
From: Kevin Maher <kevin.maher@ibec.ie>
Sent: Thursday 10 June 2021 18:02
To: circulareconomy
Cc: Elizabeth Bowen
Subject: Public Consultation on the Proposed Publication of the Circular Economy Strategy
Attachments: Circular Economy Strategy_FDI submission_June 2021.pdf; Ballygowan case study on Circular Economy.pdf

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Dear Sir/Madam,

Please see attached Food Drink Irelands response to the public consultation on the Proposed Publication of the Circular Economy Strategy.

FDI would like to nominate Britvic and their brand Ballygowan as a positive example a circular economy initiative to be included as a case study in the Strategy.

- Reuse – The Ballygowan Watercooler Division is a closed loop system – the Watercooler Drums are owned by Britvic and are reused 40+ times before being recycled. Britvic are constantly working to improve the Sustainability of their offering and last year Ballygowan became the first Watercooler business in Ireland to replace all our single use plastic cups with compostable paper cups and refillable water bottles.
- Circular Economy – the Ballygowan brand was recently relaunched and have redesigned the PET bottles to be 20% lighter and in 100% recycled plastic. This initiative removed over 1,500 Tonnes of virgin plastic from the economy annually and was delivered through a €2million investment into the Newcastlewest bottling facility as part of the Britvic journey towards being the most Sustainable water brand in Ireland.

Please see attached the pdf document with further information on the case study.

If you have any questions please do not hesitate to contact me.

Kind Regards
Kevin Maher
Environmental Sustainability Executive
Food Drink Ireland, Ibec
84/86 Lower Baggot Street
Dublin 2
D02 H720
T: +353 1 605 1787
E: kevin.maher@ibec.ie
W: www.fooddrinkireland.ie



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EU Transparency register 479468313744-50

Proposed Publication of the Circular Economy Strategy Food Drink Ireland submission

June 2021

Food Drink Ireland (FDI) is the main trade association for the food and drink industry in Ireland. It represents over 150 food, drink and non-food grocery manufacturers and suppliers. FDI is a member of the Waste Advisory Group and welcomes the opportunity to input into this consultation on the proposed publication of the Circular Economy Strategy.

The food and drink sector is committed to contributing to the creation of a circular economy and is working with suppliers, retailers and consumers to support sustainable consumption patterns. The food and drink industry recognises its responsibility for stimulating a circular economy and can play a leading role in the shift towards circularity. A collaborative approach with all actors across the supply chain will be key to the creation of a circular economy. Businesses are investing in many positive changes in their own processes and practices, some of which are highlighted in this submission. Food and drink companies will continue to improve the circularity and environmental performance of their products wherever possible, while ensuring the highest level of quality and safety.

General principles

The food and drink industry is fully committed to playing a key role in the creation of a circular economy and recognises the importance of a joined up collaborative approach across the whole value chain in order to achieve this. The food and drink industry has shown many times that it will invest in major transformation, once it is given clarity, certainty and a reasonable timeline.

Before examining the questions posed in the consultation document, there are a number of overarching priorities that should be taken into consideration in the development of a Circular Economy Strategy and any specific circular economy initiatives:

- **Coherence with Government policy:** Any circular economy initiatives must be considered as part of an overall approach. No measures arising from this process can be considered stand-alone measures; environment policy must be aligned with enterprise and health/food safety policies, and in particular the draft 2030 Agri-food Strategy.
- **Evidence base:** Any policy measures with environmental objectives must be evidence-based. Solutions must be based on robust science and transparent metrics. Behavioural change initiatives should be founded on an evidence-based assessment of the behaviour that they aim to change, as well as a clear understanding of the impact that is desired. Once in place, these factors allow initiatives to be assessed and any measures that are not achieving their stated objective should be discontinued.

- **Impact assessment:** It is also vital to fully assess the likely broader and holistic impact of any changes, including the impact on employment, SMEs, regional economic development, competitiveness and innovation.
- **Adequate transition time:** Any shock arising from government policy has the potential to disrupt supply chains and damage the viability of companies. In order for industry to adopt new procedures will require systems updates, planning and budgeting, as well as development time. Whilst business would like to be supportive of all measures, implementation time is really important in order to make changes in a positive way for consumers, and therefore help engage the public in the spirit of the ambition. There may also be an environmental impact; for example in the case of an item or material being banned, if adequate time is not given to use existing stock this could result in the forced disposal of a large volumes of material.

