

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

**Submission No:** 2461

**Submission By:** Lime and Neuron

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10 April 2026

Mr Jim McDonald MP  
Chair of State Development, Infrastructure and Works Committee  
Member for Lockyer  
Queensland Parliament  
Cnr Alice and George Streets  
BRISBANE QLD 4000

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

**Joint Submission by Lime and Neuron Mobility (Neuron)**

Dear Mr McDonald

On behalf of Lime and Neuron, we wish to thank the State Development, Infrastructure and Works Committee (the Committee) for inviting submission regarding the *Transport and Other Legislation (Managing E-mobility Use and Protecting Our Communities) Amendment Bill 2026* (the Bill).

Lime and Neuron operate shared electric micromobility services, including e-scooters and e-bikes, across Queensland in Brisbane, Gold Coast, Bundaberg, Rockhampton, Townsville and Yeppoon. We have operated in Queensland since 2018, supporting millions of trips each year and working closely with local governments to deliver safe, accessible and sustainable transport outcomes for their residents and visitors.

In this submission we recommend amending Clause 34 of the Bill to provide for an exemption for shared schemes, contracted to a local government, to protect Queensland's tourism offering.

Exempting users from holding, at minimum, a Queensland Driver's Learner Licence (Driver's Licence) would see shared operators establish a baseline of identification and education in partnership with the Department of Transport and Main Roads (TMR) and the relevant local government. This requirement for initiatives unique to shared schemes will amount to riders being granted the equivalent to a 'shared e-mobility licence,' and would include:

- Operation in contract with a local government authority and complying with the local requirements including low-speed and no-ride zones, and parking requirements;
- Registration with the shared operator with contact and payment details;
- Valid public, personal and third-party insurance provided by the operator;
- A standardised safety education training module required before their first trip in Queensland and six monthly refreshers.

The current Bill represents a harsh restriction on accessibility that would undermine the economic basis of the shared schemes established by the Brisbane, Gold Coast and other Councils, and without amendment could see the end of services in all Queensland cities.

Our suggested approach would close risks and loopholes present in the existing framework surrounding interstate and overseas visitors as detailed below. Additionally, it would meet the intended outcomes for identity verification and user competency, while acknowledging the difference between privately owned devices and those operating in a shared scheme.

Finally, we would like to bring the Committee's attention to the Bill's proposed section 78C (2), where the onus is on a declaration made by users to comply with the law, and it being reasonable for a shared scheme operator to rely on this. It is our concern that such a declaration may not be a high enough standard for shared providers to continue offering insurance coverage and that insurers could require a full validation of Driver's Licences to ensure riders comply with the law, which as 78C (2) acknowledges, is not practicable (particularly for non-Queensland Driver's Licences).

Without the exemption proposed in this submission, there is a material risk that this Bill could have the unintended consequence of removing insurance currently provided by Lime and Neuron that protects riders and, importantly, members of the community who are currently covered under third party liability insurance.

### **We Support the Government's Objective**

We share the goal of both the Committee and the Queensland Government (the Government): ensuring Queensland has safe, affordable and sensible e-mobility regulation, and that legislation keeps pace with rapid changes in technology and market conditions.

The proliferation of illegal, unregulated private e-mobility devices on Queensland streets is a serious safety concern. Many of these devices are, in practical terms, illegal motorbikes. They operate without speed governors, can be modified to exceed 100 km/h, carry no insurance, are not linked to any identifiable user, and are subject to no maintenance or safety standards. They bear no resemblance to the regulated, speed-limited shared e-bikes and e-scooters that operate under contract with local governments across Queensland.

The Bill's introduction of "prohibited bike" provisions (new Section 6), enhanced police seizure and disposal powers, strengthened drink-driving frameworks, targeted offence regimes with significant penalties, and enforcement against the sale of unregistrable devices to minors are all measures we strongly support.

Getting dangerous, illegal devices off Queensland streets is paramount.

We are also looking forward to working with local governments on improving parking and geo-fenced safety zones.

However, we urge the Committee to ensure the Bill does not apply a blunt instrument that treats fundamentally different categories of device and operator the same way.

The Bill itself already recognises this distinction in several of its own provisions. What is needed is for that recognition to be extended to the licensing requirement under Clause 34.

