



Mobility Legal Updates

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The Mobility Team at LIN LLC continuously monitors the latest news, legislative developments, and regulatory trends in the automotive industry and periodically shares these updates with our clients.

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In August, the National Assembly passed an amendment to the Trucking Transport Business Act that introduces a registration regime for freight transport platform businesses—which until now have operated without any specific statutory basis—and establishes compliance obligations for platform operators. That same month, the Ministry of Climate, Energy and Environment issued a notice of proposed amendments to subordinate legislation that would bring automobile and secondary battery manufacturing within the scope of the integrated environmental permit system. In this issue, we outline the principal features of both regimes and the key considerations for companies within their scope.

Registration Regime Introduced for Freight Transport Platforms; New Compliance Obligations Imposed on Platform Operators

[National Assembly Passes, and Government Promulgates, Amendment to the Trucking Transport Business Act \(Bill No. 2215469\)](#)

On August 26, 2026, the National Assembly passed a partial amendment to the Trucking Transport Business Act establishing a statutory basis for the freight transport platform business. The amended Act (the “Amended Act”) was promulgated on September 22, 2026 (Act No. 21970) and is scheduled to take effect on September 23, 2027.

In recent years, platform-based transactions that use smart devices to connect shippers directly with trucking business operators and truck owner-operators have proliferated in the freight transport market. Until now, however, freight transport platforms have operated as effectively unregulated businesses, without any clear statutory basis. Truck owner-operators have repeatedly suffered harm in platform-based transactions—including nonpayment of freight charges and unlawful multi-tier subcontracting—yet platform operators bore no legal duty to police such conduct, prompting criticism that user protections were inadequate. The amendment seeks to bring freight transport platforms within the regulatory framework and to hold platform operators accountable for oversight, thereby strengthening protections for truck owner-operators and other platform users.

To that end, the Amended Act defines a “truck transport platform business” as a business that provides information relating to freight transport contracts to an unspecified number of member users through an application used on mobile devices, websites, or similar media, and designates it as a category of trucking transport business (Article 2, subparagraphs 2 and 8). Accordingly, any person seeking to operate a transport platform business must prepare a business plan and register with the Minister of Land, Infrastructure and Transport (Article 34-5(1)). To register, an applicant must have in place, among other things, a platform equipped with freight information processing capabilities and security safeguards; a business plan covering matters such as usage fees and an operating plan for ancillary services; and office premises (Article 34-5(3)). Operating the business without registration is punishable by imprisonment of up to two years or a fine of up to KRW 20 million (Article 67, subparagraph 6-2). Operators already running a

platform as of the effective date will be deemed registered but must complete registration within three months thereafter (Addenda, Article 3).

The Amended Act also sets out specific obligations for platform operators. First, operators are prohibited from brokering, or acting as agents for, transport contracts for compensation without a freight forwarding business license, and from charging a brokerage fee on each transport contract (Article 34-7(1) and (2)). In addition, platform operators must notify member users in advance so as to prevent unlawful conduct on the platform—such as demands for overloading, fraudulent load listings, and unlicensed forwarding—report any such conduct to the Minister of Land, Infrastructure and Transport once identified, and restrict platform access for member users found to have committed violations (Article 34-7(4) and (5)). Because the Amended Act defines platform member users to include shippers, trucking business operators, freight forwarders, and entrusted owner-operators (Article 2, subparagraph 9), manufacturers that tender freight through platforms may, as member users, also be subject to platform notices and access restrictions. Platform operators that violate these obligations face an administrative fine of up to KRW 5 million, or revocation of registration or suspension of business for up to six months (Articles 70(2)(14-5) and 34-10(1)(6)).

Before the Amended Act takes effect on September 23, 2027, platform operators should satisfy the registration requirements, review their fee structures in light of the prohibition on per-transaction brokerage fees, and update their procedures for filing usage fees and terms and conditions, and for notifying member users of prohibited conduct and reporting violations. In particular, operators that broker or act as agents for transport contracts in addition to operating a platform should review their business structure, including whether they hold a freight forwarding business license. Moreover, because much of the detail regarding registration requirements and compliance obligations has been delegated to subordinate legislation, such as Ordinances of the Ministry of Land, Infrastructure and

Transport, companies should closely monitor the development of that subordinate legislation.

