

Nadira Dzhumadylova**Senior Lecturer**Bishkek State University named after Academician Kusein Karasaev**720044, 27 Ch. Aitmatov Ave., Bishkek, Kyrgyz Republic**<https://orcid.org/0009-0007-5929-9245>*

Integration diplomacy of the Kyrgyz Republic within the EAEU: A compensatory function, institutional ballast and the transition to smart integration

Abstract. The relevance of the research is determined by the gap between the formal legal equality of small states in asymmetric integration blocs and their real ability to exercise sovereignty. The purpose of the study was to identify the role of integration diplomacy in minimising risks to the sovereign capacity of the Kyrgyz Republic within the framework of the Eurasian Economic Union (EAEU), as well as to substantiate the transition to a model of “smart integration” as a tool for strengthening political security. The methodological basis was a combination of institutional analysis of the three-tier regulatory framework of the country, typological analysis of risks to sovereign capacity in four dimensions, political analysis of macroeconomic indicators and SWOT analysis. The results were compared with data of international organisations and state bodies of the Kyrgyz Republic. The study showed that the institutional design of the Kyrgyz Republic’s participation in the EAEU is characterised by a mainly reactive attitude of the state, which is a manifestation of institutional inertia. The three-tier hierarchy of the regulatory framework is subject to structural constraints at each level, which, when aggregated, constrain the country’s diplomatic initiative in supranational bodies. The Jogorku Kenesh of the Kyrgyz Republic, which is constitutionally empowered to oversee the implementation of international treaties, is not being fully utilised as a mechanism for substantive oversight of the implementation of EAEU regulations; this represents a constitutional and political challenge, rather than merely an administrative one. Simultaneous membership of the EAEU, the Collective Security Treaty Organisation (CSTO) and the Shanghai Cooperation Organisation (SCO) is interpreted as a form of forced institutional hedging: the compensatory function of these frameworks serves as a temporary substitute for sovereign capacity, whilst the transition to informed sovereign participation requires the development of diplomatic capacity through “smart integration” model. The practical significance of this research is determined by the development of analytical tools applicable to assessing the alignment of the institutional design of integration participation with the economic potential for union membership in other small states with similar structural characteristics

Keywords: integration diplomacy; compensatory function; sovereignty deficit; institutional ballast; political security; smart integration

Introduction

The growing role of regional integration organisations as key determinants of the political agency of small states in the post-Soviet space raises issues relating to the adaptation of diplomatic mechanisms to the requirements of integration. The transition to a “smart integration” model requires not only the existence of integration frameworks, but also the appropriate diplomatic infrastructure and institutional readiness to utilise them effectively. The author assumes that the institutional constraints identified are largely due to objective factors – the small size of the economy, a limited diplomatic service, and Kyrgyzstan’s relatively recent experience of participating in supranational structures. The aim of this section is not to offer

criticism, but rather to systematise existing approaches and to justify a research framework that can be used for identification of areas for growth to strengthen the country’s diplomatic agency within the framework of existing integration formats.

The literature on the trade effects of regional integration for small states provides consistent evidence of asymmetry in the benefits. A. Cieřlik & O. Gurshev (2023) showed that the expansion of the Eurasian Economic Union (EAEU) has formed a qualitatively new configuration of trade relations in Central Asia. Small member states have different trajectories of trade integration from the founding states of the union. Their positions in negotiation

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*Corresponding author (N.Dzhumadylova1@gmail.com)



processes and their ability to adapt trade policy to the conditions of an expanded market are limited by institutional and resource factors. The authors also pointed out that from 2009 to 2019, close to 50% of the exports of the Central Asian republics were still directed to post-Soviet partners within the Commonwealth of Independent States (CIS), which indicates ongoing trade dependence rather than diversification. On a broader aspect, M. Sultonov (2026) proved the existence of a strong causal link between the dynamics of international trade and economic growth through a panel data on Central Asian economies over a long period but pointed out the asymmetric nature of the study depending on the quality of the institutional framework of the trade regime: in countries with more developed trade institutions, the growth effect is more significant and more resistant to external shocks.

The specific characteristics of the Kyrgyz Republic as a small, doubly continental economy within an integration bloc were examined by P. Athukorala & H. Hill (2023), who demonstrated that the geographical location of the country – which lacks direct access to the sea and is dependent on the transit infrastructure of neighbouring states – simultaneously creates transit opportunities for re-export and structural barriers to the full utilisation of EAEU trade preferences: high transport costs, dependence on the quality of border administration, and limited logistics infrastructure reduce the competitiveness of Kyrgyz exporters even in a formally open market. These findings are complemented by research by S. Bekbolotova *et al.* (2025), who, using a dynamic multilevel model with a latent factor, established that membership of the EAEU increased the aggregate exports of both Armenia and Kyrgyzstan; however, the effects proved to be asymmetrical: Armenia recorded significant growth in agri-food exports, whilst the Kyrgyz Republic experienced a decline in agri-food imports, with no verified positive effect on agri-food exports or total imports. The authors noted that the impact of integration on trade in small economies is ambiguous and could not be used for definitive conclusions regarding net benefits of membership.

An analysis of empirical data on individual sectors of the Kyrgyz economy traced how integration processes are transforming specific economic practices. A. Beksultanov *et al.* (2026), using data on tax, trade and financial reforms in the Kyrgyz Republic, found that integration into the EAEU had stimulated the modernisation of fiscal administration; however, the effects achieved are limited to specific sectors due to insufficient administrative capacity: new regulatory instruments operate predominantly in the formalised segment of the economy, whilst the informal sector remains largely outside their scope. A. Dooranov *et al.* (2024) developed a methodology for ranking the export potential of regions of the Kyrgyz Republic, and applied it to data for 2019–2023. The results show significant internal disparities: the greatest progress was recorded in the Batken, Jalal-Abad and Talas regions. The authors observed that although the implementation of tax reforms and investment in infrastructure generate positive conditions for exports, the structural differences between regions continue to persist in the absence of targeted government initiatives, suggesting that the benefits of integration are only being realised to a limited extent

at the sub-national level. Y. Jin & X. Meng (2023) explored the effect of external shocks on economic resilience of small states' integration blocs using a computable general equilibrium model to simulate the effect of multilateral trade sanctions after the Russian invasion of Ukraine. The authors theoretically justified and quantitatively confirmed the existence of structural incentives for joint sanctions in the economic interdependence of multilateral blocs. Simulation results showed that the interdependencies between the US and its allies were strengthened in the regime of sanctions, especially at the level of production.

K.K. Zhusupbaev & B.T. Toktobaev (2025) investigated the application of international customs transit regulations in the legal system of the Kyrgyz Republic. Their research revealed contradictions between the EAEU regulations and national procedures, resulting in administrative delays in transit clearance and structural barriers that hinder the utilisation of the country's transit potential. The authors noted that the time taken for transit procedures when moving goods by rail in the Kyrgyz Republic amounts to approximately 24 hours, which reduces the competitiveness of the Kyrgyz transit corridor compared with alternative routes. N. Komendantova *et al.* (2022) demonstrated that regional connectivity processes in Central Asia have multiple and interdependent effects on Kyrgyzstan's sustainable development, encompassing not only economic and infrastructural but also institutional dimensions; however, they noted the absence of a comprehensive methodology that would be used for a systematic assessment of the governance and economic implications of such processes for small states in the long term.

Thus, despite the existence of quantitative studies in this field, the issue of small states' participation in the EAEU is addressed in the academic literature primarily in a piecemeal manner. The basis for such research may be found in the economic study of small states, an analysis of their institutional characteristics, and an examination of how internal factors influence the vulnerability of small states to external economic shocks. Studies on Kyrgyzstan are largely limited to examining individual aspects of the country and specific forms of its participation in various organisations. Consequently, the analytical framework linking the quality of institutional design to the realisation of political agency and defining the conditions for a transition to "smart integration" has remained insufficiently developed. This study aimed to develop and test an analytical framework linking the institutional design of integration participation with the configuration of risks to sovereign capacity and the conditions for a transition to a diplomatically active model of participation in an asymmetrical union, using the Republic of Kyrgyzstan as a case study. The following tasks were set as part of the study: analyse the institutional framework governing the Kyrgyz Republic's participation in the union at the constitutional, legislative and strategic levels through the lens of diplomatic agency; assess the economic effects of membership as political indicators of restrictions on sovereignty; develop a typology of risks to sovereign capacity.

