



HOUSE OF LORDS

Select Committee on the European Union

Internal Market Sub-Committee

Corrected oral evidence: Discontinuing seasonal changes of time

Thursday 17 October 2019

10.50 am

Watch the meeting

Members present: Baroness Donaghy (The Chair); Lord Berkeley; Lord Carter of Coles; Lord Lamont of Lerwick; Lord Lilley; Lord Shipley; Lord Robathan; Lord Russell of Liverpool; Lord Wigley.

Evidence Session No. 2

Heard in Public

Questions 10 - 18

Witnesses

[I](#): Nick Lloyd, Head of Road Safety, Royal Society for the Prevention of Accidents; Dr Justin Andrews, Head of Design Authority, ELEXON; Philip Ireland, Manager, International Air Transport Association.

Examination of witnesses

Nick Lloyd, Dr Justin Andrews and Philip Ireland.

Q10 The Chair: Good morning and welcome. Thank you very much indeed for coming along and, in a couple of cases, providing evidence and, in IATA's case, a position statement. We are very grateful to you for that.

It is my role to ask the opening question. If you want to introduce yourself and your organisation at the same time, that would be fine. This is a public session. There will be a transcript, which you will have the opportunity to correct, but it is open to the public to listen to this session.

Perhaps you could begin by setting out your general views on the Commission's proposal to discontinue seasonal time changes in the EU and, in broad terms, the implications of the proposal for your sector. We are looking at it irrespective of whether we are in or out, the implications being the same in some ways.

Nick Lloyd: I am head of road safety at RoSPA, the Royal Society for the Prevention of Accidents. We like to think that we are the leading safety charity in the country. The Queen is our patron, and we have been around since 1917. We were keen to be here today and, hopefully, provide expert evidence.

This topic has been very close to RoSPA's heart since the 1960s. We supported the pilot carried out in 1968. We also supported Rebecca Harris's Private Member's Bill, the reason being that we are in favour of British Summer Time and the proposal not to change the clocks twice a year, because it saves lives. I will happily expand on that, but I can probably keep it to that, if that is okay.

Dr Justin Andrews: I head up the design authority function for a company called ELEXON. We manage and deliver the wholesale market for the electricity industry. That includes settling the energy actions that National Grid takes to keep the lights on, and the meter-to-bank process for meter data for you and me and commercial and domestic customers.

In summary, there is no significant impact on the electricity industry either way. However, if we were to discontinue seasonal clock changes, it would reduce some of the risk in having the two clock changes in March and October each year, because our computer systems have to sort out having a day with 23 hours, or a day with 25 hours. At face value that may not appear difficult, but it poses a little risk.

The other point to highlight is that it would reduce some of the complexity in the electricity industry and in the environment of technology, trying to get more competition in the electricity industry. Any simplification would be good for getting new players into the market. However, compared with saving or losing lives, I would stress that that is probably small beer.

Philip Ireland: At the International Air Transport Association, we are advocates on behalf of the airline industry globally. We represent 290

airlines and roughly 82% of the aviation business at the minute. As you mentioned, we have submitted our position paper to the European Commission, and I believe you have a copy. It was a joint paper aligned with the European Regions Airline Association and Airlines for Europe.

In brief, putting it bluntly, we are terrified of this change. The UK is in a slightly more unique situation compared with other examples where DST changes have taken place, mainly because our airports are so congested. Making a change of an hour does not seem like a big deal to a lot of people and a lot of airlines, but here where we have so many night restrictions it is very difficult to make. We are at a stage where, if this was to be proposed and enacted and went the wrong way, we would be looking at saying to countries such as the USA and countries in Asia—key markets—“Sorry, you can’t operate any longer”. Our initial position is to request the status quo. Our back-up position is to make recommendations that limit the negative consequences.

- Q11 **Lord Carter of Coles:** One of the criticisms of the proposal, highlighted in the reasoned opinion in our report in 2018, is the lack of justification for the intervention. Do you agree with that assessment? The response was rather slanted and patchy. Do you think that was correctly done and weighed?

Philip Ireland: Yes, I do. It is probably not surprising to hear that I fully agree with that. I do not believe it is justified. If we are to say that the change is justified, there needs to be an understanding of what the consequences are likely to be. I do not believe the EU Commission has carried out a full impact analysis or consultation as yet of what the consequences would be.

Lord Carter of Coles: That is very interesting. You think that in a sense the consultation or evidence was not well prepared.

Philip Ireland: I do not believe it is enough. It is still relatively open. We have our position paper, for example. We could go into a lot of technicalities to help the Commission understand what the change is likely to do. Even from our perspective, where we have the ability to tap into all the different airlines’ issues, for us to be able to say exactly what the impact is going to be is very, very difficult. So many different scenarios could be played out, in particular where we have differences as to which state is going to do what within Europe and how that interacts with the rest of the world. From our perspective, because we are in such a constrained capacity environment in the UK, we know quickly that it is going to be a bit of a disaster.

