

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

**Submission No:** 1920

**Submission By:** North Brisbane Dirt Girls

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## **Submission to the State Development, Infrastructure and Works Committee**

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

**From:** North Brisbane Dirt Girls (Committee level approval)

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### **Introduction**

The North Brisbane Dirt Girls (Dirt Girls), a women's subgroup of the North Brisbane Mountain Bike Club (NBMBC), is a dedicated and active community of female riders who are passionate about ensuring that mountain biking is accessible, sustainable, and empowering for female riders.

The Dirt Girls support the intent and many of the proposed changes in the *Transport and Other Legislation (Managing E-mobility Use and Protecting Our Communities) Amendment Bill 2026* (TOLA Bill), however we have significant concerns that some of the proposed amendments will have severe negative consequences for cyclists in Queensland, and disproportionate impacts on women mountain bikers in particular.

For clarity, this submission uses the term e-MTB or e-bike to refer to a legally compliant pedal-assist e-bike limited to 250 watts and motor assistance to 25 km/h. The term e-moto is used to refer to devices that do not comply with those limits, and are capable of much higher speeds, often (but not always) controlled by a throttle. Dirt Girls does not support the use of e-motos in public spaces, other than in a regulated manner on roads.

### **A female perspective on e-bikes**

The popularity and availability of e-bikes has risen since 2018, and this has been reflected in the proportion of e-MTBs to non-electric MTBs (colloquially known as 'analogue' bikes) being ridden Queensland's mountain biking trails.

E-MTBs have been particularly transformative for the women's mountain biking community. E-bikes have made the sport more accessible to women who may otherwise be excluded due to time constraints, fitness levels or health issues. For many of our members, e-MTBs facilitate regular participation in group rides, development of mountain biking skills, more frequent riding, including commuting to work, and spending time outdoors with friends and family. For many of the Dirt Girls, having an e-bike is the difference between riding or not.

E-MTBs are particularly valuable for women who have limited time to ride due to work, family, or caregiving responsibilities. E-bikes allow women to ride more frequently, for longer distances, on steeper climbs, and more challenging terrain. This has significantly

improved the accessibility of the sport by reducing physical demands while maintaining the many physical and mental health benefits associated with cycling.



*Riders from Dirt Girls at the 2025 Chicks in the Sticks cross-country enduro race. Five of the nine women pictured ride e-MTBs.*

Dirt Girls riders have a high proportion of e-MTBs compared to analogue MTBs (approximately 3:2); this is noticeably higher than the proportion of e-MTB to analogue MTBs within the greater NBMBC. This is why the Dirt Girls, and female mountain bikers within Queensland are concerned that they will experience disproportionately greater negative impacts from the proposed e-bike legislation, compared to male mountain bikers.

### **Why e-bikes are so important to women**

Access to, and use of, e-bikes is particularly important to women for several reasons:

- **Family and caregiving responsibilities:** Women often juggle caregiving duties alongside work and other responsibilities, leaving limited time for recreation. E-bikes enable women to maximise their recreation time and maintain an active lifestyle.
- **Physical fitness and health challenges:** Many women face unique physical challenges, including chronic health conditions or the physical demands of pregnancy and postpartum recovery. E-bikes provide a way to stay active without overexertion, improving mental and physical health.

- Economic barriers: Women typically face higher levels of financial stress than men, and are more likely to rely on affordable transportation options like e-bikes, and will be less able to adapt to legislative changes that impact e-bikes.
- Safety concerns: These are a critical barrier to women exercising, with perceptions of safety often preventing women from exercising alone, or riding analogue bikes in spaces perceived to be unsafe. E-bikes allow women to have more control over their personal safety, and the confidence to know they can quickly escape if threatened while alone (e.g. harassed by a stranger while commuting).

### **Why e-bikes are so important to the Dirt Girls**

E-bikes have been instrumental in building and maintaining our group of strong, supportive women because they have removed barriers to participation, allowing us all to be on a level playing field.

The Dirt Girls group in turn gives women from different backgrounds and stages in life somewhere to belong, a community, a safe place to improve their mountain bike skills and to laugh, and talk about their lives and sometimes their concerns. Many members have described how important a community of strong, supportive women is to their confidence and self-esteem.



*Maintaining a connection to the Dirt Girls community was crucial for many members during COVID when social distancing was required. E-bikes ensured that we could all come together to ride, regardless of what other challenges we were facing.*

Kirsty, a long-standing member described the positive impact the Dirt Girls has made for her:

*'I love that this group has helped me foster life-long and life-changing friendships with like-minded women. We empower each other; to challenge ourselves on the trails, this has definitely helped me to build up my confidence both on and off the bike.*

*It has also given me and the other Dirt Girls a place where we can come together, exercise in nature and to talk about the things that are important to US. To share our experiences, our difficulties, break taboos, receive and give advice and generally talk about anything we want!'*

Many Dirt Girls members who ride e-bikes wanted to record in this submission how important e-bikes are in maintaining their mental health, physical health, quality of life and sense of community. Dirt Girls members in their 40s, 50s and well into their 60s, as well as others with significant health challenges or major injuries have emphasised the importance of e-bikes in being able to continue to ride, and maintain connection with the Dirt Girls community.

This is why so many of the Dirt Girls have serious concerns about the proposed legislative changes, and the consequences that would restrict e-bike access and functionality and make mountain biking less accessible and enjoyable for women.

### **Specific Concerns**

#### **1. 10 km/h speed limit on all footpaths**

The proposed blanket speed limit of 10 km/h on footpaths will negatively impact e-MTB riders, and these effects will be disproportionately experienced by women.

