

75inQ Public Comment:

Energy efficiency – labelling requirements for space and combination heaters

Introduction

75inQ welcomes the Commission's initiative in reforming the ecodesign labeling of space and combination heaters. In the interest of a prompt and just energy transition, it is important that consumers are provided with transparency on the appliances they purchase and their environmental impact. We believe the assessment of the heaters at hand however remains opaque, especially with regard to gendered biological needs for heating and cooling.

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. 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 Regrettably, member states are not advised, if not compelled, to include gender in the metrics used for labelling.

Comments

Research shows women physiologically require different temperatures than men do. Between others, older women, who live longer than men, are particularly susceptible to heat and cold stress, with significant health risks.² This means the standard energy consumption of a woman differs from that of a man.

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>

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

The efficiency of heating appliances is calculated based on their performance for a certain standard of consumption. The aforementioned biological difference between male and female consumers hints towards the fact that such an average standard of heating would differ between the two populations.

Therefore, transparency is needed in knowing to what standard an energy-consuming appliance is assessed. The eco-labeling calculations base themselves on a reference annual heating demand rate. The origin of this subjective rate is neither given in the regulation nor in the new draft act. Yet, this yearly reference rate could greatly change the efficiency result of the appliances measured.

Our concern is quite straightforward: Are these calculations based on the reference rate of a man or on that of a woman?

At the moment, the European Product Registry for Energy Labelling does not provide such information. At best, this means a representative sample of the European population was used, meaning the mean between the temperature needs of 51% women and 49% men. The most likely option is that the data used for assessment is already gender-aggregated and thus does not allow them to distinguish between the consumption needs of a woman compared to those of a man. Another possibility is that the sample of energy consumption data is neither representative nor disaggregated. At worst, the reference rate picked is none of the above, and is simply subjectively picked.

In any case, women are deprived of choice between energy appliances that may not be as energy-efficient when catering to women as when catering to men. This comes to enhance the economic inequality suffered by women as energy consumers. Not only are they more affected by the prices of energy,³ but also they are not able to pick efficient appliances.

Suggestions

Therefore, the 75inQ foundation suggests the following modification be made to the eco-label assessment of heating appliances:

1. The assessment should use gender disaggregated data in determining the variable of standard consumption reference
2. Separate the analysis of an appliance's efficiency between its efficiency for a standard male's and a standard female's consumption
3. Where relevant differences are observed in the rating of an appliance based on this criterion, issue two separate ratings accordingly
4. Let consumers consult these assessments in a manner that is straightforward and legible

Additional comments

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

The scope of the activities undertaken by 75inQ does not encompass the following comment, but the point remains important to be made.

The eco-labelling of energy-consuming appliances is a great idea but the aforementioned opacity of the standard of calculation has consequences beyond gender inequality. Household usage of a heater does not only depend on household composition but also on their geographical location. A European consumer residing in Norway and one residing in the south of Spain do not exhibit the same consumption patterns. Picking the consumption rate of one or the other as the standard reference may greatly change the energy rating of a specific appliance. The eco-labeling design scheme would greatly benefit from more precision and categorization.

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.

