

December 10, 2019

Honourable Nate Glubish, Minister of Service Alberta
103 Legislature Building
10800 – 97 Ave
Edmonton, Alberta T5K 2B6

Subject: Daylight Saving Time in Alberta

Dear Minister Glubish,

As the government concludes efforts to gather Albertans' thoughts on whether the province should continue to observe daylight saving time, the Banff & Lake Louise Hospitality Association (BLLHA) wishes to provide comment from the perspective of our Banff National Park accommodation, food and beverage and tourism sector membership. BLLHA also attaches to this letter an earlier submission on the topic of Bill 203, Alberta Standard Time Act.

Consistent with our earlier submission, BLLHA believes Alberta should maintain the status quo and continue with Mountain Standard Time and Mountain Daylight Saving Time.

Generally speaking, outdoor recreationalists desire to begin their day as early as possible to take advantage of Alberta's world class recreational opportunities, finishing activities by late afternoon/early evening so as to leave sufficient time to partake in leisurely dining, entertainment and retail activities.

When Bill 203 was under consideration by the former government, BLLHA heard that changes to the time standard would have dire consequences on some operators if they were forced to move the opening of operations to 10:00 a.m. (due to availability of light). While it could be argued that there is still the same amount of daylight hours; those daylight hours do not coincide with the behaviours of consumers of recreational experiences, thus putting recreational activity providers at a distinct competitive disadvantage amongst their North American counterparts.

Additionally, from a labour perspective, a business that operates based on daylight hours cannot simply shift hours of operation by an hour without severe effects on the ability to recruit individuals who align their workday with school and childcare hours. There is a tremendous trickle-down effect that must be acknowledged, in addition to the overall effect on Albertans and Alberta's economy.

BLLHA maintains that until such time that the province conducts a thorough economic impact study on what a change from the status quo might entail, there should be no deviation from the current practice. Such a study may prove beneficial, and timely, if neighbouring provinces and states proceed to make changes to align their respective time zones.

With respect to the survey instrument that the government used to receive input on this topic, we note there was not a category for 'tourism and hospitality'. While 'accommodation and food services' was identified as one grouping, we would offer that there is value to adding 'tourism and hospitality' as a more encompassing category for future engagement exercises to ensure that one of Alberta's strategic growth economies has been explicitly identified.

Thank you for the opportunity to participate in this consultation and please let me know if you have any questions on this submission, or, require any further details.

Sincerely,

A handwritten signature in black ink, appearing to read 'Darren Reeder', is placed on a light grey rectangular background.

Darren Reeder
Executive Director

CC: Jamie Mozeson, Chief of Staff Service Alberta