

Response from Tourism Ireland to the Department of Justice and Equality Consultation on Seasonal Clock Changes

Introduction

Tourism Ireland welcomes the opportunity to respond to the Department of Justice and Equality consultation on seasonal clock changes.

Tourism Ireland is responsible for marketing the island of Ireland as a holiday destination overseas. It was established as one of the "six areas of co-operation" under the framework of the Belfast Agreement of Good Friday 1998 and operates under the auspices of the North South Ministerial Council through the Department of Transport, Tourism and Sport in Ireland and the Department for the Economy in Northern Ireland.

Our objective is to grow overseas tourism revenue and visitor numbers to the island of Ireland and to help Northern Ireland to realise its tourism potential. We operate in more than 20 markets overseas.

EU proposal to abolish seasonal clock changes by 2021

As an all-island body, responsible for promoting both Ireland and Northern Ireland overseas, the primary concern for Tourism Ireland in considering the proposal to abolish seasonal clock changes would be to ensure that the time zone of Ireland does not differ from that of the UK.

From an overseas tourism perspective, the most favourable outcome would be to opt for constant 'summertime' across the EU, if the UK chooses this approach also. A shift to a constant 'summertime' time zone – allowing for brighter evenings in the winter and autumn months – would help underpin Tourism Ireland's strategic objectives for 2019 and beyond which are focused on achieving greater sustainability through:

- extending the holiday season beyond the peak summer months and attracting more visitors in the autumn and winter months
- achieving greater dispersal of overseas visitors to the regions

Our understanding is that our colleagues in Fáilte Ireland are also in favour of a shift to constant 'summertime' across the EU, subject to this approach being taken by the UK also.

ENDS

Dear Minister Flanagan,

I write to offer my very strong opposition to the proposal to abolish seasonal clock changes in the EU. My reasons are as follows:

1. Ireland is suffering a major obesity challenge and one of the antidotes to this is to encourage people of all ages to engage in physical activity. The March change to summer time offers a powerful psychological impetus to such activity as well as the extra hour of daylight.
2. Irish citizens are chronically short of Vitamin D, the main source of which is sunlight – this can lead to a wide range of health problems, including memory problems in older people. A switch to summer time in March offers a small but significant increase in exposure to this essential vitamin.
3. If the above two points were to be addressed by a permanent summer time, then another major problem arises – darkness during travel to work or school in winter mornings, with implications as follows:
4. Permanent summer time during winter would result in no exposure to outdoor light for weeks on end during the darkest winter months. People – including many children – would leave home in the dark, go indoors to work or school and return home in the dark. This option is like recreating Arctic winter conditions.
5. Lack of daylight exposure in adolescents is associated with depression and disturbed sleep (https://www.stressforskning.su.se/polopoly_fs/1.302826.1476779861!/menu/standard/file/Gülçin%20september%202016.pdf). Exercise and sport are powerful antidotes to depression and related mental health problems in adolescents. The March change to summer time thus offers a crucial impetus to youth sport participation and hence offers a strong mental health potential benefit. Week after week of winter light deprivation under the permanent summer time option, on the other hand, could pose significant mental health risks in daylight-deprived younger people.
6. Permanent winter time, on the other hand, replicates the problems outlined in 1 and 2 above and is therefore also health-damaging.
7. Countries in northern latitudes such as Ireland need to have seasonal clock changes to allow humans to maximally adapt to the shorter winter, and longer summer, days. Mainland Europe countries do not have the problem of their children having to go to school in the dark and must not impose damaging policies on countries like Ireland.
8. Ireland is having difficulty delivering on its carbon use targets. A large scale German meta-analysis showed that for countries in northern latitudes, seasonal clock changes significantly reduced energy consumption (https://mpira.ub.uni-muenchen.de/74518/1/MPRA_paper_74518.pdf)

9. Finally, and perhaps most importantly, the psychological border that would be created between the Republic and Northern Ireland by a time change could be in the long term more damaging than any hard border. Nothing symbolises a move to a foreign country more than having to reset the time on your watch and devices. This would be as divisive as it would be dangerous to the fragile peace process and sense of trust across the border.

Yours sincerely,

Ian Robertson

Ian H Robertson PhD |Co-Director Global Brain Health Institute|

|Professor Emeritus Trinity College Institute of Neuroscience|

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Dear Sir/Madam,

Regarding the Consultation on Seasonal Clock Changes, I would be very grateful if you could please note our views against any change to constant winter time. The detrimental impact that that change would have on our club and community is described below.

We are a keen participant in outdoor watersport activities, from **scuba diving** to **snorkelling** and **beach clean** sessions. Through our club activities, we have formed a strong community of friends where we all share the same passion for the marine life and our ocean.

Our sport is very seasonal and highly depends on having long summer evenings which allow our members to travel to a dive site after work and participate in our sport, which usually takes 4/5 hours. It is during these ours that our members get to form a stronger bond with each other, which is an integral part of keeping our club and community active and alive.

I am very concerned about this proposal. Any change to the number of daylight hours in the summer evenings would drastically reduce the ability of our organisation and club to put on summer evening events safely on weekday evenings.

This proposed change would effectively eliminate all our weekly activities and closes the door of opportunity for those who are keen to get out and explore the world of underwater during the summer evening, which is the peak of our sport.

I would like to cast my vote and the majority of our club members, that we, UCD Sub-Aqua club disagree with this proposal.

