



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

**Mr. Stuart Kerr Managing Director
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02 October 2007

Dear Mr. Kerr,

Volvo Cars - a Danger at any Speed? Daytime Running Lights

We thank you for your letter of 21 September, please may we respond with facts and figures in the accompanying letter.

The summary is:

- ❖ The industry has known about increased injuries from DRL and a solution since 1997
- ❖ The academic studies to justify DRL have been shown to use flawed methodology
- ❖ Daytime Running Lights are a marketing gimmick
- ❖ Daytime Running Lights are polluting the planet
- ❖ The real – world accident increases to vulnerable road users are tragic
- ❖ There is widespread and expert and political support for a ban on Daytime Running Lights

In view of the new statistics, Volvo have an excellent opportunity to appear pro-active, could 10 watt front sidelights be the answer? We are confident that with widespread political and academic support and collectively with over one million members, that we can persuade the UK government to institute a headlight DRL ban.

The BMF and the CTC have already commenced their campaign (CTC Newsnet: 28 September 2007) and we have formally asked Ruth Kelly the Transport Secretary of State for a DRL ban.

In view of the appended information we do hope that you will reconsider your decision.

**Yours sincerely,
Roy Milnes
Campaign Co-ordinator DaDRL for and on behalf of:**

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

European Cyclists' Federation

Cyclists Touring Club

The Royal Society for the Prevention of Cruelty to Animals

The Ramblers Association



FEPA





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Page 1 of 2

02 October 2007

Dear Mr. Kerr,

Volvo Cars - a Danger at any Speed? Daytime Running Lights (DRL)

We thank you for your letter of 21 September, albeit with a disappointing response, please may we respond with some facts and figures.

Firstly, may we differentiate between headlight DRL as used by Volvo and the low power non-glaring lamps proposed by Hella and Philips in 1997.

As little as 6 watts of lamp power ¹ (or LED equivalent) can be used to produce an effective, wide-angle, long-distance, non-glaring DRL that does not interfere with the vehicle's directional signals, does not encourage improper use of the vehicle's primary lights after dark, and has a long time between failures.

There is no objection to low power, non glaring DRL switched on only when the light level falls below 100lux, the effect upon fuel economy would be minimal and they would provide potential gains in safety.

Secondly, may we make a number of other points:

1. Expecting DRL to compete with the power of the sun or high ambient light levels of 40,000 to 50,000 lux (the CIBSE recommendation for reading is 300 lux), will create a 'visually aggressive environment' to other road users, including other drivers, to the general aggravation of the difficulties of the driving task, and to the general detriment of road safety.
2. It is the glare and distraction of headlight based DRL that is the problem. Whilst they may be appropriate for sparsely populated Scandinavian countries, in the densely occupied UK (and most other European states) and at a time when Governments are actively encouraging people to walk and cycle, headlight based DRL mask vulnerable road users and cause increased accidents.
3. When Bulgarian officials expected a decrease in accidents from daytime running lights, their 2006/07 experiment tragically recorded increases (please see appendix 1).
4. The Austrian 2006/07 DRL experiment (appendix 1) was associated with a 12.2% increase in accidents, the overall toll was 24,850 injured (+11%) and 324 subjects died (+17%).

Significantly, there was a disproportionate increase to vulnerable road users:

| | |
|----------------------|---|
| Children | +13% |
| Cyclists | 2,814 accidents + 43 % |
| Motorcyclists | 1,400 accidents + 46% fatalities + 51% |

5. Whilst DRL may save a few crumpled car bumpers for air bag cocooned occupants in a steel safety cage, I think you must agree that the consequence of less visibility of pedestrians, cyclists and motorcyclists to other drivers are infinitely more serious.

6. Expert ophthalmic is forming solidly against DRL, the recent publication of ophthalmic evidence by Professor Dr. Peter Heilig University of Vienna includes topics on:-

Change blindness, Inattentive Blindness, Sustained Inattentive Blindness, Motion Induced Blindness (as demonstrated by Michal Bach's computer simulation), Repetitive Blindness Overload, Disability Glare, Capacitive problems of cognitive processes and Exceeding Critical Intensities of Stimulation.
(please see Appendix 2 for more details).

