

75inQ Public Comment:

EU Action Plan for Gender Equality (GAP)

Introduction

75inQ welcomes the Commission's initiative in establishing the EU Action Plan for Gender Equality. In the current geopolitical context, our institutions mustn't lose track of objectives as important as that of gender equality, which has been guiding EU action through Article 8 TFEU since the establishment of the Lisbon Treaty. GAP IV holds great potential in reducing gender inequality in third countries. 75inQ suggests that it does so especially in the sector of the energy transition. As the EU aims for gender equality, we must ensure the sourcing of materials, products and infrastructure abroad does not disproportionately exploit women.

Comment

In its external action, including trade policy and internal-market rules with extra-territorial effects such as the Batteries Regulation and the CSDDD, the EU has the means to alleviate such adverse effects.

Supply chain and TSD agreements

Within the EU's energy transition, the impact of the EU's external action has proven to be detrimental to women in third countries. The development of renewables in the EU cannot be built on the exploitation of women in third countries. By increasing the demand for materials and products that are obtained through processes that structurally disadvantage women, do not pay them the same as their male counterparts and potentially expose them to higher risks, the EU transition's impact abroad can be to further embed gendered inequality.

An example of this issue is that of the Cobalt from the Democratic Republic of Congo (DRC). Roughly 70–80% of global cobalt production comes from the DRC, and about 80% of that output is controlled or owned by Chinese companies, refined in China, and then sold to battery makers including those supplying the European market.¹ The labour conditions in the DRC for cobalt mining are widely documented as risky, but they are also especially detrimental women's health.²

¹ GlobalData. "DRC And Indonesia Anchor Global Cobalt Supply Growth Through 2026." *Mining Technology*, January 13, 2026. <https://www.mining-technology.com/analyst-comment/drc-indonesia-anchor-global-cobalt-supply/>.

² Abulu, Latoya. "Cobalt Mining for Green Energy Risks Women's Reproductive Health in DRC." *Conservation News*, December 30, 2025. <https://news.mongabay.com/2024/11/cobalt-mining-for-green-energy-risks-womens-reproductive-health-in-drc/>.

These labour conditions put women's health and lives at risk by causing repeated miscarriages and premature births. In the framework of a Just Transition, and within the scope of the GAP IV, it is crucial that the EU do more in order to protect women from the impact rising demand in raw materials may have on their working, mental and physical conditions.

To avoid EU actions resulting in such adverse effects, the GAP IV should put more emphasis on including gender equality measures in TSD chapters in future trade agreements as well as the ones that were already concluded.

Gender disaggregated data

In order to be able to conclude fairer agreements that protect women in third countries, there is a necessity for gender-disaggregated data collection, reporting and monitoring. As in every topic relating to gender equality, the ability of regulators to operate meaningful changes is hindered by the low visibility of the issues themselves. In its external action and in the view of alleviating gender inequality abroad, the EU should dedicate special attention to collecting gender-disaggregated data on the impact of its policies abroad. An easy means to do it would be to demand that due diligence reports include such data.

To tread on the previous example of DRC cobalt mining, gender-disaggregated data is absent from most cobalt due diligence reports submitted under the EU Batteries Regulation (2024), despite Article 56 requiring social impact assessments. This misses women's exposure to cobalt dust and related reproductive harms documented in field studies near Kolwezi mines.³ EU Critical Raw Materials Act (2024) mandates traceability but exempts artisanal sources (15–30% of DRC cobalt), where women predominate; no binding gender indicators exist. The Corporate Sustainability Due Diligence Directive (CSDDD) demands adverse impact reporting, yet only 7% of filings disaggregate by gender, per NYU Stern BHR review.⁴

In the context of gender equality, the collection of gender-disaggregated data is crucial, in all fields, and especially in the field of employment, which the European Commission has already argued itself.⁵ The GAP IV must mainstream the practice within the EU's external action.

Suggestions

75inQ suggests the following courses of action in the elaboration of the new Gender Action Plan

1. The GAP focuses on supply-chain social responsibility when conducting external policy. That is, especially in the energy sector and by:
 - a. Ensuring the absence of forced labour in supply chains powering the energy transition;
 - b. Ensuring fair and safe labour standards for female workers powering the energy

³ Baumann-Pauly, Dorothee, and Geneva Center for Business and Human Rights. *Cobalt Mining in the Democratic Republic of the Congo: Addressing Root Causes of Human Rights Abuses*. White paper, New York University Stern Center for Business and Human Rights, January 2024.
https://bhr.stern.nyu.edu/wp-content/uploads/2024/01/Cobalt-Mining-2023_White-Paper.pdf.

⁴ Ibid.

⁵ European Commission: Directorate-General for Energy, E3Modelling and Tractebel Impact, *ASSET study on collection of gender-disaggregated data on the employment and participation of women and men in the energy sector*, Publications Office, 2021, <https://data.europa.eu/doi/10.2833/888421>



transition from abroad.

2. The GAP focuses on collecting gender-disaggregated data to ensure efficient action within this action plan and even more efficient action in the succeeding ones by:
 - a. Integrating the collection of gender-disaggregated data within the mandatory social impact assessments of the CSDDD;
 - b. Ensuring that companies left out of scope do not unfairly treat female workers, whether through low labour conditions or through forced labour;
 - i. By bringing them within the scope of the article
OR
 - ii. By mandating for independent studies and investigations on fringes left out of the scope.

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.

DIVERSITY IN ENERGY

