

# The Association of Drivers against Daytime Running Lights

Adrian Burrows  
DTLR Road and Vehicle Safety Division  
Vehicle Standards & Engineering Zone 2/04  
Great Minster House  
76 Marsham Street  
London SW1P 4DR

29 March 2005

Dear Mr. Burrows,

## Daytime Running Lights (DRL)

The last time we contact we had with the DTLR was a letter from Mike Lowe 14 Feb 2003. I understand from my associate Stephen Prower of the British Motorcyclists Federation, that you have taken over responsibility for the interesting subject of DRL.

It was interesting to note that Mike Lowe stated the government did not agree with 55watt DRL yet this seems top of the EU list simply because it's easy to implement on the existing parc. Also we believe the UK representative at the EU DRL meeting 28 November 2003 expressed concern for vulnerable roads users.

We believe it is dangerous to vulnerable road users and harmful to the environment thus we have formed an alliance to fight the spread of DRL. Because we hear that the EU intend to mandate DRL, we have been renewing our activities to warn people of the safety negative and environmental consequences of DRL and now have all the relevant reports listed on our website [www.dadrl.org.uk](http://www.dadrl.org.uk) "DRL Studies and Links".

On this page we are collating a growing body of evidence against DRL. Although we are forbidden from posting it on our website due to copyright laws, our USA organisation was given a copy of this confidential HILDI report by a "whistleblower" who works for a US insurance company. This confirms our view that the case for DRL is at best inconclusive and at worst dangerous – injuries increased by 3.7% after the introduction of DRL in the USA. The report has been suppressed in the USA because General Motors, having implemented a DRL system that is too glaring, stand to loose millions of dollars if the NHTSA decide to reduce DRL intensities.

The use headlights in good daylight will add about 1.85 million tonnes of CO<sup>2</sup> into the UK's atmosphere (annually the UK emits around 560 MtCO<sup>2</sup>). You may have seen the recent Carbon Trust TV adverts aimed at reducing the impact of climate change. Tom Delay Chief Executive, states that during 2003/2004 the Carbon Trust helped to save 0.9 to 1.8 million tonnes of CO<sup>2</sup>.

### **Daytime lights will negate all the good work of the Carbon Trust and put pedestrians, cyclists and motor cyclists at risk.**

We are sure that the Minister would not wish to be held publicly accountable for the energy waste and the negative safety effects on vulnerable road users attributable to DRL. We therefore would be most grateful if you could advise what the current policy of the UK Government is towards DRL. If the EU mandate DRL will the Government implement it or more preferably, in view of this new evidence ban DRL in the UK.?

We thank you for resisting pressure from the EU to adopt DRL and look forward to your response.

Yours sincerely,

**Roy Milnes UK Co-ordinator**

*The Association of Drivers against Daytime Running Lights*  
*The British Motorcyclists Federation*  
*The Motorcycle Action Group*  
*The Federation of European Motorcyclists Associations*  
*[Living Streets](#) – The UK Pedestrians Association*  
*Federation of European Pedestrians Associations*  
*Cyclists Associations*

[DADRL www.dadrl.org.uk](http://www.dadrl.org.uk)

[BMF](#)

[MAG](#)

[FEMA](#)

[FEPA](#)

Cc Tom Delay The Carbon Trust 9th Floor 3 Clements Inn London WC2A 2AZ

This letter is published at [www.dadrl.org.uk](http://www.dadrl.org.uk) "ACTION CENTRE".

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## Drivers Against Daytime Running Lights – UK

**Rt Hon Alistair Darling MP**  
Secretary of State for Transport  
Department for Transport,  
Eland House,  
Bressenden Place,  
LONDON SW1E 5DU

[alistair.darling@dft.gsi.gov.uk](mailto:alistair.darling@dft.gsi.gov.uk)

16 January 2003

### Daytime Running Lights (DRL)

Firstly, please let me congratulate you on reinstating some of the much need road infrastructure improvements this country badly needs to increase business efficiency and reduce pollution.

Secondly, your inclusion of hazard perception skills in the driving test is an excellent safety move. I believe that if half of the money currently spent on road paint and cameras was put into driver training with the requirement for every driver to take a more advanced test (including an eyesight test) every three years, you would halve the UK road accident rate.

