



NI WOMEN'S BUDGET GROUP

NORTHERN IRELAND WOMEN'S BUDGET GROUP (NIWBG) RESPONSE TO THE DRAFT CIRCULAR ECONOMY STRATEGY FOR NORTHERN IRELAND

Department for the Economy (DfE)

**Prepared by Alexandra Brennan (Coordinator) of NIWBG
March 2023**

The Northern Ireland Women's Budget Group (NIWBG) is made up of organisations and individuals from the women's sector, trade union movement, academia and wider civil society in Northern Ireland, with the aim of implementing a gender equal economy. The members of the NIWBG scrutinise policy and budgetary matters with a gendered lens to bring attention to the different ways in which women and men are affected by government-level decision-making. It aims to provide policy- and budget-makers with policy analysis to secure substantive equality for women and men through the assessment of gender impact.

The NIWBG works with a range of organisations in Northern Ireland on devolved issues and with sister organisations in Wales, Scotland, England and Ireland on East-West and North-South issues.

We hope that our response to the consultation will be considered by the Department for the Economy when finalising the Circular Economy Strategy.

If there are any questions or comments regarding the NIWBG's consultation response, please direct them to the Coordinator for the NIWBG, Alexandra Brennan (info@niwbq.org).

General Comments

Introduction

The NIWBG welcomes the opportunity to respond to the Circular Economy Strategy for Northern Ireland. We believe that with this strategy, there is the possibility to change the way our economy not only interacts with the environment, but compliments it. Embedding concepts and commitments like a just transition, alternatives to 'growth'/GDP, the UN's Sustainable Development Goals (SDGs), and gender budgeting will be key to the success of our transition to a circular economy. Education and skills attainment is also crucial in meeting pre-existing and emerging needs in the labour market as we move to low-carbon, low-material footprint sectors. The NIWBG advocates for a caring, green, gender-equal economy for Northern Ireland, and these factors are all interlinked - we cannot have a caring economy without achieving gender and climate justice, and vice versa. Therefore, we promote legislation that is ambitious not only in preventing climate change, but in promoting a more sustainable and equal future for the people of Northern Ireland.

The NIWBG would also like to support and refer the Department to the response from the Women's Policy Group (WPG).

Just Transition

According to economist Anne Pettifor, a 'just transition' is a transition that "will make sure that workers do not pay the price for the economy's transformation away from dependence on carbon and other greenhouse gas emissions."¹ The NIWBG would go one step further, wanting a just transition that would ensure those who contribute to the economy in any way – both in paid and unpaid work – are not impacted as we collectively move to a lower carbon economy. The inclusion of a just transition can mitigate the human and economic costs of such a drastic change, generate employment in existing low-carbon sectors and create jobs for new and emerging low-carbon sectors.

In relation to this strategy, it is essential that a just transition is at the centre. By doing so, both people and planet will be prioritised and allowed to flourish throughout the transition to a circular economy. This is in line with the proposed vision of the strategy, and will also aid in Northern Ireland's commitment to achieving the UN's SDGs by 2030.

Alternative to 'Growth' and GDP

¹ Anne Pettifor (2019). *The Case for the Green New Deal*. pg. 17.

The purpose of a circular economy is to encourage reusing and repairing goods, to lower consumption (especially of first-use and single-waste products), and to ultimately lower our collective impacts on the environment. We are concerned that with a strategy aimed at implementing an economic model with transformation at its heart, it is so focused on growth. The issue with the concept of 'growth' is that it goes against one of the most basic laws of physics - energy cannot be created or destroyed, only transformed. Nicholas Georgescu-Roegen, an economist and mathematician, made the connection between the first law of thermodynamics and the economy: "For Georgescu-Roegen, the terms 'production' and 'consumption' obscure the fact that nothing is created and nothing is destroyed in the economic process: everything is simply transformed."²

The "ideology of endless expansion" is at odds with the finite nature of our ecosystem, and using Gross Domestic Product (GDP) as a tool to measure economic health not only contradicts this fact, but it does not come close to accurately describing the health of an economy. GDP is meant to measure the total value of goods and services produced and collective income and/or expenditure³. However, this paints a very limited picture of all of the elements that make up our economy and does not factor in well-being, equality, issues around disparity, environmental degradation/improvement, health, education, etc.

As we transition to a circular economy, we must move away from GDP and 'growth'. A circular economy is based on *transformation* instead of growth and consumption. While we move sectors and people into a more sustainable and green society, we must also update our understanding of the economy and its interactions with people and planet. Prioritising a measurement like the Genuine Progress Indicator (GPI) over GDP would be a positive move away from centring an economy around 'growth'. The GPI uses 26 indicators to determine economic health that take into account aspects like income inequality, non-market benefits that are not measured in GDP, negative impacts to people and planet such as the state of the environment, loss of leisure time, and health effects⁴.

UN's Sustainable Development Goals

Northern Ireland must play its part in achieving the 17 Sustainable Development Goals (SDGs) by 2030, and strategies such as this one need to be closely linked to this effort. While there is a mention of the SDGs in the draft strategy, it is a general comment with no elaboration on how this strategy will be used to work towards fulfilling Northern Ireland's commitment.

To meet the 17 goals by 2030, investment in both social and physical infrastructure is required. This strategy touches upon many ways in which physical infrastructure will change. However, the lack of importance given to changes needed in areas of social infrastructure and systemic

² Anne Pettifor (2019). *The Case for the Green New Deal*. pg. 109.

