

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

Submission No: 1744

Submission By: Electric Bikes Brisbane

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**Submission to the Queensland Minister for Transport and Main Roads
Re: Transport and Other Legislation (Managing E-Mobility Use and Protecting Our
Communities) Amendment Bill 2026**

From:

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Introduction

Electric Bikes Brisbane (EBB) welcomes the opportunity to provide feedback on the proposed amendments to Queensland's e-mobility legislation.

As a specialist retailer with extensive experience in premium electric bicycles (EPACs), servicing thousands of customers across South East Queensland, we broadly support the intent of the proposed reforms. In particular, we recognise the need to improve safety outcomes, reduce the prevalence of illegal and non-compliant devices, and provide clearer enforcement frameworks.

Areas of Strong Support

1. Increased Enforcement Powers for Illegal Devices

EBB strongly supports the introduction of enhanced police powers to seize and dispose of illegal and non-compliant e-mobility devices, particularly high-powered, unregistered electric motorbikes that are currently being misrepresented as e-bikes.

These devices:

- Pose significant safety risks to riders and pedestrians
- Undermine legitimate retailers and compliant products
- Create confusion in the market

The proposed “prohibited bike” framework is a critical step toward restoring clarity and safety in the category.

Key Areas of Concern and Recommended Amendments

1. EPAC Standard Update (EN 15194:2017+A1) – Transition and Clarity

EBB supports alignment with contemporary international standards, including the adoption of **EN 15194:2017+A1**, to ensure consistency with European and emerging national frameworks.

However, we have significant concerns regarding both **clarity and implementation practicality**.

a) Clarification of Standard Application

The transition from the currently recognised EPAC standard (EN15194, as adopted federally in 2012) to EN 15194:2017+A1 requires clearer communication and legislative wording.

Currently:

- Customers are confused about whether their existing compliant e-bikes remain legal
- Retailers face uncertainty when advising customers

We recommend:

- Clear legislative language confirming that **existing EN15194-compliant e-bikes remain lawful if manufactured prior to the commencement date**
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b) Transitional Period – Extend to 12 Months

The proposed **6-month transition period is not practical.**

Key issues:

1. Customer Confusion

Many customers have already purchased compliant e-bikes in good faith. The current proposal creates uncertainty around the legality of these products.

2. Manufacturing Constraints

Compliance with EN15194 standards is:

- Completed at the OEM (manufacturer) level
- Certified through approved testing bodies (e.g. TÜV)
- Not something that can be retrospectively applied by retailers

3. Supply Chain Realities

Global production cycles, certification processes, and shipping timelines make a 6-month adjustment period unrealistic.

Recommendation

- Apply **existing EN15194 standards to all EPACs manufactured prior to 1 July 2026**
 - Extend the transition period to **12 months** to allow:
 - Manufacturers to update production
 - Retailers to manage inventory responsibly
 - Customers to transition with confidence
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2. Distinction Between EPACs and PMDs

EBB does **not support the effective merging of EPACs and PMDs into a single regulatory category**, particularly in relation to speed restrictions and usage environments.

These are fundamentally different devices:

EPACs (E-bikes)	PMDs (Scooters etc.)
Bicycle-based design	Small platform devices
Larger wheels (stability)	Smaller wheels (less stable)
Certified to EN15194 standards	No equivalent certification
Advanced braking systems	Limited braking capability
Pedal-assist operation	Throttle-based or mixed

Key Concern

Applying identical restrictions (e.g. blanket speed limits) does not reflect:

- Differences in stability
- Braking performance
- Intended use cases

3. Footpath Speed Limits (10 km/h)

While EBB supports **targeted speed reductions in high pedestrian areas**, we do not support a **blanket 10 km/h limit across all shared paths**.

Practical Issues:

- Bicycles (including EPACs) are **less stable at very low speeds (e.g. 10 km/h)**
 - Forcing riders to maintain unnaturally low speeds increases risk of:
 - Loss of balance
 - Collisions
 - Riders may be **pushed onto roads without appropriate infrastructure**, increasing exposure to motor vehicle traffic
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Safety Implication

This may unintentionally:

Increase road incidents and fatalities, particularly where **dedicated cycling infrastructure is limited**

4. Need for Clear Definition of “Shared Paths”

The legislation and public communication must more clearly define where reduced speed limits apply.

We recommend explicitly distinguishing between:

Should be included:

- High footfall pedestrian precincts (e.g. Brisbane's South Bank Promenade)
- Dense urban shared zones

Should be excluded:

- Dedicated bike lanes
 - Rail trails
 - Mountain bike trails
 - Low-density shared paths
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5. Speed Definition Clarity (EPAC Operation)

The legislation should clearly define:

“Assisted speed up to 25 km/h”

This is critical to ensure:

- Alignment with EPAC design standards
 - Clear understanding for enforcement and customers
 - Avoidance of misinterpretation between:
 - Maximum assisted speed
 - Rider-generated speed beyond assist
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Conclusion

Electric Bikes Brisbane supports the overarching objectives of the proposed legislation, particularly the focus on safety, enforcement, and the removal of illegal high-powered devices from public spaces.

However, we strongly recommend refinements in the following areas to ensure practical implementation and avoid unintended consequences:

- Extend the EPAC transition period to 12 months
- Provide clarity and protection for existing compliant devices
- Maintain clear distinction between EPACs and PMDs
- Apply targeted, not blanket, speed restrictions
- Clarify definitions of shared paths and speed limits

We would welcome the opportunity to engage further with the Department to support the development of practical, enforceable, and commercially sustainable outcomes for the e-mobility sector in Queensland.

Yours sincerely,

Nick Willis
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Electric Bikes Brisbane