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

Submission No: 1932
Submission By: Zero Emissions Noosa Inc.
Publication: Making the submission and your name public

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Zero Emissions Noosa Inc. (ZEN): Submission on E Mobility in Response to Qld. Government Recommendations

March 2026

ZEN Inc. has grave concerns about three recommendations included in the 28 recommendations that the Queensland Government has accepted from the EMobility Parliamentary Inquiry.

Recommendations 11, Rec 13, and Rec 14 will impose disproportionate, inappropriate, harmful, and unworkable restrictions on law-abiding e-mobility users.

Redefining the usage of European Standard EN15194 for E bikes, i.e. what is na E bike, is needed under the legislation

We call on the Government to revise these provisions before implementing legislation.

Background

Zero Emissions Noosa Inc. (ZEN) acknowledges that the Queensland Government's acceptance of the Parliamentary Inquiry into e-mobility safety includes many welcome and overdue reforms.

Measures addressing battery safety, import controls on non-compliant devices, infrastructure investment, and the strict enforcement of existing laws against illegal high-powered devices are sensible, evidence-based, and long overdue.

ZEN supports these recommendations but the Government's acceptance of all 28 recommendations without qualification means that there are three recommendations — Recommendations 11, 13, and 14 which are not fit for purpose and will now proceed to legislation, causing long term problems that will need further changes of legislation in the future. By adopting some amendments to much ensure more fit for purpose legislation, as outlined below, will prevent the need for future legislative changes and make this legislation more workable for those tasked with implementing it.

Zero Emissions Noosa Inc. (ZEN)'s submits that these three recommendations were not supported by evidence, were not shaped by the community consultation process, and will cause serious, foreseeable harm to legal e-mobility users across Queensland, including on the Sunshine Coast.

This submission sets out ZEN Inc's concerns and our calls for legislative review and revision.

To provide context for this submission, outlined below are background points about cycling in our local community/region.

1. Legal e-mobility users in the Noosa electorate community want a safe cycling environment. As part of our transport related project work, we know that more people will use legal e-bikes if they feel safe.

2. More separated bicycle and legal e bike infrastructure makes cycling and pedestrians safer – a less expensive alternative to road infrastructure upgrades.
3. More legal e bike riders will help to reduce traffic congestion and reduce the need for very expensive infrastructure upgrades for cars.
4. During the current fuel crisis and rising cost-of-living, e-bikes offer an affordable, zero-emission alternative. Queensland's proposed 10km/h speed limit on shared paths—slower than a brisk jog—renders e-bikes useless for commuting. At a time when more and more people are looking for an alternative to petrol- and diesel-powered transport as part of cost of living relief, legal e bikes provide this possibility. Encouraging legal e bicycling is one way to provide cost of living relief and assist future fuel security with less car drivers.
5. The Noosa electorate has been a leader since 2106 in safe e bike and bicycle use, by running community e bike rides; having seven annual EV Expos with an emphasis on safe e bike trials and use; having Queensland's only E Bike Library, in partnership with a local e bike business, and funded by a State Government grant, to encourage people to get out of cars and onto e bikes.
6. The Noosa e-Bike Library model has already solved the safety "problem" through responsible management. By ensuring only adults can borrow bikes and providing mandatory education on legality and safety, the Library demonstrates that community-led standards are more effective than state-mandated barriers. The government should be scaling this model, not stifling it.
7. By making e-bikes harder to access through licensing and age bans (16+), the law will inevitably push younger residents and non-drivers toward less safe or less efficient modes of transport. This results in more "parent-taxis" on the road, increased traffic around Sunshine Coast schools, and a reduction in the physical activity levels of the community. This actively sabotages the Zero Emissions Noosa goals and the Noosa and Sunshine Coast Council's Active Transport Plan, which aim to reduce car dependency.
8. The Sunshine Coast and Noosa are global tourism hubs that rely on "e-Noosa" principles of sustainable travel. Requiring interstate or international visitors to navigate complex licensing and medical fitness hurdles to rent a bike will decimate the local e-mobility tourism industry and force more visitors back into rental cars, worsening regional congestion.
9. Safe use of e bikes and e bike tourism and the growth of businesses that supply them, will be increasingly important in the lead up to the 2032 Olympics where there will be many people arriving who are used to a safe e biking experience realistic regulation. These recommendations put these current businesses in jeopardy, when Queensland should be ramping up these businesses to service the increase demand in the lead up to the 2032 Olympics, rather than putting these businesses out of businesses.

