



ANTICSS

ANTI-CIRCUMVENTION OF STANDARDS
FOR BETTER MARKET SURVEILLANCE

NEWSLETTER Nº 3 NOVEMBER 2020

INTRO: ABOUT ANTICSS

ANTICSS objectives are to define and assess 'circumvention' in relation to EU Ecodesign and Energy labelling legislation and their harmonised standards and to clearly delimitate circumvention from other similar, but legal effects to facilitate unambiguous public communication.

ANTICSS goals include a support to an effective EU legislation enforcement and thus an increased acceptance and trust of market actors and civil society into the Ecodesign and Energy labelling legislation.

More: www.anti-circumvention.eu/about-project/project-introduction

ANTICSS LABORATORY TESTING OF SELECTED MODELS FINISHED MAIN FINDINGS

This newsletter presents the main findings of work package WP4, the assessment of circumvention impacts by laboratory testing.

Selection procedure for models to be tested

Based on the final selection of 8 product categories and 18 suspicious cases to be tested, the selection of each three models per product category for laboratory testing has taken place. A systematic selection procedure has been developed, specifically targeted at finding appliances with a high probability of a 'circumvention' behaviour. Therefore, the ANTICSS test results do not provide a representative overview of the tested product categories on the market. For independent testing, the models were delivered to specialised laboratories being partner in the ANTICSS project.

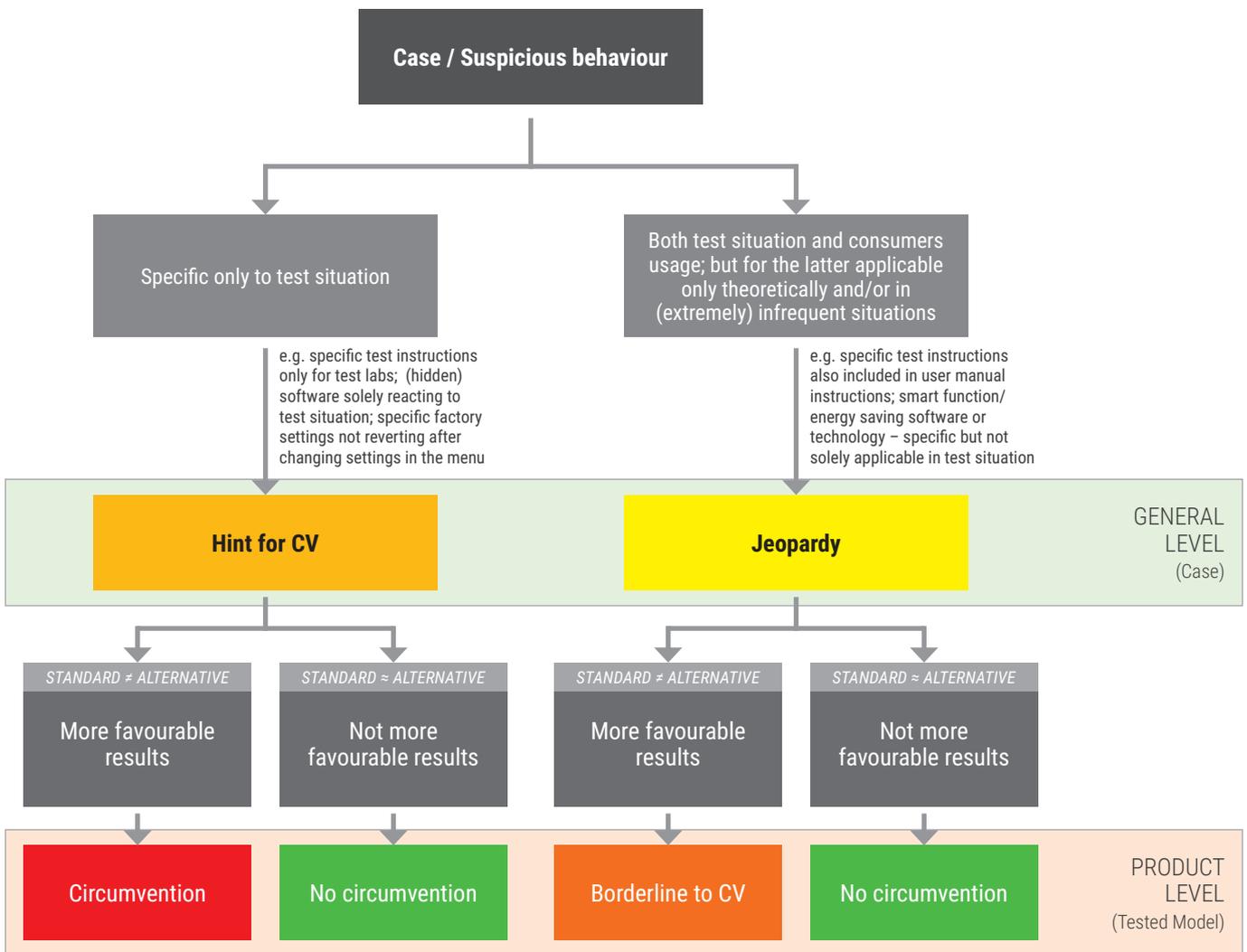
More: www.anti-circumvention.eu/storage/app/media/D15_ANTICSS_Model-selection_final.pdf

Development of alternative test methods

When products are specifically pre-set or manually altered or are able to detect to be under test or if specific loopholes or weaknesses in standards and/or legislation are exploited, they result to be compliant with the applicable requirements when tested with the standardised test methods. Therefore, for each of the suspicious cases to be tested, the ANTICSS project team developed alternative test procedures. Only the conditions of the standard tests considered as being detected or exploited were varied in the alternative test methods to check the response of the tested product. At the same time, the alternative procedures were still designed as close as possible to the standard procedures with the aim to ensure sufficient comparability with the standard measurement results. An inexplicable variation in the measurement results of the alternative approach was considered as an indication of a possible 'circumvention' behaviour of the tested product.

