

GIBSON DUNN

Corporate Update

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Regulating Autonomous Vehicles in Saudi Arabia

By establishing a comprehensive framework addressing product safety, performance standards, and regulatory oversight, the Regulations meaningfully enhance legal certainty for market participants.

Background

Saudi Arabia has taken material steps towards establishing the regulatory framework for autonomous vehicles as part of its National Transport and Logistics Strategy. These steps include the issuance of: (i) the technical regulations for autonomous vehicles by the Saudi Standards, Metrology and Quality Organization (**SASO**) (the **Regulations**); and (ii) Volume 801 of the Saudi Highway Code (**SHC 801**) by the General Authority for Roads (**RGA**).

The Regulations, together with SHC 801, form the core regulatory framework governing on-road use of fully and partially autonomous vehicles. The Regulations set out the technical requirements applicable to autonomous vehicles in Saudi Arabia and define the roles and responsibilities of the relevant market participants, including economic operators, while SHC 801 sets the requirements relating to infrastructure readiness and safety oversight.

Though the Regulations are due to enter into force in April 2026, the Transport General Authority (**TGA**) has already applied the regulatory framework through controlled pilot deployment. To obtain authorization to deploy autonomous vehicles, operators were required to demonstrate

compliance with the requirements of the Regulations and SHC 801, including participation in a pilot and regulatory sandbox program conducted under TGA oversight.

The sandbox program involved supervised testing, self-assessments, and technology validation designed to ensure that deployed vehicles meet applicable safety and performance standards. This approach included the issuance of the first autonomous driving permit to WeRide and conducting pilot operations in partnership with Uber and Ai Driver. In late October of last year, the TGA reported the successful completion of the pilot involving more than 1,000 users, providing a meaningful point of reference as the Regulations approach formal entry into force.

Scope of Application

The Regulations apply to autonomous vehicles and to economic operators involved in the placing of such vehicles on the market, including: manufacturers, authorized representatives, importers and distributors. In particular, the Regulations apply to vehicles equipped with high and full driving automation (SAE levels 4 and 5) for both passenger and goods vehicles (categories M and N). The Regulations equally apply to vehicles that are locally manufactured or imported into the Kingdom. Such vehicles include: (i) fully autonomous vehicles, and dual mode vehicles designed for transport of passengers and goods; (ii) fully autonomous hub-to-hub vehicles; and (iii) vehicles with autonomous parking features.

Obligations on Economic Operators

The Regulations establish general obligations applicable to all economic operators, alongside role-specific requirements that apply to manufacturers, importers, distributors and authorized representatives who may be appointed by manufacturers established outside of the Kingdom to support compliance and liaison activities. The general obligations include: (i) ensuring compliance with the requirements of the Regulations; (ii) cooperating with competent authorities, including by providing documentation and information upon request; (iii) ensuring that transportation and storage conditions do not compromise product safety or conformity; and (iv) where non-compliance or a safety risk is identified, acting promptly to implement appropriate corrective measures, which may include withdrawing or recalling products.

Beyond the baseline obligations applicable to all economic operators, the Regulations impose specific obligations that vary by the role performed, including obligations applicable to manufacturers, importers, distributors, and authorized representatives.

- **Manufacturers** are responsible for complying with technical requirements, conducting conformity assessments and issuing declarations of conformity, as well as maintaining ongoing compliance for serial production. They must also manage product risks through testing, handling complaints, and taking corrective actions when necessary. Additionally, manufacturers must provide product identification, including safety and usage instructions in Arabic, supply required documentation to authorities upon request, and cooperate with authorities to address any risks associated with the products.
- **Importers** must ensure that the vehicle placed on the market has undergone the applicable assessment procedures, that handling and storage conditions do not adversely affect product conformity, and that appropriate corrective measures are taken where the vehicle does not comply with applicable requirement or presents a safety risk.

- **Distributors** are required to verify that products placed on the market conform with the applicable requirements under the Regulations. They must also ensure that, while the products are under their responsibility, storage and transport conditions do not adversely affect product conformity.
- **Authorized Representatives** must carry out the tasks specified in the authorization granted by the manufacturer, however core manufacturer responsibilities such as ensuring soundness of the product from a design and manufacturing perspective remain with the manufacturer.

Vehicle-level Requirements and Exceptions

The Regulations introduce vehicle-level requirements addressing safety, operational and environmental requirements. Article (10) of the Regulations sets out the essential safety requirements intended to ensure that the vehicles do not pose unreasonable risks to users, property, or the environment. These requirements are further elaborated through three annexes, which address testing and operational requirements and provide for limited technical exceptions applicable to certain categories of autonomous vehicles.

Annex (1) specifies the safety, operational, and environmental criteria that the Autonomous Driving System (**ADS**) must satisfy. It also sets out a series of tests through which compliance with essential safety requirements is demonstrated. These tests include track testing, consisting of physical tests conducted either on-road or at designated facilities to simulate the conditions of the design domain as defined by the manufacturer, and real-world testing, which involves testing on public roads in accordance with local traffic regulations.

Annex (2) introduces performance requirements that specify the functional capabilities an ADS must demonstrate, including sensing and perception, decision-making, and vehicle control across both normal and critical driving scenarios. These requirements also address system behavior in the event of faults or unexpected conditions, with a view to ensuring that the ADS can respond safely and maintain acceptable risk levels.

Annex (3) provides for a limited set of technical exceptions, under which certain requirements may be waived for particular types of autonomous vehicles, subject to the conditions set out in the Regulations.

Conclusion

The introduction of the Regulations marks an important milestone in the Kingdom's approach to emerging mobility technologies. By establishing a comprehensive framework addressing product safety, performance standards, and regulatory oversight, the Regulations meaningfully enhance legal certainty for market participants. From an industry perspective, the Regulations are expected to catalyze investment and innovation, while supporting the development infrastructure and supply chains. Taken together, these developments are perceived as constructive steps toward advancing the Kingdom's broader Vision 2030 objectives.

The following Gibson Dunn lawyers prepared this update and are available to assist with any questions you may have regarding these developments.

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