

Witness Name : James Harrison

Statement No : Third

Exhibits: JH19-JH21

Dated : 19 March 2021

Witness Statement of James Harrison

I, James Harrison, will say as follows:-

1. I am the Director for the North London Network which is one of the four gas networks operated by Cadent Gas Limited ("Cadent"). I have held this position since April 2019.
2. I have previously made two witness statements to the Metropolitan Police Service in relation to the Grenfell Tower ("the Tower") fire on 14 June 2017. I provided my consent to those witness statements being shared with the Grenfell Tower Public Inquiry ("the Inquiry"). I have also made two statements to the Inquiry [CAD00002985 and CAD00003019].

Background to Cadent

3. I provide background information about Cadent at paragraphs 3 to 9 of my first statement to the Inquiry, CAD00002985. By way of reminder, prior to 1 October 2016, National Grid Gas plc ("NGG") owned and operated four of the eight UK gas distribution networks. By an agreement dated 30 September 2016 ("the Agreement"), all assets and liabilities (as defined) relating to NGG's gas distribution business were transferred to a new company, National Grid Gas Distribution Limited. On 1 May 2017, National Grid Gas Distribution Limited changed its name to Cadent Gas Limited.
4. Prior to my appointment as Network Director, I held the position of North London Emergency Response and Repair ("ER&R") Head of Operations from 1 April 2017. I therefore make this statement from my own knowledge as of that date, and analysis of

historic documents prior to my appointment as Head of Operations, and prior to the Agreement.

5. When I prepared my first statement for the Inquiry, the report of the Inquiry gas expert, Rodney Hancox (“Mr Hancox”), dated 1 October 2019 (the “Hancox Report”), had not yet been disclosed to all Core Participants. Having had the opportunity to consider the Hancox Report, Cadent has submitted proposed lines of questions in respect of this evidence. The purpose of this statement is to contribute further to Cadent’s evidence to the Inquiry, particularly given the passage of time since my first statement, and specifically to provide evidence in respect of the proposed recommendations made in the Hancox Report. The issues I deal with in this statement are:
- a. Cadent’s process for carrying out surveys and inspections of its assets on high-rise multi-occupancy buildings (“MOBs”);
 - b. pipeline isolation valves (“PIVs”); recommendations in the Hancox Report in relation to PIVs and replacing/decommissioning risers pre-dating 1972;
 - c. observations from site visit to the Tower; and
 - d. Construction (Design and Management) Regulations 2015 (“CDM Regulations 2015”).

Inspection processes

6. In my first statement to the Inquiry (CAD00002985 at paragraphs 12 to 15) I provided evidence about the supply of gas into the Tower. I explained that the Tower originally had two supplies of gas (a 10" steel service and a 4" steel service) and between October 2016 and June 2017, a new 90mm Polyethylene / 3" steel service pipe and 2" steel gas riser system was installed in the Tower.
7. Historically, gas pipes in almost all high-rise MOB's were installed during the building's construction. Risers (vertical gas pipes) for transporting gas into MOB's are typically made of steel and designed to have a very long operational life. In Cadent's experience, the primary cause for such assets needing to be repaired or replaced before the end of their expected life cycle is accelerated corrosion due to local environmental factors such as water leaks or ingress or vandalism. To manage the

risk associated with these factors, gas distribution companies like Cadent operate a pro-active rolling survey programme of their assets in high-rise buildings and take appropriate action based on the outcome of those surveys. (I deal with this in more detail below). In addition, and as applies to any and all suspected gas escapes, anyone, including customers living in these buildings, can call the National Gas Emergency Service that Cadent operates on behalf of the industry if there is a suspected escape and a trained operative will attend. (Attendance is within two hours for any suspected controlled escapes (i.e. where the gas emergency control valve for the premises has been turned off and the smell of gas has gone) and within one hour for a reported uncontrolled gas escape (all other cases)).

