

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

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State Development, Infrastructure and Works Committee
Parliament House
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Attention: Submission regarding Transport and Other Legislation (Managing e-mobility use and protecting our communities) Amendment Bill 2026

Dear State Development, Infrastructure and Works Committee,

Thank you for the opportunity to provide input into this inquiry. E-mobility plays an important role in creating a more accessible, affordable, and sustainable transport system, with e-bikes being the most competitive alternative to car ownership due to their ability to address barriers such as age, ability, topography, distance, fitness levels and topography. E-mobility provide an opportunity for travel choice (particularly in a cost-of-living crisis and for people who can not drive) and to reduce congestion on our roads. Below is a summary of key opportunities and recommendations that we would like the inquiry committee to consider before implementing legislative change.

Executive summary

Zwart Transport Planning (ZTP) welcomes the Queensland Government's strong intent to address the very real safety issues associated with illegal, high-powered e-mobility devices and unsafe riding behaviour.

We strongly support measures that:

- improve point-of-sale clarity and compliance
- strengthen police seizure and enforcement powers
- improve parking behaviour and pedestrian access
- target dangerous illegal devices that are currently undermining public confidence in e-mobility.

However, in its current form, the Bill captures safe, legal pedal-assisted e-bikes and low-speed e-mobility devices that are not the source of the identified safety problem. These devices have been in use for more than 20 years with no major crash history. This would disadvantage current law-abiding citizens.

From a transport planning, accessibility and liveability perspective, the proposed licensing requirement, blanket 10 km/h path speed limit, and 16-year age minimum create significant unintended consequences. These changes risk reducing transport choice, increasing car dependence, worsening safety outcomes by forcing riders into mixed traffic, and disproportionately affecting older adults, young people, women, people with disability, international tourists and students and those already least served by the transport network.

ZTP recommends the Bill be amended to better distinguish illegal high-risk devices from legal pedal-assisted e-bikes and other legitimate mobility aids, while retaining the strong enforcement and compliance measures that target the real safety problem.

About us

Zwart Transport Planning is a sustainable transport planning company based in Brisbane with over 30 years experience in the specialist field of active transport planning and design. We are passionate about planning for people and creating places for everyone to use and enjoy. Our work is grounded in a people-first approach to transport planning, with a focus on access, equity, independence, liveability and mode shift.

Since our 2025 inquiry submission, our position remains consistent: safe, legal e-bikes are one of the most effective alternatives to private car dependence, particularly for short local trips, first/last mile connections, ageing in place, and accessible travel.

Summary position on key Bill elements

Bill element	Bill element	Bill element
Stronger police seizure powers for illegal devices	Support	Targets the real safety issue and improves enforceability
Parking offences and shared scheme accountability	Support	Improves pedestrian amenity and shared path usability
25 km/h maximum design speed for PMDs	Support	Existing e-bike limit of 25km/hr is suitable to adopt for PMDs
Mandatory compliance labelling / clearer legal definitions, New e-bike safety standard	Support in principle, amend transition pathway	Support clearer compliance pathways, but must not retrospectively criminalise existing legal devices. Must recognise legacy legal devices and provide free post-sale compliance pathway
Driver's licence requirement for legal e-bikes	Do not support	Creates unnecessary barriers for safe users, older people, people with disabilities and international tourists/students
10 km/h speed limit on footpaths and shared paths	Do not support	Operationally impractical, unsafe for riders as per TMR Speed Management on Shared Paths guideline
Minimum rider age of 16	Do not support in current form	Reduces youth independence and increases family car reliance, and reduces ability to address congestion around schools

Benefits of e-mobility

- **Affordability:** Offers a low-cost alternative to car ownership, particularly valuable for low-income households replacing a second vehicle. Analysis shows the Australian household could save up to \$1,500 every month by swapping the car for a bicycle by saving cost of car insurance, loan repayments and fuel (particularly in a fuel crisis).

- Transport choice: Increases flexibility for short trips and first/last-mile connections, particularly in areas with lower service of public transport (e.g. regional or rural locations).
- Accessibility: Supports independent travel for people with limited mobility or fitness.
- Equitable access: These modes are attractive to and increasingly used by women, older people and young people who have previously not felt comfortable on traditional bikes.
- Health: Encourages active transport by reducing barriers to cycling. E-bikes boost physical activity by making cycling more accessible to a wider range of fitness levels. More people can engage in regular exercise with less strain on their body inviting a lower threshold to participate in this activity.
- Climate action: Supports emissions reduction and net-zero transport goals.

