

# OPUS 2

## INTERNATIONAL

Grenfell Tower Inquiry

Day 74

November 19, 2020

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1 Thursday, 19 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 hear from another  
 5 witness formerly employed by Celotex.  
 6 Yes, Mr Millett.  
 7 MR MILLETT: Yes, good morning, Mr Chairman.  
 8 May I please now call Mr Jamie Hayes.  
 9 MR JAMIE HAYES (affirmed)  
 10 SIR MARTIN MOORE-BICK: Thank you very much, Mr Hayes.  
 11 Now, do sit down, make yourself comfortable.  
 12 All right?  
 13 (Pause)  
 14 Yes, Mr Millett.  
 15 Questions from COUNSEL TO THE INQUIRY  
 16 MR MILLETT: Mr Chairman, thank you very much.  
 17 Mr Hayes, good morning.  
 18 A. Good morning.  
 19 Q. Can I begin by thanking you very much for coming to the  
 20 Inquiry and assisting us with our investigations, we are  
 21 extremely grateful to you.  
 22 If you have any difficulty understanding anything  
 23 I'm asking you, I am very happy to put the question  
 24 again or in a different way so that you can understand  
 25 me and I can understand you.

1

1 If you feel you need a break at any point, please  
 2 let us know, we can do that. We do intend to take  
 3 scheduled breaks at some point halfway through the  
 4 morning and halfway through the afternoon.  
 5 Also, could I please ask you to keep your voice up,  
 6 so that the transcriber, who sits to your immediate  
 7 right, can get down everything you are saying. Also,  
 8 please, if you nod or shake your head, it doesn't go on  
 9 to the transcript, so please say "yes" or "no" as the  
 10 case may be.  
 11 You have made two statements for the Inquiry, and  
 12 I would like to show you the first of those, please.  
 13 It's at {CEL00010154} of 11 March 2019. You can find it  
 14 on the screen in front of you or, if you want to look at  
 15 the hard copy, it's on the desk in front of you as well,  
 16 but I will be showing you everything on the screen.  
 17 The date is 11 March 2019. Is that the first page  
 18 of that document?  
 19 A. Yes, it is.  
 20 Q. Although the front page says 12 March 2019, if you go to  
 21 page 31, please, you can see that on that page there's  
 22 a signature over your printed name.  
 23 Is that your signature?  
 24 A. Yes, it is.  
 25 Q. Now, the date there is 27 August, and it says to have

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1 been signed by instructed solicitors on 11 March 2019.  
 2 Can you just explain how that came about?  
 3 A. I believe from memory that we may have been working on  
 4 the statement -- that's me and my legal advisers --  
 5 until -- I wouldn't say the last minute, but I believe  
 6 that there was a deadline for it to be submitted by, and  
 7 I think it was finished very close to that deadline, and  
 8 so perhaps they signed it on my behalf.  
 9 Q. Right. When they signed it on your behalf, did you  
 10 instruct them to sign it, having seen and approved --  
 11 A. Absolutely, yes, that's correct.  
 12 Q. And then it was -- is this right? -- actually signed by  
 13 you on 27 August 2019?  
 14 A. That's correct.  
 15 Q. Can you just explain the delay between the March and the  
 16 August of that year?  
 17 A. I can't really explain that. I think that would have  
 18 been -- my legal team, they presented it to me and said,  
 19 "It seems that you have not signed this document and you  
 20 need to sign it yourself, and so can you please sign  
 21 this document yourself so that we can provide a proper  
 22 signed" --  
 23 Q. Yes, thank you.  
 24 Have you read this witness statement recently?  
 25 A. Yes, I have.

3

1 Q. Can you confirm that its contents are true?  
 2 A. Yes, I can.  
 3 Q. Now, there is also a second statement at {CEL00012232},  
 4 and that is the first page of that document. You can  
 5 see, Mr Hayes, that it bears a date of 5 June 2020 at  
 6 the top. Is that your second statement?  
 7 A. Yes, it is.  
 8 Q. If we go to page 5 in that document, you will see  
 9 a signature over the date of 5 June 2020. Is that  
 10 yours?  
 11 A. It is, yes.  
 12 Q. Have you read this second statement recently?  
 13 A. Yes, I have.  
 14 Q. Again, can you confirm that the contents are true?  
 15 A. Yes, I can.  
 16 Q. Have you discussed your evidence that you're going to  
 17 give today with anybody before coming here today?  
 18 A. I have discussed it in a general way with my legal  
 19 advisers.  
 20 Q. Right. But just to be clear, no one has prompted you as  
 21 to what you should say in response to questions --  
 22 A. No, definitely not.  
 23 Q. -- I might be asking you?  
 24 A. No.  
 25 Q. Right.

4

1 I just want to begin with a number of questions  
 2 about your background, if I may.  
 3 It's right that you joined Celotex in 2004, I think?  
 4 A. That's correct.  
 5 Q. That was in a temporary administrative role, wasn't it?  
 6 A. Yes, that's right.  
 7 Q. Before that, you hadn't worked in the insulation  
 8 industry at all, had you?  
 9 A. No, I hadn't.  
 10 Q. Did you have any technical experience at that point?  
 11 A. No, I didn't.  
 12 Q. And I think you got no tertiary education or technical  
 13 qualification?  
 14 A. No, that's correct.  
 15 Q. You were then offered a permanent role as a customer  
 16 services officer in the sales department; is that right?  
 17 A. That's correct.  
 18 Q. But, again, that's not or wasn't a technical position?  
 19 A. No, that wasn't.  
 20 Q. Is it right that from June 2007, you were a technical  
 21 services officer, or a TSO, in the technical team of  
 22 Celotex?  
 23 A. Yes, that's correct.  
 24 Q. As such, you were, I think, client- or customer-facing,  
 25 weren't you?

5

1 A. Yes, that's correct.  
 2 Q. Yes.  
 3 If we look at your statement, that is your first  
 4 statement, can we please go to that at pages 2  
 5 {CEL00010054/2} and 3, bottom of page 2, top of page 3.  
 6 This is paragraph 7 under the heading "The Technical  
 7 Team". You say:  
 8 "In or around June 2007, an opportunity arose for me  
 9 to move to the Technical Team at Celotex. This was not  
 10 a team with any expertise in technical product matters,  
 11 but rather a customer support team focused on practical  
 12 product application and part of the wider marketing arm  
 13 of the business. The Technical Team sat squarely within  
 14 the Marketing Department, alongside a specific Marketing  
 15 Team."  
 16 Then you go on to say in paragraph 8  
 17 {CEL00010054/3}, at the beginning there, that:  
 18 "No qualifications were required for the position in  
 19 the Technical Team."  
 20 Why was it called the technical team?  
 21 A. Because it would answer what were perceived to be  
 22 technical enquiries regarding our products. So  
 23 a typical enquiry would be, you know, "What particular  
 24 product of yours might I need for my application?",  
 25 which might be a floor or wall or a roof, and we would

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1 also do U-value calculations, which were thermal  
 2 calculations, and I think that they were perceived to be  
 3 technical questions as opposed to, for example, in my  
 4 previous role, we would field enquiries from our  
 5 purchasing customers, and their types of questions would  
 6 be, "How much does it cost? Can I have a delivery?"  
 7 And so there was a clear distinction, I guess, between  
 8 those two types of enquiries that were coming into the  
 9 business.  
 10 Q. Yes, I see.  
 11 If the team's role wasn't technical in the sense of  
 12 research and development or complex chemistry, is it  
 13 right that some of the matters on which you were  
 14 advising customers in that team called for a degree, at  
 15 least, of technical understanding?  
 16 A. Yes, I think that's fair.  
 17 Q. Yes.  
 18 Now, you say, as I've shown you, in paragraph 7 on  
 19 the page in front of you, that the technical team sat  
 20 squarely within the marketing department. Does that  
 21 mean that the development of new products was also  
 22 overseen by the marketing team?  
 23 A. Yes, it does.  
 24 Q. Is it fair to say that Celotex's business model was  
 25 really driven by the marketing team?

7

1 A. Yes, that's correct.  
 2 Q. Was the technical team ever able, in your experience, to  
 3 override the marketing department's marketing decisions  
 4 on technical grounds?  
 5 A. No.  
 6 Q. So would you say that the technical team was really  
 7 an adjunct to Celotex's marketing capabilities?  
 8 A. Yes, I would say that, and I think that the direct line  
 9 of reporting I think always ended with the marketing  
 10 director, as opposed to having a separate technical  
 11 director, for example.  
 12 Q. Yes.  
 13 Now, you were promoted to technical services team  
 14 leader, weren't you?  
 15 A. I was.  
 16 Q. When was that?  
 17 A. I believe it was January 2015.  
 18 Q. What did that involve, that new role?  
 19 A. So the business had been slightly restructured at that  
 20 time, so there had never been a technical services team  
 21 leader before, it was a created role, and so I took on  
 22 responsibility for certain day-to-day tasks in terms of  
 23 organising that team.  
 24 So, to give a couple of examples, the technical  
 25 team, which was quite a small team, would split -- each

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1 individual person would split their team between dealing  
2 with emails possibly in the morning, and then covering  
3 the telephones in the afternoon. So there was a rota,  
4 and I would create that rota.

5 To start with, that was pretty much the limit of my  
6 responsibilities, but over my time as a technical  
7 service team leader, I took on more responsibility in  
8 terms of administration of personnel, so I would, with  
9 my manager, assist with carrying out appraisals for  
10 people, and I also later on was given responsibility for  
11 signing off people's holiday requests, and also  
12 conducting return to work interviews when somebody had  
13 had a day off.

14 Q. Who was your manager? Who was your line manager at that  
15 time, or from January 2015 when you were promoted to  
16 technical services team leader?

17 A. It was Louise Garlick.

18 Q. Before that time, who was your line manager?

19 A. It was Rob Warren.

20 Q. I see.

21 As at the period 2012 to the end of 2014, who was  
22 your line manager? Was that Rob Warren throughout?

23 A. Yes, Rob Warren remained my line manager until I became  
24 technical services team leader, because I think that the  
25 same restructuring that changed Rob's role slightly was

9

1 the same restructuring at the same time that I was made  
2 technical services team leader.

3 Q. Right.

4 How did your role relate to Debbie Berger's role  
5 once she had taken over the role of product manager on  
6 1 October 2014?

7 A. So we moved into completely different reporting streams.  
8 So I would report to Louise Garlick. Louise Garlick  
9 reported to Craig Chambers, who was the CEO or managing  
10 director. I understand that Debbie reported to  
11 Paul Evans, who reported directly to Craig Chambers.

12 Q. Yes. So you were essentially in parallel with  
13 Debbie Berger?

14 A. Yes, we worked in different departments, but I would say  
15 that we were kind of peers, I guess.

16 Q. Yes. Okay.

17 I think you continued in that role, the role of  
18 technical services team leader, until you left Celotex?

19 A. That's correct.

20 Q. Just looking at your training, you say that no  
21 qualifications were required for your role, in fact any  
22 of your roles. Is that right?

23 A. That's correct.

24 Q. Given your work history before you started at Celotex,  
25 you wouldn't have acquired any technical expertise

10

1 before that, would you?

2 A. No.

3 Q. And I think it must be right then that you received no  
4 formal training for your position when you started.

5 A. That's correct.

6 Q. Given that you were being asked to offer practical  
7 advice on matters such as product application, did you  
8 have any concerns about your ability to fulfil your job  
9 description without any training?

10 A. Yes, I did at first. I think I mentioned in my  
11 statement that I felt quite overwhelmed by the position  
12 when I first joined. I was quite lucky because there  
13 was a lady that I worked with who was Burcu. She kind  
14 of took me under her wing a little bit and she would  
15 help me -- we would have break-out sessions, so if I had  
16 a question and I wasn't sure how to answer it or if  
17 I had heard terminology that I didn't understand, we  
18 might spend an informal sort of 15 minutes at her desk  
19 and she would run me through some things.

20 Q. In what years do you think that happened?

21 A. I actually don't think I started to have real confidence  
22 in my role for probably about 18 months.

23 Q. So 2006?

24 A. Yes.

25 Q. I see.

11

1 Looking at paragraph 9 {CEL00010054/3}, which should  
2 still be on the page in front of you, if you go down  
3 a little bit on that page in your statement, you say in  
4 the middle of the paragraph:

5 "I did undergo some informal training in the  
6 processes and procedures needed for my new role, whereby  
7 I would be taken through how to answer certain queries  
8 using technical data help sheets and handy guides  
9 produced by Celotex ..."

10 Who was it who produced those guides?

11 A. That literature existed in the business before I joined  
12 the technical team, and so I don't know who wrote them,  
13 but I got the impression that some were older than  
14 others. So there might have been some which were dated  
15 quite a long time ago, there might have been several  
16 years before they had been updated, and then others  
17 which were more recent. I know that there was  
18 a gentleman called Peter Gibson --

19 Q. Yes.

20 A. -- who was technical manager, I think, and he may well  
21 have had a part to play. But I'm sure that the  
22 presentation of them and formatting them, putting them  
23 together, would have also been done by the marketing  
24 team.

25 Q. Now, you say five lines down within the sentence I have

12

1 been looking at that you were taken through how to  
 2 answer certain queries.  
 3 Were those queries, in your experience, about the  
 4 suitability for a product on an external wall  
 5 construction above 18 metres?  
 6 A. No, they weren't. In fact, the vast majority of  
 7 enquiries that Celotex received, I think, throughout the  
 8 time that I was there was to do with houses. So a house  
 9 that -- you know, a semi-detached house, a detached  
 10 house, a terraced house, and very few of our enquiries,  
 11 although some of them, were to do with larger types of  
 12 buildings where those types of construction, like  
 13 rainscreen, would be more common.  
 14 Q. Were those queries from time to time about fire safety  
 15 of the products you were selling, Celotex was selling?  
 16 A. There would be questions about fire safety, but they  
 17 would be very basic, such as, "Is your product  
 18 class 1?", for example, and to answer that would be  
 19 simply to refer somebody to a product datasheet where  
 20 the properties of the board were listed and it would  
 21 confirm the product to be class 1.  
 22 Q. Yes, I see.  
 23 Now, you say in paragraph 9, as I've just shown you,  
 24 that you relied on products' technical datasheets, and  
 25 I think you refer there to an example of a datasheet and

13

1 you exhibit it. Let's go to that. It's {CEL00008506},  
 2 please.  
 3 Is this the kind of datasheet that you would use  
 4 when answering customers' queries in general?  
 5 A. I have to say that I have had a chance to look through  
 6 my statement and its exhibits, and I don't think that  
 7 this is a very good example --  
 8 Q. Right.  
 9 A. -- of a datasheet, and the fault is entirely mine, but  
 10 I think that when I was carefully proofreading my  
 11 statement prior to signing it, which I would have done,  
 12 I don't think that I checked every exhibit, and actually  
 13 I think that a much better example could have been given  
 14 of a datasheet than this one here.  
 15 Q. All right, then let's not press that point too much.  
 16 Let's move on to something which you would have  
 17 seen, I think. {CEL00000409}. This is the RS5000  
 18 datasheet produced by Celotex, and this is issue 1 of  
 19 August 2014.  
 20 Is this the sort of datasheet that you would have  
 21 been familiar with?  
 22 A. Yes.  
 23 Q. Is your evidence, in effect, that you had no technical  
 24 knowledge, but were wholly reliant on others within  
 25 Celotex for the accuracy of the technical data contained

14

1 in documents such as these?  
 2 A. That's correct. I think what I would say is that, as my  
 3 knowledge and experience grew, sometimes the technical  
 4 team were asked to assist in preparations of these  
 5 documents, mostly to do with thermal performance. So  
 6 an example would be most of our product literature would  
 7 contain U-value tables, which tells you if you have  
 8 a certain construction and you use a certain thickness  
 9 of insulation, this will give you a U-value of X. So  
 10 the technical team would assist with producing those  
 11 tables, for example, because they would be based upon  
 12 calculations that we would do, and that table,  
 13 for example, would then be slotted into the document by  
 14 the marketing team who were preparing it.  
 15 Q. Can we look at Mr Warren's witness statement,  
 16 {CEL00010043/4}, please, and I would like to look with  
 17 you at paragraph 16, at the bottom of the page there.  
 18 Mr Warren says:  
 19 "Jamie Hayes was one of the more experienced members  
 20 of the CTC team. He was assigned responsibility for  
 21 providing training to the team and in particular to new  
 22 starters."  
 23 Is that correct?  
 24 A. That is correct, and I believe that I do reference that  
 25 also in my own first statement.

15

1 Q. Then he goes on to say, about four lines down:  
 2 "I do not remember devising the remainder of the  
 3 training and did not deliver it but my assumption, based  
 4 on conversations with Mr Hayes and from looking at an  
 5 overview describing the topics to be covered, was that  
 6 it was a fairly comprehensive training programme  
 7 delivered in modules and in person to the members of the  
 8 team, which ranged from the basics of 'what is  
 9 insulation' right through to understanding all you need  
 10 to know in the technical process to be able to respond  
 11 to customer queries."  
 12 Is that accurate?  
 13 A. It became accurate. I was given responsibility for  
 14 training new members of the team, in the technical team,  
 15 and I did, for my own benefit, put together  
 16 a spreadsheet which would show the different topics that  
 17 you would cover, and this would mostly be,  
 18 for example -- I'd have one topic and it would be cavity  
 19 walls, and so we would do that on a morning, and in the  
 20 training of that morning I would go through and I would  
 21 say, "This is a cavity wall, this is very broadly how  
 22 a cavity wall is built up, this is how our product would  
 23 be used in that cavity wall, this is our datasheet, here  
 24 is how you would perform a U-value calculation for that  
 25 cavity wall".

16

1 Q. Okay, so you accept what Mr Warren says there.  
 2 When you say it became accurate, was it as he says  
 3 it was by 2012?  
 4 A. Yes, that's correct.  
 5 Q. To deliver the training that Mr Warren describes in his  
 6 statement there, you would have had to have had some  
 7 kind of technical understanding, wouldn't you, of the  
 8 matters contained in the training?  
 9 A. Yes, that's correct.  
 10 Q. Were you yourself given any training as to those  
 11 technical matters, or were those matters simply matters  
 12 that you, as it were, picked up on the job?  
 13 A. It was entirely picked up on the job.  
 14 Q. Right. Indeed, you say at paragraph 12 of your  
 15 statement, if we go to that, please, page 4  
 16 {CEL00010054/4}, that you picked up knowledge regarding  
 17 practical application of products over time. That's  
 18 your first sentence in that paragraph. So that would be  
 19 correct, wouldn't it --  
 20 A. Yes.  
 21 Q. -- looking at what we're looking at so far?  
 22 A. That's correct.  
 23 Q. You also go on to say there, a little bit lower down the  
 24 paragraph:  
 25 "At no point during my employment at Celotex did

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1 anyone ever check or test my knowledge of the product  
 2 offering. There were no specified checks that the  
 3 information we were providing to customers was correct.  
 4 Nor were there any checks that the 'industry knowledge'  
 5 I was obtaining was accurate."  
 6 You have confirmed the truth of that statement  
 7 earlier in your evidence.  
 8 Was that the case throughout your time at Celotex?  
 9 A. Yes, it was the case.  
 10 Q. Now, let's go to {CEL00008515}, please. This is  
 11 an internal Celotex draft document, and the reason I say  
 12 that is that, if you look at the top of the page, under  
 13 the words "Technical Briefing", the first bullet point  
 14 says "Draft".  
 15 Was it a draft or was it a final document, do you  
 16 think?  
 17 A. So I wrote this document, and it was never a formal  
 18 Celotex document, it was produced by me to assist me  
 19 with training people, and so I would have put the word  
 20 "Draft", and I think the reason I put the word "Draft"  
 21 is because it was never a formal document, it was  
 22 a document that I used.  
 23 Q. Yes, thank you.  
 24 You can see that it says:  
 25 "Introduction to fire regulations and standards.

18

1 "Incorporates buildings above 18m - requirements of  
 2 compliance with fire regulations.  
 3 "Technical Briefing."  
 4 A. That's correct.  
 5 Q. And although it's a draft, you used it, I think is what  
 6 you're saying.  
 7 A. Yes.  
 8 Q. And you drafted it.  
 9 If we go to the bottom of the page, there's the  
 10 logo, as we can see -- we can't quite see it on the  
 11 screen. I think you can just about see it, it says  
 12 "CTC". That's the Celotex technical centre, I think,  
 13 isn't it?  
 14 A. That's correct.  
 15 Q. And you sat in the Celotex technical centre. Who else  
 16 did, in 2012, 2013 and 2014?  
 17 A. So some people came and went, so -- but I would do the  
 18 best to --  
 19 Q. Sorry, I should perhaps narrow it down a bit.  
 20 Who were the main players throughout that period in  
 21 that team?  
 22 A. So there was a gentleman called Sean Whelan, there was  
 23 myself, there was Debbie Berger, there was a gentleman  
 24 called Tom Elwell.  
 25 Q. Yes.

19

1 A. I believe there was a gentleman called Richard Gifford,  
 2 although I'm not 100% sure when Richard joined, and  
 3 there was a gentleman called Jeremy Suttle.  
 4 Q. Yes, and we've seen his name in later documents.  
 5 If we go to page 2 in this document {CEL00008515/2},  
 6 we can see in the header that it's marked on the top  
 7 left "JH", and I think that tells us you drafted it.  
 8 A. That's correct.  
 9 Q. And this is "Version 2 (draft) 26.10.2010".  
 10 Just looking at it briefly -- we will consider the  
 11 content together in a moment -- staying on this page,  
 12 these are the contents of the presentation, and you can  
 13 see that it deals with standards of fire resistance for  
 14 insulation, national standards, European standards and  
 15 Scottish standards, and then requirements for buildings  
 16 above 18 metres in height, external walls, at page 7.  
 17 If you go to page 8 {CEL00008515/8}, you can see  
 18 there's a reference about a quarter of the way down to  
 19 "Technical Services Information Bulletin 26", and there  
 20 are a number of parts of that.  
 21 Bulletin 26, does that tell us that there were  
 22 historically a large number of bulletins, namely 25,  
 23 produced by this department?  
 24 A. So technical services information bulletin 26 is  
 25 a document which I inherited. So when I took over, when

20

1 I went into the technical services team, I took over the  
 2 desk of somebody who had left, and I believe that  
 3 name -- that person was called Philip Eden, and  
 4 I inherited a black folder, and in that folder were some  
 5 technical services information bulletins, including  
 6 number 26, and I think there were some other ones as  
 7 well, although I don't think that the set was complete  
 8 necessarily.

9 Q. Right.

10 A. But I don't believe that any of those bulletins had been  
 11 produced by the CTC, if you like, which is the technical  
 12 department where I worked. I believe that they had all  
 13 been produced by senior people within the business, and  
 14 I actually -- I'm sure I exhibit this document and it  
 15 will say who wrote it, but I believe it was  
 16 Peter Gibson, who was the technical manager for Celotex,  
 17 rather than somebody who sat within the technical team.

18 Q. I see.

19 If we look a little bit lower down underneath that  
 20 heading, it refers to the Building Regulations and,  
 21 specifically, section B4 of Approved Document B, and the  
 22 reference there to the requirement of limited  
 23 combustibility. You can see that in the second  
 24 paragraph.

25 A. Yes.

21

1 Q. In the third paragraph under the heading "Technical  
 2 Services Information Bulletin" you can see it says the  
 3 position in Scotland as well, and in both paragraphs it  
 4 says that the requirement is for the use of  
 5 a non-combustible insulation product such as mineral  
 6 wool. You see that?

7 A. Yes.

8 Q. So was it clear to you and to those that you were  
 9 training, so far as you were aware, that one of the  
 10 routes to compliance with Approved Document B for  
 11 insulation on buildings above 18 metres was to ensure  
 12 that the material was non-combustible?

13 A. Yes, I would have understood that. Just to clarify  
 14 that, I think the understanding in the team was -- we  
 15 had this document, and that document I believe is --  
 16 I beg your pardon, we had technical services information  
 17 bulletin 26, and I think that, to produce this section  
 18 of this document, I've effectively cut and pasted it in.

19 Q. Right.

20 A. But it's not something that we would think about when we  
 21 did our jobs, because when people came to us, and they  
 22 did, and said, "Do you have a product which is suitable  
 23 for a building above 18 metres?" or "Do you have  
 24 an alternative product to Kooltherm K15 for use in a  
 25 tall building?", the answer was always, "No, we don't,

22

1 sorry", and then they would move on.

2 So, yes, I had an awareness of this and had read and  
 3 understood that document, but it was not something that  
 4 we were required to understand the technicality of on  
 5 a day-to-day basis.

6 Q. I follow. So the answer is: when you were asked for  
 7 a material for use above 18 metres, the answer was no,  
 8 and you didn't really need to know why no, but you knew  
 9 it was no?

10 A. Yes.

11 Q. Then if we look underneath that, it says:  
 12 "Alternative compliance method:  
 13 "An alternative method of compliance with these  
 14 regulations is to meet the performance criteria given in  
 15 BR135 'Fire performance of external thermal insulation  
 16 for walls of multi-storey buildings' (2003 edition)  
 17 using data from full scale fire testing to BS 8414-1 or  
 18 BS 8414-2. This specifies limits for both external and  
 19 internal fire spread defined by a maximum temperature  
 20 rise in given time period."

21 "BR 135 is the basis on which Kingspan are currently  
 22 able to obtain specifications for Kooltherm, despite the  
 23 fact that the product is combustible. We believe that  
 24 the tested systems incorporate fire barriers to limit  
 25 the spread of fire through the air cavity behind the

23

1 rainscreen.

2 "Celotex boards have NOT been tested to this  
 3 standard but FR4000 [but corrected to 5000] could  
 4 potentially meet the standard if it were to be tested.  
 5 At this point in time we have decided not to pursue this  
 6 line.

7 "Summary

8 "Celotex boards can not be used in any external wall  
 9 constructions if the building is above 18m in height.  
 10 [And then this is in italics] This applies to all areas  
 11 of walls, even those below 18m."

12 There are a different number of ways of emphasising,  
 13 but it's crystal clear from that, isn't it, that at this  
 14 point, October 2010, the alternative method of  
 15 compliance set out in this document was also not  
 16 available to Celotex?

17 A. That's correct.

18 Q. Yes.

19 If you go down a little bit further on to the next  
 20 page {CEL00008515/9}, please, you can see there, this is  
 21 a heading of "Timed fire resistances". A little bit  
 22 lower down that page, three-quarters of the way down the  
 23 page -- there is quite a lot of technical text, and I'm  
 24 summarising it, but that was about other tests under  
 25 BS 476, wasn't it?

24

1 A. Yes, this was not related to the above-18-metre test.  
 2 Q. No.  
 3 Were you aware at this time of something called  
 4 national class 0?  
 5 A. Yes, I was.  
 6 Q. And you were aware that this was entirely distinct from  
 7 the requirements for buildings above 18 metres as they  
 8 existed at that date?  
 9 A. Yes, I was.  
 10 Q. And you were aware that class 0 was something very  
 11 different from the concept of non-combustible or limited  
 12 combustibility?  
 13 A. I knew that they were different tests and that they  
 14 weren't necessarily interchangeable.  
 15 Q. Yes.  
 16 Now, can we go to {CEL00008500}, this is a copy of  
 17 a training pack that you, I think, delivered, the same  
 18 document again, and if we go to page 11  
 19 {CEL00008500/11} -- this is a copy that Debbie Berger  
 20 has disclosed -- this is "Version 1 (draft) 25.10.2010",  
 21 and there is a quiz:  
 22 "Training module: Fire standards and regulations;  
 23 incorporating buildings greater than 18m height."  
 24 And then there is a note:  
 25 "The quiz is designed to demonstrate comprehension

25

1 of the training session and not the ability to memorise  
 2 information."  
 3 Then if you go to page 14 {CEL00008500/14}, these  
 4 are the questions, and they're questions about why  
 5 Celotex products can't be used above 18 metres and what  
 6 test meant that Kingspan could market K15 for use above  
 7 18 metres.  
 8 I've summarised those questions there, but you can  
 9 see what they are. Am I right in my summary?  
 10 A. Yes, that's correct.  
 11 Q. We can see the answers at slide 9 {CEL00008500/9}, and  
 12 if you go to slide 9 or page 9 of this document, here  
 13 are manuscript answers to the quiz. There is a date at  
 14 the top: 5 November 2010.  
 15 Was this an actual training session, do you think?  
 16 A. Yes, so I believe that I had also given some training in  
 17 a much, much sort of reduced form to area sales managers  
 18 who came into the business, and this is something that  
 19 I had been asked to do by Chris King, and he asked me,  
 20 in fact, I believe, to do some simple quizzes with area  
 21 sales managers to check their understanding of what they  
 22 had seen.  
 23 I don't think that it was necessary for the CTC  
 24 members to undertake the quiz. I think that Debbie has  
 25 done it probably for a bit of fun, because I was --

26

1 I would have trained Debbie in terms of the CTC, and so  
 2 she's also taken the quiz, but it wasn't, I don't  
 3 believe, something that you had to do or a standard that  
 4 you had to meet. I think we've done it for a bit of  
 5 fun.  
 6 Q. Yes, and at page 10 {CEL00008500/10}, we can see the  
 7 answers to the four questions which represented the  
 8 slide I showed you before, and particularly question 14.  
 9 The answer to question 14 is:  
 10 "The fire test allowing Kingspan to use their  
 11 phenolic product in 18m and taller buildings is  
 12 BS 8414-1 or BS 8414-2."  
 13 So that was the answer.  
 14 Did you know at the time, or did you think at the  
 15 time, that Kingspan had actually passed both of those  
 16 two parts of BS 8414?  
 17 A. No, I don't believe that I did.  
 18 Q. Which did you think they'd actually passed?  
 19 A. I don't think at this time, and I think this is dated  
 20 2010, I would have given that any thought. So the  
 21 reason there's a reference to both of those is probably  
 22 from the technical bulletin, where it references both of  
 23 those tests as being something that you could do, but  
 24 I don't think at that time I would have looked at  
 25 whether Kingspan had done one test or another test.

