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THE ROLE OF SPECIAL ECONOMIC ZONES IN SHAPING KAZAKHSTAN'S STATE EXPORT POLICY

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Abstract. Special economic zones are one of the key instruments of the Republic of Kazakhstan's industrial and investment policy; however, their contribution to national exports over nearly 25 years has amounted to only 0.3%, indicating a substantial gap between their investment potential and export performance. This study aims to identify the institutional causes of the low export performance of Kazakhstan's SEZ system in a context where the state provides an extensive preferential regime and has set a target of increasing non-resource exports to USD 52 billion by 2030. The methodological framework combines qualitative content analysis of regulatory and strategic documents, comparative analysis of 17 SEZs in Kazakhstan, classification of 469 priority activities by export orientation, and comparison of SEZ export indicators with the non-resource exports of their corresponding regions. The results show that 81.0% of priority activities are classified as export-oriented, while 93% of products manufactured by SEZ participants are sold on the domestic market. The existing system of target indicators records participants' export shares. Still, it does not provide for regulatory consequences in the event of non-compliance. At the same time, the

national export target has not been decomposed to the level of individual zones and their participants. The findings confirm the institutional nature of the constraints affecting SEZs' export function. The study proposes introducing a “preferences in exchange for exports” principle that links preferential treatment to participants' verifiable export commitments. The practical application of the findings lies in improving the state support mechanism for SEZs by differentiating preferences based on export performance, distinguishing between export-oriented and non-export activities, and establishing an independent statistical monitoring system for SEZ performance.

Keywords: special economic zones, non-commodity export, export policy, priority activity lists, institutional conditionality, Kazakhstan

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ҚАЗАҚСТАННЫҢ МЕМЛЕКЕТТІК ЭКСПОРТТЫҚ САЯСАТЫН ҚАЛЫПТАСТЫРУДАҒЫ АРНАЙЫ ЭКОНОМИКАЛЫҚ АЙМАҚТАРДЫҢ РӨЛІ

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Аннотация. Арнайы экономикалық аймақтар Қазақстан Республикасының өнеркәсіптік және инвестициялық саясатының негізгі құралдарының бірі болып табылады, алайда олардың жиырма бес жылға жуық уақыттағы ұлттық экспортқа қосқан үлесі небәрі 0,3%-ды құрады. Бұл аймақтардың инвестициялық әлеуеті мен экспорттық нәтижелілігі

арасындағы елеулі алшақтықты көрсетеді. Зерттеу мемлекеттің кең ауқымды преференциялық режим қалыптастырып, 2030 жылға қарай шикізаттық емес экспорт көлемін 52 млрд АҚШ долларына дейін ұлғайту мақсатын айқындаған жағдайда АЭА жүйесінің экспорттық нәтижелілігінің төмен болуына әсер ететін институционалдық себептерді анықтауға бағытталған. Зерттеудің әдіснамалық негізін нормативтік-құқықтық және стратегиялық құжаттарға жүргізілген сапалық контент-талдау, Қазақстандағы 17 АЭА қызметін салыстырмалы талдау, 469 басым қызмет түрін экспортқа бағдарлану белгісі бойынша жіктеу, сондай-ақ аймақтардың экспорттық көрсеткіштерін тиісті өңірлердің шикізаттық емес экспортымен салыстыру құрады. Талдау нәтижесінде басым қызмет түрлерінің 81,0%-ы экспортқа бағдарланған санатқа жататыны, алайда АЭА қатысушылары өндірген өнімнің 93%-ы ішкі нарықта өткізілетіні анықталды. Қолданыстағы нысаналы индикаторлар жүйесі қатысушылар экспортының үлесін тіркегенімен, көрсеткіш орындалмаған жағдайда нормативтік салдарларды көздемейді, ал ұлттық экспорттық мақсат жекелеген аймақтар мен олардың қатысушылары деңгейіне дейін декомпозицияланбаған. Алынған нәтижелер АЭА экспорттық функциясын шектейтін факторлардың институционалдық сипатын растайды. Зерттеу қорытындысы бойынша жеңілдікті режимді қатысушылардың верификацияланатын экспорттық міндеттемелерімен байланыстыратын «экспортқа айырбас ретінде преференциялар» қағидатын енгізу ұсынылады. Зерттеу нәтижелерінің практикалық маңызы экспорттық нәтижелілікті ескере отырып преференцияларды саралау, экспортқа бағдарланған және экспорттық емес қызмет түрлерін ажырату, сондай-ақ АЭА қызметіне тәуелсіз статистикалық мониторинг жүйесін қалыптастыру арқылы мемлекеттік қолдау тетігін жетілдіру мүмкіндігімен айқындалады.