Please could I draw you attention to the increasing dangers posed to vulnerable less conspicuous groups of road users by the use and abuse of daytime headlights. These reduce the ability of other drivers to perceive hazards. It is not people cocooned in padded metal boxes with multiple airbags who need protection but walkers, cyclists and motorcyclists who are far less visible to other drivers. According to DoT figures, it is these groups who are suffering an increase in KSI's despite a general reduction in accidents.

We believe DRL were introduced by the Swedish when they changed from driving on the left to the right and have kept them up as a marketing gimmick. There is no evidence to support extra safety. Studies claiming benefits have been proven to be flawed.

We are a group of experienced motorists concerned about the safety of all road users. We have the support of the British Motorcyclists Federation, the Cyclist Touring Club and the Pedestrians Association. As you may be aware, due to representations by the Federation of European Motorcyclists Associations (FEMA) to the EU vehicle manufacturers were prevented from introducing DRL in 2002.

In the past we have made representations to the DETR but the response is a negative sitting on the fence saying it is up to the EU. We approach the EU and they say it is up to member states. The EU is commissioning a new study but based on the NHTSA's performance in USA this may take years to conclude. General Motors introduced DRL in the USA in 1977. There is increasing anecdotal evidence from eye specialists that damage is occurring to drivers' eyes because of visual fatigue from DRL.

Would it be possible to request that expert ophthalmic opinions are included in the EU report?

President Bush and Prime Minister Blair are about to commit British lives for a war on Iraq of which oil supply is perceived to be a major factor. According to the Times (Tuesday 14 Jan) North sea oil is predicted to end by 2020. DRL waste oil. Generating electricity from a vehicle engine is extremely inefficient. For the USA, it is calculated that DRL will cost \$600 million dollars using 406 million gallons of fuel p.a. creating 33 million tones of carbon di-oxide pollution.

I believe you have the power to prevent or encourage the use of DRL in the UK. It is significant that the Grade 1 police drivers do not use DRL in the UK.

Please could we ask what you views are on DRL and if you can do anything about them?

Finally it is pleasing to note that the police are cracking down on abuse of illegal use of front and rear fog lamps (Telegraph Saturday 11 Jan 2003).

Yours faithfully,

**Roy Milnes UK Co-ordinator DADRL Drivers Against Daytime Running Lights**  
[www.dadrl.org.uk](http://www.dadrl.org.uk)  
[www.lightsout.org](http://www.lightsout.org)

Monday, 11 February 2002

alison.alleyne@dtlr.gov.uk

Alison,

Firstly let me thank you for your most detailed and informative letter of 24th January (only received on 9th February so please ignore my follow up letter of 03 February)

We were pleased to note the Department is aware and concerned about the effects of glare, if in the final analysis we could agree that side lights (when incorporated into head lamps) or the forthcoming electroluminescent panels as front bumpers are of sufficient intensity that would be a most excellent solution, however we appreciate the need to achieve conformity with the EU.

Neil Kinnock sent me a copy of the SWOV report and Jere Medlin sent me a copy of NHTSA 2000. May I ask if the UK sponsored Research Project you refer to is available in the Public Domain and if so would it be possible for us to have a copy?

Finally, I would like to send a copy of your letter to Stephen Prower of the BMF and our contacts in the USA, please would it be possible to have an email copy of your letter?

Many thanks for your response and the Department's consideration of drivers views on glare.

My regards to you

Roy Milnes

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## **Drivers Against Daytime Running Lights – UK**

**Mr Peter O'Reilly      Head of Branch  
DTLR Road and Vehicle Safety Division  
Vehicle Standards & Engineering  
Zone 2/04  
Great Minster House  
76 Marsham Street  
London  
SW1P 4DR**

**03 February 2002**

**Dear Mr. O'Reilly,**

### **Daytime Running Lights (DRL's)**

With reference to our letter of 6<sup>th</sup> December 200, In view of the EU parliament's decision not to permit DRLs, please may we enquire what the UK Government's official policy is regarding the use and abuse of vehicle lights?

We submit that by inaction on this issue, the UK Government is putting all less conspicuous more vulnerable road users at unnecessary risk and urge that a decision is made to regulate the misuse of distracting lights.

We look forward to you response.

