WHY THE EUROPEAN GREEN DEAL NEEDS ECOFEMINISM

Moving from gender-blind to gender-transformative environmental policies

Report
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There is no Planet B!

Fighting for our future
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As a non-binary gay person of colour, navigating the world as an environmental activist, researcher, educator and writer has enabled me to explore multiple ecological matters through a gender and social justice lens. From writing on issues revolving around environmental racism, the rise of ecofeminism, queer bodies and ecology, and the gendered impacts of climate change, my approach to such issues have long been a queer, anti-essentialist, alter-globalist, ecofeminist one.

As a young researcher, I have been faced with the criticism of having a misandric approach to environmentalism, that is, an approach based on contempt for men. However, my message is: queer intersectional ecofeminism is not built on a juxtaposition. Queering and intersectionalising ecological feminism means to no longer blame men and victimise women or to demonise culture and celebrate nature.

Although ecofeminism started with essentialist, binary views, it has shifted towards a more inclusive non-binary approach. It problematises patriarchal, capitalist, exploitative, sexist systems and their multiple forms of oppression. Ecofeminism is a transformative, inclusive and activist movement that has landed a strong place in academia and redefined environmentalism by fusing it with an intersectional lens that called for paying equal attention to the impacts of environmental degradation on women, LGBTQ+ people, indigenous people, people with disabilities and other marginalised groups. It analyses oppressive hierarchical systems and examines how they are intertwined. This is what the world needs right now in its state of climate, environmental and pandemic emergency.

Climate solutions presented in technological and scientific advancements or the promotion of a low-carbon energy future through the energy transition are only half of the answer. The other half lies in ensuring climate justice through social justice. Through the egalitarian lens of ecofeminism, researchers, activists, educators and decision-makers can, together, draw a path towards a less segregated, more inclusive world where people are treated equally.

This is crucial now in the upcoming post-pandemic era where COVID-19, an ecological and public health disaster, has clearly shown that humans are facing the same storm, but are beyond any doubt not in the same boat.

In Europe, a significant number of environmental policies are gender-blind and lack a deeper analysis of environmental issues as complex socio-political challenges. The European Green Deal is not different. It focuses heavily on technoscientific solutions to problems while beyond these we need socially transformative answers. This report addresses the absence of gendered issues in the European Green Deal policies and reflects on what gender-just environmental policy-making can look like. Through the lens of intersectional ecofeminism, it challenges the idea that gender justice can be attained by only increasing women's participation in decision-making.

This work is an example of translating ecofeminism into environmental policies. It adopts an innovative, thought-provoking, intersectional approach to the multiple environmental and social issues it addresses. While masculine norms are “deeply institutionalised in climate institutions; hence, policy-makers adapt their actions to the masculinised institutional environment,” this report pushes for truly transformative gender mainstreaming in environmental policy while dismantling systems of oppression.

1 Alterglobalism is a social movement that supports global cooperation and interaction, but opposes the negative effects of economic globalization such as environmental and climate degradation, socioeconomic inequalities, precarious work, conflicts...

In recent years, European environmental and feminist movements have seen increasing support. Ecofeminist theories and practices are regaining attention with women mobilising against nuclear energy, the destruction of nature or for a feminist perspective in urban planning. The European Green Deal as the main policy framework of the current European Commission and the new European Gender Equality Strategy are strong signals that both environmental protection and gender equality are high up on the von der Leyen Commission’s agenda. Even though the Lisbon Treaty declared gender mainstreaming an obligation for policymaking and even though the interlinkages between gender equality and environmental challenges have been demonstrated in Europe and globally, European environmental and gender policies remain largely isolated from each other with very little consideration of gender analysis also in latest policy developments around the transition towards sustainability.

This report investigates various aspects of the nexus between gender equality and environmental action in Europe. First, environmental impacts are gendered. For example, men cause on average 8 to 40% more emissions than women, mainly due to their mobility and dietary behaviour. Women tend to opt for more sustainable mobility choices and have different travel patterns with shorter and more frequent trips while public transportation services are often modelled upon men’s direct commutes to work. As economic power is still unequally distributed, energy poverty disproportionately affects women, while women led households may have less resources to invest in sustainable solutions. Due to social norms, beauty standards, gendered occupations and biological factors, women are disproportionately affected by chemicals such as those found in cosmetics or cleaning products.

In terms of representation, the environmental sector is far from being gender equal or inclusive which reflects the overall underrepresentation of women in political decision-making. For instance, parliamentarians sitting on environmental committees are still by a significant majority male and 70% of environment ministers in EU Member States today are men. Men represent 68% of the renewable energy workforce thus the development of green jobs through the transition risks to widen the gender employment gap.

Women with varying levels of marginalisation, for instance, racialised women, young women, women with disabilities and non-gender conforming people, face intersectional discrimination. They are more vulnerable to environmental problems and effects of climate change and the risk of being left behind in the green transition. Stereotypes, sexist and violent work culture, tokenism and structural racism are amongst the explanatory factors.

The European Green Deal policies that this report analyses remain largely dominated by an androcentric perspective. Beyond gender-blindness, androcentrism assumes that the masculine model is the neutral and objective point on which to base policies. As European policies do not operate in a vacuum, they risk reproducing existing inequalities and discrimination in our society. For example, the Just Transition Mechanism, the main tool of the European Green Deal to ensure the transition will be equitable, disburses funds for the transition of coal workers to shift to green industries. While brown industry areas need strong support in the transition, the current structure of the mechanism is most likely going to be benefitting mainly men in coal mining areas instead of taking a deeper look at which social groups needs specific attention during the transition.

Other policies such as the Climate Law, the Renovation Wave, the Sustainable and Smart Mobility Strategy mention gender but fail to propose concrete solutions addressing gender inequalities. Moreover, all these policies lack an intersectional perspective. The Common Agricultural Policy (CAP), consuming a third of the EU budget, is not only environmentally damaging but also gender-blind. For example, while it has been proven that female farmers tend to adopt more sustainable farming practices, the funding scheme does not address their needs or tap into their potential, still assuming a patriarchal model of men as breadwinners.

Based on these findings, we propose a list of measures (while not exhaustive) that can contribute to achieving an inclusive, gender-just, impactful and more effective transition to a carbon neutral and sustainable future.
**Intersectional and gender-transformative policy objectives**

- **Gender equality should be integrated into the objectives of environmental policies.** This is a precondition for policy coherence, given the cross-cutting character of both environment and gender equality and the provisions on gender mainstreaming under the European treaties.
- **The EU needs to challenge prevailing systems of oppression and redefine social, economic and political norms** that work for all people and the planet. The environmental and social crisis, including the staggering gender inequalities that we are facing in Europe and worldwide, are rooted in unfettered capitalism, patriarchy, and racism.
- **The EU needs to apply an intersectional framing in environmental policies** to benefit all European people equally and to raise interest and acceptance of the transition. This intersectional framing should analyse how social characteristics intersect with each other leading to unique experiences of discrimination as well as the structural, historical and institutional root causes of such discriminations. For example, when addressing skin-lightening creams containing mercury, we need to dismantle colourism, the process by which black women with darker skin tones suffer more from racism than other women.

**Toward a feminist economy of well-being and care**

- **The EU should apply a more holistic concept of sustainability** for the green transition, one that includes environmental, economic but also social dimensions equally and gender justice more specifically.
- **The EU needs to reframe its core policy goals away from Gross Domestic Product (GDP) growth towards well-being,** based on an understanding of the centrality of the care economy and lessons learned from the Covid-19 crisis. For example, GDP as an overall indicator for prosperity should be replaced with better methods of measuring well-being, human rights, tackling inequalities based on gender and other social and economic discrimination, and protection of the environment and climate.
- **A right to care should be recognised as a fundamental right of the EU.** As demonstrated during the Covid-19 pandemic, paid and unpaid care are central components holding our societies together. Member States (MS) should prioritise access to inclusive and quality caring public services through investments and legislation.
- **These principles should be applied to key European frameworks such as the European Green Deal implementation, EU economic governance, the 8th Environmental Action Programme (8EAP) etc.** On the European Green Deal implementation, **initiatives promoting ecosystem-based solutions originating from ecofeminists practices and learnings should be more prominent.** The European Commission (EC) should table revised, gender-aware versions of the Just Transition Fund and the Renovation Wave with funding including the care sector as one of the beneficiaries.

**Ensuring gender-transformative environmental policies**

- **The EU should develop and finance awareness-raising initiatives on gender and the environment.** These could be, inter alia, high-level policy events, awareness-raising campaigns, knowledge-sharing between member states and civil society organisations. The topics could range from showcasing women’s input into the green transition (for example, in sustainable farming), promoting women role models in STEM or challenging cultural norms. The media sector must be included in these initiatives as they play a key role in promoting cultural norms.
- **The EU, through Eurostat and the European Institute for Gender Equality, should collect disaggregated data on a broad range of socio-economic characteristics such as sex, age, disability, sexual orientation and identity, gender identity and race and apply an intersectional analysis.** Examples of disaggregated data missing include: Common Agricultural Policy (CAP) support recipients; energy production, distribution and consumption; people experiencing energy poverty; recent data on travel patterns; impact of climate change in the EU and globally; impact of chemicals especially to including on transgender people; repartition of the environmental burden in households.
- **The EC should allocate funding of research programmes (for example through**
Horizon Europe) to explore better the interlinkages between gender and environment inside the EU. Areas to be examined could include understanding women's farming practices at an EU level, assess the care sector's environmental footprint/contribution to sustainability, chemical composition of menstrual products.

- The EC must systematically apply gender mainstreaming in green budgeting and taxation. For example, by developing benchmarks and indicators for gender equality as part of the Scorecard that will be finalised by the end of the year to monitor the implementation of National Recovery Plans.

- The EC should integrate gender into existing Impact Assessments (IAs) on environmental policies to explore unintended impacts on gender equality and develop gender-responsive policies. The method used should be robust and harmonised and include the consultation of various gender experts. The IAs should be mandatory and in case of non-compliance, the proposal should be revised or withdrawn.

Recommendations for a gender-just representation at the EU and national level

- **Political level:** parity measures, policies and practices for a better work-life balance and zero tolerance for toxic masculinity, discrimination and violence in EU institutions and political parties.

- **Business level:** binding targets on the share of women in all their diversity in male-dominated environmental sectors (such as renewable energy, energy efficiency and construction) at all levels (boards, executive committees, management & global workforce) and dedicated funding for measures that feminise the workforce through the Just Transition Mechanism.

- **Environmental movement:** environmental NGOs must deepen the dialogue with women's rights and gender organisations, anti-racist and youth organisations, organisations representing disabled people and socially excluded individuals and communities as well as implement gender and diversity-sensitive internal policies in recruitment, promotion, pay, training policies and inclusive communication.

- **The EU institutions should organise transparent, formalised, inclusive and meaningful consultation of stakeholders on environmental policies including gender institutions (such as EIGE), gender experts, women rights and gender organisations as well as the most marginalised women (racialised women, women with disabilities, young women...).**

### Sectoral recommendations

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<td><strong>Economy and labour</strong></td>
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<td>The EU should transform its Stability and Growth Pact into a Sustainability and Wellbeing Pact that allows for investments steering the transformation towards a wellbeing economy for all.</td>
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<td>The European Parliament (EP) and the Council should agree on reinforced provisions in the directive proposal on pay transparency, especially replacing self-declarations with mandatory external pay audits and add specific requirements for organisations of less than 250 employees.</td>
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<td>The EP and the Council should agree on reinforced provisions of the directive proposal on adequate minimum pay with specific measures for those areas where pay is very low, such as the gender-segregated services sectors and care in particular.</td>
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<td><strong>Trade</strong></td>
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<td>The EU should respect the “do no harm principle”, ensuring no provisions proposed by the EU in trade or investment negotiations undermine gender equality or restrict the adoption of measures to fight climate change.</td>
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<td>The EU should regulate investments by adopting a brown taxonomy, defining which investments are harmful for the planet, with sanctions or disincentives to end them fully and urgently, with a social taxonomy including gender equality requirements.</td>
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<td>The EU needs to develop a robust new sustainable food systems chapter supporting a just transition in agriculture, in Europe and in partner countries, making sure it contributes to transform gender-relations in this sector.</td>
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The EU should envisage a mandatory assessment of social and gender impacts of policies and measures in the National Energy and Climate Plans for the implementation of the Climate Law.

In the roll-out of the Adaptation Strategy, gendered vulnerabilities, paid and unpaid care work, gender-sensitive communication and training, and monitoring and reporting on gender-responsive actions and their outcomes should be addressed and closing the knowledge gap on impacts, vulnerability, adaptation and gender should be a priority.

The EU should include social aspects in the upcoming revision of the Energy Taxation Directive and promote practices such as redistribution of revenues from CO2 pricing to lower income citizens, the vast majority of which are women.

The EU should provide gender-just funding in the energy sector, such as supporting women in all their diversity with energy entrepreneurial loans, mentoring programs and tailored trainings, financial schemes and debt cancellation to reduce energy poverty.

MS need to ensure that rents and other housing related costs do not rise as a consequence of renovations, including rent control mechanisms.

The structure of investment, taxation and monetary incentives should be systematically allocated away from private transport towards flexible, affordable, secure public transport, both within cities and between them, and toward building secure infrastructure for active mobility.

MS and local governments should prioritise building off-peak capacity, reliability, and flexibility of service to better accommodate the mobility patterns of women and people with mobility challenges in intra-city travel.

The EU and MS should drop tax breaks and public investment for aviation and reinvest these funds in safe, reliable, accessible and flexible options by rail (e.g. night-trains) and buses for inter-city travel.

The EU incentives through the CAP need to include provisions for smaller grant and loan applications, as this can facilitate access for various groups, including small NGOs or women farmers.

The new Performance Monitoring and Evaluation Framework of the CAP must consider gender equality.

MS must establish a national target for new women entering in the agricultural sector.

The EU and MS should include gender considerations in all policies and regulations addressing the risks posed by chemicals, including those dealing with workers’ protection, starting by the upcoming CLP and REACH revisions.

The EU should include menstrual products as part of the EU chemicals regulation and management.

MS should lift all taxes on period products including on reusables items such as period pants and make them freely available in schools to fight menstrual precarity, toxic products and waste.

The EU should reinforce its efforts to enact laws and regulations and to strengthen enforcement measures on mercury, especially in skin-whitening creams, such as enacting a regulation and liability regime for online marketplaces and conducting random checks on services and products offered.

2 Gender Statistics Database, European Institute for Gender Equality (EIGE) (accessed April, 2021)
4 Masculine model denotes the idea that what is considered typically ‘masculine’ in the European context is what is right, and anything straying from this norm is othered. What is ‘masculine’ has been created based on patriarchal and colonial structures and is therefore oppressive.
In recent years, environmental and social movements in Europe have been taking to the streets and mobilising offline and online with their demands towards governments to put a halt on climate change, to stop biodiversity loss, to reduce pollution and to ensure social justice. Millions of Europeans have joined these protests following youth leadership for more ambitious solutions to the climate crisis, feminists demonstrating across the region to dismantle patriarchal oppression or racialised communities bringing together large crowds in support of Black Lives Matter marches calling for an end to police violence and systemic racism.

These movements do not operate in a vacuum. The underlying causes are linked: systems of predatory capitalism, patriarchy and racism. Ecofeminist initiatives that link environmental and feminist activism, are being rediscovered around the world, in Europe, for instance, by reclaiming the cycling paths of Brussels for women and LGBTQIA+ people, fighting against nuclear power in France, designing green and feminist cities in Spain or occupying coal mines for climate justice in Germany.

Feminist groups in the US, Canada and across Europe have translated this into concrete policy demands by calling for feminist Green Deals and a fully inclusive narrative of the green transition. In Europe, there is a growing understanding that the green transition must be socially and gender just and that we must solve our challenges in an interlinked manner.

But progressive movements, civil society and activists experience strong pushback. Across Europe, we have seen the rise of far-right governments and discourses leading to a backlash against gender equality and women’s rights as well as the environmental movement. In late 2020, the Polish government enforced an almost total ban on abortion, only exempting cases of rape and incest, and Hungary has passed in June 2021 another anti-LGBTQIA+ law.

Right-wing and neoliberal groups have even sought to co-opt progressive struggles to advance racist agendas in an attempt to pit marginalised groups against each other and to prevent them from concentrating on common root causes. This can be exemplified with ecofascist discourses that blame the demise of the environment one-sidedly on overpopulation and migration, thus using the environmental crisis to justify a xenophobic discourse. Femonalionalism is the phenomenon by which some right-wing and neo-liberal groups line up with claims of the feminist movement to justify racist positions, arguing that migrants and ethnic or religious minorities are inherently sexist and that Western society is entirely egalitarian. For example, the French government implements punitive measures targeting disproportionately racialised men, while it has been demonstrated that sexism and violence against women is present across all sociodemographic groups.

Civil society needs support from progressive governments as well as the European Union (EU) to stand strong against this backlash. The European institutions have regularly remained too shy in their responses to blatant forms of racism and sexism inside the bloc while paradoxically being a vocal advocate for gender equality and women’s rights in international fora.

The European Commission European Green Deal (EGD) and the Gender Equality Strategy (GES) are strong signals that more emphasis is given to both a sustainable future and gender equality. However, many of the proposed elements of the EGD as well as the GES are not ambitious enough in face of the challenges ahead of us. And, even more surprisingly, the European Green Deal and the Gender Equality Strategy have not been designed in an integrated manner.

What are the challenges at hand? First, gender equality has been one of the EU’s core values since its creation with the inclusion of a provision on equal pay for men and women in the 1957 Rome Treaty. However, 75 years later, progress has been desperately slow in
Europe. Women still earn 16% less than men, represent only 29% of members of national parliaments and 1 in 3 women experiences physical or sexual violence in her lifetime. Gender mainstreaming, the process to integrate gender perspectives into the preparation, design, implementation, monitoring and evaluation of policies, regulatory measures and spending programmes, is one of the EU's main tools to advance gender equality. Nevertheless, the European Institute for Gender Equality (EIGE) has shown that gender mainstreaming efforts have been decreasing since 2012. According to Eurostat's monitoring report for the Sustainable Development Goals (SDGs), SDG 5 on gender equality is the only of 17 global goals where the union is not only not progressing fast enough, but where we are actually regressing.

Second, the GES mentions intersectionality but fails to tap into its transformational potential. The measures proposed are vague and do not address the specific needs of people at the intersection of different identity factors. For example, while the GES acknowledges the importance of the care economy and the need to improve working conditions in the sector, it does not recognise that this work is disproportionately performed by lower-class, racialised women and therefore fails to address underlying racist and classist causes.

Last, despite von der Leyen's Commission's strong commitment to a Union of Equality, the EGD, Europe's environmental centerpiece, is largely gender-blind. While some of its elements refer to gender, none of the new strategies and laws so far proposed under its framework are based on a robust gender analysis. Some of its elements may even reinforce gender inequalities. It contradicts the ambition laid out in the GES which calls for more gender mainstreaming in policy sectors where this has been missing so far, in particular mentioning the environment as one of these.

While Europe has started its journey towards a carbon-neutral economy, women and non-gender conforming people cannot be left behind. If our policies aiming at long-term environmental sustainability remain gender-blind, the EU risks to perpetuate existing inequalities. A period of transition is always a moment of deep reflection and reconstruction, offering an opportunity for truly transformative changes. The EU as a leading economic and political power on the world stage has the means to trigger much needed changes.

The European Commission has started to recognize these gaps. It has set up an Equality Taskforce charged with mainstreaming gender equality and wider inequality issues with an intersectional perspective throughout all policy areas. DG ENVI, DG CLIMA and DG ENER have initiated work on building their strategies for gender-mainstreaming. The Climate Social Fund as part of the Fit for 55 Package addresses social and gender inequalities in the journey to carbon neutrality and is a positive step in the right direction. This report aims to contribute to these efforts by explaining the gaps and making concrete policy proposals, in particular in the roll-out of the European Green Deal strategies and policies.

This report also wish to contribute to feminist struggles by translating inclusive ecofeminist thinking into concrete demands for the European environmental policy agenda. We bring together a plurality of feminist theories, analysis, approaches, and traditions, underlying the vitality and diversity of the movement without being prescriptive about the most legitimate or representative approach. We map the gender gaps and opportunities of the European Green Deal in sectors such as agriculture, chemicals, climate, transport and energy while offering a more transformative narrative about political representation and the need for economic system change. Our work is not exhaustive. Topics such as biodiversity, urban planning and circular economy are only partially addressed while they would benefit from greater gender-awareness.

We have deliberately chosen to put an emphasis on the links between gender and environment in internal EU policies rather than external action. The nexus between gender and environment is already better researched and discussed in a global sustainable development context. We recognize and expose the (negative) externalities of EU policies on women's rights and the environment beyond Europe and explore these through two chapters relating to trade and supply chains. We only briefly address gender-based violence and migration. This is not because these topics do not relate to the environment - but rather because research on the links with environmental issues is scarce.

Another interesting aspect we do not directly address in a dedicated chapter is the ecological burden of sustainable consumption that regularly falls on women. Sustainable consumption practices are important for the transition; however, they regularly require more time and energy than less sustainable choices. For example, eating organic, local
and homemade requires extra time to go further than the closest supermarket and to prepare meals. Reusing and recycling rather than throwing things out, Do-It-Yourself laundry detergent or buying clothes in thrift stores rather than simply shopping online takes more time. As care work in heterosexual households is still predominantly performed by women, sustainable consumption practices are likely to fall disproportionately on them, thus creating an additional burden to the existing care load. Policies that push for sustainable consumption need to be based on an enhanced understanding of underlying gender dynamics and need to challenge them.

We follow an intersectional approach to gender issues (as defined in chapter 1). The main factor analysed in this report is gender but where relevant we also address race, class, ability, age, sexual orientation or gender identity as important factors. As there is very little data on how different forms of discrimination intersect, it has proven difficult to systematically apply an intersectional lens.

Finally, we have sought to balance policy recommendations that provide reforms that are achievable now and deeper transformation that are needed in the longer term.

This is the beginning of a longer journey for the EU and Member States to ensure environmental policies are gender-transformative. We hope that this report will open a discussion on the need to accelerate meaningful, inclusive and transformational gender mainstreaming in environmental policies. Our mission is the dismantlement of all systems of oppression for a future where people and nature thrive together.

Ecofeminist regards,
Rose Heffernan, WECF
Patrizia Heidegger, EEB
Nadège Lharaïg, EEB
Anke Stock, WECF
Katy Wiese, EEB

1 Les Déchainé.e.s, (Accessed June 2021)
2 Bombes atomiques, (Accessed June 2021)
1 For more info, you can have a look at the Mapping of ecofeminists initiatives in urban planning made by Ecologistas en Acción: https://www.ecologistasenaccion.org/mapas/mapeoecofem/
4 Francisca Rockey, “The danger of ecofascism and why it is a veneer for racist beliefs”, Euronews-green, 21 March 2021, (accessed in June 2021)
5 Sara Farris, In the name of women’s rights: The rise of femonationalism, (Durham: Duke University Press, 2017)
8 All figures come from the European Institute for Gender Equality
I

CONCEPTS
THE THEORY BEHIND THE ANALYSIS: AN EXPLANATION OF OUR UNDERSTANDING OF NON-BINARY INTERSECTIONAL ECOFeminism

By Anke Stock and Rose Heffernan
The theory behind the analysis:

**Anke Stock** (she/her/hers) I am a lawyer with a doctorate in EU anti-discrimination law from the Humboldt-Universität of Berlin and I am an experienced expert in gender issues and sustainable development. Before joining WECF’s Munich office in 2005 I worked for human rights organisations in London focusing on gender equality and consultancies for various UN entities. My special focus areas are gender mainstreaming into environmental and climate change projects and policies as well as public participation. I am a board member of WECF and of the EEB.

**Rose Heffernan** (she/her/hers) I have been working at WECF since January 2021 engaged in international UN processes such as the Commission on the Status of Women, the High-Level Political Forum, and UN Women consultation processes. My previous work was centred around national identity in Central and Eastern Europe, the Istanbul Convention, anti-climate change ideology and other international politics and inequalities issues. These experiences inform my work at WECF, utilising an understanding of intersectional identities to explore the gender-environment nexus.

**Reflexivity:** We are two white cisgender women from Germany (Anke) and Scotland (Rose) and we are aware that we write from a place of extreme privilege. In discussing the concepts of LGBTQI+ inclusion and intersectionality, we cannot speak on behalf of any groups and can never understand the lived experiences of many that face discrimination due to their gender identity or race. Instead, our aim was to quote people accurately and explain how our understanding of these concepts is related to this report. It should be acknowledged that these concepts are the result of tireless fighting by activists to challenge the mainstream narrative, and what follows is a summary of such ideas rather than a co-option of them.

**Women Engage for a Common Future (WECF)** is a network of 150 women’s and environmental organisations in 50 countries. For 25 years, WECF aimed at strengthening female leadership and gender equality in the field of sustainability. We do this by working on three key areas: sustainable development, climate and environmental action and a non-toxic society, always from a feminist perspective. With our activities aimed at capacity building, influencing policy and raising awareness, we strengthen the position of womxn worldwide.

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**THE THEORY BEHIND THE ANALYSIS:**

**AN EXPLANATION OF OUR UNDERSTANDING OF NON-BINARY INTERSECTIONAL ECOFEMINISM**

This report aims to unveil the existing gender gaps in the European Green Deal (EGD) presented in December 2019. To allow for a closer look at these gaps it is necessary to define which perspective on representation in terms of gender is taken. According to the European Institute for Gender Equality (EIGE) ‘gender’ refers to the social attributes and opportunities associated with being male and female and their respective inter-relationships. These attributes, opportunities and relationships are socially constructed and are learned through socialisation processes.\(^1\) However, this report encompasses a broader understanding of gender equality. The conflation between sex and gender can be harmful as it assumes that bodies are inherently matched with gender identities when this is not always the case. Sex is often assigned at birth based on namely genitals. Gender can be conceptualised as the complex interrelationship between somebodies’ physical body, their identity (how they view their gender), and their social gender (the attributes society gives\(^2\)). This interrelationship is...
dynamic, these categories are not fixed and therefore a persons’ gender can change with time. Additionally, the dynamic nature of these different factors highlights that gender is not a binary (male-female). Within this chapter we intend to explore how the concepts of ecofeminism, intersectionality and non-binariness interact and even broaden the gender gaps and thus inequalities of the EGD.

Equality and non-discrimination are core values and fundamental rights of the European Union (EU), enshrined in its Treaties and in the Charter of Fundamental Rights of the European Union. Several directives protect the right to equality and non-discrimination on various grounds and beyond legislative developments and established case law, various policy initiatives try to implement a cohesive approach to mainstream gender equality. The 2020 Gender Equality Strategy, as well as the LGBTIQ Equality Strategy are part of a range of newly adopted strategies of the European Commission promoting a more diverse and inclusive approach within EU policymaking.

The EU Gender Equality Strategy (GES) aims to mainstream gender explicitly using an intersectional approach following the EIGE definition of the concept. However, how this will be implemented remains unclear. Chapter 4 of the GES is dedicated to gender mainstreaming and intersectionality, however it does not suggest concrete action and does not go beyond referring to other inclusive strategies and the need to pursue an intersectional approach. The strategy lists grounds of discrimination that ought to be considered at the intersection of gender, which suggests that these other identities are viewed in an additive way, rather than the intersectional idea that they work together and reinforce each other.

The LGBTIQ Equality Strategy is more detailed, emphasising the need to integrate a LGBTIQ equality perspective into all EU policies as well as into EU funding programmes, concretely demanding technical assistance and methodological support on the design and implementation of data collection exercises on LGBTIQ people.

This new inclusive focus is a positive trajectory from the EU Commission’s new roles aiming at integrating an equality perspective into all EU policies and initiatives, even though concrete tools and activities addressing this in an intersectional way are missing. Up until now, these ambitions are mainly centred across socio-economic policies as also foreseen within the European Pillar of Social Rights and its 20 key principles (e.g., labour market, migration, and health). But the omission of the need to mainstream equality into environmental policies, beyond some feeble starting points regarding climate change and energy poverty, is problematic. By analysing the EGD from a non-binary, intersectional ecofeminist perspective, existing strategies can be tied together to create a more cohesive base for future policymaking. In this chapter we set out our understanding of these key concepts and how they relate to our understanding of the European Green Deal.

**Ecofeminism**

Ecofeminism emerged as a concept during the second-wave feminist movement of the 1970s. The phrase ‘ecological feminism’ was first used by Françoise d’Eaubonne in 1972, although since then the concept has been considered in different contexts and subsequently expanded upon. Rosemary Radford wrote in 1975 that there is no liberation for women and no solution to the ecological crisis within a society that’s fundamental mode of operation is domination. By highlighting the Self-Other relationship, in which the ‘self’ dominates and oppresses the ‘other’ ecofeminism unpacks the binary self-other categories that underpin western philosophy, colonialism and patriarchy. For example: ‘man’ – ‘woman’, ‘straight’ – ‘queer’, ‘white’ – ‘non-white’. The oppressed ‘other’ is bound by the same structures and institutions that have fuelled ecological destruction and the climate crisis. Ecofeminism argues that the climate crisis and oppression of marginalised groups are intertwined, and that neither issue can be solved independently.

A focus on all marginalised ‘others’ allows for an understanding of how environmental policy can impact marginalised and vulnerable groups. Ecofeminism addresses the critical issues of our time, such as toxic production, unjust trade, development, as well as proposing a vision of new politics and economics. For example, an ecofeminist approach to citizenship calls into question the ‘public’ – ‘private’ divide, showing how women are often restricted to the private sphere, in particular within unpaid care work, where they can make less decisions that shape society and governance. An ecofeminist political economy highlights how both women and nature are externalised and undervalued by current economies. Additionally,
the values attributed to masculinity and femininity have an important role to play in the environmental movement. Toxic masculinity is the concept that some masculine ideals have become toxic or dangerous due to their origins in violent systems of oppression such as patriarchy and colonialism. In relation to the environment, this has manifested itself in a myriad of ways: one being the idea of ‘petro-masculinity’. This concept highlights how toxic ways of thinking about masculinity and femininity have led to the idea that petrochemical usage is masculine (and therefore desirable for men in power), in part due to the historic role of petrochemicals in buttressing patriarchal rule.17

In order to address these inequalities, some institutions have introduced ‘gender mainstreaming’ into policy design. This involves the inclusion of a gender perspective into policymaking, to understand how decisions can affect genders differently. This has largely been done in relation to a binary concept of men and women, and gender mainstreaming has lagged in environmental policy and has been applied unevenly within this sector.18

As the Ecofeminist movement has evolved and developed into a complex discourse, it is important to outline our understanding of the concept. Some branches of ecofeminism romanticise women’s apparent closeness to nature and use this for justifying an ecological and feminist viewpoint. Yet this theory assumes facts about women and their role and is erroneous in doing so. Additionally, it has been critiqued for just focusing on ‘nature’ and ‘women’.19 This is in part due to its origins in the second-wave feminist movement, which has been critiqued for its narrow focus on CIS heterosexual white women. These narrow conceptions have largely been broadened by LGBTIQ and Black Indigenous People of Colour (BiPoC) activists who utilise an intersectional conception of ecofeminism. It is our understanding that ecofeminism must be intersectional and non-binary to truly be effective. Ecofeminist Asmae Ourkiya makes a powerful statement:20

“Sexism, racism, homophobia, and transphobia are systemic forms of oppression that shape our relationships with each other by designing a hierarchical pyramid...This translates into how natural spaces are accessed and exploited.”

As it is predicated on dismantling binary Self-Other relationships within this hierarchical pyramid, only through an intersectional understanding of all oppressed ‘others’ experiences, can we understand the patriarchal colonial structures of oppression that contribute to inequality whilst hindering a green transition. Below we outline our understanding of both intersectionality and non-binary, to further explain our application of ecofeminism in this project.

Intersectionality

Today at the EU level the concept of intersectionality is often understood as a ‘tool for studying, understanding and responding to the ways in which sex and gender intersect with other personal characteristics/identities, and how these intersections contribute to unique experiences of discrimination’ (EIGE).21 A person’s opportunities as well as his/her/their experiences of discrimination depend on the interplay of social categories on multiple and simultaneous levels. Everyone experiences privilege and discrimination that are rooted in existing systems of oppression, such as patriarchy, capitalism, racism, and colonialism to name the most common.22

Black scholar Kimberlé Crenshaw shaped the term ‘intersectionality’ with her work around people’s multiple identities, in particular within the US feminist and anti-racist policies.23 She developed the legal concept to harness its potential in the movement building of BiPoC women against their exclusion from white feminists’ voices. Crenshaw analysed the impact of the interlocking of marginalised identities and their relation to systems of domination and discrimination.24 Since then, the concept of intersectionality has become part of, inter alia, mainstream feminism, leading partly to a loss of its core aspects around race and power. In Europe, intersectionality has rendered race invisible as race is deemed obsolete in the legal sphere and data collection on the grounds of “race” in most EU countries, such as in Germany, does not happen. As the Centre for Intersectional Justice (CIJ) and the European Network Against Racism (ENAR) put it: ‘...the discourse in Europe focuses on racism as an exceptional phenomenon, refusing to address its historical, structural and institutional dimensions’.25 The emphasis on individual identities of people instead of a holistic view on structural and institutional power hierarchies are other factors contributing to a deprivation of the clout of this concept. This leads to a depoliticization of the concept and thus intersectionality
loses its original power leading to a re-marginalisation of BiPoC women. The GES framing of intersectionality could be seen as a loan from a community movement not living up to its original transformative significance.

Within this report we want to use this concept to assist us to identify institutional and systematic discrimination and exclusion (on all grounds) and provide a way towards real transformation beyond the EGD’s goal of ‘transforming the EU’s economy for a sustainable future’.

For our report that means, e.g., when looking at energy poverty in Europe we are aware of gendered differences of those experiencing inadequate levels of essential energy services. But we know that gender is not the only relevant factor and intersectionality helps us to look beyond this one inequality dimension. The socioeconomic status and/or race are equally important factors contributing to whether a person is living in energy poverty or not.\(^{27}\) Analysing the root causes of energy poverty as well as the design and development of targeted interventions require representative data and information that take intersectionality into account, e.g., data collection on gender and race.

