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“Securitisation and Human Rights Discourse: Violations of Freedom of Expression during Covid-19 in Central Asia”

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SECURITISATION AND HUMAN RIGHTS DISCOURSE: VIOLATIONS OF FREEDOM OF EXPRESSION DURING COVID-19 IN CENTRAL ASIA

Abstract

The purpose of the research is to analyze the legal criteria for constitutionally permissible methods of restricting freedom of expression when combating a pandemic in Central Asian countries. Central Asian states continue to control the flow of information as well as conceal the scale of damage caused by the pandemic, even at such difficult times. Author argues that states have used the pandemic as an excuse to suppress public debate and criticism and to control the media using securitisation discourse. Therefore, this thesis relies on the framework of securitization to understand how the discourse is constructed to legitimise the emergency measures taken under the pretext of stopping the spread of "false" information about Covid-19. An exploratory approach is used as there is limited information on the topic. The author hopes to contribute to the existing literature on securitisation as well as regional studies in the context of the pandemic. The study shows that Covid-19 and the associated state of emergency have been used to divert attention from passing controversial laws and using emergency measures that would be unacceptable in normal times. Furthermore, study explains that people accept the government's rhetoric without suspicion because of the corollary of the historical memory of the Soviet Union, its legacy and its influence on people's perceptions of power. As a result, the laws passed have led to regulations restricting freedom of speech and expression, and freedom of the press becoming excessive and going beyond what is permissible. The author claims that the main problem is that these laws have no time limit and will have a long-term effect. In essence, the research and its method revealed the hidden aspects of political discourse - identifying opportunities for abuse of power.

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1. Introduction

"Emergency powers should not be a weapon government can wield to quash dissent, control the population, and even perpetuate their time in power. They should be used to cope effectively with the pandemic – nothing more, nothing less."

Michelle Bachelet, Geneva, (UNHR, 27 April 2020)

The worldwide outbreak of coronavirus (Covid-19) has triggered an unprecedented chain of events with international, regional, and national implications for public policy. This is not the first time humanity has faced such pandemics, as a series of coronaviruses (SARS-CoV) has been detected before (World Bank, 2020). Therefore, Covid-19 is a phenomenon that has been introduced previously in the international system, which is increasingly affected by the emergence and re-emergence of viruses or other diseases. In modern times, however, the pandemic reached such proportions since the Influenza epidemic of 1918-19 (World Bank, 2020), spreading rapidly around the world and causing many problems, not only humanitarian but also economic and political (Gleason et al., 2020). The whole world has had to impose restrictive emergency measures against the virus. At the time of writing (January 2023), there were approximately 670 million cases of the disease and over 6.5 million deaths (Worldometer). It remains to be seen when the virus will subside as many countries have lifted restrictions, and people are still getting sick.

The pandemic has posed serious challenges to all countries, but our attention in this paper is focused on Central Asia, where the virus has raised a new social dilemma and exacerbated some long-standing problems that existed in the republics even before Covid-19 appeared. This situation has compromised existing political systems, creating an unprecedentedly critical environment for decision-making by heads of state, and has also revealed, along with the general nature of actions, significant differences in the measures taken (Akhunov, 2020; Jones et al., 2021; Gleason et al., 2020; Lenon et al., 2021). While Kazakhstan, Uzbekistan, and Kyrgyzstan followed a model of broad public education, attempting to combine strong state measures with private outreach to citizens, the efforts of the authorities in Tajikistan and Turkmenistan have mainly included measures to combat coronavirus in the information space (Akhunov, 2020; Ibbotson, 2020; Gleason et al., 2020; Jones et al., 2021). Noteworthy in Central Asia, already in pre-Covid times, the activities and movements of the population were controlled and restricted (O'Casey, 2022). Barcelo et al. (2022) argue that "*governments with incentives at their core to oppress their citizens can take*

advantage of the global health crisis to increase repressive measures to control dissidents at home." Is this the case in Central Asia? That is what we will try to find out.

This paper argues that the pandemic is an opportunity for governments to strengthen law enforcement and restrict public assemblies to suppress opposition activity and protest. Moreover, in Central Asia, legislative and decision-making processes are insufficiently transparent, which is exacerbated in the current context (Akhunov, 2020; Ibbotson, 2020). Meanwhile, new opportunities and means to combat Covid-19 threaten to provide governments with vast tools to monitor and deter civic action and dissent beyond necessity (Ibbotson, 2020). In some cases, Covid-19 and the associated state of emergency have been used to divert attention away from passing controversial laws or as an excuse for governments to take action without necessary approvals (O'Casey, 2022). The focus of this paper will be on one of these laws, the dissemination of knowingly false information, which has been adopted by Central Asian countries, except Turkmenistan, which is already notable for its rigid laws and high level of authoritarianism. Already at the beginning of the pandemic it was obvious that Covid-19 restrictions would be abused as a means of suppressing political opposition (O'Casey, 2022). In support of this claim, at least 300 people have been detained under this law throughout Central Asia, including most journalists and opposition activists (O'Casey, 2022).

There is a plethora of literature that describes the response of Central Asian governments to the global health crisis, mainly how and why this response differs between countries in the region. Also, a vast amount of literature is devoted to the economic and health consequences in the region's countries. This paper is concerned with the implications in political terms, namely, what determines the policy response of CA countries and how they are inconsistent with the claims in the policy response. A large number of policies have been adopted, and to clearly understand their trends and the possible consequences, this paper focuses on one of them. This analysis may help to understand why such policy changes are occurring and what can be expected from such decisions by answering the main research questions:

1) **Has a securitised approach been adopted in the measures against Covid-19 in Central Asia? (Related to freedom of expression and access to information)**
2) **What laws regulating freedom of expression and access to information have been adopted/exist in Central Asian states in the context of the pandemic?**
3) **Do these measures constitute excessive and beyond to what is permissible?**

Most human rights treaties are known to include emergency provisions applicable during the initial crisis response period, and this article seeks to illustrate that the vagueness of these provisions, and the lack of time limits on their use, is problematic, as they can create permanent compromises imposed in the name of security (Gozdecka, 2021). Building on this, securitisation theory is used, a discursive twist on highlighting threats to public health security. The paper shows how, according to securitisation theory, some solutions used in pandemic control can be overly restrictive and create long-term or permanent rights concerns (Gozdecka, 2021). For example, we can attribute continued restrictions on publications and speech, blocking of online publications and continued tracking of activists to restrictions that have led to the infringement of rights, while some restrictions, such as travel restrictions and quarantine, have had a short-term impact (Gozdecka, 2021).

This paper examines recent events with several aims in mind. In order to illustrate how securitisation of health crisis challenges freedoms, this article undertakes a pre-pandemic analysis of the rights to freedom of speech and expression to argue that Covid-19 challenges legal regimes in new ways and reinforces earlier securitisation trends. Secondly, the research examines the provisions relating to emergencies in order to study measures adopted to combat Covid-19 that are consistent with human rights treaties and those that contradict them, causing lasting effects on certain rights. It aims to show that the securitisation during the pandemic of this magnitude may limit some rights and justify restrictions in the long term, as well as create uncertainty about the adequacy and rationale of restrictions (Gozdecka, 2021).

The next chapter discusses the research approach and design used in the paper. Chapter 3, Theoretical literature review, explains securitisation theory, its basics and conceptualisation, drawing mainly on the existing theoretical framework of security studies. Also, the relationship between securitisation and the health crisis and its applicability to the Covid-19 situation in Central Asia is reviewed. Chapter 4, Literature Review, reviews the scientific literature on the Central Asian response to the coronavirus. It explores what the scientific community has to say about freedoms during the Covid-19 pandemic in Central Asian countries. In particular, it covers the first two years of the pandemic and the pre-pandemic state of freedom of expression, publication, speech, and access to information. Some contextual and historical background is provided. The analysis and case studies of the countries in the region are presented in Chapter 5.

2. Methodology

The main objective of this research is to examine how political discourse is constructed to legitimise extraordinary actions taken to suppress the dissemination of "false" information about Covid-19 in the countries of Central Asia within the framework of securitisation. Despite the known fact that a deviation from legal norms is a common practice in these countries (O'Casey, 2022), the author believes that Covid-19 has led to stricter laws and has prompted an even greater consolidation of power over the people through threat construction. The problem is that empirical research in security studies shows that only a few discuss the methodology (Buzan et al., 1998). Thus, scholars still need to formulate a coherent methodology despite a vigorous debate on theory building and conceptualisation (discussed in Chapter 3). Hence, according to Buzan, Wæver, and de Wilde (1998), questions related to securitisation acts should be answered through discourse analysis and political studies. Discourse analysis is the most applicable as it reveals when, how, and by whom something is identified as a security threat. Therefore, this thesis employs discourse analysis and secondary/desk research to investigate existing data and official statements that justify excessive laws on freedom of expression.

2.1. Research Approach.

This study uses an exploratory research approach in order to better understand the topic under study. This approach does not aim to create convincing evidence but to broaden the understanding of the subject matter (Soest and Stroh, 2018). As such, this research seeks to explain aspects of the discourses under study and to establish an understanding of the "what" and "how" (Soest and Stroh, 2018). Exploratory or descriptive studies are usually used when information and research conducted in the field is limited (Soest and Stroh, 2018), like in the case of Central Asia. Thus, using this research approach, the author is prepared that access to information may be difficult or limited. Accordingly, this type of research requires in-depth study, especially if it has not been done before, to discover new ideas and insights on the topic (Swedberg, 2020). In the case of the Central Asian countries, there is not yet a sufficient number of studies on the impact of Covid-19 on politics and legislation.

Considering the restrictions of Covid-19, the secondary/desc research is the most suitable for this paper. Indeed, primary research would have provided an exclusive expert opinion on the topic and helped in learning the views of Central Asian people. However, in a study of this scale (in 5 countries at once), it was almost impossible to do so in the context of the pandemic. Especially since many Central Asian countries have laws prohibiting the spread of false

information about the pandemic, and some forbid any mention of Covid-19 (Ibbotson, 2020). As a result, even with the method used in this paper, there were difficulties accessing information from independent media and organisations and even from official government websites. Still, in this study, even the lack of access to information, documents, and reports is a meaningful outcome worth writing about. Given these difficulties, the author considers discourse analysis and critical discourse analysis (CDA) suitable for achieving the research objective. CDA will be used to review constitutions, official statements, and articles on the justifications for restrictions on freedom of expression. The following passages discuss the concepts and main benefits of using discourse analysis and CDA methodology.

Discourses presented in this research will be analysed through the theoretical framework of securitisation. The securitisation concept bases its methodology on speech acts and proposes a methodological procedure for observing and assessing whether speech acts meet the securitisation criteria (Buzan et al., 1998). Since securitisation was initially developed as a constructivist operational method for scrutinising discourses, *"discourse analysis is the most common approach when dealing with securitization"* (Buzan et al., 1998). In this particular study, discourse analysis is beneficial in light of securitisation. Discourse analysis is a method that helps to explain the development of rhetoric that influences threat perceptions (Buzan et al., 1998).

2.2. The Concepts of Discourse Analysis and Critical Discourse Analysis

According to Teun van Dijk (2006), *"discourse is speech flow, language in its constant flux, incorporating the diversity of historical eras and individual and social characteristics."* Discourse reflects the mentality and culture, including national, universal, and individual (van Dijk, 2006). In contemporary social sciences, the term "discourse" is considered one of the most popular and widely used terms. It is used in different paradigms of knowledge and meanings, often referring to different concepts (van Dijk, 2006). According to Teun van Dijk (2008), the most important is the context of the discourse. Thus, understanding discourse means understanding the context of the speech/text.

Zellig S. Harris (1952) introduced discourse analysis as a method of studying the movement of information in discourse. Discourse analysis is an analytical technique for interpreting texts or people's statements in specific socio-political circumstances and historical-cultural contexts (van Dijk, 2008; Wodak & Meyer, 2001). Therefore, discourse analysis comes

from many disciplinary backgrounds - sociology, socio-psychology, anthropology, linguistics and philosophy, communication studies, and literature (Wodak & Meyer, 2001).

In turn, "*CDA is discourse analytical research that primarily studies the way social-power abuse and inequality are enacted, reproduced, legitimated, and resisted by text and talks in the social and political context*" (van Dijk, 2015). In other words, CDA aims to investigate social inequality critically - how it is expressed and legitimised through its use in discourse (language and text) (Wodak, Ruth & Meyer, 2001; Wodak & Meyer, 2001). Thus, the critical analysis of discourse requires a description of both the social processes and structures that produce the text and the processes within which the meanings of the text are produced (Wodak & Meyer, 2001). Therefore, three concepts are needed in CDA: the concept of power, the concept of history, and the concept of ideology (Wodak & Meyer, 2001). What we need for this research is an understanding of the concepts of power and history (Wodak & Meyer, 2001; Dijk, 2008, 2015).

2.2.1. The concept of power.

Van Dijk (2015) explains the concept of power as *control* – powerful people can *control* groups' acts, thoughts, and minds. Influential people can have hegemony over norms, laws, and rules that are largely accepted by others. Why do most people accept this as the norm? The answer is evident. Power does not always manifest itself in overtly abusive actions "*but may be enacted in the myriad taken-for-granted actions of everyday life*" (van Dijk, 2015). Thus, the dominant group controlling the most influential discourse also has the chance to indirectly/directly control the minds and actions of others – how and why something is perceived as a threat and under what conditions (van Dijk, 2015).

In most cases, access to influential discourse is itself a resource of power. These forms of discourse are politics, media, science, law, and alike (van Dijk, 2015). Thus, politicians and not citizens control the "settings" and define rules in the country, even in a time of Covid-19. According to van Dijk (2015), the dominant group may abuse its power in such situations - for example, by controlling media coverage, justifying censorship, and silencing powerless speakers. In general, influential speakers and institutions can control context, text, and discourse levels and structures to a greater or lesser extent. Such power can be abused to the detriment of specific recipients, groups, or civil society (van Dijk, 2015).

2.2.2. Wodak's Discourse-Historical Approach (DHA)

There are various approaches to CDA, among them three prominent scholars: Fairclough, Van Dijk, and Wodak (Amoussou & Allagbe, 2018; Wodak & Meyer, 2001). Fairclough provides a socio-cultural approach, while Van Dijk and Wodak - a socio-cognitive approach that perceives discourse as a form of social practice (Amoussou & Allagbe, 2018). What we need for this research is Wodak's DHA because it also highlights the importance of context – "*all discourses are historical and can be understood with reference to their context*" (Amoussou & Allagbe, 2018). As already mentioned, CDA is diverse and interdisciplinary and requires the integration of different disciplines to explore the relationship between text/language analysis and social practice (Wodak & Meyer, 2001; Amoussou & Allagbe, 2018). Furthermore, CDA avoids a rigid methodological framework, which is universally used in almost every study (Fairclough, 2001) and advocates a problem-oriented approach (Fairclough, 2001; Wodak & Meyer, 2001). For example, the law's text (written or spoken) depends heavily on language, giving an opportunity for discourse analysis (Shuy, 2015). The situation of changing and tightening laws and justifying the abuse of power in the context of Covid-19 makes the CDA particularly suitable for this topic.

The main difference between discourse analysis and CDA is that CDA focuses more on abuse of power, manipulation, and structural inequalities in areas such as politics and the media (Betti, 2021). CDA is not a "method" or "ready-made approach" but suggests the use of methods from discourse analysis, humanities, and social sciences in the study (Betti, 2021; Dijk, 2001).

2.3. Limitations

Van Dijk (1993) claims that CDA represents a "*solidarity with the oppressed*" and "*opposition against those who abuse text and talk to legitimate their abuse of power*"; thus, "*CDA is biased – and proud of it*." CDA has been criticised for its use of a small number of sources and its susceptibility to researcher bias in selecting texts for analysis (Sriwimon & Zilli, 2017). However, today we can minimise potential bias by obtaining a sufficiently large set of data and data from the state and publicly recognised non-governmental organisations. This will help reveal the complete picture of the situation and help avoid one-sidedness.

Another common criticism is that the approach needs to have methodological rigour. However, adhering to a more rigorous analysis, following at least some of the procedures suggested by Fairclough, such as analysing the processes of production and reception or social

analysis (Janks, 1997), supported by a deeper understanding of the social power dynamics behind the interaction would lead to a fuller and stronger analysis of the data (Frantz, 2003; Sriwimon & Zilli, 2017).

2.4. Data collection

The data selection criteria presented by Wodak and Meyer (2009) are as follows: 1) political units; 2) period of time; 3) social and political actors; 4) specific discourse; 5) specific fields of political action; 6) media and genre. Since the main objective is to determine which restrictions are excessive and questionable to keep people safe (securitisation rhetoric) during Covid-19 in Central Asia, the specific political units were narrowed down to the media sources, constitutions, and political statements in and about Central Asia. Both Russian and English-language texts were used. There is not one particular political actor, but many social and political actors from Central Asia. The specific period chosen is from early 2020 to the end of 2021, as this time frame demonstrates the situation in Central Asian countries since they recognised and controlled the virus. The press outlets selected are categorized as quality papers and claim to be objective and free from bias. International organizations' global rankings and reports universally accepted as objective and valid are used, such as Reporters Without Borders, Freedom House, Amnesty International, UN, World Press Freedom Index, Human Rights Watch, and International Partnership for Human Rights, and alike.

The research questions mentioned above will be answered by relying on secondary data, which includes a review of available academic articles and studies; data from government and non-government agencies and international organizations; data from commercial information resources (news, TV, journals, and alike.); as well as available research on Central Asia and data from the Internet. In addition, data from official government websites, government media, and published interviews with politicians and key government officials are important for this study. Moreover, it is necessary to analyse the constitutions of these countries in order to understand the scale of deviation from norms. In addition, researching existing cases similar to this one will also help find relevant information. Nevertheless, if none exists, this study of a region has another strength: *"the ability of an in-depth analysis of one region to shed light on the dynamics of other similar regions"* (Smith, 2018).

3. Theoretical Literature Review

This paper applies a securitisation framework introduced by the Copenhagen School (CS) of Security Studies to examine the response of CA states to Covid-19. This chapter will attempt to turn to the theoretical literature to fill the gaps left by existing research on health securitisation trends of the pandemic. Drawing on the existing theoretical basis of security studies, the chapter will explain how the securitisation of health care is linked to violations of freedom of speech, expression, and publication in the times of Covid-19. First, the reader is introduced to the basics of security studies and the main conceptual tools of analysis within CS of security studies. What follows is a conceptualisation of securitisation. The next section examines the applicability of the theories to the case of emergency constraints related to the health crisis. Also, the final section of the chapter will review whether and why the approach can be applied to the Covid-19 situation in Central Asia.