The current recommendations 11, 13, and 14 discourage all of the above and so need to be changed to provide a safe and legal e biking experience for riders and pedestrians alike.

ZEN calls on the Queensland Government to revise the three recommendations outlined below and use the European definition of e bikes, before continuing with the legislative process.

Recommendations Needing Review

1. Classifying All E-Mobility Devices as Motor Vehicles

Recommendation 11 proposes that all e-mobility devices with an electrical power source be defined as 'motor vehicles'.

Applied without explicit, unambiguous protections for compliant devices, this single recommendation risks retrospectively criminalising the use of legally purchased, compliant e-bikes and e-scooters that are already lawful under Queensland and national standards.

The proposed laws fail to distinguish between legal pedal-assist e-bikes (which require active pedalling and cut out at 25km/h) and illegal high-powered motorbikes disguised as e-bikes. By imposing licensing and medical fitness requirements on all users, the government is "punishing the victim"—the law-abiding commuter—rather than focusing enforcement on the small minority using non-compliant, high-speed vehicles.

The root problem is one of enforcement failure, not classification. Compliant e-bikes — limited to 250W and 25 km/h — already exist in a clear legal category. The devices causing the safety concerns that prompted this inquiry are high-powered illegal electric motorbikes that already fall outside this category and should simply be enforced against as motorcycles under existing law. Reclassifying all devices as motor vehicles does nothing to address this without the accompanying infrastructure of registration, compliance standards, and roadworthiness inspection — none of which the recommendation proposes. Refer to: What is an E Bike in Appendix A.

ZEN Inc. calls on the Government to ensure any implementing legislation contains explicit, unambiguous protections for riders of compliant, legal e-bikes and PMDs, and that Recommendation 11 does not extend the motor vehicle classification to devices that already meet national compliance standards.

2. Licensing Requirements for Legal E-Mobility Riders

Recommendation 13 proposes that riders of compliant e-bikes and PMDs be required to hold at least a Queensland Class C learner licence.

ZEN Inc. strongly opposes this recommendation. It was not supported by evidence at the inquiry, was opposed by the majority of stakeholders who appeared before the committee and will have severe unintended consequences for some of the most vulnerable members of our community.

The requirement to be "medically fit to hold a driver's license" is a discriminatory hurdle. For many in the Sunshine Coast and Noosa regions, e-bikes are a lifeline for those who cannot drive due to age, disability, or medical conditions. These laws effectively "lock out" the very people who rely on e-mobility for independence and essential travel.

Linking e-bike use to a Class C Driver's License is logically flawed. A car license tests one's ability to operate a 2-tonne motor vehicle in traffic; it does not equip a person with the balance, path etiquette, or safety skills required for a bicycle. This "motonormative" approach treats bikes as inferior cars rather than a distinct, sustainable transport solution.

Those who will be most harmed include:

- **Elderly residents** who have voluntarily surrendered their driver's licence — the very people who most benefit from e-mobility's accessibility features on hilly coastal terrain.
- **People with disabilities** who rely on compliant e-bikes and PMDs as an accessible alternative to conventional cycling or car ownership.
- **International and interstate tourists** — a crucial economic sector for the Sunshine Coast — who could not legally hire or ride an e-bike in the region, including during the 2032 Brisbane Olympics.
- **Low-income earners, migrant workers, and international students** who use e-mobility as their primary transport and who do not hold, or have not yet obtained, a Queensland driver's licence.

Evidence from comparable jurisdictions is instructive. London's shared e-scooter scheme requires a driving licence; Brisbane's does not. Despite London's significantly superior separated cycling infrastructure, Brisbane's e-scooters are used between twice and nearly eight times more often than London's. Licensing requirements directly suppress uptake, and reduced uptake means more cars, not fewer.

ZEN Inc. calls on the Government to reject the licensing component of Recommendation 13 unless and until a full Regulatory Impact Assessment demonstrates a clear safety case and assesses the impacts on disabled people, elderly residents, tourists, and other disadvantaged groups.

The age threshold component of Recommendation 13 should be set at between 12 and 14 years — consistent with the evidence — not 16.

3. 10 km/h Speed Limit on All Footpaths

Recommendation 14 proposes a blanket 10 km/h speed limit on all footpaths for all e-mobility devices. This recommendation appears to have been made without any consultation with the Department of Transport and Main Roads (TMR) on minimum safe cycling speeds — a concern TMR itself flagged in response to public submissions.

Walking pace is approximately 5 km/h. A 10 km/h limit renders any meaningful e-bike journey on a footpath impossible.