**Non-binary**

Alongside an intersectional ecofeminist perspective, it is important that we outline our concept of ‘gender’ beyond the EIGE definition within this report. US American scholar Greta Gaard coined the term ‘queer ecofeminism’ in her 1997 work, further expanding on the ecofeminist concepts outlined above.\(^{28}\) Queer ecofeminism argues for the liberation of all oppressed groups in line with the goals of the environmental movement and focuses on queer groups’ historical oppression. This mode of analysis shows us that the Self-Other relationship in western philosophy has been largely predicated on the straight ‘self’ oppressing the queer ‘other’.\(^{29}\) Additionally, those living out with the gender binary face further oppression, as the binary concept of ‘men’ and ‘women’ is historically a westernised mode of thought that was perpetuated under colonial conditions. Gender itself is a concept based on the construction of systems of difference, and the assumed naturalness of pairing certain genders with certain bodies needs to be deconstructed.\(^{30}\) Deconstructing and dismantling this binary idea of gender is intertwined with the environmental movement, as both fight against the same structures of oppression. This common fight has been stated by queer environmentalists,\(^{31}\) wishing to challenge the structures that both oppress and devalue them and the natural world. Queer ecofeminism links the struggle of feminists, LGBTIQ activists and environmentalists, by highlighting intersecting forms of oppression faced by groups that have been historically considered the ‘other’ within western philosophy.

A feminist theory that adheres to a fixed binary of gender cannot be intersectional.\(^{32}\) The EU’s LGBTIQ equality strategy for 2020 – 2025\(^{33}\) sets out norms for addressing the exclusion of LGBTIQ groups, as well as noting the importance of understanding and valuing the lives of those out with the gender binary. Gender mainstreaming in EU policy should challenge existing gender norms (instead of the archetypical man, women in an unequal relationship in one household), so that exclusionary concepts of gender are not reified.\(^{34}\) An expanded concept of gender should be incorporated into the European Green Deal, as trans and non-binary groups are also likely to face different pressures under a green transition, that will be obscured by a binary approach. For example, marginalised LGBTIQ groups are more likely to be homeless\(^{15}\) and face social exclusion. Those that are disregarded and face precarious living conditions are more likely to be affected by climate change, such as extreme weather, air pollution and chemical exposure.\(^ {36}\) Additionally, examples from the Global South\(^{37}\) and America\(^{38}\) show that non-binary and transgender people face additional persecution in the aftermath of natural disasters. These natural disasters are also increasing in Europe due to climate change.\(^{39}\) LGBTIQ groups face multiple and intersecting forms of discrimination, that can impact their resource access, as these groups often have lower economic and social status within their community. These sectors (economy, health) are focused on within the European Green Deal, and so a thorough intersectional approach to environmental policy would incorporate the lived experiences of those out with the gender binary. LGBTIQ groups can also be active agents of change in environmental policymaking. Their experience of discrimination as part of the capitalist and colonial structures perpetuating environmental degradation, resource depletion and climate change can help in our understanding of and dismantling of these modes of operation. The green transition has the potential to bring marginalised voices to the centre, in coalition with each other on environmental issues.\(^{40}\)
Queer ecofeminism has its limitations, the most important being a lack of data and case studies using it as a basis for analysis. Linking our understanding of the concept with the rest of the work in this report, it is useful to highlight an intracategorial approach to ecofeminism. This approach acknowledges different social groups in society but is sceptical about current methods of social categorisation. So, whilst we aimed to have a non-binary, ecofeminist, intersectional approach, we are hindered by lack of existing data. This in part validates the importance of a further understanding of gender as a spectrum, by collecting data on the lived experience of transgender and non-binary individuals.

Conclusion

We have strived to articulate a non-binary approach wherever possible, to move away from essentialist discourse. However, this is easier in some chapters than others. For example, data collection in a lot of areas relating to the EGD has been binary, due to methodological and cultural limitations. It should be noted that in utilising existing data or using terms such as men or women, we make no assumption about the gender identity of individuals and place no normative assumptions on bodies. It is our goal to move away from essentialist categories and towards an inclusive, non-binary approach.

Additionally, intersectional analysis can also be difficult to implement due to data limitations. This project advocates for more intersectional data collection in Europe, by disaggregating data along different lines of self-identification. The authors in this report have been encouraged and motivated to include an intersectional perspective in their chapters. This was in part done by inclusive language guidelines, encouraging author reflexivity, and following up on intersectional aspects in the editing process.

We understand that having inclusive language, is not enough. In order to be truly inclusive, a concrete understanding of the lived experiences of not just cis men and women, but women, men and gender non-conforming people in all their diversity is needed. We hope to raise awareness around the lack of data in this regard, and to advocate for an environmental movement in the EU that considers and betters the lives of all of Europe's citizens.

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2 “Understanding Gender”, Gender spectrum (accessed June 15, 2021)
3 It should also be noted that sex is not binary, as people can be born intersex or with varying sexual characteristics
In this chapter we use the term LGBTIQ instead of LGBTQI+ as this is the terminology of the EU's LGBTIQ strategy.


Francoise, D'Eaubone 1972. In: Jytte Nhanenke, Ecofeminism: Towards Integrating the Concerns of Women, Poor People, and Nature into Development (Lanham: University Press of America, 2011), Ch. 3


Nhanenke, Ecofeminism, ch.3

Sherilyn MacGregor, "From Care to Citizenship: Calling Ecofeminism Back to Politics", Ethics and the Environment, Vol. 9, no. 1 (2004): 78


Asmae Ourkiya, "Queering Ecofeminism: Towards an Anti-Far-Right Environmentalism", Network in Canadian History & Environment, Original publication June 23, 2020 (accessed April 9, 2020)


Clj/ENAR, Intersectional discrimination in Europe: relevance, challenges and ways forward (Brussels: European Network Against Racism, 2019), 7


Carol J.P. Colfer et al., Making sense of intersectionality: A manual for lovers of people and forests (Indonesia: CIFOR, 2018), 4

Clj/ENAR, Intersectional discrimination in Europe, 11

GES defined intersectionality as:“An analytical tool for studying, understanding and responding to the ways in which sex and gender intersect with other personal characteristics/identities, and how these intersections contribute to unique experiences of discrimination” (European Commission, A Union of Equality: Gender Equality Strategy, 2020-2025)


Ibid.

Laura Houlberg "The End of Gender or Deep Green Transmisogyny?" in Routledge Handbook of Gender and Environment, ed. Sherilyn MacGregor (Oxon: Routledge, 2017), 483

Justine Calma, "Yes, trans rights are an environmental issue, too", Grist, Original publication October 29, 2018 (accessed April 9, 2020)


Seema Arora-Jonsson "GENDER AND ENVIRONMENTAL POLICY", in Routledge Handbook of Gender and Environment, ed. Sherilyn MacGregor (Oxon: Routledge, 2017), 206


Anuj Behal, "How climate change is affecting the LGBTIQ+ community", DownToEarth, Original publication January 11, 2021 (accessed April 9, 2021)


Behal, "How climate change is affecting the LGBTIQ+ community" (accessed April 9, 2021)


Houlberg, “The End of Gender or Deep Green Transmisogyny?”, 484

We Push for a Decolonial Perspective on Climate Justice

Credits?

By

II
INCLUSIVE REPRESENTATION FOR STRONGER OUTCOMES FOR PEOPLE AND PLANET
ENSURING INCLUSIVE REPRESENTATION IN EU (ENVIRONMENTAL) POLICYMAKING

By Nadège Lharaig, Meera Ghani and Celine Fabrequette
ensuring inclusive representation in eu (environmental) policymaking

In April 2021, the #sofagate, where Ursula von der Leyen, the first women president of the European Commission, was downgraded both physically and symbolically as a subordinate to European Council President Charles Michel in a joint visit to Turkey, was yet another reminder that women in politics are still not normalised or respected.

The improvement of inclusive representation is an essential step towards more gender-just environmental policies. And we are currently far from it in the European Union (EU).

**Celine Fabrequette** I have a degree in EU Law & EU Social Affairs and I am a policy officer for ECOLISE and the founder of #DiasporaVote!. The EU represents the idea of freedom of movement which is a great way to promote cultural exchange, acceptance, and integration. But the solidarity, equality and integration I dreamed about has been disappearing more and more over the years. So I got involved; using my EU access to create spaces and good chaos for youth and women.

**Meera Ghani** I earned an MSc in Environmental Economics from the University of York. In addition to my work with ECOLISE, I am the co-founder of the Moxie Consultancy Collective. Prior to this, I worked for over 15 years with various NGOs on climate justice and human rights and advised the Government of Pakistan on its climate policy and was a part of its delegation to the UN climate negotiations for five years. I also provide training, facilitation and mediation services to organizations on racial equity, power & privilege, decolonization.

**Nadège Lharaig (she, her)** As a Senior Policy Officer on Sustainable Development & Gender Expert at the EEB, my work focus on developing policy and advocacy on sustainable development and the links between gender and environment. I am a committed intersectional feminist, worked and volunteered with many feminists NGOs in France. I am writing with the perspective of a French middle-class woman with Algerian origins and acknowledge the privileges and bias that might come with it.

**ECOLISE** is the European network for community-led initiatives on climate change and sustainability. It is a coalition of 44 member organisations from 18 countries who are engaged in promoting and supporting local communities across Europe in their efforts to build a healthier, fairer, sustainable future. Broadly, it brings together the Transition, ecovillage and permaculture movements.

**#DiasporaVote!** is an initiative aiming at offering more representation and inclusion to the Black Indigenous People of Color (BiPoC) diaspora communities living in Europe by encouraging youths and non-youth to get involved in the development of the EU policies, helping them understand how these policies shape their daily lives and by stimulating them to think of ways to improve the lives of the BiPoC diaspora in Europe.

**The European Environmental Bureau (EEB)** is Europe’s largest network of environmental citizens’ organisations. We bring together over 160 civil society organisations from more than 35 European countries. We stand for sustainable development, environmental justice & participatory democracy.
In line with other policy areas, environmental policymaking is not representative of society and as such fails to address the gender, race, and class implications of the environmental crisis. As of April 2021, 47% of the European Parliament (EP) Environmental Committee are women and only 30% of the EU environmental ministers in Member States are women. If we look at the climate diplomats that the EU sends to the United Nations Framework Convention on Climate Change Conference of the Parties (UNFCCC COP), the largest global environmental gathering, 41% of delegates were women in 2019 and only 35% in 2015 when the Paris Agreement was reached. This confirms the analysis of the Women’s Environment & Development Organization (WEDO) that women’s participation is lower at meetings where important decisions are taken.

The European Green Deal (EGD) does not propose measures to rebalance the lack of inclusive representation in environmental policymaking. Additionally, it fails to mention political representation nor does it set targets on women representation while they remain underrepresented environmental policymaking. It touches upon participation of citizens in the Climate Pact but with a reduced mandate, this body is not a viable alternative to representation. In the Gender Equality Strategy (GES), the European Commission mentions the promotion of women candidates for the 2024 elections and reaching gender balance at all-level in the Commission. However, the GES does not apply an intersectional framing, thus showcasing the Center for Intersectional Justice’s (CIJ) observation that “European legal and policy frameworks have traditionally relied on addressing discrimination through a single-axis angle”. The ignorance of intersectionality prevents climate actions from being effective and meaningful.

In this chapter, we will examine three crucial issues to achieve inclusive representation: striving for more inclusive representation in (environmental) policy making, acknowledging the issue of tokenism grounded in racism and sexism and how the violent work culture of politics, linked to patriarchy, can be overcome.

Ensuring inclusive representation

When looking at who is being represented by whom there are three things to ask oneself: Do I see myself being represented? How can I engage with those who represent me? Will it matter?

White men often easily answer those questions with a yes. For white women, on the other hand, the answer is often no, and if one looks deeper into marginalized groups then the answer for People of Colour, Roma, LGBTQI+, disabled, Muslims or young women is almost always no. The lack of EU-wide data on political representation of different groups of women hinders an accurate representation of society within policymaking and decision-making rooms and makes for ineffective gender strategy, environmental policy or for that matter any EU policy. The inaccurate data representation also contributes to reproducing prejudices towards women politicians in media coverage, both in party communication and by journalists. This becomes evident either through lack of coverage or negative coverage which focuses on their physical appearance, tone of voice, notions of motherhood instead on the women’s expertise and experience. Nevertheless, the growing youth participation indicates that not all is lost. The 2019 European election brought an increasing awareness regarding youth representation in the European Parliament, where at least 60% of the Member of the European Parliament (MEP) are first time runners and as it stands since January 2021 women represent 38.9% of elected MEPs. What is evident from the 2019 elections is that when the youth participate and vote, it is more likely that candidates with diverse backgrounds get elected. For example, we also see more ethnic diversity coming from EU countries which had never elected Black Indigenous People of Colour (BiPoC) before to represent them at EU level. This election behavior can be traced back to the higher awareness among youth regarding diversity dimensions, e. g. gender identity, class, or ability.

This EU parliament is much more environmentally focused, which we can see being reflected in the Commission’s work, through mainstreamed climate action (EGD), an attempt to also mainstream gender but it is confronting a glass ceiling within EU policy. It is then accurate to assume that if more youth and women from diverse ethnic backgrounds were to engage and vote massively then the EP will look more like the citizens it represents.

Voting is not the only realm where we need to see more underprivileged women at the helm, we also need political parties to stop creating barriers for marginalized women to run or have them teammate with a man. When women are running together with a man, even if on the surface it looks like a good idea, it can diminish their power, their speaking time and/or
ensuring inclusive representation

It has been proven that proportional representation is more effective in promoting the election of women, including those with different ethnic backgrounds, disabilities and the LGBTQI+ community. However, we see a lot of resistance from mainstream political parties to introducing this at the national level because proportional voting systems would give more seats to far-right representatives.

When it comes to women’s representation, questions of power and effectiveness are essential. In the European Parliament there are 3 committees related to environmental issues according to the European Institute for Gender Equality (EIGE). And when looking at the work allocation, we see that men are often the rapporteurs as well as group coordinators, nominations that give more responsibilities and work. In the Environment Committee, where rapporteurship is more or less balanced, the portfolios reveal that women are essentially rapporteurs on gender stereotypical topics, e.g., health issues. We also observed that MEP Pascal Canfin is leading many of the environment files, especially those linked to economics. As rapporteurs have an important role in the drafting and development of amendments, having only men leading economics files is likely to lead to the exclusion of women’s perspectives and needs in these areas.

What can be done now to ensure diverse representation in the next round of elections in 2024? We need to ensure better consultation, until we have representatives who reflect Europe’s society. We must work on ensuring that women, especially those from marginalized communities (BIPOC, LGBTQI+, youth, and people with disabilities) are consulted. Effective consultation relies on several things: resources, location, safer spaces, and outcomes. Money and time are rare resources among marginalized groups of women. This is linked to the high burden of care work and their economic status. Thus, consultation initiatives where representatives are aware of the time and financial limits of the affected groups, are likely to be more successful. Also, representatives must go to neighborhoods of affected communities rather than having these people come to them. But most of all, for a successful consultation to take place, people need to know what their contribution will lead to. Often, consultations are done, but there is no follow-up given by the policymakers to the participants.

Environmental policymakers must start to acknowledge that climate solutions will fail if they continue to silence/ignore marginalized voices. Because the transformation they intend to bring will not lead to any real change on the ground. The marginalized and the vulnerable are the most affected by and the most conscious of climate resilience and environmental change. Often this is based on the knowledge and solutions already implemented by affected communities to deal with daily challenges. Environmental policymakers need to embrace community-based knowledge, and need to apply intersectional gender mainstreaming, failing to do so will reproduce harmful policies for marginalized communities.

Recommendations:

- Implementation of parity measures, such as the model of France and expanding its application to ensure an inclusion of women in all their diversity.
- EIGE Gender Equality Index should include indicators for race and ethnicity and look at other intersecting inequalities.
- Limit political mandates to ensure a recurring renewal of policymakers.
- Consulting with groups representing women and Women of Colour (WoC) in environmental activism and advocacy, creating mechanisms for routine and transparent engagement on policy issues.
- The EU should develop more mechanisms of participative democracy. The initiative Work with your MEP, that brings young people from the diaspora to engage with MEPs is a good example. In this program a group of 10 young people are working with MEP Saskia Bricmont on a resolution on the upcoming EU Action Plan on Textiles.

Going beyond tokenism

As the world wrestles with an unprecedented public health crisis that is disproportionally affecting women and BIPOC, excluding them from leadership is a recipe for failure. For example, racialized communities have long been excluded from environmental policy - creating a lack of perceptions that perpetuate inequality. Many solutions to natural resource concerns are often experienced as environmental gentrification by communities of colour, take bike lanes for example, which are often carved through areas where parking space is
ensuring inclusive representation

scarce and public transportation is already minimal. As detailed in Chapter 3 of this report, whenever Black and Brown environmentalists talk about race there is a severe and defensive pushback. Racial equity is seen as something external or extra and is not understood the same way sexism is, for example. And this is where what is known as “white feminism”16 fails Black and Indigenous women and WoC, where the push to achieve gender equality is front and centre, but how that links to racial equity and other forms of intersectional oppressions is considered peripheral to the issues being discussed or challenged.

Tokenism can be hard to explain to someone who has never experienced it. It is when you are not a part of the majority group or dominant culture and are invited for a consultation, or to make a presentation or a small gesture is made to include you in some very small way. Within a workplace setting it is the use of someone’s identity in order to check a diversity box.17 Organisations think that by hiring only one person that somehow fits into the layers of diversity they would appear more inclusive. Hiring just one person of any underrepresented demographic is a quick-fix “solution” to a systemic problem. It isolates the person and increases focus on that person’s actions, often making them out to be the gatekeepers of their gender identity, race, religion, or class. Thereby tokenizing can put the person under additional mental stress and expose them to further discrimination. It is the opposite of equity, diversity, and inclusion (EDI). If organisations tokenize marginalized groups, they do not value their skills. Au contraire, they apply discriminatory assumptions to justify their understanding of representation. And since diversity topics have gained more traction in the public debate in Europe, tokenism has also happened in politics.

Women in general are seen as less credible candidates for politics than men,18 and even when they are allowed to enter these roles there is a pattern of silencing and discrediting that takes place which makes the political workplace a very toxic environment for them. When parties or governments are questioned about the lack of diversity or are going through an internal crisis, it is when we see them bring in women or WoC into leadership positions. A prime example of this was Brexit, where Teresa May was left to handle what her predecessors had started. There are many similar examples, not just in governments, but in organisations and institutions, where women being in power can be lauded (the glass ceiling)19 but, at the same time, be made to deal with a mess that was not of their own making (the glass cliff).20 Despite being put in these difficult positions without being given much leeway, many of these women have not only dealt with the situation as well as they could but have also dealt with being in a position of power well.

Because of the lack of intersectional representation and active participation of BIPOC in all positions, policymakers have been stuck in Eurocentrism - and dealing with it requires deeper analysis by the white middle-class people who largely control the climate justice discourse. There is a strong sense of entitlement within the leadership at the helm of the environmental policymaking regarding their role as the rightful saviors of the environment, while having a deep disconnection from specific lands as a source of life, food, medicine, or community.

The sense of urgency and panic around the collapse of nature and the climate crisis can lead to a dismissal of dealing with social justice issues. Hence tokenism is lip service to the issues being brought up by many women of colour within the EU policymaking circles, but always within the existing framework of power.

It is hard to build real relationships between environmental groups and racialized and marginalized communities when power is not acknowledged. When the narrative around environmental and climate justice is all rhetoric and not embodied in any real sense. Tokenism does real harm to not only those who are tokenized but on how we build towards a world we want, how we build towards transformative change, how we build towards justice. Real inclusion creates room for exploring more progressive policies, approaches, particularly Indigenous and local knowledge that was overlooked or destroyed through colonial and post-colonial structures and institutions. It creates room for belonging. It creates room for community and care.

Recommendations:

- Promoting, enabling and amplifying a political environment that guarantees power and agency. In practical terms this could include fostering more support for the inclusion of marginalized communities in the discourse and debate, (e.g., black Indigenous, Rom*nja and Sintezzi etc) and having intersectional criterion when reviewing candidates running for European elections and fair and accessible funding.
- Women, especially WoC, need to be given more space in environmental policymaking because not only do they have the knowledge and expertise, it will also take a broader
ensuring inclusive representation

... should be done through criteria focused on recruitment of candidates and anti-discrimination and equal opportunity policies. Recruitment of diverse candidates often overlooks the power dynamic within the organisations and institutions, which requires examining the structures and systems before hiring takes place.

- Political organisations should be made safer for women and WoC by putting in place policies and practices that create mechanisms for accountability and support.

Overcoming the discriminatory and violent culture in politics

Preventing gender-based violence and discrimination at work have solid legal grounds in the EU foundation especially in the Charter of Fundamental Rights,21 the Equal Opportunities22 and Equal Treatment Directive23 and more recently in the International Labour Organisation (ILO) Convention on Violence and Harassment in the world of work24 that recognises for the first time the intersectional aspects of these phenomenon. Despite that, the work culture in politics continues to be embedded in gender-based violence and discrimination that undermines women and discourage them from engaging or staying in these career paths. Patriarchy is foundational to this culture and men, who mainly benefit from it, need to acknowledge it and question their privileges.

A study from the Council of Europe25 found that 40% of women national Member of Parliaments (MPs) in European countries were victims of sexual harassment in their work and that the level of reporting was only between 6 to 25% depending on the nature of the abuse. The MeTooEP movement in 2018, started to unveil the breadth of the problem within European institutions. Women working in the European Parliament came forward to denounce the abuses, violence, and discriminations they were – and are still – facing, as well as the culture of silence entrenched in the very imbalanced power relations between men and women in politics as well as between MEPs and other staff. The perpetrators are across political parties as the cases of Gerald Darmanin, France’s current right-wing Interior Minister27 or Steve Stevaert, from the Flemish Socialist Party28, remind us.

The European Parliament and the European Commission have reinforced their internal policies to address sexual violence in the past years. While acknowledging progress with the set-up of dedicated bodies to receive and handle complaints, support measures for victims and information campaigns, there is still room for improvements. For example, MEPs are sitting in the body responsible for investigating other MEPs harassment, questioning the impartiality of the committee, and probably being a cause of high underreporting of these abuses. Procedures are also often long and complex before sanctions are enforced, with the victims potentially seeing their abuser in the office and bringing opportunities for silencing, intimidation and gaslighting.29

Sexual harassment is just the tip of the iceberg as women in policymaking face a whole range of discrimination, bullying, sexist stereotypes and insidious sexism such as mansplaining,30 manterrupting31 or boy’s club phenomenon.32 Women at the intersection of different forms of oppression face additional burdens as these attitudes are mixed with racism, ableism, classism and homophobia. These very common facts are all part of the same continuum of toxic masculinity that dehumanizes and denigrates women and queer people.

Thus, much more must be done to challenge this culture. In the short term, solutions could include making training on discrimination and violence mandatory (rather than voluntary) for all EU staff, including policymakers. These should address gender-based discrimination and violence, unconscious bias for the whole spectrum of discrimination characteristics and their intersections and how to react when you are a bystander. In the long run, having more diversity in the elected representatives and integrating more gender mainstreaming in policies would challenge the toxic masculinity culture embedded in politics and ultimately reduce the level of discrimination women face in these spheres.

Recommendations:

- Improvement and better enforcement of the EU Institutions workplace policies to fight gender-based discrimination and violence, with external investigation bodies and mandatory trainings for all staff, including policymakers.
- Promotion of a healthier work culture in politics by including in policies and practices a zero-tolerance for toxic masculinity, boys club, or gaslighting and encouraging men to be better allies rather than bystanders.
Develop human resource measures inside political institutions and parties for better work-life balance, including lower working hours and stronger parental benefits.

Swift ratification by all Member States of the ILO Convention on Violence and Harassment in the world of work and ambitious implementation.
NOTHING ABOUT US WITHOUT US
HOW THE ENVIRONMENTAL MOVEMENT NEEDS TO DO BETTER

By Myriam Douo
The main problem with EU policy-making is that it works in silos and does not have an intersectional approach. Take the EU’s Anti-racism Action Plan¹, for instance, which does not acknowledge environmental racism. The reality is that marginalised communities around the world – intentionally or unintentionally – often face the worst effects of environmental hazards, such as air pollution, and dumping of waste – including toxic waste.² Studies show that racialised communities have higher chances of living near industrial areas, major roads, mines, power plants and dumps. As a consequence, both in the Global North and South, racialised communities have higher rates of illnesses due to air, water and soil pollution. The same communities are often denied the right to a healthy and good quality living space and amenities such as parks, and have the least access to resources and power to challenge this injustice. This is environmental racism. This concept is crucial as it encompasses discrimination in policy-making and the implementation of environmental policies but also the exclusion of racialised communities from the environmental movement. Indeed, leaving out racial inequality leads to the erasure of some racialised people,³ especially people at the intersection⁴ of different forms of racism and discrimination, such as gender-based discrimination.⁵

This happens everywhere: from mainstream media giving more attention to white climate activists (and sometimes literally erasing people of colour from the movement such as when the Associated Press erased climate justice activist and organiser Vanessa Nakate from a picture taken at the Word Economic Forum in Davos in 2020);⁶ to mainstream environmental organisations being overwhelmingly white (and also erasing people of colour from the movement, such as when Greenpeace erased climate justice activist Tonny Nowshin from action pictures, 6 months after the Nakate scandal!);⁷ to climate policies completely ignoring social and racial inequalities.

One of the new EU Climate Pact’s values⁸ is ‘Diversity and Inclusiveness’ and it seeks to ‘pull down barriers to climate action’. It happens regularly that EU institutions claim to be open to inclusive participation and think that it is enough. They expect citizens to do the work as opposed to them making the effort to meet people where they are, especially people who have been neglected by the EU for so long.

Because of this technical and distant functioning of the EU, there is very little chance that the EU Climate Pact will gather participation from racialised communities living in
marginalised neighbourhoods or peripheral rural areas. However, it is also due to European environmental organisations excluding racialised communities from their work on climate justice.

This chapter will focus specifically on how racialised communities have been systematically excluded from the mainstream environmental movement and how that has been detrimental to both sides.

The scope of this chapter is limited but it is important to acknowledge that people from racialised communities live at the intersection of multiple systems of oppression and therefore face multiple obstacles in the environmental movement. For the purpose of this chapter, racial identity is the main factor analysed, but it is important to keep in mind that oppression because of gender identity, disability, sexual orientation, migration status, age, religion, etc, also play a role.

A paradox is that, even if they were not included in mainstream environmentalism, racialised communities have always played a key role in protecting and defending the environment. Comprising less than 5% of the world’s population, indigenous people protect and care for 80% of global biodiversity. The people leading the fight against air pollution in the UK are Black, Asian and ethnic minorities (BAME) living in areas that are highly polluted because nobody else wanted dirty industry in their backyard. They are unfortunately only centered when this pollution kills.

There is a lot of evidence showing how racialised communities are impacted by climate change and pollution, within Europe. It is important to remember that climate change exacerbates existing social and economic inequalities. Just like racialised communities are left behind when it comes to education, housing, public transport, etc. They are not on the priority list when it comes to ensuring a clean-living environment for all. Moreover, social and racial discrimination and the assumption that communities would be less likely to mobilize and resist polluting projects may have been factors in governments and industries’ decisions.

Racialised communities have always been and will always be part of the environmental justice movement. They are just not recognised as such by mainstream organisations. Like Alast Mojtahed Najafi beautifully said, ‘when it’s white, it’s right’. And it is time that this changes.

A historical explanation to current problems

Many mainstream environmental organisations find their origins in the conservation movement that is committed to restoring something to a natural state and maintaining equilibrium. It stems from the idea that humans are inherently ‘bad’ for nature. This movement is rooted in white supremacy. The Sierra Club, for instance, was founded by John Muir, a famous ‘naturalist’ who was an early advocate for the preservation of wilderness in the USA. Considered the creator of the National Parks systems, Muir was also a white supremacist. His defense of pristine nature meant driving out indigenous populations who lived on the land. Other leaders in the organisation advocated for white supremacy and eugenist ideologies. These people helped create an environmental movement that excludes racialised communities, with the consequences of this framing still visible today.

It took the murder of George Floyd and the subsequent uprising for the Sierra Club to reckon with its racist history and distance itself from it. Although acknowledgement is a good first step (and it seems that the organisation has diversified its executive team and board and is vocal about diversity on social media), this is only a first step towards an intersectional movement that stands in solidarity with social justice struggles and fully incorporates racial justice in its campaigning.

The Sierra Club is not the only organisation that needs to reckon with its past. Many environmental organisations stem from movements and ideologies that are rooted in white supremacy. Why does this matter? It matters because if you do not process it, history repeats itself.

And that is what has been happening in the Global North. The argument that overpopulation is the main driver of environmental degradation and climate change (when we know that the world’s richest 10% were responsible for over half of cumulative carbon emissions between 1990 and 2015) has become more and more popular among celebrity environmentalists with a lot of media power. Jane Goodall and David Attenborough are among those who argue that the amount of humans on the planet is the main cause of all
ills. Jane Goodall has recently distanced herself from the argument in the media, but she supports an organisation whose patrons speak about overpopulation concealing the truth:

the poorest half of the global population, mostly racialised communities and indigenous peoples, are responsible for only around 10% of global emissions yet live overwhelmingly in the countries most vulnerable to climate change. Such arguments coming from people who have platforms to reach millions are particularly dangerous. High profile environmentalists have a responsibility to do their due diligence and be clear about their positions given the influence they exert in the movement. Other environmental groups are ‘leading’ in topics such as ‘climate security’ trying to attract the interest (and budget) of the military by bringing up migration influx and climate-related conflicts as threats to Europe’s future. The propaganda of ecofascist ideas also led to the worst in 2019 when a mass shooter killed 22 people, most of them members of the Latinx community, in El Paso, Texas. In his manifesto, the shooter leaned on ecofascist arguments and rhetoric, recalling the ideology of the founders of mainstream environmentalism. This dangerous and alienating rhetoric combined with recent scandals and allegations surrounding prominent organisations leads to one thing: marginalised communities in general and racialised people in particular do not trust the mainstream environmental movement. Ecofascist’s arguments could easily be debunked because they are simply wrong. Unfortunately, many of the leading environmental organisations in Europe shy away from openly debunking ecofascist rhetoric.

It is the responsibility of the environmental movement in Europe to acknowledge where it comes from, the mistakes it has made in the past, to refute any ecofascist argument publicly and loudly (silence is not enough) and to make sure to reach out to allies in other movements.

Communication matters

A fundamental mistake that environmentalists make is that the analysis and popular narratives used are often exclusionary, alienating or even hurtful to racialised communities. It is undeniable that the most popular image linked to climate change in the collective mind is the polar bear. Images of skinny, desperate polar bears have been used repeatedly to move people to open their eyes to the devastating consequences of climate change and act on it. A similar example can be found in the campaigns against deforestation caused by palm oil plantations in Southeast Asia. The campaign mainstream narrative is dominated by the orangutan and how deforestation threatens their habitat. This is obviously true, in the same way that polar bears are affected by climate change, but are these our priorities? Arctic Saamis are on the front lines of climate change in the Global North, and other indigenous populations are losing their lands in the Global South because of palm oil production. Yet, they are overlooked in this discourse and its images.

Whether it is intentional or not, these kinds of narratives send a message: animals matter more than indigenous and racialised communities around the world.

System change, not climate change

Despite the common use of the slogan, part of the reason why the mainstream environmental movement falls victim to damaging arguments and narratives is a lack of political analysis and understanding of power dynamics. We see it with the success of ‘technofixes’ and green capitalism.

This lack of systemic analysis leads to organisations running corporate partnerships that contribute to the greenwashing efforts of companies which are keen on showing an image of ‘climate champion’ while not fundamentally changing anything about their polluting activities. More often than not, these partnerships focus on the environment and completely ignore the human rights implications. For instance, in 2011, WWF Sweden entered in a partnership with fast fashion giant H&M. According to WWF, the partnership’s goal focuses on raising awareness and improving the company’s responsible water use, climate action, raw material consumption and biodiversity. By publicly working with H&M, WWF Sweden is contributing to the image of H&M as a conscious company people should buy from. This completely ignores the exploitation of workers the company is accused of. At the very least, WWF should make its endorsement of H&M conditional to a commitment to improving working conditions just like it is conditional to a commitment to sustainability.
Despite H&M’s known poor treatment of workers and the ongoing public campaigning against human rights violations in the fast fashion industry, the partnership seems to be going strong as WWF and H&M have recently collaborated on a children’s collection made of organic cotton. This collection also served as a fundraising campaign for WWF where H&M customers were encouraged to donate to the organisation.

More broadly, funding is one of the reasons why most environmental organisations use apolitical narratives and strategies. NGOs in Brussels and elsewhere are dependent on grants by public institutions and governments, private foundations (often spin-offs of big business or created by wealthy families) and donations. A truly political environmental movement would not be able to survive under this ‘business model’ as it would name and combat power dynamics and the current capitalist system and that would antagonise most funding sources.

As Brazilian activist Chico Mendes puts it, ‘Ecology without class struggle is just gardening’. The environmental movement lacks an intersectional understanding of the climate breakdown that takes into account dynamics of power and privilege to be truly meaningful.

Colonial capitalism is the root cause of the climate breakdown we have been facing. This system is tied to oppression and a dominance of capitalist heteronormative ableist patriarchy rooted in white supremacy. We can never dissociate them. We need to overhaul our entire economic and social system to put an end to climate breakdown and to build a society where everyone has a voice and equity is at the heart of decisions.

White-led environmental organisations need to understand that the only way we will reach the goals they have set is by shifting the power dynamics. And that will not happen with corporate partnerships, focusing on individual behavior changes or accepting solutions coming from people responsible for this crisis in the first place. We should never forget that access and power are not the same things. Environmental organisations in Brussels might have access to EU decision makers, but do they have the power to influence them? People power and intersectional organising together with a political systemic analysis of the problem and solutions - understanding that all our struggles are linked and have the same root cause - are the only ways that the environmental justice movement can make our voices heard. This is how we can become stronger than the deep pockets of the industries responsible for and benefiting from climate change and get decision makers to create actual change, in the EU and everywhere else.

Nothing about us without us

Representation is definitely a problem in the environmental movement in Europe. It has not been as well documented as in the US (partly because of the impossibility of gathering racial statistics in many European countries), but it does not take an academic researcher to look around a room (or zoom meeting) of green organisations in Brussels and notice that non-white faces are few and far between.

While representation is very important, especially for organisations who claim to speak for the voices of the European people (10% of which are racialised people), and initiatives that push for more diversity within environmental organisations are welcome, all representation is not created equal. It is important to not just look at the composition of organisations but also, to keep in mind power dynamics within organisations and to analyse the representation of people from marginalised communities in positions of power to avoid tokenism. That means looking at management teams, director positions, board members and other leadership positions.

