

75inQ Public Comment:

A Citizens' Omnibus Initiative

Introduction

75inq welcomes the Commission's initiative to gather insights regarding a potential Citizen's Omnibus Initiative. 75inq has vested interests in potential simplifications that would affect energy consumer rights and DEI reporting obligations. Further Omnibus simplifications can either hurt or alleviate the condition of the female energy consumers and professionals represented by our organisation. On the one hand, 75inq supports this initiative which could seek to harmonize energy consumer rights, where the harmonisation does not constitute a race to the bottom. On the other hand, 75inq expresses deep concern about the overall simplifications of reporting obligations that usually occur within Omnibus Package legislative pieces.

Comments

Consumer Rights Harmonisation

75inq supports the harmonisation of consumer rights across the European Union. That is, especially as certain jurisdictions offer restrictive protection to their citizens,¹ and as no national piece of legislation across EU jurisdictions factors in gender as a supplementary indicator of energy poverty.

Research shows that women in situations of energy poverty are further affected by its consequences than their male counterparts. For example, having to choose between essential energy services is more detrimental to the health of older women than to the health of other men, as women are more likely to be affected by cold shocks or heat stress.² Further, female-led energy-poor households are more likely to have dependent relatives be part of their households.³ This means a trickle-down effect occurs where

¹ Hasheminasab, Hamidreza, Dalia Streimikiene, and Mohammad Pishahang. "A novel energy poverty evaluation: Study of the European Union countries." *Energy* 264 (2023): 126157.

² Dr. Feenstra, M. (2025) Reframing Energy Poverty through a Gender Lens

³ Rallu, J. L. (2017). *Estimating numbers and poverty status of female household and family heads*. *Revista de Historiografía*, 26. <https://e-revistas.uc3m.es/index.php/REVHISTO/article/download/3708/2314/>

underage, elderly, or sick relatives who are more vulnerable to energy poverty by essence, are more likely to be affected by it.

In harmonising the rules regarding energy consumer rights and therefore including the rights of those in situations of energy poverty, the EU has the opportunity to generalise definitions of energy poverty and consumer vulnerability that factor in gender as a feature of vulnerability and allow for proper attention to be given to those most exposed and at risk. On the other hand, the risk of harmonising such rules could also be a leveling down of standards of protection in Member States that apply higher standards than the EU average.

Reporting obligations

Second, 75inQ emphasises the importance of avoiding that simplification, especially regarding reporting obligations, which lead to an invisibilisation of existing inequalities. In the sector of energy, for example, the collection of gender-disaggregated data is crucial to alleviate the differentiated needs of men and women. Where inequality is not quantified formally, it becomes harder to advocate for, harder to mitigate, and harder to research. Policymakers, academics and advocacy groups have consistently argued for an increase in the collection of gender-disaggregated data to achieve gender equality.⁴ In energy matters, the collection of such data in the EU is close to non-existent, and therefore quantitative studies on gendered energy poverty in the EU remain extremely scarce compared to those conducted in other countries such as India or China.⁵ The simplification of EU rules, and the alleviation of administrative burdens can sometimes lead to the deletion of social reporting obligations that are considered ancillary.⁶ Yet, as explained regarding the collection of gender-disaggregated data, the reporting obligations of Member States should increase. I75inQ urges the Commission to ensure that reporting obligation simplifications do not contribute to the invisibilisation of existing inequalities.

⁴ Zhang, Lin, and Saska Petrova. "Quantifying gender in energy poverty: A critical review of data, methodologies and contextual constraints." *Renewable and Sustainable Energy Reviews* 225 (2026): 116178.; European Commission. "Gender Equality Mainstreaming," n.d. https://commission.europa.eu/strategy-and-policy/eu-budget/performance-and-reporting/horizontal-priorities/gender-equality-mainstreaming_en ; Dr. Feenstra, M. (2025) Reframing Energy Poverty through a Gender Lens

⁵ Lin Zhang and Saska Petrova, "Quantifying Gender in Energy Poverty: A Critical Review of Data, Methodologies and Contextual Constraints," *Renewable and Sustainable Energy Reviews* 225 (August 8, 2025): 116178, <https://doi.org/10.1016/j.rser.2025.116178>.

⁶ Scope, "ESRS S1 After Omnibus: Own Workforce Reporting Under the Amended ESRS (2026)," Coolset, January 22, 2026, <https://www.coolset.com/academy/esrs-s1-requirements-own-workforce>.

Suggestions

In this context, 75inQ suggests that the act explains the following:

1. That the harmonisation of energy consumer rules be based on the highest national standard in force for each right (eg. France for disconnections)
2. That the potential reporting obligation simplification does not include the deletion of any gendered indicator

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.

