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

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9th April 2026

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

Dear Mr McDonald,

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

Submission by EveryBody eBikes, specialist provider of inclusive cycling options in Australia.

Thank you for enabling individuals and organisations to make further submissions in relation to the Parliamentary Inquiry into e-Mobility, following the release of the 28 recommendations by the committee secretariat.

Richard Herklots and myself are co-owners of a small, Queensland business dedicated to enabling people of all ages and all abilities to be able to ride for recreation, transport, community access and social participation. We are not your average bike shop as we specialise in electric pedal assistance on 2-wheeled bikes, 3-wheeled trikes and adaptive trikes. We are renowned throughout Australia for our adaptations and modifications to enable people to ride even when riding a standard mechanical or 2-wheeled bike is no longer possible. We are known as the Home of Inclusive Cycling.

As regular riders ourselves, we appreciate the serious safety issues created by dangerous, illegal electric motorbikes and the urgent need to remove the e-motorbikes and high-powered e-scooters from our footpaths, bikeways and transport network and we have daily first-hand experience of encounters with such riders when commuting on our compliant ebikes to our workplace along Kedron Brook bikeway. **We do not dispute the need to remove these illegal, non-compliant devices from our shared spaces and to bring the active transport network and recreational areas back to being safely shared by pedestrians and bike riders**.

When focussing on our broad community, **we supply solutions to people of all ages**. Many people come to us as a point of last resort, not being able to ride a standard 2-wheeled bike and without the physicality to ride without electric pedal assistance. This may be related to their age or a disability or a medical event or condition that has caused them to lose strength or energy. They are individuals who seek to be or remain active, who know the importance of movement to retain and rehabilitate their bodies or they are people who have not previously been able to participate due to a lifelong condition or impairment, either physical or intellectual. **We are concerned that there are proposed recommendations being tabled that will have unintended negative consequences on our current community members and people seeking support in the future.**

This draft law cracks down on safe, legal e-bike use despite all of the evidence presented to the inquiry clearly demonstrating that compliant devices are not the problem and people riding electric tricycles or adaptive tricycles are not contributing to the e-mobility accident statistics in any way.

If this Bill is passed in its current form –

- Safe, legal e-bike riders will be forced off bikeways built for cycling and onto more dangerous on-road environments;
- Older and young riders who rely on e-mobility with electric pedal assistance to access their community will be excluded from being able to ride.
- Riders of devices with more than 2-wheels will be encumbered with the need to seek Special Circumstances Permits, if adopted, to enable the use of legal e-trikes in the community.
- People with disability will not have a instrument to enable appropriate adaptations to be fitted to their pedal-assisted devices to compensate for their lack of mobility.

EveryBody eBikes seeks urgent changes to the Bill including

1. **Dropping all licensing, speed limits and age bans for legal e-bikes and e-trikes** – they are an unreasonable requirement that unfairly targets people with disability, people with age-related impairments and people who choose to adopt sustainable transport initiatives over car use, all of whom can safely and respectfully ride in the community;
2. **A clear and workable e-bike and e-trike definition** – that covers the 210,000+ safe, legal e-bikes and e-trikes Queenslanders already own with a focus on the key compliance criteria of (a) Maximum speed with assistance capped at 25 km/h, (b) Maximum continuous-rated power of 250W with appropriate peak power for Queensland's terrain, and (c) Walk assist mode capped at 6 km/h;
3. **Enabling a legal mechanism to enable exemptions for compliance requirements for people with disabilities and people with medical conditions** – with the support of Medical and Allied Health professional evidence to mitigate risks associated with e-bike or e-trike use by people with compromised mobility.

The people who seek out our services come from all walks of life in all age groups on a regular basis, requiring specialist support through the provision of e-bike and e-trike options that help riders who lack confidence, balance or physicality to engage regularly and sustainably in active mobility. As we specialise in safe, stable and speed-modified options, with legal and compliant solutions that reduce maximum pedal-assisted speeds, we are able to support individuals, families and the Allied Health industry with meaningful solutions that will keep their clients active and mobile. **The recommendations threaten to isolate those people who need pedal assistance as the only option to be actively mobile. Those individuals have openly shared their personal stories, and these are presented in the following submission details as examples of why there will be negative unintended consequences of the blanket laws, if applied.**

We look forward to providing in-person evidence to the committee.

Yours sincerely,

Andrea Herklots
Director, EveryBody eBikes

Richard Herklots
Director, EveryBody eBikes

Supplementary information in support of the urgent changes to the Bill requested by EveryBody eBikes:

1. Dropping all licensing, speed limits and age bans for legal e-bikes and e-trikes

Licensing
The Bill seeks to require all e-mobility riders to hold a valid driver licence of any type or class, effectively setting a learner licence as the minimum and to be deemed medically fit to drive.

No tabled evidence demonstrated that riders of legal e-bikes or e-trikes required additional training to reduce accidents or collisions with other shared path users. The evidence presented during the Inquiry was limited to incidents involving e-motorbikes, high-powered and standard e-scooters and motor vehicles impacting riders.

To apply a blanket requirement for all users of e-mobility to obtain and maintain a licence for a motor vehicle has the potential to severely impact safe e-mobility users who are unable to obtain such a licence due to intellectual impairment, disability or through their own choice not to take on this onerous requirement for 3-yearly renewals. This also has the potential to impact active transport tourism and inclusive tourism in Queensland.

Individual Submission – Andrew Chesterman, QLD 4051 – e-trike rider (son):
"*Our son is 22 and has an intellectual disability, no speech and cannot ride a traditional bicycle. His e-trike has opened up the world of cycling with his family like any other young man. It provides stability, assisted only peddling and is speed limited. The proposed laws means he would need a license (which he could not obtain) meaning they will simply deny him any ability to ride. E-trikes are also not covered by traditional e-bike standards thus any blanket rule must take into account people like him and the thousands of alternative e-mobility devices being used legally and sensibly today. By all means, police the illegal scooters and e-motorbikes. Confiscate them. Squash them. Radar test them. Breath test anyone. But have some sense about the proposed 10km/h speeds on shared paths and please don't deny those with medical or other disability challenges the right to ride*."

