The American Journal of Engineering and Technology
ISSN 2689-0984 Volume 08 - 2026

Implementing Ethical Rules of Artificial Intelligence into The National Legislation and Practice of Uzbekistan: A Comparative Legal Analysis

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Received: 28 Feb 2026 | Received Revised Version:12 Mar 2026 | Accepted: 02 Apr 2026 | Published: 28 Apr 2026

Volume 08 Issue 04 2026 | Crossref DOI: 10.37547/tajet/Volume08Issue04-14

Abstract

Despite the transformative potential of artificial intelligence (AI) across multiple sectors, its deployment generates significant risks for human rights, exacerbates structural inequality, and produces outcomes of limited predictability. These dynamics make the development of robust ethical and legal governance frameworks both urgent and complex. Uzbekistan adopted Ethical Rules for the development, deployment, and use of AI-based solutions in 2026, marking an important step in national regulatory development. Yet questions of implementation, understood here as the formal incorporation of normative principles into binding legal instruments and the establishment of institutional enforcement mechanisms, remain largely unresolved. This paper employs a comparative legal analysis method, grounded in soft law theory and legal transplant theory, to examine how Uzbekistan's emerging AI governance framework aligns with international standards, including UNESCO's 2021 Recommendations, the OECD Principles on AI, and the European Union's Artificial Intelligence Act. The analysis identifies six structural gaps in Uzbekistan's current framework and proposes a pathway from declaratory principles toward enforceable, institutionally supported standards. The paper contributes to the emerging literature on AI governance in transitional legal systems and to broader debates on the conditions under which soft law instruments can effectively constrain technological risk.

Keywords: Artificial intelligence governance, soft law, legal transplant, comparative legal analysis, Uzbekistan, ethical regulation, human rights, enforcement mechanisms.

Cite This Article: Darya Odilovna Abdalimova. (2026). Implementing Ethical Rules of Artificial Intelligence into The National Legislation and Practice of Uzbekistan: A Comparative Legal Analysis. The American Journal of Engineering and Technology, 8(4), 162–170. https://doi.org/10.37547/tajet/Volume08Issue04-14

1. Introduction

AI technologies are reshaping governance, public services, judicial processes, and economic activity at a pace that challenges the adaptive capacity of legal systems worldwide. When deployed appropriately, AI enables public authorities to enhance the quality of services, monitor citizen satisfaction, adjust program performance, and evaluate administrative effectiveness with unprecedented precision. When deployed without adequate governance, however, opaque algorithmic systems risk producing discriminatory outcomes, eroding accountability, and causing harms that outweigh projected economic benefits (UNESCO, 2021). These dynamics are not confined to technologically advanced jurisdictions. Emerging economies, including Uzbekistan, face simultaneous pressures: the imperative to adopt AI technologies to accelerate development, and

the need to establish governance frameworks capable of protecting rights and managing risk before regulatory capacity fully matures. This creates a structural tension between innovation velocity and regulatory readiness that is characteristic of what the literature on legal transplantation identifies as norm adoption in advance of enforcement infrastructure (Watson, 1993). The Republic of Uzbekistan adopted the Strategy for the Development of Artificial Intelligence Technologies until 2030 by Presidential Resolution No. PP-358 in October 2024, followed by Ethical Rules for the Development, Deployment, and Use of AI-Based Solutions, registered in March 2026. These instruments signal genuine regulatory intent. Yet, as this paper argues, they remain largely declaratory, establishing aspirational norms without the enforcement mechanisms, institutional architecture, or legal classification systems necessary to translate principles into practice.

This paper addresses the following research question: To what extent does Uzbekistan's current AI governance framework satisfy the conditions for effective implementation of international ethical standards, and what structural reforms are required to close the gap between declared principles and enforceable obligations? The paper proceeds as follows: section 2 defines the conceptual framework and key terms; section 3 sets out the methodology; section 4 reviews the theoretical and scholarly context; section 5 presents the comparative analysis; section 6 identifies structural gaps in Uzbekistan's framework; section 7 discusses findings and proposes reform pathways; section 8 concludes.

