

RECEIVED

14 JUL 2010



Boatland Winnellie
Po Box 2107
Parap N.T. 0804.
Phone: - [08] 89843277.
Fax: - [08] 89470310.
ACN 009629618 ABN 29009629618

Project Manager
Level 5/81 Flinders Street
Adelaide SA 5000
Email: kscott@ephc.gov.au
Fax : (08) 8224 0912

09/07/2010

Subject : Comments on RIS "Reducing Emissions From Non-Road Spark Ignition Engines and Equipment"

To Whom It May Concern:

We are a retail boat dealer located in Darwin and have been in business for 30 years. We are the authorized agents for Mariner Motor brand and employ 6 people in our business.

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

- A lot of our customers live in very remote areas on islands and in Aboriginal communities. The simpler 2 stroke motors suit their usage in a number of ways.
 1. They are lighter and can be taken on & off boats for storage.
 2. They are a lot simpler to work on and can be worked on by basic mechanics and do not have to be repaired by trained technicians with computers.
 3. Price is also a big factor many of these people are on basics card etc and would never save up the extra cost for the more expensive motors.
 4. The quality of fuel that they put thru most of the time is very poor quality and will cause major failure in most of the new type motors.

I'm mainly talking about out boards up to 40hp & the odd 60hp, bigger motors are normally maintained better and the owners are in better position to fly in technicians when problems occur.

- Another big part of our market is the gray nomads who represent a big part of our Tourist industry as well, fishing the remote northern rivers and billabongs of the NT they need outboards 15 to 30hp and the 4/ models of most of these are to heavy for old people to lift on & off by them selves.
- Conventional 2 Stroke Outboards – We have boats and 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 and a phase-out period. Also, there are markets where the users require a very lightweight engine.

Our industry has been hit very 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, and business consequences, if you go forward with a regulation.

I believe that some of the change would be very prejudice against certain parts of our community. Take away their ability to fish & hunt and for older members of the community the ability to enjoy a health outdoor retirement. The cost of the emissions from these small out board motors would be nothing compared to the cost to the health system if they stopped the health eating of fresh caught fish & crabs, and just ate take away, or stayed at home waiting to go into an old folks home.

Sincerely,

A handwritten signature in dark ink, appearing to be 'Wayne', with a long, sweeping horizontal line extending to the right.

Wayne "Buffalo" Ross