Inquiry into e-mobility safety and use in Queensland

Submission No:	1153
Submitted by:	Gold Coast North Chamber of Commerce & Industry Inc
Publication:	Making the submission and your name public
Attachments:	See attachment
Submitter Comments:	

GOLD COAST NORTH
CHAMBER OF COMMERCE

20 June 2025

Dear Mr McDonald MP and Committee Members,

The Gold Coast North Chamber of Commerce is pleased to provide its submission to the State Development, Infrastructure and Works Committee's Inquiry into E-Mobility Safety and Use in Queensland.

As a major tourism hub and a rapidly growing region, the Gold Coast is at the forefront of e-mobility adoption. While we recognise and support the significant opportunities that e-mobility presents for sustainable transport, improved accessibility, and economic vitality, our community is experiencing critical safety challenges and regulatory gaps that demand urgent attention firsthand.

The alarming increase in incidents, injuries, and fatalities involving these devices, as well as the proliferation of illegal and modified devices, underscores the need for a robust and forward-thinking legislative response.

Our submission details our observations, concerns, and a comprehensive suite of recommendations to create a safer and more harmonious environment for all road and path users. A thorough review will inform these comments and recommendations of the Department of Transport and Main Roads' briefing, as well as an analysis of best practices from other Australian jurisdictions, particularly the recent NSW Legislative Council inquiry.

Key areas addressed include:

- Implementing a tiered licensing and permit system to enhance rider competency and accountability.
- Elevating safety gear standards to better protect vulnerable users.
- Promoting device redesigns and clearer usage standards to mitigate inherent risks.
- Strengthening vehicle identification and retail controls to curb the influx of non-compliant devices.
- Investing in dedicated infrastructure and empowering local councils to manage safe riding environments.
- Fostering a culture of safety through comprehensive education and community outreach programs.

We firmly believe that these are achievable solutions that will enhance public safety and ensure Queensland's e-mobility ecosystem is well-prepared for the future, including the 2032 Olympic and Paralympic Games.

Office Address: 8/465 Oxley Drive | Runaway Bay | Qld 4216
Postal Address: PO Box 1359 | Paradise Point | Qld 4216
Phone 1300 765 057
Email: secretary@gcncc.org.au

GOLD COAST NORTH
CHAMBER OF COMMERCE

The Gold Coast North Chamber of Commerce stands ready to assist the Committee further in its vital work. We urge your serious consideration of the recommendations outlined in our attached submission.

Yours sincerely,

Gary Mays
Secretary
Gold Coast North Chamber of Commerce & Industry Inc

Office Address: 8/465 Oxley Drive | Runaway Bay | Qld 4216
Postal Address: PO Box 1359 | Paradise Point | Qld 4216
Phone 1300 765 057
Email: secretary@gcncc.org.au

GOLD COAST NORTH
CHAMBER OF COMMERCE

Executive Summary: Enhancing E-Mobility Safety and Use in Queensland

The Gold Coast Chamber of Commerce presents this submission to the State Development, Infrastructure and Works Committee to address the escalating safety concerns and regulatory gaps surrounding e-mobility devices in Queensland. While acknowledging the significant benefits of e-mobility for sustainable transport, accessibility, and economic growth, the Chamber highlights an alarming increase in incidents, injuries, and fatalities, primarily driven by the proliferation of non-compliant devices and unsafe rider behaviour.

Key Challenges Identified:

- Rising Incidents: A 112% increase in injuries from 2021-2024 and eight fatalities in 2024 alone underscore severe safety risks for riders, pedestrians, and passengers.
- Proliferation of Illegal Devices: High-powered, throttle-only e-bikes and modified
- Devices bypass existing regulations, creating an unfair and dangerous environment.
- Lack of Clarity and Enforcement: Ambiguity in current legislation hinders effective enforcement, particularly concerning devices that blur the lines between e-bikes and motorcycles.
- Inadequate Infrastructure and Rider Knowledge: Shared paths create conflict, and many riders lack sufficient understanding of road rules and safety.

Recommended Enhancements:

To create a safer and more harmonious e-mobility ecosystem, the Chamber proposes critical enhancements, leveraging best practices from other jurisdictions:

- Tiered Licensing and Permits: Implement a mandatory online theory test for all e-mobility users aged 14-17 (leading to an E-Mobility Permit) and a practical E-Riding Licence test at 17 for higher-powered devices, classifying high-speed e-bikes as motorcycles.
- Elevated Safety Gear Standards: Mandate high-quality, high-visibility helmets for all riders, meet advanced e-safety standards, and require reflective safety vests for younger riders (12-16).
- Device Redesign and Standards: Advocate for e-scooter redesigns to include seats for improved stability and ban e-scooters from roads with speed limits exceeding 50 km/h. Councils should consider lowering speed limits to 30 km/h in suitable communities to encourage safe e-bike use.
- Vehicle Identification & Retail Controls: Introduce mandatory registration with unique identification for e-bikes and higher-powered PMDs. Implement controlled distribution via registered retailers who must record sales and provide compliant safety gear at the point of purchase.

