

- 1) Made on behalf of the Claimants
- 2) DA Ford
- 3) First Witness Statement
- 4) Exhibit DAF1
- 5) Dated 22 October 2025

CLAIM NO: M10SE015

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

BETWEEN

(1) SHEFFIELD ENVIRONMENTAL SERVICES LIMITED

(2) VEOLIA ES SHEFFIELD LIMITED

(3) VEOLIA ES (UK) LIMITED

Claimants

and

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF DEAN ANTHONY FORD

I, Dean Anthony Ford of Veolia Sheffield Depot, Lumley Street, Sheffield, S4 7ZJ (the "Lumley Street Depot"), will say as follows:

SECTION A: INTRODUCTION

1. I am a Regional Director at Veolia ES (UK) Limited ("Veolia UK"), based at the Lumley Street Depot. I have been in this role since 24 June 2025. My predecessor in this role retired on 31 May 2025. Prior to joining Veolia UK, I was Head of Mobilisation for a facilities management provider. In my current role, I have responsibility for Veolia's delivery of its contract with Sheffield City Council.
2. For convenience, in this statement I will refer to "Veolia", "we", or "our", meaning, generally, the Veolia group, unless the context requires me to refer to the First, Second, or Third Claimant specifically.
3. By virtue of my role, I have been involved in matters relating to the injunction which was granted by order of Mrs Justice Stacey on 13 June 2025 (the "Injunction Order").
4. I am duly authorised by the Claimants to make this witness statement on behalf of the Claimants in support of their application for an extension of the Injunction Order (the "Injunction Extension Application").
5. Since joining Veolia UK, I have been involved in the matter which is the subject of the Claimants' Injunction Extension Application. Where I refer to events prior to my joining, I do so based on information provided to me by colleagues or from reviewing contemporaneous documents or video footage, and I make this clear in my statement.
6. I have had sight of the documents that were filed by the Claimants in support of the injunction application including the First Witness Statement of Elizabeth Johnson dated 4 June 2025 ("Johnson 1") and the Second Witness Statement of Elizabeth Johnson dated 10 June 2025 ("Johnson 2") which set out the matters relating to the legality of the strike action conducted by Unite the Union ("Unite") and details of the relevant ballots for industrial action held by Unite.

7. The facts and matters to which I refer in this witness statement are true to the best of my knowledge, information and belief. Where I rely upon others or documents as the source of my knowledge, I set out the source of that information, which is also true to the best of my knowledge, information and belief.
8. I exhibit to this statement a paginated bundle of documents marked “**DAF1**” to which I shall refer in the course of this statement. References in this statement in the form **[DAF1/[•]]** are to pages of Exhibit DAF1.
9. My statement is structured into the following sections (this introduction being Section A):
 - (A) Section B: Update on factual background since the Injunction Hearing;
 - (B) Section C: July Mass Picket;
 - (C) Section D: August Mass Picket;
 - (D) Section E: Events since the August Mass Picket;
 - (E) Section F: Continuing threat of direct action and the strike;
 - (F) Section G: Harm of the direct action and impact of the Injunction Order;
 - (G) Section H Identifying the Defendants; and
 - (H) Section I: Duty of full and frank disclosure.

SECTION B: UPDATE ON FACTUAL BACKGROUND SINCE THE INJUNCTION HEARING

10. Since the hearing of the Claimants’ application for an injunction on 13 June 2025 (the “Injunction Hearing”), there are some updates on the factual background set out in Johnson 1 and Johnson 2.