2. Conceptual Framework and Key Definitions

Conceptual clarity is a prerequisite for rigorous comparative legal analysis. Three terms are central to this paper and require precise operationalization before analysis proceeds.

2.1 Implementation

For the purposes of this study, implementation refers to the formal incorporation of international ethical AI principles into binding national legal norms, accompanied by the establishment of institutional mechanisms capable of ensuring compliance. This definition draws on the distinction in international relations scholarship between nominal adoptions, the formal endorsement of a normative instrument and substantive implementation, which requires procedural infrastructure, monitoring capacity, and sanctioning authority (Chayes & Chayes, 1993). A state that adopts non-binding ethical guidelines has engaged in nominal adoption, not implementation in this sense. Implementation is treated here as a spectrum rather than a binary outcome, ranging from purely declaratory norm adoption to fully institutionalized enforcement.

2.2 Soft Law

Soft law refers to normative instruments that lack legally binding force but influence state behavior through moral authority, international consensus, expert legitimacy, and reputational incentives (Abbott & Snidal, 2000). Soft law instruments, including recommendations, guidelines, principles, and codes of conduct are distinguished from hard law by the absence of formal sanctions for non-compliance. In the domain of AI governance, the UNESCO Recommendations (2021), OECD Principles (2019), and the United States' NIST AI Risk Management Framework (2023) constitute paradigmatic examples of soft law. Uzbekistan's 2026 Ethical Rules similarly qualify as soft law, as they do not establish enforceable obligations or sanctions. Soft law theory further predicts that states may strategically prefer soft instruments when they wish to signal commitment to international norms while preserving domestic flexibility, a dynamic this paper examines in the Uzbekistan context.

2.3 Hybrid Regulatory Model

A hybrid regulatory model, as used in this paper, denotes a governance framework that combines non-binding ethical guidelines with selective mandatory requirements, without constituting a fully codified legal regime. Hybrid models occupy an intermediate position between pure soft law systems (which rely exclusively on voluntary compliance) and pure hard law regimes (which are fully codified, sanctioned, and institutionally enforced). Uzbekistan's current framework is characterized here as hybrid because it combines internationally aligned ethical principles which are genuinely adopted with a near-total absence of enforcement mechanisms, creating a system in which value commitments are real but their legal operationalization remains incomplete.

3. Methodology

This study employs a comparative legal analysis method. Comparative legal analysis is an established methodology in legal scholarship that involves the systematic examination and interpretation of legal norms, regulatory frameworks, and institutional structures across multiple jurisdictions, with a view to identifying convergences, divergences, and explanatory patterns (Zweigert & Kötz, 1998). This method is

appropriate for the present study because the research question is fundamentally comparative: it asks how Uzbekistan's national framework relates to international standards and to the regulatory approaches of other jurisdictions.

3.1 Source Selection

Primary sources analyzed in this study include: Uzbekistan's Strategy for AI Development until 2030 (Presidential Resolution No. PP-358, 2024); Uzbekistan's Ethical Rules for AI-Based Solutions (Order of the Minister of Digital Technologies, reg. no. 3787, 2026); UNESCO's Recommendation on the Ethics of Artificial Intelligence (2021); the OECD Principles on Artificial Intelligence (2019, updated 2024); the European Union's Artificial Intelligence Act (2024); and the United States' NIST AI Risk Management Framework (2023). These sources were selected because they represent the principal international and comparative reference points for AI ethics governance, and because they are the instruments against which Uzbekistan's framework is most frequently benchmarked in academic and policy discourse.

Secondary sources include peer-reviewed scholarship from legal, governance, and technology studies, as well as academic contributions from Uzbek scholars working on AI regulation, digital governance, and international law. Secondary sources were identified through structured literature searches targeting the intersections of soft law theory, AI governance, and regulatory transplantation.

