



EmpowerMed

*Policy recommendations
for gender-just policies to
reduce energy poverty*





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The policy recommendations are based on results and experiences from the H2020 EmpowerMed project and the regular screening of the EU frameworks. The focus will be put on the Renewable Energy Directive (RED) and the Energy Efficiency Directive (EED).

Keywords: energy poverty and gender, EU policy, Renewable Energy Directive (RED), Energy Efficiency Directive (EED), vulnerable households, Renovation wave

1. Framing

As bills skyrocket across Europe, the urgency to address the systemic causes of energy poverty has never been more apparent. Energy poverty has been exacerbated by geopolitical wars in the last year. However, the scandal of indecent housing, fossil fuel addiction and neoliberal energy markets meant that 1 in 4 Europeans¹ were subjected to energy poverty even before the invasion of Ukraine.

Moreover, women, who are disproportionately impacted by energy poverty², are largely left out of the solutions and not targeted in the energy poverty support programmes. Energy policy and decision-making continue to be primarily ring-fenced to male-dominated spaces. They are perceived as purely technocratic, with little awareness of the broader socio-political factors or the importance of accessibility and inclusivity.

But it becomes clear: energy poverty is systemic and therefore requires systemic, intersectional solutions. The good news is: that the European Green Deal has the potential not only to mitigate the climate crisis but also to alleviate inequality and injustices across Europe. It brings the benefits of climate action and a just energy transition into people's homes and engages new demographics.

There are clear solutions to energy poverty, including scaling up renewables, subsidising heat pumps, and ending fossil fuel lock-ins for poor households. Additionally, it involves subsidising deep renovation programmes for poor households in an accessible and inclusive way. These policies and programmes will not be inclusive by nature unless this is established in a concrete decision-making and design step.

Without an awareness of placing gender justice at the heart of these programmes through generating and collecting data, through programme design and implementation, we risk these programmes failing to reach those who really need them. Not mainstreaming gender into these programmes and frameworks will reinforce inequalities over a long period, limited financial, social and human resources will be wasted, and environmental changes will be missed.

¹ Right to Energy Coalition (n.d.): About Energy Poverty, <https://righttoenergy.org/about-energy-poverty/>.

² EmpowerMed (2020): Report on gender aspects of existing financial schemes for poverty measures, <<https://www.empowermed.eu/resource/report-on-gender-aspects-of-existing-financial-schemes-for-energy-poverty-measures/>>.

EmpowerMed has solutions which help to overcome the hurdle of gender exclusion in the Green Deal and ensure that we tackle energy poverty at its root. The recommendations are structured on three levels:

- General recommendations
- RED: Renewable Energy Directive
- EED: Energy Efficiency Directive

2. General recommendations

- **Gender-disaggregated data on energy poverty at the EU and national level**

Drivers of energy poverty are structural and systemic. Energy poverty is caused by i) indecent housing, ii) fossil fuel dependency and lock-ins, and iii) systemic and structural inequalities. A majority of female-led households are affected by those drivers; hence gender is a crucial axis to be included when tackling energy poverty.

 - Raise awareness about the intersection of gender and energy poverty, call for a coherent definition/concept of “vulnerable households” (we prefer “households in vulnerable situations”) and “energy poverty”, which includes a gender and intersectional dimension.
 - Furthermore, collect gender-disaggregated data on energy poverty annually regarding heating and cooling to harmonise energy poverty measurement, e.g., through Eurostat.
- **Gender-transformative policy design and implementation**

Ensuring that energy policies and energy efficiency programmes are implemented in a gender-transformative way and considering the different needs and experiences of all genders and distinct social groups to guarantee the human right to clean, affordable energy for all. This means designing specific programmes targeting women with concrete measures relating to issues, such as summer energy poverty and the health impacts of energy poverty. A Pan-European cross-sectoral strategy is needed (more coherent policy, gender-disaggregated data, more research on effects for women/different genders, and monitoring)³.

 - There is a high potential for the EU to function as a role model (using tools like communication, gender trainings, impact assessment, gender budgeting or programmes like Marie Skłodowska-Curie Actions). Such programmes can be enabled in collaboration with the Energy Poverty Advisory Hub, Covenant of Mayors, the Committee on Women’s Rights and Gender Equality (FEMM),

³ European Pillar of Social Right (2017): 2. Gender equality, 20. Energy is part of the essential services, <https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/economy-works-people/jobs-growth-and-investment/european-pillar-social-rights/european-pillar-social-rights-20-principles_en>.

and feminist or women's CSOs as policy advisors.

