



The Association of Drivers against
Daytime Running Lights
www.dadrl.org.uk

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Dear Mr. Byrne,

Daytime Running Lights (DRL) Consultation

Please may we contribute to your DRL consultation which outlines the RSA intent to make DRL mandatory.

In theory DRL may appear to be beneficial as the simple view is "people can see me coming"

But please consider the effect of glare, distraction and dazzle upon other driver's eyes. I am sure as experienced motorists in the RSA you appreciate the need to perceive the essential fine details in a traffic scenario to enhance your safety and that of those around you, particularly vulnerable road users.

I am sure you also know the EU / UNECE WP29 have sanctioned blinding 1200cd DRL (normal dipped headlights have to be no brighter than 800cd). In 2010 when life safety is at stake it is criminal that motor manufacturers (condoned by the EU and UNECE) are vying with each other to outdo each other with brighter an brighter lights under the guise of safety.

The principle of Daytime Running Lights conflicts with the successful experiments to remove visual clutter from streets. DRL draw attention to vehicles consequently vulnerable, less conspicuous road users such as pedestrians and cyclists can be lost in a sea of visual clutter¹.

DRL were found necessary when Sweden changed from driving on the left in 1967; as safety sells they are used as a marketing gimmick analogous the Hans Christian Anderson fable of The Emperors New Clothes".

In your consultation document you claim DRL will save 15% of multiparty accidents; however these claims are based upon studies used by the EU that used flawed methodology.

Simply if DRL are of benefit, ask the EU to produce real evidence from published road safety statistics, you will find they cannot – not even for Sweden.

In reality where we can measure the effects of DRL you will see that accidents have INCREASED particularly to vulnerable road users. Yes, DRL may save a few crumpled wings on vehicles with drivers cocooned in air bag cushioned steel safety cages, but what is this compared to the life of a child?

In reality:

- **EU:** No EU country can prove any reduction in accidents or fatalities when DRL were mandated
- **Austria:** Accidents **increased by 12.2%** - Austrian Government banned obligatory DRL Jan 2008
- **Bulgaria:** DRL used 4 months per year - accidents have **increased by 8.1%** (Appendix 1)
- **Poland:** Since DRL introduced April 2007 accidents **increased by 6.0%** (Appendix 1)
- **USA:** When DRL were introduced in 1997 by GM, accidents **increased by 3.7%** (HILDI 1997)
- **USA:** NHTSA 2008 concludes "no statistically significant associations" (from DRL)

¹ Hans Monderman, Head of Road Safety for the northern provinces of the Netherlands removed signs and road markings related to traffic from Drachten, Makkinga and Oosterwolde also Christiansfeld in Denmark and Latton UK removed visual clutter resulting in less accidents.

The UNECE and EU legislators have based their recommendations upon theoretical academic reports predicting a reduction in vehicle accidents. However these reports are fundamentally flawed and use meta-analysis (i.e. reports upon previous reports) to compound the errors. Crucially, only laboratory simulation using slides was utilised as a foundation for the EU-DRL regulation.

We accept that there are times when lights in daytime are valuable, but not the blinding light levels sanctioned by the EU. The Japanese Government conducted real-world test (as opposed to slides in a laboratory) and suggested a more sensible limit of 200cd.

It is sheer madness to equip vehicles with super-bright LED lamps (which are mini lasers operating near the eye damaging ultra-violet end of the spectrum) to try to combat the power of the sun to blind other drivers and then expect less accidents.

The lives of Ireland's pedestrians, cyclist and motorcyclists are at risk: it is only a matter of time before lawyers latch onto the carnage the EU has already caused and start suing Transport Ministers personally.

Having spent two excellent holidays touring Ireland it seems the RSA are more pro-active than other EU countries, please can I appeal to you at least to seek expert Ophthalmological opinion before sanctioning DRL as the EU have not. When Austria did so, their government banned lethal Daytime Running Lights.

Yours sincerely,

Roy Milnes

Campaign Co-ordinator DaDRL for and on behalf of:

[The British Motorcyclists Federation](#)

[The Motorcycle Action Group](#)

[The Federation of European Motorcyclists Associations](#)

[Write to Ride Northern Ireland](#)

[Living Streets – The UK Pedestrians Association](#)

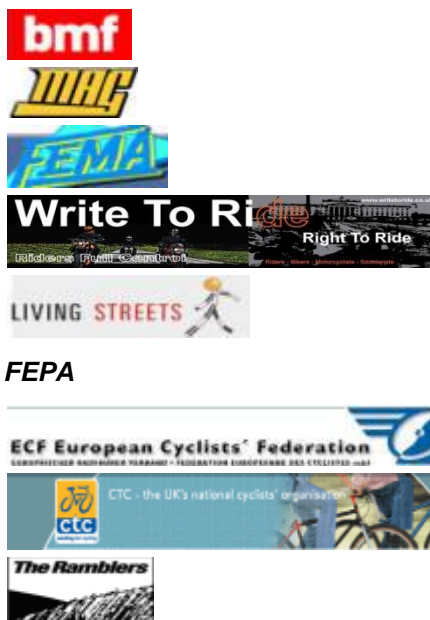
[Federation of European Pedestrians Associations](#)

