

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

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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

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Overview

The North Brisbane Mountain Bike Club (NBMBC or the club) was founded in 1995 and organises social rides and events around Brisbane and beyond for riders of all levels.

The club supports 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 unintended consequences on the club and broader mountain bike community in Queensland.

Introduction

NBMBC, colloquially known as the North Brisbane Dirt Dogs, is a non-profit community club which organises weekly club rides for our 149 members in greater Brisbane and south-east Queensland. The club has a women's group known as the North Brisbane Dirt Girls, and is family-friendly, welcoming under-16s supervised by a parent or guardian.

The club also subsidises professional mountain bike skills classes and other useful qualifications such as first aid training for members, and supports riders competing in race events.

The club's subsidiary Northside Trail Care Alliance actively works with land managers (predominantly Queensland Parks and Wildlife Service - QPWS) to develop and maintain sustainable mountain bike and shared use trails in our local area for the enjoyment of all.

Context

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.

Mountain biking is a lot of fun, but it can be hard work for people new to the sport, or those who struggle to maintain their fitness or ride in the Queensland heat. As such, a significant proportion of regular club ride attendees own and ride a legally compliant pedal-assist e-MTB limited to 250 watts and motor assistance to 25 km/h. E-motos are not permitted to be ridden at club events, and we do not support their use in public spaces, other than in a regulated manner on roads if the devices are compliant.

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 on club rides. The proportion of e-MTB riders on regular weekly club rides is typically a quarter to a third of all riders. Almost all rides are mixed, with E-MTB and analogue bike riders riding together in the same groups and on the same trails.



The North Brisbane Mountain Bike Club is a diverse group of people drawn together by a love of mountain biking and the great outdoors.

Some club members use both e-bikes and analogue bikes, depending on the circumstances, and others only have e-bikes. Many members have transitioned to using e-bikes following injury or illness, or as a way to ride longer distances, or ride more often.

E-bikes are also popular with parents who often have to juggle child-related commitments, and have limited time to ride and/or find it difficult to maintain the level of fitness required to enjoy mountain biking – these riders are often (but not always) women.

For many club members, having an e-bike is the difference between riding or not.

Setting

NBMBC predominantly organises club rides on the trail networks at Bunyaville Conservation Park (Bunya) and Samford Conservation Park (Ironbark), but also places further afield such as Daisy Hill, Gap Creek, Mt Cotton, Toowoomba and Hidden Vale Adventure Park. Some events are longer distance but less technical ‘adventure’ rides, for example on the Brisbane Valley Rail Trail (BVRT) or the Samford pony trails.

Except for Hidden Vale which is on private property, all these trail networks are on land managed by local councils or QPWS. This means they are subject to the Queensland road rules (Transport Operations (Road Use Management—Road Rules) Regulation 2009), and as such, will be impacted by the proposed changes enacted by the *Transport and Other Legislation (Managing E-mobility Use and Protecting Our Communities) Amendment Bill 2026*.

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

Club members and committee members have reviewed the Inquiry into e-mobility safety and use in Queensland report, published in February 2026, and the *Transport and Other Legislation (Managing E-mobility Use and Protecting Our Communities) Amendment Bill 2026* (TOLA Bill) tabled on 25 March 2026 which proposes to legislate the recommendations from the inquiry.

While the club strongly supports many of the inquiry’s recommendations, there remain significant concerns for some aspects, and the potential for severe negative impacts on law abiding mountain bikers.

Recommendation 14: 10 km/h speed limits on all footpaths

Current context: e-bikes are subject to posted speed limits, but motor assist cuts out at 25 km/h.

The 10 km/h speed limit for e-MTBs on footpaths proposed in clause 54 of the TOLA Bill is understood to apply to all footpaths, shared paths and multi-user trails that are not a dedicated/separated bikeway or road. It is not clear how this would apply to trails in conservation parks, but for the purposes of this submission, NBMBC assumes that mountain-bike only trails (as classed by QPWS) would not be subject to the 10 km/h limit.

A significant number of trails used by NBMBC on club rides would be subject to the 10 km/h limit for e-bikes, which would create significant issues for future club events.

For example, a recent 17.5 km club ride at Ironbark involved riding 12.7 km on shared trails and 4.8 km on mountain bike-only trails.

Under the proposed legislation, the club would have to separate the ride into two groups, not by skill or competency, but by the type of bike being ridden. The e-MTB group would be restricted to 10 km/h on empty trails with good visibility, and even on the bikeway to the local coffee shop for a post-ride chat. Friends, partners and family members wouldn't be able ride together without significant challenges.



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

Longer 'adventure' rides such as on the BVRT would be unfeasible in a mixed group of analogue and e-bikes. Typical speeds for many cyclists on the BVRT are 18-25 km/h, so e-bikes would be restricted to half the speed of analogue bikes, and only able to cover half the distance in the same time.

