

TO WHOM IT MAY CONCERN

I WOULD LIKE TO REGISTER MY SUPPORT TO RETAIN SEASONAL CLOCK CHANGES FOR SAFETY OF ALL ROAD USERS, BUT IN PARTICULAR SCHOOL CHILDREN WHO MIGHT OTHERWISE TRAVEL TO SCHOOL IN DARKNESS.

I HAVE BEEN UNABLE TO ACCESS THE REGISTER THROUGH THE LINK PROVIDED.

MANY THANKS

Diarmuid Hegarty

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**PS Think before you print!**

Dear Sir/Madam,

Thank you for including us in your consultation process.

It would be the preference of Horse Racing Ireland to keep the bi-annual clock changes.

As it currently stands we adapt our 360+ annual fixtures around those bi-annual clock changes and that has an impact right across our industry.

Horse are generally trained and conditioned at first light, and race meetings take advantage of light at the other end of the day (to maximise attendances etc), with the last race finishing at a safe distance from sunset.

Should you require any further detail around our scheduling, do not hesitate to get in contact.

Kind regards,

Jonathan Mullin

Director of Communications and Public Affairs

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## **Consultation on seasonal clock changes – submission by the Housing Agency**

The Housing Agency is a government agency focused on supporting Local Authorities, the Department of Housing, Planning and Local Government (DHPLG) and Approved Housing Bodies (AHBs). The Agency also implements the Pyrite Remediation Scheme and is the interim regulator of the AHB sector. Our primary function is to provide the services for, and on behalf of, the Minister of Housing, Planning and Local Government, and each local authority in the performance of their functions under the Housing Acts.

### **Observations**

The Housing Agency makes the following observations, specifically in relation to the impact of the proposed changes on **housing quality and housing supply**:

**The Housing Agency favours the introduction of summertime all year round so long as it does not give rise to different time zones between Ireland and Northern Ireland.**

The brighter evenings would improve access to daylight in housing in the winter and would therefore have a positive impact on public health generally, and particularly for older people. It also may reduce energy consumption because of less need for artificial light in the evenings with a consequent reduction in CO2 emissions. The brighter evenings could also potentially reduce the nett number of road accidents as these tend to peak between the hours of 4pm and 7pm.

However, as work on construction sites frequently commences before 8am, wintertime, and the resulting brighter mornings, provides advantages for builders (as

it does to others, such as children going to school and the farming community).

**Consultation with the construction industry therefore should be undertaken** to ensure that the introduction of summertime does not adversely impact on of site safety and efficiency.

**The Housing Agency is not in favour of different time zones between Ireland and Northern Ireland** as this would impact on workers commuting between Ireland and Northern Ireland. The possibility that it would reduce the number of construction firms and individual workers from the North of Ireland who would be prepared to travel to the South to work on housing projects is a particular concern at time when the availability of the skills needed to construct dwellings is vital for our wellbeing and economy.

Different time zones would be difficult for, and could impact on the health of, people who commute on a daily basis between Ireland and Northern Ireland. It would also impact on items such as organizing childcare in one time zone while living in another, co-ordinating school runs, organizing the supply of building materials and such like. Large numbers of construction firms and workers live in Northern Ireland and commute to Southern Ireland on a daily basis.

If you require further information or clarification on any of the points raised, please contact the undersigned.

**Isoilde Dillon**

For and on behalf of the Housing Agency

# **Ibec Response to Consultation on Seasonal Clock Changes**

## **A Submission to the Department of Justice and Equality**

### **November 2018**

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

Ibec is the leading voice of Irish business and our members across all sectors of the economy employ over 70% of the private sector workforce. The issue of seasonal clock changes is an important policy concern for business and we have received extensive feedback from our members on the EU Commission proposal. Our members have raised concerns about the following implications of changes to the current arrangements:

