

OPUS 2

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Grenfell Tower Inquiry

Day 83

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1 Monday, 7 December 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 from Kingspan.
6 MR MILLETT: Yes, Mr Chairman. Good morning, Mr Chairman,
7 good morning, members of the panel.
8 Yes, I now call Adrian Pargeter, please.
9 MR ADRIAN WESTLEY PARGETER (affirmed)
10 SIR MARTIN MOORE-BICK: Thank you very much, Mr Pargeter.
11 Would you like to sit down and make yourself
12 comfortable.
13 Yes, Mr Millett.
14 Questions from COUNSEL TO THE INQUIRY
15 MR MILLETT: Mr Chairman, thank you.
16 Mr Pargeter, good morning.
17 Can I start by thanking you very much for coming to
18 the Inquiry and assisting us with our investigations.
19 We very much appreciate it.
20 If you have any difficulty understanding my
21 questions, or you want me to rephrase the question or
22 ask it in a different way, I'm very happy to do that.
23 We are going to take scheduled breaks, as we do with
24 all witnesses, throughout the course of the day, but if
25 you feel you need a break at any other time, just let us

1

1 know and we can take a break.
2 I should just ask you also to keep your voice up
3 when answering questions, so that the person who sits to
4 your right, who is the transcriber, can get that down
5 accurately and clearly.
6 Also just a tip: if you can refrain from nodding or
7 shaking your head, but say "yes" or "no" as the case may
8 be, then that goes on to the transcript, whereas a head
9 movement doesn't.
10 A. Understood.
11 Q. Now, you have provided four witness statements, I think,
12 to the Inquiry to date. Can I take you to them.
13 They'll be in a folder on your desk in front of you
14 there, but they'll also appear on the screen, and I will
15 be going to the screen version with you, but by all
16 means do consult the paper version if you feel more
17 comfortable with that.
18 The first statement is 1 October 2018 at
19 {KIN00000494}.
20 Is that your first witness statement to the Inquiry?
21 A. Yes, it is.
22 Q. Can you please go to page 35. There is a signature
23 there. Is that your signature?
24 A. That's my signature, yes.
25 Q. Now, let's go to the second statement, that's dated

2

1 1 October 2019, just a year or so later, {KIN00020824},
2 please.
3 Is that your second witness statement?
4 A. It is.
5 Q. Can you please go to page 116. Is the signature there
6 your signature?
7 A. Yes.
8 Q. Let's look at your third witness statement, dated
9 18 September 2020, {KIN00022610}.
10 Is that your third witness statement?
11 A. It is.
12 Q. Can we go to page 68, please. There's a signature above
13 the date of 18 September 2020. Is that your signature?
14 A. Yes.
15 Q. Thank you.
16 Finally, your fourth witness statement of
17 3 November 2020, at {KIN00024385}, please.
18 Is that your fourth witness statement to
19 the Inquiry?
20 A. Yes.
21 Q. Thank you.
22 Could you please go to page 17. You will see
23 a signature there. Is that your signature?
24 A. It is.
25 Q. Have you read these witness statements recently?

3

1 A. I have.
2 Q. Do you say that the contents of these statements are
3 true.
4 A. I do.
5 Q. Have you discussed any of your statements or the
6 evidence that you're going to give today with anybody
7 before coming here today?
8 A. Only with my legal team.
9 Q. Right.
10 Now, before we begin, I just want to ask you
11 a general question about Kingspan in the sense of the
12 name.
13 In the first two statements that we've just looked
14 at, you refer to your employer as "Kingspan", and that's
15 how you define it, but in the third statement you refer
16 to your employer as "Insulation UK", and in the fourth
17 statement you refer to your employer as
18 "Kingspan Insulation".
19 Are they all the same company throughout with
20 different names that you've given them, or do they have
21 different names?
22 A. No, my witness statements are based on
23 Kingspan Insulation Limited, which sometimes gets
24 abbreviated to Kingspan, but to differentiate it from
25 the other parts of the group -- so I would normally

4

1 refer to it as Kingspan, but there are other parts of
 2 the group which I'm not speaking about, and it's
 3 Kingspan Insulation Limited.
 4 Q. Is there any reason why in the first two statements you
 5 referred to the company as "Kingspan", but in the third
 6 statement as "Insulation UK" and in the fourth statement
 7 as "Kingspan Insulation"? Why not stick to "Kingspan"
 8 throughout?
 9 A. I think it was just pointed out to me by our legal team
 10 to do a fuller explanation to differentiate it, to make
 11 that differentiation.
 12 Q. Right. But so that we're clear, this is the same
 13 company throughout?
 14 A. It is.
 15 Q. Okay.
 16 Now, in your first witness statement to the Inquiry
 17 you set out your education at paragraphs 2.1 to 2.3 on
 18 pages 3 and 4 {KIN0000494/3}, and we can see there, if
 19 we just have that up on the screen, a summary of that.
 20 I can take it, I think, quite quickly.
 21 It's right, I think, that you completed a Higher
 22 National Diploma in mechanical and production
 23 engineering at Birmingham Polytechnic in 1991; yes?
 24 A. That's correct.
 25 Q. Then you graduated with a Bachelor of Science,

5

1 BSc (Hons), first - class degree focusing on design and
 2 innovation from the Open University in 2002.
 3 A. Correct.
 4 Q. I think you have explained that that degree could be
 5 applied to any type of product design; is that correct?
 6 A. Yes, it was a general understanding of the process of
 7 designing a product.
 8 Q. Is it right that in 2013 you first obtained
 9 a professional diploma in management, and then
 10 a Master's degree in business administration and
 11 management from the Open University in 2016?
 12 A. That's correct.
 13 Q. Right.
 14 Now, when you were reading for your professional
 15 diploma in management, which you got in 2013, and then
 16 in 2016 for your -- is it right, an MBA?
 17 A. Yes, an MBA.
 18 Q. You were employed in senior positions by Kingspan?
 19 A. I was, yes.
 20 Q. Did you take time off to study or did you fit your
 21 studies in around your --
 22 A. I fitted my studies in around my role.
 23 Q. How did you balance the time that you were devoting to
 24 your studies in those years and the time given to your
 25 job at Kingspan?

