

Women's **Policy Group NI**

WPG NI Response to Department for the Economy Consultation on Circular Economy Strategy

March 2023

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1. Introduction

The Women's Policy Group (WPG) is a group of policy experts and practitioners who advocate collectively for women and girls by promoting gender equality through an intersectional feminist lens. We challenge systemic injustice and discrimination affecting women and girls by informing society and influencing policy and law. Our work is informed by women and girls' lived experiences and rooted in international human rights law.

The WPG is made up of women from trade unions, grassroots women's organisations, women's networks, feminist campaigning organisations, LGBTQ+ organisations, migrant groups, support service providers, NGOs, human rights and equality organisations and individuals. Over the years this important network has ensured there is good communication between politicians, policy makers and women's organisations on the ground. The WPG is endorsed as a coalition of expert voices that advocates for women in Northern Ireland on a policy level.

If you have any questions or queries about this response, or would like to discuss this evidence further with the WPG, please contact Elaine Crory, Women's Sector Lobbyist at elaine.croory@wrda.net.

This response was prepared by the following WPG members:

- Elaine Crory – Women's Resource and Development Agency
- Aoife Mallon - Women's Resource and Development Agency
- Alexandra Brennan - Northern Ireland Women's Budget Group
- Rebekah Corbett - UNISON
- Emma Campbell - Alliance for Choice Belfast

Please note that this response also includes evidence from other WPG work, compiled by a range of WPG members, and not all member organisations have specific policy positions on all the areas covered in this response.

1.1 Endorsements

The WPG would like to endorse the response submitted to this call for evidence by the Northern Ireland Women's Budget Group.

2. Past Consultations Responses, Evidence Submissions and Briefings

Several members of the Women's Policy Group have been campaigning on matters relating to sustainability and climate change for many years. The WPG has published a wide range of evidence through various evidence submissions, public consultation

responses and specific briefings on issues relating to these issues. Responses made by the WPG and some of our members, in relation to these issues include:

- WPG COVID-19 Feminist Recovery Plan [Key Briefing](#): Climate Justice is a Feminist Issue¹
- WPG [Response](#) to Consultation on 10X Performance Management Framework²
- WPG Response to Discussion [Document](#) on a Climate Change Bill³

3. WPG Feminist Recovery Plan

3.1. Overview of WPG Feminist Recovery Plan:

The WPG NI COVID-19 Feminist Recovery Plan highlights the disproportionate impact of the pandemic on women in Northern Ireland and makes several recommendations for addressing this impact. The Plan also provides detailed evidence of pre-existing gender inequalities in our society, which have become exacerbated as a result of the pandemic. The Plan covers a wide range of topics, including violence against women, health inequalities and women's poverty, within six main Pillars: Economic Justice, Health, Social Justice, Culture, Brexit, Human Rights and a Bill of Rights, and International Best Practice.

The WPG published a COVID-19 Feminist Recovery Plan in July 2020⁴ (and a relaunched version in July 2021⁵) that provided a comprehensive roadmap on how the NI Executive could not only address the disproportionate impact of COVID-19 on women, but also address the structural inequalities existed before the pandemic that led to such a disproportionate impact on women. A summary of recommendations from the Relaunched WPG Feminist Recovery Plan can be accessed [here](#).

3.2. Recommendations from WPG Feminist Recovery Plan

We would like to reiterate our recommendations from the WPG Feminist Recovery Plan in relation to the proposals set out in this consultation for creating a Circular Economy. In the WPG Feminist Recovery Plan, we highlight recommendations from

¹ WPG (2021) Climate Justice Key Briefing available here: <https://wrda.net/wp-content/uploads/2021/03/Climate-Justice-Key-Briefing-V2.pdf>

² WPG (2022) WPG Response to DfE 10X Performance Management Framework available here: <https://wrda.net/wp-content/uploads/2022/10/WPG-Response-to-DfE-10X-Performance-Management-Framework.pdf>

³ WPG (2021) WPG Response to Discussion Document on a Climate Change Bill available here: <https://wrda.net/wp-content/uploads/2021/02/WPG-Response-to-Discussion-Document-on-a-Climate-Change-Bill-01.02.21.pdf>

⁴ Women's Policy Group (2021) WPG COVID-19 Feminist Recovery Plan. Available here: <https://wrda.net/wp-content/uploads/2020/07/WPG-NI-Feminist-Recovery-Plan-2020-.pdf>

⁵ Women's Policy Group (2021) WPG COVID-19 Feminist Recovery Plan: Relaunch – One Year On. Available here: <https://wrda.net/wp-content/uploads/2021/07/WPG-COVID-19-Feminist-Recovery-Plan-Relaunch-One-Year-On.pdf>

the Women's Budget Group (WBG) and the Women's Environmental Network (WEN)⁶, which we have applied to Northern Ireland. These recommendations include:

- Investment in (social) infrastructure:
 - Co-designing social infrastructure at a local level with the needs of women taken into account,
 - Taking the differing transport needs of women with caring responsibilities into account when creating transport plans; particularly given issues in Northern Ireland of inadequate rural public transport and the fact that women are more likely to rely on public transport.

- Green Jobs:
 - Provide subsidies and other incentives, including paid education leave, to support women, particularly low-income and Black and ethnic minority women, in accessing training and development programmes in high-skilled work in a new green economy,
 - Provide subsidies and other incentives to those working in jobs at high risk of being replaced by automaton, particularly as women are at much higher risk of this,
 - Encourage women and girls into male-dominated green sectors that are encouraged through a Northern Ireland Green New Deal.

- Sharing Care:
 - Recognising the dual-benefit job creation and increased tax revenue through investing in paid care jobs that are already done in an unpaid capacity by majority women,
 - Through increased investment in care jobs and the care sector, not only will women's employment and economic opportunities increase, but children from disadvantaged backgrounds will benefit from increasing qualities of childcare and education,

⁶ Women's Environmental Network (2021) 'Feminist Green New Deal' <https://bit.ly/3j3r69x>

Maeve Cohen and Sherilyn MacGregor (2020), 'Towards a Feminist Green New Deal for the UK: A Paper for the WBG Commission on a Gender-Equal Economy', UK Women's Budget Group and Women's Environmental Network. <https://bit.ly/3xOOiVI>

Maeve Cohen and Sherilyn MacGregor (May 2020), 'What would a Feminist Green New Deal look like? - Summary Briefing', UK WBG and WEN. <https://bit.ly/3zTvptY>

- Broaden definitions of 'green jobs' beyond construction and technology to incorporate the care sector as an already existing low carbon, high compensate sector that is increasingly neglected,
 - Ensure that all green jobs in Northern Ireland include a real living wage, are securely contracted, ethically procured and unionised,
 - Implement a 30-hour paid work week in recognition of unavoidable unpaid care,
 - Actively encourage and incentivise care leave and caring responsibilities being undertaken by men,
 - Establish a Universal Basic Income or Universal Basic Services to ensure minimum living standards and recognise and remunerate the £4.6 billion unpaid carers contribute to Northern Ireland each year,
 - Balance recommendations for greater food self-reliance with recognition of the gendered, unpaid and low-paid labour involved in producing and providing food, particularly as Northern Ireland may be disproportionately impacted by different food standards to Great Britain post-Brexit,
 - Supporting and developing sustainable small businesses that reduce domestic work through mass preparation and distribution of locally grown food.
- Democracy and Ownership:
 - Promoting economic, ecological and carbon education campaigns for schools and the wider public to be adequately funded through a Climate Change Act and within the Programme for Government,
 - Ensure equality impact assessments of all environmental policies and ensure consultation on policies with groups representing various genders, races and classes within civil society,
 - Make socio-economic equality of protected characteristics a key goal of any green new deal framework and ensure co-design of planning and policies with the Women's Sector,
 - Promote a cultural shift towards valuing care as a key part of the infrastructure of the environment and economy.