- **Uncertainty of how changes in other country changes will impact on Ireland:** It is currently unclear how other EU countries will respond to the proposed changes and the timeline of Brexit negotiations makes the likely UK response to any changes particularly uncertain. Irish business therefore has no line of sight on how any change in Ireland would impact on the time differential with our main trading partners. This uncertainty, coupled with wider business risks caused by Brexit (particularly in the area of logistics and supply chain management), means that it is currently difficult for business to assess the impact of stopping seasonal time changes.
- **Time difference changes with our main trading partners:** Ireland's position in the GMT zone is an advantage in the provision of global business services, as it straddles the Asian and North American time zones and hence business trading hours. This strategic positioning has become more important as the traded services sector continues to grow in economic importance. A time change that would alter the existing time differences with other strategic global business hubs, such as Pacific Time Zone of the US, would disrupt existing business processes. The change would involve a significant cost to business and necessitate scheduling and work planning adjustments.
- **International transport and logistical challenges:** any change in the existing time differences with other countries will result in significant transport and logistics challenges. The disruption caused in the aviation sector will be particularly acute but it would also effect shipping and possibly land transport scheduling with Northern Ireland. Dublin airport is already facing capacity constraints and potential future more onerous restrictions around flight times could accentuate these challenges. Any change in the time difference with UK based airports would pose extensive scheduling difficulties and would require a long lead in time to facilitate planning.

In summary, and reflecting the uncertainties and risks highlight above, Ibec believes that the Irish Government should currently oppose any change to the status quo. This position should be reviewed if other non-EU countries were to cease seasonal time changes.

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

On the basis of the above, the business sector does currently not have a view on a preference for winter or summer time in the event of a change to the status quo.

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

Our position set out in response to Question 1 above, is strongly influenced by the likely costs and disruption that any deviation from GMT would involve. These problems would be particularly acute on the island of Ireland and would pose significant challenges for the all island economy, including the movement of goods and people across the island. It would result in costly disruption to the functioning of the labour market on the island of Ireland and the many thousands of workers who commute to work across the border.

To whom it may concern,

Please see below ICMSA response to the following questions raised in the consultation process:

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

Our members have voted in favour to stop changing clocks twice per year

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

Our members would like to remain in summertime

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

We would be in favour of the same time zone shared by ROI and NI

Thank you,

Aine

Aine O'Connell

PhD - Dairy Science

Policy Officer

ICMSA



Dear Eileen

Thank you for including ITOA in your recent communication regarding the EU commission proposal to end seasonal time change.

I wish to simply advise that our organisation is in favour of Summer time hours being extended to the winter period thus allowing for greater day light later in the day. This would in our view enable visitors in winter to have a better holiday experience with more time in daylight in the afternoon making for easier access nationally.

We would be in favour of this of course on the basis that Northern Ireland (the UK) will be included in any such change.

Kind regards

Ruth Andrews

**Ruth Andrews**

**Chief Executive**

**ITOA (Incoming Tour Operators Association Ireland)**

**P.O. Box 65**

**Bray**

**Co. Wicklow | Ireland**

**T. 353 (0)1 2861113    F. 353 (0) 1 2861107**

**[www.itoa-ireland.com](http://www.itoa-ireland.com)**



**Incoming Tour Operators Association - Ireland Ltd Reg No. 127179**

Sir/Madam

Thank you for the invitation to provide views on the above issue. Although not impacting on the core of our work, our staff regularly travel to the EU as part of our obligations under law and as such I circulated staff to ascertain their views. In accordance with this exercise, the Authority would respond as follows:

The Authority wishes to retain the move to Summertime each year

The Authority would prefer retaining GMT as Standard time

The Authority's view is not predicated in any meaningful way on what may happen to time in Northern Ireland

Kind regards

Kevin Prendergast  
Chief Executive  
Irish Auditing & Accounting Supervisory Authority  
Údarás Maoirseachta Iniúchta & Cuntasaíochta na hÉireann  
Willow House, Millennium Park, Naas, Co Kildare W91 C6KT

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Dear Ms. Leahy,

Please see the Irish Aviation Authority's response in relation to your letter with regards to the EU Commission proposal to end seasonal clock changes in 2021 below. This report has previously been submitted to the Department of Transport, Tourism and Sport via email on Thursday 25<sup>th</sup> October 2018 in relation to its request for observations on the EU Proposal on Discontinuing seasonal changes of time from the Department of Justice.