Kind regards,
Mehdi

Mehdi Entezary
UCD SAC Captain/Chairperson


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Dear Dept of Justice,

I know there has been a survey done which has been vastly in favour of removing the clock changes on daylight saving hours across Europe. I don't know if people really would prefer it if it comes into practice, rather some might just be thinking of the annoyance of having to put it back and forwards every six months and the adjustment that takes.

I feel very strongly that Ireland should keep it's current arrangement on daylight saving hours for the following reasons:

1. First and foremost, it will put us out of sync with Northern Ireland which will add further to the feeling of separation, in light of Brexit. It will also impact businesses and trading across the border if we are at a different time of business hours in our own country, and at a different time to our nearest neighbours, with whom we have huge business dealings. Brexit is bad enough for us and for England – this will only add to it!
2. If we keep the clocks on summer time, it will be dark in winter until 9.37 and still gets dark again at 17.07 – so it doesn't really give us any further daylight benefit outside of working hours. This will give rise to more road traffic accidents and further risk to life. There will be an increase in incidences of Seasonal Affective Disorder and depression, and god knows we have enough problems with suicide in this country. There will be more danger to children travelling to and from school – both in terms of traffic and other predatory risks. Energy usage will rise in both homes and businesses with the longer hours of darkness.
3. If we were then to keep the clocks on winter time, we would again be at a disadvantage for daylight hours, with sunrise starting at 3.50am – a time when most workers are still in bed. The hottest part of the day would be mid-morning and we would lose the lovely long stretch in the evening, giving rise to higher energy bills for electricity and lighting & heating, at a time when Ireland needs to reduce its energy consumption. The earlier evening is also one less hour that tourists are out and about boosting the Irish economy.
4. If it's not broken – why fix it? As far as I'm aware the clocks didn't change in this country once before (1968?) and reverted immediately to daylight saving hours. Though I don't know the exact reason, if it's because it didn't work well, can we not learn from that exercise and not reinvent the wheel?
5. In both instances, 1 hour of proper daylight will be removed from our days, and we will be in the dark for an extra hour in our day.

Finally, I would question who is really benefitting from the removal of daylight saving hours, and the effective removal of one daylight hour from each season? The energy companies are the only ones that I can think of who will benefit from this, so I really hope that the Dept of Justice doesn't go ahead with removing the daylight saving hours from Ireland.

Thanks for your time.

Debbie

Ps – your summertime arrangement illustration is very good – sadly though, the vast majority of people I talked about it though, didn't realise there was a public consultation. Could this not have been made more prevalent in social networks and other media?

Debbie Curran

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Dear Mr O'Brien,

I wish to advise that we have no specific views on Seasonal Clock Changes.

Kind regards

Des

Dr Des Fitzgerald

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OLLSCOIL LUIMNIGH

Tabhair faoi deara go bhféadfaí díriú ar theachtaireachtaí ríomhphoist chuig an Ollscoil, ón Ollscoil nó lastigh den Ollscoil féin mar ábhar d'iarratais faoin Acht um Shaoráil Faisnéise 2014 agus/nó faoi an GDPR / na hAchtanna um Chosaint Sonraí.



28th November 2018

Dept of Justice and Equality,
51 St. Stephen's Green,
Dublin 2,

Consultation on Seasonal Clock Changes- Submission from the Western Development Commission

Dear Sir or Madam,

The Western Development Commission would like to make a very brief submission to the consultation on seasonal clock changes. The WDC is a statutory agency which operates under the aegis of the Department of Rural and Community Development (DRCD). The WDC's aim is to foster and promote the economic and social development of the Western Region¹.

The main issue of concern to us is that in parts of the Western Region sunrise and sunset times can be up to 15 minutes after those in Dublin (for which you provided the data in consultation document). This means that in mid-winter, the mornings are darker for longer in the West (although of course we also have daylight for slightly longer in the evening).

According to your consultation document sunrise on 20 December in Dublin is currently 08:37 on 'wintertime'. At the end of December in some places in Mayo, Galway and Donegal sunrise is at 08:58. We would be concerned that if there was a decision to remain on 'summertime' all year in parts of the Western Region sunrise would not be until almost 10:00 in late December (09:58 in both Achill and Gweedore, for example, see <https://www.timeanddate.com/>).

In this situation, while the brighter evenings would of course be very welcome in the summer time, we would be concerned that early morning travel and activities in the winter would be more difficult. In addition they could potentially be more dangerous when the weather is cold as frost and ice will thaw later if 'summertime' were to be in place for the whole year. This is of particular concern as the Western Region is largely rural and many journeys are taken on untreated regional and local roads.

We are conscious, however, that if most of Europe were to opt to stay on 'summertime' and we were to remain on 'wintertime' there would be a two hour time difference, which could have some impact on business activity and social interaction.

¹ Donegal, Sligo Leitrim, Mayo, Roscommon, Galway and Clare

This consultation asks three important questions to which we respond below:

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

While there are some negative aspects associated with the clocks changing twice yearly, it has been an effective policy to ensure that people have the best opportunity to make use of daylight. We would also note that while the EU is considering stopping the practice, as one of the more northerly member states, the effect of the change will be greater for us than for many parts of Europe.

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

Given the points we have made above, particularly in relation to winter mornings we believe it would be preferable to remain on winter time.

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

If this change were to give rise to a different time zone in Northern Ireland (and in the rest of the UK) we believe that this would cause difficulties both for business and for social interaction. This would particularly be the case for those close to the border but would affect everyone as there are so many links between Ireland and the UK.

We are pleased to have the opportunity to make this submission. Please do get in touch if you have any queries or would like to discuss it further.

Regards

Dr Helen McHenry

Policy Analyst,
Western Development Commission