8. In my first statement to the Inquiry (CAD00002985), I provided evidence about Cadent's rolling survey and inspection process for high-rise MOBs. In summary, Cadent surveys its assets in high-rise MOBs every 1, 5 or 10 years, depending upon their score from the previous survey. The default survey frequency is 10 years recognising the robust and long life nature of these assets. The survey of each high-rise building generates a score. Cadent refers to this internally as a "risk score" but, more accurately, it is a priority score that is used by Cadent to allocate a priority status to any action required in relation to a particular asset, including the date of the next survey. The score is determined by the condition of the main riser components, including supply pipe, riser and lateral.
9. The methodology for calculating this priority score was developed by DNV-GL, who are independent experts in risk management and quality assurance with specialist experience in the gas sector. The approach, methodology and associated risk modelling and operation of the model are periodically reviewed, with the most recent review (relating to coding) having taken place in 2018.
10. Cadent's risk based approach to managing its assets in high-rise MOBs ensures compliance with the current applicable legislation and regulations, including specifically Cadent's overarching duties under the Health and Safety at Work etc Act 1974 ("HSWA") to ensure, so far as is reasonably practicable, that Cadent does not expose third parties to risks to their health or safety and its duties under Regulation 13 of the Pipeline Safety Regulations 1996 ("PSR") to ensure that its pipelines are maintained

in an efficient state, in efficient working order and in good repair. Cadent's approach to managing these assets is also subject to detailed review and scrutiny by the Health and Safety Executive ("HSE").

Access to multi-occupancy buildings

11. In describing the process of carrying out survey work and any required remedial action, I referred in my first statement to the difficulties Cadent can experience gaining access to MOB's. This can often involve liaising with multiple stakeholders, including local councils, managing agents, private landlords and occupiers. Having multiple stakeholders means that there is no single point of contact who is responsible for facilitating access to the entire building and/or who can provide information in relation to all parts of the building in order to allow essential gas safety/maintenance/repair work to be carried out. This often proves to be particularly problematic in relation to gaining access to common areas, for example utility rooms or service ducts, in which Cadent's assets often reside, as these are often locked. These access issues inevitably result in delays to the completion of Cadent's surveys and inspections and any further follow up work required to ensure the integrity of the gas assets. From conversations I have had with other utility companies, I understand that these access issues and associated delays are common beyond Cadent.
12. As a gas distribution company, Cadent's statutory rights of entry are governed by the Gas Act 1986 and the Gas and Electricity Boards (Rights of Entry) Act 1954. However, these powers are understandably restricted and this means that we can only force entry in an emergency situation. In all other circumstances, including requiring access to carry out surveys, routine safety-related checks or replacement of gas risers, we cannot enter premises without consent or a warrant.
13. As explained in my first statement (CAD00002985 at paragraphs 37 to 46), Cadent's survey at the Tower in September 2016 recommended a more detailed corrosion assessment (known then as the "LC/33 survey"). Cadent had been unable to gain access to the Tower and, at the time of the fire, the LC/33 survey had not been carried out. This is an example of the access issues referred to above.

Recent reviews of policies and procedures

14. Cadent's policies and procedures are regularly reviewed and have changed since the fire at the Tower in 2017 to try to mitigate against some of the potential issues caused by the access difficulties I have described that we regularly experience with MOBs. I attach as my **Exhibit JH19**, GD/PR/MOB/43 'Work Procedure – Assessment of Corrosion Damage on Steel Pipework Supplying Multi Occupancy Buildings' ("MOB/43") which was issued in April 2018 and supersedes T/PM/LC/33, the LC/33 survey. MOB/43 sets out detailed procedures for carrying out corrosion assessments, how to carry out and record necessary calculations, and remedial action. The policy sets out clear criteria for the different categories of 'Moderate', 'Severe' and 'Extreme' corrosion and detailed procedures to determine the right categorisation.
15. The procedure for conducting our rolling survey inspections which was in place at the time of the fire, T/PM/LC/21, has also been superseded in recent years and I attach as my **Exhibit JH20**, GD/PM/MOB/2 'Management Procedure for the Inspection, Maintenance, Monitoring and Management of Supplies to Multi Occupancy Buildings' which was published in December 2018 ("MOB/2").
16. In order to ensure that data from surveys is recorded and stored appropriately, Cadent has introduced a software application, or an App, which is used by the engineers to record the information in real time, ensuring greater accuracy. Progress is tracked and reported monthly on a "Dashboard", which I and my network managers access to ensure that any resultant actions from the routine surveys (e.g. follow up corrosion surveys) are progressed to completion as required.
17. If a survey has not been completed within the timescale prescribed in our procedures, we take action to drive completion of any outstanding tasks as soon as possible, including using statutory powers to obtain warrants where appropriate. However, Cadent considers the regime for gaining access could be improved, which I comment on further below.