3.2 Analytical Procedure

The comparative analysis proceeds in two stages. In the first stage, a cross-jurisdictional comparison identifies how Uzbekistan's framework performs across eight governance dimensions derived from the international literature: legal status of the instrument; risk classification; requirement for human oversight; enforcement and sanction mechanisms; coverage of generative AI; existence of an independent regulatory authority; centrality of human rights; and degree of international alignment. These dimensions were selected because they represent the core functional requirements for effective AI governance identified in the scholarly and policy literature (Doshi-Velez et al., 2017; Cihon, 2019).

In the second stage, findings from the comparative analysis are interpreted through the lens of soft law theory and legal transplant theory to generate explanatory and prescriptive conclusions. Soft law theory is used to explain why Uzbekistan adopted a non-binding instrument and to assess the conditions under which such an instrument might generate behavioral change. Legal transplant theory is used to examine the dynamics of norm adoption from international frameworks into Uzbekistan's national legal context.

3.3 Limitations

This study relies primarily on official legal documents and published academic scholarship. It does not include empirical data on the implementation practices of AI developers or public authorities in Uzbekistan, nor does it incorporate stakeholder interviews or surveys. As a result, findings reflect a normative and institutional analysis of the regulatory framework, rather than an assessment of on-the-ground compliance behavior. Additionally, Uzbekistan's Ethical Rules were registered in March 2026 and have not yet generated a body of case law or regulatory practice; findings regarding implementation gaps are therefore prospective rather than retrospective.

4. Theoretical and Scholarly Context

4.1 Soft Law Theory and AI Governance

The choice between soft and hard law instruments in international and domestic governance has been theorized extensively. Abbott and Snidal (2000) argue that states choose soft law when they seek to reduce negotiation costs, accommodate uncertainty, and preserve flexibility in rapidly evolving domains. These conditions are paradigmatically present in AI governance: technological change is rapid, regulatory consequences are uncertain, and institutional capacity varies dramatically across jurisdictions. From this perspective, Uzbekistan's adoption of non-binding ethical guidelines is not simply a regulatory deficit — it may reflect a deliberate strategic choice to signal value alignment with international norms while avoiding premature codification in a domain where the technology itself remains in flux.

However, soft law theory also identifies the conditions under which non-binding norms fail to generate behavioral change. Guzman and Meyer (2010) demonstrate that soft law instruments are most effective when they are accompanied by monitoring mechanisms, peer review processes, and reputational incentives. Uzbekistan's Ethical Rules lack all three. There is no independent monitoring body, no systematic review process, and no international reporting obligation. Under these conditions, soft law theory predicts that compliance will be uneven and largely dependent on voluntary

goodwill an insufficient foundation for governing technologies with significant rights implications.

4.2 Legal Transplant Theory

Legal transplant theory, originating with Watson (1993) and subsequently extended by Legrand (1997) and others, examines the processes by which legal norms migrate from one jurisdiction to another. Watson's original opinion that legal transplantation is common, feasible, and often highly effective has been qualified by subsequent scholarship emphasizing that transplanted norms must be adapted to the institutional and cultural context of the receiving jurisdiction to function as intended. Berkowitz, Pistor, and Richard (2003) demonstrate that legal transplants are most effective when the receiving state participates actively in norm elaboration and possesses the institutional infrastructure to support enforcement.

Applied to Uzbekistan's AI governance context, legal transplant theory generates a specific prediction: the adoption of internationally derived ethical principles (from UNESCO, OECD) into Uzbekistan's framework represents a classic transplant scenario. The principles are adopted; the enforcement infrastructure is not. This creates what Berkowitz et al. call a "transplant effect", the formal adoption of norms that remain inert because the institutional conditions for their operation are absent. Overcoming this transplant effect requires not merely importing further principles, but developing the institutional apparatus such as regulatory authorities, certification bodies, enforcement procedures that gives norms their operative force.

