

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

Submission No: 0031
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Dear Committee,

I am writing to provide a submission regarding the proposed eBike legislation currently under consideration, from the perspective of a Noosa-based tourism and outdoor operator (Bike On Noosa and By Earth & Ocean Noosa).

1. Impact on tourism experiences and business operations

The proposed legislation would have a direct and significant impact on our business operations and the tourism experiences we deliver.

A core part of our offering is guided eBike experiences where families — including younger teenagers — can ride together in a controlled, safe environment. These tours are:

- Fully guided by qualified staff
- Conducted with parent/guardian supervision
- Delivered on fully compliant eBikes
- Supported by structured safety briefings and route planning

We currently run 7-10 of these tours per week and have never had on notable safety incident.

Without an allowance for supervised use and clearer definition of shared use path to be high risk pedestrian environments, we would no longer be able to deliver these experiences. This would remove an entire category of our tourism product and eliminate a dedicated full-time role.

These tours are also one of the most accessible ways for visitors to experience regions like Noosa. They align directly with Queensland's focus on low-impact, nature-based tourism, which this legislation risks undermining.

2. Impact on hire and visitor access

The hire side is also significantly impacted, as these experiences are commonly delivered as a family activity with full safety briefings, route guidance, and compliant equipment.

Many of our customers — particularly international visitors — do not hold a driver's licence and rely on bikes and eBikes as a primary way to explore the region.

Restricting access would:

- Limit visitor mobility
- Reduce access to experiences
- Impact how visitors engage with destinations like Noosa

This is distinctly different from app-based, unregulated hire models, yet the legislation does not appear to distinguish between these contexts.

3. Impact on youth coaching and participation

We deliver structured mountain bike coaching programs and work with a large number of young riders, many of whom ride fully compliant eBikes as their only bike.

Under the proposed legislation, these riders would be unable to participate in coaching without being in breach of the law. This would:

- Exclude young riders from supervised environments
 - Reduce opportunities to develop safe riding skills
 - Shift participation into informal, unsupervised settings
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4. Combined impact of path definitions, speed limits, and trail network viability

The combination of a broad definition of "footpath" and a blanket 10 km/h speed limit creates a significant practical issue. As proposed, this limit would apply not only to high pedestrian areas, but also to low-traffic, purpose-built shared paths — including networks such as the Noosa Trail Network, which has received significant government investment to support recreation and eco-tourism.

Under a blanket 10 km/h restriction, these environments would no longer be viable for eBike use in any practical sense — despite being developed in no small part for this purpose.

For both guided tours and general riders:

- 10 km/h is below a functional and stable riding speed
- Riders cannot maintain balance or flow effectively
- Group management becomes difficult

As a result, riders of all ages and abilities will be forced onto roads to travel at a safe and practical speed.

This displaces:

- Families
- Young riders
- Recreational users
- eBike riders

from low-risk environments into higher-risk road settings.

This creates a clear misalignment between government investment in trail infrastructure and the ability to use that infrastructure under the proposed legislation. It also creates inconsistency, as non-assisted bicycles are typically ridden above 10 km/h in the same environments.

5. Enforcement and unintended consequences

It is also important to recognise that many of the issues this legislation seeks to address relate to situations where existing laws already applied but were not effectively enforced.

There is a real risk that the proposed changes will disproportionately impact those who are already operating responsibly — including guided operators, families, and compliant riders — while doing little to change the behavior of those who were previously disregarding the rules.

In effect:

- Responsible, compliant users become restricted
- Structured and supervised activities are limited
- Those already flouting the law may continue to do so

This raises the question of whether the legislation will achieve its intended outcomes or instead shift the burden onto the very users who are contributing positively to safe and responsible riding environments.

6. Recommendations

To achieve safety outcomes while avoiding unintended impacts, the following refinements are recommended:

- Introduce a supervised use exemption for younger riders in guided and coaching environments
 - Provide a licensed operator carve-out for compliant, insured businesses
 - Review the blanket 10 km/h limit and path definitions, adopting a context-based approach
 - Differentiate between controlled hire businesses and unregulated app-based models
 - Align with broader tourism and eco-tourism objectives
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In summary, while the intent of improving safety is supported, the current proposal risks:

- Removing safe, established tourism products
- Eliminating core business operations and employment
- Limiting participation in structured programs
- Reducing accessibility for visitors
- Shifting riders onto higher-risk road environments

A more nuanced approach would better support both safety and participation outcomes.

I would welcome the opportunity to provide further detail if required or if requested present to the committee

Kind regards,

Ben de Vaus
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