- (Inter)national Responsibilities:
 - End the hostile environment in the UK towards migrants and fully remove information exchanges between public bodies (including those in Northern Ireland) and the Home Office,
 - Promote fair tax policies which close tax loopholes, redistribute wealth between women and men and hold transnational corporations to account for exploitation of people and harm to the planet,
 - Introduce a Bill of Rights for Northern Ireland,
 - Protect human rights, including sexual rights, reproductive rights, and working rights,
 - Promote trade justice within supply chains and create ethical procurement guidelines in line with the above recommendations.

Several members of the WPG were on the Gender Equality Strategy Expert Advisory Panel, and we would like to take this opportunity to highlight recommendations made by the expert panel in their report.⁷

Recommendations:

- Co-design social infrastructure at a local level with the needs of women taken into account. This should include transport which is one of the biggest contributors to climate change, taking into account inadequate rural public transport in Northern Ireland and the fact that women are more likely to rely on public transport.
- Conduct a skills-needs analysis to establish the skills required by men and women to equally participate and benefit from opportunities created in the green economy. The information should be used to create targeted green skills development and training initiatives for both men and women.
- Provide subsidies and other incentives, including paid education leave, to support women, particularly low-income and Black and minority ethnic women, in accessing training and development programmes in high-skilled work in any new green economy.

⁷ Gender Equality Strategy Expert Advisory Panel Report available here: <https://bit.ly/2SRZcmu>

- Ensure funding and resource allocation prioritises programs that train women and girls for non-traditional roles to enable them to make the transition into male-dominated occupations in the green economy.
- Ensure that all green jobs in Northern Ireland are paid at a real living wage, are securely contracted, ethically procured and unionised.
- Put in place accountability procedures to ensure all relevant stakeholders are held accountable for operating in a gender-responsive manner to achieve gender equality outcomes in the green economy. This can be done through gender responsive planning, monitoring and evaluation mechanisms to ensure that measures to advance gender equality in the green economy are having the desired impact.
- Invest in gender-disaggregated data which is critical for understanding the constraints affecting women and men's equal representation and participation in green job sectors.
- Broaden definitions of 'green jobs' beyond construction and technology to incorporate the care sector as an already existing low carbon, high recompense sector.
- Promote a cultural shift towards valuing care as a key part of the infrastructure of the environment and economy.
- Recognise the dual-benefit of job creation and increased tax revenue through investing in paid care jobs that are mostly done by women.
- Actively encourage and incentivise care leave and caring responsibilities being undertaken by men.
- Promote economic, ecological and carbon education campaigns for schools and the wider public to be adequately funded through a Climate Change Act and within the Programme for Government.
- Ensure the equal participation of rural women and girls in policy making processes on disaster mitigation and climate change.
- Ensure rural women are a target group in the development and delivery of a new Rural Development Programme for NI.
- Ensure equality impact assessments of all environmental policies and ensure consultation on policies with groups representing all Section 75 characteristics.

- Reallocate spending according to equality, wellbeing and sustainability objectives, for example, from polluting industries to green industries.

4. General Comments on the Circular Economy Strategy proposals

“An ethics of care recognizes the fundamental importance of a healthy biosphere not insofar as it can service or appetites for consumption but insofar as we must work with, in, and through the natural environment in order to give and receive care adequately, and in order to create and maintain a secure and sustainable home for ourselves and future generations”⁸

4.1 Climate Change Act

The Northern Ireland Climate Change Act came into force in 2022. The Women’s Policy Group were actively involved in helping to draft this legislation and have a vested interest in seeing its full implementation. In particular, the Women’s Policy Group lobbied hard for the inclusion of a gender proofing provision in the Climate Change Act, to ensure that all measures taken to tackle the climate crisis do so in a way that is conducive to promoting gender equality, by applying an intersectional feminist lens to decision-making. This means analysing the potential and actual impacts of policies on women and using this analysis to identify ways to both mitigate against harmful impacts and promote positive impacts.

The Climate Change Act puts a legal responsibility on the Department for the Economy to ensure that all measures taken to help tackle the climate crisis, including this Circular Economy Strategy, are subject to gender proofing. This goes further than simply carrying out an Equality Screening or Equality Impact Assessment of impacts for Section 75 groups. Gender proofing requires an in-depth consideration, from a gendered perspective, of questions such as:

- How are women and men impacted differently by the climate crisis?
- Which industries will benefit from these measures? Are these male dominated industries? How can women be encouraged into these industries?
- Is there a skills gap between men and women in particular green industries? How can this gap be addressed?
- How can this Strategy promote a Circular Economy in Northern Ireland in a way that both prevents negative impacts and actively seeks to improve and reduce inequalities?
- Based on an understanding of pre-existing gender inequalities, how will this Strategy impact men and women respectively?

⁸ F. Robinson, *The ethics of care: A feminist approach to human security* Temple University Press, Boulder, CO (2011), p.144

The Women's Policy Group is keen to assist and engage with the Department to ensure that the Circular Economy Strategy works for women and all people in Northern Ireland by addressing inequalities while implementing measures to help tackle the climate crisis.

5. Response to Consultation Questions

This section of our response will provide a response to the consultation questions, based on WPG evidence, learning achieved from other countries and international best practice.

Personal Details

Name: Elaine Crory

Response: I am responding on behalf of the Northern Ireland Women's Policy Group

Sector: Community and Voluntary Sector/ Women's Sector

Vision

By 2050 Northern Ireland will have an innovative, inclusive and competitive economy where business, people and planet flourish, with responsible production and consumption at its core.

Q5. Is this vision the right vision?

Before providing a critique of this vision, we would like to emphasise that the Northern Ireland Climate Change Act 2022 should be the baseline for this Strategy. This Act committed Northern Ireland to an ambitious but necessary target of **achieving net zero by 2050** and this target should be incorporated into this Strategy. While the Strategy is focused specifically on remaking the economy on a circular model, and on the specific actions needed to make this possible, it cannot be separated from the commitments in the Act itself. This Strategy should be rooted in the Climate Change Act and demonstrate how its objectives relate to meeting the legislative requirements.

The WPG would like to raise several concerns regarding the Department's vision laid out above. This Strategy claims to be focused on achieving a circular economy, and yet, this vision appears to be largely concerned with boosting the economy.

The Department must decide if its primary objective is to achieve a circular economy or achieve economic growth, as achieving a circular economy does not necessitate economic growth and the ambitions of this Strategy should not be constrained by

what should be considered an incidental objective. A vision that places the flourishing of business on a par with the flourishing of people and planet is highly flawed. A circular economy must place people and planet first, understanding that business exists to serve people and planet, and not the other way around. A circular economy is, necessarily, not one that exists to promote endless growth.

In terms of measuring economic success, the WPG would like to note that GDP is not necessarily the best way to measure the success of an economy, as it focuses solely on economic growth. Alternatively, the Genuine Progress Indicator (GPI) takes everything that GDP uses into account when measuring a country's economy, and then adds other figures that represent, for example, the cost of the negative effects of economic activity and consumption, such as the cost of crime, cost of ozone depletion, and cost of resource depletion. We have elaborated upon this point in response to Question 7.

