



Grenfell Tower Inquiry

Day 107

March 16, 2021

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Tuesday, 16 March 2021

1  
2 (10.00 am)  
3 SIR MARTIN MOORE—BICK: Good morning, everyone. Welcome to  
4 today's hearing. We're going to hear evidence today  
5 from further people who were involved on behalf of the  
6 British Board of Agrément.  
7 The first witness today is Mr Prayer Nkomo, and my  
8 first step is to see whether he is there and can see me  
9 and hear me clearly.  
10 MR PRAYER NKOMO (called)  
11 SIR MARTIN MOORE—BICK: Are you there, Mr Nkomo?  
12 THE WITNESS: Yes, I can hear you clearly.  
13 SIR MARTIN MOORE—BICK: Good morning.  
14 Mr Nkomo, I'm here together with my fellow panel  
15 members, Ms Thouria Istephan and Mr Ali Akbor.  
16 MS ISTEPHAN: Good morning.  
17 THE WITNESS: Good morning.  
18 MR AKBOR: Good morning.  
19 THE WITNESS: Morning.  
20 SIR MARTIN MOORE—BICK: You have already confirmed that you  
21 can see me and hear me clearly.  
22 I think you would like to make the oath; is that  
23 right?  
24 THE WITNESS: Yes.  
25 SIR MARTIN MOORE—BICK: And you should have the words of the

1

1 oath on the screen in front of you. You do?  
2 THE WITNESS: Yes, I do.  
3 SIR MARTIN MOORE—BICK: Do you have a copy of the  
4 New Testament with you?  
5 THE WITNESS: Yes.  
6 SIR MARTIN MOORE—BICK: Could you take the Testament in your  
7 right hand, please, and read the words on the screen.  
8 (Witness sworn)  
9 SIR MARTIN MOORE—BICK: Lovely, thank you very much indeed.  
10 Now, there are one or two things we need to deal  
11 with before we start taking your evidence.  
12 First of all, can you confirm that you're alone in  
13 the room from which you're giving your evidence?  
14 THE WITNESS: Yes, I can confirm that.  
15 SIR MARTIN MOORE—BICK: Thank you very much.  
16 Can you confirm that you have no documents or other  
17 materials with you?  
18 THE WITNESS: That's correct.  
19 SIR MARTIN MOORE—BICK: Thank you.  
20 Finally, can you confirm that your mobile phone is  
21 in another room and that you don't have any other  
22 electronic device with you which is capable of receiving  
23 messages?  
24 THE WITNESS: That's correct.  
25 SIR MARTIN MOORE—BICK: Lovely. Thank you very much indeed.

2

1 I hope we shall not have problems with sound or  
2 vision, but if we do, we'll probably take a short break  
3 while the technical support people sort them out, so we  
4 will see how we get on.  
5 We're planning to have a short break part—way  
6 through the morning and another one this afternoon. It  
7 will probably come around 11.15. But if you feel that  
8 you need a break at any time in addition, will you just  
9 indicate that and we'll do our best to accommodate you.  
10 THE WITNESS: Okay. Thank you.  
11 SIR MARTIN MOORE—BICK: All right? Good.  
12 Is there anything you would like to raise with me or  
13 any questions you have before you begin?  
14 THE WITNESS: No, I don't have, thank you.  
15 SIR MARTIN MOORE—BICK: All right. Thank you very much.  
16 Well, now I'm going to invite Ms Hynes to put some  
17 questions to you.  
18 Good morning, Ms Hynes.  
19 Questions from COUNSEL TO THE INQUIRY  
20 MS HYNES: Thank you, sir, good morning, and good morning to  
21 members of the panel.  
22 Good morning, Mr Nkomo. Can you hear me and can you  
23 see me?  
24 A. Yes, I can.  
25 Q. Good.

3

1 Thank you for attending this public inquiry to give  
2 your evidence. We're very grateful to you.  
3 If you have any difficulties in understanding my  
4 questions or if you need me to repeat a question, please  
5 do just let me know.  
6 Also, can I please ask you to keep your voice up so  
7 that the transcriber can hear you, and so that she can  
8 record all of your answers, please don't nod or shake  
9 your head, please answer "yes" or "no".  
10 Is that all all right?  
11 A. That's fine, yes.  
12 Q. Can we go to your witness statement, which is  
13 {BBA00010783}. This was made on 30 December 2019.  
14 Can we go to page 24, please. Do you see there at  
15 the bottom that there is a statement of truth?  
16 A. Yes.  
17 Q. Can you confirm that that's your signature under it?  
18 A. It is, yes.  
19 Q. Have you read this statement recently?  
20 A. Yes.  
21 Q. Can you confirm that the contents of this statement are  
22 true?  
23 A. Yes, they are, except one thing that I sent to our  
24 solicitors, because I think one of the dates I quoted  
25 was a 2017 date which should have been a 2014 date.

4

1 Q. Do you remember approximately which paragraph that would  
2 be in?  
3 A. I can't quite remember. It's earlier in the statement  
4 itself.  
5 Q. Which review would that have been or which episode would  
6 that have been related to?  
7 A. The S153.  
8 Q. Give me a moment. I will see if I can turn that up.  
9 (Pause)  
10 We will come back to that and we will let you  
11 clarify that.  
12 A. Okay.  
13 Q. Have you discussed your statement or your evidence with  
14 anybody here today?  
15 A. No.  
16 Q. When you were working at the BBA, there was an entity  
17 known as Alcoa that later became Arconic. Today I'm  
18 going to refer to that entity as Arconic. Do you know  
19 who I mean?  
20 A. Yes, I do.  
21 Q. Today I'll be mostly talking about Arconic's  
22 BBA certificate for Reynobond architecture wall  
23 cladding, which was first issued on 14 January 2008.  
24 Can we go to that briefly at {BBA00000047}. I just  
25 wanted to show you this certificate so we're both clear

5

1 on which one I mean. Do you recognise that?  
2 A. Yes, I do.  
3 Q. Thank you.  
4 Can we go back to your witness statement, please,  
5 {BBA00010783/2}. At paragraph 4 you say:  
6 "I graduated with a degree in Civil Engineering in  
7 1998 and have worked for consulting engineering firms as  
8 a design engineer between 1999 and 2009 ..."  
9 Then you set out a number of tasks that you did in  
10 that role.  
11 Now, I understand from that that you worked for  
12 around ten years as a design engineer; is that right?  
13 A. Correct.  
14 Q. That was specifically as a civil engineer?  
15 A. Civil structural engineer.  
16 Q. Structural engineer?  
17 A. Yeah.  
18 Q. Can you tell us who you worked for?  
19 A. I started off with a company in Botswana called  
20 MT & Associates Consulting Engineers, and then I moved  
21 on to Dublin in Ireland, and I worked for a company  
22 called Niall Fitzsimons Consulting Engineers, and then  
23 I moved on to another consultancy in Ireland as well,  
24 that was called ACS Consulting Engineers.  
25 Q. I see.

6

1 In your career as a design engineer, did you do any  
2 overcladding projects?  
3 A. No.  
4 Q. So you weren't directly involved in any design of any  
5 façade or cladding structure?  
6 A. No.  
7 Q. Now, still on your witness statement, at paragraph 5 you  
8 tell us that you became a chartered engineer. What did  
9 you do to attain that title?  
10 A. I had to submit a report, basically, of my experience  
11 and qualifications, and following that I had to do  
12 an interview where I was questioned on my experience and  
13 the work that I'd carried out to be ascertained whether  
14 I met the requirements to be confirmed as a chartered  
15 engineer.  
16 Q. I see. And you joined the BBA in November 2010; is that  
17 right?  
18 A. Correct.  
19 Q. Did you have, prior to joining the BBA, any training on  
20 cladding or cladding products?  
21 A. No.  
22 Q. So you have joined the BBA from 1 November, and that was  
23 in the role of project manager; is that right?  
24 A. Correct.  
25 Q. What division or section were you in?

7

1 A. In the engineering department.  
2 Q. Did you at that time report to a team manager?  
3 A. When I — I reported to the head of approvals, there  
4 were no team managers at the time.  
5 Q. And who was that?  
6 A. That was Brian Chamberlain.  
7 Q. I see.  
8 In that role, did you assess products for new  
9 certification and review existing certificates?  
10 A. It was both.  
11 Q. In that role, were you looking at cladding products?  
12 A. Cladding, yes, as well I started looking into cladding.  
13 Q. That was when you started working in cladding. Did you  
14 look at other products as well?  
15 A. Yes, I did.  
16 Q. I see. What proportion of products were cladding  
17 products?  
18 A. I can't remember what it was.  
19 Q. Now, you tell us in your witness statement — I don't  
20 think we need to go back to it — that, as a project  
21 manager for those years, you were not involved in the  
22 review of the Reynobond certificate in 2011; is that  
23 right?  
24 A. As far as I recall, that's correct, yes.  
25 Q. That was done by another project manager, Alpheo Mlotha;

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1 is that right?  
 2 A. Correct.  
 3 Q. Would you have expected to have known what he was doing  
 4 on that review?  
 5 A. I might have, but I don't remember, because he was my  
 6 mentor at the time, so —  
 7 Q. I see.  
 8 A. Yeah. I can't remember whether he discussed the review  
 9 with me or not. I wouldn't remember that.  
 10 Q. Was that an official mentor or was that an ad hoc  
 11 sort of process?  
 12 A. It was official. He was assigned to help me settle into  
 13 the BBA when I joined.  
 14 Q. I see. And what sorts of things would you go to your  
 15 mentor about?  
 16 A. (Inaudible) on how — because obviously I was new to the  
 17 job, in terms of learning how to do the job, learning  
 18 how to assess products, learning how to do reviews.  
 19 Q. So do I understand correctly, it was mostly learning the  
 20 procedures and processes of the BBA?  
 21 A. Not only procedures and processes, but also from  
 22 a technical point.  
 23 Q. I see. So you would learn from Mr Mlotha about  
 24 technical —  
 25 A. Among others, yes.

9

1 Q. I see. I see.  
 2 From I think around 5 January, you became a team  
 3 manager; is that right?  
 4 A. Correct.  
 5 Q. Was that a promotion?  
 6 A. Yes, it was, yes. The position became available,  
 7 I applied and I got it.  
 8 Q. You said at the time you started there weren't any team  
 9 managers; was this a role that was created?  
 10 A. Yes.  
 11 Q. Can you tell us why it was created?  
 12 A. The BBA was growing at the time, and what the company  
 13 wanted to do is to group products into teams, so there's  
 14 one team that focuses on certain product areas and other  
 15 teams focusing on others.  
 16 Q. I see.  
 17 Ms Amoroso's told us about a cladding team. Is it  
 18 right, have I surmised correctly, that your team was the  
 19 cladding team?  
 20 A. Correct.  
 21 Q. So when you became team manager, was that when the  
 22 cladding team was formed or was there a cladding team  
 23 previously?  
 24 A. It wasn't called cladding. There was a team, so  
 25 everyone who worked in cladding was under that team. So

10

1 when I became team manager, then cladding as a product  
 2 area was separated from the other team that was covering  
 3 cladding and building systems.  
 4 Q. Just so I'm clear, that happened in early January 2015?  
 5 A. When I became team manager, yes.  
 6 Q. I see. And am I right that there was effectively  
 7 an interstitial layer of management inserted into the  
 8 management structure when you became team manager?  
 9 A. Could you repeat that, sorry?  
 10 Q. Yes, so there was a new layer of management inserted  
 11 into the structure, the management structure, and you  
 12 took up that management role?  
 13 A. The layer was already there, the structure of team  
 14 managers, it's just that one team was separated into  
 15 two.  
 16 Q. I see. Well, I'm glad I clarified that because I hadn't  
 17 quite understood, so thank you.  
 18 As team manager, did you still report to  
 19 Brian Chamberlain?  
 20 A. Yes.  
 21 Q. I see. And did Ms Valentina Amoroso report to you in  
 22 the new cladding team?  
 23 A. That's correct.  
 24 Q. I see. Does that mean that the focus of your team was  
 25 on cladding exclusively?

11

1 A. Not exclusively, there were other products that we were  
 2 covering as well.  
 3 Q. I see. Were they related products, or just other  
 4 miscellaneous products?  
 5 A. Building systems and other wall-related products.  
 6 Q. I see.  
 7 A. Yes.  
 8 Q. And from 1 October 2016 you took on the role of  
 9 technical expert; is that right?  
 10 A. Correct.  
 11 Q. And you held that role at the same time as being team  
 12 manager —  
 13 A. Yes.  
 14 Q. — is that right? Yes.  
 15 Do I understand correctly that your expertise was  
 16 external wall cladding?  
 17 A. Correct.  
 18 Q. Did the BBA always have an external wall cladding  
 19 expert?  
 20 A. I believe I was the first one, in terms of the title,  
 21 because those titles were not there before, but there  
 22 were people who were experienced in cladding, even more  
 23 than myself, previously to that.  
 24 Q. I see.  
 25 You say there were people experienced in cladding

12

1 even more than yourself; would you say — and you may  
 2 not be able to comment — that there were people with  
 3 cladding experience in your time when you were project  
 4 manager?  
 5 A. Yes.  
 6 Q. And would you be able to comment about before then? So  
 7 when you came to the BBA, there were people perhaps from  
 8 as early as 2007/2008 who had been there who were very  
 9 experienced in cladding?  
 10 A. I don't know before I joined, but after I joined, there  
 11 were people who were very experienced in cladding.  
 12 Q. When you were project manager, who would you go to for  
 13 questions about cladding?  
 14 A. It was either, as I said, Alpheo Mlotha, or there was  
 15 Cary Randall, who was one of the most senior in  
 16 cladding. There was another gentleman as well called  
 17 Zoltan, and I would go to Brian Chamberlain as well.  
 18 Q. And that's Cary Randall who went to UKAS eventually; is  
 19 that right?  
 20 A. Correct, yes.  
 21 Q. I see.  
 22 Now, I've understood that from March 2019 you  
 23 stopped being team manager; is that right?  
 24 A. Correct.  
 25 Q. And you focused exclusively on your technical expert

13

1 role; have I got that right?  
 2 A. Correct.  
 3 Q. And you're still employed at the BBA in that role?  
 4 A. I am, yes.  
 5 Q. Can we go to your statement at page 2, that's  
 6 {BBA00010783/2}, at paragraph 6. Can you look at the  
 7 last sentence there, four lines from the bottom:  
 8 "In my role I am responsible for providing technical  
 9 guidance and support to Project Managers, mentoring,  
 10 checking and authorising assessment contracts, checking  
 11 and authorising assessment work and draft Certificates."  
 12 Mr Nkomo, is that the description of your role as  
 13 technical expert or is that of another role?  
 14 A. That's part of my description, yes, as a technical  
 15 expert. Correct.  
 16 Q. I see.  
 17 Staying with your witness statement, can we go to  
 18 page 24 {BBA00010783/24}, please. You will see that in  
 19 bold there is a question number 32, and it says:  
 20 "Has your understanding of fire performance testing,  
 21 certification, or compliance with relevant regulations  
 22 and guidance changed since the issue of the certificate  
 23 in 2008? If so, please explain in what ways it has  
 24 changed and why."  
 25 You say at paragraph 98:

14

1 "Note that I am still with the BBA."  
 2 At paragraph 99, I just want to look at that first  
 3 line:  
 4 "My understanding of fire has not changed."  
 5 Do you mean by that that since the beginning of your  
 6 time at the BBA, you had a good understanding of  
 7 reaction to fire testing of products?  
 8 A. I wouldn't call it good, because there is a technical  
 9 excellence team at the BBA that generally handles  
 10 fire-related matters, so I wouldn't say I'm good in fire  
 11 myself.  
 12 Q. I see, but did you have a, shall I say, working  
 13 knowledge of —  
 14 A. A general idea of fire-related matters.  
 15 Q. I see.  
 16 Would you have understood and do you understand the  
 17 difference between the two regimes, the BS 476 suite of  
 18 tests, two of which can lead to the designation class 0,  
 19 and the European tests that lead to the EN 13501  
 20 classification? Is that something you would appreciate?  
 21 A. No.  
 22 Q. I see.  
 23 Do we take from your statement that, from the  
 24 beginning of your time at the BBA, you had a good  
 25 knowledge of Approved Document B on fire safety?

15

1 A. I wouldn't say a good knowledge, a general knowledge, as  
 2 I said.  
 3 Q. I see.  
 4 Do you have a general knowledge about the necessary  
 5 fire performance of materials before they can be used on  
 6 different parts of buildings?  
 7 A. In general terms, as far as the reaction to fire itself  
 8 and what it might mean in terms of any possible — any  
 9 applicable restrictions.  
 10 Q. I see.  
 11 At the BBA, have you had any training on reaction to  
 12 fire testing?  
 13 A. We have been given — yes, over time in-house seminars  
 14 have taken place by the technical excellence team.  
 15 Q. I see. Can you give us an approximate timeframe of when  
 16 you might have had those?  
 17 A. I can't quite recall. There have been a few of them  
 18 over my ten years at the BBA, I can't remember exactly.  
 19 Q. I see. Were these seminars mandatory?  
 20 A. An invitation would be sent out to say there is this  
 21 seminar and you would register to attend. I don't know  
 22 whether they were mandatory or not.  
 23 Q. I see.  
 24 A. Yeah.  
 25 Q. Did you have any training or guidance on Approved

16

1 Document B on fire safety?  
 2 A. I think some of the training, the in-house training, was  
 3 in relation to approved document.  
 4 Q. In relation to Approved Document B specifically?  
 5 A. Yeah, correct.  
 6 Q. I see.  
 7 When you started at the BBA, would you have had any  
 8 training on the approved documents?  
 9 A. After I joined the BBA or before?  
 10 Q. Well, when you started, as part of your initial days at  
 11 the BBA.  
 12 A. No.  
 13 Q. I see.  
 14 Valentina Amoroso told us yesterday that she spent  
 15 some time reading them and asking questions. Was it  
 16 a similar sort of process for you?  
 17 A. I can't quite say. When you join, there is an induction  
 18 programme generally that's set up, and that's not going  
 19 into the specific technical details of the various  
 20 topics, it's more of settling into the organisation.  
 21 And then, as you started the work, then it's kind of you  
 22 learn as you do the work, either asking colleagues or if  
 23 there are any internal seminars like the ones  
 24 I mentioned that are held by the BBA.  
 25 Q. I see.

17

1 Did you ever have occasion to ask for advice or  
 2 assistance on fire matters from external bodies like the  
 3 BRE or Warrington, who you may know as Exova?  
 4 A. Personally, myself?  
 5 Q. Yes.  
 6 A. Not directly. I have in other projects where there is  
 7 a system that's set up that if we had any fire-related  
 8 queries, we would complete a form, then that's sent to  
 9 Warrington by way of an individual who is the contact  
 10 person here at the BBA.  
 11 Q. So specifically Warrington, who in Warrington would you  
 12 ask, do you know?  
 13 A. I don't know, because it wasn't going directly from me.  
 14 You had to go through — there's a BBA project manager  
 15 that we used to go through.  
 16 Q. I see. What sort of period was this?  
 17 A. I can't quite remember the period.  
 18 Q. Was it when you were a project manager or when you were  
 19 a team manager?  
 20 A. I can't quite remember for sure. It could have been  
 21 either.  
 22 Q. I see.  
 23 Was it on routine questions, or was it just when the  
 24 project manager would come across a problem, a difficult  
 25 question, that you would go to Warrington?

18

1 A. Yeah, it would have been on difficult questions that  
 2 come up or things that were not clear.  
 3 Q. I see. So am I right that, just as a day-to-day, you  
 4 wouldn't go and check any statements about fire  
 5 performance just routinely; it would be if something  
 6 exceptional or difficult came up? Is that right?  
 7 A. You mean go and check externally?  
 8 Q. Yes, check externally, yes.  
 9 A. No, generally if it's routine questions, you would check  
 10 internally first, either with individuals within the  
 11 company who are more experienced with fire matters or  
 12 the technical excellence team which handles such matters  
 13 mainly.  
 14 Q. So tell me a little bit more about the internal process.  
 15 Who in the BBA would be the fire person to go to in your  
 16 time as project manager or team manager?  
 17 A. There is a Jon Denyer and John Albon who were in the  
 18 technical excellence team, and —  
 19 Q. I see. This technical excellence team, has that always  
 20 existed or is that a more recent —  
 21 A. No, it — I can't remember exactly when, but I think it  
 22 would have come into place in the last few years.  
 23 Q. In the last few years?  
 24 A. Yes.  
 25 Q. So in the time you were, say, project manager, there

19

1 wasn't perhaps a technical excellence team, but am  
 2 I right that there would have been someone to ask about  
 3 fire?  
 4 A. Yes, those two individuals who were still within the  
 5 company, people would go and ask those individuals.  
 6 Q. I see. Would it be routine to always check fire  
 7 performance statements in a certificate with Jon Denyer  
 8 or John Albon?  
 9 A. It wasn't always routine.  
 10 Q. When would you go to Jon Denyer or John Albon?  
 11 A. At the moment it's — we do go to them quite a lot, but  
 12 in times gone by, normally you would follow the wording  
 13 that was there for any reaction to fire that any product  
 14 achieved.  
 15 Q. I see. So you wouldn't necessarily go to Jon Denyer or  
 16 John Albon in times gone by, and can I take that as  
 17 being between 2010 and, say, 2015? Would that be fair?  
 18 A. Not quite, as I said, unless it was a general question,  
 19 normally project managers would either ask one another  
 20 or, you know, the head of approvals, who was  
 21 Brian Chamberlain at the time, you'd ask him, because at  
 22 the end of the day he would go through your technical  
 23 file once we have finished the job in order to give  
 24 comments on that.  
 25 Q. I see. What I'm getting at is: was it a necessary step

20

1 in the process to check fire statements with any one of  
 2 these people, Jon Denyer, John Albon or  
 3 Brian Chamberlain, or was it something that came up from  
 4 time to time if the project manager felt he or she  
 5 needed to ask?  
 6 A. It wasn't a necessary step in terms of during the  
 7 assessment, but once you have completed the assessment  
 8 itself, and we have drafted your certificate and  
 9 prepared your evaluation report which contains basically  
 10 the — in detail what you have done under that work,  
 11 those two documents will then be passed on to  
 12 Brian Chamberlain, who then checked. So if it wasn't  
 13 directly to John Albon or Jon Denyer, it will go through  
 14 Brian Chamberlain at the end.  
 15 Q. I see. There wasn't really a process by which — say  
 16 you're assessing a new product, and you write your  
 17 statement, I think you said you might take statements  
 18 from a previous certificate. There wasn't a process by  
 19 which you would take the written document, the written  
 20 certificate, alongside the test data to Mr Chamberlain  
 21 or Mr Albon, Mr Chamberlain would just get the final  
 22 certificate and look at that; is that right?  
 23 A. Yes, it's correct.  
 24 Q. I understand.  
 25 I just want to ask one more question about the

21

1 arrangement with Warrington: did the BBA pay Warrington  
 2 a fee to answer questions about fire?  
 3 A. I don't know that detail.  
 4 Q. I understand.  
 5 Can you help us with another matter that came up  
 6 from Ms Amoroso's evidence: she said yesterday that she  
 7 would have expected the CSTB to notify her if there had  
 8 been changes to certified products, and she talked about  
 9 a mutual agreement between the BBA and the CSTB; to your  
 10 knowledge, was there any mutual agreement between the  
 11 BBA and the CSTB about the sharing of information  
 12 relevant, for example, to the Reynobond product?  
 13 A. I don't know if there was a contractual agreement.  
 14 There is basically an appreciation that notified bodies  
 15 can depend on the work that was done by another body for  
 16 their own certification. So in terms of contractual  
 17 basis, I don't know.  
 18 Q. What I'm asking about is if there was an ongoing  
 19 agreement that — say we've taken the CSTB data to do  
 20 a confirmation certificate; was there an agreement or  
 21 an arrangement or even an understanding that the CSTB  
 22 would continue to provide updates to that data to the  
 23 BBA?  
 24 A. As far as I remember, I think we would have to  
 25 specifically ask the CSTB for those details.