### *The Bill Already Recognises the Distinction*

The Bill and the Government Response to *Report No. 21* already distinguish between shared schemes and private devices in multiple places:

- Section 48AA empowers authorised officers to require rider information, trip data and telemetry specifically from "shared e-mobility providers," recognising that shared schemes operate within a framework of data, accountability and traceability that private devices do not.
- Section 78C imposes obligations on "e-mobility providers" to ensure users meet age and licensing requirements, with escalating penalties - a framework that only applies to operators, not individual private device owners, precisely because shared operators are identifiable, contractually bound entities.
- The Government Response to Recommendation 18 acknowledges that "local governments already have the ability to work with some shared e-mobility scheme operators to implement measures such as geofencing technology" - a safety mechanism that has no equivalent for private devices.
- The Government Response to Recommendation 3 commits to "exploring ways to enhance data capture and reporting in collaboration with state and national agencies, local governments, and shared e-mobility providers."

The distinction between shared and private is not a new concept being introduced by this submission. It is already embedded in the Bill. Our recommendation is that the Committee extend this established principle to the licensing requirement under Clause 34.

### *Shared Schemes Already Deliver the Outcomes the Bill Seeks*

The Committee's *Report No. 21* and the Government's stated objectives for Clause 34 are to ensure riders have a baseline of identity verification and competency. Shared schemes contracted to local governments already deliver these outcomes - and more.

Under existing contracts with Brisbane City Council, Gold Coast City Council and other local governments, shared operators are required to:

- Register every user with a verified identity (contact and payment details linked to a financial institution);
- Speed-limit all vehicles (typically 25 km/h maximum, with lower limits in designated zones);
- Implement geofencing to enforce no-ride zones, go-slow zones and designated parking areas;
- GPS-track every vehicle in real time and link each trip to an identified, registered user with a unique device identifier;
- Maintain comprehensive insurance covering riders, third parties and the public (exceeding the minimum requirements set by councils);
- Conduct regular fleet maintenance and safety inspections;
- Provide rider education before a user's first trip;
- Share rider data with law enforcement on request, as already established in partnership with the Queensland Police Service under existing Clause 33 powers.

As our evidence to the Committee in July 2025 outlined, shared micromobility has demonstrated strong outcomes: 85% of riders report reduced reliance on personal vehicles, 73% report increased public transport usage, 84% say e-mobility enhances their urban living experience, and 99.99% of shared trips in Queensland are completed without incident.

### **Insurance Risk Under Section 78C(2)**

We draw the Committee's attention to Section 78C(2), which provides a statutory defence where a user has declared they meet the age and licensing requirements and it was reasonable for the provider to rely on that declaration.

The declaration standard may not satisfy insurers. Insurers could require full licence validation - not self-declaration - to maintain coverage for shared operators. As Section 78C(2) itself acknowledges, full validation is not practicable, particularly for non-Queensland licences. This creates a material risk that the Bill would have the unintended consequence of removing the comprehensive insurance currently provided by Lime and Neuron - insurance that protects not only riders but members of the public through third-party liability. No Australian jurisdiction requires private device owners to hold insurance. The removal of shared scheme insurance would therefore leave more, not fewer, Queensland road users uninsured.

A key distinction between private and shared e-scooters is the insurance coverage provided by rental operators. Neuron and Lime both exceed minimum insurance requirements set by councils, ensuring comprehensive protection for riders, third parties, and the broader community in the event of an incident while using a shared device. This includes extensive personal accident insurance automatically provided to all users, as well as third-party and public liability insurance covering personal injury and property damage.

The policy documents are also publicly available on [Neuron's](#) and [Lime's](#) website, ensuring transparency with riders.

The proposed exemption would resolve this issue by removing the licensing obligation from the shared scheme context entirely, preserving the insurance framework that currently protects Queenslanders.

### **Economic Impact**

#### *Tourism*

Queensland has a well-developed tourism market, with 26 million domestic visitors and 1.3 million international visitors in the year to March 2023<sup>1</sup>. The demand in micromobility services is reflected in 2025 usage data, with more than 10,000 shared personal mobility trips per day in Brisbane alone<sup>2</sup>, with 1 in 3 bike-share users being tourists<sup>3</sup>. If Clause 34 is implemented, the requirement for international visitors to hold an equivalent to a Queensland Driver's Licence raises significant tourism issues.