6

1 A. With a lot of dedication in my own private time.
 2 Q. You don't think that the work you were doing, the
 3 studies you were doing, distracted you in any way?
 4 A. No, I think in some modules it helped. In fact,
 5 I switched a module around to do marketing because I was
 6 moved into a marketing role.
 7 Q. Just so we're clear, you weren't distracted from your
 8 work at work by your work on your academic studies?
 9 A. I tried not to be.
 10 Q. All right.
 11 Now, you have set out in your second witness
 12 statement the fact that you sat on a number of industry
 13 committees, and you have set them out.
 14 A. Yes.
 15 Q. We don't need to look at them unless you want to.
 16 Is it fair to say that you are an eminent and
 17 a respected voice in the insulation industry in this
 18 country?
 19 A. I wouldn't say that, no. I'm relatively new in a senior
 20 position and relatively new on those committees.
 21 Q. Right.
 22 A. And there are far more, you know, senior, more
 23 experienced people within those committees.
 24 Q. What was the purpose of your setting out in a long list
 25 your membership of those committees in that statement?

7

1 A. I think because it was part of the question that was
 2 asked, so I was trying to give as full an answer as
 3 I can.
 4 Q. It's right that you have published articles, I think,
 5 about the use of K15 in reputable construction industry
 6 publications, haven't you?
 7 A. Yes.
 8 Q. And there is one example we may need to come to later:
 9 Construction Manager, October 2015.
 10 A. Yes.
 11 Q. Just for the Inquiry's reference, that's {INQ00014126}.
 12 We don't need to go to it, at least at the moment.
 13 Can I then ask you about your first role at Kingspan
 14 in 2009.
 15 You started, I think, in a research and development
 16 role.
 17 A. That's correct.
 18 Q. Now, that was 11 years ago and, without giving too much
 19 away, how old were you at the time?
 20 A. 51 -- no, 41, sorry.
 21 Q. You did give it away.
 22 A. Yes.
 23 Q. That role, was it purely confined to developing another
 24 of Kingspan's products, Optim-R?
 25 A. Yes, it was focused on the product called Optim-R.

8

1 Q. You say it was focused on it; did you work at all with
 2 any other parts of the Kingspan range of products at
 3 that time?
 4 A. No.
 5 Q. So you were just focused on Optim-R?
 6 A. Yes.
 7 Q. Optim-R, as I understand it -- and tell me if this isn't
 8 right -- is a PIR insulation product, is it not?
 9 A. No, that's not correct. No, it's a vacuum insulation
 10 product.
 11 Q. Okay. But it's not for use, I think, above 18 metres,
 12 is it?
 13 A. No.
 14 Q. Did you deal with phenolic foam at all during that role?
 15 A. No.
 16 Q. Now, I think in late 2013, early 2014, as you tell us in
 17 your first statement, you were promoted to the role of
 18 product development manager.
 19 A. Yes, that's correct.
 20 Q. The reason I pick those months, and maybe you paused,
 21 was because you said just over four years after
 22 December 2009, and I just wondered exactly when it was
 23 that you were promoted to product development manager.
 24 A. Yes, I think it was the dates you just mentioned.
 25 Q. So let's go with late 2013, early 2014.

1 Can I just ask you whether the role to which you
 2 were promoted existed before you were promoted to it?
 3 A. No, I don't think it did.
 4 Q. Do you know why it was created?
 5 A. I think because there was a product development system
 6 in place called PPDS, product and process development
 7 system, and my boss at the time, Malcolm Rochefort, felt
 8 that that system needed updating, and he'd asked me if
 9 I would look at designing a new system, a more modern
 10 system, it was working on old technology, old software,
 11 and if I would like to take the offer of product
 12 development manager to develop that new process, project
 13 development --
 14 Q. I see. So this was not about specific products, but --
 15 A. No, about the process.
 16 Q. -- about the design system.
 17 You say a product and process development system.
 18 What was wrong with the system that you thought
 19 Mr Rochefort wanted to improve when he promoted you to
 20 that role?
 21 A. I think, one, it was working off old software, and it
 22 was always difficult to get the right people around the
 23 table at the right time. I think people thought that it
 24 was too full of projects as well, there were too many
 25 projects on it, and it made the process very slow. So

1 we wanted to have a more streamlined system working on
 2 more modern software.
 3 Q. Were there any specific products that were particular
 4 candidates for improvement in the sense of the
 5 application of this system to them?
 6 A. I think what we did do was a review of the products that
 7 were on the old system to see what we would move forward
 8 on to the new, and the -- one of them is the K15 low
 9 lambda development, as an example, that did move forward
 10 on to it, amongst others.
 11 Q. I see. So when you came into that role at this time --
 12 is this right? -- you revised or improved the old system
 13 for process and development in relation to K15, among
 14 other products?
 15 A. Among other products, yes.
 16 Q. What did you do by way of improvements to the old PPDS
 17 system you took over?
 18 A. Well, I mean, Tony Millichap and I were both looking at
 19 this together to begin with, and we were looking at --
 20 what I wanted to introduce was what we now call IDS,
 21 innovation development system, where we had clear
 22 stage gates for product development, and then within the
 23 stage gates are key decisions, key milestones, to allow
 24 a project to be assessed at each stage, and then to be
 25 taken forward, if it successfully completes each stage,

