point is different. ASAN Service established a highly visible one-stop model whose standards, user orientation, and institutional form are well documented (Alguliyev et al., 2018; Garayev, 2025; Sadigov et al., 2025), and INNOLAND added incubation and acceleration functions (ASAN Service, 2018). Neither defines how an AI prototype becomes a public contract. The AI strategy approved in 2025 sets a national agenda (President of the Republic of Azerbaijan, 2025). The 2026–2028 Action Plan for Accelerating Digital Development provides more specific prospective actions (President of the Republic of Azerbaijan, 2026a). It addresses data governance, AI use in public services, sandbox testing, and local capability. Action 8.3.7 calls for a framework for integrating successful sandbox models nationally. Separately, action 8.2.6 envisages preference mechanisms for startup participation in state-enterprise procurement. Reading the measures together suggests a strategic connection between testing and demand, but does not establish a single integrated purchasing procedure.

For problem ownership (C1), the Digital Development Council and institutional roadmaps provide coordination structures (President of the Republic of Azerbaijan, 2026c). The first council meeting reported 58 initiatives in the action plan and roadmaps prepared with 40 state institutions; 13 roadmaps were approved or at the approval stage (President of the Republic of Azerbaijan, 2026b). These are separate counts. They do not demonstrate that each AI pilot has a committed operating owner and acquisition budget, so C1 is medium. For public-data access (C2), the strategy and action plan address data-pool development, interoperability, and the once-only principle, under which information already held by the state can be reused subject to applicable rules. These commitments do not establish a standard test-to-operation access protocol for every AI use case. C2 is medium because the governance direction is explicit while operational continuity remains incompletely evidenced.

For the post-pilot procurement pathway (C3), the action plan specifies relevant destinations more clearly than a general pledge to support startups. However, national integration under action 8.3.7 and state-enterprise procurement support under action 8.2.6 are distinct prospective measures. Neither is an automatic purchase entitlement for a successful sandbox participant. The sandbox framework has a December 2026 deadline, after the study's cutoff date. In the selected corpus, the documents do not set out a complete, recurring procedure equivalent to a designation-and-pilot-purchase scheme; the 2023 Law on Public Procurement supplies only the general acquisition framework (Republic of Azerbaijan, 2023). The remaining task is to define eligibility,

decision rights, competition safeguards, pricing, evaluation reuse, and budget authority. C3 is therefore medium: relevant integration and procurement measures are specified in outline, but not yet fully operationalized.

For evaluation and accountability (C4), Azerbaijan has an established emphasis on service standards, and the 2026 plan adds responsible institutions, milestones, quarterly KPIs, and user-satisfaction measurement; AI-specific evaluation still requires criteria for error, human oversight, security, and continuing model performance, recognized by procurement decision-makers. C4 is medium. For domestic capability transfer (C5), the action plan's explicit local-product and knowledge-transfer provisions are stronger than nationality-based symbolism, and accelerator and staff-development programs may contribute to capability building (ASAN Service, 2019). The strength of transfer will nevertheless depend on future contracts. C5 is medium. Azerbaijan is therefore characterized as emerging integration. The action plan makes testing, national adoption, and procurement support relevant to the same policy agenda, while an explicit and recurring connection among those processes remains to be demonstrated.

5.3. *South Korea*

South Korea provides a codified contrast for examining procurement functions. PPS describes an innovative-procurement program initiated in 2019 and reports designated-product counts rising from 345 in 2020 to 2,280 in 2024 (Public Procurement Service, n.d.). These are program-wide figures, not AI-specific counts or a pilot-conversion rate. The 2026 basic plan also expands support for pilot purchasing (Public Procurement Service, 2025). Articles 5 and 27 of the Procurement Business Act establish the committee and public-purchase support for innovative products. Article 27(4) limits the purchasing official's liability for losses arising from an innovative-product purchase unless intent or gross negligence is present (Republic of Korea, 2020). Article 26(1)(5)(g) of the Enforcement Decree of the Act on Contracts to Which the State Is a Party provides a legal basis for negotiated (single-source) contracts for the manufacture, purchase, or lease of innovative products designated under Article 27(1) of the Procurement Business Act (Republic of Korea, n.d.). Paragraphs 2 and 3 of Article 33 of the Procurement Business Act's Enforcement Decree set an ordinary designation period of three years, permit extensions of up to three years following committee deliberation, and allow a separately determined period under the stated exception (Republic of Korea, 2025). Eligibility does not guarantee a contract award. The identified administrative rules add operational detail (Ministry of Finance and Economy of the Republic of Korea, 2026; Public Procurement Service, 2026a). The cited versions and limits of historical retrieval are identified in Appendix B.

Two funding routes coexist. A demand institution may buy a designated product with its own budget through the innovation marketplace; separately, PPS may purchase it with central funds and place it with a user institution for evaluated trial use (Public Procurement Service, n.d.). The second route is a way to allocate the financial risk of initial use centrally; the first depends on each agency's budget authority and requires attention to the receiving system's fiscal arrangements. Problem ownership (C1) varies across recurring program routes. Demand-led arrangements begin with a public institution's problem, whereas supplier-led designation can precede a committed public user (Public Procurement Service, n.d.). C1 is therefore represented as medium-high across routes, with the stronger assessment confined to arrangements that establish the owner and adoption authority required by Table 1. Route design alone does not prove that all participating agencies make a sustained budget commitment. For public-data

access (C2), Korea's digital-government capacity provides extensive infrastructure, but innovative procurement rules do not settle data access for every AI product: public users can test products in their own environments, yet sectoral privacy, interoperability, and security rules remain decisive. C2 is assessed as medium in this specific conversion architecture.

For the post-pilot procurement pathway (C3), designation makes a product visible and purchase-eligible; negotiated-contract eligibility gives that status transactional force; pilot purchase allows a public institution to use the product; and recorded results may inform later demand. The arrangement promises no supplier a contract; it creates a legible route through which the state can purchase uncertainty in stages. PPS reported innovative-product purchases rising from KRW 467.8 billion in 2021 to KRW 815.7 billion in 2023 (Public Procurement Service, 2024a). The figures show that the pathway is used; they do not identify the AI share. The bridge is not frictionless, and PPS's own program design records the friction: the 2026 basic plan prefers demand institutions that purchase designated products with their own budgets or present follow-on purchase plans, and provides a re-challenge route for products whose pilot performance was insufficient (Public Procurement Service, 2025). These design responses recognize the possibility that designation and a first purchase may not lead to repeat buying. C3 is high for its recurring legal procedure; this score does not establish a conversion rate or imply that follow-on demand is assured.

For evaluation and accountability (C4), public institutions evaluate pilot use and report results, Article 33 of the Procurement Business Act's Enforcement Decree provides for publication subject to exceptions, and Article 27(4) of the Act addresses buyer risk (Republic of Korea, 2020, 2025). The purchasing regulation requires a pre-use implementation plan and provides for mid-trial checks, completion reports, evaluation, publication, and use-and-management inspections (Public Procurement Service, 2026a, Arts. 29, 33, 36–39, and 40-3). These provisions support C4's high score for an accountable procurement record. Discretionary inspection powers do not by themselves establish continuous AI monitoring or effective implementation.

The January 2026 amendment introduced a dedicated evaluation track for AI software and AI-converged products, with evaluation forms whose criteria are adapted to AI characteristics (Public Procurement Service, 2026a, Art. 14(3), Annexes 4-4 and 4-5). The supplementary provisions defer their application to the fourth supplier-proposed designation round of 2026, which PPS announced for around September (Public Procurement Service, 2026b). At the August 2 cutoff, the AI criteria were therefore codified but awaiting application; they are not evidence of implemented assurance or operational effectiveness. Earlier announcements already show AI products entering the procurement architecture: the second matching round of 2024 placed 74 products with 188 institutions, including an AI call-bot service and a cancer-detection assistance program; the third round included an AI social robot (Public Procurement Service, 2024b, 2024c). These examples establish program participation, not effectiveness.

For domestic capability transfer (C5), the system can provide a public reference customer and a certification signal. Yim et al. (2024) situate such support within Korea's wider startup policy ecosystem. Yet designation and purchase do not ensure that public employees can maintain a model or that knowledge transfers across organizations. C5 is medium: a procurement bridge creates a market signal, while capability-transfer clauses must be designed separately. South Korea illustrates a recurring certification and purchasing architecture with defined limits. Designation, purchasing authority,

public-user testing, and liability allocation are connected, while follow-on demand and AI-specific assurance remain separate implementation questions that the program itself continues to address.

5.4. Cross-case pattern

Table 2. Comparative institutionalization of the pilot-to-procurement chain

Condition	Kazakhstan	Azerbaijan	South Korea
C1 Problem ownership	Medium: central coordination and sectoral structures; a named owner and budget are not established as universal pilot entry conditions	Medium: council and institutional roadmaps; a committed owner and acquisition budget for each pilot are not demonstrated	Medium–high: high in the demand-proposed route and pilot purchase; medium in the supplier-proposed route, where designation can precede a named user
C2 Public-data access	High/medium: AI platform, data libraries, and data-management rules at the architecture level; operational continuity remains project-specific	Medium: data-pool and interoperability commitments; operational access remains incompletely evidenced	Medium in the procurement mechanism: strong national capacity, but access remains sector-specific
C3 Procurement pathway	Low: general procurement exists; no recurring AI trial-to-purchase bridge located	Medium: prospective sandbox integration and state-enterprise procurement support; a unified recurring procedure not established	High: designation, time-limited negotiated-contract eligibility, pilot purchase, supply, and later signaling are law-backed; follow-on demand is not guaranteed
C4 Evaluation and accountability	Medium: legal responsibilities and monitoring tools exist; standard procurement-relevant pilot record is incomplete	Medium: responsible officials, KPIs, and satisfaction feedback; AI-specific criteria emerging	High: public-user evaluation, recorded feedback, inspection provisions, and bounded liability protection; dedicated AI criteria codified for application after the cutoff
C5 Capability transfer	Medium: talent and domestic products prioritized; standard contract obligations incomplete	Medium: local-product support and knowledge transfer explicit; contract implementation pending	Medium: strong market-reference effect; public/internal technical transfer not automatic

Overall conversion architecture	Partial in the selected record: formal experimentation foundations, less explicit acquisition connection	Emerging: related integration and procurement measures specified prospectively	Routinized with caveats: recurring designation and purchase arrangements; follow-on demand and AI assurance not guaranteed
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Source: Author's coding and revision of the documentary assessment (Appendices B–C). The table maps selected instruments issued by August 2, 2026; historical version and implementation limitations are recorded in Appendix C. Scores are not performance measures, and the overall row is a qualitative description rather than an aggregate.

The table describes institutional configurations rather than a development ranking or procurement outcomes. The clearest cross-case distinction is C3, which also informs the overall descriptions; this correspondence therefore cannot independently test P1. The variation between Korean demand-led and supplier-led arrangements illustrates why P2 warrants project-level investigation, but it does not establish route-specific conversion effects. P3 cannot be assessed with identical C5 scores. Split and range scores follow the reporting conventions of Section 3.1 and Appendix A.

6. DISCUSSION

6.1. Procurement and institutional complementarity

The framework locates a possible source of the pilot trap in a break between two governance logics: experimentation asks whether a solution can work, while procurement asks whether the state may buy a specified object, from whom, at what price, with what liabilities, under what competition rule. Sequenced without a bridge, technical learning may not inform the acquisition decision. C3 occupies the gate position in the framework because it concerns recognition of trial evidence in an acquisition process. South Korea specifies designation and purchasing options, Azerbaijan links related prospective measures within one action plan, and the selected Kazakhstani AI-platform provisions define experimentation more explicitly than subsequent acquisition. This comparison concerns the organization of decision rights. It cannot estimate whether additional pilot funding would improve or worsen conversion. A special route can be captured, waste public funds, or privilege a weak incumbent. The relevant mechanism is a bounded certification gate: ex ante eligibility and evaluation, a limited and auditable purchasing authority, competition or contestability safeguards, and post-use evidence. Procurement then acts as both transaction and certification.

The Korean route also exposes the central design tension inside such a gate: time-limited negotiated-contract eligibility makes designation valuable to a supplier and usable to a buyer, yet it is, by construction, a bounded suspension of open competition, whose justification requires deliberation, time limits, liability rules, and recorded public use. A transplant that copied the single-source privilege without the deliberation, recording, and expiry would reproduce exactly the capture risk this article warns against; the relevant design lesson is to evaluate purchasing authority together with its safeguards. The framework also explains why procurement reform should be assessed together with the other conditions. C1 concerns who will use and fund the solution after an innovation team leaves. Korean supplier-led designation illustrates that eligibility can precede a committed user. The 2026 plan gives preference to institutions with own-

budget purchases or follow-on plans, but the announcement does not establish that a measured follow-on gap is concentrated in the supplier-led route.

C2 concerns whether pilot performance is relevant to operation: a model trained on a temporary extract may still fail on live administrative data, so a transition decision should assess data continuity, not only model accuracy. C4 makes performance evidence usable for accountable purchasing. Korea's public-user evaluation produces an accountable record, and its liability rule may reduce officials' perceived personal risk when the required process has been followed. The dedicated AI criteria were codified for later application, while their implementation and assurance during operation remain to be established. C5 concerns the capabilities retained after deployment: a domestic vendor contract is not domestic capability if the state lacks documentation, monitoring skills, and portable interfaces, while a foreign-origin component can contribute when the contract requires local engineering, training, and operational transfer. Capability should be specified as deliverables and rights.

6.2. *Alternative explanations*

Several factors could contribute to Korea's more codified procurement architecture: fiscal resources, technology-market size, industrial-policy experience, administrative capability, and implementation age. The three-case design does not isolate their contributions or show that institutional rules operate independently of them. Resources and administrative capability may help create and sustain the very rules compared here. The distinction between resources and legal authorization remains useful for policy design, but it is not a causal finding. OECD (2026) data show variation in central procurement support and impact studies even among OECD countries. They do not establish that Kazakhstan or Azerbaijan could reproduce a Korean mechanism at a particular cost or achieve the same results. Central coordination also has different institutional meanings across these cases. Presidential centralization in Kazakhstan and Azerbaijan should not be equated with South Korea's central procurement capacity. Published criteria and review procedures remain relevant to concentrated decision-making, but the comparison cannot attribute the observed differences to political structure alone. Implementation age also matters: Azerbaijan's action plan and Kazakhstan's AI law are recent, so medium or low scores may reflect sequencing rather than stable failure. This supports describing Azerbaijan's route as emerging and Kazakhstan's architecture as partial, without treating these descriptions as permanent rankings.

6.3. *The Kazakhstan puzzle in post-Soviet perspective*

The alternative explanations leave the central puzzle standing: why a state with demonstrated capacity for rapid digital construction has not specified the pilot-to-procurement bridge. The literature reviewed in Section 2.2 suggests an institutional hypothesis with three strands. First, the two tasks may draw on different components of state capacity. Platforms, strategies, ministries, and laws exercise technical and ideational capacity at the center, whereas a procurement bridge exercises implementational capacity, distributing decision rights to line agencies and akimats and disciplining them through recorded evaluation, the dimension that post-Soviet reform has found hardest to build (Cummings & Nørgaard, 2004; Knox & Orazgaliyev, 2025). Second, state-led modernization may reward visible, announceable construction more readily than a decision gate inside procurement whose benefits are less visible and more diffuse. Third, the political economy of procurement may make caution individually rational: where procurement is a documented risk area (Khamitov et al., 2023), an official considering

a novel, imperfect AI system may perceive a return to open tender as less risky where adequate institutional protection is unclear. On this reading, Kazakhstan's incomplete bridge would be an equilibrium of its administrative political economy rather than an oversight awaiting technical correction, and reform would have to change incentives as well as rules. The present documentary analysis does not observe officials' incentives or establish any of these mechanisms; the reading rests on the secondary literature and is offered as a hypothesis for interview-based and process-tracing research inside procuring institutions.

The same perspective clarifies what accountability must mean here. The policy question is not only how governments can move AI systems from pilots to procurement, but which systems should be scaled and under what safeguards. In administrative settings where avenues for public contestation are limited (Keegan, 2024), the citizen-facing elements of C4, including published evaluation criteria, appeal and human-override arrangements, complaint and incident records, and appropriate public reporting of error distributions, are not accessories to procurement but substantive conditions of legitimate scaling: these arrangements can give affected people a role in challenging and correcting deployed systems. A conversion architecture that accelerated purchasing without these elements would scale administrative power more reliably than public value; the framework therefore treats strengthening C3 as acceptable only jointly with the C4 provisions that make scaled systems contestable, and Section 7 carries this requirement into the design.

6.4. Implications for policy-transfer research

The comparison supports a mechanism-based approach to policy transfer. The visible Korean object is "innovative procurement," but its operative components are smaller: deliberated designation, time-limited negotiated-contract eligibility, central pilot purchasing, public-institution use, recorded feedback, a defined validity period, and protection for good-faith purchasers. Kazakhstan could examine adapting those functions to its National AI Platform and procurement law; Azerbaijan may route them through the Digital Development Council, sandbox governance, and its 2023 procurement framework. Institutional fit lies in the allocation of functions, not a copied program name, and their interdependence requires attention (Section 6.1).

7. POLICY IMPLICATIONS FOR KAZAKHSTAN AND CENTRAL ASIA

The recommendations follow from Sections 5 and 6; operational detail and statutory authority require domestic legal review. Because the study provides evidence on institutional configurations rather than realized outcomes (Section 3.2), they follow from design logic, not from an estimate of measured gains. Given Section 6.3, each element pairs an enabling provision with a safeguard: an unsafeguarded fast route would create the preferential-access channel this article warns against.

7.1. An AI Innovation Procurement Track

Kazakhstan could establish a bounded AI Innovation Procurement Track connecting the National AI Platform to ordinary public-purchasing institutions. Its legal feasibility requires review of the applicable procurement and budget statutes, implementing powers, and competition safeguards. A government program and regulations may address some components; legislative amendments may be necessary where existing

authority is insufficient. The following six stages are proposed design options, not a statement of current legal authorization.

1. Problem admission. An authorized public body submits a service problem with a baseline, responsible owner, data custodian, and plausible two-year operating budget; vendor-led ideas are admitted only after an agency adopts the problem statement, addressing a limitation of supplier-led designation, where certification can precede ownership.

2. Competitive solution selection. An open, functional-requirements-based competition grants access to a staged test and defines the maximum pilot-purchase value; it promises no production award.

3. Governed trial. A project-specific data agreement records purpose, fields, access roles, retention, security, quality, and conditions for operational continuity; higher-risk systems carry additional human-oversight and impact-assessment requirements.

4. Public evaluation. Technical, service, financial, and governance thresholds are registered before testing; the public owner signs the result and an independent technical or audit function verifies critical claims. Failure is a legitimate outcome that produces reusable learning.

5. Qualification and bounded purchase. A passing solution would become eligible for a limited purchase or staged deployment under an expressly authorized procedure, funded centrally or by the user agency. An initial two- or three-year qualification period is a design option requiring justification, not a duration established by this study. Rules should specify renewal, expiry, reevaluation after material change, competition safeguards, and the conditions under which another buyer may reuse the evidence. Qualification would confer no guaranteed production contract.

6. Operation and review. Deployment contracts include monitoring, incident reporting, exit and portability provisions, and a fixed-period review, with results feeding a registry accessible to authorized buyers and, where security permits, the public.

This design strengthens C3 using existing C2 assets, and makes C1 and C4 entry conditions rather than post-pilot repairs.

7.2. Accountability capability and regional applications

The track could include legally authorized protection for officials who act in good faith, disclose conflicts, apply the required evaluation, and remain within authorized expenditure. Any protection should exclude intentional wrongdoing, gross negligence, corruption, manipulated criteria, and ignored safety obligations. Korea's Article 27(4) provides a specific example of limited liability allocation for purchasing losses; it is not immunity from all responsibility. Whether an analogous provision is appropriate or legally available in Kazakhstan requires domestic legal review. Evaluation, audit, and responsibility allocation should be designed together. Kazakhstan already reports activity data; the next reporting layer should link stages. A public dashboard could report, by sector and risk class: admitted problems; trials started, completed, and failed; solutions qualified; pilot and repeat purchases; time to decision; cost; and service outcomes, with sensitive fields controlled. Publishing consistent stage definitions and denominators would let future research estimate conversion without conflating activity with impact. Evaluation should remain use-case specific and, for high-impact systems,

should include error distribution, human override, complaints, and incidents, consistent with the citizen-facing accountability requirement of Section 6.3.

The track should make capability transfer a scored and monitored component, specified along the C5 dimensions of Section 3.1: documentation, interfaces, training, local maintenance and incident-response roles, rights to configuration and logs, tested vendor exit, and subcontracting that gives domestic firms substantive technical work. Requirements should be proportionate and compatible with intellectual-property protection: the objective is not forced disclosure but avoidance of operational captivity, including captivity that persists when a local supplier depends on foreign platforms. Regional applications remain untested because Uzbekistan's and Kyrgyzstan's instruments were not coded. The framework could be examined in Uzbekistan and Kyrgyzstan by investigating agency ownership, recognition of evaluation evidence, and options for shared pilot-purchase resources. Because their instruments were not coded, the study cannot establish which arrangement each country needs or which would be more transferable. A common reporting schema for pilots and post-pilot decisions would support comparative research before any consideration of mutual designation recognition.

8. CONCLUSION

Progress from an AI pilot to an operating public service requires institutional decisions beyond technical validation. The five-condition framework connects ownership, data, acquisition, evaluation, and capability transfer. The selected documents indicate distinct configurations: Kazakhstan has a formal experimentation foundation with an incompletely specified acquisition connection; Azerbaijan proposes related integration and procurement measures; and South Korea provides a recurring designation and purchasing architecture with limits concerning follow-on demand and AI-specific assurance. The procurement pathway is the condition on which the cases differ most and the gate through which trial evidence must pass, but it is not sufficient. The framework proposes that its value depends on whether a service-owning agency is committed, the test resembles operational conditions, evaluation is auditable, and deployment builds lasting capability. A fast route without safeguards can scale poor products or discretionary favoritism as readily as innovation; Korea's bounded competition exception requires justification through deliberation, recording, expiry, and liability rules.

For Kazakhstan, the immediate opportunity is not to create another general AI program. It is to connect existing assets through an AI Innovation Procurement Track: admit agency-owned problems, run competitive trials on the National AI Platform, register evaluation criteria, qualify successful solutions for a limited purchase, define what follows expiry, protect good-faith officials, publish transition data, and contract for capability. Such a mechanism is intended to allow failure during experimentation while demanding responsibility at acquisition. For Central Asian studies, the comparison connects public-sector AI to questions of state capacity, administrative reform, and state-business relations. Kazakhstan's configuration is compatible with hypotheses about uneven capacity and the incentives surrounding procurement, but it does not establish those explanations. Further research should examine how central digital initiatives interact with the authority, budgets, and accountability of individual procuring organizations. A project-level registry linking admission, evaluation, award,

deployment, expenditure, incidents, and service outcomes would support more direct tests of institutional effects. Until such evidence is available, the defensible contribution is an explicit comparison of documented arrangements and a set of policy options whose feasibility and results remain to be assessed.

DATA AVAILABILITY

The study uses publicly available documents. The selected corpus, locators, cutoff and verification dates, coding rules, and cell-level audit trail appear in supplementary Appendices A–C. No confidential records or personal data are included.

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CONFLICT OF INTEREST

The author also serves as the Executive Director at IBEX (Antler Global), a global venture builder, and acts as an advisor for Gyeonggi Province, Incheon CCEL, and KISED in Korea. In these capacities, the author has participated professionally in the design and operation of government proof-of-concept and startup-support programs in the countries studied. This experience informed the research question but was not used as undisclosed empirical evidence; all case findings rest on the public documentary corpus described in the manuscript. No organization named in the manuscript had any role in the design, analysis, or reporting of this study.

AUTHORS' CONTRIBUTIONS

EA: conceptualization, methodology, investigation, formal analysis, writing, and visualization.

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Appendix A. Coding protocol

A1. Common case questions

1. What instrument admits a public problem into an AI pilot, and which public body owns the service outcome?
2. What rules authorize data access, ensure security and quality, and permit continuity into operation?
3. What legally recognized step follows a favorable evaluation? Is there a buyer, budget source, eligibility status, staged contract, or required new competition?
4. Which criteria are registered before testing, who signs the evaluation, where are results recorded, and how are liability and monitoring allocated?
5. What contract, program, or staffing provisions leave technical and operational capability in domestic firms and public organizations?

