

**Who Decides Counterterrorism Measures In Central Asia? The  
cases of Kazakhstan and Kyrgyzstan**

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Submitted to  
Central European University  
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In partial fulfillment of the requirements for the degree of Masters of Arts

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Vienna, Austria  
2023

## **Author's declaration**

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## Abstract

This paper examines the counterterrorism policies of Kazakhstan and Kyrgyzstan. It explores the influence of Russia, China, the United States of America (USA) as well as international organizations such as the United Nations (UN), the Organization for Security and Cooperation in Europe (OSCE), Shanghai Cooperation (SCO) and Commonwealth of Independent States (CIS). Drawing on policy documents, government states, and secondary literature, the study reveals that the counterterrorism policies of Kazakhstan and Kyrgyzstan are the product of referring to third parties as their reference group in accordance with the reference group perspective theory. To investigate this, Dongen's model was used. The model classified the counterterrorism policies of China, Russia, and the USA and linked them with the resemblance of the measures of Kazakhstan and Kyrgyzstan's models. As a result, it shows that Kyrgyzstan has a higher tendency to cooperate with the West, especially with the UN and the OSCE, whereas Kazakhstan displays a balanced approach and draws influences from a variety of players. This is explained by a combination of historical, cultural, and geopolitical elements, as well as Kyrgyzstan's dedication to democratic principles and a quest for aid in resolving security issues in the area. The paper emphasizes the role of international organizations in providing member nations with technical help, training, and support while highlighting the significance of regional dynamics in determining counterterrorism policy.

**Key Words:** Kazakhstan, Kyrgyzstan, counterterrorism, Dongen model, international organizations, China, Russia, the USA, terrorism, national strategy.

## **Acknowledgments**

I would like to thank my academic supervisor, Dr. Matthijs Bogaards, for guiding me and offering valuable feedback during the process of thesis writing. I draw a lot of information in methodology and analysis parts from the final paper for the class my supervisor offered, Terrorism: A Comparative Politics Perspective. Also, this thesis would have not been possible without the support of my family. In particular, I would like to express my sincere gratitude to my sister, Fariza, who financed my master's degree. Last but not the least, two people in my life – my roommate and my partner – made this journey so much smoother and pleasant.

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## **List of Abbreviations**

EU	European Union
CIS	Commonwealth of Independent States
CSTO	Collective Security Treaty Organization
CT	Counterterrorism
JPoA	Joint Plan of Action
OSCE	Organization for Security and Co-operation in Europe
SCO	Shanghai Cooperation Organisation
UN	United Nations
USA	United States of America
UNODC	United Nations Office on Drugs and Crime

# 1 Introduction

Countries tend to adopt different policies to combat the threat of terrorism depending on its urgency and scope. The states in Central Asia (Kazakhstan, Kyrgyzstan, Uzbekistan, and Turkmenistan), actively fight terrorism despite the low number of terrorist attacks (Omeliicheva, 2007a; Reyes and Dinar, 2015; Sharipova and Beissembayev, 2021). For example, Kazakhstan spent about 695 million US dollars between 2018 and 2022 (Sultan, 2022). Yet, they are not the only states that allocate huge amounts of money to counterterrorism policies. Almost all states are concerned with either domestic or foreign terrorism threats, and thus, invest in developing a proper strategy to combat terrorism. The research on counterterrorism in the larger field of terrorism studies has increased as cities such as London, Paris, and New York experienced attacks. This facilitated the interest among scholars and led to numerous papers on individual countries' policies. It would seem that this field in academia involving a wide range of people's engagement including government officials would be well-researched (Lain, 2016), but it is not the case given that there is no final consensus on the definition of terrorism yet (Schmid, 2004).

The core issue within the literature on terrorism studies is to define *terrorism*. States define terrorism differently, and some alter the scope of the definition to fit their political agenda. For example, according to the government of Kazakhstan, terrorism is any act of violence that violates public safety, intimidates the population, and/or puts pressure on the decision-making process of the government (Reshetnyak and Omaliicheva, 2022). This is a quite standard definition of terrorism, yet some extend it to a broader and more vague scope. The Russian government adopted several pieces of legislation in 2021 that declare organizations and civil societies as terrorist groups and “undesirable” for society's peace (U.S. Department of State, 2021). Having presented this variation, for the purpose of this paper, the terrorism definition is solely based on academic papers.



This search for academic consensus on the definition of terrorism is ongoing, and it shows why scholars have difficulties capturing this phenomenon. The confusion and overlapping of the terms terrorism and terror complicate the theory formation (Schmid, 2004). Schmid (2011) explains that terror is the trigger of overwhelming acute fear, which is not necessarily unique to acts of terrorism. Moreover, terrorism might be confused with various types of political violence, and most importantly, definitions may vary depending on who gets to declare an act as terrorism, which is a multi-layered issue given that the act usually has several audiences, targets, and parties involved (Schmid, 2011). That is why, Aran offers necessary elements for the definition of terrorism which includes violence being predetermined, and intended; targeting civilians with the main intention of causing of fear. Schmid (2011, p.86) proposes the following definition which this paper builds around the arguments for counterterrorism:

A tactic of fear-generating, coercive political violence, and calculative, demonstrative, direct violent action without legal or moral restraints targeting civilians and non-combatants, performed for its propagandistic and psychological effects on various audiences and conflict parties.

This definition of terrorism is useful; it covers the scope of all the states and international organizations' policies for countering these actions.

Counterterrorism is a policy consisting of a combination of foreign and domestic measures that limit the activity of terrorists to defend the public from fear, violence, and threat (Omelycheva, 2007b). Generally, it includes a wide range of actions that directly target terrorists (freezes the financial capabilities of terrorists, assassinations of their leaders, prohibits physical travels) to broader measures (tackling the economic and political grievances of people, preparing first responders) (Schmid, 2020; Omelycheva, 2007b). The literature on counterterrorism classifies these measures based on the extent of the force they require, distinguishing between soft-liners and hard-liners (Pedazhur and Ranstorp, 2001; Crenshaw, 2001; Crelinsten, 2002; Ranstorp, 2007; Omelycheva, 2007b; Silke, 2020; Schmid, 2020).

Other, less common categorizations entail dividing the policies into criminal justice, war, and communication models. These typologies are quite useful in analyzing individual states' counterterrorism policies and making a comparison as unpacking this complex and multi-dimensional field is challenging. That is why, Schmid (2020) provides a toolkit to examine counterterrorism policies. For example, it includes military and legal aspects, intelligence and police system, and many more. Despite the existence of frameworks and classifications of counterterrorism, they are mainly developed for the analysis of state policy that is considered democratic. Therefore, studying this field with the examples of Central Asian states, in particular, Kazakhstan and Kyrgyzstan is worth the scholarly interest.

Firstly, investigating this topic would contribute to the field of terrorism studies and counterterrorism. Although there are accomplished scholars who specialize in terrorism in Central Asia, there has not been a study that brings together different models of counterterrorism and international organizations to examine their influence on Kazakhstan and Kyrgyzstan.

