



An Roinn Dlí agus Cirt
agus Comhionannais
Department of Justice
and Equality

Report of the Interdepartmental Group on EU Proposal to Discontinue Seasonal Clock Changes

July 2019

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Following a resolution from the EU Parliament in February 2018 to reconsider seasonal clock changes and an EU wide consultation last summer, in September 2018 the EU Commission published a proposal to abolish the twice-yearly clock change. Under the current version of the proposal, the practice of a twice-yearly clock change would cease from 2021.

In order to gauge the opinion of the public, industry and other stakeholder groups on the island of Ireland, as well any additional or unforeseen implications of the proposal, a public consultation was held. The Department of Justice and Equality led the consultation process which comprised an opinion poll, a public survey and submissions from key stakeholder groups. The opinion poll included a sample of 1,000 respondents aligned with the national population. Over 16,000 responses were received for the survey and over 50 submissions were made by key stakeholders.

While all exercises found that a majority are in favour of discontinuing the clock change, this position is tempered by potential implications. In particular, it was found that when the question of two time zones on the island of Ireland is raised as a possibility, the majority are in favour of avoiding this situation. The impact on Northern Ireland is particularly complex given the UK's withdrawal from the EU and the fact that the UK will not be bound by whatever EU legislation is adopted arising from this proposal. The UK is not in favour of the proposal, but it is not known what position it would actually take if the EU adopts the legislation.

Since the publication of the proposal, a number of Member States have commenced national consultation processes to decide their positions. In addition, the proposal has been the subject of ongoing discussions at EU working party and Council level. Considerations as to the position being adopted by neighbouring countries is a common concern for all Member States. The existing arrangements in Directive 2000/84/EC provide clarity for the operation of the internal market and for the public generally. The uncertainty around the harmonisation issue underlines the attractiveness of the current arrangements. The revisions suggested to the draft proposal by the EU Parliament include a requirement to establish a coordination mechanism across Member States in order to ensure the market harmonisation is preserved.

The research cited by both the EU Parliament, Commission and various stakeholders who responded to the public consultation bears testament to the fact that the evidence of the benefits associated with ending the practice of twice-yearly clock changes is inconclusive. Many Member States have raised concerns on the absence of an impact analysis and asked the Presidency to conduct a more thorough review of the basis for the proposal.

Conclusion

In view of the absence of significant evidence to support changing the status quo, the risk to market harmonisation, increased administrative burden across the EU and the concerns raised regarding the Northern Ireland/UK position, the recommendation is that Ireland should not at this time support a proposal which could result in different time zones on the island of Ireland, and which does not contribute positively to the functioning of the Single Market.

Section 1 - Introduction

Scope of this report

This report outlines the consideration of the Proposal for a Directive of the European Parliament and of the Council discontinuing seasonal changes of time and repealing Directive 2000/84/EC.

An interdepartmental Steering Group was established in September 2018, chaired by the Department of Justice and Equality, to guide a public consultation exercise involving all relevant stakeholders. The terms of reference of the group were to

- Consider the EU Commission Proposal
- Input into briefing for discussions at Working Group and Ministerial level
- Have oversight of a public consultation exercise with all relevant stakeholders
- Develop conclusions and recommendations for a report to Government

The group met on five occasions between October 2018 and March 2019 (see Appendix A for membership).

History of Summer time arrangements

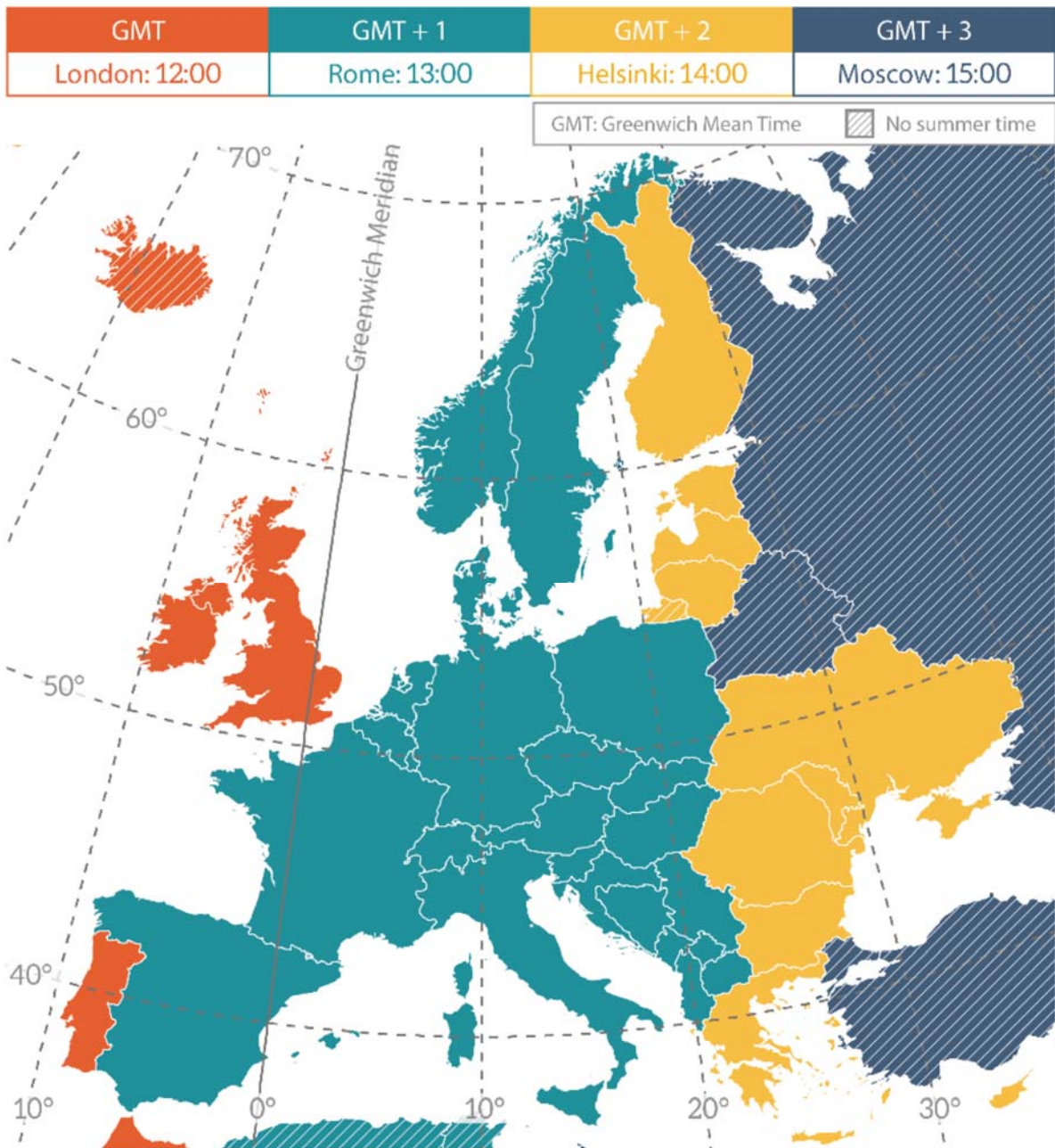
Summer time arrangements in the EU require that the clocks are changed twice per year in order to cater for the changing patterns of daylight and to take advantage of the available daylight in a given period.

The majority of the EU Member States have a long tradition of Summer time (also known as Daylight Saving Time) arrangements, most of which date back as far as the First and Second World Wars or to the oil crisis in the 1970s. At the time, summer time arrangements were mainly designed to save energy. However, there have also been other motivations, such as road safety, increasing leisure opportunities stemming from longer daylight during evenings or simply to align national practices to those of neighbours or main trading partners.

EU legislation on Summer time was first introduced in 1980. Since 2001, Summer time arrangements have been governed by EU Directive 2000/84/EC which sets out the obligation on all Member States to switch to Summer time on the last Sunday of March and to switch back to their standard time (Winter time) on the last Sunday of October. The objective of the EU Directive was to harmonise existing national arrangements that were diverging, thereby ensuring a harmonised approach to the time switch within the single market.

The practice is particularly widespread in Europe, North America and Oceania. With the exception of Iceland, Russia, Belarus and Turkey, which have abolished DST, all non-EU European countries have aligned themselves with the EU's summer-time schedule; this facilitates *inter alia* cross-border trade, transport, communications and travel (European Parliament Research Service, 2017).

In parallel to, and independent from, the EU Summer time arrangements, territories of the Member States on the European Continent are grouped over three different time zones or Standard times. The decision on the Standard time for each Member State is taken individually by each MS for its entire territory.



Source: EPRS based on information from timeanddate.com and the European Commission

Currently there are three standard time zones in the EU:
 Western European Time (Ireland, Portugal, UK),

Central European Time (17 Member States)

Eastern European Time (Bulgaria, Cyprus, Estonia, Finland, Greece, Latvia, Lithuania and Romania).

Note: Ireland is on GMT during the Winter time period and moves to GMT+1 in Summer time.

Position in Ireland

Summertime is governed in Ireland by the Standard Time Act 1968, which was amended in 1971 by the Standard Time (Amendment) Act 1971 to provide for Winter time. SI 506/2001 is the most recent amendment to this legislation, standardising the time of the clock change at 1am in line with the 2000 EU Directive. Winter time begins at 1.00am Greenwich Mean Time (GMT) on the last Sunday in October every year when the clocks are put back by one hour. Winter time ends at 1.00am GMT on the last Sunday in March of the following year when the clocks are put forward one hour, signalling the start of summer time.

Ireland and the UK abolished Summer time arrangements in 1968 to harmonise with the rest of Europe but switched back again in 1972. In the UK, a White Paper was published in 1970 reviewing the trial which concluded that it was impossible to quantify the advantages and disadvantages of British Standard Time. The trial was the subject of a House of Commons debate on 2 December 1970 when they voted by a large majority to end the experiment.

To enable Ireland to keep in line with Britain, the Oireachtas enacted the Standard Time (Amendment) Act, 1971. The public were consulted when the Bill was being drafted and the majority were in favour of maintaining the link. When the Bill was debated in the Oireachtas, the Minister for Justice commented “ *The great majority of the bodies and organisations that were consulted, which included the major State-sponsored bodies, were in favour of our preserving parity with Britain. Slightly more than 300 private persons gave their views on the matter in letters to my Department. There was a fairly even balance as between those in favour of and those against a change to preserve parity with Britain, slightly more than half being in favour. The Government are satisfied that the weight of representative opinion is in favour of our keeping in line with Britain* “.

There has been intermittent public discourse in respect of the practice in intervening years but no demand for change. The discussion has primarily been driven by the position at EU level and focussed on market harmonisation considerations. As outlined earlier, EU legislation was first introduced in 1980 in recognition of the need for harmonisation in arrangements across Member States. The current EU Directive was adopted in January 2001.

More recently, on 30 November 2011, the Joint Committee on Justice, Defence and Equality met to discuss the socio-economic and other implications of the Autumn and Spring time adjustment arrangements. At that meeting, the following groups made statements to the Committee:

- The Irish Farmers Association (IFA)
- The Irish Small and Medium Enterprise Association (ISME)

- The Department of Jobs, Enterprise and Innovation.