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<sup>1</sup> <https://statements.qld.gov.au/statements/98067#:~:text=Overall%2C%20Queensland%20welcomed%20a%20record,sure%20we%20stay%20on%20top>

<sup>2</sup>

<https://www.brisbane.qld.gov.au/content/dam/brisbanecitycouncil/corpwebsite/about-council/publication-scheme-documents/2025/06/Attachment%20F%20-%20Council%20E2%80%99s%20submission%20to%20the%20State%20Development,%20Infrastructure%20and%20Works%20Committee%20E2%80%99s%20Inquiry.pdf>

<sup>3</sup>

<https://theconversation.com/when-1-in-3-users-are-tourists-that-changes-the-bike-share-equation-for-cities-152895#:~:text=Tourists%20are%20an%20important%20user,and%20public%20transport%20can%20provide>

A substantial proportion of international visitors are unlikely to meet licensing requirements.

This results in excluding some tourists from using shared e-mobility services that are heavily relied upon for short-distance travel. With this Bill, the Government risks placing Queensland at a competitive disadvantage relative to other Australian jurisdictions where micromobility remains readily accessible to visitors.

Evidence demonstrates that shared e-scooters and e-bikes play a meaningful role in enhancing the visitor experience. Research conducted by UQ in Brisbane found that for visitors who used e-scooters, more than 80% indicated that e-scooters enhanced their experience while in Brisbane. The features of e-mobility that supported usage were found to be ease of control, user-friendly technology, familiarity and affordable prices<sup>4</sup>. These services enable tourists to efficiently explore urban areas, support local businesses, and reduce reliance on higher-emission transport options such as taxis. Visitor experience is further enhanced by improving access to dispersed attractions and precincts. We expect minimal use of private devices by international tourists.

The Queensland Government has announced in its *Destination 2045* plan a commitment to making Queensland the events capital of Australia. The plan also states the Government's commitment to attract and host sporting events leading up to and following the 2032 Olympic and Paralympic Games. Shared e-mobility devices experience significant surges during major city events, demonstrating that they are no longer just an alternative transport option, but a major component of event transportation. Without easy access to shared e-mobility, the state risks making transport and city navigation inconvenient, directly burdening tourists and risking Queensland's future legacy as a competitive travel destination.

Furthermore, *Destination 2045* aims to double visitor expenditure to \$84 billion annually and shared e-device schemes significantly boost local economies. Lime rider survey data shows that 65% of riders make a purchase before or after a trip, with a median spend of \$30. This equates to more than \$26 million in economic activity generated across Brisbane and the Gold Coast in 2025 on Lime vehicles alone. Restricting access to shared micromobility would therefore not only reduce transport choice for visitors, but also significantly diminish associated spending, contradicting the Government's own commitment to growing visitor expenditure.

### *Brisbane 2032 Olympic and Paralympic Games*

The Brisbane 2032 Olympic and Paralympic Games are expected to attract an additional 500,000 visitors<sup>5</sup> over and above what we see every year, and will require a substantial expansion of transport capacity. Large scale events rely on efficient short-distance transport to move spectators between venues, accommodation and transit hubs, driving significant increase in public transport demand.

International Olympic host cities, including Paris and Los Angeles, have integrated micromobility into event transport strategies to support low-emissions and active transport goals. Shared e-mobility has proven valuable in facilitating visitors' movement between

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<sup>4</sup> <https://business.uq.edu.au/article/2023/08/e-scooters-pave-way-memorable-brisbane-tourism-experience>

<sup>5</sup>

<https://www.couriermail.com.au/news/opinion/opinion-how-do-we-entertain-brisbane-2032-games-visitors/news-story/efc2e48e1b88cbe745743011433ecef#:-:~:text=It's%20vital%20we%20shape%20the,we%20want%20them%20to%20have.>

event locations in Queensland cities already, such as on major game days at Suncorp Stadium and the Gabba.

Requiring a Driver's Licence would exclude many international spectators, volunteers and visitors from using shared e-scooters and e-bikes.

This would reduce micromobility uptake during the Games and shift additional demand onto already constrained public transport, taxi and rideshare networks. Evidence indicates that 28% of shared e-scooter users would otherwise have used public transport<sup>6</sup>, meaning reduced access will directly increase pressure on the network and increase burden on the tax payer. This risk would be exacerbated if operators such as Lime and Neuron reduce or withdraw services due to declining usage under the proposed Bill.

