

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

Submission No: 1859

Submission By: Amys Foundation

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Mr Jim McDonald
Chair, State Development, Infrastructure and Works Committee
Queensland Parliament
Cnr of George and Alice Streets,
Brisbane QLD 4000

10 April 2026

Dear Jim,

Amy's Foundation is a national road safety organisation established in memory of Amy Gillett OLY, an Australian cyclist killed by a driver while training with the national team in Germany in 2005. We were the principal advocates behind the introduction of minimum passing distance laws in Queensland and subsequently across all Australian states and territories. Our positioning is explicitly anti-harm rather than pro-cyclist, and we hold all road users to the same standard of accountability.

We welcome this Bill. The enforcement provisions it contains are important, proportionate and overdue, and Amy's Foundation supports them without reservation. Our concerns are targeted and specific.

The harm data in the Bill's own Explanatory Notes makes clear that the problem is concentrated in illegal devices: of 12 e-mobility fatalities in Queensland in 2025, one involved a legal e-bike. The Department of Transport and Main Roads told the inquiry that it was not aware of any significant safety issues with legal e-bike use. Two provisions of the Bill apply a regulatory framework to compliant e-bikes for which there is no demonstrated safety problem: the requirement to hold a driver's licence, and the 10km/h speed limit on shared paths.

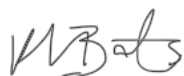
Amy's Foundation is asking the Committee to consider two amendments:

1. Remove the driver's licence requirement for compliant EPACs and consider replacing it with a mandatory cycling competence framework delivered through Queensland schools using infrastructure that already exists and is operating. The licence requirement tests the wrong competencies for the risk identified and has been rejected by every comparable jurisdiction in the developed world, including the United Kingdom, which has operated a no-licence framework for compliant e-bikes since 1983.
2. Remove or raise the 10km/h footpath speed limit for compliant EPACs. The limit is below the minimum safe operating speed for a bicycle identified in the Department of Transport and Main Roads' own design guidelines, and will push compliant e-bike riders from shared paths onto roads where the risk to them is substantially higher.

We are not asking the Committee to weaken this Bill's response to illegal devices. We are asking it to make that response more precise, so that it falls on the devices and behaviours responsible for the harm, rather than on the Queenslanders doing the right thing.

Amy's Foundation would welcome the opportunity to provide in-person evidence to the Committee.

Yours sincerely



Katherine Bates OLY
Managing Director, Amy's Foundation

AMY'S FOUNDATION SUBMISSION TO THE

State Development, Infrastructure and Works Committee

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

1. About Amy's Foundation

Amy's Foundation is a national road safety organisation established in memory of Amy Gillett OLY, an Australian cyclist killed by a driver while training with the national team in Germany in 2005. Our mission is to reduce deaths and injuries to people on bikes on Australian roads, and to do so by improving the relationship between motorists and cyclists, and separating them using law, technology and infrastructure.

The Foundation's positioning is explicitly anti-harm rather than pro-cyclist, we hold all road users to the same standard of accountability. Our work spans enforcement reform, technology-based evidence gathering, behaviour change, and policy advocacy.

The Foundation operates with a consultative governance structure that includes a research and policy sub-committee and an insurance working group, drawing on expertise across road safety research, law and transport policy.

The Foundation was the principal advocate behind the introduction of minimum passing distance laws in Queensland and subsequently across Australia, requiring drivers to give cyclists a minimum of one metre when passing at speeds up to 60km/hr and 1.5 metres above that.

We make this submission in response to the referral of the Transport and Other Legislation (Managing E-mobility Use and Protecting Our Communities) Amendment Bill 2026 to the Committee. We have read the Bill and its Explanatory Notes carefully, and we have reviewed the Committee's Report No. 21 on which the Bill is based. Our submission supports the large majority of the Bill's provisions. It raises specific, evidence-based concerns about a small number of provisions that we believe will not achieve their stated safety objectives and carry meaningful unintended risks, and it proposes alternatives grounded in the Committee's own evidence.

2. Executive Summary

Of the 12 e-mobility fatalities in Queensland in 2025, one involved a legal e-bike. Eight involved personal mobility devices and three involved non-compliant motorbikes. Amy's Foundation submits that the Bill's enforcement provisions correctly identify this as the problem the legislation should solve, and we support them without reservation.

Our concern is that two additional provisions, the driver's licence requirement and the 10km/hr footpath speed limit, apply a regulatory framework to compliant e-bikes for which the government's own evidence identifies no significant safety problem. The harm is concentrated in illegal devices. The contested provisions fall on legal ones.

A compliant EPAC under the Bill's own definition is a 250-watt pedal-assist bicycle whose motor cuts out at 25km/h. It is, by design, construction, and law, a bicycle. The requirement to hold a motor vehicle licence to ride one tests the wrong competencies, excludes people who pose no demonstrated safety risk, and creates a regulatory precedent no comparable jurisdiction has adopted. The 10km/h footpath limit is

below the minimum safe operating speed the Department of Transport and Main Roads identifies for a bicycle, and will push compliant e-bike riders from shared paths onto roads where the risk to them is substantially higher.

