



Australian National Sportfishing Association Ltd

ACN 063 293 514

COMMITTED TO CONSERVATION AND INTEGRITY IN SPORTFISHING SINCE
1967

6 July 2012

Dr Tertius de Kluiver,
Senior Policy and Project Officer,
Environment Standards Branch (Air Quality)
Department of Sustainability, Environment, Water, Population and Communications
POP Box 787
Canberra
ACT 2601

Dear Dr de Kluiver,

Re: Reducing Emissions from Non Road Spark Ignition Engines and Equipment

Thank you for the opportunity to comment on the options for reducing pollutant emissions from petrol based marine engines.

To be honest myself and fellow ANSA Board members were very surprised and concerned by many of the statistical figures contained in the Regulatory Impact Statement. While mindful of the progressive move by boat owners in more recent times to purchase 4 stroke or direct injected 2 stroke outboard engines either as replacement engines or as engines of choice for new boats it is indeed alarming that almost none of these engines currently meet the USA emission standards. What is worse though is that the majority of engines still being purchased as either replacement engines or for new boat packages are carburettor 2 strokes which fall well short of desirable or regulatory emission standards. It is of considerable concern that Australia has fallen so far behind the rest of the world in managing marine engine emissions and that we have been used as a dumping ground for the sale of outboards made in the USA which could not be sold in the country of manufacture because of compliance deficiencies.

Price is certainly a major factor influencing the decision on the purchase of an outboard and consequentially it is not surprising that many purchasers will opt for the cheaper version without proper regard for the environmental implications or the fact that over time the running and servicing costs of a cheaper old technology engine will overtake the capital cost plus running and servicing costs of a high tech compliant engine – a false economic rationale.

We believe that most recreational fishers and boat owners are environmentally conscious and do whatever they can to undertake their sporting pursuits with full regard to responsible environmental practices. We are confident that many boat owners would not be aware of the emission problems generated by ongoing use of older outboard motors or for that matter many of the newer high tech models. It could be construed that the boating public has been

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deliberately kept in the dark or misled by those engaged in the marine industry both at home and abroad.

ANSA supports the proposal for the introduction of emission standards for all marine engines. This can be either the USA standard or some other internationally accepted standard. It is also an imperative that regardless of whatever the emission standard decided upon, that there be a mandatory straightforward rating /labelling standard for all engines so that the buying public can be readily aware of the environmental rating and fuel efficiency of such engines and take these factors into account when purchasing an engine.

With the Federal government moving to remove lead free petrol from the market place in favour of ethanol blended fuel which is not compatible with older 2 stroke engines it can be expected that over the next year or so there will be a major demand for the purchase of new replacement outboards. It is important therefore that any new emission standard and labelling regime be introduced as soon as administratively possible.

ANSA is mindful that many within the marine industry are generally supportive of the introduction of an emission rating standard but are making the case for introduction of such a standard to be deferred until 2015. ANSA would prefer an earlier time line that this but is mindful of the challenges facing industry and it is more important to get the process right rather than to rush it.

ANSA looks forward to working with the Department on this very important environmental regulatory issue.

Yours sincerely

A handwritten signature in black ink, appearing to read 'J. Burgess', with a large, stylized loop at the end.

John Burgess
Executive Officer/Director ANSA Ltd
Vice President ANSA NSW