

[REDACTED]
First Witness Statement

Party: Claimants

[REDACTED]
Date: 15 January 2025

Claim No:

**IN THE HIGH COURT OF JUSTICE
KING’S BENCH DIVISION
BETWEEN**

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

Claimants

- and -

**(1) PERSONS UNKNOWN AS DESCRIBED IN THE SCHEDULE 1 ATTACHED TO
THE CLAIM FORM**

**(2) PERSONS UNKNOWN AS FURTHER DESCRIBED IN THE SCHEDULE 1
ATTACHED TO THE CLAIM FORM**

Defendants

First Witness Statement of [REDACTED]

I, [REDACTED], of WM Morrison Supermarkets Limited, Hilmore House, Gain Lane, Bradford, West Yorkshire, BD3 7DL **WILL SAY AS FOLLOWS:**

1. I am employed by the First Claimant, Wm Morrison Supermarkets Limited, [REDACTED] [REDACTED] In this role, I am, amongst other things, responsible for [REDACTED] [REDACTED] which serve the First Claimant’s supermarket and wholesale business. [REDACTED] [REDACTED] though I previously worked for the First Claimant in [REDACTED] I worked for [REDACTED] [REDACTED] during the intervening years.
2. I make this witness statement in support of the application made by the Claimants for an injunction at the RDCs detailed below.

3. The facts and matters set out by me in this witness statement are either known by me directly and are true, or are known by me indirectly and are believed to the best of my knowledge to be true. In relation to matters falling into the latter category, I have set out the source of my knowledge and belief. This statement was prepared through email correspondence and discussions with the Claimants' legal representatives. I am duly authorised by the Claimants to make this statement.
4. I have read a copy of the accompanying witness statement of Andrew Todd , Joanna Goff and [REDACTED]
5. To assist the Court navigate this witness statement, it is made up of the following sections:
 - 5.1 Section 1: The Claimants' Business – Business Overview
 - 5.2 Section 2: Extent of the Injunctions Sought
 - 5.3 Section 3: The Protest Acton At Willow Green On 10 January 2025
 - 5.4 Section 4: Operational Disruption And Financial Harm Suffered From The Protest On 10 January 2025
 - 5.5 Section 5: Historic Protestor Action
 - 5.6 Section 6 Future Protests / Planned Action
 - 5.7 Section 7: Health And Safety Concerns And Security
 - 5.8 Section 8: Balance Of Convenience / Compelling Justification
6. I refer in this statement to pages from the accompanying exhibit marked "[REDACTED]". This exhibit has been produced to me and I verify that the documents in this exhibit are true copies of the documents.
7. I should say at the outset that the Claimants are not trying to prohibit or restrain peaceful and lawful protest, and accepts that this is a fundamental and important human right. They only seek to restrain protest activity that goes beyond that which is peaceful and lawful.

