

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

**Submission No:** 0812

**Submission By:** DP Advisory Group

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

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# DP Advisory Group

## *Submission Overview*

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The submission does not oppose the legitimate safety objectives of the Bill. The hospitalisation data is real and the community concern is reasonable. However, the submission argues that several provisions of the Bill, particularly the 10km/h footpath speed limit and licencing requirement are blunt instruments that will impose significant economic, health and equity costs on compliant, lawful users of legal e-bikes, without materially improving safety outcomes for the illegal devices that are the source of community concern.

The Bill mistakes a compliance and enforcement problem for a regulatory gap, and in doing so risks significant unintended consequences for public health, transport equity and economic productivity.

**Over 5 years, this is likely to cost Queensland \$1.051 billion through increased healthcare costs due to inactivity, lost productivity from increased incidence of chronic disease, increased congestion costs, increased environmental impacts and reduced mental health benefits.**

This is accounting for the savings in bicycling infrastructure and the health costs of e-bike incidents.

Evidence shows that 40 per cent of e-bike riders would not change e-bike use for another form of active transport. This is because e-bikes extend the practical range of active transport to people and trips that conventional cycling can't reach, whether due to hills, distance, age, fitness, carrying loads (like children or shopping), or arrival conditions (arriving to work and needing to change). The motor assistance lowers the threshold for who can ride and under what circumstances, making the e-bike a genuinely distinct mode rather than a faster bicycle. Restricting e-bike use will not convert all riders to other forms of active transport; the evidence suggests it will convert a significant portion to car trips, with costs to public health, congestion and productivity.

# *1. The economic cost of the proposed restrictions*

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The Bill has implications for future health, transport and environmental costs beyond the avoided benefits of e-bike incidents.

Active transport investment consistently delivers among the highest benefit-cost returns of any transport expenditure. The WHO's 2025 Promoting Walking and Cycling toolkit documents that active transport projects consistently return between \$5 and \$6 for every \$1 spent, with high-performing schemes returning significantly more. This compares favourably to major light rail projects, which typically return between \$1 and \$2 per \$1 spent.

According to the Australian Institute of Health and Welfare, nearly half of all Australians do not get sufficient physical activity and almost two thirds are overweight or obese. The proportion of Australians with insufficient physical activity remains at 46% despite decades of public health investment. Active commuting, the kind that occurs when a family rides a cargo e-bike to school rather than driving, is one of the most evidence-backed mechanisms for embedding physical activity into daily life without requiring people to find additional time for it.

The WHO estimates that up to 500 million new cases of noncommunicable diseases could be prevented by 2030 through increased physical activity, potentially saving global public health systems up to \$300 billion. Regulation that suppresses active commuting is not neutral from a health expenditure perspective. It shifts costs forward in time and onto the public balance sheet.

The economic costs of displacing Queensland's e-bike users are substantial and accrue across multiple dimensions. In the first year alone, initial cost benefit analysis [modelling](#) estimates total costs of approximately \$226.8 million, dominated by lost productivity from increased chronic disease incidence (\$151.3 million) as modal shift away from active transport drives higher rates of preventable illness. This is compounded by increased public healthcare expenditure (\$15.0 million), private out-of-pocket medical costs (\$8.0 million), motor vehicle congestion costs from riders returning to cars (\$31.5 million), air pollution and associated health damage (\$9.0 million), and reduced social wellbeing and mental health value from lower rates of active commuting (\$12.0 million).

Estimates of the benefits of the Bill, as it currently stand are modest and narrow. In Year 1, total benefits amount to approximately \$9.4 million, comprising reduced e-bike infrastructure maintenance expenditure (\$3.0 million), avoided capital expenditure on charging and parking infrastructure (\$2.2 million) and reduced road safety incident costs associated with e-bike collisions (\$4.2 million). The overall net impact over 5 years, based on this modelling, is a net cost to Queensland of \$1.051 million.

