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**Sent:** Friday 11 June 2021 16:42  
**To:** circulareconomy  
**Cc:** Matt Houlihan (mahoulih)  
**Subject:** Cisco Consultation Response - National Circular Economy Strategy  
**Attachments:** circular-economy-consultation(1).pdf

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To The Circular Economy Division,

Cisco is pleased to submit our response to the consultation request pertaining to the National Circular Economy strategy. We have kept the response concise and we have suggested some recommendations for your consideration as part of the strategy.

Please do not hesitate to contact myself or Matt Houlihan if you have queries in relation to this submission.

- Matt Houlihan, Director of Government & Corporate Affairs UKI, [mahoulih@cisco.com](mailto:mahoulih@cisco.com), +44 7482 372 582
- Brian Jordan, Head of Innovation & Industry Solutions, [briajord@cisco.com](mailto:briajord@cisco.com), +353 87 3749241

Wishing you a pleasant weekend.

Warm Regards  
Brian

**Brian Jordan**

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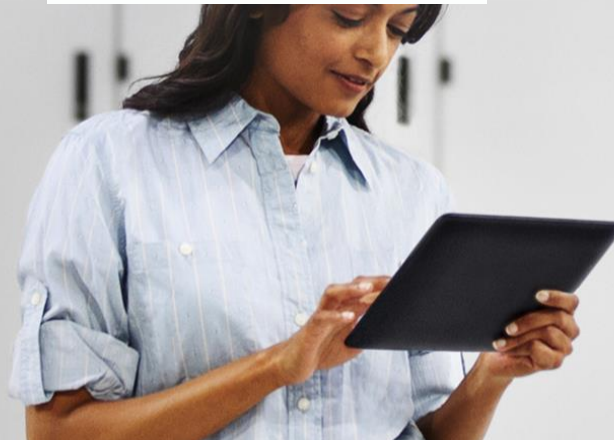
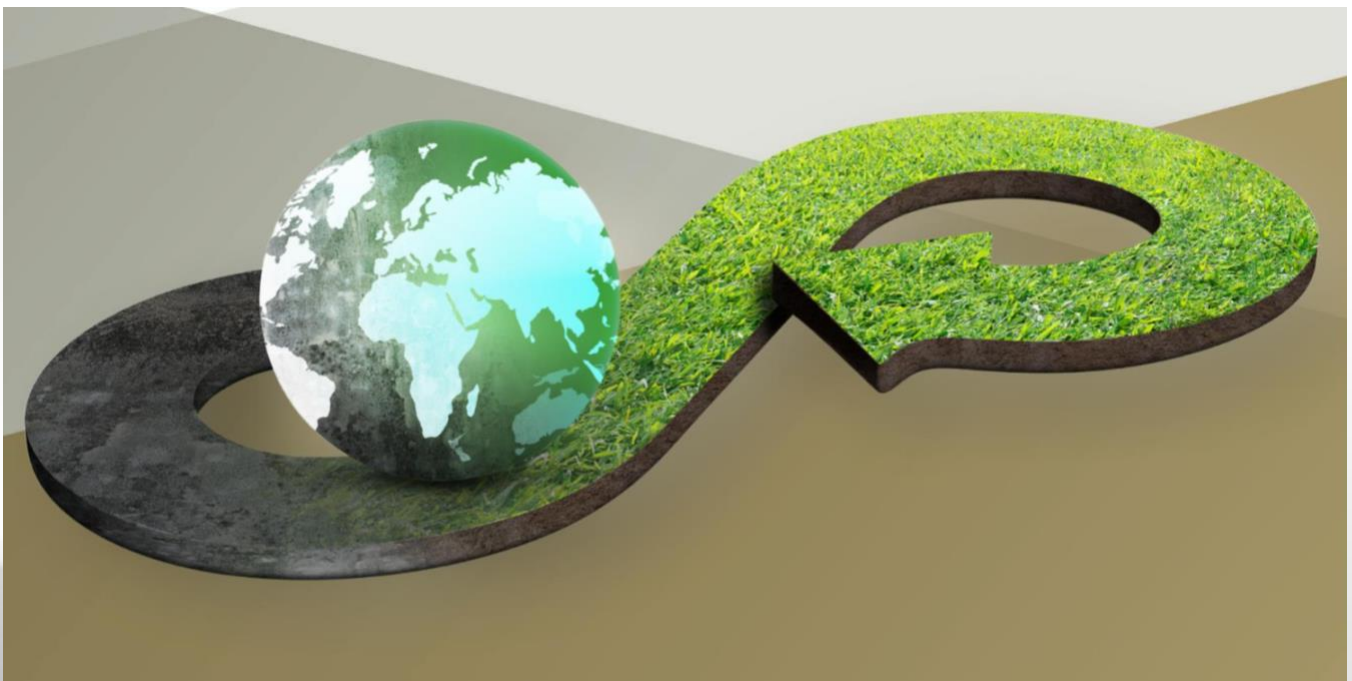
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# Cisco Response to Ireland's Whole-of-Government Circular Economy Strategy

11<sup>th</sup> Jun 2021



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# Disclaimer

**Thank you for the opportunity to submit this response to this Consultation Process. Cisco is not responsible for any inadvertent errors in our response.**



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## Introduction

Cisco welcomes the opportunity to submit comments to this timely Public Consultation on Ireland's circular economy strategy.