11. The first update is that as of 22 August 2025, Elizabeth Johnson (former Interim Contract Manager) has left Veolia. Steve Taylor (former Operations Manager) has also left Veolia as of 20 June 2025.
12. In paragraphs 27 to 28, of Johnson 1, Ms Johnson explained that as a result of the direct action that had started on 11 April, Veolia had rented a site at Beeley Wood Lane, Sheffield, S6 1QT (the "Beeley Wood Site") to use as a contingency in order to deal with disruption from the direct action (see the explanation of the Contingency Site Plan at paragraphs 57 and 87(C) of Johnson 1). Since the Injunction Order, I understand from my colleague Nick O'Neill, Contract Manager, that Veolia served notice to terminate the lease at the Beeley Wood Site, and that the lease ended on 13 August 2025. I understand from Lee Heywood (Veolia Estates Manager) that on 23 June 2025 Veolia gave notice to terminate the licence at Beeley Wood Site, and that the licence ended on 13 August 2025. I understand from Nick O'Neill that, in June, before either Mass Picket (as defined later), it was decided that the Beeley Wood Site was no longer required. However, I note that it was used as a contingency site during the July Mass Picket (as explained at paragraph 17 below) because, despite giving notice to terminate the lease, we still had access to and use of the site.
13. Since the Injunction Order, as I understand from my colleagues and as I have observed since starting on 24 June 2025, since the Injunction Order, individuals have continued to picket in Lumley Street, generally on Tuesdays, Wednesdays and Thursdays. The number of individuals picketing varies depending on the day and the weather, but there are usually between 6 to 15 individuals picketing.
14. For the details of direct action that took place between the granting of the Injunction Order and prior to the mass picket on 9 July 2025, please see paragraphs 15 to 26 of the witness statement of Sophie Garraty ("Garraty 1").

SECTION C: JULY MASS PICKET

15. On 1 July 2025, the Socialist Worker published an article on their website that stated that “workers have called a mega picket for Wednesday 9 July that could re-energise the strike. It is inspired by the mass picket on 9 May, where striking bin workers shut down the Lifford Lane depot”¹ [DAF1/5-7]. The article stated that the “mass picket” would be taking place at the Lumley Street Depot at 06:00 am on 9 July 2025 (the “July Mass Picket”).
16. On 7 July 2025, Veolia’s admin team emailed the Socialist Worker newspaper, to inform it that Veolia had obtained the Injunction Order, including in respect of the Lumley Street Depot, and provided a link to the Sheffield Veolia website where the Injunction and related documentation could be viewed [DAF1/8]. The email explained that individuals are prohibited from, amongst other things, “blocking or obstructing the exiting or entering of any other individual or vehicle to or from the sites protected by the Injunction where done in support of the strikes organised by Unite and without Veolia’s consent”, and that individuals are prohibited from doing such actions by themselves or by means of another person acting on their behalf or instructions. This email was copied to Mr Joseph Diviney, Mr Alistair Tice, and Mr Joel Mayfield [DAF1/8].
17. In preparation for the July Mass Picket we decided to split the RCVs between Lumley Street, the Beeley Wood Site, Tinsley Park Road, and the ERF by moving them the night before, and by preparing for the RCVs at Lumley Street to leave earlier than usual. This decision was made to minimise the risk of disruption to Veolia’s operations. I was involved in implementing this approach.
18. On the day of the July Mass Picket I arrived at the Lumley Street Depot at approximately 05:17 am. The RCVs started to leave the Lumley Street Depot at approximately 05:30 am, shortly before the July Mass Picket was

¹ <https://socialistworker.co.uk/news/join-the-mega-pickets-in-sheffield-and-birmingham/> [accessed 21 September 2025] [DAF1/5-7].

scheduled to start at 06:00 am. I observed that some individuals had already gathered by this time, and although they shouted at the RCVs as they were leaving, no RCVs were physically prevented from leaving.

19. I understand from Nick O'Neill that approximately 8 individuals gathered at the Beeley Wood Site and tried to block RCVs from leaving, but the majority of the RCVs had already left the site at approximately 06:30 am by the time these individuals arrived. However, they did manage to hold up two RCVs until approximately 07:30 am.
20. After the RCVs had left the Lumley Street Depot, protesters continued to arrive. I estimate that at the height of the protest there were approximately 30 to 40 individuals in total. Many of the individuals were blocking traffic on the road. At 08:20 am, the remaining individuals left the Lumley Street Depot and marched to the ERF site on Bernard Road by walking down Lumley Street.