Түйін сөздер: арнайы экономикалық аймақтар, шикізатты емес экспорт, экспорттық саясат, басым қызмет түрлері, институционалдық шарттылық, Қазақстан

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РОЛЬ СПЕЦИАЛЬНЫХ ЭКОНОМИЧЕСКИХ ЗОН В ФОРМИРОВАНИИ ГОСУДАРСТВЕННОЙ ЭКСПОРТНОЙ ПОЛИТИКИ КАЗАХСТАНА

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Аннотация. Специальные экономические зоны являются одним из ключевых инструментов промышленной и инвестиционной политики Республики Казахстан, однако их вклад в национальный экспорт за почти двадцать пять лет составил лишь 0,3%, что свидетельствует о существенном разрыве между инвестиционным потенциалом зон и их экспортной результативностью. Настоящее исследование направлено на выявление институциональных причин низкой экспортной результативности системы СЭЗ в условиях, когда государство располагает развёрнутым преференциальным режимом и декларирует цель увеличения несырьевого экспорта до 52 млрд долларов США к 2030 году. Методологическую основу исследования составили качественный контент-анализ нормативно-правовых и стратегических документов, сравнительный анализ деятельности 17 СЭЗ Казахстана, классификация 469 приоритетных видов деятельности по признаку экспортной ориентации, а также сопоставление экспортных показателей зон с несырьевым экспортом соответствующих регионов. Установлено, что 81,0% приоритетных видов деятельности относятся к экспортно-ориентированным, при этом 93% продукции участников СЭЗ реализуется на внутреннем рынке. Действующая система целевых индикаторов фиксирует долю экспорта участников, однако не предусматривает нормативных последствий за её невыполнение, а национальная экспортная цель не декомпозирована до уровня отдельных зон и их участников. Полученные результаты подтверждают институциональный характер ограничений экспортной функции СЭЗ. Сделан вывод о необходимости внедрения принципа «преференции в обмен на экспорт», предполагающего привязку льготного режима к верифицируемым экспортным обязательствам участников. Практическое применение результатов исследования связано с возможностью совершенствования механизма государственной поддержки СЭЗ посредством дифференциации преференций с учётом экспортной результативности, разграничения экспортно-ориентированных и неэкспортных видов деятельности, а также формирования системы независимого статистического мониторинга деятельности зон.

Ключевые слова: специальные экономические зоны, несырьевой экспорт, государственная политика, экспортно-ориентированная промышленность, экспорт, мировая торговля, экспортная политика.

Introduction. Shaping an effective export policy remains one of the priority tasks of the economic development of the Republic of Kazakhstan. The continuing dependence of national exports on a narrow range of commodity goods, the growing instability of global commodity markets, and mounting competitive pressure on investment resources make the structural diversification of foreign trade activity necessary. In this context, the state has consistently been building a regulatory framework to develop non-resource exports.