The Foundation proposes that the licence requirement be removed, and invites the Committee to consider its replacement with a cycling competence framework delivered through Queensland schools, using infrastructure that already exists and is already operating. We propose that the 10km/h limit either not apply to compliant EPACs, or be raised to align with the Department's own safe operating guidance.

We also raise concerns about the downstream consequences for cycling participation and road safety, Queensland's regulatory isolation internationally, the tension this creates with the Brisbane 2032 active transport legacy, and the energy security context established by the National Fuel Security Plan agreed by National Cabinet on 30 March 2026 and the impact on organised eMTB competition

3. What the Foundation is asking

The Foundation's requests to the Committee are confined to two provisions. Everything else in the Bill has our support.

What we support without reservation:

- The prohibited bike framework: Creating the concept of a prohibited bike, giving police seizure and destruction powers, and establishing offences for riding non-compliant devices in public places
- The drink riding provisions: Random breath testing and new offences for low and mid-range drink riding of e-mobility devices
- The parental responsibility framework: Enforcement action against parents where a child under 16 rides a prohibited or unlawful device
- Retailer accountability provisions: Obligations on shared e-mobility providers and prohibitions on sale of unregistrable motorbikes to children under 16
- The EPAC definition and compliance labelling: Aligning Queensland's definition with EN 15194:2017+A1 and introducing mandatory labels
- The age restriction of 16 years for e-mobility devices

What we are asking the Committee to amend:

1. **Remove the driver's licence requirement for compliant EPACs.** Consider its replacement with a mandatory cycling competence requirement for riders aged 16 and 17, delivered through an established school-based cycling education model. The licence requirement tests the wrong competencies, excludes people who pose no demonstrated safety risk, and has been rejected by every comparable jurisdiction in the world, including the United Kingdom, which has operated a no-licence framework for compliant e-bikes since 1983. The Foundation does not oppose retaining the licence requirement for PMDs, where the risk profile is different.
2. **Remove or raise the 10km/h footpath speed limit for compliant EPACs.** The limit is below the minimum safe operating speed for a bicycle identified in TMR's own design guidelines, and will push compliant e-bike riders from shared paths onto roads where the risk to them is substantially higher. The Foundation supports retaining the 10km/h limit for PMDs, where the pedestrian safety evidence is clear.

4. What the Foundation supports

4.1 The prohibited bike framework

Bill Provision (new s.6 and enforcement framework, TORUM Act as amended): *Creating the concept of a 'prohibited bike' - covering non-compliant EPACs, non-compliant PMDs, and unregistered or unregistrable motorbikes - and establishing offences for riding one on roads, road-related areas, and public places.*

This is critical reform. Non-compliant high-powered devices, misrepresented and sold as legal e-bikes, are the primary source of the harm the inquiry documented. The prohibited bike framework directly targets those devices. Making it an offence to ride one, giving police the power to seize and destroy them, creating rebuttable evidentiary aids for roadside enforcement, and prohibiting their sale to children under 16 are all well-targeted, proportionate, and overdue.

The Foundation notes that the Bill does not appear to close the retail loophole by which non-compliant devices are currently sold with 'for private property use only' labelling. If retailers continued this practice, the prohibited bike framework will address devices already on the street without reducing the rate at which new ones enter the market. The committee should satisfy itself that this loophole is closed.

4.2 Drink riding provisions

Bill Provision (amendments to the PPR Act and TORUM Act): *Allowing random breath testing and introducing new offences for low and mid-range drink riding of e-mobility devices and bicycles.*

The Explanatory Notes report that 19 per cent of hire e-scooter users self-reported riding when probably or definitely over the legal limit. Random breath testing for e-mobility riders is proportionate and enforceable, and the Foundation supports it.

4.3 Parental liability provisions

Bill Provision (parental responsibility framework, TORUM Act as amended): *Enforcement action against parents where a child under 16 rides an e-bike, PMD, or prohibited bike unlawfully, unless the parent proves they did not know or took reasonable steps to prevent it.*

The accountability framework in this provision is consistent with the Foundation's position that harm prevention requires all parties in a system to bear appropriate responsibility. Parents who allow children to ride illegal devices in public spaces have contributed to the harm those devices cause. This provision is appropriately targeted.

4.4 Retailer accountability

Bill Provision (shared provider obligations and sale restrictions, TORUM Act as amended): *Requiring shared e-mobility providers to ensure riders meet age and licensing requirements; prohibiting sale of unregistrable motorbikes to children under 16.*

The Foundation supports supply chain accountability. Retailers who knowingly misrepresent illegal devices as compliant e-bikes are contributing to the harm documented in the inquiry. The provisions addressing this are well-targeted and should be vigorously enforced.

4.5 EPAC definition and compliance labelling

Bill Provision (EPAC definition and compliance labelling, TORUM Act as amended): *Replacing 'power-assisted bicycle' with 'electrically power-assisted cycle' (EPAC), requiring compliance with EN 15194:2017+A1, and introducing mandatory compliance labelling.*

Aligning Queensland's legal definition of a compliant e-bike with the internationally recognised EN 15194 standard provides a clear, enforceable boundary. Mandatory compliance labelling gives police a practical, immediate tool for roadside verification without technical testing. Both provisions are sensible and the Foundation supports them.