Nick Lloyd: Looking at the evidence from previous studies of road safety savings, we think it is completely justified. Because we get more casualties in the evening than in the morning, when we put the clocks forwards and backwards, it is estimated that that contributes to 30 extra lives lost in the country per annum.

I think the EU said that some of the road safety evidence was inconclusive. That is not what the last study, from 2018, found. The study was done by the RAC Foundation and Road Safety Analysis. They looked at six years of accident data called STATS19. They looked at data between 2012 and 2017 and compared the number of collisions happening two weeks before and two weeks after the clock changes in March and October. They found that, on average, over that period there were 204 more personal injury collisions per year over the two fortnightly periods when the clock changes took place, which is an overall increase of 2% in accidents. RoSPA's position is that there is clear justification in the United Kingdom for adopting British Summer Time.

Dr Justin Andrews: I cannot comment on the intervention or whether there is enough evidence.

Lord Russell of Liverpool: Mr Lloyd, looking at your evidence, when you were asked questions that involved the views of other countries, you said that, by and large, you were not in a position to comment, but you must have some views as to whether the evidence you quoted in relation to the United Kingdom has parallels in other geographies, particularly those in the same latitude as us and, therefore, with the same amount of daylight and changing of clocks. Do you have evidence from other countries that is similar to what you are citing?

Nick Lloyd: I could not quote a research study. However, when we compare like countries in Europe, my feeling is that there would be the same benefits. The reason you have more collisions and casualties in the evening is that, first, parents tend to drop off their children at school and they make their own way home in the evening and then divert. There are obviously more leisure activities in the evening, and so on. Culturally, when you compare the United Kingdom with countries such as Germany or France, my understanding is that you would have a similar effect, mindful of the fact that there is already more daylight across Europe because they are on European time, for example, so they are an hour ahead of us in the winter anyway. My strong feeling is that there would be a positive effect right across Europe.

Lord Russell of Liverpool: I respectfully suggest that, if you had evidence to back that up, your case would be rather stronger.

Lord Lamont of Lerwick: Mr Ireland, I am very new to this issue on this Committee. You said that the USA as a key market could not operate any longer. Did you literally mean that?

Philip Ireland: It is a risk. If we choose Heathrow as an example, it officially opens at 6 am. For the first hour, the flights are largely from North America: Chicago, Washington and all over North America. We have a few night-time flights just before that, also from the Americas, Asia—Singapore and Hong Kong—and Dubai in the Middle East, with large carriers bringing lots of people to the UK.

The trick is that if, hypothetically speaking, the UK was to remain without DST on a winter solution, the airlines would have a choice. They would need to try to change their slots at one end or the other in order to make their block times work; they would just need to make a one-hour change. Some 64% of the routes from Heathrow are between congested airports where there is little room for manoeuvre at either end. It is about double the global average, so we are already working in a very constrained environment.

At Heathrow, we also have night-time restrictions. A winter schedule would require the same schedules at Heathrow to be one hour earlier, which would move all the flights in the 6 am hour into the 5 am hour, where there are restrictions. There are no more flights and there is no further possibility to operate. In those circumstances, they would not be able to operate.

Lord Lamont of Lerwick: The key to it is the restrictions.

Philip Ireland: Yes, there are capacity restrictions and environmental restrictions. I am not saying that they are right or wrong; it is just that that would be the impact. They would be looking for somewhere else to operate in the day. The hour that would be freed up would be at the opposite end of the day, the final hour from 10 pm, which is much less commercially viable compared with the morning. There would not be a natural move to the end of the hour.

You might think that there could be a knock-on effect throughout the day to try to create some space, and everyone would move one hour earlier. That would not be the case either, because we have a mixture of airlines operating from different destinations and different DST zones throughout the day, so we cannot even suggest that there would be a knock-on effect to try to alleviate the problem. It is okay if you are an airline with a pool of slots at Heathrow; you have a bit of flexibility and you can try to minimise the impact. If you are an airline with no flexibility and do not have that choice, which is the majority of airlines at Heathrow, it will be much more difficult to find a solution.

Q12 **Lord Lamont of Lerwick:** Perhaps I could ask a question of all of you. We have heard about engagement with Europe. What engagement have you had with the UK Government on the proposal so far? When would you expect formal consultation to take place, and has there been any discussion of the proposal and its implications with your membership or key stakeholders?

Nick Lloyd: With regard to the first question, we engaged with the Government inasmuch as we responded to the consultation in August. You have a copy of that. When would we expect formal consultation to take place? I am probably not in a position to answer that question.

