



E-Bike Position Statement

Who are we?

BikeSA is South Australia's peak body for cycling, working to support, encourage and advocate for more people riding bikes across the state. Our work spans cycling advocacy, education, community programs, recreational riding and events, with a focus on making cycling safer, more accessible and more attractive for everyone.

Our organisation is strengthened by a dedicated community of volunteers, whose contribution enables us to deliver programs, events and cycling experiences across metropolitan and regional South Australia.

BikeSA has also seen a strong and continuing increase in the uptake of e-bikes across our rides, tours and events, including among our volunteer community. This reflects the growing role e-bikes are playing in enabling people to continue riding, ride further and participate in cycling activities that may otherwise be less accessible to them.

More broadly, BikeSA recognises cycling and e-bikes as an important accessible, low-impact and affordable transport option. E-bikes can help reduce barriers associated with distance, hills, fitness and age, while providing a practical alternative to the car for many everyday journeys.

This direct connection with riders and volunteers gives BikeSA valuable insight into both the benefits of e-bike participation and the practical considerations around their safe use.

1—Purpose

This position paper sets out BikeSA's position on the regulation and use of electric power-assisted bicycles in South Australia.

It responds to the South Australian Government's review of the e-bike regulatory framework and provides BikeSA's position on the definition of legal e-bikes, product standards, rider requirements, speed management, infrastructure, enforcement and the treatment of non-compliant devices.

It also recognises the distinct role and regulatory needs of purpose-built e-cargo cycles.

2—National Regulatory Context

BikeSA recognises that e-bike regulation is evolving at both the national and state level.

Australia recognises an Electrically Power-Assisted Cycle (EPAC) category, broadly based on the European pedelec framework. An EPAC provides pedal assistance through a motor with a maximum continuous rated power of 250 watts, with assistance progressively reduced and cut off by 25 km/h.

South Australia currently permits compliant power-assisted bicycles, including EPACs, to be treated as bicycles. This means compliant e-bikes do not require vehicle registration, a driver licence or compulsory motor vehicle insurance.

On 6 August 2026, the Australian Government announced that the Australian Competition and Consumer Commission (ACCC) had been directed to develop a nationally consistent safety standard for e-bikes and other e-micromobility devices under Australian Consumer Law.¹ The announcement also noted the adoption of EN 15194 by Australian Transport Ministers as guidance for e-bikes considered appropriate for use on Australian roads.

BikeSA supports greater national consistency and, as South Australia reviews its e-bike regulatory settings, supports alignment with nationally agreed standards and definitions where practicable. Regulation should remain proportionate to risk while recognising the important role of compliant e-bikes as an accessible, low-impact and affordable form of transport and recreation.

¹ 1. Australian Government, *Stronger product safety standards for e-bikes*, Joint Media Release, 6 August 2026.

3—Position

BikeSA supports safe, legal e-bike use.

E-bikes enable more people to ride and have an important role in South Australia's transport and recreation future. Legal e-bikes should continue to be treated as bicycles and their riders should not be subject to unnecessary motor vehicle-style regulation.

BikeSA supports clear product standards, responsible riding and effective action against dangerous behaviour. We also support safer cycling infrastructure and stronger consumer information. Cycling (including use of safe, legal e-bikes) is an important contributor to health, economic, environmental and social outcomes in our community and we support the development of policy that encourages the safe use of bicycles as a form of active travel.

High-powered electric vehicles that do not meet the legal definition of an e-bike should not be conflated with legal e-bikes. Regulation and enforcement should focus on the devices and behaviours that create the greatest risk without unnecessarily restricting responsible riders.

4—Context

Compliant e-bikes have been permitted in South Australia since 2014 and are currently regulated as bicycles. The South Australian Government is reviewing whether the framework should change, including possible adoption of European Standard EN15194, minimum age requirements and specific speed limits on footpaths or shared paths. The review is also considering community education, infrastructure investment, stronger enforcement and the treatment of illegal high-powered devices.