Furthermore, the Department for the Economy have failed to adequately reference or draw links between its proposals for a Circular Economy and the UN Sustainable Development Goals (SDGs). In this consultation, the focus adheres only to value creation opportunities through efficiency with material resources, which then denies "the human and social dimension of production processes and parallel socio-cultural transformations. The labor, creativity, intention put into products is not valued."⁹

The United Nations Environment Programme (UNEP) (2015) proposes four key principles¹⁰ of Sustainable Consumption and Production (SPC):

1. Improving people's quality of life without increasing environmental degradation and without compromising resource availability,
2. Decoupling economic growth from environmental degradation,
3. Applying life-cycle analysis,
4. Avoiding the rebound effects, where efficiency gains are cancelled by resulting increases in consumption.

Within the SDG framework, it is also necessary to broaden our understanding of the circular economy through gendered perspectives and the ethics of care. The cycles of both our natural environment and caring and reproductive labour, often only are

⁹ K. Hobson, N. Linch, Diversifying and de-growing the circular economy: Radical social transformation in a resource-scarce world
Futures, 82 (2016), pp. 15-25, p.22

¹⁰ UNEP, Sustainable consumption and production: A handbook for policy makers
(2015) (Accessed 16 March 2023)

<https://sustainabledevelopment.un.org/content/documents/1951Sustainable%20Consumption.pdf>

noticed and valued when they become unstable and cease to provide the support we rely on.¹¹

Target

Within this strategy we have included a target to reduce our annual material footprint to 8 tonnes per person by 2050.

Q6. Do you agree with this target to halve our material footprint by 2050?

The Women's Policy Group agrees that reducing our annual material footprint is an urgent priority, however the WPG urges caution in taking an individualist approach to this issue, as opposed to a collective approach. Focusing on material footprint 'per person' implies that everyone has a similar footprint and therefore must reduce their footprint by similar amounts. We must reduce our material footprint as a society, as a matter of urgency, and in accordance with the principles of a just transition. To do this, the WPG believes that the Department should take a targeted approach to tackling the industries and lifestyle choices that contribute most to our material footprint.

The fundamental principles of a just transition recognise that the contributions each individual makes to our material footprint vary widely, and that any measures introduced to tackle the problems associated with this must be cognisant of this fact. The overall approach of just transition is to ensure that those with least resources, and indeed using fewer resources, should not suffer disproportionately from the policies put in place to address climate change.

A ClimateJust report¹² for the Joseph Rowntree Foundation shows that:

“Current policies to reduce household carbon emissions have inequitable impacts: the average impact on household energy bills in England in 2020 is a 7% reduction for the poorest 10% and a 12% reduction for the richest 10%. This represents a triple injustice: the lowest income households pay more, benefit less from policies and are responsible for the least emissions.”¹³

It also states that:

¹¹ Pla, S. Guevara, Towards an integrative approach to sustainability: exploring potential synergies between gender and environment CEPAL Review, 110 (2013), pp. 49-67

¹² Distribution of household carbon emissions in the UK <https://www.climatejust.org.uk/resources/distribution-household-carbon-emissions-uk>

¹³ ClimateJust, Distribution of Household Carbon Emissions in the UK. Available online here: <https://www.climatejust.org.uk/resources/distribution-household-carbon-emissions-uk>

“Household carbon emissions in Great Britain are strongly related to income: the richest 10% of households emit three times that of the poorest 10% from energy use in the home and personal travel.”

Left unaddressed, an individualist approach to addressing material footprint will deepen the impact of already rampant poverty and deprivation in the UK. Not only will it disproportionately punish those who contribute to pollution the least, it will also perversely benefit those who cause the most pollution. Therefore, embedding the genuine principles of a Just Transition is key to this Strategy.

Further, it is our view that our material footprint could be reduced more efficiently and more quickly by taking a targeted approach with focused interventions on major polluting industries, and assistance in the development of sustainable and green industries that can grow a circular economy and make circularity the norm in industries beyond the most heavy polluters. This could mean that, instead of thinking in terms of material footprint per person, thinking about material footprint as a society overall. We could make more ambitious gains in material footprint reduction that way, while at the same time avoiding the risk of unduly burdening a person whose material footprint may already be low.

There is an additional benefit to this approach, as it could also help to address a potential problem of public perception. We anticipate that there might be resistance against efforts aimed at addressing climate change as a perception exists that these types of policies punish those who can least afford it, while at the same time allowing the major polluters “off the hook.” It would be wise for this Strategy, and other work streams flowing from the Climate Change Act, to be mindful of this and seek to ameliorate these perceptions where possible.

Throughout this response, we have reiterated the argument about individual vs collective responsibility for tackling material footprint and will continue to highlight it as an issue of high importance. All people have different needs and live different lifestyles. These differences largely relate to race, class, disability, religion and gender. Women remain more likely to work in jobs that already fit within the circular economy model, such as in health and social care, which is considered a relatively ‘green’ industry, but which has been historically underfunded and undervalued. At the same time, women are targeted for consumption by, for example, fast fashion companies in ways that an insightful and inclusive Strategy should seek to address¹⁴. We have explored potential solutions for this in response to Q. 11.

¹⁴ https://zerowasteurope.eu/wp-content/uploads/2023/01/Jan23-ZWE-report-_Beyond-Circular-Fashion_-Exec-Summary.pdf

The WPG has consistently argued that climate change is a gendered problem that disproportionately impacts women and girls around the world.¹⁵ Gendered issues require gendered solutions, and experience across all government departments and sectors has shown us that taking a ‘gender-neutral’ approach does not have gender neutral outcomes. Rather, by ignoring the reality of pre-existing gender inequalities, it is, in practice, not a ‘gender neutral’ approach, but a ‘gender blind’ approach. This approach can be considered ‘gender blind’ because it further entrenches inequalities and will overwhelmingly benefit working-aged, able-bodied men.

The United Nations recognises the inextricable link between tackling climate change and addressing gender equality. For example, Goal 5 of the UN Sustainable Development Goals (SDGs) is “Achieve gender equality and empower all women and girls.” It is important that we demonstrate the benefits of a Circular Economy strategy to all of our SDGs, including those concerned with social and cultural issues. This approach is key to the overall contribution of sustainable consumption and production to sustainable development for everyone in our communities, and to building the coalitions and cooperation needed to make such a transformative shift¹⁶.

A pilot policy and instrument review 262 reported that, although the potential economic benefits of SDGs and production processes are well established, the social and cultural benefits are overlooked. The United Nations report on sustainable consumption and production patterns showed how rarely these impacts were included in policy objectives or measurements:

“63% of the reported policies and instruments examined their impact on air, soil and water pollution, 45% on waste reduction and 43% on greenhouse gas emissions. Only 11% considered their impact on health, and 7% looked at their impact on gender.”¹⁷

We argue for an approach that combines the valuing of the work currently done mostly by women, such as caring and educating, as well as encouraging and incentivising women into the kinds of science and technology jobs that will be created in response to this crisis. We agree with Fredman’s argument that:

“[The] focus on improving women’s participation in new green jobs in science and green technology tends to miss the crucial role of unpaid care in perpetuating gendered working patterns. The emphasis on caring work risks reinforcing the notion of ‘women’s work’ and missing out on new

¹⁵ WPG COVID-19 Feminist Recovery Plan [Key Briefing: Climate Justice is a Feminist Issue](https://wrda.net/wp-content/uploads/2021/03/Climate-Justice-Key-Briefing-V2.pdf). Available here: <https://wrda.net/wp-content/uploads/2021/03/Climate-Justice-Key-Briefing-V2.pdf>

¹⁶ United Nations Statistics Division (2019a). *SDG Indicators*. [online] Un.org. Available at: <https://unstats.un.org/sdgs/report/2019/goal-11/>

¹⁷ United Nations Statistics Division (2019). *SDG indicators*. [online] Un.org. Available at: <https://unstats.un.org/sdgs/report/2019/goal-12/>

avenues for women in the workforce. Both are crucial in taking forward the project towards a green and feminist future.”¹⁸

Proposals for Change

Q7. What efforts do you think government should make to promote behavioural change?

