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SOME COMPARISON OF EMPLOYMENT LAW IN UZBEKISTAN AND JAPAN

Аннотация. В данной статье представлен сравнительный анализ трудового законодательства Узбекистана и Японии, с акцентом на ключевые аспекты, такие как рабочее время, минимальная заработная плата и правовые гарантии. Основываясь на законодательных актах, официальной статистике и научной литературе, статья выявляет как сходства, так и различия в нормативно-правовых системах двух стран. Подход Узбекистана характеризуется централизованным регулированием и государственной политикой, в то время как Япония демонстрирует более децентрализованную и гибкую систему, особенно в вопросах установления заработной платы и автономии работодателей. Также рассматриваются социально-экономические условия, формирующие эволюцию трудового права в обеих странах, включая демографические изменения, экономические структуры и культурное отношение к труду. Посредством данного сравнительного исследования статья стремится углубить понимание того, как правовые системы реагируют на вызовы, связанные с балансом между экономической эффективностью и социальной защитой в различных национальных контекстах.

Ключевые слова: трудовое право, Трудовой кодекс Узбекистана, Закон о трудовых стандартах Японии, регулирование рабочего времени, минимальная заработная плата, сравнительное трудовое право, правовые гарантии в трудовых отношениях.

Abstract. This article presents a comparative analysis of the employment legislation of Uzbekistan and Japan, focusing on key aspects such as working hours, minimum wage, and legal guarantees. Drawing upon statutory provisions, official statistics, and academic literature, the paper highlights both convergences and divergences in the regulatory frameworks of the two countries. Uzbekistan's approach emphasizes centralized regulation and state-led policy-making, whereas Japan demonstrates a more decentralized and flexible system, particularly in wage determination and employer autonomy. The article also examines the socio-economic contexts that shape labor law evolution in both nations, including demographic shifts, economic structures, and cultural attitudes toward work. Through this comparative study, the article aims to contribute to a deeper understanding of how legal systems respond to the challenges of balancing economic efficien-

cy with social protection in diverse national contexts.

Keywords employment law, Uzbekistan Labor Code, Japan Labor Standards Act, working hour's regulation, minimum wage, comparative labor law, legal guarantees in employment.

Annotatsiya. Ushbu maqolada O'zbekiston va Yaponiya mehnat qonunchiligi taqqoslab tahlil qilinadi. Asosiy e'tibor ish vaqti, eng kam ish haqi va huquqiy kafolatlar kabi jihatlariga qaratilgan. Qonunchilik hujjatlari, rasmiy statistika va ilmiy adabiyotlar asosida ikki davlatning mehnatni tartibga solish tizimidagi o'xshashliklar hamda farqlar yoritib beriladi. O'zbekistonning yondashuvi markazlashgan tartibga solish va davlat boshchiligidagi siyosat bilan ajralib turadi, Yaponiyada esa ish haqi belgilanishi va ish beruvchining mustaqilligi nuqtai nazaridan markazlashtirilmagan va moslashuvchan tizim mavjud. Maqolada shuningdek, har ikkala mamlakatda mehnat qonunchiligi rivojlanishiga ta'sir qiluvchi ijtimoiy-iqtisodiy omillar demografik o'zgarishlar, iqtisodiy tuzilmalar va mehnatga bo'lgan boshq munosabatlar ham ko'rib chiqiladi. Ushbu qiyosiy tadqiqot orqali maqola turli milliy kontekstlarda iqtisodiy samaradorlik va ijtimoiy himoya o'rtasidagi muvozanatni ta'minlashga qaratilgan yuridik tizimlar qanday javob berishini chuqurroq tushunishga hissa qo'shishni maqsad qiladi.

Kalit so'zlar: mehnat huquqi, O'zbekiston Mehnat kodeksi, Yaponiya Mehnat standartlari to'g'risidagi qonun, ish vaqti tartibga solinishi, eng kam ish haqi, taqqoslovii mehnat huquqi, mehnatdagi huquqiy kafolatlar.