Cisco wants to be a constructive stakeholder to the European Commission and the Irish government and to be seen as a key partner to our customers as they themselves are working to meet sustainability targets. We have a long-standing commitment to the circular economy, as recognised by leading industry analysts like Barron's and Gartner. We want to make sure that policy measures help us enhance our existing actions and that the EU retains a strong focus on ICT as an enabler.

### Cisco's circular economy vision

- The rate at which our society is consuming natural resources is outpacing our ability to regenerate and restore them. As Cisco we aim to decouple our business growth from the consumption of finite resources, design waste out of the system and transition to renewable energy.
- Our holistic approach extends from how we design, build, and deliver products, to how we manage those products for multiple lifecycles and deploy new 'as-a-service' business models to facilitate a circular model.
- This includes our programs to repair and replace equipment in the field, take back equipment at the customer after end of use, and sell certified remanufactured equipment through Cisco Refresh. As we transition towards 'as-a-service' this will be further enhanced; as products remain in our ownership, we will be sure to get them back and our incentives to design for durability and upgradability for a longer lifespan will be embedded in our business model.
- We are also increasingly incorporating recycled content into our products, minimizing the need to harvest new resources, supporting the growth of supply chains for recycled content.
- We also support our customers in their own transitions to a more sustainable and environmentally friendly business model. From agriculture to fashion, to smart cities, buildings and e-mobility and the transition to renewable energy, digital technologies such as collaboration, IoT, and AI have significant potential to enable every private and public sector vertical to reduce their emissions, improve their resource efficiency and switch to more circular business models.
- ICT has the potential to slash global greenhouse gas (GHG) emissions by 20% by 2030, with one study showing that the emissions avoided through the use of ICT are nearly ten times greater than the emissions generated by deploying it.

## Summary of Recommendations

TOPIC AREA	RECOMMENDATION 1	RECOMMENDATION 2
Key Strategy Objectives	National Strategy for secondary materials market	
Strategy Ambition	No additional comments	
Measuring Progress	No additional comments	
Public Awareness	Case studies	
Awareness Measures	Sectoral design thinking workshops	Provision of supplier guide templates
Stakeholder Engagement	Extend stakeholder working groups to include ICT representatives	
Green Procurement	Green public procurement criteria should score the supplier on their commitment to setting science-based targets or their commitment to a 'Low Carbon Pledge'	
Economic & Social Benefits	No additional comments	
Regulatory Barriers	No additional comments	
Non-Regulatory Barriers	No additional comments	
Green Government Procurement	Green public procurement criteria should score the supplier on their commitment to setting science based targets or their commitment to a 'Low Carbon Pledge'	
Government Actions	No additional comments	

TOPIC AREA	RECOMMENDATION 1	RECOMMENDATION 2
Sector Insights	No additional comments	
Policy Areas	No additional comments	

## Key Strategy Objectives

*Q: Do you agree with the draft Strategy’s proposed key objectives? In your view, are there further or alternative objectives that should be included?*

The stated objectives to provide a national policy framework for Ireland’s transition to a circular economy are comprehensive and necessary. In Cisco’s opinion, ensuring a just transition with social equity will require careful planning, and timely policy support.

The objectives will require detailed ‘road-mapping’ for every sector to identify both positive and negative impacts on employment along with detailed business modelling to assess the likely economic impacts. The success of the plan may well depend on the provision of circular material substitution knowledge to product manufacturers (circular design) and the incubation of a market for secondary materials prior to policy implementation.

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*Cisco Recommendation – Develop National strategy for secondary materials market*

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**Delivery of the national infrastructure required for secondary material markets across all sectors should be considered as a top-level objective. The lifecycle of products will need mature routes for decomposing products into raw materials and a secondary materials market for the next journey of that material.**

## Strategy Ambition

*Do you agree with the overall level of ambition set out in the draft Strategy? If not, is further ambition needed or is the draft Strategy overly ambitious?*

Cisco agree with the overall level of ambition as set out in the draft strategy document.

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## Measuring Progress

*Should Ireland measure its progress in achieving a more circular economy relative to its European Union peers? If not, what alternative benchmark should Ireland adopt and why?*

Cisco agree with the benchmarking approach relative to our European Union peers.