Materials and Methods

This study was conducted as a single-case study incorporating elements of institutional and political-diplomatic

analysis. The Kyrgyz Republic was selected as the subject of the study on three grounds. Firstly, the country is the only state in the post-Soviet space to be a member of three asymmetric integration frameworks simultaneously – the Eurasian Economic Union, the Collective Security Treaty Organisation (CSTO) and the Shanghai Cooperation Organisation (SCO) – which creates the conditions for testing the concept of the compensatory function and institutional hedging in their most pronounced form. Secondly, the combination of formal, equal membership with limited diplomatic capacity and an underdeveloped analytical infrastructure within the Ministry of Foreign Affairs and the Government makes the Kyrgyz Republic a representative example of the constraints on sovereign agency characteristic of small post-Soviet states in asymmetric alliances. Thirdly, the availability of verified official sources provides a sufficient basis for the political interpretation of economic data as indicators of sovereign capacity. The choice of this single case study is justified by the structural characteristics of the Kyrgyz Republic – formal membership coupled with *de facto* limited agency, dependence on the compensatory function of three formats, and a reactive diplomatic model – render this case methodologically representative for testing the proposed analytical framework in the context of the most pronounced configuration of the phenomena under study.

The analytical focus of the study is unevenly distributed across three formats: The CSTO and the SCO are examined in the first part from a functional perspective – as elements of an institutional hedging framework, enabling the verification of the thesis regarding the compensatory nature of the Kyrgyz Republic's multi-format participation, whilst the second and third parts focus exclusively on the EAEU. This methodological decision is driven by two factors. Firstly, the EAEU is the only one of the three frameworks to possess a verified and systematically published official statistical database, which is necessary for the political interpretation of economic data as indicators of sovereign capacity. Secondly, it is within the EAEU that the institutional framework for the Kyrgyz Republic's participation is most formalised through a three-tier regulatory architecture, making it the optimal subject for analysing the relationship between regulatory capacity and operational diplomatic agency.

The study was conducted using four sequential methods. Institutional analysis was employed to examine the institutional framework governing the Kyrgyz Republic's participation in the EAEU at three levels: constitutional, legislative and strategic. The source base for the regulatory and legal analysis comprised documents at three levels. The constitutional level is represented by the Constitution of the Kyrgyz Republic (2021), which stipulates powers of state bodies in the sphere of foreign policy. The legislative level is examined through Law of the Kyrgyz Republic No. 96 "On the Interaction of State Bodies in the Sphere of Foreign Policy of the Kyrgyz Republic" (2012), which delineates the competences of key actors in integration. The strategic level is represented by the Concept of Foreign Policy of the Kyrgyz Republic (2019), which defines integration priorities, and the Decree of the Ministry of Justice of the Kyrgyz Republic No. 221 "On the National Development Strategy of the

Kyrgyz Republic for 2018-2040" (2018), which stipulates long-term economic development guidelines in the context of union membership. The regulatory framework for integration is confirmed by the Treaty on the Customs Code of the Eurasian Economic Union (2018) and the documentation on the Kyrgyz Republic's accession to the Union (Eurasian Economic Commission, 2015).

Macroeconomic analysis was used to assess the economic effects of the Kyrgyz Republic's membership of the EAEU across four dimensions: trade, migration, re-exports and the budget. The data sources for the macroeconomic analysis comprised three groups of sources. Trends in the Republic of Kyrgyzstan's key economic indicators were verified using official data from the National Statistical Committee and the annual report of the National Bank of the Kyrgyz Republic (2025). The fiscal dimension of integration participation was confirmed using documentation from the Eurasian Economic Commission (EEC) on the distribution of customs revenues (Eurasian Economic Union, 2020). The assessment of the re-export dimension and external risks is based on the International Monetary Fund's (2025) Mission Report on Article IV consultations. Foreign trade potential has been verified using the EAEU-Indonesia Agreement (Eurasian Economic Union, 2025).

A typological analysis was used to construct a structured classification of integration risks. The four dimensions identified – regulatory, fiscal, external shocks and institutional – correspond to the four mechanisms through which union membership affects the national economy: regulatory harmonisation, the redistribution of budgetary revenues, dependence on external economic conditions, and the quality of public governance of integration participation. This distinction makes it possible to correlate each type of risk with a specific level of institutional design and to identify the appropriate tools for minimising it within the framework of the Union's existing treaty base. The source base comprises an analytical report on the impact of the Kyrgyz Republic's accession to the Center for International Private Enterprise (CIPE, 2020), documentation on the EEC's regulatory impact assessment mechanism (Eurasian Economic Union, n.d.), as well as the sources of macroeconomic analysis.

The matrix analysis method was used to construct two analytical matrices. In the matrix of economic effects, each dimension is matched with a verified outcome, a key driver, the role of the state and the nature of institutional vulnerability; classification in the "role of the state" column was based on the degree of active participation by state bodies in shaping the relevant effect – ranging from a passive role of the state (deriving benefits through market mechanisms) to an active negotiating position within supranational bodies. The SWOT matrix systematises the internal strengths and weaknesses, as well as the external opportunities and threats, associated with the Kyrgyz Republic's participation in integration, based on the combination of sources used in the preceding methods.

Results

The institutional framework for the Kyrgyz Republic's participation in the EAEU. The institutional framework for the Kyrgyz Republic's participation in the EAEU is

shaped at three interrelated levels: constitutional, legislative and strategic. Their systematic interaction defines the framework within which the state fulfils its integration commitments, transposes supranational norms into domestic legislation and establishes a coordination framework for interaction between government bodies. The constitutional basis of integration is enshrined in the Constitution of the Kyrgyz Republic (2021), in Article 4 of which it is noted that the principles of international law and ratified international treaties are part of the country's legal system. Article 66 gives the President the right to determine the direction of foreign policy and to sign international treaties, and Article 77, assigns to the Jogorku Kenesh the functions of ratification, denunciation and control over the implementation of international treaties. The constitutionally established distribution of powers in the foreign policy sphere between the President, Parliament and the Government make up a formal system of checks and balances. But in practice, the functions often overlap, which can slow down the development of a coordinated position within the EAEU bodies.

At the legislative level, the basic law is the Law of the Kyrgyz Republic No. 96 (2012) that determines the powers of the main bodies: The President determines priorities (Article 4), the Jogorku Kenesh exercises parliamentary control (Article 5), the Government implements decisions at the administrative level (Article 6), and the Ministry of Foreign Affairs is the authorised coordinating body (Article 7). However, this law was drafted before the accession of Kyrgyz Republic to the Eurasian Economic Union and does not contain specific provisions on interaction with the supranational bodies of the Union. Therefore, the implementation of EEC decisions is carried out without a clearly defined mechanism: each EEC decision needs specific transposition into national regulations, which may lead to delays in the enforcement of laws and a decrease in the speed of reaction to integration-related changes.

The strategic framework is outlined in the Concept of Foreign Policy of the Kyrgyz Republic (2019). The document outlines six areas of integration priorities, with participation in the EAEU being the "strategic pillar of political and economic security". The Concept for the First Time Introduces the Concept of "Sustainable Development Diplomacy" and Provides for the Alignment of Goals of Foreign Policy with the Objectives Outlined in the Decree of the Ministry of Justice of the Kyrgyz Republic No. 221 (2018). Simultaneously, the concept, in spite of its declared integrationist orientation, does not possess operational criteria for the assessment of the effectiveness of participation in the union, nor does it contain mechanisms for the independent control of the commitments assumed. As research on the institutional dynamics of the EAEU has shown, the smaller states of the union, such as Kyrgyzstan, tend to follow a reactive rather than proactive stance: the activities of their delegations are mainly focused on agreeing to decisions made by the founding states (CIPE, 2020).

The mechanism of internal coordination for participation in the EAEU still remains a field for further institutional improvement. Coordination of positions between ministries before meetings of the Union's

bodies is irregular: representatives of ministries are often asked to take decisions at the last minute, without prior inter-ministerial discussion. A typical example is the process of discussing the Treaty on the Customs Code of the Eurasian Economic Union (2018), when the Kyrgyz side did not offer any significant amendments, considering that a number of provisions of the document affected the interests of national exporters and small businesses. The lack of special analytical structures in the Ministry of Foreign Affairs and the Parliament leads to the formation of national positions in supranational bodies without systematic justification and assessment of the impact. At the same time, the resources of civil society and science are hardly used in this process.

The human resource capacity in the area of integration management remains limited. Estimates made by the CIPE (2020) suggest that the Kyrgyz Republic does not sufficiently use the consultative process of the EEC in shaping the policy of the Union. Between 2021 and 2023, the number of departments within government bodies responsible for regulatory oversight has decreased from 60 to 23, indicating a trend towards the centralisation of regulatory functions (U.S. Department of State, 2025). Kyrgyzstan has no systematic training programme on integration diplomacy in the framework of the EAEU. No specialised analytical units have been created to deal with issues related to the functioning of the Union on a permanent basis. Unlike Kazakhstan and Belarus, where there are national centres for integration analysis, the institutional infrastructure for expert support of participation in the EAEU in Kyrgyzstan is at the initial stage of development. This means that the country's negotiating potential is not fully used and that the ability to manage the risks of membership is structurally limited already at the stage of institutional design. The analysis of the institutional framework of participation of the Kyrgyz Republic in the EAEU shows a certain contradiction: a formally high level of integration commitments is not fully supported by the institutional capacity to implement them. Constitutional provisions, sectoral legislation and strategic documents are an externally consistent hierarchical system. However, each level has structural constraints that cumulatively reduce the operational effectiveness of the country's participation in the union.

