



National Marine Manufacturers Association

May 13, 2022

Julie Gascon
Director General, Marine Safety and Security
Transport Canada

Dear Ms. Gascon,

The National Marine Manufacturers Canada (NMMA Canada) appreciates the opportunity to share feedback on Transport Canada's proposed options for regulating small vessel noise emissions.

NMMA Canada represents an industry that generates \$10 billion in revenues and \$5.6 billion in GDP and sustains over 75,000 jobs across the country. An estimated 12.4 million adult Canadians go boating each year, with most boat owners earning a household income of less than \$100,000. In short, recreational boating is a popular pastime enjoyed by millions of middle-class families that returns huge economic benefits to Canada.

Our industry has faced many headwinds since the start of the pandemic. Supply chain disruptions; production delays; and inflation have affected our members. As you are aware, tourism and recreational businesses were closed for months due to pandemic restrictions and border closures. On top of that, we are now facing an impending luxury tax on boats.

The Canadian marine industry supports boat noise standards and appreciates that Transport Canada is responding to calls from third-party groups to address engine noise. While most boaters take great care to limit vessel noise, we recognize that a small number pose a nuisance on Canadian waters. Marine engine manufacturers already build to a high standard of noise suppression; the problem lies with boaters who use after-market modifications that divert exhaust, e.g. Captain's Choice. That is why NMMA has long supported the enforcement of decibel limits on engine noise through the Model Noise Act, which has been adopted by a high percentage of U.S. states where engine noise had been a source of complaints. The Model Noise Act requires that:

- All above-water exhaust employ a muffler (already a requirement under the *Small Vessel Regulations* with a few exceptions);
- Noise not exceed 88-90 decibels during a stationary mode test;
- Shoreline sound levels are capped at 75 decibels for individual boats.

The European Union has taken a similar approach to regulating engine noise emissions through the Recreational Craft Directive (RCD), which NMMA also supports.

Given the above, NMMA Canada recommends that the government move forward with Option #4 (Introduce performance standards for vessel operators to follow). Imposing administrative costs and a regulatory burden on engine manufacturers and boat builders that already build to the high standards of the Model Noise Act would be illogical. The responsibility rests with the boat operator.



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In sum, NMMA Canada and the recreational marine industry support the concept of reasonable, cost-effective legislation that protects the boating environment while preserving boating privileges. We strongly support the position that all boats be equipped with exhaust silencers and that boats be operated in a safe, quiet manner. We are eager to work with the government to develop regulations that reflect these principles.

Sincerely,

A handwritten signature in black ink that reads "Sara Anghel". The signature is written in a cursive style with a large initial "S" and a stylized "A".

Sara Anghel
President
NMMA Canada