

Time Consultation Mail In **Query**

In sum:

For road safety reasons, the following would be optimal, in order of preference from best to worst.

1. reverting to GMT (aka old time or winter time) all year round.
2. the status quo (fall back, spring forward)
3. extension of BST (aka summer time) all year round.

On the whole, I'm of the opinion that it shouldn't matter much whether the Republic has a different time-zone to the North or to Britain, but have no strong opinion either way on whether we should do as Britain does, or not.

FIRSTLY:

There appears to be a prevailing presumption among many (if not most) that if we stop the twice-yearly change, that we should stick to 'summer time' (BST). This presumption appears to reflect the desire that we put an end to darker evenings, and this may even be related to a more visceral or deeper desire to have summer all year long.

Sadly for many, we cannot just wish winter away. If we make winter evenings brighter by one hour, the inevitable consequence of the other end of the balance sheet is that we have to make winter mornings an hour darker. Effectively, this means that sunrise would go from 8.15am at the end of October, to about 9.30am for most of December and January - peaking in lateness at about 9.40am in late December and early January.

We cannot cheat such a basic element of nature..we cannot magically make an extra hour of brightness in the evening appear from nowhere.

ROAD SAFETY

General:

Extending BST to all year round would increase the safety risks for all travellers caused by ice on the roads in winter. The mirrored effects in the evening are rarely the case. This would adversely impact on the safety of all road-users, including pedestrians of all ages and abilities, cyclists, and drivers.

The cumulative effect of freezing temperatures at night means that when temperatures begin to rise after daybreak, the ice does not melt immediately as the temperature goes above freezing, and indeed, sheltered spots can remain iced for several hours after daybreak.

Conversely, in the evenings, it takes a while for temperatures to drop as night falls, and on surfaces, the residual heat of the day causes some delay to freezing, so that when temperatures go below zero, freezing of surfaces can take hours to occur.

Therefore, it is worse to have people travelling to work or school in darkness than it is to have them travelling home in darkness.

Schools:

Primary school children from ages 9-13 walk or cycle short distances to school in the mornings, with school starting from between 8.45-9am. This is good for children's exercise and good for the environment (compared to the alternative of being driven to school)

Using GMT, sunrise is latest at 8.40am (including as children return to school in January), and dawn begins 20 minutes or so before this. If we have BST all year round, then it will be pitch dark while children make their way to school for three months from mid-November to mid-February. It's worth including here too children in rural areas who travel by themselves to get the school bus (earlier than their suburban counterparts walk or cycle to school).

Why would a society willingly endanger schoolchildren thus by making the sun rise an hour later in the mornings?

On the reverse side, GMT has no adverse effects on primary schoolchildren travelling home, since the latest sunset is 3.58pm.

Even secondary school students (who are more road aware and have better cognitive reactions), are better served by earlier winter sunrise times. In general, secondary schools knock off at 4pm, which means they would ostensibly benefit somewhat from a later sunset in winter, but this would be more than offset by complete darkness for their travelling to school during the BST winters. Again, though, the safety needs of the younger children are more sensitive and these should be the baseline.

OTHER COMMENTS:

With BST in winter, the only way to remedy this would be to put school-hours forward an hour (starting at 9.45 or 10am), but if there's nothing wrong, why have two fixes. Putting the school forward in such a way would also mean that children wouldn't be going to school until six hours of brightness have passed during the summer, and secondary school students in particular would have less time to enjoy the brightness of summer evenings.

Also, wouldn't there be something ridiculous and Kafkaesque about time-changes causing institution-changes, which in turn could again cause time-changes etc. etc.

Until 1916 we used GMT (in conjunction with local times in micro-timezones). Institutions have adapted to the seasonal dawn/dusk cycle rather than vice versa (i.e., nature adapting to them). The general traditional 9-5 working day is based on an aggregate of these, but even this routine is being overtaken by new working models in an IT and post-modern age.

DOING AS BRITAIN DOES?

