

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

**Submission No:** 0448

**Submission By:** Caloundra Residents Association Inc

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23 March 2026

## Feedback on the Queensland Parliamentary Committee Report on E-Mobility

### Exec summary

CRA broadly supports the majority of recommendations, but has significant concerns with recommendations 11, 13 (the licencing aspect) and 14 which, if accepted and implemented, would effectively punish the vast majority of legal e-bike and PMD riders who comply with current laws, create accessibility issues, and significantly increase safety risks by pushing them onto roads, when the focus should be on the existence and operation of illegal devices. The outcome would be a significant negative impact on the uptake and expansion of e-mobility as a mode of transport, which has huge potential community wide benefits.

<b>We support:</b>	<b>We do not support:</b>
<p>The vast majority of recommendations, in particular:</p> <ul style="list-style-type: none"> <li>✓ Improved collection of reliable data to evaluate impact</li> <li>✓ Infrastructure investment (Rec 4)</li> <li>✓ Battery safety and import controls (Recs 6, 9, 10)</li> <li>✓ Non-compliant e-bikes be defined and regulated as motorcycles (Rec 12)</li> <li>✓ Geofencing in high-pedestrian zones (Rec 18)</li> <li>✓ Seizing and impounding of illegal e-devices (Rec 22)</li> </ul>	<ul style="list-style-type: none"> <li>✗ Rec 11: defining all e-mobility devices as motor vehicles</li> <li>✗ Rec 14: 10km/h footpath limit</li> <li>✗ Part of Rec 13: Licencing riders of legal e-bikes</li> <li>✗ Punishing legal e-bikes riders because of the current impact of illegal e-bikes</li> </ul>

### Why it matters for Caloundra

Multiple major transport projects underway within 4km radius make \*now\* the time to integrate safe e-mobility paths that reduce congestion and support cost-of-living pressures. It is important to CRA to keep regulation in line with the risk posed and whilst every death on our roads is tragic, there has been no increase in fatalities from 2024 to 2025 in PMD users despite explosive growth in usage. Additionally, PMDs represent only 2.5% of all road fatalities in 2025. PMDs and compliant e-bikes offer a flexible, affordable and accessible transport alternative to private cars and for people, such as the elderly and disabled, who would be otherwise unable to ride ordinary bikes around our hilly town. CRA is advocating for:

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### Summary of key asks

- a. Reject Recommendation 14 which recommends amending legislation to reduce the speed limits on all footpaths, for all e-mobility devices, to maximum 10km/h.
- b. Reject Recommendation 11 which recommends defining all e-mobility devices as ‘motor vehicles’. Keep compliant e-bikes (with 25 km motor cut off standard) classified as bicycles, maintaining consistent national classification.
- c. Retain normal bicycle access to roads, bike-lanes, shared paths and footpaths, with local government flexibility to set lower limits or signs restricting use in high pedestrian areas.
- d. Reject Recommendation 13 in relation to requiring riders of e-bikes and PMDs to hold at least a Qld Class C learner licence. Consider the benefits and practicalities of a light version of ‘education first’.
- e. Focus and fast-track legislative amendment and enforcement action on illegal devices - where the safety risk and harm is concentrated
- f. Significantly increase investment in fit-for-purpose infrastructure including separated pathways and other road, path and crossing modifications to support safe use.
- g. Strengthen and increase investment in education-first approaches – no reduced barriers to update.

### Introduction

The Caloundra Residents Association (CRA) welcomes the Queensland Parliament’s State Development, Infrastructure and Works Committee report on e-mobility safety and acknowledges that a great number of recommendations – particularly around infrastructure investment, battery safety, and tighter import controls on non-compliant devices.

For many community members, legal e-mobility devices, including PMDs and e-scooters, are a legitimate alternative to a car or a second car. As the inquiry notes they “form a viable and valuable component of the state’s transport system by providing convenient and affordable short trip options, reducing car dependence”.

However, CRA has serious concerns that the report lacks a fundamental understanding of how e-bikes are used and that, if translated into law, the three recommendations of concern, would make e-bikes unviable and discourage uptake of alternatives to car use. With current cost of living pressures, increasing congestion on our roads, and pressures on public car parking, this would be highly undesirable for our transport systems.

