

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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Executive Summary

Pedal Group, trading as retailer 99 Bikes & wholesaler Advance Traders, is Australia's largest bicycle and e-bike retailer. We are committed exclusively to the sale of legally compliant, EN15194-certified e-bikes and have a direct interest in ensuring Queensland's regulatory framework is effective.

We strongly support the Bill's intent to remove dangerous, illegal, and non-compliant e-mobility devices from Queensland streets.

However, we are concerned that the three following provisions of the Bill will significantly restrict access to safe, compliant e-bikes without meaningfully addressing the underlying safety issues the legislation seeks to solve:

- The **C-class licence** requirement;
- The **under-16 age** restriction; and
- The **blanket 10km/h** footpath speed limit.

We urge the Committee to amend these three provisions while preserving the Bill's core enforcement framework.

Our position aligns with that of We Ride Australia, the national independent voice for cycling, which has formally called for the same three amendments.

1. EN15194 Compliance Priority — Not Restricting Access to Safe Bikes

The central problem driving e-mobility injuries and community concern is the proliferation of illegal, non-compliant devices, unregistered high-powered bikes that exceed safe speed and power limits, and low-quality products that do not meet any recognised safety standard. This is the problem the legislation should solve.

EN15194 is the internationally recognised standard that defines a safe, road-legal e-bike. Bikes built to this standard are limited to 250W continuous motor output and 25km/h assist speed, making them functionally equivalent to a conventional pedal bicycle for the purposes of road risk. The entire regulatory effort should be directed at ensuring only EN15194-compliant devices are sold and ridden in Queensland, not at restricting how Queenslanders access those already-safe products.

We note with approval that NSW has now legislated EN15194 as the defining standard for a road-legal e-bike under its Road Transport Legislative Amendment. Queensland should adopt the same framework as the foundation of its approach: EN15194 compliance draws the line between a legal e-bike and a prohibited device.

Pedal Group's submission to the original Parliamentary Inquiry recommended strengthened import controls and enhanced retail compliance obligations, all of which target the actual source of harm. We reiterate those recommendations here and note that focusing enforcement at the point of importation and sale of non-compliant products is far more effective than imposing access restrictions on compliant riders.

2. The Licencing Requirement Should Be Removed

We support We Ride Australia's call for the removal of the C-class licence requirement for riders of EN15194-compliant e-bikes.

A C-class licence is designed for motor vehicles. An EN15194-compliant e-bike is not a motor vehicle. It is a pedal bicycle with limited electric assist that cannot exceed 25km/h under motor power. Requiring a licence to ride one is inconsistent with how every comparable jurisdiction in the world classifies these devices, and introduces a significant and unjustified access barrier.

The practical impact is severe. Many of the Queenslanders who stand to benefit most from legal e-bikes; seniors, people with disabilities, financially disadvantaged commuters, and international visitors — either cannot obtain or do not hold a C-class licence. As We Ride Australia has noted, this raises an additional direct question for the 2032 Brisbane Olympics: how will tens of thousands of international visitors move around South East Queensland if they are unable to legally ride an e-bike without a local licence?

The licensing requirement also does nothing to address the actual safety risk. The riders causing harm are overwhelmingly riding non-compliant, high-powered devices rather than legally compliant pedal-assist bikes. Imposing a licence requirement on compliant riders does not change the behaviour of non-compliant riders in any way.

We agree with We Ride Australia that non-compliant devices; those exceeding EN15194 speed, throttle, and power limits should be classified as motor vehicles and subject to full licensing, registration, and insurance requirements.

3. The Age Restriction Should Be Reconsidered

We support We Ride Australia's call for reconsideration of the blanket under-16 age restriction as it applies to EN15194-compliant e-bikes.