Key concerns with the Bill

Licensing requirements create a major accessibility barrier

Requiring a valid driver's licence or learner eligibility for legal e-bike use introduces a barrier unrelated to the actual risk profile of a speed-limited pedal-assisted bicycle.

This disproportionately affects:

- older adults who have voluntarily stopped driving but rely on e-bikes for independence
- people with disability, including intellectual disability and other conditions affecting driving eligibility
- people using prescribed adaptive e-trikes
- people unable to afford driving costs
- tourists and international visitors and students
- people who deliberately choose car-free lifestyles.

For many users, this is not a recreational device. It is a car substitute that supports work, shopping, exercise, social connection and independent living.

Wal, 96, gave up his driver's licence many years ago to avoid the rigmarole of or medical tests.

He has ridden a bike his whole life and now relies on his e-bike for everyday trips, whether it's shopping, getting to bridge competitions, or riding with his son every Friday. His e-bike gives him something incredibly valuable, independence, mobility and regular exercise.

At 96, he no longer has the fitness, strength or joint mobility for a standard bike, so the electric assistance is not just helpful, it's essential. Under the proposed changes, the driver's licence requirement would mean Wal is no longer able to legally use the e-bike he depends on every day.

And if he could, a 10km/h speed limit is below the speed he needs to stay balanced and stable on the bike.



The 10 km/h speed limit is impractical

A blanket 10 km/h speed limit across footpaths and shared paths is inconsistent with rider stability, path function and existing infrastructure design.

In practice, this measure may:

- create low-speed instability and increase fall risk, as noted in [TMR's Speed Management on Shared Paths guidelines](#)
- push riders into 50–60 km/h traffic environments
- undermine the utility of shared paths and rail trails and render the majority of our active transport infrastructure unusable
- discourage women and less confident riders who are more reliant on separated infrastructure
- reduce the viability of cargo bikes and family cycling.

[Recent research](#) undertaken in Melbourne found that men are more likely to ride longer distances on separated cycling infrastructure, while women, due to trip chaining – dropping children at school, collecting groceries, and travelling to and from work – are more likely to make shorter local trips along busy roads where the same level of protected infrastructure is often not provided. Research also shows women face greater barriers to riding where safe, separated infrastructure is missing, despite e-bikes being particularly valuable for carrying children, shopping and other daily tasks. Women are therefore disproportionately disadvantaged by this bill, because it affects the very trips e-bikes make possible: short, practical, care-based journeys that replace car travel. If women do not feel safe riding on roads alongside fast-moving traffic, many will simply stop riding altogether, undermining both transport equity and the broader policy goal of reducing congestion and emissions. The same will be the case for children.

It is also important to recognise that overly restrictive rules risk driving widespread non-compliance, ultimately undermining the intent of the legislation. The implementation of this bill must carefully consider the circumstances in which police enforcement of speed limits is expected to occur, including how officers will reasonably determine when a rider has exceeded a prescribed threshold. Speed limits should be reserved for locations where lower operating speeds are genuinely necessary to manage risk, rather than applied uniformly across all settings regardless of context.

A more proportionate approach would be to adopt context-based speed management in areas of very high pedestrian conflict. This could include applying a low but stable speed environment (e.g. 12 km/h) in highly pedestrianised precincts such as the Brisbane CBD, or requiring riders to dismount and walk in the highest conflict spaces, such as existing rules in Queen Street Mall. By contrast, a blanket 10 km/h limit across all shared environments makes it difficult to distinguish between places where very low speeds are essential and places where they unnecessarily reduce the practicality and attractiveness of e-bike use. A place-based framework would better align speed expectations with actual risk, improve user understanding, and support more targeted, credible enforcement.

It's important also to recognise that the unintended consequence of this speed limit may result on more e-mobility on roads where they are significantly more vulnerable to serious injury or death. A legal e-bike riding at maximum 25km/h will feel the significant speed differential with cars with fatal consequences if drivers do not see these drivers and pass wide.

The 16-year minimum age may increase car dependence and puts pressure on busy families

The proposed age limit removes an important independent travel option for responsible young people accessing:

- school
- part-time work
- sport and social activities
- first/last mile public transport.

