

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

Submission No: 1919

Submission By: Lug+Carrie Pty Ltd

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

9th of April, 2026

To Whom It May Concern,

This submission is in response to the *Transport and Other Legislation Amendment Bill 2026* that was introduced into the Queensland Parliament on 25 March 2026 by the Hon Brent Mickelberg MP, Minister for Transport and Main Roads.

Lug+Carrie is a leading provider of Electrically Power-Assisted Cycle (EPAC) eBikes in Queensland, offering both sales and subscription services. We currently have a community of more than 500 people - mostly parents with young children - riding a Lug & Carrie eBike in Queensland. We are an Australian company and operate with the highest safety standards, *exclusively using Bosch systems, which are renowned for their safety and quality*. We are deeply invested in promoting eBikes as a safe, accessible and sustainable transport solution and have worked with local and state governments across Australia to increase the number of people replacing car trips with eBikes.

We strongly endorse the Queensland government's commitment to increase safety on roads and footpaths for all Queenslanders by addressing the current safety crisis induced by dangerous and non compliant e-mobility devices. The Australian eBike industry has suffered from the influx of illegal and unsafe eBikes, leading to a public discourse that understands all eBikes as dangerous. At a time, where EPAC eBikes in many countries worldwide are enabling a significant shift from car travel to active travel, this is unfortunate. The regulatory insecurity around eBike usage could, in turn, lead to job losses across the industry, including within our company.

We believe that the current bill is therefore not the right response to address the current safety crisis and requires significant review as the draft law will make ALL eBike use significantly harder, including the use of safe and legal EPACs.

Specifically, we highlight the following concerns:

- **Mandatory licence-holding for riders**

Introducing a mandatory licence for eBike users unnecessarily links cycling to driving and creates barriers to access. It would exclude or discourage many people who currently rely on eBikes as an alternative to a private vehicle, including seniors, people with disabilities, and tourists, as well as others who do not hold a driver's licence. Cycling has always been a simple, low-barrier form of transport, and adding licensing requirements risks undermining that accessibility while discouraging uptake, without clear evidence of improved safety outcomes.

- **10kph limit on footpaths and shared paths**

A 10kph speed limit on shared paths is impractical and out of step with how other countries successfully manage the use of shared spaces. At that speed, it's difficult for all cyclists to ride a bike safely and maintain balance. This risks widespread non-compliance and makes the rule hard to enforce. It is also unclear whether most of Queensland's shared paths are actually 'footpaths', under existing legislation. This would be putting a 10km/h speed limit on almost every shared path, riverside and foreshore path, and long-distance rail trail in the entire state. Introducing a limit like this would discourage people from riding, push more cyclists onto roads, or lead them to stop riding altogether.

- **The inclusion of EN15194 2017:A1 as the new eBike definition**

We acknowledge and support the inclusion of the European EPAC standard EN 15194:2017 within the proposed eBike definition. The extension to incorporate EN 15194:2017+A1:2023 represents an important and necessary evolution of the standard. However, we submit that the application of the updated standard should be **limited to the selling of new eBikes on the market and introduced with an appropriate transition period**. Many existing eBikes currently in use were manufactured in compliance with EN 15194:2017 and continue to operate safely within its parameters. **Applying the updated EN 15194:2017+A1 requirements**

retrospectively unnecessarily excludes a vast majority of eBikes currently used by Queenslanders.

We urge the Queensland Government to consider alternative measures that balance safety concerns with the agenda to promote safe eBike use and cycling as a form of accessible and sustainable transport.

Thank you for the opportunity to provide this submission. We are available to discuss this matter further and contribute to a balanced and forward-thinking regulatory framework.

Sincerely,

Benjamin Carr

A handwritten signature in black ink, appearing to read 'Benjamin Carr', with a stylized, cursive script.

Director and Co-founder of Lug+Carrie

Audit trail

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