

Preliminary assessment of the EU Green Deal's impact on equality

Survey of current practices and needs of European
Equality Bodies

by Siel Hoornaert, Katrien van der Heyden, and
Babs Verhoeve



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Equinet Secretariat | Place Victor Horta, 40 | 1060 Brussels | Belgium |

info@equineteurope.org | www.equineteurope.org

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Authors

- Siel Hoornaert,
- Katrien van der Heyden
- Babs Verhoeve

Editorial and Publication Coordination

Moana Genevey (Equinet, European Network of Equality Bodies)

Formatting

Gumru Aliyeva (Equinet, European Network of Equality Bodies)

Contents

Acknowledgements	iii
Executive summary	vi
Objectives	vi
Scope.....	vi
Deliverables.....	vii
Operationalisation	vii
1. Introduction	8
1.1 Climate, equality, and the European Green Deal	9
1.2 Equality Bodies and the EU Green Deal	10
2. The equality dimension of the European Green Deal	11
2.1 The climate crisis and inequality.....	12
2.2 The European Green Deal.....	14
2.3 Energy: buildings and housing	15
Energy poverty and equality	16
2.4 The circular economy.....	17
Job creation.....	17
Sustainable products.....	19
2.5 Fisheries	20
2.6 Land use, agriculture, and forestry (LULUCF)	21
2.7 Road transport	24
2.8 Financial compensation: social climate fund and ETS revenues.....	26
3. Equality Bodies and the EU Green Deal	28
3.1 Equality Bodies.....	29
3.2 Survey results.....	30
3.3 Interview results	38
Climate issues as a driver of inequality.....	39
Expertise and resources.....	40
Involvement in policy and legislation at the national and EU level	43
4. Promising practice cases and recommendations	46
4.1 Promising practice cases	47
(International) Collaboration with other stakeholders.....	47

Research.....	48
Legal good practices: climate law	49
Individual discrimination.....	49
Low emission zones	49
Roma people	49
Pesticide use	50
Whistle-blowers	51
4.2. Recommendations for Equinet	52
4.3 Recommendations for Equality Bodies	53
EU level: adoption of EU Green Deal and Fit for 55 measures	53
National level: implementation	53
5. Conclusion	56
Annex 1: list of survey questions	58

Executive summary

It is evident that the climate emergency is disproportionately affecting certain groups within society such as the poor, marginalised, young, and elderly people, women etc. These groups are highly vulnerable to the adverse effects of climate change, biodiversity loss and pollution, and they often lack the necessary resources and tools to effectively cope with and recover from the damage they suffer. Equality-blind climate policies carry a risk of accentuating these inequalities, increasing poverty, and creating social unrest among these communities.

The European Union has introduced an ambitious plan to realise a major transition towards a carbon neutral society by 2050, called the European Green Deal. The EU Green Deal measures present an opportunity to address both climate change and inequality. The European Union also has policies in place to promote equality and non-discrimination. However, it is crucial to consistently apply an equality perspective to all proposed measures of the EU Green Deal to prevent further inequality. Moreover, an intersectional approach that considers various forms of discrimination is necessary to tackle these issues.

This report summarises the findings of a study commissioned by Equinet aiming to explore the relationship between the EU Green Deal and equality, with a special focus on how vulnerable groups in European society may be impacted by its implementation. Equality Bodies have a significant role to play in advocating for and representing these vulnerable groups in climate policy. The results of a survey among Equinet members indicate that there is an interest to address the issue. Equinet members, however, express a general lack of information, resources, and legal mandate to effectively play their role.

The report highlights promising initiatives and offers recommendations to both Equinet and its members to effectively address climate and inequality.

Objectives

This report summarises the results of a study commissioned by Equinet aiming to explore the relationship between the EU Green Deal and equality, with a specific focus on how vulnerable groups in European society may be impacted by its implementation.

The study includes a survey and interviews with Equality Bodies in European Member States to understand their knowledge and perspectives on the subject, and to identify opportunities for advising legislators to ensure non-discrimination. The findings of the study could potentially inform policy decisions and ensure that the EU Green Deal is implemented in an equitable and inclusive manner.

Scope

Given the extensive nature of both the EU Green Deal and the matter of (in)equality, the authors of this report have chosen to focus on four specific sectors of the EU Green Deal that are particularly relevant to concerns of equality and discrimination. These sectors include energy consumption in

homes and buildings, circular economy, environment, and land use (including forestry and fisheries), and road transport. In examining the impact of these sectors on equality, the report focuses on various key grounds of discrimination, including gender, age, disability, sexual orientation, race and ethnic origin, and socio-economic status.

The report does not offer an exhaustive analysis on the EU Green Deal policies, nor does it systematically address every potential instance of discrimination. Rather, several relevant examples highlight the potential impact of the EU Green Deal on vulnerable groups. Note that at the time of authoring this report (July 2022 - February 2023), not all measures of the EU Green Deal had been legally adopted. At the time of submission of the final report (May 2023), a provisional agreement was reached on the final Fit for 55 package, requiring formal adoption by the European Parliament and the European Council. Once this process is complete, the new legislation will be published in the Official Journal and enter into force.

Deliverables

The deliverable at hand is this report, of which a first draft was submitted in December, 2022 and the definitive version in May, 2023. The deliverable includes a summary with background information on both inequality and the EU Green Deal, an investigation into the current situation within Equality Bodies throughout Europe via questionnaire and interview results, and finally, a selection of recommendations and promising practice cases. In September 2023, Equinet will organise an online roundtable to present and discuss the results of this report as an initial analysis and the ways forward.

Operationalisation

Important terms used in this report are:

- **Equality:** Fair treatment and having equal rights and opportunities, regardless of grounds such as gender, age, disability, sexual orientation, race and ethnic origin, and socio-economic status, etc.
- **European Green Deal:** A long-term strategy by the European Union to reach carbon neutrality by 2050.
- **“Fit for 55”:** A package of legislative proposals by the European Commission to reach a greenhouse gas emission reduction of 55% by 2030, compared to 1990 levels.
- **Intersectionality:** The interaction and intersection between facets of identity, such as gender, race, ethnicity, sexual orientation, gender identity, disability, and class. Individuals who are members of any combination of marginalised groups experience unique experiences of discrimination and marginalisation.



1. Introduction

1.1 Climate, equality, and the European Green Deal

The ongoing climate crisis has a disproportionate impact on diverse groups within society, with those most vulnerable often suffering most from the adverse effects. These groups contribute less to the crisis but are more affected by its consequences. Moreover, they often have limited resources to adapt to the changing circumstances¹ (e.g., single mothers often cannot afford solar panels or to properly insulate their houses²). In December of 2019, the European Union agreed on a major strategy to transition its economy and society towards carbon neutrality by 2050, called the [European \(EU\) Green Deal](#). “Fit for 55” is a first package of measures to reach a 55% reduction of greenhouse gas emissions by 2030, compared to 1990 levels. It is important to note that at the time of this study, many of the Green Deal and Fit for 55 measures had not been formally adopted yet. For those measures, the report used the latest available official proposals. As of April 25th, a political agreement has been reached on the last package of Fit for 55 measures. These measures still require formal adoption by the European Parliament and the European Council and official publication.

In addition to its effort towards achieving a carbon-neutral society, the European Union also emphasises its commitments to equality, diversity, and inclusion. The EU regards equality and non-discrimination as fundamental values and has implemented legislative measures to protect individuals from being discriminated against (Articles 8 and 10 of the Treaty, as amended by the Treaty of Lisbon). Therefore, all actions by the EU, its institutions, and its Member States, should be guided by equality considerations. According to a briefing by Equality Commissioner Dalli, *‘various strategies in the framework of the Union of Equality contribute to promote horizontally and mainstream equality, also by adopting an intersectional approach to detect and address multiple discrimination’*³. The European Commission has established an [equality task force](#) to support the EU institutions in this process.

It is crucial that the EU Green Deal and its implementing measures consider the equality and non-discrimination dimensions of its climate policies from the outset. Failing to do so risks exacerbating existing inequalities. It is therefore essential to apply an intersectional approach to the implementation of the EU Green Deal to ensure that vulnerable groups are not left behind and the transition towards a carbon-neutral society is fair and inclusive.

¹ Oxfam: Carbon Billionaires: The investment emissions of the world’s richest people. 2022. <https://policy-practice.oxfam.org/resources/carbon-billionaires-the-investment-emissions-of-the-worlds-richest-people-621446/>

² European Parliament: The situation of Single Parents in the EU, 2020. [https://www.europarl.europa.eu/RegData/etudes/STUD/2020/659870/IPOL_STU\(2020\)659870_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2020/659870/IPOL_STU(2020)659870_EN.pdf)

³ Tracking commissioner Dalli Sept 2022: [https://www.europarl.europa.eu/RegData/etudes/BRIE/2022/731953/IPOL_BRI\(2022\)731953_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2022/731953/IPOL_BRI(2022)731953_EN.pdf)

1.2 Equality Bodies and the EU Green Deal

The primary responsibility for the implementation of the EU Green Deal lies with the EU Member States. They draft domestic policies that translate European climate ambitions into national or local measures. This represents an opportunity for European Equality Bodies in the various Member States to be involved in the national, regional, and local decision-making process in order to minimise the risk of amplifying inequality and discrimination. Equality Bodies can only conduct this task successfully if they are well informed about the EU Green Deal and its implications for equality. While the legislative process will take time, it is essential for Equality Bodies to prepare themselves. This report aims to support Equality Bodies in their endeavour to assist the most vulnerable groups they serve and advocate for their needs.



2. The equality dimension of the European Green Deal

2.1 The climate crisis and inequality

Climate change disproportionately affects marginalised communities and exacerbates existing inequalities. The most affected people and areas (MAPA)⁴ are disproportionately impacted by climate disasters, environmental pollution, and biodiversity and habitat loss. This can lead to increased poverty, displacement, and social unrest. On a global scale, countries in the global south are now facing numerous natural disasters, such as heat waves, flooding, and droughts. This imbalance between the global south and north is a painful reminder of the unequal power balance ingrained in the colonial history of this planet.

Also within Europe, people on the margins of society are more likely to be victims of the climate crisis (e.g., floods or heat waves) and are suffering most from the loss of a healthy natural environment in the places they live⁵. At the same time, they are less equipped to adapt to climate change due to a lack of resources, and therefore most at risk of being left behind in the energy transition.

For example, the 2003 heatwave in France serves as a painful reminder of how the climate crisis targets those who are most vulnerable. Approximately 15,000 people died because of the heat wave, almost all of whom were old people. This does not come as a surprise, as the negative effects of heat waves on the elderly are well known. Interestingly, the figures also showed 2/3 of the victims were women, specifically poor women living alone in marginalised suburban neighbourhoods in the big cities of France (*les banlieues*)⁶.

These heat waves disproportionately affected people of a specific gender, age, and socio-economic status. This illustrates the intersectional effects of climate disasters. Women are at higher risk of poverty especially if they are single, senior women. The lower relative wages of women, contrary to the principle and right of equal pay, create a vicious cycle in which the wage gap encourages more women to perform unpaid work within the household, resulting in greater absence from the labour market, which in turn, leads to lower pay and lower pension⁷. Risk of poverty increases with age, especially in retirement, when women receive retirement benefits that are 40% lower on average

⁴Climate Change and LandAn IPCC Special Report on climate change, desertification, land degradation, sustainable land management, food security, and greenhouse gas fluxes in terrestrial ecosystems. Intergovernmental Panel of Climate Change. 2019. p. 17. "What is MAPA and why should we pay attention to it?". Newsletter - Fridays For Future. 2021-03-13.

⁵Poumadere, M., Mays, C., Le Mer, S., & Blong, R. (2005). The 2003 heat wave in France: dangerous climate change here and now. *Risk Analysis: an International Journal*, 25(6), 1483-1494; Hallegatte, S., & Rozenberg, J. (2017). Climate change through a poverty lens. *Nature Climate Change*, 7(4), 250-256.

⁶Fouillet A, Rey G, Wagner V, Laaidi K, Empereur-Bissonnet P, Le Tertre A, Frayssinet P, Bessemoulin P, Laurent F, De Crouy-Chanel P, Jouglu E, Hémon D. [Has the impact of heat waves on mortality changed in France since the European heat wave of summer 2003? A study of the 2006 heat wave.](#) *Int J Epidemiol.* 2008 Apr;37(2):309-17. doi: 10.1093/ije/dym253. Epub 2008 Jan 13. PMID: 18194962; PMCID: PMC2652641.

⁷Eurostat. (2021, February 3). Women and men in leadership positions. Eurostat newsrelease. [https://ec.europa.eu/eurostat/web/products-eurostat-news/-/ddn-20210203-1#:~:text=in%202019%2C%20women%20in%20the,compared%20with%202010%20\(34%25\).](https://ec.europa.eu/eurostat/web/products-eurostat-news/-/ddn-20210203-1#:~:text=in%202019%2C%20women%20in%20the,compared%20with%202010%20(34%25).)

than those of men⁸ and subsequently, have less budget for air conditioning or proper health care, leading to their higher risk of dying in a heat wave. This is one of many examples of disasters that struck various European Member States, which repeatedly prove that the most vulnerable people in society are most at risk of becoming victims of climate change.

