

27TH July 2010



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SUBMISSION: REDUCING EMISSIONS FROM NON-ROAD SPARK IGNITION ENGINES AND EQUIPMENT.

The Boating Industry Association of NSW (BIA) represents all facets of commercial operation in the recreational and light commercial boating industry in NSW.

We have been engaged in discussions with industry, relevant government agencies and are aware of international marine issues on this subject.

The engine distributors in this country which form the Outboard Engine Distributors Association (OEDA) and the Australian Marine Engine Council (AMEC) are also members of BIA with manufacturers members of our Boat Manufacturers Association of NSW Division.

We are in unison in striving to be environmentally responsible across all aspects of our broad industry and have always maintained that our manufacturing standards and emission standards for marine engines cannot be a leader but of necessity follow recognised international standards. Our industry is unanimous that the appropriate international standard that should be adopted for Australia is the US EPA Standard. You would also be aware this standard has been an issue of debate for many years with aspects yet to be finalised. However there is a general acceptance that phase in times are required for industry to make the necessary adjustments for any new regulation to reduce disruption and cost.

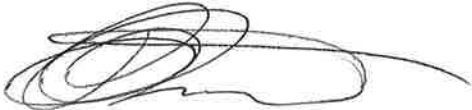
BIA is aware that OEDA and AMEC hold a different view to the introduction of regulations (2015 as opposed to 2012). Our view is that this industry consists of a vast majority of small manufacturers and dealers who are an integral part in the final delivery of the end product to consumers. We recommend for this reason that a longer lead time are required. There are many issues to be addressed in this process for both engine suppliers and boat manufacturers. The majority of our boat manufacturers are small operations and will obviously require longer lead times to adjust designs and train their dealer network in final fit out configurations for recreational boats.

We support the **OEDA RECOMMEDATION contained on page 8 of their submission:**

“ OEDA recommends a phased introduction of the regulations. OEDA also recommends before DEWHA decides on timing it establishes a select committee of Industry specialists to assist with its decision to minimise the disruption and smooth transition of the new regulations to the public, specialised groups and the industry”.

We would naturally defer to OEDA and AMEC engine and emissions expertise however, we would certainly want to nominate a representative from our boat manufacturing sector to participate on any committee established to introduce regulations and an education program for industry.

Thank you for the opportunity to present our brief comments.

A handwritten signature in black ink, appearing to read 'Roy Privett', with a stylized, looping flourish extending to the right.

ROY PRIVETT

GENERAL MANAGER