The 2012 Framework Coordination Act was developed prior to the accession of the Kyrgyz Republic to the Eurasian Economic Union and does not establish a mechanism for interaction with the supranational bodies of the Union. This creates a gap between the regulatory framework for inter-ministerial coordination and the current requirements for participation in the integration process. The state is part of one of the largest regional integration organisations without a legally established procedure for the implementation of its decisions – an issue that should attract the attention of the legislature. The institutional design of the Kyrgyz Republic's participation in the EAEU, in its present form, is more geared to the fulfilment of the existing obligations, rather than to the active receipt of the benefits and management of the risks of membership. This structural imbalance determines the nature of economic effects and response strategies discussed in the sections below.

Kyrgyzstan's foreign policy institutional framework does not stop with its participation in the EAEU. The country is also a founding member of two other multilateral organisations – the CSTO and the SCO – each of which has a specific function in the system of integration commitments of this small state. What is analytically important is that the intersection of these three frameworks (the EAEU, the CSTO and the SCO) creates a configuration of limited sovereign agency, in which Kyrgyzstan formally has a multi-vector international presence, but its proactive role in each of these frameworks is still limited. For Kyrgyzstan, the CSTO functions primarily in a compensatory mode in the security domain: a small state with limited defence capabilities is granted collective security umbrella without having to pay the commensurate cost for its maintenance. At the same time, as discussed in the academic literature, the CSTO as an institution is characterised by an asymmetry of influence: the organisation has been activated only once – during the January 2022 events in Kazakhstan – despite numerous previous crises, including the 2021 Kyrgyz-Tajik armed conflict, in the resolution of which the CSTO did not participate. In this framework, Kyrgyzstan plays more the role of the beneficiary of collective security than the role of its architect. Note that in January 2026 a citizen of Kyrgyzstan, Talaatbek Masadykov, was appointed the first Secretary General of the CSTO, which can be regarded as a positive change in the personnel policy of the organisation.

The SCO is a different dimension of institutional engagement for Kyrgyzstan. As a founding member (part of the “Shanghai Five” since 1996 and of the SCO since 2001), Kyrgyzstan has a historically privileged status within the organisation. The SCO agenda has shifted from border security to multi-sectoral cooperation in the fields of economy, counter-terrorism, digital policy and culture, which theoretically expanded the possibilities for Kyrgyz diplomacy. However, a similar structure is also visible. The Kyrgyz Republic participates in SCO summits at the presidential level, but its proactive role in shaping the organisation's agenda is limited by a lack of analytical and diplomatic capacity to engage meaningfully in structures dominated by China and Russia. Economic data are analytically different when they are read not as measures of integration effectiveness but as an indicator of the political agency of a small state. The re-export function of 23% of GDP in Kyrgyzstan can be viewed as a structural substitute for the negotiating power that the Kyrgyz Republic does not fully possess. A state that cannot secure special trade regimes or safeguard clauses for vulnerable sectors of the national economy compensates for this through intermediary functions that do not require active diplomatic engagement. In essence, transit customs revenue of 1.9% of GDP is a structural rent arising from the country's geographic position, which can be captured with very little institutional effort. Kyrgyzstan is reaping the benefits of those aspects of its membership of the EAEU, the CSTO and the SCO that do not require active diplomacy; however, the potential benefits in areas requiring active agency remain unrealised. Within the EAEU, this is reflected in a limited ability to shape the EEC's agenda, block unfavourable regulatory decisions or promote special arrangements for small economies. In

the CSTO, it is reflected in the fact that the organisation did not respond to Kyrgyzstan's requests for intervention in 2010 and did not participate in the resolution of the Kyrgyz-Tajik conflict in 2021. As for the SCO, the issue is that the status of a founding member does not translate into a proactive role within the organisation, where the agenda is set by China and Russia.

Simultaneous membership of the EAEU, the CSTO and the SCO is often interpreted as an expression of a multi-vector foreign policy. An alternative interpretation, proposed in this study, views this as a form of forced institutional hedging in the context of limited real alternatives. None of the three frameworks provides Kyrgyzstan with safeguards that are fully commensurate with the commitments it has undertaken: the EAEU restricts tariff autonomy; the CSTO does not guarantee military cover in bilateral conflicts with another member of the organisation; and the SCO does not compensate for the asymmetry in China's market influence. In this sense, the institutional design of the Kyrgyz Republic's participation in the three organisations replicates a similar configuration at the supranational level: a formally high level of obligations coupled with a structurally limited ability to influence their content and conditions of implementation. This configuration – the limitations on sovereign agency despite formal participation in key regional forums – is the central political conclusion, which the economic data illustrate but do not fully capture. Re-export figures and customs revenue figures describe the symptoms; a political diagnosis requires an analysis of the institutions, actors and mechanisms through which a small state exercises or fails to exercise its integrative agency. The structural constraints can be managed provided there is a shift from a reactive to a proactive model of integration diplomacy. In this study, integration diplomacy is defined as a system of targeted actions by state actors (the Ministry of Foreign Affairs, permanent missions to supranational bodies, parliamentary delegations and specialised agencies) aimed at creating the conditions for participation in an integration organisation, rather than adapting to decisions that have already been taken.

Concerning trade, a diplomatic tool for risk mitigation is the institutionalisation of a mechanism for technical negotiations: the establishment, within the Permanent Mission of the Kyrgyz Republic to the EEC, of a specialised group on phytosanitary and veterinary issues, authorised to initiate formal procedures to challenge the discretionary application of technical barriers. There is a precedent for such an instrument: statistics on appeals to the EAEU Court for the period 2015–2021 reveal an asymmetry in diplomatic activity: Russia initiated 32 appeals (63% of the total), Kazakhstan 12 (23%), whilst Kyrgyzstan lodged a single appeal (Eurasian Research Institute, n.d.). These statistics indicate that the smaller EAEU member states are not making sufficient use of the available mechanisms to protect internal interests.

Concerning the re-export dimension, the diplomatic instrument is preventive negotiation aimed at establishing sustainable transit corridors with verifiable guarantees: the inclusion of the transit function of the Kyrgyz Republic on the agenda for negotiations with the SCO and the EU as a separate item, rather than one derived

from the EAEU's common trade policy. Hypothetically, this could take the form of a bilateral memorandum with the EU on transit guarantees that are independent of the sanction's regime against third countries – an instrument similar to that used by Georgia to safeguard its transit function amid geopolitical instability. In the migration dimension, the diplomatic instrument is parliamentary diplomacy: the Kyrgyz delegation to the CIS Interparliamentary Assembly and the parliamentary dimension of the EAEU have formal channels for initiating amendments to mechanisms for the social protection of migrant workers, transferable pension rights, mechanisms for the mutual recognition of qualifications, and guarantees in the event of deportation. These instruments have not yet been utilised by the Kyrgyz Republic to substantively change the regulatory framework, although parliamentary delegations participate in meetings on a regular basis. In the budgetary sphere, one diplomatic instrument is to initiate a review of the formula for the distribution of customs revenues through the official channels of the EEC. This tool requires analytical capacity – the resource whose establishment within the Ministry of Foreign Affairs, in the form of a specialised centre for monitoring integration commitments, is a top-priority institutional measure.

Together, the instruments described above indicate that there is scope for the Kyrgyz Republic to pursue active integration diplomacy within the framework of existing institutional arrangements, without the need to revise its fundamental treaty obligations. At the same time, the transition to a proactive model faces internal barriers, including entrenched rent-seeking interests for which the current reactive model is a source of informal income. Shadow re-exports and discretionary customs administration create domestic pressure to maintain institutional weakness, which hinders the implementation of the proposed instruments. In this context, external pressure – in particular, the risks of secondary sanctions highlighted in reports by international financial institutions – may act as a catalyst for institutional change. Thus, the transition to a proactive model of integration diplomacy is not only a matter of the organisational design of the diplomatic apparatus, but also the result of the interplay between internal political and administrative barriers and external shocks capable of altering the structure of incentives for key decision-makers.

Economic indicators of restrictions on sovereign capacity. The Kyrgyz Republic's accession to the EAEU in 2015 represented not only a decision relating to foreign trade, but also a fundamental political choice: a small state with a limited domestic market and a high dependence on foreign trade voluntarily exchanged a significant amount of regulatory authority for access to a common market with a combined GDP of over USD 2.4 trillion (Eurasian Economic Commission, 2015). The Single Customs Space and the regime of free movement of goods, services, capital and labour have created a fundamentally different external economic environment; however, at the same time, they have transferred a significant portion of regulatory powers to a supranational body – the EEC – whose decisions the Kyrgyz Republic is obliged to implement. It is precisely this balance – formally equal

membership alongside a de facto asymmetrical distribution of regulatory influence – that defines the political framework within which the subsequent economic data should be interpreted. The measurable effects of integration participation are distributed across several key dimensions: trade, re-exports, migration, the budget and foreign trade. What is analytically significant is not so much the absolute scale of these effects as the extent to which they reflect the Kyrgyz Republic's active diplomatic agency, as opposed to the structural rent derived from its geographical location.

