

To: Duncan Everett, CEO, *Noble Foods*

From: Charles Watson, Chairman, River Action

SUBJECT: Noble Foods sustainability priorities

Dear Mr Everett

I am writing further to my letter of 25th March, to which I am still awaiting a response, and in light of the recent 'Poultry Partner Spotlight' in which Noble's Agriculture Director Graham Atkinson participated at the Alltech One Ideas conference.

Notwithstanding the fact that it is concerning to find such an established company as Noble Foods at such an early stage of defining its sustainability strategy, we are most concerned at reports that river pollution and the mitigation of nutrient run-off did not feature amongst the four key focus areas of Noble Foods' sustainability goals - as defined by Mr Atkinson.

As I'm sure you are aware, every single river in England is now polluted beyond legal limits with vast and serious implications for our wildlife and human health. Agricultural pollution is implicated in the pollution of 45% of these waterways. It is therefore quite simply beyond belief that one of the UK's largest food producers would not perceive this as even one of the top four sustainability issues relating to its owned agricultural units and those of its third party supply chains.

On the River Wye specifically, phosphate levels have doubled in the past six years alone to the extent that the river has recently been described as a "wildlife death trap" which is reaching a point of no return. The primary cause of this destruction is now widely accepted to be nutrient-rich run-off of chicken excrement from intensive poultry units. As the the largest operator (by a wide margin) of egg-producing IPUs in the Wye catchment, Noble must take primary responsibility and demonstrate leadership by publishing as a matter of urgency a nutrient management plan to mitigate phosphate run off from your IPUs. There is perhaps no worse conceivable start to a corporate sustainability journey than being responsible for the decimation of one of our most iconic rivers - without any apparent care or regard.

I look forward to your comments on the above, and to receiving your response to the requests set out in River Action's letter of 25th March, which I have included again below for your information.

1. Provide a time commitment as to when the site visits you referred to in your letter of 15th March will be completed.
2. Provide a candid assessment of the issues that these visits have identified.
3. Commit publicly to a nutrient mitigation plan for your own IPUs, 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.

In keeping with Mr Atkinson's recognition that collaboration and consultation are key aspects of devising a sustainability strategy, I would be more than happy to discuss this topic at a time of your convenience and to make available to you any information which may be of use in devising a plan to address the river pollution crisis.

Yours sincerely,

Charles Watson