



*European Economic and Social Committee*

**TEN/685**  
**Discontinuing seasonal changes of time**

## **OPINION**

European Economic and Social Committee

**Proposal for a Directive of the European Parliament and of the Council discontinuing seasonal changes of time and repealing Directive 2000/84/EC**  
[COM(2018) 639 final – 2018/0332 (COD)]

Rapporteur-general: **Maria NIKOLOPOULOU**

Referral	European Parliament referral, 13/09/2018 Council referral, 19/09/2018
Legal basis	Art. 114, par. 1, and 304 of the Treaty on the Functioning of the European Union
Bureau decision	18/09/2018
Section responsible	Section for Transport, Energy, Infrastructure and the Information Society
Adopted at plenary	17/10/2018
Plenary session No	538
Outcome of vote (for/against/abstentions)	109/1/6

## 1. **Conclusions and recommendations**

- 1.1 The European Economic and Social Committee (EESC) takes note of the proposal by the European Commission to repeal seasonal changes of time. The Committee indicates a number of important limitations concerning method, time-scales and content. For these reasons it considers it essential to provide more time for debate and analysis. It is crucial to reach a broad consensus among citizens and the unanimous support of all the Member States to ensure effective, harmonised and consensual implementation of the proposal.
- 1.2 The EESC recognises the interest of some European citizens in repealing the current mechanism which established a harmonised bi-annual change of time, as shown in the recent online-public consultation. The Committee sees well-conducted on-line public consultation as a tool that can provide indications about public preferences and supplement established democratic processes. It regrets that national governments and organised civil society were not sufficiently consulted prior to the urgent publication of the proposal.
- 1.3 The Committee considers that the Commission's public consultation raised an important issue for some EU citizens, mainly because this topic has been discussed for several years in some Member States, but not in some other ones. Nevertheless, the Commission did not take into adequate account that a large majority of participants were from a single country, the proposal was rejected in certain Member States, and there is no clear unanimity about the real benefits of abolishing the current harmonised arrangement or whether it would be better to adopt winter or summer time.
- 1.4 The Committee points out that the urgent procedure adopted by the Commission was criticised in several Member States, with citizens considering that the EU's priorities lie elsewhere (the economic crisis, unemployment, immigration, etc.), which may lead to problems with the initiative's social acceptance.
- 1.5 According to the proposal for a directive, the principle of subsidiarity would mean that each country is free to keep summer or winter time throughout the year, replacing the current harmonised system which has extensively demonstrated its efficiency. The EESC, as well as the Commission, considers that unanimity between all the Member States on which time to select is essential if the current level of harmonisation is to be ensured. Otherwise, the time difference between countries who are currently in the same hour zone could cause fragmentation and distortion of the internal market.
- 1.6 The Committee notes that implementing the initiative would entail reprogramming all digital systems and devices on a global level, with an obvious economic cost to businesses and governments and a possible impact on people. The transition towards a new hour system will require a long period of ICT testing in advance to ensure its effective implementation. In the event of a negative result from the impact assessment scheduled for 2024, a rapid reversal would be inconceivable, due to the additional costs and the impact on the credibility of the European institutions. Once again, this shows the need of more time to broaden the studies, data collection, political will and social acceptance by citizens before making such a sensitive change for states, citizens and businesses.

