

Inquiry into e-mobility safety and use in Queensland

Submission No:	1121
Submitted by:	Caravan Parks Association of Queensland
Publication:	Making the submission and your name public
Attachments:	See attachment
Submitter Comments:	

CARAVAN PARKS ASSOCIATION OF QUEENSLAND

Submission for the
**Inquiry into e-mobility safety
and use in Queensland**

Perspective of Queensland's Caravan & Residential Parks



CPAQ Response to Inquiry into e-mobility safety and use in Queensland

To the State Development, Infrastructure and Works Committee

Date: 20 June 2025

Submitted by: Caravan Parks Association of Queensland (CPAQ)

Introduction

Caravan Parks Association of Queensland (CPAQ) welcomes the opportunity to provide input to the State Development, Infrastructure and Works Committee's Inquiry into e-mobility safety and use in Queensland.

As the peak body representing the interests of Queensland's caravan parks, residential parks and campgrounds, we offer a unique perspective on how Personal Mobility Devices (PMDs) and e-bikes are being used in public spaces that fall outside traditional transport infrastructure. Caravan parks are designated as public roads under Queensland law, yet they operate in complex, high-density environments where enforcement and infrastructure often lag behind community use and technological change.

Our members are not opposed to the principles of e-mobility, in fact, many support its potential to promote regional tourism and improve accessibility. However, the day-to-day reality is that unmanaged or unsafe e-mobility use in parks creates unacceptable safety risks, increases liability, and undermines the quality of the guest experience.

This submission draws on direct feedback from CPAQ members, who collectively manage a wide variety of park types across regional and urban Queensland. Their lived experience reflects a strong and consistent message: while e-mobility offers opportunities, the current regulatory framework and enforcement mechanisms are not adequately addressing the risks that come with it.

We urge the Committee to consider our feedback as part of a broader effort to ensure that Queensland's e-mobility framework is effective, fair, and responsive to the unique challenges faced by operators of publicly accessible private spaces.

1: Benefits of e-mobility (including both Personal Mobility Devices and e-bikes) for Queensland

Caravan Parks Association of Queensland (CPAQ) acknowledges the broad potential benefits of e-mobility for Queensland, including reduced congestion, increased transport accessibility, environmental gains, and enhanced mobility for individuals with limited physical

capacity. In the right circumstances, these devices can provide flexible, low-cost transport options and support healthier, more sustainable communities.

For our sector, e-mobility can offer a valuable way for visitors to explore regional areas, increasing local spend and contributing to Queensland's tourism economy. Some members also noted the potential for e-mobility to become a modest income stream for caravan parks through hire or guided experiences, particularly in areas with connected cycle or trail networks.

However, the actual usage of e-mobility devices within caravan parks presents a much more complex picture. Feedback from our members indicates that the majority of guests who bring or use e-scooters, e-skateboards and e-bikes do so for recreational purposes, not as a mode of transport. These devices are often treated as "toys," particularly by children and teenagers, which creates a higher likelihood of misuse and safety risks in the confined, shared spaces typical of caravan parks.

Where legitimate mobility needs exist, such as low-speed, speed-limited personal mobility buggies used by older Australians, there is strong support from operators. These devices contribute meaningfully to accessibility without compromising the safety of others.

The design and layout of most caravan parks includes narrow, shared roads and high volumes of pedestrian traffic, including children, older guests and pets. In this context, even otherwise well-regulated PMDs and e-bikes can pose unacceptable risks due to their speed, quiet operation, and limited rider experience.

In summary:

- CPAQ recognises the broader public benefit of e-mobility and supports its continued evolution in Queensland.
- In the context of caravan parks, the benefits are more limited and are often outweighed by the safety and operational challenges they present.
- Any future regulatory or policy settings should recognise the unique nature of shared environments like caravan parks, and provide for localised decision-making on permitted use.

We welcome continued engagement to ensure that Queensland's e-mobility framework supports both innovation and safety, without undermining the quality of guest experience in high-use tourism settings.

2: Safety issues associated with e-mobility use, including increasing crashes, injuries, fatalities, and community concerns

The safety risks associated with the use of e-mobility devices in and around caravan parks are a significant and growing concern for CPAQ members. Our members operate in environments that are fundamentally different from urban streets or cycleways.