¹ Twin 6 watt (H6W) bulbs 12 system watts, which is insignificant for fuel consumption purposes, see Weigelt, B.; Rienaeker, H. 1997. "Daytime running lamps with low power consumption", Hella KG Hueck and Company, Lippstadt (Germany)/ Philips Lighting. 5 p. New Concepts in International Automotive Lighting Technology, Warrendale, SAE, 1997, p.161-167. Report No. SAE 970908. UMTRI-89973 A14 - this DRL is commercialized as Hella 2PT 008 362-801

7. The current trend of manufacturers to focus upon bigger and brighter headlamps in the name of driving safety is folly. The HID metal halide lamps which emit a high proportion of light at the eye damaging blue short wave end of the spectrum add another undesired component.
8. Extremely bright blue-white light sources cause prolonged retinal recovery times due to light 'stress' which is increasingly longer with higher age traffic participants.
9. Authorities are now recognising the safety benefits of removing street signs to reduce the clutter of visual distractions a motorist has to deal with and so aid the perception of real hazards. It is acting at cross-purposes at the same time to continue the clutter of Volvo daytime running lights.'
10. The collective success of submissions by our alliance to the EC DRL consultation last November has persuaded Dr. Stefan Tostmann, European Commission, Head of Road Safety Unit, DG TREN not to proceed with headlight based DRL. We understand that the UNECE WP29 group are now working on a solution with dedicated low power DRL plus an automatic switch between dedicated headlights/dipped-beam headlights, however we will be lobbying for switched low power DRL.
11. The academic research you rely upon has been shown by our experts to use flawed methodology and has been discredited – see www.dadrl.org/studies. The actual real-world results verify that the studies were too optimistic (please see Appendix 3 for comments).
12. The motor industry has known since the publication of HILDI 1997 bulletin 15 (appendix 1) that headlight DRL are associated with increased accidents (3.7% average) which the 2007 Austrian and Bulgarian statistics plus expert medical opinion verify. Those promulgating headlight DRL may be deemed inapposite.
13. Environmental pollution has not been addressed: if the UK was made to adopt Volvo types of DRL they would negate most of the carbon savings achieved by the 1,874 wind turbines installed in the UK.

To conclude, surely you would agree that based upon the Austrian and Bulgarian experience; the HILDI finding; and the Japanese Government's ban² it is morally wrong for a manufacturer to introduce a so called "safety measure" which is associated with injuries and deaths to vulnerable road users and is a violation of their public Obligation of Protection, Equality Principle, and Human Rights.

In view of the real-world evidence about the dangers of Daytime Running Lights, we would have hoped that an environmentally conscious and socially caring company would be keen of it's own accord to stop using DRL and recall existing vehicles to protect the UK's vulnerable road users.

Due to the declination of Volvo (and ACEA³), we shall use our collective electoral power to lobby our representatives and the media for a DRL ban similar to that achieved in Japan and proposed by Austria.

**Yours sincerely,
Roy Milnes
Campaign Co-ordinator DaDRL for and on behalf of:**

- 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*
- European Cyclists' Federation*
- CTC, the national cyclists' organisation*
- The Royal Society for the Prevention of Cruelty to Animals*
- The Ramblers Association*

