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

Submission No: 1933
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Submission – Queensland e-Mobility Safety Government Response

From: Zipidi / eMobility Australia
Date: 9 April, 2026

Overview

Zipidi and eMobility Australia have made extensive submissions to this Inquiry and others nationally.

We acknowledge that the Queensland Government has identified key safety challenges and is seeking to improve outcomes. However, several proposed changes risk:

- Reducing safe e-mobility uptake
- Pushing users back into cars
- Entrenching outdated definitions; and
- Failing to address the core issue of verifiable compliance

This submission focuses on key issues requiring urgent reconsideration and builds on our previous submissions.

1. Licensing: Right Objective, Wrong Mechanism

The proposal to require a **driver's licence (for cars or motorcycles)** to operate e-mobility devices is not supported.

Key issue

This approach:

- incorrectly links e-mobility to the car licensing system
- excludes younger riders and non-drivers
- creates unnecessary barriers to safe, low-speed transport

Our position

We support **mandatory rider competence**, but not via car licensing.

Recommended approach

Introduce a **dedicated e-mobility permit**, which:

- is available from a defined minimum age (recommended: **12+**, noting some European countries allow this from age 10)
- includes digital education, hazard awareness and basic testing
- applies to all riders without a driver's licence
- Does not require driving hours in cars

This delivers safety outcomes **without making car access or ownership the gateway to mobility**.

2. Minimum Age of 16: Unintended Transport Consequences

The proposed minimum age of 16 will:

- exclude many current **legal e-bike riders**
- remove a safe, low-speed transport option
- force mode shift back to car dependency (as passengers or future drivers)

Our position

Age settings should:

- reflect risk (speed, environment, device type)
- align with international norms
- support safe early adoption of mobility independence

Recommended approach

- Align minimum age with **e-mobility permit eligibility (≈12+)**
- Allow these younger users on compliant, low-speed devices under clear rules

3. Maximum Speed of 10 km/h on Footpaths/Shared Paths

The proposed reduction to **10 km/h on footpaths/shared paths** is not supported.

Key issue

- 10 km/h is **below the stable riding speed** for many devices
- It is **inconsistent with bicycles**, which are permitted to travel faster
- It creates **unsafe interactions** (speed variance, instability, overtaking conflicts)

Our position

Rules must be:

- consistent across similar vehicle types
- practical to follow
- enforceable

Recommended approach

- Maintain the current **12.5 km/h limit**, or
- Align with **bicycle behaviour and speed expectations**

Importantly:
These settings should apply to **legal, compliant e-mobility devices** — not illegal high-powered motorbikes, which require separate enforcement.

4. Device Definitions: Moving Beyond EN15194 Alone

The continued reliance on **EN15194 (pedelec standard)** as the primary regulatory anchor is insufficient to support the full spectrum of modern e-mobility.

EN15194 remains appropriate for pedal-assist bicycles, but it does not cover:

- throttle-based devices
- Higher-powered devices, still limited to 25 kph and meeting safety and engineering standards
- seated and cargo formats
- emerging low-speed urban mobility solutions

A broader, structured framework is required.

Recommended Approach: Three-Tier e-Mobility System

Queensland should adopt a **clear, enforceable three-tier classification model** aligned with international practice and real-world use cases.

Tier 1 – Pedalecs (EN15194)

- Pedal-assist bicycles compliant with **EN15194**
- Maximum assisted speed: **25 km/h**
- No registration required
- Access to existing bicycle infrastructure

Tier 2 – Personal Mobility Devices (≤25 km/h)

- E-scooters, throttle e-bikes, cargo devices and other PMDs
- Maximum speed: **25 km/h**
- Pedals optional
- No registration required
- Suitable for paths, local streets, and urban mobility use cases

Tier 3 – Higher-Speed e-Mobility (≤45–50 km/h)

- Higher capability e-mobility devices designed for longer-distance or faster travel
- Maximum speed: **45–50 km/h**
- Requires:
    - registration
    - insurance
    - defined road access rules

Beyond Tier 3

Any vehicle outside these tiers:

- is effectively a **motor vehicle or motorcycle**
- must comply with existing motor vehicle standards, registration, and licensing requirements

Mandatory Certification and Verification (All Tiers)

A critical requirement across **all tiers** is that:

> **All vehicles and their batteries must have verified certification to applicable engineering and safety standards.**

This includes, but is not limited to:

- electrical safety standards (EN, IEC, UL or equivalent)
- lithium-ion battery safety standards
- whole-of-device compliance

Key principle

Certification must be:

- **verified, not self-declared**
- **traceable to the specific product and model (and ideally, serial level)**
- **accessible for enforcement and compliance purposes**

This is essential to address:

- unsafe imports
- counterfeit or misleading labels
- battery fire risks
- enforcement uncertainty

Why This Matters

Without verified certification:

- Compliant products are indistinguishable from unsafe ones
- Enforcement becomes guesswork
- Consumers cannot make informed decisions
- Unsafe devices continue to enter the market

Outcome

This three-tier system, combined with verified certification, delivers:

- Clarity for consumers
- Enforceability for regulators
- Flexibility for innovation
- Alignment with global regulatory trends

5. Private Use: From Loophole to Permit System

The current concept/proposal of “private use” (including labelling or stickers) is ineffective.

Key issue

- allows import and sale of non-compliant devices
- creates widespread misuse in public spaces
- is not enforceable in practice

Our position

The “private use” category must be formalised.

Recommended approach

Introduce a **formal Private Use Permit**, which:

- clearly defines where devices can be used
- is linked to a specific device, ideally serial number (not just a label)
- a scannable label proving the authenticity of the permit and the device to which it is attached
    - This links to safety and compliance verification for Queensland legality
- is enforceable (scannable label is critical for ease of enforcement)

6. Final Position

Queensland has an opportunity to lead nationally.

However, the current approach risks:

- over-reliance on enforcement, without the necessary tools
- underinvestment in system design
- exclusion of safe users
- and continued growth of non-compliant devices

Core Recommendation

Queensland should shift from:

> **“control through restriction and penalties”**

to:

> **“enablement through clear classification, permits, and verified compliance”**

Closing

Zipidi and eMobility Australia strongly encourage the Queensland Government to:

1. Replace the licence requirements with an **e-mobility permit system that does not require motor vehicle driving hours**
2. Reconsider minimum age settings to support safe access, to 12 years or the age determined by Queensland.
3. Align shared path speeds with bicycles and real-world stability
4. Adopt a **three-tier classification system** beyond EN15194
5. Require **verified certification of all vehicles and batteries, ideally supported by a digital product passport, as Europe is implementing from 2027**
6. Replace “private use” labelling with a **formal permit system**

Further technical detail and supporting evidence are available in our previous submissions.

Stephen Coulter

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