

75inQ Public Comment:

Quality Jobs Act

Introduction

75inQ welcomes the Commission's initiative in enacting the Quality Jobs Acts. We align with the Commission's delineation of issues to be addressed.

75inQ has vested interests in the betterment of working conditions for women in the energy sector in particular. Our expertise is especially relevant to the outlined topics of AM and AI integration, OSH at work, and Just Transition.

Please find below a detailed description of the social impacts of the issues at stake and a list of suggested corresponding courses of action.

Comments

On AMs' biases:

AM softwares can represent a risk for the working conditions, career advancement and overall treatment of women in the workplace. These algorithms can be used to either mitigate manager bias, which could be a positive change for managerial practices in areas where there are more men than women. However, when AI is included in the decision-making process of the AM software, one enters a grey area where the AM software can perpetuate bias without traceability. Bias can emerge at two levels: the system level and the data input level.¹

At the system level, bias can arise from decisions made during the development of both algorithms and AI systems, such as the selection of variables and the methods used to

¹Milanez, A., A. Lemmens and C. Ruggiu (2025), "Algorithmic management in the workplace: New evidence from an OECD employer survey", OECD Artificial Intelligence Papers, No. 31, OECD Publishing, Paris (p. 32)
<https://doi.org/10.1787/287c13c4-en>.

measure them.² In other words, as AI algorithms train off of datasets and of the engineers designing them, thus AI reproduces the biases these datasets and individuals hold.³ The individuals concerned are mostly men: women comprise only 22% of AI talent globally and occupy less than 14% of senior executive roles in AI.⁴

At the data level, bias is primarily a concern for AI systems that rely on training data. For instance, if minority employees have historically received lower performance ratings due to stereotypes about competence, an AI model trained on such data may internalise and amplify this bias in its predictions or outputs.⁵

When such a bias occurs, an aggravating factor appears: the attribution of harm is close to impossible. The opacity of AI training processes and data stocks would highly complicate finding the source of gender biases in its outputs.⁶ This calls for preventive action.

On AI as a working tool:

The generalisation of AI as a working tool can have consequences on women as a social group in two concrete ways. It can exclude women from entering or remaining in the workforce, and cause harm to them when in relation to a workforce that uses AI.

To explain the former, AI usage is overrepresented in the male population compared to the female population,⁷ which means that the rise in demand for AI-fluent employees may overly advantage men. Without gender focused awareness policies on the benefits of AI training, the increase in AI literacy as a job requirement may increase the underrepresentation of women in the fields such as that of energy. Means to mitigate such an issue include the education of women towards AI, conducting awareness

² Ibid.

³ Ho, J. Q., Hartanto, A., Koh, A., & Majeed, N. M. (2025). Gender Biases within Artificial Intelligence and ChatGPT : Evidence, Sources of Biases and Solutions. *Computers In Human Behavior Artificial Humans*, 100145. <https://doi.org/10.1016/j.chbah.2025.100145>

⁴ *AI's Missing Link : The Gender Gap in the Talent Pool*. (s. d.). Interface. <https://www.interface-eu.org/publications/ai-gender-gap>

⁵ Milanez, A., A. Lemmens and C. Ruggiu (2025), "Algorithmic management in the workplace: New evidence from an OECD employer survey", OECD Artificial Intelligence Papers, No. 31, OECD Publishing, Paris (p. 32) <https://doi.org/10.1787/287c13c4-en>.

⁶ Cirillo, D., & Rementeria, M. J. (2022). *Bias and fairness in machine learning and artificial intelligence*. Dans Elsevier eBooks (p. 57-75). <https://doi.org/10.1016/b978-0-12-821392-6.00006-6>

⁷ Aldasoro, I., Armantier, O., Doerr, S., Gambacorta, L., & Oliviero, T. (2024). The gen AI gender gap. *Economics Letters*, 241, 111814. <https://doi.org/10.1016/j.econlet.2024.111814>

campaigns with this target population, and the integration of AI into curricula that are typically female-dominated.