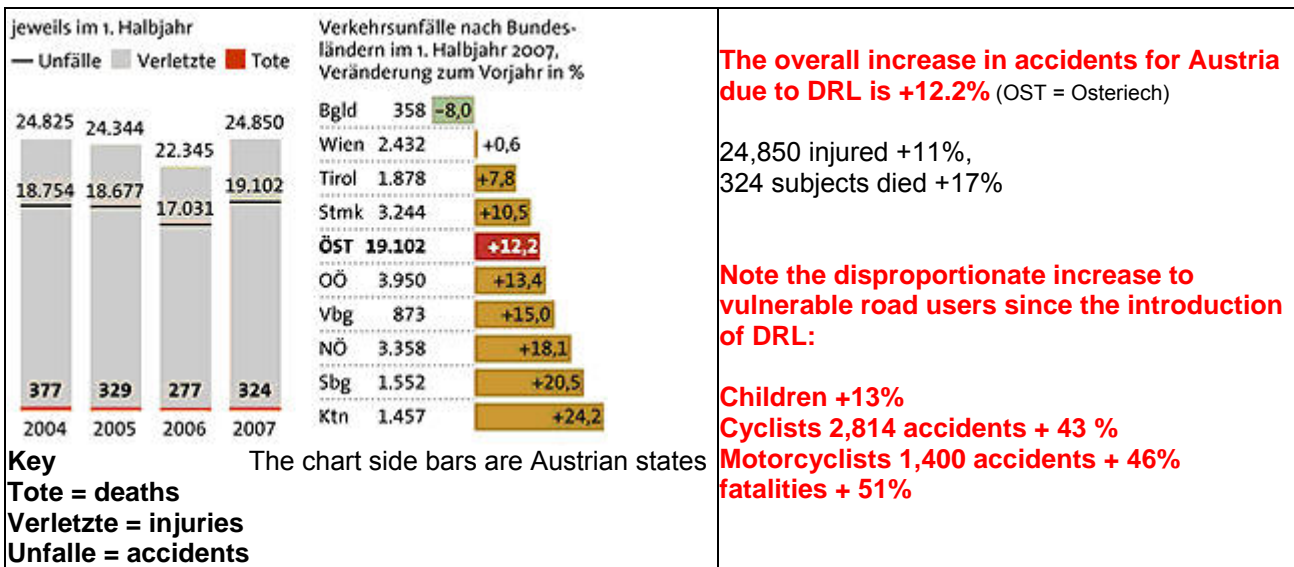


² In Japan, DRLs (400 cd or more in central luminous intensity) equivalent to the requirement of ECE R87 are prohibited.' Ref: JASIC 2003 <http://www.unece.org/trans/doc/2004/wp29gre/gtr5-6e.pdf> Working Paper No. GRE-gtr-5-6 (5th GRE-gtr informal meeting, Ottawa, 7-11 June 2004)

³ Association des Constructeurs Européens d'Automobiles = Association of European Automobile Manufacturers

Appendix 1 Increased accidents caused by Daytime Running Lights

AUSTRIA 2007 Statistics increase in accidents since the introduction of Daytime Running Lights:



Data sources:

http://www.statistik.at/web_de/wcmsprod/groups/r/documents/schnellb/025994.pdf
http://www1.polizei-nrw.de/im/stepone/data/downloads/64/02/00/verkehrsunfallstatistik_2007_1hj.pdf
<http://www.kfv.at/fileadmin/Publikationen/Verkehrsunfallstatistiken/2006/VUS2006.pdf>
<http://www.bmvit.gv.at/verkehr/strasse/sicherheit/fahrenlicht.html>

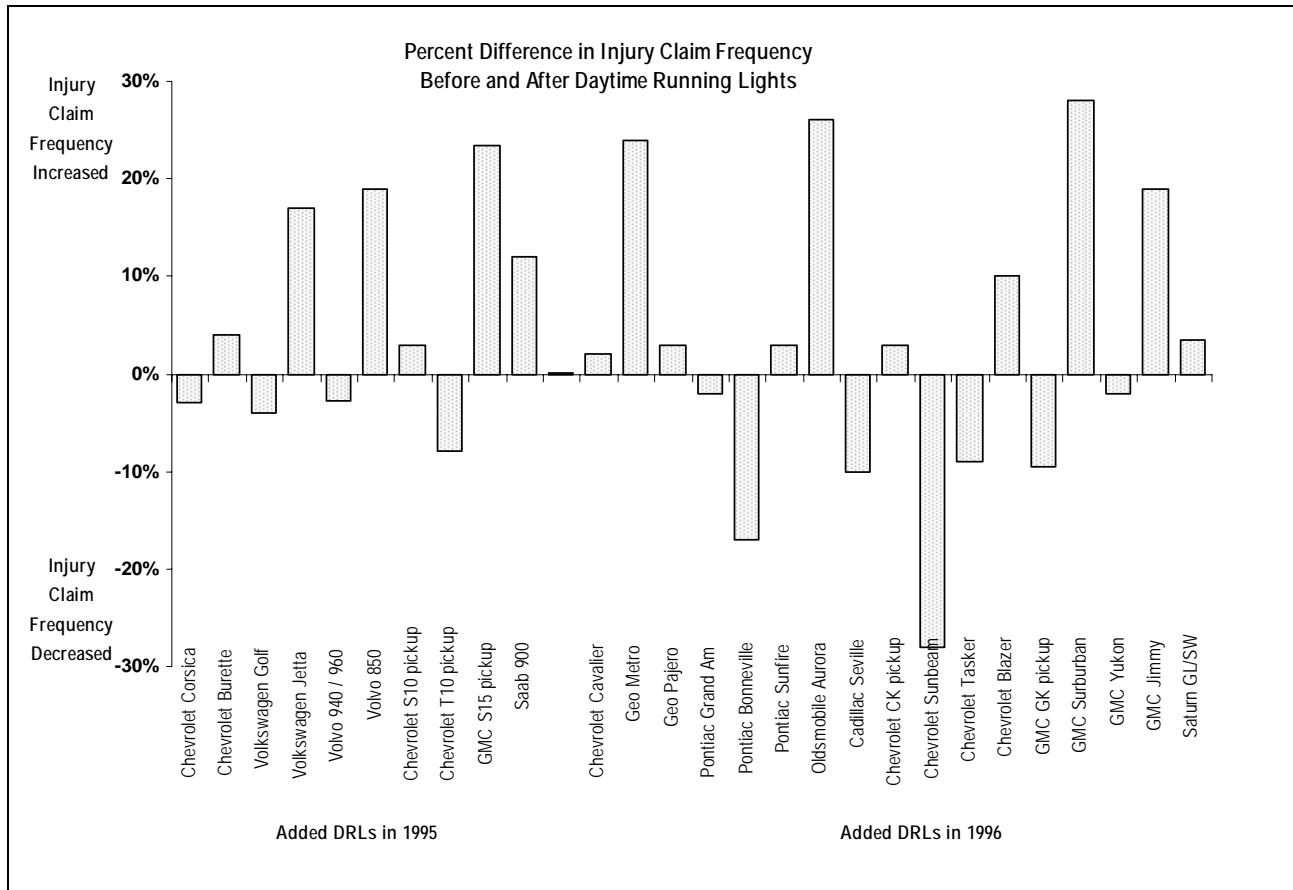
Bulgaria 2006/07 Accident data showing the increase in red when DRL were introduced during wintertime:

