

Party: Claimants
Name: Andrew James Todd
Number: Seventh
Date: 5 May 2026

CLAIM NO: KB-2025-000136

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

B E T W E E N

**(1) WM MORRISON SUPERMARKETS LIMITED
(2) SAFEWAY STORES LIMITED
(3) WM MORRISON PRODUCE LIMITED**

Claimants

- v -

**(1) PERSONS UNKNOWN WHO ENTER AND REMAIN UPON ANY OF THE
DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THE CLAIM
FORM WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH
AGRICULTURAL PROTESTS**

**(2) PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO
THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWN ON THE
PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING
TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS**

Defendants

SEVENTH WITNESS STATEMENT OF

ANDREW JAMES TODD

I **ANDREW JAMES TODD** of Eversheds Sutherland (International) LLP, Water Lane, Leeds LS11 5DR
WILL SAY as follows:-

1. I am a Partner in the firm of Eversheds Sutherland (International) LLP and am responsible for the overall conduct of these proceedings on behalf of the Claimants.
2. Following the Claimants' application for an injunction in respect of the Claimants' Regional Distribution Centres ("**RDCs**") dated 15 January 2025, the Claimants were granted an

injunction by way of an order dated 16 January 2025 ("**Collins Rice J Order**") which was then continued by an order dated 20 January 2025 ("**First Fordham J Order**").

3. A subsequent injunction was then granted by way of an order dated 21 January 2025, which was amended on 24 January 2025 ("**Second Fordham J Order**").
4. The Second Fordham J Order (as amended) listed a further return date on 29 January 2025 ("**Further Return Hearing**"). Following the Further Return Hearing, the Claimants were granted a continuation of the injunction by way of an order dated 29 January 2025 ("**HHJ Tindal Order**").
5. The HHJ Tindal Order listed an early, short, review hearing on 12 May 2025 (the "**2025 May Review Hearing**") at which the court would consider the period and terms of any ongoing injunction.

THE HHJ LAVENDER ORDER

6. At the 2025 May Review Hearing, the Court had the benefit (amongst other documents) of my sixth witness statement which set out the Claimants' view that there continued to be a real and imminent risk of serious harm and the Claimants' Skeleton Argument dated 8 May 2025 (exhibited at "**AJT8**").
7. Following the 2025 May Review Hearing, the Claimants were granted continuation of the injunction by way of an order dated 12 May 2025 ("**HHJ Lavender Order**"), which operates with immediate effect until varied, discharged or extended by further order. The HHJ Lavender Order records that the Court was satisfied on the evidence and submissions before it:
 - 7.1 that the Claimants had taken all practicable steps to notify the Defendants of the Application prior to the hearing of 12 May 2025 pursuant to section 12(1) and (2) of the Human Rights Act 1998; and
 - 7.2 having carefully considered the grounds for the injunctions, the evidence and any arguable defences that might be raised by the Defendants, that: (1) the Claimants had a good cause of action in relation to each of the Distribution Centres and the Access Roads, in respect of which they are likely to succeed at trial pursuant to section 12(3) of the Human Rights Act 1998; (2) the Claimants had complied with the duty of full and frank disclosure; (3) there was sufficient evidence of a real and imminent risk of tortious activity and real harm; (4) there was no realistic defence to the claim; (5) there was a compelling justification for the injunctions sought; and (6) damages would not be an adequate remedy.
 - 7.3 That the relevant procedural requirements for the grant of injunctions against "Persons Unknown" had been established by the Claimants, that the terms of the Order were clear and appropriate and that, in the circumstances, that it was just and convenient to grant the injunctions sought.