Most of the Dirt Girls group rides involve riders with mixed ability and fitness levels – the benefits of e-bikes mean that we do not need to separate into separate groups, and we can all ride together. The proposed speed limit would force women on e-MTBs to ride significantly slower than riders on analogue bikes on the same trails, which would make it extremely difficult to maintain a single group on Dirt Girls rides. Friends, partners and family members wouldn't be able ride together without significant challenges.

Longer rides such as those on the Brisbane Valley Rail Trail (BVRT), where average speeds are typically 18-25 km/h, would become impractical for mixed groups. As a consequence, women on e-bikes would be more likely to miss out on these rides, and miss the camaraderie and experiences unique to the BVRT.

The 10 km/h speed limit would also pose a safety risk for e-MTB riders on many local trails. Most trail features such as jumps, rock-gardens, chutes and drops need a degree of speed and momentum to safely navigate. Female e-MTB riders would be put in the

position where they are forced to choose between safely riding a feature and complying with the proposed legislation.

The blanket speed limit fails to consider the varying conditions of trails and pathways, uses and users. While a lower speed limit may be appropriate in high-traffic pedestrian areas, it is unnecessary and potentially dangerous on trails with clear visibility and negligible pedestrian traffic.

## 2. Compliance with EN 15194:2017+A1 Standards

The proposed requirement to comply with the very specific EN 15194:2017+A1 standard will be extremely difficult for many e-bike owners to comply with. This standard only came into effect in Europe in August 2025, and most e-bikes in Queensland will automatically be non-compliant on 1 July 2026 when the legislation is proposed to come into effect.

It does not appear that any e-MTBs owned or used by Dirt Girls members are compliant with the proposed standard, including e-MTBs purchased as recently as March 2026.



*E-bikes allow women of different abilities and fitness levels to ride together on longer rides, such as the BVRT.*

As there is no clear pathway to compliance for currently legal e-bikes, it is likely that the proposed change will render most currently legal e-bikes illegal on 1 July, leaving women who currently ride an e-bike with no option, other than purchasing a new e-bike (or analogue bike), to achieve compliance.

For women, particularly those facing financial challenges – for example single mothers - the financial burden of saving up to buy a new bike (e-MTB or analogue) to meet the new standard would be prohibitive. E-MTBs are a significant investment, and many members of the Dirt Girls only have access to an e-bike, so wouldn't be able to switch to riding an analogue MTB if they are unable to ride their e-bike.

Many women also use e-bikes (in particular cargo e-bikes) as a cost-effective and sustainable transport option, particularly for transporting children to and from school. If e-bikes are no longer a feasible option for these tasks, women's options for school transport will be significantly constrained, and will likely result in more car journeys, and increased congestion and safety risks near schools.

The lack of a clear, achievable pathway to compliance for existing e-bikes risks discriminating against women riders who rely on their bikes for mobility, recreation, family transport and community participation.

### 3. Licensing requirements for e-bike riders

The proposed requirement for e-bike riders to hold a Queensland learner licence introduces barriers that will disproportionately affect women. Even though Queensland has a higher population of women than men, more driver's licences are held by men than by women.

For many women, e-bikes provide an affordable, accessible alternative to driving. Licensing requirements would impose unnecessary costs, including renewal fees every 3-5 years, which may prevent women with limited financial resources from using e-bikes.

Additionally, some women may be unable to obtain a driver's licence due to medical conditions, even though they are capable of safely operating an e-MTB. For these women, e-MTBs are a crucial means of maintaining independence, mobility, and wellbeing. Requiring a licence would unfairly exclude them, undermining the inclusive nature of e-bike use.

Licensing requirements would also affect tourists, international students, and interstate visitors who may not hold a Queensland licence. For women in these groups, e-bikes provide a practical way to explore the state, participate in group rides, and acclimatise to Queensland's climate. Restricting access to e-bikes would reduce opportunities for these individuals to engage in outdoor recreation and contribute to the local economy.

### **Recommendations**

To ensure the proposed legislation is inclusive and equitable, the North Brisbane Dirt Girls recommend the following:

- Remove the blanket 10 km/h speed limit for e-bikes to all footpaths, and instead allow local councils or other relevant land managers to apply evidence-based speed limits on a case-by-case basis. This would allow proactive management of known problem areas while limiting the unintended impacts on law-abiding e-bike and analogue bike riders.
- Identify a clear and workable e-bike definition that doesn't render currently compliant e-bikes as illegal. The definition should include the established Australian and EN15194 standards and identify a clear, no-cost, achievable pathway to compliance for owners of safe, legal e-bikes that are limited in accordance with the current legislation.
- Remove the licence requirement and maintain the current regulatory framework for legally compliant pedal-assist e-bikes. Invest in public awareness campaigns and educational initiatives to promote safe and responsible e-bike use.
- Promote accessibility and inclusivity by ensuring the proposed legislation does not disproportionately impact women, older riders, individuals with health conditions, or those from disadvantaged backgrounds. Consultation with these groups is essential to ensure their needs and perspectives are considered in the final legislation.

### **Conclusion**

The North Brisbane Dirt Girls supports the intent of the proposed legislative changes to improve safety and promote responsible e-bike use in Queensland. However, the current provisions in the TOLA Bill risk creating significant unintended consequences for e-bike riders and disproportionate impacts on female e-bike riders.

By addressing the matters raised above, the legislation can better achieve its objectives without penalising law-abiding e-bike riders and further marginalising female riders.

The Dirt Girls community is so important to us all. Please consider our perspectives, experiences and recommendations to ensure a fairer and more inclusive outcome for all riders.