

COTA SA Submission to Department for Infrastructure and Transport Review of Personal Mobility Device and E-bike Rules in South Australia

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Acknowledgement of Country

COTA SA acknowledges and respects Aboriginal people as the Traditional Custodians of the lands and waters of South Australia. We honour Aboriginal peoples' continuing connection to Country and recognise that their sovereignty was never ceded. We pay our respects to Elders past, present and emerging, and extend that respect to all Aboriginal people.

Introduction

As the peak body representing more than 700,000 older South Australians, COTA SA is committed to transport systems and public spaces that enable people of all ages and abilities to move around safely, confidently and independently.

This submission draws on concerns raised by older South Australians through our 2024 member survey and subsequent [submission](#) on the *Statutes Amendment (Personal Mobility Devices) Bill 2024*, while recognising that technology and the transport environment continue to evolve. Our overarching position is that South Australians should have safe, affordable and accessible ways to move around their communities. New mobility options can help, including for older people, but walking, cycling and navigating public spaces must remain as safe as possible for all users.

Older people and road safety

Research consistently demonstrates that compared to younger drivers, older drivers are significantly less likely to be involved in a crash. Additionally, older people are proportionately under-represented in road accident injuries and fatalities. However, if they are involved in a road accident, an older person is significantly more likely to experience serious injury or fatality compared to a younger person. The safety concerns and experiences of older road users should be understood in this context.

The concerns of older pedestrians remain

COTA SA's 2024 survey demonstrated significant concern among older South Australians about e-scooters. Seventy per cent of respondents did not support the proposed legislative change, 81% reported feeling personally unsafe around e-scooters when walking or driving, and 77% identified trip hazards and environmental clutter from inadequate parking as concerns.

Older people described fast-moving devices passing unexpectedly on footpaths and shared paths, insufficient audible warnings, riders weaving around pedestrians, and poorly parked or abandoned scooters creating trip hazards. For some, these experiences reduced confidence in walking locally.

We have not undertaken further research since 2024 and do not present these findings as a measure of current community sentiment. However, the underlying concerns about pedestrian safety, speed, parking, rider behaviour and enforcement remain relevant. Perceptions of unsafe or unpredictable walking environments can themselves discourage older people from walking and participating in community life, working against broader objectives around active ageing, preventive health, social connection and ageing well.

An increasingly complex transport environment

COTA SA encourages the Government to consider these reviews as part of the broader challenge of safely accommodating an increasing diversity of transport modes.

Pedestrians, cyclists, PMD users and drivers are increasingly negotiating spaces used by modes with very different characteristics and speeds.

Pedestrians should remain the priority users of footpaths. Where powered or power-assisted devices share space with pedestrians, regulation should recognise pedestrian vulnerability and require riders to travel at speeds and in a manner appropriate to the environment.

However, rules and speed limits can only go so far. As transport modes become more diverse, South Australia will increasingly need infrastructure that reduces conflict rather than relying on pedestrians and faster-moving devices to negotiate limited shared space. COTA SA therefore supports greater consideration of separated and appropriately designed walking, cycling and e-mobility infrastructure.

Rules must be understood as well as established

Our 2024 submission raised questions about whether riders would understand and comply with PMD rules and how those rules would be monitored and enforced. Recent [RAA research](#) reporting significant gaps in South Australians' knowledge of current e-scooter rules, including speed limits, suggests these questions remain relevant.

Any changes resulting from this review should therefore be accompanied by sustained public education, clear communication and effective enforcement. Rules should be straightforward and consistent, including where different requirements apply to e-bikes, PMDs and other devices, and enforcement responsibilities should be clear and adequately resourced.

Safety, accessibility and device weight

COTA SA supports measures that make safe behaviour easier and less dependent solely on individual rider compliance. Technology increasingly allows safeguards to be built into devices and shared mobility systems, including pedestrian and footpath detection, automatic speed management, improved braking and stability, and systems to identify and relocate poorly parked devices.

In this context, COTA SA notes that the current PMD framework generally limits devices to 45 kilograms, while providing a mechanism for approval of heavier vehicles in appropriate circumstances.

We have recently had the opportunity to see a newer type of shared PMD incorporating three wheels, greater stability and the option of seated use, alongside technologies designed to improve pedestrian detection, speed management and parking.

This type of design may offer a more stable and approachable form of short-trip mobility, including for some older people who would be unlikely to use a conventional two-wheeled e-scooter.

Older people should not be considered only as pedestrians requiring protection from new transport technologies; they may also benefit from innovation that provides safer and more accessible mobility options.

COTA SA therefore supports a regulatory approach that can accommodate heavier devices where there is credible evidence that their additional weight enables improved safety, stability or accessibility. Any such pathway should be subject to appropriate safeguards relating to dimensions and speed, braking and stability, operator accountability, maintenance, insurance, parking management and relevant safety technologies.

E-bikes and higher-powered devices

COTA SA recognises that compliant e-bikes can support mobility and independence, including for older people who may find conventional cycling difficult because of distance, gradients or physical capacity.

However, higher-powered devices that resemble e-bikes but have substantially different speed and performance characteristics create concerns, particularly where they interact with pedestrians. COTA SA supports clear distinctions between compliant e-bikes and higher-powered devices, backed by effective regulation, consumer information and enforcement.

Safe mobility choices for all ages

COTA SA supports innovation and new mobility choices, including PMDs and e-bikes that can provide affordable, convenient and sustainable alternatives to private vehicle use. However, these benefits should not come at the expense of people's confidence in using public spaces, particularly pedestrians and others more vulnerable to injury.

As South Australia's transport environment becomes more diverse, we encourage the Government to pursue a coherent approach that prioritises pedestrian safety while enabling safe, accessible and appropriately regulated new mobility choices.

Summary of recommendations

- Prioritise pedestrian safety on footpaths and shared paths, recognising the particular vulnerability of older people and others at higher risk of injury.
- Ensure rules for PMDs, e-bikes and higher-powered devices are clear, consistent and well communicated, including at the point of sale or hire.
- Support effective enforcement and sustained public education so that regulations translate into safe behaviour in practice.
- Invest in separated and appropriately designed infrastructure to reduce conflict between pedestrians, cyclists, PMD users and motorists.
- Encourage safety-focused technology and responsible shared-scheme operations, including speed management, parking controls, maintenance and operator accountability.
- Explore a regulated approval pathway for heavier devices that demonstrably improve safety, stability or accessibility.

COTA SA would welcome the opportunity to discuss these matters further as the Government considers the outcomes of the review.

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