

OPUS 2

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Grenfell Tower Inquiry

Day 72

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1 Tuesday, 17 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 begin by hearing
5 further evidence from Mr Roper.
6 So would you ask Mr Roper to come back in, please.
7 Thank you.
8 MR JONATHAN ROPER (continued)
9 THE WITNESS: Good morning.
10 SIR MARTIN MOORE-BICK: Good morning, Mr Roper. All right,
11 ready to carry on?
12 THE WITNESS: Yes.
13 SIR MARTIN MOORE-BICK: Good, thank you very much.
14 Yes, Mr Millett.
15 Questions from COUNSEL TO THE INQUIRY (continued)
16 MR MILLETT: Good morning, Mr Chairman. Good morning,
17 Mr Roper.
18 A. Good morning.
19 Q. I want to pick up on one or two things from yesterday,
20 if I can, first of all, before we turn to the question
21 of the NHBC and then the LABC.
22 Going to the rig that was established for the second
23 test in May 2014, it's right, isn't it, that in fact the
24 panels were constructed without any ventilation gaps?
25 A. No, I don't believe that was the case.

1

1 Q. You don't think that's right?
2 Shall we look at [CELO0011015]. That's a photograph
3 of one of the panels, and it looks like the 8-millimetre
4 Marley Eternit Natura panel on the rig.
5 Can you point out there where you say a ventilation
6 gap can be found?
7 A. I believe the differences between the first and the
8 second test, I think there was a decision made to reduce
9 the ventilation, but I believe if you look at the test
10 rig as a whole, you will see ventilation gaps on the
11 rig.
12 Q. Where are they on the rig?
13 A. In between the panels.
14 Q. Well, when you say "look at the rig as a whole", which
15 photograph do you think you're telling us about?
16 A. You know, the main image of the test rig that we saw
17 yesterday.
18 Q. Right. Well, let's see if we can find an image --
19 SIR MARTIN MOORE-BICK: Sorry, while we have that photograph
20 on the screen, the orangey-coloured panel I take it is
21 the 8-millimetre Marley Eternit board; is that right?
22 A. Correct, yes.
23 SIR MARTIN MOORE-BICK: Can we see behind it the magnesium
24 oxide board?
25 A. You can, yes.

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1 SIR MARTIN MOORE-BICK: Right, thank you very much.
2 MR MILLETT: Yes.
3 Let's go to {CELO0001352/33}, please. This is the
4 first draft of the BRE test report, 2 June 2014, and I'd
5 like just to look at figure 17, I think, on page 33.
6 That is the full rig, but perhaps better to go to the
7 previous image, if we can see that {CELO0001352/32}.
8 Again, that's on fire, but can you identify any gaps
9 there?
10 A. Yeah, I think there's a very minimal gap between each
11 panel.
12 Q. Right, minimal gap?
13 A. Yes.
14 Q. Was it a 10-millimetre gap or less?
15 A. No, no, no, it wasn't, it was less than 10 millimetres.
16 Q. Did you instruct Patrick Jones or Patch Jones to
17 construct the panels with very small, under
18 10-millimetre, ventilation gaps?
19 A. Correct, yes.
20 Q. Why is that?
21 A. Because I think we had a discussion there, and I didn't
22 fully understand the ventilation requirements, if I'm
23 completely honest, but I think Patch sort of indicated
24 that you don't necessarily need a 10 or 12-mil gap, and,
25 yes, it sat with the concept of trying to overengineer

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1 the rig.
2 Q. Right, thank you. So you understood, just to be clear
3 about that, that reducing the gap from 10 or
4 12 millimetres was consistent with the intention of
5 Celotex to, as you put it, overengineer the rig so that
6 it passed?
7 A. Yes.
8 Q. Yes.
9 Did you later ask Luke Cresswell at Simco to add
10 10-millimetre gaps to the drawings?
11 A. Yes, I did, yes.
12 Q. Why did you do that?
13 A. It was following the discussion with Paul, the white
14 board photograph.
15 Q. So as to make it look as though there were gaps when
16 in fact there weren't?
17 A. He wanted to alleviate the NHBC's concerns regarding the
18 ventilation gaps. I think they picked up fairly quickly
19 during that presentation that it was overengineered from
20 a ventilation perspective.
21 Q. So was the intention to falsify the drawings to show
22 10-millimetre gaps where in fact there were none?
23 A. Correct.
24 Q. Thank you.
25 Now, we've got still photographs of the test, but we

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1 have no video footage of this test, the second test in
 2 May 2014. Is that correct?
 3 A. I don't believe I've seen any video footage.
 4 Q. No, that's right, nor have we. Do you know why there is
 5 no video of this test?
 6 A. No, I don't, no.
 7 Q. Did you ask Phil Clark not to video the test?
 8 A. No, not at all, no.
 9 Q. Do you know whether a decision was made, a positive
 10 decision was made, not to video the test?
 11 A. No, I thought that -- it was my understanding that all
 12 tests were videoed.
 13 Q. Were you surprised that there was no video of this test?
 14 A. No, not particularly, because I thought that the only
 15 information that would be issued to the manufacturer
 16 would be a test report. Yes.
 17 Q. Right.
 18 Can I turn to a different topic, and that's an email
 19 at {CEL00011926}, please. Now, this is an email from
 20 Nicholas Orf, who we think is from Saint-Gobain. Have
 21 you ever heard of Mr Orf?
 22 A. No, I haven't.
 23 Q. Right.
 24 It looks like an internal email within Saint-Gobain,
 25 as well as copied to Joe Mahoney at Celotex, because

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1 Mr Orf sends it to Maria Fabra-Puchol, copied to
 2 Mr Mahoney, on 30 March, and he says:
 3 "Maria, Joe,
 4 "Here's an update outlining the PIR project so far.
 5 I plan to give this to Frederic when he visits NRDC
 6 Friday. (will also be updating him on the EPS work and
 7 transversal program project)
 8 "Let me know if you have any comments, suggestions
 9 or requests."
 10 I don't want to ask you about that text, I just want
 11 to show you something in the PIR update, which is at
 12 {CEL00011927}. Now, this is a slideshow. Have you ever
 13 seen this document before?
 14 A. No, I haven't.
 15 Q. Right.
 16 Can we go to page 4 {CEL00011927/4} and I'll just
 17 ask you whether you know anything about the topic.
 18 On page 4 you can see that this slide deals with
 19 "Smoke toxicity in Celotex foam", and there is on the
 20 left-hand side an equation or a formula, and on the
 21 right-hand side:
 22 "Celotex PIR gas concentration in waste stream
 23 incineration."
 24 Then the bold summary of that science is this:
 25 "Based on this combustion test, the HCN [hydrogen

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1 cyanide] component of PIR smoke is more toxic than CO
 2 component [carbon monoxide] ..."
 3 And there is an equation there or a formula, and
 4 then possible approaches to reduce hydrogen cyanide.
 5 What did you know yourself about the toxicity of
 6 RS5000, or indeed any Celotex foam?
 7 A. Nothing at all.
 8 Q. Did you yourself give any consideration to the toxicity
 9 of RS5000 if exposed to fire?
 10 A. No.
 11 Q. Did anybody within your team or teams during your time
 12 at Celotex give any consideration to that question?
 13 A. No.
 14 Q. Thank you.
 15 Can I then go to the question of NHBC, and your
 16 relationship, or Celotex's relationship, with it.
 17 Can we go first, please, to {CEL00001020}. This is
 18 an email that you sent to Paul Evans on
 19 5 September 2014, and it relates to ongoing difficulties
 20 with NHBC accepting the test.
 21 Is this a draft email that you were planning to send
 22 more widely?
 23 A. Yes, it is, yeah. I think, from recollection, Celotex
 24 wanted me to produce an email that went out to the sales
 25 team in the absence of what they were seeking, which was

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1 NHBC approval.
 2 Q. Yes, I see.
 3 If we look at the fourth paragraph, it refers there
 4 to competition with Kingspan, and it says:
 5 "I have also been told of a number of occasions now
 6 that Kingspan K15 has successfully tested to
 7 BS 8414-2:2005 onto steel frame (Metsec). This has
 8 apparently only happened recently and has not been
 9 included in their BBA certificate."
 10 Pausing there, can you remember how you came by that
 11 information?
 12 A. It was most likely from the Celotex sales team.
 13 Q. Can you tell us who?
 14 A. Not specifically, no, but --
 15 Q. Right.
 16 A. -- we received emails regularly with updates on
 17 competition.
 18 Q. I see.
 19 It goes on:
 20 "To support any potential challenges we may face
 21 with the NHBC on the way we have tested (i.e thickness
 22 and choice of cladding panel, sheathing board etc.), it
 23 is imperative we understand how K15 that seemingly is
 24 accepted by NHBC has tested to 8414-2:2005."
 25 You have referred there to the thickness and choice

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1 of cladding panel. That's obviously the 12-millimetre
 2 Marley Eternit Natura.
 3 A. Correct, yes.
 4 Q. And that sheathing board is the 12-millimetre magnesium
 5 oxide board behind the Celotex.
 6 A. Yes.
 7 Q. What was the problem with that?
 8 A. With the sheathing board?
 9 Q. Yes.
 10 A. I think there was some confusion around what that board
 11 had to consist of, whether it had to be a calcium
 12 silicate or a magnesium oxide board. I think from
 13 previous research I noted that a lot of contractors were
 14 using cement particle board, which I didn't -- which
 15 I think didn't perform as well as magnesium oxide or
 16 calcium silicate .
 17 Q. Right. I see. Okay. And no reference there to the
 18 problems with NHBC in relation to the 6-millimetre
 19 magnesium oxide board, presumably because there was no
 20 way that they would know about it unless they were
 21 particularly eagle-eyed with figure 18, or 19 as it
 22 became.
 23 A. Correct, yes.
 24 Q. Then you go on to say:
 25 "I am told that the system used a cement particle

1 board rather than a non-combustible sheathing board and
 2 a combustible cladding panel. The details in particular
 3 around what type of panel was used for the exterior of
 4 this system are crucial and would hugely aid our
 5 argumentation."
 6 Were Celotex adopting a strategy of seeking to put
 7 pressure or perhaps persuasion on to the NHBC in
 8 accepting your BR 135 classification by pointing out
 9 that they, NHBC, had accepted Kingspan's?
 10 A. I think that was -- yes, at the initial concept of the
 11 project, you will see from quite a few of my emails to
 12 various organisations, including the NHBC, I was trying
 13 to seek clarity as to how they were approving a rigid
 14 board combustible insulation behind numerous cladding
 15 systems. So, yes, Celotex viewed, as I said previously,
 16 the NHBC as a critical approval, and this news that had
 17 been fed into the business, they were keen to understand
 18 the test details and NHBC's view on it, really .
 19 Q. Yes.
 20 In the next paragraph, you say:
 21 "Having led the way in being transparent of the
 22 tested system that complied with BR 135, we hope that
 23 contractors will challenge our competitors to provide
 24 the same information to have a true understanding of
 25 what has been tested ."

1 Now, there was a similar email that we saw in
 2 July 2014 I asked you about yesterday. But, again, it's
 3 not true, is it, that Celotex was being transparent in
 4 relation to the system which was tested?
 5 A. No, it wasn't. It was a message that was relayed to me.
 6 Q. And the idea behind this was, was it, that you would
 7 stimulate contractors to challenge Kingspan in the same
 8 way that was being discovered now were challenges in
 9 relation to RS5000?
 10 A. Sorry, can you rephrase that?
 11 Q. Yes, I put the question in a slightly unattractive way.
 12 Was your idea that you would stimulate your
 13 contractors into asking the same difficult questions
 14 about K15 that you were finding they were now asking
 15 about RS5000?
 16 A. Yes.
 17 Q. Yes.
 18 Then {CEL00001022}, please. This is an email from
 19 NHBC, if we look at the bottom of page 1, Jon Behan --
 20 I think we have the top of the email -- to
 21 Michael Healey at Celotex, 22 September 2014, and we can
 22 see, just above that, that he forwarded that on to you
 23 on the same day.
 24 If we look at the email string -- let's go down to
 25 page 5 {CEL00001022/5} -- it looks from this string

1 that, you can see at the bottom of the page, in early
 2 September Jon Behan had said to a number of recipients
 3 of this email:
 4 "Following our conversation I can confirm that at
 5 present Celotex is not acceptable at present to NHBC.
 6 Kingspan is acceptable above 18m if Kingspan can provide
 7 project specific confirmation that the product is
 8 acceptable."
 9 Then if you look a little bit up the chain to the
 10 next document, Michael Ryder, who is one of the
 11 addressees, I think, from Drawn Metal/DML Architectural
 12 Systems, responds to him and says:
 13 "Jon,
 14 "Does this include the Celotex RS5000 which has
 15 undergone the necessary test BS8414-2 and can be
 16 therefore used above 18mtrs?"
 17 If we go a little bit further up the chain again
 18 {CEL00001022/4}, Mr Behan tells Mr Ryder that:
 19 "There are issues with the test report issued for
 20 the test carried out. These issues have been relayed to
 21 Celotex but as yet no response has been received by our
 22 technical department."
 23 Then if you look at the top of page 2
 24 {CEL00001022/2}, we only have the bottom of the email,
 25 but Jon Behan -- let's look a little higher up to

1 page 1, I'm so sorry, you're only seeing half the
 2 document. This is Jon Behan to Michael Healey,
 3 22 September, "Michael", and then if you go down to
 4 page 2:
 5 "As stated, NHBC has issues with the test
 6 certification recently achieved. Celotex technical
 7 department are fully aware of the issues raised."
 8 A little bit further down page 2, you can see that
 9 Mr Healey has told him, to which we've seen the
 10 response:
 11 "We currently hold certification for BS8414 part 2,
 12 does the NHBC not recognise part 2?"
 13 I'm sorry, Mr Roper, I've taken those slightly out
 14 of order.
 15 Did you understand when you saw this email string
 16 that, whatever NHBC were beginning to do with Kingspan,
 17 they were concerned -- they would not accept RS5000
 18 above 18 metres for any project?
 19 A. Yes. I think at the time that Celotex RS5000 was
 20 launched was the turning moment for building control to
 21 get a real grasp as to what they'd been signing off
 22 previously.
 23 Q. When you say building control, who do you mean?
 24 A. Generally building control, all building control --
 25 Q. Right. So does that take us up to the BCA,

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1 Building Control Alliance?
 2 A. Yes.
 3 Q. What about the LABC?
 4 A. Yes.
 5 Q. Them as well?
 6 A. Yes.
 7 Q. How does the NHBC fit into that definition of
 8 building control, or does it?
 9 A. Yes. In my view, it forms part of one of those bodies
 10 that reports in to the BCA, unless I'm mistaken.
 11 Q. Yes, I see.
 12 Now, you say that it was at the time of the launch
 13 of RS5000 that this was triggered. Why was that?
 14 A. I don't know, to be honest with you. I really don't
 15 know. I don't know whether the scepticism around the
 16 presentation to the NHBC prompted them to take a look at
 17 combustible insulation in external cladding systems
 18 a little bit more closely, or whether that was a concern
 19 that they had before they even came to the meeting,
 20 I don't know.
 21 Q. Did you get the impression at the time that the entry of
 22 RS5000 as a purportedly new product to compete for the
 23 first time with Kingspan K15 was, as it were, a kick to
 24 a sleeping dog?
 25 A. Yes.

14

1 Q. Can we look at {CEL00001030}, please. This is an email
 2 to you -- it certainly looks like an email, it may not
 3 have been an email. Can you tell us what this is?
 4 A. Yes, it's --
 5 Q. Is it a letter?
 6 A. It's a letter that was emailed across to myself and
 7 Celotex as a business following their visit and the
 8 concerns that they'd raised with the test details.
 9 Q. Yes.
 10 You can see that it's signed, if you look at page 2,
 11 by Dave White, who was a senior technical officer, NHBC
 12 standards and technical. He was the same Dave White who
 13 had come to visit you, I think, in Hadleigh on
 14 19 June 2014.
 15 A. That's right.
 16 Q. If we look at the fourth paragraph on page 1, please,
 17 you can see that he says there:
 18 "When you attended our initial meetings to discuss
 19 the type testing that NHBC normally accepts as proof of
 20 performance ... I took time to explain that any test
 21 specimen would need to represent, as much as practically
 22 possible, the typical construction build-up used for
 23 external facades. In terms of fire resistance these
 24 were wall types built to form the external envelopes of
 25 typical Steel or Concrete framed building with light

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1 gauge steel infill stud walling. I recommended that any
 2 construction submitted for testing should include
 3 substrate build-up and a rainscreen cladding envelope
 4 that would be typically found on multi-storey building
 5 facades."
 6 Had the NHBC explained that to you before the May
 7 test or after the May test?
 8 A. I'm not sure, to be honest with you.
 9 Q. It looks from this -- and tell me if this is wrong --
 10 that when he says he took time to explain, that that was
 11 at the meeting in June 2014, in other words after the
 12 May test; is that right or is that wrong?
 13 A. I don't recall having any conversations with the NHBC
 14 prior to the test that led them to explain what is
 15 explained there in that detail. I think, from
 16 recollection, I emailed Graham Perrior quite often to
 17 see what they were after and how they were approving
 18 Kingspan in use with various cladding systems, but as
 19 we've seen from the previous documentary evidence,
 20 I didn't really get a clear response.
 21 Q. Right.
 22 Can you just go, then, to the top of the next page
 23 {CEL00001030/2}. He says there:
 24 "At our previous meetings [in bold] I took care when
 25 explaining the limitations in testing fire performance

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1 of any wall type where the key details were not
 2 representative of typical actual facade systems - this
 3 included some constructive feedback on your initial
 4 prototype drawings.”
 5 Just pausing there, what meetings is he referring
 6 to, do you think?
 7 A. I'm not sure.
 8 Q. Because we know there was one on 19 June 2014 at
 9 Hadleigh. Were there any other meetings that you had
 10 had with Mr White?
 11 A. I don't believe I had met Dave White until he came to
 12 Hadleigh, unless --
 13 Q. Right. What about Graham Perrior?
 14 A. Yes, I think I met with Graham, I'm sure I did.
 15 Q. On the same occasion?
 16 A. On the same occasion, but maybe I met Graham previously,
 17 I don't know.
 18 Q. Would you have met Graham Perrior before the May test,
 19 do you think?
 20 A. I can't say for sure.
 21 Q. Right.
 22 Is it correct that at previous meetings in the
 23 plural, Mr White took care to explain the limitations in
 24 testing fire performance where the key details were not
 25 representative of typical actual facade systems?

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1 A. He did raise an issue -- and I can't recall whether it
 2 was at the June meeting or, if I met with him
 3 previously, then -- that the build-up needed to be
 4 representative, and I think my challenge to the NHBC
 5 then was: you're approving a product in application that
 6 has been tested with an unrepresentative test.
 7 Q. Yes.
 8 Then he goes on to say in the next paragraph:
 9 "However, in looking more positively at the data
 10 contained in BRE report 295369 I would have the
 11 following comment:
 12 "The information in this report is potentially very
 13 useful to a fire engineer i.e. it can provide the
 14 required input for a suitably fire engineered facade
 15 assessment wherever the building envelope design and
 16 specification may include these particular key wall
 17 elements for high rise elevations."
 18 When you read that, you must have realised that
 19 Dave White was on the wrong track, because of course the
 20 BRE report that he refers to did not include any
 21 reference to the 6-millimetre magnesium oxide or the
 22 8-millimetre Marley Eternit Natura overboards?
 23 A. That's right, yes.
 24 Q. So a fire engineer wouldn't be able actually to make
 25 full, proper use of the BRE report because it didn't

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1 contain those critical details?
 2 A. Correct.
 3 Q. I take it that you never went back to Mr White and told
 4 him that?
 5 A. No, I didn't. I think at the time of the email, I think
 6 that was one of my last involvements with the NHBC and
 7 one of my last few days as product manager with Celotex.
 8 Q. And that's because you moved a few days later into
 9 sales?
 10 A. Correct.
 11 Q. And Debbie Berger took over?
 12 A. Correct.
 13 Q. Yes. Okay.
 14 Now, a few days before this, on 23 September 2014,
 15 I think you had sent a document to Debbie Berger for the
 16 purposes of carrying out a handover meeting with her?
 17 A. Yes.
 18 Q. Can we look at {CEL00001025}, please. This is a Word
 19 document, I think, entitled "Celotex RS5000".
 20 Did you draft this document?
 21 A. I believe I did, yes.
 22 Q. And you give her an overview.
 23 Was this for her eyes only, or intended for her but
 24 not wider circulation?
 25 A. No, I think it was just for the purposes of handing over

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1 the product. I don't think I saw any issue with Debbie
 2 sharing it with anybody else.
 3 Q. Did Paul Evans help you draft this or approve it?
 4 A. Quite possibly, I don't know. I can't say for sure.
 5 Q. You give her an overview in the first paragraph, and in
 6 the last paragraph on that page, under "Testing", you
 7 say in the third line, that's where I think we can pick
 8 it up:
 9 "Marley Eternit & Trespa cladding seemed to
 10 consistently occur as the two most recognised brands
 11 although ACMs were found to be growing in popularity.
 12 Kingspan's K15 BBA highlights how they have approached
 13 testing to BS 8414-1 using a 6mm cement particle board
 14 as the outer face."
 15 SIR MARTIN MOORE-BICK: Sorry, Mr Millett, we don't have
 16 that on our screen. I don't know whether you have it?
 17 A. No.
 18 SIR MARTIN MOORE-BICK: Sorry about that.
 19 MR MILLETT: Sorry, I'm reading from my screen. Right, I'll
 20 start again, third line:
 21 "Marley Eternit & Trespa cladding seemed to
 22 consistently occur as the two most recognised brands
 23 although ACMs were found to be growing in popularity.
 24 Kingspan's K15 BBA highlights how they have approached
 25 testing to BS 8414-1 using a 6mm cement particle board

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1 as the outer face. Using CP boards as the external
 2 cladding panel would prevent fire entering the cavity
 3 and it is no surprise they have achieved a pass with
 4 this construction. Current market intel suggests
 5 Kingspan have tested to BS 8414-2 and it is imperative
 6 we find out how to support RS argumentation and
 7 conversations with Dave White @ NHBC. Discussions are
 8 on-going between Celotex & NHBC with regards to our test
 9 report.”
 10 Did you have a conversation with Debbie Berger about
 11 this subject on the handover?
 12 A. About the NHBC?
 13 Q. Yes.
 14 A. Yes.
 15 Q. Did you tell Debbie Berger that there was, in the test,
 16 6 millimetres of magnesium oxide and 8 millimetres of
 17 Marley Eternit Natura at the level 2 thermocouple and
 18 the top of the rig?
 19 A. I can't say for sure whether I told Debbie, but at the
 20 very minimum I think I would have suggested to Debbie
 21 that she spoke to Paul and Jamie regarding those test
 22 details. I obviously couldn't put it in black and
 23 white, but I think I prompted a conversation between
 24 Debbie and Paul and Jamie.
 25 Q. Nonetheless, the message I think that you're giving her

1 is, first of all, that Kingspan have tested to BS 8414-2
 2 and you needed to find out how that was; and, secondly,
 3 you needed to argue your case with the NHBC -- is this
 4 right? -- that just because they had passed that test,
 5 the NHBC should be accepting Celotex's pass?
 6 A. Correct, yes.
 7 Q. Yes.
 8 If we turn to the top of page 2 {CEL00001025/2} in
 9 this document, you say:
 10 "Depending on the conclusion of NHBC's view, we may
 11 be required to re-test to be accepted for NHBC
 12 projects."
 13 Now, we know that there was no re-test. Are you
 14 able to tell us why there wasn't, in the end, any
 15 re-test of RS5000?
 16 A. Mainly because of costs, I would suggest.
 17 Q. Right. So, so far as you're concerned, was the decision
 18 taken not to incur the costs of the re-test, but to wait
 19 and see how things turned out?
 20 A. Correct, yes.
 21 Q. Can we go to {CEL00003599}, please. This is an email
 22 that you sent to Jamie Hayes and Paul Evans and others,
 23 including Debbie Berger, on 26 March 2015. It's a long
 24 email, I won't read it all to you, but if we can look at
 25 the third paragraph, you say there:

1 "The note below also assumes that LABC and private
 2 building inspectors equally do not have the same
 3 reservations over AD B compliance as NHBC but the recent
 4 publication from the BCA would indicate that it is only
 5 a matter of time before they are brought up to speed
 6 with the issues surrounding combustible insulation. We
 7 could therefore be in a similar position with buildings
 8 that are warranted by somebody other than NHBC."
 9 When you said "it was only a matter of time before
 10 they are brought up to speed with the issues surrounding
 11 combustible insulation", what did you think at that time
 12 NHBC would do?
 13 A. At that time, generally I thought that it seemed
 14 inconceivable that building control were signing off
 15 buildings with combustible insulation based on the test
 16 that Kingspan had carried out, and as I said, I think at
 17 the same time that RS5000 was launched, NHBC were giving
 18 a considerable more ... a bigger focus, I should say,
 19 a bigger focus on combustible insulation and the
 20 approvals that surround that.
 21 Q. Was your view at the time that the NHBC would get
 22 tougher on Kingspan K15 or that they would become
 23 slacker, easier on RS5000?
 24 A. No, I think what was clear from that time was that NHBC
 25 were considering approvals in a lot more detail, and

1 I could only see that going one way, which was that they
 2 would look at Kingspan's original test and start to
 3 question how buildings had been signed off previous to
 4 that.
 5 Q. Right.
 6 Now, after Debbie Berger had taken over from you at
 7 the beginning of October 2014, in fact some time later,
 8 do you remember that the NHBC produced updated guidance?
 9 A. I do, yes.
 10 Q. Do you remember that it was in fact issued in June 2016?
 11 A. Yes. I have seen that.
 12 Q. Can we go to {CEL00001169}. Now, I appreciate that
 13 I think you had left Celotex by the time of this
 14 document, which was July 2016. That's right, isn't it,
 15 I think?
 16 A. Yes, I think so, yeah.
 17 Q. But nonetheless I want to see whether there is anything
 18 in it you can help us with.
 19 If you look at the bottom right-hand corner of the
 20 document on page 1, we need to scroll down to the bottom
 21 of the page, you will see there is a title, "Common wall
 22 and facade types accepted by NHBC", and it says:
 23 "The following common wall and facade constructions
 24 are acceptable to NHBC without the need to provide
 25 an Option 3 assessment providing that the design

1 specification and installation meets the minimum
 2 specifications set in the following appendices.
 3 •" Appendix 1 - Brickwork Facade.
 4 •" Appendix 2 - Timber Panelling.
 5 •" Appendix 3 - Aluminium Composite Panels."
 6 Did you ever see this document, even in a draft form
 7 or an earlier version, while you were at Celotex?
 8 A. Not while I was at Celotex, no. I think I saw this when
 9 it had been issued.
 10 Q. Right.
 11 Do you have any idea why NHBC had gone, in the
 12 course of approximately 18 months or so, from expressing
 13 the concerns that we've seen and you have told us about,
 14 to approving the use of RS5000 in these three types of
 15 build-up, including aluminium composite panels?
 16 A. No, I don't, and at the time when I saw this document,
 17 it surprised me because, as I've just said, I think, if
 18 anything, that they were -- building control generally
 19 were going to become more stringent on the regulations,
 20 on the external wall build-ups of façades, and to see
 21 common wall and façade types accepted by NHBC, with
 22 appendix 3 in particular and aluminium composite panels
 23 next to that, that was a big surprise to me.
 24 Q. Thank you.
 25 Apart from you, were you aware of anybody else at

25

1 Celotex who was in touch with NHBC during the period
 2 from September 2014 until July 2016?
 3 A. I would imagine that remained within product management,
 4 so that would have been Debbie and Paul, I would
 5 imagine.
 6 Q. Right.
 7 I would like to turn next to the topic of the LABC,
 8 and LABC approval for Celotex RS5000.
 9 It's right, I think, isn't it, that LABC approval
 10 and registration was a significant benefit for Celotex's
 11 RS5000 product?
 12 A. They saw it, yeah. Celotex viewed that approval equally
 13 as important, I would suggest.
 14 Q. I think your view at the time was that it accounted for
 15 75% of the market.
 16 A. Yes, but that would have been very much an estimate.
 17 Q. Yes, of course.
 18 Was it you who had responsibility initially for
 19 obtaining LABC approval?
 20 A. Yes, it was one of my tasks, yes.
 21 Q. Now, let's look at {CELO0000716}, this was your long
 22 email of 1 November 2013 to Paul Evans that we looked at
 23 in some detail yesterday. If we look two-thirds of the
 24 way down the page, you will see that there is
 25 a paragraph starting, "An architect will be told", which

