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A Global Framework for Driverless Cars: UNECE Adopts First ADS Regulation

The UNECE World Forum for Harmonisation of Vehicle Regulations (WP.29), a permanent working group within the United Nations Economic Commission for Europe (UNECE) and primary global regulatory body responsible for establishing standardised safety, environmental, and performance requirements for motor vehicles, recently met in Geneva and voted to adopt the world's first international regulatory framework for fully autonomous Automated Driving Systems (ADS) alongside an accompanying Global Technical Regulation. The regulations are expected to take full effect at the beginning of 2027.

The promise of fully autonomous vehicles (AV) has long since preceded the regulatory frameworks needed to support their safe introduction, but this vote represents a significant step towards changing this reality by bringing countries, manufacturers, and technology companies together to introduce consistent global standards for AV safety regulation.

While questions still exist for insurance and legal professionals working across motor, product liability, and technology risk, for the first time, there will be a single, internationally recognised safety baseline against which fully driverless vehicles can be designed, tested, and approved. This baseline will dictate how these professionals will underwrite risk, establish liability, and litigate accidents across global markets.

What has been adopted

The new framework was approved through two parallel votes so it could be adopted into two separate UN treaties, reflecting intricacies of international vehicle regulation. Over half of the 62 state parties to a 1958 Agreement took part and unanimously agreed to implement the new rules, which will accelerate international scaling by broadly enabling AVs produced in one signatory country to be sold in another.

However, contracting countries recognising vehicle type approvals granted by another country do so with the caveat that they comply with the relevant WP.29 regulations, without requiring further technical assessment. This reciprocal recognition relates specifically to vehicle type approval rather than to where the vehicle was manufactured or to broader national regulatory frameworks and helps to promote greater international consistency while reducing duplicate approval processes.

Furthermore, the agreement does not replace or override domestic regulatory requirements, such as those under the UK's Automated Vehicles Act 2024 (AVA), which also includes separate authorisation processes to permit driverless operation on UK roads, ongoing safety monitoring, enforcement powers, and independent incident investigations. While WP.29 provides the technical vehicle standards, manufacturers need to comply with additional UK regulatory requirements stipulated in the AVA, even where their vehicles have already obtained UN-recognised type approval elsewhere.

Separately, 13 countries, including the US, Canada, and China, which are not parties to the 1958 Agreement, voted to add the same set of regulations to a 1998 Agreement, a parallel instrument that sets shared technical standards, but doesn’t carry the same automatic cross-border sales recognition. Between the two votes, the framework now has the backing of the world's major automotive markets, including the UK, EU, Japan, US, Canada, and China.

The new UN Regulation is built around a safety-case approach and a safety management system, designed to strengthen trust among governments, industry, and the public by ensuring that automated systems meet vigorous, outcome-focused safety standards. Rather than prescribing a rigid technical specification for the engineering of an ADS, the regulation sets outcome-based requirements and asks manufacturers to provide evidence to demonstrate compliance.

Critically, manufacturers will be required to integrate audited safety management systems that span the entire lifecycle of an ADS, from design through to decommissioning, and to carry out continuous performance monitoring so that regulators can assess how vehicles behave once they are in service. Vehicles must also be fitted with data storage systems that record relevant safety information to support oversight and any subsequent investigation, which will be of significant interest to professionals tasked with collecting evidence in road traffic claims.

The baseline performance standards align with those already used in the UK, with UNECE stating that an ADS must perform at least as well as a "*competent and careful human driver*," reflecting they will be responsible for steering, accelerating, braking, and signalling. Manufacturers seeking approval will need to demonstrate robust design, validation, and compliance with traffic rules using simulation, track testing, and real-world trials. Any environments used for virtual testing will also be subject to strict credibility criteria.

