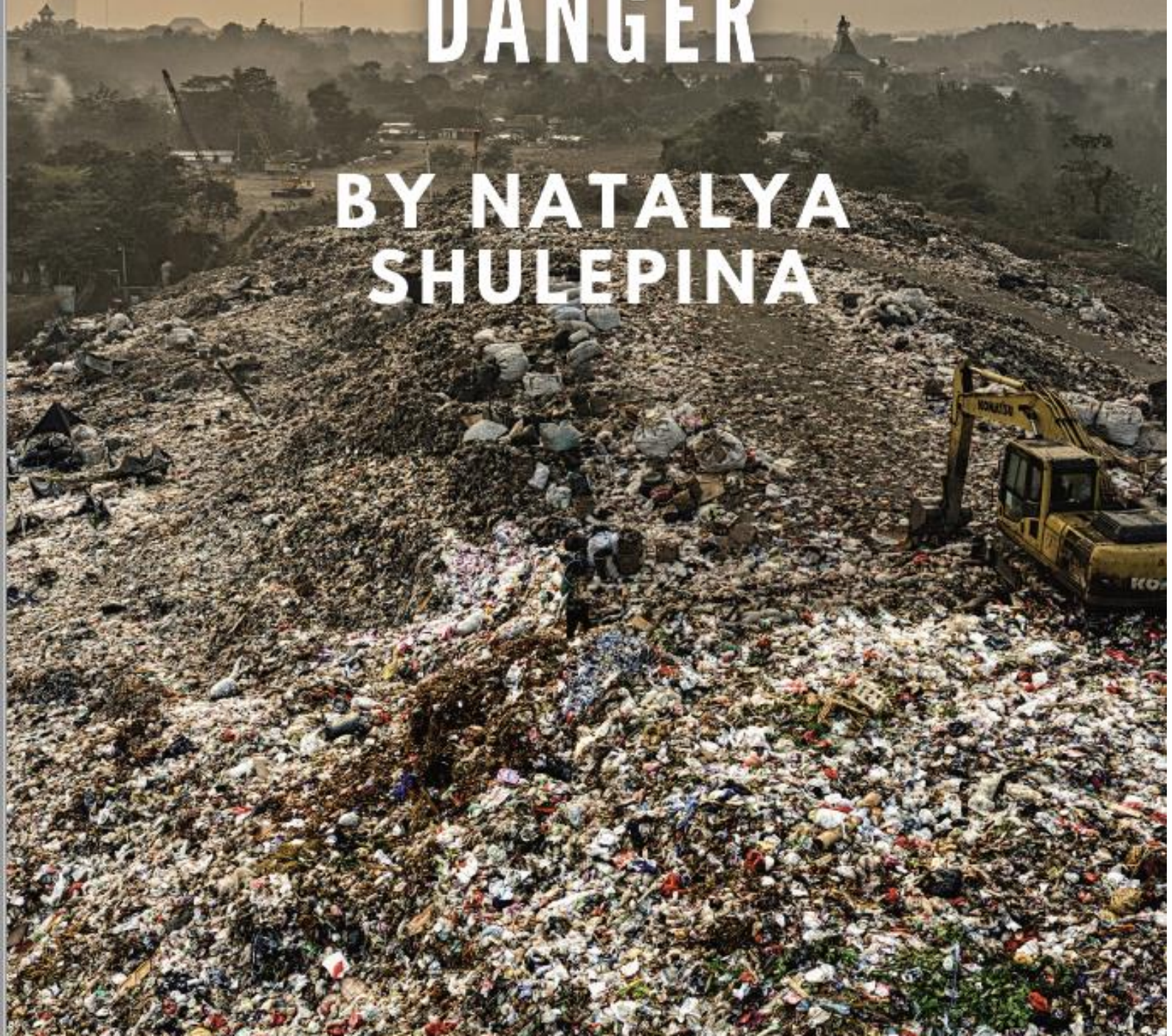


URBAN DEVELOPMENT ON TOP OF FORMER LANDFILLS: AN UNDERESTIMATED DANGER

BY NATALYA
SHULEPINA



While this paper focuses on Tashkent, the problem of residential construction on top of former landfills is much broader and affects many other parts of Uzbekistan. While unmarked on city maps, former landfill sites are there, and the local authorities willingly allocate these land plots for development and construction. The usual argument is, "Yes, there used to be a landfill here, so what? Land is too limited and expensive to allow these sites to stay vacant."