1 or to be dropped if it doesn't. So it was that, and it
 2 was also looking for a software platform that we could
 3 run this on so people can access it, we can see where
 4 each project is, we can get better reporting from it.
 5 That was the goal.
 6 Q. Did you do that?
 7 A. Yes, we did, and that's where the innovation development
 8 system came from.
 9 Q. I see.
 10 When you built the IDS system, did you specifically
 11 look at K15 and its development history?
 12 A. Not its history, no. We took it on the project --
 13 I think I started to look at that in around September.
 14 Q. Of 2000-and ...?
 15 A. 14.
 16 Q. Right.
 17 A. By then it had already been worked on as a sort of
 18 chemical development to improve the thermal performance
 19 of the product, and it had had an 8414 test done, and it
 20 had some small-scale tests done, they'd done some trials
 21 on the line, and I think the idea there was: well, we've
 22 gone through some of the stages already at this
 23 juncture, but we're at the stage now where we would like
 24 to move it forward into production, if we can.
 25 Q. You're talking about K15, are you?

1 A. I'm talking about low lambda K15.
 2 Q. I understand. We'll come to low lambda later on.
 3 A. Oh.
 4 Q. In relation to K15 being sold into the market at that
 5 time, what did your work on the PPDS, converting it into
 6 the IDS, that you have described, what did your work on
 7 K15 require you to look at?
 8 A. I didn't look at the current product.
 9 Q. You didn't look at the current product?
 10 A. No.
 11 Q. So are you saying that the IDS as you were developing it
 12 was only in relation to a future --
 13 A. Yes.
 14 Q. -- or test or trial product, a variant of K15 then being
 15 sold?
 16 A. Yes, that's correct.
 17 Q. I see. So does that tell us that when you looked at the
 18 PPDS as it came to you, you didn't go back over K15 and
 19 its history and look at the documents which --
 20 A. No, no.
 21 Q. You didn't, right.
 22 Now, you say in your first statement at
 23 paragraph 2.6, page 4 {KIN00000494/4}, that in this role
 24 as product development manager:
 25 "My responsibilities included ensuring that that

13

1 a robust development process was in place to allow cross
 2 functional teams to ensure all relevant legislation and
 3 regulatory requirements were fully taken into account
 4 during product development."
 5 Does the legislation and regulatory requirements
 6 include legislation and requirements relating to
 7 fire safety or fire performance?
 8 A. It would be any regulation that's related to the
 9 particular application or product that was being
 10 developed, so it would include that for certain
 11 projects, yes.
 12 Q. Now, you say, as you do, that testing and certification
 13 was also part of your role. Did that include
 14 large-scale fire testing?
 15 A. It wasn't part of my role; it was part of the role of
 16 designing a system which accounted for that.
 17 Q. I see.
 18 A. So the system works on a matrix basis, really, of
 19 a project manager who will design the programme, but
 20 then you'll have the relevant departmental experts who
 21 would feed into that programme, and that would include
 22 anybody in design, production, testing, certification,
 23 marketing, et cetera.
 24 Q. Now, you say in paragraph 2.6 there that your role was
 25 to ensure that a robust development process was in place

14

1 to ensure that all relevant legislation and regulatory
 2 requirements were fully taken into account during
 3 product development.
 4 Do you mean there that the process was to ensure
 5 compliance, or merely that compliance was thought about?
 6 A. It was to ensure the right people who knew about the
 7 compliance were involved in the project.
 8 Q. What about making sure that the right people actually
 9 did their work properly and ensured that the product did
 10 comply, was that not also part of your role?
 11 A. No, that's part of whoever's responsibility it is to
 12 deliver that element of it. That's their
 13 responsibility.
 14 Q. But those teams would report to you, would they not?
 15 A. They would report in to the IDS team. So there was
 16 a monthly IDS review meeting, and they would then report
 17 their findings into that, into that team.
 18 Q. Was your role, in this first role, to oversee the
 19 activities of those teams and to make sure that they
 20 were doing their job?
 21 A. It was to make sure they were on plan.
 22 Q. On plan?
 23 A. To the target, yes.
 24 Q. But what about making sure that they were doing their
 25 job and making sure that the products they were

15

1 developing were compliant with regulatory requirements?
 2 A. That would be their job, to make sure that they were
 3 doing their job.
 4 Q. Would it not also be your job to make sure they were
 5 doing their job, so to speak?
 6 A. I trusted -- yeah, I've got a -- I don't know all the
 7 ins and outs of every part of every product, and no
 8 project manager will, so you've got to trust the people
 9 that are doing the allocated parts in their areas to do
 10 their role.
 11 Q. Right.
 12 Now, you say that the aim was to ensure that
 13 a robust development process was in place. Was there
 14 a view within Kingspan at that point that the process,
 15 as it stood at that time, was not robust?
 16 A. No, I don't think so. I just -- that was just how --
 17 you know, I wanted to make this new one robust. It
 18 didn't mean the other one wasn't.
 19 Q. And the robust development process you're referring to,
 20 is that the IDS system you have described?
 21 A. Yes.
 22 Q. How was the information on that system stored within the
 23 Kingspan information technology platforms?
 24 A. So we've got a platform for IDS which is called
 25 Planview, it's the software provider, and on there you

