

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

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**Submission By:** BYKKO

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

**The Bill includes globally unprecedented and misguided provisions with no effect on the safety of the users and it will cause serious harm to vulnerable communities, Australian and international tourists, cycling tourism economy and many Queensland families and businesses**

**Submission by BYKKO Pty Ltd**



Mr Jim McDonald

Chair, State Development, Infrastructure and Works Committee

Queensland Parliament

Cnr of George and Alice Streets, Brisbane QLD 4000

RE: Urgent Opposition to Proposed Driver Licence Requirement, Minimum Age Restriction for E-Bike Riders and the Proposed 10km/h speed limit on shared paths in Queensland

#### Executive Summary

BYKKO respectfully but strongly opposes the following specific provisions from the draft legislation:

1. All e-mobility devices including the electrically power-assisted cycles to be classified as “motor vehicles”
2. The requirement for e-bike riders to hold a driver's licence
3. Imposing a minimum riding age of 16 years
4. The proposed 10 km/h speed limit on footpaths, shared paths and key cycling routes

We support the remaining measures, particularly those targeting illegal, non-compliant high-powered devices.

The above-mentioned measures are misaligned with the evidence and with the safety problem they purport to solve. The incidents that prompted the Inquiry into e-mobility safety were caused by reckless user behaviour and illegal, over-powered devices — not by compliant electrically power-assisted e-bikes (max 250W, 25km/h) and millions of responsible riders. The proposed Bill is globally unprecedented, and will cause serious harm to vulnerable communities, Australian and international visitors, and Queensland families and businesses that have already invested in responsible, compliant e-bike fleets and infrastructure.

#### Key points:

- **Direct impact on BYKKO and other tourism operators:** BYKKO has invested significantly in developing a world-class, purpose-built, station-based e-bike hire infrastructure specifically designed for hotels, resorts, holiday parks, retirement villages and residential developments. A large proportion of the users at our partner locations across Cairns, Airlie Beach, Bowen, Yeppoon, Noosa, Gold Coast and conservation areas such as Mon Repos Turtle Centre are locals and international visitors who would be immediately excluded by a driver licence requirement. The damage extends well beyond BYKKO to every tour operator, hire company, hotel, resort, holiday park and lifestyle village offering e-bikes across the State.
- **Sustainable Travel at risk:** BYKKO has a significant pipeline of Queensland properties actively advancing e-bike hire infrastructure investment as part of their ESG policies and sustainable transport. These business cases are now collapsing: if a large number of local residents and international guests cannot legally ride an e-bike, the return of investment

rate cannot be met and projects are being abandoned. BYKKO investment, and that of our accommodation and tourism business partners, would be stranded.

- **Vulnerable Communities at risk:** More than 340,000 Queenslanders do not hold a driver's licence, including people with disabilities, older residents who have surrendered theirs, low-income individuals, migrant workers, and families using e-bikes as an affordable transport option. All would be denied access to lawful e-bike riding.
- **Safe cycling to schools will be affected:** The Parliamentary Inquiry acknowledged that introducing a minimum age of 16 for riders of PMDs and e-bikes will affect families whose children under 16 currently ride these devices legally. We submit 14-15 — the standard high school age — as a more reasonable minimum.
- **Unsafe speed limits:** The proposed 10km/h speed limit on footpaths, shared paths and cycling routes will significantly reduce the demand for recreational cycling, commuting and utilitarian trips. The recommendation will have an opposite effect on safety as bicycles become instable at lower speeds and the measure will push riders into high-speed, dangerous roads.
- **Cycling tourism economy at risk:** The average regional cycling tourism trip generates \$952 in visitor spend, with 78% of that spend in regional Queensland — the areas most dependent on tourism. Under the proposed reforms, local and international tourists who do not hold a driver's licence would be legally prohibited from riding an e-bike, participating in cycling events or bike tours with their own or hired e-bikes anywhere in Queensland.
- **Olympic Games readiness:** A significant proportion of the millions of international visitors expected for 2032 will not hold a driver's licence. Queensland would be the only Olympic host city in history to ban e-bike hire for athletes, delegates, media representatives and tourists without a driver licence. Queensland will be remembered — not as a world-class active destination — but as the place that had a driver licence requirement for a bicycle. The international reputational damage will outlast the Games.
- **International markets at risk:** A licence requirement disproportionately excludes Queensland's most valuable international cycling tourism visitors, while every other Australian state and country in the world continues to welcome them. As an example, China is one of Queensland's highest-spending inbound markets and in Top 3 for cycling tourism in Australia but approximately half of Chinese adults do not hold a driver's licence.
- **Global precedent:** Queensland would join only New Jersey and North Korea in requiring a driver's licence for a standard, compliant e-bike — a distinction that will feature prominently in international travel media.

