

75inQ Public Comment:

Energy efficiency – legal framework after 2030

Introduction

75inQ welcomes the Commission's initiative in reforming the EU framework for energy efficiency. In addition to the energy transition, EU citizens, companies and organisations must make better use of the energy produced. 75inQ believes that measures that support and mandate increased energy efficiency are necessary to prompt private individuals to change their consumption habits. The call for evidence states that no effects on equality are expected from the policies that will stem from this field of law. However, 75inQ is concerned with the fate of energy-poor households in these contexts, if their specific situation is not addressed directly. Second, 75inQ is concerned with the inclusion of gender-tailored measures regarding the required efficiency standards and the disadvantageous impact they may have on women.

Comments

75inQ would like to stress that some measures encompassed by the energy efficiency goal of the European Union may overly disadvantage women as energy consumers compared to their male counterparts.

Policies aiming to increase energy efficiency usually include home-retrofitting or efficient appliance change incentives and regulations. In such a context, it is important that the relevant authorities consider the supplementary cost incurred by energy-poor households. Women and women-led households are more likely to be in situations of energy poverty.¹ In parallel, women-led households in situations of energy poverty spend a higher share of their revenues on energy.²

In short, retrofitting-incentivising measures will have larger impacts on women's finances. Due to the gendered income gap, women might have lesser means to invest in retrofitting and energy efficiency

¹ Habersbrunner, K., Noreña Ospina, M., Wieser, P., Kuschan, M., & Reichmann, F. (2024). *Study on gender-disaggregated data on Energy Poverty Final Study Report* Katharina Habersbrunner, Marcela Noreña Ospina, Pia Wieser, Marika Kuschan, Franziska Reichmann. European Economic and Social Committee.

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

Further, women in situations of energy poverty would be more affected as the share of their revenues dedicated to energy spending is already larger than that of the rest.

The consequences of energy poverty themselves also affect women more than they affect men. Research shows that women's physiologies require different ambient temperatures than those of men. Especially older women are more exposed to heat and cold stress, which can have very serious health consequences.³

In such a situation, it is very important that policies elaborated for 2030 contain proper gendered energy poverty targeting measures and subsidies that correct the current inequality between men and women as energy consumers. It is also important to consider that monoparental families and families with dependent relatives are often female-led households. Not putting in place targeted measures would expose these vulnerable groups to the consequences of energy poverty even further.

Second, efficiency measures usually entail the calculation of efficiency standards for appliances themselves. The methodology for tools such as ecolabelling remains very opaque. In order to establish the efficiency of an appliance, one must base themselves on a standard consumption. As research shows and as explained above, women and female-led households consume energy differently, therefore their consumption standards are not the same as that of men. The European Product Registry for Energy Labelling does not provide information on the calculation methodology nor on what consumer profile the standard consumption calculation is based on. By keeping such opaque standards, different consumer groups are prevented from choosing appliances that are really most efficient at their consumption levels.

Something that is also relevant in that sense is the fact that the consumption differences between geographical locations in the European Union are also not accounted for. It is for example not realistic nor rigorous to use the same consumption standard as an efficiency metric for a water heater that could be used either in the south of Spain or the north of Sweden.

Suggestions

On the matter of energy poverty in the context of home retrofitting, the 75inQ foundation suggests that:

1. The relevant provisions, if established, protect energy-poor households, and specifically female-headed households
 - a. By establishing flexibilities targeted to that group
 - b. By establishing subsidy schemes targeted at that group

On the matter of the energy efficiency labelling of appliances, the 75inQ foundation suggests that:

1. The assessment should use gender-disaggregated data in determining the variable of standard consumption reference

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



2. The assessment standards used should be made transparent in the variables and assumption chosen for calculation
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

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.

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