Another aspect to consider is the working environments racialised people step into when they are given the opportunity to work for environmental NGOs. Environmental organisations do not exist in a vacuum and they do reproduce the systems of oppression that we experience in society. The trauma racialised people can experience in overwhelmingly white environmental (and other) organisations and the toxic culture that can develop is not to be taken lightly. If environmental organisations are serious about representation, they need to ensure a healthy working environment for racialised people.

Moreover, it is important to recognise that, even if we achieve satisfactory representation of racialised communities in European environmental organisations, that alone will not solve the problem. There is a difference between individual situations and structural racism. While the former can be helped with representation and inclusive policies, the latter points to the structures that create and maintain vulnerability and harms and is much harder to tackle.
There are groups who apply a systemic political analysis and demand justice on all front. These include:

- **Front de Mères** is a women-led parent’s union fighting the discrimination, oppression and all forms of violence and injustice, including pollution, that their children face every day in the impoverished and racialised “quartiers populaires”.

- **The Wretched of the Earth** is led by Indigenous, Black, Brown and diaspora groups and individuals demanding climate justice and acting in solidarity with communities in the UK and in the Global South.

- **The UK Student Climate Strike Network** has made the struggle against all forms of oppression a cornerstone of their organising.

- **The Union of Justice** initiative is a European, independent, people of colour (POC) led organisation dedicated to racial justice and climate justice. Their main goal is to ensure that climate policy does not worsen injustice and that the voice and concerns of POC are heard and embraced.

- **The Collectif des ouvriers(res) agricoles empoisonnés(es) par les pesticides** is a collective of farm workers fighting to get recognition for the poisoning they suffered because of chlordecone, a harmful chemical, in France’s overseas territories.

All these groups understand that capitalism and colonialism are the root causes of the situation we are in today and that there is no climate justice without social justice (and that includes racial justice, migrants’ justice, gender justice, disability justice etc). Our struggle needs to encompass all forms of oppression and include all liberation movements.

It is also important to acknowledge that the recent steps forward taken by decision-makers on climate did not come about because of civil society. Although environmental organisations at the EU level have paved the way with advocacy and are trying to ensure the adoption of climate policies, it is undeniable that last year’s climate reckoning and subsequent climate action from the EU (as apolitical and ineffective as it is) came about because of social movements and young people taking matters into their own hands.

Groups and movements that truly believe and practice intersectional organising are happening all over Europe and the world. If the mainstream environmental movement continues with ‘business as usual’ it will simply become obsolete, be considered irrelevant and be pushed aside.

As Audre Lorde said ‘there is no such thing as a single-issue struggle because we do not live single-issue lives’. It is crucial for the environmental movement to remember that and realise, that there is no environmental justice without social justice.

**Now what?**

It is difficult to make recommendations that are concrete enough to be implemented but significant enough that they are not ‘quick fixes’. Equinox has written an extensive paper on EU climate policy and how it needs to do better to ensure true racial justice. I am not here to dispense a checklist of ‘5 small acts to overcome systemic racism’ because that tends to be the wish and the problem is too complex for easy fixes. Instead, I will try to dispense some reflections.

It is more than timely for white-led environmental organisations in Brussels to take a long hard look in the mirror. They need to put their pride and defensiveness aside and listen to what the few racialised people in the European climate field have been saying for so long.

The first step is education. White-led organisations need to learn about the links between climate change and colonialism, about the dangers that upholding capitalism lead to and what solutions and alternatives indigenous and other racialised communities have been discussing and practicing. White-led organisations need to make sure their organisations represent all Europeans and not just as tokens but in positions of power where they can make decisions. But that is only the first step (and the easiest).

There needs to be a deep reflection of what role mainstream organisations play in the climate debate, and whether it is truly serving the people. What are you trying to achieve, what is your theory of change, and how does it relate to the demands of affected communities in Europe and elsewhere? All those questions need to be explored in a deep and meaningful way and the conclusions need to drive change.

A key point to keep in mind is to always center and follow the lead of the most marginalised communities. Our liberations are tied together and by centering the liberation of the most
marginalised people we ensure liberation for all. At the global level, that means following the lead of indigenous communities and environmental and human rights defenders in the Global South. The same goes for Europe. This takes relationship building and trust between movements and people. It is not ‘sexy’, it is not easily funded, but it is indispensable to a truly intersectional environmental justice movement.

Last but not least, just do it. There are so many discussions, debates, and rhetoric around ‘intersectionality’ and climate justice, but very little action. Perfectionism and decision paralysis are real obstacles to progress that we all need to overcome. Mistakes will undoubtedly be made, but mistakes (made in good faith) are how we move forward.
33 "What is palm oil and why is it thought to be bad?", BBC, Original publication November 11, 2018 (accessed June 15, 2021)
34 Equinox, "Towards Climate Justice Rethinking the European Green Deal from a racial justice perspective", 24
36 WWF, Corporate Partnership Report: Fiscal Year 2019 (Gland: WWF, 2019)
37 For a definition of greenwashing, see: "greenwashing", Cambridge Dictionary (accessed June 15, 2021)
38 "H&M Group and WWF extend partnership", H&M Group, Original publication March 26, 2021
39 "WWF AND H&M GROUP - Partnering on water, climate and biodiversity", WWF (accessed June 15, 2021)
40 "New research findings accuse H&M of failing to ensure living wages for its supply chain workers: incl. co response", Business and Human Rights Resource Center, Original publication October 2, 2018 (accessed June 15, 2021)
41 "Campaigns", Clean Clothes Campaign (accessed June 15, 2021)
43 Politico, "Does the Brussels bubble have a diversity problem?", Politico, Original publication December 19, 2017 (accessed June 15, 2021)
44 "Green politics has a whiteness problem", #GreenBrusselsSoWhite
47 Nazia Parveen, "Amnesty International has culture of white privilege, report finds"
49 Equinox, Toward Racial Justice: How the EU can create lasting change for racialised people
50 "Premier syndicat de parents", Front de Mères (accessed June 15, 2021)
51 "The Wretched of the Earth", Facebook (accessed June 15, 2021)
52 "Accountability Agreement", UK Student Climate Network (accessed June 15, 2021)
53 "Nothing About Us Without Us!", Union of Justice (accessed June 15, 2021)
54 "Collectif des ouvriers (es) agricoles empoisonnés (es) par les pesticides", Madiin’art Critiques culturelles de Martinique, Original publication November 6, 2020 (accessed June 15, 2021)
56 Equinox, Towards climate justice: Rethinking the European Green Deal from a racial justice perspective
57 I highly recommend reading the work of Malcolm Ferdinand, especially his book ‘Une écologie décoloniale’ (2019) to be translated in English.
“WE PUSH FOR A DECOLONIAL PERSPECTIVE ON CLIMATE JUSTICE”

Interview with Nene and Tatu from the Black Earth Kollektiv
By Naïs Ohayon-Louisor
The lack of diversity in Germany’s environmental groups inspired intersectional activists to show that environmental issues are interconnected with other social issues such as racism, sexism or inequalities. Black Earth Kollektiv is an intersectional environmental and climate justice collective founded in Berlin, Germany. On April 22nd, 2021, Naïs Ohayon-Louisor, Treasurer at Youth and Environment Europe and MSc student in Environmental Policy and Regulation at the London School of Economics, interviewed Nene Opoku and Tatu Hey, members of the Black Earth Kollektiv.

It is really nice to finally meet you both, I have been looking forward to this conversation. Tell me a little bit about yourselves.

Tatu: Hello, my name is Tatu. I am Kenyan-German, I grew up half here (near Hamburg) and half in Nairobi. I now live in Berlin. I have been part of the Black Earth Kollektiv for a bit over a year now. I studied African studies and went on to get my master’s degree in International Relations with a critical focus on international development and environmental politics. My job is not climate related, therefore I am very happy to have Black Earth in my life which allows me to do the things I am passionate about.

Nene: Hi, I am Nene. I am also in Berlin, and always have been. My mother is German and my father is from Ghana. I studied Politics and History in my bachelor degree and now I do Interdisciplinary Antisemitism research, looking at all forms of discrimination from a historical perspective. I have been at Black Earth since the beginning, around 2017.

You are both part of the Black Earth Kollektiv, can you explain what that organization does?

Tatu: Our collective is called Black Earth Climate Justice Kollektiv and we are a Black, Brown, Indigenous and People of Colour (BiPoC) collective. We push for a decolonial perspective on climate justice, especially in Germany, as we are based in Berlin. We do workshops for different kinds of groups (e.g., young people on their exchange year, or environmental groups). It is important to note that environmental groups here in Germany are predominantly white. We try to show how environmental issues are interconnected with other issues such as racism or sexism. We focus on building awareness but also building networks with other groups who deal with similar issues. We also try to be a voice in Europe to represent the people who have been fighting for climate justice in the Global South for a long time.

Nene: There are not many groups like us in Germany, if any. Therefore, even more so in the context of Covid-19, it is necessary to increase visibility of these topics because people tend to not link racism, colonialism, and sexism to the climate crisis.
**Why is there a need for such a collective? Why is its work important?**

**Nene:** It’s very important to bring visibility to decolonial perspectives and motivate the anti-racist movements. In Germany, within the climate movement, there is mostly visibility for white people protesting (e.g. Fridays For Future) at the moment. BIPOC don’t necessarily identify with them. Not only because they don’t always look like them, but also because the topics that are brought up mostly focus on the concerns of certain dominant groups of people.

**Tatu:** We value intersectionality. It is very important to us to see how social issues relate to one another.

**Why did you get engaged in climate activism?**

**Tatu:** It’s a difficult question for me, because the answer might sound cheesy (laughs). As a child I spent a lot of time outdoors. I then started to work in an office in Berlin and started feeling very disconnected from nature. I was very dissatisfied with the way human beings treat nature, and that’s what made me want to get engaged. I also felt like the topics that were discussed in environmental groups weren’t targeted towards me, so I was very happy to find Black Earth.

**Nene:** Black Earth was my first time getting engaged with climate activism, I didn’t feel like there was a perfect match with any other environmental groups. Before Black Earth I was involved in anti-racist, anti-sexist, and Black feminist groups. We live in a complex society and there are so many fights I want to fight. Taking an intersectional approach makes more sense to me to fight for climate justice because it encompasses all the issues I care about. When it comes to fighting against racism or sexism, I also feel much more empowered and comfortable doing it through a climate justice lens because most people can relate to climate and environmental issues. I can then bring up sexism and racism in that picture and relate my personal struggle to the bigger social context.

**What do you wish to accomplish in the climate movement?**

**Nene:** As long as it is a white dominated movement, we can try to bring in a decolonial perspective and intersectional approaches. When organizing events or actions we look at how people are affected by different power structures. We acknowledge that racialized and marginalized bodies will be treated differently than white bodies by state institutions.

**Tatu:** Create a space for the people of the African diaspora and BIPOC within the climate movement. David Lammy (UK Member of Parliament) pointed out that more and more of the oppressed voices are now being heard. He called out the media for cutting Vanessa Nakate (Ugandan climate justice activist) out of the picture at the World Economic Forum in Davos last year and said something very powerful: “erasing this person off of the photo is erasing a whole continent.” I am happy that more voices are now being heard.

**Do you think that the fact that you are young Women of Colour makes your experiences in the climate movement different from that of white people or men? If so, how?**

**Nene:** It’s important to note that Tatu and I speak from a privileged position as light-skinned women with academic backgrounds. We can’t ignore colourism, which is the prejudice or discrimination (even within an ethnic group) favouring people with lighter skin over those with darker skin. However, we can say that we very often tend to be more shy or unsure when it comes to speaking up or taking action in comparison to a white cis man for example.

**Tatu:** Nene is right to acknowledge our privileges as light-skinned Black women in Germany. Nevertheless, we do encounter racism and sexism and we can channel these experiences to understand the different levels to which people are affected by complex consequences of the climate crisis.

**In your opinion, why and how are so many young women playing a prominent role in the youth climate movement?**

**Tatu:** In comparison to how things were a few years back when I was in my teens, things have evolved. In my household we never spoke about feminism for example. I think today, with social media as an educational tool, a lot of women are more aware and have heard terms such as “patriarchal structure” for example. I think as we speak more of feminism and access to different terms and theories is being democratized, young women feel more empowered to speak up and fight for what they believe in, as they now see it as a possibility.

**Nene:** We often hear of how the climate movement attracts more women than most other social movements. I think it is because nature is more associated with the feminine, we speak of “Mother Nature”, or “Mother Earth” for example, and this influences activism.
How are gender topics discussed inside the movement? Do you think it is enough?

**Nene:** It is more discussed now than in the past, but it is still not enough. For example, some environmental groups in Germany have rules to always showcase women when it comes to visibility but, in my opinion, this visibility and representation is lacking when it comes to their activities and what they choose to focus on.

**Tatu:** I also think that in some more established organizations the gender perspective is very binary. Especially when they talk about women of the Global South, who they showcase as “vulnerable helpless women who need our help”. Even if there is a gender narrative, it might be obsolete because it is binary and sometimes even racist.

Do you think there is such a thing as feminist environmental policies?

**Tatu:** I do not think that feminist environmental policies currently exist, but I think it is a possibility. Today, a lot of policymakers have white hetero cis males in mind when designing policies. However, policy do not affect all people the same way. A feminist environmental policy would understand this, and the people designing it would ask themselves “how does this policy affect the people and the environment here? How does it affect their lives? How does it affect different categories of people? etc”. I think the way policies are made in Brussels is very technocratic, and so far away from the experiences that people actually live. Everyone’s voices must be heard a lot more so that policies can actually be for the people.

**Nene:** The transformation on the ecological level has to go hand in hand with changes in the gender structure of society in terms of job allocation. For example, in Germany, on the one hand, the car industry, which is male-dominated, is evolving and a lot of workers find themselves unemployed. On the other hand, the care industry, which consists of mostly women, is overwhelmed. Hence, I think the ecological transition needs to consider these kinds of issues to make it as fair as possible. We need to design solutions to advance equality alongside being more respectful of the environment.

What do you think leaders of the environmental movement should do to make everyone feel as though they belong, particularly with respect to people who have been historically excluded?

**Nene:** The best thing to do would be to focus on anti-racist and feminist fights. If movements such as Fridays For Future really focused on anti-racist and feminist fights, it would bring these issues and intersectionality to the front. This would scare the leaders of the environmental movements as well as policymakers who would then have to react.

**Tatu:** Show how the environment intersects with other social issues, such as inequalities, sexism, racism etc. A UK survey showed that BIPOC are primarily affected by high pollution problems. We need to acknowledge that underprivileged people do not necessarily have the time to sit in assemblies and take time off to fight for climate. Environmental leaders have to take a lot of social factors into consideration. They also have to fight against precarity, so that more people can get engaged in the climate fight.

What are you optimistic about today?

**Tatu:** I was very happy to see David Lammy talk about the intersections of racism and the environment, considering how influential he is in the UK. I am also optimistic that Greta Thunberg is now connecting the climate crisis and the Covid-19 crisis, shaming the EU for its nationalism and unequal vaccine distribution. I am also optimistic when I see people like us, young Women of Colour, having the conversation we just had.

**Nene:** What I am optimistic about is that I see a general growing frustration against what the white-dominated media shows of the environmental movement. The white dominated environmental movement is starting to look at other sources to find answers and reflect more on the social aspects of the environmental crisis.

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1. [blackearthkollektiv.org](https://blackearthkollektiv.org) (accessed June 10, 2021)
AN INCLUSIVE AND GENDER-JUST WELL-BEING ECONOMY
A FEMINIST WELL-BEING ECONOMY FOR ALL

By Katy Wiese
A FEMINIST WELL-BEING ECONOMY FOR ALL

Introduction

A well-being economy is about equality and creating a good life for people and nature, rooted in the principles of care, cooperation and solidarity, the promotion of women’s autonomy and leadership, valuing of local knowledge, and freedom from gender-based violence. Our current economic system clearly fails to achieve these goals. The coronavirus pandemic was a shock to many Europeans, with devastating impacts on people’s livelihoods, wellbeing and the environment with disproportionate effects on women, as shown in Chapter 6 of this report. But even before the pandemic, the system started to crack. We currently live in an era of mass extinction and rapid climate change acceleration with 2020 identified as the hottest year on record. At the same time, Europe consumes more and more. The economy made up of the 27 EU member states (MS) and the UK is significantly overshooting planetary boundaries while not meeting its own social aims such as healthcare needs or the gender gap in employment. Overconsumption in the European Union (EU) contributes to environmental degradation within, but also beyond, the region causing the loss of livelihoods of many people in less-privileged countries as explored in chapters 8 and 9 of this report.

One of the core problems is that our economies are organised around the constant expansion of extraction, production, and consumption measured as Gross Domestic Product (GDP). Boosting economic growth has been the main policy objective in the past 70 years and is still viewed as the only means to ensuring economic and political stability by most European decision-makers. GDP growth at all costs gets us into a situation where work that is most valuable for society such as care work, environmental quality, art, culture and education outside the market, is being excluded from calculations of GDP, rendering it invisible and undervalued in decision-making processes. These jobs are mostly done by
the most vulnerable in our societies, such as migrant workers, women, and minorities. Moreover, the reliance on the healing powers of the so-called free market, that is set to be more efficient in managing public goods, fails to regard the interconnectedness of the economy, our society, and the environment. This misguided belief also persists because the European economy is structurally dependent upon continued GDP growth. For example, looking at employment and work, our economic system can best be seen as an endless treadmill: the growth-driven market system continues to work as long as we become more productive to produce more and to expand our economies to avoid unemployment. 3

While there is increasing consensus that we need to decarbonize our economies (exemplified by agreements of green deal packages such as the European Green Deal), transforming towards this conception of a “green economy” will not be enough to drastically reduce emissions, nor to enhance gender and social justice as it strongly relies on technological innovation, green investments and green consumerism, thus failing to include intersectional social justice. It is further still organised around the constant expansion of extraction, production, and consumption that we measure as GDP. Growth itself is not necessarily good or bad. It is rather the focus of growthism for its own sake and for the sake of capital accumulation that is problematic. 4

How does the economy relate to gender issues?

As highlighted in the introduction, our current economic system does not fully recognise gender matters such as unpaid care and domestic work as well as ecological processes and leaves them outside of the market. This leads to an unequal distribution of wealth, power, and wellbeing. The main root causes can be identified as past and perpetuated injustices and colonialism, ever-increasing concentration of economic and political power, a fixation and structural dependency on GDP growth and a system largely based on patriarchal values and gender injustices.

In fact, classical economic thought is based on the homo economicus (the economic man), a rational and utility maximising individual, seeking to exchange services and goods on the market for his own benefit. Rational self-interest is viewed as the determining force of human behaviour. 7 It further represents a white cis male and characterises other non-male actors as, inter alia, irrational and emotional and primarily acting in the “private sphere”. 8 This economic ideology/paradigm assumes that the majority of households, as economic ‘units of production’ reflect the cis-heterosexual nuclear family and thus reinforces the traditional distribution of roles of male breadwinner and female caregiver. This focus on the private domain as a “household unit” further assumes that gender equality is inherent in households, which is reflected in statistical data such as on income and distribution. Nature and non-human animals are viewed as subordinate to humanity. 9 Philosophically, we see a certain dualism between nature and humans. We describe the living world as natural resources, raw materials and ecosystem services because we believe that nature or what happens to nature is external to what happens to humanity. 10

The growth-driven market (under this ideology) treats both nature and care work as infinitely stretchable resources, steadily available for production. At the same time, the increasing privatisation (and liberalisation e.g. through the Bolkestein Directive 11) of public services and steady cuts of public spending due to finance gaps and austerity measures, endangers the quality of care work and has been a driver for further inequalities. For instance, women’s unpaid labour is often assumed to fill the gaps when state provisions of public services are lacking or poor, resulting in many women facing time poverty as well as physical and emotional exhaustion.

This results in, first of all, in the violation of women’s rights. While the rights of women in Europe have significantly improved, there are still many examples of violation of those e.g., equal participation in labour markets and access to decision-making and managerial positions (“glass ceiling” effect), equal payment, and gender-based violence. Patriarchy also perpetuates a binary gender system in which two genders are defined in opposition to each other which leaves no room for gender fluidity. 12

Secondly, the current economic system does not recognize care, especially unpaid and domestic, and ecological processes that are essential for sustaining the “formal” economy. Our economies are characterised by a separation between a productive sphere that includes all market goods and services and a reproductive sphere that includes largely non-monetised, unpaid and unrecognised caring activities. 13 Historically, women have mostly borne the
responsibility for the reproductive or maintenance economy. While formal equality between women and men has been won in many countries and legal spheres, the impacts of this artificially created divide into productive and reproductive economies are still apparent today. Women have been encouraged to join the ‘productive’ labour force, but they remain responsible for the bulk of care activities. More than three-quarters of all unpaid domestic and care work is done by women, and women spend more time doing unpaid care work than men in all regions of the world. This is to say that the category ‘women’ is not homogenous, and not all women have been equally encouraged to join the productive labour force.

Current macroeconomic policies, including monetary, fiscal and tax policy, in the EU and MS’s are designed to benefit the growth model-based economy and thus perpetuating the inequalities described above. Furthermore, EU policy responses (i.e., Europe 2020 strategy (2010), Biodiversity Strategy to 2020 (2011), and Roadmap to a Resource Efficient Europe (2011)) towards environmental challenges and decarbonisation efforts have followed “traditional” green growth strategies. It means that, in the context of the financial crisis (2007 to 2009), we saw policies focusing on overcoming the economic crisis through green stimulus and innovation that reduce greenhouse gas emissions while prioritising economic growth. Green growth as a solution to control environmental deterioration. The European Green Deal (EGD), introduced in December 2019, follows that path.

Will the European Green Deal deliver a systemic transformation towards a well-being economy?

First of all, the EGD is totally gender-blind. Secondly, the European Commission presents its Green Deal as a “new growth strategy” that aims to “transform the EU into a fair and prosperous society, with a modern, resource-efficient, and competitive economy where there are no net emissions of greenhouse gases in 2050 and where economic growth is decoupled from resource use.” It prioritises environmental goals, but policies are focused on transforming towards a growth-oriented, competitive, greened, and circular economy. It does not break with the “traditional green growth” approach as if the ecological crisis could be solved by implementing green technologies and driving more eco-friendly consumption and production patterns without overall reduction of throughput or significant changes in middle-class standards of living. For example, the too modest goal of net reduction of greenhouse gas emissions of 55% by 2030 is meant to be achieved with the help of green technologies and digitalisation, targeted towards green growth while there is no mention of care as an essential part of decarbonising the economy. It still relies on the promise
that environmental pressures can be decoupled from economic growth, which has been debunked. Empirical evidence shows that decoupling is not achievable to the scale and at the speed required to achieve Paris agreements.19 These aspects conclude that the EGD as of now cannot be framed as transformative or revolutionary as typically presented. Its approach neither challenges present power structures nor old ways of thinking as it rests on the western enlightenment ideology of progress and living and a logic of capitalism based on patriarchal values.20 “Greening” capitalism ignores the fact that it is exactly those power structures that have led to the ecological and social crisis, as well as the deeply intertwined nature of environmental and social aspects.21 It further fails to include care as an essential part of the green transition (see Chapter 7 of this report) as it continues to rely on unpaid and underpaid care work. Technologisation is not critically assessed and not regarded as potentially contradicting with justice aspects. It further neglects cultures that have developed a different relationship to nature.

The European Green Deal is further embedded in the wider EU Economic Governance Framework, which is based on the old paradigm of continued growth. EU economic governance can be considered as “a maze of rules impacting their fiscal and socio-economic policies” which are deemed to be gender-neutral, while it has in fact systematically reinforced inequalities that have been described previously. The EU fiscal framework with its simplistic and arbitrary rules (i.e. to limit public deficits to under 3% of GDP and debt stock to 60% of GDP) has focused on the reduction of public spending which is urgently needed for the ecological transformation and to build resilient and gender-just societies.22 For example, the Stability and Growth Pact (SGP), including its so-called “Six-Pack” and “Two-Pack” regulations introduced in 2011 and 2013, paved the way for axing health care budgets and rising inequality both inside EU countries and between EU countries. Enforced austerity programmes have led to cuts in social spending that would have been necessary to maintain and build a public health infrastructure fit to deal with the outbreak of Covid-19 and enhance gender equality.23 Constraints on fiscal policy imposed by the SGP have directly limited states’ ability to redistribute wealth through welfare and public services.24 Country specific recommendations of numerous EU member states and the so-called Macroeconomic Imbalance Procedure (MIP), part of the above-mentioned Six-Pack regulation, have focused on suppression of wage growth; increasing pension age; privatising state-owned enterprises and healthcare; promoting longer working hours; demanding a reduction in job security; and cutting funds to social services.25 These austerity measures had a disproportionate impact on women and other vulnerable groups. Cutting back on public services often falls back on women, as they are expected to take on the bulk of the care work.26

A feminist economic system for the well-being of all

Our understanding of a feminist vision of a well-being economy aims at a systemic transformation of our economic system away from the fixation on GDP growth and material extraction, towards the goal of social and ecological justice and well-being. It offers a holistic approach, linking economics to wellbeing and considers non-monetised and undervalued activities as contributing to the economy. Hence, such an economic system takes a new approach to the concept of labour, integrating different forms of work that have not been recognised before. A well-being economy is centred around care and based on a macro-economic framework that embraces fundamental values such as solidarity, equality, including equality of opportunities, non-discrimination, respect of differences and diversity with particular attention to intersectionality. Nature is regarded as an essential actor in economic processes and thus breaks the dualist perspective of nature subordinated to humanity. A first step towards a wellbeing economy is being pursued by New Zealand which designed its entire budget based on well-being priorities such as addressing child poverty, mental health, a green transition, and domestic violence, wherein its ministries are mandated to design policies to improve wellbeing.27

Building a feminist well-being economy requires a fundamental shift in mindsets, recognition of past and present injustices and power structures, good governance, and strong political will and commitment. Europe has an essential role to play in the transformation. Fundamental values of the EU such as “the promotion of peace, its values and the wellbeing of its peoples” are closely aligned with the vision of a wellbeing economy.28 There are entry points for more transformative change if we start to broaden our understanding of transition, balancing ecological and social justice.
On the one hand, the EGD might follow the tradition of green growth, but there are elements up for interpretation that could bring about more transformative change. For example, while the EGD does not explicitly mention post-growth ambitions, it highlights the need to restore and protect the commons from industrial exploitation. The extraction of materials is phrased as "a major global risk" which hints to the acknowledgement that extractivism is a major cause of environmental destruction. The "do no harm" principle can be interpreted as the recognition for the need to restore and protect ecosystems and expand the dualist understanding of nature. The commitment for an inclusive and just transition by emphasising strong involvement of citizens and other stakeholders at least taps into breaking old power structures.

On the other hand, the upcoming EU review of the EU economic governance framework provides a unique opportunity to replace the outdated and harmful legislations by a timely and constructive Sustainability and Wellbeing Pact. A macro-economic framework that is more resilient, just, and explicitly prioritises human (and non-human) well-being over economic growth could bring us closer to a feminist well-being economy.

Recommendations

To leverage the transformative potential and build a feminist wellbeing economy, the European Union and Member States policies must aim to:

- Reframe core policy goals towards well-being based on an understanding of the centrality of the care economy and lessons learned from the Covid-19 crisis and apply this to key European frameworks such as the European Green Deal, EU economic governance, the 8th Environmental Action Programme (BEAP) etc.
- Replace GDP as an overall indicator for prosperity and introduce better methods of measuring the wellbeing, human rights, tackling inequalities based on gender and other social and economic discrimination, and protection of the environment and climate.
- Recognise paid and unpaid care work as central components of both the economy and systems that sustain life and foster other forms of production, exchange and consumption outside the context of the market by e.g., acknowledging the central value of care and prioritising the care economy in legislation; investment into care infrastructure and public services as well as inclusive and quality access to caring and caring services.
- Invest in more comprehensive research and data gathering tools to track and assess progress and macroeconomic policy impacts that use robust intersectional analysis to better track and address gender inequalities, ensuring women at the margins are neither made invisible nor left behind.
- Decouple employment/work and social security systems from economic growth by offering universal access to gender-responsive public services, such as healthcare, education, housing, and water through public or communal provision and by providing security to all through universal social protection, taking into account the ecological impact of welfare policies and designing these in a way that takes account of socio-ecological needs.
- Reform the fiscal framework to put environmental, social and gender justice goals at the heart of EU economic governance. Design and implement new flexibility rules and guidelines within a Sustainability and Wellbeing Pact that replaces the SGP that allows the investment in the green transition as well as care economy (and public services) to lay the foundation for a well-being economy that translates into the reduction of inequalities and gender transformation.

4 Jason Hickel, Less is more: How degrowth will save the world (Windmill, 2020).
5 Europe’s present-day prosperity is at least partially shaped by the deep historical injustices and inequalities on which the economic system is built. Current distributions of wealth and power can be traced back to a history of classism, slave trading, colonialism and exploitative terms of trade in the
neo-colonial era. Barbara Sennholz-Weinhardt et al., *Towards a wellbeing economy that serves people and nature* (Oxfam Germany e. V. and European Environmental Bureau, 2021).

6 Patriarchy is a system of oppression built around male privilege and toxic masculinities that perpetuates sexist and hierarchical power relationships. It legitimises discrimination against and the exclusion of women and gender non-conforming people through harmful social norms, policies and institutions. It cannot be reduced to a sum of individual acts. Rather, it is a coherent system that affects many aspects of life for individuals and groups.


9 European Women's Lobby, ed., *Purple Pact. A feminist approach to the economy* (Lobby européen des femmes, 2019).

10 Rachel Nobel et al., *Another World is Possible: Advancing feminist economic alternatives to secure rights, justice and autonomy for women and a fair, green, gender equal world* (2020).


17 Ibid.

18 Ibid.

19 Timothée Parrique et al., *Decoupling Debunked. Evidence and arguments against green growth as a sole strategy for sustainability* (European Environmental Bureau, 2019).

20 Ossewaarde and Rosneatha Ossewaarde-Lowtoo, *The EU’s Green Deal: A Third Alternative to Green Growth and Degrowth?*


24 Ibid.

25 Ibid.

26 The price of austerity - The impact on women's rights and gender equality in Europe (Brussels: European Women's Lobby, 2012).

27 Rachel Nobel et al., *Another World is Possible: Advancing feminist economic alternatives to secure rights, justice and autonomy for women and a fair, green, gender equal world*.


32 For more information please see our publication Sennholz-Weinhardt et al., *Towards a wellbeing economy that serves people and nature*.
LEVERAGING THE GREEN TRANSITION TO OVERCOME THE LABOUR MARKET’S GENDER SEGREGATION.

By Celia García-Baños, Rabia Ferroukhi and Nadège Lharaig
“Another generation of women will have to wait for gender parity” said a March 2021 report by the World Economic Forum.¹ Yet, instead of promoting gender equality, the European Union’s (EU) Just Transition Mechanism, the Renovation Wave, and other strategies related to green jobs, are gender-blind and do not address intersectionality. This is a missed opportunity, rendered all the more problematic as the economic and social consequences of the Covid-19 crisis have exacerbated the existing gender inequalities.

Women are at higher risk of exposure to Covid-19 and overwork, as they are over-represented in most essential occupations (health and care sectors, food manufacturing and retail). In the EU labour market and in the household, all of the gender equality indicators have declined. Women are dropping out of the workforce, either because they worked in predominantly feminised industries (such as services and hospitality) that had to close, or because they needed to take care of their children and elders. Working from home combined with the closure of schools and care facilities has accentuated the care burden, and women have taken the bigger share of that work. A study for the European Parliament² suggests that women have been doing 65 hours of unpaid care work per week whilst men have been doing 50 hours per week.

But even before the health crisis, the EU labour market was characterised by staggering gender inequalities. Examining this through an intersectional perspective is particularly telling. The gender employment disparity is a gap of 12 points, with 79% of European men

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employed compared to 67.3% of European women. This widens drastically when we examine intersecting disparities, as data suggests only 16% of Roma women and 21% of women with disabilities are estimated to be employed. The labour market is also very segregated with women usually taking jobs in sectors that are characterised by lower pay, status, and value, with poorer career prospects, fewer options for upskilling, higher health and safety risks and informal working arrangements. Other indicators such as pay, pensions and lifetime earnings show similar trends: women are always disadvantaged on the labour market compared to men, with women at the intersections of several oppressions being even more at risk.

The reasons for these inequalities are well-known and mutually reinforcing. We count among them the burden of unpaid care responsibilities laying predominantly on women’s shoulders, gender norms and stereotypes in recruitment, promotion and retention policies of companies, biased education, and orientation as well as discrimination and violence against women in the workplace, (as outlined in chapters 2 and 5 of this report). Nancy Fraser demonstrated how these phenomena are all embedded in patriarchy, racism and capitalism, systems that systematically devalue women and minorities’ work and worth in society.

The EU has recognised the principle of gender equality in the labour market as early as its creation in 1957, as the Treaty of Rome enshrined the principle of equal pay for men and women. Since then, the EU has developed a broad set of legislative frameworks and policies to improve gender equality at work. These lay out the right to equal pay for equal work, equal opportunities in access to employment, training and occupational social security schemes as well as aiming to protect against discrimination, gender-based harassment and violence.

Despite this normative and legislative portfolio, progress towards gender equality is painfully slow. In this chapter we will explore how the green transition can be used proactively to create a totally inclusive labour market for men and women. We will do this by exploring two ways to eradicate gender segregation that we deem essential, while not being unique solutions. The first one is applying a gender-mainstreaming approach to the renewable energy sector and the second one is to consider care jobs as green jobs. We will also assess whether the European Green Deal could bring this transformative change and propose recommendations on how to move forward.

Unlocking the potential of the job creation in the renewable energy sector for women and minorities

As the global energy transition accelerates, the renewable energy sector aims to create an increasing number of jobs and improve livelihoods. Employment in this sector globally has already risen significantly - from 7.3 million jobs in 2012 to 11.5 million in 2019, of which 1.3 million were in the EU. By 2050, the figure is projected to nearly quadruple, to 42 million employees, 2.7 million of which would be in the EU. Despite the pandemic, this will be possible if the right short- and longer-term measures are put in place.