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1 I think we read yesterday, and you can see it there on
 2 the screen in front of you.
 3 About halfway down that paragraph, just below
 4 halfway down, you can see you say:
 5 "Kingspan I would suggest ..."
 6 Can you see that?
 7 A. Yes, yeah.
 8 Q. You say:
 9 "Kingspan I would suggest do not have a piece of
 10 paper that states they can specifically be used behind
 11 any cladding panel. What they have done is got BBA
 12 certification stating the fire test method and taken
 13 that to LABC to get a registered document detail which
 14 states that K15 can be used in a variety of cladding
 15 systems and complies with ADB through passing BR 135.
 16 A building control officer is unlikely to challenge
 17 a document that is approved from the head of
 18 building control."
 19 Now, as we've discussed already between us, this
 20 email suggests that your view at the time was that the
 21 market wasn't particularly knowledgeable about the
 22 regulatory requirements for use of insulation above
 23 18 metres?
 24 A. Yeah, there was a great deal of ambiguity about how it
 25 could be that one test had been extrapolated into so

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1 many other different systems.
 2 Q. And that the only person knowledgeable enough to
 3 challenge the compliance of RS5000 on a building above
 4 18 metres was the building control officer?
 5 A. As well as specifiers and contractors and
 6 subcontractors.
 7 Q. As well as specifiers and contractors and
 8 subcontractors; those who happened to have the relevant
 9 skills --
 10 A. Yes.
 11 Q. -- to know what they're talking about?
 12 A. Yes.
 13 Q. And those people, particularly the building control
 14 officer, would know that a BS 8414 test was a system
 15 test which would limit the product's field of
 16 application; is that right?
 17 A. Yes. Yeah, well, as I've said, that's how myself and
 18 a couple of others in Celotex viewed that piece of
 19 Approved Document B.
 20 Q. Yes.
 21 A. It wasn't clear whether the market viewed it in that
 22 way.
 23 Q. No, but your solution, I think -- is this right? -- was
 24 that that dispute or ambiguity could be avoided or at
 25 least minimised by having an LABC certificate saying

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1 that RS5000 could be used in a variety of systems.
 2 A. Yeah, I think it was reviewed at the very outset in
 3 terms of -- I think we saw the slides yesterday, in
 4 terms of options and launch with BBA and LABC and launch
 5 without LABC. What was clear from the LABC registered
 6 detail that was in place for Kingspan K15 was that it
 7 seemed to expand beyond just one system.
 8 Q. Yes, and in going for or proclaiming the benefits of
 9 an LABC certificate, you were essentially following
 10 Kingspan's approach, or wanting to?
 11 A. Correct, yes.
 12 Q. Can we look at {CEL00000735/4}, please. We have looked
 13 at this email chain before. We looked, I think, at the
 14 first and second paragraphs in our discussions yesterday
 15 about the BRE's position. Can I just focus on the last
 16 sentence of this email, where you say:
 17 "I've also got LABC involved to issue a report
 18 stating [Celotex] can be used behind a variety of
 19 systems above 18m to prevent any challenge from
 20 building control."
 21 Now, the date of this email is November 2013. If we
 22 go to the bottom of page 3, we can see that it's
 23 an email you sent to Simco on 8 November 2013.
 24 Is it right that, as early as that, Celotex was
 25 intending to obtain an LABC certificate in order to

1 support its claims that RS5000 was suitable in a variety
 2 of systems?
 3 A. Yeah, it was as early as probably that meeting on
 4 4 November.
 5 Q. And your express reason for doing that was to prevent
 6 any challenge from building control?
 7 A. That's what they wanted to do, yes.
 8 Q. Yes.
 9 Historically, I think you had had some discussions
 10 in late 2013 with the LABC, and also in January 2014.
 11 A. That's right.
 12 Q. Is that right?
 13 A. Yes, it is, yes.
 14 Q. That was ahead of the first test in February 2014?
 15 A. Yes.
 16 Q. If we go to {CEL00000939/3}, please, I would like to go
 17 to the bottom of page 3 in that email run. This is
 18 an email from David Ewing to you of 2 January 2014, the
 19 subject of which was "Celotex Registered Detail
 20 application", and he says:
 21 "Hi Jon
 22 "Trust you had a good Christmas ..."
 23 Then in the third line:
 24 "As we discussed at our last meeting, acceptability
 25 is determined by the associated products specification

1 in combination including cavity barriers. Please just
 2 ask if I can assist with anything else in relation to
 3 your Registered Detail application."
 4 He refers to "our last meeting"; do you remember
 5 when that was?
 6 A. Not specifically, no. I think David may have visited
 7 Celotex's offices once upon a time.
 8 Q. Did you discuss at that meeting, do you remember, about
 9 how LABC would go about determining if a material was
 10 acceptable for use above 18 metres?
 11 A. Yes, yeah, my remit was to understand what LABC
 12 required.
 13 Q. Did you specifically ask him at that stage about the
 14 basis on which Kingspan had obtained an LABC registered
 15 detail?
 16 A. Yes.
 17 Q. What did he tell you?
 18 A. He gave me a list of documents that they'd obviously put
 19 in to LABC back in whenever their registered detail was
 20 formed, and, yes, that was the basis of them issuing
 21 that.
 22 Q. If we look at the bottom of page 3, he says, after his
 23 "Kind regards, David":
 24 "Firstly from the BBA certificate ..."
 25 If we can turn to the top of page 4 {CEL00000939/4},

1 you have an extract there. Do you see that?
 2 A. Yes, I do.
 3 Q. It says at section 7:
 4 "The following fire tests have been undertaken: to
 5 BS 8414-1:2002."
 6 Then you can see what is set out there. Then, as
 7 a final line of that excerpt, I think you can see that
 8 it says, under section 7.2, the product is classified as
 9 class 0 and can be used in accordance with the
 10 provisions of Approved Document B, including
 11 paragraphs 12.5 and 12.6. Do you see that?
 12 A. Yes.
 13 Q. Then he sets out an extract from Kingspan, and then at
 14 the bottom of the page, "from our internal assessment",
 15 and if you go over the page to page 5 {CEL00000939/5},
 16 we can see that he's set out there the extract from
 17 LABC's assessment of K15, and he says:
 18 "K15 has been tested in accordance with:
 19 "BS 8414-1 ...
 20 "BS EN 1364 ...
 21 "BS 476-6 ..."
 22 Do you see that?
 23 A. Yes.
 24 Q. "Fire tests on building materials and structures", and
 25 that's fire propagation. Then BS 476-7, which is

1 surface spread of flame, and then he says:
 2 "From the results, it can be considered as
 3 a material of limited combustibility and meets the
 4 criteria for Class 0 classification for surface spread
 5 of flame."
 6 Now, when you read that, you must have appreciated
 7 that K15 was not a material of limited combustibility,
 8 as Mr Ewing was saying?
 9 A. That's right, yes.
 10 Q. Did it occur to you to ask Mr Ewing of LABC how it was
 11 that he could think that because K15 had passed an 8414
 12 test and the class 0 tests, 476-6 and 476-7, he could
 13 possibly have concluded that K15 was a material of
 14 limited combustibility?
 15 A. I didn't ask him that. I did consult internally on that
 16 matter, and I can recall that conversation, and I can't
 17 remember whether it was with Paul or Rob, and I raised
 18 this as if to say, "Is this right?", because although
 19 I feel like I've got a fairly good understanding of the
 20 differences between class 0 and combustibility, I wanted
 21 to double check that I hadn't misinterpreted the
 22 regulations, and the view was that that's obviously how
 23 the LABC have interpreted it, albeit in Celotex's view
 24 that's incorrect.
 25 Q. Yes. He goes on to say:

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1 "Essentially as the board is described as Class 0,
 2 it can be termed a 'material of limited combustibility'
 3 and so in terms of the relevant part of Doc B it is
 4 suitable for use within the wall construction even at
 5 heights over 18m."
 6 Did that strike you at the time as just plain wrong?
 7 A. Yes, and that's why I went elsewhere.
 8 Q. Were you not troubled by the fact that the LABC thought
 9 that Kingspan K15 was a material of limited
 10 combustibility based on tests which had absolutely
 11 nothing to do with limited combustibility?
 12 A. I suspected at the time that the LABC hadn't even seen
 13 Kingspan's 8414 report.
 14 Q. That may well be the case, but just on what he was
 15 saying and setting out in detail in this email, were you
 16 not concerned that the LABC had confused class 0 with
 17 limited combustibility at a pretty fundamental level?
 18 A. Yes.
 19 Q. Did you go back to Mr Ewing and tell him he had made
 20 a fundamental mistake?
 21 A. No, I didn't.
 22 Q. Why is that?
 23 A. Because I think it was viewed as advantageous not to.
 24 Q. Indeed. And is that because RS5000, whatever else it
 25 did or didn't have, did have a class 0?

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1 A. Yes, it did, yeah.
 2 Q. And therefore you thought -- is this right? -- that you
 3 might be able to get an LABC certificate for use above
 4 18 metres simply based on the fact that it had class 0?
 5 A. Yeah, I think Celotex's view was that they wanted
 6 a registered detail to replicate exactly what K15 had.
 7 Q. And take advantage of LABC's apparent ignorance?
 8 A. It seems that way, yes.
 9 Q. Yes.
 10 If we go up the email chain to the bottom of page 2
 11 {CEL00000939/2} and the top of page 3, we can see that
 12 you respond to him the next day, and you say to him in
 13 the first main paragraph:
 14 "Thanks for coming back to me ... All looks fairly
 15 straight forward and we are confident we can equally
 16 prove to the local research authority that our product
 17 is also classified as Class 0 and once complete, have
 18 tested and passed to BS8414 satisfying AD B. I notice
 19 that the reference point below has been Kingspan's BBA
 20 cert. As discussed previously, we are not going to
 21 pursue this route to begin with but will be able to
 22 prove to the research authority the details and pass
 23 criteria of BS 8414 in the way of documentation from the
 24 BRE themselves. Will this cause any issues do you
 25 think?"

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1 It's clear from that that you had -- is this
 2 right? -- decided not to challenge him on his
 3 misunderstanding and conflation of class 0 with limited
 4 combustibility, but to go along with it and capitalise
 5 on that?
 6 A. I was told not to raise that issue.
 7 Q. Well, it's more than that, isn't it? Actually you were
 8 looking to take advantage of it, in other words to
 9 reinforce his misunderstanding so as to be able to
 10 obtain an LABC registration for RS5000?
 11 A. Yes.
 12 Q. Yes?
 13 A. Yes.
 14 Q. Now, your next email or communication with Mr Ewing
 15 doesn't come until May 2014. If we look at the bottom
 16 of page 1 {CEL00000939/1} in this email string, you to
 17 Mr Ewing, 15 May 2014, first main paragraph:
 18 "Apologies for the LONG DELAY in coming back to you
 19 on progressing with a registered detail for compliance
 20 to AD B. We've had some issues with testing timescales
 21 and the BRE themselves which put the project on hold for
 22 a few months.
 23 "However, I'm pleased to say that we have
 24 successfully passed BR 135 testing and would therefore
 25 like to pick up from where we left [off] and agree on

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1 how we can promptly start work towards a registered
 2 detail.”
 3 It’s right, isn’t it, that in fact the delay was due
 4 to the fact that, in the intervening months, Celotex had
 5 actually undergone a first test in February 2014 which
 6 had failed?
 7 A. Correct, yes.
 8 Q. So the long delay was not attributable to testing
 9 timetables, but actually to the fact that there was
 10 a test which had failed?
 11 A. Yes, and the date of that email there is the day after
 12 I received instruction not to make any reference to
 13 a failed first test or 6-mil magnesium oxide altogether.
 14 Q. I was going to ask you whether this response had come
 15 hard on the heels of the 13 and 14 May MAG meeting, but
 16 you’re telling me that it did?
 17 A. Yes.
 18 Q. And it reflects what you were told?
 19 A. Yes.
 20 Q. Did Paul Evans tell you to write this email in this way,
 21 or just give you the general instruction: don’t refer to
 22 the failed test?
 23 A. Just a general instruction.
 24 Q. And I take it that you never did disclose the failed
 25 test to the LABC?

1 A. No.
 2 Q. At the bottom of the email, you say:
 3 “Is Tim @ West Suffolk still geared up to undertake
 4 the research work?”
 5 Is that Tim Bartlett --
 6 A. I believe so, yes.
 7 Q. -- of West Suffolk building control?
 8 A. Yes.
 9 Q. Did you know him?
 10 A. No, I think that’s who David had mentioned would be
 11 undertaking, I think, the LABC works in the national
 12 office, but they outsource the approvals to the
 13 local authority, I believe.
 14 Q. What did you understand the process of assessment to
 15 involve?
 16 A. Sending across the test, sending across the class 0
 17 reports, sending across the marketing literature,
 18 I believe.
 19 Q. Did you send him the full BRE test report? You didn’t
 20 have it at this stage, but did you later send it to him?
 21 A. I believe they were in receipt of the full test report.
 22 Q. Now, let’s go to {CEL00001995}. This is an email of
 23 17 June 2014 from you to Tim Bartlett at West Suffolk,
 24 copied to David Ewing, subject “Celotex RS5000 Data”,
 25 and is it right that attached to this email was the

1 FR5000 class 0 classification report which was then
 2 re-issued for RS5000?
 3 A. Yeah, because I believe at the time it hadn’t been
 4 re-issued for RS5000.
 5 Q. Now, we don’t see in the attachments the underlying
 6 BS 476 reports. Is that right, that you didn’t send him
 7 the underlying test reports?
 8 A. I don’t know, I can’t say for sure.
 9 Q. Just the classification report?
 10 A. Was there a difference between the two?
 11 Q. Well, there is a test report and a classification
 12 report, and we can’t see the test reports being sent,
 13 only the classification report.
 14 A. Okay.
 15 Q. We can look at the documents if we need to look at them.
 16 A. No, no, no, that’s fine.
 17 Q. Is there a reason why only the classification report but
 18 not the test reports were sent?
 19 A. No, I don’t believe so.
 20 Q. Now, you say there in the fourth paragraph down:
 21 “As discussed, our aim is to provide you with the
 22 support materials to develop a detail which entails the
 23 following:
 24 “- Celotex RS5000 can be used with a variety of
 25 cladding systems (including masonry or rainscreen

1 systems) and can be fixed back to a structural steel
 2 frame with a sheathing board or direct back to masonry.
 3 “- The product as per K15’s RD is suitable for use
 4 in all wind exposures provided the fixing spec meets the
 5 relevant british standards.
 6 “- Celotex RS5000 has successfully tested to
 7 BS 8414-2:2005, meets the criteria set out in BR 135 and
 8 therefore is acceptable for use in buildings with
 9 storeys above 18m in height (subject to the board being
 10 fixed to a non-combustible substrate) alternative
 11 compliance to AD B.
 12 “- The product has Class 0 fire performance.”
 13 Then you go on in the last paragraph:
 14 “We are in the process of getting a revised Class 0
 15 report to state RS5000 rather than FR5000 and will
 16 forward on the draft of the official test report once
 17 received but the holding letter indicates an official
 18 classification is on its way.”
 19 Now, I have read that all to you in full for
 20 a reason, which we’re going to come to.
 21 Is it right that in describing the product in this
 22 way in this email, you were trying to achieve precisely
 23 what Kingspan had achieved with their registered LABC
 24 detail?
 25 A. That’s right.

1 Q. Hence the use in the third bullet point there of the
 2 "and therefore is acceptable for use in buildings with
 3 storeys above 18m in height"?

4 A. Correct, yeah. I believe, from memory, the finalised
 5 registered detail for Celotex RS5000 was near enough
 6 a mirror image of Kingspan K15.

7 Q. And we saw yesterday that that language you had taken
 8 directly from Kingspan's datasheet of March 2011 --

9 A. Yes.

10 Q. -- at {CEL00008510}, yes.
 11 It was of course untrue, wasn't it, that RS5000
 12 could be used with a variety of cladding systems?

13 A. Yes.

14 Q. Again, the same point: you were giving wording to the
 15 LABC that you accepted yesterday was untrue and
 16 misleading, namely that, because the system had passed
 17 an 8414 test, it could therefore be used in buildings
 18 generally over 18 metres?

19 A. Yes, as I said yesterday, that third bullet point there
 20 is exactly the message that Celotex wanted to convey.

21 Q. Yes. But over and above putting that message to be
 22 conveyed in sales literature, you were now wanting the
 23 LABC to put it into its own certificate?

24 A. As they had done for Kingspan.

25 Q. As they had done with Kingspan, but yes is the answer to

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1 my question?

2 A. Yes.

3 Q. So that instead of it simply now being in what might be
 4 dismissed as just sales talk, this was actually now
 5 going to go into an official -looking document which
 6 would have profound influence on the way
 7 building control officers might regard the use of RS5000
 8 above 18 metres; is that right?

9 A. Yes.

10 Q. Now, you obtained LABC approval in August 2014; is that
 11 right? Initial approval, at least.

12 A. I believe so, yes.

13 Q. Let's look at what was issued in that month.
 14 {CEL00000009}, please. This is the LABC registered
 15 details drawing and document list which was issued. It
 16 looks as if it came in to you on 29 August 2014, but
 17 might it have come in earlier than that, do you think?

18 A. I don't know.

19 Q. Look at "Limitations of use", to start with. It says:
 20 "For use in rainscreen wall construction including
 21 above 18 metres height. The required thickness of board
 22 for a particular construction must be established with
 23 the use of the Celotex online calculator."

24 Then it goes on:
 25 "Celotex RS5000 can be used with a variety of

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1 cladding systems (including masonry or rainscreen
 2 systems) and can be fixed back to a structural steel
 3 frame with a sheathing board or direct back to masonry.
 4 "Celotex RS5000 has successfully tested to BS 8414:2
 5 2005, meets the criteria set out in BR 135 and therefore
 6 is acceptable for use in buildings with storeys above
 7 18m in height (subject to the board being fixed to
 8 a non-combustible substrate) alternative compliance to
 9 AD B.

10 "The product has been tested [and] achieves
 11 a 'Class 0' spread of flame."

12 That quote is taken exactly from the wording that
 13 you had suggested in your 17 June email to the LABC,
 14 which we've looked at. In fact, do you accept that it's
 15 a cut and paste?

16 A. Yes.

17 Q. And it even includes the spaces before and after the
 18 bracket, doesn't it?

19 A. I hadn't noted that before, no, but yes.

20 Q. Yes.
 21 Can you account for how it comes about that the LABC
 22 had simply lifted your text from your 17 June email at
 23 {CEL00001995} and put it into a formal document like
 24 this?

25 A. No, because this was the -- I think this was the first

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1 LABC approval that myself or Celotex had been involved
 2 with, so usually the wording comes from the approval
 3 body rather than the manufacturer.

4 Q. Yes. Really what I was asking you was: can you explain
 5 how it came about that the LABC appears simply to have
 6 cut and pasted your message in your 17 June email and
 7 planted it into this registered detail document?

8 A. No, I don't know.

9 Q. When you saw this document at the end of August 2014,
 10 did you notice that that is what they appear to have
 11 done?

12 A. I would have looked at the registered detail and
 13 discussed that, and that's exactly what the business
 14 wanted.

15 Q. Well, that was my next question: is it right that the
 16 LABC certificate was as untrue and as misleading as the
 17 language that you had put into your email of 17 June?

18 A. Yes.

19 Q. And that Celotex had intended that to be the case as
 20 a way of avoiding being challenged by building control
 21 officers down the track?

22 A. I believe so, yes.

23 Q. And at the very least, by failing to ensure that this
 24 document reflected the fact that BR 135 approval is only
 25 for the system tested, Celotex ran the risk of

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1 misleading customers?
 2 A. Yes.
 3 Q. And misleading building control officers?
 4 A. Yes.
 5 Q. And that was intentional, deliberate and dishonest?
 6 A. I believe so, yes.
 7 Q. Did you know that this was the LABC certificate that was
 8 sent by Jonathan Roome to Harley in late August 2014 for
 9 use in the Grenfell Tower project?
 10 A. No, I didn't know that.
 11 Q. Does it surprise you to discover that it was?
 12 A. No, it doesn't.
 13 Q. It's also the same LABC certificate that John Hoban, the
 14 building control officer at Grenfell Tower, says that he
 15 examined, to the best of his recollection.
 16 Again, are you surprised that a building control
 17 officer would look at this document and read it as it
 18 says and be misled by it?
 19 A. I'm not surprised, no.
 20 Q. Now, if we go to {CEL00001017}, this is an email -- and
 21 I'm looking at the second one on the page -- from you to
 22 the sales teams on 9 August 2014 to which you attach the
 23 LABC registered detail certificates for Celotex RS5000.
 24 Do we take it from that that that attachment that
 25 you referred to was the LABC registered detail document

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1 we've just been looking at?
 2 A. Yes, I believe so.
 3 Q. Yes.
 4 Then you say at the bottom of the page:
 5 "These certificates confirm that Celotex RS5000 is
 6 applicable for use in rainscreen cladding applications
 7 below and above 18 metres in height. It confirms that
 8 we have successfully tested to BS 8414-2:2005, meet the
 9 criteria set out in BR 135 and is therefore applicable
 10 for buildings with a storey height greater than
 11 18 metres."
 12 Did you intend that passage to be a misleading sales
 13 message to the sales team to double down, as it were, on
 14 the LABC certificate's contents?
 15 A. It was a message that they had already received from the
 16 launch and was consistent with the message that the
 17 business wanted to convey to not only their own sales
 18 team, but the general market, I would suggest.
 19 Q. Yes. If you go to the top of page 2 {CEL00001017/2},
 20 please, you can see it says:
 21 "LABC are currently in the process of changing the
 22 format of their certificates and these are likely to be
 23 issued to us in the next couple of weeks. In the
 24 meantime, please use the existing certificates.
 25 I recommend using the LABC Drawing & Document List RD491

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1 to issue to customers and specifiers as this contains
 2 more detail around the subject matter but both
 3 certificates can be issued and will be live on LABC's
 4 website within the next two weeks."
 5 So here we see you specifically telling the mailing
 6 lists for the sales teams to send out these registered
 7 details that we've just looked at to potential clients;
 8 that's right, isn't it?
 9 A. Yes.
 10 Q. Notwithstanding that you knew that it was a misleading
 11 document?
 12 A. I knew that, yes.
 13 Q. And again, that was deliberate and dishonest on your
 14 part?
 15 A. It was, yes.
 16 Q. Did Paul Evans know about that?
 17 A. Yes.
 18 Q. How did he know about that?
 19 A. Because he was copied in to that email, and I think
 20 earlier up the chain there's a response from him on
 21 that.
 22 Q. Indeed, and if we go to the top of that chain, page 1
 23 {CEL00001017/1}, Paul Evans' response to you was:
 24 "Outstanding. Well done.
 25 "Now just the NHBC please!"

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1 What did you understand him to mean by "Now just the
 2 NHBC please"?
 3 A. So this was during my time as product manager. He was
 4 still pushing me for NHBC approval, if such a thing
 5 existed.
 6 Q. To your understanding, did you understand Paul Evans to
 7 be asking you to take the same approach with the NHBC
 8 that we've just seen that you took with the LABC?
 9 A. Yes.
 10 MR MILLETT: Mr Roper, thank you very much.
 11 I have no further questions of my own to ask you,
 12 but there may be some further questions which, on
 13 looking back at my notes, I may have or may come from
 14 others.
 15 So, Mr Chairman, is that a convenient moment for the
 16 break?
 17 SIR MARTIN MOORE-BICK: Well, I think it probably is, isn't
 18 it?
 19 MR MILLETT: Yes.
 20 SIR MARTIN MOORE-BICK: Just so you understand, Mr Roper,
 21 when counsel has reached the end of the questions he
 22 thinks he needs to ask, he needs a little bit of time
 23 just to check nothing is missing, but we also have to
 24 allow the possibility that others who are not physically
 25 present may want him to put questions to you. So we

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1 have a break, which we will combine with our morning
 2 break, at this point.
 3 So we will come back at 11.25, please, and we will
 4 see if there are any further questions for you then.
 5 THE WITNESS: Okay.
 6 SIR MARTIN MOORE-BICK: In the meantime, if you go with the
 7 usher, and of course not talk to anyone about your
 8 evidence or anything relating to it.
 9 THE WITNESS: That's fine.
 10 SIR MARTIN MOORE-BICK: Thank you very much.
 11 (Pause)
 12 Thank you very much. 11.25, then, please.
 13 Thank you.
 14 (11.08 am)
 15 (A short break)
 16 (11.30 am)
 17 SIR MARTIN MOORE-BICK: Mr Roper, we will see if there are
 18 any more questions for you.
 19 Mr Millett, how are we?
 20 MR MILLETT: Mr Chairman, there are a few, not very many.
 21 The first is really an observation I should make.
 22 I asked you some questions this morning about a BRE
 23 video on the premise that there wasn't one. In fact,
 24 I'm told there was a BRE video. It was disclosed to
 25 the Inquiry very late on, so there was one.

1 Does that fact alter any of the evidence that you
 2 have given this morning?
 3 A. No. I think I've seen a BRE video, but I thought it was
 4 of the first test, but maybe there was one of the second
 5 test, so I apologise for that.
 6 Q. Right. But you never saw it yourself?
 7 A. I can't recall.
 8 Q. Do you know whether anybody else within Celotex saw the
 9 video?
 10 A. It must have been stored somewhere, but I don't know who
 11 would have viewed that.
 12 Q. Next I've got some questions from the LABC, which is
 13 this: do you recall that the certificate we looked at
 14 before, the one that came in August, was then replaced
 15 later on in 2014?
 16 A. No.
 17 Q. You don't remember that?
 18 A. No.
 19 Q. Let's have a look at {CELO0002021/2}, please. This is
 20 an email from Sam Li to you, 3 November 2014, and Sam Li
 21 says to you that there are "several important changes
 22 made to your registration with us", and under
 23 "New Certificates", he says:
 24 "A new registration certificate has been created for
 25 your system/solution, providing your clients with more

1 detailed information about your product and the scope of
 2 your consideration. A copy of this certificate is
 3 attached to this email."
 4 So new ones came in then.
 5 Do you remember receiving new changed LABC
 6 certificates ?
 7 A. No, I don't.
 8 Q. Let's have a look at {LABC0001776}, please, and see if
 9 that triggers a recollection .
 10 That's the same document as I've just been looking
 11 at. If you look at -- we can stay with this -- the
 12 bottom of page 1, if you go back to look at the bottom
 13 of page 1 of the email run itself -- perhaps we should
 14 go back to {CELO0002021}, please, bottom of page 1 of
 15 that. You can see that you send an email to
 16 Debbie Berger, 3 November 2014:
 17 "Debs,
 18 "For you.
 19 "Please go back to LABC and ask to take out any
 20 references that RS5000 is the same product as FR5000."
 21 Again, was that because you wanted to mislead or
 22 Celotex wanted to mislead people into thinking that
 23 RS5000 was a new product?
 24 A. No, I think it was because they clearly wanted to
 25 distinguish between the two.

1 Q. You can see that at the top of the page, she goes back
 2 to Sam Li and suggests some paragraphs of text to
 3 replace "Description of product". Secondly:
 4 "To replace first paragraph starting with Celotex
 5 has provided test reports ... within 'scope of
 6 registration '"
 7 And then:
 8 "... third paragraph starting with The product has
 9 Class 0 ... within 'scope of registration '"
 10 Then if we go to {CELO0008691/2}, please, this is
 11 an email run -- if we look at the bottom of page 1, here
 12 is an email from Debbie Berger to Sam Li, copied to you.
 13 Over the page to page 2, please, we can see that she
 14 says:
 15 "Hi Sam
 16 "I've just noticed the website is live with the
 17 certificate and fact sheet.
 18 "Is ... it possible to limit visibility or better
 19 remove these until we have sorted out the wording?"
 20 On the page above that, if we go back to page 1
 21 {CELO0008691/1}, we can see the LABC response which
 22 comes from Sam Li:
 23 "Hi Debbie,
 24 "Sorry for the delay in getting round to your
 25 emails. No problem at all. I will check with my

1 colleague who deals with the website if we can make your
 2 landing page not visible to members of the public.
 3 "I will check with my Manager to see if we can make
 4 the suggested changes in your attachment on the
 5 certificates and website."
 6 Now, we can see you were copied in to this entire
 7 email run. Do you remember that although new form
 8 certificates had been issued, they weren't actually
 9 generally available until the wording was sorted out?
 10 Do you remember that?
 11 A. No, I mean, this is jogging my memory, but at the time
 12 I'd moved out of product management at that time and
 13 into area sales, so I may have quickly glanced at it,
 14 but ...
 15 Q. Right. Do you remember when -- maybe you don't -- the
 16 wording was sorted out and the final version of the LABC
 17 certificate became live on their website?
 18 A. No, I don't.
 19 Q. Does the date July 2015 or September 2015 ring any bell
 20 with you?
 21 A. No.
 22 Q. No, it doesn't, right.
 23 Can I then turn to another question.
 24 Now, you said in your evidence this morning at
 25 page 36 of the transcript, lines 1 to 6 {Day72/36:1-6},

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1 that you were told not to challenge Mr Ewing of the
 2 LABC's conflation of class 0 on the one hand with the
 3 concept of limited combustibility on the other.
 4 Who told you not to challenge LABC on that point?
 5 A. I can't recall specifically, but I know that that
 6 discussion around class 0 and the perceived
 7 misunderstanding of class 0 and limited combustibility
 8 would have taken place with either Rob or Paul.
 9 Q. Either Rob or Paul, so that would be Rob Warren or
 10 Paul Evans; yes?
 11 A. Yes.
 12 MR MILLETT: Yes, okay, thank you.
 13 Yes, I think that's all I need to ask you.
 14 Thank you very much, Mr Roper, I've got no further
 15 questions for you I need to cover.
 16 Mr Chairman, I have no further questions.
 17 It only remains for me to thank you very much for
 18 coming to help us with our investigations, we are
 19 extremely grateful to you and for your evidence. So,
 20 Mr Roper, thank you.
 21 THE WITNESS: Thank you.
 22 SIR MARTIN MOORE-BICK: Mr Roper, it just remains for me to
 23 thank you on behalf of the panel for coming to give
 24 evidence. I know it took rather longer than you
 25 expected. I'm sorry about that, but there were a lot of

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1 questions we had to ask you.
 2 Your evidence has been very helpful, and we're very
 3 grateful to you for it and for the candour with which
 4 you have given it. Thank you very much.
 5 You are now free to go, so if you would like to go
 6 with the usher, she'll look after you.
 7 THE WITNESS: Thank you.
 8 SIR MARTIN MOORE-BICK: Thank you.
 9 (The witness withdrew)
 10 SIR MARTIN MOORE-BICK: Now, then, Mr Millett, we have
 11 another witness, but I think we have to have a little
 12 break for housekeeping purposes, don't we?
 13 MR MILLETT: We do.
 14 SIR MARTIN MOORE-BICK: So we'll rise for -- well, as short
 15 a time as it takes to do what has to be done.
 16 MR MILLETT: Yes, it's probably about ten minutes, if
 17 that's ...
 18 SIR MARTIN MOORE-BICK: Well, you send someone to come and
 19 get us when you're ready.
 20 MR MILLETT: Will do, thank you very much.
 21 (11.40 am)
 22 (A short break)
 23 (11.50 am)
 24 SIR MARTIN MOORE-BICK: Now, Mr Millett, who is your next
 25 witness?