The Committee did not report at that time. Summer time arrangements were further considered by the Committee in 2013/14 in the context of a Private Members Bill – the Brighter Evenings Bill.

The Bill proposed that Ireland would change time zone to align with Central European Time (CET) year round whilst continuing the practice of twice-yearly clock changes. (A similar Bill was considered by the UK in 2012.) The Bill had two key provisions which required the Minister for Justice and Equality to:

- Prepare and publish a report on the costs and benefits of advancing clocks by one hour to align with CET, having regard to the interests of Northern Ireland, within 12 months; and
- Conduct a three-year trial of that arrangement to monitor the positive and negative effects of the time change.

Following the second stage debate in July 2013 and, with the agreement of the sponsoring Deputy, Tommy Broughan, T.D., the Bill was referred to the Joint Committee on Justice, Defence and Equality to examine the matter. The Committee invited submissions which might be relevant to the issues raised at debate stage and received 22 written submissions. Of the 22 submissions received, 20 were from individuals.

In December 2014, following consideration of the matter, the Committee advised the Minister for Justice and Equality of its recommendations:-

“The Committee recommends that, on the basis of submissions received, the Minister keeps any proposed initiative on this matter under review and continues to give consideration to any possible benefits. The Committee further recommends that the consideration of any trial be coordinated as a joint venture with the United Kingdom, should it consider a similar trial.”

The Committee raised a concern regarding the impact of darker mornings for schoolchildren, commuters and businesses. They referred to the American system which provides for Daylight Saving Time for a higher proportion of the year and submitted that this could be considered in the event of a future review of EU legislation.

In response to subsequent queries, the Minister has said *“Having considered the report and noted the recommendations made, my Department continues to keep the matter under review, including the question of a joint trial with the United Kingdom. However, particularly in light of the current context arising from the UK’s decision to exit the European Union, I have no immediate plans to pursue this at present”*.

Section 2 - Background to current EU proposal

Parliament Resolution

On 8 February 2018, the EU Parliament backed a resolution (Appendix B) calling for an examination into ending daylight saving time (Summer time).

The EU parliament referred this matter to the EU Commission to consider discontinuing the practice primarily on the grounds of the negative impacts on health of the current arrangements. This resolution highlighted that numerous scientific studies, including the European Parliamentary Research Service study of October 2017 (EPRS study), have failed to come to a conclusive outcome, but have instead indicated the existence of negative effects on human health. It also cited the citizens' concerns highlighted round the biannual clock changes.

The EPRS study acknowledges that it draws largely on a TAB¹ report for the German Bundestag in February 2016 as the most comprehensive study ever undertaken on the topic, for its conclusions on sectoral implications. That report concluded

'Altogether, it can be concluded that the available scientific evidence base and state of knowledge with regard to possible implications of DST is still very limited and rather fragmentary. Nevertheless, it does not reveal any indications that the application of DST would induce serious positive or negative implications for energy consumption, economy or health. In this respect, the question whether the current DST arrangements will be maintained, amended or abandoned will continue to be – for the foreseeable future – the subject of political and public debates which can rely on scientific facts only to a very limited extent.' (English summary, p. 4)

Regarding health impacts, the Bundestag researchers undertook a comprehensive review of the recent scientific literature in the areas of sleep patterns, the circadian rhythm, the risk of heart attack, accidents at the work place and psychological effects (e.g. suicide rates, life satisfaction). According to the TAB report, new scientific findings suggest that the human biological rhythm adjusts less easily to the spring clock change than previously thought. Contrary to previous assumptions, according to which the transition phase would last only a few days, newer research suggests that it may take certain chronotypes of people several weeks to adjust; some appear not to adapt at all. The effect of the fall back in autumn poses fewer problems. The TAB report concludes that the 'relevant impact of disturbances in the biological rhythm due to time change on human health is still unclear' and recommends further in-depth research regarding the process of adaptation to the time change.

¹ Office of Technology Assessment at the German Bundestag (TAB), an independent science institution that advises the German Bundestag and its committees on questions of scientific and technological change

Commission examination

In response to the European Parliament resolution, the Commission committed to assess the two main policy alternatives available to ensure such a harmonised regime:

1. **Keeping the current EU summertime arrangements** as set out in Directive 2000/84/EC, or
2. **Discontinuing the current bi-annual time changes for all Member States** and prohibiting periodic switches; again this would not affect the choice of time zone, and it would ultimately remain each Member State's decision whether to go for permanent summer or winter time (or a different time).

Consultation

The Commission initiated a public consultation in July 2018 to gather views from citizens, stakeholders and Member States. In launching the consultation, the EU Commission cited feedback from citizens and Member States. Citizens reference what they perceive as negative health impacts of the disruptive time change relating to sleep deprivation and other kinds of negative consequences. However, some citizens also ask that the current system be maintained, as they believe it has positive effects. Some Member States have asked the Commission to reconsider the system. Specifically, Finland has asked that the bi-annual time switch be abandoned and Lithuania has called for a review of the current system in order to take into account regional and geographical differences.

The Commission acknowledged that “Available evidence suggests that common rules in this area are critical to ensure the proper functioning of the internal market. This is also supported by the European Parliament, which in its resolution stated that it is crucial to maintain a unified EU time regime”.

The EU consultation was undertaken from 4 July to 16 August 2018. The consultation process generated 4.6 million replies which represents 0.9% of the EU population (based on Eurostat population figures).

Report

The Commission published a report of the results of the consultation process on 12 September 2018. The Commission report makes reference to a number of studies which have been carried out over the years on Summer time and reports prepared for the Commission, all of which have failed to come to a conclusive outcome.

The report comments in some detail on the responses received to its consultation exercise. 99% of the responses received were from citizens. 84% of responses favoured discontinuing the bi-annual clock changes while 16% wanted to keep them. The three largest response rates were from Germany (70%) followed by France (8.6%) and Austria (6%). Significantly, less than 1% (0.24%) of the Irish population responded. This response rate was reflected across a number of Member States, Spain, UK, Italy, Denmark for example². It is noted from the report that the Road Safety Authority of Ireland shared an existing report with the Commission as part of their response to the consultation.

Based on the outcome of the consultation, the Commission formulated a proposal for ending the existing arrangements.

The Proposal presented

At the State of the Union address on 12 September, President Juncker announced that the European Commission was proposing to end the bi-annual changing of the clocks in 2019. The Commission published its proposal for a Directive of the European Parliament and of the Council discontinuing seasonal changes of time and repealing Directive 2000/84/EC on that date. A Presidency compromise proposal was published on 16 October 2018 changing the date to 2021 to end clock changes.

The proposal as currently outlined is

- the last mandatory change to Summer time would take place on 28 March 2021 after which,
- Member States who wish to remain on Winter time would make one last seasonal clock change on 31 October 2021. This decision must be notified to the Commission by 1 April 2020.
- Member States will remain free to choose their Standard time, on the condition that they give 18 months' notice to the Commission.

² The United Kingdom response rate was the lowest among the 28 Member States.

Legal Basis

As the objective of this proposal is to ensure the proper functioning of the internal market. Article 114 of the Treaty on the Functioning of the European Union (TFEU) is the legal basis. This is also the legal basis of Directive 2000/84/EC. The measure as drafted does not envisage a derogation for any Member State.

Council Legal Service views

In November 2018, the Council Legal Service (CLS) advised Article 114 TFEU is an appropriate legal base. At the Land Transport Working Group meeting of 4 April 2019, following a request supported by a number of Member States, the Presidency agreed to seek a written legal opinion from Council Legal Service on the appropriateness of using Article 114 – an Internal Market legal basis – as a basis for discontinuing the bi-annual practice of changing the clocks to summertime/wintertime. That opinion issued in June 2019 and its summary conclusion was as follows:

the choice of the new hourly system and the obligation for the Member States to choose the permanent legal time are not sufficiently justified in the light of the principles of proportionality and subsidiarity, in particular because of the lack of examination of any solution intermediary to ensure the proper functioning of the internal market.

Member States discussion

The proposal was first discussed at the Land Transport Working Group on 13 September 2018. Many Member States, including Ireland, said that the matter was complex and the timeframe in the proposal too ambitious, particularly as extensive national consultations would need to take place and the likely approach of neighbouring countries was very important. The EU proposal remains under discussion with Member States who are currently working on the basis of a revised proposal which would see changes take effect from April 2021.

The matter was included for a progress report on the agenda of the Transport Telecommunications and Energy (TTE) Council in Transport configuration on 3 December 2018. During interventions, Member States highlighted the requirement for more time for consultation and to analyse this issue more thoroughly. The necessity to have a harmonised approach was also a key issue across Member States.

The Presidency concluded that Member States needed more time for further consultations both internally and between themselves before the Council can agree its position. An update on this file was provided by the Presidency at Transport Council on 6 June and the proposal will now fall to the Finnish Presidency.

This file is under ordinary legislative procedure (formerly called co-decision) which requires the agreement of the European Parliament, European Commission and Council of Ministers. After amendments to the proposal prepared by the TRAN Committee, the European Parliament plenary voted in favour of the Parliament position on 26 March. Trilogue negotiations can only commence between the Parliament, Commission and Council once the Council agrees the General Approach. Eventual agreement to the outcome of the trilogue negotiations in Council will be by Qualified Majority Vote and in the European Parliament by a further Plenary vote.

At the majority of working groups, support for the proposal has generally been stronger from the northern Member States. Based on indications of support at those meetings, 14 Member States have indicated support for the current proposal with the balance either against or reserving judgement pending national consultations, an impact assessment and/or the Council Legal opinion.

UK position

During discussions at the working groups, the UK has opposed the proposal. Officials from the Department of Justice and Equality and the Department of Foreign Affairs and Trade met with the UK Department for Business Energy and Industrial Strategy to discuss the proposal on 22 November 2018. The following are particular issues for them:

- Following their last consideration of the issue in 2015 there was no UK-wide consensus on the matter; a UK Government proposal at that time for a three-year trial of moving to Central European Time was abandoned after opposition from Scotland and northern England, where some areas would not have seen daylight until 10am during winter; and
- UK France electricity interconnector and impact on supply and pricing.

It is noted that on the 22 October 2018, the UK House of Lords published a reasoned opinion objecting to the EU's proposal to discontinue seasonal clock changes.

While the reasoned opinion recognised that the harmonisation of Member States' seasonal time changes is beneficial to the proper functioning of the EU internal market, it went on to state that it did not believe that the Commission had adequately explained or justified the need for this EU intervention. It concluded that that the Commission's proposed Directive ending seasonal changes of time did not comply with the principle of subsidiarity.

The UK may or may not be bound by the proposal depending on the timing of their exit from the EU.

NI position

Contact was made with the Northern Ireland Executive Office from where consideration of this proposal is being coordinated. No official position has been formalised at this point.

An issue which does arise is that timescales, time zones and the subject matter of the Summer Time Act, 1972 are reserved to Westminster for Scotland and Wales but no equivalent reservation has been identified for Northern Ireland. However, the Northern Ireland Act 1998 does provide that obligations under EU law are an excepted matter and the Summer Time Order 2002, setting the date and time for seasonal clock changes and which amended the 1972 Act, is a single instrument which extends to Great Britain and Northern Ireland.

