

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

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Submission By: Australian Electric Vehicle Association Ltd.

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State Development, Infrastructure and Works Committee
QUEENSLAND PARLIAMENTARY SERVICE
Parliament House
Cnr George and Alice Streets Brisbane Qld 4000

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

About the Australian Electric Vehicle Association (AEVA)

The AEVA is a volunteer-run, not-for-profit organisation dedicated to the full electrification of transport as quickly as possible. We represent the consumers and end-users of electric vehicle (EV) technology, whether as drivers, riders, commuters, or enthusiasts. Since 1973, our organisation has advanced the case for electrification of transport in all classes as a means to shield Australia from global fuel price shocks, eliminate road transport pollution, significantly reduce greenhouse gas emissions, and to enable more equitable and affordable transport for all Australians.

Our submission

On behalf of AEVA, I make the following submission in response to the proposed legislation: "Transport and Other Legislation (Managing E-mobility Use and Protecting Our Communities) Amendment Bill 2026".

AEVA acknowledges the scale of the safety challenge this Bill is endeavouring to address. AEVA believes the bill can be improved to address these concerns while still encouraging the safe uptake of e-rideables. AEVA has long championed small, efficient electric personal mobility devices as their use reduces road traffic and has many economic, well-being and environmental benefits.

For clarity, we note that the proposed Bill aligns Queensland's e-bike definitions with the EN 15194 standard, which defines the boundary between an electrically assisted pedal cycle and a motor vehicle. EN 15194 does not cover E-scooters or other personal mobility devices operating at or below 25 km/h and 250W. However, when used legally, these devices are treated as equivalent to bicycles under the traffic legislation of every other Australian state and territory. For consistency, our submission is that EN 15194 compliant e-bikes and low powered / low speed e-rideables should not face greater regulatory barriers than bicycles themselves.

Key statements

- ❖ **AEVA fundamentally opposes the proposed requirement for a motor vehicle license or learner's permit to operate any EN 15194 compliant e-bike or similarly rated e-rideable.** E-bikes and regular, human-propelled bicycles are currently equal under the law. Considering that it is possible to exceed 25 km/h with human power alone, this remains an entirely reasonable equation. Likewise, any e-mobility device such as a scooter, skateboard or unicycle which cannot exceed 25 km/h on level ground should also not require a licence, particularly as these devices are used on shared paths where the risk of collision with an automobile is eliminated. We are concerned that this proposed requirement would only impede non-car mode share growth.



- ❖ **We are concerned the age restriction for any e-mobility device is needlessly strict and would prove difficult to enforce in practice.** We fear this could lead to unnecessary targeting of Queensland youth who enjoy social rides with their friends. It is incumbent upon parents and guardians to use their discretion, as always, when considering activities for children under their care. The risk profiles of a compliant e-bike and a regular bicycle are practically identical, and bicycles have no age limit. This proposed age restriction would further stigmatise active transport as ‘dangerous’ and prevent mode shift.
- ❖ **AEVA also believes the existing legislation and penalty framework for unlawful behaviour is already sufficient,** and police do not need any additional powers to continue their enforcement of the traffic code. Additional powers risk miscarriages of justice in complex situations and are most likely to discourage Queenslanders from taking up an e-mobility device for their next trip. The seizure of ‘illegal’ mobility devices is already possible under existing regulations, regardless of the fuel source.
- ❖ **The goal of any state legislation which defines e-bikes and related e-mobility devices should be consistent with other states and territories.** It is the view of AEVA that a compliant e-rideable is any electrically powered or power-assisting device which has a maximum speed on level ground of 25 km/h. These may be ridden anywhere bicycles are currently allowed, including shared paths and public roads. We believe that the rated power of the device should not be used as a defining characteristic as it is often difficult to confirm on the spot, and it also limits the effective uptake of e-cargo bikes (see below). Speed is the primary safety concern and is the easiest to monitor and enforce.
- ❖ **The 10 km/h limitation for any e-mobility device on shared paths is too slow** and would effectively discourage their use, particularly since bicycles may be ridden substantially faster. We do agree though, that 10 km/h is a reasonable speed limit for footpaths, or places where pedestrians dominate the mode share. Any such limit will require substantial enforcement in pedestrian-dense environments and probably require some form of speedometer on each device.
- ❖ AEVA recommends the Queensland Government **consider a new ‘light moped’ category for e-rideables capable of exceeding 25 km/h, but no faster than 45 km/h.** These should be limited to use on streets and roads and may be registered as a ‘one-off’ at purchase for the purposes of rider accountability. This may also include a compulsory third party insurance component, and some form of motor vehicle licence (or learner’s permit) to operate the vehicle. We believe there are many compelling but currently non-compliant e-rideables that would fall within this category, but which are too slow to be considered mopeds or motorcycles. This category proposal is currently under consideration in Western Australia.
- ❖ **AEVA opposes efforts to ban the importation of any e-bike or e-rideable, regardless of its intended use.** If an e-rideable is deemed non-compliant under the traffic code, *it should be given a pathway to become compliant*, either as a light moped, as proposed above, or regular moped or motorcycle, as defined under existing legislation. The prevalence of off-road electric motorcycles mirrors the prevalence of petrol dirt bikes, which are also perfectly legal to import and use on private land. Just like petrol motorbikes, they may be inspected by an engineer, registered and licensed as ADR-compliant motor vehicles, and operated by suitably licensed riders. AEVA supports efforts to improve and streamline this process for any electric moped or motorcycle built in, or imported into, Australia.