**Yours sincerely,**

**Roy Milnes UK Co-ordinator DADRL Drivers Against Daytime Running Lights  
[www.lightsout.org](http://www.lightsout.org)**

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## Drivers Against Daytime Running Lights – UK

Mr Peter O'Reilly      Head of Branch  
DTLR Road and Vehicle Safety Division  
Vehicle Standards & Engineering  
Zone 2/04  
Great Minster House  
76 Marsham Street  
London  
SW1P 4DR

06 December 2001

Dear Mr. O'Reilly,

### Daytime Running Lights (DRL's)

We were most pleased to hear the Federation of European Motorcyclists' Association (FEMA) press announcement yesterday advising that the European Parliament is opposed to the introduction of motorcar DRL from 2002.

This is an excellent contribution to ensuring the safety of less conspicuous more vulnerable roads users. There is no evidence that DRLs reduce accidents. The indications seem to be that accidents are increasing to these groups. The NHTSA 2001 study was technically flawed and failed to consider pedestrians, cyclists and motorcyclists.

As a result of the European Parliament's decision we urge the UK Government to ban adverts and the import of vehicles with daytime headlights.

In the UK the misuse of glaring lights is increasing:

- Imported cars using full power low beam are allowed
- Many vehicles appear to have misaligned lights despite MOT checks
- Police ignore drivers using illegal front foglights in good daylight
- Some drivers think it legal to use high intensity rear lamps on motorways
- Manufacturers are permitted to show adverts of cars with lights blazing

All this detracts from the early perception of hazards essential to save motoring.

We do recognise that some form of lighting when mobile is of value and suggest that 5 watt lamps inbuilt into the headlamp reflector are adequate.

I quote according to Professor Murray Mackay:

*"The original concept of a daytime running light was (and still is) to have lights of about one tenth of the output of a dipped headlight".*

We believe that full power low beam headlights are a throwback to when Sweden decided to change to driving on the right and they have used it as a marketing gimmick since then as "safety sells".

For the future polyolfin based organic light emitting diodes (OLEDs) using electro-luminescent polymer films have been developed. These would be a clearer, glare free and thus safer form of vehicle illumination.

We understand that setting DRL policy is now up to the individual Governments.

In view of the EU decision, please may we enquire what the UK Government's official policy is regarding the use and abuse of vehicle lights?

**Yours sincerely,**

**Roy Milnes UK Co-ordinator DADRL Drivers Against Daytime Running Lights**  
**[www.lightsout.org](http://www.lightsout.org)**

Subj:	<b>Re: Pedestrian Protection - consultation</b>
Date:	10/10/2001 12:14:21 GMT Daylight Time
From:	<i>Bheena.Natarajan@dtlr.gsi.gov.uk (Bheena Natarajan)</i>
To:	<i>RoyMilnes@aol.com</i>

Dear Mr Milnes

PEDESTRIAN PROTECTION: CONSULTATION DOCUMENT

Thank you for your e-mail of 9th October in response to the above consultation exercise. Your comments will be carefully considered together with others received.

Yours sincerely

Ms Bheena Natarajan  
VSE 6  
Zone 2/06  
Great Minster House

020 7944 2085  
GTN: 3533 2085

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# Drivers Against Daytime Running Lights – UK

Mr Peter O'Reilly            Head of Branch  
DTLR Road and Vehicle Safety Division  
Vehicle Standards & Engineering  
Zone 2/04  
Great Minster House  
76 Marsham Street  
London  
SW1P 4DR

09 October 2001

Dear Mr. O'Reilly,

## **Pedestrian Protection - Consultation Daytime Running Lights (DRL's)**

We have been forwarded a copy of your letter of 30th August 2000 by the British Motorcyclists Federation and would be grateful if you would consider including our views within your consultation process.

We are a group of experienced motorists with members both in the UK and USA and are concerned on the recent proposals by ACEA to adopt Daytime Running Lights (DRLs) from 2002 as supposed pedestrian protection measure.

We believe that DRLs are inappropriate in the high traffic densities in the UK. Less conspicuous, more vulnerable road users such as pedestrians, cyclists and motorcyclists will be put at risk due to visual fatigue caused by DRLs to other drivers.

