

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

**Submission No:** 371

**Submission By:** Sunshine Coast Bicycle Users Group

**Publication:** Making the submission and your name public

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**POSITION PAPER — SUMMARY**

*Queensland Government Acceptance of All 28 E-Mobility Inquiry Recommendations | March 2026*

**SCBUG welcomes many of the 28 accepted recommendations** — particularly on battery safety, import controls, infrastructure investment, and enforcement against illegal high-powered devices.

However, the Government's blanket acceptance of all recommendations, including three that were **widely and strenuously opposed by experts, cycling bodies, and community organisations**, will cause serious harm to law-abiding e-mobility users across Queensland.

The community consultation process was extensive; its outcome suggests it was not genuinely heard. SCBUG summary of concerns -

REC 11	REC 13	REC 14
<i>Classify all e-mobility as motor vehicles</i>	<i>Require a Qld Class C learner licence</i>	<i>10 km/h speed limit on all footpaths</i>
Compliant e-bikes already have a clear legal classification. Reclassifying all devices as motor vehicles — without adding registration, standards compliance or roadworthiness requirements — creates legal chaos, not clarity. It could retrospectively criminalise lawfully purchased devices.	No evidence was presented that compliant e-bike riders are more dangerous than conventional cyclists, who need no licence. The proposal would exclude elderly residents, people with disabilities, international tourists, and low-income earners. London's licence requirement for shared e-scooters suppressed use by up to 8x.	Walking pace is 5 km/h. A 10 km/h limit makes e-bike transport unviable. The Aura–Caloundra footpath route would double in travel time — or push riders onto Nicklin Way and Caloundra Road. Queensland's shared paths and rail trails may also be captured, effectively ending regional e-bike tourism.
<b>X Revise — ensure explicit protections for compliant device owners in any implementing legislation.</b>	<b>X Reject licensing. Age threshold: 12–14 (not 16). Require full Regulatory Impact Assessment first.</b>	<b>X Reject. Consult TMR. Evaluate impact of other measures before imposing any footpath speed limit.</b>

**What SCBUG Supports**

The remaining recommendations represent sound, targeted policy. Key priorities for immediate implementation:

<ul style="list-style-type: none"> <li>• Strict enforcement of existing laws against illegal high-powered devices as motorcycles (Rec 12, 22)</li> <li>• Tighter import and point-of-sale controls (Recs 9, 10, 20)</li> <li>• Major investment in separated e-mobility infrastructure (Rec 4)</li> </ul>	<ul style="list-style-type: none"> <li>• Geofencing for speed management in high-pedestrian zones (Rec 18)</li> <li>• Statewide rollout of rider education including Scoot2School (Rec 28 — expanded)</li> <li>• Better data collection distinguishing legal from illegal device incidents (Rec 3)</li> </ul>
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**SCBUG's call to the Queensland Government:**

Revise Recs 11, 13, and 14 before legislation.

Direct enforcement at illegal devices, not lawful riders. Demonstrate that community consultation was genuine — by listening to what it found.

## POSITION PAPER

### Queensland Government Acceptance of All 28 E-Mobility Inquiry Recommendations

March 2026

**▲ SCBUG's Position:** The Queensland Government has accepted all 28 recommendations from the Parliamentary Inquiry.

SCBUG is deeply concerned that three recommendations — Rec 11, Rec 13, and Rec 14 — will impose disproportionate, harmful, and unworkable restrictions on law-abiding e-mobility users.

Need to redefine the usage of European Standard EN15194 for E bikes under the legislation

We call on the Government to revise these provisions before implementing legislation.

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### Introduction

The Sunshine Coast Bicycle User Group (SCBUG) acknowledges that the Queensland Government's acceptance of the Parliamentary Inquiry into e-mobility safety includes many welcome and overdue reforms.

Measures addressing battery safety, import controls on non-compliant devices, infrastructure investment, and the strict enforcement of existing laws against illegal high-powered devices are sensible, evidence-based, and long overdue.

