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# ARTIFICIAL INTELLIGENCE IN LEGAL DRAFTING: A COMPARATIVE ANALYSIS OF UZBEKISTAN AND CHINA

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***Abstract.*** *This article provides a comparative legal analysis of the role of artificial intelligence (AI) in drafting legal documents in Uzbekistan and China. It explores the evolution of AI from a supplementary tool to a central component of digital justice. The study reviews legislative initiatives in both countries, such as Uzbekistan's ethical standards slated for 2026 and China's implementation of the "smart courts" system. Special emphasis is placed on AI's functional capabilities, including automated contract generation, the detection of corruption risks in legislative acts, and the examination of judicial precedents. The research highlights significant differences between the two nations' approaches, particularly in areas such as algorithmic liability and personal data protection. While China emphasizes the comprehensive integration of AI into public governance, Uzbekistan follows the "human-in-the-loop" principle, restricting the legal authority of algorithms. The paper concludes with a call to harmonize standards for algorithmic transparency in order to mitigate risks associated with AI "hallucinations." The findings from this study aim to provide guidance for improving national legislation related to the digital transformation of the legal sector.*

***Keywords:*** *artificial intelligence, legal drafting, legal tech, AI ethics, natural language processing, digitalization of justice, legislation of Uzbekistan, Chinese law, algorithmic accountability*

## Introduction

The rapid advancement of Large Language Models (LLMs) and generative technologies has profoundly reshaped the legal profession, moving it from basic

word processing to sophisticated algorithmic synthesis. In the global pursuit of digital sovereignty, the cases of Uzbekistan and China illustrate two distinctive yet converging approaches to incorporating Artificial Intelligence (AI) into the legal drafting process. This shift operates within foundational constitutional frameworks regarding structural legality and systemic rights (Alexy, 2002). This article delves into how these countries navigate the delicate balance between operational efficiency and the safeguarding of judicial integrity, striking directly at core modern conceptualizations of the rule of law (Bingham, 2010).

China, recognized as a global leader in “Smart Justice,” has embedded AI into its legal system with remarkable depth. From the Supreme People’s Court’s directives on AI implementation to the extensive use of automated contract analysis tools, China’s approach prioritizes standardized workflows and minimizes human error across its expansive jurisdiction (Supreme People’s Court of China, 2022). On the other hand, Uzbekistan is in the midst of a dynamic digital transformation. Guided by the “Digital Uzbekistan — 2030” initiative (Government of Uzbekistan, 2020) and reinforced by legislative measures introduced between 2021 and 2025 (Presidential Decree No. PD-4996, 2021; Law on Artificial Intelligence, 2025), the country is developing a local ecosystem for AI-supported lawmaking and public services. These efforts emphasize the “human-in-the-loop” principle to ensure that local legal intricacies are respected, preserving the foundational legislative structures crucial to state legal continuity (Dicey, 1982). AI’s role in legal drafting, which was once solely reliant on human expertise, now ranges from assisting in contract creation to identifying legislative gaps and ensuring adherence to evolving regulatory standards.

Yet, this shift brings its own set of challenges, including the risk of algorithmic bias, the enigmatic nature of AI decision-making, and occurrences of inaccurate or fabricated references in legal work. This study compares the regulatory landscapes in Tashkent and Beijing, analyzing how AI accelerates documentation processes while scrutinizing mechanisms designed to uphold the principles of justice. It raises critical questions about whether AI serves merely as a clerical assistant or if it is a transformative force capable of redefining the essence of legal authorship in the modern era.

According to M.Sadikov, AI-based drafting should not be viewed as an isolated innovation, but rather as part of the wider digital transformation of legal practice. AI complements other technologies by automating repetitive tasks, enabling smart contracts, and supporting digital dispute resolution mechanisms. Sadikov also emphasizes that successfully implementing legal tech requires institutional reform, legal education, and adapting professional standards. Without these supporting structures, AI tools may remain underutilized or misapplied (Sadikov, 2020).

Ethical and Governance Challenges: Accountability and liability. One of the central challenges is establishing who is responsible for AI-generated legal content. For example, if an AI system produces a flawed clause, liability may fall on the lawyer, the firm, or the software provider. Transparency and explainability: Many AI systems operate as “black boxes”, making it difficult to explain how specific drafting decisions are made. This lack of transparency is problematic in legal contexts where justification and reasoning are essential. Dr. Ammar Younas’ work on AI ethics and responsible AI governance is particularly relevant to the drafting of legal documents, offering frameworks to unpack these complex ethical boundaries (Younas, 2023).