AGAINST THE LAW

The Law of Uzbekistan on waste management prohibits locating landfills in cities (pg. 22). According to the Sanitary Rules and Regulations governing construction, deep-foundation construction is not allowed on landfill sites – even on reclaimed ones. To quote, "No deep foundation construction is allowed on reclaimed solid waste landfills" (SanPiN RUz No. 0157-04, para 7.5). Administrative and criminal liability is imposed under the Administrative Code (pg. 53 and a number of other articles on the topic) and Criminal Code (pg. 193, 194, 195, 2571) of Uzbekistan for non-compliance with environmental and sanitary regulations.

However, both the Interdistrict Administrative Court of Tashkent and the city Prosecutor's Office refused to respond to such environmental violations brought to their attention. The court, after three hearings on a lawsuit filed by the City Department of Ecology and Environmental Protection against the developer, dismissed the claim stating that it was not within its competence and "should be filed with the Interdistrict Economic Court. " The city Prosecutor's Office, having received an official appeal from the *Novosti Uzbekistana (NU)* newspaper, forwarded it to the prosecutor's office of the Yunsabad district, and the latter replied to the newspaper that the issue was not within their prosecutorial competence: "You should take your complaint to the supervising instance."

More on litigation and correspondence with the authorities later, but first let us examine the origins and content of the mountains of waste piling up in the Uzbek capital.

WASTE HAS BEEN DUMPED INTO THE CITY'S LANDFILLS FOR DECADES

There is a district in Tashkent that hosts two landfills. One of them, in the Khasanbay neighborhood, used to be a separate village and was only recently included in the city boundaries.

The community is home to a 15-hectare landfill surrounded by one-story houses. The site was formerly used by a brick factory as a source of clay. Once clay was depleted, the deep pit was used for dumping municipal waste.

The author wrote about it in an article for *Novosti Uzbekistana* on 25 December 2020 "Хокимият раздаёт участки на свалке в Хасанбае, а санврачи и экологи не замечают беспредел" [*While the khokimiat allocates land plots on the landfill in Khasanbay for residential development, sanitary doctors, and environmentalists look the other way*].¹ The healthcare and environmental authorities continued to ignore the problem until the Public Advisory Council to the State Committee for Ecology initiated a visit to the site.

"The exact morphological composition of the waste is unknown, as no surveys have been undertaken," said Farhod Dekhkanov, Deputy Head of the State Ecology Committee Tashkent Office, during the joint visit of environmentalists, Advisory Council members, MPs, and journalists to the landfill, adding, "the content of the waste needs to be analyzed."

The visitors observed that the landfill was still used for dumping waste, emitting pungent odors from common landfill gases such as methane, hydrogen sulfide, and aromatic hydrocarbons.

Nevertheless, the area over the landfill even now continues to be allocated for individual housing construction. Homeowners have complained about the odors, but what contaminants are present in the air they breathe is unknown.

It is a somewhat surprising fact that this landfill is not registered either in the city Land Cadaster or in the Landfill Cadaster maintained by the State Committee for Ecology and Environmental Protection. Officially, there are no landfills in Tashkent, and the fact that landfill sites are not officially registered as such makes it easy for officials to allocate these land plots to developers.

Another landfill site discussed here is to host the would-be Yunusabad Business City Multifunctional Complex. In addition to solid municipal and construction waste, this site was once used to dump industrial waste. The fact that it is also absent from the cadaster raises questions about the performance of a number of government services and departments.

