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

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Uber Eats

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Uber Eats Submission

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Executive Summary

Uber Eats Australia (Uber) welcomes the opportunity to provide feedback on the *Transport and Other Legislation (Managing E-mobility Use and Protecting Our Communities) Amendment Bill 2026*.

Uber supports the Government's objective of improving e-mobility safety and addressing community concerns regarding unsafe and non-compliant devices. These are legitimate issues that warrant a strong, targeted and evidence-based regulatory response.

At the same time, it is critical that the Bill distinguishes between unsafe behaviour and the safe, lawful use of e-bikes, which now play an integral role in Queensland's transport system and broader economy. Delivery riders represent a distinct, high-volume cohort operating at scale across urban environments. Regulation should reflect this.

E-mobility is part of a broader structural shift in how goods move through cities. As on-demand delivery grows, reliance on cars and vans for short-distance trips increases pressure on congestion, curb space and urban infrastructure. E-bikes provide a more efficient, lower-impact alternative, particularly in high-density and inner-city areas where traditional vehicles are less effective and parking is more challenging.

This shift is being reinforced by rising fuel costs and broader cost-of-living pressures. Low-cost, low-emission transport options such as e-bikes are increasingly important to maintaining affordable, reliable delivery services. Regulatory settings that unintentionally constrain this mode risk increasing costs for businesses and consumers, while reducing network resilience and service reliability.

A proportionate, risk-based framework, focused on behaviour, safety outcomes and practical enforcement, will deliver the strongest outcomes. By contrast, blunt or misaligned measures risk limiting safe e-bike use while failing to address the behaviours that are the source of community concern.

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Uber's Recommendations

Age and licensing requirements

E-mobility delivery operates in a fundamentally different context to private motor vehicle use. A driver licence is designed for operating motor vehicles in high-speed environments. E-bikes operate in lower-speed, urban and shared contexts. The risks are different, and the regulatory response should reflect this. Remove the learner driver licence requirement and replace it with a targeted e-mobility safety accreditation model aligned to the risk profile of e-bikes.

Transitional arrangements

Introduce a clear amnesty period to allow riders to transition to new requirements without loss of income, recognising supply chain constraints.

Support regulatory changes with appropriate infrastructure investment and safe integration planning

Regulatory changes alone will not improve safety if riders continue to operate in environments not designed for e-mobility and cycling. Investment in appropriate infrastructure and integrated planning is critical to reduce conflict between users and ensure safe, efficient operation.

Uber's Commentary on Implementation

Appropriate Allocation of Responsibility

Uber strongly supports the Bill's approach of placing responsibility for compliance on individual riders, supported by enforcement powers and targeted obligations on device sellers.

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Bicycle Safety at Uber: A Targeted Approach

Safety is a top priority at Uber Eats. We have invested in a targeted, system-enforced safety model that combines mandatory equipment, real-time verification and ongoing education to support safe two-wheeler delivery.

Uber provides free, purpose-designed personal protective equipment (PPE) to all delivery people using bicycles, e-bikes, mopeds and motorbikes across Australia and New Zealand. This includes high-visibility vests, weather-resistant jackets and delivery bags, developed in consultation with delivery people to ensure practical, real-world usability. Importantly, delivery people cannot go online until PPE delivery has been verified through our suppliers, meaning uptake is validated through third party suppliers rather than left to individual discretion.

In addition, delivery people must complete real-time identity and helmet verification checks before going online. These controls ensure that core safety requirements are not optional, but embedded directly into how the platform operates.

This is complemented by a strong education framework. All delivery people are required to complete mandatory bike safety training at onboarding and annually thereafter, including modules on e-bike compliance and safe lithium-ion battery use. Since 2021, Uber has partnered with We Ride Australia to develop jurisdiction-specific guidance on compliant e-bikes and battery safety, alongside input from Bicycle NSW.

Beyond formal training, Uber delivers ongoing safety education through monthly communications informed by expert guidance, including from Fire and Rescue NSW on the safe use, charging and storage of lithium-ion batteries. We would welcome the opportunity to continue strengthening this content in partnership with the Queensland Government.

Uber was also a founding signatory of the Food Delivery Platform Safety Principles, which is an industry-led initiative developed in partnership with other major platforms. These principles establish a consistent, national approach to safety across the sector, focusing on five key pillars: safe design of work, safety training for delivery people, the provision of high-quality personal protective equipment (PPE), proactive community engagement, and ongoing investment in road safety research. By formalising these shared standards, Uber ensures that safety is treated as a pre-competitive necessity, driving continuous improvement across the entire Queensland delivery ecosystem.

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Finally, Uber supports safer fleet uptake by partnering with Zoomo to offer subsidised access to commercial-grade e-bikes. These vehicles are purpose-built for the rigours of delivery work, featuring integrated GPS tracking and high-performance braking. Taken together, these measures demonstrate that Uber's approach to bicycle safety is proactive, data-led and system-enforced, delivering high levels of compliance while maintaining access to flexible earning opportunities.