22

1 Q. I see.  
 2 What about the sharing of information in relation to  
 3 surveillance of the factory processes which the CSTB was  
 4 carrying out? We understand that they were happening or  
 5 they were supposed to be happening from the issue of the  
 6 certificate until around 2015, when the BBA set up their  
 7 own surveillance. What would your expectations of the  
 8 CSTB be then?  
 9 A. It would be for them to provide the BBA then with  
 10 reports of those surveillance visits. Now, the  
 11 mechanism of that, I'm not sure how it actually went in  
 12 terms of who actually requested the reports to be sent  
 13 on a regular basis.  
 14 Q. I see. And would you — I think you may have somewhat  
 15 answered the question — have expected those to be sent  
 16 on a regular basis or by exception, so if something went  
 17 wrong you would get that report?  
 18 A. If they were requested I would have expected them on  
 19 a regular basis.  
 20 Q. I just want to clarify your evidence: what about test  
 21 evidence data or data more generally? So, for example,  
 22 if the CSTB did additional testing on, say, the  
 23 Reynobond product, would you expect them to notify the  
 24 BBA about that additional testing and those results?  
 25 A. I don't know if there is such an arrangement we have

23

1 with them.  
 2 Q. I see.  
 3 Was the CSTB ever made aware of the contents of the  
 4 BBA certificate, to your knowledge?  
 5 A. I don't know.  
 6 Q. Are you aware of any arrangement with the CSTB that's  
 7 been formalised in writing?  
 8 A. Other than the one when the certificate itself was  
 9 originally assessed, the project manager who carried out  
 10 that assessment, I know he did say to the CSTB to be  
 11 able to notify the BBA of any major non-conformities  
 12 that they were to pick up during their surveillance.  
 13 That's as far as I know in terms of formal —  
 14 Q. I see, and no other interbody contract or arrangement?  
 15 A. I'm not aware of that.  
 16 Q. I see.  
 17 I want to ask you some general questions about  
 18 reviews and the review processes.  
 19 You have told us that, as project manager, you would  
 20 have conducted assessments for new products and reviews  
 21 for existing products. Can you help me with how many  
 22 certificates you would be working on at any one time?  
 23 A. I think it varies from project manager to project  
 24 manager. I think once you have been at the BBA for at  
 25 least two years or so, I think you generally find people

24

1 with anything between 10 and 20 projects. Some of them  
 2 may be new assessments, some of them may be reviews,  
 3 some of them may be re—issues of existing certificates.  
 4 Q. I see. And beginners, perhaps, new people would have  
 5 fewer?  
 6 A. Yes, correct.  
 7 Q. I see.  
 8 How many project managers reported to you when you  
 9 were team manager?  
 10 A. I can't quite remember, but I think it would have been  
 11 between five and six, thereabouts, I think.  
 12 Q. I see.  
 13 Can we please go to your witness statement at page 5  
 14 {BBA00010783/5}, paragraph 12. You set out the steps  
 15 there for conducting a review. You say:  
 16 "Steps for conducting a Review are as follows:  
 17 "a) Requesting information from the Certificate  
 18 holder.  
 19 "b) Reviewing the contents of the Certificate to  
 20 establish if the information in it is still up to  
 21 date/relevant e.g. if the version of standards, building  
 22 regulations etc. quoted have been updated since the  
 23 Certificate was last issued.  
 24 "c) Reviewing the Certificate holder's product  
 25 literature to establish there are no contradictions with

25

1 the contents of the Certificate.  
 2 "d) Reviewing the factory surveillance reports  
 3 history for the previous three years to establish that  
 4 any matters raised were addressed and confirming the QP  
 5 [by which I think you mean quality plan] is up to date  
 6 and agreed.  
 7 "e) Completing a Review checklist which details the  
 8 findings of the process and preparing a Review letter  
 9 summarising the key findings. The Review checklist  
 10 templates list the areas to be covered in the Review.  
 11 A Review letter to the Certificate holder would be  
 12 prepared once the checklist is completed."  
 13 You tell us below that that the sign—off process  
 14 changed after you became the team manager.  
 15 Can we now just go over the page to page 6 of your  
 16 witness statement {BBA00010783/6}, paragraph 14. You  
 17 say there:  
 18 "Once a Project Manager (PM) completes the Review,  
 19 they would pass the Review checklist and letter to their  
 20 Team Manager to check and sign off before the letter is  
 21 sent to the Certificate holder. Where the Review  
 22 identifies serious issues resulting in recommendation of  
 23 limited validity, suspension or withdrawal of  
 24 Certificate, the letter is approved and signed off by  
 25 the Operations Manager."

26

1 Just to get your evidence completely right, is that  
 2 a description, those two paragraphs we've just looked  
 3 at, of how you as team manager would have operated  
 4 a review?  
 5 A. In general, yes, though in 14 there would be a lot of  
 6 discussions between a team manager and their project  
 7 manager during the course of the work itself, and then  
 8 at the end, then I would go through the final report and  
 9 the letter to comment and sign it off.  
 10 Q. I see. In fact, I think we see that at page 12  
 11 {BBA00010783/12} at paragraph 41, certainly the end of  
 12 that process. You say:  
 13 "As Team Manager I managed the PM responsible for  
 14 the Review, oversaw the signing off of the Review at the  
 15 end of the work after checking it and the work."  
 16 You say there that you checked the work. You mean  
 17 by that you checked the project manager's work; is that  
 18 right?  
 19 A. That's correct, yes.  
 20 Q. You have told us about discussions with the project  
 21 manager, would that be part of your checking their work?  
 22 A. Not necessarily me going to them, it's a question of  
 23 mainly if they have any questions or queries, they would  
 24 come to myself for discussions.  
 25 Q. So the project manager was to raise questions with you

27

1 and that is how you'd come to know of any issues or  
 2 details that you should be aware of?  
 3 A. That's correct, yes. And also the other thing that we  
 4 would have, we'd have one—to—one meetings with the  
 5 project managers, just to go through the list of jobs  
 6 that they have, just to maintain progress and see if  
 7 there were any issues.  
 8 Q. I see.  
 9 In terms of checking, would you go over everything  
 10 they did, would you spot check, would you focus on  
 11 specific areas? Can you give us a feel for what you  
 12 would do with these checks?  
 13 A. It's a combination of all that you have mentioned.  
 14 Sometimes I would spot check. It depends on the  
 15 contents of the review checklist itself. So you kind of  
 16 get a feel as you work with different people, some —  
 17 with the experience I had on certain aspects, if I read  
 18 something and it rang a bell, sometimes I would think to  
 19 say, "Oh, let me go and actually check the document  
 20 behind that", whereas if it's clearly laid out, I would  
 21 read the report and leave it at that.  
 22 Q. I see. So the review checklist was the key document in  
 23 your checking work?  
 24 A. That's correct.  
 25 Q. I see.

28



1 Would you say you were not checking literally  
 2 everything that a project manager was doing?  
 3 A. No, we are not required to check everything.  
 4 Q. Of course. That would mean that you would be relying on  
 5 the project manager to get everything right and be  
 6 thorough; is that right?  
 7 A. That's correct, yes.  
 8 Q. And that would mean that you would rely on the BBA  
 9 processes being robust and being able to get all of the  
 10 right information out of the certificate holder; do you  
 11 agree with that?  
 12 A. Yes, I would agree with that. As I said, also with the  
 13 experience I would have on other aspects, sometimes  
 14 I would just decide to spot check some things  
 15 specifically, if something rings a bell.  
 16 Q. I see.  
 17 When you had a new recruit to the BBA, would you  
 18 check his or her or their work more thoroughly than  
 19 someone with a lot of experience?  
 20 A. Generally that's what I tend to do.  
 21 Q. I see.  
 22 Now I would like to ask about the Reynobond  
 23 certificate itself, and in particular the review that  
 24 was started in 2013. For your reference, the project  
 25 number is S153729. So we will see that number coming up

29

1 on documents, so you'll know that that's related to that  
 2 project.  
 3 We can see on the documents that this review was  
 4 commenced in October 2013 by Maria Barbeito, and at the  
 5 time she would have been a project manager; is that  
 6 right?  
 7 A. Correct.  
 8 Q. I think I've got this right, that she was a person in  
 9 your team at your level; is that about right?  
 10 A. Yes.  
 11 Q. You were both project managers at the same time?  
 12 A. That's correct.  
 13 Q. Could we please go to {BBA00008090}. We're going to see  
 14 the letter that Maria Barbeito sent to Arconic dated  
 15 8 October 2013. In fact, it was sent the next day, but  
 16 it's all around the same time.  
 17 Can we now go to the second page {BBA00008090/2},  
 18 please, at the bottom of the page. We see a header  
 19 "Submission of data", and it says this:  
 20 "It is necessary for the BBA to be supplied with the  
 21 following information in order to carry out the Review  
 22 of your Agrément Certificate 08/4510:  
 23 "1. It is our normal practice to conduct a written  
 24 survey of users of the product. Could you therefore  
 25 please provide details of a minimum of ten major

30

1 installers and ten major users of Stonelite Cladding  
 2 Panels who can be contacted to establish the  
 3 practicability of installation and performance in use."  
 4 Going down to the second paragraph:  
 5 "2. Written confirmation that there have been no  
 6 changes in the design, specification, context of use or  
 7 other details that would invalidate the Certificate.  
 8 Alternatively, please specify any changes.  
 9 "3. Regarding factory production control please  
 10 supply full details of any changes to:  
 11 "(a) Raw materials.  
 12 "(b) The manufacturing process.  
 13 "(c) Quality Control procedure.  
 14 "4. Copies of your current UK technical literature  
 15 and installation instructions relating to the product.  
 16 "5. A list of customer complaints (if any) relating  
 17 to product quality for the projects in the UK in the  
 18 last three years and the action taken to resolve them.  
 19 "6. An estimate of the annual volume of production  
 20 of the product for the UK market since the issue of the  
 21 certificate.  
 22 "7. Recent copies of typical production/quality  
 23 control records for the manufacture of the product."  
 24 Mr Nkomo, was that the standard form of the request  
 25 at that time?

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1 A. I'm not quite sure if it was the standard form. I think  
 2 some — just looking at it, I think some of the  
 3 information may be slightly different in other reviews.  
 4 But in general, yes, that's the sort of information that  
 5 would be asked.  
 6 Q. Was this a template or was this perhaps copied from  
 7 another letter?  
 8 A. I'm not aware that we had a template, as it were.  
 9 I think oftentimes what we would do is use the list that  
 10 we had already compiled in other jobs, like in this case  
 11 it's a review, so if you're doing another review, you  
 12 would refer to the — probably the most recent review  
 13 that you have done.  
 14 Q. I see.  
 15 A. (inaudible).  
 16 Q. I'm sorry, Mr Nkomo.  
 17 A. Go ahead, please.  
 18 Q. Can we just go up to the page before, page 2  
 19 {BBA00008090/2}. At the bottom in that paragraph 1, do  
 20 you see in the second line that Maria Barbeito's  
 21 referenced "Stonelite Cladding Panels"? That does not  
 22 appear to be the product that was being reviewed at the  
 23 time. Does that seem to be the case to you?  
 24 A. Yes, that was not the product —  
 25 Q. So that's possibly a copy and paste error?

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1 A. Yes. I think this — as I explained, we would normally  
 2 go in terms of the information required, go to the list  
 3 that you have compiled for another job, so it appears  
 4 here that it was copied from another job, but the name  
 5 of the product not changed.  
 6 Q. I see. I'm not quite sure how to put this to you,  
 7 Mr Nkomo, but is that a little sloppy?  
 8 A. It's an editing error, clearly.  
 9 Q. I see.  
 10 Now, we know that Maria Barbeito tried to contact  
 11 Arconic, and we know by this letter dated 8 October, and  
 12 we know, because we saw yesterday the correspondence  
 13 from Ms Barbeito to various people in Arconic, that she  
 14 chased on email on 21 October 2013, 29 November 2013,  
 15 13 December 2013, 10 February 2014, 28 February 2014,  
 16 7 May 2014, and from time to time it appears that she  
 17 was in contact with Claude Wehrle on the telephone. She  
 18 also managed to arrange a factory surveillance visit for  
 19 10 September, but we know she did not get the  
 20 information she requested in her October letter 2013.  
 21 Although you were project manager at the time, would  
 22 you have known that there had been any difficulties in  
 23 getting a response from Arconic while Maria Barbeito was  
 24 chasing them?  
 25 A. Unless she discussed it with me, I wouldn't have known.

33

1 Q. I see. Do I understand that you don't have any  
 2 independent recollection of that at the time?  
 3 A. No, I don't.  
 4 Q. I see.  
 5 We know that Valentina Amoroso took over this review  
 6 in December 2014, and that was in fact before you became  
 7 team manager, wasn't it?  
 8 A. Correct.  
 9 Q. And she was still quite new at the BBA at the time,  
 10 wasn't she?  
 11 A. Yes.  
 12 Q. Can we now go to {BBA00010550}. This will be an email  
 13 chain between you and Valentina Amoroso.  
 14 Can we go to the very bottom of page 3  
 15 {BBA00010550/3}. We see at the very bottom of the  
 16 screen right now that there is an email from  
 17 Valentina Amoroso on 1 December 2014, and if we scroll  
 18 over to page 4 {BBA00010550/4}, we can see that it's to  
 19 you, and the subject is "Info cladding panels". She  
 20 says:  
 21 "Hi Prayer,  
 22 "I am working on one of Maria's jobs and you have  
 23 been advised as 'the expert' about cladding systems.  
 24 I need to ask a couple of things. Can you tell me what  
 25 is a suitable time for you?"

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1 Can we scroll back up to the middle of page 3  
 2 {BBA00010550/3}, email dated 1 December, timed at 14.32.  
 3 Thank you. We can see your reply:  
 4 "Hi Valentina,  
 5 "Don't believe everything you hear Valentina!!!!  
 6 I'm no expert at all. I would be interested to know who  
 7 said I'm 'the expert'. It is putting pressure on me  
 8 because if I'm unable to answer your questions/help you,  
 9 I'd feel embarrassed.... You can come at 3pm."  
 10 Now, did you have some expertise in cladding at this  
 11 time?  
 12 A. I'd been at the BBA at that time for four years,  
 13 I believe, so I did have some expertise in cladding,  
 14 yes.  
 15 Q. You had at least enough for someone in your team to be  
 16 able to ask you about cladding; is that something you  
 17 can agree with?  
 18 A. Yes, I would say so, but obviously I wouldn't class  
 19 myself as an expert as it was, you know, characterised  
 20 in that email.  
 21 Q. I see.  
 22 Is it right people would come to you with questions  
 23 about cladding and you would help them if you could?  
 24 Have I characterised that fairly?  
 25 A. Yeah. That's correct.

35

1 Q. Can we continue with this chain and go to the bottom of  
 2 page 2 {BBA00010550/2}. There is an email timed at  
 3 16.35. It's from Valentina Amoroso, it's on the same  
 4 day, and she says:  
 5 "Hi Prayer,  
 6 "This is the contact person for Alcoa Architectural  
 7 Products SAS (Job S1/53729)."  
 8 She gives the details for Claude Wehrle, and then  
 9 she says at the bottom:  
 10 "Sorry for leaving you in the position of contacting  
 11 them... [sad face]  
 12 "Thank you very much.  
 13 "Cheers."  
 14 Might we guess from that that you did speak with  
 15 Ms Amoroso at some time that afternoon?  
 16 A. I assume so, yes.  
 17 Q. It looks from this that you were asked to contact  
 18 Claude Wehrle at Arconic; is that right?  
 19 A. That's correct.  
 20 Q. Were you being asked to intervene?  
 21 A. I can't quite remember what exactly it was in connection  
 22 with.  
 23 Q. I see. So you're not sure if you were told something  
 24 about needing to intervene, that there needed to be  
 25 perhaps someone more senior contacting Arconic, making

36

1 that initial contact?

2 A. I can't quite tell just from that email what exactly

3 I was contacting them for.

4 Q. Okay. Well, perhaps the next document will help.

5 Before we go there, did you know Arconic before this

6 time? Had you worked on any other Arconic products,

7 for example Reynolux?

8 A. I don't recall having worked on any of their products up

9 to that time, no, I don't recall.

10 Q. I see.

11 Can we please go to Claude Wehrle's exhibits,

12 part 18. That's {MET00053158\_P18/4}, please. We can

13 see there is an email from you, it's dated

14 2 December 2014, and you say:

15 "Dear Claude Wehrle,

16 "Thank you for taking my call earlier this

17 afternoon. I note the following issues we discussed."

18 I'm going to skip the first paragraph and go

19 straight to the second paragraph. You say:

20 "Outstanding information for the review of

21 BBA certificate 08/4510 under contract S1/53729 — my

22 colleague Maria Barbeito had asked for the information

23 a number of times. You indicated you provided

24 information to the inspector who visited the factory and

25 therefore did not respond to Maria's emails as you

37

1 considered Maria's request addressed. Unfortunately the

2 information provided to the inspectors during their

3 factory audits is different to the one required for the

4 Review of the certificate as requested by Maria. Thank

5 you that you have agreed to send this information if we

6 can send you the list again. My colleague Valentina

7 Amoroso (who took over the Review job S1/53729 after

8 Maria left the BBA) will send you an email with

9 a reminder of what information we require. This will

10 enable her to complete the review of your certificate

11 08/4510."

12 Now, we see at the bottom that you have signed that

13 off as project manager. So even though you were project

14 manager, you were making this initial contact with

15 Arconic; is that right?

16 A. That's correct.

17 Q. Could that be on the basis that you were more

18 experienced?

19 A. I'm not — it might be, but I'm not sure.

20 Q. Okay.

21 We can see that you refer to Maria Barbeito as

22 having asked for information a number of times. At this

23 point, do you think you understood that there had been

24 difficulties in contacting and getting information from

25 Arconic?

38

1 A. In as far as the fact that Maria had asked for the

2 information and she still — multiple times but hadn't

3 received their response, that's how I understood it.

4 Q. You say multiple times; did you have sight of the volume

5 of requests that had been made?

6 A. Judging by the statement at paragraph number 2, I think

7 I would have had an idea that Maria had tried before.

8 Because I think the one thing, when Maria left and at

9 the time that Valentina was given the job, some

10 questions were being directed at me in the interim

11 period, just to help. So I imagine I would have had

12 sight of the fact that Maria had been chasing them but

13 hadn't managed to get any information from them.

14 Q. I see. Let me just understand that correctly. So

15 Maria Barbeito left, say, in October or November, and

16 Valentina Amoroso joined the team in around

17 November/December, I think her evidence was November,

18 but you were sort of covering Maria's projects until

19 Valentina picked them up? Have I understood that —

20 A. Not covering, I don't recall covering, but I think by

21 default either the team manager would direct people to

22 me in the meantime. Being I'd been at the BBA for

23 four years, I imagine I had a little bit more knowledge

24 than others at the time.

25 Q. I see.

39

1 A. But it wasn't an official, you know, bridge before a new

2 manager took over.

3 Q. I see. In that time, perhaps, is it your evidence that

4 you became aware of the volume of correspondence that

5 had passed?

6 A. Not in their entirety. The fact that Maria had chased

7 them and hadn't gotten the information.

8 Q. I see.

9 A. Yes.

10 Q. Now, in that document we saw, you say "the information

11 provided to the inspectors during their factory audits

12 is different to the one required for the Review of the

13 certificate as requested by Maria". You can see that

14 paragraph 2, four lines down, starting with

15 "Unfortunately". Do you see that?

16 A. Yes.

17 Q. By that, do you mean that the documents that have not

18 been provided, the information that is missing, is that

19 information that was in Maria Barbeito's letter of

20 8 October 2013?

21 A. I think that's what I would have been implying in

22 this —

23 Q. And — sorry, please carry on, Mr Nkomo.

24 A. No, I think that's what I would have been implying, that

25 the information as detailed in Maria's letter was still

40

1 outstanding compared to what they had claimed they had  
 2 given the inspector.  
 3 Q. I see.  
 4 Am I right that you would not expect an inspector to  
 5 collect that sort of information on a surveillance  
 6 visit?  
 7 A. That's correct.  
 8 Q. Am I right that it was your view that the certificate  
 9 holder had to send those documents to the BBA, that it  
 10 was a necessary part of the review?  
 11 A. That's correct, yes.  
 12 Q. Can we please go to {BBA00008098}. This is an email  
 13 from Valentina Amoroso on 2 December 2014. We can see  
 14 that it's timed at 16.17, so it follows the email that  
 15 we just saw. We can see that it's written to  
 16 Claude Wehrle, and she says:  
 17 "My name is Valentina Amoroso and I have been  
 18 designated as the new Project Manager responsible for  
 19 coordinating the review of your BBA Certificate 08/4510.  
 20 "Following on from your conversation with my  
 21 colleague Prayer Nkomo, please find the list of  
 22 information required to complete the Review Report:  
 23 "1. Details of a minimum of ten major installers  
 24 and ten major users of Stonelite Cladding Panels in the  
 25 UK who can be contacted to establish the practicability

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1 of installation and performance in use."  
 2 Going down now to the second paragraph:  
 3 "Written confirmation that there have been no  
 4 changes in the design, specification, context of use or  
 5 other details that would invalidate the Certificate.  
 6 Alternatively, please specify any changes."  
 7 Paragraph 3:  
 8 "Regarding factory production control please supply  
 9 full details of any changes to:  
 10 "(a) Raw materials.  
 11 "(b) The manufacturing process.  
 12 "(c) Quality Control procedure."  
 13 And we see 4, 5, 6 and 7 thereunder.  
 14 That, I think, is very similar to the letter that  
 15 Maria Barbeito wrote some 14 months previously. Is that  
 16 right?  
 17 A. It looks similar, yes.  
 18 Q. In fact, we can see in paragraph 1 the Stonelite  
 19 cladding panels have been cited again, so that looks  
 20 like perhaps another copy and paste error. Is that your  
 21 understanding?  
 22 A. I wouldn't say a copy and paste error, because the  
 23 letter had already gone out first from Maria, so what  
 24 Valentina was doing effectively was resending the letter  
 25 that contained the information. I wouldn't have

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1 expected her to proofread unless someone had known that  
 2 there was an error in the wording.  
 3 Q. I see.  
 4 Did it strike you as unusual to have to send out  
 5 more or less the same letter to Arconic?  
 6 A. No, it didn't, because I think from my understanding at  
 7 the time, the information hadn't been provided, so we  
 8 were reminding them of what Maria had asked them, which  
 9 they hadn't sent.  
 10 Q. What I'm — sorry, please continue.  
 11 A. No, I'm saying it would have been — I would have  
 12 expected us to resend the exact letter to remind them of  
 13 the information that hadn't been sent.  
 14 Q. Yes. What I'm asking, really, is: was it unusual to  
 15 have to resend a letter to a certificate holder setting  
 16 out once again everything that you asked for 14 months  
 17 earlier?  
 18 A. If you're talking in terms of the timeframe, the  
 19 14-month period, it may have been unusual. But if  
 20 you're asking sending the exact letter, it wasn't  
 21 unusual, because we wanted them to know exactly what we  
 22 had asked for before.  
 23 Q. Was it common to have such a lack of engagement by  
 24 a certificate holder during a review?  
 25 A. It wasn't normal.

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1 Q. It was not normal?  
 2 A. It wasn't. There would be delays in many jobs, but  
 3 a delay of this length did appear quite long.  
 4 Q. I see. Was that significant to you at the time?  
 5 A. I just took it as a delay. Whether significant or not,  
 6 I didn't think in those terms.  
 7 Q. Okay.  
 8 Can we look at paragraph 2 and paragraph 3. We can  
 9 see that they're very different requests. It seems to  
 10 me that paragraph 3 is focused on production and  
 11 quality, whereas paragraph 2 is about making sure that  
 12 nothing else has changed. Have I understood that  
 13 distinction correctly?  
 14 A. Yes, that seems to be the case.  
 15 Q. And it seems to me, from your previous email to  
 16 Claude Wehrle, that getting information from paragraph 3  
 17 and information from paragraph 2 was not negotiable.  
 18 Have I understood that right?  
 19 A. I wouldn't say not negotiable.  
 20 Q. It was an essential part of the review?  
 21 A. All the information ultimately is essential to the  
 22 review, because it all adds up to helping us come to  
 23 a conclusion on the suitability of the product, so  
 24 I wouldn't single that one out to say it's the only one  
 25 that was essential.

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1 Q. But it was one of the ones that was essential?  
 2 A. Yes.  
 3 Q. And it was part of BBA process to have what's said there  
 4 in paragraph 2, was it?  
 5 A. Yes, it would have been part of the process. As I said  
 6 earlier, the list does look slightly different to others  
 7 that I've seen on other jobs. But in general, yes, it  
 8 is a list that would have been considered essential,  
 9 among one of the essential aspects in terms of 2 and 3.  
 10 Q. Now, we know that Valentina picked up the communication  
 11 with Arconic at this point, and we know that she got  
 12 a quality plan agreed with Arconic and that she set up  
 13 BBA surveillance to start on a rolling basis from 2015.  
 14 But what she still didn't have was that information that  
 15 we're looking at in this letter of December 2014. We  
 16 heard yesterday, and we saw the documents, of her  
 17 attempts to get that information. On 18 December 2014  
 18 she wrote to Lilia Kosciuk, 7 January 2015,  
 19 12 January 2015.  
 20 Now, you're not copied on all of these emails, but  
 21 would you have been aware of them at the time?  
 22 A. I don't recall, but it is possible, if Valentina  
 23 discussed some of the aspects with me, that I would have  
 24 been aware, if she'd discussed with me.  
 25 Q. I see. Do you recall if she discussed with you all of

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1 these emails, or any of them?  
 2 A. I don't recall.  
 3 Q. I see.  
 4 Did you become aware of all of these attempts by  
 5 Ms Amoroso to contact Arconic at some later date?  
 6 A. I suspect I would have been aware at some point.  
 7 Q. I see. Before the close of this review you would have  
 8 been aware of it?  
 9 A. I suspect so.  
 10 Q. Can we please go to {BBA00008079}. Now, at the top we  
 11 see an email dated 22 January 2015, timed at 16.09.  
 12 It's from Valentina Amoroso to Lilia Kosciuk. It's also  
 13 to Claude Wehrle, but I notice that that email is spelt  
 14 wrongly, and to Céline Erny of Alcoa. It says this:  
 15 "Hi Lilia,  
 16 "Sorry for the late reply.  
 17 "Unfortunately in the last year we have experienced  
 18 several problems in getting in touch with you and  
 19 receive the required info to progress our job, this  
 20 leading to severe delays in closing this Review job.  
 21 For this reason BBA has decided to go ahead with the  
 22 information already in hands.  
 23 "I drafted a copy of the Review Report and I am  
 24 waiting for approval from my Team Manager. After that  
 25 you will receive it for your personal record."