The Concept of the Trade Policy of the Republic of Kazakhstan sets a target to increase exports of non-resource goods and services from USD 41 billion to USD 52 billion by 2030 (Government of the Republic of Kazakhstan, 2025a). The Concept of the Investment Policy until 2030 establishes, as a priority, the attraction of investment into industries with high export potential and provides for bringing the infrastructure readiness of effective special economic zones up to 100% (Government of the Republic of Kazakhstan, 2025b). The Concept for the Development of the Manufacturing Industry for 2023-2029 sets, as a strategic objective, the creation of a highly productive, export-oriented industry with a growing share of value added (Government of the Republic of Kazakhstan, 2018). The 2019 Law of the Republic of Kazakhstan “On Special Economic and Industrial Zones” integrates special economic zones into the country's overall industrial and investment policy (Republic of Kazakhstan, 2019).

At the same time, despite an extensive regulatory framework, the gap between the declared goals and the actual performance of SEZs remains significant. According to the Supreme Audit Chamber of the Republic of Kazakhstan, 93% of output from special economic zone participants is sold on the domestic market (Supreme Audit Chamber of the Republic of Kazakhstan, 2021). The zones' cumulative contribution to national exports over their entire period of operation amounted to 0.3%. At the same time, the existing system of target indicators, which monitors the share of exports in total output within SEZ territory, is not linked to any regulatory consequences for participants who fail to meet the relevant targets. The national export target set out in the Concept of the Trade Policy has not been disaggregated to the level of individual zones. It has not been translated into obligations for specific participants.

Under these conditions, special economic zones represent an instrument with considerable potential for developing non-resource exports, yet one that realises this potential only to a limited extent. Their institutional role is defined not only by the preferences they provide but also by their capacity to create an environment conducive to locating export-oriented production, deepening processing, and integrating domestic enterprises into global value chains.

Literature review. A substantial body of research has accumulated on the role of special economic zones in stimulating exports and attracting foreign direct investment. The experiences of China and India are traditionally regarded as the most instructive. In both countries, SEZs made a significant contribution to

economic growth by expanding export supply and foreign capital inflows (Leong, 2013). The Indian model deserves particular attention: the SEZ Act, adopted in 2005, laid the foundation for accelerated export-led industrialisation, although the policy's implementation was accompanied by several structural contradictions related to infrastructural unpreparedness and weak inter-agency coordination (Mukherjee & Zafar, 2016; Sarangedevot et al., 2014; Shukla, 2016). Studies of sub-Saharan African countries show that SEZs can reduce export concentration and increase diversification, even without a radical restructuring of sectoral composition, which is especially relevant for resource-dependent economies (Sukadi, 2025). European evidence indicates that participation in an SEZ regime increases the probability that firms enter foreign markets, although the intensity of this effect varies with country-specific conditions (Nazarczuk & Umiński, 2018). With respect to the Kazakhstani context, particular interest attaches to the study of the “Qyzyljar” SEZ, which showed that such zones can also serve as platforms for human capital development alongside their production functions (Alibay et al., 2025).

At the same time, several studies record systemic constraints characteristic of SEZs in transition economies. T. Farole found that infrastructure gaps substantially reduce the attractiveness of zones to investors, especially in landlocked and transition economies: a preferential tax regime does not compensate for the absence of a ready-made production site (Farole, 2011). UNCTAD notes that modern SEZs achieve sustainable outcomes only when they foster cluster synergies between domestic enterprises and global partners, thereby ensuring technology transfer and productivity growth (UNCTAD, 2019). In the context of post-Soviet countries, studies record similar patterns: policy inconsistency, weak subnational governance, and infrastructure bottlenecks lead SEZs to reproduce an enclave model of development without meaningful links to the local economy.

With respect to Kazakhstan, the most systematic assessment is provided by a diagnostic study by the Asian Development Bank (2018). The report states that only a small number of zones have partially achieved their planned indicators, while most SEZs fall substantially short of expectations. Among the reasons cited are incomplete infrastructure, low levels of foreign investment, limited export orientation, and high per-job expenditure. Institutional problems, including insufficient managerial autonomy and departmental fragmentation, are treated as structural rather than situational.