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 require a degree of speed and momentum to safely navigate. E-MTB riders would be put in the position where they need to choose between safely riding a feature or complying with the proposed legislation.

This proposed restriction will create logistical challenges and diminish the overall riding experience for e-bike and analogue bike riders alike. It will penalise law-abiding e-bike users and discourage active transport and recreation, contrary to broader government goals of promoting health and fitness.

Recommendation 19 e-bikes to comply with EN 15194:2017+A1

Current context: no clear requirement to comply with specific standards, only limits for continuous power and pedalling assistance.

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 the vast majority of 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 club members are compliant with the proposed standard, including e-MTBs purchased as recently as March 2026.

The TOLA Bill's explanatory note states that the legislation will '*allow retailers and existing owners time to obtain compliance labels or make necessary modifications so that devices meet the updated EPAC definition.*' However, it's not clear what these modifications would be, or if they are even feasible on older (but still legal) e-bikes. Discussions between NBMBC members and e-bike retailers has indicated that there has been limited consultation with retailers and mechanics on the feasibility of retrospective compliance with EN 15194:2017+A1.

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.

Recommendation 13(a) e-bikes only to be ridden by individuals 16 years and over

Current context: there is no minimum age to ride an e-bike.

The ban on under 16s using (currently) legal e-bikes would create unnecessary barriers to younger riders taking up the sport and getting outside to have fun.

Imposing a blanket age limit doesn't account for the advantages of pedal-assist e-MTBs for younger riders who may struggle with the physical demands of mountain biking in Queensland's terrain and climate.

The ban will prevent children from riding an e-bikes with an adult, for example when a parent and child ride to or on mountain bike trails, and the child rides an e-bike to assist with fatigue from distance or steep hills. This is common within the mountain biking community when even easy trails involve a significant climb.

Studies have also shown that there are measurable benefits of mountain biking on adolescent mental health ([Zarbiv et al, 2025](#)), notably increasing resilience and self-esteem. This is needed now more than ever, given the mental health crisis faced by children and young people.

Integrating road and path safety education into the school curriculum would ensure young riders are equipped with the skills and knowledge to use e-bikes responsibly. This would also align with broader objectives to encourage active transport and reduce reliance on cars for school-related travel.

Recommendation 13(b) e-bike riders to hold at least a Queensland learner licence

Current context: no licence is required to ride an e-bike.

The proposed licensing requirement for e-bike riders would impose financial and administrative burdens, especially given the current cost of living pressures. Requiring a Queensland learner licence every 3-5 years pose a significant barrier to e-bike use, despite these vehicles being low-risk and accessible. This measure would disproportionately affect lower socio-economic groups, young adults, and individuals with financial or medical barriers, limiting their access to an affordable, sustainable mode of transport and recreation.

This would also exclude individuals unable to hold a driver's licence due to medical conditions, despite being medically approved to ride an e-bike. It would also penalise people with suspended licences for financial reasons, compounding their hardship. E-bikes provide an essential, affordable mode of transport for these groups, offering independence and mobility. Removing this option would increase isolation, reduce employment and recreational opportunities, and disproportionately impact already vulnerable populations.

Licensing requirements also fail to account for the needs of tourists and international or interstate students, who often rely on e-bikes for work and leisure while temporarily residing in Queensland. These individuals may not hold a Queensland learner licence and would face significant barriers to hiring and using e-bikes. The Queensland heat can already be a challenge for visitors unfamiliar with the climate, and pedal-assist e-bikes provide a practical, low-impact solution for navigating the region's hilly terrain and bikeways. Restricting access to e-bikes would diminish their ability to travel efficiently for work, participate in recreational activities, and spend money in the Queensland economy.

Requiring e-bike riders to hold a Queensland learner licence would disproportionately affect vulnerable groups, and would undermine the accessibility and affordability of e-bikes as a sustainable transportation and recreational option. A more balanced approach would be to focus on education and enforcement of existing regulations rather than imposing additional barriers that exclude a significant portion of the population.

E-motos on mountain bike trails

NBMBC also has significant concerns regarding the increase of illegal e-motos on mountain bike trails and other shared pathways.

Due to their substantially higher power and speeds, e-motos are extremely dangerous to others when used on all mountain bike trails (shared pathways or otherwise).

E-motos also cause increased damage compared to e-MTBs to the trails maintained by volunteers in the Northside Trail Care Alliance. This means there are fewer volunteer-hours and other resources available to maintain and improve the mountain bike trails at Bunya and Ironbark.