Government reform

18. Following the fire at the Tower the Government asked Dame Judith Hackitt to carry out an independent review of building regulations and fire safety. Cadent has contributed

to the discussions around the reform of the Building Regulatory System and endorsed Dame Judith's recommendation for a Building Duty Holder. Cadent continues to contribute to the discussions around the draft Building Safety Bill which takes forward the recommendations for reform set out by Dame Judith. The draft Building Safety Bill refers to an "Accountable Person" who would be the duty holder during a building's occupation.

19. Given the challenging nature of working in and around MOB's, Cadent strongly supports the need for a single party who has clear over-arching responsibility and the ability to make decisions in relation to the building or at least co-ordinate their being made. An identifiable party would ensure a single point of contact for gaining access to the MOB in order to carry out important safety checks and any necessary work, to include access to communal areas, any locked areas and individual dwellings. Without an identifiable party, the extended delays and real difficulties faced in identifying/contacting relevant individuals and accessing MOB's will continue to be experienced by utility companies who need access to this category of building. The option of using warrants is not the most direct or efficient route and Cadent believes that a duty of cooperation between duty-holders under the building safety regime and the gas safety regime will strengthen the effectiveness of the frameworks in place to better protect residents.
20. Cadent would also support the creation of an identifiable party who, in addition to facilitating access as set out above, would be: accountable for the holding of records and the provision of information as to the structure and use of the building; co-ordinating works between residents and organisations undertaking work, facilitating inspections of gas installations, collating and disseminating information to all residents in a co-ordinated way, providing details of the way in which the building is used and operates, for example its fire and safety strategy; responsible for the whole life design of the building; and who would be responsible for ensuring that PIVs do not become inaccessible as a result of building, resurfacing or landscaping work around the building as detailed further below.

PIVs

21. Under Regulation 13 of the PSR, Cadent is under an obligation to ensure *“that a pipeline is maintained in an efficient state, in efficient working order and in good repair.”* As I explained in my first statement to the Inquiry, valves are designed to be maintenance free.
22. The HSE has published detailed guidance¹ on the PSR. Paragraphs 60 and 61 relate specifically to Regulation 13 and state:

“The operator needs to consider maintenance and inspection requirements for the pipeline. Examination and monitoring of the pipeline are part of routine maintenance. The operator needs to consider both how and when the pipeline should be surveyed and examined to validate and maintain it in a safe condition.

23. Cadent fulfils its duty under Regulation 13 by carrying out periodic surveys of its PIVs as an integral part of its rolling building survey process. When inspecting the PIVs, the operator will investigate whether the valve is operational by checking that the valve cover is identifiable and remains accessible. The operator will also ensure that the PIV position is marked on Cadent's mapping system. Improvements in the recording of valve location within Cadent's mapping systems have been made since 2017 and this has been recognised by the HSE. Of course, if follow up work is identified as part of the periodic surveys, further work will be carried out. By way of example, if Cadent identifies that a PIV has been covered over, Cadent would carry out work to uncover the PIV to ensure that it is visible and can be accessed. The approach is as envisaged by the PSR guidance and has been discussed with, and noted by, the HSE.

24. In the Hancox Report, Mr Hancox concludes that it is possible that the valve chambers for two of the PIVs at the Tower were covered over when the landscaping work was carried out. That is to say that the PIVs had been “lost” rather than never installed [RHX00000012, para 158]. Cadent agrees that it is likely that the PIVs had been built over and were therefore inaccessible on the 14 June 2017 (although this did not impede isolation of the gas supply, which was achieved by other means). I explained in my first statement to the Inquiry that it is a common and wrongful occurrence for PIVs to be covered over or otherwise rendered inaccessible by building owners or contractors undertaking work on their behalf. This occurs without liaison or notification to the relevant gas distribution network operators. This is why Cadent would support a recommendation that a building owner or identifiable party should have an ongoing obligation for ensuring that PIVs do not become inaccessible as a result of building, resurfacing or landscaping work around the building.

25. In recognition of this common occurrence, Cadent's rolling building surveys require Cadent to state whether PIVs can be visually identified at the premises surveyed. As these surveys take place every 1, 5 or 10 years, it is Cadent's view that it is important that there is also an overarching obligation on building owners or an identifiable party to ensure that PIVs are not built or covered over. The Building Safety Bill provides the framework for this obligation.

