

OPUS 2

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Grenfell Tower Inquiry

Day 71

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1 Monday, 16 November 2020
 2 (10.00 am)
 3 SIR MARTIN MOORE-BICK: Good morning, everyone. Welcome to
 4 today's hearing. Today we're going to continue hearing
 5 evidence from Mr Roper, who was formerly employed by
 6 Celotex.
 7 Before we hear from Mr Roper, I would just like to
 8 welcome Mr Akbor, who has joined us today in person. We
 9 are very pleased to see him here and to have him with
 10 us.
 11 So would you ask Mr Roper to come back in, please.
 12 Thank you.
 13 MR JONATHAN ROPER (continued)
 14 SIR MARTIN MOORE-BICK: Good morning, Mr Roper.
 15 THE WITNESS: Good morning.
 16 SIR MARTIN MOORE-BICK: All right, all ready to go?
 17 THE WITNESS: Yes.
 18 SIR MARTIN MOORE-BICK: Thank you.
 19 Yes, Mr Millett.
 20 MR MILLETT: Mr Chairman, thank you very much, and good
 21 morning to the entire panel.
 22 Questions from COUNSEL TO THE INQUIRY (continued)
 23 MR MILLETT: Mr Roper, good morning.
 24 A. Good morning.
 25 Q. I'd now like to turn, please, to some questions about

1

1 Sotech and IFC.
 2 It is right, isn't it, that in June 2013, you made
 3 contact with Sotech, didn't you?
 4 A. Correct, yes.
 5 Q. Can we please have {CEL00000602/3} up on the screen.
 6 You can see here that there's a reference at the foot of
 7 the page to the meeting that took place between you and
 8 Michael Egginton of Sotech earlier that month, isn't
 9 there?
 10 A. Yes.
 11 Q. Do you remember the meeting?
 12 A. I do, yes.
 13 Q. Was it arranged or did you meet them at an event?
 14 A. I met Michael at a RIBA event where I was presenting on
 15 building information modelling.
 16 Q. Right.
 17 If we look at the top of page 4 {CEL00000602/4} and
 18 look at the paragraph at the top of the page in that
 19 email, you say to him:
 20 "I tried putting a call through to you earlier but
 21 you were away from your desk so I thought I'd follow up
 22 with an email regarding possible partnering
 23 opportunities for testing to BR 135. As we spoke about
 24 last Wednesday, we are looking to be compliant in
 25 rainscreen systems for buildings above 18m in height and

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1 to do so will need to carry out two large scale fire
 2 tests in accordance with BS 8414."
 3 Now, is it right that originally you were
 4 considering testing to both parts 1 and 2; yes?
 5 A. Yes, I believe so, yeah.
 6 Q. But in the end, that was subsequently abandoned in
 7 favour of a part 2 test only, I think, wasn't it?
 8 A. Correct.
 9 Q. Now, we know that a meeting did take place with Sotech
 10 on 20 June 2013. Do you remember that meeting?
 11 A. Was that the meeting at their offices?
 12 Q. It is. Can we look at {CEL00001863}, please. This is
 13 a note of that meeting, and if we look at the first
 14 page, we can see that it's called a "BR 135 Meeting" in
 15 Durham, and present listed were you and then three
 16 individuals from Sotech, John Egginton,
 17 Michael Egginton -- who I think is John Egginton's son;
 18 is that right?
 19 A. Yes.
 20 Q. And Graham Todd, who is the Sotech sales manager UK.
 21 You see that.
 22 Can I just ask first: is that a note that you made
 23 of that meeting?
 24 A. I believe it is, yes.
 25 Q. Presumably, as you were the only person present.

3

1 A. Yes.
 2 Q. In the note, you can see that the purpose is:
 3 "... to discuss partnering opportunity for testing
 4 to BR 135. To understand previous experience and
 5 methods for testing to BS 8414 using both Rockwool and
 6 Phenolic insulation behind a Sotech cladding system."
 7 Then about halfway down the first page, do you see
 8 it says, under "Sotech & BS 8414-1/2":
 9 "Successfully passed to both 8414/1 & 8414/2. Both
 10 systems incorporated Rockwool insulation and AIM fire
 11 barriers."
 12 Then it goes on to say:
 13 "15 minutes testing, BRE extinguished the chamber
 14 due to fire being at the 9 metre level using K15.
 15 Sotech reverted to Rockwool and passed. Aluminum(sic)
 16 railing system and cladding panels found to melt and
 17 allow fire to enter cavity. Outer face resistance to
 18 fire and tolerance of fire barriers proven to be
 19 crucial."
 20 Can I just ask you, before we go on with that:
 21 "Outer face resistant to fire and tolerance to fire
 22 barriers proven to be crucial", was the outer face there
 23 a reference to the rainscreen material?
 24 A. It was.
 25 Q. The cladding?

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1 A. It was, yes.
 2 Q. So you were told, were you, that the success of an 8414
 3 test may depend on the cladding material used?
 4 A. Correct.
 5 Q. Specifically in relation to cladding materials, you say
 6 in the last two lines there:
 7 "[Aluminium] railing system and cladding panels
 8 found to melt and allow fire to enter cavity."
 9 Pausing there, you knew that aluminium, therefore --
 10 is this right? -- was a particularly risky cladding
 11 material to use with K15 as the insulation as opposed to
 12 Rockwool?
 13 A. Yeah, Sotech explained that ... I'm just trying to think
 14 back to whether the aluminium refers to the panel or the
 15 railing system itself.
 16 Q. Well, it says "[Aluminium] railing system and cladding
 17 panels".
 18 A. Yes, yeah, so there were conversations that took place
 19 that suggested that the outer face of the cladding was
 20 crucial, but equally the aluminium rails that hold the
 21 cladding panel was equally crucial.
 22 Q. Yes. Is it right, therefore, that you knew that
 23 aluminium as the material of choice for the cladding
 24 panel, just focusing on that, was a particularly risky
 25 choice of material to use with K15 as the insulation as

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1 opposed to Rockwool?
 2 A. Well, that was Sotech's view, yes.
 3 Q. That was Sotech's view, and you recorded that.
 4 A. Yes.
 5 Q. Then if you look under the next section, "K15 BBA
 6 Certification & Literature", you record:
 7 "Astonished as to how K15 is used so widely based on
 8 testing involving a cement particle board as the outer
 9 face to represent a typical cladding panel."
 10 Do you see that?
 11 Just on that, astonishment is what you record.
 12 Whose astonishment was it that you were recording there?
 13 A. Both parties', I believe.
 14 Q. Right.
 15 A. I think it's probably the first time that I had
 16 indicated to Sotech the details of K15's BBA
 17 certificate. So, yeah, astonishment from both parties.
 18 Q. Right. I see.
 19 In your witness statement, if we can go back to
 20 that, please, at page 7 {CEL00010052/7}, at
 21 paragraph 4.1.3, if we just look at that, please, and
 22 this is in relation to this meeting, you describe the
 23 test there as unrepresentative. You say you discussed:
 24 "... how Kingspan appeared to be selling its product
 25 for use in a variety of systems based on

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1 an unrepresentative test conducted some years ago."
 2 Was that actually said in the meeting, do you
 3 recall?
 4 A. Yes, it was.
 5 Q. And why was it unrepresentative?
 6 A. Because I think that we jointly looked into their
 7 certification and, as I go on to explain there, I think
 8 what we assumed or found was that they were cement
 9 particle boards, which is a building board and not
 10 a decorative rainscreen that was used.
 11 Q. So cement particle board not being widely used in the
 12 market made it an unrepresentative test --
 13 A. Correct.
 14 Q. -- in your view; yes?
 15 A. Yes.
 16 Q. And in Sotech's view too?
 17 A. Correct.
 18 Q. Right.
 19 Now, you also note the fire barriers that were used
 20 there, Promaseal, and was that because you understood
 21 that they had also contributed to the pass?
 22 I think we need to go back to the note of the
 23 meeting we were on, one document back, if we can
 24 {CEL00001863}. It's three lines down in the paragraph
 25 that we were looking at. You say you:

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1 "Identified that [Kingspan] used Promaseal fire
 2 barriers fixed to a galvanized steel sheet. Sotech
 3 convinced that the system quoted using a standard
 4 cladding panel would fail as the post flashover that
 5 occurs would penetrate and melt the panel and allow the
 6 flame to enter the cavity."
 7 In essence, is it right really that Sotech were
 8 telling you that Kingspan had only passed as a result of
 9 an unrepresentative test, and that if Kingspan K15 was
 10 used in a representative build-up, in other words
 11 a commonly used rig, using a metal panel, it would fail?
 12 A. That's what their view was, yes.
 13 Q. Yes.
 14 Then I think in the next section below that you go
 15 on to identify potential systems using Celotex, and
 16 there are four options there set out.
 17 Were those options those that you put forward or
 18 those that Sotech put forward, do you remember?
 19 A. No, they were ones that we discussed at the meeting, and
 20 mainly I was leaning on them as the manufacturer to come
 21 up with options.
 22 Q. Right.
 23 Given the risk that Sotech had identified, why did
 24 you think it was acceptable to go on to try to achieve
 25 BR 135 classification in circumstances where systems

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1 using metal panels such as aluminium might well fail?
 2 A. Because that was their experience with a particular
 3 product. I mean, the properties of phenolic and PIR are
 4 different. At that time I don't think anybody at
 5 Celotex had carried out a large-scale fire test, and
 6 there wasn't any clarity as to how that product
 7 performed in relation to how phenolic performs in that
 8 situation, hence it wasn't disregarded altogether at
 9 that stage.
 10 Q. I follow.
 11 Now, going back a paragraph in the note, it goes on
 12 to say, four lines up from the end of the previous
 13 section, "K15 BBA Certification & Literature":
 14 "Cleverly designed and worded i.e. non combustible
 15 substrate wording used in literature could be
 16 interpreted as applicable for part 1 and part 2
 17 (cp board & masonry face). Outer face using CP board
 18 classified as 6mm non combustible cladding in product
 19 literature."
 20 Was that by reference to the Kingspan
 21 BBA certificate?
 22 A. Yes, it was, yes.
 23 Q. Did you think that that was acceptable at the time?
 24 A. I thought it was cleverly worded.
 25 Q. What do you mean by cleverly worded?

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1 A. I thought that at that time there was no clarity as to
 2 who the manufacturer of that cladding was that they'd
 3 tested with or what the material actually was.
 4 Q. When you say clever, do you mean potentially misleading
 5 but strictly accurate?
 6 A. Erm ... yes.
 7 Q. Yes.
 8 Now, can we go to {CEL00001865}, please. This is
 9 an email from you, looking at the second one, to
 10 Paul Evans, and he responds to that. But looking at the
 11 second message down -- it's not particularly clear that
 12 it's an email from you, but it says, 24 June, 13.59
 13 Roper, Jonathan wrote:
 14 "Find attached contact report following meeting at
 15 Sotech last Thursday."
 16 So you are sending the note we've just been looking
 17 at to Paul Evans, are you --
 18 A. Yes.
 19 Q. -- on that date? Good.
 20 Then he responds to you the same day:
 21 "Fantastic note. Let's keep the pace on this. As
 22 discussed I'm far more comfortable having a recognised
 23 cladding panel and making the system work inside in line
 24 with guidance provided by a fire expert then(sic) just
 25 copying the cement particle route."

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1 Do you see that?
 2 So had you discussed testing only using a cement
 3 particle board, just like Kingspan had done?
 4 A. Yes, I think it was considered at the time.
 5 Q. Had you had a discussion with Mr Evans between the
 6 Sotech meeting that we saw and you sending him your note
 7 of the meeting about using cement particle board in
 8 a BS 8414 test?
 9 A. Yeah, I think the initial discussions that took place
 10 with Paul when I was tasked with looking into above
 11 18 metres, the obvious place to look was at the direct
 12 competition and how they'd tested. There was always the
 13 view that they would like to test a more realistic
 14 system if possible, and not create a "me too", so to
 15 speak, but that was an option, to revert back to what
 16 Kingspan had tested.
 17 Q. We will come to that choice/option later on when we look
 18 at some of the later material.
 19 Sticking with this point in the year, June 2013,
 20 where we see that Mr Evans says that he's "far more
 21 comfortable having a recognised cladding panel and
 22 making the system work inside in line with guidance
 23 provided by a fire expert [than] just copying the cement
 24 particle route", did you agree with that view at the
 25 time?

11

1 A. I did, yes, and I think the shared view amongst those
 2 individuals within Celotex that were looking at the
 3 development was that that would create a competitive
 4 advantage.
 5 Q. I think, in the next month, you engaged the services or
 6 tried to engage the services of IFC, didn't you?
 7 A. Yes.
 8 Q. You were seeking advice from them as to whether FR5000,
 9 as it then was, would pass a BS 8414 test, weren't you?
 10 A. Correct.
 11 Q. Yes. Let's dive straight into the email on this. This
 12 is {CEL00000673}, and if we look at the email halfway
 13 down the page, this is from Dr Parina Patel, at 15.59 on
 14 4 September, to you and Peter Jackman, and Peter Jackman
 15 was one of her colleagues.
 16 A. That's right.
 17 Q. I think he is now deceased, isn't he?
 18 A. I believe so.
 19 Q. If you look at the third paragraph in that email, just
 20 before the foot of the page, she says -- and in fact
 21 I think it's actually an email that comes from him:
 22 "Parina and I have now had a chance to review the
 23 BS476: Part 6 and 7 test evidence for your FR5000
 24 material which is far superior to the 4000 product
 25 information that you forwarded earlier. The '5000'

12

1 material is definitely superior to the material that
2 I reviewed a few weeks ago, not only in respect of its
3 performance but also in its variability which is very
4 low. We note that the specimens were tested under the
5 nomenclature; Line 1 and Line 2. Are we to assume that
6 these designations represent the two manufacturing lines
7 that the product can be made on? If so they show
8 excellent comparability."

9 If you go over the page {CEL00000673/2}, he says in
10 the first paragraph he is looking at the class 0
11 indices, and then in the second paragraph says:

12 "This is not directly confirmed by the BS476: Part 7
13 tests where the maximum flame spread was reached early,
14 i.e. in the first 1.5 minutes, but I think it indicates
15 that any heat released after the first 90 seconds did
16 not manifest itself as flaming. This must be a good
17 characteristic in respect of generating a satisfactory
18 BS8414 result.

19 "After performing this analysis, I believe we can
20 understand your confidence in respect of achieving
21 a good result under the '8414' method. We are of the
22 opinion that the rates of flame spread and heat release
23 indicated by the Parts 6 and 7 results indeed form the
24 basis for optimism."

25 I've shown you quite a lot of that, but what was the

13

1 basis, did you think at the time, for thinking that the
2 results of the BS 476-6 and 7 tests could be relied upon
3 or extrapolated to give a view about the potential
4 success of a BS 8414 system test?

5 A. I didn't at the time. It was the only, to my knowledge,
6 fire test that Celotex had carried out, so I went to
7 Paul and asked for the BS 476 details and sent those
8 across. Primarily I believe they were, as Peter and
9 Parina have mentioned here, looking at how the FR5000
10 compared to not only the phenolic foam, but equally the
11 4000 range of products that Celotex produced as well.

12 Q. Did it not occur to you that the fact that the 5000 had
13 done well with the class 0 tests didn't indicate one way
14 or the other whether it would pass a full system test
15 under BS 8414 to BR 135 criteria?

16 A. No, I think, as I said, the only fire tests that were
17 available at the time were the BS 476 tests. They said
18 that they would review that information, hence why
19 I sent that across.

20 Q. In the last paragraph, last sentence of that email, you
21 can see that Mr Jackman says:

22 "As a result, if you go forward and book a test we
23 can assist in generating a specimen design to maximise
24 the field of application in the knowledge that we will
25 be the first to know of any possible changes that could

14

1 affect the design."

2 Is it in fact the case that IFC assisted with the
3 design?

4 A. They carried out this initial research and I believe
5 they attended the first test, and they started looking
6 into fire barriers, from memory, as well. So, yeah,
7 they did have some input into this.

8 Q. If we scroll up to the very top of page 1
9 {CEL00000673/1}, we can see that you forwarded this
10 email string on to Paul Evans --

11 A. Yeah.

12 Q. -- on 10 September, and in the second paragraph you say,
13 in the second sentence:

14 "I'll get the ball rolling again with the BRE for
15 a test date end of Oct/Early Nov and endorse IFC to
16 start designing the specimen alongside Sotech."

17 Did Celotex want IFC to be involved in order to
18 maximise the possibility of a pass?

19 A. Yes.

20 Q. And did IFC in fact ultimately take a role in the design
21 of the test?

22 A. In the first test, yes.

23 Q. In the February 2014, as it then turned out to be?

24 A. Yes.

25 Q. They did. Yes, and we'll come to see how that evolves.

15

1 Now, there is then a later meeting, later in the
2 year, in October 2013 with both Sotech and IFC, I think.
3 Do you remember that?

4 A. No, no, I don't.

5 Q. I'll show you a note of that in a moment.

6 Do you remember whether there was a meeting in
7 July 2013?

8 A. No, I don't.

9 Q. Let's show you {CEL00000632}, see if we can clear this
10 up. This is an email, and this pre-dates the messages
11 we've seen, from you to Parina Patel, top of the page,
12 on 15 July 2013:

13 "Parina,

14 "As per our telephone conversation, this is
15 confirmation of our acceptance for Peter to attend
16 a half day meeting commencing at 9.30am on
17 Monday 22nd July."

18 Do you know whether that meeting took place? Do you
19 remember it?

20 A. I believe it did, yes.

21 Q. Do you remember what happened at that meeting or what
22 was said at that meeting?

23 A. No, I don't.

24 Q. Right.

25 At any rate, we know there was a meeting on

16

1 3 October 2013. Can we go to {CEL00001195}, please.
 2 You refer to this meeting, in fact, at paragraph 5.2 of
 3 your witness statement {CEL00010052/7}. You now say you
 4 don't remember it. You remembered it when you did your
 5 statement, but you don't now; is that the position?
 6 A. Erm ... I can remember these notes here, yes.
 7 Q. Right.
 8 Let's look at the note. Now, this, I think, was
 9 circulated by Jamie Hayes, and he, as you can see, was
 10 one of the attendees.
 11 Do you know who wrote this note?
 12 A. Either myself or Jamie, I would imagine.
 13 Q. Right. We can see who was present, and the title of the
 14 meeting or the note is "Above 18 metres fire test, IFC
 15 and Sotech Meeting, Peterlee 03.10.2013 - Summary", and
 16 we can see that those present were John Egginton of
 17 Sotech, David Cooper of IFC, you and Jamie Hayes from
 18 Celotex.
 19 Do you think you wrote this note?
 20 A. I can't say for sure, but it looks like something that
 21 I would have produced, yeah.
 22 Q. Right.
 23 Under "Fire test", it says:
 24 "Very problematic to pass - Kingspan failed twice
 25 with standard cavity barriers."

1 In the second bullet point down, it says:
 2 "John [Egginton] at Sotech sceptical about pass with
 3 decorative cladding."
 4 Decorative cladding, what was that? What did that
 5 indicate?
 6 A. That was a generic term. John was sceptical about rigid
 7 board, ie Kingspan or Celotex, passing an 8414 test with
 8 any form of decorative cladding.
 9 Q. Yes, what did he mean by decorative cladding?
 10 A. I think that was the generic term in terms of metal,
 11 high-pressure laminate, fibre cement, all decorative
 12 cladding, I believe.
 13 Q. I follow. In contradistinction to cement particle board
 14 or fibre board?
 15 A. Yes.
 16 Q. I see.
 17 Now, you had previously discussed the fact that
 18 Kingspan had used a cement particle board to achieve
 19 a pass at your meeting in June with Sotech, we saw that
 20 earlier. Was that discussed again at this meeting? It
 21 looks like it was but do you remember --
 22 A. I believe so, yeah.
 23 Q. If we look down at the third bullet point:
 24 "Still no idea how Kingspan support the use of
 25 decorative cladding as their fire test uses

1 a non combustibile cladding."
 2 Who said that, do you remember?
 3 A. I think that was a general view between most likely
 4 myself, Jamie and John Egginton.
 5 Q. I see. Do you know how that general view arose? Who
 6 first made the point that they had no idea how Kingspan
 7 could support the use of decorative cladding, given that
 8 their fire test had used non-combustible cladding, in
 9 other words cement particle board?
 10 A. I don't know who initially raised that, no.
 11 Q. Right.
 12 Then in the fifth bullet point down:
 13 "Possible idea to design 'double cavity
 14 fire barrier'"
 15 And then the next bullet point identifies it as:
 16 "... a steel grill with an intumescent strip as well
 17 as a traditional mineral wool cavity barrier."
 18 Do you know who mooted that, who suggested that as
 19 a set-up?
 20 A. I think, from speaking to John at Sotech, the distinct
 21 differences between the tests that he'd carried out
 22 previously were predominantly the insulation,
 23 non-combustible and combustible, but from recollection
 24 I believe that he adjusted the cavity barrier for the
 25 test involving the non-combustible insulation, so that

1 then led on to a discussion around cavity barriers and
 2 what were best suited to an 8414 test.
 3 Q. Right.
 4 Why the quotation marks around "double
 5 cavity barrier"?
 6 A. I don't know, if I'm honest with you.
 7 Q. Is it because a double cavity barrier was similarly
 8 unrepresentative of what the market would use in
 9 a commonly used cladding system?
 10 A. I think it related to the reference in Kingspan's
 11 BBA certificate to the Promaseal fire barrier. It was
 12 not just a product reference, it was a Promaseal
 13 fire barrier and -- I can't remember the exact details,
 14 but it almost suggested that there was a double barrier
 15 used in that system.
 16 Q. Right. There is no reference here to Promaseal as there
 17 had been in your Sotech note we saw earlier from the
 18 June meeting.
 19 You say "Possible idea to design 'double cavity ...
 20 barrier'". It looks from that as if this would be
 21 something that would be thought up from scratch and
 22 designed as an innovation; is that right?
 23 A. No. I don't believe so, no. I think we would have
 24 referred back to Kingspan's BBA certificate. I think,
 25 from memory, I looked into the Promaseal fire barrier

1 that was described and it was no longer available .
 2 Q. Was the potential for designing a double cavity barrier
 3 linked to the discussion of Kingspan having failed with
 4 a standard cavity barrier twice?
 5 A. Yes, more than likely , yes.
 6 Q. Did Sotech, or IFC for that matter, say that Kingspan
 7 had achieved their pass under BS 8414 using a double
 8 barrier, double cavity barrier?
 9 A. I think there was some confusion around the description
 10 that was contained in the BBA certificate , and I think
 11 all of the references suggested that there was -- they'd
 12 either used a fire barrier that was no longer available
 13 or there was some form of doubling up of a fire barrier .
 14 Q. I see.
 15 Looking at the previous bullet point, the fourth one
 16 down:
 17 "Very unlikely to pass on the basis that Celotex
 18 FR5000 is slightly better than Phenolic (according to
 19 IFC testing)."
 20 Is the reference there to IFC testing a reference to
 21 the class 0 tests we saw in the earlier emails?
 22 A. Yes, I believe so.
 23 Q. When it was said "Very unlikely to pass", was that IFC
 24 speaking or was that John Egginton speaking, or was it
 25 from either of you or Mr Hayes?

1 A. I think that was Sotech speaking, yes, John.
 2 Q. That's John Egginton?
 3 A. Yes.
 4 Q. Right.
 5 So do we take from that that he was telling you that
 6 even if , as seemed to be the case, Celotex FR5000 was
 7 slightly better than phenolic, it still was very
 8 unlikely to pass?
 9 A. In his opinion, yes.
 10 Q. In his opinion.
 11 Now, can we move on then in time, {CEL00000714}.
 12 This is an email from you to David Cooper of IFC,
 13 31 October 2013, and you say:
 14 "David,
 15 "Following our conversation yesterday evening, find
 16 attached the two A2 products that I've come across in
 17 the market, Alucobond A2 and Marley. Both are
 18 recognised names within the cladding industry and
 19 I think knowing what we know now, this is the wiser
 20 option to pursue. As discussed, I think we should look
 21 to test one of the three following options:
 22 "1. ACM panel with an improved fire barrier system
 23 (not-overly confident that this is the right route to go
 24 down)
 25 "2. A2 panel with a standard fire barrier from list

1 below ..."
 2 And you can see that Promaseal is in fact the fourth
 3 item on the list :
 4 "... (common build-up which we could stand behind if
 5 challenged)
 6 "3. Cement particle board as outer face as per
 7 [Kingspan] (last resort)."
 8 Then in the last two sentences, three lines up from
 9 the end of the message, you say:
 10 "My personal preference which I will voice is that
 11 if we have enough confidence in the A2 panel with
 12 standard barrier system, then we pursue this primarily .
 13 If this fails , a decision will need to be made whether
 14 we want to go down the [Kingspan] route or pull out
 15 altogether ."
 16 Now, just to be clear , you are saying, "Go with
 17 option 2; if that fails , we'll have to decide whether we
 18 go with option 3, which is cement particle board as
 19 outer face, last resort, or pull out altogether ", so
 20 those are the three options; is that right?
 21 A. Yes, that's right .
 22 Q. When you say "knowing what we know now", as you do in
 23 the third line of the email, what did you mean there?
 24 What had you learnt?
 25 A. Sorry, where?

1 Q. Third line of the email in the top paragraph, first
 2 paragraph.
 3 (Pause)
 4 Do you see you say in the second sentence in the
 5 first paragraph:
 6 "Both are recognised names within the cladding
 7 industry and I think knowing what we know now, this is
 8 the wiser option to pursue."
 9 A. I think that's probably a reference to the meeting at
 10 Sotech and what was explored there.
 11 Q. I see.
 12 In the first option, "ACM panel with an improved
 13 fire barrier system", was that a reference to the double
 14 cavity barrier system that you'd discussed at that
 15 3 October meeting?
 16 A. Yes, I believe so, yeah.
 17 Q. It looks as if you weren't particularly confident about
 18 that route, hence your saying so.
 19 A. Yeah, from what John had said, yes.
 20 Q. If you look at the second option, you identify that, as
 21 we've seen:
 22 "... (common build-up which we could stand behind if
 23 challenged)."
 24 When you say "stand behind if challenged", what
 25 would the challenge be based on that you were

1 anticipating there?
 2 A. Well, I think to put this email into context, the brief
 3 that I received was that they wanted to explore --
 4 Celotex wanted to explore 8414 testing, and ideally,
 5 given what they assumed or thought they knew about
 6 Kingspan testing, they wanted a more representative
 7 system.
 8 Q. Right. Does that explain why you referred to the
 9 Kingspan approach in the third option there, "Cement
 10 particle board as outer face as per [Kingspan]", as
 11 a last resort?
 12 A. Yes.
 13 Q. Because it wasn't representative of what was in the
 14 market?
 15 A. That's what the perception was, yes.
 16 Q. I see.
 17 Why would you go down the Kingspan route at all if
 18 it was the last resort?
 19 A. Because I guess there was still, from my perspective,
 20 a general view within the business that they wanted to
 21 launch into this market regardless, and if that was the
 22 only way of passing the test, and given that I'd done
 23 some preliminary research relating to the properties,
 24 fire properties, of phenolic foam and PIR, if that was
 25 the only option, that's what they'd look to achieve.

25

1 Q. Right.
 2 We'll come to see how these options then evolved
 3 further in a moment. Can I just take you back a week or
 4 two in time, earlier into October 2013, and go to
 5 {CEL00003008}, please. Now, this is an email, if you
 6 look a third of the way down the page, from you to
 7 Debbie Berger on 18 October, copied to Jamie Hayes, and
 8 you say:
 9 "Hi Debbie,
 10 "If you are happy to carry out the mystery caller
 11 scenario on [Kingspan], could the three of us get
 12 together early afternoon today?
 13 "See the brief below and a number of objectives that
 14 we would like to come out of the call with answers to.
 15 "If you are both off the phones this afternoon, can
 16 I send an invite for say 2 pm?"
 17 I'll just show you what the brief actually says. If
 18 you go to page 2 {CEL00003008/2} of this email run, just
 19 to refresh your recollection, this is the list of things
 20 to go through which you had also sent to Jamie Hayes
 21 earlier that day and you were now sending to
 22 Debbie Berger. The purpose was:
 23 "... To gain further information on what
 24 recommendations Kingspan are giving in regards to the
 25 use of K15 in buildings above 18m.

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1 "Project - First project of this scale.
 2 "Student Accom/Commercial.
 3 "Metsec frame, cement particle board, Nvelope (NV1)
 4 bracket systems with Trespa Meteon 2mm panels rivet
 5 fixed."
 6 Is Trespa Meteon a decorative cladding?
 7 A. It's a decorative cladding, yes. I believe it's
 8 a high-pressure laminate.
 9 Q. Yes, it's a HPL?
 10 A. Yes.
 11 Q. I see.
 12 You set out what the objectives are there:
 13 "Is K15 applicable with all cladding systems ..."
 14 So that was the background to this, and there are
 15 other questions there as well which are important.
 16 My question here though is: did this mystery shopper
 17 exercise actually go ahead?
 18 A. I believe it did, yes.
 19 Q. Do you know who called Kingspan?
 20 A. I think it was Debbie.
 21 Q. Did she report back to you what answers she'd got?
 22 A. Yes, I believe she did, although I think the venture was
 23 quite unsuccessful, to be honest with you. I think what
 24 was relayed back to me was that they weren't very
 25 forthcoming with any of that information.

27

1 Q. Right.
 2 Now, you then email Paul Evans on 1 November with
 3 a long email which I think summarised your research to
 4 date. Do you remember doing that?
 5 A. I do, yes.
 6 Q. Yes, and we can look at that email, {CEL00000716}, and
 7 we will just take this in stages because it's a long
 8 document. It doesn't go to anybody else in Celotex.
 9 You start by saying:
 10 "Well ... I think we have two possible solutions for
 11 testing in which both David @ IFC and I have confidence
 12 in. Will explain more on Monday but essentially since
 13 the beginning of the project, we have been looking at
 14 testing worst case scenario with an improved fire
 15 barrier to be then supported by assessment report which
 16 broadens the scope of potential systems that we are
 17 applicable for."
 18 Now, just pausing there, we've seen earlier,
 19 I think, that the BRE -- well, let me put it to you this
 20 way: do you remember that earlier, Stephen Howard of the
 21 BRE had told you that a field of application report, or
 22 an FOAR, was not something which applied to BS 8414
 23 tests?
 24 A. That's what we covered on Thursday, correct?
 25 Q. Yes.