In relation to consultation, we believe that whatever decisions are made should be evidence led. I would question whether consultation is the right approach. The reason is that there is a lot of misinformation about this

topic. I cannot quote evidence from research studies in Europe, but the evidence in the UK from what is now a 40 year-old pilot study and the latest evidence, in 2018, shows that there are positive road safety benefits. Nevertheless, there is still a lot of misinformation; for example, the general public, certainly in Scotland, feel it would be detrimental to them. When you look at the information on road safety, health, economic benefits and so on, everyone in the UK would benefit. I tactfully put it that we have to think carefully as to whether consultation is the correct way forward, unless there is clear information that sets out carefully what the positive and negative effects would be, and then the public can make up their own mind before they respond to the consultation.

The next question was about discussions we have had with our stakeholders. We have discussed this topic. I think I said at the start that it is something RoSPA is very keen on and has been campaigning for over many years. In October last year, when the EU first announced the proposal, we discussed it at our national road safety committee, which is made up of intellectuals—people who are very knowledgeable about road safety from fire and rescue, the Department for Transport and police. We discussed it at our October committee and from that we changed our policy position. Previously, we had been supporting single double summer time, so in effect you would be two hours ahead in summer and one hour ahead from where we are in winter. We subsequently changed that to support this measure because we believe it is more realistic and attainable. Following that, we discussed it again this week at our main committee.

With regard to engaging our stakeholders, we have written numerous articles over the past 12 months in our digital online publications for members and in our magazines, such as *Care on the Road*. We have given our members an opportunity. We have informed them what is happening and given them time to comment and respond to us. We have clearly stated what our policy position is, based on discussions with our national road safety committee.

The Chair: Before we ask Dr Andrews to answer Lord Lamont's question, have you had any direct discussions with the UK Government, as opposed to this Sub-Committee?

Nick Lloyd: No, we have not.

Dr Justin Andrews: We have not had discussions with the UK Government, our energy regulator Ofgem or the electricity industry, primarily because it does not have a significant impact on the electricity industry. There are lots of bigger changes ahead.

Philip Ireland: At IATA, with regard to EU involvement, we are keeping our ear close to the ground to find out what the situation is and how different states are feeling. Our understanding and assessment at the minute is that states do not appear to be too enthusiastic to drive forward the proposal at this stage. We are under the impression that there are more important topics on their minds. Apart from our

submission to the Commission itself, we have made no further engagement with individual states, apart from general conversation to try to get an idea of which way they could go.

I am not aware of any formal discussion with the UK Government. It is possible that our local representation has had one-to-one discussions, but nothing formal.

With regard to the IATA membership, we have two advisory groups with which we are currently working. One is the slot policy working group, which is a representative group of 22 airlines from around the world. It includes two non-member airlines; Norwegian and easyJet are part of the group.¹ We have kept them fully updated and we take our positions from the advisory group, which is made up of scheduling and network planning professionals.

We also have an industry affairs committee that guides us from an industry perspective and is much more closely related to working with Governments and the industry. It is fully supportive of our position on this. Discussions from the two groups are shared among the whole membership. All IATA airlines are kept involved, and we welcome any input that they may have. To date, we have seen complete alignment on the position.

Q13 Lord Berkeley: I declare an interest in that I have supported RoSPA's activities for 10 or 20 years, and I supported the Bill that was discussed.

I think evidence of the need to have lighter evenings is very strong because of road accidents, as you put in your evidence, Mr Lloyd. My concern is that the Commission is proposing that there is no change in the spring and autumn, as I understand it. If we do not remain in the EU, we are still free to have changes in the spring and autumn presumably, so we are going to get a hotchpotch of different scenarios, not just changes in spring and autumn but different arrangements between member states that may go their own way. I have questions for each of you.

Mr Lloyd, have you been trying to persuade road safety people in other member states of the great advantage of lighter evenings? Portugal is different from Spain at the moment. It is all very different there, and then you get to the east of Germany; and Switzerland is separate. There is very strong evidence and I am sure they think the same way.

Dr Andrews, why does it matter what we do within the UK except in so far as you have cross-channel international connectors? How important are they, and what could be the different scenarios depending on how the time changes?

It is the same question for the airline industry. Mr Ireland, is the fact that things at the moment change in spring and autumn the problem, or is it the fact that we might have a different fixed timescale between us and

¹ The witness later clarified that easyJet is not a member of the slot policy working group, while Norwegian and Ryanair are.

other countries of the world? Mr Lloyd, would you like to go first?