A2. Coding rules

1. Code the national architecture, not the best individual project.
2. Prioritize enacted law and implemented program rules over strategy language. Record provisions awaiting application separately from implemented arrangements.
3. Code a promised but procedurally incomplete mechanism no higher than medium.
4. Treat a one-off program as medium unless it has a recurring mandate, budget, and rule set.
5. Where a mechanism contains multiple recurring routes that differ on the coded dimension, report the range across routes (for example, “medium–high”) rather than the strongest route.
6. Where C2 architecture and continuity evidence diverge, assess the Table 1 components separately and report a split score, with architecture first. High architecture requires established legal authority and governance for data provision; high continuity requires documented, secure access from trial to operation. A split score is not an average or a claim that both components are high. Apply the same distinction across cases.
7. Do not use the quantity of pilots, platform users, or designated products as a conversion rate.
8. Record both enabling and constraining evidence; explain material contradictions in the case narrative.
9. Distinguish a selected historical instrument from a verified consolidation at the cutoff; qualify findings when retrieval is incomplete.
10. Treat “no public specification located” as a documentary limitation, not proof of nonexistence.
11. Reassess scores when implementing rules or project-level transition data become available.

A3. Replication fields for a future project-level dataset

Country; public problem; owner agency; service baseline; supplier; pilot start and end dates; data authority; risk class; evaluation thresholds; evaluation result; procurement procedure; award date and value; buyer; deployment status; repeat purchase; six- and twelve-month service outcomes; incidents; local staff trained; maintenance entity; and public source locator.

Appendix B. Core documentary corpus

Table B1. Core instruments coded in the comparison

Country	Instrument	Date/version	Primary relevance
Kazakhstan	Concept for the Development of AI for 2024–2029, Resolution No. 592	24 July 2024	C1, C2, C5; platform, datasets, product targets, talent
Kazakhstan	Requirements for Data Management, Resolution No. 925	7 November 2024	C2; government data governance
Kazakhstan	Law on Public Procurement, No. 106-VIII	1 July 2024	C3, C4; general procurement authority and safeguards
Kazakhstan	Public Procurement Rules, Order No. 687	9 October 2024	C3, C4; procedures and contract administration
Kazakhstan	Law on Artificial Intelligence, No. 230-VIII, Arts. 13, 25, 27	17 November 2025 enacted text	C2, C4; responsibilities, data provision, National AI Platform trial environment, data libraries
Kazakhstan	Measures implementing Presidential Decree No. 997; Government Resolution No. 846	9 October 2025	C1; central coordination mandate
Kazakhstan	Digital Qazaqstan Strategy through 2029	9 June 2026; Decree No. 1311	C1–C5; government-wide digital transformation direction
Azerbaijan	Law on Public Procurement, No. 988-VIQ	14 July 2023	C3, C4; general procurement framework
Azerbaijan	National Strategy on AI for 2025–2028	19 March 2025	C1, C2, C4, C5; national AI governance, pilots, data, talent
Azerbaijan	Digital Development Council instrument	27 February 2026	C1, C4; cross-government coordination and responsibility
Azerbaijan	Action Plan for Accelerating Digital Development, 2026–2028	27 February 2026	C1–C5; public-service pilots, sandbox-to-integration, procurement, data, KPIs, transfer
Azerbaijan	First Digital Development Council implementation report	29 June 2026	C1, C4; initiatives and institution roadmaps

South Korea	Procurement Business Act, Arts. 5(1)(2) and 27 (incl. 27(4))	31 March 2020 enacted text and amendment record	C1, C3, C4; designation deliberation, pilot purchase authority, liability allocation
South Korea	Enforcement Decree of Procurement Business Act, Art. 33	Decree No. 35947, 30 December 2025; effective 2 January 2026	C3, C4; categories, designation period, pilot use and results
South Korea	Enforcement Decree of the Act on Contracts to Which the State Is a Party, Art. 26	Identified provision; historical consolidation limited	C3; conditional negotiated-contract eligibility for designated innovative products
South Korea	MOFE Regulation on designation of innovative products and promotion of purchasing	2 January 2026; Directive No. 68	C1, C3, C4; designation operating procedures, incl. supplier- and demand-proposed routes
South Korea	Innovative-Product Purchasing Regulation, PPS Notice No. 2026-19; PPS implementation-timing announcement	30 January 2026; effective 3 February with specific application provisions; announcement 2 April 2026	C3, C4; purchasing and inspection rules; AI criteria codified for fourth-round application after the cutoff
South Korea	PPS About Innovative Procurement	Retrieved 11 September 2026; retrospective program description	C1, C3, C4; program design, designation figures, funding routes, purchase targets
South Korea	PPS announcement on entry, growth, and overseas expansion of innovative procurement firms	21 May 2024	C3, C4; aggregate program purchasing and designation data
South Korea	PPS 2026 Basic Plan for Pilot Purchase of Innovative Products	18 December 2025	C3, C4; budget expansion, follow-on purchase preference, re-challenge route
South Korea	PPS 2024 pilot-purchase announcements (second-round matching, June 10; third round, October 14)	10 June and 14 October 2024	C3; applicability to AI-related products (AI call-bot, AI cancer-reading program, AI social robot)

Source: Author's compilation. Locators appear in the References. Dates identify the selected instruments, not a claim that every historical consolidation was retrieved. Official implementation announcements supplement legal and policy documents; vendor marketing and independent news commentary are excluded from core coding.

Appendix C. Cell-level coding audit trail

Table C1 documents, for each condition–country cell in Table 2, the principal instruments relied on, the specific evidence supporting the score, material counter-evidence, and the rationale for boundary judgments. Instruments are identified as in Appendix B; full locators appear in the References.

Table C1. Evidentiary basis of the comparative coding

Case/ Condi- tion	Score	Principal instruments	Supporting evidence	Counter- evidence / caveat	Boundary rationale
KZ / C1	Medium	Res. No. 846 (2025); Digital Qazaqstan (2026); AI Governance Cup materials (2026)	Dedicated AI ministry, national digital strategy, and public-sector AI initiative descriptions	Universal ownership and budget conditions not established in consulted descriptions; some historical texts incompletely retrieved	Ownership mechanisms exist but are not a standing entry condition; fails the Table 1 “high” test of named ownership and budget/adoption authority at entry
KZ / C2	High/ medium	AI Law Arts. 13, 25, 27 (2025 enacted text); Res. No. 925 (2024)	Statutory authority for data provision, platform trial environment, data libraries; government-wide data-management rules	Trial period is limited; no located rule guarantees project-level continuity from trial to operation	High for statutory data-provision authority and governance; medium for project-specific continuity; components reported separately under Table 1 and A2
KZ / C3	Low	Procurement Law No. 106-VIII (2024); Order No. 687 (2024); AI Law (2025 enacted text)	General procurement law and procedural rules identified	Recurring AI trial-to-acquisition provision not located; historical implementing texts not exhaustively verified	Provisional low in the consulted architecture; incomplete retrieval limits any broader absence claim
KZ / C4	Medium	AI Law (2025 enacted text); transformation maps; ministry reporting on 2025 (2026)	Legal responsibility provisions; national indicator systems	No standardized, procurement-recognized pilot evaluation record located	KPIs and oversight exist but are not consistently procurement-relevant; matches Table 1 “medium”

KZ / C5	Medium	Concept 2024–2029; Digital Qazaqstan (2026)	Talent, dataset, and local-product priorities; shared platform lowers entry cost	No standard AI capability-transfer package in procurement or contract documents located	Encouragement without contracted obligations is Table 1 “medium”
AZ / C1	Medium	Council instrument (2026c); first implementation report (2026b)	Council; 58 action-plan initiatives; roadmaps prepared with 40 institutions, 13 approved or at approval stage	No demonstration that each AI pilot begins with named owner, team, and acquisition budget	Participation structures exist; standing ownership-at-entry not shown
AZ / C2	Medium	AI Strategy (2025); Action Plan (2026a)	Commitments to data-pool development, interoperability, and the once-only principle	Test-to-operation access protocol still being built	Lawful direction and infrastructure explicit; project-level continuity uneven
AZ / C3	Medium	Action Plan (2026a); Procurement Law (2023)	Action 8.3.7 proposes sandbox integration; action 8.2.6 addresses startups in state-enterprise procurement	Separate prospective actions; no automatic purchase entitlement or unified recurring route; sandbox deadline December 2026	Promised but procedurally incomplete mechanism; capped at “medium” per A2
AZ / C4	Medium	Action Plan (2026a); ASAN e-service evaluation research	Responsible officials, quarterly KPIs, user-satisfaction measurement	AI-specific criteria (error, oversight, model drift) and procurement recognition not yet specified	Oversight exists; procurement-relevant AI evaluation record incomplete
AZ / C5	Medium	Action Plan (2026a); INNOLAND programs	Explicit local-product and knowledge-transfer actions	Contract-level deliverables (Documentation, maintenance, monitoring) pending (documentation, maintenance, monitoring) pending	Encouraged, not yet contracted

KR / C1	medium-high	PBA Art. 5(1) (2); MOFE designation regulation (2026); PPS program pages (n.d.)	Demand-proposed route and pilot purchase embed a using institution that signs the evaluation	Supplier-proposed route permits designation before any institution owns a problem	Two recurring routes differ on the coded dimension; range reported per A2
KR / C2	Medium	PBA; Enforcement Decree Art. 33	Public users test in their own environments (ecological validity)	Sectoral privacy, interoperability, and security rules remain decisive per product; not settled by procurement rules	Trial access identified; governance for test-to-operation continuity incompletely evidenced under the common C2 rule
KR / C3	High	PBA Art. 27; Enf. Decree Art. 33; State Contracts Act Enf. Decree Art. 26; PPS Notice 2026-19; 2026 basic plan (2025)	Designation; conditional negotiated-contract eligibility; direct agency purchasing or central PPS pilot purchasing; result reporting	Ordinary three-year designation, extendable by up to three years; separately determined periods possible under the stated exception; demand not guaranteed; program totals not AI-specific	Law-backed recurring sequence meets Table 1 “high”; caveats retained in narrative rather than lowering the architectural score
KR / C4	High	PBA Art. 27(4); Enf. Decree Art. 33; PPS Notice 2026-19, Arts. 29, 33, 36–39, 40-3; PPS timing notice (2026b)	Approved pre-use plans; institution-head completion reports; user feedback; inspection provisions; publication; statutory liability protection	Dedicated AI criteria await application after the cutoff; discretionary checks do not establish continuous AI monitoring or effectiveness	Criteria, public-user sign-off, recorded feedback, inspection provisions, and liability allocation support Table 1 high at the institutional level
KR / C5	Medium	PPS program design; Yim et al. (2024)	Reference-customer and certification effects for startups and smaller firms	No standard requirement transferring maintenance, monitoring, or documentation capability to public organizations	Market-signal strength does not satisfy Table 1 “high,” which requires contracted transfer

Source: Author's coding. Abbreviations: PBA = Procurement Business Act; KZ = Kazakhstan; AZ = Azerbaijan; KR = South Korea.

LOW-LEVEL PROGRESS, HIGH-LEVEL FRAGILITY: THE SUSTAINABILITY GAP IN ANTI- CORRUPTION REFORM IN KYRGYZSTAN

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ABSTRACT. *Anti-corruption reform in Kyrgyzstan has generated measurable institutional and administrative outputs, yet its accountability function is less durable than formal institutionalization suggests. This article develops the concept of the sustainability gap, defined as the post-adoption erosion of a reform's capacity to constrain power, and applies it to three reform domains: public procurement transparency, digital service delivery, and high-level anti-corruption enforcement. Using a qualitative case study design and a process-tracing-informed analysis, it draws on legal and policy documents, donor and institutional reports, governance indicators, investigative reporting, and publicly presented aggregate survey findings. The findings reveal differentiated trajectories. The public procurement portal generated open data that investigative journalists used to scrutinize politically connected contracts, but its accountability function weakened after it began to impose political costs. Digital service delivery proved more durable because it reduced routine bureaucratic discretion without directly threatening elite resource allocation. High-level enforcement remained visible but lacked consistent, transparent, and institutionally independent follow-up. The comparison shows that the sustainability gap is shaped by donor and project-cycle dependence, limited domestic ownership, and the narrowing of civic space, which weaken the actors able to convert formal transparency into accountability. The article argues that external governance support should be assessed not only by adoption and technical outputs, but also by whether reforms continue to enable scrutiny and constrain power after political costs emerge.*

KEYWORDS: *anti-corruption, sustainability gap, external governance, accountability, Kyrgyzstan.*

1. INTRODUCTION

Anti-corruption reform has been a recurring priority in Kyrgyzstan's post-Soviet political development and one of the main areas of external governance support. Over the past two decades, international actors, including the European Union, UNDP, OSCE, USAID, the OECD, international financial institutions, and bilateral partners, have supported reforms in transparency, public finance management, digital governance, procurement oversight, civil society monitoring, and rule-of-law institutions (European Commission, 2021; UNDP Kyrgyzstan, 2025; OECD, 2024).

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These efforts have produced visible results: laws have been adopted, strategies drafted, digital platforms built, and monitoring frameworks established.

The aim of this article is to explain why externally supported anti-corruption reforms in Kyrgyzstan display uneven post-adoption durability and under what conditions their accountability functions are sustained or weakened. The issue is not whether anti-corruption reforms exist in Kyrgyzstan, or whether they produce initial results. In several areas, they clearly do. Digital service delivery has reduced some forms of routine bureaucratic discretion. Procurement transparency mechanisms have generated data that civil society actors and investigative journalists have used to scrutinize state contracts. Enforcement bodies continue to pursue high-profile cases. What remains less clear is why some reforms retain their technical functionality while others lose their accountability value over time, and why this erosion is more visible in politically sensitive domains than in low-level administrative reform.

This article approaches this uneven pattern through the concept of a sustainability gap: a post-adoption gap between formal institutionalization and the continued ability of reforms to generate accountability. A reform may continue to operate technically while no longer constraining power. A digital platform may deliver services efficiently without touching high-level corruption. A procurement system may remain formally in place while its legal scope is narrowed. An enforcement apparatus may produce visible arrests while follow-up remains opaque. The key question, therefore, is not simply whether anti-corruption reform has been adopted, but whether it continues to generate accountability after adoption.

The Kyrgyz case shows that reform durability depends not only on external support or formal design, but also on the political sensitivity of the reform domain. In a low-conditionality environment, external actors can help generate reform outputs, but they have limited capacity to protect those reforms once they begin to constrain politically sensitive interests. Durability depends on whether reforms become embedded in domestic institutions and whether civic actors, journalists, and oversight bodies are able to defend their accountability function. Low-level administrative reforms are more likely to endure because they improve service delivery without directly threatening elite resource allocation. By contrast, reforms touching public contracts, state-owned enterprises, high-level enforcement, or politically connected actors become more fragile precisely when they begin to work.

The article contributes to debates on external governance, anti-corruption reform, and Central Asian governance by shifting attention from reform adoption to post-adoption durability. Existing research explains why reforms are difficult to adopt, implement, or enforce; this article asks what happens when reforms do begin to function but later lose part of their accountability value. It defines this process as the sustainability gap: post-adoption accountability loss, analytically distinct from non-adoption, implementation failure, or façade compliance.

Empirically, the article examines three reform domains. Public procurement transparency is the main case because it allows the sustainability gap to be traced across formal adoption, partial institutionalization, measurable accountability outputs,



and subsequent narrowing. Digital service delivery is used as a contrast case, showing how technical progress can be sustained without necessarily constraining high-level corruption. High-level anti-corruption enforcement is treated as a supporting illustration of the limits of accountability in politically sensitive domains, where visible enforcement coexists with concerns about selective application and limited transparency over outcomes.

The analysis draws on legal and policy documents, donor monitoring reports, civil society publications, investigative reporting, and governance indicators. Investigative reporting is treated not as legal evidence, but as a record of documented public accountability claims, particularly where official records and follow-up information are limited. The article proceeds as follows. Section 2 develops the conceptual framework around external governance, anti-corruption reform, and the sustainability gap. Section 3 explains the methodology and source base. Section 4 presents the findings across domestic political context, digital service delivery, public procurement transparency, and high-level enforcement. The final section discusses what the Kyrgyz case suggests about the limits of externally supported anti-corruption reform in politically sensitive domains.

2. LITERATURE REVIEW

2.1. From Implementation Gap to Sustainability Gap

This section develops the concept of the sustainability gap. It brings together three bodies of literature: external governance, anti-corruption reform, and Central Asian governance. External governance scholarship explains how international actors support reform adoption and implementation beyond their own borders. Anti-corruption research shows why formal integrity reforms often struggle to transform underlying power relations. Central Asian governance scholarship highlights the importance of informal networks, weak rule-of-law institutions, and authoritarian adaptation in shaping donor-supported reform. Taken together, these debates explain why reforms are difficult to adopt, implement, or enforce. They tell us less, however, about reforms that do begin to function, generate data, reduce discretion, or create public accountability claims, but later lose part of that capacity. This article addresses that problem through the concept of the sustainability gap.

2.2. External Governance under Weak Conditionality

The external governance literature has long examined how external actors promote governance, rule of law, transparency, and accountability reforms beyond their own borders. In the EU enlargement literature, conditionality is usually treated as the central mechanism of external influence. Compliance with reform requirements is linked to valued material or political rewards, most importantly the prospect of membership. Where membership incentives are credible and the rewards are substantial, external actors can exercise considerable leverage over domestic institutional change (Schimmelfennig & Sedelmeier, 2004).

Outside enlargement contexts, however, this mechanism operates under weaker conditions. In countries without a membership perspective, external actors lack the

strongest incentive structure through which conditionality works. Governance norms may still be promoted through technical assistance, policy dialogue, monitoring, and project funding, but their effects depend more heavily on domestic political conditions (Lavenex & Schimmelfennig, 2011; Börzel & Risse, 2012). External governance in such settings can support reform activity and formal adoption, but it is less able to guarantee that reforms will be maintained once they begin to impose political costs.

Kyrgyzstan is a low-conditionality case. It has no EU membership perspective, no accession process, and no strong material incentive structure linking compliance with anti-corruption reform to highly valued benefits (Lavenex & Schimmelfennig, 2009; Council of the European Union, 2019; European External Action Service, 2024; Boonstra, 2015). External governance support relies mainly on technical assistance, capacity-building, policy dialogue, monitoring, and project-based funding rather than hard conditionality (European Commission, 2021; UNDP Kyrgyzstan, 2025; OSCE Programme Office in Bishkek, n.d.; OECD, 2024). This does not make external governance irrelevant. It means that its influence is mediated by domestic institutions, political incentives, and the ability of local actors to sustain reform beyond the moment of adoption.

This distinction matters because formal adoption is not the same as durable institutionalization. Levitsky & Murillo conceptualize institutional strength through enforcement, meaning the degree to which formal rules are complied with in practice, and stability, meaning the extent to which institutions survive changes in power and preferences (Levitsky & Murillo, 2009). In weak institutional environments, externally supported reforms may generate formal institutions without ensuring durable enforcement, especially where impartial governance remains limited (Levitsky & Murillo, 2009; Rothstein, 2011; Mungiu-Pippidi, 2015). Governments may adopt the form of reform to gain legitimacy or satisfy external expectations while later weakening its substance when accountability becomes politically costly. This dynamic is particularly relevant in neopatrimonial and authoritarian governance contexts, where formal institutions often coexist with informal power networks and selective enforcement (Lewis, 2012; Cooley & Heathershaw, 2017). The article therefore focuses not on shallow adoption alone, but on a more specific post-adoption problem: the weakening of reforms that had already begun to produce practical accountability effects.

2.3. Mediated Influence and Reform Ownership

External governance in Kyrgyzstan operates through a dense ecosystem of donors, international organisations, technical experts, NGOs, local partners, and project-based implementation structures (Lavenex & Schimmelfennig, 2009; Börzel & Risse, 2012; Kolstad et al., 2008; Sampson, 2010). For domestic actors, the EU, UNDP, OSCE, OECD, USAID, and other external providers may appear less as separate sources of authority than as parts of a wider reform architecture. Anti-corruption reform is therefore filtered through multiple frameworks, priorities, reporting requirements, and project cycles. This can generate reform activity, but it can also make reform durability dependent on whether externally supported mechanisms acquire domestic political and institutional support beyond the life of a project.

Donor-supported reform often produces visible outputs: strategies, action plans, legal amendments, digital tools, training programs, and monitoring frameworks. These outputs matter, but they do not necessarily secure reform sustainability. Where reform

capacity remains concentrated in donor-funded projects, expert networks, or temporary implementation units, institutional memory and political momentum may weaken once funding ends or project personnel leave (Kolstad et al., 2008; Sampson, 2010; OECD, 2024). The multiplication of external frameworks and reporting demands can also fragment reform ownership, especially when recipient institutions are expected to absorb several overlapping agendas at once.

Ownership is therefore central to reform sustainability. This connects to the aid effectiveness literature's emphasis on country ownership and the limits of donor-driven reform (OECD, 2005; Kolstad, Fritz, and O'Neil, 2008; Booth, 2011). Ownership has both institutional and societal dimensions. Institutional ownership refers to whether a reform becomes embedded in permanent state capacity, supported by resources, expertise, and political commitment beyond a donor project cycle. Societal ownership refers to whether civic actors and the wider public recognize the reform as politically valuable and are able to defend it. Anti-corruption reforms are more likely to sustain their accountability function when supported by domestic reform carriers: investigative journalists, watchdog organizations, civil society groups, independent experts, and reform-oriented officials. Where these actors are weak, dependent on external funding, or exposed to political pressure, accountability mechanisms remain vulnerable to neglect, hollowing, repurposing, or reversal.

Public demand matters because transparency mechanisms rarely defend themselves. Anti-corruption scholarship has shown that corruption is not only a problem of formal institutional design, but also of collective action, social expectations, and the persistence of particularistic access to public resources (Rothstein, 2011; Mungiu-Pippidi, 2015; Persson et al., 2012). Citizens may oppose corruption in general while still lacking the organizational capacity, legal protection, or technical information needed to sustain specific accountability claims. Demand can therefore remain latent rather than mobilized. Bauhr and Grimes (2014) show that transparency does not automatically generate public accountability demand. In high-corruption contexts, exposure to corruption may produce resignation rather than indignation, especially where citizens perceive sanctioning mechanisms as weak or ineffective. Under such conditions, reform reversal can remain politically low-cost because there is no protected constituency capable of defending the reform as a public accountability commitment.

This is central to the Kyrgyz case. Societal demand for accountability appears to exist at a broad political level, but it does not always translate into sustained, technically informed pressure over specific transparency mechanisms such as procurement, budgets, or implementation monitoring. At the same time, shrinking civic space, pressure on investigative media, and weak institutional safeguards limit the actors who can translate technical transparency into public accountability (Freedom House, 2026; V-Dem Institute, 2025; Human Rights Watch, 2025). The sustainability of anti-corruption reform therefore depends not only on whether information is disclosed, but also on whether there are actors able to use that information safely and effectively.

2.4. Defining the Sustainability Gap

The implementation gap is well established in public policy literature (Pressman & Wildavsky, 1973; Hill & Hupe, 2002). It refers to the distance between formal adoption and meaningful implementation: a reform may be promised or legally adopted but remain ineffective in practice because of limited resources, weak political commitment,

coordination, or insufficient institutional capacity. The sustainability gap describes a related but analytically distinct problem.

A sustainability gap occurs when a reform moves beyond formal adoption, begins to generate accountability outputs, and then loses part of that function over time. The concept therefore excludes non-adoption, purely symbolic adoption, and reforms that never produced meaningful accountability effects. It applies to reforms that once produced data, enabled monitoring, reduced discretion, or created channels of public scrutiny, but subsequently lost part of their accountability capacity.

The empirical focus is the accountability function of reform. Anti-corruption mechanisms should be assessed not only by whether they formally exist, but also by whether they enable public scrutiny, constrain discretion, expose abuse, support equal enforcement, or allow civic and institutional actors to monitor the use of public power (Schedler, 1999; Bovens, 2007). The empirical analysis therefore traces a sequence from formal adoption and partial institutionalization to the weakening, narrowing, hollowing out, repurposing, or loss of a reform's accountability function.

This loss may take several forms. A transparency mechanism may be legally narrowed so that politically sensitive spending is removed from public scrutiny. An enforcement body may remain active but apply anti-corruption tools unevenly. A digital platform may continue to deliver services while its oversight structure becomes more centralized and less independently monitored. In each case, the reform does not necessarily disappear. It may remain formally or technically present while losing its capacity to constrain power (Levitsky & Murillo, 2009; Mungiu-Pippidi, 2015).