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1 MR MILLETT: Mr Chairman, I call Mr Paul Evans, please.
 2 SIR MARTIN MOORE-BICK: Thank you very much.
 3 MR PAUL EVANS (affirmed)
 4 SIR MARTIN MOORE-BICK: Thank you very much, Mr Evans. Good
 5 morning. Do sit down and make yourself comfortable.
 6 THE WITNESS: Thank you.
 7 SIR MARTIN MOORE-BICK: Yes, Mr Millett.
 8 MR MILLETT: Mr Chairman, thank you.
 9 Questions from COUNSEL TO THE INQUIRY
 10 MR MILLETT: Mr Evans, good morning.
 11 A. Good morning.
 12 Q. Can I begin by thanking you very much for attending to
 13 give evidence today.
 14 If you have difficulty understanding my questions or
 15 you want me to put the question in a different way,
 16 I can do that.
 17 We will take scheduled breaks, although I don't
 18 think we will take a break before lunchtime today.
 19 A. Okay.
 20 Q. But we will take scheduled breaks in the afternoons and
 21 in the mornings. If you feel you need a break at any
 22 other point, please just let me know.
 23 A. Okay.
 24 Q. Could you also please try to keep your voice up so that
 25 the person who sits to your right can get down

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1 everything you say onto the transcript.
 2 A. I will.
 3 Q. Also, if you nod or shake your head, that doesn't come
 4 out on the transcript, so say "yes" or "no" as the case
 5 may be if that's the answer.
 6 A. Okay.
 7 Q. You have made two statements for the Inquiry. Can
 8 I please take you to them. You will have them in the
 9 folder on the desk in front of you but also on the
 10 screen in front of you, and every document I'm going to
 11 show you will appear on that screen as well.
 12 A. Okay.
 13 Q. The first statement is at {CEL00010058}, and that is
 14 your first statement. Can you confirm that, please?
 15 A. Yes, that's correct.
 16 Q. If you go to page 70, there is a signature above the
 17 date of 31 October 2018. Do you see that?
 18 A. Yes.
 19 Q. Is that your signature?
 20 A. It is.
 21 Q. Have you read this witness statement recently?
 22 A. I have.
 23 Q. Can you confirm that its contents are true?
 24 A. Yes.
 25 Q. The second witness statement is at {CEL00012233}, if we

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1 can have that, please. Is that the first page of your
 2 second witness statement?
 3 A. It is.
 4 Q. If you go to page 8, please, you can see a signature and
 5 a date, 15 June 2020, with the signature above that. Is
 6 that your signature?
 7 A. It is.
 8 Q. Again, have you had a chance to read that statement?
 9 A. I have, yes.
 10 Q. Can you confirm again that its contents are true?
 11 A. Yes.
 12 Q. Have you discussed your evidence you are going to give
 13 today with anybody before coming here?
 14 A. No.
 15 Q. I want to ask you some questions first, please, about
 16 your background.
 17 You joined Celotex in 2007.
 18 A. Yes.
 19 Q. And you became a product manager there, didn't you?
 20 A. Yes.
 21 Q. Was this your first job in the construction industry?
 22 A. It was, yes.
 23 Q. You graduated with a degree in business management and
 24 marketing, didn't you?
 25 A. Yes.

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1 Q. So when you came to Celotex, is it right that you had no
 2 technical knowledge or experience of any kind?
 3 A. I didn't, no.
 4 Q. If we go to your witness statement, your first
 5 statement, paragraph 10 on page 3 {CEL00010058/3},
 6 please, if we can, you say at the very end of that
 7 paragraph on that page, and over to page 4:
 8 "Naturally to be able to market products I had of
 9 necessity to gain some technical knowledge but the
 10 gaining of such knowledge was a gradual process over
 11 time which was not supported by any formal training
 12 programme, peer to peer review or appraisal by
 13 a Statutory Director."
 14 So clearly there was no formal training in place;
 15 was there any informal training in place?
 16 A. When I joined I would have had an induction programme
 17 set out for me, which would have encountered some time
 18 with the Celotex technical centre, so I would have been
 19 given an overview of the products and the applications
 20 in which they were used.
 21 Q. Was there any technical or scientific explanation of the
 22 products, how they performed under windloading, fire
 23 performance, matters of that nature?
 24 A. I can't recall the exact detail.
 25 Q. Was there no real oversight of your knowledge as you

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1 acquired it, in other words no regular training sessions
 2 or programmes?
 3 A. No, training -- as I gained more time in the business,
 4 I learnt as I spent more time.
 5 Q. Right, so really learning on the job?
 6 A. Yes.
 7 Q. Right. Can we go to page 12 of your statement
 8 {CEL00010058/12}, please, paragraph 44. You say there,
 9 under the title "Development and testing of RS5000", in
 10 your last sentence:
 11 "The scope of these [and that's marketing slides]
 12 also extended to market programmes including new
 13 building regulations as well as brand evolution
 14 initiatives especially digital strategies, a new website
 15 and a new customer relationship management system."
 16 Does that mean, when you refer to "new building
 17 regulations", that you gave presentations about the
 18 Building Regulations?
 19 A. I didn't give presentations on Building Regulations.
 20 What I'm saying there is that part of the marketing
 21 activity would be when new Building Regulations were
 22 introduced, primarily part L, that would have formed
 23 part of the workload of the marketing department.
 24 Q. I see. So you would market based on the evolution of
 25 the Building Regulations as they happened?

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1 A. There had been -- when the regulations changed in 2010,
2 there was work done around promoting Celotex's role
3 within Building Regulations for part L.
4 Q. Right. But to do that marketing function, do we take it
5 that there was no formal or even informal education
6 given to you or anybody under you involved in marketing
7 as to what the new regulations meant or how they worked?
8 A. No, no formal training, no.
9 Q. Again, was that just looking at the regulations as they
10 came in, working out what they meant for yourself, and
11 adapting your marketing strategies around that?
12 A. Yes, alongside the team as well.
13 Q. Can we look at {CEL00010154/7} at the bottom, please.
14 This is the witness statement of Jamie Hayes of Celotex.
15 At paragraph 22, he says in the third line:
16 "PE [that's you, Paul Evans] was young when he
17 joined Celotex and worked under CK."
18 That's Chris King?
19 A. Yes.
20 Q. "CK had a certain way of working, that I would describe
21 as aggressive and he had a reputation for taking
22 shortcuts. PE had no construction experience and as far
23 as I was aware, he picked up everything he knew from CK.
24 Effectively, he was promoted to Marketing Director
25 without a lot of experience and in practice was able to

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1 make decisions within Celotex without any real checks or
2 balances."
3 Is it right to say that you picked up everything you
4 knew from Chris King?
5 A. The majority of my day-to-day training and learning
6 about marketing and product management would have come
7 through Chris, who was my line manager at the time, yes.
8 Q. Line manager; was he also your mentor and role model?
9 A. I wouldn't say role model.
10 Q. Mentor, then?
11 A. Yeah, I spent a lot of time with Chris learning about
12 the job.
13 Q. Would you agree with Jamie Hayes' characterisation of
14 Chris King's way of working that we see in that
15 paragraph?
16 A. I would say Chris had a style. I wouldn't describe that
17 style as aggressive.
18 Q. How would you describe it?
19 A. He was firm. He was -- he knew -- he had high
20 expectations of people.
21 Q. Did his way of working influence your own style of
22 working?
23 A. I don't think so. Myself and Chris are two totally
24 different people, so I wouldn't say that my style would
25 have reflected Chris' style.

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1 Q. You became head of marketing, I think, in and from
2 May 2013; is that right?
3 A. Yes.
4 Q. At that time, did you become a member of the management
5 action group, or MAG?
6 A. I did.
7 Q. Was that the senior management team?
8 A. It was.
9 Q. Was it the board of Celotex, or was there a difference
10 between MAG and the board?
11 A. When I joined the MAG, the company had been acquired by
12 Saint-Gobain, so I believe the reporting structure and
13 different hierarchical structure would have been
14 different, and I don't really understand -- or
15 understood that. Prior to me being promoted to head of
16 marketing, the MAG was the board to all intents and
17 purposes.
18 Q. I see.
19 Was there anybody on the MAG board at the time you
20 joined it that was also on the main board of Celotex?
21 A. There was members of the MAG when I joined it that had
22 been members of the MAG prior to the business being
23 acquired by Saint-Gobain, yes.
24 Q. Well, that's not quite an answer to my question.
25 When you joined the MAG, were there any members of

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1 MAG who were also members of Celotex's main board?
2 A. I don't know.
3 Q. Nonetheless, is it right that the MAG was the senior
4 day-to-day decision-taking body within Celotex?
5 A. Yes.
6 Q. And it met monthly, I think, didn't it?
7 A. It did.
8 Q. You became marketing director in October 2015; is that
9 right?
10 A. Yes.
11 Q. Was that effectively the same role, in the sense of the
12 same responsibilities, as you had had before?
13 A. Absolutely.
14 Q. Was there ever a time after you joined MAG when you
15 ceased to be a member of MAG but before you left
16 Celotex?
17 A. No, I was on the MAG until I left Celotex.
18 Q. Right.
19 If we look at your statement, please, at page 5
20 {CEL00010058/5}, paragraph 15, in the third sentence
21 there -- this is in relation to your early employment
22 with Celotex -- you say:
23 "It became apparent to me that I was working for
24 a business which was looking to be sold [this is in
25 2012, I think] not least because I and other employees

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1 were told on a variety of occasions by senior management
 2 that the business would one day be sold. Budgets, and
 3 the business generally, were incredibly lean.”
 4 Now, prior to the sale to Saint-Gobain, is it right
 5 that Celotex was owned, or at least majority owned, by
 6 AAC Capital Partners?
 7 A. That name, that company name, is familiar. I don't know
 8 whether it was a majority shareholding.
 9 Q. Did they have an influential stake?
 10 A. I believe so.
 11 Q. Is it right -- and tell me if this is wrong -- that they
 12 were the private equity arm of originally part of
 13 ABN AMRO, a Dutch bank?
 14 A. I don't know.
 15 Q. Did you understand that their investment strategy, or
 16 the shareholders overall's investment strategy, was
 17 a sale?
 18 A. Yes.
 19 Q. Hence the drive for profits and increased earnings per
 20 share, and therefore a better exit price?
 21 A. The business was set up for, yes, an exit strategy, and
 22 I believe the business was run with that as the ultimate
 23 goal.
 24 Q. And with an exit strategy as the ultimate goal, did you
 25 understand that that meant a drive for revenues with

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1 a view to boosting the earnings per share or its
 2 enterprise value?
 3 A. Not so -- don't know so much about shares, but certainly
 4 in terms of maximising revenue, yes.
 5 Q. Right.
 6 In your witness statement at paragraph 3
 7 {CEL00010058/1} -- and I don't think you need to go to
 8 it -- you refer to the transfer to Saint-Gobain on
 9 31 December 2015. Was that when the sale was finalised
 10 formally?
 11 A. Sorry, can you say that again, please?
 12 Q. Let's look at it, page 1 of your witness statement,
 13 paragraph 3. You say in the middle of the paragraph:
 14 "The manufacturing business that produced Celotex
 15 insulation was transferred from Celotex Limited to
 16 Saint-Gobain Construction Products UK Limited ... with
 17 effect from 31 December 2015 ..."
 18 A. Yes.
 19 Q. Was that when the sale was finalised, or was the sale to
 20 Saint-Gobain finalised before that?
 21 A. The sale to Saint-Gobain was finalised before that.
 22 Q. Right, I see.
 23 Is this right: even though Celotex had been sold to
 24 Saint-Gobain by its previous owners, the manufacturing
 25 business that produced Celotex was still run by and

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1 owned by Celotex until December 2015?
 2 A. Yes.
 3 Q. Yes, I see.
 4 A. As part of what they called a hive-up exercise.
 5 Q. Yes, I follow.
 6 Now, can we go back to Jamie Hayes' statement,
 7 please, {CEL00010154/6}, and I would like to show you
 8 paragraph 17. Mr Hayes says:
 9 "Even before this acquisition [and this is the
 10 Saint-Gobain acquisition in and from 2012] Celotex was
 11 largely marketing led given that those individuals at
 12 the top of the business had mainly originated from the
 13 Marketing Department. Celotex used to be owned by
 14 private equity group AAC Capital Partners and so the
 15 drive for profit making and increasing the company's
 16 share price had been systemic in the Celotex culture for
 17 some time."
 18 Pausing there, do you agree with that from your own
 19 observations while you were at Celotex?
 20 A. There was -- yes, the culture for Celotex was around, as
 21 I said, you know, the drive for revenue and the plan for
 22 exit.
 23 Q. Yes.
 24 He says:
 25 "However, it seemed as though this culture became

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1 heightened once Saint Gobain became involved."
 2 Do you agree with that?
 3 A. Yes.
 4 Q. "I knew from later conversations between PE,
 5 Craig Chambers ('CC') and Jon Roper ('JR') (whose roles
 6 are explained below) at which I was present that
 7 Saint Gobain had asked for a budget for increasing
 8 profits and that at least 15% of this increase would
 9 need to be attributed to new products. I remember
 10 thinking we were not allowed to simply sell more of our
 11 existing products to increase profits. For me this
 12 meant that there was a drive for innovation and a sense
 13 of pressure to increase profits at Celotex."
 14 Did you pick up the fact that Saint-Gobain had asked
 15 for a budget for increasing profits, and that at least
 16 15% of that increase would need to be attributed to new
 17 products?
 18 A. There was an internal target in the company which was
 19 around 15% when it was first set, that 15% of the sales
 20 had to come from a specific set of products, the
 21 5000 range. The Saint-Gobain target, as I recall, was
 22 that as a global entity they would like 20% of sales to
 23 come from products that had been launched within the
 24 last five years.
 25 Q. Right. And looking at those last two sentences in

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1 Mr Hayes' paragraph 15 there, do you agree with what he
 2 says in those sentences?
 3 A. There was definitely a drive to increase innovation and
 4 have new products on the market, yes.
 5 Q. Right.
 6 Now, I want to ask you some questions about lambda.
 7 Can we go to {CELO0010498}, please. This is an email of
 8 22 July 2009 from Ian Parker to you and also to
 9 Rob Warren, and it's clear from that that, at that time,
 10 the lambda value that Celotex was aiming to maintain was
 11 22 or 0.022. Do you remember that?
 12 A. I'm just trying to understand what product range this
 13 was for, sorry, just from the date.
 14 Q. From the dates, yes, and you can see that it's --
 15 perhaps this helps: the subject is, "Hipchen Lambda 22
 16 rolling results", so it's whatever comes off the Hipchen
 17 product line.
 18 A. Yes, and multiple products came off of the Hipchen line,
 19 so ...
 20 Q. Yes. What Mr Parker, who is the quality manager, says
 21 is that there is a data set:
 22 "The BBA result has been put into the data set ...
 23 "The effect is that if we use this number with only
 24 the LOWEST result per day we would be outside declared
 25 value at 22.11 due to the increase in standard

1 deviation and the small sample size (this would improve
 2 over time as the numbers of tests increase.
 3 "If we put the number into the data set which
 4 contains all the data between 19.4 and 20.4 results we
 5 are within declared result at 21.96."
 6 Then he says:
 7 "The obvious problem is that the BBA result is a lot
 8 higher than our figures since we filter out the high
 9 results, will this be picked up by the BBA since we have
 10 verified our equipment to theirs and the number does
 11 look out of place."
 12 Did you think it was acceptable practice to filter
 13 out the high results?
 14 A. No, I don't think it was acceptable. I think this has
 15 come from a programme of testing which has been put into
 16 place by the business, and I believe I'm included in
 17 this email because I had a responsibility to be the
 18 go-between in getting BBA certification.
 19 Q. Right. So you accept that it wasn't acceptable
 20 practice?
 21 A. It wasn't acceptable, no.
 22 Q. No, thank you.
 23 Going on, he says:
 24 "Out of interest our true declared lambda for July
 25 (all data unfiltered) is 22.76, against our 'selected'

1 21.96."
 2 So you could see from that that there was a method
 3 or means by which you could select 21.96 and be within
 4 22, whereas if you looked at all the figures and gave
 5 the true declared lambda, that would take you above 22;
 6 is that essentially what he is saying?
 7 A. That is what he is saying. There was, as I say,
 8 a process for testing which was put into the business
 9 which used a selective data process.
 10 Q. You say that it was a process for testing put into the
 11 business; did you have any role in putting that process
 12 into the business?
 13 A. No, that --
 14 Q. Do you know who did?
 15 A. The only recollection I have is that this was discussed
 16 at a -- I believe what would have been called the PLCP
 17 meeting.
 18 Q. Yes.
 19 A. I know that lambda was discussed there and I know I used
 20 to go to that meeting, but so did all of the -- the
 21 majority of the directors of the board.
 22 Q. Are you telling us that this methodology for data
 23 selection was already in place at the time you joined
 24 Celotex, so far as you recall?
 25 A. I don't know.

1 Q. You don't know. All right.
 2 Let's go to {CELO0010272}, please. This is
 3 a technical report from Ian Parker, who is the person
 4 who sent that email, of 9 December 2012, and it's
 5 circulated to RP, JA, CK, PE, JM and RW. I take it that
 6 PE is you?
 7 A. Yes.
 8 Q. And that CK is Chris King?
 9 A. Yes.
 10 Q. And RW is Rob Warren?
 11 A. Yes.
 12 Q. Do you know RP, JA and JM are?
 13 A. JM would be Joe Mahoney.
 14 Q. Right.
 15 A. RP would be Richard Pemberton, and JA would be
 16 John Arnold.
 17 Q. In the first paragraph it says:
 18 "Following the decision to pursue lambda 22 on the
 19 Hipchen the following is a summary of the current and
 20 proposed process for the collection of thermal sample
 21 result against which external auditors will Audit."
 22 Then he sets out the current process. If you look
 23 at item 4:
 24 "Any thermal falling outside the selection bands of
 25 19.4 to 20.4 (to give a declared lambda 22) have a check

1 box unticked so the result is not displayed on a
 2 separate record sheet with the same database. i.e An
 3 auditor will only see the thermals in the selection
 4 band.”
 5 So that was the current process. So it looks from
 6 that -- is this right? -- that the process as set up
 7 meant that a number of statistics would fall outside
 8 what an auditor would see, so that the auditor would, on
 9 the statistics that they saw, get to a declared value of
 10 22?
 11 A. That appears to be the process that the quality team
 12 were undertaking, yes.
 13 Q. Right. He goes on:
 14 "Issue with process which could be identified by
 15 an auditor if they followed the process train.
 16 "a) The 'selected' data is contained within the same
 17 database as ALL the data so there is potential for an
 18 auditor to pick up all the data due to human error.”
 19 By human error, he means accidentally stumbling
 20 across all the data, presumably?
 21 A. Yes.
 22 Q. It wouldn't be a mistake; it would actually be
 23 a serendipitous discovery?
 24 A. Sorry, can you say that last part --
 25 Q. Yes, it would be down to good luck that the auditor

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1 found, through this so-called human error, all the data?
 2 A. That's how it reads, yes.
 3 Q. Yes:
 4 "b) the daily records contain ALL the results which
 5 if they were audited would highlight the fact 'extra'
 6 thermal samples are not in the 'selected' database.
 7 "c) The thermal machine data ... are automatically
 8 saved ...”
 9 So what he is identifying here is that there are
 10 three particular methods by which an auditor could pick
 11 up all the data if they followed the process trail .
 12 Then he goes on:
 13 "This results in a logistic issue of having to
 14 manage the data to avoid an auditor finding evidence
 15 that thermals are selected to give lambda 22 rather than
 16 recording the results regardless of their value.”
 17 Pausing there, do you accept that that makes it
 18 clear to all of those persons receiving this technical
 19 report that Celotex were actively seeking to conceal
 20 this practice, this methodology, from auditors?
 21 A. Yes.
 22 Q. Would the auditors in question, at least in this
 23 instance, be the BBA?
 24 A. That's my understanding, yes.
 25 Q. He goes on to say:

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1 "With Circa 100 samples per month and a ' failure '
 2 rate of 40 to 50% this represents a high degree of data
 3 management and manipulation which is all down to human
 4 interaction to make decisions on what to keep or
 5 reject .”
 6 From that, although you might have thought data
 7 management was acceptable, did you realise that
 8 manipulation wasn't?
 9 A. I don't recall seeing the word "manipulation", and with
 10 the other people that were on the report of being in
 11 senior management/director positions --
 12 Q. Right. By the words "high degree of data management and
 13 manipulation", did you read that as fiddling the
 14 figures?
 15 A. I believe from what I was told, what the company were
 16 looking to do was interpret the standard for selecting
 17 data.
 18 Q. That's not what he is saying, is it? He is saying that
 19 with around 100 samples a month and a failure rate of 40
 20 to 50%, there is a high degree of data management and
 21 manipulation.
 22 A. Yes, that is what he is saying.
 23 Q. Yes, and I'm asking you whether you understood the "high
 24 degree of data management and manipulation" to be really
 25 a dressed-up way of saying fiddling the numbers, or

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1 manipulating the figures, to put it slightly more
 2 delicately, if you like .
 3 A. Yes, manipulating the numbers is what you could say.
 4 Q. Yes, then he gives option 1:
 5 "Retains all thermal data but offers the highest
 6 opportunity for human error in the process resulting in
 7 auditor queries.”
 8 He explains those particular elements of that
 9 option.
 10 Then if you go over the page {CEL00010272/2},
 11 option 2:
 12 "Retains only thermal data within the selection
 13 range ...
 14 "Summary option 2 - Data management is far less
 15 intensive but the ability to review ALL Hipchen thermal
 16 data is lost without having to refer to the thermal
 17 machine data file which would be a labour intensive
 18 process to extract and compile.”
 19 Then he has a summary, and he says:
 20 "Hipchen Lambda 22 by statistical method is data
 21 intensive under either option relying on those testing
 22 and data input to make the right decision and human
 23 error over 100 samples per month will occur at some
 24 stage.
 25 "From a data management/risk perspective Option 2

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1 would be the preferred method but the negative side is
 2 the loss of thermal data from the database for
 3 analysis - this would be my preferred option.
 4 "Ongoing there needs to be progress in achieving a
 5 Declared Lambda 22 via process/chemical improvements and
 6 not the statistical method which does not represent the
 7 actual population of the true lambda of the product
 8 being produced."
 9 Now, before I come back to that text, can I take you
 10 to your statement at page 3, your second statement,
 11 {CEL00012233/3}. At paragraph 14 there, in the last
 12 sentence, you say:
 13 "It appeared that the process for calculating lambda
 14 was perhaps open to interpretation and the Operations/QC
 15 Department had decided that if a minimum of one thermal
 16 result was selected per day then that fell within the
 17 rules of the standard."
 18 When you say "perhaps open to interpretation",
 19 in fact that's just a delicate way of avoiding the
 20 problem, isn't it? It wasn't open to interpretation at
 21 all; this was about how to go about massaging the
 22 figures.
 23 A. From what I have seen more recently when reviewing
 24 documents, and at my time at Celotex, where this wasn't
 25 really something that I got too involved in, you know,

1 being open -- you know, the process for being able to
 2 test one sample per day was something that the business
 3 felt was acceptable within the standard.
 4 Q. But that's not about the process being open to
 5 interpretation; it's the process being open to abuse.
 6 A. Yes, it could be argued that way. I think that was for
 7 others to decide whether that was what they wanted to do
 8 in running their business.
 9 Q. Is it right that, in effect, Celotex had adopted
 10 a practice of obtaining multiple data points for lambda
 11 and then simply selecting the most favourable, or
 12 narrowing the data down so that what was selected would
 13 produce 22 or thereabouts?
 14 A. I don't know exactly how it was done.
 15 Q. Going back to the document we were just on, the
 16 9 December 2009 technical report, please, if we could
 17 just go back to that {CEL00010272/2}, where we've seen
 18 the summary which I've read to you, the reality was,
 19 wasn't it, that as Mr Parker pointed out to you, Celotex
 20 needed a process to improve lambda to 22 through process
 21 and chemical improvements and not by what he called the
 22 statistical method, which he said "does not represent
 23 the actual population of the true lambda of the product
 24 being produced".
 25 Now, that's what he said. You must have realised

1 that this approach involved essentially lying with
 2 statistics .
 3 A. I don't think at the time I really gave the document --
 4 because of who else was on the document and the people
 5 that were making the decisions, and my limited time in
 6 the business at that time, I don't think I would have
 7 been really making any thoughts or any decisions on
 8 that.
 9 Q. No, you may not have been making any decisions about it .
 10 I haven't asked you about that, Mr Evans. What I'm
 11 really interested in is what you thought at the time.
 12 Did you not have any concerns at all about the
 13 legitimacy of the approach that was then being adopted,
 14 namely the statistical method as opposed to the
 15 process/chemical improvements approach?
 16 A. I don't recall having any concerns about it, mainly
 17 because it was for others to make that decision.
 18 Q. It may have been for others to make that decision, but
 19 did you not think at the time that this was a dishonest
 20 approach?
 21 A. I don't recall thinking anything at the time of what the
 22 approach was.
 23 Q. If we go to paragraph 15 of your second statement,
 24 please {CEL00012233/3}, you say there in the middle of
 25 that paragraph:

1 "I had no reason to doubt the recommendation from
 2 the Operations/QC Department and simply treated the
 3 matter as having been finally resolved at the very
 4 highest level as the approach that the company was going
 5 to take. I don't believe any external view or opinion
 6 was sought on this and from then on, the application of
 7 selective data in respect of lambda value was followed."
 8 How could you possibly not have had any doubts about
 9 the recommendation, given the technical report that
 10 we've just seen?
 11 A. Again, I probably didn't give that report that much
 12 attention on the basis that I was just one of six
 13 people, seven people to have received that report, and
 14 that would have been something for operations, quality
 15 control and the board to ultimately decide what they
 16 were going to do.
 17 Q. Now, if we go to page 4 of your statement
 18 {CEL00012233/4}, paragraph 18 -- this is your second
 19 statement -- you say there, in relation to lambda, that
 20 you had very little, if anything, to do with lambda data
 21 collection. That's what you say.
 22 A. Yes.
 23 Q. And you say in the third line:
 24 "... I never recall lambda being a major talking
 25 point up until a MAG meeting, sometime I believe in

1 2013/2014, the details of which formed part of my
2 disciplinary pack of documents.”
3 Pausing there, is it right that you were disciplined
4 over the lambda issue?
5 A. There was a disciplinary process, yes.
6 Q. Over the lambda issue?
7 A. Yes.
8 Q. And you were subject to disciplinary action in respect
9 of the lambda issue?
10 A. Yes.
11 Q. Yes.
12 “Craig Chambers, who took over from
13 Richard Pemberton as Managing Director, was present at
14 this meeting. I recall Joe Mahoney gave a presentation
15 about the company getting close to not being able to
16 declare its lambdas. The presentation inevitably
17 referred openly to the manner in which lambda values
18 were being selected at that time and, again, so far as
19 I can remember nobody at the meeting challenged the
20 approach being taken.”
21 Did that surprise you at the time? You had been in
22 the company now a number of years. Did it surprise you
23 that even the MAG were not challenging the approach
24 being taken in relation to lambda values?
25 A. No, I believe that the MAG team were of the view that as

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1 long as one result per day was taken, then that was
2 within the rules of the standard. That would have been
3 the thinking of the MAG team.
4 Q. Even though all the other results of the day would have
5 pointed to a lambda being something different?
6 A. I can't remember every slide on the presentation, but
7 I'm not sure how much of the detail that went into.
8 Q. Does the fact that the MAG, even in 2013/14, accepted
9 what you say about the lambdas here and the method of
10 going about collecting the data and presenting it, tell
11 us something about the business culture within Celotex
12 at that time?
13 A. At what time, sorry?
14 Q. 2013/2014.
15 A. Yes, I think so, and I think it says something about the
16 culture earlier as well.
17 Q. Yes. Did that -- well, you tell me in your words: what
18 does it tell us about the culture within Celotex at that
19 time?
20 A. I think the culture that was established for a business
21 that was -- had a number one strategy of exit made its
22 way into post-exit culture of the business. The culture
23 didn't change.
24 Q. And the culture was a culture of what?
25 A. Fast paced, quick decisions.