Move to Bring Automobile and Secondary Battery Manufacturing Under Integrated Environmental Permitting from 2029

Notice of Proposed Amendments to the Enforcement Decree and Enforcement Rule of the Act on the Integrated Control of Pollutant-Discharging Facilities

On August 26, 2026, the Ministry of Climate, Energy and Environment issued a notice of proposed partial amendments to the Enforcement Decree and Enforcement Rule of the Act on the Integrated Control of Pollutant-Discharging Facilities (the “Pollutant-Discharging Facilities Act”) that would add seven industries, including automobiles and secondary batteries, to the scope of integrated permitting. Under the proposed amendments, the manufacture of motor vehicles and engines for motor vehicles, as well as the manufacture of primary and secondary batteries, would become subject to integrated permitting beginning January 1, 2029 (Proposed Enforcement Decree, Annex 1, subparagraphs 26 and 27).

The integrated permit system, in effect since 2017, allows sites with significant pollutant discharges to obtain a single site-level permit in lieu of up to ten separate environmental permits and approvals covering air emissions, water discharges, waste, and other media. An operator seeking an integrated permit must submit an integrated environmental management plan that includes, among other things, an analysis of the impact of its pollutant discharges on the surrounding environment (Pollutant-Discharging Facilities Act, Article 6(4)). Site-specific permitted emission limits are then set on the basis of that plan, and best available techniques (BAT)¹ suited to the relevant industry and site conditions are applied. Even after obtaining a permit, operators must submit an annual report on the

¹ Management techniques that effectively reduce pollutant emissions while being technically and economically feasible.

operation and management of their discharging facilities, and sites meeting certain thresholds must appoint an integrated environmental manager (Pollutant-Discharging Facilities Act, Articles 21-2 and 33).

In the automotive sector, auto parts manufacturing has been subject to integrated permitting since January 1, 2021. Finished vehicle and engine manufacturing, however, were not among the covered industries and have instead required separate permits under individual statutes governing air quality, water quality, and other media. Citing parity among comparable industries and shifts in industrial structure, among other considerations, the Ministry of Climate, Energy and Environment decided to newly add seven industries²—including automobiles and secondary batteries—that had previously been excluded despite their considerable environmental impact. Coverage, however, is determined on a site-by-site basis rather than at the company level, and among sites in the covered industries, only those that generate 20 tons or more of air pollutants per year or discharge 700 m³ or more of wastewater per day are subject to the regime (Pollutant-Discharging Facilities Act, Article 6(1)).

Existing sites would be granted a four-year grace period from the applicable effective date to obtain a permit, and sites may voluntarily apply for an integrated permit even before that date (current Enforcement Decree, Annex 1, Note 6). In addition, to ease post-permit compliance burdens, the proposed Enforcement Rule amendment would allow the periodic inspection cycle—currently one to three years—to be extended to up to five years in certain cases (Proposed Enforcement Rule, Article 31). Such an extension would be available where an integrated permit agent submits, as part of the annual report, the results of a self-inspection of compliance with the permitted emission limits and permit

² Manufacture of non-alcoholic beverages and ice (KSIC 112); manufacture of vegetable and animal oils and fats, and dairy products (KSIC 104); manufacture of other food products (KSIC 108); manufacture of motor vehicles and engines for motor vehicles (KSIC 301); manufacture of primary and secondary batteries (KSIC 282); manufacture of flat glass (KSIC 23111), within manufacture of glass and glass products (KSIC 231); and manufacture of rubber products (KSIC 221).

conditions, and the regional environmental office evaluates those results and recognizes them as excellent.

If the amendments are adopted as proposed, finished vehicle, engine, and battery manufacturing sites of a certain scale or larger will be required to convert the environmental permits and approvals they have held under separate statutes—covering air quality, water quality, and other media—into an integrated permit. Because coverage turns on the volume of air pollutants generated rather than emitted (Pollutant-Discharging Facilities Act, Article 6(1)), companies should first check whether each site is covered, even if the volume actually emitted after passing through pollution prevention facilities is low. For covered sites, preparing an integrated environmental management plan—including the requisite emissions impact analysis—is a time-consuming undertaking, and failure to obtain a permit within the grace period may expose the site to an order suspending the use of its discharging facilities, among other measures (Pollutant-Discharging Facilities Act, Article 22(3)). Companies should therefore document, on a site-by-site basis, the current status of their existing individual permits and approvals, and of their discharging facilities well in advance and assemble the materials needed to prepare the plan. In particular, companies planning to build new plants or undertake major capacity expansions from 2029 onward would be well advised to factor the integrated permit or permit modification process into their project timelines. Finally, because the effective dates were set in light of the state of preparatory work, including the development of industry-specific BAT reference documents, companies should also monitor progress in preparing the reference documents for the newly covered industries.

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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