

From: Adrian Burrows [Adrian.Burrows@dft.gsi.gov.uk]

Sent: 29 November 2006 16:13

To: dadrl

Subject: RE: Daytime Running Lights

A summary of our response to the commission's consultation is:

- Based on research carried out for us by TRL the Commission have overestimated the potential reductions in serious and fatal accidents. When more realistic assumptions are made, the cost benefit analysis does not support the introduction of DRLs
- Further research is required before we can be certain that motorcycle conspicuity will not be adversely affected by DRLs on motor cars.
- Requiring existing vehicles to use dipped beam headlights during the day would result in significant increases in vehicle emissions, up to 1.5% for CO2 and fuel consumption, and will undo much of our proposed savings under the RenewableTransport Fuel Obligation.
- There is a range of national issues –seasonal light conditions (eg Nordic states having longer winters and much longer nights during those winters), road safety concerns, different local habits (eg. different school hours), etc - and we believe it should be for each Government to reach a conclusion on whether deployment of DRLs would have a positive or negative effect on the overall road safety strategy of each country.
- In addition the current draft regulatory measure from the UN-ECE that will require new vehicles to be fitted with dedicated DRLs is inadequate as it does not include automatic switching to ensure DRLs are deactivated under low ambient lighting conditions (when they are most likely to dazzle other drivers) and there are no requirements to include a switch to enable drivers to deactivate the system when the vehicle is being used in a member state that does not mandate the use of DRLs.

In the UK we have an excellent safety record which has been achieved through a variety of measures however, we have a particular concern about the safety of vulnerable road users, i.e. motorcyclists, pedestrians and cyclists. We must ensure that any measure that could further jeopardise the safety of these groups is only introduced on the basis of compelling evidence.

Further info can be found in TRL's report available at:

http://www.dft.gov.uk/stellent/groups/dft_control/documents/contentservertemplate/dft_index.hcst?n=17378&=3

Best regards,

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