

**Submission  
No 158**

## **INQUIRY INTO USE OF E-SCOOTERS, E-BIKES AND RELATED MOBILITY OPTIONS**

**Organisation:** Doordash  
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**16 August 2024**

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Dear Committee Chair,

On behalf of DoorDash Australia, I would like to thank the Committee for the opportunity to provide a written submission to the inquiry into the use of e-scooters, e-bikes and related mobility options. DoorDash is firmly committed to contributing positively to any reforms that protect independent contractors while supporting small businesses, consumers, and the economy. We focus this comment on electric bicycles, or e-bikes, as they are an important vehicle for many Dashers that use the DoorDash platform, and we're pleased to provide you with input regarding policies that can help support Dashers who choose this mode. We hope New South Wales will continue to promote policies that make it safe, easy, and convenient for people to use e-bikes, whether it is for recreation, transportation, or work.

DoorDash (NASDAQ: DASH) is a technology company that connects consumers with their favourite local businesses in more than 30 countries across the globe. Founded in 2013, DoorDash builds products and services to help businesses innovate, grow, and reach more customers. DoorDash is your door to more: the local commerce platform dedicated to enabling merchants to thrive in the convenience economy, giving consumers access to more of their communities, and providing work that empowers. In 2023, DoorDash empowered over 213,000 Australian Dashers – the couriers working on the platform – from all walks of life to earn money when, where, and how they choose by delivering meals and other essentials to their communities. Dashers consistently express that their driving motivation for delivering with DoorDash is the pursuit of independence, choice, and flexibility, setting it apart from conventional employment.

E-bikes are an increasingly important tool for facilitating deliveries through DoorDash, and they offer several important benefits for Dashers, merchants, and communities in New South Wales. First, e-bikes are an affordable and low-barrier transportation option that people can use to earn extra money on DoorDash. By offering options for people to deliver through alternative modes like bike or e-bike, we're ensuring that people who don't want a car or can't afford one still have access to the earnings opportunities our platform offers. Second, e-bikes offer benefits to merchants in more congested areas. By reducing car traffic, e-bike delivery can help these businesses avoid unwanted congestion or community impacts around their store when they offer delivery. Finally, e-bikes offer advantages to local governments and communities by enabling



fewer car trips to be made. This means less traffic, reduced emissions, and fewer parking issues. Due to these benefits, DoorDash has been prioritising the growth of e-bikes for delivery.

## 1. Dashing by E-Bike in New South Wales

Dashers that use bikes and e-bikes are an important component of how DoorDash enables delivery. The use of bikes and e-bikes by Dashers is fast growing; in the first half of 2024 nearly 5,000 Dashers used bikes or e-bikes to pick up deliveries in New South Wales out of a total Dasher population of over 40,000. E-bikes have been the primary driver worldwide in enabling our growth of bike-based deliveries.

As e-bike ownership and use continue to rise in popularity we hope we can grow these numbers even further in order to help support the communities in which we operate. We're optimistic that this growth can ultimately facilitate high-quality delivery with little impact on emissions and congestion.

However, we also recognise that protecting safety is crucial as more Australians use bikes and e-bikes to get around. These safety concerns touch on both safe riding and the quality of the e-bikes themselves. We've worked hard to encourage and promote safe e-bike use to Dashers by going above and beyond the regulatory requirements in New South Wales to support delivery workers on our platform and help ensure they are educated and well equipped.

In 2022 and 2023, new requirements came into force in New South Wales that provide rigorous mandates for third-party platforms like DoorDash when it comes to e-bike safety. As a result of these policy changes, DoorDash has:

- Created a safety course that every Dasher using an e-bike must take before they can join the platform;
- Issued completion certificates to each Dasher that takes the safety course;
- Provided hot bags with reflective stripes to each Dasher that signs up to delivery using a bike or e-bike; and
- Provided high-visibility vests to each Dasher that signs up to delivery using a bike or e-bike.

However, we've not stopped at meeting these regulatory mandates. We are also proactively making ongoing efforts to promote safety by:

- Making safety tips easily available to Dashers at any time within the Dasher app;
- Providing Dashers with access to free or discounted safety equipment, including bicycle-friendly phone cradles to reduce the risk of distractions and reflective armbands to increase visibility at night;
- Reducing the number of in-app notifications Dashers may receive while dashing; Dashers now only receive select, time-sensitive notifications that would relate to that immediate dash - such as a change to the delivery address;
- Publishing best-practice safety tips, including cycling safety strategies, information on equipment that helps enhance bike safety, and information regarding why proper maintenance is important for staying safe while riding;
- Partnering with Zoomo, an Australian leader in providing quality e-bikes to delivery riders, to provide Dashers with access to affordable e-bikes, as well as events to promote road safety and best practices;



- Reminding Dashers of the importance of proper bike maintenance including inspecting their bike before every ride to check the tyres, seat height, brakes and gears for any signs of damage or issues; and
- In the rare event that a safety incident arises, making it quick and easy for Dashers to report an incident if something does happen during or after a delivery.
  - Dashers are able to report a safety incident directly via the app or contact Support.
  - DoorDash has a specialist trust and safety team available 24/7 ready to respond to any safety report, provide support or engage with law enforcement as needed.