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1 Now, just so I can understand the timing, you became  
 2 team manager on 5 January 2015, so a few weeks before  
 3 this; is that right?  
 4 A. Correct.  
 5 Q. So you were newly in the position of team manager at the  
 6 time of sending this email; is that right?  
 7 A. That's correct.  
 8 Q. Were you aware personally of this email?  
 9 A. I don't recall. I'm not copied there, but I don't  
 10 recall if I was aware of it.  
 11 Q. I see.  
 12 Were you aware of a decision, as she puts it, to go  
 13 ahead with the information already in hands?  
 14 A. I think I would have been aware of that, yes, because  
 15 the report ultimately came to myself for checking and  
 16 signing off, yes.  
 17 Q. I see.  
 18 Would Valentina Amoroso have had the authority to  
 19 make that decision?  
 20 A. Not just Valentina. Generally we would close the  
 21 reviews if we were not receiving all the email — we  
 22 wouldn't keep them open forever, you would just finish  
 23 it up, make conclusions with what information you have  
 24 and close the job. That was common practice.  
 25 Q. I see. We will come back to that answer. I just want

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1 to know: who was the decision-maker? Who would have had  
 2 the authority to close the review with the information  
 3 already in hand?  
 4 A. In this case, I would have signed off to close the  
 5 review with what we have, because that was the process  
 6 we were following at the time. If we are not getting  
 7 all the information and we have been chasing, chasing,  
 8 the instruction was you complete the review with what  
 9 you have and we close the job, with the decision  
 10 obviously of what the information gives you.  
 11 Q. I see.  
 12 Was there a conversation or a meeting about what  
 13 information you already had that would inform that  
 14 decision?  
 15 A. I'm not sure. In my case, in this case, I would have  
 16 looked through the report itself, the review report, and  
 17 made conclusions based on that.  
 18 Q. Do I understand correctly you just looked up the review  
 19 report, you wouldn't look at everything that  
 20 Valentina Amoroso had managed to gather in hand, as it  
 21 were?  
 22 A. The review report feeds from what information the  
 23 project manager would have reviewed.  
 24 Q. I see.  
 25 Was this a positive decision or was it something

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1 that just kind of occurred naturally when you received  
 2 the review report?  
 3 What I'm getting at is: was there a discussion in  
 4 which Valentina Amoroso said, "Hello, I've got all of  
 5 these documents, I don't really know what to do, they're  
 6 not responding, can we have a decision to carry on?" Or  
 7 was it perhaps more like Valentina understood that she  
 8 could just go ahead, provide you with the review report,  
 9 and it was BBA process that that would be enough?  
 10 A. I think it would have been, you know, both cases you  
 11 have outlined there. As I said, we were allowed to  
 12 complete reviews with whatever information we had on  
 13 file ultimately, and also probably Valentina would have  
 14 discussed also with me or alerted me to the fact that  
 15 she has this review that she hadn't managed to progress  
 16 in terms of the information. I think she would have  
 17 discussed with me.  
 18 Q. I see. You don't have any positive recollection of  
 19 a discussion about this review?  
 20 A. No, not a positive recollection, no.  
 21 Q. I see.  
 22 Am I right to understand, then, that the documents  
 23 in hand would have been the original assessment file,  
 24 S341014, the 2011 review and whatever else Ms Amoroso  
 25 could get from the internet?

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1 A. Yes, that would have been the case, yes.  
 2 Q. There wouldn't have been any other documents that I've  
 3 missed there?  
 4 A. Unless they did send something. I don't know whether  
 5 they completely sent nothing, I don't remember that, but  
 6 whatever they would have sent, we would have gone ahead  
 7 with that to make a conclusion and complete the review.  
 8 Q. On the basis that Arconic indeed sent nothing except for  
 9 the agreed quality plan, what the BBA did not have  
 10 specifically was written confirmation that there have  
 11 been no changes in the design, specification, context of  
 12 use or other details that would invalidate the  
 13 certificate; I'm right on that, aren't I?  
 14 A. Sorry, I missed that, you are right on what?  
 15 Q. You did not have what was in paragraph 2 of that letter:  
 16 written confirmation that there have been no changes;  
 17 that's what you could never get from an internet search.  
 18 A. That's correct.  
 19 Q. And nothing she did have would be a substitute for that  
 20 kind of information; do you accept that?  
 21 A. That's correct.  
 22 Q. Can we please go to your witness statement at page 7  
 23 {BBA00010783/7}, paragraph 20. You can see that we've  
 24 asked:  
 25 "What use would you expect the Project Manager make

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1 of the technical dossier that is compiled at issue?"  
 2 Which is that original assessment file, S341014, and  
 3 your answer is this:  
 4 "Together with the contents of the Certificate, the  
 5 PM should check the data/information in it is still  
 6 relevant."  
 7 My question is: in checking the data or information  
 8 on the certificate is still relevant, would you have  
 9 expected Ms Amoroso to have done an internet search of  
 10 the CSTB's website to check the fire performance  
 11 statements on the certificate and that they were still  
 12 correct?  
 13 A. No, we don't --  
 14 Q. Why not? Sorry.  
 15 A. As part of reviews, we don't get reports from websites,  
 16 test reports that is, and normally reviews don't involve  
 17 looking at test reports. It's a review of the  
 18 certificate itself, the technical literature, and, as  
 19 I said, looking at surveillance as well, not test  
 20 reports, which would have been looked at during the  
 21 original assessment itself.  
 22 Q. I see.  
 23 You say in your witness statement, though, that "the  
 24 PM should check the data/information in it is still  
 25 relevant". Are you saying that you wouldn't check the

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1 fire performance data even by looking at the CSTB  
 2 website?  
 3 A. We wouldn't look for reports on the CSTB website. It's  
 4 not common practice.  
 5 Q. I see.  
 6 Would you have expected Ms Amoroso to contact the  
 7 CSTB in another way to check that the data was still up  
 8 to date?  
 9 A. I think with confirmation certificates we would ask the  
 10 certificate holder if they can get a confirmation from  
 11 the other certification body to confirm to us that there  
 12 has been no change in the product.  
 13 Q. I see. That wasn't in the letters that were sent. Are  
 14 you telling me that when they sent written confirmation  
 15 it could be from Arconic or from the CSTB, or it was  
 16 supposed to be from the CSTB?  
 17 A. Ordinarily with confirmation certificates we would be  
 18 asking it from the certification body, so which would  
 19 have been the CSTB.  
 20 Q. I see, and that is in the particular instance of this  
 21 certificate being a confirmation certificate?  
 22 A. Confirmation, yes.  
 23 Q. I see.  
 24 Now, in this case, it was the BBA's standard request  
 25 to ask for written confirmation, and we saw that you

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1 told Arconic that they had to provide this information.  
 2 Can you explain why the decision to go only with the  
 3 documents in hand was made?  
 4 A. As I said, that was BBA process. If you are not  
 5 receiving the information, you conclude the review with  
 6 what you have, and then make a conclusion based on that  
 7 information.  
 8 MS HYNES: I see.  
 9 Sir, is that a convenient moment?  
 10 SIR MARTIN MOORE-BICK: Yes. It suits you, does it,  
 11 Ms Hynes?  
 12 MS HYNES: It does, thank you, sir.  
 13 SIR MARTIN MOORE-BICK: All right.  
 14 Well, as I said, Mr Nkomo, we will have a break  
 15 during the morning, and now we're going to take it.  
 16 So we will stop now. We will resume at 11.30,  
 17 please. I must ask you while we're on the break: please  
 18 don't speak to anyone about your evidence or anything  
 19 relating to it.  
 20 THE WITNESS: Okay.  
 21 SIR MARTIN MOORE-BICK: Right?  
 22 Thank you very much, 11.30, then, please.  
 23 (11.15 am)  
 24 (A short break)  
 25 (11.30 am)

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1 SIR MARTIN MOORE-BICK: Welcome back, everyone. We're now  
 2 ready to continue taking evidence from Mr Nkomo. I'll  
 3 just check that he is there and can see me and hear me.  
 4 Is that the case, Mr Nkomo?  
 5 THE WITNESS: That's the case, sir, yes.  
 6 MS HYNES: Thank you very much, sir.  
 7 Mr Nkomo, can you hear and see me?  
 8 A. I can, yes.  
 9 Q. Thank you.  
 10 In your evidence earlier, you said — I don't think  
 11 we need to turn it up, but we can if you need:  
 12 "In this case, I would have signed off to close the  
 13 review with what we have, because that was the process  
 14 we were following at the time. If we are not getting  
 15 all the information and we have been chasing, chasing,  
 16 the instruction was you complete the review with what  
 17 you have and we close the job, with the decision  
 18 obviously of what the information gives you."  
 19 I'm really interested in the words "the instruction"  
 20 you had.  
 21 Was it an instruction, in the sense of an official  
 22 policy of the BBA, to close a review with what  
 23 information you had?  
 24 A. I don't know whether officially, but that was the  
 25 process we would follow.

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1 Q. I see. Was that for all certificates, you just had  
 2 a general —  
 3 A. It was a general — yes, a general process.  
 4 Q. And was that general process understood at the levels  
 5 above you, so the head of approvals?  
 6 A. I don't — I think it would have come from above.  
 7 Q. I see. And in coming from above, what I'm really asking  
 8 is: was this the way the BBA worked officially?  
 9 A. I would say so. As I said, you would close, obviously,  
 10 then the decision is based on the information you  
 11 already have, then a decision is made on the validity of  
 12 that certificate.  
 13 Q. Yes, in fact I'll come to that exact point in just  
 14 one minute. I'm trying to understand your use of the  
 15 words you had "an instruction". Did somebody instruct  
 16 you or did you come to understand that there was  
 17 a general instruction within the BBA that you would  
 18 close a review if a certificate holder wasn't providing  
 19 information?  
 20 A. I had come to understand that was the general approach.  
 21 Q. Would this have been written down anywhere?  
 22 A. I've never seen it written down.  
 23 Q. I see. Would you expect it to have been written down?  
 24 A. A lot of what we do is based on written down procedures.  
 25 This one I don't — I've never seen it written down.

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1 Q. I see.  
 2 You have mentioned this closing the review and then  
 3 making a decision. I just want to understand: is that  
 4 effectively a two-stage process, you would make  
 5 a decision to close the review, then look at what you  
 6 had, and then make some decision about the validity or  
 7 any other action that needs to be taken? Have  
 8 I understood that correctly?  
 9 A. No. It's — you actually — at the closing of the  
 10 review, at the, you know, signing-off of the review  
 11 letter, that decision is made at that point, not after.  
 12 Q. I see.  
 13 So let me see if I understand it. You have all of  
 14 the information, you gather it into a review report or  
 15 checklist, depending on which methodology you're using  
 16 at the time, and gathering all of that information, you  
 17 then make a decision as part of that signing-off  
 18 process?  
 19 A. Correct.  
 20 Q. I see.  
 21 I want to just turn to the decision in this case  
 22 which we were talking about before the break.  
 23 We heard from Ms Amoroso that the review was in fact  
 24 supposed to have been completed by June 2014, and as at  
 25 the end of January 2015, when Ms Amoroso sent her letter

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1 about having the documents in hands, by that time this  
 2 review was more than six months overdue; that's right,  
 3 isn't it?  
 4 A. Yes, by those timeframes you give, yes, it would have  
 5 been.  
 6 Q. Was that an unusual period to be overdue by?  
 7 A. Reviews — some reviews did tend to become overdue, to  
 8 go beyond the six months. Now, I don't know the  
 9 proportion of those that would go to being six months  
 10 overdue, I wouldn't have that data.  
 11 Q. Looking at it now, does it strike you as quite a lengthy  
 12 period of being overdue?  
 13 A. It is a lengthy period, yes.  
 14 Q. Would the fact of it being this lengthy period overdue  
 15 have any bearing on the decision to go with the  
 16 documents that you already had?  
 17 A. At that time, I would say so.  
 18 Q. Ms Amoroso told us about there being some pressure to  
 19 close the reviews by the end of the financial year,  
 20 which was March. Was that your understanding?  
 21 A. Because there had been a lot of reviews that were  
 22 falling behind, becoming overdue, with the project  
 23 managers being kept busy with other assessment work, so  
 24 the company compiled a list of reviews, which is what  
 25 this one was part of, a list of those reviews that were

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1 already either overdue or coming to be overdue, and  
 2 that — during that timeframe that we're referring to,  
 3 the January — end of 2014, beginning of 2015, the teams  
 4 were specifically doing the project of focusing on  
 5 reviews that were getting overdue.  
 6 Q. I see. I think it's your evidence that this review was  
 7 in fact on that list?  
 8 A. If it was overdue, then it should have been on that  
 9 list.  
 10 Q. I see. I see.  
 11 Who would have compiled that list?  
 12 A. I think it would have come either from head of approval  
 13 or from the — and then cascaded down to team managers.  
 14 Q. I see.  
 15 A. Yeah.  
 16 Q. Was there therefore quite a big push to get all of these  
 17 reviews closed off in a timely manner?  
 18 A. Yes, in terms of resources, as I said, then PMs were  
 19 asked to focus on those reviews, to complete them. As  
 20 I said, from a resource point of view, a lot of them  
 21 were falling behind because project managers were  
 22 dealing with a lot of the assessment work that was in  
 23 hand, so now we were asked to focus on finishing those  
 24 reviews.  
 25 Q. So take project manager resource from assessment work

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1 and put it back on review work to get this set of  
 2 reviews finished?  
 3 A. Yeah, essentially, yes, focusing more on those reviews.  
 4 Q. It was basically there was a backlog?  
 5 A. Yeah, there was, that's why the list was compiled.  
 6 Q. I see.  
 7 With this list, was there a time period by which  
 8 these reviews needed to be finished by?  
 9 A. I can't quite remember, but I'm pretty certain there was  
 10 a timeframe that was given.  
 11 Q. Did that factor into the decision to close this review  
 12 without the information from Arconic?  
 13 A. From my point of view, no, because the information  
 14 hadn't been provided, and Maria had chased, Valentina  
 15 had chased, and I wasn't sure whether continuing to  
 16 chase would eventually get the information. As I said,  
 17 the process was: you complete the review with whatever  
 18 information you already had in hand, if you are not  
 19 getting any more from the client.  
 20 Q. Yes. My question really is: the decision to focus on  
 21 closing the backlog, was that any part of the decision  
 22 to just take what Ms Amoroso could find on the internet  
 23 as being the information from Arconic, was that a reason  
 24 to close this review?  
 25 A. I don't think so, because that process that I talked

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1 about earlier on of completing a review with the  
 2 information that you had, it was there even long before  
 3 that, as far as I understand.  
 4 Q. I see.  
 5 A. Yes.  
 6 Q. I see.  
 7 Can we go to {BBA00008073}. We will see an email  
 8 from you to Ms Amoroso on 10 April 2015. The subject  
 9 line is "S153729", and we recognise that as the project  
 10 number for this review, and you say:  
 11 "Valentina,  
 12 "Find attached the above Review report with my  
 13 comments. I have tracked the changes so you can just  
 14 accept if you agree and the report will be as good as  
 15 finished. I had a few questions on the surveillance  
 16 visit Table as shown.  
 17 "I will have all your 6 reports commented on by  
 18 Monday so we have them closed by next Friday at the  
 19 latest. I hate losing and the other teams are creeping  
 20 up the 'closed Reviews' leader board as can be seen on  
 21 the board behind Rakesh!! Once you have the report  
 22 ready bring me hard copies of both the report and  
 23 request log for sign off."  
 24 Now, Rakesh, who we see mentioned there, is he  
 25 a team manager for another team?

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1 A. Yes, he was a team manager for another team.  
 2 Q. Which team?  
 3 A. It was a building systems team.  
 4 Q. I see.  
 5 A. And including cladding as well. At the time some people  
 6 in cladding were under another team manager and some  
 7 were under Rakesh.  
 8 Q. I see. And was there a physical leader board hanging in  
 9 the office showing the number of completed reviews per  
 10 team?  
 11 A. Yeah, I think we had a — not a list, but number, just  
 12 say: okay, we have two closed, we have three closed, we  
 13 have four closed, not the actual list.  
 14 Q. I see, but there was a tally, perhaps?  
 15 A. Yes, correct.  
 16 Q. Was there some internal rivalry as to which team could  
 17 finish the most reviews?  
 18 A. I wouldn't call it rivalry, no.  
 19 Q. What would you call it?  
 20 A. We're focusing resources on completing reviews that were  
 21 outstanding.  
 22 Q. But you —  
 23 A. That's what it was.  
 24 Q. You expressly say there, "I hate losing and the other  
 25 teams are creeping up the 'closed Reviews' leader

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1 board". Was that not perhaps light-hearted, but was  
 2 that not at least some sort of competition going on?  
 3 A. I wouldn't call it competition. I think we were  
 4 motivating ourselves to focus on this work to finish the  
 5 reviews which had been — you know, which had lagged  
 6 behind in being completed.  
 7 Q. And part of that motivation was keeping a score?  
 8 A. Yeah, it was.  
 9 Q. Were you incentivised to have a certain number of  
 10 reviews closed?  
 11 A. You mean from management?  
 12 Q. Yes, from management.  
 13 A. No, there was no incentive.  
 14 Q. Did you have a deadline with management though?  
 15 A. I believe there was a deadline for completing the whole  
 16 project of completing the list of reviews, I believe  
 17 there was one.  
 18 Q. Do you remember when that deadline was?  
 19 A. No, I don't remember.  
 20 Q. I see. Were the BBA project managers aware of that  
 21 deadline?  
 22 A. I think they would have been aware.  
 23 Q. Were they in some way incentivised to close these  
 24 reviews?  
 25 A. Not according to my knowledge.

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1 Q. Was this, as you put it, motivation, was this a factor  
 2 in the decision to close the review of the Reynobond  
 3 certificate?  
 4 A. No, it wasn't a motivation. The reason for closing the  
 5 Reynobond was that was all the information that we had  
 6 and we followed what we had been made to understand: if  
 7 a client is still not providing all the information, you  
 8 complete the review with what you have, and then  
 9 a decision is made at the completion of that review.  
 10 Q. I see. But I still want to ask: do you think that this  
 11 leader board, this motivation at these deadlines, might  
 12 have put some pressure on project managers to close  
 13 reviews without full investigation?  
 14 A. I don't think so.  
 15 Q. Okay.  
 16 We can see in that email that we were just looking  
 17 at that the process was to issue a review report. Can  
 18 we just see what you have to say about that in your  
 19 witness statement at page 10 {BBA00010783/10}.  
 20 Now, near the top you can see a header saying  
 21 "Review S153729", and at the bottom, below where the  
 22 screen is, there is a question in bold at b. We have  
 23 asked about:  
 24 "Your knowledge of what  
 25 documents/information/assurances were requested from the

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1 certificate holder, and what was received."  
 2 Your answer is at paragraph 33:  
 3 "Other than the information that was referenced in  
 4 the Review report I don't know the rest of what was  
 5 requested specifically. There is generally a standard  
 6 list of information that is requested for all Reviews.  
 7 When checking the report, I asked about the availability  
 8 of tolerances' information due to the nature of the  
 9 statement in the report, which the PM confirmed in the  
 10 final report that it had been received. I don't  
 11 specifically know what was received as far as the rest  
 12 of the Review information is concerned."  
 13 Now, Mr Nkomo, can we take from that that you did  
 14 not check everything that Valentina Amoroso looked at  
 15 for this review?  
 16 A. Yes, that's correct.  
 17 Q. Would it have been wise to check what she'd done, given  
 18 she was still, I think, relatively new at the BBA?  
 19 A. I think the review itself, if you look through it, the  
 20 review itself that she had prepared, outlined her  
 21 findings from looking at the information that she had in  
 22 hand, whether it's from their website or not. To me,  
 23 her opinions of that information was clear from the  
 24 review report.  
 25 Q. Would you take her opinions as expressed on the review

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1 report and would you investigate those, or did you just  
2 trust that those opinions were correct?  
3 A. I'm not entirely sure I did comment on the report  
4 itself. I think — I believe I made a few comments  
5 on —  
6 Q. We see — sorry, Mr Nkomo, carry on.  
7 A. No, I was saying I made a few comments as part of that  
8 checking process.  
9 Q. Yes, we can see in your witness statement you said that  
10 you commented on the availability of tolerances  
11 information, but do I understand you just took her  
12 opinion on the rest of it as it was set out in the  
13 review?  
14 A. Yes, because to me it was clearly laid out in the review  
15 report.  
16 Q. Shall we take a quick look at the review report. It's  
17 {BBA00008072}. We can see at the bottom there that it's  
18 dated 10 April 2015. Is it right this is your  
19 signature?  
20 A. That's correct.  
21 Q. In this report, you can take it from me, she doesn't  
22 mention anything about checking fire, and she doesn't  
23 mention anything about not having received any written  
24 confirmation, whether it be as part of this being  
25 a confirmation certificate or otherwise.

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1 Now, would you have noticed that at the time?  
2 A. Regarding fire, no, because there is no expectation when  
3 we are carrying out reviews to look at test reports.  
4 Q. I see.  
5 A. Yeah.  
6 Q. And there is no mention of not having received any  
7 written confirmation.  
8 A. Yeah, with the confirmation, it's the way the report  
9 template is laid out, it's not obviously clear that  
10 someone can populate it with that information to the  
11 effect that they haven't received the confirmation.  
12 Q. Would that — how should I put it? — insight that you  
13 had not received that confirmation have been recorded in  
14 any other document?  
15 A. I'm not sure, because the — basically the two documents  
16 that form the review, so in this case at that time it  
17 was — the review report was the document that basically  
18 contained the findings of the review, so if it wasn't  
19 mentioned here, I don't expect it would have been  
20 mentioned elsewhere, other than on emails where  
21 a project manager did not get any response from the  
22 certificate holder.  
23 Q. Does that mean there wasn't any BBA record that Arconic  
24 had failed to provide this information that was  
25 requested?

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1 A. I think other than from emails, I don't think there was  
2 any other record.  
3 Q. Well, the next person coming to do the next review —  
4 let's say Ms Amoroso moves to another role, she leaves  
5 the BBA, and let's say that you — as we know, you did  
6 become a cladding expert, you're not so directly  
7 involved in all this process. The next person that  
8 comes to review this certificate, how would they know of  
9 the long history of Arconic failing to provide  
10 information if it's not in this review report?  
11 A. I think they may not — at least at that time they may  
12 not know. I mean, since then the review process has  
13 kind of evolved. With the new checklist, it — one of  
14 the sections specifically asks that question: has the  
15 certificate holder responded appropriately to all the  
16 questions and provided all the confirmations? And  
17 there's also a certificate log, where if a project  
18 manager working on a certificate now comes across any  
19 aspect that needs to be recorded, they will go on that  
20 certificate log which every other manager, whenever it's  
21 your turn to work on the certificate, you would go  
22 there, you would have a bit of history.  
23 Q. So when did that process change?  
24 A. I believe it changed in 2015, I think, the early part of  
25 2015. That's when we started using the review

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1 checklist.  
2 Q. I see. Yes, I see. We will see a review checklist  
3 later today.  
4 In the case that you were not using the review  
5 checklist, as in this review, you were using the review  
6 report, was that a weakness in the BBA procedure?  
7 A. I would say it certainly didn't provide continuity of  
8 knowledge about that certificate if someone else came  
9 along who wasn't familiar with the previous work.  
10 Q. I see.  
11 A. Just to correct something — not correct, just to  
12 clarify something as well, with the review checklist,  
13 when it was introduced in, I believe, early 2015, it  
14 didn't have that section, sorry, about confirmation by  
15 the PM to say: can you confirm that the certificate  
16 holder has provided all the necessary responses  
17 appropriately? I believe that aspect was added to the  
18 checklist probably in 2019, I believe.  
19 Q. So really quite recently?  
20 A. Or 2018 or 2019, thereabouts.  
21 Q. I see, yes.  
22 We saw that you signed the report, and really just  
23 to close this part of the topic off, you have accepted  
24 responsibility for the contents of that report; is that  
25 right?

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1 A. That's correct.  
 2 Q. Can we go to your witness statement at page 6  
 3 {BBA00010783/6}, please, paragraph 17.  
 4 You see we have asked you about suspension:  
 5 "A Certificate could be suspended in situations  
 6 where the Certificate holder is no longer meeting the  
 7 conditions of certification and have not rectified the  
 8 situation in a timely manner."  
 9 Given the volume of correspondence from the BBA with  
 10 no helpful answer from Arconic whatsoever, and given the  
 11 amount of time that had passed dealing with Arconic, and  
 12 given that the fact was that this review was months  
 13 overdue, should the certificate have been suspended?  
 14 A. Possibly.  
 15 Q. Was suspension ever discussed with you?  
 16 A. I don't recall a discussion looking at a suspension of  
 17 the certificate.  
 18 Q. Was suspension considered?  
 19 A. I don't recall.  
 20 Q. Now, I've understood that it was in fact the BBA process  
 21 to close the review and carry on with what you had. Is  
 22 that a weakness in the BBA process?  
 23 A. I'd probably say so, but the new process I think is —  
 24 that has come in kind of addresses that, as I say, the  
 25 new checklist specifically has that section being asked

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1 directly.  
 2 Q. I see.  
 3 Changing the subject slightly, I want to ask you  
 4 about cladding fires around the world. When you made  
 5 your witness statement, we asked you about what you knew  
 6 about the Lacrosse fire, The Torch fire and The Address  
 7 fire, and they happened between November 2014 and  
 8 December 2015.  
 9 Do you recall those fires?  
 10 A. I remember, yes, talk about the fires.  
 11 Q. You talked about the fires; who did you talk with about  
 12 the fires?  
 13 A. No, I said I remember the talk about the fires at the  
 14 time. It's something that I think was — when they  
 15 happened, people were talking about it in the  
 16 engineering department.  
 17 Q. I see, so other project managers, other team managers,  
 18 perhaps?  
 19 A. I don't know about team managers. I believe someone had  
 20 forwarded a video. I think there was a video of it soon  
 21 after it happened. I think that's how come people  
 22 started talking about it.  
 23 Q. I see.  
 24 I'm just going to tell you about two more fires:  
 25 were you aware of the Tamweel fire in the UAE in

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1 November 2012 or the Al Hafeet fire in the UAE in  
 2 April 2013?  
 3 A. I don't remember.  
 4 Q. What I'm really asking is slightly earlier than the  
 5 period 2014, so earlier fires from —  
 6 A. I can't remember. I don't recall.  
 7 Q. Did knowing about these fires perhaps indicate that care  
 8 should be taken to check the fire performance in BBA  
 9 certificates?  
 10 A. I don't know about checking fire performance in the  
 11 existing certificates as such. The certificates  
 12 themselves, once they're done, they go through layers of  
 13 checking, you know, like they would go through team  
 14 manager checking, the head of approvals checking, and at  
 15 the moment they would go through the technical  
 16 excellence team checking, so I wouldn't have imagined  
 17 that then we would go back to check the fire reports on  
 18 all the certificates at that time.  
 19 Q. I see. So even though there were international cladding  
 20 fires, you didn't therefore pay more attention to the  
 21 claimed fire performance on the certificates; is that  
 22 right?  
 23 A. Me specifically, I don't know, I'm not speaking —  
 24 I can't speak for everyone at the BBA. I'm saying  
 25 myself, I didn't necessarily go into the files to think

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1 I need to scrutinise, you know, the fire data that was  
 2 on the files.  
 3 Q. You told us earlier, and you are now a technical expert  
 4 in external façades, I think — forgive me if I have got  
 5 the title exactly wrong — but you're not yourself very  
 6 expert in fire; have I understood that correctly?  
 7 A. That's correct. That's correct.  
 8 Q. To be a technical expert in external cladding, what  
 9 expertise do you bring?  
 10 A. It's a general assessment of wall cladding, a lot of the  
 11 technical aspects regarding the assessment itself. Then  
 12 obviously there are specialised aspects, ie fire is one  
 13 of them, and, as I said, it's something where we have  
 14 people who understand fire more within the BBA, and  
 15 naturally if there are queries, we would go to those  
 16 people. Or aspects like durability, if there are issues  
 17 or queries with them, we would go to our construction  
 18 products department. So as a technical expert, you're  
 19 not expected to be an expert in all aspects, of course.  
 20 Neither can you be.  
 21 Q. I see, and your background is structural, I've  
 22 understood; is that right?  
 23 A. Structural, correct, yes.  
 24 Q. Is that where your expertise lies in cladding, would you  
 25 say?