## Public Awareness

*Would you rate Irish public awareness of the circular economy as high, medium or low? And how important do you think raising public awareness is to further developing the circular economy?*

In general, awareness and knowledge of the term “circular economy” is low among both the business community and the citizen. In contrast, the general principles around the term ‘sustainability’ would be relatively high.

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*Recommendation – Provision of sector relevant case studies*

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**As with all new concepts, the provision of examples relevant to the business or citizen is the most effective way to bridge this knowledge gap.**

## Awareness Measures

*What are the most effective awareness raising measures that could be taken under the Strategy?*

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*Cisco Recommendation: Sectoral Design Thinking Workshops*

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Cisco would recommend that design thinking workshops be conducted for different business types helping deliver journey maps covering the essential changes pertaining to

- Circular design of the business product portfolio
- Circular operations within the business
- Business modelling for services such as product takeback and associated circular services for repair, recycle, restore etc



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- Exploration of consumption models e.g subscription services.

We would be happy to assist the Department with the running of these sessions.

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### *Cisco Recommendation: Supplier Guides*

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Cisco's supply chain is critical to our business success. A responsibly managed supply chain upholds human rights, promotes worker health and well-being, and minimizes negative environmental impacts. This work aligns with Cisco's core values and directly benefits business outcomes, including business security and continuity, worker retention, productivity, and customer satisfaction. It is also something that our stakeholders expect—whether they be customers, partners, investors, or employees.

We are also committed to moving from a linear economy, where products are used and then thrown away, to a circular economy that makes better use of our limited natural resources. We have set ambitious goals and dedicated the necessary resources to transform our business to a circular model. This transformation includes making products and packaging grounded in circular design, building our products at zero-waste factories, and running a world-class returns program. We also want to enhance customer value through product lifecycle management and make selling remanufactured equipment core to the business.

In line with these principles, Cisco has produced a 'supplier guide' ([https://www.cisco.com/c/dam/en\\_us/about/supplier/supplier-guide.pdf](https://www.cisco.com/c/dam/en_us/about/supplier/supplier-guide.pdf)) This guide helps our supply chain understand our expectations around sustainability, circularity and social fairness.

The department can create template supplier guides for different business types that can be modified as appropriate. In this way, the department can help influence behaviour change in line with policy direction.

## Stakeholder Engagement

*Are you satisfied with the proposed stakeholder engagement arrangements in the draft Strategy? Which additional stakeholders (if any), not already part of the Waste Action Group, do you think should be included in the Strategy's implementation?*

The stakeholder map appears very comprehensive. One point of note is whether the multinationals mentioned in the 'Advocacy and Awareness' section is inclusive of ICT companies. Digital technology will have a major role to play in the success of the circular economy.

For example, the national retrofit program for buildings has to date not evaluated the latest digital technologies to enhance asset efficiency (smart buildings). We are presently in discussion on this topic with the Chair of the Construction Innovation and Digital Adoption Group.

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Digital technology will play a key role in solving the reverse logistics problem for circularity of materials after their useful life. The tracking and traceability of all materials will also be aided by the inclusion of product digital passports being developed by the European Union. Cisco have engaged with numerous customers in the FMCG, fashion and construction sectors exploring the role of technology to support circularity.

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*Cisco Recommendation – Extend stakeholder working groups to include ICT representatives*

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## Green Public Procurement

*How important do you consider Green Public Procurement is in supporting the development of new circular goods and services?*

Green public procurement is the best way to influence change in how purchasing decisions are made. Within the public sector, Cisco regularly receive tender evaluation approaches that omit any criteria pertaining to green procurement. In most cases, price is the main criteria with the highest weighting for evaluation. Fit for purpose is most often the second highest weighting. When green criteria are included in the tender requirements, the weighting is typically so small as to not have a material impact on the decision process.

Deciding in what criteria to include for categories like ICT purchases is important. Typically green procurement for ICT focuses on energy efficiency primarily which is naturally a good thing. However, this looks at the operational side of the equation which primarily impacts the scope 2 emissions calculation for the entity. The supply chain for products impacts the scope 3 calculations for the entity. Scope 3 emissions calculations are very difficult to calculate for a business as they don't have governance control over their supply chain.

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*Cisco Recommendation – Low Carbon Commitments as procurement criteria*

*Green public procurement criteria should score the supplier on their commitment to setting science-based targets or their commitment to a 'Low Carbon Pledge' like the Business in the Community Low Carbon Pledge.*

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## Summary

**Cisco would like to thank the Department of the Environment, Climate & Communications for the opportunity to supply this response. We trust that our response will prove to be of value and look forward to assisting at any level requested.**

**Please contact the following people with any queries in relation to this response –**

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