Secondly, it is interesting to observe whether the traditional explanations of counterterrorism policy by prominent scholars such as Crenshaw, Schmid, and others, who base their analysis on democratic and Western states, is applicable to the context of Central Asia. For instance, the theoretical framework they use emphasizes the perception of the threat as an important variable to explain the variation and formation of counterterrorism policies. While this is a relevant factor to Kazakhstan and Kyrgyzstan that securitizes the terrorism narrative, it would be interesting to explore whether their differences in democracy score play any role in it. Additionally, many scholars claim that there is a process of convergence occurring in the counterterrorism policies of these countries (Omeliicheva, 2007a, 2009a; McAllister and Kheronsky, 2007; Martini, 2002), and that is why it is important to test this claim's relevancy now and with the different frameworks as well as to identify its possible factors.

Overall, this thesis argues that international influence (international organizations as well as the powerful states Russia, China, and the USA) shape the approach to counterterrorism policies adopted by Kazakhstan and Kyrgyzstan more than the national security priorities. This paired case selection study employs the methodology used by Dongen. First, the research paper goes into the literature that covers how counterterrorism policies are formed and different models of the policy. Then, it offers the justification for the methodology which includes the utility for choosing Kazakhstan and Kyrgyzstan cases. This is followed by a detailed analysis of Kazakhstan and Kyrgyzstan's counterterrorism policies. This also covers the explanation of Russian, Chinese, and American counterterrorism policies along with international organizations' (Commonwealth of Independent States, Organization of Security and Cooperation in Europe, Organization of Shanghai Cooperation, and the United Nations) approach. Finally, the paper concludes by identifying reasons for the resemblance and trends in approaches of both countries to counterterrorism and highlighting the limitations.

## 2 Literature Review

### 2.1 Theoretical Framework

The state of the literature on the explanation of counterterrorism policies is very limited. There are few scholarly studies that cover cross-sectional or time-series analysis. Those that have such empirical analysis are often based on liberal democracies (Omelycheva, 2007b). All the essential books dedicated to counter-terrorism measures - The Routledge Handbook of Terrorism and Counterterrorism (Silke, 2020), The Counter-Terrorism Puzzle: A Guide for Decision Makers (Kaplan, 2018), Countering Terrorism and Democracy and Counterterrorism: Lessons from the Past (Schmid et al., 2021) provide a very detailed overview of terrorism and the effective strategies to combat, yet the authors do not address the variations in the implication of these policies in less researched regions such as Central Asia. For example, in a recent glimpse at the state of counter-terrorism studies, Schmid et al. (2021) highlighted that it is significantly behind terrorism studies in terms of conceptualization and operationalization to measure the effectiveness of policies. In addition, scholars often mention that counterterrorism studies' greatest weaknesses are research methodologies and lack of primary sources. Hence, the literature on counterterrorism is relatively sparse.

This section focuses on one of the main elements of counterterrorism studies - the formation of policies. Mainly, in the field, scholars focus on the effectiveness of counterterrorism policies, and on the reasons people become radicalized, which overlooks the reasons behind a certain policy. This limited literature on the explanation of counterterrorism policies is divided into two groups - Rationalist and Constructivist approaches (Omelycheva, 2010). Rationalists explain a particular policy choice based on goal-seeking behavior. According to it, a government implements a policy if the cost of approving it is not higher than the benefit it creates. In this way, the cost of indifference to terrorist attacks is too high for governments to ignore, and hence, they adopt policies accordingly (Fearon and Wendt, 2002).

This explains how the origins of strategies, the intensity and threat of terrorist attacks, and the government's ability to control them are factors that determine their direction.

For the constructivist approach, the logic of appropriateness is a main factor shaping policies. Governments act according to their socially constructed identities which are formed as a result of ideas, knowledge, and culture (Finnemore and Sikkink, 1998). Therefore, approaching an issue as a threat could not be evaluated independently of states' identities. Instead, for constructivists, social norms and ideas about an appropriate legitimate way to counter terrorist actions are what determine the policies (Adler, 2002).

However, what both theories overlook is that the explanations they provide do not offer a full picture of governments' decisions on counterterrorism policies. That is why, Omelicheva (2010) proposed to apply constructivism and rationalism together to understand Central Asian countries' response to terrorism. For example, she uses this framework to "guide her through the analysis" because rationalism dictates that the emergency of the threat influences the extent of the state's response, while constructivism argues that the path Central Asian countries choose to pursue is a reflection of social norms. In other words, Omelicheva (2010) believes that the resources of individual states determine their policy along with the fatality of terrorist attacks. In the case of constructivism, the Central Asian governments are taught to believe due to historical ideas that terrorism comes from radical Islam (Blank, 2012). Hence, the policy that targets followers of non-traditional Islam is present. Additionally, constructivism's pillar that states are social actors who act according to norms (international norms that need to be followed) is useful in the explanation of why Central Asian states decide to cooperate with international organizations. Overall, both theories provide the logic behind the counterterrorism policies of Kazakhstan and Kyrgyzstan which emphasize the ideas of the government about what the threat is, how urgent it is, and the accessibility of resources.

While constructivism and realism offer an explanation of Central Asian' governments policies, they have a shortcoming in examining the slight differences among these countries. That is why, another theory - securitization - is also implemented in the literature to analyze a state's response to terrorism. This theory is established in "The Copenhagen School" of security which is more widely used in security studies. This framework examines the counterterrorism policy as a process in which the threat is acknowledged and labeled (Baker-Beall and Mott, 2022). This political discourse that evaluates certain threats as terrorist acts is analyzed. For example, by referring to terrorism as an existential threat, Central Asian governments promote the urgency of this presupposed existential problem and facilitate the audience's acceptance of such discourse. Similarly, the European Union's definition of terrorism is shaped in a way to present the threat to the "values of our democratic societies and freedom" - which, according to Baker-Beall and Mott (2022), facilitates the idea that openness of the EU is an important factor to take into account in designing counterterrorism policies. They argue that securitization explains the policy made after the 9/11 events in the EU. Because the people in charge linked the threat with migration and they perpetuated this narrative further in public speeches, counterterrorism policies were made to target immigration and asylum seekers. That is why, the policy documents display a language that claims to increase security at border controls, implement the highest degree of alertness in issuing visa documents, and is directed at strengthening the intelligence gathering procedures (Baker-Beall and Mott, 2022). As a result, given that constructivism and realism examine the role of ideas and the available resources in the formation of counterterrorism policies, securitization focuses on the impact of the discourse around the threat. This is closely related to constructivism as both theories treat socially constructed narratives as the main factors in choosing the policies.

