



Deliverable D5 (D2.1):
ANTICSS Project
List of Products in Scope
(Decision matrix incl.
supplementary explanations)

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List of abbreviations

ED	ecodesign
EL	energy labelling
EIA	Ecodesign Impact Accounting
GWP	Global Warming Potential
WP	work package





1 About the ANTICSS project

ANTICSS objectives are to assess and define "circumvention" in order to achieve a better product positioning in relation to EU Ecodesign and Energy labelling legislation and relevant harmonised standards; including clear delimitation from other effects to facilitate unambiguous public communication. Its aims are also to collect, analyse and learn from cases of circumvention by literature research and dedicated expert interviews, as well as analysing existing EU Ecodesign (ED) and Energy labelling (EL) legislation and standardisation for possible loopholes. The potential relation between circumvention and "smart" products with specific embedded software is another issue addressed by the project. From these findings, conclusions how to better detect and prevent future circumvention will be derived; assessing impacts 'if' and 'how much' energy consumption and/or functional performance modifications could be ascribed to circumvention by conducting appliance testing. Project's further objectives are to define alternative test procedures or checklists with the aim to by-pass any possible measurement circumvention. Based on the results, ANTICSS will provide practical capacity building measures for key actors of market surveillance and test laboratories, support communication and collaboration platforms between major stakeholders and provide policy recommendations for policy makers and standardisation bodies to prevent future circumvention under EU Ecodesign and Energy labelling. ANTICSS project is also designed to provide reliability to manufacturers by specifying potentially vague legislation and standards which might be interpreted differently by market actors and some of them taking unfair advantages so far. By overall awareness raising on circumvention among stakeholders, ANTICSS is supporting an effective EU legislation enforcement and thus increasing acceptance and trust of market actors and civil society into the Ecodesign and Energy labelling legislation.

Starting from a full list of those product groups with applied EU Ecodesign and Energy labelling regulations, task 2.1 of work package 2 comprises the definition of the project's product scope. Main goal of this task is to take a first step in narrowing the scope in order to focus on product groups being probably relevant for circumvention and thus being further analysed in the subsequent task 2.5 (Analysis of legislation and harmonized standards for selected product groups) and work package 3 (Detailed preparation for the investigation of concrete circumvention cases). The final selection of product categories and types for laboratory testing takes place at the end of work package 3.

To narrow the scope, a matrix has been developed entailing a first proposal of decision criteria which have been presented and discussed at the kick-off meeting of the ANTICSS project (4th/5th of June 2018). In chapter 2 the finally applied decision criteria for the subsequent selection of product groups in scope are listed and explained.



2 Decision criteria for the selection of product groups in scope

For the following criteria, information on all product groups with applied EU Ecodesign and Energy labelling regulations has been collected in a separate excel matrix. In the coming months, this information will serve as basis to choose a preliminary range of product groups that shall be further examined in the subsequent tasks (especially task 2.5: Analysis of legislation and harmonised standards for selected product groups) and work package 3. The final list of products in scope will be due by end of January 2019.

2.1 Section “General information”

Some rather informative and descriptive information regarding the product groups is collected in these columns.

Column “Product category”

The product groups are subsumed under product categories; e.g. domestic refrigerators and freezers, dishwashers, vacuum cleaners etc. are categorised as “white goods”, to structure the variety of product groups and to enable covering different categories of product groups when narrowing the scope of the project.

Column “Lot abbreviation”

Each product group has an abbreviation which partly consists of the abbreviation of the responsible Directorates-General (DGs) of the EU Commission and a number (example: ENER 16 – household tumble dryers). This abbreviation helps to identify the product group in different contexts as the name of the product group sometimes differs.

Column “Product group”

A product group is defined through the respective ED and/or EL regulation.

In two cases there are product groups that are covered by different ED regulations but by the same energy labelling directive: light sources (three different ED-regulations, one EL-regulation) and local space heaters/solid fuel local space heaters (two different ED-regulations, one EL-regulation). These subgroups are combined in only one row. One reason is that the Ecodesign Impact Accounting (EIA, serving as source for the market and environmental relevance, see section 2.4) also does not differentiate between these subgroups. Another reason is, that, in case of lighting, the ED and EL regulations are currently under revision and the ED regulations shall be combined in the future.



In case of washing machines and washer-dryers, the products groups, that are currently covered by one ED regulation (for washing machines) and two EL regulations (washing machines and washer dryers), are also combined in one row as in the ongoing revision they shall be covered by the same ED and EL regulation.

Column “Domestic/non-domestic”

This column gives an indication if the product group covers domestic products (D) or non-domestic products (N). In some cases products for both target groups are included in the regulations (e.g. light sources, tyres, imaging equipment).