³ Bank of England (2019). *What is GDP?* (<https://www.bankofengland.co.uk/explainers/what-is-gdp>)

⁴ Maryland Department of Natural Resources (2022). *Maryland's Genuine Progress Indicator*. (<https://dnr.maryland.gov/mdgpi/Pages/what-is-the-GPI.aspx>)

inequality will hinder the ability of this strategy to tackle barriers to multiple SDGs as well as a transition to a circular economy. As noted in the SDGs, "...ending poverty and deprivations must go hand-in-hand with strategies that improve health and education, reduce inequality, and spur economic growth - all while tackling climate change and working to preserve our oceans and forests."⁵ This approach, along with this strategy, must facilitate collective and cross-departmental working.

Education, Skills, Training and Apprenticeships

Based on a working paper⁶ published by the Ulster University research team consisting of Prof. Ann Marie Gray, Prof. Joan Ballantine and Dr. Michelle Rouse, the Skills Barometer, used to determine skills that will be needed by new workers, only considers economic value in terms of productivity and may assign lesser economic value to skills needed for sectors such as care.

The Barometer's inability to view economic value outside of productivity is a major blindspot and the limited view of economic value and productivity is at odds with the principles of a circular economy. For example, while the 2019 Skills Barometer report⁷ 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.

An additional and significant blindspot in the Barometer's analysis is that upskilling is netted out of the forecast of future skills requirements. In a 2015 report on the Barometer⁸, it was mentioned that upskilling was not considered when predicting future skills requirements based on the belief that, "these individuals are already in the labour market, will remain with their current employers after training and do not represent additional supply to the labour market." Because upskilling is netted out of the forecast, the Barometer does not look at the benefits of increasing the skill set of those already in the workforce. The exclusion of upskilling from the Barometer's predictions means that women with low-level qualifications that need to upskill to perform their duties, like many in social care, are going to be disproportionately impacted.

STEM and Apprenticeships

In STEM sectors, there is a great gender imbalance – the low representation of women in these positions can be traced back to a gender imbalance in attainment of STEM-based skills. Many incoming low-carbon sectors that will be receiving investment through this strategy and others will be in STEM - for this reason, addressing gender imbalance is essential.

⁵ UN (2021). *The 17 Goals*. ([THE 17 GOALS | Sustainable Development \(un.org\)](https://www.un.org/sustainabledevelopment/))

⁶ Ballantine, J., Rouse, M. and Gray, A.M. (2021). *Gender Budgeting: Working Paper 2: Case Study: Apprenticeships in Northern Ireland*. ([Gender Budgeting-2.pdf \(ark.ac.uk\)](https://www.ark.ac.uk/gender-budgeting-2.pdf))

⁷ Ulster University Economic Policy Centre (2019). *NI Skills Barometer 2019* ([NI Skills Barometer 2019 information pack \(economy-ni.gov.uk\)](https://www.economy-ni.gov.uk/ni-skills-barometer-2019-information-pack))

⁸ Ulster University Economic Policy Centre (2015). *NI Skills Barometer Findings Report: "Skills in demand."* ([PowerPoint Presentation \(economy-ni.gov.uk\)](https://www.economy-ni.gov.uk/ni-skills-barometer-findings-report))

Gender segregation in the ApprenticeshipsNI and HLAs is a stark example of why it is important that concerted efforts are made to equalise STEM sectors. This is evident when looking at the estimated GVA for participants – for men, it is £78,400 per participant; for women, it is less than half of that amount at £35,900 per participant⁹. Additionally, the ‘Engineering’ ApprenticeshipsNI programme had a breakdown of 98% male participants versus 2% female participants, and the ‘Engineering & manufacturing technologies’ and ‘Science & mathematics’ HLAs have a breakdown of 90% male versus 10% female participants and 57% male versus 43% female participants, respectively¹⁰. The NIWBG supports efforts to rectify gender imbalances in STEM, and we recommend that solving gender inequality and low pay in ApprenticeshipsNI and HLAs are the foundations of this work.

A Caring, Green Economy

We would urge the Department to consider how investing in the care sector can help achieve a successful transition to a circular economy while strengthening our essential services and enhancing our communities and places. It is crucial that this strategy positions adult social care and childcare as not only an essential service but a sector that should be prioritised when it comes to investment.

By investing in a caring, green economy, as outlined by the Commission on a Gender-Equal Economy’s report, *Creating a Caring Economy: A Call to Action*¹¹, the strategy could tackle systemic inequalities while fulfilling the outlined objectives. The Commission’s report provides eight steps to securing a caring, green economy:

1. Re-envision what we mean by ‘the economy’ – The pandemic demonstrated how central care, both paid and unpaid, is to our economy. We need to reassess the economic value of care to reflect its importance to the maintenance of the economy.
2. Invest in social and physical infrastructure – It is crucial that investment social and physical infrastructure is cognizant of diverse needs and promotes equality and sustainability.
3. Transform the worlds of paid and unpaid work – This would require not only prioritising investment in STEM, but fixing low-pay and precarity in other valuable sectors. This would help correct gender inequalities in the labour market and gender imbalances in the sharing of paid and unpaid work.
4. Invest in a caring social security system which is based on dignity and autonomy – This step must be addressed to alleviate pressure on paid and unpaid carers and mitigate an impending care crisis.