The distinction is especially important for reforms that continue to work technically but no longer sustain an accountability function. Digitalization is a useful contrast case. E-government platforms may reduce face-to-face bureaucratic contact and limit opportunities for petty corruption, which represents real administrative progress (Andersen, 2009; Elbahnasawy, 2014). Yet technical functionality should not be conflated with accountability sustainability. A platform may improve service delivery without exposing elite networks, constraining high-level resource allocation, or empowering independent oversight. The empirical section returns to this distinction by comparing digital service delivery with procurement transparency and high-level enforcement.

The claim is not that external governance fails uniformly. External support can generate real reform outputs, especially in technical and administrative domains (Lavenex & Schimmelfennig, 2011; Börzel & Risse, 2012). The sustainability gap occurs when those outputs survive formally or technically while losing their capacity to constrain power.

3. METHODOLOGY

This article examines the sustainability of anti-corruption reform in Kyrgyzstan through a qualitative case study design. The approach is well suited to the subject matter: the sustainability gap — defined here as the weakening of a reform's accountability function after formal adoption — is not a discrete measurable outcome but an unfolding process shaped by political, institutional, and civic conditions. Case study research allows for the kind of context-sensitive analysis this requires, bringing together diverse forms

of evidence, including legal and policy documents, donor and institutional reports, governance indicators, investigative reporting, and publicly presented aggregate survey findings (Yin, 2017; George & Bennett, 2005).

Kyrgyzstan is a suitable case for this article because anti-corruption reform there has been shaped by sustained donor support, while different reform areas have followed visibly different trajectories. Public procurement transparency, digital service delivery, and high-level enforcement have all been part of the reform agenda, but they do not carry the same political weight. Some reforms mainly improve administrative efficiency, while others touch more directly on elite discretion and the allocation of public resources. The post-2020 context of executive recentralization and shrinking civic space makes this variation especially important, as it allows the article to examine whether adopted reforms can continue to perform an accountability function once they begin to generate political costs.

The analysis draws on three principal types of evidence. Legal and policy documents form the first layer, used to trace how Kyrgyzstan's anti-corruption framework has evolved over time. These include the 2015 Law on Public Procurement, the 2021 Constitution of the Kyrgyz Republic, and secondary legislation on procurement by state-owned enterprises. Reading these documents together makes it possible to identify how reforms were formally designed, where transparency obligations changed, and how institutional rules were narrowed or reconfigured.

Donor program documents, monitoring reports, and governance datasets constitute the second layer, situating these reforms within the broader external support architecture. Reports and materials from the European Commission, UNDP, OECD, and the World Bank are used to assess what kinds of reform outputs external actors supported or monitored. Governance indicators from Freedom House, V-Dem, the Bertelsmann Transformation Index, and World Bank datasets provide wider context on civic space, rule of law, voice and accountability, and public sector governance.

Civil society publications and investigative reporting form the third layer, used to examine how transparency mechanisms operated in practice. Reporting from Temirov Live, Kloop Media, Eurasianet, and OCCRP is not treated as legal evidence. Instead, it serves as a record of documented public accountability claims, particularly in areas where official records or follow-up information are limited. Aggregate survey findings publicly presented by Mukanova (2026) at Kyrgyzstan-Türkiye Manas University, drawing on responses from 5,471 civil servants across 20 ministries and agencies, are also used as supplementary evidence from within state institutions.

During the author's research secondment at the OSCE Academy in Bishkek between March and June 2026, a small number of non-attributable background consultations were held with academics and policy specialists familiar with governance and anti-corruption reform in Kyrgyzstan. The consultees were selected purposively on the basis of their academic or professional expertise in the reform areas examined. The consultations were documented only for contextual reference and were used solely to inform the reading of documentary and secondary sources. They were not coded or systematically analyzed as

an interview dataset, no statements are quoted or attributed, and they were not assigned independent evidentiary weight in the analysis.

The three principal bodies of evidence are read together through a process-tracing-informed approach, tracing how reforms moved from formal adoption to partial institutionalization and then either retained or lost their accountability function (George & Bennett, 2005; Bennett & Checkel, 2015). The analysis focuses on three reform domains: public procurement transparency, digital service delivery, and high-level anti-corruption enforcement. These domains are not intended to constitute a representative sample; they were selected because they vary in political sensitivity, making it possible to observe the sustainability gap under different conditions. Public procurement serves as the main case, given that its trajectory can be traced from adoption and operational use through to subsequent legal narrowing. Digital service delivery functions as a contrast case, illustrating how technical progress may be sustained without necessarily producing upward accountability. High-level enforcement serves as a supporting illustration of the gap between visible anti-corruption action and sustained institutional accountability.

Table 1 uses qualitative comparative categories rather than numerical scores. Formal adoption and technical implementation are assessed according to whether a reform was legally established and operational in practice; accountability output according to whether it reduced discretion or enabled monitoring and public scrutiny; political sensitivity according to the extent to which it affected elite discretion or the allocation of public resources; and sustainability outcome according to whether these accountability functions were retained, narrowed, or weakened after adoption. The labels “high”, “low–medium”, and “indeterminate” summarize the documentary and reporting evidence discussed for each domain and are not intended as standardized quantitative measures.

Several limitations bear mentioning. The study relies principally on legal and policy documents, donor and institutional reports, governance indicators, investigative reporting, and publicly presented aggregate survey findings, which means it does not fully capture how ordinary citizens understand, value, or mobilize around specific accountability mechanisms — a question that would require a different research design based on citizen-level evidence. Investigative reporting is used with care, but it has not been independently verified by the author and therefore carries evidentiary limits. The findings are accordingly best read as analytically rather than statistically generalizable: the sustainability gap reflects a pattern observable in Kyrgyzstan and potentially relevant to similar reform contexts, not a claim that can be extended from a single case to a wider population (Yin, 2017).

4. FINDINGS

The findings are organized around the main areas in which anti-corruption reforms have unfolded, rather than as a step-by-step chronology. Each subsection asks whether reforms moved beyond formal adoption or technical implementation and became durable accountability mechanisms, or whether their accountability function weakened over time. The argument is not that anti-corruption reform in Kyrgyzstan has simply failed. Rather, the findings show a more uneven pattern: reforms are more likely to

endure where they improve routine service delivery but become more fragile when they touch politically sensitive areas of state power, public resources, and elite-linked accountability.

4.1 Domestic Political Context: Recentralization and Shrinking Accountability Space

The sustainability of anti-corruption reforms in Kyrgyzstan needs to be read against the country's post-2020 political context. Since the political transition of 2020–2021, executive authority has become more centralized, while parliamentary and judicial checks have weakened and pressure on independent media and civic actors has increased (OSCE Office for Democratic Institutions and Human Rights and Venice Commission, 2021; Freedom House, 2024; Human Rights Watch, 2025; Bertelsmann Stiftung, 2026). This matters because transparency mechanisms do not generate accountability on their own. For disclosed information to become public scrutiny, sanction, or policy correction, there must also be institutions, journalists, civil society organizations, and legal safeguards able to act on that information (Fox, 2007; Fox, 2015; Bauhr & Grimes, 2014).

The changes introduced after 2020 made this problem more visible. The 2021 constitutional reforms strengthened presidential authority, reduced the number of members of parliament from 120 to 90, and raised concerns about the autonomy of parliament, courts, and enforcement institutions (OSCE Office for Democratic Institutions and Human Rights and Venice Commission, 2021; Constitution of the Kyrgyz Republic, 2021; United Nations Kyrgyzstan, 2023). At the same time, the space for independent scrutiny narrowed. Investigative media and civic actors faced growing legal and political pressure, while the 2024 foreign representatives law created new risks for foreign-funded civil society organizations (Human Rights Watch, 2025; ICNL, 2024; Reporters Without Borders, 2026). This matters because anti-corruption transparency depends not only on legal or digital mechanisms, but also on the actors able to use them.

This political setting made reform sustainability uneven. Low-level administrative reforms, especially digital services that reduce routine contact between citizens and officials, could continue because they improved service delivery without directly challenging politically sensitive networks. Reforms touching public contracting, state-owned enterprises, elite-linked transactions, or high-level enforcement were more exposed. In these areas, transparency was not just a technical instrument; it could also become a constraint on discretionary power (Bovens, 2007; Schedler, 1999; Fox, 2015).

This broader accountability environment helps explain the pattern traced in the following subsections. Kyrgyzstan's anti-corruption reforms show genuine progress where technical modernization reduces petty bureaucratic discretion. Yet their accountability function becomes more fragile when reforms depend on civic oversight, independent investigation, judicial autonomy, or sustained political tolerance (Freedom House, 2024; Human Rights Watch, 2025; Bertelsmann Stiftung, 2026). The following subsections examine this divergence through digital service delivery, public procurement transparency, and high-level anti-corruption enforcement.

External support remains important in this setting, but its effects are mediated by domestic political and institutional conditions (Lavenex & Schimmelfennig, 2011; Börzel & Risse, 2012). Donor programs can help create legal frameworks, digital tools, monitoring systems, and technical capacity, yet they cannot by themselves ensure that reforms retain their accountability function once they begin to generate political costs

(Kolstad, Fritz, and O'Neil, 2008; Booth, 2011; OECD, 2024). Where reform capacity is tied to project cycles, external expertise, or temporary implementation structures, sustainability depends on whether domestic institutions and civic actors are able to carry the reform beyond the moment of adoption. The continued role of the European Commission, UNDP, OSCE, and OECD in policy support, monitoring, and technical assistance shows that important elements of reform capacity remained organized through externally supported programs (European Commission, 2021; UNDP Kyrgyzstan, 2025; OSCE Programme Office in Bishkek, n.d.; OECD, 2024). At the same time, pressure on investigative media and new legal risks for foreign-funded civil society organizations weakened the domestic actors capable of defending specific accountability mechanisms (Committee to Protect Journalists, 2024; Human Rights Watch, 2025; ICNL, 2024). Together, these developments provide the empirical basis for the mechanisms of donor and project-cycle dependence, limited domestic ownership, and narrowing civic space.

4.2. Low-Level Administrative Anti-Corruption: Technical Progress without Upward Accountability

The most visible progress in Kyrgyzstan's anti-corruption reform trajectory has taken place at the level of everyday administrative services. Digital service delivery, e-government platforms, and electronic public services can reduce opportunities for petty corruption by limiting direct interaction between citizens and officials (Andersen, 2009; Elbahnasawy, 2014). When documents, certificates, payments, and applications move online, citizens have fewer reasons to negotiate informally with bureaucrats, and officials have fewer opportunities to exercise routine discretion.

Tunduk is the clearest example of this kind of progress. Designed as an interagency electronic interaction system, it allows government bodies, local authorities, and commercial organizations to exchange data securely, while reducing the need for citizens to collect and submit paper certificates manually (Tunduk, n.d.). In practice, it has become a core part of Kyrgyzstan's digital public infrastructure, connecting government databases and giving citizens and businesses access to state services through a unified authenticated interface (Tunduk, n.d.; LaForge & Kapur, 2026). By early 2025, the Tunduk mobile application included 171 government services and had processed 16 million requests during 2024; official figures also reported substantial savings in citizens' time and administrative costs (Trend.az, 2025). By August 2025, the combined portal and application offered 182 digital government services, including services for small and medium-sized enterprises (Kabar, 2025). In 2025, state and local government bodies were also required to stop requesting paper certificates where the relevant information was already available through Tunduk (Akchabar, 2025; 24.kg, 2025).

These developments matter because they reduce the everyday spaces in which petty corruption can occur. They do not, however, prove a direct causal reduction in corruption, nor do they show that digitalization limits higher-level discretion over public resources. Tunduk's main significance therefore lies in service delivery and administrative simplification. It may make routine interactions with the state faster, less discretionary, and less dependent on personal contact, while leaving wider accountability relations largely unchanged.

The 2026 transfer of state management powers over Tunduk OJSC from the digital development authorities to the Presidential Administration/Department of Presidential Affairs reflects this ambiguity (24.kg, 2026b). On one hand, the transfer could improve coordination and implementation capacity. On the other hand, it could make the platform more dependent on executive control. The key question is therefore not simply whether Tunduk continues to function, but whether its new institutional position strengthens or weakens its accountability role over time. For this reason, Tunduk captures the broader pattern examined in this article: a reform may remain technically useful without becoming a durable constraint on power.

4.3. Public Procurement and Contracting Transparency: Formal Mechanisms and Accountability Loss

Public procurement is the strongest empirical example of the sustainability gap in Kyrgyzstan's anti-corruption reforms. Unlike low-level administrative digitalization, procurement transparency concerns the allocation of public money, state contracts, and relationships between public authorities and politically connected actors. Its trajectory shows how a reform can be formally adopted, partially institutionalized, and still lose part of its accountability function over time.

Kyrgyzstan adopted a new Law on Public Procurement in 2015, and public procurement was then moved onto the official electronic portal zakupki.gov.kg (Kyrgyz Republic, 2015; zakupki.gov.kg, n.d.). This framework was subsequently replaced by the Law of the Kyrgyz Republic No. 27 "On Public Procurement," adopted on April 14, 2022 (Kyrgyz Republic, 2022). The portal remained the main electronic platform for public procurement, providing information on procurement procedures from announcement to contract award and enabling both procuring entities and suppliers to participate electronically (Baizakova, 2020). In design, this represented a significant transparency reform: procurement information, including requirements and evaluation criteria, was made publicly accessible. The reform also received sustained donor support from the World Bank and the Asian Development Bank, and later from USAID, making it one of the clearest examples of externally supported transparency infrastructure in Kyrgyzstan (World Bank, 2016; Transparent Public Procurement Rating, n.d.; Uselman, 2024).

The portal was not only a formal requirement. It generated usable data, structured tender procedures, and created openings for external scrutiny (Baizakova, 2020). Available evidence suggests that competitive and open procurement procedures also produced measurable savings. According to the Public Procurement and Logistics Observatory, transparent procurement procedures among state and municipal enterprises and state-owned joint-stock companies saved 3.0 billion soms in 2021 (Public Procurement and Logistics Observatory, 2022). More importantly for this article, the portal gave civic actors a tool with which to monitor politically sensitive contracts. In July 2021, investigative journalists associated with Temirov Live used procurement data to show that Uuna, a state-controlled entity responsible for driving licenses and vehicle plates, had awarded a lucrative contract to a company affiliated with the daughter of a close acquaintance of President Japarov (Eurasianet, 2022).

This accountability function later weakened. Under President Japarov, changes to the public procurement framework reduced transparency in politically sensitive procurement domains. State-owned enterprises and joint-stock companies were exempted from the public procurement law, a major change given their weight in public

spending. The UN's 2022 Common Country Analysis estimated that procurement by companies with more than 50 percent state ownership amounted to 25.3 billion soms per year, or 59.7 percent of all public procurement, and warned that their exclusion from open procurement reduced the ability of watchdog and anti-corruption organizations to trace potentially fraudulent schemes (United Nations Kyrgyzstan, 2023). As a result, procurement by state-controlled companies no longer had to follow the same tender and publication requirements. Contemporary reporting similarly warned that the changes would move a substantial share of public spending into less visible channels, making it harder for citizens to see how funds were allocated (Eurasianet, 2022; Public Procurement and Logistics Observatory, 2022; Reznikova & Irgebaeva, 2022). Later changes to procurement formats for state-owned enterprises in 2026, including expanded exemptions and revised thresholds for simplified procurement, reinforced concerns that politically sensitive procurement would remain subject to weaker transparency requirements than ordinary public procurement (24.kg, 2026a).

This trajectory captures the sustainability gap. The issue was not the absence of reform. Nor was it that the procurement portal failed technically. The portal existed, produced data, and was used by journalists and civic actors. The problem was that its accountability value became vulnerable once it began to expose politically sensitive relationships.

Survey evidence from within state institutions points to the same tension. In a survey of 5,471 civil servants from 20 ministries and agencies presented at Kyrgyzstan-Türkiye Manas University in May 2026, public procurement was identified as one of the main corruption-risk areas, with 19 per cent of respondents naming it as a risk domain. At the same time, a substantial share assessed the procurement system as transparent or moderately transparent (Mukanova, 2026). This coexistence of perceived corruption risk and formal transparency is important. It suggests that a system may be seen as procedurally transparent while still failing to constrain politically sensitive contracting in practice.

The weakening of civic accountability actors further reduced the political cost of rollback. Temirov Live had shown that procurement data could be turned into public accountability claims (Eurasianet, 2022). Yet its suppression removed one of the few actors able to use that data effectively and publicly (Committee to Protect Journalists, 2024; Human Rights Watch, 2025). When journalists and watchdogs are prevented from translating transparency into scrutiny, the formal existence of data becomes less politically consequential. In this sense, both sides of the accountability chain weakened at the same time: transparency mechanisms were narrowed, and the actors capable of using them came under pressure.

4.4. High-Level Anti-Corruption Enforcement: Visibility without Equal Accountability

In politically sensitive areas, anti-corruption action can remain visible while still falling short of sustained, equal, and transparent accountability. At the high political level, Kyrgyzstan continues to see arrests, investigations, and public announcements that signal state action against corruption. Such actions may respond to public frustration and create the appearance of strong enforcement. The more difficult question is whether enforcement is systematic, transparent, and equally applied. Without independent judicial oversight, transparent follow-up, and public access to outcomes, visible enforcement is difficult to assess as institutional accountability. Freedom House's

reporting on customs-related corruption cases and the 2022 Health Ministry case both reflect this ambiguity: state action took place, but questions remained about whether the process was transparent, consistent, and institutionally independent (Freedom House, 2024; OCCRP, 2022).

Secondary reporting and the broader documentary record raise a similar concern. High-level anti-corruption enforcement appears particularly vulnerable to selective use, especially where politically exposed actors may lose protection while loyal or well-connected figures remain less exposed. Public approval of high-profile arrests may reflect genuine anger toward corruption. Yet this demand is only partially satisfied if citizens cannot monitor recovered assets, judicial outcomes, or the equal application of law across political networks.

Survey data from within state institutions reinforces this point. In the same survey of 5,471 civil servants across 20 ministries and agencies, only 25.3 per cent of respondents who had encountered corruption-related facts believed they were fully protected. Significant shares either reported no protection for whistleblowers or lacked information about available protection mechanisms (Mukanova, 2026). Because these figures come from within the state apparatus, they are especially relevant. They suggest that internal accountability mechanisms remain weak, even as anti-corruption enforcement remains publicly visible.

High-level enforcement may therefore be active and visible without becoming a stable accountability mechanism. In a context of weak courts, limited parliamentary oversight, pressure on investigative media, and legal risks for civic actors, citizens have fewer channels through which to judge whether enforcement is systematic or selective (Freedom House, 2026; Human Rights Watch, 2025; Bertelsmann Stiftung, 2026). Visibility can generate legitimacy, but it does not necessarily complete the accountability chain.

The three reform areas therefore point to the same underlying pattern. Digital service delivery has continued to expand because it improves administrative efficiency and reduces routine discretion without directly challenging high-level political interests. Public procurement transparency became more fragile once it enabled scrutiny of politically sensitive contracts. High-level enforcement remains visible, but its accountability value depends on transparent follow-up, equal application, and institutional independence. The sustainability gap therefore lies not in the absence of reform, but in the weakening of accountability once reforms begin to constrain politically sensitive power relations.

Table 1. Reform Sustainability across Three Domains

Reform domain	Formal adoption/ technical implementation	Accountability output	Political sensitivity	Sustainability outcome
Digital service delivery (Tunduk)	High	Low–medium: reduces routine discretion and face-to-face contact	Low–medium	Technically sustained, but limited upward accountability

Public procurement transparency (zakupki.gov.kg)	High	High: enables scrutiny of contracts and suppliers	High	Weakened through legal narrowing and pressure on civic users
High-level anti-corruption enforcement	High	Indeterminate: visible enforcement, but insufficient transparency to assess accountability outcomes	High	Visible but uneven; weak sustained accountability

Source: Author's own compilation based on policy documents, governance indicators, and investigative reporting

As Table 1 summarizes, all three domains display high levels of formal adoption or technical implementation but differ in their accountability outputs, political sensitivity, and sustainability outcomes. Taken together, the findings show that reforms are more likely to endure where they improve routine service delivery, but become more fragile when they touch politically sensitive areas of state power, public resources, and elite-linked accountability.

5. DISCUSSION

5.1. The Sustainability Gap as Post-Adoption Accountability Loss

The findings show that anti-corruption reform in Kyrgyzstan cannot be understood only through adoption, implementation, or formal compliance. Some reforms were adopted, partially operationalized, and even used for accountability purposes before their public accountability function weakened. This is the dynamic captured by the sustainability gap: reforms may remain visible as laws, platforms, strategies, or enforcement actions, while losing their ability to constrain discretion, enable public scrutiny, or support equal accountability. The findings suggest that this is not simply a failure of adoption, but a failure to protect accountability functions once reforms become politically consequential.

5.2. How the Mechanisms Work Together

As Table 2 summarizes, the sustainability gap is produced by several mechanisms working in combination, rather than by any single institutional failure. Donor and project-cycle dependency weakens domestic ownership, while limited public demand reduces the political cost of reversal. At the same time, weakened reform carriers, including investigative journalists, NGOs, and watchdog organizations, reduce the capacity to defend accountability functions when they are needed most (Kolstad et al., 2008; Sampson, 2010; Bauhr & Grimes, 2014; Mungiu-Pippidi, 2015; Fox, 2015). Under these conditions, accountability loss can be framed as administrative rationalization or legal simplification rather than as democratic backsliding.

Table 2. Mechanisms Producing the Sustainability Gap

Mechanism	How it works	Evidence in Kyrgyzstan
Donor/project-cycle dependence	Reform capacity remains partly tied to external funding, expertise, monitoring frameworks, and temporary implementation structures	External support helped generate legal, digital, and monitoring outputs, but could not by itself secure the long-term accountability function of reforms
Limited domestic ownership	Reforms lack sufficiently embedded institutional and societal defenders once they become politically costly	Weak reform carriers, limited public mobilization around specific transparency mechanisms, and reliance on civic actors exposed to political pressure
Narrowing civic space	Actors who translate transparency data into public accountability face legal, political, or institutional pressure	Pressure on Temirov Live and Kloop Media, legal risks for NGOs, and the 2024 foreign representatives law

Source: author's own compilation

This interaction is clearest in the procurement case. The portal existed, functioned, and was used by investigative journalists to expose politically sensitive contracting relationships. The problem was not that the reform was merely symbolic, nor that the technical design failed from the outset. Rather, the social and institutional conditions needed to sustain procurement transparency were too fragile once the mechanism began to generate political costs. The sustainability gap emerges precisely here: not because the reform never worked, but because the conditions required to keep it working were never adequately secured.

5.3. Why Accountability Travels Downward More Easily Than Upward

In the Kyrgyz case, accountability tends to travel downward more easily than upward. Low-level technical reforms can reduce routine bureaucratic discretion without directly threatening patronage networks. High-level accountability reforms operate differently. Procurement transparency, independent enforcement, and scrutiny of politically connected actors touch the mechanisms through which power and public resources are distributed. For this reason, they are more politically sensitive and more exposed to narrowing, selective implementation, or reversal.

A second reason is the absence of protected civic actors able to turn transparency into public pressure. High-level transparency mechanisms are rarely self-executing. Procurement data, asset declarations, audit findings, and enforcement records require actors who can interpret, publicize, and defend them (Fox, 2007; Fox, 2015). When investigative journalists, NGOs, and watchdog organizations are weakened, the social basis for upward accountability is weakened as well.

A related framing problem is visible within state institutions themselves. Survey data publicly presented at Kyrgyzstan-Türkiye Manas University found that 65.7 per cent of civil servant respondents identified low wages as the primary driver of corruption (Mukanova, 2026). Wage levels are a real structural concern, and this perception among

civil servants is not simply mistaken. But the framing matters analytically: when corruption is understood mainly as individual material deprivation rather than as political protection or patronage, the problem becomes technical rather than political. Accountability reform framed in these terms, as a matter of adequate pay and better procedures, is less likely to generate pressure for the kind of high-level scrutiny that would expose powerful actors. This framing tendency maps onto a wider pattern in external governance, where anti-corruption is routinely translated into administrative fixes, making the erosion of high-level accountability mechanisms harder to see and easier to accept.