Column “Status (August 2018)”

As far as possible the status of the regulation process as of August 2018 is shortly described to see in what stage the product group is and if changes in the regulation can be expected soon. In the latter case the potential changes would need to be considered in the further tasks as e.g. in some cases loopholes might already be considered by updated measurement standards or revised ED or EL regulations. Another aspect is that regulations that are currently under revision might still be influenced by outcomes of ANTICSS whereas on the other hand existing products cannot be tested against regulations or standards which are not in force yet.

2.2 Section “Ecodesign”

Column “ED regulation”

Here the currently applicable ED regulation (including amendments) for the respective product group is listed. In some cases the product groups are covered by a voluntary industry agreement instead of an ED regulation, which is listed as well.

Column “Covered product types ED Regulation”

For further information the covered product types (i.e. the scope of the regulation) are given as in subsequent work packages a further selection of the specific product types and even models will take place.



2.3 Section “Energy label”

Column “EL regulation”

Here the currently applicable EL regulation (including amendments) for the respective product group is listed.

Column “Covered product types EL Regulation”

For further information the covered product types (i.e. the scope of the regulation) are given as in subsequent work packages a further selection of the specific product types and even models will take place.

In most cases the covered product types are identical for both ED and EL regulation. However there are also product groups where the scope is different. Also there are product groups which are only covered by an ED but not an EL regulation. This is mostly the case for industry applications (like motors, industrial fans, transformers etc.).

2.4 Section “Market and environmental relevance (source: EIA 2017)”

Market and environmental relevance of the product groups is one important criterion to select product groups which have a significant market and/or environmental relevance in order to achieve a possibly high impact through ANTICSS. A comprehensive source of indicators that can be used to quantify the market and environmental relevance is the Ecodesign Impact Accounting (EIA), a study commissioned by the European Commission to systematically monitor and report on the impact of Ecodesign, Energy Labelling, Energy Star and Tyre Labelling measures (Van Holsteijn en Kemna B.V. (VHK) 2017).

Information on the following indicators was taken from that study:

- Sales (in 2015 and 2020)
- Stock (in 2015)
- Primary energy consumption (in 2015)
- Savings (energy, GWP in 2020 and 2030)

The ten most important product groups in each of the indicators (i.e. highest sales, stock, consumption values or savings) are highlighted in blue in the excel matrix.



2.5 Section “Market and environmental relevance (other sources)”

As a redundancy to check the information gathered from the EIA also other sources were taken into account. Information on market and environmental relevance of the product groups was collected from

- EU website regarding energy efficient products (<https://ec.europa.eu/energy/en/topics/energy-efficiency/energy-efficient-products>)
- ED and EL regulations (information in recitals)
- VITO, in cooperation with VHK (2015): Preparatory Study on Light Sources for Ecodesign and/or Energy Labelling Requirements ('Lot 8/9/19'). Final report.

2.6 Section “Hints on circumvention”

All circumvention related information regarding the product groups is collected in this section.

Column “Covered by other EU research”

Many product groups have been or are covered by other EU research projects that deal or dealt with non-compliance or circumvention. For product groups covered by other EU or national research projects with focus on circumvention and/or market surveillance, project leaders have been contacted for clarification of overlaps or gaps to decide if these product groups will still be covered by ANTICSS. The following projects were identified:



Table 2-1: Related research projects

Short name and website	Status	Duration	Covered product groups
ATLETE www.atlete.eu	Finished	2009-2011	Refrigerators + freezers (80 models)
ATLETE II www.atlete.eu/2/	Finished	2012-2014	washing machines (50 models)
CompliantTV www.complianttv.eu	Finished	-2015	TVs
ECOPLIANT www.ecopliant.eu	Finished	2012-2015	Lighting, TVs, EPS, circulators, water pumps, motors, comfort fans.
INTAS www.intas-testing.eu/	Ongoing	2016-2019	Power transformers and industrial fans
EEPLIANT http://eepliant.eu/	Finished	2015-2017	LED lamps, imaging equipment (printers), and space heaters and combination heaters
EEPLIANT 2 http://eepliant.eu/	ongoing		domestic + professional refrigerators, network standby, LED, printers, heaters
NAPE / BAM https://netzwerke.bam.de/Netzwerke/Navigation/DE/Evpg/EVPG-Nape/evpg-nape.html	Ongoing	2016-2018	range hoods, tumble dryers, air conditioners, heat pumps
STEP http://eeb.org/closing-the-reality-gap/	Finished	2016-2017	TVs, refrigerators, dishwashers
MarketWatch https://ec.europa.eu/energy/intelligent/projects/en/projects/marketwatch	Finished	2012-2016	Fridges and freezers, wine storage appliances, washing machines, tumble driers, washer driers, dishwashers, ovens, range hoods, vacuum cleaners, air conditioners, TVs, lighting, standby and off-mode, electric oven
SELINA https://ec.europa.eu/energy/intelligent/projects/en/projects/selina	Finished	2008-2010	Standby and off mode



Column "Description of suspect behaviour"

In this column cases of suspect behaviour that has been collected by the ANTICSS project team in task 2.2 through a questionnaire are shortly described. Also project leaders of other EU or national research projects have been asked for further hints on circumvention.