Individual Submission – Fay J, QLD 4551 - e-trike rider:
Fay and her daughter ride regularly for social reasons, particularly to enable Fay to be able to participate in bird-watching after a period of over 10 years with health struggles. Although this is not a direct quote, as Fay is scared to speak out in case there is some form of retribution, she has called several times since purchasing her e-trike to advise how much it has changed her life and brought joy back into her life. Fay voluntarily gave up her drivers licence and has no intention of getting back behind a wheel of a car. She rides with her daughter, is supervised while riding and has excellent cognition in regards to the handling of the e-trike and use on both footpaths, bikeways and off-road for her bird-watching endeavours. Requiring Fay to get a licence would stop her being able to actively participate in this outdoor, recreational activity, as she would not be considered medically fit to drive. She is definitely medically fit to ride an e-trike at low speeds and under supervision.

Individual Submission – Nicholas Wixted, QLD 4151 - e-trike rider and commuter:
"*I do not hold a drivers or learners licence due to my disability. I have previously held a L licence but decided that driving wasn't for me for personal reasons. This legislation will require me, in effect to obtain & renew my learners licence. Therefore I will have to comply with the medical fitness criteria which is totally unsuited to an assessment of suitability for a e-trike and an unnecessary administrative burden for me to simply access the local community which I have been doing safely for over 15 years."*

"High speed, fully electric PMD's are fundamentally a different mode of transport to 'pedalec' e-trikes/e-bikes and the current blanket approach to all small e-mobility is clumsy, inappropriate and counter-productive."

Individual Submission – Di Richards, QLD 4507 - e-trike rider:
"*We live on Bribie Island. We both have a driver's license currently but prefer to get a round on our e-trikes. Eventually we may lose our licence , but would hope to continue with our e-trikes to go to the Doctors and shops. I am unable to walk very far so the use of my e-trike is important for my independence as I age. It is good exercise and cost nothing. I am 76 and my husband is 77 and we have been riding our e-trikes around Bribie for 4 years and do a 12km ride most Saturdays as well as small rides during the week. People with disabilities must be able to ride e-trikes and other special designed options to enable their independence and movement*."

Individual Submission – Adam Lana, VIC 3000 - e-bike rider:
"*I live in Melbourne but often come up to the QLD to holiday and work. I regularly use legal e-bikes to get around for both recreation and for regular transport and have used some of the great infrastructure that has been created to get around, and am very worried about the 10kph limit imposed to travel on this shared infrastructure. I also do NOT agree that you need a license to ride a legal e-bike. An e-bike is simply a bicycle that assists with riders like me to get up hills and make rides easier. Banning, or further regulating dangerous e-motorbikes is where you need focus. I see this as a potential tourism problem for QLD*."

Individual submission – Ben Fallon, QLD 4051 - e-cargo bike rider:
"*I am medically unfit to hold a driver's licence and for 10 years my children and I have been using legal e-cargo bikes for daily transport, groceries, school, appointments etc." As my children are now older, they too ride independently using compliant e-bikes and we ride together. "Under the new laws, I won't be able to ride any of my legal e-bikes, and my children won't be able to ride theirs*." This is not an acceptable change and will impact our lives considerably.

Individual submission – Noel Sopeer, QLD 4305 - e-recumbent rider:
"I am a 69 year old male and I ride a recumbent E-Trike on the roads and on rail trails. I have bulging discs in my lower back and I can no longer ride an upright bike due to the pain. I have a motorcycle license but I could have to give that up when I reach 75 depending on doctors advice, I do not drive a car. Getting special permits for my 3 trikes will not be easy if I have to travel to a testing center and pay for the testing as I am on an aged pension. My partner also rides 2 recumbent E-Trikes with me on the roads and rail trails as she has osteo perosis and any fall from an upright bike will cause her to sustain broken bones, she will also be inconvenienced the same as I will by the new rules if they are implemented. A higher wattage motor for trikes would be good as trikes are heavier than bicycles and the extra torque will help. The same 25kph cut off and 6 kph throttle cut off will still be fine. A throttle is very helpful for taking off from a standstill at lights."

RECOMMENDATION: EveryBody eBikes requests the State Government to scrap the requirement for legal e-bike and e-trike riders to need a licence and continue to treat legal e-bikes and e-trikes as bicycles, as adopted by nearly every other society and should be available for legal use by residents of Queensland, visitors from Inter-State and overseas visitors coming to Queensland for tourism reasons.

Speed limits
The Bill seeks to introduce a maximum speed limit of 10km/h for e-bike and e-scooter riders on footpaths in Queensland where that infrastructure is shared with other users including pedestrians.

E-bikes are heavier than mechanical bicycles because of their frame design, motor and battery. That extra weight matters when attempting to maintain safe riding speeds and can cause a rider to become wobbly at speeds under 12 km/h, as noted by the existing TMR's Guideline: Speed management on share paths (August 2020), where it is stated that "*Studies of bicycle operational stability during the last century have shown that a bicycle can become unstable at speeds below 11 km/h. The degree of stability depends on a number of factors: the skill of the rider; the design of the bicycle; and environmental factors such as path surface and slope*."

Furthermore, this Guideline identifies that, "*Requiring people riding bikes to travel at speeds which may detrimentally affect their stability (and safety) on inadequately-designed paths, shared with other users insensitive to their operational needs, is not an equitable or safe path management strategy*."

TMR's own research clearly showed that "*There is no defensible justification for imposing regulatory speed limits on shared paths. A more constructive approach would be to provide clear instructions to people riding bikes of appropriate speed and behaviour in relation to other path users through effective path design and traffic control devices*."

Given that these statements were made in 2020 at the height of the e-bike and e-trike peak selling period during Covid, e-bikes in one form or another had already been around in Queensland for nearly 10 years. Their use was not a "new" or "novel" phenomenon in 2020.

Our business is located very close to a designated bikeway: Kedron Brook Bikeway, which by the TMR definition is a shared path and would be subject to the new 10km/h limit to be imposed under this legislation. Having ridden nearly daily, our staff ride in close proximity to many other users, relying on the overarching principle of courtesy and respect, slowing down when passing other users but maintain a safe and consistent speed to maintain the flow of all other users.