BikeSA recognises legitimate community concerns about dangerous riding and the increasing presence of high-powered electric vehicles on public roads and paths. However, the regulatory response must distinguish between:

- a) compliant e-bikes.
- b) riders who engage in unsafe behaviour; and
- c) high-powered devices that are not legally bicycles. (whether as purchased or modified by the user).

The South Australian crash data presently available does not make that distinction. Between 2020 and 2024, 57 casualty crashes were reported as involving an e-bike, but the Department expressly notes that the data does not distinguish compliant e-bikes from non-compliant devices.²

Recent Australian experience reinforces the need for a careful approach. Queensland's parliamentary inquiry proposed sweeping restrictions including a 16-year minimum age and a requirement to hold a learner driver's licence, attracting criticism that legal e-bikes were being swept into a regulatory response to much broader e-mobility harms. Queensland has since also strengthened action against illegal devices and dangerous behaviour.

BikeSA's position is that South Australia should take a risk-based, proportionate approach to the problem rather than impose broad restrictions on all people who use electric assistance to ride a bicycle. This balances the benefits of encouraging active travel with the need to provide safe roads and infrastructure for all users. We recommend basing this on principles, as discussed in the following sections.

² Department for Infrastructure and Transport, *E-bikes (Power Assisted Bicycles) in South Australia* (Discussion Paper, Government of South Australia, June 2026). Available online.

5—Principles

BikeSA's position is guided by the following principles.

- 5.1 Legal e-bikes are bicycles** A compliant e-bike remains fundamentally a bicycle. It should not become a motor vehicle merely because its rider receives limited electrical assistance.
- 5.2 Safety regulation should be proportionate** Rules should respond to demonstrated risks and should not unnecessarily restrict participation, mobility or access to cycling.
- 5.3 Regulation should distinguish legal e-bikes from illegal vehicles** High-powered electric motorcycles should not be described or regulated as though they are ordinary e-bikes.
- 5.4 People should not be punished for the conduct of others** Responsible riders of legal e-bikes should not bear the regulatory burden created by deliberately modified devices or dangerous behaviour.
- 5.5 Education is essential to safe e-bike use** Clear and accessible education should help riders, retailers and the broader community understand e-bike laws, safe riding practices and the differences between compliant e-bikes and non-compliant electric vehicles.
- 5.6 Safe infrastructure is fundamental** Education and enforcement have a role, but regulation cannot substitute for providing safe and appropriate places for people to ride.

6—Detailed Position

6.1. Compliant e-bikes should continue to be treated as bicycles

6.1.1. Position

BikeSA supports the continued treatment of compliant e-bikes as bicycles.

6.1.2. Rationale

E-bikes do not create an entirely new transport mode. They extend the practical use of cycling to people who may otherwise find distance, gradients or physical exertion a barrier, encouraging healthy communities and environmental sustainability.

Compliant e-bikes should continue to have the same general road and path access as conventional bicycles and should remain outside motor vehicle registration and licensing frameworks.

The South Australian Government recognises that compliant e-bikes can make cycling more accessible, support independent mobility and reduce car dependence.

Treating legal e-bikes as motor vehicles would undermine those benefits. It would also place significant new barriers in front of people who use an e-bike precisely because driving is unsuitable or unavailable to them.

The key characteristic of a compliant e-bike should remain that the motor assists cycling rather than replaces it.

6.2. Clear distinction between legal e-bikes and illegal electric vehicles

6.2.1. Position

BikeSA supports a clear and consistent distinction between compliant e-bikes and non-compliant electric vehicles.

Where a device is effectively an unregistered electric motorcycle, government, police and media communications should describe it accordingly rather than simply calling it an "e-bike".

BikeSA's position is straightforward: the misuse of illegal electric motorcycles should not be used to justify unnecessary restrictions on legal bicycles.

6.2.2. Rationale

South Australian law already distinguishes compliant pedal-assisted bicycles from high-powered, throttle-controlled and illegally modified devices.

The generic use of the term "e-bike" obscures that distinction. It can allow incidents involving powerful illegal devices to drive restrictions on people using ordinary compliant bicycles.