In favour of an independent Irish time-zone policy:

There are four time-zones within the 48 States of contiguous USA, and transition from state to state appears to be seamless, with minimal adverse effects. By extension of this experience, it would be possible for two time-zones to coexist on the island of Ireland, even with little or no hard border. Mobile digital devices automatically receive their time(zone) from the network (i.e., service-carrier/provider), and even where this network doesn't change when crossing a border, most mobile devices are automatically set to

1 of the Blind Legal Alliance

By Email: timeconsultation@justice.ie

Eileen Leahy
Head of Corporate Services
Department of Justice and Equality
51 St Stephen's Green
Dublin 2 D02 HK52

30 November 2018

Dear Ms Leahy,

European Commission proposal for a Directive on discontinuing seasonal changes of time and repealing Directive 2000/84/EC.

Aer Lingus is concerned regarding the repercussions for and disruption to passenger and freight connections and would prefer for the status quo to be retained. In the event that the European Union decision is to abolish daylight saving time (DST) changes, Aer Lingus – and the airline community in general – has assessed that the least impact would be felt if summertime was maintained as the permanent time, with winter moving accordingly in all applicable EU member states. Additionally, it is essential that any change is implemented in a harmonised and co-ordinated manner across all of the EU member states in order to avoid a patchwork of different time zones within the EU.

Should the time change proposal eventually be agreed, under any scenario the industry must have sufficient time to plan the changes to minimize disruption where possible. Tickets go on sale up to a year in advance. We note the European Commission now plans to implement the change in 2021 rather than in 2019 which is in line with the aviation industry recommendation.

We attach a joint industry position paper prepared by Airlines for Europe (A4E), IATA and the European Regions Airline Association (ERA) which was submitted to the European Commission in October 2018. This explains in more detail the impact of the proposed change to seasonal time on global aviation which we have summarised below in the context of the impact on Aer Lingus:

The complexity of revising schedules

- The aviation industry seasons (winter and summer) change on the same date European summer time changes. Although historical, this change of season is built-in to our business model, seasonal planning, fleet and crew planning and rostering, and schedules. Any change will impact our operations both within and to/from Europe.
- Airline schedules and slot planning are based on the same periods as European summer/winter changes over the whole of Europe. It is vital that any change is synchronized across all European Union member states. This minimizes disruption in the long term to passengers and minimizes the chance of confusion and missed flights. Asynchronous change in DST time across Europe would be costly and complex to accommodate, given other regions and countries with alternate clock changes in place already.
- Slot coordination at airports requires all operators to hold a pre-allocated time of operation at these airports – this ‘slot’ is defined by day and time. Any change to the summer/winter reference time in Europe will therefore impact whether the slots are held at the right time for operation.
- All arrival and departure flights at Irish airports would need to be moved by 1 hour for either the summer or winter season changes. The summer season is 10 weeks longer than winter, and is also the peak flying period - which means capacity is extremely congested. For this reason, as well as for the impacts which a change would have on night curfews, it would be preferable to remain on summer time permanently. However, this still requires immense rescheduling and planning to achieve.
- Many flights have slots on both ends of the route, for both intra-European and international routes, so this change is not a simple rescheduling. There would be two phases of disruption; a transition phase and the period thereafter.
- Airlines operating flights to and from non-EU destinations may prefer to maintain local time at the non-EU airport in particular to maintain connections or observe a flight curfew, and so retain their historic slots at the EU station. This creates competing demand for the same slot as an intra-EU flight will be seeking to retime to the new EU local time. At Dublin airport in particular, given its extreme congestion, the (new) slots needed to permit the change may not be readily available as they will likely be already occupied. Any difficulty in obtaining a slot corresponding to the new arrival and departure times would therefore be problematic.