⁹ Ballantine, J., Rouse, M. and Gray, A.M. (2021). *Gender Budgeting: Working Paper 2: Case Study: Apprenticeships in Northern Ireland*. ([Gender Budgeting-2.pdf \(ark.ac.uk\)](#))

¹⁰ Ibid.

¹¹ Commission on a Gender Equal Economy (2020). *Creating a caring economy: a call to action*. ([WBG-Report-v10.pdf](#)).

5. Transform the tax systems across the UK – While this step lies outside the remit of devolved powers, the NIWBG would advocate for progressive tax reform at the Westminster level to produce revenue to be invested in a stronger social security system as well as in social and physical infrastructure.
6. Refocus the overall fiscal and monetary policy framework to build a caring economy – The NIWBG would advocate for fiscal and monetary policy at the Westminster level that promotes gender equality, well-being and sustainability.
7. Work to develop a global trade system that is socially and environmentally sustainable – The NIWBG wants to ensure that post-Brexit trade does not cause a degradation of human rights, environmental and labour standards. Ensuring that public services are excluded from trade and investment deals is also crucial to securing a caring, green economy in Northern Ireland.
8. Work to transform the international economic and financial system – It is necessary that caring, green economies are adopted worldwide to achieve significant change regarding equality and sustainability.

The recommendations from the Commission's report are echoed in the content of the Women's Policy Group's Feminist Recovery Plan¹², which was fully updated and relaunched in July 2021. The NIWBG believes it is crucial that the content of the Commission's report and the Feminist Recovery Plan inform the Department's strategy.

Gender Budgeting

Equality and human rights must be at the heart of the transition to a circular economy. The application of gender budgeting is crucial to a successful just transition. Gender responsive budgeting tools can help recognise systemic disadvantages and lead to budgets and policies that promote greater gender equality. If implemented, policymakers would have to consider the gendered impacts of spending and revenue raising decisions and how to use these mechanisms to bring about gender equality. Women's intersecting identities are also included in this analysis and policymakers are expected to promote these areas of equality as well.

A scoping study¹³ commissioned by the Equality Commission considers how gender budgeting tools can be used in meeting Section 75 requirements and how the international models have useful application in Northern Ireland. Quinn concludes that applying impact assessment processes to mainstream gender equality is '...a worthwhile enterprise, both in terms of the recognised demand for a deeper application of the Section 75 duties to the budget process but also in terms of the wealth of methodologies associated with gender responsive budgeting which are adaptable to the Northern Ireland context' and 'vital [at] all levels of government ... as a means of fulfilling Section 75 duties.'

¹² Women's Policy Group (WPG) (2021). *NI COVID-19 Feminist Recovery Plan: Relaunch - One Year On* ([WPG-COVID-19-Feminist-Recovery-Plan-Relaunch-One-Year-On.pdf \(wrda.net\)](#))

¹³ Quinn, S. (2013). *Equality Responsive Budgeting* ([Equality Responsive Budgeting \(equalityni.org\)](#))

Gender budgeting is transformative, assists in transparency and accountability, and is of value in delivering economic benefits, equality and rights, and securing sustainable peace. Because of this, plans for a just transition must be embedded in gender responsive budgeting mechanisms. To make a successful transition to a circular economy and response to the climate crisis, a just transition must be at the core.

We recommend that gender budgeting expertise be incorporated into the implementation of the strategy and other investment plans to ensure that gender inequalities are not exacerbated, but rather mitigated over the next decade. The NIWBG believes that gender budgeting is crucial to promoting gender equality and securing a caring and green economy. Please see [Annex 1](#) for more on gender budgeting.

Draft Circular Economy Strategy Consultation Questions

1. Name

Alexandra Brennan

2. I am responding

On behalf of an organisation

3. Name of your organisation

Northern Ireland Women's Budget Group

4. What sector are you from?

Social Enterprise/Third & Voluntary 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.

5. Is this vision the right vision?

While we agree with the overall sentiment of this vision, we feel there are elements that are missing that are crucial in ensuring that this strategy, and the vision that guides it, is ambitious and focused. Most importantly, the vision must align with the vision and aims of the Climate Change Act. The Act was progressive, targeted and the first in the world of its kind to include gender equality - prioritising people and planet must be central to this as it is in the Act. To keep in line with the Act, the vision must include the necessary target of reaching net-zero by 2050. We note that the year itself is in the vision, but by excluding the commitment to reach net-zero, the vision of the strategy is weaker. It is important that other Northern Ireland legislation reinforces the commitment made in the Climate Change Act and by other nations not only for the sake of preserving our climate, but because it's an indication of ambition. Weak commitments to a previously agreed goal will paint Northern Ireland as a place that cannot adapt to necessary changes and puts us at risk of losing out on investments to other nations with more ambitious targets.

Target

According to the Circularity Gap Report, each person in Northern Ireland is consuming c. 16.6 tonnes of resources per year. This is our individual material footprint. With the earth's finite supply of resources and our current production and consumption patterns, we must start to rethink our relationship with resources and reduce our demand for them. To live sustainably, the United Nations (UN) recommends that we should only be using an average of 6-8 tonnes of resources per year.