| | I | II | III | IV | V | VI | VII | VIII | IX | X | XI | XII | |
|-------------|-----------------|-----------------|----------|----------|----------|----------|-----------|----------|-----------|----------|-----------------|-----------------|-------------------------|
| 1990 | 84 | 90 | 101 | 134 | 152 | 146 | 171 | 177 | 167 | 129 | 105 | 111 | 1567 |
| 1991 | 48 | 46 | 70 | 68 | 74 | 86 | 116 | 112 | 128 | 125 | 130 | 111 | 1114 |
| 1992 | 88 | 76 | 73 | 69 | 85 | 109 | 127 | 150 | 139 | 149 | 113 | 121 | 1299 |
| 1993 | 91 | 69 | 55 | 115 | 104 | 116 | 141 | 137 | 135 | 134 | 99 | 111 | 1307 |
| 1994 | 106 | 91 | 116 | 93 | 120 | 99 | 110 | 153 | 148 | 125 | 117 | 112 | 1390 |
| 1995 | 58 | 65 | 77 | 90 | 97 | 114 | 124 | 149 | 132 | 152 | 103 | 103 | 1264 |
| 1996 | 83 | 41 | 62 | 70 | 79 | 84 | 108 | 103 | 121 | 99 | 85 | 79 | 1014 |
| 1997 | 71 | 47 | 47 | 38 | 73 | 82 | 100 | 90 | 110 | 90 | 83 | 84 | 915 |
| 1998 | 72 | 60 | 52 | 66 | 96 | 84 | 108 | 142 | 74 | 95 | 68 | 86 | 1003 |
| 1999 | 60 | 59 | 76 | 66 | 103 | 89 | 125 | 114 | 86 | 83 | 88 | 98 | 1047 |
| 2000 | 39 | 62 | 59 | 83 | 77 | 76 | 90 | 96 | 114 | 112 | 101 | 103 | 1012 |
| 2001 | 72 | 56 | 69 | 70 | 86 | 96 | 105 | 115 | 80 | 98 | 102 | 62 | 1011 |
| 2002 | 44 | 53 | 63 | 82 | 82 | 77 | 87 | 99 | 77 | 116 | 91 | 88 | 959 |
| 2003 | 63 | 38 | 67 | 64 | 68 | 84 | 99 | 109 | 103 | 110 | 74 | 81 | 960 |
| 2004 | 57 | 61 | 57 | 61 | 80 | 88 | 104 | 96 | 73 | 93 | 94 | 79 | 943 |
| 2005 | 70 | 51 | 73 | 62 | 65 | 81 | 90 | 106 | 87 | 113 | 80 | 79 | 957 |
| 2006 | 45 +4 | 67 +4 | 50 +4 | 71 +4 | 82 +4 | 84 +4 | 108 +4 | 98 +4 | 109 +4 | 89 +4 | 93 +4 DRL | 94 +4 DRL | 1038 (990+48) DRL |
| 2007 | 85 +? DRL | 53 +? DRL | 61 +? | 72 +? | 87 +? | 83 +? | 85 +? | 86 +? | | | | | |

Data sources www.FIA.com and <http://dadrl.hit.bg>

Appendix 1 Increased accidents caused by Daytime Running Lights - continued

Extract from USA Highway Loss Data Institute (HILDI) Bulletin Vol 15 Dec 1997 :



HILDI 1997 was the first real-world study analysing 750,000 accidents before and after the introduction of Daytime Running Lights in the USA in 1996 and 1996 by General Motors and some European manufacturers.