Consultation document questions

Food Drink Ireland will take this opportunity to make a number of points on selected questions.

1. *Do you agree with the draft Strategy's proposed key objectives? In your view, are there further or alternative objectives that should be included?*
2. **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?**

The draft document states that the Circular Economy Strategy will be updated every 18 months to two years. Given the timeframe needed to draft a new strategy, consult on the draft, finalise the strategy and then publish it, the suggested short lifespan of each strategy could lead to a disproportionate amount of time being devoted to Strategy revision rather than implementation.

The national agri-food strategy is revised every five years and Food Drink Ireland would suggest that this timeline strikes a good balance between providing an opportunity for practical progress and looking ahead to new ambitions and initiatives.

3. **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?**

An important point to consider in terms of measuring progress is whether the Irish data is directly comparable with that of other European Union member states. An issue recently arose regarding the calculation of the EU levy on unrecycled plastic packaging waste as Ireland is an outlier in how it measures this data and reports it to Eurostat. Comparisons with other EU member states should only be used to measure Ireland's progress on the circular economy if the calculation and data collection methodologies are closely aligned.

4. *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 strategy?*

5. What are the most effective awareness arising measures that could be taken under the Strategy?

A collaborative science-based approach ensuring all actors in the supply chain play a role is key in effective awareness arising measures. Citizen engagement can be difficult to achieve but it is vital that households and individuals play their part if Ireland is to transition to a circular economy. Public discourse on environmental issues has never been stronger but the challenge in the context of this consultation is to channel this into actions that will have a meaningful impact. It is important to avoid knee-jerk reactions in favour of clear messaging around science-based steps that individuals can take. For example, part of the current public discourse has been a negative narrative about plastic bottles, whereas in fact the carbon footprint of a 100% recyclable PET bottle is considerably lower than aluminium can or glass bottle. Robust science must underpin all Government communications to citizens.

One example of a successful communication and behaviour change campaign is the Gum Litter Taskforce, which is a joint initiative of the chewing gum industry, Department of the Environment, Climate and Communications, Food Drink Ireland and local authority representatives. The campaign involves extensive media activation, the 'Bin It!' school tour and a series of launch events with local authorities. Since the campaign was launched in 2007, the proportion of gum as a percentage of litter has decreased by 70%. In the most recent evaluation, 55% of people said the campaign is likely to make them stop dropping gum. More information is available on www.gumlittertaskforce.ie.

Labelling is another key pillar of citizen engagement. Many Food Drink Ireland members use the OPRL label on their packaging for the Irish and UK markets. This scheme is familiar to many food businesses and is simple for consumers to understand, especially as it is now moving towards a binary recycle/don't recycle message. This message could be even simpler and more powerful in Ireland, given that we have a national standardised list of items that can be recycled in the mixed dry recycling bin. Currently, businesses and citizens appear somewhat confused by the messaging of the MyWaste.ie campaign. On this basis, it may be more effective to encourage the use of OPRL labels in Ireland. It is worth noting that labelling changes require significant planning and resources to implement. There is a need for sufficient time to allow industry to plan and transition.

6. 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 draft Strategy indicates that all members of the Waste Advisory Group will be invited to join the Circular Economy Advisory Group. The Waste Advisory Group is already a very large stakeholder group and this consultation will likely prompt suggestions of further members that should be added.

In this context, it is vital that sub-groups are formed to focus on each of the forthcoming sectoral roadmaps. These sub-groups should fully and adequately reflect the organisations that will be expected to progress circular economy initiatives in each sector and those that will be most familiar with the regulatory and non-regulatory barriers – meaning strong private sector representation will be essential.

From Food Drink Ireland's participation in the Waste Advisory Group to date, there appears to be gaps in the representation of specific manufacturing sectors which have great scope to contribute to a more circular economy.

