



# ANTICSS

ANTI-CIRCUMVENTION OF STANDARDS  
FOR BETTER MARKET SURVEILLANCE

## NEWSLETTER N° 4

MAY 2021

### 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. The project has started in 2018 and will last until September 2021.

More about the project:

[www.anti-circumvention.eu/about-project/project-introduction](http://www.anti-circumvention.eu/about-project/project-introduction)

### NEW: TEST REPORTS ON WASHING MACHINES, ROOM AIR CONDITIONERS AND HEATERS PUBLISHED

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, the ANTICSS project team developed alternative test procedures to specifically target circumvention. All results of the ANTICSS tests done by independent laboratories are now available for televisions, dishwashers, ovens, driers, household refrigerators & freezers, and – new – for washing machines, room air conditioners and space heaters.

More:

[www.anti-circumvention.eu/project-activities/circumvention-products-investigated](http://www.anti-circumvention.eu/project-activities/circumvention-products-investigated)



## New results of the ANTICSS laboratory tests

GENERAL LEVEL (Case)	PRODUCT LEVEL (tested Model)		
	Model A	Model B	Model C
WASH1.2 jeopardy effect	no CV	no CV	borderline to CV
WASH3 hints for CV	no CV	no CV	no CV

For washing machines, the test results showed that the machine might be optimised in a way to gain more favourable results for the energy and water consumption at the two testing points of full and half load as specified in the harmonised standard, whereas the consumption values were higher when the machine was run at lower loads.

For room air conditioners and heaters, the results of the alternative testing were not assessable in terms of circumvention; the cases rather turned out as missing representativeness of the standard compared to real-life usage.

## UPDATED: IMPACT ASSESSMENTS

For four product groups (televisions, dishwashers, refrigerators & freezers, and ovens) where the ANTICSS laboratory testing confirmed a categorization of 'circumvention' or 'borderline to circumvention', a quantification of the impacts on energy and water consumption has been conducted. Now, the impact assessment has been updated with the case of washing machines.

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 of these product categories, could sum up to 1,626 GWh per year, the project calculated.

Full details are available here:

[www.anti-circumvention.eu/storage/app/media/D19a\\_ANTICSS\\_Circumvention\\_Impact\\_Assessment\\_final.pdf](http://www.anti-circumvention.eu/storage/app/media/D19a_ANTICSS_Circumvention_Impact_Assessment_final.pdf)

## UPDATED: SUMMARY REPORT ON ALL ANTICSS RESULTS

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 updated outcomes of the ANTICSS laboratory testing, the updated outcomes of the ANTICSS impact assessment as well as conclusions about identified cross-cutting aspects with regard to circumvention.

Full report:

[www.anti-circumvention.eu/storage/app/media/D20\\_ANTICSS\\_Consolidation\\_circumvention-habits\\_final.pdf](http://www.anti-circumvention.eu/storage/app/media/D20_ANTICSS_Consolidation_circumvention-habits_final.pdf)

## NEW: GUIDELINES FOR MARKET SURVEILLANCE AUTHORITIES AND LABORATORIES TO TARGET CIRCUMVENTION IN COMPLIANCE VERIFICATION

One main target of ANTICSS is to enhance the capacity of Market Surveillance Authorities and test laboratories to better detect and ideally prevent future circumvention cases under EU Ecodesign and Energy label. The ANTICSS guidelines inform about the current legal framework for MSAs to tackle circumvention, explain the ANTICSS definitions and understanding of circumvention including delimitation to other aspects such as non-compliance or missing representativeness of test standards. In detail, the guidelines explain the adapted steps of the compliance verification procedures for MSAs and alternative testing approaches by test laboratories to specifically target circumvention. As some of these steps are going beyond the current legal framework, the guidelines give orientation for further follow-up measures.