SCBUG supported these elements in its original submission and continues to do so.

However, the Government's decision to accept all 28 recommendations without qualification means that three deeply flawed recommendations — Recommendations 11, 13, and 14 — will now proceed to legislation.

SCBUG is alarmed by this outcome. These three recommendations were not supported by evidence, were not shaped by the community consultation process, and will cause serious, foreseeable harm to legal e-mobility users across Queensland, including on the Sunshine Coast.

This position paper sets out SCBUG's concerns and our calls for legislative revision.

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### A Consultation Process That Was Not Heard

The Government's decision to accept all 28 recommendations in full is particularly difficult to accept considering the consultation process that preceded it.

Thousands of riders, families, businesses, disability advocates, tourism operators, rail trail communities, and cycling bodies provided detailed, respectful submissions explaining the real-world impacts of these reforms.

Queenslanders participated in good faith, shared data, and offered workable alternatives. The Government's blanket acceptance of every recommendation — including three that were specifically and strenuously opposed by expert bodies — suggests the consultation was treated as a procedural formality rather than a genuine exercise in evidence-based policy-making.

**SCBUG calls on the Queensland Government to demonstrate that consultation means something — by revising the three recommendations outlined below before proceeding to legislation.**

## Sections That Must Be Revised

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### Classifying All E-Mobility Devices as Motor Vehicles

Recommendation 11 proposes that all e-mobility devices with an electrical power source be defined as 'motor vehicles'.

Applied without explicit, unambiguous protections for compliant devices, this single recommendation risks retrospectively criminalising the use of legally purchased, compliant e-bikes and e-scooters that are already lawful under Queensland and national standards.

The root problem is one of enforcement failure, not classification. Compliant e-bikes — limited to 250W and 25 km/h — already exist in a clear legal category. The devices causing the safety concerns that prompted this inquiry are high-powered illegal electric motorbikes that already fall outside this category and should simply be enforced against as motorcycles under existing law. Reclassifying all devices as motor vehicles does nothing to address this without the accompanying infrastructure of registration, compliance standards, and roadworthiness inspection — none of which the recommendation proposes.

SCBUG calls on the Government to ensure any implementing legislation contains explicit, unambiguous protections for riders of compliant, legal e-bikes and PMDs, and that Recommendation 11 does not extend the motor vehicle classification to devices that already meet national compliance standards.

### Licensing Requirements for Legal E-Mobility Riders

Recommendation 13 proposes that riders of compliant e-bikes and PMDs be required to hold at least a Queensland Class C learner licence.

SCBUG strongly opposes this recommendation. It was not supported by evidence at the inquiry, was opposed by the majority of stakeholders who appeared before the committee and will have severe unintended consequences for some of the most vulnerable members of our community.

Those who will be most harmed include:

- Elderly residents who have voluntarily surrendered their driver's licence — the very people who most benefit from e-mobility's accessibility features on hilly coastal terrain.
- People with disabilities who rely on compliant e-bikes and PMDs as an accessible alternative to conventional cycling or car ownership.
- International and interstate tourists — a crucial economic sector for the Sunshine Coast — who could not legally hire or ride an e-bike in the region, including during the 2032 Brisbane Olympics.
- Low-income earners, migrant workers, and international students who use e-mobility as their primary transport and who do not hold, or have not yet obtained, a Queensland driver's licence.

Evidence from comparable jurisdictions is instructive. London's shared e-scooter scheme requires a driving licence; Brisbane's does not. Despite London's significantly superior separated cycling infrastructure, Brisbane's e-scooters are used between twice and nearly eight times more often than London's. Licensing requirements directly suppress uptake, and reduced uptake means more cars, not fewer.

SCBUG calls on the Government to reject the licensing component of Recommendation 13 unless and until a full Regulatory Impact Assessment demonstrates a clear safety case and assesses the impacts on disabled people, elderly residents, tourists, and other disadvantaged groups.

The age threshold component of Recommendation 13 should be set at between 12 and 14 years — consistent with the evidence — not 16.

