



ANTICSS

ANTI-CIRCUMVENTION OF STANDARDS
FOR BETTER MARKET SURVEILLANCE

NEWSLETTER Nº 2

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INTRO: ABOUT THE PROJECT

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 about the project:

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

RESULTS OF STAKEHOLDER CONSULTATION

In order to obtain further evidence from the market, the team has organised a **stakeholder consultation**, approaching in total 278 experts from suppliers, market surveillance authorities, test laboratories as well as consumer and environmental NGOs to gain evidence or further insight into circumvention cases and feedback to the preliminary ANTICSS definitions of circumvention and jeopardy effects.

In total, 38 organisations have provided their feedback and 39 “suspect” product cases have been reported. The ANTICSS project team analysed these cases in detail to assess their allocation to the categories ‘circumvention’, ‘jeopardy effects’, ‘non-compliant’ or ‘compliant’.

More:

www.anti-circumvention.eu/news-post/stakeholder-consultation



Horizon 2020 programme
Project acronym: ANTICSS
Project full name: ANTI-Circumvention of Standards for better market Surveillance

FINAL DEFINITION OF 'CIRCUMVENTION' AND 'JEOPARDY EFFECTS'

Feedback gained through the stakeholder consultation has also been taken into account to derive the final definitions of circumvention and jeopardy effects:

Circumvention

Circumvention is the act of designing a product or prescribing test instructions, leading to an alteration of the behaviour or the properties of the product, specifically in the test situation, in order to reach more favourable results for any of the parameters specified in the relevant delegated or implemented act, or included in any of the documentations provided for the product. The act of circumvention is relevant **only** under test conditions and can be executed e.g.

- a) by automatic detection of the test situation and alteration of the product performance and/or resource consumption during test, or
- b) by pre-set or manual alteration of the product, affecting performance and/or resource consumption during test or
- c) By pre-set alteration of the performance within a short period after putting the product into service.

Jeopardy effects

Jeopardy effects encompass all aspects of products or test instructions, or interpretation of test results which do not follow the goal of the EU ecodesign and/or energy labelling legislation of setting ecodesign requirements and providing reliable information about the resource consumption and/or performance of a product.

These effects may not be classified as circumvention, but become possible due to loopholes or other weaknesses.

More: www.anti-circumvention.eu/project-activities/definition-circumvention-and-its-impacts

PRODUCT CATEGORIES SELECTED FOR LABORATORY TESTING

Based on the project team's own knowledge, the analysis of legislation and expert studies, the cases of circumvention collected from stakeholders, the team has decided on **10 product categories to be tested** by the project's own testing capacities.

Selected were those product categories where cases of circumvention and/or jeopardy have been reported, representing a variety of product clusters: **electronic equipment, heating, cooling, and white goods.**

ENER 1	Space heaters
ENER 5	Televisions
ENER 10	Room air conditioning
ENER 13	Domestic refrigerators
ENER 13	Domestic freezers, refrigerators-freezers
ENER 14	Domestic dishwashers
ENER 14	Domestic washing machines
ENER 16	Household tumble driers
ENER 20	Solid fuel local space heaters
ENER 22	Domestic ovens

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

PRODUCT TESTING: PREPARATION OF ALTERNATIVE TEST PROCEDURES

The ANTICSS project will analyse in total 30 product types of the selected product categories via laboratory testing, benefiting from participation of highly experienced laboratories in the project consortium. ANTICSS will also develop alternative testing procedures with the aim to better detect and assess the impacts of possible circumvention in terms of effects on energy consumption and functional performance.

More information: www.anti-circumvention.eu/project-activities/test-methods-and-approaches

RELATION OF ,SMART' PRODUCTS AND CIRCUMVENTION

More and more products are promoted as 'smart', e.g. smart TVs, smart fridges, smart grids etc. Being equipped with internet connection, which is not only a means to update the device, they provide the possibility for remote control and offer additional functions to consumers. So called smart appliances have links to computing clouds, app controls, and can be upgraded with extra programmes. Sophisticated on-board controls facilitate increasing variety of functions, enable the product to respond to internal or external operating conditions and provide smoother and possibly more efficient processes.



The latest ANTICSS working paper 'Relation of smart products and circumvention' analyses if and how smart functions and their underlying operation principles might also be misused to alter the appliances' operating characteristics specifically during a test procedure. Main conclusions:

- Appliances with functions marketed as smart do not provide per se an indicator for circumvention.
- Products being able to act smart (= intelligent) in a way of circumventing under compliance testing are not necessarily marketed as smart.
- The act of software-related circumvention relevant only under test conditions can be executed either by automatic detection of the test situation and alteration of the product performance and/or resource consumption during test, or by pre-set alteration of the performance within a short period after putting the product into service.
- If some kind of 'intelligent' software is already implemented at the moment the product is placed on the market, those appliances might be more prone to use this software also for circumvention. On the other hand, if standard test conditions clearly differ from real-life conditions, also simple control logic might be sufficient to programme appliances in a way to recognize these test conditions and adjust certain parameters accordingly.
- Finally, not all 'smart appliances' are circumventing under EU Ecodesign and Energy label compliance testing: manufacturers would explicitly have to programme the appliances in a way to reach more favourable test results.

Document for download: www.anti-circumvention.eu/project-activities/definition-circumvention-and-its-impacts

EVENTS

2nd 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 24 June 2019, the second Advisory Board meeting has taken place, informing about the outcomes of the stakeholder consultation and discussing the final draft definitions and the selection of product categories for laboratory testing.

Members and more: www.anti-circumvention.eu/contacts/advisory-board

ANTICSS at EUSEW 2019

The ANTICSS, EEPLIANT2 and INTAS projects, which all focus on market surveillance of the EU energy efficiency requirements related to the energy label and ecodesign legislation, have presented their activities and findings at a joint EUSEW 2019 session on June 20, 2019 in Brussels.



Agenda: <https://eusew.eu/market-surveillance-more-capacity-and-clarity-more-impact>

ANTICSS at EEDAL 2019

ANTICSS will be presented at the 10th International Conference on Energy Efficiency in Domestic Appliances and Lighting (EEDAL'19), which will take place on 6–8 November 2019, in Beijing, China

More: <https://e3p.jrc.ec.europa.eu/events/10th-international-conference-energy-efficiency-domestic-appliances-and-lighting-eedal-19>

CONTACTS

Contacts to the project coordinator and the team: www.anti-circumvention.eu/contacts/team-and-contacts

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