8. The HHJ Lavender Order grants an injunction which, in general terms, prohibits the defendant from:
 - 8.1 entering, occupying or remaining upon any part of the Distribution Centres without the consent of the Claimants in connection with agricultural protests;
 - 8.2 creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants, its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the Access Roads in connection with agricultural protests.
9. As the HHJ Lavender Order expressly records in the recitals, the injunction does not prohibit any lawful protest outside the Distribution Centres in so far as any such protest does not obstruct any of the pedestrian and vehicular entrances or exits to the Distribution Centres.
10. The HHJ Lavender Order granted the injunctions subject to a further return hearing date with a time estimate of one hour to be listed on the first open date after 12 May 2026. The further return hearing has been listed on 13 May 2026 (the "**2026 May Review Hearing**").
11. The purpose of the 2026 May Review Hearing is to allow the Court, in line with the approach identified by the Supreme Court in *Wolverhampton City Council v London Gypsies and Travellers* [2023] UKSC 47 at [225], to consider how effective the order has been, whether any grounds for its discharge have emerged, whether there is any proper justification for its continuance and whether and on what basis any further order should be made.
12. I make this statement to confirm the steps taken to serve the Defendants with documents relating to the 2026 May Review Hearing and pursuant to the HHJ Lavender Order, including the discharge of the undertakings given to the Court at Schedule 3 to the HHJ Lavender Order.
13. This witness statement has been produced by me with the assistance of my colleagues, Louise Casey and Bethany Wilson.
14. The statements in this witness statement are from my own knowledge, save where I state otherwise. Where statements are matters of information or belief, I provide the source of that information or belief.
15. For ease of reference, this witness statement is divided into the following sections:
 - 15.1 Section 1 – Service of the HHJ Lavender Order and the 2026 May Review Hearing
 - 15.2 Section 2 – Disbandment of FTA
 - 15.3 Section 3 – Continuing Threat Since 2025 May Review Hearing
 - 15.4 Section 4 – Full and Frank Disclosure

16. I refer to an exhibit marked "**AJT8**" in this statement. It has been produced to me and I verify that the documents in those exhibits are true copies of the documents.

17. It remains evident that the farming community and various organised groups within the farming community are fully committed on a continuing basis to the protest movement to pressurise the UK government to abolish the proposed 20% inheritance tax on agricultural assets, despite the government increasing tax relief thresholds from £1 million to £2.5 million. Further, in recent months the protest movement is looking to pressurise the UK government on change to the trade deals they assert facilitates cheap food imports. That can be seen from the article published by Northampton Chronicle on 6 February 2026 named 'I spoke to angry farmers who caused chaos at a Sainsbury's distribution centre in Northampton today – here's what they told me' (exhibited at page 77-84 of **AJT8**):

"We were here, funnily enough, January 10, last year, doing a similar job with Morrisons. Then we had a lot of supermarkets come out in support of us, but as it turned out it was empty words. They haven't kept to those promises, they actually haven't changed anything since the last time we were here.

Sainsbury's, Tesco's, all the other major supermarkets are making the most of those trade deals and they're using it as an opportunity to buy in cheap and still sell on expensive. British farming will be finished. We simply can't compete."

18. In light of the continued commitment to direct action protest activity described in this statement, the Claimants seek a continuation of the injunctions as ordered by the HHJ Lavender Order on the same terms for a further period of 12 months until April 2027. The factual basis on which the Claimants seek that continuation is set out in this statement.

19. As set out in Section 3 to this witness statement, there is evidence of a continued commitment to protest activity at food distribution centres throughout 2026. The Court will note from the evidence set out at paragraphs 28 to 50 below details a series of targeted protests at competitor supermarket distribution centres between January and March 2026, together with continuing protest activity at supermarket stores and in central London into March 2026.

SECTION 1 – SERVICE OF THE HHJ LAVENDER ORDER AND 2026 MAY REVIEW HEARING

20. Paragraph 9 of the HHJ Lavender Order states that service of the order shall be validly effected on the Defendants by:

20.1 "Producing that a copy of the order is uploaded to the following website: www.morrisons-corporate.com/injunction