27

1 Q. If we just go back to page 9 {CEL00008500/9}, just  
 2 finally on this document, one of the answers to the quiz  
 3 questions related to class 0, and if you go to answers 7  
 4 and 8, you can see she's written down:  
 5 "Surface spread of flame - BS 476 - part 7."  
 6 Then under answer 8:  
 7 "Fire standard class 0 - BS476 parts 7 & 6, surface  
 8 spread of flame & propagate."  
 9 I'm assuming that you and she and those you were  
 10 teaching understood at least that much.  
 11 A. Yes.  
 12 Q. That class 0 had these two parts to it.  
 13 A. I think, from memory, that was explicit on the Celotex  
 14 literature. So if you looked at a product datasheet for  
 15 FR4000, for example, I think there would be a section  
 16 and it would say "Fire performance", and it would say  
 17 "BS 476-6 and BS 476-7".  
 18 So, sorry to go on, but yes, the short answer is  
 19 there was an understanding that class 0 was formed of  
 20 those two tests.  
 21 Q. Yes, and we will come back to this question very shortly  
 22 again when looking at a later technical bulletin.  
 23 Before I do that, can I take a sideways visit and  
 24 ask you some questions about the corporate culture  
 25 within Celotex.

28



1 You have already agreed with me, I think, that  
2 Celotex was largely marketing-led at the time you were  
3 there.

4 A. Yes.

5 Q. If we go back to your statement on page 6  
6 {CEL00010054/6} at paragraph 16, if you look at that at  
7 the top of the page under the heading "Saint Gobain",  
8 you refer there to the acquisition of Celotex by  
9 Saint-Gobain in 2012, and you say:

10 "This acquisition changed some of the processes  
11 within Celotex, including changes to health and safety  
12 on production line, environment and facilities."

13 Then in the last sentence you say:

14 "In my experience the acquisition also brought about  
15 a change in culture, particularly in the sense that  
16 there appeared to be increased financial pressure to  
17 develop new products applied to Celotex from  
18 Saint Gobain."

19 Then you go on to say:

20 "Even before this acquisition Celotex was largely  
21 marketing led given that those individuals at the top of  
22 the business had mainly originated from the Marketing  
23 Department. Celotex used to be owned by private equity  
24 group AAC Capital Partners and so the drive for profit  
25 making and increasing the company's share price had been

29

1 systemic in the Celotex culture for some time. However,  
2 it seemed as though this culture became heightened once  
3 Saint Gobain became involved."

4 Now, when you say Celotex used to be owned by  
5 a private equity group, AAC Capital Partners, et cetera,  
6 did you get the sense at that time -- and that's up to  
7 2012, when the acquisition took place -- that the drive  
8 for profit was also a drive for revenues?

9 A. Yes, I don't think it was a secret from anybody in the  
10 business at any level that the intention was that the  
11 company under AAC -- that the goal of the management at  
12 that time was to make the business as profitable as  
13 possible in terms of how it would look on a balance  
14 sheet, and so to increase its value for somebody who was  
15 to buy it afterwards.

16 Q. Yes.

17 Then you go on to say, after the reference to  
18 conversations you had, that:

19 "... Saint Gobain had asked for a budget for  
20 increasing profits and that at least 15% of this  
21 increase would need to be attributed to new products.  
22 I remember thinking we were not allowed to simply sell  
23 more of our existing products to increase profits. For  
24 me this meant that there was a drive for innovation and  
25 a sense of pressure to increase profits at Celotex."

30

1 Is it your recollection that Celotex became even  
2 more marketing-driven following the acquisition by  
3 Saint-Gobain in 2012?

4 A. Yes, I think that's fair.

5 Q. What made you feel that there was an increased pressure  
6 to develop new products?

7 A. Well, primarily this conversation, I believe, and as it  
8 says there, they were talking about -- and I think  
9 I also talk a bit later about hearing a conversation  
10 regarding the budget of Celotex and how it would have to  
11 be presented to Saint-Gobain in Paris, and it was  
12 referenced that they had to increase profits, and also  
13 that a certain percentage of that profit must come from  
14 new products.

15 Q. How did that pressure manifest itself on you personally  
16 at the time?

17 A. I don't think that in my role there was a personal  
18 pressure on me as an individual to do my role  
19 differently, and so it would have been the effect I saw  
20 on others, for example as part of the above-18-metre  
21 project.

22 Q. So what did you observe of the effect of this  
23 requirement from on high on what others in the business  
24 were doing around you?

25 A. So, to give an example -- and I know we'll come on to

31

1 this -- but after the first 18-metre test failed,  
2 a second test was arranged incredibly quickly, and  
3 although it didn't seem that strange to me at the time,  
4 I look back on that now and think it's almost  
5 unbelievable that I think only a few months passed  
6 between the failure of a major test and how quickly  
7 a second test was arranged, authorised, paid for, and  
8 not to mention the fact that there were -- you would  
9 have to actually arrange to build a rig, which is to say  
10 have all the materials, have someone construct it, and  
11 so how quickly they turned around between 1 to 2 I think  
12 illustrates quite well that they were not prepared to  
13 wait any longer than was humanly possible to progress  
14 that project, and I guess the ultimate goal of that  
15 project was to have a product which could be sold to  
16 increase profits.

17 Q. Right. So, in a nutshell, are you saying the May 2014  
18 second test of RS5000 which took place was really  
19 a manifestation in its clearest form of the culture  
20 which you describe at paragraphs 16 and 17 of your  
21 statement?

22 A. Yes.

23 Q. Now, I'm going to ask you some questions next about your  
24 understanding of Celotex products in general.

25 Can we start with {MAX00000216}, please, this is the

32

1 datasheet for Celotex FR5000, issue number 2,  
2 January 2012, and if you look at the top right-hand  
3 corner of the document you can see that.

4 Now, FR5000 is or was a PIR board, wasn't it?

5 A. Yes.

6 Q. Did you understand that that meant that it was not,  
7 therefore, a product of limited combustibility?

8 A. Yes, I did.

9 Q. And therefore it could not be used on buildings above  
10 18 metres?

11 A. Yes.

12 Q. We can see from the datasheet in two places, the first  
13 paragraph and the fourth bullet point, that it's  
14 described as having class 0 fire performance. In that  
15 fourth bullet point it says:

16 "Has Class 0 fire performance throughout the entire  
17 product in accordance with BS 476."

18 What did you understand the significance of FR5000  
19 having class 0 to be?

20 A. I understood that meant it had received a pass in two  
21 separate BS 476 fire tests, 476-6 and 476-7.

22 Q. Yes. So you understood that the result of success in  
23 those two tests was that you got a class 0  
24 classification for this product?

25 A. Yes.

33

1 Q. What was the significance to Celotex in marketing the  
2 product of that product having a class 0 classification?

3 A. I believe that Celotex introduced the FR4000 range,  
4 which was the first time that it had ever had a class 0  
5 product, and that the driver for that was that Celotex  
6 had PIR products and it competed against lots of other  
7 PIR products in the market, but that their main  
8 competitor, if you like, was Kingspan, and Kingspan's  
9 products were made of phenolic foam, and Kingspan's  
10 products were seen to be technically superior to all PIR  
11 products, because they had a better thermal performance  
12 and they also had a better fire performance.

13 So I believe that what the business wanted to do  
14 when it introduced the 4000 range was to step up its  
15 game and to, one, have a product which was or could be  
16 marketed as being more equivalent to Kingspan in terms  
17 of its technical properties, but also differentiate  
18 itself from other PIR.

19 Q. Right.

20 A. And I think that there were three key ways that they  
21 wanted to do that: one was to increase or improve its  
22 lambda value so that it would be -- I think at that time  
23 it would have gone from 0.023 to 0.022, which would have  
24 been better than all of its other competitors in PIR;  
25 that it would have a class 0 fire performance, which

34

1 would match that of Kingspan's products; and that it  
2 would also have an improved thermal performance of its  
3 foil facers, and I think that's why they introduced it,  
4 and it was supposed to be kind of a premium PIR,  
5 I think.

6 Q. Leaving aside the benefit of having class 0 as a way of  
7 keeping up with or competing with Kingspan, my question  
8 was a slightly different one.

9 A. Sorry.

10 Q. What would class 0 signify to a buyer? What would it  
11 allow the buyer to do which, without class 0, it  
12 couldn't?

13 A. Nothing, I don't believe. I'm not aware of any  
14 application that Celotex was offering products into  
15 where class 0, or in fact fire performance in general,  
16 had any relevancy. So I believe that the -- that giving  
17 the product class 0 was solely a marketing proposition.

18 Q. Right. Okay.

19 Maybe you can't help me, but what did, if you look  
20 at the fourth bullet point down, the statement "Class 0  
21 fire performance throughout the entire product in  
22 accordance with BS 476" signify?

23 A. I can remember a conversation at Celotex, and I know --  
24 I think that Lizzie Seaton was in the room and perhaps  
25 somebody else -- I'm sure there would have been someone

35

1 else -- and there was I'm sure a section in Kingspan's  
2 literature where it said "class 0 for the core only" or  
3 "core only" or "class 0 for the foam core", and I think  
4 that there was an impression that that was not the  
5 correct way that you were supposed to test it, and that  
6 the reason that they had qualified that is because  
7 actually what you were supposed to do is test the  
8 product as you bring it to market.

9 So if you have a board which is comprised of a foam  
10 core and has a foil facer at the top and a foil facer at  
11 the bottom, that forms a complete product as you're  
12 selling it, and so therefore you should take that  
13 complete product, including all of its elements, and  
14 test it like that. And so I think that -- and I might  
15 be wrong -- when Celotex tested to class 0, they tested  
16 it as it was, which is to say with the foil facers  
17 intact, and so you put that in and you receive your  
18 result.

19 So I thought it was supposed to be kind of a poke in  
20 the eye to Kingspan to say, "We've tested class 0  
21 properly".

22 Q. I see. I mean, technically speaking, did the concept of  
23 class 0 throughout the entire product actually have any  
24 real meaning?

25 A. No, I don't -- I mean, I can only assume that if you

36

1 tested something to class 0, you would submit your  
2 samples to the test body, they would do whatever tests  
3 were correct to do, and so, actually, to say it's  
4 throughout the product is -- again, is just a marketing  
5 proposition, I think.

6 Q. Right. Okay.

7 Either way, you were I think aware, as you have told  
8 us, that even though FR5000 had class 0, whatever  
9 "throughout the entire product" might or might not mean,  
10 you knew that it couldn't be used in buildings higher  
11 than 18 metres?

12 A. Yes, that's correct.

13 Q. And you were therefore aware that there were  
14 requirements which products which could be used above  
15 18 metres had to meet?

16 A. Yes.

17 Q. Yes.

18 Now, at paragraph 25 of your statement  
19 {CEL00010054/9}, you refer to the development of FR5000  
20 and a product called FR4000. Just have 25 up on the  
21 screen. I'm not going to read it all out to you, but  
22 that's where you deal with this, and you say that the  
23 thermal conductivity of this product was improved, which  
24 then resulted in FR5000.

25 So was FR4000 effectively a predecessor to FR5000?

37

1 A. Yes. So my understanding was that there was no  
2 difference at all in that product from 4000 to 5000,  
3 apart from the fact that it went from a lambda value of  
4 0.022 to a lambda value of 0.021. So it hadn't changed  
5 in respect of its fire performance, for example.

6 Q. Right.

7 Now, at paragraph 28 of your statement at page 9  
8 {CEL00010054/9}, you say -- and, again, I'll  
9 summarise -- that RS5000 was not a new product but was  
10 a re-branding of FR5000 to be used above 18 metres.

11 A. Yes, that's correct.

12 Q. And therefore there were no changes to the chemical  
13 composition that you knew about as between FR5000 and  
14 RS5000.

15 A. That's correct.

16 Q. The only difference, I think, is that unlike FR5000,  
17 RS5000 had passed, or purportedly passed, a BS 8414  
18 test.

19 A. That's correct.

20 Q. To put it another way round, actually this same  
21 insulation board which you had called FR5000 had been  
22 subjected to that test and then renamed RS5000 so as to  
23 be able to get into the above-18-metre market.

24 A. That's correct.

25 Q. Now, I want to ask you some questions about your

38

1 involvement in the 18-metre project.

2 In your statement -- I don't think we need to see  
3 it, it's paragraph 26 at page 9 {CEL00010054/9} -- you  
4 say that Jonathan Roper was given the task of  
5 the development of a product that could be used above  
6 18 metres. If you want to look at it, we can certainly  
7 do that. Page 9, paragraph 26. Let's have that on the  
8 screen. You say:

9 "JR was a Product Manager within the Marketing Team.  
10 In late 2012, early 2013, he was tasked with the  
11 development of a product that could be sold in the above  
12 18 metre market (RS5000), as well as a portfolio of  
13 other products and the management of how these products  
14 would be presented to the market."

15 A. Yes.

16 Q. Do you remember who gave him that task?

17 A. I believe he would have been set that task by his  
18 manager, who was Paul Evans.

19 Q. At paragraph 22, if you go -- well, actually, you can  
20 see it here. You say:

21 "JR was young at the time ... and had only been  
22 employed by Celotex for around 2 years; he had joined  
23 straight from university before he was tasked with this  
24 role and therefore had limited experience."

25 Did it occur to you to ask the question of anybody

39

1 why it was that somebody so young and so inexperienced  
2 was being given this task, given the importance of the  
3 task?

4 A. No, I didn't.

5 Q. Did it cross your own mind? Did you ask yourself:

6 I wonder why Jon Roper's got that job?

7 A. I think he was the only person who could have been given  
8 that job, because development of products was always  
9 managed by the marketing team and by product managers,  
10 and I think I understand that he was the only one at  
11 that time.

12 Q. You mean the only one available?

13 A. The only one completely, I think. I might be wrong,  
14 I apologise if I am, but it may have been that he  
15 actually comprised the entirety of product managers at  
16 Celotex.

17 Q. I'm not quite sure I understand that. You say --

18 A. I beg your pardon. So --

19 Q. -- he actually comprised the entirety of product  
20 managers. Do you mean he was the only person --

21 A. He was the only person who bore the job title product  
22 manager.

23 Q. I follow.

24 A. Sorry.

25 Q. Which I think he got as soon as he joined; is that

40

1 right?

2 A. No, I think that Jon was promoted to be a product

3 manager. I think he -- when he joined, I think I said

4 he had a mainly administrative role, and I believe that

5 was about taking sales data that he was given and

6 putting it into a spreadsheet for use by his manager.

7 Q. Yes. In fact, I think he was assistant product manager

8 at first, he had that title.

9 A. Okay.

10 Q. Turning to Mr Evans, can I just show you paragraph 22 of

11 your statement, while we've got it on the screen, or got

12 that document at least on the screen, at the bottom of

13 page 7 {CEL00010054/7} and top of page 8.

14 At page 7, paragraph 22, you say that, in the third

15 line:

16 "PE [Paul Evans] was young when he joined Celotex

17 and worked under CK [Chris King]."

18 A. Yes.

19 Q. "CK had a certain way of working, that I would describe

20 as aggressive and he had a reputation for taking

21 shortcuts. PE had no construction experience and as far

22 as I was aware, he picked up everything he knew from

23 CK."

24 When you say that there, do you mean that he picked

25 up everything he knew about Celotex and the insulation

41

1 business from Chris King?

2 A. Yes, I would.

3 Q. Are you implying as well that he shared the traits that

4 you have described that Mr King had?

5 A. I don't think he shared the personality traits of

6 Chris King, but I think in terms of how he would have

7 approached his work in terms of managing his department

8 and setting its goals, undertaking its tasks, I think he

9 would have got that from Chris King. But they were

10 different people in terms of their personality.

11 Q. In the way in which Mr Evans approached his work, would

12 you describe him as aggressive and --

13 A. No, sorry --

14 Q. -- taking shortcuts?

15 A. -- I don't mean it as aggressive. So, no, I don't mean

16 he's an aggressive personality. I don't think he got

17 that from Chris King. He wasn't --

18 Q. No, leave aside his personality, but his style of

19 management, was that aggressive? Punchy?

20 A. No, I don't think so. I'm just trying to explain myself

21 clearly.

22 I guess in the way that projects were run at Celotex

23 to bring new products to market, I think he would have

24 taken that from Chris King, as in things should be done

25 quickly. The most important things are having a product

42

1 which is saleable to the market, for example, which

2 I think were things that he would have got from

3 Chris King.

4 I don't think in terms of his personal style, which

5 is to be aggressive, I don't think he took that from

6 Chris King.

7 Q. No, I understand.

8 You go on to say of Mr Evans in the last sentence

9 there:

10 "Effectively, he was promoted to Marketing Director

11 without a lot of experience and in practice was able to

12 make decisions within Celotex without any real checks or

13 balances."

14 Was that a concern to you at the time?

15 A. No, it wasn't.

16 Q. If we go then to paragraph 26 again at page 9

17 {CEL00010054/9}, and come back to where we were before,

18 you say there, after the reference to JR, in the last

19 sentence:

20 "... JR reported directly to the Head of Marketing,

21 PE, who in turn reported to CC [Craig Chambers]. It was

22 therefore my understanding that PE and CC oversaw or

23 agreed to all final decisions that were made with

24 respect to RS5000."

25 What was that understanding based on?

43

1 A. I think that understanding is based upon the fact that

2 I helped Jon with certain tasks on the 18-metre project,

3 and I was involved with and witnessed conversations

4 between all of those individuals with regards to the

5 18-metre project, and from the things that I saw and the

6 recollections that I have, I don't think that Jon would

7 have had any autonomous decision-making with respect to

8 that project and that he would have had to run

9 everything past Paul.

10 I know that Craig was closely following that

11 project, which was again a view that I formed from

12 conversations I witnessed and also from, you know, my

13 conversations with Jon, and my understanding was that

14 Jon wouldn't have been given any decision-making power

15 and he would not have been able to autonomously make any

16 decision -- any important decision, I would say -- with

17 regards to RS5000 or the project to develop it.

18 Q. Yes. Thank you.

19 Now, sticking on this page, if you look a little bit

20 lower down the page to paragraph 28, Mr Hayes, you will

21 see there that in the last three lines you say:

22 "JR's responsibility for developing RS5000 was

23 therefore a significant responsibility, given that

24 Celotex's ability to meet Saint Gobain's targets seemed

25 to be heavily reliant on the success or failure of this

44

1 product."

2 Were you surprised that Mr Roper was given the task

3 of developing it, given his relative inexperience and

4 youth?

5 A. No, I don't recall thinking that at the time.

6 Q. Did you ask yourself at the time whether or not he was

7 tasked with doing what you say there because he was

8 inexperienced and would be therefore less likely to

9 challenge the decision-making?

10 A. That is not something that I would have thought at the

11 time.

12 Q. Right.

13 If you go to paragraph 32 of your statement at

14 page 11 {CEL00010054/11}, two pages on, please, you say

15 in the last line there:

16 "There was significant pressure on JR from PE at the

17 top of the business to develop the product and do so

18 quickly."

19 What made you think that?

20 A. So there were, I guess, a number of things that

21 I witnessed which would inform that. I gave an example

22 a moment ago about the length of time between the first

23 and the second test, so that was one example. The

24 conversations that I witnessed about how they needed

25 a product which could be considered to be a new product

45

1 in order to meet the budget in terms of certain amounts

2 of profit coming from things which were considered to be

3 new products. And I don't think, to my knowledge, that

4 there were other projects running at the time which

5 would have allowed to have met that target with

6 different products, for example. So it was kind of

7 RS5000, it has to be this product which is going to help

8 us to achieve that goal.

9 And also just the level of interest that I saw. So

10 an example would be the 18-metre update meeting, which

11 I suspect we'll come to, where Craig Chambers was at

12 that meeting and he was, you know, very interested in

13 that product -- in that project, I beg your pardon, and

14 very involved in the discussions at that meeting, and

15 that showed to me, because Craig was the managing

16 director, that it was very important to the business.

17 Q. Yes.

18 It's right, I think, that in early 2013,

19 Jonathan Roper approached you and asked for your help in

20 developing RS5000, or what was to become RS5000. Is

21 that right?

22 A. That's correct.

23 Q. Although I think you say you weren't the most

24 knowledgeable or longest-serving member of the team,

25 presumably by that stage you had sufficient knowledge of

46

1 the FR product, FR5000, to be able to help him in the

2 development of RS5000; is that correct?

3 A. Yes, so I think that -- yes, that is correct.

4 Q. You say at your paragraph 29 of your statement on

5 page 10 {CEL00010054/10}, if we can go back a page:

6 "My involvement in the development of RS5000 was in

7 my capacity as a TSO."

8 Does that mean that you had more technical expertise

9 than Mr Roper?

10 A. I think in some areas, yes, that's fair.

11 Q. What areas?

12 A. So obviously I had been in the business longer than Jon,

13 and my role had been in the technical department, so in

14 areas such as the thermal performance of our products,

15 their practical application in certain constructions,

16 and the fact that I was able to do thermal calculations

17 for our products I think would all have been things

18 where I had a greater level of knowledge than Jon did.

19 I think that in terms of the fire performance of our

20 products and in terms of fire testing of our products,

21 I had never been involved in a project to develop

22 a product before, I'd never been involved in fire

23 testing, and my knowledge about the regulations to do

24 with 18 metres were really solely based upon the

25 technical bulletin which we looked at earlier, which

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1 said that, you know, effectively we don't have a product

2 for this market.

3 So I think it's fair to say that in many areas my

4 knowledge about our products and their application would

5 have been greater than Jon's, but in terms of, you know,

6 fire performance, fire testing, for example, I think we

7 would have been starting off pretty much at the same

8 place, which is at the beginning of the road.

9 Q. Yes.

10 Now, we've seen earlier your October 2010 training

11 document, and I showed you some of that before. We

12 might be able to take this a little bit more quickly.

13 Can we take it that the information set out in that

14 training document was still in your mind and known to

15 you when you became involved in early 2013 with Mr Roper

16 on the development of RS5000?

17 A. I'm not sure I would say it was at the front of my mind.

18 I obviously had the level of knowledge which is outlined

19 in that document.

20 Q. Yes.

21 A. It wasn't knowledge that we put to use every day,

22 because a lot of the enquiries which we received were to

23 do with low-rise buildings, which is to say houses, and

24 so queries regarding above 18 metres were relatively

25 rare, although they did come through with a degree of

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1 regularity .

2 Q. Yes.

3 Let's see if I can take this a little bit more  
4 shortly. You told us you were familiar with the fact  
5 that there was a distinction between class 0, on the one  
6 hand, and the concept of limited combustibility on the  
7 other; you knew that?

8 A. Yes.

9 Q. You were familiar enough with the Building Regulations,  
10 and particularly Approved Document B, to know that there  
11 was an alternative route to compliance if you were going  
12 to apply insulation above 18 metres, namely a BS 8414  
13 test in accordance with what was, in early 2013, BR 135  
14 edition 2 from 2003?

15 A. Yes.

16 Q. And you were familiar, I think, with the requirements of  
17 BR 135, were you, namely that you knew that if you did  
18 a test under BS 8414, it was a full system test?

19 (Pause)

20 A. Yes, and I think that would have -- even if that wasn't  
21 front of my mind, I think we quickly understood that in  
22 terms of the project as well.

23 Q. Did you know or come to understand it that, under  
24 BR 135, the test that you did under BS 8414 in order to  
25 satisfy the BR 135 criteria would only apply to the

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1 system as tested?

2 A. Yes.

3 Q. Did you understand that the fire performance of the  
4 complete external cladding system was of critical  
5 importance?

6 A. That's something that would become apparent during the  
7 course of the project.

8 Q. At what point did that become apparent to you?

9 (Pause)

10 A. So our knowledge increased as we went through the  
11 project, but an example which, again, I'm sure that we  
12 will come to would be: we had a meeting with a company  
13 called Sotech, and they talked to us about some testing  
14 that they had undertaken with Kingspan.

15 Q. I see. So the meetings in June and October 2013 with  
16 Sotech, the Eggintons?

17 A. I think that I was only at one of those meetings.

18 Q. Yes, we'll come to that. But I think in general terms  
19 you accept that, certainly at latest during the course  
20 of 2013, you came to learn that fire performance of the  
21 complete external cladding system as a system was of  
22 critical importance if you were going to do an 8414  
23 test?

24 A. Yes.

25 Q. Yes.

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1 Now, can we go to paragraph 39 of your statement,  
2 please, on page 13 {CEL00010054/13}. You say there:

3 "Our basic understanding at this point was that in  
4 order to be compliant under the relevant Building  
5 Regulations for a building above 18 metres it was  
6 possible to either: use materials of 'limited  
7 combustibility' (defined within the regulations) for all  
8 elements of the cladding system, this ruled out PIR and  
9 phenolic foam; or successfully complete the Test.  
10 Kingspan had therefore taken the latter option and  
11 passed the Test. It was decided that we would also  
12 undertake the Test and so we began seeking help with the  
13 components of our test rig."

14 Does that accurately and fully set out your  
15 understanding of the technical options facing Celotex in  
16 launching RS5000?

17 A. Yes.

18 Q. So putting it simply, you had to pass the BS 8414 test  
19 and meet the BR 135 criteria in relation to the system  
20 that you tested?

21 A. Yes.

22 Q. From what you knew at the time, did you think that  
23 others working with you on the RS5000 launch were aware  
24 of what you have set out there?

25 A. Yes.

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1 Q. Then can we look at BR 135, finally on this, just to get  
2 the absolute words in front of you and to get you to  
3 confirm them. This is at {CEL00000584}, please. This  
4 is a copy of the third edition of BR 135 which was  
5 published in the January of 2013, and we've seen from  
6 earlier evidence from Mr Roper that he became aware of  
7 it within Celotex not long afterwards, but during,  
8 I think, the May of that year.

9 Did you become aware of this edition at about that  
10 time as well, do you think?

11 A. Yes, I think that within Celotex or given to us -- I'm  
12 not sure who, possibly by Rob -- there was a copy of the  
13 second edition, and I think we came into possession of  
14 the third edition, I think -- possibly it might have  
15 been purchased for the sake of the project.

16 Q. Right.

17 If you look at page 33 {CEL00000584/33}, in this  
18 document, this is within annex B, as you can see from  
19 the top right-hand side of the document, and annex B is  
20 about the performance criteria and classification for  
21 BS 8414-2. Dive straight into the middle of the annex.  
22 But if you look at that page, you can see on the  
23 right-hand side there are three bullet points, and  
24 underneath the bullet points it says:

25 "The classification applies only to the system as

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1 tested and detailed in the classification report. The  
2 classification report can only cover the details of the  
3 system as tested. It cannot state what is not covered.  
4 When specifying or checking a system it is important to  
5 check that the classification documents cover the  
6 end-use application."

7 Can we take it, Mr Hayes, that from the time you  
8 read this document in the first part of 2013, you were  
9 fully aware of those principles set out there?

10 A. Yes, and I'm not sure if my understanding came from  
11 reading this document or whether it was a combination of  
12 things that we were learning on the project, but I came  
13 to understand that the test was a test of the system  
14 that was on the rig on that day, and only covered what  
15 was tested and did not cover other things.

16 Q. So far as you could observe from those around you  
17 working on the RS5000 project, did they also know and  
18 understand the principles, if not the exact wording --

19 A. Yes.

20 Q. -- as set out in annex B there?

21 A. Yes.

22 MR MILLETT: Yes, thank you.

23 Mr Chairman, is that a convenient moment? I think  
24 it's a convenient moment in the questions.

25 SIR MARTIN MOORE-BICK: Yes, very well.

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1 We have a break during the morning and the  
2 afternoon, Mr Hayes, and this is a convenient time to  
3 take a short break this morning. So we're going to stop  
4 now. We will come back at 11.35, please.

5 THE WITNESS: Thank you.

6 SIR MARTIN MOORE-BICK: I have to ask you while you're out  
7 of the room not to talk to anyone about your evidence or  
8 anything relating to it.

