

In the matter of the
Grenfell Tower Public Inquiry

SECOND WITNESS STATEMENT

OF GEOFFREY BLADES

I, Geoffrey Blades of Roundwood Drive, Sherdley Road Industrial Estate, St Helens, WA9 5JD, will say as follows:

Introduction

- 1 I make this statement in my capacity as previous Commercial Projects Manager of CEP Architectural Facades, herein referred to as "CEP" or the "Company". I have now retired from my employment at CEP but I am duly authorised to make this witness statement on behalf of CEP. The contents of this statement are made from my own knowledge except where I indicate that they are matters of information or belief, in which case I will give the source of information or belief. As per the Inquiry's letter of 27 June 2019 (the "Inquiry's Letter"), where I have referred to a document within this statement, the appropriate reference number from the Inquiry's Relativity platform has been cited.
- 2 This witness statement has been drafted with the queries and issues that were highlighted in the Inquiry's Letter in mind, and is supplemental to my witness statement dated 12 November 2018. There are many queries that I am simply not in a position to respond to. This is primarily a result of the limited role that CEP played in the refurbishment of Grenfell Tower. However, if the Inquiry requires any clarification in this regard or otherwise wishes for me to elaborate on any of the

points made in this statement, I am willing to lend my assistance where possible and appropriate.

Roles and responsibilities of individuals at CEP

- 3 I note the request for information about the roles and responsibilities of certain individuals at CEP and their involvement in Grenfell Tower, if any, and outline the information which is to the best of my knowledge as follows.

John Cowley

- 4 John Cowley is Chief Executive Officer of CEP. To my knowledge, he did not have any involvement in the Grenfell Tower refurbishment (the "Refurbishment").

Neil Wilson

- 5 Neil Wilson is General Manager of CEP and was my line manager. He was project manager and production manager for the Company. I was the main day to day contact. Neil was involved in the cladding aspect of the Refurbishment, to the extent that CEP was involved. In terms of the management structure at CEP in St Helens, Neil is in charge overall.

Roy Fewster

- 6 Roy Fewster is the former Managing Director of CEP and is semi-retired. It is my understanding that Roy works two or three days a week and is now a project manager. After CEP was bought by Omnis in December 2013, Roy became Managing Director of the Omnis Exteriors Division. He was involved in the Refurbishment when needed or where his assistance was requested on a specific aspect.

Steve Roberts

- 7 Steve Roberts was glazing estimator and materials scheduler. He was involved in fulfilling the window framing order of the Refurbishment.

Deborah Talbot

- 8 Deborah Talbot was the receptionist and placed orders with the suppliers as required for the Refurbishment.

Peter White

- 9 Peter White was one of the window fabricators in the CEP factory. Peter attended Grenfell Tower with me to do some remedial snagging work on the window frames.

Relationships of CEP with other organisations prior to the Refurbishment

Arconic, and any agent of Arconic

- 10 Arconic supplied material for various other projects which CEP and Arconic had previously completed together.

Harley Facades/ Harley Curtain Wall ("Harley")

- 11 CEP has done a lot of work with Harley over many years. We had worked on projects for both windows and cladding previously referred to in my witness statement dated 24 October 2017.

Leadbitter

- 12 I did not have a relationship with Leadbitter before the Refurbishment and was not aware of them prior to the Refurbishment.

Studio E

- 13 I had not had any previous dealings with Studio E prior to the Refurbishment and was not aware of them prior to this project.

Rydon

- 14 I had previously had discussions with Rydon in respect of the Chalcots Estate within their supply chain.

Any bidder other than Rydon for the Grenfell Tower refurbishment contract

- 15 To the best of my knowledge, I did not have a relationship or dealings with any bidder other than Harley for the refurbishment contract and was not aware that CEP did either.

Parties with whom CEP entered into relationships for the Grenfell Tower refurbishment

16 A list of the parties with whom CEP entered into relationships with for the Refurbishment was set out in my previous witness statement dated 12 November 2018 at Appendix 1, however I attach a further copy at Appendix 1 to this witness statement.

17 I understand that all of the contractual documentation in CEP's possession relating to the Grenfell Tower Refurbishment has been provided to the Inquiry previously.