The khokim of Tashkent, Jakhongir Artikkhodjaev, allocated the area for the construction of the complex by his decision No. 983 of 12 July 2019, "On granting permission for demolition and construction on a land plot." The 45-hectare land allotment includes the territory and

¹ "Хокимият раздаёт участки на свалке в Хасанбае, а санврачи и экологи не замечают беспредел," *Novosti Uzbekistana*, December 25, 2020, <https://nuz.uz/obschestvo/1183059-hokimiyat-razdaet-uchastki-na-svalke-v-hasanbae-a-sanvrachi-i-ekologi-ne-zamechayut-besprede.html>.

the former dump site of the Abrasive Plant in Yunusabadsky (formerly Kirovsky) District. The plant was relocated from Tashkent in 1941 during WWII. At that time, when the slogan was "Everything for the front, everything for the victory," waste management was not a priority. Thus, industrial waste was the first to fill the nearby natural pits and then the clay pit of the local brick factory. More waste was dumped into the landfill over time, generating multi-layered mountains of waste since the 1940s.

LANDFILL SITE ALLOCATED TO FOREIGN INVESTORS FOR CONSTRUCTION

A total of ten lots were designated as part of the Yunusabad Business City project for the construction of Class A real estate, a kindergarten, an international school, a hotel, and a number of business centers.

Three lots with the area of 8.8 hectares were purchased by TSC-NK-INVESTMENT, a Chinese investor. They were contracted by the Yunusabad Business City Directorate to build two dozen skyscrapers. The Directorate promised to clean the area from debris and excess soil and signed a contract worth 9.5 billion soums (about \$ 1 million) with Techno Logistic Construction LLC to remove all waste before the end of 2019. According to the State Register of Companies, Techno Logistic Construction LLC voluntarily dissolved in 2020.

Mountains of waste still pile up on the territory of the future complex. In August 2020, *Novosti Uzbekistana* published an article entitled "Экскурсия по свалке, где будет Юнусабад сити" [A tour of the landfill site which will be Yunusabad City].²

The article was based on observations from *NU* journalists' visit to the landfill upon request from local residents who were concerned that the landfill contained industrial, as well as construction and municipal waste. By looking at the edges of this multi-hectare landfill, one could see that it indeed contained all of it and more. The *NU* article also refers to legislation which bans any deep-foundation construction on top of landfills.

There was no reaction to the publication. In November 2020, journalists from two media outlets – *Novosti Uzbekistana* and *uz24.uz* – organized another visit to the landfill site allocated for the Yunusabad Business City construction. They were accompanied by members of the Advisory Council to the State Committee for Ecology, experts of the Tashkent Environmental Review Office and staff of the State Committee for Ecology Tashkent Office. The environmental experts were shocked at what they saw: they had

² "Экскурсия по свалке, где будет Юнусабад сити," *Novosti Uzbekistana*, August 24, 2020, <https://nuz.uz/svobodnoe-mnenie/1169610-ekskursiya-po-svalke-gde-budet-yunus-abad-siti.html>.

issued the environmental seal of approval based on data provided by the applicant requesting the approval, but had never physically visited the site, trusting the applicant's data. They had not expected to see a huge landfill on the site.

The two media outlets produced reports on the findings: "Кому нужен Юнусабад-сити на свалке промышленных и бытовых отходов" [*Who needs a Yunusabad City on an industrial and household waste landfill?*]³ published by *Novosti Uzbekistana* on 24 November 2020 and "Зачем строить новый дом на старой свалке?" [*Why build a new house on an old landfill?*]⁴ on 1 December 2020 and "Экопатруль: Зачем строить новый дом на старой свалке?" [*Eco-patrol: Why build a new house on an old landfill?*]⁵ by *uz24.uz* on 2 December 2020.