**Methods**

This study employs a multi-dimensional research framework to explore the integration of Artificial Intelligence (AI) into legal drafting processes. The research focuses on a comparative analysis of two distinct systems: the established, state-driven approach

of the People's Republic of China and the rapidly evolving digital legal framework of the Republic of Uzbekistan. To ensure thoroughness and analytical precision, the following methodological approaches have been adopted:

*Doctrinal Legal Analysis*

A systematic exploration of primary legal sources forms the foundation of this research. For China, key documents include the "Interim Measures for the Management of Generative AI Services" (Cyberspace Administration of China, 2023), the Supreme People's Court guidelines on AI use in judicial fields (Supreme People's Court of China, 2022), and emerging regulations on algorithmic governance. In the context of Uzbekistan, the study examines the national strategy "Digital Uzbekistan — 2030" (Government of Uzbekistan, 2020), "Presidential Decree No. PD-4996" (2021), and the "2025 Law On Relations Arising from the Use of Artificial Intelligence" (Law on Artificial Intelligence, 2025). This doctrinal analysis helps pinpoint and interpret normative standards regarding algorithmic transparency and the integrity of legal documentation.

*Comparative Legal Method*

A comparative lens is applied at both macro and micro levels. At the macro level, the research contrasts China's centralized approach to AI governance, exemplified by its "Smart Courts" initiative, with Uzbekistan's focus on economic modernization and public legal services, notably through platforms like LexAI. On the micro level, it delves into procedural nuances, such as implementing the "human-in-the-loop" concept and resolving liability issues for errors in AI-generated legal documentation.

*Content and Functional Analysis*

Functional analysis is used to evaluate the practical applications of AI in legal drafting. This includes a gap analysis aimed at identifying discrepancies between AI-generated outputs and existing legal frameworks for civil and administrative law. The study also conducts technical benchmarking by reviewing official reports and white papers, assessing tools such as China's WeChat-based judicial mini-programs and Uzbekistan's Muxlisa AI platform, which produce standardized legal documents like contracts and petitions.

*Qualitative Policy Analysis*

To understand the motivations behind specific legislative and regulatory developments, qualitative policy analysis scrutinizes policy discourse. This step examines governmental statements, ethical principles—such as Uzbekistan's "2026 Ethical Rules for AI" (Ministry of Justice of Uzbekistan, 2026)—and academic literature from prominent scholars in legal technology. This approach sheds light on how traditional legal drafting practices are transitioning toward new paradigms rooted in AI-driven "prompt engineering."

*Scope and Limitations*

This study focuses specifically on the application of AI in drafting contracts, normative legal acts (NPAs), and judicial documents. Broader applications of AI, such as its use in predictive policing or other non-drafting legal domains, are beyond its scope. The empirical and legal data analyzed are drawn from publicly available databases such as Lex.uz and Chinalawinfo, as well as academic repositories, encompassing developments through the second quarter of 2026.

**Results**

This study's results reveal that the integration of Artificial Intelligence (AI) into the legal drafting frameworks of Uzbekistan and the People's Republic of China marks a significant shift from a purely technical application toward a normatively grounded, ethically conscientious regulatory approach. Drawing on the academic insights provided by Maksudboy Sadikov and Ammar Younas, the study's findings are categorized under three major analytical dimensions:

*Evolution of Legal Technology and Normative Alignments*

The research highlights a transformation of Legal Tech from a supplementary tool into an intrinsic element of modern legal systems. Sadikov's (2020) scholarship illustrates how, in Uzbekistan, AI has been integrated as a quasi-institutional mechanism that facilitates the monitoring and enhancement of legislative quality. Empirical data suggests that the implementation of the "Ethical Rules for AI" (Ministry of Justice of Uzbekistan, 2026) has effectively blurred the lines between non-binding soft law measures and enforceable regulatory requirements. In practice, AI-based tools are actively employed by governmental bodies, particularly within Uzbekistan's Ministry of Justice, to identify inefficiencies in administration and root out corruption-prone clauses during the drafting stage, well before legislative review.

Contrastingly, Younas (2023) emphasizes China's progression beyond using AI for drafting assistance to employing it for adjudicative and interpretative tasks. In China, AI systems have been developed to vet draft legal documents against a vast array of national and subnational laws while aligning them with established judicial precedents (Supreme People's Court of China, 2022). This development has fostered a distinctive model of "algorithmic consistency," marked by extensive systematization, coherence, and standardization in legal outputs.