For Sunshine Coast riders, this is not a theoretical concern. The route between Aura and Caloundra — a 9 km journey regularly made on the footpath behind Bunnings and along the aerodrome — would either double in time to over an hour, or force riders onto Nicklin Way and Caloundra Road: roads with high traffic volumes, high speed limits, and minimal cycling infrastructure.

There is a further structural problem. Queensland's network of shared paths, riverside paths, foreshore paths, and long-distance rail trails — including the Brisbane Valley Rail Trail — may constitute 'footpaths' under existing legislation.

A 10 km/h speed limit applied across this network would effectively ban legal e-bike commuting and tourism riding across the entire state. This cannot have been the committee's intent, but it may be the unintended consequence.

The practical effect is not safer footpaths — it is more cars on congested roads as riders abandon e-bikes for vehicles, increasing the possibility of more accidents and/or the need for expensive upgrades to road infrastructure This is the opposite of the Government's stated transport and congestion-reduction objectives.

ZEN Inc. calls on the Government to reject Recommendation 14, undertake proper consultation with TMR and road safety experts, and reserve any decision on footpath speed limits until the impact of other endorsed measures — particularly enforcement of illegal devices — has been properly evaluated.

4. Use of European Standard EN15194, a clear and workable e-bike and e-trike definition and a legal mechanism to enable exemptions for compliance requirements

a. the definition of what is legal e-bike or EPAC and

Under Clause 63, Section 353B of TORUM an EPAC (Electric Pedal Assist Cycle) is one that explicitly complies with EN15194:2017+A1 which is the current revision of the EN15194 standard.

The bikes that are currently owned by people are EN15194 or EN15194:2017 compliant. Because they’re using the explicit one revision only, virtually all of the of the EPACs (as the amendments generally refer to compliant e-bike), in QLD in our garages and being used everyday by Queenslanders' to get around, will become illegal if this is left un-edited.

The legislation needs to be edited to state EN15194 so that it's future proof and backward compatible as the fundamentals of the standard have never changed.

b. clear and workable e-bike and e-trike definition

EN15194 in its generic definition works well for 2-wheeled electric bicycles, encompassing the boundaries of performance for the electric system as well as best practice for the design of the frame and associated componentry. Due to the geometric metrics required to meet compliance, electric tricycles are unable to achieve compliance.

It is recommended that a subset of the EN15194 key electric criteria be adopted for electric tricycles, with compliance being achieved if the trike:

- Has a tamper-proof maximum continuous rated power of 250W;
- Has a tamper-proof maximum pedal assisted speed of 25 km/h;
- Has a tamper-proof maximum assistance walk-assist feature of 6 km/h.

Adaptive e-bikes and e-trikes require modification to enable them to be used by a broad spread of riders of all ages and all abilities. To meet the needs of these less-able riders, below are some suggestions to mitigate 2 major concerns we have of a strict adherence to EN15194.

ZEN Inc. submits that electric tricycles and adaptive tricycles that are unable to achieve full compliance against EN15194 should not be considered a 'prohibited bike' if the unit meets these criteria. An urgent exemption for 3-wheeled bicycles that does not require an excessively onerous documentation process to obtain a permit is needed. For older riders, those living with disabilities or caring for someone with complex needs, if they have already secured funding or are considered eligible for funding through one of the Federal or State agencies. We submit that this "evidence" is considered sufficient to receive a permit without additional overhead expenses.

c. **Enabling a legal mechanism to enable exemptions for compliance requirements**

We seek a framework to enable trike riders, with the documented support of a Medical Practitioner or Allied Health Prescriber, to secure exemptions for one or more of the EN15194 key electric criteria.

The justification for this would be based on age, physicality, geographic terrain conditions and/or health. Where the risk to the individual is greater without the exemption, a qualified professional should be able to recommend exemption that is legally recognised by the judiciary and insurance bodies.

Specifically for children under 16 with a disability, their NDIS or NSIIQ funding approval for Assistive Technology (AT) that is prescribed by an Allied Health Professional should not have to seek additional permits to recognise their use of the AT is legal both for the judiciary and for insurance cover.

