

This document was sent to us by the American Canoe Association on October 1, 2002. It was handed out at a meeting where ACA presented *Hostile Waters* in summer 2002. As of October 15, 2002 it was not posted on the Personal Watercraft Industry Association website at [www.pwia.org](http://www.pwia.org).



**PERSONAL WATERCRAFT INDUSTRY ASSOCIATION**

## **Personal Watercraft Industry Association Responds to American Canoe Association Accusations: *Just the Facts***

*For more information, please call 202-721-1621, or email [info@pwia.org](mailto:info@pwia.org).*

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### ***Personal Watercraft Headlines (May-August 2002)***

#### **WATER-SCOOTER SOLUTION**

Boating education has become priority for personal watercraft

#### **Personal watercraft restrictions loosened**

Florida Fish & Wildlife Conservation Commission films personal watercraft safe operation video

PWIA seeks a seat at Rhode Island's regulatory table

Jet Ski lobby: let's talk

Jet-skis touted as eco-friendly

Lifeguards looking to get motorized; Personal watercraft from loan program to be used at state beaches; city's crew also applying

**NOISE COULD BE CUT WITHOUT BAN ON SCOOTERS**

**Ride on! Despite controversy and bans, personal watercraft can be a fun way to take in the ocean**

New 4-stroke is environment-friendly

#### **PERSONAL WATERCRAFT TO ASSIST OSWEGO POLICE EFFORTS**

Police get jet ski

**SHARING THE WATER IS KEY ON A PWC; PERSONAL WATERCRAFT, IF OPERATED SAFELY, CAN RAISE ANYONE'S PULSE.**

New PWC rules take effect in Iowa

New watercraft law takes effect; Sheriff reflects on few 'Jet Ski' problems at lake City using jet skis on river

Sierra Club Supports Keeping Public Lands Open to All Americans

The quiet storm; 4-stroke wet bikes are the newest development in the evolution of personal watercraft

**NEW JET-SKIS AID WATER RESCUES**

*Will ride for food; Wave rider helps starving children*

Woman Uses Personal Watercraft

To Help Rescue Stranded Boat Passengers

**CRACK DOWN ON RECKLESS OPERATORS, BUT DON'T BAN JET SKIS**

**Environmentalists forced personal watercraft ban on lakes Mead and Mohave**

69 personal watercraft embark on charity ride

Closures of Lakes Mead, Mohave and Powell to personal watercraft could affect local economy

## ***ACA misinterprets the statistics***

The ACA document ignores the fact that **the available accident data can be misleading** because, as the Coast Guard reports in its 2000 Boating Statistics, "only a small fraction of nonfatal boating accidents occurring in the United States are reported to the Coast Guard, State or local law enforcement agencies," and "**Nonfatal accidents cannot be assumed to have occurred in numbers proportional to the reported statistics because the act of reporting an accident is not a random sampling of accidents in the statistical sense.**"

A new report published this summer by the Massachusetts Office of Coastal Zone Management and the NOAA Coastal Services Center concludes, "**there is little data or evidence to suggest that PWC are inherently more dangerous than other recreational vessels.**"

## ***PWIA agrees with several ACA recommendations***

PWIA encourages every state to adopt a minimum age of 16 to operate a personal watercraft (18 to rent), use only during daylight hours, the establishment of no-wake zones, and strict enforcement of boating safety and navigation laws. (Our model legislation is available at <http://www.pwia.org/modelbill.html>.)

## ***PWC are motorboats***

**There is no rational basis for singling out personal watercraft for restrictions and bans that do not apply to other motorboats.** The Personal Watercraft Industry Association has long supported the view that **there are some waterways that, for environmental or other reasons, are inappropriate for use by any motorboats or certain powerboating activities.** However, PWIA opposes wholesale elimination or restriction of personal watercraft (PWC) from some waters when similar boating activities are allowed. The sound, speed and maneuverability traits attributed to PWC are also inherent to other vessels.

## ***All boats have safety issues***

**Numerous canoeists are rescued every year by PWC operators, including law enforcement personnel riding the 13,000 PWC loaned over the years by PWC manufacturers.**

The American Canoe Association's priority should be encouraging the use of personal flotation devices by its members. According to U.S. Coast Guard statistics, 15 percent of boating fatalities in 2000 were canoeists and kayakers. These statistics show that the biggest safety threat to canoeists is their own disregard of boating safety guidelines.