3.1.Introduction to Security Studies

Drawing on studies of the security literature and beyond, Stephen Walt (1991) frames security studies "*as the study of the threat, use and control of military force*"; and "*as a study that examines and identifies the conditions when the use of force affects people, states, societies; and the policies adopted to use or prevent that force*." This traditional approach to security studies has also been explained by Paul D. Williams and Matt McDonald (2018) in "*Security studies: an introduction*," where they characterised it as supporting political realism with *"the four Ss - state, strategy, science and status quo"* as core values. At the time, security studies were concerned with maintaining the status quo (Williams and McDonald, 2018). The great powers and most scholars saw security policy as a means of preventing drastic and revolutionary changes in international society (Williams and McDonald, 2018).

However, during the Cold War, new voices challenged the traditional approach, which began to speak out in favour of new ideas in the discipline (Walt, 1991; Williams and McDonald, 2018). As a result, there has been a split among security study scholars (Williams, 2008). Many argued that the security agenda should be extended to include other security dilemmas besides the existing ones and to cover new sectors apart from the state and the military (Walt, 1991; Williams, 2008). The significant shift in security studies came from Barry Buzan's (1983) work "*People, State and Fear*," in which the authors argued that security concerns not only states but all communities of people and cannot be reduced to a focus on military power (Walt, 1991; Williams, 2008).

Buzan's new approach highlights the key areas that started playing an important role: military security, societal security, economic security, political security, and environmental security (Buzan et al., 1998; Williams and McDonald, 2018). This change represents a shift from the traditional security system to a new one, emphasising that human security is the most important. Building on the famous statement that human security is concerned with human dignity (ul Haq 1995; Williams and McDonald, 2018; Taylor, 2004), the authors argue that the focus moved to peace, security, and human development as well as the relationship between different levels of analysis (e.g., between individuals and states) (Buzan et al., 1998; Williams and McDonald, 2018). States are no longer the only actors, but the priority is given to individuals, and the scope of the study transcends the disciplinary approach of IR (Williams and McDonald, 2018).

3.2.Contextualising the Copenhagen School

As it was already discussed, broadening the implementation of the security agenda into different sectors resulted in the division of sciences into disciplines (Buzan et al., 1998). Buzan, Wæver, and de Wilde (1998) describe them as "specific types of interaction", with each sector having different interactions - for example, the political sector is mainly concerned with governance. Regardless of how scientists try to separate the sectors to facilitate analysis, the relationship between them is inseparable, and the sectors form parts of the same whole (Buzan et al., 1998).

From this point on, the interpretation of security has been accepted as a semantic field that goes beyond the scope of military-strategic studies and now includes issues in different sectors (Buzan et al., 1998; Wæver, 1993; Eves et al., 2020). **According to Wæver, *"securitisation can apply to any area, and begins with the use of speech acts, which declare certain areas of public interest to be security concerns"* (Gozdecka, 2021). This expansion of areas that now fall under security concerns entitles us to use securitisation theory in this work looking at health security during a pandemic.**

3.3.Securitisation theory.

The main work in the framework of this theory is "*Security: A New Framework for Analysis*" by Buzan et al., (1998). In contrast to the traditional view, securitisation now includes the state, society, and the individual in the security referents (Buzan et al., 1998). Since it is a relatively new theory compared to other international theories, scholars are still debating whether securitisation is a theory, a concept, a philosophy, or a method; and most define it as

a speech act (Shipoli, 2018). In their work, Buzan et al., (1998) define security as "*the move that takes politics beyond the established rules of the game and frames the issue as a special kind of politics or as above politics*." Thus, securitisation is perceived as a continuation of politics, making it a "*more extreme version of politics*" (Buzan et al., 1998). The theory implies that the definition of public problems will depend on an actor - **the power in a high position can exploit the situation by politicising, depoliticising, or securitising the problem** (Buzan et al., 1998; Buzan, 1983). **Accordingly, the perception of problems/situations depends on how the actor offers the information and how it is perceived by the public** (Buzan et al., 1998).

Defining something as a national security issue gives it a higher priority over other issues (Buzan et al., 1998, p.24). By making the problem a priority and calling it a security issue, governments can use the rhetoric of an "existential threat"'to avoid political debate, which is called a "securitising move" (Buzan et al., 1998;). **Calling Covid-19 a global pandemic makes it a priority issue for governments because of its "existential threat" - thus the "securitising move" is to make Covid-19 the number one issue by surrounding it with threat rhetoric.**

In security discourse, the nature of the existential threat allows the use of emergency measures that are not supported and legitimate in normal times but are "necessary" in times of crisis (Buzan et al., 1998). Furthermore, publicly recognising a problem as a security issue makes it truly dangerous, as it allows the authorities to apply emergency measures to address the threat and make people recognise these measures (legitimisation) (Buzan et al., 1998). Thus, based on a discussion of the securitisation literature, the authors conclude:

> *"Security is a self-referential practice because it is in this practice that the issue becomes a security issue—not necessarily because a real existential threat exists but because the issue is presented as such a threat"* (Buzan et al., 1998, p.24)

There is no doubt that Covid-19 poses an existential threat, and countries should use the necessary emergency measures in times of crisis. **However, as mentioned above, publicly recognising a problem as a security problem allows the authorities to apply emergency measures to "eliminate the threat" - and these measures are not always aimed at protecting the public, as they are more methods of strengthening power and control (**Buzan et al., 1998**).**

Security is a process of social action, peaceful discourse and the power of certain social groups and individuals to influence others through persuasion based on political authority. (Buzan et al., 1998; Buzan, 1983; Williams, 2008). Even if security exists only within the legal framework, it is maintained by the individual through recognising the legitimacy of processes, even those outside the legal framework – security discourse (Buzan et al., 1998). In Copenhagen School's view, issues that have become security issues are handled with urgency and secrecy, with little political input on how these issues should be addressed (McDonald, 2008). In simple terms, security discourse is characterised by how actors construct problems as threats and prioritise the problem. Further, the problem must be accepted by an audience so that political leaders are disengaged from everyday politics and can take the necessary emergency action (Buzan et al., 1998). The articulation of threats usually takes the form of a "speech act", a theory best explained by John Austin (Buzan et al., 1998).

3.3.1. John Austin's Speech Act Theory.

John Austin's speech act theory states that securitisation is formalised as a speech act, meaning that actions are performed through language (Stritzel, 2014). This conceptualisation represents the conceptual development of the CS: initially positioning the speech act itself as securitisation before "speech acts" were defined as "securitising moves" (Buzan et al., 1998; McDonald, 2008). **This theory claims that words do not simply describe reality but create that reality** (Shipoli, 2018)**. For example, referring to the Covid-19 pandemic as an existential threat does not define or describe the virus itself but presents it as an imminent danger unless some action is taken.**

Three main conditions contribute to the success of the speech act of security: 1) speech is structured around security; 2) the person performing the speech must occupy an authoritative position; and 3) the objects/subjects being securitised are generally considered to pose a threat (Buzan et al., 1998). In order to persuade the audience to take emergency action, the actor must attract attention, often exaggerate the urgency and level of the threat, and suggest a possible solution (McDonald, 2008). **Most importantly, the issue becomes securitised if the audience agrees that the threat exists and supports extraordinary measures** (McDonald, 2008, Buzan et al., 1998). In turn, the audience relies on the discourse of government officials because they are representatives of constitutional legitimacy and therefore must have "compelling reasons" to declare the problem a threat (McDonald, 2008). Therefore, the three main components of securitisation are the speech act, the securitising actor, and the audience.

3.3.2. Constructivist Approach to Securitisation.

In their work "*Security: A New Framework for Analysis*," Barry Buzan, Ole Wæver, and de Wilde (1998) try to position analysis on a spectrum ranging from constructivist to objectivist. In doing so, the constructivist approach is compared with two others: traditional security studies (TSS) and critical security studies (CSS) (Buzan et al., 1998).

Security studies in TSS study "real" threats and how to deal with them (Buzan et al., 1998). As in all traditional fields, it also focuses on states, their interests, and their relationships (Buzan et al., 1998). CSS, by contrast, looks at the system in constructivist terms and suggests that if governments dominate the arena, it is the result of power politics suppressing the opposition, which could potentially replace governments if emancipatory practices can change power (Buzan et al., 1998). Critical theory is used to explore this discourse by looking at processes of unnecessary securitisation steps and highlighting other security issues such as environmental problems, poverty, and unemployment as more significant and threatening (Buzan et al., 1998).

The constructivist approach to security is interested in how things become security issues. As McDonald (2008) argues that the general concept of security within constructivist thought, if there is one, is that security is a social construct. That relates to the concept's meaning, the perception of threats, and the actions considered legitimate in providing security (McDonald, 2008).

3.4.Securitisation of Health Crisis

Since the 1990s, the broad area of securitisation has included health issues (Heymann et al., 2015). Heymann et al. (2015), in "*Global Health Security...*" explain in detail the history of health security from the bubonic plague to when the idea gained prominence with the global HIV/AIDS and SARS pandemic. WHO uses a broad definition of health security that includes: "*emerging infectious diseases where no cure or containment protocols yet exist, as well as diseases that weaken the food production chain, leading to shortages and hunger, and environmental disasters*" (Duarte, 2021).

Heymann et al. (2015) cite health issues *"as one of the most important non-traditional security issues that have arisen in two different ways"*. The first relates to "individual health security," i.e., health problems threatening people's well-being and lives. Mainly, it refers to access to adequate and safe health services, products, information, and technologies (Heymann et al., 2015). The second is about "collective health security," also known as the state-centred

concept of security when a health issue threatens international peace. This understanding of the concept is one of the dominant concepts of health security, rooted in attempts to stop the spread of the bubonic plague in the fourteenth century (Heymann et al., 2015).

Based on a number of studies, it can be argued that securitisation theory is used to understand the relationship between health and security in several ways (Duarte, 2021). For example, there have been critical analyses of emergency preparedness, the role of WHO as an entrepreneur of norms and an actor in securitisation, the impact of securitisation on state investment in health, and the risks of military responses to health crises (Duarte, 2021). To be considered a security threat, the phenomenon must be repetitive. Even though Covid-19 has many distinctive features, pandemics are recurring events that require emergency preparedness, preventative measures and communication (Duarte, 2021). Therefore, the language of security study can be used to describe the problems associated with Covid-19 and the regulatory measures applied around the world. (Duarte, 2021).

3.5.Securitisation in the Asian Context

Claire Wilkinson's (2007) study "*The Copenhagen School on Tour in Kyrgyzstan: Can Securitisation Theory Be Used Outside Europe?*" critiques the theoretical framework presented by CS. The author argues that the theoretical framework needs to be revised for empirical studies beyond the West (Wilkinson, 2007). The main arguments presented claim:

> *"First, the presence of the "Westphalian straitjacket" has prevented detailed interrogation of the normative concepts underlying the framework: there is a presumption that European understandings of society and the state are universal. Second, the centrality of the speech act for securitisation to the exclusion of other forms of expression, such as physical activity, results in the theoretical framework producing a Westernised description of a given situation"* (Wilkinson, 2007).

Having analysed the March 24 events in Kyrgyzstan, the author concluded that local features that do not conform to basic Westphalian presumptions are easily overlooked, reinterpreted, or "edited" to conform to linear analytical assumptions of securitisation (Wilkinson, 2007).

The Asian context in Claire Wilkinson's (2007) work has inspired many studies of security governance, starting from social and non-traditional security phenomena to more traditional topics such as the social construction of great power politics (Distler, 2021). Werner Distler (2021, p.8), in his analysis of a large body of critical security and securitisation research

as well as in Asian case studies (e.g., China and Afghanistan), concludes that critical security and securitisation research is promising in the Asian context from a critical-deconstructive or normative-reconstructive perspective and helps reconstruct the securitisation framework. Likewise, scholars use critical security studies to promote emancipatory research and draw attention to the problematic situation of vulnerable groups or as a means of deconstructing and critiquing the policies and politics of governments and international agents (Distler, 2021).

3.6.Framework for Analysis

Securitisation analysis aims to understand the process of developing a common perception of what should be seen as a threat (McDonald, 2008). Securitisation is studied by assessing the discourse and context of political action. Its purpose is to examine which arguments push the leverage so that people do not question the necessity of restrictions when certain rules are imposed (Buzan et al., 1998). The success of securitisation depends on these arguments - the most important thing is to convince the audience through the speech act that an existential threat exists, so that it voluntarily accepts all securitisation processes that are introduced (Buzan et al., 1998). According to Weaver (2011), to justify emergency measures it is necessary to establish that there is a threat; that the threat is existential; and the need for emergency measures. In order to explore securitisation during a pandemic, throughout the analysis the author uses discourses indicating the need for stricter rules to deal with the Covid-19 threat, as well as discourses describing the threat and justifying measures against that threat.

4. Literature Review

As noted above, the concept of securitisation relates to an attempt to reformulate a number of non-military themes and agendas into security issues. Securitisation is often used to provide legitimacy to the state's use of emergency measures as well as to increase the public's sense of urgency – moving something from the criminal or political sphere to the security sphere (Lemon, 2018). According to a number of authors, the power of elites to define anything as a security threat is *"a political technology in the hegemonic project of various agents"* (Lemon, 2018; Balzacq ,2005; Stritzel, 2011). Security studies have been evolving in Central Asia for a long time - scholars working there have studied how actors framed violent incidents, developed definitions of terrorism and extremism, and securitised such issues as extremism, riots, drug trafficking, and alike (Lemon, 2018). Many studies focus on how security issues in the region

are framed by actors and how these discourses are placed within a broader political context (Lemon, 2018).

In the Covid-19 crisis, securitisation is often referred to in connection with the discourse used by leaders to describe the crisis and justify these measures (Lemon, 2018). During the pandemic, journalists were among those who faced difficulties at work. The International Press Institute documented attacks on the press for doing their job – as of January 2021, Covid-19 Press Freedom Tracker has documented 544 press freedom violations, 199 prosecutions and 189 verbal or physical attacks, and 70 violations related to access to information worldwide (Griffen, 2021). The main reasons highlighted are: *"challenging government data, criticism of official responses, highlighting mismanagement of public health measures, and exposing corruption amid huge public expenditure to combat the spread of the disease"* (Griffen, 2021). However, these figures do not reflect the full picture and extent of censorship due to the extremely repressive systems in some countries – for example in Turkmenistan, Central Asia, "*authorities banned media from using the word "coronavirus" at all*" (Griffen, 2021).

The countries of the Central Asian region are located halfway between China and many of its trading partners, which makes the region exceptionally vulnerable to anything that happens in China (Ibbotson, 2020; Balakrishnan, 2020). Many observers and researchers highlighted the common measures implemented in the region at the early stage of the pandemic (Gleason and Baizakova, 2020, King & Jones et al., 2021; Ibbotson, 2020; Zhiltsov, 2020). In Kazakhstan, Uzbekistan, and Kyrgyzstan, those are a declaration of a state of emergency and closure of borders; introduction of quarantine for city residents, and suspension of all businesses that are not deemed necessary for a certain period in the big cities; mandatory mask-wearing and keeping a distance between people; closure of educational institutions and cancellation of public events; and restrictions on the movement of residents in large cities (Gleason and Baizakova, 2020, King & Jones, et al., 2021, Ibbotson, 2020; Zhiltsov, 2020). On the other hand, due to the non-recognition of the virus, the governments of Tajikistan and Turkmenistan have started to implement basic preventive measures without publicly declaring quarantine (Gleason and Baizakova, 2020; Ibbotson, 2020; Zhiltsov, 2020). As countries began to introduce containment measures aimed at combating the spread of the virus, international organisations and individual researchers began to notice a dramatic shift toward the violation of freedoms (Freedom House, 2021; Khramova, 2020; HRW, 2020; Putz, 2020).

Moreover, a number of studies revealed that the level of democracy in the world is declining, and the pandemic risks further entrenching authoritarianism (Shahbaz and Funk, 2021; Omelicheva & Markowitz, 2021). This problem is becoming increasingly acute as authoritarian leaders in many countries, regardless of political systems, use the pandemic to justify seizing power and further infringing on the rights of citizens (Shahbaz and Funk, 2021; Brannen et al., 2020). Most studies explain this tendency in other regions, and the Central Asian region is only mentioned in them. For example, these trends can be seen in the way how national governments in Lebanon, Iraq, Chile, Hong Kong (Brannen et al., 2020) and in South and Southeast Asia (Kurlantzick, 2020) have used public health emergencies to ban public protests and limit freedom of expression (Brannen et al., 2020).

The Law Library of Congress's research staff on "freedom of expression and free flow of information during Covid-19" reported on recent amendments to national legislation establishing control on media, Internet resources, and journalists, so-called "fake news" law (Roudik et al., 2020). Central Asian countries of Kazakhstan, Kyrgyzstan, Tajikistan, and Uzbekistan are among the 20 countries that have passed such a law, whereas none were identified in Turkmenistan (Roudik et al., 2020). The report explains this by saying that Turkmenistan is known for its atmosphere of hostility towards journalists, which has not changed during the pandemic (Roudik et al., 2020). Studies suggest that many governments claim to use "fake news" laws to reduce disinformation, prevent panic, and maintain public order (Roudik et al., 2020; Shahbaz and Funk, 2021; Fremer, 2020). However, in the author's view, the main questions are how these laws are used and for how long they will be in force. For example, regional studies by Human Rights Watch (2021) and Reporters Without Borders (2021) show that they are mainly used to silence people who are critical of government actions. Further research revealed that these laws could lead to increased censorship of political dissent, investigative journalism, and expression of ethnic, religious, sexual, or gender identity, especially among marginalised groups (Shahbaz and Funk, 2021; Freedom House, 2021; Fremer, 2020).

In the report "Freedom of Expression during Covid-19," which includes Central Asian countries, Iana Fremer (2020), a legal research analyst, stated that some governments' actions aimed to establish new systems of regulation. The system ranges from creating new regulatory bodies to changing existing criminal and administrative laws (Fremer, 2020; Griffen, 2021). Fremer (2020) claims that **"*authorities of all the countries researched justified their efforts to restrict media freedoms and impose more censorship on Covid-19-related news coverage***

***by the need to counter the so-called "fake news" problem*.**" At the same time, new media-related laws have been characterised by over-regulation and attempts by these governments to restrict freedom of expression by suppressing critical voices of opposition or civil society by amending existing media laws and administrative and criminal codes (Fremer, 2010). In some cases, these actions have included declaring a state of emergency and claiming that the measures taken are of a "temporary nature" (Fremer, 2020). However, the problem of defining the legal criteria for the application of the fake news law and the extent of its use over time remains to be determined (Fremer, 2020; Griffen, 2021). In moments of crisis, emergency measures often arise, which result in lasting changes to the legal framework. The author believes that governments are willing to leave disinformation laws in place and regularly use them during normal times against criticism and unwanted reporting.