In trade terms, accession to the EAEU has had a statistically significant impact. The removal of customs barriers with Russia and Kazakhstan has opened new opportunities for national exporters in the textiles, dried fruit and dairy sectors (Vasudevan & Manalaya, 2021). By the end of 2023, the volume of mutual trade with member states stood at USD 4.4 billion; Kyrgyz exports to the union's countries increased from USD 642 million in 2019 to more than USD 1.2 billion in 2023, whilst the total volume of foreign and mutual trade reached USD 15.7 billion, an increase of 29.9% compared with 2022 (National Statistical Committee of the Kyrgyz Republic, 2024). At the same time, the structure of export growth largely mirrors the Kyrgyz Republic's pre-integration commodity specialisation, which highlights the need for a more targeted diversification policy. The country's GDP exceeded USD 15 billion in 2023; however, this macroeconomic growth has not yet been accompanied by a commensurate strengthening of the Kyrgyz Republic's negotiating position within the EAEU bodies.

Trade data indicate that export growth is primarily market-driven from an integration diplomacy perspective, but targeted diplomatic support of exporters has not yet been sufficiently institutionalised. The Ministry of Foreign Affairs of the Kyrgyz Republic does not have specialised mechanisms for trade diplomacy. The systematic delays at the Kyrgyz-Kazakh border, which have been recorded for several years, were not resolved through formal diplomatic channels. This is typical for small states with limited diplomatic resources, but could be addressed through the establishment of specialised trade diplomacy mechanisms within the Ministry of Foreign Affairs. Crucially, positive trade trends are not consistent across all sectors. Kyrgyzstan is still predominantly a supplier of raw materials and products with low added value. In 2023, exports of goods reached USD 3.3 billion, while imports amounted to USD 12.4 billion, leading to a chronic structural trade deficit (Lloyd's Bank Trade, 2024). A large proportion of Kyrgyz producers of dairy products, meat, vegetables and fruits still do not comply with the EAEU's phytosanitary and veterinary requirements to access the markets of member states (U.S. Department of Agriculture, 2024). This signals the absence of institutional support to help domestic producers adapt to the Union standards. This problem is also demonstrated in the Kyrgyz-Kazakh border situation, where Kyrgyz exporters face inconsistent application of customs requirements (U.S. Department of State, 2025). Kyrgyzstan's only overland route for exports to other member states is also a point of vulnerability requiring more active diplomatic attention.

With participation in the EAEU, the Kyrgyz Republic receives economic benefits through a special channel of re-exports. The statistics are impressive. The total volume of exports increased by 21.3% in the period from January to November 2024. In October 2024, the record high for monthly exports of USD 1,027.1 million was recorded, which is more than twice the average monthly figure for the entire post-Soviet period of USD 121.9 million (Trading Economics, 2026). But from a political point of view, this growth is more a consequence of external circumstances than the result of a targeted strategy. The sanctions pressure on Russia after 2022 has redirected part of the trade flows through the territory of Kyrgyz Republic, giving the country an intermediary niche, which it had not actively sought to create. The country is capable of adapting quickly to changing conditions, which shows that administrative capacity is present, but it requires institutional consolidation to reduce its dependence on external factors. The re-export activity of the Kyrgyz Republic creates risks beyond the control of the sovereign: a possible tightening of secondary sanctions could in the short term erase the trade benefits currently being reaped.

At the same time, it is important to note analytically that the growth of re-exports between 2022 and 2024 does not mean that the state has taken a completely passive position. Imposition of sanctions against Russia required prompt reorganisation of customs administration, banking support to transit operations and registration of a large number of new entities carrying out foreign economic activity. This is a sort of clandestine state agency not formally documented in strategic documents on integration policy: the administration acted quickly but not through diplomatic channels of the EEC but through administrative mechanisms at the national level. This duality – active management of transit flows and simultaneously the absence of formal negotiating initiatives within the EEC – is the distinctive feature of the Kyrgyz model of participation.

From the perspective of integration diplomacy, the re-export data indicate that the re-export model was not the subject of strategic planning: it is not enshrined in official integration policy documents, nor is it accompanied by diversification mechanisms to cope with changes in the external environment. A state whose key export strategy is largely determined by external factors faces constraints on its sovereign capacity to act. At the same time, this creates opportunities for the development of a more informed and institutionalised strategy for managing transit flows.

The migration dimension is the effect of EAEU membership with the widest reach in terms of the population. Article 97 of the Treaty on the Customs Code of the Eurasian Economic Union (2018) enshrined the principle of equal treatment of workers from member states, including the recognition of educational qualifications, equal access to social insurance and a simplified procedure for concluding employment contracts. In 2024, remittances from labour migrants amounted to USD 2,543.7 million, up 18.6% compared to 2023. This figure is an economic indicator, and is also a measure of the social importance of the migration channel. The social stability of the Kyrgyz Republic is largely dependent on the working conditions of migrants in the host countries, which entails some

risks. Kyrgyz Republic does not have specialised labour diplomacy institutions attached to its permanent missions in member states, nor does it have verified mechanisms for monitoring the working conditions of Kyrgyz migrants. Article 97 of the Treaty on the Customs Code of the Eurasian Economic Union formally enshrines equal rights for workers, which requires more active diplomatic support in practice. The negotiating position of the Kyrgyz Republic on labour mobility issues within the EAEU bodies is still largely reactive, which highlights the scope for further strengthening of parliamentary and diplomatic efforts in this respect.

The budgetary dimension and the re-export function together make a significant picture. The International Monetary Fund (2025) estimates that unrecorded re-exports of goods imported from third countries without customs declaration were about 23% of GDP in 2024. Adjusting for this unrecorded trade flow, the existing account deficit reduces to about 8% of GDP, compared to a nominal figure of 30.7% of GDP. The gap between the nominal and real deficits, at 22.7 percentage points of GDP, indicates that a significant share of economic activity is not fully accounted for by state control. The budget is supplemented by revenue from the distribution of import customs duties, but the volume is determined by a formula agreed at the supranational level. In terms of integration diplomacy, the budgetary figures give grounds to suggest that the Kyrgyz Republic should more actively participate in negotiations on the distribution of customs revenue and tighten control over the customs territory.

An additional source of economic benefits is the expansion of the Union's agreements in foreign trade. The signing of the free trade agreement of the EAEU with Indonesia in December 2025 will give preferential access to 90% of the product range for Kyrgyz exporters, and the average import duty rate will be reduced from 10.2% to 2% and the official forecast of the EEC expects a doubling of trade turnover within 3-5 years (Eurasian Economic Union, 2025). At the same time the agreement with Indonesia is the result of negotiations undertaken by the EEC. The Kyrgyz Republic benefits from the expansion of its export markets, but its participation in determining the terms of market access needs to be strengthened further. This analysis clearly shows the main thesis of this study: the economic benefits of the EAEU membership are real, but their sustainability and long-term impact depend on the degree of the country's diplomatic engagement in shaping the conditions of such access.

An analysis of the economic effects of the Kyrgyz Republic's membership of the EAEU has revealed a pattern: the decisive factor is not the formal extent of access to the common market, but the nature of the state's sovereign agency in exercising that access. A similar pattern is observed across each of the dimensions: an economic effect is present, but it is either determined by external market conditions, is the result of supranational regulation, or is realised without active diplomatic involvement on the part of Kyrgyzstan. To systematise the identified relationships, a matrix has been constructed in which each dimension of the economic effect is matched with a verified result, the main driver, the role of the state and the nature of institutional characteristics (Table 1).