May we itemise some perceived dangers:

### **1. Dangers from DRL's**

DRL's momentarily distract oncoming drivers attention from observing fine, but vital road safety detail essential for safe defensive driving, due to the eye being temporarily "masked".

This can lead to a driver missing safety critical information such as:-

- A child,
- A cyclist,
- A pedestrian,
- An equestrian,
- A motorcyclist,
- Feet under vehicles,
- Traffic signs and lights,
- A slippery road surface,
- A ball rolling into the road,
- A small animal darting out,
- A car door about to be opened,
- Front direction indicators masked,
- Vision of vehicles behind obliterated,
- Following drivers can be less responsive to brake lights.

Advanced motorists and Police drivers are trained to adopt safe defensive driving methods and to observe these small but vital signs as accident avoidance techniques. It is significant that some enlightened Volvo owners, the AA, the RAC and all UK police forces do not use daytime headlights. Currently most UK drivers prefer not to use DRL's.

### **2. Inaction by Government**

The inconsiderate, incompetent and inexperienced drivers who misguidedly use DRLs will eventually force other drivers (even those like our group who consider DRLs a danger), to have to use headlights as a defensive measure. We submit that if all vehicles use DRL's, it will be a retrograde step, putting all less conspicuous road users at risk.

We urge the Government to ban the use of DRLs in the UK.

**3. One eyed monsters**

Current technology does not exist to allow the continued use of full power DRL's, on a trip to Scotland I counted twelve Volvo's with one headlight out - imagine an overtaking driver mistaking one of these for a motorcycle. According to Phillips Lighting, the standard life of a H1 tungsten halogen lamp is 225 hours and only 150 hours for the 55watt dipped beam of a H4 lamp. This means at an average speed of 40mph, new lamps can be required on average from 6000 to 9000 miles – this is less than the service interval on most new cars.

**4. Dazzle**

More daytime journeys are made with vehicles heavily loaded, some vehicles have misaligned headlights (or they adjust them to a higher setting, due to misleading adverts by Ford and Volvo some drivers think it legal to use fog lights in good daylight and some drivers appear to use high beam to save dip beam lamps.

The new xenon HD discharge headlights have a particularly intense and distracting beam.

We submit full power headlamps are not suitable for DRL's. I have just witnessed a large 4WD vehicle with headlights and illegal foglights ablaze on the M6 in a traffic jam!!

**5. Obscuration of traffic cameras**

Use of DRL's may make it more difficult for the new SVDD forward facing cameras to read front number plates.

**6. Obscuration of mirrors**

Having a vehicle with DRL's in your rear view mirror limits a driver's rearward view making it difficult to observe distant vehicles, motor cycles and pedal cyclists etc. Evidence from the USA indicates drivers turn their mirrors out of alignment - another reason why DRL's violate the spirit of the UK Highway code.

**7. False sense of security**

DRL's can give drivers a false sense of security encouraging drivers to barge along with less courtesy and less consideration for others.

**8. Headlamp signals**

Whilst the Highway Code discourages headlamp flashing as a means of thanks or warning, it happens. DRL's inhibit this courtesy.

**9. Pollution**

Generating electricity from a vehicle engine is inefficient - most energy is lost as heat. Widespread use of DRL's will increase pollution and counter the Government's commitment to the Kyoto greenhouse gas reduction target.

**10. Research**

Enclosed are two technical paper prepared by the British Motorcycle Federation which counter the safety projections claimed in the various European and USA studies. The conclusion is that there is no benefit from DRLs.

**11. A compromise solution?**

As most vehicles have 5watt side lights built into the headlamp reflector giving a wide spread of luminance, would not the use of front side lights (not rear lights which detract from brake lights) be a more reasonable and acceptable solution? Long life filaments could easily be developed for these lamps as light output is not critical and no extra costs would be incurred by manufacturers.

In conclusion we urge the UK government to oppose the adoption of DRLs and ban the use in the UK to protect more vulnerable less conspicuous road users such as pedestrians. The Federation of European Motorcyclists (FEMA), the European Cyclists Federation (ECF) and the International Pedestrians Association (IPF), The British Motorcycle Federation (BMF), The Motorcycle Action Group (MAG) have issued a statement expressing concern at the proposed introduction of DRLs.

Please would you add DADRL representing drivers to this list and please make the contents of this letter public.