The existing literature thus presents a consistent set of determinants of SEZ effectiveness; however, notable gaps persist: a systematic comparison of zones by export-orientation indicators and an analysis of the institutional gap between national export targets and the obligations of specific zone participants remain insufficiently studied. It is precisely this aspect that constitutes the subject of the present study. This study aims to identify the institutional opportunities and constraints of the Republic of Kazakhstan's existing system of special economic

zones as an instrument of state export policy. The study hypothesis is that the long-term effectiveness of SEZs is determined not by the scale of the tax preferences granted, but by the quality of the institutional environment, including the presence of reciprocal obligations on the part of participants, the level of infrastructure readiness of the sites, and the ability of the zones to ensure a sustained flow of competitive non-resource exports.

Materials and Methods. The methodological basis of the study is a qualitative analysis of the legal acts and strategic documents of the Republic of Kazakhstan that regulate the creation, operation, and state support for special economic zones and define the country's industrial, investment, and export development priorities.

The empirical basis of the study comprised: the Concept of the Trade Policy until 2030 (Government of the Republic of Kazakhstan, 2025a), the Concept of the Investment Policy until 2030 (Government of the Republic of Kazakhstan, 2025b), the Concept for the Development of the Manufacturing Industry for 2023-2029 (Government of the Republic of Kazakhstan, 2018), the Law “On Special Economic and Industrial Zones” of 2019 (Republic of Kazakhstan, 2019), the results of the state audit conducted by the Supreme Audit Chamber on the effectiveness of SEZ operations (Supreme Audit Chamber of the Republic of Kazakhstan, 2021), and Order No. 72 of the Minister of Industry and Construction of the Republic of Kazakhstan of February 22, 2024 (Ministry of Industry and Construction of the Republic of Kazakhstan, 2024), which establishes the lists of priority activities for each of the 17 special economic zones.

The study applies qualitative content analysis of regulatory and strategic documents using a predefined system of categories: attraction of investment, industrial development, export orientation, reciprocal obligations of participants, and clustering. A frequency analysis of these categories across documents from different time periods made it possible to trace the evolution of the state's approach to SEZs: from an instrument for attracting capital to an element of industrial and export policy.

An additional analysis was conducted of the lists of priority activities for all 17 SEZs. Each priority activity was classified according to its export orientation. Activities in Section “C” of the National Classifier of Economic Activities (NCEA), IT services, and R&D were classified as export-oriented; construction of social and residential facilities, medical activity, tourism, trade, and utility supply were classified as non-export. Based on this classification, the share of export-oriented priority activities was calculated for each zone, along with a coefficient of regulatory redundancy, defined as the ratio of the total number of priority activities to the number of export-oriented ones.

To assess the contribution of SEZs to regional economies, data on the cumulative exports of zone participants for 2021-2024 were compared with the non-resource exports of the corresponding regions, using data from the Bureau of National Statistics and the Committee of State Revenues. This approach makes it possible

to distinguish the region's scale effect from the actual relative contribution of a specific zone.

The comparative analysis of international experience is structured according to a single matrix: type of zone, key institutional mechanism, export outcome, and applicability to Kazakhstani conditions. The experience of China, India, Vietnam, Malaysia, Poland, Ethiopia, and sub-Saharan African countries is examined.

The study is qualitative and analytical in character. Its subject is not a quantitative assessment of individual indicators of participants' activity, but the institutional logic of state policy, within which SEZs are expected to perform investment, industrial, and export functions simultaneously.

Results. Evolution of SEZ regulation: from a preferential regime to an element of industrial policy. An analysis of the regulatory framework shows that Kazakhstan's SEZ system has gone through several stages of development. At the initial stage, zones were created primarily as territories with a special regime to attract investment and stimulate entrepreneurial activity through tax and customs preferences. A link to industrial or export policy was practically absent from the regulatory documents of that period. As the legislative framework developed, the function of SEZs became more complex. The adoption of the Law “On Special Economic and Industrial Zones” in 2019 established a qualitatively different model: zones came to be regarded as elements of the country's overall system of industrial and investment policy, rather than as isolated preferential enclaves (Republic of Kazakhstan, 2019). The Concept for the Development of the Manufacturing Industry for 2023-2029 and the Concept of the Investment Policy until 2030 assigned SEZs the function of an infrastructural base for locating export-oriented production (Government of the Republic of Kazakhstan, 2018, 2025b). At the same time, content analysis of documents from different periods shows that this shift is largely declarative. The category “export orientation” appears considerably more often in the regulatory documents of the most recent period than in earlier editions. In contrast, the category “reciprocal obligations of participants” remains weakly operationalised. Preferences are granted for the fact of registration and the launch of production, rather than for a verifiable export outcome.