5.4. Implications for External Governance and Central Asian Reform Politics

Adoption is rarely where external governance fails in Kyrgyzstan. The limits become visible later, when reforms begin to expose public contracts, state-owned enterprise spending, and the networks around politically connected actors. Platforms were built, data was published, and journalists used that data to reveal uncomfortable findings. What eroded was not the technical infrastructure itself, but the conditions under which it could continue to function as accountability. External support produced real outputs, but it could not secure the civic and institutional infrastructure needed to defend those outputs when reversal became politically convenient (Lavenex & Schimmelfennig, 2011; Börzel & Risse, 2012).

Technicalisation reinforces this dynamic. External governance programmes often translate anti-corruption into measurable activities: digital systems, compliance procedures, reporting indicators, capacity-building events, and administrative reforms (Kolstad et al., 2008; Sampson, 2010). This makes reform easier to adopt, but also easier to hollow out. If a reform is treated mainly as a project output rather than as a public accountability commitment, its weakening is unlikely to generate significant political resistance.

External governance frameworks should therefore assess not only whether a law was passed or a platform was built, but whether the actors capable of using those tools are protected. Investigative media, civic monitors, and watchdog organizations connect formal transparency infrastructure to actual public scrutiny; they are not peripheral to anti-corruption programming (Fox, 2015). The demand-side dimension extends beyond organized civil society as well. Governance reforms that remain concentrated within ministries, parliament, and the presidential administration — without wider public understanding, support, and participation — become easier to reverse once donor projects end. When civic space closes and donors focus primarily on technical outputs, reforms lose their social defenders and accountability is reduced to administration.

The argument also carries broader implications for the study of reform politics in Central Asia. Similar reform language — digitalization, transparency, public administration modernization, and anti-corruption commitment — circulates widely across the region, yet the same formal commitments can produce quite different sustainability outcomes depending on whether they are embedded in domestic institutions and defended by civic actors (Lewis, 2012; Cooley and Heathershaw, 2017). The sustainability gap concept may be useful comparatively in this respect, not to assert uniform failure, but to ask why some reforms retain their accountability function while others become formally intact but functionally depleted structures.

The sustainability gap should therefore not be read as a uniquely Kyrgyz problem. It points instead to a broader vulnerability of external governance in low-conditionality settings where civic space is narrowing and accountability carriers are politically exposed. The

question for comparative research is not whether reforms were adopted, but whether, and under what conditions, they continue to constrain power.

6. CONCLUSIONS AND LIMITATIONS

The core issue in externally supported anti-corruption reform is not only whether reforms are adopted, but whether they continue to constrain discretion and enable scrutiny after adoption. The Kyrgyz case shows that this durability varies across reform domains. Public procurement transparency moved well beyond formal adoption: the portal generated data, structured tender procedures, and was used by investigative journalists to expose politically sensitive contracting relationships. Yet its accountability function weakened once it began to disturb interests that the reform had not initially threatened. Digital service delivery, by contrast, has proven more durable because it improves administrative efficiency without directly exposing elite resource allocation or requiring sustained civic oversight. High-level enforcement reinforces this pattern: visibility should not be confused with accountability where follow-up, judicial independence, and equal application remain uncertain.

The article shifts attention from why reforms are adopted to the conditions under which adopted reforms continue to constrain power. Existing frameworks examine adoption and implementation, but they do not fully account for reforms that move beyond formal compliance and then lose their accountability function. The sustainability gap is therefore distinct from the implementation gap (Pressman & Wildavsky, 1973). It describes erosion after partial institutionalization, not failure before implementation. The conditions that explain adoption, including donor pressure, political windows, and technical assistance, are not necessarily the conditions that sustain accountability once reforms begin to affect entrenched interests.

The Kyrgyz case points to three mechanisms behind this gap. Donor and project-cycle dependency can concentrate reform capacity in temporary structures, leaving reforms vulnerable when funding or political attention shifts. Weak domestic ownership, both institutional and societal, means that reforms lack the embedded resources and protected constituencies needed to survive when they become politically inconvenient. The narrowing of civic space removes the actors, especially civic monitors and investigative media, who translate formal transparency into public accountability claims. When these mechanisms operate together, accountability loss can be presented as administrative adjustment rather than democratic backsliding, and reversal carries limited political cost.

Reform success should therefore not be measured through adoption rates or technical functionality alone. Procurement portals, legal frameworks, and digital platforms should also be assessed by whether they continue to enable public scrutiny and constrain discretion over time. Civic actors and investigative media are part of the sustainability infrastructure of anti-corruption reform, not peripheral to it. In low-conditionality settings, donor support focused on technical outputs while civic space contracts can produce reforms that remain formally present but become functionally hollow.

The study also has limitations. It relies mainly on legal and policy documents, donor and institutional reports, governance indicators, investigative reporting, and publicly presented aggregate survey findings. The non-attributable background consultations were not treated as an interview dataset and therefore do not provide systematic

evidence of practitioner or citizen perspectives. As a result, the study does not fully capture how ordinary citizens understand, value, or mobilize around specific accountability mechanisms. Citizen-level evidence, including public opinion research, formal qualitative interviews, or ethnographic work, would be needed to examine how public demand for accountability is formed, constrained, or mobilized.

Future research could examine whether similar sustainability gaps appear elsewhere in Central Asia and whether the low-level/high-level distinction holds across different political configurations. Public procurement would be a particularly productive comparative focus because it combines technical reform, public resource allocation, and political sensitivity in ways that make accountability loss observable. Further work should also examine civic coalitions, professional communities, and investigative media networks as carriers of reform sustainability.

Externally supported anti-corruption reform can produce real but uneven outcomes. The sustainability gap reframes the central question: not whether reforms are adopted, but whether the conditions under which they can continue to constrain power are themselves protected. In low-conditionality settings where civic space is contracting, that question points beyond formal institutions to the social and political conditions under which accountability can survive contact with power.

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CONFLICT OF INTEREST

The author declares no conflict of interest.

AUTHORS' CONTRIBUTIONS

ABÖ: conceptualization, methodology, investigation, formal analysis, writing – original draft, writing – review and editing.

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MEDIA-CONSTRUCTED MORALITY: COMPARING KAZAKHSTAN AND FRANCE IN REPATRIATION DEBATES

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ABSTRACT. *The territorial defeat of ISIS created pressure on states to repatriate citizens from areas of conflict, but the national approaches were quite heterogeneous. The study explores which frames were produced in the contemporary media in Kazakhstan and France on the issue of the repatriation of citizens affiliated with ISIS in 2019-2025 and how these frames were reflected in public discourse. Drawing on strategic culture and media framing theory, the research employs a comparative qualitative design combining framing analysis of 100 media texts (50 per country) and thematic analysis of 1,000 YouTube comments (500 per country). The results indicate that there are different media framing patterns: compassion was the most prevalent frame in Kazakhstan, while in the French media sample, the dominant frame was security. In Kazakhstan, security framing coexisted with humanitarian and rehabilitative concerns which were rooted in state responsibility and a sense of national reintegration. In France, the issues of accountability, citizenship and justice dominated more moral debate, which coexisted with security framing. The differences in public responses were reflected in the discussions: in the Kazakhstani comments, the issues were distributed across several themes, but the discussions were mostly approving of state policy, with French comments being marked by demands for sanctions and personal responsibility. The article introduces framing theory to the strategic culture literature by demonstrating that, in the face of overlapping transnational threats, there can be divergent national narratives of responsibility, legitimacy and belonging which shape public perceptions of counterterrorism and reintegration.*

KEYWORDS: repatriation, media framing, strategic culture, Operation Zhulan, foreign terrorist fighters.

1. INTRODUCTION

The territorial defeat of ISIS brought a fresh set of challenges to governments regarding the return of citizens affiliated with the group. The threat of peers helping ISIS did not end with the death of the “caliphate,” though, and countries had to face the possibility of their own citizens returning. Thousands of foreign members of ISIS were arrested in Iraq and Syria, where many remained in insecure detention camps under poor humanitarian conditions (Cook & Vale, 2019). The concerns that returning foreign fighters could pose risks to national security intensified (Hoffman & Furlan, 2020). As such, it became inevitable that states would have to deal with issues that arose in

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relation to citizens who had travelled to conflict zones to join the group. Comparative media coverage of repatriation in countries with similar security problems has not been sufficiently analyzed, nor have investigations centered on how the public engages with such media framing.

The state responses have varied considerably in response to the challenges of the return of foreign fighters and their family members, including women and children (Hoffman & Furlan, 2020). While the United Nations has urged states to repatriate their citizens from Iraq and Syria, relatively few countries undertook comprehensive repatriation efforts. Although the number of people who travelled to Iraq and Syria from Central Asia and Western Europe was broadly comparable, Central Asian governments organized substantially more returns (Farrell et al., 2021). The National Defense Committee of the Republic of Kazakhstan (KNB) reports that as part of Operation *Zhusan* and other Kazakhstan return operations, 735 people have been recovered (Akylzhanova, 2025). In contrast, Western European governments tended to be less willing to return foreign fighters, particularly adults, mainly due to security concerns and domestic political opposition. As noted by Hassan (2021), France initially limited returns to children on a case-by-case basis, with a total of 35 children returned, following the return of 10 orphans in June 2020. The priority of many Western countries was to avoid increasing terrorist threats and national tensions due to insufficient preparation for repatriation and limited capacity to manage returning combatants (Khan & Parsons, 2021).

Kazakh authorities were concerned that citizens who had travelled to Iraq and Syria might return and engage in extremist activities or terrorist acts, particularly given the use of Kazakh citizens in ISIS propaganda (Farrell et al., 2021). In both countries, numerous problems arose during the repatriation process, including serious security concerns, but differing strategies were carried out in each country. There has been an increasing body of scholarship that has studied the effects of media framing on the public understanding of terrorism and security (Tulga, 2020; Kyriakou, 2017). The media not only report on the process of repatriation, but also position the returnees in moral terms. Security framing focuses on concepts of danger, risk, and threat in the context of repatriation, while humanitarian framing focuses on vulnerability, rehabilitation, and reintegration, especially in the context of women and children (Snowden, 2019; Stenger, 2023).

The main research question is: *How do Kazakhstani and French media frame the repatriation of citizens from conflict zones, and how do public reactions to these frames reveal differences in national narratives of security, morality, and compassion?*

Stenger (2023) notes that foreign combatants supported by states pursuing repatriation are seen as victims, whereas those not supported by their states are seen as radicalized villains. However, few comparative studies have examined how repatriation debates are framed and how these debates are responded to by the public, particularly between Central Asia and Western Europe. This study therefore investigates the differences between Kazakhstani and French approaches to framing the concept of repatriation and the perceptions of the public about Operation *Zhusan* and the repatriation of families involved in ISIS.

The study is grounded in strategic culture and media framing theory. These theories are essential for understanding the dynamics of repatriation debates and describing how historically acquired national meanings are constructed and contested in media discourse and public reactions.

The study contributes to the literature on media framing, strategic culture, and terrorism. It extends the definition of strategic culture to incorporate, in addition to the voices of elites and official documents, public or public media reactions to a set of prescribed events. It also highlights the way the media narratives around repatriation contribute to a wider securitization and responsibility discourse. Using framing theory, the study analyses the link between the moral positioning of returnees as threats or victims and the perceived legitimacy of different policy choices. In this, it stresses the role of morality, an often-forgotten element of framing security. The study presents a comparative analysis of Kazakhstan and France, articulating the differences in the media discourse and the reactions of the public to the repatriation process. It allows for dialogue between the post-Soviet space and the Global North as a way to move beyond regional analysis in the field of comparative studies in security and the media.

2. THEORETICAL FRAMEWORK

Repatriation from conflict areas is not only a legal or humanitarian mechanism, but a contested political and discursive process. Governments' strategies around return, risk evaluations of returnees, and the rationale for policies adopted are shaped by broader conceptions of security, citizenship, and national responsibility. Rather than just government policy, political discourse and media portrayal also influence public understandings of repatriation. In order to further describe these interrelated processes, the study integrates strategic culture, securitization theory, and media systems theory as analytical approaches, and framing theory in studies of how repatriation is framed in news texts. These perspectives are engaged at various analytical levels: strategic culture is applied to the general context of historically-specific understandings of security and responsibility, securitization theory adds context to the ways in which security concerns are articulated in discourse, media systems theory contributes to the context of the differences in institutional and ownership environments, while the media texts are analyzed primarily using framing theory.

Strategic culture is the macro-level basis of the framework, as it helps to elucidate how states create enduring understandings of threats, identities, and legitimate responses to them. Based on Gray's conceptualization (1999), strategic culture is the sum of ideas, traditions, values, and mental habits embedded in history that shape the views of political communities on security problems. It does not set policy in the sense of dictating what is to be done, but sets the conceptual framework where threats are noted and responses deemed appropriate. Within the framework of repatriation, these decisions are part of broader political assumptions of citizenship and the state concerning concepts of sovereignty, state responsibility, and permissible strategies of risk management. In some countries, humanitarian reintegration may be emphasized, in others, public security and counterterrorism may be the starting point. Such disparities may also reflect underlying historical forces that shape concepts and practices of security.

However, strategic culture is not enough to account for the emergence of public concrete security discourses. In this respect, the study is based on the securitization theory, widely used among the Copenhagen School, in particular on works by Buzan, Wæver and de Wilde (1998). According to securitization theory, threats are not just objective events, but they are "securitized" when powerful actors represent a problem as an existential threat to which unusual methods of response are called for. From this perspective, we see how security understandings are cultural and then manifested in

narratives of the public, which are important for comprehending repatriation. During this process, reintegration will be presented as a humanizing duty toward citizens, or as a threat perceived in the form of surveillance, limitation, or exclusion. Hence, strategic culture may shape which understandings of the issue are perceived as plausible and legitimate, whereas securitization accounts for the manner in which these interpretations surface in the language and how they become authoritative political stories.

The institutional environment also contributes to the circulation of these kinds of stories in the media. This study follows a comparison of media systems approach by Hallin and Mancini (2004) to acknowledge the variances in how security issues are communicated across different countries. The framework indicates that there is a variance in media systems based on their relations with political power, journalistic autonomy, and their institutional and cultural contexts in general. Such differences may shape the extent to which official narratives are reproduced; the space for contestation; and the public's framing of security-related issues. This may be particularly true when Kazakhstan and France are contrasted, as they possess different media system structures, and state and press relations differ markedly. Based on media systems theory, one can then understand the phenomenon of similar securitized stories being activated, diminished or challenged within distinct national contexts. In these institutional environments, framing theory enables the analysis of the translation of these narratives into specific text representations.

At the level of textual analysis, framing theory serves as the tool for identifying how repatriation is represented in media coverage. Building on Entman (1993), a frame is defined as a selection and salience of aspects of reality in the process of defining a problem, assigning causality, evaluating actors, and proposing solutions. The framing theory is the basic empirical tool for this research, whereas the strategic culture, securitization theory, and media systems theory serve to link the frames found in the mass media texts and to give meaning to the resulting frames. The framing analysis enables the evaluation of the representation of returnees as vulnerable citizens, subjects of humanitarian interventions, as potential actors in the security apparatus, or even as suspects or threats, as well as its justification and legitimation in media discourses. These perspectives stand together as a basis to analyze the content of media in the context of shifting perceptions of security, responsibility, and political belonging. The empirical analysis stresses the patterns of framing, while the strategic culture, securitization theory, and media systems theory offer the context and interpretative tools to understand contrasts between Kazakhstan and France.

3. LITERATURE REVIEW

Building on existing scholarship, there tends to be a strong connection between media framing and public perceptions of women involved in political violence. Gentry and Sjöberg (2007) found the major gendered frames in this case to be the mother frame, the monster frame, and the whore frame, with later research adding the victimization frame. Comparative research also reveals that the emphasis on similar frames is different across national contexts. For instance, there is a greater focus in Dutch media on matters of law and security, while Belgian media focus more on morality and humanitarian responsibility (Bossen & Badran, 2025). These dynamics play out also in Kazakhstan, Turkey, the United Kingdom, and

Indonesia, where media discourse either labels returnees as a threat to security or a victim in need of rehabilitation (Bekitova, 2025; Arslan, 2024; Snowden, 2019; Rahayu, 2025). However, current research is limited to looking at media frames within a single-country setting and mainly concentrating on the identification of the media frames and not looking at how audiences interpret and challenge them.

Beyond constructing representations of returnees, media framing also influences public opinion and policy debates surrounding repatriation. There is existing research that confirms that media narratives have an impact on the perceptions of returnees by the citizens, but also on government justifications for its actions in regard to them. In that regard, Lee (2021) suggested that only a partial correlation exists between newspaper coverage and the “CNN effect” in the context of the Rohingya genocide, which demonstrates that the media's influence on politics is dynamic and not determinative. Similarly, Zharkynbekova et al. (2024) demonstrate that in Kazakhstan, policy changes influenced media discourse more than media framing shaped policy outcomes. The replacement of the term “oralman” with “qandas” contributed to increasingly positive media portrayals and greater public acceptance of returnees. Farrell et al. (2021) reveal that Operation Zhusan was presented as a humanitarian and security mission, making it easier for the government to frame the repatriation as a legitimate move while pushing the idea of rehabilitation in line with counterterrorism operations. The authors report, however, that the general social stigma remains a challenge to successful reintegration. Overall, the literature offers only partial comparative evidence for the impact of media narratives, public opinion, and policy on each other in different national contexts.

However, media narratives do not operate independently from broader political and strategic contexts. Conventional scholarship regarding state actions shows that return is not decided solely on security grounds, but also on domestic political, institutional, and “socially constructed understandings of responsibility”. According to Stenger (2023), states that promote repatriation often purposefully design returnees in terms of victimisation; restrictive states, on the other hand, tend to create returnees based on representations of threat. Similarly, Ingram et al. (2022) demonstrate that national security discourse is frequently employed to justify limitations on repatriation, while domestic political pressures and public opposition influence governmental choices. In the European context, Dworkin (2019) shows that Western governments, including France, have often avoided repatriating ISIS-affiliated citizens due to concerns about security risks and political backlash. By contrast, Central Asian countries like Kazakhstan have taken more proactive steps, taking responsibility for citizens in conflict zones. While there are studies that account for the drivers of state decisions, little research has focused on how these decisions are created and accepted as such in media discourses.

In sum, the existing scholarship available offers valuable insights into media framing, public perceptions, and state strategies for repatriation. Several gaps, however, do exist. Most studies are conducted on a national or regional basis, and comparative insight into differences in how these political and cultural contexts inform repatriation discussions is limited. Moreover, the focus of research has been on the content of the media and not on how audiences receive and challenge these narratives. Filling these gaps, this study examines a comparison between Kazakhstan and France on how perception of security, understanding of moral responsibility, and public reactions manifest in different frames of media coverage.

4. RESEARCH METHODS

This study adopts two complementary research methods – framing analysis and thematic analysis – within a comparative qualitative research design to examine media framing and public reactions to the repatriation of citizens from ISIS-controlled conflict zones in Kazakhstan and France. The study adopts strategic culture as a discursive phenomenon, which is reflected in the media representation and public responses, and thus disassociates it as an independently measurable variable. As such, strategic culture, securitization, and media systems are employed for the purpose of contextualizing and interpreting the frames observed but not used as independently measured variables.

The timeframe of the study spans from 2019 to 2025, featuring illustrative but mirroring media debates on the repatriation of citizens in Kazakhstan and France, especially women and children. In Kazakhstan, the 2019–2022 period witnessed sustained media coverage of the state-led Operation Zhusan and calls for a coordinated and comprehensive approach to repatriation. This period involved the first individual cases of return of children in France and significant and successive collective repatriation operations from 2022 onwards. Extending the timeframe to 2025 allows for an examination of how these different approaches developed over time and how media discourse evolved in both countries. The selection of 50 Kazakhstani and 50 French media texts ($n = 100$) was performed with the aim of framing analysis. Purposive keyword sampling was used to retrieve 34 online news articles and 16 social media posts from Kazakhstan, and 33 online news articles and 17 social media posts from France. Research was carried out in Russian, Kazakh, English, and French via Google and mainstream search engines, not dedicated academic databases. The following keywords were used to ensure relevant media articles are obtained: “ISIS”, “Islamic State”, “Zhusan”, “repatriation”, “returnees”, “foreign fighters”, “Syria”, “Iraq”, “rehabilitation”, “deradicalization”, “terrorism”, “national security”, “humanitarian”, “women and children”, “camps”, “Al-Hol”, “Kazakhstan repatriation”, “France repatriation”, “jihad”, and “radicalization”. Media sources were classified as state-owned, state-affiliated, and independent (see Table 1) to investigate institutional affiliation and its effects on media framing. Media sources were divided depending on the extent of editorial autonomy, the source of funding, institutional and political affiliations, and the nature of ownership. Media that are directly owned or controlled by the state are described as state-owned media. State-affiliated media is defined as private or formally independent media organizations that have strong political or economic ties to state institutions and/or political elites, through funding, ownership, or using state advertising. Independent media are those that are not directly owned by the state or under its formal control, but substantive independence is not necessarily guaranteed because of economic, political, or professional circumstances. The analysis of state-affiliated French media is presented with caution as the sample of these media is relatively limited ($n = 4$), and is only meant to offer patterns that appear within the examined texts, and not to draw general conclusions about all state-affiliated French media at large.

Table 1. Distribution of Media Sources by Type and Institutional Affiliation

Country	Media type	State-owned	State-affiliated	Independent	Total
Kazakhstan	Online news articles	14	15	5	50
	Social media posts	8	4	4	
France	Online news articles	8	2	23	50
	Social media posts	4	2	11	

Source: Author's own elaboration based on the data.

The framing analysis employed a predominantly deductive method rooted in the general theoretical perspective and used the three analytical frames of security, morality, and compassion as an operationalization. Media texts were examined and coded according to these frames. The study approached the notion of framing as a patterned interpretation and meaning-giving schema that connects diagnosis, evaluation, and recommended response. Each text was reviewed for the presence of one or more frames, while the frame that most prominently structured the overall portrayal of repatriation was coded as the primary frame. Where multiple frames were present, the primary frame was determined based on the dominant emphasis of the text, including the framing of the main problem, evaluation, and proposed or implied response. The operationalization of the framing categories is presented in Table 2.

Table 2. Operationalization of framing categories

Frame	Analytical function	Coding indicators
Security	Repatriation as a threat-management and governance problem.	Prosecution, monitoring, legal accountability, counterterrorism, language of containment, international cooperation, emphasis on public safety and state stability, preventive control,
Morality	Repatriation as a question of responsibility and ethical judgement.	Guilt, responsibility, critique, evaluative tone, emphasis on accountability, moral breach.
Compassion	Repatriation as a humanitarian and rehabilitative issue.	Vulnerability, victimhood, distress, injury, sympathetic tone, recovery, reunification.

Source: author's own elaboration based on the data

To ensure consistency in the application of the coding scheme, the codebook was pilot-tested before the full coding process. Two coders then independently coded the material, after which their coding decisions were compared. Differences where they occurred were discussed and resolved using the operational definitions outlined in the codebook. Furthermore, with the objective of capturing audience reactions, 500 comments from

each country were purposely sampled from one YouTube video per country, resulting in a total of 1,000 comments. The analysis was conducted in April 2026, and one video per country was selected based on its level of engagement, considering the number of views, likes, and comments. From the one selected video for each country, the most popular comments, primarily identified by the number of likes, were selected for analysis. Comments were reviewed individually to identify and remove duplicate entries. Comments that were not substantively engaged, such as emoji-only responses, very brief comments like “oh,” and any comments that were not a position or meaning related to the topic were coded as not applicable. This was an interpretative thematic analysis because the coding required researcher judgment in interpreting how each comment’s meaning and stance aligned with the conceptual frames. All comments have been assigned to one of eight mutually exclusive themes with one thematic code per comment. The eight themes were:

1. *Security threat* – remarks portraying returnees as a threat to society featuring violence and radicalization.
2. *Victimization* – remarks including portrayal of people (particularly children and occasionally females as wives due to actions of their husbands) who had no say in the situation, highlighting their vulnerability and suffering.
3. *Moral responsibility* – statements that attribute moral accountability to people with emphasis on personal responsibility and judgement.
4. *Compassion* – comments indicating empathy, forgiveness, or support to rehabilitate and assist returnees.
5. *Punishment/no return* – remarks advocating exclusion, imprisonment, only selective repatriation of children, or denial of repatriation in the first place as the proper treatment for returnees.
6. *Blame the state* – critical comments of governmental policies, including disapproval of existing ones and structural failures.
7. *Support the state* – remarks made in support or defense of governmental policies, decisions, and actions concerning repatriation.
8. *Not applicable* – off-topic statements, consisting of exclusive usage of emojis, humor, or unrelated reactions irrelevant or not aligned with the topic.