Understanding of (i) performance and classification, and (ii) pricing and reasons for variations in pricing for rainscreen products prior to the Grenfell Tower incident

KME Proteus HR honeycomb rainscreen panel

18 I never dealt with KME Proteus personally. I was aware of this product but was not aware of its fire performance or classification and I never priced KME's materials. CEP did not have an account with KME and did not use this panel.

Reynobond Duragloss 5000

19 I understand this product is class 0. We priced Harley a m² rate in response to their request for this product. I am not aware of variations to pricing of this product.

Alucobond

20 I understand that Alucobond was class 0. This product was never priced by us in relation to Grenfell Tower.

VM Zinc Quartz Zinc composite polymer panel

21 I do not know what classification this specific product was; I have never used the product or priced it so I am also not aware of the pricing or reasons for any variations in pricing.

Understanding of (i) fire performance and classification; and (ii) pricing and reasons for variations in pricing of types of Reynobond ACM before the fire at Grenfell Tower on 14 June 2017

22 As regards to the Refurbishment, as outlined in my witness statement of 12 November 2018, CEP was never asked or instructed to carry out an assessment of the regulatory and legislative compliance of the exterior of the building. This being said, as outlined above at paragraph 19, CEP understood that the Reynobond panels were classified as class 0 as under the Building Regulations and it was therefore our understanding that they could form part of a safe and compliant structure that was designed by other parties. Further, I believe that panels such as this were used on a large number of buildings and that it was a widely held view within the industry prior to the fire at Grenfell Tower that they complied with the Building Regulations.

Reynobond ACM with a PE Core

23 I understand that this product is class 0 performance. CEP priced a Harley m² rate against their request for this specific product, however I am not aware of any variations to pricing. I understand that Rydon did not want to increase the price and the architects were looking at various colour options, with Harley and Rydon both trying not to increase the cost already tabled. However, CEP did not have any involvement in this process.

Reynobond with an FR core

24 As far as I am aware, this product is class 0 fire performance. We did not price this product because we were not asked to do so. It was not until after the refurbishment that I and CEP became aware that Arconic supply a FR product, Reynobond FR. We were not asked to supply this product for the Refurbishment. We did not price this product because we were not asked to do so. It was not until after the Refurbishment that CEP became aware that Arconic supplied an FR product, namely Reynobond FR.

Reynobond with cores of different colours (for example, translucent or black)

25 As far as I am aware, these are class 0 and I am not aware of any price differences.

Reynobond that is face (riveted) fixed to buildings

26 As far as I am aware, this is class 0 and I am not aware of any price differences.

Understanding of the pricing and reasons for variations in pricing in windows products before the fire at Grenfell Tower on 14 June 2017

Wicona Wiclina systems

27 I understand that this product was in the specification for the Refurbishment which is why it was priced by CEP. There was no reason for variations in pricing.

Schuco AWS/ADS systems

28 This was priced against Leadbitters' enquiry. I believe it was requested by them.

Metal Technology Hi+ systems

29 I understand that the reason for variation in pricing of the Metal Technology Hi+ systems pricing is that alternatives could be submitted and Harleys requested it as an alternative price.

With reference to paragraphs 8-12 of your first statement, did you at any time tell Studio E, Leadbitter, Rydon, Harley or any other party that CEP was not able to advise directly on the specification of products at Grenfell Tower, and that in order to advise, CEP would have to engage MHA?

30 No, in circumstances where CEP was not being requested to advise on the specification of the products, the situation did not arise.

Use of Reynobond 55 on Grenfell Tower

31 I did not discuss or agree with Arconic, Harley or any other party that I or CEP would recommend Reynobond 55 cladding for use on Grenfell Tower.

32 Further and in addition, neither I nor CEP recommended Reynobond 55 cladding for use on Grenfell Tower. I introduced Deborah French of Arconic to Studio E as being the representative of Arconic who could demonstrate their products, however I had no involvement in the discussions.

Pre-contract discussions with Studio E in 2012 and 2013

Your understanding of the cladding and windows products that Studio E had specified or were considering at this stage

- 33 At that stage, I understand that Studio E were considering zinc as a rainscreen option and aluminium windows.

Any discussion between CEP and Studio E at that time as to suitable cladding or window products, including what documents and information CEP provided to Studio E. This is to include (i) email communication (ii) telephone communication and (iii) face-to-face meetings.