4.3 The International Regulatory Landscape

The comparative literature on AI governance identifies several regulatory paradigms that serve as reference points for assessing Uzbekistan's framework. The European Union's Artificial Intelligence Act (2024) represents the most developed hard law instrument, adopting a four-tier risk classification system with prohibited applications, mandatory conformity assessments for high-risk systems, and a structured sanctions regime including fines of up to 7% of global annual turnover. The Act also includes specific provisions for general-purpose AI (GPAI) models, including transparency requirements and systemic risk assessments for the most capable systems.

The United States has pursued a predominantly soft law approach through the NIST AI Risk Management Framework (2023) and a series of executive orders, prioritizing innovation and market dynamics while establishing voluntary standards. China, by contrast, has adopted a prescriptive regulatory model emphasizing mandatory algorithm registration, content governance requirements, and centralized oversight, reflecting a governance philosophy oriented toward state control alongside technological advancement (Astapenko, 2025).

UNESCO's 2021 Recommendations on the Ethics of Artificial Intelligence represent the most comprehensive international soft law instrument, articulating principles of proportionality, safety, fairness, non-discrimination, transparency, accountability, privacy, multi-stakeholder governance, and environmental sustainability. The OECD Principles (2019) similarly establish human-centered values, transparency, and accountability as core governance requirements. Both instruments place human rights at the center of AI regulation, and it is these instruments with which Uzbekistan's framework demonstrates the greatest alignment.

Within the Uzbek academic community, interdisciplinary engagement with AI governance is growing. Amanova (2025) argues that the central regulatory challenge is not the creation of new international instruments but effective implementation of existing ones, including the International Covenant on Civil and Political Rights and the Convention on the Rights of Persons with Disabilities. Iskhakova (2021) identifies the limits of classical hierarchical legal regulation for governing AI and calls for integrated models that combine legal, technical, ethical, and corporate norms. Yokubov (2025) highlights the tension between intellectual property protection and ethical standards in AI-enabled medical research. These contributions establish a national scholarly context within which the present analysis operates.

5. Comparative Analysis

5.1 Overview of Uzbekistan's Regulatory Framework

Uzbekistan's AI governance framework currently comprises two principal instruments. Presidential Resolution No. PP-358 (October 2024) approves the Strategy for the Development of Artificial Intelligence Technologies until 2030, establishing three overarching objectives: the development of a regulatory and legal framework; the creation of technical infrastructure; and the enhancement of public knowledge and human capital in AI. The Strategy identifies priority stages, timelines, and measurable indicators, a framework for ambition, but not a framework for enforcement.

The 2026 Ethical Rules, registered as Order No. 3787 of the Minister of Digital Technologies, establish

substantive principles governing AI development, deployment, and use. The Rules prohibit treating AI-generated decisions as final or autonomous, require human involvement in AI development and operation processes, mandate disclosure of AI system limitations to users, and characterize AI as a supportive tool rather than an autonomous legal entity. These are substantively meaningful commitments that align closely with international consensus on human-centered AI governance.

The Rules are explicitly characterized as soft law within the Uzbek legal system: they do not carry binding force, do not establish sanctions for non-compliance, and function as guiding standards that support self-regulation and professional norm development. This characterization has significant implications for their effectiveness, as analyzed below.

5.2 Cross-Jurisdictional Comparison

Table 1 presents a structured comparison of Uzbekistan's framework against the principal international and comparative reference points across eight governance dimensions identified in the methodology.

Table 1. Comparative Overview of AI Governance Frameworks

Dimension	UNESCO 2021	EU AI Act	US (NIST)	China	Uzbekistan 2026
Legal status	Soft law	Hard law	Soft law	Hard law	Soft law
Risk classification	No	Yes (4 tiers)	Partial	Yes	No
Human oversight	Yes	Yes	Yes	Partial	Yes
Enforcement sanctions	No	Yes (heavy fines)	No	Yes	No
Generative AI coverage	Partial	Yes (GPAI rules)	Partial	Yes	No
Independent regulator	No	Yes (EUAIO)	No	Yes	No
Human rights centrality	Yes	Yes	Partial	Limited	Yes
International alignment	N/A	High	Moderate	Low	Moderate

Source: Author's compilation based on primary regulatory instruments.