The same coding procedure was applied to the French-language YouTube comments, with particular attention to the linguistic and contextual meaning of comments. Despite the strengths of the methodological approach, several limitations should be acknowledged. Firstly, although French comments were interpreted in their original language, the analysis was conducted by a non-native speaker, which may have affected the interpretation of culturally specific humor, sarcasm, or idiomatic expressions. Secondly, the study fails to address how the media framing changed in the period from 2019 to 2025, thus restricting the analysis of change in discourse over time. Lastly, the results of online comments should not be taken as an indicator of national public opinion; they are the opinions of people who actively selected to attend the online discussion, but not those of the entire nation. The YouTube comments analyzed in this study were publicly available and were used solely for research purposes. Usernames, profile information, and other potentially identifying information were not reported or mentioned in the article. This study does not aim to identify or assess specific users, but rather the patterns of public discourse.

5. RESULTS

This section presents the findings of the media framing and public discourse analysis on repatriation in Kazakhstan and France. It begins by presenting the distribution of morality, security, and compassion frames by media ownership type in each country. It then compares thematic patterns in user comments under selected YouTube videos related to repatriation. Together, these results illustrate both institutional (media) and grassroots (public) dimensions of the debate.

5.1. Media framing in Kazakhstan

Table 3. Media Framing of Repatriation in Kazakhstan: Allocation by the Media type

Country	n	%	Media frames		
			Morality	Security	Compassion
Kazakhstan	50	total	2	46	52
% of media frames by media type	22	state-owned	0	63.6	36.4
	19	state-affiliated	5.3	26.3	68.4
	9	independent	0	44.4	55.6

Source: Authors' own elaboration based on the data

Table 3 shows the distribution of media frames in 50 Kazakhstani media texts depending on the type of media ownership. Overall, compassion was the most prevalent frame (52%), followed by security (46%) and morality (2%).

Security framing manifested itself more strongly in state-owned media, where its portion in all identified frames was 63.6%. The outlets mostly discussed repatriation from national security, counter-terrorism, monitoring, and state control angles. In contrast, compassion framing accounted for 36.4% of the coverage, while morality framing was absent.

The frame distribution of state-affiliated media differed. Compassion represented the largest percentage, 68.4%, while security accounted for 26.3%, and morality just 5.3%. Compared with state-owned outlets, these media placed greater emphasis on humanitarian aspects of repatriation, particularly the experiences of women and children.

Subsequently, high rates of compassion framing (55.6%) and security (44.4%) were also observed in independent media. Similar to state-owned outlets, morality framing was not identified in the independent sample.

Overall, the findings indicate that security and compassion dominated media coverage of repatriation in Kazakhstan, although their relative emphasis differed across ownership categories. State-affiliated and independent media paid more attention to the humanitarian side, while state-owned media was more focused on security aspects of the conflict. Throughout all the media types, the position of morality was the lowest occupied frame.

5.2. Media framing in France

Table 4. Media Framing of Repatriation in France: Allocation by the Media type

Country	n	%	Media frames		
			Morality	Security	Compassion
France	50	total	14	50	36
% of media frames by media type	12	state-owned	16.67	50	33.3
	4	state-affiliated	0	25	75
	34	independent	14.7	52.9	32.4

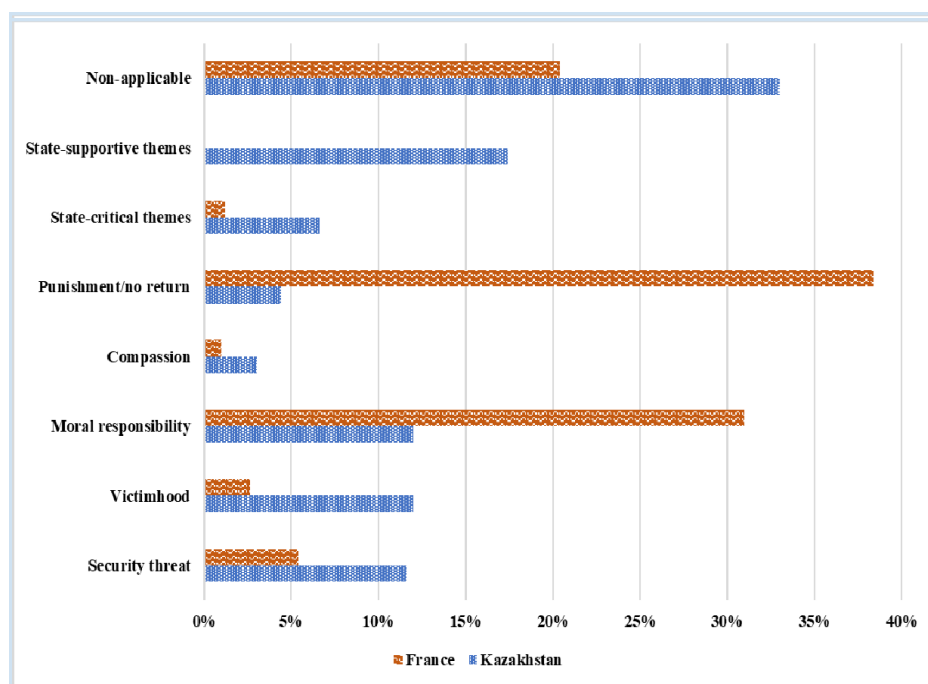
Source: author's own elaboration based on the data

Table 4 presents the distribution of media frames across French media sources. Similar to Kazakhstan, the security frame was the most prevalent, accounting for 50% of all identified frames. Security issues were widespread in both independent (52.9%) and state (50%) media, with discussions on repatriation being concentrated on counterterrorism, public safety, legal responsibility, and the security of the state. French coverage was, however, quite different, and more attention was also paid to depicting morality (14%) and compassion (36%), with an overall more diverse framing of the issue.

Compassion framing was especially common in the media under state influence, making up 75% of all frames identified, whereas security represented just 25% of the media framing. These outlets frequently emphasized the humanitarian conditions of women and children, psychological trauma, family separation, and the vulnerability of minors. Independent media, by contrast, more fully tackled ethical issues of state responsibility and the rights of returnees while concurrently reporting on security matters.

Another notable finding is the greater presence of morality framing in France compared with Kazakhstan. Morality was not a dominant frame overall, but it showed up in 14.7% of independent media and 16.7% of state-owned media, with no appearance in state-affiliated media. The repatriation was presented in the media as a security issue, but it also sparked a debate about justice, responsibilities, citizenship, and the social and state duties of the French. Ethical questions surrounding whether France should repatriate its citizens and how returnees should be treated appeared more frequently than in the Kazakhstani case.

Overall, the results indicated that though security was the most prevalent interpretation category, there was a higher degree of diversity in the discourses of French media regarding repatriation than is found for Kazakhstan. The coexistence of frames for security, compassion, and morality suggests a more intersectional, or competing, framing of the media debate, in which humanitarian issues and ethical considerations usually walked alongside concerns about terrorism and national security.

Figure 1. Comparison of public discourse themes: Kazakhstan vs. France

Source: author's own elaboration based on the data

Figure 1 compares the distribution of thematic patterns identified in public comments on repatriation in Kazakhstan and France. The results indicate notable variations in the perceptions of people returning from conflict areas in both countries.

The distribution of themes in the comments under the examined YouTube videos in Kazakhstan is relatively balanced, with several themes represented. The greatest amount is in state-supportive comments (17.4%), indicating a relatively prominent level of approval for the government's repatriation policy within the sample. With close to equal frequency, themes on victim (12%), moral responsibility (12%), and security threat (11.6%) are present, which indicates a simultaneous consideration of national security and the acknowledgment of humanitarian problems. Only 4.4% of the discourse is punishment/no return, whereas state-critical comments make up 6.6% of the discourse. The compassion theme is relatively scarce (3%), while the non-applicable type is rather prevalent (33%), corresponding to humor and non-applicable or uncategorized responses.

The picture is very different in France. Public discourse is dominated by punishment/no return (38.4%) and moral responsibility (31%), together accounting for more than two-thirds of all coded comments. Compared with these, the presence of security threat in comments is still in small numbers, at 5.4%, as are victimhood (2.6%), compassion (1%), and state-critical comments (1.2%). The French sample lacks comments that highlight state support. About 20% of the data is non-applicable comments.

In general, the results indicate marked differences in the themes expressed in the public comments in the two countries. Public debates in Kazakhstan are spread over various topics and are focused on humanitarian issues, security problems, and the role of the state, however, public discussions in France narrow down mainly to punishment and personal responsibility. It is clear from these patterns that, in the two national experiences, public narratives about the issue of repatriation were quite distinct.

6. DISCUSSION

The comparison reveals a fundamental divergence in how security and compassion are configured in national media narratives. While discussion of repatriation in both countries occurs through the lens of security, compassion, and morality, the weight given to these lenses and the understanding of what is meant in each discussion, differs. Compassion was slightly more dominant in the Kazakhstani media sample, while security was the strongest media frame in France. In Kazakhstan, this predominance of compassion was expressed through a consistent portrayal of returnees, particularly women and children as vulnerable victims in need of protection, rehabilitation and family reunification. Humanitarian concerns were foregrounded in narratives about suffering in conflict zones, psychological trauma and the moral duty of the state to care for its citizens. Meanwhile, the issue of security framing was not lacking, but it was simultaneously discussed alongside ideas of responsibility of the State and controlled reintegration, not simply as a punitive and exclusionary culture. In France, however, a moral judgement, an emphasis on individual responsibility, and exclusionary responses were combined with security framing. The purpose of these divergent configurations is to demonstrate how the security issue can be incorporated into various national narratives of responsibility, citizenship and belonging, hence, it must be understood beyond a narrow security lens.

The Kazakhstani results demonstrate that media ownership is associated with important differences in the relative prominence and articulation of security and compassion frames. The high percentage of security framing within state-owned media can be interpreted in the context of the state of the media landscape in Kazakhstan, which faces profound dependence on government-related funding, reduced editorial autonomy, and concentrated media ownership by elites linked to the government (Dragomir & Soderstrom, 2022; Dumont et al., 2023). In this context, repatriation can occur in a national security, counterterrorism, monitoring, and state-control manner. By defining these returnees as in need of regulation, the security frame also sets the tone for state intervention as the proper solution. Drawing on this, Operation *Zhusan* is especially important because the state might demonstrate its ability to safeguard citizens and manage security threats at once.

Meanwhile, Kazakhstan's media landscape is not predominantly security-oriented. Compassion was the most prevalent frame overall and was dominant in both state-affiliated and independent media, while security was particularly prominent in state-owned outlets. This separation implies that state-affiliated media outlets can possibly serve other communication functions in the media environment, characterized by institutional alignment and a stronger emphasis on humanitarian stories. Voltmer (2013) emphasizes that media operating between political institutions and audiences may perform such a mediating function. In this instance, the focus on women, children, suffering, and vulnerability brings a humanitarian dimension to the security

narrative. Compassion does not necessarily present a security-oriented interpretation, but can frame action taken by the state as protective and legitimate. Security sets the framework for intervention, compassion shows it is an act of care and responsibility. This corresponds with Bekitova's (2025) finding that Kazakhstani media can portray women and children associated with ISIS simultaneously as vulnerable victims and potential security concerns.

The near absence of morality framing in Kazakhstan is also notable. The central media question seems not to be moral right or wrong, but how the state should address a humanitarian and security issue. The absence of direct moral contestation is in line with the context in which media is limited in scope, with state influence that can constrain the interpretation of competing perspectives. Hallin and Mancini (2004) link greater state influence to less pluralism in the media, whereas Rakhmetov (2026) discusses the synchronization of narratives surrounding the legitimacy of the state in Kazakhstan. Therefore, the absence of a morality frame should not be interpreted as the lack of moral judgment, but as insufficient opportunities for morality to emerge as an explicit part of the media debate.

This setup is further illustrated in the public discourse. Kazakhstani comments are split between state support, victimhood, moral responsibility, security threat, and punishment/no return, the biggest substantive group being state-supportive, and punishment being relatively bounded. This aligns with the official description of Operation Zhusan as combining humanitarian and security goals. Return and protection of women and children, monitoring, prosecution, psychological support, and reintegration were highlighted in government explanations (Government of the Republic of Kazakhstan, 2021). Security takes a more preventive meaning than only punitive, in that risks are recognized, though intervention and rehabilitation are offered as options for managing rather than for excluding returnees for good.

Such a state-focused repossessionist reading is also a part of Kazakhstan's overall repossessionist and nationalization journey. Zeveleva (2014) associates return with post-Soviet national identity, while the state-assisted return of ethnic Kazakhs (historically, known as oralman; more recently, qandas) offers another context in which repatriation can be associated with collective identity and state responsibility. The repatriation of citizens from the conflict zone does not necessarily refer to the return of ethnic Kazakhs, but it provides a background to the role of state-led return in relation to national belonging. As a result, adults can be viewed as security and moral issues but also as part of the national community and open to regulation, rehabilitation, and monitoring. Bekitova (2025) similarly identifies a protective and paternalistic representation of female returnees in Kazakhstani media.

The French findings reveal a different security framing–moral contestation linkage. The overall frame of the media is security, which shows that higher pluralism does not mean more non-security representations of ISIS returnees. Ruiz Perez (2023) highlights the securitization of ISIS discourse in Europe as pertinent to the resistance against repatriation. It is precisely the fact that security emerges alongside morality and compassion that differentiates France. Morality is more apparent, especially in independent media, and debates arise regarding responsibilities, citizenship, equity, and the state's obligation to return its citizens. Similarly, Matthes et al. (2025) find that humanization and moral evaluation are context-dependent across media.

The most noteworthy distinction is when media framing is contrasted with the public discourse. Punishment/no return and moral responsibility are the predominant themes

of public comments in France, while there are few explicit references to security threats. This indicates that the audiences are not simply repetitive in reproducing the dominant media frame. Rather, security can be seen as moving into a vocabulary of morality, one that emphasizes individual agency and culpability. Arguments that returnees “chose” their actions shift attention from the abstract question of security toward what individuals deserve because of their perceived choices. The low levels of victimhood and compassion reinforce this interpretation. This may therefore be considered a public discourse that is shifting a security question into a question of deservingness.

This punitive interpretation also fits with the political history and ideas of France regarding its national identity. The aftermath of the Algerian War, with the histories of the *Pieds-noirs* and *harkis*, offers a backdrop to a changing understanding of repatriation, loyalty, citizenship and belonging (Eldridgen et al., 2023). This is not meant as a direct point to contemporary comments, but it serves to show why repatriation is not always simply an administrative matter, and can be expressed in terms of loyalty and responsibility. The republican conception of citizenship and the politicization of terrorism and Muslim identity further complicate the humanization of ISIS-affiliated women. Stenger (2023) illustrates how gendered and racialized notions of threat can create redeemable or dangerous images of returnees.

The comparison thus would highlight a significant shift toward media framing as compared to the public interpretation. In Kazakhstan, compassion and security find their way into public discourse by means of themes of state support, victimhood, preventive security, and limited punishment. Security, compassion, and morality in French media are described by increased focus on punishment and individual responsibility. The public then simply does not react to the same general security issue, but they react to different conceptions of who is responsible. In Kazakhstan, the state is more clearly deemed to be responsible as the actor to protect, regulate, rehabilitate, and reintegrate its citizens. In France, it is more strongly attributed to individual returnees for the choices they are perceived to have made.

The results suggest two different configurations of security discourse. A protective-reintegrative logic is evident in Kazakhstan, where potentially dangerous returnees may not be excluded from the national community but instead continue to be managed and rehabilitated by the state. In France, there is a more punitive-exclusionary conception of security, where individual choice and moral responsibility also influence judgements regarding who is deserving of reintegration. In this way, the same security concern is given various targets of responsibility: the state is largely responsible for management and reintegration of citizens in the Kazakhstani discourse, while individual returnees are clearly more at fault for their perceived actions in the French discourse.

7. CONCLUSION

This study examined how media in Kazakhstan and France framed the repatriation of citizens from conflict zones and how these frames corresponded with public discourse. While security was the predominant media frame in France, compassion was slightly more prevalent than security in Kazakhstan, although security remained a substantial component of the Kazakhstani media discourse. Notions of security are understood in accordance with local understandings of citizenship, responsibility and belonging,

yielding a varied engagement with the same policy question in the media and public sphere.

The comparison indicates that there is a broader political and strategic-cultural context for the framing of media. In Kazakhstan, repatriation was essentially integrated with a state-centered discourse that interwove together security and humanitarian responsibility with national solidarity, thereby lending legitimacy to reintegration. In France, security was not only accompanied by greater moral contestation, but by greater questions of guilt, accountability and of national loyalty which took a much firmer place. These differences indicate that the media reflects not solely the present-day security needs but the prototypical political culture that is historically constructed and which may shape how groups are understood as “deserving” and “legitimate” members of the political community.

By bringing together framing theory and strategic culture, this study contributes to the literature in two ways. Firstly, it shows that it is possible for identical security problems to give rise to manifold different media narratives, contextually dependent. Second, it goes beyond the existing research on the repatriation process by relating media framing to the public sphere, demonstrating that the responses of the public often reproduce the interpretative parameters within the popular media discourse, while also revealing more fundamental notions of citizenship and state responsibility.

There are also practical implications of the findings. Security arguments alone are not likely to make repatriation policies legitimate in the public arena. Setting up a link between security, humanitarian responsibility and national identity depends on how governments and media exchange it with their public. It is therefore essential that policymakers consider these framing dynamics if they intend to enact reintegration policy in politically contentious settings. Finally, the study suggests that repatriation should be considered not only as a counterterrorism policy, but also as an expression of societies' views on citizenship, responsibility and belonging in times of insecurity.

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CONFLICTS OF INTEREST

The authors declare that there are no conflicts of interest.

AUTHORS' CONTRIBUTIONS

AT: development of the research concept and original idea, formulation of the theoretical framework, review and analysis of the scientific literature, organization and implementation of the empirical study, data collection and processing, and participation in drafting the manuscript; AZ: contribution to the refinement of the research concept, data collection and processing, analysis and interpretation of the results, joint drafting of the manuscript with AT, preparation of the final version of the manuscript, formatting and submission-related tasks; IS: contribution to the theoretical framework, refinement of the research concept, interpretation of the results, scientific editing of the manuscript, supervision, and final approval of the manuscript.

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EXTENDING OMNIDIRECTIONAL HEDGING THROUGH THE SOCIAL DIMENSION OF SHELTER THEORY: SMALL-STATE STRATEGY IN KAZAKHSTAN AND UZBEKISTAN

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ABSTRACT. *This article examines the theoretical complementarity between shelter theory and omnidirectional hedging in the foreign policy of small and medium-sized states. Both approaches offer alternatives to traditional concepts such as balancing, bandwagoning, and neutrality, which often fail to explain the multidimensional strategies adopted by states operating in asymmetric geopolitical environments. The article argues that shelter theory and omnidirectional hedging can be integrated into a broader analytical framework by extending omnidirectional hedging to incorporate a social dimension drawn from shelter theory. The proposed framework is particularly relevant for Central Asia, where states navigate corresponding pressures from Russia, China, Western actors, and regional institutions. Through qualitative conceptual analysis and illustrative discussion of Kazakhstan and Uzbekistan, the article demonstrates that hedging is not only a strategy of diplomatic, economic, and security diversification, but also a socially embedded process shaped by domestic legitimacy, societal openness, education, mobility, and public support. Kazakhstan's multi-vector foreign policy and Uzbekistan's strategy of openness illustrate how social stability and societal development reinforce external diversification and strategic autonomy. By incorporating the social dimension into omnidirectional hedging, the article contributes to small-state foreign policy theory, hedging studies, and Eurasian studies.*

KEYWORDS: *foreign policy, small states, international relations, Central Asia, Kazakhstan, Uzbekistan.*

1. INTRODUCTION

Foreign policy, as a term, can be defined in various ways, depending on different levels – such as the individual, group, state, or group of states. However, most agree that it concerns the behavior of states toward other states and the entirety of their relations (As, 2018). When discussing the theoretical analysis of foreign policy, attention is given to how states respond to threats posed by opponents or threats arising from regional or systemic power shifts, what opportunities states have, and what difficulties they face in resisting them (Savic & Shirkey, 2017). Considering the threats to state security, the specific status of a country in the international system and potential aggressors, states adopt one or another foreign policy strategy. At the same time, their choice is influenced not only by external factors, such as the regional structure of states (who their neighbors are), the form of the international system (bipolar,

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multipolar), international norms, and culture, but also by internal aspects, such as the country's political system, including institutional stability, economic and geographical environment, public support, historical reputation (Dreyer & Jesse, 2016), the size of state, strength and capabilities (Telci & Rakipoglu, 2021). Importantly, in the context of the emerging Central Asian regional order, characterized by intensifying regional dynamics, institutional multiplicity, and the growing influence of China, these external and internal factors interact in more complex ways, particularly for small and medium-sized states seeking to preserve autonomy under conditions of great power competition.

These questions primarily shaped the foreign policies of states from their foundation (Savic & Shirkey, 2017) until the end of the Cold War and the dissolution of the Soviet Union. This event led to the idea that liberal democracy, as a form of governance, had triumphed over all other philosophies, such as fascism and communism, and that the global economy was creating a homogeneous world culture, rendering states unnecessary (Drezner, 1998). As a result, the number of academic works examining how states, as subjects of international relations, respond to potential threats stagnated, because present realist and liberal explanations have not been properly integrated with newer rationalist insights and many contemporary works pay attention primarily to great powers and exclude small states¹ (Savic & Shirkey, 2017). At the same time, it is well established that the foreign policy strategies of secondary or small states, with a limited potential to change or at least influence the international order or protect their national interests using their own political or military means (Telci & Rakipoglu, 2021), are analyzed less frequently than those of major world powers and their foreign policies are generally seen as balancing, bandwagoning, neutrality or hedging (Veenendaal, 2024). Small states are usually defined as the weaker party in an asymmetric relationship, and they must prioritize among the costs of entrapment and abandonment. Until recently, the international relations (IR) literature has paid little theoretical attention to the actual diplomatic strategies for balancing different types of costs and navigating the dilemma of being between a rock and a hard place (Pedersen, 2023). Two comparatively recent theories emerge here – shelter and omnidirectional hedging (the latter may be seen as a branch of hedging strategy) – which describe how small states can navigate, balance, and reduce the costs of the dilemma of entrapment and abandonment. These theories appeared because certain empirical realities, such as Southeast Asia (in the case of omnidirectional hedging) or Iceland and other Scandinavian countries (in the case of shelter theory), did not fit neatly into previously established strategies. It is also agreed that both strategies are still theoretically underdeveloped and need to be applied and tested empirically e.g. shelter theory was used mainly for explanation of Scandinavian or Baltic States foreign policy (Wivel & Ingebritsen, 2019), while omnidirectional hedging was mainly used for explanation of Southeast Asia's (including Japan) (Suorsa, 2017) or Central Asia's (Sim & Aminjonov, 2022) foreign policy. In this regard, Central Asia provides a particularly relevant context for reassessing and refining foreign policy strategies applicable to small and medium-sized states. Located at the intersection of Russian, Chinese, Western, and regional interests, Central Asian states must navigate overlapping pressures while preserving autonomy, domestic stability, and strategic flexibility.

In this case, this article argues that shelter and omnidirectional hedging foreign policy strategies can be combined into a new theoretical model by presenting and comparing them with the purpose to expand omnidirectional hedging strategy analytical scope

¹ In this article, small states are understood not exclusively in demographic or territorial terms, but primarily as states with limited capacity to independently shape the regional or international order.

and making it more comprehensive by adding a social dimension based on shelter theory attributes. This would contribute to foreign policy analysis by placing both strategies in a whole spectrum of institutionalized foreign policy strategies – balancing, neutrality, or bandwagoning, and providing international relations specialists with a deeper understanding of shelter and omnidirectional hedging concepts and their main attributes.

At the same time, the article further contributes to the development of shelter and omnidirectional hedging strategies in IR literature on small-state diplomacy, showing how small states could apply these strategies by forming and developing their foreign policies. The analysis is limited to the perspective of small states themselves and does not examine how larger states respond to these strategies.

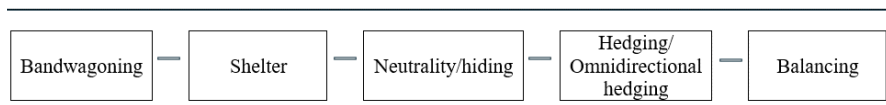
This article makes three key contributions to the literature on small-state foreign policy, hedging theory, and Eurasian studies. First, it extends the concept of omnidirectional hedging by incorporating a social dimension, addressing a key theoretical gap in existing frameworks. Second, it bridges shelter theory and hedging approaches into a unified analytical model applicable to small and medium-sized states operating in asymmetric geopolitical environments. Third, it provides a policy-relevant framework that improves understanding of how Central Asian states navigate great power competition while maintaining domestic stability, societal resilience, and strategic autonomy.