Individual Submission – Helen Davis, QLD 4510 - e-bike rider:

"*I am writing this not just as a member of the community, but as someone whose life has been genuinely changed by access to an e-bike. I live with cerebral palsy. Every day, there are reminders that my body doesn't always allow me to move through the world in the same way others can. There are limits, barriers, and moments where I have to sit on the sidelines, however my e-bike has given me something rare and powerful, the ability to feel 'normal'. When I am riding my e-bike, I am not defined by my disability; I am a parent riding with my family, I am part of my community and have a sense of independence. My bike has allowed me to do things that many people take for granted and that I had lost for a period of time. I can now ride alongside my children (not staying at home by myself), getting out into the community without relying on others, and being active in a way that supports both my physical and mental health. It gives me freedom, dignity, and connection. That is not something easily replaced. The proposed reduction in speed may seem minor on paper, but for riders like me, it is not. Dropping speeds by 10 km/h will not make riding safer, it risks doing the opposite. Maintaining a certain level of momentum is essential for balance and stability, particularly for people with physical challenges. Slower speeds could make riding feel unstable, unsafe, and ultimately not viable. What is being proposed risks taking away something that has given me and others a sense of independence and belonging. E-bikes are not just recreational devices for everyone. For some of us, they are a lifeline. I ask that you please consider the real human impact of these changes. Consider people like me, who rely on e-bikes not just for convenience, but for inclusion, health, and quality of life. Please do not take this away from us*."

Individual Submission – Nicholas Wixted, QLD 4151 - e-trike rider and commuter:
"*The legislation targets capacity for speed, rather than rider behaviour. This is a crude measure which does not address the root cause. For example, 10km/h may well be too fast on a crowded shared footpath but is impractical for a rider on a wide path with plenty of space. A blanket 10km/h speed limit negates a lot of the safe & practical use of my e-trike for running my daily life in lieu of driving a car. E-trikes & e-bikes have a much shorter stopping distance & can decelerate from say 20km/h to walking pace within metres of a hazard, if needs be.*"

Individual Submission – Kym Connolly, QLD 4575 - e-trike rider:
"*My etrike cannot move without me pedalling and is limited to 25km/h, not that I have ever pedalled fast enough to reach that top speed. I ride on shared paths, preferring to ride on wide paths allowing room for me, other cyclists and pedestrians. My usual speed on empty paths is around 16km/h which gives me momentum and exercise. When I pass pedestrians, I slow to around 12km/h and ring my bell. Applying a 10km/h speed limit to all footpaths, regardless of foot traffic, including shared bikeways will severely impact the use and enjoyment of my etrike. Shared paths are specifically designed for use by both pedestrians and cyclists and gives us a space for safe commuting and recreation. I ride my etrike for exercise and commuting and limiting my speed to 10km/h is simply unsustainable for active exercise and commuting. Why should an ebike be restricted to 10km/h when a normal bike can be ridden on the same path at higher speeds?*"

Individual Submission – Stephen Amos, QLD 4053 - e-bike commuter:
"*I commute to work on an e-bike and have measured the roundtrip distance from NW Brisbane to the city using a mix of shared footpaths and bikeways. Making segments of the commute restricted to 10 km/h will essentially increase my commute time by 20 minutes each way (40 minutes additional travel time for a daily commute), reducing the viability of an active transport commute or forcing me onto the busy road network.*"

Individual Submission – Julie De Rosa, QLD 4169 - e-bike rider:
"*With an e-bike, cycling stopped feeling like something reserved for people who were fitter, stronger, or smaller than me. It felt accessible. Immediate. Possible. Right then and there, I could see myself doing it. At first, it was gentle. Short, slow rides in the sun. A bit of exploring. I started riding the 3.5 kilometres to work and back on my in-office days. It felt manageable. Sustainable. Mine. Over time, those rides grew longer. My strength improved. My fitness improved. But more than that, something deeper changed. My confidence came back. I started to trust my body again. I could push it a little further and it would respond. It wouldn't let me down. That feeling is hard to describe, but it's everything. Six months later, I'm registered for the Tour de Brisbane 50km ride. If you had asked me six months ago whether I could do something like that, I would have said no without hesitation. Now, it feels not just possible, but exciting. My e-bike didn't just help me move more. It helped me believe more. Brisbane's dedicated cycle paths have been a big part of that journey. They give me space to ride with confidence and consistency. Shared paths, on the other hand, can feel unpredictable and unsafe. Pedestrian movement is hard to anticipate, and it changes the experience completely. Road riding feels even less safe. If access to safe, dedicated cycling infrastructure were reduced or limited, it wouldn't just be inconvenient. It would directly impact the healthy habits I've built, and the progress I've made.*"

Individual submission – Julie Gash, QLD 4216 - e-bike rider:
"*My husband and I (who are 61 and 65) are avid mountain e bikers. We love mountain biking. We love our e bikes. Especially love going out in nature and enjoying trails and rail trails and everything else we can do with our electric mountain bikes. We feel this laws is very unfair to the regular law abiding people that get out in nature and enjoy a healthy lifestyle.*"

Individual Submission – Helen Hodgkins, QLD 4214 - e-bike rider:
"*I am 67 years, ride an ebike for fitness, social connection and enjoyment. I enjoy bike tracks and footpaths as I am fearful of riding on busy roads. I cannot ride at 10km per hour but happy to slow down around pedestrians.*"

Individual Submission – Kerrie Dymnycz, QLD 4077 - e-bike rider:
"*I am a 62-year-old grandmother who struggled to keep up with my family on long rides and walked my bike up hills. My family used the waiting for grandma times to have a drink break. My family bought me a EN 15194 LEGAL e-bike for Mother's Day and it's been the best gift ever! I now tow the cargo trailer (picnic supplies) and I have a forward-facing shotgun seat for my youngest granddaughter to ride with me. Please don't break up our family rides by making me ride on the road in traffic. I want to be able to ride with my family without prejudice and feel safe.*"

Individual submission – Chris Reynolds, QLD 4350, e-bike rider
"I live in Toowoomba and ride my compliant e-bike 7km each way to work. I mostly ride to work on the road, but there are a few sections where it would be legal to ride on the road, but I would hold up traffic if I did so. Outside of the CBD, Toowoomba has VERY low volumes of pedestrian traffic. It is rare that I will encounter a pedestrian but when I do I'll slow to an appropriate speed, ring my bell and pass when I have established it's safe, as required by current laws. The roads I ride alongside are busy with cars, utes and heavy trucks; often with no way to safely (and legally) overtake a bike travelling at 25km/h max. In most instances, the 10kmh limit will be an inconvenience. However there have been times where I have felt unsafe due to people or dogs I've encountered on my ride. Knowing that the bike can get me to 25km/h when I feel a potential threat is a significant reassurance. Riding gives me a mental break between work and home. It's become a part of my healthy routine and on the days I ride I'll tend to arrive at work more energised and productive than days I drive. When I drive, I take up a parking spot at the hospital I work at, I add to traffic congestion, contribute to air pollution and add to my fuel bill."

