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26th July, 2010

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

To Whom It May Concern:

I write to you regarding the above subject and from the experience gained from our company Northside Marine which is a marine dealership which was established in 1965. We sell a range of new and used boats and are presently agents for both Mercury and Honda outboards which would be affected by the proposed changes. We presently employ 30 people in Sales and the Servicing of Outboard and Sterndrive boats.

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.

- Boat Evaporative Emissions – From our point of view this is a worthwhile project and should be implemented but our manufacturers will need far more time than what is being proposed for these new regulations to be implemented . These changes proposed are significant redesign changes and need time.
- 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.

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- Conventional 2 Stroke Outboards – Once again this is inevitable and desirable but must be given due time for this to happen. There are many factors to consider, boat design and suitability due to the heavier weight of 4 stroke engines. There are also many markets where lightweight engines are necessary.
- This proposal may remove several very clean engines from the market because they are slightly above the standard. These engines are averaged in for the EPA rule. These engines are 90% cleaner than the 2 stroke engines they may replace. Losing these engines from the market will reduce consumer choice and discourage some people from replacing a high emitting engine with a low emitting engine.
- Requiring Sterndrive and Inboard Engines to go to Catalysts in 2012 only gives boat builders 6 months to implement these new, larger, heavier, and more costly engines. Once again very desirable but we need time to adjust to the changes and 6 months is simply too quick

Our industry has been hit very hard by the recent economic recession and is still being hit hard right now as our products are mostly discretionary purchases. Any additional short term changes will have an enormous negative affect on an industry that is suffering heavily right now and we as a company of 45 years standing in the marine industry sincerely ask that serious consideration be given to a longer phase in period for the above positive changes.

Yours Faithfully,

Greg Nickerson
Managing Director

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