

Transport and Other Legislation (Managing E-mobility Use and Protecting Our Communities) Amendment Bill 2026

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Submission to the State Development, Infrastructure and Works Committee

Transport and Other Legislation (Managing E-mobility Use and Protecting Our Communities) Amendment Bill 2026

From: Brisbane Valley Rail Trail Users Association (BVRTUA)

Date: 31/03/2026

Introduction

The Brisbane Valley Rail Trail (BVRT) is Australia's longest rail trail, stretching 161 km through the Ipswich, Somerset, South Burnett and Toowoomba regions. It is a major regional tourism asset, attracting tens of thousands of visitors annually. The trail delivers significant economic benefits to small towns, supports local businesses, and provides profound physical and mental health benefits for Queenslanders and visitors alike. It provides an excellent return on the approx. \$46 million investment by National, State and Local government in the Brisbane Valley Rail Trail over the past 11 years.

The Brisbane Valley Rail Trail Users Association (BVRTUA) is the peak community organisation representing riders, walkers, runners, horse riders, volunteers, and tourism operators who rely on the BVRT. Our work includes trail advocacy, safety education, community events, funding of community projects, and direct engagement with local and state government.

The Brisbane Valley Rail Trail Users Association is the premier event organiser on the Brisbane Valley Rail Trail, organising events such as the annual Brisbane Valley Rail Trail Festival of Cycling and the annual Australia Day ride, as well as many smaller events during the course of the year that are enjoyed by thousands of cyclists, including e-bike riders.

The Brisbane Valley Rail Trail is ebike friendly with top-up charging stations available in every town. Approximately **50% of all BVRT visitors now ride e-bikes**, reflecting global trends in active tourism and accessibility.

E-bikes enable older riders, people with disabilities, and less-fit riders to participate in multi-day regional tourism experiences. Since the introduction of the Transport and Other Legislation (Managing E mobility Use and Protecting Our Communities) Amendment Bill 2026, several interstate visitors have already announced on social media that they intend to cancel their planned BVRT trips due to the proposed licensing and age restrictions.

We acknowledge the serious safety issues associated with **illegal electric motorbikes**—high-powered, non-compliant devices that the Explanatory Notes describe as “illegal motorbikes being used dangerously in public areas” and “often mistaken for e-bikes”. **These devices are a genuine problem and require stronger enforcement.**

But we have to ask the question, how have we gone from promoting and subsidising compliant e-bikes to a full-blown law and order crackdown?

A compliant EN15194 e-bike is simply a bicycle with a little help—no more dangerous than a normal bicycle, and often safer for older riders. In terms of regulation, the Bill does not sufficiently distinguish between these two very different categories of device.

Furthermore, Queensland's Department of Transport and Main Roads maintains that e-bikes which strictly comply with the EN15194 standard (Electric Power Assisted Bicycles - EPAC) are safe, legal, and considered equivalent to traditional bicycles.

Riders of compliant EN15194 e-bikes are not the problem, but they risk having their simple and perfectly innocent enjoyment of cycling disrupted by excessive regulation due to the misconduct of others.

Our submission focuses on four key areas of concern for the BVRT community and regional tourism.

1. The 10 kph speed limit on shared paths
2. A Minimum Age of 16 for Riding E bikes and PMDs
3. The Licence Requirement for Riding an E bike or PMD
4. The Impacts of Mandating Immediate Compliance with EN 15194:2017+A1:2023

1. The 10 km/h Speed Limit on Shared Paths

Impact on Rail Trails

The Explanatory Notes state that the Bill “provid[es] a consistent 10 km/h speed limit for all e-mobility devices on footpaths and shared paths”.

If applied to the BVRT, this would be **unworkable, unsafe, and economically damaging**.

Rail trails are not suburban footpaths. They are long-distance recreational corridors designed for cycling at normal cycling speeds. A 10 km/h limit would:

- Make it difficult for riders to maintain balance on gravel surfaces and/or in windy condition due to insufficient momentum and stability.
- Increase fatigue and risk of falls. (In a recent test conducted by ecoTekk Sunshine Coast with 9 riders aged ~35 years, riding 12 km at the proscribed 10 kph, two riders suffered a fall.)
- Turn a 3-hour ride into a rather boring 7-hour ride
- Render multi-day tourism itineraries unviable
- Disproportionately harm older riders and riders with disabilities who rely on e-assist to maintain momentum
- Make it impossible for riders to enjoy social rides with fellow cyclists on normal ‘analogue’ bicycles.
- Ignore the advice by TMR that “Studies of bicycle operational stability during the last century have shown that a bicycle can become unstable at speeds below 11 km/h”:

https://www.tmr.qld.gov.au/_/media/busind/techstdpubs/cycling/speed-management-on-shared-paths.pdf

The absurdity of a 10 km/h limit on a rail trail is clearly demonstrated in this short and humorous video:

<https://vimeo.com/1177620421?fl=ip&fe=ec>

Need for a Legislative Carve-Out

The Bill lacks a clear definition of a “shared path”, and without clarification, rail trails may be unintentionally captured.

