

**Date:** 17 September 2021

**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 over six months on from my first letter on behalf of campaign group River Action in February 2021, which requested answers as to what action Noble Foods is taking to mitigate the impact of agricultural pollution from your owned and supplier Intensive Poultry Units in the River Wye catchment.

We noted your response on the 15<sup>th</sup> of March that stated that Noble Foods is starting to take action to consider how it addresses the major issue of nutrient run-off and that you are working closely with the Wye and Usk Foundation to address the issue. However, since then your silence has been deafening and we were particularly disappointed not to receive any response to our follow-up letter of 23<sup>rd</sup> March requesting further information on specific and tangible actions Noble Foods is taking to mitigate the environmental impacts of intensive egg production.

In the meantime, compelling evidence is building that the ecological crisis facing the River Wye and its wider catchment has worsened significantly. [Citizen science reports](#) from up and down the river are showing consistently that phosphate levels are substantially above the national permitted limits. Meanwhile the return this summer of severe algal blooms along the length of the river and the widespread absence of Ranunculus river weed and the visible wider depletion of the wildlife of the river are tragically indicating the imminence of an environmental catastrophe.

We also have every reason to believe that further citizen science phosphate monitoring exercises that are currently taking place directly above and below the outflows from the many Intensive Poultry Units along the catchment will soon provide specific evidence of the environmental damage being inflicted by your business on the river system. We are also aware that many of your IPUs have open drains surrounding your chicken sheds that run directly into water courses, with minimal pollution mitigation. Indeed, your own promotional Happy Egg YouTube videos show the close proximity of your chicken ranges to watercourses.

Anybody living in or visiting the Wye Valley this summer could not fail to have been aware of the huge and growing public concern that is mounting around the unfolding pollution-caused ecological disaster facing the river.

In that context, it is deeply concerning not to have received any further detail on actions being taken by Noble Foods, the largest egg producer in the Wye Valley, to address its role in the river pollution crisis. It is also equally concerning that addressing the adverse environmental impact of your business on local rivers is still not listed as a priority or even mentioned in your Corporate Sustainability Report - or in any of the public statements made recently by senior Noble Foods management around environmental and sustainability issues. The fact that you are failing to even acknowledge what is now

the biggest environmental issue facing your business can only raise major questions over the very integrity of Noble Foods' environmental and sustainability claims.

As we have not yet received any update on progress you have made to tackle the aforementioned issues, we now intend to contact directly the UK supermarket retailers that supply Happy Eggs and own brand eggs produced by Noble Foods, to highlight the impact that this egg production is having on river ecosystems, including on the [public's favourite river](#). We believe it is now an issue of public interest that the consumers of your products should be made aware of their adverse environmental impact.

River Action has made its best efforts to conduct a constructive debate with Noble Foods on this critical issue – and for reference I repeat once again below the critical unanswered questions we asked you in our letter of 23<sup>rd</sup> of March.

- 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.**

Answers to these questions are still needed as a matter of urgency.

It is still not too late for Noble Foods, as the UK market leader, to demonstrate immediate and unilateral leadership in addressing the pollution issues caused by egg production.

Noble Foods has more than adequate financial resources to reinvest in mitigating the environmental damage that it has done to the very land that has created such substantial wealth for its shareholders over recent years.

Yours sincerely,

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**James Wallace**  
**Lord Randall**  
**George Monbiot**  
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