Nick Lloyd: Errol Taylor, RoSPA's chief executive, emailed his European counterparts to sound out opinion across Europe. It is not central to many people's thinking at the moment. Probably the commonality is that we all have vulnerable road users: pedestrians, cyclists and motorcyclists. "Look and fail to see" and the conspicuity issues are the same across Europe. However, I do not think that this proposal has been very prevalent, or a central topic, in the minds of our European colleagues on road safety.

Lord Berkeley: Is it because we have street lighting virtually everywhere now, compared with 20 years ago, when the emphasis seemed to be on whether cows needed milking in the daylight or not, which seemed a rather ridiculous idea? Is it because we have more lighting and therefore the difference is not so great?

Nick Lloyd: I think the difference is still just as great. In England, there is now a trend for highway authorities to turn off or dim lighting, so you could argue that it is worse now than it was.

Dr Justin Andrews: In summary, I think the impact will be small either way. It is not as if this is going to stop all the electricity flowing between us and other EU member states. Currently, we have four interconnections: one with France, one with the Netherlands, one with Northern Ireland and one with southern Ireland. Over the next decade, I understand that we will probably have another 17 new interconnections with other EU member states. That is great for the energy industry here because it gives us more flexibility, and hopefully we can use more renewable power and save a bit of carbon.

I would like to point out—it was in my submission—that, if the EU adopts the proposed approach but we choose not to comply, the companies that run those interconnectors, or companies that trade over those interconnectors on the basis of the difference in market price, will see an impact on their computer systems, but it would be a small impact. If we were to adopt it, there would still be impacts on them because of the changes, whatever we decided to do. I would summarise it by saying the impact is small, but there would be some impact if we chose not to adopt it and the EU did.

Philip Ireland: From IATA's perspective, the context is that aviation has developed global networks that have been fine-tuned over the years, so whether the change of DST is the issue or there are timings in different seasons, it is the change that makes the difference. For example, if 20 years ago, or probably longer, we had already had that change and the industry had developed its global networks with those timings, that would be absolutely fine. The question is the change from what we have now. The way the global networks have developed has put the UK into a highly competitive and connected position. Both OAG and IATA economic data show London to be the most connected city in the world. The question is about the likely impact of making the changes.

We believe that, with regard to relationships with Europe, a change of times would put the UK in a less competitive position. Airlines would struggle to compete with airlines that had to cross other parts of Europe. A simple example would be businesspeople looking to fly to Europe for a meeting. Under the worst circumstances, they would be delayed by a further hour. We are already up to two or three hours behind other parts of Europe, so, by the time they get to Europe and their meeting, the morning has already gone. It will be worse in that situation.

Lord Berkeley: It is like that at the moment.

Philip Ireland: It would be an hour worse if you went for winter and they were on summer.

Lord Berkeley: It is an hour's difference at the moment.

Philip Ireland: Yes.

Lord Berkeley: It is a difficult thing to get to Europe for meetings, so what is different?

Lord Lamont of Lerwick: An hour.

Lord Berkeley: I know, but—

The Chair: Thank you.

Dr Justin Andrews: I would like to add something regarding street lighting. I do not think the Highways Agency or local authorities are going to be switching off lights at peak time. Our experience of dealing with what we call metered supplies for street lighting is that people have been looking to install LED lighting or put in more complex control systems and switch lighting off when it is not needed in the dead of night.

Lord Berkeley: You might do that to provide more power for people charging their cars at night, which will probably have a much bigger effect in the long term.

Dr Justin Andrews: Yes, and other arrangements, hopefully.

Q14 **Lord Shipley:** The question I was going to ask has been answered, at least in part, but for absolute clarity I will ask it. If the proposals are agreed when the UK is no longer bound by EU law, the UK Government will be faced with the choice of maintaining seasonal time changes or abolishing them in line with its EU neighbours. I would like each of you to say what the implications would be for your sectors if the UK maintained seasonal changes of time while they were abolished across the EU.

Nick Lloyd: The implication if we maintain the current system, the status quo where we have two changes, is that people will simply die needlessly. I mentioned the estimate of 30. I can evidence that by referring to the 2017 road traffic casualty statistics compiled by the Department for Transport. Pedestrian deaths then rose from 37 in September to 46 in October; they went up to 63 in November and fell slightly to 50 in

December. In 2018, there was a similar profile; there were 42 in October, but they rose to 56 in November and 70 in December. There are clear implications from the road safety sector that there would be very negative effects. Basically, people are dying needlessly in the system we have. Adopting British Summer Time would mean that people would still be alive who might not necessarily be alive if we stay as we are.

I mentioned earlier the study by the RAC Foundation. Looking at 2012 to 2017 data, that independent study found that in the fortnight following the end of British Summer Time there were on average 102 more collisions involving pedestrians, which was an increase of 11.2%.