We strongly recommend:

- **A clear exemption for rail trails, or**
- **A definition clarifying that rail trails are not considered to be “shared paths” for the purpose of the 10 km/h limit or**
- **The creation of a ‘shared trails’ classification with its own regulations such as already exist for the BVRT:**

<https://www.tmr.qld.gov.au/BVRT/Need-to-know#onPageHeaderIdentifier3>

Without this, the BVRT risks being regulated as if it were a suburban footpath—an outcome that would devastate regional rail trail tourism.

2. Minimum Age of 16 for Riding E-bikes and PMDs

The Bill introduces “a minimum rider age limit of 16 years” for both EPACs and PMDs.

Impact on BVRT Tourism and Families

Families are one of the largest visitor groups on the BVRT. Many parents hire e-bikes for children aged 12–15 so they can complete longer sections together. Under the Bill:

- Family groups will be unable to ride together
- Youth groups, school groups, and Scouts will be excluded
- Local bike hire operators estimate a **10–15% loss of business**
- Multi-day family tourism—one of the BVRT’s strongest markets—will collapse

A More Balanced Alternative

We support the intent to protect young children from high-powered illegal devices. However, **a compliant EN15194 e-bike is simply a bicycle**. The Explanatory Notes themselves acknowledge that only one fatality in 2025 involved a legal e-bike, compared with eight PMD fatalities and three illegal e-motorbike fatalities.

We recommend:

Allow a minimum age of 14 for riding a compliant EN15194 e-bike on designated rail trails and off-road recreational corridors when accompanied by a parent or guardian. In all other settings, set the minimum age at 16 for riding a compliant EN15194 e-bike.

This approach balances safety with the realities of family tourism and the nature of rail trails.

3. Licence Requirement for Riding an E-bike or PMD

The Bill requires riders to “hold a valid driver licence of any type or class”.

Impact on Tourism and Accessibility

This requirement will disproportionately affect:

- **International visitors** from cycling-centric countries (e.g., the Netherlands, Denmark) who often do not hold a driver licence because they don't own a car.
- **Backpackers and younger travellers**
- **Older riders who have surrendered their licence but remain active cyclists**
- **People with disabilities** who cannot hold a licence but rely on e-assist for mobility

The Explanatory Notes acknowledge that the purpose is to ensure “basic road rule knowledge”, but this is not relevant on a rail trail, which is off-road, low-risk, separated from traffic, and has its own code of conduct.

We support Bicycle Queensland's position that:

Riders of compliant EN15194 e-bikes should not require a driver licence.

Requiring a licence for a bicycle is unprecedented internationally and will significantly reduce visitation to the Brisbane Valley Rail Trail.

4. Impacts of Mandating Immediate Compliance with EN 15194:2017+A1:2023

A further concern is the Bill's requirement that compliant ebikes must meet the new EN 15194:2017+A1:2023 standard.

Furthermore, there is an anomaly in that the Notes only refer to EN 15194.

Electric Bikes Brisbane has advised us that bicycles built to this updated specification are only now entering global supply chains, with only a very small number delivered into Australia to date.

Mandating immediate compliance would therefore render tens of thousands of existing EN 15194-compliant ebikes technically illegal overnight, despite being safe, lawful, and widely used across Queensland.

This would have severe consequences for regional tourism operators—particularly BVRT bike-hire businesses that have collectively invested hundreds of thousands of dollars in high-quality EN 15194 fleets.

These operators would face the impossible choice of replacing entire fleets at enormous cost or ceasing operations altogether, with flow-on impacts for accommodation providers, cafés, shuttle services, and the broader regional economy.

Explicit recognition in the Bill of existing EN 15194-compliant bicycles is essential to avoid unnecessary economic harm and to ensure that safe, legal ebikes already in use remain permitted on the BVRT.

Broader Economic Impact on Regional Queensland

The BVRT is one of Queensland's most successful regional tourism assets. With the current fuel crisis, Queensland looks to be poised for a domestic tourism boom. The Explanatory Notes themselves highlight the importance of tourism as a benefit of e-mobility devices.

