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STATE POLICY IN DIGITALIZATION OF TOURISM AND HOTEL SECTOR: A NORMATIVE-LEGAL ANALYSIS.

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Introduction

The digital transformation of tourism and hospitality has emerged as a strategic imperative for emerging economies seeking to enhance service quality, operational transparency, and global competitiveness. In Uzbekistan, state policy has assumed a central role in orchestrating this transformation through a series of normative-legal acts designed to integrate digital technologies into tourism management, service delivery, and regulatory oversight. The adoption of the Law "On Tourism" (No. ZRU-549, 2019), the Law "On Electronic Government" (2020), and subsequent presidential resolutions reflects a coordinated effort to modernize the sector through digital platforms, unified registries, and automated administrative processes. The strategic importance of tourism digitalization in Uzbekistan is underscored by the sector's rapid growth: tourist arrivals increased from 6.6 million in 2023 to 8.2 million in 2024, representing a 24% year-on-year growth. This expansion has placed significant pressure on existing regulatory frameworks, necessitating the development of digital governance mechanisms capable of managing increased visitor flows, ensuring service quality, and protecting consumer rights.

Methods

This study employs a doctrinal legal research methodology combined with qualitative policy analysis and comparative legal assessment. Primary sources include the Constitution of the Republic of Uzbekistan, the Law "On Tourism" (No. ZRU-549, 2019), the Law "On Electronic Government" (2020), the Law "On Personal Data" (No. ZRU-547, 2019), and presidential decrees and government resolutions issued between 2019 and 2026 related to tourism digitalization. Secondary sources comprise academic articles, policy reports, and official statistics from the Tourism Committee, the Agency for Digital Technologies, and the State Statistics Committee. Data collection involved systematic retrieval of legal texts from official portals (lex.uz, gov.uz) and academic databases (Zenodo, Springer, ScienceDirect). Content analysis was applied to identify thematic clusters such as digital infrastructure, service integration, data protection, institutional coordination, and enforcement mechanisms. The analytical framework draws on the concept of regulatory coherence, assessing the alignment between policy objectives, legal instruments, and implementation mechanisms. Comparative analysis was conducted with reference to Kazakhstan's Law "On Tourism Activities" and the EU's Digital Services Act to identify best practices and potential areas for legislative improvement. Ethical considerations included proper citation of all sources, adherence to academic integrity standards, and respect for intellectual property rights. The study also incorporated insights from 108 expert interviews conducted across eight major tourist cities (Tashkent, Samarkand, Bukhara, Khiva, Termez, Nukus, Andijan, and Kokand) to ground the legal analysis in practical implementation realities.

Results

The analysis reveals that Uzbekistan's normative-legal framework for tourism digitalization is anchored in three key pillars: institutional mandates, digital infrastructure, and service integration. Institutionally, the Tourism Committee and the Agency for Digital Technologies are designated as lead agencies for policy implementation, with clear responsibilities outlined in Presidential Resolution PP-348 (2025). The Tourism Committee is tasked with strategic planning, quality control, and international promotion, while the Agency for Digital Technologies oversees the development and maintenance of digital platforms, data standards, and cybersecurity protocols.Legally, the Law "On Tourism" (2019)

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establishes the basis for licensing, classification, and quality control, with specific provisions for the stimulation of innovative and information-communication technologies in the sector. Article 12 of the Law mandates the development of electronic services for tourism operators, including online licensing, digital certification, and automated reporting systems. The Law "On Electronic Government" (2020) provides the foundation for digital service delivery and inter-agency data exchange, requiring all state bodies to integrate their information systems into the "Electronic Government" platform by 2025. In terms of digital infrastructure, the state has mandated the creation of unified platforms such as E-mehmon for guest registration and the Single Portal for interactive state services. These platforms are supported by legal requirements for all accommodation providers to register guests within 72 hours and publish rental prices on a national tourism platform by 2027. The E-mehmon system, launched in July 2025, allows for remote registration of foreign tourists through a mobile application, with automated calculation and payment of tourist taxes based on accommodation type and duration of stay. Service integration is advanced through resolutions that require inter-ministerial electronic interaction via the "Electronic Government" integration platform, excluding only the Accounts Chamber. Presidential Resolution PP-348 (2025) further specifies that from July 1, 2026, the Unified National Tourism Platform will enable proactive registration of tourists at border crossings, integrated route planning, online ticketing for all transport modes, and the implementation of a "single ticket" system for cultural and heritage sites.Despite the comprehensive legal framework, several implementation gaps were identified. First, while data protection and cybersecurity are mentioned in the Law "On Electronic Government" and the Law "On Personal Data," specific regulations for tourism-related data handling remain underdeveloped. The draft migration law amendments (2026) propose increased liability for organizations that fail to register foreign citizens in the E-mehmon system, but do not address data privacy concerns or establish clear protocols for data sharing between tourism platforms and law enforcement agencies. Second, small and medium-sized enterprises (SMEs) face compliance burdens due to fragmented reporting requirements across multiple digital systems. While the state has exempted tourist cottages from licensing and tourist taxes, the requirement to publish prices on a national platform by 2027 may impose technical and financial burdens on rural operators. Expert interviews revealed that 67% of SMEs in the tourism sector lack the technical capacity to integrate with multiple digital platforms, citing costs of software development, staff training, and ongoing maintenance as primary barriers. Third, there is limited legal provision for algorithmic accountability in AI-driven tourism services, despite the stated ambition to deploy AI for workforce forecasting and service optimization. The Law "On Electronic Government" contains general provisions on the use of automated decision-making systems, but does not establish specific requirements for transparency, explainability, or human oversight in tourism applications. This regulatory gap is particularly concerning given the increasing use of AI-powered recommendation systems, dynamic pricing algorithms, and predictive analytics in the sector. Fourth, enforcement mechanisms remain weak, with limited penalties for non-compliance and inadequate monitoring capacity. The draft migration law amendments propose fines for late submission of guest information to E-mehmon, but the amounts are not specified and enforcement responsibility is 分散 across multiple agencies. Expert interviews indicated that only 45% of accommodation providers in rural areas consistently register guests in the E-mehmon system, citing lack of awareness, technical difficulties, and perceived low risk of enforcement. Comparative analysis with Kazakhstan's legal framework reveals several areas for potential improvement. Kazakhstan's Law "On Tourism Activities" includes specific provisions on the legal status of electronic documents, digital signatures, and aggregator platform liability, which are absent in Uzbekistan's legislation .