- 34 A meeting was arranged where the Arconic Reynobond product was introduced. I attended this meeting with Deborah French of Arconic, Bruce Sounes and Adrian Jess of Studio E, and Grant Sterling of Leadbitter, at Studio E's offices on 16 October 2012. My email of 9 October 2012 to Bruce Sounes (CEP0000000007) confirms the purpose of the meeting was to discuss zinc rainscreen. I believe that the architects did already have some zinc samples from elsewhere or from another source I have noted "Rheinzinc", another zinc manufacturer in my diary entry. The purpose of this meeting was for Deborah to promote Reynobond zinc panels and for me to promote for the cladding and window systems. This was a sales meeting only and the purpose of the meeting was not to discuss the system in detail. Regardless, I understand that the products discussed at this meeting were not subsequently pursued by Studio E.

- 35 The Metal Technologies window specification was sent by email on 22 October 2012 as requested by Studio E (CEP000005309 with attachments CEP000005310, CEP000005311, CEP000005312, CEP000005313). I may have called to check whether it was received, but I do not remember whether I did and would not have made a note of such a call.

- 36 I understand from my email dated 7 November 2012 and Dave Winborne's response dated 8 November 2012 (CEP000005314) that I spoke with Blaine Cagney at Studio E that morning before passing this information on to Dave Winborne at Metal Technology for him to communicate with Studio E directly.

Given that in advance of the meeting of 4 April 2012, you were asked for advice on the specification and pricing of suitable panels, do you maintain that CEP was never asked for advice (paragraph 30 of your first statement)?

- 37 I had been due to meet Studio E at its offices on 4 April 2012, however I was unable to travel down on the 4 April 2012, having been snowed in and instead rearranged to 11 April 2012.
- 38 I met with Bruce Sounes and Markus Keifer of Studio E on site on 11 April 2012 to discuss the job. This was a walk around the site and discussion and following the meeting, I sent samples of Steni cladding to Studio E on 14 May 2012.
- 39 As I could not attend the meeting on 4 April 2012, I was sent documentation by Markus Kiefer, which consisted of photographs of the site and requesting information for the meeting. Markus Kiefer also emailed me asking for my thoughts on the "appropriate cladding systems" and their associated rates for use on Grenfell Tower, in advance of the meeting Studio E had on 9 April 2012 with the client (CEP00048112), by which I presume he means either Kensington and Chelsea Council or the Tenant Management Organisation.
- 40 I responded to Bruce Sounes at Studio E on 5 April 2012 by email (CEP0017839) and provided a series of typical drawings of CEP's standard cladding system. No rates for this system were provided; it was designed by Mark Heywood, a self-employed Designer used by CEP, when a design element is required. I did not consider that this was a request for advice and was merely providing information at this stage. CEP was not ultimately contracted to provide its cladding system. If we had been asked for a full quote, CEP would have sought the assistance of Mark Heywood or another designer to review the design requirements of the system as a whole.
- 41 As set out at paragraph 30 of my first statement, CEP's role was ultimately restricted to fabrication of the panels and windows only. We were not asked to and were not in a position to provide any substantive advice regarding the suitability for their inclusion in the Refurbishment project. I would not have given any advice because we were not aware of a specification. I cannot recall what options were proposed

but if prices were to have been requested, budget rates would have been given based upon historic contracts.

Whether, in your knowledge, any other supplier, fabricator or manufacturer was involved with discussions with Studio E regarding cladding or windows for the refurbishment.

- 42 Yes, I was aware that Studio E were in discussions with other cladding/ panel companies as I understand they had received other zinc products.

Any discussion you had with Studio E regarding the specification of windows at Grenfell Tower. In particular, please set out your knowledge of how it came to be that Metal Technology was introduced as supplier to Grenfell Tower. Please refer to the correspondence set out in your witness statement paragraph 33(b).

- 43 From what I recall, Studio E was considering aluminium windows but no system had been chosen. I suggested Metal Technology and I understand that the Metal Technology representative at the time sent their specification through to Studio E.

In paragraph 33 (c) of your witness statement you refer to documents Leadbitter sent to you on 24 January 2013. These included drawings, envelope calculations and a scope of works. Shortly thereafter, you forwarded these to Deborah French, agent for Arconic. In those circumstances

Did you or CEP know that the proposed refurbishment was for a tower block which was over 18m?

- 44 Yes, CEP and I were aware of these points.