The physical appearance of a device should not determine its legal status. An unusual frame, wide tyres or a cargo configuration does not make a bike illegal. The relevant factors should be its certified specifications and operating characteristics as outlined in the European Standard EN15194.

6.3. Adoption of European Standard EN15194

6.3.1. Position

BikeSA supports EN15194 as the principal standard for ordinary e-bikes supplied for use in South Australia but does not support making it the sole legal pathway unless appropriate provisions are made for existing lawful bikes, adapted cycles and e-cargo cycles.

6.3.2. Rationale

The European regulatory model limits ordinary pedal-assisted cycles to 250 watts maximum continuous rated power and requires assistance to be progressively reduced and cut off before 25 km/h.

The South Australian discussion paper notes that EN15194 also contains requirements relating to brakes, structural strength, electrical systems, batteries and tamper resistance.

Adoption would provide significant benefits through clearer product standards and easier identification of compliant devices. It would also improve national consistency following the Commonwealth's reinstatement of the standard for relevant imports in December 2025.

However, exclusive adoption without transitional arrangements could render previously lawful devices non-compliant and create difficulties for specialist cycles.

BikeSA therefore supports:

Grandfathering existing lawful devices. A person who purchased a legal PAPC should not lose the right to use it because the regulatory standard later changes.

A permanent compliance label. New bikes should clearly display their applicable standard, continuous rated power and assisted-speed cut-off.

An alternative pathway for specialist cycles. Adapted cycles and other legitimate configurations should be able to demonstrate equivalent safety.

A separate pathway for e-cargo cycles. The ordinary 250-watt category should not be the only legal pathway for every form of electrically assisted cycle. This is discussed further below.

6.4. E-cargo cycles

6.4.1. Position

BikeSA supports the creation of a distinct legal category for purpose-built e-cargo cycles.

A compliant light e-cargo cycle should be permitted to have:

- a) up to 500 watts maximum continuous rated power;
- b) motor assistance only to 25 km/h;
- c) pedal assistance as the primary form of propulsion above walking speed;
- d) permanent compliance and load-rating information; and
- e) appropriate cargo-specific structural and safety certification.
- f) A compliant light e-cargo cycle should continue to be treated as a bicycle and should not require registration or a driver licence.
- g) EN15194-compliant e-cargo bikes should remain fully legal. The higher-powered category should be an additional pathway, not a requirement for all cargo bikes.

A compliant light e-cargo cycle should continue to be treated as a bicycle and should not require registration or a driver licence.

EN15194-compliant e-cargo bikes should remain fully legal. The higher-powered category should be an additional pathway, not a requirement for all cargo bikes.

6.4.2. Rationale

E-cargo cycles have a different functional purpose from ordinary e-bikes. Their role is to carry substantial loads or passengers, often as an alternative to a car or commercial vehicle.

The current South Australian framework already recognises an e-cargo bike as an example of a compliant e-bike. The question is therefore not whether cargo bikes should be allowed. It is whether the regulatory framework properly accommodates their full potential.

The European threshold is expressed as *maximum continuous rated power*, which is not the same as an absolute instantaneous output cap. A well-designed 250-watt system may therefore be entirely suitable for many family and urban cargo applications.

However, heavier cycles create a legitimate case for additional sustained assistance.

As an illustration, a combined rider, cycle and load weighing 200 kg requires approximately 270 watts merely to overcome gravity while travelling at 10 km/h up a 5 per cent grade. A 250 kg combination on an 8 per cent grade requires approximately 545 watts before rolling resistance and drivetrain losses are considered.

The case for additional power is therefore strongest when it enables a heavily loaded cycle to:

- a) start safely.
- b) maintain stability on gradients.
- c) carry children or substantial cargo; or
- d) replace a trip that would otherwise be made by motor vehicle.

It is not a case for higher assisted speed.

6.4.3. Why 500 watts?

A 500 watts maximum continuous rated power for the light e-cargo category would provide a meaningful increase in load-carrying capability while maintaining the defining characteristics of a bicycle.