RECOMMENDATION: We urge the State Government to reconsider this blanket change to most of the active transport network, given there is little evidence that legal e-bike or e-trike riders are contributing in any way to accidents with pedestrians on these shared spaces. We urge the Government to retain the current 25 km/h limit on shared pathways over 1.5m wide and on designated bikeways including routes like Kedron Brook Bikeway and North Brisbane Bikeway and all infrastructure designed for co-use with pedestrians.

Age bans
The Bill seeks to Introduce a minimum rider age limit of 16 years for e-mobility devices. EveryBody eBikes has worked closely with families across Queensland who require electric pedal assistance to enable their child with disability to actively participate with the peers. In most instances, the funding for these children has come from Federal or State funding bodies, including the NDIS and from charities such as Variety Queensland and the Starlight Foundation.

Applying this minimum age limit in a blanket manner without the opportunity to seek an age-related exemption due to disability would force families to stop riding together, for individuals to be left out of social participation opportunities and for responsible, legal e-bike riders to no longer be able to use an active transport means to travel to/from school, from sporting events and other social activities.

Some areas of Queensland have low car-ownership rates due to socio-economic factors and choice. Many of these regions also have high disability population and high numbers of vulnerable people. Taking away a low-cost alternative to car ownership will force those populations to extend their journey times using public transport, if available or for those populations to reduce or stop participating in healthy, outdoor activities.

Use of legal, pedal assisted adaptive trike and stabilised e-bike for a Child with Cerebral Palsy
This life-long condition often affects balance and mobility and can affect one side more than the other resulting in uneven gait and challenges with transferring on and off a standard bike and being able to pedal while balancing on 2-wheels. EveryBody eBikes is one of several suppliers of electric tricycles and adaptive trikes to enable children with CP to be able to fully participate in age-appropriate outdoor activities. Our most common product funded through the NDIS is a lightweight 20" electric bike to which quick release adult stabilisers are fitted to provide balance support. In most instances, the power system on this device is significantly reduced to only 5-50% of the 250W compliant motor, depending on the age of the rider, their cognition and the terrain of their local neighbourhood. Even with a hint of power at 5%, it can make the difference between that child being fully independent when riding on grass or on slight inclines, compared to dependent on a supervising attendant to push them to get started every time they stop. A common dependence on the walk assist feature to overcome the inertia of being stationary is often at times a fundamental use of the pedal assistance facility and the use of a low level of power with the maximum speed similarly set to a lower maximum than legal (25 km/h) is a frequent configuration for our CP riders.

Individual Submission – C&D Meyer for their son James Meyer (12), QLD 4037 – e-trike rider (son):
"*James is as 12-year-old boy with quadriplegic cerebral palsy. He has been riding modified adaptive electric trikes since he was 5!. James does not have the physical power or balance to pedal a regular bike but with the addition of pedal assist, he can ride and keep up with his friends. Removing the ability for him to use his bike at all will isolate him and limit his mobility. There must be a better way. Is blanket banning all legal pedal assist bikes for under 16s really the best answer?"*

Use of legal pedal assisted bicycle and stabilised bicycle for a Child with Dwarfism
Children with dwarfism and other forms of short stature are unable to ride a standard bike. Adapted bikes designed to accommodate short limb length (arms and legs) by design must have super-low step-through heights and shortened cranks. Without electric pedal assistance, the rider does not have enough mechanical leverage to get a bike into motion from stationary, due to the design geometries required to accommodate their unique build.

EveryBody eBikes has worked closely with this cohort to design a bike that will enable short-statured riders of all ages to participate in riding activities with their peers and families. Reverting to a mechanical bike only for those under 16 will negatively impact these riders as they will not be able to keep up, ride on grass, ride up hills. A standard mechanical bike has a crank length of 170-175mm. These riders need to use a crank of between 70-92mm only. This is not enough to get the bike started without electric pedal assistance.

For the first time in the world, a Queensland small business has developed an e-bike for children with short stature so they can ride to school, join friends in the park, ride on rail trails and keep up, even lead the way. We believe the Queensland Government should be celebrating the innovation and commercial foresight of EveryBody eBikes in developing this world-first equipment for a small minority without any alternative viable bike options on the market. We have just opened up their world and will now be forcing them to stop and wait until they are over 16 to learn to ride and to be able to participate.

Individual Submission – Krysten Thomson for daughter Maggie A, QLD 4700 – adaptive e-bike rider:
Maggie is one of the first children with Achondroplasia to embrace the Lightning e-bike, designed for people with short-stature. She uses the e-bike to mobilise around school, with friends, around her neighbourhood. She is unable to walk long distances due to her condition and can use the e-bike to

participate with friends and family and keep up. Maggie's story was published by the Guardian in response to the e-mobility legislation.

Use of a pedal assisted adaptive trike or stabilised e-bike for a child with Duchenne Muscular Dystrophy
This terminal condition affects male children and is genetically passed by parents. Many children living with DMD have a life expectancy of between 20 and 30 years of age. Between the ages of approx. 4 and 10, these boys have a small window where they can actively participate with their peers and join in with age-appropriate activities such as riding in the park, riding with friends, riding to school. They can only achieve this using an electric pedal assisted adaptive bike. The device is often stabilised and is designed to minimise muscle use as exertion and fatigue can exacerbate their fatal condition. The prescribing therapists require the accessibility device to include pedals but to be operated with the lowest resistance by the rider. At around 10 years of age, these children will migrate to full-time use of a powered wheelchair. To achieve maximum use of the adaptive bike during the period where the rider is physically able to pedal and able to participate in age-appropriate activities such as riding with friends in the park, the power levels are adapted down to match those achieved by able-bodied riders of mechanical bikes and the maximum speed is usually reduced to 12 or 15 km/h. Children with DMD are usually supervised when using their adaptive etrike.