### *International Licence requirements and trends*

Introducing the proposed requirements risks making Queensland cities less accessible and less visitor-friendly compared with other international destinations.

For example, in 2025, over 1 million Chinese visitors came to Australia<sup>7</sup>, with only about half of the population holding a licence<sup>8</sup>. Similarly, about one third of the US population<sup>9</sup>, and 26% of the UK population do not hold a licence.<sup>10</sup> Furthermore, many countries are seeing a decline in the licensing among young adults with only about 61% of 18 year olds in the US holding a licence in 2018 compared to 80% in 1983<sup>11</sup>.

These trends indicate that a substantial proportion of potential visitors would be excluded from legally using shared micromobility devices if a licensing requirement were introduced. Consequently, this risks both the accessibility and competitiveness of Queensland's tourism offering.

### **Licence Recognition and Road Rule Familiarity**

We note the Committee's Recommendation 13 originally proposed that riders complete the Queensland PrepL driver training program. The Bill departed from this by accepting any valid licence - including overseas and interstate licences - of any type or class.

While some international tourists may hold valid overseas driver licences, this does not equate to the outcomes sought by the Committee and the Government to ensure a level of competency with the Queensland Road Rules and specific e-mobility rules in Queensland.

An overseas licence reflects proficiency in a different regulatory environment, not an understanding of Queensland conditions. This issue also applies domestically. There are material differences between Australian states—for example, e-scooters are permitted on footpaths in Queensland, while privately owned devices are generally prohibited on public

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<sup>6</sup> [https://australasiantransportresearchforum.org.au/wp-content/uploads/2025/02/ATRF2024\\_Resubmission\\_39.pdf](https://australasiantransportresearchforum.org.au/wp-content/uploads/2025/02/ATRF2024_Resubmission_39.pdf)

<sup>7</sup> <https://www.tourism.australia.com/en/insights/markets/china/market-insights-snapshot.html#:~:text=Market%20trends,growing%20by%2022%20per%20cent>

<sup>8</sup>

<https://global.chinadaily.com.cn/a/202212/08/WS6391f96ea31057c47eba3718.html#:~:text=Currently%2C%20one%20in%20two%20Chinese,of%20more%20than%2013%20million>

<sup>9</sup> <https://yaleclimateconnections.org/2025/01/american-transportation-revolves-around-cars-many-americans-dont-drive/>

<sup>10</sup> <https://www.ethnicity-facts-figures.service.gov.uk/culture-and-community/transport/driving-licences/latest/>

<sup>11</sup> <https://www.deseret.com/u-s-world/2023/2/22/23610158/less-teens-are-driving-today/>

roads and paths in New South Wales and Victoria. Licence status of any kind does not ensure familiarity with Queensland-specific rules.

Accordingly, relying on licence recognition creates a regulatory loophole: it permits access for users who may not understand local rules, while excluding others who could safely comply. Licence status is a poor proxy for rule comprehension and does not effectively address safety outcomes.

A mandatory, TMR-approved education module delivered through shared operator platforms would more effectively achieve the Committee's intended outcome - ensuring every rider understands Queensland rules before their first trip, regardless of where they are from.

### **Accessibility and Public Transport Integration**

Micromobility services have increasingly become an important part of the urban transport ecosystem, complementing traditional public transport. Rental e-bikes and e-scooters connect riders to public transport systems enabling more people to use buses, trains and other services.

These services are particularly valuable for low-income communities, who may be unable to afford costs associated with obtaining a Driver's Licence and owning a vehicle, these include students and younger Queenslanders who may not own a car or hold a Driver's Licence. This also applied for older people who have given up their Driver's Licence for legitimate reasons such as cost.

For many in disadvantaged communities, shared e-bikes and e-scooters are a primary or supplementary mode of transportation for commuting to work, education, healthcare, or essential services. The average across Queensland cities shows that approximately 49% of Neuron trips are directly replacing a car journey. Imposing a licensing requirement would disproportionately affect these groups, exacerbating social inequalities and limiting mobility independence. Shared micromobility also provides an affordable mobility option for shift workers and people travelling at night when public transport is often limited.

Micromobility also plays an important accessibility role for people with disabilities or mobility impairments, who may not hold a driver's licence. Neuron's research shows that approximately 5% of riders identify as having a disability or mobility impairment, including conditions such as chronic joint pain, scoliosis and multiple sclerosis. These users are also more reliant on shared e-scooters, with 44% using them for errands compared to 28% of average riders. For those with a disability or mobility impairment, shared devices provide a convenient transport option that allows them to make trips they might otherwise be unable to undertake.