Besides these widely used theories in the terrorism field, there is another alternative explanation - the reference group perspective (Omelicheva, 2009b). This theory examines the

influence of reference groups on counterterrorism policy. A reference group refers to a group whose principles and ideas a person/government resembles. This concept was first introduced in social psychology, but it could also be implemented in international politics. Many scholars highlighted that governments base their decision on external factors - international models - for policy choices (Omelicheva, 2009b). There are two possible explanations for this state behavior. One assumes that by relying on international models, a state has a better chance of dealing with an issue because the model offers various countries' experiences and improvements. Additionally, it can serve as a foundation to cooperate with that reference group more. This allows to secure more resources such as money, weapons, and experts in countering terrorism. In other words, this reference group is a group of political elites that set standards and policies for a broader audience because they have legitimacy (Omelicheva, 2009b). Applying this theory to counterterrorism literature shows that the policies of some states are used as a model to be enforced for others. It can be both an organization that has a separate department for the counterterrorism policy that informs others about the effectiveness of such measures, as well as a powerful state.

For example, Estonia's counterterrorism policy could be analyzed through this framework of reference group. According to Omelicheva (2009b), Estonia has not for the most part experienced any terrorist attacks in the last few years besides high threat levels in the first years of its independence. Having numerous Soviet troops in its territory, Estonia looked for security guarantees from the European Union and the North-Atlantic Security Organization. As membership in these organizations could offer possible economic rewards along with security, the government decided to resemble EU and NATO's policies as effective models. Therefore, they are Estonia's reference group from which the state seeks approval. Omelicheva claims that Estonia was not concerned with the threat of terrorism until NATO and the EU pushed its agenda. Moreover, it is believed that some counterterrorism policies in the categories of

intelligence and preparedness are costly for the government to execute, but Estonia still carries out these programs as it is made to consider terrorism as an urgent threat due to its reference groups (2009b).

Overall, the literature offers various theories (Constructivism, Realism, Securitization, and Reference Groups Perspective) to explain states' choices on counterterrorism policies. While the traditional approaches are valid in implementing to Central Asian governments, a reference groups perspective is the most suitable for this paper as it could explain the effect of external powers. Given that other theories focus on internal institutions and rational choice, government, and citizen dynamics, in countries (Kazakhstan and Kyrgyzstan) that score low on the democracy scale, they are less applicable. Therefore, it is best to implement the reference groups perspective, which combines both constructivist and realist assumptions, in this paper.

## **2.2 Models of CT**

This section in the literature review is dedicated to introducing various models of counterterrorism policies. Counterterrorism policies are divided into two well-established classifications - hard liners and soft liners. These policies are identical to policies - war/military model and criminal justice models respectively (Blazakis, 2022). Generally, hard liners' policy focuses on the use of force to crush terrorists and their affiliations while soft liners emphasize on a more diplomatic approach (Martini, 2020). Likewise, Crelinsten (2002) and Schmid (2020) being the most prominent scholars in the field offer a typology containing three different policy approaches. Two are as mentioned above (war and criminal justice models) that are aligned with soft and hard-liners, and reconciliatory models. It considers terrorism as a problem in society that occurs as a result of some groups of people who do not have a voice in political reforms. Although most of the classification of counterterrorism models reflects these approaches to some extent, some have additional layers presented for the typology (Lindahl,



2017). For example, Jackson et al. (2011) describes four directions of the policy: two of which are similar to war and criminal justice models - the use of force and policing models; one closely connected with the reconciliatory model - conciliation; and homeland security. The latter defines terrorism as a crisis to local security that requires the state's comprehensive response. Likewise, Sederberg (2003) concludes that there are four categories in the state's approach to terrorism. Sederberg's proposition is quite similar to Crelinstan and Schmid, Jackson et al.'s typology in terms of the role of the hard use of force, and intelligence to prosecute terrorists and the importance of dialogue which addressed the underlying reasons for extremism and terrorism. However, he adds a new dimension to it by proposing the remediation model that is supposed to perceive terrorist attacks as imminent, and hence, prepare for the recovery after the accident.

Some refer to the military model or hard-liners, the war model is a counterterrorism model which treats terrorism as an act of war (Omelycheva, 2007b; Lindahl, 2017). Therefore, it advocates for using brutal force and defeating terrorist groups. The USA's policy after 9/11 is an example of that approach. This increases the state's image in the international arena as it shows that the state is ready to take tough actions to protect its citizens. Hence, the cost of carrying out terrorist attacks requires building an effective deterrence strategy. It also boosts national morale, by creating an environment that avoids destabilizing and freezing citizens from the fear of terror. Moreover, it might be a good response for politicians seeking to pursue reelection as it offers a quick answer for the media and terrified citizens. This ability to strike terrorist activities increases the politicians' popularity. Yet, it is important to consider that even though this strategy is a quickly determined policy, it works only for terrorists that are foreign-based and centralized (Lindahl, 2017).

The criminal justice model perceives terrorism as a crime, not an act of war. This way criminalization of terrorist attacks leads to the treatment of a terrorist as a criminal instead of

an ideologically or politically motivated person (Omelycheva, 2007b). For example, many refer to the Norwegian approach to counterterrorism as a proper criminal justice model. The Breivik attacks in 2011 did not cause any new legislation to treat the perpetrator as a terrorist. Instead, he was given a prison sentence of 21 years and was placed with ordinary criminals. The case illustrates that such a model involves only the police and criminal justice system because, in the Breivik attacks, the main executive power was given to the police, which dealt with everything relating to the case's resolution (Lindahl, 2011). Therefore, this model classifies counterterrorism policies not as a separate field but as a subfield of criminology and criminal deviance literature.

Besides the mentioned models above, there are less-traditional classifications available in the literature. For example, Pedahzur and Ranstorp (2001) proposed a tertiary model of counterterrorism, which is primarily applied by Israel. They refer to this model as an extension of the criminal justice model and do not regard a terrorist act as a criminal offense or an act of war. Pedahzur and Ranstorp (2001) argue that this model includes the delegation of the duty for countering terrorism to the police and secret services for special units. Therefore, this requires separate constitutional legislation that treats terrorist attacks as special cases with the application of different laws.

Other models include the epidemiological approach along with the natural disaster model. The epidemiological approach has three steps and treats terrorism as a disease, so the main point is to control it, offer protection, and increase the resilience of the population. This model, proposed by Stares and Yacoubin (2005), targets marginalized communities vulnerable to extreme ideologies meanwhile Critical Terrorism Studies (Natural Disaster Model) suggest that the policy should focus on preparing people to be first responders (Lindahl, 2017; Martini, 2020). For example, the Handbook on Terrorism Preparedness and Prevention (Schmid, 2020) stresses the importance of policies that target refugee camps, prisons, and the Internet because

these places are considered to have the highest level of radicalization. In addition, it focuses on the prevention of mass panic in case of terrorist attacks. In fact, the model covers measures concerning the containment of citizens' angry actions in retaliation for terrorism.

Crelinsten proposes a model of communication that perceives terrorist acts as a communication phenomenon (2002). According to the author, the act's main goal is to internationally communicate a message to a specific audience through violent means. Because messaging is what plays a key role in radicalization, propaganda, and recruitment, implementing a communication model for counterterrorism is essential. This model focuses on upholding democratic principles in society so that marginalized communities have better chances of communicating their grievances. Crelinsten believes that limiting civil liberties would harm human security as it restricts communication at different levels of society, which makes the other means of communication more appealing, thus, resulting in the emergence of terrorism (2002).