16

1 can store the timing plans, you can store the updates,
 2 the minutes for the gate reviews, and then we can also
 3 do reporting from that on certain milestones.
 4 Q. Would communications with testing houses such as the BRE
 5 or BRE reports or class reports be filed on to that
 6 platform?
 7 A. They wouldn't be on to that platform, but they would be
 8 on to the projects file that went with it.
 9 Q. And could anybody in those teams and you access that
 10 whenever you wanted?
 11 A. Not all of -- not everybody could access everything.
 12 Q. Could you access it?
 13 A. I could access certain parts, not all of it.
 14 Q. Which parts could you not access?
 15 A. Well, I really wouldn't have direct access into the
 16 individual project files that were kept, but the timing
 17 plan elements, we could look at that from a -- from the
 18 software.
 19 Q. Why wouldn't you have access into the individual project
 20 files?
 21 A. Because I wouldn't have needed to look into it
 22 individually.
 23 Q. I can understand why you might not have wanted to or
 24 even needed to, but were you actually denied access?
 25 A. No, I don't think I was denied --

17

1 Q. Right, so if you wanted --
 2 A. I probably just didn't use it.
 3 Q. I follow.
 4 Now, as a product development manager, who did you
 5 report to? I think you said your boss initially was
 6 Malcolm Rochefort.
 7 A. That's correct.
 8 Q. Did he remain your line manager for the period you
 9 occupied that role, which wasn't very long?
 10 A. It wasn't very long. So I think he retired in December
 11 of 2014, and then by then I was in the marketing role,
 12 so I was reporting to Richard Burnley. So there was
 13 a crossover.
 14 Q. So, just to be clear, from the time you were appointed
 15 into this role in December or so 2013 until the time you
 16 were appointed into the marketing role, I think, in
 17 November 2014, you were reporting to Dr Rochefort?
 18 A. Yes, correct.
 19 Q. And after that, November 2014 onwards, you were
 20 reporting to Richard Burnley?
 21 A. Correct.
 22 Q. And he was the managing director at that stage, was he
 23 not?
 24 A. Yes, he was.
 25 Q. Yes, I see.

18

1 Now, as product development manager, you I think
 2 were in charge of a new version of Kingspan K15, which
 3 was the low lambda version; is that right?
 4 A. No, I wasn't in charge of it. That project had already
 5 started, like I mentioned before, and it was -- it had
 6 gone through some of what we would now call the
 7 stage gates. They weren't called that in the PPDS
 8 system, but they would be in the new system. I was then
 9 asked to look at developing the programme to take it
 10 further, and used it as, you know, one of the pilot
 11 products, alongside the other ones, to use the system
 12 on.
 13 Q. Were you involved in any fire testing of that product?
 14 A. No.
 15 Q. Was there anyone at Kingspan who was more closely
 16 involved in the development of this low lambda product
 17 of K15 than you?
 18 A. Yes, Dr Rochefort on the chemistry side of it; on the
 19 fire testing side of it would have been Ivor Meredith;
 20 and on the processing side, actually trying to process
 21 this new material, would have been Gwyn Davies.
 22 Q. Gwyn Davies?
 23 A. Yeah.
 24 Q. And Ivor Meredith and Gwyn Davies would have reported
 25 ultimately to you on that project, would they not?

19

1 A. They'd have reported in to the -- on the -- at the IDS
 2 gate review meeting on those developments.
 3 Q. Right. It comes to the same thing, I think: that in the
 4 end, although they reported in -- I'm not quite sure
 5 I understand the difference -- in the end, who was their
 6 line manager in respect of that development process on
 7 that product?
 8 A. I'm not sure who their line manager -- direct line
 9 managers would have been, but they would definitely have
 10 been reporting in to me on what was happening on that
 11 project.
 12 Q. All right.
 13 Who else did you work with on the development of
 14 phenolic foam generally at that time?
 15 A. So it may have been Linzi Hobbs was another one of the
 16 processing people, Tony Millichap would have been
 17 involved at the early ... at my early stages of that.
 18 Q. Now, you were promoted to head of marketing in
 19 November 2014, as you say in your statement.
 20 A. Yes.
 21 Q. Was that promotion by Richard Burnley?
 22 A. Yes.
 23 Q. Did he promote you?
 24 A. Yes, he did.
 25 Q. Was there a competition for that post?

20

1 A. There was one other person, I think, who had expressed
 2 an interest in the role.
 3 Q. Who was that?
 4 A. Peter Morgan.
 5 Q. Were you both interviewed?
 6 A. I believe so.
 7 Q. When you say "expressed an interest", was there actually
 8 a competition and a choice was made by Mr Burnley of the
 9 two of you?
 10 A. I think he definitely spoke to both of us.
 11 Q. Right.
 12 Now, was it at this time -- so this is
 13 November 2014 -- that Kingspan decided that the low
 14 lambda version of K15 was not viable?
 15 A. There was definitely a point in the programme where,
 16 from the processing side, the programme was stopped
 17 because we couldn't process it to get the objective of
 18 a consistent lower lambda performance from the system.
 19 Q. Do you remember, when you took over the job of head of
 20 marketing in November 2014, what stage the low lambda
 21 project had reached?
 22 A. No, I think it was still ongoing.
 23 Q. When did it actually finally stop, do you remember?
 24 A. I can't recall exactly when it stopped.
 25 Q. Right.