I. Introduction

In an era marked by rapid globalization and dynamic labor markets, comprehending the intricacies of employment laws across diverse nations is essential. This study undertakes a comparative analysis of the labor law frameworks of Uzbekistan and Japan—two countries with distinct legal traditions and socio-economic landscapes. As of July 2024, Uzbekistan's population reached approximately 37.2 million, with 15.089 million individuals classified as economically active. Among these, about 14.213 million people are employed across various sectors of the economy. Specifically, 6.8 million individuals work in the formal sector, 5.5 million in the informal sector, and 1.9 million are employed abroad [1]. In contrast, Japan's labor market in July 2024 comprised 67.95 million employed individuals, marking an increase of 230,000 compared to the same month the previous year. This total included 37.22 million men and 30.74 million women, reflecting a notable rise in female employment [2]. By examining key aspects such as worker classifications, working hours, minimum wage standards, maternity and childcare provisions, trade union rights, and specific challenges like forced labor and overwork-related issues, this research aims to highlight both the commonalities and divergences in their approaches to labor protection. Through this comparative analysis, we seek to uncover

insights that can inform policy reforms and promote fair labor practices in diverse contexts.

II. Materials and Methods

This comparative legal study employed a qualitative research methodology, focusing on the labor law frameworks of Uzbekistan and Japan. Primary sources included national labor codes, governmental labor statistics, and official policy documents from both countries. Secondary sources comprised academic journals, international labor organization reports, and relevant legal commentaries. The study focused on key aspects such as worker classifications, working hours, minimum wage standards, maternity and childcare provisions, trade union rights, and challenges like forced labor and overwork-related issues. Comparative analysis was conducted to identify similarities and differences in labor protections and to derive insights for potential policy reforms.

III. Research Results

3.1. Types of Workers Protected by Employment Law

Employment law frameworks are designed to define and protect the rights of workers within the scope of formal labor relations. In Uzbekistan, the Labor Code stipulates that individuals who meet the minimum working age, possess legal capacity, and have entered into a formal employment contract with an employer are recognized as employees. This protection extends not only to citizens of the Republic of Uzbekistan but also to foreign nationals and stateless persons residing within the country.

The rationale behind employment regulations is to safeguard the fundamental rights of workers, promote equal opportunities and treatment without discrimination, and enhance the well-being of workers and their families, all while considering the advancements of the business world [3, p. 759].

However, the scope of labor protection under Uzbekistan's Labor Code does not extend to all working individuals. Those engaged under civil law contracts—such as freelancers and independent contractors—are regulated by the Civil Code rather than labor legislation. Moreover, the Labor Code does not apply to compulsory military personnel, members of supervisory boards, or members of audit commissions.

In contrast, Japanese labor law, rooted in a civil law tradition, defines a “worker” under the Labour Standards Act (LSA) as a person employed by a business or office who receives wages, regardless of the type of work performed. These individuals are entitled to a wide range of labor protections. However, similar to Uzbekistan, certain categories of workers fall outside the scope of employment law. These include self-employed individuals, independent contractors, and persons engaged under outsourcing agreements. Labour law formed by sets of established rules of legislation and interpretation may have been suited to a system of civil law and Japanese society [4, p. 238].

Despite differences in their legal traditions, both Uzbekistan and Japan draw a clear legal boundary

between employees—entitled to labor protections—and non-employees, whose work arrangements fall under alternative legal regimes. This distinction highlights the evolving challenges of labor classification in modern economies, especially amid growing non-standard forms of employment.

3.2. Regulation of Working Hours

The regulation of working hours is a fundamental aspect of labor law that directly impacts economic productivity, employee well-being, and overall social stability [5, p. 29]. Legislators aim to ensure that working time is structured in a manner that balances the interests of both employers and employees while safeguarding workers' health and family life.