**Yours sincerely,**

**Roy Milnes UK Co-ordinator DADRL Drivers Against Daytime Running Lights**  
**[www.lightsout.org](http://www.lightsout.org)**

cc by email to Ms. B. Natarajan [bheena.natarajan@dtlr.gsi.gov.uk](mailto:bheena.natarajan@dtlr.gsi.gov.uk)

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# Drivers Against Daytime Running Lights – UK

Mr Neil J Bowerman      Senior Engineer  
DETR Road and Vehicle Safety Division  
Vehicle Standards & Engineering  
Zone 204/B  
Great Minster House  
76 Marsham Street  
London  
SW1P 4DR

ref vse4061/6

18 August 1999

Dear Mr. Bowerman,

## Daytime Running Lights (DRL's)

Thankyou for your detailed letter of 29th July 1999, please may we formally raise some points in response for your consideration:-

### 11. Inaction by Government

By inaction at this crucial stage, the Government is allowing DRL's to become adopted in the UK without proper consideration of the dangers caused by visual fatigue to drivers on our crowded roads.

The inconsiderate, incompetent and inexperienced drivers currently using DRL's will force other drivers who consider DRL's a danger, to have to use them as a defensive measure. We submit that if all vehicles use DRL's, it will be a retrograde step, putting all less conspicuous road users such as pedestrians, cyclists, motorcyclists and children at risk. Accidents will increase due to visual fatigue.

### 12. Dangers from DRL's

DRL's momentarily distract oncoming drivers attention from observing fine, but vital road safety detail essential for safe defensive driving, due to the eye being temporarily "masked".

This can lead to a driver missing safety critical information such as:-

- A child,
- A cyclist,
- A pedestrian,
- An equestrian,
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- Feet under vehicles,
- Traffic signs and lights,
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- Front direction indicators masked,
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- Following drivers can be less responsive to brake lights.

Advanced motorists and Police drivers are trained to safe defensive driving methods to observe these small but vital signs as accident avoidance techniques. It is significant that some enlightened Volvo owners, the AA, the RAC and all UK police forces do not use daytime headlights. Currently most UK drivers prefer not to use DRL's.

### 13. EU position

The EU Transport Commission (Gert van Koopman) have advised us that the decision regarding the use of DRL's is up to national governments.

**14. One eyed monsters**

The technology does not exist to allow the continued use of full power DRL's, on a recent trip to Scotland I counted twelve Volvo's with one headlight out - imagine an overtaking driver mistaking one of these for a motorcycle. According to Phillips Lighting, the standard life of a H1 tungsten halogen lamp is 225 hours and only 150 hours for the 55watt dipped beam of a H4 lamp. This means at an average speed of 40mph, new lamps can be required on average from 6000 to 9000 miles – this is less than the service interval on some cars.

**15. Dazzle**

More daytime journeys are made with vehicles heavily loaded, some vehicles have misaligned headlights (or they adjust them to a higher setting, due to misleading adverts by Ford and Volvo some drivers think it legal to use fog lights in good daylight and some drivers appear to use high beam to save dip beam lamps. The new xenon HD discharge headlights have a particularly intense and distracting beam. We submit full power headlamps are not suitable for DRL's.

**16. Obscuration of traffic cameras**

Use of DRL's may make it more difficult for the new SVDD forward facing cameras to read front number plates.

**17. Obscuration of mirrors**

Having a vehicle with DRL's in your rear view mirror limits a drivers rearward view making it difficult to observe distant vehicles, motor cycles and pedal cyclists etc. Evidence from the USA indicates drivers turn their mirrors out of alignment - another reason why DRL's violate the spirit of the UK Highway code.

**18. False sense of security**

DRL's can give drivers a false sense of security encouraging drivers to barge along with less courtesy and less consideration for others.

**19. Headlamp signals**

Whilst the highway code discourages headlamp flashing as a means of thanks or warning, it happens. DRL's inhibit this courtesy.

**20. Research**

Enclosed is a technical paper prepared by the British Motorcycle Federation which counters the safety projections claimed in the various European studies.

**21. Pollution**

Generating electricity from a vehicle engine is inefficient - most energy is lost as heat. Widespread use of DRL's will increase pollution and counter the Government's commitment to the Kyoto greenhouse gas reduction target.

