



25 July, 2010

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

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

To Whom It May Concern:

My name is Lloyd Brewer; I am the Owner/Director of Rolco Boats Pty Ltd. Rolco Boats manufacture Waterski and Wakeboard Boats in Australia. We employ approximately 20 people and use well over 100 Australian suppliers to build our boats. We have consistently produced 70 boats every year for the past few years. Rolco Boats are predominately an entry level and family boat that promotes the grass roots of the sport of waterskiing and wakeboarding, for which Australia have had world champions in every facet of the sport. Wakeboarding was one of the fastest growing sports in the world a few years ago and we have had numerous world champions in this discipline of the sport.

I am also the Owner/Director of Kincaid Marine Rolco, which is now a combination of 3 Australian family businesses being my original engine importing and reconditioning company, Kincaid Marine and Rolco Marine Conversions. As I was the leading engine supplier to both these companies it was the perfect marriage purchasing Kincaid Marine and Rolco Marine Conversions and merging all the companies into one. The purchase price was in the hundreds of thousands of dollars. Both companies have been operating for over 40 years here in Australia. Each developing waterski and wakeboard boat parts and tooling to manufacture a very comprehensive range of parts for the Australian boat manufacturers. Any body in the ski boat industry would agree that Rolco is synonymous within the ski boat industry. We have been building inboard ski boat engines for over 40 years. We employ 10 people and also use hundreds of Australia suppliers to manufacture

Rolco Boats Pty Ltd

ABN: 30 113 611 288

15 Foden Avenue, Somerton Vic 3062

Phone: 03 9308 0755 Fax: 03 9308 0877

info@rolcoboats.com.au www.rolcoboats.com.au



our parts and engines. A large part and definitely the most costly part of the tooling this company owns is to manufacture the marine conversions for the inboard waterski and wakeboard boat engine. The replacement cost of this tooling today would definitely be hundreds of thousands of dollars.

Both of my companies would be severely disadvantaged compared to fully imported boat engine manufacturers and boat manufacturers that already have engines and boats that comply with the new emission requirements.

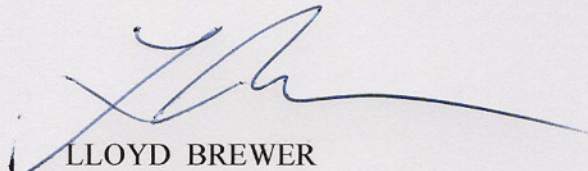
50% of our boats depend on our own engines that I would not be able to test to see if they meet the new regulations as this is a US regulation and there is no Australian test. We were the very first company in the world to marinize and offer the Gen 3 Chevrolet V8 fuel injected petrol engine to the ski boat market or any boat market for that matter. This engine has extremely low emissions (even lower than engines that do comply with current US regulations) because of its advanced technology. This new ruling would prevent me from using this engine because once again I would not have the opportunity to test it.

Both my businesses would be greatly affected if not put completely out of businesses if these new regulations come in which would affect hundreds of jobs in Australia and at the same time promoting imported goods.

I find these regulations quite severe given that recreational marine pollution is such a low percentage of the emissions and that inboard marine engines would be an extremely small part of this percentage. More importantly your report states (page 27 section 7.3) that stern drive and inboard engines were not even assessed. If they were not assessed how is it possible to impose such a strict regulation on them?

Is there any opportunity for manufacturers such as ourselves to receive funding to re-tool and then present our products for testing, so our business and supply chain can continue here in Australia?

I would appreciate being kept in the loop and being given the opportunity to attend the next meeting on this topic, seeing it could affect my livelihood severely.



LLOYD BREWER
Managing Director

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