2. METHODOLOGY

The article applies qualitative conceptual analysis and structured comparison of the two theoretical frameworks - for small and medium-sized states – shelter theory and omnidirectional hedging, focusing on their dimensions, assumptions, and explanatory scope. The analysis is based on primary and secondary sources: works of Olli Suorsa (2017), who developed the omnidirectional hedging strategy, and Baldur Thorhallsson, who developed shelter theory, as well as other authors like Wivel and A. Ingebritsen (2019), Pedersen, R. (2023), Munir, M. and Safdar, A (2024), Kuik, C.C. (2008), Rangsimaporn, P. (2023), etc. This approach focuses on theoretical synthesis, aiming to contribute to the development of small state foreign policy theory. Rather than proposing a universal model applicable to all regions, this article primarily focuses on small and medium-sized states operating in asymmetric geopolitical environments, particularly in post-Soviet Eurasia and Southeast Asia.

3. SHELTER STRATEGY IN THE FOREIGN POLICY OF SMALL STATES

Shelter theory was developed to analyze the consequences of the relative power asymmetry that exists between great powers and small states and has been presented as an alternative to the existing theories (see Picture 1) of bandwagoning and hiding, which are used to ease the consequences of power asymmetries and manage the trade-offs between the costs of entrapment and abandonment (Pedersen, 2023).

Picture 1. Foreign policy strategies for small and medium sized states**Foreign policy strategies for small and medium sized states**

Source: compiled by the authors

This theory suggests that small states might need external shelter to cope with economic and political risks, it was introduced by Baldur Thorhallsson in 2011 (Thorhallsson, 2011). The need for such a theory appeared from the fact that international relations theory literature has limited analysis of small states' behaviour, and many of them assume that such countries operate on the same logic as great ones. Such equalization of states is incorrect, because small states face different disadvantages, have different needs, and a shelter is needed from a third party for their survival and prosperity (Thorhallsson & Steinsson, 2024). In this case, shelter theory can be understood as a small state's strategy, which aims to form alliances with a stronger country or seek membership in an international organization to reduce the political, economic, and societal vulnerabilities related to smallness (Wivel & Ingebritsen, 2019). These three spheres are the main attributes or dimensions according to shelter theory, and countries seek to increase their resilience here (Pedersen, 2023). Importantly, where regional dynamics are increasingly shaped by economic interdependence and China's expanding influence, shelter strategies may also reflect attempts by smaller states to mitigate risks associated with asymmetric engagement with major regional powers.

It is important to emphasize that shelter theory rejects the neorealists' approach that countries are functionally undifferentiated, facing the same challenges and opportunities. And while the bandwagoning strategy understands alliances as "aligning with the most powerful or threatening actor" (Kulali Martin, 2019), where small states simply follow the agenda of the great powers in the alliance (Pedersen, 2023), shelter theory insists that small states are fundamentally different and align not just for international security or status in the international system, but also to address internal weaknesses, like lack of various resources, indigenous knowledge, underdeveloped infrastructure, and limited public administration capacity, and how to overcome them. For this purpose, usually membership in different international organizations, e.g., the European Union, International Monetary Fund, Nordic Council, or cooperation with larger countries/powers is used. This internal weakness is accentuated because of the fact that traditional theories fail to consider the inherent structural weaknesses, including the ability of most small states to maintain the minimal state structures necessary to formulate and implement domestic policies, as well as whether small states shall maintain their presence (even minimal) at the international level (for example, Iceland). In this way, shelter theory offers a more comprehensive view of why small states seek support from larger powers and institutions (Thorhallsson et al., 2019).

Political shelter covers diplomatic, military, and the capacity of domestic political institutions backed by another state or international organization (Thorhallsson & Vidal,

2023). The necessity of political shelter and support from the third party is explained because of the facts, that small economies and low-population countries are militarily weak, have less power and fewer tools, including time, in disputes with other states, and it is harder to effectively run the country and ensure its functions. This shelter also explains why small states rely on international law and norms. The latter shapes the behaviour of large states and sets the standards for interactions between countries of different sizes. In this case, political shelter reduces the vulnerability of small states to coercion, decreases the power asymmetry between small and large states, and enables small states to act more effectively and functionally (Thorhallsson & Steinsson, 2019).

Economic shelter is considered a necessity for such small states that are vulnerable in productivity, investment, resources, domestic markets, trade, sectoral diversity, export dependence, fiscal institutions, and economic fluctuations (Kulali Martin, 2024). This need is explained by the fact that small states have tiny markets and are more reliant on the import and export of goods, and any shock or crisis in the market requires economic assistance from external financial authorities. In this case, large states are not so vulnerable because they have bigger domestic markets, resources and diversity (Thorhallsson & Steinsson, 2019). So, economic shelter might be described as a form of direct economic aid, help from an external financial body, a common market, favourable access to the markets (Thorhallsson and Vidal, 2023), and the formation of domestic buffers, which help to minimize the dangers from the international economy (Thorhallsson & Steinsson, 2019).

Societal shelter is the third and final principle of shelter theory and it addresses the fact that small states might experience isolation and societal stagnation, because of a lack of native knowledge (Thorhallsson & Vidal, 2024) – it is difficult to attract or raise influential artists, entrepreneurs or leaders who would enable generation of innovations and ideas, because of the small society and scale of economy, and the existing homogeneity, entrenched traditions and interests or risk aversion hinder the development of the market of ideas and challenge the existing elite, what leads to the reduced development of knowledge of the society (Thorhallsson & Steinsson, 2019). At the same time, the influence of big ideas from larger countries which might be also harmful to indigenous societies in this case (Hardy, 2024). To avoid such situations, small states try to circumvent isolation and social stagnation (Thorhallsson & Vidal, 2023) by creating good relations with other societies and developing economic cooperation, especially attracting investments, which allows them to receive new technologies and innovations (Mukhametov, 2020) and not to become only consumers of final products. Furthermore, the development of educational ties provides people from small states an opportunity to access the world's leading educational institutions (Thorhallsson & Vidal, 2024), which enables them to increase their native knowledge and bring new ideas to their own country. Such intersocietal interactions, transparency of borders, cultural sharing, new ideas, and innovation might be beneficial for all states (Yeliz, 2024).

What is more important to mention when speaking about the shelter strategy, even though it can improve the political, economic, and societal viability of small states, it can also cause costs that should be considered. One of the highest costs is the potential to give up sovereignty, as some small states may fully integrate into larger political entities or accept wide external influence to gain protection. This dependency can be used by shelter providers through political interference, cultural imposition, and economic

control. Furthermore, rescue efforts, such as financial support, often come with stringent conditions that weaken domestic autonomy and may even result in direct governance by foreign countries or organizations. Culturally, small states risk losing national identity due to the disproportionate influence of external media and values. Joining international organisations can be helpful, but it can also overwhelm small governments with limited staff and create extra rules they must follow (Thorhallsson & Steinsson, 2019).

The research on international relations even though admits contribution of the shelter theory for small states studies on regional cases or system level analysis, but at the same time express critics to it, because it is difficult to evaluate if a small state establishes an alliance in order to obtain support or because it considers said state as a threat and it should be treated as bandwagoning – as an example is taken Iceland's and China's cooperation in Arctic, where China is showing it's interest and increasing role in the region might be a threat. It is also complicated to assess if the gains cover losses, which are required for a good balance policy, especially for the social shelter (Yeliz, 2019). Furthermore, it's not fully discussed and explained what happens if a shelter provider changes its foreign policy position and abandons the recipient. In such cases, the latter has either to renegotiate or remain abandoned and risk being overwhelmed by other (regional) hegemony or overcome by environmental, economic, or financial crises (Baldachino, 2018). Besides, the theory itself tries to combine insights from (neo)realism, liberalism, and constructivism what might lead to the creation of a “theoretical mixed salad, where many ingredients go well but without a logically coherent whole” (Wivel and Ingebritsen, 2019). So, further development of the theory is needed, and it must show its ability to compete with less complex analytical constructs such as bandwagoning by using additional empirical cases (Wivel & Ingebritsen, 2019).

Thus, the search for shelter is not a simple process and has its advantages and disadvantages, as small states must navigate complex relationships that balance protection from the third party and sovereignty. When small states realize that their shelter starts exploiting them and harassing their independence, they might start looking for another shelter provider or providers to ensure their own security and reduce potential costs. For example, in the context of Central Asian countries, Russia was the most influential power for the region's countries and was responsible for the security, economic, and, can also be interpreted as, social spheres. Political regimes and elites of these countries treated it positively because they perceived Russia as a relatively predictable security and economic partner, despite underlying asymmetries and potential long-term risks. The situation has changed since 2014 and the first Russian territorial annexations in Ukraine, and because of that, the first bells rang for Central Asia. After the full Russian invasion of Ukraine in 2022, it has become clear that the country, which was treated as a shelter from everything, is not trustworthy anymore, and some changes in foreign policy shall be applied. In such a case, hedging as a foreign policy strategy, and its form – omnidirectional hedging in particular – might be seen as a solution. As a result, many of these states have increasingly adopted diversification strategies associated with omnidirectional hedging, which allows them to navigate between multiple external partners while maintaining greater strategic flexibility and domestic stability. This transition provides an important conceptual bridge between shelter theory and hedging approaches.

4. OMNIDIRECTIONAL HEDGING STRATEGY IN THE FOREIGN POLICY OF SMALL STATES

Olli Suorsa introduced the concept of an omnidirectional hedging strategy to international relations theory in 2016. He stated that states are encouraged to broaden their cooperation beyond the binary decision because of the disproportionate losses involved in selecting between two large powers (what is the idea of a hedging strategy), because it might cause long-term political or strategic losses, like isolation or abandonment, which would lead a state to either balance or bandwagon with a great power (Munir & Safdar, 2024). In this case, states choose to place a higher priority on forming security, diplomatic, and economic ties with secondary or even tertiary powers in the area ². Such policy would lower tensions in the strategic environment while simultaneously expanding their strategic space inside the regional system (Suorsa, 2017). Diversifying connections and resources in the diplomatic, security, and economic domains delays or even eliminates the need to choose between two great powers, hence lowering asymmetric relationships with them, and this is known as a win-win situation (Nagy, 2017). At the same time, such diversification enables states to compensate for a variety of risks arising from high uncertainty (Rangsimaporn, 2023). Importantly, in the contemporary post-Soviet Eurasian regional order marked by overlapping pressures from Russia, China, Western actors, and regional institutions, as well as dense regional interdependence, such diversification strategies have become particularly relevant for small and medium-sized states seeking to preserve autonomy without direct confrontation.

As Suorsa Argues, the omnidirectional hedging strategy protects middle and small powers from several key issues:

1. *Avoiding entrapment* – by increasing the number of balancing actors, it becomes more difficult for a single major power to impose its will (Suorsa, 2016) and turn a state into a pawn in great power rivalries (Rangsimaporn, 2023).
2. *Preventing abandonment* – by differentiating relationships with other countries and involving several emerging or re-emerging regional and other regional powers – secondary or tertiary – benefits the actor by securing wider regional and international support with shared strategic interests, thus delivering mutual support and circumventing pressure from the remaining stronger side (Suorsa, 2017).
3. *Reducing interdependence in security* – diversifying two-sided security and military ties reduces reliance on a single provider of military technology and equipment (Suorsa, 2016), allowing the state greater flexibility in maneuvering.

According to Suorsa, omnidirectional hedging works as the diversification of a state's strategic relationships, offering small states a strategic alignment tool that, in comparison to bilateral hedging, enables them to more easily manage their relative strategic space. This becomes even more significant for states that frequently experience transitions between democracy and non-liberal rule, particularly following military or nonviolent coups, because it allows them to diversify diplomatic support and circumvent isolation in the international arena. Consequently, this guarantees strategic autonomy at both the systemic and unit levels (Suorsa, 2017).

In this case, Munir, M., and Safdar, A. simplified the definition, describing omnidirectional hedging as a strategy that permits traditional middle powers to increase their strategic space and escape the traps of great power rivalry through economic, diplomatic, and

² In his work, the authors spoke about the countries of Southeast Asia or ASEAN, where the interests of the United States and China mainly intersect, therefore he named Japan and India as countries playing a secondary role, and included Russia and South Korea as third.

security diversification (Munir & Safdar, 2024). These three dimensions directly correlate with shelter theory, where the diplomatic and security aspect is covered by political shelter, and the economic aspect remains common to both theories. Drawing forward upon the works of Suorsa (2016, 2017), Nagy (2017), and Gerstl (2020), the authors summarized the key attributes (dimensions) of the strategy, as indicated in Table 1. According to Munir, M., and Safdar, A., reviewing these dimensions and indicators allows us to verify whether a state's foreign policy is associated with omnidirectional hedging (Munir & Safdar, 2024). However, their analytical framework only partially responded to the main idea of Suorsa, Nagy, and Gerstl, because their analytical framework restricted strategy to middle powers and left small states aside. Theoretically, Munir and Safdar's presented model may also be extended to small states, as they also employ hedging strategies in their foreign policies. Moreover, the model's conceptual foundation is based on theoretical frameworks constructed for a broader spectrum of states, rather than being solely addressed to middle powers.

Speaking further about the criticisms of omnidirectional hedging and hedging strategy as such, it is noted that, as and for the shelter theory, its definition is not fully developed and it is difficult to find examples proving that such a strategy is used, as it is rarely presented in official state documents or foreign policy strategies presented by states (Wilkins, 2021). Another aspect used to express criticism is the argument that the analytical level of the hedging strategy is quite limited. It is argued that every state with options does not even attempt to hedge but simply uses it eventually without significant calculations. Therefore, introducing additional concepts into the theory of international relations is excessive and meaningless, especially since this strategy is difficult to define or verify (Wilkins, 2021). These arguments are like those, which are used for shelter theory.

Table 1. Dimensions and Indicators of Omnidirectional Hedging

Dimensions	Indicators
Diplomatic	Greater diplomatic support, joining new institutions/organizations, strategic engagement with adversary, neutrality and soft power
Economic	Free trade agreements, joining financial institutions, participation in regional economic frameworks, expanding trade partners, Foreign Direct Investment (FDI)
Security	Joint exercises, security/defence pacts, arms trade, internal balancing

Source: Munir, M. and Safdar, A. (2024). "Sino-U.S. Strategic Competition in the Asia-Pacific: Omnidirectional Hedging of Traditional Middle Powers". *Strategic Studies*, Vol. 43, Number 2(2), 21-44,

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The model presented by Munir, M. and Safdar, A. (2024) could be expanded by incorporating the factor of public support or the social dimension for the state's foreign policy and its institutions, because this element, as it is described in shelter theory, is one of the core aspects for the development of small states. Even though authors excluded such countries from their model, as explained above, such a decision contradicts the main ideas of the developers of hedging or omnidirectional hedging theories – Suorsa,

Nagy, Gerstl, or C.C. Kuik – who accentuated the applicability of their theory to small states. Incorporating this dimension is particularly important in Central Asia as part of the broader post-Soviet Eurasian order, where domestic stability, public opinion, and societal openness increasingly interact with external pressures.

Although the public support element is more difficult to measure in certain types of countries, such as authoritarian ones, its necessity remains important in the sense that if citizens do not grant a mandate to the foreign policy being implemented, it is highly likely that the government will face internal resistance, which may also trigger domestic political crises. This could be observed in Georgia at the end of 2024 (Gogia & Kirova, 2024), when the government decided to halt the EU accession process, in protests in Slovakia at the beginning of 2025 against the Prime Minister's pro-Russian policies (The Guardian, 2025), and in similar cases. As C.C. Kuik (2008) wrote, the ruling elite primarily concerns itself with political survival. Thus, after assessing the opportunities and potential threats of newly emerging or neighboring powers, it makes corresponding foreign and domestic policy decisions that enable it to consolidate its authority within the country. These decisions are based on economic, political, and security dimensions and are aimed at ensuring internal cohesion, which in turn legitimizes both the policies being implemented and the government itself (Kuik, 2008).

Therefore, the inclusion of a social dimension within the framework of omnidirectional hedging is essential. It allows us to link external diversification strategies with domestic legitimacy, explaining how foreign policy choices are sustained over time. This expanded framework is particularly useful for analyzing small and medium-sized states in Central Asia as part of the broader post-Soviet Eurasian order, where governments must simultaneously navigate overlapping pressures from Russia, China, Western actors, and regional institutions, while also managing economic interdependence and societal transformation.

5. THE SOCIAL DIMENSION IN OMNIDIRECTIONAL HEDGING STRATEGY. KAZAKHSTAN AND UZBEKISTAN AS CASE STUDIES

Public support, or the societal dimension, for foreign policy issues is particularly important in democratic states, where society is more engaged and the institution of freedom of speech operates, as incorrect decisions will be quickly communicated and will most often result in removal from office (Baum, 2013), for example, through impeachment, protests, or subsequent elections. The choice of actions is determined by the consequences arising from the implementation of specific foreign policy decisions. The significance of public opinion is also explained by several studies – for instance, it has been established that after World War II, public opinion became one of the factors influencing presidential election voting results in the U.S., with foreign policy issues having a significant impact on voting behavior in five out of nine election campaigns, where voters rationally evaluated politicians' proposals. This connection is further confirmed by additional studies analyzing the extent to which shifts in public opinion align with the actual implementation of foreign policy – 67% of 222 cases matched the policy directions preferred by society, and the alignment rate for foreign policy examples was even higher, reaching 92% (Chun, 2022).

Nevertheless, there is another theory, the elite-centric theory or the Almond-Lippmann consensus, which asserts that decision-making is perceived as a top-down process.

This idea is based on the notion that society is dependent on the elite, and government decisions, including those in foreign policy, are transmitted to the public. Such actions and perspectives are founded on the belief that society is unfamiliar and unreliable; mass opinion tends to be volatile and frequently shifting, and public opinion itself has little influence on foreign policy. If there is any connection between these two aspects, it is mostly based on the executive branch's leadership and public support, as presidents have significant control over the broadcasting of information (Chun, 2022). This narrative is perhaps best understood and applied in non-democratic states, where all or most decisions are made in a top-down manner, where freedom of the press and speech is restricted, making it more difficult or even impossible for people to express their (dis) approval of foreign policy and to participate in political life (Baum, 2013). In such cases, measuring the degree of public influence can be quite challenging, but that doesn't negate its significance in general.

The proposed framework can be empirically illustrated through selected cases from Central Asia. Regional states provide a particularly relevant empirical context where governance structures often combine elements of authoritarianism with increasing societal exposure to global processes (except perhaps Turkmenistan). While decision-making is largely top-down, these societies are not isolated; they are increasingly influenced by information flows, economic openness, and regional interdependence. Kazakhstan represents a particularly illustrative example of how societal factors interact with foreign policy strategies resembling omnidirectional hedging. This interpretation is also supported by recent research on Kazakhstan's geoeconomic hedging strategy, which highlights how the country strategically engages with multiple external initiatives – such as China's Belt and Road Initiative and the European Union's Global Gateway – to diversify its partnerships, mitigate risks, and maximize strategic autonomy (Santos & Borges, 2026).

For example, in a 2022 survey conducted in Kazakhstan, respondents were asked in which direction the country's foreign policy should be oriented. The majority (73.3%) supported a continued multi-vector policy, while only 0.7% favored a pro-China direction (Kushkumbayev & Bakhtiyarova, 2024). Therefore, it can be assumed that if the ruling elite of the country suddenly decided to pursue a pro-China foreign policy, it could face public or other elite resistance, where the latter could mobilize parts of society (Akchurina, 2022). When Uzbekistan received observer state status in the Eurasian Economic Union (in 2020), this step was negatively accepted by the Uzbeks. The president had to explain himself, as he was opening the country to everybody, and it does not mean that from now on the country will work only with the Eurasian Economic Union and Russia, and Uzbekistan will seek to join the World Trade Organization (Silvan & Moshes, 2025). Moreover, in a country like Kyrgyzstan, three revolutions have already taken place – although they were primarily linked to demographic, social, economic, and domestic political factors, the geopolitical (foreign policy) aspect remains important, even if less pronounced (Ivanov, 2022). This example of Kyrgyzstan illustrates Morgan, M.C.'s (2025) words that one of the main rules of diplomacy and geopolitics is that foreign policy depends on domestic (internal) policy and that they are inseparable (Prashmantas, 2025).

On the one hand, societies are usually suppressed and alienated from power in authoritarian regime countries (Ibadildin, 2024), but when there is a mutual threat to the regime and society, a common understanding might be found (Ibadildin, 2024). As an example, the Russian-Ukrainian war is given: when it started, the Kazakh people instantly began sharing information about the war on social media, several Ukraine-supporting meetings were held, scholarships for students were announced, humanitarian aid was collected and

sent, etc. It is agreed that without political or regime support, such actions could not have been made, and this is explained by noting that Russia was perceived as a possible threat to the country (Ibadildin, 2024). This proves that society is not left outside the foreign policy.

Furthermore, shelter theory's societal dimension and its ideas that investments, people-to-people contacts, cultural and educational cooperation are useful for the vitality and development of the country and its foreign policy – especially for small ones (described in the paragraph about the social dimension above) – might also be applied to non-democratic regimes. As an example, Uzbekistan can be taken, a country whose former strong authoritarian regime was highly restrictive and posed the main issue for forming a civil society, as the country was quite closed (Hanley, 2023). The situation has started changing since 2017, when President Shavkat Mirziyoyev's administration came into power. The administration began to pursue a reform agenda, liberalizing the economy while strengthening social welfare, and announced the government's national strategy "Uzbekistan-2030" (Embassy of the Republic of Uzbekistan in the Republic of Latvia, 2025) in 2023. One of the aims of this strategy is "the development of human capital, providing for the creation of a system of education, medicine and social protection that fully meets the needs of the people and international standards" (Sharipov, 2024). To fulfill this aim spending on education increased (from 4,5% of GDP in 2017 to 7% of GDP in 2023) (Asian Development Bank, 2025), study programs were aligned with Western practices, the government seeks to increase the attractiveness of higher education for investments from abroad (Numanova, 2023), and the number of Uzbek students studying abroad increased from about 35 thousand in 2017 to more than 150 thousand in 2022 (Mitchel, 2024). Speaking further about people-to-people contacts, tourism should be mentioned as an indicator and the number of tourists counted: inbound tourism rose from 1,5 million in 2020 to 7,96 million in 2024 and outbound tourism increased from 2 million in 2020 to 6,2 million in 2024 in Uzbekistan (National Statistics Committee of the Republic of Uzbekistan, 2025). This openness is related to the fact that the country seeks to attract more international investments and attention from other countries, which leads to the development of the state (President of the Republic of Uzbekistan, 2025). Nevertheless, Uzbekistan continues to suffer from restrictions on freedom of speech and barriers to the legal registration of non-governmental organizations, and the majority of them are actually government-organized (Matvienko, 2021).

Considering these factors, a fourth-dimension social should be included when evaluating both the omnidirectional hedging strategy and the implementation of other strategies. This dimension could be based on shelter theory (described above) and its societal shelter principle, which argues that social isolationism and the inability to assimilate or develop new ideas and technologies can lead to the stagnation of the state and society. Countries should be interested in a certain level of cultural, economic, or educational links between their own and other societies. The model itself would appear as follows: see Table 2. The only difference depends on the regime of the country: if it is a democratic country, then it is possible to look for data on public support for the foreign and internal policy of the country; if it is a non-democratic regime, then it can be checked how the ruling regime and elites include society in the formation of foreign policy by developing the education system, allowing people-to-people contacts, etc. In this way, it allows us to measure how people participate or are involved in the development of countries' foreign policy, and it demonstrates that the country's foreign policy reflects both the ruling regime's and society's needs, justifying why this particular approach is being pursued and how it influences public life.

Table 2. Proposed Extension of the Dimensions and Indicators of Omnidirectional Hedging

Dimensions	Indicators
Diplomatic	Greater diplomatic support, joining new institutions/organizations, strategic engagement with adversary, neutrality and soft power
Economic	Free trade agreements, joining financial institutions, participation in regional economic frameworks, expanding trade partners, Foreign Direct Investment (FDI)
Security	Joint exercises, security/defence pacts, arms trade, internal balancing
Social	Public support for the internal and foreign policy which is under implementation by the political regime (if it's measurable); cultural, educational, technological ideas and practices; degree of isolation and barriers between the state and the outside world.