Please put the following in order of priority.

(Ranking scale 1 = most preferred / 4 = least preferred)

1. Use regulatory and financial (dis)incentives to increase affordability and availability of sustainable options.
2. Provide or adapt physical infrastructure to help make it easier for people to change behaviours e.g. recycling centres, refill stations in supermarkets and bottle banks.
3. Provide greater transparency and clarity on what government is doing to show commitment and create momentum.
4. Provide information and tools to increase awareness and help change attitudes.

The WPG believes that promoting behavioural change requires taking a whole-society approach. As well as needing all parts of society mentioned above, it will also have particular importance for the community sector and civil society. This Strategy aims to be inclusive of the business and agricultural community in achieving its objectives, but it must also engage meaningfully with the community and voluntary sector. The human rights and equality implications of this work are significant and ought to be considered, therefore, civil society buy-in and intellectual input will be essential for the successful implementation of the Strategy.

Promoting this behavioural change must be framed and understood as a collective issue requiring collective action, not one that focuses on individual actions. This is both because it is an uneven approach that shifts the burden to those most impacted, and because it is ineffective and inefficient. We must move swiftly and decisively to meet the targets set by the Northern Ireland Climate Change Act, and small, individual changes, while welcome, will not suffice.

¹⁸ Fredman, S. (2023). The world of work: A green and feminist future? In: C. Albertyn, M. Campbell, H. Alviar García, S. Fredman and M. Rodriguez de Assis Machado, eds., *Feminist Frontiers in Climate Justice*. [online] Cheltenham, UK: Edward Elgar Publishing Ltd., pp.116–137. Available at: <https://www.elgaronline.com/display/book/9781803923796/book-part-9781803923796-10.xml> [Accessed 16 Mar. 2023].

The above list of proposed measures for promoting behavioural change references using financial incentives as a way to increase affordability and availability of sustainable options. The inclusion of this option is highly concerning, since a key objective of this Strategy is supposedly to reduce over-consumption. Evidence shows that financial incentives can actually drive consumption by making goods or services more affordable and therefore this approach could work against the overall goals of the Strategy.

A fall in the price of goods and services tends to spark demand, which in turn increases consumption. Higher rates of consumption, including even consumption of marginally more sustainable products and services, will always run counter to the principles of the circular economy. Irresponsible consumption and especially overconsumption must be framed and understood as a key problem, and because it is a mindset that thrives in a growth-based economy, we must tackle these issues by moving away from incentives targeted towards growth, and towards a new relationship with the world we take resources from and how we treat the goods we consume.

The issue of growth-mindset must be addressed and tackled in our shared project against climate change and the climate crisis. Presently, the focus is almost entirely on the growth of the economy, measured in GDP. Because we live in an interconnected, global economy, this approach encourages a competitive approach to economics. However, a good economy is one that provides for a thriving population, it is not one that performs better than its competitors.

The WPG argues that GDP is not necessarily the best way to measure the success of an economy and suggests that a better approach to measuring progress is by using the Genuine Progress Indicator (GPI). The GPI indicator takes everything the GDP uses into account when measuring a country's economy, and then adds other figures that represent, for example, the cost of the negative effects of economic activity and consumption, such as the cost of crime, cost of ozone depletion, and cost of resource depletion.

It also adds figures regarding the positive effects of economic growth with a view to capturing whether or not it has benefited people overall. It reflects the fact that growth is not a good thing in and of itself; the good comes from the positive impacts on human lives and on the planet. This would be a far more useful measure of "growth" not only because it would lead to better impacts in the here and now, but also because it is closer to the reality that we need to collectively grasp; endless growth is simply incompatible with a Net Zero future, a circular economy, and a planet that is habitable everywhere.

When considering any kind of financial incentive, the benefits of economic circularity must be balanced against risks to our trade partners (and particularly low-income countries). Chatham House notes that an increase in product circularity means that high quality secondary products that are easy to repair, remanufacture or recycle will remain in circulation within developed economies. This will entail a gradual decline in the quality of goods shipped to secondary markets¹⁹.

We have included dis-incentives as a way to embolden systems and strengths of checks and balances on those actors who bear the greatest responsibilities for environmental harms: large corporations and big businesses²⁰. A green/carbon tax or levy must be of a high enough value that the organisations don't just simply pay up and then maintain business as usual, they must make their businesses untenable without proper adherence to the principles of environmental and caring sustainability.

As individuals, we are already paying a significant health toll for the unfettered introduction of microplastics in our soil²¹ and water and poisonous gases in the air that contribute disproportionately to health disparities in poorer communities and those living in urban environments. In Northern Ireland, around 182,000 people are currently receiving treatment for asthma, including 36,000 children. Ireland has one of the highest rates of asthma prevalence in the world. It is the most common chronic disease affecting children, and the most common chronic respiratory disease in adults.²²

Create clusters and networks to raise awareness and facilitate collaboration

Q8. What existing clusters and networks could be utilised to deliver transformative solutions for increased circularity?

The WPG is concerned that the framing of this question is problematic as it invites lobbying from industries and networks that seek to gain financially from parts of the economy that could benefit from any kind of investment available. It is important that the Department takes a responsible approach to utilising existing clusters and

¹⁹ Chatham House (2022), The role of international trade in realizing an inclusive circular economy. Available at: [04 Global dynamics of circular trade | Chatham House – International Affairs Think Tank](#)

²⁰ Croner-i (2021). *Biggest environment fines of 2020 | Croner-i*. [online] app.croneri.co.uk. Available at: <https://app.croneri.co.uk/questions-and-answers/biggest-environment-fines-2020>

²¹ Fink-Hooijer, F., Child, P., De Avila, C., Gallina, S. and Paris, J. (2023). *Nanomaterials in everyday products: results from recent testing and concrete measures to inform and protect citizens and ecosystems from nano-related risks*. [online] Available at: <https://zerowasteurope.eu/wp-content/uploads/2023/03/NANO-Open-Letter-17-NGOs-to-EU-COM-20230314.pdf> [Accessed 16 Mar. 2023].

²² Asthma and Lung UK (2023). Northern Ireland | Asthma + Lung UK. [online] www.asthmaandlung.org.uk. Available at: <https://www.asthmaandlung.org.uk/northern-ireland#:~:text=Asthma%3A%20In%20Northern%20Ireland%2C%20around> [Accessed 16 Mar. 2023].

networks, and considers the environmental and social impact of the clusters and networks that potentially stand to benefit from financial support.

In addition, it is important that these networks and clusters are not only chosen based on their current need for transformation. For example, they should not be chosen simply because of how high their pollution levels are, rather, the Department must work proactively to ensure that the promise of investment does not lead to a situation where the worst polluters are counter-productively incentivised, which will facilitate the continuation of harmful pollutant practices.

It is also important to ensure that industries and networks that are presently doing a great deal of work to transform or that are already net zero sectors or very low carbon sectors are utilised in this process; both as models to learn from and as ways to speed up the move towards net zero. Examples of this include the health and social care sector, where some Trusts have already begun providing electric vehicles for social care workers, and the education sector, particularly the childcare sector, which is already almost carbon neutral and which could be used as a model to bring learning to other sectors. Trade unions, which almost always represent workers from a variety of industries, encompassing those who are making significant improvements and those with the most pressing need to change, can be used as conduits for the kind of learning needed to make this process work. Existing networks that should be included in this work include; the Women's Regional Consortium, ICTU, the Health & Social Care Trusts, and the various parts of the education sector.