This also happens during the emergency relief efforts afterwards. There are many important questions to keep in mind when providing such relief. For example, when evacuating people from an affected area, have safe spaces been provided for the LGBTQI+ community to prevent bullying or harassment in temporary shelters⁹? Do emergency relief plans and evacuation routes take people with disabilities and their special needs into account?¹⁰ Are specific measures taken to reach and inform elderly people if they are digitally illiterate and do not have access to Wi-Fi? According to the [Digital 2019 report](#), 82% of young individuals (aged 16 - 24), 85% of those with high formal education, 68% of employed or self-employed people and 87% of students have at least basic digital skills. By contrast, only 35% of those aged 55-74 and 30% of the retired and the inactive possess basic skills¹¹.

More such examples can be found in the context of the climate crisis. If these are not taken into account, there is a genuine risk that policies to realise the carbon transition will be blind to its effects on equality, both at the EU level and at national, regional, or local level.

Additionally, people's response to crises can be a coping strategy that is useful to survive, but harmful for the planet, such as burning wood or polluting materials (and thus creating harmful dust and CO₂) for heating during the energy crisis. Another example is that people are bound by (gender) stereotypes that make it difficult to fully participate in certain areas of life, such as women in STEM who experience barriers in their education and jobs. And precisely these STEM jobs will be on the rise in many climate adaptation projects. Many examples like these show that equality considerations go both ways. These can harm affected groups, but conversely can also harm the efforts to reach the objectives of the Green Deal (e.g., people in rural areas and persons with disabilities continuing to use fossil fuel cars, labour shortages in the green tech sector, the inability to change to more sustainable forms of heating, etc.).

⁸ European Institute for Gender Equality. (n.d.). Poverty. <https://eige.europa.eu/gender-mainstreaming/policy-areas/poverty>

⁹ Office of the United Nations High Commissioner for Human Rights. (2019, August). Right to housing for LGBT youth: An urgent task for SDG agenda-setting. <https://www.ohchr.org/en/statements/2019/08/right-housing-lgbt-youth-urgent-task-sdg-agenda-setting>

¹⁰The European Disability Forum already dedicated a report on 'Green EDF Policy', 2022.

<https://www.edf-feph.org/publications/green-edf-policy/>

¹¹Data on digital divide: <https://ec.europa.eu/digital-single-market/en/human-capital>

2.2 The European Green Deal

The Paris Agreement sets out a global objective to reach carbon neutrality by 2050. To implement this obligation, the European Union (EU) agreed on an ambitious climate action plan in December 2019. The [European Green Deal](#) outlines a major transition towards a carbon neutral society within Europe by 2050. [Fit for 55](#) is the first legislative package adopted to realise a reduction of 55% of greenhouse gas emission by 2030 (compared to 1990 levels). The European Parliament has already negotiated agreements with EU governments on [CBAM](#) (Carbon Border Adjustment Mechanism introducing a levy on carbon-intensive imported goods) [CO₂ cars](#), (emission standards for cars) [LULUCF](#) (Land Use, Land Use Change, and Forestry), [Effort Sharing](#) (binding emission reduction targets for each Member State for road transport, heating of buildings, agriculture, small industrial installations and waste management), and [ETS aviation](#) (emission reduction for aviation). At the end of April 2023, political agreement was reached between the European Parliament and the European Council on the last package of measures (adjustments to existing ETS, expansion of ETS to maritime transport and aviation, CO₂ cars, creation of a new ETS for commercial buildings and transport, LULUCF, effort sharing and social climate fund). Formal adoption and publication in the Official Journal are pending.

Although the EU Green Deal primarily focuses on energy and the reduction of greenhouse gas emissions, its implementation will directly impact various areas of society such as land use, transport, buildings, housing, industry, and employment — in short, the way people live and do business. Despite the European policies regarding equality and non-discrimination already in place, the EU Green Deal risks further increasing existing inequalities in society by not consistently including an equality perspective in its ambition to reach carbon neutrality.

The EU Member States are primarily responsible for the implementation of the proposed EU measures and will be asked to draft a [Social Climate Plan](#) to guarantee a just transition for all. In return, Member States will be eligible for EU funding to guarantee a fair and socially inclusive transition, through a €86.7 billion [Social Climate Fund](#) and the revenues of the extended Emission Trading System. It is important that civil society and Equality Bodies are aware of the potential impact of the EU Green Deal and its implementation into national legislation on vulnerable groups. They have the ability and expertise to draw attention to the situation of marginalised groups such as women, racialised people, migrant workers, older persons, people with disabilities, LGBTQIA+ people, etc., in order to engage with relevant authorities and ensure that Member States use these funds to provide adequate compensation for those who need it most.

In the sections below, EU Green Deal measures in areas with considerable potential impact on equality are discussed. These areas are energy, buildings and housing, transport, fisheries, circular economy, and land use. It is not in the scope of this report to give an exhaustive overview of all inequality aspects related to these topics, rather, some examples are given illustrating the link between inequality and the EU Green Deal.

It is important to keep in mind that many of the EU Green Deal measures have not been formally adopted yet. The Fit for 55 package contains a series of measures to reach a 55% reduction of carbon emission by 2030. About half of the legislative package has been formally adopted, while the other half is still being negotiated and expected to be adopted in the course of 2023. Aviation and maritime emissions are an example of transport measures still on the shelf.

2.3 Energy: buildings and housing

The housing sector is one of the sectors included in the [Effort Sharing Regulation](#). It aims to boost the emission reduction target from 29% to 40% by 2030, compared to 2005 levels.

Complementing Member States' initiatives under the Effort Sharing Regulation, the EU Council reached political agreement in April 2023 on [the proposal to create a new Emission Trading System \(ETS\) for the commercial building \(and road transport\) sector](#). In 2005 a carbon emission market was created for the heavy industry sector, with a cap on the total amount of greenhouse gas emissions and companies having to buy allowances to emit these emissions. The cap on total emissions is reduced yearly, leading to a rising emission price. This forces the industry to invest in energy efficiency. The ETS for the building sector (and road transport sector) will start operating from 2027.

The [Energy Efficiency Performance Directive](#) of 2010 and the [Energy Efficiency Directive of 2012](#) were amended in 2018 and 2019, as part of [the Clean energy for all Europeans package](#). In December 2021, the Commission [proposed a revision of the directive](#) (COM(2021) 802 final) to introduce more ambitious targets, while allowing EU Member States to take into account different circumstances across Europe.

Although the ETS does not regulate end-consumers, the recent decision to include the building sector in a separate new ETS and the creation of stricter energy performance standards may lead to rising energy costs. This will affect vulnerable households the hardest¹². The EU Parliament and European Council agreed on the creation of a special fund to compensate for unequal impact. See more under the Social Climate Fund below.

¹² According to the EU, energy poverty consists of: Energy poverty occurs when energy bills represent a high percentage of consumers' income, or when they must reduce their household's energy consumption to a degree that negatively impacts their health and well-being. European Commission. (n.d.). Energy poverty in the EU. https://energy.ec.europa.eu/topics/markets-and-consumers/energy-consumer-rights/energy-poverty-eu_en

Energy poverty and equality

The EU Green Deal is calling for a profound reduction in the use of energy and a swift change to renewable sources of energy. The war in Ukraine made this even more urgent. The spike in energy prices resulted in energy poverty¹³ for many Europeans. As such, energy poverty is a novel concept on the spectrum of ways in which people can be poor and is creating a dangerous tipping point where many people who have never lived in a situation of poverty in their lives, now find themselves unable to sustain their housing and feeding needs due to rising energy prices.

Moreover, the energy market and its related policies are creating a 'Matthew Effect'¹⁴: the rich are getting richer, and the poor are becoming poorer. Richer people have the means to invest in electric cars, solar panels, good housing insulation and can thus reduce their energy bills. Poorer people are unable to make these investments and thus withstand the worst of the high energy prices.

The intersectional aspect of energy poverty is visible as poverty is higher among women¹⁵, and persons with disabilities, among others. For example, 28.4% of persons with disabilities are at risk of poverty and social exclusion compared to 18.4% of persons without disability¹⁶.

However, this poverty often remains invisible. Monitoring is usually done on a household level, which risks making the income level disparities and economic dependence of individual household members invisible¹⁷. People with disabilities and/or women often depend on other earners in their household and this economic dependence makes them more vulnerable to abuse and violence. The power imbalance often present within households is thus not addressed, risking poor individuals to become even more dependent on family members.

¹³ See also: https://energy-poverty.ec.europa.eu/index_en

¹⁴ The concept of Matthew Effect was coined by the late professor Deleeck of the university of Antwerp, referring to the bible passage of Matthew saying the rich will get richer and the poor will get poorer. We often observe this unwanted effect when policy makers give subsidies to middle class populations to improve their housing, education, energy efficiency as a top up on their own investments, but since poor populations do not have the means to invest their own part, they can't get hold of the subsidies, thus increasing the poverty gap. The Matthew effect has a solid intersectional dimension to it, i.e. it grows the more vulnerable identities a person has.

¹⁵ J. Clancy, V. Daskalova, M. Feenstra, N. Franceschelli, M. Sanz, Gender perspective on access to energy in the EU, Study for the FEMM Committee of the European Parliament, December 2017, p.36.

¹⁶ European Commission: Strategy for the rights of persons with disabilities 2021 - 2030.

¹⁷ Karagiannaki, E., & Burchardt, T. (2020). *Intra-household inequality and adult material deprivation in Europe*. Centre for Analysis of Social Exclusion, London School of Economics.

2.4 The circular economy

In March 2020, the European Commission adopted a [circular economy action plan \(CEAP\)](#) as an important part of the European Green Deal. To achieve climate neutrality and stop biodiversity loss by 2050, the life cycle of products is extended as much as possible, and waste is reduced to a minimum. In a circular economy, products are re-used, shared, repaired, refurbished, and recycled. At the end of a product's life, materials are recycled to keep them within the economy.

The EU's transition to a circular economy will reduce the use of natural resources and will create new jobs.

See also the [ETS](#) and [CBAM](#) for heavy emitting industrial sectors, the [Effort Sharing regulation](#) for sectors not included in the ETS system (waste, housing, agriculture, etc.).

Job creation

In general, there is discrimination on all the above-mentioned grounds in the labour market in Europe. White, healthy, young, non-migrant, middle-class men are favoured over any other profile^{18,19,20,21}. This is a result of structural discrimination in enterprises, administration, and industry, and of unconscious biases²². Many Equality Bodies take on the role of defending people who face such discrimination²³. Many workplaces are not yet safe spaces for people who do not have the above-mentioned profile. Certain groups are more prone to be victims of sexual harassment and/or stereotypes of any kind. This is especially true in heavy industry, where a sexist culture often still prevails²⁴.

¹⁸Discrimination based on sex: In 2021, 5.23 million women in the EU reported feeling they were being discriminated against at work. Far fewer men, 3.63 million, reported the same.

Source: Eurostat. (2021, March 12). Self-perceived discrimination at work - statistics. Eurostat Statistics Explained. https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Self-perceived_discrimination_at_work_-_statistics

¹⁹ Discrimination based on ethnic origin: in the EU, the highest percentages for both men (7.7%) and women (8.8%) feeling discriminated at work were registered among those born in a non-EU country, followed by those born in another EU country (5.4% for men and 7.5% for women). By contrast, the percentages of employed people born in the reporting country feeling discriminated at work were much lower: 3.2% for men and 5.8% for women.

Source: Eurostat. (2022, October 18). At-risk-of-poverty rate in the EU increased to 17.9% in 2021. Eurostat news release. <https://ec.europa.eu/eurostat/web/products-eurostat-news/-/ddn-20221018-3>

²⁰Discrimination based on disability: 50,8% of persons with disabilities are in employment compared to 75% without disabilities. Source: Union of equality, Strategy for the rights of persons with disabilities 2021 - 2030. EU commission 2021.

²¹Discrimination based on age: Discrimination on the basis of age occurs in the field of employment, but is also very pervasive in access to goods and services. Source:

AGE Platform Europe. (2018, October 2). New EU report shows lack of protection against age discrimination beyond employment. <https://www.age-platform.eu/policy-work/news/new-eu-report-shows-lack-protection-age-discrimination-beyond-employment>

²²Examples of gender based unconscious bias are found in: EIGE, Sexism at work; How can we stop it? 2020.

²³ Domestic and Care Worker: Domestic and Care Workers in Europe: An Intersectional Issue – Equinet

Women in Poverty, Breaking the Cycle: Women in Poverty: Breaking the Cycle – Equinet

Equality Bodies and Reasonable Accommodation Beyond Disability: An Equinet Perspective: Equality Bodies and Reasonable Accommodation Beyond the Ground of Disability

Reasonable Accommodation for Persons with disabilities: Reasonable-Accommodation-Disability-Discussion-Paper.pdf

²⁴Can new technology challenge macho-masculinities? The case of the mining industry Lena Abrahamsson & Jan Johansson ; Mineral Economics; volume 34, pages 263–275 (2021).

The emphasis in the climate transition is often on technology-based industry and enterprises. This industry especially favours men, often already from high school level. For instance, girls are not inclined to study such professions or/and are not welcomed when they do due to gender stereotypes²⁵. At the same time, men from certain ethnic backgrounds may face discrimination and exploitation²⁶. Indeed, Europe has a history of employing migrant men in the energy sector like the Turkish and Moroccan men who came to work in the mining industry in the 1960's²⁷ and were often treated as second hand citizens. Even today, difficult unskilled labour tends to be conducted by migrant workers²⁸.