We're proud of the efforts we've taken to promote Dasher safety and believe these initiatives have improved the experience of workers that use our platform in New South Wales and throughout Australia.

## **2. Important Considerations for Future Policymaking**

We recognise that New South Wales is facing new challenges as the use of battery-powered mobility devices grows. Issues related to the quality of e-bikes, how fast they travel, and where they should be allowed will continue to arise as more people choose these vehicles. Below we offer our perspectives on issues we see emerging in this space, as well as implications for delivery workers that we hope policymakers will consider as they formulate policy.

### **a. Product Safety**

Australia and other countries throughout the world are confronting new product safety concerns related to e-bikes. There appear to be two primary issues: 1) poor quality e-bikes and batteries that pose unacceptable fire risks; and 2) e-bikes that don't actually meet the speed or power requirements set by law and therefore travel too fast.

We recognise that NSW has been a leader in developing safety standards for e-bikes to address these issues, and we applaud the province for its proactive approach. However, we also agree with NSW that standards are best set at a federal level so that the entire Australian market is harmonised. We think it's important that these product safety regulations address manufacturers, importers, distributors, and retailers to ensure that only compliant devices make it to Australian consumers. Once people have already purchased these devices, it's too late. We've recognised this problem globally, and have already been directly engaged in efforts in the U.S. to strengthen federal product safety requirements for e-bikes.

In addition to protecting the safety of end users through federal standards, it may also make sense to address emerging categories, such as e-cargo bikes, that offer new opportunities to replace car trips. These devices can require higher power outputs than needed for traditional e-bikes, and it may make sense to align with other regions like Europe that have addressed issues such as motor wattage on e-cargo bikes.

We support strong, comprehensive federal product safety standards for e-bikes throughout Australia that protect consumers and help bring the right products to the market. Clear rules that properly police what devices can be sold will ultimately make it easier for Dashers to know they are getting a safe and legal e-bike when they buy one.



## **b. E-Bike Use Regulations**

### *i. Vehicle Status*

We firmly believe that e-bikes are an important tool for transportation and mobility that are valued by Dashers. We hope that policymakers will ensure that a class of low-speed e-bike remains regulated similarly to bicycles, with a low barrier to use. Ensuring that a subset of e-bikes with appropriate speed and power limitations are free from requirements such as registration, licensing, or insurance is crucial to helping platforms like DoorDash facilitate e-bike delivery and ensure that a wide range of people - including those without cars - can access the work offered through our platform.

### *ii. Rules for Use*

Similarly, we hope that policymakers will continue to facilitate the use of appropriate types of e-bikes on bicycle infrastructure. Ensuring that low-speed e-bikes can travel on bike paths and in bike lanes is an important aspect of their appeal and helps minimise their interactions with motor vehicles. We hope NSW will continue to view low-speed e-bikes as bikes when viewed from the perspective of where they should travel. This will ensure that Dashers that use e-bikes can stay as safe as possible while travelling and avoid proximity to cars.

## **c. Infrastructure Improvements**

At the local level, we hope that councils in NSW will continue to invest in bike infrastructure improvements, and that the Committee will support those efforts. Expanding the availability of safe places to ride will likely enable platforms like DoorDash to grow deliveries on these modes and reduce car trips, producing peripheral benefits to our cities and towns through reduced congestion and emissions.

## **3. Moving Forward**

DoorDash has a strong commitment to ensuring that Dashers can use e-bikes for delivery work on its platform while still protecting public safety. To that end, we stand ready to support New South Wales and its communities in their efforts to improve bike safety. While we would welcome input from the Committee with respect to how we can be most helpful in that conversation, areas where DoorDash may be able to meaningfully contribute include:

- Supporting stronger federal product safety standards to eliminate clear risks such as e-bikes equipped with unsafe batteries or vehicles that travel too fast;
- Creating new awareness campaigns or partnerships with government and local councils to inform Dashers of emerging safety issues, for example, what types of devices are in fact e-bikes and what the best practices are for battery charging and storage;
- Amplifying important government safety announcements by directly putting them in front of Dashers;
- Sharing data on delivery bike trips (consistent with privacy requirements) to help stakeholders better understand where bike infrastructure is most needed or would provide the most value; and



- Offering our guidance, engagement and support to local councils and the New South Wales government as it develops general road safety resources or campaigns.

Thank you for considering our input as you address these important issues. We are open to engage in further discussion about bike safety and road safety concerns at any time.