Safe, compliant e-bikes provide enormous benefits to teenagers: independent travel to school and part-time work, reduced car dependency around school gates, and meaningful physical activity at an age when sedentary behaviour is a documented public health crisis. As Pedal Group's original submission noted, fewer than half of Australian children meet daily physical activity recommendations, and the current screen time epidemic needs greater access to exercise & outdoor activities. Safe cycling, that includes compliant E-bikes, is one of the most practical available responses to the alarming physical & mental health trends.

A blanket age restriction treats an EN15194-compliant e-bike the same as a prohibited high-powered device, missing the underlying issue. If the Bill's other provisions are enacted, particularly those targeting illegal devices at the point of importation and sale, a teenager riding a compliant e-bike to school presents no greater risk than a teenager riding a conventional bicycle.

We ask the Committee to consider a risk-proportionate approach: prohibit under-16s from riding non-compliant devices, but permit access to EN15194-compliant bikes with appropriate safety conditions such as helmet requirements that are enforced.

4. The Blanket 10km/h Footpath Limit Should Be Removed

We support We Ride Australia's call for the removal of the blanket 10km/h limit on all footpaths and shared paths.

Queensland has invested substantially in dedicated bikeways and high-capacity shared paths designed for commuter cycling at normal cycling speeds. A blanket 10km/h limit would make these routes functionally unusable for their intended purpose. This will lead to riders not comfortable or those that do not feel safe riding with traffic, onto roads with cars, that will directly increase the amount of accidents and fatalities.

The safety objective of preventing conflicts with pedestrians is entirely legitimate. However, it should be achieved through targeted rules that apply where bikes genuinely mix with pedestrian traffic, not through a blanket limit that applies equally to a busy pedestrian mall and a dedicated commuter cycleway.

We urge the Committee to replace the blanket limit with context-specific speed rules: a reduced speed limit where bikes share space with pedestrians, and normal e-bike speeds on dedicated bikeways and paths where pedestrian conflict is low.

5. The Fuel Crisis Makes This Amendment More Consequential

The Committee should be aware that Queensland consumers are actively turning to e-bikes as a direct response to the current fuel crisis. Petrol prices on the east coast have surged by 15 to 20 per cent since early March 2026, reaching above \$2.50 per litre in many areas, driven by disruption to global supply through the Strait of Hormuz. Household fuel costs have increased by approximately \$40 per week compared to prior years — a material imposition on working families.

E-bikes offer a genuine, practical, and affordable alternative for short-to-medium commutes. Running costs are typically \$20 to \$80 per year in electricity, compared to over \$1,200 per year in petrol for an equivalent car commute. Demand for legal, compliant e-bikes at 99 Bikes stores is rising sharply as a direct consequence of this cost pressure.

The timing of this legislation matters. Introducing a licensing requirement, an age restriction, and a blanket 10km/h footpath limit at precisely the moment when Queenslanders most need accessible, affordable transport alternatives would be counterproductive — both for household budgets and for the state's transport and emissions objectives. It risks pushing consumers toward non-compliant, cheaper, and less safe products rather than toward the legal E-bikes that the Bill should be encouraging.

Summary of Requested Amendments

Pedal Group calls on the Committee to amend the Bill in three respects, consistent with the position of We Ride Australia:

1. **Remove the C-class licence requirement** for riders of EN15194-compliant e-bikes. Licensing requirements should apply only to non-compliant devices classified as motor vehicles.
2. **Reconsider the under-16 age restriction** as it applies to EN15194-compliant e-bikes, adopting a risk-proportionate approach that distinguishes between compliant and non-compliant devices.
3. **Remove the blanket 10km/h footpath speed limit** and replace it with targeted rules that reduce speeds where bikes genuinely mix with pedestrians, while preserving normal riding speeds on dedicated bikeways.

We strongly support all other provisions of the Bill directed at removing non-compliant devices from the market, strengthening enforcement at the point of importation and retail sale, and giving police effective tools to address dangerous riding. These are the right interventions. The three amendments we seek do not weaken any of them. They simply ensure that the legislation does not inadvertently restrict access to safe, legal, and increasingly essential transport for Queenslanders.