### **Network Management**

From reading a bit it would appear that there was over 80% of respondents through the EU that were in favour of remaining of Winter time (standard time).

There are Air Traffic Management system implications, but nothing on the scale of the Y2K millennium change (2000). These would apply to everything from COOPANS (the IAA's ATC system) to our iPhones, etc. If there is to be a change IAA would definitely need a risk assessment and a clear plan. The Y2K experience would help if the records of this have been kept. The time-scale is quite short considering all the system clocks that would need some adjustment in every sector of the economy.

From a traffic perspective there could certainly be implications for IRL UK travel

See the chart below.

<cid:image001.png@01D4693B.9C1BC6C0>

The IAA would assume that in (fully coordinated) capacity constrained UK airports (EGLL, EGKK) Irish flights might have to respect their current airport slots by and large. This could mean operating one hour earlier during the summer time. This could have implications on the early morning. Instead of the rush from 06h00 to 08h00, it might be from 05h00 to

08h00, with obvious staffing implications, but with a more spread out traffic load. However, all other EU airports would be in a similar position, so there would have to be some general adjustments of airport slots, subject of course to environmental constraints. We would imagine that the airlines would have a better view of this.

The IAA had a quick look at the summer and winter transatlantic schedules (Aer Lingus). They operate at more or less the same year round local times in Ireland. If we were on constant winter time (while North America continued to change their clocks) then similar issues to UK might arise.

The IAA would seek the views of the airlines (Aer Lingus, etc. are in copy of the mail from DTTaS). Their position would enable the IAA to get a better picture on staffing.

The IAA does not see any specific network ATM issues. We already have 3 time zones across the European ATM network. Since we all operate in UTC there is no particular network ATM issue.

### **Shannon En-Route**

The IAA would expect a few minor roster tweaks, but no significant issues anticipated from En-Route.

### **Dublin Terminal Services**

Our main concern would be a change in the airline schedules which could affect the staff required at different times.

It would likely mean changing all duty start and end times to line up with the changed schedules which, if we changed in March 2019, we would have to do by 1<sup>st</sup> Feb 2019. This would require us knowing all of the Airline Operating times by then so that we can accurately staff to demand.

If the IAA were likely to be busier at 05:00, we would have a particular difficulty. Current agreements mean that no duties can start or finish between 00:00 – 06:00. We normally have minimum staffing during these hours and it would leave us in a position where we would either have to re-negotiate a long standing agreement or put extra staff on night duties.

Overall Dublin would see a change in our operating schedules for all of the Network including the US and this would take a little getting used to but it would concern the IAA if we would head into Summer 2019 without much time to get used to the new schedules.

Kind regards,

Sarah

*Sarah Symes*

Corporate Affairs

Direct Line: 01-6031494 | Email: [sarah.symes@iaa.ie](mailto:sarah.symes@iaa.ie)

Irish Aviation Authority | The Times Building | 11-12 D'Olier Street | Dublin 2

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29<sup>th</sup> November, 2018

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

**Re: Consultation on Seasonal Clock Changes**

Dear Ms Leahy

Thank you for your recent correspondence regarding the consultation on Seasonal Clock Changes.

The Irish Congress of Trade Unions welcomes the opportunity to contribute to the consultation process put in place by the Department in regard to the EU Commission proposal to end seasonal clock changes in 2021.

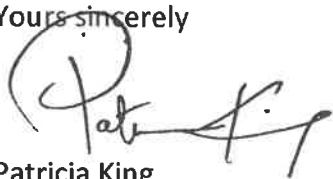
Congress is of the view that a harmonised system is critical. The achievements of the successive directives which created this harmonisation should not be lost. This is an important factor within the EU but also has particular significance for the island of Ireland when the UK ceases to be a member. It would be wholly problematic for two time zones to exist on the island. The negative effects of the emergence of any asynchronous arrangements are borne out by the 2014 report by ICF International which looked at the potential impact on the internal market of goods and services. While the latter presents challenges anyway in the context of Brexit, a series of further social and indeed political challenges may emerge if there were different time arrangements on the island.