Caravan parks are high-density, mixed-use spaces where pedestrians, children, cyclists, vehicles, pets and delivery staff frequently interact in close proximity. Critically, under Queensland law, the definition of a 'road' includes areas such as shopping centre car parks, railway crossings, and any area open to the public for use as a road. It also extends to 'road-related areas', including footpaths and nature strips. As such, roads within caravan parks are considered public roads, and the general road rules, including those relating to e-mobility, apply.

In this context, the risks presented by high-speed, quiet-operating Personal Mobility Devices (PMDs) and e-bikes are acute.

Feedback from park operators indicates:

- **Regular incidents of unsafe riding behaviour**, including excessive speed, erratic manoeuvring and use without helmets.
- **Near misses and collisions**, including incidents involving injuries to guests and damage to vehicles or property.
- **Unauthorised access by non-guests** using PMDs as cut-throughs, increasing both safety risks and the potential for theft or other criminal activity.
- **Particular concern for vulnerable guests**, such as children and older people, who are at increased risk in narrow, shared park roads and paths.

Illustrative Examples from Parks

- A park operator reported a young e-bike rider colliding with their parked vehicle while speeding along a footpath. The rider was fortunate to avoid serious injury, but the incident resulted in panel damage and insurance claims.
- Another member described guests being struck by passing scooter and bicycle riders, with riders fleeing the scene and the park ultimately being approached for liability, due to a lack of rider identification.
- One park has experienced multiple near misses and minor guest injuries due to e-scooters ridden at speed. As a result, they have implemented a complete ban on

PMD use within park boundaries and apply notes to guest bookings to support enforcement.

- A further concern raised was that PMDs appear to attract non-guests into parks, increasing instances of theft and unauthorised access. This has prompted some parks to invest in new perimeter fencing and secure gates to protect guests and staff.

These examples reflect a consistent pattern of concern across the sector. While some operators have introduced internal rules to limit or prohibit device use, such policies are difficult to enforce without broader regulatory support, particularly when non-guests are involved or riders leave the scene of an incident.

In summary:

- Caravan parks are legally defined as roads under Queensland law and are high-risk environments for e-mobility due to the density and diversity of users.
- Speed, silent operation and rider inexperience are critical risk factors, and actual incidents have already occurred in parks across Queensland.
- Internal enforcement by operators is limited in its effectiveness. Broader regulatory and enforcement frameworks must take into account the specific risks of e-mobility in private but publicly accessible spaces like caravan parks.

We strongly support the development of tailored safety provisions that apply to caravan parks and similar environments, to protect guests, staff and the broader community.

3: Ownership issues, including risk of fire, storage and disposal of lithium batteries used in e-mobility

The growing presence of e-mobility devices in the community raises serious concerns about the safe storage, charging, and disposal of lithium-ion batteries, particularly within accommodation environments like caravan parks.

Caravan parks are not traditional residential dwellings. Guest cabins, recreational vehicles and caravans often have only one entry/exit point, and interiors are compact with limited circulation space. When e-mobility devices are charged inside these dwellings, as is frequently the case for security reasons, this creates a high-risk scenario for fire, with the potential for blocked exits and delayed evacuation in the event of a thermal incident.

While several members noted they have not yet experienced a fire-related incident, there is broad awareness across the industry of the risks posed by lithium-ion batteries, and a shared concern about how best to manage them in practical, affordable, and enforceable ways.

Queensland Fire and Emergency Services (QFES) presented at a CPAQ Conference on the issue of lithium battery fires, highlighting the significant risk these fires pose and outlining strategies to reduce their likelihood. This further reinforced the need for proactive management across the sector.

A number of members reported:

- Guests routinely bringing devices into accommodation for charging to prevent theft, regardless of park policies.
- Consideration of external lockable charging facilities, which are seen as cost prohibitive to build and maintain, particularly with respect to power supply, safety monitoring, and the likely reluctance of guests to pay for this service.
- Resultant implementation of outright bans on PMDs and e-bikes in some parks, not due to a lack of support for their use, but due to the difficulty in managing safety risks at scale.

Importantly, some parks have also raised concerns about the lack of clear, accessible guidance on how to safely store and manage e-mobility batteries within tourism accommodation settings. While general electrical safety information is available, it often does not reflect the realities of temporary, high-turnover, mixed-use accommodation.