This applies to people funded through the National Disability Insurance Scheme (NDIS), older people with Home Care Packages, Veterans and people who have sustained injuries following a traffic accident through the National Injury Insurance Scheme, Queensland (NSIIQ). Over 99% of these solutions involve the use of adapted pedal assist to provide gentle power assistance to people with compromised mobility. If these laws are passed, most of the people requiring assistance will lose their ability to choose movement over sitting in a wheelchair or mobility scooter, thus potentially increasing the burden on the healthcare system

ZEN Inc. Recommendations about E Mobility

The safety concerns that prompted this inquiry are real. Illegal, high-powered electric motorbikes do pose a risk to pedestrians, path users, and other road users. The answer is enforcement, not punishing the many for the conduct of the few. ZEN Inc. supports the following measures as the appropriate response:

- Strict and properly resourced enforcement of existing laws against illegal high-powered devices, treating them as motorcycles as current law already requires.
- Tighter import and point-of-sale controls to prevent non-compliant devices entering the Queensland market (Recommendations 9 and 10 — supported).
- Significant investment in separated e-mobility infrastructure — the single most effective safety intervention identified by academic research, and a pressing need across the Sunshine Coast given multiple major transport projects currently underway e.g. Aura in Caloundra South; Melbourne St., South Brisbane.
- Technology-based speed management in high-pedestrian zones, using geofencing by shared scheme operators (Recommendation 18 — supported), rather than blanket legislative limits.
- Statewide rollout of evidence-based rider education programs, including locally developed programs such as the Sunshine Coast's Scoot2School e-scooter education initiative.
- Mandatory road safety education targeting motorists — who are responsible for the overwhelming majority of serious crashes involving e-mobility riders.

ZEN's Call to Action for the Queensland Government

Zero Emissions Noosa Inc. calls on the Queensland Government to:

1. Reject or substantially revise Recommendation 13 (licensing of legal e-mobility riders) and ensure any age threshold is set between 12 and 14, not 16.
2. Reject Recommendation 14 (10 km/h blanket footpath speed limit) and consult TMR and road safety experts before introducing any footpath speed restriction.
3. Ensure any legislation arising from Recommendation 11 contains explicit, unambiguous protections for riders of compliant, legal e-bikes and PMDs.
4. Direct enforcement resources at illegal high-powered motorbikes, not law-abiding e-mobility users.
5. Revise the three recommendations that the evidence, the experts, and the community consistently identified in the community consultation process, demonstrating that consultation was genuine and was taken into account in developing the legislation.

E-mobility, when used responsibly on compliant devices, is a safe, affordable, and sustainable transport option for Sunshine Coast residents — particularly those who face barriers to car ownership or conventional cycling. The vast majority of riders are law-abiding, contributing members of the community. They deserve policy that supports, not punishes, their choices.

For further information, contact:

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What is an E-Bike? **Appendix A**

What is an E-Bike? - an E-bike is a Pedelec, the motor only provides assistance when pedalling*:
- a 2 wheeled machine controlled by a throttle is a **Motorbike**, not an E-bike
-a 3 or 4 wheeled machine with a maximum speed of 6km/hr is a mobility device

Why an E-bike can go faster than 25km/hr (and still be legal)
First: the key rule, the critical distinction
A legal Pedelec does **not** have a speed limit. It has a **motor assist speed limit of 25km/hr.**

The law says: **The motor must stop helping at 25km/hr. It cuts out at 25km/hr.** It does **not** say: **The bicycle cannot go faster than 25km/hr.** This is the biggest misunderstanding.

The 3 Sources of Power on an E-bike
An E-bike can move because of 3 completely separate sources of power:

1) Motor power (limited) This is the only regulated part
- Maximum Continuous Rating 250W
- Assistance cuts out at 25km/hr
- Only works while pedalling.

This is **assistance power**, not propulsion power Think of it as: Power assistance like Power Steering.

2) Human power (unlimited) The rider is not limited. Humans can produce:
- Gentle riding -> 75-120W
- Normal riding -> 120-200W
- Fit riders -> 200-300W
- Short bursts -> much higher

An elite cyclist on a modern lightweight bicycle can maintain speeds above 50mkhr for long periods, above 60km/hr when riding in a peloton, in formation.
This power has **no legal limit** because it is human. So above 25km/hr, an E-bike is just a normal bicycle with **no motor assistance.**

3) Gravity (potential energy)
Most people forget this. When descending, gravity supplies energy. Any normal cyclist can exceed 25km/hr when descending. Tour de France cyclists descend at speeds in excess of 70km/hr without motor assistance. Once more, an E-bike behaves like a normal bike (no motor assistance) when descending faster than 25km/hr. There is no speed limitation to gravity.

The Simple Explanation
Think of an E-bike like this: Below 25km/hr: Human power + Motor + Gravity Above 25km/hr: Human power + gravity The motor simply cuts out. Nothing else changes.