However, the Bill—if applied to rail trails—will:

- Reduce visitor numbers

- Harm small towns already struggling economically with the effects of the fuel crisis
- Reduce accessibility for older riders and people with disabilities
- Undermine the State's investment in active tourism infrastructure
- Create confusion and compliance anxiety among visitors

Local bike hire operators estimate a **10–15% reduction in business**, which will flow directly into reduced accommodation, hospitality, and retail spending.

Summary of BVRT Users Association Recommendations

1. **Clarify that the 10 km/h shared-path limit does not apply to rail trails**, or create a specific exemption mechanism.
2. **Allow young people aged 14+ to ride compliant EN15194 e-bikes on rail trails when accompanied by a parent or guardian.**
3. **Remove the licence requirement for riding a compliant EN15194 e-bike**, aligning with Bicycle Queensland's position.
4. **Ensure the Bill clearly distinguishes between legal e-bikes and illegal electric motorbikes**, which are the true source of community concern.
5. Introduce a clear provision so **all existing EN 15194-compliant ebikes remain lawful and usable** on the Brisbane Valley Rail Trail.
6. **Protect regional tourism by ensuring that rail trails remain accessible, practical, and safe for the broad range of visitors who rely on e-assist technology.**

If it could be helpful, I would be only too happy to answer questions about the effect on Brisbane Valley Rail Trail tourism in person.



Paul Heymans, President
Brisbane Valley Rail Trail Users Association Inc.

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Subject: Queensland's New E Bike Laws Will Hurt BVRT Tourism — And Regional Communities Will Pay the Price
Date: Wednesday, 25 March 2026 11:28:59 PM

Queensland's New E-Bike Laws Will Hurt BVRT Tourism — And Regional Communities Will Pay the Price

The Queensland Government's new e-bike legislation was written for crowded city footpaths — not for a 161 km regional tourism asset like the **Brisbane Valley Rail Trail**.

And unless these rules are fixed, the impact on BVRT tourism will be severe.

! A 10 km/h Speed Limit on Shared Paths Makes No Sense on a Rail Trail

The new laws impose a **10 km/h limit on shared paths** — a rule designed for suburban footpaths with prams, dogs, and driveways.

Applying this to a long-distance rail trail is absurd.

It will:

- Slow multi-day tourism to a crawl
- Discourage interstate and international visitors
- Make guided tours and group rides unviable
- Reduce the appeal of the BVRT for recreational riders

No one travels to regional Queensland to ride at walking pace.

! Licence Requirements Will Drive Visitors Away

Requiring a **Class C learner licence** for e-bike riders might suit city traffic, but on an off-road trail it becomes a tourism killer.

It shuts out:

- Visitors from overseas
- Interstate tourists
- Older riders
- People with mobility needs

These are exactly the groups who rely on e-bikes to enjoy the BVRT.

! Banning Under-16s Will Crush Family Tourism

Families are the lifeblood of BVRT tourism.

A blanket ban on under-16s riding e-bikes means fewer family holidays, fewer overnight stays, and less spending in the small towns that depend on trail visitors.

! One-Size-Fits-All Rules Don't Work for Rail Trails

The BVRT is **not** an urban footpath.

It's a major regional tourism driver — and these laws show a complete misunderstanding of how rail-trail tourism works.

Our Message to Government

You asked for community input. You received it.

And then you ignored it.

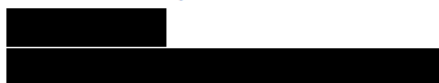
Currently 50% of the traffic on the rail trail is people riding ebikes. These laws will damage regional tourism, hurt local businesses, and make the BVRT less accessible for the very people who keep it alive.

It's not too late to fix this — but only if the government finally listens to the communities who actually use and support the BVRT.

Warm regards.



Paul Heymans, President
Brisbane Valley Rail Trail Users Assoc



Supplementary Submission: Impact of the E-Mobility Bill on People With Disability Using the Brisbane Valley Rail Trail

Submitted by: Brisbane Valley Rail Trail Users Association (BVRTUA) **To:** State Development, Infrastructure and Works Committee **Re:** Transport and Other Legislation (Managing E-mobility Use and Protecting Our Communities) Amendment Bill 2026

1. Purpose of This Supplementary Submission

This supplementary submission addresses a critical issue not fully considered in the current Bill: **the impact of proposed e-mobility regulations on people with disability who rely on adapted e-bikes to access and enjoy the Brisbane Valley Rail Trail (BVRT).**

The BVRT is one of Queensland's most inclusive outdoor recreation assets. It is widely used by people with disability, many of whom depend on **adaptive e-bikes, trikes, recumbents, hand-cycles, and mobility-assist pedal systems** to participate in cycling, maintain independence, and enjoy nature-based recreation.

