

Joint industry position on Summertime Arrangements

Introduction

Airlines for Europe (A4E), Airlines International Representation in Europe (AIRE), the European Regions Airline Association (ERA) and the International Air Transport Association (IATA), and their respective members, are concerned about the proposal to abolish current DST changes switching from wintertime to summertime, and the timeline of the proposal, because it will have a **significant impact on the aviation industry and consumers at both European and global level**. We therefore urge the member states and European Parliament to consider the significant repercussions and disruption to passenger and freight connections when adopting their position. **A4E, AIRE, ERA, IATA and their members would prefer to remain with the current situation.**

Should the decision be to abolish time changes, the airline community's assessment and the required safeguards are as follows :

- **The least impact would be felt if summertime is maintained as the permanent time by all EU member states.** This follows a thorough analysis of the impact of the initial time change on each season.
- **Without complete synchronization of the final decision the aviation industry will be left in chaos.** In other words, if the proposal is eventually agreed, it is vital that the change is synchronized across the 28 EU member states.
- **The industry must have time to plan the changes to minimize disruption where possible, but the impact cannot be completely avoided.** Tickets go on sale up to a year in advance. The current European Commission plan to implement the change in 2019 is far too soon. **A4E, AIRE, ERA and IATA recommend that the earliest season the final clock change could take place is the start of the summer 2021 season (i.e. 28 March 2021).**

The impacts of such a decision on global aviation are profound. The following describes this in more detail.

The complexity of revising all airline schedules in Europe

- The aviation industry seasons (winter and summer) change on the same date European summer time changes. Although historical, this change of season is built-in to airlines business models, seasonal planning, fleet and crew planning and rostering, and schedules. Any change will have an impact at a global scale on air carriers operating within and to/from Europe.
- Airline schedules and slot planning are based on the same periods as European summer/winter changes over the whole of Europe. It is vital that any change to DST is synchronized across all European Union states. This minimizes disruption in the long term to passengers and minimizes the chance of confusion and missed flights. Asynchronous change in DST across Europe would be costly and complex for airlines to accommodate, given other regions and countries with alternate clock changes in place already.
- Europe remains the most congested area globally in terms of airport infrastructure, and therefore has 51% of all slot coordinated (level 3) airports worldwide: some 104 airports. Slot coordination requires all operators to hold a pre-allocated time of operation at these airports –

this 'slot' is defined by day and time. Any change to the summer/winter reference time in Europe will therefore impact whether the slots are held at the right time for operation.

- All arrival and departure flights at EU airports would need to be moved by 1 hour for either the summer or winter season change. The summer season is 10 weeks longer than winter, and is also the peak flying period - which means capacity is extremely congested. For this reason, as well as for the impacts which a change would have on night curfews, it would be preferable to remain on summer time permanently. However, this still requires immense rescheduling and planning to achieve.
- Many flights have allocated slots on both ends of the route, and for both intra-European and international routes this change is not a simple rescheduling. There would be two phases of disruption; a transition phase and the period thereafter.
- The changes could have a lesser impact and be a bit simpler to manage for intra-European flights, but they will be difficult for all international flights, *i.e.* departing or arriving from outside EU. At major EU airports in particular, given their extreme congestion, the (new) slots needed to permit the change are not readily available, because they are already occupied. Any difficulty in obtaining slot corresponding to the new arrival and departure times would cause problems on a country-to-country level.

The disruption to international connectivity

- Many airlines operate international routes in and out of Europe, that have been established over years of operation to ensure carefully fine-tuned networks and connectivity across the globe, which is to the benefit of passengers and shippers. The fine-tuning of the schedules relies on slot timings and availability, built through the historic slot principles ingrained in the EU Regulation 95/93 and the slot rules of third countries. Re-timing would affect these global networks and would require significant re-scheduling worldwide in order to preserve the coherence of these established networks. This process may take years due to lack of availability of the right airport slots, and in the interim schedules will remain sub-optimal. Furthermore, as long as DST is applied in other global markets, the schedules and connections will become asynchronous with significant impact for passengers and shippers, and for the economic viability of some routes.
- Changing a slot requires there to be a slot available, and when there are multiple airlines all seeking to change slots due to a DST move it becomes very complex. A slot not only reflects runway capacity, but terminal constraints as well, which further complicates availability, especially for international flights with their customs and border requirements.
- Flights between Europe and international destinations are frequent and timed to maximize connections, as well as serve the business day. Changes to the schedule disrupt connection banks of flights, and may be difficult to resolve due to curfews at many European hub airports, and those on the other end of the route.

For example, just the Europe - North American market is significant, with over 35,000 flights in the summer period of July and August this year to/from congested EU airports. Every single schedule would need to be reviewed for scheduling impact in the event of the elimination of seasonal time changes.

Operational restrictions further reduce schedule changes

- At airports with night curfews and night closures it is particularly difficult to move slots during the peak periods and night shoulder periods. For long haul operations many airlines operate on the limits of the curfews, and so it's imperative their slots can be realigned on the other end to still make the flight feasible. There are many major European airports with curfews and night bans.
- Airline schedules are not isolated between two city pairs. Instead, the schedule is built to efficiently use aircraft across carefully designed lines of flying to facilitate the airline's network, and so any change by an hour can disrupt not only one flight, but many. Moving a flight by even one hour in Europe reduces the turnaround time for that aircraft at its destination, which could have a knock-on impact across the whole schedule.
- Airlines that provide connectivity through hub airports, from one destination to another via an intermediary point, need to make sure the connections between flights are not lost with time changes.
 - Therefore airlines normally flex the slot on the other end of the route, and maintain the connection bank at their home base.
 - Even then it is not simple or straightforward, because connectivity comes from not just within the one airline's schedule, but ability to transfer passengers and freight between airlines and alliances at one hub.
 - The change in quality and quantity of connections offered would be costly for the industry and a disadvantage to the consumer
- The complexity of moving schedules for many airports due to a DST removal would be immense, and it's likely several flights or connections could not be accommodated at all, or at the preferred time, designed to meet the needs of the passenger, and build freight connections.

Safeguards in the event a decision is reached to abolish time changes

- Synchronization of all EU member states is essential, with ample consideration of and preparation time for the impact it will have on airline passengers and the industry as a whole.
- Coordination of airport slots and airline schedule finalization occurs in a specific timeframe ahead of each season. The summer season slots are coordinated from September the previous year, and the winter season slots from April the same year. However the planning for this coordination takes place months in advance of this period, and tickets go on sale from 330 days in advance of the flight. For instance, the coordination of the slots for next summer season (starting end March 2019) has already started in September 2018 and these slots will be allocated and confirmed in November 2018.
- Should a change be agreed it is essential a lengthy lead time, of at minimum 18 months in advance (reflecting the planning time necessary), is provided for the industry to have time to prepare and process the changes needed. This will serve to reduce the disruption but will not mitigate it. For this reason we would like to safeguard that in the event a time change is agreed, the first season it is applied in full would not be earlier than the start of the 2021 summer season (28 March 2021).



In conclusion, it should be recognized that changes to existing DST arrangements will affect the ability of the airline industry to meet consumer and business needs, at the busiest and most congested airports. The impact may be reduced where an appropriate lead time is introduced, but the impact will not be avoided. It is our recommendation that the status quo should remain. Should this not be possible, permanent summertime should be adopted from 2021 or later.