

Inquiry into e-mobility safety and use in Queensland

Submission No:	1179
Submitted by:	Reuben Richardson
Publication:	Making the submission and your name public
Attachments:	See attachment
Submitter Comments:	

30th June 2025

Dear Committee Members,

The current legislation appears to be discriminatory and bad for the environment as you are encouraging people to move from PMD's to cars for commuting longer distances that is well within the PMD's range and riders capabilities.

I refer to correspondence with the previous ministers team via email dated 30th June 2023.

With reference to the below excerpt from the letter:

"Unlike PMD riders, bike riders also have full access to the road network and generally make use of roads in areas where there is likely to be a high level of interactions with pedestrians. Comparatively, PMD riders are limited to using footpaths in most areas".

I note that your legislation is predominantly about PMD / pedestrian interactions. i.e. keeping pedestrians safe which I think is a noble ideal.

However, can you please explain why Australian's who ride PMD's are being discriminated against on using roads and bike lanes based on the road speed compared to bikes?

Isn't the safest way to reduce the amount of possible interactions with pedestrians is removing the hazard?

Why would you then be **fining people for riding on pedestrian free bike lanes** and asking them to ride on footpaths where they can run into people?

Most separate bike lanes are on 60km/hr streets. This discourages the most obvious use case, riding a PMD to work long distances on relatively safe lightly used bike lanes.

PMD's would like to be on the road / bike lane and not the footpath to travel faster than 12 km/hr.

Regarding deaths, I refer to the following excerpt from the same letter:

"Since 2018, 10 lives have been lost in incidents involving PMDs in Queensland"

- On average that would imply 2 people dying a year from incidents involving PMD's.
- In comparison, 10 people a year die from bicycle related deaths (6000 injuries).
- ~280 people die a year from car fatalities in QLD.

The death toll is significantly less than bicycles / cars, so why the discrimination? Why discriminate across the board with no consideration for the capability of the machine and

capability of the rider? Why encourage people to ride PMDs on footpaths instead of the existing bicycle and road infrastructure?

As raised with the previous government, I recommend the following:

1. Allow PMD's on bike lanes up to roads that are noted as 60km/hr minimum. I can't think of many places we have bike lanes on 50km/hr streets in Townsville.
2. Longer term, I would like to see steps to opening up our bike lanes / bike ways and road and increases in max speeds for high powered PMD's¹. To be treated as equals on the road with bikes and cars. Introduce insurance / licencing / training requirements as required.

Can you please respond specifically to the above two requests / recommendations for consideration. If no, can you please provide supporting documentation justifying the departments position.

Best Regards,
Reuben Richardon

¹ High performance PMD's can easily travel at the posted speed limits. The highest performance electric scooters, unicycles and skateboards can travel at between 60 to 90km/h comfortably with suspension. I think I speak for the collective high performance PMD users when I say we would like to be able to get licenced, our vehicles registered (if required) with appropriate insurances, wearing appropriate protective equipment and treated equally on bike paths and road as other users.

Previous Correspondence

30th June 2023

Honourable Mark Bailey MP
Minister for Transport and Main Roads and Minister for Digital Services.
transportandmainroads@ministerial.qld.gov.au

Dear Ms. Robinson / Mr. Bailey,

I refer to your email dated 30th June 2023. Thankyou for your response.

With reference to the below excerpt from your letter:

“Unlike PMD riders, bike riders also have full access to the road network and generally make use of roads in areas where there is likely to be a high level of interactions with pedestrians. Comparatively, PMD riders are limited to using footpaths in most areas”.

I note that your legislation is predominantly about PMD / pedestrian interactions. i.e. keeping pedestrians safe which I think is a noble ideal.

However, can you please explain why Australian's who ride PMD's are being discriminated against on using roads and bike lanes based on the road speed compared to bikes?

Isn't the safest way to reduce the amount of possible interactions with pedestrians is removing the hazard?