9 THE WITNESS: Yes, thank you.

10 SIR MARTIN MOORE-BICK: All right? Thank you.

11 Would you go with the usher, then, please.

12 Thank you.

13 (Pause)

14 Thank you, 11.35, please.

15 (11.17 am)

16 (A short break)

17 (11.35 am)

18 SIR MARTIN MOORE-BICK: All right, Mr Hayes, ready to carry  
19 on?

20 THE WITNESS: Yes, thank you.

21 SIR MARTIN MOORE-BICK: Thank you very much.

22 Yes, Mr Millett.

23 MR MILLETT: Mr Chairman, thank you.

24 Now, Mr Hayes, am I right in thinking that you were  
25 the only TSO at Celotex involved in the testing of

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1 RS5000?

2 A. That's correct.

3 Q. Now, in terms of individuals, Rob Warren was also  
4 involved, wasn't he?

5 A. Yes, he was.

6 Q. To what extent was he involved in the testing, either in  
7 the design or the carrying out of the testing?

8 A. So Rob Warren was head of technical, so as well as  
9 managing our department he was basically the highest or  
10 most senior person technically within Celotex. So ...  
11 it might be helpful just to clarify that Paul and Rob  
12 and Jon were physically in very close proximity to each  
13 other, so possibly even Jon and Paul sharing an office  
14 or their offices being essentially right next to each  
15 other, so I think that it was very common for them to  
16 talk often, to share information, and I think that Paul  
17 and Jon would have leaned on Rob quite a bit for input,  
18 and he would have been involved in many discussions  
19 around the project.

20 Rob was present at key meetings, such as the  
21 18-metre update meeting, which we may come to.  
22 I believe that Rob was present at both tests. He was  
23 certainly present at the first test that I was also  
24 present at. Rob was at the introduction training which  
25 was delivered by Jon and Rob to the Celotex technical

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1 centre team on the introduction of RS5000, and I think  
2 that Rob would also have been present, although I have  
3 to say I'm not sure whether this is the case, but it  
4 would be normal for him to be present at national sales  
5 conferences where new products are launched. So he may  
6 well have been at that event as well.

7 Q. Can we go to page 12 of your statement {CEL00010054/12},  
8 please, and look at paragraph 36. You say there:

9 "Our initial considerations focused on figuring out  
10 what the rules and regulations were with respect to  
11 insulation for buildings above 18 metres and where we  
12 could find this information."

13 Then later on in that paragraph, you say:

14 "We knew that we wanted to compete with Kingspan's  
15 K15 ..."

16 Then you go on to say:

17 "... the starting point was Kingspan's literature .  
18 They had a publicly accessible data sheet and BBA  
19 certificate for their K15 product, as well as some  
20 literature on their website. We relied on no more than  
21 10 relevant documents to provide this key information."

22 And you give some examples.

23 So do we take it from that that, although you had  
24 come to the project with the knowledge that we discussed  
25 just before the break about the BR 135 and BS 8414

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1 testing in general terms, your further researches took  
 2 you to the Kingspan marketing literature?  
 3 A. Yes, that's correct.  
 4 Q. Yes.  
 5 Now, let's look at these documents, or some of them.  
 6 First, please, {CEL00008509}. This is a Kingspan  
 7 technical bulletin, as you can see from the top  
 8 left-hand corner, and top right-hand corner, third  
 9 issue, September 2010.  
 10 Is this one of the documents that you looked at as  
 11 part of your initial researches?  
 12 A. I believe so.  
 13 Q. It's called "Insulation for Ventilated Rainscreen  
 14 Cladding Systems, Compliance with Approved Document B2".  
 15 If you look at page 3 {CEL00008509/3} on that document,  
 16 you can see that there is section 12.5 of ADB, which  
 17 I think you were familiar with anyway; is that right?  
 18 A. Yes, we were familiar with that information from the  
 19 technical bulletin number 26, which then formed the  
 20 basis for the document that I had produced, which  
 21 I think gave this information.  
 22 Q. If you go to page 4 {CEL00008509/4}, at the top it says:  
 23 "Kingspan Kooltherm K15 Rainscreen Board is the  
 24 first insulation board to achieve LABC Type Approval as  
 25 a thermal insulation layer in rainscreen cladding

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1 systems. It remains the only insulation board that  
 2 holds both BBA Certification and LABC Type Approval."  
 3 Was that statement there a factor in the decision  
 4 that Celotex took later to obtain LABC registered  
 5 details for RS5000?  
 6 A. I think that the fact that Kingspan had those  
 7 accreditations would have informed Celotex's decision to  
 8 get LABC approval.  
 9 Q. Yes.  
 10 Someone has written "expired" and underneath that  
 11 "K15 week". I think that's what it says. Do you know  
 12 whether those scribbles were on the document that you  
 13 looked at, or whether somebody within Celotex added  
 14 those?  
 15 A. That looks like my handwriting.  
 16 Q. Right.  
 17 A. And I wonder, looking at this document and the fact that  
 18 it looks to be a scan or photocopy-type document,  
 19 I wonder if this version of it has actually been taken  
 20 off my desk, possibly.  
 21 Q. Right. Do you know what you meant by "expired K15  
 22 week"?  
 23 A. They might be separate notes, so it might be that  
 24 "expired" is one note, and that possibly refers to LABC,  
 25 although I don't remember why I wrote that now, and then

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1 "K15 week" might be a different note, and referred to  
 2 something different. But I don't remember now what --  
 3 why I wrote that, "K15 week", or what that means.  
 4 Q. Right.  
 5 Then you can see a little bit lower down, just to  
 6 finish this page off, it refers in the third paragraph  
 7 down to the LABC type approval:  
 8 "... thus eases the planning process for projects  
 9 incorporating Kingspan Kooltherm K15 Rainscreen Board,  
 10 and applies in all situations shown on Diagram 40 of  
 11 Approved Document B Volume 2, including those parts of  
 12 a building more than 18m above ground (Figure 5)."  
 13 And there in figure 5 is diagram 40 of Approved  
 14 Document B, "Provisions for external surfaces or walls",  
 15 which on the right-hand side there refers to class 0 as  
 16 being the classification for fire for the requirement of  
 17 external wall surfaces.  
 18 When you looked at that, did you ask yourself what  
 19 the relevance of K15 having class 0 was, by reference in  
 20 particular to diagram 40 as they've set out on the page  
 21 there?  
 22 A. No, I don't believe that I did. I remember, when  
 23 I first saw diagram 40, being quite confused as to what  
 24 it actually meant, and whether it was referring to the  
 25 performance of the cladding or the performance of

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1 insulation, but I believe what diagram 40 is talking  
 2 about is the performance of the cladding rather than the  
 3 performance of the insulation board, and I would have  
 4 formed an opinion, I think, at some point, although I'm  
 5 not exactly sure when, that actually that diagram is not  
 6 relevant to insulation performance.  
 7 Q. Indeed. As such, did you then begin to question the  
 8 reliability of Kingspan's marketing material such as  
 9 this?  
 10 A. I don't remember querying that part of it or feeling  
 11 that that particular part of it was -- I don't remember  
 12 paying a lot of attention to that particular part of it,  
 13 although there certainly were parts of Kingspan's  
 14 literature that we found confusing, and not really clear  
 15 how it matched what we were seeing as enquiries coming  
 16 into the business.  
 17 Q. Right.  
 18 Can we go to {CEL00008510}, please. This is  
 19 Kingspan's datasheet for "Kooltherm K15 Rainscreen  
 20 Board, Insulation for rainscreen cladding systems", and  
 21 at the top right-hand corner you will see that it was  
 22 the ninth issue, March 2011. Do you see that?  
 23 Was this also one of the Kingspan documents that you  
 24 looked at as part of your researches?  
 25 A. Yes, we definitely would have looked at the

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1 Kooltherm K15 literature. Whether this was the exact  
2 dated version that we saw, I don't specifically recall,  
3 but if this is the version which was current at the  
4 time, which would have been, you know, 2013, then yes,  
5 it would have been.

6 Q. Yes.

7 Let me show you the third bullet point down on the  
8 right-hand side. It says:

9 "Successfully tested to BS 8414:2002, can meet the  
10 criteria within BR135 and is therefore acceptable for  
11 use above 18 metres."

12 First, given that the reference to 8414:2002 was  
13 a reference to part 1, did you understand that, at that  
14 time, K15 didn't have a pass at BS 8414-2:2005?

15 A. Yes, I believe we became aware of that during the  
16 project and as we looked at their documentation.

17 Q. Did you also become aware of the fact that,  
18 notwithstanding that Kingspan had not had a pass at  
19 BS 8414-2:2005, nonetheless it was being used on steel  
20 frame constructions? Did you know that?

21 A. Yes, I think I would have done.

22 Q. What did that tell you about the way Kingspan was using  
23 or not using the tests to sell its Kooltherm K15?

24 A. I think initially it told us that they had managed to  
25 gain wide market acceptance for their product, with lots

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1 of different types of constructions, I think, not only  
2 the variants of the steel frame to masonry, but possibly  
3 with lots of different cladding types as well, and they  
4 had managed to do that on the basis of -- I think the  
5 literature only references a single test that they had  
6 completed.

7 Q. Then sticking with the wording, as I've shown you, it  
8 says in that bullet point:

9 "... can meet the criteria within BR135 ..."

10 Now, you told us earlier that, at least come the  
11 first part of 2013, you had read annex B of BR 135 and  
12 understood that the criteria there only applied to the  
13 system as tested. Was that so when you looked at this  
14 document?

15 A. Yes, I think we would have had that awareness as we  
16 reviewed this document.

17 Q. Then when you go on to see the words that follow it:

18 "... and is therefore acceptable for use above  
19 18 metres."

20 The "therefore", did you think that that meant that  
21 Kingspan were saying that K15 could be used in any  
22 system, or were they saying only in a system exactly the  
23 same as the system tested?

24 A. I think -- and it's difficult to say exactly when you  
25 formed a view, because I've obviously looked at these

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1 documents many times from the beginning of our RS5000 as  
2 I sit here today, and so it's sometimes difficult to say  
3 what was in my mind at that time, but I believe we would  
4 have formed a view that this was a piece of clever  
5 marketing, and that they were trying to imply that their  
6 product could be used with a wide variety of different  
7 constructions.

8 Q. Even though --

9 A. Even though that was not strictly speaking correct.

10 Q. Right.

11 When you say clever marketing, let me just press you  
12 just a little: did it occur to you at the time when you  
13 read this that the statement "and is therefore  
14 acceptable for use above 18 metres" was misleading?

15 A. I don't -- I think at the time we would have wondered  
16 how they were able to do it, and possibly we might have  
17 thought: is there a trick that we've missed? So,  
18 for example, did they have an engineering report or  
19 a technical judgement which might have meant that they  
20 were able to show that they could be used with other  
21 systems? Maybe they had some testing that they hadn't  
22 referenced on their literature.

23 So I think certainly initially it was: how are they  
24 able to do it? So I don't think we would have  
25 necessarily formed the opinion at the very beginning:

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1 Kingspan are doing something wrong, there's something  
2 rotten here. I think it would have been how, how are  
3 they doing it, would have been the question to start  
4 with.

5 Q. Did you note when you read that that there is no caveat  
6 or disclaimer here that K15 can only be used in the same  
7 system as that tested?

8 A. I think, to be fair, I probably would read the whole  
9 document and see whether that has been placed into  
10 context somewhere else. So I can't immediately recall  
11 what's on the other pages of this document, but perhaps  
12 they have included a caveat somewhere else. But I would  
13 agree that if you look at that statement in and of  
14 itself, that is misleading.

15 Q. Yes.

16 Well, let's look a little bit lower down, page 6,  
17 just to make sure that we don't only take a partial look  
18 at the document. Go to page 6 {CEL00008510/6}.

19 Right-hand side, under the heading "Fire Performance",  
20 you can see there, there is a reference to class 0 at  
21 the top, and then it says, halfway down underneath the  
22 test:

23 "Kingspan Kooltherm K15 Rainscreen Board in the  
24 construction specified in the table below, when  
25 subjected to the British Standard fire test BS 8414:2002

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1 (Fire performance of external cladding systems. Test  
2 methods for non-load bearing external cladding systems  
3 applied to the face of a building), has achieved the  
4 result shown."

5 And it sets out the construction and the result.

6 It says, under "Result":

7 "The tested product meets the criteria stated within  
8 BRE 135 (Fire performance of external thermal insulation  
9 for walls of multi storey buildings) and is therefore  
10 acceptable for use above 18 metres in accordance with  
11 the Building Regulations/Standards."

12 Did you read that?

13 A. Yes, I'm sure that we would have done.

14 Q. Did that strike you at the time as a disclaimer or  
15 caveat?

16 (Pause)

17 A. I think they're trying to strongly imply that you could  
18 use that in multiple constructions, but it sort of  
19 doesn't make logical sense, because on the left-hand  
20 column they've provided details of a system that passes,  
21 but on the right-hand side they are, I think, strongly  
22 implying that because of that test you can use it in any  
23 building above 18 metres.

24 Q. And was that a thought you had at the time when you  
25 looked at this document as part of your initial

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1 researches?

2 A. I think we would have come to that conclusion at some  
3 point, but as I said, I think initially when we looked  
4 at it, I think the thought would have been: how have  
5 they done it? Is there something that's not clear?  
6 Have they got, you know, something up their sleeve,  
7 I guess, which would allow them to make that statement?

8 Q. Yes.

9 Now, looking a little bit later in the year, 2013,  
10 can we go to {CELO0003008/2}, please, first of all.  
11 About a third of the way down the second page there, you  
12 can see that there is an email sent on 18 October, you  
13 can see that, from Jonathan Roper to you, "Kingspan CTC  
14 Enquiry", and Jonathan Roper I think says:

15 "Anything I've missed?"

16 Then there is set out:

17 "Purpose - To gain further information on what  
18 recommendations Kingspan are giving in regards to the  
19 use of K15 in buildings above 18m.

20 "Project - First project of this scale

21 "Student Accom/Commercial

22 "Metsec frame, cement particle board, Nvelope (NVI)  
23 bracket systems with Trespa Meteon 2mm panels rivet  
24 fixed.

25 "Objectives -

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1 •" Is K15 applicable with all cladding systems (2mm  
2 or 3mm aluminium panels TRESPA/MARLEY etc) as their BBA  
3 certificate states the test used a cementitious board as  
4 the overcladding?"

5 Then there are further objectives and questions set  
6 out underneath that.

7 The third one you can see is:

8 "Which particular system was tested to BR 135 and  
9 what assurances can they give that it covers all  
10 cladding systems?"

11 Was this exercise one which was part of a mystery  
12 shopper exercise to try to find out more about K15?

13 A. I believe that's exactly what it was.

14 Q. Right. If we scroll up, I think we can see how this  
15 turns out.

16 You go back to Jamie Hayes(sic) on 18 October,  
17 bottom of page 1, top of page 2, and then on page 1  
18 {CE:00003008/1}, if we just go up to that,  
19 Jonathan Roper sends an email to Debbie Berger,  
20 18 October 2013, copied to you:

21 "Hi Debbie,

22 "If you are still happy carry out the mystery caller  
23 scenario on K'span, could the three of us get together  
24 early afternoon today?

25 "See the brief below ..."

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1 Now, we have seen the first bullet point and the  
2 third bullet point questions.

3 Is it right that, by this stage, you and Mr Roper  
4 were aware that the BR 135 certification only covered  
5 the tested configuration and components? I think that's  
6 right, isn't it, looking at BR 135, as we did earlier?

7 A. Yes, I think that's correct, yes.

8 Q. What prompted you to ask these two questions about the  
9 breadth of the application of K15?

10 A. I think it goes back to what we were just talking about  
11 when we could see how Kingspan were marketing their  
12 material, and confusion within Celotex of how they had  
13 been able to be widely accepted, and just trying to find  
14 out some more information about how they were able to do  
15 that, about what they were telling customers and how  
16 they would answer enquiries to potential customers.

17 Q. Right. So the idea would be to pose as a potential  
18 customer with a student accommodation type building and  
19 ask those questions and see what they said?

20 A. Yes. I think a key part of it was to try and get them  
21 to send us a copy of their test report.

22 Q. Right.

23 The email at the top of this thread on page 1  
24 suggests that Debbie Berger may have carried out the  
25 mystery shopper exercise. Do you know whether she did?

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1 A. She did.  
 2 Q. Do you know what the results were?  
 3 A. Yes, I think that it was undertaken in the same room  
 4 with me and Jon, and that Debbie was on the phone and we  
 5 were listening in, although I don't think we had the  
 6 technical capability to listen to both sides, so it may  
 7 have been that we were just listening to Debbie's half  
 8 of it. But I'm sure she would have fed back what  
 9 happened in the conversation when the conversation  
 10 finished.  
 11 Q. When you say you're sure she would have done, did she?  
 12 A. Yes, she did.  
 13 Q. What did she say?  
 14 A. Well, in fact, we could hear ourselves how the  
 15 conversation was progressing, and I believe that when  
 16 she spoke to an operative of the Kingspan technical  
 17 centre, they told her explicitly that Kingspan was  
 18 suitable for her project, and I believe that she then  
 19 said, "Brilliant, can you please send me a copy of your  
 20 test report", and then I understand -- my understanding  
 21 is that the person that she was speaking to became quite  
 22 nervous, backed down, and said, "Oh, no, we can't do  
 23 that, and in fact what you'll need to do is submit your  
 24 full enquiry to us in writing, and I'm not able to help  
 25 you any further on the telephone".

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1 Q. Did you submit a request in writing or did  
 2 Debbie Berger?  
 3 A. No.  
 4 Q. You just stopped at that point?  
 5 A. Yes, because I think we realised it was not going to be  
 6 possible to push that any further.  
 7 Q. Right.  
 8 Why did you think that it wasn't going to be  
 9 possible to obtain Kingspan's test report?  
 10 A. I think we had formed a view that that would be very  
 11 closely guarded, and I think that it wasn't entirely  
 12 unusual for information to come into the business from  
 13 Celotex's partners, so it might be that a distributor  
 14 that we had a relationship with or maybe another -- or  
 15 a specifier that we had a relationship with would  
 16 perhaps give us documents that they had got from other  
 17 companies that you wouldn't be able to ask for directly,  
 18 and I think from the fact that we hadn't ever heard of  
 19 anybody having seen their test report, I think we formed  
 20 a view that they were very careful not to release it to  
 21 anybody or to allow it to be seen by the open market.  
 22 Q. Yes. I mean, after all, that was, it seems, the same  
 23 practice that Celotex followed, not to let test reports  
 24 out because --  
 25 A. That's absolutely correct.

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1 Q. So did it play in your thinking that because Celotex  
 2 were also similarly very guarded about their own test  
 3 reports, they wouldn't expect Kingspan to be any  
 4 different?  
 5 A. I'm not sure that I formed that view, because I think  
 6 the kind of test reports that we would have had  
 7 previously wouldn't have been so relevant, so they would  
 8 be things like a class 0 test report, and I'm not sure  
 9 how that would be relevant to a customer or that we had  
 10 very often been asked for those.  
 11 Q. Right.  
 12 Can we then turn to meetings that you had with IFC  
 13 and Sotech. You referred to Sotech earlier on in your  
 14 evidence.  
 15 A. Yes.  
 16 Q. Can we go to your statement at page 13 {CEL00010054/13},  
 17 please, and look at paragraph 39. We have looked at  
 18 this before, I think. You confirmed that, and you say  
 19 there that once you had understood that the options were  
 20 either to use materials of limited combustibility or  
 21 successfully tested to BS 8414 -- and I'm summarising  
 22 there -- you say, if you look in the last sentence:  
 23 "It was decided that we would also undertake the  
 24 Test and so we began seeking help with the components of  
 25 our test rig."

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1 Do you remember when the decision was made to seek  
 2 help with components of the test rig for the test?  
 3 A. I don't know. So my role on the project was to help  
 4 Jon, really, with tasks as and when I was asked to do  
 5 so, so my work on the project represented a fraction of  
 6 a percentage of my time, which was spent primarily doing  
 7 my day-to-day work, which is answering customer  
 8 enquiries. So I think Jon would have arranged this  
 9 meeting, have asked me to go with him, I would have got  
 10 permission to do that from my line manager, which would  
 11 have been Rob Warren, and I would have attended the  
 12 meeting with him.  
 13 Q. Right. And who was it who made the decision who  
 14 undertake the test?  
 15 A. I think the decision would have been made by --  
 16 primarily by Paul Evans and Craig Chambers.  
 17 Q. Did you yourself have a discussion with Craig Chambers  
 18 about undertaking the test?  
 19 A. No, but I was present at a meeting that Craig was at,  
 20 which was the 18-metre update, and actually I think  
 21 perhaps that meeting was when a decision perhaps was  
 22 made to undertake the test.  
 23 Q. Right.  
 24 When you refer to the 18-metre update meeting, was  
 25 that a meeting on 4 November 2013 for which Mr Roper

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1 produced some slides?

2 A. Yes.

3 Q. Right. We may come to that later on, but can I just ask

4 you, in light of the decision to undertake the test,

5 about some of the meetings with IFC and Sotech.

6 If we can go to paragraph 40, the next paragraph of

7 your statement, you say:

8 "In or around May-June 2013 JR arranged a couple of

9 meetings at the IFC and I went along with him on at

10 least one occasion. We met a person called Peter and

11 a lady, whose name I cannot now recall; the lady would

12 later come along to the first BRE test with us."

13 Pausing there, was that Peter Jackman?

14 A. Yes, it was.

15 Q. And the lady, was that Dr Parina Patel?

16 A. Yes, and actually since I submitted this statement,

17 I found a business card for that lady, and her name was

18 Parina Patel.

19 Q. Right.

20 If we go to {CEL00010340}, this is an email run at

21 the end of May 2013, and if you look at the second email

22 down on that page, this is an email from Jonathan Roper

23 to you, 28 May 2013:

24 "Jamie,

25 "Peter at IFC has asked if we can make a 2pm

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1 appointment next Monday to discuss above 18m."

2 Then if you look at your response to him at the top

3 of page 1, you go back to him the next day and say:

4 "It's ok with me Jon.

5 "How long is the journey?"

6 It looks as if the meeting had been fixed for

7 3 June 2013, which was the next Monday. There is

8 a meeting later on, on 22 June 2013, for which we have

9 notes, but we don't have any notes of any meeting early

10 in June 2013.

11 Did the meeting take place, do you think?

12 A. Wow. Erm ... I ...

13 (Pause)

14 I was at one meeting, I believe, at IFC's offices,

15 but I can't actually remember the date that that was.

16 Q. I think it was October, in fact.

17 A. Okay.

18 Q. We will come to the note of that in a moment. But you

19 don't recall meeting IFC in June at all?

20 A. I may be getting the two different ones confused.

21 Q. Right.

22 A. I remember one meeting, but I don't remember the date of

23 it. But I think I say in my statement that I may have

24 been at more than one meeting.

25 Q. Right. It may be we can disentangle this a little bit.

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1 It seems that there was a meeting in October 2013.

2 Let me just show you the note of that, because it's

3 a meeting at which Sotech were also present.

4 {CEL00011052}. We can see that this is a meeting on

5 3 October 2013 to discuss the above 18 metres fire test.

6 You can see that, at that meeting, John Egginton from

7 Sotech was there and David Cooper from IFC was there,

8 but not Peter Jackman or Parina Patel, but you were

9 there at that meeting.

10 A. So I think that was the meeting with IFC, and that was

11 at their offices --

12 Q. Right.

13 A. -- which I attended, and I think that, in this meeting,

14 we're at Sotech and David Cooper has driven to meet us

15 at that meeting.

16 Q. Fine. So you met IFC people twice but you had one

17 meeting with the IFC at their offices?

18 A. Yes.

19 Q. Right. We will come back to that.

20 We'll take that off the screen and go to

21 paragraph 41 of your statement, if we can, please, also

22 on page 13 {CEL00010054/13}, as you can see in front of

23 you. You say there:

24 "From our meeting with the IFC, we established that

25 a Field of Application Report ('FOAR') involves an

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1 expert's opinion that a product was acceptable for use

2 in a way similar and not identical to the way tested in

3 the test rig."

4 Now, as far as you recall it, is this right: it was

5 the IFC who told you that a field of application report

6 was possible?

7 A. Yes, we'd met with Peter and Parina, and possibly

8 another member of their team. Peter gave the impression

9 of being extremely experienced. He was a character, and

10 he was not shy in putting forward that he was

11 a heavy-hitter, and he talked about how he had

12 effectively, in his memory, drafted the Hong Kong fire

13 regulations, and, yes, they gave the strong impression

14 that it might be possible to use an 8414 test and, from

15 that test, produce a field of applications report which

16 would allow some components of that rig to then be

17 varied.

18 Q. Did Mr Jackman or Dr Patel identify any official

19 guidance or industry practice which allowed a field of

20 application report to be used in conjunction with

21 a BS 8414 test result?

22 A. Not that I remember. They may have referenced some

23 standards which I don't now recall.

24 Q. Right.

25 Now, just to go back then to the meeting on

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1 3 October, the note of which I have just shown you, you  
2 deal with that at paragraphs 42 and 43 of your  
3 statement, over the page, page 14 {CEL00010054/14}, and  
4 you set out your recollection of that.

5 We can look at the note of the meeting, as I say.  
6 It's at {CEL00011052}, which is what we just looked at  
7 a moment ago, and I would like to go back to with you.

8 It says -- and this is we think Jon Roper's note.  
9 Can you confirm that?

10 A. I actually believe that I wrote this.

11 Q. You thought you wrote this?

12 A. Yes.

13 Q. Okay.

14 Under "Fire test":

15 "Very problematic to pass - Kingspan failed twice  
16 with standard cavity barriers."

17 Just on that, do you remember who said that?

18 A. Yes, that would have been John from Sotech.

19 Q. Then third bullet point down:

20 "Still no idea how Kingspan support the use of  
21 decorative cladding as their fire test uses  
22 a non combustible cladding."

23 Do you remember who said that?

24 A. I think that is -- that note is intended to show,  
25 I think, a view that was formed by the people at that

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1 meeting together, as opposed to one person saying that.

2 Q. So that was a joint no idea?

3 A. Yes.

4 Q. Right.

5 Then the reference to decorative cladding, as you  
6 can see in that third bullet point, is also referred to  
7 in the second bullet point:

8 "John at Sotech sceptical about pass with decorative  
9 cladding."

10 What did you understand by the phrase "decorative  
11 cladding"?

12 A. Well, as I look at that today, I'm not sure I remember  
13 exactly what is meant by that. I think that it is  
14 either a reference to any cladding which is a normal  
15 cladding panel, and by a normal cladding panel I mean  
16 something that you could actually -- was put to market  
17 to be a cladding panel of a building, as opposed to the  
18 cement board that Kingspan had used. But it might also  
19 refer to -- because I think -- and I might not have  
20 remembered this correctly, but I think that Sotech  
21 specialised in certain types of cladding, and I think  
22 that they did aluminium cladding and high-pressure  
23 laminates, and so it may have been, when he's -- maybe  
24 when John is talking about decorative cladding, he's  
25 thinking the types of cladding that he uses, which is to

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1 say aluminium and high-pressure laminates, and might  
2 not, for example, include things like fibre cement  
3 panels, which I don't think John ever got involved in.

4 Q. Were you aware that Sotech had previously met Jon Roper  
5 in June 2013 and told him that they had attempted to  
6 test to BS 8414-2 using Kingspan K15 and had failed?

7 A. No, I was not aware of that, but I think that the same  
8 conversation happened at this meeting, and John -- or  
9 not the same conversation, but John did reference  
10 testing with Kingspan and failing during this meeting.

11 Q. Right. Were you given any details about the failed  
12 Kingspan tests?

13 A. Yes.

14 Q. What did they say?

15 A. Well, I got the impression that he wasn't supposed to  
16 talk about it because he had possibly been under  
17 a non-disclosure agreement, but he made his own decision  
18 that he would do so anyway, and he described them as  
19 failing quite badly, and I think he made the comment  
20 that one of them had failed so badly that there had been  
21 concerns from the BRE that it was going to set the roof  
22 of the burn hall on fire.

23 Q. Right. Indeed, at paragraph 42 you do say that Sotech  
24 told you that K15 had failed badly using aluminium  
25 cladding.

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1 That's not in your note. Why is it not in your  
2 note?

3 A. I'm not sure. I think in the first paragraph I've got  
4 "Very problematic to pass - Kingspan failed twice with  
5 standard cavity barriers", perhaps I felt that covered  
6 that, or perhaps I was trying to show -- trying to be  
7 more formal, perhaps, in terms of how this document is  
8 laid out, rather than being anecdotal, I suppose, or ...

9 Q. Right.

10 Can we just look at paragraph 42 {CEL00010054/14}.  
11 You say in the last part of that paragraph, three lines  
12 up from the end, that:

13 "... John Egginton from Sotech, who informed us that  
14 Sotech had undertaken a Test with Kingspan which had  
15 failed badly using aluminium cladding and following  
16 that, Sotech had no further involvement with the testing  
17 of Kingspan products."

18 So although it's not in your note, you're  
19 confirming, are you, here today, that that was the  
20 subject of discussion at that meeting?