Any position will be influenced by the fact that the UK is due to withdraw from the EU and after its withdrawal and expected transition period, will not necessarily be bound by any new measure adopted. If the UK continues to change clocks twice yearly, while Ireland ceases the practice, there could be a period of up to seven months each year during which the two jurisdictions on these islands would be on different time zones.

Section 3 - Work of the Interdepartmental group and public consultation exercise

In order to gauge the opinion of the public, industry and other stakeholder groups on the island of Ireland, as well any additional or unforeseen implications of the proposal, a public consultation including an online survey and open stakeholder submissions were held and an opinion poll commissioned. While all exercises found that a majority are in favour of discontinuing the clock change, this position is tempered by potential implications. In particular, it was found that when the question of two time zones on the island of Ireland is raised as a possibility, the majority are in favour of avoiding this situation.

This was evident in the Amárach Research December omnibus survey when 1000 respondents answered questions on time change. The results do reflect a majority support abolishing the twice-yearly clock change but also that 82% of respondents would not be in favour of any measure that results in a different time zone between Ireland and Northern Ireland; again with similar support across all demographics.

Irish public consultation

The Department of Justice and Equality launched a public consultation on Friday 26 October 2018, which ran until Friday 30 November 2018. The consultation exercise comprised a public survey and general submissions from individuals and stakeholders. In launching the public consultation, the Department outlined the expected impact of each time choice as compared with the current summer and winter time daylight hours.

For Ireland, the impact of these two choices would result in the following outcomes:

Opting for year round **summer time** would mean that it would be daylight one hour later in the morning than we currently experience during winter time and we would gain daylight at evening time e.g. on the shortest day of the year, it would be light from about 9.40am until nightfall at about 5.10pm.

Remaining on **winter time** would mean that it would be daylight one hour earlier in the Summer than at present and get dark one hour earlier in the evening, e.g. on the longest day of the year, it would be daylight from about 4am until nightfall at about 9pm.

Table 2: Time of sunrise and sunset in Dublin city at four dates throughout the year under the current system of the clocks going backwards and forwards

Current arrangements			
	Sunrise	Sunset	Day length
20 Mar	6:26	18:39	12:13
20 June	4 :56	21:56	17:00
20 Sept	7:07	19:27	12:20
20 Dec	8:37	16 :07	7:30

Table 3: time of sunrise and sunset in Dublin city at the same dates if we were to stay on constant “winter time” or “summer time”

	Constant “winter time”		Constant “summer time”		
	Sunrise	Sunset	Sunrise	Sunset	Day length
20 Mar	6:26	18:39	7:26	19:39	12:13
20 June	3:56	20 :56	4:56	21:56	17:00
20 Sept	6:07	18:27	07:07	19:27	12:20
20 Dec	8:37	16 :07	9:37	17:07	7:30

Source: NOAA

<https://www.esrl.noaa.gov/gmd/grad/solcalc/sunrise.html>

Opinion poll

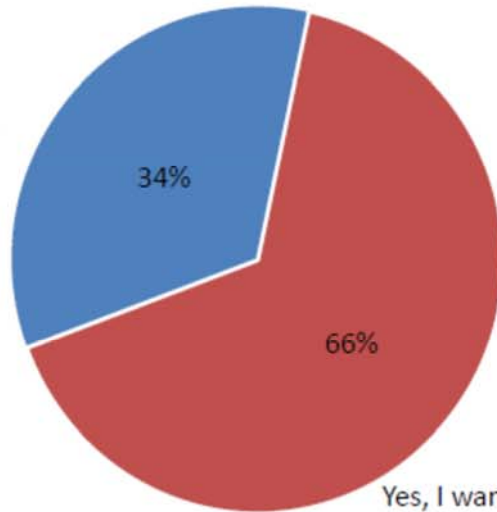
In addition to a survey, the Department commissioned a number of questions on the Amárach Research December omnibus survey. This consisted of 1000 respondents with quotas set on gender, age, social class and region to achieve a sample aligned with national population. The results reflect a majority (66%) support abolishing the twice-yearly clock change, with broad support across all demographics. 77% would prefer Summer time, with similar support across all demographics. The opinion poll also reflects that 82% of respondents would not be in favour of any measure that results in a different time zone between Ireland and Northern Ireland; again with similar support across all demographics (slightly higher for respondents aged 45-54 and those located in Connaught/Ulster).

2 in 3 are in support of abolishing the twice yearly clock change, with broad support across all demographics

(Base: All respondents – 1,000)

Support for abolishing the twice yearly clock change

No, I prefer having the clocks go forward an hour in spring, and back an hour in autumn



Yes, I want to have the same time all year round

	Male (Base: 490)	Female (Base: 510)
Yes	69%	63%

	Aged 18-24 (Base: 110)	Aged 25-34 (Base: 190)	Aged 35-44 (Base: 210)	Aged 45-54 (Base: 180)	Aged 55+ (Base: 310)
Yes	52%	61%	66%	69%	72%

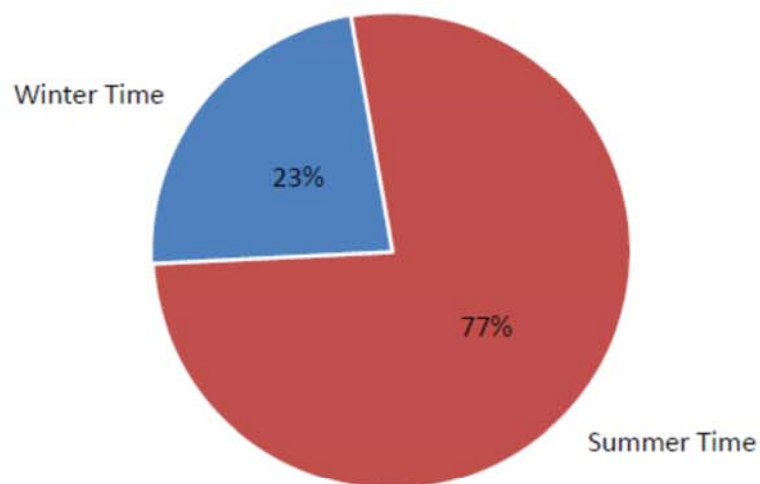
	Dublin (Base: 290)	ROL (Base: 260)	Munster (Base: 270)	Conn/Ulster (Base: 180)
Yes	64%	68%	69%	62%

	ABC1F50+ (Base: 465)	C2DEF50- (Base: 535)
Yes	67%	65%

Over 3 in 4 would prefer Summer Time over Winter Time, with similar support across all demographics

(Base: All respondents – 1,000)

Summer Time or Winter Time?



	Male (Base: 490)	Female (Base: 510)
Summer Time	80%	73%

	Aged 18-24 (Base: 110)	Aged 25-34 (Base: 190)	Aged 35-44 (Base: 210)	Aged 45-54 (Base: 180)	Aged 55+ (Base: 310)
Summer Time	75%	76%	78%	76%	77%

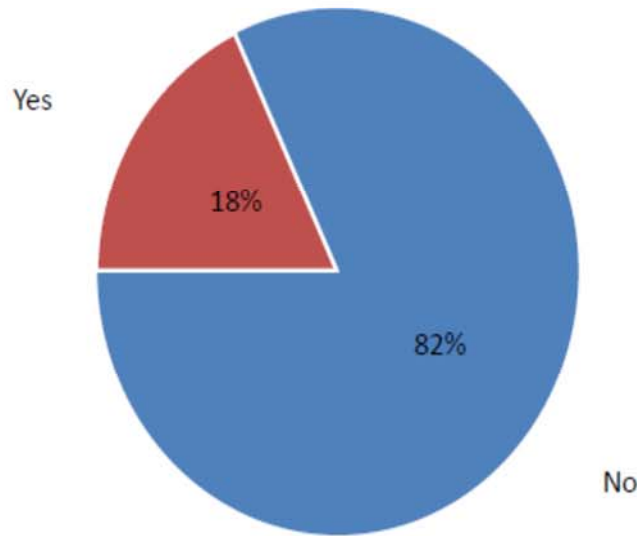
	Dublin (Base: 290)	ROL (Base: 260)	Munster (Base: 270)	Conn/Ulster (Base: 180)
Summer Time	77%	78%	76%	75%

	ABC1F50+ (Base: 465)	C2DEF50- (Base: 535)
Summer Time	77%	76%

Over 4 in 5 would not be in favour of any measure that results in a different time zone between Ireland and Northern Ireland

(Base: All respondents – 1,000)

Would you be in favour of any measure that would give rise to different time zones between Ireland and Northern Ireland?



	Male (Base: 490)	Female (Base: 510)
No	82%	82%

	Aged 18-24 (Base: 110)	Aged 25-34 (Base: 190)	Aged 35-44 (Base: 210)	Aged 45-54 (Base: 180)	Aged 55+ (Base: 310)
No	72%	70%	80%	91%	89%

	Dublin (Base: 290)	ROL (Base: 260)	Munster (Base: 270)	Conn/Ulster (Base: 180)
No	76%	80%	84%	91%

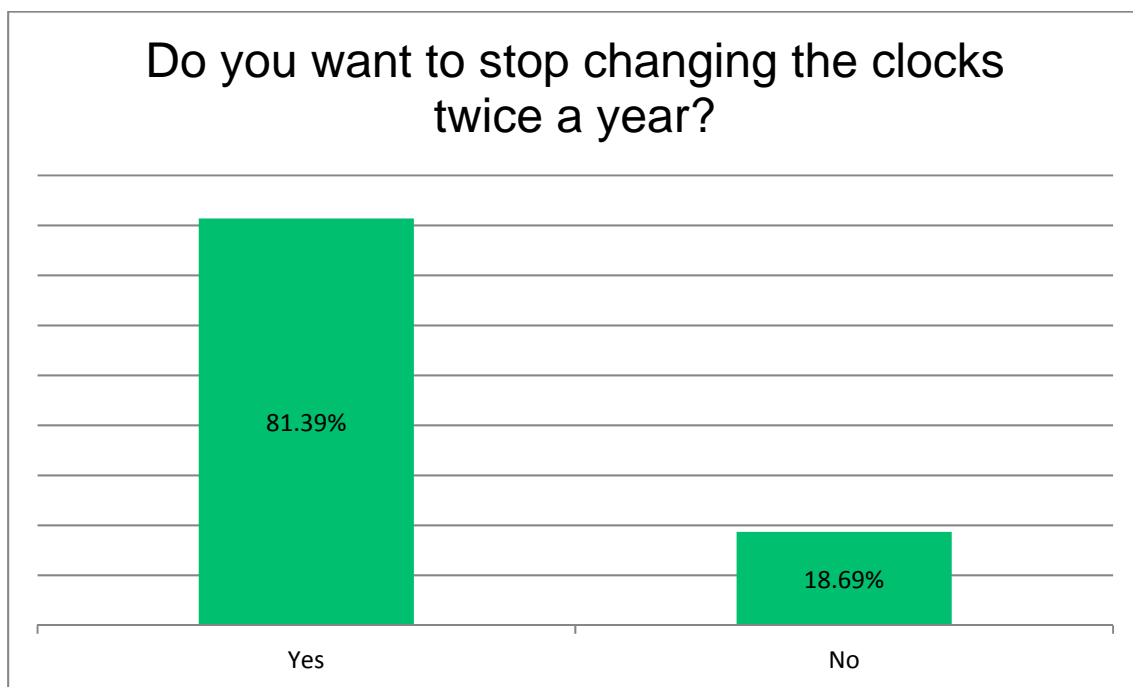
	ABC1F50+ (Base: 465)	C2DEF50- (Base: 535)
No	80%	84%

