



## **Saving Lives with Daytime Running Lights (DRL)**

### **Commission Consultative Paper**

**ETRA and ECF Comments**

**Submitted to the Commission on 17 November 2006**

- The European Twowheel Retailers' Association (ETRA) is the European professional association for independent bicycle, moped and motorcycle retailers. ETRA represents some 5,000 companies, which employ approximately 11,500 people, in Belgium, Denmark, France, Germany, Great-Britain, Holland and Sweden.  
The European Cyclists' Federation (ECF) currently represents 48 national cyclists' associations from 36 countries. As a result, ECF groups at European level some half a million cyclists.
- ETRA and ECF welcome the opportunity to comment on the Commission's idea about a European-wide introduction of DRL on all motorized vehicles. We have read the Commission's Consultative Paper "Saving Lives with Daytime Running Lights (DRL)" attentively. **We oppose to the general introduction of DRL for the following reasons.**
- In our view, the paper does not contain sufficient scientific evidence that a European-wide legal obligation for all motorised vehicles to use DRL will considerably improve road safety for cyclists and PTW riders.
- The paper is mainly based on the 2003 TNO study "*Daytime Running Lights*" – *Final Report*, which concludes that "*the use of DRL reduces the number of multi-party daytime accidents for cars between 5 and 15%*". For this one study, leading to a positive conclusion, there are a quite a number of other studies with a negative conclusion. This is being extensively argued with references to several other studies in the position paper FEMA has submitted to the Commission in the framework of this consultation.
- In September 2001, ECF, FEMA, the European motorcyclists' association and FEVR, the European federation for road victims, presented to the Commission a position paper, which contained an overview analysis of the scientific evidence available on DRL. That analysis clearly showed that, in spite of well over 50 DRL studies carried out over 30 years, it was impossible to achieve a reliable measurement of the effect of DRL on road safety. The TNO study on which the Commission has based its position paper shows exactly the same shortcoming.
- The study concludes from the examination of "*various sources in the effects of DRL*" that "**it is likely that DRL has a favourable effect on accidents involving pedestrians, cyclists and motorcyclists**". To this the Commission adds: "*Contrary to widespread fears, the fact that cars are using DRL does not seem to diminish the effect of any motorcyclist's DRL. There have been numerous experiments under laboratory conditions and field experiments which corroborate these findings.*" However, the Commission fails to mention any reference to these experiments. Moreover, the effects of DRL on motorcyclists' conspicuity has not been examined in the TNO research.
- Another element that is lacking in the TNO study is the examination of the effects of DRL on car drivers' behaviour to vulnerable road users and motorcyclists. We believe that general use of DRL may well reinforce the already strong position of four-wheeled vehicles in traffic, giving a psychological right of way to car drivers when pulling out in front of vulnerable road users. In our view, this effect needs thorough research before imposing DRL throughout the Union.
- In our opinion other traffic aspects are far more important than DRL for improving road safety. A few years ago, the FEVR has pointed out that speed, alcohol use and protection of vulnerable road users are the top priority issues that need to be addressed to reduce road accidents.
- In the framework of the European Road Safety Action Programme, the Commission has listed the following order of causes of mortality on the road : excessive speed (15,000 fatalities), consumption of alcohol or drugs, fatigue (10,000 fatalities), non-wearing of seat belts or of protective helmets (7,000 fatalities). It does not seem logical that the Commission shows great interest in harmonising legislation on DRL, but does not see any need for harmonizing for instance speed limits or blood alcohol limits.

- It has also been proven beyond any reasonable doubt that human behaviour is the cause of many road accidents. Therefore, we believe that additional training of motorized vehicle drivers to improve their awareness of vulnerable road users so that they adapt their behaviour, is imperative. Nevertheless, the current review of the Drivers Licences' Directive passes this over completely.
- The Commission admits that general use of DRL will increase fuel consumption and CO<sup>2</sup>-emissions. At a time when the need for tackling climate change is becoming inevitable, no measure that results in more pollution should be taken unless it shows irrefutable benefits in other areas. That is not the case for the general use of DRL.
- **In view of the above argumentation, ETRA and ECF ask the Commission to leave the issue of DRL to the member states and to focus on other, much more pressing and important road safety issues such as reducing the overall speed and the volume of motorised traffic and tackling the problem of drinking/using drugs and driving.**