



Legal bulletin: Dubai Autonomous Vehicle (AV) Law and recent regulatory developments

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In brief

Administrative Decision No. 939 of 2025 (“**Decision 939**”) significantly advances Dubai’s autonomous vehicle (“**AV**”) regulatory framework by operationalising Dubai Law No. 9 of 2023 (the “**Primary AV Law**”). Where the Primary AV Law established the architecture of regulation, Decision 939 translates that framework into concrete, evidence-based and continuously monitored operator obligations.

This bulletin highlights (i) what Decision 939 adds in practical terms, (ii) what it signals about the Roads and Transport Authority (“**RTA**”) regulatory direction, and (iii) the gaps that still require active engagement and careful compliance design for anyone seeking to operate AVs in Dubai.

Executive Summary:

- 1. From architecture to execution:** Decision 939 converts the Dubai Primary AV Law’s high-level framework into an Operator “playbook”, with clearer expectations around testing, documentation, performance monitoring and incident response.
- 2. Evidence becomes the compliance currency:** Operators are expected to maintain an evidence-backed safety dossier (certifications, testing history, Dubai-relevant operational testing, and closure of observations), not just meet abstract “standards”.
- 3. Compliance is dynamic and data-driven:** Operators must continuously meet performance standards published by the RTA and run secure, integrity-protected operational data system – treating data as regulatory evidence.
- 4. Key elements remain modular:** The permitted “Activities”, detailed inspection/licensing procedures, and fuller data governance mechanics remain largely deferred to Executive Council instruments, RTA manuals and website standards, creating a “live” compliance environment.

In detail

1. The Primary AV Law: the core regulatory structure

The Primary AV Law establishes a deliberate two-gate regulatory model. Firstly, no AV may travel on a public road without being licensed by the RTA. Secondly, no person may conduct an AV “Activity” (being any activity involving the use of AVs) without holding an RTA permit.

This split separates vehicle readiness (technical and roadworthiness approval) from business model authorisation (the Activity being conducted). It reflects a regulatory design focused on ongoing supervision, rather than a one-off approval event.

Regulatory responsibility is divided between the licensed operator (the “**Operator**”) and the authorised agent (the “**Agent**”). The Operator is the entity approved by the RTA to conduct the permitted AV Activity and is responsible for day-to-day operations and compliance with safety, regulatory and liability obligations. The Agent sits on the supply and technical side as the locally authorised distributor through which AVs are maintained and technically supported, without displacing the Operator’s primary accountability to the RTA.

Civil liability under the Primary AV Law is placed squarely on the Operator, who is the front-line risk bearer for damage or harm caused by an AV, leaving it for the Operator to reallocate risks against responsible third parties (for example, the technology provider) at a contractual level or through insurance.

2. Decision 939: operationalising the framework

Decision 939 requires Operators to implement a compliance programme grounded in evidence, system integrity and ongoing performance monitoring, moving beyond abstract standards to demonstrable operational readiness.

a. Alignment with the updated federal traffic framework

Decision 939 expressly references Federal Decree-Law No. 14 of 2024 On Traffic Regulation (the “**Federal Traffic Law**”), reinforcing that Dubai’s AV regime sits within (and will be interpreted consistently with) the evolving federal framework. Federal road-traffic compliance is subject to review and enforcement as part of the AV approval and renewal process.

b. Clear vehicle “buckets” that will shape requirements

Decision 939 clarifies the categories of AVs, allowing regulatory requirements to be calibrated to the specific risk profile of each vehicle type and providing clearer guidance that different AV platforms are subject to distinct regulatory expectations.

c. From “standards” to an evidence-backed “safety dossier”

Decision 939 builds on the Primary AV Law by shifting from general standards and inspections to an evidence-based safety dossier, requiring operators to demonstrate safety and readiness through certifications, testing history, Dubai-specific operational testing, and closure of identified observations.

d. Local operational testing as a regulatory requirement

Decision 939 makes local operational testing a mandatory step in the licensing process, requiring Dubai-specific testing evidence and resolution of identified observations, and confirming that foreign testing or certification alone is insufficient for commercial operation.

e. Dynamic compliance with performance standards

Decision 939 requires operators to continuously comply with performance standards published on the RTA website, reinforcing that AV compliance is dynamic and must be actively monitored as regulatory requirements evolve.

Two themes stand out for Operators:

- Data is treated like evidence (integrity, retention discipline, and regulator control over secondary use).
- The Operator is expected to be operationally “present”, able to respond, intervene, and manage incidents, not merely deploy technology.

3. Key issues that remain live for operators

Despite the additional clarity introduced by Decision 939, the AV regime remains intentionally modular. Certain elements continue to be delivered through Executive Council instruments, RTA manuals and website standards, creating a live compliance environment.

In particular, the list of permitted AV Activities and any staged expansion from testing to full commercial deployment have not been codified as a single end-to-end lifecycle. Operators should therefore adopt phased implementation plans and engage early with the RTA to align testing, licensing and operational scope.

Data governance expectations are clearly elevated, but detailed mechanics around retention, access and cross-border data transfers remain subject to future clarification, requiring Operators to design robust, regulator-ready governance frameworks.

Key takeaways

Decision 939 marks a shift from principle to execution. AV compliance in Dubai should be approached as a continuous operating system, combining regulatory engagement, evidence generation, contractual risk allocation and ongoing monitoring, rather than as a one-time licensing exercise.

Operators that align early with the RTA's evidence-led expectations and build adaptable compliance structures will be best positioned to navigate the evolving AV regulatory landscape in Dubai.

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