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1 A. Yes.
 2 Q. Exactly, we did. You then go on to say:
 3 "After much research, I don't think this is possible
 4 and I don't believe [Kingspan] have a similar report.
 5 We cannot seem to find or design a suitable barrier in
 6 which we have enough confidence that it can be used
 7 behind a standard ACM panel which we know will melt and
 8 allow fire into the cavity. Speaking to SIMCO on
 9 Wednesday in [Birmingham] with IL ..."
 10 That's Ian Lathbury, I think, isn't it?
 11 A. Correct.
 12 Q. Yes:
 13 "... he confirmed that architects will specify K15
 14 with a standard fire barrier and panel. When the work
 15 is contracted and then sub-contracted to cladding
 16 contractors such as Simco, H A Marks, Stanmore etc, they
 17 value engineer that system to be competitive at tender.
 18 This means changing fire barriers, changing panels. The
 19 architect's only guarantee is that K15 will be used
 20 because there is no other alternative available."
 21 Now, when you say in the penultimate line there
 22 changing panels, did you mean changing rainscreen
 23 panels?
 24 A. Correct.
 25 Q. And when you say "we know will melt and allow fire into

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1 the cavity" that I have just read you there in the third
 2 line, how had you come by that knowledge? Was that
 3 through the meetings with Sotech?
 4 A. Correct, yes.
 5 Q. Would you say that that was common knowledge within
 6 Celotex?
 7 A. Yes, I believe it probably was, yeah.
 8 Q. Right. What's the basis for that belief?
 9 A. Because I fed back into the business what I'd researched
 10 and ...
 11 Q. Right. Do you think it was common knowledge within the
 12 industry more generally?
 13 A. That ACM would melt?
 14 Q. Yes.
 15 A. I think probably ACM panels at the time were regarded as
 16 not as fire resistant as others.
 17 Q. Just on ACM, I take it you understood at the time that
 18 it stood for aluminium composite material?
 19 A. I did, yes.
 20 Q. In other words, not just pure aluminium, but something
 21 else in there too?
 22 A. I didn't, at the time, understand the differences
 23 between the cores. I'd heard Sotech talk about A2 and
 24 other such core materials, but I guess I probably didn't
 25 really take into account or fully understand the

30

1 differences between the cores that were being produced
 2 for ACM panels.
 3 Q. Was there any discussion at all between you and Sotech
 4 and you and IFC about the use of polyethylene cores
 5 within ACM panels?
 6 A. Not to my knowledge, no.
 7 Q. Is it fair to say, just looking at what you're telling
 8 Paul Evans here, that RS5000 should not be used with
 9 ACM, even as you understood it?
 10 A. I think, yeah, what I'm saying here is that we haven't
 11 got enough confidence in carrying out a BS 8414 test
 12 with an ACM panel based on what John at Sotech had told
 13 me.
 14 Q. Right. That's a more accurate answer to my less
 15 accurate question.
 16 You go on to say that there was no way of
 17 guaranteeing what cladding or fire barriers would be
 18 used, because whatever was specified would be subject to
 19 value engineering.
 20 Given that observation, were you not concerned that,
 21 even if you knew that RS5000 should not be used with
 22 ACM, it might come to be in any event as a result of
 23 value engineering exercises?
 24 A. I think that's what was happening generally, yes.
 25 Q. Yes. I think, in fact, in the fourth paragraph, as we

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1 see, you go on to say, after the rhetorical question:
 2 "What does all this mean for us? System approval
 3 limits us hugely as the market is so fragmented and it's
 4 extremely difficult to grasp who is being most commonly
 5 used. The likes of Marley, Alucobond & Trespa are
 6 spec'd a lot but value engineered out for standard
 7 aluminium panels. Trying to do the right thing requires
 8 a complete re-education of the [market] and this would
 9 require a huge campaign and probably a lawsuit. Two
 10 options proposed below."
 11 Now, just pausing on the identification of the
 12 brands there, you say they're value engineered out for
 13 standard aluminium panels. Again, standard aluminium
 14 panels, does that mean ACM?
 15 A. I believe so, yes.
 16 Q. Now, in the previous paragraph -- and I'm sorry to jump
 17 around this, but this is probably the logical way
 18 through it -- if you go to the third paragraph, you say
 19 here:
 20 "An architect will be told that K15 is applicable
 21 for above 18m in accordance with ADB and that suffices
 22 from their perspective. Kingspan have done a great job
 23 at the spec end and according to Simco are specified
 24 much more than Rockwool Duo Slab for thermal
 25 performance. As discussed above, contractors opt for

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1 more cost effective solutions and although they are
 2 liable for what goes into that building, they do not
 3 know enough about the fire test to challenge. The only
 4 figure who might possibly challenge a product's
 5 eligibility for use in buildings above 18m is the
 6 building control officer. Kingspan I would suggest do
 7 not have a piece of paper that states they can
 8 specifically be used behind any cladding panel. What
 9 they have done is got BBA certification stating the fire
 10 test method and taken that to LABC to get a registered
 11 document detail which states that K15 can be used in a
 12 variety of cladding systems and complies with ADB
 13 through passing BR 135. A building control officer is
 14 unlikely to challenge a document that is approved from
 15 the head of building control."

16 Now, that paragraph is reasonably clear, but let's
 17 see if I can just put what I understand you're saying
 18 here back to you.

19 Kingspan -- is this right? -- were making very broad
 20 claims about the suitability for use above 18 metres of
 21 their product, K15, underpinned by BBA and LABC
 22 certificates which give the impression that it could be
 23 used in a variety of systems?

24 A. Yes, I think that's right, but I think I'll expand on
 25 that. The initial point about Kingspan doing a good job

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1 or a great job, as I refer to it, at the spec end, what
 2 was clear at this stage was that the primary
 3 consideration for insulation on the external wall of
 4 a building was the thermal performance, and I think very
 5 little consideration was given to the fire performance
 6 of those products.

7 Q. I think you go on to say building control were very
 8 unlikely to challenge those claims. Was that because
 9 there was an LABC certificate?

10 A. Yeah, I think from what I'd seen, Kingspan had got both
 11 a BBA certificate and an LABC certificate, and I guess
 12 I assumed that, because they were being used in such
 13 a variety of cladding systems, building control were
 14 looking at those documents.

15 Q. Did you understand that it was the LABC who were, as you
 16 put it, the head of building control? That's the words
 17 you used at the end of that third paragraph there.

18 A. Did I understand?

19 Q. Yes, you say:

20 "A building control officer is unlikely to challenge
 21 a document that is approved from the head of
 22 building control."

23 Was head of building control LABC?

24 A. No, I don't believe so.

25 Q. What was head of building control then that you meant

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1 there?

2 A. I believe I was probably referring to what is now known
 3 as the Building Control Alliance.

4 Q. I see. The Building Control Alliance don't approve
 5 things, do they? It's the LABC, which is what you
 6 identified as what Kingspan had --

7 A. My understanding is that you have LABC and NHBC and some
 8 numerous other private building control inspectors, and
 9 they all feed into the Building Control Alliance, but
 10 I may have ...

11 Q. I see. But the short point, though, is that once you
 12 got through the LABC gateway, then building control
 13 officers up and down the country would not challenge
 14 what it said and would proceed to permit Kingspan onto
 15 buildings?

16 A. That's what I assumed, yeah.

17 Q. Yes.

18 Is it fair to say that you were explaining here that
 19 there was a lack of understanding in the market about
 20 the regulatory requirements for insulation above
 21 18 metres?

22 A. I think there was a lack of understanding and there was
 23 consideration given to other areas when it came to the
 24 insulation and the cladding panel.

25 Q. Is that a delicate way of saying that, in your view

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1 at the time, as you were expressing it to Paul Evans,
 2 Kingspan were exploiting the lack of understanding in
 3 the market in order to get round the regulatory
 4 requirements?

5 A. I think they were driving demand based on thermal
 6 performance.

7 Q. And had managed to obtain a BBA certificate and an LABC
 8 registered document detail; yes?

9 A. Yes.

10 Q. Did you consider at the time that Kingspan had, to put
 11 it bluntly, done something wrong in order to obtain the
 12 BBA certificate and the LABC document?

13 A. No, I think that the BBA certificate is a certificate
 14 for the product as a whole --

15 Q. Yes.

16 A. -- not just specific to the product in application, and
 17 certainly not specific to the product in application
 18 above 18 metres. I think that they -- what this was
 19 clear evidence was that they had two documents that they
 20 could use, should they be challenged on whether they've
 21 passed a BR -- or BS 8414 test.

22 Q. When you said earlier on that they were driving demand
 23 based on thermal performance, was the flipside of that
 24 that they were doing so without inviting too much close
 25 attention on fire performance?

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1 A. Yes.
 2 Q. Was it your view at the time that you were trying to
 3 communicate to Paul Evans that Kingspan had been perhaps
 4 economical with the truth?
 5 A. Yes.
 6 Q. You then go on to say, and I've shown you this, in the
 7 last sentence of the fourth paragraph, that:
 8 "Trying to do the right thing requires a complete
 9 re-education of the [market] and this would require
 10 a huge campaign and probably a lawsuit."
 11 What did you mean there by "doing the right thing"?
 12 A. Well, I think I explained on Thursday the sort of
 13 divisive issue of system versus product and the debate
 14 that was happening within the business at the time.
 15 There were two schools of thought, that, one, a BS 8414
 16 test was a system, and then I guess a more commercial
 17 view that a competitor was selling in a variety of
 18 cladding systems based on one approval. I guess what
 19 I'm trying to say here is it was my view that it was
 20 a system test, and to try and enforce that would suggest
 21 that what architects and contractors and subcontractors
 22 and building control had been doing for a number of
 23 years since 2006 was incorrect.
 24 Q. Yes. So by doing the right thing, you meant system
 25 means --

1 A. Yeah, I meant advertise it as a system and only
 2 applicable to the components of that system.
 3 Q. Yes, and therefore not exploit the market's ignorance in
 4 a commercially more advantageous way?
 5 A. Correct.
 6 Q. Yes.
 7 When you said it would take a huge campaign and
 8 probably a lawsuit to achieve re-education of the
 9 market, why did you think that?
 10 A. Because the demand was already there for rigid board
 11 insulation in external wall cladding. Kingspan had
 12 created that demand. Specifiers and contractors and
 13 subcontractors were willingly using that product behind
 14 a variety of cladding systems, so to go completely
 15 against the grain and say, "Hang on a minute, you have
 16 been specifying, you have been installing and using the
 17 product incorrectly and here are the reasons why", would
 18 need some fairly significant investment, I would
 19 suggest.
 20 Q. And you refer to a lawsuit there, "probably a lawsuit";
 21 who would bring that lawsuit, did you think?
 22 A. Kingspan.
 23 Q. For what?
 24 A. For essentially saying that what we've said for the last
 25 however many years was technically incorrect.

1 Q. Did you have any experience yourself or knowledge
 2 yourself of Kingspan's character for bringing lawsuits
 3 of that nature?
 4 A. No.
 5 Q. Right.
 6 Does this mean that at this point you had thought
 7 about but discounted the idea of outing, as it were,
 8 Kingspan K15 and what you discovered about how they had
 9 acquired the above-18-metre market for phenolic
 10 insulation?
 11 A. I think it was an option, as with all of my research
 12 that I put on the table, for Celotex to consider.
 13 Q. Right. So outing them was an option, but it wasn't
 14 yours to decide on, is that how you put it?
 15 A. And honestly I don't believe that they wanted to go down
 16 that route because of the investment that would be
 17 required on the huge campaign as I suggest there.
 18 Q. And the risk of being sued by Kingspan?
 19 A. Yeah.
 20 Q. You then set out two options, and let's just look at
 21 those. First:
 22 "Test a standard A2 limited combustible panel of
 23 which there are a few (Alucobond A2, Marley Eternit)
 24 with a standard fire barrier system. If challenged on
 25 what system to use, we can happily state that our test

1 used an A2 panel with a particular commonly used fire
 2 barrier. Still not 100% confident in passing as A2 is a
 3 euroclass classification derived from test data on
 4 reaction to fire testing.
 5 "2. Opt for the [Kingspan] route and put a cement
 6 particle board as the cladding. Use a standard fire
 7 barrier. Good chance of passing knowing they have and
 8 cp board is good in terms of resistance to fire."
 9 Just looking there, those two options, you don't
 10 rank them in seniority as you had done with the email of
 11 31 October we saw earlier. Why is that?
 12 A. Because it wasn't for me to do so. My remit was to
 13 research the market and feed that back in and seek
 14 decisions from my line manager and others within the
 15 senior team.
 16 Q. Right. Nor do you put forward the option which was
 17 option 1 in your previous email of 31 October, which was
 18 testing with an ACM panel, is that because you had
 19 discounted that even before taking the option to
 20 Paul Evans?
 21 A. I think I've discounted that earlier in this email,
 22 hadn't I?
 23 Q. Well, yes. We can see what you say about it. But does
 24 that essentially take us to the reason why there are
 25 only two options in there?

1 A. Yes.
 2 Q. Right.
 3 Then you go on to say:
 4 "However, what we do need to consider is if we have
 5 two potential systems that could pass, how do these
 6 dictate route to market. What does an ASM/CTC state to
 7 somebody who enquires?"
 8 ASM/CTC, that is a reference, I think, to Celotex,
 9 people either in the technical department or the
 10 marketing team, is that --
 11 A. Yeah, so ASM, area sales manager, and CTC, Celotex
 12 technical centre.
 13 Q. Exactly:
 14 "If we simply have the test report, we don't want to
 15 have to provide this as evidence. Do we in fact need to
 16 spend £25k/£30k for BBA to be able to gain this document
 17 from LABC which in my mind gives us very little chance
 18 of being challenged from building control. Do we
 19 partner with a few fire barrier manufacturers who have
 20 tested with K15 currently to gain confidence in the
 21 [market] that way? Or do we take the view that our
 22 product realistically shouldn't be used behind most
 23 cladding panels because in the event of a fire it would
 24 burn?"
 25 You see that?

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1 A. Yes.
 2 Q. In that last sentence there, are you really expressing
 3 your overall basic and honest assessment?
 4 A. Yes, I believe I am.
 5 Q. Yes. And the rest was really just trying to find a way
 6 to get to the market despite your honest and basic
 7 assessment there?
 8 A. Yeah, I don't think this email is the only example of me
 9 putting options on the table for Celotex to consider,
 10 and putting opting out of 18-metre market as a viable
 11 option.
 12 Q. You thought it was a viable option, did you?
 13 A. I think it's one that should have been considered.
 14 Q. In reality, was it in your mind at the time that it was
 15 the only option consistent with honesty and plain
 16 dealing?
 17 A. Yes.
 18 Q. But nonetheless, it wasn't an option that Celotex
 19 pursued, was it?
 20 A. No, and I think the response that I got from this email
 21 and the remarks that I got from other individuals within
 22 the business quickly indicated to me that, regardless of
 23 what the system was that was going to be tested, that
 24 message would be diluted, as it was with Kingspan.
 25 Q. Yes. In other words, if you were going to play in this

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1 market, you had to do so with cute wording?
 2 A. Yes. Yeah.
 3 Q. And therefore the route to market would, as you knew at
 4 the time, involve some kind of deception or disingenuous
 5 presentation?
 6 A. Unless a standard realistic representative system could
 7 have been tested, I think their launch plan and
 8 literature would have made a much bigger deal of
 9 a realistic cladding system, had that been achieved.
 10 Q. And it couldn't be achieved, could it?
 11 A. It was demonstrated in the first test that it couldn't
 12 be achieved.
 13 Q. Paul Evans comes back to you, {CEL00000718}, and he
 14 says:
 15 "Great summary and shows the real merit of good
 16 research and talking to the market. We are trying not
 17 to create a 'me too' here but if we do it will be for
 18 the right reasons."
 19 Does the reference there, "not trying to create
 20 a 'me too' here", mean you were not aiming to replicate
 21 K15?
 22 A. Correct.
 23 Q. What does that mean?
 24 A. That was a phrase that Paul regularly used. I think if
 25 you look historically at Celotex's product development,

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1 it followed Kingspan. Kingspan led the way, Celotex
 2 developed products into a similar market. The view was
 3 that they weren't creating "me toos", but the reality of
 4 it is that they were.
 5 Q. He goes on to say, "if we do it will be for the right
 6 reasons". What would be the right reasons, did you
 7 understand?
 8 A. Commercial, I would suggest.
 9 Q. Oh, I see. So not reasons to do with compliance with
 10 the regulations or life safety or anything like that?
 11 A. No, I believe at this stage, and even before my
 12 involvement with the above-18-metre market, I think the
 13 business more generally had decided that that was the
 14 route that they were going to go down, and they would go
 15 down it regardless of how the product could pass.
 16 Q. Then he asks you in the second paragraph to:
 17 "... put the whole 18m story into some slides and
 18 spend 15mins at the start bringing everyone up to speed
 19 on your work to date. Also have the flip chart there in
 20 case you need to drawing anything up.
 21 "We can then discuss how we go forward. For me, for
 22 every amount of confidence we lose in the other system
 23 passing needs to be offset with the same amount or more
 24 competitive advantage that doing it this way delivers."
 25 Now, just unpacking that a bit, the 15 minutes at

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1 the start, was that a reference to the 4 November
 2 meeting that had by then been scheduled?
 3 A. I believe so, yes.
 4 Q. Right. We'll come to that in a moment. You say in your
 5 statement that you didn't actually attend that meeting,
 6 but you were specifically asked to attend and present
 7 some slides, and I think you went on to create some.
 8 A. Yes.
 9 Q. In that last paragraph that I've just read to you, where
 10 he says "for every amount of confidence", et cetera, did
 11 you understand that Paul Evans meant that any decision
 12 not to follow the Kingspan model which had a higher
 13 chance of passing needed to be justified or offset, if
 14 you like, by the commercial advantage of testing a more
 15 representative system?
 16 A. Yes.
 17 Q. And that Mr Evans himself was doubtful about the case
 18 for testing a more representative system?
 19 A. Yes.
 20 Q. Yes.
 21 Now, moving on in time a little bit, {CEL00003011}.
 22 This is you sending the meeting invitation for
 23 4 November. You, I think, are listed there as one of
 24 the attendees, as you can see.
 25 A. Yes.

1 Q. Along with Craig Chambers, Rob Warren, Paul Evans,
 2 Jamie Hayes, in the boardroom.
 3 Craig Chambers was CEO at the time, wasn't he?
 4 A. Yes, he was, yeah.
 5 Q. And Rob Warren was head of technical?
 6 A. Correct.
 7 Q. Jamie Hayes, why was he invited?
 8 A. Because he was part of the project team.
 9 Q. He is coming to give evidence later this week, but just
 10 tell me, what precisely was his role in this at this
 11 stage?
 12 A. He was assisting from a technical perspective, regarding
 13 regulations, and -- yeah, I mean, most product
 14 development teams consisted of a variety of different
 15 disciplines within the business.
 16 Q. Right.
 17 Can we go to {CEL00011199}, please. That's the
 18 first page, "Above 18m Update". Were these the slides
 19 that you prepared?
 20 A. I believe they were, yeah.
 21 Q. If we just look at the first slide on page 2
 22 {CEL00011199/2}, we can see Approved Document B with, if
 23 we can have it blown up, paragraph 12.5 cut and pasted
 24 there with yellow highlight:
 25 "External walls should either meet the guidance

1 given in paragraphs 12.6 to 12.9 or meet the performance
 2 criteria given in the BRE Report ... (BR 135) for
 3 cladding systems using full scale test data from
 4 BS 8414-1 [or 2] ..."
 5 Now, can we proceed on the basis that, at least from
 6 this time, nobody within Celotex, at least who had seen
 7 these slides, was under any illusion about what the
 8 regulation meant?
 9 A. Correct.
 10 Q. I say "regulation"; about what the guidance meant in
 11 ADB?
 12 A. Yes.
 13 Q. Can we go straight through this to slide 14, please, on
 14 page 14 {CEL00011199/14}, "Celotex Options", and we can
 15 see that you set out there five options:
 16 •" Worst Case Scenario With Field Of Application
 17 Report.
 18 •" System Route (Limits Scope - Requires
 19 Re-Education)
 20 •" Test & Launch Without BBA & LABC.
 21 •" Test & Launch With BBA & LABC.
 22 •" Opt Out Of Above 18m."
 23 Now, these are the alternative routes that you
 24 thought Celotex could follow, and the first is "Worst
 25 Case Scenario With Field Of Application Report". What

1 did you mean there by worst-case scenario?
 2 A. I don't know whether that was reference to the least
 3 fire resistant cladding or the most fire resistant
 4 cladding, looking at that now.
 5 Q. Right. So you can't help me with what you meant then?
 6 A. No.
 7 Q. No.
 8 The second option is -- well, sorry, I should ask
 9 you: were these in order of your preferences?
 10 A. No.
 11 Q. Why were they in the order they were in?
 12 A. Probably because that's how they came into my head when
 13 I was creating the slides.
 14 Q. Right.
 15 The second option down then is:
 16 "System Route (Limits Scope - Requires
 17 Re-Education)."
 18 What did you mean when you said this would require
 19 re-education?
 20 A. The same point that I made earlier from the email.
 21 Q. Were you concerned that testing to the system route
 22 would lead to confusion in the absence of re-education?
 23 A. Erm ... yes, I think it would have been very difficult
 24 to launch the product with a message around the system
 25 without re-educating.

1 Q. What did you have in mind in telling people about the
2 system route by way of their re-education?
3 A. I don't know what I had specifically in mind, but all
4 I knew, it would be a major re-education and, as I've
5 said, a big investment.
6 Q. Would the point of the re-education be, in simple terms,
7 it's a system test, Celotex RS5000 can only be used in
8 exactly the same system because that is what the
9 guidance says?
10 A. Yes.
11 Q. Right.
12 Then it goes on:
13 "Test & Launch Without BBA & LABC."
14 Presumably that was riskier than testing and
15 launching with one?
16 A. Yes, I think there was some hesitancy, as there was with
17 all certification within the business, to disclose any
18 of that information, so without a BBA and LABC
19 certificate, the onus would be on the manufacturer to
20 disclose a test report to the market, which they were
21 hesitant to do.
22 Q. Oh, I see. So when you say with and without, it's not
23 that you don't have one, it's about disclosure?
24 A. I believe so, yeah.
25 Q. Right.

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1 Then if we turn to the next slide, slide 15, page 15
2 {CEL00011199/15}, we can see your assessment, I think,
3 of the prospects of successfully achieving
4 classification to BR 135 with each option. You put in
5 there:
6 "• ACM Panel With Improved Barrier System (<50%)
7 "• A2 Panel With Standard Barrier (80%)
8 "• Cement Particle With Standard Barrier (90%)."
9 So it seems that your view even then was that there
10 was a less than 50% chance that a BS 8414 test pass
11 would be possible with an ACM panel with an improved
12 barrier system?
13 A. Correct.
14 Q. So was that basically discounted from then on?
15 A. Yes, at this meeting, yes.
16 Q. At this meeting, right.
17 In contrast to that, if we look at the third bullet,
18 it says cement particle with standard barrier, that's
19 what Kingspan had done, wasn't it?
20 A. Yes.
21 Q. And that would give you a 90% chance of success.
22 A. Yeah.
23 Q. But the A2 panel with standard barrier only 80%. So
24 what you called your last resort, doing a Kingspan,
25 would still give you a better chance of passing the

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1 BS 8414 than your preferred choice, I think, which was
2 the A2 panel with a standard barrier?
3 A. Yes.
4 Q. Is that correct?
5 A. That's correct.
6 Q. At paragraph 5.14 of your statement, if we just go to
7 that, please, on page 10 {CEL00010052/10}, you say
8 there:
9 "I was aware that Rob and Paul expressed their views
10 at this meeting. These were not entirely aligned."
11 You say "I was aware"; were you not at that meeting?
12 A. I was, yes.
13 Q. So you were aware that they expressed their views at
14 this meeting because you heard them express their views,
15 presumably; is that right?
16 A. Yes.
17 Q. Right.
18 Now, you go on to explain how the line-up worked,
19 and you say:
20 "Prior to this meeting, I was already aware that Rob
21 was clear in his views that BS 8414 was a system test
22 and that the test report relating to a successful test
23 was only applicable to that particular system. I was
24 aware of this as I had an [informal] chat with him.
25 Craig Chambers and Paul were aware that Kingspan was

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1 selling successfully on the basis of one BS 8414 test as
2 to which it provided only limited information to the
3 market and that Kingspan did not seem to be being asked
4 for further details of their test. Craig Chambers and
5 Paul's view was that adopting Rob's interpretation would
6 limit sales and would not be a reflection of market
7 dynamics. I was told by Paul that Craig Chambers had
8 said at the meeting on 4 November, which I did not
9 attend, that there was no point in worrying about a test
10 and its impact on sales until Celotex had passed it
11 successfully."
12 Now, I think it's not right, is it, that you didn't
13 attend that meeting; I think you did, didn't you?
14 A. I believe I did, yes.
15 Q. So that needs to be corrected in your statement.
16 When you say "I was told by Paul that Craig Chambers
17 had said" what you then record there, is it in fact
18 something that you heard Craig Chambers say himself?
19 A. It was, yes, and that was primarily the point of the
20 meeting. I knew that there was contrasting views within
21 the business between Rob and Paul, Craig was obviously
22 the managing director, and that is something that stuck
23 with me, really.
24 Q. Yes.
25 Now, we can see you say in paragraph 5.14 that you

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1 didn't attend that meeting. You also say the same thing
 2 in paragraph 5.13, if we go back a page {CEL00010052/9},
 3 please. You say in the second line there that you
 4 didn't attend that meeting. I think you now accept that
 5 you did. Can you just explain why you have changed your
 6 evidence about that?
 7 A. That's just recollection, I think. I think, yeah --
 8 Q. Having been shown the diary invite?
 9 A. Yes.
 10 Q. Right. Did you present the slides at that meeting?
 11 A. I don't know whether I presented the slides or
 12 whether -- well, I definitely produced the slides. I'm
 13 not sure whether I presented them.
 14 Q. Right.
 15 Can we go back to paragraph 5.14 {CEL00010052/10}.
 16 You say there that Paul Evans and Craig Chambers felt
 17 that Rob Warren's interpretation would limit sales and
 18 not be a reflection of market dynamics.
 19 What did you understand them to mean by not
 20 a reflection of market dynamics?
 21 A. Not a reflection of how the market was operating
 22 currently.
 23 Q. So were Mr Evans and Mr Chambers therefore in favour of
 24 one of the other approaches?
 25 A. They were concerned that a system route would go against

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1 what was already in place in terms of market dynamics.
 2 Q. Right. That's a slightly oblique answer.
 3 Is the position actually straightforwardly simply
 4 this: that Rob Warren basically said, "Look, you need to
 5 do a system test because that's what 8414 says and you
 6 can't market it as anything wider than the system", but
 7 Craig Chambers and Paul Evans said that that was
 8 basically uncommercial and would limit their sales?
 9 A. Yes.
 10 Q. So this wasn't a genuine debate about the meaning of
 11 Approved Document B or the meaning of BR 135 or the
 12 build-up of 8414; this was just about whether or not you
 13 complied on the one hand, or whether or not you bent the
 14 rules to make more money on the other?
 15 A. Yes.
 16 Q. Yes.
 17 Now, the option eventually selected by Celotex was
 18 to test with an A2 board and then obtain LABC approval,
 19 I think, wasn't it?
 20 A. Yes.
 21 Q. Do you accept that that was a similar approach to the
 22 one adopted by Kingspan?
 23 A. It was similar, yes, yeah.
 24 Q. Yes. Because if we look at the final slide of this
 25 presentation, please, on page 16 {CEL00011199/16}, I'm

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1 sorry to go back to it:
 2 "Considerations.
 3 "Proof Of Compliance To BR 135."
 4 And then second bullet point:
 5 "Literature Wording, CTC & ASM Response."
 6 "Literature Wording" there, what did you mean by
 7 that?
 8 A. I think there was a conversation that took place
 9 throughout all of this initial research regarding
 10 (1) can we viably pass a BS 8414 test? And (2) how the
 11 business would then take that forward and market that
 12 product. And there was so much debate regarding those
 13 two, and obviously differing views, that that's what
 14 sort of prompted Craig to say, "We're worrying about how
 15 we take a product forward that we haven't even got
 16 approval for".
 17 Q. Right. Thank you.
 18 Just unpacking that a little bit more, does that
 19 mean that there was discussion at this meeting about how
 20 to word the product literature in order to be able to
 21 give the impression of a much broader suitability for
 22 use of RS5000 than as had been tested?
 23 A. I think there was a general conversation about how much
 24 of the testing information the business disclosed.
 25 Q. And about how the literature was to be worded?

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1 A. Yes.
 2 Q. So presentation?
 3 A. Presentation, tag line, yeah, everything, really.
 4 Adverts.
 5 Q. This was a decision then about how to word the
 6 literature in order to present things in a particular
 7 way and also not reveal other things?
 8 A. Yes.
 9 Q. I'm saying that, but what's your recollection?
 10 A. That's -- yeah, that's ... as I said, there was a lot of
 11 consideration given to the eventual outcomes of a test
 12 and the details of those tests and how that could then
 13 be taken forward.
 14 MR MILLETT: Yes.
 15 Mr Chairman, we've come to a new topic, and it's now
 16 11.15. I won't finish the new topic in five minutes.
 17 It might be a convenient moment.
 18 SIR MARTIN MOORE-BICK: Would that be a better point for
 19 you?
 20 MR MILLETT: It's as convenient a moment as any.
 21 SIR MARTIN MOORE-BICK: We'll have a break now.
 22 Mr Roper, we are taking our break this morning
 23 slightly earlier than usual, because counsel has reached
 24 a convenient point.
 25 THE WITNESS: Okay.