The Importance of E-Mobility in Queensland

Supporting Businesses and Earning Opportunities in Queensland

We share the Crisafulli Government's commitment to fostering economic prosperity for all Queenslanders—a goal that relies on an operating environment where businesses can innovate and the community can access flexible, low-barrier earning opportunities. Today, delivery services have evolved into essential economic infrastructure that underpins this vision. To show the scale and importance of the sector this Bill will affect, we have outlined key data points across delivery activity and supply chains in Queensland.:

- **Delivery Community Scale:** Uber provides flexible earning opportunities to over **30,000 delivery people** across Queensland. These delivery people use a range of modes to deliver which include cars, electric cars, motorcycles, bikes and e-bikes.
- **Critical Reliance** In high-demand metropolitan precincts, cycling has become a primary mode of transit**. In the Brisbane CBD, bicycles account for approximately 54% of all trips,** while **South Brisbane follows closely at 44%**. This trend extends beyond the capital; in Gold Coast suburbs like Bundall, we are now seeing 36% of trips taken by bike.
- **Supporting the Local Business Backbone** Our platform serves as a critical infrastructure partner for Queensland's small business sector, now supporting **close to 10,000 merchant partners**. By bridging the gap between local businesses and their customers, we have established a network that reaches **over 90% of the state's community**, ensuring that both urban and regional areas remain connected to the modern economy.
- **Dedicated Regional Support** We believe that access to essential services should not be defined by geography. In 2025, we deepened our commitment to the state by launching in **nearly 20 new regional towns**. This expansion has brought reliable delivery for groceries, retail, and dining to previously underserved areas, providing local merchants with the digital tools they need to thrive and ensuring regional residents have consistent access to the goods they need.
- **Uber is a key partner in Queensland's grocery supply chain:** Between the Uber Eats app and Uber Direct (which handles deliveries directly for stores like Woolworths and Coles), delivery people **move millions of grocery items every month.**

- **Vulnerable Demographics:** We provide vital earning opportunities for students, migrants, and low-income Queenslanders who use e-bikes as a lower-cost alternative to car ownership.

The growing delivery task and the role of e-bikes in urban logistics

Uber commissioned *The Future of Delivery: Unleashing the Potential of Micromobility for the Last Mile* in 2021 to assess the impact of rising delivery demand on urban logistics. The report highlights increasing pressure on last-mile systems and the important role of e-bikes in delivering more efficient, lower-emissions outcomes for cities.

Demand for delivery is growing rapidly across food, grocery and parcel sectors, with global parcel volumes projected to more than double by 2030. At the same time, the “last mile” is the most complex and costly part of the logistics chain, accounting for around 53% of total delivery costs and placing increasing pressure on urban roads and infrastructure.

E-bikes offer a practical solution to these challenges. They can bypass congestion, complete more deliveries per hour and operate at lower cost, while producing zero emissions. They also provide efficiency and access to inner city areas where parking is constrained. Shifting deliveries to two-wheeled modes improves efficiency, reduces pressure on road networks and supports better outcomes for cities, businesses and consumers.

Environmental Benefits and Fuel Neutrality

E-bikes deliver clear and growing benefits for Queensland’s transport network, particularly as delivery demand increases. Shifting short-distance trips from cars and vans to e-mobility reduces pressure on road infrastructure, decreases congestion, and improves overall network efficiency. The smaller footprint and manoeuvrability of e-bikes allow them to operate effectively in dense urban environments, reducing competition for limited road and kerb space while enhancing urban amenity through reduced noise and emissions.

Beyond environmental outcomes, e-mobility provides a critical "fuel neutral" pathway for economic participation. At a time of global energy instability and rising cost-of-living pressures, e-bikes offer a lower-cost, fuel-independent model for income generation. Unlike traditional delivery vehicles, e-bikes are less exposed to petrol price fluctuations, ensuring the delivery community remains resilient and accessible to those most affected by economic uncertainty.

Regulatory settings that introduce additional friction risk limiting access to these lower-cost, sustainable options. Ensuring that e-bikes remain an accessible, low-barrier transport mode is essential for maintaining a stable, responsive, and green delivery network across Queensland.

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Opportunities to Strengthen the Bill

Licensing Requirements Imposed on e-bike riders (Section 3.2)

The requirement under sections 78B and 78C that riders of EPACs and PMDs obtain at least a learner driver licence is a disproportionate and a misaligned policy response for the following reasons:

1. **Misalignment with the activity being regulated**

E-mobility delivery operates in a fundamentally different context to private motor vehicle use. A driver licence is designed for operating motor vehicles in high-speed environments. E-bikes operate in lower-speed, urban and shared contexts. The risks are different, and the regulatory response should reflect this.

The requirement does not address the key risks associated with e-bike use, including visibility, pedestrian interaction and safe navigation. Instead, it applies a car-based framework to a non-car activity.

