DATE: July 15, 2016

TO: Boat Manufacturers Division Board of Directors

 Boat Manufacturers Division Members

FROM: John McKnight, Senior Vice President Government Relations

 Rob Newsome, Vice President Engineering Standards

RE: Boat Manufacturing Residual Risk Regulations Information Collection Request

NMMA has begun discussions with EPA staff and their contractor and they moving quickly with plans to draft Residual Risk regulations for boat builders. So far NMMA has received and is currently reviewing the draft Information Collection Request (ICR) that will be sent out to a select number of boat builders for them to complete. EPA will then use this survey and other information to develop a proposed regulation. This survey will only be sent to 12 boat manufacturers, but these manufacturers may have multiple plants. If you receive an ICR please let me know. EPA plans to begin sending these requests out by August 1st. Attached is a copy of the draft RTR survey along with the Residual Risk memo that NMMA sent to boat builders on May 1, 2016.

As NMMA does with all major government regulatory efforts we are starting a Residual Risk Task Force to provide both information and solicit direction from boat builders. These rulemakings from the ICR to proposed rule to final rule can take many years. If you wish to be part of this task force or assign a person to this task force, please send the contact information to John McKnight at jmcknight@nmma.org.