SECTION 1: THE CLAIMANTS' BUSINESS – BUSINESS OVERVIEW

8. The First Claimant, Wm Morrison Supermarkets Limited trades as 'Morrisons' – one of the UK's leading supermarket operators who employ over 100,000 people and procures, manufactures, markets, and supplies various products through in-store and online portals. The First Claimant and its group services 506 retail sites across the UK, including supermarkets and convenience stores that are 'non-specialised' stores processing the sale of food, beverages or tobacco predominating ("**the Retail Stores**"). The First Claimant and its group also supplies approximately 1,600 third party wholesale and convenience stores in the United Kingdom and internationally.
9. The principal activity of the Second Claimant is the operation of retail supermarket stores under the First Claimant's Morrisons brand. The principal activity of the Third Claimant is the purchasing and packing of produce for the First Claimant's business and third parties. The Second and Third Claimants are subsidiaries of the First Claimant.
10. Supplies for the Retail Stores are sourced both domestically and globally.
11. From a logistics perspective, the Retail Stores are supplied with goods delivered from the RDCs – details of which are publicly available on the First Claimant's website (<https://www.morrisons.jobs/locations/logistics-locations>). The RDCs also service the Claimants' online business and wholesale business. In general terms, the RDCs are based close to major motorways, so that products can be quickly unloaded, checked, stored, picked and dispatched. The RDCs which are the subject of these proceedings and in respect of which the Claimants' injunction application relates are located in:
 - 11.1.1 **Swan Valley - Swan Valley Way, Northampton NN4 9BD** is comprised of 3 sites, known as SV1, SV2 and SV3 and operates as a national distribution centre for both Retail Stores and the Claimants' wholesale supply business ("**Swan Valley**")
 - 11.1.2 **Stockton - 7003 Crofton Rd, Stockton-on-Tees, TS18 2QZ** which comprises of 3 warehouses for groceries, fresh produce and bread. This RDC supplies products to approximately 39 Retail Stores ("**Stockton**");
 - 11.1.3 **Sittingbourne - Fleet End, Kemsley, Sittingbourne ME10 2FD** supplies products to 83 Retail Stores, as well as supplying products for online fulfilment and wholesale customers, as well as providing the

Claimant's warehouses with stock for approximately 145 Retail Stores ("**Sittingbourne**");

- 11.1.4 **Gadbrook - King St, Rudheath, Northwich CW9 7WA** dispatches fresh and ambient products to 93 Stores, as well as supplying products for wholesale customers ("**Gadbrook**");
- 11.1.5 **Latimer Park - Altendiez Way, Burton Latimer, Kettering NN15 5YT** supplies 79 Stores with fresh and frozen products, as well as supplying products for online fulfilment and wholesale customers ("**Latimer Park**");
- 11.1.6 **Corby - 2 Halley Road, Corby NN17 5AN** supplies 79 Stores with fresh and frozen products , as well as supplying products for online fulfilment and wholesale customers ("**Corby**");
- 11.1.7 **Willow Green - Kings Dr, Bridgwater TA6 4FG** supplies fresh, ambient and frozen products to 76 Stores as well as supplying products for wholesale customers ("**Willow Green**"); and
- 11.1.8 **Wakefield - 41 Kenmore Rd, Wakefield Industrial Estate, Wakefield WF2 0XF** distributes ambient goods, bread and fresh and frozen products to 194 Stores ("**Wakefield**").

(Swan Valley, Stockton, Sittingbourne, Gadbrook, Latimer Park, Corby, Willow Green and Wakefield, together the "**Injunction Sites**")

SECTION 2: THE EXTENT OF THE INJUNCTIONS SOUGHT

- 12. Andrew Todd's witness statement sets out the extent of the Claimants' interests at each of the Injunction Sites.
- 13. As is more fully explained in Andrew Todd's witness statement, the extent of the land over which the Claimants seek an injunction at each of the Injunction Sites is shown on plans which accompany his statement.
- 14. On reviewing these, it will be appreciated that the Claimants are effectively seeking an injunction order which is either:
 - 14.1 limited to the extent of the land within their ownership; or

