

**Date:** 17 September 2021

**To:** Andy Dawkins, CEO, *Avara Foods*

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

**Subject:** *Avara Foods and the environmental degradation of the River Wye Catchment*

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Dear Mr Dawkins,

I am writing regarding the escalating river pollution crisis on the River Wye to ask what action Avara Foods, as one of the leading agri-businesses in this catchment, is taking to prevent nutrient run-off from its local supply chain.

This letter is drafted in my capacity as the Chairman of River Action, an environmental group which seeks to engage with major agricultural suppliers and producers regarding the environmental standards of their supply chains. River Action is a UK registered charity with no formal affiliation to any other body (either local or national) and we work across the UK to highlight and seek remedy where there is evidence of agricultural practices negatively impacting river ecosystems.

Specifically, the context of my letter relates to the current situation in the catchment of the River Wye where nutrient run-off from the intensive poultry industry is now acknowledged widely as a major cause of the severe pollution of the river system. As the UK's leading producer of chicken meat, with a continuously expanding major production facility in Hereford which sources annually tens of millions of chickens from across the Wye river catchment, we wish to ask some critical questions regarding Avara's environmental policies and the actions that you are taking to address the adverse ecological impact of your business.

### **The crisis facing the Wye**

It cannot have escaped your attention that the UK's rivers are in severe ecological crisis, with [every single river](#) in England now polluted beyond its legal limits.

Of all the UK's rivers, the **Wye** has repeatedly made more headlines than any other with regard to the existential pollution crisis it is facing. In recent months the severe damage being done to the river's ecology by the increasing frequency of nutrient-fed algal blooms have been documented extensively [in the media](#) and across social media. The recent documentary [Riverside](#) provides a comprehensive account of the decline of this iconic British river.

It can be no coincidence that the river's recent [rapid ecological deterioration](#) correlates with the unprecedented and disproportionate growth of the intensive poultry industry across the Wye Catchment. There are now believed to be [well over 20 million chickens](#) being reared at any one time in the catchment. A significant proportion of these are sourcing Avara's Foods' processing business – which according to your own published materials consumes 4.5 million chickens a week.

Water quality monitoring being conducted by environmental groups and NGOs (e.g. [Friends of the Upper Wye](#), the [Wye Salmon Association](#) and [Friends of the Lugg](#)) up and down the river and its tributaries is documenting massively excessive phosphate levels across the river system. There can be no question that, as a result of industrialised intensive farming practices, the soil of the Wye catchment is now totally saturated with phosphates. However, huge agri-businesses, such as Avara Foods, appear to continue to dispose of hundreds of thousands of tons of chicken manure each year by spreading it across the land, from where the nutrients therein will inevitably run off into the region's many watercourses.

This excerpt from a recent [article](#) in the Guardian summarises the situation succinctly: *“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 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...”*

It is widely believed that unless immediate and meaningful remedial action is taken, the Wye ecosystem will suffer irreversible damage – and this iconic British river will simply die.

### **Critical Questions for Avara Foods**

In the context of this rapidly deteriorating situation, we would like Avara Foods to answer directly some critical questions regarding your environmental practices and policies:

- 1. *As the largest poultry meat producer in the region, please can you provide details of the mitigation processes that Avara Foods is implementing to remove from the River Wye catchment the huge quantities of phosphate-rich chicken manure that your supply chain produces each year?***
- 2. *Your [supplier code of conduct](#) states that 'we expect our suppliers to comply with all applicable environmental regulations and work consistently to minimise their environmental footprint and prevent pollution..... Suppliers must be working towards minimising pollution to air, water and soil'. As this does not currently appear to be the case in the Wye catchment, please could you provide further details about the specific***

*nutrient management standards that you require third-party suppliers of chickens within your supply chain to adhere to?*

- 3. Avara Foods is a highly profitable and successful business with reported annual revenues in excess of £1.2 billion. With regard to your two major shareholders, Cargill is a multi-billion dollar multinational corporation and the Faccenda family are reported to have accumulated substantial personal wealth from chicken farming over many years. Please can you provide details of the specific capital expenditure being allocated from these available abundant financial resources to implement the necessary mitigation processes to remove phosphates from the river catchment?*
- 4. Avara Foods announced earlier this year a further £6.5m expansion of its Hereford chicken processing plant, – which is a major driver of local planning applications to build more intensive poultry units to supply your ever-increasing demand for broiler chickens. Please can you provide specific details of the corresponding nutrient run-off mitigation plans you are implementing to protect the local environment from this latest chapter of the exponential growth of Avara’s business in the Wye catchment?*
- 5. We are aware that you supply chicken meat to the majority of the UK’s major supermarkets. Given the high standards of environmental compliance and supply chain integrity now expected by all the UK’s major food retailers, do you not believe that the widespread environmental degradation that is caused by the intensive poultry farming practises of your supply chain is directly in contravention of these standards expected by your major customers? For the record, it is our intention to raise this issue directly with them.*
- 6. On page 4 of the Strategic Report within Avara Foods’ Annual Report and Financial Statements for the year ended 31 May 2020 (your most recently filed accounts) you state that “Avara Foods is committed to conduct business in a manner that is environmentally responsible and sustainable”. This statement is then illustrated by examples around initiatives you support - including: energy management systems, low carbon technologies, encouraging healthy lifestyles, fighting hunger, and supporting education. However, within your environmental and sustainability reporting there is absolutely no reference to addressing what is arguably the most significant environmental issue facing your business – namely the severe ecological damage being done by your supply chain’s highly industrialised intensive agricultural practices. What is the justification for this very significant omission?*

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](mailto:Charles@riveractionuk.com)

**James Wallace**  
**Lord Randall**  
**George Monbiot**  
**James Macpherson**  
**Feargal Sharkey**