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1 SIR MARTIN MOORE-BICK: So we will stop now and come back at
2 11.30, please.
3 As I told you last week, please don't talk to anyone
4 about your evidence or anything to do with it while
5 you're out of the room.
6 THE WITNESS: Okay, thank you.
7 SIR MARTIN MOORE-BICK: Thank you very much. Would you like
8 to go with the usher, please.
9 (Pause)
10 Good, thank you. 11.30, please.
11 (11.15 am)
12 (A short break)
13 (11.30 am)
14 SIR MARTIN MOORE-BICK: All right, Mr Roper?
15 THE WITNESS: Yes.
16 SIR MARTIN MOORE-BICK: Are you ready to carry on?
17 THE WITNESS: Yes, fine.
18 SIR MARTIN MOORE-BICK: Thank you.
19 Yes, Mr Millett.
20 MR MILLETT: Thank you, Mr Chairman.
21 Mr Roper, can we just go back a little bit in time,
22 but forward in topic, to designing the test.
23 At paragraph 5.7 of your statement on page 8
24 {CELO0010052/8}, you say:
25 "On the morning of 30 October 2013 [five days for so

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1 before the 4 November meeting] I was introduced by
2 Ian Lathbury, an ASM at Celotex, to Graham Smith of
3 Simco. He was keen to work with Celotex and offered to
4 help with the construction of the test rig."
5 Let's look on at {CELO0002090/3}, please. This is
6 an email earlier in the month from Ian Lathbury.
7 I think you need the bottom, probably, of page 2 for
8 this. It's an email of 10 October from Ian Lathbury to
9 Graham Smith at Simco, and relates to a meeting they'd
10 had. If you go over to page 3, you can see that there's
11 some bold text. In the first bold paragraph, you can
12 see that he says:
13 "Note that K15 certificate also states that the
14 product can be used in types of wall cladding
15 incl rainscreen, curtain walling which are outside the
16 scope of this certificate."
17 You see that?
18 Then halfway down the next paragraph, five lines
19 down, he says:
20 "We know from K15's BBA and literature that they
21 have only tested to BS 8414-1 which is onto masonry but
22 by wording their literature cutely, the perception is
23 that they can be used on SFS frame structures above 18m.
24 The sheathing board must be as sound in terms of fire
25 protection as a masonry wall which we know a calcium

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1 silicate board is. However, most would opt for a cement
2 particle board which are cheaper and more commonly used
3 but classified as limited combustibility, not
4 non-combustible.
5 "Our system will be determined by what sheathing
6 board is used in our fire test of which the details are
7 still to be finalised.
8 "Hope this helps.
9 "Jon."
10 Underneath that, you can see Ian Lathbury's name.
11 Just clear this up from for me, if you wouldn't
12 mind, please: who actually sent that email? Was it you
13 or Ian Lathbury, or was it Ian Lathbury cutting and
14 pasting something you had sent him?
15 A. You're referencing the bold text?
16 Q. Let's focus on that, yes.
17 A. Well, I presume I sent it, looking at that.
18 Q. Right, I see.
19 When you say there in that third paragraph "by
20 wording their literature cutely", was that your
21 impression or are you quoting from what someone had said
22 to you?
23 A. I think that was the general view of those that were
24 involved with the above-18-metre project.
25 Q. By the word "cutely", did you mean that Kingspan were

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1 wording their literature to give the impression, false
2 impression, that K15 could be used more widely than they
3 had tested?
4 A. I think that what was clear is they'd only carried out
5 a test to part 1, but from memory even some of the
6 diagrams and images that were used in their datasheet
7 and even in their BBA certificate suggested or
8 demonstrated the product's use onto an SFS frame, as
9 opposed to a masonry substrate, which we know part 1 is.
10 Q. So that's a yes to my question, but on the basis that
11 they'd only passed part 1 but were giving the
12 impression, cutely, that it could be used in a part 2
13 application?
14 A. Yes.
15 Q. Returning back to your direct contact with Simco,
16 I think you then sent an email following your
17 introductory meeting earlier that day, 30 October.
18 {CELO0000711/3}, please. The email starts on page 2,
19 just to show you where it begins, what its context is.
20 It's a follow-up email from you after a meeting with
21 him, and you had some further queries which had sprung
22 to your mind on the way back from the meeting.
23 If you look at the foot of page 1 {CELO0000711/1},
24 we can see his answers. Those are questions, and his
25 answers come the next day. If you go to the foot of

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1 page 1, you can see what he says. He just says:
 2 "Jonathan
 3 "Responses below."
 4 If we go back to the page 2 {CEL00000711/2}, you can
 5 see that there's question 1:
 6 "Do architect's generally specify the material/brand
 7 of cladding to be used on each project or is this again
 8 driven by main/sub contractors?"
 9 His answer -- I am afraid it's in the same colour --
 10 is:
 11 "Nearly always specified but every year more common
 12 that facade panel is revised for VE purposes."
 13 So just thinking back to your 1 November email, is
 14 that where you got the point you made in your 1 November
 15 email about value engineering from?
 16 A. Yes.
 17 Q. And then ditto question number 2:
 18 "We talked about having to obviously submit
 19 paperwork relating to above 18m testing to
 20 building control. If you use K15 on a job, do you have
 21 to submit paperwork or is it the responsibility of
 22 somebody else? And what paperwork is generally
 23 submitted for insulation (bba/test reports etc)?"
 24 Then if you go to page 3 {CEL00000711/3} you can see
 25 his answer:

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1 "Typically yes we have to issue BBA Certificates or
 2 fire testing at Warrington/Chiltern Fire or similar;
 3 even if insulation is specified most large cladding
 4 projects are undertaken by a facade contractor who takes
 5 responsibility for the design. Therefore critical
 6 facade contractor has approval for whatever he
 7 proposes."
 8 Again, was that the basis for your essentially
 9 giving that advice and passing that on to Paul Evans in
 10 your 1 November email?
 11 A. Yes.
 12 Q. Then your third question, you say:
 13 "I'll have a conversation with the BRE tomorrow and
 14 my peers in here on how quickly we can move this project
 15 on. If you are willing to help install the system, do
 16 you have a design team in house if we sent you through
 17 our requirements (i.e fire barriers, cement board,
 18 cladding) and the test structure details?"
 19 Answer:
 20 "We do but they are extremely busy getting ready for
 21 the number of jobs starting on site December. This is
 22 the worst possible time for us internally as busy
 23 designing & planning for these works but have possible
 24 labour available. I cannot promise anything as do not
 25 want to let you down (like Sotech), if you have

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1 details /sketches what is required I can review and ask
 2 if one of my designers can do extra overtime to what
 3 they are doing now."
 4 That was how it was left .
 5 Just after that, then, to what extent were Simco
 6 actually involved in the design of the test, having
 7 offered their services in that way?
 8 A. I believe they produced drawings for test 1, and then
 9 they subsequently provided labour to install the rig on
 10 both occasions.
 11 Q. Just scrolling on, then, to January 2014, {CEL00000795},
 12 this is an email from you to Graham Smith at Simco,
 13 where you thank him for the confidentiality agreement,
 14 and if we look down the email chain -- I'm not sure we
 15 need to -- we can see that Simco had sent back
 16 a confidentiality agreement which Celotex had demanded,
 17 and asked for proof that FR5000 was of limited
 18 combustibility. It seems to have been for another
 19 client .
 20 But looking at the first page, we can see your
 21 response of 22 January, which was to provide the
 22 datasheet confirming class 0 fire performance, as you
 23 can see in the third paragraph.
 24 Why did you give Mr Smith the data about class 0,
 25 given that he was after proof of limited combustibility?

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1 A. Erm ... I don't know, is the honest answer. I think
 2 generally that's what was issued with the datasheet.
 3 Q. Right.
 4 Looking at "Note", you say:
 5 "... Building Control may ask for proof of passing
 6 BR 135 testing which will happen over the next two weeks
 7 but views on what actually constitutes limited
 8 combustibility differs dependent on who you talk to. We
 9 believe we need to demonstrate compliance to approved
 10 document B by passing BR 135, the fire test. Others may
 11 simply want proof that it is Class 0 but we would not
 12 advise Simco installing our product until we have passed
 13 BR 135."
 14 Now, were you telling him that some of your clients ,
 15 Celotex's clients , thought that class 0 as
 16 a classification meant limited combustibility?
 17 A. Yeah, I think that was the perception at the time,
 18 within a certain few, that class 0 meant limited
 19 combustibility .
 20 Q. Was that something you yourself had come across in your
 21 time at Celotex, or something that you had been told by
 22 others within Celotex?
 23 A. Yes, something that I'd been told, and I think I raised
 24 the issue with Rob and he referenced the diagram in
 25 Approved Document B, which I think we saw on Thursday,

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1 which I think relates to the external cladding rather
 2 than the insulation, but I think that's where the
 3 misinterpretation came from.
 4 Q. Right.
 5 Wasn't the point here that the reason Celotex needed
 6 classification to BR 135 was precisely because FR5000,
 7 as it then was, was not a material of limited
 8 combustibility?
 9 A. Yes, correct.
 10 Q. And the fact that it might be class 0 was not relevant?
 11 A. No.
 12 Q. I mean, yes, it wasn't relevant?
 13 A. It wasn't relevant, no. No.
 14 Q. Did you have any concerns at the time about Simco's
 15 apparently limited understanding of the concept of
 16 limited combustibility?
 17 A. No, I didn't.
 18 Q. And that didn't lead you to have any concerns about
 19 accepting any design recommendations from them either;
 20 is that right?
 21 A. That's correct.
 22 Q. Right.
 23 Now, in your statement at paragraph 5.23 -- this is
 24 at page 11 (CELO0010052/11), if we can just have that
 25 up, please -- you refer to an email of 8 November to

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1 Simco, and you say there:
 2 "Simco had previously advised that Celotex needed
 3 panels with good levels of fire resistance and Marley
 4 Eternit panels were very similar to cement particle
 5 boards and had good fire performance."
 6 Now, cement particle board is what Kingspan had
 7 tested, isn't it?
 8 A. Yes.
 9 Q. And you have already explained that, in your view,
 10 Kingspan's testing was unrepresentative of what was used
 11 in the market; that's right, isn't it?
 12 A. Correct.
 13 Q. Yet, despite this, Celotex was opting to test a panel
 14 which they considered to be very similar to the Kingspan
 15 panel.
 16 A. Similar in nature, in material. Marley Eternit is fibre
 17 cement, so it's a cement-based product, but it's not
 18 a building board; it's a decorative cladding panel.
 19 Q. I see. So when you say similar to cement particle
 20 boards, similar in what sense?
 21 A. The formulation of the product.
 22 Q. Right.
 23 A. It's a cement-based board.
 24 Q. Was Marley Eternit similarly unrepresentative in the
 25 same way that Kingspan cement particle board had been?

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1 A. No.
 2 Q. So it was more representative, you thought?
 3 A. Yes.
 4 Q. Right.
 5 Why did you decide to use a Marley Eternit panel as
 6 opposed to an Alucobond panel or any of the others that
 7 you had been considering?
 8 A. Because I think that, as I've said previously, there
 9 wasn't enough confidence in an ACM panel. Following the
 10 discussions with Simco, they suggested that
 11 Marley Eternit were similar in nature to cement particle
 12 board, albeit a decorative façade, and Marley were
 13 a relatively well established brand. I believe the
 14 sales director at Celotex had previously worked with the
 15 sales director of Marley Eternit, and so the link was
 16 there.
 17 Q. Right. Marley Eternit Natura, you say, was a decorative
 18 façade?
 19 A. Yes.
 20 Q. But it was nonetheless a cementitious fibre board,
 21 I think, wasn't it?
 22 A. Yes, correct.
 23 Q. Did the fact that it was a decorative façade not give
 24 you pause for thought, looking back at the Sotech
 25 meeting that you had had in the June and October of

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1 2013, when John Egginton had expressed his views about
 2 decorative panels?
 3 A. Yeah, I think I fed the feedback from Simco's meeting
 4 back into the business, and there was clearly a risk
 5 associated with the Marley Eternit decorative façades
 6 based on what John Egginton had said previously, but
 7 equally there was a drive to try and test a more
 8 representative system.
 9 Q. Was there any aspect of the Natura panel which was
 10 metallic?
 11 A. No.
 12 Q. So the decorative nature of it wasn't the same -- is
 13 this right? -- as the metal panels which you had been
 14 discussing with Sotech?
 15 A. Correct.
 16 Q. Now, we know that the first test was carried out in
 17 February 2014, and I want to look at that with you.
 18 You say that you were in attendance at that test
 19 with Rob Warren; is that right?
 20 A. Yes.
 21 Q. Was Jamie Hayes also there?
 22 A. I didn't state that in my statement, but I've seen
 23 evidence that suggests that he was.
 24 Q. Yes, indeed, he does, but what was your recollection, or
 25 what is your recollection, as to whether Mr Hayes was

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1 there?
 2 A. Looking back at it now, yes, I believe he was there with
 3 some members of IFC.
 4 Q. With representatives from IFC. Do you remember who that
 5 was?
 6 A. I don't off the top of my head.
 7 Q. It's right, isn't it, that the test was extinguished
 8 after 26 minutes?
 9 A. Correct.
 10 Q. And you say in your statement at paragraph 5.27 at
 11 page 12 {CELO0010052/12}, third line:
 12 "There was an obvious failure as the flames reached
 13 the top of the test rig before the specified time."
 14 Was it your view at the time that the failure was
 15 obvious?
 16 A. Yes.
 17 Q. Was Phil Clark of the BRE present throughout the test?
 18 A. He was, yes.
 19 Q. Do you recall talking to him before the test?
 20 A. Yes.
 21 Q. Do you remember what was said?
 22 A. I think we were just trying to ascertain what
 23 constitutes a pass and a fail. There was a big clock in
 24 front of the test rig. If it got to 30 minutes and it
 25 hadn't been extinguished, then there was a good chance

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1 that the rig had passed. Equally, if the flames were
 2 protruding the top of the rig, that was a clear sign
 3 that it was a failure.
 4 Q. Now, in paragraph 5.28 and 5.29 you record discussions
 5 with Phil Clark, and in the second line of
 6 paragraph 5.28 you say:
 7 "Phil told me he shared Rob's view that the
 8 insulation had performed relatively well but that the
 9 cladding panel had cracked and that once fire had
 10 entered the cavity there was not much that could be
 11 done."
 12 Then in paragraph 5.29, you say:
 13 "Following the end of the test, Rob, Ian Cooper,
 14 Phil and I had a discussion whilst at the BRE testing
 15 centre."
 16 Ian Cooper was IFC, wasn't he?
 17 A. Yes, he was, yes.
 18 Q. "Phil said that he had 'seen worse fails' and suggested
 19 that Celotex might want to strengthen the outside of the
 20 test rig in order to counteract the cracking of the
 21 Marley Eternit panels."
 22 I will come back to that in a moment.
 23 Where you record him saying that he, Phil Clark,
 24 shared the view that the insulation had performed
 25 relatively well but, once fire had entered the cavity,

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1 there was not much could be done, was it he who
 2 suggested Celotex might want to consider strengthening
 3 the outside of the rig?
 4 A. Yeah, I think we sort of looked to Phil because that's
 5 what he did on a day-to-day basis, really, he carried
 6 out 8414 tests. So Rob and I could see that, as I've
 7 described there, once the fire managed to get through
 8 the 8-mil panel and into the cavity, that's when it
 9 really started to ... yeah, take shape and end up
 10 flaming at the top of the rig, so we were interested to
 11 get Phil's views. And, you know, bear in mind that at
 12 this stage, this was the first large-scale fire test
 13 that Celotex had ever undertaken, so all of the previous
 14 claims around PIR boards just charring and not
 15 contributing to flame spread, et cetera, et cetera, it
 16 seemed to confirm those initial views.
 17 Q. It looks as if it was you who suggested that
 18 Marley Eternit panels were available in 12 millimetres,
 19 in addition to the 8 millimetres used in the test.
 20 A. Yes.
 21 Q. That had come from you, and you say that:
 22 "... Phil responded that he thought that thickening
 23 the panels to 12mm might suffice."
 24 A. Yes.
 25 Q. So that was his response. You then go on to say:

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1 "Phil also joked that Celotex could use a 6mm cement
 2 particle board like Kingspan - but I knew that this was
 3 not what the business wanted."
 4 Did he actually mention Kingspan by name, do you
 5 recall?
 6 A. Yeah, he did, yeah.
 7 Q. He did?
 8 A. Yeah.
 9 Q. Did he explain to you exactly how Kingspan had used the
 10 6-millimetre cement particle board?
 11 A. Not in detail, no, he just referenced the 6-mil cement
 12 particle board as the outside cladding.
 13 Q. Right. And that was a reference, as you understood it,
 14 to the cement particle board Kingspan had used in its
 15 historic 8414 test?
 16 A. Yes.
 17 Q. Why did you think that Phil Clark was joking?
 18 A. Because ... I think that he understood my concerns
 19 relating to using a decorative façade. I had
 20 conversations when I was at the BRE that referenced that
 21 exact line, "Oh, we could just use a 6-mil cement
 22 particle board like Kingspan, couldn't we", to which he
 23 confirmed that was the case. So I don't know why he
 24 joked after the first test, because it was clear at that
 25 stage that that wasn't the route that we were going to

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1 go down.
 2 Q. When you say he "joked that Celotex could use a 6mm
 3 cement particle board", I'm just trying to understand
 4 why you thought what he was saying was a joke. Was it
 5 because actually you all knew that the use of the
 6 6-millimetre cement particle board that Kingspan had
 7 used was a joke?
 8 A. Unrealistic, yes.
 9 Q. Unrealistic. Well, I don't want to coin a phrase,
 10 perhaps, but a cheat?
 11 A. Erm ... manipulation of the test details, yeah. It's --
 12 I expressed those views to Phil.
 13 Q. You weren't in any doubt, were you, about Phil Clark's
 14 attitude to the reliability of the Kingspan test using
 15 cement particle board?
 16 A. No.
 17 Q. No.
 18 You then go on to say in paragraph 5.31 of your
 19 statement, if we go over the page {CEL00010052/13}:
 20 "Following our internal discussions, I sought some
 21 advice from IFC and the BRE. I spoke to Phil about
 22 thickening the cladding panel to 12mm."
 23 Then you go on to say:
 24 "I believe we also spoke about the option of
 25 strengthening the fire barrier level with a two panel

1 solution because it appeared from the February test that
 2 the cladding panel had cracked and fallen away which
 3 enabled the fire to jump around the fire barrier at
 4 level 2. I do not think that Phil suggested anything
 5 specific in this regard."
 6 Now, when you say that you spoke to him about the
 7 option of strengthening the fire barrier level with
 8 a two-panel solution, what was his response, do you
 9 remember?
 10 A. I don't, no. I recall the conversation and the context
 11 of the conversation, but I don't recall his response.
 12 Q. Right. The two-panel solution came from you, did it?
 13 A. The two-panel solution referred to, again, initial
 14 references of a fire barrier that Kingspan had used
 15 previously that was no longer available.
 16 Q. You say in paragraph 5.31 that this conversation with
 17 Phil Clark followed "our internal discussions". Was
 18 this separate? Was this later than the test day,
 19 14 February 2014?
 20 A. I don't know, I'm not sure.
 21 Q. When did you have the conversation with Phil Clark to
 22 which you are referring here at paragraph 5.31?
 23 A. I'm not sure of the specific date.
 24 Q. Do you know who was party to it, apart from you and
 25 Phil Clark?

1 A. I don't, no. I --
 2 Q. Was Jamie Hayes privy to that conversation?
 3 A. I don't believe he was, no.
 4 Q. What about Paul Evans?
 5 A. Paul never came to the test rig.
 6 Q. Right. Do you think this conversation was at a meeting
 7 or on the phone or ...?
 8 A. I'd be guessing, so I don't ... I don't know.
 9 Q. Right.
 10 Now, I'll come back to this point in a moment, but
 11 can I just go to Jamie Hayes' statement. This is
 12 {CEL00010154/18}, paragraph 54. He says -- and this is
 13 a reference to the test day itself:
 14 "Myself, JR, PE and RW [that's you, Paul Evans and
 15 Rob Warren] did not understand at the time that flames
 16 out of the top of the structure would constitute a Test
 17 failure. I drove back to the office with JR and RW; we
 18 discussed the fact that we felt as though the fact that
 19 the Test had been stopped before the 30-minute mark
 20 suggested the rig had not passed but that if the rig
 21 could pass the thermocouple data it might just pass.
 22 Everyone seemed really excited about this prospect."
 23 Do you remember that conversation?
 24 A. I do, yes.
 25 Q. Is he right in his recollection about what happened in

1 it?
 2 A. Yes, I believe he is.
 3 Q. At paragraph 55, he goes on to say:
 4 "JR telephoned PE from the car as he wanted to find
 5 out how the First Test had gone; he seemed extremely
 6 keen to find out from the BRE as soon as possible what
 7 the outcome of the First Test was. There was a lot of,
 8 emotion from JR and PE related to the First Test result.
 9 I felt that this was linked to the pressure from
 10 Saint Gobain regarding the budget and following further
 11 discussions in the car regarding the further £25,000
 12 that would be required for another test, it was apparent
 13 to me that a second test (the 'Second Test') would be
 14 likely should the first test results show a failure."
 15 Do you agree with him, as he says there, that first
 16 of all you telephoned Paul Evans from the car?
 17 A. That's correct.
 18 Q. And that's because Paul Evans wanted to know as soon as
 19 possible what the result was?
 20 A. Yes.
 21 Q. Do you remember what you told Paul Evans?
 22 A. I told him that -- exactly what I saw, that the test was
 23 terminated after 26 minutes and --
 24 Q. What did Paul Evans say to you?
 25 A. Probably, "Does that constitute a pass or a fail?" You

1 don't get a definitive answer from the BRE there and
 2 then, but having spoken to Phil prior to the test taking
 3 place, I expected that result to come back as a failure .
 4 Q. He goes on to say:
 5 "There was a lot of emotion from JR and PE related
 6 to the First Test result."
 7 Is he right about that?
 8 A. I'm not sure what he's referring to in terms of emotion.
 9 I relayed the information back to Paul as I saw it,
 10 really .
 11 Q. Right.
 12 What about his view that whatever it is you said was
 13 linked to pressure from Saint-Gobain regarding the
 14 budget? Was there a discussion about that?
 15 A. Well, I think there was discussions around budgets and
 16 I wasn't sure -- I mean, these are expensive tests in
 17 their nature, as you can see, £25,000 or there or
 18 thereabouts. I wasn't sure whether Celotex or
 19 Saint-Gobain would commit to an additional test , given
 20 the level of expenditure that had been --
 21 Q. Right.
 22 Just go back to paragraph 5.29 in your statement,
 23 please, at page 12 (CEL00010052/12). You say towards
 24 the foot of the page there:
 25 "I do not recall any mention of any further possible

1 modifications to the rig during this discussion."
 2 That's at the end of the test :
 3 "At the time, I thought this might be the end of the
 4 above 18m project as we had exhausted our budget and it
 5 had only ever been envisaged that we would conduct one
 6 test."
 7 But you also say, if you go back two paragraphs,
 8 same page, at the end of paragraph 5.27:
 9 "I do not recall being particularly surprised by
 10 this failure as it was Celotex's first attempt at the
 11 test."
 12 I would just like to try to see if you can reconcile
 13 those two statements.
 14 Given that you weren't surprised by the failure , are
 15 you saying that you never expected Celotex to pass that
 16 test?
 17 A. I wasn't overly optimistic, no.
 18 Q. Given that you weren't surprised that it had failed the
 19 test, does it mean that, given that you would only
 20 conduct one test, you felt that this test was the one
 21 and only chance?
 22 A. Yes.
 23 Q. Right.
 24 Can we go to {CEL00000842}. This is an email from
 25 you on 17 February 2014, to three days after the failed

1 test on the 14th, to IFC, Parina Patel and David Cooper,
 2 and you say in the second main paragraph:
 3 "I've spoken to Phil this morning and he sees no
 4 reason why a classification report cannot be issued as
 5 it is in his opinion, that extending the test to the
 6 full duration of 30 mins rather than stopping at 25 mins
 7 would have made little difference and as shown attached,
 8 we meet the performance criteria of BR 135 in not
 9 exceeding 600 degrees within the first 15 mins.
 10 "Depending on how Phil's peers at the BRE receive
 11 this, it may be useful if we could set aside a date in
 12 the diary in which you could dial in to discuss your
 13 view from the test."
 14 Given what you have said in your statement, that it
 15 was an obvious fail and you weren't surprised that the
 16 first test had failed, were you surprised by what
 17 Mr Clark said to you, as you record here? Were you
 18 surprised by what he'd said?
 19 A. Yes, I mean, I'm looking at that now and that's the
 20 first time I've seen that email in six years, and --
 21 Q. Right.
 22 A. -- it surprises me as I read it now, yes.
 23 Q. Do I take it from that that you don't remember this
 24 conversation?
 25 A. No.

1 Q. Do you remember a conversation in which you were
 2 surprised that Phil Clark had suggested that you might
 3 pass?
 4 A. Erm ... no, I --
 5 Q. Right.
 6 A. No.
 7 Q. Now, we know that there was a decision made to re-test
 8 following the failure of the test in February. Do you
 9 know when that decision was made?
 10 A. I think there was a discussion internally, myself,
 11 Jamie, Paul, Rob, I don't know whether Craig was
 12 involved in that discussion, but what we'd seen had been
 13 fed back in, really, that the insulation in our view had
 14 performed okay, and that the 8-mil panel had prevented
 15 flames entering the cavity for a certain period of time,
 16 and really that there were two suggestions in that
 17 meeting that then led to a second test being carried
 18 out.
 19 Q. Do you know when that discussion took place?
 20 A. I don't know the specific date, no.
 21 Q. Do you know who was the ultimate decision-maker about
 22 whether or not a second test should take place?
 23 A. That would have been either Paul or Rob. Most likely
 24 Paul because of the budget.
 25 Q. What was the basis on which that decision was taken, do

1 you know?
 2 A. I think because the first test was viewed as a narrow
 3 fail, really.
 4 Q. What gave you confidence -- well, did you have
 5 confidence that Celotex would be able to pass on the
 6 second attempt?
 7 A. It wasn't as bad as I thought it was going to be, the
 8 first test, and Phil's comments made me, I guess,
 9 a little bit more confident that there was a chance of
 10 passing an 8414 test.
 11 Q. Those are the comments we've seen already in your
 12 statement about thickening the Marley Eternit panels to
 13 12 millimetres?
 14 A. Yes, there was two suggestions that came out of that
 15 meeting: Rob suggested that we could take the route of
 16 moving away from the 8-mil Marley Eternit and using the
 17 12-mil Marley Eternit, which we knew was available, and
 18 the second suggestion was from Jamie to incorporate
 19 an additional layer at fire barrier level.
 20 Q. You say Rob suggested you could move away from 8-mil and
 21 use 12-mil; is that right, the actual suggestion came
 22 from Rob Warren, did it, and not you?
 23 A. That's right, yes.
 24 Q. I see.
 25 What research was done into the prospects of passing

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1 before the second test was booked?
 2 A. I don't think there was much more research done other
 3 than taking on board the comments following the first
 4 test.
 5 Q. Right.
 6 Given that you had expected the budget for testing
 7 to be used up, was it not surprising to you that it was
 8 possible to re-test so soon, on the basis merely of
 9 a thickening of the external panels?
 10 A. Erm ... yeah, probably was surprising, actually, yeah,
 11 on reflection.
 12 Q. Do you know how securing the funding for the second test
 13 was gone about?
 14 A. I think Paul or myself spoke to Joe. So, from memory,
 15 the test fees came out of the development budget rather
 16 than the marketing budget.
 17 Q. And Joe is Joe Mahoney, is it?
 18 A. Correct, yes.
 19 Q. What was his role?
 20 A. He was research and development manager at the time.
 21 Q. Did he have the purse strings?
 22 A. He did.
 23 Q. Over the development budget?
 24 A. Over the development budget, yes.
 25 Q. That meant not going back to Saint-Gobain; is that

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1 right?
 2 A. Correct.
 3 Q. I see.
 4 How did you persuade Joe Mahoney that a second test
 5 was worth it?
 6 A. I don't think I did persuade him. I think he was just
 7 asked whether he had an additional £25,000 left in his
 8 budget.
 9 Q. And he did?
 10 A. And he did, yeah.
 11 Q. And he agreed to spend it on the second test?
 12 A. Correct.
 13 Q. Did he not ask for any data or any forecast in order to
 14 justify releasing those funds?
 15 A. No. That wasn't unusual. I mean, a lot of the spend
 16 from the marketing department actually came out of the
 17 development budget generally, so ...
 18 Q. Be that as it may, to your knowledge, did Joe Mahoney
 19 not say to you, "Well, in order for me to release
 20 another £25,000 I'm going to need some sort of concrete
 21 basis on which I can think it is reasonable to do so"?
 22 A. I don't believe he did, no.
 23 Q. Really? Okay.
 24 Now, I want to ask you some questions about the
 25 second test. If you go back to your statement, please,

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1 at page 12 and look at paragraph 5.24. I think
 2 I probably need the bottom of page 11 {CEL00010052/11}
 3 first, just to give you the context.
 4 You say there that it was your preference:
 5 "... for the panels to be 8mm in thickness because
 6 our team thought this was more representative of what
 7 was used in the market, however if only 12mm was
 8 available then that would be fine. Paul, Rob Warren and
 9 Jamie Hayes were aware of this choice of board and the
 10 decision as to thickness."
 11 So is the reason why 8 millimetres was used in the
 12 first test that it was more representative of what was
 13 used in the market?
 14 A. I think they were cautious about using a cladding panel
 15 that came across as too thick, basically, yeah, so
 16 I think 8-mil was deemed to be more representative.
 17 Q. Yes. But in the second test using 12 millimetres, that
 18 might undermine that and make it impractical or less
 19 practical for the test system to be representative of
 20 what was being used in the market?
 21 A. Correct, if that was the route that the business were
 22 going to go down.
 23 Q. Right.
 24 If we go to page 13 {CEL00010052/13} of your
 25 statement and look at paragraph 5.32, we can see here --

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1 I said I would come back to this:
 2 "Paul, Rob, Jamie Hayes and I subsequently discussed
 3 two options: (i) increase the thickness of the panel to
 4 12mm; or (ii) increase the panel thickness and use
 5 a double panel system on the fire barrier, using a
 6 magnesium oxide board. We decided on option (ii)
 7 because we thought that such a system stood the best
 8 chance of passing the test."