Under the Labor Code of Uzbekistan, the normal duration of working hours must not exceed forty hours per week, whether allocated across a five-day or six-day workweek. For employees working six days a week, the daily working hours are limited to seven hours, while those on a five-day schedule may work up to eight hours per day. Provisions regulating overtime are also clearly defined: overtime must not exceed four hours over two consecutive days or two hours per day in hazardous or unfavorable conditions and the total annual limit for overtime work is set at 120 hours.

In contrast, Japan's labor regulations despite outlining similar limits have been criticized for their limited capacity to deter excessive working hours. As noted by Takami Japan's legal regulations are said to lack the force to deter long working hour and discussion has been directed at strengthening legislation [6, p. 21].

The Labour Standards Act (LSA) establishes a standard of eight working hours per day and forty hours per week for full-time employees, commonly distributed across five days. Nonetheless, the Japanese framework includes exceptions. Overtime is generally limited to 45 hours per month and 360 hours per year, though special labor-management agreements (known as “36 Agreements”) may allow for extensions under exceptional circumstances such as temporary increases in workload. Safeguards designed to prevent health hazards and ensure that extended hours remain an exception rather than a norm must accompany these agreements.

While Uzbekistan and Japan both enshrine statutory working hour limits, the effectiveness of these regulations largely depends on cultural factors, enforcement mechanisms, and the availability of exceptions. Uzbekistan's model emphasizes quantitative caps and strict regulation, whereas Japan continues to grapple with the practical challenges of implementation and workplace culture.

3.3. Minimum Wage Standards

Minimum wage regulation plays a critical role in safeguarding workers' socio-economic rights by ensuring a baseline standard of living. In Uzbekistan, the minimum wage is established uniformly across the country, informed by the recommendations of the Republic's Tripartite Commission on Social-Labor Issues and aimed at

guaranteeing a decent standard of living for workers. This statutory minimum is binding for all employers, regardless of their organizational-legal form, ownership type, or departmental affiliation. Pursuant to Presidential Decree No. PD-108 (August 2024), the minimum monthly wage has been set at 1,155,000 Uzbek soums.

While the Labor Code of the Republic of Uzbekistan provides for most organizations that they themselves set local standards for their employees, including, under a collective agreement, specific systems and salary rates for certain groups of employees, bonuses and additional salary [7, p. 399].

It is important to note that the minimum wage does not encompass additional earnings such as bonuses, overtime compensation, wage supplements for work on holidays or rest days, night work premiums, regional coefficients, or other incentive and social payments. These payments are regulated separately and must be paid in addition to the minimum wage.

Japan offers a contrasting model that combines national labor standards with a decentralized approach to minimum wage regulation. The Minimum Wages Act ensures fair compensation, but a distinctive feature of the Japanese framework is its regional variability. Minimum wage rates are determined at the prefectural level, with additional industry-specific rates applied in some sectors to reflect local economic conditions.

The effect of overtime regulations must be dependent on whether the fixed-job or the fixed-wage model holds [8, p. 249].

As of April 2025, the minimum hourly wage in Tokyo has been set at 1,163 yen, representing the highest rate among all prefectures. Regional minimum wage councils under the supervision of the Ministry of Health, Labour and Welfare review these rates annually. It is the legal responsibility of employers to remain informed about these changes. Failure to comply with the applicable minimum wage requirements not only constitutes a breach of labor standards but also exposes the employer to financial penalties and other legal sanctions. Therefore, consistent monitoring and adjustment of wage practices are essential to ensuring compliance and avoiding unfair labor practices.

In sum, both Uzbekistan and Japan recognize the importance of minimum wage legislation in promoting economic justice and labor market equity. While Uzbekistan favors a centralized national standard, Japan's regionally nuanced approach reflects its commitment to flexibility and responsiveness to local economic realities.