Were there any discussions internally at CEP about what cladding and/or windows products would be suitable for such a building? If so, please outline those discussions.

- 45 It is reasonable to say that this was likely in the general run of business. No minutes would have been taken of these types of discussion, however to the best of my knowledge they would have revolved around the products referred to in the documents sent by Leadbitter prior to quotation.

Did you consider whether there would be any limitation on the products that were recommended and/or supplied for use at Grenfell Tower?

46 No, I did not consider that there would be any limitations regarding the products identified in the documents received from Leadbitter.

Did you provide any information and/or advice on such limitations to any other party, including but not limited to Harley, Rydon, Leadbitter or Studio E?

47 No, I am not aware of any information that was provided in this regard.

Were you aware if Deborah French (and Arconic) knew the building was over 18m and/or that limitations would apply to the products that could be used?

48 I understand that Arconic and Deborah French were fully aware of the building size, given that they had received the relevant documents.

Please set out the details of (i) any discussion between CEP and Arconic as to what panels would be suitable for the Grenfell Tower refurbishment; and (ii) any discussion between CEP and Arconic regarding prices of panels.

49 We did not have discussions with Arconic about suitability of panels other than their ACM and prices were not requested at that point.

With reference to paragraphs 17, 18 and 33(d) of your first statement, on CEP's quotation for Harley in early 2014

In an email from you to Neil Wilson on 8 January 2014, you stated you were proposing to Harley "Reynobond with face-fixed panels". Why did you propose this?

50 I proposed this because in the first instance, Harley requested for us to provide both, however subsequently I cannot recall why it was "face-fixed" in the email.

Please set out the quotations that CEP provided on 21 January 2014 and subsequent revisions.

51 CEP sent two quotations to Harley on 21 January 2014 (CEP000000253). CEP provided Harley with a quote for supply of window frames on 23 September 2014 (CEP0000006641 with attachment CEP0000006642). Between 6-13 March 2015 CEP

sent Harley quotes for ACM panels at Grenfell Tower (6th -CEP000000525, 10th-CEP000000526, 13th -CEP000000527). Further quotes were provided on 8 June 2015 (CEP0000005195) and 6 July 2015 (CEP000000616 with attachment CEP000000617).

As regards the cladding priced in those quotations:

i. *Deborah French's (Arconic's) quotation to you of 15 January 2014 quotes a price for Reynobond 55 4mm. Did CEP understand that price to be for cladding with a core that was PE, FR or another type?*

52 CEP understood that this was to be for a PE core.

ii. *Was CEP's quotation to Harley for Reynobond ACM with a core that was PE, FR or another type?*

53 CEP's quotation to Harley for Reynobond ACM was for a PE core.

iii. *How did CEP arrive at the decision as to what cladding product to quote for and what price would be quoted? Why did CEP only quote for Reynobond ACM?*

54 Harley requested a quote for Reynobond within the specification by Studio E sent to CEP on 6 January 2014 (CEP000000205 with attachments CEP000000206, CEP000000209, CEP000000210, CEP000000211, CEP000000215). Pricing was based upon estimations and then a mark-up applied in line with normal commercial terms.

Please set out how CEP decided which window types to quote for and how CEP arrived at the prices quoted.

55 Wincona were specified and Metal Technology was quoted as an alternative in line with the request from Harley and the specification guidance allowing similar or equal alternatives. Pricing was based upon estimations and then a mark-up applied in line with normal commercial terms.

In 2013 and 2014, Arconic supplied samples of Reynobond products to various parties.
In 2014, Arconic supplied Reynobond materials for the creation of a mock up.

Please set out, a detailed list of all requests for samples and mock-up materials of which you/CEP are aware.

56 This information has been provided in my earlier statement but for ease of reference I will set it out again here. The specification for the mock up was sent to me by Harley in an email of 23 June 2014 (CEP000004329 and CEP000004330). CEP obtained material from Arconic and provided the panels for the mock up.

57 As indicated at paragraph 21, our involvement in the Refurbishment project progressed in June 2014 when we were asked by Harley to fabricate some ACM panels required for a mock-up that they were assembling (CEP000005386 with attachments CEP000005387, CEP000005388). I understand that the purpose of the mock-up was purely for the planner/client to select the colour and finish of the ACM panels. On 25 June 2014, we received detailed drawing for the mock-up which specified Reynobond ACM panels (that are manufactured by Alcoa) and that there was to be "no insulation on mock up" (CEP000004350 with attachment CEP000004351). We were sent Reynobond panels by Alcoa, which CEP fabricated in accordance with the design provided and delivered to the Grenfell site, where I believe the mock-up panel was constructed by Harley.