### **Device Safety and Regulation**

Lime and Neuron support stronger regulation for privately owned high-powered e-mobility devices, including licensing requirements. Many privately owned devices operate without speed governors and can be modified to exceed legal speed limits, creating additional safety risks. However, shared micromobility services operate very differently.

Our e-mobility schemes are highly regulated and incorporate significant safety technology that is not available on privately owned devices. Rental e-bikes and e-scooters are GPS-tracked, speed-limited, and managed through geofencing technology that enables slow zones, no-ride areas and designated parking zones. Our devices all have unique identifying numbers and are linked to user accounts.

Operators also conduct regular maintenance and safety checks, provide rider education, and maintain insurance coverage for riders and third parties. Evidence collected by Neuron shows that the vast majority of shared e-mobility trips end safely, with over 99.99% of trips in Queensland completed without incident.

To further strengthen accountability and support victim recourse, Lime and Neuron support enhanced data-sharing mechanisms with the Government. This includes the collection of user information (such as contact information and valid payment method details) and support for Clause 33, which requires shared e-mobility providers to supply rider information to law enforcement where offences have occurred. This process is already in place in partnership with the Queensland Police Service, and both providers have consistently complied with such requests.

#### *Preserving Flexibility for Innovation*

E-mobility technology is evolving rapidly. We ask the Committee to consider enabling TMR to provide regulatory flexibility for innovative shared vehicles operating under local government contracts, where those vehicles are covered by insurance and comply with relevant Australian Standards (AS) and UL safety specifications.

We note the Bill already contemplates this approach: the EPAC definition in Schedule 4 includes provision for a "special circumstances permit" to waive the EPAC standard compliance and labelling requirements. Extending this principle to shared schemes contracted to local governments would ensure the latest safety innovations - including improved geofencing, parking compliance technology, footpath detection and rider behaviour monitoring - can be deployed as they become available. Local governments retain direct oversight through their contractual arrangements and can adjust operational requirements accordingly.

Regulatory settings should provide a framework that keeps pace with innovation, rather than locking the state into a static set of requirements that may not reflect best practice within the term of a single permit or contract.

#### **Recommendation**

We ask the Committee to consider the following amendment to the Bill:

- Amend Clause 34 (new Section 78B) to exempt users of shared e-mobility services that operate under contract with a local government from the requirement to hold a valid Driver's Licence.
- In place of a Driver's Licence requirement for shared scheme users, establish a the equivalent of "shared e-mobility licence" framework requiring:
  - (a) User registration with verified identity (full name, contact details and payment method);

- (b) Operator-delivered, TMR-approved safety education before first use, with six-monthly refreshers;
- (c) Comprehensive insurance coverage provided by the operator, incorporating public, personal and third-party insurance; and
- (d) Operation under contract with a local government, including compliance with geofencing, parking and operational requirements.

## Conclusion

Overall, Lime and Neuron agree with the Government's assessment that privately owned high-powered e-mobility devices can pose significant risks to public safety, particularly where they operate outside appropriate regulatory and technical controls.

Shared micromobility is fundamentally different. It operates within a controlled, contracted and accountable framework that already delivers the identification, competency and safety outcomes the Bill seeks. This is not a hypothetical claim - it is demonstrated by eight years of operation across six Queensland cities, millions of trips, and a safety record of over 99.99% of trips completed without incident.

Clause 34 creates a structural barrier to access for lower-income, disabled and transport-disadvantaged populations who rely on micromobility as a safe, low-cost transport option, as well as impacts to our visitor economy, with tourists likely to use shared devices not private ones.

Our recommendation preserves the Bill's core objective of regulating dangerous private devices and improving public safety. They extend the distinction between shared and private devices that the Bill already recognises. They also ensure shared schemes - which are already regulated, insured, contracted and accountable - can continue to provide safe, accessible and affordable transport for Queenslanders and visitors.

Lime and Neuron remain committed to working constructively with all levels of government to support improved safety outcomes, compliance, and enforcement, while ensuring regulatory settings continue to support mobility, accessibility, and tourism participation.

Please do not hesitate to contact us via the details below should you require any further information.

We thank the Committee for its consideration.

Kind regards,

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*Jayden Bryant*

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