The average increase in injuries to occupants of DRL equipped vehicles was 3.7%.

Examples:

Volvo 850 +19%
Volvo 940/960 -2.8%
Saab 900 +12%

Footnote:

DRL in the form of bright 18 watt parking lights were adopted by the Swedish nation when they changed from driving on the left hand side of the road to the right in 1967.

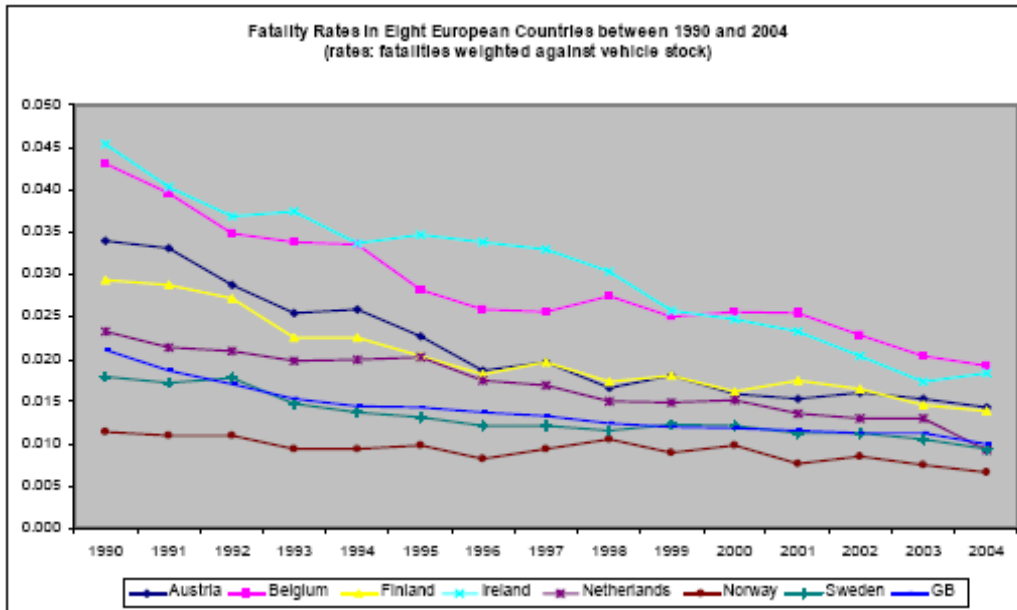
This was a sensible measure, but accidents continued to occur so in 1977 they found it necessary to use full power dipped (or passing beam) headlights to remind people to drive on the right hand side of the road.

Appendix 1 Increased accidents caused by Daytime Running Lights - continued

Extracts from MAG UK response to EC DRL consultation October 2006 by Dr. Elaine Hardy Phd

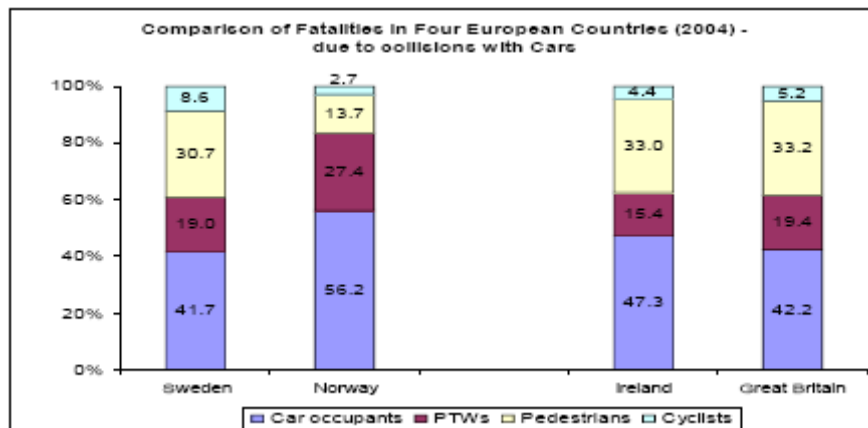
These are reproduced to indicate that there is no benefit between DRL using and non DRL using countries.

Figure 1



As Figure one demonstrates, there has been an overall reduction in fatalities throughout the eight countries analysed. Most significant are the reductions in Belgium and Ireland where fatality rates have decreased respectively from 0.043% to 0.019% in Belgium and from 0.045% to 0.018% in Ireland between 1990 and 2004, in other words, fatality rates have more than halved in both countries. In fact with the exception of Norway, fatalities have halved in ALL countries irrespective of whether there is mandatory DRL or not.