20.2 Sending an email to the email addresses listed in Schedule 4 to this order attaching a copy of this order; and

- 20.3 Affixing a copy of the order and the Plan applicable to the relevant Distribution Centre in A4 size in a clear plastic envelope at those locations marked with an "X" on the Plans.
21. From conversations and emails exchanged with relevant individuals providing instructions to this firm, I can confirm that:
- 21.1 The sealed HHJ Lavender Order was uploaded to www.morrisons-corporate.com/injunction on 13 May 2025 at 9:25am;
- 21.2 A copy of the HHJ Lavender Order was sent to info@farmerstoaction.org on 14 May 2025 at 11:24am; and
- 21.3 Copies of the HHJ Lavender Order and the applicable Plans were affixed at each of the RDCs between 11:40am on 13 May 2025 and 9:30am on 15 May 2025.
- 21.4 Accordingly, pursuant to paragraphs 10 and 11 of the HHJ Lavender Order, the date of deemed service of the Lavender Order was 15 May 2025.
- 21.5 Further, the Notice of Hearing for the 2026 May Return Date Hearing on 13 May 2026 was uploaded to the www.morrisons-corporate.com/injunction on 14 April 2026 at 9:24am; and
- 21.6 the Notice of Hearing for the 2026 May Return Date Hearing was served on the Defendants by email to info@farmerstoaction.org on 9 April 2026 at 13:26pm.
- 21.7 As is clear from my sixth witness statement, all documents relating to the HHJ Tindal Order have been served in accordance with paragraph 15 of the HHJ Tindal Order.

SECTION 2 – DISBANDMENT OF FARMERS TO ACTION

22. FTA formally disbanded on 14 November 2025. The group released a statement, posted on their website (exhibited at "AJT8"), confirming:

"Farmers To Action (FTA) is now formally disbanded. All memberships will be refunded in full.

FTA was created to help unite farming and defend itself - but over time, the structure became a distraction from the real fight.

What truly mattered, and what you achieved, was far greater: the farming community connected hundreds of farmers who had never met or spoken before.

Those connections now exist independently of any organisation - and that is something everyone should be proud of.

For too long, too much energy has gone into FTA itself rather than the fight we urgently need to win: saving Britain's farms and stopping this Labour government from further ruining the country. The focus must now return to action - not administration.

Two forthcoming National Unity events are happening on 24th and 26th November. These are organised by independent groups within the wider movement, and farmers from across the country are already getting involved. Details are circulating in the chats, and you can join in however you feel able.

The fight goes on - in every county, every region, every farm.

Look after each other. Stay connected. Communicate. Synchronise.

And remember: the decisions we are all pushing back against come from Westminster - and the strength to resist them lies with the farming community itself.

Thank you.."

23. Whilst this particular group confirmed its formal disbandment, their final statement makes clear that the objective of the organisers within the farming community remains the same; to pressurise and retaliate against the UK Government through protest action. The statement published on their website states "the focus must now return to action".
24. Farmers Weekly reported on the FTA's disbandment in an article dated 14 November 2025 and titled "Farmers To Action disbands but tractor rallies roll on" (exhibited at "AJT8" and available at [Farmers To Action disbands but tractor rallies roll on - Farmers Weekly](#)).
25. The article states that "While FTA's name will disappear, organisers insist the movement it helped galvanise will continue, but no longer confined to a single banner".
26. The following evidence addresses the action subsequent to the disbandment, providing clear evidence that the protest movement continues, albeit not via the formal group of the FTA.
27. I note that notwithstanding the formal disbandment of the FTA, the FTA's own statement confirmed that "the focus must now return to action" and referred to "forthcoming National Unity events" organised by "independent groups within the wider movement". The article in Farmers Weekly at the time of the announcement refers to a statement by the group that "farmers should now channel their efforts directly into national mobilisation rather than organisational administration."
28. Since the disbandment, protest activity at supermarket distribution centres has continued through decentralised, independent groups, as set out in Section 3 below. These groups coordinate through local networks and encrypted messaging channels to which the Claimants do not have access.

SECTION 3 – CONTINUING THREAT SINCE THE 2025 MAY REVIEW HEARING

29. Since the 2025 May Review Hearing, various articles and social media posts have been made, indicating a threat of future protest action at the Claimants' RDCs, which are subject to the injunctions ordered pursuant to the HHJ Lavender Order. There is clear evidence of targeted and synchronised protests at key competitor distribution centres, in the exact form the current injunctions prevent.
30. On 12 January 2026, farmers across the country carried out a targeted blockade of Tesco's distribution centres at various sites across the UK in Peterborough, Doncaster and Hinckley. A Farmers Weekly article reporting on the blockades is exhibited at "AJT8" and available at [Farmers blockade Tesco supermarket depots in surprise raid - Farmers Weekly](#).
31. On 12 January 2026, TikTok user, @Danielle.jo, posted a video of the farmers blocking the Tesco distribution centre at Doncaster. Another TikTok user, @Dave, commented stating:

