

**Date:** 15<sup>th</sup> February 2020

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

**From:** *Charles Watson, Chairman, River Action*

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

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Dear Mr Everett,

I am writing to you in my capacity as the Chairman of River Action, a recently created group which seeks to engage with major agricultural suppliers and producers regarding the environmental standards of their supply chains. River Action is an independent organisation with no formal affiliation to any other body (either local or national) and it is our intention to work across the UK to highlight and seek remedy where there is evidence of environmental malpractice negatively impacting river ecosystems.

Specifically, I am writing about the current situation in the catchment area of the River Wye where poultry farming has been widely reported to be the cause of severe agricultural pollution of the river system. As one of the UK's leading egg producers, with extensive production units in this region, we wish to ask some critical questions regarding Noble Foods' environmental policies and the actions that you are taking to address the ecological impact of the egg production industry.

### **The crisis facing the Wye catchment area**

It cannot have escaped your attention that, from an ecological perspective, the UK's rivers are in crisis.<sup>1</sup> **The Environment Agency** recently reported that "*all of the rivers, lakes and streams in England are polluted*"<sup>2</sup> - and in the summer of 2020, it was the deterioration of the **River Wye** in particular that made headlines. Commentary in media such as **the Times**,<sup>3</sup> **the Guardian**,<sup>4</sup> **the BBC**<sup>5</sup> and **Countryfile**<sup>6</sup> reported on the river's severe decline in ecological and chemical health, with one report describing it as a "*wildlife death trap*".<sup>7</sup> A recent report by **Natural Resources Wales (NRW)** disclosed data that shows over 60% of the Wye is facing an ecological crisis.<sup>8</sup> There are also a number of surveys and reports by environmental groups and charities in the public domain that have been monitoring the decline of the river closely. These unanimously confirm that in recent years algal blooms are multiplying in number.<sup>9</sup> Reports evidence that the blooms are lasting longer and occurring further upstream. It is widely believed that unless immediate and meaningful remedial action is taken, the Wye ecosystem will suffer irreversible ecological damage. The **Wales Environment Link (WEL)** has said "*the river is rapidly reaching the point where wildlife that relies on the Wye ecosystem may be permanently affected*".

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<sup>1</sup> <https://www.riverstrust.org/2020/09/18/new-ea-water-quality-statistics-show-failure-at-a-national-scale/>

<sup>2</sup> <https://www.bbc.co.uk/news/science-environment-54195182#:~:text=All%20of%20the%20rivers%2C%20lakes,%2C%20farming%2C%20and%20industrial%20chemicals>

<sup>3</sup> <https://www.thetimes.co.uk/article/free-range-egg-farms-choking-life-out-of-the-wye-rt3c763qc>

<sup>4</sup> <https://www.theguardian.com/environment/2020/jun/20/its-like-pea-soup-poultry-farms-turn-wye-into-wildlife-death-trap>

<sup>5</sup> <https://www.bbc.co.uk/news/uk-wales-54181261>

<sup>6</sup> <https://www.countryfile.com/news/river-wye-pollution-linked-to-free-range-poultry-farming/>

<sup>7</sup> <https://www.theguardian.com/environment/2020/jun/20/its-like-pea-soup-poultry-farms-turn-wye-into-wildlife-death-trap>

<sup>8</sup> <https://www.bbc.co.uk/news/uk-wales-55345302>

<sup>9</sup> <https://www.wyeuskfoundation.org/news/nations-favourite-river-facing-ecological-disaster>

Agricultural practices, in particular those of the egg production industry, are reported to be a major contributor to the continued deterioration of our rivers – and the River Wye in particular.

### **The environmental impact of the poultry industry**

Recent media coverage of the River Wye’s decline documented the impact of poultry farms on the increase in algal blooms. The articles referred to above reflect a growing body of evidence that attributes the river’s ecological deterioration to the unprecedented and disproportionate growth in poultry farms around the headwaters of the Wye.

According to the calculations of the **Campaign to Protect Rural England (CPRE), Shropshire**, as of July 2020, in the counties of Shropshire, Herefordshire and Powys there are 500 farms with a total of 1,420 intensive poultry units/sheds, containing over 44 million birds.<sup>10</sup> In a public statement, **WEL** writes that sites producing 6,000,000 birds have been approved in the Wye catchment in the past five years alone.<sup>11</sup> It is reported that this has led to a two-fold increase of phosphate levels in the lower Wye in the past six years,<sup>12</sup> causing the river to now exceed permitted levels of phosphate under the **European Union (EU) Habitats Directive**. In 2020, environmental groups and communities were so concerned by the growth of poultry farms and the resultant impact on the River Wye, that a coalition of groups publicly called for a moratorium on planning approval for new intensive poultry farms.<sup>13</sup>

In terms of the specific impact of these nutrient run-offs, **The Guardian** reported last summer that *“Chicken excrement rich in phosphates and other chemicals gets spread on the ground around sheds and is being flushed into the river, causing deadly algal blooms to spread. And the problem is becoming increasingly severe as more and more free-range poultry farms are built near the 134-mile-long river. River plants such as ranunculus are being suffocated, oxygen is taken from the water, and the river’s brown trout, chubb and barbel are dying off...”*<sup>14</sup> **The Campaign for the Protection of Rural Wales (CPRW)** has also stated publicly its concern about the impact on the Powys landscape of large poultry units.<sup>15</sup>

A **NRW** report published in December 2020 provides a comparison of phosphorus concentrations in the Wye against targets and indicates widespread failures, some of them large in magnitude. 14 water bodies passed their targets, 28 failed and three were unknown.