To expand on the second caveat, AI itself reproduces gender biases, by design. As explained earlier, AI algorithms train off of datasets and of the engineers designing them, thus AI reproduces the biases these datasets and individuals hold.⁸ Therefore, the inclusion of AI tools in the energy sector, whether it be at the producer or consumer level, may disadvantage, infantilise and overall project gendered stereotypes on female AI users, benefactors or subjects of analysis. Those stereotypes are harmful, for a myriad of reasons that need not be recalled here. In such a sense, the integration of AI technologies in the daily activities of a firm, if not used with appropriate safeguards, may increase gender inequality.

On occupational safety and health (OSH)

The impact assessment mentions the project of revision of two EU OSH directives, yet does not mention the revision of regulation (EU) 2016/425 on personal protective equipment, nor the Council Directive 89/656/EEC . If one is to reform OSH norms in order for them to cater to demographic change in the workplace, the starting point should be reforming those that may result in an employee's death.

Safety clothing is historically designed for men by default. The male default standard usually results in female users being under-served by the piece of equipment. When it comes to safety clothing, it is imperative that women employees be as protected by the safety equipment as men are. Within 75inQ's research activities, it has been brought to our attention that offshore energy platforms still do not systematically carry women's size safety suits. A safety suit that is too large for a woman while diving on offshore platforms results in its inefficiency. That is, both because the equipment may get caught in the structure and thus immobilise the wearer, but also because it can then be easily perforated, which then endangers the person's livelihood.

⁸ Ho, J. Q., Hartanto, A., Koh, A., & Majeed, N. M. (2025). Gender Biases within Artificial Intelligence and ChatGPT : Evidence, Sources of Biases and Solutions. *Computers In Human Behavior Artificial Humans*, 100145. <https://doi.org/10.1016/j.chbah.2025.100145>

The regulations at hand do not mention what sizes have to be carried, nor whether they have to cater to women's size, but rather: *an adequate range of sizes*. Whether because the wording of the provisions is too loose to imply compliance, because the compliance is not verified or because the provision did not mean to cater to women, it is unacceptable.

75inQ stands firm on the position that before anything, the livelihood of EU female citizens working in male-dominated sectors be ensured just as well as their male counterparts'.

On the Just Transition:

To ensure the social fairness of the transitions to come, a binding framework is necessary. In 2026, 75inQ conducted a soon-to-be published research project within the Stroomversnelling project regarding the factors for the attraction, retention and departures of women from the energy sector, a sector that will need to considerably expand in order to reach the EU Net Zero objectives. 75inQ believes that the energy transition and recomposition of its workforce represents a rare opportunity to establish a gender-balanced energy workforce. The energy workforce expansion in the renewables area also represents an unprecedented mass-opening of high-paying jobs which could be filled by women, both to increase representation in the sector but also to mitigate economic inequality between the two demographic groups in the wider population.

The traditional energy workforce is strongly male-dominated. The lack of women in energy transition-related roles is also comprehensively documented and researched. Before even reaching the energy sector as employees, women in technical studies are already underrepresented. The STEM participatory rates are clear: in the EU, 88% of women participate in STEM education at secondary level, 35% at tertiary level, and only 30% become STEM graduates.⁹ At the university level, women consistently outperform

⁹Khoso, F. J., Sahito, Z. H., et al. (2025). *Bridging the gender gap in STEM education: Analyzing the role of mentorship, curriculum design, and policy interventions in encouraging female participation*. International Journal of Social Science & Entrepreneurship (p. 9). <https://ijsse.salmaedusociety.com/index.php/ijsse/article/view/385/308>

men, even in engineering fields.¹⁰ However, in parallel, they are more likely to abandon these programmes along the way. Education set aside, women do not necessarily enter the STEM workforce after acquiring the right training for STEM positions. In Europe, women represent 1 in 3 Information and Communications Technologies (henceforth ICT) graduates but only 1 in 5 ICT specialists.¹¹