Renewable energy deployment creates jobs across all supply chain segments within a diverse set of occupations and skills, drawing on both technical and non-technical expertise. Countries may leverage their current domestic capacities to create viable supply chains whilst also adapting and extending their educational and training programs to ensure a skilled workforce for the future. The multidisciplinary nature of these opportunities makes it critical to tap into a wider pool of talent. This could provide greater inclusion and equality, especially for minorities and socially excluded groups, as well as for women who face bias and discrimination but can bring different skills and perspectives into the sector.

Even though women make up nearly half of the world’s population, they have been under-represented in the overall energy workforce. In the oil and gas industry, men vastly outnumber women, who account for barely 22% of the total. The renewable energy market outperforms the traditional energy sector in the inclusion of women. According to a global survey conducted by the International Renewable Energy Agency (IRENA), 32% of the people employed in this sector are women. The global figure is consistent with regional estimates for the EU as the literature suggests that in Europe in 2016, women represented on average 35% of the workforce in the renewable energy sector. However, some renewable energy technologies perform less well, such as the wind energy sector, where women account for only 21% of the total workforce. And in all renewable energy industries, the fact that women are still a minority among technical staff and in management positions deprives the energy transition of critical capacities.
A number of policies and measures are needed to advance gender equality in the renewable energy sector:

- **Mainstreaming gender**: Gender equality must be incorporated into all aspects of the renewable and the broader energy industry, including policymaking, program design, and project execution.

- **Challenging cultural and social norms**: Raising awareness of the multiple roles women can play in the energy transition and assisting them in becoming agents of change in their societies to reshape the gender role perceptions in any context. This is a fundamental issue, and it is critical as these social and cultural norms are fostering the behaviours that perpetuate inequalities.

- **Attracting and retaining female talent**: Enacting policies that promote work-life balance and fair access to professional development opportunities. In this sense, both governments and the private sector must work together by leading with initiatives that encourage females’ greater participation. For example, given the lower participation of women in the wind energy industry, Vestas, a wind manufacturer, has acknowledged these difficulties and has set long-term safety targets and ambitious goals for building a more inclusive and diverse workplace.

- **Training and skills development for women**: Women should be trained in technical and non-technical subjects as well as business and leadership skills. Governments, educational institutions, trade groups, and other stakeholders must adapt curricula and improve mentoring opportunities for women. Promoting women leaders to mentor young men could likewise benefit how men perceive the role of women in the industry.

- **Implementing structural changes**: The energy transition needs to encompass and advance energy access for those who lack it, as the introduction of renewables often offers additional economic opportunities, moving away from traditional sources of energy. Fundamentally, for a successful inclusive energy transformation, the labour market (and the economy at large) should undergo structural changes to centre values of well-being and care rather than productivity. Women have to have a greater say in energy-related decision-making. Therefore, policies need to be put in place to support the labour market change and, consequently, societal norms.

In summary, including women equitably in the renewable energy sector (from investment priorities, project design, in construction, operation, and consultation and planning, or through the development of productive uses in the case of decentralised solutions) is critical to making the energy system inclusive and sustainable.

### Revalorising the central role of care jobs in our societies and acknowledging their environmental benefits

As defined by the International Labour Organisation (ILO), care work is the work of looking after the physical, psychological, emotional, and developmental needs of one or more people. It is mostly performed by women, is either paid (but under-paid as we will show below) or unpaid in the household context and comprises tasks such as education, healthcare, caring for people with sickness, disabilities, elderly and children.

In the EU’s highly gender segregated labour market, women make up to 76% of workers in the health and care sector, this figure even amounting to 95% for domestic cleaners and helpers. These figures are most likely to be underestimated as a large share of these jobs are performed informally. This informality is also the source of precarious conditions such as short-term and part-time contracts, exposure to chemicals, high risk of occupational diseases and results in care jobs being amongst the least paid in the EU. Not only that, but care work also relies heavily on immigrant labour in the EU as for example in 2018, 40% of care workers in Italy and Luxembourg were non-native. It is common practice for abusive employers to confiscate the passport of domestic workers or threaten them with deportation, accentuating the precarious working conditions for those women. These global care chains perfectly embody the fact that care work is “the work that makes all other work possible”. Access to the labour market by some women (mostly white and middle to upper-class) has been made possible mainly by the transfer of care work to less privileged and often racialised women rather than by, in heterosexual relationships, men taking a more equal share of care work.

As explained in Chapter 5 of this report, the undervalue of paid care jobs is directly linked to the underestimation of care in our society. Indeed, next to the care industry, care
work is also performed at home for free mostly by women in heterosexual relationships. As demonstrated by many feminist thinkers since the 1970's, it is as if society at large, and men, consider that women were born to perform these tasks on a sacrificial and selfless mode and thus leading to care work not having to be compensated in the labour market at the same level of other jobs or to an amount that reflect their invaluable contribution to society. Care jobs are creating social and environmental benefits for our societies. We urgently need to expand our understanding of green jobs to include care jobs and make them benefit from the same economic advantages that green jobs hold - higher pay, social benefits and protection, safety standards in health and protection from harassment.

Firstly, care jobs are already low-carbon jobs. As they rely more on the intensive use of labour rather than on the intensive use of energy or raw materials, we assume that they are already greener than jobs in other sectors of the economy. As close to no data exists on this, we encourage the EU to develop and finance research that assesses the impact of care work on the environment and wider well-being.

Secondly, alongside an ageing population in Europe, climate change and environmental destruction will put more pressure on the care demand as new diseases appear. Zoonotic diseases are likely to rise in the future if we do not halt deforestation, extractive activities and the hunt of wild animals. Next to environmental protection measures, we should make sure that Member States make public investments in care infrastructures and that care workers enjoy decent work, fair wages, and social protection coverage as recommended in the ILO Domestic Workers Convention.

Thirdly, we should also take a wider perspective of sustainable jobs rather than just an environmental framing. As explained in a report by the Century Foundation, “Investing in and valuing the human capacity to care for and educate people is essential for any sustainability agenda. This work is needed for the continuation of humanity, for raising an informed and healthy next generation and for mitigating the harmful impacts of climate change”.

Finally, care work is part of an economy that centres wellbeing, inclusion and resilience, rather than growth and productivity, which could be expanded through a universal right to care. As demonstrated in Chapter 5 of this report, this kind of economic model is also beneficial for the planet. Alternative jobs policies such as universal basic income and working time reduction should be explored as a recent report from the European Environmental Bureau (EEB) shows it has environmental benefits, is in the interest of gender balanced care and promoting a better work-life balance.

However, the care sector is not 100% green, as exemplified by the high usage of chemicals and the large amount of single-use plastic waste and varying carbon emissions in the health sector. On top of traditional ways to become circular such as reducing waste or switching to renewable energy, the care sector could benefit from developing Green Care practices. Green exercise, ecotherapy or care farming, provide a healthier life and improved well-being to beneficiaries, better working conditions for employees, reduced pressure on traditional health and care sectors as well as providing education, raising employability and social cohesion for our societies. These practices are also very much aligned with ecofeminist approaches that centre human health and environmental protection.

**How could we leverage the European Green Deal’s potential?**

In the European Green Deal, jobs are mainly addressed in two policies: the Just Transition Mechanism and the Renovation Wave.

The Just Transition Mechanism, presented by the European Commission as “a key tool to ensure that the transition towards a climate-neutral economy happens in a fair way, leaving no one behind” appears entirely oblivious to gender and intersecting inequities, and rather socially-blind except from acknowledging geographical (and linked socio-economic) inequalities by providing support for regions that rely mostly on extractive and carbon-intensive industries, mainly in Eastern Europe. By overlooking gender aspects, the 150 billion euros of loans and investments that are promised to finance the reskilling of workers in brown industries and to support the creation and safeguarding of green jobs will reinforce the existing gendered segregation and inequalities that stem from these sectors. We call on the European Commission to revise these criteria and include the potential of increasing the share of women in all their diversity in male-dominated jobs as well as explicitly quoting the care sector as one of the potential beneficiaries of the mechanism.
As explored in Chapter 12, the Renovation Wave is also gender blind. It mentions the importance of increasing the share of women in the building sector, but without setting clear measures on how to do this. Instead of leaving this to the interpretation of Member States, the EU in the implementation phase of the strategy should set targets on the fair share of women, with an intersectional perspective. The EU should also suggest concrete steps to Member States to increase women participation in the workforce. Efforts in this area should be included in the criteria for obtaining funding earmarked for renovation.

As our chapter focused solely on the care and energy sectors, it is worthwhile to mention that, in their implementation, other sectoral policies of the Green Deal are also gender blind when it comes to job creation. For example, the Biodiversity Strategy mentions the potential creation of 500,000 jobs in nature protection but does not encourage member states to take this opportunity to introduce gender-specific measures. Moreover, as explained in Chapter 7 of this report, while the EU has imposed gender equality and green transition conditions to accessing the recovery funds, a first assessment of the plans presented by the Member States show that they fail to fund the care sector or initiatives to improve the share of women in traditional green jobs, which are key elements for a gender-just green transition.

The fact that the transition leaves out women is also hindering current EU efforts to improve gender equality at work. For example, the work-life balance directive adopted in 2019 and currently being transposed in the national laws of Member States as well as the current discussions on the directive proposals for Pay Transparency and Adequate minimum wages are gender-sensitive and mention an intersectional perspective. This is a striking example of the fact that by proposing legislations and policies in silos, the EU, since its inception 70 years ago, has failed to achieve its commitment to gender equality in the labour market.

Summary of our recommendations

In the following months:
- The Member States should transpose the work-life balance directive as soon as possible in their national legislation.
- The European Parliament and the Council should agree on reinforced provisions in the directive proposal on pay transparency, especially replacing self-declarations with mandatory external pay audits and add specific requirements for organisations of less than 250 employees.
- The European Parliament and the Council should further agree on reinforced provisions of the directive proposal on adequate minimum pay by proposing specific measures for those areas where pay is very low, such as the gender-segregated services sectors in general and care in particular.
- The Council should rediscuss the Women on Board directive tabled in 2012 by the Commission introducing mandatory quotas of 40% of non-executive members of the under-represented sex on company board, as this goes hand in hand with less environmental litigation.32
- The European Commission should table revised, gender-aware versions of the Just Transition Fund and the Renovation Wave funding to integrate a criterion of increasing the share of women in the benefitting industries and including the care sector as one of the beneficiaries.

In the following years:
If we are to achieve a gender-just transition to green jobs, Member States should, in the long term, advance transformative legislations to challenge the status quo around gender inequalities in the job market and ensure a meaningful and efficient gender-mainstreaming in its (green) job policies. These could include:
- Binding targets on the share of women in all their diversity in male-dominated environmental sectors, such as renewable energy and energy efficiency, public funding for measures aiming at gender-balancing the workforce (training, targeted recruitment, awareness-raising campaigns) and penalties in case of non-compliance.
- Collectively agreed decent working conditions, reinforced social rights for care workers and public investment in care infrastructure and in other highly feminised, low-carbon and essential sectors (for example culture).
- Working time reductions. These measures would bring many environmental and social benefits as well as liberate time for all people to engage in care activities without the risk
of being penalised on the job market for it, as explained in a recent report by the EEB.\footnote{33}

- Job guarantees schemes for renewable energy, green care and other socially and environmentally sustainable jobs. By using public funding to invest in these initiatives it will ensure fair conditions to workers and a transformative potential for our society and planet.

Finally, as capitalism, patriarchy and racism are the systems from which the inequalities in the labour-market derive, as explained in Chapter 5 of this report, we should envision a new economic model for the EU that abandons GDP growth and centres inclusion, care and well-being for the people and the planet alike.

\begin{itemize}
\item \footnote{1} World Economic Forum, \textit{Global gender gap report 2021}, 2021, Geneva: World Economic Forum
\item \footnote{2} Clare Wenham, \textit{The gendered impact of the COVID-19 crisis and post-crisis period} (Brussels: European Parliament, 2020)
\item \footnote{3} European Union, European Commission, DG Justice and Consumers, \textit{2021 report on gender equality in the EU}, 2021, Brussels: European Commission, 23-24
\item \footnote{4} Ibid., 25
\item \footnote{5} European Union, European Institute for Gender Equality, \textit{Gender Equality Index 2020}, Digitalisation and the future of work, 2020, Luxembourg: Publications Office of the European Union
\item \footnote{6} Nancy Fraser, \textit{“Contradictions of capitalism and care”}, New Left Review, no.100 (2016): 99-117
\item \footnote{8} IRENA, \textit{Global Renewables Outlook: Energy Transformation 2050}, (Abu Dhabi: International Renewable Energy Agency (IRENA), 2020)
\item \footnote{10} Ibid.
\item \footnote{11} Joy Clancy and Mariel Feenstra \textit{Women, gender equality and the energy transition in the EU}, (Brussels: European Parliament, 2019)
\item \footnote{12} IRENA, \textit{Wind Energy: A Gender Perspective}, (Abu Dhabi: International Renewable Energy Agency (IRENA), 2020)
\item \footnote{13} Ibid.
\item \footnote{14} Vestas becomes first wind energy supplier to set long-term safety targets, along with high ambitions for employee diversity, Vestas (accessed May 6, 2021)
\item \footnote{15} International Labour Organization, \textit{ABC of women workers' rights and gender equality}, (Geneva: ILO, 2007)
\item \footnote{16} Essential workers, \textit{European Institute for Gender Equality (EIGE)} (accessed April 29, 2021)
\item \footnote{17} Camille Fiazdo et al., \textit{Precarious work from a gender and intersectionality perspective, and ways to combat it} (Brussels: European Parliament, 2020)
\item \footnote{18} SDG Watch Europe, \textit{Time to reach for the moon}, (Brussels: SDG WE, 2020)
\item \footnote{19} Arlie Russel Horschild, "Global care chains and Emotional surplus value", in \textit{Justice, Politics and the Family} (New York: Routledge, 2015)
\item \footnote{20} For more information on this, refer to the works of Christine Delphy and Sandra Laugier in France or Carol Gilligan in the USA
\item \footnote{21} Najat Vallaud-Belkacem and Sandra Laugier, \textit{La société des vulnérables. Leçons féministes d’une crise}, (Paris: Gallimard, 2020)
\item \footnote{22} Amanda Novello and Greg Carlock, \textit{Redefining Green Jobs for a Sustainable Economy}, (The Century Foundation, 2019)
\item \footnote{23} United Nations Environment Programme and International Livestock Research Institute, \textit{Preventing the next pandemic - Zoonotic diseases and how to break the chain of transmission}, (Nairobi: UNEP, 2020)
\item \footnote{24} \textit{Decent work}, International Labour Organization (accessed in June 2021)
\item \footnote{25} Amanda Novello and Greg Carlock, \textit{Redefining Green Jobs for a Sustainable Economy}, 10
\item \footnote{26} Kathy Wiese and Jan Mayrhofer, \textit{Escaping the growth and jobs treadmill}, (Brussels: EEB&EYF, 2020)
\item \footnote{27} \textit{Chemicals, Practice GreenHealth} (accessed April 20, 2021)
\item \footnote{28} Byeong-Kyu Lee et al., "Analyses of the recycling potential of medical plastic wastes", Waste management, Vol. 22, no. 5 (2002): 461-70
\item \footnote{29} Lotfi Belkhir and Ahmed Elmeligi, "Carbon footprint of the global pharmaceutical industry and relative impact of its major players", \textit{Journal of Cleaner Production}, Vol. 214 (2019): 185-94
\item \footnote{30} \textit{The just Transition Mechanism: making sure no one is left behind}, European Commission (accessed April 19, 2021)
\item \footnote{31} Industries that rely heavily on fossil fuels and does not consider the negative side effects that their production and consumption patterns have on the environment
\item \footnote{33} Kathy Wiese and Jan Mayrhofer, \textit{Escaping the growth and jobs treadmill}
INTEGRATE GENDER & INTERSECTIONAL APPROACH INTO GREEN BUDGETING & TAXATION

By Lisa Tostado and Katy Wiese
Disclaimer: This chapter was written between April and May 2021 while the national recovery plans were finalised and then analysed by the European Commission. Latest development such as the final approval of the plans by the European Commission came out later and are therefore not included in our analysis.

(Green) Gender Budgeting

“Many disparities and inequalities between the sexes have become embedded, to a greater or lesser extent, in the baseline of public policies and the allocation of public resources”, states an Organisation for Economic Co-operation and Development (OECD) report on
gender budgeting from 2017.\textsuperscript{1} Budgets are a powerful economic tool to transform societies and economies and enhance equality. The other side of the coin is money collection. In most countries of the world, governments collect fees and taxes to generate public revenue that make it possible to invest in essential public services.\textsuperscript{2} While taxation can also enhance gender equality and incentivise a green transition, this chapter will focus on the budget side due to the revenue structure of the European Union (EU), which consists mostly of national contributions, custom duties on imports, and VAT based resources. Direct taxation is the competence of Member States (MS).

**Green and gender-sensitive taxation:**

The tax system in EU member states has largely been focused on enhancing economic growth - often neither fair nor green - and blind to gender differences. In general, the tax burden has been shifting from corporate taxes to labour income, widening the inequality gap.\textsuperscript{3} Furthermore, only 6\% of EU revenues originate from environmental taxes.\textsuperscript{4} Environmental taxes (and the tax system in general) are often proclaimed as gender-neutral while perpetuating systemic inequalities in unpaid care work, employment rates, pension, income, poverty and wealth. Studies have shown that economic instruments, such as higher energy prices and carbon taxes, present a higher burden for women, due to their higher poverty risk, especially among migrant communities or single mothers.\textsuperscript{5} To avoid backlash, pricing negative environmental externalities always needs to be embedded into a coherent social policy framework and a social compensation structure. More progressive (environmental) taxes that combat social injustices, gender inequalities, environmental destruction and crisis are needed.

Gender budgeting - by incorporating gender equality aspects in all stages of the budget process - offers an approach to policy makers and public finance institutions to shift towards outcomes that support and improve gender equality in the long-term. Gender budgeting is not so much about having separate budgets or dividing expenditures, but rather about taking a gender analysis approach to collection and spending of public resources and to improve the collective understanding of how decisions impact women and men differently. To address additional structural inequalities, it is important to apply an intersectional approach by understanding and analysing the diverse realities of people's lives and the effects of gender, race, sexual orientation, disability, age, and other characteristics that structure people's experiences of the public services, spaces and institutions that they seek to use.\textsuperscript{6}

**Gender Budgeting in Austria**

Austria is one of the few countries worldwide whose constitution has stipulated Gender Budgeting. Since 2009, and reinforced via a federal budget law in 2013, federal, regional and local authorities have to aim for equality between men and women in their financial management and budgets. Each Austrian ministry has to define a maximum of five outcomes per budget chapter which are part of the annual budget decision in the parliament. At least one of these outcomes has to be a gender outcome. While challenges with the level of ambition of objectives and indicators remain, it has increased transparency and participation of women in the process and contributed to better targeted policy measures.\textsuperscript{7}

Green budgets refer to tools that aim to achieve environmental and climate objectives by analysing the environmental impacts of budgetary and fiscal policy choices. Budgeting can therefore be a tool to mainstream gender equality and environmental objectives at the same time. For instance, investments in public transport rather than new road infrastructure are both green and boost gender equality because women tend to rely more heavily on public transit.\textsuperscript{8} Climate mitigation policies could be thought of as gender-just by definition as climate change disproportionately affects women and minority groups in the Global South because they are more vulnerable due to, inter alia, higher livelihood dependence on natural resources threatened by climate change and a higher likelihood to live in poverty limiting...
their capacity to adapt to climate change. However, if the gender lens is not applied when designing the policy, gender inequalities can be perpetuated.

Many ways to combine both green and gender-just budgeting exist: Investing in care fulfils green and gender equality requirements and is furthermore relevant from an intersectional point of view as many migrant women work in the care sector.

The European Green Deal and Gender in the Current EU Budget

The Council of the EU, the Commission and the European Parliament approved the Multiannual Financial Framework, the EU’s seven-year budget, and the Recovery Programme “Next Generation EU” in February 2021. It will allow the EU to provide an unprecedented €1.8 trillion of funding over the coming years to support recovery from the COVID-19 pandemic and the EU’s long-term priorities across different policy areas. The European Green Deal and its objectives played an important role during the lengthy negotiations, whereas the first proposals were blind on the gender dimension. This section looks at whether the current budget has the potential to reap co-benefits arising from green and gender budgeting.

The Multiannual Financial Framework (MFF)

The EU budget can be an effective financing tool to implement the European Green Deal, but also to promote a gender-just society. While accounting for just over 1% of the EU’s overall GDP, the budget has significant political weight and leverage on Member States as well as an important signalling function.

Before the current MFF, gender budgeting has not been applied systematically to all parts of the EU general budget. Instead, the principle had been pursued through specific programmes, mainly those tackling employment and social issues. The legal requirements with respect to gender budgeting vary from one spending programme to another. Still in 2018, the spending review of current programmes that accompanied the Commission’s proposal for the 2021-2027 MFF found that gender equality had not been mainstreamed.

The EU Budget 2021–2027: green parts benefit mostly male dominated sectors

The EU budget is projected to reach €662 billion over the coming years. While climate spending is projected to account for 37% of the budget, transport and construction projects dominate the allocation. The MFF Multiannual Financial Framework supports the European Green Deal and the recovery from the COVID-19 pandemic.
General introduction/Setting the scene

The EU member states administer large parts of the EU budget and report on climate spending using an established methodology. While the EU had agreed to make at least 20% of EU expenditure climate-related in 2014-2020, this number increased to 30% for the next MFF. Even though many problems remain, with a mixed record on climate spending overall, mostly due to the continued existence of incoherent spending programmes, and unsatisfactory monitoring, there is a history of data compiling, tracking, reporting and discussing the climate impact of spending programmes. Not so for gender – despite comprehensive work on tools for gender budgeting, for example by the European Institute for Gender Equality (EIGE).

Thanks to pressure from Civil Society Organisations (CSOs) and the European Parliament, the 2021-2027 MFF foresees gender impact assessments. This means that the programmes will be screened according to their impact on gender equality to establish gender tracking, similar to the climate tracking which is already in place. While this wording is good progress, more work lies ahead of us on a way to a budget that combines the promotion of gender equality and the green transition.

First, large spending programmes, also those that should contribute to the objectives of the European Green Deal, remain gender-blind – above all the EU’s Common Agricultural Policy (CAP) which represents about one-third of the overall budget and is the EU’s single biggest element of expenditure. As demonstrated in Chapter 14 of this report, by being gender-blind the CAP is probably damaging to gender equality as most subsidies go to male farm holders and reinforces gender stereotypes.

Second, it is noteworthy that the interinstitutional agreement only addresses equality between men and women in a binary and non-intersectional perspective, as described in Chapter 1 in this report. Notions of the complex interdependencies of greening the budget and gender budgeting are lacking.

Third, data that would make an analysis of gender equality possible in the first place is lacking. With gender budgeting being a toolbox that is only useful with gender-related data, this point is key.

The Recovery and Resilience Facility

On 27 May 2020, in response to the unprecedented crisis caused by the coronavirus, the European Commission proposed the temporary recovery instrument Next Generation EU (NGEU) of €750 billion. The lion’s share goes to the Recovery and Resilience Facility (RFF) which this section is focusing on. Green and digital investments are priorities, with spending benchmarks of 37% for climate and 20% for digital. This means the allocation of a large share of funds mobilised for economic stimuli to sectors with high shares of male employment, such as the energy, agriculture, construction and transport industries. The overrepresentation of male employees in these sectors is even higher in countries such as Italy and Spain which will receive particularly large shares of the Recovery Fund. Without adequate gender impact assessments, the green and digital priorities pose a significant risk of aggravating already existing gender inequalities, such as in relation to employment creation, job structure and quality, income, revaluation of jobs, social security, working conditions and segregation within the labour market. Further efforts are necessary to reduce the gender divide in these sectors as well, so that all genders benefit equally from the job creation potential of green branches of the economy.

Civil society and gender-sensitive members of the European Parliament put pressure on the Commission with the movement #halfofit, and demanded an update of the original gender-blind crisis plan. This led to a better inclusion of the gender dimension in several relevant dossiers, including the Recovery and Resilience Facility (RRF) which notes that governments “should set out the expected contribution to gender equality and equal opportunities for all.” However, the transition to a gender-just society and the green transition are not thought of together, but remain in silos. While the word “green” appears 22 times in the regulation, not once is it associated with gender. The section on gender does not contain a reference to the low-carbon nature of the care industry, either. The European Commission’s guidance for drafting the national recovery also provides some opportunities for gender mainstreaming. Yet, there are risks that the implementation will have shortcomings. First, the Commission only added gender mainstreaming at a later stage. This might have come too late to influence the EU and member states’ spending plans as the required gender perspectives risks to be added on top of already existing investment and reform priorities without influencing their content.
Second, the drafting and implementation of the national plans is in many countries dominated by economic actors, such as ministries of finance. Budgeting, financing and monetary policies remain male-dominated, often without adequate support for gender-sensitive analysis.

Lastly, at this stage it remains uncertain how seriously the gender analysis requirements will be implemented. The European Commission analyses the plans, if it considers that all requirements of the regulation are met, it then proposes to the Council that approves the disbursement of EU funds by qualified majority. The question is whether the gender mainstreaming dimension and the compliance with the categorisation of climate spending will be considered seriously during the assessment of the plans.  

Italy’s recovery plan

Let’s look at the example of Italy, the biggest beneficiary of the EU fund. The Italian government published its national recovery plan on April 25th with €222.1 billion allocated for investments, from which €191.5 billion will stem from NGEU package of grants and loans. According to the prime minister, the biggest beneficiaries of the Italian recovery plan are women and the young, in line with the plan’s aim to create a more equal society. 70% of people who lost their job during the pandemic are women in Italy. However, instead of using significant parts of the funds to invest in better care infrastructure and other measures that would boost gender equality and the transition to a low-carbon economy at the same time, the plan gives priority to digitalisation, buildings, automotive transport and energy, all sectors where men dominate without applying gender analysis. Plans on how to boost participation of women in sectors in which they are currently so underrepresented are needed, too.

The EU Taxonomy for Sustainable Finance

When addressing the question of how to spend money in a green and gender-just way, another EU policy file is worth mentioning: the EU Taxonomy for Sustainable Finance, a standard for sustainable financial products. This unified classification system sets out harmonised criteria to determine whether an economic activity is environmentally sustainable. Thanks to the inclusion of the ‘do not significantly harm’ principle, products will only be considered sustainable when they do not impede other EU environmental objectives. Potential negative impacts on the social and gender equality realm are absent. Currently, the European Commission is considering the development of a social taxonomy to fill this gap. There is a need for socially inclusive measures to accompany the green transition and just as for green transition, lack of definitions and a standardised classification system is an obstacle to steering the capital towards socially sustainable activities. This can include the activity itself, governance of a company and the way in which the activity is conducted.

While environmental screening criteria based on science and hard numbers only is more feasible, the Commission must now rapidly develop social screening based on human rights and concepts like gender equality. The green transition will need significant amounts of investment. To succeed, they need to be both environmentally and socially sustainable which should be reflected in a single taxonomy in the future.

Recommendations

- We need a broader understanding of the necessary transition. A low-carbon economy is not only about the fields of energy, buildings, transport, and digitalisation, sectors in which male-employment dominates. We should always consider low-carbon care and service industry jobs alongside these priorities and treat them as equally important in the budgeting process. The transition goes beyond employment-related issues, including most notably unpaid care and domestic work, which is under-valued and neglected in economic decision-making. Investments in care do not only have highly positive employment and economic recovery effects but also address the key challenges towards building truly resilient European low emitting economies. We need a transition towards a gender-just digital, green and care economy, that leaves silo thinking behind.

- We need better gender-disaggregated data for effective gender budgeting and an equivalent to the green recovery tracker for gender equality to support spending decisions and track progress. Monitoring the effectiveness of the RRF and national plans in
addressing gender equality problems requires adequate data and monitoring indicators. The same applies to green spending programmes under the European Green Deal, such as the Just Transition and the Renovation Wave.

- Gender and green budgeting are about the right spending priorities, but it is also important to generate the revenues in a gender-sensitive manner. This topic goes beyond what this chapter was able to cover. It is nevertheless crucial to address the issue together with spending, especially as the question of how to generate resources for green and gender budgeting becomes more important as the need for public investments increases with the ecological and social transition. The EU has taken on common debt for the first time in history and needs to design policies now to pay them back in a socially and gender-just way. Their impact analysis should also include different genders beyond the EU, for example in the case of the planned Carbon Border Adjustment Mechanism, as mentioned in Chapter 8 of this report.

Conclusion

The most recent EU budget is “greener” than before, but a lot of work is ahead of us concerning its compatibility with the Paris Agreement and European Green Deal objectives. For the first time, the EU’s seven-year budget also includes gender budgeting and the stimulus package explicitly provides a gender-sensitive assessment of the impact. While both the centrality of the European Green Deal and the inclusion of gender budgeting are important steps forward, there is a risk that governments may not fully exploit these opportunities, especially when it comes to thinking about the two together instead of in silos. The European Green Deal and the digital agenda are important priorities, but policy-makers must not pursue them in a gender-blind manner. Unbalanced investments in the still male-dominated green and digital sector may deepen the gender employment and investment gap. More of the budgets need to go for example towards care which can boost well-being and is low emitting by nature. Gender democracy also requires a higher share of women’s participation in the power, transport, buildings and digital sectors and governments need to pursue policies that tackle the existing gender divide.

Very little research exists on combining gender and climate budgeting for EU spending. This needs to change. We hope that this chapter has provided food for thought.

1 Ronnie Downes et al., “Gender Budgeting in OECD countries”, OECs Journal on Budgeting (2017)
2 Rachel Sharpe, Making tax work for women’s rights (2016)
3 Katy Wiese and Jan Mayrhofer, Escaping the growth and jobs treadmill: a new policy agenda for post-coronavirus Europe (Brussels: European Environmental Bureau and European Youth Forum, 2020)
4 Environmental tax statistics, Eurostat (accessed June 1, 2021)
5 Ulrike Roehr and Minu Hemmati, A gender-sensitive climate regime; Velma I. Grover, Global Warming and Climate Change — Ten Years After Kyoto and Still Counting (CRC Press, 2016)
6 “Gender Budgeting”, EIGE (accessed May 17, 2021)
7 “Austria”, EIGE (accessed June 2, 2021)
8 OECD, Paris Collaborative on Green Budgeting, OECD Green Budgeting Framework (2020)
9 Gender, Climate and Security: Sustaining inclusive peace on the frontlines of climate change (United Nations Environment Programme, UN Women, UNDP and UNDPPA/PBSO, 2020)
13 “Supporting climate action through the EU budget”, European Commission (accessed May, 2021)
14 Martin Nesbit, “Climate tracking in the EU budget needs a more robust system”, Institute for European Environmental Policy, Original publication July 22, 2020 (accessed May, 2021)
15 “An EU Budget to address the climate crisis”, European Environmental Bureau (accessed May, 2021)
16 “Gender Budgeting”, EIGE (accessed May 17, 2021)
17 European Parliament, Council of the European Union, European Commission, European Union: Interinstitutional Agreement between the European Parliament, the Council of the European Union and the European Commission on budgetary discipline, on cooperation in budgetary matters and on sound financial management, as well as on new own resources, including a roadmap towards the introduction of new own resources, 16 December 2020, L 433 I/28
18 “Commission publishes study on the CAP’s impact on the development of rural areas regarding socioeconomic aspects”, European Commission, Original publication February 18, 2021 (accessed May, 2021)
22 While the climate spending target may seem ambitious, the devil is in the detail. Evidence (“Ongoing assessment of national recovery and resilience plans by the commission”, The Greens/EFA in the European Parliament, Original publication June 1, 2021 (accessed June 15, 2021)) shows that many governments do not apply the ‘do no significant harm’ principle, and circumvent, ignore or do not address the categorization of green investments - leading to green-washing and in some cases to a potential breach of the 37% spending requirement for green investment.
23 Looking at spending in the transport sector more specifically furthermore shows that large shares go to the automotive sector where female participation in the labour market is even lower. Investments in inclusive public transport or walking and cycling infrastructure are insufficient.
24 Irene Pimminger and Nadja Bergmann, Gleichstellungsrelevante Aspekte der Digitalisierung der Arbeitswelt in Deutschland: Expertise für den Dritten Gleichstellungsbericht der Bundesregierung (Wien, 2020)
27 “Gender mainstreaming the Covid-19 EU recovery policies: opportunities and challenges”, Tampere University, Original publication March 30, 2021 (accessed May, 2021)
29 Hannah Roberts, “Italy promises greener, fairer society in Europe’s biggest coronavirus recovery plan”, Politico, Original publication April 25, 2021 (accessed in May 2021)
30 “Frauen im Deutschen Gewerkschaftsbund”, DGB Frauen, Original publication February 18, 2021 (accessed May, 2021)
31 “Omnibus Dibattito - Puntata 24/04/2021”, La7, Original publication April 24, 2021 (accessed May, 2021)
32 “EU taxonomy for sustainable activities”, European Commission (accessed in May, 2021)
33 European Commission, Directorate-General for Financial Stability, Financial Services and Capital Markets Union, COMMISSION DELEGATED REGULATION (EU) …/... supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives, 2021, C/2021/2800 final
34 “Series of webinars on the EU taxonomy – Discussion on future developments with the Platform on Sustainable Finance”, European Commission (accessed May, 2021)
36 “Tracking the contribution of national covid-19 recovery efforts towards a climate neutral EU”, Green Recovery Tracker (accessed May, 2021)
37 Åsa Gunnarsson et al., Gender equality and taxation in the European Union (European Union, 2017)
38 Patrick ten Brink et al., A Budget to address the Climate Emergency: How to fund the European Green Deal (Heinrich-Böll-Stiftung Brussels European Union and European Environmental Bureau, 2019)
IV

MAKING THE EU GLOBAL FOOTPRINT ENVIRONMENTALLY SUSTAINABLE AND GENDER JUST
THE EU’S GLOBAL TRADE AND INVESTMENT AGENDA, ENVIRONMENTAL PRESSURES AND GENDER EQUALITY

By Gea Meijers and Isabelle Brachet
Introduction: Trade in the European Green Deal

The European Green Deal (EGD) sets very important objectives to engage Europe in a just and green transition. However, it is gender-blind, and silent on the contradiction between promoting an ever-growing trade liberalisation and the need to reduce Europe’s climate and natural resource footprint. The EGD proposes to thicken the edges of the European Union (EU) trade policy, with a focus on facilitating trade and investment in sustainable raw materials and green goods and services. But it does not announce a deep rethink, whereby international trade should only be incentivised (by removing tariffs and non-tariff barriers) when it is compatible with Europe’s climate commitments. The EGD’s proposal to include in EU trade deals “a binding commitment of the Parties to ratify and effectively implement the Paris Agreement” is symbolically important. But if increasing global trade in goods and services, which is the main focus of trade agreements, prevents us from limiting global warming to 1.5°C, it is nothing more than greenwashing.
Impacts of international trade on women and the planet

Europe over the last thirty years has been promoting a trade policy that pushes towards opening up foreign markets for European investments, goods and services, and protects investors over human rights, decent work and environmental standards. Insufficiently regulated trade and investment liberalisation has enabled the emergence of global value chains that are built on the use of an underpaid labour workforce with limited trade unions rights, on the over-exploitation of natural resources and on environmental destruction. The EU trade policy incentivises competition in a hyperglobalised economy based on a race to the bottom in terms of wages, working conditions, tax avoidance, and lax environmental regulation. This race to the bottom is facilitated by a greater mobility of foreign investments, which has been an important objective of the EU through removing barriers and risks in trade agreements for foreign direct investments (FDI). Investments in low income countries often take the form of mergers and acquisitions or other rent-seeking activities, failing to fulfil the promise to create new employment opportunities in those countries. Such investments do not support a green transition either. The investors’ protection provisions in bilateral investment treaties/free trade agreement investment chapters can also prevent restrictions on activities which are bad for the environment and the climate.