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

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

We agree with halving our material footprint by 2050, however, we feel that this is a very individualist approach. In conjunction with this target, there needs to be a target with a larger focus on reducing the material footprint of the industries that are most pollutant. In our current economy, only 7.9% of the resources we used are circled back into the economy, which means that more than 92% of our resources come from virgin sources¹⁴. High carbon-emitting sectors like construction and agriculture are significant contributors to Northern Ireland's high material footprint. For this reason, we need a target that focuses on reducing the material footprint of high-contributing industries.

In terms of targeting the individual contribution to our material footprint, we need to ensure that while we work towards the goal of 8 tonnes per person by 2050, a just transition informs and drives this target. As mentioned previously, a just transition protects those in paid and unpaid work from possible rights degradation as we move from to a low-carbon, low-material footprint, circular economy.

Proposals for Change

Develop and implement a programme to support and promote behaviour change

Our behaviour and individual choices about what, where and how we purchase stuff, how long we use it for, whether we can reuse or repair it, and when and how we dispose of it, will ultimately determine if Northern Ireland can successfully transform to a Circular Economy.

A recent report issued by the House of Lords 'In our Hands' urged Ministers to lead a public campaign using all government levers to guide public behaviour change in order to stop biodiversity loss and achieve net zero.

Changing mindsets, business models and developing new products and services is going to be a complicated task, especially for Northern Ireland, which has many SMEs with limited time and resource.

This level of intervention is required to transform our relationship with resources.

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

¹⁴ Circular Economy (2022). *The Circularity Gap Report: Northern Ireland* (https://assets.website-files.com/5e185aa4d27bcf348400ed82/62d70ab592e72955f9e5b18a_The%20Circularity%20Gap%20Report%20-%20Northern%20Ireland.pdf)

**Please put the following in order of priority.
(Ranking scale 1 = most preferred / 4 = least preferred)**

- *Provide greater transparency and clarity on what government is doing to show commitment and create momentum.*
- *Provide information and tools to increase awareness and help change attitudes.*
- *Use regulatory and financial incentives to increase affordability and availability of sustainable options.*
- *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.*

If the strategy follows the guidelines of a just transition the efforts listed above would all be prioritised as we move towards a circular economy. However, we firmly believe that for us to successfully make this transition, this strategy needs to take a whole of society approach. Currently, there is a heavy emphasis on business and social enterprise, as well as a traditional view of physical infrastructure. This follows a pattern of other strategies prioritising and focusing on business and construction - sectors that traditionally have a workforce made up mainly of men - over other low-carbon, underinvested, and women-dominated sectors like care.

We have raised this issue in our response to the [2021 Budget \(DoF\)](#), [the Programme for Government Outcomes Framework 2021 \(NIE\)](#), [the Skills Strategy \(DfE\)](#), [the Investment Strategy for Northern Ireland \(SIB\)](#), [the call for evidence on investment in Northern Ireland \(NIAC\)](#), and [the 10x Performance Management Framework \(DfE\)](#). We firmly believe that in order to change our linear economy to a circular one, this strategy must give equal priority to other sectors that are already low-carbon but are struggling due to underinvestment. Additionally, the team that develops, implements and monitors this strategy needs to engage with civil society and the community and voluntary sector, specifically on the inclusion pillar.

Create clusters and networks to raise awareness and facilitate collaboration

Many of the barriers to circularity will not be addressed without the utilisation of existing and new clusters and networks which will support industry to research, design, test and deliver transformative solutions.

Clusters are a geographic collection of interconnected companies producing similar or related goods/services that are innovation-oriented, seeking to benefit from integration across businesses.

Networks are an alliance of organisations (public/private or other) seeking to work together to achieve an economic goal, this could be within or outside a cluster. Networks may involve organisations within the same sector or across sectors which belong to the same value chain.

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

Existing clusters and networks that already deliver transformative solutions for increased circularity are trade unions. Unions deliver courses on understanding environmental terminology, how to review and develop workplace environmental policy, building alliances internally and externally to bring about green policies, for example¹⁵. Additionally, unions have extensive connections with multiple industries, making them well-suited to deliver transformative solutions for increased circularity.

We would also like to reiterate our point about the strategy team engaging with and valuing the expertise of non-businesses/social enterprises. The community and voluntary sector have well-established networks that already do work around advocating for alternative methods of developing 'green' budgets and policies.

This strategy should be investing in the sectors that are already low-carbon and 'net-zero,' such as care and education/skills attainment. These non-growth-oriented sectors are not captured in GDP measurements, but their contributions to our economy are immense. For example, unpaid carers alone save the government £4.6 billion a year - the cost of a second NHS¹⁶. Through education and skills attainment, we are investing in our future economy and the future of our labour force. However, we have failed to properly fund such important, existing, low-carbon sectors. Fewer than 1 in 3 carers said that they could afford their bills without struggling financially and 27% of carers said that they were struggling to make ends meet, which is the second highest response in the UK behind Wales¹⁷. In education, Northern Ireland spends the lowest per pupil in the UK at £6,400 per student, which is 3% lower than in 2011-12¹⁸. To ensure that these low-carbon sectors continue to contribute to our new circular economy and deliver transformative solutions for increased circularity, this strategy must invest and value this type of infrastructure.