4.6 Age restriction of 16 years for e-mobility devices

Bill Provision (age and licensing offences, TORUM Act as amended): *Making it an offence for a person under 16 years of age to ride an EPAC or PMD on roads, road-related areas, and in public places.*

The Foundation's position on the age restriction is more nuanced than our position on the licence requirement. The two are bundled in the Bill as a single provision but they raise distinct issues.

The case for restricting access to powered e-mobility devices for children under 16 is supported by the inquiry's evidence. Children under 16 account for approximately 26 per cent of all e-mobility emergency department presentations. Specialists told the inquiry that most children under 16 do not yet have the cognitive or motor development required to safely operate powered devices in busy road environments, and the harm data is consistent with that. The Foundation accepts this evidence.

Western Australia sets a minimum age of 16 for e-bike riders, in the United Kingdom it is 14. Germany and the Netherlands, which have among the highest e-bike usage rates in the world and the most developed regulatory frameworks, impose no minimum age at all for standard pedelecs, reserving age and licence requirements for the faster 45km/hr speed pedelec class that is more closely comparable to a moped.

The Foundation does not oppose an age restriction of 16 for compliant EPACs. Our concern is with the instrument used to give effect to the restriction for riders aged 16 and over, that is, the requirement to hold a motor vehicle license, not with the age principle itself.

5. The fundamental category distinction: compliant EPACs and prohibited bikes

The Explanatory Notes to the Bill report that of the 12 e-mobility fatalities in Queensland in 2025, one involved a legal e-bike, eight involved PMDs, and three involved non-compliant motorbikes.

The 6,089 emergency department presentations reported to the Queensland Injury Surveillance Unit between 2022 and 2025 are PMD-related presentations, not e-bike presentations. On the first day of the inquiry's public hearings, TMR's Deputy Director-General Geoff Magoffin told the Committee that 'the department is not aware of any significant safety issues with legal e-bike use.' The inquiry's Deputy Chair, Ms Jonty Bush, stated during proceedings that there was no evidence that legal pedal-assist e-bikes were a safety risk.

A compliant EPAC under this Bill's own definition is a 250-watt pedal-assist bicycle limited to 25km/hr motor assistance, certified to EN 15194, and labelled accordingly. It is, in every meaningful respect, a bicycle that has been made easier to ride.

Research published in *The Conversation* by University of Queensland researchers has noted that 250 watts is roughly the sustained output of an avid recreational cyclist, and that professional cyclists routinely produce more than 400 watts. The device the Bill defines as an EPAC is not capable of the speeds or forces that characterise the devices causing the harm the Bill is responding to.

This distinction matters for the submission because it is the basis on which we support the Bill's enforcement provisions and question its licensing and footpath speed provisions. The enforcement provisions are correctly targeted at prohibited bikes.

The licensing and footpath speed provisions apply to compliant EPACs, for which there is no significant evidence of a safety problem. Regulatory burden must be proportionate to demonstrated risk, and the harm data and documented risk is concentrated in non-compliant devices.

6. The licence requirement: wrong instrument and a concerning precedent

Bill Provision (age and licensing offences, TORUM Act as amended): *Making it an offence for a person to ride an EPAC or PMD without a valid Queensland driver licence or non-Queensland driver licence, for any class of vehicle.*

6.1 What the Bill actually requires

The Explanatory Notes clarify that the licence requirement is intended to function as a proxy for basic road rule knowledge, not as a full application of learner licence conditions. There is no requirement for supervision, no L or P plates, and no other young driver restrictions. International and interstate licence holders may ride, which addresses the most acute tourism concern.

What the provision does in practice is this: to ride a compliant e-bike in Queensland, you must hold, or have held, a licence to drive a motor vehicle. If you have never applied for a motor vehicle licence, or if you have surrendered your licence, or if you hold a licence from a country that Queensland does not recognise, you cannot ride a compliant e-bike on a public road or shared path. This is the provision the Foundation is asking the Committee to examine.

6.2 The wrong competence test

The inquiry's own evidence identified a skills gap in young e-bike riders. That gap is about cycling-specific competence, not knowledge of road rules designed for motor vehicle operators. The Committee's hazard perception research found that young e-bike riders identify significantly fewer hazards than adults. Those hazards are predominantly cycling-specific: reading traffic from a vulnerable road position, scanning for opening car doors, anticipating turning vehicles, managing surface conditions at bicycle speeds, and maintaining control while signalling.

PrepL, the Queensland learner driver knowledge test, does not teach or assess any of these skills. It tests road rules designed for people operating enclosed, registered motor vehicles. Passing PrepL does not make a 16-year-old safer on a shared path or a busy road with no cycling infrastructure. The Bill's proposed instrument does not address the problems identified by the committee.

6.3 No comparable jurisdiction in the developed world

The departure from every comparable jurisdiction is significant, and the comparisons are direct.