**In conclusion,**

We submit that the UK Government should urgently decide within the next month for or against DRL's otherwise citizens could be put at risk.

**To allow a minority to use DRL's creates confusion and danger, this is not acceptable. Either all vehicles in the UK should use DRL's or as has happened in Italy and Australia they should be banned.**

As most vehicles have 5watt side lights built into the headlamp reflector giving a wide spread of luminance, would not the use of front side lights (not rear lights which detract from brake lights) be a more reasonable and acceptable solution? Long life filaments could easily be developed for these lamps as light output is not critical and no extra costs would be incurred by manufacturers.

**Yours sincerely,**

**Roy Milnes UK Co-ordinator DADRL Drivers Against Daytime Running Lights**

DETR  
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29 July 1999

Mr Roy Milnes 8 Millers Meadow Rainow Macclesfield Cheshire SK10 5UE  
Dear Mr Milnes

Daytime Dunning Lamps (DRLS)

I refer to your letter dated 2 July 1999 addressed to Mr Dean Dyer, which follows on from your earlier correspondence. I have been asked to reply and may I start by apologising for the delay in providing a substantive reply to your earlier letters. Nonetheless, I will try to address as many of the issues as is possible in this reply.

The UK requirements concerning the installation and use of lights on vehicles are contained in The Road Vehicles Lighting Regulations 1989, as amended (RVLR). These Regulations permit, but do not mandate, the use of DRLS. At the present time there are no plans to bring forward proposals to amend these requirements with regard to the provisions covering DRLS, mainly because of the uncertainty of the course that should be taken.

In your letter you state that the use of DRLs is a 'violation of the 1999 Highway Code', referring in particular to Rules 94, 201 and 21.1. The latter two of these rules only concern the correct use of fog lamps, and as such are not pertinent to the issue of DRLS. Rule 94, though, is more pertinent, being a general requirement concerning the use of lights so as not to cause dazzle or discomfort to other road users.

However, it will be a matter of subjective opinion whether DRLs cause dazzle. I should mention that enforcement of the requirements of the lighting regulations is the responsibility of the police. Only the courts can give an authoritative interpretation of the Regulations, and that interpretation may be dependent upon the particular circumstances.

Generally, the issue of DRLs is one of the more exacting vehicle lighting issue that currently concerns the Department because of the various claims and counter-claims concerning their benefits or dis-benefits. Indeed, much of the evidence produced is either confounding, unsubstantiated or emotive and as such it is unclear what the true benefit (or otherwise) of DRLs truly is.

The European Commission is currently considering the various issues concerning the potential benefits of DRLS, and we await the outcome of their deliberations with interest.

Whilst the vast body of evidence would appear to suggest that the universal use of DRLs could offer significant overall road safety benefits, the UK is concerned that this may be at the expense of vulnerable road users and the environment. Most studies, though, have not produced sufficient data to be able to verify the effect the use of DRLs on vulnerable road users.

As regards the general issue of accident rates between the UK and Sweden, it is too simplistic to say that, because the rates are similar between the two countries, DRLs have proven ineffective in Sweden. Differences (or even similarities) in road safety statistics are dependent upon many more factors than simply the use of one type of lamp.

As regards the issue of glare or dazzle to other road users, most vehicles which operate DRLs do so by employing the dipped beam headlamp, which is designed not to be dazzling to other road users at night-time, and should therefore be even less dazzling during the daytime. Clearly if DRLs were to be required then careful consideration would need to be given as to how that function would be achieved, as this may not only lead to an increase in glare but also, as you suggest, a significant increase in the amount of pollution being released into the atmosphere.

Finally, we have no evidence to suggest that DRLs are being used as a marketing ploy by any manufacturers, or that they have been implicated in any incidences of road rage.

I hope you find this information helpful.  
Yours sincerely,  
Neil J Bowerman  
Senior Engineer

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# Drivers Against Daytime Running Lights – UK

Mr Dean Dyer  
DETR Road and Vehicle Safety Division  
Vehicle Standards & Engineering  
Zone 204/B  
Great Minster House  
76 Marsham Street  
London  
SW1P 4DR

ref vse4061/6

2 July 1999

Dear Mr. Dyer

## Daytime Running Lights (DRL's)

Following my letters of 28<sup>th</sup> December 1998 and 15<sup>th</sup> April 1999 requesting advice of what the DETR's position is regarding DRL's, please may I raise another area where DRL's cause problems in the UK.