Lastly, it is important to acknowledge that all of the models of counterterrorism policies overlap. They, starting from a very conventional war model to a communication model, target different dimensions of terrorism. Hence, depending on the available resources and inner politics, states choose appropriate ways to contain the threat.

## 3 Research Design

### 3.1 Case Selection

Central Asia is a diverse region containing states (Kazakhstan, Uzbekistan, Kyrgyzstan, Turkmenistan, and Tajikistan) that recently gained their independence in 1991. All the countries received significant attention in the international arena as they possess big territories rich in oil and gas as well as bordering China and Russia. Along with that, the US is also interested in the region as it has huge oil and natural gas resources, as Omelichieva (2007a) highlights. According to her, the USA seeks to promote stability and independence of the region as they want them to have closer ties with the Western world for energy supplies. While China wants to protect its economic interests in the region, Russia does not want to lose its geopolitical influence. Therefore, it is not surprising that Central Asia is an important strategic region for a lot of international actors. In particular, the two countries Kazakhstan and Kyrgyzstan seem to experience the lowest number of terrorism cases, but they still have a comprehensive counterterrorism policy (Omelicheva, 2010; Reyes and Dinar, 2015). Hence, examining the influences of international actors on the counterterrorism of Central Asian states - Kazakhstan and Kyrgyzstan - is needed to understand the puzzling case of the existing numerous counterterrorism policies in the presence of very few terrorist attacks.

The paper uses a method of paired comparison to investigate the international influence (China, Russia, and the USA along with CIS, OSCE, the UN, and SCO) on Kazakhstan and Kyrgyzstan's counterterrorism policies. Given that the two countries are geographically close, have a shared history, and have similar security issues, it is surprising that they have notable differences as well in political structure, foreign policy orientations, and democracy levels. Generally, Kyrgyzstan is considered a more democratic country compared to Kazakhstan. For example, it scores higher in democracy percentage in Freedom House (Lain, 2016).

As Tarrow (2010) highlights, this method offers a proper strategy to study social and political phenomena because it allows one to understand mechanisms more detailedly with considerations of similarities and differences. Similarly, Gisselquist (2014) argues that paired comparisons which include a variation in case selections develop deep analysis. This analysis in paired comparison of Kazakhstan and Kyrgyzstan will illustrate the inclination of each government toward a specific foreign actor.

The selection of paired comparison can display that a more authoritarian regime in Kazakhstan predisposes its counterterrorism policies to resemble China and Russia's interests while Kyrgyzstan, having a more pluralistic system and higher civil society, is orientated more on international organizations such as the UN and OSCE on counterterrorism policies.

### **3.2 Research Method of Analysis**

This section of the paper is dedicated to understanding Dongen's classification of counterterrorism measures and its methodology because it is a suitable approach given that this paper seeks to answer the question "Who decides counterterrorism policies of Kazakhstan and Kyrgyzstan?". Hence, using the classification that Dongen offers, this paper aims to test the extent Kazakhstan and Kyrgyzstan are similar to the counterterrorism policies of one of the foreign actors. Dongen (2010), using the data on nine countries - the Netherlands, France, Germany, Italy, Denmark, Sweden, Portugal, and the Czech Republic - , lists multilayered approaches - strands, categories, and specific measures. The following strands prevent, protect, pursue, and respond are derived from the European Union's official strategy of counterterrorism (Dongen, 2010). The strands consist of particular categories such as government-community dialogue, terrorist financing, and others which could be referenced in the Appendix (Dongen, 2010). The categories are partially based on the United Nations Office on Drugs and Crime's

(UNODC) counterterrorism policies. In this way, Dongen (2010) by relying on UNODC and EU along with academic papers resulted in the categorization of various approaches.

The way counterterrorism policies are distributed among these categories is based on the aim of a policy. For example, France and Portugal seem to incline toward the confrontational approach as their counterterrorism measures mainly account for the categorization of “*pursue*” . This is concluded by calculating the score in the radarchart. The score is determined according to the rule of one point for any amendment of law or regulation while two points for “more tangible” (Dongen, 2010, p.233) continuous activity. Besides the confrontational approach of France and Portugal, there are maximalist and human-agent approaches. The former indicates a country that scores a high number in all four categories, and the latter shows the country that has a high score on prevent and pursue (Dongen, 2010). In this way, Dongen builds a framework that has scientific validity and policy relevance to examine various countries’ counterterrorism policies.

### **3.3. Data Sources and Collection**

To test this paper’s aim, secondary and primary sources will be used. Primary data includes a wide range of peer-reviewed articles, governmental decrees, and international organizations’ documentation while secondary data covers academic books and scholarly articles. International Organizations have archives on their websites which will be utilized heavily.

### **3.4. Hypotheses**

Hypothesis 1a: Kazakhstan’s counterterrorism policy is influenced more by Russia’s interests than international organizations' policies.

Hypothesis 1b: Kazakhstan’s counterterrorism policy is influenced more by China’s interests than international organizations’ policies.

Hypotheses 1 (a and b) deals with the assumption that Kazakhstan's is in tighter cooperation with China and Russia rather than other actors such as the USA, the UN and the OSCE. This is because having China and Russia as neighbors makes the government vulnerable to the outside pressure. Considering that Russia uses the CIS and Collective Security Treaty Organization (CSTO) to increase its influence over the Central Asian states, it is not surprising that literature shows the policy diffusion between Kazakhstan and Russia in many aspects besides the counterterrorism policies (Baev, 2004, 2006). In case of China, SCO is actively exploited to advance Chinese interests (Chung, 2004). Considering that China takes the lead in SCO and has many bilateral trade cooperations with Kazakhstan as well as sharing the security concerns near the border in Turkestan region with Kazakhstan (Chung, 2004), it facilitates the incentives to cooperate in counterterrorism measures.

Hypothesis 2: Kyrgyzstan's counterterrorism policy aligns more strongly with international organizations' suggestions than with Russia, China, or the USA's policies.

While it is true that Kyrgyzstan is also under the impact of China and Russia as Kazakhstan is, Kyrgyzstan's presence in international organizations are greater. Given the proximity of OSCE's Office in Bishkek along with its Academy, the government of Kyrgyzstan relies on them more. Similarly, the UN is more active in assistance of the government in policy-making because Kyrgyzstan's commitment to democratization. The state has a higher level of progress in democratization compared to other Central Asian countries, and thus, it attracts more international organizations promoting democratic values. As for the USA, Kyrgyzstan is careful in adopting their measures because it does not want to appear hindering Russia or China's interests.