This response sets out our key concerns and priorities, and calls on the Queensland Government to reject or substantially revise several of the committee’s core recommendations before proceeding with legislation.

## Key concerns

### 1. A 10 km/h footpath speed limit would make legal e-bikes unviable

**Recommendation 14** of the committee's report proposes a maximum 10 km/h speed limit for all e-mobility devices on all footpaths. The speed limit is so low that it would render riding a compliant e-bike for transport purposes impractical, encourage unsafe situations, and create an enforcement nightmare for Police. For e-bikes, this would be out of step with every other Australian jurisdiction.

Walking pace is approximately 5 km/h; a speed limit of 10 km/h on footpaths would mean e-bike riders are barely faster than pedestrians. As an example, at this speed you would place 100th/198 at the Golden Beach parkrun. The speeds are unrealistically slow and make any meaningful journey impossible. The practical effect would be to ban legal e-bikes from footpaths entirely.

Banning, or effectively banning, e-mobility devices from footpaths may transfer the risk from interactions with pedestrians to interactions with motor vehicles, this would in turn transition the e-mobility rider to become the most vulnerable user on the roads. Care must be taken not to create negative safety outcomes or discourage the shift towards active transport.

CRA is concerned that this will result in negative safety outcomes locally. For example, trips between Aura and Caloundra are often made using the footpath behind Bunnings and along the aerodrome. This 9 km trip would either double in duration from a reasonable 30 minutes to 1 hour due to the proposed speed limit, or force riders onto the roads. Many of the roads in the Caloundra that will be used, such as Nicklin Way and Caloundra Road, have very high traffic volumes and speed limits, and very poor cycling infrastructure. We are concerned that the proposed changes will actually result in increased collisions between cars and bikes creating even further negative safety outcomes.

The proposed speed limit for all e-mobility devices is so low that it has almost no chance of being self-enforcing in most locations. PMDs already have a speed limit of 12 km/h and, anecdotally, we can see that this is not complied with. To make the 10 km/h speed limit credible would take a major police operation across the state for little to no benefit.

A 25 km/h limit (about the maximum speed most people can easily ride a non-electric bike) would likely be much more credible, leading to higher compliance and less need to enforce. This combined with recommendation 18 would still allow for local governments the flexibility to set lower speeds, (or install signage to restrict bikes/PMDs) in high pedestrian areas leading to considered differentiated limits based on pedestrian traffic levels rather than a single impractical universal limit. E-bikes are already limited to 25km/h under motor assistance.

Having said this, we note TMR's response to public submissions was that 'introducing a footpath speed limit for e-bikes would require a clear understanding of the issue to justify regulatory burden.' Safety concerns stem predominantly from illegal devices rather than compliant e-bikes.

CRA thus recommends that this recommendation be rejected and any decision to impose a speed limit on legal e-bikes be reserved until the impact of other endorsed and implemented measures is evaluated. This would help ensure that any decision is evidenced-based and does not confuse the legal devices with the risks currently caused predominantly by users of illegal devices.

## **2. Lack of clear distinction between legal e-mobility from illegal electric motorbikes**

The most serious deficiency in the committee's report has not clearly and consistently differentiated between:

- Compliant, low-powered e-bikes and personal mobility devices (PMDs) that are already legal under Queensland law; and
- High-powered, illegal electric motorbikes that exceed 250W output and 25 km/h – devices that are already illegal and should simply be enforced against as motorcycles.

Much of the public concern driving this inquiry was fuelled by media reports conflating the two categories. The committee has adopted this conflation rather than corrected it. The result is some recommendations which if adopted would responsible users of legal, low-powered devices for the availability and use of illegal machines.

It is unclear to CRA how **Recommendation 11** which recommends requiring all e-mobility devices with an electrical power source by defined as a 'motor vehicle to simplify enforcement' would achieve the aims of the report particularly as does not recommend undertaking the elements of motor vehicle classification that would assist in enforcement, specifically:

- registration
- compliance with vehicle standards
- roadworthiness requirements inspections.

