

Mobility Legal Updates

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LIN's Mobility Team monitors legal and regulatory trends in the automotive industry and periodically sends newsletters to our clients.

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Discussions are gaining momentum regarding the establishment of performance evaluation and remanufacturing safety management systems for end-of-life electric vehicle batteries. Concurrently, efforts to refine data and high-precision road map infrastructure are intensifying to support the commercialization of autonomous driving. Stakeholders should proactively reassess their business models and internal compliance frameworks.

Through this newsletter, LIN Mobility Team introduces key legislative developments from December 2025: ΔPartial Amendment to the Act on the Promotion of and Support for Commercialization of Autonomous Vehicles (Exceptions for visual data collection/usage and high-precision road map construction/updates) ΔPartial Amendment to the Motor Vehicle Management Act (Performance evaluation of end-of-life batteries and safety management for remanufactured batteries). Please be advised that the following two legislative items are "draft bills" currently referred to the plenary session of the National Assembly and have not yet been promulgated or enforced; their content may change during the deliberation at the plenary session and subsequent transfer to the government for promulgation.

Partial Amendment to the Act on the Promotion of and Support for Commercialization of Autonomous Vehicles (Alternative Bill) (Bill No. 2215411)

Exceptions for Visual Data Collection/Usage Based on Temporary Operation Permits and Mandatory High-Precision Road Map Construction/Updates

On December 19, 2025, the Land, Infrastructure and Transport Committee of the National Assembly passed this partial amendment as an alternative bill and referred it to the plenary session for deliberation. This alternative bill introduces exceptions allowing those with temporary operation permits to record and collect visual data containing specific personal information for the purpose of improving the performance and safety of autonomous driving systems, and to use such data without anonymization or pseudonymization (Draft Article 20-2(1)).

However, it also prohibits the use of data for unauthorized purposes and imposes obligations to implement protective measures and ensure data destruction with accompanying penalties or administrative fines for violations. Furthermore, it establishes a new obligation to construct high-precision road maps and periodically update them to reflect road changes (Draft Articles 20-2, 22). Businesses need to review their visual data processing, subcontracted management, and data governance and security systems.

This alternative bill is understood as an effort to alleviate the regulatory burden of utilizing autonomous driving data by codifying exceptions that allow the use of visual data containing personal information without anonymization or pseudonymization, *provided* it is for performance and safety enhancement during operation under temporary permits. Nevertheless, as the bill also introduces prohibitions on unauthorized use, protection and destruction obligations, and sanctions, businesses must refine their standards for access authority, retention periods, destruction, and subcontracted management of original video data to ensure the data is utilized within the scope of these exceptions.

Partial Amendment to the Motor Vehicle Management Act (Alternative Bill) (Bill No. 2215410)

Introduction of Performance Evaluation for End-of-Life Batteries and Establishment of Registration/Safety Inspection Systems for Remanufactured Batteries

On December 18, 2025, the Legislation and Judiciary Committee of the National Assembly approved the Partial Amendment to the Motor Vehicle Management Act as an alternative bill and referred it to the plenary session for deliberation. This alternative bill aims to establish a comprehensive management framework that links the post-usage stage of batteries installed in electric vehicles, etc. to remanufacturing, reuse, or recycling through performance evaluations, while strengthening safety management during the distribution of vehicles equipped with remanufactured batteries.

Specifically, the bill introduces new definitions for "End-of-life Battery" and "Remanufactured Battery" (Draft Article 2 Subparagraphs 1-8 and 1-9) and establishes a performance evaluation system for end-of-life batteries (Draft Article 35-13). It also sets operating standards, *inter alia*, for the designation of performance evaluation agencies and revocation thereof (Draft Article 35-14). Furthermore, the bill includes the mandatory registration of entities intending to manufacture or assemble remanufactured batteries using end-of-life batteries (Draft Article 35-15), mandatory safety inspections prior to the distribution of vehicles equipped with remanufactured batteries (Draft Article 35-16), and obligations to comply with facility and equipment standards for the storage and transportation of end-of-life batteries (Draft Article 35-17).

In summary, this alternative bill introduces an integrated evaluation, registration, inspection, and history management system covering the entire lifecycle from "post-usage" to the "distribution of vehicles equipped with remanufactured batteries." Consequently, businesses involved in battery production, finished vehicle manufacturing, distribution, and remanufacturing may be required to respond to these new procedural requirements.

In addition, a new legal basis is established to request battery performance data and other relevant information from battery businesses to the extent necessary for performance evaluations and safety inspections (Draft Article 35-19). Accordingly, it is essential to refine the scope and methods of information disclosure, ensure the protection of trade secrets, and reorganize liability allocation with partners.

Currently, these alternative bills are pending deliberation at the plenary session following their referral, and their specific content and enforcement dates will be finalized during the deliberation at the plenary session and subsequent transfer to the government for promulgation. Related businesses are advised to review their response processes focusing on core issues such as pre-distribution safety inspections, and history and data management systems.

LIN LLC has extensive experience in providing advisory and litigation services in the mobility industry, particularly in areas such as administrative regulations, and patent and trade secret disputes related to motor vehicles. Our Mobility Team consists of attorneys and experts with a distinctive interest and passion for automobiles.

Should you wish to learn more about this newsletter or have any other inquiries, please do not hesitate to contact **LIN's Mobility Team**.

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