## 2. Gist of the Commission proposal

- 2.1 EU legislation on summer-time arrangements was first introduced in 1980 with the objective of unifying existing national summer-time practices and schedules that were diverging, thereby ensuring a harmonised approach to the time switch within the single market.
- 2.2 Since 2001, EU summer-time arrangements have been governed by Directive 2000/84/EC, setting 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.
- 2.3 However, based on the principle of subsidiarity, decisions on standard time are taken individually by the Member States for their entire territory or for different parts of it.
- 2.4 The system of bi-annual clock changes has recently been questioned in several European countries, as shown in the public consultation carried out by the Commission between 4 July and 16 August 2018. There were approximately 4.6 million replies to the public consultation, 84% of which were in favour of stopping the bi-annual clock changes, against 16% in favour of keeping it. Those in favour of stopping the clock changes voiced a preference for summer time (60%). It is important to note that a large majority of participants were from a single country (Germany, with 3.1 million) and that the proposal was rejected in some countries (Greece and Cyprus) or no clear majority emerged (Malta).
- 2.5 In its resolution of 8 February 2018, the European Parliament backed the idea of a change to the current arrangement, and called on the Commission to present a legislative proposal. The transport ministers recently addressed this question at the June 2018 and December 2017 Council meetings, without achieving clear unanimity. The question has not been debated by other relevant ministers, nor previously discussed during meetings between the prime ministers. Neither has the EESC been consulted previously.
- 2.6 The proposal is to repeal the current mechanism establishing a harmonised bi-annual time change, keeping the same time throughout the year. The time will be set, in keeping with the subsidiarity principle, by each Member State. The Commission hopes that all the countries will, without exception, adopt the same summer and winter time in order to retain the current harmonisation and avoid fragmentation of the internal market. The proposal would enter into force on 1 April 2019.
- 2.7 The Commission recognises that available research on the energy, health, road safety and agricultural benefits linked to time changes are not always conclusive. What has been demonstrated is that an absence of time harmonisation can have an impact on the single market, air, maritime and road transport, and on people travelling for leisure or work<sup>1</sup>.

---

<sup>1</sup> Study conducted on behalf of DG MOVE by ICF International: [The application of summer time in Europe](#), 19 September 2014.

### 3. **General comments**

- 3.1 The EESC finds interesting the European Commission's proposal to remove seasonal changes of time, as laid down in Directive 2000/84/EC, but points to a series of important limitations concerning methods, timescales and content. The Committee considers it vital to give more time for debate and analysis, in order to reach a genuinely broad consensus between citizens and the unanimous support of all the Member States. These factors are crucial if effective and harmonised implementation of the proposal is to be ensured.
- 3.2 The Committee considers that the method used by the Commission - an online public consultation conducted between July and August 2018 - offers interesting data about the expectations of part of the European population, but it is not the only available tool to evaluate public opinion. In view of the numerous political, economic and social impacts, organised civil society and a larger number of Member States should have been properly involved and consulted before presenting the proposal.
- 3.3 The Committee notes that the public consultation did not identify real unanimity among all Member States (the proposal was rejected in Greece and Cyprus) and, most importantly, a large majority of participants came from one country only (Germany). This shows that there is real interest in this question in some countries, but not everywhere in the EU. More specifically, the Committee considers that an on-line public consultation cannot substitute democratic consultation processes at all levels and at every legislative stage (before, during and after).
- 3.4 The Committee points out that the urgent procedure adopted by the Commission was criticised in some Member States, where citizens consider that the EU should have other urgent priorities (the economic crisis, unemployment, immigration, etc.), highlighting a possible problem in terms of the initiative's social acceptance. Moreover, some national governments do not yet have a clear position neither on repealing the current rules nor on which time to select (summer or winter), and do not view the issue as a priority.
- 3.5 Regarding the content, the Committee considers the idea of launching a debate on the subject to be interesting, but notes certain limitations in the Commission's current proposal that would justify extending the time for discussion in order to reach a broad consensus among all citizens and unanimity among the Member States:
- 3.5.1 The right to set the time is a national competence. According to the new proposal for a directive, the principle of subsidiarity means that each country is free to keep summer or winter time throughout the year. The risk is that if there is not unanimous time alignment by all countries, ensuring the same level of harmonised implementation as at present, the costs arising from different times between countries would have a serious impact on the internal market (fragmentation), generating more problems than benefits. The Commission recognises this problem in its impact assessment and the Committee considers necessary to achieve a wider consensus in advance, before the official presentation of the Commission proposal.

- 3.5.2 The Commission itself points out that the initiative is based on a series of studies carried out by various associations and Member States that are not conclusive or contradict each other. The Committee recommends starting a deeper impact assessment, involving all economic and social sectors, in every EU country in order to be able to understand which system is more adequate.
- 3.6 The technological adaptation of the systems on a global level has an obvious economic cost for businesses and governments and with a possible impact on people. In addition to this, a long period of ICT testing in advance is necessary in order to ensure its effective implementation.
- 3.7 Although the Commission introduces a mechanism to evaluate the directive's impact (in 2024), the Committee points out that the cost of changing time is quite high. For this reason, in the event of a negative impact assessment, it is not realistic to imagine a rapid reversal, due to the economic costs and the impact on the credibility of the European institutions.

Brussels, 17 October 2018

Luca JAHIER

The president of the European Economic and Social Committee

---