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1 A. Yes, I would say it's not just structural, but I think  
2 an appreciation of a holistic approach to assessment.  
3 I mean, assessment of cladding itself is more than just  
4 the structural aspect. I think there are many nuances  
5 to it.

6 Q. I see.

7 I'm turning to a new topic. I'm turning to the  
8 re-issue contract in 2015. For your reference, the  
9 number is S157262.

10 My understanding is the 2015 review concluded that  
11 Arconic had to take up a re-issue contract. Do you  
12 recall that?

13 A. Yes.

14 Q. Can we go to Claude Wehrle's exhibit, part 18, at  
15 page 41, please, {MET00053158\_P18/41}. We see here  
16 a re-issue contract number S157262, and it's dated  
17 1 May, we see that at the top.

18 If we scroll to the bottom, we can see that  
19 Claude Wehrle signed this on 5 May 2015.

20 If we go up to page 38 in this exhibit  
21 {MET00053158\_P18/38}, we can see at the very top that  
22 Mr Wehrle has sent this to Mr Dicker at the BBA, and he  
23 says:

24 "Hi Gary,

25 "Please find enclosed the signed Reissue certificate

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1 contract for Reynobond."

2 Now, you, and not just you, every BBA witness who  
3 we've asked about this has said that the certificate  
4 holder did not take up or sign the contract. But what  
5 we see here is that Arconic did in fact agree to enter  
6 a contract to re-issue the Reynobond certificate.

7 Can you account for why the BBA thought the contract  
8 was not signed?

9 A. No, I can't. When contracts go out and they are — they  
10 are signed first and then they are paid for, and then  
11 an instruction is then given to us in the technical  
12 department to say you can start the work. I don't  
13 recall we're receiving any instruction to the effect  
14 that the job is now valid as recorded. It's  
15 a combination of the job — the contract being signed  
16 plus it being paid for. So I can't account for why then  
17 it didn't go the extra step of being paid for, and then  
18 made valid.

19 Q. I see.

20 You say in your witness statement that it wasn't  
21 signed, though. Does that mean that somehow the signed  
22 contract was missed?

23 A. As far as I know, I've never actually seen a signed  
24 version, that's why I assumed it was never signed,  
25 that's why the job was abandoned.

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1 Q. I see.

2 Was it your department that was responsible for  
3 monitoring this?

4 A. No. The department will prepare the contracts  
5 themselves from a technical point in terms of what work  
6 is required, and the contracts then are passed on to our  
7 commercial team, and the next that we would really get  
8 involved is when a contract has been signed and paid  
9 for, and authority has been given for us as technical  
10 people to start work. So it was the commercial team who  
11 chased contracts.

12 Q. I see.

13 I'm turning now to talk about the third review of  
14 the certificate which started on 12 October. Again, for  
15 your reference, that is S160286.

16 By 12 October, I've understood that you have moved  
17 into a dual role, you were the team manager but also  
18 technical expert from a few weeks previously, so new in  
19 that dual role. Is that right?

20 A. That's correct.

21 Q. Did being technical expert have any impact on the amount  
22 of time you were able to devote to being a team manager?

23 A. Over time, yes, it did.

24 Q. Did you still have the same number of project managers  
25 to manage?

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1 A. I can't quite remember the exact numbers, I think  
2 because there were quite numerous departures and new  
3 people coming in, so roughly that's probably correct,  
4 roughly.

5 Q. I see.

6 You said that over time, being technical expert had  
7 an impact on the amount of time you were able to devote  
8 to being a team manager; can you explain what you mean  
9 by that? Do you mean that at the beginning it was okay  
10 and you could manage all the project managers you had  
11 but, at some later date, the burden of being technical  
12 expert got greater?

13 A. Yes, because the — I think, as I said, there were quite  
14 numerous departures and incomings in the cladding team,  
15 and there was a lot of, I think, support required of  
16 those. So I — as time went on, more and more I had  
17 a lot of technical support and guidance and mentoring to  
18 do.

19 Q. I see.

20 A. Yes.

21 Q. At this time — and I'm talking about October 2016 —  
22 you were still the team manager for Valentina Amoroso,  
23 weren't you?

24 A. Correct.

25 Q. Can we please go to {BBA00011059/4}. We're going to see

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1 correspondence with Arconic in October 2016.  
 2 This is an email, we see at the top, dated  
 3 12 October 2016, timed at 17.09. She says,  
 4 "Dear Claude Wehrle". Down to the first substantive  
 5 paragraph:  
 6 "I have been designated as the Project Manager  
 7 responsible for coordinating the review of your BBA  
 8 Certificate 08/4510 and your name has been advised to me  
 9 by as our main liaison contact for this work.  
 10 "Our estimated time for the completion of this  
 11 project is approximately 4 months and to initiate the  
 12 work required for this review within that period, we  
 13 require the following information to be provided to the  
 14 BBA by Alcoa Architectural Products:  
 15 "1. Written confirmation from Alcoa Architectural  
 16 Products that there have been no changes to the raw  
 17 materials, manufacturing process or quality control  
 18 procedure, other than those already notified to the BBA.  
 19 "2. A copy of the current UK technical literature,  
 20 CE Marking (if applicable) and installation instructions  
 21 relating to the Certificated product.  
 22 "3. A list of customer complaints (if any) relating  
 23 to product quality for the projects in the UK and the  
 24 action taken to resolve them.  
 25 "4. Recent copies of completed quality control

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1 sheets for the manufacture of the product."  
 2 Now, that's a much shorter list than we saw in the  
 3 2013/2015 review, isn't it?  
 4 A. Yes, it is.  
 5 Q. Was that the practice, to send that shorter list at that  
 6 time?  
 7 A. I'm not sure whether at the time. As I said earlier on  
 8 in the hearing, I think there used to be a pool of — in  
 9 terms of information that would be requested, it depends  
 10 on which reference point a project manager was using.  
 11 You could have two jobs that have, as we can see here,  
 12 one having this list, another one having a previous  
 13 list.  
 14 Q. So was it up to the project manager to select what  
 15 information they would request from the certificate  
 16 holder?  
 17 A. It's not necessarily a question of which information for  
 18 them to select. I think there was basically a full list  
 19 of what we requested from clients. I think it just  
 20 depended on which reference point or which job a project  
 21 manager was referring to for that information. One may  
 22 not realise that one list was shorter than the other  
 23 because of the job that they are using as a reference  
 24 point for going forward.  
 25 Q. This is a review, and we've got the same project manager

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1 who would have had access to what had been asked of  
 2 Arconic in the past, mostly because she asked it, and  
 3 here we have a much shorter list.  
 4 Was it a matter of her judgement what she would ask  
 5 for from Arconic?  
 6 A. I think it's not a matter of judgement, I think it's  
 7 a matter of generally, as I said, there were kind of  
 8 a defined list of information that we would ask. It's  
 9 not a question of you going in and saying, "Okay,  
 10 I won't ask for this, I won't ask for this, I will  
 11 choose this one". So —  
 12 Q. So — sorry, carry on.  
 13 A. No, I think, as I said, it's a question of which  
 14 reference point a project manager used. Some jobs may  
 15 have had this list. It's possible this list was taken  
 16 from a previous job that had only these four, compared  
 17 to the slightly longer list that we looked at  
 18 previously.  
 19 Q. When you say reference point, I'm not quite sure  
 20 I understand. Do you mean perhaps that Ms Amoroso was  
 21 working on another job where she used this short list  
 22 and took that as a reference point, and that then became  
 23 the list to ask Arconic —  
 24 A. Yeah.  
 25 Q. — or have I got that all wrong?

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1 A. That's what I'm saying, that that may have been the case  
 2 here. I don't think she went through a list and said,  
 3 "No, I would exclude this or include this", I think this  
 4 was — this may have been a list from a previous request  
 5 we sent somewhere else.  
 6 Q. Well, was that right of her to do that, to take a short  
 7 list from another job and to send that to Arconic? Was  
 8 that an acceptable thing for her to do?  
 9 A. I don't know if she realised it was a shorter list,  
 10 I don't know that much.  
 11 Q. Because what we don't see in this list is that question  
 12 at paragraph 2 of those previous requests that we've  
 13 seen, written confirmation that there have been no  
 14 changes. We don't see that anywhere in this list, do  
 15 we?  
 16 A. No.  
 17 Q. So my question is: was it by this time a standard or  
 18 a habit or a practice to not ask for that written  
 19 confirmation that there have been no changes in the  
 20 design, specification, context of use or other details  
 21 that would invalidate the certificate?  
 22 A. I'm not aware that it was now the new standard.  
 23 Q. I see.  
 24 We saw in the evidence of Ms Amoroso that she never  
 25 did ask for that confirmation and Arconic never provided

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1 it. Was it acceptable for Arconic to never provide that  
 2 written confirmation by this time?  
 3 A. I think by the time of this review, we may not have  
 4 realised that the confirmation that was included in the  
 5 previous review still hadn't been provided.  
 6 Q. I see.  
 7 A. Because we would do this review then based on —  
 8 generally on this list that we had sent out. Unless  
 9 someone realised that the list — realised during the  
 10 course of the review that the new list is now shorter  
 11 than the original, we would have progressed on the  
 12 assumption that what we have asked for here is what we  
 13 required to complete the review.  
 14 Q. I see. So it relied on someone noticing?  
 15 A. I would say so, yes.  
 16 Q. Now, in this case, doesn't that mean that you were just  
 17 not getting that important confirmation from the  
 18 certificate holder?  
 19 A. I think that's what it would mean here.  
 20 Q. Can we go to the checklist for this review. You have  
 21 spoken of this checklist, and it's at {BBA00011085}. By  
 22 this time, this was the method for signing off reviews,  
 23 well and truly, if it began some time in 2015; I've  
 24 understood that correctly, haven't I?  
 25 A. Correct.

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1 Q. We see at the top there, I think, is that your  
 2 signature?  
 3 A. It is, yes.  
 4 Q. And your initials, PN, and the date, 15 November 2016;  
 5 is that right?  
 6 A. That's correct.  
 7 Q. Can we go to page 4 {BBA00011085/4}, please. At the  
 8 top, we see section 12, "Certificate check — data". It  
 9 says:  
 10 "(are data still relevant, calculation or test  
 11 methods up to date, not in conflict with a harmonised  
 12 standard, still meet required performance, etc)."  
 13 Can you tell us: what was the project manager  
 14 supposed to look at for that task?  
 15 A. I think here you would check the standards that are  
 16 listed in that particular certificate number one to see  
 17 whether they are still up to date, like has the standard  
 18 been revised? It could have been a 2010 standard, but  
 19 has it been replaced, let's say, by a 2015 standard? So  
 20 you check all the standard references that they're up to  
 21 date, and as the checklist says there, are all data  
 22 still relevant as well. So when you go through the  
 23 certificate, is the data that's there in the certificate  
 24 still relevant? Is it still up to date?  
 25 Q. Just about that, is data still relevant, would you have

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1 expected the project manager as part of this checklist  
 2 to check that the data pertinent to fire performance was  
 3 still relevant?  
 4 A. Not necessarily the fire data, because how we would do  
 5 it, while you are going through all the technical  
 6 literature and product brochures that you have received  
 7 from the client, you cross-check that whatever they're  
 8 claiming in their brochures, is it consistent with  
 9 what's in the certificate or is it consistent with  
 10 what's in the file? Sometimes some data may have been  
 11 assessed, but it's not necessarily the case that all  
 12 data is then put forward in the public document of the  
 13 file, so of the certificate itself.  
 14 Q. And specifically in this review we understand that the  
 15 fire test data itself was not checked. Was that in line  
 16 with the BBA standard process at the time?  
 17 A. I wouldn't have expected the fire data to be  
 18 specifically checked itself. As I say, as I explained,  
 19 the way — if the technical literature or the brochures  
 20 themselves are claiming values that are different to  
 21 what's in the certificate, or what's in the file, if  
 22 there is a claim in the brochures, you would go and  
 23 check with the certificate, is it similar? If it's not  
 24 in the certificate, you would go and check in the file,  
 25 is it similar?

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1 Q. But it's the nature of a marketing brochure, isn't it,  
 2 to not set out all of the test data, particularly if  
 3 some of that test data is unattractive? That's right,  
 4 isn't it?  
 5 A. I can't speak for certificate holders and how they do  
 6 brochures really.  
 7 Q. Well, what I'm getting at is: if you don't go and check  
 8 with the certificate holder that the test data is up to  
 9 date, the BBA would be at risk of omitting new fire test  
 10 data, wouldn't it?  
 11 A. I believe as part of certification, the conditions of  
 12 certification, certificate holders are required to  
 13 inform the BBA should there be any change to their  
 14 product anyway, as part of the terms and conditions.  
 15 Q. I see.  
 16 Can we look now at section 13, the "Certificate  
 17 check — wording", and can we look particularly at that  
 18 long paragraph, the third paragraph down. Bear with me,  
 19 you can see it is a long one. Ms Amoroso wrote:  
 20 "A general rewording is necessary as the Certificate  
 21 has never been reissued since its first issue in 2008  
 22 (The only reissue job ever raised — S157262 in 2015 —  
 23 was never taken up and then abandoned). Particularly,  
 24 since the product has a reaction to fire classification  
 25 of B, height and boundary restrictions apply and

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1 section 6 needs to be consistently revised in accordance  
2 with our latest templates. Also the client has  
3 confirmed in email dated 26.10.2016 that they don't  
4 manufacture the cassette so the 'Description' part of  
5 the Certificate needs to be revised to make clear that  
6 the client is only manufacturing flat sheets and that  
7 the use as cassette is outside the scope."

8 She goes on, and if we can just drop down to where  
9 she picks it up at 9.1, which is some seven lines from  
10 the bottom. She says:

11 "Also 9.1 ..."

12 Have you got that, Mr Nkomo?

13 A. Yes.

14 Q. "Also 9.1 needs to be revised as it is not appropriate  
15 to give a service life of 30 years based on 'historical  
16 evidences'; a thorough investigation in the initial  
17 assessment folder file (S341014 08—4510) has revealed  
18 that no tests were actually assessed for the panel. The  
19 durability statement was issued on the basis of the C5TB  
20 approval and some tests data carried out of the AI  
21 coated sheet ..."

22 Dealing with that in reverse order, really, we saw  
23 there that she said "a thorough investigation of the  
24 initial assessment folder file", and that number she  
25 gives there, S341014, that's the assessment conducted by

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1 Hamo Gregorian.

2 Now, when Ms Amoroso did this thorough assessment of  
3 that file, would you have expected her to have looked at  
4 all of the data in that file?

5 A. Not necessarily all the data. I think as you can see  
6 here, the reason she went to the original certificate  
7 file was when she — she read obviously the statement in  
8 the certificate that the durability was based on  
9 historical evidence, so she specifically went in looking  
10 at durability data, which is what we will do. If  
11 I spotted something that raises questions in my head,  
12 then I would then go into the actual original  
13 certification file.

14 Q. If you had that question about durability, am I right  
15 you would be looking at just the records of the  
16 assessment on durability, you wouldn't expand that to  
17 look at the rest of the data, other issues, for example  
18 fire?

19 A. I wouldn't expect, yes, her to be looking at everything  
20 else then under that folder.

21 Q. We see in section 13 that Ms Amoroso proposed two  
22 specific changes: she said references to the cassette  
23 variant were to be removed, and a height restriction was  
24 to be added.

25 I want to talk first about removing the references

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1 to the cassette variation.

2 Do you know what I mean by removing those references  
3 in that certificate?

4 A. I do, yes.

5 Q. Was that removal of those references because readers  
6 might think that the certificate covered cassette?

7 A. Yes.

8 Q. That the technical performances claimed in the  
9 certificate would apply equally to rivet and cassette?

10 Was that your understanding of how a reader might read  
11 that?

12 A. Yes, but more specifically, this particular aspect was  
13 as a result of the BBA discovering that there were no  
14 factory surveillance visits taking place to the  
15 companies that actually manufactured cassettes, it was  
16 based on that one aspect of surveillance, no  
17 surveillance, and the certificate holder specifically  
18 had said they bore no responsibility for the cassettes.  
19 That was the reason.

20 Q. Yes, yes, but up until that point, a reader of the  
21 BBA certificate for Reynobond might think that the fire  
22 performance, for example, would apply to cassette just  
23 as much as it would apply to rivet, and that was the  
24 problem; am I right on that?

25 A. Yes, I think the reader would assume the information

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1 that's in the certificate was applicable to both, unless  
2 otherwise stated in the certificate which format it  
3 applied to.

4 Q. What Ms Amoroso discovered was that that couldn't be  
5 relied on; am I right on that?

6 A. Based on the fact that there was no surveillance. It  
7 was purely a surveillance concern, lack of surveillance  
8 concern.

9 Q. And if the reader did rely on that certificate for  
10 cassette, the reader would be wrong; yes?

11 A. Sorry, could you repeat the question again?

12 Q. If the reader had the certificate, and they understood  
13 from it that they could put a cassette form on their  
14 building, and all of the technical performances that  
15 were stated in the certificate, they could take all of  
16 those technical performances and say, "Yes, they  
17 definitely apply to cassette because the BBA says they  
18 do, or I've understood from the BBA certificate that  
19 those technical performances will apply", the reader  
20 that does that could be making a mistake?

21 A. Yes, that's correct, unless the technical information  
22 that they were specifically reading about was clarifying  
23 that it is relating to a flat sheet alone or a cassette.

24 If it wasn't specific which format, a reader could —

25 Q. And really that —

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1 A. — as applying to everything.  
 2 Q. I see, and that was really the problem, because the  
 3 certificate didn't distinguish between cassette and  
 4 rivet; do you accept that?  
 5 A. Sorry, what do you mean, cassette and rivet? What do  
 6 you mean by rivet?  
 7 Q. The cassette fabrication and the rivet fabrication  
 8 aren't set out differently.  
 9 A. Okay.  
 10 Q. So a reader wouldn't understand there to be any  
 11 distinction.  
 12 A. Yes.  
 13 Q. And having made this discovery, or come to this  
 14 conclusion, the BBA certificate would actually have  
 15 something that was wrong on it. Do you see that? Do  
 16 you accept that?  
 17 A. Yes.  
 18 Q. So changing the certificate to no longer refer to the  
 19 cassette variant, was that not an urgent change?  
 20 (Pause)  
 21 A. It was a necessary change. I don't know whether I would  
 22 characterise it as urgent. As I said, when going  
 23 through this, the reason why — the decision to remove  
 24 the cassettes was based on the aspect of no  
 25 surveillance. I don't think myself I thought beyond —

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1 at the time, I thought beyond surveillance.  
 2 Q. Was this a case where the certificate might have been  
 3 suspended?  
 4 A. I don't know whether immediately or after, you know,  
 5 an attempt to have it revised quickly. I wouldn't know  
 6 in terms of timeframes. I don't have a timeframe in my  
 7 head.  
 8 Q. Are you aware of any consideration given to suspending  
 9 the certificate?  
 10 A. At the time, I don't believe I was aware of  
 11 consideration to suspend. I don't recall.  
 12 Q. I see.  
 13 Am I right that no information about this change  
 14 would have been published on the BBA website at the  
 15 time?  
 16 A. I don't think we have a mechanism on the website to  
 17 inform what certificate is being revised or changed.  
 18 I don't believe there is a mechanism, as far as I know.  
 19 Q. I see.  
 20 Now, we saw in the review checklist at section 13  
 21 a moment ago that there was to be a new statement added  
 22 to certificates with regards to a height restriction,  
 23 and Ms Amoroso referred to that as being the "latest  
 24 templates". Do you recall that wording?  
 25 A. Yes, I believe so.

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1 Q. Would you like to see it again?  
 2 A. No, I remember that, that's fine.  
 3 Q. Very well.  
 4 A. Yeah.  
 5 Q. Does that reference to "latest templates" mean that this  
 6 was standard wording?  
 7 A. I think there was a way of presenting the fire data,  
 8 which was basically stating what the reaction to fire  
 9 was of a product, and then what Valentina is referring  
 10 to now with the latest templates, it was now to go  
 11 further than that and actually put the interpretation of  
 12 what the reaction to fire means in terms of any height  
 13 or boundary restrictions.  
 14 Q. Well, let's have a look at an example of that in the  
 15 BBA certificate for Reynobond at {BBA00000046}. This  
 16 was the certificate as issued on 4 August 2017.  
 17 First of all, do you recognise this certificate?  
 18 A. Yes.  
 19 Q. We know it's the later one because you can see at the  
 20 top right there is a different building in there, isn't  
 21 there?  
 22 A. That's correct.  
 23 Q. It's shorter, isn't it?  
 24 A. Yes.  
 25 Q. We can see at the bottom, date of issue, it says

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1 4 August 2017. So we know that that's the date of this  
 2 certificate.  
 3 Could we now go to page 7 {BBA00000046/7}, and  
 4 section 7.3. It says:  
 5 "The products are not classified as being  
 6 'non-combustible' or of 'limited combustibility'  
 7 ('non-combustible' in Scotland) and so their use is  
 8 restricted to 18 metres in height unless a full scale  
 9 fire test to either BS 8414-1:2015 or BS 8414-2:2015 has  
 10 been conducted for the specific wall construction under  
 11 consideration, and the other requirements of BRE Report  
 12 BR 135:2013 have been met."  
 13 Now, is that the standard template wording?  
 14 A. I don't know whether it is word for word, but in terms  
 15 of the — including the height and the boundary  
 16 restrictions, I would say yes.  
 17 Q. I understand that what this statement is really saying  
 18 is that unless a product was of limited combustibility,  
 19 or better non-combustible, it couldn't be used over  
 20 18 metres; is that your understanding?  
 21 A. According to that statement, I would say so, yes.  
 22 Q. What do you understand limited combustibility to mean?  
 23 A. As I said, I'm not really an expert on fire, but in  
 24 general I think limited combustibility would be  
 25 a reaction to fire of class A2, other than A2-s1, d0.

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1 Q. Yes, so if one looks at the European classifications in  
 2 Approved Document B, limited combustibility is A2 or  
 3 better, really. I can hear Dr Lane already screaming  
 4 that I've got that slightly wrong, it's A2 and  
 5 non-combustibility would be A1, or you could follow the  
 6 British Standard BS 476-11. Does that ring any bells  
 7 with you?  
 8 A. Vaguely. As I said, I'm not really a — fire wasn't  
 9 my — or rather fire is not my area of expertise.  
 10 Q. So am I right that — was there an instruction to add  
 11 this statement to the relevant certificates for ACM?  
 12 Have I got that right?  
 13 A. Not at — pre-Grenfell fire, I think there was no  
 14 instruction to add to ACMs. I think what we were doing  
 15 at the time is to add any applicable height and boundary  
 16 restrictions based on the reaction to fire, whatever the  
 17 certificate was, not necessarily that it was ACM.  
 18 Q. I see, so —  
 19 A. It was after Grenfell that we then — the company,  
 20 rather, then looked at all ACM certificates in one go.  
 21 Q. I see. So it was any product that might come into the  
 22 rules about height restrictions and the BBA was looking  
 23 to add this wording; have I got that right?  
 24 A. As far as I understand, yes.  
 25 Q. Who would have made the decision whether it was

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1 appropriate to add this wording?  
 2 A. I don't recall. I think there were numerous discussions  
 3 that had been going on over a long period of time, so  
 4 I don't recall specifically who would have made that  
 5 final decision.  
 6 Q. So I'm really asking at the moment about: would  
 7 a project manager, on a case-by-case basis, say  
 8 pre-fire, look at the product and make a decision based  
 9 on their understanding of Approved Document B and the  
 10 Building Regulations about whether the height  
 11 restriction had to go on? Is that how, before the  
 12 Grenfell fire, the decision was made to add the height  
 13 restriction?  
 14 A. It wasn't on an individual PM basis. I think there was  
 15 an understanding at the time that, for certain reaction  
 16 to fires, height and boundary restrictions were to be  
 17 considered. So whenever a certificate came up for,  
 18 let's say, a review or a re-issue, and a project  
 19 manager, you know, spotted that there were no height or  
 20 boundary aspects included, then they will flag that up  
 21 to be considered at the next re-issue.  
 22 Q. I see. Were they given some training as to when it  
 23 would be appropriate to add this height or boundary  
 24 restriction?  
 25 A. I don't recall specifically at that time, but, as I said

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1 earlier on in the hearing, numerous seminars have been  
 2 held internally or given internally by the technical  
 3 excellence team, and some of them have focused on what  
 4 would constitute height and boundary restrictions being  
 5 applicable. But in terms of timeframe, I don't know  
 6 whether any of it was at that time, I can't say.  
 7 Q. I see.  
 8 You have said, I think, that you yourself don't have  
 9 a — and do correct me if I'm wrong on this — very  
 10 precise understanding of the definition of "limited  
 11 combustibility" and perhaps when the height restriction  
 12 should come on.  
 13 My question is: how did a project manager know that  
 14 they should consider putting this height restriction on?  
 15 A. The ... when template statements are prepared by the  
 16 technical excellence team, that would identify to say,  
 17 "If the reaction to fire is this, then these are the  
 18 sort of statements that we should be putting in", and  
 19 some of those then would refer to the height and  
 20 boundary. So there were template statements that were  
 21 made that would guide a project manager. Whether it was  
 22 there at that time precisely or not, I can't quite  
 23 remember.  
 24 Q. I see. And did the technical excellence team write  
 25 these templates?