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1 Q. Fast paced, quick decisions; can you enlighten us
2 a little bit further?
3 A. The business just worked incredibly quickly and I don't
4 think had a culture of challenging.
5 Q. Not a culture of challenging; challenging what?
6 A. Challenging each other, challenging decisions that were
7 being made. I think too many people were left to just
8 do their job, and that's ultimately I believe what part
9 of the culture of Celotex was.
10 Q. Challenging the honesty and good faith of those
11 decisions, would you include that?
12 A. Challenging the reasoning behind them, yes.
13 Q. Challenging their honesty, Mr Evans?
14 A. You could say honesty, yes.
15 Q. Did that culture of not challenging the dishonesty of
16 decisions ever change during your time there?
17 A. I would like to think that there were -- that I didn't
18 make decisions like that, no.
19 Q. Well, we'll come to that. But did the culture of not
20 challenging the dishonesty of decision-making ever
21 change during your time?
22 A. Erm ... not as much as it should have done.
23 Q. Let's turn to FR5000. Can we go, please, to
24 {MAX00000216}. This is the datasheet for FR5000 issued
25 as issue number 2 in January 2012, Mr Evans.

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1 Are you familiar with this document?
2 A. Yes, I've seen this document.
3 Q. FR5000 is a PIR board, isn't it?
4 A. Yes.
5 Q. Did you understand at the time that that meant that it
6 was not a product of limited combustibility?
7 A. I didn't get too involved with that language of limited
8 combustibility, but yes, I would have been aware that it
9 wasn't limited combustibility.
10 Q. Right. When you say, "I didn't get too involved with
11 that language of limited combustibility", what do you
12 mean?
13 A. That language typically wasn't used to discuss or to
14 describe PIR insulation in the language of the business.
15 Q. No, I understand that. Is that because everybody
16 understood, yourself included, that because FR5000 was
17 a PIR, a polyisocyanurate product, it was not a product
18 of limited combustibility?
19 A. I'm not sure I would have ever considered those terms,
20 limited combustibility.
21 Q. Right.
22 If you look at this datasheet, you can see, about
23 halfway down the page, there is a set of bullet points,
24 six bullet points, and the fourth bullet point says:
25 "Has Class 0 fire performance throughout the entire

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1 product in accordance with BS 476.”
 2 When you became familiar with this document, did you
 3 note those words there?
 4 A. That statement is something that -- I can't remember
 5 when that was introduced into the 5000 range, but yes,
 6 it's a statement that I'm familiar with.
 7 Q. What does it mean? What does "Class 0 fire performance
 8 throughout the entire product" mean?
 9 A. So this was something -- and I can't remember the date
 10 that Celotex had passed the class 0 test. The
 11 5000 range competed with the Kooltherm range of
 12 products, the K range, and there was an observation in
 13 Kingspan's marketing literature that when they discussed
 14 class 0, there was a disclaimer that said it talked
 15 about the foam core only, and as Celotex's products were
 16 produced with the facers on the product, we tested the
 17 product with the facers on, and therefore that set of
 18 words was put together in our marketing material.
 19 Q. You tested the product with the facers on. Did you test
 20 it separately, without the facers, under 476?
 21 A. Not that I'm aware of.
 22 Q. What did you understand the significance of FR5000
 23 having class 0?
 24 A. Typically class 0 would have been a term that we knew
 25 was used within the specification world for insulation,

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1 something that our competitor, Kingspan, had in their
 2 range, and therefore when we were launching the
 3 5000 range, we wanted to have a product that competed
 4 with Kingspan.
 5 Q. Yes, what does class 0 mean?
 6 A. Sorry --
 7 Q. If I'm a contractor picking up your datasheet, what am
 8 I supposed to take from the fact that it has class 0
 9 fire performance?
 10 A. Technically it means it's passed part 6 and part 7 of
 11 BS 476. I'm not sure what it would have meant to
 12 a contractor. I think it would have meant something to
 13 more of a specification world, architects.
 14 Q. What did you think it would have meant?
 15 A. Just that it had a high level of -- a higher level of
 16 thermal performance -- of fire performance, compared to
 17 standard PIR, which only had class 1.
 18 Q. What did you understand that would signify to
 19 an architect or a contractor or anybody who had occasion
 20 to look at this document?
 21 A. That Celotex had a product in its range that, on class 0
 22 performance, competed with Kooltherm.
 23 Q. All right, let me try one more time.
 24 What does class 0 allow one to do with the product?
 25 A. It didn't allow them to do anything particularly with

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1 the product, it was a feature of the product.
 2 Q. Right.
 3 It's right, isn't it, that FR5000 was then later
 4 re-branded in 2014 to RS5000?
 5 A. Yes, we -- when we launched the RS5000 product, we used
 6 the FR board as its -- to launch.
 7 Q. Well, you used the FR board as the launch, but in fact
 8 RS5000 was the same product --
 9 A. Yes.
 10 Q. -- as FR5000, it just had a new name.
 11 A. Yes.
 12 Q. Yes.
 13 In relation to the manufacturing process for both
 14 FR5000 and RS5000, were you aware that they were
 15 manufactured on two production lines?
 16 A. Yes.
 17 Q. One was called Hipchen, and the other one was called
 18 Hennecke. Is that right?
 19 A. Yes.
 20 Q. Were those names given to them by the manufacturer of
 21 the machinery?
 22 A. The Hennecke, I believe so. The Hipchen I believe was
 23 named after the person that invented the type of
 24 technology of a free rise machine, which is essentially
 25 what the Hipchen machine was.

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1 Q. What did you understand the difference between these two
 2 lines to be?
 3 A. One was a free rise technology where, once the chemical
 4 was poured, it rose to a pre-determined thickness, and
 5 on Hennecke it was what was called fixed rise or
 6 restrained rise, would have been the language that
 7 Celotex used, which was essentially that it poured into
 8 a mould or a box within the machine that essentially was
 9 set at a particular thickness.
 10 Q. Which line was used for producing 100-millimetre FR?
 11 A. I believe the majority of the time it would have been
 12 the Hennecke line.
 13 Q. Right, the fixed riser?
 14 A. Yes, the fixed rise, yes.
 15 Q. If one wanted Celotex in measurements of 150 or
 16 160 millimetres of depth, which line would it come off?
 17 A. Hennecke.
 18 Q. Right.
 19 Can I ask you to look at {CELO0009889}, please.
 20 This is a change note in Celotex's database raised on
 21 29 August 2012. Let's just look at it together.
 22 In the left-hand box the change detail is:
 23 "Change the formulation for Hipchen produced FR5000
 24 and CG5000 to replace BASF ElastoPIR 1039/501 with
 25 ElastoPIR 1039/503."

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1 The reason, change reason:
 2 "Change to the formulation provides circa £20k
 3 saving per year based on 2012 forecast. This has been
 4 built into BP2013."
 5 BP, help me, is that budget projection?
 6 A. Business plan.
 7 Q. "DL12/072 reported no adverse effect on board
 8 performance or overall yield.
 9 "Any remaining 1039/501 stock will be used on the
 10 Hennecke line.
 11 "As agreed at PLCP/PDI, no external testing will be
 12 carried out."
 13 The review notes show, with a variety of dates, that
 14 one of the reviewers was you, Paul Evans, looks like
 15 30 August 2012.
 16 A. Yes.
 17 Q. Why were you in particular as product manager, as
 18 I think you were at that time, asked to sign off on this
 19 change note?
 20 A. There was lots of change notes raised in the business,
 21 and directors as well as other people in the business
 22 would have the opportunity to approve or to comment.
 23 Q. What, if any, consideration was given to the effect of
 24 this change in polyol on fire performance of FR5000?
 25 A. None by myself, because the decisions on chemical and

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1 formulation changes would have been decided by the
 2 operational, quality and kind of chemist teams in the
 3 business.
 4 Q. Can we go to {CEL00009516/2}, please. This is an email
 5 chain in early September 2012. If you go to page 2, as
 6 we're on there at the moment, and look at the top, this
 7 is an email of 10 September 2012 from Jodey Hammond, who
 8 was a plant chemist, to Ian Parker and Joe Mahoney,
 9 copied to you, and the subject was "Reminder: Change
 10 note #486":
 11 "Ian,
 12 "We are not intending to do any external testing as
 13 I am sure the BBA would require and this was discussed
 14 and agreed at the PLCP/PDI meeting."
 15 Pausing there, PLCP was product lifecycle and
 16 planning?
 17 A. Correct, yes.
 18 Q. And PDI was product development and innovation?
 19 A. Yes.
 20 Q. They're both committees, aren't they?
 21 A. Yes. They are the same, though, they're not two
 22 different meetings.
 23 Q. They are the same?
 24 A. Yes.
 25 Q. She goes on:

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1 "You can ask Joe to confirm but my understanding is
 2 that we haven't intended to make the change to the
 3 quality plan."
 4 Do you know why Celotex was not intending to do any
 5 external testing of FR5000 as a result of the change in
 6 polyol ingredient?
 7 A. I don't know why, no.
 8 Q. Were you involved in any discussion on that issue?
 9 A. Not that I can recall.
 10 Q. Did you support the decision to undertake no external
 11 testing?
 12 A. I would have supported a decision if it came from
 13 an operation or QC team that there was no reason to send
 14 the information into the quality plan.
 15 Q. If we go up a page, please, in the email run
 16 {CEL00009516/1}, we can see an email from Ian Parker,
 17 and he is the same Ian Parker we saw on the question of
 18 lambdas, even as early as 2009. He sends an email the
 19 same day, 10 September, to Jodey Hammond and the other
 20 recipients of her email:
 21 "Joe did discuss this with me - I was unaware of the
 22 PLCP decision.
 23 "You just need to beware that there is a possibility
 24 the BBA could pick this up when they audit incoming
 25 chemical receipts, and they did specifically inform us

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1 that any new chemicals should be highlighted to them
 2 following prior audits when they found we had made
 3 a number of chemical changes and not told them about
 4 it."
 5 Jodey Hammond's response to that is:
 6 "Perhaps it's my miss-understanding so I'll
 7 double check with Joe."
 8 Just looking at what Ian Parker said about not
 9 telling the BBA about chemical changes, is that correct,
 10 that when they had done prior audits, they discovered
 11 that there were chemical changes which had not been
 12 communicated to the BBA?
 13 A. I don't know the detail behind the previous audits.
 14 Q. You don't know the detail; did you know generally that
 15 the BBA had not been told about chemical changes in
 16 relation to FR5000?
 17 A. I know that, on occasions, not all changes to the
 18 chemical formulations or chemicals we were using in the
 19 products would be communicated to the BBA, and the
 20 operations and quality team would have their reasons for
 21 not doing that.
 22 Q. What were those reasons?
 23 A. From memory, it would be that they didn't feel that the
 24 chemical would have any material difference, and that
 25 the changes being made into the quality plan may take

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1 longer to implement and be approved than the business
 2 could allow before it needed to use those chemicals.
 3 Q. Right.
 4 Why was it for the operations and quality team to
 5 decide for themselves what they should and shouldn't
 6 tell the BBA, rather than simply giving the material to
 7 the BBA and letting the BBA make what it could of it?
 8 A. I don't know.
 9 Q. Is the answer as you have just given us: speed and
 10 a need to get sales done?
 11 A. Certainly speed, and a desire to want to make changes
 12 when changes could be made, rather than relying on
 13 others.
 14 Q. So is this again an example of Celotex's culture of
 15 withholding potentially material technical data from
 16 auditors?
 17 A. Yes.
 18 Q. Thank you.
 19 Now, let's move to FR5000 BS 476 tests. We have
 20 touched on this a moment ago. Let's go back to that
 21 topic.
 22 Do you remember that FR5000 was tested to BS 476-6
 23 and 7 in November 2011? Do you remember that?
 24 A. I don't remember 2011, but I remember the product --
 25 I remember it being tested.

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1 Q. Was it tested on both lines? In other words, was the
 2 test done in relation to the material coming off both
 3 Hipchen and Hennecke?
 4 A. My understanding when we did class 0 testing was that we
 5 tested the material from both lines.
 6 Q. Did you know whether that test was repeated at any later
 7 stage?
 8 A. I don't recall.
 9 Q. Is it right that you never did a test on the core of
 10 5000, FR5000?
 11 A. Class 0 test?
 12 Q. Yes.
 13 A. Just on the core only, no.
 14 Q. Did you know that you had done a BS 476-6 and 7 test in
 15 relation to the core of FR4000 in 2008? Did you know
 16 that?
 17 A. No.
 18 Q. You didn't?
 19 A. Not that I recall sat here today, no.
 20 Q. All right. So you can't help us explain the reasons why
 21 Celotex decided to test the core only of FR4000?
 22 A. No.
 23 Q. Right.
 24 Do you know why FR5000 was "class 0 throughout the
 25 entire product", as described, if the core itself had

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1 not been tested?
 2 A. From memory, the decision or the thinking behind that
 3 was that we had tested the product as it was supplied
 4 into the market with the facers on, and that's where
 5 that wording came from.
 6 Q. Yes, I see.
 7 Was any consideration given to re-testing the FR5000
 8 product under BS 476-6 and 7, so as to achieve a class 0
 9 classification after the polyol change in 2012 on the
 10 Hipchen line that we've just been discussing?
 11 A. I don't know.
 12 Q. You don't know whether it was or it wasn't, or --
 13 A. I don't know whether it was decided not to.
 14 Q. Right. Do you know for a fact that it wasn't?
 15 A. I don't know for a fact, no.
 16 Q. Right.
 17 Now, I want to turn to a different topic, which is
 18 above 18 metres, and look at the position in 2012.
 19 Now, we pick the story up in December 2012 at
 20 {CEL00002544}. This is a note of a meeting in
 21 manuscript of 15 December 2012 with Tony Baker of the
 22 BRE. As we understand it, this is a manuscript note
 23 taken by you of that meeting. Is that right?
 24 A. Yes.
 25 Q. The meeting is, as you see, 15 December.

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1 Do you have any independent recollection of that
 2 meeting, or is your recollection --
 3 A. No, I don't know whether that was a meeting or a phone
 4 call.
 5 Q. Ah, okay.
 6 Do you have any independent recollection of the
 7 meeting or phone call which gives us any more insight
 8 than this document?
 9 A. No.
 10 Q. Do you remember whether you were seeking advice from
 11 Tony Baker at the BRE about how a successful test could
 12 be undertaken in relation to FR5000 so as to allow you
 13 to enter the above-18-metre market?
 14 A. I believe there was an action assigned to me at a PLCP
 15 meeting to look at the requirements of testing for
 16 above-18-metre applications.
 17 Q. You say so, in fact, at paragraph 50 of your statement
 18 on page 14 {CEL00010058/14}, if we just pin that down.
 19 You will see there that you say:
 20 "I believe I arranged to speak with Mr Baker to
 21 complete the action given to me on the 17 October 2012
 22 PDI Action List."
 23 We can go back earlier in your statement to see
 24 that, but is that the basis on which or the reason for
 25 which you arranged to speak to Mr Baker?

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1 A. I believe so, yes.
 2 Q. And the reason was to -- is this right? -- work out from
 3 him what would be needed in order to get FR5000
 4 successfully past a BS 8414 test?
 5 A. I think it was more just to generally spec out the
 6 requirements, rather than at that time thinking about
 7 whether we were going to test or not.
 8 Q. Okay.
 9 Let's go back to the note, {CEL00002544}, please,
 10 and I would like to look at the right-hand side of that
 11 note, about halfway down. There is a little set of
 12 words on the right-hand side that says:
 13 "Rainscreen systems.
 14 "- Aluminium."
 15 Then there is something crossed out.
 16 Do you know or can you remember what was crossed out
 17 there?
 18 A. I don't know totally, no.
 19 Q. You don't know totally; do you know at all?
 20 A. It looks like it could say "facers".
 21 Q. Right, okay.
 22 Did Tony Baker tell you, do you remember, that
 23 aluminium was a particularly common cladding material?
 24 A. I wouldn't recall, sorry.
 25 Q. Now, if we go to the second page of this document

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1 {CEL00002544/2}, you say there at the very top of the
 2 page:
 3 "BS8414 is simply a fire [something] methodology
 4 with a result."
 5 What's the something? Can you help?
 6 A. No, I can't, I'm sorry. I can't understand what I've
 7 written underneath that.
 8 Q. No. Well, underneath -- oh, I see, underneath the
 9 squiggle?
 10 A. Yes.
 11 Q. No, all right.
 12 Did Mr Baker tell you, whatever is underneath the
 13 squiggle, that BS 8414 is simply a fire methodology with
 14 a result?
 15 A. I don't know whether they were Mr Baker's exact words or
 16 whether I've scribbled those down based on what he's
 17 told me.
 18 Q. Did he explain to you that the classification under
 19 BR 135 applied to the system as tested; in other words,
 20 it was a system test, rather than the component parts of
 21 that test?
 22 A. I don't recall what he would have said in regard to that
 23 on that call or meeting.
 24 Q. Right.
 25 We can see that you have noted down, just under the

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1 reference to BS 8414, "BR 135 - Annex A, Annex B" with
 2 a linking paragraph:
 3 "Pass criteria stipulated - part 1 of BS 8414,
 4 part 2 of BS 8414."
 5 So did you understand from that that the test was
 6 the 8414 test, and the criteria for passing was set out
 7 in BR 135, annexes A and B?
 8 A. I think I'm getting the information. Whether
 9 I understood it at the time or I'm just getting the
 10 information from Tony, I don't know.
 11 Q. You say underneath that:
 12 "3rd edition in January '13 will combine the annex A
 13 & B."
 14 So it looks from that that at this stage,
 15 December 2013, annexes A and B were something you were
 16 alive to?
 17 A. I wouldn't say alive to. I think I have been asked to
 18 carry out a task, and I've made a phone call to somebody
 19 at the BRE and they've given me information which I've
 20 written down.
 21 Q. Right.
 22 Then underneath that, about halfway down the page,
 23 it says:
 24 "Tony Baker - keep a watch on any potential
 25 partners."

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1 Do you see that?
 2 A. Yes.
 3 Q. Was that advice he gave you, do you think?
 4 A. I believe so.
 5 Q. Or was that you'd asked him to keep an eye out for you
 6 for any potential parents?
 7 A. I don't think I would have asked Tony. Tony might
 8 have -- keep an eye on whether he's having separate
 9 calls with people that are also looking to do testing
 10 and there could be partnership opportunities.
 11 Q. I see. So you were looking to Tony Baker to be, as it
 12 were, a broker, to broker a partnership relationship
 13 with other people who wanted to test?
 14 A. I wouldn't say a broker relationship. I would say if
 15 Tony knew that someone else was looking to do a test rig
 16 that was from the non-insulation market, then there
 17 could be an opportunity for the two companies to
 18 combine.
 19 Q. What would be the point of these potential partnerships?
 20 A. There would have been a cost-sharing opportunity on the
 21 testing. It would have been an opportunity for people
 22 to -- both want to be testing and being in the above-18
 23 market.
 24 Q. Did you understand that that was because it might be
 25 difficult for FR5000 to pass an 8414 test without

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1 a robust external cladding?
 2 A. No. I don't believe that was any part of the
 3 conversation. I think we're just literally getting some
 4 very early-stage scoping of the requirements for
 5 above-18-metre testing.
 6 Q. Did Mr Baker discuss Kingspan's testing to BS 8414 with
 7 you at that time?
 8 A. I don't believe so. I don't recall.
 9 Q. It's right, isn't it, that from the summer of 2012, so
 10 six months or so before this meeting, Celotex had
 11 started to keep a spreadsheet of lost opportunities; is
 12 that right?
 13 A. That's right.
 14 Q. Was that business that had been lost through not having
 15 a product which could have been used above 18 metres?
 16 A. It was, yes, it was a spreadsheet where our sales
 17 managers would make the business aware of projects which
 18 K15 had been used on that Celotex couldn't be used
 19 because we didn't have a solution above 18 metres.
 20 Q. If we go to {CEL00008573}, please, this is
 21 a spreadsheet. We need the offline version of this
 22 document, I think.
 23 (Pause)
 24 It's just coming up. This is a spreadsheet called
 25 "Above 18 metre lost opportunities".

1 Just casting your eye down it, is it a familiar
 2 document to you?
 3 A. I recall the document being introduced, yes.
 4 Q. Who introduced it?
 5 A. I can't totally recall. I believe I may have kept the
 6 information that came through from the area sales
 7 manager.
 8 Q. Right, I see. So do you think it was you who compiled
 9 this document?
 10 A. I can't be 100% certain.
 11 Q. All right.
 12 Although I think we can't see it on here, we can
 13 date this, I think, to August 2012.
 14 Looking at it, you can see, I think, that the volume
 15 of lost orders that's recorded is 70,840.
 16 A. Yes.
 17 Q. That's square feet, is it, or square metres?
 18 A. Square metres.
 19 Q. Did that confirm your view that the development of
 20 a product suitable for use above 18 metres would have
 21 been a significant business opportunity for Celotex?
 22 A. I think it showed it was an opportunity; I don't know
 23 whether I would have said it was significant at that
 24 point.
 25 Q. Looking at the document, you can see, I think, various

1 dates running from August 2012 to January 2013.
 2 Was this a document that was, as it were, a living
 3 document that you updated when you got information from
 4 the ASM which you'd then input?
 5 A. Yes.
 6 Q. Right. So by January 2013, it was clear to you that
 7 70,840 square metres of business had been lost between
 8 August 2012 and January 2013, a matter of some
 9 five months or so only, as a result of not having
 10 a product which could be deployed in the above-18-metre
 11 market?
 12 A. I wouldn't say it was lost business; I would say it was
 13 giving an idea of the different types of projects and
 14 their volumes, and that totalled that number.
 15 Q. All right. Ungained business, then, if you like.
 16 Business that you didn't win because you didn't have --
 17 A. Business that we weren't able to supply a product for,
 18 yes.
 19 Q. Can I then turn to another topic, which is your
 20 knowledge of Approved Document B and specifically
 21 BS 8414.
 22 Can we go to {CEL00002894}. Now, this is a document
 23 dated 17 October 2012, and I think I'm right in saying
 24 that it's the document that led to you going to meet
 25 Tony Baker at the BRE in mid-December, or talking to

1 Tony Baker in mid-December.
 2 A. Yes.
 3 Q. It's an action list /follow-up from a PDI action list,
 4 which is what it is, dated 17 October 2012, and the
 5 location is the Bretton House boardroom. Does that tell
 6 us this was a PDI meeting --
 7 A. Yes.
 8 Q. -- on that date?
 9 Is it right that the PDI later became the SPINN
 10 committee?
 11 A. Yes.
 12 Q. Could you tell us, what does SPINN stand for?
 13 A. It stood for service and product innovation.
 14 Q. What's the second N?
 15 A. I think innovation was just --
 16 Q. Oh, I see.
 17 A. Double N for innovation.
 18 Q. Right.
 19 Does the use of the word "SPINN" as an acronym tell
 20 us anything about the Celotex culture?
 21 A. No.
 22 Q. Right. Easy to deny, but actually it rather does,
 23 doesn't it?
 24 A. The idea behind the SPINN was -- the SPINN meeting being
 25 formed is that we wanted to change how some of the

1 product launch processes were happening once
2 Saint-Gobain owned the company, and we looked at putting
3 a name to it, and we wanted to include services in there
4 as well as products, which is why services led at the
5 start of SPINN.

6 Q. Right.

7 Item 11 is "Spec requirements for above 18m fire
8 test", and we can see from the column towards the
9 right-hand side, "Resp", "PE". Is that "Responsibility:
10 Paul Evans"?

11 A. Yes.

12 Q. In your statement you say -- and I don't think you need
13 to go to it, it's paragraph 48 on page 14
14 {CEL00010058/14} -- that you can't remember being tasked
15 with this.

16 Do you recall whether you did any research into the
17 testing requirements for above 18 metres?

18 A. Not that I recall.

19 Q. I wonder whether we can date your familiarity with some
20 of the statutory requirements or guidance requirements.
21 Can we go to {CEL00002879}. This is an email from
22 July 2011, from Rob Warren, 6 July 2011, and you're
23 copied in on this, and the subject is "18.5m building":

24 "Approved Document B volume 2 (buildings other than
25 dwellings)."

1 Then Rob Warren sets out what in fact was
2 section 12.7 of Approved Document B, although I don't
3 think he says so:

4 "Insulation materials.

5 "In a building with a storey 18m or more above
6 ground level any insulation product, filler material
7 (not including gaskets, sealants and similar) etc. used
8 in the external wall construction should be of limited
9 combustibility (see Appendix A).

10 "Materials of limited combustibility are defined in
11 Table A7:

12 •" Non combustible material listed in table A6

13 •" Density more than 300 kg/m3

14 •" non combustible core with 0.5mm thick facings

15 "Class 0 is defined in the [bold] internal lining

16 materials section only. So, the fact that FR gets
17 class 0 is not relevant when used in an internal
18 [I think he means external] wall system above 18m where
19 it must be of limited combustibility as defined in
20 Table A7."

21 When you got that email in the summer of 2011, did
22 you read it?

23 A. I don't recall.

24 Q. Can we take it, though, from this document, that you
25 were aware of at least these requirements in Approved

1 Document B?

2 A. No, I think Rob has copied me in to an email there, but
3 I wouldn't -- if I'd have read the -- if I did read the
4 email, I'm not sure the detail would have been something
5 that would have stayed with me.

6 Q. He obviously thought that it was important for you to
7 understand this technical detail. Presumably you
8 understood that that is what he wanted you to do, to
9 read it and understand it; yes?

10 A. By sending it to me, yes.

11 Q. Yes. Therefore, given that that is what you understood
12 him to want, did you take steps to read it and try and
13 digest what it was saying?

14 A. I don't recall whether I read it or not.

15 Q. Do you remember at least this much: being aware that
16 there was a distinction between class 0 on the one hand
17 and the concept of limited combustibility on the other?

18 A. I don't believe it's from this email, but I was aware
19 that there was no link between class 0 of an insulation
20 product and its suitability to be used as an insulation
21 product in buildings above 18 metres.

22 Q. Yes, right. And was that something you were always
23 aware of at Celotex or were only aware of from 2011
24 onwards, having got this email from Rob Warren?

25 A. I wouldn't be able to say from when.

1 Q. Right.

2 Given that knowledge, do you know why Celotex
3 prominently advertised the fact that FR5000, and
4 subsequently RS5000, achieved class 0?

5 A. As a -- to make -- to compete with Kingspan.

6 Q. I understand commercially why you would want to have
7 those words in a document that said that, but in
8 technical terms, for technical reasons, did you ever
9 understand why it was that Celotex would prominently
10 advertise the fact that RS5000 or FR5000 had class 0 in
11 circumstances where class 0 had got nothing to do with
12 the use of insulation above 18 metres?

13 A. Not the technical reasons, no.

14 Q. Right. So do we take it from that that your
15 understanding only went marketing deep, if I can put it
16 that way?

17 A. I think it went more than marketing deep insofar as
18 understanding the background, but my recollection is
19 that we didn't have that technical deep discussion.

20 Q. Then Mr Warren goes on in the next paragraph and he
21 says:

22 "However if I was arguing this case I would say
23 that the clue is in the 'In a building with a storey 18m
24 or more above ground level'. To me that means that the
25 storey itself must be 18m above not the actual height of

1 the building. Approved document B is, after all,
 2 designed to protect people who may need to escape in the
 3 event of a fire and there will be nobody above 18m!"
 4 Were you aware of Celotex ever giving advice that
 5 FR5000 could safely and compliantly be used over
 6 18 metres based on that argument?
 7 A. Not that I'm aware of, no. My understanding was that if
 8 we had a project above 18 metres, the answer was always
 9 it can't be used.
 10 Q. Yes.
 11 Can we go to {CEL00001196}, please. In showing you
 12 this document, we go forward in time to November 2013.
 13 We may go backwards in time as well, but I just want to
 14 look at this document before the break.
 15 This is a presentation entitled "Above 18m Update",
 16 and it dates from 4 November 2013, and we believe that
 17 it relates to a meeting that was held on that day with,
 18 among other people, Mr Jonathan Roper. Do you recall?
 19 A. Yes.
 20 Q. Yes?
 21 A. I believe this is -- yeah, from seeing the documents
 22 I've reviewed, I believe this is the presentation that
 23 was given to a group of people in Celotex by Jon Roper.
 24 Q. On that day?
 25 A. I believe so.