4.1.Conceptualising "Fake News"

Previous studies have attempted to classify and define the concepts of fake news, misinformation, and disinformation and to conceptualise them (Lazer et al., 2018); to break down the conceptual differences and similarities between a range of concepts related to information (Southwell, Thorson, and Sheble, 2017; Jack, 2017); and to reveal how scholars and politics have used the concept (Tandoc, Lim, and Ling, 2018). According to Ang et al. (2021), who tried to understand the terminology and meaning of "fake news" and disinformation in the context of the pandemic, "*disinformation can be knowingly spreading false information and rumours, which can be used as part of an internal group's political agenda, and some state-sponsored disinformation campaigns that can undermine national security and sustainability*." It is also a huge class of false information, and rumours spread without a broad political purpose or lies spread for financial gain (Ang et al., 2021). However, this understanding of disinformation and fake news is not new. Previously, Vosoughi et al. (2018) and Molina et al. (2019) have already written that the term "fake news" was polarised and used by politicians to refer to any information published by sources that did not support their party positions. However, Ang et al. (2021) were the first to apply it to the pandemic issue.

4.2.The Shadow of the Soviet Union in Contemporary Central Asian

Victor Ramraj and Matthew Little (2021), in the book "Covid-19 in Asia: Law and Policy Contexts," explain the imposition of "fake news" laws claiming that pandemic containment requires enormous sacrifices by society, and such sacrifices may be made voluntarily or imposed by governments through various forms of coercion and punishment. One of the primary points is that in some regions the legacy of colonial legal arrangements

plays a significant role, raising concerns about how their modern successors use legal instruments to contain the virus (Ramraj & Little, 2021). Authors use as an example the measures taken in Asian countries such as Japan, Thailand, and India, where governments use both formal legal instruments designed for this purpose and respond with existing legislation or a special legal regime (Ramraj & Little, 2021). Fremer (2020) comments that the choice to respond through law raises important questions about the potential for abuse of power, the role of expertise, and its limits.

In support of Ramraj and Little's view and its application to Central Asia, we can use Friedman et al. (2010) work, "Two Decades of Repression: the persistence of authoritarian controls on the mass media in Central Asia," to understand the situation of free speech rights and access to information in Central Asia before the pandemic. According to Friedman et al. (2010), we need to delve into the history of the long domination of Central Asia by the Soviet Union, where no independent, critical, or opposition media existed. Thus, in Central Asia, as in the rest of the USSR, all media outlets were almost exclusively in state hands, and the main task of the publications was to promote Marxism and advance the party's agenda (Friedman et al., 2010). Accordingly, the experience of the Soviet era has created additional obstacles to the development of the region's media and journalistic methodology in modern times (Friedman et al., 2010).

Friedman's et al. (2010) statement is supported by Richard Shafer's (2011) observation of the values of Soviet journalists, which are: (1) expressing party philosophy and goals; (2) spreading the ideology of Marxism-Leninism; (3) truthfulness; (4) popular orientation - accountability to the people and people's access to the state press; (5) mass character - the press not only serves the people, but also functions among them; (6) and criticism - criticise the shortcomings and failures of the party and government, and criticise media shortcomings. Richard Shafer (2011) conclude that these values continue to limit the development of pluralist media in Central Asia even after independence. Both Richard Shafer (2011) and Friedman et al. (2010) emphasise the role of Western-style journalism, which tries to implement transparent mechanisms of journalism as an alternative to Soviet ideology within a system in which journalism focuses on propaganda and support for authority. The shift toward changes in media values of the Central Asian region is best explained in the chapter "Loyalty in the New Authoritarian Model: Journalistic Rights and Duties in Central Asian Media Law" of the book "After the Czars and Commissars" by Olivia Allison (2011). Of particular importance is the 1991 Soviet Media Law, which, according to Olivia Allison (2011), has a particular role in

"shaping new media laws in the region and the formation of the laws designed to drive critical voices into a "semi-legal state"."

4.3.International Standards and Laws on Freedom of Expression and their Implementation in Central Asia

According to Richter (2010), in "International Standards of Freedom of Expression and their Implementation Practices in Central Asia," Western political scientists and philosophers coined the term access to information. Richter (2010) draws attention to the opportunities that access to information offers, as "*the right to receive and share information is a key guarantee of citizens' right to participat*e in democratic processes" (p.25), which helps maintain people's trust in the authorities. Richter (2010) stresses the importance of the domestic and international instruments guaranteeing freedom of information to which the Central Asian states have consented. The most important ones, according to Richter (2010) and Afzal (2004), are Article 19 of the Universal Declaration of Human Rights (UDHR), adopted by the UN General Assembly, which defends:

> *"Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers*" (see Resolution 217A) [1].

Also, the International Covenant on Civil and Political Rights (ICCPR) provides fundamental rights that are binding to every UN member (Article 19)[2]. Similarly, other documents by the Organisation for Security and Cooperation in Europe (OSCE), such as the Final Act of the Helsinki Conference[3], the Final Document of the Copenhagen Meeting of the OSCE Conference on the Human Dimension[4], the Charter of Paris[5] adopted in 1990, the Budapest

[1] The United Nations General Assembly adopted Resolution 217A (III) on December 10, 1948. See the complete official text in the English language at the UN website: http://daccess-dds-ny.un.org/doc/RESOLUTION/GEN/NR0/043/88/IMG/NR004388.pdf?OpenElement

[2] Article 19 1-2, adopted by General Assembly resolution 2200A (XXI) on December 16, 1966. The International Covenant on Civil and Political Rights (ICCPR). See the complete official text in the English language at the UN website: https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-civil-and-political-rights

[3] Final Act of the Conference on Security and Co-operation in Europe, Helsinki, August 1, 1975. See the complete official text in English on the OSCE website: www.osce.org/mc/39501

[4] Copenhagen Meeting of OSCE Conference on the Human Dimension, June 1990. See, in particular, i.i. 9.1 and 10.1.

[5] Charter of Paris for a New Europe. OSCE Summit of Heads of State, November 1990.

Summit Outcome Document[6] in 1994 and the Declaration of the OSCE Istanbul Summit[7] (Richter, 2010; Afzal, 2004). Although the documents mentioned above are not directly binding on the Central Asian countries, Richter (2010) believes that they set a model for ensuring the right to freedom of expression and can be used to interpret legally binding Article 19 of the International Covenant on Civil and Political Rights. In addition, "*they represent generally accepted international norms and rules to which the national constitutional laws of the Central Asian countries are oriented*" (Richter, 2010, p.29).

Turning to the main argument, Richter (2010) and Human Rights Committee (ICCPR) (2011) stress that the conditions for restricting the right to information must only be legitimate and necessary and must be taken in accordance with Article 19(3)[8]. However, as legal observers claim, Article 19 has unclear restrictions which leave excessive discretion to the executive (Richter, 2010; Afzal, 2004; Fremer, 2020). Also, the authors argue that the right to seek, receive and impart information of all kinds is not absolute - legitimate interferences are possible in certain circumstances and are included in OSCE documents (Richter, 2010; ICCPR, 2012). **The pandemic provided such conditions when authoritarian governments treated it as a security crisis to divert attention away from the failed policies and implemented new laws** (The Economist, 2021; Eves & Thedham, 2020).

4.4.Securitisation of Covid-19 in Central Asia

According to Omelicheva and Markowitz's (2022) "*approaching a pandemic from the perspective of a security crisis gives the ruling elites more room to mobilise security resources and helps them justify using coercive social control methods*." However, they claim that contrary to expectations, these governments have used a deliberately limited representation of the health crisis (Omelicheva and Markowitz, 2022). Research states that no regime in the Central Asian region used discursive frameworks or cultural tropes that regularly presented disease as a security threat (Omelicheva and Markowitz, 2022). Authors explain this rhetoric

[6] Towards a Genuine Partnership in a New Era. OSCE Summit of Heads of State, Budapest, 1994, i.i. 36 through 38.
[7] OSCE Summit of Heads of State in Istanbul, 1999, item 27. See also item 26 of the Charter for European Security adopted at
the same summit.
[8] Article 19 3(a,b), adopted by General Assembly resolution 2200A (XXI) on December 16, 1966. The International Covenant on Civil and Political Rights (ICCPR). See the complete official text in the English language at the UN website: https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-civil-and-political-rights

of limited securitisation by the dual claims to presidential power in Kazakhstan; the leadership vacuum and split of elites in Kyrgyzstan; and the turn to technocratic rule in Uzbekistan and exploitative and personalistic rule in Tajikistan (Omelicheva and Markowitz, 2022). The authors believe that these developments have caused a lack of securitisation processes in Central Asia, although they have been used successfully in the past (Omelicheva and Markowitz, 2022).

Securitisation is the most common mechanism and one of the features of weak statehood in Central Asia (Burnashev, 2015). This cannot change as rapidly as the aforementioned authors claim, especially in a time like a pandemic. Perhaps less extensively than this mechanism has been used in the past, but it is definitely present in areas such as freedom of speech and access to information during the pandemic. To this end, the following chapters present an analysis of the discourses in each country of the region.

5. Analysis

The aim of the analysis is to examine the security discourse that justifies violations of freedom of expression and access to information during a pandemic. The next chapter attempts to explore the legitimisation of censorship and media control through an examination of laws and political statements, and speeches. This will be done on the basis of the framework presented above. This analysis will look at cases where a securitising actor seeks to legitimise actions that are excessive and illegal. The analysis will examine the speech acts that constitute discourse in speeches and explore if elements of the securitisation process can be identified in speeches. The aim is to provide a comprehensive answer to the research questions posed: What laws regulating freedom of expression and access to information have been adopted/exist in Central Asian states in the context of the pandemic? and Do these measures constitute excessive and beyond to what is permissible?

For a holistic study of securitisation, an in-depth understanding of the context is crucial in order to analyse and explain the relationships between events (Balzacq, 2011). Therefore, in order to study the discourse, it is important to define its social and historical context. The next section provides general background information.

5.1.Case studies of Central Asian countries

The first cases of the coronavirus were officially registered in Kazakhstan on March 13, in Uzbekistan on March 15, and in Kyrgyzstan on March 18 (Ionova, 2020; Omelicheva & Markowitz, 2022). The authorities of these republics, having analysed the experience of other countries, chose the Chinese version of controlling the epidemic (Ionova, 2020; Omelicheva & Markowitz, 2022; Gleason and Baizakova, 2020). Tajikistan and Turkmenistan have chosen a different tactic - ignore the problem. Eventually, Dushanbe acknowledged the presence of the virus in the country only on April 30, ahead of a visit by a WHO delegation, while in Turkmenistan, according to official statements from Ashgabat, COVID-19 has not been detected (Gleason and Baizakova, 2020) (see chart1).

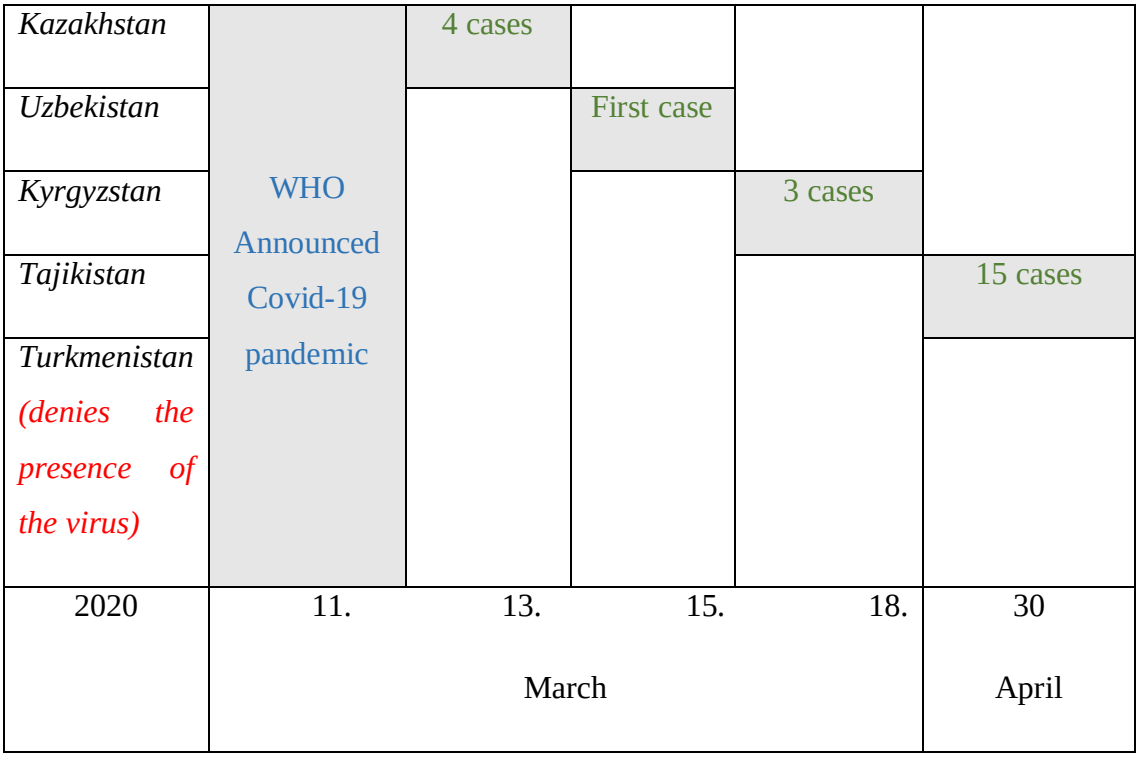

Chart 1: Newly detected cases of COVID-19 in CA countries (Gleason and Baizakova, 2020)

In order to prevent the spread of the epidemic, all five Central Asian republics severely limited their communications with the outside world (Gleason and Baizakova, 2020). Air service was suspended, state borders were partially or totally closed, and quarantine was introduced for citizens arriving into the republics (Gleason and Baizakova, 2020). The authorities of Kazakhstan, Uzbekistan and Kyrgyzstan imposed strict state-level measures in the initial phase of the epidemic. Schools were closed, students were switched to online education, all entertainment and sports events were banned, and services of all religious

denominations were suspended, including Friday prayers in mosques (Ionova, 2020; Gleason and Baizakova, 2020). Kyrgyzstan, followed by Kazakhstan and Uzbekistan, cancelled the celebration of the traditional Muslim holiday Nowruz (Ionova, 2020). Kazakhstan and Kyrgyzstan have imposed a state of emergency in some cities (Ionova, 2020). Checkpoints have been set up in and around cities to control the movement of people, and military biological defence units have initiated disinfection work (Ionova, 2020; Gleason and Baizakova, 2020). The toughest measures against the virus were imposed in Uzbekistan, where the authorities placed the entire country under strict quarantine (Gleason and Baizakova, 2020). While in Tajikistan, the restriction has been limited to the compulsory wearing of medical masks and the declaration of holidays in schools (Ionova, 2020; Gleason and Baizakova, 2020). Also, in Turkmenistan, where the word "coronavirus" itself was banned, there was no quarantine, no closure of educational institutions, and mass events were held to celebrate Nowruz (Ionova, 2020; Gleason and Baizakova, 2020).

The following passages use critical discourse analysis to examine the impact of the pandemic on freedom of expression, mainly how media laws have been used and how governments have justified excessive bans on access and dissemination of information. The political situation in each country, as well as existing and recently enacted laws, are discussed to give an understanding of what policies contrary to freedom of expression exist or have been introduced during the pandemic.

5.1.1. Kyrgyzstan

Compared to its Central Asian neighbours, Kyrgyzstan underwent more drastic attempts at democratisation after the collapse of the Soviet Union (Terzyan, 2022). Most observers argue that this is the result of the country's poor economy, which has pushed it to become increasingly dependent on foreign loans and credits. The positive outcome of this dependency has been enormous international influence, accelerating the transition to democracy and helping to support the state's reputation as an "island of democracy" (Terzyan, 2022). However, despite the original goals of becoming a stable democracy with respect for and protection of human rights, effective reforms to achieve this goal have never taken place. *"The country remains endemically corrupt, lacks political will and has a culture of impunity or a "legal mentality" - a mentality where people believe that there are no consequences for ignoring or undermining the legal process"* (Terzyan, 2022). After the third revolution in Kyrgyzstan's history, Japarov's rise to power has led to a tightening of efforts against the pandemic and ambitious constitutional reforms (Terzyan, 2022). The most important reform

was aimed at returning Kyrgyzstan to a presidential system, which was seen as an attempt to monopolise power in the hands of the president (Terzyan, 2022). These events, combined with the pandemic, once again proved the weakness of civil society and state institutions, especially those responsible for protecting rights and ensuring transparent decision-making processes in Kyrgyzstan in 2020 and beyond (Alisheva, 2020).

The fundamental KR rights to freedom of thought and opinion are included in Article 32 of the Constitution: (Part 1), as the ensuring rights to freedom of speech, the press, expression of opinion (Part 2), and not to be coerced or denied (Constitution of KR). The rights of access to information are also accumulated in Article 33 (Constitution of KR), which enshrines the right of everyone (Part 1) "*to freely seek, receive, store, use and disseminate information orally and in writing or otherwise*"; (Part 2) the right of access to information about oneself, and the right to access information held by state bodies; (Part 3) local self-government bodies and their officials; (Part 4) and the right to access information about their activities (Constitution of KR). Along with the rights and freedoms, the Constitution of the Kyrgyz Republic provides for their restrictions in order to "*protect national security, public order, public health and morals, the protection of the rights and freedoms of others, as well as taking into account the characteristics of military or other public services*" (Constitution of KR, 1, part 2 of article 23). There are several laws on Media (Younas, 2021):

- *On Mass Media,*[9]
- *On the Protection of Journalist rights,*[10]
- *On TV and Radio Broadcasting,*[11]
- *On Advertising,*[12]

In Central Asia, the country consistently receives the highest marks for freedom of speech and expression, including in the sections on media independence and the expression of political opinion (Freedom House, 2022). Based on Freedom House's (2020) results, KR ranked 38th out of 100 countries in terms of press freedom, which defines it as semi-free. At the same time, the results of The Reporters Without Borders (RSF) index ranked KR 82nd out of 180 (RSF, 2020). RSF indicates the freedom of speech and press enjoyed by Kyrgyz

[9] Law of the Republic of Kyrgyzstan " On Mass Media" accessed at < http://minjust.gov.kg/ru/content/38
[10] Law of the Republic of Kyrgyzstan " On the Protection of Journalist Rights" accessed at < http://medialaw.asia/node/117
[11] Law of the Republic of Kyrgyzstan " On TV and radio broadcasting" accessed at < http://cbd.minjust.gov.kg/act/view/ru-ru/202317?cl=ru-ru
[12] Law of the Republic of Kyrgyzstan " On advertising" accessed at < http://cbd.minjust.gov.kg/act/view/ruru/162/210?cl=ru-ru#

residents as "*the exception in Central Asia, in an officially corrupt and unstable economy*" (RSF, 2022). As part of its assessment of progress toward the goal of freedom of expression in its Media Sustainability Index, IREX argues that freedom of the press and freedom of expression are guaranteed by Kyrgyzstan's constitution and legal framework (IREX, 2020).