9 Who was it who came up with the idea of using
 10 a double-panel system on the fire barrier using
 11 a magnesium oxide board?

12 A. I believe it was Jamie Hayes.

13 Q. Jamie Hayes. Do you remember when he suggested that?

14 A. At that meeting, I believe.

15 Q. We might be able to date it. Can we look at
 16 {CEL00000881}, please. Here is an appointment message
 17 in the Outlook system for a meeting on 31 March 2014,
 18 required: Jamie Hayes.

19 Is that the meeting at which you had discussed the
 20 use of a 6-millimetre magnesium oxide board?

21 A. The only thing that concerns me there is that Rob and
 22 Paul were not invited.

23 Q. No, true. Does that trigger a recollection about when
 24 that meeting might have happened, or was it not that
 25 meeting?

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1 A. I don't believe it was that meeting, no.

2 Q. Right.

3 A. They were present.

4 Q. Apart from Paul Evans, Rob Warren and Jamie Hayes, who
 5 else was aware within Celotex of the suggestion that the
 6 second test should involve the 6-millimetre magnesium
 7 oxide board?

8 A. Just us four, I believe.

9 Q. Right.

10 Did you consider at that time, whenever that was
 11 that it was first discussed, that it would reflect
 12 a typical build-up of a cladding system generally used
 13 in the market?

14 A. No, I think the general view amongst those that knew
 15 that that was the route that they were going to go down
 16 knew it was unreflective.

17 Q. Right.

18 Now, you say that it was just you, Rob Warren and
 19 Jamie Hayes. What about Craig Chambers? Was he also
 20 aware of this discussion about 6 millimetres?

21 A. I don't know, if I'm honest with you.

22 Q. Well, the reason I ask you is if you go to
 23 paragraph 5.32 of your statement {CEL00010052/13}, you
 24 say halfway down:

25 "Craig Chambers may also have been present at that

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1 discussion, although I cannot now clearly recall."

2 Looking back on it now and the material I'm now
 3 bringing to life, I hope, in front of you, do you have
 4 a better recollection of whether Craig Chambers was
 5 privy to the conversation about the use of the
 6 6-millimetre magnesium oxide board?

7 A. I don't, I'm afraid.

8 Q. Right.

9 Were you aware that magnesium oxide was
 10 non-combustible?

11 A. I was, yes.

12 Q. Was there anybody present at the discussion you have
 13 identified at paragraph 5.32 who disagreed with the
 14 approach of using a double-panel system using
 15 a magnesium oxide board?

16 A. No.

17 Q. At the end of that paragraph, you say:

18 "In any event, Paul said he would need to discuss
 19 this in greater detail at the Board meeting. Paul also
 20 said that a discussion with Joe Mahoney would be
 21 required to secure the budget for a further test."

22 Do you know whether, given the answers you have
 23 given me earlier about the discussions with Joe Mahoney,
 24 he was told that a 6-millimetre magnesium oxide board
 25 would be inserted into the test to improve the chances

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1 of passing as a means of securing the budget from him?

2 A. I don't, no. I don't think, from my recollection of my
 3 time at Celotex, that Joe would have put up any
 4 resistance to providing money out of his budget to the
 5 marketing department.

6 Q. Right.

7 Was it your understanding that the board approved
 8 the design of the test as well as the decision to
 9 re-test?

10 A. Sorry, can you rephrase that?

11 Q. Yes.

12 Looking at paragraph 5.32, where you're recording
 13 the fact that Paul Evans told you he would need to
 14 discuss this in greater detail at the board meeting, is
 15 it your recollection that Paul Evans was going to tell
 16 the board about the design of the test, including the
 17 6 millimetres, and not only the fact that they needed to
 18 make a decision to re-test?

19 A. Yes.

20 Q. Was there any discussion at this time about whether the
 21 proposed presence of 6 millimetres of magnesium oxide
 22 would be disclosed in the test reports?

23 A. I think that during the discussion that took place
 24 between myself, Paul, Rob and Jamie, the concern, from
 25 Paul's side primarily, was that it wasn't

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1 representative, and that was one of the key drivers in
2 what he saw that could have been used as a competitive
3 advantage, had the product passed.

4 So there were some reservations from his side, but,
5 as I said before, I quickly understood that any
6 references to the system would be diluted, and I could
7 foresee the business going down the Kingspan route at
8 that stage.

9 Q. Yes.

10 Had there been any concerns as a result of the
11 February test about the cavity barriers that had been
12 used?

13 A. Erm ... I think what became apparent is that the
14 fire barriers that were installed on the first test only
15 worked by being activated by heat or smoke or fire, and
16 expanding upon the inside face of the cladding panel,
17 and I think there was some concern around the ability
18 for that intumescent on the end of the fire barrier to
19 expand and close the cavity. So there were some
20 reservations around there.

21 Q. Did you discuss fire barrier designs alongside the use
22 of 6-millimetre magnesium oxide?

23 A. Yes, I believe we did, yeah.

24 Q. So was the use of magnesium oxide a way of overcoming
25 the problem with the cavity barriers not expanding

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1 fully?

2 A. Yeah, I think what I learned at the time, and what
3 I still believe now, is that the performance of those
4 fire barriers are entirely dependent on the
5 fire resistance of the cladding panel that they expand
6 onto.

7 Q. Do you remember having a meeting with a cavity
8 fire barrier manufacturer?

9 A. Yes.

10 Q. Who was that?

11 A. Siderise.

12 Q. Did you go to the meeting with Siderise?

13 A. Yes.

14 Q. Do you remember what you discussed?

15 A. I think -- I believe Jamie was present there as well.
16 I think we discussed our concerns with Chris of
17 Siderise.

18 Q. Was that Chris Mort?

19 A. Chris Mort, yes.

20 Q. Yes.

21 A. About the ability for their product to firstly expand
22 sufficiently to close the cavity, and then to work if
23 the cladding panel wasn't there in the first place.

24 Q. Did you have any discussion with Chris Mort about the
25 proposed use of 6 millimetres magnesium oxide?

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1 A. I don't know, if I'm honest with you, I don't know.
2 Q. Right.

3 Can we then turn to the test in May 2014,
4 2 May 2014. At page 13 of your statement
5 {CEL00010052/13}, on the same page we're on at the
6 moment, you go on to say:

7 "I do not recall participating in any discussion
8 about changing or reducing the ventilation gaps in the
9 system from the first to the second test. The thickness
10 of the insulation was the same and the same brackets
11 were going to be used. The only changes between the
12 first test and the second test that I was aware of was
13 the thickening of the Marley Eternit panel from 8mm to
14 12mm, and the use of a 6mm magnesium oxide board at the
15 fire barrier at level 2 and at the top of the test rig."

16 Were you also not aware of the fact that at those
17 points, level 2 and the top of the test rig,
18 an 8-millimetre Marley Eternit panel would be used?

19 A. I was aware, yes.

20 Q. So in fact there were three changes, not just two, is
21 this right: thickening of the Marley Eternit panel from
22 8 to 12, use of the 6-millimetre magnesium oxide board
23 where you have said, and also in the same position as
24 the use of 8-millimetre Marley Eternit?

25 A. Correct.

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1 Q. So we can correct that paragraph, can we, in your
2 statement?

3 A. Yes.

4 Q. Is there any reason why you omitted that reference to
5 the 8 millimetres at those points?

6 A. No, no, there isn't.

7 Q. Right.

8 Now, do you know or can you remember when those
9 changes were actually agreed?

10 A. No, I don't recall the specific date, but ... yeah,
11 I would imagine that the meeting that took place
12 previously with Paul and Rob most likely led to that
13 decision.

14 Q. Right.

15 What about Craig Chambers? To the best of your
16 recollection, was he involved in making that ultimate
17 decision to make those changes?

18 A. He would have definitely been involved with the budget
19 side of things.

20 Q. Right.

21 A. I don't know whether Paul disclosed what the changes
22 were between the first and the second test to Craig.

23 Q. Very well.

24 Can we look at {CEL00001109}, please. This is the
25 BRE final test report of 1 August 2014. This is the

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1 test report, as opposed to the classification report,
 2 just to make that clear to you.
 3 We can see on the second page, if we just pick up
 4 page 2 {CEL00001109/2}, that it's signed by Phil Clark,
 5 and authorised by Tony Baker. You see that?
 6 A. Yes.
 7 Q. Now, can we look at page 13 {CEL00001109/13} in that
 8 document. This is figure 3, "The system prior to
 9 testing". We can see that there are some areas of
 10 cladding which are white, the bottom three panels, and
 11 then an area of cladding which is orange.
 12 A. Yes.
 13 Q. Two areas, in fact, which are orange, one at level 2 and
 14 one at the very top of the rig. Are those orange panels
 15 the 8-millimetre Marley Eternit Natura panels?
 16 A. Correct.
 17 Q. The rest are the white 12-millimetre panels, aren't
 18 they?
 19 A. Yes.
 20 Q. Does that mean that with the magnesium oxide behind --
 21 sorry, I should ask you: was the magnesium oxide panel,
 22 the 6-millimetre magnesium oxide panel, sitting just
 23 behind the orange panels we see on that picture?
 24 A. Correct.
 25 Q. So 8 plus 6 is 14 as opposed to 12. Does that mean that

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1 the orange panels protruded very slightly from flush
 2 with the 12-millimetre Marley Eternit panels by
 3 2 millimetres?
 4 A. Yes, yeah.
 5 Q. Can we just see that on the left-hand side there in the
 6 return wall?
 7 A. Yes, you can. I mean, the reflection on the image isn't
 8 very good, but, yes, you can see the magnesium oxide
 9 protruding there.
 10 Q. Yes.
 11 Now, we will come back to this report in due course.
 12 Can I go, please, to {CEL00000892}, please. This is
 13 an email from you to Matt Taylor at FGF Limited. It's
 14 dated 2 April 2014, and it responds to his email to you
 15 of the same day at the bottom of that page. He's
 16 telling you there that he can do 8-millimetre panels and
 17 12-millimetre panels. It follows on from a discussion
 18 I don't think I need to show you. Well, perhaps we
 19 should just look at it, actually. If you look at page 2
 20 {CEL00000892/2}, I think the point is you originally
 21 asked for 6-millimetre panels, didn't you?
 22 A. Yes.
 23 Q. Yes, and we don't need to go to that, but you were told
 24 in a nutshell by Mr Taylor that it wasn't available at
 25 that depth, so you settled for 8.

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1 A. Correct.
 2 Q. That's the message from these emails, isn't it?
 3 A. Yes.
 4 Q. Was the decision to use a thinner layer to make it less
 5 noticeable that there was something else behind it?
 6 A. Yes, it was to try and make it a consistent 12-mil.
 7 Q. Yes, so as to conceal the presence of the 6-millimetre
 8 magnesium oxide board to anybody looking either at the
 9 rig or a photograph of the rig in a later report?
 10 A. It was to prevent any stepping out of the rig.
 11 Q. Yes, and therefore to see off any prospect of anybody
 12 asking questions about why there was a step-out, as you
 13 put it?
 14 A. Correct.
 15 Q. Either looking at the rig itself or any later
 16 photograph.
 17 A. Yes.
 18 Q. Did that not strike you at the time as dishonest?
 19 A. Yes, it did, yeah.
 20 Q. But you went along with it?
 21 A. I went along with a lot of actions at Celotex that,
 22 looking back on reflection, were completely unethical,
 23 and one that I probably didn't potentially consider the
 24 impact of at the time. I was, as we've said, I was 22,
 25 23, first job. I thought this was standard practice,

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1 albeit it did sit very uncomfortably with me.
 2 Q. Yes, thank you.
 3 The reason for using magnesium oxide here at the
 4 fire barriers at level 2 is that one of the criteria for
 5 classification to BR 135 is that the temperature at the
 6 level 2 thermocouples should not or must not exceed
 7 600 centigrade?
 8 A. Yes, that's right, yes.
 9 Q. So by including combustible(sic) material here, Celotex
 10 increased its chances of satisfying that requirement?
 11 A. Correct.
 12 Q. Does the same apply to the use of magnesium oxide at the
 13 top of the rig, that flames overtopping the rig would
 14 lead to failure?
 15 A. Yeah, I think the two biggest criteria were the level 2
 16 thermocouples and the, as seen on the first test, flames
 17 protruding the top of the rig.
 18 SIR MARTIN MOORE-BICK: Mr Millett, you may have
 19 inadvertently given the wrong impression. You asked the
 20 witness whether by including combustible material,
 21 Celotex increased its chances. Is that what you meant?
 22 MR MILLETT: No, and I'm grateful. I meant non-combustible.
 23 SIR MARTIN MOORE-BICK: All right, non-combustible.
 24 MR MILLETT: I will ask the question again.
 25 SIR MARTIN MOORE-BICK: It's a very important point, and

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1 I think the transcript ought to reflect accurately both
 2 the question and the answer.
 3 MR MILLETT: Indeed, I'm grateful, Mr Chairman.
 4 Let me ask the question again. I think you
 5 understood my question, but I'll put it again for the
 6 transcript.
 7 Is it right that you understood that, by including
 8 non-combustible material here, you or Celotex increased
 9 its chances of satisfying the requirement in BR 135 that
 10 the temperature at the level 2 thermocouples does not
 11 exceed 600 centigrade?
 12 A. Correct.
 13 Q. And similarly the reason to include a magnesium oxide
 14 strip at the top would be to avoid flames overtopping
 15 the rig, which would lead to failure, as the first test
 16 had done?
 17 A. Yeah, it was to have something that the fire barrier
 18 could expand to that would stay in situ.
 19 Q. And the reason for using the thicker 12-millimetre
 20 Eternit boards was that that would make it harder for
 21 fire to enter the cavity?
 22 A. Correct.
 23 Q. Yes.
 24 Did you think that those design features were
 25 acceptable? I think, given what you have said just

1 a moment ago, they were not.
 2 A. No, they weren't, and I was fully aware at that stage
 3 that the rig was being overengineered to achieve a pass.
 4 Q. You say, I think, that you sourced the components for
 5 the May test. Can you tell us where you got the
 6 magnesium oxide 6-millimetre boards from?
 7 A. Yes, from the same company that produced the sheathing
 8 board that went on to the steel frame. Versaliner,
 9 I think they're called.
 10 Q. I don't think we're able to find any delivery notes of
 11 it. Do you know when it was delivered to BRE? Was it
 12 at the same time as the sheathing board?
 13 A. Yes, it was, yeah.
 14 Q. Do you know who signed for it at the BRE?
 15 A. I would imagine Phil Clark.
 16 Q. You say you would imagine; why would you imagine that?
 17 A. Because he took delivery of the majority of the
 18 materials that were used on those rigs.
 19 Q. Do you recall having a conversation with Phil Clark
 20 about the use of 6-millimetre magnesium oxide in those
 21 two locations on the rig?
 22 A. Yes.
 23 Q. Do you remember when those conversations were?
 24 A. Initially when we were talking to the BRE about
 25 re-testing --

1 Q. Yes.
 2 A. -- following the meeting with Jamie, Paul and Rob,
 3 I think I put a phone call in to Phil to suggest that we
 4 were looking to re-test. We'd taken on board obviously
 5 what we had learned from the first test and we were
 6 going to look to increase the cladding panel to 12-mil,
 7 and use magnesium oxide at fire barrier level 2.
 8 Q. What about the top of the rig?
 9 A. I don't know whether I mentioned to him about the top of
 10 the rig or not, but ...
 11 Q. Looking back on it, are you in any doubt that, at least
 12 as at the date of the test, Phil Clark was well aware
 13 that the rig included a 6-millimetre magnesium oxide
 14 panel at the level 2 thermocouples and at the top of the
 15 rig?
 16 A. Yes.
 17 Q. You say yes; are you in any doubt?
 18 A. Oh, sorry, no.
 19 Q. You're not in any doubt at all?
 20 A. Not in any doubt, no.
 21 Q. Do you know whether, to the best of your recollection,
 22 anybody else at the BRE was aware that 6-millimetre
 23 magnesium oxide panels were used sitting behind the
 24 Eternit at level 2 thermocouples and at the top of the
 25 rig?

1 A. I don't, no.
 2 Q. Right.
 3 Now, the rig was assembled by Patrick or Patch Jones
 4 of Simco, I think, wasn't it?
 5 A. Yes.
 6 Q. Did you provide him with any updated drawings which
 7 showed the magnesium oxide board?
 8 A. No.
 9 Q. Why is that?
 10 A. Because following the first test, Simco created
 11 an initial set of drawings for test 1. From memory,
 12 I think they were based on the dimensions of one test
 13 rig, there's four at the BRE, and we were subsequently
 14 moved on to a different test rig, so those initial
 15 drawings came out of date very quickly. There was
 16 a couple of comments from Simco that they'd spent a bit
 17 too much time on the design of the rig, and I started to
 18 get the feeling that they didn't want to help us out any
 19 more, really. So that's predominantly the reason why
 20 the drawings weren't updated.
 21 Q. Right.
 22 In paragraph 5.35 of your statement {CEL00010052/13}
 23 you say that Celotex didn't want to pay for updated
 24 drawings. Is that really the reason why Simco didn't
 25 produce any updated drawings?

1 A. Yeah, I think, as I said previously, there was a view
 2 that they were starting to become frustrated with the
 3 level of involvement that the first test required, and
 4 they almost indicated that, yes, they would need to
 5 charge us again for a second set of drawings, which
 6 Celotex didn't really want to pay for.
 7 Q. It wouldn't have been very expensive, though, would it?
 8 A. I don't know what the test fees were or the design fees.
 9 Q. Let's just look at one document, {CEL00000980}, please.
 10 We can see here that this is an invoice from Simco dated
 11 30 June 2014 for, if you look at the left-hand side
 12 under "Description":
 13 *** Fire Test Catch Up - Rig 2**
 14 "Re drawing Rig."
 15 And they charge £420 plus VAT, in total £504.
 16 So it looks from that that whatever drawings they
 17 did do did not cost a great deal of money in the big
 18 scheme of things, did they?
 19 A. No.
 20 Q. Was the real reason that no design drawings were revised
 21 and produced by Simco to conceal the use of magnesium
 22 oxide?
 23 A. Erm ...
 24 Q. 6-millimetre magnesium oxide.
 25 A. I don't think it was, no.

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1 Q. Did anybody from the BRE check the final drawings that
 2 Simco had produced against the rig actually constructed?
 3 A. Erm ... I don't believe they did, no.
 4 Q. Did Simco, regardless of the drawings, know that what
 5 went on to the rig included a 6-millimetre magnesium
 6 oxide panel at level 2 thermocouples and at the top of
 7 the rig?
 8 A. The installers did, yes.
 9 Q. The installers did?
 10 A. Yeah.
 11 Q. Does the same go for the use of the 8-millimetre Marley
 12 Eternit Natura cladding panels at those locations?
 13 A. Yes.
 14 Q. Do you know whether the installers passed that
 15 information back to Simco?
 16 A. I don't, no.
 17 Q. Who were the installers?
 18 A. Patch, as you previously referred.
 19 Q. Yes.
 20 A. And I don't know who the other individual was.
 21 Q. Right.
 22 Given that there weren't any up-to-date drawings
 23 from Simco, did somebody have to tell Patch Jones what
 24 changes to make and what to put up?
 25 A. Yes.

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1 Q. Who was that?
 2 A. That was me.
 3 Q. Right. Anybody else?
 4 A. No.
 5 Q. Was Phil Clark involved in those discussions about how
 6 to construct the rig?
 7 A. No, I believe he wasn't, no.
 8 Q. Right.
 9 At paragraph 5.35 of your statement
 10 {CEL00010052/13}, if we can just look at that paragraph,
 11 you say, fourth line:
 12 "We thought that Patrick could oversee the
 13 construction without the need for revised drawings.
 14 Patrick was instructed by me (I passed instructions on
 15 from Paul and Rob) to build the same system as for the
 16 first test with two changes, thickening the cladding
 17 panel to 12mm and inserting the magnesium oxide board on
 18 the fire barrier at level 2 and at the top of the rig."
 19 Did you also tell him to install the 8-millimetre
 20 cladding panels at those locations?
 21 A. Yes.
 22 Q. Again, were you doing so -- were you passing
 23 instructions from Paul and Rob?
 24 A. Correct.
 25 Q. How did you give him those instructions? Did you stand

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1 at the bottom of the rig and tell him what to do?
 2 A. Yeah. I mean, I don't confess to be an expert in fixing
 3 cladding systems to a rig, but Patch had obviously
 4 installed cladding systems on a number of occasions and
 5 I just instructed that at level 2 it needed to change to
 6 a 6 and an 8 combination, and then equally at the top of
 7 the rig.
 8 Q. Did you explain to him why those components, the
 9 6-millimetre magnesium oxide and the 8-millimetre Marley
 10 Eternit Natura cladding panels, were going on in those
 11 locations?
 12 A. Yes.
 13 Q. Are you in any doubt in your mind about whether he
 14 understood what the purpose of that was?
 15 A. No.
 16 Q. Did he say anything to you?
 17 A. No, I think he understood. He was curious as to how the
 18 first test went, and that was demonstrated that was one
 19 of the reasons why the rig was altered.
 20 Q. Right.
 21 In paragraph 5.37 {CEL00010052/14}, you say:
 22 "Once the test started, it was quickly apparent that
 23 the 12mm cladding panel made a significant difference to
 24 the performance of the system in the test compared with
 25 the one used in the February test. I thought that this

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1 was due to the thickening of the cladding panels;
 2 I thought that the thinner panels cracking had been
 3 a reason for the failure of the first test and the
 4 thicker panels were more robust.”
 5 How could you know or think that it was the thicker
 6 cladding panel that improved the performance rather than
 7 the additional material which had been incorporated?
 8 A. Because the nature of the test is you have a rig at
 9 the -- sorry, you have a crib at the bottom of the rig,
 10 and the flames re-enact breaking out of a window,
 11 I believe, and attacking the face of the cladding panel,
 12 and the cladding panel at that location was the 12-mil
 13 Marley Eternit.
 14 Q. I see. So that was at the bottom?
 15 A. Yes.
 16 Q. Just above the crib?
 17 A. Correct.
 18 Q. Did you have any discussions with anybody from the BRE
 19 during the test?
 20 A. Not to my recollection, no.
 21 Q. Was anybody from the BRE apart from Phil Clark -- well,
 22 was Phil Clark present during the test?
 23 A. Yes.
 24 Q. Was anybody else from the BRE present during the test?
 25 A. I think there were a couple of individuals from the BRE

1 but I don't know who they were.
 2 Q. Right. Stephen Howard?
 3 A. I don't know.
 4 Q. Tony Baker?
 5 A. Again, I don't know.
 6 Q. Right, you don't know.
 7 We then move in time, after the test, to May 2014.
 8 Can we go to {CEL00003116}, please. So later in May.
 9 This is a meeting invitation which you sent to
 10 Paul Evans and he accepted. The subject was an "Above
 11 18m Discussion" in the "CC office" for 12 May 2014. You
 12 see that?
 13 "CC office", does that stand for Craig Chambers'
 14 office?
 15 A. Correct, yes.
 16 Q. Did that meeting take place?
 17 A. I don't know. I presume so, from ...
 18 Q. Do you recall meeting in Craig Chambers' office on
 19 12 May 2014?
 20 A. I don't, no.
 21 Q. Now, the subject of the meeting, according to the
 22 invitation, was "Above 18m". This was just before
 23 a meeting of the management action group, wasn't it,
 24 I think?
 25 A. Yes.

1 Q. That was to take place and indeed did take place on
 2 13 and 14 May 2014; yes?
 3 A. Correct.
 4 Q. Doing the best you can with your recollection on this
 5 document, was the purpose of the meeting to brief
 6 Craig Chambers about the May test in advance of the MAG
 7 meeting?
 8 A. That was more than likely, yes.
 9 Q. Right. But you have no recollection of what you
 10 discussed with Craig Chambers or indeed with Paul Evans
 11 at that meeting?
 12 A. I don't, no.
 13 Q. Do you remember being asked by Paul Evans to prepare
 14 some slides for the forthcoming MAG meeting?
 15 A. I do, yes.
 16 Q. Do you remember when it was?
 17 A. No, I don't.
 18 Q. Did you yourself attend the MAG meeting on 13 and/or
 19 14 May?
 20 A. I don't believe I did, no.
 21 Q. Let's look at the slides you prepared. {CEL00000933}.
 22 These can also be found, because I think they've been
 23 referred to elsewhere, at {CEL00008648}, for the
 24 transcript.
 25 These are entitled "Above 18m", and note if you

1 would -- perhaps you can't, but take it from me -- that
 2 this document runs to 17 pages.
 3 Again, if we look at page 2 {CEL00000933/2}, the
 4 first substantive page, we can see "Background",
 5 Approved Document B, section 12, insulation materials,
 6 section 12.7.
 7 Do you remember putting this slideshow together?
 8 A. Yes.
 9 Q. Starting with that background; yes?
 10 A. Correct.
 11 Q. If we go to page 11 {CEL00000933/11}, this is slide 11,
 12 "Market Research", and we can see some bullet points
 13 here. Let's just look at them:
 14 • "Everybody Uses K15 As There Is No Alternative
 15 • Nobody Understands The Test Requirements
 16 (Architects Ask If It Can Be Used Above 18m, The Answer
 17 is YES)
 18 • " Building Control Have Hugely Differing Levels Of
 19 Understanding On The Subject
 20 • " Give Us A Board That Is An Alternative To
 21 Kingspan & We'll Buy It!"
 22 So those four bullet points there, were they your
 23 personal view as a result of your survey of the market
 24 that you had done previously?
 25 A. No, not just my view, I don't think. I think Paul had

1 some input on this presentation.
 2 Q. Right.
 3 A. And I think a lot of those points had been probably
 4 previously discussed in some of the initial meetings.
 5 Q. Right.
 6 Was the basic point from this slide that you wanted
 7 to get across to the MAG, the board meeting essentially,
 8 was that the market was ignorant, their ignorance had
 9 been exploited by Kingspan, and you wanted to do the
 10 same?
 11 A. Not me personally.
 12 Q. Well, no, but you, Celotex?
 13 A. Yes.
 14 Q. And that's because it was worth £10 million worth of
 15 revenues to Kingspan.
 16 A. I believe so, yes.
 17 Q. And we can see that from the previous slide. Let's just
 18 have that up, page 10 {CEL00000933/10}, last bullet
 19 point. This is about Kingspan K15, and you can see
 20 there, "Worth Circa £10M Per Annum", in the last bullet
 21 point.
 22 Let's look at slide 12 {CEL00000933/12}. This
 23 describes the build-up of the first test, "Testing
 24 Part 1". That's a reference to the February failed
 25 test, isn't it?

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1 A. Correct.
 2 Q. •" Cost - £25K
 3 •" System - 8mm Eternit Cladding
 4 "- Lamatherm Fire Barriers
 5 "- 100mm FR5000
 6 "- Sheathing Board
 7 "- Metsec Frame
 8 "Result - Terminated After 25 Minutes, Flames
 9 Extending Test Facility."
 10 Then if we look at slide 14 {CEL00000933/14}, that
 11 then describes the build-up of the second test, "Testing
 12 Part 2":
 13 •" Cost - £25k
 14 •" System - 12mm Eternit Cladding
 15 "- Lamatherm Fire Barriers With 6mm Magnesium Oxide
 16 "- 100mm FR5000
 17 "- Sheathing Board
 18 "- Metsec Frame."
 19 We can see that there are two differences between
 20 testing part 1 and testing part 2, can't we? The first
 21 is the increase from 8 to 12 millimetres of Eternit
 22 cladding; yes?
 23 A. Yes.
 24 Q. And the second is the reference there in the second
 25 dashed bullet to 6 millimetres of magnesium oxide; yes?

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1 A. Yes.
 2 Q. There is no mention there of the thinner layer of
 3 Marley Eternit cladding, ie the 8 millimetres at the
 4 thermocouples at level 2 or at the top of the rig. Why
 5 is that?
 6 A. Because I guess I probably relied on Paul to expand on
 7 that system, really.
 8 Q. Right.
 9 Now, do you remember emailing these slides to
 10 Paul Evans on 14 May during the meetings?
 11 A. Yes.
 12 Q. Can we look at {CEL00000932}. This is an email you sent
 13 him with the presentation. It says no more than that.
 14 Does that tell us that you didn't discuss these
 15 slides with Paul Evans at the meeting on 12 May that's
 16 referred to in your Outlook diary or at all before you
 17 sent them to him?
 18 A. I'd have definitely discussed those slides with him --
 19 Q. Right.
 20 A. -- prior to me sending them. I mean, it looks like it's
 21 45 minutes before his time slot of 11.30, so it would be
 22 very unlikely for me to send a presentation 45 minutes
 23 before and say, "Present that".
 24 Q. Yes. Well, thank you for that, and that has
 25 anticipated, I think, one or two of my questions later.

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1 So the short point is you had discussed this 17-page
 2 slide deck with him?
 3 A. Correct.
 4 Q. Now, you refer in your statement at paragraph 6.3, if we
 5 can just have that, please, at page 14 {CEL00010052/14}:
 6 "I emailed Paul the slide deck on 14 May 2014. This
 7 email was timed at 1046am which implies that I may have
 8 sent it to Paul whilst the board meeting was ongoing but
 9 I cannot be sure."
 10 Then you go on to say:
 11 "Following the Board meeting, Paul asked me to
 12 create another version of the Board presentation which
 13 did not refer to the February test or to the 6mm
 14 Magnesium Oxide. He said that this was for general
 15 business use. I believed that this shorter version of
 16 the slides would be used for the sales team. I prepared
 17 an edited version as per Paul's instructions."
 18 Just going back, you say you sent these slides to
 19 him during the meeting. As far as you know, were these
 20 slides presented to the meeting?
 21 A. I believe so, yes.
 22 Q. All 17 pages in that set, were they?
 23 A. I don't know. It would be very unlikely to skip slides
 24 of a presentation.
 25 Q. Right.