Table 1 – Stages in the evolution of the role of SEZs in Kazakhstan's state policy system

Stage	Main focus	Role of SEZs	Main constraint
Initial	Special legal regime and attraction of investment	Preferential territory	Weak link with industrial and export policy
Intermediate	Industrial-innovation development	Site for locating production	Limited cooperation and weak export selectivity
Current	Non-resource growth, manufacturing industry, export transformation	Institution of industrial and export policy	Incomplete infrastructure readiness, absence of reciprocal obligations

Infrastructure readiness and investment results. According to the Concept of the Investment Policy until 2030, 17 SEZs are currently operating in the country,

with a total area of 20.4 thousand hectares. The infrastructure readiness of the sites is estimated at 57.6% in official documents. However, this figure relates predominantly to long-established zones. Taking into account new SEZs, where engineering preparation is only just beginning, actual readiness, according to available estimates, does not exceed 54%.

Between 2002 and 2022, 321 projects were launched on SEZ territory, more than 22 thousand jobs were created, and tax revenues amounted to KZT 341.4 billion, while infrastructure expenditure totalled KZT 399 billion. The volume of investment attracted reached KZT 2,610.9 billion, corresponding to an investment multiplier of 6.6: for every tenge of budget funds invested in infrastructure, 6.6 tenge of private investment was attracted.

At the same time, more than 65% of industrial investment in SEZs has been provided by quasi-state-sector companies. International experience, above all the Chinese model, indicates that commercial independence of managing companies and a predominance of private capital are necessary conditions for genuine export competitiveness.

Export results: the gap between potential and reality. The cumulative contribution of SEZs to national exports over their entire period of operation amounted to 0.3% (Supreme Audit Chamber of the Republic of Kazakhstan, 2021). According to the Supreme Audit Chamber, 93% of output from zone participants is sold on the domestic market. Over the period 2021-2024, the cumulative exports of SEZ participants differed substantially across zones. The leaders in absolute export volume are NINT (USD 382 million), Pavlodar (USD 273 million), and the “Astana – New City” SEZ (USD 255 million). Five zones – TURAN (formerly Turkistan), Jibek Joly, Astana-Technopolis, Alatau, and ICBC “Khorgos” – show zero or near-zero exports over the period analysed.

At the same time, absolute export indicators provide a distorted picture because they do not account for the scale of the regional economy. A more accurate measure is the share of SEZ exports in the region's non-resource exports. By this indicator, the leaders are Pavlodar (13.0%), the “Astana – New City” SEZ (8.6%), and “Ongtustik” (7.5%). NINT, which ranks first in absolute terms, accounts for 6.6% of the Atyrau region's non-resource exports. It is fundamentally important that TURAN, with an accumulated investment of KZT 536 billion, has a zero share in the Turkistan region's exports. This clearly confirms that investment outcomes and export outcomes are fundamentally different indicators that should not be conflated when assessing the effectiveness of the zones.

Analysis of priority activities: the export orientation of the lists. Across the system of 17 SEZs, a total of 469 priority activities were recorded, of which 380, or 81.0%, are classified as export-oriented production, while 89, or 19.0%, are activities whose market is domestic consumption. The average share of export-oriented priority activities within a single zone is 83.5%.