- United Kingdom: minimum age 14, no licence requirement. The UK's framework for compliant e-bikes has been in place since the Electrically Assisted Pedal Cycles Regulations 1983 — making it one of the longest-standing and most tested regulatory frameworks for e-bikes in the world. It has been reviewed and retained across successive governments for over four decades. In that time, the UK has not found reason to introduce a driver's licence requirement for a compliant pedal-assist bicycle.
- Germany: no minimum age for standard pedelecs (250W/25km/hr), no licence requirement. (The minimum age of 15 applies to S-Pedelecs - the 45km/hr moped class - only. Source: ADAC, Germany's national motoring authority.)
- Netherlands: no minimum age for standard e-bikes (250W/25km/hr), no licence requirement. (The minimum age of 16 applies to speed pedelecs - the 45km/hr class - only. Sources: Rijksoverheid.nl, the official Dutch government website; Gazelle, the Netherlands' leading bicycle manufacturer.)
- Western Australia: minimum age 16, no licence requirement.
- New South Wales (February 2026 reforms, the most substantive state-level e-mobility package in the country): no licence requirement for compliant e-bikes.

The Brisbane Times reported on 24 March 2026 that the only comparable jurisdiction in the world with a licence requirement for standard e-bikes is New Jersey, which became the first US state to introduce one earlier in 2026. The article noted that North Korea requires cyclists to pass a road safety test and display a registration plate, which is a comparison the Queensland Government will likely not find helpful.

If this provision is adopted, Queensland will be one of the most restrictive e-bike jurisdictions in the developed world, applying a framework that has been rejected by every jurisdiction that has examined it on its merits, including the most comparable Australian state with the most recent reforms.

6.4 The road user legitimacy question

The Foundation's concern about regulatory precedent requires some explanation, because it sits at the core of why we regard this provision as more than a technical policy disagreement.

The proposal to require cyclists to hold licences is not new to Australia. No Australian jurisdiction has adopted one. Queensland's own parliament examined the question of bicycle registration in 2013 and concluded that costs far outweighed benefits. The RACQ reached the same conclusion, stating that bicycle licensing is not the solution to road safety concerns. (Queensland Parliament, Report No. 39, 54th Parliament, Inquiry into Cycling Issues, 2013; Bicycle Queensland, Advocacy and Position Statements, citing RACQ position.)

The Class C Learner Licence requirement for compliant e-bikes is not framed as a cycling licence proposal. But its practical effect is exactly that for anyone who uses a compliant e-bike as their primary transport mode. A 250-watt pedal-assist bicycle limited to 25km/hr is not a motor vehicle. Requiring a motor vehicle licence to ride one sets a precedent that has real road safety consequences, not only participation ones.

Australian research on driver attitudes toward cyclists shows that the perceived legitimacy of cyclists as road users is a strong predictor of driver anger and aggressive behaviour. When regulatory frameworks treat cyclists as less legitimate, by imposing requirements on them that apply to motor vehicles, not bicycles, they signal to drivers that cyclists are not entitled to the road on the same basis as other users.

That signal has measurable effects. Drivers who do not perceive cyclists as legitimate road users are more aggressive, give less space, and are more likely to behave dangerously in proximity to them. (Fruhen, L.S. et al., 2019. Driver anger towards cyclists in Australia: Investigating the role of the perceived legitimacy of cyclists as road users. Transportation Research Part F.)

A Danish government-commissioned study found that cyclists on bike paths break traffic laws at a rate of approximately 4.9 per cent, compared to 66 per cent of motor vehicle drivers in comparable studies. (Ramboll, commissioned by the Danish Road Directorate, 2019.) The argument that e-bike riders require a motor vehicle licence to demonstrate road rule knowledge is not supported by the evidence on relative road user behaviour.

6.5 Who loses access

The licence provision excludes specific groups of people who are not responsible for the harm the Bill is responding to and for whom a compliant e-bike represents a legitimate, low-harm transport option.

- People whose medical conditions prevent them from holding a driver's licence but who are fully capable of riding a pedal-assist bicycle. Under the Bill's Explanatory Notes, licence eligibility requires medical fitness to drive a motor vehicle. There is no medical or safety justification for applying that standard to someone riding a device equivalent to a bicycle.
- Older Queenslanders who have voluntarily surrendered their driver's licences but continue to use compliant e-bikes for local transport. This group is not over-represented in the harm data. They will lose access to a transport mode they use safely.
- Young people aged 16 and 17 who have reached the minimum age but have not yet applied for a learner's licence. The provision creates a gap period in which a 16-year-old is old enough to ride a compliant e-bike by age but not yet licenced. The practical response will be that some riders in this group continue to ride unlawfully rather than forgoing transport.
- Visitors who hold a licence from a country not recognised by Queensland's licensing authority. The Explanatory Notes state that international and interstate licence holders may ride, which addresses the most acute tourism concern. However, the provision is narrower than it appears: recognition of foreign licences is not universal and varies by country of origin.
- Elite sport coaches and support staff in the Brisbane 2032 preparation period. E-bikes are standard operational equipment in high-performance sport environments. Coaches across running, triathlon, road cycling and other endurance disciplines routinely use e-bikes to ride alongside athletes during training sessions, providing real-time instruction, carrying equipment, and maintaining consistent pace over distances that would be impractical by other means. In triathlon, a discipline with a strong Queensland competition base, coaches use e-bikes to monitor athletes across transition zones and during run legs. From approximately 2029, Queensland venues will host national and international training camps as teams and individual athletes prepare for the Games and the officials and staff accompanying those teams will include people from countries with lower driver's licence rates and people whose own medical conditions mean they do not hold a licence.
- Paralympic athletes and support staff working with Para-athletes may hold the same conditions that section 8 of this submission identifies as a basis for exclusion under this provision. A licensing requirement that prevents an international coach from riding alongside their athlete on a shared path during a sanctioned training camp is a direct operational impact on elite sport preparation in the host state.