## ***Ninety-nine percent of PWC are operated accident-free***

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Personal watercraft manufacturers are committed to providing their customers with a safe and fun recreational boating experience, and according to U.S. Coast Guard statistics, **more than 99 percent of personal watercraft are operated accident-free each year.** Unfortunately, a few discourteous operators can give responsible operators a bad reputation. You don't ban cars because of drunk drivers. With strict enforcement and more education, the DUI situation has become manageable, and the same thing has occurred with unsafe PWC operators.

An educated boater is a safe boater, and **PWIA continues to actively advocate for mandatory boating education for personal watercraft users.** The Coast Guard found that in the year 2000, nearly 70 percent of *all* reported boating accidents involved operator controllable factors, and 84 percent of boat operators involved in accidents had not taken a boating safety course.

According to Coast Guard statistics, **PWC accident, injury and death rates have seen no significant statistical increase since 1987.** In fact, PWC accidents have been reduced by 17 percent since 1997, while boating accidents across the board have only decreased by 0.19 percent. The number of PWC collisions with open motorboats has decreased by 47% since 1997. Over that same time period, PWC-related injuries have been reduced by 11 percent while fatalities have dropped 21 percent.

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**Personal watercraft accidents are probably reported much more often than other boat accidents,** because among other things they are rented more often than other boats and rental operators report most accidents for insurance and product liability reasons. Additionally, PWC are often "shared" by a number of users during the course of an outing, therefore increasing the average riding time for a single PWC as compared to other types of vessels. Thus, **it is impossible to compare accident rates among different boat types; the data are just not there.**



## ***PWIA supports strict law enforcement***

The PWC industry supports strict enforcement of navigation and safety laws, as well as mandatory boating safety education for all operators of personal watercraft. If there is a problem with operator behavior, then that is an education and a law enforcement problem.

**Personal watercraft manufacturers have loaned more than 13,000 personal watercraft to law enforcement agencies for on-water patrols and search and rescue activities, and PWIA offers free rental safety kits to personal watercraft rental businesses.**

PWIA is eager to work with law enforcement groups. The PWC industry has long worked actively with the U.S. Coast Guard, U.S. Army Corps of Engineers, the Safe Boating Council, and the National Association of State Boating Law Administrators on a variety of education and safety initiatives throughout the country.

Surveys have found that the most common ways PWC are used (over 80 percent) involve rides with family and friends, short cruises, towing skiers, exploring, and entertaining friends. The majority of PWC owners do not race or perform aggressive maneuvers during their typical rides—in fact, in a 1996 survey by Bowe Marketing Research Consultants, less than one percent of respondents listed racing around buoys as a typical activity.

All members of the PWIA pledge to do their part to educate customers and support law enforcement. **Education and enforcement are the keys to reducing accidents and solving waterway-use conflicts.** The PWIA is open to other solutions as long as the access rights of PWC riders are respected and PWC are treated equally to other forms of recreational motorboating.

## ***Advertising***

The ACA's criticism of boating industry advertising is a distraction. Personal watercraft advertisements never depict illegal or unsafe activities by the professional riders featured in the ads. ACA does not document the years the advertisements it features were run, but many of today's personal watercraft ads show whole families responsibly enjoying four-person vessels.

Advertising is a form of entertainment. **Advertising of anything is designed to sell products, not to influence behavior after the customer leaves the store.** Automobile ads show cars speeding around curves and climbing steep mountains, which consumers recognize is not something they will emulate.

"I wish all consumers were as gullible as advertising's biggest critics. Anyone who believes advertising is that powerful will believe almost anything." - *Jef I. Richards (1995), advertising professor, The University of Texas at Austin.*

"People are very sophisticated about advertising now. You have to entertain them. You have to present a product honestly and with a tremendous amount of pizzazz and flair, the way it's done in a James Bond movie. But you can't run the same ad over and over again. You have to change your approach constantly to keep on getting their attention..." - *Mary Wells Lawrence, quoted in Newsweek, October 1966.*

"If there are signs that Americans bow to the gods of advertising, there are equally indications that people find the gods ridiculous. It is part of the popular culture that advertisements are silly." - *Michael Schudson, Advertising, The Uneasy Persuasion: Its Dubious Impact on American Society, 1984, New York: Basic Books, p. 227.*



## ***Modern personal watercraft are environmentally-friendly***

The EPA has never singled out PWC engines. PWC are subject to the same regulations affecting all 2-stroke marine engines, including outboards.