3.4. Maternity and Childcare Leave Provisions

The Labor Code of Uzbekistan provides specific legal guarantees concerning the labor rights of women and individuals fulfilling family responsibilities, particularly during pregnancy, childbirth, and early childcare. These provisions aim to protect maternal health, promote child well-being, and ensure job security for working parents. In accordance with the Code, pregnant employees are entitled to additional paid days off to receive antenatal

care, including perinatal screening, mandatory examinations, and other essential medical services provided by primary healthcare institutions.

Maternity leave is granted for a total of 126 calendar days 70 days before childbirth and 56 days after. In cases of complicated childbirth or the birth of two or more children, the postnatal leave is extended to 70 days. During this period, the employee receives a maternity allowance amounting to no less than 75 percent of her average monthly wage, in line with national legislation. After the expiration of maternity leave, women are entitled to childcare leave until the child reaches the age of two, with financial support provided by the state. Additionally, at the mother's request, unpaid extended leave may be granted until the child turns three.

Despite these legal protections, certain challenges persist in practice. Studies highlight a systemic lack of institutional support for working mothers in Uzbekistan, which often hinders women's participation in the formal labor market [9, p. 47]. These challenges include limited access to affordable childcare and societal expectations that reinforce traditional gender roles in caregiving.

Comparative analysis shows that Japan offers a similarly comprehensive framework through its Labor Standards Act and the Child Care and Family Care Leave Act. Japanese law entitles female employees to six weeks of maternity leave before childbirth and eight weeks after delivery, with compensation paid through health insurance. In addition, both parents may take childcare leave until the child reaches one year of age, with possible extensions under specific circumstances. Recent amendments to the Child Care and Family Care Leave Act, effective from April 1, 2025, introduced greater flexibility in working arrangements for employees raising children aged three and above, aiming to promote better work-life balance.

Globally, early adopters of paid maternity leave such as Japan, China, Chile, and South Africa introduced these protections as early as the 1920s [10, p. 282]. While legislative frameworks exist in many countries, the effectiveness of such policies depends heavily on their implementation, societal support systems, and workplace culture. In both Uzbekistan and Japan, ensuring real access to childcare and fostering gender-equitable workplaces remain central to enhancing maternal employment outcomes.

3.5. Protection of Trade Union Rights

In Uzbekistan, the institutional foundation for trade unions is rooted in the Constitution, the Labor Code, and the Law on Trade Unions, all functioning under the Social Partnership Model. These legal frameworks recognize trade unions as essential actors in the promotion and protection of workers' rights. The central coordinating body is the Federation of Trade Unions of the Republic of Uzbekistan, which facilitates the collective implementation of rights and ensures solidarity among its members [11, p. 25].

According to Uzbek law, all employees are guaranteed

the freedom of association. This includes the right to form and join trade unions or other types of employee associations, without prior permission and free from discrimination. The legal system explicitly prohibits any coercion to join or refrain from joining a trade union, as well as any interference with an employee's decision to organize. In instances where trade unions are not present at a given level of social partnership, the legislation allows employees to create alternative associations to express and defend their interests.

Japan, similarly, guarantees union rights under its Trade Union Act, which is a cornerstone of its post-war labor legislation. This act affirms workers' rights to establish and join unions, participate in union activities, and engage in collective bargaining without fear of reprisal. Employers are legally prohibited from retaliating against employees for their involvement in union activities, and any such action is deemed an unfair labor practice.

Despite significant economic transformations, Japan's labor-management relations have shown a remarkable degree of continuity over the past two decades. Traditional features such as company-based unions, seniority-based wage systems, long-term employment, and the annual spring labor offensive (where wage negotiations are centralized early in the year) remain prevalent [12, p. 24]. Such enduring structures highlight the stabilizing role trade unions continue to play in industrial relations.

Collective bargaining is a cornerstone of Japan's labor system. The Trade Union Act mandates employer recognition of duly established unions and imposes a duty to negotiate fairly. Refusal to engage in negotiations, discriminatory practices against union members, or interference in union operations may be deemed unfair labor practices, subject to legal enforcement mechanisms.

