

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

Submission No: 1940

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Publication: Making the submission and your name public



10 April 2026

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Chair
State Development, Infrastructure and Works Committee
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Transport and Other Legislation (Managing E-mobility Use and Protecting Our Communities) Amendment Bill 2026

Dear Committee members,

DoorDash, Inc. (DoorDash) welcomes the opportunity to make a submission to the proposed Transport and Other Legislation (Managing E-mobility Use and Protecting Our Communities) Amendment Bill 2026 (the Bill), with a particular focus on the impacts for food delivery services, such as Doordash, operating across Queensland.

DoorDash (NASDAQ: DASH) is a technology company that connects consumers with their local businesses in more than 30 countries across the globe. Founded in 2013, DoorDash builds products and services to help businesses innovate, grow, and reach more customers. DoorDash is your door to more: the local commerce platform dedicated to enabling merchants to thrive in the convenience economy, giving consumers access to more communities, and providing independent and flexible work that empowers. DoorDash operates widely across Queensland including most major towns and regional centres, engaging Dashers who deliver to customers across the State. Dashers are independent contractors, with the flexibility to decide when, where and how much they work. The reason so many people deliver, or “dash” with DoorDash is that the platform fulfills a need that is different from employment: a way to earn extra income, without having to commit to the time, schedules, and control of a traditional employer.

Strengthening the economy and the future of work

The growth of the gig economy is fueling independent work trends globally and Queensland is no different, with more and more Queenslanders taking up the opportunity to earn flexible additional income on their own terms offered by platforms like DoorDash.

We support the Crisafulli Government’s commitment to promoting economic growth and prosperity for all Queenslanders. Achieving this will require creating an operating environment where businesses can thrive and where people have access to safe, flexible and secure work opportunities with a low barrier of entry.

DoorDash believes this Bill presents an opportunity for Queensland to become a model jurisdiction for other markets in the sensible regulation of e-mobility. A measured legislative framework can enhance safety while avoiding unintended harm to DoorDash delivery workers (“Dashers”). However, as the Bill stands, it creates barriers by adding the cost of licensing and car-focused information requirements that are not relevant or necessary for e-mobility users. The introduction of the proposed legislation is likely to result in a reduction in existing Dashers and other delivery contractors in the broader gig economy, while also discouraging new riders from taking up e-mobility delivery work. This reduction of the delivery fleet would have broader ripple effects beyond the riders themselves, including reduced availability of on-demand delivery services that support late-trading hospitality, the night-time economy, and key visitor and tourism precincts. In CBDs and entertainment areas, where e-mobility enables low-impact, efficient delivery, reduced rider participation risks undermining business viability (especially small and medium hospitality venues dependent on intermittent orders from delivery platforms), visitor experience, and broader economic activity.

Food and last-mile delivery services are now a core part of urban and suburban economic infrastructure, supporting thousands of small hospitality businesses and providing a low barrier opportunity to earn flexible income. They also underpin the night-time and visitor economies and help reduce car use, congestion, and emissions through delivery by electrically power-assisted cycles and other personal mobility devices (“e-mobility”).

Delivery services represent a distinct, commercial e-mobility use case that is not explicitly recognised in the Bill, creating a risk of unintended economic, workforce and community impacts if mitigation measures are not adopted.

Delivery riders are among the highest-frequency users of e-mobility, making them particularly sensitive to regulatory changes affecting device legality, speed and route access, rider eligibility, and enforcement practices.

Workforce exclusion through licencing

The proposed licensing requirements risk excluding e-mobility delivery riders and disproportionately impacting equity and workforce participation. Imposing licensing obligations ordinarily designed for motor vehicles, alongside increased compliance costs, is likely to reduce access to delivery work for migrants and new arrivals, students and casual workers, and low-income earners without access to cars. These impacts are economically regressive and run counter to broader workforce participation objectives.

E-mobility delivery operates in a markedly different context from private motor vehicle use. Most delivery riders work fewer than 10 hours per week and rely on the flexibility and accessibility of e-bikes and e-scooters. This model is particularly important for international students, people with disabilities, carers, retirees and workers with a primary job, many of whom do not drive and have no intention of doing so. Applying car-centric licensing requirements to e-mobility delivery risks shrinking the delivery workforce, reducing service availability, and undermining the safe uptake of compliant, low-impact e-mobility.

Although framed as a safety measure, the requirement under sections 78B and 78C that riders of e-mobility devices obtain at least a learner driver licence introduces a costly and

misaligned barrier for low-speed e-mobility delivery. The current learner licence fee of approximately \$106, combined with testing and administrative requirements, represents a significant upfront cost for riders who choose e-mobility specifically because it is a low-cost alternative to driving. For riders working limited hours or using delivery as supplementary income, this cost is likely to deter participation or force exit, without delivering a commensurate safety benefit.

The objectives of the bill to improve e-mobility safety, especially for child users, could be achieved through a more targeted application of the proposed licensing requirements. DoorDash submits that anyone under the age of 18 be required to obtain a learner permit to use an e-device.

Uncertainty for delivery e-bike operators through enforcement

DoorDash notes that the revised e-mobility definitions proposed in the Bill, combined with the seizure and forfeiture powers in Chapter 4A of the *Police Powers and Responsibilities Act 2000*, create heightened risk for e-mobility delivery riders. Riders who have purchased e-mobility devices considered legal at the time of purchase may find their devices subject to seizure overnight.

Consideration should also be given to a 12 month amnesty for e-mobility users to support transition to the new framework. An amnesty would allow riders to continue working while upgrading devices to full compliance, particularly where compliance is delayed by supply-chain constraints or extended replacement timelines. Further, if a licensing requirement is introduced for e-mobility users, a corresponding 12 month amnesty period should also apply to allow riders reasonable time to become aware of the new requirements and be given the necessary time to obtain a learner licence.

Conclusion

DoorDash's principal concern relates to the learner-licensing requirement for e-mobility delivery riders, which risks creating a disproportionate and unnecessary barrier to participation in delivery work.

DoorDash supports the Bill's goal of improving community safety. However, without careful adjustments to the proposed licensing framework, it may exclude otherwise compliant delivery riders, limit services for small businesses, and reduce availability in night-time and visitor areas. This is especially true in Brisbane and the Gold Coast CBDs and entertainment precincts that rely on low-impact, on-demand delivery.

DoorDash therefore respectfully urges the Committee and the Crisfulli Government to reconsider imposing a drivers learner-permit requirement on adult e-mobility users. This would ensure the Bill's safety objectives are upheld while delivery services continue to function as essential economic infrastructure supporting small businesses, workers, tourism and vibrant night-time economies across Queensland.