

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

Submission No: 1945

Submission By: Noosa Council

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10 April 2026

Department of Transport and Main Roads
GPO Box 1412
Brisbane, QLD, 4001

To whom it may concern

Re: Noosa Council response the *Transport and Other Legislation (Managing E-mobility Use and Protecting Our Communities) Amendment Bill 2026*, and the Queensland State Government E-Bike Enquiry.

Thank you for the opportunity to submit a response to the proposed Transport and Other Legislation (Managing E-mobility Use and Protecting Our Communities) Amendment Bill 2026. Council has also taken this opportunity to respond to recently released recommendations of the *Inquiry into e-mobility safety and use in Queensland*, which the Bill addresses.

Noosa Council commends the State Government's initiative in delivering the e-bike enquiry and its recognition of e-mobility as a valuable component of the transport system. Council strongly supports the majority of the Committee's findings and recommendations for improving safety of all road and path users (refer Attachment 1 for details), noting in particular its commitment to a coordinated, multi-agency approach to e-mobility and the provision of improved infrastructure.

However, Council is concerned that several of the proposed reforms, including the introduction of a minimum age (of 16 years), the requirement to hold a driver's licence to ride (already) legally compliant electric personal mobility devices (PMDs) and a blanket 10 km/h speed limit on footpaths are not supported by the best available evidence. A key policy of the *Noosa Transport Strategy*, and focus of the *Noosa Destination Management Plan* (DMP) is to prioritise and actively promote walking, cycling and other low emission transport modes, ahead of private car use. A key element of Council's DMP is to target and promote active and sustainable transport methods to visitors coming to Noosa, especially families with children under 16. The current proposed legislative amendments also risk Noosa Council's, the State Government's and current commercial tourism operators' return on investment into the 120 km of Noosa Biosphere Trails. The proposed legislative changes should not apply to these trails, as they are located in very remote hinterland areas with low pedestrian volumes and designated for shared use (i.e. for equestrian, pedestrian and cyclists).

Council therefore shares the concerns of other LGA's and community groups, that these measures in particular risk undermining benefits that the inquiry itself recognises, that *"the use of emobility devices in Queensland is increasing rapidly, driven by their convenience, affordability and sustainability benefits"* and that compliant devices *"form a viable and valuable component of the state's transport system"*.

Licensing riders of compliant e-bikes: Council recognises the general consensus among international transport and public-health research bodies, that requiring a licence to ride bicycles and/or low-speed e-bikes reduces participation and access to active transport, without clear evidence of improved safety outcomes. Research instead supports infrastructure design, speed management and system-level safety interventions are considered to be more effective measures. It is noteworthy that a number of other local organisations, including Bicycle Queensland, Bicycle Network and local Bicycle User Groups also support this position.

Minimum age of 16: The proposed blanket 16year minimum age is more likely to increase car dependence, make school zone congestion worse, and reduce independence. This will have a greater impact in Noosa, as ebikes provide essential mobility for teenagers in regional Queensland who lack

public transport options relative to Brisbane. There are many international examples that allow younger riders to use low powered ebikes with education and helmet requirements.

10 km/h blanket footpath limit: While it is acknowledged that the proposed universal 10 km/h limit is intended to address pedestrian safety concerns, Council believes it is impractical and likely to lead to unintended consequences. 10 km/h is barely above walking pace. This will make ebike commuting unviable, especially in regional cities with longer travel distances, a lack of safe alternative infrastructure and relatively lower pedestrian volumes. The proposal to ban all PMDs on roads with speed limits over 60km/h will particularly impact regional areas. This is because many regional roads are over 60kp/h and do not have adjoining pathways and/or alternative 60kp/h routes. PMD riders will have no options, or be forced to travel long distances at very low speeds if there is an available path. It must be recognised that LGAs have invested heavily in the construction of shared paths with the full support of the Queensland Government, as a cost-effective strategy to accommodate different user groups with conflicting needs and to promote active transport modes. As very few LGAs (including Noosa) have dedicated bike paths where this speed limit won't apply, riders may be pushed onto higher-risk road environments. This shifts the risk from pedestrian/ PMD to vehicle/ PMD conflicts. This is despite research from QUT and Griffith University which shows that shared paths operate safely at 20–25 km/h when pedestrian volumes are low. A more balanced position may be to apply lower speed limits in high pedestrian environments, rather than impose a blanket rule.