Proposed recommendation

26. In the Hancox Report, Mr Hancox considers that the Inquiry “*should recommend the HSE mandate each Gas Transporter to carry out a 3 yearly PIV accessibility inspection programme and progress on that inspection programme should be reported upon in the 3 yearly report.*” [RHX00000012, para 472]. Cadent would support a recommendation from the Inquiry designed to address the problems caused by the wrongful building over of PIVs. However, Cadent is concerned that the recommendation currently proposed could still lead to PIVs being inaccessible for a long period of time. This is in part because the recommendation does not take account of the survey process already in place.

27. In addition, Cadent considers that the most effective approach is for emphasis to be placed on preventing PIVs being covered over in the first place. This would best be

achieved by the creation of an identifiable party who would be responsible for ensuring that PIVs do not become inaccessible as a result of building, resurfacing or landscaping work around the building. This is consistent with the approach proposed by the Hackitt Review and the role of the “Accountable Person” in the draft Building Safety Bill.

28. Cadent recognises the benefit of engaging with stakeholders and in recognition that the Building Safety Bill will have to complete its passage through Parliament before coming into force, Cadent has proactively taken action in the interim. For example, Cadent has written to all high-rise MOBs building owners in its networks to communicate the purpose of the PIVs (including providing images of the PIV cover so that it can be easily identified) and of the need to keep PIVs accessible. Cadent also now has a Memorandum of Understanding with some of the large building owners in relation to PIVs which sets out a framework for co-operation between Cadent and building owners to facilitate the inspection and maintenance of gas infrastructure serving MOBs, and specifically requires the building owner to ensure that all PIVs remain accessible. The draft Building Safety Bill formalises this framework that will require a joined up approach between gas transporter and other stakeholders which Cadent has actively sought and now welcomes.
29. With regard to the proposed three yearly inspection regime, this does not appear to be premised on a risk based methodology. Therefore, while Cadent agrees that it is appropriate to continue to inspect PIVs, it considers that this is most appropriately undertaken on the existing risk based basis aligned with our rolling building survey programme i.e. every 1, 5 or 10 years. This, combined with the creation of an identifiable party for each high-rise building, and the joined up approach between gas transporter and other stakeholders provided for in the draft Building Safety Bill, should address the industry-wide issues described in relation to PIVs.

Proposed recommendation for the replacement / decommissioning programme

30. In the Hancox Report, Mr Hancox has proposed a recommendation for the “*replacement / decommissioning programme for internal riser and laterals that are not compliant with the Gas Safety Regulations 1972.*” (“GSR72”) [RHX00000012, para 469]. Cadent is fully committed to ensuring the safety of its customers in MOB. We

do not, however, support this recommendation as we do not believe it is ultimately in the best interest of those customers for the following reasons, which I explain in more detail below:

- a. There is already an effective and proportionate regime in place to manage the risks associated with gas infrastructure in MOBs, which has been recently reviewed by the HSE, including in the period after the fire at the Tower;
- b. In addition to being disproportionate and unnecessary, the recommended approach would be hugely disruptive for customers, resulting in many having their supply interrupted, in some cases, for lengthy periods of time;
- c. The likely cost associated with the recommendation is in excess of £170 million, which would be borne by customers through the regulatory regime; and
- d. It results in timing and workforce issues, which cannot be addressed without further driving up cost.

Proportionate approach

31. As I explain above, Cadent's risers are long life, robust assets. So far as I and my colleagues are aware, there has never been an incident (e.g. an explosion or fire causing loss of life or injury or significant property damage) caused by the failure of a riser. The risks associated with risers in MOBs are currently managed through an effective combination of: (1) a proactive rolling survey programme, which results where necessary (based on survey results) in the carrying out of repairs and maintenance, refurbishment or replacement; and (2) a reactive fast response National Gas Emergency Service, resulting – where necessary – in repair, refurbishment or replacement. As explained above, the risk based approach to surveys and inspections has been reviewed and scrutinised in detail by independent experts such as DNV-GL and, also, the HSE. These existing measures are proportionate and effective at keeping our 103,590 MOBs with risers (both high-rise and medium-rise) connected, customers safe and ensure compliance with the relevant legislation, including the HSWA and PSR.