Office Address: 8/465 Oxley Drive | Runaway Bay | Qld 4216
Postal Address: PO Box 1359 | Paradise Point | Qld 4216
Phone 1300 765 057
Email: secretary@gcncc.org.au

- Improved infrastructure and Council authority are challenges for councils as there is an urgency to construct -e-bike lanes and paths, and the dropping of the speed to 30km/h would be accepted by the e-mobility community. Users will be forced onto roads when e-bikes and e-scooters are prohibited from shared pathways and bikeways. Dropping the speed to 30km/h would be popular within the community.
- Prohibiting is supported with e-mobility on pedestrian footpaths in high-traffic areas is welcomed. The Gold Coast North Chamber of Commerce supports state funding for dedicated cycle paths and wider, clearly demarcated shared paths. It empowers local councils with consistent authority for local speed limits, signage, and designated parking hubs.
- Comprehensive Education & Community Outreach: Implement mandatory in-school e-mobility education programs from primary school alongside targeted public awareness campaigns addressing dangerous behaviours and the risks of illegal devices and lithium-ion battery fires.

Conclusion:
The Gold Coast Chamber of Commerce urges the Committee to act decisively. These recommendations, supported by collaborative efforts across government agencies, emergency services, businesses, and the community, are essential to mitigate risks, protect public well-being, and ensure Queensland's e-mobility future is safe, responsible, and prepared for significant events like the 2032 Olympic and Paralympic Games.

Office Address: 8/465 Oxley Drive | Runaway Bay | Qld 4216
Postal Address: PO Box 1359 | Paradise Point | Qld 4216
Phone 1300 765 057
Email: secretary@gcncc.org.au

Gold Coast Chamber of Commerce Submission on E-Mobility Safety and Use in Queensland

To: State Development, Infrastructure and Works Committee
From: Gold Coast North Chamber of Commerce
Date: 20 June 2025

1. Presently Authorised E-Mobility Devices (under current legislation)
The Chamber acknowledges the Queensland Government's current regulatory framework defining permissible e-mobility devices. A clear understanding of these definitions is fundamental to addressing safety and enforcement.

- **Personal Mobility Devices (PMDs):** This category primarily includes e-scooters, e-skateboards, e-unicycles, and Segway-style devices. To be legally operated on public land, these devices must adhere to strict physical specifications regarding size (e.g., max 1,250mm long, 700mm wide, 1,350mm high), weight (max 60kg unladen), and power limits. The current maximum speed limit for PMDs is 12 km/h on footpaths and shared paths (unless otherwise signed) and 25 km/h on bike paths and certain roads. Riders must be 16 years or older, or at least 12 years and supervised by an adult.
- **E-Bikes:**
  - **EPACs (Electrically Power Assisted Cycles):** These are the most common authorised e-bikes, defined by a maximum continuous rated power of 250 watts. Their motor assistance is solely pedal-activated and must cut off at speeds exceeding 25 km/h. Compliance with the European standard EN15194 is a key requirement.
  - **200-watt power-assisted bicycles:** This represents a legacy standard for e-bikes that are also currently permitted. E-bikes are generally considered regular bicycles with pedal assistance, and no license is required.

The Chamber notes with significant concern the growing prevalence of **devices NOT authorised** for public use, which pose profound safety and community risks. These include:

- Throttle-only or high-powered e-bikes (exceeding 250 watts), often referred to as "stealth bikes."
- E-bikes capable of speeds greater than 25 km/h without pedalling assistance.
- Bicycles fitted with internal combustion engines.
- Any other high-speed, high-powered, non-registered devices, often modified or imported outside of safety standards and designed to circumvent existing regulations.

GOLD COAST NORTH CHAMBER OF COMMERCE

2. Reasons for Legislation and the Current Context

The necessity for robust e-mobility legislation in Queensland is driven by several critical factors observed in our community and echoed by recent data:

- **Rising Incidents and Community Concerns:** The Gold Coast has experienced a significant increase in crashes, injuries, and, tragically, fatalities involving both PMDs and e-bikes. Between 2021 and 2024, there was a **112% increase in injuries** to riders, passengers, and pedestrians in Queensland. Eight e-mobility device users died in Queensland in 2024 alone. Anecdotal evidence from local residents and businesses confirms a growing sense of unease regarding unregulated speeds, dangerous riding behaviours (e.g., tandem riding, mobile phone use), and significant conflicts with pedestrians, particularly those with disabilities or young children. As a major tourism hub, the Gold Coast sees high usage, intensifying these safety concerns and placing significant strain on emergency services and healthcare.
- **Proliferation of Illegal Devices:** A major challenge is the widespread availability and use of modified or imported devices that resemble e-bikes but function with the power and speed of motorcycles. These devices bypass registration, licensing, and safety requirements, creating an unfair and dangerous environment for compliant users and other road participants. This gap between Commonwealth importation laws and Queensland usage laws allows unsafe devices to enter the market.
- **Safety Imperatives:** The unregulated and often reckless use of e-mobility devices places pedestrians, riders themselves, and the wider community at unacceptable risk. This risk is amplified in shared spaces where speed differentials and varying levels of rider skill lead to dangerous encounters.
- **Clarity and Enforcement:** Clear legislation is essential to distinguish between legitimate personal mobility devices designed for urban environments and higher-powered vehicles that demand traditional vehicle registration, licensing, and stricter road rules. Without this clarity, effective enforcement remains a significant challenge for law enforcement.