While the European Parliament's Ex-Post Impact Assessment points to the historical reasons for the seasonal time changes no longer being as relevant, trade unions see no compelling reasons for a change from current arrangements to be made. Nor indeed, is there any significant objection to abolishing the biannual time change. Congress notes the significant majority of EU citizens who favoured a change. It is clear that latitude plays a significant part in peoples' perceptions of the issue.

The matter has been considered by the Health & Safety Committee of Congress, which consulted with affiliated unions. The Committee has concluded that there are no fundamental Occupational Safety and Health (OSH) issues arising from a change. On balance, the Committee leaned towards favouring Option 2 (Summertime) if there was to be a move from current arrangements. This was largely because later daylight in the evenings

would tend to encourage more outdoor activity and exercise, with consequent potential health benefits. While it is not an OSH consideration, the Committee also noted the research conducted by the Road Safety Authority which is quoted in the EC background paper. This concluded that there was not likely to be any significant change in the number of accidents arising from a change. Nevertheless, there was some concern expressed that darker mornings in a Summertime scenario might leave children at greater risk while travelling to school. While the various reports note that the issue of road safety has been perhaps more widely researched than other health-related issues for example, the conclusions are nevertheless often ambiguous. Congress would like this issue to be looked at more closely in any consideration of a change.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Patricia King', written over a circular stamp or mark.

Patricia King  
GENERAL SECRETARY

pk/es





# IFA

## **IFA SUBMISSION ON DEPARTMENT OF JUSTICE CONSULTATION ON SEASONAL CLOCK CHANGES**

### **Introduction**

Seasonal clock changes, also known as Daylight Saving Time (DST), consist of bringing the clock forward from Standard Time in early spring by one hour and back by one hour to Standard Time in autumn. The effect is a shift in daylight hours meaning an hour more daylight in winter mornings which is lost in winter evenings.

The origin of “Daylight Saving Time” (DST) goes back to the early part of the 20<sup>th</sup> Century with Canada the first to introduce it in 1908; in the US, it is 100 years old this year.

In Europe, the German and Austro-Hungarian Empires introduced it first in 1916. It was adopted by other European countries after the first World War, and abandoned until the Second World War by many, then re-adopted and re-abandoned. It then became more prevalent with the oil crisis of the 1970’s.

More recently, DST was legislated for by the EU from 1980 to ensure that all countries within the single market change their clocks at the same time, and since 2001 this has been regulated to occur on the last Sunday of March, and the last Sunday of October.

The rationale behind the concept is based on the relativity of the number of winter versus summer daylight hours in countries that are neither close to the poles (where variability is huge and an hour either way makes little difference) nor the equator (where days and nights are of more even length throughout the year).

Justifications for the DST have included much disputed energy savings (heat and light), studies suggesting that making more daylight available when more people are on the roads could lead to fewer accidents and injuries, and other studies yet suggesting people’s health may suffer as a result of DST. Also, while people appreciate the extra hour of daylight after work over the summer months provided by DST, this is reversed during the winter.

Hence, DST has come under more scrutiny, including through the current EU consultation.

### **Ireland’s daylight hours in winter and summer**

Its position at the North West edge of Europe means that, while the winter daylight hours available in Ireland are not as limited as in the Scandinavian or Baltic countries, they are nonetheless fewer than for the main countries of continental Europe.

Conversely, they tend to be longer over the summer period.

