

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

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**Submission By:** Caravan Parks Association of Queensland

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E-BIKES FOR HIRE AT A CARAVAN PARK  
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# Submission to the Transport and Other Legislation Amendment Bill 2026

CARAVAN PARKS ASSOCIATION OF QUEENSLAND (CPAQ)  
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Submitted by: Caravan Parks Association of Queensland

Date: 9 April 2026

## Introduction

Caravan Parks Association of Queensland (CPAQ) welcomes the opportunity to provide input on the *Transport and Other Legislation (Managing E-mobility Use and Protecting Our Communities) Amendment Bill 2026*.

CPAQ is the peak body representing caravan and residential parks across Queensland. Our members operate in high-use tourism and/or residential environments that are legally defined as public roads, but function as shared, mixed-use spaces with unique safety and operational considerations.

We support the intent of the Bill to improve safety outcomes and address the risks associated with unsafe and non-compliant e-mobility devices. Our members experience these risks firsthand, particularly in relation to e-scooters and high-powered devices. However, we are concerned that the proposed approach does not sufficiently differentiate between high-risk devices and compliant pedal-assist e-bikes. This may result in unintended impacts on tourism, accessibility and small business operations.

CPAQ supports stronger regulation of high-risk and non-compliant devices but does not support the inclusions of, nor the application of licensing and similar controls to, compliant pedal-assist e-bikes.

## Recommendations

CPAQ recommends that the Bill be amended to:

- Provide a clear exemption for EN15194 compliant pedal assisted e-bikes, recognising their equivalence to traditional bicycles, and removing the need for driver licensing requirements.
- Adopt a risk-based approach to minimum age requirements, allowing supervised use in low-risk environments such as rail trails and ecotourism activities.
- Clarify and appropriately define “shared paths” to:
  - include park internal roads and similar high-use, low-speed, high pedestrian use environments, where reduced speed limits support safety outcomes; and
  - exclude rail trails and dedicated cycle paths, where higher cycling speeds are expected and appropriate.
- Maintain and strengthen provisions relating to e-scooters and other high-risk devices, where safety concerns are well established.



## Role of compliant e-bikes

Legal, compliant power-assisted pedal cycles (250W, 25km/h) are an important part of Queensland's mobility mix. These devices:

- Operate in a manner comparable to traditional bicycles in terms of speed
- Support active travel at a time when cost-of-living pressures are impacting transport choices
- Provide a practical and accessible mobility option for a wide range of users, including older Australians

### TOURISM PARKS

For the caravan and residential parks sector, e-bikes have become a common and valuable tool for visitors travelling with caravans and motorhomes. Guests typically park their recreational vehicle and use e-bikes to explore local destinations without the need to manoeuvre large vehicles or secure parking.

This supports:

- Longer stays
- Increased local visitation and spend
- Greater accessibility for older travellers, children and those with limited mobility

Some caravan and residential parks currently offer e-bike hire as part of their service offering. This provides a modest but important additional revenue stream, particularly at a time when operators are managing rising costs.

### RESIDENTIAL PARKS

In addition to their role in tourism, compliant e-bikes also provide an important transport option for residents living within caravan and residential parks.

Many residents are on fixed or low incomes and may not have access to a private vehicle or hold a current driver licence. In this context, e-bikes can provide a practical and affordable means of accessing essential services, including shops, medical appointments and community facilities.

In the past, this role may have been fulfilled by a traditional bicycle. However, for residents located some distance from services, or in areas with challenging terrain, standard bicycles are not always a viable option. Pedal-assist e-bikes help overcome these barriers by enabling longer distances to be travelled with less physical strain.

Introducing licence requirements for compliant e-bikes risks disproportionately impacting these residents by removing a safe, low-cost and accessible transport option, particularly in regional areas where alternative transport choices are limited.

## Unintended impacts of the proposed approach

CPAQ is concerned that the proposed licensing and age requirements for compliant e-bikes will have unintended consequences for tourism and accessibility.



## TOURISM AND REGIONAL IMPACTS

Restrictions on the use of compliant e-bikes may reduce the appeal of parks located near rail trails, cycle paths and coastal recreation areas. This would result in shorter visitor stays and reduced repeat visitation – particularly from older travellers. This in turn would have a flow onto the regional economy in terms of visitor spend.

## ACCESSIBILITY AND INCLUSION

E-bike users within caravan and residential parks include older Australians who rely on pedal-assist technology to maintain independence. The introduction of licence requirements and age restrictions risks excluding:

- Older individuals who no longer hold a driver licence
- Visitors who rely on e-bikes as a low-impact mobility aid

## OPERATIONAL IMPACTS ON PARK OWNERS

Many parks hire or loan e-bikes to guests as part of the visitor experience. Under the proposed framework, park owners may be required to verify licences and age eligibility. This creates a regulatory burden on small businesses that are not equipped or authorised to act as enforcement bodies and introduces additional administrative overhead at a time when operating costs are increasing.