21 A. Yes.

22 Q. Although it's not in your note?

23 A. No, that's correct.

24 Q. So can we take it from that meeting that you were aware  
25 as a result that aluminium rainscreen panels would not

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1 likely have passed with RS5000 either?  
 2 A. Yes.  
 3 Q. Now, do you remember whether there was any discussion of  
 4 ACM panels, aluminium composite material panels, at that  
 5 meeting?  
 6 A. I think at that time, I don't think I would have  
 7 necessarily understood what ACM was or what the  
 8 difference between ACM and aluminium was. So  
 9 I understand now that there are differences between  
 10 solid aluminium and aluminium composite materials,  
 11 I understand that there are differences between  
 12 aluminium composite materials, but I don't recall that  
 13 I understood that well at the time that I wrote that  
 14 note.  
 15 Q. Had you not come across ACM panels in the course of your  
 16 by then eight or nine years at Celotex?  
 17 A. I'm sure that I would have come across them. So just to  
 18 try and expand upon that a bit, many of the enquiries  
 19 that we received into Celotex were for low-rise  
 20 buildings, so rainscreen enquiries would have been a lot  
 21 rarer. But also, the major part of our job in technical  
 22 was to perform U-value calculations for people, and when  
 23 you do a U-value calculation for a rainscreen cladding  
 24 application, it doesn't matter what the actual  
 25 rainscreen panel is.

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1 Q. I follow. I follow.  
 2 Going back to the note, if we can, at {CEL00011052},  
 3 you can see in the first bullet point it says, "Very  
 4 unlikely to pass".  
 5 Was that your view or something that was said at the  
 6 meeting, just to be clear?  
 7 A. I think that is a record of a consensus which was formed  
 8 at that meeting.  
 9 Q. Right. I mean, did John Egginton or David Cooper say:  
 10 you, Celotex, are very unlikely to get what became  
 11 RS5000 to pass a BS 8414 test?  
 12 A. I don't remember that explicitly. My impression was --  
 13 and I have to be careful, because I've seen a lot of  
 14 evidence and documents, but I think I'm correct in  
 15 saying that the impression that I had at the time was  
 16 that John didn't like Kingspan very much, he didn't like  
 17 them as people, he didn't like their product, he liked  
 18 mineral wool, and that he I think equated PIR and  
 19 phenolic foam with being quite ... he saw them in the  
 20 same way, I think. So I think that he would have had  
 21 the view that if Kingspan haven't passed, you are not  
 22 going to pass.  
 23 Q. Looking at the fourth bullet point, it says:  
 24 "Very unlikely to pass on the basis that  
 25 Celotex FR5000 is slightly better than Phenolic

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1 (according to IFC testing )."  
 2 Can you explain what that means?  
 3 A. I think that goes back to the meeting that we had had  
 4 with IFC, and they had expressed a view to us that they  
 5 felt that FR5000 might have a slightly better  
 6 performance than phenolic foam in terms of fire, and  
 7 therefore you might be able to do slightly more with it  
 8 in terms of passing a test than you would be able to do  
 9 with phenolic foam.  
 10 Q. Right. I would just like to try to understand the  
 11 sentence, "Very unlikely to pass on the basis that  
 12 Celotex FR5000 is slightly better than phenolic". Why  
 13 would it be very unlikely to pass if FR5000 was better  
 14 than phenolic?  
 15 A. Because -- I guess because you would need to be not just  
 16 a little bit better than Kingspan, you would have to be  
 17 a lot better, and that perhaps small variances between  
 18 PIR and phenolic are not going to be enough to overcome  
 19 the fact that Kingspan had seemed to have failed quite  
 20 badly.  
 21 Q. It still doesn't quite explaining the words in the  
 22 sentence "on the basis that Celotex FR5000 is slightly  
 23 better than phenolic". If Celotex FR5000 was better  
 24 than phenolic, wouldn't that mean that it was more  
 25 likely to pass than Kingspan?

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1 A. Yes, it would.  
 2 Q. It doesn't say that, though?  
 3 A. No, it doesn't.  
 4 Q. So can you explain?  
 5 (Pause)  
 6 A. So let's say that Kingspan has failed quite badly in  
 7 that test. You have a product which is slightly better,  
 8 and that is still going to be quite unlikely to pass,  
 9 because you would have to be a whole lot better.  
 10 Q. Right, I see. So does that mean that Kingspan was very  
 11 problematic; RS5000, as it became, was still  
 12 problematic, still very unlikely to pass, but only  
 13 marginally more likely?  
 14 A. Yes, with the types of cladding that John is familiar  
 15 with, which I think would have been aluminium and  
 16 high-pressure laminates.  
 17 Q. And that failure, potential for failure, was that in all  
 18 cases or only with a metal panel, or decorative  
 19 cladding, perhaps?  
 20 A. I don't really remember, but I think I got the  
 21 impression that they had done the same test twice. So  
 22 they hadn't done one test and said, "Let's change some  
 23 stuff around"; they had done the first -- one test and  
 24 then had another crack at it.  
 25 Q. You can see in the fifth bullet point down it says:

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1 "Possible idea to design 'double cavity  
2 fire barrier'."  
3 Who said that at the meeting?  
4 A. I think it was an idea which was put forward to us by  
5 John at Sotech.  
6 Q. Would that be an unusual feature in a construction, in  
7 your experience as it stood at the time?  
8 A. No, I don't think so. I think at that point in time we  
9 didn't really understand what were the parameters that  
10 would make a test more or less likely to pass, so when  
11 John came up with the idea of having a double cavity  
12 fire barrier, I think we probably thought: oh, that's  
13 a pretty good idea, maybe we can take that away and have  
14 a think about that.  
15 Q. Right. Did he say that he had used one?  
16 A. No, I think he was spitballing, I don't think --  
17 Q. Spitballing? Can you just explain what that means?  
18 A. Yes, sorry, I think he was just sitting there and giving  
19 ideas off the top of his head. I wasn't aware that he  
20 was saying, "There is this product in the market that  
21 you could use", I think he was saying you could kind of  
22 make that yourself, if that makes sense, by using two  
23 products which are commonly available and combining them  
24 into one.  
25 Q. Right, okay. Is that something you had thought of

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1 yourself before or --  
2 A. No.  
3 Q. -- was this news to you?  
4 A. In fact, our knowledge of fire barriers, I think, as we  
5 stood there at that meeting was virtually zero.  
6 Q. He was the one who came up with this idea of the double  
7 cavity fire barrier as a possibility?  
8 A. Yes, but just to -- what he meant there was a metal tray  
9 with a mineral wool on top, and that is a completely  
10 different concept from what would later become the  
11 fire barrier with the missing material.  
12 Q. I follow.  
13 Can you go to page 2 {CEL00011052/2} in this  
14 document, please. At the top of that page, you see  
15 there in the first bullet point it says:  
16 "On the basis that the fire test is going to be  
17 a close call (if we can even pass it) I think we can not  
18 rely on the field of applications report allowing  
19 a breathable membrane over the face of the insulation."  
20 Does that bullet point record your own thoughts or  
21 something that was said during the meeting by somebody,  
22 or anybody else?  
23 A. Yes, this is to do with positioning of breathable  
24 membranes. So in our literature for rainscreen  
25 cladding, and there was literature for rainscreen

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1 cladding because it was used or was suitable for use on  
2 low-rise buildings, Celotex showed that a breathable  
3 membrane would be positioned on the outside face of the  
4 insulation, which means that, in a fire event, the flame  
5 would hit the breathable membrane before it hit the  
6 insulation.  
7 Q. Right.  
8 A. Kingspan had always shown the breathable membrane behind  
9 the insulation, where it's hidden away between the  
10 insulation and the sheathing board, and my thought here  
11 was: oh, you know, we need to think about this, because  
12 actually if we have the breathable membrane in the  
13 position where it has always historically been required  
14 to be for Celotex, you know, isn't that going to cause  
15 a problem? And my thought there is that the field of --  
16 because I don't think it would be common to put the  
17 breathable membrane in the test itself. So I'm trying  
18 to raise the thought there about I don't think a field  
19 of applications report, such as might be produced by  
20 IFC, is going to be -- allow you to -- or account for  
21 the fact that you have this breathable membrane over the  
22 front face of the insulation.  
23 It wasn't a concern that anybody else was really  
24 interested in, and what happened in the end was that  
25 Celotex changed its position on where the breathable

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1 membrane should be, and basically said, "We're going to  
2 pick it up and move it behind the insulation, the same  
3 as Kingspan would".  
4 Q. Is it fair to say that the upshot of this meeting was  
5 that you came away not particularly optimistic about the  
6 prospects of passing a BS 8414 test for RS5000?  
7 A. Certainly with the types of cladding that John did,  
8 which were various types of metal claddings and  
9 high-pressure laminates.  
10 Q. Those types of cladding were -- is this right? -- fairly  
11 representative of a wide range of cladding panels being  
12 used in the market?  
13 A. Yeah, I don't think at this time, or really much later,  
14 I really ever understood what the percentages were of  
15 what types of cladding panel would be most commonly  
16 used. So let's say that you have 100 buildings, would  
17 60 of those buildings be ACM and 20 of those buildings  
18 be fibre cement and eight of those buildings be  
19 terracotta? So I don't think I really understood what  
20 percentage of the market those types of cladding panels  
21 would be.  
22 Q. Did you have any views at the time about the  
23 representative nature of the cladding panel that  
24 Kingspan had used in order to pass their 8414 test?  
25 A. Yes, I think the feeling was that it was completely

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1 unrepresentative of any panel which would ever be used  
 2 in real life .  
 3 Q. Right.  
 4 Can we look at {CEL00000615}, please. This is  
 5 a copy of Kingspan's October 2008 BBA certificate , which  
 6 has been disclosed to the Inquiry by Celotex.  
 7 Was it in Celotex's possession because you had  
 8 considered this document as part of your research, do  
 9 you think?  
 10 A. I'm sure that it would have been, yes.  
 11 Q. Right.  
 12 Now, let's just look at the first page of it .  
 13 Three-quarters of the way down you can see "Behaviour in  
 14 relation to fire ", under the heading "Key factors  
 15 assessed", and it says:  
 16 "The boards will not contribute to the development  
 17 stages of a fire . The product has been tested to  
 18 BS 8414-1:2002 for one specific construction on masonry  
 19 walls (see section 7)."  
 20 Did you read that, do you think, at the time when  
 21 you looked at this?  
 22 A. I'm sure that we would have done, yes.  
 23 Q. Yes, and if you look at section 7, page 5  
 24 {CEL00000615/5}, at the bottom of the page there it  
 25 says:

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1 "The following fire tests have been undertaken:  
 2 "to BS 8414-1:2002 for masonry substrates."  
 3 It identifies the build-up there, and in the second  
 4 line it refers to the 6-millimetre thick cement particle  
 5 boards.  
 6 So when you saw this, you would have realised, would  
 7 you, that the panels which had been used on the exterior  
 8 face of the test rig by Kingspan was a 6-millimetre  
 9 thick cement particle board?  
 10 A. Well, I think there was a bit more confusion than that,  
 11 because I think in the document that we looked at  
 12 together a short while ago, which was their datasheet,  
 13 it described the cladding as being a 6-millimetre  
 14 non-combustible board.  
 15 Q. Yes.  
 16 A. And I think our basic understanding at the time was that  
 17 cement particle boards weren't normally non-combustible.  
 18 So, actually --  
 19 Q. Right.  
 20 A. -- it's not just the fact that that's not a normal  
 21 cladding board; I think there seems to be some  
 22 inconsistency between the BBA certificate and Kingspan's  
 23 literature .  
 24 Q. Okay, thank you.  
 25 While we're on this , you can see under section 7.1,

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1 under the heading "Behaviour in relation to fire ", it  
 2 says:  
 3 "The product is classified as Class 0 or 'low risk'  
 4 as defined in the documents supporting the national  
 5 Building Regulations. The product, therefore, may be  
 6 used in accordance with the provisions of:  
 7 "England and Wales - Approved Document B,  
 8 paragraph 8.4, Volume 1 and paragraphs 12.5, 12.6 and  
 9 12.7, Volume 2 (see also Diagram 40)."  
 10 Did you see that at the time?  
 11 A. I'm sure that we would have done, yes.  
 12 Q. Did you ask yourself what the relevance of section 12.7  
 13 of ADB was, given that, on any view, K15 was never  
 14 a material of limited combustibility?  
 15 A. Well, I think that Approved Document B has those  
 16 paragraphs, and some of the paragraphs talk about it has  
 17 to be of limited combustibility and some of those  
 18 paragraphs talk about that you could use an 8414 test.  
 19 So I'm not sure, as I sit here, whether paragraphs 12.5,  
 20 12.6 and 12.7 are the paragraphs which talk about it  
 21 being of limited combustibility or whether they are the  
 22 paragraphs which talk about it being able to have  
 23 an 8414 test.  
 24 Q. Well, take it from me that section 12.7 relates to  
 25 materials of limited combustibility . That's what it

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1 deals with.  
 2 A. Okay.  
 3 Q. It sounds to me as if that didn't strike you at the time  
 4 as a strange reference, given that, on any view, K15 was  
 5 never going to be and never was a material of limited  
 6 combustibility .  
 7 A. I have to say, I don't remember, because I'm not sure  
 8 whether we would have looked at that and said, "Okay,  
 9 it's saying that it can comply with Approved Document B"  
 10 and formed the view that that was because it had been  
 11 tested to 8414, or whether we would have actually looked  
 12 at it in the level of detail where we got out Approved  
 13 Document B, went to those paragraphs and said, "Okay,  
 14 what's going on there?"  
 15 Q. You never did that.  
 16 I mean, just to be clear, what it's saying is that  
 17 the product is classified as class 0, and then goes on  
 18 to say, "The product, therefore, may be used in  
 19 accordance with the provisions of", et cetera,  
 20 paragraph 12.7.  
 21 Did you make the link between the two and ask  
 22 yourself: how could it be that a BBA certificate could  
 23 say that, because a product was classified as class 0,  
 24 it therefore satisfied the provisions of paragraph 12.7,  
 25 which was about limited combustibility?

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1 A. I think we and I would have known enough to know that  
2 that was not correct.  
3 Q. Right. So did you therefore wonder how Kingspan's  
4 BBA certificate could be remotely reliable?  
5 A. I think that we did view it as being unreliable.  
6 I think that we did -- were confused as to how they had  
7 got generic wording in their BBA certificate to say that  
8 it was or to imply that it was acceptable on, you know,  
9 pretty much any -- and didn't -- I think we were  
10 surprised that it didn't contain wording clarifying  
11 further that the test would apply to a single tested  
12 system and that it wasn't clearer in that respect. But  
13 I'm not sure I would have looked at it and  
14 cross-referenced those paragraphs and said, "Okay, it  
15 seems to be getting confused between class 0, which is  
16 only to do with cladding panels, and insulation".  
17 So I'm not sure I would have formed that view at the  
18 time.  
19 Q. Right.  
20 Can we look at paragraph 48 of your witness  
21 statement at page 16 {CEL00010054/16}. You say there:  
22 "The discrepancies and lack of transparency in the  
23 record of the cladding used in the Kingspan publications  
24 also suggested to our team that they had undertaken and  
25 passed the Test using one type of board and latterly

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1 referenced the additional use of other types of cladding  
2 with their product in their marketing materials. PE, JR  
3 and RW collectively wanted to include a panel on the  
4 Celotex test rig that could and would be used by the  
5 market as it was tested."  
6 Did you think at the time that, if in fact Kingspan  
7 had undertaken and passed the test using one type of  
8 board and then referenced the additional use of other  
9 types of cladding with their product in their marketing  
10 materials, that would have been a legitimate approach?  
11 A. No, I think there was an awareness amongst those  
12 individuals, I include myself, and the business, that  
13 actually that was not a correct approach to take.  
14 Q. So I don't want to put words in your mouth, Mr Hayes,  
15 but did you take the view at the time that Kingspan were  
16 using the test that they had undertaken and then  
17 essentially misusing it to market K15 into a wider set  
18 of applications than was legitimate?  
19 A. Yes, that is the view that I formed.  
20 Q. Yes.  
21 A. I think that is a view that was formed over the course  
22 of the project, because we explained earlier how, when  
23 we were looking at Kingspan's literature, it didn't --  
24 that view of, "They're doing something wrong" was not  
25 immediately formed, it was: how are they doing this? Do

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1 they have extra testing? Have they got field of  
2 application reports and engineers' judgements which  
3 allows their product to be used? And I think it -- the  
4 view was formed over the course of the project that no,  
5 they probably didn't have those things, and therefore  
6 they have managed to find some way to get their products  
7 accepted without the correct documentation to support  
8 it.  
9 Q. Does it come to this: that by the end or towards the end  
10 of 2013, you had done enough work to form the view --  
11 and tell me if this isn't fair -- that the market into  
12 which you wanted to launch what became RS5000 had been  
13 skewed by Kingspan's marketing literature?  
14 A. Yes.  
15 Q. I want to turn to the design of the February 2014 test,  
16 and as a run-up to this in chronological terms, we  
17 discussed earlier very briefly the meeting on  
18 4 November 2013. Do you remember attending such  
19 a meeting with Mr Roper, Mr Evans and Mr Warren?  
20 A. Yes, I do.  
21 Q. We can, just to confirm this, look at the document which  
22 convenes that meeting, {CEL00003011}, please, just to  
23 confirm that that's the invitation to the meeting, and  
24 the attendees at that meeting. Is that right?  
25 A. Yes.

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1 Q. Now, we can see that one of the attendees was  
2 Craig Chambers. Do you remember whether he was there?  
3 A. I'm sure that he was.  
4 Q. Do you remember him being there?  
5 A. I definitely remember him being there.  
6 Q. Right.  
7 Let's look at the slides, then, from the meeting,  
8 which Mr Roper told us that he prepared. {CEL00011199}.  
9 I would like just to scroll gently through the first  
10 eight slides just to set the context and refresh your  
11 recollection about what was presented at the meeting.  
12 If we could turn to page 2, you can see there is  
13 Approved Document B, and section 12.5.  
14 If we could turn to page 3, we can see that here is  
15 a description of BS 8414 in both of its formats, and the  
16 principle.  
17 If we go to page 4, we can see that here is BR 135,  
18 a reference to that, and some very basic data about  
19 that, but says in the first bullet point, "Large Scale  
20 Test".  
21 If we go to page 5, we can see the diagram taken  
22 from annex B about high-rise buildings and fire  
23 propagation up the exterior.  
24 If we can go to page 6, we see "Ventilated Façade  
25 Market" and some figures there, rigid board market

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1 estimated at 5 to 7 million there in the last bullet  
 2 point.  
 3 Then in the next slide, page 7, "External Cladding  
 4 Materials", and a long list, and you can see there the  
 5 fourth one down is aluminium composite, and underneath  
 6 that steel and then zinc, stone, fibre cement, building  
 7 boards/carrier boards.  
 8 The last bullet point there, "Building  
 9 Boards/Carrier Boards", had you actually yourself come  
 10 across those being used as an external cladding material  
 11 on a building?  
 12 A. No.  
 13 Q. Can you help us as to your understanding about the order  
 14 in which these cladding materials are set out? Does it  
 15 go from the most common to the least common, or is it  
 16 just random, do you think?  
 17 A. I believe it's probably random.  
 18 Q. All right.  
 19 A. But I didn't -- I mean, I think Jon put these together,  
 20 but it doesn't look to me that there is any kind of  
 21 order to that.  
 22 Q. If we look at page 8, slide 8, these are the cladding  
 23 manufacturers.  
 24 Then at slide 9 {CEL00011199/9}, we've got  
 25 "Kingspan K15", and we have five bullet points there:

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1 •" Tested To BS 8414-1 Onto Masonry  
 2 •" Non-Combustible Substrate Required  
 3 •" BBA Certificate  
 4 •" LABC Approval  
 5 •" Fire Barrier Testing."  
 6 If we go on to slide 14 {CEL00011199/14}, we can  
 7 then see five options. Did you think that these were  
 8 alternative routes that you thought Celotex might be  
 9 able to follow? When I say you, I mean you, plural, at  
 10 the meeting.  
 11 A. Yes.  
 12 Q. The first one is:  
 13 "Worst Case Scenario With Field Of Application  
 14 Report."  
 15 What did you understand by worst-case scenario?  
 16 A. Well, I think the most likely explanation for that is  
 17 that worst case means cladding with the worst  
 18 performance. So you would take -- you would try to find  
 19 the worst performing cladding that you could that you  
 20 might still pass with.  
 21 Q. Right, I see. Then use an FOAR with it?  
 22 A. Yes.  
 23 Q. I follow.  
 24 The second is:  
 25 "System Route (Limits Scope- Requires

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1 Re-Education)."  
 2 Was there any discussion at the meeting about what  
 3 re-education was needed?  
 4 A. So this is -- I have to be careful because actually  
 5 I don't remember the meeting that well, but I've seen  
 6 and heard so many things that I'm just trying to limit  
 7 myself to what I knew at the time.  
 8 Q. Yes, thank you.  
 9 A. But I think it refers to going out and telling the  
 10 market, "Kingspan are wrong, everything you have been  
 11 doing is wrong, actually you shouldn't have been using  
 12 those products with all different types of cladding, you  
 13 should have been using it only exactly as it was  
 14 tested".  
 15 Q. Right. Was there a view taken at the meeting, as best  
 16 you recall, about whether that was really realistic?  
 17 A. I don't remember that. I'm sure that there would have  
 18 been conversation around that, as it's a talking point  
 19 on that slide.  
 20 I have to be careful to try and -- you know, what  
 21 I remember at the time. I would say that if there was  
 22 conversation, it would be extremely unlikely that any of  
 23 the people at that meeting, in terms of decision-makers,  
 24 which is Paul or Rob or Craig, would have wanted to go  
 25 down that route.

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1 Q. Then we have two bullet points, test and launch with or  
 2 without BBA and LABC, and then, "Opt Out Of Above 18m".  
 3 Was there any serious discussion at the meeting  
 4 about whether you should opt out of the 18-metre  
 5 project?  
 6 A. I don't remember very well. I think that possibly Rob  
 7 may have given the opinion that Celotex should either  
 8 launch with a system and say, "This is the only system  
 9 in which you can use our products", or we should opt  
 10 out. But I think that Craig and Paul were keen to move  
 11 the project forward and to at least proceed to do some  
 12 testing. I'm not sure if a clear decision was made as  
 13 to whether -- how it would be marketed later. I'm sure  
 14 there is a reference somewhere to Craig Chambers saying,  
 15 "Well, let's get a pass and worry about it later".  
 16 Q. Right. You say you're sure there is a reference; is  
 17 there a reference you have seen?  
 18 A. A document that I have seen, where it says something  
 19 like, "Craig is of the opinion that this is not worth  
 20 worrying about until we have a test pass".  
 21 Q. Right. So was the upshot of the meeting -- well, you  
 22 tell me: what was the upshot of the meeting? What  
 23 decision was made as a result of this meeting about each  
 24 of these options?  
 25 A. I'm not sure that a decision was made at that meeting

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1 about any of those options. I think a decision was made  
2 about what would happen next, which is to say that  
3 Celotex would go forward with an 8414 test, and I think  
4 there's maybe another slide which is coming where it  
5 shows the choices of cladding panels which might be  
6 selected, and I think a decision was made that the  
7 8-millimetre fibre cement panel option would be  
8 selected.

9 Q. Indeed, if you go to slide 15 {CEL00011199/15}, we can  
10 see three choices there:

- 11 •" ACM Panel With Improved Barrier System (<50%)
- 12 •" A2 Panel With Standard Barrier (80%)
- 13 •" Cement Particle With Standard Barrier (90%)."

14 So, having shown you that, are you saying that the  
15 decision was made that the 8-millimetre fibre cement  
16 panel option would be selected, namely option 2,  
17 A2 panel?

18 A. Yes, that's correct.

19 Q. The 80%, was that the 80% pass chance?

20 A. Yes, I believe so.

21 Q. Right.

22 Is it right that, at this stage, Celotex wanted to  
23 use a cladding that was representative of what people  
24 would actually use in practice?

25 A. Yes, that's correct.

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1 Q. In other words, priced reasonably, was as aesthetic as  
2 possible and not too thick. I think you say that in  
3 your statement.

4 A. At this point, I think there is a strong view that  
5 Celotex don't want to go down the same route as  
6 Kingspan, and they want to use a panel which is  
7 representative of what people might use, and to market  
8 that openly.

9 Q. You say at paragraph 48 of your statement -- if you just  
10 go to that, please, at page 16 {CEL00010054/16} -- as  
11 we've seen, I think, before, there was a collective  
12 desire to use a panel that could and would be used by  
13 the market as it was tested. I've shown you that.

14 Did that include or exclude what Mr Egginton  
15 described as decorative cladding?

16 A. I think that Marley Eternit would be described as  
17 decorative cladding. I think it would meet that  
18 definition.

19 Q. Yes.

20 A. And I think that when John is talking about a decorative  
21 cladding, he might be looking at it from his own  
22 perspective, which are the materials that he's involved  
23 in, which is high-pressure laminates and aluminium.

24 Q. Right.

25 A. But I think that the view was formed by Celotex that

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1 there were types of decorative cladding, if you like, or  
2 representative claddings, which actually could pass  
3 an 8414 test.

4 Q. So is your recollection that you decided to use  
5 8-millimetre Marley Eternit, which was in fact used at  
6 the first test, despite Sotech's reservations as  
7 expressed to you about the prospects of passing with  
8 decorative cladding?

9 A. Yes, and I think that slide which says 80% shows that,  
10 actually -- well, demonstrates that there was some  
11 confidence in that selection.

12 Q. Yes, I see.

13 If we stick with your statement, paragraph 49,  
14 please, and go over the page {CEL00010054/17}, I just  
15 want to ask you about something you say there. You say  
16 at the top of the page:

17 "Considering all of this, it was collectively  
18 decided, with PE making the ultimate sign off, that we  
19 would use 8mm of Marley Eternit fibre cement cladding,  
20 which was common in the marketplace, and at an A2  
21 reaction, had a good fire rating. This would allow us  
22 to be transparent with the list of materials used in the  
23 test."

24 Now, you say "with PE making the ultimate sign off";  
25 was that because PE, Paul Evans, was ultimately the

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1 decision-maker in respect of the first test and what  
2 should comprise the components in the first test?

3 A. Yes, and that doesn't mean that Paul would have chosen  
4 those components, but it means that ultimately he would  
5 have to agree to and make a decision on what would  
6 happen next and what they would be. So obviously lots  
7 of different options were spoken about, and people had  
8 an opportunity to present a view. But, as I said  
9 before, my understanding is that Paul would ultimately  
10 make all final decisions as to what would happen.

11 Q. Yes. You say he would make all final decisions as to  
12 what would happen; that's your general --

13 A. Yes.

14 Q. -- view, knowledge, evidence about his role in this  
15 project?

16 A. That's right. I think Jon was closely supervised, but  
17 I don't think Jon had any autonomous decision-making  
18 process, and they would work very closely together. As  
19 I said before, the contact between individuals is not  
20 just based upon meetings, for example, where you see,  
21 "Here's a meeting and here's a record of a meeting";  
22 I mean, they're virtually on top of each other in their  
23 proximity, so they would converse informally a lot,  
24 I think.

25 Q. We will come to look a little bit more closely at that

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1 in due course, Mr Hayes.  
 2 Just on this paragraph, in the last sentence of  
 3 paragraph 49 there at the top of the page, you say:  
 4 "This would allow us to be transparent with the list  
 5 of materials used in the test."  
 6 It's right, isn't it, that this transparency was  
 7 important, because anybody who wanted to rely on  
 8 a BR 135 classification would need to know exactly what  
 9 the tested system was, wouldn't they?  
 10 A. That's correct.  
 11 Q. Is it right to say that you saw such transparency as  
 12 a positive factor which would distinguish Celotex from  
 13 Kingspan?  
 14 A. Yes.  
 15 Q. And that's because, as I think you confirmed earlier,  
 16 there was a view within Celotex at the time that the  
 17 Kingspan approach was not transparent, to put it at its  
 18 lowest?  
 19 A. Absolutely correct.  
 20 Q. And that Celotex did not want to copy that approach?  
 21 A. No, they didn't at this point in time.  
 22 Q. They didn't at this point in time. That qualification  
 23 is an interesting one. Do you mean that, at a point  
 24 later, Celotex did start to want to copy that approach?  
 25 A. Yes.