Despite the high ranks in freedom of speech and expression indexes, the reports cited above do not deny the fact that the government of KR still controls all traditional media and tries to extend its influence over private media (Arykbaev & Isaeva, 2021). Studies reveal that the authorities continue to harass the media, journalists, and human rights defenders, systematically deny journalists accreditation and access to meetings and court hearings, as well as failing to fulfil their obligation to provide relevant information on request (MPI, 2020). Monitoring the freedoms of access to information and freedom of expression in Kyrgyzstan from March 2020 to May 2021, conducted by the independent non-profit organisation Media Policy Institute (MPI), recognised several vital factors that influence the state of freedom of speech and the right to disseminate information (MPI, 2021). Since the beginning of the reporting period in 2020 in KR, these factors include (1) restrictions related to the coronavirus pandemic; (2) restrictions on rights and attacks on journalists during the October 2020 parliamentary elections; (3) a period of political instability related to the violent change of government on October 5, 2020; (4) the adoption of the new Constitution, which spells out rules that limit free speech and freedom of peaceful assembly; (5) the disproportionate response by law enforcement and authorities to criticism in social media (MPI, 2020). MPI (2021) reveals that the freedom of speech and the rights of citizens to disseminate information have been adversely affected by the restrictions and conduct of a state of emergency (Decree of the President of the Kyrgyz Republic, 2020) caused by the Covid-19 pandemic. Usually, a state of emergency is regulated by different laws: the Constitutional Law of the Kyrgyz Republic, "On State of Emergency," and "On Civil Defense" (MPI, 2020). These legal acts do not provide for the limitation or prohibition of media activities. However, journalists and bloggers covering the Covid-19 response faced intimidation, detention, physical attacks, and interference with their work (Freedom House, 2022). During the emergency, the media, news agencies, and journalists could not fulfil their duties.

The imposition of an emergency has led to travel restrictions on the grounds of protecting public health and preventing the spread of infection (Alisheva, 2020). Bishkek and two major southern cities, Jalalabad and Osh, and three provincial districts, have introduced curfews and restricted traffic (Alisheva, 2020). Such restrictions affected the quality and comprehensiveness of media coverage as court hearings were conducted without journalists,

access to information about the pandemic and the authorities was restricted, media accreditation was denied, and statistics on illnesses and deaths were not always updated in time (Alisheva, 2020).

These policies primarily affected independent outlets, while the state-owned media were used as a government mouthpiece about the pandemic (Alisheva, 2020). The primary source of information on the epidemiological situation in Kyrgyzstan at that time were statements, reports, speeches, and official data coming only from representatives of state authorities, mainly by the Commandant of the Republican Operational Headquarters for the Prevention of the Spread of Coronavirus Infection (Alisheva, 2020). Investigative interviews with independent journalists conducted by the television station "Nastoyashchee Vremya" revealed that 1) Coronavirus information was hard to obtain as 1) the government commission published little information, 2) official bodies did not respond to queries, 3) and many politicians and civil servants were simply unavailable at the time (Begalieva, 2020). On this basis, we can conclude that the chosen approach violates the principle of equality in creating the conditions necessary for the non-state media to operate.

According to the MPI report (2021), in addition to the journalists' difficulties, there were complaints from doctors and residents who informed the public through social media about the lack of actions against the pandemic, criticising those in charge. Many hospitals suffered from a shortage of medicines, protective equipment, and supplies. In many regions, instead of addressing these problems, a series of detentions and preventative interviews were conducted with the authors of social media posts about concerns related to coronavirus infection (MPI, 2021). In most cases, these conversations ended with the authors "repenting for what they had done and asking for forgiveness for spreading inaccurate information" (MPI, 2021).

The Association of Non-Profit Organisations conducted a survey among the population and found that they needed more official information about the new virus: how to prevent it, how to treat it, and the statistics (Tokoeva, 2020). This study, supported by the Office of the UN High Commissioner for Human Rights in Kyrgyzstan, found that the lack of information has increased the mortality and morbidity of Covid-19, as well as the distrust of the population towards the authorities (Tokoeva, 2020). The study found that Kyrgyz citizens were not helped by government briefings, published orders of the Bishkek Commandant's Office, or "contradictory" publications in the media and on social media (Tokoeva, 2020). Moreover, citizens were not sufficiently explained the sanitation rules under the emergency regime, ultimately leading to them becoming violators of the state of emergency (Tokoeva, 2020). The

trust in civil servants has also been undermined by their own violations of sanitary requirements and the misreporting of earlier information on the number of cases:

> *"Respondents noted that based on the fact that they see a large number of people infected among their environment while official statistics are low, respectively, they do not reflect the real picture of Covid-19 infected and sick people in the country"* (Tokoeva, 2020).

Consequently, many citizens engaged in self-treatment, following the recommendations of acquaintances, relatives, and doctors (Tokoeva, 2020). It can therefore be concluded that the official statistics are incomplete, as they do not take into account the population who have been self-medicated at home.

Observers of the International Partnership for Human Rights (IPHR) claim online grievances began even before the pandemic, at the time of the political crisis in October 2020, but have since risen to a new level (IPHR, 2020). A prime example is the Law on Protection from Inaccurate (False) Information, signed by Sadyr Zhaparov on August 23, 2021 (IPHR, 2020). Contradictions with rights began not only after the law came into force but during the very process of its adoption. Thus, after a public debate on the benefits and harms of the bill, it was rejected by Parliament on June 30, 2021, and was not signed into law by then-President Sooronbay Jeenbekov (IPHR, 2020). The document was put to the vote again on July 28 of the same year by Sadyr Zhaparov (IPHR, 2020). The procedure for reconsidering already rejected bills was violated during the adoption of this document, as rejected legislation can only be reconsidered after six months (IPHR, 2020). That means that the Bill on Protection from Inaccurate (False) Information could only be put to vote in January 2022.

This new law establishes a broadly defined prohibition on disseminating "inaccurate" or "false" information over the Internet (Terzyan A., 2022). It obliges owners of websites and pages to remove any content immediately based on complaints from anyone claiming that the content has tarnished their honour, dignity, or reputation (IPHR, 2020; president. kg, 2021). The members of the Parliament claimed that this law is necessary to deal with the dissemination of incorrect information about Covid-19 (Terzyan A., 2022). Member of Parliament Gulshat Asylbayeva, initiator of the law, said the law aims to protect the rights of citizens to receive accurate and correct information:

> *"No one is protected from false information, so the state must protect the honour and dignity of its citizens. The law seeks to limit interference in privacy and protect human rights"* (Tagaev, 2021).

There are concerns raised among organisations monitoring the human rights situation in Kyrgyzstan about the possible use of the KR Law on "Protection from Inaccurate (False) Information" as a tool to protect officials from criticism because of the vague wording of the law (MPI, 2021, RSF, 2022) that will profoundly damage the country's human rights record (Terzyan A., 2022, HRW, 2021). They see the law as an attempt to create a procedure for blocking content undesirable to the authorities administratively and without a decision by the court (Terzyan A., 2022). Immediately after the law was passed, the media started receiving letters from politicians suspected of corruption, who referred to it and demanded that articles mentioning them be removed (Terzyan A., 2022). Similar demands referring to this law started coming to the media from private companies (MPI, 2022). MPI analysis revealed:

> *"Laws that are vague and do not allow citizens to foresee consequences will result in restrictions on the right being seen as illegitimate and unfair. In addition, such vague laws result in authorities having to make decisions arbitrarily, at their own discretion, or in anticipation of political "expediency"... The decisions proposed in the draft are deliberately aimed at serious violations of the human rights to freedom of expression and opinion. The proposed draft establishes a kind of censorship prohibited by law"* (MPI, 2020).

Even if the reason for passing the law was the impending parliamentary elections and an attempt to silence the voices of critics, it also had a substantial impact on coverage of the pandemic. Overall, the MPI (2021) monitoring team recorded 24 reports of restrictions related to the pandemic. Many observers claim that the problematic new law was introduced to increase government control of the media and press (Terzyan A., 2022). Fear of a new and unknown virus led to the spread of news about the disease, which in some cases contained inaccurate information. It also created a wave of resentment among the population, who were dissatisfied with the action/inaction of the government. Such reports from residents attracted the attention of Kyrgyzstan's State National Security Committee (SNSC), which tried to stop the spread of "inaccurate" information to "curb 'panic' sentiments" (MPI, 2021). The pressure on free media has made it difficult for journalists to work, violated their fundamental rights, and affected many people in the country (HRW, 2021). For example, the HRW review says the following:

> "*Disproportionate restrictions on freedom of expression can make it more difficult to combat misconceptions about Covid-19, including conspiracy theories about misguided and dangerous treatments, which have become widespread on social media and offline"* (HRW, 2021).

Moreover, the new "fake news law" is too broad in scope, lacks clear definitions of key concepts, and provides insufficient procedural safeguards (Article 19, 2020; MPI, 2021). Excessively vague laws are open to arbitrary interpretation and easily abused (MPI, 2021). Under the "fake news law," public authorities can, without a court order, close down a website they deem to be disseminating false information (Article 19, 2020; MPI, 2021). It severely threatens freedom of expression in Kyrgyzstan, contrary to the country's international obligations to freedom of expression, access to information, and the right to privacy (MPI, 2021).

Based on the analysis, MPI (2021) concludes that restrictions on freedom of expression and pressure on citizens by law enforcement agencies and authorities in Kyrgyzstan during the coronavirus pandemic are inconsistent with the guarantees on access and dissemination of information set out under the laws of the Kyrgyz Republic. The fundamental provisions of the Constitution were violated, where any restriction of rights and freedoms is permitted only on the basis of law (Article 17). The law also prohibits restricting access to information and facts that infringe on the rights and legitimate interests of citizens or endanger their safety during emergencies that threaten the safety and health of citizens (Law of the Republic of Kyrgyzstan of March 15, 1999, Article 17).

5.1.2. Kazakhstan

Since gaining its independence, the Republic of Kazakhstan has been considered a regional leader in many spheres due to its rapid economic growth, modernisation, and political stability (Terzyan A., 2022). Thus, Kazakhstan portrays itself as a "success case" in the region and tries to support this image. However, observers argue that this success comes at the cost of individual rights and freedoms (Terzyan A., 2022). Even if the shift in leadership in 2019 has brought some positive changes, there has been no improvement in human rights indicators - they remain unsatisfactory (Terzyan A., 2022).

In the Constitution of Kazakhstan, adopted in 1995, the country positions itself as a democratic, secular, legal and social state whose highest value is man and human life (Constitution of RK). A social state is a state that declares as its main principle the provision of education, health care, and housing for its citizens, the fight against poverty and unemployment, the safety of its citizens, and the fulfilment of other such social needs (Kydyrbayev O., 2021, p.31). However, there is no consensus on the effectiveness of the social reforms: some see them as a success because of the growth of the economy and the welfare of

people, while others believe that the policy does not fulfil the obligations of the social state (Kydyrbayev O., 2021, p. 33). Representatives respond to such comments by saying that Kazakhstan seeks to fulfil the obligations of a social state in accordance with "the country's real capacities" (Kydyrbayev O., 2021, p.33). Different laws and regulations are adopted in accordance with, and in development of, the principles and rules of the Constitution (Younas, 2021):

- *On Mass Media* dated July, 1999 (amended in February, 2009) – regulates mass media, activities of the media, the dissemination of the media, the relations of the media citizens and organizations, rights, obligations and accreditation of journalists, and responsibility for violation of legislation on the media mass media;[13]
- *On Informatisation* dated January, 2007,[14]
- *On Communications* dated July, 2004,[15]
- *On TV and Radio Broadcasting,*[16]
- *On Advertising.*[17]

Kazakhstan continued to pursue its social policies during the Covid-19 pandemic. That included the confirmation of the first Covid-19 cases not only on its territory but in the region (Omelicheva & Markowitz, 2022), and the declaration of a national state of emergency, despite its apparent damage to the economy (Kydyrbayev O., 2021, p. 34). Alongside it, support for small and medium-sized enterprises, employment promotion, wage supplements for healthcare workers, and social benefits for people who lost income during the pandemic reflect the country's strong social policy (Kydyrbayev O., 2021, p. 34). Also, the government of Kazakhstan, following the example of many countries around the world, has taken a number of measures against the dissemination of misleading information about the coronavirus (Bocharova M., 2021). With the support of the Ministry of Information and Social Development, they created Stopfake.kz, an online portal to respond quickly to false information (Bocharova M., 2021). The government successfully informed the public through the TV and

[13] Law of the Republic of Kazakhstan " On Mass Media" accessed at < https://online.zakon.kz/document/?doc_id=1013966#pos=5;-106
[14] Law of the Republic of Kazakhstan " On Informatization" accessed at < https://online.zakon.kz/document/?doc_id=33885902
[15] Law of the Republic of Kazakhstan "On Communications" accessed at < https://online.zakon.kz/document/?doc_id=1049207
[16] Law of the Republic of Kazakhstan "On TV and radio broadcasting" accessed at < http://medialaw.asia/document/-11222
[17] Law of the Republic of Kazakhstan "On Advertising" accessed at < https://online.zakon.kz/Document/?doc_id=1045608

media about Covid-19, using many different formats in its reporting: the media covered all areas affected by the pandemic and the state of emergency, and experts systematically expressed their opinions in interviews and expert columns (Glas O., 2020, IPHR, 2020).

Act No. 387-II of February 8, 2003, on the "State of Emergency," stipulates that it is "*a temporary measure taken solely in the interests of the security of citizens and the protection of the constitutional order of the Republic of Kazakhstan, which allows for the imposition of certain restrictions on the rights and freedoms of citizens*" (The Law of the Republic of Kazakhstan on the State of Emergency)[18]. A state of emergency throughout Kazakhstan was declared on March 16, 2020, by Presidential Decree of March 15, 2020 (Terzyan, 2022). The same decree established and empowered the State Commission for Ensuring the State of Emergency under the President of the Republic of Kazakhstan, which determined the restrictions and exemptions to be imposed. However, it should be noted that according to Article 17 of the Emergency Law, "measures and restrictions imposed must not contradict international human rights treaties ratified by the Republic of Kazakhstan" (The Law on the State of Emergency)[19].

Notwithstanding this, the authorities tightened the space for criticism of the government even further, suppressing independent media, civil society organisations, opposition and activists' movements, often under the guise of pandemic control (Terzyan, 2022, IPHR, 2020). Moreover, Kazakhstan's state-funded media presented the public with an image of a robust social state that successfully fulfilled its duties during Covid-19 (Kydyrbayev, 2021, p. 36). It has become clear that the state media are serving the country's authorities: they have become propagandists for the Kazakh government instead of demanding answers from it and monitoring its actions. Thus, the image of a robust social state served to win the people's trust and legitimise political power (Kydyrbayev, 2021, p. 43).

In turn, independent media representatives were only allowed to move if they had an editorial assignment and official registration (OSCE, 2020), and experienced self-censorship (Freedom House, 2021). It was also forbidden to make audio, photo, and video recordings in healthcare organisations, ambulances, quarantine rooms, carrying out epidemiological investigations in outbreak areas, or interviewing and questioning patients (OSCE, 2020). According to human rights defenders, this ban violates Kazakh law, where recording can only

[18] https://online.zakon.kz/Document/?doc_id=1036912
[19] Ibid.

be banned based on 11 reasons, none related to epidemiological risks (OSCE, 2020). The ban prompted the scandalous detention of KTK television journalists in the Atyrau region, where the Operational Headquarters for the Emergency Situation distributed a statement that the camera crew had become a threat of infection to police officers (OSCE, 2020). Even in state media, critical voices were raised.

Highlighting the most important things from the passage, the ban made it difficult for journalists to get reliable information directly from the field and fulfil their duty as a "bridge" between government and civil society. There have been many direct refusals to provide up-to-date information from the Ministry of Health. Most of the press conferences and briefings went online, and there were specific technical problems with the participation of journalists: glitches, horrible sound, and poor images; important laws were discussed and passed without public participation. As a result, fake news has flourished due to a shortage of up-to-date and reliable information. Usually, the lack of information is filled with speculation, assumptions, and versions when people are anxious. Thus, the reason for fake news is the information gap created by state authorities. Dissemination of fake news, in turn, has led to a severe restriction of freedom of expression, especially on sensitive political issues, in the name of countering inaccurate reporting.

During the Covid-19 pandemic, no new laws relating to freedom of expression and freedom of the press have been passed, apart from the existing law on the dissemination of knowingly false information, Article 274 of the Criminal Code of Kazakhstan[20] (Fremer, 2020). In the case of Kazakhstan, unlike other countries in the region, experts noticed a "relaxation" in the defamation law during the pandemic (Fremer, 2020). In 2020, Parliament moved defamation law from the Criminal Code to the Administrative Code, thus decriminalising the law on disseminating knowingly false information (Fremer, 2020; Kaleeva, 2020). Legal experts have pointed out that "knowingly false information" can be interpreted too broadly. In addition, President Tokayev has ordered the Ministries of Information and Social Development, the General Prosecutor's Office and other government agencies to closely monitor the spread of misleading and provocative reports (Freedom House, 2020).

Nonetheless, with the decriminalisation of defamation, the number of criminal cases against journalists has declined insignificantly. A report by Adil Soz Foundation for OSCE

[20] Article 274 of the Criminal Code of Kazakhstan
https://online.zakon.kz/Document/?doc_id=39772692&pos=3262;-47#pos=3262;-47

shows that 48 criminal charges were recorded in 2019, compared to 41 in the first eight months of 2020 (Kaleeva, 2020). Moreover, the International Freedom of Expression Foundation recorded seven criminal charges and nine civil suits related to exercising the right to freedom of expression in June 2020 alone (Fremer, 2020). According to the Media Law (2019)[21], *"all Internet resources, including websites and pages on social networking platforms, are considered media outlets"*. Thus, the Defamation Law allows the state to restrict all media content through amendments imposing a ban on compromising state security and inciting social, racial, national or religious hatred (Fremer, 2020). The law also provides for civil and criminal penalties for editors, journalists and online users for content that is not derived from official sources. Consequently, it can be argued that under the state of emergency in Kazakhstan, the freedom to express, receive and disseminate information has been unnecessarily restricted. As Minister of Internal Affairs Yerlan Turgumbayev justified it:

> *"The current epidemiological situation in the country is being used by some to attract the attention of the public, while sending out unverified messages, including those of foreign origin…All these reports are unsubstantiated and false and are seen as attempts to destabilise society"* (Kursiv.media, 2020).

The cases of doctor Duman Aitzhanov and civil society activist Alnur Ilyashev most clearly reflect the problem of restricting freedom of expression. In Aitzhanov's case, back in January 2020, the doctor warned his friends about the dangers of the coronavirus and 70 cases of infection in Almaty (IPHR, 2020). As a result, his video message began to be copied and widely shared on social media (IPHR, 2020). Criminal proceedings were brought against him on charges of spreading knowingly false information (IPHR, 2020). A new video message soon appeared in which he publicly denied his previous statements, and shortly after, he was dismissed from his job (IPHR, 2020). Many are convinced that this was done under pressure from the authorities. Alnur Ilyashev was arrested under the same article but during the state of emergency, which carries an increased punishment, resulting in a sentence of three years of restricted freedom and a five-year ban on social activities (IPHR, 2020). Ilyashev expressed his opinion on Nur Otan's incompetence in the fight against the Covid-19 pandemic (IPHR, 2020).