"why only Tescos?? all supermarkets should feel the farmers protests"

(exhibited at "AJT8" and available at https://www.tiktok.com/@danielle.jo/video/7594513987140685078?is_from_webapp=1&sender_device=pc)
32. On 13 January 2026, a Farming Forum member posted the following comment on a thread entitled 'Its time to break rank' in relation to the strategy of protests at distribution centres:

"...The public will happily 'support' you all the way to an early grave..... The goal is to get this labour gov out now. The public overwhelmingly support THAT. And a lot of commentators are talking up a Starmer implosion ASAP.

If you are protesting without causing disruption (even if that just means having a few streets blocked with permission) then are you really 'protesting' at all???

Having been on a charity tractor run that accidentally blocked a Tesco depot when an old John Deere broke down on a critical roundabout: even when you are gridlocking Reading and inconveniencing people- the responses are 99 support beeps to 1 "pay your taxes!".

There has never been a better time to push the boundaries..."

(exhibited at "AJT8" and available at [Its time to break rank. | Page 24 | The Farming Forum](#))

33. On 22 January 2026, the BBC published an article named 'Farmers block Lidl site with tractor barricade' confirming protests at a Lidl distribution centre in Bedfordshire. The articles illustrated this was a targeted and synchronised attack:

"John Sanderson, a beef and arable farmer, said that similar demonstrations were taking place in Hertfordshire, Buckinghamshire and his home county of Northamptonshire."

(exhibited at "AJT8" and available at [Farmers block Bedfordshire Lidl site with tractor barricade - BBC News](#))

34. On 22 January 2026, Farmers Weekly published an article named 'Video: Farmers shut down Lidl depots in price protests' in relation to the distribution protest:

"...farmers have used tractors to blockade three Lidl distribution centres across England, including sites in Peterborough, Doncaster – close to Lidl's UK headquarters – and Houghton Regis near Luton.

The protests began just before 5am, with tractors blocking entrances and halting supply chain operations as deliveries were prevented from entering or leaving the sites.

At the Lidl regional distribution centre near Luton, the largest such facility in Europe, 14 tractors lined the entrance/exit access into the site, displaying placards reading "No British farming no food" and "Labour Liars"."

(exhibited at "AJT8" and available at [Video: Farmers shut down Lidl depots in price protests - Farmers Weekly](#))

35. On 22 January 2026, a Farming Forum member posted the following comment on the thread 'Tesco, ASDA, Morrisons, LIDL, Aldi, Co-op, Sainsburys all backing stopping Rachel Reeves IHT policy' in relation to the protests at distribution centres:

"Covertly and strategically blocking distribution centres in a way such farmers can't be prosecuted is the way to go if this evil tyranny of inheritance tax and the evil tyranny of immoral and illegal forcing farmers into parasitic farm assurance scheme which equates to ever declining farm income and ever increasing farm workload for the vast majority continues."

(exhibited at "AJT8" and available at [Tesco, ASDA, Morrisons, LIDL, Aldi, Co-op, Sainsburys all backing stopping Rachel Reeves IHT policy. | The Farming Forum](#))

36. On 23 January 2026, Farmers Weekly published an article named 'Frustrated farmers target ports in fresh protests' in relation to further protests at distribution centres:

"Farmers have staged tractor overnight protests at Felixstowe and Avonmouth ports, as part of a co-ordinated wave of demonstrations that is also targeting supermarket distribution centres.

Organisers say the aim of the protests was to raise public awareness of the government free trade deals which are facilitating cheap food imports at lower production costs and inferior food standards to those of UK farmers."

(exhibited at "AJT8" and available at [Frustrated farmers target ports in fresh protests - Farmers Weekly](#))

37. On 23 January 2026, a member of the Farming Forum posted the following comment on the thread 'Publicity' in relation to the lack of media attention to the protests:

"...

frankly the media feel this is all covered now so unless something different happens their interest will be hard to get

sadly that probably involves a significant escalation of the kind of action going on or real consequences like significant empty shelves or i hate to say it arrests or french style disruption

...