In addition, engagement with stakeholders through the Waste Advisory Group and the Circular Economy Advisory Group would benefit from being more structured. There should be a set frequency for meetings, with dates communicated well in advance. There should also be a structured selection/rotation of topics for consideration at meetings. An example proposed in the draft 2030 Agri-food Strategy is that each of the four pillars of that strategy would be the focus of one of the quarterly meetings of the High Level Implementation Committee. A similar approach to could be taken in the Circular Economy Advisory Group.

In cases where legislative, regulatory or significant public policy changes are being considered, full public consultation on the specific initiatives should also be carried out.

7. *What do you see as the major economy and/or social co-benefits of moving towards a more circular economy in Ireland, so that environmental improvements also provide economy and social opportunities, and vice versa?*

8. What do you see as the major regulatory barriers to the further development of the circular economy in Ireland? In answering this question please feel free to address economy-wide issues or those affecting your sector in particular.

The food and drink sectors are highly regulated, with the main food regulations and food contact materials legislation decided at EU level. Food safety is paramount, both from a regulatory point of view, from a company perspective and a national viewpoint – consumer confidence in food safety at home and in export markets is key to the continued success of Ireland's food and drink sector.

The full breath and a holistic approach of food regulation must be taken into account in any assessment of ways in which the sector can become more circular to avoid any unintended consequences. In terms of permitted food contact materials, it is not permitted to use recycled plastic in contact with food or drink unless the specific recycling process has been approved at EU level. The variety of recycled plastics that can be used for food contact is therefore limited, especially as there is currently a backlog of processes awaiting assessment by the European Food safety Authority (EFSA). The food and drink sector would support Irish government engagement with the European Commission (DG SANTE) to streamline and speed up this approval process. Otherwise, companies are concerned that the level of recycle required for them to meet their ambitions and commitments will not be available.

In other areas such as refill retail models and food donation, regulatory issues around contamination, information to consumers (including allergen information) and insurance/liability issues will all need to be addressed to reduce barriers.

9. What do you see as the major non-regulatory barriers to the further development of the circular economy in Ireland? In answering this question please feel free to address economy-wide issues or those affecting your sector in particular.

At a recent Food Drink Ireland/VOICE Ireland webinar on reusable packaging and refill retail, food and drink companies were asked what they would consider to be the biggest barrier in switching to reusable packaging. From almost 100 participants, the results were:

- Product suitability – 45%
- Cost – 22%
- Logistics – 14%
- Ensuring product quality – 11%
- Regulatory issues – 6%
- Consumer demand – 2%

The above result is an example of the types of barriers faced by industry. It will be vital for government to work with industry to address these barriers (or perceived barriers as they may be in some cases) if the transition to a circular economy is going to be accelerated. Policymakers will also be cognisant of the ongoing economic impact of Covid-19 and Brexit-related supply chain complexities on certain categories.

The development of the Irish waste management infrastructure will be a major non-regulatory barrier that will need to be addressed for the further development of the circular economy in Ireland. The food and drink industry welcomes the call in the Governments Waste Action Plan for a Circular Economy to review State support for the development of recycling infrastructure and to work with the waste sector to encourage investment to allow for the collection and separation of soft plastics and black plastics, two materials currently considered non-recyclable.

These type of materials are difficult to move away from for a variety of reasons, the challenge relating to each item must be assessed individually. Where gaps in infrastructure exist, government must assess what role it could play in developing or supporting the development of the appropriate infrastructure to allow the material to be recycled.

Some examples include:

- **Flexible plastic/film** – these materials cannot currently be recycled in Ireland. Processors have indicated that if industry converged on one type of film, it would become viable to collect and recycle that material. In the UK, WRAP has indicated PE as the favoured material and companies are responding. If this step was taken in Ireland, in conjunction with the waste processing industry, it would prevent this material from ending up in landfill and could create supplies of recycled content for inclusion into future packaging.
- **Black plastics** – these materials have attracted negative publicity in Ireland for being non-recyclable. In fact, they are recyclable but the issue is that the current hardware on sorting lines cannot detect them, which is an entirely different challenge. Waste processors should be supported to invest in new technology which would facilitate the detection of black plastics, allowing them to be recycled.