SECTION D: AUGUST MASS PICKET

21. On 14 August 2025, a number of people at Veolia became aware of posts made by 'Unite for a Workers' Economy' on social media websites X **[DAF1/9]** and Facebook **[DAF1/10-11]** calling for people to "*join the one year anniversary of the Sheffield Bin Strike*" **[DAF1/9]** and take part in a "*solidarity rally*" **[DAF1/10-11]** on 19 August 2025 from 06:00 am at the depot, and from 10:00 am at Tinsley Park Road (the "August Mass Picket"). The poster for the August Mass Picket featured the logos of a number of organisations which appeared to support the rally **[DAF1/10-11]**.
22. On 18 August 2025, Veolia's admin team sent an email to the organisations listed in the poster to inform them that Veolia had obtained the Injunction Order, including in respect of the Lumley Street Depot and Tinsley Park Road and provided a link to the Sheffield Veolia website where the Injunction and related documentation could be viewed **[DAF1/12-13]**. The email explained the prohibitions contained in the Injunction Order in the same terms as the 7 July 2025 email referred to at paragraph 16 above.

23. As explained above, the Beeley Wood Site was surrendered back to the landlord on 13 August 2025, so we were not able to prepare for the August Mass Picket by splitting the RCVs between the Lumley Street Depot and the Beeley Wood Site as we had done with the July Mass Picket.
24. I was present at the Lumley Street Depot on 19 August 2025 from around 06:00 am, and I saw people starting to gather for the August Mass Picket. The number of individuals increased throughout the morning, reaching approximately 120 at the peak. The atmosphere became more hostile as the morning went on, with footballs being kicked at cars, and air horns and loud music being played. I saw some speeches being given, but I did not know the names of those involved.
25. During the time it took to undertake our usual crew checks prior to leaving the depot, the number of protesters increased quickly.
26. I have reviewed various pieces of video footage taken during the August Mass Picket, including:
- (A) CCTV at the depot (the “**CCTV Footage**”) [DAF1/14 and DAF1/26];
 - (B) Dashcam footage from front of the first RCV that attempted to leave the depot (the “**Dashcam Footage**”) [DAF1/17];
 - (C) a YouTube video uploaded by DonkeyDave269 of the August Mass Picket (the “**August YouTube Footage**”²); and
 - (D) Other footage recorded from the RCVs.
27. Whilst I did not recognise all of the individuals at the August Mass Picket, I did recognise one individual, ‘Dave’, who goes by the name of ‘DonkeyDave269’ on YouTube. Having reviewed the above-mentioned

² <https://www.youtube.com/watch?v=vgEQRere424> [accessed 19 August 2025] [DAF1/22].

footage, I understand that the following individuals are identifiable in the footage as follows:

- (A) Mr Diviney was wearing black trousers, a light-coloured top, a black jacket with a yellow badge, and a dark-coloured baseball cap marked with “Orgreave”. He was also carrying a black megaphone;
- (B) Mr Tice was wearing a light blue t-shirt over a dark long sleeve t-shirt and wearing a backpack. He was also carrying a distinctive cardboard sign stating “*Please slow as per injunction, take a flyer, talk to picket, solidarity*”; and
- (C) Dave was wearing a white t-shirt, a white fedora hat with a navy blue ribbon, and can be seen recording himself.

28. I set out a summary of what happened as the first RCV tried to leave the depot:

- (A) Initially, before the first RCV approached the yellow painted private property line, there were approximately 40 individuals stood in the road in front of the exit lane and the entrance lane (see image 1 [DAF1/15] below). I can be seen in the image below stood behind the 10 miles per hour sign (circled in blue), standing next to Nick O’Neill. I was wearing a black Veolia jacket and dark trousers.