While trade and investment liberalisation has helped to create many jobs in the Global South in export sectors such as garments, textiles, shoes and agriculture and food processing, these jobs are low paid, characterised by poor working conditions and limited rights to unionise and social protection coverage. The United Nations Conference on Trade and Development (UNCTAD) has been showing that lead firms, usually based in wealthy countries including many EU member states, retain most of the value and wealth created in supply chains. Countries in the Global South are stuck at the bottom of the value chain and often compete against each other for investment by keeping wages low and relaxing labour regulation. Women from the Global South are among the most vulnerable to

In low-income countries (the 1/3 poorest countries of the planet: Africa, South Asia, etc.), tax revenues went from 15.6% of gross domestic product in 1970-1979 to 13.7% in 1990-1998 and 14.5% and 2010-2018, partly due to the uncompensated decrease in customs duties and other taxes on international trade (which brought in 5.9% of GDP in 1970-1979, 3.9% in 1990-1999 and 2.8% in 2010-2018). In high-income countries (the 1/3 richest countries of the planet: Europe, North America, etc.), customs duties were already very low at the start of the period and tax revenues continued to rise, before stabilising. Sources and series: http://piketty.pse.ens.fr/files/ideologie/png/G13.12.png
exploitation in global supply chains. There has been a feminisation in the manufacturing sector for export-oriented production, as international competition demanded the use of relatively cheap labour to cut costs. Gender-blind trade liberalisation has been entrenching and perpetuating existing gender inequalities in society, affecting women in their diversity through disproportionate job losses in sectors that are not ready to face international competition, livelihoods at risk, and a generation of underpaid jobs in exporting sectors, often with poor working conditions.

Beyond these direct impacts, dismantlement of tariffs on imports translated in revenue loss for governments, of low income countries, as illustrated in the graph “Tax income and trade liberalisation 1970-2018”. Many countries in the Global South tried to compensate the loss of tax revenue on international trade with regressive taxes increasing inequality (such as VAT). The reduction of government's income leads to an erosion of public services, making healthcare, safe and clean water, education less accessible to people in terms of distance, scope and prices. It also hinders an expansion of social protection coverage. This in turn creates an additional burden on women and girls as providers of most of the unpaid care and domestic work, as they step in where the state cannot provide adequate support.

**Example: agriculture, global trade and gender equality**

The EU trade policy has been promoting an export-oriented model of intensive and specialised agriculture. It incentivises the ever-growing international trade of few commodities rather than encouraging partner countries and European farmers to diversify and to move away from industrial livestock production and chemically-intensive monocultures. This model has adverse impacts on women farmers and on the environment (water contamination, Green House Gas emissions (GHG), deforestation, loss of biodiversity among others). Greater biodiversity is important to strengthen farms’ resilience against climate change – but also has wellbeing implications – household food baskets lose their variety and wider nutritional composition when less bio-diverse crops are replaced with mono-culture.

Where large-scale cash cropping has been introduced, the tendency is for men to become involved in this sector, especially when it is highly mechanised. Women have also been crowded-out of crops that were traditionally grown by them once they became commercially viable, e.g., bananas. Women's autonomy over indigenous and non-commercial seeds is also undermined, as seed monopolies cemented by intellectual property rights included in Free Trade Agreements (FTAs) increase their penetration within communities. Loss of autonomy over farming processes has a correlation within women's wider decision-making power at household and community levels.

Almost 90% of all farms globally are run by families and rely primarily on family labour, even if unpaid labour on family farms is often not captured in data. In the Global South, women are generally over-represented in subsistence agriculture, and when they do have access to land, it is often of poorer quality and in smaller plots.

An EU trade and investment policy that preserves the space for partner countries to support small-scale food producers, their transition towards ecologically diverse food systems, and territorial (local, national & regional) markets is likely to benefit women as they are over-represented in small-scale farming in many countries in the Global South. It would also be good for the planet. Women are much less likely to use purchased inputs such as fertilizers and improved seeds or to make use of mechanical tools and equipment - because they do not have the cash needed. Agroecological practices therefore represent an opportunity to build their resilience to climate change and stabilise their yields.

*Let’s take a step back:* International trade allows us, Europeans, to consume goods and products that we could not afford if workers would earn fair wages and benefit from social protection, if women’s unpaid care and domestic work was recognised and redistributed, and if the environmental costs were reflected in the price. This extractive and exploitative model finds its roots in colonial times, when countries with more power and technology started exploiting the natural resources from the Global South (such as sugar, cotton, minerals, etc), with slaves providing the workforce for free. This model also perpetuates and benefits from patriarchy and structural gender inequality. Time has come to move away from this consumption and production model.
How does the current EU trade policy incorporate gender and climate considerations?

The EU trade policy adopted in 2021 reiterates the intention to support decent work and social fairness. It also includes strong references concerning the fight against climate change and the loss of biodiversity. The narrative is greener than in the past. On gender equality, however, it is extremely weak, only outlining the intention “to develop a better understanding of the gender equality implications and inform actions for improved gender awareness in trade policy”.

The Commission is proposing a stronger emphasis on creating market access opportunities for green goods and services produced in Europe and regulating digital trade at global level. However, developing, and especially least developed countries do not have the resources to invest in these promising sectors, and when they do, global trade rules prevent them from coming to scale. They need technology transfer, waivers on intellectual property rights, and important levels of protection for their nascent industries to build a strong domestic green economy. The EU should therefore remove restrictions on the ability of developing countries to require technology transfer (e.g., for climate change technologies), both in the World Trade Organisation (WTO) (the WTO’s general exception for the environment is too restrictive) and in its FTAs. As far as digitalisation is concerned, the EU’s proposed e-commerce rules at the WTO should be changed as they would reduce developing countries’ revenue in a number of ways – preventing investments in gender-responsive public services and in a just and green transition.

EU trade deals include a chapter on trade and sustainable development, a chapter or provision on gender equality, and in the future a chapter on sustainable food systems. As long as these chapters do not allow to prevent and redress adverse human rights and environmental impacts of the trade agreements themselves, short-sighted economic interests will continue to prevail over women’s rights and environment. “These chapters should prevail over all other provisions in the Agreements.”

A planet-friendly trade and investment policy that is good for women in all their diversity

For the EU trade policy to comply and even serve Europe’s climate and environmental objectives, the overall volume of traded goods should be reduced to a level that respects planetary boundaries. When local production for local consumption and shorter (local, national and regional) supply chains are a better solution from an environmental perspective, taking GHG emissions from transport into account, they should be prioritised. In addition, FTAs should only incentivise trade in goods and services that do not harm the environment, rather than removing tariff and non-tariff barriers irrespective of whether the sectors are carbon-intensive, or harmful to the environment.

This should be done bearing in mind that under the Paris Agreement, developing countries have common but differentiated responsibility, and early-industrialised countries should transfer financial resources and technology to allow them meeting their commitments.

Example: Promoting a gender-transformative and ecological transition in agriculture

In agriculture, we need to move towards diversified, ecologically and socially sustainable food systems, in particular those based on agroecology. Shorter food supply chains need to be encouraged, as well as territorial markets – as opposed to ever-growing global value chains, whereby food is considered as a commodity only. In the Global South, women play a pivotal role in those localised food systems, even if much of their trading in local markets or at the farm gate is also not adequately captured by data. Women could therefore particularly benefit from such a shift.

The EU should stop proposing liberalisation of government procurement in its FTAs. Trade and investment agreements should allow the use of public procurements to support local food systems, providing an exception to the principle of equal treatment for foreign and domestic actors so as to favour domestic producers/suppliers over imports. The EU
trade agreements should not enforce intellectual property rights on seeds (no reference to the International Convention for the Protection of New Varieties of Plants / UPOV in trade agreements anymore), as it benefits seed companies to the detriment of small-scale farmers seed systems, which are crucial to preserve biodiversity and strengthen their resilience to climate change. Governments should also be able to guarantee the land rights of local communities with a gender-transformative approach, without facing liability risks under Investor-State Dispute Settlement Mechanisms (ISDS).27

But what about women and men employed in large scale commercial export-oriented agriculture? In the Pacific, many women work on coffee plantations e.g., in South and Southeast Asia, women supply a significant amount of the labour on plantations, producing tea, rubber and fruit. In Southeast Asia, they also play a major role in rice production.28 In some cases, these monocultures for export may have to be replaced with diversified production for territorial markets, but the production of raw agriculture commodities for export will continue to a certain extent. Supporting women in agriculture should therefore not be limited to small-scale food production, but efforts also need to be made in large scale commercial agriculture where it exists – while not expanding this production model. Women should however not simply be pulled into new value chains without appraising and addressing the disadvantages that arise due to the systemic discrimination they face. Power relations within existing value chains should be fundamentally transformed to ensure women have every opportunity to realise their rights.

The way raw agricultural commodities are produced will also have to transit towards climate resilient sustainable models of agriculture with decent work conditions. These shifts can and should be encouraged by the EU trade and investment policy, and they need to be designed in a gender-transformative way.

Recommendations

Gender-blind trade and investment policies, even if they are designed to serve Europe’s climate policy, may exacerbate existing gender inequalities, with different effects depending on intersecting factors of discrimination, such as geographic location, social status, race, caste, religion, ableism, ethnicity, and other factors. This is why the shift towards a climate-compliant trade policy needs to be designed from the outset to be gender-sensitive or better, gender-transformative.

This notably implies to:

- **Respect the “do no harm principle”,** ensuring no provisions proposed by the EU in trade/investment negotiations (whether in the WTO/FTAs or bilateral investment treaties) undermine gender equality or restrict the adoption of measures to fight climate change.
- **Regulate investments:** The EU, home to many investors, should move beyond the green non-binding taxonomy, and adopt a brown taxonomy defining which investments are harmful for the planet, with sanctions or disincentives to fully and urgently end them. We also need a social taxonomy including gender equality requirements. Countries in the Global South should be supported by the EU to regulate foreign direct investments as well, so that they contribute to drive their economy towards a green and gender-transformative transition. The EU should stop restricting partner countries’ regulatory space they need to require local contents and technology transfer from FDIs, in particular for climate-friendly technology.29
- **Climate and environmental impact assessments.** Climate and environment should be much better addressed in Sustainable Impact Assessments including a gender transformative lens. These assessments should be taken into account when designing trade deals. They should guide which sectors should or should not be liberalised, and under which conditions.
- **A robust new sustainable food systems chapter.** This chapter should ensure that trade agreements stop incentivising an unsustainable model of agriculture – in particular intensive export-oriented monocultures – and protect local food systems and short food supply chains. The EU trade and investment policy needs to support a just transition in agriculture, in Europe and in partner countries, making sure it contributes to transform gender-relations in agriculture.
European countries' should commit to reduce imported emissions. We have been increasingly consuming products made far away, and the resulting GHG emissions are accounted for in the emissions of producing countries such as China. European countries’ should commit to reduce GHG emissions linked to imports in their Nationally Determined Contributions (NDCs).

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1. This perspective is widely shared by civil society, including women’s rights organisations, see: Seattle2Brussels Network and the Unity Statement of the Gender Trade Coalition


3. e.g. see Vattenfall case where Germany tried to impose environmental requirements on a coal-fired power station and Lone Pine fracking case and Keystone pipeline case in https://www.citizen.org/article/table-of-foreign-investor-state-cases-and-claims-under-nafta-and-other-us-trade-deals

4. Isabelle Brachet and Gea Meijers, Women’s right and trade: time for a radical shift (Brussels: CONCORD Europe, 2018)


7. Setting affordable prices for essential services like water, healthcare, education, electricity etc can be harmed by the EU’s services domestic regulation discipline proposals in FTAs, e.g. see Some analyses of domestic regulation discipline - compilation for MC11. The EU’s proposed investment rules in bilateral investment treaties/free trade agreement (FTA) investment chapters can also prevent regulations preventing water companies to cut off consumers who can’t pay their bills, e.g. see Vivendi case in Potential human rights impacts of the TPP

8. UN Women report: progress of world’s women 2015-2016, transforming economies, realizing rights finds that women spend on average 2.5 more time to unpaid care work compared to men

9. UNCTAD Virtual Institute Teaching Material on Trade and Gender (Volume 1), https://i.unctad.org/tag/docs/vol1/vol1m22.pdf


13. FAO 2014, 2018c


15. FAO, Women in Agriculture: Closing the gender gap for development (Rome, 2011)

16. FAO, Women in Agriculture: Closing the gender gap for development


20. E.g. see Intellectual Property and Technology Transfer Issues in the Context of Climate Change for some of the ways that intellectual property (IP) can be a problem when trying to deal with climate change, and Intellectual Property Relevant in the 21st Century


23. The plurilateral Information Technology Agreement and its expansion (which requires the removal of tariffs on IT products in them) see Process of Trade Liberalization under the (ITA): The Indian Experience: Difficulties replacing lost tariff revenue for middle and low income countries: Tax Revenue and (or?) Trade Liberalization. It would also stop authorities from checking source code for cheating on taxes: Some preliminary implications of WTO source code proposal. And prevent governments from requiring a copy of tax records to be stored locally so the can be checked for cheating on taxes, as New Zealand etc require, e.g. see Preliminary analysis of aspects of some WTO e-commerce proposal.
also How ‘Digital Trade’ Rules Would Impede Taxation of the Digitised Economy in the Global South and Joint Statement Initiative on E-Commerce (JSI): Economic and Fiscal Implications for the South

23 For more, see CAN Europe’s Position Paper on trade and trade policy, Sept 2020
24 UNFCC, Art 4.7
25 For more details on what the EU should do on food systems in the external action, see Joint NGOs paper, Raising the Ambition on the Global Aspects of the EU Farm to Fork Strategy, 2020
26 e.g. in EU proposal on Public procurement in the EU-Indonesia FTA from http://trade.ec.europa.eu/doclib/press/index.cfm?id=1620
27 Kate Dooley et al., Missing Pathways to 1.5°C: The role of the land sector in ambitious climate action, 2018.
28 e.g. in IPCC, Climate Change and land: An IPCC special report on climate change, desertification, land degradation, sustainable land management, food security, and greenhouse gas fluxes in terrestrial ecosystems, 2020.
29 “Women’s contributions to agricultural production and food security: Current status and perspectives”, FAO (accessed June 15, 2021)
28 E.g. the EU’s FTA proposals (e.g. Art 2.6.1b) in Title on Investment and Trade in Services it doesn’t allow Indonesia to require local goods/services or workers to be used in the sectors listed.
THE CLOTHES WE WEAR: FROM THE LONG SHADOW OF COLONIALISM TO GENDER AND ENVIRONMENTAL JUSTICE

By Patrizia Heidegger
The textile industry has for centuries been one of the most powerful industries across Europe. Its history is inextricably linked to colonialism, slavery and racialised capitalism. The plundering of natural resources and the profiteering from cheap labour – mostly women and children in the Global South – along supply chains from the cotton fields to sweatshops continue in the 21st century. What kind of systemic change is needed in the EU to move away from the broken system that supplies the clothes we wear?

The cotton empire

With the onset of industrialisation in the 18th century, the mechanisation and concentration of the textile industry starting from North West England not only undermined the livelihoods of cottage industries across the Continent, but also forced the deindustrialisation of colonial India. Before the Industrial Revolution, Mughal India was the largest textile manufacturer globally, an industry systematically destroyed by the colonial rulers. Starting in the 1780s, Britain pushed for the exports of its machine-made and low-cost cloth while introducing tariffs on the import of Indian products. By the middle of the 19th century, Britain produced half of the world’s clothes while causing mass unemployment for India’s spinners and weavers (and those in Continental Europe). The alignment of the colonies’ productive sources to serve the
profit of the empire went hand in hand with the exploitation of the lower classes in the home country. A large majority of the work forces in the British mills consisted of underpaid young women and children.3

The cotton-based textile empire was built on the slave trade and indentured labour in cotton plantations, the expropriation of indigenous lands in America and the coercion of weavers in India forcing them to work for European trading companies. Close to 2 million slaves ensured the production of cotton for European markets working on more than 74,000 plantations in the US.4 “[…] a trail of blood runs through the history of cotton. It lives from conquests and land grabbing, from exploitation and inequality. And of interlinkages: the life of a weaver in India was linked to that of a slave in the US, that of a trader in England to that of a Native American family”5. By 1860, 88% of the cotton supply to the Lancaster mills were sourced from slave plantations.5

The long shadow of colonial power relations

Fast forward to the 21st century: Europe is still one of the largest markets for textiles in the world and home to some of the world’s most powerful fashion brands and textile retailers. Clothes are one of the drivers of our fast-turning consumer society. Each year, the average European buys 26 kg of textiles resulting in 5.8 million tonnes of textile waste per year.6 With rising labour costs and better protection of workers’ rights across Europe, not only the sourcing of raw materials but also the manufacturing has progressively been shifted to countries with cheap labour and weak health and safety standards. The manufacturing hubs are now mostly in the Global South, many in former European colonies in South and Southeast Asia. In 2019, the EU Member States imported clothes worth €154 billion with more than half being produced outside the EU. In just one decade, the imports of clothes to the EU increased in value by 62%.7 Most of the clothes imported from outside the EU were manufactured in China, Bangladesh and Turkey, followed by the UK, India, Cambodia and Vietnam.8

In Bangladesh, the second-largest manufacturer of clothes for the European market, 80% of the 4 million workers are women from impoverished or economically disadvantaged backgrounds.9 Many of them are regularly subjected to involuntary and excessive overtime while not receiving a living wage. They face harassment and ill-treatment in the factories, many of which do not comply with basic safety standards.9 The collapse of the Rana Plaza garment factory in 2013 was the deadliest of a long series of accidents, killing more than 1100 factory workers, mostly women. At various stages of the textile supply chain – but particularly during production processes to wash, treat, dye, print, and finish fabric, so-called ‘wet processes’ – women workers come into contact with a range of chemical substances, many of which are known to be hazardous to human health.10

Today, the textile industry’s business model is deeply rooted in dependence on cheap fossil-fuel derived synthetic fibres. In 2000, polyester overtook cotton as the dominant fibre on the market.11 At the same time, cotton remains a key resource of the global textile industry and is mainly sourced from China and India. 75% of cotton farmers do not earn enough to feed their families.11 The price for cotton on the global market has dropped to an all-time low. In India, farmers borrow money, incited by global seed and pesticides manufacturers, to buy GMO seeds with the promise of better yields. Caught in the trap, dependent on expensive productive means from multinationals and with debt they cannot repay, more than 300,000 cotton farmers in India have committed suicide since 1995.14 Diversion of water for irrigation, the excessive use of pesticides and the conversion of habitat into farming land for cotton have had severe impacts on the environment such as around the Aral Sea and the Indus Delta in Pakistan.15 In India, 50% of all pesticides used are applied to only 5% of farming land – the cotton fields – where child labour and the exploitation of women workers are widespread.16

The need for a paradigm shift

Despite awareness around the conditions in global textile supply chains, the EU and Member States have for decades given a free ride to European fashion brands and retailers, arguing in favour of voluntary self-regulation. Policy measures to shift away from a system that profits from the exploitation of natural resources and female labour mostly in the Global
The clothes we wear in the South are limited and scattered. The fact that high profits for fashion brands and retailers as well as the availability of fast fashion in markets such as the EU is only possible through an unjust global trade system remains unaccounted for. What we have failed to do so far is the “historical work of making visible the scale and spread of racialized capitalist[s], shaping economies that to this day remain white-dominated hierarchies of inequality”.

On the contrary, the argument that the textile industry is offering work to millions of cotton farmers and garment workers and has contributed to women’s emancipation has been misused to mask the deeper, underlying injustices and power imbalances that are rooted in the history of racialised capitalism. When the Covid-19 pandemic struck in spring 2020, workers were laid off without any social security. The Clean Clothes Campaign has calculated that in the first three months of the pandemic only between $3.2 billion and $5.8 billion of wages were not paid, laying bare the reality that those women in the sweatshops become irrelevant the day they do not produce profit for those dominating the trade.

**Recommendations**

Late in 2021, the European Commission will present an EU Strategy for Sustainable Textiles as well as its Sustainable Corporate Governance initiative. To ensure environmental and gender justice in the textile industry, the Strategy must:

- be based on a robust gender analysis of the environmental and social crises in global textile supply chains.
- reckon with the effects of a racialised separation of those holding the power and making the highest profits and the global labour force, putting an end to a system where multinationals and consumers in some parts of the world benefit from exploiting cheap labour and natural resources in the Global South.
- present a coherent overarching framework that ties together the many different policies that are needed to set Europe on a transformative path to sustainable and globally just textile production and consumption.
- bring the sector in line with what is known as a ‘safe operating space’ to preserve the life-sustaining ecological functions through taxing virgin resource use, caps on raw material use and making producers responsible for their products from cradle to grave.
- ensure that their license to operate must depend on ensuring the full enjoyment of all human rights and a decent living standard for all workers, in particular women, along the supply chains.
- make sure that the EU textile industry can be held accountable and liable for its role in the world through a trade reset and strong human rights and environmental due diligence rules.

The Wardrobe Change campaign has presented a detailed set of “Recommendations for the EU Textile Strategy for Sustainable Textiles” focusing on environmental sustainability.

The Civil Society European Sustainable Textile Strategy calls out the broken system with its devastating impact on workers in the supply chain and brings to light the fragility and power imbalances of the sector while providing a detailed strategy of how to move forward.

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Ibid.


Source: Fair Wear Foundation, see: https://www.fairwear.org/programmes/countries/bangladesh/.


According to the German Ministry for Development Cooperation, quoted in Pörnbacher (2020).


V

CLIMATE
HOW THE EUROPEAN GREEN DEAL CAN ADDRESS GENDER DIMENSIONS OF CLIMATE POLICIES

By Gotelind Alber
Climate justice is often understood as referring to the North-South divide only, but the concept is also relevant within regions and nation states. Those parts of society that contribute the least to the problem, often suffer most from its consequences, due to gender and other axes of discrimination such as racism. If gender is not considered as a relevant category in climate policy, structural power relations and inequalities are likely to be maintained and even exacerbated.

This chapter will briefly explain the gender aspects and dimensions of climate policy, analyse key European Union (EU) documents from a gender perspective, present an approach to integrate gender into climate policy, and will conclude with recommendations.

Gender aspects and available evidence

There is increasing evidence that gender, as well as other categories of inequality, play a role in all aspects of climate policy: in its causes, effects and the responses to the climate crisis. It should be noted that the observed gender differences should be seen in the context of societal norms and responsibilities and their dynamics. Therefore, it would be important to put more efforts into examining the underlying reasons of gender differences, including an intersectional approach, in order to use this knowledge for designing effective and just policies and measures.
Gender differentials in carbon footprints

There are strong indications that women’s carbon footprints tend to be lower than those of men. First, women have, on average, lower incomes than men, and statistics provide a clear relation between income and consumption, including personal living space, mobility and air travel. Moreover, for single person households in several European countries, it has been shown that men are responsible for an 8 to 40 per cent larger carbon footprint than women, mainly due to their mobility and dietary behaviour, and independently from income. A UK study showed that female headed households and people with Black, Asian or Minority Ethnic (BAME) backgrounds are less likely to have a large carbon footprint than male-headed and households of white people, in particular due to their lower indirect emissions from consumption. Beyond the private realm, men’s jobs are usually much more carbon intensive, e.g. in heavy industry or mining, than those of women who constitute the majority of workers in sectors such as service, education and care.

Impacts and vulnerability

People in a society are not equally exposed to the impacts of climate change. There is extensive evidence of the disproportional adverse effects on women and girls by slow-onset events and extreme weather such as droughts, floods, heatwaves or cyclones, because they are structurally disadvantaged and have poorer access to mobility, resources, land, education and information. Yet, research findings are mainly focusing on low-income countries. For Europe, there is a lack of sex-disaggregated data. However, there is some evidence on differential impacts, in particular the effects of heat stress on women. Moreover, lower-income groups tend to live in less well-insulated buildings and are thus more exposed to heatwaves. Women with their lower income, particularly single mothers or elderly, constitute a majority of these groups. While natural disasters decrease the life expectancy of women more than that of men at global levels, it should be noted that in certain cases, there can be more fatalities among men, mainly due to their personal risk behaviour. During and after extreme weather events, women who are usually responsible for caring for affected family and community members are subject to a higher work load. Disproportionate impacts due to race, class and gender became obvious after Hurricane Katrina hitting New Orleans (US) in 2005. There is also evidence that sexual violence against women and girls worsens after natural disasters, resulting from masculine behavioural patterns of coping with stress.

Response at individual level

Attitudes and preferences that influence the behaviour of individuals, as well as their specific capabilities to adapt to, or mitigate climate change, are dependent on various factors such as income, education, age, norms etc. There is substantial evidence that gender plays a major role, with women in most cases being more concerned about climate change and willing to change their behaviour towards a more sustainable lifestyle, yet hampered by specific needs for thermal comfort, safety or information. Most of the evidence is based on surveys, and, for example, affirmed by field tests in various European countries investigating practical actions in the private sphere. Another consequence of gendered concerns and preferences has become visible in the Fridays for Future movement: these protests were strongly dominated by young women, in particular school students.

Policy response

Due to a number of factors such as income disparities and the gender division of labour, climate policies have different impacts on the various genders. These can be distributional effects, for example if the costs are borne by the entire society, but jobs or profits enabled by the policy benefit only a certain part of society. Some policies, e.g. fiscal measures such as carbon taxes, can have disproportionate adverse effects on people with lower income, in particular women.

If these unintended effects are not taken into account, climate policy measures can reinforce or even increase gender disparities. On the other hand, if designed appropriately, climate policies can offer great opportunities to contribute to gender equity. Also, policymakers can rely on women as supporters when adopting ambitious targets and determined actions.
Analysis of the main drivers of gender inequalities

In the context of climate policy, the following Gender Dimensions have been identified. They describe driving forces for gender inequality, as well as spheres of life that are particularly important for gender relations. These dimensions serve as searchlights for gender analysis in climate policy and practice:

**Symbolic order:** This cross-cutting dimension refers to social hierarchies and power relations that find their expression in the symbolic order of a society. This order permeates structural organisation as well as institutional and personal actions, but is also produced and reproduced by them. Through representations in language, visualisations, architectural designs, narratives, conceptions of the future, etc., meanings are generated and values are ascribed by constructing, constituting and reproducing notions of normality and differences. This attribution of meanings and valuations is the root cause of the observed gender disparities and affects all other gender dimensions described below. In order to achieve gender justice, this gender order must be changed, and this change can be effectuated by identifying and addressing the gender dimensions presented below.

**Institutionalised androcentrism:** This gender dimension refers to the gender bias in the power of definition, which is rooted in systems and institutions that are based on masculinity models. Discourses, problem perceptions, priorities, approaches, and methods are not gender-neutral, but rather shaped by androcentrism, with masculinity models serving as standard and benchmark. This impedes a critical reflection of framings associated with social masculinity and eventually leads to a gender bias in problem reception and strategy definitions.

**Gender representation:** This gender dimension refers to gender-balanced participation in decisions in science, technology, planning and policy-making, as well as the consideration of gender expertise in these processes. For evidence on women's underrepresentation in the domain of climate policy-making and implementation, see Chapter 2 of this report.

**Care economy:** This dimension refers to the social values, norms, structures and institutions that cause and perpetuate an unequal gender-specific attribution, distribution, valuation and recognition of paid and unpaid care work. Even employed women in the EU spend 3.3 hours per day for childcare, compared to 2.7 hours for men. During the COVID-19 pandemic, the gender care gap even increased: Women spent 35 hours per week caring for children and 18 hours per week doing housework, compared to 25 hours care work and 12 hours housework per week for men. Many climate change mitigation measures have an impact on the everyday routines of people, e.g. through changed mobility behaviour or energy saving measures. Due to their greater contribution to care work, including escorting children and elderly, women are particularly affected by these measures (see also Chapters 11 and 12 of this report).

**Market economy:** This dimension is about the horizontal and vertical segregation of jobs, which leads to an underrepresentation of women in climate relevant sectors such as energy, transport, agriculture and forestry, in particular in leading positions. Moreover, typical ‘female’ jobs such as in the care and service sectors are systematically valued and paid less than typical ‘male’ jobs, thereby contributing to the gender pay gap and eventually resulting in even larger pension and wealth gaps. Therefore, policies that rely on economic instruments such as CO₂ pricing affect women more severely, while job creation due to climate policies and measures mainly benefits men. For more information on the relevance of this dimension see Chapter 6 of this report.

**Public resources and infrastructures:** This gender dimension is particularly relevant for both climate change mitigation and adaptation measures. Women’s mobility behaviour, for example, generates lower emissions than that of men (see Chapter 13 for more information). Women are therefore particularly dependent on good infrastructural facilities in their living environment. Spatial and gender relations are closely intertwined. Access to and usability of public spaces and resources such as parks, playgrounds and service facilities have direct effects on the performance of care work and employment, participation in public life and physical and mental health. The same applies to infrastructures such as energy,
water and transport systems as well as the corresponding services and their orientation and prioritisation in terms of usability for everyday life (see Chapter 13).

Body, health and safety, privacy and intimacy: This dimension refers to the social organisation of intimacy shaped by social norms, values and ideas of masculinity and femininity and the unequal positions of the different genders created by these. This is about sexual orientation, the self-determined disposal of one’s own body and health as well as the choice of partnership models, sexuality and reproduction. Physical differences between genders and age groups concern, for example, health status (e.g. life expectancy), as well as the physical reaction to environmental pollutants (e.g. air pollution) or environmental conditions (e.g. temperature). For example, the higher temperature sensitivity of women is well documented.\(^{20}\) This is relevant for both climate mitigation and adaptation.

Analysis of selected programmatic EU policies and documents on climate change

This section will particularly look at the EU Climate Law (in process) and the EU Adaptation Strategy (February 2021) with a gender lens.\(^{21}\)

EU Climate Law and National Energy and Climate Plans (NECPs)

The EU Climate Law\(^{22}\) is one of the key elements of the European Green Deal (EGD) and enshrines the EU’s commitment to reaching climate neutrality by 2050 and the intermediate target of reducing net greenhouse gas emissions by at least 55% by 2030, compared to 1990 levels.

The EU Climate Law, in its version from 25 June 2021, mentions gender in Art. 9 (Public Participation) “The Commission shall use all appropriate instruments, including the European Climate Pact, to engage citizens, social partners and stakeholders, and foster dialogue and the diffusion of science-based information about climate change and its social and gender equality aspects”, as well as in Art. 12 (Amendments to Regulation (EC) No 401/2009) to ensure, among others, gender balance in the European Scientific Advisory Board on Climate Change that is to be established. Yet, it does not include provisions to address gender inequality in policy-making. The 2020 EU-wide assessment of NECPs is lacking any mention of gender.

This is not surprising, because the Regulation on the Governance of the Energy Union and Climate Action (EU 2019/1999) that defines the requirements for NECPs, does not refer to gender in its rules, even though a reference is made to the provisions on human rights and gender equality in the Paris Agreement in the rationale.

EU Climate Adaptation Strategy

In the Paris Agreement, specifically for adaptation there is some language on gender: “Parties acknowledge that adaptation action should follow a country-driven, gender-responsive, participatory and fully transparent approach, taking into consideration vulnerable groups, communities and ecosystems, […].”

The EU Adaptation Strategy (2021)\(^{23}\) acknowledges “the impacts of climate change are not neutral. Men and women, older people, persons with disabilities, displaced persons, or socially marginalised have different adaptive capabilities. Adaptation measures need to consider their situation” (Section 2.2.2. Fostering local, individual and just resilience, p.7). Social inequalities that climate change can worsen are mentioned in several parts of the Strategy (e.g. in section 2.2.1, p.1 and 4). Also, a footnote makes reference to the EU Gender Equality Strategy and Disability Rights Strategy (Chapter 3: stepping up international action for climate resilience, p.18), yet does not focus on EU domestic, but on its external policies. However, the rest of the document does not mention gender and fails to adequately address gender and other inequalities in the proposed actions. In particular, it does not sufficiently elaborate on resilience in the sense of enhancing resilience of the most vulnerable parts of the population. For example, the Recovery and Resilience Facility, which is expected to enhance resilience, addresses primarily technologies in the energy, transport and digitalisation sectors, and neglects social aspects.
According to the Adaptation Strategy the Commission will “mainstream climate resilience considerations in all relevant policy fields applicable to both the public and the private sectors” (Section 2.2., p.7) and states that some more sectors deserve further consideration. Yet, throughout the document, the care sector is not even mentioned, even though we learned during the COVID-19 pandemic that this is one of the most vulnerable sectors. Paid care services as well as unpaid family care are severely affected by climate variability, e.g. as a result of disasters and vector-borne diseases. As a result, the care crisis which has become obvious in the pandemic, is very likely to be aggravated (see also Chapters 5 and 6 of this report).

The strategy acknowledges that our understanding of the nexus between climate hazards and socioeconomic vulnerabilities and inequalities needs to be improved (section 2.1.1., p.4). Yet, in the commitments for action related to this section, it says more vaguely “help to close knowledge gaps on climate impacts and resilience”.