[21] "[About the Media]," Parliament of the Republic of Kazakhstan, amended April 11, 2019, https://egov.kz/cms/ru/law/list/Z990000451.

Another law passed in 2020 restricts reporters' work and limits the media tools journalists can use during court hearings (Fremer, 2020). The essence of the law is that journalists can now only use "permitted" media tools. At the same time, audio, video, and photography during court hearings must be carried out in accordance with the rules of Article 19(7) of the Code (Fremer, 2020). In case of a breach, the offender is charged with contempt of court, and the recordings and photos are banned for further use and dissemination (Fremer, 2020).

Based on the US State Department's 2019 report, government restrictions on public speech and press existed long before the virus:

> "*Although the constitution provides for freedom of speech and freedom of the press, the authorities have restricted freedom of expression and influenced media representatives by a variety of means, including detention, imprisonment, criminal and administrative charges, harassment, application of licensing rules and Internet restrictions*" (US Mission Kazakhstan, 2020, p.16).

At the same time, Fionnuala Ni Aolein, UN Special Rapporteur on the Protection of Human Rights and Fundamental Freedoms while Countering Terrorism, expressed serious concerns about the abuse of counter-terrorism and extremism legislation as a means to criminalise, suppress, and silence the activities of civil society (US Mission Kazakhstan, 2021):

> "*Peaceful criticism of government policies can, in fact, constitute a criminal offence, as extremism and terrorism provisions are used to criminalise the peaceful exercise of the right to freedom of expression and thought, which is unacceptable in a society where the rule of law and human rights principles and obligations are respected*" (US Mission Kazakhstan, 2021, p.16).

Even if freedom of speech had been suppressed long before, no doubt the Covid-19 pandemic gave the authorities more power to suppress opposition voices under the pretext of protecting the public from fakes and the spread of the virus. This is reflected in the fact that although the state of emergency officially ended in Kazakhstan on May 11, 2020, the authorities continued to prosecute and charge citizens, activists, and journalists based on breaches of the state of emergency (Ramos, 2021). Furthermore, only in exceptional cases were criminal trials held with the physical presence of parties and the media in the court building

(MPHR, 2020). While, journalists, editors and media workers continue to practice self-censorship to avoid state pressure (US Embassy, 2020). According to Freedom House (2020), from 1 June 2019 to 31 May 2020, at least 80 criminal cases were opened for spreading false information in connection with the Covid-19 pandemic. Violations were documented by the government, which monitored both social media platforms and messaging apps (Freedom House, 2020).

5.1.3. Uzbekistan

Under the authoritarian rule of Islam Karimov, Uzbekistan was on a par with North Korea in terms of political rights and civil liberties, but little has changed since Shavkat Mirziyoyev came to power in 2016 (Terzyan, 2022). Uzbekistan is still an authoritarian regime with a single executive system, where authoritarian practices shape the policy-making behaviour of those in power (Terzyan, 2022). Notwithstanding this, the Uzbek leadership has attempted to make some progressive steps to improve its human rights record and engagement with the outside world, for example, by attempting to implement key aspects of the Western model of addressing human rights issues (Terzyan, 2022). Indicators of Mirziyoyev's progressive steps are releasing imprisoned journalists, unblocking banned news websites, and returning foreign media (Prokscha, 2021). Unfortunately, this implementation continues to encounter strong resistance (Prokscha, 2021).

Therefore, Uzbekistan's hostility towards journalists persists under Mirziyoyev's rule: many media outlets still face obstacles in reporting or struggle to obtain official accreditation, and access to information remains a particular problem (Prokscha, 2021). According to RSF (2022), there are no private television networks in Uzbekistan, and media should work within a clear framework set by the government. As in other countries in the region, most media outlets are controlled by the state, self-censorship is widespread, and journalists are harassed and occasionally detained (HRW, 2020). On the other hand, the state media used an "appropriate" tone to inform people about Covid-19 and presented the steps taken by the government in a positive light, thus avoiding any uncomfortable questions (Glas, 2020).

Uzbekistan is 133rd out of 180 in the RSF rankings for 2022 and has risen 25 places since 2020 (RSF, 2022). A study of the law shows, however, that Uzbekistan has a legal framework and institutions that ensure freedom of expression (Yuldoshev, 2022). This freedom is ensured by the Mass Media Act, the Freedom of Information (Principles and Guarantees) Act, the Transparency in Government and Government Activities Act, and other laws and

regulations. In addition, "*the State guarantees freedom of activity and access to information, the right of ownership of the media and their protection from unlawful decisions by State bodies or the acts or omissions of their officials, as also recognised by the international community*" (Yuldoshev, 2022). Under article 29 of the Constitution, everyone has the right to freedom of thought, speech, and opinion (Constitution of RU)[22]. Meanwhile, under Article 67 of the Constitution, the media are free and exempt from censorship (Constitution of RU)[23]. The enshrinement of these rights in the country's Constitution should be one of the main guarantees of freedom of expression, as it obliges the state to ensure it. Instead, there is a very different picture (Younas, 2021).

There are laws and legislation governing the media (Younas, 2021):

- *On Mass Media,*[24]
- *On the Protection of the Professional Activities of a Journalist,*[25]
- *On Telecommunications,*[26]
- *On Publishing Activities,*[27]
- *On Guarantees and Freedom access to information,*[28]
- *On Advertising,*[29]
- *On Communication.*[30]

Restrictions and penalties on those exercising freedom of religion and belief, as well as basic human rights, such as freedom of expression, have been in place in Uzbekistan for many years and were further tightened by President Islam Karimov in 2016 (Yuldoshev, 2022). Moreover, the Criminal Code of RU contains several provisions that are widely used to prosecute journalists and Internet users: *"prohibitions against threatening the constitutional order (Article 159); inciting ethnic, national, racial or religious hatred (Article 156); production and distribution of materials containing threats to public security and order (Article 244-1); slander (Article 139); insult (Article 140); insulting the president (Article*

[22] Article 29, Constitution of the Republic of Uzbekistan https://constitution.uz/en/clause/index
[23] Article 67, Constitution of the Republic of Uzbekistan https://constitution.uz/en/clause/index
[24] Law of the Republic of Uzbekistan "On Mass Media" accessed at < https://lex.uz/docs/53112
[25] Law of the Republic of Uzbekistan "On the Protection of the Professional Activities of a Journalist" accessed at < http://medialaw.asia/document/-113
[26] Law of the Republic of Uzbekistan "On Telecommunications" accessed at < https://www.lex.uz/acts/33152
[27] Law of the Republic of Uzbekistan "On Publishing Activities" accessed at < https://www.lex.uz/acts/54022
[28] Law of the Republic of Uzbekistan "On Guarantees and Freedom access to information" accessed at < https://www.lex.uz/acts/2118
[29] Law of the Republic of Uzbekistan "On Advertising" accessed at < https://www.lex.uz/acts/1715
[30] Law of the Republic of Uzbekistan "On Communication" accessed at < https://lex.uz/acts/2116

158)" (Freedom House, 2021; Criminal Code of RU). Penalties for offenders include various fines, community service and, in all cases, imprisonment (Fremer, 2020).

The Covid-19 pandemic has made adjustments to this situation. According to the IPHR report (2020), freedom of expression has come under even greater pressure from the authorities in an attempt to suppress media criticising their actions for preventing the spread of the Covid-19 pandemic on the grounds that it may cause public panic. For example, in March 2020, new articles for "disseminating false information about the spread of Covid-19 and other dangerous infectious diseases" were introduced into the Criminal Code, with heavy fines or imprisonment for up to three years in case of violation (Fremer, 2020; Freedom House, 2020).

Even before the law on fake news was introduced, the Ministry of Internal Affairs, the Prosecutor General's Office, and other competent agencies set up a group to prevent the dissemination of news about the pandemic (Fremer, 2020). The working group identified 33 social media accounts that "misinterpreted the situation in the country, spread false information, caused panic among the population, disrupted the peaceful life of citizens and destabilised the situation" (Fremer, 2020).

The government also introduced harsh public lockdown with restrictions on citizens' movements in March 2020 (HRW, 2020). Also, the government has significantly increased the existing criminal and administrative penalties for violating quarantine in hospitals and refusing medical examination or treatment (HRW, 2020). President justified all these drastic actions stating, "*If we are not heavy-handed, the situation will worsen (...) Japan prevented the rapid spread of the virus. Why? Because of strict orders*" (Terzyan, 2022). Thus, journalists reported daily harassment of media workers and Internet bloggers before and during the Covid-19 pandemic. A number of journalists expressed the view that the security services were using the pandemic to stifle freedom of speech and dissent, despite the president's public statements that the media were an important part of the country's reform process (Terzyan, 2022).

Human rights activists and journalists were prevented from conducting a comprehensive study of the number of people infected and killed by the pandemic because of the authoritarian state of the government and hostility towards civil society and media activities (IPHR, 2020: 15). When the social media discontent over whether the authorities were deliberately underreporting Covid-19 victims began, the State Agency for Information and Mass Communications (AIMC) began to issue a warning policy to state news agencies such as gazeta.uz and podrobno.uz about "serious legal consequences" for reporting on inconsistent

state information and questions regarding official and unofficial data on persons infected (IPHR, 2020, p.15). The AIMC also suggested that the media should refrain from giving "unverified information" that could lead to "negative perceptions of government action" in the fight against the pandemic, which could also have negative consequences (IPHR, 2020, p.15). Therefore, media outlets in Uzbekistan cannot challenge official statistics regarding the Covid-19 pandemic, so they must report only information approved by government sources like the Special Commission and Ministry of Health ((IPHR, 2020).

A prime example of persecution for criticising the authorities during the Covid-19 is the case of blogger Miraziz Bazarov (IPHR, 2020). He complained on Facebook about a lack of transparency about the loans the Asian Development Bank provided to help the country to deal with the pandemic (Matyakubova, 2020; IPHR, 2020, p.13). Similarly, a number of regions have reported that officials from the Sanitary and Epidemiological Welfare Agency are embezzling funds allocated to combat the coronavirus (Matyakubova, 2020). They promised to publish reports, but there is still not enough information on their website about loans and how they are used (Matyakubova, 2020). These demands look justified when one considers that *"attempts to control thoughts and opinions through blocking, filtering, and restricting social media platforms are costing the country $1,559,500 a day, as well as $2,339,250 to block Facebook, Twitter, and Instagram"* (Fremer, 2020, p.51) at a time when the country is battling the pandemic (Matyakubova, 2020).

Another case demonstrates the persecution of an individual. The 43-year-old man was sentenced to 30 days in prison under Article 205 of the Administrative Code for spreading false information about the death of his neighbour due to a coronavirus infection (IPHR, 2020). Moreover, doctors are also subject to pressure if they speak out about problems in the health care system. For instance, the chief doctor of the Tashkent regional infectious diseases hospital, Guljakhon Yuldasheva, was detained for her critical comments in the media (IPHR, 2020). She complained about the lack of necessary medical equipment at the hospital, and the non-payment of promised bonuses for medical staff (IPHR, 2020). As a result, charges were fabricated against her under Article 167(3) (embezzlement on a particularly large scale) and Article 207(2) (malpractice resulting in death) of the Criminal Code (IPHR, 2020: 14).

As of early December 2020, there were eleven physical attacks and digital threats against media workers that were directly linked to their coverage of the Covid-19 pandemic (Narzullayeva, 2021). Taking all this into account, the UK Foreign Policy Centre concluded

that restrictions on freedom of speech, freedom of the press, investigations, bans on coverage of the pandemic and intimidation of media workers are becoming standard practice for the Uzbek government (Fremer, 2020). In protest, independent media, supported by US Ambassador Daniel Rosenblum and the UN and European Union representations in Uzbekistan, issued statements describing the authorities' actions as an attempt to restrict press freedom (IPHR, 2020: 15). Their protest has caused an international backlash. For its part, the AIMC argued strongly that the government has the right to demand compliance by the Uzbek media with national legislation on refraining from fomenting public discontent and tension (IPHR, 2020: 15).

5.1.4. Tajikistan

Tajikistan is the smallest country in the heart of Central Asia, bordering Afghanistan, China, Kyrgyzstan, and Uzbekistan. Tajikistan's political regime, while outwardly democratic, remains essentially authoritarian (Mukim, 2010). It recognises international law as an integral part of national law, and guarantees of freedom of expression are contained in Article 30 of the Constitution: *"everyone is guaranteed freedom of speech, the press, and the right to use the media"* (Constitution of RT[31]). *"Propaganda and agitation inciting social, racial, national, religious, and linguistic enmity and hostility are prohibited. State censorship and persecution for criticism are prohibited"* (Constitution of RT). These words are enshrined:

- in Article 2 *"on the Press and Other Mass Media Act"* (1990)[32]

- in Article 6 *"on the Law on Television and Radio Broadcasting"* (1996)[33].

The laws of the Republic of Tajikistan contain a large number of norms affecting the status of the media:

- *On Information,*[34]
- *On Advertising,*[35]

[31] Constitution of the Republic of Tajikistan https://www.refworld.org/pdfid/3ae6b50910.pdf
[32] The Law of The Republic of Tajikistan "On the Press and Other Mass Media" accessed at < https://www.legislationline.org/ru/documents/id/14361
[33] Law of The Republic of Tajikistan "On Television and Radio Broadcasting" accessed at < http://ncz.tj/content/%C2%A0закон-республики-таджикистан-о-телевидении-и-радиовещании
[34] Law of the Republic of Tadjikistan "On the Right to Access to Information" accessed at < https://medt.tj/documents/main/normativno-pravovie-akti/zakonodatelnie-akti/ru/02513-ru.pdf
[35] Law of the Republic of Tadjikistan "On Advertising" accessed at < http://medialaw.asia/document/-2185

- *On the Right to Access to Information.*[36]

Tajik President Emomali Rahmon reiterates that it is impossible to build a democratic society without freedom of speech and free media (Mukim, 2010). For this reason, Rahmon stresses the following: "*The free operation of the media is one of the main indicators of the development of a democratic society*" (Mukim, 2010). Only interventions officially adopted and approved by those with legislative powers are legitimate (Mukim, 2010).

Despite all this, the country's guarantees of freedom of expression are only sometimes implemented in practice. Tajikistan is ranked 8th out of 100 in Freedom House's global index of freedom of expression and is marked as "not free" (Freedom House, 2022). According to observers and international human rights organisations, citizens' rights are systematically violated, the judiciary lacks independence, and there are severe restrictions on freedom of expression (Freedom House, 2022). In the Universal Periodic Review (UPR) report of 2021, prepared by Article 19 on the situation of freedom of expression, Tajikistan's legal framework on the right to freedom of expression does not comply with international human rights standards, including harmful provisions on defamation, dissemination of false information, freedom of the media and safety of journalists (Article 19, 2021). Thus, Tajikistan regularly blocks online resources, messaging services, and websites of both international and local media, such as Asia-Plus and Radio Ozodi, which try their best to cover the situation in the country from abroad (Article 19, 2021). The blocking mainly occurs in response to criticism of the government on the Internet or following incidents that the Tajik government believes may be reported critically (Article 19, 2021). Intimidation, blackmail, and harassment have been the main reasons why many journalists and bloggers leave the country (Article 19, 2021).

According to Human Rights Watch report, between 2017 and 2019, the country saw more than 80 cases of all kinds of attacks and assaults, physical and otherwise, including cyber-attacks, judicial and economic harassment of journalists (Lobanov, 2020). Furthermore, the complex registration process for new media agencies and the accreditation process for individual journalists effectively hinders the establishment or continuation of media outlets and the censorship of reporters who are critical of the government (Article 19, 2021). Moreover, those journalists who continue their work are under intense pressure from the State National

[36] Law of the Republic of Tadjikistan "On the Right to Access to Information" accessed at < https://medt.tj/documents/main/normativno-pravovie-akti/zakonodatelnie-akti/ru/02513-ru.pdf

Security Committee, which often interrogates activists and media workers and tries to influence their journalistic activities or directly threatens them (Article 19, 2021).

The suppression of media freedom was particularly acute during the current Covid-19 pandemic. Tajikistan was one of the few countries where authorities denied the presence of Covid-19 (Ibbotson, 2020). The authorities, instead of monitoring media reports of the early suspected cases to raise awareness and slow the spread of the virus, refused to take a transparent approach and dismissed the journalists' reports (IPHR, 2020). People were sceptical about the virus until the number of pneumonia cases in the country increased, raising doubts about the authorities to claim that there was no coronavirus in Tajikistan (Radio Ozodi, 2020). They began to express their concern about the rising death rate among people. Since April 2020, more reports of high numbers of Covid-19 cases and deaths have been reported on social and mass media across the country (IPHR, 2020). Such news outlets as ASIA-Plus, Radio Ozodi, Sputnik Tajikistan, and Akhbor.com wrote about these reports, while authorities denied all these stories and insisted that people were dying from pneumonia, tuberculosis, and typhoid fever (IPHR, 2020). Panic broke out in the country. Social media users began counting the number of people who died of “pneumonia” and were buried in violation of national and religious traditions - their bodies left hospitals in closed coffins, and their families were quarantined (Yusufzoda, 2020). Media outlets reporting on the coronavirus have been blocked and accused of inciting public panic. Despite the fear and panic, the government continued to deny the presence of the virus in the country.

Instead of officials and spokespersons, journalists and health workers tried to spread the word about the pandemic to the masses and help people avoid the disease. The case of Abdullo Gurbati, a 23-year-old journalist for the Asia-Plus news agency, who questioned the authorities' position, is a great example (Current Time, 2020). The journalist wrote about problems in the country's medical facilities due to the spread of the coronavirus in Tajikistan and the need for quarantine (Current Time, 2020). He also raised the issue of cancelling the celebration of Nowruz. Consequently, in May, Gurbati was subjected to two attacks for these and other statements he made (Yusufzoda M.,2020; Lobanov V., 2020; Cabar Asia, 2020). For independent journalists in Tajikistan, nothing is surprising or shocking about this case. Physical violence is just one of the many tools that powers use to silence critics. This case differs from all the previous ones in that it has been widely publicised (Yusufzoda M.,2020; Current Time, 2020). Thus, Gurbati can be considered to have fulfilled his aim of publicising the country's situation, revealing the difficult conditions under which journalists must work. Many

organisations and news channels commented on this issue (Yusufzoda M.,2020). Human Rights organisations and the journalistic community, such as Human Rights Watch and The International Federation of Journalists, demanded protection for media workers and called this situation an apparent attack on freedom of expression and journalists' activities in Tajikistan (Yusufzoda M., 2020).