Uneven impact across the community

The requirement is likely to have a greater impact on people who already face barriers to employment or mobility, including those with disability, older Queenslanders, and people who are newer to Australia

- **Primary Demographic Impact:** Uber's data indicates that a significant proportion of two-wheel delivery partners join the platform using an international passport (89%). This highlights the role e-bikes play in providing accessible, flexible earning opportunities for people who may be newer to Australia or may not yet have access to a driver licence. It underscores the importance of ensuring regulatory settings support safe, practical and inclusive transport options, rather than unintentionally limiting access to entry-level modes of work.
- **Absence of Alternative Licensing:** Notably, this data also indicates that the vast majority of this cohort did not—or could not—provide an overseas driver licence when given the opportunity during onboarding. A significant proportion of delivery people are unlikely to hold either a local or overseas driver licence, including those on working holiday visas and international students, many

of whom may not have driven in their home country. As a result, such requirements would risk being disproportionately exclusionary.

- **Scale of Disruption:** Consequently, the impact on the delivery community would be immense. It would exclude a significant portion of delivery partners who rely on e-bikes because they do not hold a motor vehicle licence. This includes many on working holiday visas and international students, who may not have driven in their home country. As a result, the requirement would be disproportionately exclusionary in practice.
- **Downstream Impacts on the Hospitality Sector:** A decline in delivery partner availability would create significant operational challenges for close to 10,000 merchants across Queensland who rely on our network to reach their customers. Fewer delivery partners means longer wait times for orders to be picked up and delivered. This would lead to delays, reduced reliability, and a poorer customer experience. Restaurants would become increasingly frustrated with meals taking longer to be collected, particularly during peak periods, which could impact customer satisfaction and undermine confidence with delivery platforms. In the lead up to the 2032 Olympic and Paralympic Games, where tourism and hospitality are expected to play a critical role in economic growth, such inefficiencies would be a negative outcome for the sector and broader Queensland economy.

2. **Cost and administrative burden**

The proposed licensing requirement introduces a direct financial and administrative burden that is disproportionate to the activity being regulated.

Obtaining a learner driver licence in Queensland currently requires payment of $77.55 for a 3-year learner licence and $28.70 for PrepL, creating a minimum upfront cost of $106.25 before any additional compliance or onboarding costs are taken into account. For individuals seeking flexible or supplementary income, particularly during a period of cost-of-living pressure, this is a material barrier to entry.

The requirement also introduces administrative friction. Completing PrepL, obtaining the necessary identification, and waiting for licence processing can delay the point at which an individual is able to begin earning. For new arrivals, including international students, the process can also involve additional steps such as document translation and identity verification, increasing both cost and complexity further.

3. **Misaligned with broader transport trends**

Driver licence holding is not universal and is declining among younger cohorts. A policy that assumes licence ownership risks embedding inequity into both transport access and economic participation.

Recommendations

1. Remove the licensing requirement and replace it with a targeted, risk-based bike safety framework. If retained, redesign it to minimise barriers through fee relief, streamlined processes and alternative pathways
2. Introduce a clear amnesty period to allow riders to transition to new requirements without loss of income, recognising supply chain constraints.

Infrastructure and Access

Regulatory reform alone will not address the underlying safety risks associated with e-mobility. Evidence from industry and urban planning analysis, including WSP's *Future of Delivery* work, highlights that infrastructure quality and network design are the primary determinants of safety outcomes for micromobility users.

E-bikes are increasingly operating in environments not designed for them, including:

- Congested footpaths shared with pedestrians
- High-traffic roads with limited protection
- Inconsistent or fragmented bike lane networks

This creates conflict between users and increases the likelihood of incidents, regardless of licensing or enforcement settings.

A safety-led approach should therefore be supported by:

- Investment in protected and connected cycling infrastructure, particularly on high-demand delivery corridors
- Clear separation between pedestrians, micromobility users and vehicles, reducing reliance on behavioural enforcement
- Safe kerbside and pickup/drop-off zones, enabling delivery activity without obstructing footpaths
- Consistent local government planning frameworks, avoiding fragmented or conflicting rules across jurisdictions

Without complementary infrastructure and integration planning, stricter regulatory settings risk displacing riders into less safe environments, rather than improving safety outcomes.

Recommendation

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Support regulatory changes with appropriate infrastructure investment and safe integration planning.

Further Commentary on Implementation

Appropriate Allocation of Responsibility

Uber strongly supports the Bill's approach of placing responsibility for compliance on individual riders, supported by enforcement powers and targeted obligations on device sellers.

This reflects the decentralised nature of the e-mobility ecosystem, where devices are privately owned and operated across public spaces.

Maintaining this approach is important. Extending operator-style obligations to delivery platforms would not align with how the sector operates and would introduce complexity, particularly where platforms do not own or control devices.

Recommendation

Maintain responsibility for compliance with e-mobility rules at the individual rider level.

Conclusion

Uber supports the intent of the Bill to improve safety outcomes.

However, delivery riders are a distinct, high-volume cohort operating in a fundamentally different environment to recreational users. The regulatory approach should reflect these differences.

A misaligned framework, particularly one that applies car-based licensing requirements to e-bike riders, risks creating unnecessary barriers to participation. This would reduce earning opportunities, constrain the availability of delivery people, and lead to slower and less reliable service for customers and businesses.

A targeted, risk-based approach would deliver stronger safety outcomes while supporting economic activity and ensuring Queensland communities continue to benefit from efficient, on-demand transport.

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