### 10 km/h Speed Limit on All Footpaths

Recommendation 14 proposes a blanket 10 km/h speed limit on all footpaths for all e-mobility devices. This recommendation appears to have been made without any consultation with the Department of Transport and Main Roads (TMR) on minimum safe cycling speeds — a concern TMR itself flagged in response to public submissions.

Walking pace is approximately 5 km/h. A 10 km/h limit renders any meaningful e-bike journey on a footpath impossible.

For Sunshine Coast riders, this is not a theoretical concern. The route between Aura and Caloundra — a 9 km journey regularly made on the footpath behind Bunnings and along the aerodrome — would either double in time to over an hour, or force riders onto Nicklin Way and Caloundra Road: roads with high traffic volumes, high speed limits, and minimal cycling infrastructure.

There is a further structural problem. Queensland's network of shared paths, riverside paths, foreshore paths, and long-distance rail trails — including the Brisbane Valley Rail Trail — may constitute 'footpaths' under existing legislation.

A 10 km/h speed limit applied across this network would effectively ban legal e-bike commuting and tourism riding across the entire state. This cannot have been the committee's intent, but it may be the unintended consequence.

The practical effect is not safer footpaths — it is more cars on congested roads as riders abandon e-bikes for vehicles. This is the opposite of the Government's stated transport and congestion-reduction objectives.

SCBUG calls on the Government to reject Recommendation 14, undertake proper consultation with TMR and road safety experts, and reserve any decision on footpath speed limits until the impact of other endorsed measures — particularly enforcement of illegal devices — has been properly evaluated.

### Use of European Standard EN15194

Another major issue in the amendments is the definition of what is legal e-bike or EPAC.

Under Clause 63, Section 353B of TORUM an EPAC (Electric Pedal Assist Cycle) is one that explicitly complies with EN15194:2017+A1 which is the current revision of the EN15194 standard.

The bikes that are currently owned by people are EN15194 or EN15194:2017 compliant.

Because they're using the explicit one revision only virtually all of the of the EPACs (as the amendments generally refer to compliant e-bike), in QLD in our garages and being used everyday by Qlder's to get around will become illegal if this is left un-edited.

The legislation needs to be edited to state EN15194 so that it's future proof and backward compatible as the fundamentals of the standard have never changed.

## What Should Happen Instead

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The safety concerns that prompted this inquiry are real. Illegal, high-powered electric motorbikes do pose a risk to pedestrians, path users, and other road users. The answer is enforcement, not punishing the many for the conduct of the few. SCBUG supports the following measures as the appropriate response:

- Strict and properly resourced enforcement of existing laws against illegal high-powered devices, treating them as motorcycles as current law already requires.
- Tighter import and point-of-sale controls to prevent non-compliant devices entering the Queensland market (Recommendations 9 and 10 — supported).
- Significant investment in separated e-mobility infrastructure — the single most effective safety intervention identified by academic research, and a pressing need across the Sunshine Coast given multiple major transport projects currently underway.
- Technology-based speed management in high-pedestrian zones, using geofencing by shared scheme operators (Recommendation 18 — supported), rather than blanket legislative limits.
- Statewide rollout of evidence-based rider education programs, including locally developed programs such as the Sunshine Coast's Scoot2School e-scooter education initiative.
- Mandatory road safety education targeting motorists — who are responsible for the overwhelming majority of serious crashes involving e-mobility riders.

## SCBUG's Calls to the Queensland Government

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The Sunshine Coast Bicycle User Group calls on the Queensland Government to:

- Reject or substantially revise Recommendation 13 (licensing of legal e-mobility riders) and ensure any age threshold is set between 12 and 14, not 16.
- Reject Recommendation 14 (10 km/h blanket footpath speed limit) and consult TMR and road safety experts before introducing any footpath speed restriction.
- Ensure any legislation arising from Recommendation 11 contains explicit, unambiguous protections for riders of compliant, legal e-bikes and PMDs.
- Direct enforcement resources at illegal high-powered motorbikes, not law-abiding e-mobility users.
- Treat the community consultation process with respect — and demonstrate that consultation was genuine — by revising the three recommendations that the evidence, the experts, and the community consistently identified as harmful.