The same can be said for persons with disabilities. People with neurological conditions such as autism spectrum disorder (ASD) or attention deficit hyperactivity disorder (ADHD) risk being bullied at work²⁹. These and physical types of disabilities might not get reasonable accommodation. In general, only 50% of persons with disabilities are employed, compared to 75% of persons without disabilities³⁰. These people also risk losing out on opportunities for the new green jobs in the energy transition. In turn, effectively closing out the groups mentioned from this segment of the labour market makes it much more difficult to address labour shortages in the sector.

The energy sector is a driver of economic development, underpinning all forms of economic activity. It is also a significant aspect of everyday life through its domestic uses and its role in modern communications, transport, and technology. Furthermore, energy production and use are intricately connected with climate change. Increasing women's participation in the green labour market may help to address the workforce shortage.

²⁵ European Parliament's Policy Department for Citizens' Rights and Constitutional Affairs: Education and employment of women in science, technology, and the digital economy, including AI and its influence on gender equality, 2021.

²⁶Ethnic discrimination: Paradoxically, migrants with acquired training and skills commonly face non-recognition of training credentials and experiences in countries of origin. The result is 'deskilling' where they obtain jobs far below their level of qualifications. Source: Glass ceiling for ethnic minorities, ENAR, 2013.

²⁷ Interact project: European Commission. (n.d.). Interact project corridor report: Belgium case - Moroccan and Turkish immigrants. https://ec.europa.eu/migrant-integration/library-document/interact-project-corridor-report-belgium-case-moroccan-and-turkish-immigrants_en

²⁸ Statistics on migration and work in Europe: European Commission. (n.d.). Statistics on migration in Europe. https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/promoting-our-european-way-life/statistics-migration-europe_en

²⁹ Mellifont, D., Facilitators, and inhibitors of mental discrimination in the workplace: a traditional review. *Studies in social justice*, 2021. 15(1): p. 59-80.

³⁰See footnote 8.

“I strongly believe that the promotion of gender equality in the energy sector has tremendous potential, especially in the context of the clean energy transition, which according to recent estimates can create 60 million new jobs globally in the next 20 years. The EU Green Deal is our climate and growth strategy, but it can also help us in our quest towards gender equality. I am far from thinking that women are or should be interested only in softer topics, but I think that the new focus on sustainability may inspire many young, talented women to consider a career in energy.”

[Kadri Simson, Commissioner for Energy](#)

Yet, the potential for young women in green technology jobs is blocked by persisting gender stereotypes. Women are less likely to hold decision-making positions in the energy sector. According to the [International Energy Agency](#): *‘On average, there are 76% fewer women than men working in the energy sector, a significant difference from the average 8% gap seen in the total workforce, according to 2018 data from 29 countries (including 22 IEA members)’*.

The absence of women in energy policy and strategy planning decreases the likelihood that women’s interests and needs are accordingly taken into account³¹. On the one hand, women are more likely to support ambitious climate and energy policies³². Women need energy poverty to be addressed as they are more likely to be poor and suffering from energy poverty³³.

Sustainable products

Creating sustainable products is important in making the most of the limited resources we have. Also from a user perspective, sustainability is particularly useful to reduce the cost of products by expanding their usage time. There is a clear socio-economic dimension to creating sustainable products. It would be beneficial to the economy and our society if the concept of sustainability in products also were to incorporate the principles of universal design needed to create an inclusive world for people with disability. Universal design means that no separate products should be created for people with disabilities, but that all products created are designed in a way that people with disabilities can equally use them³⁴. Doorknobs is a good example; the COVID-19 pandemic showed us that many doorknobs cannot be opened with an elbow. Universal design principles are also important for elderly people who often lack the strength or have some other sensory deprivation that render certain items hard to manage. There is an entire range of products that have

³¹ International Renewable Energy Agency (IRENA). (n.d.). Renewable energy: A gender perspective. <https://www.irena.org/gender/Initiatives/Renewable-energy-A-gender-perspective>

³² International Energy Agency (IEA). (n.d.). Energy and Gender <https://www.iea.org/topics/energy-and-gender>

³³ European Economic and Social Committee (EESC). (2018, March 8). Energy poverty: Women more likely to be affected than men. <https://www.eesc.europa.eu/en/news-media/news/energypoverty-women-more-likely-be-affected-men>

³⁴ Design for All approach: Accessibility standards resulting from Commission Mandates 376, 554, 420 and 473.

a history of being developed for people with a disability and turned out to be a major breakthrough for all humanity, like e-mail, sub-titles, and a typewriter.³⁵

Designing and manufacturing sustainable products presents huge opportunities for advancing equality. However, this requires that product designers be properly informed about universal design principles and are supported to apply them to their products.

2.5 Fisheries

In June 2021, the Commission adopted the Communication “[Towards more sustainable fishing in the EU: state of play and orientations for 2022](#)”. [Council Regulation 2022/1670](#) sets quota for certain fish stocks. The [European Maritime, Fisheries and Aquaculture Fund \(EMFAF\)](#) can help finance investments in the fishing sector.

The fishing industry is a highly gendered sector³⁶ in terms of roles and access to power. Women’s work and needs are generally invisible and need to be taken onboard in the transition. Mainly men work on boats and women do the work on land, but traditionally this was often done for free by the wife of the boat owner. As such these are many family business enterprises, where women are the most vulnerable link in the production chain, often not paid and socially not protected.

The Food and Agriculture Organization (FAO) calculated that approximately 60 million people indirectly or directly work, either full or part time, in the primary sector of fisheries and aquaculture worldwide, of which 14% are women³⁷. However, women’s work in fisheries is often invisible and considered part of their care duties to be done for free, such as beach cleaning, net repair, etc. When taking these post-production tasks into account, women have been found to constitute half of the global fishing workforce³⁸. Most of the catch that is obtained by women is intended for feeding their families or sold locally, whereas most of the catch that is obtained by men enters the market³⁹. All this puts women in a more vulnerable and economically dependent situation and the transition needed in fisheries risks excluding women if their contributions remain invisible⁴⁰.

³⁵ Bodine, Cathy. Assistive Technology and Science. 2013.

³⁶ European Parliament research Service, Topical Digest Women in Fisheries, 2021. See also: <https://epthinktank.eu/2021/10/15/women-in-fisheries/>

³⁷ FAO (2020). The State of World Fisheries and Aquaculture 2020. Sustainability in Action. Rome: Food and Agriculture Organization of the United Nations.

³⁸ [Teh and Sumaila, 2013](#), [World Bank, 2012](#); [FAO, 2020](#); see footnote 18.

³⁹ See footnote 38.

⁴⁰ Role of women must be reinforced in EU marine policies: WWF policy brief, 2019.

Migrant workers might also be employed on the boats and run the risk of being exploited for cheap labour, as the fishing industry is under stress from decreasing fish stocks and quota⁴¹. Overfishing and declining fish stocks is a significant issue in relation to decent work in fishing, as there seems to be a direct link between overfishing, declining fish stocks and the use of forced labour on board fishing vessels in some parts of the world⁴². With a heavy pressure on the margin of profit (hardly any in the current energy crisis⁴³) there is a danger that the most vulnerable people in the fishing industry run the highest risk of exploitation, i.e., women and migrant workers. This means the transition envisaged by the EU Green Deal needs to be done in a way that also empowers vulnerable groups in the fishing industry and makes their contribution more visible.

2.6 Land use, agriculture, and forestry (LULUCF)

The EU Land Use and Forestry sector, the so-called LULUCF sector, covers the use of soils, trees, plants, biomass, and timber, and absorbs more CO₂ than it produces. Thanks to the ability of plants and trees to absorb CO₂ from the atmosphere, the sector acts as a net carbon sink. The overall objective of the EU framework strategy for land use is to remove as much CO₂ as possible from the atmosphere by capturing CO₂ in soil and forests. This will contribute to reaching carbon neutrality by 2050.

In November 2022, the EU Commission reached a provisional deal with the European Parliament and Council on a [Strategy regarding Land Use, Land Use Change and Forestry \(LULUCF\)](#). In April 2023, the Council and the European Parliament reached political agreement. Once formally adopted and published in the Official Journal, the new provisions will become law.

In May 2020, the [European Farm to Fork Strategy](#) was presented as part of the EU Green Deal. It intends to transform the way food is produced and consumed, to reduce the environmental impact of food systems, improve resilience against crises and ensure healthy and affordable food for all, including future generations.




Several legislative initiatives implementing the [Farm to Fork Strategy](#) are being prepared in the following areas:

- Ensure sufficient, affordable, and nutritious food within planetary limits (Sustainable Food Systems Framework)
- Halve the use of pesticides and fertilisers and sales of antimicrobials
- Increase the amount of land devoted to organic farming
- Promote more sustainable food consumption and healthy diets

⁴¹ Protecting migrant workers from exploitation in the EU: workers' perspectives; https://fra.europa.eu/sites/default/files/fra_uploads/fra-2019-severe-labour-exploitation-workers-perspectives_en.pdf and <https://www.ilo.org/global/topics/forced-labour/policy-areas/fisheries/lang--en/index.htm>

⁴²International expert meeting on labour exploitation in the fishing sector in the Atlantic region Background paper An international conference Oslo, Norway, 25-26 November 2015 . https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_429048.pdf

⁴³See presentation of an event on the issue organised by the European Parliament. 2022.

-  Reduce food loss and waste
-  Combat food fraud in the supply chain
-  Improve animal welfare

Similarly to fisheries, the agricultural transition presents risks for the people working in the agricultural sector. The pattern of monoculture crops, pesticide use and high concentrations of nitrates in the soil is harmful to human health⁴⁴. A move is also required away from cattle towards crops. In short, because of the EU Farm to Fork Strategy as part of EU Green Deal, a new type of farming will emerge, and this transition will have a deep impact on the lives of people working in this industry. Just as with fisheries, the role of women in agriculture is often overlooked, their work invisible and unpaid. Only 30% of farms in Europe are owned by women and the farm size is smaller⁴⁵. Similarly, people with a migrant background are often used as seasonal labourers in this industry and at risk of labour exploitation⁴⁶.

The issue of food security will also be impacted by the EU Green Deal. The Ukrainian war with the subsequent blocking of cereal transport to the rest of the world was a wakeup call to realise how vulnerable we all are with regards to food security. Rising food prices because of the energy crisis in combination with the war, mean that families on the brink of poverty, now risk tumbling below the threshold⁴⁷.

Hunger is becoming part of certain children's lives in Europe, many of whom now go to school with empty lunch boxes⁴⁸. Even if these are filled, it is not always with healthy food. Paradoxically fast food is rich in sugars and fats and is cheaper than nutritionally healthier foods such as fruit and vegetables. As previously mentioned, it is the most vulnerable that face the highest risk of falling below the poverty threshold and thus being confined to unhealthy food consumption. This, in turn, will negatively affect their health. The agricultural transition must promote healthy and affordable food⁴⁹.

While the transition to a more environmentally friendly food system will generate new business opportunities, it is important that the long distance gap between farm to fork is closed. Healthy

⁴⁴Alengebawy, A., Abdelkhalek, S. T., Qureshi, S. R., & Wang, M. Q. (2021). Heavy metals and pesticides toxicity in agricultural soil and plants: Ecological risks and human health implications. *Toxics*, 9(3), 42.

⁴⁵European Gender Equality Strategy

https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/gender-equality/gender-equality-strategy_en

⁴⁶Protecting migrant workers from exploitation in the EU: workers' perspectives; https://fra.europa.eu/sites/default/files/fra_uploads/fra-2019-severe-labour-exploitation-workers-perspectives_en.pdf

⁴⁷EU Commission EU Science Hub: Inflation increases poverty unevenly, widening gaps across the EU; 2022. https://joint-research-centre.ec.europa.eu/jrc-news/inflation-increases-poverty-unevenly-widening-gaps-across-eu-2022-12-06_en

⁴⁸Zaçe, D., Di Pietro, M. L., Caprini, F., De Waure, C., & Ricciardi, W. (2020). Prevalence and correlates of food insecurity among children in high-income European countries. A systematic review. *Annali dell'Istituto Superiore di Sanità*, 56(1), 90-98.

⁴⁹Nutrition quality of food purchases varies by household income: the SHoPPER study. Simone A. French, Christy C. Tangney, Melissa M. Crane, Yamin Wang & Bradley M. Appelhans *BMC Public Health* volume 19, Article number: 231 (2019).

locally produced food should be made available at affordable prices, also for elderly people or people with disabilities that lack the means to afford biological food or the ability to collect it at their local bio-farm.

The use of biomass from forests (and agriculture or waste products) as a source of energy is an important part of the renewable energy goal of the EU Green Deal. There is, however, growing debate⁵⁰ on whether the current dependency of almost 60% of Europe's renewable energy from biomass, and especially the use of pellets⁵¹ for heating, is in line with the EU's own decarbonisation strategy. EU forests represent a carbon sink while unsustainable forestry for biomass damages these ecosystems. It is therefore important to recognise who will be affected by future policy changes aiming at sustainable forestry.

Without long term priorities, stakeholders cannot plan and invest for the future and inequality is likely to rise. They will need support in this transition, such as receiving rewards for protecting and enhancing forests.