We urge the Queensland Government to substantially amend the Bill, and direct enforcement resources at the illegal, non-compliant devices that actually caused the safety incidents this Bill was established to address.



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Dear Mr McDonald,

I am the CEO and founder of BYKKO, an Australian company that has invested significantly in developing a world-class, purpose-built, station-based e-bike hire infrastructure specifically designed for responsible e-bike deployment and use. Our fully compliant e-bikes and docking and charging stations enable hotels, resorts, holiday parks, retirement villages and residential developments across Australia, including Queensland to offer legal, compliant e-bikes to their guests, residents and staff members.

BYKKO currently manages more than 100 hubs of e-bikes and charging stations at the Queensland resorts across Cairns, Airlie Beach, Bowen, Capricorn Yeppoon, Woodgate, Noosa, Gold Coast and conservation areas such as Mon Repos Turtle Centre facilitating more than 20,000 e-bike hires per year, of which an estimated 35% are international visitors. We are also working with retirement villages to bring e-bikes to an older but active population, of which most of them already surrendered their driver licence.

We are deeply concerned by the Queensland Government's decision to support Recommendations 11,13 and 14 from the Parliamentary Inquiry into E-Mobility Safety and Use, which would require all electrically power-assisted cycles (also referred as EPAC, Pedelecs or EN15194-compliant e-bikes) to be classified as "motor vehicles", all e-bike riders to hold at least a Queensland Class C learner licence, be of a minimum 16 years of age, and the speed limited to 10km/h on footpaths and shared paths.

While we strongly support the measures targeting illegal, non-compliant high-powered devices — we urge the Government to reconsider these specific measures, which are misaligned with the safety concerns that prompted the Inquiry, and which will cause profound, unintended harm to Queensland's tourism industry, accommodation sector, and broader community.

EN 15194 compliant e-bikes should be legally treated as ordinary bicycles and integrated into everyday mobility. They should not require a driver's licence, registration, or insurance. Riders should simply follow the same rules that apply to cyclists.

## **1. A Driver Licence Requirement is Globally Unprecedented and Fundamentally Misguided**

If enacted, Queensland will become only the second jurisdiction in the world to require a driver's licence to ride standard, compliant e-bikes – Electrically Power-Assisted Cycles (max 250W, 25km/h). The only other jurisdictions with comparable requirements are New Jersey in the United States — a decision that attracted widespread condemnation — and North Korea but for the high-speed electric bikes capable of up to 40km/h. This is not a peer group that Queensland should aspire to join.

As the University of Queensland's Micromobility Research Cluster has noted, a driver's licence is a system designed to demonstrate competence operating a motor vehicle — not a bicycle or e-bike. A learner's licence test is conducted only in English, focuses entirely on motor vehicle road rules, and requires proof of identity and Queensland residency. It costs approximately \$77 and typically requires four to six hours of study (Source: <https://theconversation.com/should-e-bike-riders-be-required-to-have-a-drivers-licence-278207>)).

It equips riders with no relevant skills or knowledge for safe e-bike operation. Requiring it adds a bureaucratic burden while delivering zero safety benefit.

The safety incidents that prompted this Bill were overwhelmingly caused by non-compliant, illegally modified high-powered devices and e-scooters (PMD)— not by standard electrically power-assisted bicycles operating at 25km/h.



EN15194 compliant e-bikes have no power assistance at speeds higher than 25 km/hour, same as a normal pedal bike.

The riders of pedal bikes may travel at higher speeds than e-bike riders if they are fit and strong and they are not subjected to a driver licence requirement. None of them should.

The correct and targeted response is enforcement of existing laws against illegal devices, not sweeping restrictions on lawful, compliant e-bike riders.

