

**QUEENSLAND TOURISM  
INDUSTRY COUNCIL  
SUBMISSION: MICROMOBILITY  
LICENSING FRAMEWORK –  
TOURISM IMPACTS**

Submission to Queensland Parliament



**QUEENSLAND  
TOURISM INDUSTRY  
COUNCIL**



## 1. Executive Summary

QTIC supports the intent of improving safety outcomes across Queensland's micromobility environment. However, the proposed licensing framework, as currently understood, presents significant unintended consequences for the visitor economy.

Feedback from operators across Queensland demonstrates that the current policy direction risks:

- **Excluding international visitors from participation.**
- **Preventing children and families from engaging in guided tourism experiences.**
- **Capturing low-risk, compliant tourism operations within a regulatory model designed for high-risk public use.**

Without targeted exemptions and a differentiated regulatory approach, the framework will materially impact regional tourism businesses, reduce visitor accessibility, and undermine Queensland's competitiveness as a destination.

## 2. Industry Evidence and Operator Impacts

QTIC has undertaken direct engagement with operators across multiple regions, including Noosa, Sunshine Coast, Far North Queensland and Brisbane. Consistent themes are emerging:

### 2.1 Loss of International Market Access

- A significant proportion of micromobility users in tourism contexts are international visitors, many of whom may not hold a valid driver licence.
- Key inbound markets (e.g. Asia and Europe) have lower rates of licence ownership, particularly among younger travellers.
- Requiring a licence will immediately exclude a substantial portion of visitors, particularly in high-volume destinations.

#### **Impact:**

Reduced participation in tours, lower visitor spends, and diminished destination competitiveness.

### 2.2 Elimination of Family and Youth Tourism Experiences

- Many guided tourism products include children under 16 as core participants (family groups, school holiday markets, educational tours).
- A licensing requirement would prohibit participation entirely, as minors are not eligible for licences.

#### **Impact:**

- Immediate loss of family-based tourism products.
- Reduced accessibility of experiences.
- Disproportionate impact on regional operators reliant on family visitation.



### 2.3 Disproportionate Impact on Structured, Low-Risk Tourism Operations

Operators have clearly articulated that their business models differ fundamentally from general public use:

- Guided tours operate in controlled environments.
- Speeds are low and managed.
- Participants receive mandatory safety briefings.
- Operators maintain supervision and duty of care.

Despite this, the proposed framework risks treating these operations the same as:

- Unsupervised public use.
- Modified or non-compliant devices.
- High-speed urban commuting environments.

#### **Impact:**

Well-managed, compliant tourism businesses are inadvertently captured by regulations not designed for their risk profile.

### 2.4 Immediate Commercial Consequences

Operators have advised that if licensing is introduced without exemptions:

- Bookings will decline significantly.
- Advance international bookings will be cancelled.
- Business viability, particularly in regional areas, will be at risk.

This is not a theoretical impact — it is immediate and material.

## 3. Policy Issue: Lack of Risk-Based Differentiation

The central issue is that the proposed framework does not adequately distinguish between:

<b>Tourism Use</b>	<b>General Public Use</b>
Guided, supervised	Unsupervised
Controlled environments	Open public environments
Low-speed, compliant devices	Variable, often modified devices
Operator accountability	Individual responsibility

A single regulatory approach across these fundamentally different use cases will result in over-regulation of low-risk activity and ineffective targeting of higher-risk behaviour.

## 4. QTIC Position

QTIC supports a balanced, evidence-based regulatory framework that improves safety outcomes while maintaining accessibility to tourism experiences.

To achieve this, the framework must include:



#### 4.1 Exemption for Guided Tourism Experiences

A clear exemption should be established for:

- Licensed tourism operators.
- Guided tours.
- Structured, supervised environments.

##### **Suggested approach:**

- Operator accreditation requirements.
- Mandatory safety briefings.
- Controlled operating conditions.
- Clear duty-of-care obligations.

#### 4.2 Pathway for Under-16 Participation

Introduce a regulated pathway allowing minors to participate in tourism experiences, supported by:

- Parental/guardian consent.
- Operator supervision.
- Defined operating environments.

#### 4.3 Recognition of International Visitors

To maintain global competitiveness, the framework must include:

- Recognition of international driver licences **or**
- A specific exemption for tourism participation.

Without this, Queensland risks becoming inaccessible to key inbound markets.

#### 4.4 Risk-Based Regulatory Model

The framework should explicitly distinguish between:

- **Commercial tourism operations** (low-risk, structured)
- **General public use** (higher variability and risk)

This ensures regulation is:

- Proportionate.
- Targeted.
- Effective.

### 5. Broader Economic Considerations

Tourism is a critical economic driver for Queensland, particularly in regional areas.

The unintended consequences of this policy include:

- Reduced visitation and spend.
- Loss of small business revenue.
- Reduced employment in tourism-dependent regions.
- Erosion of Queensland's competitive positioning ahead of **2032**.

At a time when the state is actively investing in tourism growth, these settings risk undermining broader strategic objectives.

### 6. Conclusion

QTIC strongly urges the Committee to ensure the final legislative framework:



- Recognises the **distinct nature of tourism operations**.
- Maintains **accessibility for international visitors**.
- Enables **family participation**.
- Applies a **risk-based, proportionate approach**.

Failure to address these issues will result in significant and avoidable impacts on Queensland's visitor economy.

QTIC remains committed to working constructively with Government to achieve a solution that balances safety outcomes with economic and visitor access considerations.

## 7. Further Engagement

QTIC welcomes continued engagement with the Committee and relevant agencies to:

- Provide additional industry data.
- Facilitate operator consultation.
- Support development of practical implementation pathways.

## About QTIC

The Queensland Tourism Industry Council (QTIC) is the peak industry body and leading advocate for Queensland's visitor economy, committed to the growth and sustainability of the state's tourism industry.

As a not-for-profit, membership-based organisation, we take pride in ensuring that the concerns and needs of our members and the broader tourism industry inform all relevant policy debates and that businesses have strong representation in decision-making processes.

Through delivery of workforce and skilling programs, and advocating for attraction and infrastructure investment, QTIC serves members and industry. We also provide expert advice and support, including workforce and business development opportunities and access to vital industry insights.