Public Survey

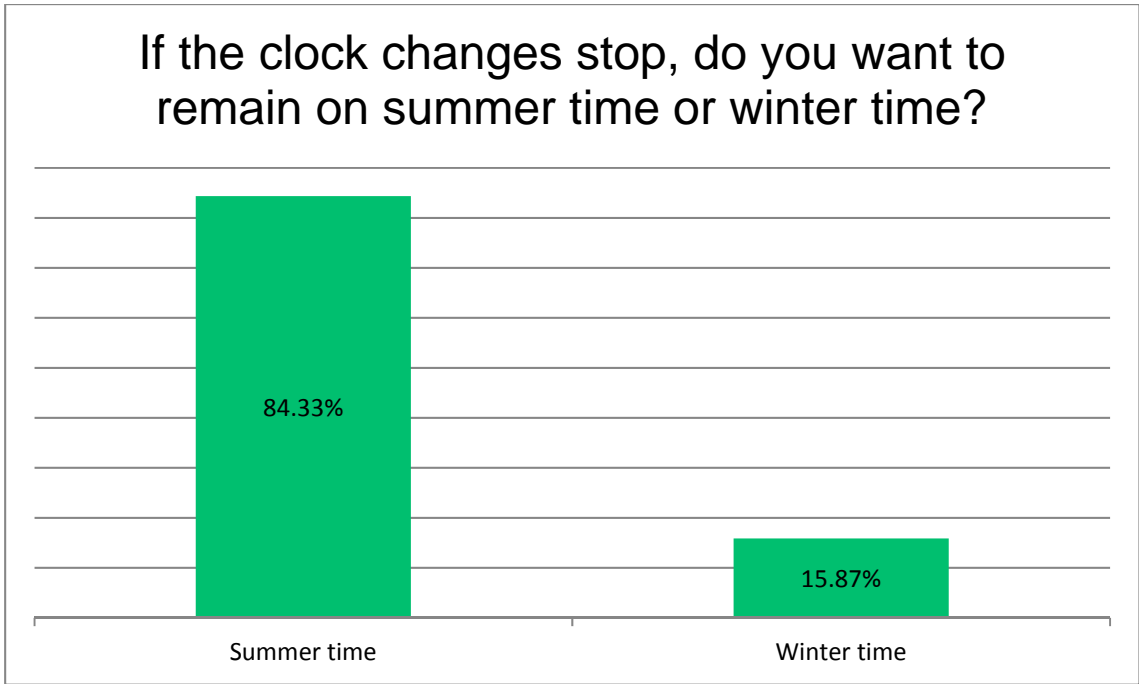
In a public survey, the following questions were asked

1. If responding on behalf of an organisation please give your name and the name of the organisation (for verification purposes).
2. Do you want to stop changing the clocks twice a year?
3. If the clock changes stop, do you want to remain on Summer time or Winter time?
4. What would your opinion be if this proposal were to give rise to different time zones between Ireland and Northern Ireland?

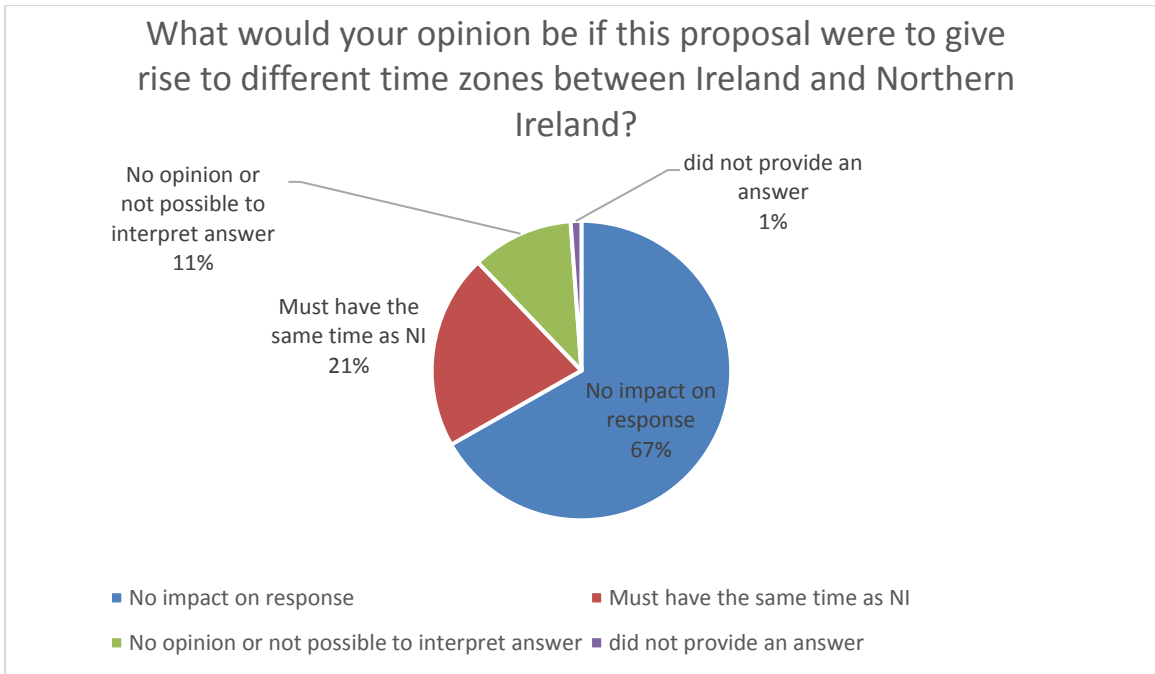
A total of 16,198 individual responses were received to the survey³.



³ The consultation set out what is meant by the various options for consideration. However, the concept is a complex one. In popular discourse, the concepts around the seasonal clock changes are discussed loosely and not always accurately, which in turn carries a risk in terms of interpreting the results of the survey.



In summary, 81% of responders indicated that they were in favour of ending seasonal clock changes with 84% favouring summer time over winter time.



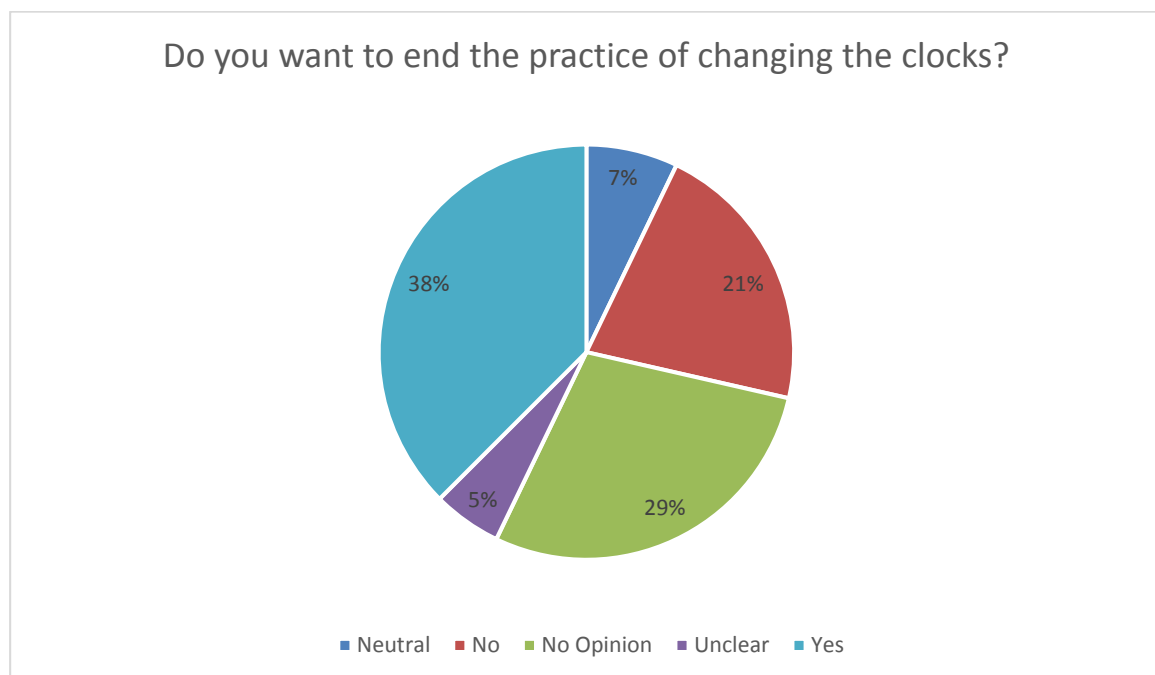
In the survey, the public were asked what their opinion would be if the proposal were to give rise to different time zones between Ireland and Northern Ireland. This was a free text field and therefore the response rates represented in the graph are indicative.

Submissions received

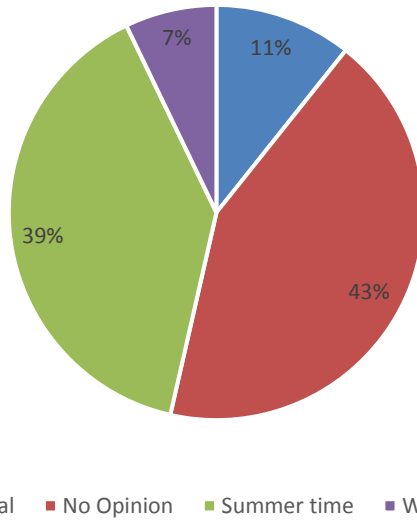
In addition to the public invitation to answer the survey or provide submissions to the Department, a total of 401 stakeholders were invited to make submissions. This was based on the key stakeholder groupings identified by each Department for their sectors.

A summary of all responses received is included at Appendix C. This comprised 114 submissions from individuals (in lieu of responding via the survey) and 56 stakeholder responses. While stakeholders were not asked specific questions, many submissions received structured the responses on a similar basis to the survey.

Of the stakeholders who provided comments, 38% indicated that they were in favour of ending the practice of seasonal clock changes while 21% indicated that they would prefer to maintain the current system. 36% were either neutral as to the outcome or did not indicate an opinion. 5% of the responses were unclear.



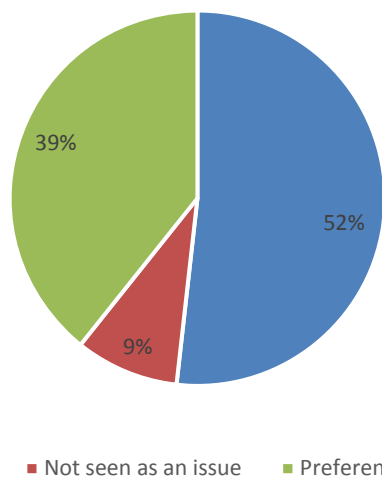
Is your preference to remain on summer or winter time?



With regard to a preference for summer or winter time, only 46% of stakeholders indicated a preference and the majority of those would prefer Summer time. However, 54% of stakeholders did not comment one way or another as to their preference.

