

The Hon. John Graham MLC  
Minister for Transport  
52 Martin Place  
SYDNEY NSW 2000

4<sup>th</sup> May 2026

Email: via [website](#) and [e-micromobility@transport.nsw.gov.au](mailto:e-micromobility@transport.nsw.gov.au)

## E-micromobility sharing schemes reform

Dear John,

As you're aware, Bicycle NSW is a strong supporter of shared mobility of all kinds including shared e-bikes. The benefits are significant and we continue to hear user success stories and the many positive outcomes for our community, environment, economy and society.

However, we fully acknowledge the challenges involved in shared e-bikes. We have been advocating for a regulated scheme for some time to ensure we realise all of the benefits but manage and limit the downsides and risks involved with shared e-bikes.

[Bicycle NSW made a substantial submission](#) to the 2024 Parliamentary Inquiry into the use of e-scooters, e-bikes and related mobility options, including a strong request for shared scheme reforms. The Transport Portfolio Committee subsequently made seven key recommendations to improve sharing schemes in its report.

### **Bicycle NSW strongly supports the NSW Government's efforts to develop a strong set of reforms in the wake of the Parliamentary Inquiry.**

Through our own deep knowledge and insight into shared e-bikes as well as our deep relationships with Councils and Bicycle NSW Members across NSW, we would like to convey the following ideas and feedback to further improve the draft regulations and guidance materials:

- **Establish an optimal number of approved shared e-bike operators**

A market which has three or more vendors ensures that monopoly operations are unable to exist. In the opinion of Bicycle NSW, there should always be **at least 3 vendors** approved by TfNSW.

We recognise that more than 3 vendors would create additional administration. However, allowing innovative companies with emerging technology into the space would drive best practice and guarantee strong innovation and consumer benefits.

As an example, there could be a cap on three vendors with the opportunity to trial another temporary vendor which could then be allowed to apply for access to the scheme when the contracts are next due for renewal (under a competitive tender or scheme).

- **Impose a fair cap on the devices allowed per operator**

To ensure monopoly conditions aren't allowed to prosper, there needs to be limits set on the capping *proportions* for the vendors. It must be realised that very low caps for one provider may not be economically viable, allowing a competitor to have an unfair advantage. A **maximum cap of 50% of the total fleet** in an area is suggested for any single vendor to allow fair competition and optimal conditions and pricing for users.

- **Allow councils to access fees without unnecessary red tape**

Any funding arrangement needs to be fair and equitable to ensure fees are allocated for the specific purposes for which they were levied. Currently, it is proposed for the NSW Government to retain 75% of the funds, which councils can then access via a grants program for specific shared e-bike initiatives to ensure an effective and safe scheme.

Bicycle NSW is concerned that this additional administration will throttle the flow of funds and reduce the overall funding available.

- We support councils' advocacy for a larger proportion of the proposed regulated cap of \$0.80 per trip to go directly to council.
- Grants must be simple and straight forward for councils to apply for, without the delays common with other TfNSW grant programs. Grants should be (i) available all year round, (ii) specific to the scheme needs and (iii) supported by the local data to ensure appropriate governance and transparency.

- **Ensure that enforcement is supported by a robust reporting framework**

As proposed, penalties for vendors who don't meet service expectations must be clearly outlined and enforced with funds being returned to Councils from Revenue NSW, as happens with a parking fine.

However, simply not meeting one standard or metric isn't a sufficient justification for enforcement. There needs to be a pattern and trend for not meeting expected standards and thresholds, and in multiple areas, to reduce the likelihood of nefarious reporting. For example, a person can't simply remove helmets and move e-bikes to try and seek an enforcement action on a particular vendor. There needs to be a pattern of poor service and breaches of the service agreement.

- **Share data freely with relevant stakeholders**

The draft reforms for shared schemes outline mandatory data sharing with NSW Government and councils. The consistent collection and standardisation of data is critical to ensure it can be quickly and easily analysed by governments to inform timely responses to changing circumstances and environments.

However, Bicycle NSW is concerned that data will remain hidden from the public, other councils and competing operators.

Data should be treated as a public asset, published on an online dashboard and made available with different levels of access to councils, Government departments, academics and advocacy bodies such as Bicycle NSW. As an example, a council should be able to access all data inside their own LGA as well as a reasonable level of data in other areas to compare, benchmark and improve their own local shared mobility programs.

- **Facilitate parking bays on state government land**

It is positive to see councils taking initiative and leadership in using their own knowledge and awareness to select shared e-bike parking bays. After all, councils are best placed to know and understand their community's needs. Bicycle NSW is particularly pleased that the new parking guidance explicitly recommends on-street parking in high activity locations. This will help protect walking space.

However, there will be many situations across NSW where parking bay locations will logically be located on land controlled by state government agencies. This includes at schools, hospitals, public transport hubs and waterfront public spaces, as well as on state roads. In these circumstances, **consent should not be unreasonably withheld.**

In many cases, these locations are currently impacted by poor parking practices. The NSW Government will therefore benefit from councils using small portions of underutilised land to improve access to shared e-bikes - without having to enter into an unnecessary agreement or contract.

- **Review the new regulatory framework frequently**

A statutory review of the new regulations must be conducted after 18 months. However, given the rapidly changing environment, technology ecosystems and user trends, Bicycle NSW believes this initial period should be less. So many variables both known and unknown can change in this period. Therefore, we suggest that **the review period is reduced to 12 months** and repeated at annual intervals.

In addition, regular round tables with stakeholders including Bicycle NSW would provide a forum for feedback to inform regulatory amendments.

- **Include flexibility in the regulations to encourage best practice**

Additional flexibility should be incorporated into the review processes to allow operators, councils and NSW Government to take advantage of test-and-learn opportunities, innovative ideas or small service improvement initiatives while still remaining compliant.

A **limited innovation clause** should be included to allow a council to introduce a rapid innovation and adjust provisions if there is a significant community benefit.

- **Increase funding for cycling infrastructure across NSW**

Cities must adapt to support the safe and widespread uptake of shared e-mobility and take advantage of low-cost, sustainable transport options provided by shared schemes

This means separated bicycle infrastructure in appropriate places, and reduced vehicle speeds everywhere else.

Bicycle NSW continues to advocate for **a substantial increase in the Get NSW Active program** so councils can deliver hundreds of shovel-ready projects, and the prioritisation of funding for the construction of the Strategic Cycleway Corridors.

We also take this opportunity to remind the NSW Government of the importance of [reducing speed limits](#) to a level that enables bikes to safely share the road with vehicles. In high pedestrian activity areas, on mixed traffic cycle routes and around schools, **30km/h is the best practice speed limit.**

## **In conclusion**

We reiterate that the NSW Government should be applauded for introducing this nation-leading regulation. The work to date has taken leadership and courage, and is undoubtedly being observed by other states looking to implement reforms.

Bicycle NSW hopes that the final sharing scheme reforms will include the necessary amendments to position e-mobility for sustained and successful growth.

I thank you for your time concerning this matter.

Yours sincerely,

A handwritten signature in black ink that reads "P. McLean". The signature is written in a cursive, slightly slanted style.

Peter McLean

Chief Executive Officer  
Bicycle NSW

*Bicycle NSW has been the peak bicycle advocacy group in NSW for fifty years, and has more than 30 affiliated local Bicycle User Groups. Our mission is to 'create a better environment for all bicycle riders', and we support improvements to facilities for pedestrians and cyclists. Bike riding provides a healthy, congestion-reducing, low-carbon form of travel that is quiet, efficient and attractive for all ages with the correct infrastructure design.*