The report does not clearly explain the legal or practical consequences in detail. Classification of e-mobility devices without taking further steps to ensure compliance does nothing for improving safety whilst creating bureaucratic and legal entanglement. This would impose motor-vehicle-grade costs, standards and penalties on low-risk users. Whilst the trend in e-mobility crashes is concerning it is worth keeping perspective that of the 308 people killed on our roads last year 8 were on PMDs, all but one of which involved collision with a motor vehicle. It is CRA's view that it is important to keep the regulation proportionate to the risk of the devices and we believe that this is a gross over-reach.

We understand implementing this recommendation would be out of step with every other Australian jurisdiction.

### **3. Licensing for legal e-mobility riders appears counterproductive**

**Recommendation 13** proposes that riders of compliant e-bikes and PMDs be required to hold at least a Queensland Class C learner licence. CRA opposes this recommendation strongly on the following grounds:

#### **3.1 Constrains accessibility without increasing protections**

Recommendation 13 fails to acknowledge that the vast majority of 16 year olds will complete a learners test shortly after 16 making the requirement redundant. The simple age restriction, as proposed, would achieve 98% of the proposed outcome without the negative impact to accessibility. Furthermore it is unclear how this regulation would be applied to interstate or international tourists or visitors without equivalent tests.

As the inquiry acknowledges there are members of the community, who are unable or not wanting to gain a drivers licence, for which an e-mobility device creates a great benefit. Specifically users that would be impacted by these changes include:

- International/interstate students
- International/interstate tourists
- Elderly, who have voluntarily surrendered their licence
- Migrant workers
- People unable to qualify for a licence.

We understand the knowledge test takes approximately 4-6 hours to complete. It is unclear to us whether all elements are required for e-mobility users and if a light version if required, would be more fit for purpose and assist in address potential accessibility issues.

As a tourist and retirement hub on the Sunshine Coast, CRA has concerns that the impacts to these groups and the effective reduction in mobility has not been properly weighed against the marginal benefit of licensing.

#### **3.2 No evidence base and unreasonable outcomes**

The committee was presented with no credible evidence that riders of legal, low-powered e-mobility devices pose a greater risk than conventional push bike riders – who require no licence. The report does not establish this evidential threshold yet proceeds to recommend a major and unprecedented licensing regime.

Recommendation 13 appears intended to restrict underage access to e-mobility devices and to support enforcement by making riders more easily identifiable. Both aims can be achieved more effectively through direct age limits, targeted enforcement of existing road rules, and (if adopted) simple device registration, without imposing a broad licensing requirement on legal e-mobility riders.

### **3.3 International evidence on licensing**

The experience of London's shared e-scooter scheme is instructive. London's scheme requires riders to hold a driving licence; Brisbane's does not. Despite London's far superior separated infrastructure for e-mobility, Brisbane's e-scooters are used between twice and almost eight times more than London's, depending on the metric applied. Licensing requirements directly suppress uptake.

### **3.4 Damage to Queensland's international reputation**

With the 2032 Brisbane Olympics approaching, tens of thousands of international visitors will expect to use e-mobility to navigate the region. Requiring overseas visitors to produce a Queensland Class C learner licence before riding a hire e-scooter would create an international embarrassment and generate significant negative publicity at precisely the moment Queensland is in the global spotlight.

### **3.5 An potential alternative**

We understand that the evidence suggests that the current regime of fines in the absence of registration and education is ineffective in affecting compliance or reducing the prevalence of injury. The base line therefore for all PMDs and e-bikes should be registration and some form of minimal training/certification. At a CRA meeting earlier this year, our local member, Ms Kendall Morton MP, suggested that might be a recommendation of the committee. This idea has merit as it would enable the easy identification of legal and illegal electric devices – the latter being the main source of safety concerns – and support enforcement measures. A similar free system already exists for PMDs and ensures device compliance with legislation.

While not recommending this as an immediate action, it is worthy of further investigation, as a future option, should other measures, in particular the 16 year age limit (where the majority of hospitalisations occur) and actions regarding illegal devices, not sufficiently address the risks and impacts. This should also be considered as part of national harmonisation, recognising that no other jurisdiction currently registers these e-devices.