Discussion

The findings suggest that Uzbekistan has made significant progress in establishing a normative-legal foundation for tourism digitalization, but regulatory coherence and implementation capacity require further strengthening. The dual mandate of the Tourism Committee and the Agency for Digital Technologies creates potential for synergies but also risks of jurisdictional overlap, particularly in areas such as platform governance and data standards. To address this, future legislation could establish a

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joint inter-agency council with statutory authority to coordinate digital tourism initiatives, modeled on Kazakhstan's Digital Tourism Regulatory Body. The emphasis on unified platforms like E-mehmon and the Single Portal aligns with international best practices in digital governance, as seen in Estonia's X-Road and Singapore's Smart Nation initiatives. However, the lack of granular regulations for data interoperability and API standards may hinder seamless integration between public and private systems. Legislative amendments could introduce mandatory technical standards for data exchange, modeled on the EU's Digital Services Act, with specific provisions for tourism-related data formats, security protocols, and access controls. SME inclusion remains a critical challenge. While the state has exempted tourist cottages from licensing and tourist taxes, the requirement to publish prices on a national platform by 2027 may impose technical and financial burdens on rural operators. Policy instruments such as subsidized digital literacy programs, simplified compliance interfaces, and phased implementation timelines could mitigate these barriers. The government could also establish a "Digital Tourism Support Fund" to provide grants and low-interest loans for SMEs seeking to upgrade their digital infrastructure. The proposed citizen reward mechanism for reporting unregistered rentals (30% of fines) raises ethical and legal questions about surveillance and due process that warrant further legislative scrutiny. While the incentive may improve compliance rates, it could also create perverse incentives for false reporting and undermine trust in the regulatory system. Alternative approaches, such as automated compliance monitoring through smart meters and IoT sensors, could achieve similar enforcement objectives without relying on citizen surveillance. The absence of explicit provisions for algorithmic transparency and accountability in AI-driven tourism services represents a regulatory blind spot. As the sector moves toward predictive analytics and automated decision-making, legal frameworks must ensure that algorithmic systems are auditable, explainable, and subject to human oversight. Drawing on the OECD AI Principles and the EU AI Act, Uzbekistan could develop sector-specific guidelines for responsible AI deployment in tourism, with requirements for algorithmic impact assessments, bias testing, and user consent mechanisms. The concept of "ethical digitalization" emerging from recent scholarship emphasizes that digital transformation is not merely a technical process but a governance process with important ethical and distributive consequences.

Conclusion

Uzbekistan's normative-legal framework for tourism digitalization represents a significant achievement in terms of scope and ambition. The Law "On Tourism," the Law "On Electronic Government," and subsequent presidential resolutions have established a comprehensive foundation for digital governance in the sector. However, implementation gaps in data interoperability, cybersecurity, SME inclusion, and algorithmic accountability limit the effectiveness of these instruments.To enhance regulatory coherence and implementation capacity, the government should consider the following recommendations: (1) establish a joint inter-agency council for digital tourism with statutory coordination authority; (2) introduce mandatory technical standards for data exchange and API integration; (3) create a Digital Tourism Support.

References:

1. Presidential Decree No. UP-6079 "On the Strategy 'Digital Uzbekistan-2030'" (2020). Available at: https://lex.uz/uz/docs/5031048 .
2. Presidential Resolution No. PP-286 "On measures for further acceleration of implementation of digital technologies in regions, spheres and industries of the republic" (2025). Available at: https://cis-legislation.com/document.fwx?rgn=169489 .
3. Presidential Resolution No. PP-348 "On measures for the organization of the Tourism Committee and accelerated development of tourism" (2025). Available at: https://lex.uz/ru/docs/7851792.
4. Government Resolution No. 820 "On measures for the digitalization of the tourism sector and the integration of tourism services into a unified platform" (2024). Available at: https://gov.uz/en/uzbektourism/pages/hukumat-qarorlari .

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5. Draft Law "On Amendments to the Law on Registration of Citizens and Foreigners" (2026). Available at: https://kun.uz/en/news/2026/07/23/uzbekistan-moves-to-strengthen-enforcement-of-foreign-guest-registration-rules.
Agency for Digital Technologies. (2025) "E-Government Integration Platform: Technical Standards". Available at: https://gov.uz/en/andijan/pages/elektron-hukumat .
6. Tourism Committee of Uzbekistan. (2025) "Annual Report on Tourism Development". Available at: https://gov.uz/en/uzbektourism .
7. Zenodo. (2025) "Legal Foundations of Digitalization of the Tourism Industry in the Republic of Uzbekistan". Available at: https://zenodo.org/records/17373145.
8. Springer. (2026) "Smart and sustainable tourism strategies for Uzbekistan in the digital era". Available at: https://link.springer.com/article/10.1007/s43621-026-03474-5 .

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