[European Cyclists' Federation](#)

[CTC the national cyclists' organisation](#)

[The Ramblers Association](#)

[Blinded by Xenon - campaign against night-time glare](#)



www.blindedbixenon.co.uk

cc Minister for Transport, Mr. Noel Dempsey TD getintouch@noeldempsey.ie

cc Irish Times newsdesk@irishtimes.com

References

DaDRL responses to the EU's consultation in 2006 at www.dadrl.org.uk/DRLstudies.html

Inattentional blindness http://www.scholarpedia.org/article/Inattentional_blindness

Simons DJ, Rensink RA. Trends Cogn Sci. Change blindness: past, present, and future. 2005 Jan;9(1):16-20. Comment in: Trends Cogn Sci. 2005 May;9(5):218; author reply 219.

United Nation Declaration of Human Rights 1948 www.un.org/en/documents/udhr/

Highway Loss and Data Institute USA 1997 www.dadrl.org.uk/DRLstudies.html

NHTSA September 2008 The Effectiveness of Daytime Running Lights for Passenger Vehicles www.dadrl.org.uk/DRLstudies.html

Motorcycle Action Group UK - Response to the Consultation 'Saving Lives with DRL' Hardy Phd www.dadrl.org.uk/DRLstudies.html

Critique of the Methodology of IR2: DRL - How data is misused and duplicated Hardy MAG www.dadrl.org.uk/DRLstudies.html

Comment from the BBC:

So do we have to equip school children with headlamps and car batteries in their satchels?

Roger Harrobin Environmental Correspondent BBC

"Daytime running lights are yet another measure that seeks to promote the safety of those in cars to the detriment of those outside them. They make all road users without lights relatively less conspicuous and therefore put them at greater risk."

Professor John Adams, Ph.D. (University College London)

Daytime Running Lights (DRL) imply violations against:

- The convention concerning the power of Authority
- The Law in respect of the protection of Infants (1969)
- The Obligation of Protection
- The Principle of Equality
- Declaration of Human Rights (1948) Article Three
- The Laws of Logic
- Public Ethics and Morals

Attorney-at-Law Dr. Gerald G. Sander, M.A., Mag.rer.publ., Stuttgart, Germany

Appendix 1 – The Evidence against Lethal Daytime Running Lights

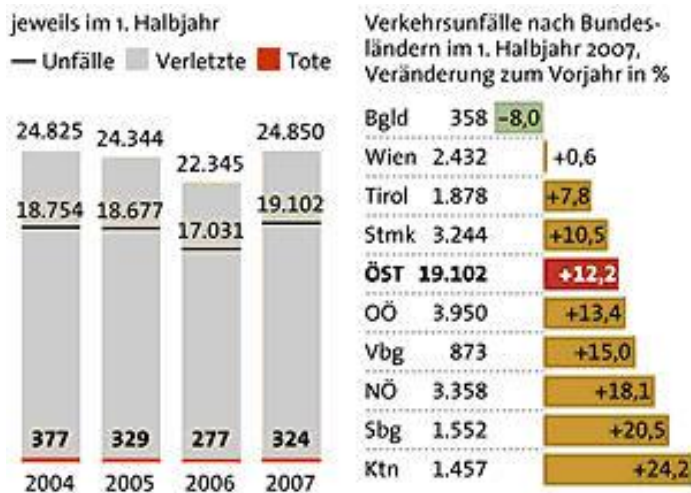
The Netherlands Research Institute SWOV issued a Factsheet Daytime Running Lights August 2008 www.swov.nl/rapport/Factsheets/UK/FS_DRL.pdf which summarised previous EU funded DRL studies.

This SWOV Factsheet claims a theoretical 15% reduction in fatal crashes and 10% reduction in injury crashes and was used to persuade the European Parliament to vote in a DRL law in September 2008.