## **4. School based recommendation is inadequate**

**Recommendation 28** recommends that the Queensland Government provide guidelines to assist schools to promote safe and compliant riding behaviours and set clear expectations for students travelling to and from school, that inform the school community about any changes to e-mobility regulations, road rules, what are legal devices, and safe riding behaviours. A much more evidence-based and impactful response is required, including statewide access and rollout of funded programs such as the Sunshine Coast-developed Scoot2School e-scooter education program, targeting young riders and their families.

## 5. Key priorities

Beyond the comments made above, CRA broadly supports the other recommendations, noting that these will be subject to further analysis with TMR, road safety and other experts.

CRA considers key priorities for implementation to include:

- Coordinated multi-agency approach encompassing regulation amendment, strengthened enforcement, improved community education and infrastructure investment. (Recommendation 2)
- Working with relevant state and national government agencies, shared e-mobility companies and local government to improve the collection and sharing of data regarding incidents involving PMDs and e-bikes (Recommendation 3), including better distinguishing between legal and illegal devices
- Significantly increased and strict enforcement of existing laws against illegal, high-powered devices, treating them as motorcycles as they already should be under current law.
- Amendment of state legislation to expressly provide that any device that does not meet the definition of a compliant e-bike or PMD be defined as a motorcycle of other appropriate classification with associated requirements. (Recommendation 12)
- Tighter import and point-of-sale controls to prevent non-compliant devices entering the Queensland market (Recommendations 9 and 10) Anti-tampering laws that prohibit the sale and use of modification kits or assistance by retailers to increase power and speed of e-mobility devices. (Recommendation 20)
- Amend laws so Police have sufficient power to seize and impound illegal devices on a first offence. (Recommendation 22)
- Investment in fit-for-purpose separated infrastructure for e-mobility – the single most effective safety intervention identified in academic research on e-mobility. (Recommendation 4). Proven Australian examples include Sydney's protected cycleways, Brisbane's Principal Cycle Network, and Melbourne's Strategic Cycling Corridors. In Caloundra, with multiple major transport projects underway within a 4 km radius, now is the ideal time to integrate dedicated e-mobility paths alongside these investments.
- Technology-based speed management in high pedestrian zones, using geofencing by shared scheme operators rather than blanket legislative limits (Recommendation 18).

## Conclusion

The Caloundra Residents Association (CRA) welcomes the Parliamentary Committee's work examining e-mobility safety and supports the majority but not all of its recommendations.

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CRA calls on the Queensland Government to:

- Reject Recommendation 14 which proposes a 10 km/h blanket footpath speed limit for all e-mobility devices.
- Reject Recommendation 11 requiring all e-mobility devices to be defined as motor vehicles.
- Prioritise enforcement resources at illegal high-powered motorbikes and illegal modified e-scooters, not legal low-powered e-mobility users.
- Significantly increase investment in the infrastructure, education and enforcement measures outlined above that do not create barriers to the beneficial use of legal e-mobility.
- Reject the part of Recommendation 13 which relates to licensing of legal e-mobility riders unless and until a full regulatory impact assessment is completed demonstrating a clear safety case and assessment of impacts on (and exemptions where appropriate for) disabled people, low-income earners, and other disadvantaged groups, and if more appropriate a fit for purpose 'lite' approach adopted.





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[reg IA14573]

Date: 10 April 2026

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

#### **Purpose**

This addendum is provided by the Caloundra Residents Association (CRA) following the introduction of the Transport and Other Legislation (Managing E-mobility Use and Protecting Our Communities) Amendment Bill 2026 (the Bill). It supplements our earlier submission in response to the report recommendations from Inquiry into E-mobility Safety and Use in Queensland.

CRA welcomes the opportunity to clarify how our original concerns relate to the Bill as introduced, and to identify where the Bill appropriately departs from certain Inquiry recommendations, and where further restraint or revision is still required.

#### **Matters CRA supports in the Bill**

CRA reiterates its strong support for elements of the Bill that:

- focus enforcement and regulatory action on illegal high-powered and non-compliant devices,
- provide Police with clear seizure and impoundment powers,
- strengthen accountability in the sale and supply of illegal devices, and
- respond directly to the safety risks that prompted the Inquiry.