Dr Justin Andrews: I hope I can answer this in the right way. If the EU adopts it and we choose not to comply, there is no change to the energy industry, and there is only a fringe change to the computer systems of people who are either operating the electricity interconnectors or trading over them. That is a minimal impact.

If we choose to comply and get rid of the change to British Summer Time, again there is a minimal impact on the central energy industry, because what we will be doing is removing the clock change that happens two days a year: one at the end of March and one at the end of October. If we remained, we would recommend GMT or UTC because a lot of the data from the meters are stored in GMT. There would then be a programme to implement the changes to central systems for people who trade in the market.

Philip Ireland: Within the UK, we have seven airports that we call level 3 airports; they are the most congested. Excluding Heathrow, those airports are heavily reliant on EU routes. At those six airports, between 70% and 87% of routes are dominated by EU destinations. At Heathrow, it is more of a 50:50 mix between other global destinations and Europe. Under the circumstances you mention, where the UK continued with DST changes and went back to UTC in the winter, if the EU removed DST completely, or stayed in summer time as well, it would be our winter that would suffer the most. That is where most changes would come about.

Having said that, because there is so much reliance on those routes to Europe at the other six most congested airports and 50% at Heathrow, there will still have to be rescheduling and finding of new times. There will still be an impact and we will still be looking for solutions to ensure that connectivity remains. It would be slightly easier for us in the summer than in the winter, depending on exactly what the EU does.

The Chair: There is a difference between summer and winter. I assume that the connection with the other airports is that people are flying away on holiday to European countries. What would be the proportion of flights in the summer compared with the winter? Presumably, there are a lot more in the summer.

Philip Ireland: You are right. I do not have the exact proportions or numbers. What I can tell you is that in the summer, within the EU, we

have 104 level 3 airports with the same mix, but in the winter season there are only 74, so there is much more congestion in Europe in the summer time.

The Chair: It is quite startling.

Philip Ireland: Yes, it is. The Greek islands in particular suddenly have a big increase in congested airports. You are right; a lot of it is about tourism.

Lord Berkeley: Is there more congestion in the summer time because more people want to travel to holiday destinations or because of the timing? Which is it?

The Chair: It must be the holidays.

Lord Berkeley: It is the holidays; it is nothing to do with the timing.

The Chair: I was just interested.

Lord Berkeley: I am not getting at you, Chair.

The Chair: I do not mind being got at.

Lord Carter of Coles: On the interconnector point, I thought the purpose of the interconnector was load-balancing between different countries, but that is not the case; it is just economic, so there would be no consequence if we shifted to a different time pattern from the one we have now. It would alter the price of electricity that moves up and down the interconnector and would, therefore, have a detrimental or positive economic effect. Do we have a model for that?

Dr Justin Andrews: For the majority of the time, we import energy into the UK. The percentage has decreased over time, but it is a market force; it is the difference between the price in Europe and the price here.

Lord Carter of Coles: That is the point. If we got up later and turned our kettles on an hour later, would it alter the loading factor in Europe that sells us electricity, so there would be a marginal cost in both places? I just wondered if there was a model.

Dr Justin Andrews: There is no model, but if you are shifting load to more peak times in the day that would have an impact.

Lord Carter of Coles: There might be an economic effect from the changes. I am just curious as to what it might be and how we might arrive at it.

Dr Justin Andrews: The aim of the energy industry in future is to be more flexible and remove peaks, using things like batteries and storage to try to smooth them off. In future, I hope that with the technology in batteries, the peaks would not be so prevalent. The opposite factor is the rollout of electric vehicles, which will create huge demand, but it also

gives you the ability to store energy and get energy back from the battery in the electric vehicle.

Lord Carter of Coles: You have to wonder why there are 17 interconnectors coming then, do you not?

Dr Justin Andrews: Economics.

Lord Carter of Coles: Well, there we are. That is the point. It is differential pricing. I am surprised at the fact that we do not have a model, because it seems quite a central point. I can hear the argument about 30 deaths being saved, but I cannot put a further number on these things, as I am sure we can on the IATA information.

The Chair: Lord Shipley, are you happy with the answers?

Lord Shipley: I want to ask a supplementary, which is indirectly related. As I understand it, Mr Lloyd, from the written evidence, as well as from what you have said, you are in favour of a move to standard British Summer Time.

Nick Lloyd: Yes.

Lord Shipley: Dr Andrews, you would probably prefer GMT, but actually you could manage it perfectly well.

Dr Justin Andrews: Yes.

Lord Shipley: Mr Ireland, you are in favour of the status quo. Is that broadly it? Is there anything you want to add to the conclusions that I have drawn from all the evidence you have given?

Philip Ireland: Our first preference is the status quo across the whole of Europe. If there is no status quo across all states, we would request that all states move in the same direction and adopt the same change, which in our preference would be summer time.