21

1 Let's look at paragraph 2.7 of your first statement,
 2 please, at the bottom of page 4 {KIN00000494/4}, which
 3 I think is on the page in front of us. You say:
 4 "In November 2014 I was promoted to Head of
 5 Marketing at Kingspan. In this role, I was responsible
 6 for the day to day management of the marketing team
 7 whose function was the creation and delivery of
 8 marketing plans and campaigns. This included the design
 9 and production of all marketing materials such as
 10 product brochures and newsletters. The team was also
 11 responsible for the development of technical research
 12 projects and Kingspan's fire safety compliance campaign
 13 regarding the use of K15 in rainscreen specifications."
 14 What knowledge did you have of K15 and its fire
 15 performance at the time you took on the role of head of
 16 marketing at that time?
 17 A. Very little. It was part of the learning curve
 18 I had of all of the products that we produced. We
 19 produced many different products and processes.
 20 Q. You say it was part of the learning curve; did you have
 21 a handover at that stage?
 22 A. No, there was nobody currently in that role.
 23 Q. No.
 24 A. I think the previous --
 25 Q. An induction, then?

22

1 A. A previous incumbent had left 12 months maybe before,
 2 but there was the marketing director, John Garbutt, who
 3 I was sort of dotted line, if you like, into, and was
 4 there to help me, you know, get on to that learning
 5 curve.
 6 Q. So just help me with this: you were head of marketing,
 7 but John Garbutt remained in post, did he?
 8 A. Yeah, John Garbutt was divisional director of marketing.
 9 So he had previously been the lead marketing person in
 10 Kingspan Insulation. He had then taken a divisional job
 11 at some point, I don't know exactly when. There was
 12 a marketing manager appointed when he moved up. That
 13 marketing manager left. I think it was then a long gap
 14 before they'd recruited a replacement, which was me.
 15 Q. Right. Only I thought you told us earlier that your
 16 line manager when you were appointed to this role in
 17 November 2014 was Richard Burnley.
 18 A. That's why I say dotted into John Garbutt, yes.
 19 Q. When say dotted line, do you mean a vaguer reporting
 20 line to John Garbutt?
 21 A. Yes.
 22 Q. I see. You called him director of marketing, I think,
 23 a minute ago. Is that right, was he director of
 24 marketing?
 25 A. Yes, I believe so.

23

1 Q. But you were head of marketing?
 2 A. I was head of marketing.
 3 Q. How do those two roles relate to each other?
 4 A. Because in the structure of the business -- so the
 5 Insulation UK business has got businesses across the
 6 world, and so I was part of the GB part of that
 7 business.
 8 Q. I see.
 9 A. But then there was a structure above the management of
 10 those where divisional directors sat, which oversaw all
 11 of the key functions across the globe.
 12 Q. Now, you say at the top of page 5 in your statement
 13 {KIN00000494/5} that you were responsible for Kingspan's
 14 fire safety compliance campaign regarding the use of K15
 15 in rainscreen specifications; what was the nature of the
 16 safety compliance campaign?
 17 A. That was the route to compliance campaign I mentioned
 18 there, I think, and that was -- when I took over at the
 19 time, there was a lot of, I think -- within the business
 20 a view that customers weren't understanding the
 21 processes of compliance to various routes. The
 22 technical teams were getting lots of queries, the sales
 23 teams were getting lots of queries, so there was
 24 a desire to put something together which would help
 25 people understand, I think with that BCA guidance note

24

1 which had come out earlier, exactly what that meant, and
 2 what were the four routes to compliance, and that's what
 3 we set out to try and educate people on.
 4 Q. You say four routes to compliance; do you mean three?
 5 A. Well, one gets mixed up as two sometimes.
 6 Q. Indeed.
 7 A. So I think there were four, but with the desktop studies
 8 is a fourth option.
 9 Q. Right. We can perhaps look at this a little bit more
 10 closely later on.
 11 When you were appointed to this role, and you say
 12 you took over or you started Kingspan's fire safety
 13 compliance campaign, that was in relation to K15 in
 14 particular. What did you look at by reference to
 15 previous tests, underlying documents, email runs, test
 16 reports, classification reports for K15 when developing
 17 the fire safety compliance campaign you refer to?
 18 A. So I think the programme had started and one of the key
 19 marketeers had started to talk to the technical team to
 20 understand what the regulations were. It was very much
 21 driven by what the technical team understood at the time
 22 of what the regulations were and what the BCA guidance
 23 meant, and so we were looking at that from the
 24 information provided by the technical team.
 25 Q. What did the technical team tell you about K15 and its

25

1 test history?
 2 A. So I understood there was an older test from 2005, there
 3 was another test which was done in, I think, 2014, and
 4 there was a programme ongoing to continue with the
 5 testing plan.
 6 Q. You say you understood there was an older test from
 7 2005.
 8 A. Yes.
 9 Q. Let's just look at that a little bit more closely.
 10 When did you understand or learn that there was
 11 a 2005 test?
 12 A. I don't know exactly when, but it would have been while
 13 we were developing that routes to compliance document.
 14 Q. Did you start developing the routes to compliance
 15 document on your appointment in November 2014?
 16 A. I think it had already started there, and I took it --
 17 Q. You took it over?
 18 A. Yeah.
 19 Q. Who started it?
 20 A. I think -- well, there was a marketeer,
 21 Reshma Roodurmun, had started to work with Ivor and
 22 Tony, I think, to start it off.
 23 Q. Okay. So coming back to your evidence a minute ago that
 24 you understood that there was an older test from 2005,
 25 did you discuss that test with anybody or see the data