We have industries here that are already carbon neutral or close to this status. Not only would it be a strategic error not to learn from them and place them at the centre of this work, but it would send a poor message to society and industries in general about what parts of our economy we value and who we consider to be key stakeholders in this work towards achieving a circular economy. Income from taxing the worst polluters in our society could be re-invested to provide support and promote growth in existing green sectors such as the care sector.

With those reservations aside, we appreciate that there are useful clusters and networks that can be utilised in efforts towards achieving a circular economy. We suggest that the Department adopt an alternative framing; outlining the robust monitoring that organisations or networks will be expected to partake in once investment has been received, the accountability and scrutiny that they can expect, and the consequences if they do not meet these obligations or meet the targets they are expected to receive. This would improve transparency and increase the likelihood of sustained support and engagement from the voluntary and community sectors throughout the implementation of this Strategy. Monitoring and the use of robust standards to ensure a truly green approach will be essential to this, and we have explored this in more detail in our response to Questions 12 and 15.

Q9. What clusters and networks do you think will need to be established to maximise resource use?

Following on from the points we raised in response to Q. 8, the WPG believes that there are existing under-recognised and under-valued sectors that are central to achieving a green, circular economy. These sectors need to be formed into a network or cluster so that they can maximise their green potential, improve connections and improve learning.

The establishment of a network of carers, including health and social care workers beyond NHS employees, and unpaid carers, and, a similar network for childcare sector employees should be established to share expertise and to facilitate the recruitment and retention of staff. This network could also provide a space for shared learning and among green sector workers, for example, in relation to improved waste management.

Embed Circular Economy principles in public procurement

Q10. How do you think public sector procurement can best influence the behaviours of industry to increase circularity of resources?

Procurement is one of the most critical elements of supply chain management, and can help organisations across the private, public and third sectors achieve circular economy objectives. Circular public procurement is just one approach to making procurement more sustainable and environmentally-friendly.

Circular procurement happens when a buyer purchases products or services that follow the key principles of the circular economy, “supporting the assessment of designing, making, selling, reusing and recycling products to determine how to get the maximum value from them, both in use and at the end of their life”²³. Public procurement is an important driver in the transition to a circular economy, and circular principles can be embedded into public procurement at system, supplier and/or product levels.

Cross-sector learning is valuable and necessary to achieve a circular economy. While rethinking need, considering options, energy use, efficiency and sustainability during the public procurement process, public authorities can also consider whether there is potential to support the wider circular economy ecosystem.

Public authorities can consult with suppliers to identify potential new models of provision and encourage sustainable innovation in the form of things like leasing

²³ UN Environment Programme (2021), Sustainable Public Procurement: How to ‘wake the sleeping giant’. Available online at: <https://wedocs.unep.org/bitstream/handle/20.500.11822/37045/SPPWSC.pdf>

options, buy-per-use, shared use or buying and selling back. The European Commission notes that circular procurement can often require a shift from technical specifications being set by the procurer to a process where specifications are set following a series of exchanges between potential suppliers and procurers²⁴. The Commission recommends the establishment of 'innovation partnerships' by public authorities, whereby there is a framework for research and development, piloting and subsequent purchase of a new product, service or work.

The WPG believes that such partnerships have the potential to help coordinate circular activities across a range of sectors, influencing wider industry to become more circular and sustainable. However, circular public procurement must not be viewed as an opportunity to expand the role of public-private partnerships in delivering key public services. Public bodies can instead take a lead by facilitating discussions with shortlisted candidates before final tenders, to identify sustainable alternatives and circular contract specifications. Rather than simply compelling suppliers to contribute towards circular economy goals, public bodies should make meaningful efforts to engage with these suppliers to strengthen cooperation.

Including circular economy mechanisms and principles in public procurement specifications can encourage efficiency and economic recovery, to the benefit of all of society²⁵. While a lack of government support (in the form of, for example, financial incentives) will lead to higher costs, especially for small businesses, a well-designed incentive system designed by government can encourage public bodies - and private business - to embed circularity in supply chains²⁶.

In order to unlock the transformative potential of circular public procurement across wider society, the WPG makes the following recommendations:

- Develop or adopt a set of sustainable procurement tools that all public sector organisations can use to help identify and assess how they can optimise the environmental, economic and social outcomes of procurement activity (similar to Scotland's sustainable procurement tools²⁷).

²⁴ European Commission (2017), Public Procurement for a Circular Economy: Good Practice and Guidance. Available online here: https://ec.europa.eu/environment/gpp/pdf/Public_procurement_circular_economy_brochure.pdf

²⁵ Erridge, A. and Hennigan, S. (2012), Sustainable procurement in health and social care in Northern Ireland. Available online here:

<https://www.tandfonline.com/doi/full/10.1080/09540962.2012.703422?scroll=top&needAccess=true&role=tab>

²⁶ Hsu, C. et al (2013), Supply chain drivers that foster the development of green initiatives in an emerging economy. Available online here: <https://www.emerald.com/insight/content/doi/10.1108/IJOPM-10-2011-0401/full/html>

²⁷ <https://sustainableprocurementtools.scot/>

- Similarly, support local councils to make use of the Local Government Association's Sustainable Procurement Toolkit²⁸, and work towards setting mandatory sustainable or circular procurement targets at council level.
- Provide training on using sustainable procurement tools for council staff, as well as relevant staff across any public sector organisation engaged in procurement activity.
- Work with DAERA Green Growth team and DoF to shape green public procurement strategy, as promised in the Green Growth Strategy.
- Work with DoF and the NI Executive to make Scoring Social Value more ambitious - as well as increasing the minimum weighting for Scoring Social Value to 20% after DoF's review in June 2023, consider lowering services and works thresholds where Procurement Regulations apply - at least for certain public bodies, such as local councils.
- Given that one of the principles of circular procurement involves considering purchasing services rather than products, public authorities should ensure that contracted suppliers are paying workers the Real Living Wage or higher.
- Public sector employers must engage with employees and unions when rethinking supply chains and identifying opportunities to embed circular principles. Workers on the frontline are most keenly aware of areas of waste and opportunities for re-use of resources²⁹

The public sector has an opportunity to lead the way in promoting the circular economy model across society and wider industry, but circular public procurement requires state investment and should be underpinned by legislation to enforce and promote CE principles.

Environmental and social sustainability for communities can be achieved by adopting corresponding vertically-aligned public procurement practices. "The public buyer can contribute to environmental and social sustainability. For instance, Choi (2010) proposes that sharing information related to eco-friendliness between the procurer

²⁸ <https://www.local.gov.uk/publications/sustainable-procurement-delivering-local-economic-social-and-environmental-priorities>

²⁹ Rogers, H.A., Deutz, P. and Ramos, T.B. (2021). Repairing the circular economy: Public perception and participant profile of the repair economy in Hull, UK. *Resources, Conservation and Recycling*, 168, p.105447 <https://www.sciencedirect.com/science/article/pii/S0921344921000549> .

and the supplier may contribute to eco-friendly learning and, as a result, to the overall environmental sustainability of the procured solution.”³⁰

Create and support platforms and hubs to share goods and materials

Q11. What sorts of platforms do you think would be most useful in the future to enable people and business to share and reuse products and materials?

There are several examples of other jurisdictions and states that demonstrate best practice when it comes to creating a circular economy, that we can and should learn from. In addition, there are approaches that are new and should be considered in the drive to transform our economy to one that is just and green.