The lists that are cleanest from the standpoint of the export function belong to

the “Ongtustik” and “Atyrau” SEZs – 100%. NINT shows 95.8%, and “Korkyt Ata” – 94.7%. At the opposite end of the scale are ICBC “Khorgos” (43.8%) and TURAN (59.0%). These cases, however, are fundamentally different: the ICBC was created as a trade-and-service zone, whereas TURAN has a full-fledged production core of 23 positions from Section “C” of the NCEA, supplemented by a block of 16 construction, tourism, and service positions.

Table 2 – Share of export-oriented priority activities by SEZ in Kazakhstan

SEZ	Region	Total priority activities	Export-oriented priority activities	Share, %
Ongtustik	Shymkent city	23	23	100.0
Atyrau	Atyrau region	7	7	100.0
NINT	Atyrau region	24	23	95.8
Korkyt Ata	Kyzylorda region	19	18	94.7
Jibek Joly	Zhambyl region	25	23	92.0
Qyzyljar	North Kazakhstan region	25	23	92.0
Pavlodar	Pavlodar region	25	23	92.0
Khorgos – Eastern Gate	Almaty region	28	25	89.3
Astana – New City	Astana city	34	30	88.2
PIT	Almaty city	33	29	87.9
Saryarka	Karaganda region	27	23	85.2
Astana-Technopolis	Astana city	33	27	81.8
Alatau	Almaty region	30	23	76.7
Aktau Seaport	Mangystau region	35	25	71.4
Aktobe	Aktobe region	30	21	70.0
TURAN	Turkistan region	39	23	59.0
ICBC Khorgos	Almaty region	32	14	43.8
Average		27.6	23.1	83.5

Note: compiled by the author based on Order No. 72 of the Ministry of Industry and Construction of the Republic of Kazakhstan dated 22.02.2024 and amendments thereto (Order No. 256 of 11.07.2024).

A Systemic pattern is the construction or operation of a multidisciplinary hospital in the lists of eight of the seventeen zones. This indicates that the state deliberately uses the SEZ mechanism to attract investment in regional healthcare, granting medical facilities the same tax and customs preferences as those for industrial production. From the standpoint of export policy, this means that part of the preferential resource is directed toward subsidising activities that do not structurally generate export flows.

Statistical accounting: an institutional conflict of interest. A reliable assessment of the export performance of SEZs is hindered for a structural reason. The Ministry of Industry and Construction simultaneously formulates policy toward SEZs and reports on their effectiveness. There are no publicly available quarterly statistics for each zone, broken down by investment, production, and exports. The Bureau of National Statistics does not maintain such data. As a result, the target indicator

“share of participants' exports in output,” set out in each zone's monitoring system, cannot currently be independently verified. Uzbekistan has resolved this problem differently: SEZ statistics there are published by the state statistics committee, embedding them within the overall system of state accounting.

Discussion. The institutional gap between the national target and participant behaviour. The findings support the conclusion that the low export performance of Kazakhstani SEZs is not due to a lack of preferences, but to the absence of a regulatory link between the preferential regime and a participant's export outcome. The state has an extensive support toolkit at its disposal: zero corporate income tax (CIT), exemptions from land and property taxes, customs preferences for the import of raw materials and equipment, and state financing of infrastructure. At the same time, an SEZ participant enjoys all of these preferences regardless of whether it exports its output or sells it exclusively on the domestic market.

Of particular significance in this context is the indicator “share of exported output in total production on SEZ territory,” established as part of the system of target indicators for each zone. This indicator exists, but it performs an observational rather than a regulatory function. Failure to meet it entails no consequences for the participant. The state thereby measures what it considers important, without creating any incentive to achieve it.

Another circumstance is also of fundamental importance. The Concept of the Trade Policy sets a national benchmark for non-resource exports of USD 52 billion by 2030. However, a mechanism to decompose this target at the level of special economic zones is absent from the current regulatory documents (Government of the Republic of Kazakhstan, 2025a). None of the 17 zones has a target indicator that defines its contribution to achieving the national benchmark, and no participant receives a regulatory signal regarding what its individual export outcome should be. The state maintains two disconnected elements: a national export target at the top level and a system of preferences for participants at the bottom level, without building a regulatory bridge between them.