32. Mr Hancox recognises in his report [RHX00000012, para 65 and 71], that GSR72 sets out a prescriptive set of rules in relation to the sleeving of service pipes passing through floors and walls, the provision of service valves and corrosion protection. The current PSR replaced the GSR72 and very purposefully moved away from prescriptive rules to require a more risk based approach, which has proven to be effective. Cadent can see no reason to revert back to this more prescriptive approach.
33. As part of Cadent's recent price control review process with Ofgem, Cadent had to set out in detail its proposals for managing its assets in MOB's going forward. Cadent's plan for MOB's was designed following extensive stakeholder engagement, including with our MOB's customers and the HSE, and specifically reflected the changed societal attitude and approach to building safety in light of the fire at the Tower. In relation to replacement and refurbishment of risers, Cadent has adopted a targeted risk based approach. The targeted approach would see Cadent replace, refurbish or decommission 1,727 risers at a cost of £31.25 million over the 5 year price control period, which commences on 1 April 2021.
34. In Cadent's view, the risk based approach to managing risers in MOB's is proportionate, in line with HSE best practice, and is in the best overall interests of those living in MOB's.

The practical effect of Mr Hancox's recommendation

35. In the following paragraphs, I explain how many risers it is likely will have to be replaced or decommissioned if Mr Hancox's recommendation was to be implemented and the practical effect of that.
36. Cadent has circa 17,500 risers in high-rise MOB's, most of which are in its North London network and, of these, approximately 58% (or circa 10,200) are internal. We know from extrapolating our survey data that of the circa 10,200 internal risers, approximately 90% (9,180) of them are installed in buildings constructed prior to 1972. Of those 9,180 pre-1972 building internal risers, approximately 10% (i.e. 920) of them have already been replaced or refurbished during the current price control period, leaving approximately 8,300 internal risers that would potentially fall within Mr Hancox's recommendation.

37. We have then considered how many of the 8,300 risers it is likely we would need to replace or decommission under the requirements of the proposed recommendation and have reached the view that it is highly likely that this would be most of them. This is because GSR72 brought in new and specific requirements in relation to gas installations which did not apply previously. It follows therefore that pre-1972 risers would not be compliant with these provisions which were not retrospective and which, as I have already noted, have since been replaced by a different regime.
38. Customers would also be significantly disrupted by the nature of the work required. Work to replace risers on MOB's is complex and can often take a significant period of time. For example, the physical infrastructure of Cadent's pipes on high-rise MOB's in particular is complicated and often requires more complex solutions and specialist support. There is also physically more pipework required, with risers feeding gas up to the higher floors, and laterals feeding off the risers to supply each floor. As explained above, increased stakeholder engagement with local authorities, management associations, private landlords and occupiers also increases the time required to replace a riser on a high-rise MOB, as does access issues.
39. It is also likely that a number of the pre 1972 risers that would need to be replaced in Cadent's North London network, if the recommendation were to be implemented, would be in protected buildings and/or otherwise require planning permissions, which again causes further delay and disruption for our customers.
40. In relation to the potential cost of complying with the proposed recommendation, if Cadent was able to develop techniques to refurbish some of the risers and replace others, we anticipate the average cost would be in the region of £20,000 per riser. However, if Cadent had to replace them all, the cost could be significantly higher. On that basis, a conservative estimate for the cost of complying with Mr Hancox's recommendation in Cadent's networks alone would be close to £170 million. While Cadent has more high-rise MOB's in its four networks than the other gas distribution network operators (mainly due to the high number of high-rise MOB's in London) there are a further four gas distribution networks who will also have risers that would fall within this recommendation, so the overall cost is likely to be significantly in excess of

£170 million. It is important to remember that the costs of these works would ultimately be borne by the customers of Cadent and the other gas distribution networks through increases in the gas distribution element of their gas bill.

41. In relation to the time required to replace or decommission approximately 8,300 risers, Cadent would estimate this would take approximately 25 years, without a major industry recruitment drive and a large influx of skilled labour. The latter is possible but would again drive up costs for the customer.
42. Taking all of the above into account, Cadent considers that a risk based approach, which is subject to continuing scrutiny and monitoring by the HSE, coupled with proactive and enhanced engagement with building owners as outlined in the draft Building Safety Bill, provides a more appropriate and proportionate solution that is in the best overall interests of those that live and work in high-rise MOB's. It avoids replacing safe, risk assessed, risers at considerable cost and disruption to our customers (which would be the practical impact of the proposed recommendation) and is also consistent with Cadent's commitment to ensuring the safety of its customer.