For example, in France, supermarkets have developed initiatives to eliminate food waste by ensuring that nothing goes to landfill and what is not sold is distributed to the public. Similarly, communities in Northern Ireland, including in Belfast, have established tool libraries designed to provide a platform by which people can borrow large and/or expensive items that are relatively rarely used. This encourages community tool-sharing and reduces waste and consumption. The Play Resource Centre exists to re-use waste and is accessible by community organisations for re-use by the community.

It also challenges the way we think about consumption, which is one of the key objectives of creating a circular economy, as it encourages us to think about products as resources to be shared, as opposed to individual items to be accumulated, used once and/or disposed of. A further ripple effect of this approach is that companies will be rewarded when items are built to be used often and last a long time, discouraging disposable items or poorly constructed items because they will perform badly in the marketplace.

We also encourage expanding on this philosophy by extending it to other areas. For example, platforms could be established to allow for large, expensive farming equipment to be shared and reduce the cost of business for individual farmers. This would be particularly beneficial for communities if these types of initiatives are run by the community they serve.

There are other examples of ideas as yet unexplored that can contribute enormously to the development of a truly circular economy. Fast fashion, as mentioned above in response to Q. 6, is a global industry that generates enormous amounts of waste and

³⁰ Malacina, I., Karttunen, E., Jääskeläinen, A., Lintukangas, K., Heikkilä, J. and Kähkönen, A.-K. (2022). Capturing the value creation in public procurement: A practice-based view. *Journal of Purchasing and Supply Management*, 2(28), p.100745. <https://www.sciencedirect.com/science/article/pii/S1478409221000844>

overconsumption³¹. The clothing industry in general, even when not considering the parts known colloquially as “fast fashion”, is often a very polluting industry, and a culture of over-consumption can lead to clothes being discarded which could be re-used as is or mended for use, if the owner had the skills and resources to do so. Individuals may do so via the use of charity shops, but not only is this inaccessible for many people, it requires an individual approach while we are urging a collective, society-wide approach.

We strongly recommend investing in infrastructure that can assist in this effort, for example an online hub for charity shops, allowing the listing of items for sale that can be sent to other locations as needed (an item donated in Cookstown sent to Craigavon, for instance). The use of charity shops is increasing, but this could be expanded considerably by making it easy for customers to find the things that they need rather than browsing without any particular need.

This online hub could be backed up with local hubs that help people to repair ill-fitting or damaged but salvageable clothing, and providing the resources for them to do so themselves. For example, lessons on using sewing machines could be rolled out in various locations and these could be accompanied by “tool library” type services that allow people to borrow items for mending clothes, or provide a shared space to use them without the need for purchase. For example, there are several community repair initiatives in Sweden, both government-led and NGO-led, that have demonstrated the benefits of enabling all, particularly marginalised groups, to participate and live well in a low-impact future. As Bradley and Persson (2022) point out:

“In contrast to the mainstream circular economy discourse, the purpose of community repair is not only about repairing broken stuff and reducing waste, but about building social relations and practicing non-consumerist forms of citizenship. By elucidating these different perspectives on repair – who is to perform it, with what skills and for what purposes – we highlight how the transition to future, more circular economies, can be enacted and steered in ways that allow for different roles and powers for citizen-consumers.”³²

All of this could be transformative, but requires investment from the state, either centrally or through local Councils. Key to the success of popular and effective platforms and apps, such as tool and toy libraries and food waste reduction apps, is

³¹ United Nations Environment Programme <https://www.unep.org/news-and-stories/story/environmental-costs-fast-fashion>

³² Bradley, K. and Persson, O. (2022). Community repair in the circular economy – fixing more than stuff. *Local Environment*, 27(10-11), pp.1-17. <https://www.tandfonline.com/doi/full/10.1080/13549839.2022.2041580>

the ownership and operational model. It is important that these initiatives are developed and managed by local community organisations and/or the state.

Digital platforms will play an important role in facilitating sharing of resources, and shifting from ownership to access - both of which are key to the circular economy. However, when the platform economy becomes dominated by powerful corporate interests (the likes of Uber, Airbnb, etc), there is a much greater risk of exploitation of vulnerable groups of workers. The gig and platform economy is dominated by groups of workers who traditionally find themselves on the fringes of the labour market. Jobs in the platform economy are often marketed towards women, young people and migrants, who seek flexibility and autonomy. In reality, algorithmic management tools limit autonomy in the workplace, while asymmetrical information between employer and worker undermines bargaining power and leaves the worker vulnerable, subject to increasingly casualised and insecure work.³³

To protect the rights of workers, sharing and circular economy initiatives must be **developed in the interests of communities** rather than big business. As noted above, financial support at the central government or local council level will be critical to ensure that this burgeoning industry serves its purpose, which is facilitating the sharing and re-use of resources, rather than being overtaken for the purposes of profit.

In terms of examples of best practice elsewhere, there are several other case studies available from New Zealand³⁴, Germany's food waste strategy³⁵, and France's approach to supermarket waste³⁶ that we recommend researching and learning from in the development of the Circular Economy Strategy.

Maximise the value of materials locally

Q12. What are the most effective tools that government could use to encourage and facilitate business and society to extend the life of products and services to keep materials and resources in use for longer?

A number of the suggestions listed in response to Q. 11 are things that would extend the life of products and keep materials in use for longer, such as our proposals around helping people to find second-hand clothing and to repair clothes that need alteration or mending. These require investment by government in order to reach a point of

³³ Calo, R., & Rosenblat, A. (2017). The taking economy: Uber, information, and power. Available online here: [THE TAKING ECONOMY: USER, INFORMATION, AND POWER-Web of Science Core Collection](#)

³⁴ Sustainable Business Network (2022). *Case Studies*. [online] sustainable.org.nz. Available at: <https://sustainable.org.nz/learn/case-studies/> [Accessed 16 Mar. 2023].

³⁵ Press and Information Office of the Federal Government, Germany (2023). *Halving food waste*. [online] Website of the Federal Government | Bundesregierung. Available at: <https://www.bundesregierung.de/breg-en/service/archive/halving-food-waste-1582700#:~:text=Since%202012%20the%20%22Zu%20gut> [Accessed 16 Mar. 2023].

³⁶ https://zerowasteurope.eu/wp-content/uploads/2020/11/zwe_11_2020_factsheet_france_en.pdf

sufficient use to make an impact on these goals. This investment involves both potentially investment in people and skills and most critically investment in infrastructure.

Another key area where the government can influence behaviour in a positive way is through the use of public awareness campaigns. These campaigns would ideally be positive and encouraging, focusing on work that the government or council have put things in place to make reusing materials easier. Any scheme set up as part of this Strategy should ideally come with a budget line attached to ensure that the public as a whole is aware of the scheme. This will facilitate maximum uptake and lead to the best outcomes possible.

Alongside these positive awareness campaigns, the government must consider an approach that actively disincentivises businesses in particular from using single-use plastics and other materials that contribute to pollution, as well as making items that cannot be repaired or repurposed for another use. Other European countries are already taking similar approaches, for example Italy, the Netherlands, and Spain³⁷.

In parallel with these disincentives, there is a need to help people move to reusable options where possible by helping them to try sustainable options without spending money up-front that they cannot spare, a financial risk that many may be unwilling or unable to afford to take. There are examples of schemes like this in operation in Northern Ireland already, for example the reusable period products giveaway, run by Belfast City Council, which allowed any resident in Belfast to choose between reusable products to try and was enormously successful in its pilot year and will run again³⁸.