Table 1. Matrix of the economic effects of the Kyrgyz Republic's participation in the EAEU

Metric	Verified effect	Primary driver	Role of the government	Institutional peculiarities
Trade	The volume of trade with EAEU member states amounted to USD 4.4 billion	Mixed: market demand + removal of tariff barriers	Partial: requires active protection against technical barriers and sanitary restrictions	Average: narrow product concentration in exports, delays in certification
Re-export	Export growth: +21.3%	Opportunistic: impact of sanctions against Russia after 2022	Passive: use of external market conditions	Critical: dependence on the sanction's regime remaining in place
Migrational	Remittances of USD 2,543.7 million; an increase of 18.6%	Market: private initiative by migrant workers	Passive: established regulatory framework	High: dependence on decisions of Russia and Kazakhstan
Budgetary	Revenue growth driven by re-exports	Normative: EEC fixed allocation mechanism	Weak: absence of mechanisms for reviewing the share	Structural: actual transit contribution exceeds the allocated share
Foreign trade agreements	Agreement with Indonesia (2025): reduction of the average import duty rate from 10.2% to 2%	Negotiation: proactive stance of EEC	Passive: Agreement was established by the EEC	Moderate: Implementation depends on administrative capacity

Note: categories “Role of the government” and “Institutional peculiarities” reflect the political dimension of the observed effects; economic data are regarded as indicators of sovereign capacity

Source: compiled by the author based on Treaty on Eurasian Economic Commission (2015; 2024), Customs Code of the Eurasian Economic Union (2018), National Statistical Committee of the Kyrgyz Republic (2024), National Bank of the Kyrgyz Republic (2025), National Statistical Committee of the Kyrgyz Republic (2025), Eurasian Economic Union (2025), International Monetary Fund (2025), T. Weiss & S. Fernandes (2025), I. Jipa-Muşat & N. Piper (2026)

Matrix identified a structural pattern that underpins the logic of the Kyrgyz Republic's economic participation in the EAEU. The largest quantitative effects are in regions with passive states: remittances and growth in re-exports. In areas requiring active institutional participation, such as the promotion of exporters' interests, the definition of the country's role in the EEC, and the contesting of the distribution of customs revenues, results are still limited. This speaks to a specific profile of the political capacity of the state: the Kyrgyz Republic effectively uses those aspects of membership that do not involve active diplomatic intervention, and has difficulties with those where such intervention is required. Viewed in the aggregate, the economic data point to a pattern with major political implications. The benefits of the EAEU membership are concentrated in the areas least affected by the state regulation. Labour migration and re-exports are driven mostly by private initiative and market mechanisms. But where sovereign agency is needed – in protecting the interests of exporters against technical barriers, in negotiations over the distribution of customs revenue, and in shaping the EEC's agenda – the potential is not being realised. Standard macroeconomic indicators (GDP growth, remittance volumes, export trends) point to a positive scenario, but structural limitations are hidden behind these aggregate figures. The economy of the Kyrgyz Republic benefits from the EAEU in scenarios beyond its control, and excludes potential benefits in scenarios where sovereign agency could change terms of participation. The diplomatic and institutional challenge is to redress this imbalance and to move away from a reactive to a proactive model of integration.

Alongside the institutional constraints and structural imbalances that have been identified, an analysis of the Kyrgyz Republic's participation in the EAEU also reveals a number of positive aspects that form the basis for further institutional development. Firstly, membership of the union has given Kyrgyzstan access to a common market with a combined GDP of over USD 2.4 trillion, which has created the conditions for an increase in the volume

of mutual trade: between 2019 and 2023, the Kyrgyz Republic's exports to EAEU countries more than doubled – from USD 642 million to USD 1.2 billion. Secondly, the country has successfully utilised its geographical position as a transit hub, which, in the context of sanctions pressure after 2022, increased export shipments by 21.3% and recorded a historic high in monthly exports. Thirdly, EAEU mechanisms – including the free trade agreement with Indonesia (2025), which grants preferential access to 90% of the product range – create real opportunities for diversifying foreign economic ties, which, provided diplomatic agency is strengthened, can be utilised more fully. Fourthly, the migration channel via the EAEU ensures a stable inflow of remittances (USD 2.54 billion in 2024), supporting the country's social stability and balance of payments. Lastly, formal right to an equal vote in the Union's bodies, enshrined in the EAEU Treaty, remains a legal resource which, once the necessary analytical and human resources infrastructure is in place, can be converted into a genuine strengthening of negotiating positions. Thus, despite structural constraints, Kyrgyzstan's participation in the EAEU generates measurable economic benefits and offers institutional opportunities, the realisation of which requires targeted diplomatic efforts and a transition to a model of “smart integration”.

Typology of threats to sovereign capacity and strategies for enhancing the Kyrgyz Republic's agency.

The Kyrgyz Republic's participation in the EAEU creates a range of challenges to its sovereign capacity, the nature of which is determined by a combination of internal institutional constraints and external structural factors inherent in an asymmetrical integration bloc. It is necessary to recognise that these are not merely administrative challenges amenable to technical solutions, but systemic constraints on the political agency of a small state: each of the identified types of threat narrows the scope for the Kyrgyz Republic's sovereign choice in the legal, fiscal, strategic or political spheres. The shift from reactive adaptation to consciously-managed domestic agency within the

union requires not only institutional modernisation, but also a conceptual redefinition of the role of the state: from passive implementer of supranational norms to active architect of the conditions of participation in integration – a concept known as “smart integration” in international relations theory.

The first type of threat – the threat to legislative sovereignty – is associated with the limited state control over the domestic legal field, which is due to the inconsistency of the EAEU regulations with the national legislation. Unlike the legal systems where international treaties have direct effect, in Kyrgyzstan, each decision of the EEC must be transposed through national procedures: adoption of subordinate legislation, amendments to departmental regulations and adjustments to administrative procedures. This leads to systematic delays and legal gaps: the provisions of the Treaty on the Customs Code of the Eurasian Economic Union (2018) are not automatically applied and have to be transposed separately into national legislation, which reinforces administrative barriers and reduces the predictability of the regulatory environment. The lack of institutionalised parliamentary oversight of the implementation of integration norms further endangers the procedural legitimacy of this process. The basic political conclusion is this: a state that does not control the mechanism for implementing domestic international obligations and does not have a parliamentary mechanism for checking them is *de facto* limited in its legislative sovereignty, even when it is formally equal to the other members of the union. The Jogorky Kenesh as the body constitutionally empowered to ratify and oversee the implementation of international treaties, is not currently being fully utilised as a mechanism for substantive oversight of how EAEU provisions are transposed into domestic law. This poses not only an institutional challenge, but also a constitutional and political one.

The second type of threat – threat to budgetary sovereignty – stems from the mechanism of distribution of customs revenue, where the Kyrgyz Republic has limited possibilities to challenge or revise the parameters allocated to it. The share of the Kyrgyz Republic in the distribution of import customs duties is 1.9%, which, given the significant volumes of Chinese goods transiting through the territory of the country, does not reflect the real contribution of the Kyrgyz Republic to the formation of the customs pool of the Eurasian Economic Union (2020). Significantly, this share was established at the time of accession of the Kyrgyz Republic to the Union and has not been revised since, even taking into account the growth of transit flows through the country’s territory after 2022. A state that possesses neither the legal mechanism to challenge the distribution formula nor the political resources to initiate its revision faces constraints in controlling one of its key sources of budgetary revenue – and this is precisely where the threat to budgetary sovereignty lies. The broader political issue is that independent experts are not sufficiently involved in assessing the fiscal implications of integration decisions, and budget planning relating to the EAEU remains reactive in nature. This means that, when ratifying agreements, the Jogorky Kenesh does not always have access to verified independent assessments of their fiscal implications; consequently, parliamentary oversight of integration commitments in terms of their budgetary

implications is largely a formality. A state that assumes financial obligations within the framework of a supranational union without a systematic prior analysis of their implications and without a mechanism for subsequent review faces constraints on its sovereign budgetary planning to the extent that such planning is determined by integration decisions – that is, to an ever-greater extent as the union deepens.

The third type of threat – the threat to strategic autonomy – emerged during the period when large-scale sanctions packages were imposed on Russia between 2022 and 2024, and highlighted the fundamental contradiction underlying a small state’s participation in an asymmetrical union. As a member of the EAEU, Kyrgyzstan is in an ambivalent position: on the one hand, there was a real risk of a sharp decline in re-export operations, a fall in remittances from migrant workers and a drop in budget revenue from customs duties; on the other, an opportunity to use the transit status to expand alternative trade flows became apparent, which Russia sought to establish in circumvention of sanctions (International Monetary Fund, 2025). Neither the first nor the second scenario was the result of a sovereign strategic choice: both were initiated by decisions of external actors – Western governments imposing sanctions, and the Russian government creating demand for transit schemes. Kyrgyzstan adapted to both scenarios, but its ability to manage them was limited.