26

1 from that test or the test report, the BRE test report?
 2 A. Not at that time.
 3 Q. Not at that time. Why is that?
 4 A. Because I didn't think I needed to. I was relying on
 5 the information being provided by the teams.
 6 Q. Did you discuss the 2005 report with anybody?
 7 A. Not at that time.
 8 Q. Was it not important for you really to understand the
 9 2005 report, given that it was -- well, let me just ask
 10 you: did you look and see how K15 was being marketed
 11 when you took over this role?
 12 A. Yes, I did, as part of that routes to compliance
 13 document.
 14 Q. What marketing documents did you look at?
 15 A. So there was -- the document in place at the time,
 16 I think, was the 2011 --
 17 Q. The datasheet?
 18 A. -- version of the literature, yes.
 19 Q. Yes, we don't need to look at it did, but --
 20 A. No.
 21 Q. -- do you recall that that referred specifically to
 22 a BS 8414-1 test in 2005?
 23 A. Yes, I understand it did --
 24 Q. So when you took over the role, you would have known
 25 straightaway that there was a BS 8414-1 test for 2005

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1 for Kingspan K15.
 2 A. That's correct, yes.
 3 Q. Did you ask anybody a little bit more about that or --
 4 A. No.
 5 Q. Why is that?
 6 A. It was already in place, and I was moving -- I was
 7 looking to move forward, I wasn't looking back at all.
 8 Q. Given that you were embarked upon a fire safety
 9 compliance campaign, as you describe it, and looking to
 10 understand the BCA's Technical Guidance Note 18 from
 11 June 2014, as you have just explained, I would just like
 12 to understand a bit more about why you didn't involve
 13 yourself a little bit more about understanding precisely
 14 how the test had taken place and what it had involved?
 15 A. Because I didn't think I needed to, you know, the
 16 information was there, the experts were there in the
 17 technical team.
 18 Q. What about the July 2014 test you have referred to? You
 19 said there was a 2014 test for K15.
 20 A. Yes.
 21 Q. Similarly, did you look at the detail of that, what was
 22 tested, the test reports for that?
 23 A. No, I didn't, not in the marketing role.
 24 Q. Right.
 25 Who did you work with predominantly on this

28

1 fire safety compliance campaign after it started, after
 2 your involvement started in November 2014?
 3 A. So it would have been Reshma from the marketing team,
 4 and then it would have been Ivor and Tony primarily from
 5 the technical team.
 6 Q. Right.
 7 Now, we will come back to some of this material
 8 later on, I think, but just moving on in your career,
 9 you were then I think appointed to a new role as head of
 10 technical and marketing, Great Britain, in May 2015,
 11 weren't you?
 12 A. Yes, that's correct.
 13 Q. When you were appointed, did your marketing
 14 responsibility continue as it had?
 15 A. It did.
 16 Q. So can we take it from that that the technical role was
 17 an addition, a superaddition, to that role?
 18 A. It was.
 19 Q. Was the technical aspect added to your role as head of
 20 marketing because Tony Millichap, who had been head of
 21 technical, left Kingspan in May 2015?
 22 A. That's correct.
 23 Q. I see.
 24 In your new role, is it right that you thereafter
 25 held overall responsibility for the entire technical

29

1 side of the business?
 2 A. Not the whole technical side, because there are two
 3 elements to technical: there's technical applications,
 4 which is what Tony was in charge of, and then there's
 5 technical processing. So previously, when
 6 Malcolm Rochefort was technical director, he oversaw
 7 both sides of that, and Tony would have reported in from
 8 the applications side of it. When Malcolm left, that
 9 role got split out into different people. So I think
 10 Gwyn Davies took on the processing side of that, and
 11 Tony Scott, eventually, when he was recruited, took on
 12 the sort of R&D element of it, and then the applications
 13 side sat with Tony and then subsequently over to me.
 14 Q. I see. So those individuals you have referred to,
 15 Gwyn Davies and Mr Scott, they reported directly to you?
 16 A. No, no, they're senior directors. They were group --
 17 sorry, divisional directors.
 18 Q. Oh, I see.
 19 A. Which was the same level that Malcolm was at.
 20 Q. I see. But did you then report to them?
 21 A. No, I reported to Richard Burnley.
 22 Q. I see. Okay. They were senior to you, but they were
 23 involved in something, but you didn't report to them and
 24 they didn't report to you?
 25 A. That's correct.

30

1 Q. Right. Okay. I'm slightly puzzled by that.
 2 What sort of relationship in terms of the corporate
 3 structure did you have with, for example, Gwyn Davies?
 4 A. Well, open relationship --
 5 Q. I don't mean personally, I mean professionally.
 6 A. Yeah, I meant professionally, but --
 7 Q. In responsibility terms.
 8 A. It's probably better if I try and explain the structure.
 9 So we've got that divisional team where
 10 Malcolm Rochefort covered two roles in that divisional
 11 team, which was -- well, three, really: it was R&D,
 12 processing and applications. And then when he left,
 13 that got split up, so processing and R&D got split up,
 14 and there wasn't a divisional director then responsible
 15 for applications. So applications just sat down then
 16 with the head of technical role.
 17 Q. When you refer to applications, I just want to be clear
 18 what you mean.
 19 A. So applications would be understanding how a product
 20 would go into a roof, a floor or a wall.
 21 Q. Oh, I see.
 22 A. Those type of applications.
 23 Q. Where you would put it?
 24 A. Yes.
 25 Q. I follow. So you would actually have somebody