39% of stakeholder responses indicated a preference for maintaining the same time zone as Northern Ireland. 52% did not comment on this aspect.

How do you feel about the possibility of a different time in NI?



The stakeholder submissions (summarised at Appendix D) ranged from Sports and Leisure activity groups, Transport, Health to Educational and Agricultural bodies.

Observations received on the proposal

Specific comment on Northern Ireland question

For those stakeholders who commented on how a different time zone in Northern Ireland impacted them, the responses related primarily to cross border trade, energy/utility provision and education. Four submissions were received from stakeholders in Northern Ireland, which highlighted the difficulties for those near the border, who were accessing education, engaged in community activities or doing business across the border.

With regard to interpreting the responses regarding a possible different time zone in Northern Ireland, because that was a free text field, it did not lead to a quantifiable response. Approximately 60% of submissions offered no specific opinion with regard to this question. In contrast, the opinion poll commissioned, which asked a direct question on this issue, resulted in 82% of respondents indicating that they would not be in favour of any measure that results in a different time zone between Ireland and Northern Ireland.

The sectoral comments raised by those who made submissions are outlined below.

Transport and Tourism sectors

A joint industry position paper was received from Airlines for Europe (A4E), the European Regions Airline Association (ERA) and the International Air Transport Association (IATA) in advance of the launch of the public consultation exercise. It outlined that those bodies and their respective members, are concerned about the proposal to abolish current 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. The bodies urged the Member States and European Parliament to consider the significant repercussions and disruption to passenger and freight connections when adopting their position. They particularly pointed to impacts around

- The complexity of revising all airline schedules in Europe
- The disruption to international connectivity
- Operational restrictions which further reduce schedule changes
- The need for synchronisation and a long lead time if the proposal proceeds

A4E, ERA, IATA and their members would prefer to remain with the current situation. If not, their preference was for summer time and for the proposal to be deferred to 2021 or later.

This position was reiterated by individual members and other air travel representatives who made submissions under the consultation.

From a tourism perspective, both Tourism Ireland and the Incoming Tour Operators Association of Ireland favoured changing to year round Summer time, pointing to the benefits this would offer in terms of more daylight in the late evening. However, as the organisation that promotes the island of Ireland overseas, it would be Tourism Ireland's preference that the time zone of Northern Ireland (and Great Britain) would be the same as that of Ireland.

Road Safety

The Road Safety Authority (RSA) did not make a new submission in response to the Irish consultation but referenced the report it completed in 2015 which was submitted to the EU in summer 2018. The report was commissioned in the context of the Brighter Evenings Bill and concluded that it was not possible to come to final conclusions or to suggest that a move to CET would be more beneficial. It pointed to the fact that, as with the change of daylight over the year and different time arrangements, the data would indicate a move to less traffic accidents in either morning or evening conditions. But overall, one might end up with a similar number of accidents.

With regard to Road Safety, the Deputy Chief Medical Officer, Department of Health, references the *Impact of daylight saving time on road traffic collision risk: a systematic review*, the objective of which was to examine the impact of DST on collision risk, most recently in 2017⁴. The authors concluded that the evidence from the review cannot support or refute the assertion that a permanent shift in light from morning to evening will have a road safety benefit.

Health sector

At the request of the Steering Group, the Deputy Chief Medical Officer, Department of Health, considered the proposal. She referenced a number of studies in international literature which examine the relationship between Daylight Saving Time (DST) and health consequences. The studies include information on cardiovascular risk, mental health, vehicle and occupational accidents and life-style factors. The DCMO highlighted a research paper from Goodman et al⁵ relating to physical activity in children indicated that summer-time

⁴ Carey RN. & Sarma KM. (2017) Impact of daylight saving time on road traffic collision risk: a systematic review. *BMJ Open*, 7, e014319

⁵ Anna Goodman, Angie S Page, Ashley R Cooper, and others for the International Children's Accelerometry Database (ICAD) Collaborators

arrangements could generate positive effects linked to more outdoor leisure activities and this should not be ignored, in view of the high incidence of childhood obesity in Ireland. However, she pointed out that the evidence on overall health impacts (i.e. the balance of the assumed positive versus negative effects) remains inconclusive.

In respect of cardiovascular and mental health, the DCMO cites a number of research papers from Finland. These papers conclude that the one-hour time changes have no specific impact on mental health incidents while it has some impact on cardiovascular risk though it is difficult to isolate the time change impact from other risk factors.

Other submissions received cited research from the Society for Research on Biological Rhythms (US) and European Biological Rhythms Society that demonstrates that it is more important to have daylight earlier in the day to synchronise biological clocks and supporting winter/ standard time as the best option for public health. A range of research supporting other health benefits of winter over summer time was referenced.

Irish Nurses and Midwives Association (INMO)

In contrast, the INMO highlighted that 15% of Irish workers are shift workers, who are particularly impacted by time changes. Their preference is for summer time year round as it would assist those coming off night shifts by minimising light exposure.

Education sector

A number of respondents referenced the variations of time across the country if permanent summer time was chosen. They highlighted the impact for primary school-going children of darker mornings (sunrise after 9am) in winter and the variation across counties. It was noted that two schools in Wexford would have 75 such days, two schools in Belmullet would have 99 such days while 329 schools based in Dublin would have 80 dark mornings.

It should be noted that this outcome was recognised by other individual contributors who suggested changing school times to counter this impact.

Trade

ICTU was of the view that a harmonised system is critical as was retaining the achievement of the successive directives which created this harmonisation. They also pointed to the problematic nature of two different time zones within the island of Ireland. IBEC also expressed concern regarding the impact of differing time zones with our main trading partners.

Agriculture

There was a mixed response from the agricultural sector with views reflecting all the options: support; non-support; neutral and further study required. If changing, the preference was for summer time. Concerns were raised regarding the prospect of a different time zone in Northern Ireland given the interdependency. Similarly, the possibility of a patchwork of timezones throughout the EU was seen as having the potential to impede trade. The IFA suggested that a full comparative assessment of the current arrangements versus constant summer or winter on EU trade, road safety, public health, the environment and carbon emissions needs to be properly evaluated prior to such a fundamental change.

Energy

Both ESB and Gas Networks Ireland were neutral regarding discontinuing the clock change but expressed a preference for maintaining the same time as Northern Ireland due to the cross border network supply impact.

Others

A number of other submissions e.g. in the Sports & Recreation area, cited a preference to maintain the status quo or, if the proposal were adopted, the summer time option in order to maintain social activities in the evenings over summer and winter. Those making submissions also cited the benefits to children of greater access to sports activities after school, particularly in the context of the growing concerns regarding a trend to obesity in children.

Departmental positions

Department	Position
Agriculture, Food and the Marine	<p>Although the proposal itself may have merit, it is impossible to support it if the outcome could result in two different time-zones on the island of Ireland. Given the current uncertainties around Brexit the timing for considering such a change is not ideal. For that reason, the Department does not support the proposal at this time and recommends that its consideration be postponed until after Brexit negotiations are complete. Such a postponement will also allow Member States to better research the possible impacts and also enable the Commission to consider revising its proposal in order to address concerns around the possibility of a ‘patchwork’ of time zones throughout the EU and the resultant disruption to trade.</p>
Business, Enterprise and Innovation	<p>Taking account of stakeholder consultation, the Department of Business, Enterprise and Innovation does not currently see any particular advantages in eliminating seasonal clock changes. Given the continuing uncertainties around Brexit, the timing of deciding on such a change at this point is also not optimal. An outcome that could result in different time zones on the island of Ireland would be disadvantageous to the all island economy. It would present challenges for the movement of goods and people and cause 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. The Department considers that, at this point, Ireland should not support the proposal to change current arrangements</p>

<p>Communications, Climate Action & Environment</p>	<p>DCCAE agrees with the conclusions and recommendations contained in the report. Of particular note from DCCAE’s perspective is the preference expressed by both ESB and Gas Networks regarding maintaining the same time in Northern Ireland due to the cross border network supply impact, a view which we would fully support</p>
<p>Education and Skills</p>	<p>The adoption of GMT+1 year round would result in sunrise after 09:00 for very significant numbers of days across the whole country and particularly so in the western half of the country. In that event, a primary concern of this Department is the safety of pupils attending schools and specifically primary schools. In addition to the safety concerns, there are also concerns as to the potential costs arising in additional heating and lighting costs for schools arising from darker mornings – with associated climate impacts from the use of additional energy. There would also likely be capital implications for schools in terms of the provision of sufficient external lighting and other safety measures that would not currently be in place. In addition still, the hours of darkness have lower temperatures and therefore children would be travelling to school in lower temperatures with potential health related impacts likely to cause absence from school. The suggested mitigating option proposed in some commentary that school times could be varied to adapt to the darkness is not considered a reasonable or viable option given the implications for parents\guardians in terms of their work or travel patterns that would inevitably have to similarly be changed to “work around” the varied school times.</p> <p>It is noted that whilst we point to the safety, capital and energy consumption implications are referenced by ourselves; there does not</p>

	<p>appear to be significant research available pointing to the benefits of changing from the current status quo.</p> <p>Whilst the numbers involved in availing of education across the border (in both directions) are small measured against the total number of learners, the creation of apparent differences between the two sides of the border runs contrary to the effort in the education sphere in relation to Brexit i.e. in simple terms, keeping things the same rather than creating difference.</p> <p>For the reasons outlined above, this Department supports maintaining the current arrangements in relation to clock changes and would not at this time, based on available information, support any change to the current arrangements.</p>
Foreign Affairs & Trade	<p>DFAT has very serious concerns about this proposal. If it results in there being two time zones on the island of Ireland for part of the year there are serious concerns about the impact on cross border daily life and business and east-west impacts, should the UK position after their withdrawal be to maintain the biannual clock change. There are also concerns about how this would affect the smooth functioning of the Single Market, with an increased administrative burden, particularly in the transport sector.</p>
Health	<p>The Department of Health's position is that Ireland should not at this time support a proposal which could result in different time zones on the island of Ireland, which would negatively impact on the delivery of health services in the border region and cross-border arrangements as the United Kingdom has</p>

	<p>indicated that it intends to continue the practice of seasonal clock changes.</p> <p>Should the Directive be supported by a qualified majority, further research into the relationship between Daylight Saving Time (DST) and health in an Irish context will be required to inform a position on whether Ireland should opt for Summer or Winter time.</p>
Public Expenditure and Reform	<p>In view of the absence of significant evidence to support changing the status quo, the risk to market harmonisation across the EU and the concerns raised regarding the Northern Ireland/UK position, the recommendation is that Ireland should not at this time support a proposal which could result in different time zones on the island of Ireland.</p>
Rural and Community Development	<p>In view of the absence of consensus or significant evidence to support changing the status quo, the risk to market harmonisation across the EU and the concerns raised regarding the Northern Ireland/UK position, the recommendation is that Ireland should not at this time support a proposal which could result in different time zones on the island of Ireland but to revisit the matter once the UK's future relationship with the European Union has been agreed</p>
Transport, Tourism & Sport	<p>The most significant issues of concern for the Department of Transport, Tourism and Sport (DTTAS) are (a) the NI/UK position on the proposal, and (b) the impact on our tourism and transport sectors, in particular the aviation industry.</p> <p>A key concern for DTTAS is the potential for different time zones on the island of Ireland. If there is a scenario in which the UK does not discontinue seasonal changes of time, the time zone in Northern Ireland will be one hour ahead</p>

