



LANDSFORENINGEN MOD SOMMERTID

Beder, Denmark, 15 August 2018

Comment on

Public Consultation on summertime arrangements

4 July 2018 - 16 August 2018

The Danish Association Against Summertime will like to add a few comments to the consultation.

First of all we will emphasize that any EU-regulation must be based on the benefits the regulation will bring as expressed in the Commission's COM(2010) 543: "Smart Regulation in the European Union". If there are no benefits, the regulation must be abandoned. In the joint meeting at the European Parliament on 24 March 2015 dr. Werner Vandendruwaene concluded that "The justification in terms of choice of legal basis, proportionality and subsidiarity is unconvincing". Thus summertime should be abandoned.

When summertime was instated in 1980 it was argued that it would result in energy savings. At the time it was a true statement. It resulted in a reduction of the energy consumption by a few percent. But since then the use of energy has changed, e.g. replacement of incandescent lamps and other energy saving measures. Thus the argument is no longer valid.

No other overwhelming and convincing arguments for summertime has been brought forward. Thus it should be abandoned.

In recent years it has been realized that summertime has a negativ effect on public health. In the above mentioned joint meeting a group of chronobiologists from the Ludwig-Maximilians-University Munich, Charité Berlin, the Universities of Würzburg, Basel, Zürich and Padova, Oxford University, Erasmus University Medical Center Rotterdam, INSERM Lyon, Semmelweis University Budapest, and the Czech Academy of Sciences presented evidence on the implications on our Biological Clock. They presented a long list of drawbacks. The critical issue is the change induced into the public twice a year when we have to wake up an hour earlier or an hour later.

The "social jetlag" induced in the spring is stressing our Biological Clock resulting in fatigue and thus loss of concentration, which results in negative traffic implications, reduced learning skills and lower efficiency in the work force. It has negative effects on health as well, e.g. resulting in an increase in the number of hearth attacks. In the autumn a study has shown an increase in the number of depressions as a result of the "sudden return of dark nights".

The chronobiologists estimates in the whitepaper from the above mentioned joint meeting "health and performance deficits that cost (directly and indirectly) 1% of the GNP, which could amount to 131 Billion EUR across the EU".

CET (Central European Time) UTC+1 is the proper time for Continental Europe as the westernmost parts of Europe with this timezone already is on "permanent summertime" and CEST (Central European Summer Time) as UTC+2 will result in "double summertime" for these countries. When Russia abolished the biannual change in 2011, they decided to stay on Moscow-summertime (UTC+4) by not changing the clocks in the autumn 2011. However the dark mornings experienced as a result of this decision lead to criticism, resulting in a change to proper Moscow time (UTC+3) on 26 October 2014. Turkey has likewise had the same reflections: They ended DST in 2016 thus using Turkey Time (UTC+3) permanently. Following this decision, they have had discussions on reverting the decision but the final decision was to abolish summertime.

These two examples from countries close to the EU shows that time is ripe for the Continental Europe to stay on CET all year round.

On behalf of Landsforeningen mod sommertid
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