The comparative analysis reveals that Uzbekistan's framework occupies a position closest to UNESCO's 2021 Recommendations and the U.S. soft law model in terms of legal status and enforcement philosophy, while falling significantly short of the EU AI Act in terms of regulatory completeness and institutional architecture. The alignment with human rights centrality is genuine and consistent across the Uzbek framework. The divergence from international standards is most pronounced in three dimensions: risk classification, enforcement mechanisms, and coverage of generative AI.

One dimension warrants particular interpretive attention. The absence of a risk classification system in Uzbekistan's framework unlike the EU's four-tier approach or China's sector-specific controls means that all AI applications are governed by the same non-binding principles regardless of their potential for harm. This creates a structural problem: a chatbot used for customer service and a predictive risk scoring algorithm used in criminal justice proceedings are subject to identical (and non-enforceable) governance requirements. This conflation undermines the proportionality principle that

UNESCO itself identifies as foundational to ethical AI governance.

5.3 Characterization of Uzbekistan's Model

On the basis of the comparative analysis, Uzbekistan's current AI governance framework may be characterized as a first-generation soft law hybrid: a system that has successfully internalized the value commitments of international consensus instruments but has not yet developed the procedural, institutional, or enforcement architecture that converts normative commitment into regulatory effectiveness. This characterization is not merely critical, it is analytically useful as it locates Uzbekistan's framework at a recognizable stage in the trajectory of AI regulatory development, and because it suggests a specific reform pathway grounded in the scholarly literature on regulatory maturation.

The characterization as "hybrid" reflects the coexistence of two elements: genuine normative alignment with international standards (human rights centrality, human oversight requirements, and transparency obligations) and structural incompleteness (absence of sanctions, no independent regulator, no risk classification, and no generative AI coverage). The challenge Uzbekistan faces is not to replace its normative commitments which are well-founded but to build the institutional and procedural infrastructure that gives those commitments operative force.

6. Structural Gaps in Uzbekistan's Framework

The comparative analysis and theoretical framework together identify six structural gaps in Uzbekistan's current AI governance architecture. Each gap is analyzed in terms of its nature, its consequences, and its relationship to the conditions for effective implementation identified in the scholarly literature.

6.1 Absence of Risk Classification

Uzbekistan's Ethical Rules apply uniform principles to all AI applications, without distinguishing between systems according to their potential for harm. This contrasts with the EU AI Act's four-tier classification system and with the risk-based frameworks emerging in comparative AI governance scholarship. The consequence of this absence is regulatory disproportionality: low-risk AI applications are over-governed by principles designed for higher-stakes contexts, while genuinely high-risk applications such as predictive policing, credit scoring, medical diagnosis and public benefits allocation receive no additional scrutiny. Soft law theory predicts that uniform, non-differentiated governance instruments generate weak compliance incentives precisely because they fail to focus regulatory attention where the stakes are highest.

6.2 Absence of Enforcement Mechanisms

Neither the 2024 Strategy nor the 2026 Ethical Rules establish sanctions for non-compliance, designate an authority responsible for enforcement, or define formal investigation or adjudication procedures. This is the single most consequential structural gap. Legal transplant theory specifically identifies enforcement infrastructure as the critical variable distinguishing effective transplants from inert ones: principles without procedures remain aspirational. The practical consequence is that Uzbekistan's Ethical Rules function as a statement of values rather than a regulatory instrument where compliance depends entirely on voluntary adoption, and there is no mechanism for identifying, investigating, or remedying violations.