- Establishing an advisory board on gender inclusivity and energy transition, incl. energy poverty, by the European Commission would foster a gender approach in all policies.
- Ensuring that relevant findings from gender-related climate and energy research are incorporated in discussions, statements and discussions of EU bodies.

● Targeted financing

Low-income households specifically face the split-incentive barrier (landlord/tenant dilemma)⁴, hence they have less decision-making power when it comes to deciding about the energy supply for their flat/house or renovation measures. Additionally, current loan schemes and market incentives do not specifically target energy poor households⁵, certainly not in a gender-just way.

Gender-budgeting measures would ensure that funds target especially women in precarity, e.g., by providing targeted financing to low-income female-led households to support them in installing energy efficiency measures, such as insulation or upgrading to more efficient heating systems.

- Gender indicators must be included in financial programs such as rental acts, on-bill finances, green leases, feed-in tariffs, etc.
- Aiming for a structural transformation, projects funded by Horizon or Life can enable sustainable and gender-just structures. Hence, more support from these funds is needed for research and innovation on gender and energy poverty, equal societies and power shifts, such as in the projects W4RES⁶ (H2020), Entrances⁷ (H2020), EUCENA⁸ (EUKI).

3. Specific recommendations

Renewable Energy Directive RED

The Renewable Energy Directive (RED) establishes rules to remove barriers, stimulate investments and drive cost reductions in renewable energy technologies. This empowers citizens, consumers and businesses to participate in the clean energy transformation on the local level. It pushes a decentralised energy system with many citizens and municipalities participating in the production and distribution of renewable energy. The RED acknowledges the critical role of Renewable Energy Communities (RECs) in addressing energy poverty and recognises that the concept of prosuming and renewable energy

⁴ European Parliament's Committee on Industry, Research and Energy (ITRE) (2016): Energy Efficiency for Low-Income Households, <[Energy Efficiency for low-income households \(europa.eu\)](https://ec.europa.eu/eurostat/tgm/table.do?tab=table&init=1&language=en&plugin=1)>.

⁵ Right to Energy Coalition (2021): The Energy Efficiency Directive: How it can deliver for Europe's energy poor?

⁶ Project webpage of Women for market uptake of renewable heating and cooling (W4RES): <https://w4res.eu/>

⁷ Project webpage of ENergy TRANSitions from Coal and Carbon Effects on Societies (Entrances): <https://entrancesproject.eu/>

⁸ Project webpage of European Citizen Energy Academy (EUCENA): <https://citizenenergy.academy/>

communities can help fight energy poverty through energy literacy, reduced consumption and targeted supply tariffs and provide access to renewable energy to a broad public. **Gender perspectives and instruments can increase gender equality and push a socially fair and gender-just decentralised and democratic energy transition.**

- Article 4 - Support schemes for energy from renewable sources
 - Support schemes for electricity from renewable sources shall include **gender and intersectional dimensions** to support the citizens most affected by energy poverty, considering energy education and communication.

- Article 18 - Information and training
 - Member States shall ensure that **information on support measures is developed in a gender-just manner and made available to all relevant actors**, such as consumers, including low-income consumers, consumers in vulnerable situations, self-consumers of renewable energy, renewable energy communities, builders, installers, architects, suppliers of heating, cooling and electricity equipment and systems, and suppliers of vehicles compatible with the use of renewable energy and intelligent transport systems. **A focus will be to address, recruit, inform and train women and all genders and provide gender-transformative material and safe spaces for all participants.**
 - To directly target groups in marginalised situations with such information campaigns; for example, one stop-shops can be established, providing technical assistance on renewable energy installations⁹. **Also (Gender) Energy Ambassadors in local communication could function to visit low-income households, inform about Do-It-Yourself (DIY) measures or inform about and install smart meters in the households.**

- Article 21 - Renewables self-consumers
 - Member States shall put in place an enabling framework to promote and facilitate the development of renewables self-consumption and active prosumers based on an assessment of the existing unjustified barriers to, and the potential for, renewables self-consumption in their territories and energy networks. That enabling framework shall, inter alia:
 - (a) address accessibility of self-consumption of renewables to all final customers, including those in low-income households with a particular focus on women;**
 - (b) address unjustified barriers to the financing of projects in the market and measures to facilitate access to finance with targeted gender-transformative programmes.**

⁹ Energy Cities (2020): How to set up a one-stop-shop for integrated home energy renovation? A step-by-step guide for local authorities and other actors, [INNOVATE_guide_FINAL.pdf](https://energy-cities.eu/innovate-guide-final.pdf) (energy-cities.eu).