We have boys with DMD who use their adaptive trike with electric pedal assist to participate in school cross-country events, to ride with friends and family. We have another family in Laidley who uses the adaptive trike with power to enable their son to ride on the footpath to school. These families have short periods when their child is under 16 due to the nature of their condition and the progression to use of a powered wheelchair as they age.

Use of electric pedal assisted adaptive tricycles for children with Complex physical and intellectual disabilities
Many families have been funded through NDIS or charitable organisations for adaptive trikes with electric pedal assist. Many of the riders are unable to control the trike independently and the design has a rear steering arm which also enables an adult attendant to steer, brake and control power. These models are fitted with electric pedal assist to reduce the friction felt by the rider when completing the pedalling action, to encourage skills development but also to assist families and support workers to be able to push the adaptive trike and rider on hills and across grass. These unique adaptations are supplied to children with disability throughout Australia and we have already been receiving calls from anxious parents who are concerned that their disabled children will no longer be able to use the assistive technology prescribed by their therapists and funded by NDIS. Given these families have already been through an extensive review process to obtain the equipment, we feel strongly that they then should not be required to defend their right to have their children continue to use the equipment, even though they are under 16 and using a pedal assist adaptive trike with power.

The people we see on a weekly basis are generally law-abiding citizens who are struggling with the challenges of caring for children under 16 with a range of disabilities and having a means to enable them to actively participate with family and friends in their local community. A fundamental goal for these families is to provide safe, prescribed equipment that enables their child to actively participate, to develop the skills and confidence to ride with assistance, under supervision or independently. Restricting access to pedal assisted adaptive bike and trike options will force these children to watch from the side-lines, to delay their skills development until their later teens and to be unduly discriminated against, given they do not have the physicality to ride a mechanical bike like able-bodied children.

We are receiving calls daily from parents of children with a disability worried that they will be unable to continue to use prescribed Assistive Technology funded through the NDIS where the unit is a tricycle or adaptive tricycle with power.

We need a clear way to exempt families with children under 16 living with disability to be able to utilise their funding approval framework to exempt them from having to generate additional evidence when the funding for the Assistive Technology has been approved by NDIS or NSIIQ. They should not be required to jump through additional hoops to be able to continue to legally use this electric pedal assisted equipment for riders under 16 and not be concerned that the parent or attendant will be liable for fines issued.

We also recognise that able-bodied children under 16 should also have the right to use legal and compliant e-bikes to participate in activities with friends and family. The recommended age limit impacts those who rely on this technology to safely get to school, to participate in longer and more frequent social rides and to participate in activities that require improved endurance and strength. These are individuals who will potentially continue to use sustainable transport in their adulthood and already realise the benefits of safe, speed-limited and legal e-bikes in their everyday lives.

We have already been contacted by families who have this specialist adaptive equipment concerned that they will be unable to use this essential equipment if the rider is under 16, although that ride is not riding independently.

Use of legal pedal assisted e-bike or e-scooter to get to school
The following are just some of the messages sent to EveryBody eBikes by families and individuals who rely on legal e-bikes for active transport. They have submitted their lived experience as a way to demonstrate why a blanket ban on e-bike use by under 16s would be an overwhelming negative for those families who use compliant e-bikes.

Individual Submission - Adrian G, QLD 4000 - e-bike family:
"*My 10-year-old son rides his (legal) pedal assist bike to school, we got it … 4 years ago – he goes around 35km down some big hills. What will happen to him? Buy him another mountain bike?"*

Individual Submission – Desha Delumani, QLD 4228 - e-bike family:
"*We live in Tallebudgera. There is no reliable school bus. There are no pedestrian safe paths. There is no other means of public transport. I am a single parent working full time. E-bikes and an e-scooter saved my life. My kids ride to school and back without a need for after school care. They can go to their afternoon sports which otherwise (if I needed to pick them up and drive) it would not be possible. It brought so much quality to our lives. Unfortunately they are not 16 y old and don't hold L license.*

Our roads are not safe but not due to kids riding bikes, due to lack of bike tracks (especially in Tallebudgera) and car drivers that speed and swear. Petrol prices are so expensive… using e-bikes and e-scooters more by making safer roads is way to go. Banning and not improving infrastructure so we stay limited to only using cars is wrong way to go."

Individual Submission – Lee Blacklock, QLD 4553 - e-bike rider:
"My 12-year- old granddaughter and I both have legal e-bikes. We bought her one for her 12th birthday. We enjoy cycling together whenever we can but stick to the footpath for safety. She was intending to ride the bike to school. An e-bike is essential for us as school is 8kms away and we live in a very hilly location. These proposed rules will have a significant negative impact on our lives."

Queensland is finally embracing safe and sustainable active transport lifestyles with grassroots progress made with the support of several initiatives and grants aimed at promoting bike riding among school-aged children, which includes the use of e-bikes and e-trikes in communities or for individuals unable to ride a mechanical bike.

Further support for initiatives including the "Bicycle Riding Encouragement Program Community Grants". "Queensland Active Transport Grants Program" and the "Wheely Wise Program" to include the use and handling of pedal assisted bikes and trikes would offer additional training to younger riders without limiting them to only mechanical solutions which may not suit their abilities, their local neighbourhood, their use case or distance needed to ride.

RECOMMENDATION: We urge the State Government to recognise that the safe use of compliant e-bikes and adaptive bikes and trikes for children under 16 including those with disabilities should continue.

Let's be forward-thinking and encourage our younger riders to adopt safe riding practices without prescribing the type of legal, compliant bike they can ride.

2. A clear and workable e-bike and e-trike definition

EN15194 in its generic definition works well for 2-wheeled electric bicycles, encompassing the boundaries of performance for the electric system as well as best practice for the design of the frame and associated componentry. Due to the geometric metrics required to meet compliance, electric tricycles are unable to achieve compliance.