At present, forestry in Europe is often used for wood production, both as building material and as a source for biofuel. The use of wood as biofuel (for wood stoves or pellet stoves) is highly problematic as the burning process releases all the CO₂ that was captured by the tree back into the atmosphere, while the aim of becoming CO₂ neutral is precisely to capture excess CO₂. Currently, growing trees is one of the fastest natural ways of doing that. However, with the rising energy prices, many people — and especially poor people — risk going back to burning wood for heating during winter⁵². Future European initiatives aimed at reducing the use of wood as biofuel should be part of a comprehensive energy plan that provides cheap and sustainable alternatives for people living in poverty.

⁵⁰ Mongabay. (2022, September 29). EU votes to keep woody biomass as renewable energy, ignores climate risk.

<https://news.mongabay.com/2022/09/eu-votes-to-keep-woody-biomass-as-renewable-energy-ignores-climate-risk/>

⁵¹ Bastin, J.-F., Finegold, Y., Garcia, C., Mollicone, D., Rezende, M., Routh, D., . . . Crowther, T. W. (2019). The global tree restoration potential. *Science*, 365(6448), 76-79. doi: 10.1126/science.aax0848

⁵² Central Eastern European of Sustainable Energy Network, April 2022.: Fuel of the poor - household biomass use in Bulgaria, Hungary, and Romania.

2.7 Road transport

Decarbonisation of transport is a key objective of the EU Green Deal: new legislation focuses on (1) electrification of vehicles, (2) biofuels, and (3) public transport.

As from 2027, emissions from road transport will be included in a separate new European Emission Trading System (ETS). An agreement was reached in April 2023 [ensuring all new cars and vans registered in Europe will be zero-emission by 2035](#) (with an exception for E-fuels, to be regulated later). As an intermediary step towards zero emissions, the new CO2 standards will also require average emissions of new cars to come down by 55% and new vans by 50% by 2030.⁵³

After formal adoption and publication in the Official Journal, these provisions will become law. To avoid vulnerable sections in society to be left behind, a special fund is created to allow Member States to compensate for the rising costs of transport. See below for more details on the creation of a Social Climate Fund, agreed by the European Parliament and the European Council on April 25th 2023.

Public transport is a priority in the EU Green Deal to reach net zero in 2050. The Social Climate Fund provides opportunities for Member States to guarantee equal use of public transport. See more in section 2.8.

Mobility is a basic social need and an important aspect of economic activity. EU Green Deal measures to reduce transport-related carbon emission will potentially have an important impact on equal participation and equality.

The excessive cost of electric vehicles (EV) presents an economic barrier for many people. Even though such vehicles are more accessible, people with disabilities often cannot afford them.

“Buyers who live in single-family houses with garages might have little problem installing their own chargers. For everyone else, charging will be less straightforward. EV owners who live in apartment buildings and park on the street will rely heavily on public chargers—in 2021, 42 percent of European EV owners living in cities had no access to home charging points. They might well fear that competition for access to those public chargers will be fierce. An equitable rollout of charging infrastructure calls for installing public charging points in all neighbourhoods.

The broader challenge is that public charging today is 30 to 200 percent more expensive than private charging. Ensuring a fair charging price for EV owners

⁵³ See also: https://energy.ec.europa.eu/topics/renewable-energy/bioenergy/biofuels_en

who do not have access to private charging points at home or at work will be extremely important in the transition to an all-electric Europe.”⁵⁴

Under the EU Green Deal, existing EU funding should be channelled to transitioning to zero-emission vehicles and related technologies, and especially towards SMEs (Small and medium enterprises) along the automotive supply chain and vulnerable regions and communities.

Because of the difficulty to electrify heavy duty vehicles and aviation, the EU Green Deal promotes the use of biofuels for these types of transportation as an alternative solution. Biofuels serve as an alternative for existing vehicles that run on fossil fuels. Biofuels grow on land that was formerly used for agriculture to grow food or feed. For more information on the equality impacts of land use changes, see the section on land use, agriculture, and forestry above.

Often public transport infrastructure is not considered a safe space for elderly people, women, racialised people and the LGBTQI+ community, and is thus not accessible. Fear of being bullied and harassed is a reality that keeps people away from public transport at certain times of the day or night.

Public transport takes place in a space where stereotypes influence people’s (often discriminatory) behaviour, which leads to certain people censoring themselves from its use⁵⁵. The cost of racial discrimination in public spaces and on public transport is often underestimated and the risk is even increasing through use of video technology in public space. According to EU Parliamentary research, “there is a risk that existing biases will be hard-wired into new, increasingly central technologies, such as artificial intelligence (AI) algorithms, causing further harm. This is because the historical and governmental data used for training AI reflect cultural biases and stereotypes.”⁵⁶

Additionally, the transition towards promoting public transport does not take the issues of accessibility into account often enough, such as for people with disabilities or people living in certain geographical areas⁵⁷. For example, people who live in remote or rural areas are often not well served by public transportation, which results in them needing private vehicles. Even within cities, certain areas may be less well served than others; this creates a vicious cycle in which poorer neighbourhoods or racially segregated areas lack public transport services that are dependable and

⁵⁴ Europe’s EV opportunity—and the charging infrastructure needed to meet it; November 4, 2022; By Julian Conzade, Florian Nägele, Swarna Ramanathan, and Patrick Schaufuss, McKinsey: <https://www.mckinsey.com/industries/automotive-and-assembly/our-insights/europes-ev-opportunity-and-the-charging-infrastructure-needed-to-meet-it>

⁵⁵For example, see the EuroCities project: <https://eurocities.eu/latest/stopping-sexual-harassment-on-public-transport/> and European Parliament Study: Women and transport, 2021.

[https://www.europarl.europa.eu/RegData/etudes/STUD/2021/701004/IPOL_STU\(2021\)701004_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2021/701004/IPOL_STU(2021)701004_EN.pdf)

⁵⁶European Parliamentary research service: page 2: EU legislation and policies to address racial and ethnic discrimination, 2021.

[https://www.europarl.europa.eu/RegData/etudes/BRIE/2021/690525/EPRS_BRI\(2021\)690525_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2021/690525/EPRS_BRI(2021)690525_EN.pdf)

⁵⁷Heinrich Böll Stiftung Brussels: making mobility accessible to all, 2022 <https://eu.boell.org/en/2022/05/02/making-mobility-accessible-all>

frequent, making it harder for the residents to get to work or school, for example, or results in them needing their own transportation, which is much more expensive (and less sustainable)⁵⁸.

Moreover, sustainable public transport tickets are not affordable for people in poverty, pushing them into making environmentally unfriendly decisions to buy aeroplane tickets for short trajectories because train tickets are not affordable. The cheapest options are often not environmentally friendly, such as planes versus trains⁵⁹.

2.8 Financial compensation: social climate fund and ETS revenues

EU Green Deal measures aim to cut carbon emissions. Under the Emission Trading System, a market for carbon emission rights was created. Since 2005, heavy emitters must buy emission rights, according to the polluter pays principle. As the total amount of European emission will be reduced on a yearly basis, the cost of emission rights rises progressively. The European Parliament and the European Council recently reached an agreement to expand the ETS to maritime transport and aviation, and create a new separate ETS for road transport, commercial buildings, and certain industrial sectors. This will force industries and energy companies to invest in energy saving and renewables to limit energy use and costs but may also lead to energy and mobility poverty among the most vulnerable households⁶⁰.

The 2019 “[yellow vest protests](#)” in France showed that socially vulnerable people find it unjust that they should carry the weight of climate policy. The EU reached political agreement on the creation of a special [Social Climate Fund](#) for the period 2027-2032 to allow Member States to compensate for rising costs for the use of transport and heating and insulation of buildings. On 18 December 2022, a political agreement was reached on €86.7 billion. The European Parliament and European Council reached agreement on the Social Climate Fund on [April 25th 2023](#).

The Social Climate Fund is intended to support measures and investments that reduce emissions in road transport and buildings sectors and as a result reduce costs for vulnerable households, micro-enterprises, and transport users. It will also be able to provide temporary direct income support for vulnerable households covering up to 37% of the national Social Climate Plans. It will start operating

⁵⁸Porru, S., Misso, F. E., Pani, F. E., & Repetto, C. (2020). Smart mobility and public transport: Opportunities and challenges in rural and urban areas. *Journal of traffic and transportation engineering (English edition)*, 7(1), 88-97.; Padeiro, M., Louro, A., & da Costa, N. M. (2019). Transit-oriented development and gentrification: a systematic review. *Transport Reviews*, 39(6), 733-754.

⁵⁹ European Environment Agency: Motorised transport: train, plane, road, or boat — which is greenest? 2021.

<https://www.eea.europa.eu/highlights/motorised-transport-train-plane-road>

⁶⁰ European Commission. (n.d.). Energy poverty. https://energy.ec.europa.eu/topics/markets-and-consumers/energy-consumer-rights/energy-poverty-eu_en

in 2026, before the entry into force of the new ETS for transport and building and will be financed by €65 billion from the EU budget, plus 25% co-financing by Member States⁶¹.

Member States will be also able to use part of the revenues of the ETS to finance measures and investments in energy efficiency of buildings, decarbonisation of heating and cooling of buildings, renewable energy and access to zero- and low-emission mobility and transport.

It is important that Member States use the ETS revenues and the Social Climate Fund to finance measures and investments in a targeted manner that principally benefit vulnerable households, micro-enterprises, or transport users, instead of blanket, horizontal subsidies. These instruments are a good start to help share the financial burden of climate action more fairly. Experts fear, however, that it may not be enough to fully compensate for increased costs of heating and transport for the most vulnerable people⁶². Equality Bodies can use their expertise to especially advocate for the interests of disadvantaged groups, such as women, racialised people, migrant workers, elderly people, people with disabilities, people in poverty and LGBTQIA+ people, when allocating these funds.

⁶¹ European Commission. (2022, April 6). Commission presents new strategy for the rights of the child. https://ec.europa.eu/commission/presscorner/detail/en/ip_22_7796

⁶² Context.News. (2021, July 22). Can EU's new social climate fund protect poor from carbon cost? <https://www.context.news/just-transition/can-eus-new-social-climate-fund-protect-poor-from-carbon-cost>



3. Equality Bodies and the EU Green Deal

3.1 Equality Bodies

European Commission President von der Leyen said in the [State of the Union address](#) in 2020: “I will not rest when it comes to building a Union of Equality.” In order to make this union of equality a reality, each Commission department has persons responsible for coordinating equality mainstreaming with a task force and an equality focal point. Their role is to ensure that equality is mainstreamed in all EU policies. A European Commissioner for Equality is assisted by the [European Union Agency for Fundamental Rights](#) (FRA) and the [European Institute for Gender Equality](#) (EIGE), who are responsible for collecting data and advising EU institutions on equality issues. At the Member State level, a variety of institutions exist who work on the promotion of equality such as [Equality Bodies](#), set up according to EU legislation to promote equality and assist victims of discrimination. They play a key role in equality mainstreaming, for example by advising policymakers.

Equinet assembles these Equality Bodies into a European network. The national institutions facilitate the flow of information regarding discrimination at the national level. The primary role of Equinet is to collect and share information regarding equality and non-discrimination, to improve practices of each national Equality Body. The EU Equality Directives state that Member States should set-up one or several Equality Bodies tackling at least discrimination based on gender and race⁶³, and that they exchange relevant information with European bodies⁶⁴. However, many Equality Bodies also work on other grounds of discrimination, such as sexual orientation, disability, or religious beliefs, to name a few. In December of 2022, the European Commission proposed [new legislation](#) on standards for Equality Bodies, requiring that their mandate also covers discrimination in employment on the grounds of age, disability, religion or belief and sexual orientation at the least. [Equinet’s research](#) makes the case for further discrimination grounds, such as socio-economic disadvantage, to be included in legislation and this is already the case in several countries.

Seen as the experts on non-discrimination and equality, Equality Bodies advocate for these values in a variety of ways. This is done, for example, by spreading awareness, defending the legal rights of victims of discrimination, conducting research, making recommendations to policy makers in respective countries, and working with other organisations to develop proper equality practises.

There are many ways for Equality Bodies to combat inequality on a national level. This gives them numerous opportunities to educate the public on possible pitfalls that legislation might have on

⁶³ European Commission. (n.d.). Equality bodies. https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/combating-discrimination/tackling-discrimination/equality-bodies_en

⁶⁴ European Commission. (2022). Commission recommendation on standards for equality bodies [PDF]. https://commission.europa.eu/system/files/2022-03/commission_recommendation_on_standards_for_equality_bodies.pdf

vulnerable groups in the population. The ever-growing issues of climate change and how to combat it present us with new challenges in ensuring a just and equal future for everyone. This provides Equality Bodies with many opportunities to intervene on a national, regional, and local level and ensure that legislation that will be created on the basis of the EU Green Deal objectives will be inclusive and non-discriminatory.

3.2 Survey results

To gather information on the current practices of the Equality Bodies, and whether addressing the effects of climate change on equality is already part of their work, a survey was distributed to the Equality Bodies in the entire Equinet network (including Equality Bodies from the EU and other European countries). The survey was made using Google Forms and completed online. The list of survey questions can be found below in Annex 1.

The survey was prepared by the authors and distributed via email by the Equinet Secretariat at the beginning of October 2022. The survey was closed at the end of November. Results were obtained from 12 Equality Bodies. The following countries were represented: Malta (2x), Lithuania, Portugal, Austria, France, Czechia, Latvia, Croatia, the Slovak Republic, Great Britain, and Belgium. In this section, the responses to the survey are presented and analysed.

The survey was completed by 12 Equality Bodies. There are 47 Equality Bodies in the Equinet network, which means the survey was completed by 25% of Equality Bodies represented at Equinet.