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1 A. Yes.  
 2 Q. I see.  
 3 Now, you touched on this before, I think. My  
 4 question now is: how was the decision made? Was this  
 5 decision made by the technical excellence team, by  
 6 someone else?  
 7 A. Sorry, which decision?  
 8 Q. The decision that height restrictions would be  
 9 considered for any product which comprises part of  
 10 an external façade.  
 11 A. Ultimately it was the technical excellence team, hence  
 12 them preparing these guidance documents and standard  
 13 statements for all project managers to refer to.  
 14 Q. Now, during this 2016 review, was it mandatory — sorry,  
 15 not during this review. Let me take a different point.  
 16 At the beginning of 2017, before the fire, was it  
 17 mandatory for product manufacturers to have the height  
 18 restriction added to their certificate?  
 19 A. I don't know if it was mandatory, but it's something  
 20 that we were beginning to do. I think there had been  
 21 already certificates that had been revised for height  
 22 restrictions whenever they came up for review. So  
 23 I can't say whether it was mandatory.  
 24 Q. So it wouldn't automatically trigger a re-issue? This  
 25 decision that height restrictions should be considered

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1 didn't mean that all of the certificates that needed  
 2 a height restriction would have to be re-issued  
 3 immediately; it was more of an as and when they came up  
 4 for re-issue it would be added; am I right?  
 5 A. That's correct, yes.  
 6 Q. We spoke earlier about cladding fires in 2014 and 2015.  
 7 Can we look at your witness statement now at page 9  
 8 {BBA00010783/9}. We see at the top we have listed those  
 9 fires, The Torch, The Address, and the  
 10 Lacrosse Building.  
 11 If we scroll down to the question at d, you can see  
 12 we've asked of those fires:  
 13 "Was consideration of such events part of reviewing  
 14 certification?"  
 15 At paragraph 28 you say:  
 16 "Yes, with respect to clarifying any applicable  
 17 height restrictions."  
 18 Do I understand correctly that these fires were part  
 19 of the reason that the BBA added the height restriction  
 20 wording?  
 21 A. As far as I understood it, yes, they were part of that  
 22 process.  
 23 Q. And if that's right, given that fires were known about  
 24 in 2014 and 2015, do you know why this clarification was  
 25 not made much earlier?

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1 A. I don't know.  
 2 Q. Now, the certificate that we were looking at, the new  
 3 certificate, that was re-issued after the fire — we saw  
 4 the date, 4 August 2017 — and it was re-issued along  
 5 with eight other ACM certificates, and I think you  
 6 touched on that in your evidence, and all of them had  
 7 the height restriction warning. Was that because of  
 8 some new policy that came in after the Grenfell Tower  
 9 fire?  
 10 A. I think ACMs were already being — not just ACMs, as  
 11 I said earlier, certificates were now being clarified  
 12 for height and boundary restrictions, before the fire.  
 13 After the fire, then senior management decided,  
 14 rather than amending them as and when they came up for  
 15 a re-issue, the BBA would amend them all at the same  
 16 time.  
 17 Q. And amend them without permission or discussing with the  
 18 certificate holder; have I got that right?  
 19 A. I'm not speaking to the mechanism of how it was done,  
 20 I'm just speaking to the principle.  
 21 Q. I see.  
 22 A. I wasn't involved in the actual conversations with the  
 23 certificate holders myself.  
 24 Q. And just as a matter of principle, did you understand it  
 25 to be an urgent change?

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1 A. That's how I understood it, because initially I think  
 2 the company was — had planned to do this very quickly  
 3 and all in one go.  
 4 Q. And was that because of the fire?  
 5 A. I think that that contributed to that, because before  
 6 the fire they were not being revised all at once, it was  
 7 as and when they came. So I think it was instigated by  
 8 the fire to look at them all together in one go.  
 9 Q. I see.  
 10 Mr Nkomo, when you were team manager, you signed off  
 11 the 2015 review and you also signed off the 2016 review,  
 12 and those reviews did not discover that Arconic had test  
 13 reports, data and classifications for Reynobond PE that  
 14 were completely different and substantially lower than  
 15 those claimed on the BBA certificate.  
 16 By that I mean in 2011 Reynobond PE cassette was  
 17 classified E; January 2014, all Reynobond PE was  
 18 classified E; December 2014, Reynobond PE rivet was  
 19 class C—s2, d0; in December 2014, Reynobond PE cassette  
 20 remained class E; in September 2015, Reynobond PE rivet  
 21 was classified again with a black core as C—s2, d0; and  
 22 in September 2015, Reynobond PE cassette was still  
 23 class E.  
 24 At those classifications, Reynobond PE could not  
 25 meet the European classification stated in diagram 40 of

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1 Approved Document B, could it?  
 2 A. I imagine no.  
 3 Q. And it's a matter of fact that the review process didn't  
 4 uncover this information, did it?  
 5 A. No, it didn't.  
 6 Q. Would you agree that the BBA's review processes had  
 7 significant weaknesses?  
 8 A. I don't know whether it's weaknesses. In terms of the  
 9 test reports, as I said, the reviews themselves don't  
 10 look at test reports that were assessed at original  
 11 certification. Perhaps the weaknesses, as you say, is  
 12 if we had had the client confirm to us if there had been  
 13 any changes. So I would say from that point of view, to  
 14 me, that would have been the weakness, that we never got  
 15 that confirmation.  
 16 Q. Would you agree that mistakes were made in not getting  
 17 clear statements that no changes had been made and in  
 18 not getting up-to-date information?  
 19 A. I would say so.  
 20 MS HYNES: Mr Chairman, I've come to the end of my prepared  
 21 questions. Is it appropriate to take a short break?  
 22 SIR MARTIN MOORE—BICK: Well, I think it's necessary, isn't  
 23 it? Do you think ten minutes might be long enough?  
 24 MS HYNES: Yes, ten minutes should be enough.  
 25 SIR MARTIN MOORE—BICK: Yes.

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1 Mr Nkomo, when counsel gets to the end of her  
 2 questions, we always have a short break so that she can  
 3 check that nothing has been omitted, and also to enable  
 4 others who are following the proceedings to put forward  
 5 questions that they think we ought to ask you.  
 6 So we're going to take a short break now. We will  
 7 come back and continue at 12.55, please, and see if  
 8 there are any more questions for you. There may or may  
 9 not be, I don't know. So that's what we will do.  
 10 Can I ask you, please, not to talk to anyone about  
 11 your evidence during the break or anything to do with  
 12 it, and we will see you at 12.55.  
 13 THE WITNESS: Okay, thank you.  
 14 SIR MARTIN MOORE-BICK: Right, thank you very much.  
 15 (12.45 pm)  
 16 (A short break)  
 17 (1.00 pm)  
 18 SIR MARTIN MOORE-BICK: Welcome back, everyone. We will see  
 19 now if Ms Hynes has any more questions for Mr Nkomo.  
 20 Mr Nkomo, first, are you there? Can you see me and  
 21 hear me all right?  
 22 THE WITNESS: I can, yes.  
 23 SIR MARTIN MOORE-BICK: Good, thank you very much.  
 24 Well, then, we will see now if Ms Hynes has any more  
 25 questions for you.

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1 Yes, Ms Hynes.  
 2 MS HYNES: Thank you very much, sir.  
 3 Mr Nkomo, can you see and hear me?  
 4 A. I can, yes.  
 5 Q. I'm afraid I do have a few very short questions.  
 6 The first is: thinking back to when you were project  
 7 manager doing review work, and when you were first  
 8 managing Ms Amoroso's review, can you tell us who the  
 9 fire experts were that you would refer to?  
 10 A. I don't quite recall at the time, but Jon Denyer and  
 11 John Albon were there since the time I joined the BBA.  
 12 Now, I'm not particularly sure whether Valentina and  
 13 myself were referring to them at that specific moment in  
 14 time.  
 15 Q. Were they recognised as people to go to for fire  
 16 expertise at that time?  
 17 A. Not expertise; guidance, really.  
 18 Q. I understand.  
 19 I want to now just ask about suspension.  
 20 Ms Amoroso said in her evidence yesterday that it  
 21 was common practice within the BBA that suspension of  
 22 a certificate would happen when there was active denial  
 23 of the certificate holder to allow factory visits. Is  
 24 she right about that? Was that the BBA policy at the  
 25 time.

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1 A. I think she is right, yes.  
 2 Q. And who would have decided that?  
 3 A. I think normally in those cases, if the project manager  
 4 came across that fact, that the certificate holder  
 5 obviously was, as you put it, denying surveillance, then  
 6 there is a form that — it's either the project manager  
 7 would go and discuss with their team manager or the head  
 8 of approvals, or in any case there is a form that would  
 9 be required to be filled, and the project manager would  
 10 need to put the reasons for the proposed suspension.  
 11 Q. So Ms Amoroso said that it was when there was active  
 12 denial; were there any other circumstances in which  
 13 suspension would be considered?  
 14 A. Yes, not only surveillance, I think also it depends on  
 15 a case-by-case basis. As I said, if we came across  
 16 a situation where there was something that's not  
 17 quite ... a query that I think we are looking for  
 18 a response and we aren't getting that response, but that  
 19 response is fundamental to our ability to decide that  
 20 the certificate in its entirety is valid, I think that  
 21 would be another cause. But there are numerous  
 22 different reasons for suspending.  
 23 Q. Have you ever personally raised a certificate as  
 24 a candidate for suspension?  
 25 A. I have, yes.

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1 Q. And what were the circumstances of that?  
 2 A. I think we had reason to believe, that's the BBA, in  
 3 that case that the product that was now being sold was  
 4 drastically different to what we assessed, and efforts  
 5 to get the situation rectified I think hadn't progressed  
 6 for quite a while.  
 7 Q. How often would a suspension occur? Was it a relatively  
 8 infrequent event? Was it something discussed more  
 9 regularly?  
 10 A. I can't say. As I said, in my case, the one I can  
 11 remember that I was involved in a suspension — I think  
 12 I can remember definitely one. But it wasn't  
 13 an uncommon discussion to be had, to say, "Should we  
 14 consider suspending this certificate because of A, B,  
 15 C?" It wasn't an uncommon conversation to be had with  
 16 either a team manager or a head of approval who  
 17 ultimately signs off on that action.  
 18 Q. I think it's your evidence, can you clarify, that you  
 19 don't recall any conversation about suspending the  
 20 Reynobond certificate, at least before the fire?  
 21 A. I don't specifically recall, myself.  
 22 MS HYNES: Well, sir, those are my questions.  
 23 Mr Nkomo, I just want to say thank you very much for  
 24 coming and helping us today, it's very much appreciated.  
 25 THE WITNESS: Thank you.

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1 SIR MARTIN MOORE—BICK: Yes, Mr Nkomo, those are all the  
 2 questions we have for you. On behalf of myself and the  
 3 whole panel, I would like to thank you very much for  
 4 making yourself available to give your evidence to us,  
 5 it's been very helpful to hear what you have to tell us,  
 6 so we are indeed very grateful, and that's the end as  
 7 far as you're concerned.  
 8 Thank you very much indeed.  
 9 THE WITNESS: Thank you.  
 10 SIR MARTIN MOORE—BICK: Thank you very much.  
 11 (The witness withdrew)  
 12 SIR MARTIN MOORE—BICK: Right. Well, we will break now for  
 13 lunch in the usual way, and we will resume at 2.05,  
 14 please.  
 15 Thank you.  
 16 (1.05 pm)  
 17 (The short adjournment)  
 18 (2.05 pm)  
 19 SIR MARTIN MOORE—BICK: Good afternoon, everyone. We are  
 20 now going to start hearing evidence from a new witness,  
 21 Mr Brian Moore.  
 22 I'm going to begin by checking that he can see me  
 23 and hear me clearly, so that we can establish  
 24 communication.  
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1 MR BRIAN MOORE (called)  
 2 SIR MARTIN MOORE—BICK: Good afternoon, Mr Moore.  
 3 THE WITNESS: Good afternoon, Mr Chairman. I can hear you  
 4 loud and clear.  
 5 SIR MARTIN MOORE—BICK: Very good, thank you very much.  
 6 Now, I understand that you're going to take the  
 7 oath, is that right, rather than make an affirmation?  
 8 THE WITNESS: Yes.  
 9 SIR MARTIN MOORE—BICK: So my first question is: do you have  
 10 the Testament there?  
 11 THE WITNESS: Yes, I do.  
 12 SIR MARTIN MOORE—BICK: On your screen you should have the  
 13 words of the oath. Have you got those?  
 14 THE WITNESS: Yes, I have.  
 15 SIR MARTIN MOORE—BICK: Thank you.  
 16 I must ask you, then, to take the Testament in your  
 17 right hand and repeat the words on the screen, please.  
 18 (Witness sworn)  
 19 SIR MARTIN MOORE—BICK: Very good, thank you very much  
 20 indeed.  
 21 Now, we have one or two small housekeeping matters  
 22 we have to deal with before we actually put some  
 23 questions to you.  
 24 First of all, can you confirm that you're alone in  
 25 the room from which you're giving evidence?

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1 THE WITNESS: Yes, I confirm that.  
 2 SIR MARTIN MOORE—BICK: Thank you.  
 3 Can you confirm that you have no documents or other  
 4 materials with you?  
 5 THE WITNESS: Yes, I confirm that.  
 6 SIR MARTIN MOORE—BICK: Thank you.  
 7 Finally, can you confirm that your mobile phone is  
 8 in another room and that you don't have any other  
 9 electronic device with you capable of receiving  
 10 messages?  
 11 THE WITNESS: Yes, I confirm that.  
 12 SIR MARTIN MOORE—BICK: Very good, thank you very much.  
 13 Well, I hope we shan't have problems with sound or  
 14 vision, but if we do, we will probably take a short  
 15 break to let the technical support team sort them out.  
 16 We will have a short break during the afternoon,  
 17 about 3.15 or whenever it's convenient, but if you need  
 18 an additional break at any stage, will you please say so  
 19 and we will do our best to accommodate you.  
 20 Before we start, is there anything you would like to  
 21 ask me or anything you need to draw to my attention?  
 22 THE WITNESS: No, thank you.  
 23 SIR MARTIN MOORE—BICK: Very good.  
 24 Therefore, I'm going to ask Mr Millett if he would  
 25 like to put some questions to you.

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1 When you're ready, Mr Millett.  
 2 Questions from COUNSEL TO THE INQUIRY  
 3 MR MILLETT: Thank you very much, Mr Chairman.  
 4 Good afternoon, Mr Moore. Can I start by asking you  
 5 whether you can see me and hear me clearly?  
 6 A. Yes, I can hear you and see you clearly.  
 7 Q. Thank you very much.  
 8 Thank you very much for attending this  
 9 public inquiry to give your evidence. We are extremely  
 10 grateful to you.  
 11 If you have any difficulties in understanding any of  
 12 the questions I'm going to put to you or you would like  
 13 me to put the question again or in another way, please  
 14 don't hesitate to let me know.  
 15 Can I also please ask you to keep your voice up so  
 16 that the transcriber, who is also on this call, can get  
 17 down your evidence very clearly.  
 18 Can I also advise you not, please, to nod or shake  
 19 your head silently, but to say "yes" or "no" as the case  
 20 may be, because that can go onto the transcript.  
 21 If you need a break at any time other than the times  
 22 that the Chairman has indicated we are likely to take  
 23 a break, again, please let us know and we can take  
 24 a short break.  
 25 Now, you have made two witness statements to

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1 the Inquiry. I would like to show you the first of  
 2 those, please, and that is at {BBA00000159}.

3 Looking at the screen in front of you, is that the  
 4 first page of your first statement dated  
 5 12 November 2018?

6 A. Yes.

7 Q. Can you please turn to page 14.

8 There, above the date of 12 November 2018, below the  
 9 statement of truth, is a signature. Is that yours?

10 A. Yes.

11 Q. Have you read that statement recently?

12 A. Yes.

13 Q. Can you confirm that the contents of that first  
 14 statement are true?

15 A. Yes.

16 Q. Now, you have provided a second statement to  
 17 the Inquiry, and we find that at {BBA00011097}. Can we  
 18 look at that, please. You can see that the date of that  
 19 is 18 November 2020.

20 Can you confirm that that is the first page of your  
 21 second statement?

22 A. Yes.

23 Q. Can you go to page 4, please. You will see on that  
 24 page, just above the date, a signature under the  
 25 statement of truth. Is that your signature?

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1 A. Yes.

2 Q. Can you confirm that you have read this statement  
 3 recently?

4 A. Yes.

5 Q. Can you confirm that its statements are true?

6 A. Yes.

7 Q. Have you discussed the evidence that you're going to  
 8 give today with anybody before coming on to this call?

9 A. No.

10 Q. I'm going to start the substantive questions by asking  
 11 you about your background and role.

12 Can I begin with paragraph 1, page 1 of your first  
 13 statement, please {BBA00000159/1}. You say there that  
 14 you're:

15 "... an Executive Director of the British Board of  
 16 Agrément (BBA) a non-profit distributing company which  
 17 operates in the construction products' assessment,  
 18 certification, testing and auditing sector. I have been  
 19 with the Company since October 2014 as the Operations  
 20 Director until June 2018 when I was appointed as the  
 21 Deputy Chief Executive Officer in addition to my duties  
 22 as Operations Director."

23 Is it right to say that you left the BBA in  
 24 January 2020?

25 A. Yes.

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1 Q. Why did you leave?

2 A. To take up another appointment elsewhere.

3 Q. And where do you work now?

4 A. I'm a director in a security company.

5 Q. Was that the place for which you left the BBA?

6 A. Yes.

7 Q. If we go to paragraph 2, you say:

8 "I am neither an engineer nor a scientist and my  
 9 role is to provide senior management oversight within  
 10 the Company. Where necessary, I seek and act upon  
 11 specialist technical advice from expert colleagues and,  
 12 exceptionally, from suitable outside sources."

13 Could you just give us a précis, if you would,  
 14 please, of your educational background?

15 A. I have a Bachelor of Science degree in social sciences,  
 16 I have a Master of Arts degree in human rights, I have  
 17 a postgraduate diploma in criminology, and I have  
 18 a Master's degree in business administration, and I'm  
 19 currently a doctoral candidate in respect of certain  
 20 aspects of law.

21 Q. And what aspects of law are those?

22 A. To do with whistleblowers.

23 Q. Right.

24 Can you explain your career history that led to you  
 25 going to work for the BBA in 2014?

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1 A. Immediately before I joined the BBA, I was a student  
 2 studying the Master's degree, Master of Arts degree that  
 3 I referred to earlier on. At the same time, I was  
 4 conducting some consultancy work as a mentor trainer and  
 5 also for a domestic violence charity in the private  
 6 sector.

7 For the 30 years preceding that, I was a police  
 8 officer and investigator and senior manager in the  
 9 service, and I was interested in experiencing the  
 10 private sector, and I was approached by a headhunting  
 11 organisation keen to find an operations director at the  
 12 BBA and, after some discussions with them and the  
 13 organisation, I decided to accept an appointment in  
 14 October 2014.

15 MR MILLETT: Yes, thank you.

16 Mr Chairman, I have had a message that Ms Istephan  
 17 has disappeared from the screen. I don't know whether  
 18 that's general. It's true for me, it may be true for  
 19 everybody else. That's a problem.

20 SIR MARTIN MOORE-BICK: Yes, I'm just checking that she has  
 21 not just moved around the display. But you're right,  
 22 I think she has disappeared.

23 Right, you see, Mr Moore, I shouldn't have said that  
 24 I hoped we wouldn't have any technical problems; it  
 25 looks as though we may have one straightaway.

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1 I think what we'd better do is have a short break  
 2 and see if we can recover Ms Istephan, because she,  
 3 I know, will want to hear your evidence, and she ought  
 4 to be here so that she can see it as it's given.  
 5 So I'm going to suggest we break for as short a time  
 6 as we can. Since this is the first break in your  
 7 evidence, I'm going to say this now, but I'll probably  
 8 say it again: please don't talk to anyone about your  
 9 evidence or anything to do with it while you're  
 10 off-screen, so to speak. All right?  
 11 THE WITNESS: I understand.  
 12 SIR MARTIN MOORE-BICK: We will come back as soon as we can.  
 13 Right, thank you.  
 14 (2.15 pm)  
 15 (A short break)  
 16 (2.21 pm)  
 17 SIR MARTIN MOORE-BICK: Welcome back, everyone. I'm sorry  
 18 about that break in the proceedings. We think we've now  
 19 got Ms Istephan connected well enough to continue, so  
 20 we're going to go on with Mr Moore's evidence, but if it  
 21 transpires that Ms Istephan can't receive well enough in  
 22 order to understand the evidence, then we may have to  
 23 break again. But for the moment we're going to carry  
 24 on.  
 25 Mr Moore, I see you there. You can hear me and see

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1 me, I hope?  
 2 THE WITNESS: Yes, I can.  
 3 SIR MARTIN MOORE-BICK: Good, thank you.  
 4 Well, I apologise for that break in service, so to  
 5 speak, but we think we are back up and running, so we'll  
 6 carry on and I'll ask Mr Millett to go on with the  
 7 questions.  
 8 Yes, Mr Millett.  
 9 MR MILLETT: Thank you very much, Mr Chairman.  
 10 Mr Moore, I wonder if we could go back, please, to  
 11 your first witness statement at paragraph 2 on page 1  
 12 {BBA00000159}, and have that displayed on the screen in  
 13 front of you.  
 14 You see there, and I read to you, that you said:  
 15 "Where necessary, I seek and act upon specialist  
 16 technical advice from expert colleagues and,  
 17 exceptionally, from suitable outside sources."  
 18 In general at your time at the BBA, from whom did  
 19 you seek expert advice internally?  
 20 A. Depending upon the field, it would be the technically  
 21 qualified departmental head. There was also  
 22 a consultant senior scientist with a roving commission  
 23 inside the BBA. Those would be the principal sources of  
 24 advice that I would consult with.  
 25 Q. And who was the consultant senior scientist with the

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1 roving commission in 2014 when you started, do you  
 2 remember?  
 3 A. Erm ... forgive me, I've forgotten his surname. First  
 4 name is Jon, Jonathan. I can't remember his surname,  
 5 I'm afraid.  
 6 Q. Did the person occupying that role change between then  
 7 and your departure from the BBA?  
 8 A. No. No, in approximately 2018 a director with  
 9 responsibility for technical affairs, a very senior  
 10 engineer, was recruited and appointed into the BBA, who  
 11 again was the principal source of engineering advice and  
 12 direction to the business.  
 13 Q. And what was their name?  
 14 A. That was a Mr Paul Valentine.  
 15 Q. Right, yes.  
 16 Looking back at your paragraph, you also say, "and,  
 17 exceptionally, from suitable outside sources". During  
 18 your time at the BBA, in general again, from whom would  
 19 you seek advice from outside the BBA?  
 20 A. There was something called TAC, which was the technical  
 21 advice committee. This was a body of distinguished  
 22 people from outside the organisation who, at the  
 23 discretion of the chief executive officer, would be  
 24 invited to form a body about whom particular issues  
 25 could be discussed. I didn't have a huge amount of

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1 dealing with them myself, but occasionally it would be  
 2 to refer significant projects, I can remember one that  
 3 I did discuss with them.  
 4 Q. I follow.  
 5 Did TAC have any day-to-day contact on projects as  
 6 they were ongoing with individuals more junior within  
 7 the BBA, for example project managers?  
 8 A. No, I don't believe that was the case.  
 9 Q. Did TAC have any fire expertise on it at any time?  
 10 A. I can't specifically recall whether it did or it didn't.  
 11 Q. Turning to your role and responsibilities, as operations  
 12 director, to whom did you report?  
 13 A. I reported to the chief executive officer.  
 14 Q. And at 2014, who was that?  
 15 A. That was Claire Curtis-Thomas.  
 16 Q. And did that reporting line change between your arrival  
 17 in 2014 and your departure?  
 18 A. No.  
 19 Q. How many people under you did you manage?  
 20 A. It varied slightly. Usually more than 100 people.  
 21 Q. Did all 100 report to you directly in your role as  
 22 operations director?  
 23 A. No, there were four departments, one which managed  
 24 audit, one which managed inspections, two which managed  
 25 assessments and certification, but that was effectively

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1 one department split into two. There was a test area  
 2 which had its own operational responsibilities. Those  
 3 were the principal departments which reported to me  
 4 through a technically competent head of profession in  
 5 each one.  
 6 Q. Looking particularly at the two or perhaps combined  
 7 single assessment and certification department, from  
 8 October 2014, who was it from that department who  
 9 reported to you?  
 10 A. Mr Brian Chamberlain was the first person in post,  
 11 probably — forgive me on dates — throughout 2015, then  
 12 a Mr Simon Wroe throughout 2016 into 2017, and then in  
 13 2018 to 2019, some restructuring took place, and a lady  
 14 called Ramona took over as the manager of that team,  
 15 Ramona Donnelly.  
 16 Q. What responsibilities did you have as an operations  
 17 director?  
 18 A. So broadly it was two-fold: the productivity of the  
 19 staff, because obviously as a commercial organisation,  
 20 there were expectations about income that had to be  
 21 achieved through productive activity; and, secondly,  
 22 quality. The BBA has a regulator and is assessed  
 23 against a standard called 17065, I believe, which had —  
 24 so it was a quantitative element and a qualitative  
 25 element.

