



ANTICSS

ANTI-CIRCUMVENTION OF STANDARDS
FOR BETTER MARKET SURVEILLANCE

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 ('dieseldate') 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.

The **ANTICSS** project objectives are to define what 'circumvention' is, and to assess if it has been used in order to achieve a better product positioning in relation to the EU Ecodesign and Energy labelling legislation and relevant harmonised standards.

ANTICSS aims to collect and learn from cases of circumvention by literature research, dedicated expert research and interviews; in addition, existing EU Ecodesign and Energy labelling legislation and standards will be analysed for possible loopholes and ambiguities to be exploited by economic market operator for achieving a benefit over the competitors, and finally suspects of circumvention habits will be confirmed through laboratory testing of selected products. Product testing will be also important for assessing the potential circumvention impact: that is 'if' and 'how much' energy consumption and/or functional performance modifications could be ascribed to circumvention instead that to legislation driven technological improvements.

ANTICSS aims at setting a clear delimitation of circumvention from other effects to facilitate unambiguous public communication and to provide guidance on how better detecting and prevent circumvention in future EU legislation and standards. Project's further objectives are to define alternative test procedures or check lists with the aim to identify and by-pass any possible measurement circumvention.

ANTICSS project 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 overall awareness raising 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 are the ANTICSS project key objectives?

ANTICSS objectives are to assess what 'circumvention' actually is and how the EU Ecodesign and Energy labelling legislation and relevant harmonised standards can be circumvented in order to achieve a better product positioning. Its objectives are also to understand 'if' and 'how much' energy consumption and/or functional performance modifications could be ascribed to circumvention; and 'how' circumvention attempts could be unmasked via the definition of new specific procedures or check lists, modified test conditions, 'sentinel' parameters to be screened, etc.



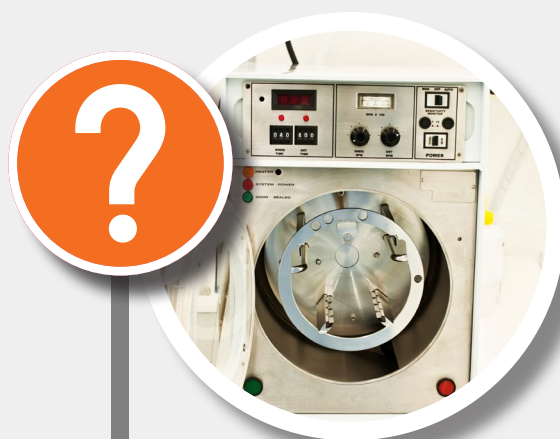
What scope of activities ANTICSS project organises?

ANTICSS firstly aims to define what circumvention is in relation to EU Ecodesign and Energy labelling legislation and relevant harmonised standards. It then investigates how they can be circumvented in order to achieve a better product positioning. The project team collects and discusses evidence on potential circumvention cases, following up with a limited number of laboratory testing of selected product models along with engineering analysis to confirm the circumvention and assess its impact on products' energy efficiency and functional performance.



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.



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

The **ANTICSS** methodology is simple but effective: Elaboration of a detailed definition of what 'circumvention' is, to distinguish it from other effects and thus to facilitate unambiguous public communication.

The non-exhaustive list below includes topics that are addressed in order to assess the meaning of 'circumvention':

- 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
- actual performances (energy consumption/functional performances) vs. standard cycles/duty cycles
- 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 overall project results?

ANTICSS project team will draw recommendations for policy makers and standardisation bodies on how to identify circumvention habits 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 targeted to all market economic and non-economic 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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PROJECT PARTNERS



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