
Drivers Against Daytime Running Lights – UK

Mr. Hugh Reid Managing Director
Volvo Cars UK Ltd.
Globe Park
Marlow
Bucks
SL7 1YQ
Dear Mr. Reid,

Page 1 of 2
15 October 2003

Daytime Running Lights (DRL)

It is with disappointment to note that despite previous representations to Volvo UK, that you continue to produce vehicles with DRL contravene the UK law.

Full power low beam DRL means every time a Volvo driver traverses a speed hump or a pothole, he breaks the UK law (Highway code rule 94 *Law RVLR reg 27*) by causing dazzle and discomfort to other motorists as the self levelling mechanism cannot react fast enough.

Also the H4 Tungsten halogen headlight lamps are prone to failure before service intervals. There are an increasing number of Volvo's driving around with only one headlight illuminated. This is illegal at night when a driver requires two functioning headlights.

We submit that daytime headlights are marketing gimmick which may be valid in the wastes of Sweden but in densely populated highly urbanised countries they cause a danger all other less conspicuous road users, a group to whom accidents are increasing in the UK, and also cause unnecessary environmental pollution.

Please may I lodge with you a copy of the 95 page research document by Perlot and Prower 2003 (also available from www.dadrl.org.uk) which proves that previous research used to claim DRL have a benefit uses flawed data. I list an extract from the conclusion:

Review of the evidence for motorcycle and motorcar daytime lights

In conclusion, the formal evidence of the monitoring studies of the effect of both motorcycle and motorcar daytime lights fails to establish satisfactorily that daytime lights have had any overall effect to reduce accidents. The methods that the studies have employed are inherently flawed: the odds-ratio method is not specific to the effect of daytime lights, and the fleet study method is incapable of distinguishing between the immediate novelty effect of daytime lights, and their enduring true effect. The prima facie arguments in favour of motorcar daytime lights in turn fail to rescue the studies. On the positive side of the balance, the effect of daytime lights to reduce accidents is likely to be trivial. On the negative side there are important potential adverse side-effects.

The use of DRL by one group will eventually force other drivers to use DRL thus negating any claimed benefit; the consequence is that more vulnerable less conspicuous road users will be at more risk.

There is also growing evidence from the USA that DRL can cause eyesight damage which could lead to class action claims.

On the environmental front, since 1997 General Motors has forced most USA motorists to use daytime running lights. Generating electricity from a vehicle engine is extremely inefficient due to mechanical and engine heat losses. To run two 55 watt headlights and associated lamps takes 970 watts of fuel energy. It is calculated that DRL will cost the USA \$600 million dollars using 406 million US gallons of fuel p.a. creating 33 million tonnes of carbon di-oxide pollution p.a. (source <http://www.howstuffworks.com> search "daytime lights" or question 424).

Across the EU, probably the emissions would be similar to the USA. May I quantify the waste for the UK:

UK Daytime driving only	No. of vehicles	Litres of fuel p.a.	MWh	Costs	Tonnes of CO2 p.a.
Present DRL users	670,000	15.8 million	167,360	£11.8 million	41,840
Total UK vehicle parc	26 million	612,707 million	6,494,694	£495.5 million	1,623,673

The facts are not firm, it is hard to quantify how many boy racers encouraged by Ford and Volvo, blaze around with headlights AND fog lights on in good daylight so we are open to fine tuning of the data. To put the potential waste in perspective this is more than the annual output of Oldbury on Severn nuclear power station - more than 2.4 TIMES all the power generated by green renewable sources last year in the UK!

As you may know the year on year decline in UK road accidents has stopped (please see www.safespeed.org.uk), in particular accidents to pedestrians, cyclists and motorcyclists are increasing. The City of London has reported a particularly sharp increase in accidents to these groups. Nationally, this is due to the government's misguided policy of persecuting rather than educating drivers and improving the road network.