In both Uzbekistan and Japan, trade unions are recognized not only as protectors of workers' rights but also as vital components of democratic labor governance. However, the effectiveness of these institutions depends largely on their operational independence, the responsiveness of employers, and the strength of enforcement frameworks supporting collective bargaining rights.

IV. Analysis and Discussion

4.1. Peculiarities of Uzbekistan's Labor Law System

Uzbekistan's labor legislation is primarily governed by the new Labor Code, which came into force in 2023, replacing the long-standing 1995 code. This reform was necessitated by the country's transition from a state-controlled economy to a market-oriented system, marked by the growing dominance of private enterprise. The updated code aims to create a more modern and responsive legal framework, better aligned with current economic realities. Nevertheless, the system retains several features characteristic of its Soviet legal heritage particularly its formalism, bureaucracy, and rigid proceduralism.

One of the most distinctive aspects of Uzbekistan's labor law regime is the emphasis on formal employer-

employee relationships. Legal protections are extended almost exclusively to those working under formal labor contracts, with informal workers, freelancers, and individuals employed under civil law contracts largely excluded from the scope of the Labor Code. This delineation results in substantial segments of the labor force especially in rural and low-income urban settings operating outside formal protections.

Another defining characteristic is the high degree of procedural formality embedded in labor relations. Most employment-related transactions such as hiring, disciplinary measures, and contract termination must be documented in writing, often with original signatures in blue ink. Although the 2023 reforms have introduced some digitalization and eased documentation requirements for micro and small enterprises, the procedural burden remains significant. Redundancy processes, for example, are tightly regulated, with non-compliance rendering employer actions invalid, even in economically justified cases.

The existing legal framework also reflects a strong imperative approach, wherein the law prescribes detailed, mandatory rules for parties rather than granting them autonomy to determine the content of their relationships. Scholars argue that this undermines labor market dynamism and economic growth. According to Ismoilov "the economic development of the country should be ensured through granting parties the free choice of their rights and responsibilities," and therefore, the role of imperative norms should be reduced to allow for more flexible labor regulation [13, p. 546].

In comparison to European models, several institutional gaps persist. Notably, Uzbekistan lacks comprehensive legal norms concerning the transfer of undertakings a principle widely observed in EU labor law which ensures the preservation of employee rights during company mergers or acquisitions. In Uzbekistan, acquiring entities are under no obligation to retain existing employees, exposing workers to job loss without sufficient legal recourse. Furthermore, restrictive post-employment clauses such as non-compete agreements are largely unenforceable under current law, limiting employers' ability to safeguard their business interests after the termination of employment.

Nonetheless, the code maintains a strong orientation toward employee protection. Dismissal procedures especially those initiated by the employer are encumbered by a multi-layered system requiring extensive documentation, justification, and in some cases, approval from trade unions or labor inspection authorities. Fixed-term contracts are allowed only under narrowly defined exceptions, and the legislation affords enhanced protection to vulnerable groups such as pregnant women, single parents, and individuals with dependents.

Taken as a whole, Uzbekistan's labor law reflects a model oriented toward safeguarding employment security and promoting social stability. These aims, however, often come at the cost of flexibility for employers and increased

administrative complexity. The 2023 reforms mark a positive step toward liberalization, but further legislative development is necessary to bridge the gap with international labor standards. Future reforms should focus on streamlining procedures, expanding protections to informal workers, and introducing balanced contractual freedom, thereby fostering a labor market that is both inclusive and globally competitive.

4.2. Features of Japan's labor law system

Japan's labor law framework is marked by a strong commitment to worker protection, emphasizing job security, fairness, and human dignity. Central to this system is a clear distinction between those covered by labor legislation and those who are not. Legal safeguards primarily apply to individuals in employer–employee relationships. In contrast, those operating independently such as executive board members or independent contractors are generally excluded due to their autonomy in managing their work without employer supervision.