The first section of the survey consists of questions regarding the mandates of the Equality Bodies, and whether any Equality Body has encountered climate change as a cause of inequality to date. Because this report considers socio-economic status to be a ground of discrimination, we asked Equality Bodies whether this falls under the scope of their organisation's work.

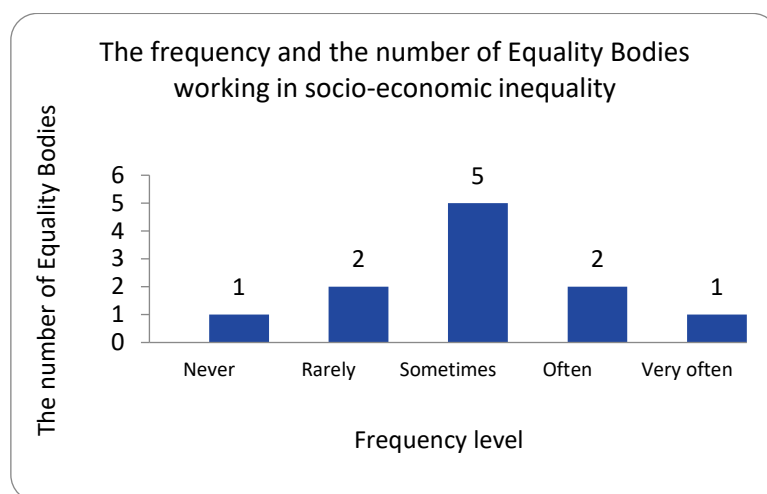


Figure 1: Is socio-economic inequality part of the scope of your organisation's work?

As depicted in the graph above, over half of the respondents indicated that socio-economic class is on their radar and is – to some degree – part of their organisations’ work. Additionally, half of the respondents indicated that they had never encountered climate change as a cause of inequality to date. This provides valuable information on the current practices of the Equality Bodies as they relate to this report.

The second section of the survey covers different sectors of the EU Green Deal and aims to provide insight into the extent to which they are considered priorities by each Equality Body. The following charts depict the responses for each sector.

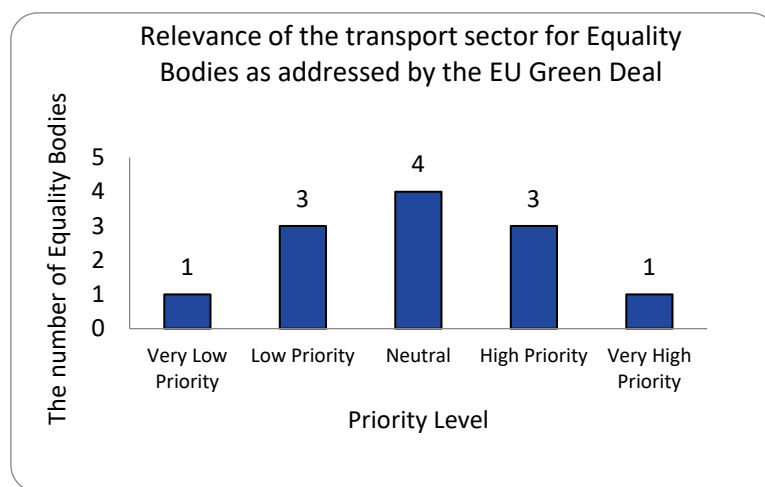


Figure 2: How relevant is the transport sector for your Equality Body as addressed by the EU Green Deal?

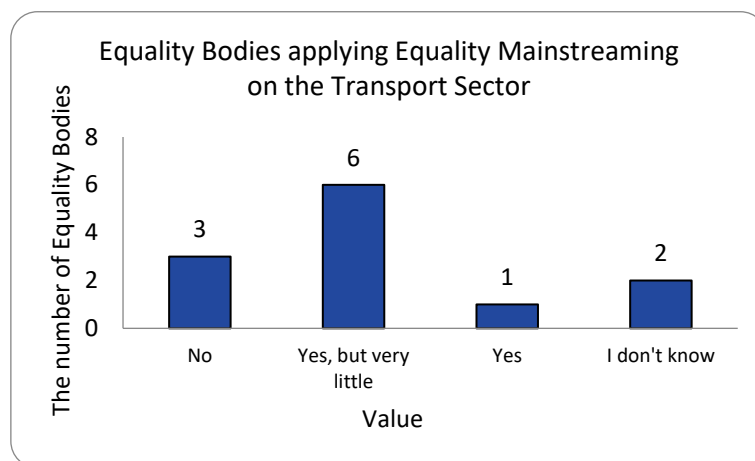


Figure 3: Do you currently do any equality mainstreaming of your government's policy on transport?

Most Equality Bodies do not consider transport a very high priority. It is important that public transport and urban mobility plans include conditions for safe use and access for all, especially women, young people, old people, marginalised groups, etc. The survey results show that Equality

Bodies have limited experience with the promotion of equality in their respective governments' policies on transport, as only one Equality Body responded that they have done so in the past.

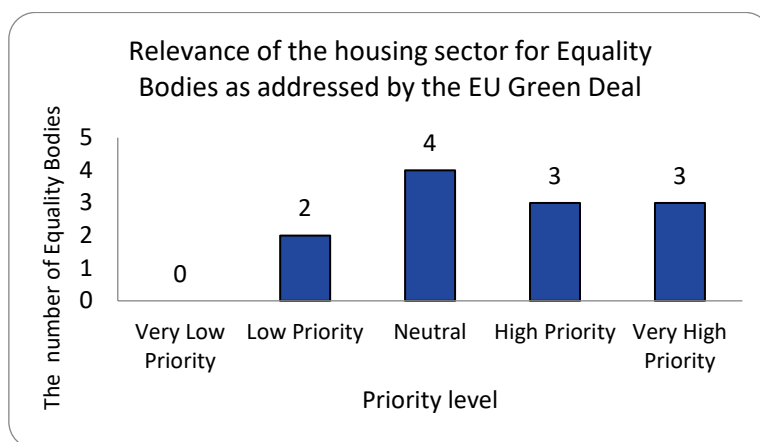


Figure 4: How relevant is the housing sector for your Equality Body as addressed by the EU Green Deal?



Figure 5: Do you currently do any equality mainstreaming of your government's policy on housing?

Housing is a high priority for most Equality Bodies. Only two respondents indicated housing to be a low priority, with the remaining responses to either be neutral (1/3) or high to very high priority (1/2). In contrast to transport, most Equality Bodies (83%) have experience in equality mainstreaming their government's policy on housing. Housing is a common issue when discussing inequality and discrimination, which means most Equality Bodies have experience with it.

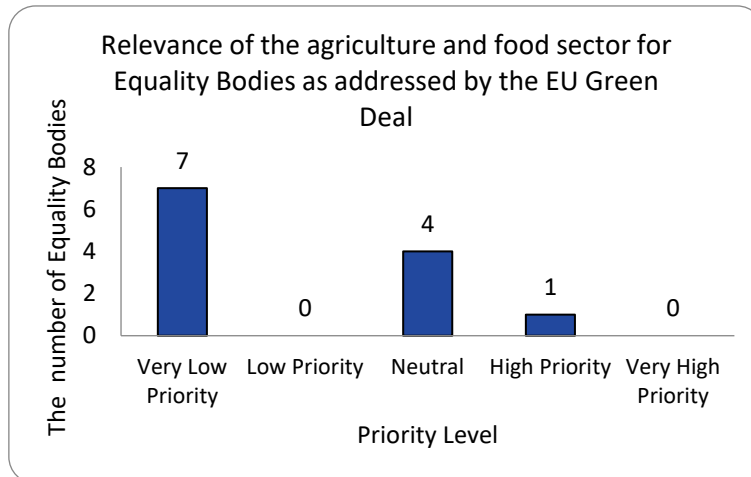


Figure 6: How relevant are the agriculture and food sectors for your Equality Body as addressed by the EU Green Deal?

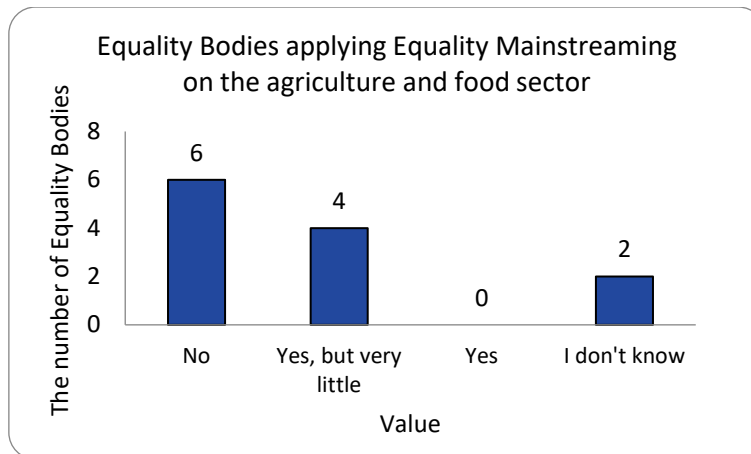


Figure 7: Do you currently do any equality mainstreaming of your government's policy on agriculture and food?

As the graph indicates, agriculture and food are not a high priority for most Equality Bodies. In the same vein, Equality Bodies do not have much, if any, experience with promoting equality in this domain. This domain will likely undergo many transformations as a result of the EU Green Deal, so it is important to ensure policies regarding this sector do not affect specific vulnerable groups disproportionately.

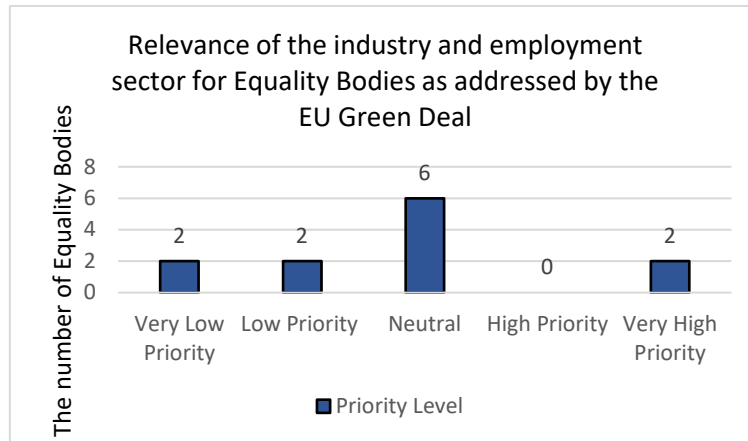


Figure 8: How relevant are the industry and employment sectors for your Equality Body as addressed by the EU Green Deal?

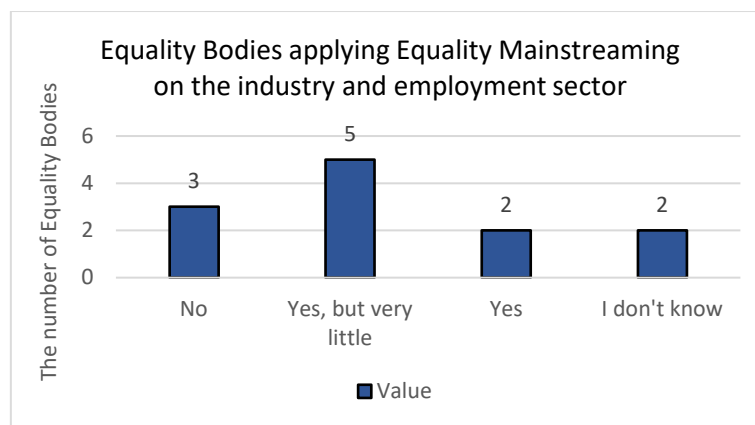


Figure 9: Do you currently do any equality mainstreaming of your government's policy on industry and employment sector?

Half of the respondents indicated that industry and employment are of neither low nor high priority for them. Only two Equality Bodies consider industry and employment to be a (very) high priority. Industries that are heavily dependent on fossil fuels will be affected by EU Green Deal policies and it is therefore important to be involved in equality promotion in relevant policy making. At the time of completing the survey, most Equality Bodies are not very involved in this.

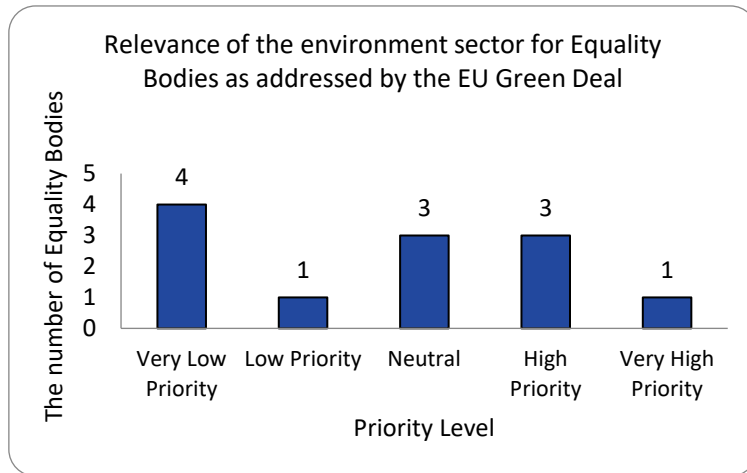


Figure 10: How relevant is the environment sector for your Equality Body as addressed by the EU Green Deal?