6.3 Absence of Generative AI Regulation

The 2026 Ethical Rules were drafted without explicit provisions addressing large language models, image and audio synthesis technologies, deep fakes, or foundation models. This represents a significant and rapidly widening gap, as generative AI raises distinct governance challenges not addressed by general AI ethics principles: issues of copyright ownership in AI-generated content, liability for AI-generated disinformation, transparency requirements for synthetic media, and systemic risk assessment for highly capable foundation models. The EU AI Act addresses these challenges through its General-Purpose AI provisions; Uzbekistan's framework does not. As generative AI adoption accelerates domestically, the absence of specific governance requirements creates conditions for rights violations and social harms that existing instruments cannot address.

6.4 Absence of Economic and Technical Governance Instruments

Effective AI governance requires not only normative principles but also technical and economic instruments: mandatory conformity assessments, algorithmic audits, certification schemes, and systematic risk evaluation requirements. These instruments operationalize normative principles by creating specific, verifiable obligations that developers and deployers must satisfy. Uzbekistan's framework contains no such instruments. The consequence is that the reliability and safety of AI systems deployed in consequential domains like healthcare, education, public administration cannot be systematically assessed or verified. This gap is particularly significant given Uzbekistan's stated priority

of deploying AI in public services and governance, where the consequences of algorithmic error are most acute.

6.5 Limited International Regulatory Orientation

Uzbekistan's framework does not address cross-border data transfers, the import and export of AI technologies, or harmonization procedures with international certification standards. As Uzbekistan seeks greater integration into regional and global technology markets, this gap creates regulatory uncertainty for both domestic and foreign AI developers operating in the country. It also limits Uzbekistan's participation in international regulatory coordination processes, including the OECD's Global Partnership on AI and UNESCO's implementation mechanisms processes through which soft law instruments acquire their reputational force.

6.6 Institutional Underdevelopment

There is currently no independent AI regulatory authority in Uzbekistan, no AI ethics advisory council, no civil society mechanism for oversight, and no specialized judicial or quasi-judicial body with competence to adjudicate AI-related disputes. Institutional capacity is the foundation of regulatory effectiveness: without dedicated institutions, enforcement is dependent on general legal authorities ill-equipped to address the technical complexity of AI systems. The 2024 Strategy acknowledges the need for institutional development, but no such institutions have yet been established. This institutional void is the structural condition that underpins all five preceding gaps where each gap persists partly because there is no institution with the mandate and capacity to address it.

7. Discussion and Reform Pathways

7.1 Theoretical Interpretation of Findings

The six gaps identified in Section 6 are not independent deficiencies that reflect a coherent pattern consistent with the dynamics described by both soft law theory and legal transplant theory. From a soft law perspective, Uzbekistan's framework exhibits the characteristic features of a first-stage norm adoption cycle: value commitments are internalized, but the monitoring, peer review, and reputational mechanisms that give soft law its behavioral force are absent. From a legal transplant perspective, the framework demonstrates the transplant effect identified by Berkowitz et al. (2003): international norms have been adopted at the level of text, but the institutional conditions for their operation have not been constructed.

Importantly, this pattern does not indicate regulatory failure in any absolute sense. Soft law theory recognizes that non-binding instruments can serve as the foundation for subsequent hard law development, what Shelton (2000) terms the "hardening" of soft norms over time. Uzbekistan's Ethical Rules may plausibly be understood as the first stage of a regulatory trajectory that, if appropriately supported, could develop into a more complete governance architecture. The critical question is whether the conditions for this trajectory are being created. The analysis suggests that they are not yet sufficiently in place.

A counter-argument warrants consideration: one could argue that Uzbekistan's soft law approach is deliberately appropriate for its current stage of development. Thus imposing rigid enforcement mechanisms prematurely would stifle beneficial AI adoption and create compliance costs that the domestic technology sector cannot sustain. This argument has genuine force. The scholarly literature on regulatory sequencing in emerging economies supports the proposition that enforcement capacity should be built incrementally (Pistor et al., 2000). However, this argument is significantly weakened by two observations: first, Uzbekistan's framework contains no roadmap or timeline for transitioning to more robust regulation, suggesting that the soft law choice reflects institutional inertia as much as strategic design; and second, the sectors identified as AI deployment priorities namely: judicial proceedings, public benefits and healthcare are precisely those where deferring enforcement creates the greatest risk of rights violations.