A distinction must be made between two kinds of restrictions on sovereign capacity which are often conflated in official discourse, and even in some of the academic literature. The first is structural dependence, arising from an asymmetry in economic potential, dependence on external labour and capital markets, and the geopolitical dominance of major powers within the union. This dependence is objective and cannot be eliminated by institutional reforms in the Kyrgyz Republic – it can be overcome in the long term only by diversifying foreign economic ties and developing national productive capacity. The second type – institutional ballast (the actual subject of this analysis) – consists of a set of accumulated constraints relating to diplomatic infrastructure, staff training and inter-agency coordination, which, unlike structural dependence, can be addressed through managerial adjustments in the medium term. The key conclusion of this typology is that Kyrgyzstan faces constraints on its agency not only in those areas where its negotiating positions are objectively weak due to dependence (for example, in matters of energy pricing), but also in those where formal mechanisms of influence exist and are not blocked by dependence (recourse to the EAEU Court, the initiation of regulatory assessments, and parliamentary oversight of implementation). In the second case, a move towards smart integration is a realistic strategy. This is the threat to strategic autonomy: a state whose economic model is largely determined by geopolitical conditions shaped by others faces constraints on its sovereign strategic planning. The re-export rush of 2022–2024 is not evidence of diplomatic activity on the part of the Ministry of Foreign Affairs or a strategic decision by the President – it is a consequence of external circumstances that may change just as suddenly as they arose. The risk of Western states tightening secondary sanctions against intermediary schemes could rapidly

reduce existing re-export flows to zero, and this risk also remains outside Bishkek's sovereign control. A state whose strategic position is largely determined by external conditions faces limitations on its strategic autonomy in the political science sense of the term, regardless of how successful its adaptation to current circumstances may appear. The lack of contingency planning in the event of changes to the sanction's regime, as noted in the analysis of institutional design above, highlights the need to develop strategic forecasting.

The fourth type of threat – the threat to political capacity – is the most systemic of the four, as it determines not just a specific aspect of the Kyrgyz Republic's participation in the EAEU, but the very ability of the state to function as a sovereign actor within any of them. Weak inter-ministerial coordination, a shortage of professional staff capable substantive efforts within supranational bodies, and the lack of an analytical infrastructure within the Government and the Jogorku Kenesh do not merely reduce administrative efficiency – they limit the state's political capacity as such: its ability to formulate well-founded positions, defend national interests in negotiation processes and take sovereign decisions based on independent expert analysis, rather than under conditions of information dependence on alliance partners. To this is added the corrupt practices in the customs service and in the law enforcement agencies, which bring the problem to the political level rather than the institutional level. The state, in which a significant part of economic activity is carried out in the shadow economy, suffers not only losses of budgetary revenue, but also the limitations of its ability to control the domestic economic sphere. The shadow economy, which accounts for a large portion of trade in

the Kyrgyz Republic and is not covered by the mechanisms of the EAEU (CIPE, 2020), continues to create a persistent gap between macroeconomic formal indicators and the real manageability of the processes of integration. This gap has political consequences: the state promises things it cannot deliver, and then reports on outputs it does not control. This lack of political capacity is not a matter of isolated administrative failures but of a structural feature of the state, the institutional design of which has not been adapted to the needs of full sovereign participation in a supranational union. Staff shortages, corruption and the shadow economy do not exist in isolation – they form a single configuration in which the state faces constraints on its sovereign capacity: whilst formally remaining an equal member of the union, it struggles to formulate and direct regulatory measures in internal interests.

The typology of threats to sovereign capacity reveals a systemic character that defines the political logic of the Kyrgyz Republic's participation in the EAEU. While each of the four types of threat limits the sovereign choice in one separate dimension, they form a mutually reinforcing configuration that constrains the state's agency in all dimensions at the same time. To provide a complete assessment of this configuration, it is necessary to have a synthetic analytical tool capable of simultaneously identifying the internal resources and constraints on the sovereign agency of the Kyrgyz Republic, as well as the external opportunities and threats arising from the architecture of the union and the geopolitical context. For these purposes, a SWOT matrix was constructed, systematising the key determinants of the Kyrgyz Republic's integration policy through the prism of its political agency, rather than purely economic performance (Table 2).

Table 2. SWOT analysis of the Kyrgyz Republic's integration policy within the Eurasian Economic Union

Strengths	Weaknesses
Strategic geographical location at the crossroads of the China-Russia-Central Asia routes, offering strong re-export potential	Lack of specialised analytical bodies within the Ministry of Foreign Affairs and the Government to review EEC decisions prior to their adoption
Formal equal voting rights within the EAEU bodies, including the EEC and the Interstate Council, as legally enshrined in the Treaty on the EAEU	Poor inter-departmental coordination: positions are formulated without prior inter-departmental consultation, often at the last minute before meetings
Tariff preferences under the EAEU–Indonesia Agreement (2025): reduction in the average import duty rate from 10.2% to 2% across 90% of the product range	Reactive model for implementing ECE standards: each decision requires a separate broadcast via national regulations, with a delay
Opportunities	Threats
EEC technical assistance mechanisms for member states: formally available; however, the Kyrgyz Republic has not submitted any systematic requests	Risk of tighter secondary sanctions against re-export schemes via the Kyrgyz Republic, and the threat to strategic autonomy, as a key source of budget revenue lies outside Bishkek's sovereign control
Expansion of the EAEU's foreign trade agreements is creating new export markets for Kyrgyz exporters in priority sectors	Kyrgyz Republic's fixed share in the distribution of EAEU customs revenues (1.9%), without any mechanism for review, which does not reflect the country's actual contribution to transit trade, according to International Monetary Fund estimates
Regulatory Impact Assessment tool is incorporated into the union's legal framework and can be applied without the need for further legislative amendments	Re-export model's high dependence on external geopolitical conditions, over which the Kyrgyz Republic has no control, coupled with a lack of contingency planning in the event of changes to those conditions

Source: compiled by the author based on Eurasian Economic Commission (2015), Treaty on the Customs Code of the Eurasian Economic Union (2018), T. Kolnberger & H. Koff (2021), C.A. Hartwell (2021), S. Lim & C. Khun (2022), X. Fernández-I-Marín *et al.* (2023), S. Adhikari & B. Khatri (2023), A.M. Kelishomi & R. Nisticò (2024), National Statistical Committee of the Kyrgyz Republic (2025), Eurasian Economic Union (2025; n.d.), International Monetary Fund (2025)

The SWOT matrix shows a structural paradox that is the main policy finding of this section: the most

important strengths of the Kyrgyz Republic and the most serious threats to its sovereign capacity are part of a single

system of interdependent vulnerabilities. The re-export niche fills the coffers, but their sustainability is entirely dependent on the continuation of a sanctions regime that Bishkek cannot influence. Its geographical position as a transit country is a strength, yet it leaves the country vulnerable to the tightening of secondary sanctions. Formal equal voting rights within the union's bodies constitute a legal resource for sovereign agency, yet remain untapped due to the institutional constraints of the bloc's weaknesses. The state benefits from integration where its sovereign capacity is most limited. The balance between weaknesses and opportunities reveals a fundamentally substantial political pattern: most opportunities do not require external resources or changes to the union's architecture; they are embedded in the existing EAEU treaty framework and are accessible without additional legal amendments. The EEC's technical assistance mechanisms, the Regulatory Impact Assessment tool, and the expansion of foreign trade agreements – all these exist, yet remain untapped due to internal constraints on political capacity, as identified in the section on weaknesses. Therefore, the gap between the existing level of sovereign agency and the level that could potentially be achieved is determined not by the architecture of the union, but by the state's political will and institutional capacity to utilise the instruments already at its disposal.

The strategic priority for the Kyrgyz Republic is not the expansion of formal membership, the search for new formats or waiting for favourable external conditions, but the transformation of the existing opportunities of the alliance into a measurable strengthening of sovereign agency by eliminating institutional constraints. This shift, from being an object to becoming a subject of integration policy, from passively receiving normative impulses to actively shaping the conditions for domestic participation – this is the essence of what is referred to in international relations theory as “smart integration”: not a withdrawal from an asymmetrical union, nor the acceptance of asymmetry as a given, but rather the purposeful strengthening of negotiating capacity, diplomatic initiative and institutional effectiveness within existing frameworks. The analysis of the strategies used by Kyrgyzstan to face the challenges to its sovereign capacity shows the persistence of the reactive model, which is not only a managerial limit but a political feature of the state that has not yet fully developed its internal diplomatic agency in the union. The state reacts to emerging problems after they have occurred, rather than developing a proactive system of monitoring and early warning. Politically this means that the agenda for the participation of the Kyrgyz Republic in integration is set by others and the Kyrgyz Republic simply adapts to decisions that have already been taken. The reactive model is not a matter of strategic choice but of institutional ballast: an amalgam of accumulated constraints on diplomatic infrastructure, negotiating capacity and analytical independence, which perpetuate the state's passive stance regardless of the intentions of particular leaders.

The configuration identified – passive integration in a framework of formally equal membership – is not insuperable. The idea of “smart integration”, developed in relation to small states in asymmetric integration blocs, involves a shift from a reactive to a proactive model of

participation, through three interrelated principles: selectivity, adaptability and proactive agency. These principles are embodied in the form of governance measures in the Kyrgyz Republic, implemented in the existing institutional framework of the EAEU without amending the fundamental treaty obligations. The principle of selectivity means not engaging in all the Union's rule-making processes on equal terms. Clearly, a small state does not have the resources for this, so the emphasis should be on concentrating diplomatic efforts in niche areas where the Kyrgyz Republic has comparative advantages or where the stakes are highest. The Kyrgyz Republic is a transit hub on the Middle Corridor, a country that can set domestic standards in digital security and a proponent of humanitarian corridors as an instrument of compensatory diplomacy – these are three niches where a selective concentration of resources can yield measurable results. The Kyrgyz Republic's transport function, in particular, provides a bargaining chip that is underutilised: a state that controls transit routes have the means to influence the conditions under which they operate, provided there is the political will to apply them.