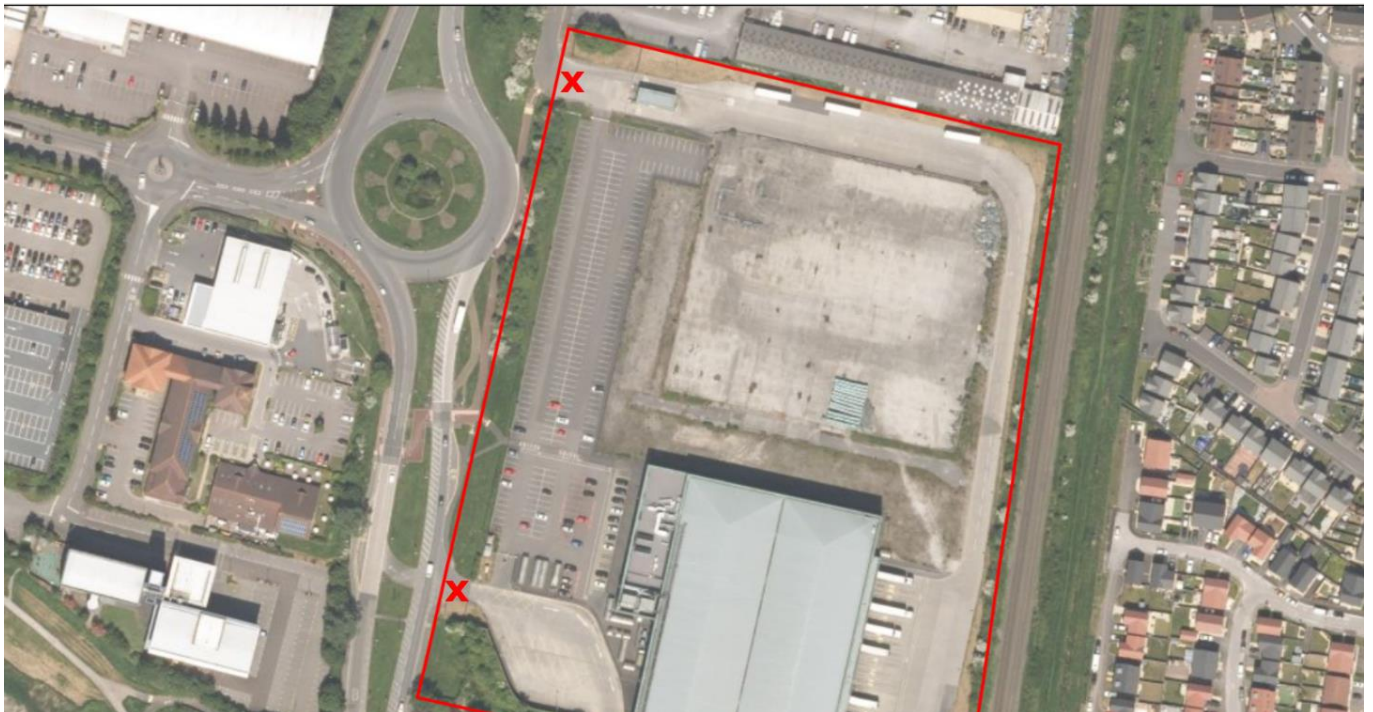
- 14.2 includes land over which the Claimants have a private right of way and/or a section of the public highway. The Claimants have carefully considered the extent of the area over which they seek an injunction and consider it necessary and appropriate to include such areas of land in order to ensure that they provide practical / real protection to the Claimants' business – in short as they are concerned that an injunction limited to the extent of the land within their ownership at such sites would, notwithstanding, enable protestors to disrupt operations at them practically.

SECTION 3: THE PROTEST ACTION AT WILLOW GREEN ON 10 JANUARY 2025

15. Media articles reporting on this protest action are exhibited to the accompanying witness statement of Andrew Todd.
16. I am aware from reading these articles and from discussions with relevant colleagues who were present at this site during the relevant period that, at approximately 19:30 on Friday 10 January 2025, a number of individuals, who appeared to be protesting in support of the "Farmers to Action" campaign, attended Willow Green and proceeded to block the entrance/exit way to the site.
17. The protest action was predominantly focused on the northern site at Willow Green and comprised of approximately 100 people and between 40-60 vehicles including tractors and other agricultural vehicles which were purposefully parked along Kings Road and around the roundabout from which direct access to this site is immediately obtained (the relevant roundabout being that which leads from Kings Road to Willow Green and then into the operational site). Access to the southern site at Willow Green was also impeded, however (as explained further below).
18. To assist with clarification of the location of where the tractors were stationed and the extent of the blockade, I have embedded two plans below:
19. The first plan relates to the northern site at Willow Green where the blockade was located on land within the ownership of the First Claimant title and which is the only point of access to this site. The tractors were parked around the roundabout shown and down along Kings Road to the approximate location shown with a 'X'.