The disruption to international connectivity

- Aer Lingus operates international routes in and out of Ireland that have been established over years of operation to ensure a carefully fine-tuned network and connectivity across the globe, which is to the benefit of passengers and shippers. The detailed planning of the schedules relies on slot timings and availability, built through the historic slot principles ingrained in the EU Regulation 95/93 and the slot rules of third countries. Re-timing would affect our global network and would require significant re-scheduling in order to preserve the coherence of our schedules. This process may take years due to lack of availability of the right airport slots, either at our key hub in Dublin or other airports worldwide. In the interim schedules will remain sub-optimal. Furthermore, as long as DST is applied in other global markets, the schedules and connections will become asynchronous with significant impact for passengers and shippers, and for the economic viability of some routes.
- Changing a slot requires there to be a slot available, and when all or almost all airlines are seeking to change slots due to a DST move, it becomes very complex. A slot not only reflects runway capacity, but there are specific terminal, apron and air space constraints as well, which further complicate availability, especially for international flights with their customs and border requirements.
- Flights between Ireland and international destinations are timed to maximize connections, as well as serve the business day. Changes to the slots may disrupt scheduled connection banks of flights, and be difficult to resolve due to curfews at other airports.

Aer Lingus has 1,030 scheduled services per week planned for Summer 2019 between the Republic of Ireland and the UK, which represents 43% of all (2,410) scheduled services planned between the Republic of Ireland and the UK during this period. The Dublin to London route is the busiest air travel route in Europe. There are no plans by the UK Government to amend UK DST, so if the EU proposal proceeds, then a time change between Ireland the UK would be introduced. This creates significant disruption to the flights schedules in this market.

Operational restrictions further reduce schedule changes

- Airports with night curfews and night closures are particularly difficult to move slots in during the peak periods and night shoulder periods. For long haul operations many airlines operate on the limits of the curfews, and so it's imperative their slots can be realigned on the other end to still make the flight

feasible. There are many major European airports with curfews and night bans.

- Airline schedules are not isolated between two city pairs. Instead, the schedule is built to efficiently use aircraft across carefully designed lines of flying to facilitate the airline's network, and so any change by an hour can disrupt not only one flight, but many. Moving a flight by even one hour in Europe reduces the turnaround time for that aircraft at its destination, which could have a knock-on impact across the whole schedule.
- Aer Lingus provides connectivity through Dublin airport in particular, from one destination to another via an intermediary point, it is essential that connections between flights are not lost with time changes.
 - Therefore airlines normally flex the slot on the other end of the route, and maintain the connection bank at their home base.
 - Even then it is not simple or straightforward, because connectivity comes from not just within the one airline's schedule, but ability to transfer passengers and freight between airlines and alliances at one hub.
 - The change in quality and quantity of connections offered would be costly for Aer Lingus and a disadvantage to the consumer
- The complexity of moving schedules for many airports due to a DST removal would be immense, and it's likely several flights or connections could not be accommodated at all, or at the preferred time, designed to meet the needs of the passenger, and build freight connections.

Safeguards in the event a decision is reached

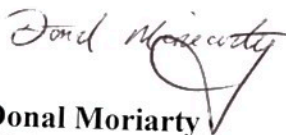
- Synchronization of all EU member states is essential, with ample consideration of and preparation time for the impact it will have on airline passengers and the industry as a whole.
- Coordination of airport slots and airline schedule finalization occurs in a specific timeframe ahead of each season. The summer seasons slots are coordinated from September the previous year, and the winter season slots from April the same year. However the planning for this coordination takes place months in advance of this period, and tickets go on sale from 330 days in advance of the flight.
- Should a change be agreed it is essential a lengthy lead time, of at minimum 18 months in advance (reflecting the planning time necessary), is provided for the industry to have time to prepare and process the changes needed. This will serve to reduce the disruption but will not mitigate it. We note that the European Commission is now planning that in the event a time change is

agreed, the first season it would be applied in full would be from the start of the 2021 summer season (28 March 2021).

In conclusion, it should be recognized that changes to existing DST arrangements will affect the ability of Aer Lingus and the airline industry in general to meet consumer and business needs at the busiest and most congested airports (including Dublin airport). The impact may be reduced where an appropriate lead time is introduced, but the impact will not be avoided. It is our recommendation that the status quo should remain. Should this not be possible, permanent summertime should be adopted from 2021 or later.