The city's khokimiyat retorted: its press service issued a statement which was published in *Novosti Uzbekistana* on 26 November 2020, entitled "Yunusabad Business City — варварская стройка или инвестиции в будущее?" [*Yunusabad Business City: uncivilized construction or investment in the future?*].⁶

Here is a quote from their statement, "Thus, *Yunusabad Business City* will be located at the intersection of Yangi Shahar and Chinabad streets and will cover an area of 45 hectares. This *no man's land* has, since the 1930s, been used as a spontaneous, unauthorized landfill. For example, as Tashkent started to be rebuilt following the 1966 earthquake, construction waste from demolished buildings was often dumped here. Since independence was declared, many unscrupulous business owners and careless public employees have continued to dump construction waste here."

This statement indicates that the khokimiyat is well aware of the landfill's existence. They also admit that in addition to construction waste, the landfill contains "leftover waste from brick and abrasive factories, located nearby at different times, and something needs to be done about it."

Stating the figure of "290,635 cubic meters of waste taken out," the khokimiyat indicates that the illegal dumping continues. Another quote: "Making it a protected area would simply mean having a bare site in the city and spending additional public funds on its protection. The former option of having this area developed has a lot of advantages and is finally being implemented right now. Its development is pursued with the aim of making this

³ "Кому нужен Юнусабад-сити на свалке промышленных и бытовых отходов," *Novosti Uzbekistana*, November 24, 2020, <https://nuz.uz/svobodnoe-mnenie/1179628-komu-nuzhen-yunusabad-siti-na-svalke-promyshlennyh-i-bytovyh-othodov.html>

⁴ "Зачем строить новый дом на старой свалке?," *Novosti Uzbekistana*, December 1, 2020, <https://mover.uz/watch/FeZeln/>

⁵ "Экопатруль: Зачем строить новый дом на старой свалке?" *uz24.uz*, December 2, 2020, <https://uz24.uz/ru/articles/noviy-dom-na-staroy-svalke>.

⁶ "Yunusabad Business City — варварская стройка или инвестиции в будущее?" *Novosti Uzbekistana*, November 26, 2020, <https://nuz.uz/svobodnoe-mnenie/1179871-yunusabad-business-city-varvarskaya-strojka-ili-investiczi-v-budushhee.html>.

city more comfortable, convenient, advanced and affluent, and in accordance with Presidential Decree No. PP-3895 on creating modern 'Business City' centers in the Republic."

Whether building a Business City on top of a landfill will indeed make the city more comfortable, convenient, advanced, and affluent is questionable. But the mere fact that the construction is carried out on a landfill site and the khokimiyat is well aware of it is sufficient reason for the prosecutor's office to intervene. However, as mentioned above, the city prosecutor's office responded to journalists' letter by forwarding it down the chain of command to the district prosecutor's office which is located literally within walking distance from the landfill but being a district-level authority does not have the power to challenge the city khokim's decisions.

RETROACTIVE APPROVALS

In addition to the huge amounts of waste which had to be taken out from the sites, there were other reasons why the State Environmental Committee's Advisory Council members and journalists were worried about the construction projects on top of landfills.

To remind, the khokim of Tashkent issued his decision in 2019, while the services such as the city SES (now a subdivision of the Service for Sanitary and Epidemiological Wellbeing and Public Health of the Republic of Uzbekistan) and the Center for State Environmental Review, which is part of the Tashkent branch of the State Committee for Ecology, approved the construction in 2020. The procedure seems to be in reverse order, because once the boss approves something, can a subordinate disagree?

When asked by *Novosti Uzbekistana* about their approval of the construction on top of landfills, the sanitary doctors replied, "No landfill was registered by the Tashkent khokimiyat on the land plot located in Yangishakhar street of Yunusabad district." Indeed, if a landfill is not on the cadastral documents, there is nothing to talk about. The *NU* editorial office received no reply whatsoever to its question about the Khasanbay landfill from the Service of Sanitary and Epidemiological Wellbeing and Public Health of the Republic of Uzbekistan.