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capability of the rider? Why encourage people to ride PMDs on footpaths instead of the existing bicycle and road infrastructure?

The current legislation appears to be discriminatory and bad for the environment as you are encouraging people to move from PMD's to cars for commuting longer distances that is well within the vehicles and riders capabilities.

As noted previously, I recommend the following:

1. Allow PMD's on bike lanes up to roads that are noted as 60km/hr minimum. I can't think of many places we have bike lanes on 50km/hr streets in Townsville.
2. Longer term, I would like to see steps to opening up our bike lanes / bike ways and road and increases in max speeds for high powered PMD's¹. To be treated as equals on the road with bikes and cars. Introduce insurance / licencing / training requirements as required.

Can you please respond specifically to the above two requests / recommendations for consideration. If no, can you please provide supporting documentation justifying the departments position.

Looking forward to hearing from you.

Best Regards,
Reuben Richardson

Principal Engineer, PEng, CPEng, RPEQ, MIEPNG, Reg. Eng.

North Queensland Engineering

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E: [REDACTED]

W: www.nqeng.com.au

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Previous Correspondence



Our ref MC134856

30 June 2023

Department of
Transport and Main Roads

Mr Reuben Richardson
[REDACTED]

Dear Mr Richardson

I refer to your email of 15 June 2023 to the Honourable Mark Bailey MP, Minister for Transport and Main Roads and Minister for Digital Services, about the implementation and enforcement of Personal Mobility Devices (PMDs) rules in Townsville. The Minister has asked that I respond on his behalf.

PMDs represent a broad range of innovative transportation devices. The most common PMD is an e-scooter. Other examples include e-skateboards, solo wheels and Segways. These devices are designed for use by a single person and are often used for recreation and commuting.

Queensland has been a national leader in its approach to regulating and enabling safe PMD use. Since Queensland first introduced rules for PMD use, most Australian jurisdictions have implemented similar frameworks for these devices.

The Queensland Government supports the use of PMDs provided they are used in a safe and respectful manner. This is why it was critical that Queensland provided a regulatory framework for the safe use of these devices. User compliance with the rules is essential to achieving this.

Public consultation has found that speed is one of the main reasons other path users feel unsafe around PMDs. Additionally, speed is one of the main contributors to PMD injuries and deaths, and the use of PMDs at very high speeds on paths and roads poses a higher safety risk, namely to the riders themselves. As such, tougher penalties have been introduced to crack down on riders using their devices at very high speeds, whilst simultaneously penalising riders using pedestrian infrastructure at speeds that are too high for a shared environment. Since 2018, 10 lives have been lost in incidents involving PMDs in Queensland.

Queensland Police Service (QPS) have conducted a number of high-visibility enforcement operations targeting PMD riders in recent months and intend to continue with such operations to support implementation of the PMD rules. Most offences carry a \$143 fine. Fines are higher for riding on a prohibited road (\$172), speeding (up to \$575), using a mobile phone (\$1,078) and drinking liquor while riding (\$431).

Data has shown that, prior to reforms coming into effect on 1 November 2022, the average speed of e-scooters travelling on paths was 11.5 km/hr. This indicates that PMD riders consistently chose to travel at slower speeds while on footpaths. Setting a 12 km/h limit sends a clear message about how to safely interact with pedestrians on footpaths and shared paths. This also strikes a balance between pedestrian safety and the need for users to maintain a minimum speed to avoid other issues such as losing balance.

It is not proposed to expand the new rules delivered as part of the PMD reforms to bike riders. Bikes and PMDs share many similar characteristics, and both are valued for the important contribution each makes to developing a sustainable and effective transport system. Both PMDs and bikes generate significant benefits for health, the environment and tourism, as well as positive local impacts in connecting communities.

The new rules for PMDs are substantively similar to those for bikes, but with some important differences. Unlike PMDs, bikes are solely human powered vehicles. Even e-bikes, which only offer electric power assistance, are still primarily powered by pedals. As PMDs are solely powered by a motor, they are subject to more stringent regulation.

