



accidents don't have to happen

# Discontinuing Seasonal Changes of Time

RoSPA's Response to House of Lords EU Internal Market Sub-Committee

Date: August 2019



Response to House of Lords EU Internal Market Sub-Committee, Discontinuing Seasonal Changes of Time

## Introduction

This is the response of The Royal Society for the Prevention of Accidents (RoSPA) to the House of Lords EU Internal Market Sub-Committee's call for evidence on discontinuing seasonal changes of time. It has been produced following consultation with RoSPA's National Road Safety Committee.

EU summertime legislation requires Member States to begin summertime arrangements on the last Sunday of March and end them on the last Sunday of October. On 13 September 2018, the European Commission published a proposal to replace the obligation to apply seasonal changes of time with an obligation to discontinue this practice and observe winter- or summer-time throughout the year. The choice of permanent winter- or summer-time will be at the discretion of each Member State.

If the Directive is adopted and it has a transposition deadline that falls within the period in which the UK is still a Member State or in a transition period, the UK will be required to end seasonal changes of time and choose between applying permanent winter- or summer-time.

However, if the Directive is adopted and it has a transposition deadline day after exit day, and the UK has no obligation to continue applying EU law, the UK will be faced with the choice of maintaining seasonal changes or time or abolishing them in line with its EU neighbours.

The proposal has significant implications for Ireland: while time is a reserved matter in respect of Scotland and Wales, there is no equivalent reservation or exception for Northern Ireland. Northern Ireland may therefore need to choose between aligning its time arrangements with the Republic of Ireland or with the rest of the UK.

The House of Lords Internal Market Sub-Committee has launched an inquiry into the European Commission's proposal to end seasonal changes of time in the EU, and what this proposal will mean for the UK in the context of Brexit. It will examine what preparations the Government should make for the possibility that the Directive is adopted and what factors should inform its approach.



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*If the proposal is adopted, but the UK is not required to comply...*

### Question 1

**What would the implications of UK retaining seasonal changes of time while the EU did not? Would any sectors be particularly affected?**

### RoSPA Response

Currently, there are three standard time zones within the EU: Western European or Greenwich Mean Time (GMT), covering the UK, Ireland and Portugal, Central European Time (GMT+1) covering 17 Member States and Eastern European Time (GMT+2) covering eight Member States. These time zones are varied by seasonal or summer-time changes, when clocks move forward one hour in the spring to make better use of natural daylight. Should the proposal be adopted, but the UK is not required and chooses not to comply, the time zone differences between the UK and EU member states may become wider, affecting cross-border activity.

We continue to urge that the UK adopts the changes should the Directive be approved. This is because due to the current UK system, more people are killed and injured on the road because of darker evenings in autumn and winter than would be if we adopted British Summer-time all year round. In 2017, the number of pedestrian deaths rose from 37 in September to 46 in October, 63 in November, and 50 in December. The casualty rate for all road users increased from 520 per billion vehicle miles in October to 580 per billion vehicle miles in November.

It would also bring significant environmental, economic and health benefits, the latter being particularly relevant to public health concerns about obesity. Dependent on the choice of other Member States, the UK may become aligned with the Central European Time Zone, which could bring additional business benefits.

RoSPA are not in a position to comment on whether harmonised EU rules are required are necessary for the functioning of the EU's internal market or whether uncoordinated time changes would be detrimental on particular sectors of the economy.

### Question 2

**What measures could be adopted to mitigate any disadvantages of non-alignment?**

### RoSPA Response

RoSPA is not in a position to comment.



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### Question 3

**What lessons can be learned from countries or states that maintain different seasonal clock change arrangements to their neighbours?**

#### RoSPA Response

In countries such as Russia and the US, there are different time zones within the country. However, RoSPA is not in a position to comment further.

### Question 4

**What would the implications of a time border on the island of Ireland, or between Northern Ireland and Great Britain?**

#### RoSPA Response

If there were different time zones in Northern Ireland and Republic of Ireland, this would inevitably be detrimental for cross border communities, especially those living and working across the border. It is difficult to predict what the road safety implications of this might be. However, we do know that driver fatigue causes road crashes. Different time zones across the border may exacerbate the problem for cross border communities and those driving early and late in the day.

*If the proposal is adopted, and the UK is required or chooses to comply...*

### Question 5

**How should the Government approach the choice between permanent winter- and summer-time?**

#### RoSPA Response

As the UK's leading safety charity, RoSPA urge the Government to consider safety when making a choice between permanent winter- and summer-time. Road accident statistics show that it would be beneficial to adopt British summer-time all year round. During the working week, casualty rates peak between 8am and 10am and 3pm and 7pm with the afternoon peak being higher for both. Road casualty rates increase with the arrival of darker evenings and worsening weather conditions. Every autumn when the clocks go back and sunset occurs earlier in the day, road casualties rise. The effects are worse for the most vulnerable road users like children, the elderly, cyclists and motorcyclists.

Since 1960, RoSPA have been campaigning for lighter evenings. In 1968, there was a three-year experiment when BST was employed all year round. The clocks were advanced in March 1968 and were not put back until October



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1971. Although this is now several decades ago, this period provided an opportunity to evaluate the effect of discontinuing clock changes on road traffic casualties.