## 4 Empirical Analysis

### 4.1 The CT Policies of actors

#### 4.1.1. *Russia*

Russia's fight against terrorism goes back to late 1998 with the legislation on combating it. In 2006, this legislation was replaced by a new one that contains a more detailed definition of terrorism, allows military operations to combat it, and is intended to be in force until 2025. Although there have been a lot of amendments to this legislation in the last few years, the core foundation is still the same. The report of the US Department of State claims that Russia 2021 actively diverged attention to the fight against domestic terrorism. These slight changes in the legislation permitted the oppression of political opposition by using the excuse of "extremism". Besides that, the Russian government is focused on conducting regular exercises for terrorist threats. It is believed that 327 counterterrorism trainings were carried out in 2021, which allegedly prevented 926 people from infiltrating the territory of Russia (US Department of State, 2021). The government emphasizes that counterterrorism takes three directions: prevention, fighting, and minimization of consequences, which is summarized in Table 1 (Концепция о противодействии терроризму, 2021). Therefore, based on Dongen's classification, Russia emphasizes the Pursue category similar to China. Yet, it also has specific measures targeting the Respond category, which is why Russia's counterterrorism policy is a confrontational approach with a focus on the military.

#### 4.1.2. *China*

China's counterterrorism policy distinguishes between terrorism, extremism, and separatism. This government's approach has always been quite radical starting from "Strike Hard" campaigns to ethnic repressions because the leaders of the communist party believe that the prevention of terrorism is based on social stability and ethnic unity (Wang and Kong, 2019).



The last counterterrorism campaign that was approved in 2018 displays significant measures: increasing the numbers of ideologic reeducation centers along with collective prosecution of minorities. For example, in the early years of the campaign, the detentions and forceful placement of Uygurs lasted a maximum of a month, but nowadays the international community predicts that almost 1.5 million people are imprisoned in “education” centers (Wang and Kong, 2019). These programs are focused on stripping away the local culture and eliminating anything related to the religion of Islam. Additionally, the government prioritizes putting pressure on citizens abroad as well. In this way, the government is thought to have control over the Uygur diaspora’s movement, so that the chances of them being radicalized are lower (Wallace, 2014). In short, the counterterrorism policy of China heavily relies on the prevention of any activity related to “terrorism” in their perception, which results in the oppression of minorities and major surveillance in the name of security. Hence, it is a confrontational approach given that their measures are focused on the pursue category as seen in Table 1.

#### **4.1.3. USA**

The USA’s strategy for fighting terrorism is divided into two groups - domestic and international. The Department of State delegates the power to the Bureau of Terrorism, which has several institutions (Antiterrorism Assistance Program, Counterterrorism Partnership Fund, Terrorist Screening, Interdiction Program, and many more). According to their most recent national strategy for combating terrorism, they emphasize several pillars - investigating and sharing terrorism-related information, preventing mobilization of terrorists, and disrupting their activity (UN National Security Council, 2021). More detailed information about these pillars is given in Table 1. Based on specific measures the US is taking due to their national strategy for domestic counterterrorism approved by Biden in 2021, and the international strategy in 2018 approved by the previous administration of Donald Trump (US Director of

National Intelligence, 2018), it is clear that the government's approach is comprehensive in all aspects of Dongen's model. Hence, it is a maximalist approach according to Dongen's classification. However, the prevalent policy category for the USA is preventive measures compared to other countries in the table. The American maximalist policy of counterterrorism has elements of a human-agent approach given that they aim to sustain a dialogue with the community, and as Dongen explains "direct contact" to tackle the roots of the issue (p.235).

**Table 1.** Russia's, China's, and the USA's approach to counterterrorism (2018 - 2022)

<b>Overview</b>	<b>USA</b>	<b>Russia</b>	<b>China</b>
<b>Prevent</b>	1.Enhancing institutional research for key trends in terrorism analysis 2. Enhancing community and individual resilience against extremist ideas	1. Countering the spread of terrorist propaganda in online space	1.Establishing centralized political and ideological re-education programs
<b>Pursue</b>	1.Increasing information sharing across various agencies 2.Improving cooperation with countries to limit financing and recruitment 3. Training US Attorney Offices' for quality investigation and prosecution of terrorists	1.Prohibiting leaders and supporters of extremist groups from participating in parliamentary elections 2.Simplifying prosecution of people affiliated with extremist/terrorist groups 3. Monitoring financial institutions for compliance with the provision on terrorist financing	1. Enhancing collective detention of people who pose possible threats 2. Increasing intelligence-gathering techniques 3. Maintaining surveillance state procedures 4. Conducting wide security rallies 5. Monitoring the locations of people abroad via smart cards
<b>Protect</b>	1.Ensuring pre-employment background checks and screening 2.Enhancing ways to	1.Enhancing the security of critical infrastructure and life support facilities 2.Targeting the origins of	1.Embedding "convenience police stations" in the cities 2.Limiting the

	disrupt terrorist travels	terrorist groups before it spills to the state territory	movement abroad by restricting passport usage
<b>Respond</b>	1.Preparing the public how to respond and recover fast following an attack 2. Maintaining the functionality of emergency alert systems.	1.Conducting border military exercises with partner states 2.Supporting combat-ready facilities and human resources 3.Ensuring operations by special units in places with high levels of terrorist threats	

## 4.2. CT Strategy of International Organizations

Considering the high activity level of two countries (Kazakhstan and Kyrgyzstan) in the following organizations - Commonwealth of Independent States (CIS), Organization for Security and Cooperation (OSCE), Shanghai Cooperation (SCO), and United Nations (UN) - their counterterrorism policies are advocated for Central Asian states. The display of counterterrorism policies of these international organizations is given in Table 2.

### 4.2.1. CIS

CIS is an organization that directs its cooperation in several ways such as financial, economic, humanitarian, interparliamentary, and security. It emphasizes the harmonization of the national legislation of the CIS member states. One of the primary objectives of CIS in the field of counterterrorism is to encourage member states to cooperate in the online domain. Recognizing the role internet propaganda plays in radicalization, it proposes for member states to have unilateral laws identifying materials of terrorist and radical nature (Содружество Независимых Государств, 2019). Moreover, CIS places significant importance on the cooperation between member states to share databases on the movement of potential terrorists.

Tracking them helps the member states coordinate their responses effectively (2019). Lastly, CIS focuses on carrying out military exercises. They are organized approximately once per year uniting the military and law enforcement of CIS members (Omeliicheva, 2010). Overall, given that this organization has a policy tackling terrorism in three directions, it demonstrates pursue and respond categories of Dongen's model aligned with Russia's counterterrorism approach.

#### **4.2.2. OSCE**

OSCE seeks to tackle the underlining issues that plant the seeds of terrorism. The main goal of OSCE is to address the socioeconomic problems in countries by increasing the effectiveness of democratic institutions as means of preventing radicalization. By promoting democratic values and good governance, OSCE tackles the grievances of potential terrorists (OSCE Permanent Council, 2012). OSCE is the only organization in the list that acknowledges the experience of victims who suffered from terrorism. It calls for psychological and material help for them. In this way, OSCE puts a priority on the category of prevention as they seek to address deeper causes of terrorism (OSCE, 2020).

