

performance oriented and spell out that which is to be accomplished by the respective devices. An appropriate coliform bacteria count for the effluent of the chemical-macerator device is specified. Safety standards for the installation, operation and electrical equipment of the devices are incorporated either directly or by reference. The standard is used by many agencies at both the State and National level as the basis for legislation and/or testing of proprietary devices.

The A-8 Committee is making every effort to coordinate their work with the National Sanitation Foundation which has recently decided to develop a separate standard on Pollution Control Devices for Watercraft. In fact, a joint meeting of the two Committees has been scheduled by the Chairman of the A-8 Committee for Tuesday, April 23, 1968, at the ABYC office.

The Council maintains itself in an ethical and broad-based form so that its standards can be useful to governmental and regulatory bodies, and so that the boating industry can truly regulate itself. We cooperate wholeheartedly with the Yacht Safety Bureau, and support the proper testing procedures as performed by them.

The American Boat and Yacht Council stands ready to assist this Committee and the various Departments involved in establishing safety standards for the control of pollution from vessels using the navigable waters of the United States. The Council's standards can be incorporated directly or indirectly into the final regulations—directly by copying the standard word for word; indirectly by making reference to the A-8 Standard, where compliance with that standard would meet the requirements of the regulation. The advantage of the latter method would be that the regulation would always be up-to-date and dynamic to meet the needs of safety and provide for new devices as they are invented or developed.

In giving consideration to proposed Senate Bill No. 2525, we respectfully suggest that this Committee make haste slowly. We believe that in this area which is evidenced to be in a great state of flux, that precipitate action has proved costly in terms of time, tempers and trouble. We would call your attention to a situation in Chicago reported in the Philadelphia Sunday Bulletin of March 24, 1968. In that area, an ordinance forbidding discharge into Lake Michigan of effluent from waste treatment devices not complying with certain standards seems logical on the surface, but as noted in the article, a copy of which is appended, no standards have been set and no provisions made for alternatives. A similar situation developed in the Province of Ontario where a similar law intending to require retention devices on pleasure craft was found to be unworkable since there were no shore-side facilities for relieving the contents of the holding tanks.

We suggest as an alternative to S. 2525 serious and careful study of the actions already being taken by several of the states. Leading in this analysis and development are the states of New York, New Hampshire and Minnesota. Other states have pollution control laws in effect or are considering the same. It would seem that this Committee and/or the Federal Government in general could do this country a great service by helping to promote uniformity but allowing the detailed control and enforcement to be handled at the State level.

The attention of the Committee is called to certain questions raised by Document No. 48, a report entitled, "Wastes from Watercraft." In this report a great many allegations are made and conclusions reached relative to pollution from recreational boats without any significant research being indicated on which to base these conclusions and allegations. For example, it is said that "pleasure craft . . . may suddenly impose a load of untreated wastes . . ." ". . . a flotilla of recreational watercraft . . . can easily contaminate shell fish beds . . ." No specific examples are given nor unfavorable experience reported. Great emphasis is put on the numbers of persons involved in recreational boat use, but no recognition is given to the fact that this number of persons and this amount of usage is spread over thousands of miles of waterways in the United States.

Because of this lack of concentration, we feel that the contamination due to recreational watercraft is considerably less significant than is indicated by all of the attention it has received. As a measure of the amount of contamination, reference is made to an article from Marine Technology, a publication of the Society of Naval Architects and Marine Engineers, in its October, 1967, issue entitled "Sewage Pollution from River Tow Boats." Although the figures quoted have to do with tow boats on the major inland rivers, the number of persons involved both on a per boat basis and in total are comparable to those of recreational craft. By determining the amount of sewage discharged per boat per day