Please do not hesitate to contact us if you would like to discuss any aspects of our submission further.

Yours sincerely,



Donal Moriarty
Chief Corporate Affairs Officer

Joint industry position on Summertime Arrangements

Introduction

Airlines for Europe (A4E), the European Regions Airline Association (ERA) and the International Air Transport Association (IATA), and their respective members, are concerned about the proposal to abolish current DST changes switching from wintertime to summertime, and the timeline of the proposal, because it will have a **significant impact on the aviation industry and consumers at both European and global level**. We therefore urge the member states and European Parliament to consider the significant repercussions and disruption to passenger and freight connections when adopting their position. **A4E, ERA, IATA and their members would prefer to remain with the current situation.**

Should the decision be to finally abolish time changes, the airline community's assessment is that the **least impact would be felt if summertime is maintained as the permanent time**. This follows a thorough analysis of the impact of the time change on each season. In other words, summer time remains, and winter moves accordingly in all applicable EU member states. **Without complete synchronization of the final decision and timing to implement, the aviation industry will be left in chaos**. In other words, if the proposal is eventually agreed, it is vital that the change is synchronized across the 28 EU member states.

Should the time change proposal eventually be agreed, under any scenario the industry must have time to plan the changes to minimize disruption where possible. Tickets go on sale up to a year in advance. The current European Commission plan to implement the change in 2019 is far too soon. **A4E, ERA and IATA recommend that the earliest season the final clock change could take place is the start of the summer 2021 season (i.e. 28 March 2021).**

The impacts of such a decision on global aviation are profound. The following describes this in more detail.

The complexity of revising all airline schedules in Europe

- The aviation industry seasons (winter and summer) change on the same date European summer time changes. Although historical, this change of season is built-in to airlines business models, seasonal planning, fleet and crew planning and rostering, and schedules. Any change will have an impact at a global scale on air carriers operating within and to/from Europe.
- Airline schedules and slot planning are based on the same periods as European summer/winter changes over the whole of Europe. It is vital that any change to DST is synchronized across all European Union states. This minimizes disruption in the long term to passengers and minimizes the chance of confusion and missed flights. Asynchronous change in DST across Europe would be costly and complex for airlines to accommodate, given other regions and countries with alternate clock changes in place already.
- Europe remains the most congested area globally in terms of airport infrastructure, and therefore has 51% of all slot coordinated (level 3) airports worldwide: some 104 airports. Slot coordination requires all operators to hold a pre-allocated time of operation at these airports – this 'slot' is defined by day and time. Any change to the summer/winter reference time in Europe will therefore impact whether the slots are held at the right time for operation.

- All arrival and departure flights at EU airports would need to be moved by 1 hour for either the summer or winter season changed. The summer season is 10 weeks longer than winter, and is also the peak flying period - which means capacity is extremely congested. For this reason, as well as for the impacts which a change would have on night curfews, it would be preferable to remain on summer time permanently. However, this still requires immense rescheduling and planning to achieve.
- Many flights have slots on both ends of the route, for both intra-European and international routes, so this change is not a simple rescheduling. There would be two phases of disruption; a transition phase and the period thereafter.
- The changes could have a lesser impact and be a bit simpler to manage for intra-European flights, but they will be difficult for all international flights, i.e. departing or arriving from outside EU. At major EU airports in particular, given their extreme congestion, the (new) slots needed to permit the change are not readily available, because they are already occupied. Any difficulty in obtaining slot corresponding to the new arrival and departure times would cause problems on a country-to-country level.