The regulatory design of priority-activity lists as a source of structural bias. Analysis of the lists of priority activities reveals a further dimension of the problem. The average share of export-oriented priority activities across the system is 83.5%, which, at first glance, appears high. However, it reflects potential rather than outcome. In the absence of reciprocal export obligations, a participant operating under a production-oriented priority activity may focus entirely on the domestic market while continuing to enjoy the preferential regime. This is precisely what explains the gap between the formally high share of export-oriented priority activities in the lists and the actual figure of 7% of participants' total output that is exported.

Expansions of the priority-activity lists in 2024-2025 moved in two opposite directions simultaneously. On the one hand, in several zones, production positions from Section “C” of the NCEA were added, thereby objectively strengthening

industrial potential. On the other hand, some of these expansions led to a dilution of sectoral specialisation and the inclusion of activities that were structurally unrelated to exports. Eight of the seventeen zones include in their lists the construction or operation of a multidisciplinary hospital, which receives the same preferences as industrial production. This indicates that SEZs are used by the state simultaneously as an instrument of industrial, investment, and social policy, which inevitably dilutes their export function.

An additional factor is the fragmentation of investment flows across zones with similar priority-activity lists. In the Atyrau region, NINT and the new “Atyrau” SEZ operate with an almost identical petrochemical profile. In Astana, “Astana – New City” and “Astana-Technopolis” operate with overlapping lists. Instead of concentrating a critical mass of residents at a single site, which is necessary to form a cluster effect, resources are dispersed among several legally independent regimes.

Infrastructure readiness as a precondition for export outcomes. International experience clearly indicates that a site's infrastructure readiness is not incidental but a determining factor in attracting export-oriented investors (Farole, 2011). Ethiopia's industrial-park model is built on the principle of full infrastructure readiness before attracting residents: it is precisely this that has enabled it to attract major global buyers and secure a multiple increase in light-industry exports within three years. Kazakhstan's system is moving in the opposite direction: infrastructure is created in parallel with the attraction of residents, which creates uncertainty about timelines and raises investment risk precisely for those industries most sensitive to time lags – export-oriented industries.

The actual infrastructure readiness of the SEZ system, at around 54% when new zones are taken into account, means that almost half of potential sites are not ready for the rapid launch of production. At the same time, management teams often lack verified data on commissioning timelines for specific infrastructure facilities, making it impossible to provide investors with reliable benchmarks. This institutional gap is especially critical for export-oriented production, whose business model is built around strict external-contract deadlines.

Statistical opacity as a systemic constraint. The problem of statistical accounting deserves separate attention. A reliable, independent assessment of the export performance of SEZs in Kazakhstan is currently impossible for structural reasons: the body that formulates policy for the zones simultaneously reports on its results. This creates an institutional conflict of interest, a consequence of which is discrepancies in data even within a single official document. Transferring the statistical monitoring of SEZ activity to the Bureau of National Statistics is a necessary condition not only for transparency, but for the very possibility of verifying compliance with target export indicators. Without independent statistics, any export threshold will remain a nominal indicator. The experience of Uzbekistan, where the state statistics committee publishes data on SEZ activity, represents a directly applicable institutional benchmark.

Directions for reform. Taken together, the findings point to three interconnected directions for reforming the SEZ system, unified by a single regulatory principle of “preferences in exchange for exports.” By analogy with the practice already in force in Kazakhstan of “tariff in exchange for investment,” this principle implies that the volume of state support for an SEZ participant should be determined not by the mere fact of its presence in the zone, but by a verifiable share of exports in its production activity.