Q15 **Lord Russell of Liverpool:** Ever the optimist, I think this question is probably directed mostly to you, Mr Ireland. From a practical point of view, the Commission originally wanted to have this enacted right across the EU by the end of this calendar year. That was somewhat ambitious, and it has now realised that it is a bit more complicated than that. On the assumption that the United Kingdom decides to go to a single time zone, whichever it may be and whenever that may be, from a practical point of view how long would your sector require to plan for that? How much time would it require to be able safely to put in place new arrangements?

Philip Ireland: We would need a minimum of 18 months, but, assuming it was to be aligned in the summer season, it would be 18 months but at the start of the next summer season. If a decision was to be made today, we would request that the new process began at the start of the summer season in 2022. To highlight it, that is roughly two years, and the lead time I am talking about is the bare minimum. We do not expect the

issues to be resolved in that time; they will continue for years and years after that, to get us back to the position we are in today.

Lord Russell of Liverpool: Do you have a rough guesstimate of how much it might cost the industry?

Philip Ireland: That is an incredibly difficult question, to be honest.

Lord Russell of Liverpool: I did say guesstimate.

Philip Ireland: I apologise for not fully answering the earlier question on consultation, as it occurred to me afterwards that it touches on this. To get an idea of costs, we need to know the value of the services operating, or the services that are going to be impacted. We would need to know how they can be reallocated slots at the different airports, both here and within Europe. There is such a mixture of airlines and it is so complex that I could not even guess what the outcome would be.

I am sorry, but I cannot give an answer. The only way we could find out would be through analysis involving work with co-ordination organisations in Europe and the UK to model what could happen, but even then we would still be guessing what other capacity inputs and factors had an impact on those decisions. I really could not guess. It is such a difficult question to answer.

The Chair: Could it affect certain airlines and make them more vulnerable?

Philip Ireland: Yes, it could. In particular, when we make a comparison against Europe, if we were in the worst-case scenario, where the UK was on winter times and other states were on summer times, the extra hour difference would mean that, on connectivity, European hubs were more competitive compared with the UK, purely because they would be trying to get to their ultimate destination at the existing time. There is a risk that we will lose out to those hubs, and airlines offering those services are likely to be affected, as would be smaller operators. The majority of operators within the UK operate with single frequencies to the UK. If those airlines were flying at the start or the very end of the day, depending on what the situation becomes, they would be at risk as well.

The Chair: Lord Lilley, I think quite a lot of your subject has been covered.

Q16 **Lord Lilley:** Indeed. I was supposed to ask whether you can spell out your positions in more detail, but, as you have spelled them out in detail, I do not need to. Perhaps I could ask Mr Ireland, who has illuminated things for me considerably, whether I have fully understood.

First, let us suppose that nobody in Europe changes anything, so we are just considering what happens if we change something. If we changed our time to British Summer Time all year round, and we had no restrictions on night-time flying, would there be a problem? That is one question.

Secondly, if we set our restrictions on night-time flying by solar time, so that they did not change by solar time when we changed to BST, would that solve the problem?

Thirdly, would the change in British Summer Time mean people wanting to travel at different times of day so that, even if you sorted out the restrictions on night-time flying, there would still be a problem?

Philip Ireland: Okay.

The Chair: I think he may need a fortnight's notice of that question.

Lord Lilley: I am sure he can understand it.

The Chair: I am sure.

Philip Ireland: I have to admit that I might come back to you, if that is okay, about the solar time. First, let me focus on circumstances where nobody there makes a change but the UK chooses to make a change, and there are no night restrictions. That would certainly make it easier for the UK to align itself. However, any move that the UK makes away from the rest of Europe would break the existing connectivity banks that the airlines have coming through the UK.

Right now, airlines try to align their services as closely as possible to consumer demand, for freight as well as passengers. If because of the change it results in a one-hour difference, either passengers or freight will be prepared for the connections to their ultimate destination, whether coming this way or that. They might be one hour earlier or those connections might be lost, because the feeder into those connections and the hub is going to be one hour after. It depends on what the UK decides to do.

Lord Lilley: Is that not assuming that, if we have a flight that leaves at 9 am now and we change the time, it will leave at 9 am in British Summer Time? Why could they could not just keep it at 9 am solar time, if you see what I mean?

Philip Ireland: Right, yes. There is a decision to be made by the airlines as to whether they continue to set their schedules in UTC or in local time. It probably suits passengers, consumers and businesses to have it in local time, but that will require a change in the schedules according to UTC time, and that is where we are looking to make sure we can actually make those changes.