7.2 Proposed Reform Pathways

On the basis of the foregoing analysis, this paper identifies four priority reform pathways that would advance Uzbekistan's framework toward effective implementation of international ethical standards.

First, the introduction of a risk classification system, modeled on but adapted from the EU AI Act, would enable proportionate governance: directing enhanced scrutiny toward high-risk applications while preserving flexibility for low-risk use cases. Adaptation to Uzbekistan's context would require defining risk categories that reflect domestic deployment priorities and existing institutional capacity. This reform does not require new legislation, it could initially be implemented as a supplementary ministerial order elaborating the Ethical Rules.

Second, the establishment of a dedicated AI regulatory authority even in a modest initial form, such as an inter-ministerial committee with an independent technical secretariat would create the institutional foundation for all other reforms. Such a body could assume

responsibility for monitoring compliance with the Ethical Rules, developing technical standards, maintaining a register of high-risk AI deployments, and advising the legislature on the need for statutory regulation. International experience suggests that regulatory authorities are most effective when they combine technical expertise with legal authority and civil society representation.

Third, the development of specific provisions addressing generative AI, including transparency requirements for synthetic media, copyright attribution frameworks for AI-generated content, and risk assessment requirements for large language model deployments in public services would address the most rapidly evolving dimension of the current regulatory gap. Given the pace of generative AI adoption, this reform is urgent.

Fourth, the elaboration of economic and technical governance instruments a mandatory conformity assessments for high-risk AI systems, voluntary certification schemes for other applications, and systematic algorithmic audit requirements for AI deployed in public administration would provide the technical operationalization that converts normative principles into verifiable obligations. These instruments would also support international regulatory alignment, facilitating Uzbekistan's participation in OECD and UNESCO implementation processes.

8. Conclusion

This paper has examined Uzbekistan's emerging AI governance framework through a comparative legal analysis grounded in soft law theory and legal transplant theory. The analysis demonstrates that Uzbekistan has made genuine and significant progress in adopting the value commitments of international AI ethics consensus commitments to human oversight, human rights centrality, transparency, and the characterization of AI as a supporting rather than autonomous tool. These commitments are not merely formal: they reflect serious engagement with the ethical dimensions of AI governance and are consistent with the best practice identified in international instruments.

At the same time, the analysis identifies six structural gaps in risk classification, enforcement mechanisms, generative AI coverage, technical governance instruments, international regulatory orientation, and institutional capacity that prevent these commitments from generating the behavioral change that effective governance requires. The theoretical frameworks applied in this paper explain these gaps not as evidence of regulatory failure, but as the predictable consequence of adopting normative principles in advance of the institutional infrastructure required to give them operative force. This is the transplant effect in operation: the text has been adopted, but the conditions for its functioning have not yet been built.

The reform pathways proposed in Section 7 offer a structured approach to addressing these gaps incrementally, in a manner consistent with Uzbekistan's development priorities and institutional capacity. The sequence matters: institutional development specifically, the creation of a dedicated regulatory authority is the prerequisite for all other reforms, because it provides the organizational foundation for developing technical standards, monitoring compliance, and advising on statutory regulation.

This paper contributes to the emerging literature on AI governance in transitional legal systems in two respects. Substantively, it provides the first systematic comparative analysis of Uzbekistan's AI regulatory framework against international standards, identifying both its genuine achievements and its structural limitations. Theoretically, it demonstrates the utility of combining soft law theory and legal transplant theory as complementary analytical lenses for examining AI governance in jurisdictions navigating the transition from norm adoption to institutional implementation. Future research should examine the conditions under which Uzbekistan's soft law framework generates voluntary compliance behavior, and should assess the comparative trajectories of other Central Asian states facing analogous governance challenges.

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