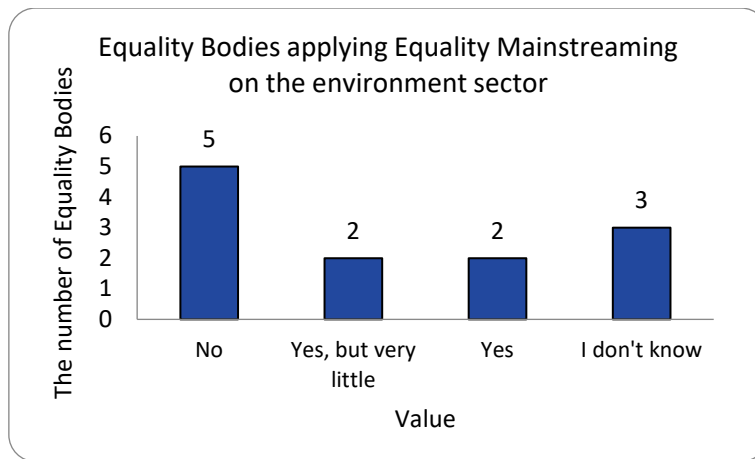


Figure 11: Do you currently do any equality mainstreaming of your government's policy on the environment sector?

The responses on whether “environment,” including air, water, and soil pollution, is a priority to the Equality Bodies are very divided. However, the majority of the Equality Bodies responded that the environment is either a (very) low priority, or neutral. Additionally, 55% of respondents reported that they have never been involved in equality mainstreaming on their national government’s environment policies.

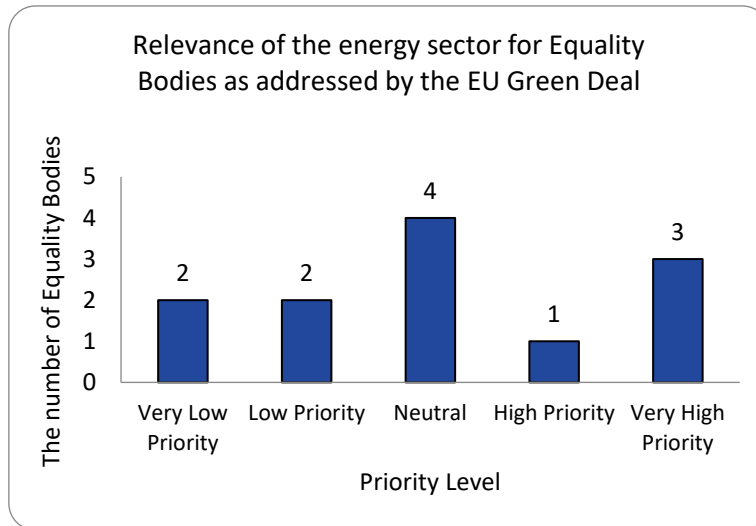


Figure 12: How relevant is the energy sector for your Equality Body as addressed by the EU Green Deal?

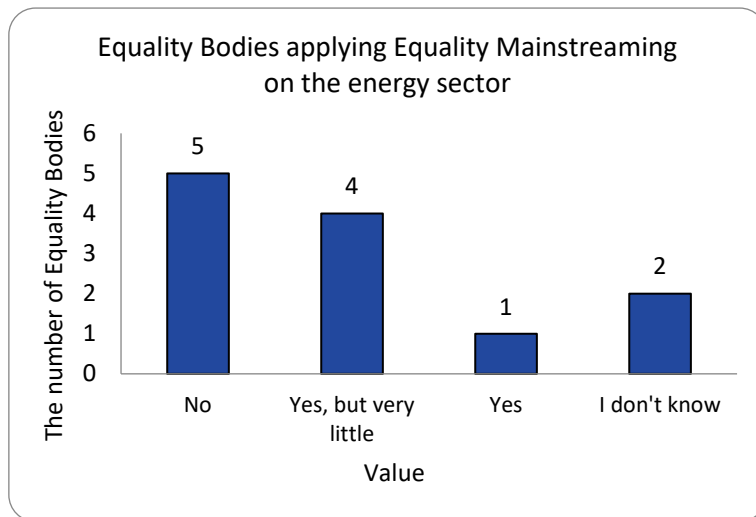


Figure 13: Do you currently do any equality mainstreaming of your government's policy on the energy sector?

The domain of energy is extremely broad and can include an affordable energy supply or energy efficient buildings, for example. Energy is also considered to be a high priority to some Equality Bodies but a low one to others, which makes it difficult to make an overall statement as to the priority status of energy. Equality Bodies also report that they either have none, or very little experience with equality mainstreaming for energy.

The third part of the survey pertains to the opportunities for interventions by the Equality Bodies. When asked whether any Equality Body is already involved in any project related to climate change, such as by raising awareness, monitoring, and advising on law and policy, or advocating for victims of discrimination, one third of respondents had no experience with any such cases or projects. The chart below illustrates the responses, in which only two Equality Bodies have experience with climate change related projects.

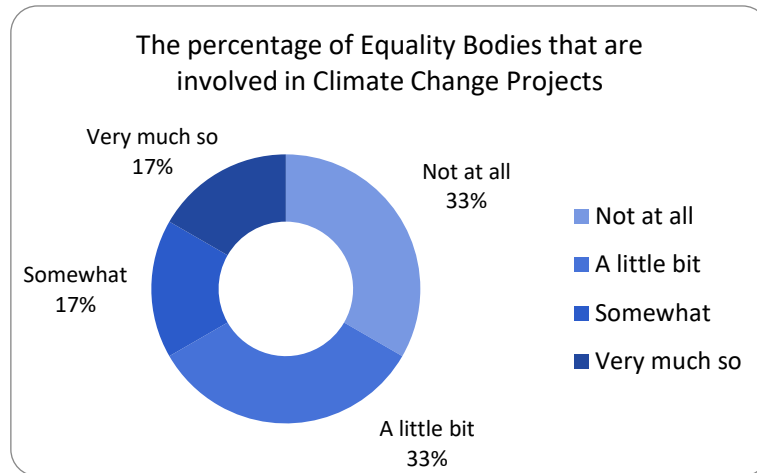


Figure 14: Are you involved in any activities or projects related to climate change in your organisation? (E.g., raising awareness, monitoring, and advising on law and policy, advocating for victims of discrimination)

Some examples were given to demonstrate involvement with such projects. Currently, this appears to happen primarily through spreading of information and awareness, such as through newsletters or special campaigns, commissioning research reports, treating individual complaints, and advising on laws and policies. This will be relevant for Equality Bodies when working to ensure that future climate policy is equal, non-discriminatory and takes into account the vulnerability of certain groups. For more examples of good practice cases, see chapter 4.1 below.

The last section of the survey refers to the potential future role of Equality Bodies. We asked Equality Bodies which activities they could undertake, and responses included raising awareness, incorporating gender mainstreaming in public policies, involvement in public discussion, and advocating for inclusive climate change policies. However, 64% responded that they were not aware of the role that Equality Bodies can play, which means it is especially important to clarify how Equality Bodies can be involved in the future. In addition to this, some expertise on equality and climate change is required to set up campaigns to advise policy or drive the public discussion. Only one Equality Body responded that they had “quite a bit” of expertise, with the remainder indicating that they had none, a little, or only some expertise on the topic at the current moment (see graph below). However, should any material or training be made available to the Equality Bodies, 75% of respondents stated that they would be willing to use these. This provides many opportunities for Equinet to facilitate the sharing of knowledge and materials on the subject. For example, Equality Bodies have indicated that they are interested in hearing about how other Equality Bodies tackle the issue.

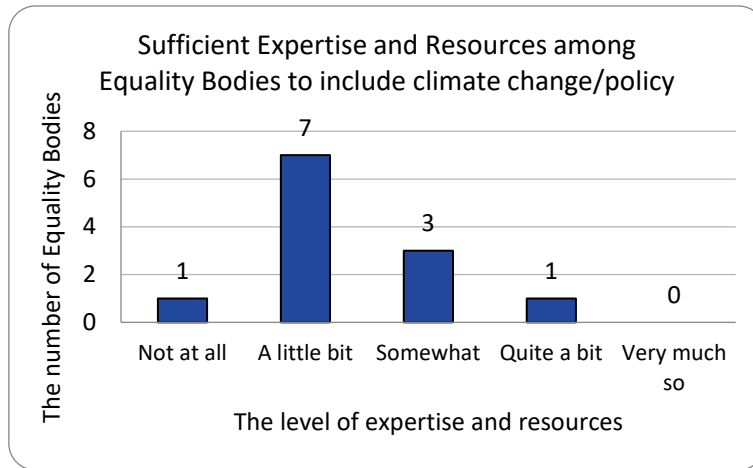


Figure 15: Do you feel you have sufficient expertise and resources to include climate change/policy in your work?

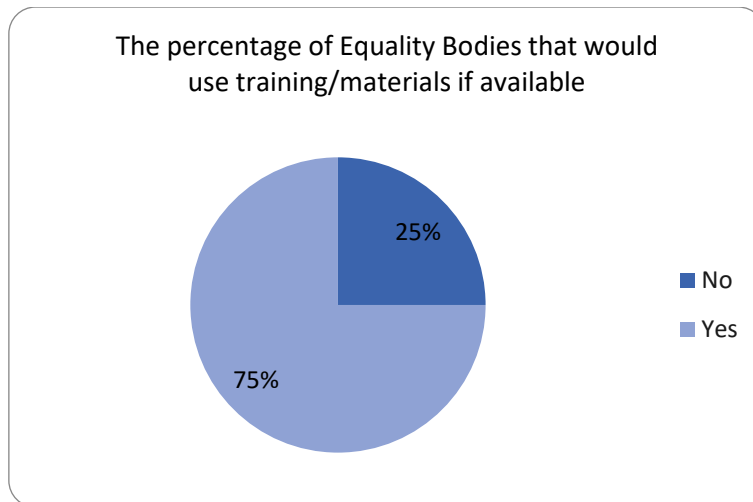


Figure 16: Would you use training/materials if available?

Overall, the survey revealed that yet, Equality Bodies have not encountered climate change to be a cause of inequality. There is limited involvement with related projects, and any existing related work primarily includes the dissemination of information and awareness. When asked about the level of priority that sub-sections of the Green Deal have, such as agriculture and energy, housing holds the highest priority for Equality Bodies. The main takeaway from the survey is that most Equality Bodies are unaware of the role they can play regarding climate change, the EU Green Deal, and inequality in Europe. The first task for the Equinet secretariat is to clarify and elucidate the potential function Equality Bodies can have in shaping, advising, and implementing non-discriminatory policies regarding climate change in Europe.

3.3 Interview results

In addition to the survey, interviews were conducted with members of a selected group of Equality Bodies. These organisations were contacted because they had either expressed their willingness to

participate in an interview during the survey, were contacted directly by external consultants, or were suggested by the Equinet secretariat. The main criteria for selection were their regional coverage across Europe and good practice cases related to equality and the EU Green Deal.

In total, seven interviews were conducted with people from six different Equality Bodies and spread over five countries. In addition to interviews with the Equality Bodies directly, one interview was conducted with a person working at the European Commission working on gender and the EU Green Deal. The interviewees have requested to remain anonymous in the report, but their names are known in the Equinet secretariat. Some important insights have been brought to light from the interviews, allowing us to go more in-depth into the topics touched upon in the survey.

Climate issues as a driver of inequality

Interviewees were asked to which extent their organisation has encountered climate change as a driver of inequality. Later, they were also asked whether inequality because of measures taken to combat climate change (such as those proposed by the EU Green Deal) was a priority for them. The extent to which Equality Bodies have experienced climate change and climate policies in their work is limited and varies from country to country.

Quote 1:

“A lot of problems are arising in local communities, as people try to survive, and the solutions for them are not necessarily the best for the environment. It is not just about cooling the planet; it is also about warm homes and feeling safe in our communities. It is about being able to live happy and fulfilling lives. These are not just ‘nice to have,’ these are essentials that we need to fight for, in order to have an equal Europe. We need to look at and beyond the current geopolitical landscape and aspire to make Europe a truly sustainable continent. If the transition is not done in an equal way, it might cause enormous unrest.”

(Respondent EU Parliament)

Although climate issues are on the radar of some Equality Bodies, they are not a priority for most Equality Bodies at this point. The quote below showcases an example of an Equality Body who has

not prioritised climate change in its work. In fact, two Equality Bodies have indicated that they selected digitalisation as a more pressing topic, resulting in the EU Green Deal/climate change being left off the priority list for the upcoming year.

Quote 2:

"We have a number of core areas that we tend to work on: employment, children and young people, health and social care, etc. and then we have a couple of issues that will flow in and out each time we do a strategic plan. In the previous strategic plan, we had a focus on transport which we don't have anymore. So, there is often a space for something new and we were weighing up what that should be. Ultimately, we've decided to focus on artificial intelligence and digital services. [...] I heard from colleagues that it felt like the more immediate equality and human rights concern at that point. That's not to say that climate change is not an issue at all, I think there's a full recognition of that. That was why we in the strategy team were asked to keep a watching brief on it and keep an eye on what's happening in the outside world, because I think there's still an interest for it, but we just don't have the capacity to do a huge amount of work on it right now."

(Respondent Equality Body)

Expertise and resources

Overall, there is some confusion about the inequality caused by **climate change directly** (such as natural disasters like heat waves that kill more poor women - see example above) and the inequality caused by **measures to combat climate change** (i.e., the EU Green Deal). Moreover, the potential role of Equality Bodies regarding climate change and climate mitigation policies is still unclear to many of them.