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1 Then from approximately April 2015 I was appointed  
 2 to the board of the BBA, and thereafter, of course, had  
 3 the normal fiduciary duties of a director at a more  
 4 strategic level to, you know, deliver the success of the  
 5 business, et cetera, at that board level.  
 6 Q. What did your job as operations director involve on  
 7 a day-to-day basis? Can you give us a précis of that?  
 8 A. Usually it would be sort of aligning resource to demand,  
 9 the issues of, you know, problems or difficulties that  
 10 staff wanted to consult me about operationally.  
 11 Particularly during 2015 and into 2016, I began to take  
 12 an interest in intelligence about the industry and  
 13 making sure that anything that related to poor practice  
 14 in the industry that was coming to our attention was  
 15 brought to my attention so that I could decide how best  
 16 to deal with it.  
 17 So, summarising that, aligning resource to demand,  
 18 achieving productivity, problem solving, trying to  
 19 identify risks and just maintain an efficient and  
 20 effective approach to delivering the business of the  
 21 BBA.  
 22 Q. Yes, thank you.  
 23 Now, we've heard in the evidence of Prayer Nkomo  
 24 that when a certificate was suspended or withdrawn, it  
 25 would be passed to a team manager or head of approvals

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1 or, he said, operations manager for sign-off, and then  
 2 a director for final sign-off. Does that accord with  
 3 your recollection?  
 4 A. Yes, that sounds quite reasonable. During 2014 and  
 5 2015, maybe 2016, there was a company secretary whose  
 6 role was to deal with signing off, the final signature,  
 7 if you will, on behalf of the CEO, for suspended or  
 8 withdrawn certificates.  
 9 Q. Were you ever involved in the process of signing off  
 10 a suspension or withdrawal of a certificate during your  
 11 time as operations director?  
 12 A. Yes.  
 13 Q. Which certificate specifically, can you recall?  
 14 A. No, I can't recall which specific certificate.  
 15 Q. Was there one or was there more than one?  
 16 A. I would say there was more than one.  
 17 Q. Right. Were there many?  
 18 A. Not many. Over a four to five-year period, double  
 19 figures, possibly. Not common, but not rare.  
 20 Q. In the main, in your experience at the time, what would  
 21 have been or what were the reasons for the BBA  
 22 suspending or withdrawing those certificates?  
 23 A. There was a significant deviation from the expectations  
 24 of what a client should be doing, some form of potential  
 25 abuse, if there was intelligence about malpractice, or

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1 that the certificate was no longer in conformity for  
 2 some significant reason, and that could not be  
 3 remediated promptly or properly.  
 4 So it was normally a relatively serious thing. One  
 5 can imagine the commercial effects upon some companies  
 6 of having their certificate suspended and withdrawn.  
 7 I think due process, you know, you suspend first,  
 8 and then subsequently, if matters aren't remediated,  
 9 move on to withdrawal. I think — I can't remember too  
 10 many cases of a certificate being withdrawn, you know,  
 11 right from the very start. Yeah.  
 12 Q. Thank you.  
 13 Now, you became, I think, deputy chief executive  
 14 officer in 2018; is that right?  
 15 A. That's correct.  
 16 Q. What did that role involve?  
 17 A. The BBA was, like many organisations, undertaking  
 18 a change process, trying to restructure, modernise, it  
 19 was opening an office in other parts of the country, and  
 20 so the draw on time of the chief executive officer  
 21 whilst we were doing all this and the normal day-to-day  
 22 activities of the business meant that she needed a more  
 23 substantive deputy, and that was my role. There was  
 24 just extra things going on in the company that were  
 25 bearing down on the senior management team and it was

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1 decided to have a deputy to support the CEO when she was  
 2 not available .  
 3 Q. Did you report to her?  
 4 A. Yes.  
 5 Q. What additional responsibilities came with that role?  
 6 A. Largely about change management. My role was to give  
 7 particular focus to the change of structure, the  
 8 modernisation programme, taking all that stuff forward  
 9 had quite a heavy and additional burden, and it also  
 10 coincided, of course post this terrible tragedy, that  
 11 the BBA was very active in trying to improve things in  
 12 the industry, which required the CEO to be elsewhere  
 13 quite a lot of the time.  
 14 Q. Did the change process begin after the Grenfell Tower  
 15 fire?  
 16 A. No, the organisation was always trying to change to  
 17 improve. I think the formalisation of the process —  
 18 oh, you might be right, thinking about it. The actual  
 19 structure — you know, the plan was probably put into  
 20 place circa 2018, but it had been run-up — you know,  
 21 the run-up to it was before that, and approaching the  
 22 governing board for sign-off was probably 2018, but  
 23 there was quite a lot of activity going on before then.  
 24 Q. Were you ever involved in the actual certification of  
 25 products certified by the BBA, or was your role a purely

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1 managerial one?  
 2 A. I didn't do any physical assessments of products or  
 3 systems, no, I wasn't qualified to do that.  
 4 Q. Were you ever asked to sign off any certificates or  
 5 check any drafting?  
 6 A. Yes, I was asked to do that when, in the absence of the  
 7 CEO, that — on behalf of the company, to take  
 8 responsibility for the fact we had completed our process  
 9 to our satisfaction and to add my name to the  
 10 certificate in her absence.  
 11 Q. When you did that, did you yourself undertake any checks  
 12 or spot checks of the underlying data to verify for  
 13 yourself that what you were signing was true and  
 14 accurate?  
 15 A. If I had any queries, I would want to see the staff  
 16 members involved. I can't remember what used to  
 17 particularly catch my eye or ear, if anything, but  
 18 I could invite and seek any views that I thought  
 19 appropriate based upon the certificate. Usually how  
 20 long — if things had taken a long time, why they'd  
 21 taken a long time, et cetera. So I had discretion to  
 22 ask; I did. But I did not go and bring big bundles of  
 23 documents into my office and pore through them all.  
 24 I wanted to satisfy myself that our process had been  
 25 followed, but I never, to the best of my recollection,

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1 got hold of core — big bundles of core documents.  
 2 Q. Were the people who brought you the certificates to sign  
 3 in your capacity you have described Brian Chamberlain,  
 4 Simon Wroe and Ramona Donnelly, during the respective  
 5 dates you have given us?  
 6 A. Yes, but not all would be signed by any one of the  
 7 three. Mr Chamberlain, when he was no longer the head  
 8 of that department, he moved into a technical advisory  
 9 role alongside the chief scientist, a gentleman that  
 10 I mentioned earlier, so he too would have an expert role  
 11 as an additional head of a department, because he had  
 12 unique knowledge and skills. So sometimes he would sign  
 13 certificates as being the competent technical manager,  
 14 and it may not be Mr Wroe or Ms Donnelly who would sign  
 15 those.  
 16 Q. Who normally would bring the unsigned final certificate  
 17 to the chief executive or in your case as deputy, the  
 18 operations director, to sign?  
 19 A. There was another department that specialised in the  
 20 preparation of these certificates, grammar,  
 21 wordsmithing, the layout, any photographs. They were  
 22 called the publications department, and they had a to  
 23 and fro role between the technical team in terms of  
 24 making sure that all aspects of the certificate had been  
 25 covered off, and they had a checklist, which I think was

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1 called a traveller log, of things that were required and  
 2 ticked off and who had approved which, and what would be  
 3 delivered to me would — by this publication department,  
 4 would be the draft certificate and this checklist called  
 5 the traveller log.  
 6 Q. I see.  
 7 This publications department, would that get  
 8 involved in the primary drafting of the certificate by  
 9 the project manager responsible for it?  
 10 A. I don't think the primary drafting, because quite a lot  
 11 of the document was in some ways templated, you know,  
 12 there was footers and headers, et cetera. But, no, the  
 13 project — the technical people were responsible for the  
 14 technical content of the document, because the  
 15 publication staff were not technically qualified to do  
 16 that. They would just make sure the formatting — and  
 17 then there was a fair bit of toing and froing to the  
 18 client as well, you know, the client doesn't like  
 19 something, the photograph is the wrong one, or  
 20 somebody's name's changed, et cetera.  
 21 So there would be some toing and froing between the  
 22 BBA and clients via this publications department, but  
 23 they had no remit to make technical decisions or make  
 24 technicality alterations to the certificates.  
 25 Q. Yes.

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1 I want to turn next to your knowledge and  
 2 experience.  
 3 Were you required to have any knowledge of  
 4 construction materials in order to be able to perform  
 5 your role either as operations director or as deputy  
 6 CEO?  
 7 A. No.  
 8 Q. Did you have any expertise or experience in respect of  
 9 the certification of building products?  
 10 A. No.  
 11 Q. Were you required to have any knowledge of UK  
 12 Building Regulations?  
 13 A. I wasn't required to, no, but of course as part of my  
 14 role, you know, every day I was coming in contact with  
 15 this and, of course, gained some knowledge, but I do not  
 16 appear before the Inquiry today claiming to have  
 17 technical knowledge such that I would like to argue with  
 18 a scientist or an engineer.  
 19 Q. No.  
 20 Did you become familiar with Approved Document B  
 21 forming part of the Building Regulations, Approved  
 22 Document B concerning external fire spread on buildings?  
 23 A. Could you just repeat the first part of your question?  
 24 I'm sorry.  
 25 Q. Yes, I'll put it slightly differently.

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1 Did you, during your time at the BBA, become  
 2 familiar with Approved Document B, which concerns  
 3 external fire spread on buildings?  
 4 A. Become familiar? I certainly looked at it and read it,  
 5 but I would not claim that I had a deep understanding of  
 6 all its applications and implications. But I did look  
 7 at it, read it, and try to assimilate it where it was  
 8 relevant to what I was being asked to consider, if  
 9 anything.  
 10 Q. Yes. Did you ever have any formal training on the  
 11 contents of Approved Document B?  
 12 A. No.  
 13 Q. Would it follow that you didn't have any training on the  
 14 UK national standard testing regime, the BS 476 testing  
 15 regime?  
 16 A. No, I did not have formal training.  
 17 Q. Did you have any knowledge gained from experience about  
 18 that regime?  
 19 A. As my previous answer, it was — yes, I did read it,  
 20 I did look at it, I tried to understand it, and  
 21 of course it would be being discussed regularly in my  
 22 presence, particularly if there was some issue of the  
 23 day regarding it, but I always would take the advice of  
 24 those I believed had the expertise.  
 25 I would challenge, you know, my job was to,

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1 you know, "Is there a risk here?", is to challenge, to  
 2 ask those simple questions why, how, et cetera, and  
 3 elicit a logical response where possible.  
 4 Q. Do you remember how soon after you joined the BBA in  
 5 October 2014 you read the British Standard 476 testing  
 6 regime?  
 7 A. It certainly wasn't within the first — certainly wasn't  
 8 in 2014, having joined there in October, but certainly  
 9 from, say, the Christmas period at the end of 2014  
 10 onwards I was, yes, of course trying to assimilate  
 11 myself into the role.  
 12 Q. Right.  
 13 Do you remember what it was that prompted you to go  
 14 and look at BS 476?  
 15 (Pause)  
 16 A. I can't remember anything specific. I don't think there  
 17 was a specific event or issue, it was just — you know,  
 18 it was just something that I felt I should know more  
 19 about.  
 20 There was also other things, it wasn't just about  
 21 fire. The — another major area was, of course, things  
 22 that could fall off buildings, windloading and various  
 23 things like this which were also significant,  
 24 durability. So I just tried to read my way into it.  
 25 But I can't remember — to your question, I can't

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1 remember a specific incident or event that took me to  
 2 "I must urgently read this document".  
 3 Q. I see.  
 4 Does the same also apply in relation to the European  
 5 fire testing and classification regime?  
 6 A. Yes, I think it would be a similar approach. There was  
 7 the British — forgive me, not British, the England and  
 8 Wales approach, and there was — it wasn't the same, but  
 9 it was acceptable under the Euro classifications. They  
 10 were different tests, but they were — they each could  
 11 satisfy the requirements of the approved documents  
 12 within the Building Regulations, as I recall. I was  
 13 interested to try and understand that better.  
 14 Q. Yes. You were interested to try and understand that  
 15 better. When exactly, to the best of your recollection,  
 16 did you become interested to try to understand that  
 17 better?  
 18 A. I can't — forgive me, I can't put a date on it, it was  
 19 just part of my role.  
 20 Q. Right.  
 21 A. There were many things about assessment, testing, audit,  
 22 inspection that I wanted to know more about.  
 23 Q. Right.  
 24 Did you do research on the side in your own time  
 25 into the UK national testing, England and Wales,

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1 Scotland, Northern Ireland, and the European testing for  
2 fire?  
3 A. I can't — I was working at least six days a week, long  
4 days, and I can't say whether it was in my own time or  
5 work time that I tried to assimilate this, but at some  
6 period during the working week I was, yes, just trying  
7 to become more knowledgeable.  
8 Q. Thank you.  
9 Now, did you become aware, looking at the European  
10 regime, of the meaning of the classifications A through  
11 to F?  
12 A. Erm ...  
13 Q. A being at the top end of the range and F being at the  
14 bottom.  
15 A. Yes, again, forgive me, it's quite a long time ago, but  
16 yes, clearly there was a differentiation between them.  
17 Q. Now, I would like to ask you one or two questions about  
18 training more specifically.  
19 Can we please go to {BBA00010762}. This is a bundle  
20 of presentations which we understand were given at the  
21 BBA, and you can see that they bear the BBA logo.  
22 On page 1, you can see a presentation entitled  
23 "Fire", and if we look at page 5 {BBA00010762/5},  
24 please, we can see what appears to be a handout that  
25 goes with this presentation. At the top you can see the

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1 date, 2011.  
2 It's very small on your screen, Mr Moore. I would  
3 like it to be expanded so you can see it more clearly.  
4 Can you see at the top —  
5 A. Yes.  
6 Q. — it says "Fire presentation — 2011 — updated  
7 December 2012"; yes?  
8 A. Yes.  
9 Q. Just pausing here, is this a document you're familiar  
10 with?  
11 A. I've got no specific recollection of it.  
12 Q. Very well. Let's see how we go.  
13 If we go to page 7 {BBA00010762/7}, we can see  
14 another presentation, and you can see in the top  
15 left-hand corner a red and blue logo, triangle. In the  
16 red part it says "Fire safety — Part B and Fire  
17 Presentation", and in the blue part it says:  
18 "Jon Denyer  
19 "Principle[sic] Scientist  
20 "Nisha Sharma  
21 "Project Manager and Tech Co-ordinator — Fire  
22 "26th April 2016."  
23 Is that a document or the beginnings of a document  
24 that rings a bell with you?  
25 A. Firstly, can I just allude to a previous answer,

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1 Mr Denyer is that senior scientist I was referring to.  
2 Forgive me, I had a moment where I forgot his surname.  
3 That's a helpful prompt. And I was aware that  
4 Nisha Sharma had this liaison role between the BBA and  
5 one of the test — fire test establishments, which  
6 I think might have been Exova. So this seems more  
7 familiar, but I can't be sure that I have seen this  
8 document before.  
9 Q. Thank you.  
10 A. It's possible, but I can't recall it.  
11 Q. Let's go to page 15 {BBA00010762/15}, and we can see  
12 there at the top it says:  
13 "Fire safety part B and fire presentation — 2016."  
14 It's said to be:  
15 "... part of Fundamentals Training Programme which  
16 commenced in February 2016. All PAC staff with less  
17 than three years' experience at the BBA are required to  
18 attend, in addition to staff working in the area under  
19 consideration."  
20 Then it says:  
21 "This presentation has been extended to include  
22 Fire, which was provided to all PAC staff as part of the  
23 training sessions held during 2011."  
24 Now, Mr Moore, I don't think you were — well, you  
25 weren't — at the BBA in 2011, but do you know who would

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1 have had to have attended the presentations in 2011 and  
2 2012?  
3 A. I don't know.  
4 Q. Now, you were operations director when the 2016 training  
5 was introduced, weren't you?  
6 A. Yes.  
7 Q. Do you know what prompted the BBA to institute this  
8 training programme?  
9 (Pause)  
10 A. No, I don't know. Or I can't remember. I'm not sure  
11 which.  
12 Q. Do you know what is meant in this document by PAC staff?  
13 A. Yes. That's the sort of — that's the assessment and  
14 certification staff. Product assessment and  
15 certification. These are the staff — the project  
16 managers principally, that refers to.  
17 Q. Yes, I see.  
18 Do you remember whether you attended this  
19 presentation yourself?  
20 A. I don't have a specific recollection, but that front  
21 sheet, certainly Ms Sharma's role, does look really  
22 quite familiar to me, but I can't be sure.  
23 Q. You said Ms Sharma's role. You mentioned earlier on  
24 that she was connected — and maybe I've misunderstood  
25 this — in some way with Exova.

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1 A. Yes.  
 2 Q. Could you explain?  
 3 A. Yes. From recollection, the BBA paid a small or modest  
 4 retainer to Exova, and through — so if there were  
 5 enquiries or generic requirements outside of project  
 6 management specifically, through — Ms Sharma was the  
 7 liaison point around that. So the expectation, as  
 8 I recall it, was: if a project manager had an issue  
 9 generically about fire, or the chief scientist,  
 10 Ms Sharma was the conduit to approach the fire house for  
 11 this generic advice. It was an ongoing — I think it  
 12 had been going for a number of years, that a small  
 13 retainer was paid for advice.  
 14 Q. If you could go back, please, to page 12  
 15 {BBA00010762/12}, there's just something on that page  
 16 I want to pick up with you.  
 17 At the foot of page 12, you can see that there is  
 18 a set of details of fire test organisations, and there  
 19 you have Exova Warrington, Andy Kearns, and BRE Global,  
 20 Stephen Howard, and underneath that it says:  
 21 "The BBA has a consultancy agreement with Warrington  
 22 whereby, under a monthly fee arrangement, advice is  
 23 available free of individual charge. As a result,  
 24 Warrington should always be consulted before BRE,  
 25 although BRE can carry out certain tests that Warrington

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1 do not offer.  
 2 "There is a BBA/Exova Warrington Query Form which is  
 3 available on the intranet under Technical Forum tab in  
 4 the reference library. This document should be  
 5 completed as fully as possible and sent to Nisha Sharma  
 6 for forwarding to Exova for their opinion."  
 7 Now, that's there. Does that accurately summarise  
 8 the arrangements that the BBA had at this time,  
 9 April 2016, with those two organisations?  
 10 A. That seems — what you've just read out and what I've  
 11 just read, it seems consistent with my memory of that  
 12 time, because I think I articulated something not as  
 13 concise as that but quite similar, I think.  
 14 Q. Yes.  
 15 A. Yes.  
 16 Q. Were those the standing arrangements that existed when  
 17 you arrived at the BBA in October 2014, do you remember?  
 18 A. I'm not sure. I can't be certain.  
 19 Q. Right.  
 20 Do you know what the arrangements were with the BRE,  
 21 so that if somebody wanted advice from the BRE, what  
 22 arrangements would govern the giving and taking of that  
 23 advice?  
 24 A. Well, you've noted earlier, when I relied upon my  
 25 memory, I didn't have reference to BRE Global in my

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1 memory, I only have a recollection of Exova Warrington.  
 2 So I am not sure about the BRE Global, even having read  
 3 it now. I'm not sure whether that was part of the  
 4 arrangements when I joined the BBA or subsequently. So  
 5 I'm not clear about that.  
 6 Q. Right.  
 7 Are you able to tell us anything about what  
 8 arrangements might have existed as between the BBA and  
 9 the BRE whereby the BBA could take advice from the BRE,  
 10 particularly Stephen Howard, who is identified here as  
 11 the contact point?  
 12 A. No. I mean, they were on the same location as us, but  
 13 I don't — I'm not aware of formal or financial —  
 14 a contractual relationship between the BBA and BRE  
 15 regarding fire. As I've stated, I did remember this  
 16 consult — it's better worded than I just explained, but  
 17 a consultancy agreement, I've called it a small  
 18 retainer, I remember that, but I'm not aware of  
 19 a similar financial arrangement, contractual, with  
 20 BRE Global.  
 21 Q. Thank you.  
 22 More broadly on the subject of training, during your  
 23 time at the BBA, were there any training requirements or  
 24 any regime in place for project managers?  
 25 A. When a project manager — so the numbers were relatively

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1 small of project managers in the teams, probably 20 or  
 2 so, 20 plus staff in each team, so we didn't have large  
 3 influxes of staff and large outgoings of people leaving.  
 4 So the approach was, when someone was inducted into the  
 5 BBA, their qualifications, their background, their  
 6 skillset and experience, as against the vacancy where it  
 7 arose, tried to recruit to that position, and then the  
 8 process was to have hands-on, side-by-side training next  
 9 to a more experienced peer and manager to assess their  
 10 progress.  
 11 Now, that was the position from when I joined, 2014,  
 12 and more — in approximately 2017, an HR manager with  
 13 a training background was recruited, and in 2018 or 2019  
 14 an actual learning and development manager was inducted.  
 15 Again, this was to more formalise the training of staff  
 16 as they were onboarded. But for the bulk of my time at  
 17 the BBA, it was hands-on support to an individual  
 18 joining.  
 19 Q. I see. So, in a word, learning on the job?  
 20 A. Yes, largely. The first year, however, the first year  
 21 or so was pretty much predominantly given over to  
 22 learning.  
 23 Q. Right.  
 24 A. So over time, over year 2, the balance of them  
 25 understanding the background, the norms, the way the

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1 organisation worked, they gradually moved into a more  
2 operational capacity. So certainly the first six months  
3 and probably up to a year, the balance was more towards  
4 their induction, understanding of their — of the  
5 environment and the products that they would be working  
6 in.

7 Q. And what about team managers and technical heads or  
8 heads of approval, did they have ongoing or continuing  
9 professional education or development?

10 A. The BBA offered anybody, everybody, charterships. By  
11 that I mean affiliations to professional bodies for  
12 ongoing training, and there was a budget set aside each  
13 year to pay the fees for staff. You'll probably have  
14 noticed — seen the email footers of BBA staff, normally  
15 there's a fellowship or a chartership, so the BBA was  
16 investing in their professional chartered development as  
17 they went along.

18 In terms of management experience, yeah, when  
19 I arrived there, I was not convinced that the managers  
20 had had formal management training, so an external  
21 provider of management training was identified, I think,  
22 in 2015 into 2016 to provide a more structured approach  
23 to learning requirements for managers.

24 Q. Right.

25 Going back to an answer you gave us before about

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1 project managers, people coming into the organisation in  
2 a junior role —

3 A. Yes.

4 Q. — you said that "over time, over year 2, they gradually  
5 moved into a more operational capacity", but during  
6 year 1 that was, you said, "pretty much predominantly  
7 given over to learning".

8 Would you expect a project manager who had joined  
9 the organisation in, say, September 2014 and the  
10 cladding department in November 2014 to be given the job  
11 of reviewing an existing certificate as one of the first  
12 jobs in that role?

13 A. Again, it depends. It depends on the individual and  
14 their background, it depends upon the relative  
15 complexity of the case, it depends how much side-by-side  
16 support they had from someone. But generally it was  
17 expected to be, generally, a relatively, you know,  
18 induction-based, easy steps approach as their knowledge  
19 grows about the products and the organisation. So  
20 of course there are always exceptions, but that was the  
21 approach about getting people inducted and trained,  
22 which was the norm.

23 Q. Would it be normal for somebody to be given the task of  
24 project manager reviewing an outstanding certificate for  
25 a product within the first month or two of arriving at

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1 the BBA?

2 A. Again, it would depend upon the individual and their  
3 experience and the complexity of the project and the  
4 support that they had around them to do that. But  
5 generally, generally, it was expected they would do  
6 simple tasks that would be to train them, generally.  
7 You know, if there are exceptions then they would be  
8 exceptions.

9 Q. Young science graduate in their second job, maybe  
10 three years out of university. In that situation, would  
11 you expect them to be given the project manager role of  
12 reviewing an outstanding certificate within the first  
13 few months of their arrival at the BBA?

14 A. Again, for the reasons set out, it wouldn't be ideal,  
15 but again, it would depend — you know, it will depend  
16 on a number of circumstances. But, you know, getting  
17 people to do things beyond their capacity or capability  
18 is not what any responsible organisation would prefer to  
19 do.

20 Q. During your tenure at the BBA, was there any specific  
21 training given, either internally or externally, to  
22 project management staff or team managers on the  
23 Building Regulations, the approved documents,  
24 fire testing or the writing of certificates?

25 A. There ... yes. The — as I mentioned, the principal

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1 scientist, the heads of department, the team managers,  
2 would arrange training events, training days for their  
3 staff as they thought would be needed in that team. So,  
4 yeah, there was a lot of time at the BBA given over to  
5 people doing training, a considerable amount given over  
6 to this.

7 Q. Was there a formal requirement for staff to maintain  
8 CPD, continuing professional development, on a periodic  
9 basis, such as annual?