In particular, CRA welcomes the Government's decision not to implement Recommendation 11 of the Inquiry, which proposed reclassifying all e-mobility devices as motor vehicles, replacing it with prohibited bike provisions. The recommendation would have had severe and **unintended** consequences for compliant e-bike users and has been appropriately rejected.

CRA notes that these measures align with established active transport and Safe System principles, by targeting the highest-risk behaviours and devices while preserving safe access to low-risk, legal modes of transport that reduce exposure to motor-vehicle trauma and support modal shift.

#### **Outstanding Areas of Concern**

Despite the Bill's positive focus on illegal devices, CRA remains concerned that elements will seriously undermine safe, lawful e-mobility.

#### **1. Blanket 10 km/h Footpath Speed Limit**

CRA remains strongly opposed to the proposed blanket reduction of footpath speed limits for all e-mobility devices to 10 km/h (Inquiry Recommendation 14), despite a lack of evidence that compliant e-bikes pose a significant footpath safety risk.

Such a limit would:

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- make compliant e-bikes less stable at operating speed
- effectively force riders onto higher-risk roads
- disproportionately disadvantage older riders, people with disabilities, non-drivers and one-car households, and
- significantly undermine the role of e-mobility in reducing congestion, parking pressure, transport costs and emissions.

CRA submits that speed regulation for compliant pedal assist e-bikes should be deferred until the impacts of the Bill's strengthened enforcement against illegal devices, and other important non-regulatory actions including education and infrastructure investment, can be evaluated.

Best-practice active transport policy prioritises separation, context-based speed management and localised controls in high-pedestrian environments, rather than blanket statewide limits. Where speed management is required, tools such as geofencing, targeted signage, and design-led infrastructure treatments are more effective and proportionate than uniform low-speed restrictions applied irrespective of context.

Any future consideration of speed limits should therefore be evidence-based, locally responsive and sensitive to pedestrian density and path design, rather than imposed as a single statewide rule.

### **2. Licensing of Legal E-bike and PMD Riders**

CRA continues to oppose the proposal to require riders of compliant e-bikes and PMDs to hold a Queensland Class C learner licence (Inquiry Recommendation 13).

Licensing would create major access barriers for:

- older residents who no longer drive,
- people with disabilities or medical conditions,
- low-income residents,
- students, and
- interstate and international visitors.

Licensing would also create serious and well-documented practical difficulties for visitors and tourism operators, particularly ahead of the 2032 Olympic and Paralympic Games.

CRA submits that there is no evidence demonstrating that riders of compliant e-bikes present greater risk than conventional cyclists, who are not subject to licensing. Introducing such a requirement would significantly suppress uptake of a transport mode that delivers strong public benefits while doing little to address the primary safety risks identified in the Inquiry.

CRA respectfully submits that licensing should not be implemented unless a full Regulatory Impact Assessment demonstrates a clear and proportionate safety benefit, and lighter, education-first alternatives have been exhausted.

### **3. Importance of Regulatory Restraint and Review**

The Bill already equips authorities to address the primary safety risk — illegal, high-powered devices. CRA urges the Government to commit to:

- implementing the Bill's enforcement provisions first
- monitoring outcomes and injury data following their commencement, and
- reviewing the necessity and proportionality of any further regulatory controls based on evidence.

CRA urges the Government to commit to a staged, evidence-based regulatory approach, including:

- implementing the Bill's new enforcement provisions as a priority

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- monitoring outcomes and injury data following their commencement, and
- reviewing the necessity and proportionality of any further regulatory controls based on demonstrated evidence

This approach reflects sound regulatory practice, avoids unnecessary and unwarranted impacts on lawful users, and enables future adjustments to be made transparently and proportionately if residual risks remain.

### Conclusion

CRA supports the Bill's strong focus on illegal and unsafe devices and behaviours and strongly encourages strong action, including increased enforcement and reporting on performance and outcomes.

We respectfully submit that further restraint is required in relation to footpath speed limits and rider licensing for compliant devices, to ensure Queensland's e-mobility reforms enhance safety **without undermining accessibility, affordability and the many significant community benefits of legal e-mobility.**

CRA would welcome the opportunity to provide further evidence to the Committee or engage constructively with the Government as the Bill progresses.

Yours sincerely



Elisa Weiser  
President