Quote 3:

“So it’s not necessarily the impact of climate change itself but the impact of the solutions. They were talking about “oh, more home cooked meals, walking to school, and using reusable nappies, those kinds of things” but this is actually adding to the unpaid labour of women.”

(Respondent Equality Body)

Many Equality Bodies face challenges in addressing environmental issues due to a lack of expertise and resources. While most of them recognise the link between climate change and inequality, they may not have the necessary knowledge or tools to incorporate these issues into their work. In addition, many respondents expressed a desire for concrete examples of how climate change and related regulations would impact their work. They expressed interest in learning from the experiences of other Equality Bodies.

Quote 4:

“For me it would be very useful to see how I can ‘sell’ it to national policy makers. What arguments can I use and what examples can I give them to show the equality dimension in the EU Green Deal? That is what I need. So that means getting a lot of good practice examples and recommendations that we can use at a national level.”

(Respondent Equality Body)

Generally, Equality Bodies can take on high profile cases to set a public example of an instance of discrimination, according to their mandate. Several Equality Body members have shared that they would like to see how other Equality Bodies do this regarding climate issues and/or the EU Green Deal.

Systematic collection of data on the discrimination resulting from the EU Green Deal and its implementation by Member States is essential. Currently, such data sets are scarce. Given that Equality Bodies have mandates to work with specific grounds of discrimination and that

environmental inequality can impact all of these, it is difficult to know how to incorporate this new issue into existing frameworks.

Quote 5:

“Different Equality Bodies are founded on different legislation, we’re very much a regulator of the equality act. The way we do that is by holding public bodies to account. So if, hypothetically, there was an area that was particularly prone to flooding and we know that that particular geographical area is dominated by one ethnic group, for example, and the public body wasn’t taking steps to address flooding, we would go to the public body and ask “well, have you done an equality impact assessment of it, why are you continually choosing not to address this problem which is having a disproportionate effect on this particular group?” I think that’s one scenario where I could see it playing out - the direct impact of climate change on an individual. We call ourselves strategic regulators. So, we don’t have the resources to go after every single breach of equality and human rights law. What we do instead, and because of our legal system, we’re looking for high profile issues or make an example that other people can learn from.”

(Respondent Equality Body)

The grounds for discrimination that are addressed by Equality Bodies do not include socio-economic status. In the [relevant EU equality policies](#), socio-economic status, or poverty, is not listed among as a mandatory ground of discrimination to be addressed by Equality Bodies. However, some Equality Bodies do include social inequality and recognise the importance of considering the impacts of the EU Green Deal on economically vulnerable sections of society. Additionally, according to an Equality Body member, many Equality Bodies work with only one or two grounds of discrimination, such as gender or disability. This makes it difficult to incorporate an intersectional issue such as climate change, which often affects various grounds of discrimination simultaneously. Some respondents suggested the possibility for Member States to expand their mandate accordingly.

Quote 6:

“We’re really at the beginning in starting to think about what this could mean for us. When I see the complaints that we’re getting from people - individual complaints- then we see that there are a rising number of complaints that can be related to [climate change] measures. For example, sustainability or policy goals in this dimension. One of the examples is the low emission zone in Ghent, Antwerp, and Brussels. We’ve had quite a lot of individual cases on that; quite a lot of people reaching out to us with problems of accessibility [such as people with older cars who cannot enter such low emission zones, who cannot afford new cars]. Interestingly for us, we tackle the issue on the grounds of mainly “vermogen” in the law, wealth in English, not so easy to translate, ‘fortune’ in French. Social origin is also one of the protected grounds in Belgian law, and disability. We see an overlap. On the one hand, we have a cluster of individual cases concerning low emission zones, which have to do with accessibility etc. But on the other hand, during the energy crisis, there have been quite a lot of measures to mitigate the process and to ease out the paying of the energy bills. We have had quite a lot of complaints about that too. What we see is that people who are in a vulnerable position, especially socio-economic vulnerability - poverty - they don’t get to profit from these policies, the measures that are put forward. So, these are the 2 main things that we are confronted with at this point from individual cases.”

(Respondent Equality Body)

Involvement in policy and legislation at the national and EU level

Equality Bodies have different strategies on how to collaborate with their respective governments and civil society. Most Equality Bodies are already involved to some degree in reviewing government policies (e.g., gender mainstreaming). Two Equality Bodies mentioned they were not involved or consulted when a new climate law was drafted.

Quote 7:

“In the draft of the Climate Act, there is a proposal to create a certain expert body, which would evaluate the implementation of sectoral policies and individual adaptation and mitigation tools. But this is a purely expert body, and the climate act doesn't take into account that there should be broader participation. Or at least mechanisms to evaluate the impact of these policies on specific vulnerable groups. So, this is one of our observations about the draft and we will submit it once the legal process starts. Because we were not included in the preparation of the legal act. So, we haven't really had the opportunity to present our point of view. But we were in communication with other NGOs which were included in the participatory process. As we all want a strong climate act, our strategy here is to support the NGOs campaign about the importance of the Climate Act, to communicate our support and underline the human rights perspective and the issues which might make this legal act even better.”

(Respondent Equality Body)

In fact, more often than not, equality is an afterthought in the policy making process. Equality Bodies involved in assisting or advising policy do so predominantly on a national level. None of the representatives currently assume an active role on an EU level. This may be because Equality Bodies receive their mandate from national governments and have high workloads. However, respondents agree that including Equality Bodies' perspectives and expertise at an early stage, such as when drafting European policies, would be beneficial.

Quote 8:

'What do you think is the best strategy (on a European and national level)?'

“That is the big, big question. The best strategies and commitments have to come from all levels, from experts, from elected officials, institutions, the heads of Member States and also local policy makers. We are coming

at a 'full circle moment' in making meaningful change. For many decades, NGOs, scientists, activists, and researchers have been coming together, putting forward the facts and evidence for politicians to implement policies on. The evidence and call to action have been there for so many decades — and now is the time for a real revolution. Representation in decision-making is very important. Really looking at all the policies and that includes decision making and representations there. [An Australian study](#) that shows that the single most powerful indicator to taking ambitious climate policy measures is having more women in decision making positions. Therefore, making national parties more inclusive is very important. And then of course working with NGOs and policy makers and scientists.”

(Respondent European Parliament)

Some Equality Bodies are active in international networks such as the Global Alliance of National Human Rights Institutions (GANHRI) Caucus on Climate Change and Human Rights. Their work in advising policy making is therefore not only limited to national governments. Others also collaborate with NGOs to share their expertise.

In conclusion, most Equality Bodies are convinced there is a link with climate change and the EU Green Deal. Despite a willingness to address this, Equality Bodies do not have the means to prioritise climate related equality issues and therefore have not yet accumulated expertise or developed a convincing body of legal cases.



4. Promising practice cases and recommendations

4.1 Promising practice cases

Most Equality Bodies expressed a wish to learn from good or promising practices from other Equality Bodies because they feel unsure about how to integrate the EU Green Deal/climate change perspective into their work. In this section, we list several good practices and examples from the interviews. However, none of these strategies are ready-made solutions with guaranteed success.

(International) Collaboration with other stakeholders

Two Equality Bodies sought support from external networks and/or NGOs.

Quote 9:

“At the ENNHRI level, there is a core group focusing on human rights and climate change; our organisation is one of the members. Around the same time, in 2020 I think, GANHRI included climate change as one of the priorities for GANHRI, in the strategic plan. There was this parallel initiative on the European and GANHRI level. The GANHRI Caucus was initiated and started to function in 2021, I think. Currently it includes 33 members. I saw the membership as an opportunity to understand the topic more, to understand the processes on the global level and also European level or regional level, about how the decisions are taken and where are the interconnections with human rights, where are the opportunities for national human rights institutions to be involved or highlight the human rights perspective. From the professional point of view and also the advocacy point of view, for me, it was a chance to increase our activity to participate more in the area of climate change.”

Quote 10:

“The strategy that I tried to slowly build in this area is to communicate with NGOs which might have relevant expertise because they are working on climate issues for a longer period of time, and they have their own

experts with the required education and practise and participate in the advisory processes. This is one thing which I think could help us - to build communication and cooperation and somehow divide the roles for each of us. ... we have started to communicate and be seen as a relevant partner for these NGOs.”

Research

A second overall strategy was to try to build a body of research and use evidence-based methods to raise awareness and support legal cases. The quote below highlights the importance of reliable and comprehensive data sets on equality, which are often missing in the context of climate change and equality. Climate scientists may not necessarily consider the implications of their data on equality leading to the perpetuation of inequalities. It is essential to invest in research that takes an equality perspective to make such inequalities visible and address them effectively.

Quote 11:

“We point to the right to housing, for example, and access to water. There were extensive droughts and there was not enough water in some regions. For some municipalities, it was difficult during the summer, some of them were even without regular access to fresh water, this data we have. Also, there were several floods. It is more obvious when we work with experts’ data or studies, that even floods are related to climate change. [...] I also had a look at the legal framework whether people could ask for some financial retribution after these special weather events - catastrophes (although it’s not the definition of a catastrophe) - and we don’t have any legal protection here. Droughts, floods, and heat waves pose the challenges. We have more tropical days in our country than we were used to, and it affects vulnerable groups like seniors and children. Higher temperatures became rather standard, and it is already present in expert discourse. We can use these studies or claims that it is related to climate change but there are other aspects or domains in which it is much more difficult.”

Legal good practices: climate law

Some Equality Bodies highlighted the lack of a legal framework and the need for climate law to provide context for taking the cases of victims of climate equality to court. Some of these Equality Bodies are working towards having a seat at the table or being consulted during the development of climate legislation and policies.

Individual discrimination

Many Equality Bodies are looking for a narrative to build their legal cases in support of individual victims of discrimination. Here are some examples of their achievements.

Low emission zones

Belgium has been building a legal case to support individuals who feel discriminated against by the regulations of the 'low emission zones'. These regulations prohibit older cars from entering the city centre, thereby discriminating against individuals who can only afford older cars (see quote 6).

Roma people

Some Equality Bodies have been working on issues related to Roma people. They face many issues related to climate concerns, such as limited access to clean water and energy.

Quote 12:

"One [report] especially on Roma people and travellers. Recently, we had the opportunity to have an exchange with the members of the Committee on the Elimination of Racial Discrimination (CERD), presenting our submission in the context of the French review. In this contribution, we pointed out the systemic discrimination against Roma and "Travellers". In France, "Travellers" are confronted with discrimination in all areas of their daily lives: housing in connection with reception areas, accommodation, domiciliation, education, employment, access to health care, insurance, etc. We recalled our report published in October 2021, entitled: "Travellers": removing barriers to rights" to renew our recommendations. One of them mentions that some halting sites frequently expose Travellers' families to environmental risks that may

affect their health. According to the survey conducted by the European Union Agency, in France, 31% of Travellers reported environmental problems at their place of residence, such as pollution, soot, smoke, dust, odours or contaminated water, compared to 15% of the general population. During discussions with the Defender of Rights, the associations confirmed the alarming findings reported by the studies: halting sites near rubbish tips, railway tracks, oil centres, land contaminated with hydrocarbons, solvents, or mercury. Half of the reception areas are located near sources of pollution or polluting facilities. Finally, some are located in the direct vicinity of a Seveso site⁶⁵. The quality and quantity of these areas must be effectively implemented. In particular, the Environmental Code must be amended (article L. 512-7) so that the distance rules between an installation classified for environmental protection and a residential area are extended to reception areas. This is something quite concrete we recommended because we had some information from the NGOs with which we work a lot and meet on a regular basis, to take into account the difficulties encountered in the field, to contribute to the reflections on the proposals to amend the laws and inform about the institution's positions. So, the environment is not the only issue for Roma and travellers issues but this is an example of how we worked on it.”

This quote also emphasises the significance of connecting with individuals and NGOs in the field. Since Equality Bodies cannot be present everywhere, establishing strong networks with local NGOs and organisations is crucial. This enables them to gather stories and narratives that can serve as a basis for discrimination cases.

Pesticide use

The use of pesticides can be another avenue to link discrimination to pollution, particularly in cases where agricultural workers of low-income backgrounds are exposed to hazardous levels of pesticides.

⁶⁵ Sites where large quantities of dangerous chemicals are stored, which can pose risks to both humans and the environment (<https://ec.europa.eu/environment/seveso/>)

Quote 13:

"Some toxic pesticides used for more than 20 years in the banana plantations of the West Indies, from 1972 to 1993, are suspected of being responsible for many serious health problems in the region. One chapter of the results of a survey on overseas residents we published in 2019 is entitled « The right to health protection and a healthy environment: two major challenges to be met in the overseas territories ». Closely linked to public health issues, environmental protection is another priority for overseas residents, ranking third among the priorities to be addressed according to the survey. The problems are extremely diverse depending on the territory (chlordecone and sargassum in the West Indies, gold washing in French Guiana, drinking water and sanitation management in all the overseas territories) and raise both ecological and health challenges. We can observe that the poorest people are more vulnerable to environmental issues. We have the legal ground of discrimination on the particular economic vulnerability. We have to tackle all types of discrimination but also systemic discrimination and intersectional discrimination."