	<p>or behind that of Ireland for roughly half of the year. This would have practical and operational ramifications for the transport and tourism sectors.</p> <p>We note from the Road Safety Authority (RSA) report The potential impact of the implementation of the Brighter Evenings Bill on road safety in the Republic of Ireland (2015), which was shared with the European Commission as part of the RAS response to the public consultation, that it was not possible to conclude or to suggest that a move to CET would be more beneficial from a road safety perspective.</p> <p>With regard to aviation, any change from the status quo will lead to aviation schedule disruption, particularly the allowing of asynchronous time changes. It is crucial that necessary legislative measures are put in place to allow a transition, without breaching or undermining the objectives of Council Regulation (EEC) No 95/93 of 18 January 1993 on common rules for the allocation of slots at Community airports.</p> <p>We note too, the points raised by our stakeholders in the sports sector as part of the public consultation, cited a preference to maintain the status quo or, if the proposal were adopted, the summer time option in order to maintain sports activities in the evenings over summer and winter.</p> <p>The DTTAS position is that, in the absence of significant evidence to support changing the status quo, the risks and potential negative implications for our tourism and transport sectors, including the operation of cross-border rail, bus and road transport services and east-west aviation services, as well as the broader</p>
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	<p>concerns regarding the Northern Ireland/UK position on the proposal, outweigh any potential quantifiable benefits. We do not, at this time, support the proposal.</p>
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Section 4 – Analysis of the merits of the proposal

In launching its consultation, the EU Commission referenced five particular themes for consideration

THEME	POSITION	RESEARCH REFERENCED	IRISH CONSULTATION
Internal market	Evidence is only conclusive on one point: that allowing uncoordinated time changes between Member States would be detrimental to the internal market due to higher costs to cross-border trade, inconveniences in transport, communications and travel, and lower productivity in the internal market for goods and services.	EPRS study acknowledges that the current arrangement benefits the internal market, leisure activities and generates marginal energy savings;	<p>As outlined in Section 1, the practice of seasonal clock changes has been in place since 1916 with varying arrangements around Europe. The need for harmonisation was recognised by the EU. The European Parliamentary Research Services report highlights the fact that it took four years to reach agreement on the first EC Summer time directive in 1980. However, it took a total of nine directives, adopted over a time span of 20 years, to put a uniform and open-ended EU-wide system in place. The current directive (2000/84/EC), adopted on 19 January 2001, extended the provisions indefinitely, drawing on the argument that the functioning of the internal market required 'stable, long-term planning'.</p> <p>If current legislation is revoked, combined with 18 month lead time to change time zones, MS won't be able to continue with seasonal clock changes. At best, harmony would be achieved via coordinating chosen time zones with neighbours and will have</p>

THEME	POSITION	RESEARCH REFERENCED	IRISH CONSULTATION
			certainty and a notification window for changes to the time zones in other MS. The criticality of a harmonised system was emphasised in the responses from the trade sector.
Energy	Despite having been one of the main drivers of the current arrangements, research indicates that the overall energy savings effect of summertime is marginal. Results also tend to vary depending on factors such as geographical location.		A preference was expressed by both ESB and Gas Networks Ireland for maintaining the same time as Northern Ireland to facilitate the smooth operations of the cross border network supply.
Health	Summertime arrangements are estimated to generate positive effects linked to more outdoor leisure activities. On the other hand, chronobiologic research findings suggest that the effect on the human biorhythm may be more severe than previously thought. The evidence on	EPRS report which also references TAB (Bundestag). TAB report concludes that the available scientific evidence base and state of knowledge with regard to possible implications of DST is still very limited and rather fragmentary. Nevertheless, it does not reveal any indications that the application of DST would induce serious positive or negative implications for energy consumption, economy or health. In this respect,	As outlined in Section 3, based on the submissions received, there is no conclusive evidence of impact on health. The observations from the DCMO also reference the lack of conclusive evidence around road safety. A number of responses highlighted the benefits of permanent winter time on human biorhythms while the INMO highlights that summer time year round would be of more benefit to shift workers.

THEME	POSITION	RESEARCH REFERENCED	IRISH CONSULTATION
	<p>overall health impacts (i.e. the balance of the assumed positive versus negative effects) remains inconclusive.</p>	<p>the question whether the current DST arrangements will be maintained, amended or abandoned will continue to be – for the foreseeable future – the subject of political and public debates which can rely on scientific facts only to a very limited extent.</p>	
<p>Road Safety</p>	<p>Evidence remains inconclusive with regard to the relationship between summertime arrangements and road traffic accidents. In principle, sleep deprivation from advancing the clock in spring could increase the risk of accidents. At the same time, extended daylight hours during summer evenings are considered to have a positive effect on road safety. However, it is generally difficult to attribute directly the effect of summertime arrangements on accident rates compared to other factors.</p>	<p>The Royal Society for the Prevention of Accidents (UK) supports a move to what it refers to as Single Double Summer time – essentially keeping the seasonal clock change but moving to CET time zone.</p>	<p>The RSA report of 2015 and 2017 review referenced by the DCMO both point to a lack of conclusive evidence that moving to year round summer time or CET would impact road safety.</p> <p>Stakeholders highlighted the impact of darker mornings in terms of road safety for school children if permanent summer time was chosen.</p>

THEME	POSITION	RESEARCH REFERENCED	IRISH CONSULTATION
Agriculture	Previous concerns regarding disrupted biorhythm of animals and changing milking schedules due to the time switch appear to have largely disappeared due to the deployment of new equipment, artificial lighting and automated technologies. An extra daylight-hour during summer can also be an advantage allowing extended working hours for outdoor activities, such as working in fields and harvesting.	The available scientific evidence on the impact of DST on various other sectors (e.g. agriculture and safety) remains inconclusive;	Section 3 outlines the response from the agricultural sector which reflected all the options - Similarly, the possibility of a patchwork of time zones throughout the EU was seen as having the potential to impede trade. Concerns were raised regarding the prospect of a different time zone in Northern Ireland given the interdependency. The IFA suggested that a full comparative assessment of the current arrangements versus constant summer or winter needs to be properly evaluated prior to such a fundamental change.
Other themes raised via Irish consultation			
Northern Ireland/UK position			For Ireland, the prospect of differing time zones on the island of Ireland is particularly unpalatable. From the Amárach poll output, 82% of respondents would not favour any measure that resulted in different time zones between Ireland and

THEME	POSITION	RESEARCH REFERENCED	IRISH CONSULTATION
			<p>Northern Ireland. 39% of the stakeholder submissions raised concerns around trade, utility costs and transport schedules. These concerns also extended to trade with the UK.</p> <p>This concern would be exacerbated by the fact that the UK is due to leave the EU and after that, and the expected transition period, will not be bound by any new measure adopted. If the UK continues to change clocks twice yearly, while Ireland ceases the practice, there could be a period of up to seven months during which there would be two time zones on the island of Ireland.</p>
Transport		<p>In a 2014 review commissioned by the Directorate General for Mobility and Transport (DG-MOVE) on Summertime application in Europe⁶ cross border transport and scheduling is identified as one of the areas which has benefitted most directly from EU</p>	<p>This is supported by the views of the stakeholders from the airline industry in particular who point to the significant impact for the aviation industry and their consumers. Their preference is to remain with the current arrangements. They point to the requirement for a long lead time to</p>

⁶ The Application of Summer time in Europe, ICF International, September 2014

THEME	POSITION	RESEARCH REFERENCED	IRISH CONSULTATION
		<p>wide time harmonisation as prior to that there were a number of costs incurred around schedule changes. It focussed on the harmonisation or likely impacts of a non-harmonised system.</p>	<p>allow for synchronisation at both European and global level.</p>
<p>General requirement for a more detailed assessment.</p>			<p>As outlined in section 3 based on the various submissions received, there is no unanimous agreement on the benefits of the seasonal clock changes and or their discontinuance. A number of respondents would like to see more detailed analysis of the proposal and/or the output from other Member States' consultation processes before forming a view as to their position.</p> <p>This is equally reflected in the Member States' feedback.</p>

Section 5 - Conclusions and Recommendation,

Based on the available evidence and the feedback from those who provided comments via the public consultation, the conclusions in respect of this proposal are as follows:

1. There is no clear conclusive evidence available at this point to suggest that changing the current arrangements would be beneficial.
 2. There is a risk to the market harmonisation if there is not a large degree of coordination across EU Member States regarding their chosen time zones and this already exists in the current arrangements.
 3. The impact on Northern Ireland is particularly complex given the UK withdrawal from the EU and the fact that the UK will not be bound by whatever EU legislation is adopted arising from this proposal. The UK has opposed the proposal from the outset.
 4. The potential for different time zones arising between Britain and Ireland and North/South post Brexit and the political implications of that in addition to the impact on cross-border trade, utilities, transport and daily life would be matters of major concern for Ireland.
 5. While substantial in terms of a response, the public consultations both at EU and national level do not represent a citizens' vote or a representative sample. The responses are self-selected. The responses to the EU Consultation represented 0.9% of the EU population, but only 0.24% of the Irish population, and were skewed by the high number of responses from one large member state. For the national consultation, participation increased to 0.34% of national population. The separate Opinion Poll which was commissioned by the Department of Justice and Equality used a sample of 1000 which is reflective of the national population demographic.
 6. Of those who commented on the proposal in the consultation, the majority would favour discontinuing the current practice of twice-yearly clock changes. This is also reflected in the findings of the opinion poll but significantly, 82% of those polled were not in favour of any arrangements that would result in a different time zone between Ireland and Northern Ireland.
 7. If the proposal were approved, the majority of respondents would favour year long summer time retaining the brighter evenings in summer. The opinion poll similarly found majority support for staying on summer time.
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Recommendation

In view of the absence of significant evidence to support changing the status quo, the risk to market harmonisation, increased administrative burden across the EU and the concerns raised regarding the Northern Ireland/UK position, the recommendation is that Ireland should not at this time support a proposal which could result in different time zones on the island of Ireland, and which does not contribute positively to the functioning of the Single Market.

Appendices

**Inter-Departmental Steering Group on the
Proposal for a Directive of the European Parliament and of the Council
Discontinuing Seasonal Changes of Time and Repealing Directive 2000/84/EC**

Background

This Inter-Departmental Steering Group was convened by the Department of Justice and Equality to consider the EU Commission proposal to end clock changes in Member State with effect from 1 April 2019.

Membership and logistics

- The Department of Justice and Equality will chair and provide Secretariat to the Group
- The following Departments will be members of the Group: Agriculture Food and Marine; Business, Enterprise and Innovation; Communication Climate Action and Environment; Education and Skills; Foreign Affairs and Trade, Health, Public Expenditure and Reform, Rural and Community Development; Taoiseach, Transport, Tourism and Sport.