- **Article 22 - Renewable Energy Communities**

Article 22 explicitly states that Member States must ensure, through their enabling frameworks for RECs, that the “participation in renewable energy communities is accessible to all consumers, including those in low-income or vulnerable households”. This means that Member States are required to put in place policies and measures to remove potential barriers that might prevent low-income households/households in vulnerable situations from (voluntary) participation in RECs so that they can benefit from RECs on an equal footing with other potential members. This could include incentives for low-income households or energy communities themselves, so they can prioritise outreach to and inclusion of such households. **Gender-transformative or feminist energy communities will plan, implement and monitor all activities.**

Renewable Energy communities (RECs) can address the structural causes of energy poverty and ensure access to clean and affordable energy as a basic right.

- Ambitious implementation of the RED at a national level shows great potential for energy communities. E.g., for prosumers and energy sharing to allow production, sharing and self-consumption. RECs enable a decentralised energy system with many citizens and municipalities participating in the production and distribution of renewable energy. The focus on solar technologies is particularly suitable for the RECs. It enables all citizens to participate and to become engaged energy citizen, **targeted programmes for women and non-binary persons needs to be included.**
- As energy communities and cooperatives are being run by local actors and act as social actors, they are well placed to provide gender-just approaches in an accessible manner for further local energy programmes. A good example is Energy Communities Tipperary Cooperative (ECTC)¹⁰, a community-led home insulation upgrade and retrofitting organisation.
- Energy sharing shows enormous potential for nearly all households to join renewable energy communities and to consume locally produced energy. It can provide stable energy prices, even in times of crisis. **All household energy managers (mostly women) will be addressed and informed about energy sharing in general and engagement in energy communities in particular.** A potential study in Germany shows that more than 90% of German households could participate in energy sharing¹¹.
- Policy design: Household energy managers should be addressed and informed about energy sharing and actively engaged in designing and implementing energy community projects.
- Strengthen the role of all prosumers and energy communities by **introducing gender targets in the RED. This will allow all households, including women-led households and households in precarious situations, to**

¹⁰ Webpage of Energy Communities Tipperary Cooperative (ECTC): energycommunitiestipp.ie/.

¹¹ https://www.ioew.de/publikation/energy_sharing_eine_potenzialanalyse00

have access to save energy and become members of energy communities. Some methods and approaches which would enable this include:

- Right to energy sharing should be transposed in an ambitious way
- Reduced taxes or prices for rooftop or balcony modules
- Financial, ring-fenced support and incentives for membership in energy communities
- DIY programmes for **LGBTQIA* community members living in energy poverty**
- **Targeted and accessible information for women and all genders with gender-responsive communication material and channels.**
- Establish coordination centres for energy communities on the EU and national levels: good practice is an energy community agency in Austria¹²
- Flexible concepts of investments, like in-kind contributions, rate payments
- Development of **gender expertise in energy communities with trainings, targets, gender-responsive communication**
- Showcase and highlight examples like community energy for the energy solidarity project¹³

Energy Efficiency Directive EED

Energy efficiency is one of the most effective solutions to alleviate energy poverty, e.g., through renovation measures for buildings¹⁴. The EED is a crucial opportunity to cut carbon emissions and reduce social inequalities in energy consumption by supporting low-income households to access clean energy¹⁵. When it comes to implementing energy saving measures on the household level, one needs to take into consideration that low-income households, especially women, face barriers, such as no housing ownership, no financing opportunities, no (government) funding, no time capacities because of care responsibilities and less access to information.

To meet the Energy Efficiency First (EE1st) principle, ensure clean energy for all genders and tackle energy poverty, we propose some specific amendments to the EED.