Whistle-blowers

Support for whistle-blowers is another way to encourage people to report environmental pollution or other types of neglect related to climate change. While not all Equality Bodies have a mandate for this, the concept of 'victimisation' is present in all their mandates. This means that the Equality Bodies have the power to protect these whistle-blowers from retaliation and address victimisation when whistle-blowers face adverse treatment and report discrimination, although not all European countries provide this protection⁶⁶.

⁶⁶ See for instance Article 9 of the Race Equality Directive: 'Member States shall introduce into their national legal systems such measures as are necessary to protect individuals from any adverse treatment or adverse consequence as a reaction to a complaint or to proceedings aimed at enforcing compliance with the principle of equal treatment.'

Quote 14:

"One of our other missions is to protect the whistle-blowers, in particular if they risk any retaliation when they denounce something. We do not process environmental alerts; we refer them to the National Commission of Deontology on alerts in environmental and health issues. But we had the opportunity to protect claimants who launched environmental alerts, respecting the confidentiality of the affair. It concerned employees from private companies, trade union delegates, architects, citizens, association members, auto declared as an environmental whistle-blower. They request from our institutional protection because of retaliation in connection with the alert. The type of alert are very different: it can concern water pollution, soil pollution (coming from employees of the construction industry); poor control of production (cereals, milk), poor control of the quality of water catchments, atmospheric pollution, asbestos, electromagnetic risks, health risks linked to the quality of foodstuffs, respect for health and safety conditions."

The survey results demonstrate that Equality Bodies are making efforts to explore various entry points and are gradually developing cases that can serve as good practice examples. However, the absence of a legal framework and a mandate on poverty and climate issues, presents challenges. Moreover, building solid cases requires good data, which is currently lacking in many instances.

4.2. Recommendations for Equinet

The Equality Bodies view Equinet as a valuable intermediary partner keeping them informed about the latest developments at EU level. Equinet serves as a liaison partner, helping to voice their concerns and bring them to the attention of the EU decision-makers. The recommendations for Equinet can be summarised according to the core tasks of the Equality Bodies: awareness raising, capacity building, and advocacy work.

— Awareness raising:

- Provide 'bite-sized' infographics on the EU Green Deal and climate for Equality Bodies;
- Conduct studies or distribute the existing ones to help build solid data sets;
- Send 'alerts' to Equality Bodies whenever an important piece of legislation is passed at an EU level to allow them to anticipate it on a national level.

- **Capacity building:**
 - Set up working groups, seminars, or training sessions on the EU Green Deal for representatives of the Equality Bodies. These should focus on discrimination caused by climate change or climate mitigation policies, including the EU Green Deal, and aim at the following:
 - Facilitate the exchange of good practices;
 - Exchange about the intersectional dimension (youth, health, etc.).
- **Advocacy work:**
 - Take on a liaison role between EU and Equality Bodies, gathering feedback and concerns at a Member State level and representing national voices at EU level.

4.3 Recommendations for Equality Bodies

EU level: adoption of EU Green Deal and Fit for 55 measures

Agreement on many of the Green Deal and Fit for 55 measures has only just recently been reached by the European Parliament and the European Council. At the time when this report was submitted, finally adopted legal texts of the latest measures were not available yet. The report is therefore based upon the legal texts of the latest proposals.

Raising awareness locally about the potential impact of the EU Green Deal on equality within each Member State can contribute to putting equality issues on the political agenda of responsible ministers when negotiating proposed EU measures in the EU Council. Additionally, there are opportunities for stakeholders and social groups for directly engaging with their local members of the European Parliament and sharing their concerns. Equality Bodies could play the role of facilitator in bringing the voices of stakeholders to the ministers' table.

To conduct this role, it is important for Equality Bodies to understand the potential impact of EU Green Deal measures on equality, such as rising energy and mobility poverty. They can then raise awareness among their stakeholders and social groups to show public support for compensating measures at EU level.

National level: implementation

Equality mainstreaming

The implementation of many of the proposed EU Green Deal measures is the responsibility of national or regional governments, creating opportunities for Equality Bodies to contribute to the implementation process. One such opportunity is the development of proposals for the implementation of the Social Climate Fund, which allocates new funds to each Member State to compensate for the potential unequal impact of the measures.

Equality Bodies can engage with representatives of groups that experience discrimination, such as youth, women, people with a disability to seeking their perspectives and make recommendations to decision-makers at the national, regional, and local levels. They can also inform stakeholders through activities and provide recommendations to ensure that projects funded by the Social Climate Fund address inequalities. Raising awareness among the public is a vital role as well.

The Social Climate Fund serves as a crucial avenue for integrating the equality dimension into the implementation of the Green Deal, but it is not the only one. The EU Green Deal will have an impact on a variety of other policies such as transport, energy, and agriculture. Equality Bodies can expand their efforts by mainstreaming equality in these fields as well.

However, it is evident that the Equality Bodies face a significant shortage of expertise, time, and resources, including staff which hinders them in engaging in these roles effectively. Therefore, before making these recommendations, it is essential that the respective governments demonstrate a commitment in prioritising climate change and equality and to provide the Equality Bodies with the necessary resources and mandates to undertake this task.⁶⁷

It is highly recommended to include socio-economic status as a ground for discrimination and to provide the necessary expertise and resources to the Equality Bodies. To address this, a legal framework is needed that will allow Equality Bodies to build cases based upon socio-economic status. Climate change is inherently intersectional and addressing all climate-related inequalities requires Equality Bodies to broaden the scope of their grounds for discrimination.

Legal support in anti-discrimination cases

Equality Bodies have the potential to assist individuals and groups, and in some cases, even initiate proceedings in their own name to bring to light and contest the discriminatory consequences of climate change and/or measures implemented to combat it. As previously mentioned, it is advised that Equality Bodies join an EU Green Deal working group (coordinated by Equinet) to share their approaches towards legal anti-discrimination cases. There is an urgent and important need for Equality Bodies to build a set of legal good practice cases and exchange them among one another.

⁶⁷ Equinet. (2021). A perspective from the work of equality bodies on European equality policy strategies, Equal Treatment Directives, and standards for equality bodies. <https://equineteurope.org/publications/a-perspective-from-the-work-of-equality-bodies-on-european-equality-policy-strategies-equal-treatment-directives-and-standards-for-equality-bodies/>

Research

Finally, it is evident that we are on the threshold of comprehending and addressing the climate crisis confronting us. Given that most Equality Bodies also have a research role, a crucial initial step is to prioritise the EU Green Deal and climate change in their research agenda. Although there may currently be a lack of expertise to support victims in legal cases, conducting research can help develop such expertise and lay the foundation for the emergence of such a legal framework. Investing in research now will not only help to better understand and address inequalities in the future but can also have immediate benefits, such as raising awareness and promoting public discourse on these issues.



5. Conclusion

In summary, certain sections of society are disproportionately impacted by the climate and climate policies. The EU Green Deal presents a unique opportunity to address both the climate emergency and inequality. By consistently applying an equality perspective to all proposed measures and their implementation into national policies, Member States can ensure that vulnerable groups in society are not left behind and that existing inequalities are not exacerbated. Equinet and its members have a crucial role to play in mainstreaming equality and preventing further inequality in the implementation of the EU Green Deal. To enable Equality Bodies to do so effectively, the allocation of support and resources to Equality Bodies is required.

Annex 1: list of survey questions

1. What is the name of your Equality Body?
2. In which country is your Equality Body based?
3. Is socio-economic inequality (i.e., poverty) part of the scope of your organisation's work?
4. Have you encountered climate change as a cause of inequality in your work? This could include concrete complaints/cases, but also your own or external research and data.
In "other," please give an example.
5. Which of the following sectors addressed by the EU Green Deal are most relevant for your current work? Please rank in order of priority.
 - a. Transport (low - high priority)
 - i. Do you currently do any equality mainstreaming of your government's policy on transport?
 - b. Housing (low - high priority)
 - i. Do you currently do any equality mainstreaming of your government's policy on housing?
 - c. Agriculture & Food (low - high priority)
 - i. Do you currently do any equality mainstreaming of your government's policy on agriculture & food?
 - d. Industry & employment (low - high priority)
 - i. Do you currently do any equality mainstreaming of your government's policy on Industry & employment?
 - e. Environment (low - high priority)
 - i. Do you currently do any equality mainstreaming of your government's policy on environment?
 - f. Energy (low - high priority)
 - i. Do you currently do any equality mainstreaming of your government's policy on energy?
6. Are you involved in any activities or projects related to climate change in your organisation, such as the fields mentioned in question 4? (E.g., raising awareness, monitoring, and advising on law and policy, advocating for victims of discrimination, etc.)
If you are involved in activities mentioned in the previous question, please list the projects (with weblinks, if possible).
7. In your own words, please describe key equality concerns around climate change.
8. How would you describe the role an Equality Body can play in the topic of inequality and climate change?
9. Given that there is a link between climate change and equality, what would be an opportunity for your organisation to weigh in on the drafting and implementing of policy regarding climate at the EU level, such as the European Green Deal and Fit for 55, in order to defend the interests of affected groups and influence climate policy?
Please indicate any opportunities in "other".
10. Do you feel you have sufficient expertise and resources to include climate change/policy in your work

11. Please elaborate on the previous question. If you do feel you have the expertise, how did you secure that expertise and resources? If you do not, what is missing and what would help you secure them?
12. Would you use training and/or materials on this subject matter if available?
13. Do you have any questions/comments/suggestions for us? Please leave them in the text box below.

Equinet Member Equality Bodies

ALBANIA

Commissioner for the Protection from Discrimination
www.kmd.al

AUSTRIA

Austrian Disability Ombudsman
www.behindertenanwalt.gv.at

AUSTRIA

Ombud for Equal Treatment
www.gleichbehandlungsanwaltschaft.gv.at

BELGIUM

Institute for the Equality of Women and Men
www.igvm-iefh.belgium.be

BELGIUM

Unia (Interfederal Centre for Equal Opportunities)
www.unia.be

BOSNIA AND HERZEGOVINA

Institution of Human Rights Ombudsman of Bosnia and Herzegovina
www.ombudsmen.gov.ba

BULGARIA

Commission for Protection against Discrimination
www.kzd-nondiscrimination.com

CROATIA

Ombudswoman of the Republic of Croatia
www.ombudsman.hr

CROATIA

Ombudsperson for Gender Equality
www.prs.hr

CROATIA

Ombudswoman for Persons with Disabilities
www.posi.hr

CYPRUS

Commissioner for Administration and Human Rights (Ombudsman)
www.ombudsman.gov.cy

CZECH REPUBLIC

Public Defender of Rights
www.ochrance.cz

DENMARK

Danish Institute for Human Rights
www.humanrights.dk

ESTONIA

Gender Equality and Equal Treatment Commissioner
www.volinik.ee

FINLAND

Non-Discrimination Ombudsman
www.syrjinta.fi

FINLAND

Ombudsman for Equality
www.tasa-arvo.fi

FRANCE

Defender of Rights
www.defenseurdesdroits.fr

GEORGIA

Public Defender of Georgia (Ombudsman)
www.ombudsman.ge

GERMANY

Federal Anti-Discrimination Agency
www.antidiskriminierungsstelle.de

GREECE

Greek Ombudsman
www.synigoros.gr

HUNGARY

Office of the Commissioner for Fundamental Rights
www.ajbh.hu

IRELAND

Irish Human Rights and Equality Commission
www.ihrec.ie

ITALY

National Office against Racial Discrimination - UNAR
www.unar.it

KOSOVO*

Ombudsperson Institution
www.oik-rks.org

LATVIA

Office of the Ombudsman
www.tiesibsargs.lv

LITHUANIA

Office of the Equal Opportunities Ombudsperson
www.lygybe.lt

LUXEMBURG

Centre for Equal Treatment
www.cet.lu

MALTA

Commission for the Rights of Persons with Disability
www.crpdp.org.mt

MALTA

National Commission for the Promotion of Equality
www.ncpe.gov.mt

MOLDOVA

Council on Preventing and Eliminating Discrimination and Ensuring Equality
www.egalitate.md

MONTENEGRO

Protector of Human Rights and Freedoms (Ombudsman)
www.ombudsman.co.me

NETHERLANDS

Netherlands Institute for Human Rights
www.mensenrechten.nl

NORTH MACEDONIA

Commission for Prevention and Protection against Discrimination
www.kszd.mk

NORWAY

Equality and Anti-Discrimination Ombud
www.ldo.no

POLAND

Commissioner for Human Rights
www.rpo.gov.pl

PORTUGAL

Commission for Citizenship and Gender Equality
www.cig.gov.pt

PORTUGAL

Commission for Equality in Labour and Employment
www.cite.gov.pt

PORTUGAL

High Commission for Migration
www.acm.gov.pt

ROMANIA

National Council for Combating Discrimination
www.cncd.ro

SERBIA

Commissioner for Protection of Equality
www.ravnopravnost.gov.rs

SLOVAKIA

Slovak National Centre for Human Rights
www.snslp.sk

SLOVENIA

Advocate of the Principle of Equality
www.zagovornik.si

SPAIN

Council for the Elimination of Ethnic or Racial Discrimination
www.igualdadynodiscriminacion.igualdad.gob.es

SPAIN

Institute of Women
www.inmujer.es

SWEDEN

Equality Ombudsman
www.do.se

UNITED KINGDOM - GREAT BRITAIN

Equality and Human Rights Commission
www.equalityhumanrights.com

UNITED KINGDOM - NORTHERN IRELAND

Equality Commission for Northern Ireland
www.equalityni.org

** This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.*