Besides journalists like Gurbati, there were a lot of medical workers who tried to inform citizens and help them to protect themselves (Khamidullina A., 2021). Continuing to work in a climate of fear, medical workers shared this on condition of anonymity. Individual doctors who did try to talk about the coronavirus were intimidated and forced to keep quiet (Khamidullina A., 2021). In an Asia Plus investigation, a doctor, who decided to be anonymous, admitted that he received the first patient with coronavirus-like symptoms on the eve of the Nowruz holiday:

> *"I consulted my colleagues and sent them the CT scan over the Internet. Everyone confirmed that it looked very similar to a coronavirus. Then we sent this picture to colleagues, pulmonologists in Russia, who told us that it was definitely a picture of coronavirus…We had to remain silent before a series of political events took place"* (Khamidullina A., 2021)

On April 24, after a series of publications, the Ministry of Health made an official statement criticising journalists and others for*"escalating the situation, which leads to conflicts and distrust in the Government and the Ministry"* and warned that *"any media outlet, private individual or reporter who publishes incorrect and false information about the coronavirus will be brought to account"* (IPHR, 2020; Article 19, 2020).

The situation quickly changed on the eve of a WHO expert mission to Tajikistan (Article 19, 2020). Finally, on April 30, the Tajik authorities reported the first cases of coronavirus infection, just one day before the WHO mission (WHO, 2020). President Rakhmon gave *"decisive orders and instructions to prevent infectious diseases, especially coronavirus, to implement sanitary and hygienic measures, disinfect streets, avenues, facilities, and residential buildings, and to organise explanatory work among the population to ensure observance of personal hygiene rules and recommendations of medical specialists"* (Article 19, 2020).

According to media outlets, official state recognition of the pandemic has not significantly impacted the country's freedom of speech and access to information (Radio Ozodi, 2020, Current Time, 2020). The concealment of the exact number of infected and the denial of access to information for journalists continued. Moreover, the government continued to accuse the media of spreading information about Covid-19 that "causes panic among the population" (Article 19, 2020). Information on government news agencies like Khovar.tj differs significantly from the nongovernmental media, mainly in such matters as the number of patients and deaths related to Covid-19, rising prices in the markets, shortages of medical equipment and essential goods, and alike (Article 19, 2020; IPHR, 2020). The government denied all of this and did not mention it in government news agencies. Emomali Mirzoev, a spokesman for the Tajik Health Ministry, in an interview with Radio Ozodi, said that the media should publish only "verified information," and only official information should be trusted (Article 19, 2020; IPHR, 2020). Since statistics about Covid-19 remain a monopoly of the Ministry of Health, "verified information" is the information the Ministry has approved.

The growing criticism of the state has been dealt with by "legal means". The amendments to the Code of Administrative Offences have been adopted, and a new provision was introduced (Parliament.tj, 2020), which prohibits the dissemination of false information (Article 19, 2020). The article prohibits:

> "*Dissemination of deliberately false information via means of mass information, Internet or other means of electric communication when dangerous diseases are emerging and spreading or when quarantine-associated limitation measures are being imposed; and Dissemination of untrue statements regarding techniques and methods of protection and other measures adopted to ensure public safety under aforementioned conditions. Penalties include fines for natural and legal persons and administrative arrest of up to 15 days for natural persons"* (Article 19, 2020).

Any information about the coronavirus pandemic that differs from the official information is considered misleading (ACCA, 2020). The media are also obliged to cite only official sources (ACCA, 2020). For example, Khovar.tj news agency reports on meetings and official government statements about Covid-19. However, usually, it is impossible to access links to government websites and the information posted there. The websites need to be fixed - the pages do not load, or information no longer exists. Likewise, links to official ministerial statements and many government media outlets do not work.

5.1.5. Turkmenistan

Turkmenistan remains one of the few repressive authoritarian states that is closed off from the rest of the world, and where political rights and civil liberties are almost entirely absent in practice (IREX, 2022; Amnesty International, 2021; Freedom House, 2021-2022). According to Freedom House (2021), Turkmenistan's position in the freedom rankings fell from 4th to 2nd out of 100, where 100 represents the highest level of freedom, in 2018 and has not changed since then. Moreover, in Reporters Without Borders' press freedom ranking of 2021, Turkmenistan ranks 178th out of 180, the situation is worse only in Eritrea and North Korea (RSF, 2021).

In Turkmenistan, any expression of religious and political views not approved by the government is severely punished (HRW, 2020). Access to information is strictly controlled, and any independent human rights monitoring groups are banned (HRW, 2020). All watchdog organisations have been saying for years that no media freedom exists in Turkmenistan; all print and electronic media are completely under state control; there is almost no access to foreign media in the country, and their local freelance correspondents are subjected to persecution (IREX, 2022; Amnesty International, 2021; Freedom House, 2021-2022; RSF, 2021; HRW, 2020). The explanation for this is that the notions of moral or any other responsibility to society and the journalist's professional duty have been completely superseded by a heightened sense of loyalty to the authorities (Aytakov, 2022). Thus, journalists work for the state and only with the permission of the state, which makes the information people receive very one-sided.

A prime example of this is the "Saparmurat Turkmenbashi Great Centre for Free Creative Writing" (In honour of Turkmenistan's first president Saparmurat Niyazov), a building in the centre of Ashgabat that unites the editorial offices of all the central print media in Turkmenistan (Aytakov, 2022). "A centre for free creativity", in which all journalists are gathered together and put under full control and supervision (Aytakov, 2022). Moreover, the formal proclamation of censorship in Turkmenistan took place in 1992, during the adoption of the "Ten Years of Wellbeing" programme, when Niyazov stated that for this period "*...control of the press, the mass media, would be established*" (Aytakov, 2022). Although Turkmenistan's constitution and other regulations prohibited censorship, Niyazov used the oral law, effectively legalising it, and ten years later, censorship has not been abolished. His successor, Gurbanguly Berdymukhamedov, also enjoyed this right, and the way he deals with the Internet leaves no doubt that the tradition will be continued by his son and also by his successor, Serdar

Berdymukhamedov (Aytakov, 2022). Under Niyazov, a dictatorship was in place with all the trappings of a cult of personality, absence of freedom of speech, suppression of any dissent, the strength of the intelligence services, the constant search for internal and external enemies, and mass repression (Aytakov, 2022). Berdymukhamedov, who replaced Niyazov, briefly improved the situation in the country, but things quickly returned to their previous course (Aytakov, 2022).

The Constitution of Turkmenistan proclaims the right of citizens of Turkmenistan to *"freedom of opinion and expression, and to receive information unless it is a state, official or commercial secret"* (Article 42)[37]. *"Freedom of artistic and scientific creativity"* is constitutionally enshrined, as well as state encouragement of scientific and artistic creativity and dissemination of its results (Article 56)[38]. However, there is no reference in the Constitution regulating the mass media, and the only law "On the press and other media in the Turkmen SSR" was adopted in 1991 (Sherstoboyeva, 2011). International experts believe that the Law needs to be amended to create effective mechanisms to ensure that the above norms are actually enforceable in practice (Sherstoboyeva, 2011). Based on the definition of mass media in the Law, it applies only to traditional media, as well as analogues of existing print and broadcast media. This means that the media requirements do not apply to Internet and audiovisual media (Sherstoboyeva, 2011). It should also be noted that a number of restrictions reflected in the Law on media content, such as the obligation to establish and implement a "media programme of activities", are not consistent with existing international standards (Sherstoboyeva, 2011). Moreover, for the time being, the state is actively monitoring the Internet by purchasing equipment to track Internet activity, reduce Internet tariffs, identify users trying to circumvent blocking through various services, intercept telephone conversations and block Internet messengers and VPNs (HRW, 2020).

Laws on Media in the history of independent Turkmenistan:

- *On Mass Media* dated January, 2013,[39]

[37] Constitution of Turkmenistan, Article 42.
https://constituteproject.org/constitution/Turkmenistan_2016.pdf?lang=en
[38] Constitution of Turkmenistan, Article 56.
https://constituteproject.org/constitution/Turkmenistan_2016.pdf?lang=en
[39] Law of the Republic of Turkmenistan "On Mass Media" accessed at <
http://www.turkmenbusiness.org/content/zakon-turkmenistana-o-sredstvakh-massovoi-informatsii

- *On Advertisement* dated March, 2016,[40]
- *On Television and Radio Broadcasting* dated January, 2018.[41]

The pandemic has brought new difficulties to Turkmen citizens. Due to tight control, no media representative inside the country has been able to inform citizens either about the global pandemic or about the damage Covid-19 is causing to Turkmenistan's population (IREX, 2022). The control is so strong that the state media have refused to use the words "coronavirus" or "Covid-19", and the Turkmen government adamantly maintained that there has never even been a single case of Covid-19 in the country (IREX, 2022; IPHR & TIHR, 2020). The authorities tried to suppress discussion among residents about Covid-19, including by detaining and intimidating people (IPHR & TIHR, 2020). They pressured health care workers, media workers, and independent activists to cover up the Covid-19 outbreak, and threatened them with consequences if cases were leaked (IPHR & TIHR, 2021). For example, an Ashgabat court sentenced Nurgeldy Khalykov to four years in prison, a 26-year-old young man who shared a picture of a WHO representative visiting Turkmenistan to investigate Covid-19 in the country (IPHR & TIHR, 2021). Nurgeldy was convicted on trumped-up fraud charges. Similarly, blogger Murat Dushemov was sentenced to four years in prison for trumped-up charges because he conducted an interview with a doctor from a state clinic, where they talked about the real situation with Covid-19 in the country (Amnesty Int., 2021).

Disinformation for Turkmen state media is just one of the tools they constantly use: information is not based on facts, not provided with sources and not objective, and government agencies act as the only sources of information, greatly distorting the versions of events (IREX, 2022; IPHR & TIHR, 2020). The version usually reads: "*Turkmenistan has a great president who cares for his people and the country is doing well, constantly reaching new heights, and is the envy of the world outside Turkmenistan*" (IREX, 2022). As an example, during Covid-19, the state media actively promoted the methods of combating infectious diseases written in Berdymukhammedov's book on herbal medicines (IREX, 2022). It is worth mentioning that the recommended methods against Covid-19 have not been scientifically proven. In turn,

[40] Law of the Republic of Turkmenistan "On Advertisement" accessed at < https://geography.agency/zakonturkmenistana-o-reklame/
[41] Law of the Republic of Turkmenistan "On television and radio broadcasting" accessed at < https://www.turkmenistan.gov.tm/tk?id=15419

Turkmenistan's main news agency, Turkmenistan Daulet Khabarlar, distorted comments by WHO Regional Director for Europe Hans Kluge, saying that:

> "*Kluge expressed his thanks to Turkmenistan's president "for the proactive approach to building a multilateral partnership and great contribution to the common efforts to combat the spread of a new type of coronavirus infection" and said Turkmenistan occupied a "leading position" in the world in combating Covid-19*" (IREX, 2022).

Moreover, in order ostensibly to "prevent panic" over the pandemic, the authorities took measures that directly contradicted the objective of counteracting the spread of Covid-19: police stopped and intimidated people using masks in the streets, while authorities organised mass events glorifying the regime (IPHR, 2020).

Eventually, despite the policy of denial, authorities implemented a number of measures to protect people from the virus, such as travel restrictions across state borders and quarantine for international arrivals, limited internal migration, and improving citizens' understanding of sanitary issues (IPHR & TIHR, 2020). All this followed after a visit by the WHO, which recommended the Turkmen authorities behave as if there was a virus in the country (Turkmen.news, 2021). Turkmen.news (2021) spent a year gathering information for a report on Covid-19 in Turkmenistan. They concluded that reporting on the real situation in the country and talking to independent media posed a real danger to Turkmenistan's citizens (Turkmen.news, 2021). Therefore, it is not surprising that many people - relatives and colleagues of Covid-positive people and doctors - have refused to talk to the media and international organisations, even on condition of anonymity. During the investigation, the news agency identified 63 people who died of Covid-19 and about a dozen other relatives who confirmed the deaths of their relatives in private conversations but refused to release information for their own safety (Turkmen.news, 2021).

Although any public discontent in Turkmenistan is potential for persecution, there were several spontaneous protests by residents during Covid-19, demanding that the authorities address the problem of rising prices for basic necessities (IPHR & TIHR, 2020). Residents also sought help from foreign dissidents to publish their stories and opinions about their dissatisfaction with the authorities (IPHR & TIHR, 2020). For example, Swedish-based YouTube blogger Khalmurad Soyunov told the Turkmen Initiative for Human Rights (TIHR) that as of mid-April 2020, he had received and published on his channel more than 40 appeals

from Turkmenistan residents (IPHR & TIHR, 2020). Government inaction undermined public confidence - there was no help for people to stay safe in such a time of crisis, there was no information on how to protect themselves from the virus, food prices rose and public events were held as usual (Hashim et al. 2022). All this has led to an increase in the incidence of the disease in the country, which the government continues to ignore (IPHR & TIHR, 2020). The public and civil society are therefore making their own efforts to prevent mortality in Turkmenistan, with the help of the WHO and the UN agency, which are helping to provide humanitarian supplies to medical facilities in the region (Hashim et al. 2022). This reflects the fact that civil society in Turkmenistan has begun to take a more proactive stance and has so far fulfilled the government's responsibility to inform and educate the population about the Covid-19 pandemic to the best of its ability in the face of fear and repression.

5.2.Discussion

Drawing from what the literature review and case studies demonstrated, regardless of political systems, the worldwide response to the Covid-19 pandemic was characterised by a policy of securitisation of the virus, with countries presenting it as an existential threat requiring urgent measures (Barcelo et al., 2022; Grasse et al.; 2020; O'Casey, 2022). The study found that discourse can act as a powerful mechanism in the political sphere, especially when it comes to security issues. This is based on the notion that reality is not constructed by language but rather shaped by people's perceptions of it (McDonald, 2009). For example, UN Secretary-General António Guterres and World Health Organization (WHO) Director-General Tedros Adhanom both have stressed the importance of taking emergency measures (Duarte et al., 2021). Citing António Guterres's saying, "*the world faces its gravest test, which poses a significant threat to the maintenance of international peace and security*," and Tedros Adhanom using a war metaphor for describing the threat coming from a health crisis, scientists and professionals further contributed to the development of the security discourse in this matter (Duarte et al., 2021). In the case of Central Asia, existing regional tensions, including securitisation of borders and territorial disputes, water and environmental problems characterise these countries (Seifert, 2012). **All these inter-regional and domestic tensions, as well as the region's political systems dominated by authoritarian governance models (Seifert, 2012), suggest that the countries of Central Asia can be classified as systems where securitisation policies are particularly beneficial in times of crisis and commonly used by the state to combat domestic dissent (Barcelo et al., 2022).**

Firstly, it was necessary to see whether there was securitisation in Central Asian countries, namely securitisation of health issues during the Covid-19 pandemic. As a reminder, securitisation is not only a speech act but also a related political process that affects the adoption of laws related to tradition, freedom of conscience, religious association, civil society organisations, political parties and security policies (Buzan et al., 1998). Securitisation involves three main components: 1) **a securitising actor/ agent**, 2) **securitising move**, 3) **an audience** (Buzan et al., 1998). We can also add the fourth component "**an object of securitisation"** (Buzan et al., 1998). The theory understands security not as a real state of affairs but as a discursive practice aimed at changing political priorities. As the literature review shows, the presence of securitisation in the post-Soviet states, especially in the authoritarian regimes under study, is common in many areas - e.g., securitisation of terrorism, extremism, water issues, etc. (Lemon & Antonov, 2020). In many cases, political repression in Central Asia is largely presented as a necessity linked to threats to political, social and military security rather than as an action prompted by the personal position of the ruling elite (O'Casey, 2022).

Most studies reviewed look at the current situation of political implications caused by Covid-19 in Central Asia through the prism of the legal framework, authoritarianism, remnants of the Soviet legacy, and trends to securitise problems (Allison & Graham, 2011). The studies answer the question of why countries in the region tend to use securitisation techniques and ignore laws, attributing this to the Soviet legacy in terms of governance mechanisms and regulations, as well as the failed transition period following the collapse of the USSR, resulting in authoritarian rule in the region. However, there is a dearth of research on attempts by Central Asian governments to use the pandemic as a tool to suppress internal dissent (consolidate power by amending the constitution).

Despite Omelicheva and Markowitz's (2022) assertion that there is no evidence of the securitisation of disease in Central Asia, the case studies show just the opposite, especially through the discursive analysis of media reports and official statements. Following WHO recommendations, some Central Asian countries have made the fight against the pandemic their number one priority, and others have chosen politics of denial (Ibbotson, 2020; Gleason et al., 2020). For example, the presidents of Kyrgyzstan, Kazakhstan, and Uzbekistan declared a state of emergency, while Tajikistan and Turkmenistan fought against any mention of the virus in the media (Ibbotson, 2020).

Consequently, some countries of Central Asia (Kyrgyzstan, Kazakhstan, Uzbekistan) agreed with the WHO statement calling Covid-19 an "existential threat". The paramilitary response (street patrols and quarantine enforcement) to the health crisis in Kazakhstan, Kyrgyzstan and Uzbekistan and the active presence of security officers created a sense of urgency and threat (O'Casey, 2022). Case studies show that the term "security" has often been applied to "human life" and "health", thereby influencing people's perceptions of the problem and enabling those in power to exploit the situation **by securitising health crises**. Denial policies in Tajikistan and Turkmenistan could also be subsumed under the securitisation methods. Any mention of the extent of the virus or criticism of the Tajik government is severely punished. **This is justified on the grounds that information about Covid-19 "increases mistrust of government" and "causes confusion among the population", threatening the well-being and safety of citizens (**Terzyan A., 2022; MPI, 2021)**.** In Turkmenistan, this is expressed through a ban on the use of the word "coronavirus". Buzan, Wæver, and de Wilde (1998) describe these policies as a **"securitising move"** that allows governments to use securitising methods without citizens' approval and avoid political debate. It can therefore be concluded that in Central Asian countries, with the exception of Turkmenistan, Covid-19 is socially constructed as a security threat by **political actors** – those who have the power to influence the minds and actions of groups. The system of government in Turkmenistan and the power wielded by the president do not require securitisation methods to cover up or justify his actions. Total control and the absence of political opponents as a result of harsh measures give the authorities complete freedom to run the state as they wish (IREX, 2022).

Thus, it is clear from the above analysis that the four components of securitisation are met (except in Turkmenistan):

- There are **actors** who influences the perception of the audience, who already have excessive restrictions on their rights by the state.
- Through political discourse, the health crisis is securitised, making it a priority and giving "free rein" to the authorities – **the object of securitisation**.
- The **audience** accepts measures and restrictions during the pandemic, whether it is the imposition of an emergency or the government's failure to acknowledge the presence of the virus.