*E-mobility, when used responsibly on compliant devices, is a safe, affordable, and sustainable transport option for Sunshine Coast residents — particularly those who face barriers to car ownership or conventional cycling. The vast majority of riders are law-abiding, contributing members of the community. They deserve policy that supports, not punishes, their choices.*

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For further information, contact:

**Sunshine Coast Bicycle User Group (SCBUG) | [www.scbug.org.au](http://www.scbug.org.au)**

# Recommendation 15

*That the Queensland Government amend legislation to prescribe an offence of riding an e-mobility device on a footpath in the vicinity of a pedestrian without due care and attention.*

## **Alternative Recommendation 15**

*That the Queensland Government amend legislation to:*

- *Require all shared path users to exercise due care and attention toward other users, particularly vulnerable users such as infants, young children and frail older persons*
- *Provide offences for unsafe behaviour by any shared path user that creates risk to others*
- *Apply these provisions consistently to cyclists, e-mobility users, runners and pedestrians*

## **Comment on Recommendation 15**

While the objective of improving pedestrian safety is appropriate and strongly supported, the proposed offence is problematic because it applies only to e-mobility users despite shared paths being environments where safety depends on the behaviour of **all users**, including pedestrians and cyclists.

Conflicts on shared paths typically arise from unsafe interactions rather than from the type of device being used. These may include:

- Unsafe passing behaviour
- Failure to maintain situational awareness
- Unpredictable changes in direction
- Failure to provide warning when approaching
- Pedestrians obstructing safe passage
- Pedestrians failing to control animals

Particular care is especially important where vulnerable users are present, including infants, very young children who may behave unpredictably, and frail older pedestrians whose mobility or reaction time may be limited. Protecting these groups is best achieved through a general obligation on **all** path users to act with due care, rather than placing responsibility on only one category of user.

Creating an offence that applies only to e-mobility riders risks being both ineffective and inequitable because it does not reflect the shared nature of responsibility required to safely accommodate vulnerable users.

A more effective and consistent approach would be to establish a general duty of care applying equally to all shared path users. This would better reflect the reality that safety depends on predictable, attentive and considerate behaviour by everyone using the path, particularly in the presence of vulnerable pedestrians.

## Recommendation 18

*That local governments stipulate that shared scheme operators use technology to prohibit the use, or limit the speed of shared devices to 10km/h or lower in identified high pedestrian zones.*

### Comment on Recommendation 18

This recommendation appears unnecessary as the safety concerns it seeks to address are already covered by earlier recommendations relating to shared path behaviour, signage, and local management of high pedestrian activity areas.

Introducing an additional technology-specific provision risks creating duplication and regulatory complexity without addressing any clearly identified gap. Safety on shared paths is more effectively addressed through consistent behavioural obligations applying to all users rather than through device-specific technological restrictions.

**For clarity and coherence of the regulatory framework, it would be preferable for this recommendation to be removed, with reliance instead placed on the broader behavioural and infrastructure measures already proposed.**

# Recommendation 14

*That the Queensland Government amend legislation to reduce the speed limits on all footpaths, for all e-mobility devices, to maximum 10km/h.*

## **Alternative Recommendation 14**

*That the Queensland Government amend legislation to:*

- *Provide that safety on shared paths be determined by safe interaction between users rather than reliance on a single prescribed maximum speed*
- *Require all shared path users to operate in a safe and predictable manner having regard to pedestrian density, visibility, and available passing space*
- *Provide that unsafe behaviours including unsafe passing, failure to give adequate warning, failure to yield when required, and obstruction of safe passage constitute offences*
- *Recognise that safety obligations apply to all shared path users, including cyclists, e-mobility users, runners and pedestrians*
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## **Why a 10 km/h limit on shared paths is problematic**

### **1. 10 km/h is not a cycling speed – it is a balancing speed**

Most people do not realise this:

A typical bicycle becomes dynamically unstable below about **12 km/hr** for regular riders and perhaps **15km/hr** for the less confident.