Road casualty figures during the morning (7-10am) and afternoon (4-7pm) for the period affected by time change in the two winters before the experiment (1966/67 and 1967/68) and in the first two winters when BST was retained (1968/69 and 1969/70) were analysed. The data showed that keeping British Summer-time had resulted in an 11 per cent reduction in casualties during the hours affected by the time change in England and Wales, and a 17 per cent reduction in Scotland. The overall reduction for Great Britain was 11.7 per cent. Although casualties in the morning had increased, the decrease in casualties in the evening far outweighed this.

Overall, about 2,500 fewer people were killed and seriously injured during the first two winters of the experiment.

However, it must be noted the 1968/71 experiment coincided with the introduction of roadside breath tests and the 70mph speed limit, which may have affected the casualty reduction figures. RoSPA became part of the campaign group 'Daylight Extra' in the late 1980s and produced the campaign document 'Light Nights Save Lives' in 1988.

Prior to the European Commission's proposal to end seasonal clock changes, the most recent attempt to change Britain's legislation about lighter evenings was Rebecca Harris MP's Private Members' Bill, "Daylight Savings Bill", which would have required the Government to conduct a cross-departmental analysis of the potential costs and benefits of advancing time by one hour for all, or part of, the year. If the analysis found that this would benefit the UK, a trial would have been conducted and evaluated to finally determine the full effects.

Unfortunately, despite having significant support in Parliament and getting much further through the parliamentary process than any other Private Members' Bill on this topic, the Bill was talked out by a small number of MPs at its Third Reading on January 20, 2012.

In 2017, pedestrian deaths rose from 37 in September to 46 in October, 63 in November before falling slightly to 50 in December. The casualty rate for all road users increased from 520 per billion vehicle miles in October to 580 per billion vehicle miles in November.

The relative peaks are explained by several factors:

- Motorists are more tired after a day's work and concentration levels are lower
- Children tend to go straight to school in the morning but often digress on their way home, increasing their exposure to road dangers.
- Adults tend to go shopping or visit friends after work, increasing their journey times and exposure to road dangers
- Social and leisure trips are generally made in the late afternoons and evenings.

These factors explain why a reduction in the evening accident peak produces more significant results than a reduction in the morning accident peak. We would like to see a move to British Summer-time all year round, as it could save an estimated 30 lives by providing an extra hour of usable daylight during the autumn and winter.



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Any change could also have a significant impact on particular groups, such as older people. For example, the UK's ageing population would benefit from a change to British Summertime. Older people generally do not leave their homes until after the rush hour (10am onwards) and are 'curfewed' by the onset of darkness in the evening. This is determined by several factors including fear of crime, fear of slips, trips and falls and the end of concessionary fare periods. Enabling older people to be out and about later would improve their health and wellbeing, helping to keep them fitter later in life which would reduce their dependence on others, including the state.

Health and wellbeing must also be considered. A change to British Summer-time all year round would bring an increase in accessible daylight during waking hours. Extra daylight hours for leisure activity could help to fight increasing obesity in the UK, particularly amongst the young.

The leisure sector should be considered. A change to British Summer Time all year round would bring a shift in average sunset time year round, meaning the UK would gain "accessible" evening daylight every day of the year.

More evening daylight would encourage outdoor activity, making outdoor leisure activities possible in the evening. It would stay lighter and warmer later each day, making it possible to enjoy more evening meals and drinks outdoors.

Business should be considered. Dependent on the decisions of other Member States, the UK working day could be aligned with continental Europe's for more effective working, including travelling on the day of meetings and fewer overnight stays.

Finally, effects on the tourism sector must be thought out, as a change to British Summer Time could bring a financial boost to Britain's £billion tourism industry. It would extend the part of the tourist season that is dependent upon daylight hours, and enable later closing of tourist facilities – useful as the demand for facilities is greater after lunchtime.

#### **Question 6**

**Which countries would it be beneficial for the UK to coordinate its preparations or choices with?**

#### **RoSPA Response**

RoSPA is not in a position to comment.

#### **Question 7**

**What would be an adequate lead time to prepare for the abolition of seasonal changes of time?**



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### **RoSPA Response**

RoSPA believe that the current timeframe of abolishing clock changes from 2021, and Member States choosing either permanent summer time or winter time is a realistic lead time to allow any Government consultation on discontinuing seasonal changes of time and to allow the country to prepare for any changes.

Under the new legislation, governments opting to make summer-time permanent would adjust their clocks for the last time on the last Sunday in March 2021.

For those choosing permanent standard time, known as permanent winter-time, the final clock change would be on the last Sunday of October 2021.

### ***General***

#### **Question 8**

**Should the Government consult on the proposal? If so, how? How can the implications for different regions of the UK be captured?**

#### **RoSPA Response**

RoSPA believe that the decision should be led by evidence rather than public opinion.

#### **Question 9**

**How can an appropriate level of input by the devolved administrations into the UK Government's approach be ensured?**

#### **RoSPA Response**

RoSPA have no further comment to make.

#### **Question 10**

**How are other EU Member States preparing for the possibility that the proposal is adopted?**



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### **RoSPA Response**

RoSPA is not in a position to comment.

### **Question 11**

**How are non-EU countries with the EU neighbours preparing for the possibility that the proposal is adopted, if at all?**

### **RoSPA Response**

RoSPA is not in a position to comment.

RoSPA has no further comments to make on the call for evidence process, other than to thank the House of Lords EU Internal Market Sub-Committee for the opportunity to comment. We have no objection to our response being reproduced or attributed.