In section 2.2.2, the Commission sees the need for education, training and reskilling initiatives, but only towards green jobs / green growth, which is usually understood as technology related fields of work such as renewable energies. Moreover, the analysis lacks recognition of the systematic neglect and underpayment of care related jobs and unpaid work.

The strategy involves several elements on communication, education etc., e.g. within the section 2.2.2. Yet, there is no mention of gender-sensitive communication, while at UNFCCC levels, the area of communication, education and training, and participation is considered to be a core area to take gender issues into consideration.

On monitoring, reporting and evaluation, the strategy refers to the ‘Implementing Regulation on the Governance of the Energy Union and Climate Action’ which includes (voluntary) reporting on gender in the context of adaptation, and plans to further develop suitable indicators and a resilience assessment framework based on the experience gained with adaptation preparedness scoreboards for the earlier version (2013) of the Adaptation Strategy. But these scoreboards do not mention gender or social inclusiveness.

**Conclusions and recommendations**

The UNFCCC process and its outcomes commit all UNFCCC Parties – including the EU and its Member States – to work for gender balance and gender-responsive policies. While originally the UNFCCC and the Kyoto Protocol did not contain any references to gender or women, since 2001, and particularly after 2010, numerous decisions have been taken at UNFCCC levels to specifically address gender and integrate gender consideration into processes and policies, thanks to strong advocacy from women’s organisations and some Parties.24 The Paris Agreement of 2015 calls upon Parties to respect, promote and consider, among others, human rights, gender equality, and empowerment of women when taking action to address climate change. UNFCCC Parties agreed on the Lima Work Programme on Gender and a Gender Action Plan (GAP), with an enhanced version adopted in 2019. The GAP defines objectives and activities, mainly in the fields of training for women, and broad capacity building on gender issues, in order to prepare for gender mainstreaming in climate policies.

Moreover, the EU Gender Equality Strategy (2020-2025) states on climate change that, “addressing the gender dimension can therefore have a key role in leveraging the full potential of these policies”, and several resolutions of the European Parliament emphasize the need to develop gender-responsive climate policies, e.g. in the resolution on the European Green Deal of 2020.25

Yet, in the above mentioned EU documents on the EGD, a systematic gender perspective is completely lacking, neither are concrete steps provided on how to achieve a gender-responsive climate policy.

In order to enhance gender-responsiveness in climate policy and action, we recommend five steps:

- First of all, gender equality should be integrated into the objectives of climate policy, for example in the form of a shared vision such as ‘working towards a low carbon, clean, resilient, inclusive, socially and gender just society’. This is a precondition for the policy coherence given the cross-cutting character of both climate and gender equality policies;26
- Second, at the institutional level, governance and participatory approaches should ensure equal representation of the genders, as well as gender awareness, knowledge and tools, and the involvement of gender institutions, gender experts, and women’s organisations;
- Third, climate action programmes need to be screened, e.g. through a gender analysis
or gender needs assessment, to ensure that priority issues from a gender perspective receive attention, as well as technical and financial support, such as public transport, access to energy services, or resilience building in communities;

- Fourth, planned policies and measures need to undergo a Gender Impact Assessment (GIA) to explore unintended impacts on gender equality and develop gender-responsive policies, along the gender dimensions explained in section 2 above. For this, sex-disaggregated data need to be collected and analysed;
- Fifth, gender should be included into monitoring, using tools such as Gender Budgeting, and developing and applying gender-specific indicators.

Moreover, a dedicated EU Climate Change Gender Action Plan should be prepared, in order to strengthen commitment and clarity for all stakeholders, comprising concrete steps paving the way towards a gender-responsive climate policy in the coming years, including responsibilities, deadlines and deliverables. The Climate Change Gender Action Plan should include, among others,

- Capacity building and awareness-raising on the gender and climate nexus among policymakers and civil society;
- Intensifying research on gender and climate change relevant sectors, and collecting quantitative and qualitative gender related data, e.g. on gender-specific vulnerabilities using an intersectional approach and on care-related mobility and energy consumption;
- Funding of a broad application of Gender Impact Assessments and making the results available to policy-makers and civil society at regional, national and local levels;
- Full integration of gender in the reports and plans to be submitted to the UNFCCC Secretariat and the European Parliament.

On the EU documents analysed above, we recommend specifically:

- In the proposed Climate Law, principles on how to achieve the objectives should be In case of an amendment of the Climate Law, principles on how to achieve the objectives should be added, including provisions to ensure that policies and measures are gender-responsive, and fully respect human rights, indigenous rights and intergenerational equity. This could be, for example, a preamble similarly as in the Paris Agreement. Moreover, Art 4.5 (c) should be strengthened and gender equality should be included. Art 6 and 7 on the assessment of EU and national policies and measures should include provisions to assess the compliance with the principles mentioned above.
- As for the NECPs, the amendments to Regulation EU 2018/1999 in Art 13 of the Climate Law should be further amended to include a mandatory assessment of social and gender impacts of policies and measures.
- In the EU Adaptation Strategy (2021), in case of a revision, gender should be integrated throughout the document, in order to address gendered vulnerabilities, paid and unpaid care work, gender-sensitive communication and training, collection and use of sex-disaggregated data, and monitoring and reporting on gender-responsive actions and their outcomes. Moreover, the knowledge gap on impacts, vulnerability, adaptation and gender in the EU should be urgently closed.

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4 Christian Nellemann et al., Women at the Frontline of Climate Change: Gender Risks and Hopes (UNEP, 2011)
6 Ibid.


Other critical issues, e.g. whether “net zero” is a valid approach to comply with the Paris Agreement, are not subject of this analysis.


We Push for a Decolonial Perspective on climate Justice

Credits?

By

VI SUSTAINABLE, CARBON-NEUTRAL COMMUNITIES AND INFRASTRUCTURES THAT WORK FOR ALL
GENDER DIMENSIONS OF THE ENERGY TRANSITION AS AN IMPORTANT PILLAR FOR SUCCESSFUL CLIMATE POLICY

By Katharina Habersbrunner, Marika Kuschan, Christine Lins and Anja Rühlemann
Gender Dimensions of the Energy Transition as an Important Pillar for Successful Climate Policy

Introduction

The European Green Deal seeks ‘to tackle climate and environmental-related challenges,’ ensuring a ‘just transition for all.’ Yet, the gender-environment and gender-energy nexus is still absent. The following chapter explains how the aim of leaving no-one behind and the ambition to hasten the energy transition away from old energy patterns and fossil sources
will be successfully reached. Despite scientific evidence of gender differences in energy technology preferences, needs and access, gender is not reflected in national energy plans nor in the European Union’s (EU’s) overall energy strategy. Moreover, even ‘gender-neutral policies related to energy and enterprises tend to benefit men more than women because women face higher barriers and restrictions’. Thus, it is essential to implement a Green Transition with ambitious gender-responsive and intersectional energy policies by considering six different gender dimensions. Other distinctions exist, however these gender dimensions, including productive and reproductive work, infrastructure and public resources, body and health, power and decision making as well as androcentrism, have been repeatedly reliable.

Relevance of gender dimensions

DIMENSION: Productive work
Engaging in productive work refers to the ability to access and undertake paid work and also implies the choice of profession, the possibility of career opportunities, manageable working hours and fair and ongoing remuneration within the European energy sector. Currently, there are about 1.3 million people contracted in the renewable energy sector in the EU (directly in production and indirectly within the value chain). The ‘Women, Gender Equality and the Energy Transition in the EU’ report from 2019, suggests that in Europe in 2016 women represented on average 35% of the workforce in the renewable energy sector. While women perform better in the renewable energy workforce, their share of employment falls below that of the economy at large, which is 40 to 50% in most of the OECD countries. Women are particularly underrepresented in STEM-related jobs (28%), a much lower share than in administrative jobs (45%). However, specific barriers for women to enter the energy sector are prevailing hiring practices, as well as the lack of relevant skills or awareness based on gender-specific differences in boy’s and girl’s education. Other challenges relate to the lack of an inclusive working environment like flexible working hours, affordable child-care options, networking, training opportunities and gender equality targets.

DIMENSION: Reproductive work
Reproductive work entails activities without financial remuneration that centre around taking care of other persons, like household chores, supervising children or volunteering - essential tasks within any society. Gender is historically embedded along with practices, social roles, and cultural norms. For example, the German gender-care-gap clearly shows that women spend significantly more time performing care-tasks: on an average day, a woman invests 52.4% more time on reproductive work than a man (corresponding to 87 minutes). This also contributes to gender-based differences in energy consumption patterns, since most of the reproductive work is performed at home. Energy consumption is affected by socially shaped behaviour depending on role attributions as well as biological factors, such as comfort temperature. Studies show that different patterns in energy consumption among men and women exist across Europe. Whilst women generally consume less energy, they consume more within the household, due to their responsibilities. In existing energy policies, like the EU Renewable Energy Directive, the different gender roles concerning reproductive work are not reflected at all. On the other hand, social acceptance, welfare systems or behavioural attitudes in the economy hardly support men to take over care work.

DIMENSION: Power and decision making
In order to achieve a socially just and gender-responsive transition, it is important to ensure that gender perspectives factor into decision making. In the EU, women and minority groups remain underrepresented in decision-making positions across different sectors. In 2020, of the EU-28 national ministries: only 29.5% of ministers are women and their share in the parliaments amounts to 30.3%. In national ministries dealing with environment, transport and energy, the share of female ministers is 26.8%. The share of female members of boards in the largest quoted companies, supervisory boards or board of directors is 26.6%. To be successful, policies and programmes addressing the energy transition must include the participation, experience, and decision-making power of women in all their diversity – both because the consequences of such energy policies differ among social identities led
by gender, and because women’s knowledge and experiences will contribute to building more resilient communities and nations. Gender-responsive policies and projects can only deliver results if they are awarded the necessary funds (gender budgeting). Gender audits, understood as an important tool of gender mainstreaming that entail analysing legislation, regulations, taxation, and specific projects for their effect on the status of women in society, help to highlight gender perspectives of public policy measures and in the private sector. Improving gender diversity in the workplace is predominantly an issue for individual companies and other organisations, however, governments have an important role to play in incentivising action in this field. Numerical goals for gender diversity and equity can be an important indicator of progress, e.g., targets for recruitment of new staff, greater gender balance in the workforce and management boards in particular.

**DIMENSION: Infrastructure and public resources**

Well-planned and inclusive infrastructures include the different roles and particular needs of all genders and their ability to use infrastructure. Yet, mobility and energy infrastructure services are rather gender-blind. As highlighted in Chapter 13 of this report, mobility patterns are highly gendered, mainly accounted for by the division of roles in the labour market and care economy, which affect women’s employment conditions, income levels and mobility needs. The realities of women’s lives are still ignored and a consolidated gender perspective in energy and mobility policymaking is still far from being achieved. Most of the grant programs for renewable energy and mobility do not apply a gender lens. For example, in Germany, grant programs for electro mobility are most beneficial for men because they tend to receive higher salaries and thus can afford more expensive e-vehicles while also using company cars more often. Also, financial support programmes on local, national and at the EU-level aiming to increase energy efficiency and to reduce energy poverty do not consider gender at all, as exposed in Chapter 12 of this report. While the significance of gender inequality in energy poverty has been partially recognised, it is neglected in the financial aspect of the support programs. Moreover, the energy transition requires the use of land and buildings. Women still have highly unequal access to land and building ownership relative to men. For instance, only between 6.1% (Netherlands) and 34.5% (Austria) of agricultural land is owned by women. These asymmetries in ownership can lead to the exclusion of women from the process of negotiation, consultation and compensation between energy project operators and local communities, since project operators typically approach owners and community leaders.

**DIMENSION: Body & Health**

Health is considered ‘one of the fundamental rights of every human being’ and implies a multi-dimensional state of well-being that includes physical, social, and mental aspects and is strongly linked to energy consumption. Still, not all European citizens have access to electricity or can afford the total amount of energy they need. About 7% of EU households were unable to pay their utility bills on time in 2018, including one third of households both in Greece and in Bulgaria. The situation in which a household lacks socially and materially necessitated level of energy services at home (also known as energy poverty) has direct negative impacts on people’s health and well-being, as further described in Chapter 12. Particularly low-income earners (of whom a majority are women) and elderly (who spend a lot of time at home) tend to be more affected by energy poverty. Moreover, on average, women do not only prefer higher indoor temperatures than men, but also perform better on certain tasks when staying in appropriately heated rooms. Furthermore, access to clean energy also improves everyday duties such as cooking and washing, tasks which are still predominantly taken care of by women. This too, enables children to study in the evening. While most research focuses on electricity at home, energy poverty is also related to mobility poverty (often described as fuel poverty), which refers to the lack of public infrastructure or lack of financial resources to use public infrastructures, with negative impacts on social participation and well-being. Yet, the effects of energy on health are not limited to consumption in the household. From initial fuel extraction to transport and waste disposal, energy systems are correlated with health risks and impacts.

**DIMENSION: Androcentrism**

Androcentrism has been manifested in all levels of political, social, economic, and scientific activity by placing masculinity at the centre and proclaiming it the social norm. This norm
claims gender neutrality for itself, as well as universality, objectivity and rationality while at the same time defining ‘femininities’ as a deviation or an additive.\(^{31}\) As long as the institutionalisation of androcentrism is not abandoned, the efficacy and continuance of gender hierarchy remains unchallenged. The fossil fuel energy model of the past 200 years has been gender blind.\(^{32}\) Persistent barriers still exist, e.g., data reveals that ‘most men working in the sector, presumably including those with responsibilities for making policy decisions, are unaware of this fact. Responses show that just 40% of men, as opposed to 75% of women perceive the existence of gender related barriers’.\(^{33}\) This results in gender inequalities in access to and control of energy, gender inequalities in the decision-making process and in financial and political gains, as well as spatial inequities in the allocation of energy and exposure to the externalities from energy production with more disadvantages for the female population. There is no such thing as gender-neutrality, e.g., technology is conventionally understood as a gender-neutral tool, although it is a constructed male domain. For example, ‘gender-neutral policies related to energy tend to benefit men more because women face higher barriers and restrictions’.\(^{34}\) Thus, the use of technology might reinforce gender asymmetries and inequalities. Similar disadvantages are generated if other social differentiators are neglected, such as education, migration background, ethnicity, age, etc. Therefore, the advantages of ‘an intersectional approach’ also brings with it an awareness that knowledge is situated and partial, which is a direct challenge to the universality claimed by [e.g.] techno-literate, white masculine perspectives in the field of energy research.\(^{35}\)

**ANALYSIS: gender shortcomings and gaps for the energy transition**

The Green Deal emphasises increased energy efficiency and a renewable energy based power sector. The presented gender dimensions show the links and urgency of gender just-policies.\(^{39}\) Despite these insights, gender is not reflected. The Just Transition Mechanism, aiming to leave no-one behind, mainly addresses geographical inequalities via reallocating funding for workers in coal regions that might have to change career paths.

Yet, the energy transition is a fertile ground to implement climate, gender, and social justice, as (changes in) energy systems are often confronted with power inequalities. Many countries in the Global South integrate the gender-energy nexus in their frameworks, in Europe it is just Spain.\(^{36}\) While the EU Gender Equality Strategy\(^{37}\) as well as the Directive on Regulation on the Governance of the Energy Union and Climate Action (EU) 2018/1999 clearly state that gender equality is to be respected and integrated in energy and climate plans, they lack reinforcement as well as coherence in the Clean Energy Package and the Green Deal. Even though the directive on Regulation on the Governance of the Energy Union and Climate Action (EU) is mentioned in the Green Deal, the relation between gender and energy is not put in context nor are clear gender policies communicated.

The Clean Energy Package puts the consumer at the centre of the energy transition with a clear right to produce and trade energy as an important pillar for the EU Energy transition policy.\(^{38}\) Producers and consumers as ‘prosumers’\(^{39}\) are able to participate actively, individually or through communities, in all markets with decentralized and participatory concepts. Fraune’s study in Germany shows how the larger social, cultural, and political context fosters and constrains women’s and men’s agency to take part in citizen’s schemes in the energy sector. The results reveal less representation of women in the ownership rate of citizen participation schemes, the average investment sum, and decision-making bodies. It shows that citizen participation schemes in renewable energy do not fulfil the claim of just and democratic targets per se. And the study gives an indication that beyond individual preferences and investment attitudes, cultural, social, and political factors also influence an individual’s agency to participate in citizens’ energy communities.\(^{40}\)

The energy transition presents a significant opportunity to address the gender deficits after the centralized fossil-based energy model and to embed principles of gender equality in the energy systems. To be truly transformative, energy access must be linked with an agenda that challenges the stereotypes of the role of women and that advances their rights, dignity, and visibility in their different roles as consumers, producers, investors, experts, mothers, and change agents. We cannot afford the disconnection between energy and gender. Such absence generates pathways disconnected from local realities, a lack public
buy-in and slow-down the energy transition. Women, and underrepresented groups need to be viewed as enablers of change rather than as vulnerable, marginalised groups at the mercy of powerful (male) actors. This means real agency in participation, recognition and decision making to set policy agendas. Considering the long operational life of energy infrastructure (e.g., public transport, energy efficiency), not mainstreaming gender will reinforce inequalities for decades, wasting limited financial, social, and human resources and missing ecological chances. The European Green Deal points out the role of citizens and needs: “the clean energy transition should involve and benefit consumers”, but lacks diversity and equality, neglecting the voices of women. Including the needs, rights, and talents of all genders would be a great instrument to realise a gender-transformative energy transition.

Good practice:

Still far away from gender-transformative energy systems, some good practices have been observed.

Spain: The government has created a new Ministry for Ecological Transition. It is the first of its kind, merging the former Ministries for Environment and Energy, and also led by a female minister. The new ministry has an ambitious outlook on the energy transition, a guiding roadmap toward the EU’s 2030 climate and energy goals. The national plan ranked highest of the EU Member States National Energy and Climate Plans, based on national targets, the comprehensiveness of policies, inclusiveness and participation.

Iceland: In Iceland, a share of 38% of decision-making power in energy companies resides with women as they hold significantly more chair boards in energy companies. The companies are legally obliged to have a gender ratio of at least 40% on their chair boards.

Bulgaria: Addressing energy poverty (including gender) requires integrated cooperation between ministries. Bulgaria shows this cooperation, where the Ministry of Labour and Social Policy, the Ministry of Energy, and the Energy and Water Regulation Commission are cooperating to establish a socially just policy for vulnerable consumers to secure their affordable access to energy and water services. By designating mechanisms for national gender equality policies based on specific principles, they seek to enable equal access to societal resources.

Recommendations

Gender plays a key role in energy decisions, needs and preferences regarding production, transmission, and consumption. Gender mainstreaming across energy policies and directives and practices is required in order to engender the energy transition. Following are some key recommendations for the European Green Deal:

- Redefining the energy transition so its focus goes beyond technical applications and economic profit and includes social aspects, needs and practices of all citizens who are directly or indirectly affected.
- Including not only environmental aspects but also social aspects in the revision of directives (e.g., Energy Taxation Directive).
- Obligation to have gender action plans and inclusive indicators (for gender-responsive monitoring and evaluation) in each energy-related division in politics and the economy (e.g., gender impact assessment and gender budgeting).
- Besides reinforcing quotas at the decision-making level in energy companies and political institutions, gender expertise needs to be strengthened among all genders, EU institutions need to become role models for gender-just communication in the energy field and for empowering not only female but gendered voices in the debate about energy transition, campaigns with the aim to attract more women and girls to STEM.
- Gender-just funding, energy consultations tailored to female consumers, sex-disaggregated energy research.
- Gathering sex-disaggregated data with an intersectional perspective (e.g., race, age, class, ability, gender identity and sexual orientation) and monitoring progress regularly (analysis and audit of energy production, distribution, and consumption).
We urgently call for holistic policies that focus on society and its diverse preferences, needs and practices according to gender, age, ethnicity, and cultures rather than mere technical and economic solutions. Applying an intersectional approach is likely to increase the success of future energy policies and projects due to the higher number of involved stakeholders, higher interests, and acceptance of the energy transition.
entrepreneurship and access to energy in the informal food sector"


41. ibid.


44. Joy Clancy et al., *Gender perspective on access to energy in the EU* (Brussels: Policy Department for Citizens’ Rights and Constitutional Affairs, 2017)


COMBATTING ENERGY POVERTY WITH GENDER JUST POLICIES

By Lidija Živčić, Irene González-Pijuan, Mònica Guiteras Blaya, Valbona Mazreku and Sergio Tirado-Herrero
Energy poverty occurs when a household cannot achieve the minimum level of domestic energy consumption required for satisfying basic needs and effective participation in society. This chapter deals with gender-specific impacts of energy poverty, current European Union (EU) policies in that intersection and presents specific policy recommendations.

The disproportional impacts of energy poverty on women

People affected by energy poverty may experience inadequate levels of essential energy services (e.g., indoor thermal discomfort), disproportionate energy expenses forcing them into undesirable decisions (e.g., the ‘heat or eat’ dilemma), or precarious access to energy (i.e., depending on unstable, insecure, or even illegal supply of energy).
Energy poverty results from structural inequalities in income distribution and access to quality housing, inadequate energy pricing and, vulnerable consumer support policies, and diverse household energy needs and practices. It is thus a distinct form of material deprivation with demonstrated impacts on physical and mental health.

According to existing literature, women and women-led households are disproportionately affected by energy poverty - a condition that becomes aggravated when gender inequality is exacerbated by age, class, and ethnic background among other factors. To explain how gender cuts across energy poverty, we need to address how the factors leading to energy poverty experiences are aggravated by gender inequalities, and how gender amplifies the impacts of energy poverty. In other words, does gender influence the likelihood of being in an energy poverty situation? And are the impacts of fuel poverty on an individual/household amplified by gender?

Physiological dimension

Women are more heat and cold sensitive than men due to their physiology (chronic temperature-related discomfort, heat, and associated diseases). Recent studies have noted that women are more sensitive to extreme temperatures, which may place women and girls suffering energy poverty at a greater risk. Age is also a significant factor in dealing with heat and cold stress, with young children and older people being particularly vulnerable. Additionally, a higher share of women makes up the population of older people due to longer life expectancy. Life expectancy at birth in the EU in 2018 was estimated to be 83.7 years for women and 78.2 years for men. Older women (65+) are more likely to be poorer than men if they are living alone (23% of older women, 18% of older men).

Disability and health status are also important physiological factors that aggravate vulnerability to energy poverty among women and several EU member states consider health and disability as key criteria for vulnerability. At the EU level, 22% of women with disabilities are at risk of poverty, compared to 20.8% of men with disabilities and 15.9% of women without disabilities. This also increases the likelihood of energy poverty.

Economic dimension

Women's disproportional vulnerability to energy poverty is linked with an array of economic factors, such as their disproportionate share in unpaid care work, the gender pay gap and gender pension gap. Women have lower wages and pensions than men; single-mother households do not have enough monetary resources to live with their child; women have associated child-care tasks that make them more vulnerable in terms of lower net income and less hours to work; and women live longer than men, so many one-person households are women living alone on a small pension. Younger mothers, women with young children and women caring for family members with disabilities are amongst the affected parent groups. These factors contribute to sensitivity to energy poverty.

Health dimension

Living in inadequately heated or cooled homes has detrimental implications on respiratory and cardiovascular systems, as well as on mental health and well-being. It may also particularly affect persons with disabilities who may also have health problems related or not to their disability. Several studies have already pointed out women's higher vulnerability to winter mortality. For populations that rely on solid fuels, for example in rural regions of Central and Eastern Europe, infections, respiratory and cardiovascular diseases, headaches, nausea, and dizziness can result from cooking with solid fuels, and there is even the risk of poisoning and death. Inadequately heated or cooled homes can also affect mental health as they cause increased stress, reduced well-being and comfort, and depression. One recent study from Barcelona (Spain) show that people affected by energy poverty have a significantly greater probability (2.2 to 5.3 times more than non-affected population) of poor self-perceived physical and mental health.

Regarding psychosocial well-being, another recent paper with sex-disaggregated data from the Barcelona Public Health Survey indicates that women affected by energy poverty in Barcelona report poor mental health 1.9 times more frequently than non-affected women while, in comparison, affected men report poor mental health 2.1 times more frequently than non-affected. It is therefore important to highlight the issue of psycho-social health, as
a higher share of women are at risk of poverty or social exclusion: stigmatisation and social isolation hinder normal everyday life, such as work or study, and decrease social relations.

Social and cultural dimension

Responsibilities and household roles are important social and cultural factors. The gendered division of labour generally assigns women the responsibility for the provision of household energy in relation to their spheres of influence in the household. Women do not have equal voices on policy, economy, and the household - even though laws foresee them. Analysis of visits in 100 households, affected by energy poverty in Albania shows that 60% of men had decision-making rights about household issues and only 40% of women. Another important social and cultural dimension is care work. The responsibility for dependent children and other (family) members in the household increases the unpaid care work of women. In fact, due to domestic household inequalities, gender is indicative of how families cope with energy poverty and also, in determining who bears with its emotional and physical consequences.

Current European Union policy developments in the intersection of gender and energy poverty

The recent 2021 report on gender equality in the EU highlights several ways the EU's gender and climate, energy or transport policies are connected. It claims that 'gender mainstreaming has helped increase women's representation in the European Green Deal', that the 'EU strategy on adaptation to climate change, [...] ensures that external adaptation actions are developed so as to effectively address the disproportionate impact climate change has on women, [...] and that the Sustainable and Smart Mobility Strategy, [...] put[s] forward commitments to address the gender segregation in transport sectors and increase the employment of women'.

However, a higher level of coherence between the gender equality and climate, energy or transport policies should be striven for.

It is important to highlight that currently, there are no policies or measures in the EU to directly address the nexus of gender and energy poverty. Although many Member States have put in place policies and measures to tackle energy poverty, evidence does not show a particular focus on gender. A recent analysis of financial support programs on energy poverty in Spain, France, Italy, Croatia, Slovenia, Germany, and Albania showed that although many financial support programmes at the local, national and EU-level aim to reduce energy poverty, there is no consideration of gender dimensions within the evaluated financial programs. While the significance of gender inequality in energy poverty has been partially recognised, it is underrepresented in the financial budgets of the support programs.

Likewise, the review of the European Green Deal (EGD) program for the purposes of this chapter shows that the EGD does not include policies, measures or actions to directly tackle the issue of enhanced vulnerability to energy poverty among women in all their diversity, although it does address the issue of energy poverty in general. The Renovation Wave strategy does recognise that 'increasing the presence and role of women in the construction sector can help improve the availability of skills and qualified professionals', yet it is estimated that the energy related aspects of EGD will have disproportionately more positive effects for men than for women affected by energy poverty, especially if we look at its efforts to boost renovation and renewables.

Starting from the gender gap in ownership of housing, it can be assessed that the Renovation Wave Strategy will bring more positive effects for men than for women, as men tend to be the owners of dwellings more often than women. As the Renovation wave will bring benefits mainly to the owners of the dwellings, women are less likely to directly benefit from this compared to men. Gender discrimination in housing tenure is still present today: although a majority of homeless people are men, women face more difficulties than men in occupying healthy and comfortable housing. This discrimination is primarily based on inequality in matters of salary and employment opportunity, notably full-time employment. Overall, women tend to be disadvantaged in terms of home tenure in European countries. Households headed by a man are more likely to own the home where they live as men are less likely to leave the workforce for childbearing and rearing, are more likely to maintain an income level and to secure a loan or mortgage.
Another relevant aspect to examine when addressing energy poverty is the aspect of job creation in the EGD as explained in chapter 6 of this report, especially in the sectors of renovation of buildings and renewable sources of energy, which are closest to the energy poverty issue. Because these sectors are traditionally male dominated, the benefits of job creation will be enjoyed mostly by men and only partially by women. Construction stands out as one of the most gendered-segregated and male-dominated sectors of the economy. As of 2016, construction was the largest industrial sector of the EU economy, accounting for 15 million workers - of which only 1.5 million were women and just 1% were young women. The small percentage of female workers in the building sector’s labour force tend to be placed in office roles, away from the trade labour, which severely restricts their ability to advance their careers. Gender stereotypes reinforce male dominance as the construction industry features a poor image of harsh, uncomfortable working conditions that require physical strength, long, inflexible working hours and a workplace culture characterised by ‘laddish’ behaviour, which in turns results in employers engaging in discriminatory hiring practices under the belief that women are unsuitable for construction work.

From a broader perspective, it is estimated that there is a high risk that renovation and renewables policies from the EGD will perpetuate gender discrimination. Namely, in terms of participation, the EGD is not bringing about this much-needed change. Especially from a gender perspective, but also including other intersectional aspects, if equal and inclusive participation is not ensured, there will be no major improvements in the institutional set up. The EGD, especially its renovation and renewables aspects, does not include the designs that are needed to implement change, hence the main sectors of the EGD, related to tackling energy poverty, are mainly bringing benefits for men and not women. Also, especially in the renovation and renewables sectors, the governance of the EGD will be conducted by the types of ministries of member states where the male role is still predominant, such as those in charge of economic affairs, construction, infrastructure or land planning. Overall, the energy sector is seen as being dominated by men aged 50 and above, with economists and engineers being the dominant professions. While not against gender equity, these professions often do not see the relevance of gender to their work.

From the perspective of equal representation, it is important that attention is paid not only to gender, but also to a broader intersectional perspective. Representation should be improved not by involving ‘just’ women, but by involving women who represent the diversity of the gender-energy poverty nexus. Without identifying manners to involve perspectives of gender and other intersectional aspects in energy related areas of the EGD, the EGD risks perpetuating male domination and lacks a focus on capacity building on the interface of gender and energy poverty.

What is estimated to also present a problem is that the issues that the EGD contains in terms of gender inequality, as described above, are likely to be ‘exported’ to non-EU countries too. For example, the Green Agenda for the Balkans is following the same direction as the EGD, so the same issues will be transferred to the Balkans and other non-EU countries affected by EU policies.

**Policy recommendations**

Energy policies have a history of being focused on supply of energy, not on consumption, and as a result, energy policies assume that women and men have the same needs, values, experiences and aspirations towards energy production and use. Energy poverty policies would need to consider the distinct gender and intersectional differences in the causes and effects of energy poverty, including issues related to the access to and control over energy in the context of energy poverty.

There are some gender mainstreaming methodologies which could be used to create gender-aware approaches to addressing energy poverty. Although these approaches need to be applied on a general level, here we are listing them as a way to make the EGD, especially its renovation and renewables aspects, more gender-sensitive in the context of energy poverty.

- **Raising awareness about gender/intersectional aspects and energy poverty:** There is a need to raise awareness about issues related to gender, as well as other social categories which are intersectional, and how they relate to energy poverty. There is a large deficit in awareness and capacity building - including enhancing expertise in this area – about gender
and energy poverty, especially among policy- and decision-makers. A gender-aware understanding of energy poverty needs to be developed, as well as the awareness that energy poverty is a gendered issue.

- **Energy poverty definition that takes gender and intersectional aspects into account:** There have been calls for a definition of energy poverty which covers the EU, but instead of trying to develop a pan-European definition of energy poverty, member states should develop their own national definitions with guidance at the European level on the factors that need to be considered. Such an approach would allow flexibility to reflect specific conditions. However, no matter which definition of energy poverty is finally decided upon, it needs to take an intersectional gendered approach into account. It could explicitly state that factors such as income, gender, race, ability and geographical location may influence a person’s vulnerability to energy poverty and should therefore be considered when applying solutions. In this framework, it would be important to conduct a gender analysis, which provides the necessary data and information to integrate a gender perspective into policies, programmes and projects and allows for the development of interventions that address gender inequalities and meet the different needs of women and men.

- **Collecting sex-disaggregated data with an intersectional perspective (race, age, class, ability...) on energy poverty:** In part, the lack of awareness is linked to the lack of data. Apart from scarce case studies and small samples, the EU does not have available data disaggregated by sex, age and disability related to energy use and specifically energy poverty. Absence of sex-disaggregated data is likely to reinforce existing inequalities and the vicious cycle between lack of data and no remedial action. Good data is the basis of policy making as well as allowing benchmarking and tracking progress. Given the importance of the Energy Poverty Observatory in promoting indicators to measure energy poverty in the EU, it would be appropriate for it to also promote analysis of sex-disaggregated data with an intersectional perspective.

- **Gender budgeting:** Gender budgeting can be used as a tool to make energy poverty policies gender-just, hence it should be applied more often to break down and identify the differentiated public revenue allocations and expenditures as they affect people in energy poverty.

- **Engendering energy poverty indicators:** In the light of the aforementioned gender analysis, the development of intersectional gender sensitive indicators of energy poverty would be an important step in informing energy poverty policies to be more gender-sensitive. It would also serve to design targets for action. The revision of National Energy and Climate Plans of the EU member states, which is due in 2024, could be a good occasion to provide these. Apart from these general steps to making energy poverty policies and measures more socially responsive and gender-just, we would like to propose several recommendations specifically related to the EGD, especially to its renovation and renewables components.

- **Involvement of women in all their diversity in the design of plans for operationalising the energy aspects of the EGD:** Although the key EGD energy related strategies are developed and some key flaws regarding gender/intersectionality are already integrated in them (see previous section), operationalisation of the energy aspects of the EGD can still fix some of these disparities for women in all their diversity, including those with disabilities. That is why it would be recommendable to ensure the relevant participation of women at all levels of designing operationalisation plans for the implementation of the EGD, especially its renovation and renewables aspects.

- **Prioritising women in training and jobs related to renovation and renewables:** How priority opportunities can be created for women to take an equal part in construction jobs, as well as in jobs related to deployment of renewable sources of energy should be considered. Also, in training and promoting skills and qualifications it should be examined carefully where priority can be given to the inclusion of women. The ongoing process of revision of the European Energy Efficiency Directive should be used as a good opportunity for including a strong gender dimension.
• Protecting women against rising rents or other costs due to renovation or deployment of renewables: Member States need to work out more detailed plans on how to ensure that rent and other housing related costs do not rise as a consequence of renovations, so that this burden does not disproportionately affect women. They should explore rent control mechanisms.

• Prioritising women in renovation and renewables deployment for people affected by energy poverty: Inclusion of people affected by energy poverty, in the renovation efforts and in deployment of renewables is already highlighted, but no specific focus is put on women. It is advisable to consider in the operationalisation of renovation and renewables strategies how women in all their diversity, affected by energy poverty, can be given priority.

