

**AUSTRALIAN GOVERNMENT
ENVIRONMENT PROTECTION AND HERITAGE COUNCIL**

**Reducing Emissions From Non-Road)
Spark Ignition Engines and Equipment)
Consultation Regulation Impact Statement)**

COMMENTS OF CUMMINS SOUTH PACIFIC PTY.

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I. Introduction

CUMMINS SOUTH PACIFIC PTY hereby submits its comments regarding the Consultation Regulation Impact Statement published by the Non-Road Engines Working Group on behalf of the Environment Protection and Heritage Council, May 2010.

II. Summary of Comments

Cummins is generally supportive of alignment between environmental requirements for products sold in Australia to the products certified to U.S. EPA regulatory requirements. It is our recommendation to have emission regulations similar to Australian Transport Council (NTC) Automotive ADR80/03, which is a stable regulation because it is aligned to a non current US EPA version of the regulation. Albeit, the latest, amended version. Please find the fact sheet included in the following link: <http://www.ntc.gov.au/filemedia/bulletins/ADR80facts.pdf>. This is important because of manufacturing and shipping lead times dictate that manufactured goods would need to be shipped out of the country of origin months before the standard would take effect. This is inline with the NTC regulations in Australia.

The identification of engine's compliance to the emission regulation would be shown on the engine's data plate similar to the Canadian approach found in CEPA Phase II, SOR/2003-355. If the engine has information label showing it conforms to the EPA it is acceptable for sale in Australia.

III. Conclusions and Recommendations

The implementation schedule for Australia provide the necessary lead time for engine and/or equipment manufacturers to align product offerings between the U.S. and Australia.

Cummins looks forward to working with the Environment Protection and Heritage Council as emission requirements for non-handheld SSI engines are considered and/or adopted for Australia.