



Yorke Peninsula Marine
50 Port Rd. Kadina
SA 5554
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Project Manager
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RE: 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 Kadina and have been in business for 18 years. We are the authorized agents for Mercury and Suzuki Outboards and employ 4 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 raise regarding the implementation of such a regulation and they are outlined here.

- 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
- Many boats would have to have the transoms redesigned to suit the new regulations, boat manufacturers would need time to retool to meet the new regulations.
- I would rather see a phased introduction of these rules i.e: high polluting (0 Star) motors to be removed from importation in 2013 and 1 star motors to be removed in 2015.
- Many of our customers use small lightweight outboard motors that are easily portable, many of the low emission motors in this category are heavy and hard to lift.

- I am surprised that you have not targeted off road recreational vehicles in this report, it would appear from the report that these are causing a greater problem than recreational marine.

Our industry has been hit very hard by the recent economic recession as our products are mostly discretionary purchases. All of these requirements are adding cost to our products, in many cases thousands of dollars. We urge you to consider the above issues, and business consequences, if you go forward with a regulation.

I believe that I would be forced to evaluate the number of my employees under your proposed implementation date of 2012 with a view to reducing the number of staff I have by anywhere up to XX. This would have a profound affect on these families especially in today's market place and economic outlook.

Sincerely,

Ian Whale