

**Proposed
Small Petrol Engines Emission Legislation
in Australia**

Euromot Position

7 November 2006

Euromot is the **European Association of Internal Combustion Engine Manufacturers**.

We represent the leading manufacturers of internal combustion engines used in a broad range of nonroad and marine applications (construction, mining and material handling equipment, trucks and buses, agricultural and forestry equipment, lawn/garden and recreational equipment, commercial marine and seagoing vessels, workboats and pleasure boats, rail traction, power generation).

Euromot has been working for many years with international regulatory bodies, e.g. European Union, the UN Economic Commission for Europe (UNECE), the UN International Maritime Organizations (IMO) and the Central Commission for the Navigation on the Rhine (CCNR). In addition, we are seeking an open and fair dialogue with national governments to provide reliable know-how on advanced internal combustion engine technologies in general and, in particular, on the feasibility of environmental as well as cost-effective product regulations. To achieve a pro-active engagement of all stakeholders in international harmonisation of regulations affecting engines and equipment, we coordinate our activities worldwide (USA & Canada, China, India, Japan) with trade associations of the nonroad and marine industry sector.

For further information about our Association please pay us a virtual visit at <http://www.euromot.org> – your bookmark for engine power worldwide.

Environmental Link presented in September the first draft report and recommendations for a forthcoming Australian emission legislation (*given in italics below*).

From a Euromot perspective, Australia should adopt the world leading and most practical EPA emission legislation. This legislation has proven to be practical and reliable. EPA legislation combines a high level of environmental protection with the needs of the customer, authorities and manufacturer.

Euromot strongly request modifications to the proposal, which have been discussed and agreed upon amongst member companies at the associations meeting on 31st of October in Frankfurt am Main, Germany.

In particular our comments and requests are as follows:

- 1** *Mandatory air pollutant emission standards to be introduced in Australia for all outdoor equipment (<19kW) powered by spark-ignition engines.*

Euromot fully supports the introduction of a mandatory emission regulation for small spark ignition engines.

- 2** *Proposed standards to mirror US EPA regulations (compliance with equivalent EU regulations also acceptable).*

Euromot fully agrees with that proposal. There should be no certification required for engines labelled as compliant with either the U.S. EPA or EU regulations. Compliance documentation from either the U.S. EPA or Europe should be adequate proof of conformity.

- 3** *Timing*

(a) US EPA Phase 1 – Effective from 2007 / 2008

Euromot believes that 2008 is a realistic introduction date

(b) US EPA Phase 2 – Fully implemented in 2012 (in step with 2007 USEPA limits) with phase-in period and/or ABT over 2008-2012 to provide for early introduction of cleaner product.

Euromot strongly recommends to implement ABT according to the Canadian model. The manufacturers will run the certification and provide a balanced ABT scheme

- 4** *Walk-behind 2-stroke mowers to be included in US EPA Category 5 (>50cc) product classifications. Implementation timing to be as in Recommendation 3 above.*

Euromot disagrees with this position as it would open up the market for low price, high emitting lawn mowers. We alternatively recommend a 2-3 years delay of the implementation for 2-stroke lawn mowers that are produced by Australian based companies.

- 5** *All products also to be certified to relevant EPA durability categories.*

Euromot fully agrees with that proposal.

6 *Subject to further review, ABT (if included) may be phased out after 2012.*

Euromot strongly recommends to continue an ABT scheme after 2012. It should be kept as a compliance tool as it provides technical and economical benefits for small engine manufacturers such as:

- ABT is an important part of EPA emission legislation, giving the manufacturer the flexibility to produce the best and cost effective products for the customer, resulting in low price and well engineered products. Without ABT it is not possible to introduce US-models one to one to the Australian market. Thus US products would have to be modified resulting in higher costs but not in a better protection of the environment.
- ABT is giving the legislator a full transparency of the market and a full set of emission data and thereby a permanent update of an emission inventory. Compiling the data will be done by the manufacturers and can be easily controlled by authorities.
- ABT has proven within the US and in Canada that manufacturers are forced to introduce products with emissions below the current emission standard in order to bank credits. The banked credits are needed for unforeseen market shifts, such as dry summers or other circumstances.

Frankfurt M. / 2006-11-07

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