- There is an issue (pandemic) that is presented as an "existential threat" or a threat to citizens' security, which requires securitisation techniques to deal with – **the securitising move**. (See figure 2)

Figure 2. Securitising approach to measures against Covid-19						
			Kyrgyzstan	***Kazakhstan***	***Uzbekistan***	***Tajikistan***	***Turkmenistan***
A securitizing actor/agent	*Speech acts by presidents and politicians*		***yes***	***yes***	***yes***	***yes***	***yes***
Securitising Move	*Containment and closure policies*		***yes***	***yes***	***yes***	***limited***	***limited***
	Economic policies	*Income support*	***limited***	***yes***	***yes***	***limited***	***no***
		Foreign aid	***yes***	***yes***	***yes***	***yes***	***yes***
	Emergency situation		***yes***	***yes***	***yes***	***no***	***no***
An object that has been identified as potentially harmful *(Securitisation of Health Crisis)*	*Covid-19 as an "existential threat"*		***yes***	***yes***	***yes***	***limited***	***no***

**yes – wide national measures; *limited – limited set of measures in size and extent; *no – no policy response*

For authoritarian systems where people already perceive infringements of rights as the norm, steps to ensure security during emergencies can be used as methods of consolidating

power and control (Lemon & Antonov, 2020). Thus, as the case studies revealed, these countries, under the pretext of **"protecting the population"** and **"preventing panic"** during the time of the pandemic, introduced some amendments to the law which were deemed excessive and contrary to both domestic and international human rights standards on freedom of expression and access to information. These laws were meant to be used to combat disinformation about Covid-19. However, as seen in practice, they were not always used as intended.

Therefore, the second main aim of the study was to examine which laws were applied and whether these laws were legitimate and properly used as proclaimed. This work does not deny the existence of disinformation, which is detrimental to people in times of crisis like this one. During Covid-19's time, many people fell victim to misinformation due to both a lack of open information and the vast amount of available information (Amnesty Int., 2021). This has led to the need to regulate information online, in the news and on TV. However, as van Dijk (2015) and Buzan and Wæver (1998) predicted, the dominant group or influential political actors used this situation by controlling media, justifying censorship, and getting rid of political rivals and critics. The legitimisation of the laws was done by appealing to emotions, as every audience had experienced fear and trauma from the pandemic in some form, which the speaker could exploit (Buzan and Wæver, 1998).

Based on the analysis, it can be concluded that deliberately withheld information about the virus led to an increase in disease incidence in countries (Tajikistan and Turkmenistan), while active measures against the virus led to some inconsistencies with fundamental human rights during the emergency situation (Kyrgyzstan, Kazakhstan, Uzbekistan). This led to a disproportionate response to criticism of authorities in social media by law enforcement. A critical discourse analysis of existing and enacted laws during the pandemic answered the study's second major question: What laws regulating freedom of expression and access to information have been adopted/exist in Central Asian states in the context of the pandemic? (See figure 3).

Figure 3. Laws against (false) inaccurate information

Country	***Law***	***Reason (Restricting Freedom of Expression in the Name of Safety)***

Kyrgyzstan	"The Law on Protection from Inaccurate (False) Information"	*"No one is protected from false information, so the state must protect the honour and dignity of its citizens.* ***The law seeks to limit interference in privacy and protect human rights****" - Member of Parliament Gulshat Asylbayeva (Tagaev, 2021)*
Kazakhstan	"The Law on Disseminating Knowingly False Information"	*"The current epidemiological situation in the country is being used by some to attract the attention of the public, while sending out unverified messages, including those of foreign origin…****All these reports are unsubstantiated and false and are seen as attempts to destabilise society****." - Minister of Internal Affairs Yerlan Turgumbayev (Kursiv.media, 2020*)
Uzbekistan	"Articles for Spreading False Information" in the Criminal and Administrative Codes	*"****To prevent unwarranted panic among the population, ensure public safety and create conditions for the normal functioning of state structures****" - Shavkat Mirziyoyev (Lemon & Antonov, 2020)*
Tajikistan	"The Law on Dissemination of False Information" in the Administrative Codes	"*…Dissemination of untrue statements regarding techniques and methods of protection and other measures adopted* ***to ensure public safety*** *under aforementioned conditions…" - Article 374(1) (Article 19, 2020)*
Turkmenistan	-	-

Regarding the third question, in order to determine the sincerity of the securitising actors' intentions, these laws and their application were examined to see whether the actor intended to achieve a just objective or use them as a pretext to achieve some abusive goals. The government's intentions are already clear from the first use of legislation issued to combat misinformation about Covid-19, which followed several securitising speech acts, as presented in the analysis of the second research question. So, although the constitutions of the Central Asian countries provide for freedom of the press, discourse analyses of reports and international organisations reviews reveal a strong restriction on independent media and that most of the media sector is state-controlled. The pandemic has made it possible for governments to formally use legislation under the rhetoric of the need for security in times of crisis to shut down the independent press, introduce an atmosphere of censorship and self-censorship, and persecute people who are directly critical of governments (Amnesty Int., 2021).

Rajat Khosla, senior director for research advocacy and policy of Amnesty International, describes this situation saying that:

> "*throughout the pandemic, governments have launched an unprecedented attack on freedom of expression, severely curtailing peoples rights. In the midst of a pandemic, journalists and health professionals have been silenced and imprisoned. Communication channels have been targeted, social media has been censored, and media outlets have been closed down – having a dire impact on the public's ability to access vital information about how to deal with Covid-19. Approximately five million people have lost their lives to Covid-19, and lack of information will have likely been a contributory factor."* (Amnesty Int., 2021).

The international community's concerns about the vague wording of laws restricting the spread of false information have been justified. **Media laws are not used as protectors of people's and journalists' rights but as tools to target and punish criticism and dissent. This is demonstrated by the examples of journalists' persecution in the countries of the region**. The lack of media freedom is also demonstrated in the press freedom rankings of Reporters Without Borders (2022), where almost the entire region is in the bottom half of the list (see Figure 4).

Figure 4. Press freedom ranking 2022		
Country	Ranking	Points*
Kyrgyzstan	72	64,21
Kazakhstan	122	48,28
Uzbekistan	133	45,74
Tajikistan	152	40,26
Tyrkmenistan	177	25,0

*Source: Reporters Without Borders (2022) *The higher the score, the more press freedom*

Thirdly, a discourse analysis of the countries' constitutions and the measures adopted showed that the regulations restricting freedom of expression and speech were excessive and went beyond what was permissible (MPI, 2021). The adopted media laws in the constitutions of Central Asian countries have long provided rules and regulations for the effective functioning of the media, both traditional and new methods of information dissemination (MPI, 2021). Furthermore, no legal acts provide for the limitations and restrictions of media activities unless in the name of the protection of public order, the protection of the rights and freedoms of others, national security, public health and morals (MPI, 2021; OHCHR, 1966). Although many countries recognised Covid-19 as a threat to national security and public health, most governments in the world did not hinder the work of journalists and the media and recognised their crucial role in providing essential information to help contain the crisis. Nevertheless, Central Asia is on the list of countries that have enacted or amended their laws to impose excessive measures that create obstacles preventing the media from reporting on the growing number of cases and the shortcomings of the official response (RSF, 2022). The reasons for introducing media laws are demonstrated in Figure 3.

The Reporters Without Borders' comparison of the state of freedom of expression in the countries of the region from 2019 to 2022 shows an improvement (see Figure 5). Yet have there really been improvements? Could these improvements be due to the deterioration of freedom of speech in other countries? The new ranking is questionable because the Reporters Without Borders 2021 round-up claimed that there had never been such a large number of detained journalists in the world before (RSF, 2021). As of December 2021, the total number of journalists imprisoned was 488 - a 20% increase in one year (RSF, 2021), while the number

in 2020 was 387, which is also 12% higher than in 2019 (RSF, 2020). In 2022 the record was broken again – the total number of imprisoned journalists is 533 – up 13.4% (RSF, 2022). RSF's survey data include professional journalists, non-professional journalists and media workers (RSF, 2022). A review of abuse and violence committed against journalists by the RSF is based on data from which it is clear that every death, detention or abduction of a journalist has been a direct result of journalistic work (RSF, 2022). However, it should also be borne in mind that not all cases involving journalists can be considered and included in the RSF's round-up. Thus, RSF's Barometer of journalists abused in Central Asia from 2019 to 2022 consists only of 23 results, with no victims in Kyrgyzstan, 5 in Kazakhstan, 9 in Tajikistan, 8 in Uzbekistan, and only 1 in Turkmenistan (RSF, 2022). At the same time, an analysis of violations of journalists' rights in the case studies shows a number far in excess of those reported by RSF.

Figure 5. Freedom of expression in Central Asian countries during 2019-2022

	2022	**2021**	**2020**	**2019**
Kyrgyzstan	72	79	82	83
Kazakhstan	122	155	157	158
Uzbekistan	133	157	156	160
Tajikistan	152	162	161	161
Turkmenistan	177	178	179	180

Source: Reporters Without Borders (2022)

Conclusion

By conducting an analysis of the discourse presented in the paper in the quest for the legitimisation of the excessive measures taken against Covid-19 in Central Asian countries, this study intends to be useful in the fields of International Relations and Security Studies. It also seeks to contribute to regional research in the context of the pandemic. The thesis provides a comprehensive literature review of the concepts of securitisation and critical discourse analysis articulated by scholars representing these theories. By broadening the scope of securitisation, the Copenhagen School encourages researchers to identify new securitisation moves under different circumstances and in different areas. The author therefore also hopes that this paper will contribute to a broader understanding and use of securitisation in the Central Asian region

The research questions were answered by analysing secondary data gathered. Regarding the first research question, "Has a securitised approach been adopted in the measures against Covid-19 in Central Asia?" the author concluded that despite denial by some academics, the health crisis has led to the application of securitisation in some areas. Also, the acceptance of these actions by large parts of society or the absence of political opponents and representatives of society to express and defend public opinion has led to restrictions and violations of human rights in areas such as freedom of expression, freedom of speech, freedom of association, freedom of the press, the right to peaceful assembly, and alike. In Central Asia, authoritarian rule became more evident during this period. No matter how hard they try to present themselves as countries aiming to democratise their policies to the international community, the pandemic has shown that authoritarian processes are strongly prevalent in the region. **The pandemic has led to a surge in authoritarian processes, allowing states to act in their interests under the guise of a global fight against the "existential threat."**

This paper looks at these processes from a legal perspective, namely how freedom of speech and expression has suffered in Central Asian countries and what common practices and reasons for this have been found in the region. The change of policy in the countries of Central Asia (except Turkmenistan) means that certain rights of citizens were limited. In Turkmenistan, such tendencies existed before Covid-19, where the president's power is unlimited, and his decisions require no explanation or justification. Similar situation in Tajikistan, but with more room for social participation in politics. In countries of Central Asia (except Turkmenistan), the deterioration of already poor working conditions for journalists, such as restrictions on journalists' work, harassment and punishment for speaking the truth, denial of accreditation,

harassment and threats to their families, closures of independent media, control of state media, self-censorship and other abuses were the most critical consequences of securitisation against the background of Covid-19, which led to the strengthening of state power and the removal of political opponents. It answers the second and third questions of the research, "What policies contrary to freedom of expression are in place in the Central Asian states?" and "Do these measures constitute excessive and beyond to what is permissible?"

Discourse analysis showed that there is a similar tendency in the countries of the region to defend such changes - more clearly expressed by the President of Uzbekistan, whose wording can be applied to the whole region: "*To prevent unwarranted panic among the population, ensure public safety and create conditions for the normal functioning of state structures*" (Lemon & Antonov, 2020). When it comes to comparing the imposed restrictions and constitutional rights of citizens - especially of journalists - admittedly, this is not a new trend in Central Asian countries to restrict or disregard the laws they have adopted. The reason is that we cannot call these countries democracies that follow democratic processes, even fundamental ones such as free elections. Moreover, some studies show that the extent to which people accept the current securitisation rhetoric is a consequence of the historical memory of the Soviet Union, its legacy and its influence on people's perceptions of power, while the authorities use this situation to achieve their political and economic ambitions.

In essence, the research and its method revealed the hidden aspects of political discourse - identifying opportunities for abuse of power. To summarise, the study of securitisation policies in Central Asian countries during the Covid-19 period has confirmed Barcelo et al.'s (2022) claim that "*governments with underlying incentives to oppress their citizens can take advantage of the global health crisis to increase repressive measures to control dissidents at home.*"

Furthermore, the study reveals that some solutions used in the fight against the pandemic can be protracted and create long-lasting or permanent problems. While some restrictions, such as travel restrictions, quarantine, and mandatory wearing of masks in public places have had a short-term effect, others have a lasting effect - such as continued restrictions on publications and speech, blocking of Internet resources, and violation of journalists' rights. The author, therefore, argues that these changes will have social consequences in the future due to the vagueness of the laws. Thus, the problem of the application of the "fake news" law and the extent of its use over time remains unresolved. The issue of violations of the rights of

free media and individual journalists in the region has recently been increasingly raised by international and local organisations. In addition to the findings of this study, it would be interesting to explore the further impact of securitisation processes during the Covid-19 pandemic on media development in Central Asia in the years following the pandemic.

Bibliography

1. ACCA (2020). Tajikistan: new law will allow to punish citizens for the truth. Retrieved from https://acca.media/en/tajikistan-new-law-will-allow-to-punish-citizens-for-the-truth/
2. Akhunov, A. M. (2020, March 28). The COVID-19 Pandemic as a Challenge for Post-Soviet Central Asia Countries. *Journal of International Analytics*, *11*(1), 114–128. https://doi.org/10.46272/2587-8476-2020-11-1-114-128
3. Allison, O., & Graham, N. A. (2011). Loyalty in the New Authoritarian Model: Journalistic Rights and Duties in Central Asian Media Law. In E. Freedman & R. Shafer (Eds.), *After the Czars and Commissars: Journalism in Authoritarian Post-Soviet Central Asia* (pp. 143–160). Michigan State University Press. Retrieved from http://www.jstor.org/stable/10.14321/j.ctt7ztd46.10
4. Amoussou, Ayodele A. Allagbe (2018). Principles, Theories and Approaches to Critical Discourse Analysis. *International Journal on Studies in English Language and Literature (IJSELL)*, vol 6, no. 1, pp. 11-18. doi: http://dx.doi.org/10.20431/2347-3134.0601002
5. Amnesty International (2021). Covid-19: Global attack on freedom of expression is having a dangerous impact on public health crisis. Retrieved from https://www.amnesty.org/en/latest/news/2021/10/covid-19-global-attack-on-freedom-of-expression-is-having-a-dangerous-impact-on-public-health-crisis/
6. Amnesty International (2021). Turkmenistan 2021. Retrieved https://www.amnesty.org/en/location/europe-and-central-asia/turkmenistan/report-turkmenistan/
7. Amnesty International (2021). Silenced and Misinformed: Freedom of Expression in Danger During Covid-19. Retrieved from https://www.amnesty.org/en/wp-content/uploads/2021/11/POL3047512021ENGLISH.pdf
8. Ang, B., Anwar, N.D., Jayakumar, S. (2021). Disinformation & Fake News: Meanings, Present, Future. In: Jayakumar, S., Ang, B., Anwar, N.D. (eds) Disinformation and Fake News. Palgrave Macmillan, Singapore. https://doi.org/10.1007/978-981-15-5876-4_1
9. Auelbayev B. (2021). The Countries of Central Asia during the Covid-19 Pandemic in 2020: View from Kazakhstan. *Central Asian Affairs: Quarterly Analytical Review*. doi.org/10.52536/CAA

10. Aytakov, S. (2022). For Democracy and Human Rights in Turkmenistan: The Press under Totalitarianism. Gundogar. http://www.gundogar.org/?02450520495000000000000011000000

11. Balakrishnan V. S. (2020). Covid-19 response in central Asia. *Elsevier Ltd.* Retrieved from www.thelancet.com/

12. Baele S. (2020). On the Securitization of Covid-19. *PandemiPolitics, Polemics on pandemics*. University of Exeter. Retrieved from https://pandemipolitics.net/baele/

13. Barceló, J., Kubinec, R., Cheng, C., Rahn, T. H., & Messerschmidt, L. (2022). Windows of repression: Using Covid -19 policies against political dissidents? *Journal of Peace Research*, 59(1), 73–89. https://doi.org/10.1177/00223433211062389

14. Betti, Mohammed Jasim. (2021). Discourse Analysis and Text Linguistics. 10.13140/RG.2.2.25544.24325

15. Brannen S., Habiba A. & Newton H. (2020). Covid-19 Reshapes the Future. *Center for Strategic and International Studies (CSIS)*. Retrieved from http://www.jstor.org/stable/resrep25198.

16. Buzan, B, Wæver, O, de Wilde, J. (1998). Security: A New Framework for Analysis. *Lynne Rienner Publishers*, pp. 1-239

17. Buzan, B., & Wæver, O. (2003). Security complexes: A theory of regional security. In Regions and Powers: The Structure of International Security (Cambridge Studies in International Relations, pp. 40-82). *Cambridge: Cambridge University Press*. doi:10.1017/CBO9780511491252.007

18. Buzan, B. (2003). Regional Security Complex Theory in the Post-Cold War World. In: Söderbaum, F., Shaw, T M. (eds) Theories of New Regionalism. International Political Economy Series. *Palgrave Macmillan, London*. https://doi.org/10.1057/9781403938794_8

19. Distler, W. (2021). The Governing of (In)Security. Politics and Securitisation in the Asian Context. *Arnold Bergstraesser Institute*, 52(1-2), 5-15. https://doi.org/10.11588/iqas.2021.1-2.14219

20. Duarte E. D. (2021). Securitising Covid-19? The Politics of Global Health and the Limits of the Copenhagen School. *Contexto Internacional*, 43(2). https://doi.org/10.1590/S0102-8529.2019430200001

21. Eroukhmanoff, C. (2017). Securitization Theory. In McGlinchey S., Walters R. & Scheinpflug C. (Eds.). *International Relations Theory*, pp. 104-110.