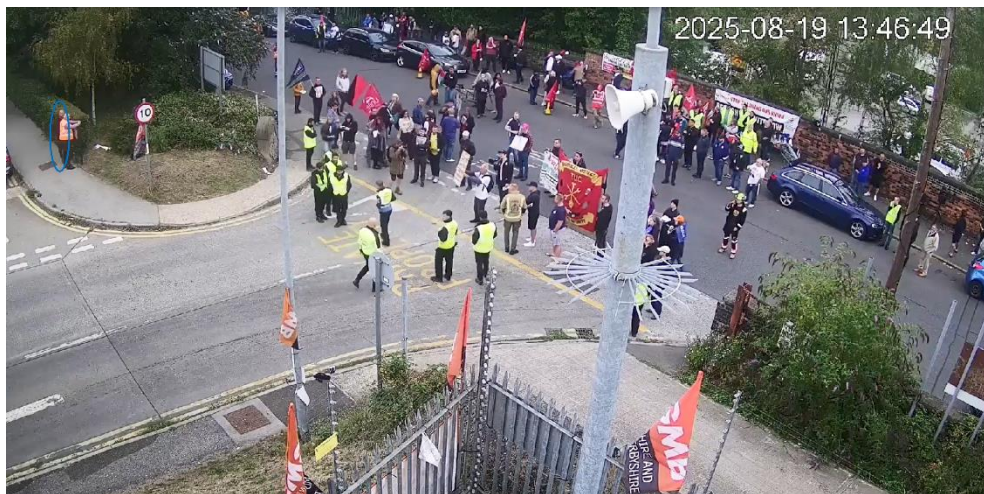


Image 1: Screenshot of CCTV Footage on 19 August 2025 at 06:46:49.³

- (B) At around 06:46 am, we decided to make an attempt to exit the Lumley Street Depot using the smallest RCV possible. I considered that using the smallest possible vehicle would present less of a risk to the individuals standing in the road and to our colleagues. Another concern was to minimise the difficult situation that our drivers would face compared to using one of the larger RCVs. I understand from Elizabeth Johnson that one of my colleagues had spoken with the driver of the first RCV prior to the attempt to advise him on how to do so safely, by moving out very slowly and by inching forwards. I was observing the first RCV's exit attempt to make sure that it was proceeding safely. My main concern was for the safety of everyone involved.
- (C) At approximately 06:47, as the first RCV began to approach the yellow property line, there were still a number of individuals directly in front of it (see image 2 [DAF1/16] and image 3 [DAF1/18] below).



Image 2: Screenshot of CCTV Footage on 19 August 2025 at 06:47:00

³ Please note that the timestamp on the CCTV Footage is seven hours ahead.



Image 3: Screenshot of Dashcam Footage on 19 August 2025 at 06:47:00.

(D) As the driver of the first RCV then inched forwards so that the RCV was very close to the yellow property line, the individuals directly in front of the RCV moved to the side of the RCV (see the CCTV Footage [DAF1/14] and the Dashcam Footage [DAF1/17] at 06:47:00 to 06:49:00 and image 4 [DAF1/19] and image 5 [DAF1/20] below).



Image 4: Screenshot of Dashcam Footage on 19 August 2025 at 06:48:15.



Image 5: Screenshot of CCTV Footage on 19 August 2025 at 06:48:27.

- (E) Despite this movement to the side, it was not safe for the first RCV to proceed because it needs space either side of the vehicle in order to turn safely and there were many people located very close to the vehicle (see image 6 below) [DAF1/21]. I moved across to the right-hand side of the vehicle to observe the attempt to exit. I can be seen standing next to Elizabeth Johnson in image 6 below (circled in blue).



Image 6: Screenshot of CCTV Footage on 19 August 2025 at 06:49:00

- (F) There were also individuals who were holding up banners and placards and/or trying to communicate with the driver of the first RCV. For example, there was a large red banner held up by individuals on the right-hand side of the exit lane. They would have further obstructed the vision of the driver so that he was not able to see oncoming traffic for the purposes of turning left or right (see image 6 [DAF1/21] above).
- (G) Mr Alistair Tice, seen carrying a cardboard sign approached the driver's side of the first RCV and put the sign against the window obstructing and obscuring the driver's right-side view of Lumley Street (see image 7 [DAF1/23] below, which is in fact a mirror-image).



Image 7: Screenshot of August YouTube Footage at 15:36 mins

- (H) A woman in a grey hoodie approached the front of the first RCV and put a flyer under the windscreen wiper (see image 8 [DAF1/24] below).



Image 8: Screenshot of August YouTube Footage at 15:42 mins

- (I) Altogether they would have further obstructed the vision of the driver so that he was not able to see oncoming traffic for the purposes of turning right.

- (J) As a result, I made the decision that it was not safe to continue the attempt to exit because of the risk to the driver and to the individuals around the RCV. I thought that all of the individuals standing beyond the yellow private property line and before the white end-of-road markings were standing too close to the vehicle. I thought that the individuals standing in the main road were also contributing to it not being a safe environment for the RCV to exit. The RCVs are heavy vehicles and require a lot of control. I was concerned about the impact on the driver if he were to slip on the controls and injure one of the individuals, and I was also concerned to avoid injuring any of the individuals. I advised the team to tell the driver of the first RCV to reverse. At 06:49 am, the RCV reversed backwards over the private property line towards the depot (see image 9 [DAF1/25] below).