Local government impacts: Noting that these measures are likely to disincentivise active transport, LGA's like Noosa Council will need to pivot from the current strategy of providing shared paths, to fully segregated infrastructure for pedestrians and cyclists/ PMDs, including responsibility for the ongoing whole of life costs for the useful life of these additional assets. Recommendation 4 calls for *“high quality, connected and separated pathway networks”*, yet provides no funding mechanism for councils. As Noosa Council (and other regional LGA's) are unable to absorb the substantially increased cost of segregated infrastructure without substantial state funding, infrastructure delivery will be greatly delayed, or stalled and the uptake of active transport even slower as a result.

Recommendations: Council urges the State Government commit to:

1. Avoid licensing requirements for compliant e-bike riders.
2. Adopt nuanced age rules for low powered e-bikes.
3. Replace the 10 km/h blanket limit with context sensitive speed management initiatives (including more funding to better enforce existing laws and road rules).
4. Prioritise state funded separated infrastructure.
5. Focus enforcement on high-risk behaviours, not low risk riders.

Thank you again for the opportunity to make a submission. A balanced, evidence-based approach will deliver better outcomes for all. Noosa Council would encourage the State government to hold a public hearing on this matter and would be pleased to attend to ensure if the opportunity becomes available. Please contact Stephanie Ballon, Sustainable Transport Coordinator if you have any questions.

Kind Regards



Larry Sengstock

Attachments

Attachment 1 - Noosa Council Comments to Queensland State Government E-Bike Enquiry recommendations

Attachment 1 – Noosa Council Comments to Queensland State Government E-Bike Enquiry

| Noosa Council comments to <i>Queensland State Government E-Bike Enquiry</i> recommendations. | | |
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| Recommendation | | Noosa Council Comment |
| #1 | That the Queensland Government continue to recognise that compliant e-mobility devices, when used safely and responsibly, form a viable and valuable component of the state’s transport system by providing convenient and affordable short trip options, reducing car dependence, supporting environmental objectives, and removing mobility barriers and enhancing independence for some members of the community. | <ul style="list-style-type: none"> • Supported |
| #2 | That the Queensland Government implement a coordinated, multi-agency approach – encompassing regulatory amendments, strengthened enforcement, improved community education, and infrastructure investment – to enhance public safety and mitigate the key risks associated with e-mobility use. | <ul style="list-style-type: none"> • Supported <ul style="list-style-type: none"> ○ Supported in principle, noting need to support and appropriately fund existing LGA initiatives. |
| #3 | That the Queensland Government work with relevant state and national government agencies, shared e-mobility companies, and local government, to improve the collection and sharing of data regarding incidents involving PMDs and e-bikes. | <ul style="list-style-type: none"> • Supported |
| #4 | That the Queensland Government embed e-mobility into strategic transport infrastructure planning and work with local governments to achieve greater investment and delivery of high quality, connected and separated pathway networks. | <ul style="list-style-type: none"> • Supported |
| #5 | That the Queensland Government advocate for local governments to provide dedicated parking for e-mobility devices in appropriate designated areas, as determined by the local government or on private property where applicable. | <ul style="list-style-type: none"> • Supported in principle, subject to budgetary support and impact assessment |
| #6 | That the Queensland Government advocate to the Australian Government for the implementation of mandatory national safety standards for lithium-ion batteries in e-mobility devices and regulation, to enhance consumer safety and reduce the risk of fires. | <ul style="list-style-type: none"> • Supported |
| #7 | That the Queensland Government, in consultation with the Battery Stewardship Council, investigate and support local government and/or private waste disposal sites, and retail and point of sale disposal opportunities, to facilitate responsible battery disposal. | <ul style="list-style-type: none"> • Supported in principle: <ul style="list-style-type: none"> ○ LGAs incur significant costs associated with the safe disposal via licenced resource recovery suppliers. Noosa Council is investigating a |

Noosa Council comments to Queensland State Government E-Bike Enquiry recommendations.

| Recommendation | Noosa Council Comment |
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| | <p>proposal to provide a monetary incentive for battery returns to prevent incorrect (unsafe) disposal to mitigate fire related incidents at waste facilities.</p> <ul style="list-style-type: none"> ○ LGAs are incurring significant and escalating costs to safely manage batteries and battery-powered devices. These costs include investment in thermal imaging systems, dedicated containment areas, specialist galvanised bins, and purpose-built machinery capable of safely handling and isolating damaged batteries experiencing thermal runaway. Additional costs are incurred for neutralising and cooling processes, the compliant disposal of resulting hazardous wastewater in accordance with Environmental Authority licence requirements, and ongoing expenditure on specialised staff training, safety equipment and infrastructure upgrades. These cost pressures are increasing in line with the growing |