We have concerns around increased engagement with clusters of businesses that stand to profit from decisions made through this strategy. There is a possibility that this question invites lobbying from clusters of businesses that would stand to benefit from additional money offered through potential transformative solutions. How will the investment in clusters and networks be monitored? How will it be determined how much is invested in clusters and networks to support the creation or circulation of transformative solutions? We firmly believe that there should be regulations on any financial scheme associated with this strategy and robust monitoring of delivered funds. This could be done similar to a 'polluter pays' principle, which calls for those

¹⁵ <https://www.ictuni.org/courses/climate-crisis-and-workplace-green-skills-trade-unionists>, <https://nipsa.org.uk/nipsa-in-action/training>, <https://www.learnwithunite.org/environment/environmental-training/>, <https://learning.unison.org.uk/events/climate-crisis-and-green-skills/>

¹⁶ Buckner, L. and Yeandle, S. (2015). *Valuing Carers 2015: The rising value of carers' support*. ([cuk-valuing-carers-2015-web\(2\).pdf](#))

¹⁷ CarersNI (2022). *State of Caring 2022: A snapshot of unpaid care in Northern Ireland* (<https://www.carersuk.org/media/xjzfw4x/cni-soc22web.pdf>)

¹⁸ The Institute for Fiscal Studies (IFS) (2021). *School spending per pupil highest in Scotland, lowest in Northern Ireland* (<https://ifs.org.uk/news/school-spending-pupil-highest-scotland-lowest-northern-ireland>)

who produce pollution to pay the costs of managing it to prevent harm to human and environmental health¹⁹.

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

In our response to the previous question, we outlined why it is so important that this strategy links in with low-carbon sectors like care. We propose the establishment of a 'Green Economy Network' for carers - one for paid and unpaid social care workers and one for childcare workers.

Embed circular economy principles in public procurement

In Northern Ireland, the public sector procurement has buying power in excess of £3 billion per annum. This provides strong potential to shape markets and behaviours through the development of specifications and contract management clauses to retain the value of materials for example purchasing refurbished computers or supporting leasing business models. This creates opportunity to influence the maintenance of the public estate, supply contracts including food and waste as well as delivery of infrastructure and capital projects.

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

The values of a government can be seen in how it uses its budget and public sector procurement provides the opportunity to deliver not only sustainable development but also equality, so meeting statutory duties and advancing towards securing the Sustainable Development Goals. As Peter Robinson wrote in his Foreword to joint Equality Commission and Central Procurement Directorate guidance, *'The leverage of public procurement to contribute to delivering greater equality and social inclusion as well as sustainability goals should not be underestimated.'*²⁰

The ECNI/CPD guide²¹ shows how equality can be considered in procurement, including through contracting processes, and how maximum impact can be secured. For example, considering the needs of women and men, disabled people and older and younger people can enhance the built environment's contribution to all people reaching their potential and flourishing. Equality considerations can ensure a diverse, inclusive workforce and tackle inequalities in recognising the contribution of paid and unpaid care work (see further in earlier comments in the **Caring, Green Economy** section and in the answer at **Question 17**), including in the identified sectors of construction and tourism. Screening and other assessment

¹⁹ The London School of Economics and Political Science (LSE) (2022). *What is the polluter pays principle?*

(<https://www.lse.ac.uk/granthaminstitute/explainers/what-is-the-polluter-pays-principle/#:-:text=The%20polluter%20pays%20principle%20is,human%20health%20or%20the%20environment>)

²⁰ Peter Robinson, then Minister for Finance and Personnel and Chairman of the Northern Ireland Procurement Board in his Foreword to ECNI and CPD (2008) [Equality of Opportunity and Sustainable Development in Public Sector Procurement](#)

²¹ ECNI and CPD (2008). [Equality of Opportunity and Sustainable Development in Public Sector Procurement](#) including flow chart page 10.

tools can also identify differences in food and lifestyle choices, transport use and other decisions people make, understanding which is crucial in meeting equality requirements as well as working towards sustainable development.

The strategy's vision is to benefit business, people and planet and we note that the consultation document does suggest that marginalised groups including people with a disability could be offered enhanced training and employment opportunities. However, we are surprised to see that the Department's screening document, despite recording, for instance, gender imbalances in employment, consistently concludes that there are no equality outcomes. We would encourage the Department, in meeting its Section 75 requirements, to consider the significant opportunities not only for sustainable development but also for equality of opportunity, such as those suggested above. A working paper published by Ulster University²² identifies the need for government's strategic plans better to reflect the needs of women and men and an explicit statement of the financing of the actions delivering gender equality will be required in securing the SDGs²³.

Create and support platforms and hubs to share goods and materials

To improve the use of resources and retain their value, people and businesses need to know what is available, where it is and what condition it is in. Information is required for people and business to make choices about what they want to access. This can be provided through online platforms for typical fast moving consumer products e.g. the Olio platform which is dedicated to helping stop food waste within the UK. It can also be provided for industrial materials through established platforms such as International Synergies. We want to create more platforms and hubs to share products and materials.

11. 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?

We strongly support the creation of platforms like Olio that encourage sharing and reusing of products and materials. In Belfast, there are community-led initiatives that facilitate this sort of sharing and reusing like the Belfast Tool Library²⁴. Alongside services like Olio and the Belfast Tool Library, we would also support the creation of local initiatives to educate the public on how to repair and/or alter clothes for example. Investment in such skills could reduce waste and prolong the life of materials already in use.