We believe a contributory factor is the increase in DRL usage promoted by irresponsible manufacturers which affects the hazard perception abilities of other drivers.

In response to hundreds of vehement complaints about dazzle and glare in the USA, the NHTSA is being forced to issue a directive requiring a much reduced DRL intensity (please see <http://dms.dot.gov/search> at the docket number window, type in "4124").

We are writing to all manufacturers to draw the safety and environmental dangers to their attention, I hope that you and your board members will consider carefully the implications of DRL.

Formally, we must advise that if an accident occurs due to glare and distraction caused by any of your vehicles, Volvo Cars UK Ltd, Ford Motor Company Ltd, Ford of Europe GMBH, their directors and individual Volvo drivers could be deemed to be held personally liable unless action is taken to stop the use of DRL on your vehicles in the UK. As many of your vehicles are company owned, the Health and Safety Executive may also become involved.

We are sure that Volvo UK would not wish to be associated with the causation of an increase in accidents to less conspicuous more vulnerable road users or to violate the law, therefore would suggest that in the light of this new evidence, that you disable the DRL function on imported UK cars and initiate a recall to disable DRL on all existing Volvo cars.

It is interesting to observe that some discerning safety conscious Volvo drivers voluntarily disable the DRL.

Please understand that we think there is some merit in non glaring DRL, the dimmed dipped headlights used by early Volvos is an excellent example. When used without tail lights, this principle or the rim LED lights used by BMW, should be adopted by all other manufacturers.

Yours faithfully,

Roy Milnes UK Co-ordinator DADRL Drivers Against Daytime Running Lights
www.dadrl.org.uk
www.lightsout.org

cc

Health and Safety Executive

Vehicle inspectorate

The Law Society

Association of British Insurers, Director Mary Francis, 51 Gresham Street, London, EC2V 7HQ

Council for the Protection of Rural England

Friends of the Earth

Pedestrians Association

Cyclists Touring Club

British Motorcyclists Federation

www.dadrl.org.uk website

Drivers Against Daytime Running Lights – UK

Gerry Keaney Managing Director
Volvo Cars UK
Globe Park
Marlow
Bucks
SL7 1YQ

31 May 1999

Dear Mr. Keaney,

Volvo Cars - Dangerous Daytime Headlight Glare

On behalf of Drivers Against Daytime Running Lights, please may we ask why Volvo Cars UK are contravening the 1999 UK Highway Code by continuing to import cars into the UK with dangerous daytime headlights?

The relevant 1999 UK Highway Code rules are:- (items in capitals are mandatory)

Rule 201

You MUST use headlights when visibility is seriously reduced, generally when you cannot see for more than 100 metres. You also may use front or rear fog lights (in addition to headlights) **but you MUST switch them off when visibility improves** (see rule 211).

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Rule 211

You MUST NOT use front or rear fog lights unless visibility is seriously reduced (see rule 201) as they dazzle other road users and can obscure your brake lights. You MUST switch them off when visibility improves.

Rule 94

You MUST NOT

- Use any lights in a way which would dazzle or discomfort to other road users.
- Use front or rear fog lights unless visibility is seriously reduced.
- You MUST switch them off when visibility improves to avoid dazzling other road users.

Other rules which DRLs violate:-

Rule 180

The most vulnerable road users are pedestrians, cyclists, motorcyclists and horse riders. It is particularly important to be aware of children, elderly and disabled people and learner and inexperienced drivers and riders.

Rule 183 Particularly vulnerable pedestriansetc. [DRLs put all less conspicuous road users at risk]

Rule 125 Be considerate ...etc. [DRLs are not]

Rule 126 Safe Driving needs concentration...etc. [hard to concentrate when blinded by DRLs]

We testify that daytime running lights cause dazzle, distraction and discomfort to DADRL members, infringing their personal safety and the safety of all more vulnerable, less conspicuous road users in violation of rule 94.

Some illustrated examples are attached.