7. The 10km/hr footpath speed limit: a road safety problem, not a road safety solution

Bill Provision: (10km/hr footpath speed limit, Queensland Road Rules as amended): *Providing a consistent 10km/hr speed limit for all e-mobility devices on footpaths and shared paths.*

7.1 What 10km/hr means for a bicycle

The Department of Transport and Main Roads' design guidelines for shared paths state that a bicycle can become unstable at speeds below 11km/hr, and that cyclists can travel safely at between 15 and 25km/hr on well-designed paths with minimum risk or decrease in amenity to people walking. A 10km/hr limit on all footpaths and shared paths is not a safe operating speed for a compliant EPAC. It is below the threshold the Department's evidence identifies as stable.

TMR's website guidance describes average e-bike speeds on shared paths of around 20km/hr, at that speed, a bicycle is inherently less stable and less predictable, not safer.

Independent research published in peer-reviewed engineering literature puts the self-stabilisation threshold at approximately 12km/h (Kooijman et al., 2011; Meijaard et al., 2007; Schwab, 2012), making the case against the 10km/h limit stronger, not weaker, than the Department's own guidance suggests.

7.2 The infrastructure problem in Queensland

Almost all dedicated cycling infrastructure in Queensland is shared paths. Unlike the Netherlands, Denmark, or even parts of Melbourne and Sydney, Queensland has very limited separated cycling infrastructure on key arterial routes. Shared paths are not a supplementary option for most Queensland e-bike commuters. They are the primary infrastructure available.

A 10km/hr limit on shared paths, applied consistently across the state, means that the average e-bike commute doubles in journey time. A journey that takes 20 minutes at a safe 20km/hr takes 40 minutes at 10km/hr. For many commuters, this makes the e-bike an impractical transport choice relative to driving.

This includes purpose-built cycling infrastructure from which pedestrians are expressly excluded, such as the Veloway 1, a 20km dedicated cycleway along the Pacific Motorway, where there is no evidentiary base to justify a 10km/hr limit.

7.3 Where do riders go when they leave paths?

This is the road safety question the Foundation is most concerned about, and feel it has not been adequately examined in the inquiry record.

If a 10km/hr limit makes shared paths impractical for e-bike commuters, the most predictable response is that riders move onto roads. In most parts of Queensland, roads do not have protected cycling infrastructure. The evidence on where cyclists face the greatest harm is unambiguous: interaction with motor vehicles is the primary cause of serious cyclist injury and death. Amy's Foundation was established because of exactly that dynamic.

The inquiry's data records one legal e-bike fatality in 2025. The Foundation is concerned that a provision designed to protect pedestrians on shared paths will shift e-bike riders onto roads where the risk is substantially higher, producing worse outcomes in exactly the category of harm the Foundation exists to address: cyclists killed or seriously injured by drivers.

This is not a theoretical concern. Queensland Injury Surveillance Unit data shows that when PMDs were permitted in bike lanes in November 2022, the proportion of PMD injuries occurring on roads increased from 3.7 per cent to 21 per cent within months. The mechanism by which a footpath speed limit produces road casualties is documented in Queensland's own injury data.

We ask the Committee to consider whether the 10km/hr limit as applied to compliant EPACs should either be removed for that device category, given the absence of evidence that compliant EPACs are a significant hazard on shared paths, or raised to a level consistent with TMR's safe operating guidance.

7.4 PMDs and EPACs are not the same device

The Bill's explanatory notes identify the intent of the 10km/hr limit as protecting pedestrians from the risk posed by e-mobility devices on footpaths. That risk is primarily associated with PMDs, particularly e-scooters, which have small wheels, high centres of gravity, and stand-up riding positions that make them genuinely difficult to control at pedestrian proximity. The Committee's evidence on this point is clear and we do not dispute it.

A compliant EPAC is a different device. It has large wheels, a low centre of gravity, a seated riding position, a design speed matched to the bicycle speed range, and a physical profile that is broadly similar to a conventional bicycle. Applying the same 10km/hr footpath limit to both device types does not reflect the different risk profiles of the two devices.

This conclusion is consistent with the independent assessment of the MAIC-QUT Road Safety Research Collaboration, the body commissioned by TMR to evaluate Queensland's personal mobility device reforms, which submitted to this Committee that the regulatory approaches to PMDs and legal e-bikes should differ, and that legal e-bikes are no more dangerous than conventional bicycles.