The disruption to international connectivity

- Many airlines operate international routes in and out of Europe, that have been established over years of operation to ensure carefully fine-tuned networks and connectivity across the globe, which is to the benefit of passengers and shippers. The fine-tuning of the schedules relies on slot timings and availability, built through the historic slot principles ingrained in the EU Regulation 95/93 and the slot rules of third countries. Re-timing would affect these global networks and would require significant re-scheduling worldwide in order to preserve the coherence of these established networks. This process may take years due to lack of availability of the right airport slots, and in the interim schedules will remain sub-optimal. Furthermore, as long as DST is applied in other global markets, the schedules and connections will become asynchronous with significant impact for passengers and shippers, and for the economic viability of some routes.
- Changing a slot requires there to be a slot available, and when there are multiple airlines all seeking to change slots due to a DST move it becomes very complex. A slot not only reflects runway capacity, but terminal constraints as well, which further complicates availability, especially for international flights with their customs and border requirements.
- Flights between Europe and international destinations are frequent and timed to maximize connections, as well as serve the business day. Changes to the schedule disrupt connection banks of flights, and may be difficult to resolve due to curfews at many European hub airports, and those on the other end of the route.

For example, just the Europe - North American market is significant, with over 35,000 flights in the summer period of July and August this year to/from congested EU airports. Every single schedule would need to be reviewed for scheduling impact in the event of the elimination of seasonal time changes.

Operational restrictions further reduce schedule changes

- Airports with night curfews and night closures are particularly difficult to move slots in during the peak periods and night shoulder periods. For long haul operations many airlines operate on

the limits of the curfews, and so it's imperative their slots can be realigned on the other end to still make the flight feasible. There are many major European airports with curfews and night bans.

- Airline schedules are not isolated between two city pairs. Instead, the schedule is built to efficiently use aircraft across carefully designed lines of flying to facilitate the airline's network, and so any change by an hour can disrupt not only one flight, but many. Moving a flight by even one hour in Europe reduces the turnaround time for that aircraft at its destination, which could have a knock-on impact across the whole schedule.
- Airlines that provide connectivity through hub airports, from one destination to another via an intermediary point, need to make sure the connections between flights are not lost with time changes.
 - Therefore airlines normally flex the slot on the other end of the route, and maintain the connection bank at their home base.
 - Even then it is not simple or straightforward, because connectivity comes from not just within the one airline's schedule, but ability to transfer passengers and freight between airlines and alliances at one hub.
 - The change in quality and quantity of connections offered would be costly for the industry and a disadvantage to the consumer
- The complexity of moving schedules for many airports due to a DST removal would be immense, and it's likely several flights or connections could not be accommodated at all, or at the preferred time, designed to meet the needs of the passenger, and build freight connections.

Safeguards in the event a decision is reached

- Synchronization of all EU member states is essential, with ample consideration of and preparation time for the impact it will have on airline passengers and the industry as a whole.
- Coordination of airport slots and airline schedule finalization occurs in a specific timeframe ahead of each season. The summer seasons slots are coordinated from September the previous year, and the winter season slots from April the same year. However the planning for this coordination takes place months in advance of this period, and tickets go on sale from 330 days in advance of the flight.
- Should a change be agreed it is essential a lengthy lead time, of at minimum 18 months in advance (reflecting the planning time necessary), is provided for the industry to have time to prepare and process the changes needed. This will serve to reduce the disruption but will not mitigate it. For this reason we would like to safeguard that in the event a time change is agreed, the first season it is applied in full would be from the start of the 2021 summer season (28 March 2021).

In conclusion, it should be recognized that changes to existing DST arrangements will affect the ability of the airline industry to meet consumer and business needs, at the busiest and most congested airports. The impact may be reduced where an appropriate lead time is introduced, but the impact will not be avoided. It is our recommendation that the status quo should remain. Should this not be possible, permanent summertime should be adopted from 2021 or later.

A Chara,

The Agricultural Science Association (ASA) is the professional body for graduates in agriculture, horticulture, forestry and food science and technology. Our 2,000 members are employed across the entire agri-food industry, most notably within government departments, research, advisory, education and training, agri-business, rural organisations and the media.

The ASA appreciates the opportunity to submit its views regarding seasonal clock changes.

Many of the ASA's members are involved in outdoor activity or dealing with those that are involved in such activity. In light of this the ASA surveyed its membership to facilitate an appropriate response to this consultation. The ASA membership's response to each question raised is outlined below.

Question 1 Do you want to stop changing the clocks twice a year?

