



# IFA

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

### Introduction

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### **Other issues**

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

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

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

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

### **Conclusions**

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

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

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

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