First, the most effective and immediate tool in order to achieve gender balance in transitioning sectors is that of gender quotas. Meta-studies explain that quotas are the most effective and immediate way to feminise an industry, and that quotas engender positive feedback loops.¹² These feedback loops consist in the overall rising perception of women as competent when they are mandated for high management positions.¹³ At the education level and in order to solve the energy transition's skills gap, research also proves that women are more likely to enroll in STEM degrees if they have a quota mechanism.¹⁴

Second, the most cited reason for women exiting the STEM and energy field is the inflexibility of work hours and the lack of work-life balance.¹⁵ STEM industries are historically male-dominated industries, meaning the typical working hours of an employee do not fit the typical responsibilities of women. More often than not, women in households are responsible for care work regarding children such as picking them up from school or attending doctors appointments. Inflexible working hours are incompatible with such responsibilities and more can be done on the topic in order to retain women with familial responsibilities in the sector. Making work in STEM compatible with a woman's plan to have a family will also increase the number of women who consider entering that workforce.

¹⁰Felder, R. M., Felder, G. N., Mauney, M., Hamrin, C. E., & Dietz, E. J. (1995). A longitudinal Study of Engineering Student Performance and Retention. III. Gender Differences in Student Performance and Attitudes. *Journal of Engineering Education*, 84(2), (p.153). <https://doi.org/10.1002/j.2168-9830.1995.tb00162.x>

¹¹European Commission. (2022). Women in digital. <https://digital-strategy.ec.europa.eu/en/policies/women-digital>

¹²Revillard, A., & Tuffy, Y. (2023). Gender quotas: An interdisciplinary scoping review. *French Politics*, 21(3), 315–334 (p. 326). <https://doi.org/10.1057/s41253-023-00221-4>

¹³ Ibid.

¹⁴Castro Nofal, B., et al. (2026). *The impact of gender quotas on applications and enrollment in STEM higher education programs: The case of the "Más Mujeres Científicas" (+MC) policy in Chile* (p. 18). SSRN Electronic Journal. <https://doi.org/10.2139/ssrn.6327518>

¹⁵ Ibid.

Here, leverages exist in order to make the transition of a historically non-diverse workforce, a just transition. Without enacting measures to attract and retain women, the expansion and transformation of that industry will only increase social inequality.

Suggestions

In order to ensure good, fair working conditions adapted to the modern economy, 75inQ suggests that the following actions be taken within the Quality Jobs Act

For AM

1. To establish a binding 'human in the loop' clause for all corporate AM usage
 2. To ensure AMs are free of biases
 - a. By reviewing the training data of AI powers AMs;
 - b. By controlling for programming bias
- OR
- c. By establishing third-party reviews of AM-led critical managerial decisions (e.g. promotion, termination of employment)

For AI

1. Encouraging the AI training of women, both in already senior positions, early career and those who are still pursuing an education, within the whole energy sector.
2. Overall, encouraging women to pursue roles within the AI sector, and the associated education paths.
3. Encouraging the use of gender-disaggregated data, and taking into account within company policies the gendered disparities that may appear.
4. Providing resources, awareness campaigns and potentially direct funding opportunities to female-led companies wishing to incorporate AI-powered tools into their companies in the energy sector.

For OSH

1. To amend regulation (EU) 2016/425 Annex II, point 1.3.1, in relation with Article 4 of Council Directive 89/656/EEC in whichever way the legislator to achieve the following effect
 - a. For manufacturers to produce PPE equipment tailored for female workers
 - b. For employers to be obliged to supply those to female worker

For a Just Transition

1. To establish binding quotas in the hiring processes of transitioning male-dominated industries such as the energy sector
2. To encourage flexible work arrangements in sectors under tension
3. To encourage employers to consult resources regarding female talent attraction such as those that will be published in Q4 2027 by the Stroomversnelling consortium

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