More detail on our responses to the proposed Bill amendments

Our primary concern with this proposed legislation amendment relates to the high potential for a negative impact on e-mobility ridership. We accept that the motivation for these revisions is the



result of ever-increasing injuries from accidents with e-mobility devices and appreciate this is a serious concern. Our proposals do not materially impact risk but avoid creating further barriers to non-car transport options in Queensland, as car transport also comes with significant acute and chronic health issues.

1. Licensing

Of particular concern is the proposal to require all riders of compliant devices (including e-bikes) **carry a motor vehicle license or learner's permit**. We feel this is an unnecessary burden on the uptake of non-car e-mobility which will likely deter potential new users, particularly international visitors who may not have a driver's license but are entirely comfortable on two wheels. Moreover, it is entirely possible to grow up within 20 km of Brisbane CBD and access all key amenities by bike, or public transport, and never obtain a driver's license.

If a device meets EN 15194, it is a bicycle by definition, and no Australian jurisdiction requires licensing of bicycles, nor should they. A compliant e-bike is broadly one which has a maximum powered speed of 25 km/h (about 5 times the speed of walking) and is only activated when the pedals are being cranked. Requiring a licence for devices that are EN 15194-compliant contradicts the purpose of adopting that standard. In every Australian state and territory, e-bikes and regular un-powered bicycles are treated the same under the relevant traffic code. This reflects the comparative risk to operators being practically identical.

Requiring a license also entrenches 'motor-normativity' - the perception that driving a motor car is the 'normal' way of traversing a city, and that anything else is unusual. Entrenched attitudes around the car as the primary mode of transport have created the very situation we find ourselves in - congestion, pollution, urban sprawl, road trauma and chronic health impacts, are all the product of putting the motor car at the centre of all planning decisions.

Companies offering rental e-bikes and other compliant e-mobility devices such as scooters should be responsible for ensuring the riders are deemed competent and meet the age restrictions as eventually determined by the parliament. Likewise, should faster e-rideables and light mopeds be granted a legal status (see below) any company offering rentals should be obliged to ensure the riders have a relevant motor vehicle license.

2. Age restriction for compliant e-rideables

No Australian state or territory sets a minimum age for riding a compliant e-bike (one meeting EN 15194, with pedal assist limited to 25 km/h). This is consistent with how the law treats conventional bicycles: children of any age may ride them, with parents and guardians responsible for deciding when a child is ready. Queensland should maintain this approach. Imposing an age restriction on compliant e-bikes would create an anomaly, treating them differently from legally equivalent conventional bicycles.

For other compliant e-rideables, such as e-scooters and e-skateboards (also limited to 25 km/h), AEVA's preferred position is that no age restriction is necessary. These devices operate at the same maximum speeds as bicycles and compliant e-bikes, and parental responsibility remains the appropriate mechanism for managing children's use.

We recognise, however, that a minimum age of 16 for these devices is the established norm across most Australian jurisdictions, including WA, Victoria, South Australia, and Tasmania. Queensland's current rules already set age 16, with supervised riding permitted from age 12. If the Committee considers a minimum age warranted for non-e-bike e-rideables, maintaining alignment at 16 would preserve national consistency.



For devices capable of exceeding 25 km/h, AEVA supports both age and licence requirements, as discussed in section 6.

3. Labelling

AEVA supports mandatory compliance labelling of e-bikes that meet EN 15194, for peace of mind to customers, retailers and importers.

AEVA also supports compliance testing and labelling of other e-rideables (scooters and skateboards) ensuring consistency with other states and territories, including a maximum speed of 25 km/h and an agreed maximum unladen mass. (Longer-range scooters will be necessarily heavier and should be factored into any mass limits.)

Electric Cargo Bikes have their own equivalent standard, EN 17860. Electric cargo bikes are an excellent alternative to car ownership and are becoming more popular for transporting children to and from school and by businesses ferrying goods in suburban settings. These use cases should be considered. An electric cargo bike can carry substantially heavier loads, sometimes higher than 100 kg (such as a rider with two children and luggage), and so often have motors >250W. This is outside the EN 15194 standard. The EN 17860 standard sets essential requirements for frame strength, braking, stability, and electrical safety, and differentiates between commercial and private use.

