The topic of manipulated testing results, or ‘circumvention’ is currently exposed to the highest attention of the public and media, not only for the emission of cars (‘dieselgate’) but also with regard to other EU legislation. For this reason the project ANTICSS – Anti-Circumvention of Standards for better market Surveillance has been funded by European Union’s Horizon 2020 research and innovation programme. Its objectives are to define and assess ‘circumvention’ in relation to EU Ecodesign and Energy labelling legislation and their harmonised standards.

ANTICSS aims at setting a clear delimitation of circumvention from other effects to facilitate unambiguous public communication and to provide guidance on how to better detect and prevent circumvention in future EU legislation and standards. The project’s further objectives are to define alternative test procedures or checklists with the aim to identify and tackle any possible measurement circumvention.

ANTICSS is designed to provide
- practical capacity building measures for key actors of market surveillance and test laboratories
- support communication and collaboration platforms between major stakeholders
- 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
- policy recommendations for policy makers and standardisation bodies to prevent future circumvention

By raising awareness on possible 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.

What product categories are being investigated?

The project generally focuses on all products regulated by the EU Ecodesign and Energy label legislation: household appliances, information and communication technologies, lighting and others. The final selection of categories to be investigated in depth will be done on the basis of information gathered within the first stages of project research.

What kind of possible circumvention means will be analysed by the project?

The non-exhaustive list below includes topics that are addressed in order to establish a common understanding of what ‘circumvention’ is:
- hidden software (defeat devices)
- (hidden) specific cycle/setting/configuration used only for testing for legislation compliance
- products specifically designed to be excluded from legislation
- ambiguities (such as unclear definitions, boundaries) and loopholes in legislation
- deviations in testing condition(s), allowed or due to possible different interpretation of standard clauses
- exploiting a weakness in the test procedure’s method for addressing measurement uncertainties
- decouple measurement of energy consumption and functional performances
- smart appliances embedded software: the challenge is how to identify ‘useful’ energy saving automatic functions/sensors and connectivity from ‘circumvention-targeted’ sensors/functions/software.
What are the expected project results?

The **ANTICSS** project team will draw recommendations for policy makers and standardisation bodies on how to identify circumvention practices through laboratory testing and to prevent circumvention risks, thus allowing preparing better circumvention-proof standards and legislation before adoption. In this respect guidelines on ‘How to detect and avoid circumvention of Ecodesign and Energy labelling legislation and standards’, will be prepared and target economic and non-economic market actors and MSAs for a more effective EU legislation enforcement.

The project will support in many ways the increase of confidence among purchasers, manufacturers and retailers:

- By setting a clear definition of circumvention delimitating it from other effects, thus facilitating unambiguous public communication
- By providing methodologies for detecting cases of circumvention, and providing Market Surveillance Authorities with tools for its identification during market surveillance actions
- By supporting the optimization of standards and legislation in order to prevent circumvention
- By supporting communication and collaboration platforms between major stakeholders
- By providing reliability to manufacturers through specifying potentially vague legislation and standards which might be interpreted differently by various market actors and some of them taking unfair advantages so far.

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