If you want my help i will do what i can but I'm not really in the loop in the direct action stuff"

(exhibited at "AJT8" and available at [Publicity | The Farming Forum](#))

38. In the same thread named 'Publicity', a member from the Farming Forum commented:

"Banning sewage sludge would have their full attention for the three weeks it would take to sort out IHT and farm prices."

(exhibited at "AJT8" and available at [Publicity | The Farming Forum](#))

39. On 23 January 2026, X user Sally Reform UK GBNEWS posted the following comment on a TheBritishPatriot post, dated 21 January 2026, in relation to blockading distribution centres:

"Supermarkets have had it their way for far too long. Exploiting those that can't fight back. Well they are fighting back now! @TESCO @AldiUK @LidlGB @sainsburys @markandspencer @waitrose @Morrisons @asda"

(exhibited at "AJT8" and available at [The British Patriot \(@TheBritLad\) 9K likes · 203 replies](#))

40. On 26 January 2026, a member of the Farming Forum posted the following comment on the thread 'Is the message finally getting through?' in relation to the protestors approach:

"To the extent I finally have to agree with Brian, the message isn't clear with these splintered protests and it needs to be. If you blockade a distribution centre you need a clear message. What is it? I'd suggest it's you need to double what I'm receiving ex farm to survive iht, if you cant Mr Tesco, then put your financial might at the government to tell them to back down completely."

(exhibited at "AJT8" and available at [Is the message finally getting through ? | The Farming Forum](#))

41. On 27 January 2026, Farmers' Voice published an article named 'Farmers to stage national supermarket protest later this week' in relation to further planned protests and confirmed:

"Organisers said the main aim is to "keep the press boiling" after every Thursday action through to 1 March, while they await responses from retailers."

UK family farmers are at breaking point. This IHT campaign challenges major supermarkets and the government to end policies and practices that are destroying family farms, food security, and rural livelihoods."

(exhibited at "AJT8" and available at [Farmers to stage national supermarket protest later this week - Farmers Guide](#))

42. On 30 January 2026, a member of the Farming Forum posted on the thread named 'True or False' in relation to the reporting of the protests:

"Are the reports of major farmer blockades at supermarket distribution centres and key ports true or false? I keep getting pictures on Facebook etc of massive tractor etc turnouts but see nothing about this anywhere else or even on here, so it is just Ai?"

In response to this, a Farming Forum member posted:

"Yes it is true but the media have not been reporting on the blockades. Makes you think people are being manipulated. Wellll actually they are."

(exhibited at "AJT8" and available at [True or false? | The Farming Forum](#))

43. On 6 February 2026, the BBC published an article named 'Farmers stage blockades outside supermarket depots' confirming further protest action, this time outside Sainsbury's Swan Valley distribution centre in Northampton, with a Sainsbury's spokesperson confirming:

"A group of farmers carried out protests at our Northampton and Pineham depots earlier today, and we have worked hard to minimise the impact of this action on our customers."

(exhibited at "AJT8" and available at [Farmers block Sainsbury's distribution centres in Northampton](#))

44. On 6 February 2026, TikTok user, @chrissyclaas, posted a video of the blockade at Sainsbury's Northampton which depicts an image of a tractor towing a vehicle with a large sign which states "STARMER YOU PLONKER!". Text on the video reads "F**cking Love the PASSION WE WILL NOT STOP... The COUNTRY IS BROKEN BACK THE FARMERS". The video is captioned:

"Supermarkets Lockdown.. FARMERS WE WILL NOT STOP"

45. TikTok user, @Diane, commented on the video stating:

"Well done all farmers fighting for your rights and giving a kick to the supermarkets who make billions off us whilst paying you lot a pittance"

(exhibited at "AJT8" and available at https://www.tiktok.com/@chrissyclaas/video/7603846238370319638?is_from_webapp=1&sender_device=pc)

46. On 6 February 2026, Northampton Chronicle similarly published an article named 'I spoke to angry farmers who caused chaos at the Sainsbury's distribution centre in Northampton today – here's what they told me' in relation to the distribution protest:

'Describing the situation to this newspaper, Phil, a fifth-generation Northamptonshire farmer, said: "So we've got around about eight tractors here at the entranceway into Sainsbury's truly locked off at the minute.

...