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1 Q. Now, we'll come to it, but in a sentence, can you tell  
 2 me when?  
 3 A. Well, from my perspective, it was after the second  
 4 successful test to 8414.  
 5 Q. You mean the second test, which was successful?  
 6 A. Yes.  
 7 Q. There was only one successful test.  
 8 A. I beg your pardon, I misspoke.  
 9 Q. No, I just want to be absolutely accurate.  
 10 A. Yes.  
 11 Q. So May 2014.  
 12 A. At some point after that, things would go wrong.  
 13 Q. Right.  
 14 Just focusing on the 8 millimetres of Marley Eternit  
 15 at the time it was selected, that's a cement or  
 16 cementitious fibre board, isn't it?  
 17 A. Yes.  
 18 Q. Did you think at the time that that was genuinely  
 19 representative of what was commonly used in the market  
 20 as a cladding panel?  
 21 A. Yes, I did, and although I didn't have an idea of how  
 22 much of the market it made up, I think I had  
 23 an understanding that it would be -- it would limit the  
 24 product in some ways, because if you have lots of  
 25 different cladding panels available in the market and

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1 they have lots of different fire ratings, and you are  
 2 going to have one in your test which has a pretty good  
 3 fire rating, that is going to limit you to what you  
 4 could use, and I think there was still this idea that  
 5 a field of applications report would open that up, and  
 6 that there would be the possibility of using fibre  
 7 cement, but also anything else which was at least as  
 8 good as that.  
 9 Q. At least as good in fire performance terms?  
 10 A. Fire performance, yes.  
 11 Q. Let's turn to the February 2014 test.  
 12 You attended that test, I think, didn't you?  
 13 A. That's correct.  
 14 Q. At Watford.  
 15 A. Yes.  
 16 Q. At the BRE Burn Hall there.  
 17 A. Yes.  
 18 Q. And that system that was tested included an 8-millimetre  
 19 Marley Eternit Natura cladding.  
 20 A. That's correct.  
 21 Q. Is it right that the fire was extinguished early, at  
 22 26 minutes, because the flames were extending past the  
 23 top of the rig?  
 24 A. That's correct.  
 25 Q. Now, you say in your statement at paragraph 54, if we

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1 can just go over the page {CEL00010054/18}, in the first  
 2 line:  
 3 "Myself, JR, PE and RW did not understand at the  
 4 time that flames out of the top of the structure would  
 5 constitute a Test failure."  
 6 Now, I just want to show you what Mr Roper says in  
 7 his statement and just ask you about the difference.  
 8 Can we go to {CEL00010052/12}, please. I would like  
 9 to look at paragraph 5.27 in the middle of the page  
 10 there. He says he attended the test, and in the second  
 11 line:  
 12 "The test did not go well and was stopped after  
 13 26 minutes. There was an obvious failure as the flames  
 14 reached the top of the test rig before the specified  
 15 time."  
 16 He says it was obvious. You say that you didn't  
 17 understand at the time that flames out of the top of the  
 18 rig would constitute a test failure.  
 19 Can you account for the difference in understanding  
 20 between you?  
 21 A. So I can only speak for my own recollection, but my  
 22 memory is that the primary result that you have to get  
 23 is outlined in BR 135, and it's to do with the  
 24 temperature rise of the thermocouples. But I think that  
 25 that temperature rise is limited to the first

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1 15 minutes, so it says you must not raise the  
 2 temperature by X within the first 15 minutes of the  
 3 test, and so even though the test is stopped at  
 4 26 minutes, you have the potential that actually you  
 5 have -- you would have met that criteria. So my memory  
 6 is that there was confusion between all of us, including  
 7 Jon and Rob, that we weren't sure whether just because  
 8 the test had been stopped at 26 minutes, which was  
 9 early, whether we might still be able to pass the test.  
 10 Q. I see. So it wasn't obvious to you that the fact that  
 11 the test had been stopped at 26 minutes was a sure sign  
 12 that it had failed?  
 13 A. No.  
 14 Q. Right.  
 15 Now, you say Phil Clark was present. Do you  
 16 remember him saying anything about what he could see?  
 17 A. I don't, really. I know that he would have said that,  
 18 "The test is stopped because the flames are extending  
 19 above the top of the rig", but I don't think he  
 20 explained explicitly that that meant it had failed.  
 21 Q. Right. So I think I've got your thoughts at the time,  
 22 at least: that you didn't think that the flames  
 23 extending past the top of the rig necessarily meant that  
 24 the test had failed?  
 25 A. No, although I know now that that is not correct.

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1 Q. Yes, I see.  
 2 Now, Mr Roper goes on to say at paragraph 5.28, in  
 3 the second line there:  
 4 "Phil told me he shared Rob's view that the  
 5 insulation had performed relatively well but that the  
 6 cladding panel had cracked and that once fire had  
 7 entered the cavity there was not much that could be  
 8 done."  
 9 Do you remember being party to that conversation?  
 10 A. No, I don't remember that. I think that -- I don't  
 11 think it was a formal conversation where everybody goes  
 12 off into a meeting room. I think that people are  
 13 standing around. So you've got the test rig, you've got  
 14 guys who are sort of making sure the fire's out, I think  
 15 that David and Parina are there from IFC, and you've got  
 16 people standing in sort of different groups in different  
 17 places. So I don't remember being party to that  
 18 conversation.  
 19 Q. Right.  
 20 Let me show you paragraph 5.29. Mr Roper says:  
 21 "Following the end of the test, Rob, Ian Cooper,  
 22 Phil and I [note you're not referred to there] had a  
 23 discussion whilst at the BRE testing centre. Phil said  
 24 that he had 'seen worse fails' and suggested that  
 25 Celotex might want to strengthen the outside of the test

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1 rig in order to counteract the cracking of the Marley  
 2 Eternit panels. I told Phil that the Marley Eternit  
 3 panels were also available in 12mm (in addition to the  
 4 8mm panels used in the test) and Phil responded that he  
 5 thought that thickening the panels to 12mm might  
 6 suffice."  
 7 Pausing there, were you party to that conversation  
 8 or did you know about it?  
 9 A. Not that I remember.  
 10 Q. Right. He goes on:  
 11 "Phil also joked that Celotex could use a 6mm cement  
 12 particle board like Kingspan ..."  
 13 Again, were you party or privy to that discussion or  
 14 did you hear about that?  
 15 A. I don't remember that or remember Phil offering that  
 16 comment.  
 17 Q. Do you remember whether the BRE gave any advice in  
 18 relation to the design of a test that might pass that  
 19 you were aware of at that time?  
 20 A. I think that Jon later told me about the comment from  
 21 Phil that the 12-millimetre board might be enough to  
 22 make it pass. I'm sure that a view was formed that the  
 23 test had done pretty well, that it was seen to be a very  
 24 close failure, and that a small change such as the  
 25 addition of 12 millimetres thickness would be enough to

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1 put it over the line.  
 2 MR MILLETT: Right.  
 3 Mr Chairman, I have four or five more questions  
 4 before coming to the end of this topic.  
 5 SIR MARTIN MOORE-BICK: Would you rather finish the topic  
 6 now?  
 7 MR MILLETT: I would rather finish the topic now, if that's  
 8 all right with the panel and the witness.  
 9 SIR MARTIN MOORE-BICK: All right. You are happy to go on  
 10 for another five minutes or so?  
 11 THE WITNESS: Absolutely, please do.  
 12 SIR MARTIN MOORE-BICK: Thank you.  
 13 Yes, Mr Millett.  
 14 MR MILLETT: Thank you, Mr Chairman.  
 15 After the test, you drove Mr Roper back to the  
 16 office. Do you remember that?  
 17 A. I think that Rob was driving, and then --  
 18 Q. Right.  
 19 A. -- someone was in the passenger seat and one of us was  
 20 in the back.  
 21 Q. Right. Do you remember that Mr Roper called Paul Evans  
 22 en route --  
 23 A. I do.  
 24 Q. -- to tell him the result of the test?  
 25 A. Yeah.

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1 Q. Do you remember, from your side, hearing what he told  
 2 Mr Evans?  
 3 A. I think I'm correct that the call was on speakerphone.  
 4 Q. So you could hear both sides of the conversation?  
 5 A. Yes.  
 6 Q. Can we go to paragraph 54 of your statement on page 18  
 7 {CEL00010054/18}. You say in the third line:  
 8 "... we discussed the fact that we felt as though  
 9 the fact that the Test had been stopped before the  
 10 30-minute mark suggested the rig had not passed but that  
 11 if the rig could pass the thermocouple data it might  
 12 just pass."  
 13 Was it you who said that?  
 14 A. No. I believe actually it was primarily a conversation  
 15 between Jon and Paul.  
 16 Q. Right.  
 17 A. I think the bit about the thermocouples might have been  
 18 discussed in the car before that call.  
 19 Q. I see, that's before the call.  
 20 Then you go on to say at paragraph 55:  
 21 "JR telephoned PE from the car as he wanted to find  
 22 out how the First Test had gone ..."  
 23 The "he" would be PE there:  
 24 "... he seemed extremely keen to find out from the  
 25 BRE as soon as possible what the outcome of the First

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1 Test was. There was a lot of emotion from JR and PE  
 2 related to the First Test result."  
 3 Why do you say that?  
 4 A. I think it was very clear from the conversation. Paul  
 5 was -- sounded very disappointed that it had  
 6 passed(sic), but also he was telling Jon, "Okay, do you  
 7 think it might have passed? When do you think we can  
 8 find out? Okay, you need to get on to Phil, you need to  
 9 get on to the BRE and find out."  
 10 Q. Right. When you say a lot of emotion, can you be bit  
 11 more specific?  
 12 A. So very fast talking. You know, when people speak, you  
 13 can hear their tone goes up and becomes higher. There's  
 14 a lot of quick backwards and forwards. He's expressing  
 15 that, you know, "We need to find out as quickly as  
 16 possible". And also hope, as in, you know, "Oh, so you  
 17 think we might have passed? So there's a chance that we  
 18 passed? Yeah, okay, we need to explore that. We need  
 19 to get on to them."  
 20 Q. Okay, thank you. You've brought that to life very well.  
 21 Can I just ask you to look at paragraph 56 at the  
 22 bottom of the page. You say:  
 23 "Following pressure applied from JR on the BRE to  
 24 inform us of the First Test result, PC telephoned JR  
 25 confirming that we had failed the First Test on the

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1 basis of the fire emerging from the top of the  
 2 structure. My involvement in the wider discussion that  
 3 ensued following the failure was limited."  
 4 When was the telephone call from Phil Clark to  
 5 Mr Roper, do you remember?  
 6 A. So I never witnessed the telephone call. I think it  
 7 would have been something that I was told about,  
 8 possibly by Jon. My impression was that it was fairly  
 9 quickly after the first test or after the date of the  
 10 first test, possibly within a couple of days.  
 11 Q. Right, I see. So this is something Jon Roper passed on  
 12 to you, but you weren't on that call?  
 13 A. No.  
 14 MR MILLETT: I see. Thank you very much.  
 15 Mr Chairman, is that a convenient moment? I've come  
 16 to the end of this topic.  
 17 SIR MARTIN MOORE-BICK: Yes, that suits you, does it?  
 18 MR MILLETT: Yes.  
 19 SIR MARTIN MOORE-BICK: We will have a break now, Mr Hayes,  
 20 so we can all get some lunch. We will come back at  
 21 2.05, please.  
 22 Again, I have to ask you, please don't talk to  
 23 anyone about your evidence or anything to do with it  
 24 while you're out of the room.  
 25 THE WITNESS: Thank you.

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1 SIR MARTIN MOORE-BICK: All right? Thank you very much.  
 2 (Pause)  
 3 Thank you, 2.05, please.  
 4 (1.05 pm)  
 5 (The short adjournment)  
 6 (2.05 pm)  
 7 SIR MARTIN MOORE-BICK: Right, Mr Hayes, all ready to carry  
 8 on?  
 9 THE WITNESS: Yes, sir.  
 10 SIR MARTIN MOORE-BICK: Thank you.  
 11 Yes, Mr Millett.  
 12 MR MILLETT: Mr Chairman, thank you very much.  
 13 Mr Hayes, can I ask you to go to your statement at  
 14 page 19 {CEL00010054/19}, please and look at  
 15 paragraph 58. You say in the beginning of that  
 16 paragraph there:  
 17 "Given that we thought we had narrowly failed the  
 18 First Test and utilising the detail in the report, we  
 19 started to draw conclusions about what caused the fire  
 20 to spread to the top in the way that it did."  
 21 You identify the cladding and the fire barriers as  
 22 issues, but you then go on to say at the end of the  
 23 paragraph:  
 24 "Collectively, we were content with the remaining  
 25 components in the rig, including the use of RS5000,

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1 which did not change from the First Test to the Second  
 2 Test.”  
 3 Do you know who made the decision to carry out  
 4 a second test?  
 5 A. Erm ...  
 6 (Pause)  
 7 Sorry, I don't mean to pause, I'm just trying to be  
 8 accurate, because I suspect that the information would  
 9 have been given to me by Jon informally, but my  
 10 understanding is that the test -- the decision to  
 11 undertake a second test would have been made by  
 12 Paul Evans and Craig Chambers.  
 13 Q. Right.  
 14 If you just look up at the top of the page, at the  
 15 end of paragraph 56, you say in the last sentence there:  
 16 "The decision to undergo a Second Test was  
 17 ultimately made by upper management and eventually  
 18 filtered down to me via JR."  
 19 By upper management, do you mean ...?  
 20 A. Paul and Craig would have ultimately made that decision,  
 21 I believe.  
 22 Q. Right.  
 23 Do you know whether Craig Chambers and Paul Evans  
 24 were involved in a detailed discussion of the components  
 25 of the failed test and an examination of what precise

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1 components had failed and how they could be improved for  
 2 a second test?  
 3 A. No, I don't. There was not a discussion that  
 4 I personally witnessed.  
 5 Q. Right.  
 6 Can we then turn to the design of the second test.  
 7 I think you were involved in discussions about potential  
 8 amendments to do your best to ensure a pass of the  
 9 second test, weren't you?  
 10 A. Correct.  
 11 Q. That was with Mr Roper; yes?  
 12 A. Yes.  
 13 Q. And Paul Evans?  
 14 A. Yes.  
 15 Q. And Rob Warren too?  
 16 A. That's correct.  
 17 Q. Would you say that Paul Evans was closely involved in  
 18 those discussions?  
 19 A. Yes, and I don't think it was a formal process or  
 20 a meeting; I think there would have been lots of  
 21 discussions, so I might have had a discussion with just  
 22 Rob, I might have had a discussion with just Jon, there  
 23 might have been a discussion when all four people were  
 24 in a room. But rather than being -- we'll have  
 25 a meeting and there'll be a date and an invitation, it

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1 was just people were in very close proximity to each  
 2 other.  
 3 Q. Right. But you have explained -- so sorry, I cut you  
 4 off, do you want to continue?  
 5 A. No.  
 6 Q. You have explained where physically Paul Evans' and  
 7 Jon Roper's offices were, you say one on top of the  
 8 other. Where was your office in relation to theirs?  
 9 A. Downstairs in the same building.  
 10 Q. So how often every day would you encounter them and  
 11 discuss matters, business matters?  
 12 A. Most days I wouldn't see them, and that is because my  
 13 day job was to answer the phones and answer emails,  
 14 which was in a separate office on a separate floor.  
 15 Q. Right.  
 16 A. So actually I wouldn't go upstairs, because we had our  
 17 own kitchen facilities and things like that, I wouldn't  
 18 go upstairs and I wouldn't see them the vast majority of  
 19 days.  
 20 Q. I see. So you wouldn't bump into them on a daily basis?  
 21 A. No, not necessarily. Not that there was any  
 22 segregation, it was just that -- so you might see  
 23 someone coming into the front of the building because  
 24 there was a shared front door, but ...  
 25 Q. Okay.

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1 One of the changes that was made as between the  
 2 first test and the second test was the decision to  
 3 increase the thickness of the Marley Eternit cladding  
 4 panels from 8 millimetres to 12 millimetres, wasn't it?  
 5 A. That's correct.  
 6 Q. Yes. Do you know who made that suggestion?  
 7 (Pause)  
 8 A. I don't know who made that suggestion. I think it would  
 9 have come out from discussions amongst people and been  
 10 generally agreed.  
 11 Q. We know that Jon Roper was involved in that discussion,  
 12 because he told us. What about Paul Evans? Do you know  
 13 that he was involved in that discussion?  
 14 A. Yes, he was.  
 15 Q. How do you know that?  
 16 A. Because I believe I would have been present at  
 17 discussions where it was being discussed where he was in  
 18 the room and an active part of that discussion.  
 19 Q. Right.  
 20 Did Mr Roper ever tell you that he had discussed  
 21 that thickening of the exterior cladding panels for the  
 22 test with Mr Clark of the BRE, Phil Clark?  
 23 A. Yes, he did. It was discussed, and I think that Jon  
 24 told me that Phil had suggested to him that a thickening  
 25 of the cladding panels may well be enough to take the

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1 test from a failure to a pass.  
 2 Q. Now, you have said that, in your understanding,  
 3 Celotex's aim was to test a fairly representative  
 4 system. Did you have any concerns, after the first test  
 5 and in designing the second test, that in using  
 6 a cladding panel of that increased thickness of  
 7 12 millimetres instead of 8, that might undermine that  
 8 approach and consequently the likely marketability of  
 9 RS5000?  
 10 A. I think I thought at that stage that using a thicker  
 11 cladding panel -- it would still be an actual product  
 12 which people use, so 12-millimetre Marley fibre cement  
 13 would still be a panel which was advertised and offered  
 14 to the market and used by people, so in that respect it  
 15 would still be representative. But I think I would have  
 16 thought that it would narrow down the options of what  
 17 people would be able to use, because I think the idea  
 18 had always been that a field of applications report  
 19 might be able to take something which had been tested  
 20 and passed and then allow people to maybe change some  
 21 components.  
 22 So the awareness was that if you went from  
 23 8 millimetres to 12 millimetres, you're using something  
 24 which is thicker, so that is going to limit what you can  
 25 do with it, because of --

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1 Q. Yes, I see.  
 2 A. Sorry.  
 3 Q. Yes, I see.  
 4 If you go to paragraph 60 of your statement, please,  
 5 on page 20 [CEL00010054/20], you can see there that you  
 6 say in the first line:  
 7 "... it was decided that the Marley Eternit cladding  
 8 was still a marketable choice of product and that  
 9 increasing the thickness could be the most effective way  
 10 to improve its performance."  
 11 Did you have any concerns that, if RS5000 passed, it  
 12 would still be marketable only if used with  
 13 Marley Eternit panels of that thickness, in other words  
 14 12 millimetres, or you say that it was still possible  
 15 but limited, more limited than 8 millimetres?  
 16 A. It would limit it. I think if you have a market and you  
 17 have lots of different cladding panels with lots of  
 18 different fire ratings, the one that you have tested,  
 19 I think the feeling is you're going to be limited to  
 20 anything which is as good as that or better. So the  
 21 higher up you go with what you've tested, everything  
 22 below that line now is something which you're not going  
 23 to be able to do. So --  
 24 Q. Yes, I follow.  
 25 Staying with paragraph 60, Mr Hayes, you go on in

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1 the middle of that paragraph to say:  
 2 "Given the level of urgency I sensed from PE and JR,  
 3 the fact that authorisation was given so quickly for the  
 4 Second Test and my knowledge of the new product budget  
 5 from Saint Gobain, I felt that there was significant  
 6 pressure from upper management to pass the Second Test.  
 7 This was heightened by the fact that the Test was so  
 8 expensive. We didn't want to be in a position where  
 9 12mm cladding got us closer but the test was still  
 10 failed."

11 When you refer to significant pressure from upper  
 12 management to pass, what do you mean by that?

13 A. So after the first test, and as I explained before,  
 14 things happened very quickly. So I think the project  
 15 had started in 2014 and I think the first test was in  
 16 February, and so that's a reasonable amount of time for,  
 17 I guess, research and thinking about what things are  
 18 going to happen. So now discussions are happening very  
 19 quickly, so there's discussions happening around: okay,  
 20 what are we going to do with the second test, how is  
 21 that going to pass?

22 I know just from speaking to the tasks that Jon was  
 23 given. So he had a lot of things to do. Some of those  
 24 things I helped him with, for example to contact the  
 25 people who had built the rig to start with and get them

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1 to build a second rig. We would have to order all of  
 2 the materials for that, which is to say everything which  
 3 goes into building that rig, from the steel frame to the  
 4 sheathing board to the -- well, the insulation of course  
 5 is ours -- to the cladding panels. He's got to arrange  
 6 with the BRE for another test rig. In fact, I think  
 7 that the BRE didn't have a rig available for us to test  
 8 as quickly as they wanted to re-test, and I think they  
 9 had three rigs available, and two of them were steel  
 10 frame rigs and one of them was a masonry rig, and the  
 11 masonry rig I think is concrete blocks inside a frame,  
 12 and I actually think that because Jon had been told he  
 13 had to do it as quickly as possible, they actually paid  
 14 the BRE an extra £5,000 to knock out the blocks so that  
 15 a steel frame could be installed.

16 Q. Oh, right.

17 A. So I think they -- I think I'm correct in remembering  
 18 this, that they actually paid more money to fast-track  
 19 it, that's a kind of way to say it.

20 Q. Right.

21 Do you know, just following that up a bit, whether  
 22 that extra £5,000 was in the original budget for the  
 23 second test or whether Joe Mahoney had to be  
 24 re-approached to expand the budget to include that extra  
 25 payment?

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1 A. I'm afraid I don't know that.  
 2 Q. Can I ask you, you say "upper management", you refer to  
 3 "upper management" being behind the pressure; can you  
 4 just tell us who that was? Was that, again,  
 5 Craig Chambers and Paul Evans?  
 6 A. Yes, so I know from Jon, of course, that he is being  
 7 given these instructions by Paul, and those instructions  
 8 are, "Okay, you need to do this, you need to do that, it  
 9 needs to be as quickly as possible".  
 10 In terms of -- so there's a degree of assumption  
 11 when I'm saying that that pressure is coming down from  
 12 Craig to Paul to Jon, and that -- I guess that  
 13 assumption and that impression is formed from some of  
 14 the things that I said earlier, so discussions about  
 15 an imminent budget in -- being given to Saint-Gobain and  
 16 people from Celotex having to travel to Paris to deliver  
 17 that budget, and that budget -- a key part of that  
 18 budget was that it had to be from new products. Only  
 19 RS5000 would satisfy that requirement.  
 20 I knew that Craig followed the project very closely.  
 21 So, as an example, the meeting that we had, which was  
 22 the update meeting that we discussed earlier, Craig was  
 23 an active part of that discussion. It wasn't a case of  
 24 Craig sort of sitting back there and saying, "Oh, okay,  
 25 you bring me up to speed, and, okay, crack on". My

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1 impression of that meeting was that he understood the  
 2 technical nuances around the testing very well, and that  
 3 he was very keen in that meeting for that project to go  
 4 forward and as quickly as possible.  
 5 Q. Was that the 4 November 2013 meeting?  
 6 A. Yes, that's correct.  
 7 Q. Were there any meetings between November 2013 and  
 8 May 2014 that you were at with him?  
 9 A. No.  
 10 Q. Or that you were aware of where he had attended which  
 11 had discussed the project?  
 12 A. No, and I wouldn't necessarily have expected to have  
 13 been invited to those.  
 14 Q. Okay.  
 15 Now, did you think at the time that there would be  
 16 any consequences for you personally if the second test  
 17 failed?  
 18 A. No. No, I didn't.  
 19 Q. No. Can we look at paragraph 61, same page  
 20 {CEL00010054/20}. You say:  
 21 "61. I therefore went to JR, RW and PE with  
 22 a suggestion that we also include an additional board of  
 23 material behind the cladding, just at the point of the  
 24 fire barriers. This, in conjunction with the thicker  
 25 cladding would increase the time it took for any fire to

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1 progress through the cladding and consequently climb the  
 2 rig.

3 "62. The board I suggested was a 6mm magnesium  
 4 oxide board placed behind the cladding (the 'Additional  
 5 Material'). This would be used in conjunction with the  
 6 now 12mm thick layer of the cladding. JR and PE agreed  
 7 to adopt this approach in principle with PE having the  
 8 final sign off. However, they also decided to amend the  
 9 thickness of the cladding at the point where the  
 10 Additional Material was placed, from 12mm to 8mm thick,  
 11 to try and ensure continuity of the cladding surface  
 12 across the rig."

13 Now, just breaking that down a little bit, it looks  
 14 from that -- and I've read it all to you -- that you  
 15 were the person who suggested the 6-millimetre magnesium  
 16 oxide board; yes?

17 A. That's correct.

18 Q. And they were the ones -- they, JR and PE -- who came up  
 19 with the amendment of the thickness of the 12-millimetre  
 20 cladding to bring it down to 8 to try to ensure  
 21 continuity of the cladding surface throughout.

22 A. Yes.

23 Q. Yes.

24 Now, just looking at that a little bit more closely  
 25 still, are you saying that you made the suggestion of

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1 the 6-millimetre magnesium oxide result of the pressure  
 2 that you observed or felt to do the best that you could  
 3 to stop the second test failing?

4 A. Yes.

5 Q. So you were the one who came up with the 6-millimetre  
 6 magnesium oxide. How did you come up with that idea?

7 A. I think it had been -- when we had had the discussions  
 8 at Sotech, John Egginton had given the idea that perhaps  
 9 the test could pass with an improved fire barrier, and  
 10 so I kind of -- that was the seed of -- that  
 11 fire barriers are an important part of what might make  
 12 the test pass or fail. So that's kind of where the idea  
 13 that fire barriers are an important part of that system  
 14 is.

15 Q. Just to be clear, is that your note of the  
 16 3 October 2013 meeting, {CEL00011052}, fourth bullet  
 17 point down, where we saw earlier reference --

18 A. Yes, the reference to fire barriers.

19 Q. Yes, I see.

20 A. So I think that suggestion which had initially been put  
 21 forward by John before the first test, we were now or  
 22 I was now revisiting in my mind, and I think part of  
 23 that was to look at the fire barriers that Kingspan had  
 24 used on their successful test, because I think they  
 25 described it as being a stainless steel aluminium grille

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1 product, which, although I don't think they named it --  
 2 so I think in some way we found out what that had been  
 3 called, and it became apparent that that was no longer  
 4 available. So it seemed that John's idea of using  
 5 a double system was not going to work, because actually  
 6 one of the things of the two was actually no longer  
 7 available, and I don't think that there was any similar  
 8 products available and, as I understand it now,  
 9 I actually don't think such products -- which is to say  
 10 a stainless steel cavity barrier -- are actually very  
 11 common at all.

12 So then I guess the mind turns to: fire barriers are  
 13 important; how else could the performance of the  
 14 fire barrier be improved? And I think the feeling was  
 15 after the first test that, once the cladding panels had  
 16 cracked, fire moved into the cavity which is between the  
 17 insulation and the cladding panel and then travels up  
 18 within that cavity, and it's the job of the  
 19 fire barriers to stop that happening. So the fire will  
 20 go up in that cavity but, once it hits the fire barrier,  
 21 the fire barrier will stop it and it won't go any  
 22 further, and I think that we thought that the  
 23 fire barrier is not very effective once the cladding has  
 24 gone, because the cavity is between two things,  
 25 something at the front and something at the back, and

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1 then the cavity fire barrier blocks that gap. So if you  
 2 have the thing at the front, you have the thing at the  
 3 back and you have the fire barrier, then the fire is  
 4 stopped on its journey. So if any of those three things  
 5 are no longer there, for example if the cladding panel  
 6 is cracked and fallen away, you will still have the  
 7 fire barrier, but would fire actually go around the  
 8 barrier and continue, and so the barrier would be  
 9 ineffective. Not because the barrier itself has failed,  
 10 but because I guess that part of the construction has  
 11 failed.

12 So the feeling was: if the cladding panel is still  
 13 there, then the fire barrier will do its job, and that  
 14 will contribute to a passing of the test. So the idea  
 15 of reinforcing the cladding at the point of the  
 16 fire barrier means that the fire barrier will now be  
 17 able to do its job, retard fire from moving up, and  
 18 of course that is the pass and fail criteria of the  
 19 test. So, therefore, hopefully that will contribute to  
 20 it successfully passing the test.

21 Q. Two questions from that.

22 Was it you, first, who came up with the idea of  
 23 reinforcing -- your word -- the cladding at the rear  
 24 face of it where the fire barrier would meet it?

25 A. I remember it being my idea, yes.

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1 Q. Secondly, was it you who came up with the idea of  
 2 magnesium oxide as the material which you would place  
 3 there as the reinforcement?

4 A. I believe so, but I don't think that was a conscious  
 5 choice of saying, "Okay, what would be the best material  
 6 to do this? I think magnesium oxide would be a good  
 7 choice". I think it was because magnesium oxide was  
 8 being used already as the sheathing board.

9 Q. Yes.

10 A. And so it was logical, "Okay, we can just use more of  
 11 the same".

12 Q. Okay, so can we just cut a long story short in this  
 13 sense --

14 A. Sorry.

15 Q. No, I'm not being critical at all of your answer, it's  
 16 helpful to hear exactly what the thinking was.

17 Does it come to this: you thought that the best way  
 18 of getting this to pass the test was to keep the cavity  
 19 in place, as opposed to having the panels crack, and  
 20 therefore the best way of doing that would be to  
 21 reinforce them with a non-combustible substrate, the  
 22 same as you were already using as the sheathing board --

23 A. Yes, that's correct.

24 Q. -- namely magnesium oxide? Yes, that's very helpful  
 25 thank you.

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1 Now, you say in paragraph 61 {CEL00010054/20} that  
 2 you went to JR, RW and PE with that suggestion. Do you  
 3 remember when you went to them with that suggestion?