Similarly, Belfast City Council runs a cloth nappy scheme³⁹ that allows parents to try using reusable nappies for two weeks for free, as well as a £30 refund on the cost of buying cloth nappies should the parents decide to proceed with this option. Ideally, this scheme would be both widely publicised and available to all parents regardless of their Council area, this is the kind of scheme that allows and encourages people to try more sustainable options at no risk, as well as encouraging people towards more sustainable material use in the long term.

Learning from these schemes, where they exist, should be replicated and repeated, as the initial financial outlay will be quickly offset by the lowering of household waste. The success of these schemes can encourage the growth of new businesses focused

³⁷ KPMG Global, Plastic Tax. Available at: <https://kpmg.com/xx/en/home/insights/2021/09/plastic-tax.html>

³⁸ Belfast City Council 2023 <https://www.belfastcity.gov.uk/news/reusable-period-product-giveaway-returns-after-pil#:~:text=pilot%20in%202022,-A%20free%20reusable%20period%20product%20giveaway%20has%20returned%20once%20again.%2C%20plastic%20Dfree%20period%20products>.

³⁹ Belfast City Council <https://www.belfastcity.gov.uk/clothnappyscheme>

on sustainable products and contribute to the wider cultural shift that is needed in the way we collectively approach the use of materials.

In tandem, we need a system of green taxes on non-essential single use plastics and on items that cannot be repaired or re-used. The goal of these is to financially incentivise manufacturers to ensure that their products are re-usable where possible. In tandem with the rest of the approaches outlined here, it will encourage a move away from the disposable approach to resources in both manufacturing and in public behaviour. We have explored these issues in more detail in response to Questions 15 and 16.

Establish a Circular Economy funding programme

To unlock benefits at scale, we need to create economic incentives that enable Circular Economy solutions to succeed.

Q13. Which of the following interventions should be a priority focus for government funding? Please put the following in order of priority. Further comments? Please enter response in box below.

(1= highest priority and 9 = lowest priority)

1. Environmentally focused solutions
2. Carbon emissions reduction
3. Reuse and repair
4. Circular supply chains
5. Waste reduction
6. Research and Development
7. Secondary material markets
8. Digitisation and technology
9. Job creation

Although we have provided a ranking of these interventions above, we would like to stress that ALL of these interventions should be a focus for government. It is impossible to create a circular economy if only a select few of these interventions are implemented.

The establishment and maintenance of a circular economy relies on the ability of the Department to take a multi-track approach, recognising the inextricable links between these interventions. For example, digitisation and technology cannot be promoted at the expense of waste reduction objectives, and job creation cannot be promoted at the expense of carbon emissions reduction. Rather, digitisation and technology should be used in a way that encourages circular economy practices and the focus of job creation should be on creating 'green' jobs or jobs that actively seek to promote a circular economy.

It is also worth noting that the Women's Policy Group consider all of these interventions to be 'environmentally focused solutions' and would like to express confusion as to why this was included as a standalone intervention when it is an umbrella term that encompasses all of the other proposed interventions. This list is a confusing mix of umbrella terms and specific interventions which makes it difficult to accurately reflect the views of stakeholders who have responded to this consultation.

We would like to provide some specific comments on some of these interventions to demonstrate what the Women's Policy Group would like to see promoted as part of the Circular Economy Strategy.

- Digitisation and Technology

Digitisation and technology will be required for providing solutions to some of the other proposals, for example circular supply chains. We need to think about the energy used for digitisation and technology, and as such we need green ways to support our energy consumption, including generating green energy here in Northern Ireland, such as harnessing wind, solar and tidal power. In addition to investing in the development of renewable energy sources we should be recruiting relevant experts and encouraging women into these professions.

- Job Creation

It is vital that the Strategy is clear that the jobs created should be green jobs. We are also minded to stress that job creation will flow naturally from the other issues listed here and need not be a priority in itself if the other parts are done correctly. Finally, the Strategy must think in terms of jobs for all, not just for men currently working in related industries. We would like to highlight the following argument made by Fredman (2023) that:

“Without a clear recognition of and efforts to narrow the gender gap in terms of sectoral/occupational segregation and access to training, there is

a high risk that the transition to a green economy will only perpetuate the existing situation."⁴⁰

The feminist 'Purple Economy' organising principle is to recognize, reduce and redistribute unpaid care work, a strategy endorsed at the UN Commission on the Status of Women in 2014, and is also the organising principle of the ILO Care Work report. Interestingly, it draws parallels between the Purple Economy and the Green Economy, counterposing 'purple jobs' to 'green jobs'. Just as environmental costs should be internalised, so should the costs of caring labour. The purple economy is based on four pillars:

1. Universal social care, which provides quality care services for all;
2. Labour market regulation for work-life balance;
3. Ecologically sound physical infrastructure providing rural communities with access to clean water, sanitation, energy, transport and communication;
4. An enabling macroeconomic environment, which sets fiscal and monetary policies for decent employment⁴¹

Q14. What funding instruments do you consider would be most appropriate in years 1-3? Please put the following in order of priority.

(Ranking scale 1 = most preferred / 3 = least preferred)

1. Blended finance
2. Grants and subsidies
3. Loans

Q15. Do you have any further comments to make on funding instruments that could be used to enable Circular Economy solutions to succeed?

The WPG recommended blended finance as the best option, but we do not think that there should be a "one size fits all" approach to this issue, rather, the finance options should be blended but not equally blended for all.

⁴⁰ Fredman, S. (2023). The world of work: A green and feminist future? In: C. Albertyn, M. Campbell, H. Alviar García, S. Fredman and M. Rodriguez de Assis Machado, eds., *Feminist Frontiers in Climate Justice*. [online] Cheltenham, UK: Edward Elgar Publishing Ltd., pp.116–137. Available at: <https://www.elgaronline.com/display/book/9781803923796/book-part-9781803923796-10.xml> [Accessed 16 Mar. 2023].

⁴¹ https://womenlobby.org/IMG/pdf/purplepact_publication_web.pdf

Small businesses and startups should be eligible for non-repayable grants to allow them to begin the work of becoming more sustainable. On the other hand, large companies with significant profits who can afford to make the transition without making a loss, should not get access to these grants. Nonetheless, we recognise that there will be businesses that fall somewhere between these two extremes who should be eligible for a blended option. This in-between option should be carefully considered by the Department with the aim of ensuring that those most in need of the grants can benefit from them.

In addition, the companies that intend to use this finance ought to be held to exacting standards with regards to the work they do, the products they produce, how they handle waste, and their procurement policies. This process must be more than piecemeal and carefully designed to avoid any risk of “greenwashing,” where organisations can mask the true nature of their work by pointing to grants they have received as a result of this Strategy.

Create a regulatory framework that enables circular solutions to become the norm

Q16. Considering the EU right to repair regulation, what other regulatory tools do you consider government can use to stimulate greater circulation of materials?

The EU Right to Repair regulation has been important because it incentivises manufacturers to make sure that they use the best quality materials possible in their process and therefore that products are more robust and last longer. In the context of Brexit, Northern Ireland must ensure that this legislation, in its current form or in any future form, continues to apply to Northern Ireland.

Whether we have the NI Protocol in place, the Windsor Framework, or something as yet unwritten, we must seek to keep pace with, or exceed, any European legislation on Right to Repair or indeed any other European legislation that seeks to reduce waste from manufacturing and keep materials in circulation for as long as possible. To break with EU regulations in this area for any other reason than because our regulations are tighter and more robust should be considered unacceptable, and any body set up to monitor the development of this Strategy must ensure that this is at the forefront of minds and actions.