1 Q. If we go to page 2 {CEL00001196/2}, this is an extract
 2 of paragraph 12.5 of ADB. Now, can we take it that, at
 3 least by this date, you were aware that this set out
 4 that an external wall should meet one of two routes in
 5 order to comply with Approved Document B: either that
 6 the insulation should be of limited combustibility, or
 7 it should have passed a BS 8414 test and thereby
 8 satisfied the criteria in BR 135?
 9 A. Yes, I knew that for Celotex to be in the above-18-metre
 10 market, it needed to have gone through the BS 8414 test.
 11 MR MILLETT: Thank you, yes.
 12 Mr Chairman, it's a minute or two shy of 1 o'clock,
 13 but that's a convenient moment.
 14 SIR MARTIN MOORE-BICK: Well, never mind. I think it is,
 15 yes.
 16 Mr Evans, we will have a break now so we can all get
 17 some lunch.
 18 THE WITNESS: Okay.
 19 SIR MARTIN MOORE-BICK: We will come back at 2 o'clock,
 20 please. I have to ask you on this occasion and no doubt
 21 others as you leave the room, please don't talk to
 22 anyone about your evidence or anything relating to it
 23 while you're out of the room.
 24 THE WITNESS: Okay.
 25 SIR MARTIN MOORE-BICK: All right? Thanks so much. Would

1 you like to go with the usher, please.
 2 (Pause)
 3 Thank you. 2 o'clock, please. Thank you.
 4 (1.00 pm)
 5 (The short adjournment)
 6 (2.00 pm)
 7 SIR MARTIN MOORE-BICK: Right, Mr Evans, ready to carry on?
 8 THE WITNESS: I am, thank you.
 9 SIR MARTIN MOORE-BICK: Thank you very much.
 10 Yes, Mr Millett.
 11 MR MILLETT: Mr Evans, can I ask you, please, next, to go to
 12 {CEL00009531}. This is an email sent by Jamie Hayes to
 13 you, among other people, on 30 May 2014. Jamie Hayes is
 14 a technical services officer. He says:
 15 "Hi all,
 16 "The first article is interesting for those of us
 17 involved in the 18m project."
 18 Before I show you what he is sending you, the
 19 18-metre project was at that time a marketing or
 20 presentational initiative to access the 18-metre market,
 21 wasn't it?
 22 A. Yes.
 23 Q. And to drive a Celotex product into that market; yes?
 24 A. Yes, to have a solution in that market, yes.
 25 Q. To have a solution in that market. When you say

1 a solution, do you mean a product?
 2 A. A product, yes.
 3 Q. By this stage, end of May, I think you had become head
 4 of marketing, hadn't you?
 5 A. 1 May 2013, yes.
 6 Q. So this was 30 days into that role.
 7 A. Yes.
 8 Q. Can we look at what he attaches at the bottom of page 1
 9 and over to page 2. It's something called
 10 Red Book Live. Do you know what that is?
 11 A. I've heard of Red Book Live, yes.
 12 Q. What is it or was it?
 13 A. It's a publication, I believe, produced by the BRE where
 14 there are products and systems related to applications
 15 that are listed.
 16 Q. If you go to page 2 {CEL00009531/2}, please, there is
 17 an article within it which has a caption, as you can see
 18 at the top of the page:
 19 "The latest high profile fire in the UAE has
 20 reaffirmed the need for properly approved, installed and
 21 maintained cladding systems in high-rise buildings."
 22 That's a quotation from Dr Debbie Smith OBE,
 23 director of fire sciences and building products,
 24 BRE Global.
 25 When this came, did you read this document and, in

1 particular, that part of it?
 2 A. I don't recall either.
 3 Q. Were you aware in general terms of the importance of
 4 complying with the Building Regulations?
 5 A. Yes.
 6 Q. Were you aware of the fire in the UAE that's been
 7 referred to here in this part of this document?
 8 A. I don't believe so.
 9 Q. Do you remember that there was significant coverage of
 10 fires in Dubai in 2015 and 2016 in industry
 11 publications?
 12 A. Not that I recall, no.
 13 Q. Were you aware in general terms of the fires in
 14 2012/2013 in the UAE involving cladding on the exterior
 15 of high-rise buildings?
 16 A. I don't believe so at the time.
 17 Q. Does that tell us that you weren't aware that those
 18 external cladding fires had involved ACM panels?
 19 A. I wouldn't have known that detail, no.
 20 Q. Right.
 21 In general terms, did you have any understanding at
 22 the time that ACM panels were being used which involved
 23 or included the use of a core comprised of polyethylene?
 24 A. I don't believe the term "ACM" would have meant a huge
 25 amount to me, no.

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1 Q. In 2013?
 2 A. No.
 3 Q. What about later?
 4 A. Even later, I don't believe it was a term that I saw
 5 a lot.
 6 Q. Was it not?
 7 A. ACM I know, with the benefit of having seen documents,
 8 aluminium, et cetera, but I didn't have a huge amount of
 9 detail -- of knowledge about ACM and the different types
 10 of ACM.
 11 Q. Leaving aside the question for the moment of ACM, were
 12 you aware in general terms that installing combustible
 13 rainscreen panels as cladding on the exterior of
 14 a building was likely to increase the risk of
 15 fire spread over the external surface of the building?
 16 A. Sorry, can you say that again, please?
 17 Q. Were you aware at the time that installing combustible
 18 rainscreen panels as cladding material on the exterior
 19 of a building was likely to increase the risk of
 20 fire spread over the exterior surface of the building?
 21 A. I was aware that there was different types of cladding
 22 panels that needed to make sure that that didn't happen,
 23 but I wouldn't have known the technical detail to what
 24 that meant or what they were.
 25 Q. Right.

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1 Can I turn to the topic of Jon Roper and his role in
 2 the above-18-metre project.
 3 Mr Roper joined Celotex in 2012, didn't he?
 4 A. Yes.
 5 Q. Like you, he had a degree in business management --
 6 A. Yes.
 7 Q. -- but no technical qualifications, as he has told the
 8 Inquiry.
 9 A. No, he joined straight from university, I believe.
 10 Q. Indeed, with no technical qualifications.
 11 A. No.
 12 Q. As you say in your statement -- we don't need to turn it
 13 up, it's paragraph 17 on page 5 {CEL00010058/5} -- it
 14 was his first job as a graduate, fresh out of
 15 university.
 16 A. Yes.
 17 Q. You, I think, were his line manager.
 18 A. I was.
 19 Q. And you were his line manager when he came into Celotex?
 20 A. Yes.
 21 Q. And throughout his time there at least until
 22 October 2014, isn't that right?
 23 A. Jon left the marketing department to join the sales team
 24 around that time, yes.
 25 Q. And then Debbie Berger took over from him.

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1 A. And Debbie Berger -- there was kind of a phased
 2 handover, so whether it was fully in October, I don't
 3 know, but yeah.
 4 Q. Until you became head of marketing in May 2013, was he
 5 the only person you were line managing?
 6 A. Yes.
 7 Q. Did your promotion to head of marketing in May 2013 make
 8 any difference to the degree to which you supervised
 9 him?
 10 A. It would have meant that I was then managing another
 11 part -- another function of the marketing department,
 12 the marketing communications, so, yes, my attention
 13 would -- from a line management perspective, I would
 14 have been line managing more people.
 15 Q. But did the fact that you were managing more people make
 16 any difference to the degree of supervision which you
 17 exercised over Mr Roper's work?
 18 A. Not that I recall, no.
 19 Q. Okay.
 20 Can we go to your statement, please, at page 15
 21 {CEL00010058/15} and go to paragraph 54. You say there:
 22 "As the effective Manager of the Project ..."
 23 That's with a capital P. Just for those looking at
 24 that statement for the first time, that's the
 25 above-18-metre project, is it?

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1 A. Yes.
 2 Q. You say:
 3 "... it was Mr Roper's role to lead it and do the
 4 day to day work on it. Mr Hayes' role was to provide
 5 some technical expertise when needed."
 6 Did you consider that Mr Roper was adequately
 7 experienced, suitably old and technically qualified to
 8 lead a project of this importance, the above-18-metre
 9 market project?
 10 A. I don't believe I considered it, no.
 11 Q. You didn't consider it?
 12 A. Only on the basis that there was other people across the
 13 Celotex business that could support, in the same way
 14 that I had received support when I was in a similar
 15 position to Jon Roper, that would give him the required
 16 technical knowledge and other knowledge that he would
 17 need to do to support the role in effectively managing
 18 the project.
 19 Q. When did you give Mr Roper the role of manager of the
 20 project?
 21 A. I can't be 100% certain, but I believe it would have
 22 been towards the end of ... at some point in early 2013,
 23 maybe. I've seen something where Jon's KPIs were -- key
 24 performance indicators, sorry, had this project within
 25 them, and they were dated January 2013.

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1 Q. They were, and we'll come to that document in due
 2 course, Mr Evans. But certainly by January 2013?
 3 A. Yes.
 4 Q. So it would have been before then, of course, but you
 5 can't remember precisely when.
 6 When you appointed Mr Roper the effective manager of
 7 the above-18-metre project, did you consider whether he
 8 was the most suitable, experienced, technically
 9 qualified person to run a project of that importance?
 10 A. I think the decision was more based around the product
 11 managers were primarily the people that ran projects in
 12 the same way that I had experienced, and therefore it
 13 was the natural thing for Jon to get involved in.
 14 Q. Why did you pick him?
 15 A. Well, if it was for -- if it was a product manager, he
 16 was the only product manager in the business.
 17 Q. I see. Did you not have second thoughts, given his
 18 youth and inexperience?
 19 A. On the basis of the knowledge I knew that Jon would have
 20 around the business in helping him, then no.
 21 Q. You mean given that you knew that Mr Roper would have
 22 plenty of help if he needed it from those around you?
 23 A. Yes.
 24 Q. That's what you mean in the last answer, is it --
 25 A. Yes, I do.

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1 Q. -- to be clear?
 2 You then go on in paragraph 54 to say:
 3 "Mr Hayes' role was to provide some technical
 4 expertise when needed."
 5 Did you consider that Jamie Hayes had technical
 6 expertise?
 7 A. I'm not sure I considered it. I'd worked with Jamie
 8 for -- or knew of Jamie working for longer in the
 9 business, as almost Rob Warren's sort of
 10 second-in-command in the technical centre, so I would
 11 have had no doubt that Jamie had that technical
 12 knowledge to support Jon.
 13 Q. He had no technical qualifications himself, did he?
 14 A. I don't know. I don't believe so.
 15 Q. Now, would it be fair to say that, certainly up to
 16 October 2014 when he left to go to the sales department,
 17 you effectively micromanaged Mr Roper's work?
 18 A. No, I wouldn't say micromanaged.
 19 Q. You were aware of everything he was doing and closely
 20 supervised it?
 21 A. I was aware of what Jon's workload was, in the same way
 22 I was aware of other people in the team's workload, but
 23 I wouldn't describe myself as micromanaging, no.
 24 Q. Not in the sense of doing his work for him, but when I
 25 use the word "micromanage", it's a word that's used by

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1 other witnesses of your attitude to supervising him.
 2 You don't agree with that; is that right?
 3 A. Not based on my definition of micromanaging, no.
 4 I liked to know -- I was new to being a head of
 5 marketing, so maybe compared to other managers' style,
 6 maybe I was closer to certain parts of different
 7 people's roles, but I wouldn't describe that as
 8 micromanaging, no.
 9 Q. Would you say that you supervised Mr Roper's work on the
 10 above-18-metre project closely?
 11 A. I had a general understanding of what Jon was doing, and
 12 knew that he had support around him with the likes of
 13 Jamie to help him --
 14 Q. Yes.
 15 A. -- and others.
 16 Q. That's not quite an answer to my question. I will press
 17 you a little .
 18 Would you say that you supervised Mr Roper's work on
 19 the above-18-metre project closely? Did you follow what
 20 he was doing closely?
 21 A. Yes, I believe I did.
 22 Q. Yes. I mean, you can't, sitting there, recall an area
 23 of work or thing he did or project he ran without you
 24 knowing about it, for example?
 25 A. Oh, no.

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1 Q. And he would periodically update you?
 2 A. Yes, he would update me, if -- whether that was through
 3 a sit -down review or informally.
 4 Q. Yes, and you were copied in on all the emails, or very
 5 many, most of the emails, that he would have sent or
 6 received in relation to the above-18-metre project.
 7 A. I don't know whether I was copied in on what percentage,
 8 I don't know how many he would have sent, but I know
 9 I've been copied in on quite a lot, based on what I've
 10 had to review, yes.
 11 Q. Can we look at {CEL00002900}, please. This is the
 12 document I think you referred to a few moments ago in
 13 your evidence. It's entitled "Objectives/KPIs for
 14 2013", and the date is at the bottom left -hand corner:
 15 "PE January 2013".
 16 Did you draft this document?
 17 A. Yes.
 18 Q. In January 2013?
 19 A. I don't know whether it was done in 2013, but on the
 20 basis it says 2013, and generally we issued KPIs for our
 21 team at the start of the calendar year, then yes.
 22 Q. You can see as objective number 4:
 23 "Implementation of BIM into Celotex specification
 24 service offering."
 25 What was that?

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1 A. That was Celotex having its products, what's called --
 2 suitable for what's called building information
 3 modelling.
 4 Q. Right.
 5 Then if you look at item 5, objective number 5:
 6 "Accreditation for FR5000 for use in above 18m
 7 applications."
 8 That was to be achieved by December 2013, and the
 9 measure there was to, "Test report and launched to sales
 10 team". So does that tell us that, at the beginning of
 11 2013, your objective or KPI was to get FR5000 accredited
 12 for above-18-metre applications and launched and out to
 13 the sales team by the end of the year?
 14 A. Yes.
 15 Q. And that that would give a 20% weighting in the KPIs for
 16 individual salespeople?
 17 A. It would mean that Jon would have achieved 20% of his
 18 KPI target, yes.
 19 Q. Right. Now, that leads to my next question: were these
 20 objectives and KPIs solely for Jon Roper or were they
 21 for other people too?
 22 A. No, looking at them all, everybody in the team and
 23 everybody in the business would have had their own
 24 objectives and KPIs.
 25 Q. And were these for Jon Roper?

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1 A. Yes.
 2 Q. And only him?
 3 A. Yes.
 4 Q. Thank you.
 5 Can we understand the weighting. The weighting, as
 6 you can see, is divided into six parts, different
 7 percentages, arriving at 100%.
 8 If you hit 100%, what would happen?
 9 A. So you would achieve 100% of your KPI target, which was
 10 also linked to the business's financial bonus scheme
 11 that they ran.
 12 Q. Right. So you got a bonus over and above your salary if
 13 you hit 100%?
 14 A. You didn't have to hit 100% to achieve the bonus.
 15 Q. Right. What if you hit 30%?
 16 A. I don't know. I don't think anybody in the team ever
 17 hit 30%, so ... so let's say there was -- the way it
 18 used to work is that a certain amount of percentage of
 19 salary was assigned to everybody for hitting their
 20 targets. So if they achieved 100% of their target, they
 21 received 100% of the bonus. So, to answer your
 22 question, they would have received 30% of the bonus.
 23 Q. I see. So accreditation for FR5000 was, to Jon Roper,
 24 worth 20% of the potential bonus?
 25 A. Yes.

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1 Q. What was the proportion in 2013 of the bonus to the
 2 salary, Jon Roper's bonus to Jon Roper's salary?
 3 A. At that time the number changed slightly, but on average
 4 the bonus I think paid about 10% --
 5 Q. Right.
 6 A. -- per year.
 7 Q. I see. So succeeding on accreditation under item 5
 8 would give him 20% of 10% of his salary?
 9 A. Yes.
 10 Q. Were there any consequences for failing to meet these
 11 targets, other than not getting the percentage of the
 12 bonus?
 13 A. Not that I ever experienced, no.
 14 Q. Right.
 15 Can we then look a little bit more closely at the
 16 research done for the 18-metre project. Can we go to
 17 {CEL00001340}, please. This is a document called "Above
 18 18m action plan", and if you look at the footer on the
 19 first page, and we will have to flick up to that, in the
 20 bottom right-hand corner it says, "Prepared By: JR
 21 March 2013".
 22 Did you have any input into this document?
 23 A. I don't believe so.
 24 Q. And the JR there is Jon Roper?
 25 A. Yes.

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1 Q. Did you ask him to prepare it?
 2 A. I don't know.
 3 Q. Would he have prepared this document without your asking
 4 him to do so?
 5 A. Based on his experience at the time, unlikely, no.
 6 Q. Right.
 7 We can see under "Findings" in the second sentence
 8 there:
 9 "Between August 12 & Jan 13, Celotex recorded lost
 10 opportunity from not having above 18m was 70,000 sq/m."
 11 That's something that we saw from the spreadsheet
 12 this morning, isn't it?
 13 A. Yes.
 14 Q. "It is one of two gaps in which we cannot compete with
 15 Kooltherm products. Only Kingspan K15 & Xtratherm's
 16 Safe-R market that they have achieved above 18m fire
 17 accreditation. Both are in accordance with BS 8414:1
 18 onto a masonry wall."
 19 So one gap was the Kingspan Kooltherm gap. What was
 20 the other gap, do you remember?
 21 A. I'm trying to think of the ... no, I don't recall.
 22 Q. Either way, is it fair to say that this document, when
 23 produced to you by Jon Roper in March 2013, identified
 24 to you that the above-18-metre market was seen as
 25 a significant commercial opportunity for Celotex?

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1 A. Yes.
 2 Q. Indeed, that is why you tasked him with the
 3 accreditation of FR5000.
 4 A. Yes, it was a gap that Celotex had in its product range,
 5 and the launch of the 5000 range, the strategy of the
 6 company was to make sure that we had products that could
 7 compete with Kingspan Kooltherm.
 8 Q. Well, you say the launch of the 5000 range; that already
 9 existed, didn't it?
 10 A. Yes, but when we launched that range, there was only --
 11 there were some applications which we didn't compete
 12 with.
 13 Q. One of which was above 18 metres?
 14 A. Yes, and I've just remembered, I believe the second one
 15 was the plasterboard laminates, K17 and K18.
 16 Q. Why have you just remembered that?
 17 A. Because I have been thinking about the different
 18 Kooltherm products that were in the range.
 19 Q. There is nothing in this document that --
 20 A. No, that's my knowledge.
 21 Q. -- jumped out at you on that issue? Right.
 22 I want to ask you some questions now about Sotech.
 23 Can we go to {CEL00001851}, please. This is
 24 an email run from June 2013, and it starts at the top
 25 with an email from Jonathan Roper to you, and the

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1 subject is "RE: Paul Tollervey".
 2 I would like just to look at that email, and it says
 3 in that email there, in the second paragraph:
 4 "Will start to put together a process map. Had
 5 a conversation with the guy I met at the RIBA event from
 6 Sotech-Optima this morning. Seems to have a huge amount
 7 of experience testing to part 1 and part 2.
 8 Interestingly, they've only tested using Rockwool Duo
 9 Slab as when originally using K15 in their system, the
 10 test failed twice! They then reverted to Rockwool and
 11 passed but warned that PIR isn't the easiest of
 12 materials to fire test. He suggested IFC, CX & Sotech
 13 arrange a meet. Sotech [definitely] seem valuable and
 14 in particular their MD John who stayed down at Watford
 15 for two weeks straight ensuring every detail of the
 16 structure was put together correctly."
 17 Did you have any further discussion with Mr Roper
 18 about the failed K15 tests following receipt from him of
 19 this email in June 2013?
 20 A. Not that I recall, no.
 21 Q. Did you ask him what he meant by "PIR isn't the easiest
 22 of materials to fire test", as we see there?
 23 A. I don't believe so, no.
 24 Q. Did you not understand from this email that you would
 25 have difficulty designing a system which would meet the

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1 BR 135 criteria using PIR?
 2 A. I don't recall what -- when I read this email, what my
 3 thinking was. I know that Jon was on a market
 4 research/market scoping exercise, and there seemed to be
 5 other people that he was able to meet, IFC and Sotech
 6 for example, that would be able to take that knowledge
 7 further.
 8 Q. Did you know that Mr Roper then did meet Sotech later in
 9 the month, later in June 2013?
 10 A. I know he met with Sotech. I wouldn't recall exactly
 11 when that was.
 12 Q. Okay. Let's have a look at {CEL00001863}, please.
 13 These are notes of his meeting with Sotech on
 14 22 June 2013.
 15 Do you remember seeing these notes? Did he send you
 16 these notes?
 17 A. I believe he did, yes.
 18 Q. If we go halfway down the page, we can see it says:
 19 "Sotech & BS 8414-1/2:
 20 "... Both systems incorporated Rockwool insulation
 21 and AIM fire barriers. Part 2 testing provisionally
 22 used K15 as the insulation, forced upon by Metsec who
 23 built the steel frame. 15 minutes testing, BRE
 24 extinguished the chamber due to fire being at the
 25 9 metre level using K15. Sotech reverted to Rockwool

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1 and passed. [Aluminium] railing system and cladding
2 panels found to melt and allow fire to enter cavity.
3 Outer face resistance to fire and tolerance of fire
4 barriers proven to be crucial."

5 Now, you were told here, clearly, that the success
6 of the test is often dependent on the cladding material
7 that's used. You could see that.

8 A. Yes.

9 Q. Specifically in relation to cladding materials, he says,
10 and I've read it to you, that "[Aluminium] railing
11 system and cladding panels found to melt and allow fire
12 to enter cavity".

13 Did you take from that that this made it clear that
14 it was unlikely that it would be possible to test PIR,
15 RS5000 as it became, with aluminium cladding in the test
16 rig?

17 A. I don't recall having any thinking about aluminium and
18 cladding panels. I think what was developing over this
19 time is a knowledge that you need -- not all rainscreen
20 cladding systems will pass BS 8414.

21 Q. And it would depend upon the individual components of
22 the particular rig being tested?

23 A. Yes, there was -- yeah, the component parts, yes.

24 Q. Yes.

25 Then if you look a little bit lower down, it says,

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1 "K15 BBA Certification & Literature" as a heading, and
2 the note starts:

3 "Astonished as to how K15 is used so widely based on
4 testing involving a cement particle board as the outer
5 face to represent a typical cladding panel."

6 It goes on:

7 "Identified that K'span used Promaseal
8 fire barriers ..."

9 Just pausing there, it was both Jon Roper and the
10 Eggintons from Sotech who expressed the astonishment
11 about how K15 could be used so widely, given what they'd
12 tested.

13 Did you know that or did you take that from this
14 note?

15 A. I don't know where the astonished -- yeah, didn't know
16 who was astonished -- wouldn't have known who was
17 astonished from that note, whether it was a point made
18 from Jon or from other people in the meeting.

19 Q. Right.

20 In your statement at page 17 {CEL00010058/17}, you
21 deal with this note at paragraph 64, and you say:

22 "The note also recorded 'Astonished ...'"

23 And then you quote extensively from the note, and
24 then you say:

25 "I do not recall what my thoughts were on reading

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1 this at the time. I assume now that the astonishment was
2 on the part of Sotech individuals, rather than Mr Roper.
3 I do recall a developing belief emerging around this
4 time that what Kingspan had tested was not necessarily
5 representative of what was actually being used in the
6 market, and also that Kingspan had not been particularly
7 clear in its literature about the system it had tested
8 for BS8414:1. I recall the K15 specification
9 literature, which from memory did not make prominent the
10 system details which Kingspan had tested to."

11 Now, is it at that point in time that we can trace
12 your understanding that Kingspan's K15 had passed
13 a BS 8414 test with one kind of rig, but was being used
14 in a much wider series or set of applications?

15 A. I think that's what we're beginning to -- what I was
16 beginning to understand from this document, yes.

17 Q. Did you also take from this document that the Kingspan
18 literature that you had read had the potential to
19 mislead people into believing that Kingspan K15 could be
20 used in systems that had not in fact been tested?

21 A. I remember the K15 specification literature. It wasn't
22 very easy to see the system that had been tested.

23 Q. As you say in your statement, did you also -- I'm going
24 to press you on the question I asked you -- think that
25 the Kingspan literature had the potential to mislead

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1 people into believing that K15 could be used in systems
2 which hadn't actually undergone the BS 8414 test that
3 had passed?

4 A. On the basis that it was difficult to see the system
5 that Kingspan had tested, then yes.

6 Q. Yes.

7 Were you not concerned that Kingspan had not managed
8 to achieve a pass with a system that was representative,
9 given the potential similarities between FR5000, as it
10 was, and Kingspan K15?

11 A. I think at the time when you -- thinking about Kingspan
12 as the business that they were, the size of the
13 business, it made me think there must have been other
14 ways that they were able to get the product certified or
15 allowed to be used on buildings.

16 Q. Were you curious to know how they'd done it?

17 A. At the time I would have been curious, yes.

18 Q. Well, I'm talking about at the time.

19 A. Yes.

20 Q. Now, it's right, I think, that Mr Roper subsequently
21 sent you a project plan and business case. Do you
22 remember that, ever seeing one?

23 A. I remember seeing one, reviewing my documents, and it
24 would have been a standard part of our product
25 development to have put together a business case.

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1 Q. {CEL00001858}, please. This is his business case, as
 2 you can see from the bottom right-hand corner, and if
 3 you go to the first page under "JR" it says, "Project
 4 definition", and the date is on the right-hand side,
 5 7 June 2013, so this is before the Sotech meeting:
 6 "Objective: To develop and launch AE5000 suitable
 7 for rainscreen cladding applications, fire tested in
 8 accordance with BS 8414 for use above 18m."
 9 Now, AE5000, what does AE stand for?
 10 A. It was a working title for the project which would have
 11 stood for "above eighteen".
 12 Q. So not RS at that stage?
 13 A. No, we made a decision to change it to rainscreen or
 14 RS5000 at a later date.
 15 Q. When was that?
 16 A. I don't recall exactly when.
 17 Q. Right.
 18 Under "Market information" and "Current Position" in
 19 the next block down, it says in the last sentence:
 20 "One of the main product gaps against phenolic is
 21 for use in buildings above 18m in height."
 22 It seems from this that competition with phenolic
 23 was the main driver for why Celotex felt it needed to
 24 develop a product for use above 18 metres; is that
 25 right?

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1 A. Yes, it was one of the main drivers of the --
 2 Q. Yes, and in the next block down, in the last two
 3 sentences, it says:
 4 "Phenolic products primarily K15 make up 450,000 m2
 5 of overall annual opportunity. This equates to a market
 6 value for rigid board insulation into ventilated façade
 7 applications of £5.5M."
 8 Now, you say in your statement, just looking at
 9 that -- and this is paragraph 44 on page 12
 10 {CEL00010058/12}, there is no need to go to it -- that
 11 the above-18-metre project was just one of many projects
 12 that the marketing department was involved with during
 13 2013 and 2014.
 14 Is it fair to say that it was a particularly
 15 important project at that time?
 16 A. It was an important project, yes.
 17 Q. Because it was addressing one of your main market gaps
 18 against one of your main competitors?
 19 A. Yes.
 20 Q. Under the next block, "Routes To Market":
 21 "Push/Pull strategy applies. Primary market of
 22 specifiers, architects and rainscreen specific
 23 contractors. Secondary market of specialist
 24 distributors."
 25 Did the marketing strategy rely in part on getting

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1 distributors to push AE5000, as it was then called?
 2 A. The main purpose of the push/pull strategy was for us to
 3 generate demand for products through specifiers and
 4 architects, and the role of the distributor was to
 5 service those requests, which was the opposite, really,
 6 of the general 4000 Celotex range. The opposite
 7 applied.
 8 Q. Right. I rather got the opposite impression: that it
 9 would be the architects and professionals who would be
 10 pulling it in by demand, and distributors, who were
 11 basically at the end of the sales chain, would be
 12 pushing it out. Is that wrong?
 13 A. The push/pull strategy, I never quite understood the
 14 terminology there, but essentially what that means is
 15 it's about getting specifiers, architects, et cetera, to
 16 put the product into drawings and planning proposals --
 17 design proposals, sorry, at an early stage, and
 18 therefore the distributor really then just services the
 19 demand for the product through the insulation
 20 manufacturer.
 21 Q. All right. So to summarise your understanding of this,
 22 the principal route to market was specifiers, architects
 23 and rainscreen-specific contractors? In other words,
 24 end users.
 25 A. I wouldn't say they were end users. We weren't have

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1 termed an architect as an end user.
 2 Q. Would you not?
 3 A. No, I would have said they were designers, specifiers.
 4 Q. All right. Let me try this one: people making the
 5 ultimate decisions on what insulation products to use
 6 above 18 metres?
 7 A. Yes.
 8 Q. Right.
 9 If we go to page 2 {CEL00001858/2} under
 10 "Testing/Approvals", we can see at the top of the page
 11 there that the report says:
 12 "Above 18m approval in accordance with both
 13 BS 8414-1 & BS 8414-2. BBA approval in Year 2 or 3 if
 14 Kingspan's attack starts to affect level of business."
 15 What did you mean or what did you understand there
 16 was meant by "Kingspan's attack"?
 17 A. "Kingspan's attack" there would have meant a reaction to
 18 the fact that an application that they have almost
 19 entirely to themselves for rigid foam is starting to
 20 have other manufacturers competing with them.
 21 Q. I see. So did you expect them to retaliate in response
 22 to your proposed launch of RS5000, as it became?
 23 A. I don't really recall thinking too much about that,
 24 other than knowing what Kingspan -- how Kingspan had
 25 generally reacted to other products that we'd launched

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1 into that kind of specification space that they were in.
 2 Q. Do we take from this that the proposal at least that
 3 Jon Roper was putting forward to you was that there
 4 would be no need to go and get BBA approval for RS5000
 5 until one or two years, maybe three years in to see
 6 whether Kingspan effectively retaliated?
 7 A. Perhaps, or it might be worded -- just reading it there,
 8 sorry -- is that the fact that Kingspan had
 9 a BBA certificate, they might use that as
 10 a counterattack against Celotex.
 11 Q. Well, it says "BBA approval in Year 2 or 3", that would
 12 be Celotex acquiring BBA approval?
 13 A. Yes.
 14 Q. If "Kingspan's attack starts to affect level of
 15 business", and the way I read that -- correct me if I'm
 16 wrong -- is that you would only get BBA approval in
 17 those years depending upon whether Kingspan's attack, as
 18 you called it, its reaction, started to affect the level
 19 of RS5000 business?
 20 A. Yes.
 21 Q. And in the meantime, you wouldn't need to go and get
 22 a BBA approval?
 23 A. I don't believe BBA approval was seen as necessary for
 24 launch, no.
 25 Q. No.

