

**Date:** 25<sup>th</sup> March, 2021

**To:** Duncan Everett, CEO, *Noble Foods*

**From:** *Charles Watson, Chairman, River Action*  
*The Advisory Board, River Action*

**Subject:** *Noble Foods and the Environmental degradation of the Wye Valley Catchment*

Dear Mr Everett

Many thanks for your letter of 15<sup>th</sup> March, which we read with great interest.

We welcome the news that Noble Foods is starting to take action to consider how it addresses the major issue of nutrient run-off from its own Intensive Poultry Units (IPUs) and those of its third-party suppliers.

In particular, we are pleased to hear that you are now working closely with the Wye and Usk Foundation (WUF) and have started to conduct site visits to gain *“a greater insight and understanding of the issues faced on farms dealing with, soil health, nutrient, and water management”*, after which you will develop *“mitigation techniques and controls”* to deal with the environmental impacts of the intensive poultry industry.

We look forward to receiving an update on the detail of these planned activities and interventions once these site surveys have been completed and request that you publish a summary of the findings of your site visits and the details of your plan to address the nutrient issue, given that this is clearly a matter of huge public interest in the Wye catchment and nationally.

Notwithstanding these proposed actions, we were most surprised (as your letter implies) that Noble Foods does not already have the requisite data on such critical issues as nutrient and water management across your supply chain. The fact that you are having to undertake this basic environmental work now indicates that you have not previously conducted any baseline analysis of the environmental standards adhered to across your own IPUs and those of your third-party suppliers. Likewise, the fact that you will be *“investigating specific areas to improve nutrient management such as...manure handling, range and water management”* appears to lead to the conclusion that an intensive agricultural business such as Noble Foods is currently operating without sufficient nutrient and water management systems in place. Given the proximity of many of Noble Foods' operations to the River Wye Special Area of Conservation (SAC) this is of huge concern.

Your letter of 15<sup>th</sup> March notes that *“Protection of the environment is an agricultural imperative and isn't just limited to poultry farms”*. With respect, that is stating the obvious. Every farm and agricultural producer in the country naturally has a duty of care to protect the environment. However, it is not a matter of collective responsibility, as your letter implies. Given the huge financial returns Noble Foods has made over the years from the egg industry, it is particularly important that major agri-businesses such as yourselves lead the way in cleaning up the industry. You also state that the issues that River Action has raised are part of a *“a wide and complex issue”*. Respectfully, they are not. The issue here is simple: millions of chickens appear to have been put out onto the Wye Valley catchment without

due regard to the resultant massive nutrient run-off into the river system, thus contributing significantly to the severe and escalating environmental degradation of the Wye and its tributaries.

If your company and your brands are to continue to command the trust of your many stakeholders, Noble Foods needs to take unilateral action immediately to address what is clearly a major environmental issue. You do not have to reinvent the wheel in order to achieve this. There are internationally recognised standards of best practice for dealing with these issues of nutrient and water management. For example, those published by The Alliance for Water Stewardship [www.a4ws.org](http://www.a4ws.org) have been adopted successfully by intensive poultry producers in various parts of the world – enabling successful businesses to thrive sustainably whilst safeguarding nature.

Accordingly, we ask you to:

1. Provide a time commitment as to when the site visits you refer to will be completed
2. Publish the report of these findings – comprising a candid assessment of the issues that these visits have identified
3. Commit publicly to a nutrient mitigation plan for your own IPU sites, with a timetable of implementation that demonstrates real urgency in implementing these solutions
4. Commit to investing an appropriate and (disclosed) level of capital expenditure, together with a timescale for its deployment, to implement these measures
5. Publish an environmental code of standards which your third-party producers must adhere to in order to be contracted as a Noble Foods supplier
6. Publish a credible environmental policy statement on your website which encompasses the above (for your information the link to your current environmental “Full Report” as publicised on your website is still not downloading. It is now almost six months since we first attempted to access this important document). <https://www.noblefoods.co.uk/wp-content/uploads/2020/09/Noble-Foods-CSR-2020.pdf>

We Look forward to hearing your response

Yours sincerely

Charles Watson - **Chairman**

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