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1 Can we then take it that it's your evidence, as far
 2 as you recall it, that everybody at that MAG meeting was
 3 aware of the differences between the build-up of the
 4 failed February 2014 test and the build-up of the
 5 successful May 2014 test?
 6 A. Yes.
 7 Q. Do you know who presented those slides to the meeting?
 8 A. I presume Paul. I think he had a flat roofing review
 9 and an above-18-metre review to present.
 10 Q. Now, as we've just seen in your statement at the bottom
 11 of page 14 and over to the top of page 15,
 12 paragraph 6.3, that after that meeting Paul Evans asked
 13 you to produce a shorter version of the slides which
 14 didn't refer to the February test or the magnesium
 15 oxide.
 16 Do you remember whether he asked you to do that in
 17 a conversation or a meeting or whether he did that by
 18 email?
 19 A. No, a conversation.
 20 Q. How soon after the meeting do you remember he asked you
 21 to do that?
 22 A. I believe it was on that same day, because I think I had
 23 a SPIN meeting, which was another internal meeting, that
 24 afternoon. So ...
 25 Q. You say at the top of page 15 {CEL00010052/15}:

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1 "He said that this was for general business use."
 2 Did he use those words?
 3 A. He did, yes, and then he subsequently expanded on those
 4 as well.
 5 Q. Well, what did he say by way of expansion?
 6 A. He suggested that, following that meeting, the decision
 7 had been taken to launch the product. I was to continue
 8 to progress with NHBC, LABC and -- approval, sorry, and
 9 BRE testing, and that the decision had been made to omit
 10 the magnesium oxide from any reference going forward.
 11 Q. Now, you say:
 12 "I believed that this shorter version of the slides
 13 would be used for the sales team."
 14 Did he say that or is it something you inferred?
 15 A. It was something that he indicated that when it came to
 16 launch and the sales team and even the technical centre,
 17 this shorter version of the slides would be used.
 18 Q. In the answer before last, you said that the decision
 19 had been made to omit the magnesium oxide from any
 20 reference going forward. When you say "The decision had
 21 been made", did you understand him to mean that the MAG
 22 had made that decision?
 23 A. Erm ... I don't know whether it was the MAG. I can only
 24 presume, because the decision, as it was relayed to me,
 25 was after that meeting, so ...

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1 Q. Yes. Really what I'm trying to get at is whether your
 2 impression of this was that the decision to use a
 3 shorter slideshow without the 6-millimetre magnesium
 4 oxide was an MAG decision which had been communicated to
 5 him which he was then communicating to you, or whether
 6 it was simply his decision as a result of what he picked
 7 up at the MAG meeting?
 8 A. I think it was the first of those.
 9 Q. Right, thank you.
 10 I think you did produce a shorter version, and we're
 11 going to come to those in a moment. Before I go to
 12 those, can I just look at paragraph 6.4, while we're on
 13 that page. You say there:
 14 "Louise Garlick, the Customer Service Manager, who
 15 I believe had apparently been present for at least some
 16 of the Board meeting, spoke to me at around this time
 17 and told me that there had been a heated exchange
 18 between Rob Warren and Paul as to what to do. The
 19 upshot, as I understood it from Ms Garlick, was that
 20 a decision had been taken (it was not entirely clear to
 21 me when or by whom) that there would be no reference to
 22 the first failed test, nor to the magnesium oxide board
 23 used in the second test."
 24 Then you say:
 25 "With the benefit of hindsight it seemed to me that

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1 Celotex was going down the Kingspan route in not giving
 2 full details of the system that had been tested."
 3 Did anybody else tell you about this heated exchange
 4 other than Ms Garlick?
 5 A. No, I don't believe so.
 6 Q. What did you understand the heated exchange to have
 7 been?
 8 A. At the time, it was most likely the divisive issue that
 9 had been brought up on many occasions in terms of system
 10 versus product, commercial versus technical.
 11 Q. Did you understand who was on which side?
 12 A. Yes.
 13 Q. And Rob Warren was on what side?
 14 A. Technical, system.
 15 Q. And Paul Evans?
 16 A. Commercial.
 17 Q. Those are useful shorthands, but do we take it from that
 18 that Rob Warren had wanted to be clear and transparent
 19 but Paul Evans not?
 20 A. I think it came back to the initial conversation that
 21 had been had in the business on numerous occasions
 22 around: are we going to market and launch this product
 23 as a system or are we going to market and launch this
 24 product into a market that's already established as just
 25 another alternative option?

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1 Q. Established on the back of Kingspan's dominance and what
2 it had told the market?
3 A. Correct.
4 Q. And what those certifying its products were prepared to
5 say?
6 A. Yes.
7 Q. Let's go to the slideshow.
8 Before I do, let me just ask you one more question.
9 Given that Paul Evans had asked you to remove
10 references to the magnesium oxide in the slides, did you
11 understand that he had supported that decision during
12 the heated exchange or at the MAG meeting more
13 generally?
14 A. Yes.
15 Q. Let's look at the slides, {CEL00000961}. Now, you
16 remember that the one you produced for the meeting was
17 17 pages. This now comes down to 12 pages. Is this
18 your revised slide pack --
19 A. I believe it is, yes.
20 Q. -- in response to Mr Evans' instructions; yes?
21 A. Yes.
22 Q. Now, we can thumb through it, but it's right, isn't it,
23 that this doesn't mention the February test at all?
24 A. No.
25 Q. And that was presumably to conceal the fact that Celotex

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1 had failed the February test?
2 A. Correct.
3 Q. If we look at slide 9, page 9 {CEL00000961/9}, we can
4 now see the description of the test build-up, which
5 of course is the second test, as we know:
6 •" Cost - £25k
7 •" System - 12mm Eternit Cladding
8 "- Lamatherm Fire Barriers."
9 And note no reference there to the 6-millimetre
10 magnesium oxide, and then it goes on as per:
11 "- 100mm FR5000
12 "- Sheathing Board
13 "- Metsec Frame
14 •" Result - Passed (Completed 60 Minutes Testing)."
15 Now, I've just shown you this. There is no mention
16 of the magnesium oxide, and indeed there is no mention
17 of the 8-millimetre Eternit cladding either, in the same
18 way as it in fact hadn't been mentioned in the 17-page
19 version.
20 Again, were both of those omissions designed to
21 mislead the reader into thinking that the build-up here
22 we can see on page 9 was the actual build-up tested?
23 A. Correct, yes.
24 Q. You say in paragraph 6.5 of your statement
25 {CEL00010052/15} that:

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1 "With the benefit of hindsight it seemed to me that
2 Celotex was going down the Kingspan route in not giving
3 full details of the system that had been tested."
4 In fact, you knew at the time, surely, that this
5 slide was downright misleading?
6 A. Yes, I did.
7 Q. And intended to mislead?
8 A. Yes.
9 Q. Did you realise at the time that if this was how the
10 test was to be described to the market, it would be
11 a fraud on the market?
12 A. Yes, yeah, I did.
13 Q. Did you not feel at the time a sense that that was
14 wrong?
15 A. I felt incredibly uncomfortable with it. I recall going
16 home that evening, and I still lived with my parents at
17 the time and mentioned that to them, and I felt
18 incredibly uncomfortable with what I was being asked to
19 do. Yeah.
20 Q. Was there nobody in Celotex you could have gone to and
21 shared those concerns with?
22 A. All of the senior management were in that meeting.
23 Q. So is the answer to my question no?
24 A. Yeah. No.
25 Q. Now, following the May fire test, it's right, isn't it,

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1 that the BRE provided you with a series of reports or
2 a number of reports; yes?
3 A. Correct, yes.
4 Q. There are in fact, I think, three different reports. We
5 have a full -- and correct me if I'm wrong about this,
6 there's a full test report dated 1 August 2014 which
7 bears the number 295369, and that ran to some 33 pages.
8 A. That's right, yes.
9 Q. Then there is a classification report, 295255, which ran
10 to 12 pages. There was also, I think, a summary
11 classification report which had four pages, also under
12 report reference 295255. Am I right about that?
13 A. Yes.
14 Q. Right. Let's see if we can chase the chronology
15 through.
16 Mr Roper, are you all right to carry on or shall we
17 have a break?
18 A. No, that's fine.
19 Q. We will finish at 1 o'clock.
20 A. Okay.
21 Q. The first is {CEL00003177}. This is an email of
22 19 June 2014 from Phil Clark to you, and it's timed at
23 10.30. That becomes important later, because at that
24 time I think you were about to go into a meeting with
25 the NHBC, weren't you?

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1 A. Yes, I was, yeah.
 2 Q. Dave White and Graham Smith, I think it is.
 3 A. Graham Perrior, yes.
 4 Q. Graham Perrior.
 5 A. Yes.
 6 Q. Right. He says:
 7 "Jon, please find attached a draft report for
 8 comment only. This is not the final version and as such
 9 is liable to change and has not been through the BRE
 10 quality system. If you have any changes you wish to
 11 include please let me know and I will endeavour to
 12 include them in the final version."
 13 Now, am I right in thinking that was the full test
 14 report, although in draft?
 15 A. I believe so, yes.
 16 Q. Do you know why it took them so long to issue you
 17 a draft?
 18 A. No, I think that was standard practice at the BRE,
 19 I think they were traditionally very slow at issuing
 20 test reports.
 21 Q. Right.
 22 Can we look at the report, it's {CEL00003178}.
 23 That's the first page there on the screen, and it's
 24 called issue 1 and bears a date of 2 June 2014.
 25 If we go to -- yes, we can come to that. That's the

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1 first version.
 2 I think what then happens -- and I'll come back into
 3 that document in a moment -- just chronologically, you
 4 reply to that on 1 July, {CEL00001350}. That's an email
 5 from you to Phil Clark, copied to Paul Evans and
 6 Jamie Hayes, and in the second paragraph there you say:
 7 "I've asked him to send these through to you in my
 8 absence."
 9 SIR MARTIN MOORE-BICK: Sorry, we haven't got it yet,
 10 Mr Millett. Thank you.
 11 MR MILLETT: The first paragraph refers to the updated
 12 drawings, and the second paragraph you say:
 13 "I've asked him to send these through to you in my
 14 absence. Can you please run these by Jamie to check all
 15 the details and send through to Phil @ BRE the relevant
 16 drawings ..."
 17 Then you say Phil is due to go off on leave.
 18 I will come back to that email later on, but in
 19 chronological terms, that's when you made comments,
 20 I think.
 21 If we look at the second email down, over on to the
 22 second page {CEL00001350/2}, this is an email from you
 23 of 1 July to Phil Clark, and you say at the top of
 24 page 2:
 25 "As discussed, please find attached our first draft

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1 comments for our BR 135 test report. Annotations are
 2 highlighted throughout the document and we will send
 3 through the revised drawings to replace figures 4, 5 & 6
 4 once we receive updated details from Simco this week.
 5 "As previously discussed, could you also replace
 6 figure 18 with the attached photographs as we want to
 7 show a close up of the condition of our insulation below
 8 and above fire break with the intumescent fired off. If
 9 you feel you also have a suitable photograph, then
 10 please include."
 11 Now, I'll come back to that in a minute. Just in
 12 chronological terms, that was when you sent that.
 13 Then if you go to {CEL00003234}, if you go to the
 14 second email down on that page, you can see that there's
 15 an email from Phil Clark to you, 30 July 2014, at 11.11:
 16 "Jon, please find attached a PDF (Unapproved) of the
 17 test report as requested.
 18 "Regards
 19 "Phil Clark."
 20 The subject line says:
 21 "Emailing: Celotox(sic) (Draft [Version] 4 for
 22 signing) ..."
 23 You see that?
 24 Now, version 4 came then, but it looks like
 25 version 1 amended from you came to him on 1 July.

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1 Were there any changes to the test report during
 2 July, do you remember, which led to version 4?
 3 A. Were there any changes to ...?
 4 Q. To the test report.
 5 A. Between him initially issuing the draft back in 1 July
 6 and --
 7 Q. Yes.
 8 A. Yes, there were some updated drawings and then there was
 9 this request for a photograph to be removed.
 10 Q. Right. Well, we'll come back to the photographs, but
 11 it's right that the main changes between version 1,
 12 which you then commented on, and version 4 that he sends
 13 back to you at the end of July were changes to drawings
 14 and photographs?
 15 A. Drawings and photographs, yeah.
 16 Q. Yes.
 17 Then if we go to {BRE00005514}, this is the report,
 18 issue 1, dated 4 August 2014 of the classification
 19 report. If you go to {CEL00002008}, this is an email of
 20 11 August.
 21 (Pause)
 22 If you look at the second email down, Debbie Kent
 23 sends you an email on 11 August:
 24 "Dear Jon
 25 "Apologies for the format error, please find

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1 attached re issued report with amendments.”
 2 And that was the classification report.
 3 Is it right that it had to be re-issued because in
 4 places it contained an error message?
 5 A. That’s right.
 6 Q. That was all?
 7 A. Yeah.
 8 Q. I think issue 2 was then sent out with that fixed on the
 9 same day, and that was the only change?
 10 A. Correct.
 11 Q. Right.
 12 It’s right, I think, that the BRE never sent you
 13 a four-page report, isn’t it?
 14 A. That’s right.
 15 MR MILLETT: Right.
 16 Mr Chairman, I think that’s a convenient moment.
 17 We’re going to look next at the full test report in
 18 a little bit more detail.
 19 SIR MARTIN MOORE-BICK: Yes. It probably is a good point,
 20 then, isn’t it?
 21 MR MILLETT: Yes.
 22 SIR MARTIN MOORE-BICK: We will have a break now, Mr Roper,
 23 so we can all get some lunch. I will ask you to be back
 24 at 2 o’clock, please, and not to talk to anyone about
 25 your evidence or anything to do with it over the

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1 adjournment. All right?
 2 THE WITNESS: Fine.
 3 SIR MARTIN MOORE-BICK: Thank you very much. If you would
 4 like to go with the usher, please.
 5 (Pause)
 6 Thank you. 2 o’clock, then, please. Thank you.
 7 (1.02 pm)
 8 (The short adjournment)
 9 (2.00 pm)
 10 SIR MARTIN MOORE-BICK: Right, Mr Roper, ready to carry on?
 11 THE WITNESS: Yes, yeah.
 12 SIR MARTIN MOORE-BICK: Good, thank you.
 13 Yes, Mr Millett.
 14 MR MILLETT: Thank you, Mr Chairman.
 15 Mr Roper, can I ask you to be shown {CEL00001109},
 16 please. This is the 1 August full test report from the
 17 BRE in its final version.
 18 Can we go within that, please, to page 6
 19 {CEL00001109/6}. At paragraph 3.2, under the heading
 20 “Description of the System” in general and specifically
 21 “Description of product”, it says:
 22 “Figure 2 shows the system during construction.”
 23 Do you see that?
 24 A. Yes.
 25 Q. Then it says:

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1 “The system prior to test is shown in Figure 3.
 2 Full details of the system specification and
 3 installation details have been provided by the client
 4 and are summarised in the following section. The
 5 system, as built comprised of ...”
 6 Then there is a long list of bullet points, and you
 7 can see what’s there, but also what’s not there. You
 8 can see that there’s no mention either of the magnesium
 9 oxide, the 6 millimetres magnesium oxide, or the
 10 8 millimetres Marley Eternit cladding, is there?
 11 A. No.
 12 Q. So when it says, “Full details of the system
 13 specification and installation details have been
 14 provided by the client”, that wasn’t true, was it?
 15 A. No.
 16 Q. Now, you say in your statement at paragraph 7.13, if we
 17 can look at that at page 17 {CEL00010052/17}, that you
 18 looked at the draft test report. Now, this is
 19 an earlier draft, and I should just tell you that the
 20 context of this is the meeting that you had with the
 21 NHBC on 19 June 2014, as we will come on to later.
 22 But when you did review a draft test report which
 23 came in from the BRE, did you notice that it didn’t
 24 refer to the 6 millimetres magnesium oxide?
 25 A. I did, yes.

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1 Q. Did you think that they’d not referred to it in their
 2 draft because they hadn’t been told about it, or because
 3 Phil Clark had kept it a secret, or some other reason?
 4 A. So after the second test, generally there’s a period of
 5 two or three weeks where the rig is deconstructed.
 6 Jamie, who wasn’t present at the second test, came down
 7 to the BRE with me and spoke to Phil Clark, and we
 8 looked at it during deconstruction, and it was
 9 Phil Clark’s view that the 6-mil magnesium oxide
 10 wouldn’t have made any difference, and the reason for
 11 the test passing was the increase in the cladding panel
 12 from 8-mil to 12-mil. So I can only assume that he
 13 omitted that detail because of his view on that day.
 14 Q. Do you remember any discussion with Mr Clark to the
 15 effect that he ought to omit that detail?
 16 A. No.
 17 Q. Let’s look at the conversation. We have, I think,
 18 something in that from Mr Hayes’ statement. Can I ask
 19 you to be shown that, please, it’s {CEL00010154/22}, and
 20 look at paragraph 67. He says there:
 21 “At a visit to the rig after the Second Test,
 22 I recall a conversation between PC [Phil Clark] at the
 23 BRE and JR [you] where, when asked by JR, PC agreed that
 24 the rig had passed the Second Test so easily that he
 25 suspected that it would have passed even without the

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1 Additional Material ...”
 2 Pausing there, the additional material is the
 3 6 millimetres magnesium oxide and the 8 millimetres
 4 Eternit panel on the top of it.
 5 A. Yes.
 6 Q. "... just using the thicker cladding. My recollection
 7 of the conversation is that it was led by JR and PC's
 8 opinion in this regard was expressed in agreement with
 9 JR. We were on the second floor in an office looking
 10 down at the Second Test rig; we all got on well with PC
 11 and he was telling us about what it was like to work at
 12 the BRE, including that they had dealt with the burning
 13 of the cows when the mad cow outbreak occurred.”
 14 Do you yourself recall that conversation, as
 15 Mr Hayes has recorded it here?
 16 A. I do, yes.
 17 Q. Is there anything you want to add to what he said there
 18 or are you happy with his recollection as he has
 19 recorded it?
 20 A. I think it's an accurate recollection.
 21 Q. Right, thank you.
 22 SIR MARTIN MOORE-BICK: Well, you could just help us to this
 23 extent: what he's suggesting is that it was you who
 24 expressed the opinion that the test would have been
 25 passed even without the additional material, to which

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1 Mr Clark assented. Is that your recollection, did you
 2 put that forward as the view to take?
 3 A. I think we had a conversation prior to Jamie and I going
 4 down to the test rig, and I can't remember whether that
 5 was directly after the completion of the test or whether
 6 that was when I was on the phone to him re-arranging to
 7 come down, but he had mentioned that to me before, prior
 8 to us attending, and hence I prompted him to relay what
 9 he'd relayed to me before in front of Jamie.
 10 MR MILLETT: Can you explain who made the decision not to
 11 refer to the 6 millimetres of magnesium oxide in the BRE
 12 report?
 13 A. Phil Clark.
 14 Q. Phil Clark.
 15 If we go back to the report, the test report that is
 16 to say, I would like to look at page 7, that's
 17 {CEL00001109/7}, please. Let's look at paragraph 3.3.4.
 18 It says there, under "Rain screen":
 19 "An array of vertical carrier rails were fixed to
 20 the helping hand brackets with both L and T aluminium
 21 brackets used. A single layer of 12 mm Marley Eternit
 22 Natura board was mechanically attached to the carrier
 23 rails with self-tapping stainless steel screws and
 24 washers."
 25 Again, that was not true, was it?

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1 A. No.
 2 Q. In the sense that it wasn't the whole truth, was it?
 3 A. No.
 4 Q. Because there's no reference to the 8 millimetres with
 5 the 6-millimetre magnesium oxide backing in those two
 6 places on the rig?
 7 A. Correct.
 8 Q. Again, who made the decision not to refer to the
 9 8 millimetres of Marley Eternit Natura board in those
 10 locations in this test report?
 11 A. Phil Clark.
 12 Q. Right. Do you remember instructing Phil Clark to do
 13 that, or leaving him to do it and you not correcting
 14 him?
 15 A. Leaving him to do it and, to be honest with you, I was
 16 surprised when the test report came across.
 17 Q. Surprised because?
 18 A. Because he clearly understood the components in full of
 19 the second test and hadn't detailed it in the test
 20 report.
 21 Q. Right. So surprised that he was prepared to conceal
 22 those two elements of the rig, even though in fact you
 23 were prepared to go along with their installation?
 24 A. Yes.
 25 Q. Yes.

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1 Can we look at page 9 {CEL00001109/9} in the same
 2 document. Under paragraph 5, or section 5, which is
 3 entitled "Post-test damage report", there is
 4 a subsection 5.1 which is entitled "External Layer", and
 5 it says:
 6 "A schematic illustration of the damage to the
 7 system is shown in the condition of the cladding system
 8 after the test is shown in Figure 18. It was noted that
 9 the insulation layer continued to burn past the
 10 30 minute with the flaming extinguished at 60 minutes."
 11 Now, note that there.
 12 If you now look at your witness statement, please,
 13 I would like to go to page 18 {CEL00010052/18} in that
 14 document. At paragraph 7.14 at the top of the page, you
 15 say:
 16 "I did not know whether this was normal or not ..."
 17 And the "this" was the presentation.
 18 Perhaps we should go back a little so I can put the
 19 question more fairly to you. I'm so sorry, pick it up
 20 at the foot of the previous page {CEL00010052/17}. This
 21 is the meeting we have just been looking at in June, and
 22 noticing that the first draft of this test report hadn't
 23 referred to the magnesium oxide in the list of
 24 components.
 25 The next sentence is:

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1 "My perception was that the Board had a clear view
2 as to how they wanted to market the product even before
3 the test report was available."

4 So that's the background to the next sentence, where
5 you say, over the page [CEL00010052/18] at
6 paragraph 7.14:

7 "I did not know whether this was normal or not, but
8 was told by Paul Evans that Kingspan were thought to be
9 purposefully omitting information about their BS 8414
10 test from their sales literature. This was Celotex's
11 intended approach. Paul Evans and Paul Reid made it
12 clear in this discussion that Celotex would not correct
13 the information in the BRE test report."

14 Now, at this stage, this is in the context of the
15 19 June meeting that you had had or were having with the
16 NHBC at Celotex's premises in Hadleigh --

17 A. Yes.

18 Q. -- in Suffolk, wasn't it? So when you say this was
19 Celotex's intended approach, was it clear to you at
20 least at that meeting, even though you were simply
21 looking at the draft of the BRE report at that stage,
22 that Celotex were deliberately going to omit information
23 about their BS 8414 test from their sales literature?

24 A. Yes.

25 Q. And that included this test report?

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1 A. Correct, yes.

2 Q. And they were doing so because Kingspan were thought
3 purposefully to be doing the same?

4 A. Yes.

5 Q. Deliberately, that is?

6 A. Yes.

7 Q. Yes?

8 A. Yes.

9 Q. So, to be clear, the real purpose here was to conceal
10 the presence of the 6-millimetre magnesium oxide and the
11 8-millimetre panels from people who might be reading the
12 test report as opposed to from the BRE itself?

13 A. Correct.

14 Q. I see.

15 Then you go on in that paragraph to say:

16 "Paul Reid asked whether anyone was likely to pick
17 it up. There was some discussion about how often
18 potential customers asked for the full test report and
19 the conclusion was that this never happened."

20 When you say "pick it up", "Paul Reid asked whether
21 anyone was likely to pick it up", what was the "it"
22 there?

23 A. Pick up the fact that the details were omitted from the
24 test report, I believe.

25 Q. Right. So the magnesium oxide 6 millimetres and the

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1 8-millimetre panel?

2 A. Correct.

3 Q. Eternit panels.

4 You say that the conclusion reached was that
5 potential customers never asked for the full test
6 report. I'm summarising in a slightly different way
7 what you've written there.

8 Who was it who came to that conclusion?

9 A. I think that was the general view within the business,
10 I referred to on Thursday during my evidence there that
11 what happened quite commonly in the insulation market is
12 that one manufacturer would obtain literature of another
13 manufacturer via third-party distribution. What was
14 clear is that the K15 test report had never been
15 discovered, and I guess people assumed that the only
16 reason that the test report wasn't in circulation was
17 because it was never issued to customers, never asked
18 for.

19 Q. Were you effectively -- I say "you", the three of you,
20 Celotex as the company -- effectively relying on
21 customers' apathy or lack of sophistication in seeking
22 the full test report?

23 A. I think, as was the case with many test reports, at the
24 time Celotex would do their utmost to avoid sending them
25 out.

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1 SIR MARTIN MOORE-BICK: It may be that this is my fault for
2 not understanding something, but at the moment I can't
3 see how any customer could detect the absence of
4 material from the BRE documentation, because what would
5 they have to compare it with?

6 A. Sorry, I don't follow.

7 SIR MARTIN MOORE-BICK: Well, it's suggested here, and you
8 have suggested in your evidence, that customers didn't
9 ask for the full test report, and that you could live
10 with that risk that they might do so and thereby
11 discover that there was information missing from it.

12 What I find it difficult to understand is: how could
13 they ever discover that there had been magnesium oxide
14 boards, for example, on the test rig?

15 A. Because it was never referenced in the -- yeah. Yeah,
16 I see. I don't know, in terms of that. I know that
17 there was a wider discussion not only around the detail
18 of the -- or the description of the test, but equally
19 some photographs that quite clearly to me showed that
20 there was magnesium oxide, and I think maybe that was
21 where the discussion developed to, and the fact that it
22 wasn't referenced in the description, but if you looked
23 at the photographs alongside the test report, you can
24 clearly see -- well, I can clearly see -- the orange
25 8-mil panel actually ends up being shown as a white

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1 board.
 2 SIR MARTIN MOORE-BICK: Those photographs, were they
 3 included in the test report?
 4 A. They were, yes.
 5 SIR MARTIN MOORE-BICK: Right. I can see that, yes.
 6 MR MILLETT: Mr Chairman, we're about to come to those.
 7 SIR MARTIN MOORE-BICK: I'm sorry, again.
 8 MR MILLETT: No, it's fine.
 9 SIR MARTIN MOORE-BICK: I get ahead of you, don't I?
 10 MR MILLETT: In all respects.
 11 Can I just take a slight run-up to this.
 12 Looking at the generalities in paragraph 7.14, was
 13 it the case that, because Kingspan K15 had, you thought,
 14 deliberately concealed material information about their
 15 BS 8414 test in their sales literature and thereby
 16 gained dominance over the above-18-metre market for
 17 insulation, Celotex's plan was basically to follow suit
 18 in order to enter that market?
 19 A. That's the way I understood it, yes.
 20 Q. That's the way you understood it.
 21 I think, is it right, you were asked by Paul Evans
 22 and Paul Reid to ask the BRE to remove the final image
 23 in the test report?
 24 A. That's correct.
 25 Q. Now, let's just look at the draft you were looking at at

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1 this meeting, because I have been showing you the final
 2 version, because in that respect it didn't change, and
 3 indeed it doesn't. But let's look at {CEL00001352}.
 4 This is a draft or the draft of this report dated
 5 2 June 2014. We glanced at it earlier for the purposes
 6 of the chronology we went through before the break.
 7 This is dated 2 June 2014.
 8 If we go to page 33 {CEL00001352/33} -- there are
 9 two pages I want to show you -- that's figure 16. We
 10 will come back to that later. If we go to page 35
 11 {CEL00001352/35}, this is figure 18. Just to be clear
 12 for your benefit and for the Chairman, this became
 13 figure 19 in the final 1 August version of the full
 14 report. So there is no secrets here, this photograph
 15 remained in the final version. But this is figure 18,
 16 and in this report it's the final photograph.
 17 This is a picture of the rig being dismantled, isn't
 18 it?
 19 A. It is, yes.
 20 Q. I think you can see clearly there on the right-hand side
 21 a layer of white material on top of the insulation, just
 22 above the level 2 thermocouples; is that right?
 23 A. Correct, yeah.
 24 Q. I know you don't have a pointer, but for those looking
 25 at this document perhaps for the first time, that's the

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1 white rectangle above the charred material on the right
 2 of the rig; is that right?
 3 A. Yes.
 4 Q. And then there's also white material running along the
 5 top of the rig horizontally from right to left and then
 6 from right to left on the return. Is that also the
 7 6-millimetre magnesium oxide?
 8 A. Yes.
 9 Q. So both of those are showing the white 6-millimetre
 10 magnesium oxide?
 11 A. Correct, yes.
 12 Q. And those would have sat behind the orange 8-millimetre
 13 Marley Eternit Natura boards?
 14 A. Correct, yes.
 15 Q. Right.
 16 Now, if we compare that -- and I think you have
 17 answered this, but it's useful to do it -- if you go
 18 back to page 33 {CEL00001352/33} for comparison purposes
 19 and look at figure 16, the one I was on a moment ago, we
 20 can see that there, while the rig is still burning
 21 post-test, or smouldering perhaps, you can see the
 22 orange strips, and those are the Marley Eternit
 23 8-millimetre panels, aren't they?
 24 A. Yes.
 25 Q. So that's where they were.

