

From: Kerry Scott
Sent: Friday, 23 July 2010 10:11 AM
To: Haemish Middleton
Subject: FW: Comments on RIS "Reducing Emissions From Non - Road Spark Ignition Engines and Equipment"

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From: Peter Hallett [mailto:admin@midcoastmarine.com.au]
Sent: Friday, 23 July 2010 7:46 AM
To: Kerry Scott
Subject: Comments on RIS "Reducing Emissions From Non - Road Spark Ignition Engines and Equipment"

To Whom It May Concern:

My Company is Midcoast Marine Inflatables P/L, and we are located at West Burleigh on the Gold Coast. Our core business is supply and service of vital Surf Lifesaving craft and associated equipment to the Surf Lifesaving Associations not only in Australia , but throughout the World.

We also supply and service the Tohatsu range of outboard motors , and by far the most popular 2 stroke outboard motor used for Surf Lifesaving is the 25 hp Tohatsu outboard motor.

Supply and servicing to the surf lifesaving association represents approximately 75% of our business ,and to introduce the new emissions regulation would impact severely on our turnover and therefore jeopardise the future of our employees.

Also, the average weekend fisherman in a low to medium class income would be affected by this legislation, especially when they only use their boats on a very infrequent basis. Use versus cost versus environmental impact must be considered.

Sales of 4 stroke and 2 stroke fuel injected motors has only risen by about 10% in the past 5 years , so a major change such as this regulation would have a huge impact on our financial and sustainable position in the marine industry, given the current economic climate.

I have reviewed the RIS dated May 2010 ,and while i fully support and encourage DEWHA'S cause to reduce emissions in order to improve our air quality, there are some points which i wish you to kindly consider.

1). Our experience with Surf Clubs is , which is 30 years, has realised that funds to purchase any lifesaving equipment is very difficult to come by and often are funded by the weekly "chook" raffles and many hours of various fund raising activities.

Should the new regulation be implemented without a considerable phase in period, then Surf Clubs will struggle severely and this will compromise their effectiveness as a lifesaving icon. The new 4 stroke 25 hp motors are 50 % more expensive to buy and require specialised service equipment to maintain and in the event of capsize could render the motor permanently damaged, whereas, a capsize with a 2 stroke carby model motor will be re instated within 15 minutes after a capsize. A major impact on the practicality of mandatory legislation in terms of surf rescue having to comply with the possible new regulation.

2) The weight of the 4 stroke 25 hp Motors is almost 30 kg heavier than the current 25 hp 2 stroke carby version outboard motor. All inflatable rescue boats currently being used in surf lifesaving are only compliant to carry a motor up to 70 kg, the new 4 stroke motors weigh in at 80 kg.

If the regulation came in, this would mean all surf rescue IRB'S would not be able to be used, legally in terms of positive flotation compliance.

3) Manual handling (OH&S " policies on manual handling permit safe handling and 2 people can safely lift and carry the current 2 stroke motors. If we go to the 4 stroke motors we would require 4 persons to lift and carry the motor, very impractical and unsafe, people would be tripping over each other . Injury prevention is a key issue and we do not need to

be exposed to anything that may question or compromise that safety.

4) Balance and safe negotiating of the rescue boat in surf conditions would be severely affected if we had to go to the new regulation , as the craft would be too heavy at the rear, and could easily flip backwards in some of our more open beaches. Safe operation is vital , and the boat balance and performance is critical to safety. Should the 4 stroke motors become legislation (new technology low emission motors as a whole) then surf lifesaving clubs would have to sell all their current motors and boats and would have to design and test a longer boat to support the heavier 4 stroke motors. This will be a very expensive exercise and in reality would impact so severely on so many smaller surf clubs that they would probably cease to exist.

Surf Lifesaving is such an important part of the Australian culture , and who also encourage best practice and are all for the environment and associated issues, but we must remember they work on a voluntary basis, there is no bottomless pit of funds. Therefore i plead with the Regulators to embrace what inevitable impact mandatory regulation would do to the sustainability of the surf lifesaving association powercraft operations.

While i envisage that change and implementation is inevitable, an exemption for surf lifesaving activities or at least a 5 - 10 year phase -in period would be much better than a 2012 implementation as is proposed.

Thankyou for your consideration in this matter

Kind Regards

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