4 A. I don't remember exactly when that was. It was at  
 5 a time after the first test and while thoughts were  
 6 being turned to how the second test -- the composition  
 7 of the second test would be put together. I don't  
 8 believe it was, as I said before, a kind of a formal  
 9 meeting or a gathering when people were there, and  
 10 I think it was a combination of informal discussions.

11 So I can remember, for example -- and I think I say  
 12 this later -- having just an informal discussion with  
 13 Rob Warren about it, just the two of us, and that was  
 14 downstairs in the technical centre offices, and I think  
 15 I can remember having a chat with Jon Roper about it  
 16 when it was just the two of us, and I think I can  
 17 remember a conversation where everybody was in the room.

18 Q. Right.

19 I want to focus on Paul Evans, because I think  
 20 you'll perhaps know in general terms from his evidence  
 21 that he, I think I can safely say, denies being told  
 22 about the 6-millimetre magnesium oxide. Perhaps that's  
 23 a mischaracterisation of his evidence, but I want to get  
 24 your evidence.

25 How clear in your mind do you recollect telling

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1 Paul Evans that you should use or they should use  
 2 a 6-millimetre magnesium oxide board behind the  
 3 cladding?  
 4 A. I can remember a specific conversation, although not in  
 5 a huge amount of detail, and it was, I believe, upstairs  
 6 where Paul and Jon's office was, and Paul was there, and  
 7 Jon was there, and I was there, and it was  
 8 a conversation around this idea. And from that specific  
 9 recollection, but from also my general impressions as  
 10 well and many other things that I witnessed, there's no  
 11 doubt at all in my mind that Paul Evans knew about the  
 12 missing material. And I would go further, and I think  
 13 I say this in my statement, that Paul would have to  
 14 ultimately make the decision that that was what was  
 15 going to be the composition of the second test rig.  
 16 Q. Yes. You say there is no doubt in your mind at all  
 17 about that?  
 18 A. None whatsoever.  
 19 Q. Thank you.  
 20 He -- and, again, I don't want to misrepresent his  
 21 evidence -- denies that. How can you account for that?  
 22 (Pause)  
 23 A. The short answer is I can't, and that I can only speak  
 24 for my own testimony, and anything that I say would be  
 25 a ... I'm not sure what the word is, a kind of

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1 supposition on my part.  
 2 SIR MARTIN MOORE-BICK: I was going to interrupt and thought  
 3 I had better let the answer run on, but I don't think  
 4 it's for this witness to say whether he can explain  
 5 Mr Evans' evidence, is it?  
 6 MR MILLETT: Very well.  
 7 I think the answer was a perfectly elucidating  
 8 answer.  
 9 Now, given that Celotex had used magnesium oxide as  
 10 the sheathing board for the February test, you knew it  
 11 was non-combustible. Perhaps that was the idea. Yes?  
 12 A. Yes.  
 13 Q. Had you had any conversations with Mr Clark of the BRE  
 14 about using magnesium oxide as a reinforcement panel  
 15 behind the thickened rainscreen or cladding panel?  
 16 A. No.  
 17 Q. Did you have any conversations with anybody else at the  
 18 BRE about that?  
 19 A. No.  
 20 Q. You were, I think, aware -- and you say this in your  
 21 statement at paragraph 72 {CEL00010054/23} -- that this  
 22 was not representative, that is the addition of  
 23 a reinforcing magnesium oxide board behind the cladding  
 24 panel, of what would commonly be used in the market.  
 25 A. Yes.

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1 Q. Given that it wasn't representative of what would  
 2 commonly be used in the market, why did you suggest it?  
 3 A. I think in my mind it was for a couple of reasons. One  
 4 would be there was still on the table this idea of the  
 5 field of applications report, so it could be that,  
 6 whilst it was not representative, if the test passed  
 7 really, really well, there might still be the  
 8 opportunity for a field of applications report to allow  
 9 people to later on, you know, change that component.  
 10 And the other thing is I don't think it had -- well,  
 11 there may have been discussions which I was not party  
 12 to, but in my mind I thought there was still the  
 13 potential for Celotex to offer that as a complete system  
 14 to the market, albeit with a hugely reduced scope of  
 15 perhaps people who might be interested in that, but  
 16 there may still be people who would want to do that,  
 17 based upon the fact that PIR was still going to be a lot  
 18 thinner than Rockwool and would -- or mineral wool, and  
 19 that would solve some problems, and possibly if the  
 20 market became more educated to the rules, which is to  
 21 say things should be a proper system as opposed to how  
 22 Kingspan was doing it, then, you know, there still might  
 23 be people who would find that attractive.  
 24 And there was also a feeling, I think -- and  
 25 I thought at the time it was a feeling shared by others,

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1 but perhaps it wasn't -- that, "Let's just get over the  
 2 line, let's get a pass and let's see what happens  
 3 later".  
 4 Q. So just on that last part of your answer, was the main  
 5 reason to suggest the magnesium oxide there in order to  
 6 maximise the chances of a pass?  
 7 A. Yes, it was.  
 8 Q. You were also aware that any BRE classification, BR 135  
 9 classification, would only apply to the tested system  
 10 and nothing else?  
 11 A. I was aware of that, yes.  
 12 Q. So if the intention was to be transparent about the  
 13 tested system, an unrepresentative test wasn't going to  
 14 be of much use. Did you understand that?  
 15 A. I knew that it would be of less use.  
 16 Q. Right.  
 17 Can we go to paragraph 72 of your statement, please,  
 18 {CEL00010054/23}. You say there at the bottom of the  
 19 page:  
 20 "From conversations between JR and PE to which I was  
 21 privy, I was aware that there were concerns that a rig  
 22 with the Additional Material present would not be  
 23 representative of what the market would want to use in  
 24 their buildings. I was the most junior person in the  
 25 room at any of these conversations. It was not usual to

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1 include extra material at specified points throughout  
 2 a building and it was a matter of common sense that it  
 3 would be burdensome and more expensive to incorporate  
 4 into any such construction. Based upon their concerns  
 5 regarding the marketability of the product and I assume  
 6 the opinion they must have formed about the likelihood  
 7 that the rig would have passed the Second Test without  
 8 the Additional Material (based on the view expressed by  
 9 PC), a decision was made and conveyed to me that it  
 10 would not be referred to within the BRE's Final Report  
 11 or included in Celotex marketing of the rig. I was not  
 12 involved in the making of this decision and I cannot  
 13 recall who specifically told me, but it is most likely  
 14 to have been JR or PE."

15 Was the intention always to conceal the use of what  
 16 you have defined as the additional material?  
 17 A. No. Well, for me, definitely not. And I don't believe,  
 18 and I didn't believe, that that was in the mind of other  
 19 people prior to the passing of the second test.  
 20 Although -- and that really is my testimony. But  
 21 looking at other evidence I've seen, it may have been in  
 22 the mind of others, but for me, there was no doubt in my  
 23 mind that, up until after the second test, the intention  
 24 had always been that we would work with what we had got.  
 25 Q. Now, you say at the top of page 24 {CEL00010054/24}

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1 within paragraph 72 "a decision was made". To the best  
 2 of your recollection, Mr Hayes, who made that decision?  
 3 A. I've given this a lot of thought, because when I put  
 4 together this first statement, I couldn't remember and  
 5 don't remember who specifically told me that, what the  
 6 conversation was, who was present and when it was, and  
 7 I knew and was told that this was likely to be  
 8 an extremely critical point, and so I've tried hard to  
 9 remember that. But I simply cannot remember exactly  
 10 what the occasion was when I was told or who told me,  
 11 and so I've written that it is most likely to have been  
 12 Jonathan Roper or Paul Evans.  
 13 Q. Yes, as you say in the last sentence, and you can't  
 14 improve on that sitting here today?  
 15 A. I can't, and I wish that I could.  
 16 Q. That's very fair, thank you.  
 17 Did that decision, when conveyed to you, come as  
 18 a surprise?  
 19 A. Yes, it did.  
 20 Q. Did you have any concerns at the time that that decision  
 21 was made and conveyed to you that concealing the  
 22 presence and identity of the additional materials, as  
 23 you define them, was a dishonest way of presenting the  
 24 test?  
 25 A. Yes, I believed and believe and know it to be wholly

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1 wrong and dishonest.

2 SIR MARTIN MOORE-BICK: Mr Millett, do you mind if I just  
 3 interrupt and clarify one thing?

4 Mr Hayes, if we look at the top line of the document  
 5 on the screen, you're saying that a decision was made  
 6 within Celotex by the people you suggest that it "would  
 7 not be referred to within the BRE's Final Report".

8 Now, that suggests that a decision was made in  
 9 relation to the form of the BRE report. Is that what  
 10 you mean to say?

11 A. Yes, I believe that's correct.

12 SIR MARTIN MOORE-BICK: Now, that suggests that someone in  
 13 Celotex either had spoken to the BRE or intended to  
 14 speak to the BRE to make sure that it wasn't mentioned.  
 15 Is that what you recall?

16 (Pause)

17 A. I'm just taking a moment to try to be accurate.

18 I don't think that's what I'm saying, and the reason  
 19 I'm taking some time is because I have seen many other  
 20 pieces of evidence. I'm trying hard to think what  
 21 I would have known at the time.

22 But I know a couple of things. One of the things is  
 23 that the official BRE position is that actually the  
 24 report is based upon information that you provide to  
 25 them, which is to say they would expect you, I believe,

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1 to say, "This was the rig that was -- these were the  
 2 components that were used". And also I think, and this  
 3 is where I'm trying -- because I've seen evidence about  
 4 this, is that they sent through a draft report which did  
 5 not mention that material.

6 So it could be that there was a degree of  
 7 opportunism in there where, instead of actually saying  
 8 to the BRE, "Don't include this", that perhaps they're  
 9 going to take the opportunity to not correct a mistake  
 10 that the BRE has made, albeit I believe that there was  
 11 an individual person at the BRE who was aware of the  
 12 presence of the magnesium oxide board on that rig, and  
 13 I've no doubt that we will come to that shortly.

14 SIR MARTIN MOORE-BICK: Yes, all right. Thank you.

15 MR MILLETT: Mr Chairman, we will come, I think, to examine  
 16 that evidence a little bit --

17 SIR MARTIN MOORE-BICK: I'm sure we shall, but the  
 18 particular formulation of his recollection seemed to me  
 19 to suggest that it was worth exploring.

20 MR MILLETT: Yes, no, absolutely, it is, and we will come to  
 21 some documents a little bit later on that exact point.  
 22 But thank you for that, that's very helpful.

23 Can I then just ask you to look, please, at  
 24 paragraph 62 of your statement, page 20  
 25 {CEL00010054/20}, please. You say there -- and we have

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1 been through this already -- in the third line :

2 "JR and PE agreed to adopt this approach in  
3 principle with PE having the final sign off."

4 Were you aware of whether the decision had to be  
5 signed off by anybody senior to Mr Evans, or was  
6 Mr Evans, as you say, having the final sign-off?

7 A. No, I'm not aware that that would be the case. I think  
8 that -- in that respect, I think Paul would be able to  
9 make that decision.

10 Q. Right.

11 Do you know whether, when making that decision, that  
12 sign-off, Mr Evans went to Mr Chambers or sought the  
13 approval of anyone more senior in adopting the approach  
14 you've described?

15 A. No, I don't know. My knowledge at the time would have  
16 been that I wouldn't have known that. I think  
17 Craig Chambers was the only person who was senior to  
18 Paul, who reported directly to him, and there were no  
19 other layers of management between Paul and Craig.

20 Q. Right.

21 Have you any reason to believe, to the best of your  
22 recollection, that Mr Chambers was involved in that  
23 decision?

24 A. No.

25 Q. Can we go to {CEL00003089}, please. This is really

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1 a timing point. This is an email, halfway down page 1,  
2 from you to Rob Warren on 26 February about a meeting  
3 with the cavity fire barrier manufacturer, "Also now on  
4 the rota". This is shortly after the first failed test,  
5 about two weeks later.

6 At that stage, meeting the cavity fire barrier  
7 manufacturer, was that Siderise?

8 A. It was, yes.

9 Q. Was there discussion at that stage of the use of the  
10 6-millimetre magnesium oxide in conjunction with the  
11 fire barriers, or did that come later?

12 A. No, there was no discussion with Siderise about that at  
13 all.

14 Q. Right.

15 We then turn to the May 2014 test itself. Can we  
16 look at {CEL00008508}. This appears to be a copy of  
17 a design. Page 1 is the design of the rig for the  
18 second test, isn't it? At least in terms of the  
19 location of the thermocouples.

20 A. Yes, it is.

21 Q. Then page 2 {CEL00008505/2} is a copy of your notes of  
22 the materials for the second test, and I think you say  
23 that you used this to assist Mr Roper in ordering the  
24 materials; is that right?

25 A. Yes, I think the primary purpose of this is to work out

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1 how much of every different component you might need.

2 Q. Right.

3 Halfway down that page we see, under "Rails":  
4 "Magnesium oxide (6mm) 6x2.88m2."

5 So you had decided by that stage, or at the time you  
6 wrote this document, that that's what you needed.

7 Are you able to tell us when you think you generated  
8 this document or wrote it?

9 A. I'm not, but I believe that it is ... I guess towards  
10 the end of the period of time between the first and  
11 second test, because this is not a document where we're  
12 thinking about what we're going to do; this is  
13 a document, I guess, we know what's happening, actually  
14 what Jon's got to do is go and get all this stuff  
15 together and get it delivered down to the BRE, and  
16 I think what I'm helping with there are how much of  
17 different things you might need.

18 Q. I see. So we see the magnesium oxide 6 millimetres, we  
19 see the Marley Eternit 12 millimetres, and the  
20 measurement for that, and then we see, "Eternit (8mm)  
21 6x3.6 m2".

22 A. Yes.

23 Q. And that's a reference to the thinner cladding material.

24 Do you know where you bought the magnesium oxide  
25 6 millimetres from, as opposed to the magnesium oxide

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1 12 millimetres, which was the sheathing board, which we  
2 can see referred to at the top of this page?

3 A. No, I actually don't know where that was ordered from.

4 Q. The reason I ask is because we haven't seen a delivery  
5 note for that material. Do you think you acquired it  
6 from the same source as the 12-millimetre sheathing  
7 board or a different source?

8 A. I have to say, I wasn't involved in that aspect of it.  
9 Equally, I've never seen or been shown that document.

10 I think it would be odd to have gone somewhere else.

11 The only reason that you would go somewhere else is if  
12 whoever you were buying the 12 millimetres from said,

13 "Oh, yeah, you can get 6 millimetres, but we don't  
14 particularly do it, you will have to go somewhere else".

15 Q. Were you involved in that?

16 A. No.

17 Q. As far as you can tell us, do you know how long in  
18 advance before the test it was delivered to the BRE?

19 A. I don't remember when any of these or would have known  
20 when any of these things were delivered to the BRE, but  
21 I think that because the entire timeframe between the  
22 first and second test was so quick, I'm guessing that  
23 a lot of this stuff is likely to have been done sort of  
24 just in time, if that makes sense.

25 Q. Yes. Well, we can get a sense of that from the delivery

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1 notes of the other materials, which tend to be in April.  
 2 From your knowledge, do you know who would have  
 3 signed for this material at the BRE?  
 4 A. No, I don't.  
 5 Q. Right.  
 6 A. I think the BRE Burn Hall was on their overall site, so  
 7 I remember that, having to get on to the overall site,  
 8 you actually went through a checkpoint with a guard and  
 9 a barrier. So I would think that they would have  
 10 a proper goods-in delivery system where somebody would  
 11 have to go to the barrier and they'd say, "I've got this  
 12 invoice and it's got to go there", and they'd say,  
 13 "Okay, you go to there", and I think I remember,  
 14 actually, that Phil, who I believe practically ran the  
 15 Burn Hall, it was very common for them to receive  
 16 materials from everybody, because they were doing lots  
 17 of testing with lots of different people, so they were  
 18 having materials being delivered for tests all the time,  
 19 and so I think they would have had a proper procedure  
 20 for goods-in, if you like, where they would have  
 21 a person who would sign things, check things in.  
 22 And, of course, they were dealing with  
 23 manufacturers' property, and so they would have to make  
 24 sure that things were put into a secure area and  
 25 wouldn't be lost or misplaced or damaged.

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1 Q. So far as you know, was Phil Clark aware that  
 2 6 millimetres of magnesium oxide was to be used in this  
 3 test in the way you have described?  
 4 A. Yes.  
 5 Q. How do you know that?  
 6 A. Because of the conversation that I heard between Jon and  
 7 Phil Clark, but also, in a more general sense, the  
 8 Burn Hall was a facility which had three test rigs and  
 9 then a couple of offices attached to it, and I think  
 10 that Phil ran it and was based there, so his main office  
 11 was in the same building, and I think that they did lots  
 12 of tests of different types, and I think that he would  
 13 have been constantly -- because of the layout of it,  
 14 I think he would have been constantly walking past that  
 15 rig and looking at it every single day from its initial  
 16 day one of construction to its last day of dismantling.  
 17 Q. Do you know how long it took to construct?  
 18 A. I don't. I would -- but from the first test, I believe  
 19 there was a few days' worth of labour.  
 20 Q. How long was it up for after the test, do you know?  
 21 A. I don't know, but I believe that they were quite keen to  
 22 get things down, because it might be that somebody else  
 23 wanted to use that rig for their own test.  
 24 Q. You didn't attend the second test, but you did attend  
 25 the rig afterwards.

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1 A. I did, yes.  
 2 Q. What was the point of looking at the rig after the test?  
 3 A. Because I was interested in it, and because, frankly, it  
 4 was just a day out from my normal job, which was pretty  
 5 much a call centre type role, and it was, "Let's have  
 6 a day out, let's do something different", drive up there  
 7 with Jon, probably have some lunch, have a day out from  
 8 doing my normal duties.  
 9 Q. How many times did you visit the test rig after the  
 10 test?  
 11 A. So I think I put in my statement that I was there on at  
 12 least one occasion.  
 13 Q. Yes.  
 14 A. It would not be impossible that it was two. So to be  
 15 fair to myself, I've said it might have been more than  
 16 one occasion.  
 17 Q. Yes, you did.  
 18 A. But I ...  
 19 Q. Can we look at paragraph 67 of your statement at page 22  
 20 {CEL00010054/22}, please. I'm going to read it all to  
 21 you. You say:  
 22 "At a visit to the rig after the Second Test,  
 23 I recall a conversation between PC [Phil Clark] at the  
 24 BRE and JR [Jon Roper] where, when asked by JR, PC  
 25 agreed that the rig had passed the Second Test so easily

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1 that he suspected that it would have passed even without  
 2 the Additional Material, just using the thicker  
 3 cladding. My recollection of the conversation is that  
 4 it was led by JR and PC's opinion in this regard was  
 5 expressed in agreement with JR. We were on the second  
 6 floor in an office looking down at the Second Test rig;  
 7 we all got on well with PC and he was telling us about  
 8 what it was like to work at the BRE, including that they  
 9 had dealt with the burning of the cows when the mad cow  
 10 outbreak occurred."  
 11 Now, it looks from that as if you're saying -- can  
 12 you just confirm for us, Mr Hayes -- that Phil Clark  
 13 knew about the 6-millimetre magnesium oxide sitting  
 14 behind the 8 millimetres of Marley Eternit.  
 15 A. Yes, that is correct.  
 16 Q. Are you in any doubt about that?  
 17 A. No doubt at all.  
 18 Q. Indeed, as we can see from the photographs from the  
 19 test, it was obvious that there were two kinds of  
 20 cladding panel being used because there are two  
 21 different colours.  
 22 A. Yes.  
 23 Q. One is white, and that's the 12-millimetre  
 24 Marley Eternit, and one is orange, and that's the  
 25 8-millimetre Marley Eternit, isn't it?

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1 A. That's correct.  
 2 Q. I think you make the same point at paragraph 80 of your  
 3 witness statement. Just visit that, please, page 26  
 4 {CEL00010054/26}. You say there:  
 5 "Although at the time I did not turn my mind to  
 6 whether the BRE as a body had an awareness that the  
 7 Additional Material was omitted from the report, and  
 8 I do not now believe that it did, I knew that PC, an  
 9 individual representative of the BRE had such awareness  
 10 and was content in himself that the Additional Material  
 11 would not have made a difference to the Second Test  
 12 result. I took comfort from this and it supported my  
 13 decision not to challenge the omission of the Additional  
 14 Material going forward."  
 15 Is the basis of your belief as you state it there  
 16 that Phil Clark knew about the additional material at  
 17 the very least because he had acknowledged the fact  
 18 during your mad cow conversation, if I can call it that?  
 19 Is that right?  
 20 A. Yes, that is correct.  
 21 Q. Phil Clark was the senior consultant at the BRE and had  
 22 signed the report. He signed both the draft and the  
 23 final version of the full test report; that's right,  
 24 isn't it?  
 25 A. Yes.

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1 Q. Why do you seek to draw the distinction that you do here  
 2 at paragraph 80 between Phil Clark as an individual and  
 3 the BRE as a corporate entity?  
 4 A. I think that probably at the time of doing my first  
 5 statement, I think it felt fairly obvious that this was  
 6 a very important and serious matter, and that it is  
 7 likely a question would be: do you think the BRE as  
 8 a body knew, and I think I probably tried to address it  
 9 in advance.  
 10 Q. Right. Why do you say you don't think the BRE as a body  
 11 was aware, even though Phil Clark was? What's the basis  
 12 for the distinction that you're making?  
 13 (Pause)  
 14 A. Well, one, I don't think it is very likely that actually  
 15 the BRE as a body would undertake those actions; and,  
 16 secondly, I guess because of the chain of events later,  
 17 in terms of the provision of the draft test report and  
 18 the email asking Phil to remove a photograph which  
 19 showed the missing material.  
 20 Q. Right. I don't wish to be rude, Mr Hayes, but that  
 21 sounds a bit like speculation.  
 22 A. Okay.  
 23 Q. Is that fair, that in fact, the basis on which you're  
 24 drawing that distinction is speculative?  
 25 A. So perhaps a better way to do it is that I knew that

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1 Phil knew. Yes, so perhaps I'm speculating now, and  
 2 perhaps that is speculation in my statement, although  
 3 it's my belief, but that belief is based upon just  
 4 an assumption of mine rather than a specific knowledge,  
 5 I suppose.  
 6 Q. Right.  
 7 Are you suggesting from what you know that  
 8 Phil Clark kept the additional material secret from  
 9 Stephen Howard, who I think was his boss at the BRE?  
 10 A. I've never actually considered that point, but I think  
 11 that he would have had to have done that, because -- and  
 12 I'm not sure I would have known this at the time, but  
 13 I understand now that there is a process within the BRE  
 14 where the report is peer reviewed, and those people have  
 15 to or should look at the notes that Phil and his team  
 16 put together and the photographs and plans and other  
 17 things, and so there must have been a -- well, a failure  
 18 in communication, to put it one way, between the time  
 19 where Phil does his report and the time when the BRE or  
 20 another person at the BRE peer reviews and authorises  
 21 that report.  
 22 Q. Is your evidence that he knew that you, Celotex, were  
 23 intending to conceal the presence of the additional  
 24 material, and that he went along with that but didn't  
 25 share that with either Stephen Howard or the peer-review

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1 team?  
 2 A. I think to draw a clear distinction between what I know  
 3 and what I'm assuming, what I know is that Phil Clark  
 4 knew about the missing material or the 6-millimetre  
 5 magnesium oxide; I cannot say to you that I know or have  
 6 any factual basis to make the claim that he did or  
 7 didn't discuss that or conceal it from other people at  
 8 the BRE.  
 9 Q. If Phil Clark knew about the presence of the additional  
 10 material, are you able to explain why none of the drafts  
 11 and the final version of the full test report makes any  
 12 reference to the 6-millimetre magnesium oxide or the  
 13 8 millimetres of Marley Eternit?  
 14 A. No, I'm not.  
 15 Q. Are you saying that your view at the time, understanding  
 16 at the time, was that even though Phil Clark had that  
 17 knowledge -- well, what was your understanding at the  
 18 time of the fact that even though, as you say,  
 19 Phil Clark had that knowledge, there was nonetheless no  
 20 reference to those materials in the test reports?  
 21 A. So obviously there is a draft test report, so Phil has  
 22 put together that draft test report, but I think at that  
 23 period of time, there are no drawings of the second  
 24 test, so he's relying on drawings from the first test  
 25 which don't show that material.

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1 Q. He would have known that they were inaccurate, though,  
2 wouldn't he --  
3 A. Yes.  
4 Q. -- come the second test?  
5 A. But then why do a draft report at all then before you  
6 have all the information that you're supposed to have in  
7 order to produce it?  
8 So the answer is I don't know why the first test  
9 report came through without that missing material.  
10 Q. Did you ever discuss it with him?  
11 A. No, I never discussed it with Phil.  
12 Q. Did you think at the time that Phil Clark had  
13 deliberately omitted reference to the additional  
14 material or had just accidentally overlooked it, even  
15 though he knew about it?  
16 SIR MARTIN MOORE-BICK: Well, Mr Millett, I wonder whether  
17 that's something we ought to ask this witness.  
18 MR MILLETT: Well, I think it is, because --  
19 SIR MARTIN MOORE-BICK: If he has some grounds for drawing  
20 a conclusion one way or the other, he can tell us what  
21 they are.  
22 MR MILLETT: It's the same point as I think you put to the  
23 witness.  
24 Can I try a slightly different way, then, and maybe  
25 we'll come to it in a moment, but when you saw the

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1 reports come back without the reference to it, given the  
2 fact that you knew Mr Clark knew about the presence of  
3 the additional material, what was your understanding  
4 about the reasons why it wasn't referred to?  
5 A. I don't know, and I don't know whether it was that he  
6 had just put together the draft report, and that report  
7 would be on the basis that it was a draft and it would  
8 be brought up to date by Celotex providing updated  
9 information, and that it was never intended to be more  
10 than exactly that: a draft, and it didn't matter that it  
11 was not accurate. That seems to me to be the most  
12 likely explanation.  
13 Q. Now, just continuing a little bit more with this theme,  
14 you say -- and the Chairman has picked this up with you  
15 before -- that the decision was made by Celotex that the  
16 presence of the magnesium oxide would not be referred to  
17 in the report.  
18 Given, as we've established, that it wasn't  
19 identified in the draft, did that mean a decision not to  
20 correct the draft so as to provide a complete  
21 description of the system, or does it mean that there  
22 was a prior agreement or decision that the draft  
23 shouldn't contain reference to the magnesium oxide?  
24 A. Well, the short answer is: I don't know. I am aware,  
25 looking at evidence and hearing other people's evidence,

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1 of a kind of timeline, if you like, which is that -- I'm  
2 referring to things here which I don't really have  
3 contemporary knowledge of, but we know that ... well,  
4 I guess we know there was a board meeting where the  
5 material was discussed. There was another meeting,  
6 I think, between Paul and Jon and Paul Reid, and that  
7 seemed to be the morning that the first draft of that  
8 test has arrived. So they obviously are in possession  
9 of a test report at this point in time. It doesn't have  
10 the missing material in it. And so the question is: is  
11 then a decision taken which is opportunistic, "Okay,  
12 you know, here we have a test report, the missing  
13 material's not in it, we could go on from here", or  
14 actually was it something that was -- a decision had  
15 been made earlier than that, and actually no matter what  
16 happened, they were going to not reference that  
17 material?  
18 Q. I see.  
19 Do you recall any discussions yourself with  
20 Phil Clark or anybody else from the BRE about the  
21 omission of the 6-millimetre magnesium oxide or the  
22 8 millimetres of Eternit?  
23 A. No, so the only evidence that I have in terms of Phil's  
24 knowledge is that conversation which I witnessed,  
25 although I think that there is strong documentary

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1 evidence to show that he knew in -- which is to say the  
2 photograph which was asked to be removed from the test  
3 report.  
4 Q. Right. I'm going to come to that now.  
5 Can we look, please, at {CEL00001350}. This is the  
6 email of 1 July 2014 which attached the first draft of  
7 the test report which had been dated 2 June 2014, which  
8 goes back with notes on it from Jon Roper to Phil Clark,  
9 and we can see the beginning of the email at the foot of  
10 page 1. We can see you were copied in to this email, as  
11 was Paul Evans.  
12 If we go to page 2 {CEL00001350/2}, you can see in  
13 the second paragraph:  
14 "As previously discussed, could you also replace  
15 figure 18 with the attached photographs as we want to  
16 show a close up of the condition of our insulation below  
17 and above fire break with the intumescent fired off. If  
18 you feel you also have a suitable photograph, then  
19 please include."  
20 Now, when you saw this email, did you understand  
21 that Jon Roper was asking the BRE to remove what, on the  
22 face of the report, was the only element of the report  
23 which showed the presence of the magnesium oxide layer?  
24 A. Yes, I did.  
25 Q. Did you know anything of the background to that request?