In addition to keeping pace with the Right to Repair regulations, other regulatory tools should be used by government, such as: green taxes on non-essential single use plastics, tax breaks for businesses who are undertaking work to develop new reusable products or reusable versions of existing single use products, and robust monitoring of businesses to ensure that these regulations are meaningful and fully observed.

Deliver a Skills programme to support a Just Transition

Q17. What three skills do you consider will be most critical to supporting the Circular Economy?

1. Care
2. Repair
3. Community energy initiatives – for example the community energy project on Rathlin Island
4. Green energy technicians – for example developing expertise in harnessing solar power, tidal power, hydro-electricity, supporting green energy initiativesR
5. Green agriculture - Basic Income Support for Sustainability (BISS) - via BISS workers can apply for the Agri-Climate Rural Environment Scheme (ACRES)⁴².

By way of elaboration on our fifth key skill listed above, ACRES is Ireland's new agri-environment climate scheme under Ireland's CAP Strategic Plan. This new €1.5 billion flagship agri-environment scheme is a farmer-friendly scheme to help address biodiversity decline and delivers income support for up to 50,000 farm families in Ireland. The objectives of the Scheme are:

“3.1 To contribute to climate change mitigation and adaptation, including by reducing greenhouse gas emissions and enhancing carbon sequestration, as well as to promote sustainable energy

3.2 To foster sustainable development and efficient management of natural resources such as water, soil and air, including by reducing chemical dependency

3.3 To contribute to halting and reversing biodiversity loss, enhance ecosystem services and preserve habitats and landscapes

3.4 To improve the response of Union agriculture to societal demands on food and health, including high-quality, safe and nutritious food produced in a sustainable way, to reduce food waste, as well as to improve animal welfare and to combat antimicrobial resistances.”

⁴² Department of Agriculture, Food and the Marine, Ireland (2022). *PDF.js viewer*. [online] [www.gov.ie](https://www.gov.ie/pdf?file=https://assets.gov.ie/227620/fal23fc5-f259-43d4-ae40-eb9d243ebf4.pdf#page=null). Available at: <https://www.gov.ie/pdf?file=https://assets.gov.ie/227620/fal23fc5-f259-43d4-ae40-eb9d243ebf4.pdf#page=null> [Accessed 16 Mar. 2023].

In relation to this question, we would like to reiterate our definition of a just transition: ensure those who contribute to the economy in any way, both in paid and unpaid work, are not impacted negatively as we collectively move to a lower carbon economy. This requires the Department to move those skilled in high-carbon industries to reskill and move into low-carbon industries. However, industries that are already low-carbon but undervalued and underinvested in *need* similar protections and attention to ensure that they do not collapse.

Care is one of the most essential sectors of our economy – though undervalued long before the pandemic, the halting of paid and unpaid caring services due to the pandemic brought the economy to a stop in March 2020. The paid care sector is generally low-paid, part-time, precarious work. Women disproportionately work in the care sector and/or deliver unpaid care in the home, which contributes to many women's inability to access Statutory Sick Pay or proper employment contracts. The unpaid care sector, due to lack of proper support, negatively impacts on the carers' ability to do paid work and can be an emotional burden on the carer. The pandemic has only exacerbated these pre-existing conditions.

We would argue that, while skills and careers in STEM are important and deserving of investment, there should be just as big a focus on skills associated with care for this very reason. Care cannot be automated, and to properly prepare for the impending skills crisis in care, investment needs to be aimed at increasing development in skills associated with care. The 2019 Skills Barometer report predicted 'Caring Personal Services' to be a notable contributor to job growth in the next decade, yet there are no plans in this Strategy to deal with this forecasted demand. Even though it indicated that 'Caring Personal Services' was going to be one of the largest contributors to job growth in the next decade, it is incapable of predicting the skills required to meet that demand. This is echoed by the contents of the Strategy and the Report, neither of which prepares for the impending skills crisis in social care nor the predicted care crisis.

The WPG recommends that career pathways and pay progression are put in place for low-paid, precarious work like care, and that funding is increased for apprenticeships that are considered highly skilled yet require low-level qualifications, such as social care apprenticeships. Without proper childcare provisions, many women will not be able to participate in skills attainment, upskilling, and/or reskilling schemes. Investment in childcare and early years development would ensure that women would not miss the opportunity to develop their skills due to the lack of accessible and affordable childcare, as this is already a barrier to women's education and employment.

Care must be central to any skills programme to support a just transition. Other skills necessary to support a just transition are work on community energy initiatives, green

agriculture and green energy. There are a number of case studies that demonstrate the importance of connecting community and climate - for example, money from energy produced by wind turbines on Rathlin Island went back into the community⁴³. Supporting community workers and members of the community to align their work with climate initiatives is key. As mentioned in our response to Question 11, it is best that if green initiatives are not run by the state, then they must be run by the community.

Future delivery: Delivery of Circular Economy Strategy

Q18. Do you consider that government should play a role in assisting the transition to greater circularity through a dedicated Circular Economy delivery body?

Yes. The WPG argues that there should be a body responsible for the delivery of this Strategy, which should be led by Government, and incorporate climate experts and civil society that recognise the commitment to all Section 75 protections. This will give the Strategy momentum and ensure that commitments are delivered upon in a timely and efficient way.

Q19. What do you think a Circular Economy delivery body should look like? e.g. government led or a public-private partnership. Please provide a rationale for your answer.

The WPG believes that this body must be led by the government and public / civic society. It absolutely **must not be a public-private partnership**, as this approach runs the risk of being corruptible and used to benefit private companies that put growth above the public interest. Ideally the composition of this body should include climate experts and a large swathe of civil society, including the women's sector. It should be a cross-departmental, Executive-wide body, not led by any one Department - this will ensure wider Executive buy-in and avoid the risks of such a body being subject to the agenda or whims of an unco-operative Minister. This is becoming the norm across Executive Strategies, in service to the commitment to cross-departmental working in New Decade New Approach, and it would better embed Just Transition principles by having implications considered at the outset of any policy approach being decided.

6. Additional Comments

To conclude, the NI Women's Policy Group believes that a Circular Economy Strategy for NI is essential, but that the approach outlined by the Department for Economy is one that will not be sufficient to meet the goals we need to meet. We need to move

⁴³ BBC News, 2021, Rathlin Island: Aim to be Carbon Neutral by End of Decade, available at: <https://www.bbc.co.uk/news/uk-northern-ireland-57794383>

beyond an approach that centres economic growth, to take into account the gendered impacts of the Strategy and to centre the caring economy as well as manufacturing and agriculture.

Being continually mindful of developments and research in the area and global policy shifts that may have a beneficial impact, especially in light of the speed of research and development in the area. Also policy makers must be mindful that

“Secondary resources shall only complement the growing extraction of primary resources, while the responsibility for circularity is handed over from the state to individuals and entrepreneurs. A weak circularity excludes social responsibility and tends to reinforce unequal power relations. With a strong conceptualization of circularity, on the other hand, the producers and the state are responsible for creating a closed, material loop limited in size and space, based on the principle of fair distribution of resources.”⁴⁴

We urge careful engagement with the Community and Voluntary sectors throughout this process, a brave approach that is ambitious and wide-ranging, and one that centres the well-being of communities above economic performance.

ENDS

For any questions or queries relating to this submission, please contact:

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⁴⁴ Johansson, N. and Henriksson, M. (2020). Circular economy running in circles? A discourse analysis of shifts in ideas of circularity in Swedish environmental policy. *Sustainable Production and Consumption*, [online] 23, pp.148–156. Available at: <https://www.sciencedirect.com/science/article/pii/S2352550920300464> [Accessed 25 Mar. 2021].