¹² Österreichische Koordinationsstelle für Energiegemeinschaften (n.d.): Energiegemeinschaften in Österreich, <<https://energiegemeinschaften.gv.at/>>.

¹³ Community Energy for Energy Solidarity (CEES) (2022): Regulatory frameworks for ECs and energy poverty: Do they line up?, <https://www.energysolidarity.eu/https-www-energysolidarity-eu-wp-content-uploads-2022-11-cces_d4-1-regulatory-and-legal-frameworks_fin-pdf/>.

¹⁴ European Commission (n.d.): *Energy efficiency in buildings*. <https://ec.europa.eu/energy/en/topics/energy-efficiency/buildings>; Castellazzi, Luca et. al (2017): Overcoming the split incentive barrier in the building sector. Unlocking the energy efficiency potential in the rental & multifamily sector. In: European Commission, Joint Research Centre (JRC).

¹⁵ Right to Energy Coalition (2021): *The Energy Efficiency Directive: How it can deliver for Europe's energy poor?*; European Commission (n.d.): Energy poverty in the EU, <[Energy poverty \(europa.eu\)](https://energy-poverty.europa.eu/)>.

- **Article 9 - Energy efficiency obligation schemes**
 - As mentioned in Article 8 (3), Member States should implement energy efficiency obligation schemes that prioritise people affected by energy poverty. Due to the aforementioned economic, physiological, and socio-cultural reasons, women are more likely to fall into energy poverty. Hence they make up a high share of low-income households, people in marginalised situations, or people living in social housing. **To ensure that the gender-specific needs of such groups are met, the Energy Efficiency Obligation (EEO) schemes should apply a gender dimension.** The EEO should implement “ring-fencing” requirements to install energy efficiency measures in low-income households¹⁶ without additional financial burdens.

- **Article 11 - Energy audits and energy management systems**
 - Energy audits are one of the most established measures in Europe to promote energy efficiency¹⁷. Such audits of buildings help identify areas where energy efficiency improvements could be made; criteria for energy audits should focus on life-cycle cost analysis (LCCA) to prevent energy poverty in the long run. **Gender-disaggregated data of these audits (type of household, e.g., single-parent household) should be considered.**
 - **Action:** Qualify women as energy auditors/in-house experts via trainings in accordance with the qualification schemes issued by the Member States.

- **Article 12-19 - Promotion of efficiency in heating and cooling**
 - Design policies that consider low-income households' affordability and specific needs to prioritise clean heating and cooling with energy efficiency (ensure ‘fossil-free first’ for low-income households).
 - Example: The Austrian programme *Sauber Heizen für alle 2022* that support low-income households (only persons living in 1- or 2-family-houses)¹⁸. These households are subsidised up to 100% of the costs to switch to a climate-friendly heating system.
 - Heat pumps are a cost-effective and efficient way to replace boilers based on fossil fuels or gas. Besides developing and modernising district heating systems, which can replace fossil fuels in individual heating, the **Renewable Heating and Cooling Sector can be diversified by integrating an intersectional perspective** (e.g., EU Horizon 2020 funded project “W4RES – Women for Market Uptake of Renewable Heating and Cooling”¹⁹ is a best-practice example). The higher the share of women in the RHC, the better the needs of diverse customers can be considered in developing new RHC technologies.

¹⁶ European Parliament’s Committee on Industry, Research and Energy (ITRE) (2016): Energy Efficiency for Low-Income Households, <[Energy Efficiency for low-income households \(europa.eu\)](https://ec.europa.eu/euro-observatory/en/energy-efficiency-low-income-households)>.

¹⁷ European Parliament’s Committee on Industry, Research and Energy (ITRE) (2016): Energy Efficiency for Low-Income Households, <[Energy Efficiency for low-income households \(europa.eu\)](https://ec.europa.eu/euro-observatory/en/energy-efficiency-low-income-households)>.

¹⁸ Klimaaktiv (n.d): Sauber Heizen für alle: Bis zu 100% Förderung für einkommensschwache Haushalte, <<https://www.klimaaktiv.at/erneuerbare/erneuerbarewaerme/sauber-heizen.html>>.

