

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

Submission No: 1318

Submission By: Cycling Without Age Australia Inc

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**Submission to the Queensland Parliament Committees:
Inquiry into Transport and Other Legislation (Managing E-mobility Use
and Protecting Our Communities) Amendment Bill 2026.**

Date: 07/04/2026

From: Cycling Without Age Australia Inc

Introduction

Cycling Without Age Australia (CWAA) welcomes the opportunity to make a submission about the proposed changes to e-bike legislation and regulations in Queensland.

CWAA is a volunteer-based charity dedicated to improving the wellbeing, mental health, and social connection of older people, people living with a disability and anyone with limited mobility, through free trishaw cycling experiences. In Queensland there are 7 chapters of CWAA operational (plus 2 in development), comprised of hundreds of volunteers, providing scores of rides weekly (many thousand rides annually) to vulnerable Queenslanders.

More broadly, we strongly support safe, accessible, and inclusive active transport systems.

Position

We acknowledge and support the Queensland Government's intention to improve safety for all road and path users. We support measures that address the use of illegal and overpowered e-motorbikes, as well as irresponsible rider behaviour that endangers others. Ensuring that shared paths and roads remain safe environments is a goal we strongly share.

However, we do not support several specific measures in their current form due to their likely unintended impacts on accessibility, safety, and inclusion, the risk of reduced uptake of active transport using compliant e-bikes.

Areas of concern

We do not support three specific elements of the proposed legislation, which we believe may lead to unintended negative consequences—particularly for vulnerable and marginalised groups.

1. Requirement for a driver licence or learner permit

CWAA is deeply concerned about and does not support the proposal to require all compliant e-bike users to hold a driver licence or learner permit.

Impact:

This creates a de facto exclusion of:

- older people who have surrendered licences
- people with disabilities or medical conditions unable to obtain a licence
- other individuals legally unable to obtain a licence

Our organisation focuses on cycling as an inclusive activity. Many of the people who benefit most from e-bikes, including older people, people with disabilities and people with medical conditions, are unable to obtain a driver licence but are capable of riding e-bikes safely and responsibly.

For many individuals in these groups, an e-bike is not simply recreational, it is a primary mode of transport and is essential for them to:

- remain socially connected
- access shops and services
- attend community activities
- participate in employment or volunteering

Introducing a licensing requirement would disproportionately exclude these individuals, reduce their independence and increase social isolation. This outcome runs counter to broader public policy goals around inclusion, accessibility, and community wellbeing and is discriminatory in its impact.

Evidence and policy context:

- The World Health Organization identifies social participation and mobility as key determinants of healthy ageing.
- Australian active transport research consistently shows that e-bikes extend participation to people who would otherwise not ride.
- Licensing requirements are not applied to conventional bicycles, despite similar operational risks when used appropriately
- Under Queensland law, compliant e-bikes are treated as bicycles and do not require licensing, registration or insurance.
- The requirement for licencing represents a fundamental policy shift from treating compliant e-bikes as bicycles to treating them as motor vehicles in terms of rider eligibility.

Recommendation:

- Do not amend rider licensing provisions in a way that captures compliant e-bikes, or
- Explicitly preserve the current exemption for power-assisted compliant e-bikes
- Introduce a non-licence-based competency or education model, if safety assurance is required

2. Proposed 10 km/h speed limit on footpaths and shared paths

We do not support this proposal because a blanket maximum speed of 10 km/h on paths is both impractical and potentially unsafe.

Impact:

This is inconsistent with safe cycling dynamics and real-world path use.

- A universal speed cap does not reflect the varying conditions of shared paths. While low speeds are entirely appropriate when pedestrians are present, a fixed limit of 10 km/h in all circumstances is unnecessarily restrictive.

Practical consequences:

- This speed limit would significantly increase compliant e-bike travel times, making them less practical for everyday transport, which is counterproductive to the Governments stated commitment to increasing active transport.
- As a result, riders may feel that they are pushed onto roads to maintain reasonable travel times, exposing them to higher-risk environments and undermining the safety objectives of the legislation.
- Alternatively, they may decide that active transport is no longer viable for them which would be counterproductive for the Governments stated aim of increasing uptake of active transport.
- Unrealistic expectations are likely to lead to reduced compliance and reduced safety.

CWAA-specific impact:

Our volunteers frequently travel to service locations via e-bike and use their e-bikes while volunteering. This measure would materially reduce the practicality of volunteering.

