



# 75inQ Public Comment:

## *Energy reporting – amended templates to reflect European Green Deal outcomes and simplification*

### *Introduction*

75inQ welcomes the Commission's initiative in seeking feedback from stakeholders on the amended templates for energy reporting. 75inQ deplores the lack of attempt in this draft to collect gender-disaggregated data. Article 8 TFEU requires that gender equality be addressed in all EU actions. The European Commission, itself, recognised the crucial role of gender-disaggregated data in informing policies that aim to achieve gender equality.<sup>1</sup> Given that the energy sector unequally affects male and female consumers, it is surprising to see gender absent as an indicator.

In the energy sector, the collection of gender-disaggregated data is crucial for different reasons. It is crucial to produce policies that do not overly disfavor women, whose consumption patterns notoriously differ from those of men.<sup>2</sup> This collection is also crucial to map the share and needs of female consumers in situations of energy poverty, as this type of poverty is again notoriously known to affect female-led households more harmfully than it affects male households.

Collecting such information would allow policymakers, NGOs, research institutes and interest groups to properly assess the situation of women as energy consumers and propose fully informed and efficient policy measures to address the subject of gender inequality for energy consumers.<sup>3</sup> This Annex draft does not address such issues at all despite the fact that it could represent a uniquely fortunate opportunity to ensure disaggregated data collection.

In more detail below, one can find the specific existing collection sections that could be

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<sup>1</sup>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](https://commission.europa.eu/strategy-and-policy/eu-budget/performance-and-reporting/horizontal-priorities/gender-equality-mainstreaming_en)

<sup>2</sup>Toro, F., Serrano, M., & Guillén, M. (2019). *Who pollutes more? Gender differences in consumption patterns*.  
<https://diposit.ub.edu/bitstreams/be62de1f-992a-4eb1-8d20-452468125c97/download>

<sup>3</sup>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](https://commission.europa.eu/strategy-and-policy/eu-budget/performance-and-reporting/horizontal-priorities/gender-equality-mainstreaming_en),



amended to ensure the proper collection of gender-disaggregated data, as well as the rationale behind the collection of each data point.

### *Comments and Suggestions*

In the objective to pursue the aforementioned progress, 75inQ highlights the following opportunities for the collection of gender-disaggregated data in the draft annexes.

#### ANNEX 1 – Table 6, Table 7

**Rationale:** The two tables relate to reporting obligations on Member States regarding consumption tracking. Female-led households consume, on average, higher levels of energy than those with men. That is due in part to their higher physiological need for temperature control through heating and cooling appliances.<sup>4</sup> Further, female-led households constitute the majority of monoparental households as well as the majority of households with dependent relatives.<sup>5</sup> Therefore, beyond being further affected than their male counterparts by energy poverty, their exposure to such risks implies the exposure of further vulnerable groups such as elderly dependents, or children whose life trajectory and education may be affected by energy poverty at an early age.

It is therefore crucial to put numbers on the share of female-led energy-poor households, specifically in the context of the energy transition and objectives of energy efficiency. While 75inQ supports the development of a Just and Prompt energy transition, it is clear that the upfront costs associated with new energy sources could be suffered by households, and more critically, those in situations of energy poverty, without proper protection.<sup>6</sup> On the other hand, and for the matter of efficiency, as more and more appliances are classified in degrees of efficiency, many doubts appear with the standard used to calculate such efficiency. The collection of gender-disaggregated data here would allow one to properly inform such efficiency labelling depending on the gender and household composition of the user. In previous submissions, 75inQ has pointed towards the fact that the current efficiency labelling methodologies make no mention of the different types of final energy consumers in their assessment.

**Suggestion:** 75inQ suggests that the reporting obligations provided for in ANNEX 1, Tables 6 and 7, make a clear distinction between male- and female-led households in its data collection methodology, making it therefore mandatory for Member States to report separately on both groups.

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<sup>4</sup> Dr. Feenstra, M. (2025) Reframing Energy Poverty through a Gender Lens

<sup>5</sup> 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/>

<sup>6</sup> Faiella, I., Lavecchia, L., & Miniaci, R. (2022). *Household energy poverty and the “Just Transition”*. In *Handbook of Labor, Human Resources and Population Economics*. [https://www.research.unipd.it/bitstream/11577/3428335/1/20\\_01\\_2022\\_Handbook\\_RM\\_PV\\_LL\\_IF.pdf](https://www.research.unipd.it/bitstream/11577/3428335/1/20_01_2022_Handbook_RM_PV_LL_IF.pdf)



### ANNEX XI – Table 1

**Rationale:** Table 1 prescribes that Member States track the number of households in situations of energy poverty. Extensive literature on the topic shows that the effects of gendered energy poverty are disproportionately tough on women.<sup>7</sup> However, it is still impossible to track the number of female-headed households in situations of energy poverty, because no gender-disaggregated reporting is done on the matter.

To establish policies aimed at alleviating the situation of the female, energy-poor consumer group, it is necessary to know what share of the population they constitute, whether it is to design the policy or to assign a budget to it.

This would, in turn, help alleviate the inequality women suffer in the face of energy poverty, but also alleviate the situation of vulnerable dependent relatives, who usually stay with women.

**Suggestion:** 75inQ suggests that ANNEX XI, Table 1 separate the reporting obligations for households in situations of energy poverty between male and female-led households, therefore making it mandatory for Member States to report separately on both groups.

### ANNEX XI – Table 2

**Rationale:** The second table regards reporting obligations concerning national indicators in relation to energy poverty. For the same reasons cited above, this table could also be the one to mandate for national data collection regarding women in situations of energy poverty, and the share they represent in the national population, as well as within the population of households in situations of energy poverty

**Suggestion:** 75inQ suggests that ANNEX XI, Table 2, be modified in order to reflect the changes potentially made to Table 1, thereby reflecting what national indicators of energy poverty are gender-disaggregated.

### ANNEX XII Table 1, Table 3

**Rationale:** Tables 1 and 3 regard the national definitions of energy poverty. While this table cannot be a sufficient legal act to mandate the inclusion of gender in all national definitions of energy poverty, it would be good if the table could have a section recording whether Member States include gender in their definition of energy poverty. This would allow policymakers and research institutions to track where progress is made, even if only symbolically when it comes to energy poverty insights and eradication.

**Suggestion:** 75inQ suggests that a row be added to Table 1 or Table 3 of Annex XII to clearly precise whether national definitions of energy poverty reported on in these make explicit or implicit mentions of gender as a factor in energy poverty.

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<sup>7</sup> Dr. Feenstra, M. (2025) Reframing Energy Poverty through a Gender specify, Lens



## ANNEX XXII

**Rationale:** This section of the methodology is the most disappointing as it requires Member States to report on their implementation of commission recommendations (EU) 2018/1999. This recommendation used to include the following paragraph before it was amended.

*The Paris Agreement reaffirms that the Parties should, when taking action to address climate change, respect, promote and consider their respective obligations on human rights and gender equality. Member States should therefore adequately integrate the dimensions of human rights and gender equality in their integrated national energy and climate plans and long-term strategies. Through their biennial progress reports, they should report information on how the implementation of their integrated national energy and climate plans contributes to the promotion of both human rights and gender equality.*

**Suggestion:** There is no actionable way, in this regulation, to address the loss of such a provision. This issue should prompt one to seriously consider the previous two suggestions.

### **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.