We were here, funnily enough, January 10, last year, doing a similar job with Morrisons. Then we had a lot of supermarkets come out in support of us, but as it turned out it was empty words. They haven't kept to those promises, they actually haven't changed anything since the last time we were here.

Sainsbury's, Tesco's, all the other major supermarkets are making the most of those trade deals and they're using it as an opportunity to buy in cheap and still sell on expensive. British farming will be finished. We simply can't compete.

...

We've spread the protest across all supermarkets, because essentially they're all as bad as one another. We want to try and get some meetings. We want to get meetings with the top CEOs of all supermarkets, get them round the table and start talking about fair pricing. If it can't go on, we're going to end up losing our farmers in the UK that cannot compete with the rest of the world."

(exhibited at "AJT8" and available at ['I spoke to angry farmers who caused chaos at a Sainsbury's distribution centre in Northampton today – here's what they told me'](#))

47. On 11 February 2026, the Express published an article named 'Furious farmers demand change as they descend on London in tractors' in relation to protests in London:

"...The demonstration saw multiple tractors head past Baker Street Station at around 11am on Wednesday morning (February 11), beeping horns, erecting flags and holding up traffic.

Pictures show them displaying signs including: "Stop FARMageddon" and "Our country needs EVERYONE. Let's all stand #TOGETHER. Other signs read: "DON'T LISTEN TO RACHEL THIEVES FROM ACCOUNTS! BACK BRITISH FARMING. "NO BRITISH FARMING, NO FOOD!" and "STARMER YOU PLONKER". There were reportedly around 10 tractors involved in the protest in London on Wednesday."

(exhibited at "AJT8" and available at [Furious farmers demand change as they descend on London in tractors | UK | News | Express.co.uk](#))

48. On 11 February 2026, X user FarmingUK made a post in relation to the protests in London:

"Farmers and their tractors are back in central London on a new protest, amid concern over the direction of government policy"

(exhibited at "AJT8" and available at [FarmingUK \(@FarmingUK\) 1K likes · 29 replies](#))

49. On 12 February 2026 Facebook page, Phil's Farming, posted images of a further blockade at Sainsbury's Basingstoke Distribution Centre, the post reads as follows:

"All Entrances/Exits Blocked

Won't be as many Lorrie's leaving that site tonight as there normally is!

Top job!..."

(exhibited at "AJT8" and available at [All Entrances/Exits Blocked ... - Phil's Farming](#))

50. On 13 February 2026, Farminguk published an article named 'Farmers target Tesco in NI as UK-wide inheritance tax campaign escalates' in which it is stated:

"Pressure is mounting on major supermarkets as Farmers For Action (FFA) enters its third weeks of protests in Northern Ireland over inheritance tax and farm income concerns.

Campaigners gathered outside the Tesco Superstore at the Meadows in Portadown, Co Armagh on Thursday evening (12 February), as part of what the group calls its "IHT Phase 2 Campaign".

(exhibited at "AJT8" and available at <https://www.bing.com/ck/a?!&&p=0151753a81070e852c4408afc054c280322c6e293de36f1dcd52ebdd393c7de1JmltdHM9MTc3NTAwMTYwMA&ptn=3&ver=2&hsh=4&fclid=3564297c-613b-6236-364b-3f8460806359&psq=Farmers+target+Tesco+in+NI+as+UK->

[wide+inheritance+tax+campaign+escalates&u=a1aHR0cHM6Ly93d3cuZmFybWluZ3VrLmNvbS9uZXdzL2Zhcml1cnMtdGFyZ2V0LXRlc2NvLWluLW5pLWFzLXVrLXdpcZGUtaW5oZXJpdGFuY2UtdGF4LWNhbXBhaWduLWVzY2FsYXRlc182ODAwOS5odG1s](https://www.farmersweekly.co.uk/news/inheritance-tax-campaign-escalates&u=a1aHR0cHM6Ly93d3cuZmFybWluZ3VrLmNvbS9uZXdzL2Zhcml1cnMtdGFyZ2V0LXRlc2NvLWluLW5pLWFzLXVrLXdpcZGUtaW5oZXJpdGFuY2UtdGF4LWNhbXBhaWduLWVzY2FsYXRlc182ODAwOS5odG1s)

