

Mobility Legal Updates

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The Mobility Team at LIN LLC continuously monitors the latest news, legislative updates, and regulatory trends in the automotive industry and issues newsletters to clients on a periodic basis.

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The Mobility Team of LIN LLC monitors technological, legislative, and regulatory developments affecting the automotive and future mobility industries and summarizes the key issues for our clients

This edition examines Euro 7, which extends the reach of European vehicle regulation beyond exhaust emissions to brake and tire emissions and electric-vehicle battery durability, together with the recent measure in the United States authorizing the commercial operation of robotaxis built without a steering wheel.

EU Euro 7 to Apply to New Passenger Cars and Light Commercial Vehicles from November 2026

Type-approval reaches beyond exhaust emissions to brake and tire emissions and electric-vehicle battery durability

[Regulation \(EU\) 2024/1257](#) (Euro 7) applies from November 29, 2026, to new types of passenger cars in category M1¹ and light commercial vehicles in category N1². From that date, the approval authorities of the EU Member States may no longer grant

¹ Passenger cars with not more than eight seating positions in addition to the driver's seating position

² Goods vehicles with a maximum mass not exceeding 3.5 tons

a new type-approval to a vehicle of those categories that fails to satisfy the Euro 7 requirements. From November 29, 2027, vehicles of previously approved types will likewise be barred from registration, sale, and entry into service as new vehicles unless they conform to Euro 7. For buses (M2 and M3), medium- and heavy-duty trucks (N2 and N3) and large trailers (O3 and O4), the Euro 7 standards apply to new type-approvals from May 29, 2028, and to the registration, sale, and entry into service of vehicles of existing types from May 29, 2029.

Unlike the previous regime, which centered on tailpipe emissions from internal combustion engine vehicles, Euro 7 reaches vehicles across a range of powertrains, including electric vehicles, and brings brake particle emissions, tire abrasion, and traction battery durability within its scope. The tire abrasion requirements, however, are subject to a timetable separate from the one generally applicable to vehicles. Measured by reference to newly type-approved tires, they apply from July 1, 2028, to C1 tires for passenger cars, from April 1, 2030, to C2 tires for light commercial vehicles, and from April 1, 2032, to C3 tires for buses and heavy-duty trucks. Battery durability requirements apply to electric vehicles and plug-in hybrids. In the case of electric passenger cars, battery energy capacity must be maintained at not less than 80 percent of its initial value through five years or 100,000 km, whichever comes first, and at not less than 72 percent through eight years or 160,000 km, whichever comes first. The corresponding thresholds for light commercial vehicles are 75 percent and 67 percent.

Vehicle manufacturers exporting to the European Union should, from the second half of 2026, confirm whether the models for which they seek type-approval fall within the scope of Euro 7, and should prepare test data addressing not only exhaust emissions but also brake and tire emissions and battery durability. Component suppliers, for their part, would be well advised to review their supply agreements, in particular the provisions governing specifications, responsibility for testing and certification, notice of design changes, and the allocation of costs in the event of non-compliance. Battery durability warrants particular attention: because the Regulation requires not merely performance at the time a vehicle is placed on the market but the maintenance of that performance over an extended period, battery management systems, thermal

management technology, and degradation data are likely to assume growing significance both in type-approval and in post-approval conformity management.

U.S. National Highway Traffic Safety Administration Authorizes Commercial Operation of Robotaxis Without Steering Wheels

Temporary exemption permits commercial deployment of up to 2,500 vehicles per year

On July 30, 2026, the U.S. National Highway Traffic Safety Administration (“NHTSA”) authorized the commercial deployment of up to 2,500 vehicles per year, for a period of two years, of the robotaxi of Zoox, an Amazon subsidiary, which is built without a steering wheel or pedals (the exemption does not extend to state-level approvals and other procedures). Such a vehicle could not readily obtain certification in the ordinary way, because the prevailing motor vehicle safety standards presuppose operation by a human driver; NHTSA has instead permitted commercial operation by means of a temporary exemption.

In parallel, the relevant regulations were amended so that vehicles manufactured before an exemption is granted may nonetheless fall within the scope of that grant. Autonomous vehicle developers may accordingly pursue the exemption review and vehicle production concurrently rather than sequentially, shortening the interval between approval and the commencement of actual service. NHTSA has at the same time begun work on performance standards for autonomous vehicles, but intends, until those standards are complete, to permit commercial operation through temporary exemptions while managing safety.

This development merits attention because the United States has elected, rather than deferring commercialization until uniform safety standards for autonomous vehicles are in place, to allow a defined volume of vehicles to operate first while those standards are given concrete form. If Korea is likewise to reach the commercialization of robotaxis without a steering wheel and of purpose-built vehicles, a framework will be needed that extends the special exceptions to motor vehicle safety standards and the temporary operating permit regime beyond the demonstration stage and through to commercial operation.

LIN LLC has extensive advisory and litigation experience across the mobility sector, ranging from automotive regulatory compliance and administrative proceedings to patent and trade secret disputes. The firm's Mobility Team brings together attorneys and professionals with deep knowledge of, and hands-on experience in, the automotive and future mobility industries.

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