Bicycle stability depends on the angular momentum of the wheels - the faster the wheels spin, the more they resist falling to one side or the other - the slower the wheel spins, the less resistance it offers so the less stable the rider becomes.

Below this speed:

- Steering becomes difficult
- Wobbling increases
- Balance requires skill
- Carrying luggage becomes harder

So forcing cyclists toward 10 km/h will actually **increase instability**, especially for:

- older riders
- cargo bikes
- touring bikes
- people with children
- less confident riders

This is a basic **physics** issue, not a behaviour issue.

## **2. 10 km/h is slower than normal human cycling speed**

Typical real-world cycling speeds:

Relaxed rider → 15–18 km/h

Older rider → 14–17 km/h

Commuter → 18–25 km/h

So 10 km/h is not “slow cycling”.

It is **unnaturally slow cycling**.

That matters because when limits are set below natural operating speeds, compliance tends to collapse.

This is well known in road safety:  
Unrealistic limits reduce respect for rules.

## **3. Speed alone is not what determines risk**

Collision risk depends more on:

Relative speed

Visibility

Path width

User density

Shared user behaviour

Not absolute speed alone.

Example:

A cyclist at 18 km/h passing safely with space is safer than one riding 10 km/h weaving unpredictably.

Predictability matters more than raw speed.

#### **4. A key misunderstanding: E-bikes do not automatically travel at 25 km/hr**

Many assume:

E-bike = 25 km/h everywhere.

Reality:

E-bikes only assist *up to* 25 km/h. They commonly travel slower.

Many older e-bike users ride:  
15–20 km/h

Because the motor reduces effort, not judgement.

#### **5. Why very low limits can unintentionally increase conflict**

If cycling becomes impractically slow:

Some riders:  
Move onto roads

This can:  
Increase road risk  
Reduce path usage  
Discourage active transport

Policies should encourage safe use, not discourage use.

#### **6. The real safety factor: pedestrian and cyclist behaviour on shared paths**

Behaviour matters more than absolute numbers.

Clear sight lines and courteous passing matter much more than moderate speed differences. Safety depends on reducing dangerous behaviours

- cyclists who ride at excessive speed on busy shared paths
- cyclists who do not use a bell to warn pedestrians ahead
- dog owners who fail to restrain their animals despite being aware of approaching cyclists
- pedestrians who refuse to create a clear path despite being aware of approaching cyclists

## **7. A more effective safety approach than rigid limits**

Modern path design focuses on:

Context-sensitive speeds.

Meaning:

Crowded areas → slow

Open areas → moderate

Blind corners → caution

This mirrors how roads are managed. Blanket limits often ignore context.

## **8. Why education often works better than very low limits**

Simple behavioural rules often produce better outcomes:

Slow when crowded

Give warning

Pass wide

Yield to pedestrians

These are understandable and enforceable.

A strict 10 km/h limit is difficult to:

Measure

Enforce

Understand

And will not change behaviour except to force cyclists who should not be there back onto our dangerous roads.

## **9. A practical comparison**

Ask:

Would we require cars to travel at walking speed in all suburban streets to prevent accidents?

Instead we manage:

Design

Awareness

Behaviour

The same principles apply to shared paths.

There is clear evidence that appropriately set speed environments, such as 30, 50 and 70 km/h zones in urban areas, reduce death and injury while improving the safety and

livability of residential communities. This demonstrates the importance of applying consistent, evidence-based transport safety policy across all parts of the transport network.

Applying the same principles to shared pathways suggests that any proposed limits should also be supported by clear safety evidence and an understanding of real-world cycling dynamics. A limit that does not reflect these factors risks unintended consequences, including increased instability, conflict between users, and potentially increased injury risk on shared pathways rather than the intended safety benefit.