The headline regulation adopted by WP.29 was accompanied by several consequential amendments, with approximately 90 existing UN vehicle regulations amended to clarify that they remain applicable to vehicles fitted with an ADS, including vehicles without traditional driver controls. This is a significant part of the regulatory update, as it ensures continuity across the existing body of vehicle safety law without compromising ongoing ADS innovation.

A Significant Milestone

To prevent the fragmentation that has characterised national approaches to AV regulation in the past, the UNECE framework aims to provide clarity for manufacturers, confidence for consumers, and a pathway to the safe, large-scale deployment of AVs across multiple markets. Richard Damm, Chair of the UNECE Working Party on Automated/Autonomous and Connected Vehicles (GRVA), which led the technical work, was clear in his assessment of the historic adoption of the new regulatory framework: "*This is a really big step. It's very important, as automation will be one of the future technologies we will see on the road*."

The commercial landscape also highlights its importance; according to the International Energy Agency, private robotaxi fleets in China and the US more than doubled in 2025 to reach around 8,000 vehicles across more than two dozen major cities. Forecasts suggest these numbers could grow by between 700,000 and 3 million robotaxis operating across 40 to 80 major cities by 2035. Replacing a myriad of national schemes with a single harmonised approval standard is intended to allow that growth without forcing manufacturers to re-engineer and re-certify vehicles market by market.

The UK dimension

In the UK, the AVA already provides the legal framework for deploying self-driving vehicles on Great Britain's roads and builds on the Automated and Electric Vehicles Act 2018 (AEVA), which established the principle that motor insurers covering an AV bear primary civil liability for accidents caused by it when driving itself. Under AEVA, an insurer that meets a claim retains the right to pursue secondary recovery against a manufacturer or other responsible party, a structure which is expected to continue once the AVA's liability provisions are fully introduced.

The 2024 Act introduces changes to road law to transition legal responsibility away from drivers and onto the organisations developing and operating vehicle technology. The Authorised Self-Driving Entity (ASDE), typically the OEM or software developer, adopts

responsibility for how a vehicle drives itself, and the No-User-in-Charge (NUiC), which are licensed operators overseeing journeys where no human is inside the vehicle.

Where an authorised automated feature is engaged, the User-in-Charge (UiC) in the vehicle is generally granted immunity from criminal and civil liability for the vehicle's driving, unless a transition demand is issued, where the system requests human control within a defined period due to certain circumstances. UK guidance will continue to draw heavily on UNECE regulations, including the cybersecurity and software update requirements mandated by UN Regulations 155 and 156.

The UNECE regulation lays the international technical and safety foundations, while the AVA governs the domestic areas of authorisation, liability allocation, licensing of operators, and access to vehicle data for claims and investigation purposes. This coming together will likely be welcomed by UK insurers given the considerable effort The Association of British Insurers (ABI) and Thatcham Research have already invested in defining data requirements for AV claims, work that has fed directly into the developing UNECE regulations and into the technical detail still to be finalised under the main domestic regulations expected to follow the AVA.

Practical Implications for Insurers and Law Firms

In principle, the emphasis on continuous data recording and lifecycle safety monitoring should make gathering evidence more structured in conventional road traffic claims. However, access to that data and the terms on which manufacturers and operators must share it remain an evolving issue in many jurisdictions.

Additionally, the shift of primary responsibility towards ASDEs and manufacturers will continue to reshape the nature of motor claims, and perhaps push more disputes towards product liability, cybersecurity and analysis of software failure. Firms advising clients involved in cross-border deployment should note that UNECE serves as an accepted international baseline and does not remove the need to satisfy domestic regulatory regimes.

How liability will be distributed between ASDEs, operators, and manufacturers in contested cases, how courts will approach causation where an ADS's decision-making is unclear, and how quickly the robotaxi and NUiC markets will scale globally are all questions that will remain after the UNECE framework is adopted.

However, a fragmented, market-by-market approval approach amplifies uncertainty, cost, and risk, and a new global standard lays the groundwork for how regulatory details in the UK are defined and how they develop alongside each other warrants close attention over the coming year.

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