The Bill, as drafted, risks unintentionally excluding these riders.

2. The BVRT as an Accessible Recreation Corridor

The BVRT is uniquely suited to inclusive riding because it offers:

- A **gentle gradient** suitable for riders with limited strength or mobility
- A **wide, open trail surface** that accommodates trikes, recumbents, and hand-cycles
- A **low-speed, low-conflict environment** compared with urban paths
- A supportive community of riders, carers, and disability advocates
- A safe, car-free environment for people who cannot ride on roads

For many riders with disability, the BVRT is not simply a recreational facility — it is a **lifeline to physical activity, social connection, and mental wellbeing.**

3. How the Bill Creates Barriers for Riders With Disability

3.1 Driving Licence Requirement

Many people with disability who use adapted e-bikes:

- Do not hold a driver licence
- Cannot obtain a licence due to medical conditions
- Have cognitive or neurological conditions that make licensing inappropriate
- Have never driven and rely solely on active mobility devices

Requiring a driver licence to operate a low-risk, pedal-assist mobility device on a regional recreational trail is **incompatible with disability inclusion principles** and contradicts the intent of the Disability Discrimination Act 1992.

3.2 Minimum Age of 16

Many young people with disability use adaptive e-bikes as part of:

- Physiotherapy
- Occupational therapy
- Family recreation
- Social inclusion

A blanket age restriction removes a safe, supported activity that families currently enjoy together on the BVRT.

3.3 Ambiguity Around “Shared Path” Definition

If the BVRT is captured under the “shared path” definition, the **10 km/h speed limit** would:

- Make the trail unusable for many adaptive devices that require momentum for stability
- Increase fall risk for riders with balance or strength impairments
- Prevent carers from safely accompanying riders
- Create frustration and confusion for disability groups who currently ride safely and responsibly

Adaptive e-bikes are **not ridden at high speeds**. They are typically heavier, slower, and used for steady, controlled riding. A 10 km/h blanket limit is not only unnecessary — it is unsafe for this cohort.

3.4 The "Prohibited Bike" Classification and Custom Devices. Adaptive trikes and hand-cycles lack standard factory compliance labels, and prohibiting these custom builds could result in the seizure of essential disability aids.

3.5 Compliance Burden and Stigma

Riders with disability already face social barriers. Introducing licensing, age restrictions, and ambiguous speed rules risks:

- Discouraging participation
- Increasing stigma
- Creating unnecessary interactions with enforcement officers
- Making people feel unwelcome on a public recreation asset designed for them

4. Why Adaptive E-Bikes Are Essential Mobility Devices

For many riders with disability, an adaptive e-bike is not a “recreational gadget” — it is a **mobility aid**.

Adaptive e-bikes enable:

- People with limited leg strength to pedal using electric assistance
- People with balance issues to ride trikes or recumbents
- People with neurological conditions to maintain independence
- Older riders with disability to continue participating in community life
- Carers to accompany riders safely over long distances

These devices are **low-risk, low-speed, and essential for inclusion**.

5. Recommendations

5.1 Exempt Adaptive E-Bikes and Mobility-Assist Cycles From Licensing Requirements

Recognise adaptive e-bikes as **mobility devices**, not motor vehicles.

5.2 Provide a Clear Exemption for Regional Recreational Trails Such as the BVRT

Acknowledge that the BVRT is not a high-conflict urban path and should not be subject to the same rules.

5.3 Replace Blanket Speed Limits With a “Safe Passing Speed” Rule

A “12 km/h when passing pedestrians” rule is practical, enforceable, and safe.

5.4 Allow Under-16 Riders With Disability to Use Adaptive E-Bikes Under Supervision

This supports family participation and therapeutic use.

5.5 Grandfather or Exempt Custom Adaptive E-Bikes from EN15194 Label Requirement

To protect riders relying on custom adaptive e-bikes, the Committee should consider grandfathering existing devices or exempting them from the strict EN15194 factory compliance label requirement. This will ensure continued access without penalising essential mobility aids.

5.6 Consult Directly With Disability Advocacy Groups and Adaptive Cycling Organisations

Policy must reflect lived experience.

6. Conclusion

The BVRT is one of Queensland’s most inclusive public assets. The proposed Bill, while well-intentioned, risks unintentionally excluding people with disability who rely on adaptive e-bikes for mobility, recreation, and wellbeing.

The BVRT Users Association urges the Committee to ensure that **disability access is protected**, and that regional recreational trails remain welcoming, safe, and inclusive for all.

We would welcome the opportunity to provide further evidence or facilitate direct consultation with adaptive cycling users and disability groups who ride the BVRT.