Good morning, my name is Nicole Vasilaros and I am Senior Vice President of Government and Legal Affairs with the National Marine Manufacturers Association, representing 1,300 recreational boat, engine, and accessory manufacturers. Our members collectively produce more than 80 percent of the recreational marine products sold in the United States with a total economic impact of $170 billion annually. The U.S. marine manufacturing industry is comprised of nearly 35,000 businesses that support nearly 700,000 jobs.

NMMA opposes EPA’s proposed rule to allow for year-round sale of E15. If finalized, year-round sale will exacerbate the existing financial and safety implications for millions of consumers and their engine products. This action is based on questionable statutory authority and without regard to the consumer impact.

Marine engines are designed, calibrated, and certified by EPA to operate on blends of gasoline up to 10 percent ethanol by volume and federally prohibited from operating on E15. If finalized, this rulemaking would double down on failed government policy that has bifurcated the fuel supply, while increasing the availability of a fuel harmful to millions of marine and other consumer products during the height of the summer boating season.

Each year 142 million recreational boaters take to the water in about 12 million registered boats, consuming about 2.3 billion gallons of gasoline. Considering 95 percent of boats are small, towable vessels filled at local gas stations across the country, expanding the availability of E15 will unnecessarily put the bulk of the recreational boating community at greater risk of misfuelling.

A recent Harris Poll conducted on behalf of the Outdoor Power Equipment Institute (OPEI) shows misfuelling is on the rise, with more than 3 in 5 Americans mistakenly assuming that any gas sold at gas stations is safe for all of their products. The same survey also found that:

- Less than 2 in 5 Americans know higher ethanol blends are harmful to engines such as those in boats, mowers, chainsaws, snow mobiles, generators, and other engine products;
- Nearly 4 in 5 Americans are unaware that it is illegal to put anything higher than 10 percent ethanol into these products;
- Only 1 in 5 Americans say they notice the ethanol content at the gas pump; and
- 9 in 10 Americans believe the government must do more to protect consumers from the dangers of E15.

When it comes to the debate about allowing year-round sale of E15, consumers aren’t even an afterthought, they are being completely ignored. To underscore this point, NMMA has documented countless examples of missing, hidden, or destroyed ethanol warning labels at local gas stations across the country, and we’re more than happy to share them with everyone after this call. As evidenced by the Harris poll, consumers lack basic awareness of E15, proving the failure of the current label.

Compounding the ineffective label—consumers are being duped by clever fuel marketing strategies, promoting E15 as “Unleaded 88” fuel, which contains 15 percent ethanol but is only labeled as 88 octane gasoline. Although pumps dispensing “Unleaded 88” also carry the current E15 warning label, the
average consumer will not associate an E15 label with Unleaded 88, greatly increasing the risk of misfuelling. Changes to fuel marketing strategies like this only add to consumer confusion about appropriate fuels for their vehicles and engines and merit careful review by EPA.

We are not fighting against year-round E15 sales for mere pleasure. We oppose this reckless proposal because E15 destroys boat engines – not to mention engines in countless other consumer products – and the federal government has been negligent in its responsibility to effectively protect consumers from a fuel deemed so dangerous they are federally prohibited from using. Plus, it’s terrible for the environment, and increased corn production for the purpose of making ethanol leads to worse outbreaks of harmful algae blooms – adding insult to injury to the recreational boating and fishing community. These are facts, plain and simple.

Instead of barreling towards implementing a policy that almost nobody likes, save for a politically connected and influential constituency, EPA should focus on protecting consumers from misfuelling – including better labeling and stronger safeguards at the pump – and our environment.

Year-round E15 sales is bad for consumers, the environment, and the country, and it should not move forward. And at the very least, EPA should not proceed until more robust consumer education and misfuelling protections are reviewed and in place.