Figure 2



In terms of percentage differences, the following figure demonstrates that Sweden and Great Britain have very similar collision data. Norway and Ireland both have small populations, however what is evident from the following figure is that Norway – a DRL country has a higher proportion of fatalities between vehicle users – i.e. cars and cars (56.2%); cars and motorcycles (27.4%) (which all have head lights), though a lower proportion of fatalities due to collisions between cars and pedestrians (13.7%) and cars and cyclists (2.7%). Norway also has a higher proportion of fatalities between vehicle users in comparison to Sweden – another DRL country - where the fatalities due to car collisions is 41.7% and 19% for collisions between cars and motorcycles.

What can be observed in Figure two is that there is a significantly higher proportion of pedestrians killed by cars in Ireland (33%), Great Britain (33.2%) but ALSO in Sweden (30.7%) compared to other 'so called' vulnerable road users. In fact in Sweden 8.6% of cyclists are killed by cars compared to only 4.4% in Ireland and 5.2% in Great Britain. However, as mentioned previously, in Norway the proportion of motorcyclists killed by cars is significantly higher than the countries not adopting mandatory DRL (27.4% compared to 15.4% in Ireland and 19.4% in Great Britain).

Data source:

www.dadri.org.uk/docs/MAG%20UK%20response%20to%20the%20EU%20Commission%20Consultation%20on%20DRL.pdf

Appendix 2 Academic opinion against Daytime Running Lights

Extract from submission to the EC consultation 16 November 2006 by Professor Steve Johnson Ph.D in physics. His work involves statistical analysis in computer models.

CONCLUSIONS: I have reviewed two modern assessments of DRL effectiveness performed in the US. In each case there were serious flaws in the methodology and conclusions. While not directly addressing other studies that you are using to attempt to support mandatory DRL usage in the EU, many of the same commentary will still apply. The numbers are pretty much a wash, and in some cases (unfortunately) contrived. Basing a continent-wide decision on such weak data would be grossly unwise.

Respectfully submitted,

Professor Steve Johnson College Station, Texas, USA

Extracts of ophthalmic evidence of traffic under daylight conditions:

Fundamentally, DRL are a violation against the Hippocratic Oath and Human Rights.

Cognition psychology is teaching us that the driver's attention is caught by the DRL and at the same time pedestrians, bikers, obstacles on the road etc. can be overlooked very easily. In addition the not too well known 'change blindness' (elicited by DRL) can cause additional problems.

'Change blindness', 'Overload' of visual short term memory and disturbance of cognitive processes within visual pathways and visual centres may cause peculiar phenomena. 'Disability Glare': Headlights, misaligned or not can cause retinal adaptation problems, prolonged retinal recovery time (following light 'stress' - 'Macula Stress Test'), especially in elderly drivers. Complex highly dynamic traffic scenarios require subtle and sophisticated analysis within very short periods of time and adequate reactions without delays. 'Overaccentuated spots' (DRL) within the (360°) field of required constant attention and alertness cause irritation, deficits and disturbance of the extremely vulnerable equilibrium. Higher complexity: Failed to see, to perceive, to recognize, to pay attention, outside the borders of the visual field, sub-threshold stimulus.

Inattentional Blindness, Sustained Inattentional Blindness, Change Blindness, Motion Induced Blindness (Michal Bach's Computer Simulation), Repetitive Blindness etc. (Result of electrophysiological and magnetic resonance (MRI) examinations in the fields of sensory physiology, cognition psychology and brain research demonstrate and prove these functional dysfunctions.

Critical number, critical intensity

Capacitive problems of cognitive processes may occur if the number of moving light stimuli exceeds a critical quantity. DRLs or Dipped Headlights attract distributed attention. Bright images move across peripheral areas of the visual field, successively and simultaneously. Exceeding critical intensities of stimulation may inflict even more and other complications. Glare due to HID (High Intensity Discharge bulbs) and HID-LED (High Intensity Light Emitting Diodes) etc. causes irritation or even incapacities.

Extremely bright blue-white light sources cause prolonged retinal recovery times (following light 'stress') - increasingly longer with higher (average) age of traffic participants. Stray light (much worse at the short wave end of the spectrum) is adding another undesired component. Changes of light adaptation, described as 'driving in a black tunnel', gaze deviations (avoiding the annoying light or - even worse - staring at it like being hypnotized), narrowing of lid fissures or closure of one* or both eyes for a fraction of a second could provoke fatal consequences.