## *2. The Bill conflates legal and illegal devices*

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The provisions of the Bill, including the minimum age, licence requirement and footpath speed limit, apply equally to compliant, legal pedal-assisted e-bikes operating within the 250W/25km/h standard, and to the illegal, high-powered throttle devices that are the source of the safety concerns motivating the legislation.

A cargo e-bike used by a family for school runs, commuting and last-mile public transport connections is a fundamentally different device to an unregistered e-motorbike ridden at speed by a child. Treating them identically in legislation is a category error with significant consequences.

The committee is encouraged to consider whether the Bill's objectives could be achieved more precisely by targeting enforcement action at devices that do not comply with the existing 250W/25km/hr standard (including the current 15km/hr speed limit on footpaths), rather than imposing restrictions on compliant devices.

It should be noted that there is a broad evidence base, including Department of Transport and Main Roads recommendations, that show that riding at 10km/hr on a bike can be highly unstable. This is exacerbated when carrying cargo or children on the bike. For those who persist with riding e-bikes under these conditions, there will likely be more accidents from travelling at low speeds.

## *3. The equity and transport poverty dimension*

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The Bill's restrictions will fall disproportionately on households that rely on active transport as an affordable mobility option, particularly in areas with limited public transport coverage.

According to the Australian Bureau of Statistics, 78% of Australian primary school children aged 5 to 12 live within 2km of their nearest primary school, and a further 16% live within 2 to 5km. Despite this proximity, more than two thirds of children do not walk or ride to school at all in a typical week, and the majority are driven by car. The barriers are not distance but perceived safety and infrastructure. The Bill's provisions will increase rather than reduce those barriers for families willing to make the shift.

Transport poverty, the inability to access work, education and services due to lack of affordable mobility options, is a measurable economic harm. It falls disproportionately on women, who carry a greater share of school drop-off and pick-up responsibility, and on households in areas underserved by public transport. E-bikes, particularly cargo e-bikes represent one of the cheapest and most scalable tools available to address transport poverty. Restricting their use restricts options to extract families from the transport poverty trap.

## *4. The enforcement alternative*

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The community is in consensus for removing dangerous, illegal e-mobility devices from Queensland's shared paths and roads. The evidence base for doing so is clear and the community concern is legitimate.

However, the appropriate policy instrument is enforcement of the existing 250W/25km/h standard, not restrictions on compliant devices. The Bill would benefit from provisions that more precisely target non-compliant devices, including stronger powers to seize and destroy devices that do not meet the existing standard, mandatory compliance labelling enforced at point of sale, and retailer liability for selling non-compliant devices. Several of these provisions are already included in the Bill. The concern is that they are accompanied by restrictions that also penalise lawful users, at the expense of Queensland's health and economy.

## *5. Queensland's Olympic opportunity*

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Brisbane will host the 2032 Olympic Games. Paris used its Olympic moment to transform its streets, building over 1,000km of cycling routes and permanently reallocating road space to pedestrians and cyclists. The committee is encouraged to consider whether Queensland's regulatory settings for e-mobility are consistent with the city's aspirations as an Olympic host and a liveable, sustainable world city.

## *Recommendations*

1. Limit the age restriction, licence requirement and footpath speed limit to devices that do not comply with the existing 250W/25km/h pedal-assist standard, rather than applying them to all e-mobility devices.
2. Strengthen enforcement provisions targeting non-compliant devices at point of sale, import and use, as the primary mechanism for addressing the safety concerns motivating the legislation.
3. Commission a regulatory impact assessment that quantifies the economic, health and equity costs of the proposed restrictions on compliant e-bike users, including the suppression of active transport mode shift.
4. Remove the proposed 10km/hr footpath speed limit with reference to the existing rules governing cyclist behaviour on shared paths and consider whether better enforcement of existing rules is a more proportionate response.

# *Additional* Resources

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[Cost benefit analysis of Queensland's E bike legislation](#)

[Promoting Walking and Cycling toolkit](#)

[Australian Institute of Health and Welfare](#)

[Australian Bureau of Statistics](#)

[The Royal Children's Hospital in Melbourne](#)

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