The principle of adaptability involves establishing institutional mechanisms to monitor changes in the EAEU's regulatory environment and to adapt to them proactively before they become applicable, rather than after. A practical embodiment of this principle is the establishment of an Analytical Centre within the Ministry of Foreign Affairs of the Kyrgyz Republic, specialising in monitoring the EEC's regulatory agenda, assessing the regulatory impact of proposed decisions on Kyrgyz economic actors, and preparing negotiating positions before, rather than after, decisions are taken by supranational bodies. A regulatory impact assessment for every significant EEC decision could be used to formulate a well-reasoned position within the union's bodies, rather than reacting to regulations that have already been implemented. The principle of proactive agency entails the targeted use of all formal channels of influence available to the Kyrgyz Republic, which it does not, however, utilise sufficiently. Statistics on appeals to the EAEU Court for the period 2015–2021 clearly illustrate this limitation. It is necessary to establish a specialised legal unit within the Permanent Mission of the Kyrgyz Republic to the EEC, authorised to systematically utilise dispute resolution mechanisms, parliamentary diplomacy within the framework of the CIS Interparliamentary Assembly to initiate amendments to the mechanisms for the protection of migrant workers; and digital diplomacy as an independent strand of foreign policy.

The combination of the three principles of smart integration makes it possible to manage the constraints on sovereignty without addressing its structural causes – the asymmetries in the size and resources of member states. This involves a reduction in institutional dead weight: the set of obligations, costs and constraints that the Kyrgyz Republic bears as a member of the union, without converting them into commensurate political influence. The “smart integration” is not an alternative to membership of the EAEU – it is a strategy for its qualitative rethinking: a shift from participation as a given to participation as an instrument of political security, whereby the state itself determines the conditions and priorities of its

integration presence. The transition to a “smart integration” model – the conscious management of agency within an asymmetrical union – requires institutional changes in three interrelated areas, each of which has a fundamental political, rather than merely administrative, dimension. Firstly, diplomatic expertise must be institutionalised through the establishment, within the Ministry of Foreign Affairs of the Kyrgyz Republic, of a specialised analytical body bringing together legal, economic and monitoring units. The political importance of such a body goes beyond technical co-ordination: it would be an instrument for shaping a sovereign negotiating position, to ensure that the Kyrgyz Republic is not simply in a position to attend meetings of the EEC, but to influence the decisions taken before they are finalised, thus ensuring continuity of diplomatic expertise when the composition of delegations’ changes. One reason why the potential of the country’s negotiations is exploited to a lesser extent than is formally possible is the absence of such continuity.

Secondly, the introduction of Regulatory Impact Assessment tools enhances legislative sovereignty, not only improves the regulatory environment. A state that takes on obligations without an independent assessment of their consequences has a limitation in the information base for sovereign decision-making: The Jogorku Kenesh ratifies what the Government has agreed without independent expert review, whilst the Government agrees to what the EEC has proposed without meaningful Kyrgyz participation in its formulation (Eurasian Economic Union, n.d.). The priority is political, not technical: to break this chain of information dependency. Thirdly, there is still no fully developed diplomatic agency in the Kyrgyz Republic, as the state institutionally capable of acting in a proactive manner in a multilateral context. This calls for targeted training for diplomats and civil servants who are specialising in EEC procedures, integration law and the practice of protecting national interests within supranational structures. The economic data analysed in the previous sections measure the cost of this absence: re-export revenues the state cannot control, a portion of customs duties it cannot contest, and agreements whose terms it did not contribute to define. None of these figures is an economic indicator, but a political indicator of the constraints on sovereignty.

The EAEU, the CSTO and the SCO’s compensatory role for Kyrgyzstan – providing security, markets and legitimacy that the state cannot provide on its own – is not a permanent given, but a temporary substitute for sovereign capacity. The strategic objective is to progressively substitute real agency for this compensatory dependence: not by exiting these integration frameworks but by developing domestic capacity, which will convert participation in them from a forced hedge to a conscious sovereign choice. Only if this condition is met will the Kyrgyz Republic’s participation in the EAEU be capable of generating not merely short-term dividends from changing circumstances, but sustainable political and economic outcomes that reflect the state’s genuine agency within the regional architecture.

Discussion

The study results confirmed that the Kyrgyz Republic’s participation in the EAEU creates a range of economic

effects, the nature of which is determined not so much by the formal parameters of membership as by the interplay between the structural characteristics of a small economy, the state’s institutional capacity, and the asymmetry of negotiating positions within the union. The analysis showed that the institutional design of the Kyrgyz Republic’s participation is geared more towards fulfilling the commitments it has undertaken than towards actively utilising the potential of membership to diversify the economy and manage risks. The study results are consistent with the conceptual conclusions of R. Dragneva & C.A. Hartwell (2020), who demonstrated that the institutional design of the EAEU may impose constraints on trade liberalisation, as political considerations often take precedence over economic ones in the decision-making process within supranational bodies. The assertion that the union is geopolitical rather than economic in nature appears debatable as regards the Kyrgyz Republic: whilst it may be valid in terms of describing decision-making mechanisms, it does not take sufficient account of the actual market effects experienced by small member states, regardless of the political nature of the union project. The analysis by A. Adarov (2022), who applied a gravity model and the synthetic control method to the analysis of Eurasian economic integration, proved fundamental for assessing the trade effects of membership. The author found that the establishment of the Eurasian Customs Union in 2010 and its subsequent deepening generated significant trade-creating effects; however, these had largely dissipated by 2015. The sectoral structure of the effects proved to be highly concentrated: the main benefits were concentrated in the commodities sectors, whilst the effects in sectors such as textiles, engineering and transport – which were initially positive and statistically significant – had also dissipated by 2015.

A comparative analysis with Armenia calls for caution in interpretation. On the one hand, as shown in this study, the institutional design of the EAEU is formally identical for all small member states. On the other hand, the statistics on cases brought before the EAEU Court for the period 2015–2021, cited above, indicate that Armenia, in contrast to Kyrgyzstan, has been able to utilise the judicial mechanism to protect its national economic interests (albeit to a lesser extent than Russia and Kazakhstan). This empirical fact does not refute the concept of institutional ballast but significantly clarifies it: the presence or absence of ballast is determined not so much by the architecture of the union as by the quality of the national bureaucracy, its specialisation in integration law, and the degree of political autonomy enjoyed by the relevant ministries from interest groups keen to preserve shadow schemes. In other words, differences in the intensity of recourse to judicial mechanisms can be explained not by the architecture of the union, but by the characteristics of the institutional environment: in Kyrgyzstan, re-export rent is institutionalised in the form of entrenched informal practices, which may hinder the development of a demand for professional diplomatic expertise to the extent observed in Armenia. Thus, the comparative case of Armenia confirms that the transition to “smart integration” in the Kyrgyz Republic requires not so much a reform of the EAEU as the overcoming of

internal political and administrative barriers, which Armenia encountered to a lesser extent.

The post-colonial nature of the Kyrgyz Republic's trade links with the member states of the union is revealed by the findings of A. Mazhikeyev & T.H. Edwards (2020), who established that post-Soviet trade links reproduce dependence on a dominant partner even within the framework of a formal integration architecture. The data confirmed the relevance of the logic of post-colonial dependence to the Kyrgyz Republic: the country's export structure within the EAEU is still specialised in raw materials and low-tech sectors, while the potential for diversification into higher-margin sectors remains unfulfilled.

The significance of the risk of protectionism for the economic prospects of the Kyrgyz Republic is illustrated by the arguments of M. Dabrowski (2024), who showed that restrictions on trade openness led to measurable losses in productivity, technological development and allocative efficiency, even in countries with an initially weak institutional framework. This argument should be clarified when considering the Kyrgyz Republic: the country is not so much faced with the risks of direct protectionism, as with the risk of passively maintaining the niche of re-export as the main source of budget revenue, to the detriment of diversification. The difference lies in the fact that M. Dabrowski sees protectionism as a politically motivated phenomenon, while this paper has identified its structural counterpart – the situational concentration of economic benefits in transit intermediation as a consequence of institutional inertia, not a conscious choice. This means that, in the case of the Kyrgyz Republic, a reactive integration strategy based on the exploitation of the re-export niche, but ignoring the modernisation of the manufacturing sector, reproduces a structural vulnerability whereby economic benefits are concentrated in transit intermediation rather than in the creation of added value, making them vulnerable to changes in the geopolitical landscape.