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1 Then under "Installation Requirements", it says:
 2 "No change from existing FR5000 rainscreen cladding
 3 application details. Report showing permutations of
 4 fire test will be available."
 5 Is that because the FR5000 rainscreen cladding, as
 6 it were, was the same as RS5000; in other words,
 7 installation requirements wouldn't need to change
 8 because the product was the same?
 9 A. No, I think it's because the application is the same,
 10 in -- whether it's below 18 metres, which is the --
 11 Celotex would have been supplying into the
 12 below-18-metre rainscreen cladding market. I don't
 13 think the application guidelines would have changed
 14 depending if it went above 18 metres.
 15 Q. Yes, I understand.
 16 Further down the page it says, under "Product
 17 Positions & USPs", in the final sentence there:
 18 "Easier specification solution and 15% more cost
 19 effective than Kingspan."
 20 What did "Easier specification solution" mean to
 21 you?
 22 A. I don't know, actually.
 23 Q. Did it mean a wider range of applications than K15?
 24 A. No, I don't believe so.
 25 Q. Was it anything to do with lambdas, with the U-values?

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1 A. No, I don't recall what -- I don't ever remember seeing
 2 "Easier specification solution" used anywhere else when
 3 we were launching the RS5000 range.
 4 Q. Going back to "Installation Requirements", in the light
 5 of that, it says "Report showing permutations of
 6 fire test will be available" in the second sentence
 7 there. Was your plan at this point to get a field of
 8 application report? Is that what the report --
 9 A. I don't know whether that was at this stage. I can't
 10 remember the timeline of -- I can't remember when this
 11 document was dated and how that relates to the other
 12 timings of when we were working --
 13 Q. Right. What did you understand "Report showing
 14 permutations of fire test" to mean?
 15 A. Sitting here today, sorry, I don't know.
 16 Q. Okay.
 17 Then going back down to the "Product Positions &
 18 USPs" section, looking at the second and third
 19 sentences, you see it says:
 20 "Over 100% more thermally efficient than mineral
 21 fibre insulation materials. Better U-values and thinner
 22 solutions."
 23 Is that a reference to the U-values being better
 24 than phenolic and therefore less of it being required on
 25 the exterior of a building?

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1 A. I think it's more linked to the mineral fibre, because
 2 Celotex had a worse lambda value than Kingspan, so we
 3 wouldn't have been able to say better U-values.
 4 Q. I see.
 5 Now, can I just ask you some questions about IFC.
 6 A. Yes.
 7 Q. Can we go to {CEL00002743}, please. These are
 8 handwritten notes of a meeting between IFC and Celotex
 9 dated 22 July 2013.
 10 Now, we understand that Rob Warren was the author of
 11 these notes, but that you were present at the meeting.
 12 Do you remember this meeting?
 13 A. I remember being at one meeting with IFC, yes.
 14 Q. And do you think this was it, 22 July 2013? Would the
 15 date ring a bell with you?
 16 A. The date doesn't ring a bell. The name Peter Jackman
 17 does. The name Parina Patel does as well. But
 18 I thought when I met with Peter it was just Peter from
 19 IFC, but I can't be 100% certain.
 20 Q. If we look at the top of the page, we can see that the
 21 title of the meeting is "Above 18m test", and we can see
 22 that Peter Jackman and Parina Patel were there, and
 23 they're telling you a little bit about IFC, it seems.
 24 Then there is a heading, "Fire Safety Act 2005,
 25 Regulatory Reform Order", and then a little bit lower

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1 down than that, you can see it says:
 2 "ADB - guidance only. Can be 'interpreted' if you
 3 know what you are talking about."
 4 Do you recall that being said, or words to that
 5 effect?
 6 A. No.
 7 Q. You don't know who might have said that ADB was capable
 8 of being "interpreted"?
 9 A. No, I wouldn't recall.
 10 Q. Was there any discussion in general terms that you
 11 recall about ADB being understood in a particular way
 12 that could be ambiguous or that the guidance could be
 13 circumvented in some way?
 14 A. No, not that I recall, no.
 15 Q. Or that it was soft guidance?
 16 A. No.
 17 Q. Further down on the right-hand side you can see, just
 18 a little bit down, it says, "FR5000 rename". Do you
 19 remember whether it was you or Rob Warren who said that?
 20 A. I don't know. I don't know whether this was the meeting
 21 with IFC that I was at, so I can't say it was me.
 22 Q. Right, you can't help?
 23 A. No.
 24 Q. It is right, though, isn't it, that FR5000 was going to
 25 be renamed, and ended up having the brand name RS5000?

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1 A. Yes.
 2 Q. It's quite clear that it was never going to be a new
 3 product.
 4 A. No.
 5 Q. No.
 6 Now, let's go to {CEL0000670}. This is an email
 7 from you to Joe Mahoney, copied to Jonathan Roper, on
 8 27 August 2013, as we can see there, and it says:
 9 " Still awaiting green light from fire consultant
 10 that the FR range will have a good chance of passing the
 11 test. What we have paid the £1000 so far for.
 12 "Once we have this confirmation we will begin
 13 designing the test rig and overall system and book the
 14 rig with BRE. At this point we will need to pay for the
 15 main test. Best estimate as it sits today is this will
 16 be an October spend with test sometime in November.
 17 "Jon will provide more detail when he returns from
 18 holidays w/c 9th September."
 19 Now, that was the ambition at that stage, and you
 20 were going to Joe Mahoney because he held the purse
 21 strings for the budget for the test; is that right?
 22 A. Yes, Joe Mahoney held the budget for all UK and product
 23 approvals and testing.
 24 Q. Right.
 25 Now, do you remember, just moving forward a little

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1 bit further into the year, that in early October
 2 Jonathan Roper and Jamie Hayes attended a meeting with
 3 IFC and Sotech?
 4 A. From what I've reviewed as part of my statement, then,
 5 yes, I recall.
 6 Q. But you have no independent recollection of that, being
 7 told about it?
 8 A. I do remember them going to that meeting, yes.
 9 Q. Let's see the note of the meeting. It's {CEL00001194},
 10 please. This is an email from Jamie Hayes to Rob Warren
 11 and you, attaching the note of the summary of their
 12 meeting with Sotech on Thursday, that was the week
 13 before. This email is 7 October, the meeting was on the
 14 3rd.
 15 So you did definitely see this note, looking at this
 16 email.
 17 A. Yes, I believe so.
 18 Q. Yes. Let's look at the note. It's at {CEL00001195}.
 19 This is Jon Roper's note of the meeting, and it's
 20 entitled:
 21 "Above 18 metres fire test."
 22 "IFC and Sotech Meeting, Peterlee 03.10.2013 -
 23 Summary.
 24 "Present:
 25 "John Egginton - Sotech.

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1 "David Cooper - IFC.
 2 "Jon Roper - Celotex.
 3 "Jamie Hayes - Celotex."
 4 You can see that the first bullet point down under
 5 "Fire test" is:
 6 "Very problematic to pass - Kingspan failed twice
 7 with standard cavity barriers."
 8 Then you look a little bit lower down and it says:
 9 " John at Sotech sceptical about pass with
 10 decorative cladding.
 11 " Still no idea how Kingspan support the use of
 12 decorative cladding as their fire test uses a
 13 non combustible cladding.
 14 " Very unlikely to pass on the basis that Celotex
 15 FR5000 is slightly better than Phenolic (according to
 16 IFC testing).
 17 " Possible idea to design 'double cavity fire
 18 barrier "'
 19 Just looking at that, first, what did you
 20 understand, when you read this note, was meant by
 21 a "decorative cladding panel"?
 22 A. I don't believe I would have known what a decorative
 23 cladding panel was.
 24 Q. Right.
 25 A. It's not a term I've -- I'd heard or have heard since,

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1 decorative.
 2 Q. Right.
 3 Looking at this note and the parts that I've read to
 4 you, overall the impression that it gives is that this
 5 was not very encouraging feedback for the prospects of
 6 FR5000 passing a BS 8414 test; is that fair?
 7 A. Yes.
 8 Q. And also raising the question about how it could be that
 9 Kingspan had passed an 8414 test for K15; yes?
 10 A. Yes, based on the first bullet, yes.
 11 Q. Based on the first bullet, and also a question about how
 12 Kingspan could support the use of decorative cladding
 13 given that the test that they did pass used
 14 a non-combustible cladding; is that also a fair --
 15 A. Sorry, can you say that again?
 16 Q. Yes, that the note told you that those at the meeting
 17 were still puzzled as to how Kingspan could advertise or
 18 push K15 for use with a decorative cladding in
 19 a cladding system, given that the fire test had used
 20 a non-combustible cladding?
 21 A. Yes.
 22 Q. Yes. So discouraging and two mysteries about Kingspan,
 23 would be the summary; is that fair?
 24 A. Yes, as part of the general scoping of the market and
 25 the research that Jon was doing with Jamie's support,

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1 yes.
 2 Q. Yes.
 3 Now, can we go to your witness statement, please, at
 4 page 21 {CEL00010058/21}, paragraph 71. I would like to
 5 look at the whole paragraph with you:
 6 "I do not now recall reading this note or my
 7 reaction to it at the time, and I do not know which of
 8 the attendees at this meeting would have made each of
 9 the comments noted above (save where the comment makes
 10 it clear). As I noted at paragraph 60 above, I believe
 11 I appreciated at that time and indeed before receiving
 12 this note, that not all systems incorporating FR5000
 13 were likely to pass BS8414. At this stage we were still
 14 trying to gather as much information as possible so that
 15 a decision could be taken by the business on whether to
 16 proceed with a test, and if so, with what system.
 17 I also think the fact that a system incorporating K15
 18 had passed this test and was being regularly specified
 19 apparently without negative feedback within the market
 20 encouraged me that our goal was achievable. By this
 21 I mean nothing negative was being fed to us by our
 22 customers or members of our sales teams. As K15 was our
 23 benchmark and so far as I was concerned there was very
 24 little product to product difference this gave me
 25 confidence PIR could be a viable market solution."

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1 Now, I show you that. I have some questions about
 2 that.
 3 You have already agreed that the K15 test, which you
 4 understood used a cement particle board, was wholly
 5 unrepresentative of what was actually used in the
 6 market. That's right, isn't it?
 7 A. Sorry, when did I say that?
 8 Q. Let me try it a different way.
 9 Do you agree that the K15 test, which you could see
 10 from the note had used a cement particle board, was
 11 highly unrepresentative of a board or panel for
 12 rainscreen that was being used in the market?
 13 A. I wouldn't know it was wholly unrepresentative on the
 14 basis that there was other -- I knew that things like
 15 field of application might be able to interpret data,
 16 and I wasn't really looking at that particular cladding
 17 type.
 18 Q. Well, let me try it a different way.
 19 In your experience thus far -- this is late 2013 --
 20 had you come across any cladding systems which had used
 21 cement particle board as the rainscreen?
 22 A. No, but I wouldn't also be aware of what other types of
 23 cladding system were available either.
 24 Q. No, but never mind about that. I'm just asking you to
 25 address my specific question, which is: given that

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1 Kingspan used a cement particle board as the rainscreen
 2 panel in their BS 8414 test, did it not strike you at
 3 the time that the use of that material as a rainscreen
 4 panel was completely unrepresentative of the norm for
 5 rainscreen systems?
 6 A. Yes, I would say it seems, based on the information that
 7 was provided, that it was not common.
 8 Q. No, and as a product manager, you must have had some
 9 idea about what was common in the market.
 10 A. No, because in my role in -- as product manager, I got
 11 very, very little -- didn't get involved at all with
 12 rainscreen cladding as an application.
 13 Q. At all events, you didn't want to use a cement particle
 14 board in your test; is that right?
 15 A. Certainly throughout this timeframe of the market being
 16 scoped, I didn't want to do what Kingspan were looking
 17 like they were doing.
 18 Q. And why was that?
 19 A. I wanted us to be -- to have a more credible solution.
 20 Q. More credible in what way?
 21 A. That the -- to use those words, more representative.
 22 Q. More representative?
 23 A. Or a more typical rainscreen cladding panel.
 24 Q. Yes. So not cement particle board, but something that
 25 would be more often used by people who built rainscreen

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1 systems?
 2 A. Yes.
 3 Q. Yes.
 4 Now, this note of the meeting I've shown you with
 5 Sotech and IFC explicitly told you that the prospects of
 6 passing the test using a decorative panel were not good.
 7 By decorative panel, Mr Roper told us yesterday that
 8 that meant something -- and I'm paraphrasing his
 9 evidence -- that looked nice on the outside.
 10 A. Right.
 11 Q. He expressly excluded from that a Marley Eternit Natura
 12 panel, which he said was a decorative panel of sorts.
 13 Did you understand what was meant by decorative?
 14 A. No.
 15 Q. Did you ask?
 16 A. No.
 17 Q. This note -- and we can go back to it if need be -- also
 18 informed you that some form of enhanced cavity barrier
 19 would be necessary in order for a system using
 20 a decorative panel to pass. Do you remember that? We
 21 can go back to it if you like.
 22 A. I remember seeing it a second ago, yes.
 23 Q. Yes. In the light of that, why were you at all
 24 encouraged that the goal was achievable, as you say?
 25 A. At the time, and based on what I can recall at the time,

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1 our benchmark was the K15 product, therefore there must
 2 have been ways in which that product was allowed to be
 3 specified and installed on buildings.
 4 Q. But what you were told was that K15 had passed a test
 5 and was therefore being used only because it had passed
 6 a test using a cement particle board as a rainscreen
 7 cladding, and you said that that wasn't representative
 8 and you wanted to be more representative.
 9 My question is: what was the source or basis of your
 10 optimism, given that you wanted to be more
 11 representative of the market than Kingspan?
 12 A. I don't recall, sorry.
 13 Q. I'm trying to get to the bottom of your reasoning here
 14 in paragraph 71. On what basis did you think that
 15 a BS 8414 test of RS5000, as it became, was likely to be
 16 successful, given that Kingspan had only passed that
 17 test using an unrepresentative cladding?
 18 (Pause)
 19 A. Sorry, I don't --
 20 Q. Right.
 21 A. I don't know. I can't recall my thinking at the time.
 22 Q. Well, you have done enough in your paragraph 71 to tell
 23 us about what your thinking was at the time, but now
 24 you're not, sitting there, able to explain --
 25 A. My thinking at the time was that the K15 product was on

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1 the market and therefore there must be other ways in
 2 which the product would be allowed to be used.
 3 Q. But you didn't know what those were?
 4 A. No.
 5 Q. And so far as you could see --
 6 A. No, this is generally where it was part of a market
 7 scoping and understanding exercise.
 8 Q. So when you say:
 9 "I also think the fact that a system incorporating
 10 K15 had passed this test and was regularly being
 11 specified apparently without negative feedback within
 12 the market encouraged me that our goal was achievable."
 13 Do you really mean there that the fact that K15 had
 14 somehow got away with it meant that you would also be
 15 able to get away with it? Was that your thinking?
 16 A. I wouldn't say get away with it. The product was being
 17 used, and my thinking at the time was, certainly at
 18 a product level: why can Kingspan's K15 be used and
 19 Celotex's FR or RS5000 product, which has very similar
 20 properties, can't be used?
 21 Q. And the fact that you had had no answer to that question
 22 led you to be encouraged that you might be able to
 23 launch FR5000 as an above-18-metre product?
 24 A. I think it was more based on getting feedback from the
 25 market as well.

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1 Q. Did you think at the time that a test of a cladding
 2 system incorporating any cladding panels other than
 3 a cement particle board would have any chance of
 4 succeeding?
 5 A. Sorry, can you repeat that question?
 6 Q. Yes. Did you think at the time that a BS 8414 test of
 7 a cladding system incorporating any cladding panels
 8 other than a cement particle board, as K15 had done,
 9 would have any chance of succeeding?
 10 A. I don't recall what other cladding panels were being
 11 talked about or thought about.
 12 Q. Well, you can see from the Sotech meeting note that
 13 decorative panels were being discounted, so that marked
 14 them out. You didn't want to go the cement particle
 15 route because it wasn't representative. What was the
 16 basis for your being optimistic that if you were going
 17 to sell RS5000, as it became, for use with
 18 a representative system or range of systems, RS5000
 19 would pass such a test?
 20 A. Only the fact that K15 was being used as well.
 21 Q. But you didn't know how.
 22 A. No.
 23 Q. Can we move on. Let's go to {CEL00000716}. This is
 24 a long email which Jon Roper sent to you on
 25 1 November 2013, and as I did with him, I would like to

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1 spend a little bit of time with you on this document.
 2 We know you received it because you responded, and
 3 I will show you your response shortly.
 4 Are you familiar with this document?
 5 A. I'm familiar with it since it being presented to me.
 6 Q. Well, were you familiar with it at the time, having
 7 reviewed it?
 8 A. Again, having reviewed it as part of this process, I can
 9 see that I was on holiday at the time, so when
 10 I replied, I replied relatively quickly to Jon from when
 11 he sent it to me. So I would have read it, but
 12 I wouldn't have given it a huge amount of time.
 13 Q. All right. Let's go to page 2 {CEL00000716/2} to see
 14 what it was that gave rise to his email to you of
 15 1 November. There's an email trail, as always with
 16 these things --
 17 A. Yes.
 18 Q. -- which starts at the bottom of page 2 with
 19 a discussion about a TP branch. Is that
 20 a Travis Perkins branch?
 21 A. Yes.
 22 Q. Moving up the page, a third of the way down, 31 October,
 23 he emails you:
 24 "Standard TP margin would usually be 25%."
 25 Then:

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1 "P.s need a catch up on above 18m when back. Will
 2 send an invite to you, RW, CC & JH for an update on
 3 project. In a position where decisions need to be made.
 4 "Catch up Monday.
 5 "Enjoy the rest of your week off."
 6 Now, RW is Rob Warren, CC is Craig Chambers and JH
 7 is Jamie Hayes in that list, isn't it? Yes?
 8 A. Yes.
 9 Q. So you could see from that that at least Craig Chambers
 10 was involved or was proposed to be involved for
 11 an update; is that right?
 12 A. Yes.
 13 Q. Then you go back to him, same day:
 14 "Thanks. Decent margin ...
 15 "Seen the invite for Monday so good to get that
 16 discussion going and agree way forward. Is it good
 17 news?!!"
 18 That's the question to which he responds. Let's
 19 turn the page.
 20 A. Yes.
 21 Q. He starts, "Well ..."
 22 So you can see from that little introduction that it
 23 wasn't good news, and he goes on to explain in great
 24 detail, with great thoroughness, what he had found.
 25 Now, I know you have read this email recently as

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1 part of preparations to give evidence, so I'm going to
 2 assume you're familiar with it, so I'll take it as
 3 quickly as I can. But he says that there are:
 4 "... two possible solutions for testing in which
 5 both David @ IFC and I have confidence in."
 6 Do you see that?
 7 A. Yes.
 8 Q. He goes on to explain what those are.
 9 He says in the second paragraph that, after much
 10 research, he doesn't think that testing worst-case
 11 scenario with an improved fire barrier, which is what he
 12 is talking about, is possible, "and I don't believe
 13 [Kingspan] have a similar report", and that report
 14 there -- and I'm summarising, probably a little bit
 15 disjointedly, the fact that he is discounting a field of
 16 application report.
 17 Is that how you read it?
 18 A. Yes, on the basis of the assessment report which he
 19 references in paragraph 1.
 20 Q. Yes, and then he goes on to say:
 21 "We cannot seem to find or design a suitable barrier
 22 in which we have enough confidence that it can be used
 23 behind a standard ACM panel which we know will melt and
 24 allow fire into the cavity."
 25 Pausing there, he told us that he got that

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1 information from Sotech, because they told him that,
 2 essentially, in the June of 2013.
 3 But he is assuming that you know what an ACM panel
 4 is. Did you know at that stage what an ACM panel was?
 5 A. I don't believe so, no, not in terms of what it meant.
 6 Q. We don't see you going back to him and saying, "Sorry,
 7 Jon, what's an ACM panel?", do we?
 8 A. No. What I did do is -- on the basis that this seems to
 9 be the conclusion of his months of market scoping is why
 10 I'm then suggesting that he gets this meeting together
 11 with the managing director, myself and really the two
 12 main technical people in the business.
 13 Q. Yes. My question really is: when he mentioned standard
 14 ACM panel, did you know what he was talking about?
 15 A. I can't recall at the time whether I'd have known
 16 exactly what a standard ACM panel meant, no.
 17 Q. He goes on:
 18 "Speaking to SIMCO on Wednesday in [Birmingham] with
 19 IL ..."
 20 That's Ian Lathbury.
 21 A. Yes.
 22 Q. "... he confirmed that architects will specify K15 with
 23 a standard fire barrier and panel. When the work is
 24 contracted and then sub-contracted to cladding
 25 contractors such as Simco, H A Marks, Stanmore etc, they

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1 value engineer that system to be competitive at tender.
2 This means changing fire barriers, changing panels. The
3 architect's only guarantee is that K15 will be used
4 because there is no other alternative available."

5 Now, just pausing there, was he telling you
6 something you already knew or were you educated by his
7 findings here?

8 A. I think I was being educated.

9 Q. Right.

10 Just pausing there, you were aware from that,
11 I think, weren't you, that even before any testing had
12 been carried out, FR5000, or RS5000 as it became,
13 couldn't be used in conjunction with ACM?

14 A. I don't know whether I -- well, based on what I'd been
15 told in previous reports that Jon had put together, then
16 yes.

17 Q. Yes, fine.

18 He then goes on:

19 "An architect will be told that K15 is applicable
20 for above 18m in accordance with ADB and that suffices
21 from their perspective. Kingspan have done a great job
22 at the spec end and according to Simco are specified
23 much more than Rockwool Duo Slab for thermal
24 performance. As discussed above, contractors opt for
25 more cost effective solutions and although they are

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

15 Now, that's an important paragraph.

16 Did you understand him to be saying that contractors
17 didn't have enough knowledge to challenge the
18 inappropriate use of insulation products above
19 18 metres?

20 A. I don't believe I had enough knowledge of the
21 contractors in that market to know whether they knew
22 that or not. I think our understanding in Celotex was
23 that contractors would have suitable knowledge of
24 different cladding materials.

25 Q. Well, Mr Roper is reporting back to you the products of

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1 his labour, and this is what he has found out. I'm
2 asking you about what you understood from this email.

3 Did you understand him to be telling you that
4 contractors did not have enough knowledge of the
5 guidance to challenge the inappropriate use of products
6 above 18 metres? That's what it appears to be telling
7 you.

8 A. At the time I wouldn't have given it that level of
9 thought because, as I said, I read this and replied to
10 him, I believe, within half an hour of him sending this
11 email at a time when I was on holiday. So I don't
12 believe I would have been giving it that level of detail
13 or attention.

14 Q. Did you not pick up from this paragraph that Mr Roper
15 was telling you that Kingspan had been able to market
16 Kooltherm K15 by getting a BBA certification, getting
17 an LABC registration and then using that to get past
18 building control officers without challenge? That was
19 the route. Did you not pick that up from --

20 A. As I said, I don't think I picked any of the main
21 detail, other than just to say to Jon that it looks like
22 he's scoped his understanding and to get a meeting
23 together of people on when I'm back.

24 Q. Right. It sounds as if me asking you questions about
25 this document may be of diminishing returns, but let's

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1 see how we go.

2 He goes on:

3 "What does all this mean for us? System approval
4 limits us hugely as the market is so fragmented and it's
5 extremely difficult to grasp who is being most commonly
6 used. The likes of Marley, Alucobond & Trespa are
7 spec'd a lot but value engineered out for standard
8 aluminium panels."

9 Pausing there, what he was telling you there, was
10 that news to you or was that something you already knew?

11 A. I think a lot of this is -- reading it again, a lot of
12 this is news to me.

13 Q. Is news to you, but was news to you at the time?

14 A. I don't recall what I was thinking at the time.

15 Q. "Trying to do the right thing requires a complete
16 re-education of the [market] and this would require
17 a huge campaign and probably a lawsuit. Two options
18 proposed below."

19 Then he sets them out:

20 "1. Test a standard A2 limited combustible panel of
21 which there are a few (Alucobond A2, Marley Eternit)
22 with a standard fire barrier system. If challenged on
23 what system to use, we can happily state that our test
24 used an A2 panel with a particular commonly used fire
25 barrier. Still not 100% confident in passing as A2 is a

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1 euroclass classification derived from test data on
 2 reaction to fire testing.”
 3 Just pausing there, that was an option which would
 4 at least be testing a panel which was standard in the
 5 market, yes, a commonly used panel?
 6 A. It sounds like it, yes.
 7 Q. Right. But the problem with that is that, because it
 8 was A2, it was a Euroclass definition and therefore not
 9 the same as the UK limited combustibility or surface
 10 spread of flame panels classifications .
 11 Then the second option was:
 12 ”2. Opt for the [Kingspan] route and put a cement
 13 particle board as the cladding. Use a standard fire
 14 barrier. Good chance of passing knowing they have and
 15 cp board is good in terms of resistance to fire.”
 16 Now, did you read both of those options as
 17 an alternative to doing the right thing?
 18 A. No, I don't believe so.
 19 Q. You see, he said, ”Trying to do the right thing requires
 20 a complete re-education of the market and this would
 21 require a huge campaign and probably a lawsuit”, but
 22 neither of those are the options that he then sets out.
 23 A. I think what he is saying there, based on the report
 24 that he has put in before, is about what Kingspan are
 25 doing, and I think he's then saying that the market is

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1 at a place of where Kingspan has taken the education of
 2 that market and us challenging it would ... yeah, would
 3 be, you know, a potentially difficult exercise.
 4 Q. A potentially difficult exercise, re-education, and
 5 a potential lawsuit.
 6 Did you agree with him that re-educating the market
 7 would require a huge campaign and probably a lawsuit, at
 8 the suit of Kingspan, as he told us yesterday?
 9 A. I think there's every chance that, yes, that would have
 10 happened.
 11 Q. So given that trying to do the right thing was almost
 12 impossible, the only options here were those he set out:
 13 either a test with an A2 panel with the downsides that
 14 involved, or going the Kingspan route. That's what he
 15 is saying; is that how you saw it?
 16 A. That's how it -- yes, that's how it looks there.
 17 Q. Then he goes on to say after those options:
 18 ”However, what we do need to consider is if we have
 19 two potential systems that could pass, how do these
 20 dictate route to market. What does an ASM/CTC state to
 21 somebody who enquires?”
 22 Those are groups within Celotex, aren't they? Area
 23 sales --
 24 A. Yes, area sales and Celotex technical team.
 25 Q. ”If we simply have the test report, we don't want to

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1 have to provide this as evidence.”
 2 Then he asks this series of questions:
 3 ”Do we in fact need to spend £25k/£30k for BBA to be
 4 able to gain this document from LABC which in my mind
 5 gives us very little chance of being challenged from
 6 building control. Do we partner with a few fire barrier
 7 manufacturers who have tested with K15 currently to gain
 8 confidence in the [market] that way? Or do we take the
 9 view that our product realistically shouldn't be used
 10 behind most cladding panels because in the event of
 11 a fire it would burn?”
 12 Now, those are three rhetorical questions.
 13 In your mind at the time, did you have an answer to
 14 them, or any of them?
 15 A. No.
 16 Q. Did you ever come to address your mind to those
 17 questions so as to give yourself an answer to them?
 18 A. Well, I think the fact that there's some major questions
 19 there that need to be asked would be the main reason why
 20 my response was to put a meeting together to talk this
 21 through.
 22 Q. He then goes on:
 23 ”What [Kingspan] have done extremely well is say
 24 very little but build confidence if challenged by having
 25 fire barrier manufacturers showing tests with K15,

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1 achieve BBA validation and subsequently gain LABC
 2 approval. There is always the chance they do have the
 3 piece of paper in the top drawer from somebody that
 4 states for use with any system but I doubt it.”
 5 Now, in reality, what he is telling you is that you
 6 either have to play in this market which has been skewed
 7 by K15, or not enter the above-18-metre market at all.
 8 That is a blunt summary of what he is telling you, isn't
 9 it?
 10 A. Yes.
 11 Q. And you knew that at the time; yes?
 12 A. I knew the market was a different and challenging market
 13 for us, which is why I wanted to get the meeting
 14 together to decide what the next steps were.
 15 Q. And it was challenging, by now I think you must have
 16 realised, because Kingspan occupied it almost
 17 exclusively by reason of having some certification
 18 documents based upon a test that nobody could
 19 understand; yes?
 20 A. Yes.
 21 Q. And that you had your strong suspicions about; yes?
 22 A. Yes.
 23 Q. We can see your response, {CEL00000718}, and you say to
 24 him, and it's the same day, about 40 minutes after he
 25 sends it to you:

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1 "Great summary and shows the real merit of good
2 afternoon and talking to the market. We are trying not
3 to create a 'me too' here but if we do it will be for
4 the right reasons."