Australian governments should endorse EN 17860 to increase consumer confidence. In Queensland this could be achieved by formally recognizing the standard within the existing special circumstances permit framework *Transport Operations (Road Use Management - Accreditation and Other Provisions) Regulation 2015* (AOP Regulation).

4. 10 km/h speed limit on shared paths is too slow.

This speed limit would largely restrict Queenslanders from using active transport for local trips and would entrench cars for even short journeys. Transport and Main Roads has already established that 10 km/h is difficult for most cyclists to maintain, with 20-25 km/h being a typical median speed for an average cyclist. 10 km/h is a reasonable speed limitation for areas with high pedestrian density, but the vast majority of Queensland's active transport infrastructure has been engineered for both pedestrians and bicycles. 25 km/h as a maximum speed on shared paths is safe and gives both pedestrians and riders enough time to avert a collision should one present. For example, the increase in speed on Brisbane's Kurilpa bridge to 20 km/h reflects this reality.

5. Unlawful and reckless behaviour

AEVA has no opposition to existing laws around unlawful and reckless behaviour, and penalties for riding while under the influence of drugs and alcohol. However, the risk profile of a reckless rider on a compliant e-bike or e-scooter is significantly lower than for drivers of 2-tonne motor vehicles at speed, and that penalties for transgressions should reflect this disparity.

6. Light Mopeds

Electric mobility devices that exceed 25 km/h, but no more than 45 km/h may not be operated on shared paths or public roads under current legislation, yet they offer a compelling alternative to car-centric private transport. AEVA supports the creation of a light moped category for electric bikes and e-rideables that fall in this segment. A reasonable set of conditions for their use would include:

- A maximum powered speed of 45 km/h.
- Only permitted on roads and streets (not shared paths).



- Maximum kerb weight of 70 kg.
- Full set of reflectors, front white and rear red lights for night riding.
- Bell or horn for alerting other road users.
- Throttle-activated OK, pedals optional.
- Robust brakes capable of stopping within 15 m from top speed (-5 m/s^2).
- Rider must at least wear a bicycle helmet.
- Rider must at least have a learners permit for a motor vehicle license.
- Some form of compulsory third party insurance may be recorded and held through a one-off registration fee.

7. Cross-jurisdictional comparison

AEVA has prepared a cross-jurisdictional comparison of e-rideable regulations across all eight Australian jurisdictions, which we attach to this submission for the Committee's reference. The comparison includes both current Queensland rules and the proposed changes under this Bill, enabling direct assessment of where Queensland would sit relative to other states.

Conclusion

Our association appreciates this opportunity to make a submission on these proposed legislative amendments. We are willing to meet to discuss our submission further, or to present in a public hearing if needed.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'James Pickering', is written over a horizontal line.

James Pickering
President, National Board
Australian Electric Vehicle Association
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M: [REDACTED]

Attachment 1: Australian E-Rideable Regulations: Cross-Jurisdictional Comparison

Australian E-Rideable Regulations: Cross-Jurisdictional Comparison

Including current Queensland rules and proposed changes under the Transport and Other Legislation (Managing E-mobility Use and Protecting Our Communities) Amendment Bill 2026.

Shaded column with orange border = proposed QLD changes. Cells where the proposed rule differs from current QLD rules are shown in bold orange text.

Table 1: E-Scooters and Personal Mobility Devices

Parameter	WA	VIC	NSW	QLD (current)	QLD (proposed)	SA	ACT	TAS	NT
Private e-scooters legal?	Yes	Yes	No – private property only	Yes	Yes	Yes (Jul 2025)	Yes	Yes	No – shared only
Max device weight (unladen)	25 kg	45 kg	N/A	60 kg	Revised dimensional limits	45 kg	60 kg	45 kg	N/A
Max hardware speed	25 km/h	25 km/h	N/A	25 km/h	25 km/h (reinstated as mandatory)	25 km/h	25 km/h	25 km/h	15 km/h
Footpath speed limit	10 km/h	Prohibited	Prohibited	12 km/h	10 km/h (1 from 12)	10 km/h	15 km/h	15 km/h	Trials only
Shared/separated path speed	25 km/h	20 km/h	10 km/h (trials)	25 km/h (separated); 12 km/h (shared)	10 km/h default (footpaths/shared paths); 25 km/h on dedicated cycleways; higher limits where signed	25 km/h (separated); 10 km/h (shared)	25 km/h	25 km/h	15 km/h
Road access	≤50 km/h (no dividing line)	≤60 km/h	≤50 km/h (trials)	≤50 km/h (no dividing line); any separated bike lane	≤60 km/h (any road) (↑ from 50; dividing line restriction removed)	≤50 km/h; e-scooters in 60 km/h bike lanes	No (unless no path)	≤50 km/h (no dividing line)	<50 m only
Minimum rider age	16	16	16 (trials)	16 (12–15 supervised)	16 (low-powered toy scooters exempt)	16	No hard min (u12 supervised)	16 (u16 OK if ≤200W)	18
Licence required?	No	No	No	No	Yes – learner licence min (\$77.55/3yr); interstate/overseas licences accepted	No	No	No	No
Sale to under-16s prohibited?	No	No	No	No	Yes	No	No	No	No
Prohibited bike seizure/disposal?	Yes (confiscation)	Yes (impounding)	Yes (confiscation)	Limited	Yes – new admin framework for seizure, forfeiture, disposal	No specific framework	No specific framework	No specific framework	No specific framework
Drink/drug riding framework?	Yes	Yes (0.05 BAC; interlock consequences)	Yes (0.05 BAC, trials)	Yes	Yes – extended/strengthened	Yes	Yes	Yes	Yes (trials)