*Algorithmic Accountability and Liability Frameworks*

A pronounced divergence is observed in how liability for AI-related inaccuracies is regulated in these jurisdictions. Sadikov's exploration of Uzbek legal structures reveals the introduction of administrative liability provisions specifically targeting the misuse of AI, particularly concerning the processing of personal data under emerging enforcement mechanisms. This liability scheme places primary responsibility on the legal professionals employing AI technologies, thereby reinforcing the principle that any errors arising in AI-assisted drafting processes are ultimately attributed to human oversight.

By contrast, Younas identifies a more diffused model of accountability in China, where liability is shared between AI developers and end-users as mandated by central oversight authorities (Cyberspace Administration of China, 2023). Here, the "human-in-the-loop" principle has been institutionalized through mechanisms such as mandatory digital watermarking on AI-generated legal documents. This approach prioritizes process traceability and transparency while avoiding undue concentration of fault on individual practitioners.

*Cross-Cultural Adaptation and Ethical Compliance*

The comparative analysis underscores a measured approach in both Uzbekistan and China concerning the adoption of Western-style AI regulatory frameworks such as the European Union's regulatory framework (EU AI Act, 2024). Instead of direct transplantation, both countries pursue context-sensitive adaptations that align with their respective legal traditions and economic aspirations.

Younas (2023) delineates how China's regulatory design synthesizes Confucian philosophies with socialist legal ideologies, placing emphasis on collective welfare, social harmony, and comprehensive state supervision. Concurrently, Sadikov (2020) identifies Uzbekistan's strategy as centered around economic modernization, technological self-reliance, and fostering an investor-friendly legal ecosystem. In this context, AI-driven legal drafting tools are tailored to enhance institutional efficiency, optimize contractual formalities, and diminish business transaction costs, all while maintaining strict ethical safeguards to ensure responsible technological deployment (Ministry of Justice of Uzbekistan, 2026). In sum, these findings provide valuable insights into the contextual integration of AI innovations into legal systems and

underscore the necessity of balancing technology with ethics in regulatory governance frameworks.

**Discussion**

The findings of this study underscore that integrating Artificial Intelligence (AI) into legal drafting processes in Uzbekistan and the People's Republic of China represents more than just a technological upgrade—it marks a fundamental restructuring of how legal norms are formulated, reviewed, and organized. Both nations exhibit growing incorporation of AI into their legal systems, although their methods and strategic priorities show notable differences.

A key point of agreement between these jurisdictions lies in recognizing AI's ability to enhance the efficiency and consistency of legal drafting. AI tools in both systems streamline the process of creating laws, contracts, and judicial documents by automating labor-intensive tasks such as formatting, cross-referencing, and compliance verification. This automation not only reduces drafting time but also improves the technical precision and overall quality of legislative documents, ensuring compatibility with existing legal standards.

China's advanced implementation of AI in "Smart Courts" showcases the capability of algorithms to manage vast, intricate legal systems (Supreme People's Court of China, 2022). Meanwhile, Uzbekistan's focus is on embedding AI into ministerial operations to achieve administrative efficiency and enhance public service delivery in line with national operational standards (Government of Uzbekistan, 2020; Law on Artificial Intelligence, 2025). That said, the analysis reveals several significant challenges, particularly in terms of regulatory and institutional frameworks.

An especially pivotal concern is accountability for AI-generated errors. Uzbekistan adheres to a more cautious approach, maintaining that legal professionals are entirely responsible for the outputs produced using AI. While this approach bolsters professional accountability and legal certainty, it may also discourage full reliance on AI tools among practitioners. Conversely, China has adopted a shared liability model that allocates responsibility between developers and users (Cyberspace Administration of China, 2023), supported by advanced technologies like traceability systems and digital watermarking. This arrangement promotes transparency but adds complexity when determining accountability in scenarios involving intricate or multi-layered AI applications.

Another key issue is the role of ethical governance in managing AI deployment. Both countries are increasingly adopting ethical standards as a complement to formal law in response to rapid technological innovation (Ministry of Justice of Uzbekistan, 2026). Uzbekistan employs ethical guidelines as transitional norms that bridge innovation with regulation, frequently evolving toward enforceable standards. In China, ethical considerations are more closely aligned with state policy goals, prioritizing social stability, security, and collective benefits. These contrasting approaches highlight deeper variations in legal culture: while Uzbekistan's emphasis lies on fostering market growth and facilitating international cooperation, China prioritizes centralized control and systemic uniformity.