As safety is a major marketing tool for Volvo, we look forward to Volvo grasping the initiative now, respecting the letter and intent of the UK Highway Code by stopping the import of new vehicles and recalling all existing vehicles with dangerous daytime headlights.

Yours sincerely,

Roy Milnes - UK co-ordinator DADRL

Editors notes

We believe that Volvo and Saab are using daytime running lights (DRLs) as a marketing scam claiming they aid safety. The converse is true.

- The DETR nor Volvo UK cannot produce any figures to show DRLs are safer in the UK.
- EU road safety data shows that road deaths in the UK are similar despite the use of DRL's in Sweden.
- The EU Transport commissioner is relying upon consultant reports using projections - not hard facts.
- DRL's are banned in Italy.
- In Australia motorcycle DRL's were tried but repealed in the face of persistent objections by motorcyclists. There was no monitoring exercise.
- Israel dropped their use of DRL's after they found an increase in accidents.
- The Netherlands government was stopped from introducing a trial DRL law by a lone pedal-cyclist campaigner.
- Canada uses DRL's and claimed a 12% reduction in accidents, but at the same period USA accident figures declined by the same amount.
- The USA's Highway Loss Data Institute has found that there was an increase in injury claims associated with these cars using DRLs than comparable vehicles without DRLs (bulletin vol. 15 1 Dec97) :-
- 18% Volvo 850
- 12% Saab 900
- 15% Volkswagen Jetta
- The 1999 Country Lanes and Villages Bill has passed its first reading in the House of Commons. It imposes a speed limit of 40mph on unclassified roads; it permits local authorities to designate certain areas as "quiet" lanes, where pedestrians, cyclists, and horse riders will have priority over mechanical transport. The second reading is due on 11/06/99.
- Volvos barging along with glaring headlights will be the antithesis of the intent of this bill.

Imagine a company car, taxi or HGV driver at the end of a long shift about to pass your child walking or cycling along when a Volvo lumbers into view with distracting headlights - who is the most vulnerable?

Copies to:-

DETR John Prescott / Dean Dyer
EU Neil Kinnock / Gert van Koopman
All UK motor companies
All UK motor publications
All UK newspapers
National Police Driving School / Richard Ward
ITV Driven / IWDS / Louise Doyle
BBC tv Watchdog / Anne Robinson

The Pedestrians Association / Ben Plowden
The Ramblers Association/ Andrew Bennett MP
The Cyclists Touring Club / Phil Liggett
The British Horse Society /
The British Motorcycle Federation / Stephen Prower
The Road Haulage Association / S. J. Norris

Attached:-

A Danger at Any Speed - issue 5

Danger at any speed.rtf

Reference Links

www.lightsout.org
www.motorists.org National Motorists Association
<http://metalab.unc.edu/rdu/> Reasonable Drivers Unanimous
www.DOT.gov - click on DOT DOCKETS click on search type 4124 under docket (FMSS rule no 108)

Volvo Car UK Limited

14 January 1999

Our ref: JL/mhw

Mr R Milnes
8 Millers Meadow
Rainow
Macclesfield
Cheshire
SK10 5UE

Dear Mr Milnes

I have now had the opportunity to take up your complaint in respect of headlight glare from Volvo cars with experts in Sweden and the UK.

- The NHTSA Docket 4124 is a proposal to change the requirements for Day Running Lights - not to ban them. If this has any impact on our specification, it would of course be reflected in production cars.
- Because we are convinced of the benefits of the adoption of DRL's we do not recommend the option of being able to switch off DRL'S. In fact, evidence is growing of the benefits of DRL's with SWOV in the Netherlands discussing their possible introduction all over Europe. Our opinion remains that properly adjusted dipped headlights are not glaring - neither in daylight nor during night driving. We have also sought evidence for the effectiveness of DRL's with the Transport Research Laboratory and have concluded from all the available reports that there is a reduction in the accident rate as a result of DRL use.