## Regulatory inconsistency and tourism risk

CPAQ notes that inconsistency across jurisdictions is already creating practical challenges for park owners and visitors. As outlined in our [previous submission](#) to the Inquiry into e-mobility safety and use in Queensland, members report ongoing difficulty navigating differing rules between states, particularly as they evolve.

For the caravan and residential parks sector:

- Visitors frequently travel across multiple states within a single trip
- Travel decisions, including what equipment to bring, are made prior to arrival in Queensland

This creates a high likelihood of unintentional non-compliance, places an impractical burden on park owners to interpret and explain jurisdiction-specific rules, and risks undermining Queensland's reputation as a leading and accessible holiday destination.

## Key issues requiring clarification

### LACK OF DIFFERENTIATION BETWEEN DEVICE TYPES

The Bill does not sufficiently distinguish between low risk, compliant pedal-assist e-bikes and higher-risk or non-compliant devices. A more targeted, risk-based approach is required to ensure regulatory effort is focused where it is most needed.



## LICENSING AND AGE REQUIREMENTS

Applying licensing requirements to compliant pedal assisted e-bikes is inconsistent with their treatment as bicycles and introduces unnecessary barriers to use.

The Explanatory Notes acknowledge that the purpose is to ensure “basic road rule knowledge”. While this is understandable, it is not relevant in all use cases. For example, on a rail trail, which is off-road, low-risk, separated from traffic, and has its own code of conduct, no road rule knowledge is necessary.

## DEFINITION AND APPLICATION OF SHARED PATHS

The Bill applies a 10 km/h speed limit to “shared paths”, however the definition and application of this term requires clarification in practice.

Caravan and residential parks operate as low-speed, mixed-use environments with high volumes of pedestrians, including children and older Australians. While these environments share many of the characteristics of shared paths, they are unlikely to be captured under the current definition. Similar issues arise in other high-traffic, low-speed environments such as shopping centre car parks.

CPAQ’s position is that these environments should be explicitly recognised within the regulatory framework as shared, low-speed areas where reduced speed limits apply. Extending the intent of shared path provisions to include caravan and residential park internal roads and similar environments would support safer outcomes and provide clarity for both users and operators.

At the same time, care must be taken to ensure that shared path provisions are not applied too broadly. Rail trails and dedicated cycle paths are key tourism assets designed for continuous movement and higher cycling speeds. Applying a 10 km/h limit in these environments would be inconsistent with their intended use and would create a situation where compliant e-bikes are subject to more restrictive conditions than traditional bicycles.

CPAQ considers that shared path speed limits should be primarily applied to footpaths and similar pedestrian-dominated environments, where interaction between users is highest and risk is greatest.

## CPAQ position on e-scooters

CPAQ supports the intent of the Bill as it relates to e-scooters and other high-risk devices. Our members continue to report significant challenges associated with these devices, including injuries, near misses and unsafe behaviour within parks. Stronger regulatory controls and enforcement on these devices are supported.

## Conclusion

CPAQ supports the objective of improving safety outcomes for e-mobility in Queensland. However, achieving this outcome requires a balanced and proportionate approach that distinguishes between high-risk devices and compliant, low-risk mobility options.



Without this distinction, there is a risk of unintended impacts on tourism, accessibility and small business viability, particularly within caravan and residential parks and the communities they support.

We welcome the opportunity to work with government to ensure that regulatory settings are practical, enforceable and aligned with the realities of tourism environments across Queensland.

## About Us

Caravan Parks Association of Queensland (CPAQ) is the peak body representing caravan and residential parks (parks) across Queensland. Established in 1966, CPAQ is the recognised industry voice on matters affecting the operation, regulation and sustainability of parks throughout the State.

Our members operate parks in metropolitan, regional and remote communities, providing essential tourism accommodation and long-term housing solutions. The sector plays a significant role in supporting regional economies, local employment and visitor dispersal across the state.

CPAQ works closely with all levels of government to advocate for fair, practical and evidence-based regulation. We are committed to supporting our members to deliver exceptional guest experiences while fostering sustainable growth and regulatory settings that reflect the operational realities of caravan and residential parks.

## FOR MORE INFORMATION

For more information regarding this submission, please contact Michelle Weston, Chief Executive Officer of Caravan Parks Association of Queensland (CPAQ):

- **ABN:** 75 688 493 704
- **Address:** Unit 9, 10 Hudson Road, Albion Qld 4010
- **Post:** PO Box 880, Lutwyche Qld 4030
- **Phone:** 07 3862 1833 (opt 2)
- **Email:** [REDACTED]
- **Website:** [cpaq.au](http://cpaq.au)

## References

Caravan Parks Association of Queensland, Submission to the Inquiry into e-mobility safety and use in Queensland, June 2025 (Submission 1121: <https://www.parliament.qld.gov.au/Work-of-Committees/Committees/Committee-Details?cid=0&id=4522>)