One of the most distinctive features of Japanese labor law is the absence of “at-will” employment. Employers cannot dismiss regular employees arbitrarily; termination must be based on objective justification and conform to prevailing social norms. Courts enforce this requirement rigorously, relying on judicial precedent to ensure consistency and protection. This legal approach is heavily influenced by the postwar *shūshin koyō* (lifetime employment) tradition. Although not enshrined in statutory law, this unwritten practice of long-term employment and mutual loyalty between employers and employees continues to shape expectations and judicial attitudes, particularly in unfair dismissal claims.

In recent years, Japan has undertaken legislative reforms to reinforce overtime regulations. Labor performed on statutory holidays or during late-night hours must be compensated at premium rates. Furthermore, monthly and annual overtime hours are capped, except where a special “Article 36 Agreement” (*saburoku kyōtei*) is in place with employee consent. These measures reflect growing concern over harmful overwork practices and emphasize the government's focus on employee well-being.

Japan's labor laws also offer robust protections against discrimination. These extend beyond traditional categories such as gender, nationality, and religion to include protection from adverse treatment related to union activities or taking family-related leave. Notably, the rise in the number of working pregnant women over the past decade has drawn attention to issues such as “maternity harassment.” Research shows that regular employees face a higher risk of such harassment than their non-regular counterparts [14, p. 87].

In response to increasing public awareness, legal reforms have strengthened employer obligations to prevent workplace harassment. Laws now also prohibit unjustified disparities in working conditions between regular and non-regular employees, underscoring a push toward equity in the workplace.

While Japan's trade union structure is predominantly

based on enterprise unions, the national unionization rate has seen a steady decline. Nonetheless, the Trade Union Act guarantees essential rights: employees retain the freedom to organize, engage in collective bargaining, and participate in union activities without fear of employer interference or retaliation.

Altogether, these legal features highlight Japan's dedication to fostering a balanced and humane labor environment. Despite evolving labor market trends, the foundational principles of job stability, fairness, and respect for workers remain deeply embedded in Japan's employment law system.

4.3. Eradication of Forced Labour in Uzbekistan

Over the past five years, Uzbekistan has made remarkable strides in eradicating forced labour, particularly within its historically problematic cotton sector. This achievement has been widely recognized by the International Labour Organization (ILO), which has tracked the country's progress through its Third-Party Monitoring reports. The data shows a clear downward trajectory in the prevalence of forced labour—from 14% in 2015–2016 to 4% in 2020, and finally to just 1% in 2021. These figures reflect a sustained and effective policy shift driven by both political will and institutional reform efforts [15].

A key factor in this transformation has been the government's commitment to legal and institutional reforms. In 2019, enforcement mechanisms were strengthened significantly. The number of labour inspectors monitoring the cotton harvest doubled from 200 to 400, and that year alone, 1,282 cases of forced labour were investigated. This marked a significant step toward accountability and transparency in labour relations. Furthermore, ILO monitors reported that cotton pickers received higher wages, with payments generally made in full and on time. These improvements not only discouraged coercive practices but also promoted voluntary labour participation by enhancing the attractiveness and fairness of the work environment.

Uzbekistan has also ratified all key ILO conventions related to forced and compulsory labour, as well as conventions addressing the elimination of the worst forms of child labour. These international commitments have been supported domestically through presidential decrees and government regulations aimed at ensuring effective enforcement [16, p. 1087].

To reinforce these reforms, Uzbekistan imposes strict penalties on those who violate labour rights. Under Article 51 of the Code of Administrative Responsibility, individuals who engage in forced labour practices face fines ranging from fifty to one hundred times the base calculation amount. More severe violations fall under Article 148(2) of the Criminal Code, which provides for fines of one hundred to one hundred and fifty times the base amount, restriction of rights for up to two years, or correctional labour for up to two years.