Having discussed with our Marketing department the depiction of cars displaying supplementary lights in good conditions we have agreed that we will ensure that future executions are appropriate to the weather or time of day. The only ASA adjudication we are aware of is that of 11 August where the complaint was not upheld.

- Having looked at your statistics on fatalities per million miles, we are not convinced that you can draw the conclusion that DRL's should be banned as they do not make a contribution to road safety. Looking at all the countries listed, traffic densities are different, driving test standards vary, the mixture of road types (dual carriageways, motorways etc) differs and enforcement of driving laws is variable - all these factors have a bearing on the safety not just of drivers, but also other vulnerable road users.

We are convinced that the use of Day Running Lights/Permanent Dipped headlights has improved standards of safety - particularly in poor weather when too many drivers fail to switch on the appropriate lights.

We therefore stand by the position we took when we wrote to you last July.

Yours sincerely

Gerry Keane

Managing Director

Drivers Against Daytime Running Lights – UK

Gerry Keaney Managing Director
Volvo Cars UK
Globe Park
Marlow
Bucks
SL7 1YQ

23 December 1998

Dear Mr. Keaney,

Volvo Cars - Dangerous Headlight Glare

I represent a growing group of citizens who are members of the Association of British Drivers, British Motorcycle Federation and Ramblers, (total membership 135,000) who are opposed to the dangerous headlight glare from Volvo and Saab cars. We have established links with Lightsout and the National Motorists Association of the USA.

As Volvo are the leading proponent of Daytime Running Lights (DRL's) in the UK please may we ask:-

1. In view of the USA NHTSA (rule No. 108 Docket 4124) proposal to ban the use of full power headlights during daylight, have Volvo UK any plans to stop importing vehicles with glaring headlights?
2. Do Volvo UK have any plans to recall and modify all existing vehicles to allow drivers to switch their glaring headlights off in good daylight?
3. Do Volvo UK intend to stop issuing advertising material depicting the illegal use of supplementary lights in good conditions?. The Advertising Standard Association have advised you that it is illegal to use these lights in the UK other than during falling snow or fog. However I have just received advertising depicting these lights on. My local Volvo showroom is full of similar literature.

We are aware of the weighty research carried out in Sweden and Holland (where coincidentally Volvo have manufacturing plants) but this deals with projections a specific type of accident and is not valid for the UK or USA. EU road safety data for 1989 - 1995 shows that Sweden is not as safe as the UK despite the use of DRL's in Sweden.

(source - The Times 03/06/98)	Fatalities per million miles
Britain	64
Sweden	65
Germany	116
France	145
Spain	147
Greece	195
Portugal	217

Finally please consider this, yesterday I had to rise at 04:00 to get round the M5/M6 Birmingham traffic jam for a day's work on site (I need the car to carry my energy survey instruments), the drive was not pleasant due to fools abusing fog lights and vehicles with glaring headlights. My journey took me past Marlow.

At the end of the day my next port of call could be where you live, imagine a member of your family walking or cycling along the road and a powerful, nose heavy Volvo lumbers into view. I ask you who is the most vulnerable?

We believe DRL's to be a danger in the UK. As Volvo like to appear in the forefront of safety, I urge Volvo UK to grasp the initiative now, publish a correction regarding the illegal literature and stop importing vehicles illuminated like Christmas trees. This would reduce driver visual fatigue and dangers to less conspicuous road users.

We propose to start issuing press releases mid January, but if your response is positive we may not need to, I look forward to hearing from you.

Yours sincerely,

Roy Milnes

Drivers Against Daytime Running Lights – UK

Denise Branch
Volvo Car UK Ltd.
Globe Park
Marlow
Bucks SL7 1YQ
Dear Ms. Branch,

16 March, 2005

Volvo cars - a Danger At Any Speed

I thank you for the courtesy of your letter of 01/07/98. The ASA have accepted and are investigating my complaint about the illegal depiction of fog or driving lights in good conditions in you sales literature.