51. I note that Farming Life reported on 27 February 2026 that the Farmers For Action "IHT Phase 2" protests at Tesco stores in Northern Ireland continued, with protests at Tesco Banbridge that week and a further protest planned at Tesco Enniskillen on 5 March 2026, described as "the sixth week of Phase 2 IHT and more protests" (exhibited at "**AJT8**").
52. On 3 March 2026, Farmers Weekly published an article named 'Video: Farmer protests return to London over inheritance tax' in relation to further protests in London:
- "... The latest protest comes just weeks before a High Court judicial review on 17-18 March. Campaigners hope this could delay the tax's introduction if the court finds the government failed to consult the industry properly."*
- (exhibited at "**AJT8**" and available at [Video: Farmer protests return to London over inheritance tax - Farmers Weekly](#))
53. The Farming Forum thread entitled "When the next london protest?" (exhibited at "**AJT8**") includes posts from members in early March 2026 discussing further protest action. On 5 March 2026, a member posted: "The threshold for IHT went up from £1m per farm to £2.5m per person" and members debated whether the IHT threshold increase was sufficient, with one member stating: "The Government aren't that stupid to realise the tractors could eventually stop most of the country. The public were rooting for us to do that."
54. On 20 April 2026, members of The Farming Forum posted on the thread entitled "Judicial review – 17th and 18th March 2026". A member ("Right-arm fast") enquired whether there was any news on the outcome of the IHT judicial review heard on the 17-18 March 2026, noting it had been "over a month" since the hearing. A forum moderator ("Chris F") responded on 27 April 2026 that "The normal timeline for getting an answer is between 6-8 months. So will likely be a while yet." The judicial review judgement had not been handed down as at the date of that statement. These are the most recent Farming Forum posts identified by the Claimants' monitoring and they post-date all other evidence referred to in this statement.
- (exhibited at "**AJT8**" and available at [Judicial review - 17th and 18th March 2026 | Page 3 | The Farming Forum](#))
55. The IHT changes which are the primary focus of the protest movement took effect on 6 April 2026. The Farmers Weekly article of 3 March 2026 referred to above noted that the protests came "just weeks before a High Court judicial review on 17-18 March" and that "Campaigners hope this could delay the tax's introduction if the court finds the government failed to consult the industry properly." As at the date of this statement, the IHT changes have taken effect and the UK Government has not reversed them.

56. As at the date of this statement, and based on the monitoring sources described in this section and in AJT8 (including mainstream media reporting, trade and sector outlets such as Farmers Weekly and FarmingUK, public social media posts, and The Farming Forum threads cited in this statement), I have not identified any further protests or blockades at UK supermarket distribution centres after the incidents set out above. I will file a supplemental statement if further incidents are identified before the 2026 May Review Hearing.
57. The protest movement has expressly identified the Claimants as a target. The Northampton Chronicle article of 6 February 2026 referred to at paragraph 46 above records a farmer stating: "We were here, funnily enough, January 10, last year, doing a similar job with Morrisons." That is a reference to the protest activity at the Claimants' Northampton RDC on 10 January 2025 which gave rise to these proceedings. The social media post referred to at paragraph 39 above expressly tags "@Morrisons" alongside other major supermarkets. The AJT8 exhibit also includes evidence that Farmers For Action sent formal letters to major supermarkets, including the First Claimant, demanding responses by 1 March 2026 as part of the "IHT Phase 2 Campaign" (exhibited at "**AJT8**").
58. The Courts have on four occasions been satisfied that real harm would be caused by direct action at the RDCs. As recorded in the recitals to the HHJ Lavender Order, the Court was satisfied that there is sufficient evidence of a real and imminent risk of tortious activity and real harm. The evidence which gave rise to grant the injunctions is summarised in the Claimants' skeleton argument for the 2025 May Review Hearing at paragraphs 9-10 (original threat) and paragraph 22 (harm) by reference to the evidence in my first, second and third witness statements and in the first witness statement of Scott Roberts. In summary, on 10 January 2025, protesters blockaded the Willow Green RDC by parking between 50 and 70 tractors at access points to the site between 19:30 and 08:30 the following morning. Go-slow drives also took place on roads near the Swan Valley, Latimer Park, Corby and Gadbrook RDCs. The evidence of Mr Roberts established that: (a) operational disruption at RDCs would pose a risk to food security nationally, including to vulnerable members of society; (b) blockades give rise to health and safety risks to persons at the sites; (c) there is a particular vulnerability arising from the presence of fuelling stations located at each site; and (d) the Claimants suffered loss and damage from the protest at Willow Green RDC.
59. The nature of the Claimants' operations at the RDCs has not changed since the HHJ Lavender Order was granted. The RDCs continue to be supplied and serviced by heavy goods vehicles and continue to supply food to the Claimants' retail stores. By way of example of the disruption caused by blockades at distribution centres, I note that the blockade at Sainsbury's distribution centre at Prologis Park, Pineham, Northampton on 6 February 2026 resulted in tractors blocking entrance and exit points from 5am, causing what was reported as "widespread disruption as dozens of lorries were unable to make deliveries" (exhibited at "**AJT8**").