It is recommended that a subset of the EN15194 key electric criteria be adopted for electric tricycles, with compliance being achieved if the trike:

- Has a tamper-proof maximum continuous rated power of 250W;
- Has a tamper-proof maximum pedal assisted speed of 25 km/h;
- Has a tamper-proof maximum assistance walk-assist feature of 6 km/h.

Furthermore, we offer some insight into how adaptive e-bikes and e-trikes require modification to enable them to be used by a broad spread of riders of all ages and all abilities. To meet the needs of these less-able riders, we offer some suggestions to mitigate 2 major concerns we have of a strict adherence to EN15194. These concerns and suggestions are further explored in the Technical Appendix at the end of this document.

We request that electric tricycles and adaptive tricycles that are unable to achieve full compliance against EN15194 should not be considered a 'prohibited bike' if the unit meets these criteria. We request an urgent exemption for 3-wheeled bicycles that does not require an excessively onerous documentation process to obtain a permit. As many of our customers are older, living with disabilities or caring for someone with complex needs, if they have already secured funding or are considered eligible for funding through one of the Federal or State agencies, we request that this "evidence" is considered sufficient to receive a permit without additional overhead.

3. Enabling a legal mechanism to enable exemptions for compliance requirements

We seek a framework to enable trike riders, with the documented support of a Medical Practitioner or Allied Health Prescriber, to secure exemptions for one or more of the EN15194 key electric criteria.

The justification for this would be based on age, physicality, geographic terrain conditions and/or health. Where the risk to the individual is greater without the exemption, a qualified professional should be able to recommend exemption that is legally recognised by the judiciary and insurance bodies.

Specifically for children under 16 with a disability, their NDIS or NSIIQ funding approval for Assistive Technology that is prescribed by an Allied Health Professional should not have to seek additional permits to recognise their use of the AT is legal both for the judiciary and for insurance cover.

Funding for solutions supplied by EveryBody eBikes is not limited to privately funded e-bikes and e-trikes. We supply to people funded through the National Disability Insurance Scheme (NDIS), older people with Home Care Packages, Veterans and people who have sustained injuries following a traffic accident through the National Injury Insurance Scheme, Queensland (NSIIQ). Over 99% of these solutions involve the use of adapted pedal assist to provide gentle power assistance to people with compromised mobility and if these laws are passed, most of the people requiring assistance will lose their ability to choose movement over sitting in a wheelchair or mobility scooter, thus potentially increasing the burden on the healthcare system.

Many of the riders of adaptive trikes do require additional assistance with getting the heavy device into motion and as part of that requirement, EveryBody eBikes has developed a speed-limited start-boost feature which works like the walk-assist 6km/h tool but offers enough power to get the bike moving with a person sitting on the bike rather than walking along side. Customers with physical impairments may not be able to walk or push their trike and rely on its propulsion from stationary using leg power and a start-boost alone until the trike is moving. As they are generally seeking active mobility solutions, they have no intention of riding without pedalling once the bike is moving. Furthermore, many adaptive trikes have hub-motors rather than mid-drive motors. The inherent peak power delivery with a hub motor is lower than achieved by an EN15194-compliant mid-drive motor such as a Bosch system (max 750W with 250W continuous rated power). These same riders may require the additional torque to get the trike up a steeper hill or over rough ground and with a hub-drive solution, this is only possible with a higher torque 500W motor just to achieve a similar level of support on hills. **These 2 constraints are further outlined in the Technical Appendix below and should be included as exemption options for less-able bodied riders**, supported by their medical practitioner, allied health therapist or funding body.

Individual Submission – Kyla Battershill-Pape, QLD 4110 - e-trike rider and mother:
"*Both my children and myself have varying disabilities. My children both have low muscle tone (amongst other challenges) which makes riding anything but a bike with assistive power, impossible. My children are both happy to ride speed limited bikes (for their own safety as well as others) but to lose the ability to ride at all because they are under 16 years of age (4 and 11 years old) would be to discriminate against them. Reasonable adjustments must be made to legislation to accommodate for people with disabilities. Exemptions to age limits for people with disabilities are required to prevent discriminatory legislation and future legal action. I have multiple conditions that affect my ability to ride on my own. Foot drop, dominant side weakness, tremors and chronic fatigue are just some of the challenges I face with riding- an activity I love. To ride a bike I require a tandem (side by side) bike with assisted power so that my support rider can pedal and move both of us, if I am unable to pedal myself. The bike I am in the process of purchasing is speed limited and modified/adapted with the purpose of making riding accessible to me, despite my physical challenges. To pass legislation that disproportionately affects people with disabilities is not in the*

best interest of the Queensland Government. It would be harmful to a community of people that are already disproportionately affected by other legislation. ***I ask the politicians involved to consider exemptions for people with disabilities of all ages****. Free registration of e-bikes for people of all ages with disabilities would mean that people with disabilities can continue to access their communities, workplaces, physical exercise and necessary places such as supermarkets and medical appointments in a way that is low cost (in a place where the cost of living is disproportionately affecting them) and safe*."

We note that disability voices are critical for the fair review of elements of this proposed law, as those individuals may be negatively impacted when relying on diverse pedal assisted e-bikes, e-trikes and adaptive trikes. The users and prospective users of this Assistive Technology include people of all ages living with various disabilities, medical conditions, or with neurodivergent conditions.

Under the Committee on the Rights of Persons with Disabilities, the Queensland Government is required to take measures that support and facilitate greatest independence as possible when it comes to personal mobility for people with disabilities under Article 20 of the UNCRPD. United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) | Australian Human Rights Commission.

Pedal-assisted bikes and tricycles are personal forms of mobility used to access and participate in everyday life activities – like work, school/education, recreation and social inclusion. Not only are they enabling, they are environmental-friendly, age-friendly, barrier-free, and healthy and contribute to lowering the dependency on the health-care system by improving overall physical and mental well-being.

There are many reasons why people with disability and medical conditions use pedal-assisted electric bikes and trikes, including:

- to mitigate mobility constrains arising from medical restrictions imposed on driving, this could be short to long term restriction and appears to be in conflict with the licencing restrictions being imposed for people deemed medically unfit to drive;
- to fill the gap in getting to and home from stations, stops (referred to as first and last mile of the travel journey) where fatigue, balance, distance, physical (gradient/slope geography) and natural environmental conditions (wind) etc can stop or make mobility and accessing transport difficult for people with disability;
- to bridge the gaps that prevent standard bike use to help people be or remain socially and physically engaged and active.