On 22<sup>nd</sup> Dec 2018 – shortest day of the year - the following will be the sunrise, sunset hours and number of daylight hours for various locations around Europe (source [www.timeanddate.com](http://www.timeanddate.com)):

Country (location)	Sunrise	Sunset	Hours of daylight
Ireland (East)	8.43h	16.17h	7.33h
Nice (France)	8.01h	16.57h	9h
Munich (Germany)	8.01h	16.22h	8.21h
Warsaw (Poland)	7.43h	15.25h	7.42h
Madrid (Spain)	8.34h	17.51h	9.17h
Amsterdam (NL)	8.48h	16.29h	7.40h
Aarhus (Denmark)	8.50h	15.45h	6.54h
Helsinki (Finland)	9.24h	15.13h	5.49h

On 21<sup>st</sup> June 2018, by contrast, Ireland (East) got 17h of daylight, while Nice got 15.26h, Munich 16.04h, Warsaw 16.46h, Madrid 15.03h, Amsterdam 16.48h, Aarhus 17.39h and Helsinki 18.55h.

### **Seasonal daylight hour changes and Irish farming**

Farmers have made major investments on farms in the last couple of decades, and have significantly improved their facilities for handling animals including lighting in farm yards and milking parlours.

As a workday on farms may start around 6 or 7 am, possibly even earlier, it would in winter start in the dark with or without DST. But quality lighting available on farms means the busy early morning work such as drafting/inspecting/dosing animals or milking cows, can be carried out safely with good visibility.

Hence, other considerations may affect farmers' views regarding DST – for example, the extra morning hour of daylight over the winter months may mean that a hard frost or fog dissipates sooner.

Farmers with young families may favour DST as it ensures children who walk or cycle to and from school on country roads can do so for most of the winter period in daylight, and therefore more safely.

Some farmers may feel that any kind of change to the current system would cause more disruption than it is worth.

Conversely, depending on how they organise their daily work, some farmers may take the view that the additional hour of evening light they would sacrifice in winter mornings should the clock change be abandoned and Summer Time apply year-round, would be more valuable to them.

And the farmers with young families may value the shift from the morning of the extra hour of daylight after school and work to engage in leisure pursuits.

In the main, we have found that those farmers who favoured ceasing clock changes preferred to stay with Summer Time as Standard Time all year round.

Some farmers may question the usefulness of DST in light of the lack of clarity in the reasons why it was brought in in the first place, and the fact that it seems more like a historical legacy than a current, valid, justified approach.

All farmers would, however, be very concerned should the approach to our daylight settings differ from the UK's and Northern Ireland's. In light of the facts that Northern Ireland forms part of the Island of Ireland, and that the agricultural sector in both parts of the Island is intricately linked, there cannot be any difference in time zones and therefore timing of any clock changes between Ireland and Northern Ireland.

This is an issue which may be outside of the remit of this consultation after Brexit, as the UK could then decide to set their own Standard Time without reference to the EU approach.

### **Other issues**

#### **Impact relating to carbon emissions**

IFA takes the view that the full impact of the various seasonal clock change scenarios, especially on our national carbon emissions from farming and all other sectors, should be properly assessed at both Irish and European level before the current system is abandoned.

#### **Option for member states to make their own arrangements may have negative trade implications for the Single European Market**

It appears the EU Commission proposes to allow Member States to choose their own Standard Time, which opens the real prospect of substantial time differences between Member States which could impede trade and commercial interaction in the context of the EU's Single European Market. The EU currently spans 3 time zones representing 2 hours' time difference from East to West. This proposed approach could result in this widening to 4 hours.

### **Conclusions**

The justification for the current DST approach in Europe at times seems to farmers and citizens lost in the mist of time, but there has yet to be a scientifically researched and documented justification given to move away from it in one or other direction.

IFA takes the view that a comparative assessment of the current DST approach versus constant summer or winter time on EU trade, road safety, public health, the environment and carbon emissions needs to be properly evaluated prior to suggesting any fundamental change.

IFA also takes the view that allowing variable approaches by different Member States has the real potential to impede trade and commercial relations within the Single European Market where it could result in time zone differences of up to 4 hours from East to West.

Finally, IFA believes the Island of Ireland must remain in the same time-zone, and potential time changes occur at the same time, regardless of what decision is made within the EU on seasonal daylight time changes.