Image 9: Screenshot of CCTV Footage on 19 August 2025 at 06:49:38

29. I believe that one purpose of some or many of these individuals standing in front of and in close proximity to the first RCV attempting to exit the Lumley Street Depot was to obstruct and/or block the exiting of the RCV from the depot. In the August YouTube Footage, an individual who I understand to be called Mr John Dunn can be heard saying that “*we’ve stopped one from exiting at least*”.⁴ This was after the first RCV was prevented from leaving the Lumley Street Depot.
30. After the first RCV reversed back behind the private property line, a series of individuals made speeches outside the depot. In the August YouTube Footage, at 07:19 am, Mr Dunn gave a 3-minute speech to the crowd in which he repeatedly called Veolia workers “*scabs*” and said “*fuck the scabs, fuck Veolia*”.⁵
31. The police were not at the Lumley Street Depot during the first attempt to exit. They arrived later. I interacted with police officers who attended the site. Between approximately 08:45 and 09:30 am, whilst a majority of the

⁴ August YouTube Footage, at 17 mins 17 secs [DAF1/22].

⁵ August YouTube Footage, at 49 mins 8 secs [DAF1/22].

individuals had left, a group of approximately 30 individuals remained. As the numbers had started to die down and people continued to leave, I thought we could make another attempt for the RCVs to exit the Lumley Street Depot. The police had also arrived by this time and individuals were continuing to leave the picket. Some individuals continued to stand in front of the private property line and walk in front of RCVs, however, because the crowd had thinned, the RCVs were able to leave the depot. As the RCVs were leaving, there were a couple of incidents that I wanted to highlight:

- (A) At approx. 08:53 am, approximately 10 individuals were stood in front of a second RCV. The individuals were slow to move out of the way, but eventually did move, allowing the RCV to turn right out of the exit (see CCTV Footage in my exhibit **[DAF1/26]**).

- (B) I recall a specific incident where a police sergeant detained an individual who had allegedly spat at one of our vehicles. Although I did not personally see the spitting, the police sergeant told me that he had witnessed it and spoke to the individual about their conduct. I understand from footage from the RCVs that this individual had been repeatedly spitting at the vehicles, I include in my exhibit a video of one instance of this individual spitting at an RCV as it was turning left out of the depot at 8:59 am **[DAF1/28]**. In image 10 below **[DAF1/29]** (which is a mirror-image), I can be seen standing next to Elizabeth Johnson (circled in blue) and the individual who was spitting at the RCVs is wearing a green beanie and a black coat (circled in red).



Image 10: Screenshot from Rear RCV Footage on 19 August 2025 at 08:59:31.

- (C) At approximately 09:03 am, one of the last RCVs to leave the depot wanted to turn right. As it approached the yellow private property line, individuals that were standing in front of the vehicle's path did move aside, but the RCV stopped. As the vehicle stopped, Mr Tice tried to hand the driver a leaflet [DAF1/27] and there was a short delay in the vehicle leaving the site.
32. After the individuals left Lumley Street at approximately 09:00 am, I understand from my colleague Elizabeth Johnson that they arrived at Tinsley Park Road at approximately 09:45 am. I did not go to Tinsley Park Road. However, according to Ryan Coughlan (Operations Manager at Veolia) and Elizabeth Johnson, there were approximately 20 individuals gathered there in total, with people standing in front of each of the entrance and the exit. Amongst the individuals were Mr Diviney, Mr Tice, Mr Shane Sweeting (Regional Officer for Unite), Mr Paddy Hill (an organiser for Unite), and Mr Mayfield (a member of Unite).
33. I understand from my colleagues, Ryan Coughlan and Elizabeth Johnson, that individuals were standing and/or sitting around the entrances and exits to the site and that those individuals' vehicles were parked opposite the exit to the Tinsley Park Road site. The parked vehicles made it difficult for RCVs

and other vehicles to exit the site because they reduced the amount of space they had to manoeuvre. Most of the protestors left around 11:30 am.

