



**Chairman** Tom d'Hollander, Belgium (Flanders)  
**Honorary Treasurer** Ole Thorson, Spain (Catalonia)  
**Secretary** Terence Bendixson, United Kingdom

*Please reply to:*

**Terence Bendixson, 39 Elm Park Gardens, London SW10 9QF, United Kingdom**  
**Tel 44 (0) 20 7352 3885** [t.bendixson@pobox.com](mailto:t.bendixson@pobox.com)

The European Commission  
DG for Energy and Transport  
Road Safety Unit  
'DRL'  
[TREN-E3-CONSULTATION@cec.eu.int](mailto:TREN-E3-CONSULTATION@cec.eu.int)  
Fax 322 296 5196

16 November 2006

Dear Sir or Madam

**DAYTIME RUNNING LIGHTS (DRL)**

Thank you for inviting FEPA to comment on the Commission's proposal to introduce daytime running lights on vehicles throughout the European Union. FEPA is the umbrella organisation for European non-profit organisations that campaign to improve conditions for pedestrians. FEPA has member organisations in Sweden, Denmark, Germany, Belgium, France, Switzerland, Italy, Spain and the United Kingdom.

FEPA represents the interests of people on foot in towns, cities, suburbs and villages. We put importance on safety but we regard it equally important that European streets, squares and other urban places are designed to cater for people of all ages as they walk, meet, talk and otherwise spend time. The design of few streets responds to such human needs. All too often the requirements of drivers of vehicles are given priority. As a result pedestrians face fear-inducing motor traffic, distracting vehicle lights and dazzling head lights.

***General***

Pedestrian protection has been on the agenda of the European Commission for several years. The main goal is to get motor manufacturers to design the fronts of vehicles to reduce the injuries inflicted on pedestrians involved in collisions. While important work has been done in establishing design criteria, the application of this knowledge still seems as far off as ever. In this context, DRL can be seen as a proposal of dubious effectiveness designed to distract attention from failure to protect people on foot via the more onerous action of modifying car fronts.

Furthermore daylight running lights, instead of being about drivers taking care not to harm pedestrians, would oblige those on foot to look out for cars. This has wide ranging implications. It could lead underwriters to refuse to pay damages to pedestrians involved in collisions with cars. It could cause drivers to watch less carefully for pedestrians. And, if recent Austrian findings apply generally, it could result in added pedestrian casualties and deaths. (See below.)



It is accordingly a matter of the greatest disappointment to FEPA that the European Commission is making so little progress towards reducing the aggressive of vehicles towards pedestrians and towards roads that are safe and comfortable for walking.

### ***Sea of lights***

The introduction of DRL would require pedestrians, when seeking crossing gaps or other indicators of safe conditions, to have to stare at 'seas of lights'. Motor cycles could become masked by cars. Bicycles could become less easy to detect – and so on. Unless convincing research evidence can be produced by the European Commission that DRL will increase safety for pedestrians, we urge the abandonment of this proposal.

### ***Research***

Research findings do not support the case for DRL. Only one large scale before and after assessment of the effect of DRL has been undertaken. This impartial American study, done for the insurance industry, covered over one million vehicles and found a 3.7% increase in injuries following the introduction of DRL in the United States. (HILDI 1997)

New findings from University of Vienna point in the same unsatisfactory direction. Dr Peter Heilig MD ([peter.heilig@univie.ac.at](mailto:peter.heilig@univie.ac.at)) reports that since the experimental introduction of DRL in Austria collisions with children, particularly on crossings, have increased.

No research results that the Commission can quote point convincingly in a direction favourable to DRL. Much is made of cost-benefit analysis by Elvik et al (2003) but there is wide agreement that it does not meet the standards of proof normal in medical or road safety research.

### ***Motor cycles***

Current practice on motor cycle visibility varies from country to country. In some motorcyclists are obliged to use headlights by day to increase the ease with which they, as small vehicles, may be seen. This is clearly of benefit to pedestrians. The introduction of DRL would reduce the conspicuousness of motorcycles and, in some cases, cause the headlights of motorcycles that are preceding cars to appear to be one of the headlights of the car. This could lead pedestrians in 'read' the road incorrectly and so increase pedestrian casualties.

### ***Road safety overall***

How would DRLs affect pedestrian safety? As the only research into this relationship that the Commission can supply is the inadequate work of Elvik et al (2003), FEPA is unable to quantify the extent to which DRL's would reduce or increase pedestrian casualties. The Commission is in the same position. In the absence of such knowledge FEPA believes it would be irresponsible for the Commission to introduce DRLs.

### ***Energy***

FEPA, like many charitable and commercial organisations, is concerned about the prospect of climate change and therefore intent on seeing reduced CO2 emissions in Europe. DRLs, due to their energy requirements, would cause fuel consumption to increase – eventually across the entire European vehicle fleet. FEPA considers that any safety regulation that would lead to such an increase is unacceptable. Given today's awareness of the risks of climate change, DRL is an obsolete concept. Road safety is important and measures to reduce road casualties are needed.



However it is essential to choose measures that would save lives and reduce energy consumption and emissions.

### *Subsidiarity*

The Commission's DRL consultation paper notes that 14 Member States already require DRL. It also says that: 'The benefits of DRL are...likely to be greater at latitudes further away from the Equator than at latitudes close to the Equator'. As is well-known, it was northern, Scandinavian countries that pioneered DRLs and, even now, such lights are more widely used in the north of Europe than the south. No stronger case could be made for the subsidiarity rule to be applied to DRL. FEPA believes that no convincing case has been made for installing DRL all over Europe and that their introduction should be, as now, left to Member States.

### *Pedestrian protection and energy saving*

Perhaps the most disappointing aspect of the Consultation Paper on DRLs is the narrowness of its approach. Walking has connections to both road safety and the quality of life. Of course the roads of Europe need to be made safer for people on foot but, in countless cases, they need too their role as corridors for vehicular movement needs to be made less dominant.

Bypasses can help achieve this objective in some cases but are only part of the answer. Vehicles and driver behaviour need changing too. At present cars are, on average, too heavy, too powerful, too noisy and too fast for use in urban and suburban conditions. And their headlights, which consume energy unnecessarily, are designed to enable fast, rural, night-time driving. For pedestrians they are dazzling by day and night.

The Commission's efforts to increase road safety should address these issues. Reduced engine power, reduced speeds and changes to driver behaviour coupled with new Light Emitting Diode (LED) pedestrian-friendly lighting solutions should be tested.

### *Conclusions*

**FEPA considers that the pan-European introduction of DRL would be a backwards step. Pedestrian safety needs to be pursued by actions that would make drivers more aware of pedestrians and by changing to the design of vehicle fronts that would make them more yielding in the event of collisions with pedestrians.**

**Bearing in mind increasing concern about the effect of CO2 emissions on climate change, only measures that would increase pedestrian safety *and* reduce fuel consumption should be considered.**

Yours faithfully

Terence Bendixson  
Secretary  
FEPA  
44 (0)20 7352 3885