



## National Association of Boat Owners

***This response contains the comments and evidence provided by The National Association of Boat Owners (NABO) in June 2011 for the Department for Transport Consultation on the implementation of the transport elements of the Renewable Energy Directive***

***The National Association of Boat Owners is dedicated to promoting the interests of private boaters on Britain's canals, rivers and lakes. NABO was formed in 1991 and represents over 3000 boaters predominantly on the waterways operated by British Waterways and the Environment Agency. Views of members are obtained through correspondence, Association publications, surveys, open meetings, and face to face contact with boaters at boat shows and on the waterways.***

***The structure of the response does not follow the questions asked in the consultation documents, as these are, to a large extent, not related to user's needs.***

***NABO wish to express their appreciation for the opportunity to contribute to the consultation.***

***Should DfT wish to discuss this response, the following contact should be used***

***Chair David Fletcher [nabochair@nabo.org.uk](mailto:nabochair@nabo.org.uk)***

NABO's concern is the for the usage of diesel for NRMM on inland waterways and the amount of bio or FAME content that can be tolerated without reliability issues rendering the fuel unsuitable. This may appear in the form of issues relating to storage or equipment failure. Inland waterways are a special case which is uniquely vulnerable to reliability of bio diesel use, and the consequences of failure are particularly severe.

### The fuel market

The current flexible rules for FAME content has resulted in an unpredictable fuel supply market on the waterways. Some suppliers have provided FAME free fuel whilst others have dyed road quality fuel. Staff if questioned may not know what they are selling. The boater customers are confused, and unable to have confidence in the fuel they are buying, and make judgments on issues around storage and suitability of their equipment. As a result there is no consistent boating experience as to the behaviour of red diesel with a bio content. Matters such as reliability of suppliers, use of additives, equipment suitability and guarantees, buying patterns and storage improvements all need to be considered.

Boaters are unprepared for a change to fuel with a significant bio content. This is evidenced by a growing number of breakdowns associated with the diesel bug. NABO fears that this trend will increase and in due course this will put boaters and their families at some risk. They will also incur significant costs for repairs and cleaning.

#### Engines and heaters

Many inland waterways boats use marinised engines that can date back for many decades. Engine makers are not able to provide advice on the use of bio fuels, so boaters are very much left to their own devices and shared experience. Some engine suppliers will only guarantee their new engines with up to 5% FAME in fuel. Use of fuel in heating system is popular and there is conflicting advice on best practice and suitability of the fuel and additives needed.

#### Narrowboat design

Typical inland waterways canal narrowboats carry 200/300 litres of fuel held in a tank welded into the hull of the steel boat, without clean out access or low point drains. Common practice based on long experience is to fill up at the end of the boating season to prevent condensation forming during winter. Many boats use less than a tank full per season, so there is a high incidence of low turnover in the tanks and long storage periods. It is impractical to make the tanks smaller and it is impossible to clean out the tank by manual means. The Boat Safety Scheme rules (to which all boats must comply) for fuel storage are very specific and strict as to the construction of storage tanks. All this makes the storage very vulnerable to condensation and diesel bug growth and there are no easy solutions. Fuel with FAME content and vulnerability to condensation makes diesel bug growth very likely if not inevitable.

#### Navigation risks

Fuel failures due to diesel bug attacks are serious events, as they always result in loss of power or engine failure, and have the great potential to put lives at risk due to navigation incidents. Boaters are very concerned that a step change in the use of bio fuels will result in boating accidents involving collision, or being swept onto weirs and bridges. This implies serious damage to boats, emergency service call outs and the potential of loss of life.

#### Tank clean out costs

The clean out costs are implied as minor in the consultation. NABO does not agree with this assessment. It should be understood that boat breakdown is very different from road transport breakdown, and access to repair facilities is much more difficult, and consequential costs large. To clean a tank and fuel system could involve a lengthy tow to a repair point taking many days, the cost of cleaning, and also the consequential time loss of the use of the boat, alternative accommodation and transport etc. These costs are very significant and a serious threat to private owners and hire boat operators alike. It is very likely that a boater faced with large volumes of infected diesel will attempt less than ideal methods to clean the tank and this will result in spillage and therefore safety and environmental incidents.

### Boating carbon footprint

Boating is already a very low carbon footprint leisure and residential lifestyle option. We draw your attention to web sites such as <http://www.boatcarbonfootprint.com/> and <http://www.telegraph.co.uk/earth/greenerliving/3526321/Canal-boat-living-Rise-of-the-eco-river-gipsy.html>

Boaters already make a significant contribution to GHG savings. It is unreasonable that they should be required to contribute further in an arbitrary and unproven manner just because they use fuel similar to that for other NRMM categories. They should not be required to disproportionately bear risks and costs of the use of bio fuels. NABO is very supportive of GHG initiatives. But they do have to be underwritten by evidence that they are based on sound technology and that they will work in the specific waterway environment. The consultation document does not offer this specific evidence.

### Summary

As a result of the forgoing, it is impossible today to be confident of the reliability and suitability of the use of FAME in red diesel for use on the inland waterway. Boaters need stability with a consistent fuel with a low and non-critical bio content so that they can learn over several years what is required to handle the fuel. NABO strongly objects to new legislation that imposes high FAME content fuels that are unproven in the unique inland waterway market. This has to be established over time with reliable fuel supplies, supportive equipment manufacturers, experience on best practice for storage, and adequate facilities for repairs. None of these are yet in place.

NABO requests that at this time, the inland waterway market be exempted from the use of fuels with a bio content of more than the current target of 3.5%.

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