A Very Useful Real World Comparison
Typical Speeds:
- Casual cyclist -> 15-20km/hr
- Normal commuter cyclist -> 20-28km/hr
- Fit road cyclist -> 30-40km/hr
- Peloton (formation) -> 50-60km/hr

An E-bike just helps more people ride in the normal commuter range and makes riding to the shops, up hills, to work etc possible for a large number of people who could not do this on an unassisted bicycle.

Why Higher Motor Power does NOT Increase Speed

Because the motor controller simply cuts the motor when the speed reaches 25km/hr Example: A rider reaches 25km/hr Motor stops assisting. Even if the motor *could* produce more power, it is electronically prevented from doing so.

More Motor Power **DOES NOT EQUAL** More Speed It only means: - easier hill climbing at less than 25km/hr - easier acceleration, especially in traffic, therefore safer - better load carrying allowing parents to ferry young children, parcel delivery.

This is particularly relevant for:
1) cargo bike riders delivering infants and young children to childcare, kindergarten and primary school - this is very common in those European countries where safe cycling infrastructure enourages active transport and discourages large 4WDs.

2) parcel and food delivery riders who use E-bikes to make a living. For these categories of E-bike cyclists, 250W continuous may not be sufficient but it does not matter if they have more powerful motors because THEY CANNOT EXCEED 25KM/ HR WITH MOTOR ASSISTANCE!
This is completely different to the E-motorbikes which do NOT have speed limiters, which are throttle activated, and which, in the hands of teenagers, have caused so much harm.

These motorbikes need to be removed from our roads and pavements or be registered, meet roadworthy requirements, and have licensed riders.

*Some legal E-bikes with 250W continuous rated motors have a throttle with a maximum speed of 6km/hr for the purpose of assistance when walking an E-bike. Owing to bicycle physics, < 15km/hr is not a safe continuous cycling speed for most people. Most Pedalec E-bikes do not have a throttle.

Why a "250W" E-bike motor can produce more than 250W & Why it Matters
The **250W rating is continuous power**, meaning:
The power that the motor can safely produce all day without overheating.
This is currently the law here and is the law in Europe. It does **NOT** mean: maximum possible power.

A simple analogy: A small car engine may be rated at 80kW but when you accelerate, the motor will produce much more than 80kW for a brief time. It will also produce more when climbing a steep hill.
Another analogy: A person can walk all day at low effort. They can briefly lift a heavy weight requiring a large increase in momentary effort. The lifting power is much higher but not sustainable. Motors behave the same way.

Why Peak Power is Necessary
If a motor, as per the Parliamentary Committee's recommendation, were limited to 250W maximum at all times, E-bikes would actually:
- be impossible to start uphill
- be unstable at low speed, especially when ridden by less confident cyclists
- be unsafe with human or other cargo
- be quite awkward to ride
- put all currently legal E-bikes off the roads and footpaths Short bursts of higher power allow smooth operation.

Typical examples where higher power is needed:
- starting from traffic lights
- starting uphill
- very steep inclines
-15-20% - of which there are numerous examples in Brisbane - pulling loaded trailer, cargo bikes - riding into the wind
- recovering from low speed (after slowing for a pedestrian on a shared path).

A Practical Example
Starting on a 10% gradient with groceries:
Rider produces: 150W Motor continuous: 250W **Total: 400W**
But this is not enough to get the E-bike and rider moving up the incline so the motor briefly produces 500W to get moving. Once moving, the power quickly drops back This is exactly like pushing a heavy trolley - starting is much harder than rolling.

2 limits remain:
- the motor stops assisting at 25km/hr
- peak power lasts only briefly -> so the motor helps overcome resistance, not create high speed.

Cargo bikes: - may weigh 150-250kg.,
- without higher power they would wobble or stall starting.
Peak Power improves:
- stability
- safety
- control - NOT speed.
250W describes how much the motor can sustain. Peak power describes how much help it can give you when needed briefly. This is normal engineering, not a loophole

The Important Safety Point
The speed limiter exists because, as everyone knows, the risk of accident and injury increases rapidly with speed. By stopping motor assist at 25km/hr, irrespective of the power of the motor, the E-bike stays in the same speed range as a normal bike ridden by a moderately fit rider. It makes cycling safer and more accessible to less strong riders for everyday transport needs. This is why a legal Pedalec E-bike is treated like a normal bicycle.

An E-bike does NOT create speed.
It reduces effort.
It is not a faster bicycle.
An E-bike is a bicycle that makes hills flatter.