Good practice example

Renewing energies: women leading the energy transition in Barcelona

The non-profit consultancy Ecoserveis, the Azimut 360 cooperative and the Welfare and Development Association work on the recently started ‘Renovando Energías’ (Renewing Energies) initiative, which is co-financed by the Barcelona City Council. The general objective of the project is the creation of an innovative employment plan and the promotion of energy education and a new energy culture, especially aimed at people in a situation of vulnerability to unemployment: women outside the area of formally paid work.

This project aims to train and promote the employment of women in a situation of vulnerability in a sector of growing demand in the city, to be able to deal with the oligopoly both from a domestic and city point of view. In order to promote energy communities (social and solidarity and not in the hands of the energy oligopoly), it is necessary to promote solidarity and cooperation between neighbours, to establish mechanisms for investment and community energy management. The main challenge to be addressed, once the legal, technical, and economic ones are tackled, remains community facilitation. For this reason, women will be trained to understand and defend their own energy rights and those of the communities they work with.

Unemployed women will receive training and do internships in companies that have detected the need for specialized community management for energy communities. Eleven women have already started the 100-hour training process on the conceptual, legal, financial and contextual framework of energy communities and other transversal skills. The objective is to test the new professional profile and promote the replicability of this model of involving women in the energy community sector, as companies in the energy community sector detect that there is a need for skills that promote neighbourhood participation in energy communities and manage possible conflict. Apart from that, the project also aims at reducing social inequalities and gender disparities among unemployed people.

2 Olgu Gizem Birgi et al., Gender and energy poverty - Facts and arguments, (2021)
4 Birgi et al., Gender and energy poverty - Facts and arguments
6 Birgi et al., Gender and energy poverty - Facts and arguments
8 Joy Clancy et al., Gender perspective on access to energy in the EU (Brussels: European Union, 2017)
9 European Institute for Gender Equality (EIGE), Gender equality and long-term care at home (Luxembourg: Publications Office of the European Union, 2020); European Institute for Gender Equality (EIGE), Gender Equality Index 2020: Key findings for the EU (2020)
10 Birgi et al., Gender and energy poverty - Facts and arguments; Clancy et al., Gender perspective on access to energy in the EU
11 European Institute for Gender Equality (EIGE), *Gender equality and long-term care at home*, European Institute for Gender Equality (EIGE), *Gender Equality Index 2020: Key findings for the EU*
12 Birgi et al., *Gender and energy poverty - Facts and arguments*
13 Birgi et al., *Gender and energy poverty - Facts and arguments*
14 Birgi et al., *Gender and energy poverty - Facts and arguments*
15 Juli Carrere et al., “Energy poverty, its intensity and health in vulnerable populations in a Southern European city”, *Gaceta Sanitaria* (2020)
17 Birgi et al., *Gender and energy poverty - Facts and arguments*
18 Struga et al., Analysis of the Household Survey (EmpowerMed, forthcoming in 2021)
19 Petrova and Simcock, “Gender and energy, domestic inequities reconsidered”
20 European Commission, *2021 report on gender equality in the EU*, 2021, European Union
26 Maikweyana Tapia et al., “Investigation of the Barriers and Their Overcoming Solutions to Women’s Involvement in the U.S. Construction Industry”, *ASCE*, Original publication November 9, 2020 (accessed May 21, 2021)
29 Gisela Geisler et al., *WID/Gender Units and the Experience of Gender Mainstreaming in Multi-Lateral Organisations: Knights on White Horses* (2020)
30 Habersbrunner and Martschew, *Report on gender aspects of existing financial schemes for energy poverty measures*
31 EU Energy Poverty Observatory (accessed May 21, 2021)
32 “Barcelona impulsa la participación de la mujer en la construcción de comunidades energéticas”, *Renewable energy magazine*, Original publication April 16, 2021 (accessed May 21, 2021); “RENEWING ENERGIES: women leading the energy transition”, *Ecoverso* (accessed May 21, 2021)
33 “Citizen energy community” means a legal entity that: (a) is based on voluntary and open participation and is effectively controlled by members or shareholders that are natural persons, local authorities, including municipalities, or small enterprises; (b) has for its primary purpose to provide environmental, economic or social community benefits to its members or shareholders or to the local areas where it operates rather than to generate financial profits; and (c) may engage in generation, including from renewable sources, distribution, supply, consumption, aggregation, energy storage, energy efficiency services or charging services for electric vehicles or provide other energy services to its members or shareholders.
SUSTAINABLE AND INCLUSIVE TRANSPORT SYSTEMS

By Tim Gore, Thorfinn Stainforth, and Antoine Lucic
SUSTAINABLE AND INCLUSIVE TRANSPORT SYSTEMS

Transforming transport is one of the most urgent priorities of the European Green Deal. Transport represents around a quarter of EU greenhouse gas emissions, and while emissions from the power sector are in structural decline, emissions from transport are still higher today than in 1990.1 But the sector is also a site of major inequalities. Transport is the most unequal form of carbon consumption by income,2 with the majority of the sector’s emissions driven by a small minority of the highest emitting EU citizens.3 It is the biggest driver of air pollution in cities, to which people with low incomes and from Black and minority ethnic communities are often disproportionately exposed.4 And critically for this gender analysis, transport systems in the EU are largely designed by and for abled men, reproducing forms of discrimination such as sexism, racism or ableism.

In this chapter we present evidence of gender inequality in the use of different types of transport, in the types of trips people make, in the experience of using transport and of employment in the transport sector. We then present an overview of the relevant legislative landscape under the Green Deal and recommendations to help build inclusive, gender-just and sustainable mobility systems in the EU.

Gendered analysis of transport systems in the EU

The International Transport Forum has concluded that “gender is one of the most defining determinants of transport choice”.5 Different mobility patterns between women and men explored in this chapter can be seen to reflect patriarchal structures which place greater responsibility for care work on women, while abled men generally have more cultural, and economic independence, as well as power over the design of mobility systems.
Transport modes

Research shows that women walk and use public transport (especially buses) more than men. Men on the other hand tend to fly, drive individual cars, cycle and use new mobility services like carsharing, ridesharing, bike sharing and e-scooters more than women, although there is evidence that when cycling infrastructure is safe, women and men cycle equally as often. Men are more likely to have a driver’s license and access to a car than women, while women are more likely to be a passenger than to drive themselves.

“If everyone travelled in the way women do today, the energy use and emissions from passenger transport in Sweden would decrease with almost 20 per cent. Furthermore, the use of the car as a mode of transport would already be on the level estimated to be sustainable for the year 2050,” Lena Smidfelt Rosqvist, Head of Research at Trivector.

Trips

Trip patterns are gendered, in part due to women’s lower participation in the labour market and higher involvement in unpaid care work. Women are more likely to make several, shorter trips while carrying groceries and/or accompanying children or older family members, while men are more likely to undertake individual trips commuting to and from a workplace. One estimate suggests more than 2/3 of trips made by men are for work, compared to only half of trips made by women, while almost 1/3 of trips made by women relate to household responsibilities compared to just 1/8 of trips by men.

These male trip patterns have to a large extent shaped transport policies and systems in the EU to date, which fail to address the needs for multiple, shorter trips in off-peak hours, accessible to people of all ages. For example, transport pricing structures do not always take trip-chaining into account, and public transport hubs and stations are not always designed for people traveling with children, prams and groceries or accompanying people with reduced mobility.
Experiences

Women and men experience and use transport modes differently. Men tend to be more dangerous drivers, causing a large majority of accidents to which women are disproportionately vulnerable. Safety considerations, notably in the use of public transportation, are often cited as limiting women's mobility, which in turn may impact women's access to opportunities (including education and jobs) and have repercussions for long-term wellbeing. Fear of harassment and assaults mean that women worry more than men about which routes to take and which time they travel.

For example, a survey by the French National Federation of Transport Users showed that 90% of women respondents had experienced sexual harassment while taking public transport. One study in the UK found that the number of public transport users would increase by 10 per cent if passengers, especially women, felt safer. The LGBTQI+ community is also vulnerable to violence and harassment worldwide but its particular security needs are largely ignored in transport policy and data collection.

Employment

Women make up 22% of the EU transport sector labour force. While this is the highest rate of female employees in the transport sector in the world, women are also impeded from rising to senior positions, so there are disproportionately few women in decision making roles, reinforcing gender bias in transport policy. Women predominantly work in customer-facing or administrative roles, often under more flexible work arrangements and in part-time jobs, and thus have less decision-making power or opportunities for promotion than male workers.

A 2019 survey by the European Transport Workers’ Federation (ETWF) of women transport workers across Europe found that a quarter thought that being a woman has a negative impact on their wages and nearly half said that their workplace does not prioritise a safe and adequate work environment for women, demonstrating that gender-based violence affects women transport workers as well as users. In a separate survey, a quarter of respondents said that violence against women is regular and considered it to be “part of the job.”

As a consequence of men's dominance among senior positions in the transport sector, many of the assumptions in planning and design may be male oriented. This may mean, for example, a greater emphasis on commuter traffic and transport systems designed for simple home to work trips, or car design using males as the “default” value, leading to increased chances of death for women in crashes. Attracting, retaining and increasing the representation of women at all levels in the transport workforce is therefore vital to building more gender-just and inclusive transport systems.

Gender and sustainable mobility in the European Green Deal

Addressing sustainability challenges in the transport sector is a key pillar of the European Green Deal. In this section we assess the extent to which gender is explicitly considered in current and upcoming EU mobility and related policy measures and make recommendations for a more gender-just and inclusive approach.

2.1 Gender, mobility and the European Green Deal

The European Commission (EC) presented the Sustainable and Smart Mobility Strategy in December 2020 as a European Green Deal flagship initiative, including the vital requirement that any future transport policy proposal should comply with the EC’s Gender Equality and Disability Strategies. But the Strategy is otherwise gender blind.

It aims inter alia to protect health and wellbeing while ensuring that the transition “should leave nobody behind,” but its commitment to the principle “that mobility is available and affordable for all” refers explicitly only to “rural and remote regions” and to “persons with reduced mobility and persons with disabilities,” making no reference to gender. With regard to safety issues, the Strategy fails to recognise women’s disproportionate representation among road traffic victims, and even more concerning, makes no reference to the grave safety issues reported extensively by women with regard to primarily male violence and harassment as users of and workers in transport systems.
The only other explicit reference to gender in the Strategy relates to employment in the transport sector, in relation to continued support to stakeholder cooperation and exchange of good practices on the “More Women in Transport – Platform for Change,” established in 2017 to increase the number of women in transport professions. This initiative has led to 19 “actions” so far, ranging from conferences, seminars, and training to the implementation of new action plans and advisory bodies in some participating organisations.

Furthermore, the EU’s most important legislative initiatives in the area of sustainable mobility, including the CO2 Standards for Cars Regulation, Fuel Quality Directive, Eurovignette Directive and the Trans-European Transport Network, have no explicit recognition of gender whatsoever.

The one area in which gender dimensions of mobility have been explicitly addressed by the EC is the 2020 Sustainable Urban Mobility Plan (SUMPs) topic guide - “Addressing gender equity and vulnerable groups in SUMPs” – designed to reflect the EC’s commitment to integrating gender issues across its policy initiatives. SUMPs are the central element of the EC’s 2013 Urban Mobility Package, and likely to continue as a critical element in sustainable urban transport policy at the EU level following a positive evaluation in 2021.

Towards gender justice in EU mobility policy

Here we present four priority areas to strengthen the integration of a gendered analysis into the Sustainable and Smart Mobility Strategy, alongside efforts to address the root causes of patriarchy and gender inequality explored in other chapters of this report.

- **Investing in gender disaggregated data collection and intersectional analysis**
  Both the EC and the Court of Auditors have noted that there is a lack of systematically collected, gender-disaggregated and comparable data at city level in the EU, and currently there is no legal requirement for Member States to report data on urban mobility to the EC.

  The EC should insist on Member State collection of intersectional gender-disaggregated data on urban mobility as a first priority, as a precondition for more gender-just policy-making and fund research that makes use of this new data.

- **From private cars to safe and accessible public and non-motorised travel**
  EU policy continues to prioritise the transition towards zero and low-emission vehicles over other sustainable transport options, which, given the disproportionate use of cars by men, represents a continued bias towards male mobility priorities.

  The EU and Member States should shift tax incentives and public investment from the promotion of private transport towards flexible, affordable, secure public transport. Building off-peak capacity, reliability and flexibility of service and ticketing should be a central goal to better accommodate the needs of women and those with mobility challenges. Investment should also be scaled-up for building safe and accessible cycle and walking infrastructure.

- **Addressing gender bias in the design of autonomous cars**
  Serious concerns have been raised that autonomous cars are being coded with sexist or racist driving patterns as a baseline. Such questions require transparency around the algorithms guiding a car (and other transport systems and technologies) and should be addressed under the relevant Directives governing intelligent transport systems.

- **Prioritising safe and accessible rail over aviation**
  In terms of inter-city travel, the aviation industry benefits from a large number of tax breaks compared to rail and bus sectors, despite the fact that this overwhelmingly benefits male, affluent consumers.

  The EU and Member States should drop tax breaks for aviation fuels, the VAT exemption for flights, and stop public investment in airports for inter-city travel. Safe, reliable, accessible, and flexible inter-city options by rail and bus should be promoted, with the safety and comfort of women given priority attention to ensure that women feel safe to choose this option.
5 International Transport Forum, “Gender is One of the Most Robust Determinants of Transport Choice”, *Transport Policy Matter*, Original publication February 6, 2020 (accessed May 6, 2021)
7 Ramboll, *Gender and (Smart) Mobility: Green Paper 2021* (2021)
9 Ramboll, *Gender and (Smart) Mobility*
11 UN Women, ed., *Women’s access to safe transport* (2020)
12 British Transport Authority, *Fear of Crime and Concerns about Personal safety on the rail network: Summary of findings from existing research: 2008 update*. 16
15 "Making the Transport Sector Fit for Women to Work in", *European Transport Workers’ Federation (ETF)* (accessed May 16, 2021)
18 Wei-Shiuen Ng and Ashley Acker, *The Gender Dimension of the Transport Workforce* (OECD/ITF, 2020)
23 European Commission, *COMMISSION STAFF WORKING DOCUMENT EVALUATION of the 2013 Urban Mobility Package*
24 European Court of Auditors, *Sustainable Urban Mobility in the EU: No substantial improvement is possible without Member States’ commitment* (2020)
25 Lance Elliot, “Here’s Why The AI At The Wheel Of A Self-Driving Car Might Be Male, Female, Gender-Fluid, Or Gender-Neutral”, Forbes, Original publication February 22, 2020 (accessed May 18, 2021)
THE ROLE OF WOMEN AS SUSTAINABLE FOOD PRODUCERS IN RURAL COMMUNITIES

By Sally Shortall
THE ROLE OF WOMEN AS SUSTAINABLE FOOD PRODUCERS IN RURAL COMMUNITIES.

Introduction

The Green Deal and Farms: A healthier and more sustainable European Union (EU) food system is a cornerstone of the European Green Deal. The Farm to Fork Strategy is at the heart of the Deal aiming to make food systems fair, healthy, and environmentally friendly. It recognises that the transition must be supported by a Common Agricultural Policy (CAP) that supports the ambitions of the Green Deal.

The Green Deal is a positive development. However, like the CAP it focuses on land use and the environmental impact without considering the people who use land. Men and women farm differently. This is not acknowledged by the Green Deal which limits its potential as a policy. This chapter begins with an overview of gender mainstreaming and the CAP. It then presents evidence from two recent studies to show that women do farm differently, they are more committed to regenerative farming, organic farming, animal welfare and they have a greater understanding of farm to fork systems. The agricultural industry is notoriously lacking in diversity, slow to change practice, and women bring fresh perspectives. Finally, some recommendations are made regarding EU policy development and Member State practice.

Gender mainstreaming

Gender mainstreaming is seen as the most progressive way to approach gender equality and it is believed to have the capacity to be transformative. Gender mainstreaming shifts the focus from seeing men as the norm and proposing special measures and actions targeted at women to instead examining the organisational practices, processes and norms that
generate inequalities. The intention is to make visible the gendered nature of organisational assumptions and processes and by doing this, to eliminate gender biases in how policy operates. There are numerous tools that must be adopted to achieve gender mainstreaming. The European Institute for Gender Equality’s (EIGE) website provides a comprehensive guide to the tools that are necessary to facilitate successful gender mainstreaming. First, comprehensive training of policy makers is required in order to train policy makers to think with a gendered lens. Gender Impact Assessments are important, because they help identify the gender equality objectives and the policies that will achieve these objectives. These tools require robust baseline information to be gathered, monitored, and evaluated against clear goals of change. Gender budgeting is promoted as a tool of best practice: it promotes equality through fiscal policy by re-orienting the allocation of public resources if gender discrepancy is identified. Both EU institutions and gender experts are critical of how effectively gender mainstreaming is implemented. The tools advocated by EIGE are rarely adopted. One stumbling block for gender mainstreaming is that it has not problematised the relationship between ‘gender’ and the ‘mainstream’ and has instead tended to present the two concepts as if they exist in tandem without any tensions. The dual (equal) agenda is business needs and feminist goals. This presumption has been shown to be deeply problematic. This is particularly true when we turn to agriculture, where the success of many farms businesses rely on the unpaid labour of women spouses and family members.

**The Common Agriculture Policy (CAP)**

The original aim of the CAP was to guarantee a minimum living wage to European farmers and to guarantee food supply and security. It is a complex and controversial policy, and it has been revised over the years to adapt to new realities and unforeseen negative impacts such as over production, environmental degradation, and inequalities between types of farming and regions in the EU. It has also been criticised for being overly expensive and successive reforms have tried to correct that. It remains the most expensive component of the EU common budget at 37.4% in 2019, with persistent inequalities. 80% of direct payments go to 20% of farmers. The future CAP reforms are particularly relevant to transition towards a sustainable food system as announced by the Green Deal and its accompanying Farm to Fork Strategy. The so called “new delivery model” has the potential to reform our food systems. For this to be successful, it is important that Member States are accountable for achieving the Farm to Fork objectives.

Farming is an unusual occupation in that it remains a predominantly family business. 95% of European farms are family businesses, defined as ‘an agricultural holding which is managed and operated by a household and where farm labour is largely supplied by that household’. Research has long shown the interdependence of family and farm, and the normative assumption is that this is a heterosexual unit. There is little research on same sex farming couples although some recent tentative research found that the most gender equal relationships were within same sex households. Family members, men and women, are active participants in strategies to ensure the future of the family farm.

There is a very poor understanding of women’s role in European agriculture; as decision makers, unpaid labourers, and investors in the farm through off-farm income. At the EU level, agricultural data presumes an individual holder/owner/manager and does not allow any understanding of the role women, and other unpaid workers, play in shaping decisions on the farms. When women own land they tend to be smaller holdings.

Regarding gender mainstreaming, the CAP policies are at best gender blind and possibly gender biased. It does not consider if women and men farm differently or if policies reinforce existing inequalities. The EU Gender Equality Strategy (2020) calls on all gender stereotypes to be challenged. Yet many documents relating to the administering of the CAP perpetuate a stereotype of agriculture as a singular individual activity, rather than a family occupation. They also perpetuate the idea that the individual involved is a man. Cultural norms and gender stereotypes are not questioned, rather they are reinforced in EU documents and legislation relating to agriculture. EIGE refer to a general backlash against gender equality in the EU. This is evident in the CAP; the Regulation 2007-13 stated a commitment to promote equality between men and women. There was no such statement in the last Regulation.

The EU then has little knowledge of the role of women on farms, if they farm differently, or if they follow the types of practices advocated and encouraged by the Green Deal. This chapter turns now to two recent pieces of research that highlight women’s approaches to
Findings: women as producers and consumers of sustainable food systems

Organic farming and farm to fork strategies

While the overall gender-disaggregated data on gender and organic farming is poor, what exists suggests it might have a better gender balance than conventional farming. Research has shown that organic farmers are more environmentally aware, younger, better educated, and more likely to be women than conventional farmers. Data from 2013 noted that 2% of farmers in the EU were organic and of these 24% were women, and they occupied 13% of the land devoted to organic farming.

An employee of the Irish Organics Association was interviewed for the EU study. This person reported a greater presence of women in organics; while 12% of women in Ireland are farmers, 26% of organic licence holders are women, indicating that women are more likely to engage in organic production. However, women’s role in driving change as the spouses of farmers was also underlined:

‘On the packaging it is always the man who is actually the image on the front, but when I’ve spoken to them, it’s definitely the women driving the fact that it is an added value, and they are bringing that kind of common-sense thing’.

The interviewee said that women have a different approach to the market, ‘the key difference to me is where women are involved it’s very much more about producing for a market as opposed to producing the food and then trying to find a market. This is the key difference and that’s why women are successful at it’.

This supply chain approach, reacting to the demands of the market, is the preferred model of the EU.

The Spanish Farm Women’s Network also reported that many of their members are engaged in organic production and choose to overcome the ‘middle-man’ to engage in short food chains, since their plots of land are small and selling directly to the consumer is the only way to make a profit.

Regenerative farming and animal welfare

In general, most of the women interviewed in England were very favourable toward and committed to, regenerative farming. Several women were motivated by the ideological position of environmental welfare. The majority were initially motivated by the fact that it was a more financially lucrative model of farming, and along the way also became ideologically committed to the idea of environmental well-being. Their husbands did too, although the women initially drove the conversion. Some new entrant women had smaller holdings and saw it as a model that would work for their size of farm.

The women who began from an ideological position had alternative sources of income. Julia said:

‘I didn’t want to feed my children the meat that we were able to purchase. We had a friend whose animals work hormone injectors on their neck constantly and it was not what I wanted to feed my children. We took a leap of faith and I started to grow our own meat, we had ducks, chickens, heifers’.

Julia was motivated by the dietary welfare of her children. She is a doctor by training and concerned about nutrition.
Most women who had pushed a regenerative model of farming did so because the farm had previously been losing money and this offered a more lucrative business approach. For example, Laura explained that the profit on their herd of 800 sheep had been negligible. She recognised that if they reduced their herd numbers and their inputs such as reducing the amount of concentrates they bought, their profit margin would increase. She had no farming background and had to persuade her husband. Incentives to make the conversion were important. Laura was helped by the Limestone Country Breed Project.

New entrant women recognised that regenerative farming suited their smaller size of holding. Paula said that having a small amount of land required her to have high value animals and reduce costs on inputs.

One interviewee also said that during the process of soil restoration that farmers would lose money. She suggested that some kind of conversion payment could incentivise farmers to adapt, offering a similar incentive to the one that had been provided for organics.

The ‘macho’ culture of farming was identified as a barrier to regenerative farming. An agricultural valuer said:

‘It is the “my tractor is bigger than yours” mentality. It is about having big kit. It is about the “pub yield” where farmers lie about their bumper harvest. This works against reducing the size of your herd or your inputs’.

Many women also spoke about the difficulties getting men to change their mindset. The ‘cultural constraints’ came up time and again; farmers are handed a model of farming intergenerationally and find it hard to break with this tradition and are under peer-pressure not to do so.

Conclusions and Recommendations

Women bring fresh perspectives to farm businesses. Often women ‘marrying in’ are innovative and entrepreneurial. There is evidence that women pursue organic production, regenerative farming, are market orientated and sell directly, and are committed to animal welfare.

Recommendations: EU

- Research should be funded to understand women’s farming practices at an EU level.
- Farming organisations consulted on the Green Deal must include a range of organisations including women producers, as engaging with women producers will make it easier to achieve the objectives of the Green Deal.
- The incentives through the CAP need to include provisions for smaller grant and loan applications, as this can facilitate access for various groups, including small NGOs or women farmers.
- The typical EU approach of assuming an individual male farmer must cease and a more gender-sensitive approach must be adopted.
- Gender mainstreaming in the CAP has proved to be ineffective. Targeting incentives directly at women and new entrants to the industry are likely to be more successful.
- Organise events to showcase women’s land use practices and challenge gender norms.
- The new Performance Monitoring and Evaluation Framework of the CAP must consider gender equality. Member States must provide gender disaggregated data on CAP support recipients.

Recommendations: Member States

- In the CAP strategic Plans that they are currently drafting, Member States should address specifically the role of women in agriculture. This would also allow for more tailored policy, given that women’s participation in agricultural activities are very different from country to country.
- Member States must establish a national target for new women entrants in the agricultural sector.
- The monitoring committee of the CAP Strategic Plan must be gender-balanced.
- CAP negotiations must include diverse farming organisations that represent women.
Incentives and training around Green Deal objectives must be targeted at women family members as well as the registered holder.
IMPLEMENTING GENDERED POLICIES FOR A TOXIC-FREE ENVIRONMENT
GENDE AND CHEMICALS: ELIMINATING HAZARDOUS CHEMICALS FROM OUR ENVIRONMENTS

By Dolores Romano, Elise Vitali and Elisabeth Ruffinengo
**Dolores Romano** – I am a deputy manager on chemicals at the European Environmental Bureau. I have worked on chemical risk prevention policies in the last 30 years for several NGOs, trade union institutes and public authorities. I have participated in National, European and International expert groups and has published over a hundred reports and papers on the issue.

**Elise Vitali** – I am a policy officer on chemicals at the EEB. I work on policies and regulation of chemicals at European level to protect the environment, populations, and detoxify the circular economy. As an environmental law graduate from the University of Strasbourg, I specialised in international and European law. My academic research was published online by the Société Française de Droit de l’Environnement.

**Elisabeth Ruffinengo** – I am a health and environment advocacy manager for Wecf France. I hold a LLM in international and European public law and has been engaged in environmental health for 15 years, with a focus on preventing exposure to chemicals of concern and other kinds of pollutions and protect populations from their adverse health effects.

The European Environmental Bureau (EEB) is Europe’s largest network of environmental citizens’ organisations. We bring together over 170 civil society organisations from more than 35 European countries. We stand for sustainable development, environmental justice & participatory democracy.

Women Engage for a Common Future (WECF) is a network of 150 women’s and environmental organisations in 50 countries. For 25 years, WECF aimed at strengthening female leadership and gender equality in the field of sustainability. We do this by working on three key areas: sustainable development, climate and environmental action and a non-toxic society, always from a feminist perspective. With our activities aimed at capacity building, influencing policy and raising awareness, we strengthen the position of womxn worldwide.

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**GENDER AND CHEMICALS:**

**ELIMINATING HAZARDOUS CHEMICALS FROM OUR ENVIRONMENTS**

**Disclaimer:** This chapter discusses the differentiated effects of chemical exposure on bodies with female versus male anatomy. When using terms e.g., ‘women’, it should be noted that this describes those with female anatomy because there is a lack of data regarding trans and intersex people in the European Union. We recognise this gap in the research and in using the terms women, men, female, male we make no assumption about the gender identity of individuals and place no normative assumptions on bodies.
Gender and vulnerability to chemicals

More than 1.5 million people die from exposure to harmful chemicals every year worldwide according to The World Health Organisation (WHO). Due to socio-economic, occupational, biological, and other factors, women suffer a greater health toll from chemicals than men. In European health and environmental policies these differences are generally not sufficiently considered when assessing the risks of chemicals and authorising their use on the European market.

Women’s health is differently impacted by chemicals

Physiological, anatomic, and other biologic differences influence susceptibility to chemicals. For example, different body composition results in a higher capacity of women to accumulate toxic chemicals as women have higher average body fat percentage than men. Women and men have different metabolism and intestinal microbiota and therefore, different capacities to absorb and metabolise chemicals. Differences in reproductive, cardiovascular, and nervous systems result in different health impacts from exposure to chemicals and impacts at different doses. Different hormone systems with higher levels of oestrogens result in higher susceptibility to exposure to xeno-oestrogens such as plastic ingredients and pesticides. Increased concentrations of natural and synthetic oestrogens are related to breast cancer, endometriosis, and other diseases of the reproductive system. Women experience higher prevalence of disorders such as anaemia and iron deficits, which range between 9% in young women and 70% in adult women, while only 2% of men are affected. Chronic deficiency in iron increases absorption of toxic metals such as lead, cadmium, and mercury. The prevalence of autoimmune diseases and fibromyalgia, related to exposure to environmental pollutants and occupational exposure to chemicals is also much higher in women than in men.1

During pregnancy, postpartum and lactation many important physiological and anatomical changes occur in women’s bodies that affect women’s exposure to chemicals.2 For example, to provide for the demands of the baby, increased inhalation and demand of water and nutrients may increase the woman’s intake of environmental and food pollutants. Metabolic changes experienced during maternity impact the distribution and metabolism of chemicals and may increase internal concentrations of pollutants and therefore the risks posed by hazardous chemicals.

Social factors and gender roles resulting in different health impacts

Many social factors result in a differentiated exposure of women and men to chemicals. Differentiated occupations result in differentiated exposures to hazardous chemicals. Examples of feminised sectors1 with high exposure to chemicals include personal care workers, cleaners, health professionals or cashiers (bisphenols form tickets). Many of these sectors also employ a higher proportion of Black women and women of colour, who may be more exposed to hazardous chemicals. For example, data from 2018 identified 60 substances of very high concern (CMR substances, sensitisers, potential endocrine disruptors) among 700 compounds found in the workplace of nail care professionals.3 These chemicals can be linked to dermatitis, asthma, headaches, or musculo-skeletal disorders in women who make up the vast majority of workers in this sector. Regular users at home should also be careful. Exposure at home and lifestyle adds to exposure during working shifts, resulting in double exposures. Due to the distribution of roles in society, women are more susceptible than men to be exposed at home to chemicals of concern contained in consumer products, since they most often take care of housework such as cleaning and cooking in heterosexual relationships. In a European Union (EU) member state such as France, women still carry out 72% of the housework.4

Cleaning products are one of the main product categories which exposes women to toxic chemicals at home, with potential adverse health effects at short or long term. The European Community Respiratory Health Survey7 conducted in 9 EU countries explored the
long-term consequences of the use of cleaning products. 85% of the 3,298 women taking part in the survey were in charge of cleaning at home, vs 46% of men surveyed. Women using cleaning products at home, or professional cleaners appear to suffer more frequently from asthma, and to have an accelerated decline in lung function.

Pesticides are another common source of exposure of women to toxic chemicals, whether in food or indoor/outdoor air. Data from the French national cohort study on pregnant women and newborns8 show an important contamination of pregnant women by pyrethroids, a category of pesticides used at home - with pesticides use, living near arable fields, alcohol or fish consumption identified as main sources. It is not surprising that endocrine disruptors, reprotoxic, persistent, carcinogenic substances, and other chemicals of concern have been found in the 4,145 women participants. Another recent study9 on more than 13,000 women found a correlation between consumption of food containing 25 active substances commonly used in pesticides in the EU (chlorpyrifos, imazalil, malathion, thiabendazole), and postmenopausal breast cancer, especially for overweight and obese women.

Cosmetics are a direct and daily source of exposure of women to chemicals of (potential) concern, with a woman using an average of 16 different cosmetics per day, even at a young age, due to the beauty ideal within our culture that reinforces stereotyped cis white young female role models. In 2017, a study conducted in Germany10 showed that 85 % of adolescents and young adults use cosmetic products in order to feel more confident. Cosmetic products can contain endocrine disruptors, allergens, etc. Some families of ingredients are known for their adverse effects: parabens, isothiazolinones, phthalates, benzophenones, etc. While the EU cosmetic regulation bans or limits the concentration of a huge number of ingredients of concern, other ingredients of potential concern remain authorised on the market. This is the case for hair dyes. Globally, permanent, or semi-permanent hair dyes have been linked with an increased risk of some cancers, with higher risks for products marketed at Black women in the US11 – but the regulation of hair dyes within the EU bans a number of problematic substances (180 banned between 2003 and 2016). 70 to 80% of hair dyes in the EU are permanent or semi-permanent.12 Ingredients of concern, such as resorcinol, an endocrine disruptor, and allergic ingredients, are still widely used in these products. Another cosmetic product category of specific concern is skin lightening products, which account for more than 26% of violations of the EU cosmetics regulation in RAPEX (EU rapid alert system for dangerous non-food products) for the period 2005-2018.13 Presence of hydroquinone, mercury or clobetasol propionate were the causes for these violations. This is analysed in Chapter 17 of this report.

It is now recognized that socio-economic status is an important determinant of health.14 Exposure to chemicals of concern, as well as other exposures with impacts on human health, prevail more among populations and individuals with a lower socioeconomic level. And in 2016, women have been identified as one of the groups with a greater risk of poverty or social exclusion than other members of the EU-28 population.15 A 2018 Eurostat report noted that women aged 18 and over were more at risk from poverty or social exclusion than men (24.3 % compared with 22.4 % in 2016).

Existing risks for women's health may be numerous, with lots of unknowns, such as for instance that of exposure to nanomaterials for female reproductive health. A recent study commissioned by the EU Observatory on Nanomaterials16 pointed out a lack of data on nanomaterials' impacts on female fertility, leading to uncertainties around the potential toxic effects of nanomaterials, over multiple generations, due to first warnings on some nanomaterials' developmental toxicity, ability to cross the placental barrier and reach the developing foetus, or affect critical organ systems.

Medication, especially during pregnancy, can be a risk factor exposure for women which can have long-term negative consequences on the future child. A number of scandals such as DES (diethylstilbestrol), thalidomide, or more recently Depakine and similar medication containing sodium valproate, shows that risks of medication consumption during pregnancy are not sufficiently taken into account. This may be due to the fact that medication assessment does not sufficiently include a gender dimension and has historically considered adverse effects on men's health rather than women's health.

Sex and gender aspects are also widely ignored by toxicological and epidemiological studies as results from an interdisciplinary systematic review17 by a network on sex/gender in environmental health has demonstrated. In order to ensure the protection of women from the risks posed by hazardous chemicals, toxicological studies should be designed and conducted for all sexes and genders,18 and endpoints and exposure should include gender considerations.
Gender-blind EU chemical policies

Despite the evidence on the differences regarding vulnerability to hazardous chemicals, EU policies aimed to protect people from the risks posed by hazardous chemicals remain gender blind.

Gender-blind chemical policies: REACH and CLP

In the EU, the Regulation on Classification, Labelling and Packaging (the CLP Regulation) and the Regulation concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH Regulation) are key instruments to regulate industrial chemicals. A main goal of both the REACH and the CLP Regulations is to ensure a high level of protection of human health and the environment.

REACH Regulation only mentions women once in its legal text (Art 1.4.1) when it clarifies that it may be necessary to identify different thresholds (Derived Non Effect Levels - DNEL) “for certain vulnerable sub-populations (e.g. children, pregnant women)”.