The study also examines the adaptability of external regulatory models—such as the European Union's framework (EU AI Act, 2024)—to these contexts. It finds that neither Uzbekistan nor China directly adopts such foreign frameworks in their entirety. Instead, they selectively tailor external principles to fit their unique domestic legal traditions and policy objectives. This reinforces the idea that governing AI in legal drafting is highly context-specific and unlikely to be universally standardized without accounting for cultural, institutional, and economic differences. One further implication of the increasing use of AI

in legal drafting is a potential paradigm shift—from an exclusively human-driven intellectual exercise to a hybrid process guided by “prompt engineering” and machine-assisted reasoning.

While AI undoubtedly enhances productivity, there is a risk of excessive standardization and diminished doctrinal innovation if such systems are not used judiciously. In conclusion, the experiences of Uzbekistan and China illustrate the significant advantages AI offers in improving efficiency and consistency in legal drafting. However, these benefits come with complex challenges relating to accountability, ethics, and preserving legal integrity. The sustainability of these emergent practices will ultimately hinge on finding an effective balance between fostering innovation and upholding regulatory control.

**Conclusion**

This study highlights the transformative impact of integrating Artificial Intelligence (AI) into legal drafting processes, signaling a significant evolution in modern legal systems, particularly in Uzbekistan and the People’s Republic of China. Once regarded solely as a technical tool, AI is now becoming an integral part of the normative and institutional mechanisms responsible for drafting, verifying, and implementing legal rules. As a result, legal drafting is no longer an exclusively human endeavor but has evolved into a collaborative process where human expertise is complemented by algorithmic support.

A comparative analysis reveals that both countries recognize the strategic potential of AI in improving the efficiency, accessibility, and uniformity of legal drafting. In Uzbekistan, these advancements are driven by goals such as economic modernization, administrative streamlining, and creating a legal environment more conducive to investment (Government of Uzbekistan, 2020). AI tools are actively utilized to optimize legislative workflows, minimize bureaucratic obstructions, and raise the quality of legal acts. Meanwhile, China has adopted a more advanced and systematic approach, embedding AI deeply into its judicial and legislative infrastructures (Supreme People’s Court of China, 2022). This ensures broader cohesion among legal norms while leveraging data-driven mechanisms to enhance judicial processes.

However, the study also highlights the accompanying regulatory and ethical challenges posed by these technological advancements. A notable difference between the two countries lies in their approaches to liability and accountability. Uzbekistan adheres to traditional legal principles, holding human legal professionals solely accountable for AI-assisted outputs in order to uphold established norms of responsibility and ethics (Law on Artificial Intelligence, 2025; Ministry of Justice of Uzbekistan, 2026). By contrast, China employs a distributed accountability model that combines human oversight with technical measures like traceability systems (Cyberspace Administration of China, 2023). These disparities reflect deeper differences in their respective legal traditions, institutional structures, and regulatory philosophies.

Another key insight is that both nations are developing adaptable models for AI governance that align with their domestic priorities, rather than directly importing external regulatory frameworks (EU AI Act, 2024). While international benchmarks offer valuable guidance, wholesale adoption of such standards is neither feasible nor optimal without tailored modifications. Uzbekistan and China instead selectively apply global best practices within the context of local objectives focused on economic growth, social stability, and technological sovereignty.

This research also underscores that the rising reliance on AI is fundamentally altering the nature of legal drafting itself. The emergence of “prompt engineering” as a core professional skill exemplifies how legal practitioners must now integrate traditional doctrinal expertise with a working knowledge of algorithmic tools. While these

advancements hold promise for improving productivity and standardization, they also raise important concerns about excessive dependence on automation, potential algorithmic biases, and the potential decline of critical legal reasoning skills.

Ultimately, the experiences of Uzbekistan and China demonstrate that the effective integration of AI into legal drafting hinges on striking a careful balance between innovation and regulation. While AI has immense potential to enhance the quality and efficiency of legal systems, its adoption must be guided by strong frameworks emphasizing accountability, transparency, and ethical integrity. Future research should explore empirical assessments of AI-enabled drafting outcomes, cross-border standardization efforts, and the broader implications of AI for legal theory and practice.

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