NBMBC strongly supports the restriction of e-motos to private land, and where appropriately licenced, Queensland's roads. However, given that these devices are illegal under current legislation, it's not clear how much of the additionally proposed legislation will meaningfully impact the use of e-motos on Queensland's bikeways and mountain bike trails. NBMBC doesn't expect that e-moto riders who are breaking the existing laws controlling the use of e-bikes will change their behaviour to comply with the proposed legislation. Instead, the many people who use and rely on currently legal e-bikes will be negatively impacted by the broad-reaching consequences of the proposed laws, while those who currently ride illegally will continue to do so.

Enforcement of the existing legislation for e-motos will improve safety outcomes without the significant negative impacts on e-bike riders.

Other impacts of proposed legislation on club members and other riders

Many Queenslanders are facing critical cost of living pressures, especially with recent global events and the impacts on petrol and diesel. An e-bike is a significant capital investment, but doesn't cost much to ride or operate. Many club members who only own an e-MTB would have to pause their riding while they save up to buy an analogue MTB in order to fully participate in club events.

Many club members also use their e-bikes to commute to work along shared pathways such as the Kedron Brook Bikeway. The 10 km/h speed limit would significantly extend the commute time, forcing many riders to either run the risk of riding on the road, or commute in their cars, increasing congestion. For context, in the 12 months to 30 November 2025, a total of 1,332 people died on Australian roads, of whom 207 were pedestrians and 43 were cyclists ([Australian Automobile Association, 2025](#)).

The explanatory note for the TOLA Bill states that '*lower speeds on footpaths and shared paths may deter riders from using these environments in areas with high pedestrian activity or where higher-quality active transport infrastructure is available, encouraging riders to select routes that better support higher speeds.*' Given that many key parts of Queensland's Principal Cycle Network are classed as shared pathways,

including significant parts of the Kedron Brook Bikeway, Cabbage Tree Creek Bikeway, Enoggera Creek Bikeway, Jim Soorley Bikeway, and others, this statement, and the legislative changes it supports are poorly considered.

NBMBC is based in the Hills district of Brisbane/Moreton Bay, which is aptly named. Some club members have children under 16 who use an e-MTB to travel to and from school, but who would not be able to do so on an analogue bike due to steep hills and Queensland heat. A ban on under-16s riding e-MTBs will drive more people to use cars for school drop-off and pick-up, causing additional traffic issues and increasing safety risks for children in school zones. This could also cause a cascading effect, particularly for parents of high-schoolers, who would be more reliant on parents for school drop off/pick up, and limit parents' flexibility to work full time.

There are many Queensland-owned businesses that have transitioned their business models to support the growth in e-bikes. For example, e-bike hire companies for use on the BVRT, or mountain bike shops with a significant proportion of sales from e-bikes. These businesses would most likely have to close because of the proposed short-sighted changes.



NBMBC member riding an e-MTB in the Ipswich round of the Rocky Trail mountain bike race series, 2024.

E-MTB racing is a rapidly growing sport that relies on accessibility to attract diverse participants and develop talent. The proposed changes will deter new riders, limit training opportunities, and create barriers for aspiring athletes. E-MTBs are also increasingly used by elite and Olympic athletes (including those preparing for Brisbane 2032) as part of their training regimes. The proposed laws risk undermining

Queensland's ability to nurture competitive athletes, reducing its representation and success in national and international mountain biking events.

E-MTBs provide an affordable, accessible mode of transport and recreation, enabling mobility and independence for a wide range of people, including women, older people and those with chronic health issues, people who are time poor, people from lower socio-economic backgrounds, and people who live in areas poorly served by public transport.

The legislative changes described above will have limited impact on the safety and damage risks posed by e-motos which are illegal to use on trails, paths and bikeways under current legislation. The broad approach to be enacted by the proposed legislation will restrict the functionality and access to e-bikes for Queenslanders, and will significantly reduce their ability to commute, stay active, engage socially and enjoy our beautiful state.

Recommended changes to the TOLA Bill

The club proposes the following changes to the TOLA Bill:

1. 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.
2. 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.
3. Remove the licence requirement for legally compliant pedal-assist e-bikes, and instead undertake a public awareness campaign on footpath safety and the rights and obligations of all path users. This would ensure continued access for people who significantly benefit from being able to use an e-bike while improving understanding of safety issues.
4. Remove the age threshold of 16 years for legally compliant pedal-assist e-bikes, and undertake further research and consultation on developing an evidence-based bike size to power ratio threshold that will support use of active transport in school-aged children. This could be supported by the state-wide inclusion of road and path safety in the school curriculum and stronger support for active transport for school-related travel. This would improve the uptake of active transport in young people while improving their understanding of road and path safety.

Concluding statements

The North Brisbane Mountain Bike Club 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 the broader community. By addressing the matters raised above, the legislation can better achieve its objectives without penalising law-abiding e-bike riders. We urge the government to consider these recommendations for a fairer and more inclusive outcome.