This is violation of the 1999 Highway code (items in capitals are mandatory) :-

### Rule 201

You MUST use headlights when visibility is seriously reduced, generally when you cannot see for more than 100 metres. You also may use front or rear fog lights (in addition to headlights) **but you MUST switch them off when visibility improves** (see rule 211).

### Rule 201

You MUST use headlights when visibility is seriously reduced, generally when you cannot see for more than 100 metres. You also may use front or rear fog lights (in addition to headlights) **but you MUST switch them off when visibility improves** (see rule 211).

### Rule 211

You MUST NOT use front or rear fog lights unless visibility is seriously reduced (see rule 201) as they dazzle other road users and can obscure your brake lights. You MUST switch them off when visibility improves.

### Rule 94

You MUST NOT

- Use any lights in a way which would dazzle or discomfort to other road users.
- Use front or rear fog lights unless visibility is seriously reduced.
- You MUST switch them off when visibility improves to avoid dazzling other road users.

Other rules which DRL's violate:-

### Rule 180

The most vulnerable road users are pedestrians, cyclists, motorcyclists and horse riders. It is particularly important to be aware of children, elderly and disabled people and learner and inexperienced drivers and riders.

**Rule 183** Particularly vulnerable pedestrians .....etc. [DRL's put all less conspicuous road users at risk]

**Rule 125** Be considerate ...etc. [DRL's are not]

**Rule 126** Safe Driving needs concentration....etc. [hard to concentrate when blinded by DRL's]

There is no proof that DRL's are safer, accident rate remain similar between the UK and Sweden. We have put the above points to Gerry Keaney Volvo's MD and they have no answer. It is evident that Volvo are simply using DRL's as a marketing tool. It may be safer for Carl and Olga to tank along cocooned in air bags etc with headlights ablaze barging others out of the way in Sweden, but in the more densely populated UK, the distraction of DRL's cause a danger to other road users.

It is clear that the DETR is allowing Volvo UK to violate the spirit (if not the letter) of the UK Highway code and putting all less conspicuous road users at risk.

Please could you let us know why the DETR is allowing these dangerous imports and what the UK's official policy on DRL's is?

Yours sincerely,

**Roy Milnes UK Co-ordinator DADR Drivers Against Daytime Running Lights**

Attached

Press Release Sketches showing examples of danger

cc Press release circulation list

Subj: Running Lamps " Not Protectively Marked "  
Date: 13/04/99 10:35:02 GMT Daylight Time  
From: Dean\_Dyer@detr.gsi.gov.uk (Dean Dyer)  
To: roy.milnes@aol.com

Mr Milnes,

Just to let you know, following your letters on daytime running lamps, I haven't forgotten about you and I will provide a full reply shortly. Our expert on lighting matters has been extremely busy lately and has been abroad on business a lot of this time. Nevertheless, I will get his advice on your points and hopefully reply within the next 14 days.

Thank you for being patient.

DEAN DYER  
Vehicle Standards & Engineering  
Department of Environment, Transport & the Regions  
\*\*\*\*\*  
Department of the Environment, Transport & Regions

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This email does not constitute a commitment by DETR.  
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## Drivers Against Daytime Running Lights – UK

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DETR Road and Vehicle Safety Division  
Vehicle Standards & Engineering  
Zone 204/B  
Great Minster House  
76 Marsham Street  
London  
SW1P 4DR

ref vse4061/6

15 April 1999

Dear Miss Alleyne

### Daytime Running Lights (DRL's)

I thank you for your letter of 05 February 1999 promising a substantive reply to my letter of 28<sup>th</sup> December requesting advice of what the DETR's position is regarding DRL's. In the meantime some more evidence of an increase in accidents has come to light in the USA since DRL's were adopted and other countries such as Israel, Australia and the Netherlands have abandoned them.

It is more than a safety issue. DRL's incite road rage and in themselves can be considered a form of road rage.

You have to ask the question: "Does it help safety?"