- **Compostables** – Currently compostable cups and food containers do not provide a total sustainable solution. This is not because of the cups/containers themselves but rather the lack of adequate infrastructure for the processing them. Compostables are recyclable but are not currently recycled due to a lack of infrastructure. Due to the on-the-go nature of the products, consideration must be given to appropriate on-street and household collection, whether separate collection or combined with food waste.
- **Tetra Pak** – This type of packaging is popular with consumers and is possible to recycle, where carton recycling facilities are available.

The food and drink industry continue to be significantly impacted by the ongoing Covid-19 crisis and the suppression of economic activity as a result of necessary public health restrictions. Post-Brexit supply chain complexities combine as significant challenges. In this climate, policymakers will understand that our capacity for investment is significantly reduced.

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

The food and drink industry recognise that Green Public Procurement will play an important role in developing new circular goods and services. Setting criteria for sustainable food procurement for hospitals, prisons, schools etc. to promote balanced and sustainable diets will help support the development of new circular goods and services.

11. What would be the most effective action Government could take to promote/support and incentivise the further development of the circular economy?

Research and innovation are the key to finding solutions to make the food and drink industry, and our economy as a whole, more circular. Government is well placed to support increased levels of research, development and innovation, both commercial and pre-commercial. DECC should work with the Department of Finance, Department of Enterprise and others to provide the necessary R&D support required to help manufacturers to research, identify and scale up circular design and circular manufacturing initiatives.

The R&D Tax Credit should be reviewed with this in mind and also take account of the incremental nature of innovation in the sector. Research funding and innovation supports from across government and from the EU should also be leveraged.

From a food and drink perspective, the Prepared Consumer Foods (PCF) Centre, was opened in 2018 to support companies in piloting industry-led collaborative research and innovation capability, to maximise value creation opportunities and address the challenges across the industry. It is funded by the Department of Agriculture, Food and the Marine. It contains an Advanced Packaging Suite where companies can pilot new packaging types. It also has a Shelf-life Suite where companies can develop and test products with a view to reducing levels of food waste. It is intended to build up the capacity of the PCF Centre for innovation relating to the bioeconomy and use of by-products in the future.

Specifically on food waste, the need for legislation similar to the Good Samaritan Act has been recognised in the Waste Action Plan for a Circular Economy. This should be prioritised to support the development of reuse and donation models.

12. Which sectors do you think can make the biggest contribution to making Ireland's economy more circular?

Agrifood is one of the sectors identified for the development of a sectoral circular economy roadmap.

➤ Food losses and food waste

A number of the preliminary agrifood actions flagged in Annex 3 focus on food losses and food waste. Food Drink Ireland members have many examples of company-level initiatives to reduce food waste in line with the food waste hierarchy:

- Rigorous supply chain management aimed at reducing surplus stock.
- Clear 'use by' and 'best before' date markings on products to reduce food waste in the home.
- Redistribution of surplus food and drinks nearing the end of their shelf-life, for example by working with FoodCloud, a social enterprise that connects businesses with surplus food to charities. Strict standards must be met for donations to ensure the highest levels of food safety. Some companies give financial and other supports to FoodCloud in addition to donations.
- Processing of food waste that is not edible or desired by humans into pet food.
 - In a meat factory, this provides a solution for by-products such as offal or blood.
 - The growing Irish whiskey industry contributes the vast majority of spent grains and pot ale from the distilling and brewing processes for use as animal feed.
- The growing Irish whiskey industry contributes the vast majority of spent grains and pot ale from the distilling and brewing processes for use as animal feed.
- Converting food waste into bioenergy through anaerobic digestion. There are only a handful of anaerobic digesters in Ireland, compared with about 60 in Northern Ireland, so this is an area with significant growth potential. As the digesters tend to be farm-based, they can also serve to aid on-farm diversification in an environmentally sustainable way. In Germany and Austria, encouraged by favourable government renewable energy policies, there are several thousand on-farm digesters treating mixtures of manure, energy crops and restaurant waste, with the biogas used to produce electricity.

