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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 Kununurra and have been in business for 8 years. We are the authorized agents for Honda Marine and employ 5 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 reinforce with you and bring to your attention.

- Boat Evaporative Emissions – The proposal is that the boat evaporative emissions requirements go into effect in 2012. First, any improvements made to the fuel storage systems on a vessel to make them safer for the operator and its passengers is a step in the right direction. Secondly, the 2012 model year for many boat manufacturers starts in July 2011. Since we have yet to see the actual regulation, and would expect it to take at least the rest of the year to finalise it, this is only giving boat builders and dealers 6 months to completely re-engineer the boat 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, and in fact are just being developed in the US. US EPA has given the US boat builders several years to comply with this regulation and we understand it is still a challenge. We suggest that these requirements be pushed out to at least 2013 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. These changes need to be crystal clear.
- Conventional 2 Stroke Outboards – Need be removed from our water ways ASAP and this push to remove conventional two stroke engines from the market should have happened ten years ago. The regulations need to include direction two strokes as well as any engine that uses a non captive lubrication system, should not be used in any waterway in Australia.

- The cost/benefit analysis shows almost the same results for full implementation in 2012 vs. a phased-in approach, but the cost to environment needs to out way any financial cost increase to the supplier of the engine or boat.
- Requiring Stern drive and Inboard Engines to go to Catalysts in 2012 is a great move as there needs to be a uniform approach to these changes.

Our industry has been hit very hard by the recent economic recession, but we need to move forward in a more environmentally friendly manner.

I believe that the removal of all two stroke engines from the market place is a monumental step forward. This should also include a time frame for the reduction in the use of two stroke engines in Australian waterways.
Leading to the banning of all two stroke engines by 2012.

Sincerely,

Beau & Natalie Robinson

EAST KIMBERLEY MARINE