

Commentary on the Draft Slovak Law Implementing the EU AI Act – Regulatory Sandboxes

On behalf of the AI Chamber, a Poland-based association representing the interests of small and medium-sized enterprises across the CEE region, we are concerned that the draft law does not contain binding provisions establishing regulatory sandboxes where AI companies can test their systems in a safe and supervised environment. Regulatory sandboxes are one of the few measures foreseen in the AI Act that can bring immediate and tangible benefits to the Slovak AI ecosystem and should be introduced without delay.

The urgent creation of regulatory sandboxes has long been a key demand of the AI industry. It is also one of the central proposals in the CEE AI Action Plan presented by the AI Chamber during the Digital Summit in June. Slovakia should establish both domestic sandboxes and at least one joint sandbox in cooperation with other CEE countries, in order to share resources and strengthen the regional ecosystem.

For such sandboxes to be effective, they must be genuinely accessible. Admission should be fast, low-cost, straightforward, and shielded from excessive administrative discretion. The current draft does not guarantee these conditions, risking that sandboxes become ineffective in practice. We therefore recommend that the law explicitly ensures simplified admission procedures and clear criteria.

The European Commission requires all Member States to establish at least one national AI regulatory sandbox by 2 August 2026. The AI Act further prioritises SMEs and start-ups by giving them preferential access to sandboxes and tailored support services. In our view, there is no justification for relying on broad wording, distant deadlines, or the absence of detailed EC guidelines. Slovakia should move ahead without undue delay, taking advantage of the current legislative procedure.

If Slovakia aspires to position itself at the forefront of AI development, regulatory sandboxes must be established as soon as possible. The pace of AI progress is extremely rapid, and waiting two or three years risks creating a technological gap that will be difficult to bridge. Slovakia already has strong foundations - talented specialists, strong research centres, and innovative entrepreneurs at the forefront of AI adoption. What is lacking is decisive, consistent, and well-coordinated governmental action, which the current draft unfortunately does not provide.

We therefore urge that binding provisions on regulatory sandboxes be introduced into the law immediately, rather than postponed. This is an essential step for enabling innovation, supporting SMEs, and ensuring that Slovakia remains competitive in the AI era.