

were in fact contributing to our nation's waterways. After an exhaustive nationwide survey, the NASBLA Pollution Committee concluded that pollution from recreational boats was negligible in virtually all waters. A few specific congested mooring areas in stagnant waters were the only exceptions. The Committee further found that less than 10% of the nation's recreational fleet is equipped with marine toilets.

Although pollution from pleasure craft was not found to be a problem, the Committee realized it could become one in some areas as boating increased, and that the lack of a problem would not necessarily forestall a host of non-uniform legislative "solutions." As a result, the Committee recommended, and NASBLA adopted, a Model Act on Sewage Disposal and Littering from Vessels as a guide for jurisdictions which felt regulation necessary. (See Exhibit B.) The recommended Model Act has since been followed by several key boating states, including New York, Tennessee, Georgia, and North Carolina, and more states are expected to follow suit very soon.

The NASBLA Act prohibits untreated sewage discharges into the waters, but allows toilet use with chemical treatment devices meeting certain effluent standards, incineration or holding tanks. Just what a recommended minimum treatment standard should be has been studied at length by the National Sanitation Foundation of Ann Arbor, Michigan. This non-profit testing laboratory was assisted in this work by State and Federal health officers, the people who have the final say on acceptability of treatment devices in their respective jurisdictions.

In May of 1966, at Ann Arbor, Michigan, the National Conference on Watercraft Waste Disposal was held under the sponsorship of the National Sanitation Foundation, in cooperation with the U.S. Public Health Service and the Tennessee Valley Authority. Its objective was to review effluent criteria recommended by the Interdepartmental Committee on Sewage and Waste Disposal from vessels (established by the Division of Environmental Engineering of the Public Health Service) as they apply to pleasure craft. Another objective was the establishment of criteria for evaluating the performance of devices designed to treat wastes and render them acceptable for discharge from pleasure craft in accordance with the effluent criteria just mentioned.

This Conference was participated in by competent authorities representing state and federal Public Health agencies, state and federal Water Pollution Control bodies, marine and yachting organizations, and a number of manufacturers of devices that treat, retain or otherwise manage sewage produced in watercraft.

It was from that conference that the Joint Committee for Watercraft Waste Disposal Devices was formed. That Committee and its sub-committees evolved the present National Sanitation Foundation Standard. (Exhibit C.)

Endorsement of the NASBLA Model Act, implemented by the Sanitation Foundation's uniform performance standards for watercraft sewage treatment devices, has come from many quarters. In addition to the Outboard Boating Club of America, the National Boating Federation, a national organization of state boating clubs, is in favor of the approach. So is the National Conference of State Sanitary Engineers. Regrettably, this apparently is not the approach taken to date by the Federal Government. Two study reports of vessel discharges were recently prepared by the Secretary of the Interior through the Federal Water Pollution Control Administration—one for the Congress and one for the President. Boaters believe the data presented and the recommendations made in these studies are highly unrealistic. For example, the "studies" say that 1.3 million of the 8 million motorboats, sailboats, canoes and rowboats in the country are equipped with marine toilets. That's one out of every six boats! Yet, a recent survey asking all marine toilet manufacturers how many units they had produced since they were in business indicated total production of all marine toilet manufacturers combined to be only 500,000 to 700,000 units. Even if every unit were still in use, which is highly improbable, total production over the years has amounted to only half of what the FWPCA report claims are in use.

Clearly, the FWPCA researchers did not consult the National Association of State Boating Law Administrators, or the NASBLA Pollution Committee, or even knowledgeable boatmen when they came up with the breakdowns on the number and types of recreational craft equipped with marine toilets. The report says 90 percent of all inboard boats, 80 percent of all outboard boats over 16.5 feet in length and 50 percent of all sailboats without auxiliary power have toilets. For 1966, marine industry sales records show that 81 percent of all sailboats sold without auxiliary power were 15 feet or under, and about one third of these