The two guideline documents for MSAs and test labs are available here:

[www.anti-circumvention.eu/project-activities/guidelines-and-recommendations](http://www.anti-circumvention.eu/project-activities/guidelines-and-recommendations)

## UPCOMING: RECOMMENDATIONS FOR POLICY AND STANDARDISATION

Circumvention under EU Ecodesign and Energy labelling is a rather new topic, with many details and processes still to be specified; for example, some of the ANTICSS definitions of circumvention as well as test methods alternative to the harmonised standards to target circumvention in laboratory testing are beyond the current legal framework. This makes the compliance verification with regard circumvention difficult yet for MSAs. Thus, the final task of ANTICSS will be to develop recommendations for policy makers and standardisation organisations based on the overall findings of the project. In May and June, ANTICSS will draft preliminary recommendations, gather positions by NGOs and industry representatives in view of circumvention and present those recommendations to representatives of policy and standardisation organisations.

## MAIN EVENTS

### Online workshops for market surveillance authorities and test laboratories

Market surveillance authorities and test laboratories play a key role in the verification of product compliance and product testing and are at the front line for detecting possible circumvention. However, currently, there is no ample knowledge or experience in dealing with circumvention as non-compliance. With a view to supporting MSAs and test labs in tackling circumvention specifically, ANTICSS is organising two 90-minutes online workshops on 11 and 12 May 2021.

Further information:

[www.anti-circumvention.eu/news-post/anticss-event-market-surveillance-authorities](http://www.anti-circumvention.eu/news-post/anticss-event-market-surveillance-authorities)  
[www.anti-circumvention.eu/news-post/anticss-event-test-labs](http://www.anti-circumvention.eu/news-post/anticss-event-test-labs)

### eceee summer study

The ANTICSS project has been selected for presentation at the eceee summer study conference that will take place online 7–11 June 2021. We do invite you to follow the event and use the opportunity to learn about our achievements at this conference.

## ANTICSS results presented to standardisation organisations

ANTICSS results were presented at the standardisation committee DKE/K 513 on Household appliances on 4th May 2021 and will be presented at the CEN-CENELEC Technical Committee TC 59X (Performance of household and similar electrical appliances) on 22nd June 2021.

## Online workshop for European and Asian manufacturers and other stakeholders

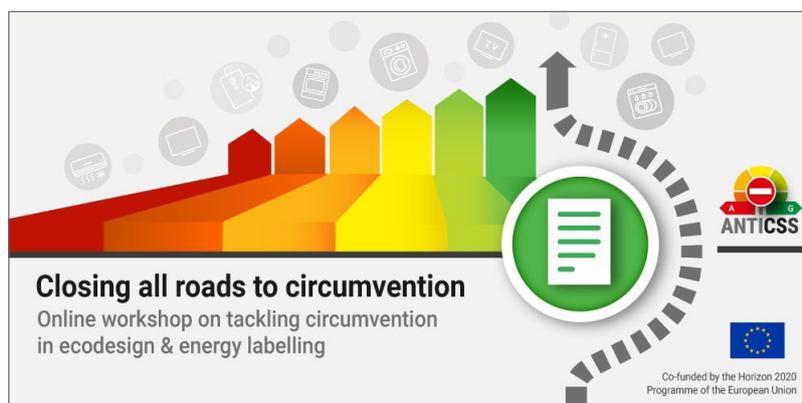
Laboratories, Market Surveillance Authorities and Certification Institutes play a key role in product testing and are at the front line for detecting possible circumvention. With a view to supporting all stakeholders in specifically tackling circumvention, VDE together with Oeko-Institute and University of Bonn are organizing a 90-minutes online workshop on 29th of June at 9:00 AM Central European Time (03:00 pm Peking time).

## Agenda and registration:

[www.anti-circumvention.eu/news-post/online-workshop-european-and-asian-manufacturers-and-other-stakeholders-29-june-2021](http://www.anti-circumvention.eu/news-post/online-workshop-european-and-asian-manufacturers-and-other-stakeholders-29-june-2021)

## National events

The ANTICSS project has partners in eight European countries – and project results will be introduced and shared with stakeholders at national levels in each of these countries (Austria, Belgium, Czech Republic, Germany, Italy, Netherlands, Portugal, Spain). The events will take place between May to September 2021, please, contact the project coordinator or individual **partner organisations** to learn more about the events, dates and opportunities to participate.



## CONTACTS

Contacts to the project coordinator and the team:

[www.anti-circumvention.eu/contacts/team-and-contacts](http://www.anti-circumvention.eu/contacts/team-and-contacts)

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