The majority of ASA members (66% of survey respondents) would like to stop changing the clocks twice a year.

Question 2 If the clock changes stop, do you want to remain on summer time or winter time?

If the clock changes stop, the majority of ASA members (81% of survey respondents) would like to remain on summer time.

Question 3 What would your opinion be if this proposal were to give rise to different time zones between Ireland and Northern Ireland?

ASA members are strongly in favour of discontinuing the process of changing the clocks twice per year, however they have significant concerns from an economic as well as a personal/social perspective if this were to give rise to different time zones between the Republic of Ireland and Northern Ireland.

The majority of ASA members believe the same time zone should apply across the island of Ireland.

You are very welcome to contact ASA again if you are seeking any further views on this topic as the process develops.

Yours sincerely,

Cheryl Hazenberg

Agricultural Science Association

Irish Farm Centre, Bluebell, Dublin 12

Telephone: (01) [REDACTED]

Website: www.asaireland.ie

RCN #20151652



BALLINACOR CAMOGIE CLUB

Submission regarding Seasonal Clock Changes

Summary: Please maintain summer time to allow training/matches take place on summer evenings

To Whom it may concern,

I am writing on behalf of Ballinacor Camogie club. We are a camogie club based in the Glenmalure Valley in County Wicklow. Although based in a remote area, our club thrives and is an integral part of the local community. We constantly fundraise to allow us to continue our activities, coaching adult and juvenile teams both for fun and to competitive levels.

All training takes place outdoors on summer evenings. We do not have floodlights nor can we foresee a circumstance where we would be in a position to purchase or operate same. The majority of our competitive matches are played on summer evenings with start times of between 7pm and 7.30pm, often finishing as darkness begins to fall. For these reasons, we ask that **summer time should be maintained**. We cannot see how it would be possible for our teams to continue to train / compete if we were to lose an hour of daylight on summer evenings.

In a remote area, where amenities are extremely limited, it is imperative that our club can continue to operate. We believe our club has a huge benefit to the local community, encouraging young girls into sport and also welcoming women of all ages and abilities. Along with the physical benefits of participating in sport, our members gain confidence, teamwork skills, and make lifelong friends.

Please consider our submission and do not hesitate to contact me should you require any further information.

Yours sincerely,

Niamh Ó Ceallaigh

Member – Ballinacor Camogie Club

[REDACTED]

[REDACTED]

Good morning, BIM position is that the sector would be largely unaffected by these changes.

Regards Lorraine

Lorraine Hardiman

Assistant to Chief Executive and Corporate Services Director

Bord Iascaigh Mhara

Eir Code A96E5A0

T +353 [REDACTED]

E Lorraine.hardiman@bim.ie

Ireland's Seafood Development Agency
www.bim.ie

Central Bank of Ireland - UNRESTRICTED

As I understand it we are being asked 3 questions – answers below in red

1. Do you want to stop changing the clocks twice a year? Neutral

2. If the clock changes stop, do you want to remain on summer time or winter time? Summer time – in my view far fewer people go outside for non work related matters in the morning than the evening. More daylight might encourage people to go for a walk or exercise in line with healthy living objectives.

3. What would your opinion be if this proposal were to give rise to different time zones between Ireland and Northern Ireland? Although not ideal it isn't ultimately relevant. I view it as similarly to currency. Better if we had the same but have to accept that they are entitled to do as they wish.

Rose Alice Murphy, *Senior Lawyer*

Enforcement Investigations Division
Central Bank of Ireland,

North Wall Quay, Spencer Dock,

PO Box 11517, Dublin 1, Ireland.

T: +353 (0)1 [REDACTED]

E: rosealice.murphy@centralbank.ie

www.centralbank.ie

Time Consultation Mail In **Query**

Dear Eoghan,

Many thanks for the inclusion of the Church of Ireland Board of Education in this consultation on the seasonal clock changes.

This a matter of interest to the Board as it is the representative body for nearly 6% of the primary schools in the State.