3. Chamber's Current Position: Support with Critical Enhancements

The Gold Coast Chamber of Commerce broadly **supports the foundational aspects of the current legislative framework** for e-mobility in Queensland. We particularly commend the clarity in defining compliant devices, the empowerment of local councils to regulate usage zones (which allows for adaptive local solutions), and the mandatory helmet requirements. These provisions are crucial for establishing a baseline of safety.

However, informed by the Department of Transport and Main Roads' briefing, our engagement with local residents, and a review of best practices from other jurisdictions (including the recent NSW inquiry), the Chamber firmly believes that **significant enhancements are required** to adequately safeguard users and the wider community. Our commitment is to foster an e-mobility ecosystem that is safe, accessible, and supports economic activity without compromising public well-being.

Office Address: 8/465 Oxley Drive | Runaway Bay | Qld 4216
Postal Address: PO Box 1359 | Paradise Point | Qld 4216
Phone 1300 765 057
Email: secretary@gcncc.org.au

4. Recommended Changes and Reasons: Leveraging Best Practices

Our recommendations are designed to address the identified gaps and risks, drawing insights from recent developments in other Australian states, notably the NSW Legislative Council's 2025 inquiry recommendations, and aligning with national goals for safety and active transport.

4.1. Licensing & Permits: Implementing a Tiered Approach

- **Treat high-speed e-bikes (e.g., those over 250W or capable of throttle-only propulsion above 25 km/h) as motorcycles under the law.** These devices, by their nature and capability, present similar risks to low-powered motorcycles and should be regulated accordingly.
  - *Research Insight (NSW 2025):* The NSW inquiry highlighted the issue of "fat bikes" and illegally modified e-bikes, acknowledging devices circumventing design specifications. While NSW has not yet adopted full motorcycle classification, their focus on enforcement against these devices underscores the shared problem. Victoria's ongoing e-scooter legalisation includes a 20 km/h speed limit and 16+ age restriction, but also faces challenges with high-powered illegal devices.
- **Require a structured pathway to legal operation for all e-mobility devices:**
  - **Online E-Mobility Permit recommended:** A mandatory online theory test for all e-mobility users aged 14 to 17 yrs covering Queensland road rules, device limitations, and safety protocols. This could be integrated into existing transport services platforms. On passing the online test ,the permit applicant must attend with a parent /guardian to a Queensland Transport Testing Centres. After lodging an approved E-Riding Permit application including a printout of the applicants online test result the Queensland Transport Officer will issued the applicant with an E-Mobility/E-Bike permit with the applicants photograph and a personal identification number. A ten hour deduction to be taken off the training hours required when the users applies at 16yr for a learners permit to drive a vehicle.
  - E-scooters /E-cycles users holding a permit and with a parent/guardians signed approval on the riders application are permitted to ride without supervision.
  - **Practical Test at 17 for E-Riding Licence (for higher-powered PMDs and e-bikes):** Introduce a practical E-Riding test administered by transport officers, akin to a restricted motorcycle licence, ensuring riders possess the necessary skills for these more powerful devices.
- **School Training and Education for Ages 12–16:** Implement comprehensive programs, ideally integrated into the school curriculum or community-based initiatives, encompassing:
  - An online safety knowledge test
  - A practical skills training to demonstrate proficiency and safe handling before riding in public areas unsupervised.

Reason: This tiered licensing and training approach, especially for younger riders and higher-powered devices, directly addresses concerns about rider competency and accountability. It

ensures riders understand rules and consequences, mitigating dangerous behaviours and preventing untrained individuals from operating potentially hazardous devices. This aligns with NSW's inquiry (Recommendation 29 and 31) which advocates exploring online safety tests for under 16s and ensuring users are aware of basic road rules. The current absence of a licence for any PMD or e-bike, even those capable of significant speeds, is a major gap in accountability.

4.2. Safety Gear: Elevating Protection Standards

- **Introduce compulsory high-quality helmets:** Mandate high face helmets meeting advanced new E-safety standards (e.g., compliant with motorcycle helmet standards where appropriate for device speed capabilities) for riders of all e-mobility devices.
- Helmets should be of safety colours (not black) with high visible strips to provided added safety. Many young users of e-mobility devices wear dark colour clothing.
- **Mandate reflective safety vests for ages 12–16:** Require high-visibility, reflective safety vests for younger riders when operating devices in public areas, particularly during dawn, dusk, and night-time hours. Users aged 12yrs to 14yrs to use E-Mobility devices under parent /guardian supervision .