The answer is that there is no data that proves that this is so. It is only speculation that it is a safety help. Calling something safety doesn't make it safety. Re-examination of the evidence in the often quoted and exaggerated daytime headlight studies show that the improvements are estimates and projections.

Of the five major automobile daytime headlight studies, none favoured daytime headlights, but did show an increase in rear-end collisions. This information is from the British Motorcycle Federation. The Canadian data was taken during a time when United States accident figures dropped by a similar amount. EU road accident figures show that there are more fatalities per million miles in Sweden (where DRL's were conceived) than in the UK.

DRL's are NOT an innocuous little something that has no effect on other drivers.

The next question to ask is: "Do daytime headlights have safety-negative qualities?"

The answer is yes. US figures show an INCREASE in the accident rate for cars before and after the adoption of DRL's. With more DRL's, courtesy on the highway is down and road rage is up. Just blindly assuming that more visibility equates to safety is not a solution to better safety. Two government sponsored independent studies in Australia found DRL's "to have no discernible safety benefit". As a consequence Australia repealed their motorcycle "lights on" law. Israel also dropped their use of DRL's after they found an increase in accidents. In the Netherlands the government were prevented from introducing DRL's by a group of cyclists.

One does not need reams of charts and specifications to know that all DRL's distract, annoy, and reduce safety. What has happened to common sense? So a vehicle can be seen 1 or 2 miles down the road with DRL's, just think about what that does to the overall view that the driver has to contend with. The human eye has a very large latitude of vision reception when not subjected to lights shining into them.

DRL's are a flawed concept making all less conspicuous road users extremely vulnerable.

**Imagine a company car, taxi or HGV driver at the end of a long shift about to pass your child walking or cycling along - when a Volvo lumbers into view with distracting headlights - who is the most vulnerable?**

It is significant that some Volvo owners, the AA, the RAC and all UK police forces do not use daytime lights.

In reality Volvo and Saab are using DRL's in the UK simply to draw attention to their cars as a marketing scam in the guise of safety whilst endangering all other less conspicuous road users.

The EU have advised me (Gert-Jan Koopman who works for the Transport Commission) that it is up to each government to determine their policy on DRL's. Please could you let me know what the UK's official policy on DRL's is?

Yours sincerely,

Roy Milnes

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## **Drivers Against Daytime Running Lights – UK**

**Mr. Dean Dyer  
DETR Road and Vehicle Safety Division  
Vehicle Standards & Engineering  
Zone 204/B  
Great Minster House  
76 Marsham Street  
London  
SW1P 4DR**

ref vse4061/6

27 March, 2005

Dear Mr. Dyer,

### **Daytime Running Lights (DRL's)**

You may recall that we corresponded during April regarding the merits/ dangers of DRL's in the UK.

Since then, there is growing support to ban the use of DRL's in the UK due to the dangerous glare putting less conspicuous road users at risk from drivers suffering from visual fatigue. This view is supported by members of the Association of British Drivers, The British Motorcycle Federation and The Ramblers.

Due to these dangers, the USA NHTSA have issued a ruling that full power DRL's are to be banned in the USA (49 CFR571.108 docket No. NHTSA 98-4124).

On behalf of the above organisations, please may I submit a request for the DETR to propose that a similar ruling is adopted in the UK.

**Yours sincerely,**

**Roy Milnes**

**enclosed  
copy letter to Gerry Kersey MD Volvo UK  
copy Volvo Cars - A danger at any speed**

cc

Mr. John Prescott Deputy Prime Minister  
Department of the Environment  
Great Minster House  
76 Marsham Street  
London  
SW1P 4DR

# Drivers Against Daytime Running Lights – UK

Mr. Dean Dyer  
DETR Road and Vehicle Safety Division  
Vehicle Standards & Engineering  
Zone 204/B  
Great Minster House  
76 Marsham Street  
London  
SW1P 4DR

14 April 1998

Dear Mr. Dyer

## Use of headlights in daytime

I am most grateful for your informative reply on 03/04/98 to my letter of 5<sup>th</sup> March 1998, I did not appreciate the amount of research that has been undertaken into this subject.

Whilst I understand discussion has yet to take place to allow the European commission to make a decision, you mention that the UK has commissioned an independent assessment of the SWOV report, please would it be possible to be informed of what the conclusion of the SWOV and UK reports was.

Yours sincerely,