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1 A. I believe in my statement I may have referenced  
 2 a conversation which I witnessed regarding that  
 3 photograph. I believe -- my memory isn't brilliant, but  
 4 I have a memory of being upstairs in possibly Jon's  
 5 office and Paul Evans was there, they were discussing  
 6 the photograph and the reasons for the removal of that  
 7 photograph, and I think it was because it clearly showed  
 8 the missing material which they didn't want to appear in  
 9 the report, and that the purpose of asking Phil to  
 10 remove that photograph was for no other reason than to  
 11 remove a photograph which was, I think, a dead giveaway,  
 12 if you like, that that missing material was on the test  
 13 rig.  
 14 Q. Did you yourself have a discussion about the request to  
 15 remove that photograph from this draft test report with  
 16 Jon Roper?  
 17 A. No, I think that was the only ... I think that was the  
 18 only discussion that I was part of or witnessed, was  
 19 that one discussion which I've just outlined. I don't  
 20 think I had a separate discussion with Jon about it.  
 21 Q. What about Paul Evans? Did you have a discussion with  
 22 Paul Evans about the removal of this photograph from the  
 23 report?  
 24 A. No.  
 25 Q. You didn't.

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1 Nonetheless, you could see from the email that he  
 2 was copied in to the email and to the request. What was  
 3 your understanding at the time about how much he was  
 4 involved in or knew about that request?  
 5 A. I think he absolutely knew exactly what that was, and  
 6 I would imagine that it would have been -- well, I don't  
 7 know, and I don't want to, again, say things that  
 8 I don't know, but my understanding and everything of how  
 9 Paul had been the ultimate decision-maker up until then,  
 10 that would lead me to believe that he would have asked  
 11 Jon to do that. And again, there's absolutely no doubt  
 12 in my mind, based upon that conversation which  
 13 I witnessed, that Paul was completely aware of the  
 14 reason for that photograph being asked to be removed,  
 15 and I think it's most likely that actually he had asked  
 16 Jon to do that.  
 17 Q. Was it your view or understanding at the time that  
 18 Celotex was engaged in a deliberate attempt to create  
 19 a misleading test report?  
 20 A. Yes. That's exactly what was happening.  
 21 Q. Were you concerned about that?  
 22 A. I was very concerned about that.  
 23 Q. Why didn't you challenge it?  
 24 A. It's not an easy answer -- question to answer. My  
 25 understanding was, and now, is that a decision had been

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1 made by the senior management of Celotex. I didn't know  
 2 who I should speak to or who I could speak to.  
 3 I lacked, I guess, the life experience to find the right  
 4 way forward, and it was a ... it was a failure of  
 5 courage and a failure of character and a failure of  
 6 moral fibre on my part not to do so.  
 7 Q. Mr Hayes, thank you for that answer.  
 8 Now, just turning back to Phil Clark again, I just  
 9 want to see if I can understand what was going on, to  
 10 the best of your recollection, and obviously I'm not  
 11 asking you to peer into his mind, I want your  
 12 understanding.  
 13 If, as you say, Phil Clark knew about the presence  
 14 of magnesium oxide in the test, and also knew that there  
 15 was no reference to it in the list of components of the  
 16 test as described in the report, why did you think he  
 17 put figure 18 in at all if it would have, as it did,  
 18 reveal the presence of magnesium oxide?  
 19 A. I don't know. I think that it's a very obvious  
 20 photograph, because that photograph shows all of the  
 21 outer cladding removed, and not only -- and the only  
 22 thing that is left in that photograph is the  
 23 6-millimetre magnesium oxide at the top, but also, very  
 24 importantly, it shows a section of magnesium oxide board  
 25 which has been left at level 2. So that photograph, if

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1 you wanted a photograph which was a clear illustration  
 2 of the presence of that material, you could not have  
 3 chosen a clearer photograph, and I wonder if -- I wonder  
 4 why he's done that, I wonder if he has actually done  
 5 that deliberately to say, "Look, here you go, this is  
 6 the missing material".  
 7 Q. Now, we know about the request to remove it. We also  
 8 know that it was left in when the final report came  
 9 through at the end of July.  
 10 Are you able to enlighten us as to why the BRE or  
 11 Phil Clark personally left the photograph in, as what  
 12 became figure 19?  
 13 A. Whatever answer I give would be a guess, because  
 14 I actually don't know.  
 15 Q. Right. Well, then, that's the answer.  
 16 A. Okay.  
 17 Q. Now, I'm going to try to cut a long story short with  
 18 this.  
 19 Do you know from your knowledge that the drawings  
 20 for the rig, for the purposes of the final report, were  
 21 not updated to show the presence of the 6-millimetre  
 22 magnesium oxide or the 8-millimetre Marley Eternit  
 23 Natura?  
 24 A. Yes, I am aware of that.  
 25 Q. Do you know why that was?

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1 A. I believe that at that time a decision had been made  
 2 that that missing material was not to be referenced  
 3 within the test report, and I would say that it is  
 4 a deliberate action to say to the BRE, "Here are the  
 5 plans that you need to use in your report", and the  
 6 reason that the drawings do not show that material is  
 7 because they are being deliberately left off to aid in  
 8 that process.  
 9 Q. And who was involved in that particular decision, the  
 10 decision about the drawings?  
 11 A. I think it would have stemmed from the decision for that  
 12 material not to be shown, because once that decision has  
 13 been made, it logically follows that you have certain  
 14 tasks to do which will follow on from that decision.  
 15 And really I think that everything that happened after  
 16 that, whether it's the photograph, whether it is the  
 17 drawings, whether it is -- and I'm sure we'll come to  
 18 this -- the production of later marketing materials and  
 19 literature, I think everything stems from that decision.  
 20 And so it would be a -- if you have made that decision,  
 21 it's going to be a necessary -- one necessary task will  
 22 be to get the drawings updated and to make sure that  
 23 material is not shown.  
 24 Q. Now, on the screen in front of us we've still got the  
 25 email chain of 1 July 2014. Can I ask you to go back to

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1 that email string and look at the top, please, of page 1  
 2 {CEL00001350/1}. This is another email from Jon Roper  
 3 on that same day, 1 July 2014, to Paul Evans and copied  
 4 to you, subject "FW: Test Report Comments". It says:  
 5 "Paul,  
 6 "We'll discuss in more depth later on when we do the  
 7 official handover but I've spoken to Luke @ Simco this  
 8 morning and he expects to have the updated drawings of  
 9 the rig complete by tomorrow if not end of week.  
 10 "I've asked him to send these through to you in my  
 11 absence. Can you please run these by Jamie to check all  
 12 the details and send through to Phil @ BRE the relevant  
 13 drawings to replace figures 4, 5 & 6 of the test report.  
 14 Phil will then implement these into the report with the  
 15 other amends and put forward to Steve Howard (his boss)  
 16 to complete and sign off."  
 17 Then in the last paragraph, he says:  
 18 "Jamie is aware of what needs amending on the  
 19 drawings so he will be able to identify that the correct  
 20 changes have been made."  
 21 Do you accept that you were involved in the changes  
 22 or lack of changes to the drawings?  
 23 A. Yes, I do.  
 24 Q. Did you have a conversation with Mr Evans, as indicated  
 25 by Jon Roper here, about the relevant drawings that

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1 should be sent to Phil at the BRE?  
 2 A. I'm not sure that I did. I don't remember, I'm afraid.  
 3 Q. Did you have input into the actual changes in the  
 4 drawings? Did you have a discussion with Simco about  
 5 what changes should be made?  
 6 A. No, I never had any direct contact with them ever, at  
 7 all, I don't believe.  
 8 Q. Did you identify that the correct changes had been made,  
 9 as Jon Roper indicates you would do in the last  
 10 paragraph of that email?  
 11 A. So there are changes that need to be made to the  
 12 drawings, and they're changes which would need to be  
 13 made anyway, because -- moving aside the missing  
 14 material -- there were actually legitimate changes  
 15 between the first rig and the second rig, and the  
 16 primary one being the change of thickness from  
 17 10 millimetres to -- sorry, from 8 millimetres to  
 18 12 millimetres for the main cladding.  
 19 Q. Yes.  
 20 A. And I think there were also some errors on the first  
 21 drawing which had always stood, and I think one of those  
 22 errors was the thickness of the plasterboards,  
 23 for example, on the steel framing system.  
 24 Q. Thank you.  
 25 As you told us before, the drawings that, as far as

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1 you know, went to the BRE were incomplete because they  
 2 omitted any reference to the 6-millimetre magnesium  
 3 oxide or the 8-millimetre Eternit?  
 4 A. That's correct.  
 5 Q. And that was deliberate?  
 6 A. Yes.  
 7 MR MILLETT: Yes.  
 8 I'm going to turn to product literature.  
 9 Mr Chairman, this may be a convenient moment for  
 10 a break.  
 11 SIR MARTIN MOORE-BICK: Yes, it probably is, isn't it?  
 12 Well, we'll have a short break now, Mr Hayes. We  
 13 will come back at 3.35, please, and while you're out of  
 14 the room, no talking to anyone about your evidence or  
 15 anything related to it, please.  
 16 THE WITNESS: Thank you very much.  
 17 SIR MARTIN MOORE-BICK: Thank you very much.  
 18 (Pause)  
 19 Thank you, 3.35, please.  
 20 (3.17 pm)  
 21 (A short break)  
 22 (3.35 pm)  
 23 SIR MARTIN MOORE-BICK: Right, Mr Hayes, all ready to carry  
 24 on?  
 25 THE WITNESS: Yes, sir.

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1 SIR MARTIN MOORE-BICK: Thank you.

2 Yes, Mr Millett.

3 MR MILLETT: Mr Hayes, can I just revisit two things in your  
4 evidence.

5 First, when the decision was first made to add the  
6 additional materials to the second test test rig, was  
7 that when a decision was made also to conceal it as best  
8 you could from the public, or was that decision made  
9 later?

10 A. No, I think that we touched upon this earlier, and in my  
11 mind there was no doubt at all that -- until after the  
12 second test, certainly for me, and I can't speak for  
13 others, that there was only good intentions to do things  
14 correctly. I'm not aware of any feeling to conceal that  
15 material until after the second test.

16 Q. Doing the best you can, do you know when or how long  
17 after the second test that decision was made?

18 A. No, I don't.

19 SIR MARTIN MOORE-BICK: Mr Hayes, I feel I ought just to  
20 press you a little further on that, because there are  
21 others who may have other views about this.

22 It might be said that the rig as proposed for the  
23 second test was so far from being a representative rig  
24 of what might be produced in practice as to be useless  
25 unless one did suppress the existence of the magnesium

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1 oxide boards. What do you say about that?

2 A. I think it's similar to a question that I have answered,  
3 and I think that I expressed that: first of all, there  
4 was a kind of, I believe, "Let's worry about it later"  
5 attitude, which is to say, "Okay, well, let's get a test  
6 done and we'll see what we can do with that"; that there  
7 were still thoughts that a field of applications report  
8 route might be available, even though the test itself  
9 would not be representative, that people may be able to  
10 use that test data and extrapolate from it in a field of  
11 applications, especially if the result was very good,  
12 I guess, so to speak. So --

13 SIR MARTIN MOORE-BICK: I have to say, at the moment I'm  
14 finding it difficult to see how anyone could have  
15 thought that data derived from a rig that was so far  
16 removed from anything likely to be built in practice  
17 could be the subject of any useful field of application  
18 report.

19 A. I think you're absolutely correct and, as I sit here  
20 today, I don't believe that it could be.

21 SIR MARTIN MOORE-BICK: That raises the question, you see,  
22 whether you really did believe what you're telling us.

23 A. Because I think that there was not a great level of  
24 understanding, certainly from myself, as to exactly  
25 what a field of applications report would look like, how

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1 far it would be able to go. So we'd had the meeting at  
2 IFC where Peter had expressed the view that, yes,  
3 you know, you could get a field of applications report,  
4 there might be wide variety of scope that that could be  
5 the case, and it would depend upon the performance of  
6 the test in that -- you know, as it had performed on the  
7 day.

8 It may also have -- no, and that's my answer.

9 SIR MARTIN MOORE-BICK: All right. Thank you.

10 Now, Mr Millett, you had another question and  
11 I rather jumped in ahead of you.

12 MR MILLETT: No, no, I want to follow up on that, if I may,  
13 Mr Chairman.

14 You say that the decision to conceal it came later,  
15 and that the decision beforehand was just to go ahead  
16 and get the test done and maybe you could get a field of  
17 application report for it.

18 What was it about the results of the test that meant  
19 that you could no longer be candid and open and honest  
20 about the presence of the additional materials which  
21 then caused the decision to conceal it to be made?

22 A. Well, I think there's an assumption there that I had  
23 been part of those discussions or part of that decision,  
24 and so therefore I would be able to illuminate you on  
25 that, but the reality is that -- and I also think

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1 there's a difference between when a decision was made  
2 and when a decision was communicated to me, which may be  
3 different things. And so ... sorry, just to circle back  
4 to the question -- which I kind of have actually  
5 forgotten what it was.

6 Q. That's okay, let me try it a different way.

7 You told us that, as far as you were aware, before  
8 the test was done, the idea was to be open about the  
9 presence of additional material because maybe you could  
10 get a field of application report which would allow that  
11 very unusual and unrepresentative make-up to be used in  
12 practice. You get the results of the test. What was it  
13 about the results of the test that meant that Celotex  
14 changed its mind and thereafter decided to conceal the  
15 presence of the additional material?

16 A. The answer to that question briefly is: I don't know.

17 Q. Did you ever seek to find out, given what you told us  
18 about your belief that there would be openness and  
19 candour about the presence of the additional material  
20 before the test?

21 A. No.

22 Q. Why is that?

23 A. I don't know. I think I was unhappy with what I'd been  
24 told, and I didn't feel that anybody would want to  
25 perhaps have that discussion with me.

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1 Q. Did you even seek to try?  
 2 A. No, I think I had a clear impression of what was going  
 3 to occur and what they wanted to do.  
 4 Q. Is it really right that before the test you really  
 5 thought that Celotex were going to be open and honest  
 6 about the presence of the additional material?  
 7 A. Yes, that is correct.  
 8 Q. The other question I wanted to visit with you is the  
 9 rationale for the presence of the magnesium oxide layer.  
 10 You say that it was to reinforce the cladding, at the  
 11 back of the cladding, where it met the fire barriers.  
 12 We had taken from other evidence that it was, in  
 13 a sense, to protect the thermocouples at level 2 and at  
 14 the top of the rig from getting too hot. Is that part  
 15 of the thinking, or was that part of the thinking, or  
 16 was it simply to do with reinforcing the cladding panels  
 17 so that they stayed intact?  
 18 A. Well, I think that those things are related, because, as  
 19 the fire travels up, you then trigger the failure  
 20 conditions of the test, which is to say the thermocouple  
 21 raise in temperature, and so by having an effective  
 22 fire barrier design, you are increasing the, I guess,  
 23 performance of the rig, and that helps you to achieve  
 24 that success and that success is based around the  
 25 thermocouples.

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1 Q. Right.  
 2 Putting it slightly shortly -- or let me ask it  
 3 openly and shortly: why did you decide to apply the  
 4 additional 6-millimetre magnesium oxide at the level 2  
 5 thermocouples and at the top of the rig as opposed to  
 6 anywhere else on the rig?  
 7 A. I think it would have been related to the position of  
 8 the level 2 thermocouples.  
 9 Q. Right.  
 10 A. And I also think it would have been related to flames  
 11 going off the top of the rig as well.  
 12 Q. How would the presence of the magnesium oxide prevent  
 13 the flames coming up from the top of the rig?  
 14 A. It would be exactly the same reason, because the --  
 15 I think the flames coming out the top of the rig, they  
 16 would be coming out of that gap, and so if you have  
 17 a cavity barrier which addresses that gap, then that  
 18 will not happen.  
 19 Q. I want to turn to product literature --  
 20 SIR MARTIN MOORE-BICK: I'm sorry, Mr Millett, I'd now like  
 21 to follow up on your question.  
 22 Do you know who actually decided where the magnesium  
 23 oxide boards would be placed? Because there is no  
 24 drawing for anyone to follow, is there?  
 25 A. No, there isn't, and I ...

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1 SIR MARTIN MOORE-BICK: Do you know who took that decision?  
 2 A. No, I don't, is the short answer. It may be that it  
 3 came out of -- as a consensus, or perhaps it is just  
 4 that is logically where they would need to be  
 5 positioned.  
 6 SIR MARTIN MOORE-BICK: Well, if you think about it, some  
 7 magnesium oxide boards were delivered to the BRE's  
 8 Burn Hall, or wherever they stored them. Patch Jones  
 9 I think was the person who actually built the rig; is  
 10 that right?  
 11 A. I'm not sure who actually constructed the second rig.  
 12 I think that might be correct from evidence. My --  
 13 SIR MARTIN MOORE-BICK: Well, someone did, anyway.  
 14 A. Yeah, sure.  
 15 SIR MARTIN MOORE-BICK: Whoever was in charge of  
 16 constructing the rig must have either been given free  
 17 hand to decide what to do with these boards which, on  
 18 the face of it, didn't have any place on the rig, or was  
 19 told either what to do with them or where to put them.  
 20 A. Well, I think --  
 21 SIR MARTIN MOORE-BICK: Who told whom what to do with them,  
 22 if you know?  
 23 A. The first thing is you're correct, there's no way that  
 24 the person building it, which is to say Patch Jones,  
 25 would have decided where they were going to go, so he

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1 would have received a clear instruction from Celotex to  
 2 do that. I think in terms of who told him, I think that  
 3 would have been Jon, because Jon was at the rig,  
 4 directing it, and some of that memory -- or some of that  
 5 understanding is not contemporaneous, but I have seen  
 6 Jon's statement.  
 7 SIR MARTIN MOORE-BICK: Right.  
 8 A. So -- but, equally, I don't think that Jon would have  
 9 been there on the day going, "Hmm, where are we going to  
 10 put this? I think they've got to go there". I'm sure  
 11 that it would have been decided before then where  
 12 they're going to go in a general sense. "Okay, this  
 13 line needs to go here, which is below the second level  
 14 thermocouples, and yes, we've got one at the top as  
 15 well".  
 16 SIR MARTIN MOORE-BICK: All right. Thank you very much.  
 17 Yes, Mr Millett.  
 18 MR MILLETT: Just following up on what you told  
 19 the Chairman, is what you told the Chairman something  
 20 that Jon Roper told you, or are you just trying to piece  
 21 together the --  
 22 A. Honestly, I think I took that from Jon's evidence, where  
 23 he describes, actually, I believe, that he was there and  
 24 telling him what to do.  
 25 Q. I see. So you can't add, by reference to your own

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1 recollection of the events at the time, to what  
 2 Jon Roper has already told the Inquiry?  
 3 A. No.  
 4 Q. Right, I see.  
 5 Can I then turn to product literature .  
 6 Overall question: did you have any input into the  
 7 drafting of the product literature for Celotex RS5000  
 8 when it was launched in August 2014?  
 9 A. Yes, I did.  
 10 Q. Let's see how we go.  
 11 Can you tell us in general terms which parts of that  
 12 product literature you drafted?  
 13 A. I was asked to make contributions to a document which  
 14 was called the rainscreen cladding specification guide.  
 15 Q. Any other document, like the datasheet or the compliance  
 16 guide?  
 17 A. I was asked to contribute a blog, which was to be placed  
 18 on the Celotex website. That is the only recollection  
 19 that I have, both then and now, of my contribution to  
 20 the literature .  
 21 I was shown an email, and that email references me,  
 22 although I'm not included in it, and it says -- I think  
 23 it's an email to Tina Smith, and it says "Jamie, can you  
 24 please" -- "Can you please go to Jamie and get three to  
 25 six bullet points about the installation of RS5000 for

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1 the rainscreen cladding application sheet", which is  
 2 different from the datasheet, but I've got no memory and  
 3 there's no evidence to say that she ever did that.  
 4 Q. Okay. Can I pick you up on the specification guide,  
 5 {CEL00000013/3}, please. This is the specification  
 6 guide, and if we look at the third page, we can see the  
 7 introduction to that document.  
 8 Did you draft any of that?  
 9 A. Yes, I did a draft of some of that and sent it to  
 10 Lizzie Seaton, and I think that that draft was then used  
 11 to come up with this final version.  
 12 Q. I have a document to show you, but perhaps we can take  
 13 it more quickly. The first three paragraphs of that  
 14 page and the first two sentences of the fourth paragraph  
 15 I think, from the record, are what you drafted; is that  
 16 right?  
 17 A. Erm ... yes, you're absolutely correct. So there is  
 18 an email which basically says exactly what I said to  
 19 Lizzie, so that can be referred to. But if you are  
 20 telling me that that matches the first three paragraphs  
 21 and the first sentence, then I'm prepared to accept  
 22 that.  
 23 Q. Let me just do it very quickly, if I can.  
 24 {CEL00009596}, please. This is an email chain between  
 25 you, Jonathan Roper, Lizzie Seaton and Rob Warren

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1 relating to the rainscreen cladding literature . On  
 2 page 3 {CEL00009596/3} you send an email saying, "Please  
 3 find attached design considerations". Do you see that?  
 4 A. Yep.  
 5 Q. What's attached I think is a draft. That's at  
 6 {CEL00009590/4}, please, and the introduction, if you  
 7 look at the bottom of the fourth page, it says:  
 8 "Buildings with a storey height greater than 18m  
 9 have additional requirements under the national building  
 10 regulations.  
 11 "Please refer to our separate compliance guide or  
 12 contact the Celotex Technical Centre for assistance."  
 13 Did you draft that?  
 14 A. Yes, I did.  
 15 Q. Yes, and that refers to the compliance guide.  
 16 A. Yes.  
 17 Q. Then if you go to {CEL00009579}, this is an email of  
 18 3 June 2014 where you emailed Mr Roper and Mr Warren  
 19 with some draft wording for an introduction. Do you see  
 20 that? There is, underneath it in italics, a block of  
 21 text. Can you see that?  
 22 A. Yes, I do.  
 23 Q. Just cast your eye down that. I'm not going to spend  
 24 time reading it all to you.  
 25 If you go back to the specification guide, perhaps

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1 we can keep that on the screen and look at the  
 2 specification guide at {CEL00000013/3}, this confirms  
 3 your evidence, I think, that the first three paragraphs  
 4 and the first two sentences of the fourth paragraph of  
 5 the introduction are the same.  
 6 Just casting your eye back and forth, you can see  
 7 that you were the one, I think, who had put that into  
 8 your 3 June email and it found its way into the  
 9 introduction.  
 10 A. Okay, yes.  
 11 Q. Yes?  
 12 A. Yeah.  
 13 Q. Now, you can see that, on the right-hand side of the  
 14 page -- well, you can see on the left-hand side of the  
 15 page that your email stops where it says:  
 16 "Celotex RS5000 is uniquely positioned to help meet  
 17 these goals. Celotex RS5000 is a premium PIR  
 18 solution ..."  
 19 Then it stops at that point, dot dot dot, but if you  
 20 cast your eye to the right-hand side, someone has added  
 21 the words "for use in rainscreen applications and  
 22 suitable for use in building above 18 metres in height".  
 23 Do you know who put that wording in to the final  
 24 version of the specification guide in that paragraph,  
 25 because it doesn't appear in your email?

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1 A. No, I don't.  
 2 Q. Did you know where it came from? Do you know, or did  
 3 you know at the time where it came from?  
 4 A. I know it's consistent with how Celotex wanted to market  
 5 the product. I didn't know where those words had come  
 6 from. I think I know now, from other people's evidence,  
 7 that they were taken from a Kingspan document.  
 8 Q. Right.  
 9 At the time, did you see the specification guide,  
 10 and particularly those words there which follow on  
 11 immediately from the words that you had drafted?  
 12 A. Yes, I would have seen this document after it had been  
 13 produced.  
 14 Q. Did you think at the time that those words were -- well,  
 15 let me put it to you that those words are, on the page,  
 16 thoroughly misleading, aren't they? Because they  
 17 suggest that RS5000 can be used in any building above  
 18 18 metres, regardless of whether the construction of the  
 19 cladding system on such buildings is the same as that  
 20 which had passed the test.  
 21 A. Yes, I would agree with that.  
 22 Q. Did the fact that those were thoroughly misleading words  
 23 occur to you at the time?  
 24 A. Yes, I think it would have done.  
 25 Q. Yes. So can we again cut a long story short by saying

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1 that, at least in this respect, you knew that Celotex  
 2 was marketing RS5000 on the basis of a thoroughly  
 3 misleading statement about its potential for use in  
 4 buildings over 18 metres?  
 5 A. Yes.  
 6 Q. Yes.  
 7 I think you said you had had nothing to do with the  
 8 compliance guide; is that right?  
 9 A. That's correct.  
 10 Q. Drafting of the compliance guide.  
 11 Now, the launch presentation happened in early  
 12 August 2014. Can we go to {CEL00001228}, please. This  
 13 is an email to you and Rob Warren from Jonathan Roper on  
 14 that day, which attaches a draft of the CTC presentation  
 15 for 4 August, with some slides and some FAQs at the end.  
 16 Do you remember receiving this document?  
 17 A. I'm not sure if I remember receiving it -- if I remember  
 18 receiving it at the time, but I have -- I've seen this  
 19 document and also the coming presentation.  
 20 Q. Did you understand the purpose of this document to be to  
 21 make sure that you and your fellow TSOs, who would  
 22 handle technical queries as they might come in in  
 23 relation to RS5000, would know all about it and be able  
 24 to answer questions about it in advance of or perhaps  
 25 shortly after the launch?

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1 A. Yes, I do.  
 2 Q. Did that presentation go ahead, do you know?  
 3 A. Yes, it did.  
 4 Q. Were you there?  
 5 A. Yes, I was.  
 6 Q. Do you know who delivered it?  
 7 A. It was delivered primarily by Jon Roper --  
 8 Q. Right.  
 9 A. -- but there was -- but Rob Warren delivered a section  
 10 at the end.  
 11 Q. Can we look at {CEL00001229}, please. This is the CTC  
 12 launch presentation of 4 August 2014, as you can see.  
 13 Is that the same set of slides as you saw?  
 14 A. I'm not sure, because I know from looking at other  
 15 evidence that there was also a similar document for the  
 16 sales launch, and I think that they are different in  
 17 some respects. So I think if that date is correct,  
 18 04/08/14, to the email we just saw, where it -- well,  
 19 I'm not sure whether it did say that, did it?  
 20 Q. I'm just wondering whether this is the same set of  
 21 documents that you saw or whether there was  
 22 a difference.  
 23 Let's see how we go. Can we go to slide 18  
 24 {CEL00001229/18}.  
 25 A. Okay.

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1 Q. Here is a list of products, five of them in all, which  
 2 are described as the "Latest Addition To Our  
 3 '5000' Range".  
 4 A. Yeah.  
 5 Q. Was that in the slide pack that you had seen?  
 6 A. I believe so, yes.  
 7 Q. Right.  
 8 Now, it describes RS5000 as the latest addition to  
 9 our 5000 range. In fact, as I think you told us  
 10 earlier, it wasn't; it was essentially FR5000  
 11 re-branded, wasn't it?  
 12 A. That's correct.  
 13 Q. So, on the face of this slide, this was a false and  
 14 misleading statement to your own sales team, wasn't it,  
 15 to the extent that it described Celotex RS5000 as  
 16 a latest addition? It was already in the range.  
 17 A. Yes, in that sense, that's correct, yeah.  
 18 Q. Was that fact well understood within the CTC, namely the  
 19 fact that, actually, Celotex RS5000 was not remotely  
 20 a latest addition; it was simply Celotex FR5000 got up  
 21 with a new number?  
 22 A. I think it was a -- I think that people came later to  
 23 understand that. I think it was a kind of an open  
 24 secret, because our understanding was that, although we  
 25 knew that to be the case and it was discussed amongst

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1 the technical team and the people within the technical  
 2 team knew that it was the same product physically, it  
 3 was an instruction that that was not to be revealed to  
 4 customers.  
 5 Q. Now, Jonathan Roome in the sales team told us -- and  
 6 this is the gist of his evidence -- that he wasn't aware  
 7 that RS5000 wasn't a new product.  
 8 Was there a plan within Celotex to conceal that fact  
 9 from the sales team?  
 10 A. I don't know.  
 11 Q. Well, you can help us, I think. Do you know of whether  
 12 or not there was a plan within Celotex to conceal the  
 13 fact that RS5000 was in fact FR5000 re-branded from the  
 14 sales team?  
 15 A. I'm not sure to what extent they did understand that.  
 16 It's obviously presented here on this slide as being  
 17 a new product. My recollection is it was a kind of  
 18 an open secret and that most people at Celotex knew that  
 19 they were the same product.  
 20 Q. Why would you have an open secret? What was the purpose  
 21 of that?  
 22 A. I think it was to be not revealed to customers, and --  
 23 Q. Right.  
 24 A. -- an example of that would be: let's say that  
 25 somebody's ordered by accident FR5000, and they've got

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1 it on their building site waiting to go on to their  
 2 building -- I mean, put aside the fact of whether it was  
 3 or wasn't suitable to be done so -- and they rang up and  
 4 said, "Oh, we've ordered the wrong thing, we've got  
 5 FR5000 instead of RS5000", I believe that they would  
 6 have been told, "No, you have got the wrong thing, you  
 7 will need to send it back and get the right thing", even  
 8 though, in reality, it's the same product.  
 9 Q. That is an odd idea, I have to confess. Why not just  
 10 get the sales team or your people to say, "Don't worry,  
 11 FR5000 has now passed an 8414 test and you can use it",  
 12 subject of course to the numerous caveats that we see in  
 13 the marketing literature and other things?  
 14 A. They obviously did not want that to be the case.  
 15 Q. I have to suggest to you that was because they wanted to  
 16 drive sales of RS5000 as if it were a new product when  
 17 it wasn't.  
 18 A. That may -- yeah, I would say that is correct.  
 19 Q. I'm putting that to you. Is that the case? Is that the  
 20 fact?  
 21 A. I believe so, yes.  
 22 Q. Right.  
 23 Slide 39 {CEL00001229/39}, then, please, "Compliance  
 24 Guide". It says in the third bullet point there:  
 25 "Reference Point For Above 18 Metre Enquiries &

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1 Should Be Attached To Every U-value Calculator/Email  
 2 Sent."  
 3 At the top of that it says:  
 4 •" Guide To Complying With AD B2 For Buildings Above  
 5 18 Metres In Height  
 6 •" Details The Tested System."  
 7 When it says "Details The Tested System", that was  
 8 actually untrue, wasn't it?  
 9 A. That's correct.  
 10 Q. When it says "Reference Point For Above 18 Metre  
 11 Enquiries", that was encouraging sales colleagues, or  
 12 perhaps CTC colleagues, to rely on a slide that all of  
 13 you knew, you, Jon Roper and Paul Evans -- is this  
 14 right? -- to be misleading?  
 15 A. That is correct.  
 16 Q. And it's misleading because it didn't detail the system  
 17 as tested.  
 18 A. That's correct.  
 19 Q. Similarly, slide 40 {CEL00001229/40}:  
 20 "Q. Do You Have A Solution For Buildings Above  
 21 18 Metres In Height?  
 22 "[Answer:] Yes, Celotex RS5000 has successfully met  
 23 the performance criteria in BR 135 & therefore is  
 24 acceptable for use in buildings above 18 metres in  
 25 height."