Reason: Current incidents demonstrate that standard bicycle helmets may not offer sufficient protection in high-speed e-mobility crashes, leading to severe head injuries. Enhanced helmet standards and high-visibility measures will significantly increase protection for vulnerable users, a fundamental safety principle. The RACQ, in their submission to this inquiry, has also advocated for stricter helmet standards and more stable device models.

4.3. Device Redesign and Standards: Enhancing Inherent Safety

- **Recommend e-scooters be redesigned with a seat.** This would significantly improve balance and control, especially for less experienced riders or on uneven surfaces, and reduce fatigue on longer rides.
- **Ban e-scooters from roads with a speed limit exceeding 50 km/h.** While current Queensland rules already limit PMDs to 25 km/h on certain roads, this explicit ban reinforces that PMDs are not suitable for higher-speed vehicle environments, where interactions with motor vehicles become exponentially more dangerous.
- Councils may consider lowering the speed limit to 30 km/h for suitable communities/hubs encouraging e-bikes to use on roadways and bike paths. . Council to consider including appropriate road signs (speeds signs and give way to E-bikes /E-scooters to avoid confusion .

Reason: Many existing e-scooter designs are inherently unstable, contributing to falls and serious injuries. Design improvements and clearer demarcation of appropriate usage environments will enhance rider safety and reduce crash risk on unsuitable road types. This supports the general direction of NSW's inquiry which seeks to integrate e-scooters safely.

4.4. Vehicle Identification & Retail Controls: Increasing Traceability and Compliance

- **Introduce mandatory registration of e-bikes with unique number plates or ID tags, and potentially for higher-powered PMDs.** This will enable identification in

case of an incident, illegal modification, or abandonment, significantly enhancing accountability for owners and riders.

- *Research Insight (NSW 2025):* The NSW inquiry identified modification of devices as a key concern, and is exploring product safety requirements. Mandatory registration would greatly assist in tracking and controlling such issues. RACQ has also indicated support for some form of registration for shared e-scooters.

- **Implement controlled distribution through registered retailers:**
  - Retailers to register /record / regulated E-Mobility devices at the point of sale, linking the device to the purchaser. a state wide register for e-bikes may be of value. Manufacturers could include a fixed e-bike identification finder tag or identification number. To be further examined by The federal and state Governments.
  - Retailers must provide compliant helmets and safety vests at the time of purchase, ensuring immediate safety readiness.
  - *Research Insight (NSW 2025):* NSW is implementing new product safety requirements for lithium-ion e-micromobility devices from February 2025, with enforcement from August 2025. This includes requirements for clear safety information and compliance at the point of supply, directly aligning with our push for responsible retail practices and curbing the sale of non-compliant devices.

Reason: This comprehensive approach tackles the proliferation of illegal and unsafe devices at the source. Mandatory identification increases accountability and aids enforcement, while retail controls ensure that consumers are equipped with legally compliant and safe devices from the outset, reducing fire risks associated with non-compliant batteries and chargers.

4.5. Infrastructure & Council Authority: Creating Safe Riding Environments

- **Councils should prohibit e-mobility use on pedestrian footpaths and shared paths** in designated high-traffic or high-vulnerability areas (e.g., CBDs, school zones, hospital precincts). Generally e-mobility devices are highly popular for transportation in order to travel from A to B . The need for more cycle paths/lanes connecting suburbs, shopping hubs, schools and other popular destinations is a high priority .
- **Councils should be supported by State funding and required to provide adequate alternative infrastructure**(e.g., dedicated bike lanes, clearly marked shared paths, wider paths with clear demarcation for different user types) to safely accommodate e-mobility.
  - *Research Insight (Victoria):* Victoria's recent permanent legalisation of e-scooters, following trials, emphasises staying off footpaths and using bicycle lanes, shared paths, and lower speed roads. This aligns directly with our push for separating e-mobility from pedestrians. The Brisbane City Council's e-mobility plan also highlights the importance of keeping pathways clear and using designated parking.

- **Councils must have clear, consistent authority to control local speed limits, signage, and dedicated parking for devices.** This allows for flexibility to respond to local context while maintaining overarching state guidance. Designated e-mobility parking areas (hubs) are a best practice highlighted by TMR's own e-Mobility Parking Plan.

Reason: The current mixed-use environment on footpaths creates significant conflict and danger, particularly for vulnerable pedestrians. Dedicated and appropriately signed infrastructure allows for safer separation, while localised control ensures solutions are tailored to community needs and promote orderly transitions.