The second plan relates to the southern site at Willow Green that has a 'one-way' style system for entrance/exit from the site. Both the entrance and exit points shown marked with an 'X' were blockaded with tractors.



20. The protest group remained in situ overnight, from approximately 19:30 on Friday 10 January 2025 through to approximately 08:30 on Saturday 11 January 2025. During this time, the protestors prevented any and all incoming delivery vehicles

from accessing this site as well as any and all outbound delivery vehicles from exiting it.

21. Two local police officers attended the site at approximately 20:30, but I understand, from relevant colleagues who spoke with them on site, that they simply undertook a risk assessment and indicated that they did not know how to deal with such a situation, were awaiting direction from more senior officers and that the police were likely unable to assist substantively due to staffing and resource issues before leaving.
22. I further understand from relevant colleagues based at the site that a further police officer attended the site at approximately 02:00am on Saturday 11 January 2025. I understand from my colleagues that they carried out an additional risk assessment, indicated that an aggravated trespass had likely been committed (a criminal offence) and again referred to the lack of available resource as a reason for not being able to assist in dispersing the protestors.
23. Although I was not in attendance, I was remotely controlling the incident from a Leadership perspective. At approximately 00:36am I spoke with a nominated spokesperson for the protestors via telephone (an individual named 'Martin' (their surname was not provided)). 'Martin' told me that the protest at Willow Green was a political protest and not a protest action directed against Morrison's business itself (albeit the protest action was taking place at one of Morrisons' RDC sites). 'Martin' explained to me that the protestors had targeted Morrisons in an effort to press it to champion the protestors' cause with Government and informed me that they would be back until the Government listened and their issues/concerns addressed.
24. The blockade was lifted and the protestors dispersed at approximately 08:30 on Saturday 11 January 2025.
25. For completeness, I should note that the protestors allowed staff members seeking to access/exit the site to do so and empty delivery vehicles returning to the site were also allowed access.

SECTION 4: OPERATIONAL DISRUPTION AND FINANCIAL HARM SUFFERED FROM THE PROTEST ON 10 JANUARY 2025

26. The protest at Willow Green had a substantial impact on the Claimants' business operations, which I outline in this section. The protest also gave rise to health and safety concerns, which are outlined in Section 7 below.

27. As outlined above, all planned outward deliveries from the site, which would have serviced numerous Retail Stores and customers of the Claimants' wholesale business, were prevented for the duration of the protest. Based on my knowledge and experience of the operations at Willow Green, I estimate that the protest action would have affected deliveries to approximately 76 Retail Stores and over 132 wholesale stores/deliveries.
28. Incoming vehicles, delivering stock to the site from the Claimants' suppliers, were also prevented access throughout the night. I understand that the vast majority of affected vehicles simply waited until the blockade was lifted to complete their delivery to the site. This will have had a direct impact on affected suppliers – many of these delivery vehicles will have contained deliveries for other customers (in addition to deliveries for the First Claimant) and they will inevitably have had to incur additional costs as a consequence of the delays experienced (e.g. additional salary costs).
29. Whilst the focus of the protest action was operations at Willow Green, there were consequential impacts to the Claimants' wider business – particularly to the Retail Stores business and wholesale customers. To expand on such impacts: -
 - 29.1 Delivery of chilled short-life products and fresh produce to various Retail Stores was delayed by approximately 12-18 hours and, furthermore, the delivery of ambient grocery products were delayed by up to 24 hours. The direct impact and cost of this is not yet known, but:
 - 29.1.1 the delay in the Retail Stores receiving delivery of such product meant that there were instances of Retail Stores being 'out of stock' of certain items for a period of time – which will have resulted in lost sales and had an reputational impact on the Claimants' business;
 - 29.1.2 additional staff were present at the Retail Stores which were expecting deliveries, but for the protest action, to sort and process the product on arrival. Additional staffing resources needed to be put in place as a consequence of the protest action, to ensure that sufficient staff were available for when the delayed deliveries ultimately arrived; and
 - 29.1.3 clearly, in respect of the products which have a limited shelf life, it is highly likely that not as much of it will now be sold before the expiry of it – meaning that there will likely be an increase in the level of 'waste'.