22. Eves, L, Thedham, J. (2020). Applying Securitization's Second Generation to Covid - 19. *E-International Relations*. Retrieved from https://www.e-ir.info/2020/05/14/applying-securitizations-second-generation-to-covid-19/
23. Fairclough, Norman (2001). Research Methods, Introducing Qualitative Methods. *Methods of Critical Discourse Analysis*. SAGE Publications. doi: https://dx.doi.org/10.4135/9780857028020
24. Floyd, R. (2007). Towards a Consequentialist Evaluation of Security: Bringing Together the Copenhagen and the Welsh Schools of Security Studies. *Review of International Studies*, 33(2), 327–350. http://www.jstor.org/stable/40072168
25. Frantz S.F. (2003). In Defense of Critical Discourse Analysis. *Columbia University Libraries*, vol 3, no. 2. https://doi.org/10.7916/salt.v3i2.1628
26. Freedman, E. , Shafer, R. , & Antonova, S. (2010). Two decades of repression: the persistence of authoritarian controls on the mass media in Central Asia. *Central Asia and the Caucasus*, 11 (4), 94-110.
27. Freedman, E., & Shafer, R. (Eds.). (2011). *After the czars and commissars : Journalism in authoritarian post-soviet central asia*. Michigan State University Press.
28. Fremer I. (2020). Post-Soviet States. *Freedom of Expression during* Covid -*19*. The Law Library of Congresss, Global Legal Research Directorate.
29. Freedom House (2021). Turkmenistan: Freedom in the World 2021 Country Report. *Freedom House*. Retrieved from https://freedomhouse.org/country/turkmenistan/freedom-world/2021
30. Freedom House (2022). Democracy Status. Retrieved from https://freedomhouse.org/explore-the-map?type=nit&year=2021
31. Freedom House (2022). Countries and Territories. Retrieved from https://freedomhouse.org/countries/freedom-world/scores
32. Freedom House (2022). Turkmenistan: Freedom in the World 2022 Country Report. *Freedom House.* Retrieved from https://freedomhouse.org/country/turkmenistan/freedom-world/2022
33. Glas O. (2020). Central Asia: Coronavirus and the media. *European Journalism Observatory*. Retrieved from https://en.ejo.ch/ethics-quality/central-asia-coronavirus-and-the-media
34. Gleason G. & Baizakova K. (2020). Covid-19 in the Central Asian Region: National Responses and Regional Implications. Connections 19, no. 2, 101–14. Retrieved from https://www.jstor.org/stable/26937613

35. Gozdecka, D. A. (2021, July 3). Human Rights During the Pandemic: COVID-19 and Securitisation of Health. *Nordic Journal of Human Rights*, *39*(3), 205–223. https://doi.org/10.1080/18918131.2021.1965367
36. Grasse, D, Pavlik, M, Matfess, H, Curtice, T. (2020). Opportunistic Repression: Patterns of civilian targeting by the state in response to Covid -19. https://www.dropbox.com/s/xwgys9qb7ms8z2a/public_health_repression.pdf?dl=0
37. Griffen, S. (2021). Covid reports cause trouble. *British Journalism Review*, *32*(1), 61–65. https://doi.org/10.1177/0956474821998998
38. Harris, Zellig S. (1952). Discourse Analysis. *Language*, vol. 28, no. 1, 1952, pp. 1–30. https://doi.org/10.2307/409987
39. Hashim, H.T., El Rassoul, A.E.A., Bchara, J. et al. (2022). Covid -19 denial in Turkmenistan veiling the real situation. *Arch Public Health,* 80, 8. Retrieved from https://doi.org/10.1186/s13690-021-00779-x
40. Heymann, D L, Chen, L, Takemi, K, Fidler, D P, et al. (2015). Global health security: the wider lessons from the West African Ebola virus disease epidemic. *The Lancet*, 385(9980), pp. 1884–901.
41. Hug A. (2021). Introduction: How Rights Disappear in Tajikistan. *The Foreign Policy Centre*. Retrieved from https://fpc.org.uk/
42. Human Rights Watch (2020). Turkmenistan: Sobytiya 2019 goda (Turkmenistan: Events of 2019). *HRW*. Retrieved https://www.hrw.org/ru/world-report/2020/country-chapters/336562
43. Ibbotson S. (2020). Covid-19: Approaches, Outlooks, And Power Dynamics In Central Asia. *Asian Affairs*. 51:3, 528-541, DOI: 10.1080/03068374.2020.1805891
44. Inform Buro (2021). V Kazakhstane s nachala pandemii zaveli 104 ugolovnykh dela po rasprostraneniyu feykov, 87 iz nikh prekrashcheno (Since the beginning of the pandemic, 104 criminal cases on the spread of fakes have been opened in Kazakhstan, 87 of them have been terminated). Retrieved from https://informburo.kz/
45. Ionova E. P. (2020). Tsentral'naya Aziya V Kontekste Pandemii (Central Asia In The Context Of A Pandemic). *Russia And The New States Of Eurasia*, Vol 2(47). doi:10.20542/2073-4786-2020-2-81-93
46. IPHR & TIHR (2020). Government Responds to Covid -19 and Hurricane with Denial, Cover-Ups and Intimidation Tactics. *CIVICUS Monitor*. Retrieved from https://monitor.civicus.org/updates/2020/06/08/government-responds-covid-19-and-hurricane-denial-cover-ups-and-intimidation-tactics/

47. IPHR & TIHR (2021). Turkmenistan: New Internet Restrictions, New Cases of Persecution of Outspoken Activists. *CIVICUS Monitor*. Retrieved from https://monitor.civicus.org/updates/2021/05/03/turkmenistan-new-internet-restrictions-new-cases-persecution-outspoken-activists/
48. IPHR (2020). It Came with the Wind… – Turkmenistan's Covid-19 Response Marked by Denial, Ludicrous Explanations and Attempts to Cover up the Truth. *IPHROnline*. Retrieved from https://www.iphronline.org/it-came-with-the-wind-turkmenistan-s-covid-19-response.html
49. IREX & USAID (2022). Turkmenistan. Vibrant Information Barometer 2022. IREX, 2022. https://www.irex.org/VIBE_2022_Turkmenistan
50. Janks, H. (1997, December). Critical Discourse Analysis as a Research Tool. *Discourse: Studies in the Cultural Politics of Education*, *18*(3), 329–342. https://doi.org/10.1080/0159630970180302
51. Kamalu, Ikenna & Osisanwo, Ayo. (2015). DISCOURSE ANALYSIS. Retrieved from https://www.researchgate.net/publication/343214812_DISCOURSE_ANALYSIS
52. Khramova T. (2020). The Challenges of The Pandemic: Restrictions of Freedoms of Assembly And Speech In The Light of The Proportionality Principle. *Comparative Constitutional Review.* Academia.edu
53. King E. J. & Jones P. (2021). Covid -19 RESPONSE IN CENTRAL ASIA: A Cautionary Tale. *Coronavirus Politics: The Comparative Politics and Policy of COVID-19.* University of Michigan Press.
54. Kurlantzick J. (2021). COVID-19 batters Asia's already-struggling democracies. *The Japan Times.* Retrieved from https://www.japantimes.co.jp/opinion/2021/01/13/commentary/world-commentary/coronavirus-asia-democracies/
55. Kursiv.media (2020). Kazakhstantsam napomnili ob ugolovnoy otvetstvennosti za feyki (Kazakhstanis reminded of criminal liability for fakes). Retrieved from https://kz.kursiv.media/2020-07-09/kazakhstancam-napomnili-ob-ugolovnoy-otvetstvennosti-za-feyki/
56. Kydyrbayev O. (2021). Obraz Sil'nogo Gosudarstva v Media (The image of a strong welfare state in the media), *Kazakhstan and COVID-19: media, culture, politics* (31-47), Friedrich Ebert Foundation in Kazakhstan. Retrieved from https://library.fes.de/pdf-files/bueros/kasachstan/18218.pdf

57. Lemon E. (2018) Critical approaches to security in Central Asia: an introduction, Central Asian Survey, 37:1, 1-12, DOI: 10.1080/02634937.2018.1435760
58. Lemon E., Antonov O. (2020). Covid-19 and the Politics of Authoritarianism in Central Asia. *The Centre for Baltic and East European Studies*, Baltic Worlds. Retrieved from https://balticworlds.com/covid-19-and-the-politics-of-authoritarianism-in-central-asia/
59. Lo Yuk-ping, C, Thomas, N. (2010). How is health a security issue? Politics, responses and issues. *Health Policy and Planning*, 25(6), 447–453. Retrieved from https://academic.oup.com/heapol/article/25/6/447/584995
60. Matyakubova D. (2020). Za Bleskom: Pandemiya i Grazhdanskiye Svobody v Uzbekistane (Beyond Brilliance: Pandemic and Civil Liberties in Uzbekistan). *The Foreign Policy Centre*. Retrieved from https://fpc.org.uk/за-блеском-пандемия-и-гражданские- сво/
61. McDonald, M. (2008). Constructivism. Williams, P, D. Security studies: an introduction. London New York : Routledge. 59-72. 10.4324/9781315228358-4
62. O'Casey E. (2020) Covid-19 and the Surveillance State: A New Pretext For Limiting Personal Freedoms and Dissent in the Post-Soviet Space. *Ukraine Analytica* 03 (21):49-56. https://www.ceeol.com/search/article-detail?id=1025609
63. Omelicheva M.Y. & Markowitz L.P. (2021). Central Asian Responses to Covid -19: Regime Legitimacy and [De]Securitization of the Health Crisis. *Ponars Eurasia*. Retrieved from https://www.ponarseurasia.org/central-asian-responses-to-covid-19/
64. Omelicheva M.Y. & Markowitz L.P. (2022). Covid -19 in Central Asia: (De-)Securitization of a Health Crisis?. *Problems of Post-Communism, Taylor and Francis Online*, 69:1, 92-102, DOI: 10.1080/10758216.2021.2009349
65. Primeminister.kz. (2019). Uzhestocheniye nakazaniya za klevetu v SMI kommentariy MIOR RK. (Tougher penalties for libel in the media - commentary by the IERC). Official information resource of the Prime Minister of the Republic of Kazakhstan Russian. Retrieved from https://www.primeminister.kz/ru/news/uzhestochenie-nakazaniya-za-klevetu-v-smi-kommentariy-ministerstva-informacii-i-obshchestvennogo-razvitiya-rk
66. Prokscha A. (2021). Press struggles to regain strength after decades of repression in Uzbekistan. *International Press Institute*. Retrieved from https://ipi.media/press-struggles-to-regain-strength-after-decades-of-repression-in-uzbekistan/

67. Putz C. (2020) Central Asian States Take on 'False Information'. *The Diplomat*, Central Asia. Retrieved from https://thediplomat.com/2020/06/central-asian-states-take-on-false-information/

68. Putz C. (2020). Death and Denial in Turkmenistan. The Diplomat. Retrieved from https://thediplomat.com/2020/08/death-and-denial-in-turkmenistan/

69. Ramraj, V., & Little, M. (2021). A Short History and Thematic Overview. *Covid-19 in Asia: Law and Policy Contexts*. Oxford University Press.

70. Reporters Without Borders (2020). 2020-Round up: journalists detained, held hostage and missing. RSF, retrieved https://rsf.org/sites/default/files/rsfs_2020_round-up_0.pdf

71. Reporters Without Borders (2021). Turkmenistan. *RSF*. https://rsf.org/en/country/turkmenistan

72. Reporters Without Borders (2021). 2021-Round up: journalists detained, killed, held hostage and missing. RSF, retrieved from https://rsf.org/sites/default/files/rsfroundup_2021.pdf

73. Reporters Without Borders (2022). 2022-Round up: Journalists detained, killed, held hostage and missing. RSF, retrieved from https://rsf.org/sites/default/files/medias/file/2022/12/RSF_Bilan2022_EN.pdf

74. Reporters Without Borders (2022). Barometer - TOTAL OF VICTIMS OF ABUSES. Retrieved from https://rsf.org/en/barometer?exaction_pays_pays=182&exaction_pays_annee=2020&exaction_pays_statut=prison&&exaction_victimes_pays%5B182%5D=182&exaction_victimes_pays%5B183%5D=183&exaction_victimes_pays%5B207%5D=207&exaction_victimes_pays%5B208%5D=208&exaction_victimes_pays%5B194%5D=194&annee_start=2019&annee_end=2022&&&&#exaction-victimes

75. Seifert, A C. (2012). The Political Process in Central Asia and the System Question. *OSCE Yearbook 2011*. doi.org/10.5771/9783845238234

76. Shahbaz A. $ Funk A. (2021) Freedom of the Net 2021: The Global Drive to Control Big Tech. Freedom House. Retrieved from https://freedomhouse.org/report/freedom-net/2021/global-drive-control-big-tech

77. Shafer, R., & GRAHAM, N. A. (2011). Soviet Foundations of the Post-Independence Press in Central Asia. In R. Shafer & E. Freedman (Eds.), *After the Czars and Commissars: Journalism in Authoritarian Post-Soviet Central Asia* (pp. 19–32). *Michigan State University Press*. http://www.jstor.org/stable/10.14321/j.ctt7ztd46.4

78. Sherstoboyeva E. A. (2011). Legal analysis of the Law «On press and other mass media in Turkmen SSR». *Yearbook-13: The OSCE Representative on Freedom of the Media* (183-205). Retrieved from https://publications.hse.ru/chapters/61231145
79. Shipoli, E.A. (2018). The Securitization Theory. In: Islam, Securitization, and US Foreign Policy. *Palgrave Macmillan*, Cham. https://doi.org/10.1007/978-3-319-71111-9_3
80. Shuy, R.W. (2005). Discourse Analysis in the Legal Context. In The Handbook of Discourse Analysis (eds D. Schiffrin, D. Tannen and H.E. Hamilton). https://doi.org/10.1002/9780470753460.ch23
81. Soest C. V. & Stroh A. (2017). Comparisons across World Regions: Managing Conceptual, Methodological, and Practical Challenges. *Comparative Area Studies*, p.79
82. Sriwimon, L., & Zilli, P. J. (2017, May). Applying Critical Discourse Analysis as a conceptual framework for investigating gender stereotypes in political media discourse. *Kasetsart Journal of Social Sciences*, *38*(2), 136–142. https://doi.org/10.1016/j.kjss.2016.04.004
83. Staar, B, C. (2021). How to Treat Your Sworn Enemy: North Korea's Securitisation of the United States. Distler, W. The Governing of (In)Security. *Politics and Securitisation in the Asian Context*, 52(1-2), 79-99. https://doi.org/10.11588/iqas.2021.1-2.14561
84. Stritzel, H. (2014). Securitization Theory and the Copenhagen School. In: Security in Translation. *New Security Challenges Series*. Palgrave Macmillan, London. https://doi.org/10.1057/9781137307576_2
85. Sultan A. (2020). Pandemiya i prava cheloveka: v Kazakhstane rabotayet tol'ko repressivnaya sistema, bol'she nichego ne rabotayet (Pandemic and human rights: only repressive system works in Kazakhstan, nothing else works). *Cabar Asia*. Retrieved from https://cabar.asia/
86. Swedberg, R. (2020). Exploratory Research. In C. Elman, J. Gerring, & J. Mahoney (Eds.), The Production of Knowledge: Enhancing Progress in Social Science, Strategies for Social Inquiry (pp. 17–41). chapter, Cambridge: Cambridge University Press.
87. Christian Von Soest and Alexander Stroh, Comparisons across World Regions: *Managing Conceptual, Methodological, and Practical Challenges*, (Comparative Area Studies, 2018), p.79
88. Tagaev M. (2021). «Bor'ba» s feykami: tot zhe zakon, tol'ko vid sboku (The "fight against fakes": the same law, but from a sideways perspective), Radio Azattyk. Retrieved from https://rus.azattyk.org/a/31333069.html

89. Talant B. (2021). Kyrgyz parliament sneaks through “fake news” law with president’s blessing. *Eurasianet.* Retrieved from https://eurasianet.org/kyrgyz-parliament-sneaks-through-fake-news-law-with-presidents-blessing
90. Taylor, V. (2004). From State Security to Human Security and Gender Justice. Agenda: Empowering Women for Gender Equity, 59, 65–70. http://www.jstor.org/stable/4548116
91. Tokoeva A. (2022). Seks, lozh' i video. Avtora rassledovaniya o rodne glavnogo chekista Kyrgyzstana raneye uzhe izbivali, a teper' reshili sdelat' dragdilerom (Sex, lies and video. The author of the investigation about the relatives of the chief security officer of Kyrgyzstan has already been beaten, and now they decided to make a drug dealer). *Mediazona Central Asia*. Retrieved from https://mediazona.ca/article/2022/02/01/bolot
92. Turkmen.news (2021). SURVIVAL OF THE FITTEST. HOW DO THE OFFICIAL MEDIA REPORT THE PANDEMIC? *Turkmen.news*. Retrieved from https://turkmen.news/wp-content/uploads/2021/07/Coronavirus-in-Turkmenistan-Report.pdf
93. United Nations (2020). Covid-19: Exceptional measures should not be cover for human rights abuses and violations – Bachele. *UN Human Rights*. Retrieved from https://www.ohchr.org/en/statements/2020/04/covid-19-exceptional-measures-should-not-be-cover-human-rights-abuses-and
94. United Nations (2020). ‘Covid -19 has exposed our past mistakes and failures’ says Kazakhstan President. *UN News: Global Perspective Human Stories*. Retrieved from https://news.un.org/en/story/2020/09/1073322
95. United Nations Human Rights Office of the High Commissioner (1966). International Covenant on Civil and Political Rights. Retrieved from https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-civil-and-political-rights
96. van Dijk, T. A. (1993). Principles of critical discourse analysis. *Discourse & Society, 4*(2), 249–283. http://www.jstor.org/stable/42888777
97. van Dijk T. A. (2006). Discourse, context and cognition. Discourse Studies. *SAGE Publications,* Vol 8(1): 159–177. 10.1177/1461445606059565
98. van Dijk T. A. (2008). Discourse and Context. A sociocognitive approach. *Cambridge University Press*. 978-0-511-42320-8

99. Walt, S. M. (1991). The Renaissance of Security Studies. *International Studies Quarterly*, 35(2), 211–239. https://doi.org/10.2307/2600471

100. Wæver, O. (1993). Securitization ans De-securitisation. Security the Speech Act: Analysing the Politics of a Word. *Copenhagen: Centre for Peace and Conflict Research.*

101. Wilkinson, C. (2007). The Copenhagen School on Tour in Kyrgyzstan: Is Securitization Theory Useable Outside Europe? Security Dialogue, 38(1), 5–25. https://doi.org/10.1177/0967010607075964

102. Williams, P, D. (2008). Security studies: an introduction. London New York : Routledge, 1-9. https://www.academia.edu

103. Williams, P.D., & McDonald, M. (Eds.). (2018). Security Studies: An Introduction (3rd ed.). Routledge. https://doi.org/10.4324/9781315228358

104. Wodak, Ruth, and Michael Meyer (2001). *Methods of Critical Discourse Analysis*. doi:10.4135/9780857028020

105. World Bank (2020). World Bank East Asia and Pacific Economic Update, April 2020 : East Asia and Pacific in the Time of Covid-19. Washington, DC: World Bank. https://openknowledge.worldbank.org/handle/10986/33477

106. Worldometer. Covid-19 Coronavirus pandemic. Weekly updates. Worldometer. https://www.worldometers.info/coronavirus/

107. World Press Freedom Index (2021). RSF 2021 Index: No antidote to disinformation, media control virus in Eastern Europe and Central Asia. *Reporters Without Borders*. Retrieved from https://rsf.org/en/rsf-2021-index-no-antidote-disinformation-media-control-virus-eastern-europe-and-central-asia

108. Younas, A. (2021). Summary of Media Laws and Regulations in Central Asia. *SSRN Electronic Journal*. https://doi.org/10.2139/ssrn.3980181

109. Yuldoshev A. (2022). Is the right to freedom of speech fully guaranteed in Uzbekistan? *The Permanent Mission of the Republic of Uzbekistan to the United Nations.* Retrieved from https://www.un.int/uzbekistan/news/right-freedom-speech-fully-guaranteed-uzbekistan

110. Yusufzoda M. (2020). My svedem s toboy schety (We'll get even with you). *Radio Ozodi. Tajikistan.* Retrieved from https://rus.ozodi.org/a/30607139.html

111. Zhiltsov S. (2020). Covid-19: New Challenges For Central Asia." *CA&C Press AB Publishing House (Sweden)*. Retrieved from https://doi.org/10.37178/ca-c.20.4.07