Purpose

The purpose of the Steering Group is to:

- Consider the EU Commission Proposal
- Input into briefing for discussions at Working Group and Ministerial level
- Have oversight of a public consultation exercise with all relevant stakeholders
- Develop conclusions and recommendations for a report to Government

Role of members

- Attendance at Steering Group meetings
- Identify relevant stakeholder in their sector
- Provide details of any specific sectoral analysis available
- Participate in focussed sectoral engagements

Departmental representatives on the Inter-Departmental Steering Group

Department	Representative
Justice and Equality	Doncha O’Sullivan Eileen Leahy Aisling Brennan Eoghan O’Brien Darragh Brennan
Agriculture, Food and the Marine	Padraig McMahon Catherine Healy
Business, Enterprise and Innovation	Michael O’Leary
Communications, Climate Action and Environment	Brendan O’Reilly
Education and Skills	Neville Kenny
Foreign Affairs and Trade	Ciara Delaney Ruth Parkin
Health	Judith Szlovak replaced by Kevin Bulman
Public Expenditure and Reform	Brendan Ellison
Rural and Community Development	Clodagh McDonnell
Taoiseach	Brenda Boylan
Transport, Tourism and Sport	Claire Martinez replaced by Siobhan NicThighearnáin



TEXTS ADOPTED

P8_TA(2018)0043

Time change arrangements

European Parliament resolution of 8 February 2018 on time change arrangements (2017/2968(RSP))

The European Parliament,

- having regard to Article 114 of the Treaty on the Functioning of the European Union,
 - having regard to Directive 2000/84/EC of the European Parliament and of the Council of 19 January 2001 on summer-time arrangements⁷,
 - having regard to the Interinstitutional Agreement between the European Parliament, the Council of the European Union and the European Commission of 13 April 2016 on better law-making⁸,
 - having regard to Rule 123(2) of its Rules of Procedure,
- A. whereas according to the Interinstitutional Agreement on better law-making, the evaluation of existing legislation should provide a basis for impact assessments as regards options for future action;
- B. whereas numerous scientific studies, including the European Parliamentary Research Service study of October 2017 on EU summer-time arrangements under Directive 2000/84/EC, have failed to come to a conclusive outcome, but have instead indicated the existence of negative effects on human health;
- C. whereas a number of citizens' initiatives have highlighted citizens' concerns about the biannual clock change;

⁷ OJ L 31, 2.2.2001, p. 21.

⁸ OJ L 123, 12.5.2016, p. 1.

- D. whereas Parliament has raised this issue before, for example in Oral Question O-000111/2015 – B8-0768/2015 to the Commission of 25 September 2015;
- E. whereas it is crucial to maintain a unified EU time regime even after the end of biannual time changes;
 - 1. Calls on the Commission to conduct a thorough assessment of Directive 2000/84/EC and, if necessary, come up with a proposal for its revision;
 - 2. Instructs its President to forward this resolution to the Commission, the Council, and the governments and parliaments of the Member States.

Stakeholder submissions received

The time consultation mail in database received 789 emails in total. The breakdown is as follows.

Email category	Nature of category	Number of emails	Analysis
RESPONSES ANALYSED			
Consultation	Responses from organisations	75	60 responses from organisations of which 4 were Govt Departments/public sector, 15 emails were multiple emails.
Submissions	Substantive responses from individuals	117	117 responses, 3 multiples
RESPONSES EXCLUDED			
Responses	Responses where an individual has only answered one or more of the survey questions	494	Not included as cannot verify that they have not separately answered the survey
Other queries	Emails suggesting clarification required	18	Noted – addressed in information for Amárach questions
Auto responses	Out of office etc	80	Disregarded
Spam		5	These were spam notification emails, due to the nature of these emails release was not requested
		789	

	Name	Change? Yes/No	Summer/Winter time	Northern Ireland	Comment
1	1 of the Blind Legal Alliance	Yes	Winter time	No Opinion	Outlines advantages of winter time in terms of Road Safety, schools and Britain
2	Aer Lingus	No	Summer time	No Opinion	Lead in time Important. Has implications in terms of revising schedules, international connectivity and operational restrictions
3	Agricultural Science Association	Yes	Summer time	Preference for same time	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.
4	Ballinacor Camogie Club	Unclear	Summer time	No Opinion	Outdoor training on summer evenings would be impacted by constant winter time
5	Bord Iascaigh Mhara	No Opinion	No Opinion	No Opinion	Unaffected by this change
6	Central Bank of Ireland	Neutral	Summer time	Not seen as an issue	More daylight might encourage people to go for a walk or exercise in line with healthy living objectives, NI issue - not Ideal But acceptable
7	Church of Ireland Board of Education	Yes	Summer time	Preference for same time	brighter evenings will allow children to have more outdoor activity
8	Cllr Ryan	Yes	Summer time	Not seen as an issue	Discussed the issue with constituents and they indicated that they wish to keep summertime even if it means NI is on different time
9	Commission for Aviation Regulation	No	No Opinion	No Opinion	will need significant time for transition plans, questions why the change is being proposed, given the lack of evidence regarding the benefits
10	Commissioners of Irish Lights Navigation & Maritime Services	Yes	Summer time	Preference for same time	NI issue - Would have highly negative operational impact
11	Committee of the Irish Mountain Running Ass	Unclear	Summer time	No Opinion	Wants Summer time in the Summer

	Name	Change? Yes/No	Summer/Winter time	Northern Ireland	Comment
12	Council for the Curriculum, Examinations and Assessment	No Opinion	No Opinion	Preference for same time	Would impact Candidates in Republic taking GCSE and GCE/A Level examinations
13	Department of Sociology, University of Limerick	No	No Opinion	No Opinion	DST has advantages that outweigh the inconvenience
14	Dublin Institute of Technology	No Opinion	No Opinion	No Opinion	Responded to consultation on line
15	EBTI	Neutral	Neutral	No Opinion	Satisfied with either option
16	ESB	Neutral	Neutral	Preference for same time	Synchronise clocks between all
17	European Movement Ireland	No Opinion	No Opinion	Preference for same time	Waiting for result of Public Consultation
18	Foras na Gaeilge	No Opinion	No Opinion	Preference for same time	
19	Galway & Roscommon Education and Training Board	No Opinion	No Opinion	No Opinion	Noted GRETB did not wish to make a submission
20	Gas Networks Ireland	No Opinion	No Opinion	Preference for same time	Implications for Gas pipe network as their network enters NI and GB
21	Griffith College	No	No Opinion	No Opinion	Registers support to retain seasonal clock changes on safety grounds
22	Horse Racing Ireland	No	No Opinion	No Opinion	Keep the bi annual clock changes. Horse are generally trained and conditioned at first light, and race meetings take advantage of light at the other end of the day with the last race finishing well before sunset.
23	Housing Agency	Yes	Summer time	Preference for same time	Different time zones would impact upon construction firms and their workers who commute across the border on a daily basis.
24	IBEC	No	No Opinion	Preference for same time	Ireland's position in the GMT is an advantage in the provision of global business service. Due to uncertainty of how changes in other country 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.

	Name	Change? Yes/No	Summer/Winter time	Northern Ireland	Comment
25	ICMSA	Yes	Summer time	Preference for same time	Wish to maintain same time zone on the island of Ireland.
26	Incoming Tour Operators Association Ireland	Yes	Summer time	Preference for same time	Enable visitors in winter to have a better holiday experience with more time in daylight in the afternoon making for easier access nationally.
27	Irish Auditing & Accounting Supervisory Authority	No	No Opinion	No Opinion	While not impacting on their core work, staff often travel to the UK as part of their EU obligations
28	Irish Aviation Authority's	No Opinion	No Opinion	No Opinion	requires enough lead in time
29	Irish Congress of Trade Unions	No Opinion	summer time		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. It would be wholly problematic for two time zones to exist on the island.
30	Irish Farmers' Association	Further information required before a position can be taken	N/A	Preference for same time	Any kind of change to the current system would cause more disruption than it is worth. 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. 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.
31	Irish Nurses and Midwives Organisation	Yes	Summertime	Not seen as an issue	There could be advantages in a different time in relation to the timing of peak energy demand
32	Irish Patients Association	No	Wintertime	No Opinion	Unclear, but it appears they want the status quo. Safety benefits associated with wintertime in the winter.
33	Irish Primary Principals' Network	Yes (based on survey of network members)	Summertime	Not seen as an issue	Gives a detailed breakdown of a survey conducted with their members.

	Name	Change? Yes/No	Summer/Winter time	Northern Ireland	Comment
34	Irish Rural Link	Yes	Summertime	No Opinion	A move to Summer time would reduce loneliness, improve mental health, reduce crime, lead to improvements for agriculture and energy saving
35	Irish Water Safety	Yes	Summertime	No Opinion	No further commentary provided.
36	Maynooth University, Hamilton Institute, Department of Mathematics and Statistics,	No	status quo	would be undesirable	DST is a reasonable compromise across Europe. Benefits for Southern and Northern Europe and operationally, has resulted in smooth cross border operation. Not fully clear if stopping the twice yearly change will be an improvement until we know what our European neighbours and the UK will do. Wintertime would be the correct choice for citizens and business dealing with the US. Timescale is an issues, also outlines issues removing DST from computer systems
37	Meath Later life Network	Yes	Summertime	No Opinion	opportunity for more outdoor walking and encourage interaction between neighbours
38	Medical Bureau of Road Safety	Yes	Summertime	No Opinion	Summertime would provide more time for outdoor activities
39	National Parents Council Primary.	Yes	Summertime	Not seen as an issue	Undertook their own survey with parents. Response is based on their results. Undertook their own survey and have provided a breakdown of results
40	Newry Chamber of Commerce & Trade	No Opinion	No Opinion	Preference for same time	Against implementation of any policies which would lead to a greater divergence between the North and South of Ireland. Points out the disruptive impact a different time in NI would have on business and community life.
41	Newry, Mourne and Down District Council's	No Opinion	No Opinion	Preference for same time	Different time zones between Ireland and NI has potential to have both a direct and indirect adverse equality of opportunity impact upon the daily life of individuals who reside in one jurisdiction and avail of public sector services / work in the other.