It should be noted that the platforms that work best to facilitate the sharing and reusing of products and materials are ones that are *for* the community, *by* the community. When this type of working becomes privatised, like Uber or Airbnb for example, profit is prioritised over people

²² Ballantine, J., Rouse, M., Gray, AM, Turtle, K. (2023) *Gender Budgeting Working Paper 3: Gender Audit of the Northern Ireland Programme for Government 2016-2021* ([Gender Budgeting-3.pdf](#))

²³ UN (2021). *17 Sustainable Development Goals, Indicator 5.c.1* ([UN SDGs Global Indicator Framework](#))

²⁴ Belfast Tool Library (<https://www.belfasttoolibrary.com/what>)

and leads to exploitation of workers through zero-hour contracts and low pay. This strategy needs to invest in community-led platforms and initiatives, not those of big business.

A just transition must be at the centre of developing support for a societal shift towards sharing and reusing products and materials.

Maximise the value of materials locally

When products and materials are kept in use, it retains the maximum value of those materials and components, reducing the overall demand for material extraction to make new products. We can do this by increasing the repair and reuse sector, doing more with natural bio-based materials locally available as well as growing our reprocessing sector.

The European Commission established the 'right to repair' for consumers and similar regulations have been introduced for GB.

The 'right to repair' regulation requires manufacturers of household appliances such as dishwashers, washing and drying machines, refrigerators and televisions to ensure their products are repairable for at least ten years through providing repair manuals and making parts available.

12. 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?

Public awareness and investment are essential in encouraging and facilitating society to extend the life of products and services to keep materials and resources in use for longer. Investment in the infrastructure that will allow for this will be key - this refers to infrastructure in the non-traditional sense, where we are looking for investment in services that would not only jumpstart this sort of consumption but would maintain it. This could be something like the Belfast Tool Library and/or courses on how to repurpose waste.

Besides public awareness and investment, targeted measures to increase the purchase of items that can be reused/repurposed should be employed. This could be realised through a 'green' tax on single-use, *non-essential* items while also giving a tax-break on items that are longer-lasting/reusable.

We recommend that the Department look at the free reusable period product scheme from Belfast City Council²⁵. While only one item is given per registrant, this allows people to test out products that they may have been curious about but did not want to spend the money on. These products tend to be more expensive than a typical box of single-waste tampons or pads, but they are significantly less waste and are more cost-effective in the long-term. It is estimated that

²⁵ Belfast City Council. *Reusable, environmentally-friendly period products* (<https://www.belfastcity.gov.uk/free-period-products>)

the average lifetime cost of single-waste period products are £4800; a new menstrual cup every decade throughout a lifetime, for example, is £100²⁶. As well, switching from tampons to a reusable method like the menstrual cup can cut carbon impact from period products by 16 times²⁷. This is just one example of encouraging single-use waste while employing just transition principles, ensuring that everyone can afford essential items such as period products.

Establish a Circular Economy funding programme

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

13. Which of the following interventions should be a priority focus for government funding?

**Please put the following in order of priority.
(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

While we have ranked the following interventions, we take significant issue with the list provided. We strongly believe that the first and second interventions, *environmentally focused solutions* and *carbon emissions reduction*, should underpin all of the items on this list and the entirety of the strategy. Additionally, aspects of *digitisation and technology* will help in the creation of *circular supply chains*; however, not all *digitisation and technology* will aid in achieving the aims of this strategy. For us to properly evaluate the priority focus for government funding, we need an in-depth understanding of their role in the strategy. Based on this list, all of the interventions should be funded and prioritised; it would be nearly impossible to achieve any one of the items listed without simultaneously funding and prioritising the others.

14. What funding instruments do you consider would be most appropriate in years 1-3?

²⁶ Royal Society of Chemistry (2021). *Single-use plastic in period products*. (<https://edu.rsc.org/feature/single-use-plastic-in-period-products/4013167.article#:~:text=The%20charity%20Bloody%20Good%20Period,on%20the%20alternatives%20out%20there>)

²⁷ Zero Waste Scotland (2023). *The carbon impacts of menstrual products* (<https://www.zerowastescotland.org.uk/research-evidence/carbon-impacts-menstrual-products>)

**Please put the following in order of priority.
(Ranking scale 1 = most preferred / 3 = least preferred)**

1. Blended finance (i.e. a mix of repayable and non-repayable finance)
2. Grants and subsidies
3. Loans

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

We highly recommend that with any funding instruments, there is a thorough assessment carried out of those receiving money through this strategy. We recommend that gender budgeting tools are used in all areas of this strategy as mentioned in our **General Comments** section, but we emphasise its importance here. The funds used to enable the success of Circular Economy solutions must help business and people transition to this type of economy, but it also must promote the equality of those who faced systemic disadvantage at the hand of our current and soon-to-be previous economic model. This would be in line with recommendations from the UN's SDGs and would help in the achievement of this international commitment.

The Department must prioritise community organisations and local businesses - specifically, non-repayable grants should be given solely to local, small businesses who will need the support to begin this process. A crucial aspect of determining recipients of funds should include an assessment of 'green' practices - waste procedures, profits, investment in green products, etc.

Create a regulatory framework that enables circular solutions to become the norm
Regulations, taxation and enforcement can further reduce waste and improve resource efficiency.

