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Public Comment:

On the European Commission's Update of the governance of the Energy Union and Climate Action

With support from:

Introduction

75inQ welcomes the Commission's initiative in reviewing the governance of the Energy Union and Climate Action. We find that the entire area of law overlooks the distributional impacts of both the climate crisis and the energy transition on women. We deplore the lack of gendered measures within the framework of the EU energy transition and of its governance. We strongly support the EU initiatives that enable Member States to meet their NECPs, yet they will have detrimental social effects on female EU citizens, if not accompanied by gender-mainstreaming measures. The energy transition will necessarily produce distributional social impacts, however gender equality should not suffer from it, as such effects can easily be avoided. 75inQ believes in an inclusive energy transition that will only be engendered by diversity. The absence of such a gender dimension in the current framework includes, but is not limited to, the following points.

Comments

First and foremost, the gender dimension of a just and inclusive energy transition is not currently defined. Civil society actors, policymakers, and academics have been affirming that the energy transition will disproportionately affect women. Not only will it affect them disproportionately, but also differently than their male counterparts, whether it is at the consumer or the (energy) professional level.[1]

This inequality has great significance for the governance and implementation of the energy union. For example, female energy consumers cannot be held to the same standard of energy sobriety as their physiological needs differ from those of a man.[2] Female energy consumers cannot be expected to make the same investment in retrofitting their homes, as female-led households are systematically less wealthy than those led by men. Female energy professionals are more exposed to job loss from the transition as they are, on average, less familiar with and less educated on the tools that will accompany it (eg. overall digitalisation, AI).[3] It is surprising and inadequate that the frameworks governing a just energy transition do not explicitly address such inequalities.

In fighting energy poverty, our current frameworks also do not define gendered energy poverty. It is again well documented that women are overly affected by the phenomenon. They both are overrepresented in energy-poor households, but are in any case also further affected by the real- life consequences of it.[4]

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[1] Dr. Feenstra, M. (2025) Reframing Energy Poverty through a Gender Lens; Ren, X., & Clarke, A. (2025). Shifting Currents of Power: Navigating Gender Inequalities, Internal Networks, and Diversity and Inclusion Policy Effectiveness in an Energy Sector Workplace. *Gender, Work & Orgthe ,nization.*; Dickerson, M. S. (2015). *A case study of four female electrician technicians in a male-dominated occupation*. University of South Florida.; Agnihotri, A., & Bhattacharya, S. (2025). *Power Solutions: Sustainathat ,thatly and Inclusively Combatting Challenges of Gender Gap in A Highly Male-Dominated Trade Sector*. SAGE Publications: SAGE Business Cases Originals.

[2] Dr. Feenstra, M. (2025) Reframing Energy Poverty through a Gender Lens; Ren, X., & Clarke, A. (2025). Shifting Currents of Power: Navigating Gender Inequalities, Internal Networks, and Diversity and Inclusion Policy Effectiveness in an Energy Sector Workplace.

[3] *AI's Missing Link : The Gender Gap in the Talent Pool*. (s. d.). Interface. https://www.interface-eu.org/publications/ai-gender-gap

[4] Dr. Feenstra, M. (2025) Reframing Energy Poverty through a Gender Lens.

That lack of definition is completed by a lack of reporting. Member states are asked to report on their share of households in situations of energy poverty. They are, however, not obligated to document or to assess it by gender. The lack of gender-dissegregated data in the energy sector invisibilises the inequality present within it. The lack of gender-disaggregated data in the energy sector also makes the work and advocacy of policymakers, NGOs, and academics more difficult when trying to alleviate such differences.

In a cascade reaction, the impact of the energy poverty alleviation measures is not assessed with due regard to the gender component that affects the phenomenon. There is no way to properly assess whether associated measures equally alleviate the situation of male and female-led households in situations of energy poverty.

Still on the matter of producing gender-disaggregated data, the employment impacts of the energy transition are not being assessed with due regard to gendered inequality. Women are less likely to be able to redirect their careers and have less space to take part in the new training necessary for the evolving skills needed in the energy sector. Here again, while one can safely affirm that these will cause increasing inequality in job access and retention, member states and companies are not forced to produce gender disaggregated data, which would support the claim.

On the matter of involving civil society in the elaboration of the energy transition, no effort is made to produce representative samples of the population. The populations in situations of energy poverty must be involved in the legislative processes aimed at alleviating their condition.