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1 Again, that was a thoroughly misleading and  
 2 dishonest statement because everybody at Celotex knew  
 3 that the fact that it had passed that test didn't make  
 4 it acceptable for use in all buildings over that height.  
 5 A. Yes, I would agree.  
 6 Q. We see your comments coming back on these at  
 7 {CEL00010362}, and you say:  
 8 "Hi Jon,  
 9 "Looks brilliant."  
 10 And you give comments on lots of slides here.  
 11 Now, allowing for any differences in the slides that  
 12 we've shown you, you don't raise the concerns relating  
 13 to slide 18, slide 39 and slide 40 that I've shown you.  
 14 You don't say, "Those are misleading, you can't possibly  
 15 put those out".  
 16 A. No, I don't.  
 17 Q. Why is that?  
 18 A. Because a decision had already been made and  
 19 communicated to me that this is the way that Celotex is  
 20 intending to market that material, and, as I said  
 21 previously, all of the work that happens after that is  
 22 on that basis, and so I'm proceeding on the basis that  
 23 that decision has been made, and limiting my feedback to  
 24 other areas.  
 25 Q. Now, you see in the middle of that email, under

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1 "Slide 23", you ask a question:  
 2 "Are we going to push RS5000 for masonry outer leaf  
 3 as well? What is our position on masonry outer leaf and  
 4 18m?"  
 5 Is the reality that you knew that the only position  
 6 that you could hold, or that CTC people taking calls  
 7 could hold, was that masonry outer leaf was outside the  
 8 scope of the system as tested because the system had  
 9 been tested under part 2 and not part 1 of BS 8414?  
 10 A. That is correct. I think there was a feeling that, due  
 11 to the nature of masonry, as in that it's not really  
 12 a rainscreen cladding, it could not be anything other  
 13 than robust, because to break into the cavity, fire  
 14 would have to go through bricks, which it would never  
 15 do.  
 16 Now, I would agree with you now that, looking back  
 17 on that, that is an erroneous thought, because it's  
 18 not -- it wasn't for us to actually form that opinion,  
 19 but nevertheless that was the basis for that comment.  
 20 Q. Can I just ask you one or two questions about the actual  
 21 marketing of RS5000 from your perspective.  
 22 Can we go to your statement, please, at page 26  
 23 {CEL00010054/26} and look at paragraph 81.  
 24 You say there, in the fourth line down:  
 25 "We then started taking customer enquiries on RS5000

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1 after launch in autumn 2014. Potential customers  
 2 contacted the Technical Team to ask if they could use  
 3 our product in above 18 metre projects and I would say,  
 4 potentially they could, but that they should consider  
 5 their decision in conjunction with a document which  
 6 detailed the Test, this being the Celotex compliance  
 7 guide."  
 8 Then you go on in the next paragraph, 82, to say:  
 9 "We were strict with customers and were careful to  
 10 say to those enquiring about buildings above 18 metres  
 11 that they could not use our product, unless they were  
 12 using it in accordance with the compliance guide."  
 13 At paragraph 83 you go on to say, in the second  
 14 line:  
 15 "... I was thorough in informing customers that  
 16 RS5000 should be used in accordance with this design.  
 17 I tried to do the best that I could as far as I could."  
 18 Now, the problem is, isn't it, that the compliance  
 19 guide didn't in fact show the design which was actually  
 20 tested, did it, because it concealed the presence of the  
 21 additional material?  
 22 A. That's correct.  
 23 Q. Ditto, nor did the BS 8414 report.  
 24 A. That's correct.  
 25 Q. Therefore, when you say you were strict with customers

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1 and referred them to the compliance guide, you were  
 2 referring customers to a compliance guide that you knew  
 3 was dishonest and misleading.  
 4 A. That's correct.  
 5 Q. So, in reality, you were a part, weren't you, of  
 6 continuing to perpetrate the fraud on the market?  
 7 A. Yes, that is correct. Although to -- no, that's fine.  
 8 Q. Well, no, do you want to add anything?  
 9 A. Yes. So, first of all, the way of dealing with customer  
 10 enquiries was an explicit work instruction from Celotex  
 11 senior management to our department. I did not make  
 12 a decision or have any part in a decision or authority  
 13 to make a decision to conceal the additional material.  
 14 I had a belief in my heart that if somebody were to  
 15 follow the guidance in the compliance guide, even though  
 16 it was misleading, that it would be based upon a design  
 17 that would pass -- would have passed if it was tested  
 18 that way.  
 19 I didn't have any control over how Celotex had  
 20 chosen to go down that route, although I absolutely  
 21 accept that I knew about it and didn't do what was right  
 22 in raising it. And what was under my control was -- and  
 23 you may feel this is entirely insufficient, but it was  
 24 to at least diligently ensure that people did receive  
 25 the compliance guide.

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1 But that having been said, and with that context,  
 2 I completely agree with your question that I was indeed  
 3 referring people to a document which was fundamentally  
 4 incorrect.  
 5 Q. You say in that last answer that you had a belief in  
 6 your heart that if somebody were to follow the guidance,  
 7 it would be based on a design that would pass; I have to  
 8 suggest to you, Mr Hayes, that you had no basis at all  
 9 in thinking that the design as described in the  
 10 compliance guide and the specification guide would have  
 11 passed, namely without the additional material?  
 12 A. I think there is some basis for that, and I'm not trying  
 13 to retroactively make excuses for behaviour which wasn't  
 14 correct, but I think it is fair to say that there was  
 15 a basis for that, and the basis of that was the  
 16 conversation with Phil Clark, and again I don't want to  
 17 come across as trying to excuse behaviour which wasn't  
 18 correct, but I think it's fair and relevant to raise the  
 19 fact that that design was tested after Grenfell and  
 20 in fact did pass.  
 21 Q. But that wasn't known to you at the time.  
 22 A. No. I accept that completely.  
 23 Q. And the conversation you refer to with Phil Clark was  
 24 really pure speculation as between the two of you,  
 25 because there had been no such test.

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1 A. Yes, I also accept that, but I think that Phil would  
 2 have had a level of experience and expertise so that his  
 3 opinion, if you like, and it was only an opinion, but it  
 4 would have carried some weight with me.  
 5 Q. I just want to look at one example of you giving advice.  
 6 Can we look at {CEL00001397}, please. This is  
 7 an email chain in early March 2013, Mr Hayes, between  
 8 Simco and "Celotex, Technical" in relation to a  
 9 Bowmer + Kirkland project at ONB, which I think stands  
 10 for One New Bailey. Do you remember that?  
 11 A. Erm ...  
 12 Q. We can look at it.  
 13 If we go to {CEL00001397/2} and over to page 3, we  
 14 can see that Mr Ross, Eric Ross of Simco, sends an email  
 15 to "Celotex, Technical" about U-values, saying that  
 16 they've quoted for RS insulation on the above project,  
 17 One New Bailey, Salford, ONB.  
 18 If you go to page 3 {CEL00001397/3}, he goes on:  
 19 "The Main Contractor/Client had some concerns  
 20 regarding BBA certification, which you answered in the  
 21 attached e-mail, however they have since come back  
 22 again with the below comments."  
 23 The comments are set out below. That refers back to  
 24 you.  
 25 Would this email chain have come through to anyone

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1 in the technical team other than you, or would it have  
 2 come to you specifically, do you think?  
 3 A. I'm really not sure. Does it say? Does it not say on  
 4 the ...?  
 5 Q. No, it doesn't. If we go back to page 2  
 6 {CEL00001397/2}, we can see that it comes to the  
 7 technical team. Bottom of page 2, Eric Ross to  
 8 "Celotex, Technical".  
 9 We can see that you answer him at the next email up  
 10 at page 2. You say:  
 11 "Thank you for your e-mail."  
 12 4 March. Do you see that?  
 13 A. Yes, can I --  
 14 Q. It's from "Celotex, Technical", but it goes out in your  
 15 name.  
 16 A. Sure.  
 17 Q. Would it have come to you directly or would it have come  
 18 through someone else to you?  
 19 A. It would have come, by the looks of it, to the technical  
 20 address, which is an open inbox, which is --  
 21 Q. I see.  
 22 A. -- available for the team to see.  
 23 Q. Right.  
 24 I think we can see the response to this, or an email  
 25 chain relating to it, {CEL00001397/5}, please, and over

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1 on to page 6, we can see that there had been an earlier  
 2 discussion relating to RS5000, and halfway down that  
 3 email you can see it says:  
 4 "Please find below & attached response from Celotex  
 5 regarding the BBA issue, I hope this is sufficient?"  
 6 Then it is set out:  
 7 "As stated in Approved Document B2 (ADB) ..."  
 8 Did you write that response, do you think?  
 9 (Pause)  
 10 A. No, I don't believe so. But, I mean, I'm now looking at  
 11 this document possibly for the first time, and I don't  
 12 have a memory of writing that.  
 13 Q. Right. If it wasn't you, who else might it have been in  
 14 your technical department?  
 15 A. Has it come from the technical department or has it come  
 16 from somebody else at Celotex, or ...?  
 17 Q. Let me see if I can do this two slightly different ways.  
 18 It's a very complex email string to run around.  
 19 A. I have to say, yes.  
 20 Q. But if we go to page 2 {CEL00001397/2} we can see that  
 21 you send an email to Eric Ross, as I showed you before,  
 22 on 4 March 2015, and you say:  
 23 "Thank you for your email."  
 24 "I [am] happy that the statement we made previously  
 25 is suitable and correct. Celotex RS5000 has been

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1 successfully tested to BS8414 part 2 and so can be  
 2 considered for use in buildings above 18m."  
 3 I can probably take the question just on that. That  
 4 wasn't correct, was it?  
 5 A. No.  
 6 Q. In fact, it was false and misleading to say that it  
 7 could be considered for use on buildings above 18 metres  
 8 merely by reason of the fact that it had passed that  
 9 test.  
 10 A. I would agree with you.  
 11 Q. Yes.  
 12 A. Yes, although it is the Celotex-determined response to  
 13 queries regarding RS5000.  
 14 Q. Right. So that was the party line, as it were, that you  
 15 were pumping out?  
 16 A. That's -- yes.  
 17 Q. Yes.  
 18 Just to finish off the point, then, if we could go  
 19 back to the email on --  
 20 SIR MARTIN MOORE-BICK: Would you just like to comment on  
 21 the next paragraph?  
 22 A. Again, that is -- our position is that we are open about  
 23 the system, so again, that is part of the Celotex  
 24 position, which is that enquiries will be dealt with by  
 25 providing the U-value calculation for --

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1 MR MILLETT: But that was false, though, wasn't it? Your  
 2 position was that you were very far from open about the  
 3 system that you had tested, because the system that you  
 4 had tested included the additional material about which  
 5 you were very far from open.  
 6 A. I would agree with that, yes.  
 7 Q. So, again, that's a false and misleading statement that  
 8 you, yourself, were giving Eric Ross; yes?  
 9 A. Yes.  
 10 Q. If we then go to page 5 {CEL00001397/5}, there is  
 11 a longer version of the response which I think you were  
 12 picking up in this email, halfway down the email that  
 13 Eric Ross sends to Simon Martin, under the words  
 14 I showed you, and there we can see three paragraphs on  
 15 that page ending with the words:  
 16 "... and therefore complies with the requirements of  
 17 ADB for buildings that exceed 18 metres in height."  
 18 Again, I think you agree, false and misleading; yes?  
 19 A. Yes.  
 20 Q. Yes.  
 21 Then on the next page, page 6 {CEL00001397/6}, you  
 22 say:  
 23 "Celotex RS5000 has also achieved Local Authority  
 24 Building Control (LABC) approval for use in rainscreen  
 25 cladding systems. Please find this attached confirming

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1 that the product is suitable for use in masonry and  
 2 steel frame constructions, has achieved the performance  
 3 criteria set out in BR 135 and has a thermal  
 4 conductivity of 0.021 ..."  
 5 Did you send him the LABC certificate that was  
 6 issued by the LABC at the end of August, do you think?  
 7 A. I think I'm getting a little bit confused because wasn't  
 8 the question: had I written that? And that doesn't  
 9 seem --  
 10 Q. Right. It certainly seems to have come from Celotex and  
 11 the technical department; is that wrong?  
 12 A. It may well be wrong, yes, perhaps that has come from  
 13 a different place within Celotex, and in fact some of  
 14 those words look familiar because I think there is  
 15 something in evidence where perhaps Jon Roper has  
 16 produced a -- isn't there in his evidence an email where  
 17 he gives a standard set of words to be used in dealing  
 18 with enquiries? And that seems similar to this.  
 19 Q. Right.  
 20 A. So perhaps it's come from a salesperson, for example.  
 21 So if the question is: do I remember writing that  
 22 set of words? Then the answer is: no, I don't. But if  
 23 he says that has come from Celotex, then there must be  
 24 another email which Celotex can provide from their  
 25 servers which would tell you exactly who indeed has said

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1 that and where it's come from.  
 2 Q. Right. The only reason I ask is if we go back to the  
 3 second page of this email run {CEL00001397/2}, as  
 4 I showed you, the first paragraph says that you said:  
 5 "I [am] happy that the statement we made previously  
 6 is suitable and correct."  
 7 A. Yes.  
 8 Q. Without getting hung up on whether it was you personally  
 9 or Mr Roper or another department, you are certainly  
 10 standing by the statement as we see set out at length.  
 11 A. Okay.  
 12 Q. Do you accept that?  
 13 A. Yes, I do.  
 14 Q. Therefore, you were repeating the false and misleading  
 15 statements contained earlier on.  
 16 A. Yes.  
 17 Q. You referred in that last paragraph, as I showed you on  
 18 page 6, to the LABC certificate. Was that a reference  
 19 to the LABC certificate that had been issued at the end  
 20 of August 2014?  
 21 A. Yes, and I think, to be fair, there's every possibility  
 22 that somebody has come in with this enquiry, and I have  
 23 been in a position where I've had to affirm the Celotex  
 24 line, if you like, which is to say, "Yes, you can  
 25 consider the product, here's a copy of the compliance

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1 guide", but without a specific memory of it, I'm not  
 2 able to say that I looked at every one of those  
 3 paragraphs and said, "Okay, yeah, yeah, yeah, I'm  
 4 affirming that". It may well have been that I had no  
 5 choice but to say, "Yes, we stand by it", because for me  
 6 to take any action would be to say, "No, that's not  
 7 correct", which was not the position of Celotex to say  
 8 that.  
 9 Q. Can I then turn to January 2015 and Grenfell itself.  
 10 {CEL00000453}, please. Now, this is an email, if we go  
 11 halfway down that page, from Jonathan Roome to you on  
 12 19 January 2015. If you go over the page  
 13 {CEL00000453/2}, you can see that it forwards to you  
 14 an email that Jonathan Roome has received from  
 15 Daniel Anketell-Jones at Harley.  
 16 Now, you may not have known this at the time, but  
 17 Daniel Anketell-Jones was the designer on the  
 18 Grenfell Tower project. This email isn't about the  
 19 Grenfell Tower project, at least not on its face. It  
 20 says:  
 21 "Good Morning Jon,  
 22 "Sorry - but got a headache for you!  
 23 "We are being asked by one of our clients to see the  
 24 test results and certificates for the RS5000 insulation.  
 25 "They want to know exactly how it was installed when

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1 tested to BS 8414-2:2005, who carried out the testing ,  
 2 how it was fixed , what it was covered with, what  
 3 cladding was used, what support structure, etc and most  
 4 importantly the results . Drawings and or photos of the  
 5 test set up would help show how it was installed , but  
 6 I imagine these form part of the test results anyway.

7 "They also want to see the certificate and results  
 8 for the test to BS476 Pt7 (fire class rating ), showing  
 9 the index rating achieved during the test .

10 "Could you sort this out for us please? We are  
 11 hoping to put this forward on most of the cladding jobs,  
 12 so having this information to hand would be most  
 13 useful ."

14 That comes to you from Jonathan Roome. He says, if  
 15 you go to the bottom of page 1 {CEL00000453/1}:

16 "Hi Jamie,

17 "Do we have test results for RS5000 for the  
 18 BS476 Pt7 (fire class rating) as Dan mentions below.

19 "I can always go and visit Dan to discuss the  
 20 SS8414:2 test results in person."

21 Then you respond to him and say:

22 "Hi Jonathan,

23 "I am afraid I do not have access to that document.

24 "I imagine that this will be a controlled document  
 25 and only available through marketing. I am not sure if

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1 there would be a requirement for a non-disclosure  
 2 agreement etc?

3 "Please speak to Debs in the first instance and if  
 4 necessary she will have a chat with Paul."

5 Now, first of all , when you saw the email from  
 6 Daniel Anketell-Jones that Jonathan Roome emailed to  
 7 you, and he says, "I've got a headache for you", was  
 8 that the kind of request for details that you were  
 9 beginning to receive or had been receiving since the  
 10 launch of RS5000 in August?

11 A. That seems to be very detailed in terms of how he's laid  
 12 things out and the things that he's asked for, but we  
 13 were receiving enquiries, I can't think of any ones  
 14 in -- specifically , but I think that we would have  
 15 received enquiries about the use of the product above  
 16 18 metres, and it's possible that some of those  
 17 enquiries would have asked for things such as test data.

18 Q. Right.

19 Now, you say that you didn't have access to that  
 20 document. Why didn't you have access to the full  
 21 33-page BRE test report?

22 A. I don't think that Jonathan Roome is asking me for that  
 23 document. I think he's asking me for the BS 476-7  
 24 document.

25 Q. Right.

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1 A. And that document is to do with the surface spread of  
 2 flame testing and not to do with the above-18-metre  
 3 test .

4 Q. I see. So you did have access to the BS 8414 full test  
 5 report, but you are saying not the BS 476-7 test; is  
 6 that right?

7 A. The Celotex technical centre did not have access to  
 8 either of those test reports. I believe that  
 9 I personally had a copy of the 32-page test report  
 10 because Debbie had sent it to me on a previous occasion,  
 11 but the team or the department would not have access to  
 12 either of those documents, and in respect to his  
 13 specific request, which is 476-7, I did not have and  
 14 would not be expected to have access to that document.

15 Q. Right.

16 Mr Roome told us that his experience was members of  
 17 the sales team didn't have access to test reports. Did  
 18 that apply to you as a member of the technical team?

19 A. Yes, that's correct.

20 Q. Given your role in the test and in seeing the draft test  
 21 reports for RS5000, that wasn't correct, was it? You  
 22 did at least have access to those documents?

23 A. I personally had a copy of the 32-page test report for  
 24 the 8414 test. That was because of, I guess, my being  
 25 on the project and my relationship with Debbie. The

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1 department as an entity were not to have a copy of that  
 2 test report, and the department and me personally would  
 3 not have had any other test reports relevant to Celotex  
 4 products.

5 I'm sorry if that's not clear. I've tried to be  
 6 clear .

7 Q. Did you know of a general requirement, if that's the  
 8 right word, in Approved Document B in at least two  
 9 places that designers, when considering external wall  
 10 constructions, should carefully check the test reports  
 11 to ensure the compliance of products with the test  
 12 results? I'm paraphrasing Approved Document B, perhaps  
 13 unsurprisingly.

14 A. No --

15 Q. Were you aware of that?

16 A. Yes, I was.

17 Q. How did you think designers would be able to go about  
 18 complying with that guidance if Celotex, in relation to  
 19 a Celotex product, were simply going to refuse access to  
 20 those test reports on the grounds that they were  
 21 controlled?

22 A. I don't think that they would be able to.

23 Q. Did it occur to you at the time that by pursuing  
 24 a policy of not allowing designers to see test reports  
 25 and check the data in it, you were disabling them from

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1 complying with the requirements under ADB?

2 A. I don't think I thought about it in those terms, but

3 I did realise that it was ridiculous, really, that they

4 would not have that access to that document.

5 Q. Right. Did you take that view up with anybody within

6 Celotex and try to encourage people to be a little bit

7 more open so that designers could actually test these

8 products?

9 A. I think it comes down to exactly the issue with the

10 missing material. They had a -- I think a -- well,

11 first of all, there was a deliberate misleading in terms

12 of the tested system, but I also believe that they did

13 not want to encourage people to ask questions about the

14 specific details of the test.

15 MR MILLETT: Right.

16 Well, Mr Hayes, thank you very much for your

17 evidence generally. I have come to the end of my

18 questions.

19 Mr Chairman, is this a convenient moment?

20 SIR MARTIN MOORE-BICK: Yes, I think it is.

21 MR MILLETT: I'm sorry it's taken a little bit longer.

22 SIR MARTIN MOORE-BICK: No, that's all right.

23 Mr Hayes, although counsel says he has come to the

24 end of his questions, we always have a break at this

25 point, first of all to let him just check that there's

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1 nothing he hasn't covered, but also so that we can

2 consider questions from others who are not here but who

3 are following the proceedings.

4 So we will have a ten-minute break, is that enough?

5 MR MILLETT: Yes, Mr Chairman, I think that would suffice.

6 SIR MARTIN MOORE-BICK: Well, we'll say ten minutes unless

7 you tell us you need more later on.

8 MR MILLETT: Very good, thank you very much.

9 SIR MARTIN MOORE-BICK: We will stop for ten minutes, I hope

10 it won't be any longer, and then you'll come back and

11 we'll see if there are further questions.

12 THE WITNESS: Thank you.

13 SIR MARTIN MOORE-BICK: So 4.40, and no talking to anyone

14 about your evidence while you're out.

15 THE WITNESS: Yes, sir.

16 SIR MARTIN MOORE-BICK: All right? Thank you very much.

17 (Pause)

18 Mr Millett, if it turns out that more time is

19 required, you can let us know.

20 MR MILLETT: Yes, thank you.

21 SIR MARTIN MOORE-BICK: 4.40 otherwise. Thank you.

22 (4.30 pm)

23 (A short break)

24 (4.45 pm)

25 SIR MARTIN MOORE-BICK: All right, Mr Hayes, we will see if

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1 Mr Millett has found some more questions for you.

2 Yes, Mr Millett.

3 MR MILLETT: Mr Hayes, I just want to ask you one or two

4 questions about Mr Warren's involvement.

5 Did you discuss the presence of the magnesium oxide

6 and the other additional material with him before the

7 test, the second test?

8 A. Yes.

9 Q. Did Mr Warren know exactly what was going into the

10 second test, to the best of your recollection?

11 A. I think I said earlier and in my first statement that

12 I discussed it as an idea with Rob, and that I had

13 a specific recollection of talking about it as an idea

14 with Rob. I don't recall a specific conversation with

15 Rob after the test about its presence. So ... so that's

16 the answer.

17 Q. Right.

18 Following up on that, from what you know from what

19 you saw or heard from other people, or heard

20 particularly from Mr Warren, did you know or think that

21 Mr Warren had known about the decision following the

22 second test to conceal the use or presence of the

23 additional materials?

24 A. It's not an easy question to answer. I think it's fair

25 to tell the Inquiry that I have a relationship with Rob,

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1 worked with Rob for many years, worked with him after

2 Celotex, stayed in touch with him. Rob is a person that

3 I like and have respect for.

4 At the time of my first statement, I wasn't sure

5 whether Rob was aware of that material. I think,

6 looking back at it, the fact that Rob -- I'd had

7 a discussion with Rob about the idea to use it, and just

8 things that I've now seen to show that it was being

9 discussed at senior management level -- the answer is

10 I'm not sure. The balance of probability is that he --

11 well, that's it.

12 Q. Right, okay.

13 Can I just ask you one or two other questions about

14 the RS5000 test datasheet, {CEL00000411}, please. You

15 can see on this page -- I know you had no input into

16 this document, as you I think told us, but presumably

17 you saw this --

18 A. Yes.

19 Q. -- in and after August 2014 because of your role in the

20 technical services department.

21 You can see that it says it's been tested to

22 class 0. Do you know when those class 0 tests were, the

23 tests to BS 476-6 and 7? Do you know when those were?

24 A. No, I don't, and testing to class 0 would not have been

25 something that I had ever been involved with.

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1 Q. Did you know that the statement in fact was relying on  
 2 tests under those British Standards which had been done  
 3 in 2011?  
 4 A. I think that I have been made aware of that after the  
 5 fact, that I have become aware of that. I don't believe  
 6 that --  
 7 Q. Did you know at the time that there had been a change in  
 8 the chemical make-up of FR5000 in and from August 2012  
 9 on the Hipchen line where the polyol used was different?  
 10 Did you know about that?  
 11 A. No, I had no knowledge of that at all. That is  
 12 something I have since become aware of from viewing  
 13 evidence which was made available to me as  
 14 a core participant.  
 15 Q. So would it follow that you didn't know that there was  
 16 no further testing under BS 476-6 or 476-7 on the new  
 17 composition of the then FR, later RS5000, after the  
 18 addition of the polyol on the Hipchen line?  
 19 A. No, I did not know that at all.  
 20 MR MILLETT: Okay, thank you very much.  
 21 Mr Chairman, I don't think I have any further  
 22 questions.  
 23 SIR MARTIN MOORE-BICK: Right.  
 24 MR MILLETT: So, Mr Hayes, it remains for me to thank you  
 25 very much for coming to the Inquiry and answering my

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1 questions. I am extremely grateful to you, so  
 2 thank you.  
 3 SIR MARTIN MOORE-BICK: Mr Hayes, it's right that I should  
 4 thank you on behalf of the panel for coming here to give  
 5 us your evidence. It has been extremely useful to hear  
 6 from you, and we're very grateful to you for coming and  
 7 telling us all you know about these matters, so thank  
 8 you very much.  
 9 THE WITNESS: Thank you very much indeed.  
 10 SIR MARTIN MOORE-BICK: And now you're free to go.  
 11 THE WITNESS: Thank you.  
 12 SIR MARTIN MOORE-BICK: Thank you.  
 13 (The witness withdrew)  
 14 SIR MARTIN MOORE-BICK: Well, Mr Millett, that must be the  
 15 end for today.  
 16 MR MILLETT: It is the end for today, I'm glad to say, and  
 17 at 4.50, it jolly well should be, I suppose.  
 18 SIR MARTIN MOORE-BICK: I am glad we were able to finish  
 19 Mr Hayes' evidence.  
 20 MR MILLETT: Yes.  
 21 Now, we had got Debbie Berger scheduled to come  
 22 today to give evidence. As I said yesterday, and  
 23 self-evidently, she won't be coming for today. We are  
 24 still organising her for the end of next week, and for  
 25 the moment, provisionally, she is to come to give

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1 evidence next Thursday morning.  
 2 SIR MARTIN MOORE-BICK: Right, thank you.  
 3 MR MILLETT: We will update core participants to finalise  
 4 that as soon as we can.  
 5 SIR MARTIN MOORE-BICK: Thank you very much.  
 6 Well, that's as far as we can go for today. We now  
 7 break off until Monday of next week at 10 o'clock, when  
 8 we'll begin to take evidence from another witness.  
 9 Good. So 10 o'clock on Monday, please. Thank you  
 10 very much.  
 11 MR MILLETT: Thank you.  
 12 (4.51 pm)  
 13 (The hearing adjourned until 10 am  
 14 on Monday, 23 November 2020)  
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