#### **4.2.3. UN**

Moving on to the UN, it has a specific program dedicated to Central Asian states. This Joint Plan of Action (JPoA)'s main task is to facilitate cooperation between the Central Asian states and offer them guidance in policy-making for counterterrorism (UN Office of Counter-Terrorism). This program has four phases. The first two aimed at establishing a dialogue between religious leaders and the governments. The third, which lasted between 2018-2021, offered direct assistance in policy implementation. For example, due to this program, the UN Office of Counter-terrorism sent personnel to Ashgabat in Turkmenistan and Bishkek in Kyrgyzstan. The most important initiative that JPoA brings to Kazakhstan and Kyrgyzstan is to

support them in drafting the national counterterrorism policy based on the pillars displayed in Table 4. Given that the UN's Special Task Force is active in these countries with financing projects and policy-making, it could be concluded that the backbone of their national strategy is established by them (UN Office of Counter-Terrorism). In this way, the UN's approach to counterterrorism policy is maximalist following Dongen's model as it emphasizes the work in all the categories. In fact, Dongen highlights that the categories are based on UN Office on Drugs and Crime's policies, thus this framework resembles the UN's work a lot.

#### **4.2.4. SCO**

Lastly, SCO is also an important factor in shaping the counterterrorism policies of Kazakhstan and Kyrgyzstan. The member states of SCO are concerned with the raising threat from "Islamic terrorism" as it is phrased. According to Wang and Kong (2019), Afghanistan under Taliban rule poses a great danger to Central Asian countries as well as China. It is reported that some terrorist fighters were trained in China's Xinjiang Uygur Autonomous Region. The Chinese authorities claim that the region faced thousands of attempts at terrorist acts killing many civilians and police officers. Hence, it is not surprising that China is a main actor in SCO that advocates for strengthening counterterrorism policies. Taking the leading role in SCO, China made it possible to sign several documents for counterterrorism cooperation. The most recent ones are the statements from the member states to fight terrorism signed in Astana, Kazakhstan in 2017 highlighting the successful cooperation in the region. There are counterterrorism exercises carried out almost every year, where China serves as a main location. Hence, using the platform of SCO, China expands its influence in the region to tackle the issue of terrorism, which translates into similar counterterrorism policies the organization proposes (Wallace, 2014). SCO resembles Chinese counterterrorism policy with less intensity, and thus, they take the same approach (confrontational) in accordance with Dongen's model.

**Table 2.** An overview of general trends for counterterrorism policies in relevant international organizations

Organization	Policy Description
Commonwealth of Independent States	Emphasizes the improvement of existing legal mechanisms for information counteraction to terrorism (countering the use internet for posting materials of terrorist and extremist nature, including the establishment of uniform criteria for their recognition). Obtaining and verifying information about the places of possible locations of persons put on the interstate wanted list for committing or suspected of committing crimes of a terrorist nature. Identification and blocking of routes of movement in the territories of states. Conducting joint exercises with troops and air defense systems of the CIS member states "Combat Commonwealth - 2021".
Organization for Security and Co-operation in Europe	Recognizes the role of negative socioeconomic factors as breeding soil for the emergence of terrorism, and thus, prioritizes the strengthening of democratic institutions. Promotes maintenance of international legal framework for prosecution of terrorists. Calls for a cooperative response from state members both in private and public spheres. Places a special role in helping the victims of terrorist attacks.
The United Nations	Emphasizes raising awareness on terrorism issues in Central Asia and on prevention: offers technical training courses and online learning classes for police agencies on terrorism, violent extremism, and human rights. Focuses on solving grievances among marginalized and most vulnerable groups. Assists in developing national strategy for combating terrorism including establishing a dialogue with religious leaders and the youth.
The Shanghai Cooperation Organization	Assists the competent authorities of each member-state in the fight against terrorism: creating a databank of terrorist groups, their leaders, structures, and ways of financing. Helps with the preparation and conduct of anti-terrorist command and staff as well as operational-tactical exercises. Enhances cooperation across various agencies in member states. Conducts joint exercises and personal training. Exchanges information on forensic data and new technology for combating terrorism.

### 4.3. CT Policy of Kazakhstan and Kyrgyzstan

#### 4.3.1. Kazakhstan

Having classified the models and linking them to the agents, this section is now dedicated yet to another descriptive inference specifically concerning the case of Kazakhstan. Kazakhstan is one of the most rapidly developing countries in Central Asia. After it gained independence in 1991, the country started its journey of fighting terrorism. For example, in 2005, President Nazarbayev addressed terrorism and religious extremism as threats of the 21st century (Omeliicheva, 2010, p.84). The National Security Committee established a special unit for the fight against terrorism leading to systematic training between various security departments including the police. The government emphasizes the work with religious organizations, but it banned most of the “non-traditional” Islam directions (Reshetnyak and Omeliicheva, 2019).

Nowadays, the approach Kazakhstan takes to counterterrorism policy is multi-dimensional. Despite the fact that the country did not face any major terrorist threats in the last few years, it extensively continues working with international organizations and other states (China, Russia, and the USA) to establish stronger cooperation in the field of counterterrorism. That is why, to assess the influence of these actors on Kazakhstan’s policy, the recent national strategy for tackling terrorism is given in Table 3 (Prime Minister of the Republic of Kazakhstan, 2018).

**Table 3.** The summary of the main pillars of State Program for Countering Religious Extremism and Terrorism in the Republic of Kazakhstan (2018-2022) and The National Strategy for Countering Terrorism and Religious Extremism in Kyrgyzstan (2017 - 2022)

Kazakhstan	Kyrgyzstan
1. Creating a society with zero tolerance for radical manifestations and immunity to radical ideology, which will be achieved by holding public events (round tables, seminars), sociological research as well as the preparation of information materials	1. Improving the activities of state and non-state bodies in the field of prevention of extremism and terrorism by supporting research activities that deepen understanding of the problems; and conducting a combined set of outreach activities, campaigns, and public events among student youth, local

(topics, booklets, videos); conducting information and explanatory work through the internet and social networks.	communities, and the general public, with an emphasis on promoting religious literacy.
2.Reducing the influence of external factors on the radicalization of the population by the state by improvement of technical means and measures for detection and neutralization facts of propaganda of terrorism and religious extremism on the internet along with ensuring border control and strengthening the infrastructure there.	2.Improving the practice of special state and law enforcement agencies to prevent and suppress manifestations of extremism and terrorism by increasing the potential of employees of law enforcement agencies, state bodies, and local governments.
3.Increasing the effectiveness of identifying and suppressing the facts of religious extremism and terrorism by improving the professional qualifications of personnel and workers, training for the internal bodies to detect and investigate crimes of a terrorist nature as well as increasing the staffing of departments of bodies internal affairs involved in counterterrorism.	3.Improvement of legislative mechanisms and interaction in the field of countering terrorism by raising the level of knowledge and religious literacy of convicts, improving conditions for their socialization and rehabilitation/reintegration systems., and synchronizing the legislation with international documents on combating terrorism and UN Security Council resolutions.
4.Improving the response to acts of extremism and terrorism, and minimization and/or elimination of their consequences through anti-terrorist exercises, drills, and experiments on the readiness of forces and units of law enforcement agencies.	