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1 Now, is that the image that you say in your
 2 statement at paragraph 7.16 that Paul Evans and
 3 Paul Reid asked you to ask the BRE to remove?
 4 A. This image here?
 5 Q. Yes. I'm so sorry, could we go back to 18 on page 35
 6 {CEL00001352/35}.
 7 A. This image, yes.
 8 Q. Did they ask you to remove that because it would have
 9 drawn attention to the construction of the rig, and
 10 specifically the thickness of the cladding and the
 11 presence of the 8-millimetre cladding and the
 12 6-millimetre magnesium oxide?
 13 A. Yes.
 14 Q. Yes.
 15 Now, if we look at the bottom of figure 18, on
 16 page 35, you can see there is a little speech bubble and
 17 a 1.
 18 A. Yes.
 19 Q. Which looks like a sticky which refers to a footnote.
 20 If you turn the page to page 36 {CEL00001352/36},
 21 please, you can see there there is a note, and it's note
 22 number 1, "Author: J" and then a long number, "Subject:
 23 Sticky Note. Date: 01/07/2014", and there is the note:
 24 "Can we change this image to the one I've attached
 25 with this email to show a close up of horizontal fire

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1 barrier and the insulation below and above the break.”
 2 The email itself is at {CEL00001350}. Here’s the
 3 email to Phil Clark. It’s the bottom of page 1 and over
 4 to the top of page 2 {CEL00001350/2}. It’s the one
 5 I showed you earlier, just before the break this
 6 afternoon. In the second paragraph you say:
 7 “As previously discussed, could you also replace
 8 figure 18 with the attached photographs as we want to
 9 show a close up of the condition of our insulation below
 10 and above fire break with the intumescent fired off. If
 11 you feel you also have a suitable photograph, then
 12 please include.”
 13 Now, the photographs that you attached, I don’t
 14 think there’s any need to go to them, but they didn’t
 15 show the magnesium oxide, did they?
 16 A. No.
 17 Q. The reason you’re giving Mr Clark here is that you
 18 wanted to show a close-up of the insulation above and
 19 below the firebreak. Was that the real reason?
 20 A. No.
 21 Q. What was the real reason?
 22 A. To withdraw any reference to the magnesium oxide board.
 23 Q. Why did you need to give Mr Clark a false reason when
 24 in fact, as you say, he knew the real reason?
 25 A. Because I was instructed to.

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1 Q. By whom?
 2 A. By Paul and Paul.
 3 Q. You were instructed to give him a false reason?
 4 A. Yes.
 5 Q. Even though you knew and -- is this right? -- Mr Evans
 6 also knew that Mr Clark knew the real reason?
 7 A. Hence the final report that came back still included
 8 that photo.
 9 Q. It did.
 10 Do I detect from what you’re saying that you were
 11 instructed by Mr Evans to create a false record of the
 12 reasons why you wanted the change?
 13 A. Yes.
 14 Q. I don’t want to put words in your mouth because it’s
 15 a serious point, but what other explanation can you,
 16 sitting there, give as to why you would give Mr Clark
 17 a false reason?
 18 A. I had to come up with a reason to ask for that
 19 photograph to be omitted.
 20 Q. Is it possible, despite what you have told us -- and
 21 I have to put this to you -- that Mr Clark had no idea
 22 that you wanted to omit the reference to the
 23 6-millimetre magnesium oxide and the 8-millimetre
 24 Marley Eternit boards, and he might have thought that
 25 this was a genuine reason?

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1 A. No, I don’t believe so, and I believe that’s why this
 2 figure 18 subsequently wasn’t omitted from that test
 3 report and was included in the final report.
 4 Q. So you were asking the BRE to remove, in asking them to
 5 remove that picture, the only element of the report
 6 which would show the presence of the additional
 7 material?
 8 A. Yes.
 9 Q. And that was a deliberate attempt, I would suggest, to
 10 create a misleading test report?
 11 A. Yes.
 12 Q. You accept that?
 13 A. I do, yes.
 14 Q. And you say you’re in no doubt that Mr Evans knew that;
 15 is that right?
 16 A. That’s correct.
 17 Q. What about Mr Clark?
 18 A. Mr Clark I think knew that that was a deliberate attempt
 19 to remove that photograph and remove any reference to
 20 the magnesium oxide.
 21 Q. Now, let’s look at paragraph 7.16 of your statement
 22 {CEL00010052/18}. You are there giving your
 23 recollection of a meeting that was taking place with
 24 Paul Evans on 19 June 2014, after the NHBC had left,
 25 about this report. You say there:

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1 “The reason we considered omitting the image of the
 2 cladding from the test report to be a ‘medium risk’ was
 3 because the chances of anyone looking at the full test
 4 report were low. I was asked by Paul Evans and Paul
 5 Reid to request the BRE to remove the final image from
 6 the test report as it would have drawn attention to the
 7 construction of the rig, specifically the type and depth
 8 of panels used, had anyone seen the photograph and
 9 compared it with others in the report.”
 10 Then you go on to say this:
 11 “There was some risk in asking for the deletion in
 12 that it might prompt questions. However, although I did
 13 email the BRE and ask them to replace the photograph
 14 with another one [and we have seen that], the BRE did
 15 not do so in the version of the report which came back
 16 to the business. I discussed this with Paul Evans and
 17 Rob Warren and it was decided not to press the point for
 18 fear of drawing further undue attention to it.”
 19 Undue attention from whom?
 20 A. From the BRE.
 21 Q. But if Phil Clark knew all about it, why would any
 22 attention from him be undue?
 23 A. Erm ... I think ... sorry, can you rephrase that
 24 question?
 25 Q. Yes, if Phil Clark was in on it, as it were, he knew

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1 very well that you didn't want any reference at all in
2 the test report to the 6 millimetres of magnesium oxide
3 or the 8 millimetres of Marley Eternit Natura at the two
4 locations, he knew you didn't want that, what would be
5 the problem with pressing the point?

6 A. That he changed his mind and included it in the
7 description.

8 Q. Right. I see. I see.

9 If we then turn back to the final report as issued
10 on 1 August at {CEL00001109/29}, we can see what has now
11 become figure 19, which is the same photograph as
12 before, a slightly better version of it actually, at
13 least on this draft.

14 So we can take it that the photograph which was
15 figure 18 that you wanted out, as you told Mr Clark on
16 1 July, remained in the final report?

17 A. Yes.

18 Q. And, as you have told us in your statement, that was
19 a risk you were prepared to live with?

20 A. Yes.

21 Q. If we look back at paragraph 7.14 of your statement
22 {CEL00010052/18}, which we've looked at a moment ago
23 with the chairman, discussion about how often potential
24 customers asked for the full test report and the
25 conclusions that this never happened, was the risk that

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1 the business was prepared to run that customers would
2 buy RS5000 without asking for the full test report?

3 A. I think there was a general view within the business
4 that it would be only on limited occasions where
5 somebody would ask for a full test report. As I said
6 previously, I don't think that Celotex would have issued
7 that test report, as they didn't issue any test reports
8 to my knowledge.

9 Q. So was the real risk that the business was to run not
10 a risk to the customer, but a risk to Celotex that, if
11 somebody asked for the full test report and spotted from
12 figure 19 that actually there was an undescribed
13 material lying on the test rig, they would start asking
14 difficult questions?

15 A. Yes.

16 Q. And that was a risk that Celotex was prepared to run,
17 wasn't it?

18 A. Yes.

19 Q. Yes.

20 Can we then go to the classification report,
21 {CEL00002133}. This is the 12-page classification
22 report itself. Now, we have been through the mini
23 chronology with this document. This had an earlier
24 issue date of 4 August with issue 1, and issue 2 was the
25 subject of minor corrections and was issued on

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1 11 August, as we can see.

2 If we look at page 2 {CEL00002133/2} of that
3 document, to start with, it contains a warning, and it
4 says:

5 "This report is made on behalf of BRE Global and may
6 only be distributed in its entirety, without amendment,
7 and with attribution to BRE Global Ltd to the extent
8 permitted by the terms and conditions of the contract."

9 It then goes on and contains various diagrams
10 showing the tested system, and do you accept -- and
11 I can show you the whole of the document if you like --
12 that there is no diagram which shows the presence of the
13 6 millimetres of magnesium oxide?

14 A. That's right.

15 Q. For example, perhaps we can show people who are looking
16 in on this page 6 and page 7. Let's have page 6
17 {CEL00002133/6}, figure 1. If we can blow that up, here
18 is the diagram, "System as tested". If we can get that
19 bigger on the screen so that people can see the diagram,
20 and particularly the bottom left-hand corner.

21 Right, it may not be possible to do this. But
22 you're familiar with this document, and you can take it
23 from me and agree with me that there is no reference in
24 there at all to the 6 millimetres of magnesium oxide?

25 A. That's right.

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1 Q. Nor indeed to the 8-millimetre panels at the second
2 level thermocouple or the top of the rig?

3 A. No.

4 Q. We may be able to do better on page 7 {CEL00002133/7},
5 figure 2. If we can't, we can't.

6 "Construction of the System showing the key layers
7 of the cladding system."

8 We can do better there, in fact. Again, we can see
9 that the aluminium continuous rail, the low profile
10 rivet, 12 millimetres of Marley Eternit Natura panel and
11 100 millimetres of Celotex RS5000. No reference to the
12 magnesium oxide board of 6 millimetres, and no reference
13 to the 8 millimetres of Marley Eternit Natura at the
14 level 2 thermocouples or the top of the rig?

15 A. That's right.

16 Q. So if you take the test report and the classification
17 report and ask yourself, "What did the rig comprise?",
18 they would be consistent, but equally consistently
19 omitting reference to both of those items?

20 A. Yes.

21 Q. Thank you.

22 Now, can I ask you to go to page 11 {CEL00002133/11}
23 in this document. This is section 4 at the bottom of
24 the page, and it says under 4.3, "Observations",
25 "Mechanical Performance". Then in the second paragraph

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1 it says:
2 "The cladding system exhibited localised combustion
3 after the heat source was extinguished at 30 minutes,
4 this continued until it was manually extinguished at the
5 conclusion of the test period at 60 minutes."

6 Now, I'd like, if we can do this, to keep that on
7 the screen there, and then pull up what I showed you
8 earlier but didn't ask you a question about from the
9 full test report, {CEL00001109/9}, paragraph 5.1,
10 because I want to compare the two.

11 That's very helpful.

12 If you can see, on the right-hand side -- I showed
13 you this before -- 5.1, "External Layer", in the second
14 sentence it says:

15 "It was noted that the insulation layer continued to
16 burn past the 30 minute with the flaming extinguished at
17 60 minutes."

18 But on the left-hand side it says:

19 "The cladding system exhibited localised combustion
20 after the heat source was extinguished at 30 minutes,
21 this continued until it was manually extinguished at the
22 conclusion of the test period at 60 minutes."

23 Now, unlike 5.1 on the right-hand side, the
24 classification report doesn't refer to the insulation
25 supporting combustion, does it?

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1 A. No.

2 Q. Do you know why that is?

3 A. No, that's the first time that's ever been brought to my
4 attention.

5 Q. Is that right?

6 A. Yes.

7 Q. Okay.

8 Now, we can put those away and go to your statement
9 again, page 17 {CEL00010052/17} and look at
10 paragraph 7.13, please. Again -- and I'm sorry to keep
11 coming back to this meeting -- this was the meeting of
12 19 June 2014 in your Hadleigh office, and you say here:

13 "There was a short break in the meeting [and that
14 was the meeting with NHBC] whilst I went to print off
15 the draft test report received earlier that morning ..."

16 Just to be clear, that's the first draft of the test
17 report, 2 June.

18 "... and brought it back to Paul Evans' office.

19 Paul Evans, Paul Reid and I looked at it together and
20 noted that it did not refer to the magnesium oxide board
21 in the list of components. My perception was that the
22 Board had a clear view as to how they wanted to market
23 the product even before the test report was available."

24 Now, I've shown you that before.

25 If you go over the page, to page 18 {CEL00010052/18}

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1 and look at paragraph 7.17, at the bottom of the page,
2 you say:

3 "I did not escalate my concerns about the test
4 report beyond the discussion which I had with Paul Evans
5 and Paul Reid on 19 June 2014, as described above. My
6 understanding at the time was that the decision not to
7 refer to the magnesium oxide board had been taken by the
8 Board and I was following instruction."

9 Did somebody tell you that the board had taken that
10 view, or that decision?

11 A. No, I think that was my view after what Paul had
12 discussed with me after the management action group
13 meeting on the 14th.

14 Q. 14 May?

15 A. 14 May.

16 Q. Right, the month before, I see. Did that include a view
17 or your understanding that the board had decided to
18 conceal the full details of the design of the rig for
19 the second test in May 2014 from the test report and
20 indeed the classification report?

21 A. No, because I don't believe -- at the time of the
22 management action group, the test report wasn't --
23 I don't think anybody had seen a draft report of the
24 test report.

25 Q. Right.

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1 Now, we move forward then to {CEL00009724}, please.
2 We can see that the final version of both the test
3 report and the classification report was sent to you on
4 5 August 2014. If we go to page 2 {CEL00009724/2} of
5 that email run, we ought to see that. You can see that
6 on 5 August 2014, Debbie Kent of BRE sends you the test
7 report and the classification report in their full form,
8 copied to Stephen Howard and Tony Baker at the BRE.

9 If we scroll up to the bottom of page 1, we can see
10 that you forward those reports to Paul Evans on
11 11 August 2014, and you ask him a question:

12 "Can we discuss what we want to use as proof that we
13 have passed BR 135 please?"

14 Why did you ask him that question?

15 A. Because those discussions had taken place since the
16 successful result at the second test. As I said,
17 initially all of the concerns were, firstly, how do we
18 pass the test, and then how do we market that and what
19 do we use as proof? I think at the time I probably
20 didn't understand that you got a separate classification
21 report to accompany the full BS 8414 test report. So
22 I was asking him, as it states, what did he want the
23 business to use as proof.

24 Q. I follow. So just to be clear, you were asking him
25 which of those two documents you should use?

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1 A. Yes.
 2 Q. As opposed to: should we use these documents and, if not
 3 these documents, what else?
 4 A. Yes.
 5 Q. So it's the former of those, is it?
 6 A. Yes.
 7 Q. Which of these two documents I should use?
 8 A. Yes.
 9 Q. I see.
 10 Now, he responds to your question higher up page 1
 11 with an email -- just flick up to that, please -- of the
 12 same day:
 13 "Do we have any understanding of what Kingspan do?"
 14 Did you have a discussion with him about that
 15 question?
 16 A. I would suggest I did, yes.
 17 Q. You would suggest you did; do you recall having such
 18 a discussion?
 19 A. I don't recall, no.
 20 Q. Did you answer him? Did you answer his question?
 21 A. I would -- yeah, I would imagine that was a face-to-face
 22 conversation that took place.
 23 Q. Did you come to a conclusion between you as to what you
 24 should in fact use for the purposes of showing potential
 25 customers that you had passed a BR 135 test?

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1 A. Yes.
 2 Q. And what was that?
 3 A. The message was that there was some reluctance to issue
 4 customers with any reports, and that an abridged version
 5 of the BR 135 report should be cut down for use if
 6 pushed by a customer.
 7 Q. I see. A cut down version or an abridged version of the
 8 BR 135 report, so that's the classification report, is
 9 it?
 10 A. Yeah, the shorter --
 11 Q. The 12-page one, not the 35-page one?
 12 A. Yes.
 13 Q. Right.
 14 Now, did you understand at that point that, by
 15 answering your question and you answering his question
 16 in turn, you were both agreeing to follow Kingspan's
 17 approach and to give the customer, any customer, as
 18 little information as you could possibly get away with?
 19 A. I knew that that was going to be their approach, yes.
 20 Q. Whose?
 21 A. Celotex's.
 22 Q. Right, following Kingspan?
 23 A. Yes.
 24 Q. Right.
 25 Now, look at {CEL00002008}, please. This is

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1 an email which we looked at before, and we looked at the
 2 one at the foot of page 1. I now want to show you the
 3 email at the top of page 1. This is from you to
 4 Lizzie Seaton on 14 August 2014 and you say:
 5 "Hi!
 6 "Can you give me a call about this tomorrow morning
 7 please.
 8 "Thanks
 9 "Jon Roper."
 10 Why did you do that?
 11 A. That was because it had been agreed that there would be
 12 an abridged version created, and Lizzie was a ... well,
 13 far more proficient in cutting down a pdf than I was.
 14 Q. Right. So the conversation you wanted to have with her
 15 was about abridging the classification report?
 16 A. Correct.
 17 Q. And she called you?
 18 A. I believe so, yes.
 19 Q. We can see, I think, the results of that at
 20 {CEL00009725}, please. This is an email from her on
 21 15 August, the next day:
 22 "Hi Jonathan,
 23 "As requested by Jon, please find attached the
 24 classification report for RS5000."
 25 This is an email to Jonathan Roome, I think -- well,

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1 we can see that it is -- copied to you. Are you the Jon
 2 in her message?
 3 A. I think so, yes.
 4 Q. Right.
 5 Now, we know that she sends Jonathan Roome
 6 an abridged version of the classification report that
 7 ran to four pages, and we'll look at that in a moment.
 8 Was that what you had asked her to do?
 9 A. Yes.
 10 Q. Let's look at it, {CEL00011965}, please. This is the
 11 document that was attached to that email. I just want
 12 to flick through it with you.
 13 You can see the first page, which is identical to
 14 the classification report in its second version. You
 15 will remember there was a small amendment between the
 16 4 August, issue 1, and the 11 August, issue 2. That's
 17 the first page.
 18 If we look at the next page {CEL00011965/2}, we can
 19 see that you have "Introduction", "Details of classified
 20 product", running to paragraph 2.2.2, and then the next
 21 page, page 3 {CEL00011965/3} in this run, jumps straight
 22 to section 4, "Test reports in support of
 23 classification ". Then the next page on {CEL00011965/4}
 24 is the signature page.
 25 Do you know how this was actually produced, this

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1 document?
 2 A. In terms of software or --
 3 Q. Well, in terms of software or hardware. How did
 4 Lizzie Seaton actually go about producing this four-page
 5 abridged version of the 12-page full version of the
 6 classification report?
 7 A. I believe it was just with a pdf editor or ...
 8 Q. Right. Did you ever see an original version of this?
 9 A. Of the four-page?
 10 Q. Yes.
 11 A. As a hard copy?
 12 Q. As a hard copy.
 13 A. No.
 14 Q. Did you ever try hard to decipher what was at the header
 15 and footer of each of these pages, which has been
 16 obscured by the process of its creation?
 17 A. No.
 18 Q. If you look at the very foot of page 3 {CEL00011965/3},
 19 you can just about make out on the right-hand side, at
 20 the foot of the page on the right, it says "Page 11 of
 21 [something]". It could be 12.
 22 A. Yes.
 23 Q. Clearly the third page of this document was the 11th
 24 page of the original. So it looks to the naked eye, as
 25 best we can observe without the original here, that what

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1 she had done was either make a pdf of this document or
 2 else simply print it all off, pull out the pages she
 3 wanted and make a pdf run of the relevant pages.
 4 A. Yes.
 5 Q. You think that's what she did?
 6 A. Yeah.
 7 Q. How did she know which pages to pull out from the
 8 12-page version and compile into the four-page version?
 9 A. Yeah, that's a conversation I had with Paul, and I'm not
 10 too sure why those four pages were chosen and what was
 11 overly sensitive around the remaining eight pages of the
 12 BR 135 report.
 13 Q. Right.
 14 Do you accept that this four-page version doesn't
 15 even identify the Eternit panel used as the rainscreen,
 16 whether 8 millimetres or 12 millimetres, because it cuts
 17 off at the foot of page 2?
 18 A. No, I didn't realise that, no.
 19 Q. Well, we can go through it. It's quite straightforward
 20 to do that.
 21 If we start with page 1 {CEL00011965/1}, we have the
 22 front page. Let's just do that. Page 2 {CEL00011965/2}
 23 shows you the list of the description of the product,
 24 and you do have 12 millimetres magnesium oxide sheathing
 25 board there, and the 12 millimetres Marley Eternit

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1 Natura panel there.
 2 Then if you go down to the cladding system, where
 3 the details are set out, you don't actually even get the
 4 actual identification of the panels. You do in the
 5 list, I accept, in the bullet-point list, but you don't
 6 under the details of the cladding system. In fact, it
 7 jumps straight to section 4 and has no section 3 at all.
 8 Did you notice when you received this abridged
 9 version that it had this yawning gap in it?
 10 A. No. As far as I was concerned, I knew that the images
 11 of the construction were not present, ie the diagrams of
 12 the construction.
 13 Q. Right.
 14 It also excludes the disclaimer on page 1 of the
 15 full report that I read to you that the report can only
 16 be distributed in its entirety without amendment.
 17 Were the BRE aware that you had created this
 18 document?
 19 A. No, I don't believe so.
 20 Q. Right.
 21 What would be the point of this filleted version as
 22 opposed to the 12-page version? What was it in the
 23 12-page version that you wanted abridged out?
 24 A. Yeah, I don't know what was so commercially sensitive or
 25 confidential about that 12-page report, because from my

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1 knowledge the only contentious issue, ie that photograph
 2 that we discussed earlier, wasn't included in the BR 135
 3 classification.
 4 What I would say is that the majority of the test
 5 reports that Celotex had in the business at the time
 6 were amended in one way or another. I can only refer to
 7 this being one of them. Class 0 reports had black
 8 felt-tip going through certain sections of reports that
 9 were issued as well. So this wasn't uncommon practice
 10 for them.
 11 Q. But I don't think you can answer my question as to the
 12 rationale for omitting the pages from the 12-page
 13 version that are not included in the four-page version?
 14 A. Yeah, I don't know the rationale behind that.
 15 Q. Did you intend that Jonathan Roome should send this
 16 filleted version of the classification report to his
 17 customers if they asked for one?
 18 A. I think that was the point of the abridged report, that
 19 that would be the first report that would go to
 20 customers should they push for those.
 21 Q. Did you send it to the rest of the sales team for them
 22 to send to customers or just to Jonathan Roome?
 23 A. I don't know. I don't know.
 24 Q. Did you know that Jonathan Roome sent this on to Harley
 25 on the Grenfell Tower project on 27 August?

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1 A. I do, I do know that, yes.
 2 Q. Did you know that at the time?
 3 A. No.
 4 Q. Did you know at the time that he was deploying it with
 5 his customers as early as the end of August 2014?
 6 A. No.
 7 Q. In fact, it's right, isn't it, that in late August and
 8 after late August 2014, some customers were specifically
 9 asking for the test report for RS5000?
 10 A. Yes.
 11 Q. So that came pretty quickly after the launch earlier in
 12 August, didn't it?
 13 A. Yes, yes.
 14 Q. If we look at {CEL00010805}, this is an email at the
 15 very foot of the page from Anthony Harris to
 16 Jonathan Roome and to you:
 17 "Good afternoon Guys,
 18 "As per the email from Robbie Taylor below, we are
 19 trying to secure a 6000m2 RS5000 for a large Vinci
 20 Construction project in Stratford, the engineers need
 21 the full test report as the BRE Global Test Report
 22 295255 Issue 2 you sent me has some pages missing it
 23 jumps from points 2.2.2 to 4 and within this is the
 24 information the engineers want to see."
 25 You go back to him the same day and say:

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1 "Anthony,
 2 "Please find attached the full version of BR 135
 3 classification report. I have also attached the
 4 thermocouple data from test report 295255.
 5 "As discussed, there is a full 45 page version of
 6 test report 295255 but the salient information is
 7 replicated in the BR 135 classification."
 8 Did you mean test report 295369 of 1 August 2014,
 9 the full version of which is 33 pages? Is that what you
 10 were referring to?
 11 A. Yes, I believe so.
 12 Q. Right. In fact, it's not correct, is it, that the
 13 salient information was replicated in the BR 135
 14 classification report, was it?
 15 A. No.
 16 Q. Even the 12-page version.
 17 A. No.
 18 Q. And certainly didn't, whether in its filleted version
 19 that Mr Harris had received or the full 12-page version,
 20 include the photograph which was the only thing from
 21 which it was possible to tell that there was
 22 6 millimetres magnesium oxide present.
 23 A. That's correct.
 24 Q. And orange panels.
 25 A. Yes.

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1 Q. Can we go to {CEL00002131}, please. This is the story
 2 in October 2014, and here we see on 17 October, at the
 3 foot of the page, Stephen Howard of BRE writing to
 4 Debbie Berger and you, "Classification report for the
 5 cladding", and he says:
 6 "We had a conversation a while ago regarding the
 7 content of the classification reports and the level of
 8 technical detail they contained (we need to put a lot of
 9 info in, but you don't want your competitors to see it).
 10 "We have come up with a way of doing it."
 11 Do you recall that conversation?
 12 A. I don't, no.
 13 Q. Do you remember what he was referring to by, "We have
 14 come up with a way of doing it"?
 15 A. No, I don't.
 16 Q. Right.
 17 If we look at the top email from Debbie Berger on
 18 20 October, she responds and says:
 19 "Hi
 20 "I'm going to set up a meeting with Steve Howard
 21 early next week ..."
 22 When I say she responds, it's an internal, actually,
 23 to you and Paul Evans and Jonathan Roome.
 24 "I'm going to set up a meeting with Steve Howard
 25 early next week to talk about how to detail our BRE

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1 RS5000 fire report so as it gives the relevant
 2 commercial info without the sensitive stuff. He's got
 3 some ideas that could help us.
 4 "Would you like to come to this meeting. I would
 5 value your input.
 6 "If so will you give me access to your diary so
 7 I can schedule a meeting?"
 8 Do you know what she was talking about when she
 9 referred to the "sensitive stuff"?
 10 A. Yes, I think she was referring to the photograph that
 11 was contained.
 12 Q. Right.
 13 To your knowledge, did Debbie Berger know all about
 14 the presence of 6 millimetres magnesium oxide behind the
 15 8 millimetres Marley Eternit Natura board in the test
 16 rig?
 17 A. I can't say for sure.
 18 Q. If she knew about the photograph -- do you refer to the
 19 photograph at figure 19 in the final report or figure 18
 20 in the draft that you saw, the one that we looked at
 21 before which shows the white panel?
 22 A. Sorry, can you repeat the question?
 23 Q. Yes. When I asked you a moment ago about the "sensitive
 24 stuff", you said, "I think she was referring to the
 25 photograph" --

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1 A. Yes.
 2 Q. -- "that was contained". Is that the photograph that
 3 was figure 18 in the draft report and which became
 4 figure 19?
 5 A. Yes, that's correct.
 6 Q. The one that you and Paul Evans and Paul Reid wanted to
 7 have removed?
 8 A. Correct.
 9 Q. Right. Do you know why she thought that that was
 10 sensitive?
 11 A. Because of the fact that it was 6-mil magnesium oxide
 12 that wasn't referred to in any of the literature --
 13 Q. Right.
 14 A. -- or the test description itself .
 15 Q. Does that tell us that she knew at least this much: that
 16 the test had included a 6-millimetre magnesium oxide
 17 board behind 8 millimetres of Marley Eternit Natura, and
 18 that was, to use her words, a sensitive subject?
 19 A. Yes.
 20 Q. Do you know whether there was a meeting which then took
 21 place with Steve Howard?
 22 A. I don't know.
 23 Q. Did you go to one?
 24 A. I don't believe so.
 25 Q. Right.

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1 Now, I want to go now, at last, to visit the
 2 meeting -- I say at last, I don't mean that's the last
 3 topic, but I say "at last" because we have dipped in and
 4 out of the subject in your statement -- with the NHBC on
 5 19 June 2014, which I think you have covered extensively
 6 in your witness statement at section 7, and we have
 7 already seen quite a bit of that already because we've
 8 dipped into it .
 9 Now, that meeting followed your message to
 10 Graham Perrior and Dave White of NHBC of 15 May, and you
 11 have referred to that in your statement at paragraph 7.1
 12 {CEL00010052/15}. I don't need to show you that
 13 necessarily unless you want to see it .
 14 But did you tell them during that message that
 15 Celotex had passed a BS 8414-2 test?
 16 A. Yes.
 17 Q. I think you did.
 18 A. Yes.
 19 Q. You say that the purpose of the meeting was to discuss
 20 the above-18-metre project, and also some concerns that
 21 NHBC had raised about the quality of another Celotex
 22 product; is that right?
 23 A. Yes.
 24 Q. What was the product?
 25 A. The other product?

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1 Q. Yes.
 2 A. From memory, I believe it was a product for cavity wall
 3 insulation .
 4 Q. Right.
 5 A. Yeah, it's unrelated.
 6 Q. So not an above-18-metre --
 7 A. No.
 8 Q. To set the scene, as I think we now know, you had
 9 received the draft BRE report, version 1, dated 2 June,
 10 half an hour before that meeting began. You got it at
 11 10.30, we've seen that from the emails.
 12 A. Yes.
 13 Q. You say you had only skim-read it before going into the
 14 meeting.
 15 A. Yes.
 16 Q. Do I take it from that that you didn't give them the
 17 draft report at the meeting?
 18 A. No.
 19 Q. Now, if we go to your statement at page 16
 20 {CEL00010052/16}, we can dip into a bit more of your
 21 evidence about that meeting. At paragraph 7.4., you
 22 say:
 23 "No mention was made in the meeting with the NHBC of
 24 the test Celotex had commissioned in February 2014, nor
 25 that a magnesium oxide board had been used to reinforce

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1 the fire barriers in the test conducted in May. After
 2 Graham and Dave from the NHBC had left, Paul Reid and I
 3 reflected on the fact that the NHBC did not seem
 4 particularly impressed and Dave had not been friendly .
 5 The reason they were not impressed was that they thought
 6 the test had been over engineered by using a 12mm
 7 cladding panel in large format."
 8 What did you tell Graham and Dave about the BS 8414
 9 test?
 10 A. What I was told to tell them was that we've used
 11 a 12-mil Marley Eternit rainscreen, tested to BS 8414-2,
 12 and made no reference to the fact that there was a first
 13 test or the fact that the second test consisted of --
 14 Q. Right.
 15 A. -- 8-mil and 6-mil magnesium oxide at certain levels .
 16 Q. Did you show them any documents relating to the
 17 build-up?
 18 A. I don't believe so. I think there was a presentation.
 19 Q. Now, you say that the reason they weren't impressed was
 20 that they thought that the system had been deliberately
 21 overengineered.
 22 A. Yes.
 23 Q. I say deliberately overengineered; overengineered. Did
 24 they think that that was deliberate?
 25 A. Yes.