- 29.2 outgoing delivery drivers had been scheduled and were on shift to deliver the goods throughout the night as/when the blockade was lifted. It was not possible for such drivers to physically exit the site in their delivery vehicles during the course of the blockade. Further additional resources and drivers then had to be sourced in an effort to mitigate the effect of the impacted deliveries.
- 29.3 the Claimants' wholesale customers were significantly impacted - with approximately 132 deliveries to wholesale customers delayed. This will have directly affected the relationship between the Claimants and their wholesale customers as there are service level agreements in place, which the protest action will have impacted the Claimants' ability to meet, and which could have a financial impact and unfortunately could put contracts for current and future services at risk.
- 29.4 the above will clearly have also had an inevitable reputational impact on the Claimants' business - especially the fact that affected Retail Stores were 'out of stock' of certain items for a period of time.
30. It is very difficult to quantify the entirety of the loss / damage suffered by the Claimants' business as a whole. From purely a business perspective, however, I estimate that the protest action at Willow Green has caused them to suffer loss / damage of at least £200,000.00 - though it should be appreciated that this figure is likely to be greater as not all potential losses / damages have yet been realised. The impact that a coordinated direct protest action at all or multiple Injunction Sites would have, on the Claimants and their business, is not possible to quantify in advance - my expectation is that it would be very significant indeed and would result in millions of pounds of loss to the Claimants and their collective businesses and would be hugely detrimental to the Claimants' reputation.
31. As set out above, the Claimants have suffered loss and harm because of the Defendants' actions to date and it remains the case that they are likely to suffer further loss and irreparable harm if the Defendants are not restrained by injunctive relief.

SECTION 5: HISTORIC PROTESTOR ACTION

32. The recent protest action follows a pattern of behaviour from similar farmer protest groups who have targeted the Claimants in a similar manner, specifically blockades of RDCs, on multiple occasions over the past 18 years. This appears to be a tried and tested method of protest for farmers local to the relevant RDCs,

and an inference could be drawn that many of the local farmers would recall and/or may have been members of previous protests and seek to repeat such actions in future.

33. In 2012 to 2015, various demonstrations of protest activity took place with farmers protesting over milk prices.

2012

34. On the evening of 19 July 2012, protest group Farmers for Action ("**the FFA**") (which appears to be a separate group not associated with the current campaign in support of "Farmers to Action") carried out a demonstration at Willow Green involving 30 tractors blocking the entrances and exits to the site. This was reported by BBC News and is available via <https://www.bbc.co.uk/news/uk-england-somerset-18951702> and enclosed at pages 1-2 of the exhibit marked [REDACTED].

2013

35. On 22 April 2013, the FFA carried out further protest activity at two RDCs: Wakefield and Gadbrook. The demonstrations involved the protestors blockading the entrances and exits of these sites overnight with their tractors. The demonstrations were reported by Farmers Weekly and BBC News, the articles are available via <https://www.fwi.co.uk/business/dairy-farmers-blockade-morrisons-depots> and enclosed at pages 3-5 of the exhibit marked [REDACTED].
36. The Willow Green site was again the target of the FFA's protest action on 4 September 2013. 100 Farmers and 20 tractors blockaded the distribution centre. This was reported by ITV News (available via <https://www.itv.com/news/westcountry/update/2013-09-05/dairy-farmers-form-a-blockade-at-supermarket-depot/>) and ITV News (available via <https://www.itv.com/news/westcountry/update/2012-07-20/angry-farmers-protest-over-milk-prices/>), enclosed at pages 6-7 of the exhibit marked [REDACTED].