For example, the European Commission rules to establish the 'right to repair' for consumers. These regulations will affect design, manufacturing and distribution of all applicable goods in Northern Ireland and will facilitate greater reuse and repair of such products.

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

We refer to our answer to Question 12, where we recommend the creation of a 'green' tax on non-essential single-waste items and a tax-break for longer-lasting, reusable items. This tool, in keeping with just transition principles, would give incentives for companies to stop producing

single-use products as well as give incentives to individuals to purchase items that can be reused and repaired.

We want to see tight regulations on companies to increase compliance with EU guidelines and guidelines specific to Northern Ireland, whether or not they are in receipt of public money. If there is a low level of compliance with regulations, a fine or charge proportionate to the profits of that company must be administered. This means that a fine or charge will be different for a local business compared to a multinational corporation.

We stress that EU regulations are enforced where 'applicable,' but we need to fill the gap in regulations where EU law is not applicable in Northern Ireland. A review should be undertaken to identify these gaps, and the Department should engage with key experts in academia and civil society to determine how these gaps should be filled specific to Northern Ireland.

Deliver a Skills programme to support a Just Transition

Unless we plan, anticipate and resource for the transition to a Circular Economy, skills shortages could derail long-term goals for circularity and jobs growth.

As we progress into the 4th Industrial Revolution, some jobs will be lost in traditional sectors and the demand for new skills will increase, for example the demand for diesel engineers will decrease while the demand for those skilled in electric vehicles will increase.

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

1. Care
2. Community energy initiatives
3. Green agriculture
4. Green energy technicians

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 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 and the cost-of-living crisis have 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 NIWBG 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 multiple case studies that demonstrate the importance of connecting community and climate - for example, the Rathlin Development and Community Association (RDCA)²⁸ has been instrumental in facilitating community-led sustainable energy development. 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.

To encourage 'greener' agricultural methods, the Republic of Ireland have created a scheme to address biodiversity decline through farming, providing income support to up to 50,000 farming

²⁸ The National News (2021). *Cop26: Rathlin Island to use wind and waves to become carbon neutral by 2030*. (<https://www.thenationalnews.com/world/uk-news/2021/08/21/cop26-rathlin-island-to-use-wind-and-waves-to-become-carbon-neutral-by-2030/>)

families²⁹ While there are a few schemes to harness solar power, hydro-electricity and other green initiatives, there are not enough electricians to fulfil the demand. It is crucial that those entering the field and those already working the field are upskilled to work in these newer sectors.

Delivery of Circular Economy Strategy

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

Yes

No

Don't Know

19. What do you think a Circular Economy delivery body should look like? E.g. government led or a public-private partnership.

We agree that there should be a delivery body, but we are strongly against a public-private partnership. Government and key stakeholders from civil society should lead on the Circular Economy delivery. When private businesses are involved, there is significant ability for said businesses to prioritise their interests and profits and direct the strategy to their benefit. Those who stand to gain from the benefits from this strategy, such as additional investment, should not be in a decision-making and/or monitoring role.

In terms of civil society members that should be involved, it is crucial that there is extensive representation from environmental groups, equality and human rights organisations, and community workers. In terms of government involvement with this body, DfE will lead the delivery as the strategy lies within this department. However, we need extensive cross-departmental working to ensure that all areas of our society and economy successfully transition to a circular economy. Improved cross-departmental working was a commitment in the *New Decade New Approach (NDNA)*³⁰ agreement and should be prioritised.

²⁹ Republic of Ireland Department of Agriculture, Food and the Marine (2023). *Agri-Climate Rural Environment Scheme (ACRES)*. (<https://www.gov.ie/en/service/f5a48-agri-climate-rural-environment-scheme-acres/>)

³⁰ *The New Decade New Approach Deal* (2020).

(https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/856998/2020-01-08_a_new_decade_a_new_approach.pdf)

ANNEX 1



BRIEF ON GENDER BUDGETING

Budgetary processes and spend are far from 'neutral' – policies emanating from the Programme for Government and budgetary decisions have gendered consequences, whether they be intended or not. By taking a 'gender neutral' stance, decision-makers are oblivious to the complexities between the experiences of women and men and reinforce systemic disadvantages faced by women and other groups.

What is Gender Budgeting?

Gender budgeting is the tool that can help recognise systemic disadvantages and lead to budgets and policies that promote greater gender equality. If implemented, policy makers would consider the gendered impacts of spending and revenue raising decisions and how to use these mechanisms to bring about gender equality. Women's intersecting identities are also included in this analysis and policy makers are expected to promote these areas of equality as well.