If the airlines were to continue scheduling according to UTC, it could be one hour's difference compared with the local time, whatever the change might be, so it would not be so aligned with the demand. That is exactly what happened in Turkey. One of the airlines there decided to focus on UTC, and it impacted on its connectivity from the perspective of not offering the preferred times to consumers, but it felt that was the best of both worlds in that case.

Q17 **Lord Robathan:** First, I apologise for being late, although you started

commendably early.

One of the few advantages of getting old is that I remember the last experiment, when I was still at school and university, in 1968 to 1971. There are perfectly reasonable and different views as to whether we should change the clocks at all, and whether we should go to summer time full-time or GMT full-time. They tend to vary a bit with latitude. Most people would probably like not to change the clocks. For myself, I am perfectly happy to change them. But these are somewhat subjective views, and we need to concentrate on the evidence. Mr Lloyd, what is the evidence that the experiment between 1968 and 1971 improved road safety?

Nick Lloyd: Can you can bear with me while I look at my notes? The evidence was that there was an overall reduction of 11% in casualties during the study. England and Wales saw an 11% reduction, and Scotland saw a 17% reduction during that period, and it was estimated that, overall, about 2,500 fewer people were killed or seriously injured during the experiment. There is a bit of a caveat. Between 1968 and 1971, breathalysers came in, and there was the introduction of 70 mph speed limits, so it is difficult to quantify how much of the 2,500 figure or the 11% reduction was attributed to which measure. However, I come back to the study I have mentioned a couple of times, the 2018 RAC Foundation study, which, coincidentally, found an 11% reduction last year.

There is clear evidence from the pilot study, which obviously you remember as a child, but we cannot quantify exactly how much. What we can quantify very clearly when we look at data, for example, from 2017-18, is that generally speaking, when the clocks go forward in March, there is a small casualty saving, but when they go back in October there is a much bigger spike in accidents. Overall, there is a positive benefit, which was common to the new study and the earlier one.

Lord Robathan: To go back to 1968, you have put some pretty major caveats on that, so I am not sure that the evidence is quite as clear as you suggest from that study. Furthermore, it begs the question why people voted in Parliament in 1970 to go back to the old system, but we cannot question what happened, depressingly, nearly 50 years ago.

However, I would pick you up on the evidence you put forward. You have not really factored in the point that the amount of light is finite, and the roads are getting darker. Whatever you do with the timings, the roads are getting darker. Furthermore, there is fog and frost and such things. It is not really surprising that when there is less clear light, unless people slow down, there are more casualties. I am not sure that the evidence you suggest bears close scrutiny. Of course, we could have another pilot to see whether it works, but I think that the finite amount of light is really what leads this thing. Would you like to comment on that? How do we get more light?

Nick Lloyd: The crux of the Rebecca Harris Bill, which was talked out in Parliament at its Third Reading, was the very point that you make: there needs to be further analysis to see what the implications would be, and then a further pilot.

You are quite right. There are plenty of caveats, and you would expect there to be potentially more casualties when the weather is bad, and so on. Actually, the Department for Transport's casualty analysis says that, when you have a bad winter, you have fewer road casualties, because people regulate where they drive, or they do not cycle or walk, and so on. It is not always as clear-cut as you think; bad weather does not necessarily equate to more casualties. The issue is the sudden darkness change when we put the clocks back. People take time to adapt. If we did not put the clocks back, there would be a gradual process of losing light in the winter, rather than suddenly losing an hour's light.

Lord Robathan: Your thesis is that adaptation time is needed.

Nick Lloyd: Yes.

Lord Robathan: Except that you then go on about 50 people being killed in December, six weeks after the adaptation time. Sorry, I just point that out.

Nick Lloyd: Adaptation time is very important in the immediate time period. Statistically, the rise happens; the figures speak for themselves. It comes back to the point about the RAC study, which looked at data from 2012 and 2017, two weeks before and two weeks after. That is the adaptation time I was referring to.

Q18 **The Chair:** We are seeing the Minister next week, Kelly Tolhurst, and we have a number of questions to ask. What do you think the Government should be doing to get additional evidence to help them take the decision? It is not about whether we want summer time or winter time; it is about the implications of varying from whatever the EU decides. It is quite difficult to slip into the other side of the subject, which is what we prefer. In our report, we are trying to get down to what the implications would be if we took a decision to vary from whatever the EU decides. We could ask the Minister a question, if there is anything you think would be useful along those lines. We have plenty to ask her, so do not worry if you have no suggestions.

Dr Justin Andrews: I would suggest a robust impact assessment, putting lives—although not insignificantly—to one side, and looking at the cost of the change or the cost of the difference. What is the cost to the air industry? Mr Ireland did not put a figure on it, but in my simple mind I am thinking of hundreds of millions of pounds, or maybe more. Evidence-based decisions are a good principle to follow, and I am sure that is one of the reasons to have a Select Committee. It is about cost implications and timescales. That would be my view.