10 A. Where they had applied for or had undertaken  
11 a chartership or a fellowship, which was the route that  
12 the BBA encouraged, then yes.

13 Q. What was that requirement?

14 A. It would vary according to the fellowship or the  
15 chartership. In order — it's my understanding, I may  
16 be wrong, that there are certain requirements that one  
17 has to fulfil to maintain a chartership or a fellowship.

18 Q. I see. So the training that they got would depend on  
19 whether they were chartered or fellows of other  
20 organisations?

21 A. Not wholly, but that was certainly a part of the  
22 training environment that they're working in, and, as  
23 I say, it would depend on their skills, their  
24 experience, the matters they had a particular interest  
25 in or penchant for, their manager's assessment of their

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1 capabilities, the head of department's view, and then  
 2 trying to provide them the support, the training  
 3 support, that they needed.  
 4 Q. Yes, but going back to my question: was there actually  
 5 a formal requirement for staff to maintain CPD on  
 6 an annual basis, or any basis?  
 7 A. Erm ... outside my answer, no.  
 8 Q. Right.  
 9 Now, Valentina Amoroso gave evidence yesterday to  
 10 the Inquiry. She told us that when she started her role  
 11 as project manager in September 2014, there was no  
 12 formal training in respect of fire engineering; it was,  
 13 as she said, primarily learning on the job. The  
 14 reference for that is {Day106/13:15}.  
 15 Do you agree with that?  
 16 A. Yes, I've got no reason to doubt that.  
 17 Q. So it's right, is it, that project managers such as  
 18 Valentina Amoroso were given no formal training in  
 19 respect of fire performance at that time, late 2014?  
 20 (Pause)  
 21 A. I agree with that.  
 22 Q. Did that change later?  
 23 A. The reason why I'm pausing slightly is that the BBA did  
 24 not — you know, was not a fire test establishment. We  
 25 did not claim, as far as I am aware, that we were —

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1 this was a field of expertise. The requirement was for  
 2 the client or the — to go to a professional fire test  
 3 laboratory and bring back evidence. But I did expect  
 4 that the BBA project managers and their managers would  
 5 be able to interpret the evidence that they received  
 6 from a fire test house.  
 7 Q. Did you expect that BBA project managers and their  
 8 managers would know what to look for when assessing the  
 9 truth of a claim to fire performance that the client  
 10 wanted to make in its certificate?  
 11 A. Yes, I would expect that. There should be a norm, and  
 12 the role of the project manager and their managers is to  
 13 assess whether the evidence that's been offered and  
 14 provided satisfies the requirements of the norm. So  
 15 I would expect project managers and their managers and  
 16 the scientist and the chief engineer between them to be  
 17 able to come to a decision like that, in —  
 18 Q. Right. So does that —  
 19 A. Yeah, sorry.  
 20 Q. No, sorry, do finish your answer, I cut across you,  
 21 I think.  
 22 A. I think I'd pretty much finished my answer.  
 23 Q. So to that extent, I think we can agree that you did  
 24 expect that staff members in those roles would have fire  
 25 expertise to that degree?

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1 A. Fire expertise to that degree? To be able to read  
 2 a fire certificate and understand what it was saying  
 3 about the product that the project manager was  
 4 assessing, yes.  
 5 Q. Yes, thank you.  
 6 Does it follow from that that a project manager  
 7 drafting an original certificate, whether it's truly  
 8 original or whether it's a confirmation certificate, or  
 9 a project manager reviewing a certificate would know how  
 10 to go about assessing whether a claim for fire  
 11 performance to be made in that certificate was  
 12 justified?  
 13 A. Yes.  
 14 Q. Yes.  
 15 Now, can I then just ask you one or two questions  
 16 about the BBA.  
 17 Is it right to say the BBA operates as  
 18 an independent, self-funding, non-profit distributing  
 19 company?  
 20 A. Yes, that's correct.  
 21 Q. I think it's limited by guarantee, isn't it?  
 22 A. Yes.  
 23 Q. Yes.  
 24 Did the BBA rely on its income from clients entering  
 25 into contracts to obtain certificates?

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1 A. Yes.  
 2 Q. And also from payment of annual maintenance fees in  
 3 respect of those certificates?  
 4 A. Yes.  
 5 Q. So is it right to describe the relationship between the  
 6 BBA on the one hand and its clients on the other as  
 7 commercial?  
 8 A. Yes, that's correct.  
 9 Q. In your time at the BBA, was there a code of conduct or  
 10 other set of guidelines which contained principles of  
 11 impartiality and how to deal with conflicts of interest?  
 12 A. Yes, the UKAS — the requirement from the  
 13 UK Accreditation Service, and this standard that I think  
 14 I mentioned, 17065, required this. The duties upon the  
 15 company directors as well to avoid not only personal  
 16 conflicts of interest, but also conflicts of interest  
 17 for the company, were part of our roles and  
 18 responsibilities, something that I took particularly  
 19 seriously.  
 20 Q. Yes.  
 21 Looking at career progression for a moment, was  
 22 there any criteria for pay increases for staff at the  
 23 project manager or team leader level?  
 24 A. It's a combination of things. It became more formalised  
 25 later on, 2017 — no, 2018/2019, but it was

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1 a combination of their experience, their — the breadth  
2 of work that they could take on, were they very niche  
3 and narrow — it could be a good thing — or could they  
4 handle a different variety of products? So there was no  
5 bonus scheme, there was nothing to incentivise in that  
6 way. It tended to be experience, time progression and  
7 the amount of responsibility that the person adopted  
8 through their experience, tended to be linked to  
9 an annual review of their salary, and assessment by  
10 their managers.

11 Q. Yes, I see.

12 Were individual staff members, such as project  
13 managers or team leaders, set targets of any kind?

14 A. In terms of their productive time, yes, an amount of  
15 hours per year, which was expected to be productive, ie  
16 fee earning or undertaking other important issues.  
17 Yeah.

18 Q. And how many hours per year would a project manager be  
19 expected to clock up?

20 A. Again, it would vary according to the individual, their  
21 experience, the kind of work that was in the team.  
22 A new person, as I said before, maybe a small number of  
23 hours in their first year. The very top—end people, 700  
24 or 800 hours of productive time, fee earning time per  
25 year. In a range — so in other words in a range from

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1 a small number up to hundreds of hours.  
2 Q. Yes, and it was your job, I think as you told us  
3 earlier, to make sure that your staff were as productive  
4 as reasonably possible?  
5 A. Yeah, the word — yes, the operable word being  
6 "reasonable", yes.  
7 Q. Yes.  
8 Now, you mentioned earlier an interest in  
9 whistleblowing. If a member of staff during your time  
10 at the BBA had become aware of a problem which they had  
11 come across during the course of their work, was there  
12 a procedure in place at the BBA to be able to report  
13 that problem without fearing any repercussions?  
14 A. There was, yes, a formal whistleblowing policy in the  
15 business through the HR department, but a range of other  
16 approaches as well to make sure that these kinds of  
17 things were escalated if it was causing concern to  
18 staff.  
19 Q. Given that you were operations director, would you have  
20 been involved in the reporting and investigation process  
21 arising out of such concerns?  
22 A. It would very much depend what it was. If it was  
23 something about me, then no, but if it was more generic  
24 than that, then of course I would like to be, but  
25 a judgement would be made about how best to proceed.

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1 I remember my main concern was external  
2 whistleblowing, which I would like to say more about if  
3 the Inquiry would allow me at some point, but  
4 whistleblowing would be an internal dimension as well.  
5 Q. Do you remember whether any concerns were ever raised,  
6 either through the whistleblowing procedure or  
7 otherwise, about the certification of ACM, aluminium  
8 composite material panels, or insulation materials?  
9 A. Erm ... yes. Yes, I do.  
10 Q. Could you tell us a little bit more about that, please?  
11 A. Yes. A member of the sales staff — this would have  
12 been after the fatal fire at Grenfell Tower, probably  
13 into 2018, a member of the sales staff raised concerns  
14 about his understanding of panels and the BBA's approach  
15 thereto.  
16 Q. Yes, I see. Was that in relation to a UKAS visit?  
17 A. Yes, it — putting two and two together, a UKAS visit  
18 arose fairly shortly after the colleague or the former  
19 colleague raised his concern. So I hope I'm not jumping  
20 to conclusions saying the two things were linked, but it  
21 was temporally close to a UKAS visit.  
22 Q. Yes, I see.  
23 Did that member of staff challenge or criticise the  
24 BBA's position relating to the Reynobond  
25 BBA certificate?

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1 A. Yes.  
2 Q. And what was the nature of that challenge?  
3 A. Again, I can't remember the specifics of it. It was  
4 dealt with by another director, the commercial director,  
5 and the head of approvals, Mr Albon, met with this  
6 member of staff to discuss his concerns.  
7 The outcome that was fed back to me was there was  
8 a difference of view about the BBA's approach, and,  
9 yeah, you know, the more experienced — the scientist,  
10 Mr Albon, had listened carefully and given a view, the  
11 non—technical salesperson had a different view, and  
12 I think the outcome was that, you know, the scientist's  
13 view was reasonable and matters were left there, though  
14 I think matters were escalated by the colleague  
15 elsewhere, possibly to the media.  
16 Q. Right.  
17 You say there was a difference of view. Very  
18 briefly, can you tell us what that difference of view  
19 was?  
20 A. I can't recall the detail of it, and I'm not sure I was  
21 ever really, really closely sighted on the detail.  
22 Q. Can you remember what Mr Albon said to you?  
23 A. Erm ... I can't remember specifically. He had — they  
24 had sat down for a length of time with a colleague  
25 director there, they had exchanged, you know, the

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1 concerns, views, what the concerns were, and Mr Albon  
 2 said, "I can't see merit in these concerns". He felt  
 3 the colleague didn't understand the application of the  
 4 norm to the situation, words to that effect.  
 5 Q. Can you give us, even in outline, the basic gist of the  
 6 point?  
 7 A. I can't, I'm sorry.  
 8 Q. What was the topic? Was it fire? Was it water ingress?  
 9 What was it?  
 10 A. If it was related to ACM, it must have been in relation  
 11 to fire, I'm deducing. It certainly wasn't durability.  
 12 It must have been something about fire, but I'm not  
 13 certain.  
 14 MR MILLETT: Yes, thank you.  
 15 Mr Chairman, I know we have had a bit of  
 16 an interruption, but it's a convenient moment for  
 17 a break because I'm about to go on to a reasonably  
 18 lengthy single topic.  
 19 SIR MARTIN MOORE-BICK: Yes. Well, it would be sensible to  
 20 have a break at this point, then, wouldn't it?  
 21 Mr Moore, I did warn you we're going to have a break  
 22 in the middle of the afternoon. We will come back and  
 23 resume at 3.35, please. In the meantime, I have to ask  
 24 you not to talk to anyone about your evidence or  
 25 anything relating to it. All right?

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1 THE WITNESS: Understood, Mr Chairman, yes.  
 2 SIR MARTIN MOORE-BICK: See you in a moment, then.  
 3 Thank you very much.  
 4 (3.20 pm)  
 5 (A short break)  
 6 (3.35 pm)  
 7 SIR MARTIN MOORE-BICK: Welcome back, everyone. We are now  
 8 ready to continue with Mr Moore's evidence.  
 9 Mr Moore, can I just check that you can see me and  
 10 hear me clearly?  
 11 THE WITNESS: Yes, I can.  
 12 SIR MARTIN MOORE-BICK: Good. Thank you very much.  
 13 Well, then, I take it you're ready to continue, so  
 14 I'll ask Mr Millett to carry on with the questions.  
 15 Yes, Mr Millett.  
 16 MR MILLETT: Yes, thank you, Mr Chairman.  
 17 Mr Moore, I would like now to turn to a different  
 18 topic, namely Kooltherm K15 insulation manufactured by  
 19 Kingspan.  
 20 I'm going to ask you some questions about issue 1 of  
 21 the BBA certificate number 08/4582 dated  
 22 27 October 2008. Can we please have that up on the  
 23 screen. It's at {BBA00000038}.  
 24 You can see from what's on the screen in front of  
 25 you that this is that certificate, and the date is at

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1 the bottom of the screen, together with the signatures  
 2 of those who approved it at the time.  
 3 Just so that you and I are clear at the outset, of  
 4 course, you only joined the BBA in October 2014, so you  
 5 can have had no involvement in any aspect of the  
 6 assessment or certification of this product in 2008 or  
 7 the review of this certificate in the years that  
 8 followed. That must be right, mustn't it?  
 9 A. That's correct.  
 10 Q. Yes. When did you first see this certificate?  
 11 A. I can't remember. Certainly at the time when  
 12 the Inquiry was requesting information from the BBA,  
 13 which would be after the Inquiry was established, so  
 14 2018, possibly into 2019.  
 15 Q. The reason I'm asking you questions about it, or I'm  
 16 going to, is that you have offered evidence about it to  
 17 the Inquiry in your second witness statement of  
 18 18 November 2020, which we're going to come to. So  
 19 that's why I'm asking you about it.  
 20 Now, just looking at the document on the screen, you  
 21 can see that it's a certificate for Kingspan K15. If we  
 22 scroll to the top of the page, you will see the product.  
 23 It's Kooltherm K15 rainscreen insulation board.  
 24 Under the heading, you can see that there is a blue  
 25 shaded box that gives the product's scope. Can you see

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1 that?  
 2 A. Yes, I can.  
 3 Q. It says:  
 4 "This Certificate relates to Kooltherm K15  
 5 Rainscreen Insulation Board, a rigid phenolic board with  
 6 foil composite facings, for use as external thermal  
 7 insulation on new and existing steel frame or masonry  
 8 walls. The board is used in domestic and non-domestic  
 9 buildings in conjunction with masonry or weathertight  
 10 ventilated cladding systems."  
 11 Does that description accord with your understanding  
 12 of this product?  
 13 A. Can I make it clear that my knowledge of this product is  
 14 only that which I've put into my witness statement. My  
 15 witness statement in November 2020 was to act — my role  
 16 was to act as the locator, collator and provider to  
 17 the Inquiry of material it wanted in its requests, that  
 18 they wished to see. So, to the best of my knowledge,  
 19 I haven't expressed a technical opinion about the  
 20 product at all, and I'm not convinced that I'm qualified  
 21 to do so.  
 22 As I say, if I can be clear that I understood my  
 23 role was to make material available to the Inquiry,  
 24 rather than to try to give a technical opinion about it.  
 25 Q. I understand that, and I'm grateful for that

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1 clarification . We are going to look at your statement  
 2 on this subject.  
 3 I should just say that the reason I'm asking you,  
 4 Mr Moore, rather than anybody else is that nobody of  
 5 whom we've asked detailed questions about the  
 6 certificate at the BBA has been able to give any answers  
 7 at all apart from you, and the answers that you have  
 8 given are those that appear in your second witness  
 9 statement. So you can understand, I hope, why I'm  
 10 asking you questions about it.  
 11 But given the qualification you have made,  
 12 of course, and we understand that, bear with me and see  
 13 if you can answer my questions, and if you can't, you  
 14 can't, but let's see how we go, shall we?  
 15 I've shown you the scope.  
 16 If we look a little bit lower down page 1, you can  
 17 "Key factors assessed"; yes?  
 18 A. Yes.  
 19 Q. Under that you can see, under the third bold heading,  
 20 "Behaviour in relation to fire"; yes?  
 21 A. Yes.  
 22 Q. Then it says this:  
 23 "The boards will not contribute to the development  
 24 stages of a fire or present a smoke or toxic hazard (see  
 25 section 7)."

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1 Have you, as you sit there today, any understanding  
 2 about what that phrase means, when it says "The boards  
 3 will not contribute to the development stages of  
 4 a fire"?  
 5 A. Well, without reference to section 7, taking the words  
 6 as they are written, the meaning appears to be clear:  
 7 the boards will not contribute to the development stages  
 8 of fire . So that's what it appears to say, that's what  
 9 I understand it to mean.  
 10 Q. All right. Well, we'll explore that in a little bit  
 11 more detail in a moment.  
 12 Do you know who historically had proposed that  
 13 specific wording for this certificate as a result of  
 14 your researches?  
 15 A. No. I think the request from the Inquiry was to  
 16 identify, I think, everybody who had been involved in  
 17 the process. I may be incorrect about that. That's  
 18 what I understood, and therefore, you know, to offer,  
 19 from the HR department, a list of the names that we  
 20 think had been involved in this process. So if that  
 21 process is right, it would seem it's one of the people  
 22 in that list. But I can't tell the Inquiry who it was  
 23 who would have put that wording in there.  
 24 Q. Right. Does it follow that you don't know whether, and  
 25 if so how, that language is taken from any guidance or

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1 the Building Regulations or any particular test  
 2 standard?  
 3 A. No, I don't. It's not wording that I've seen before  
 4 used in the context of other certificates that I have  
 5 seen, for example.  
 6 Q. Right.  
 7 Do you know what was the scientific or evidential  
 8 basis for the statement that the boards will not  
 9 contribute to the development stages of a fire?  
 10 A. No, I don't.  
 11 Q. Do you know how contribution to the development stages  
 12 of a fire would be measured?  
 13 A. No.  
 14 Q. Do you understand K15 to be a combustible phenolic  
 15 insulation material?  
 16 A. Only to the extent that I know from what I've heard,  
 17 of course, that it was one of the materials that burned  
 18 at the tower, and therefore it must have had some degree  
 19 of combustibility. But I don't know any more detail  
 20 than that, to be candid with you.  
 21 Q. Given that, as you say, it burns, do you know, can you  
 22 help us, how it could be at all accurate to say that the  
 23 boards will not contribute to the development stages of  
 24 a fire?  
 25 A. I can't help the Inquiry with that.

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1 Q. Can we look at Chris Hunt's statement, please. You can  
 2 see his name at the bottom of the page there as the  
 3 person who, as head of approvals, signed off this  
 4 certificate. His statement is at {BBA00011087/13} and  
 5 I would like to show you paragraph 60.  
 6 If we go up, please, to the bottom of page 12  
 7 {BBA00011087/12}, we can see that there is a set of  
 8 questions which start at — or question 26 at the foot  
 9 of page 12. Mr Hunt is asked this:  
 10 "In relation to the following statement 'the boards  
 11 will not contribute to the development stages of a fire'  
 12 (found at page 1 of the Certificate):  
 13 "a. Who provided this wording?"  
 14 Answer, paragraph 58 {BBA00011087/13}:  
 15 "I don't know.  
 16 "b. Who checked and/or authorised the inclusion of  
 17 this wording?  
 18 Answer, paragraph 59:  
 19 "I have had sight of the certificate traveller log  
 20 [CH5] and the individuals names are present.  
 21 "c. What is the statement intended to mean?  
 22 "60. I don't know but I would refer to my answer to  
 23 question 26(e) below."  
 24 Now, just pausing on the "I don't know", does that  
 25 concern you at all?

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1 A. Yes, it does. It does. Obviously a lot of time has  
 2 passed, and I don't know what Mr Hunt may have seen or  
 3 not seen, but that is an answer that is surprising .  
 4 Q. Yes.  
 5 Now, looking at paragraph e, which is underneath 61,  
 6 the question that's asked of him is:  
 7 "What is the evidential basis for the statement?  
 8 Please give full details of all and any material relied  
 9 on to make this assertion and provide references, where  
 10 necessary, to any relevant test or standard."  
 11 His answer is:  
 12 "I don't remember, but I recall the page 1 content  
 13 was intended as a summary from the sections within the  
 14 body of the certificate . The summary directs the reader  
 15 to section 7, where full details are given."  
 16 That doesn't help, does it, in enlightening us as to  
 17 what that expression means?  
 18 A. I would agree. Taken literally , unless there's some  
 19 other explanation, the reader could only interpret what  
 20 is written there.  
 21 Q. Do you know and can you help us with whether this  
 22 expression, "will not contribute to the development  
 23 stages of a fire", had come from an early letter from  
 24 the Loss Prevention Council to the BBA in 1994? Does  
 25 that ring a bell with you?

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1 A. No.  
 2 Q. Well, let's see how we go.  
 3 Can we go, please, to {BBA00011287}. This is  
 4 a letter dated 13 July 1994 from the Loss Prevention  
 5 Council in London to the British Board of Agrément, and  
 6 it's addressed to Huw Jenkins.  
 7 You can see that the subject matter of the letter is  
 8 "Kooltherm K8 Cavity Boards". Do you see that?  
 9 A. Yes.  
 10 Q. Now, this letter, Mr Moore, was exhibited to your  
 11 witness statement to the Inquiry dated 18 November 2020,  
 12 your second statement. According to you, this was one  
 13 of the documents on which the assessment of K15 by the  
 14 BBA in 2008 was based. That's right, isn't it?  
 15 A. Yes, it was all the material or included in all the  
 16 material that the BBA was able to locate around which —  
 17 it would only be around this material that a decision  
 18 would have been made. So to that extent, yes.  
 19 Q. Let's see what you say.  
 20 Can we have your second statement up, please, at  
 21 page 4 {BBA00011097/4}. I just want to look with you at  
 22 paragraphs 16 and 17.  
 23 At paragraph 3(m) you are asked the question:  
 24 "Any additional documents relating to technical  
 25 assessment or testing of K15 provided to the BBA by

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1 Kingspan at any audit inspection or meeting."  
 2 And at paragraph 16 you say:  
 3 "16. Instead, the classification for K15 was  
 4 extrapolated from a series of fire reports on similar  
 5 Kingspan phenolic products, including those of similar  
 6 density and facing type.  
 7 "17. Copies of the fire reports are exhibited at  
 8 BM4."  
 9 That's what you say in your statement. As part of  
 10 BM4, you exhibited the letter that we've just been  
 11 looking at from the Loss Prevention Council.  
 12 Can we go back to that, {BBA00011287}, and if we go  
 13 to item 1 on the first page, "Objective":  
 14 "To evaluate test data relating to the above  
 15 system."  
 16 Do you see that?  
 17 A. Yes.  
 18 Q. And the "above system" was K8 cavity boards; yes?  
 19 A. Yes.  
 20 Q. If we go down to page 2 of this letter {BBA00011287/2},  
 21 you can see that in the top half of that page there is  
 22 a reference to the tests that the LPC were evaluating,  
 23 and in the second line it says that the test method  
 24 there was BS 476—6:  
 25 "A sample of Kooltherm K9, a CFC free phenolic foam

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1 with a glass tissue faced top surface and a foil faced  
 2 base surface."  
 3 And it explains the results there, and then  
 4 underneath that, "Test method: BS 476: Part 7: 1987",  
 5 a sample of Kooltherm K9 got a class 1.  
 6 Now, although the assessment is said to be in  
 7 relation to K8 cavity boards, it seems from this that  
 8 the tests under BS 476—6 and 7 were carried out on  
 9 a different product, namely Kooltherm K9. Do you see  
 10 that?  
 11 A. Yes, I do.  
 12 Q. When you were investigating this and exhibiting this  
 13 letter to your witness statement to support the  
 14 extrapolation to which you were referring, did you  
 15 notice that fact?  
 16 A. I noticed K8 and K9, but I don't think I made the  
 17 distinction that you've just made in — as you've just  
 18 explained it.  
 19 Q. Now, the section I want you to look at is at page 3  
 20 {BBA00011287/3} under heading 4, if we can go to that,  
 21 please. The first paragraph there, under the heading  
 22 "Examination of draft certificate", says:  
 23 "Based on the examination of the context of use  
 24 specified in your draft certificate, we do not believe  
 25 that the product will make a significant contribution to

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1 a developing fire. The chances of the material being  
 2 accidentally ignited during use is remote, but if it  
 3 does become exposed to an ignition source, such as  
 4 a plumbers torch, fire is unlikely to be propagated.”  
 5 Then it goes on to say:  
 6 “This takes into account the known flammability  
 7 characteristics of Phenolic foam, also that within the  
 8 cavity of a conventional wall, there is unlikely to be  
 9 a sufficient supply of oxygen to support combustion.”  
 10 Looking at the words I emphasised in the second and  
 11 third lines, “we do not believe that the product will  
 12 make a significant contribution to a developing fire”,  
 13 do you agree that that wording bears a strong similarity  
 14 to the wording that we have just been looking at on  
 15 page 1 of issue 1 of the BBA certificate for  
 16 Kooltherm K15 dated 27 October 2008?  
 17 A. Yes, it does appear to be similar.  
 18 Q. Can I ask you what it was that prompted you to exhibit  
 19 this letter to your second statement?  
 20 A. So, as I said, my role was to, on behalf of the  
 21 Inquiry —  
 22 Q. On behalf of the BBA, for the Inquiry.  
 23 A. Sorry, forgive me, for the Inquiry, was to locate,  
 24 collate, assess and provide responses to the Inquiry.  
 25 Q. Who gave you this letter?