## **2. Over 340,000 Queenslanders Will Be Disenfranchised by the Licencing Requirement**

According to the University of Queensland's research, approximately 7.5% of Queenslanders aged 16 and over — more than 340,000 people — do not hold a driver's licence. Across Australia, an estimated 1.5 million adults are without one (Source: <https://theconversation.com/should-e-bike-riders-be-required-to-have-a-drivers-licence-278207>).

The communities most dependent on e-bikes as accessible, affordable transport are precisely those least likely to hold a licence:

- People with disabilities who are unable or unwilling to obtain a licence but safely enjoy cycling on bike paths and shared paths
- Older Queenslanders who have responsibly surrendered their licence due to age but remain healthy and active by riding a bike
- Low-income individuals for whom the cost of licensing, lessons, and car ownership is prohibitive
- Aboriginal and Torres Strait Islander people, particularly in regional and remote areas, who face systemic barriers to licensing
- Migrant workers and international students whose overseas licences are not recognised in Australia or do not hold one
- Young people who rely on e-bikes for independent transport and commuting to school
- Individuals and families who are car-free by choice for financial, health, lifestyle or environmental reasons

For all of these people, the right to ride a safe, legal e-bike would be extinguished overnight. As Bicycle Queensland has observed, there are entire Queensland suburbs where up to 30% of households contain no licenced driver (Source: <https://bq.org.au/news/defend-safe-legal-e-bike-use/>) — precisely the communities where e-bikes provide a vital and dignified transport solution.

## **3. The Minimum Age of 16 is Disproportionate and Inconsistent with Evidence**

The proposal to set a minimum riding age of 16 years does not reflect where the evidence points. Teenagers have safely ridden legal e-bikes for decades. Legal, EN15194 compliant e-bikes will have no power assistance at higher speeds than 25 km/hour, same as a normal pedal bike.

The safety incidents that prompted the Inquiry were associated with illegal, over-powered e-motorbikes — not compliant 25km/h pedal-assist devices used by young people.

The Parliamentary Inquiry acknowledged that introducing a minimum age of 16 for riders of PMDs and e-bikes will affect families whose children under 16 currently ride these devices legally. Moreover, the committee concluded that compliant e-bikes and PMDs present significantly lower risks than the over-powered, high-speed devices currently available on the market.



Notably, Bicycle Queensland has recommended a threshold of 12 to 14 years as appropriate similar to other States' inquiries (Source: <https://bq.org.au/news/defend-safe-legal-e-bike-use/> ).

Setting the minimum age at 16 — equivalent to the learner driving age — and classifying a legal e-bike as a “motor vehicle” will prevent teenagers from safely cycling to school, reduce family recreational cycling, and push young people back into cars.

We submit that 14-15 years — the high-school age across Australia — is a more reasonable and evidence-based minimum, and urge the Government to conduct further expert consultation with schools and parents/carers before legislating at 16.

#### **4.The Maximum 10km/h Speed Limitation will Negatively Impact Safety**

The proposed 10 km/h speed limit on footpaths, shared paths and key cycling routes is impractical and may reduce safety. Research shows that bicycles become unstable at low speeds and can be challenging for the rider to balance and maintain equilibrium.

(Source:<https://www.sciencedirect.com/science/article/pii/S038611122600026#:~:text=Abstract,neer%20riders'%20control%20authority%20limits> )

Such a limit would force riders into high-speed roads where unexperienced riders will face increased danger of crashes. Moreover, the measure will significantly reduce the demand for cycling for recreation or commuting.

#### **5. The Driver Licence Impact on International Visitors Cannot Be Overstated**

Queensland welcomed over 2.4 million international visitors annually in the year ending 2025 (Source: <https://statements.qld.gov.au/statements/104756> ), and could receive an additional 4.3 million international arrivals between 2026 and 2032, when the Brisbane Olympics Games are held.

Under the proposed Bill, international tourists who do not hold a driver's licence would be legally prohibited from hiring an e-bike anywhere in Queensland.

For context, China is one of Queensland's most significant tourism markets but approximately half of all Chinese adults do not hold a driver's licence. Many European visitors — including from countries with excellent cycling cultures such as the Netherlands and Denmark — may not hold a car licence at all. This is not a hypothetical concern; it is a certain and foreseeable consequence.