While linking individual instances of agricultural pollution to individual farm units is often difficult to do, the overwhelming evidence points to poultry farming being responsible for this situation to a significant degree.

### **Critical Questions for Noble Foods**

At a time when environmental agencies and local councils sadly appear to lack the resources to effectively monitor this problem or enforce regulation adequately,<sup>16</sup> we believe that Noble Foods

<sup>10</sup> <https://www.cpreshropshire.org.uk/poultry-farms>

<sup>11</sup> [https://www.waleslink.org/sites/default/files/wel\\_statement\\_on\\_nrw\\_phosphate\\_in\\_river\\_wye\\_sac\\_final.pdf](https://www.waleslink.org/sites/default/files/wel_statement_on_nrw_phosphate_in_river_wye_sac_final.pdf)

<sup>12</sup> <https://www.brecon-radnor.co.uk/article.cfm?id=112425&headline=The%20nation%E2%80%99s%20E2%80%98favourite%E2%80%99%20river%20is%20facing%20ecological%20disaster&sectionIs=news&searchyear=2020&cat=Environment>

<sup>13</sup> <https://www.theguardian.com/environment/2020/oct/05/river-pollution-leads-to-welsh-demand-for-halt-to-intensive-poultry-units>

<sup>14</sup> <https://www.theguardian.com/environment/2020/jun/20/its-like-pea-soup-poultry-farms-turn-wye-into-wildlife-death-trap>

<sup>15</sup> <https://www.bbc.co.uk/news/uk-wales-53430926>

<sup>16</sup> <https://www.telegraph.co.uk/news/2019/11/16/pollution-tests-rivers-have-nearly-halved-past-five-years/>

needs to answer directly some critical questions relating to the continued and tragic degradation of one of Britain's most iconic rivers:

1. *As summarised above, there appears to be compelling evidence that the agricultural practices of the egg production industry are playing a major role in the environmental degradation of the Wye river and its catchment, with many of the region's egg farms appearing to have inadequate mitigation methods to prevent the run-off of highly phosphate-rich chicken excrement into the river catchment. **As one of the largest egg producers in the Wye catchment, please can you provide details of the mitigation processes that Noble Foods has implemented on your owned egg production sites to prevent these highly damaging nutrient runs-offs?***
2. *Please can you also share with us **details of the environmental standards to prevent nutrient run-offs within your procurement policies that you insist third party egg producers in your supply chain must adhere to?***
3. *Noble Foods is a highly profitable and successful business with reported annual revenues in excess of £300 million. Your majority owners, the Dean family, are also documented to have accumulated over recent years substantial personal wealth largely from egg production. It has also been reported in the business press that Noble Foods could soon receive a substantial capital sum in respect of the intended sale of Gü Puds. **Please can you detail how these abundant financial resources are being used to implement the necessary mitigation processes to prevent nutrient run-offs both on your own egg farms and your third-party suppliers? Specifically, please can you quantify the amount of money Noble Foods has invested in run-off mitigation measures over the last 12 months and what capital expenditure you have allocated going forward?***
4. *We note with interest in a recent public statement that you confirmed that you were working with the local Rivers Trust, the Wye & Usk Foundation, to mitigate the environmental harm being done by egg production. This is clearly much welcomed news given the scale of the environmental issues facing the industry's production processes and the urgent need for remedy. **Please could you provide further details of what this work comprises, what the likely outputs are and when they will be implemented?***
5. *We are aware that Noble Foods is supplying eggs to the majority of the UK's major supermarkets. Given the high standards of environmental compliance and supply chain integrity now expected by all of the UK's major food retailers, **do you not believe that supplying them eggs from an area where poultry farming is linked to environmental degradation is directly in contravention of the environmental standards expected by your major customers?***
6. *Noble Foods' website displays prominently the statement that "you strive for sustainability in all that you do". **Please can you give evidence of the policies and practices implemented to support this claim in the context that Noble Foods is one of the largest operators in an industry which, based on the evidence presented above, is responsible for severe environmental degradation?***
7. *You would appear to have posted recently on the Noble Foods website a film announcing your "Environmental Sustainability Programme". In this film you pledge to "reduce the impact of your operations on the environment" and to "improve the biodiversity of all your operational*

*facilities". Among the various initiatives you describe to achieve these goals (which include laudable intentions such as: installing solar energy; using electric-powered transport; cycling to work; turning off the lights & taps; etc) **there is no mention of addressing what is arguably the most significant environmental issue facing your business – namely the ecological damage done by the nutrient run-off of chicken excrement into river systems. What is the justification for this very significant omission?***

- 8. Your website encourages the downloading of Noble Foods's Environmental Report. During the last four months we attempted to download this report on many occasions. However, on each such attempt the link would not open. We have also made direct requests to Noble Foods to be sent a copy of this report – which have gone unanswered. Notwithstanding the fact that it seems extraordinary that one of the UK's major food production companies has been displaying for a period of time an Environmental Report on its website that cannot be opened or downloaded, **please can you supply a copy of this document with immediate effect?***

We look forward to hearing your response to the above questions as soon as possible and would welcome thereafter the opportunity to engage in constructive discussion around the issues raised in this letter.

For your information we are working collaboratively with a wide body of other environmental organisations and prominent individuals who are active in campaigning for cleaner rivers. A number of the above, in their capacity as members of the River Action Advisory Board, are co-signatories of this letter.

Yours Sincerely,

**Charles Watson**  
**Chairman, River Action**  
Charles@riveractionuk.com

**Richard Benyon**

**Ben Goldsmith**

**George Monbiot**

**Feargal Sharkey**

**Isabella Gornall**

**James Macpherson**

**James Wallace**