

Chair and Members

Infrastructure and Environment Committee

City of Toronto

100 Queen Street West

Toronto, ON M5H 2N2

RE: IE28.12 - Review of Highly Polluting Personal Watercraft

Dear Chair and Committee Members,

Jetti Inc. is a Toronto-based PWC rental operator engaged with the City’s multi-party working group under Council directive 2025.MM33.20. We served over 1,850 riders in 2025 with zero customer injuries, performed three third-party water rescues, and carry comprehensive insurance. We welcome Councillor Saxe’s interest in the environmental impact of watercrafts and write to offer our industry experience as context to assist the Committee.

Modern, Commercial PWC’s Have Advanced Significantly in Emission Performance

IE 28.12 references pollution from “jet skis and two-stroke boat engines.” We respectfully note that two-stroke PWC’s are a dated technology, with no manufacturer producing them in over 20 years. Jetti’s fleet uses the Rotax 1630 ACE—as advance four-stroke, fuel-injected engine with a closed-loop cooling system. Zero petroleum is discharged into the water. Hydrocarbon emissions are **97% lower** than the two-stroke engines referenced in the letter. For comparison:

Vessel Type	HC+NOx (g/kWh)	Fuel to Water	CO ₂ /hr (lbs)	Fuel (GPH)	vs. Modern PWC
Jetti Fleet (GTX Pro 130)	15–20	0%	~88	4–5	Baseline
Old 2-Stroke PWC (pre-2002)	150–680	20–30%	~70	5–8	10–40x HC
40’ Cabin Cruiser	Varies	Minimal	~390	15–25	4–5x CO ₂
50+’ Yacht	Varies	Minimal	~780+	30–50+	8–20x CO ₂

Sources: U.S. EPA; California ARB; NMMA. All recreational boating accounts for just 0.7% of transportation-sector GHG emissions.

Commitment to Electric Transition

Jetti has committed to transitioning to an all-electric fleet once the technology is commercially viable and charging infrastructure exists. No electric PWC currently meets the range and durability requirements for commercial fleet use (8–10 hrs/day on open water), but we are actively monitoring the market and welcome transition milestones in any licensing framework. We would also welcome partnering with the City on waterfront charging infrastructure as the technology matures.

Waterfront Equity

Personal watercraft are the most affordable form of motorized water recreation in Toronto. A rental costs ~\$150/hour; a used PWC costs \$5,000–\$15,000. Boat ownership and club membership require \$30,000–\$500,000+. A policy restricting PWC access on City-managed waterfront—while extending 20-year leases to 24 private boat clubs—would disproportionately affect working- and middle-class families, including many marginalized communities who are among our most enthusiastic customers.

We support a comprehensive, evidence-based environmental study of **all** motorized watercraft on City-managed waterfront—not only PWCs—and respectfully request the opportunity to depute before the Committee.

Respectfully submitted,

Raj Mehta

Chief Executive Officer, Jetti Inc.