4.6. Education & Community Outreach: Fostering a Culture of Safety

- **Mandatory collaboration between the Department of Education, Department of Transport and Main Roads, and Queensland Police Service** to deliver:
  - Comprehensive **in-school e-mobility education programs** from primary school upwards, teaching safe riding practices, road rules, and respect for other road and path users. This is analogous to successful water safety programs.
  - Structured **permit programs for students aged 14 to 17**, integrating with the online and practical testing outlined in Section 4.1.
  - Students aged 12 yrs to 14 yrs to participate in school e-scooter and _e-bike training programs
  - Targeted **public awareness campaigns** through various media, specifically addressing dangerous behaviours (e.g., excessive speed, mobile phone use, tandem riding) and the severe risks of illegal devices, including battery fire hazards. These campaigns should be culturally sensitive and accessible to all community groups.
  - *Research Insight (NSW 2025):* NSW's inquiry recommends boosting rider and road user education, with new voluntary tests, campaigns, and updates to in-school road safety education programs. The Australian Medical Association (AMA Queensland) and Bicycle Queensland have also strongly advocated for enhanced education campaigns due to the rise in injuries.

Reason: Education is a powerful preventative tool. By fostering a strong culture of responsible riding from a young age and providing ongoing, high-impact public awareness, we can proactively address dangerous behaviours and ensure all community members understand their roles and responsibilities in a shared environment.

5. Chamber's Perspective on Terms of Reference: Insights and Achievable Solutions

The Gold Coast Chamber of Commerce's position directly addresses each of the Committee's terms of reference, offering practical insights and achievable solutions:

| Term of Reference | Chamber Position & Insights |

6. Report: Key Opportunities, Risks, and Achievable Insights

6.1. Key Opportunities for Queensland

E-mobility presents a transformative opportunity for Queensland, particularly as we approach the 2032 Olympic and Paralympic Games, offering benefits that extend beyond mere transport:

- **Sustainable Transport Solutions:** E-mobility devices contribute significantly to reduced carbon emissions, aligning with Queensland's climate change targets. By offering an alternative to traditional vehicles, they alleviate traffic congestion and parking pressures in bustling areas like the Gold Coast, improving urban flow and air quality. They promote a greener, more sustainable urban environment.
- **Enhanced Accessibility and Connectivity:** E-mobility provides affordable, flexible, and convenient transport options for diverse demographics, including tourists and residents. These devices can bridge "last-mile" gaps in public transport networks, making destinations more accessible and integrating seamlessly with existing bus and rail infrastructure. Shared e-mobility schemes, when well-regulated, offer a convenient, short-term transport alternative.
- **Economic Benefits:** A well-regulated and safe e-mobility sector can stimulate local businesses, creating jobs in sales, maintenance, and rental services. It can also attract innovation in transport technology and position Queensland as a leader in sustainable urban mobility. The Gold Coast's tourism sector stands to benefit from enhanced visitor mobility options.
- **Active Lifestyles and Public Health:** Encouraging the use of e-bikes, in particular, promotes physical activity and contributes to healthier communities by reducing sedentary lifestyles. Even e-scooters encourage outdoor activity and engagement with the local environment.

6.2. Key Risks and Challenges

Despite these opportunities, several significant risks demand urgent and coordinated attention:

- **Escalating Injuries and Fatalities:** The most pressing risk is the alarming surge in serious accidents involving e-mobility devices. Emergency services on the Gold Coast are witnessing firsthand the severe trauma associated with these incidents, placing immense strain on healthcare resources (e.g., paramedics, emergency departments, trauma specialists). Data from Queensland Injury Surveillance Unit shows 1,504 presentations to emergency departments from e-scooter incidents in 2024 alone.
- **Conflict with Pedestrians and Vulnerable Users:** The current mixed-use environment on footpaths, where fast-moving e-mobility devices share space with pedestrians, creates significant danger. This is particularly acute for individuals with mobility impairments, vision impairment, or young children, leading to falls, collisions, and a reduction in public amenity and safety for all path users.
- **Proliferation of Non-Compliant Devices and Modifications:** The ease of importing and modifying high-powered e-bikes and PMDs that far exceed legal limits poses a critical safety hazard. These "stealth bikes" operate outside safety regulations, are

difficult to identify, and contribute disproportionately to accidents due to their speed and power, creating an unfair playing field for compliant users.

- **Fire Hazards from Lithium-Ion Batteries:** Unregulated, damaged, or poorly manufactured lithium-ion batteries, particularly from cheaper, non-compliant devices, pose a significant and growing fire risk during charging, storage, and disposal. These fires can be volatile and difficult to extinguish, impacting homes, businesses, and public spaces, and are a serious concern for QFES.
- **Inadequate Infrastructure:** Current infrastructure often struggles to safely accommodate the growing volume and speed of e-mobility devices, leading to unsafe riding environments, pedestrian conflicts, and a lack of clear pathways for users. Shared paths can become overcrowded and dangerous when speeds are not adequately managed or different user types are not appropriately separated.
- **Lack of Rider Knowledge and Accountability:** A significant portion of riders lack adequate understanding of road rules, device limitations, and the severe consequences of unsafe behaviour. The absence of comprehensive licensing, registration, and consistent enforcement for many devices exacerbates accountability issues, making it difficult to identify and penalise repeat offenders.