The 25 km/h assistance cut-off should remain unchanged. The higher power should be used to move greater mass, not to create a faster vehicle.

A general increase to 500 watts for all e-bikes would be harder to justify. A targeted cargo category provides a stronger connection between the additional power and the transport task that requires it.

6.4.4. Preventing misuse of the category

The category must not become a loophole through which an otherwise non-compliant or high-powered e-bike can qualify as an e-cargo cycle simply through the addition of a basket, rack or other cargo-carrying accessory.

To qualify as an e-cargo cycle, a bicycle should meet a defined set of technical and safety criteria demonstrating that it is suitable for the carriage of substantial cargo or passengers. These requirements should apply regardless of whether the cycle is commercially manufactured, custom-built or modified.

The final technical criteria should be developed in consultation with the bicycle industry and relevant safety experts and should address:

- a) braking performance at maximum load.
- b) frame and component strength.
- c) electrical and battery safety.
- d) stability and handling.
- e) secure passenger and load carrying; and
- f) tamper resistance.

6.4.5. Heavy commercial cargo cycles

BikeSA also supports further investigation of a separate pathway for heavier commercial cargo cycles that fall outside the light e-cargo category.

These vehicles may require greater power and stronger safety standards. They should not automatically receive all of the access rights of an ordinary bicycle, but nor should innovative low-emission freight vehicles be forced into an unsuitable regulatory framework simply because the law recognises only a 250-watt bicycle and a motorcycle.

BikeSA supports further national work on this category rather than attempting to specify a complete regulatory framework through the current South Australian review.

6.5. Power and assisted speed for ordinary e-bikes

6.5.1. Position

BikeSA supports retaining the 250-watt continuous rated power threshold and 25 km/h assistance cut-off for ordinary e-bikes.

The e-cargo cycle category recommended above should be the targeted exception.

6.5.2. Rationale

A 25 km/h assistance cut-off preserves a clear distinction between an assisted bicycle and a motor vehicle.

It is important that public communication correctly describe this as an assistance cut-off, not a universal maximum speed. A rider may travel faster through their own physical effort where the applicable road and path rules permit it.

BikeSA does not presently support increasing assisted speed to 35 or 45 km/h. Doing so would materially change the interaction between legal e-bikes, other cyclists and pedestrians, and would weaken the basis for continuing to treat them as ordinary bicycles.

The stronger policy opportunity lies in making cycling more practical through appropriate assistance, including the e-cargo cycle carve-out, rather than making electrically assisted bicycles faster.

6.6. Registration, driver licensing and compulsory insurance

6.6.1. Position

BikeSA opposes registration, driver licensing and compulsory motor vehicle insurance for compliant e-bikes and light e-cargo cycles.

A South Australian Class C learner permit should not be a condition of riding a legal e-bike.

6.6.2. Rationale

A driver licence tests eligibility to operate a motor vehicle. It is not an appropriate qualification for cycling.

Requiring one would create a direct barrier for some of the people who benefit most from e-bikes, including young people, some people with disability and people who do not drive.

The present South Australian framework does not require a driver licence, vehicle registration or compulsory third-party motor vehicle insurance for compliant e-bikes. BikeSA sees no evidence-based reason to reverse that approach. BikeSA supports rider education and encourages cyclists to consider appropriate personal and third-party insurance. That is different from requiring every legal bicycle to enter a motor vehicle-style system.

BikeSA believes a person should not have to qualify as a motor vehicle driver before they can ride a legal bicycle.

6.7. Minimum age requirements

6.7.1. Position

BikeSA does not support a blanket minimum age of 16 for riding a compliant e-bike and strongly opposes requiring young riders to hold a driver licence.

BikeSA's preferred position is that no new minimum age should be introduced without clear evidence that the age of riders using compliant e-bikes is a material cause of serious harm.

Should government determine that an age framework is necessary, BikeSA supports riders aged 12 years and over being permitted to ride independently, with younger riders permitted under direct adult supervision.

Appropriate exemptions should apply where an adapted e-bike is used for genuine disability or mobility needs.