5 Then you go on to say:

6 "I'd suggest you put the whole 18m story into some
7 slides and spend 15mins at the start bringing everyone
8 up to speed on your work to date. Also have the flip
9 chart there in case you need to draw anything up.

10 "We can then discuss how we go forward."

11 Then you say:

12 "For me, for every amount of confidence we lose in
13 the other system passing needs to be offset with the
14 same amount or more competitive advantage that doing it
15 this way delivers.

16 "I'm not sure we will have that but let's excuse and
17 also get the view of others.

18 "Please also invite Joe or speak to him when he's
19 back on Monday. It's his budget and he should also have
20 a say on whether this happens."

21 I'm assuming that's Joe Mahoney?

22 A. Yes.

23 Q. Just going a little bit out of that document, I want to
24 show you your statement, because you say what you say
25 you meant in it. Page 25 {CEL00010058/25},

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1 paragraph 82. You're referring there to the first part
2 of that email. You say:

3 "In noting 'We are trying not to create a "me too"
4 here but if we do it will be for the right reasons'
5 I meant that, in my mind Celotex should not go down the
6 same testing route as Kingspan - i.e. we should test
7 a system that was more representative of what was
8 actually being used in the market - and also that we
9 should be clearer in our marketing literature about what
10 we had tested."

11 So what were the right reasons?

12 A. I don't know exactly what -- I know what I mean by the
13 "me too" in terms of the replication of Kingspan, but
14 "if we do it will be for the right reasons", I don't
15 recall what we were thinking those reasons were. As
16 I said, I replied to Jon's email very, very quickly.

17 Q. Well, you replied after 40 minutes, and perhaps I'm
18 wrong, but you had at least read and digested what he
19 said before going back to him.

20 A. Well, I was on holiday at the time, so I don't know
21 whether I read it as soon as it came through.

22 Q. Well, you would have read it within the 40 minutes
23 before you responded to him. Do you want to go back and
24 look at the timings?

25 A. Yes.

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1 Q. Okay. Let's go back to the email itself if we can,
2 which is at {CEL00000718}. You can see halfway down
3 page 1 on the screen there that it's sent to you from
4 Jonathan Roper at 9.57 on 1 November, and at the top of
5 the page, you respond to him on the same morning at
6 10.32. So that's 40 minutes almost exactly.

7 So do I take it from that that you had received his
8 email and, allowing for some time for your smartphone to
9 go ping, open it up and look at it, you had at least
10 read it before going back to him?

11 A. Yes, I would have read it. What I'm saying I don't know
12 whether I read it at 10.25 or at 10 o'clock, so in terms
13 of that response.

14 Q. No, it doesn't matter when you read it. My question
15 simply is that having responded to him in the way that
16 you have, you at least took the trouble to read it,
17 digest it and understand it before you responded.
18 That's all I'm putting to you.

19 A. Yes, I'm not sure I digested it and understood it.

20 Q. Did you go back to it later and sit and read it
21 thoroughly?

22 A. I don't know. I think the fact that --

23 Q. All right, we're getting slightly diverted.

24 What I really want to ask you about is: although you
25 have told us in your statement what you meant by "trying

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1 not to create a 'me too' here", you haven't addressed
2 the "if we do it will be for the right reasons", and
3 I want to know what the right reasons were.

4 A. I don't recall what I mean by the right reasons.

5 Q. In the end we know -- and I'm cutting a long story
6 short -- that Celotex neither tested a representative
7 system nor was truthful in its literature about what it
8 actually tested, was it?

9 A. Based on the marketing and the information I had, the
10 detail of the system was what I believed had been
11 tested.

12 Q. Right, well, we'll come to that. So you don't accept
13 what I have just put to you; is that right?

14 A. I don't accept that the knowledge I had at the time that
15 the -- what I knew -- what I believed had been tested
16 was what was written in the marketing literature.

17 Q. Saying that you are trying not to create a "me too"
18 here, did that really involve you rejecting option 2
19 that Mr Roper was putting forward, namely opt for the
20 Kingspan route and put a cement particle board as the
21 cladding?

22 A. I think what I'm just saying there is, if we can, we
23 don't want to try and replicate how Kingspan have done
24 it.

25 Q. Right.

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1 Then you say, as I've shown you in the third
2 paragraph:
3 "... for every amount of confidence we lose in the
4 other system passing needs to be offset with the same
5 amount or more competitive advantage that doing it this
6 way delivers."

7 What does "the other system passing" mean? Does
8 that mean the K15 system, or what system?

9 A. Yeah, as I've said in my statement, I don't know what
10 I mean by those sets of words.

11 Q. Right.

12 Does this mean that even if you were less confident
13 that the system that you were going to test would pass,
14 you would need to have equal and opposite confidence
15 that you would gain a competitive advantage if it did?

16 A. As I said, I don't -- sitting here and having reflected
17 on them, even when I was putting my statement together,
18 I don't understand or know what I meant by that
19 statement.

20 Q. Right.

21 In a nutshell, were you trying to say -- and I'll
22 just have one more go here -- that it was only worth
23 avoiding the Kingspan route if there was sufficient
24 competitive advantage to doing so?

25 A. I don't know. I don't --

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1 Q. You don't know, all right.

2 A. I'm sorry, I don't know.

3 Q. All right.

4 Now, there was then a decision to test, and you say
5 in your statement that decision was taken in late 2013,
6 that's paragraph 77 {CEL00010058/22}. You say that that
7 decision was taken at a meeting on 4 November 2013 at
8 which Mr Roper, Mr Hayes, Mr Warren and Mr Chambers were
9 present. That's what you say. Do you remember that?

10 A. Yes.

11 Q. The decision to have that meeting was made following the
12 email that we have just been looking at, the email
13 exchange I have just been showing you; yes?

14 A. Yes, that's what I've asked Jon to do, set the meeting
15 up and --

16 MR MILLETT: I'm going to show you some slides for that
17 meeting.

18 Mr Chairman, is that a convenient moment for the
19 afternoon break?

20 SIR MARTIN MOORE-BICK: I was just thinking it might be,
21 yes.

22 We will take a break at this point, Mr Evans. We
23 will come back at 3.35, please. Again, while you're out
24 of the room, please don't talk to anyone about your
25 evidence or anything to do with it. All right?

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1 Would you like to go with the usher, then, please.

2 THE WITNESS: Thank you.

3 (Pause)

4 SIR MARTIN MOORE-BICK: Good, thank you.

5 3.35, thank you.

6 (3.18 pm)

7 (A short break)

8 (3.35 pm)

9 SIR MARTIN MOORE-BICK: Right, ready to carry on?

10 THE WITNESS: I am, thank you.

11 SIR MARTIN MOORE-BICK: Thank you.

12 Yes, Mr Millett.

13 MR MILLETT: Thank you, Mr Chairman.

14 Mr Evans, can I ask you to look, please, at
15 {CEL00011199}. These are the slides that you asked
16 Mr Roper to produce for the 4 November meeting, are they
17 not?

18 A. Yes.

19 Q. Can we look at slide 14, please, on page 14
20 {CEL00011199/14}. This set out five options, "Celotex
21 Options", and you can see them there.

22 Are these the alternative routes that you considered
23 that Celotex might follow?

24 A. I think they're the -- yes, they're the options from the
25 meeting based on Jon's research.

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1 Q. The first is:

2 "Worst Case Scenario With Field Of Application
3 Report."

4 What did you understand he meant by worst-case
5 scenario?

6 A. I think -- not a great set of words, but I think what
7 he's saying there is to test to a -- test as a set of --
8 like a system, but a steel frame -- sorry, a frame
9 together, and then have an expert that's able to assess
10 what was designed to see whether it would cover other
11 types of cladding system.

12 Q. Did you understand that it was a worst-case scenario
13 because obtaining a field of application report was the
14 least likely?

15 A. No, I don't believe so. I've seen field of application
16 reports used in other applications.

17 Q. So what was worst-case scenario about it, then?

18 A. Probably the -- I don't know exactly, but just a system
19 that then would allow results to be taken from that to
20 say that it would also be okay to be used in these other
21 applications or on these other systems.

22 Q. Then second item or option down:

23 "System Route (Limits Scope - Requires
24 Re-Education)."

25 What did you understand by that?

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1 A. I think at the time that was more about going down,
 2 you know, a specific system that didn't allow any level
 3 of field of application report to come from it.
 4 Q. "Requires re-education", what did you understand by
 5 that?
 6 A. I think that's in relation to the previous comments
 7 where we would have to explain to the market a lot about
 8 how we saw the market.
 9 Q. How you saw the market being what exactly?
 10 A. How the market with Kingspan as the only player in that
 11 market were working.
 12 Q. Does that mean, linking this with the email we have been
 13 looking at of 1 November from Mr Roper, re-educating the
 14 market to teach them that they had been up to this point
 15 misunderstanding the meaning and scope of BS 8414 tests
 16 and the BR 135 criteria by allowing Kingspan K15 onto
 17 a wider set of applications than that which was tested?
 18 A. Yes, I think that's what it means.
 19 Q. Right. And that was risky because that might invite
 20 a lawsuit from Kingspan, among other things.
 21 A. Quite possibly.
 22 Q. Now, the third option:
 23 •" Test & Launch Without BBA & LABC.
 24 •" Test & Launch With BBA & LABC.
 25 •" Opt Out Of Above 18m."

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1 At the meeting, do you remember discussing opting
 2 out of above 18 metres?
 3 A. I think on the basis that that was put as a bullet point
 4 on a number of slides, it would have been mentioned,
 5 yes.
 6 Q. Was there any discussion about whether or not in fact
 7 what Celotex should be doing is not going anywhere near
 8 the above-18-metre market?
 9 A. I don't recall that being part of the conversation --
 10 Q. So --
 11 A. -- in any detail.
 12 Q. So although this was listed on this slide as an option,
 13 in fact was a decision taken at this meeting that that
 14 was not an option?
 15 A. At that time, I don't believe opting out of above
 16 18 metres was where we were going to go until we had
 17 looked at doing some testing.
 18 Q. Right. So it remained an option depending on the test?
 19 A. I believe so, yes. Until we launched the product into
 20 the market, opting out was always an option.
 21 Q. I follow.
 22 Now, can we go to the next slide, 15
 23 {CEL00011199/15}, please. That seems to set out three
 24 outcomes:
 25 •" ACM Panel With Improved Barrier System (<50%)

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1 •" A2 Panel With Standard Barrier (80%)
 2 •" Cement Particle With Standard Barrier (90%)."
 3 Was there any discussion of that slide?
 4 A. Again, on the basis that it had been put together, it
 5 would be strange if it wasn't discussed. I don't recall
 6 the specific discussions around each of those three
 7 options, but I can't believe that that wouldn't have
 8 been discussed as part of the meeting.
 9 Q. Did you all come to the view that there was a less than
 10 50% chance that success would be possible using an ACM
 11 panel with improved barrier system?
 12 A. I believe they were a -- the probabilities were put
 13 together by Jon based on his understanding of the
 14 market. I don't believe we talked about the
 15 percentages.
 16 Q. Was there any disagreement at the meeting about those
 17 percentages?
 18 A. Not that I can recall.
 19 Q. Using a cement particle board as Kingspan had done would
 20 give you a 90% chance of success, as we can see,
 21 wouldn't it?
 22 A. That's what that's saying, yes.
 23 Q. Was there any discussion of going down that route at the
 24 meeting?
 25 A. I don't recall.

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1 Q. Now, following this meeting, Celotex decided to adopt
 2 the option of testing in a system using A2 cladding,
 3 didn't it?
 4 A. Yes.
 5 Q. In his statement -- let's look at it, Mr Roper's
 6 statement at {CEL00010052/10}, please, he says something
 7 about this meeting at paragraph 5.14. He says he wasn't
 8 present at the meeting, but in fact he corrected that
 9 yesterday in his evidence --
 10 A. Okay.
 11 Q. -- and said that he was.
 12 To the best of your recollection, is he right about
 13 that?
 14 A. My understanding is that Jon was there because he was
 15 asked to set the meeting up, he was asked to prepare the
 16 slides. Therefore, there would be no reason why Jon
 17 wouldn't have come to the meeting, having prepared the
 18 slides. That just wouldn't have happened.
 19 Q. No. And did he present the slides, do you remember?
 20 A. As certain as I can be, he would have done. I don't
 21 believe anybody else would have presented the slides.
 22 Q. Right.
 23 Then in paragraph 5.14 he says:
 24 "I was aware that Rob and Paul expressed their views
 25 at this meeting. These were not entirely aligned.

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1 Prior to this meeting, I was already aware that Rob was
 2 clear in his views that BS 8414 was a system test and
 3 that the test report relating to a successful test was
 4 only applicable to that particular system.”
 5 Pausing there, were you aware before the meeting
 6 that those were Rob Warren’s views?
 7 A. Not that I recall, and I don’t believe Rob and I had
 8 particularly differing views on the importance of having
 9 a system that we communicated as it being a system.
 10 Q. Then it goes on:
 11 “Craig Chambers and Paul [that’s you] were aware
 12 that Kingspan was selling successfully on the basis of
 13 one BS 8414 test as to which it provided only limited
 14 information to the market and that Kingspan did not seem
 15 to be being asked for further details of their test.
 16 Craig Chambers and Paul’s view was that adopting Rob’s
 17 interpretation would limit sales and would not be
 18 a reflection of market dynamics.”
 19 Is that correct? Was that your view?
 20 A. No, that wasn’t my view. My view was that if we were to
 21 go with this market, we should be very clear that we
 22 have tested in a particular way to a particular system.
 23 People might want to take those results and make the
 24 decision that, based on that, the product can also be
 25 used in a different system, but I don’t believe that

1 mine and Craig’s view was entirely different to Rob’s,
 2 no.
 3 Q. Right. You see, Mr Roper remembers it differently.
 4 A. Okay.
 5 Q. And that Rob Warren and he in his own mind were taking
 6 what he called the technical approach, namely paying
 7 strict adherence to the limits of the BS 8414 test as
 8 a system test, and that you and Mr Chambers were taking
 9 a more commercial view which wouldn’t limit sales. Is
 10 that a fair description of the division of views?
 11 A. I’m a little bit confused because my interpretation
 12 seems to be similar to Rob’s, which is there’s a test
 13 which we’ve carried out, and we will be open with how
 14 we’ve tested and try and communicate better to the
 15 market that that’s how we have tested. Naturally, that
 16 approach would have limited sales, but I believe that
 17 anybody in the business and in that meeting would know
 18 it would limit sales. We weren’t saying to go out and
 19 sell it into any cladding system that you like.
 20 Q. He says:
 21 “Craig Chambers and Paul’s view was that adopting
 22 Rob’s interpretation ...”
 23 That’s an interpretation of the BS 8414 test and
 24 BR 135 criteria, as is obvious from the context.
 25 Did you adopt or have a different interpretation

1 from the one espoused by Rob Warren, do you think?
 2 A. My view almost seems the same as Rob’s, that’s why I’m
 3 a little bit confused. I don’t know -- I can’t
 4 understand from this, from Jon’s statement, what Rob’s
 5 interpretation was that makes it different to mine.
 6 I was clear that it was -- BS 8414 was a system test,
 7 and that we would make it clear in our marketing the
 8 system which we had tested.
 9 Q. Well, let’s see how that turns out.
 10 Can we move forward, then, into February 2014 and
 11 the test itself.
 12 You say in your first statement, paragraph 94
 13 {CEL00010058/27}, that you weren’t involved in the
 14 preparations for the first test; is that right?
 15 A. Not that I can recall, no.
 16 Q. Considering that Mr Roper reported to you, are you sure
 17 that that is right?
 18 A. Whilst Jon reported to me, I’m confident that all of
 19 that knowledge or expertise that he needed around the
 20 actual testing he would have got from others, be it Rob,
 21 be it Jamie or third parties he was using to do the
 22 test, or the test house itself.
 23 Q. Now, considering that Mr Roper reported to you, were
 24 there any aspects of the February 2014 test that you
 25 weren’t aware of?

1 A. Not that I can recall, no.
 2 Q. No.
 3 Now, you weren’t present at the test in
 4 February 2014, were you?
 5 A. No.
 6 Q. But Mr Roper was, wasn’t he?
 7 A. I believe -- yes, Mr Roper was, yes.
 8 Q. And he reported back to you following the test, didn’t
 9 he? He rang you.
 10 A. Yes, he would have -- I’m sure he would have rung me to
 11 say whether it had passed or failed.
 12 Q. And he rang you to tell you that it had failed, didn’t
 13 he?
 14 A. Yes, I think he did.
 15 Q. And he rang you from the car, I think we were told
 16 yesterday, on his return from the Watford fire hall.
 17 A. Yes.
 18 Q. Mr Hayes said that there was a lot of emotion around
 19 that call. That’s what he says in his statement,
 20 because he was in the car at the time with Mr Roper.
 21 Do you remember that that conversation was
 22 an emotional one?
 23 A. I wouldn’t say it was emotional. I think there would
 24 have been disappointment, but I think that would have
 25 been something that would have been disappointing

1 regardless of the application. We were a business that
 2 relied on doing testing, and a test not passing would
 3 have been met with some level of disappointment for
 4 a few reasons.
 5 Q. Can we look at your statement at page 28
 6 {CEL00010058/28}, please, and look at paragraph 97
 7 together. You say there:
 8 "I was disappointed when I heard that the system had
 9 failed the test. We had invested time and money and had
 10 not got the result we were hoping for. The fact that
 11 the test had failed was therefore a setback, of course,
 12 but it was not in my view a particularly significant one
 13 for Celotex. This was because the plan to develop
 14 RS5000 was only one of a number of projects that Celotex
 15 was pursuing at that time."
 16 Is it really true, Mr Evans, given that, without
 17 a pass, you couldn't market RS5000 above 18 metres at
 18 all?
 19 A. Sorry, can you say that again?
 20 Q. Was it really true that it wasn't a significant setback
 21 given that, without a pass of the BS 8414 test, you
 22 couldn't market RS5000 above 18 metres at all?
 23 A. No, because we could discuss what the next steps were
 24 for that if we needed to, and the difference between
 25 a business pre-acquisition by Saint-Gobain and

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1 post-acquisition by Saint-Gobain is I was probably
 2 a little bit more aware that, if we needed to, there
 3 would be more money available for it. So doing a second
 4 test wouldn't have been as much of a problem as maybe
 5 some people might have thought it might have been.
 6 Q. I understand that, but it must have been a setback, and
 7 a significant one, I have to suggest to you, given that,
 8 without a BS 8414 test pass, you couldn't access the
 9 above-18-metre market at all.
 10 A. Yes, it was a disappointment, it was a setback, but
 11 I can't remember it being a huge problem for the
 12 business. It just meant that our launch of above
 13 18 metres would need to be delayed or -- well, be
 14 delayed, I would imagine.
 15 Q. Well, you don't say that. You actually say in the last
 16 sentence there that the reason it wasn't, in your view,
 17 a particularly significant setback for Celotex was, and
 18 I quote:
 19 "... because the plan to develop RS5000 was only one
 20 of a number of projects that Celotex was pursuing at
 21 that time."
 22 Now, the impression the reader gets from that is
 23 that it wasn't a significant setback because the
 24 18-metre market project was only one of a number of
 25 projects. You are now saying something different,

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1 I think.
 2 A. Yeah, sorry, I'm ... there was a number of projects that
 3 Celotex was working on, and it was a setback and
 4 a disappointment, but I don't think it was a major
 5 setback because there would have been an opportunity,
 6 probably in my mind, to know that if we wanted to, we
 7 could go and test again if we needed to.
 8 Q. My point is that you don't say that as the reason for
 9 your thinking at the time here in paragraph 97. You
 10 have accorded a different reason, which was that RS5000
 11 was only one of a number of projects, and now you're
 12 saying it wasn't a significant setback because you could
 13 have got more money for a later test. Which is it?
 14 A. I think it's a combination of both things.
 15 Q. Well, why haven't you made that clearer here?
 16 A. I don't know.
 17 Q. I mean, why have I got to ask you questions about this?
 18 (Pause)
 19 A. That was my recollection when I put my statement
 20 together.
 21 Q. I mean, the reality is that the fail meant that you
 22 would now have to work out how RS5000, a project which
 23 had been on the stocks since January 2013, could now
 24 pass a BS 8414 test; no?
 25 A. Yes, we would need to look at how we would need to

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1 re-test.
 2 Q. And you would have to arrange a new test?
 3 A. Yes.
 4 Q. And you would have to wait for a new test?
 5 A. Yes.
 6 Q. And you would have to get the budget for a new test?
 7 A. Yes.
 8 Q. And had you told Joe Mahoney before February 2014 that
 9 this first one might not work and he might have to open
 10 the coffers for a second test?
 11 A. I don't recall whether I told Joe that at all.
 12 Q. No.
 13 So given all those things that you would now have to
 14 do without any very clear view as to how to go about
 15 passing a second test, I have to suggest to you that it
 16 was a significant setback for Celotex, and that the
 17 reason you have given at paragraph 97 is just wrong.
 18 A. No, I wouldn't say it was wrong. As I recall, the
 19 disappointment of failing the first test was of course
 20 a disappointment for the people that had been working on
 21 the project and for the business in terms of its plans,
 22 but I don't think it significantly stopped the process
 23 for that particular product, as well as the other
 24 projects that we were working on.
 25 Q. I suggest you are downplaying this, aren't you?

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1 A. That doesn't ...
 2 (Pause)
 3 I can only go based on the experience that I can
 4 remember from the time.
 5 SIR MARTIN MOORE-BICK: I'm sorry to interrupt you.
 6 MR MILLETT: Go ahead, Mr Chairman.
 7 SIR MARTIN MOORE-BICK: Can you just help me with this: if
 8 I have understood your evidence correctly, this test was
 9 intended to be a representative test in the choice of
 10 materials.
 11 A. Yes.
 12 SIR MARTIN MOORE-BICK: And that was deliberate, so that you
 13 could, if it passed, say to people, "We have tested it
 14 in a system which is representative of what is being
 15 actually used out there"; is that right?
 16 A. Yes.
 17 SIR MARTIN MOORE-BICK: Once it had failed, what led you to
 18 believe that it could be modified in a way that would
 19 still be representative but likely to pass?
 20 A. I don't know the answer to that or how I felt at the
 21 time about what that would be, other than taking advice
 22 from people in the team as to how that could happen.
 23 SIR MARTIN MOORE-BICK: Yes. I mean, without a pass, you
 24 were barred from the over-18-metre market, weren't you?
 25 A. Yes.

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1 SIR MARTIN MOORE-BICK: So unless you could see some way
 2 through to getting a representative test that did pass,
 3 you were a bit stuck.
 4 A. Yes, we would have been.
 5 SIR MARTIN MOORE-BICK: All right, thank you very much.
 6 MR MILLETT: Can you please turn to page 29 of your
 7 statement {CEL00010058/29}. At paragraph 102 there, you
 8 say:
 9 "Although I would have been consulted the decision
 10 on what to retest would not have been mine because I did
 11 not have the technical knowledge or expertise to make
 12 that decision. The decision making process would have
 13 involved Mr Roper and Mr Warren."
 14 Just pausing there, why would Mr Roper have had any
 15 technical knowledge or expertise, as someone who had
 16 only left university the year before, maybe 18 months
 17 before?
 18 A. I think it's more based on the knowledge and expertise
 19 that he's built up working on this application, rather
 20 than his broader, qualified technical knowledge, is what
 21 I mean there.
 22 Q. Are you really saying that he would have been
 23 a decision-maker in your place in relation to the
 24 decision to re-test?
 25 A. I think he would have been able to recommend what needed

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1 to happen and people in the business would have listened
 2 to what he had to say.
 3 Q. Maybe, but you're not saying that he was
 4 a decision-maker as opposed to a contributor to the
 5 information which would form the basis of that decision?
 6 A. I think the decision about what we were going to do,
 7 using that word there, the actual -- the making of the
 8 decision would have come from Jon and Rob, having that
 9 technical knowledge that was --
 10 Q. You're not saying that the product manager that you line
 11 managed was going to be the ultimate decision-maker and
 12 you not, are you?
 13 A. I don't think I would have been the ultimate
 14 decision-maker either. I wouldn't have been confident
 15 making that decision, which is why I would have taken
 16 that decision to be more of a project approach, similar
 17 to what I did back in November when I was getting
 18 everybody together to discuss Jon's research. I didn't
 19 have that technical knowledge myself.
 20 Q. You were involved in the overall decision to re-test,
 21 weren't you?
 22 A. Yes, I would have supported a decision to re-test.
 23 Q. Which is why you go on to say:
 24 "As for the overall decision to retest, in addition
 25 to me Mr Chambers would have been involved."

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1 So you have identified a number of people here, but
 2 actually you were one of the ultimate decision-makers
 3 about whether there should be a re-test; correct?
 4 A. About -- to re-test, yes. The technical intricacies of
 5 the testing, then, no.
 6 Q. You go on to say:
 7 "This was to be the first major product launch since
 8 Saint-Gobain's acquisition of Celotex in 2012 so not
 9 only was he [Mr Chambers] interested in being kept
 10 apprised of progress but the cost of the retest was such
 11 that it would have required consultation with and
 12 approval by him."
 13 Now, given that this was the first product launch
 14 since the Saint-Gobain acquisition, and significant
 15 enough that the CEO would have been involved in the
 16 decision to re-test, combined with the fact that Celotex
 17 had been considering the above-18-metre market since
 18 2012 and you didn't want any delay in the timetable,
 19 this, I have to suggest to you, was a major setback
 20 which would have required an important decision to be
 21 made by senior decision-makers.
 22 A. I think when you piece all of that together, I can see
 23 why you would say a major setback. All I can say is
 24 what it felt like at the time, and there wasn't ... it
 25 didn't feel like it was the major setback.