The Law on Sanitary and Epidemiological Wellbeing of the Population sets out the procedure to follow when sanitary rules and regulations are broken. Specifically, it says that the law empowers relevant public officials (such as the Chief Sanitary Doctor of the city) to suspend any construction or reconstruction of settlements, buildings, and facilities in cases of non-compliance with the law on sanitary and epidemiological wellbeing of the population (Article 12). The Law also stipulates that the sanitary rules and regulations are binding on all public bodies and other entities and individuals (Article 5).

On 15 October 2020, in response to an inquiry from the Public Advisory Council to the Tashkent Khokimiyat, the Tashkent Institute for General City Planning Research and Design that keeps records of all city's areas since 1937 confirmed the existence of a landfill in the area allocated to the Yunusabad Business City.

Indeed, had the Institute been involved in the review and approval of the project, the architects could have alerted the developers to this fact, but since recently, the Institute is no longer on the list of organizations to be consulted before the allocation of land plots for development.

It was only when the experts from the Environmental Review Office measured the length of the landfill mountains in steps and reported their findings that the Tashkent Office of the State Committee for Ecology and Environmental Protection sent their staff to the site on 16 December 2020 to take soil samples for the first time.

The excess of heavy metals was compared to samples from the trail leading up to the Aktepa Yunusabad settlement in the immediate vicinity of the fresh toxic dumps – although it would have been more appropriate to use natural background values as the baseline. But even as it was, the Center for Specialized Analytical Control found the heavy metal content to exceed the baseline levels by 1.73 times for lead, 3.13 times for cadmium, 3.64 times for copper, and 2.34 times for zinc. They also found a 12.22-fold excess of sulfates and a 17.28-fold excess of nitrates compared to the baseline.

Novosti Uzbekistana asked the State Committee for Ecology and Environmental Protection for comments because it was clearly illegal to authorize construction over the landfill. In his reply of 31 December 2020, Deputy Chairman of the State Committee for Ecology Islombek Bokizhonov wrote, "The applicant is responsible for the accuracy and reliability of all documents and data they submit for the state environmental review. Based on the materials provided by the applicant, the said construction site had long before been a 1.5 to 19-meter landfill containing construction and municipal waste, as well as loose and dumped soils. At the time of drafting the EIS (Environmental Impact Statement), the heaps of dumped soil had been cleared and removed."

This was what the applicant said, no matter the actual situation. The Deputy Chairman also mentioned that the Tashkent Office of the State Committee for Ecology and Environmental Protection would request a court to invalidate the construction permit based on inaccurate environmental impact information.

The khokimiyat was given a month to remove the waste, and then a special working group would check whether the site had been properly cleaned.

Meanwhile, the investor continued the operation. Sanitary doctors who had every right to intervene and suspend the construction continued to look the other way. And litigation takes time.

THE ADVISORY COUNCIL TO THE STATE ENVIRONMENTAL COMMITTEE CALLS FOR INVESTIGATION

On 27 January 2021, the Advisory Council met with the new chairman of the State Committee, Alisher Maksudov, to question the legality of urban development projects on top of former landfills in Tashkent, in particular, the construction of Yunusabad Business City. The Advisory Council presented the results from soil testing at five randomly chosen spots within the 45-hectare construction site. "Thorough testing is required," was the takeaway message.

The State Committee chairman instructed Sobirkhon Mashrabov, head of the Water Resources Department, to set up a task force of environmentalists and Advisory Council members and visit the site on the next day for soil sampling and further investigation. On 28 January 2021, the task force collected samples from one of the pits which was open, the other one having been filled up. Analyzes performed by the Center for Specialized Analytical Control found the metal content to exceed the baseline levels by 2.95 times for lead, 7.65 times for cadmium, 19.22 times for copper, 1.45 times for chromium, 9.12 times (maximum) for zinc, and also detected excess sulfates at 33.33 over the baseline.

