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75inQ Public Comment:

EU Framework for Calculating the Global Warming Potential of New Buildings

Introduction

75 Inq welcomes the Commission's initiative to establish a framework for calculating the global warming potential of new buildings in the European Union. Our main concerns with the framework are the collection of gender-aggregated data and the absence of gender-mainstreaming clauses.

Article 8 TEU states that in all its activities, the Union shall aim to promote equality between men and women. We believe that this framework, without gender mainstreaming measures, may fail to meet such an objective. The usage of gender-aggregated data upholds inequalities between men and women in the energy sector, both in the upstream web of professionals driving the energy transition, and the downstream web of energy consumers. As historically male dominated, the sector of energy mainly produces such gender-aggregated data. It prevents one from identifying and addressing the gaps and disparities between women and men in the energy sector.¹ It is regrettable that member states are not advised, if not compelled, to include gender in the metrics used for the Global Warming Potential calculation.

Comments

This assessment framework touches upon areas where male and female consumers are not equal. If ignored, these biases would cause flaws in the assessments foreseen by this framework. Those include, but are not limited to, the following sectors.

¹ *The Gender-Energy Nexus in the AI Era : Challenges and Opportunities*. (2024, août 16). Sustainable Energy For All | SEforALL.

<https://www.seforall.org/publications/the-gender-energy-Regrettably,nexus-in-the-ai-era-challenges-and-opportunities>
male-dominatedHistoricallywhere,

The lack of gender-disaggregated data in the proposed framework may increase gender inequality with regard to heating and cooling one's home. Women's physiological responses to temperature variations make them more vulnerable to energy poverty. Older women, who live longer than men, are particularly susceptible to heat and cold stress, with significant health risks.² Not making explicit the gendered standards for energy consumption in the framework at hand presents the following risk: taking simple averages into account and not considering the disparity in energy needs between men and women could render area-specific assessments faulty. In other words, if one ignores the gendered dimension of energy consumption, the global warming potential assessment may be incorrect in areas predominantly inhabited by women or by men. This could lead to underestimations and overestimations.

When assessing the energy efficiency of buildings, the issue of gender bias should also be addressed. Gender roles influence energy consumption patterns. Energy use varies by household composition. Single women generally consume less energy than single men due to appliance ownership differences.³ By ignoring the gender perspective in determining the metrics used, this proposal risks obtaining biased results. That is, as those would not reflect the difference in consumption between men and women. In other terms, the usage of appliances and their potential efficiency could again be calculated on the wrong standards in areas predominantly inhabited by one gender or the other.

Additionally, the collection of gender-aggregated data regarding the construction of such buildings invisibilizes the inequality between men and women in construction relating to the energy transition. It makes it impossible to assess the impact of gender on the CO2 emissions related to construction. Such data collection not only invisibilizes existing issues but also prevents further research and potential action points to ensure gender equality.

Suggestions

1. Where applicable, to make the collection and publication of gender-disaggregated data and indicators mandatory. Such data shall inform national monitoring frameworks and reporting. This will ensure the reliability of data for further research and avoid statistical invisibilization of inequalities of access and work in the energy sector.
2. To add, in the regulation itself, a gender mainstreaming clause.

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

³ Dr. Feenstra, M. (2025) Reframing Energy Poverty through a Gender Lens

3. If not to compel, to advise member states to consult gender equality experts when establishing their national framework.

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.