The first direction concerns the operationalisation of the existing target indicator “share of participants' exports in output.” In the current system, this indicator performs an observational rather than a regulatory function. It is proposed to introduce a progressive scale of preferences depending on the export share achieved. A participant exporting between 15% and 30% of its output retains the basic preferential regime. A participant with a share of 30% to 50% receives an expanded package that includes accelerated depreciation and priority access to the zone's infrastructure capacity. A participant exporting more than 50% of its output receives the maximum support regime, including priority service support through QazTrade and KazakhExport. It would be advisable to set rising threshold values, from 15% in 2026 to 35% by 2030, in line with the national export benchmark. Verification should be based on customs declaration data via QazTrade and on insurance support for export contracts via KazakhExport. This architecture does not penalise an orientation toward the domestic market. Still, it creates a sustained incentive to expand export activity. It provides a regulatory chain running from the national target of USD 52 billion down to the behaviour of a specific zone participant.

The second direction involves differentiating preferences according to the export nature of priority activities. Production positions from Section “C” of the NCEA should retain the full package of preferences. Construction, medical, and tourism positions should be supported through separate, non-fiscal mechanisms. This does not preclude the multifunctionality of zones, but it eliminates the current equalisation of fundamentally different types of activity within a single preferential regime. For new zones with compact and specialised lists, such as “Atyrau” and “Korkyt Ata,” it would be advisable to establish, as a regulatory norm, the principle of an unchanging anchor sectoral profile, making any expansion of the list conditional on mandatory export appraisal of the positions to be added.

The third direction concerns transferring the statistical monitoring of SEZs to the Bureau of National Statistics and introducing mandatory quarterly publication of data for each zone broken down by production, investment, and exports. Only with independently verifiable statistics do target indicators acquire practical meaning, and does state policy gain an evidentiary basis for decisions on allocating infrastructure resources among zones. The experience of Uzbekistan, where the state statistics committee publishes data on SEZ activity, represents a directly applicable institutional benchmark.

Conclusions. Kazakhstan's special economic zones have demonstrated the

ability to concentrate investment and build a production base: an investment multiplier of KZT 6.6 for every tenge of budget funds confirms that the capital-attraction mechanism works. With respect to the export function, however, the situation is fundamentally different. The zones' contribution to national exports over almost twenty-five years amounted to 0.3%, and 93% of participants' output is sold on the domestic market. The system is working exactly as it was designed: preferences are granted for the fact of registration and the launch of production, not for the delivery of output to foreign markets. This cannot be changed without revising the underlying regulatory principle.

The study supports the conclusion that the causes of low export performance are institutional rather than sectoral. Three interconnected gaps were identified. The first is between the national export target and the instrument for achieving it: the Concept of the Trade Policy sets a benchmark of USD 52 billion by 2030, yet a mechanism to decompose this target into zones and specific participants is absent. The second is the gap between the regulatory potential of the priority-activity lists and the actual export outcome: the average share of export-oriented priority activities is 83.5%, whereas only 7% of the output is actually exported. The third is the gap between monitoring and the possibility of independent verification: statistics on SEZs are compiled by a body with an interest in their results.

The study hypothesis is confirmed. The long-term effectiveness of SEZs is determined not by the scale of the tax preferences granted, but by the quality of the institutional environment. At the same time, improving the institutional environment does not require the creation of fundamentally new mechanisms: the necessary instruments already exist within Kazakhstan's system. The target indicator for export share is enshrined in each zone's monitoring system. The priority-activity lists have been approved and are regularly updated. The institutions for verifying export flows – QazTrade and KazakhExport – are operational. What is required is not the creation of a new architecture, but the reorientation of the existing one.

The central instrument of such reorientation should be the principle of “preferences in exchange for exports” – a progressive scale of state support under which the volume of a participant's preferences is determined by a verifiable share of exports in its production activity. By analogy with the existing practice of “tariff in exchange for investment,” this principle embeds export performance into the very logic of granting state support, rather than leaving it as an optional monitoring indicator. A progressive scale creates an incentive not only to reach a minimum export threshold, but also to raise it consistently, ensuring dynamics rather than static compliance with a formal criterion.

With the consistent implementation of the proposed measures, special economic zones could become not merely an instrument for attracting investment but a fully fledged element of state export policy, capable of making a verifiable contribution to achieving the Republic of Kazakhstan's national non-resource export benchmark.

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