The above directions that Kazakhstan upheld over the last four years clearly show the government's inclination towards the human agent approach as all of them include the dialogue with the citizens through the content on the internet and media. However, Kazakhstan seems to have a high score in *respond* category as well with its planning and damage control in the case of a possible terrorist act. This highly overlaps with the measures Russia implements in the *respond* category as well. Although Kazakhstan's policy is mainly shaped by the UN and OSCE according to the table, it has elements of Russia's policy as both focus on military training and



exercises (*point 4*). Given that CIS is a platform for Russia to obligate member states for mandatory interstate exercises (Omelicheva, 2017), it is clear that Kazakhstan's counterterrorism policy takes the same measures. Hence, experiencing pressure from Russia, Kazakhstan adopts similar measures as CIS promotes confirming the hypothesis 1a.

Besides that, the summarized policy in Table 5 illustrates a lot of resemblance with the UN and OSCE's counterterrorism policies, as *point 1* displays one of the main pillars of the UN's Joint Action Plan - engagement with the community and regulation of the media. Additionally, Kazakhstan seeks to create a society with immunity to radical ideologies, which is the exact point the UN highlights in phase IV of the JPoA as the improvement of the resilience of the youth to terrorism. As for OSCE, it has a lot of measures in the category of prevention which also aligns with *point 1* because both put emphasis on tackling the root causes of terrorism. Hence, Kazakhstan allocates a lot of resources for discussions and round table seminars involving the youth and vulnerable groups.

In fact, both the UN and OSCE's policies heavily overlap with the USA's approach to counterterrorism. Given that the US changed its direction in countering terrorism, as mentioned previously, it has a human-agent approach - *prevent and pursue* - prioritizing measures undertaken by human agents. This includes government-community dialogue and criminal procedures and investigations. *Point 1 and 3* aligns with them respectively. While *Point 1* resembles OSCE, the UN, and America's main policy priority, *Point 3* which concerns the qualifications and training of people in the criminalization of terrorist activities overlaps with the USA's commitment to *pursue* category.

Lastly, the influence of China through SCO could not be seen in this strategy of Kazakhstan. Many claim that China's interest in Kazakhstan is limited to economic cooperation (Guerrero, 2021). Given that the overall model of Chinese counterterrorism is confrontational, Kazakhstan does not seek to emulate the same model as it can backfire because of the close

partnership with other actors. Therefore, Hypothesis 1b is not supported by the evidence, so instead of aligning its policy with China, Kazakhstan established tight coordination in counterterrorism measures. For example, the country actively returns Uyghur activists back to China without any regard for international human rights (Greitans et al., 2020).

A descriptive inference above showed what models Kazakhstan chooses to adopt whereas this section examines the causal inference by presenting a possible explanation that all of the actors mentioned above (Russia, the USA, OSCE, and the UN) are reference groups for Kazakhstan. International organizations (OSCE and the UN) facilitate the leading role Kazakhstan wants to take in the Central Asian region. It is evident that the UN has the highest influence on counterterrorism policy as it has a station in the country dedicated to assisting with drafting the policy. As for OSCE, Kazakhstan is concerned with its role in the organization. For example, in 2007, the government drafted legislation that would give licenses to religious groups, restricting the right of minor religious associations. However, after being heavily criticized for the violations of human rights, Kazakhstan abandoned that amendment before the meeting at OSCE, where the country was filing for the chairmanship. In fact, after successfully getting the chairmanship confirmation at OSCE for 2010, it returned back to the legislation and passed it in parliament (Bayram, 2009; Omelicheva, 2010).

The cooperation with the USA is also quite meaningful but not to the degree of Russia's influence. Evidently, the USA's interest in the counterterrorism policies of Kazakhstan was at its high after 9/11. The US Department of Defense has a lot of resources invested in the country that brings military assistance to the Kazakh government. As Omelicheva (2010) puts it the Central Asian states' cooperation with America is "not driven by aspirations to join the Alliance" (p.10), but to open a way for recognition and investments from the Western World.

When it comes to Russia, Kazakhstan, being the post-soviet country that has the longest border with Russia, is tied to it through economic and political cooperation (Nygren, 2007).

Besides the active increase in the scope of bilateral trade with Russia, Kazakhstan's political elite have tight connections with Moscow (Khan and Sultana, 2021; Omelicheva 2007a, 2009a, 2010). Therefore, it is indisputable that Russia serves as a reference group for Kazakhstan in many areas including the security issue of terrorism.

#### ***4.3.2. Kyrgyzstan***

Kyrgyzstan is also a Central Asian country bordering Kazakhstan, China, Uzbekistan, and Tajikistan. After the collapse of the Soviet Union, the country faced major issues to deal with including the rising threat of terrorism. In the early years of independence, Kyrgyzstan experienced major terrorist attacks which were linked to the Islamic Movement of Uzbekistan and the East Turkistan Liberation Organization (Omelicheva, 2007a; Lynch et al., 2016). However, it has been in a stable decline in the last few years. Hence, the government's narrative about the existing threat of terrorism and religious extremism seems overexaggerated (Gamza and Jones, 2021).

Despite having a relatively low level of terrorist risk, Kyrgyzstan's government actively works on counterterrorism policies. For example, the last strategy - The National Strategy for Countering Terrorism and Religious Extremism in Kyrgyzstan (2017 - 2022) - highlights that 560 people left the country in 2015 to join Islamic State (ISIS). It contains three pillars that according to the Kyrgyz government have worked. They target state and non-state bodies' activity, law enforcement agencies, and legislative mechanisms. The particular measures in these three directions are given in Table 5. (Ministry of Justice of the Kyrgyz Republic, 2017)

The descriptive inference analysis of these objectives reveals that the state's approach to counterterrorism policies is the human-agent approach. The strategy emphasizes human interaction in tackling the threat of terrorism or radical extremism because it includes a lot of work with local people and youth during public events and the education of convicts. It is

evident that the policy was mainly influenced by the UN. These measures explicitly mention the UN's fight against terrorism and radical extremism, and provide the means to synchronize with them. For example, JPoA prioritizes materials that raise awareness of terrorism, which is what *Point 1* and *Point 3* are aimed at because working with the local people and the convicts is dedicated to improving their religious education. Hence, it is evident that the national policy that was active in Kyrgyzstan between 2017-2022 was mainly the product of the UN, which confirms hypothesis 2.

However, having examined the close relationship between Kyrgyzstan's policy and the UN's JPoA, the policy's resemblance with other international actors are less apparent. The confrontational approach of Russia and its platform CIS along with China's policy in SCO is absent. For example, Russia's distinctive feature is relying on military training and exercises. While Kyrgyzstan regularly participated in joint exercises with SCO (in 2007 "Issyk-Kul-Antiterror-2007" ) and with CIS (in 2014 "Peace Mission"), in the last few years it did not send any units/special forces (Nygren, 2007; Omelicheva, 2009c). Therefore, it might be that the government decided to change the direction of the policy to a less confrontational model. It is believed that Bakiev had plans to cooperate with CIS, SCO, and the Collective Security Treaty Organization in the field of counterterrorism. However, during the administration of Jeenbekov, the state changed its approach to a more human-agent approach.