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1 Q. So did they actually voice that concern?
 2 A. Yes, they did.
 3 Q. Did they explain why they thought that was a problem?
 4 A. They thought it was unreflective of a typical cladding
 5 system.
 6 Q. Did you think yourself that that was a fair criticism?
 7 A. Yes.
 8 Q. Now, following their departure, we know that you then
 9 had a meeting immediately afterwards in Paul Evans'
 10 office, because you go on to say that.
 11 A. Yes, that's right.
 12 Q. Is it right that during that meeting notes were made on
 13 a whiteboard?
 14 A. Correct.
 15 Q. I think we have a photograph of that whiteboard taken by
 16 Paul Evans. If we go to {CEL00002517}, this is
 17 a photograph which he says he took on his telephone.
 18 A. That's right.
 19 Q. Can you confirm that?
 20 A. Yes.
 21 Q. If we look at the whiteboard contents, the top line
 22 headings in the chart that he created are "NHBC
 23 concern/challenge", then a ranking, "CX response",
 24 that's Celotex, "Action required" and "Risk".
 25 Was he the person who put all those columns and

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1 words up on the whiteboard or was it you?
 2 A. No, it was Paul for the majority, other than point 6.
 3 Q. I see. It's slightly different handwriting in point 6;
 4 whose is that?
 5 A. That's mine.
 6 Q. Right.
 7 Now, looking at item 6 under column "NHBC
 8 concern/challenge", it is, "Calcium silicate at
 9 level 2". Is that a reference to the magnesium oxide
 10 layer?
 11 A. Yes.
 12 Q. Why did you put calcium silicate?
 13 A. The terms were used interchangeably in terms of calcium
 14 silicate and magnesium oxide, the --
 15 Q. Clearly you hadn't mentioned the presence of magnesium
 16 oxide to the NHBC at the meeting, and was that for the
 17 same reasons that we have gone through today?
 18 A. Yes.
 19 Q. Could you just articulate those in a sentence?
 20 A. That the message from 14 May, as I've said, was no
 21 reference to magnesium oxide from that point. So I had
 22 to stand up in front of two individuals from the NHBC
 23 and lie, essentially.
 24 Q. Right.
 25 A. And this whiteboard, the description and the responses

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1 and the notes that are surrounded and detailed on that
 2 whiteboard, the first five are concerns that the NHBC
 3 raised at the meeting, and they had obviously a number
 4 of concerns, as you can see, and my comment to Paul in
 5 the presence of Paul Reid was: they're not happy with
 6 how the test has been engineered, and we're not -- we
 7 haven't even disclosed the real test to them, hence the
 8 "Calcium silicate at level 2".
 9 Q. Under "CX response":
 10 "Confidence in fire barriers to expand."
 11 Is that your writing?
 12 A. That is, yes.
 13 Q. Sorry, is that how we should read your writing?
 14 A. Yes, that's right.
 15 Q. That's what it says.
 16 Was that the justification that you would have given
 17 to the NHBC had they found out about the 6 millimetres
 18 of magnesium oxide?
 19 A. Yes.
 20 Q. Or might later ask.
 21 A. Yes, that was --
 22 Q. Who came up with that idea?
 23 A. Paul and I, really. I mean, it was -- looking back at
 24 it now, it's a crap response, it's an excuse to try and
 25 hide the fact that there was calcium silicate there in

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1 the first place, which --
 2 Q. Right. So you were quite content, you and Paul Evans
 3 and Paul Reid, to mislead the NHBC about this?
 4 A. I wasn't content, no.
 5 Q. Well, not content in your heart, but content as a group?
 6 A. The NHBC approval was -- they perceived as critical to
 7 the success of that product.
 8 Q. Yes, so you were prepared to stand up and lie, as it
 9 were, to the NHBC in order to get their approval, which
 10 was critical to the success?
 11 A. Yes.
 12 Q. Okay.
 13 Then under "Action required", it says:
 14 "Remove last image of test report."
 15 Was that a reference to the photograph on page 35,
 16 figure 18, as it then was?
 17 A. That's right, yes.
 18 Q. We know then the story about that.
 19 Looking at "Risk: Medium", on the right-hand side,
 20 you wrote that in, I think, and you say that was because
 21 the chances of anyone looking at the full test report
 22 were low?
 23 A. Yes.
 24 Q. That's what you say in your report. So it was a medium
 25 risk based entirely upon betting on no one asking, in

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1 essence?
 2 A. Correct, yes.
 3 Q. Now, if we move on to {CEL00003180}, please, I just want
 4 to ask you some questions about the plans. We may be
 5 able to take this quite quickly.
 6 This is an email from you to Luke Cresswell and
 7 Graham Smith at Simco on 23 June 2014, and you tell them
 8 in the second paragraph:
 9 "... following our meeting with NHBC they require
 10 our drawing annotations to be technically accurate in
 11 line with what we actually tested. Therefore, we need
 12 file attached above ... to be updated with a 12mm marley
 13 eternity panel shown and a 12mm sheathing board."
 14 It's clear from that that you didn't instruct them
 15 to insert the 6-millimetre magnesium oxide board and the
 16 reference to the 8-millimetre Marley Eternit Natura.
 17 Again, that's for the same reasons, isn't it?
 18 A. It is, yes.
 19 Q. They didn't want the diagrams to give the game away.
 20 A. Correct.
 21 Q. In fact, cutting a long story short, they never did
 22 produce such drawings, did they? They never did produce
 23 drawings which showed either of those things?
 24 A. I don't believe so, no.
 25 Q. And that was deliberate on your part not to ask them to

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1 do so, because you didn't want drawings which did show
 2 those items?
 3 A. Correct.
 4 Q. Can I just then ask you to look at an email slightly
 5 later in the story, in July 2014, at {CEL00000991}.
 6 This is an email of 29 July 2014, at the bottom, page 1,
 7 sent by Craig Chambers to you at 14.48, and he says:
 8 "Jon
 9 "How are we progressing on NHBC approval - I see
 10 this as an important move on this range?"
 11 Do you see that?
 12 Then you responded to him at the top, and let's just
 13 look at the whole email. You say:
 14 "Craig,
 15 "NHBC do not offer an approval as such for this
 16 application but may allow us to use a statement going
 17 forward such as 'Accepted by NHBC subject to conditions
 18 set out in NHBC Standards 6.9'.
 19 Due to delays at the BRE, we are still waiting for
 20 the official test report to be signed off. This should
 21 be with us by tomorrow. Once received, we can then go
 22 back to NHBC with the test report, our finalised product
 23 literature for RS and updated test drawings and
 24 alleviate any initial concerns they had. I have been in
 25 contact with regular updates to them and have informed

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1 them they can expect the report and drawings by close of
 2 play this week.
 3 "The message to the sales team next week on building
 4 control will be we have achieved LABC approval (which
 5 account for 75% of the market) and NHBC is work in
 6 progress but unlike our competitors, we have been
 7 transparent from the beginning."
 8 Now, the claim that Celotex had been transparent
 9 from the beginning was simply not true, was it?
 10 A. No.
 11 Q. Why did you write it?
 12 A. Because that was the message that I was told to relay.
 13 I think that message actually came straight out of the
 14 initial explanation by Paul to suggest that any
 15 references to the 6-mil magnesium oxide should be null
 16 and void. They were happy to progress with trying to
 17 use transparency as a competitive advantage, albeit
 18 there had been completely the opposite.
 19 Q. Right, well, that answers my question which I was going
 20 to ask you next.
 21 Can we then go to {CEL00000992}, which is an email
 22 from you of 30 July where you send to Dave White and
 23 Graham Perrior of the NHBC your final BRE test report.
 24 Now, at this stage I don't think you have actually
 25 received the final version, because the final version

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1 only came in the first few days of August, didn't it?
 2 But you say:
 3 "I'm now in a position to issue you our final BR 135
 4 classification along with the updated construction
 5 drawings and product literature for Celotex RS5000.
 6 Please find these attached."
 7 Then you go on to say:
 8 "We are due to launch this new solution to our sales
 9 team next Tuesday."
 10 Then in the last paragraph, in the last sentence,
 11 you say:
 12 "I apologise for the delay in getting the revised
 13 test report over to you detailing exactly what was
 14 tested but due to holidays at the BRE, timescales were
 15 pushed back slightly."
 16 Your reference there to detailing exactly what was
 17 tested, that's not correct, is it? You weren't showing
 18 them a revised test report showing exactly what was
 19 tested?
 20 A. No.
 21 Q. In fact, what you sent them was seriously lacking,
 22 wasn't it?
 23 A. It was, yes.
 24 Q. Because it didn't have the additional material.
 25 A. It was, yes.

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1 Q. What you sent them was or included the revised drawings
2 we've just been looking at, and I don't need to go back
3 to those because they're difficult to read on the
4 screen, but we know that those drawings did not include
5 reference to the 6 millimetres of magnesium oxide or the
6 8 millimetres of Marley Eternit Natura, did they?
7 A. That's correct.
8 Q. No. So in sending what you were sending to the NHBC at
9 this stage, you were taking a chance, weren't you, that
10 they might spot something amiss from the photograph at
11 figure 18?
12 A. Yes, I guess so, yes.
13 Q. To be fair to you, I'm just wondering whether that's
14 right, because you're sending them the classification,
15 which I think doesn't have the photograph in it --
16 A. No.
17 Q. -- but not the test report. So in the last sentence,
18 perhaps you can help me, when you say "I apologise for
19 the delay in getting the revised test report over to
20 you", were you referring to the test report or were you
21 referring simply to the classification report?
22 A. I think it's the classification report.
23 Q. Right, I see. In fact, therefore, my question wasn't
24 correct; there was no chance that they would spot
25 something in this because they wouldn't see the

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1 photograph.
2 A. No.
3 Q. Did you ever send the NHBC the full classification
4 report including figure 19 with that photograph?
5 A. I don't believe I did, no.
6 Q. Do we take it from that that you were very alive to the
7 risks that, if you did so, they would certainly spot or
8 would be very likely to spot the presence of something,
9 a white panel, and ask questions about it?
10 A. Yes.
11 Q. I now want to turn to a different topic altogether,
12 which is the marketing of RS5000.
13 SIR MARTIN MOORE-BICK: There's one question that's slightly
14 troubling me, which I did not want to interrupt your
15 flow to ask, but I would quite like to get some help on
16 it, and it concerns what prompted Mr Clark to issue the
17 BRE's first version report not making any reference to
18 the magnesium oxide board or the 8-millimetre
19 Marley Eternit.
20 Really what I would like your help on, Mr Roper, is:
21 did you have any conversation yourself with Mr Clark
22 which, either expressly or by way of what one might call
23 a nod and a wink, indicated to him that Celotex did not
24 want any reference made to those parts of the rig in any
25 report?

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1 A. No, because I don't believe at the time that -- I think
2 regardless of whether that test report came across with
3 the correct description, as I was fully expecting it to,
4 I think they would have just attempted to conceal that
5 test report from the market altogether. I think when it
6 came across omitting the magnesium oxide and the 8-mil
7 Marley Eternit from the description, the focus was then:
8 can we remove this --
9 SIR MARTIN MOORE-BICK: I see, once you had got that report,
10 but what I would be interested to know is whether you
11 did anything or said anything to Mr Clark in the course
12 of the various conversations you had with him to lead
13 him to think that Celotex did not want any reference
14 made to those parts of the test rig?
15 A. No, and I think the only thing that perhaps I implied
16 was I did -- once he'd commented on the fact that the
17 6-mil magnesium oxide perhaps wouldn't have made
18 a difference to the result, I think, looking back at it
19 now, the only time that I sort of asked him to
20 re-emphasise that was when Jamie came to the test rig.
21 But, no, I didn't try and manipulate him to omit
22 a description of a test.
23 SIR MARTIN MOORE-BICK: Right. So, as far as you're aware,
24 he did it of his own initiative, did he?
25 A. He did, yes.

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1 SIR MARTIN MOORE-BICK: All right. Thank you very much.
2 Do you want to follow that up at all, Mr Millett?
3 MR MILLETT: No, Mr Chairman, that is consistent with the
4 answers that I got earlier, I think, on near enough the
5 same topic.
6 SIR MARTIN MOORE-BICK: All right, thank you. Well, I just
7 wanted to clarify that.
8 MR MILLETT: Yes, thank you.
9 Mr Roper, can I just go back on something, because
10 I may have inadvertently led you down a blind alley, and
11 I apologise if I have.
12 Keep an eye on this email, where you say in it, "I'm
13 now in a position to issue you our final BR 135
14 classification ... and product literature", and then you
15 refer to the revised test report in the last paragraph.
16 In fact, if you go to {CELO0000993}, I think we can
17 see what it is you attached to this email, if we just go
18 to that. You can see there that this is the
19 30 July 2014 global test report, which becomes the
20 1 August version as final.
21 So it looks as if what you were sending him -- and
22 we've had to work this out by a documentary route that
23 is not immediately obvious -- but I think you have to
24 take it from me that what you were sending him was
25 indeed the global test report.

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1 A. Okay.
 2 Q. Which does include the photograph.
 3 A. Okay.
 4 Q. So, to be fair to you, that's actually the correct way
 5 of looking at the record.
 6 Do you remember sending the NHBC this document?
 7 A. No, I don't.
 8 Q. Right.
 9 I think my question then comes back to the same
 10 question: in sending the NHBC this document, were you
 11 taking the risk that somebody at the NHBC might spot
 12 a strange-looking white panel in what became figure 19
 13 and ask questions about it?
 14 A. Yes.
 15 Q. Was that a risk that you had discussed with Paul Evans?
 16 A. I think post our meeting it was clear that the NHBC had
 17 numerous concerns without understanding the true system
 18 details and, from Paul's side and from the business's
 19 side, they saw the NHBC's approval as critical, and
 20 I can only imagine that I've sent this report because
 21 that's what's been requested from either Dave White or
 22 Graham Perrior.
 23 Q. We saw on the whiteboard the allocation of risk under
 24 item 6 to this problem being medium. Was the assessment
 25 of a medium risk relating to the risk of the NHBC coming

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1 back and asking questions?
 2 A. I think that was a general medium risk of issuing that
 3 report to anybody.
 4 Q. Right.
 5 Can we then go to the marketing of RS5000. If we go
 6 first, please, to {CEL00003125}, this is an email from
 7 Mr Evans, Paul Evans, to you on 27 May 2014, saying:
 8 "Just a quick note to request we get 5mins tomorrow
 9 to discuss approach with Jonathan on Friday.
 10 "If I send this, there's a chance between us we
 11 won't forget!"
 12 Is Jonathan Jonathan Roome there?
 13 A. No, I don't believe it is, I think it's Jonathan of
 14 Saint-Gobain.
 15 Q. Oh, right. Jonathan who?
 16 A. Jonathan Cheeseman, he's a legal representative from
 17 Saint-Gobain.
 18 Q. Right, I see. So this has nothing to do with marketing
 19 then, has it?
 20 A. It has got something to do with the marketing, yes,
 21 I think Paul had a conversation with Jonathan Cheeseman
 22 at Saint-Gobain to run the literature by him.
 23 Q. Right. As early as May 2014?
 24 A. I believe so, yes.
 25 Q. Do you know what was said?

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1 A. No, I wasn't present at that meeting. I will say --
 2 what I do know is that from that meeting that took
 3 place, the disclaimer around the onus on the -- is on
 4 the building control or building owner, which is
 5 referenced in the marketing literature, came from that
 6 meeting, I believe.
 7 Q. Thank you.
 8 Can we then move to {CEL00009598}, please. This is
 9 an email from Lizzie Seaton to you on 16 June 2014,
 10 forwarding to you an email she had received from
 11 Kelly Slociak, which says in the middle of the page
 12 there:
 13 "Hi Lizzie
 14 "Please see attached the first draft of the RS5000
 15 press release for your approval."
 16 She is sending that to you for your thoughts.
 17 If we look a little bit lower down to page 2
 18 {CEL00009598/2}, we can see how this begins on 12 June.
 19 You send Lizzie Seaton:
 20 "... a few salient points that should help CFA start
 21 to put together a first draft of the press release for
 22 RS5000."
 23 In the long list of bullet points there, you see
 24 that you say in the fifth bullet point:
 25 "Celotex RS5000 also benefits from having

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1 successfully tested and approved to BS 8414-2:2005,
 2 meets the criteria set out in BR 135 and is therefore
 3 acceptable for use in buildings above 18m in height."
 4 Now, that language, do you remember where you got
 5 that from?
 6 A. It was taken directly from Kingspan's literature.
 7 Q. Yes. I was wondering about that. Perhaps I should show
 8 you that.
 9 Can you please be shown {CEL00008510}. This is
 10 a Kingspan document called "Kooltherm K15 Rainscreen
 11 Board, insulation for rainscreen cladding systems". If
 12 you look at the third bullet point down, it says:
 13 "Successfully tested to BS 8414:2002, can meet the
 14 criteria within BR135 and is therefore acceptable for
 15 use above 18 metres."
 16 Is that where you got your wording from?
 17 A. Yes.
 18 Q. You'll note that it's dated March 2011.
 19 A. Yes.
 20 Q. So you're three and a half years down the track.
 21 A. Yes.
 22 Q. Do you know whether that language that you had taken
 23 from that document changed between the March of 2011 and
 24 your using it in the June of 2014?
 25 A. I don't believe it did.

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1 Q. Right.
 2 Going back to your email, if we can,
 3 {CEL00009598/2}, please, you don't, after that reference
 4 there in that bullet point, suggest that attention
 5 should be drawn in the marketing literature to the
 6 limits of the BS 8414 test, do you?
 7 A. No.
 8 Q. Why is that?
 9 A. Because that had been discussed that the prominent
 10 message would be just that fifth bullet point, really,
 11 that it's successfully tested and approved, and as
 12 I said before, I had a feeling very early on in the
 13 development that the message around systems would be
 14 diluted, and that sort of became apparent during the
 15 launch process, really.
 16 Q. So diluted, does that mean that -- let me try it
 17 differently.
 18 You can see the words "and is therefore for
 19 acceptable for use in buildings above 18m in height".
 20 Did you intend to give the impression to the reader of
 21 that bullet point that, because Celotex had passed this
 22 test, it could therefore be used in buildings generally
 23 above 18 metres in height?
 24 A. I think that's what they wanted to convey, yes.
 25 Q. But you wanted to convey with your words? They're your

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1 words; yes?
 2 A. Under instruction from that business.
 3 Q. I understand that. I understand that qualification.
 4 But the answer to my question is yes?
 5 A. Yes.
 6 Q. And that's what you mean by dilution, is it?
 7 A. Yes.
 8 Q. Then you say in the penultimate bullet point:
 9 "Supported by LABC Approval & acceptable for use on
 10 NHBC projects."
 11 In fact, is it right that the LABC at this stage --
 12 this is mid-June 2014 -- hadn't yet issued registered
 13 details?
 14 A. I'm not sure of the exact dates, but that would have
 15 just been put forward -- I don't know when the launch
 16 was actually planned, but it would have been put forward
 17 as an optimistic achievement.
 18 Q. Right, an optimistic achievement. And even more
 19 optimistic was the statement that it was acceptable for
 20 use on NHBC projects.
 21 A. Correct.
 22 Q. And given the dates, you hadn't even yet had your
 23 19 June meeting with the NHBC, let alone the discussion
 24 with them about the report, had you?
 25 A. That's right.

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1 Q. No.
 2 If we look at {CEL00009599}, we can see that all of
 3 these bullet points, including the two I've identified
 4 to you, were all picked up in the press release.
 5 Did you draft this press release?
 6 A. No, I don't believe I did.
 7 Q. Do you know who did?
 8 A. I think the majority of the press releases came from
 9 an external agency.
 10 Q. Right. Did you ever check it? Did you ever check this
 11 document?
 12 A. I would have checked it, yes, alongside Paul.
 13 Q. We will come back to it in a moment, because I have
 14 a number of points on it, but am I right in thinking
 15 that your wording you gave to Lizzie Seaton finds its
 16 home in this press release in the second and fourth
 17 paragraphs, because we can see that it says there -- in
 18 the second paragraph you refer to the tests, and it
 19 says:
 20 "... making it acceptable for use in buildings above
 21 18 metres in height."
 22 So, again, that's another way of putting the same
 23 Kingspan-originating dilution of the message; yes?
 24 A. Correct, yes.
 25 Q. Then in the penultimate paragraph, you say:

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1 "Supported by LABC Approval and acceptable for use
 2 on NHBC projects ..."
 3 So leave aside the LABC approval, it was simply not
 4 true that it was acceptable for use on NHBC projects,
 5 was it?
 6 A. Not at that stage, no.
 7 Q. No.
 8 SIR MARTIN MOORE-BICK: Mr Millett, we probably ought to be
 9 giving Mr Roper a break.
 10 MR MILLETT: Absolutely, let's do that.
 11 SIR MARTIN MOORE-BICK: It's probably not a very convenient
 12 point, but I don't suppose there will be a better one,
 13 will there?
 14 MR MILLETT: There is no self-evident mooring point in the
 15 near future.
 16 SIR MARTIN MOORE-BICK: All right.
 17 I think we will have a break at this point,
 18 Mr Roper. We will come back at 3.40, and please
 19 remember not to talk to anyone about your evidence while
 20 you're out of the room.
 21 THE WITNESS: Okay. Thank you.
 22 SIR MARTIN MOORE-BICK: Would you like to go with the usher,
 23 please.
 24 (Pause)
 25 Right, 3.40, then, please.

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1 (3.25 pm)
2 (A short break)
3 (3.40 pm)
4 SIR MARTIN MOORE-BICK: Ready to go on, Mr Roper?
5 THE WITNESS: Thank you, yes.
6 MR MILLETT: Mr Roper, can I just revisit one question with
7 you, and that's your request to the BRE on 1 July 2014
8 to remove the photograph at figure 18 in the then draft.
9 Do you remember the photograph --
10 A. Yes.
11 Q. -- figure 18?
12 Do you remember, having asked BRE to remove that
13 photograph, whether they actually gave you a response?
14 A. I don't believe they did, no.
15 Q. So you don't remember ever getting a reaction from the
16 BRE as to why they wouldn't remove it, as we know they
17 didn't?
18 A. No, I think the next correspondence was the next draft
19 or the version of the test report.
20 Q. On 30 July?
21 A. I believe so, yes.
22 Q. By that stage, as I think you've told us, you had
23 already decided with Mr Evans not to press the point?
24 A. Correct.
25 Q. Right.

1 Can we then go back to the marketing literature, and
2 I have shown you the press release which we will come
3 back to. Can I go to {CEL00001213}, please. This is
4 an email from you to Paul Evans on 1 July 2014, and you
5 attach a marketing action plan, and you say:
6 "As discussed folder J.Roper under M Drive has
7 everything to do with RS in.
8 "Thanks."
9 It's a bit of a cryptic message, but let's look at
10 the document. It's at {CEL00001214}, please. We can
11 see there that the front page, first page, is:
12 "Marketing Action Plan.
13 "Product: Celotex RS5000.
14 "Launch date: 5th August 2014."
15 Did you draft this document?
16 A. I believe I did, yes.
17 Q. Did you do it with anybody or was it just you?
18 A. Most likely with Paul, because by the looks of it this
19 is the first marketing and the only marketing action
20 plan I think I ever carried out.
21 Q. Right. So you think you drafted it with Paul. Did you
22 do the first draft or did he?
23 A. I don't know. I think he would have probably explained
24 what a marketing action plan looked like and he would
25 have probably ran through the details with me initially

1 because it's the first time I'd have seen that.
2 Q. Right.
3 If we look at "Objectives", it's the first item, on
4 page 2 {CEL00001214/2}, please, the first item there is
5 to:
6 "Launch Celotex RS5000 at northern and southern
7 regional meetings week commencing 4th August, 14."
8 Then you go on to say:
9 "Leverage Celotex' 5000 series and its associated
10 performance benefits into new market opportunities."
11 Then you say:
12 "Present RS5000 as Celotex' primary rainscreen
13 application offering to compete directly with
14 Kingspan K15 & Rockwool Duo-Slab."
15 Then the last bullet point:
16 "Leverage Celotex RS5000 to campaign Celotex' focus
17 on third party certification."
18 Just on that, what does campaigning Celotex's focus
19 on third-party certification mean? What does that mean?
20 A. Yeah, so it was the same from when I joined the
21 business, really, they -- the only way that -- or one of
22 the ways that they tried to differentiate from other
23 insulation manufacturers was by having third-party
24 approvals. There were a lot of manufacturers in the
25 marketplace that didn't have too many third-party

1 approvals, and that was one of their competitive
2 advantages as they saw it.
3 Q. And the third-party approval would be something from the
4 LABC or the NHBC or the BBA?
5 A. Or BBA, or -- yes, yeah.
6 Q. Then under "Concept", if you look a little bit lower
7 down the page, you can see that there is a proposition:
8 "The first PIR insulation board tested and approved
9 to BR 135 and therefore acceptable for use in buildings
10 above 18m in height."
11 Again, that is the same dilutive mantra, if you
12 like --
13 A. Yes.
14 Q. -- that you got from the Kingspan datasheet and now
15 finds its way into the marketing action plan.
16 A. Correct.
17 Q. With the same misleading impression.
18 A. Correct.
19 Q. Then you see you say, "Positioning", second bullet
20 point:
21 "Class 0 fire performance & tested on a typical
22 rainscreen cladding system to BS 8414."
23 That's incorrect, isn't it, because there was
24 nothing typical about using 12-millimetre fibre cement
25 board as the rainscreen panel, was there?

1 A. No, there was nothing typical about using the 6-mil
2 magnesium oxide, yes.
3 Q. Right, okay, nothing typical about using 6-millimetre
4 magnesium oxide, absolutely. What about nothing typical
5 about using 12-millimetre fibre cement board as the
6 rainscreen panel, or was that more typical?
7 A. I think that was deemed as more typical, yes.
8 Q. Right.
9 Then if we can look at the marketing material
10 itself, is it right that the main pieces of marketing
11 material were the specification guide and the rainscreen
12 cladding compliance guide? There were others, and we
13 will look at those, but those were the two main ones; is
14 that right?
15 A. Yes.
16 Q. Were you involved in producing the wordings for those?
17 A. I believe I was, yeah, within a team that consisted of
18 the entirely marketing team and a few members of the
19 technical team as well.
20 Q. Was there anybody in the marketing team that you knew
21 who knew more about the testing and the classification
22 of the RS5000 than you?
23 A. I wouldn't say there was anybody that knew more, but
24 equally there were at least three individuals in the
25 room that knew as much.

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1 Q. Who were they?
2 A. Jamie, Rob and Paul.
3 Q. Right, okay. You're including them in the marketing
4 team?
5 A. Correct.
6 Q. Jamie is Jamie Hayes?
7 A. Correct.
8 Q. Can we go to {CEL00003179}, please. This is something
9 called a "Comms action plan" for the launch date
10 5 August, and you can see there that there are seven
11 sections to it, and the third one is "Communication
12 activities".
13 Can we go to page 4 {CEL00003179/4}, please. On
14 that page we can see, second item down:
15 "Rainscreen Cladding Specification Literature.
16 ." Writing content."
17 And then two initials: JH and JR. That's
18 Jamie Hayes, is it, and you?
19 A. Correct, yes.
20 Q. So do we take it from that that the responsibility for
21 drafting or wording the rainscreen cladding
22 specification literature was yours and Mr Hayes?
23 A. Correct, yes.
24 Q. Right.
25 If we go to {CEL00000012}, please, we can see the

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1 compliance guide. This is the version as finalised. If
2 we go to page 2 {CEL00000012/2} in that, please, you can
3 see that it sets out at the top of the page some text
4 which says:
5 "This document provides guidance on complying with
6 Approved Document B2 (AD B2) for external wall cladding
7 systems fixed to steel frame or masonry constructions.
8 It provides a step by step guide to an alternative route
9 to compliance for AD B2 through meeting the performance
10 criteria set out in BR 135 through testing to
11 BS 8414-1:2002 or BS 8414-2:2005."
12 Now, it expressly says there, as we can see, that
13 it's a step-by-step guide to compliance, and if we go to
14 page 3 {CEL00000012/3}, we can see the steps. "BR 135"
15 is there on the top left-hand corner, and then the
16 performance criteria are there set out, and then if you
17 look at the far right-hand column in the guide, it says
18 this under the three pink arrows:
19 "The classification applies only to the system as
20 tested and detailed in the classification report. The
21 classification report can only cover the details of the
22 system as tested. It cannot state what is not covered.
23 When specifying or checking a system it is important to
24 check that the classification documents cover the
25 end-use application."

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1 Did you see and approve that language?
2 A. Erm ... I don't believe I did. I think I've seen that
3 from ... I don't know, I thought the disclaimer came
4 from Saint-Gobain legal, but I may be incorrect.
5 Q. Right. Okay.
6 Did you know that it reflected the language in
7 annex B of BR 135?
8 A. Erm ... no.
9 Q. Oh, okay.
10 Did you at the time read that, when you saw either
11 this final version or an earlier draft of it, and note
12 the disclaimer, as you call it?
13 A. Yes.
14 Q. You did?
15 A. Yes.
16 Q. Did you have any doubts about what it meant?
17 A. No.
18 Q. Was it quite clear to you, looking at what you call the
19 disclaimer and what I think I have called with Mr Roome
20 the caveat -- it doesn't matter which we call it -- that
21 the BR criteria and the BS 8414 test was for
22 a full-scale test of a system and not for a product in
23 application?
24 A. Correct.
25 Q. Did you see any wiggle room for any interpretation of

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1 this language to suggest that a building designer could
 2 use RS5000 with any component of a system other than
 3 what was tested and still be covered by the
 4 classification report?
 5 A. No.
 6 Q. Does that answer apply to this same statement in all the
 7 other marketing literature used by Celotex to market
 8 RS5000?
 9 A. Yes, yeah, I think it stems from -- back from the
 10 commercial versus technical argument. I think there
 11 were certain individuals that wanted this to be more
 12 prominent than others.
 13 Q. Right. And it looks -- well, you tell me. Looking at
 14 this disclaimer here in its place in this document, who
 15 won the argument, commercial or technical?
 16 A. On this page? Technical.
 17 Q. How do you account for it being on page 3 of this
 18 document as opposed to the first page?
 19 A. Erm ... sorry, can you rephrase?
 20 Q. Well, let me try it differently .
 21 Did you regard this as small print to be found only
 22 by the most scrupulous readers of this document, or did
 23 you think this was a fair presentation and location of
 24 the disclaimer, as you have called it?
 25 A. Yes, I think it was fair .