60. In summary, since the HHJ Lavender Order was granted: (a) there have been no protests or incidents of unlawful activity at any of the eight RDCs; (b) the UK Government has not reversed the IHT changes, which took effect on 6 April 2026, notwithstanding the increase in the tax relief threshold from £1 million to £2.5 million; (c) in the period from January to mid-February 2026, the farming community carried out targeted blockades at competitor supermarket distribution centres, as set out in this statement; (d) protest activity at supermarket stores and in central London has continued into March 2026; (e) the protest movement has expressly identified the Claimants as a continuing target; and (f) no person has applied to vary or discharge the HHJ Lavender Order.

SECTION 4 – FULL AND FRANK DISCLOSURE

61. I am aware that the Claimants have to give full and frank disclosure and I confirm that the Claimants have given full and frank disclosure of all facts, matters and arguments which, after reasonable research, they are aware or could with reasonable diligence ascertain and which might affect the decision of the Court whether to grant the order or the terms of the order it is prepared to make.
62. With that duty in mind, there were a series of protests which did not take place at distribution centres. I note that on 11 February 2026 and 3 March 2026 there were posts and articles noting planned protests in central London (exhibited at “**AJT8**”).
63. I also note by way of full and frank disclosure that since the HHJ Lavender Order was made, there have been no protests or incidents of unlawful activity at any of the eight RDCs. During the period from January to mid-February 2026, there was a sustained programme of blockades at competitor supermarket distribution centres which are not protected by injunctive relief. My monitoring has not identified any further blockades at competitor distribution centres after the incidents described in Section 3 above, although protest activity at supermarket stores (as distinct from distribution centres) and in central London has continued into March 2026, and the IHT changes took effect on 6 April 2026.
64. The UK Government announced an increase to the IHT tax relief threshold from £1 million to £2.5 million. Despite that announcement, the protests have continued and escalated, as set out in this statement. Social media posts and articles exhibited at “**AJT8**” include statements from protesters that the campaign will continue until the IHT changes are fully reversed.
65. In the same Farming Forum thread referred to at paragraph 55 above, a member (“Wolds Beef”) posted: *“I guess it is the Government and judiciary trying to bury bad news!!”* and subsequently: *“Maybe the judges who deliberated fear for there [sic] own safety!!”*. I draw these comments to the Court’s attention. The Court will recall that at the hearing before HHJ Tindal on 29 January 2025, social media comments in a similar vein were before the Court, including *“fuck your injunction”*, *“ignore the injunction it’s nonsense”* and *“if we all*

go to Morrisons... they can't arrest us all" (as recorded in the Minute of HHJ Tindal's judgement at [**SB/312-313**]).

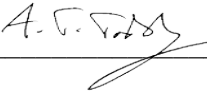
66. The formal disbandment of FTA on 14 November 2025 is addressed in Section 2 above.
67. I further note that the Claimants' solicitors have received no correspondence or representations from any person in response to the service of the HHJ Lavender Order or the Notice of Hearing for the 2026 May Review Hearing. No person has applied to vary or discharge the HHJ Lavender Order.

Statement of truth

I believe that the facts stated in this Witness Statement are true.

I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

I am duly authorised to make this statement on the Claimants' behalf.



Andrew James Todd

Date: 5 May 2026