6.3. Achievable Insights: Opportunities for Queensland Leadership

The Gold Coast Chamber of Commerce believes that the risks can be effectively mitigated through a proactive, coordinated, and evidence-based approach, positioning Queensland as a leader in e-mobility safety:

- **Embrace a "Safety by Design" Philosophy:** Encourage and incentivise manufacturers and importers to prioritise inherent safety features in device design (e.g., better braking, integrated lighting, improved stability). Queensland can advocate for national product safety standards that mandate these features.
- **Invest Strategically in Dedicated Infrastructure:** Prioritise state and local government funding for safe, separated e-mobility infrastructure (e.g., dedicated bike lanes, wider shared paths with clear lane markings) where feasible, especially in high-traffic urban areas. This is a long-term investment that yields significant safety dividends.
- **Implement a Progressive Education and Licensing System:** Adopt the tiered licensing system proposed (online permit, practical test), coupled with mandatory, engaging in-school and public education campaigns. This builds knowledge and accountability from the ground up.
- **Strengthen Commonwealth-State Alignment on Importation:** Queensland should lobby the Commonwealth forcefully to implement stricter import controls on e-mobility devices and batteries, ensuring only compliant products enter Australia. This would significantly curb the influx of illegal and dangerous devices.
- **Empower and Resource Enforcement Agencies:** Provide the QPS with clear legislative powers and adequate resources to effectively enforce e-mobility rules, including the ability to impound illegal devices and issue meaningful penalties for dangerous riding. Amended Legislation to allow Police to officially caution a juvenile offender in the presence of a parent/guardian for a traffic infringements

- **Leverage Technology for Safety:** Explore how technology (e.g., geo-fencing for shared schemes to enforce speed limits in specific zones, smart parking solutions) can contribute to safety and compliance, as highlighted in TMR's e-Mobility Parking Plan.
- **Establish a Multi-Stakeholder E-mobility Safety Council:** Formalise a regular forum involving all key agencies (TMR, QPS, QAS, QFES, Education, Local Government), industry, and community advocates (including disability groups, pedestrian groups, rider associations) to share data, evaluate policies, and collaboratively adapt regulations as the sector evolves.

7. Key Players and Collaborative Imperatives

The successful integration of e-mobility devices into Queensland's transport network, ensuring safety for all, hinges on strong leadership from the Queensland Government and genuine, effective collaboration across all key agencies and stakeholders. The Gold Coast Chamber of Commerce urges the inquiry to emphasise the following:

The Queensland Government (Department of Transport and Main Roads) must provide the overarching strategic direction, policy framework, and legislative clarity. This includes setting state-wide rules, coordinating infrastructure funding, and leading high-profile public education campaigns. **They are the orchestra conductor.**

However, their leadership must be complemented by the dedicated efforts and seamless cooperation of:

- **Queensland Police Service (QPS):** Essential for robust enforcement of road rules, apprehending dangerous riders, seizing illegal devices, and conducting highly visible operations to deter unsafe behaviour. Their powers must be clear, unambiguous, and adequately resourced.
- **Queensland Ambulance Service (QAS) and Queensland Fire and Emergency Services (QFES):** Integral to providing critical incident response, collecting vital data on injuries and fatalities, and responding to battery-related fires. Their frontline insights are invaluable for understanding the true scale and nature of safety risks and informing preventative measures.
- **Department of Education:** Crucial for integrating comprehensive e-mobility safety education into school curricula, fostering responsible rider behaviour from a young age, and promoting a culture of respect for all path users. This proactive approach cultivates a safety-conscious generation.
- **Local Councils:** Must be empowered and adequately resourced (including through state funding) to implement local regulations, manage parking (e.g., designated e-mobility parking hubs as per TMR's plan), develop and maintain localised infrastructure (bike lanes, shared paths), and address specific community concerns within their jurisdictions.
- **Businesses (E-mobility Industry & Retailers):** Have a responsibility to sell only compliant devices that meet Australian safety standards, provide accurate safety information at the point-of-sale (including battery safety), and actively contribute to rider education. Rental companies must ensure their fleets comply with safety

standards, promote safe riding practices, and implement technology (e.g., geo-fencing) to enhance safety.

- **Parents:** Play a vital role in educating their children about e-mobility rules, supervising younger riders, and ensuring devices are used safely and legally. Their active involvement is paramount, particularly given the vulnerability of young riders.Parents must be held accountable for children under their authority and ensure all users are wearing helmets and safety vests when using a mobility device on public roads and public areas. Parents to have appropriate insurance for any e-mobility device owned and is used on roads or any public areas.
- **Riders:** Bear the ultimate responsibility for operating devices safely, adhering to rules, showing consideration for others, and ensuring their devices are compliant and well-maintained.
- **The General Community (Pedestrians, Vehicle Owners, Disability Advocates):** Their experiences, concerns, and insights are invaluable. Clear, accessible communication channels must be established to ensure their voices are heard and addressed in policy development. Respectful coexistence and a shared understanding of responsibilities are key to a safe travelling environment for everyone. The Queenslanders With Disability Network's forum on e-mobility safety highlights the importance of this engagement.