The revealed asymmetry of economic effects in favour of sectors where the state is passive is consistent with the findings of E. Davtyan (2023), who, using data from Armenia, showed that small states can achieve disproportionately strong influence within the EAEU through the strategic use of formal mechanisms and judicial appeals against EEC decisions. This is consistent with the argument put forward by M. Nasibov & A. Gawrich (2025), who empirically established that secondary EAEU states, including those that initially followed Russian positions, have consistently demonstrated significant agency within regional organisations throughout the history of post-Soviet regionalism. Whilst this conclusion by the authors is convincing in terms of the general logic of post-Soviet regionalism, it fails to distinguish between instances where agency was exercised in response to specific crises and instances of its systematic, proactive manifestation.

The fiscal dimension of integration effects is provided with a conceptual framework by the arguments of D.R. Agrawal *et al.* (2024), who systematised contemporary models of fiscal federalism and demonstrated that persistent asymmetries in the distribution of revenue amongst members of integration blocs occur where mechanisms for revising fixed shares are institutionally underdeveloped. This conclusion is broadly consistent with the findings of

the presented study, but requires clarification in light of the specific nature of a supranational customs union: the authors consider fiscal federalism primarily in relation to vertical relations between the central government and sub-national units, whereas in the case of the EAEU, the issue concerns horizontal asymmetry between formally equal member states. This stability is also explained by the arguments put forward by T. Saber *et al.* (2022), who established that, from an evolutionary perspective, the optimal composition of a customs union is not stationary and requires mechanisms for the adaptive revision of membership conditions. This thesis put forward by the authors appears debatable insofar as it assumes evolutionary rationality to be the force of institutional change: the actual practice of the EAEU demonstrates that the consensus-based nature of decision-making within the union structurally limits the scope for revising the terms of participation.

The institutional constraints on public administration that affect the realisation of integration potential are theoretically underpinned by the findings of O.F. Baris *et al.* (2021), who established that, in post-Soviet Eurasia, public administration supports economic growth without, however, evolving into an institutional separation of powers and civic oversight. This thesis put forward by the authors is broadly consistent with the findings of the present study; however, its application to the context of integration requires clarification: O.F. Baris *et al.* view the governance deficit as a characteristic of relations between the state and civil society, whereas the present study identified its manifestation in a fundamentally different sphere – in relations between the state and supranational institutions. This conclusion is complemented by the arguments of C. Knox & D. Sharipova (2023), who systematised public sector reforms in developing countries and demonstrated that the post-neo-managerial era is characterised by hybrid and layered reforms, in which new instruments are superimposed upon the Soviet administrative legacy without substantively eliminating it.

The identified link between the Kyrgyz Republic's re-export niche and the growth of the shadow economy is provided with a conceptual framework by the study by K. Gërxhani & S. Cichocki (2023), who demonstrated that the shadow economy in transition economies is not an anomaly but an institutionally entrenched adaptation to the imperfections of formal regulations. As applied to the Kyrgyz Republic, this means that unregistered re-export operates not as a temporary strategy, but as a stable structural element of the economy, perpetuating the gap between formal macroeconomic indicators and the actual manageability of trade processes. A.M. Kelishomi & R. Nisticò (2024) demonstrated that sanctions pressure on a large economy leads to a reallocation of labour from the formal to the informal sector in intermediary economies: sanctions increased the likelihood of informal employment for workers in sectors with a high dependence on imported resources. This conclusion is relevant and generally consistent with the findings of the present study; however, it is based on data from a country targeted by sanctions, whereas the Kyrgyz Republic holds a fundamentally different position within the sanction's architecture – that of a transit intermediary, rather than a direct target of restrictive measures.

The migration dimension of integration effects requires a conceptual re-evaluation in the context of the arguments of A.V. Gevorkyan & J. Assa (2021), who identified a welfare crisis in small post-socialist economies as a structural characteristic that persists regardless of the dynamics of macroeconomic indicators. This conclusion is relevant, but it is based on aggregated data across the entire post-socialist region and does not distinguish between states with varying degrees of integration. The presented study complements this argument by demonstrating that aggregated macroeconomic indicators create a statistical illusion of macroeconomic stability, whilst masking a structural deficit in domestic sources of growth and the growing dependence of households on decisions taken outside the country. The conceptualisation of labour migration as a systemically unmanageable risk takes on an additional dimension through the findings of T. Kolnberger & H. Koff (2021), who demonstrated that small states are forced to adopt seemingly paradoxical strategies: simultaneously reaping the benefits of participation in supranational structures whilst complying with their regulatory constraints. S. Adhikari & B. Khatri (2023), comparing the Philippines and Nepal, confirmed that countries heavily reliant on remittances consistently fail to diversify their sources of growth, perpetuating institutional shortcomings in labour migration management policies as short-term revenues reduce political pressure for structural reforms.

Overall, the discussion has shown that the findings of this study are generally consistent with the current academic literature on post-Soviet integration, risk management and institutional reforms, whilst significantly refining it in relation to the specific circumstances of a small state with multiple integration memberships. The conclusions confirmed that the economic effects of membership of the EAEU are determined not by formal parameters of participation, but by the interaction between market mechanisms, the state's institutional capacity and the geopolitical context.

Conclusions

The findings of the study indicate that the Kyrgyz Republic's participation in the EAEU is forming a stable configuration of asymmetric agency: whilst formally an equal member of the union, Kyrgyzstan in practice follows a predominantly reactive model of participation, which limits its ability to influence regulatory decisions in domestic interests. The institutional design of the Kyrgyz Republic's participation is characterised by a disconnect between the formal comprehensiveness of the regulatory framework and the state's operational capacity to realise the potential for integration. The core coordination law was drafted prior to accession to the union and does not contain any mechanism for interaction with supranational bodies. The Jogorku Kenesh, which is constitutionally empowered to oversee the implementation of international treaties, is not currently engaged as an instrument for substantive oversight of the implementation of EAEU regulations. Strategic documents, for their part, declare integration priorities without providing operational criteria for their verification.

The study established that the economic benefits of membership are distributed unevenly, and that this

unevenness is determined not by the architecture of the union, but by the nature of a state's sovereign capacity. The typology of threats developed across four dimensions suggests that the reactive model of governance is not the result of a random deficit of competences, but rather a manifestation of institutional baggage – accumulated constraints within the diplomatic infrastructure and negotiating capacity – which systematically reproduce the country's passive position within the union. Simultaneous membership of the EAEU, the CSTO and the SCO reflects not so much a multi-vector foreign policy as a necessary hedging of sovereignty through the compensatory functions of these organisations. Kyrgyzstan's key task is to replace this hedging with a model of “smart integration”, which will transform dependence on external guarantees into genuine agency. Consequently, the priority is not to abandon military-political and economic alliances, but to build internal capacity that will transform participation in them from a necessity into a conscious, sovereign choice.

To implement this transition in practice, a package of priority institutional measures is proposed; these do not require any revision of the EAEU's founding treaties and are to be funded from the current budgets of the relevant ministries. In the short term, it would be advisable to establish an inter-ministerial working group within the Ministry of Foreign Affairs to monitor EEC decisions, to initiate, through official EEC channels, a review of the formula for the distribution of customs revenues, accompanied by calculations of the Kyrgyz Republic's actual transit contribution, and to approve regulations for inter-ministerial coordination of positions, with a mandatory deadline of at least ten working days prior to meetings of the Union's bodies. In the medium term – establish an Analytical Centre for Integration Policy within the Ministry of Foreign Affairs (staff of 5-7 people: an international lawyer, a foreign trade economist, a regulatory impact assessment specialist, and a migration analyst), introduce a mandatory regulatory impact assessment procedure for all draft EEC decisions that affect Kyrgyzstan's interests, and to form a legal team at the Permanent Mission of the Kyrgyz Republic to the EEC for the systematic use of the mechanisms of the EAEU Court (target: at least two appeals per year to protect national economic interests). In the long term, the inclusion of a module on integration law and negotiation strategies in professional development programmes for diplomats and civil servants is a necessity, as is supplementing the Foreign Policy Concept with operational indicators of the effectiveness of participation in the EAEU (the proportion of initiatives put forward by the Kyrgyz Republic; the number of judicial mechanisms used; trends in exporter satisfaction) and establishing a standing Committee on Integration Cooperation under the Jogorku Kenesh, with the right to carry out independent expert reviews of EEC draft decisions before they are ratified. The implementation of this package will ensure the systematic replacement of institutional dead weight with real agency, and the transition of EAEU membership from a forced hedge to a conscious sovereign choice.

A limitation of this study is its dependency on official documents and aggregated macroeconomic indicators that primarily express a formalised institutional viewpoint and do not comprehensively cover informal practices in

the customs administration and the shadow trade sector. A promising approach for further research would be to apply the difference-in-differences method based on time series of economic indicators for periods before and after key integration events, as well as to conduct a comparative analysis of the institutional models of participation of small EAEU states with a view to identifying replicable practices for enhancing negotiating capacity.

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Conflict of Interest

None.

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