Table 2: E-Bike Compliance Standard (National)

EN 15194:2017 applies nationally. Key parameters: 250W continuous, pedal-assist only, cut-off at 25 km/h, throttle limited to 6 km/h walk-assist.

NSW transitional: existing 500W e-bikes grandfathered to March 2029; from Feb 2026, new e-bikes sold must be certified to EN 15194. Anti-tampering provisions have been proposed federally (Safer E-Bikes Bill 2025) but not yet enacted.

The QLD Bill introduces mandatory compliance labelling for EPACs (e-bikes) and, uniquely among Australian jurisdictions, requires riders of fully EN 15194-compliant e-bikes to hold a driver licence (learner minimum) and be aged 16+. All other jurisdictions treat compliant e-bikes as bicycles with no licence requirement.

Table 3: Electric Moped Licensing Requirements

Electric moped = motor ≤4,000W, max speed 50 km/h. Must be registered and insured in all jurisdictions. The QLD Bill does not change moped licensing (C-class remains sufficient). No pillion restriction unchanged.

Parameter	WA	VIC	NSW	QLD (current)	QLD (proposed)	SA	ACT	TAS	NT
C-class (car) licence sufficient?	Yes	No	No	Yes (no pillion)	No change – Yes (no pillion)	Yes	No	No	Yes
Motorcycle licence required?	No	Yes – 2-day course	Yes – 2-day course	No	No change	No	Yes	Yes – multi-day	No
Approx. cost to obtain riding authority	Nil (C-class)	\$500–\$600	\$400–\$600	Nil (C-class)	No change	Nil (licence held)	\$400–\$500	\$400–\$600	Nil (C-class)

Notes

1. QLD proposed: The Transport and Other Legislation (Managing E-mobility Use and Protecting Our Communities) Amendment Bill 2026 was introduced 25 March 2026 and referred to the State Development, Infrastructure and Works Committee (report due 8 May 2026). Submissions close 10 April 2026. Expected commencement 1 July 2026 with six-month transition.
2. QLD path speeds: The 10 km/h limit is a default applying to footpaths and shared paths where pedestrians are present. It does not apply to dedicated bicycle lanes or cycleways where pedestrians are prohibited. The default may also be displaced by speed limit signs or path markings, enabling councils to sign high-quality shared paths at higher speeds where safe. AEVA advocates clear criteria for such signage.
3. QLD licensing: The Bill requires riders to hold “a valid driver licence of any type or class,” making a learner licence (\$77.55/3yr, road rules knowledge test + eyesight test) the minimum. Interstate and overseas licences are accepted. The learner pathway is accessible to most current users, including those who have voluntarily surrendered a full licence. A residual gap exists for the small number of people medically disqualified from holding any licence class who nonetheless retain capacity to safely operate a low-speed device.
4. QLD age limit: The 16+ minimum and licensing requirements apply to EPACs (e-bikes) and PMDs. The Bill explicitly excludes “low-powered toy scooters” from the PMD definition and from the “prohibited bike” category, meaning children under 16 may continue to ride low-powered recreational devices (typically <200W, ≤10 km/h).
5. QLD transition: The Bill provides a 6-month transition period (from expected 1 July 2026 commencement) for existing devices to meet new compliance labelling (EPAC) and design-speed (PMD) requirements. The mechanism by which current owners demonstrate compliance during this window (e.g., software limiting) requires monitoring.
6. NSW: The e-micromobility Action Plan provides a pathway to legalising private e-scooters. Legislation not yet enacted as at March 2026. From Feb 2026, e-bikes sold in NSW must be certified to EN 15194; max power reduced from 500W to 250W.
7. SA: Statutes Amendment (Personal Mobility Devices) Act 2024 took effect 13 July 2025. First-year review pending.
8. AEVA welcomes corrections to any entry. This document is provided for verification and advocacy purposes and is not intended for public distribution in its current form.