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1 Q. Right.
 2 Now, you can see if you look on to page 4
 3 {CEL00000012/4} of this document the middle column which
 4 sets out the system that was tested, and we've got the
 5 by now familiar list of parts of the system: you have
 6 got the 12-millimetre fibre cement panels, those are the
 7 Marley Eternit 12-millimetre panels, the rails, the
 8 Celotex, the 12-millimetre sheathing board, the SFS
 9 system and the plasterboard, but no reference there to
 10 the layer of 6-millimetre magnesium oxide or the
 11 8 millimetres of Marley Eternit Natura over it, is
 12 there?
 13 A. No.
 14 Q. Again, if we look at diagram 4 below, do you accept that
 15 that doesn't show the layer of 6 millimetres magnesium
 16 oxide or the 8 millimetres of Marley Eternit?
 17 A. Correct.
 18 Q. Do you accept that those omissions make the statement of
 19 what the system tested was and the drawing thoroughly
 20 misleading?
 21 A. Yes.
 22 Q. And there is no mention of the 8-millimetre Eternit in
 23 the same location, so does that tell us that the
 24 statement "12mm Fibre Cement Panels" is also misleading,
 25 because in the two locations we've seen from the

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1 photograph, those panels were 8 millimetres over
 2 6 millimetres of magnesium oxide, making 14 millimetres?
 3 A. Correct.
 4 Q. So, again, thoroughly misleading in that respect?
 5 A. Yes.
 6 Q. So any designer looking to follow your words of warning,
 7 Celotex's words of warning, and to replicate exactly the
 8 cladding system that Celotex was describing here in this
 9 marketing literature as having passed this test would
 10 in fact be designing a cladding system that had not
 11 passed.
 12 A. Correct, yes.
 13 Q. Those omissions and misdescriptions were not accidental,
 14 were they?
 15 A. No, they weren't.
 16 Q. They were entirely deliberate .
 17 A. Yes, they were.
 18 Q. If you had faithfully described the test components as
 19 actually used, it would have given the game away as to
 20 how the pass had been achieved, wouldn't it?
 21 A. Correct.
 22 Q. And the actual system that had passed was not
 23 commercially viable, at least as a competitor to K15.
 24 A. That's right .
 25 Q. Do you accept that, in approving this document, you were

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1 dishonest?
 2 A. I do, yes. As I said earlier, I felt entirely
 3 uncomfortable, but equally useless in the whole lead-up
 4 from testing through to marketing through to launch. It
 5 was one of the contributory factors for me leaving my
 6 role as product manager, because I'd felt so
 7 uncomfortable to date with what was being published and
 8 what was being launched, and I knew there was going to
 9 be a level of questioning that came into the business
 10 post-launch that would essentially mean that I would
 11 have to lie for commercial gain again. So I left my
 12 role as product manager and moved into area sales.
 13 Q. Right.
 14 Again, just on this, was there nobody you could go
 15 to within Celotex and, as it were, blow the whistle or
 16 take your concerns to?
 17 A. This was common practice. I didn't know -- I didn't
 18 know it at the time. As I said, all of the members of
 19 the management action board I believed were present when
 20 Paul presented the truth and the decision was made.
 21 Subsequently I've heard and seen that this isn't the
 22 only manipulation of test data that that business has
 23 had. I think there are issues around the class 0 fire
 24 report, I think there are issues around the thermal
 25 performance of their entire product range. It was

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1 clearly within the culture of that business at that
 2 time, and I'm sorry for my part in it. It's something
 3 that I should have maybe -- well, definitely expressed
 4 more of a concern about.

5 Q. Let's look at the specification guide, {CEL00000013/5},
 6 please, it says, under the heading "Building above
 7 18 metres":
 8 "Celotex RS5000 has been successfully tested to
 9 BS 8414-2:2005 ..."

10 And again underneath that, after the brackets:
 11 "... meets the criteria set out in BR 135 and is
 12 therefore acceptable for use in buildings above
 13 18 metres in height."

14 Again, we see the mantra there, so lifted from
 15 Kingspan's K15 March 2011 datasheet straight into your
 16 specification guide.
 17 It goes on to say:
 18 "The system tested ... was as follows ..."

19 And, again, no mention there of the 8 millimetres of
 20 Eternit or the 6 millimetres of magnesium oxide.
 21 The same questions again: and you knew that, and
 22 that was dishonest, for the same reasons we've discussed
 23 in relation to the specification guide?

24 A. Correct, yes.

25 Q. Again, that was deliberate?

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1 A. It was, yes.

2 Q. Yes. If you look at page 3 {CEL00000013/3} -- and in
 3 a way, these are similar iterations of the same point --
 4 in the last paragraph there, it says:
 5 "... RS5000 is uniquely positioned to help meet
 6 these goals. Celotex RS5000 is a premium performance
 7 PIR solution for use in rainscreen cladding applications
 8 and suitable for use in building above 18 metres in
 9 height."

10 Again, that was misleading, wasn't it, because it
 11 suggested that RS5000 could be used in any buildings
 12 above 18 metres in height?

13 A. That's right, yes.

14 Q. And that was intentional and deliberate and misleading?

15 A. Correct.

16 Q. Then at page 5 {CEL00000013/5} again, the same mantra we
 17 see in the last part of the paragraph above the details
 18 of the test, "therefore acceptable for use in buildings
 19 above 18 metres".

20 Again, the same question: that also might lead
 21 a reader to believe that RS5000 was suitable generally
 22 in combination with any system and be misled by that?

23 A. That's right, yes.

24 Q. And again, that was deliberate?

25 A. Correct, yes.

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1 Q. I think Celotex drafted or produced a handy guide to its
 2 products, didn't it?

3 A. It did, yes.

4 Q. Were you familiar with that document?

5 A. I was, yeah.

6 Q. That's at {CEL00000437/8}, "Product descriptions", and
 7 here we have Celotex RS5000. It says it has "Class 0
 8 fire performance throughout the entire product". Then
 9 in the second paragraph it says it's acceptable for use
 10 above 18 metres in height, after the reference to the
 11 BR 135 criteria.

12 Again, that gives the impression that RS5000 is
 13 generally suitable for buildings above 18 metres in
 14 height. So, again, do you accept that it was deliberate
 15 and dishonestly misleading?

16 A. I do, yes.

17 Q. Now, you referred a moment ago to this being a common
 18 problem throughout Celotex with class 0 as well. What
 19 were the problems around class 0 that you were referring
 20 to?

21 A. I don't know the specifics, all I know is I've seen
 22 announcements on the website since the tragic events of
 23 Grenfell that indicated that they've perhaps come clean
 24 about a couple of other issues, one being class 0 and
 25 one being thermal performance, but I don't know the

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1 specifics.

2 Q. Right. You say thermal performance; is that a reference
 3 to the shenanigans with the lambda?

4 A. Correct, yes.

5 Q. I'm sorry to use that expression, but it will become
 6 obvious perhaps with other witnesses what that was, but
 7 you were familiar with that, were you?

8 A. I was familiar with the announcement, yes, I wasn't
 9 familiar with the ...

10 Q. Right.

11 Can I then show you the datasheet, {CEL00007961}.

12 This is another one of Celotex's marketing documents.
 13 Was this a document that you had a hand in drafting?

14 A. Probably, again, with the same, the same individuals.
 15 It was, yeah, the marketing team, the technical team.

16 Q. Was this a document that you would or you did intend to
 17 send out as part of Celotex's marketing efforts for
 18 RS5000?

19 A. That would have been distributed, yes.

20 Q. If we look at this document -- it's not a long document,
 21 only three pages -- we can see there is a pink header at
 22 the top of each page that reads:
 23 "Celotex RS5000
 24 "Premium Rainscreen Cladding Board
 25 "(suitable for buildings above 18 metres in

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1 height).”
 2 That is repeated in the pink banner at the top of
 3 all three pages of this three-page document, isn't it?
 4 A. Yes, that's right.
 5 Q. There is no qualification there to this thrice repeated
 6 statement, and taken at face value, it was entirely
 7 untrue, wasn't it?
 8 A. It was, yes, and it comes back to the original point of
 9 individuals within Celotex trying to dilute that system
 10 message as much as they possibly could.
 11 Q. Just so that everybody understands, it was untrue
 12 because it wasn't suitable unless the building over
 13 18 metres was going to have the same cladding system in
 14 exactly the same build-up as that which had been tested.
 15 A. Yes, correct.
 16 Q. And anybody not reading the small print on page 3, the
 17 disclaimer as you call it, would think that RS5000 was,
 18 as it says, suitable for use on all buildings above
 19 18 metres.
 20 A. Correct, yes.
 21 Q. And again, we can see in the second bullet point down --
 22 I'm sorry to keep asking you these questions -- it says
 23 the by now mantric expression, "therefore is acceptable
 24 for use in buildings above 18 metres". Again,
 25 thoroughly misleading, deliberately put forward, and

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1 dishonest?
 2 A. Yes.
 3 Q. Yes.
 4 I suppose we need to finish this off. If we go to
 5 the next page, please {CEL00007961/2}, we can see that
 6 there are technical data there, with the surface spread
 7 of flame as class 1, and then on the next page
 8 {CEL00007961/3} we can see the certification, and
 9 an identification of the system tested and the
 10 ingredients of that system.
 11 Again, that was misleading because it omitted any
 12 reference to the 6-millimetre magnesium oxide and the
 13 8-millimetre Marley Eternit Natura board over it?
 14 A. Correct, yes.
 15 Q. Therefore, the words, "The fire performance and
 16 classification report issued only relates to the
 17 components detailed above" would itself be thoroughly
 18 misleading, because the components detailed above were
 19 themselves incomplete?
 20 A. Correct, yes.
 21 Q. And that was put forward deliberately and dishonestly by
 22 Celotex?
 23 A. Yes.
 24 Q. And I include you in that.
 25 A. Yes.

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1 Q. Can we finally turn to the press release which we looked
 2 at before, {CEL00009599}.
 3 Now, in the first paragraph it describes RS5000 as
 4 "a new premium performing PIR solution for rainscreen
 5 cladding applications ". That was untrue, wasn't it,
 6 because it wasn't new; it was simply re-branded FR5000?
 7 A. Yes, yeah, and it was only re-branded RS5000 to go
 8 towards new product sales and that target that we spoke
 9 about previously on Thursday.
 10 Q. Yes. And when in the second paragraph it says:
 11 "The latest addition to the high performance, best
 12 in class 5000 series ..."
 13 That suggests that RS5000 was a new product being
 14 added to your range, doesn't it?
 15 A. That's right, yes.
 16 Q. But it wasn't, was it? It was the old FR5000
 17 re-branded?
 18 A. Yes.
 19 Q. So this was a false statement?
 20 A. Correct, yes.
 21 Q. Yes. If you go to the top of page 2 of this document
 22 {CEL00009599/2}, it says -- again, it's the same point:
 23 "With the addition of Celotex RS5000 to an
 24 unrivalled PIR insulation product range ..."
 25 That was again a false statement, wasn't it?

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1 A. Yes.
 2 Q. Because this was not a new product.
 3 A. No.
 4 Q. Then -- and I do now apologise for labouring this
 5 point -- if you go back to the first page
 6 {CEL00009599/1}, please, same point again, second
 7 paragraph, in the third line, after the reference to the
 8 BS 8414 and BR 135 criteria:
 9 "... making it acceptable for use in buildings above
 10 18 metres in height."
 11 Again, that was deliberately and dishonestly
 12 misleading, wasn't it?
 13 A. Yes.
 14 Q. For the reasons we've discussed.
 15 A. Yes.
 16 Q. Now, RS5000 was launched on 5 August 2014, wasn't it?
 17 A. Correct, yes.
 18 Q. At a regional sales meeting.
 19 A. Yes.
 20 Q. At that meeting, I think you gave a presentation, didn't
 21 you?
 22 A. Yes.
 23 Q. And there was a slideshow which accompanied your
 24 presentation, and that's at {CEL00008668}. These are
 25 your slides. Did you speak to them? Did you present

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1 them as you went through them, speak as you went through
 2 them?
 3 A. Yeah, I believe I did, yes.
 4 Q. You did?
 5 A. Yes.
 6 Q. Let's start with the legislative background, please, at
 7 page 4 {CEL00008668/4}, slide 4. We can see that the
 8 presentation addresses the legislative background of the
 9 use of insulation above 18 metres, and there is ADB2,
 10 BS 8414, and BR 135.
 11 Did you explain those pieces of guidance and
 12 legislation, if you like, as part of your presentation?
 13 A. I believe I did, yes.
 14 Q. If you go to page 7 {CEL00008668/7}, or slide 7, there
 15 is a sliding scale of risk categories with
 16 British Standards and Euroclasses.
 17 Do you know where you got that from?
 18 A. No, I don't, to be honest with you, no.
 19 Q. Did you draft this?
 20 A. Yes, I believe I did, yeah.
 21 Q. You see, the reason I'm asking is because in the top
 22 line you have got, "Non-combustible. [British Standard]
 23 476: Part 4 or ... 11", and indeed that's correct,
 24 because those are the tests for combustibility, with
 25 an equivalence of A1 and A2. But then you have in the

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1 next line down, "Low. Class 0", and that would tend to
 2 suggest that class 0 had something to do with
 3 combustibility, whereas in fact it doesn't.
 4 Do you accept that?
 5 A. Yes, I do, but I don't know where I got that table from,
 6 whether that was part of a training presentation that
 7 was given to me, I don't know.
 8 Q. Did you explain to the sales teams present that class 0
 9 was a different concept from combustibility, limited
 10 combustibility?
 11 A. I think that was generally accepted at the time, yes.
 12 Q. Right. That wasn't something in respect of which anyone
 13 within Celotex was in doubt, was it?
 14 A. No.
 15 Q. Right.
 16 If we look at page 16 {CEL00008668/16}, this is
 17 entitled "Annex B (8414-2:2005) - BR 135", and you can
 18 see on the right-hand side there is "B2. Performance
 19 criteria and classification method", and here we can see
 20 what you later come to call your disclaimer:
 21 "The classification applies only to the system as
 22 tested and detailed in the classification report. The
 23 classification report can only cover the details of the
 24 system as tested, it cannot state what is not covered.
 25 When specifying or checking a system it is important to

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1 check that the classification documents cover the
 2 end-use application."
 3 And there is an arrow pointing to it, and it says
 4 "System Classification".
 5 This suggests that this presentation did highlight
 6 to the sales teams the fact that BR 135 only applied to
 7 the system and not individual components.
 8 A. That's right, yes.
 9 Q. But if we then go on to slide 25 {CEL00008668/25}, which
 10 you would have come to not long afterwards during your
 11 presentation, I guess, we can see headline points there,
 12 and these are the key properties of RS5000, and if you
 13 look down there you can see in the penultimate bullet
 14 point:
 15 "Suitable For Use In Buildings Above 18m In Height."
 16 Now, taken as a standalone statement, I think we
 17 have already established that that's misleading because
 18 it wasn't suitable for any building above 18 metres, was
 19 it?
 20 A. Yes. No.
 21 Q. There is a very heavy caveat that would apply to
 22 a statement like that which simply doesn't find its way
 23 into this slide. Why is that?
 24 A. Again, it goes back to that commercial versus technical
 25 argument, I'm afraid. I felt it was important to bring

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1 the sales team up to speed in terms of what the actual
 2 regulations were and the system classification, but
 3 equally, in the back of my mind, I was conscious that
 4 I had two individuals in the room, as a sales director
 5 and a head of marketing, that were equally trying to
 6 push a product in application rather than a system.
 7 Q. Does that tell us that, although your slideshow referred
 8 to the disclaimer, as it were, as small print quite
 9 early on, the bigger message you wanted to get across to
 10 the sales teams was that they should be selling this for
 11 more general application?
 12 A. That was the view of numerous individuals in the
 13 business, including Craig Chambers. I think he wanted
 14 that 18-metre message to be much more prominent than
 15 what they classed as technical jargon to associate
 16 alongside that product launch.
 17 Q. Right. You have referred to Craig Chambers. I was
 18 asking you. I mean, this is your slideshow, and
 19 I appreciate that you're, as it were, operating under
 20 instructions, I understand your evidence about that, but
 21 was it your intention that you wanted, although to have
 22 the disclaimer there in the slideshow, to make that less
 23 prominent, but to make it more prominent to the sales
 24 team that this was a product suitable for use in
 25 buildings above 18 metres in height without the

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1 disclaimer?
 2 A. I don't know what I wanted from the presentation, to be
 3 honest with you. I wanted to get across the message
 4 that it was a system, and I was clear in my head that it
 5 was a system, but I equally had a -- members of the
 6 management group that were in that room that didn't want
 7 that message to be so prominent, so ...
 8 Q. Right, I see. So the reference to BR 135 and the
 9 disclaimer in the early part of the slides was there to
 10 give Celotex plausible deniability in the face of
 11 a clearer message that this was a material, a product,
 12 suitable for use more generally above 18 metres?
 13 A. Yes.
 14 Q. Yes.
 15 Then if we go to the next slide on, 26
 16 {CEL00008668/26}, the message we see in the penultimate
 17 bullet point we have just been looking at is then
 18 compounded by the mantra:
 19 "... Therefore Acceptable For Use In Buildings Above
 20 18m In Height."
 21 So that then reinforced the message about the
 22 general nature of the application of this product,
 23 despite the fact that the test was a narrowly prescribed
 24 one.
 25 A. Correct, yes.

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1 Q. Can we go back a little bit in the slide pack to
 2 slide 18 {CEL00008668/18}, "Latest Addition To Our
 3 '5000' Range", and you can see there there are five
 4 balloons or bubbles:
 5 "Celotex FR5000 - Multi Purpose Solution
 6 "Celotex CG5000 - Cavity Wall Solution
 7 "Celotex GD5000 - Plasterboard Laminate (Dot & Dab)
 8 "Celotex GS5000 - Plasterboard Laminate (Mechanical
 9 Fix)
 10 "Celotex RS5000 - Rainscreen Cladding Solution."
 11 That rather suggests that Celotex RS5000 is a new
 12 product being added to the existing range which included
 13 Celotex FR5000, doesn't it?
 14 A. Yes.
 15 Q. That was untrue, wasn't it?
 16 A. It wasn't a new formulation, but in context of that
 17 slide, the differences between FR5000 and CG5000, the
 18 first two products that were listed there, the only
 19 difference there was board size, one was cut down to
 20 a smaller board size. So that same formulation followed
 21 through one, two -- four of those products were exactly
 22 the same.
 23 Q. My point is slightly different: that Celotex RS5000 was
 24 simply FR5000 re-branded, wasn't it?
 25 A. It was.

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1 Q. And therefore RS5000 wasn't a latest addition to the
 2 5000 range because it was always in the 5000 range in
 3 the guise of FR5000.
 4 A. Yes, but it was marketed that way because of this drive
 5 towards a percentage of turnover coming from new product
 6 development. If it fell within -- if they retained the
 7 FR5000 product name for use in buildings above
 8 18 metres, it wouldn't have contributed to the new
 9 product development turnover, hence it was re-branded
 10 Rainscreen 5000.
 11 Q. I see. So was it a deliberate choice of Celotex to
 12 pretend to have two different products, whereas in fact
 13 it was the same product?
 14 A. Yeah, and that wasn't uncommon across the whole of the
 15 range. There are universal products that in formulation
 16 are exactly the same, but there are differences only
 17 really by the name.
 18 Q. Right.
 19 Did you tell your sales team that in fact RS5000 was
 20 not a new product at all, it was simply FR5000
 21 re-branded so as to be able to get into the
 22 above-18-metre market?
 23 A. No, that was not the message they wanted me to convey.
 24 Q. Why was that?
 25 A. Because with any new product range, they always wanted

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1 it to be perceived as brand new, despite the fact that
 2 the formulation --
 3 Q. Right.
 4 A. -- remained exactly the same.
 5 Q. So you and those from whom you took your orders were
 6 content even to go so far as to mislead your own sales
 7 team in this respect?
 8 A. Yes.
 9 Q. I make the same point again, I think, on slide 46, if we
 10 can go to that, please, page 46 {CEL00008668/46}. We
 11 can see "E-shots", and then a mini slide within it,
 12 "Celotex launch above 18 metre board Celotex RS5000",
 13 and then the first paragraph says:
 14 "Committed to on-going product development, Celotex
 15 has launched Celotex RS5000 specifically designed for
 16 Rainscreen Cladding applications in the latest addition
 17 to the '5000' series."
 18 That was not true, was it, because it hadn't been
 19 specifically designed at all?
 20 A. No, it just -- it had gone through a test at the BRE.
 21 Q. So this statement that Celotex RS5000 had been
 22 specifically designed for rainscreen applications was
 23 intended to mislead not only your sales team, but the
 24 public or the customer with whom any of your sales teams
 25 innocently made this statement?

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1 A. It was intended to, yes, be perceived as a brand new
 2 solution.
 3 Q. By not telling your sales teams, were you protecting
 4 them from a charge of deceit which a customer might make
 5 to them when they did discover that this wasn't in fact
 6 a new product at all?
 7 A. I don't think that was taken into consideration.
 8 Q. Why not simply tell your sales team, "Look, this isn't
 9 actually a new product, it's an old product re-branded"?
 10 A. I think the view was that it would confuse the message.
 11 What was clear at the time when Saint-Gobain took the
 12 business over is that Celotex had numerous products that
 13 were applicable to multiple applications, ie floors,
 14 walls, roofs, the same product, ie FR5000. What they
 15 wanted to focus on was application-specific product
 16 ranges, and RS5000 was the first opportunity to create
 17 a new application-specific product.
 18 Q. Why not just say, "Well, you can now use FR5000 anywhere
 19 on a building, above or below 18 metres"?
 20 A. Because it wouldn't have contributed to the new product
 21 sales.
 22 Q. So in order to contribute to the new product sales, you
 23 had to lie about it?
 24 A. Had to re-brand it.
 25 Q. And then tell your sales team, and through them any

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1 customers, something which wasn't true?
 2 A. From a formulation perspective, yes.
 3 Q. Well, from that statement on the page, "specifically
 4 designed for Rainscreen Cladding applications", that
 5 wasn't true?
 6 A. No.
 7 Q. So do you accept the point I'm putting to you?
 8 A. I do, yes, yeah.
 9 Q. Thank you.
 10 Then if we go to slide 27 {CEL00008668/27}, this is
 11 a diagram of the system, "Celotex & BR 135", and we can
 12 see there the by now familiar ingredients or components
 13 of the system purported to have been tested. No
 14 reference there to the 6 millimetres of magnesium oxide
 15 and no reference there to the 8 millimetres of Marley
 16 Eternit Natura. Again, that slide, for those reasons,
 17 was misleading, wasn't it?
 18 A. It was, yeah.
 19 Q. So, again, you didn't even tell your own sales team
 20 about the true make-up of the rig that was tested
 21 successfully?
 22 A. That's right.
 23 Q. Why didn't you tell them that?
 24 A. Because that was the decision that had been taken in the
 25 business. They not only -- not only didn't they want to

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1 disclose the true test, later on when the product was
 2 launched and there were requests for that test report,
 3 I think the majority of the time the sales team were
 4 refused such information.
 5 Q. Was it your intention that the Celotex sales teams
 6 should not be aware of the fact that the test rig for
 7 the BS 8414 test was not in fact as shown in the
 8 marketing literature or on this slide?
 9 A. It was -- yeah, it was Celotex's intention, of which
 10 I admit I was a part.
 11 Q. What was the reason for not telling your sales teams the
 12 truth in that respect?
 13 A. I don't know. I don't know. I think that's ... that
 14 decision was made above me.
 15 Q. Right.
 16 If we go to slide 32 {CEL00008668/32}, this refers
 17 to three things:
 18 •" Celotex RS5000 Included In BR 135 ... LABC
 19 Approval & Presented To NHBC.
 20 •" Unique Product Code For Project Tracking.
 21 •" Incurred Substantial Development Costs."
 22 In fact, it's right, isn't it, that the only
 23 development costs were those for testing and marketing?
 24 A. Correct, yes.
 25 Q. There weren't any R&D or chemical or analysis product

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1 costs, were there?
 2 A. No.
 3 Q. So to that extent, "Incurred Substantial Development
 4 Costs" is apt to mislead, because it rather suggests
 5 that this is a new product on which money had to be
 6 spent in development?
 7 A. Yes, I guess the cost of the two tests and the marketing
 8 were substantial in relation to previous developments
 9 that had taken place, and that's why that statement was
 10 in there.
 11 Q. Now, we've seen nothing in these slides which even
 12 mentions the first test, which was unsuccessful, in
 13 February 2014. That's right, isn't it?
 14 A. That's correct, yes.
 15 Q. Why was that?
 16 A. Because of the decision to omit any reference to that
 17 first test and subsequently omit any reference to the
 18 magnesium oxide.
 19 Q. So just summarising where we've got to on your launch
 20 day, do you accept -- I think you do -- that you didn't
 21 tell your sales team three things: first of all, that
 22 there had been an earlier BS 8414 test that had failed;
 23 or that the second test had only passed by reason of the
 24 presence of a 6-millimetre magnesium board behind the
 25 Marley Eternit 8-millimetre rainscreen in two places,

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1 which wasn't in the literature or the test report or the
 2 drawing; or even the third thing, which was that RS5000
 3 because simply FR5000 re-branded. That's right, isn't
 4 it?
 5 A. That's right, yes.
 6 Q. And each of those omissions, taken separately or all
 7 together, made your own presentation of RS5000 to your
 8 own sales/marketing teams thoroughly misleading.
 9 A. Correct, yes.
 10 Q. And you knew that.
 11 A. I knew that, yes.
 12 Q. Was your idea that they would then innocently practise
 13 the same deceit on Celotex's intended customers for this
 14 product in order the better to sell it?
 15 A. It certainly wasn't my idea, no.
 16 Q. All right. Was the idea of those from whom you took
 17 your instructions, so far as you could tell, that the
 18 sales teams would then innocently practise this same
 19 deceit in these three respects on Celotex's intended
 20 customers the better to sell this product?
 21 A. I think so, yes.
 22 Q. Right.
 23 Who else in Celotex knew that you were planning to
 24 mislead your sales team?
 25 A. Who else?

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1 Q. Yes.
 2 A. Well, Paul, Rob, Paul Reid obviously knew the details of
 3 the actual test. I can only presume that all of the
 4 members of the management action group, but nobody ever
 5 confirmed that to me.
 6 Q. Did any members of the management action group ever
 7 actually see this slideshow?
 8 A. Yes, I believe there were numerous directors or heads of
 9 a department that were present at that launch.
 10 Q. Who were they, please?
 11 A. Sales director, head of marketing, head of technical.
 12 I don't know whether Craig was present at that launch or
 13 not.
 14 Q. Right. Can you just give me their names? Sales
 15 director, who was that?
 16 A. Paul Reid.
 17 Q. Head of marketing?
 18 A. Paul Evans.
 19 Q. Head of technical?
 20 A. Rob Warren.
 21 Q. So the same people as you told me before, but possibly
 22 Craig Chambers, but you can't recall?
 23 A. I can't recall whether he was.
 24 MR MILLETT: Very well.
 25 I would now like to turn to the subject of your

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1 relationship with NHBC and look at that.
 2 Now, Mr Chairman, I'm not sure I'm going to finish
 3 this tonight, but I don't have that long. It may be
 4 convenient to stop now. I'm conscious that the witness
 5 has had a long day.
 6 SIR MARTIN MOORE-BICK: He has. If we are going to turn to
 7 a new topic, maybe he and others may like respite at
 8 this stage. Because you are going to ask him to come
 9 back tomorrow anyway, aren't you?
 10 MR MILLETT: I am.
 11 SIR MARTIN MOORE-BICK: Can you give me any idea as to how
 12 long you think he might be tomorrow?
 13 MR MILLETT: Yes, I may be able to shorten this overnight a
 14 little bit, but it's unlikely. I would think probably
 15 an hour tomorrow morning, and then a break and then
 16 follow-up questions, which history shows us doesn't take
 17 that long, but one has to allow proper time.
 18 SIR MARTIN MOORE-BICK: That's helpful, because I'm sure
 19 Mr Roper wanted to know quite what time was required
 20 tomorrow. But I think it's better to stop at this
 21 point.
 22 MR MILLETT: Very good.
 23 SIR MARTIN MOORE-BICK: We are going to call a halt for the
 24 day at that point, Mr Roper. As you heard me say to
 25 Mr Millett, I'm afraid we will have to ask you to come

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1 back for a little bit longer tomorrow. I don't suppose
 2 you had that factored into your timetable, but
 3 I'm afraid that's the way it is.
 4 THE WITNESS: Okay.
 5 SIR MARTIN MOORE-BICK: So we will resume at 10 o'clock
 6 tomorrow. Mr Millett's best guess is that he will take
 7 about an hour with you. There will be some follow-up
 8 things after that, so if you're planning your day
 9 tomorrow, you might be wise to not expect to leave here
 10 much before midday. I can't guarantee what the time
 11 will be, but that gives you some idea of where we're
 12 going.
 13 THE WITNESS: That's fine, yes.
 14 SIR MARTIN MOORE-BICK: All right?
 15 THE WITNESS: Yes, okay.
 16 SIR MARTIN MOORE-BICK: All right. Well, if you would like
 17 to go with the usher now, we will see you at 10 o'clock
 18 tomorrow, and again, please don't talk to anyone while
 19 you're away from the hearing room, about your evidence
 20 or anything to do with it, that is.
 21 THE WITNESS: That's fine. Thank you.
 22 SIR MARTIN MOORE-BICK: Thank you very much indeed.
 23 (Pause)
 24 Thank you. 10 o'clock tomorrow, then, please.
 25 (4.30 pm)

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1 (The hearing adjourned until 10 am
2 on Tuesday, 17 November 2020)

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