Ensuring that regulatory changes remain aligned with established evidence-based safety principles also helps protect governments from the risk that well-intentioned but unsupported measures could later be shown to have produced adverse outcomes, with the associated policy and potential legal consequences that may follow.

## **10. A more balanced principle that transport planners use**

Safe shared path use usually aims for:

**“Slow enough to interact safely, fast enough to remain stable and practical.”**

For most bicycles this lies roughly around:  
15–20 km/h in open conditions.

That aligns with natural riding behaviour.

Is it the intention of the Parliamentary Committee that 10km/hr apply to ordinary bikes as well? This inconsistency exposes the absurdity of the proposed limit.

## **11. The key policy question that should be asked**

Not:

“What is the lowest possible speed?”

But:

**“What speed produces the safest and most predictable interactions?”**

Those are not always the same thing.

**Good safety policy matches how people actually move.**

**If limits are set below natural cycling speeds, riders either become unstable or ignore the rule.**

**The safest shared paths are those where behaviour, design, and realistic speeds work together.**

# Recommendation 17

*That the Queensland Government and local governments increase and improve signage of speed limits on footpaths and requirements to give way to pedestrians.*

## **Alternative Recommendation 17**

*That the Queensland Government and local governments increase and improve signage on shared pathways to clearly communicate:*

- *Requirements for cyclists and e-mobility users to give way to pedestrians and operate safely*
- *The shared responsibility of all path users to act predictably with due care and not obstruct the safe passage of others*
- *The obligations of pedestrians to maintain situational awareness and keep animals under effective control so as not to create hazards for other path users*

## **Comment on Recommendation 17**

Improved signage should reflect that safety on shared paths depends on the behaviour of **all users**, not only cyclists and e-mobility riders. While pedestrian priority is appropriate, safety is improved when signage also reminds pedestrians of their obligations to remain aware of other users, avoid obstructing the path, and keep animals under effective control.

Addressing shared responsibilities in this way better reflects the causes of many path conflicts and supports safer and more predictable interactions for everyone, particularly vulnerable users such as children and older pedestrians.

# Recommendation 12

*That the Queensland Government amend state legislation to expressly provide that any device that does not meet the definition of a compliant e-bike or PMD with a top speed which exceeds 25km/h, be defined as a motorcycle, moped or other appropriate classification, and make clear in the legislation that:*

- riders must hold an appropriate class of driver licence, such as a motorcycle licence*
- devices must be sold by a licensed motor trader*
- devices must be registered, and therefore meet Australian Design Standards, have a vehicle identification number (VIN), and be covered by Compulsory Third Party insurance*
- devices must only be ridden on roads, and are prohibited from being ridden on footpaths and bike paths*
- riders must wear a motorcycle helmet that complies with appropriate product safety standards.*

## **Alternative Recommendation 12**

*That the Queensland Government amend state legislation to expressly provide that any device that does not meet the definition of a compliant e-bike or PMD with a top speed which exceeds 25km/h, be defined as a motorcycle, moped or other appropriate classification, and make clear in the legislation that:*

- riders must hold an appropriate class of driver licence, such as a motorcycle licence*
- **new devices must be sold by a licensed motor trader, with provision for private sale of registered second-hand devices subject to normal registration transfer requirements***
- devices must be registered, and therefore meet Australian Design Standards, have a vehicle identification number (VIN), and be covered by Compulsory Third Party insurance*
- devices must only be ridden on roads, and are prohibited from being ridden on footpaths and bike paths*
- riders must wear a motorcycle helmet that complies with appropriate product safety standards.*

## **Comment on Recommendation 12**

While the proposed framework is generally appropriate, the requirement that devices be sold only by a licensed motor trader should apply to the **initial retail sale of new devices**, not to private second-hand transactions.

Provision should instead allow:

- Private sale of registered second-hand devices
- Transfer of ownership through the existing vehicle registration transfer process
- Continuation of registration and Compulsory Third Party insurance requirements

This would align these devices with the existing regulatory treatment of motorcycles and motor vehicles and avoid unnecessarily restricting legitimate private resale.