We recognise that many of our customers living with disability are seeking adaptations that improve their safe operation of the equipment. The key adaptations are listed in the Technical Appendix below.

Recommendation - We urge the Committee to discard the requirement to be medically fit to drive. We also strongly advocate for a simple mechanism to enable a person with a recognised disability or impairment to gain access to the appropriate safety adaptations to make riding an e-bike or e-trike safer on mixed terrain as described in the Technical Appendix below.

We also urge the Committee to work more closely with diverse people with disabilities, medical conditions, neurodivergent people and older people who use electric pedal assist devices to identify needs and better policy and programs to support their use. including if relevant co-design inclusive training education programs for users, pedestrians and drivers of vehicles.

All submissions have been made by individuals who request their stories be heard but who may be reluctant to make a personal submission for a range of reasons.

We request that these individual submissions included in our “community submission” be considered in their own merit but also considered in line with the range of people the EveryBody eBikes community has assisted over the last decade. We believe these stories represent many individuals throughout Queensland who will experience negative and unintended consequences of the legislation if passed in the format tabled in Parliament.

For their sakes, please consider making immediate changes to offer options for exemptions, the ability to continue to ride safe, legal and compliant e-bikes and e-trikes which do not exceed a speed limit of 25 km/h.

Thank you for your consideration and permission to share the voices of those who never use e-motorbikes or high-powered e-scooters but rely every day on usable solutions to be actively mobile in Queensland.

Technical Appendix: Submission to Parliamentary Enquiry into e-Mobility Safety and Use in Queensland
Submission date: 10th April 2026

EveryBody eBikes is a specialist e-bike and e-trike supplier. We design and import bikes and trikes and have gained extensive experience working with people with disability, people with limited mobility and older riders who are seeking safe and appropriate solutions to get back to riding regularly.

Note that we will use the term bike to refer to both a 2-wheeled bike and a 3-wheeled tricycle.

Over the last six years with have done many trials with NDIS participants and other customers and we know that the prescribing therapists for this Assistive Technology (AT) assess that there are safety risks to be mitigated if the rider is unable to independently transfer on/off the device or push the device if they have to stop on an incline in shared spaces. For these riders, there are several concerns that can be accommodated by an exemption to one or more of the electric design principles required to achieve compliance to EN15194 even if the recommendation is changed to EN15194 from the current EN15194-2017:A+.

Based on our extensive experience working with less able-bodied riders, the main items of concern are :

1. Walk assist without pedalling limited to 6 km/h.
2. 250W maximum continuously rated motor power.

Concern #1 : Getting the bike moving from standstill

For many of our riders, the most fatiguing and challenging part of their ride is getting the bike started from a standstill. To understand the limitations of standard legal e-bikes for people who are **not** able-bodied we need to discuss a couple of technical functions of electric motors.

Motor Power Control

There are 2 ways that the motor power is controlled on e-bikes when the rider is pedalling. The first is Pedal assist sensor (PAS) otherwise known as cadence control and the second is torque control. These two modes operate in different ways to control the power to the motor.

PAS/ Cadence:

With this mode when the rider starts to pedal, there is a slight delay of 1 to 2 seconds when the rider has to use their own muscle strength to move the bike until the bike senses that the peals are moving and the power turns on. Once the power is on then all the rider needs to do is keep the pedals rotating. Rotating the pedals activates a switch and whatever power level has been selected on the display is delivered to the motor. For higher power levels the rider can pedal very softly and slowly and the motor will pull them along. As the power level is increased the speed will increase even when pedalling at the same speed and with the same pressure on the pedals.

This type of control is common on hub motors used on lower end ebikes and most trikes. This type of motor control best suits riders with very low leg strength or uneven leg strength between each side, sometimes caused by CP, a stroke, Parkinsons or limb deficiencies. For these riders, the pedalling action does not require equal pedal pressure and can prevent the e-bike from surging between sides.

Torque-based control:

Torque mode is based on how hard the rider pushes on the pedals; the harder they push, the more power is applied to the motor. The torque sensor is very sensitive, so power is activated almost immediately when the rider starts to the push on the pedals. This is useful when getting the bike moving from standstill or when on a hill as the power assist comes on quickly to help the rider get the bike moving. Note that torque sensing does require the rider to have the muscle strength to be

able to push harder on the pedals to get more power assist. Torque-based motor control is normally used on cargo bikes and higher end e-bikes and provides a more natural ride experience. People with disabilities who need the ride experience to be intuitive, particularly those with brain injuries, will find this type of motor control suits them better.

Both of these modes present issues for people with limited mobility and or people with low muscle strength.

With the PAS mode the rider has to be able to get the bike moving from standstill and continue to push for the 1-2 seconds before the power kicks in which may not be possible for them to do especially on hills or with a heavy trike.

With the torque system, they need to push hard enough for the system to sense the pressure to get started, even though the power will come on quicky and they need to maintain relatively even pressure on the pedals while riding to overcome the surge effect.

This is why the throttle (start boost) is recommended for safety and should not be confused with the walk assist feature on most e-bikes.

Walk Assist
One option to overcome this is to use the walk assist function. Walk assist is legal on an e-bike and is designed to assist the rider when they are walking **beside** the bike. When walk assist is activated, normally by pressing and holding one or more buttons on the display, the motor starts without having to rotate the pedals and continues to run at up to 6km/h on a flat smooth surface as long as the button(s) is pressed. The power provided by walk assist is limited as it is only designed to assist a rider to walk the e-bike up an incline. This is not sufficient to get a heavy bike plus rider moving from standstill on anything but a flat smooth surface. The walk assist feature therefore is not adequate to assist a rider with compromised mobility overcome the inertia to get the e-bike into motion.

Our Solution: Limited speed start-boost throttle
Many of our customers require a "start boost" function which allows them to get the bike moving on a hill or to cross a road or get out of a gutter. The rider may not be confident or strong enough to get the bike moving when trying to cross a road or getting the bike moving on a hill. Riders with limited mobility may not be able to easily get on and off the e-trike so trying to get off a device that has stopped on a hill and pushing the e-trike is not safe or recommended.