34. The next day, on 20 August 2025, Mr Alistair Tice published an article on the Socialist Party website, in which he stated that “*despite a High Court Injunction, strike supporters exercised their right to ask drivers to stop, take a leaflet, have a conversation. The first wagon due out didn’t try to leave the depot, and all the refuse trucks were delayed by two hours, giving the strikers a huge boost*” [DAF1/30-31]. From my perspective, Mr Tice is wrong to say that “*the first wagon due out didn’t try to leave the depot*”. We did attempt a safe exit; however, due to the proximity of the individuals to the vehicle, the decision was rightly made not to proceed in order to avoid any further risk from a health and safety perspective to the driver, our colleagues, and the individuals themselves.

SECTION E: EVENTS SINCE THE AUGUST MASS PICKET

35. Since the August Mass Picket, there has not been any further incidents of note. Individuals have continued to picket, generally on Tuesdays, Wednesdays, and Thursdays, with numbers remaining roughly the same.
36. In paragraph 87(B) and (C) of Johnson 1, Ms Johnson explained that a Health & Safety Notice was put up at the Lumley Street Depot and sent to Mr Sweeting. Following the events on 19 August 2025 (as explained further above), we decided to update the Health & Safety Notice to explain that approaching or standing close to a refuse collection vehicle, or blocking the driver’s vision whilst attempting to exit or enter a site, with the effect that the vehicle is unable to proceed safely, in Veolia’s view, would be considered to be blocking or obstructing that vehicle, which may amount to a breach of the Injunction Order. I arranged for copies of the updated Health & Safety Notice to be put up at each of the sites marked ‘X’ on Plans 1-5 of the Injunction Order. This was completed on 10 October 2025. I include in my exhibit a copy of the Health & Safety Notice for each site [DAF1/32-35].

37. Recently, one of our employees who is a member of Unite and was on strike returned to work. As explained in paragraph 42(F) of Sophie Garraty's witness statement ("Garraty 1"), Unite has recently notified Veolia that the strike action will be discontinuous, with workers striking one week and working the next.

SECTION F: CONTINUING THREAT OF DIRECT ACTION AND THE STRIKE

38. The Injunction has, in general, been effective. I believe that if no extension were granted there would be a real and imminent threat of unlawful direct action being undertaken by the Defendants just as it did before the Injunction was granted. This is evidenced by their conduct since the Injunction was granted, as set out above in Section E, as well as their public statements which suggest an intention to continue and intensify their activities until the union dispute is resolved.
39. Indeed, far from announcing that they would refrain from targeting the Sites going forward, certain individuals have made comments to the opposite effect. At the July Mass Picket, a number of individuals gave speeches outside the Lumley Street Depot in support of Unite. In a YouTube video posted by DonkeyDave269, Mr Diviney gave a speech outside the Lumley Street Depot, which can be seen at 39:00 - 40:40 in the video **[DAF1/36]**.⁶
40. During his speech, Mr Diviney read from the transcript of the hearing on 13 June 2025: *"I would like to read you a part of the trial transcript... Mrs Justice Stacey said [using a voice to impersonate Mrs Justice Stacey] "comparisons with Birmingham are absolutely absurd". He also read out Veolia's counsel's response, which was that "My ladyship, at this stage that is probably right. But the concern is about escalation". Mr Diviney, continuing to impersonate Mrs Justice Stacey, read out the response: "Escalation? But when have you ever known a union recognition dispute to*

⁶ <https://www.youtube.com/watch?v=HBYblkrenX0> [accessed 12 September 2025] **[DAF1/36]**.

escalate?” When have you ever known a recognition dispute to escalate?”.