Pollutants of this type must be buried in a landfill site designed for industrial waste, according to the Hygienic Classifier of Toxic Industrial Waste in Uzbekistan (SanPiN RUz No. 0128-02 of 9 July 2002, a binding regulation.⁷

On 18 February 2021, *Novosti Uzbekistana* followed up by publishing an article entitled "Экологи подтвердили: Yunusabad Business City заложен на свалочном полигоне" [*Environmentalists confirm that Yunusabad Business City stands on a landfill site*].⁸

One would expect the next step to be a thorough and detailed investigation, right? Not really. Instead, there was an unexpected change at the State Committee for Ecology. Its

⁷[https://buxgalter.uz/ru/doc?id=185904_gigienicheskiy_klassifikator_toksicheskikh_promyshlennykh_othodov_v_usloviyah_respubliki_uzbekistan_\(sanpin_ruz_n_0128-02\)_utverjden_glavnym_gosudarstvennym_sanitarnym_vrachom_29_07_2002_g_\)&prodid=1_zakonodatelstvo_respubliki_uzbekistan](https://buxgalter.uz/ru/doc?id=185904_gigienicheskiy_klassifikator_toksicheskikh_promyshlennykh_othodov_v_usloviyah_respubliki_uzbekistan_(sanpin_ruz_n_0128-02)_utverjden_glavnym_gosudarstvennym_sanitarnym_vrachom_29_07_2002_g_)&prodid=1_zakonodatelstvo_respubliki_uzbekistan).

⁸ "Экологи подтвердили: Yunusabad Business City заложен на свалочном полигоне," *Novosti Uzbekistana*, February 18, 2021, <https://nuz.uz/obschestvo/1188677-ekologi-podtverdili-yunusabad-business-city-zalozhen-na-svalochnom-poligone.html>.

collegial meeting in February was attended by Deputy Prime Minister of Uzbekistan Achilbay Ramatov who presented a list of mid-level officials, including Sobirkhon Mashrabov, to be removed from office. This was how the task force lost its leader and was unable to proceed. A working group announced by Deputy Chairman Bokizhonov was never set up.

On 31 March 2021, the State Committee for Ecology hosted a meeting of an Interdepartmental Working Group for landfill testing and monitoring which involved a wide range of stakeholders from the Yunusabad Business City directorate, FE LLC TSC-NK-INVESTMENT, Uzhydromet, the district khokimiyat and the cadastral service. This was another initiative of the Advisory Council.

After an intense three-hour discussion of the issue of urban development over landfills, the group made field trips to the Khasanbay and Yunusabad landfills. The former visit is described above. Below is what the environmentalists, MPs, journalists, Advisory Council members, Chinese investors, and deputy head of the Yunusobod Business City directorate Sagdi Nuriakhmetov found on the other landfill site.

The pit on the first lot had long been filled up. All participants of the field trip could see black and gray layers on the walls of the second, still open, pit, and the results from the analysis of samples collected in the pit were also known.

Novosti Uzbekistana and *uz24.uz* covered the meeting and the field trips in their reports (see «Жить на свалке? Не смешно. Между тем ташкентские свалки продолжают застраивать» [*Living on top of a landfill? Not funny at all. Meanwhile, construction over Tashkent landfills continues*]⁹ and «Семь кругов строительного бума» [*Seven circles of construction boom*]).¹⁰

The head of the Advisory Council Yusufzhan Shadimetov sent a letter to the State Committee chairman Alisher Maksudov, attaching the minutes of the meeting, the details of the field trips and a brief analysis of the situation. It was expected that the Committee would request the project documentation for a thorough, national-level environmental review, undertake a detailed survey of the project area and properly designate it as a landfill in the State Cadastre until the site is fully cleaned out.

In May 2021, the Interdistrict Administrative Court of Tashkent considered the lawsuit initiated by the Tashkent Office of the Committee for Ecology and Environmental Protection against the Yunusabad Business City Directorate. The court eventually decided, after three

⁹ «Жить на свалке? Не смешно. Между тем ташкентские свалки продолжают застраивать», *Novosti Uzbekistana*, April 7, 2021, <https://nuz.uz/obschestvo/1193428-zhit-na-svalke-ne-smeshno-mezhdu-tem-tashkentskie-svalki-prodolzhayut-zastrivat.html>.