¹⁹ Project webpage of Women for market uptake of renewable heating and cooling (W4RES): <https://w4res.eu/>

- Article 21 - Information and awareness raising
 - Here, the same recommendations mentioned for Article 18 of the RED can be applied.
 - The dissemination of information on energy efficient measures and financing instruments is key, and targeted information and advice shall be disseminated to customers in vulnerable situations and people affected by energy poverty. **To reach women, it is necessary to tailor the information and its dissemination according to their needs by providing targeted campaigns. Gender dimensions include a gender-just language and specific gender-responsive communication tools** such as non-stereotypical images or colours.
 - **To transfer knowledge and increase the participation of women in the energy sector, especially those affected by energy poverty, local communities/contexts such as energy communities, municipalities or cities play an essential role.** Such actors can provide support schemes, launch awareness campaigns on energy efficiency measures and promote participatory approaches.

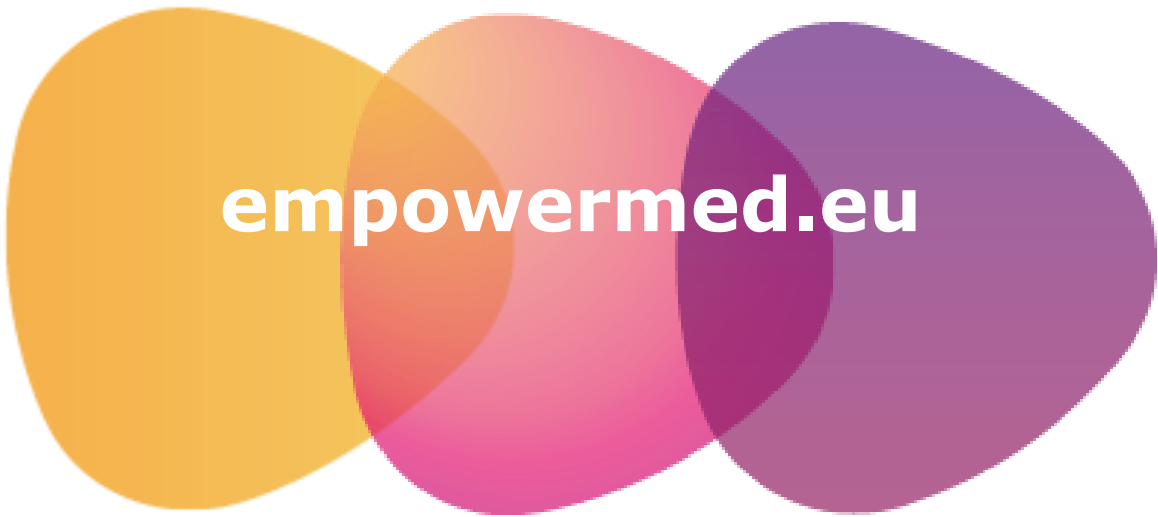
- Article 22 - Empowering and protecting vulnerable customers and alleviating energy poverty
 - We support all measures proposed under this article to support and protect customers in vulnerable situations but call for the inclusion of a gender dimension. The definition of the concept of “vulnerable customers” should include a gender dimension and be based on gender-disaggregated data. Furthermore, both the concept of “vulnerable customer” as well as “empowerment” measures should be assessed critically to avoid reinforcing existing inequalities or structural barriers. Empowerment should be viewed as a collaborative effort, where the goal is to work with affected people to understand their perspective and strengthen their own capacity and autonomy rather than imposing external solutions on them.
 - In Art. 22 (4), establishing the network of experts needs to include gender experts, feminist NGOs and other stakeholders working on energy poverty and gender. A holistic cross-sectoral approach is essential to develop coherent policies that provide long-term solutions, not exacerbating existing inequalities among several social groups. In this regard, we fully support (4d).

- Article 28 - Energy Efficiency National Fund, Financing and Technical Support
 - We support the idea that MS shall establish an Energy Efficiency National Fund that provides financial support to install energy efficiency improvement measures. These funds shall be visible and accessible to customers in vulnerable situations and people living in energy poverty. Non-discriminatory access shall be possible, **this is even more important for women who lack access to credits and loans due to the gender pay gap, which provides them with less collateral to offer to financial institutes.**

- Recitals 33, 45, 50, 111 - (Deep) renovations of buildings
- Cost-effective approaches to renovations must prioritise energy-poor/low-income households and include gender indicators (see argumentation about targeted financing above). Pay attention to gendered needs towards renovation and gendered performances in renovation processes.

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