In general terms, the Board is in favour of the retention of summer time throughout the year for a number of reasons:

While most children travel to school by private car or by some form of school transport, it remains the case that many still walk to school. This obviously entails children being out on public pathways and roads in the early morning period.

The continuation of summer time into the winter period would allow children who walk to school to do so in brighter weather for much of the school year.

This would be a welcome development.

At the end of the school day, a longer brighter evening may encourage children to engage in some form of outdoor physical activity (rather than staying indoors on screen-time).

This would be a healthy development - both physically and psychologically and would be most welcome; mindful of John 9:4 which reads:

"As long as it is day, I must do the works of Him who sent me. Night is coming when no one can work".

Additionally, teachers - like all citizens - would welcome the increase/lengthen brightness that the retention of the summer time would allow (albeit limited during the months of November to January).

As mentioned in your letter, it is the EU Commission who are leading discussions in relation to this matter and the Board will be interested to learn of the outcome of consultations on this matter from across the continent of Europe.

Given the envisaged withdrawal of the United Kingdom of Great Britain and Northern Ireland from the European Union (aka 'Brexit'), the Board are unsure as to how a change in seasonal time would work in practice if the UK government were not minded to also bring in such a change.

The Board would not be in favour of a different time zone to our nearest island neighbour and are of the view that the maintaining of a single time zone among these Atlantic isles is a practical imperative.

The Board is happy to engage in further discussions/consultations on this matter should the Department of Justice wish to do so.

With kind regards,

Dr Ken Fennelly
Secretary, General Synod Board of Education (RI)
Church of Ireland House
Church Avenue
Rathmines
Dublin 6

Cllr. John Ryan MCC <JRyan@wicklowcoco.ie>

Hi there

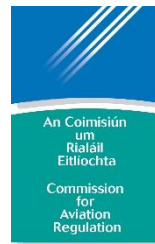
I have been communicating with a large number of constituents about the proposed changing of our approach to winter time summer time - all have made clear that they would like to do away with the current system - they would prefer to keep to Summer time even if this results in different time between Ireland (ROI) and the North

Thanks

John

Sent from my iPhone

The contents of this e-mail (including attachments) are private and confidential and may also be subject to legal privilege. It is intended only for the use of the addressee. If you are not the addressee, or the person responsible for delivering it to the addressee, you may not copy or deliver this e-mail or any attachments to anyone else or make any use of its contents; you should not read any part of this e-mail or any attachments. Unauthorised disclosure or communication or other use of the contents of this e-mail or any part thereof may be prohibited by law and may constitute a criminal offence.



*Department of Justice and Equality
51 Saint Stephen's Green
Dublin 2*

Re: Seasonal Clock Change Implications for Airline Scheduling and Airport Slot Coordination

Dear Sir/Madam,

Please see below some comments in relation to the proposed ending of seasonal clock changes in the EU, with specific reference to the implications for airline scheduling and slot coordination.

Currently, scheduling seasons are timed to correspond with the seasonal time changes. That is, the Summer Season lasts from March to October while the Winter Season lasts from October to March, with all schedules therefore dependant on the seasonal time change. Under the Slot Regulation (Regulation 95/93, as amended by Regulation 793/2004), at a coordinated airport such as Dublin, air carriers cannot operate without a slot being allocated by the independent coordinator. An airline can retain the rights to a specific series of slots in the subsequent corresponding season if it has met certain criteria regarding their use. For example, under the Slot Regulation, a series of slots operated during the Summer 2018 Season leads to an entitlement to operate the same series in the Summer 2019 Season.