Noosa Council comments to Queensland State Government E-Bike Enquiry recommendations.

| Recommendation | | Noosa Council Comment |
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| | | <p>volume of damaged and swollen batteries entering the waste stream.</p> <ul style="list-style-type: none"> • State Government support and funding for initiatives in this regard is sought. |
| #8 | That the Queensland Government continue to support and expand education campaigns focused on e-mobility battery safety and fire risks. | <ul style="list-style-type: none"> • Supported (refer #9) |
| #9 | That the Queensland Government continue to advocate for stronger import controls relating to e-bikes and PMDs to be implemented nationally, and for stronger enforcement of these controls in order to prevent illegal and dangerous devices entering Queensland. | <ul style="list-style-type: none"> • Supported - Changes to Commonwealth Government legislation to prevent the continued importation of (currently) illegal PMDs is considered a more effected and appropriate control mechanism than the imposing speed limits on paths and/or requiring a licence for legal PMDs. |
| #10 | That the Queensland Government update state legislation to align definitions of compliant e-bikes, PMDs, and batteries with recognised product safety standards – including EN15194– Electrically power assisted cycles for e-bikes, and an equivalent product standard for PMDs, to ensure that e-mobility devices that are sold in Queensland are safe to use. | <ul style="list-style-type: none"> • Supported |
| #11 | That the Queensland Government update state legislation to provide that all e-mobility devices with an electrical power source be defined as a ‘motor vehicle’, to simplify enforcement. | <ul style="list-style-type: none"> • Council does not support the mandatory requirement for a licence to ride existing PMDs. • Council supports this proposal for non-compliant devices. • Council supports a pathway for owner of non-compliant devices to register as “motor-vehicles”, with appropriate control measures for reasonable use (as in some European jurisdictions). |

Noosa Council comments to Queensland State Government E-Bike Enquiry recommendations.

| Recommendation | | Noosa Council Comment |
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| #12 | <p>That the Queensland Government amend state legislation to expressly provide that any device that does not meet the definition of a compliant e-bike or PMD with a top speed which exceeds 25km/h, be defined as a motorcycle, moped or other appropriate classification, and make clear in the legislation that:</p> <ul style="list-style-type: none"> riders must hold an appropriate class of driver licence, such as a motorcycle licence devices must be sold by a licensed motor trader devices must be registered, and therefore meet Australian Design Standards, have a vehicle identification number (VIN), and be covered by Compulsory Third Party insurance devices must only be ridden on roads, and are prohibited from being ridden on footpaths and bike paths riders must wear a motorcycle helmet that complies with appropriate product safety standards. | <ul style="list-style-type: none"> Supported in principle (Noosa Council does not support the licencing requirements for existing legal PMDs). |
| #13 | <p>That the Queensland Government amend legislation to provide that:</p> <ul style="list-style-type: none"> e-bikes and PMDs can only be ridden by individuals aged 16 years and over riders of e-bikes and PMDs be required to hold at least a Queensland Class C learner licence which requires completion of the PrepL online learning and assessment program this requirement does not apply to e-wheelchair and other accessibility device users. | <ul style="list-style-type: none"> Not Supported – This provision should only apply to devices that are not compliant under current law. |
| #14 | <p>That the Queensland Government amend legislation to reduce the speed limits on all footpaths, for all e-mobility devices, to maximum 10km/h.</p> | <ul style="list-style-type: none"> Not Supported |
| #15 | <p>That the Queensland Government amend legislation to prescribe an offence of riding an e-mobility device on a footpath in the vicinity of a pedestrian without due care and attention.</p> | <ul style="list-style-type: none"> Supported in principle, subject to State commitment to properly resource enforcement. |
| #16 | <p>That the Queensland Government support local governments to use local laws to regulate e-mobility devices including setting lower speed limits for high pedestrian traffic zones and pathways.</p> | <ul style="list-style-type: none"> Supported in principle, noting that the application of speed limits in high risk areas (i.e. with high pedestrian demand) is preferable to imposing a universal 10km/h speed limit on all footpaths and shared paths. |
| #17 | <p>That the Queensland Government and local governments increase and improve signage of speed limits on footpaths and requirements to give way to pedestrians.</p> | <ul style="list-style-type: none"> Supported in principle, noting that LGA is the primary manager of local roads and paths and will continue to apply due |