8. Research into Best Practices: Supporting the Chamber's Submission

Our recommendations are not isolated but are strongly supported by emerging best practices and policy directions in other jurisdictions, particularly within Australia. These demonstrate a clear shift towards more regulated and comprehensive approaches to e-mobility safety.

8.1. Deep Dive into NSW E-mobility Inquiry Recommendations (2025):

The NSW Legislative Council's recent inquiry provides a robust framework and valuable insights that strongly support the Gold Coast Chamber's positions:

- **Product Safety and Certification (Lithium-ion Batteries):** NSW has taken a leading stance by making lithium-ion e-micro mobility devices and their batteries "declared electrical articles" under the *Gas and Electricity (Consumer Safety) Act 2017*.
  - **Best Practice:** From **February 2025**, these products sold in NSW must comply with prescribed mandatory safety standards (e.g., AS/NZS 60335.2.114:2023 or UL 2271 for batteries). From **August 2025**, enforcement will commence, with significant fines (up to $825,000 for product safety breaches). Suppliers must also provide clear safety information at the point of supply from **February 2025**.
  - **Relevance to QLD:** This is a crucial best practice for Queensland. Currently, there are gaps that allow non-compliant batteries and devices to be imported, directly contributing to fire risks. Queensland *must* mirror or directly adopt these national product safety requirements for e-mobility devices and their batteries.

- **Education and Awareness:** NSW is committed to boosting rider and road user education.
    - **Best Practice:** They are exploring online road rules and safety knowledge tests for e-mobility device users (especially under 16s) and updating in-school road safety education programs. Public awareness campaigns on safe usage, storage, and disposal of batteries are also planned.
    - **Relevance to QLD:** This aligns perfectly with our call for comprehensive education from a young age and ongoing public campaigns. Integrating e-mobility safety into the curriculum, as NSW is considering, would be a proactive step for Queensland.
- **Enforcement:** NSW is enhancing enforcement capabilities.
    - **Best Practice:** Authorised officers will check for mandatory certification on devices, and penalties for breaches are significant. NSW Police are responsible for enforcing road transport offences for illegal e-bikes.
    - **Relevance to QLD:** The Queensland Police Service requires stronger, clearer powers and resources to effectively enforce against dangerous riding behaviours and seize illegal, non-compliant devices. This is crucial for deterring misuse.
- **Device Definition and Usage:** NSW is reviewing the definition of e-bikes and proposing rules for e-scooters on shared paths (default 10-20km/h) and roads (20km/h on 50km/h roads or less), with an age limit of 16+.
    - **Relevance to QLD:** While Queensland's existing speed limits for PMDs are similar, the NSW discussion highlights the need for ongoing review of device definitions to ensure they keep pace with technology and for clear delineation of where devices can be used safely. Our position advocates for stronger classification of high-powered e-bikes.
- **Data Sharing:** NSW promotes mandatory data sharing requirements for shared e-mobility operators.
    - **Relevance to QLD:** This is a best practice for all e-mobility operations, as usage data is crucial for informing policy, infrastructure planning, and understanding accident patterns.

8.2. Best Practices from Other Australian States:

- **Victoria:** Following a two-year trial, Victoria has permanently legalised e-scooters (from October 2024), with a maximum speed of 20 km/h, age 16+ requirement, and a strict **prohibition on riding on footpaths**. They must ride on bicycle lanes, shared paths, and lower-speed roads (up to 60 km/h).
    - **Relevance to QLD:** As Victoria's explicit ban on footpath riding is a critical best practice that Queensland should implement for high-density areas, providing a clearer boundary for pedestrian safety. This supports our call for dedicated infrastructure.
- **Western Australia (WA):** Mandates a 10 km/h speed limit on footpaths and 25 km/h on shared paths/local roads, with an age restriction of 16+. Helmets are compulsory.

- **Relevance to QLD:** Consistency in speed limits on shared spaces is important, and WA's lower footpath limit aligns with prioritising pedestrian safety.
- **Tasmania:** Similar to Queensland, 16+ age limit, 25km/h speed limit on shared paths and local roads.
- **Australian Capital Territory (ACT):** E-scooters can be ridden on footpaths (10 km/h), shared paths, and bicycle paths (25 km/h). Helmet is mandatory.