As for the US, given that it has a maximalist approach, it overlaps with Kyrgyzstan's policy in the *pursue* and *prevent* categories. Both seek to engage with people and train the staff of any institution that is involved in criminalizing the terrorist act. A plausible explanation is the fact that America and the Western Allies are the main reference group for Kyrgyzstan (Sadik and Ispir, 2021). For instance, America is a supplier of some modernized technology for defense facilities, uniforms, and equipment for several institutions of the Kyrgyz government (Omelicheva, 2010). Moreover, the USA directly sponsored the facility training the National

Guard. Kyrgyzstan allowed the American troops to use the Manas International Airport and opened its airspace to help the US in its fight with the Taliban. In this way, as Omelicheva (2010) claims “A small, landlocked country with a narrowly specialized economy, Kyrgyzstan has been compelled to embrace the perspectives and policies promoted by these states” (p.137), the country is dedicated to aligning its policy with many international actors, especially with the US and the UN in the hopes to repel its dependency on Russia and China (Shaymergenov, 2008).

Despite that, its reference groups still are Russia and China. Russia’s influence on Kyrgyzstan’s ruling elite is undoubtedly present because of historical, cultural, and geographical factors. This proximity to both China and Russia puts the Kyrgyz government in a difficult position as it is forced to rely on economic connections to them. Hence, the economic integration with Russia through Eurasian Union and CIS, and with China through SCO made them important players in the decision-making process in Kyrgyzstan. For example, Kyrgyzstan participated in numerous military exercises with them in the fight against terrorism (Ratushnyak and Sokol, 2019). Although the data shows Kyrgyzstan’s active membership dating back to the early 2000s, China and Russia still remain crucial reference groups. In fact, Omelicheva (2010) labels Russia as a “normative reference group” for Kyrgyzstan because when a state does not know how to deal with a certain issue, it relies on a reference group's lead in policy making. As a result, considering that the threat of terrorism is shared among Central Asian states, and consequently, with Russia and China too, Kyrgyzstan’s decision to use them as reference groups is expected. However, the recent national strategy does not comply with the counterterrorism policies of China and Russia much because of the presence of the UN’s plan and guidance with policy-making confirming the hypothesis 2.

## 5 Conclusion

This paper examined the counterterrorism policies of Kazakhstan and Kyrgyzstan with a focus on the influence of international actors (Russia, China, the USA, UN, OSCE, CIS, and SCO). It argued that both Kazakhstan and Kyrgyzstan in having to choose the policy direction heavily rely on other actor's experiences. Using Dongen's model and tables on while Kazakhstan's perspective on fighting terrorism has elements of Russian' confrontational approach and the UN's and the OSCE's approach as well as the USA's maximalist approach, Kyrgyzstan counterterrorism policy mainly stems from the UN's JPoA. The analysis of the literature illustrated that the relevant theory is a reference group perspective as it emphasizes the role of regional organizations and powerful states' role in determining the counterterrorism policy of Kazakhstan and Kyrgyzstan. The application of the reference group theory in these cases illustrates that CIS, SCO, UN, and OSCE along with neighboring states Russia and China influence through various means the policies' directions.

This study highlights different theories that scholars use to approach the emergence of counterterrorism policy. Constructivism and rationalism are the two main theoretical frameworks that describe the effect of logic of the appropriateness and availability of resources respectively. However, rationalism ignores the impact neighboring states might have on the government's decision while constructivism does not offer any explanation on why some states' policies are more widely used than others'. Besides the two theories, securitization and the reference group theories are also used for a more comprehensive picture. As a result, the reference groups perspective is considered as the most relevant in the case of examining the influence of states and organizations on a particular policy. Moreover, it offers an explanation of why governments decide to adopt a certain behavior despite the national condition. For example, Kazakhstan and Kyrgyzstan's active fight against terrorism is present regardless of the fact that these countries do not have an urgent threat of terrorism.

To examine the influence of the reference groups of both countries, Dongen's model was used. By dividing the Russian, American, and Chinese counterterrorism measures into relevant categories that the Dongen model provides, the paper highlighted the main features of their policies. As a result, appropriate policy models such as confrontational, human-agent, and maximalist are assigned to each of the countries. Based on that table, Kazakhstan and Kyrgyzstan's models are also investigated, and hence, the similarities between them are analyzed. Likewise, the table summarizing the main policy features of OSCE, CIS, SCO, and UN is also given to draw the connection between them and Kazakhstan, Kyrgyzstan's recent national strategy of counterterrorism. This analysis showed that hypothesis 2 can be confirmed because Kyrgyzstan's counterterrorism policy is mainly shaped by the UN's agency. Hypothesis 1 (a and b) is not easy to deny or confirm because while the regional dynamics are important given that the neighboring countries (Russia and China) share the same security threat with Kazakhstan, the USA has some influence over Kazakhstan's counterterrorism policy as well as international organizations. For example, the USA sponsors various projects concerning security issues, but it is not involved in regional military and police training as China promotes SCO and Russia initiates CIS (Sadik and Ispir, 2021). Hence, hypothesis 1 has grounds, but the impact regional organizations have such as OSCE and the UN's regional project – JpoA is present as well but not to the extent of Russia and Chinese's interests.

Generally, the paper contributes to the studies of terrorism in Central Asia. Many papers examine the reasons people become radicalized, yet do not acknowledge the counterterrorism policies in the region. Therefore, studying this topic, particularly, in relation to the impact of third parties sheds light on the complex dynamics present in Central Asia. Moreover, this paper does not only analyze counterterrorism policies but combines bilateral relationships and geopolitics, which is why it offers a multi-dimensional perspective on the issue.

The study has numerous limitations that decrease the scope of the hypotheses. Firstly, the analysis mainly relies on secondary sources. Although the national counterterrorism policies are derived from primary sources, secondary sources were used to highlight the primary features of the policies. Additionally, the provided tables by no means offer a complete picture of the counterterrorism policies of each country and organization. Considering the time and space limitations, it was impossible to examine every measure implemented according to the policies. Hence, assigning the type of models of actors might have less validity. This brief summary of national strategies does not capture all the nuances, which is why it requires further investigation that includes a more detailed analysis of measures along with consideration of domestic factors in shaping the counterterrorism policies of Kazakhstan and Kyrgyzstan.



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## Appendix

<b>PREVENT</b>  Battle of ideas Tackling root causes Government – community dialogue	<b>PURSUE</b>  Pre-trial criminal procedures Post-trial criminal procedures Punitive terrorist behaviour Intelligence gathering and dissemination Terrorist finance Special state powers over civilians Other
<b>PROTECT</b>  Transport (maritime) Transport (aviation) Public transport Public / government buildings Customs and visa Others	<b>RESPOND</b>  Planning First responders Material preparedness / facilities Other

Source: Dongen, 2010.