2014

37. The Willow Green site was targeted again by the FFA on 8 October 2014. The entrances to the site were blocked by tractors and members of the FFA group, protesting again in relation to the price of milk. The protest was reported by BBC News (<https://www.bbc.co.uk/news/uk-england-somerset-29543087>) and is enclosed at pages 8-9 of the exhibit marked [REDACTED].

38. Gadbrook was targeted on 30 October 2014 with tractors and other farm vehicles parked outside the entrances to the site reportedly for more than 4 hours. This was reported by Farmers Weekly (<https://www.fwi.co.uk/business/protestors-target-morrisons-over-milk-prices>) and is enclosed at pages 10-11 of the exhibit marked [REDACTED]
39. On 20 November 2014, FFA targeted Gadbrook and Willow Green. At Gadbrook, it was reported that up to 200 farmers used around a dozen tractors to block the entrances and prevent lorries from entering the site. The protester action at Willow Green was of the same nature. This was reported by Farmers Weekly (<https://www.fwi.co.uk/news/dairy-farmers-blockade-two-morrisons-depots>) and is enclosed at page 12 of the exhibit marked [REDACTED]).

2023

40. More recently, on 13 October 2023, the protest group Proud to Farm carried out protests across the country targeting the distribution centres of various supermarkets including Asda, Sainsbury’s, Tesco and Morrisons. Members of the protest group drove their tractors to the sites to block the entrances of the distribution centres. This was reported by the Farmers Guardian (<https://www.farmersguardian.com/news/4134765/supermarkets-targeted-night-farmer-led-protests>) and is enclosed at pages 13-15 of the exhibit marked “SR1”).
41. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

SECTION 6: FUTURE PROTESTS / PLANNED ACTION

42. The Claimants are aware that Farmers to Action have organised/are organising further protests scheduled to take place in the immediate future - on 17 January 2025.
43. As is noted in Andrew Todd’s witness statement, in addition to the direct protest action against the Claimants at Willow Green overnight on 10 January 2024, operators within the wider grocery sector were subjected to similar direct protest action – suggesting that the experience at Willow Green was not an isolated incident.

44. I would refer attention to the accompanying witness statements of Andrew Todd [REDACTED] (in particular) which set out the evidence of risk of anticipated further imminent protest action.
45. The Claimants are concerned that future protest action at the Injunction Sites will cause widespread disruption to the Claimants' business, on a national scale - resulting in a greatly increased scale of loss and impact on the Claimants' business. It should be appreciated that any greater, more widespread disruption will cause very significant and substantive impact to the country's grocery supply chain and will limit the availability of food in certain areas in my view (especially relevant for Retail Stores located in isolated, rural areas where there are a limited number of operators).

SECTION 7: HEALTH AND SAFETY CONCERNS AND SECURITY

46. The health and safety risks identified from the recent protest at Willow Green and which would be potentially associated with any future protest action at the Injunction Sites include, but are not limited, to:
- 46.1 Health and safety risks to individuals attending the protest, given the presence of heavy agricultural vehicles and delivery vehicles – I should note that I am particularly concerned by the presence of small children at the recent protest, who were running/playing near such agricultural vehicles;
- 46.2 the increased exposure to potential harm to the Claimants' employees arising from the movements of heavy agricultural vehicles and the risk of collision that their presence gives rise to;
- 46.3 the increased exposure to potential harm to individuals working at / visiting the Injunction Site predominantly, as well the Claimants' buildings, stock, vehicles etc. at the relevant sites during the course of any protest action. In my mind particularly is the very likely risk that, should an emergency incident arise, which requires the emergency services to attend, there will inevitably be a delay in the time it takes the emergency services to physically access the site whilst a protest is ongoing. It will take time for a significant number of agricultural vehicles (there were 40-60 present at Willow Green on Friday) to move and make way for the emergency services to attend – the inevitable delay this will cause represents a detrimental impact and further risk to life etc.;
- 46.4 concerns arising from the fact that each Injunction Site has a fuelling station on site. Whilst no action has been taken by protestors to date to gain access to the

fuelling stations, this is a risk that the Claimants have to be mindful of given the serious fire risk and potentially fatal consequences if someone decided to damage or interfere with these; and