With regard to each,

i. *was any core type requested? If so what type?*

58 Not that CEP or I were aware of.

ii. *what core types were the samples and mock up materials provided with?*

59 I am not aware of what core types the samples and mock up materials were.

iii. *what fixing method was requested, and what was supplied?*

60 I understand that Harley did the fixing. I cannot recall what method was requested or supplied as I was not involved.

In paragraph 21 of your first statement, you state that the order of 25 June 2014 instructed that there was to be "no insulation on mock up". Please confirm that by

this, you understood there was to be no thermal insulation mounted onto the mock up (such as Celotex RS5000), and not that there was to be no core in the ACM provided.

61 I understand that no insulation was required for the mock up. The core of the ACM was never considered in this regard. Harley informed CEP that the purpose of the mock up was purely for the planner and/or client to select the colour and finish of the ACM panels (CEP000000399).

On 1 August 2014, Deborah French thanked you and Mike Albiston for your “hard work and perseverance in putting Reynobond forward”

Do you agree that you put Reynobond forward?

62 No, I did not put Reynobond forward. I understand that Reynobond was one of the alternatives named in the specification and this was priced at the request of Harley. I introduced Arconic to the project and Studio E and Deborah French were thanking Mark Harris (not Mike Albiston) by email on 1 August 2014 (CEP00052068) for preserving and putting Reynobond forward, not myself. In view of this, I have not commented on the "if so" element of this question, as raised by the Inquiry.

In February 2015, you were sent a specification by Harley for cladding panels, and you obtained a quotation for Reynobond ACM from Arconic. What core was specified? If there were any discussions about the core to be used please set them out.

63 There was no core specified on Harley’s emails and order. To the best of my knowledge the core of the ACM was not discussed.

What did you believe the core of the ACM would be and did this change at any time? Please set out your knowledge of how ACM with PE core came to be installed on Grenfell Tower.

64 At the time of the Refurbishment, I would have believed that the core would be standard Reynobond ACM on the basis that this is the product that was specified. The core would have been PE however we did not discuss this. I am not aware of any changes at any time.

65 I understand that ACM was used, by virtue of Reynobond being specified in the documents and requested by Harley.

At paragraph 20 of your first statement, you state that Deborah French provided Harley (and you) a copy of the BBA Certificate 08/4510 for Reynobond cladding.

Prior to this, were you aware of the BBA certification of Reynobond and in particular its fire performance rating?

66 Yes, I was aware of the certification and by default its fire rating as class 0.

What did you understand "Class 0" to mean and what did you think its significance was?

67 I understood that "Class 0" meant that the product was of limited combustible nature linked to surface spread of flame. I understood that it met the required standards of the building regulations.

As a fabricator of panels, are you aware of the difference that joints (including raw edges, scoring of panels and different fixing techniques) can make to the fire performance of cladding products? Please outline your knowledge of this.

68 I was not aware that joints had any significance in relation to the fire performance of cladding products.

Are you aware of the different testing regimes for cladding including BS 476:6 and :7, and EN13501? Please outline your knowledge of this.

69 Yes, I had limited knowledge of different testing regimes, more so for BS476.

Has your or CEP's understanding of fire performance, testing and certification changed since the fire? Have any of CEP's processes changed? If so, please explain how and why.

70 Yes, our understanding has changed since the fire. CEP has introduced a process whereby more information is required prior to offering a project response. As a business we have moved away from supplying part of a system towards providing our own complete system with design included.


To the extent not covered in your first statement, please briefly outline your involvement with the supply of cladding and windows to the refurbishment after February 2015, and including snagging works.

71 My involvement with the supply of cladding and windows to the refurbishment after February 2015, including snagging works, was limited to a one-off snagging visit in June 2016 with regard to window frames.

Statement of Truth

I confirm that the contents of this statement are true.

I am willing for this statement to form part of the evidence before the Public Inquiry and to be published on the Public Inquiry's website

Signed.....

Date.....16th Aug. 2019.....