Or main complaint about VOLVO cars, is the danger to other road users including pedestrians, cyclists, motorcyclists and the majority of other UK motorists who can be distracted by the unnecessary glare from VOLVO headlights. A motorist dazzled by an oncoming VOLVO could easily miss observing a small child, or other road users due the masking effect as the eye tries to adjust to the glare. The extra glare also contributes to driver fatigue.

I find that there is a growing number of people concerned about this danger. We are forming a pressure group to lobby senior government officials to ban the sale of Volvo cars with glaring headlights in the UK and instruct VOLVO to recall all existing vehicles for rectification.

Contact has been made with Senior Government Ministers, the Home Office and the DETR about the dangers including road rage the extra environmental pollution caused by VOLVO cars. In conjunction with the DETR, Neil Kinnock has kindly sent us the weighty SWOV report. This recommends the use of DRL (daytime running lights), but this research is mainly based upon sparsely populated countries such as Norway, Sweden, Australia and Canada.

Conditions in the densely populated, urbanised UK are quite different, our expert opinion reveals that there are several flaws in the SWOV report when applied to the UK. We have no objection to VOLVO filling their cars full of air bags with construction of a tank to increase secondary safety of VOLVO passengers, but we maintain that blinding headlights impinge on the safety of other road users by masking other drivers from observing small but vital defensive driving safety details such as feet under parked vehicles, a small child, a ball bouncing into the road, traffic signs etc.

If VOLVO continue using headlights they should equip pedestrians, cyclists and animals with equally bright lights!

With the financial and professional support from organisations representing other road users, our next step is to lobby the Government, the EU, insurance companies, the motoring press and other organisations representing road users in other countries. This will include small low cost adverts in local papers in towns which have VOLVO dealerships to generate more widespread public support warning people of the dangers posed by VOLVO cars.

As fatalities per million miles are lower in the UK than Sweden, it appears that the main reason VOLVO promote headlights is to gain marketing advantage over other manufacturers, this being borne out by your sales literature.

However before we launch our campaign, you may wish to advise us what are the technical and safety reasons for VOLVO promoting the use of headlights in good daylight in the UK along with any evidence you have to support this.

VOLVO may also consider modifying their imported cars with automatic headlights and discouraging their existing drivers from using headlights until any legislation is passed in the UK, however we are of the opinion that this will not happen voluntarily without government pressure or sales and residual values are affected.

We look forward to you response.

Yours sincerely,

Roy Milnes

Dear Mr Milnes

Thank you for your e-mail dated 02 February 1998 addressed to Sweden which has been passed to us here in Marlow for attention.

I was pleased to learn that you are possibly considering purchasing one of our products, but have a reservation regarding the aspect of the headlights.

You do not mention which model of Volvo you are interested in, but I can confirm that on the Volvo S/V40 it is not possible to modify the lights. If a modification were available then as manufacturers we would not recommend it, as the use of daytime driving lights is a feature of the UK specification. Should this be altered in any way then the model would no longer be "type approved". This would have serious implications to the insurance cover on your car as it would no longer be a recognised model.

Following extensive research, it has been shown that due to similarities in climate and light levels, the use of daytime driving lights in Nordic countries and within the UK has been an effective safety feature. The benefits of increased visibility is supported by the lower insurance grouping offered to Volvos.

However, it is possible by a small modification to have the lights switched off if the customer prefers on the Volvo S/V70 range. Dean Smith of Macclesfield would certainly be able to advise you further on this.

With regard to the use of fog lights in good visibility conditions, unfortunately this is not an aspect generic to Volvo. Regrettably this can only be attributed to discourteous and inconsiderate driving policies.

Thank you for taking the time to contact us and I hope that the above will assist in some way and that we may be able to welcome you in the future as one of our valued customers.

Yours sincerely

Lesley Milne
Customer Service Manager