Central to continuous progress in reducing food waste is the adoption of a robust measurement methodology. Some companies are already using the Champions 12.3 methodology (champions123.org), which has been developed at international level, along with guidance and reporting templates from WRAP ('Target, Measure, Act' approach). This allows progress to be tracked over time on a like-for-like basis. Given the complexities of detailed food waste reporting, Food Drink Ireland would suggest adopting an existing, respected framework that companies may already be familiar with through their UK or other operations.

The Environmental Protection Agency has already begun working intensively with the retail sector on a collaborative basis to reduce retail food waste. This tailored, consultative approach should be rolled out to other parts of the food chain, in order of priority according to the proportion

of food waste generated. Food Drink Ireland would be open to engaging with the EPA due course in relation to the food and drink industry.

The lack of knowledge of date marking on food labels has been identified as a key driver in food waste at consumer level. Up to 10% of the food waste generated in the EU is attributed to date marking, according to a European Commission study in 2018. In order to address the confusion over date labels on food at consumer level there needs to be a concerted effort to educate and inform consumers on date labels to empower them in making informed choices and prevent unnecessary food waste.

There is also an opportunity to make better use of smart technology within the food sector. Some emerging smart technology within food packaging can indicate to consumers when to dispose of the food for food safety reasons.

➤ Packaging

Food waste and packaging are closely linked and cannot be considered in isolation. Packaging is essential to bring many food and beverages to our tables. It has a number of important functions, one of the most important being to reduce food waste. Because of effective packaging processes, food wastage rates (pre-consumption) are 2-4% in industrialised countries. This compares with 50% in developing countries.

Zero Waste Scotland has published a report clearly stating that food waste is now a greater contributor to the global climate crisis than plastics. Two comparisons are vital to bear in mind when discussing food packaging:

- The environmental impact of avoidable household food waste is eight times greater than the impact of total packaging waste going to landfill.
- Ten to fifteen times more energy and materials are locked up in household goods/food than in the packaging around them.

For this reason, no measures taken to reduce packaging should increase food waste.

Food and beverage packaging plays a key role in protecting, containing and preserving the produce contained within. Modern packaging is a central element in the efficient manufacturing, handling and distribution of food from the factory to the consumer's kitchen. Consumer safety is the overriding objective of food and beverage producers and packaging ensures effective communication to consumers and its safe use and handling. Packaging ensures that people can buy and use products when they want them, in good condition and with little wastage. Food packaging also lets consumers see the nutritional information on the label to help make informed choices.

The DRS is in the latter stages of its development and the establishment of the DRS should be recognised in the strategy to ensure that materials (and their entire component parts) within scope are excluded from existing or future EPR regulations.

Companies recognise the need to minimise the impact of their packaging on the environment. Food Drink Ireland members have many examples of company-level initiatives to achieve this goal:

- Phasing out certain difficult-to-recycle materials, for example PVC and EPS.
- Working towards reducing the use of complex packaging combinations and move toward simpler, single material, circular packaging formats and materials.

- Developing packaging that encourages re-use or better recycling rates (for example PE and PET)
- Setting targets and deadlines to meet ambitious packaging milestones.
- Creating and guaranteeing a future market for food grade recycled content

Significant investment has been, and will continue to be, made by companies in these initiatives such as Ireland's combined beverage industry in its preparations for the introduction of a well-designed DRS. Government policy should recognise and support this objective in a number of ways:

- Support the creation of more closed-loop recycling processes, especially those creating food grade recycled content.
- Consider the likely trajectory of prices for recycled content as demand increases for a constrained supply of material, especially in the lead up to key EU and other deadlines. Provide supports or a phased timeline to level out spikes in prices of recycled content.
- Encourage a harmonised, science-based approach within Ireland and across the EU. Own initiatives from retailers, could be counterproductive if different retailers have diverging requirements. This would pose a dilemma for FDI member companies that supply multiple retailers. It is important to maintain an international perspective also, as supply chains for both food and drink products and for packaging often go beyond Ireland.

13. Do you broadly agree with the policy areas listed for future development in the draft Strategy? If not, which areas would you remove/add to the list?

14. Any other comments?

The prospect of additional environmental levies has been raised again in the draft Circular Economy Strategy. Food Drink Ireland understands that an additional, focused public consultation will be carried out on this topic, which is a welcome approach.