Noosa Council comments to Queensland State Government E-Bike Enquiry recommendations.

| Recommendation | | Noosa Council Comment |
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| | | care and discretion in this regard. |
| #18 | That local governments stipulate that shared scheme operators use technology to prohibit the use, or limit the speed of shared devices to 10km/h or lower in identified high pedestrian zones. | <ul style="list-style-type: none"> • Support in principle, noting that 10km/h speed limits can already apply in shared and high pedestrian demand zones |
| #19 | <p>That the Queensland Government amend laws to require that e-mobility devices sold in Queensland for on-road use align with recognised mechanical and electrical safety standards (such as EN15194:2017 for e-bikes and an equivalent standard for PMDs).</p> <p>That non-compliant devices sold for use on private property only, are to be clearly marked with permanent and visible markings that indicate for consumers and enforcement officers that the device is ‘for use on private property only’ and that there be appropriate penalties for retailers and riders for non-compliance.</p> | <ul style="list-style-type: none"> • Supported in principle, noting that complimentary changes to Commonwealth Government legislation would be more effective. |
| #20 | That the Queensland Government introduce anti-tampering laws that prohibit the sale and use of modification kits or assistance by retailers to increase the power and speed of e-mobility devices. | <ul style="list-style-type: none"> • Supported in principle, subject to impact assessment and extensive community consultation. Complimentary changes to Commonwealth Government legislation would be more effective. |
| #21 | That the Queensland Government support retailers to provide information and educational resources at the point of sale, including information about compliance with safety standards, road rules and penalties for non-compliance, battery safety and disposal, and the legal use of the device on public roads and pathways. | <ul style="list-style-type: none"> • Supported in principle. (refer to #2 and #7) |
| #22 | That the Queensland Government amend laws to ensure that the Queensland Police Service has sufficient power to seize and impound an illegal e-mobility device on a first offence. This should include the ability for the Queensland Police Service to dispose of, or destroy, the device. Fines should be set at an appropriate level to cover costs associated with disposal of the illegal device. | <ul style="list-style-type: none"> • Supported in principle, subject to impact assessment and extensive community consultation • Council supports a pathway for owner of non-compliant devices to register as “motor-vehicles”, with appropriate control measures for reasonable use (as in some European jurisdictions). |

Noosa Council comments to Queensland State Government E-Bike Enquiry recommendations.

| Recommendation | | Noosa Council Comment |
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| #23 | That the Queensland Government review, with a view to strengthening, the existing penalties for offences associated with the most significant risk factors, including riding an illegal device, riding at excessive speed, failure to wear a helmet, riding under the influence of alcohol or drugs, and hooning. | <ul style="list-style-type: none"> Supported in principle, subject to impact assessment and extensive community consultation. |
| #24 | That the Queensland Government amend laws to enable the State Penalties Enforcement Registry (SPER) to pursue 16 and 17 year old riders who breach e-bike and PMD regulations. | <ul style="list-style-type: none"> Supported in principle, subject to impact assessment and extensive community consultation. |
| #25 | That the Queensland Government amend laws to provide that the parent/guardian can be pursued for penalties for breaches of e-mobility device regulations by children under 16 years of age. | <ul style="list-style-type: none"> Supported in principle, subject to impact assessment and extensive community consultation. |
| #26 | That the Queensland Government amend laws to ensure that e-bike or PMD riders under the influence of alcohol or drugs can be dealt with in the same way as alcohol or drug impaired drivers of motor vehicles on roads, including undertaking Random Breath Tests. | <ul style="list-style-type: none"> Supported |
| #27 | That the Queensland Government implement a wide-ranging community education campaign outlining the rules and changes to the rules, governing e-bike and PMD use to ensure the community is well informed of the changes. | <ul style="list-style-type: none"> Supported in principle (refer #2) |
| #28 | That the Queensland Government provide guidelines to assist schools to promote safe and compliant riding behaviours and set clear expectations for students travelling to and from school, that inform the school community about any changes to e-mobility regulations, road rules, what are legal devices, and safe riding behaviours. | <ul style="list-style-type: none"> Supported in principle (refer #2) |