* the leading eye (dominating eye) stays open, the other eye reacts with blinking (blocking the visual axis) or even closure of lids: disturbed stereo vision.

Summary:

- 1) Mixed traffic (DRLs, headlights, together with no illuminated 'traffic relevant objects') (Bergisch Gladbach 2005)
- 2) Glare and stray light (disturbing adaptive processes, contrast - and stereo vision) have to be avoided (worldwide) in order to improve traffic safety for all traffic participants.

Recommendation:

Yellow filters in headlights would improve contrast vision* at the same time reducing glare and stray light
*lacking blue cones of central retinal area, reduced 'blue blur' (chromatic aberration) surrounding objects etc.

Univ.-Prof. Dr. Peter Heilig University of Vienna

Appendix 2 Academic opinion against Daytime Running Lights – continued

On the basis of the prima facie arguments from the evidence, one can predict an overall effect - namely net safety benefit, or disbenefit of daytime running lights that, e.g. balancing the "attraction" effect against the "distraction" effect, may go either way. I haven't read all of the monitoring studies; but on the basis of the equivocal findings of the studies that I have read, my impression is that the effect of daytime running lights upon the incidence of road traffic accidents, whether it be positive or negative, is too small to be detected against the confusing background of a much higher level of 'noise' from other effects. Study authors have devised tests, such as Andersson et al 1976's " Δ ratio", or odds-ratio test, that purport to distinguish the effect of daytime running lights from these other effects. But none of the tests that I have seen in the literature in fact turn out, upon scrutiny, to be specific for the effect of daytime running lights. In short it remains to be proven that daytime running lights yield a net safety benefit, or more important, do not yield a net safety disbenefit.'

Stephen Prower

(who whether in a personal capacity, or as research officer of the British Motorcyclists Federation has read and reviewed a considerable number of the studies of motorcycle or motorcar daytime running lights since 1964)

Daytime running lights are yet another measure that seeks to promote the safety of those in cars to the detriment of those outside them. You have two very convincing arguments: DRLs waste a non-trivial amount of energy, and they make all road users without lights relatively less conspicuous and therefore put them at greater risk".

Professor John Adams University College London

"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".

Professor emeritus Murray Mackay Aston University

The RAC Foundation is concerned that widespread use of DRL will reduce the perceived benefits of daytime lights to groups such as motorcycles, buses etc. and may further reduce the conspicuity of road users not equipped with DRL such as cyclists, equestrians and pedestrians.

Kevin Delaney Traffic & Road Safety Manager The RAC foundation for motoring

Light-difference threshold and subjective brightness in the periphery of the visual field.

Subjective brightness of a supra-threshold target is not dependent on its position in the visual field. A target with a given luminance will elicit the same brightness sensation at all retinal positions. As a consequence of this brightness constancy throughout the visual field, peripheral targets at threshold appear brighter than foveal targets at threshold because a peripheral target at threshold has more luminance than a foveal target at threshold.

Pöppel E.Harvey L.O.Jr Psychological Research 1973/2 (36), 95-193

Media

Would we need them if we drove with our eyes open?

John Humphrys BBC Radio 4

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

Roger Harrobin Environmental Correspondent BBC Radio 4



Appendix 3 - Government and political opposition to Daytime Running Lights

Extract from Hansard October 2006

Daylight running lights (DLRs) will increase a vehicle's fuel consumption and CO2 emissions by 1.5 per cent according to a European Commission consultation paper. The UK opposes the mandatory fitting of dedicated DLRs and the compulsory daytime use of dipped beam headlights.

Stephen Ladyman Secretary of State for Transport

Daytime Lights - epetition reply 9 February 2007

We received a petition asking:

"We the undersigned petition the Prime Minister to ensure the continued safety of users of motorcycles and scooters by fighting EU proposals to introduce daytime running lights on motorcars."

The Government's response

The UK Government is opposed both to mandatory daytime dipped headlamp use and to mandatory dedicated daytime running light (DRL) use (except where required by poor visibility, e.g. fog) for a number of reasons. These include questions over the safety of vulnerable road users such as motorcyclists, pedal cyclists and pedestrians. Other concerns are the accuracy of overall cost: benefit analysis figures, increased motoring expenses and increased carbon dioxide emissions.

The European Commission (EC) has been discussing daytime headlamp use and DRLs with Member States for quite some time. Research has been carried out into daytime headlamp use, as an aid to vehicle conspicuity: there are arguments both for and against. There are also arguments for and against the use of dedicated, low wattage DRLs (rather than dipped-beam head-lamps) which could be provided or mandated for new vehicles.