The CLP Regulation mentions women only in Art 3.7.1. when addressing adverse effects on development of the offspring and the need to provide a hazard warning for pregnant women, and for men and women of reproductive capacity and also when addressing concerns for breastfed babies.

The intention of both regulations is to protect the unborn child and breastfed babies, not to address women’s specific vulnerability to hazardous chemicals, not even during pregnancy or to address gender differences in exposure to chemicals. The words “gender”, “woman”, “girl” cannot be found in either of the legal texts. The word “female” is found when referring to laboratory animal testing. These regulations reify sexist stereotypes as they are only considering women’s role in society as maternal and ignore all other risk factors.

Gender-blind European Green Deal

Considering that the chemicals regulations are gender-blind, the accompanying policies do not make up for this flaw, nor is there any commitment to address the issue in the recently adopted health and environmental related policies of the EU under the European Green Deal.

The Chemical Strategy for Sustainability Towards a Toxic-Free Environment includes the Green Deal commitments to address human and environmental impacts of hazardous chemicals and includes an action plan with 70 measures. None of these actions address specific gender issues. However, the Strategy’s text does widen the concept of what it considers vulnerable populations to “those populations more vulnerable to chemicals exposure” therefore opening the scope to address gender issues, although the only mentions of women refer, once more, to “pregnant and nursing women as typical examples of vulnerable populations (footnote 15).

Recommendations

European Commission and Member States

- Include gender considerations in all policies and regulations addressing the risks posed by chemicals, including those dealing with workers’ protection. This should start by including gender considerations in the upcoming CLP and REACH revisions.
- Review guidance on risk assessment of chemicals for human health to ensure gender considerations are taken into account.
- Address lack of gender-differentiated data by improving the generation of disaggregated sex and gender data, including transgendered people, and ensuring they are duly taken into account at policy development stage.

Academia

- Ensure that biomonitoring, toxicological, epidemiological and public health studies are conducted for men, women, non-binary and other queer groups and corresponding endpoints and cover gender exposure considerations.
CSOs

- Environmental organizations working towards the protection of people and the environment from hazardous chemicals and organisations working on gender policies should work together on the topic.

4 Job still split along gender lines, Eurostat, Original publication March 7, 2018 (accessed May, 2021)
5 ANSES, OPINION of the French Agency for Food, Environmental and Occupational Health & Safety on the risk assessment of occupational exposure to products used for nail care and decoration (Maison-Alfort, 2017)
6 Dominique Joseph and Olga Trostiansky, Crise sanitaire et inégalités de genre (CESE, 2021)
7 Øistein Svanes et al., "Cleaning at Home and at Work in Relation to Lung Function Decline and Airway Obstruction", Am J Respir Crit Care Med, Vol. 197, no.9 (2018):1157-63
8 "Environment", Efe (accessed June 15, 2021)
9 "Certains cocktails de pesticides favoriseraient le risque de cancer du sein chez les femmes ménopausées", Inserm, Original publication March 15, 2021 (accessed June 15, 2021)
10 "The makeup craze reaches young German women", Premium beauty news, Original publication April 25, 2017 (accessed June 15, 2021)
11 "Hair Dyes And Straighteners Linked To Higher Cancer Risk, Especially For Black Women", NPR, Original publication December 4, 2019 (accessed June 15, 2021)
12 The EU is the safest market in the world for hair dyes, DG Health & Safety, European Commission, February 2016
16 "Female fertility data lacking for nanomaterials", European Union Observatory for Nanomaterials (EUON) (accessed June 15, 2021)
18 Jeongeun Im et al., “Sex and Gender Analysis of Toxicity and Epidemiology Data on Environmental Chemicals in the Three Major Toxicology Databases”, Journal of Women's Health, Vol. 29, no. 10 (2020)
FIGHTING MENSTRUAL PRECARITY, TOXIC PRODUCTS, RISKS AND WASTE

By Chantal Van den Bossche and Helen Lynn
Introduction

If there is one issue which can be found at the intersection of health, environment (waste) and feminist empowerment it is the topic of menstruation. But among both the public and policymakers, little attention is still being paid to the environmental and health problems associated with our periods. There is a great lack of knowledge on the subject of menstruation itself. At home, but also at school, little or no information is taught about the menstrual cycle. Our modern, fast-paced life is completely out of tune with our menstruation: if you are in physical pain, you are expected to take a painkiller and not complain. Women still grow up learning that menstrual pain is to be kept private and are afraid of being perceived as not fit for the working world if speaking about it.

Menstrual Health

The right to adequate menstrual health is fundamental and is important for women’s health and well-being. Menstruation is part of life. It is part of female fertility. While a first menstruation is celebrated in some cultures, in many others it starts with misery, pain and, most of all, shame.
Recently a new definition has been drafted for menstrual health: “a state of complete physical, mental, and social well-being and not merely the absence of disease or infirmity, in relation to the menstrual cycle. Achieving menstrual health implies that women, girls, and all other people who experience a menstrual cycle, throughout their life-course, are able to: access accurate information, the care their bodies need during and around menstruation including privacy, sanitation facilities and medical care, experience a positive and respectful environment in which to menstruate free of stigma and access to safe and affordable menstrual products.”

Although the definition mentions access to ‘safe’ products it does not define what these are and therefore, in our view, fails to address the issue of harmful chemicals in period products.

**Menstrual taboos**

Historically menstrual blood has been viewed as ‘other’, somehow different to the blood we bleed if we cut our skin, unclean, contaminated and somehow ‘dirty’. This view results in taboos around menstruation and the need for secrecy, conditioning us to think menstruation must remain hidden. This is at odds with what menstruation is all about, life itself. The language used around menstruation and the words we have for our period mean that terms such as feminine hygiene and sanitary products have become the norm. But there is nothing particularly feminine about hygiene or sanitation.

The Absorbent Hygiene Manufacturers (as they are commonly known) will be referred to as the Period Products Manufacturers (PPMs) have been quick to reinforce and capitalise on menstrual taboos and have done nothing until recently to dispel this myth. Instead, they have been reinforcing the secrecy with smaller and smaller products, wrapped in colourful individual plastic wrappers and producing decades of advertising using words like ‘fresh’ and ‘clean’. PPMs argue they are responding to consumer attitudes, while their advertising campaigns have been part of shaping these attitudes. The recent appropriation by the PPMs of the period-positive messages from activists and campaigners can be interpreted as a simple strategy to ensure continued profit-making by controlling how women and people who menstruate feel about their periods.

After decades of blue blood in adverts, the menstrual product manufacturers are now making fun of those adverts in order to sell us their products. Women and girls are shown as powerful protagonists, strong and in control not only because they are menstruating but also because they are wearing the brand’s product. But in co-opting feminist discourses and the energies of menstrual activism they seek to rebrand their own previous sexist advertising.

**Flush and forget - The growing mountain of waste**

The taboo on menstruation has a huge impact on the products we use, how we use them and, above all, how we dispose of them. We use fragrant plastic bags to hide used tampons or even worse, we flush them down the toilet for lack of a waste bin, being coerced to make unsustainable choices. We close our eyes to the bad sides of menstrual products; the enormous mountain of waste, the clogged sewers, the period pads washed up on our beaches and the fact that menstrual products are often not good for our health.

Regular, non-organic menstrual products create a lot of waste. The average person who menstruates produces 90kg of waste from menstrual pads, and 60 kg of waste from tampons during a lifetime. It takes over a hundred years for a menstrual pad or tampon applicator to break down. One regular pad can contain up to 90% plastic. This plastic ends up in landfills, in the sea, in our rivers and on our beaches. The use of regular non-organic disposable products is therefore a very unsustainable activity that generates hundreds of kgs of non-recyclable waste per person. But for many people it is not possible to use alternatives such as menstrual cups or organic compostable products because of lack of awareness and access, lack of sanitary facilities or affordability. If no regulatory or legislative measures are taken, the production of disposable menstrual products will only increase in the coming years with scientific research showing that girls are getting their periods at a younger age.
The true cost of menstruating

Women and people who menstruate use on average 11,000 disposable menstrual products in their lifetime based on 38 years of menstruating. Using reusables such as menstrual cups instead of tampons or pads, would result in annual savings of €18 to €119 per person while lifetime savings could exceed €4,400.8,9 Governments, too, could save a lot of money with waste disposal, if policies and regulations would encourage and support the use of sustainable alternatives.

To map the waste mountain created by pads, tampons, incontinence pads and wet wipes, the global network Break Free from Plastic, in collaboration with various partners, investigated the impact of disposable sanitary products10 on the growing waste mountain across Europe in 2019. Comparative studies in 28 EU Member States, found that more than 49 billion units of menstrual and sanitary products were used, equivalent to an annual production of about 590,000 tonnes of waste.11 Disposable menstrual products also have serious consequences throughout their life cycle, from the production stage to the end of life:

- The effects generated during the production process of these products are mainly due to the use of large quantities of wood pulp, cotton or viscose rayon and other components such as polyester, polyethylene, super absorbent polymers (SAP), polypropylene, adhesives, fragrances, and dyes. In addition, significant amounts of water and energy are used in the production process.
- Disposable sanitary products contribute significantly to global warming. It is estimated that these products emit about 3.3 tonnes of CO₂ throughout their life cycle, including production and transport, whilst incontinence and menstrual products emit about 245,000 tonnes of CO₂ per year.
Recycling is difficult and expensive due to the composition of products made from mixed materials and the presence of organic material after use. This is why in Europe, these products usually end up in landfills (87%) or are incinerated (13%), wasting resources and creating negative environmental impacts (groundwater and soil pollution, greenhouse gas emissions, etc.). Waste generation from single-use sanitary products account for about 7% of municipal waste streams.

Waste prevention management would lead to major cost savings for local and national authorities in the area of waste disposal. In regard to the maintenance and unblocking of sewage plants, it is estimated that the cost of waste treatment for sewage waste disposed of in wastewater treatment plants in the European Union (EU) amounts to between € 500 - € 1,000 million per year. In addition, costs are often even higher in coastal communities because they also have to dispose of waste from the beach.

If only 20% of users would opt for a single-use menstrual cup the amount of waste in the EU-28 could be reduced by almost 100,000 tonnes per year. What if the money saved by waste prevention management was used towards the abolition of period poverty and the taxation of unsustainable products? The way waste prevention management is handled now shows the clear need for both a green deal and an urgent gender lens.

Acknowledgement of period poverty

Statistics show that one in 10 girls in the UK cannot afford monthly single-use menstrual products. This has a major impact on their quality of life. Given the potential economic savings that reusable menstrual products can bring, making sustainable menstrual products widely available, accessible, and affordable across the EU could be a great help in reducing waste and reducing menstrual poverty. It should be noted that while comparable, investing in a cup or reusable pads is, of course, much cheaper, it is often too expensive for women*, parents and girls living in poverty. There are also certain groups, such as the homeless, who do not have a safe place to hygienically change a cup, or to wash washable menstrual pads, and still rely on disposable products.

Harmful chemicals - the hidden residues in menstrual products

If you have ever pulled a menstrual pad or tampon apart you will know they are a complex construction of materials, a variety of plastics, glues, fluff pulp, and other absorbent materials and gels designed to absorb blood. What is less obvious is the many chemical residues that have been found in these products. Some are intentionally added, some not. Some derive from contamination and processing of the raw materials, others from bonding plastics, added fragrance or odour neutralising technology. But all combine to form a chemical cocktail which may be harmful to our health, as well as the health of wildlife and our environment.

Independent testing of period products such as pads and tampons by organisations and NGOs revealed many toxic residues including pesticides, weedkillers, endocrine disrupting chemicals (EDCs), and chemicals linked to cancer and reproductive disorders. These residues can irritate the delicate skin around the vagina which in turn can increase the risk of contracting other infections or Sexual Transmitted Diseases (STDs). Their presence also raises concerns about links with menstrual problems and diseases like endometriosis. Obviously, many of these chemicals are in small concentrations, but given we can be exposed to many small concentrations from multiple sources in the course of our daily lives, it is this low level, cumulative, and combined exposure to these potentially harmful chemicals that is a serious worry for our health.

It is worth remembering that the vagina is a very absorbent place, drugs can effectively be administered through it and menstrual blood can be used to detect levels of chemical contaminants in our bodies from other sources. We can also be exposed through the work we do. Research has shown that women working with rayon fibres used to make tampons have an increased risk of breast cancer, and miscarriage.
Sense and sensitivities

Many women and people who menstruate have adverse reactions to the chemicals and substances in period products including synthetic fragrances, plastic derived cover sheets, absorbent gels, adhesives, and bleaching residues. These can all irritate the vagina and cause allergies.17 Two of the most common contact allergens are fragrances and preservatives, both found in period products. If comparable levels were found in a cosmetic product, they would require mandatory labelling.18 Campaigns in South Korea 19 and South Africa 20 led to the removal of one product from the market as well as government action on toxic chemicals in period products, and a campaign to raise awareness.

While a move to reusables is much more beneficial for the planet, saving not only waste but also money, we must still be cautious. In the rush for innovation, ignoring the safety of the product could lead to yet more issues and impacts on the health of women and people who menstruate because of the use of untested and potentially toxic ingredients.21 We can see this already with the finding of Per- or poly-fluorinated alkyl substances22 in period pants.23

Whiter than white - Bleaching impacts and sterility illusion

Disposable period pads and panty liners are mostly made from wood or paper pulp which is ‘purified’ from its natural brown colour. But increasingly, menstrual products are made from a variety of woven, spun, and processed plastics. Historically the bleaching or “purification” process was done using chlorine which produced the highly toxic chemical dioxin, contaminating the environment and ending up as a residue in period products.

Nowadays a less polluting method is used. However, unless it is a Totally Chlorine Free (TCF) process, it still produces harmful dioxins, some of which have been detected in period products.24 The irony is that despite being whiter than white, disposable menstrual products are not sterile. They are covered under the General Products Safety Directive25 and not classified as medical devices by the EU.

European Green Deal and menstruation

On 14 October 2020, the EU released its keenly-awaited Chemicals Strategy for Sustainability (CSS).26 The strategy will play an important role in the European Green Deal. Rapid implementation of this strategy is crucial for better protection of people and the environment against harmful substances. Survey after survey shows that the public is clearly and rightly concerned about harmful chemicals polluting our living environment.27 There are 100,000 chemicals on the market in Europe, of which about 70 percent are dangerous. Daily exposure to a mixture of harmful substances is associated with the development and increase of diseases,28 as well as with the loss of biodiversity; threats now recognized by the Commission.

Gender aware chemicals strategy

But how far is the Chemicals Strategy gender aware, and are menstrual products even mentioned? The new EU chemicals strategy is a unique opportunity to rethink the European approach to chemicals management. As menstrual products are permanently excluded from chemicals regulations, they are not even mentioned in the General Products Safety Directive, or in any other chemicals regulation. It is therefore even more important that they become an integral part of European chemicals management.

Children, teenagers, women, and people born as females are particularly vulnerable, especially during periods of susceptibility such as puberty, pregnancy, lactation, and menopause. Most children have already been exposed to a mixture of harmful substances in the womb before birth. Announced measures to improve the categorization and strict regulation of chemicals of concern, such as endocrine disruptors and Per- and polyfluoroalkyl substances (PFAS), are therefore particularly urgent. Normally in this context, consistent application of the polluter pays principle would be necessary. And in this case, the polluter should definitely not be the user, but the industry. Access to ‘safe’ products is often taken for granted, but it is unclear what these are and therefore legislation and regulations often fail to address the issue of harmful, often hidden chemicals in period products.
EU General Product Safety

Tampons and menstrual pads are currently regulated under the EU General Products Safety Directive although it does not specifically mention them. And reusables made from textiles come under the European Regulations on Substances classified as carcinogenic, mutagenic or toxic for reproduction (CMR’s) in textiles. However PPMs are responsible for the safety of their products under the EU chemicals regulation REACH as manufacturers, importers and downstream users of chemicals and across their entire supply chain. There is also a process underway to develop an EU ecolabel for period products which would go a long way to increase choice for safe and sustainably produced products.

Recent ground breaking legislation in New York State requiring PPMs to disclose all the intentionality added ingredients in their products has forced them to list more of the chemical content on their USA websites, similar legislation here could lead to greater transparency. But more work is needed, especially to push for test results on unintentional chemical residues in products. Unfortunately, health and safety legislation on the chemical content of these most intimate items has not kept up with innovation and this extends also to reusables.

The European trade body on nonwovens and related industries, EDANA, also has its own voluntary code which does go into more detail on how EU regulations on chemicals (REACH) will affect ingredients used in menstrual products. However it is still a voluntary code prepared by the trade body which represents the industry. And so in effect is self-policing.

But still as the predominant users and consumers of menstrual products we do not have information on all of the ingredients used in the construction and found in the final period product.

The right to access to safe, sustainable and affordable menstrual products

It is fundamental that recommendations related to EU policy development should be gender-sensitive. An example of the importance of this was the implementation of the SUP, the Single Use Plastics Directive. Although the market for reusable products in Europe has gradually increased in recent years, single-use products dominate the market. But disposable menstrual products were not covered by the European SUP regulation, due to a lobby by feminist organisations who feared that menstrual products would become unaffordable for many people. Therefore, it is important to look at all sides when trying to establish the right to access to, safe, sustainable, and affordable menstrual products for all. Better recognition of the gender-environment-health nexus regarding menstruation can improve environmental and health policies and outcomes as well as increase gender equality. It is important to not only call on the European Commission to establish the right to access safe, sustainable, and affordable menstrual products for all, but at the same time addressing and reducing menstrual poverty.

- Specific legislation is needed on all period products to ensure safety, and transparency throughout the life cycle. Legislation needs to be linked to the EU Circular Economy plan in relation to chemicals, waste, and plastic and in line with the Chemicals Strategy for Sustainability.
- All ingredients and testing results should be published on PPM websites and on period product packaging.
- All tax on period products should be lifted including on reusables items such as period pants.
- Reusable and safe disposable products should be freely available in schools, colleges, and universities for those who need them and provided with straightforward information on how to use, dispose or wash products if needed.
- A more period positive approach should be adapted to menstruation in education to combat cultural views that women’s, girls’, and people who menstruate’s bodies are somehow diseased. Countering period shame and stigma begins with more open and formalised discussion about menstruation in education especially in connection with sustainable development.


4 Kate Blinco, *Half of UK women flush tampons away – this has to stop*, *The Guardian*, Original publication September 16, 2016 (accessed June 15, 2021)

5 Helen Lynn, *Seeing red: menstruation & the environment*, Women's Environmental Network (WEN), 2018


9 "Periodic calculator", Anglia Water (accessed June 15, 2020)

10 Alba Cabrera and Rosa Garcia, *THE ENVIRONMENTAL & ECONOMIC COSTS OF SINGLE-USE MENSTRUAL PRODUCTS, BABY NAPPIES & WET WIPES*, Investigating the impact of these single-use items across Europe (2019)


12 "1 in 10 girls have been unable to afford sanitary wear, survey finds", Plan International UK, Original publication October 13, 2017 (accessed June 15, 2021)


14 Wendee Nicole, *Question for Women’s Health: Chemicals in Feminine Hygiene Products and Personal Lubricants*, Environmental Health Perspectives, Vol. 122, no. 3 (2014)


18 Quinten Marcelis et al., *Development and application of a novel method to assess exposure levels of sensitizing and irritating substances leaching from menstrual hygiene products*, *Emerging Contaminants*, Vol. 7 (2021): 116-23

19 "Women in South Korea Are Taking on Toxic Chemicals in Feminine Care Products!", Women Voices for Earth (WVE), Original publication September 25, 2017 (accessed June 15, 2021)

20 Brittney Mcnamara,"People in Africa Are Using #MyAlwaysExperience Talk About Rashes They Think Were Caused By Always Pads!", TeenVogue, Original publication October 23, 2019 (accessed June 15, 2021)


22 Per- or poly-fluorinated alkyl substances (PFAS) are a group of over 4,700 industrial chemicals used in everyday products


30 European General Product Safety Directive. 2001/95/EC


32 Registration, evaluation, authorisation and restriction of chemicals.

33 "Assembly Bill A164B", The New York State Senate (accessed June 15, 2020)

34 "Product safety", Estée (accessed June 15, 2020)


TOXIC SUBSTANCES REINFORCING RACIST AND SEXIST NORMS: A CASE STUDY OF MERCURY IN SKIN LIGHTENING PRODUCTS

By Elena Lysteridi-Settimo, Rina Guadagnini and Charline Cheuvart
It is an uncomfortable truth that colourism is pervasive worldwide. Many people of colour are under the pressure of Eurocentric beauty standards, based on the racist notion that lighter skin is more desirable. In the quest for lighter skin, many turn to skin lightening products and
by choosing some of the least expensive products, unwittingly expose themselves to more toxic and often illegal substances. Starting in 2021, the Minamata Convention on Mercury requires each country which has ratified the Convention to ban the manufacture, import or export of cosmetics containing over 1 part per million (ppm) mercury. Many European countries have had similar regulations in place for decades, but illegal products, particularly from the internet, are increasingly being purchased.

Over the past few decades, skin-whitening cosmetics have increasingly been advertised in online platforms, shops, glossy magazines, health centres and wellness boutiques, among many others. Beauty standards promoted by the media, advertising, and marketing reinforce the bias towards lighter skin tone. It is important to note that the globalisation of skin whitening is based on more than a desire for lightness. The commonly transmitted message favours skin that is youthful looking and lighter.

This kind of marketing has intentionally (or not) added to the prejudice or discrimination against people, particularly women, with darker skin tones. In fact, manufacturers are well-aware of the colonial patterns they tend to reproduce. Recently, Unilever and L’Oréal announced they would remove references to ‘white’, ‘light’ or ‘fair’ from their product name. Yet, renaming such skin lightening products is not sufficient considering how deeply colourism is now culturally, historically and socially enshrined.

The repeated message “white is better” highlights how deeply race, gender, femininity and ageism are interlinked and how the skin-lightening industry is attempting to make this message sound acceptable. As a result, women in the Philippines prefer white skin because it is “beautiful”, “is clean to look at” or “symbolizes better status in life”. Overall, in Africa, Asia and other regions, women bleach their skin because fair skin is often seen as more attractive. Unfortunately, studies have shown that such practices provide them with an economic advantage.

For example, last year the father of Beyoncé addressed this issue in a radio interview by stating that his daughter is more accepted in the entertainment industry because of her light skin. This issue does not concern only the entertainment world, but seems to be more general: it is quite symptomatic indeed that Kamala Harris’s skin tone had been artificially lightened on Vogue’s cover after her election, raising critics and complaints.

Skin lightening products come in different forms, including creams and soaps, which are often used for decades. They are used all over the world, including in the European Union (EU). In addition to the social, cultural, economic and gender-specific problems, there are serious health issues resulting from the use of mercury and other hazardous substances in these products, which, despite their illegality, are still widely available in the EU.

The production of the pigment melanin in the skin cells is reduced or blocked by mercury compounds. Therefore, the natural ability of the skin to protect itself from UV light is destroyed, thereby increasing the risk of skin cancers in lightened skin. Depending on the active ingredients, skin-lightening formulations can cause a number of direct and indirect skin disorders, as well as neurological and kidney problems.

Mercury is on the World Health Organization’s (WHO) list of the 10 chemicals or groups of chemicals of major health concern. As a WHO fact sheet explains, “Adverse health effects of the inorganic mercury contained in skin lightening creams and soaps include: skin rashes, skin discoloration and scarring, reduction in the skin’s resistance to bacterial and fungal infections, anxiety, depression, psychosis and peripheral neuropathy.”

The amount or concentration of mercury in a product is hardly ever labelled on the packaging or listed in the ingredients list, although directions to avoid contact with silver, gold, rubber, aluminium and jewelry may indicate the presence of mercury. Most mercury in skin lightening products enters the environment in wastewater, and may be transformed there into methylmercury, the most toxic compound, by bacteria. Methylmercury accumulates in fish, and thus, can enter the human diet.

Due to the hazardous nature of mercury-containing products, several regulations were put in place at both the global and European levels to address this.

In the European Union, mercury in cosmetics is prohibited under the Cosmetic Products Regulation 1223/2009. The Mercury Regulation 2017/852 prohibits the manufacture, import and export of mercury added cosmetics. Mercury in cosmetics is also covered through legislation relevant to Trade of Dangerous Chemicals. The production (e.g. for export) in the EU of mercury containing cosmetics was also banned in 2003 under Annex 5 of the EU Regulation 689/2008 implementing the Rotterdam Convention.

To survey illegal use, a functional regional information sharing system, named the Safety Gate Rapid Alert System (RAPEX), established by Article 12 of the EU Directive 2001/95/EC
on general product safety and its notification system, was put in place in the EU. It enables a quick exchange of information between EU/European Economic Area (EEA) member states and the European Commission about non-food products posing a potential risk to consumers. Checking on their website\textsuperscript{16} it is possible to view the recent alerts and reports for such products, including certain skin lightening creams with high mercury levels.

As mentioned above, starting in 2021, the Minamata Convention on Mercury, which recognises the vulnerabilities of specific groups such as women, indigenous communities, children as well as future generations, bans the manufacture, import and export of cosmetics with mercury content above 1 mg/kg (1 ppm). Many countries around the world have adopted equivalent legislation with the same limit. The Minamata Convention secretariat is undertaking efforts to acknowledge the gendered exposure and impacts of mercury and how to tackle them at the policy level.\textsuperscript{17} In May 2021, the Convention has also renewed its commitment to mainstreaming gender within its work programme.\textsuperscript{18}

Despite legal bans, mercury-added products are widely available in shops and sold over the Internet, promoted online on social media sites, and sold through mobile apps. Extensive testing in 2018 and 2019 by the Zero Mercury Working Group (ZMWG),\textsuperscript{19} coordinated by the European Environmental Bureau, the Swedish Society for Nature Conservation and the Mercury Policy Project, confirms that local markets and also internet platforms, such as Amazon and eBay (along with many other online internet marketers worldwide), are selling toxic, dangerous and often illegal skin-lighteners. Many of these products have already been identified by governments around the world as over the legal limit. Further, often due to third party liability protection, e-commerce giants have failed to ensure that cosmetics sold through their sites directly or by third-party sellers are free of toxic and illegal substances like mercury, along with many other hazardous products.

In our most recent testing study, “Dangerous, mercury-laden and often illegal skin-lightening products: Readily available for (online) purchase,”\textsuperscript{20} the collection of samples was carried out by NGO partners of the ZMWG\textsuperscript{21} in 12 countries.\textsuperscript{22} 158 samples were bought from both shops and large e-commerce platforms and 95 of them were found to violate the limit of one ppm.

Products had mercury contents that ranged from 40 ppm to over 130,000 ppm. Nine creams (or 9.5\%) had mercury contents exceeding 100,000 times the allowed limit established in the Minamata Convention. Sixty-five of the non-compliant creams (or 68\%) were bought online.

The table below provides examples of brands purchased in the EU, which violate the 1 ppm limit compiled as a result of this investigation.

<table>
<thead>
<tr>
<th>Product name</th>
<th>Country of origin as per packaging</th>
<th>E-commerce platform</th>
<th>Mercury content (ppm)</th>
</tr>
</thead>
<tbody>
<tr>
<td>JiaoBi Whitening set, make up base</td>
<td>China</td>
<td>eBay, Belgium</td>
<td>20,813</td>
</tr>
<tr>
<td>JiaoBi Whitening set, Night cream</td>
<td>China</td>
<td>eBay, Belgium</td>
<td>15,404</td>
</tr>
<tr>
<td>Goree Whitening Beauty Anti-aging spots pimples removing Cream</td>
<td>Pakistan</td>
<td>eBay, Belgium</td>
<td>12,656</td>
</tr>
<tr>
<td>Chandni Whitening Cream</td>
<td>Pakistan</td>
<td>Amazon, UK</td>
<td>11,928</td>
</tr>
<tr>
<td>Golden Pearl Whitening Beauty Cream</td>
<td>Pakistan</td>
<td>Amazon, UK</td>
<td>10,515</td>
</tr>
<tr>
<td>Golden Pearl Whitening Beauty Cream</td>
<td>Pakistan</td>
<td>eBay, Belgium</td>
<td>5,266-10,338</td>
</tr>
<tr>
<td>White Rose Whitening Cream (super Gold Caviar)</td>
<td>Thailand</td>
<td>eBay, Belgium</td>
<td>6,188</td>
</tr>
<tr>
<td>Jiaoli Miraculous Cream set, cream B</td>
<td>China</td>
<td>eBay, Belgium</td>
<td>1,543</td>
</tr>
<tr>
<td>Jiaoli Miraculous Cream set, cream A</td>
<td>China</td>
<td>eBay, Belgium</td>
<td>585</td>
</tr>
<tr>
<td>Pop Popular Facial Cream Whitening Acne Pimple</td>
<td>Thailand</td>
<td>eBay, Belgium</td>
<td>2</td>
</tr>
</tbody>
</table>
As seen in the table, well-known brands can be easily found on the EU market and purchased by consumers, not aware of the risks involved. This is an issue of growing concern, as the sale of skin-lightening products is a fast growing multi-billion-dollar industry, spurred on by increased advertising and online sales during the pandemic.

While many products are mislabeled or counterfeit, such cosmetics are thought (but not yet confirmed) to be produced in several countries, including Bangladesh, China, Dominican Republic, Jamaica, Lebanon, Mexico, Pakistan, the Philippines, and Thailand. Additional research is currently being conducted to determine which countries have high production manufacturing.

Following the release of our report and direct contact with the e-platforms, several on-line platforms including Amazon UK, US as well as Jumia, and Daraz, removed from their platforms the skin lightening creams we had found to contain high mercury. In parallel, NGO partners of the ZMWG continue to monitor on-line platforms on a regular basis to verify whether those creams or new ones do (re)appear. Some of them are also reaching out to their governments and/or relevant agencies in view of identifying potential gaps and improving enforcement.

Efforts are needed at the EU level and globally, to enact laws and regulations and to strengthen enforcement measures, as outlined in our ZMWG enforcement report. In addition, a liability regime for online marketplaces should be enacted and coordination promoted between Parties to the Minamata Convention on Mercury, given the high proportion of illegal activities online, such as the often illegal and unsafe products ZMWG purchased. Furthermore, internet platforms should be regulated in a manner similar to local markets, including the obligation to require product labeling and country of origin, verify traders and conduct random checks on services and products offered.

Such measures could be better complemented if trends towards skin lightening is reversed and if the media, beauty, film and modeling industry put an end to advertising the superiority of white/fair skin. For this to happen, a change of mindset is needed and movements - such as ‘Women of Worth’ in India and the ‘Dark is Beautiful Campaign,’ ‘Unfair & Lovely’ in Austin, USA or ‘Dark is Divine’ in Pakistan - have been playing a key role on that matter. They all seek to bring cultural change and make today’s societies more inclusive, with this common message that all colours are equally beautiful.

2 Rachel Ramirez, "Beauty companies are changing skin-whitening products. But the damage of colorism runs deeper", Vox, Original publication July 1, 2020 (accessed June 15, 2021)
3 Ecowaste Coalition, Toxic Expose: Online Trade of Mercury-Containing Skin Whitening Cosmetics in the Philippines (2021)
4 Ola Brown, "Banning skin bleaching products won't work as long as fair skin is linked with beauty and success", CNN, Original publication January 15, 2019 (accessed June 15, 2021)
5 Ola Brown, "Banning skin bleaching products won't work as long as fair skin is linked with beauty and success", CNN, Original publication January 15, 2019 (accessed June 15, 2021)
7 World Health Organization, Preventing disease through healthy environments: mercury in skin lightening products (World Health Organization, 2019)
8 Andreas Prevednik et al., MERCURY-ADDED SKIN-LIGHTENING CREAMS: Available, inexpensive and toxic (2018)
10 Zero mercury, FACT SHEET: Mercury in Skin Lightening Cosmetics (2019)
11 WHO, Exposure to Mercury, a major public health concern (2021); WHO, Mercury in skin lighting products (2019); "Mercury and health", WHO, Original publication March 31, 2017 (accessed June 15, 2021)
12 WHO, Mercury in skin lighting products
TOXIC SUBSTANCES REINFORCING RACIST AND SEXIST NORMS

EUROPEAN PARLIAMENT AND OF THE COUNCIL of 30 November 2009 on cosmetic products, 2009, Brussels


Andreas Prevodnik et al., Enforcement measures to restrict high mercury cosmetic products under the Minamata Convention (Zero Mercury Working Group, 2019)

“Safety Gate: the EU rapid alert system for dangerous non-food products”, European Commission (accessed June 15, 2021)

Marianne Bailey, Women and Mercury: Role of the Minamata Convention what needs to be achieved at the policy and implementation levels to reduce women’s exposure to mercury (2020)


The Zero Mercury Working Group (ZMWG) is an international coalition of more than 110 public interest environmental and health non-governmental organizations from over 55 countries from around the world formed in 2005 by the European Environmental Bureau and the Mercury Policy Project. ZMWG strives for zero supply, demand, and emissions of mercury from all anthropogenic sources, with the goal of reducing mercury in the global environment to a minimum. Our mission is to advocate and support the adoption and implementation of a legally binding instrument which contains mandatory obligations to eliminate where feasible, and otherwise minimize, the global supply and trade of mercury, the global demand for mercury, anthropogenic releases of mercury to the environment, and human and wildlife exposure to mercury. Zeromercury (accessed June 15, 2021)

Andreas Prevodnik et al., Dangerous, mercury-laden and often illegal skin-lightening products (Zero Mercury Working Group, 2019)

Environment and Social Development Organization (ESDO), Bangladesh; European Environmental Bureau (EEB), the European Union; Toxics Link (TL), India; Centre Africain pour la Santé Environnementale (CASE), Côte d’Ivoire; Centre for Environment, Justice and Development (CEJAD), Kenya; Center for Public Health and Environmental Development (CEPHED), Nepal; Sustainable Research And Action For Environmental Development (SRADev), Nigeria; Ban Toxics (BT), the Philippines; groundwork South Africa (gW), South Africa; Bio Visio Africa (BIVA), Uganda; Mercury Policy Project (MPP), USA.

Bangladesh, Djibouti, European Union (EU) (the member states Belgium and UK), India, Côte d’Ivoire, Kenya, Nigeria, the Philippines, South Africa, the United States of America (USA) and Uganda.

Find the letters sent to Ebay and Amazon on the ZWMG website: Mercury-Added Skin-Lightening Creams: Campaign – Zero Mercury (accessed June 15, 2021)

Prevodnik et al., Enforcement measures to restrict high mercury cosmetic products under the Minamata Convention