¹⁰ «Семь кругов строительного бума», *uz24.uz*, April 12, 2021, <https://uz24.uz/ru/articles/stroitelniy-bum-2021>.

sessions, that the matter was outside its competence. In his decision, Judge S. Mikhliev recommended the plaintiffs to take their claims to the Interdistrict Economic Court.

Meanwhile, the developer continued the construction. The project Directorate offered all possible assistance to the foreign investor – just one investor so far, for which the Directorate blamed the journalists, stating that "The mass media are responsible for obstructing foreign investments."

IS THE MEDIA RESPONSIBLE?

While the Interdistrict Administrative Court was considering the claim against the Yunusobod Business City Directorate, its head U. Umarov – as if he were unaware of the court proceedings – sent a letter to *Novosti Uzbekistana* demanding that the newspaper published a refutation of their earlier articles.

Specifically, he wrote in his letter of 10 May 2021, "Given that the information provided in these articles (*A tour of the landfill site which will be Yunusabad City* and *Who needs a Yunusabad City on an industrial and household waste landfill?*) is not true and undermines the reputation of this investment project, the Yunusabad Business City Directorate requests that you publish a refutation."

Since damage to the reputation of the Yunusabad Business City project can affect its ability to attract investors, should you fail to publish a refutation, we will sue you in court to claim compensation of the moral damage and to defend the reputation of the Yunusabad Business City project pursuant to Article 202 of the Administrative Code of Uzbekistan, 'Dissemination of false information. Dissemination of false information, including via mass media, telecommunication networks or the internet, if it results in debasement of dignity and discreditation of the individual.'

The editorial office could not respond while their legal action against the Directorate was pending. As a reminder, the environmentalists continue to insist that the Directorate submitted inaccurate data for the project's EIA. While the Directorate's threats against the newspaper for alleged damage to reputation sound intimidating, the landfill is very real and not invented by environmentalists, journalists or civic activists.

After the Interdistrict Administrative Court dismissed the environmentalists' claim and advised taking it to the Interdistrict Economic Court, the city khokimiyat's press service rebuffed the journalists, referring to the same newspaper articles as the Directorate head U. Umarov. Interestingly, neither letter mentioned the piece about the tour to the landfill sites, *Living on top of a landfill? Not funny at all. Meanwhile, construction over Tashkent landfills*

continues. Does it mean that they have no problems with its accuracy? And neither mentioned the development over the Khasanbay landfill. We assume they agree with that as well.

The press service stated, "Since the information provided in the aforementioned articles is untrue and undermines the reputation of the investment project, we consider it advisable to remove these articles from the website to avoid further dissemination of inaccurate information."

JUNE UPDATES ON THE LANDFILL STATUS

The abundance of documentary evidence makes it obvious what is true and what is false. But the newspaper still needed to respond to the threatening statements from the Directorate and the khokimiyat, and on 17 June 2021, the author together with Igor Logachev, member of the Advisory Council, made another trip to the landfill site where the Yunusabad Business City is being built.

By looking from the landfill mountain, they could clearly see all the three lots allocated to the Chinese investor. Construction was underway on the first one, where no samples had been collected. The second lot was being covered with soil; a pit on the edge of the land plot, where the environmentalists had detected significant technogenic pollution in winter, was still open – perhaps due to the ongoing litigation between the Chinese investor and the previous owner who dug the pit back in 2018 over the price of the removed soil.

The sides of the pit were intact, meaning that there was no deep digging on the remaining part of the lot. Reclamation – backfilling with soil – could be observed. The third lot of the Chinese investor covering the territory of the former Abrasive Plant was still untouched, perhaps also due to a dispute, but the operator was apparently active.