8. Compliant e-bikes as legitimate transport: the safety and participation argument

The Foundation's advocacy is grounded in road safety, not in cycling promotion. But road safety outcomes are not separable from road user participation levels, and the evidence on the relationship between cycling participation and overall road safety is robust.

8.1 The safety-in-numbers foundation

The core finding of Jacobsen's 2003 paper in Injury Prevention, which has been replicated and confirmed in multiple subsequent studies across North America, Europe, and Australia, is that the injury rate per cyclist decreases as the number of cyclists increases. The mechanism most supported by subsequent research is that driver behaviour and expectation adapts to the cycling environment. Drivers in cities and on roads where cyclists are common slow down, look more carefully at intersections, and maintain greater awareness of their lateral surroundings. This is not a speculative effect, it is documented across multiple continents and multiple research methodologies.

Marshall and Garrick (2011, Environmental Practice) found that cities with higher bicycle mode shares have significantly lower overall road fatality rates, not just lower cyclist fatality rates. The 13-year longitudinal study by Marshall and Ferenchak (2019, Journal of Transport and Health) confirmed that cities with protected cycling infrastructure had 44 per cent fewer total road deaths and 50 per cent fewer serious injuries than comparable cities without it.

The legitimacy research from Fruhen et al. (2019), conducted in Australia, adds a further dimension to this. The perceived legitimacy of cyclists as road users is a direct predictor of cycling participation and of driver behaviour. As more people cycle, cycling becomes a more normative and expected activity, and this increases perceived legitimacy. The inverse is also true: regulatory frameworks that treat cyclists differently from other road users, applying requirements to them that apply to motor vehicles, reduce their perceived legitimacy and increase the conditions in which aggressive driver behaviour occurs. The road safety argument against the licence requirement is not only about who stops riding, it is about what happens to those who continue.

The policy implication for this submission is that regulatory provisions which reduce e-bike participation do not produce a safety dividend. They shift riders to cars or to roads without cycling infrastructure, reduce the visibility of cyclists on routes where drivers have reason to expect them, and weaken the legitimacy signal that protects all cyclists on Queensland roads.

8.2 E-bikes as a transport mode with specific safety characteristics

The profile of the compliant e-bike rider in the research literature is distinct from the profile of the problematic e-mobility device user the inquiry documented. Research from Germany (published in *BMJ Open Sports and Exercise Medicine*, 2022, studying 1,879 participants over four weeks) found that e-bike riders replace car trips at a higher rate than conventional bicycle riders. People on e-bikes are more likely to use their device for commuting and errands where the alternative is a motor vehicle, rather than for recreation where the alternative is walking or public transport.

This matters because the emissions, congestion, and road safety benefits of replacing car trips with e-bike trips are substantially larger than the benefits of replacing walking or recreation trips. A regulatory framework that reduces e-bike commuting and errands does not simply affect leisure riders, it shifts trips from e-bikes to cars, increasing the volume of the vehicle class most responsible for road deaths in Queensland.

8.3 E-bikes and transport accessibility

The Foundation's concern about equity of access is related to, but distinct from, the road safety argument. The scale of cycling in Queensland is significant: the 2025 National Walking and Cycling Participation Survey found that 759,000 Queenslanders ride a bicycle in a typical week, and 1,829,000 ride at least once in a typical year. E-bike ownership is growing, 8.7 per cent of Queensland households now own one. (CWANZ, National Walking and Cycling Participation Survey 2025, Queensland Report.) TMR's 'Queensland Cycling Strategy' states that every dollar invested in cycling infrastructure returns five dollars in economic benefit.

A licence requirement does not affect this population uniformly. Research by University of Queensland researchers published in *The Conversation* estimated that approximately 340,000 Queenslanders aged 16 and over, around 7.5 per cent of that age group, do not hold a driver's licence. (Buning, R.J., Pojani, D., and Riordan, T., *The Conversation*, 2026.) These are the Queenslanders for whom a compliant e-bike represents a meaningful transport option and who would lose access to it under the Bill's provisions. They include people with medical conditions that preclude motor vehicle licences, older residents who have surrendered licences, international residents and students, and younger adults who have not yet applied. The harm data from this inquiry does not implicate any of these groups.

Cost of living is another relevant factor. A compliant e-bike is significantly cheaper to purchase and operate than a motor vehicle. The licence requirement creates an additional regulatory barrier for this group of users that has no demonstrated safety justification. The harm data from this inquiry does not implicate compliant e-bike commuters. It implicates children on illegal high-powered devices, intoxicated PMD riders, and

motorbike-equivalent non-compliant devices. The people the licence requirement will exclude are not the people the Bill is trying to address.

8.4 Compliant e-bikes and national fuel security

On 30 March 2026, National Cabinet agreed to the National Fuel Security Plan in response to the deepest fuel supply crisis Australia has experienced since the oil shocks of the 1970s. Petrol prices across Australia's capital cities spiked by nearly 50 cents per litre in the weeks prior, reaching around \$2.50 per litre, and over 500 service stations ran out of at least one fuel type. The International Energy Agency explicitly advised Australians to reduce car use and switch to active transport where possible.