Columns "Red, orange, yellow"

In task 2.2 a list of suspect behaviour categories has been compiled in order to classify the suspect behaviour described by the respondents. These categories were assigned to three levels of legality: red (illegal), orange (suspect behaviour to be further assessed) and yellow (conform, but nonetheless leading to differences between consumption or performance under standard versus real life conditions). The suspect behaviour cases were then classified into these categories. These three columns show to which level of legality the cases of suspect behaviour that has been collected in that specific product category were assigned to so far (version September 2018).

Only the red (circumvention, illegal) and orange level (suspect behaviour to be further assessed) will be taken into account for the further selection of products in scope; these cells are marked in orange. Note: In the further course of the project, further hints on circumvention might be added.

Column "Circumvention easy to be repeated?"

This criterion describes how easy it is deemed that the suspect behaviour encountered in the product category might be repeated. The easier it is the higher is the risk that the behaviour is shown by many of the products in that product group.

This column will be filled in on the basis of the information to be gathered in work package 3 (Detailed preparation for the investigation of concrete circumvention cases).

Column "Potential impact on consumers' trust / public or consumer awareness"

This criterion describes the potential impact of the suspect behaviour encountered in the product category on consumers' trust or public / consumer awareness. The higher the potential impact, the higher is the possible damage a single case might cause to the ED or EL legislation as a whole. One factor influencing the impact on consumers' trust might be if the product group is covered by an EL regulation or not, as the ED regulation only is not that visible to consumers as the energy label. Also industrial applications might have a lower impact on consumers' trust: they are not covered by EL regulation and there is no direct contact to consumers.

This column will be filled in on the basis of the information to be gathered in work package 3 (Detailed preparation for the investigation of concrete circumvention cases), especially task 3.3 (consumer views and experiences).



2.7 Section “Testing capabilities of test laboratories within the consortium”

In these four columns the testing capabilities of those test laboratories being involved as project partner within the ANTICSS consortium is compiled. The following test laboratories are within the consortium:

- LCOE (FFII. Laboratorio Central Oficial de Electrotecnia)
- IMQ (Istituto Italiano del Marchio di Qualità)
- VDE (VDE Prüf- und Zertifizierungsinstitut GmbH)
- Re/genT

Available testing capabilities are marked in light green.

2.8 Section “Comments”

Comments regarding any of the above mentioned categories.



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List of project partners:

Italy: ENEA- Agenzia nazionale per le nuove tecnologie, l'energia e lo sviluppo economico sostenibile

Austria: AEA - Österreichische Energieagentur

Italy: CCIAA Mi - Camera di commercio industria artigianato agricoltura

Spain: FFII – LCOE - Fundacion para el fomento de la innovacion industrial

Spain: CM - Comunidad de Madrid

Czech Republic: SEVEN - SEVEN, the Energy Efficiency Center, z.u.

Czech Republic: SEIA - Státní energetická inspekce

EU / Belgium: ECOS - European Environmental Citizens Organisation for Standardisation

Belgium: BHTC - Service public fédéral santé publique, sécurité de la chaîne alimentaire et environnement

Germany: GRS - Regierung von Schwaben – Gewerbeaufsichtsamt

Germany: UBONN - Rheinische Friedrich-Wilhelms-Universität Bonn

Austria: BMWFV - Bundesministerium für Wissenschaft, Forschung und Wirtschaft

Italy: IMQ - Istituto Italiano del Marchio di Qualità S.p.A.

Germany: VDE - VDE Prüf- und Zertifizierungsinstitut GmbH

Netherlands: Re/gent - Re/gent B.V.

Netherlands: NVA - Nederlandse voedsel en warenautoriteit

Portugal: ADENE - Adene-agencia para a energia

Portugal: ASAE - Autoridade segurança alimentar e economica



3 List of literature

Van Holsteijn en Kemna B.V. (VHK) (Hg.) (2017): Ecodesign Impact Accounting – status report 2017. Prepared by VHK for the European Commission, zuletzt geprüft am 28.09.2018.

VITO, in cooperation with VHK (Hg.) (2015): Preparatory Study on Light Sources for Ecodesign and/or Energy Labelling Requirements ('Lot 8/9/19'). Final report., zuletzt geprüft am 28.09.2018.