- 46.5 there is a risk that disruptive individuals will seek to join any protest action at the Injunction Sites, 'tag along' and be more disruptive / destructive than the recent protest.
- 47. It is clear that the Claimants are responsible for the safety and security of all staff who use and work at the Injunction Sites. In this regard, I would note Section 2(1) of the Health and Safety at Work etc. Act 1974 which sets out that "*It shall be the duty of every employer to ensure, so far as is reasonably practicable, the health, safety and welfare at work of all his employees*".
- 48. Despite the safety and security measures in place to protect the public and staff at each Injunction Site, due to the unpredictable nature of protest actions, the Claimants are unable to accurately predict all potential health and safety concerns that might arise. The protest action taken on Friday 10 January 2025 did, however, give rise to security concerns which the Claimants are taking/have taken steps to mitigate. These are set out below:

Swan Valley	1x additional officer 2pm - Midnight Positioned on site boundary with Pedestrian barriers / gates The above measures have been implemented at each of the three sites making up Swan Valley (SV1, SV2 and SV3).
Stockton	2x additional officers 2pm - Midnight Positioned on site boundary with pedestrian barriers / gates
Sittingbourne	1x additional officers

	<p>2pm - Midnight</p> <p>Positioned on site boundary with pedestrian barriers / gates</p>
Gadbrook	<p>1x additional officer</p> <p>2pm - Midnight</p> <p>Positioned on site boundary with pedestrian barriers / gates</p> <p>1x mobile unit circulating the local area</p> <p>1x mobile CCTV van to be deployed Friday 17th</p>
Latimer Park	<p>2x additional officers</p> <p>1x positioned on inbound</p> <p>1x positioned at outbound</p> <p>2pm - Midnight</p> <p>Positioned on site boundary with pedestrian barriers / gates</p>
Corby	<p>1x additional officer</p> <p>2pm - Midnight</p> <p>Positioned on site boundary with pedestrian barriers / gates</p>
Willow Green	<p>1x additional officer on site boundary with pedestrian barriers / gates</p> <p>1x mobile unit circulating the local area</p> <p>1x mobile CCTV van to be deployed Friday 17th</p>

	<p>In addition for part of the site, 2 x additional officers (1x positioned on inbound and 1x positioned at outbound)</p> <p>2pm - Midnight</p> <p>Positioned on site boundary with pedestrian barriers / gates</p>
<p>Wakefield</p>	<p>2x Additional officers</p> <p>Gate 1 - 1x Additional officer on main inbound</p> <p>Gate 2 - 1x Additional officer on main outbound</p> <p>2pm - Midnight</p> <p>Positioned on site boundary with Pedestrian barriers / gates.</p> <p>1x Mobile unit covering remaining entrance / exits and fuel station</p>

49. Whilst these preventative actions are being taken, I do not consider them to be sufficient to protect fully the Injunction Sites against future incursions or protests. This is due to the likely size and scale of the threatened protests, considering that approximately 100 people and between 40-60 vehicles attended the protest at Willow Green on 10 January 2025, the additional measures are unlikely to protect adequately the Injunction Sites from that amount of protestors. Further, the inability of the police to provide adequate support due to under-staffing and being unaware of how to deal with the protest (as described in paragraph 21 of this statement) means that additional measures above and beyond this are needed in order to protect the Injunction Sites appropriately in the light of the anticipated protest action by the Defendants. Against this, I strongly believe that a court injunction will have a deterrent effect and will help prevent the occurrence of unlawful protest action at the Injunction Sites.