Site visits to the Tower

43. During his visit to the Tower on 28 February and 30 May 2018, Mr Hancox observed that the riser supplying flats with numbers ending in 5 was ruptured in Flat 5 on the 14th floor, Flat number 115. Mr Hancox does not reach any definitive findings in relation to the cause of this rupture. During our visit to the Tower on 5 September 2018, the Cadent team also observed the rupture in flat 115. Whilst Cadent has not carried out a detailed forensic examination of the joints, and cannot therefore conclude what caused the rupture of the riser at Flat 115, during the site visit, I was struck by the significant structural movement within the Tower. I noted that there had been significant movement in Flat 115, the floor was distorted and the roof propped by an 'acrow prop'. I attach as my **Exhibit JH21** an image of Flat 105 which was directly below Flat 115. The image does not quite do the distortion justice but the ceiling gives a sense of how concaved the floor in Flat 115 was and shows the level of support that was required within the flats. My immediate reaction, as well as that of my expert team, upon seeing the ruptured riser and significant structural movement within the Tower, was that it is reasonably possible that the rupture did not occur on the night of the fire

and that other factors, such as the heat and structural movement, may have contributed to the riser rupturing at a later date. I also note that this was not referred to in the first report of Dr Lane (BLAS0000032) following her visits to the Tower in October and November 2017, which may also suggest the rupture had not occurred at this date.

CDM Regulations 2015

44. My former colleague, Stephen Mason has provided a statement to the Inquiry [CAD00003005] where he addresses the contractual position in relation to work on our gas assets and explains the regulatory framework in which Cadent and its sub-contractor, tRiIO, operated. He has provided a second witness statement in response to a Rule 9 request from the Inquiry where he provides further evidence in relation to Cadent and tRiIO's roles and responsibilities, with particular focus on the parties' roles and responsibilities under the CDM Regulations 2015.
45. As Stephen Mason explains in greater detail, Cadent engaged tRiIO under the Gas Distribution Strategic Partnership Contract to provide riser replacement service across all of its networks. Under the CDM Regulations 2015, Cadent was the "Client" in this arrangement and tRiIO was the appointed "Principal Designer" and "Principal Contractor". In practice, this meant that tRiIO was responsible for the replacement and connection work from receipt of the work, instruction, through to customer engagement, design, ordering materials, construction and post completion data capture.
46. Since 2017 Cadent has reviewed and strengthened its assurance process to ensure that additional controls are put in place to ensure compliance with CDM Regulations 2015. These include improvements in terms of the pre-contractual information provided to the Principal Designer; checks to ensure a Construction Phase Plan is in place prior to setting up the site and checks to be made to ensure that as-built drawings are included in the Health and Safety File. Cadent has also enhanced its assurance process and the Mobs assurance team has developed a robust methodology for gaining assurance that tRiIO is delivering a compliant service.

Conclusion

47. Cadent's review of its policies and procedures has included an overhaul of its LC/21 and LC/33 surveys and the use of technology to make its processes more efficient and effective.
48. Cadent has also supported significant recommendations made by Dame Judith and now forming part of the Draft Building Safety Bill, in particular as they relate to the identification of a single identifiable party as point of contact and access in relation to matters concerning the gas infrastructure in MOB's. Cadent is proactively establishing contact with building owners ahead of this legislation and in order to facilitate this process. It is Cadent's belief that these changes will be an important part of ensuring that problems such as those relating to access and the covering over of PIVs are minimised in the future.
49. Cadent wishes to engage with the recommendations made in Mr Hancox's report and in particular those relating to a replacement/decommissioning riser programme and the accessibility of PIVs. In Cadent's view, these recommendations will be stronger if they are revisited and considered in light of the proposed proactive legislative and other developments outlined above. Cadent believes that the recommendations will also be stronger if they are informed by the further information it is able to provide by drawing on its experience in the gas industry, for example concerning the proposed replacement/decommissioning programme.

Statement of Truth

I believe that the facts stated in this witness statement are true.

Signed: James Harrison

Dated: 19 March 2021