A compliant e-bike sits entirely outside this vulnerability; it runs on grid electricity and carries no exposure to imported fuel prices or supply chain disruption. An e-bike commuter doing a 20km round trip spends approximately \$20 per year in electricity. Research published in *The Conversation* found that globally, electric bikes and mopeds are currently displacing four times as much demand for oil as all the world's electric cars combined, precisely because they substitute so effectively for the short car trips that make up close to half of all Australian commuter travel. (*The Conversation*, 2025.)

The committee is being asked to consider two provisions that will make e-bike commuting less practical for Queenslanders, and some of those commuters will return to cars. That is not cost-free in road safety terms, as sections 6 and 7.1 explain, and it is not cost-free in energy security terms at a moment when the federal government has declared a national fuel crisis and the IEA is urging Australians to reduce private car use. Queensland legislation that discourages compliant e-bike commuting is moving in the opposite direction from national energy policy. Those two things should be aligned.

9. Disability, access, and the medical fitness requirement

The Explanatory Notes state that the licence requirement 'ensures that riders of e-mobility devices remain as medically fit as possible, to reduce potential risks to themselves or other road users.' In Queensland, holding a valid driver's licence requires meeting the medical standards for motor vehicle operation.

The Foundation notes that the medical standards for operating a motor vehicle at highway speeds in an enclosed registered vehicle with airbags and crumple zones are not the appropriate medical standards for riding a 25km/hr pedal-assist bicycle. There are conditions that prevent a person from safely driving a car, including some visual field restrictions and certain neurological conditions, that would not prevent that person from safely riding a bicycle. Applying the motor vehicle medical fitness standard to compliant e-bike riders will exclude some people from a transport mode they can use safely.

Under the Disability Discrimination Act 1992 (Cth), restrictions that apply the medical fitness standards of one activity to a different activity without evidence that those standards are relevant to the second activity may be subject to challenge as it raises the question: what is the safety justification for requiring motor vehicle medical fitness to ride a compliant e-bike?

Based on the inquiry's evidence, there is no demonstrated safety case for legal e-bike riders that would justify this standard. The provision is designed to address a problem concentrated in illegal devices and PMD misuse, but its effect falls on a population not responsible for that problem.

10. Impact on organised e-mountain bike competition

The Foundation raises this issue because it has not appeared in the inquiry record and because it represents a downstream effect of the licence provision that will affect participants in sanctioned sporting competition, including junior athletes.

E-mountain bike racing is a fully established competitive discipline in Australia, regulated under AusCycling's Mountain Bike Technical Regulations (2025 edition). AusCycling defines an E-Mountain Bike for competition purposes as a pedal-assist bicycle with a motor that provides assistance only when the rider is pedalling, limited to 250 watts of power and 25km/hr of assisted speed, the identical specification as a compliant EPAC under this Bill. eMTB events are run at state championship and national level under AusCycling's framework, and the discipline has an international competitive structure including a World Cup series run by the International Cycling Union (UCI).

Competitive eMTB riders train on roads, shared paths, and trail access routes in addition to the trail networks where events are held. Junior eMTB categories in Australia include riders aged 16 and 17. Under the Bill's licence provision, a 16-year-old competitive eMTB rider who has reached the minimum age but has not yet applied for a learner's licence cannot lawfully ride their competition bicycle on a public road or shared path to reach a trail head for training. They are in the unusual position of being old enough to compete in sanctioned international sport but not lawfully able to train for it without a motor vehicle licence.

This is an unintended consequence of a provision directed at illegal devices and intoxicated PMD riders. The Foundation raises it because it illustrates the breadth of the licence provision's reach across populations that pose no demonstrated safety risk, and because the eMTB category is growing rapidly, including among juniors in Queensland.

11. Brisbane 2032 and the active transport legacy

This section is not intended as advocacy for the cycling sector. It is an observation about regulatory coherence and operational readiness for a state six years from hosting the Olympic and Paralympic Games.

The Queensland Government's Elevate 2042 legacy framework identifies active transport as one of the priority legacy domains for Brisbane 2032. The IOC's requirements for host cities now include explicit attention to sustainable transport planning, and cycling infrastructure features in this assessment. Every recent Olympic host city has promoted cycling and active transport as a Games mobility solution. It is a standard part of how cities manage the movement of athletes, officials, media and spectators during the event period, and how they position themselves to international audiences before it.

The operational implications of this Bill for the preparation period are concrete. From approximately 2029, Queensland venues will host substantial pre-Games activity; test events, national training camps, international team preparation. E-bikes are standard equipment in elite sport environments at this level. Running and triathlon coaches routinely ride alongside athletes to provide instruction and pace during long training sessions. Team support staff use e-bikes to move between training locations, venues and accommodation. The international coaches and support staff arriving in Queensland for this preparation work will not uniformly hold driver's licences, and where they do, those licences may not be recognised under Queensland's licensing framework. The Explanatory Notes confirm that international licence holders may ride, but as the Foundation has noted in section 6.5, that protection is narrower than it appears.