6.7.2. Rationale

South Australia's available crash data does not presently provide a reliable distinction between compliant e-bikes and higher-powered or non-compliant electric vehicles, including electric motorcycles that may be reported or described as e-bikes. It therefore provides a weak foundation for concluding that children riding compliant 250-watt e-bikes present a level of risk that warrants a blanket age restriction.

E-bikes can provide younger people with independent access to education, work and community activities. A blanket 16-year minimum would remove that option regardless of the rider's competence, the type of e-bike being used or the circumstances in which it is ridden.

Queensland's recent proposal for a blanket 16-year minimum and learner licence demonstrates the risk of combining compliant e-bikes and other electric devices within a single regulatory response.

Bike SA accepts that very young children riding unsupervised raise different considerations from teenagers using a compliant e-bike for transport. A supervision-based model addresses that distinction more proportionately than a blanket prohibition.

6.8. Speed management on footpaths and shared paths

6.8.1. Position

BikeSA supports context-appropriate speed management but opposes e-bike-specific speed limits where a conventional bicycle travelling at the same speed presents substantially the same risk.

6.8.1.1. Footpaths

BikeSA supports the following approach.

BikeSA supports a 15 km/h default maximum speed for all bicycles and compliant e-bikes on ordinary footpaths.

Lower limits may be applied in identified high-pedestrian areas where justified by local conditions.

6.8.1.2. Shared paths

BikeSA does not support a blanket 10 km/h limit for compliant e-bikes on shared paths.

The existing obligation to give way to pedestrians and ride safely should remain central. Lower signed limits may be imposed at specific high-conflict locations based on evidence and local conditions.

6.8.1.3. Bicycle paths and separated cycling infrastructure

BikeSA does not support a special e-bike speed limit on infrastructure intended principally for cycling.

6.8.2. Rationale

The current regulatory arrangement is difficult to justify. A compliant e-bike on a footpath is presently subject to the speed limit of the adjacent road, while shared-use paths have no specific numeric speed limit.

A specific footpath rule is therefore reasonable because footpaths are primarily pedestrian environments. However, the source of risk in an interaction with a pedestrian is principally the speed and manner of travel, not whether the bicycle's rider receives electrical assistance.

Shared-use paths require a different consideration. They form an important part of South Australia's cycling network and, in many locations, provide people riding bicycles with an alternative to travelling alongside higher-speed motor traffic. Any speed framework should allow shared-use paths to continue to function effectively for cycling while recognising that people riding must adjust their speed and behaviour around pedestrians and other vulnerable path users.

This should not imply that bicycles do not belong on roads. Bicycles are legitimate road vehicles, and people riding should continue to have safe and practical access to the road network. However, where appropriate, dedicated cycling infrastructure separated from both motor vehicles and pedestrians provides the best environment for reducing conflict between different transport users.

South Australia does not yet have a sufficiently connected network of dedicated cycling infrastructure to provide this option for all journeys. Shared-use paths and roads will therefore continue to play an important role in enabling people to cycle for transport and recreation.

A rule allowing a conventional bicycle to travel at a speed prohibited for an otherwise equivalent e-bike would be difficult to justify on safety grounds and difficult to enforce. Speed rules should respond to the environment, the presence of vulnerable users and rider behaviour, rather than the bicycle's power source.

Bike SA will continue to advocate for proportionate and evidence-based speed management alongside increased investment in safe, connected and dedicated cycling infrastructure.

6.9. Education and rider capability

6.9.1. Position

BikeSA strongly supports sustained community education as a central part of the e-bike safety framework, particularly as part of the state education curriculum.

Education should be directed not only at riders, but also at parents and purchasers.

6.9.2. Rationale

There is substantial confusion about what constitutes a legal e-bike, where different devices may be used and what modifications make a device illegal.

New regulation will have limited effect if people do not understand it.

Education should clearly explain:

- a) how to identify a compliant e-bike.
- b) the difference between pedal assistance and throttle propulsion.
- c) where different devices may be used.
- d) safe interaction with pedestrians.
- e) helmet and equipment requirements; and
- f) the consequences of tampering.