It turns out that the Chinese investor has almost completed the construction of a worker campsite, having made a road to the site over the landfill mountain and levelled off the mountain top to make more space. Whether they received environmental clearance for this does not seem a good question. As soon as an investor is found for this lot, there will be tensions. The landfill mountain has changed over the year. In August 2020, it was cut by a road used to carry out dirty soil to the area near the ancient settlement. In March, the road was virtually blocked due to excavations by black diggers. The search for valuable wastes, in particular aluminum, continues, while the side of the landfill adjacent to the plant has noticeably decreased in height. Where are they taking the waste?

According to the locals, the excavator works at night. They do not know where the heavy trucks take the waste. The local people also remember that the pit is very deep, at least fifteen meters deeper than the road level. These people have lived their whole lives near the Abrasive Plant and observed the pit being filled with waste. Now they are bothered by the nighttime operations. Although the authorities have promised to relocate people from their barracks to city flats, most villagers still live next to the landfill.

UNANSWERED QUESTIONS

Where is waste taken and disposed of? The waste removal process must be overseen by environmentalists and sanitary doctors. Industrial waste and municipal waste must be taken to different landfills. Standards for landfill insulation are higher for industrial waste, and Uzbekistan has only one landfill in Jizzakh Region which meets these standards; taking waste there is expensive because of the distance. But dumping all waste in Chirchik Region nearby can cause hazardous soil and groundwater pollution.

A year has passed, and the landfill is still non designated as such in the Land Cadaster; sanitary doctors and environmentalists continue to look the other way, and only two waste sampling surveys have been undertaken upon the Advisory Council's insistence, while a working group that the khokimiyat was instructed to set up in February to assess the Yunusabad Business City Directorate's performance in terms of cleaning up the landfill never came to be.

Environmentalists made two reconnaissance trips to measure samples last winter at the insistence of the Public Council. The working group, which, according to the instructions in the khokimiyat of the Deputy Chairman of the State Committee for Ecology of 31 December 2020, had to evaluate the work of the customer - the Directorate of the Yunusobod Business City multifunctional complex - to clean up the landfill in February 2021, was not created and did not evaluate anything.

The public expected the project documents to be submitted to the State Ecological Expertise with a detailed study of the project area, and its inclusion as a waste disposal site in the State Cadastre until the land was cleared. But this did not happen.

The Uzbek people have deep respect for foreign investors but expect compliance with the country's law and public health standards. The city should first clear the territory and only then offer it to domestic or foreign developers for deep-foundation construction in accordance with the law.

Today, in addition to the Khasanbay and Yunusabad dumps (waste landfills), a 10-hectare Yashnabad dump has been identified.¹¹

In addition to these three, there are others in the city that are not "noticed" by the cadastral services. "Not noticed" are not included in the land registry and in the cadaster of landfills, which is maintained by the State Committee for Ecology, which means that they can be distributed for construction. If the media "emerge," then they must be put in place.¹²

The State Committee of the Republic of Uzbekistan on Ecology and Environmental Protection held a press conference on the state of affairs and strategies in the field of waste management for 2019-2028 on 28 June 2021. In particular, it was reported that 167 landfills with a total area of 1109 hectares will be closed and reclaimed in Uzbekistan, and 59 new landfills with an area of 773 hectares will be created. It was said that \$ 928 million would be required to optimize landfills and build new landfills.

The leadership of the State Committee for Ecology was asked a number of questions, including those regarding the development of urban landfills. However, it was not said in response whether it was planned to study them and include them in the inventory.

What next steps can be taken to clarify these issues? Appeal to the Prosecutor's Office of the Republic, which oversees the implementation of legislation in the country, public hearings that can be organized by public councils under the State Committee for Ecology and under the Tashkent city administration, sending decisions of public councils to the Cabinet of Ministers, drawing attention on social networks to issues of compliance with legislation.

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¹² "Подать в суд на редакцию пригрозила Дирекция ГУП 'Yunusobod Business City,'" *Novosti Uzbekistana*, June 26, 2021, <https://nuz.uz/obschestvo/1201806-podat-v-sud-na-redakciyu-prigrozila-direkciya-gup-yunusobd-business-city.html>.

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