

# ONSHORE MARINE

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## FACSIMILE MESSAGE

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08/07/2010

Faxed to : 08 8224 0912

Subject : Comments on RIS "Reducing Emissions from non-road spark ignition engines and Equipment".

To Whom It May Concern

We are a retail boat & engine dealer located in Meridien Marina in South East Queensland & have been in business for over 30 years. We are the authorized agents for Mercury outboards, Mercruiser Inboards & Sterndrives & Yanmar diesel engines & currently employ 7 people in the business.

We have reviewed the RIS dated May 2010 & are supportive of DEWHA's efforts to reduce emissions & improve air quality. There are some issues we would like to raise regarding the implementation of such a regulation & they are outlined herein.

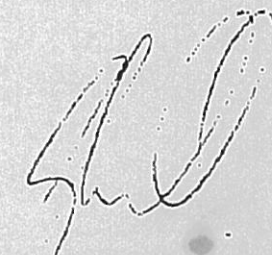
- **Boat Evaporative Emissions** - The proposal is that the boat evaporative emissions requirements go into effect in 2012. First, some of these requirements are not even required in the US EPA rule in 2012. Secondly, the 2012 model year for many boat manufacturers starts in July 2011. Since we have yet to see the actual regulation, we would expect it to take at least the rest of the year to finalise it, this is only giving builders & dealers 6 months to completely re engineer the boats fuel system. This will also require components (low permeation hoses, anti spitback deck fill, carbon canisters, grade valves, low permeation fuel tanks etc) that are not currently available in Australia, & in fact are just being developed in the US. US EPA has given the US boat builders several years to comply with this regulation & we understand it is still a challenge. We suggest that these requirements be pushed out to at least 2015 to give a reasonable time to develop compliant systems.
- **Engine requirements** - The proposal discusses engines meeting the EPA 2010 rule in 2012. This is very unclear as there are engine requirements in the EPA rule that are not effective until 2013 - 2015.
- **Conventional 2-stroke Outboards** - We have boats & transoms that will need to be redesigned to accommodate 4-stroke or Direct Injected 2-stroke Outboards. These engines are generally heavier than conventional 2-stroke engines. We need additional time & phase out period. Also there are markets where a very lightweight engine is required by the users.

- The cost benefit analysis shows almost the same results for full implementation in 2012 vs a phased in approach.
- This proposal may remove several very clean engines from the market because they are slightly above the standard. These engines are averaged in for the EPA rule. These engines are 90% cleaner than the 2-stroke engines they may replace. Losing these engines from the market will reduce consumer choice & discourage some people from replacing a high emitting engine with a low emitting engine.
- Requiring Stern-drive & Inboard engines to go to catalysis in 2012 only gives boat builders 6 months to implement these new, larger, heavier & more costly engines.

Our industry has been hit hard by the recent economic recession as our products are mostly discretionary purchases. All of these requirements are adding cost to our products, in many cases, thousands of dollars. We urge you to consider the above issues & business consequences, if you go forward with the regulations.

I believe that I would be forced to evaluate the number of my employees under your proposed implementation date of 2012 with a view to reducing the number of staff I have by anywhere up to 33%. This would have a profound affect on these families especially in today's market place & economic outlook.

Yours sincerely



George Mansell...  
Proprietor  
Onshore Marine