# Recommendation **23**

*That the Queensland Government review, with a view to strengthening, the existing penalties for offences associated with the most significant risk factors, including riding an illegal device, riding at excessive speed, failure to wear a helmet, riding under the influence of alcohol or drugs, and hooning.*

## **Comment on Recommendation 23 – Helmet penalties**

While strengthening penalties for genuinely high-risk behaviours such as intoxicated riding, use of illegal devices, or reckless riding is supported, the inclusion of helmet offences within this group should be approached with caution, as the issue of compulsory helmet use for low-speed micro-mobility remains contested internationally.

There is evidence from overseas experience that mandatory helmet requirements, particularly for short, low-speed local trips, may reduce participation in cycling and e-bike use. Because cycling and active transport produce well-established population health benefits, reduced participation may result in unintended negative public health consequences that may outweigh the individual protective benefit in some low-risk situations.

International experience, particularly in parts of Europe, suggests a more nuanced behavioural pattern. In the author's extensive experience, cyclists overseas undertaking longer rides, higher speed road riding, or cycle touring invariably wear helmets. However, for short local trips on separated pathways at moderate speeds, helmet use is often discretionary and there is limited evidence that this substantially increases head injury risk in those specific low-risk environments.

There is also evidence that compulsory helmet requirements can act as a barrier to short local trips, particularly spontaneous journeys, thereby discouraging active transport and reducing the associated health and congestion benefits.

This is not to suggest that Queensland's current helmet laws should necessarily be changed in this context. However, the committee should recognise that helmet policy remains an area of ongoing debate internationally, and that stronger penalties may not necessarily produce improved safety outcomes if they discourage low-risk active transport use.

A more effective approach may be to ensure that enforcement and penalties are focused primarily on behaviours that clearly and consistently contribute to serious injury risk, such as intoxicated riding, use of illegal high-powered devices, and dangerous riding behaviour.

# Recommendation 13

*That the Queensland Government amend legislation to provide that:*

- e-bikes and PMDs can only be ridden by individuals aged 16 years and over*
- riders of e-bikes and PMDs be required to hold at least a Queensland Class C learner licence which requires completion of the PrepL online learning and assessment program*
- this requirement does not apply to e-wheelchair and other accessibility device users*

## **Alternative Recommendation 13**

*That the Queensland Government amend legislation to provide:*

- for the classification of compliant pedal-assist e-bikes as bicycles and not require licensing for their use*
- for the application of existing motorcycle licensing and registration requirements to throttle-controlled electric motorbikes and similar devices*
- improved safety outcomes for younger riders through education and awareness measures rather than licensing requirements*

*and recognise that younger riders can safely operate compliant pedal-assist e-bikes, particularly when riding with parents or guardians, and that e-assist can improve safety by allowing children to maintain safe group riding speeds*

## Licensing

While the intent of improving safety outcomes for younger riders is understood and supported, the proposed licensing requirement is misplaced when applied to compliant pedal-assist e-bikes. The recommendation does not adequately distinguish between pedal-assist e-bikes and motor-driven electric vehicles such as throttle-controlled e-motorbikes, which should instead be classified and regulated as motorcycles.

### **1. Licensing is normally applied where vehicles create substantial third-party risk**

Licensing systems are generally reserved for vehicles such as:

- Cars
- Motorcycles
- Heavy vehicles

because they involve higher levels of:

- Mass
- Speed
- Potential harm to other road users

Compliant pedal-assist e-bikes differ because they:

- Are speed limited (typically 25 km/h)
- Require pedalling to operate
- Have similar mass and performance characteristics to bicycles
- Present a risk profile similar to conventional bicycles

If conventional bicycles do not require licensing, a strong safety justification is required to apply licensing to pedelecs that operate in essentially the same way.

## **2. There is limited safety evidence supporting licensing for low-speed micromobility**

A key policy question is whether licensing improves safety outcomes for low-speed vehicles.