BikeSA is well placed to contribute expertise and community reach to this work. Any significant delivery role should be appropriately funded and delivered in partnership with government.

6.10. Infrastructure investment

6.10.1 Position

BikeSA considers increased investment in safe cycling infrastructure to be an essential part of the response to growing e-bike use.

New regulation should not be treated as a substitute for safe places to ride.

6.10.2. Rationale

The Government's discussion paper itself identifies infrastructure investment as one of the potential measures to improve safety.

New regulation should not be treated as a substitute for safe places to ride.

E-bikes allow a wider range of people to cycle and make longer trips practical. That should increase the case for a connected and well-designed cycling network.

Conflict is more likely where people riding at different speeds are forced into narrow spaces or must choose between busy roads and pedestrian-dominated footpaths.

BikeSA therefore supports greater investment in separated cycling infrastructure and the removal of network gaps that force inappropriate mixing of transport modes.

Where repeated conflict occurs between riders and pedestrians, government should consider whether the infrastructure is adequate before assuming the answer is simply another restriction or fine.

6.10.2. BikeSA's Role

BikeSA will continue to advocate for increased investment in safe, connected and accessible cycling infrastructure that supports people of all ages and abilities to ride with confidence.

BikeSA will continue to work collaboratively with Government, local councils, planners and infrastructure providers to identify network gaps, improve route connectivity and advocate for infrastructure that safely accommodates the growing diversity of bicycle users, including people riding conventional bicycles, compliant e-bikes and e-cargo cycles.

BikeSA will continue to contribute its technical expertise, operational experience and community knowledge to the planning, design and evaluation of cycling infrastructure, supporting solutions that reduce conflicts between riders, pedestrians and motor vehicles through good design rather than unnecessary regulatory restrictions.

BikeSA will continue to advocate for evidence-based investment that prioritises separated cycling infrastructure, safer crossings, improved wayfinding and high-quality network connections. BikeSA considers investment in safe cycling infrastructure to be fundamental to improving safety, increasing participation and supporting healthier, more sustainable communities.

6.11. Enforcement and penalties

6.11.1. Position

BikeSA supports stronger and more effective enforcement where it is targeted at dangerous behaviour, deliberate tampering and illegal devices.

Penalties should be proportionate to the conduct and risk involved.

6.11.2. Rationale

BikeSA does not oppose enforcement merely because the person involved is riding a bicycle.

Serious and deliberate conduct should attract serious consequences. This includes the use of high-powered illegal devices on public paths and repeated dangerous riding.

However, the regulatory framework should distinguish between:

- a) minor or inadvertent non-compliance.
- b) a product sold to a consumer on the false understanding that it was legal;
- c) deliberate modification of a compliant bike; and
- d) dangerous or repeated antisocial behaviour.

Warnings and education may be appropriate for low-level first offences. Deliberate tampering and serious dangerous behaviour justify a stronger response.

Enforcement should be based on objective evidence of a device's operating characteristics, not its appearance.

6.12. Point-of-sale information and seller responsibility

6.12.1. Position

BikeSA strongly supports mandatory point-of-sale information and greater responsibility for businesses that import, advertise and sell electric devices.

6.12.2. Rationale

A consumer should not need specialist technical or legal knowledge to determine whether a product being sold to them is legal to use.

Every electric cycle or similar device offered for sale should clearly state:

- a) whether it is legal on South Australian public roads and paths.
- b) its maximum continuous rated power.
- c) its assisted speed cut-off.
- d) how any throttle operates.
- e) the applicable compliance standard; and
- f) any restrictions on where it may be used.

This information should appear prominently in physical stores and online listings.

A device intended only for private property should carry an unavoidable warning that it cannot legally be ridden on public roads or paths.

It should be an offence to falsely represent an illegal device as a road-legal e-bike.

Responsibility for compliance should not rest only with the person at the end of the supply chain. Importers and sellers who place non-compliant devices into the community must also be accountable.

6.13. Treatment of non-compliant high-powered devices

6.13.1. Position

BikeSA supports the continued prohibition of non-compliant high-powered devices on footpaths, shared paths and bicycle infrastructure.