Evidence and policy context:

- The Department of Transport and Main Roads has previously noted that bicycles can become unstable at very low speeds (around or below 11 km/h). A mandated 10 km/h limit may therefore inadvertently increase the risk of accidents.
- International best practice (e.g. Austroads guidance) supports speed moderation based on conditions, not fixed blanket limits.
- Bicycle safety frameworks rely on behavioural rules (due care, yielding) rather than rigid low-speed caps
- Under current law Compliant e-bike riders follow standard bicycle rules, including:
 - giving way to pedestrians
 - riding safely to conditions
 - (no fixed 10 km/h limit currently applies to bicycles on shared paths)
- Introduce a blanket 10 km/h speed limit for compliant e-bikes on shared paths would introduce a new class-specific speed restriction inconsistent with existing bicycle regulation frameworks.

Recommendation:

- Do not insert a fixed speed limit into shared path provisions
- Replace such a speed limit with a “ride to conditions” rule, supported by enforcement of unsafe behaviour.
- Alternatively, introduce context-based speed guidance (e.g. crowded vs clear paths)
- Retain and enforce the existing “**ride safely and give way**” framework

We strongly support the principle of riding to conditions and prioritising pedestrian safety.

3. Enforcement of EN 15194:2017 as the compliance standard

We have serious concerns and do not support the proposal to enforce EN 15194:2017 as the defining compliance standard for e-bikes.

Impact:

This creates unintended exclusion of legitimate devices, including:

- Many currently compliant e-bikes that pre-date this standard would become non-compliant overnight.
- Importantly, EN 15194:2017 does not cover three-wheeled cycles such as trishaws. This would directly affect CWAA’s trishaw fleet and its community support services across Queensland.
- A wide range of adaptive cycles used by older people and individuals with disabilities—such as e-tricycles, recumbent e-trikes, and e-hand-cycles—would also fall outside this standard.

There is a lack of clarity around whether exemptions or alternative compliance pathways will be available, and if so:

- how they will be administered
- how accessible or affordable they will be (especially for older people and people living with disabilities)
- how long approval processes may take

Key risk:

Without clear exemptions, this measure could:

- unintentionally make CWAA operations non-compliant, disrupting or preventing CWAA’s community services across Queensland
- exclude adaptive e-trikes and e-bikes of various kinds used by people with disabilities, discouraging the use of such adaptive e-cycles
- disproportionately impact people who already face barriers to mobility and participation
- create regulatory uncertainty and administrative burden

Evidence and policy context:

- EN 15194:2017 is designed primarily for two-wheeled EPACs (Electrically Power Assisted Cycles)
- It does not adequately cover adaptive or multi-wheel mobility devices

- Inclusive transport policy (including Australian disability frameworks) emphasises universal access and reasonable accommodation
- Under current law, Section 353B of the Queensland Road Rules defines power-assisted bicycles, including:
 - EPACs (aligned with EN 15194 principles)
 - 200W legacy e-bikes
- The proposed change to Mandate compliance specifically with EN 15194:2017 (or updated variants) would:
 - Narrow the definition of compliant devices
 - Potentially override existing broader definitions in s.353B
 - Exclude adaptive and multi-wheel cycles not covered by the standard

Important technical point:

EN 15194 is a product standard, not a comprehensive mobility inclusion standard.

Recommendations:

- Broaden the definition of compliant devices to explicitly include adaptive and multi-wheel cycles, or
- Provide a clear, no-cost, accessible exemption pathway, with:
 - simple application and guaranteed accessibility processes
 - no fees
 - timely approvals
- We note that the current proposal appears to require amendments to the Transport Operations (Road Use Management) Act 1995 and the Queensland Road Rules. We recommend that any such amendments preserve the current classification of compliant e-bikes as bicycles under section 353B and avoid introducing requirements that would effectively reclassify them as motor vehicles.

4. Broader Policy Implications

The combined effect of these measures risks:

- Reduced active transport uptake
- Increased social isolation, particularly among older Australians
- Mode shift to less safe road environments
- Disruption to volunteer and community services

These outcomes would undermine broader Queensland Government objectives in:

- health
- inclusion
- sustainability
- community wellbeing

5. Conclusion

CWAA strongly supports efforts to improve safety and address genuinely unsafe e-bike use. However, we respectfully submit that the three issues outlined above require reconsideration to avoid unintended consequences that may undermine inclusion, accessibility, and community wellbeing.

We recommend targeted amendments to ensure that:

- safety improvements do not unintentionally exclude vulnerable users
- regulation remains practical and enforceable
- Queensland continues to support inclusive, community-based active transport

We would welcome the opportunity to work collaboratively with the Queensland Government to help shape practical, equitable solutions that both enhance safety and preserve access to e-mobility for all members of the community.

Submitter Details

Organisation: Cycling Without Age Australia