More: www.anti-circumvention.eu/storage/app/media/D14_ANTICSS_Alternative-test-procedures_final.pdf

ANTICSS categorisation of cases and tested models



Results of the ANTICSS laboratory testing

GENERAL LEVEL (Case)		PRODUCT LEVEL (tested Model)		
		Model A	Model B	Model C
TV 1	hints for CV	no CV	no CV	no CV
TV 2/3	jeopardy effect	no CV	no CV	no CV
COLD2/4	jeopardy effect	no CV	no CV	door opening test, cf. Case COLD3
COLD 3	jeopardy effect	not tested	not tested	borderline to CV
DISH1	hints for CV	no CV	not tested	not tested
DISH2	hints for CV	not tested	no CV	not tested
DISH3	hints for CV	not tested	not tested	CV
DISH4		not tested	missing representativeness of the standard	not tested
DRIER1	hints for CV	no CV	not tested	not tested
DRIER2	hints for CV	no CV	no CV	no CV
OVEN1	jeopardy effect	borderline to CV	alternative test not applicable	borderline to CV
OVEN2		not tested	no CV	no CV
OVEN3	jeopardy effect	not tested	borderline to CV	no CV

More: www.anti-circumvention.eu/project-activities/circumvention-products-investigated

Impact assessment

For four product groups (televisions, dishwashers, refrigerators & freezers, and ovens) where the ANTICSS laboratory testing confirmed a categorization of 'circumvention' or 'borderline to circumvention' at product level, a quantification of the impacts on energy and water consumption has been conducted. In a potential extensive circumvention scenario, the total annual losses of potential primary energy savings that could be avoided, if circumvention does not occur during appliance testing, could sum up to 1,434 GWh per year, the project calculated.

More:

www.anti-circumvention.eu/storage/app/media/D19a_ANTICSS_Circumvention_Impact_Assessment_final.pdf

Summary report available

This report summarizes the main outcomes of all previous work packages: the ANTICSS understanding and definitions of 'circumvention', a clear delimitation of 'circumvention' from other effects to facilitate unambiguous public (media) communication due to the fact that the term 'circumvention' is still understood and used differently by various stakeholders; the outcomes of the ANTICSS laboratory testing, the outcomes of the ANTICSS impact assessment as well as conclusions about identified cross-cutting aspects with regard to circumvention.

More:

www.anti-circumvention.eu/storage/app/media/D20a_ANTICSS_Consolidation_circumvention-habits_final.pdf

OUTLOOK: CAPACITY BUILDING FOR MARKET SURVEILLANCE AND TEST LABS; RECOMMENDATIONS FOR POLICY AND STANDARDISATION

Starting now: The main ANTICSS results of the previous work packages, especially the findings of the laboratory testing, will serve as basis for the preparation of technical guidelines and education content for capacity building of MSAs and test laboratories (work package WP5), as well as recommendations for policy makers and standardisation organisations (work package WP6).

MAIN EVENTS AND DISSEMINATION WORK

Members of the project team are regularly attending and presenting the project at the meetings of the ADCO groups of market surveillance authorities, the technical committees of the standardisation organisations, and to other professional stakeholders.

3rd Advisory Board meeting

An international Advisory Board supports the ANTICSS project team through mutual knowledge transfer and dissemination of the results to their specific networks. On 22 June 2020, the third Advisory Board meeting has taken place to discuss the initial results of the laboratory tests and conclusions with regard to the categorization of the cases.

More:

www.anti-circumvention.eu/contacts/advisory-board

CEN-CENELEC working group

The ANTICSS project was presented by the project coordinator, Oeko-Institut e.V., at a workshop on "Anti-circumvention in Ecodesign und Energy Labelling standards" organised by the CEN-CENELEC Ecodesign Coordination Group. The goal of the presentation was not only to share latest project results, but also to discuss the initiation of guidelines on circumvention with professional stakeholders from the standardization community.

More:

www.anti-circumvention.eu/news-post/anticss-presented-cen-cenelec-working-group-workshop

ANTICSS presented at Electronics Goes Green conference

The main findings of the ANTICSS project were introduced to the scientific community in a paper and a presentation at the Electronics Goes Green 2020+ online event.

More: www.anti-circumvention.eu/news-post/electronics-goes-green-conference-2020

Blog: New ways of circumventing legislation and standards uncovered

Kathrin Graulich from the Oeko-Institut, coordinator of the ANTICSS project, is investigating the tricks used by manufacturers of electrical appliances to circumvent minimum requirements and measurement standards in the field of ecodesign and energy labelling. The aim of the project is to strengthen confidence in the two policy instruments and their effectiveness. In a personal blog, she wrote about the initial findings of the ANTICSS project.

More: <https://blog.oeko.de/oekodesign-neue-moeglichkeiten-zum-umgehen-der-grenzwerte-und-messnormen-aufgedeckt-de-engl/#ecodesign>

CONTACTS

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OCTOBER 30TH, 2020
Electronics Goes Green Conference 2020
Online presentation "Avoiding losses of energy savings caused by possible circumvention of EU Ecodesign and Energy labelling regulation and standards".

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Household tumble driers test analysis available
Results and analysis of the laboratory tests of household tumble driers available

AUGUST 13TH, 2020
Analysis of laboratory tests of domestic dishwashers
Results of dishwasher tests investigating possible circumvention available

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Draft final test reports for TVs, refrigerators, dishwashers and