Clearly and tragically the EU's theory that DRL save lives is flawed:

AUSTRIA:

Increase in accidents since the introduction of Lethal Daytime Running Lights:



The overall increase in accidents for Austria due to DRL is +12.2%

24,850 injured +11%
324 subjects died +17%
(OST = Osterreich)

Note:
There was a disproportionate increase in accidents to vulnerable road users since the introduction of DRL in 2007:

Key
Tote = deaths
Verletzte = injuries
Unfälle = accidents

The chart side bars are Austrian states

Children +13%
Cyclists 2,814 accidents + 43 %
Motorcyclists 1,400 accidents + 46%
Fatalities + 51%

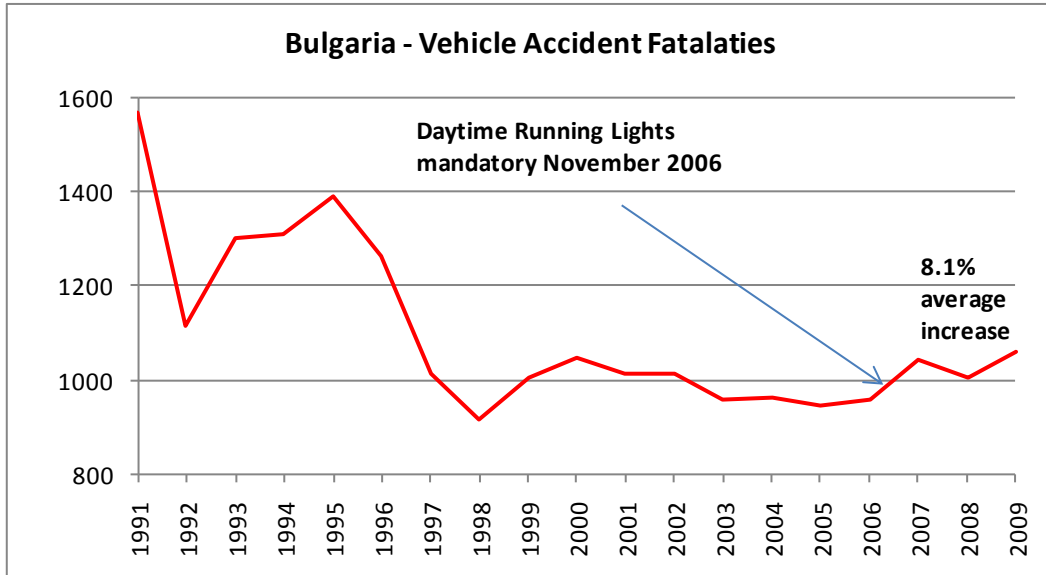
Since DRL were banned by the Austrian Parliament on 1st January 2008, fatalities have fallen by 5% and bike accidents by 25%.

This is despite many vehicles from adjacent countries e.g. Audi's and BMW's from Germany entering Austria with excessively bright DRL

All data in this Appendix is from official Government Transport Department or Police sources

BULGARIA:

Increase in accidents since the introduction of Lethal Daytime Running Lights for 4 months each year from November 2006:

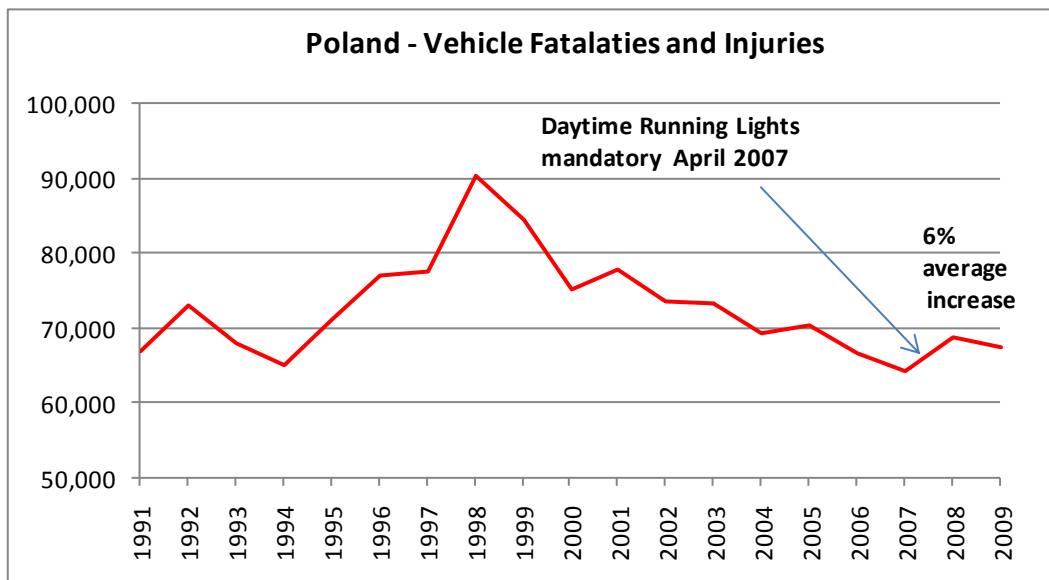


Data Source: Bulgarian Police

http://dokpbdp.mvr.bg/NR/rdonlyres/CA8ABA4D-44B5-44A3-ACE4-05134F300D73/0/U1990_2008_bg.xls

POLAND:

Increase in accidents since the introduction of Lethal Daytime Running Lights April 17 2007



Data Source: Polish Police

www.policja.pl/porta/po/8/160/Wypadki_drogowe_w_latach_1985_2008.html