In [Gender budgeting: Working paper 1](#), our partners Dr. Joan Ballantine, Dr. Michelle Rouse and Professor Ann Marie Gray highlight that, "*Northern Ireland lags significantly behind other devolved UK administrations and other OECD countries,*" where gender budgeting has "*made a significant contribution to addressing gender inequalities, the elimination of unequal outcomes and to increasing women's participation in civic and political life.*"³¹

It is important to note that gender budgeting is not about allocating more funds to women but about making sure the available resources have maximum impact. The [European Women's Lobby](#) breaks down the realities and misconceptions about gender budgeting as follows³²:

Gender budgeting is about:

- *Including a gender perspective into budget planning and analysing budgets taking into account their impact on women and men, girls and boys.*
- *Introducing a gender perspective into the entire budget, including seemingly "gender-neutral" budget lines.*
- *Reprioritising and refocusing of spending and restructuring of taxation with a view to promote equality.*

Gender budgeting is not about:

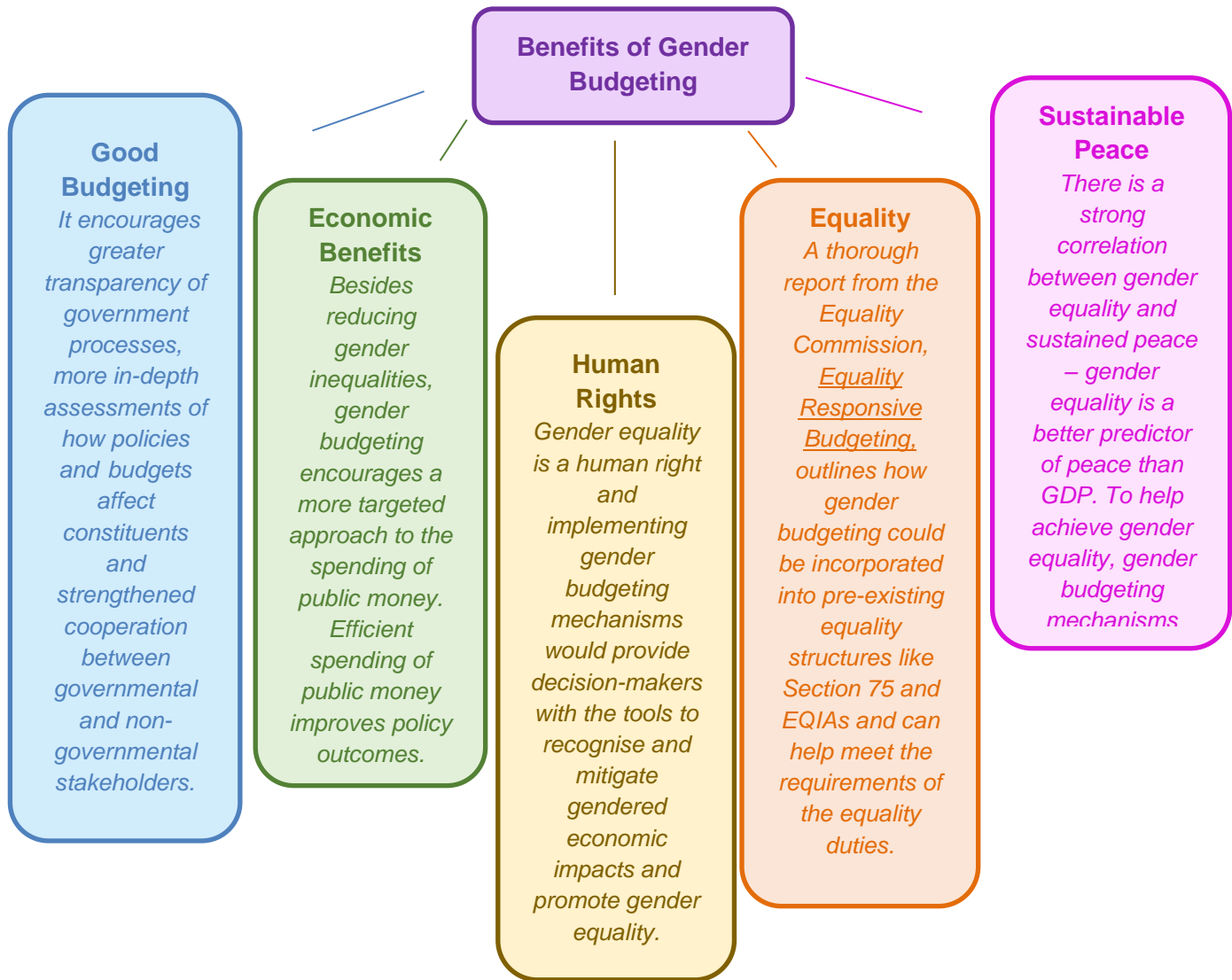
- *Creating separate budgets for women.*
- *Only looking at the parts of the budget which have a social content or that are explicitly gender-related.*
- *Demanding more spending.*

³¹ Ballantine, J., Rouse, M. and Gray, A.M. (2021). *Gender Budgeting: Working Paper 1: What does the literature tell us? Lessons for Northern Ireland (NI)*. ([Gender Budgeting-1.pdf](#))

³² European Women's Lobby. *What is Gender Budgeting?* ([What Is Gender Budgeting.pdf](#))

Why implement Gender Budgeting?

Gender budgeting is transformative, enhances transparency and accountability, and is of value in delivering economic benefits³³, rights and equality³⁴, and securing sustainable peace³⁵.



³³ Himmelweit, S. (2002). 'Making visible the hidden economy: the case for gender-impact analysis of economic policy,' *Feminist Economics*. 8 (1), 49-70.

³⁴ Quinn, S. (2013). *Equality responsive budgeting*. ([Equality Responsive Budgeting \(equalityni.org\)](http://equalityni.org))

³⁵ Fernanda Espinosa, M. (2020). *Peace Is Synonymous With Women's Rights*. (<https://www.un.org/en/un-chronicle/peace-synonymous-women%E2%80%99s-rights>)