The eradication of forced labour in Uzbekistan stands as a compelling example of how political resolve, international cooperation, and legal reform can bring about

profound social change. This transformation not only enhances the country's human rights record but also paves the way for sustainable development and improved labour standards.

4.4. "Karoshi (Work to Death)" in Japan

Karoshi is a Japanese term that literally means "death from overwork." It refers to sudden and often fatal medical conditions—such as heart attacks, strokes, or severe mental health disorders like depression—that are directly linked to excessive working hours and extreme job-related stress.

The phenomenon has become a serious concern in modern Japan, with recent statistics illustrating its alarming rise. According to the 2024 White Paper on Measures to Prevent Karōshi, 883 people were recognized as suffering from mental health disorders due to overwork—an increase of 173 from the previous year, marking the highest number on record. Among these, 79 cases involved suicides or attempted suicides. Additionally, 216 individuals were recognized as suffering from work-related brain or heart conditions, surpassing 200 cases for the first time in four years [17].

Although karoshi began drawing public attention in the 1980s, it has become even more serious in the last three years [18, p. 1].

Japan's traditional workplace culture centered on long hours, group loyalty, and emotional commitment to one's company continues to promote a lifestyle that blurs the line between dedication and dangerous overexertion. While hard work and loyalty are generally admirable traits, in many cases, they become mechanisms of exploitation that lead to burnout, illness, and premature death [19, p. 49].

In extreme cases, the psychological toll of overwork leads to karōjisatsu, a term used for suicides caused by occupational stress and depression. These tragedies, though deeply personal, are emblematic of systemic issues that affect thousands of workers and their families [20, p. 76].

Over the past decades, Japanese policymakers have responded with legislative measures, including capping overtime hours, mandating mental and physical health checks, and encouraging better work–life balance. The Work Style Reform Law, enacted in 2018, was a major legislative step that limited monthly overtime to 45 hours in principle and aimed to reduce the culture of overwork. However, these measures often fall short in practice, particularly among smaller companies that lack compliance mechanisms or fear productivity loss.

Despite legal reforms, karoshi remains a pressing issue due to deeply ingrained social expectations and rigid corporate hierarchies. Workers often feel compelled to demonstrate loyalty through over commitment, making it difficult to assert their rights. Therefore, addressing karoshi requires not only legal intervention but also cultural change—toward valuing rest, health, and human dignity over performance at any cost.

A multifaceted strategy involving employers, unions,

policymakers, and civil society is necessary to protect worker well-being and ensure that the workplace no longer becomes a place of silent suffering or premature death.

V. Conclusion

This comparative analysis of employment law in Uzbekistan and Japan reveals both convergence and divergence in their legal frameworks, shaped by their respective socio-economic realities and legal traditions. While both countries establish clear legal definitions of "employees" and provide foundational protections for formally employed workers, they diverge in the comprehensiveness and enforcement of these rights—particularly for non-standard forms of employment, which remain inadequately protected in both systems.

Uzbekistan adopts a more centralized and prescriptive approach, especially regarding working hours and minimum wage standards, with uniform national rules and quantitative limits. In contrast, Japan's decentralized and flexible system allows regional and sectoral variations, though it struggles with enforcement—especially in relation to overwork and employer compliance.

Despite Japan's economic maturity and Uzbekistan's ongoing transition toward a market economy, both countries face common challenges: addressing informal employment, improving enforcement mechanisms, and ensuring the inclusion of vulnerable categories of workers. Additionally, both systems underscore the growing importance of integrating social protections with evolving labor market demands, including the rise of non-traditional work arrangements.

Ultimately, cross-national dialogue and comparative legal studies such as this can serve as valuable tools for mutual learning. Policymakers and scholars may draw lessons from each system's strengths and limitations, promoting legal reforms that enhance fairness, well-being, and resilience in an increasingly globalized labor market.

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