In relation to beverage cups, the prevalence of reusable cups will continue to grow but they are unlikely to become a ubiquitous solution in the short to medium term.

In this context, it is important to recognise that the other three types of cups (compostable, recyclable and non-recyclable) are not equal from an environmental point of view. Ignoring this fact misses an opportunity to support the industry to become more sustainable and provide a critical mass of a specific type of cup for waste management operators to process.

For this reason, Food Drink Ireland does not agree with the proposal of a flat levy on all disposable cups. Non-recyclable cups should be the main target of any levy.

Compostable and recyclable cups can be part of a sustainable solution. They are in line with the objectives of the circular economy. A potential levy provides government with an opportunity to steer producers to switch from less sustainable materials to more positive materials. Sending a clear signal, by exempting either or both of compostable and recyclable cups from the levy, provides an incentive for the industry to move to an agreed, more sustainable model and allow

retailers to support investment in end-of-life solutions instead of potentially losing revenue through having to apply a levy and alienating customers.

Adapting to a levy will take some time. Any new levy should be set out in detail at least 12-18 months before its entry into force to allow businesses to use up existing stocks and establish new supply chains where needed. Contract periods with suppliers can last 12 months and if many companies are looking to change their cups simultaneously this will put additional pressure on the small number of cup suppliers in the market.

In parallel with these developments, consumer education programmes should be rolled out, with funding from the Environmental Fund. These should inform consumers and raise awareness about the appropriate segregation and disposal of waste, including zero-littering.

Conclusion

Food Drink Ireland is keen to work with DECC, as well as other departments and agencies, to accelerate the transition to a circular economy and develop solutions to the challenges for businesses.

For further information in relation to any of the points raised in this submission, please contact Kevin Maher, Environmental Sustainability Executive, Food Drink Ireland on kevin.maher@ibec.ie.

Ballygowan case study on Circular Economy

€2m investment in Newcastle West underpins Ballygowan's move to target 100% sustainability

- €2m investment in new packaging process at home of Ballygowan
- Ireland's iconic water brand becoming Ireland's most sustainable water brand
- Over 1,500 tonnes of virgin plastic PET bottles to be eliminated annually
- New Ballygowan branding reflects the sustainable focus of the new packaging

Ireland's own Iconic Water Brand, Ballygowan, has moved its full range of grocery products to RPet, fully recycled and recyclable bottles. The move to new RPet bottles has been facilitated by a €2m investment in their operations at Newcastle West, the home and source of Ballygowan. The move is part of a drive for 100% sustainability across the business, under Britvic Ireland's Healthier People, Healthier Planet strategy.

The shift to recycled bottles will remove 51million virgin plastic bottles from circulation annually. The shift to recycled bottles will reduce Ballygowan's virgin plastic consumption by 1,288 tonnes. Shifting to lighter bottles will reduce plastic use by a further 245 tonnes. Overall, there will be a reduction of 1,533 Tonnes of virgin plastic each year.

Ballygowan is a 100% natural mineral water. Rainfall drifting in from the Atlantic Ocean falls on land close to Newcastle West, Co. Limerick. It is filtered through mineral rich limestone over centuries and then it returns to the surface from a well, where it is bottled and enjoyed all over Ireland.

Britvic Ireland is are committing to reducing direct carbon emissions by 50% by 2025 and indirect carbon emission by 36% by 2025. Ballygowan is taking a lead within that ambition, having reduced its direct carbon emissions by over 90%.

Ballygowan's home at Newcastle West, now operates on 95% renewable energy and 100% renewable electricity. That is the highest level of renewables use by any Britvic factory worldwide. There are plans to further increase this in the years ahead. The facility at Newcastle West has also achieved zero waste-to-landfill.

Ballygowan offers Irish consumers the opportunity to buy a locally produced brand, bottled at source in Ireland. Not only does this support Irish jobs, it also reduces the environmental impact of transporting bottles of other water brands from factories across Europe.

For further information, please contact:

Joe Heron or Joanne O'Sullivan, Murray

087 6909735 / 086 0527999

Email: jheron@murraygroup.ie / josullivan@murraygroup.ie