

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

Submission No: 1898

Submission By: RACQ



The Royal Automobile Club of Queensland Limited ABN 72 009 660 575

2649 Logan Road, Eight Mile Plains, Qld 4113

PO Box 4, Springwood, Qld 4127

13 1905 racq.com

 Assistance  Banking  Insurance  Lifestyle

9 April 2026

State Development, Infrastructure and Works Committee
Queensland Parliament
Queensland Parliament
George Street
BRISBANE QLD 4000

via email: SDIWC@parliament.qld.gov.au

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

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

On behalf of more than 1.7 million members, the Royal Automobile Club of Queensland (RACQ) welcomes the opportunity to provide further comment on the *Transport and Other Legislation (Managing E-mobility Use and Protecting Our Communities) Amendment Bill 2026* (the Bill).

RACQ commends the Committee on its extensive inquiry and acknowledges the Queensland Government's commitment to adopt all 28 recommendations of the Committee's report. We cannot lose sight of the ultimate aim - to save lives and avoid hospitalisations while continuing to enable responsible Queenslanders to ride sensibly and safely.

While RACQ broadly supports the Bill, after reviewing the detail and receiving member feedback, we strongly urge the Committee to recommend amendments to two elements that are likely to produce adverse outcomes if implemented as drafted. These outcomes would affect not only e-mobility riders, but also pedestrians, motorists and society through impacts on the broader transport network.

The two issues of concern are:

1. The minimum requirement for e-mobility riders to hold a learner driver licence (of any class), including for shared e-mobility schemes; and
2. The introduction of a uniform 10 km/h speed limit for all e-mobility devices on footpaths and shared paths.

RACQ members - many of whom are both motorists and e-mobility users - strongly support targeted enforcement against illegal devices, clearer definitions, and protections for compliant riders. However, some are concerned that overly broad restrictions risk reducing safe, affordable mobility options without proportionate safety benefits.

Issue 1: Driver licensing is a misaligned regulatory tool for e-mobility

RACQ's position during the inquiry ([our original submission can be viewed on our website](#)) was that no licensing requirement is necessary for legal e-mobility riders in Queensland. A driver licence is designed to regulate the operation of motor vehicles in complex traffic environments, not low-speed personal mobility devices operating primarily in pedestrian or pedestrian-adjacent spaces.

However, if the Government is committed to introducing a mechanism to establish a minimum age and ensure knowledge of road rules, RACQ recommends an alternative approach that is more proportionate and inclusive.

Rather than requiring a driver licence, RACQ recommends allowing eligible persons aged 16 years and over to complete a **stand-alone e-mobility road rules and safety assessment**, administered by the Department of Transport and Main Roads or an approved third party. This assessment would not require a “fitness to drive” declaration/standard.

Upon successful completion, individuals would be issued with an electronic **e-mobility- competency declaration**, permitting use of a personal mobility device or approved e-bike, whether privately owned or hired. For visitors to Queensland, this declaration could apply for a limited period (for example, 28 days), reducing unnecessary barriers for tourists and short-term users.

For longer-term users like daily commuters, the competency declaration could support the issue of a dedicated E class licence, allowing e-mobility use only, and remaining entirely separate from C class learner licensing.

This approach:

- Avoids excluding capable riders who cannot or choose not to obtain a driver licence due to disability, medical conditions or personal circumstances,
- Minimises disruption to shared e-mobility schemes, and
- Builds on existing Queensland frameworks such as the QRIDE competency- based- motorcycle licensing model.

Issue 2: Behaviour based enforcement is safer than blanket speed limits

RACQ did not recommend changes to footpath speed limits for legal e-mobility devices, and we cannot see a compelling policy rationale for implementing the committee’s recommendation of a change to a 10km/h default speed limit for personal mobility devices on footpaths, or for extending any default speed limit on footpaths or shared paths to bicycles or legal/approved e-bikes.

Community concern relating to e-mobility use is driven primarily by close interactions, near misses and unsafe rider behaviour - not speed in isolation. A rider travelling at 10 km/h can still cause serious injury to a pedestrian if they fail to give way or ride without due care.

RACQ therefore recommends retaining the existing approach, whereby local governments assess and signpost path speed limits on a case-by--case basis, supported by stronger enforcement of existing behavioural obligations.

In particular, RACQ supports increased Queensland Police Service enforcement of:

- Sections 250 and 253 of the *Transport Operations (Road Use Management) Regulation 2019*, requiring riders to give way to pedestrians; and
- Section 84AA of the *Transport Operations (Road Use Management) Act 1995*, which places an onus on riders to operate with due care around pedestrians.

RACQ further recommends amending the *State Penalties Enforcement Regulation 2014* to enable infringement notices to be issued for breaches of section 84AA of the *Transport Operations (Road Use Management) Act 1995*.

Focusing enforcement on rider behaviour directly addresses safety risk and pedestrian amenity. By contrast, a blanket 10 km/h limit risks displacing riders onto higher speed road environments or discouraging e-mobility- use altogether - outcomes that would increase traffic congestion and undermine active transport objectives.



The Royal Automobile Club of Queensland Limited ABN 72 009 660 575

2649 Logan Road, Eight Mile Plains, Qld 4113

PO Box 4, Springwood, Qld 4127

13 1905 racq.com

Assistance Banking Insurance Lifestyle

Finally, RACQ has also identified a concern with the drafting of the Bill relating to e-bike riders needing to attach a label that verifies EPAC compliance. There does not seem to be a practical means for existing owners to obtain and attach compliance labels as under the definition of 'compliance label' the 'compliance label' must be added by the 'manufacturer'. It seems impractical for existing owners to obtain an EPAC label from manufacturers.

This can be resolved by redefining 'compliance label' by removing the words 'added by the manufacturer' or limiting the EPAC compliance label requirement to retailers and the selling process. This would be the simplest approach because the Bill does not add any notable value to enforcement given that the mere attaching of a compliance label under the Bill does not actually confirm the e-bike's EPAC compliance.

Conclusion

Queensland has a genuine opportunity to lead nationally in the safe and sustainable integration of e-mobility. Achieving this requires regulation that is proportionate, targeted and aligned with actual risk. We commend the Committee for the work undertaken so far towards this goal and look forward to it helping the Government find the right balance through this Bill.

RACQ encourages the Committee to recommend amendments that preserve safety outcomes while maintaining accessible and practical mobility options for Queenslanders. We would welcome the opportunity to discuss this submission further.

Yours sincerely,

Josh Cooney
General Manager Advocacy
Email: [REDACTED]
Mobile: [REDACTED]