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1 responsible for deciding where a product would go on
 2 a building?
 3 A. Yes.
 4 Q. Or its appropriateness for that place?
 5 A. Correct.
 6 Q. Right.
 7 Who was in charge of applications when you occupied
 8 your role from May 2015 as head of technical and
 9 marketing?
 10 A. That would be my role.
 11 Q. That would be your role?
 12 A. Yes.
 13 Q. Right.
 14 Now, how often did you meet with the technical team
 15 from May 2015?
 16 A. So I try and sit down with the technical team on
 17 a monthly basis, but, you know, I saw them more
 18 regularly than that. Open-door policy and ...
 19 Q. Right. You say open door; was your office an open-plan
 20 office where you sat and could easily --
 21 A. Yes. After Tony left, I moved into his office. I was
 22 on a different floor when I was in the marketing team,
 23 but when Tony left, I went into his office.
 24 Q. Right. I see.
 25 These meetings with the technical team, were they

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1 face-to-face or were they remote?
 2 A. No, generally face-to-face.
 3 Q. When you met with the technical team, did you brief
 4 yourself first? Did you look at documents, plans,
 5 reports before meeting the technical team?
 6 A. Generally what I would do is I would get them to just
 7 update me on the key areas they were working on, and
 8 then I would use that as an agenda moving forward for
 9 the next meeting, so ...
 10 Q. When you became head of technical, what processes were
 11 in place, if any, to ensure that accurate technical
 12 advice was being provided by technical advisers working
 13 on the front line, if I can put it that way, dealing
 14 with customers?
 15 A. So there was -- there's different levels of adviser.
 16 You've got your frontline adviser, if you like, so that
 17 would be the entry level role, so they would get --
 18 before they were allowed to answer calls on their own,
 19 so to speak, they would go through a period of training
 20 with the more senior members of that team and the
 21 manager running the team, and then once they'd got to
 22 a certain level, they were then slowly fed into
 23 answering calls on their own, and generally that would
 24 be monitored by somebody else listening in for the first
 25 period of time until they'd got confidence, they thought

1 they knew what they were doing, and then they would be
 2 on their own. That process can take quite a long time,
 3 longer now than at first, because of just the sheer
 4 number of products that we now manufacture.
 5 Q. Who would --
 6 A. That's the process.
 7 Q. I'm so sorry.
 8 A. That's fine.
 9 Q. Who would do the monitoring that you have just referred
 10 to?
 11 A. So that would be the senior team leaders or the manager.
 12 Q. Did you make any changes to the way in which the advice
 13 was being given, the structure that you have just
 14 referred to, when you entered the role in --
 15 A. Not on the technical frontline advice team, no.
 16 Q. How did you, as head of technical, satisfy yourself that
 17 customers were being given accurate advice by Kingspan
 18 about the use of Kingspan products?
 19 A. Just by relying on that process and the management of
 20 that process by the line managers.
 21 Q. You let them get on with it?
 22 A. Yeah.
 23 Q. You didn't spot-check that they were doing it right
 24 or --
 25 A. No, I mean --

1 Q. -- in any other direct way?
 2 A. My role was very managerial, you know, some of the
 3 detailed technical information they'd be providing,
 4 they'd be more knowledgeable on it than I would in
 5 detail. So my main role was on sort of managing that
 6 team, rather than understanding, you know, the finite
 7 technical detail.
 8 Q. Did that team report back to you regularly?
 9 A. Via the manager.
 10 Q. If there were any difficulties being encountered by
 11 frontline technical advisers from customers about
 12 applications, would that filter up to you?
 13 A. It could do if it couldn't get resolved.
 14 Q. Do you remember whether there were any particular
 15 difficulties after May 2015, indeed after November 2014
 16 when you were appointed to head of marketing, about K15
 17 and its use over 18 metres?
 18 A. Not in the marketing role. In the technical role, there
 19 were definitely queries coming in which I knew we were
 20 struggling to answer, the teams were struggling to
 21 answer, and that's when I think they'd set up a separate
 22 high-rise inbox so that Ivor and the project team could
 23 answer those questions, the more senior people could
 24 answer those questions.
 25 Q. When was that?

1 A. I think Tony set it up, so it was in place when I took
 2 over. I don't know exactly the date, but ...
 3 Q. So when you came into the role in May 2015, there was
 4 a high-rise inbox already set up for questions?
 5 A. I believe so, yeah.
 6 Q. Were they questions specifically about K15?
 7 A. Yes, they would have been -- yes, because it was the
 8 only one really we were recommending for high-rise.
 9 Q. Did you ask why it was necessary or had been necessary
 10 to establish a high-rise inbox for K15?
 11 A. I asked really why -- what the issues we were getting --
 12 Q. Who did you ask?
 13 A. So that would have been Ivor Meredith, would have been
 14 the main --
 15 Q. What did he tell you?
 16 A. -- point of contact. He would say things like, you
 17 know, "They don't understand the routes to compliance,
 18 they're asking -- we've got retrospective applied
 19 products on a building asking for, you know, information
 20 and test evidence", and so -- and he was providing that
 21 data.
 22 Q. Right. So let's just be clear. You had a conversation
 23 or conversations with Ivor Meredith about customers
 24 asking questions about information and test data about
 25 K15. Do you remember when those conversations took