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1 Q. Now, following the failed test, you then sent Mr Roper
 2 a meeting invite for a meeting on 18 February 2014,
 3 I think. I'll show you the document. It's
 4 {CEL00003072}. There it is.
 5 Do you remember having a meeting with Mr Roper in
 6 your office on 18 February 2014?
 7 A. No, I don't, sorry.
 8 Q. The subject of the meeting is BR 135, and given the
 9 proximity to the failed test, presumably you discussed
 10 that with him. Can we take it from that, or can you not
 11 assist?
 12 A. I can't agree -- sorry, I can't remember whether that
 13 meeting happened, so I can't answer that yes or no,
 14 really.
 15 Q. Do you remember having a discussion, whether in
 16 a meeting or otherwise, with Mr Roper after the failed
 17 test about what would be required to pass the test next
 18 time round?
 19 A. I'm sure there was some discussion. Whether it was with
 20 just myself and Jon or whether it was with other people,
 21 I don't know. My understanding is that we decided to
 22 test a thicker cladding panel.
 23 Q. Can we go to {CEL00010154/19}, please. This is
 24 Mr Hayes' witness statement again, and I would like to
 25 look with you, please, if I can, at paragraphs 57 and 58

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1 there. They're quite long, but what Mr Hayes says is
 2 that he was involved in meetings with you, Jon Roper and
 3 Rob Warren in which you started to draw conclusions
 4 about what caused the fire to spread to the top in the
 5 way that it did. That's what he says at the beginning
 6 of paragraph 58.
 7 Do you remember those discussions?
 8 A. I don't recall a meeting between myself, Jon, Rob and
 9 Jamie that talked in that detail.
 10 Q. You see, he goes on in the second sentence of
 11 paragraph 58 to say:
 12 "I was involved in these meetings and discussions
 13 with JR, PE and RW."
 14 But you say you don't remember those?
 15 A. I don't recall them, no.
 16 Q. You don't recall them, but you don't say they didn't
 17 happen?
 18 A. No, I can't say they didn't happen, but I don't recall
 19 them happening.
 20 Q. At the end of paragraph 58 he says that:
 21 "Collectively, we were content with the remaining
 22 components in the rig, including the use of RS5000,
 23 which did not change from the First Test to the Second
 24 Test."
 25 Do you recall any discussions at that time or

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1 perhaps later involving you about changing the
 2 components in the rig?
 3 A. My only recollection of a decision that was made from
 4 the first test to the second test was the changing of
 5 the thickness of the cladding panel.
 6 Q. Let's go on and see what he says on that score and other
 7 scores over the page {CEL00010154/20}, please, and I'm
 8 going to read you paragraphs 61 and 62 of his statement.
 9 At 61, he says, on page 20:
 10 "61. I therefore went to JR, RW and PE with
 11 a suggestion that we also include an additional board of
 12 material behind the cladding, just at the point of the
 13 fire barriers. This, in conjunction with the thicker
 14 cladding would increase the time it took for any fire to
 15 progress through the cladding and consequently climb the
 16 rig.
 17 "62. The board I suggested was a 6mm magnesium
 18 oxide board placed behind the cladding (the 'Additional
 19 Material'). This would be used in conjunction with the
 20 now 12mm thick layer of the cladding. JR and PE agreed
 21 to adopt this approach in principle with PE having the
 22 final sign off. However, they also decided to amend the
 23 thickness of the cladding at the point where the
 24 Additional Material was placed, from 12mm to 8mm thick,
 25 to try and ensure continuity of the cladding surface

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1 across the rig. We wanted to use 6mm cladding at the
 2 point where the 6mm Additional Material was to be
 3 placed, so that that the two combined would be the same
 4 thickness as the 12mm cladding across the rest of the
 5 rig. Unfortunately Marley Eternit was not sold in 6mm
 6 thickness but only 8mm or 12mm, as evidenced in the
 7 email correspondence sourcing the materials [which he
 8 exhibits]."
 9 I have read that all to you.
 10 Do you recall that it was Mr Hayes who came up with
 11 the idea of placing a 6-millimetre magnesium oxide board
 12 behind the thickened cladding?
 13 A. No. As I said, the only recollection I have of the
 14 change between the first test and the second test was
 15 the move to a thicker cladding panel.
 16 Q. Let's just go back to paragraph 62 and take it stage by
 17 stage to see exactly what it is you do and don't recall.
 18 Now, he says in the third line:
 19 "JR ..."
 20 That's Jon Roper.
 21 A. Yes.
 22 Q. "... and PE agreed to adopt this approach in principle
 23 with PE having the final sign off."
 24 Jon Roper recalls that. What about you? Did you
 25 agree to adopt this approach in principle?

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1 A. No.
2 Q. Did you have the final sign-off?
3 A. No, I wouldn't have had final sign-off. I wouldn't have
4 given myself final sign-off, because of my -- compared
5 to the other individuals involved in that test and the
6 designing and their knowledge, I wouldn't have been
7 confident giving any technical sign-off on the design of
8 a new rig.
9 Q. Both Mr Roper and Mr Hayes recall the suggestion being
10 made and you agreeing to it and having the final
11 sign-off. Are you saying that they're wrong in their
12 recollection or simply that you don't recall one way or
13 the other?
14 A. I would say they're wrong, because I know from
15 everything that's happened, from the launch of the
16 product through to what's happened, not one point in any
17 of that did I know about a 6-mil magnesium oxide board
18 until I found a reference to it on my phone in
19 November 2017.
20 Q. Is that a fact?
21 A. Yes.
22 Q. Are you telling us you had no idea --
23 A. I didn't know that --
24 Q. -- about the addition of the 6-millimetre magnesium
25 board behind the 8-mil, as it turned out, Marley Eternit

1 Natura on the rig?
2 A. The only thing I knew was that -- that I recall is that
3 we changed the thickness of the cladding panel.
4 Q. Are you sure about that?
5 A. Yes.
6 Q. Be careful here. This isn't just that you can't recall
7 one way or the other; you're saying, are you, that both
8 Mr Roper in his evidence yesterday and Mr Hayes in his
9 evidence here at paragraph 62 are false?
10 A. What I'm saying is that I didn't know that we had put
11 a 6-mil magnesium oxide. I know there's the NHBC
12 discussion, which I've seen in my evidence as well,
13 where information's been given to me and I haven't taken
14 that information or understood that information for
15 whatever reason, but I didn't know that what we were
16 doing here -- I didn't know that we were doing it.
17 Q. So just to be clear, again, I'm going to put this to you
18 one more time: are you saying that what Jon Roper said
19 yesterday and what Mr Hayes is saying here about you
20 agreeing to adopt this approach is false?
21 A. Yes. Based on what I remember and what I recall, I do
22 not give -- I did not know that we had put an extra
23 layer to -- of magnesium oxide.
24 Q. You need to be very clear about the difference between
25 saying you definitely didn't agree or you can't

1 remember. Is this a failure of recollection on your
2 part, or are you saying --
3 A. I don't --
4 Q. Are you saying -- let me finish the question -- that
5 they are giving false evidence, Mr Evans?
6 A. I'm saying that I didn't know that that was -- that that
7 had happened.
8 Q. Right. I'm going to take that as your evidence today
9 that they are giving false evidence on this point.
10 A. Okay.
11 Q. If I'm wrong about that, please do correct me.
12 Now, let's move forward. {CEL00003093}, please.
13 This is a presentation which was done on 11 March 2014.
14 Have you seen it before?
15 A. Sorry, what was the date?
16 Q. 11 March 2014.
17 A. I don't know.
18 Q. Well, I'll show it to you. It runs to some 17 pages or
19 so. Let's just look at the first few slides and see if
20 they trigger a recollection.
21 {CEL00003093/2}:
22 "Project Objective.
23 "Objectives: Gain BR 135 Approval With
24 Celotex RS5000 For Use In Buildings Above 18m by Q1
25 2014."

1 Then the next slide {CEL00003093/3}, "Project
2 Update", et cetera.
3 Is this familiar to you?
4 A. It looks like the template that would have been given at
5 a SPINN meeting.
6 Q. Right. I see.
7 A. That first slide reminded me that it looks like it would
8 be a SPINN presentation.
9 Q. If we go on in it, please, to page 3, you could see that
10 the criteria for BS 8414-2 testing -- do you see
11 that? -- was:
12 •" Level 2 ... Thermocouples Do Not Exceed
13 600 Degrees Within 15 Mins.
14 •" Test Duration Must Be Full 30 Mins."
15 Do you remember seeing that?
16 A. I don't recall the presentation. When you said the
17 March presentation, that wasn't a presentation that
18 I recalled. Now I know it's a SPINN presentation, but
19 no, I don't necessarily remember this presentation.
20 Q. I said to you that it was a 17-page document; in fact,
21 it's a three-page document, not a 17-page document, we
22 will come to that later on, but you say it was done for
23 a SPINN?
24 A. Yes, that would be the general way a SPINN would run,
25 each project manager would give a brief update on their

1 project.

2 Q. If you look at page 4 {CEL00003093/4}, "Actions For
3 Coming Month":
4 "Re-Testing Due Mid-April."
5 So do we take it that, by the time of this slide
6 meeting, budget had been released for a new test?

7 A. I wouldn't know whether budget had been or spend had
8 been fully approved, but it would sound that way, yes.

9 Q. In that same slide in the second bullet point it says:
10 "Improved Fire Barrier System Proposed (Meeting With
11 Fire Barrier Manufacturer Tomorrow)."
12 Do you remember being told that there was
13 an upcoming meeting with a fire barrier manufacturer?

14 A. Not that I recall, no.

15 Q. What was that in relation to, do you remember?

16 A. No, I think based on evidence I've seen since, it would
17 have been a meeting with a fire barrier manufacturer.

18 Q. Right.
19 Let's then move on to the May test itself. Can we
20 please go to Mr Roper's statement, {CEL00010052/13},
21 please. At paragraph 5.35 of his statement, if we just
22 look at that together, he says there at the foot of the
23 page:
24 "The team at Celotex had wanted Patrick Jones to
25 construct the rig for the second test because Paul, Rob

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1 and I decided that we did not want to pay for another
2 set of drawings to be created and Patrick knew the
3 system from the first test. We thought that Patrick
4 could oversee the construction without the need for
5 revised drawings."

6 Then over the page {CEL00010052/14}, it says:
7 "Patrick was instructed by me (I passed instructions
8 on from Paul and Rob) to build the same system as for
9 the first test with two changes, thickening the cladding
10 panel to 12mm and inserting the magnesium oxide board on
11 the fire barrier at level 2 and at the top of the rig."
12 Now, that was his evidence.
13 Do you recall having given Mr Roper such
14 instructions?

15 A. No, I don't.

16 Q. Do you recall whether Mr Warren had done so?

17 A. I don't know.

18 Q. Given your answers earlier on, I think you deny that you
19 were aware of the existence of magnesium oxide at the
20 level 2 thermocouples and the top of the rig?

21 A. Yes.

22 Q. So are you saying that Mr Roper is lying when, in the
23 brackets at the top of page 14, he said "I passed
24 instructions on from Paul and Rob"?

25 A. What I'm saying is that I know that I didn't -- I know

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1 that I didn't know that there had been some magnesium
2 oxide board put on, on level 2.

3 Q. Well, how can you account for the fact that Mr Roper's
4 clear recollection, which he confirmed on oath yesterday
5 to the Chairman and the panel, was that he did pass
6 those instructions on to Patrick Jones from you and
7 Rob Warren? How can you account for that?

8 A. I don't know. Only on what I know, and only on the fact
9 that I saw the product launch and I saw the product sell
10 into the market and everything else that's happened
11 since then, and not at any point had I known or recalled
12 at any time the fact that we'd put magnesium oxide
13 boards at the fire barriers.

14 Q. Now, you say in your statement at paragraph 106 on
15 page 30 {CEL00010058/30} that you weren't present at the
16 May test.

17 A. No.

18 Q. Is that right?

19 A. I wasn't present at either test.

20 Q. Now, Mr Clark in his statement -- he is the BRE -- says
21 at paragraph 174 on page 41 of his statement at
22 {BRE00005768/41} -- perhaps let's look at that -- he
23 says that you were present. He says in the second line:
24 "I am aware that Paul Evans of Celotex was also
25 involved in the test project at a later date (and was

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1 present at the second test on 2 May 2014), but I cannot
2 recall any specific interaction with him before then."
3 He recalls you as being present at the second test.
4 You say you weren't.

5 A. No, I don't believe I was at either test.

6 Q. Can you account for how it is that Mr Clark recalls you
7 being there?

8 A. I can't, no.

9 Q. Let's move on to a document after the test,
10 {CEL00010627}, please. This is Mr Roper's message to
11 you dated 8 May 2014, about a meeting in CC's office on
12 12 May. Do you see that?

13 A. Yes.

14 Q. CC, he told us yesterday, was Craig Chambers.

15 A. Yes.

16 Q. Do you recall receiving this invitation?

17 A. I don't recall receiving the invitation.

18 Q. Do you recall going to a meeting in Craig Chambers'
19 office with Jon Roper on 12 May?

20 A. I recall having meetings with Craig and Jon in Craig's
21 office. I don't recall whether that was on 12 May or
22 not.

23 Q. Very well. Do you recall that in that meeting,
24 regardless of the date, you discussed the recent test?

25 A. I don't recall.

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1 Q. Do you remember what the meeting was about?
 2 A. If it was about above 18 metres and I was there, I can
 3 only assume it was about the above-18-metre market and
 4 the project.
 5 Q. Is it right that, as a result of the test and at that
 6 meeting, you asked Mr Roper to produce some slides
 7 summarising the testing position?
 8 A. I know from the dates and from what I've seen since that
 9 there was a MAG meeting at some point a couple of days
 10 afterwards.
 11 Q. Indeed, {CELO0009566}. That is the invitation or agenda
 12 for a meeting of MAG. Participants: C Chambers, and
 13 various other people, including Rob Warren, P Evans and
 14 Louise Garlick. Apologies: R Warren. Date: 14 May.
 15 Start: 8.30. End: 12.30. Then in item 3 on the agenda,
 16 you can see:
 17 "Flat Roofing Launch Plan - review and discussion.
 18 "Above 18M - review and discussion."
 19 11.30 start and the end at 12.30. Responsible: PE.
 20 Do you remember that? Do you remember receiving
 21 that agenda, Mr Evans?
 22 A. Not specifically, but it would have been common purpose
 23 for -- common process, sorry, for a MAG agenda to come
 24 out to people.
 25 Q. Mr Roper isn't listed as an attendee, and he told us

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1 yesterday he wasn't there. You don't have any reason to
 2 think that he was, do you?
 3 A. I believe that Jon Roper did come to present that
 4 presentation.
 5 Q. All right.
 6 Let's look at your first statement,
 7 {CELO0010058/30}, bottom of the page, please,
 8 paragraph 110. You say:
 9 "A MAG meeting took place on 13 and 14 May 2014
 10 which I attended. The agenda for the second day of that
 11 meeting included at item 3 'Above 18M - review and
 12 discussion.'
 13 And we've seen all that:
 14 "My initials were listed next to it under the column
 15 headed 'Responsible'. Mr Roper e-mailed a Powerpoint
 16 presentation entitled 'Above 18m' to me at 10.46am on
 17 14 May 2014, when I would already have been in the
 18 meeting. Mr Roper once attended and presented at a MAG
 19 meeting and I believe that it was at this meeting that
 20 he did so. I do not believe that I presented these
 21 slides to the MAG."
 22 Now, if we look at {CELO0000932}, please, we can see
 23 that Mr Roper sends you an email on 14 May 2014 at
 24 10.46, can you see that?
 25 A. Yes.

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1 Q. And the subject is "Emailing: MAG Presentation", and all
 2 the message says is:
 3 "Your message is ready to be sent with the following
 4 file or link attachments: MAG Presentation ..."
 5 A. Yes.
 6 Q. Now, at that time, 10.46, the meeting had already
 7 started, but you hadn't yet got to agenda item number 3,
 8 had you?
 9 A. Based on those timings, no.
 10 Q. This was about 45 minutes before the above-18-metre
 11 review slot which you were going to run.
 12 A. Yes.
 13 Q. Now, do you know why he sent them to you at this time if
 14 it was he who was going to be presenting those slides?
 15 A. I would imagine because a common practice at the MAG
 16 meetings was people would have their laptops available,
 17 and if Jon was only coming in to give a small
 18 presentation, he would email it to me and then I could
 19 load it onto the screen that we had in the boardroom.
 20 Q. The most obvious explanation is that he was sending them
 21 to you for you to present, or is that not right?
 22 A. I don't believe that would have happened, on the basis
 23 that I wouldn't have accepted getting slides to
 24 a presentation 45 minutes before I was due to present
 25 it.

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1 Q. Did you study these slides when they arrived?
 2 A. If Jon was presenting them, I wouldn't have done, no.
 3 Q. All right.
 4 A. I was in the middle --
 5 Q. Let's look at the presentation, {CELO0010629}, please.
 6 This is the 17-page slideshow.
 7 A. Okay.
 8 Q. It's entitled "Above 18m", and it's the presentation
 9 that you have referred to in your statement in the
 10 paragraph we've just seen.
 11 If we go to slide 11 {CELO0010629/11}, please, first
 12 of all, it's headed "Market Research", and it says:
 13 •" Everybody Uses K15 As There Is No Alternative
 14 •" Nobody Understands The Test Requirements
 15 (Architects Ask If It Can Be Used Above 18m, The Answer
 16 is YES)
 17 •" Building Control Have Hugely Differing Levels Of
 18 Understanding On The Subject
 19 •" Give Us A Board That Is An Alternative To
 20 Kingspan & We'll Buy It!"
 21 Is this Mr Roper's presentation of what he had found
 22 through his market research that you had asked him to
 23 undertake?
 24 A. I believe they're slides that Jon put together, so they
 25 would be his words, yes.

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1 Q. Yes, and you understood that when he was putting that
2 slide together, these were the fruits of his research in
3 the market? That's all I'm asking you.
4 A. Yeah, a very, very brief summary, but yes.
5 Q. Yes. It's a summary of the four main bullet findings
6 that he has found. There is no difficulty about that,
7 is there? That's what he found and that's what you
8 understood him to have found.
9 A. Yes.
10 Q. You didn't have any doubts about it, did you?
11 A. Not that I can remember, no.
12 Q. If we look at the second bullet point down it says:
13 "Nobody Understands The Test Requirements
14 (Architects Ask If It Can Be Used Above 18m, The Answer
15 is YES)."
16 Is that, to your understanding at the time,
17 a summary of what you believed Kingspan were telling
18 people?
19 A. I don't know whether that's what we knew Kingspan were
20 saying to all of the architects, I don't know.
21 Q. Is it fair to say that Celotex, through this slide if
22 not before, were aware that there was significant
23 uncertainty even among regulators, if one can call them
24 that, as to what the requirements for use of insulation
25 above 18 metres were?

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1 A. I believe, yeah, there was some uncertainty in the
2 market on this particular application, yes.
3 Q. Yes, and the second and third bullet points really just
4 identify where the confusion and ignorance lay.
5 A. Yes.
6 Q. That's fair, isn't it?
7 A. Yes.
8 Q. Yes.
9 The plan now was, rather than to educate the market
10 and possibly invite a lawsuit from Kingspan, to now
11 capitalise on that ignorance or confusion. Is that what
12 one can take from this?
13 A. I don't believe that was a decision, that we were going
14 to look to capitalise on it. I think we were going to
15 look at what Kingspan did and explain things in
16 a clearer way.
17 Q. Well, this goes back to the Chairman's question. You
18 had tried a representative rig in the February test and
19 that had failed, and you had now done the test in May,
20 and it was now to be discussed. In the light of the
21 success of the May test, wasn't the plan now to take
22 advantage of the ignorance and confusion that Mr Roper
23 had found in the market and was relaying in this slide?
24 A. I wouldn't say we were taking advantage because
25 I believe what we did when we launched was be clearer to

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1 the market how we had tested.
2 Q. Why was it relevant for the MAG meeting to know nobody
3 understands the test requirements and that architects
4 asked if it could be used above 18 metres, and the
5 answer is a capitalised "YES"? Why was it relevant?
6 A. For the MAG to know?
7 Q. Yes.
8 A. For ... to give everybody in the business
9 an understanding about the application that we were
10 planning to launch.
11 Q. Why was it relevant to know that building control had
12 hugely differing levels of understanding on the subject?
13 A. Again, to bring everybody up to speed with the research
14 that had been given.
15 Q. Why was it relevant that there was so much confusion and
16 ignorance and disputation in the marketplace?
17 A. Jon's been asked to put a presentation together and he's
18 presented what he sees as the market.
19 Q. I would suggest to you that this was being put before
20 you so that you could make a decision as to how and, if
21 so, to what extent to take advantage of it.
22 A. My belief is that Jon was just asked to come and present
23 the above-18-metre market work that had been done on the
24 basis that we had passed the second test.
25 Q. And the last bullet point:

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1 "Give Us A Board That Is An Alternative To Kingspan
2 & We'll Buy It!"
3 Was use as an alternative to K15 an express proposed
4 selling point for RS5000?
5 A. Sorry, can you repeat that question?
6 Q. I'll try it a different way.
7 Was what was being said here the fact that there was
8 a hunger in the market for an alternative to Kingspan?
9 A. In terms of the market that we would sell into, yes,
10 I believe people would have wanted more than one choice.
11 Q. So, really, what this market research is telling
12 everyone who reads this slideshow -- and one can read it
13 very simply -- is: the market's forced to use Kingspan
14 as there is no alternative, the market would love for
15 there to be a different alternative, and there is mass
16 ignorance out there. All three of those points are
17 reasons to sell RS5000 into the above-18-metre market,
18 aren't they?
19 A. I wouldn't have said we were looking at calling it mass
20 ignorance.
21 Q. Well, "Nobody understands the test requirements". How
22 would you describe that if not mass ignorance?
23 A. I don't know. I think the term "nobody understands the
24 test requirements" is very -- you know, looking at the
25 slide again now, "Nobody understands the test

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1 requirements" is a big generalisation of the market.
 2 I think people did understand.
 3 Q. These are all of them being presented as plus points,
 4 reasons to embark on selling RS5000, aren't they?
 5 A. I don't know why -- what the motive was for Jon putting
 6 those slides together, but --
 7 Q. Well, did you ask him why it was relevant that nobody
 8 understands the test requirements or that
 9 building control have hugely differing levels of
 10 understanding?
 11 A. No, not at that point.
 12 Q. No, because you understood extremely well that those two
 13 middle bullet points were further advantages or further
 14 opportunities for RS5000, weren't they?
 15 A. Based on what we tried to do in our literature and when
 16 we launched the product, we were looking to try and make
 17 it clearer to people about how we tested and what people
 18 needed to do if they wanted to use the product.
 19 Q. Slide 12, please {CEL00010629/12}.
 20 "Testing Part 1
 21 •" Cost - £25K
 22 •" System - 8mm Eternit Cladding
 23 "- Lamatherm Fire Barriers
 24 "- 100mm FR5000
 25 "- Sheathing Board

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1 "- Metsec Frame
 2 • Result - Terminated After 25 Minutes, Flames
 3 Extending Test Facility."
 4 That's a pithy summary of what happened at the
 5 February test.
 6 Is there anything in that summary that you weren't
 7 aware of when you received this slide?
 8 A. No, but on the basis that the presentation only came to
 9 me whilst I was in the middle of a meeting, I don't
 10 think I would have read the slides before they were
 11 presented.
 12 Q. All right. You would have read them afterwards; no? Or
 13 in the years afterwards, and had a look back at them?
 14 I'm asking you now, just looking at it now, is there
 15 anything in that slide that you didn't know at the time
 16 about the first test?
 17 A. No.
 18 Q. No.
 19 Next slide, please {CEL00010629/13}. That's
 20 a photograph of the mode of failure. Do you remember
 21 seeing that? It's quite an eye-catching photograph.
 22 A. I recall seeing pictures from the test report.
 23 Q. Yes.
 24 Next slide, please {CEL00010629/14}:
 25 "Testing Part 2

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1 •" Cost- £25k
 2 • System - 12mm Eternit Cladding."
 3 That's different, isn't it, from the 8 millimetres
 4 we saw before; yes?
 5 A. (Witness nods).
 6 Q. You would have known, as I think you've told us, that
 7 the May test involved thicker cladding than the February
 8 test?
 9 A. Yes.
 10 Q. Then it goes on to say:
 11 "Lamatherm Fire Barriers With 6mm Magnesium Oxide."
 12 A. Yes.
 13 Q. So you would have seen from that that the fire barriers,
 14 unlike the test in February, had 6-millimetre magnesium
 15 oxide added to it.
 16 A. Yes.
 17 Q. So you saw that. So you did know that the 6-millimetre
 18 magnesium oxide was added to the May test?
 19 A. I knew, looking at that, there would have been
 20 information given to me, but I didn't know why we'd done
 21 it.
 22 Q. I see. So I'm just trying to understand your evidence
 23 earlier, when I showed you what Mr Hayes had said. Are
 24 you saying now that you did know there was
 25 a 6-millimetre magnesium oxide added to the second test

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1 or not?
 2 A. On the basis of that being one slide presented to me
 3 now, but I wouldn't have recalled at the time, and
 4 I didn't recall and I would never have known why we were
 5 putting that extra magnesium oxide into the system.
 6 Q. Well, now you have moved to a why. I want to know the
 7 what.
 8 You told us with some strenuousness not half an hour
 9 ago, Mr Evans, that you were not aware at all of
 10 a decision to add 6 millimetres of magnesium oxide to
 11 the test. Are you now saying that you were aware, as
 12 this slide shows?
 13 A. At the time of the test, I wasn't aware that we had put
 14 6-mil magnesium oxide into the second tested system. It
 15 would appear that this has then been communicated to the
 16 MAG, and I haven't ... it hasn't -- the penny hasn't
 17 dropped with me.
 18 Q. We can check the transcript. I'm sure you said to us
 19 earlier that you weren't aware of the addition of
 20 a 6-millimetre magnesium oxide board until you saw
 21 a picture of it on your phone in 2017.
 22 A. Yes, sorry, I had forgotten it was on this presentation.
 23 Q. I'm sure.
 24 A. I was trying to think of the other evidence that I had
 25 seen since with the benefit of having been given

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1 evidence provided to me to make my statement.
 2 Q. Mr Evans, I'm not interested in your trying to piece
 3 different pieces of evidence together. What I want,
 4 please, from you is the truth, if you don't mind.
 5 Let's start again.
 6 I've shown you the slide. It comes to you on
 7 14 May 2014 in the morning. I've shown you other
 8 evidence from other witnesses who have told and are
 9 going to tell the Inquiry that you knew all along about
 10 the 6-millimetre magnesium oxide board. Here is a slide
 11 that you saw on 14 May which identifies the addition of
 12 the 6-millimetre magnesium oxide board.
 13 Now, when did you become aware that the second test
 14 involved the addition of a 6-millimetre magnesium oxide
 15 board, please?
 16 A. The only time I -- it resonated with me that we had done
 17 something with that was when -- so there's this piece of
 18 evidence here and there's the photo of the white board,
 19 but both of those bits of information haven't -- they
 20 haven't registered with me what we're doing. The only
 21 time I realised that what we had done had been a problem
 22 was when I saw the evidence, when I found it on my
 23 phone, some time in November 2017.
 24 Q. You don't deny, do you, that this slide is telling
 25 everybody who cared to look at these slides, of which

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1 there was no secret at the MAG level within Celotex,
 2 I assume, that in the second test there was present in
 3 the fire barriers a 6-millimetre magnesium oxide board?
 4 A. That is what that slide is saying, yes.
 5 Q. And you knew it at the time; yes?
 6 A. Only based on looking at it then. I don't recall seeing
 7 it at the time or knowing why we had done it.
 8 Q. Was there any discussion at the MAG meeting of the
 9 6-millimetre magnesium oxide board?
 10 A. I don't -- I really don't recall. I don't know.
 11 Q. Did you tell the MAG, or did Mr Roper tell the MAG if it
 12 was him, that the 6-millimetre magnesium oxide board was
 13 placed at the thermocouples at level 2 in the rig behind
 14 8-millimetre Eternit Natura, and also at the top of the
 15 rig?
 16 A. I don't believe so.
 17 Q. Did you not point out or did Mr Roper not point out the
 18 differences between the February test and the successful
 19 May test?
 20 A. I don't know, I don't recall.
 21 Q. Did nobody actually ask the question: how come it passed
 22 in May and it failed in February?
 23 A. I don't know.
 24 Q. You don't know?
 25 A. I don't recall that question being asked.

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1 Q. Well, it would have been the essence, surely, of the
 2 item that you were to present, item 3 in the agenda, the
 3 above-18-metre discussion. Surely the only thing to
 4 discuss was why the February test had failed and why the
 5 May test had succeeded, and where to go from there; no?
 6 A. I'm sure the conversation happened. I can't recall what
 7 the detail of those conversations were.
 8 MR MILLETT: Mr Chairman, I'm really halfway through this
 9 topic, but it's a convenient moment.
 10 SIR MARTIN MOORE-BICK: Yes, and I think probably the day
 11 has gone on long enough.
 12 MR MILLETT: It has.
 13 SIR MARTIN MOORE-BICK: Mr Evans, we will break now for the
 14 day.
 15 THE WITNESS: Okay.
 16 SIR MARTIN MOORE-BICK: I am afraid I will have to ask you
 17 to come back tomorrow for some more questions.
 18 Mr Millett, can you give me any indication whether
 19 Mr Evans will require the whole day?
 20 MR MILLETT: He won't require the whole day. No, we are
 21 optimistic that we will get on to the next witness
 22 significantly before the end of the day.
 23 SIR MARTIN MOORE-BICK: Right. So he might get away at
 24 lunchtime or shortly after?
 25 MR MILLETT: Might do, but I wouldn't want to promise that.

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1 SIR MARTIN MOORE-BICK: I was just trying to see if we could
 2 help you make your arrangements for tomorrow. It's
 3 a bit indefinite, I'm afraid.
 4 THE WITNESS: That's fine, thank you.
 5 SIR MARTIN MOORE-BICK: We will see how we go. Anyway,
 6 I think you will be needed here for the morning at least
 7 and possibly just into the afternoon.
 8 THE WITNESS: Okay.
 9 SIR MARTIN MOORE-BICK: Anyway, we'll stop now. Please
 10 remember not to talk to anyone about your evidence or
 11 anything to do with it while you're out of the room, and
 12 we will look forward to seeing you at 10 o'clock
 13 tomorrow, please.
 14 THE WITNESS: Thank you.
 15 SIR MARTIN MOORE-BICK: Thank you very much.
 16 (Pause)
 17 Thank you, 10 o'clock tomorrow, then, please.
 18 Thank you.
 19 (4.35 pm)
 20 (The hearing adjourned until 10 am
 21 on Wednesday, 18 November 2020)
 22
 23
 24
 25

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