Source: compiled by the authors

The inclusion of the societal dimension does not replace the existing diplomatic, economic, and security dimensions of omnidirectional hedging. Instead, it complements them by explaining how foreign policy strategies are legitimized domestically and sustained over time. This fourth dimension would enable the omnidirectional hedging strategy to explain the foreign policy of states in a more comprehensive and precise way, and at the same time reduce, to some extent, the criticism of the (omnidirectional) hedging strategy for its lack of depth or narrowness. Moreover, the inclusion of a social dimension would ensure logical continuity with other foreign policy strategies and with shelter theory in particular, where the social dimension is one of the cornerstones. In this way, we could establish a clear chain of strategies for small and medium-sized states in their foreign policy (see picture No. 1 above), which also contributes to the ongoing debate on how small and medium states might adapt and maintain their sovereignty in a changing international system.

6. CONCLUSION

The changing geopolitical situation and international system in the world require scholars of international relations and foreign policy to reassess how states formulate and implement their foreign policies. Taking into account the fact that, after the end of the Cold War and the dissolution of the Soviet Union, new countries and new power centers appeared, traditional approaches to foreign policy such as balancing, bandwagoning, or neutrality remain useful for describing patterns of foreign policy behaviour, but they are often insufficient for explaining the multidimensional strategies employed by small and medium-sized states in a multipolar environment. This limitation becomes particularly evident in the context of the contemporary Post-Soviet Eurasia international order, where regional dynamics are shaped by the interaction of major powers such as Russia, China, the United States, and regional actors, creating complex environments in which small and medium-sized states must simultaneously pursue autonomy, stability, and development. This is why this article argues that shelter theory and the omnidirectional hedging strategy might serve as valuable middle strategies that explain how states with limited capabilities can navigate between dependence and autonomy. It is agreed that these strategies are still not fully developed, theoretically fulfilled (as this article demonstrates as well), and empirically tested, but their notion that the international system is not based only on

major powers and small states do not have the third choice except to align or balance with them is more than worth further analysis.

Speaking about these middle strategies of foreign policy and omnidirectional hedging, particularly, it is worth saying that both are created to explain small and middle power states' foreign policy and how they could reduce vulnerabilities, avoid entrapment and abandonment, and increase resilience. Yet they differ in their mechanism and scope. Shelter theory focuses on ensuring protection through political, economic, and societal support from stronger players or institutions and is more related to bandwagoning, while omnidirectional hedging seeks to expand diplomatic, economic, and security cooperation to maintain strategic flexibility and is more related to balancing.

The key contribution of this article lies in identifying and addressing a crucial gap between these two approaches—namely, the absence of a social dimension in omnidirectional hedging. While shelter theory explicitly incorporates societal factors, omnidirectional hedging has traditionally focused on material and strategic dimensions. This difference may be partly explained by the fact that shelter theory has primarily been applied to democratic contexts, while hedging approaches have often been used to analyze a wider variety of political systems, including non-democratic regimes.

Nevertheless, the findings of this study demonstrate that societal factors cannot be excluded from the analysis of hedging strategies. If states aim to maintain long-term stability and development, channels for societal interaction, knowledge exchange, and public legitimacy must be considered. By incorporating the social dimension into omnidirectional hedging, this article provides a more comprehensive analytical framework that links external strategic behaviour with internal societal dynamics. This extension is particularly relevant in Asian contexts, as illustrated by the cases of Kazakhstan and Uzbekistan. Kazakhstan's multi-vector foreign policy demonstrates how societal support reinforces balanced engagement between major powers, while Uzbekistan's strategy of openness shows how investment in education, mobility, and societal development strengthens diversification and external engagement. These examples suggest that omnidirectional hedging is not only a strategy of external alignment, but also a socially embedded process that depends on domestic legitimacy, institutional capacity, and openness.

From a policy perspective, the findings of this article highlight several important implications. First, foreign policy strategies that ignore societal dynamics risk losing domestic legitimacy, which may undermine their sustainability over time. Second, external actors engaging with Central Asian states, particularly in the context of China's expanding regional influence, should recognize that long-term cooperation depends not only on economic and security considerations, but also on societal acceptance and internal stability. Third, policies that promote educational exchange, cultural interaction, and openness can indirectly strengthen strategic partnerships and reduce geopolitical risks by supporting domestic resilience. Finally, the inclusion of a social dimension ensures greater theoretical coherence between shelter theory and hedging approaches, and contributes to the broader debate on how small and medium-sized states adapt to changing international environments. It also provides a more flexible and empirically applicable framework for analysing foreign policy behaviour in regions characterized by high uncertainty and complex interdependence.

Future research should empirically test the proposed model through comparative case studies, particularly across different regions of Post-Soviet Eurasia, examining how societal openness, public legitimacy, and domestic transformation influence the

implementation of hedging strategies in small and medium-sized states. Furthermore, it could investigate how small- and medium-sized states' strategies interact with the responses of larger, more powerful countries, including their willingness to support, permit, constrain, or tolerate particular strategies.

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The authors declare no conflicts of interest.

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SHANGHAI COOPERATION AS A MECHANISM FOR REGIONAL INTEGRATION IN CENTRAL ASIA

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ABSTRACT. *This study examines the Shanghai Cooperation Organization as a tool of regional integration in Central Asia based on an analysis of its official language from 2015 to 2025. The study addresses a key gap in the literature by examining how regional integration is articulated and prioritized in official SCO discourse and how the relative salience of different areas of regional cooperation has changed over time. The study used a mixed-methods approach combining qualitative content analysis with quantitative frequency analysis of 41 official SCO documents, including declarations, statements, and joint communiqués. The coding scheme included six analytical categories: integration, economic cooperation, political coordination, energy and transport, humanitarian cooperation, and security. The results show that the SCO functions more as a hybrid institutional platform than as a traditional model of deep regional integration. Economic cooperation accounts for 26.8%, and security for 20.3% of the organization's discourse, constituting the core of its activities. Longer-term analysis shows a significant shift from security-focused priorities in 2015-2019 to a more economically oriented and diverse agenda in 2020-2025. However, integration remains largely a matter of debate, reflected in ideas such as multipolarity and the "Shanghai spirit," rather than established mechanisms. This study complements existing literature by providing a systematic long-term analysis of SCO documents and linking discourse to measurable models of collaboration. The findings highlight the importance of flexible, consensus-based regionalism in a multipolar world and suggest that the SCO offers an alternative model for regional engagement through selective cooperation and adaptability.*

KEYWORDS: *Shanghai Cooperation Organization, regional integration, Central Asia, content analysis, economic cooperation, security, discourse.*

1. INTRODUCTION

As world politics and power have shifted, regional organizations have become important players in creating new ways for countries to interact. Central Asia, located at the intersection of major geopolitical interests, is a pivotal region where various

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integration efforts converge and influence one another. The Shanghai Cooperation Organization (SCO) has become one of the leading platforms in Eurasia, bringing together major regional and global powers such as China, Russia, and the Central Asian states. Since its inception in 2001, the SCO has grown in both size and functionality and now addresses issues such as security cooperation, economic growth, infrastructure development, and humanitarian activities. The growing importance of the SCO is evident as global governance changes, cooperation with non-Western countries grows, and demand for various models of regional integration increases. Therefore, understanding how the SCO works and how effective it is as an instrument of integration in Central Asia is a relevant and important research task (Wang, 2019; Proń, 2023). The research focuses mainly on its role in security cooperation, especially in combating terrorism, extremism, and separatism (Akmadi, 2021; Uzakbayev & Movkebayeva, 2022). Other studies look at the SCO in a broader geopolitical context, often highlighting the strategic interests of major powers. In the present study, regional integration in relation to the SCO is not understood as a classic model of deep institutional integration involving the transfer of some national powers to supranational bodies, the formation of a common market, or the unification of national policies. In the context of the SCO, regional integration is seen as a more flexible and selective process of rapprochement of states, realized through regular political coordination, security cooperation, development of economic links, transport and energy interconnectedness, as well as humanitarian interaction, while preserving state sovereignty and the consensual nature of decision-making. For the Central Asian states, such a model is particularly important because the SCO provides an institutional framework through which Kazakhstan, Kyrgyzstan, Tajikistan, and Uzbekistan participate in shaping regional priorities, agree on security positions, and expand economic and infrastructure engagement with the larger regional powers. Thus, in this article, integration is not evaluated by the degree of transfer of sovereignty or the creation of supranational institutions, but by how different directions of regional convergence are formulated, prioritized, and institutionalized in the official discourse of the SCO. However, there is a significant gap in the literature regarding detailed analysis of the SCO as an instrument of regional integration, including its official statements and underlying dynamics. Few existing studies combine qualitative analysis of official documents with quantitative assessment of key topics over time. Little attention has been paid to how formal commitments to regional cooperation are articulated, prioritized, and institutionalized in official SCO discourse, particularly in relation to Central Asia. This creates a need for a systematic longitudinal analysis capable of tracing changes in the relative prominence of different areas of regional cooperation over time. In this study, regionalism refers to the institutional and political framework through which states organize regional cooperation, regionalization denotes the broader process through which regional interactions become more intensive. In contrast, regional integration is used analytically to describe the increasing coordination and institutionalization of cooperation across specific functional areas without implying the transfer of sovereignty to supranational institutions.

The study aims to determine how regional integration in Central Asia is conceptualized and reflected in the official discourse of the Shanghai Cooperation Organization, as well as to identify changes in the relative importance of its main economic cooperation areas, security, political coordination, energy and transport, humanitarian cooperation, and integration rhetoric between 2015 and 2025.

The study is based on the following main research question: *How is regional integration in Central Asia constructed and prioritized in the official discourse of the SCO, and how has the relative importance of its main directions changed between 2015 and 2025?*

Additional research question: *How do integration priorities differ between the SCO Council of Heads of State and the SCO Council of Heads of Government?*

The research contributes to existing literature in several ways. First, it provides a systematic, long-term analysis of SCO documents over 10 years, from 2015 to 2025, and identifies shifting priorities and trends. This period was selected because it captures a decade of substantial institutional and geopolitical transformation within the SCO, including its membership expansion and the diversification of its cooperation agenda. It also provides a sufficiently long and continuous timeframe to trace changes in thematic priorities beyond individual summits or short-term political events. Second, it uses a mixed-methods approach that combines qualitative content analysis with quantitative assessment, thereby enhancing methodological rigor. Third, the study provides insight into the relationship between political discourse and integration processes, and promotes a broader discussion of regionalism and international institutions in non-Western contexts.

Theoretical basis of research. The SCO represents a particular model of regionalism, distinct from classical integration paradigms and often referred to as "soft regionalization" or "informal institutionalism", characterized by low levels of supranational power; flexible mechanisms of cooperation and emphasis on political dialogue rather than deep economic integration (Acharya, 2016; Allison, 2008). The model is closely linked to the normative principles of the so-called "Shanghai spirit," which places mutual trust, equality, respect for sovereignty, and non-interference in domestic affairs at its core (Karrar, 2017; Xue, 2021). The principles assume that the SCO functions not as a traditional integration project but as a hybrid institutional platform that combines elements of security cooperation, economic coordination, and diplomatic engagement. In the context of Central Asia, this model of regionalism is particularly important. Kazakhstan, Kyrgyzstan, Tajikistan, and Uzbekistan are not only geographical spaces for implementing SCO initiatives but also member states involved in shaping the organization's regional agenda (Dadabaev, 2014; Bourdais, 2026). For them, cooperation within the SCO is developing in conditions of the need to simultaneously preserve national sovereignty, ensure regional security, expand economic links and transport interconnectedness, as well as build relations with the larger powers - primarily China and Russia. Therefore, the regionalization of Central Asia within the SCO does not imply the formation of a single supranational space along the lines of the European Union (Karami & Mozaffari, 2026). It is manifested primarily through the alignment of interests, policy coordination, and development of cooperation in individual functional areas. In this sense, the Central Asian states should be seen not only as objects of influence by major powers, but also as autonomous participants in regional interaction, able to use the SCO's institutional mechanisms to advance their own security priorities. Economic development and regional interconnectedness. To fully understand the nature of the SCO, one must consider constructivist theory, which emphasizes the importance of ideas, norms, and discourse in shaping international relations (Karrar, 2017). From a constructivist perspective, international institutions are not only formal structures but also socially constructed arenas where shared meanings and identities are created and reproduced.

Official documents, including declarations and pronouncements, play a crucial role in this process by formulating priorities, legitimizing collective action, and defining the organization's role in the international system. In this context, discourse becomes a key analytical dimension for understanding how the SCO functions. By exploring how concepts like "security", "cooperation", and "integration" are formulated and prioritized in official texts, it can be assessed to what extent the organization promotes a coherent integration program or serves primarily as a platform for policy coordination.

2. LITERATURE REVIEW

Studies of the Shanghai Cooperation Organization have identified several interrelated areas of analysis. The first examines the SCO through the lens of regionalism and institutional development, highlighting its differences from classical integration models grounded in supranational governance. Under this approach, the SCO is characterized as a flexible institutional framework in which the preservation of state sovereignty, consensus-based decision-making, and functional cooperation are more important than the devolution of powers to supranational institutions. (Dadabaev, 2014; Rauf, 2020; Yuan, 2023). Current studies also show that the SCO's expansion of membership and institutional evolution have gradually transformed it from a predominantly security-oriented grouping into a broader regional governance framework encompassing economic, infrastructure, and policy issues. A key area of modern research is the SCO's role in managing regional security and its effective promotion of cooperation in combating terrorism, extremism, and cross-border threats, especially through the Regional Anti-Terrorist Structure (Cooley, 2021; Pantucci, 2021). However, this focus on security has been criticized for ignoring other aspects of the SCO's work, including economic and infrastructure cooperation. In recent years, increasing attention has been paid to the SCO's economic potential, particularly in the context of China's "One Belt, One Road" initiative, which serves as a political and institutional platform for promoting linkages, trade, and investment in Central Asia (Akmadi, 2021; Pradhan & Mohanty, 2021). However, evidence suggests that economic integration within the SCO is uneven and largely bilateral rather than multilateral. The second area of research focuses on the roles of China and Russia in the SCO's institutional development. The Organization is both a space for cooperation between two major powers and a mechanism for reconciling their partly divergent interests in Central Asia. Russia has traditionally emphasized security issues and the preservation of its political influence in the post-Soviet space, while China's growing role is linked to economic engagement, infrastructure, trade, and the broader promotion of its vision for a regional and international order. The development of the SCO should therefore be viewed not solely as a result of Sino-Russian rivalry or, conversely, of their strategic partnership, but as an institutional process in which cooperation and competition coexist. This interaction between the two powers affects both the organization's thematic priorities and the limits of its institutionalization (Yuan, 2023; Seiwert, 2023). At the same time, explaining the SCO's institutional development solely through the interests of China and Russia risks portraying the Central Asian states as passive political objects of larger powers. On the contrary, more modern approaches to Eurasian regionalism emphasize the ability of smaller states to leverage regional organizations to pursue their own strategies, diversify foreign-policy linkages, and expand policy space. In this regard, Kazakhstan, Kyrgyzstan,

Tajikistan, and Uzbekistan are not only members of the institutional framework formed by China and Russia but also actors capable of influencing the regional agenda through national security priorities: trade, transport connectivity, and economic development. The SCO provides these states with an additional multilateral platform to interact simultaneously with China, Russia, and other members of the organization without the need for deep supranational integration (Nasibov & Gawrich, 2025).

From a constructivist point of view, researchers emphasize the importance of common narratives such as "Shanghai Spirit" in legitimizing cooperation and forming a special regionalism model, and studies show that the SCO is not just an institutional instrument but also a platform where different views on the international order are expressed. Despite the expanding literature on the SCO, three related empirical gaps remain. First, relatively little research has systematically examined longitudinal changes in the thematic structure of official SCO discourse. Second, limited attention has been paid to changes in the relative salience of different dimensions of regional cooperation, including security, economic cooperation, political coordination, energy and transport, humanitarian cooperation, and explicit integration rhetoric. Third, existing studies rarely compare these priorities across different institutional levels of the SCO, particularly between the Council of Heads of State and the Council of Heads of Government. However, much less attention is devoted to a systematic longitudinal analysis of how the structure of the SCO's official discourse changes over time and how the relative importance of different areas of regional cooperation changes. It therefore remains unclear how the relative prominence of security, economic, political, transport and energy, humanitarian, and integration-related themes has evolved within official SCO discourse and whether these patterns differ across institutional levels. This study addresses these gaps through a systematic longitudinal content analysis of 41 official SCO documents published between 2015 and 2025. By tracing six thematic categories over time and comparing their relative salience between the Council of Heads of State and the Council of Heads of Government, the analysis identifies both temporal shifts and institutional differences in how the SCO constructs and prioritizes regional cooperation. It refers to explicit references to regional convergence, institutional development, membership and enlargement, shared regional frameworks, and broader normative visions of integration. References to economic, security, transport, political, or humanitarian cooperation are therefore not automatically coded as integration unless they contain an explicit regional or institutional dimension.

3. RESEARCH METHODS

Design of the study. The study is based on a longitudinal mixed content analysis of the official discourse of the SCO for 2015-2025. The methodological design combined qualitative directed content analysis with subsequent quantitative frequency analysis and the relative representation of thematic categories. The choice of such a design was due, on the one hand, to the need to define meaningful ways of constructing regional integration in the official discourse of the SCO, and, on the other hand, to establish changes in the relative importance of individual areas of cooperation over time and at various institutional levels of the organization. The quality stage involved interpreting the meaning of official documents and systematically assigning relevant textual fragments to pre-defined analytical categories. In the quantitative stage, coded

fragments were aggregated at the level of individual documents, time periods, and SCO institutional bodies. Thus, the frequency of code entries was regarded as an indicator of the discursive salience of the relevant subject rather than a direct indicator of the degree of actual implementation of integration initiatives. The empirical basis for the study consists of a corpus of 41 official SCO documents published between 2015 and 2025. Declarations, statements, joint communiqués, and other final documents adopted at two key institutional levels of the organization were included in the corpus: the Council of Heads of State and the Council of Heads of Government/Prime Ministers. The selection of documents was targeted based on several criteria. First, the document was to have an official status and be directly related to the activities of one of the two SCO institutional bodies under analysis. Second, the document was to be for the period 2015-2025. Third, its content should have included meaningful provisions outlining the priorities, directions, principles, or mechanisms for regional cooperation. Documents of an exclusively administrative or technical nature and not containing analytically significant provisions were not included in the body. The chosen time slot allowed for a medium-term transformation of the SCO's official discourse and avoided narrowing analysis to individual summits or single political events. For longitudinal comparison, the building was divided into two analytical periods: 2015-2019 and 2020-2025. This division was primarily used as an analytical tool for comparing the structure of discourse before and after 2020. It did not imply an a priori assertion that there was a one-off institutional breakthrough in 2020. Each document was assigned a unique identifier, and the year of publication, time period, and institutional level were added to the analytical base. This arrangement of the array has enabled consistent analysis at the levels of individual documents, time periods, and institutional bodies.

Unit of analysis and code development. The basic unit of coding was a meaning-unit proposal, a part of the proposal or a semantically complete fragment of text containing an autonomous provision regarding a specific direction of regional cooperation. The formal boundaries of a paragraph were not considered mandatory boundaries of a coding unit: one paragraph could contain several analytically independent entities. In contrast, several interrelated sentences could be interpreted as a single entity. If their separation resulted in a loss of context. Based on the research theoretical framework, research questions, and preliminary analysis of the literature, a hierarchical code system was developed. It included six parent thematic categories: integration (INT), economic cooperation (ECO), policy coordination (POL), energy and transport (ET), humanitarian cooperation (HUM), and security (SEC). The parent categories were further differentiated into narrower subcodes, reflecting the specific content dimensions of each direction. The Integration category (INT) covered institutional development of an organization, expansion and membership, as well as the normative bases of integration interaction, including the principles of the "Shanghai Spirit". The Economic Cooperation (ECO) category included trade and trade facilitation, investment and business interaction, digital economy, production cooperation and supply chains. Political coordination (POL) covered issues of sovereignty and non-interference, multipolarity and international order, and diplomatic coordination. The energy and transport (ET) category included transport, logistics, energy cooperation, energy transition and related infrastructure. Humanitarian cooperation (HUM) included health, education and science, cultural and public relations, climate issues, and sustainable development. The security category covered counterterrorism, extremism and separatism, border security, transnational crime, drug trafficking, and institutional arrangements for regional security. The fundamental methodological significance lay in distinguishing between integration rhetoric and individual forms

of functional cooperation. The use of cooperation, interaction, partnership, and semantically related terms in the document was not a sufficient reason to assign INT. The integration code was used only when the analyzed snippet had strong regional, institutional, or regulatory integration content. This criterion has made it possible to minimize the conceptual overlap between the category of integration and economic, political, transport, humanitarian, and security cooperation.

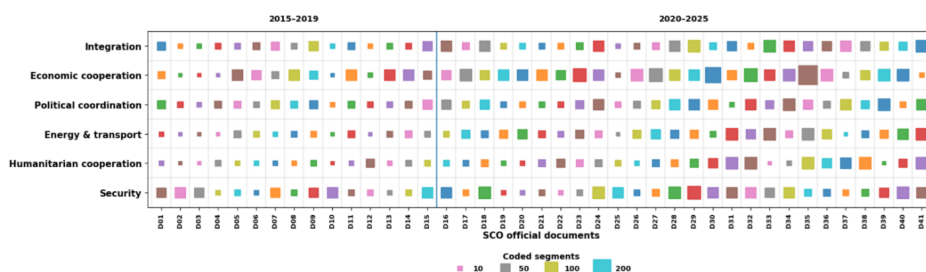
Encoding procedure. The body encoding was performed using MAXQDA. In the first phase, the documents were systematized and provided with metadata. Further, on the basis of the theoretical framework and research questions, an initial version of the codebook was developed, including definitions of categories, inclusion and exclusion criteria, and rules for resolving potentially ambiguous cases. After pre-coding, the definitions of individual categories and subcategories were refined to make them more meaningful. At the main stage, each document was analyzed in its entirety, and the relevant nouns were coded according to their contextual significance. The keywords were purely auxiliary in searching for potentially relevant snippets and did not constitute an independent basis for assigning a code. Multiple encoding was allowed when a single denomination contained several distinct analytical components. For example, a provision on developing an international transport corridor to increase mutual trade could be included under the energy and transport categories, alongside economic cooperation. However, the repetition of a single substantive provision by means of several synonymous expressions within a single entity was not considered as several separate code entries. To ensure transparency in the analytical procedure, research memos and a journal of coding decisions were conducted, in which ambiguous cases were recorded, boundaries between categories were clarified, and encoding rules adopted.

Reliability of the encoding. A cross-coded validation procedure was used to evaluate the code system's reproducibility. The two researchers independently applied a single codebook to the general body of the documents. After independent coding, the discrepancies were compared with operational category definitions and discussed until an agreed solution was reached. The clarifications that arose during this procedure were incorporated into the final version of the codebook and used in subsequent analysis of the body. Inter-coder consistency was assessed using Cohen's kappa coefficient, which allows for the probability of an accidental overlap between two coders. The final value was $\kappa = 0.81$, indicating a high degree of coding consistency. The remaining discrepancies were resolved through a conciliatory discussion based on code definitions, inclusion and exclusion criteria, and the context of the snippet being analyzed.

After quality coding was completed, the data were exported from MAXQDA and converted into a structured analytical matrix. For each of the 41 documents, the number of code entries in six parent subject categories was calculated. In the next step, indicators were aggregated by time periods and institutional levels. Quantitative analysis was carried out in three directions. First, the general thematic structure of the corpus for 2015–2025 was determined, which made it possible to establish the relative representation of six directions in the official discourse of the SCO. Second, the periods 2015–2019 and 2020–2025 were compared to identify longitudinal changes in thematic priorities. Third, a comparison was made between the documents of the Council of Heads of State and the Council of Heads of Government/Prime Ministers to identify the institutional differentiation of official discourse. Because the documents

differed substantially in volume and in the total number of coded reference units, absolute frequencies were analyzed alongside relative indices. For each document, the share of each parent category in the total number of code entries was calculated. This approach allowed for the comparison of document thematic profiles regardless of volume differences. The distribution of the six parent codes at the level of individual documents was also presented as a Code Matrix (Figure 1). In contrast to visualizing the absolute number of code entries, the matrix was normalized at the level of each document: the cell intensity reflected the percentage of the relevant thematic category in the document's total number of code entries. The numeric value in each row denotes the dominant category of topics. This visualization made it possible to simultaneously present the inter-document differences and the change in thematic structure of official discourse throughout the period under study.