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1 A. Erm ... probably Mr Albon. There was —  
 2 Q. So —  
 3 A. — involved in doing this locate/collate exercise, if —  
 4 in respect of our IT systems, it'd be an IT lead. In  
 5 respect of any HR matters, HR lead. In terms of looking  
 6 inside files, Mr Albon. So I would imagine this is  
 7 Mr Albon, but I can't be 100% sure. More likely than  
 8 not Mr Albon.  
 9 Q. Right.  
 10 Was the process of thinking that you needed to  
 11 explain the source of that phrase, and you asked  
 12 somebody to go away and find a document that might  
 13 explain it, Mr Albon found this document and brought it  
 14 back to you and you exhibited it? Now, is that a fair  
 15 summary of what happened?  
 16 A. No, that's distinctly unfair and it is inaccurate.  
 17 So my job was to find any material that could help  
 18 the Inquiry, a task we took very seriously, and make it  
 19 available to you. I have no knowledge of the wording of  
 20 the certificate, I did not ask anybody to do anything  
 21 untoward at all. On the contrary, it's essential that  
 22 the BBA helps this Inquiry get to the bottom of some  
 23 very difficult things.  
 24 Q. Mr Moore, don't get me wrong, I'm not accusing the BBA  
 25 of obstructing the work of the Inquiry, and I'm sorry if

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1 my question came across to you that way. What I'm  
 2 seeking to establish is what the detective work was  
 3 which led to you exhibiting this document.  
 4 Did you instruct Mr Albon or anybody else to assist  
 5 you to get to the bottom of the origins of the phrase on  
 6 page 1 of the BBA certificate?  
 7 A. No, not at all.  
 8 Q. Right. Are you able to enlighten me as to how this  
 9 document was found and why it was thought to be  
 10 relevant?  
 11 A. Anything that could help the Inquiry, you know, spread  
 12 the net as wide as possible to help the Inquiry, was our  
 13 approach. That's what I asked them to do. So it must  
 14 have been in a file or somewhere close to or part of the  
 15 Kooltherm files, K15 or any others, and we just gave  
 16 the Inquiry everything that we had.  
 17 Q. Before you exhibited this document to your second  
 18 statement, did you yourself look at it?  
 19 A. Yes, I remember the name at the top of it, the Loss  
 20 Prevention Council is memorable. In terms of  
 21 understanding its significance, as I say, I want also to  
 22 provide an answer, so the explanation that it was —  
 23 that the extrapolation had come from similar products  
 24 was a deduction, a rational deduction, it would appear,  
 25 as to why — because it was in the same file or close to

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1 the same material as would relate to Kooltherm K15's  
 2 fire classification tests.  
 3 Q. Did you ask yourself when you looked at this document  
 4 why it was relevant?  
 5 A. It would appear to relate to the fire classification of  
 6 the Kooltherm K series and, to that extent, could be  
 7 relevant.  
 8 Q. Right, I see.  
 9 Did you notice that this 1994 letter specifically  
 10 relates to a cavity wall insulation product and not to  
 11 an insulation board for use in an external ventilated  
 12 rainscreen cladding system?  
 13 A. No, I don't think I drew that distinction.  
 14 Q. Going back, if we can, then, to the certificate,  
 15 {BBA00000038/1}, let's look again together at "Key  
 16 factors assessed".  
 17 Do you agree with me that if K15 is indeed, as  
 18 I think you have accepted, a combustible material, the  
 19 statement "The boards will not contribute to the  
 20 development stages of a fire" is inaccurate and  
 21 misleading?  
 22 A. If Kingspan K15 will burn, and will contribute to the  
 23 development stages of a fire, then that is not correct.  
 24 Q. Do you remember, in your time, whether the BBA ever  
 25 received any queries, concerns or complaints in relation

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1 to the use of that expression in this certificate ?  
 2 A. I've no recollection of a complaint being made as you've  
 3 suggested.  
 4 Q. Can we look at page 5 {BBA00000038/5} of this  
 5 certificate next, please. This is section 7, towards  
 6 the bottom of the screen, "Behaviour in relation to  
 7 fire". Can we look at 7.2 at the very bottom of the  
 8 page. It says:  
 9 "The product is classified as Class 0 or 'low risk'  
 10 as defined in the documents supporting the national  
 11 Building Regulations. The product, therefore, may be  
 12 used in accordance with the provisions of:  
 13 "England and Wales — Approved Document B,  
 14 paragraph 8.4, Volume 1 and paragraphs 12.5 and 12.6,  
 15 Volume 2 (see also Diagram 40)."  
 16 Did you yourself, when you signed your statement,  
 17 see any underlying fire test data provided by Kingspan  
 18 to support the claim in this certificate that K15 had  
 19 achieved class 0?  
 20 A. I don't believe so. Anything I saw was in the material  
 21 that I submitted to the Inquiry. I don't believe there  
 22 is anything in there like that.  
 23 Q. No.  
 24 Let's then look at your statement and take this  
 25 a little bit more piecemeal. This is your second

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1 statement, 18 November 2020, at {BBA00011097/4} and can  
 2 we look at paragraph 3(m). It is a request for:  
 3 "Any additional documents relating to technical  
 4 assessment or testing of K15 provided to the BBA by  
 5 Kingspan at any audit inspection or meeting."  
 6 You say at paragraph 15:  
 7 "Certificate 08/4582 and the First issue of  
 8 Certificate 14/5134 stated that the product was a  
 9 Class 0/'Low Risk' material. In order to demonstrate  
 10 this, test reports are required to BS 476—6 and BS 476—7  
 11 and no such reports are contained on any of the K15 file  
 12 folders."  
 13 Then you say at paragraph 16:  
 14 "16. Instead, the classification for K15 was  
 15 extrapolated from a series of fire reports on similar  
 16 Kingspan phenolic products, including those of similar  
 17 density and facing type.  
 18 "17. Copies of the fire reports are exhibited at  
 19 BM4."  
 20 First, is this extrapolation exercise something that  
 21 you had discussed with Mr Albon at any stage?  
 22 A. Yes.  
 23 Q. When, please?  
 24 A. At or about the time, and probably as a result of, the  
 25 request by letter from the Inquiry in approximately

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1 April 2019.  
 2 Q. What was the nature of those discussions?  
 3 A. Well, as I say, locate material, collate material,  
 4 assess the material, and report the material, and —  
 5 Q. What was the nature — I'm so sorry.  
 6 A. Sorry, so that's the exercise.  
 7 Well, if there are no Kingspan — if there are no  
 8 fire reports to justify the class 0 statement, on what  
 9 basis was the BBA including this in a certificate, was  
 10 the question that I asked, and Mr Albon's view, a very  
 11 experienced and senior person at the BBA, his view was  
 12 that it was more likely than not that it was  
 13 extrapolated from a series of fire reports on similar  
 14 Kingspan phenolic products, including those of similar  
 15 density, ie the material referenced at exhibit BM4.  
 16 You will recall that at the start of my statement  
 17 I did clarify that wording as deduction, belief, rather  
 18 than an absolute. There is a formula here that someone  
 19 has extrapolated from a series of fire reports.  
 20 Q. Now, Mr Moore, in your statement you don't tell us that  
 21 the classification for K15 was, as you were told by  
 22 Mr Albon, the product of an extrapolation; you assert  
 23 that it was extrapolated. Why don't you tell us there  
 24 that it was something that Mr Albon told you?  
 25 A. No, it's something that I discussed with Mr Albon, and

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1 I came to this view. Now, whether I was told in terms  
 2 that it happened or that was my conclusion, but with so  
 3 many of the requests from the Inquiry, it was necessary  
 4 for me to, as I say, collate and then assess: why is  
 5 this as it is? So it was one of numerous conversations  
 6 I had when collating, locating and providing material to  
 7 the Inquiry from disparate sources within the BBA. So  
 8 it was not unusual to try to contextualise information  
 9 that was being given to the Inquiry.  
 10 Q. So I need to understand your evidence, because in your  
 11 statement you are making an unqualified statement of  
 12 fact that the classification for K15 was extrapolated;  
 13 now I think you're telling us that in fact you were told  
 14 by Mr Albon that it was more likely than not that the  
 15 classification was a result of an extrapolation. Which  
 16 is it?  
 17 A. Well, let's just — with respect, let's be clear about  
 18 the facts here. The request I received on or about  
 19 17 November was to transpose my letter of on or about  
 20 19 April into a witness statement, which at very short  
 21 notice I did, probably overnight. If you look further  
 22 up that witness statement, I provide an explanation as  
 23 to belief, as to what — if you can look further up,  
 24 I don't know what paragraph number it is, but it's  
 25 further up that witness statement. Might I refresh my

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1 memory from seeing it, please?

2 Q. Yes, of course. If you go to page 2 {BBA00011097/2} we

3 can see paragraph 5, which might be what you want to

4 refer us to. Is that right?

5 A. Yes. So this is the timeline. I was asked to provide

6 a letter, provide information to the Inquiry, came to

7 the BBA, which we did. The narrative contained in it

8 was a composite response drafted by me on behalf of the

9 BBA following consultation and discussion with a number

10 of individuals within the organisation.

11 Paragraph 6, having left the BBA in January and been

12 asked pretty much overnight to make a statement about

13 something I hadn't thought about in a long time,

14 I wanted to establish whether any of the underlying

15 facts had changed, ie had anything been found, because

16 there's always the potential for human error in these

17 things, for things to be misfiled.

18 I said in paragraph 7:

19 "I believe that my short response ... is ... too

20 brief. I think it would be more appropriate to say that

21 'Instead, the BBA believes that the classification for

22 [Kingspan] K15 was extrapolated from a series of fire

23 reports ... '"

24 Rather than as a statement of fact.

25 Now, whether I was told that as a statement of fact

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1 or whether I concluded it was a statement of fact is

2 what I put in the letter, when I came to make my

3 statement in November 2020, I hope these paragraphs

4 explain how I came to be in the position about what was

5 written in my letter, and I have included in there that

6 it was a composite response drafted following

7 consultation and discussion because, you know, I wasn't

8 doing all the digging around and running around looking

9 for all the material, I was having to respond to what

10 I was being presented with.

11 I hope that helps a little bit just explain the

12 context.

13 Q. Let's see how we go.

14 Are you able to tell us what the process or

15 methodology that was used for the extrapolation was?

16 A. No, I can't tell you personally what it was.

17 I understood that it was not — it wasn't common, but it

18 was not unusual, if there were products of a similar —

19 of a very similar kind to each other, and if the

20 performance was adjudged to be so similar to one that

21 we'd already assessed, it was not unusual for the BBA to

22 extrapolate its opinion from one product to a similar

23 one. That was the core of the conversation.

24 Q. Is what you've just told us something that John Albon

25 told you, or is it something you're telling us from your

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1 own knowledge and experience?

2 A. It is something that I'm saying arose in my conversation

3 with Mr Albon based on his knowledge and experience

4 across many, many years, more than me, at the BBA. To

5 me that sounded — and I think this material was

6 actually in the place where the fire test reports would

7 be, in the particular folder, so it was — it was far

8 from a — it wasn't a leap of faith; it was a reasonable

9 deduction to be drawn, and that was the basis for the

10 belief.

11 Q. Did the BBA follow any particular guidance when carrying

12 out these extrapolations?

13 A. Guidance? Not that I'm aware of. It would be the

14 opinion — the technical opinion of the competent

15 individual, supported by their peers. A lot of the BBA

16 work is a technical opinion, which we need to stand by

17 in evidence, but I'm not aware that there's specific

18 guidance in this case that was applied in terms of

19 making the decision about extrapolation, if indeed that

20 was the case.

21 Q. Do you consider that this extrapolation to which you

22 swear is a process permitted by BS 476-6 and 7?

23 A. I'm not swearing that, because I don't know it as

24 a statement of fact, I'm just trying to help the Inquiry

25 understand what happened or may have happened, which was

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1 the purpose of providing information.

2 Q. Well, with respect, Mr Moore, you don't say what may

3 have happened, you say, in an unqualified way at

4 paragraph 16, that the classification for K15 was

5 extrapolated.

6 I'll ask my question again: do you consider that the

7 extrapolation to which you refer in this paragraph is

8 a process permitted by BS 476-6 and 7?

9 A. I really wish to be — I'm not trying to be

10 argumentative, but just the first part of what you said

11 there, can I refer you to my paragraphs 5 and 6 to

12 explain — and 7 of my statement to explain the

13 position, please?

14 Q. Yes, of course. We can go back to page 2

15 {BBA00011097/2}. What is it in paragraph 5 to which you

16 would wish to draw our attention?

17 A. Well, just the process. I believe — forgive me if I'm

18 wrong — at the start that you were referring to

19 paragraph 16 of the statement. Now, that's paragraph 16

20 of the letter that I sent in April. Here is my evidence

21 clarifying paragraph 16 of the letter. But —

22 Q. Mr Moore, I'm going to cut across you. All I want to

23 know is your knowledge.

24 Do you think that the extrapolation process, which

25 is the subject of your witness statement, is a process

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1 permitted by BS 476—6 and 7 or not, or don't you know?  
 2 A. I don't know, however — no, I don't know. I can't be  
 3 certain whether that is permitted. There's a certain  
 4 logic to it, but whether it's permitted or not, I can't  
 5 say.  
 6 Q. Looking at paragraph 16 again, please, you say that the  
 7 extrapolation was from a series of fire reports on  
 8 similar Kingspan phenolic products, including those of  
 9 similar density and facing type.  
 10 Do you know how similar, to use your word, the  
 11 different products have to be for this extrapolation  
 12 exercise to be permissible, if at all? Do you know?  
 13 A. No, I don't know how — no, I don't know how similar  
 14 they need to be.  
 15 Q. Do you know what factors would decide whether or not the  
 16 different products were similar enough for this kind of  
 17 extrapolation to be appropriate?  
 18 A. No.  
 19 Q. To your knowledge, has this concept or methodology of  
 20 extrapolating from test data from one product to another  
 21 product to arrive at an assertion that that other  
 22 product is class 0 ever been discussed or checked by you  
 23 with a fire engineer?  
 24 A. It has not been checked by me with a fire engineer.  
 25 Q. The reports that you have exhibited, were those supplied

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1 to you by Mr Albon?  
 2 A. Yes.  
 3 Q. Did he tell you that it was those fire reports which  
 4 formed the basis of an extrapolation or, as you put it,  
 5 more likely than not an extrapolation?  
 6 A. Yes. Yes, I believe that material was in the folder.  
 7 Could I just go back to paragraph 5 or 6, please?  
 8 Q. Yes, of course, page 2 {BBA00011097/2}.  
 9 A. Yes, forgive me, at the bottom of paragraph 7:  
 10 "The principal reason for this belief [ie that there  
 11 was extrapolation] is that the fire reports referred to  
 12 in Exhibit BM4 had been copied into the K15 folder and  
 13 it is unlikely that would have happened unless someone  
 14 had relied upon them."  
 15 Q. Yes, I see.  
 16 Did Mr Albon play any part in your using or your  
 17 exhibiting those reports, or was it you who selected  
 18 them from the K15 folder simply because they were there?  
 19 A. Anything and everything to do with K15 that I was aware  
 20 of was submitted to the Inquiry, so — yes, so that was  
 21 what we were being asked to do, as I understood it, so  
 22 that's what I asked my team to do: provide material  
 23 related to K15, and if there was anything in that folder  
 24 that related to K15, I hope it's been sent to  
 25 the Inquiry.

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1 Q. Now, I'm going to summarise the reports that formed the  
 2 exhibit which you say were the basis of the  
 3 extrapolation. I am going to summarise them and give  
 4 the references. I'm not going to read them to you.  
 5 The first one is August 1991, a report from a test  
 6 to BS 476—7 on unfaced CFC free phenolic foam laminate,  
 7 that's at {BBA00011290}.  
 8 A report from February 1993 under BS 476—7 on a K7  
 9 sarking board, glass tissue backed, 9—micron aluminium  
 10 facing, {BBA00011286}.  
 11 The next one is October 1993, reports from tests to  
 12 both parts 6 and 7 of BS 476 on a product called K9,  
 13 glass tissue, not foil facer, and that's {BBA00011288}  
 14 and {BBA00011289}.  
 15 July 1994, an LPC letter, which we've seen  
 16 {BBA00011287}.  
 17 October 2003, a report from a test to BS 476—6 on  
 18 Kooltherm DL 2000 with an aluminium face and a glass  
 19 tissue face, and a report also under part 7 on Kooltherm  
 20 DL 3300 with one aluminium face and one glass tissue  
 21 face. Those are at {BBA00011291} and {BBA00011292}.  
 22 Finally, a report in December 2003 to BS 476—6 and 7  
 23 on Kooltherm DL 3300, again with one aluminium face and  
 24 one glass tissue face {BBA00011293}.  
 25 Do you know from your knowledge what consideration

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1 was given during the extrapolation process as to the age  
 2 of those reports, one of which was 15 years old by 2008?  
 3 A. No, I don't know the process by which the extrapolation,  
 4 if it occurred, did occur.  
 5 Q. Do you know what consideration was given to the fact, as  
 6 we can see, as I've said, that none of those products  
 7 appear to have had the same facer arrangement as K15 in  
 8 use in 2008, namely foil facers on both sides of the  
 9 phenolic core?  
 10 A. Again, if they were in the folder, in the section that  
 11 related to fire, then it was the assumption, the belief,  
 12 that they had been considered. Now, whether that —  
 13 whether they were satisfactory evidence to make the  
 14 opinion that would support BS 476 in the absence of  
 15 a test, I can't comment. If they're not sufficiently  
 16 similar, then that can't be a good thing.  
 17 Q. No, I understand.  
 18 Do you know who it was at the BBA who had been  
 19 responsible for making this technical assessment for the  
 20 first issue of the K15 certificate?  
 21 A. No. Again, I believe we provided a list of staff.  
 22 I think that was one of the requests from the Inquiry in  
 23 the same letter, to provide a list of staff. You will  
 24 correct me if I'm wrong, I believe that was the case.  
 25 So I would assume someone who had been involved in that

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1 process on that list. But I can't be sure.  
 2 Q. No, you're not wrong that there was a list asked for and  
 3 provided, but I think you can't tell us who it was on  
 4 that list who —  
 5 A. No.  
 6 Q. No.  
 7 Now, did you see during the course of your  
 8 researches to prepare this statement any document  
 9 demonstrating the extrapolation exercise?  
 10 A. No, I didn't see a document. I remember I had —  
 11 I assumed there must have been one, there must have been  
 12 something for the extrapolation, which is why I wanted  
 13 to check that, and there wasn't one. I went back to the  
 14 BBA the day or two before I was required to make my  
 15 second — had anything else been found? And the answer  
 16 was no. So I didn't see and I haven't to this date seen  
 17 a document based upon which any extrapolation occurred,  
 18 hence caveating it to belief and deduction rather than  
 19 seeing a document that proved it had happened.  
 20 Q. Yes. You agreed, I think, earlier — correct me if I'm  
 21 wrong, and it's apparent from your statement — that  
 22 there was no fire test data to BS 476—6 and 7 provided  
 23 to the BBA relating to Kooltherm K15 before the issue of  
 24 issue 1 of the certificate in October 2008; do you  
 25 agree?

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1 A. I think my evidence would be that no such evidence was  
 2 found in the files, or any place that the BBA looked.  
 3 It would be my assumption that the BBA wasn't provided  
 4 with it. But as a matter of fact strict fact, I can't  
 5 say. But it wasn't in the places where it should be;  
 6 instead was something else, the documents that you've  
 7 just referred to.  
 8 Q. Whose responsibility would it have been — and if you  
 9 can't give me the name then maybe you can give me the  
 10 role or position — to ensure that that fire test data  
 11 had been received for K15 before this certificate was  
 12 issued?  
 13 A. The responsibility would be the project manager who was  
 14 responsible for assessing the product and coming to  
 15 an assessment and a certification decision, plus those  
 16 managing that person, to quality assure that a suitable  
 17 process had been followed.  
 18 Q. Are you able to tell us why this extrapolation exercise  
 19 was carried out rather than simply following up to  
 20 Kingspan with a specific request for fire test data  
 21 under BS 476—6 and 7?  
 22 A. No, I can't. I would be speculating as to why. It does  
 23 seem to me it would be easier just to ask for the  
 24 fire test.  
 25 Q. Are you aware, as you sit there today, that during the

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1 whole of the life of this BBA certificate, Kingspan had  
 2 in fact obtained test results which showed that K15 was  
 3 not able to achieve class 0 as a composite product?  
 4 A. All I've heard is a media report some time ago which  
 5 I inadvertently tumbled into, but today is the first  
 6 formal and informed indication I've received that that  
 7 is the case.  
 8 Q. Do you agree that, had the BBA actually asked to see any  
 9 of the test data on which the assertion that the product  
 10 had achieved class 0 was based, the BBA would have  
 11 discovered the fact that there was no such data?  
 12 A. Yes. Again, I don't know the facts, but surely if that  
 13 information had been — was in the possession of  
 14 a client and provided to the BBA, it would and should  
 15 have changed the outcome.  
 16 Q. Do you agree that the BBA should have requested test  
 17 data to BS 476—6 and 7 instead of extrapolating the data  
 18 from different products and previous certificates, some  
 19 as old as 15 years old?  
 20 A. Without knowing why this was done, the simple answer —  
 21 the best route is to get the test data, you know, the  
 22 476 test data, get it available.  
 23 Q. It's the only route, surely, isn't it?  
 24 A. In the absence of any other explanation, I agree.  
 25 Q. Yes.

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1 Do you accept that proceeding to state class 0 in  
 2 the absence of any test data was a very basic failure of  
 3 due diligence on the part of the BBA?  
 4 A. If there was no basis upon which to include that  
 5 statement in the certificate, then that can't be  
 6 correct, that can't be right.  
 7 Q. Are you able to account for why it was that the BBA  
 8 allowed technical statements to be printed in  
 9 a certificate which would be relied upon by a wide range  
 10 of construction professionals without doing even the  
 11 most basic checks to make sure that the assertions were  
 12 properly founded in evidential data?  
 13 A. I can't explain that.  
 14 Q. Do you agree also — I think you do, looking at  
 15 paragraph 10 of your statement {BBA00011097/3} — that  
 16 in fact no initial inspection of the manufacture of K15  
 17 was carried out?  
 18 A. Yes.  
 19 Q. I think the reason you give is that the product was very  
 20 similar to others already covered by other BBA  
 21 certification; is that right?  
 22 A. Yes.  
 23 Q. If we go to paragraph 11 — it's probably better to see  
 24 it on the screen — this is on page 3 of your second  
 25 statement {BBA00011097/3}, you say there:

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1 "As such, the level of Quality Control operated by  
 2 the Certificate holder was well established and  
 3 considered to be satisfactory. The details for K15 were  
 4 added into the existing BBA Quality Plan and then  
 5 covered by the ongoing surveillance regime."  
 6 What was the source of your knowledge that no  
 7 initial inspection of the manufacture of K15 had been  
 8 carried out?  
 9 A. Again, one of my three or four lieutenants, more likely  
 10 than not Mr Albon.  
 11 Q. Do you know who made the decision not to carry out such  
 12 an inspection?  
 13 A. No, I don't.  
 14 Q. Do you know what the reasoning was behind the decision  
 15 to carry out no initial assessment, inspection?  
 16 A. Sure, other than the reason — the only reason I was  
 17 advised of was the one contained in paragraph 11, ie  
 18 that the certificate holder and the other products were  
 19 well known, well established and could be included  
 20 within the existing quality plan.  
 21 Q. Are you able to explain how anybody could have known  
 22 that K15 was manufactured in an identical way to similar  
 23 products if there had been no inspection of the  
 24 manufacture of K15 by the BBA?  
 25 A. Again, I can't. The underlying premise is that it's so

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1 similar to others that the BBA was already very familiar  
 2 with.  
 3 Q. Was it common practice to your knowledge in 2008 —  
 4 I know you weren't there at the time, but given your  
 5 researches — was it common practice at that time at the  
 6 BBA when a new product was to be certified, such as K15,  
 7 that no assessment was carried out at all on the basis  
 8 that the level of quality control operated by the  
 9 putative certificate holder was considered to be  
 10 satisfactory?  
 11 A. It's difficult — a good number of years before I joined  
 12 the BBA. It certainly wasn't acceptable at the time  
 13 when I was there, and I — yeah, I — it's difficult to  
 14 explain.  
 15 Q. Right. And what does satisfactory mean there?  
 16 Satisfactory by what measure, can you help?  
 17 A. In terms of the ongoing quality management, you know,  
 18 the non-conformances, the adherence of the certificate  
 19 holder to the quality plan was considered to be  
 20 reasonable, ie satisfactory. They were co-operative,  
 21 they were engaged, they were making the effort to be —  
 22 to adhere to the quality plan. That's the — my  
 23 understanding of what that means.  
 24 Q. What is the source of your statements that you make here  
 25 at paragraphs 10 and 11?

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1 A. Again, in discussion with Mr Albon, "Explain this to me  
 2 because we're going to write to the Inquiry and tell  
 3 them what we believe", and part of that discussion — he  
 4 in turn will have spoken to other colleagues in the BBA  
 5 to have a view, and he had his own historical knowledge.  
 6 So that was the basis upon which I reported this to  
 7 the Inquiry.  
 8 MR MILLETT: Thank you very much.  
 9 We're now going to turn to a completely different  
 10 topic, but it is 2 minutes before 4.30, Mr Chairman. It  
 11 would be probably wise, with your leave, to break for  
 12 the day and start that new topic tomorrow morning.  
 13 SIR MARTIN MOORE-BICK: Yes.  
 14 Can you give me any idea how long you might be with  
 15 Mr Moore tomorrow?  
 16 MR MILLETT: Yes, we have been a little longer than I would  
 17 have hoped this afternoon, I'm afraid, so it will be the  
 18 morning.  
 19 SIR MARTIN MOORE-BICK: Right.  
 20 Well, Mr Moore, we are going to break at this point  
 21 in the afternoon. I'm sorry that we have to ask you to  
 22 come back again for more questions tomorrow, but I think  
 23 and hope that you have been warned that that was likely  
 24 to be necessary.  
 25 THE WITNESS: Yes, Mr Chairman.

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1 SIR MARTIN MOORE-BICK: Yes.  
 2 So we will resume at 10 o'clock tomorrow, and please  
 3 remember not to talk to anyone about your evidence or  
 4 anything to do with it overnight. We will hope, but  
 5 I can't guarantee, to get you out by lunchtime. We will  
 6 see how we go anyway. All right?  
 7 THE WITNESS: Yes. Thank you.  
 8 SIR MARTIN MOORE-BICK: Good. See you at 10 o'clock  
 9 tomorrow. Thank you.  
 10 That's where we break for the day. Thank you.  
 11 (4.30 pm)  
 12 (The hearing adjourned until 10 am  
 13 on Wednesday, 17 March 2021)  
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