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75inQ Public Comment:

Simplification of energy-efficient products legislation

Introduction

75inQ welcomes the Commission's intentions in enabling a more prompt energy transition through structural reforms in the energy sector. 75inQ is however concerned with the impacts the simplification of energy labelling procedure will have on women as a category of energy consumers. It is relevant to consider this distributional impact in priority as women and women-led households are more likely to be subject to energy poverty. Please find below a detailed description of the issue at stake and ways to mitigate them.

Comment

This call for an impact assessment seeks to address, between others, the need for simplification in the efficiency labelling process and *other administrative obligations*.

The vagueness of the terms employed renders necessary the following comment. We urge policy makers to consider the importance of the collection, from the source, of gender-disaggregated data in the energy sector. In order to better alleviate gendered energy poverty, policy makers and researchers need for the relevant data to be available. The reporting data for the energy labelling of energy appliances could be the source of such disaggregated data.

The efficiency labeling of heating and cooling appliances is topic that could be useful for, or disadvantage women, by design. At the moment, it is the latter. 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.¹ This means the standard energy consumption of a woman differs from that of a man.

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. At the moment, the European Product Registry for Energy Labelling does not provide such information. At best, this means a representative sample

¹ Dr. Feenstra, M. (2025) Reframing Energy Poverty through a Gender Lens

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,² but also they are not able to pick efficient appliances.

The proposal remains vague regarding the shape administrative simplification will take. 75inQ expresses concerns with the fact that the data collected concerning consumption patterns will become more, or for the least remain just as, imprecise regarding the difference between male and female customers.

In a broader sense, the overall trend towards administrative simplification has often led, in the European Union and third countries, to the diminishment of DEI policies, and especially of those alleviating inequalities between men and women. Article 8 TFEU precises the Union, in all its action, is to promote gender equality.

Suggestions

75inQ does not reject the proposal as a whole, and thus suggests the following:

1. That the *reduction of other administrative obligations* be clearly defined
 - a. And dropped if implying further gender blindness
2. That gendered consumptions differences be included in the calculations of the energy efficiency of heating and cooling appliances

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.

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