Philip Ireland: I agree. A full impact assessment would be ideal. If it was opened up to individual airlines as well, I think they would be very keen to feed into that, to highlight the risks they see.

The Chair: Are there any other thoughts before we close the session? I am intrigued by the fact that, in one bit of evidence we received, it was pointed out that in both World Wars we changed the time; then at the end of the war we went back again. I wonder what the factors were on which they made that decision. It might not have been based on evidence at all, but somebody somewhere took the decision that there were advantages during wartime.

Lord Lilley: I think most aircraft movements at that time were not scheduled.

The Chair: No, I appreciate that World War I might not be of interest to IATA at this stage.

Nick Lloyd: May I add a little further information? I have focused very heavily, obviously, on road safety, which is RoSPA's primary focus. We mentioned in our submission that there are other benefits.

Road safety is very linked to other key governmental objectives such as health and well-being, active travel and obesity. The evidence is that more daylight in the evening encourages parents to allow their children to walk to school, for example. The wider population tends to be more active when we have more daylight; as soon as the clocks go back, people tend to hunker down and pull the curtains to, and so on.

There is also evidence on crime and personal safety. In 2005, a MORI poll found that, if the clocks were not put back, 70% of Londoners and 66% of Scots said that they would feel safer walking outside late at night. There are other important factors to consider as well as road safety. There are wider environmental and health benefits.

Lord Robathan: Mr Lloyd, if you have found the solution to the obesity crisis in this country, I am delighted, but I have to tell you that I think crime takes place in darkness, and the amount of darkness in December is not going to vary wherever the clocks are. It is just the case. More crime takes place in darkness, anyway.

The Chair: Are there any other points that people want to make?

Dr Justin Andrews: You may already have thought about this, but over 10 years ago we used to have a month's difference between the clock changes for us and Europe, for the whole of October. Is there any evidence from that time of what the implications were?

The Chair: That is an interesting point. Thank you.

Lord Carter of Coles: I have a question for Mr Ireland, building on the evidence-base point. We have a difference between the United States and us; we are on a different time change, of about a month. What is the

impact of that on the airlines?

Philip Ireland: It is very frustrating.

Lord Carter of Coles: Frustrating is one thing, but can you put an economic value on it?

Philip Ireland: I cannot put a value on it, but the worldwide slot guidelines that everybody works to as a standard have created principles to deal with that difference in particular. It is even worse with Latin American countries, where they are much earlier—I think it is in February, and I forget the other date. We have requested that the allocation of slots should be treated with greater flexibility for those four or five weeks. The impact of that means that airports are oversubscribed for those four or five weeks or undersubscribed for the rest of the season. In general, it means that they are slightly oversubscribed, and delays are slightly longer.

The Chair: Thank you. Do you have any thoughts you want to leave us with before we close the public session?

Philip Ireland: Out of interest I was also looking into the wartime changes. I do not think that it really affects this, but I noticed that a lot of it was to do with trying to save energy due to shortages at the time, which then improved after the war.

I also had a thought with regard to your question about what we could ask the Minister. It occurred to me that she might be in a good position to assess where the EU Commission is right now and perhaps even encourage it into certain lead times. In the case of Turkey, it had roughly five and a half years before making a change. The consultation was in 2009, and it actually made the change in 2016, following an impact analysis. That would be my suggestion for a question, to see if we can influence the lead time to minimise the impact.

The Chair: Turkey took five and a half years.

Philip Ireland: Yes.

The Chair: We would certainly be interested in the question about where the Government see the Commission right now. We understand that the Finnish presidency is very keen on this, so at least for a period of six months it is going to keep it active, but the EU audit committee has questioned the quality of the research that was undertaken in the first place. There is all to play for, and we will certainly be asking questions in the public session, so you will be able to see her evidence. Lord Shipley, did you want to ask something?

Lord Shipley: One thing I was struck by, Mr Lloyd, is that in your initial submission you said something to the effect that RoSPA had changed its policy. You had had a two-hour policy to improve road safety even further, but recently a decision had been made to reduce that to continuous BST. It might be helpful if you could write something further

about the policy change and the reasons why RoSPA altered what I think has been a long-standing policy.

Nick Lloyd: I can very quickly answer that. Our preferred option is still single/double summer time. However, we think this is a more practical way of achieving what would probably not give as great a road safety benefit but is more likely to happen than if we carried on. We have taken a pragmatic approach.

The Chair: Do we still need a written response? That probably covers the ground.

Lord Shipley: It is probably sufficient.

The Chair: Yes. Thank you very much indeed. It was a very interesting session.