Modern PWCs use "new technology" 4-stroke, Direct-Injection 2-stroke or catalyst-equipped 2-stroke marine engines. **Current PWC models already meet EPA's 2006 guidelines for reducing emissions by 75 percent from 1998 models.**

MTBE, toluene, xylene, and acetone/hexane are a byproduct of the gasoline burned in all engines, not just PWC. According to the EPA, the major source of these chemicals is seepage from underground storage tanks.

**Outboard engines and personal watercraft engines operated at the same power level emit similar amounts of exhaust emissions.** Although the exhaust of a conventional 2-stroke outboard or PWC contains some unburned fuel, it is at a temperature of several hundred degrees and is expelled in a narrow trail of exhaust behind the boat as it travels through the water. As this "tail" of exhaust leaves the hub of the propeller, it quickly rises to the surface where it is released into the atmosphere. At idle and off idle conditions, outboard motors are designed to emit exhaust through their "exhaust relief system" above the water. Under these operating conditions, they discharge little or no exhaust into the water.

Several studies, conducted for the U.S. EPA in the 1970s, attempted to quantify the amount of hydrocarbons deposited into the water by conventional 2-stroke outboard motors. Because of experimental difficulties associated with these types of tests, the results of these studies vary. They all indicate, however, that **only a fraction of the gasoline used by the engine (somewhere between 1-10%) is deposited in the water, and that that small amount of gasoline immediately begins to volatilize from the water into the air.** The scientific data indicates clearly that although 20-25% of the fuel consumed by an outboard bypasses the combustion process and exits the exhaust, only a fraction goes into the water. Trying to characterize unburned gasoline discharges from the operation of an outboard or PWC as dumping liquid gasoline into the water is not only unfair and misleading, but also scientifically incorrect.

Every independent scientific sound study conducted has shown that PWC are no louder than other forms of motorized boating. In many cases PWC are significantly quieter, and PWC manufacturers have made a 70% reduction in sound levels since 1998. **All PWC operate well within federal and state noise regulations.** Improper operation of personal watercraft can lead to sound disturbances, such as operating too close to a shoreline. **PWIA and its members support the establishment and enforcement of slow-speed/no-wake zones near shore for all boats.**

***Responsible PWC use does not cause any more significant wildlife impacts than other forms of human activity***

Personal watercraft are often accused of disturbing wildlife in shallow areas, but the truth is that every personal watercraft carries a sticker warning users to avoid operating in very shallow waters, or risk engine damage that would leave the user stranded and with an expensive repair bill. Many other boat designs, including kayaks and canoes, are able to access shallow areas.

Personal watercraft have no greater significant impact on waterfowl than other motorized boats, according to a series of studies by the Florida Fish and Wildlife Conservation Commission. It is actually the loss of nesting habitat, increased human interaction and increased predation by urban animals such as raccoons that have led to the decrease of the many populations of birds around the country. In terms of mortality, there are very few reports of waterfowl death directly from motorboats, and no studies cite it for personal watercraft.

From an environmental standpoint, PWC have significantly less impact than many other motorboats. In fact, the design of PWC gives them many environmental advantages over other types of motorboats. Because personal watercraft are jet-powered, they have minimal impact on seagrasses, marine mammals, fish and other aquatic life.

**The unique design and lack of an exposed propeller make personal watercraft the vessel of choice for organizations that research and rescue marine mammals.**

Personal watercraft are small, very maneuverable and jet-propelled, thus they are able to come directly up to rescue an injured dolphin or other marine mammal without risk of prop scarring. Organizations such as Sea World (Florida and California) and the Harbor Branch Oceanographic Institute (Florida), utilize personal watercraft on a regular basis. Researchers with the Dolphin Field School have also found personal watercraft to be useful tools for observing Atlantic bottlenose dolphins.

PWIA is concerned about sustaining and conserving our natural resources, and supports reasonable regulations that protect wildlife from all forms of human disturbance, including all forms of motorized and non-motorized boating.