International experience suggests:

- Bicycle licensing schemes have generally not improved safety outcomes
- Such schemes often cost more to administer than the benefits achieved
- Enforcement has proven difficult
- Many jurisdictions have discontinued bicycle licensing programs for these reasons

As a result, most countries do not require licensing for bicycles or pedal-assist e-bikes.

## **3. Licensing does not address the main causes of shared path incidents**

Most conflicts involving e-bikes and bicycles arise from:

- Speed differentials
- Path design limitations
- Congestion
- Visibility issues
- Rider behaviour

These are primarily infrastructure and behavioural issues rather than knowledge deficits. Licensing systems test knowledge but do not significantly influence **judgement, courtesy, or environmental awareness**, which are the primary contributors to incidents.

#### **4. Regulatory proportionality should be considered**

Licensing systems involve:

- Administrative systems
- Testing processes
- Compliance monitoring
- Enforcement resources

For a low-risk vehicle category, the cost and complexity of such systems may outweigh any potential safety benefit. A widely accepted regulatory principle is that regulatory burden should be proportionate to demonstrated risk.

#### **5. Licensing may discourage beneficial transport uptake**

E-bikes deliver recognised public benefits including:

- Reduced reliance on cars
- Lower congestion
- Reduced emissions
- Improved population health
- Improved mobility for older persons
- Enabling younger riders to safely participate in family cycling by allowing them to keep pace through pedal assistance

Younger teenagers and children are often able to ride compliant pedal-assist e-bikes safely, particularly when riding with parents or guardians. In these situations, e-assist can improve safety by reducing fatigue and helping maintain safe and predictable group speeds.

The provision of injury-prevention infrastructure (separated cycleways) also supports the safe use of compliant pedal-assist e-bikes by younger school-age riders. Licensing or age restrictions applied to e-bikes may unintentionally restrict younger students from using safe, low-speed active transport options to travel to school, particularly where pedal assistance enables them to manage distance, hills and fatigue. This would be inconsistent with broader government objectives to encourage active school transport, reduce car dependency, and improve child health outcomes. Introducing licensing or age restrictions may therefore create unnecessary barriers to adoption and reduce these transport, health and family mobility benefits without clear safety justification.

## **6. Consistency across similar vehicle types is important**

A key policy consistency question arises:

If licensing is required for pedal-assist e-bikes, why not also require it for:

- Conventional bicycles
- Mobility scooters
- Electric wheelchairs
- Electric skateboards

These devices often operate at similar speeds and in similar environments. Regulation is generally most effective when applied consistently across comparable risk categories.

## **7. Practical enforcement challenges should be considered**

Licensing requirements would require:

- Routine rider checks
- Monitoring of minors
- Management of tourists and visitors
- Additional enforcement resources

Given the relatively low risk profile of pedal-assist e-bikes, enforcement effort may be better directed toward higher-risk transport categories.

## **8. International regulatory approaches do not generally require licensing**

Most jurisdictions with extensive e-bike use, including:

- Netherlands
- Germany
- France
- Denmark

do not require licensing for compliant pedal-assist e-bikes. These countries have significant experience managing high cycling participation and generally regulate e-bikes as bicycles unless they are motor-driven.

## **9. Licensing is more appropriately applied to motor-driven electric vehicles**

Motor-driven electric devices that:

- Operate via throttle
- Can propel themselves independently
- Function as motorcycles in operation

are more appropriately addressed through existing motorcycle classification, registration, and licensing frameworks rather than through new requirements applied to pedal-assist bicycles.

## **Conclusion**

While improving safety among younger riders is an appropriate policy objective, applying licensing requirements to compliant pedal-assist e-bikes is unlikely to deliver meaningful safety benefits and risks creating a disproportionate regulatory burden. A more effective approach would be to maintain the existing treatment of pedal-assist e-bikes as bicycles while ensuring that throttle-controlled electric vehicles are regulated as motorcycles.