The likely consequence is not mode shift to walking, but greater reliance on already time-poor parents for car trips, increasing traffic congestion and reducing youth independence during formative travel behaviour years.

An age restriction of 16+ years old restricts its use in the critical formation years when youth are building independence but have limited transport options. Queensland's existing child employment legislation states:

- o Age 11+ for delivery work.
- o Age 13+ for most jobs.
- o Under 16s subject to regulated hours and parental consent.

Age restrictions, if they're truly required, should be aligned with the age where youth start to build independence and responsibility.

Disability and prescribed device gaps remain unresolved

The Bill currently provides no clear pathway for:

- health practitioner prescribed adaptive cycles
- occupational therapist supported e-trikes
- users who require electrical assistance due to reduced strength, coordination or endurance.

This is a significant gap that risks disproportionately impacting people who already face transport exclusion.

Change in the legal e-bike definition risks retrospectively criminalising compliant legacy devices

The Bill's proposed shift to EN15194 2017:A1 as the defining legal standard creates a significant transition risk for Queensland's existing e-bike fleet. As Bicycle Queensland has highlighted, the vast majority of the more than 200,000 legal e-bikes sold in Queensland since 2017 were purchased in good faith under the then-applicable legal framework and may not carry the exact compliance markings or specification requirements of the newer 2023 European update. This means a substantial proportion of devices that are currently safe, speed-limited and lawful could become technically non-compliant overnight, despite presenting no greater safety risk than when they were purchased.

From a policy and consumer confidence perspective, retrospective non-compliance would undermine trust, create confusion for riders and enforcement officers, and risk significant financial impacts for households, retailers, tourism operators and shared fleet providers. ZTP supports clearer compliance standards, but strongly recommends a legacy recognition and free post-sale certification pathway so existing lawful e-bikes are not unintentionally rendered illegal.

Misaligning with Brisbane 2032 Olympic and Paralympic targets

The Bill also creates unintended consequences for the Brisbane 2032's transport commitments and the broader legacy Queensland is trying to build. A central pillar of the Games transport strategy is the target for 90% of trips to venues to occur by public or active transport, reflecting the long-standing "zero-car Games" principle that underpins modern Olympic delivery. Measures that make e-bikes and other low-emission micromobility modes less intuitive, less attractive or legally ambiguous risk working directly against that objective.

For many spectators, workforce, volunteers and local residents, e-bikes will be the most practical way to complete the critical "first and last mile" between stations, accommodation and venues. If regulation creates unnecessary barriers to uptake or discourages everyday use in the years leading up to 2032, it

may undermine behaviour change precisely when Queensland needs to be normalising active transport at scale.

This concern is amplified when considering the experience of international visitors from more than 200 nations who will arrive from cities where shared bikes, e-bikes and other micromobility devices are already a familiar part of the transport system. A highly restrictive (e.g. drivers license requirement) or uniquely local rule set (e.g. 10km/h on all paths) risks creating confusion about what is legal, where devices can be used, and how speed limits apply across different environments.

At a time when Games planning is meant to showcase Brisbane as a connected, accessible and globally legible city, overly complex rules could generate uncertainty for visitors.

Recommended amendments

ZTP recommends the Committee amend the Bill to:

- Retain strong enforcement against illegal devices, including seizure powers and retail compliance obligations.
- Remove the driver's licence requirement for legal e-mobility devices.
- Replace the blanket 10 km/h rule with context-sensitive speed management in high pedestrian activity areas which has a minimum allowable speed of 12km/h, however removes restrictions in lower-pedestrianised suburban, regional or rural areas.
- Reduce or remove the 16-year minimum age for legal e-bikes and e-scooters
- Create explicit exemptions and prescription pathways for adaptive e-bikes and e-trikes for personas with a disability, impairment etc.
- Provide a free and simple post-sale compliance certification pathway for existing legal e-bikes.
- Commit parallel investment into separated active transport infrastructure, noting regulation alone cannot solve infrastructure conflict.

Closing

ZTP supports decisive action on illegal and dangerous e-mobility devices.

However, the current Bill risks undermining safe, legal e-bike use and unintentionally reducing access to one of Queensland's most practical alternatives to car travel.

The strongest policy response is one that targets the source of harm without weakening transport choice, accessibility and liveability outcomes for the wider community.

We appreciate the opportunity to provide this submission to the Committee.

Yours sincerely



Jerryn Zwart

DIRECTOR

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