50. The actions taken thus far are flexible in nature as the Claimants are aware that they may need to adapt/change at very short notice, depending on how any protest action unfolds.

SECTION 8: BALANCE OF CONVENIENCE / COMPELLING JUSTIFICATION

51. The Claimants consider that: -
- 51.1 unless an injunction is granted, there is a serious risk of disruption at the Injunction Sites on Friday 17 January 2025 (or sooner);
- 51.2 the Injunction Sites are an obvious target for protestors given they have been the subject of protest action historically, and more recently which has attracted media coverage of the protestors cause;
- 51.3 it is important to note that a number of the Injunction Sites are accessible via single access routes and are therefore susceptible to being blockaded relatively easily;
- 51.4 a blockade at all or a substantial number of the Injunction Sites would have a substantive impact on the country's grocery supply chain and could limit the availability of food in certain areas (especially relevant for Retail Stores located in isolated, rural areas where there are a limited number of operators);
- 51.5 damages would not be an adequate remedy for the Claimants for the reasons set out in this and the accompanying witness statements;
- 51.6 for the avoidance of doubt, the Claimants are not intending to prohibit any lawful protest but they need to prevent unlawful incursions onto and obstructions to their land which inhibit their ability to carry out their business. There is no realistic likelihood of anyone in the class of Persons Unknown suffering any actionable loss or needing compensation in damages; and
- 51.7 the grant of an injunction to prevent/restrain protestors from entering onto the Injunction Sites and preventing access to them would provide an effective deterrent for protestors who might otherwise contemplate direct action (given the breach of such an injunction would carry the risk of imprisonment for contempt of court) and mitigate the apprehended harm.

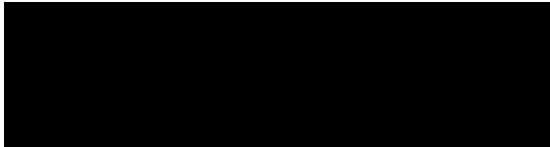
52. In the light of the evidence contained within the accompanying witness statement provided [REDACTED] the Claimants very much consider that the RDCs are a target of further protest action this week. Against that background, I understand from the Claimants' solicitors that the Claimants are required to provide full and frank disclosure of matters which might affect the decision making of the Court. I accordingly note that there is an indication that supermarkets will also be targeted and/or will be the primary target of the intended action on 17 January 2025 (as particularly evidenced by a post on the Farming Forum website "["Supermarket Meet" tractors - 17th January | The Farming Forum](#)") and exhibited at pages 16-21 of Exhibit [REDACTED]). In response to this possibility, however, I would comment that:

- 52.1.1 some members of the public may be using the word 'supermarket(s)' synonymously with the supermarkets' distribution centres, and more specifically with Morrison's RDCs;
- 52.1.2 there are comments to online posts of supports/members of FTA which indicate that there is an understanding amongst protestors that carrying out blockades of Morrison's RDCs stands to cause the most disruption to the Claimants' supply chains as set out in the accompanying witness evidence;
- 52.1.3 the Claimants have limited the proposed injunctions to land within the operational limits of the RDCs to the extent necessary to ensure access to/from the RDCs is not disrupted by protest action, and does not extend to its supermarkets; and
- 52.1.4 there is a historic pattern of behaviour of similar direct protest action at Morrison's RDCs.

53. In light of the credible threat of the proposed protest activity, the recent protest events at Willow Green and the historic experience of protest action at RDCs, and the harm that would be caused if the proposed protest came to pass, it is respectfully asked that the Court grant the injunctive relief that is set out in the draft orders that accompany this claim.

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 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 behalf of the Claimants.



Signed



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Dated 15 January 2025