The United Kingdom's experience after London 2012 is instructive. The Games were followed by a sustained national investment in cycling infrastructure and participation that is widely regarded as one of the most successful Olympic transport legacies of the modern era. That legacy was built on a regulatory

environment that treated cycling, including e-bikes, as a legitimate transport mode requiring no licence and no motor vehicle registration. The lesson from London is that Games cities which make active transport accessible generate durable cycling cultures, and Queensland has the same opportunity with Brisbane 2032. The proposed regulatory framework would make active transport less accessible.

If the licence provision proceeds, Queensland will enter the six years immediately before the Games as one of the most restrictive e-bike jurisdictions in the developed world, applying a framework that no other comparable jurisdiction has adopted. This is a difficult position to explain to international sporting federations, visiting teams, tourism bodies and the IOC at a moment when Queensland is seeking to be seen as a progressive, globally connected host. The broader reputational question remains: Queensland is legislating for a regulatory environment that the most sophisticated e-bike market in the world, the Netherlands, has never considered necessary, and that the most recent Australian state-level reform process in NSW explicitly chose not to adopt.

Brisbane's active transport legacy would be substantially stronger if Queensland were the first jurisdiction in Australia to build a genuine cycling competence framework into its e-mobility regulatory response, rather than the first to require a motor vehicle licence for a bicycle-class device.

12. A proposed alternative: the cycling competence framework

The Foundation's alternative to the licence requirement is not an argument for doing nothing. We are proposing a different instrument that addresses the actual skills gap the inquiry documented, is supported by the Committee's evidence, uses infrastructure already operating in Queensland, and does not carry the unintended consequences of the licence provision.

12.1 What the Committee's evidence says

During the Committee's interstate research activities in February 2026, the Committee visited a Sydney school that had implemented a cycling competence program for students who ride e-bikes. Before the program, the school received approximately 50 complaints per week about dangerous student riding behaviour. After implementation, that figure dropped to four or five. The Committee's report noted that the approach works and should be implemented.

The Foundation agrees. This is the evidence that should be directing the regulatory response for young e-bike riders, and it points to a fundamentally different instrument from a learner's licence.

12.2 What cycling competence education already looks like in practice

Structured cycling competence education is not a new concept, and the delivery infrastructure for it already exists in Queensland and nationally. Several programs provide models for what a mandatory requirement could look like in practice.

AusBike, developed by AusCycling with Australian Government funding, has reached more than 50,000 children nationally and operates in Queensland schools. It covers road rules from a cyclist's perspective, hazard identification, and practical riding skills. TMR already funds school-based road safety education through its StreetSmarts program, which reaches young Queenslanders through schools, shopping centres, and community settings. Bicycle Queensland's school programs and the national Ride2School initiative provide further existing delivery frameworks.

Internationally, the most instructive model is the UK's Bikeability program. Introduced in 2006 and funded by the UK Department for Transport, Bikeability has trained over four million children in cycling-specific road skills and is now delivered in schools across England, Scotland and Wales. It replaced an earlier program and was designed from the outset as a government-mandated competence framework rather than a voluntary initiative. It has been supported by successive Conservative and Labour governments, is credited with measurable improvements in young rider confidence and safety, and has become the standard infrastructure through which the UK delivers cycling education at scale.

These existing programs show that the expertise, the curriculum frameworks, and the school delivery networks already exist, and Queensland would not need to build a cycling competence program from scratch. What is absent is a government mandate that ties an existing or adapted model to the regulatory response to this inquiry and gives it the status of a meaningful requirement for young e-bike riders.

12.3 What the Foundation proposes

Rather than requiring a Class C Learner Licence to ride a compliant e-bike, Queensland should introduce a mandatory cycling competence requirement for riders in the 16 to 17 age cohort, delivered through a visiting school program based on an established cycling education model. The program would cover cycling-specific hazard identification, safe path and road navigation, and practical control skills. Completion would be evidenced by a rider identification card that can be presented on request.

This approach does not require curriculum reform or Department of Education coordination. It does not require legislative changes beyond removing the licence provision and substituting a competence framework requirement. It directly addresses the skills gap the Committee identified rather than substituting a proxy that tests different skills. And it has evidence behind it from the Committee's own site visit.

Designed well, the program addresses pedal cyclists and e-scooter riders as well as e-bike riders, building a lifelong competence base for anyone navigating roads and shared paths. Cycling is the leading cause of sport and recreation hospitalisations for children under 16 in Australia. A cycling competence framework addresses that harm too.

13. National harmonisation and Queensland's regulatory position

At the Infrastructure and Transport Ministers' Meeting on 11 August 2025, Ministers agreed to work together to develop an integrated regulatory framework for personal mobility devices, to be led by Western Australia with support from the National Transport Commission. A draft framework was to be considered by Ministers later in 2025.

Queensland proceeding with a licence requirement that no other jurisdiction has adopted, and that NSW explicitly declined to introduce in its February 2026 reforms, works against that harmonisation process. Riders in border areas, particularly the Gold Coast/Tweed Heads corridor, which was raised repeatedly in the inquiry evidence, will face rules that differ dramatically from those applicable on the New South Wales side of the state border.

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