6.13.2. Rationale

Some devices marketed as e-bikes have motor outputs and operating characteristics substantially beyond those of a bicycle. The South Australian discussion paper identifies devices capable of 45 or 50 km/h as examples of non-compliant vehicles.

Such a device should be permitted on public roads only where it independently satisfies the requirements of an appropriate motor vehicle class.

Where a vehicle is functionally an electric motorcycle, BikeSA supports requiring it to comply with the safety, licensing and insurance requirements of that vehicle class.

BikeSA does not support creating a simplified legal category that allows high-powered motorcycles onto bicycle paths merely because pedals have been fitted.

This position protects pedestrians and compliant e-bike users. It also protects conventional cyclists who share bicycle infrastructure with these devices.

6.14. Seizure and destruction powers

6.14.1. Position

BikeSA supports strengthened police powers to seize clearly non-compliant devices used illegally in public places, subject to objective testing and procedural safeguards.

Destruction should be available for serious, deliberate or repeated non-compliance.

6.14.2. Rationale

South Australia Police can currently seize and impound non-compliant devices in some circumstances but generally cannot destroy them without a court order.

A device that is deliberately configured as an illegal high-powered motor vehicle and repeatedly used in public may warrant permanent removal.

However, irreversible destruction requires safeguards.

The owner should receive notice of the basis for the decision and should have an appropriate opportunity for review before a device is destroyed.

The framework should distinguish serious deliberate non-compliance from a minor defect that can genuinely be rectified.

6.15. Drug and alcohol testing

6.15.1. Position

BikeSA supports targeted drug and alcohol testing powers where there is reasonable suspicion of impairment or following a serious collision.

BikeSA does not support automatically importing the entire motor vehicle random-testing framework for riders of compliant e-bikes.

6.15.2. Rationale

It is already an offence to ride a compliant e-bike while under the influence of alcohol or drugs. The discussion paper notes that police presently rely on observed impairment because compliant e-bikes are vehicles but not motor vehicles.

There is a legitimate case for providing police with better tools to investigate serious incidents and clear impairment.

The response should remain proportionate to the legal status of the vehicle.

A compliant e-bike rider should not automatically be treated in every respect as the driver of a motor vehicle.

6.16. Data and evidence

6.16.1. Position

BikeSA strongly supports improved collection and reporting of e-bike crash and injury data before further broad restrictions are imposed.

6.16.2. Rationale

The present data combines compliant e-bikes with non-compliant devices. It therefore cannot reliably demonstrate which vehicle types or behaviours are driving the reported increase in incidents.

Future data collection should distinguish:

- a) compliant e-bikes;
- b) suspected non-compliant devices;
- c) conventional bicycles;
- d) e-cargo cycles;
- e) PMDs; and
- f) electric motorcycles.

It should also record rider age and infrastructure type, together with relevant contributing factors such as impairment, excessive speed or illegal modification.

Good regulation requires data that distinguishes the thing being regulated from a fundamentally different vehicle

7—Priority Recommendations

7.1. Priority 1: Protect the legal status of compliant e-bikes

Compliant e-bikes should remain bicycles. No driver licence or vehicle registration should be required.

7.2. Priority 2: Adopt clear standards without restricting compliant e-bike use

Support EN15194 as the primary ordinary e-bike standard, with grandfathering and alternative pathways for adapted cycles.

7.3. Priority 3: Create a fit-for-purpose e-cargo cycle category

Permit purpose-built light e-cargo cycles up to 500 watts maximum continuous rated power while retaining the 25 km/h assistance cut-off.

7.4. Priority 4: Target the actual source of risk

Focus enforcement on dangerous conduct, deliberate tampering and illegal high-powered vehicles.

7.5. Priority 5: Regulate the supply chain

Require clear point-of-sale information and hold importers and sellers accountable for misleading claims and non-compliant products.

7.6. Priority 6: Invest in safer places to ride

Use the growth of e-bikes as a reason to accelerate investment in safe and separated cycling infrastructure.