In summary:

- The fire risk posed by lithium-ion batteries is a significant concern for caravan parks, particularly given the nature of accommodation structures and guest behaviours.
- Safe charging infrastructure is cost-prohibitive for most operators and not likely to be supported by guest behaviour without regulation or incentives.
- Clearer guidance is needed for operators to manage battery safety in tourism accommodation settings.
- Without support or mitigation strategies, the industry is likely to see more widespread bans on these devices within caravan parks, reducing their accessibility and benefit.

We encourage the committee to consider regulatory solutions that support safe battery use and storage in commercial accommodation, including standards for charging infrastructure and nationally consistent fire safety education for guests.

4: Suitability of current regulatory frameworks for PMDs and e-bikes

While Queensland has taken a leading role in regulating Personal Mobility Devices (PMDs) and e-bikes, our members have consistently noted that the current regulatory framework does not

go far enough in addressing the practical realities of these devices within tourism and accommodation settings.

One of the most pressing issues raised is the difficulty in distinguishing between legal and illegal devices. Devices that visually resemble bicycles or scooters may in fact exceed legal wattage or speed limits, or operate on throttle-only power. Many operators report confusion among guests, suppliers and even park staff when trying to determine whether a device is compliant.

The variation in laws and definitions between jurisdictions further complicates the issue. For businesses operating in a tourism context, welcoming guests from across Australia, it is extremely difficult to monitor compliance when legal use varies from state to state. One member specifically noted the challenge of "keeping up with what's what" as laws shift.

Feedback also highlighted a lack of clarity around the responsibilities of retailers. While some progress has been made, illegal or non-compliant devices are still being sold and misrepresented as lawful for public use, leading to unintentional breaches by consumers.

Several members expressed concern that shared e-mobility schemes are poorly regulated in terms of visual clutter, storage, and parking. Devices are frequently left abandoned or obstructing access points, detracting from the visual amenity of streetscapes and tourism areas.

In summary:

- The current framework does not provide sufficient clarity or enforcement to protect caravan parks from the risks associated with illegal or unsafe devices.
- Inconsistent rules across jurisdictions create confusion and compliance issues for guests and park managers alike.
- Stronger regulation of retailers, including clearer labelling and compliance requirements, is needed.
- Commercial shared schemes require more oversight to ensure they do not negatively impact public spaces.

We support a nationally harmonised framework with clear definitions and compliance requirements, combined with state-level flexibility to respond to high-use areas like caravan parks, schools and pedestrian precincts.

5: Effectiveness of enforcement for dangerous riding behaviours and the use of illegal devices

Across the sector, there is consensus that current enforcement measures are not sufficient to address unsafe or illegal e-mobility use, particularly in settings like caravan parks that are open to the public but not routinely patrolled by authorities.

Park operators report that they are left to enforce safety rules internally, often without the authority or resources to do so effectively. Several parks have banned PMDs and e-bikes within their boundaries, but compliance relies on individual guests respecting the rules. When unsafe behaviour occurs, particularly involving local residents using parks as cut-throughs, operators have no real capacity to intervene.

Further, incidents involving injuries or property damage often go unaddressed. As noted in feedback provided in section 2, riders involved in collisions often flee the scene, leaving the park or even the local council exposed to potential liability. Without a means of identifying riders, such as registration or licensing, there is no effective mechanism to pursue accountability or reinforce consequences.

There is strong support among members for:

- Geo-fencing technology to restrict the operation of PMDs and e-bikes in sensitive areas such as parks, malls, and shared zones.
- Substantial penalties for repeat or serious offenders, particularly where dangerous behaviour or non-compliance is involved.
- A registration and licensing system, particularly for high-speed devices, which would support identification and enforcement, as well as embed safety education.

Despite recent blitzes and publicised crackdowns, members do not see consistent on-the-ground enforcement. In most cases, enforcement is reactive, not proactive, and unlikely to deter misuse.

In summary:

- Current enforcement frameworks do not provide adequate coverage for locations like caravan parks, which are public roads under Queensland law but sit outside routine patrol areas.
- Park operators lack the authority to manage the problem effectively, particularly when non-guests are involved.
- Repeat offences, unsafe behaviour and use of illegal devices are not being deterred under the existing model.