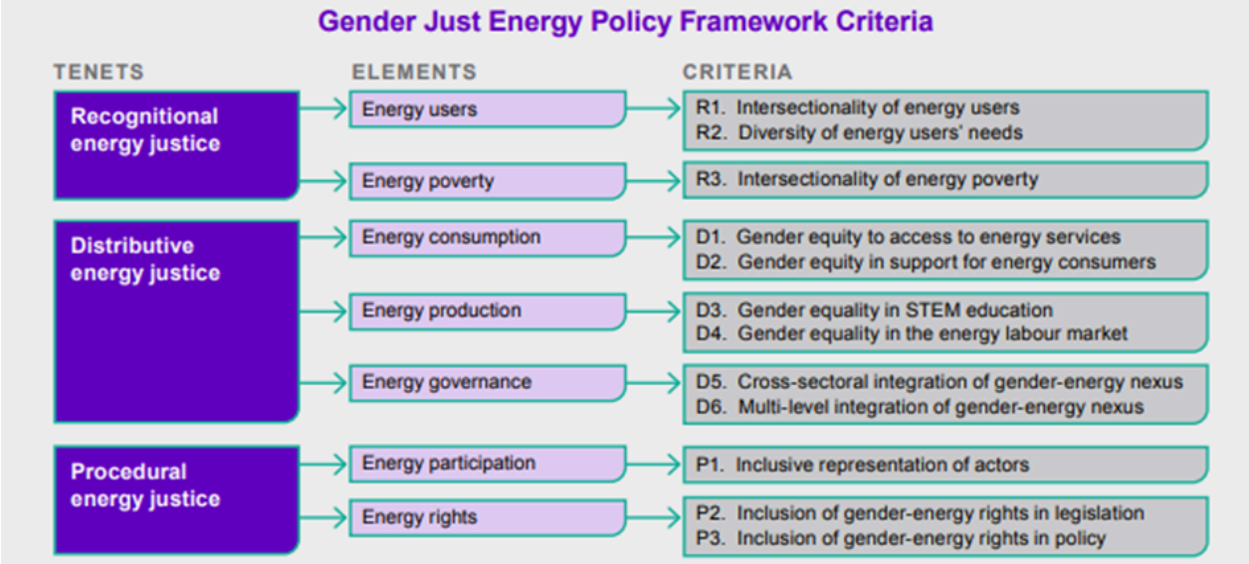
Overall, the gender-mainstreaming component of Article 8TFEU remains horizontal in application. In the energy sector, the concept of gender-mainstreaming is not operationalised in energy governance.

Professionals in the sector have come up with detailed frameworks on reaching gender-inclusive levels of energy policy. They outline three levers to transform EU energy policy into an inclusive energy policy.

1. **Addressing the lack of gender (and) disaggregated data that limits the knowledge transfer between actors in the energy system and policymakers.**
2. **Addressing the dominant gender-biased and gender-blind norms of the current sociotechnical energy system impacts the mindset of policymakers and designers.**
3. **Addressing users' perceptions in policy making and technology design, otherwise leading to non-inclusive interventions that might increase existing inequalities in society.**[5]

The diagram below explains such criteria in more detail.

[5] Feenstra, M. (2025) Gender Just Energy Policy – Policy Brief, 75inQ



(Users TCP Gender & Energy Task, 2025)[6]

Suggestions

Concrete first steps can be given to drive the governance of the Energy Union and Climate Action towards a gender-just policy.

1. **To include clear intentions towards gender-mainstreaming in the energy governance framework**
    a. **Include a clear statement on the matter in the recitals**
    b. **Include clear definitions of gendered energy inequality in the recitals**
2. **To enable and compel clear reporting of gendered distributional impacts**
    a. **Include a clear obligation to produce gender disaggregated data in reporting on energy poverty**
    b. **Include a clear obligation to produce gender disaggregated data in reporting on the efficiency of energy poverty alleviating measures, such as the Affordable Energy Act**
    c. **Include a clear obligation to produce gender disaggregated data in reporting on the job market evolution of the energy sector**

About 75InQ:

The 75inQ foundation works to accelerate the transition to sustainable energy by promoting gender equality in line with the Sustainable Development Goals developed by the United Nations. The Dutch foundation conducts research, awareness campaigns, community outreach, and facilitation to pursue these objectives. 75inQ focuses on SDG7 and SDG5 by accelerating diversity in the energy sector towards a more inclusive and sustainable energy transition. 75inQ has an active community of 1400 female professionals in the energy sector.

[6] Feenstra, M. (2025) Gender Just Energy Policy – Policy Brief, 75inQ