Mandatory daytime headlamp use or dedicated DRLs could have an adverse impact on the relative daytime conspicuity of vulnerable road users, such as pedestrians and cyclists, who are not illuminated.

In addition, motorcyclists currently make themselves more conspicuous in daytime (on a voluntary basis) by using dipped beam headlamps. If all vehicles were illuminated, this advantage might reduce or disappear altogether.

The costs of additional fuel expenses and pollution effects also need to be taken into account. The EC estimates, for instance, that the compulsory use of DRLs across the Union would lead to a 1.5% rise in fuel consumption and CO2 emissions.

The UK's response to the recent EC consultation on this subject highlighted these concerns. The UK's reply was informed by a study of the EC analysis, commissioned by the Department for Transport. The results support the view that the benefits have been over estimated while the additional costs to motorists have been underestimated.

Further to its consultation, recent discussions with the EC now lead us to conclude that it may not press for early adoption of mandatory daytime running lights. It is expected to reconsider the proposals during the coming year. In the meantime, the Department for Transport will continue to hold further talks with the EC to reiterate our main concerns.

Prime Minister's Petition

Vehicle Daytime Running Lights: Offence against Equality Principle

Green MEPs are opposing the plans to require vehicles to run daytime dipped headlights. They share your concerns about fuel consumption and CO2 emissions and also believe that it would lead to less visibility amongst road users other than motorists, such as pedestrians and cyclists.

Dr. Caroline Lucas MEP

We have raised with the EC our concerns that any benefits of DRLs might not be as great as claimed, and that any overall benefits might be achieved at the expense of more vulnerable road users (especially pedestrians and pedal cyclists) who will not be equipped with such lamps and will become relatively less conspicuous. In addition, we have commented that DRLs can not be introduced without some negative environmental effect due to the increased combustion of fuel to power the lamps.

John Prescott Labour Deputy Prime Minister

Appendix 3 - Government and political opposition to Daytime Running Lights - continued

I thoroughly support your campaign against mandatory day-time lights on running vehicles. My observations of those cars, notably Volvos, which routinely use such lights, is that they are both unnecessary and indeed dangerous, in that drivers misinterpret their meaning. The use of lights in this way would also be irresponsible, giving the waste of energy and the need to tackle climate change. I hope this helps.

Norman Baker MP Liberal Democrat Shadow Environment Secretary

The use of daytime lights for motorcycles is an issue that has generated much controversy. Daytime lights come in two forms; 'lights on' laws and Daytime Running Headlights. The latter involves a number of technical issues as a DRL is a special kind of light which is designed for daytime use only. We will continue to keep new research into the issue under review but at present do not support their introduction. The history of daytime lights legislation has also been mixed, with 'lights-on' laws having been subject to implementation followed by repeal (as in the state of Victoria, Australia). We believe that driving during in daylight with headlights on a high-beam should be an endorseable offence. It is not necessary and causes danger by startling other road users.

Bernard Jenkin MP Conservative Shadow Minister for Transport and for London

Vehicle Daytime Lights - pedestrian fatalities

Thank you for your recent email regarding Daytime Running Lights. I share the same concerns that you raise in your correspondence, namely that this proposal will present greater dangers to vulnerable road users and pedestrians. It is for this reason that I will be opposing this initiative as and when it reaches the European Parliament.

Gary Tittley MEP Leader of the European Parliamentary Labour Party Brussels

Just to confirm that ALL UKIP MEPs are against Daytime Running Lights and will vote against.

Mike Natrass MEP (Transport Committee)

Appendix 4 - Environmental Pollution from Daytime Running Lights

The British Wind Energy (www.bwea.com) indicate that 1874 wind turbines have been erected by August 2007 in England, Wales, and Scotland totalling 2,186MW.

These 1,874 wind turbines save approximately 2.3 million tonnes of Carbon Dioxide emissions per annum.

The Carbon Trust with an army of 250 energy consultants only managed to identify (not achieve) 3.9million tonnes of CO₂ savings last year.

Currently the 622,000 Volvos on UK roads plus say 200,000 copycat drivers cause about 50,700 tonnes of unnecessary CO₂ emissions p.a. by using headlights, sidelights and instrument lights in good daylight.

If all 31 million vehicles on UK roads used unnecessary daytime running lights 1.9 million tonnes of extra CO₂ would be produced negating 83% the benefits of the UK's expensive investment in renewable energy.

Roy Milnes Ieng MinstEnergy

