



January 19, 2018

Clean Fuel Standard
Energy and Transportation Directorate
Environment and Climate Change Canada
351 St. Joseph Boulevard, 12th Floor
Gatineau, QC
K1A 0H3

Re: Clean Fuel Standard Regulatory Framework– Comments from NMMA Canada

The National Marine Manufacturers Association (NMMA) Canada is the national association representing the recreational boating industry in Canada. NMMA member companies produce more than 80 percent of the boats, engines, trailers, accessories and gear used by North American boaters. There are nearly 5000 businesses in the core of the industry from manufacturers, dealers, marinas and service providers, with the industry generating \$10 billion in revenues and a GDP of \$5.6 million. In Canada, the industry employs over 75,000 people across the country and it is estimated that approximately 12.4 million adult Canadians go boating every year.

The Canadian boating industry is supportive of sound conservation policies to protect Canada's precious lands and waterways. In this respect, NMMA Canada has actively been engaged in, and supportive of the federal government's consultations on the development of a regulatory framework on a Clean Fuel Standard. As the government now continues its consultations on the regulatory framework, NMMA Canada strongly encourages the Government of Canada to consider the drawbacks to the expansion of ethanol blends in gasoline and its potential negative impacts on boat engines and off-road vehicles.

In the United States, one of the greatest concerns facing the recreational boating industry today relates to the Renewable Fuel Standard and the introduction of E15 (15% ethanol, 85% gasoline) into the marketplace. The Environmental Protection Agency introduced E15 as an energy-saving initiative and an alternative to petroleum-based fuels. However, given ethanol actually has lower energy content than gasoline, approximately one-third more ethanol is required to travel the same distance as it would on gasoline.

Fuel with a percentage of ethanol above 10 percent in boat engines is harmful to the engines. There are serious and well-documented human safety, environmental, and technology concerns associated with ethanol blends over 10 percent in recreational boat fuel tanks and engines. NMMA has conducted a number of tests which have shown the destruction of the tank and engine.

As the federal government continues its development of a regulatory framework for a Clean Fuel Standard, NMMA asks that blends above E10 not be considered. In the event that in some instances it proceeds, labelling and separate lines at the pump (similar to Diesel) need to be implemented to ensure boat engines and other off-road vehicles do not fill up with E15.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sara Anghel".

Sara Anghel
President, National Marine Manufacturers Association Canada