



April 25, 2017

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

Re: Clean Fuels Standard – 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.

Economic Impact of Recreational Boating in Canada

- Approximately 12.4 million adult Canadians go boating every year
- Recreational boating industry has a GDP impact of \$5.6 billion
- Recreational boating industry is a significant contributor to Canada's economy with over \$10 billion in total revenues
- About 75,000 Canadians are employed by the core of the recreational boating industry
- Boaters contribute to tourism by spending \$7.4 billion while on boating trips

The boating industry is supportive of sound conservation policies to protect Canada's lands and waterways. We work closely with many federal and provincial departments to assist in developing conservation and environmental sound policies.

NMMA has been actively reviewing all of the presentation recently made about the clean fuels standard. We want to outline to the government that the expansion of ethanol blends in gasoline needs to be reviewed closely and special attention need to be given to how this will impact boat engines and off-road vehicles.

In the U.S., one of the greatest concerns facing the recreational boating industry today relates to the Renewable Fuel Standard, specifically the introduction of E15 into the marketplace. The fuel currently stocked at the majority of gas pumps (like Canada) is E10.



The EPA has introduced ethanol as an energy-saving initiative and an alternative to petroleum-based fuels. However, ethanol actually has lower energy content than gasoline. That means that about one-third more ethanol is required to travel the same distance as on gasoline.

The potential for consumers to use fuel with a percentage of ethanol above 10 percent in boat engines is detrimental to the recreational boating industry, an important economic driver for large parts of the country. 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 to prove this fact.

So as the Federal Government develops the renewable fuel policy, NMMA would like to be part of the discussion as it relates to communicating to the public the ill-effects of E15 to their off-road and boat engines before they fill up their tanks.

Thank you for the opportunity to comment.

Yours truly,

A handwritten signature in black ink that reads "Sara Anghel". The signature is written in a cursive, flowing style.

Sara Anghel
Executive Director,
NMMA Canada