- Regulatory and technological tools, such as geo-fencing, licensing, and targeted enforcement, should be expanded to improve safety outcomes.

CPAQ strongly supports the development of practical enforcement tools and expanded authority for officers to manage unsafe use in mixed-use public environments, such as caravan parks.

6: Gaps between Commonwealth and Queensland laws that allow illegal devices to be imported and used

CPAQ notes that no specific member feedback was provided on this issue. However, several members expressed confusion about the legality of different devices and highlighted the difficulty in identifying compliant versus non-compliant models. This suggests that any gaps between Commonwealth importation rules and Queensland usage regulations may be contributing to real-world compliance challenges for businesses and consumers.

We encourage further examination of the alignment between import standards and state-based regulation to prevent illegal or unsafe devices entering the Queensland market under misleading pretences.

7: Communication and education about device requirements, rules, and consequences for unsafe use

CPAQ strongly supports the need for improved communication and education regarding the lawful and safe use of e-mobility devices. Member feedback highlights a lack of awareness among guests, particularly younger riders, of the rules governing device use, appropriate protective equipment, and the consequences of unsafe behaviour.

Several park operators have implemented their own internal rules banning the use of PMDs and e-bikes within park boundaries. However, enforcement is hampered by the perception that these are “toys” rather than regulated vehicles, especially among families and children. One member noted that it is now unusual to see children wearing helmets while using PMDs, even when helmets are mandated.

There is strong support for public education initiatives that are targeted, visible, and high-impact, including:

- Campaigns in schools and retail outlets where devices are commonly purchased.
- Clear point-of-sale information for consumers outlining the rules, penalties, and safe usage practices.

- “Shock-style” campaigns, similar to those used for anti-drink-driving, to highlight the real risks of injury, death and liability.
- Clearer rules and signage in high-use public areas, including caravan parks, malls, and coastal foreshore paths.

Operators also support the integration of education through possible licensing or registration frameworks, which could include a mandatory awareness component for users of higher-powered devices.

In summary:

- Existing communication efforts have not yet shifted community attitudes or behaviours to the extent needed.
- Stronger, more visible public campaigns are needed, particularly for children and families.
- Education should be integrated at the point of sale and potentially through licensing frameworks.
- Caravan parks, as public roads under Queensland law, should be included in future education and signage efforts.

We welcome the opportunity to work with government agencies to distribute targeted materials across Queensland’s network of caravan parks and support a more informed and safety-conscious public.

Conclusion

The Caravan Parks Association of Queensland appreciates the opportunity to contribute to this important inquiry into e-mobility safety and use. Our members recognise the potential benefits of e-mobility for Queensland’s transport and tourism future, but these must be balanced with clear regulation, effective enforcement, and practical support for those operating in high-risk, shared-use environments.

Caravan parks are uniquely impacted by the challenges of e-mobility. As public roads under Queensland law, they are accessible to both guests and the broader community, yet they lack the enforcement presence or infrastructure needed to manage risks independently. Without action, the safety of guests, staff and residents will continue to be compromised, and operators may increasingly adopt outright bans, undermining the broader accessibility and benefits of e-mobility.

We encourage the committee to consider regulatory solutions that are nuanced, enforceable, and adaptable to shared public spaces such as caravan parks. We also welcome further

opportunities to engage on this issue and assist in the development of practical industry guidance.

About Us

Caravan Parks Association of Queensland (CPAQ) is the peak industry body representing caravan parks, residential parks and campgrounds throughout Queensland. Our members range from small family-owned businesses to large multi-park groups and play a critical role in the state's tourism and affordable accommodation sectors.

CPAQ supports members to deliver exceptional guest experiences, advocates for regulatory fairness, and promotes sustainable growth across the industry. As the trusted voice for Queensland's caravan park sector, we work closely with government and stakeholders to ensure that the regulatory environment reflects the realities of on-the-ground operations and supports safe, accessible, and responsible tourism experiences.

Contact

For more information about this submission or to speak with us further about issues affecting caravan parks offering residential tenancies, please contact:

Caravan Parks Association of Queensland (CPAQ)

- Email: parks@caravanqld.com.au
- Phone: 07 3862 1833 (opt 2)
- Website: www.caravanqld.com.au