	Name	Change? Yes/No	Summer/Winter time	Northern Ireland	Comment
42	NORTHERN IRELAND CHAMBER OF COMMERCE AND INDUSTRY	No Opinion	No Opinion	Preference for same time	Of the view that the proposal needs further consideration.
43	Port of Galway	No Opinion	No Opinion	No Opinion	No impact on operation of port.
44	Royal College of Surgeons in Ireland	Yes	Wintertime	No Opinion	positive health benefits highlighted
45	RTE Transmission Network	Yes	Neutral	No Opinion	Current arrangements are a risk to the stability of broadcast systems stopping changes would remove a potential IT issue
46	Seán Kelly MEP	Yes	Neutral	No Opinion	disruption caused by the clock change has a detrimental impact on human health
47	State Examinations Commission	No Opinion	No Opinion	No Opinion	No further comment provided.
48	Teachers' Union of Ireland	Yes	Neutral	Preference for same time	Outlines impact on students resident along the border and participating in work experience placements
49	TG4	No Opinion	No Opinion	No Opinion	No further comment provided
50	Tommy Broughan T.D.	Yes	Summertime	No Opinion	Health benefits, more time for outdoor activities, darkest winter mornings could be offset by schools opening later.
51	Tourism Ireland	Yes	Summertime	Preference for same time	A move to summer time would help underpin Tourism Ireland's strategic objectives, In favour of a shift to constant 'summertime' across the EU, subject to this approach being taken by UK
52	Trinity College Institute of Neuroscience	No	No Opinion	No Opinion	Is opposed to the proposal.
53	UCD SAC	Unclear	summer time	No Opinion	change to winter time would effectively eliminate all midweek activities
54	University College Cork	No	No Opinion	Would want NI on same time	Wishes to retain the current arrangements

	Name	Change? Yes/No	Summer/Winter time	Northern Ireland	Comment
55	University of Limerick - Office of the President	No Opinion	No Opinion	No Opinion	No further comment provided
56	Western Development Commission	No	Wintertime	Preference for same time	Concerned that early morning travel and activities in the winter time could be more difficult, however, conscious that if Europe stay on summertime and we are on wintertime there would be a 2 hr time difference which could have some impact on business activity and social interaction

	Name	Change? Yes/No	Summer/Winter time	Northern Ireland	Other
1		yes	Summer time	Not seen as an issue	Wants Summertime on Health grounds and also wants Ireland on the same time as Central Europe
2		Neither	Neither	No Opinion	Winter time should be shorter
3		No	No opinion	No Opinion	Move to summer time would increase accidents
4		Neither	Neither	Preference for same time	Shorten the period of winter time
5		Yes	Summer time	No Opinion	Summertime would bring energy savings. If clock changes remain then we should shorten the period of winter time
6		Unclear	Unclear	No Opinion	Appears to want the status quo based on business communications
7		No Opinion	No opinion	No Opinion	Concern about clocks that are automatically adjusted
8		Yes	Summer time	Not seen as an issue	There has been a general shift to later start times for work and school and summer time would suit this
9		Yes	Summer time	Not seen as an issue	We should align ourselves with the EU not the UK
10		Yes	No opinion	No Opinion	The clock changes should stop but no opinion expressed on summer or winter
11		Yes	Summer time	No Opinion	Summertime would increase the well-being of the nation
12		Yes	Winter time	Not seen as an issue	Benefits the political and business areas due to making time conversions easier
13		No	No opinion	No Opinion	concern over the cost of the EU proposal, calls for a referendum

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	Name	Change? Yes/No	Summer/Winter time	Northern Ireland	Other
14		Yes	Winter time	Not seen as an issue	UK will also change to winter in order to preserve the Prime Meridian running through Greenwich
15		Yes	Winter time	Not seen as an issue	Dark mornings would be a safety concern
16		No	No opinion	No Opinion	Dark mornings would be a safety concern and also impact mental health
17		Unclear	No opinion	No Opinion	There should be one time zone for the EU
18		Neither	Neither	No Opinion	GMT+1/2 would give more reasonable sunrise and sunset times
19		No	No opinion	Preference for same time	two time zones in Ireland would be against the Good Friday Agreement, dark mornings dangerous for schoolchildren
20		No	No opinion	No Opinion	Points out issues with staying on the same time all year, energy and safety
21		No	Winter time	No Opinion	Wants status quo but sees winter time as the better of the two options
22		Neither	No opinion	No Opinion	Summer time should be extended
23		No	No opinion	No Opinion	Safety and well being of children a concern
24		Unclear	Unclear	No Opinion	Wants to retain long summer evenings
25		No	No opinion	No Opinion	Safety implications of winter time and increased energy consumption for outdoor lighting in schools
26		Yes	Unclear	No Opinion	Wants clock changes to stop, does not indicate which time she would like to remain on
27		No	Unclear	No Opinion	wants noon to remain the time that the sun is at the highest point in the sky
28		Unclear	Unclear	Preference for same time	no point in creating a Hard time Border
29		No Opinion	Unclear	No Opinion	Feels information provided was convoluted

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	Name	Change? Yes/No	Summer/Winter time	Northern Ireland	Other
30		No	No opinion	No Opinion	Winter time should be shorter
31		Unclear	Unclear	No Opinion	Time should be in line with continental Europe
32		Yes	Summer time	No Opinion	More outdoor exercise time for children after school and more productivity in the evening for people who work outdoors
33		Yes	Summer time	No Opinion	If no move to summer time then winter time should be made shorter
34		Neither	No opinion	No Opinion	Winter time should be shorter
35		Unclear	Summer time in the summer	No Opinion	Sport is played in the evenings in the summer
36		Yes	Summer time	No Opinion	schools and many workplaces are closed at the peak of mid winter which would lessen the worst of the effect of perm summer time
37		No	No opinion	No Opinion	Children will have to go to school in the dark
38		Yes	Summer time	No Opinion	Summer evenings are an attraction for tourists. Children already go to school in the dark so not much impact
39		Yes	Summer time	No Opinion	We should keep changes and shorten winter time
40		Yes	Summer time	No Opinion	GMT+1 is the correct time zone based on longitude 8.14 west for the centre of the country
41		Yes	Summer time	No Opinion	The argument for children's safety is gone as they don't walk to school anymore
42		No	No opinion	No Opinion	"one fits all" for countries in EU does not make sense
43		No	No opinion	Preference for same time	changing to one time would impact mental health

	Name	Change? Yes/No	Summer/Winter time	Northern Ireland	Other
44		Yes	Summer time	No Opinion	Moving to summer time would reduce mental health issues
45		Yes	Summer time	Not seen as an issue	Summer time would give an extra hour for children to play outside
46		Yes	Summer time	No Opinion	Light in the evenings would be more useful
47		No	No opinion	Preference for same time	this is a safety issue
48		No Opinion	Unclear	No Opinion	Points out that the sunrises at different times in differently
49		Yes	Summer time	No Opinion	Most people are up when it's dark anyway. Would benefit from extra hour light in evening
50		No	No opinion	Preference for same time	brighter mornings are needed for young people going to school or college
51		Yes	Winter time	No Opinion	Winter is closer to natural solar time
52		No	No opinion	No Opinion	concern about accidents, feels there should be a trial period
53		No	No opinion	No Opinion	Removing changes would impact business and schools
54		No Opinion	Unclear	No Opinion	wants more light
55		Yes	Summer time	Not seen as an issue	More available light for physical activity
56		Unclear	Summer time in the summer	No Opinion	Keep summer time in summer for outdoor activities
57		Neither	neither	No Opinion	Fix at GMT+half
58		No	No opinion	Not seen as an issue	Safety issue for children and elderly
59		No	No opinion	No Opinion	Safety issue for children
60		Yes	Summer time	No Opinion	health issue
61		No	No opinion	No Opinion	Would benefit some businesses
62		Yes	Summer time	Not seen as an issue	Would benefit the economy

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	Name	Change? Yes/No	Summer/Winter time	Northern Ireland	Other
63		Yes	Summer time	No Opinion	Company opening times should be staggered from 6am to 10 am to ease pressure on public transport and traffic
64		Unclear	Unclear	No Opinion	ran her own poll giving 88.37% for summer and 11.24% for winter of 258 people
65		Neither	neither	No Opinion	Shorten the period of winter time
66		No	No opinion	No Opinion	gives the best light to suit needs
67		Yes	Winter time	Not seen as an issue	light needed for going to school or work
68		Yes	Winter time	Not seen as an issue	noon should be the middle of the day, summer time would give icy roads in the wintertime
69		Yes	Summer time	Not seen as an issue	Would give more time for outdoor activities
70		Yes	Summer time	Preference for same time	the move to summer time would reduce burglaries
71		Yes	Winter time	No Opinion	Winter time should be shorter
72		No Opinion	No opinion	Preference for same time	we should wait and do whatever the UK do
73		No	Winter time	No Opinion	already to many changes for shift workers and on call staff
74		Neither	neither	No Opinion	Shorten the period of winter time
75		No	No opinion	No Opinion	Shorten the period of winter time
76		No	No opinion	No Opinion	Safety issue
77		Yes	Summer time	No Opinion	would resolve an IT issue
78		No	No opinion	No Opinion	Safety
79		Yes	summer time	No Opinion	making most of available light
80		Unclear	Summer time in the summer	No Opinion	more time for outdoor activity
81		Unclear	neither	No Opinion	Against summer all the time, Safety issue, school children

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	Name	Change? Yes/No	Summer/Winter time	Northern Ireland	Other
82		Yes	Summer time	Not seen as an issue	adopting this EU proposal will further underline our commitment
83		No	No opinion	No Opinion	Shorten the period of winter time
84		Unclear	Unclear	No Opinion	wants more light
85		Unclear	Summer time in the summer	No Opinion	A keen participant in outdoor activities
86		Unclear	Summer time in the summer	No Opinion	A keen participant in outdoor activities
87		Unclear	Summer time in the summer	No Opinion	A keen participant in outdoor activities
88		Unclear	Summer time in the summer	No Opinion	A keen participant in outdoor activities
89		Unclear	Summer time in the summer	No Opinion	A keen participant in outdoor activities
90		Unclear	Summer time in the summer	No Opinion	A keen participant in outdoor activities
91		Unclear	Summer time in the summer	No Opinion	A keen participant in outdoor activities
92		Unclear	Summer time in the summer	No Opinion	A keen participant in outdoor activities
93		Unclear	Summer time in the summer	No Opinion	A keen participant in outdoor activities
94		Unclear	Summer time in the summer	No Opinion	A keen participant in outdoor activities
95		Unclear	Summer time in the summer	No Opinion	A keen participant in outdoor activities
96		Unclear	Summer time in the summer	No Opinion	A keen participant in outdoor activities
97		Unclear	Summer time in the summer	No Opinion	A keen participant in outdoor activities

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	Name	Change? Yes/No	Summer/Winter time	Northern Ireland	Other
98		Unclear	Summer time in the summer	No Opinion	A keen participant in outdoor activities
99		Unclear	Summer time in the summer	No Opinion	A keen participant in outdoor activities
100		Unclear	Summer time in the summer	No Opinion	A keen participant in outdoor activities
101		Unclear	Summer time in the summer	No Opinion	A keen participant in outdoor activities
102		Unclear	Summer time in the summer	No Opinion	A keen participant in outdoor activities
103		Unclear	Summer time in the summer	No Opinion	A keen participant in outdoor activities
104		Unclear	Summer time in the summer	No Opinion	A keen participant in outdoor activities
105		Unclear	Summer time in the summer	No Opinion	A keen participant in outdoor activities
106		Unclear	Summer time in the summer	No Opinion	A keen participant in outdoor activities
107		Unclear	Summer time in the summer	No Opinion	A keen participant in outdoor activities
108		Unclear	Summer time in the summer	No Opinion	A keen participant in outdoor activities
109		Unclear	Summer time in the summer	No Opinion	A keen participant in outdoor activities
110		Unclear	Summer time in the summer	No Opinion	A keen participant in outdoor activities
111		Unclear	Summer time in the summer	No Opinion	A keen participant in outdoor activities
112		Unclear	Summer time in the summer	No Opinion	A keen participant in outdoor activities

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	Name	Change? Yes/No	Summer/Winter time	Northern Ireland	Other
113		Unclear	Summer time in the summer	No Opinion	A keen participant in outdoor activities
114		Unclear	Summer time in the summer	No Opinion	A keen participant in outdoor activities

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