8.3. International Trends & General Best Practices:

- **Graduated Licensing & Training:** Many international jurisdictions are moving towards tiered licensing systems based on device power and rider age, coupled with mandatory training. This includes countries in Europe and cities in North America.
- **Dedicated Infrastructure:** A strong global trend towards investing in separated cycling and e-mobility infrastructure (e.g., segregated bike lanes, wider shared paths with clear markings) to minimise conflict with pedestrians and motor vehicles.
- **Enforcement Technology:** Utilisation of technology like geo-fencing for shared e-mobility schemes to automatically limit speeds in sensitive areas (e.g., pedestrian-only zones, school zones) and to manage parking.
- **Public Awareness & Education:** Continuous and targeted public campaigns on safe riding behaviours, rules, and device limitations, often leveraging social media and digital platforms.

9. Issues the Chamber Should Actively Support (with Reasons)

Beyond our core recommendations, the Chamber actively support and advocate for the following to further enhance e-mobility safety and integration in Queensland:

- **Establishment of a dedicated E-mobility Safety and Integration Taskforce/Working Group:** This taskforce should be established as a permanent body, involving senior representatives from TMR, QPS, QAS, QFES, Department of Education, local government (e.g., Gold Coast City Council), disability advocacy groups, e-mobility industry (manufacturers, retailers, shared scheme operators), and community members.
  - *Reason:* This provides a crucial forum for ongoing dialogue, rapid response to emerging issues, data sharing, evaluation of policy effectiveness, and agile adaptation to technological changes. This fosters true collaboration and shared responsibility, as advocated by multiple stakeholders.
- **Funding for Research & Development into Safer Device Technologies and Infrastructure Solutions:** Invest in local research and development initiatives focused on enhancing inherent safety features in e-mobility devices (e.g., improved braking systems, stability features, integrated lighting), and innovative infrastructure solutions tailored to Queensland's urban environments.

- *Reason:* While regulation is key, encouraging and investing in safer device design at the manufacturing level offers a fundamental solution to reducing accident severity and enhancing user experience.

- **Public Awareness Campaigns on Lithium-Ion Battery Safety:** Implement specific, targeted, and multi-lingual campaigns that educate consumers on the critical importance of safe charging, storage, and disposal of lithium-ion batteries used in e-mobility devices, directly aligning with the new NSW safety standards and ACCC guidance.
  - *Reason:* This addresses a critical, potentially catastrophic risk to property and lives, which is often overlooked by consumers. Proactive education can prevent devastating fires and ensure proper waste management.
- **Comprehensive Review of Fines and Penalties:** Conduct a thorough review of current fines and penalties for dangerous e-mobility behaviours (e.g., excessive speed, mobile phone use, tandem riding, unregistered devices) to ensure they are sufficiently deterrent and commensurate with the risks posed to public safety.
  - *Reason:* Consistent and meaningful penalties provide a clear deterrent for unsafe actions and empower enforcement agencies to act effectively.
- **Pilot Programs for Designated E-mobility Parking Hubs and Clear Signage:** Support trials for clearly designated parking areas for PMDs and e-bikes, particularly in high-density urban areas, tourist hotspots, and near public transport hubs. These hubs should be co-designed with disability advocates to ensure accessibility.
  - *Reason:* Disordered parking creates accessibility issues and hazards for pedestrians (e.g., blocking footpaths, obstructing access ramps), detracting from the overall positive impact of e-mobility and negatively impacting businesses. Clear signage and designated parking improve urban amenity and safety.
- **Data Collection and Reporting Standardisation:** Mandate standardised data collection and reporting on e-mobility incidents (including device type, rider age, injury type, location, and contributing factors) from emergency services, hospitals, and shared mobility operators.
  - *Reason:* Reliable data is fundamental for evidence-based policy making, identifying high-risk areas, and evaluating the effectiveness of safety interventions.

Conclusion

The Gold Coast Chamber of Commerce, in collaboration with local residents, unequivocally supports the advancement of e-mobility in Queensland for its significant benefits. However, we stress that this progress must not come at the expense of public safety. The current trajectory of increasing incidents, the proliferation of illegal devices, and mounting community concerns demand a more robust, integrated, and forward-thinking regulatory response.

Our recommendations for tiered licensing, enhanced safety gear, device standards, stringent retail controls, dedicated infrastructure, and comprehensive education are grounded in

practical experience and informed by the best practices emerging from other Australian jurisdictions. We believe these are achievable insights that, when implemented through a truly collaborative effort involving all levels of government, emergency services, businesses, and the community, will create a safer and more harmonious environment for all road and path users.

The time to act is now. These changes are vital to protect our community and to ensure that Queensland's e-mobility ecosystem is safe, responsible, and prepared to support the successful hosting of the 2032 Olympic and Paralympic Games and beyond.

We urge the State Development, Infrastructure and Works Committee to give serious consideration to these recommendations.

Yours sincerely,

Gary Mays

Secretary Gold Coast Chamber of Commerce

Office Address: 8/465 Oxley Drive | Runaway Bay | Qld 4216
Postal Address: PO Box 1359 | Paradise Point | Qld 4216
Phone 1300 765 057
Email: secretary@gcncc.org.au