Cycling tourism is already a significant and growing contributor to Queensland's economy. Queensland attracts a very high proportion of international cycling visitors who stay longer and spend more per trip than average tourists.

The average spend per cycle tourism trip in regional Queensland is \$952. Queensland accounts for 1 in 5 nights and dollars spent on cycling tourism nationally, despite representing only 16% of cycling trips — a direct reflection of the high-value, longer-stay international visitors this State attracts. (Source: [https://corporate.queenslandcountrytourism.com.au/images/TRA\\_Cycle-tourism-in-Australia\\_draft-report.pdf](https://corporate.queenslandcountrytourism.com.au/images/TRA_Cycle-tourism-in-Australia_draft-report.pdf) ).

Raising a licence barrier will send these visitors to other states and other countries and will most certainly attract widespread condemnation.

Queensland risks setting a damaging international precedent at a time when the world spotlight is firmly on Queensland in anticipation of the Brisbane Olympic Games.

## 6. The 2032 Olympic Games — A Once-in-a-Generation Opportunity

The Brisbane 2032 Olympic and Paralympic Games represent the single greatest tourism and destination marketing opportunity in Queensland's history. Hundreds of thousands of international visitors will arrive, many for the first time, forming impressions of Queensland that will shape travel decisions for decades. Active mobility — cycling, walking, outdoor adventure — is central to Queensland's destination brand and to the experience the State is seeking to deliver to Olympic visitors.

A substantial proportion of those Olympic visitors will not hold a Queensland driver's licence. Many will not hold any driver's licence at all. Under the proposed rules, a large number of delegates, athletes and their families, media visitors could not legally hire an e-bike at any Queensland resort or bike shop— while they could do so freely in every other city hosting or having hosted Olympic Games.

Queensland will be remembered — not as a world-class active destination — but as the place that had a driver licence requirement for a bicycle.

The reputational damage from this policy will not be contained to a single news cycle. It will be embedded in travel reviews, social media posts, international tourism guides, and the lived memories of visitors who were turned away.

## 7. BYKKO's Investment Demonstrates What Responsible Innovation Looks Like

BYKKO has invested in developing a purpose-built, rental-specific e-bike — more robust, more heavily monitored, and more comprehensively managed than anything available in the consumer market. Our proprietary management and controls software governs every bike in real time: governing speed, power, triggering maintenance alerts, and providing properties with complete operational visibility.

Our world-leading docking station technology — deployed at scale across Queensland accommodation and residential properties in a first for Australia — provides secure, managed parking and charging infrastructure that eliminates the risks associated with unmanaged bike storage and unsafe batteries. Every BYKKO hub is a fully-managed, compliant, professionally operated facility. This is not the product of the e-mobility safety crisis. This is its solution.

If this requirement is enacted, our clients — accommodation providers throughout Queensland — will have no lawful means to offer e-bike hire to the majority of their international guests or to Australian families who are car-free by choice for financial, health, lifestyle or environmental reasons.

Applying a driver's licence requirement to BYKKO's platform — and to the businesses that have partnered with us — does not improve safety. It eliminates access and it removes a product that represents exactly what responsible, compliant, user-safe e-bike deployment looks like.

The damage extends well beyond BYKKO to every tour operator, hire company, hotel, resort, holiday park and lifestyle village offering e-bikes across the State.





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## **Our Recommendations**

We respectfully urge the Queensland Government to substantially amend the Bill:

- Remove the driver licence requirement for riders of legal, compliant Electrically Power Assisted Cycle (max 250W/25km/h)
- Revise the proposed minimum age of 16 downward, and commission expert consultation to determine an evidence-based threshold, with 14-15 years as a reasonable starting position
- Remove the classification as “motor vehicle” for legal, compliant e-bikes
- Remove the 10km/hr blanket speed limit on footpaths and shared paths
- Invest in targeted rider education programs specific to legal and safe e-bike operation

We would welcome the opportunity to engage with the Committee and relevant agencies to discuss these concerns further.

BYKKO and the broader accommodation and tourism sector stand ready to work constructively with the Government to achieve genuine safety improvements without unnecessarily destroying Queensland's bike tourism economy and a sustainable mode of travel.

Yours sincerely,

Monica Zarafu

CEO & Founder, BYKKO

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