



Canada West Ski Areas Association
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July 16, 2019

Hon John Horgan, Premier of British Columbia
PO Box 9041 Stn Prov Govt
Victoria, BC
V8W 9E1

RE: Daylight Saving Time

Dear Premier Horgan,

The Canada West Ski Areas Association (CWSAA) is pleased to have the opportunity to respond to the B.C. Government's current consultation on Daylight Saving Time (DST). The consultation seeks to obtain feedback on the advisability of the province's continuation of the bi-annual time change and whether it is important to align B.C.'s time policy to that of neighbouring provinces, territories and states.

CWSAA Recommendations

1. Keep the status quo with time change.
2. If a change is warranted, adopt Standard Time (not Daylight Saving Time).

The reasons for these recommendations are outlined below:

On-Mountain Safety

It is significant that maintaining Daylight Saving Time (rather than Standard) only impacts winter months.

The proposed time change impacts outdoor workers in the winter more than any other group. Ski areas cite the safety of humans and wildlife as the key consideration if B.C. has an additional hour of darkness in the morning. Some aspects of start-up operations in the ski industry, avalanche control in particular, must be done in daylight to properly assess the risks to humans, wildlife and physical plant and infrastructure and to safely carry out this work. CWSAA anticipates there may be other outdoor industries as well that depend on natural light to assess risk management concerns and to safely commence daily operations. CWSAA asserts that safety must be the foremost consideration with any change to the province's time policy.

Visitor Experience

As a proxy for winter tourism activities in B.C., CWSAA members indicate that some operations would be delayed by one hour, and the a later morning opening would act as a competitive disadvantage compared to other ski destinations and negatively impact the \$1.7 billion dollar industry contributing to B.C.'s winter economy. As a rule, most skiers desire to get out on the mountain first thing in the morning and a move to Daylight Saving Time in the winter would shift this ski culture.

There are also unique considerations to the ski industry during winter months. These relate to less than ideal snow conditions (freeze/thaw) at certain times of the winter depending on daylight and operational hours. Retail and food and beverage revenues may also be impacted as activities are squeezed into a smaller window at the end of the day. This is because families and individuals that would otherwise linger at surrounding restaurant operations would be much more likely to head to their vehicle and get home, or back to their hotel. In some jurisdictions, a related concern with operations moving later into the day is that ski area traffic would converge with city/town rush hour traffic and add to already congested roadway systems.

Continent-wide alignment

CWSAA agrees with the Premier's comments that BC must consider other jurisdictions. Before any change is made, CWSAA encourages the Province take the lead to facilitate any change on a coordinated North American basis, not just west coast. In addition to north-south implications, there are as many or more implications on an east-west basis. In the government engagement materials and commentary, there is currently a lack of information on what is proposed for the eastern regions of B.C. currently on Mountain Time.

Impact of Darkness (not just time)

In addition to studies that have been conducted surrounding the impacts of a biennial time change, there are also scientific considerations around social and mental impacts of darkness for workers and residents. This is especially noteworthy depending on the location within a particular time zone. For example, the impact of morning darkness is greater in eastern and northern parts of the province compared to the lower mainland.

The question of whether to change clocks relates to both increased darkness during morning hours, as well as the impacts of adjusting time itself. While a shift to Daylight Saving Time in the winter will extend daylight at the end of the day, in many parts of the province it will eliminate the opportunity for morning daylight (eg: prior to a traditional work day). It is for this reason that CWSAA suggests if a decision is made to alleviate the need to adjust clocks, that Standard Time be considered.

There is concern that the fate of B.C. rests on California, a jurisdiction where the time change impacts will be felt the least due to its southern location.

The Canada West Ski Areas Association (CWSAA) is a not-for-profit trade association that represents the Ski Areas of Western Canada. Its primary areas of focus are safety and risk management, sustainable market growth, people and talent development, and government advocacy. CWSAA represents 264 Members, including 113 ski areas and 152 suppliers to the ski industry. Ski areas in Western Canada attract 9.5 million alpine skier visits, generate \$2.1 billion in spending annually, and employ 28,600 people (19,000 FTEs).

Sincerely,



Christopher Nicolson
CEO, Canada West Ski Areas Association

Copy to: citizenengagement@gov.bc.ca