41. Mr Diviney then said (emphasis added): “*This looks like an escalation to me, this looks like an escalation. ... And I'd just like to say to Veolia, as we enter now the 11th month of this dispute, you better not let us enter the 12th month. This is fair warning. We're putting you on notice. If you think that this was a mass picket today, you ought to see what happens when we get to the year mark. Sort it out*”. This is a clear and deliberate threat by Mr Diviney of further escalation if the underlying dispute is not resolved by the 12-month mark, which it has not been. This statement was followed by the August Mass Picket, where there was a clear escalation in the actions of protesters. For the first time since the Injunction was granted, RCVs were prevented from leaving the Lumley Street Depot for a substantial period of time (two hours).
42. Further, the underlying inter-union dispute between Unite and GMB has not been resolved. Since June 2025, there has not been any material progress made and I refer to paragraph 44 of Garraty 1 for further detail on this. Accordingly, the threat of further direct action is continuing.
43. As explained in paragraph 42(D) of Garraty 1, on 15 September 2025, a new ballot by Unite members at the Lumley Street Depot approved the continuation of strike action. This approval to continue to strike action is in turn likely to result in continued direct action. As explained in paragraphs 42(E) to (F) of Garraty 1, Unite provided a fresh notice of continuous strike action to Veolia UK on 17 September 2025, but then on 9 October 2025 Unite notified Veolia UK that from 10 November 2025, the strike action would be discontinuous. Unite published an article on its website on 16 October 2025 announcing new strike dates on a one week on, one week off basis, describing it as a “*new tactic designed to disrupt Veolia’s use of agency staff in strike-breaking roles.*” [DAF1/37-38].
44. Therefore, the continuing threat set out above makes the extension of the Injunction not only justified but also necessary for Veolia to continue to

operate their waste collection services in Sheffield.

SECTION G: HARM OF THE DIRECT ACTION AND IMPACT OF THE INJUNCTION ORDER

45. The incidents of direct action are causing fatigue, and having a morale impact, due to the actions, behaviours and words that are directed towards our staff and colleagues. Whilst we are having to utilise overtime this will have a downstream impact in terms of effectiveness, reliance and reliability of colleagues who regularly volunteer for overtime.
46. On 19 August 2025, the day of the August Mass Picket at the Lumley Street Depot, Veolia's operations were severely disrupted as a direct result of the actions of protesters. The protesters blocked the exit from the depot for a significant period of time, which meant that our crews were unable to leave the site and begin their scheduled rounds as planned.
47. I have reviewed the operational data for that day [DAF1/39-44]. Out of a total of 64,035 scheduled collections, 55,552 were completed. This meant that 8,483 bins were not collected on their scheduled day. Our completion rate dropped to just under 87%, which is a significant reduction compared to our usual performance. On a typical day without protest activity, we would expect to complete over 99% of scheduled collections, and the number of dropped bins would usually be in the low hundreds or even zero.
48. In my exhibit I include operational data showing the number of dropped bins on the days that Mr Diviney (and others) protested at the private property line at the Lumley Street Depot between 17 June 2025 and 3 July 2025 (as explained in paragraphs 17, 18 and 24 of Garraty 1) [DAF1/39-44]. I also include operational data on two sample weeks following the Injunction Order on days where was no direct action (in the weeks commencing 21 July 2025 and 25 August 2025). Not including the days where there has been direct action, when comparing the operational data prior to the Injunction Order (as set out in paragraph 33 of the second witness statement of Elizabeth Johnson dated 10 June 2025) and after the

Injunction Order was obtained, the data suggests that, overall, there has been a decrease in the number of dropped bins on the days after the Injunction Order was granted [DAF1/39-44]. There are some outliers in the data on 17 June 2025 and 29 August 2025. I understand from my colleagues that on these days the number of dropped bins was affected by staff shortages due to holidays and sickness, a shutdown of the ERF facility and major traffic issues at the Tinsley Park Road site because of roadworks on Broughton Lane.

SECTION H: IDENTIFYING THE DEFENDANTS

49. The Claimants instructed Subrosa, a leading provider of security and investigations consultancy, to monitor protest activity at the Lumley Street Depot and other sites, and to help identify those who may have engaged in direct action. As a result of this, we have been able to identify some individuals, such as Mr Diviney and Mr Tice, but the majority remain unknown to me.

50. As explained in paragraph 29 of Mr Allen's third witness statement, the Claimants have sent letters to Mr Diviney and Mr Tice regarding their conduct at the August Mass Picket.

SECTION I: DUTY OF FULL AND FRANK DISCLOSURE

51. S&S has advised me of the need to provide full and frank disclosure in this application and at all stages of the process. In the preparation of this statement I have sought to comply with this duty.

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.



Signed

Full name

Dean Anthony Ford

Position or Office held

Regional Director at Veolia ES (UK) Limited

Dated

22 October 2025