Therefore, airline schedules and consequent historic slot entitlements have developed based on the seasonal time change. There would be significant related issues and costs if this proposal were to be implemented:

- Many airports in Europe operate at or near capacity at certain times. At Dublin, the flight schedule fills the declared capacity in most hours of the day at certain times of the year. A change to the current time synchronisation across such airports would mean that some historic slot times will no longer be aligned. If, for example, Ireland was to decide to maintain Summer Time year-round, historic slots to operate to airports in countries which have chosen Winter Time would all be misaligned by an hour. In particular, where the airport at both ends of the route is congested, airlines may be unable to obtain slot time changes at either airport. This issue would be mitigated if all Member States were required to transition to either Summer or Winter time, ie if the change was to be synchronised across the EU. However, for operations to non-EU airports, the season in which the disruption occurs would depend on whether Summer or Winter Time is chosen. Given that the Summer Season is both longer and busier, disruption would be further reduced if all Member States were to transition to year-round Summer Time.
- Given the above point, there would need to be clear rules in place across the EU with regard to how coordinators should prioritise operations which have been compromised. The time specific historic entitlements would in many cases no longer be usable. To some extent, these slots could be swapped for slots in the adjoining hour which have been similarly affected, on

an ad-hoc basis. However, where this is not possible, under the current set of rules there would be no prioritisation rule for the coordinators to apply. This would be best addressed on an EU-wide basis, either through amending or supplementing the Slot Regulation.

- There would be capacity issues for congested airports resulting from the change in the profile of demand. For example, at Dublin Airport, the Asian and Middle Eastern carriers arrive between 0630 to 0730 local time during Summer and 0530 to 0630 local time during Winter, as they don't have seasonal time changes. If Ireland was to select Winter Time, these operations could not be accommodated at 0530 to 0630 during the busy Summer Season, as the first wave of departures would not have left the airport and there would not be sufficient aircraft parking stands. This is just an example of the types of issues that would be caused.

Given the above, disruption to airline schedules is inevitable, particularly for hub-and-spoke carriers where the situation would be further complicated by the need to consider connecting flights. This disruption can be expected to translate into higher costs and reduced connectivity, which ultimately affect air passengers. The amendment to the proposal such that it would not occur until 2021 would be welcomed by industry, as it allows some more time for transition plans to be put in place. Similarly, the proposed amendment such that Member States must notify time changes at least 18 months in advance would cause less issues than the initial proposal of 6 months. In order for industry to develop transition plans, there would need to be visibility as early as possible regarding the time which each Member State is planning to adopt.

The proposal identifies that the key element is continued harmonisation, however it is proposing to allow asynchronous time changes to a system which is already harmonised. Evidence on each point which could weigh in favour of the proposed Directive is, in each case, described as 'inconclusive'. It is therefore not clear why this change is being proposed, given the lack of any evidence regarding the benefits.

Yours sincerely,

Luke Manning

Economist

Commission for Aviation Regulation



19th November, 2018

Response to Consultation on Seasonal Clock Changes

1. Do you want to stop changing clocks twice a year?

From a strictly operational perspective, Irish Lights would have no objection to ending daylight saving.

2. If the clock changes stop. Do you want to remain on summer time or winter time?

Due to Ireland being geographically the furthest west of all member states, from an operational perspective Irish Lights believes remaining on summer time would be the preferable option if clock changes stop. A substantial body of our organisations work can only take place during day light hours therefore, an increase in day light hours during the evenings of the winter months could potentially improve both operational work efficiency and safety performance.

3. What would your opinion be if this were to give rise to different time zones between Ireland and Northern Ireland?

Irish Lights is the General Lighthouse Authority (GLA) for the island of Ireland and therefore covers both jurisdictions. Our organisation believes that if there was a time difference between Ireland and Northern Ireland this would be highly negative from an operational perspective. Such a change would not only cause potential general confusion but lead to a loss in the amount of time during the normal working day in which simultaneous communication between our stakeholders in Northern Ireland and ourselves could take place. This could subsequently reduce operational efficiency as well as potentially have a detrimental effect on safety performance and emergency response not only for our organisation but also within the wider maritime sector on the island of Ireland.

Due to Irish Lights close operational relationship with our Tri-GLA partners, Trinity House in England & Wales and the Northern Lighthouse Board in Scotland we believe full consideration should also be given to similar negative effects of any potential time difference with the rest of the United Kingdom.

Contact: Capt. Robert McCabe, Director of Operations and Navigation Services,

Tel: 01- [REDACTED]