E-bikes are significantly heavier than normal bicycles because of the motor and battery. That extra weight matters most at the exact moment riders are most vulnerable: taking off from a complete stop. Intersections, hills, and uneven surfaces where balance, stability, and acceleration are critical for safety.

As one of our customers has documented, "*A speed-limited start boost becomes a genuine safety feature. A small, controlled burst of power from a speed-limited throttle:*

- *Gets the bike moving smoothly, without wobbling or struggling to push a heavy frame from zero*
- *Helps riders maintain balance, especially on uphill starts or uneven intersections*
- *Reduces the time spent in dangerous conflict zones, like the middle of an intersection*
- *Gives tired or mobility-limited riders a safe way to get moving again*

"*Manufacturers didn't add throttles as a gimmick. They added them because they solve the single most dangerous moment in cycling: the first two seconds of movement. Pedal assist isn't magic, it's a sensor that gives you power when you rotate the pedals on a cadence-based e-bike. When you're tired or just going*

through the motions, you're not really "pedalling" in the traditional sense. You're simply triggering the motor. Functionally, it's the same idea as a throttle, just activated differently. So banning throttles while allowing pedal assist doesn't make logical sense. Both systems provide controlled, low-speed power. The only difference is that a throttle does it more safely from a standing start. People often confuse e-bike throttles with the twist throttles on illegal high-powered electric motorbikes. They're not the same thing.

On a legal 250W pedal-assist e-bike, a throttle:

- *is low-power*
- *is speed-limited*
- *is designed for stability, not speed*
- *cannot turn the bike into an e-motorbike*

If anything, every legal e-bike should have a throttle, because it gives riders a safe, predictable way to get moving — especially uphill or in traffic but the use of this should be for easy-start rather than continuous use instead of pedalling.

A throttle on a legal pedal-assist e-bike is a safety tool, not a speed tool. It helps riders get moving smoothly, maintain balance, and avoid dangerous situations at low speed. Banning throttles because illegal e-motorbikes exist is like banning seatbelts because some people drive too fast."

EveryBody eBikes has implemented a start boost function (limited speed throttle) that provides additional power to allow a prescribed e-trike to get moving when the rider is sitting on the e-trike and the balance of risk means the rider is less safe without this feature. This is agreed between the prescribing therapist and the rider and their family. The throttle speed is limited to 10kph, equivalent to the start boost feature available on a mobility scooter and is sufficient to get the e-trike moving with a rider sitting on the device and on a range of surfaces and inclines.

This feature is not designed to be used for more than several seconds to get the e-trike into motion. As soon as the rider starts to pedal, the e-trike reverts to a standard pedal assist device that can travel at up to 25km/h. This short-term start-boost feature provides the rider with additional power to get moving or cross a road. For e-trike riders who may not have the muscle strength the start boost means they do not have to get off the trike if on a hill and have the confidence that they can get across the road quickly.

For our "wobbly' riders on 2-wheel e-bikes, the transition from standstill to riding is also the most difficult phase of the ride, as it requires balance at very low speeds. The start boost function provides peace of mind as the rider can easily get to the e-bike into motion and up to 10km/h speed where it is easier to ride. It is also frequently used by older riders returning to riding a 2-wheeled bike whereby the start-boost can assist with testing their balance, using the feature to essentially ride at low speeds without pedalling while they are "re-learning" the art of bike riding. This is only a transitional tool to build confidence.

The software for this function is tamper-proof and only installed if there is a medical or disability-specific requirement. The controller is pre-loaded with custom software adapted by EveryBody eBike's manufacturing team and cannot be changed through the display or using after-market software.

Where a rider requires assistance to get the e-bike into motion, EveryBody eBikes recommends they should be eligible for an exemption to allow them to use a speed-limited start boost adaptation for safety.

Concern #2: Motor power limited to 250W continuous rated power

There are 2 important metrics when it comes to motor capacity in relation to e-bikes: **Power** is measured in Watts and **Torque** is measured in Newton metres (Nm). Torque provides acceleration and climbing strength whereas power provides top speed and endurance. Think of torque as "pulling power" that gets you moving, and power as "endurance" that keeps you moving at a high speed.

A typical 250W hub motor which is used on lower end e-bikes and most e-trikes can generate around 40Nm compared to a mid-drive motor, like a Bosch motor, that generates up to 85Nm for the same 250W nominally rated power.

For our customers who are not interested in high speed, the most important metric is torque as they need the pulling strength to get the bike moving from standstill on hills or the acceleration when trying to cross the road. Given that most e-trikes use hub motors, the rider is limited to around 40Nm, almost 50% less than a mid-drive motor with the same power rating. A 500W hub drive motor can produce approximately 65Nm of torque, still not as much as a mid-drive but considerably more than a 250W hub motor.

Our Solution: Permit a 500W hub-drive motor to achieve comparable torque.
To provide the required hill climbing and acceleration from standstill that our riders require we propose a max limit of 500W hub motor. These are still limited to 25km/h but provide the additional torque required for heavier trikes, heavier riders and those with reduced muscle strength. There are a number of situations where 250W is insufficient for our customers:

- With **heavier riders** considered to be “bariatric” with a BMI over 30, their weight in combination with the weight of the reinforced equipment required to safely enable participation, means that both maximum continuous rated power to sustain normal speeds under 25 km/h often requires more torque than generated by a 250W hub-drive motor.
- Riders with **reduced muscle** strength and/or fatigue quickly and are riding an electric trike which can weigh up to 40kg may require more assistance than a 250W motor can provide.
- **Passenger e-trikes** are very heavy to begin with, often over 50+kgs and then when you add an adult or a couple of kids on the rear seat 250W is not sufficient to assist the pilot to ride the e-bike or e-trike up hills or over anything but smooth, flat surfaces.

Where a rider requires assistance to get the e-bike up hills or across rougher ground, EveryBody eBikes recommends they should be eligible for an exemption to allow them to use a 500W hub-drive motor adaptation for safety.

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Andrea Herklots and Richard Herklots, Co-owners and Directors.
[redacted]