Figure 1. Code matrix of thematic profiles in SCO official documents, 2015–2025



Source: compiled by the authors

Thus, absolute frequencies were used to characterize the total volume of thematic references, while relative figures were used for comparative analysis of the structure of discourse. The frequency of coding has been interpreted as an indicator of the relative importance of the relevant thematic area in the discourse and was not seen as a direct indication of the intensity of policy implementation. The approach taken examines formal institutional discourse and does not directly measure the actual results of regional integration. Official documents indicate which areas of collaboration are articulated, legitimized, and prioritized by the organization, but do not, in themselves, determine the extent to which the initiatives are implemented. Therefore, the results were interpreted as a characterization of the structure, dynamics, and institutional differentiation of the official discourse of the SCO, rather than as a direct assessment of the organization's effectiveness or the actual depth of regional integration.

4. FINDINGS

As a result of the content analysis, a structured dataset was compiled for 41 official documents of the Shanghai Cooperation Organization from 2015-2025. For each document, the frequency of code entries was recorded in six analytical categories: integration, economic cooperation, political coordination, energy and transport, humanitarian cooperation, and security. The analysis was carried out sequentially at three levels: first, the overall thematic structure of the building was determined; then its dynamics between the periods 2015-2019 and 2020-2025 were evaluated; and finally, the thematic profiles of CHS and PM documents were compared. Additionally, the variability of the thematic structure at the level of individual documents was taken into

account. The first stage of analysis aimed to determine the overall structure of thematic priorities in official SCO documents over the entire period under investigation. In 41 documents, 9,477 code entries were recorded in six parent categories. However, their distribution was uneven, indicating that some areas of collaboration were represented at different levels in the organization's official discourse. The source matrix contains values for all documents D01-D41 and allows them to be aggregated into each of the six thematic categories (Table 1).

Table 1. Overall distribution of thematic categories in SCO official documents, 2015–2025

Thematic category	Coded segments, n	Share of total coded segments, %
Economic cooperation	2,450	25.9
Security	1,720	18.1
Integration	1,492	15.7
Political coordination	1,486	15.7
Energy & transport	1,238	13.1
Humanitarian cooperation	1,091	11.5
Total	9,477	100.0

Source: compiled by the authors

As Table 1 shows, the most represented category was economic cooperation, which accounted for 2,450 code entries, or 25.9% of the total array. Thus, approximately one in four code entries in the investigated corpus concerned economic issues. The economic category included provisions on trade, investment, business interactions, the digital economy, production cooperation, and supply chains. The second position was security - 1,720 code entries (18.1%). Although its combined share was 7.8 percentage points below economic cooperation, security remained one of the highest-profile areas on the official agenda. However, the distribution of this category across individual documents was particularly heterogeneous: the corpus included both complex declarations with a relatively balanced thematic structure and specialized documents in which security was the main focus of all code entries. For example, in D02 security accounted for 60 of 90 code entries, in D03 it was 48 out of 70, and in D10 it was 65 out of 83. The categories of integration and political coordination had almost identical aggregate representation: 1,492 (15.7%) and 1,486 (15.7%) code entries, respectively. This is a significant result regarding the body's structure: the integrative component of official discourse was not limited to economic or security issues but formed an independent platform of utterances alongside political coordination. However, in accordance with the adopted coding procedure, functional collaboration was not automatically classified as Integration; this code was applied only if there was separate regional, institutional, or normative-integration content. Energy and transport accounted for a slightly smaller share - 1,238 code entries (13.1%) and humanitarian cooperation - 1,091 (11.5%). However, their lower share in the total does not mean that these directions are peripheral throughout the period under study. Already, the primary analysis of the matrix shows a significant concentration of these categories in individual papers, especially in the later part of the

corpus. For example, in the 2025 documents, there are 89 code entries for Energy & transport and 90-93 for Humanitarian cooperation, which are significantly higher than the corresponding figures for most documents in the first half of the period under study.

The visual structure of the Code Matrix (Figure 1) confirms that the overall distribution of codes comprised substantially different document profiles. In the first part of the study period, documents with a strong focus on security stand out particularly clearly, while several PM-level documents are characterized by a high level of economic coding intensity. For example, in D05, D08, D11 and D14, economic cooperation amounted to 65, 62, 68 and 75 code entries respectively. In the latter part of the matrix, the visual profile becomes more heterogeneous: alongside the preservation of economic and security issues, the intensity of coding energy-transport and humanitarian directions in a number of documents increases. Particularly noticeable is the variability of the 2025 documents, where high values are already distributed among several thematic categories rather than concentrated exclusively in one.

The second stage of analysis aimed to identify changes in the thematic structure of the SCO's official discourse over time. For this, the corpus was divided into two analytical periods: 2015-2019 (15 documents) and 2020-2025 (26 documents). Such a comparison allows one to determine whether the relative positions of the six thematic areas have changed within an organization's formal agenda. There were 2,095 code entries in the first period documents, while 7,382 in the second period documents. The direct comparison of these absolute values is not, in itself, indicative, since the second period includes more documents and some later documents are characterized by substantially more coding. Therefore, the main inter-period comparison was made on the relative structure of code entries within each period.

Table 2. Distribution of thematic categories in SCO official documents by period

Thematic category	2015-2019	2015-2019	2020-2025	2020-2025	Change, pp
	N	%	N	%	
Integration	354	16.9	1,138	15.4	-1.5
Economic cooperation	534	25.5	1,916	26.0	+0.5
Political coordination	362	17.3	1,124	15.2	-2.1
Energy&Transport	189	9.0	1,049	14.2	+5.2
Humanitarian cooperation	161	7.7	930	12.6	+4.9
Security	495	23.6	1,225	16.6	-7.0
Total	2,095	100.0	7,382	100.0	—

Source: compiled by the authors

The results of Table 2 show that changing the SCO's official discourse between two periods did not amount to a simple transition from security to economic cooperation. Economic topics were the most-represented category in 2015-2019, accounting for

25.5% of all code entries. In 2020-2025. Its share reached 26.0%, an increase of only 0.5 percentage points. Therefore, the main change was not the growth of the economic component as such, but the redistribution of the relative representation of other areas on the official agenda. The largest reduction occurred in the Security category, with its share falling from 23.6% in 2015-2019 to 16.6% in 2020-2025. is 7.0 percentage points. In the first period, security was almost comparable to economic cooperation in terms of overall representation: the difference between them was only 1.9 percentage points. In the second period, this gap increased to 9.4 percentage points. However, the decline in the relative safety share has not been accompanied by its disappearance from the official agenda. In absolute terms, the number of relevant code entries increased from 495 to 1,225 due to the expansion of the case and the overall coding volume. Moreover, certain documents from the second period maintained a clearly expressed security orientation. For example, in D25, security accounted for 65 out of 109 code entries, and in D29, security accounted for 95 out of 390. Therefore, the result is more correctly interpreted as a reduction in the relative weight of security within an expanding thematic framework of discourse, rather than a weakening or crowding out of the security agenda. The most notable increase in relative representation was found for Energy & transport. The share of this category rose from 9.0% to 14.2%, a 5.2 percentage-point increase. In the first period, energy and transport issues ranked second-to-last among six categories; in the second, their relative representation was close to that of indicators of integration and policy coordination. At the documentary level, this trend is particularly noticeable in the 2022-2025 materials, where separate documents contain 55, 79, 88, and 89 code entries in this category.

The next stage of the analysis examined whether the thematic composition of official SCO discourse varied across institutional levels. The corpus comprised 32 documents issued at the CHS level and 9 documents associated with the PM. Because the documents differed substantially in length and in the total number of coded segments, comparisons based solely on absolute frequencies could disproportionately reflect document size rather than thematic emphasis. Accordingly, the six thematic categories were normalized at the document level by calculating the percentage of coded segments assigned to each category, relative to the total number of coded segments in each document. Given the unequal group sizes and the distributional characteristics of the document-level proportions, differences between CHS and PM documents were assessed using the Mann–Whitney U test. Rank-biserial correlation ((r_{rb})) was additionally calculated to assess the magnitude of the observed differences. The results are presented in Table 3.

Table 3. Comparison of document-level thematic salience

Thematic category	CHS, Median (IQR), %	PM, Median (IQR), %	Mann–Whitney U	p	$ r_{rb} $
Integration	13.58 (9.78–21.15)	12.68 (11.67–13.66)	145.0	.987	.01
Economic cooperation	17.98 (15.94–31.58)	41.40 (39.58–42.03)	70.0	.021	.51
Political coordination	15.43 (12.11–18.17)	14.91 (14.49–15.49)	145.0	.987	.01
Energy and transport	9.41 (5.08–15.28)	16.43 (14.08–16.76)	68.0	.017	.53

Humanitarian cooperation	8.23 (3.94–16.21)	8.38 (6.37–9.39)	134.0	.765	.07
Security	20.77 (7.91–28.10)	7.82 (7.64–8.40)	216.0	.024	.50

Source: compiled by the authors

The analysis identified statistically significant institutional differences in three of the six thematic dimensions: economic cooperation, energy and transport, and security. Importantly, these differences were accompanied by rank-biserial correlations of approximately .50 or greater, indicating that the observed contrasts were substantively pronounced rather than being attributable solely to statistical significance. The strongest institutional contrast concerned economic cooperation. Its median within-document share was 41.40% (IQR = 39.58–42.03) among PM documents, compared with 17.98% (IQR = 15.94–31.58) among CHS documents. The difference was statistically significant (($U=70.0$), ($p=.021$), ($|r_{\text{rb}}|=.51$)). The narrow interquartile range observed for PM documents is also noteworthy: economic themes accounted for approximately two-fifths of coded content across the central 50% of documents in this group. Economic cooperation therefore constituted a comparatively consistent component of the PM-level agenda rather than being driven by a small number of exceptionally economy-focused documents. A similar institutional pattern was observed for energy and transport. The median share of this category was 16.43% (IQR = 14.08–16.76) in PM documents and 9.41% (IQR = 5.08–15.28) in CHS documents. This difference was statistically significant (($U=68.0$), ($p=.017$)) and was associated with an effect size of ($|r_{\text{rb}}|=.53$). Thus, the greater prominence of energy- and transport-related content at the PM level remained evident after differences in overall coding volume across documents had been taken into account. An inverse pattern emerged for security. Security-related content accounted for a median of 20.77% (IQR = 7.91–28.10) of coded segments in CHS documents, compared with only 7.82% (IQR = 7.64–8.40) in PM documents. The difference was statistically significant (($U=216.0$), ($p=.024$), ($|r_{\text{rb}}|=.50$)). The wider interquartile range among CHS documents further indicates substantial variation in the salience of security within this institutional group, consistent with the presence of both broad summit declarations and documents specifically devoted to security-related issues. By contrast, no statistically significant institutional differences were found for integration, political coordination, or humanitarian cooperation. Integration accounted for a median of 13.58% of coded segments in CHS documents and 12.68% in PM documents (($U=145.0$), ($p=.987$), ($|r_{\text{rb}}|=.01$)). Political coordination was similarly distributed across the two groups, with median shares of 15.43% and 14.91%, respectively (($U=145.0$), ($p=.987$), ($|r_{\text{rb}}|=.01$)). Humanitarian cooperation also showed little institutional differentiation: its median share was 8.23% in CHS documents and 8.38% in PM documents (($U=134.0$), ($p=.765$), ($|r_{\text{rb}}|=.07$)). Taken together, the findings reveal a pattern of thematic diversification combined with selective institutional specialization in SCO official discourse. Economic cooperation remained the most prominent thematic domain across the 2015–2025 corpus, while the later period was characterized by a lower relative share of security-related content and greater representation of energy and transport and humanitarian cooperation. At the institutional level, the differences were concentrated in specific functional domains rather than extending across the entire thematic structure: PM documents showed significantly greater salience of economic cooperation and energy and transport, whereas security was significantly more prominent in CHS documents. By contrast, integration, political coordination, and humanitarian cooperation did not

differ significantly between the two institutional levels. The results indicate that the evolution of SCO discourse is better characterized by an expansion and differentiation of its functional agenda than by a straightforward replacement of security priorities with economic ones.

5. DISCUSSION

The findings provide a more differentiated account of the evolution of the Shanghai Cooperation Organization than interpretations that frame the SCO primarily as either a security organization or an emerging economic integration project. Across the 2015–2025 corpus, economic cooperation constituted the largest thematic domain, while security remained a major but increasingly less dominant component of the overall discourse. At the same time, the later period was marked by the growing relative salience of energy and transport and humanitarian cooperation. This combination suggests that the principal transformation of SCO discourse has not been a linear transition from a security agenda to an economic one. Rather, the organization's official discourse has undergone functional diversification, in which a historically important security agenda has been retained while the range of policy domains encompassed by regional cooperation has expanded. This finding both supports and qualifies previous interpretations of the SCO's institutional development. Earlier scholarship has emphasized the organization's security foundations and its role in coordinating responses to terrorism, extremism, separatism, and other transnational threats (Wang & Kong, 2019; Cooley, 2021; Pantucci, 2021; Yuan, 2023). The present analysis confirms that security remains structurally important within SCO discourse. However, its declining relative share in the later period indicates that security no longer defines the thematic architecture of the organization to the same extent as it did in the earlier part of the corpus. Importantly, this should not be interpreted as evidence of a retreat from security cooperation. Security-related coded content remained substantial, and several later documents continued to display a pronounced security orientation. What changed was its position within an increasingly multidimensional agenda. In this sense, the findings are more consistent with institutional expansion than with policy substitution.

The growing prominence of energy, transport, and humanitarian cooperation is particularly important in this respect. These domains broaden the functional scope of regional cooperation beyond the security–economy dichotomy that has frequently structured analyses of the SCO. Transport connectivity, logistics, energy cooperation, digital transformation, scientific exchange, public health, environmental issues, and related forms of interaction increasingly appear alongside the organization's established security and economic priorities. Such diversification is consistent with studies describing the SCO's gradual evolution from a relatively narrow security-oriented grouping towards a broader framework of regional governance (Pradhan & Mohanty, 2021; Proń, 2023; Seiwert, 2025). The longitudinal evidence presented here nevertheless adds an important qualification: diversification does not necessarily imply deeper integration. An organization may broaden the number of policy areas addressed in its official agenda without simultaneously developing stronger supranational institutions or binding mechanisms of policy harmonization. This distinction is central to understanding the form of regionalism represented by the SCO. Classical approaches to regional integration have often associated institutional development with increasing delegation of authority, policy harmonization, market integration, or the creation of

supranational governance structures. Such criteria provide only a partial explanation of the SCO. The organization has instead maintained consensus-based decision-making, strong commitments to sovereignty and non-interference, and relatively limited supranational authority. The findings therefore support interpretations of the SCO as a form of flexible or sovereignty-preserving regionalism rather than an incomplete version of a European-style integration project (Allison, 2008; Dadabaev, 2014; Acharya, 2016; Rauf, 2020). From this perspective, the absence of movement towards deep supranational integration should not automatically be treated as evidence of institutional failure. It may instead reflect a different institutional logic in which cooperation is selectively expanded across functional domains, while member states retain substantial control over the depth and form of their commitments.

The results concerning the explicit integration category reinforce this interpretation. Integration-related discourse remained visible throughout the corpus but did not become overwhelmingly dominant despite the expansion of economic, infrastructural, and humanitarian themes. This distinction is analytically significant because the coding framework deliberately separated explicit regional and institutional integration from more general references to cooperation. Consequently, the expansion of functional cooperation cannot automatically be equated with a corresponding increase in the rhetoric of integration. The SCO appears to achieve regional convergence primarily by accumulating sector-specific forms of coordination rather than by an explicit commitment to progressively deeper institutional integration. In this sense, regionalization within the SCO may proceed through what can be described as selective functional institutionalization: cooperation becomes denser across particular policy fields while the political principles governing the organization continue to protect national autonomy. The institutional comparison between the Council of Heads of State and the Council of Heads of Government further develops this argument. The substantially greater salience of security in CHS documents, combined with the stronger emphasis on economic cooperation and energy and transport at the PM level, indicates a degree of functional specialization within the SCO's institutional architecture. The organization's thematic diversity is therefore not distributed randomly across its institutional bodies. The heads-of-state level is more strongly associated with strategic and security-related agenda setting, whereas the governmental level gives greater prominence to the operational and functional dimensions of economic and infrastructural cooperation. At the same time, the absence of substantial institutional differences in integration and political coordination suggests that this specialization is selective rather than constituting a division into separate institutional agendas.

This finding has implications for how the SCO itself should be conceptualized. Rather than operating through a single homogeneous integration agenda, the organization appears to accommodate different layers of regional cooperation within the same institutional framework. Strategic-security coordination and functional-economic cooperation coexist but are articulated with different intensity at different decision-making levels. Such an arrangement may contribute to the SCO's institutional flexibility: member states are not required to agree on a uniform trajectory of deep integration in order to cooperate intensively in selected policy domains. Institutional differentiation can therefore serve as a mechanism through which a heterogeneous membership sustains cooperation despite differences in national priorities, economic interests, and geopolitical orientations. For Central Asia, this flexibility is particularly consequential. Kazakhstan, Kyrgyzstan, Tajikistan, and Uzbekistan operate within an institutional environment that includes China, Russia, and an expanding group of other

Eurasian actors. Existing research has increasingly challenged interpretations that reduce Central Asian regionalism to competition between external powers, emphasizing instead the agency of secondary states in navigating overlapping regional institutions and using them to widen their foreign-policy options (Dadabaev, 2014; Nasibov & Gawrich, 2025). The thematic structure identified in this study is compatible with such an interpretation. A multidimensional SCO agenda creates several institutional entry points through which Central Asian states can articulate interests related to security, trade, connectivity, energy, diplomatic coordination, and humanitarian cooperation without committing themselves to a single supranational integration framework. This does not mean that the discourse analyzed here demonstrates equivalent influence among SCO members, nor can document-level content establish which states were responsible for particular agenda shifts. The present evidence therefore does not support a causal claim that Central Asian states themselves produced the observed thematic diversification. It does, however, show that the institutional discourse within which these states operate has become increasingly multidimensional. This distinction is important because it avoids portraying Central Asian agency as an assumption while still recognizing the institutional opportunities created by a broader functional agenda. Future actor-level research could examine the extent to which particular member states shape specific thematic priorities and whether national preferences are subsequently incorporated into collective SCO documents.

The findings also contribute to the constructivist interpretation of SCO regionalism. Official declarations, statements, and communiqués do not merely enumerate areas of cooperation; they also help define which forms of regional interaction are presented as legitimate, desirable, and institutionally appropriate. The persistence of integration and political-coordination themes alongside the expansion of functional policy areas indicates that SCO regionalism is constructed through both material cooperation and a recurring normative vocabulary. In this respect, principles associated with the “Shanghai Spirit”, including sovereignty, equality, mutual trust, consensus, and non-interference, provide a discursive framework capable of accommodating cooperation without requiring supranational convergence (Karrar, 2017; Xue & Makengo, 2021). The coexistence of these principles with an increasingly diversified functional agenda helps explain how institutional expansion can occur without a corresponding abandonment of sovereignty-centered regionalism. The results suggest that the SCO is best understood neither as a conventional security alliance nor as an emerging supranational integration organization. Instead, it operates as a hybrid, functionally differentiated regional platform in which security coordination, economic cooperation, connectivity, humanitarian interaction, and broader integration narratives coexist within a sovereignty-preserving institutional framework. Its evolution between 2015 and 2025 is therefore characterized less by movement along a linear continuum from “low” to “high” integration than by the widening of the domains in which regional cooperation is articulated. This pattern contributes to the broader literature on comparative and non-Western regionalism by demonstrating that institutional development may take the form of expanding functional density and differentiated cooperation without necessarily producing supranational authority or uniform policy integration.

6. CONCLUSION

This study examined how regional integration in Central Asia is constructed and prioritized in the official discourse of the Shanghai Cooperation Organization and

how the relative salience of its principal areas of cooperation evolved between 2015 and 2025. Drawing on a longitudinal content analysis of 41 official SCO documents, the study combined qualitative coding with quantitative analysis of six thematic dimensions: integration, economic cooperation, political coordination, energy and transport, humanitarian cooperation, and security. By examining both temporal change and institutional differentiation between the Council of Heads of State and the Council of Heads of Government/Prime Ministers, the analysis provides a systematic account of how the SCO's formal regional agenda has developed over the past decade. The findings demonstrate that the evolution of SCO discourse cannot be adequately described as a straightforward transition from a security-oriented organization towards an economically oriented one. Economic cooperation remained the largest thematic domain across the corpus, while security continued to occupy an important position. The principal longitudinal change was instead the diversification of the organization's agenda, particularly through the increasing relative prominence of energy, transport, and humanitarian cooperation. Security consequently became less dominant within the overall thematic structure without disappearing from the SCO's institutional agenda. The findings therefore point to an expansion of the functional scope of cooperation rather than the replacement of one dominant policy domain by another. The institutional comparison further demonstrates that this diversification is accompanied by functional differentiation within the SCO. Documents produced at the governmental level placed greater emphasis on economic cooperation and energy and transport, whereas those at the heads-of-state level were more strongly associated with security. At the same time, integration and political coordination displayed broadly comparable salience across the two institutional settings. The SCO's institutional architecture therefore appears to combine a common overarching discourse of regional cooperation with differentiated policy priorities across its principal decision-making levels.

These findings have broader implications for the conceptualization of regional integration beyond supranational models. The SCO does not exhibit a linear trajectory towards the delegation of sovereignty, binding policy harmonization, or supranational governance. Instead, its institutional development is characterized by the expansion of cooperation across multiple functional domains while maintaining consensus-based decision-making and strong commitments to sovereignty and non-interference. The evidence therefore supports an interpretation of the SCO as a form of flexible, functionally differentiated, and sovereignty-preserving regionalism, in which greater density of regional cooperation does not necessarily entail deeper supranational integration. For the Central Asian states, this institutional configuration is particularly significant. The SCO provides Kazakhstan, Kyrgyzstan, Tajikistan, and Uzbekistan with a multilateral framework in which security, economic development, transport connectivity, energy cooperation, political coordination, and humanitarian interaction can be pursued simultaneously without requiring participation in a uniform model of deep integration. In this respect, the SCO should not be understood exclusively in terms of the strategic interaction between China and Russia. Its multidimensional institutional framework also constitutes a regional arena within which Central Asian states can articulate and coordinate their own priorities while maintaining substantial national autonomy. The study nevertheless has several limitations. First, it analyses official institutional discourse rather than policy implementation; the salience of a thematic category in SCO documents should therefore not be interpreted as direct evidence of the effectiveness or depth of cooperation in that area. Second, the corpus is restricted to selected official documents produced at two principal institutional levels and does not capture the full range of SCO bodies, national policy documents,

or informal negotiations. Third, document-level content analysis cannot determine the relative contribution of individual member states to changes in the collective agenda. Future research could therefore connect official SCO discourse with implementation indicators, examine actor-specific contributions to agenda formation, extend the analysis to additional institutional bodies, and investigate how the organization's continuing enlargement affects the balance between functional cooperation and institutional cohesion. The study shows that the SCO represents a form of regional institutional development in which breadth of cooperation may increase without a corresponding transfer of sovereignty or movement towards supranational integration. Its evolution from 2015 to 2025 is best understood as a process of functional diversification and selective institutionalization: security remains important, economic cooperation provides a persistent core, and additional domains of connectivity and humanitarian interaction have become increasingly embedded in the organization's formal discourse. This pattern contributes to the wider debate on comparative and non-Western regionalism by demonstrating that regional integration can develop through flexible, differentiated, and sovereignty-preserving forms of cooperation rather than through a single universal trajectory towards supranational governance.

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CONFLICT OF INTEREST

The author declares no conflict of interest.

AUTHORS' CONTRIBUTIONS

AB: development of the research concept, formulation of the theoretical framework, review and analysis of the scientific literature, compilation of the empirical corpus, organization and implementation of the content analysis, data processing, interpretation of the results, and drafting of the main manuscript; AK: methodological support of the study, participation in the coding procedure, verification of coding reliability, interpretation of the results, and scientific editing of the manuscript; ZS: contribution to the theoretical framework, review and analysis of the scientific literature, interpretation and validation of the research findings, and participation in formulating the conclusions; CP: contribution to the conceptual and theoretical framework. All authors have read and approved the final version of the manuscript.

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