Unlike PMD riders, bike riders also have full access to the road network and generally make use of roads in areas where there is likely to be a high level of interaction with pedestrians. Comparatively, PMD riders are limited to using footpaths in most areas.

The Department of Transport and Main Roads (TMR) is not aware of issues arising between bike riders and pedestrians in shared spaces to the same degree that problematic interactions between PMDs and pedestrians have been highlighted through public consultation in recent times. Data from traffic surveys prior to 1 November 2022 has also shown that bike riders travelling on footpaths consistently travel at lower speeds than PMD riders on footpaths.

Despite this, bike riders are still required to navigate shared environments in a similar manner to PMD riders – giving way to pedestrians and keeping to the left of the path. This will typically require riders to travel at a low speed. It is critical that all road and path users navigate shared environments with respect and consideration for their fellow users to ensure a safe environment for all.

While TMR are responsible for the administration of the Queensland Road Rules, QPS are responsible for enforcement. Specific questions regarding the enforcement of road rules, such as the scenario you have provided, should be directed to QPS. You can contact QPS by attending your local station, or through PoliceLink on 131 444, by email to policelink@police.qld.gov.au or by using the PoliceLink app.

If you require further information, I encourage you to contact [REDACTED]
[REDACTED] by email at [REDACTED]

Yours sincerely

[REDACTED]
Joanna Robinson
Acting General Manager (Land Transport Safety and Regulation)

Reuben Richardson

From: Reuben Richardson
Sent: Thursday, 15 June 2023 6:00 PM
To: [REDACTED]
Subject: PEV Rules - Implementation and Enforcement

Hi Mark,

I am frustrated about these new PMD rules in QLD and there enforcement by QLD Police.

My new employee turned up to work today (1st week) with a \$172 fine for riding an electric scooter on a separate bike lane on a 60km/hr road. I was shocked but from a review of the rules I can see bike lanes on 50km/hr max is legal where bike lanes on 60km/hr roads is illegal (Where are these legal bike lanes? Why does it matter?). He recently moved to Townsville and is a recent immigrant to Australia. He currently has no car and has been travelling around from his home to work with one of the shared electric scooter companies. What a welcome to Townsville. He was told by the officer he should only be riding on the footpath (where you can run into people). Never mind that the max speed is 12km/hr on footpaths (25km/hr max on bike lanes / roads). On a roadbike you can ride at 30-50km/h on the road (if your really fit). Why does he get treated differently?

A few reasons I think these rules need to change:

1. Environment - If our government and we as humans care about the environment we would be encouraging PEV's not making them unusable. These rules push people into cars which use many more resources.
2. Discrimination - These rules proportionally affect young people and people that can't afford cars. People driving cars don't care as these rules don't really affect them.
3. Townsville Youth Crime - In Townsville of all places where kids are daily stealing and burning cars our police are focusing on enforcing people riding 25km/hr on a bike lane on a scooter. 43,000 offences last year in Townville and this is QLD Police's priority?

These laws need to be changed to encourage uptake of all kinds of electric vehicle. This should be a focus. Get people out of cars and commuting on pushbikes, electric bikes, scooters, e-skateboards and EUC's where practicable.

Recommendations:

1. Allow PMD's on bike lanes up to roads that are noted as 60km/hr minimum. I can't think of many places we have bike lanes on 50km/hr streets in Townsville.
2. Longer term, I would like to see steps to opening up our bike lanes / bike ways and road and increases in max speeds for high powered PMD's. To be treated as equals on the road with bikes and cars. Introduce insurance / licencing / training requirements as required.



Offence Details	
Offence:	PMD ride on prohibited road other than as permitted
Location:	CHARTERS TOWERS RD HERMIT PARK QLD 4812

Regards,
Reuben Richardson

Principal Engineer, PEng, CPEng, RPEQ, MIEPNG, Reg. Eng.

North Queensland Engineering

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