1 place?
 2 A. They wouldn't have been long after I started, because it
 3 was something that Ivor was very busy on.
 4 Q. Started in which role?
 5 A. In the technical -- head of technical role.
 6 Q. So that would have been May 2015, not before?
 7 A. No, correct, that's right.
 8 Q. I follow.
 9 Do you know how Ivor Meredith was providing data?
 10 A. As I understood it, they'd got a sort of standard set of
 11 responses that they were using, and usually just taking
 12 it on a project query by query basis.
 13 Q. You say a standard set of data; what is that? Is that
 14 like a template?
 15 A. Yeah, a standard response which they would then mould to
 16 suit the particular applications.
 17 Q. I see. Did you look at that standard response yourself?
 18 It's a script, is it, a document which tells you what to
 19 say?
 20 A. Usually on an email, yes. I don't think I looked at it
 21 in any great detail at the time.
 22 Q. Did you not familiarise yourself with this document when
 23 you came into your role in May 2015?
 24 A. I don't recall getting into the granularity of that to
 25 start with.

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1 Q. Did Ivor Meredith ever discuss whether that standard set
 2 of data, as you call it, standard response, was
 3 accurate?
 4 A. Sorry, could you ask that question again?
 5 Q. Did Ivor Meredith ever seek to have a discussion with
 6 you about whether that standard response was accurate?
 7 A. No, he would have -- I would have assumed that it was
 8 accurate from his discussions with me.
 9 Q. Were you concerned that there was a pattern of customers
 10 asking about K15 and its appropriateness for use over
 11 18 metres to such an extent that it was necessary to set
 12 up a designated inbox? Did that concern you?
 13 A. It did concern me, and I wanted to try and understand
 14 what was happening.
 15 Q. How did you go about understanding what was happening?
 16 A. I went to see a couple of customers at one stage,
 17 I think it would have been maybe July, just to go down
 18 and speak to them about what their issues were.
 19 Q. Right.
 20 A. And it was generally around the fact that we've now
 21 got -- we've put K15 into the application, and we
 22 need -- we now need -- we're now looking for some
 23 evidence to say that it was okay to do that, because the
 24 NHBC was questioning it, and it was those types of
 25 conversations.

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1 Q. So by July 2015 at the very latest, can we take it that
 2 this was a significant enough problem for you to leave
 3 the office and go and talk to customers about specific
 4 projects?
 5 A. I wanted to understand what was -- what Ivor was facing.
 6 Q. Who were these customers? Can you identify them?
 7 A. Oh, I think one was Sisk. We saw two on the same day,
 8 and I can't remember who the other one was.
 9 Q. Sisk?
 10 A. Sisk, yes, S-I-S-K.
 11 Q. I may be wrong here, but are they contractors?
 12 A. Yes, they might be, yeah.
 13 Q. And you can't remember the name of the other one?
 14 A. No, I went down with Mark Swift from -- there was
 15 a Kooltherm sales manager.
 16 Q. Where were these projects?
 17 A. London.
 18 Q. Do you know where?
 19 A. The meetings were in London.
 20 Q. Do you know where?
 21 A. No, I can't remember where.
 22 Q. Face-to-face meetings?
 23 A. Yes.
 24 Q. Do you remember whether they were set up by email, or
 25 whether there was a response, a thank you, a debrief

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1 afterwards by email?
 2 A. I can't. I can't recall.
 3 Q. Okay.
 4 When Tony Millichap left, was there a handover
 5 process?
 6 A. There was, I think, a month of time allocated to
 7 handover, yeah.
 8 Q. Did he actually give you a file and hand it to you and
 9 say, "This is what you need to look at to take on your
 10 role, let's go through it together"? Did anything like
 11 that happen?
 12 A. No, we just -- we were in different offices at the time,
 13 both very busy, so we didn't sit down all that often,
 14 but we just sat down and I was trying to understand
 15 particularly the frontline team, I had no experience of
 16 the frontline team, so we just generally caught up.
 17 Q. Did he express any particular concerns or raise any
 18 particular problems with you?
 19 A. About the products?
 20 Q. Yes, about products.
 21 A. No.
 22 Q. About anything else?
 23 A. I think he'd got concerns over Ivor and how Ivor was
 24 performing, so he sort of just told me to watch out for
 25 that, and one of the reasons why I wanted to go and see

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1 what he was dealing with.
 2 Q. Right.
 3 A. He was concerned with the workload that was coming
 4 through.
 5 Q. You say you wanted to go and see what he was dealing
 6 with. I'm just interested in this visit to Sisk because
 7 we, I am told, have not seen any documents about that at
 8 all.
 9 Can you remember, doing the best you can, whether
 10 there were any email communications with Sisk or about
 11 Sisk internally?
 12 A. No, I can't recall.
 13 Q. And you wouldn't have set up a meeting and done it all
 14 by telephone, I imagine?
 15 A. Ivor had set the meeting up, so it was Ivor and
 16 Mark Swift had set the meeting up, and --
 17 Q. Mark Swift?
 18 A. Yes.
 19 Q. Did Tony Millichap give you any information about the
 20 history of fire testing on K15 during the handover?
 21 A. Not that I can recall.
 22 Q. What about any past problems/concerns with the NHBC or
 23 on NHBC's part, did he discuss that with you?
 24 A. No, but I was -- I sort of got a vague awareness of the
 25 issue, the sort of recent issue, with the NHBC. I was

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1 copied in to a couple of the very early emails around
 2 that. So that was when I was in the marketing role,
 3 I think it might have been, and so I understood a little
 4 bit about that, but not into the detail which it
 5 involved afterwards.
 6 Q. We may come to that later in due course.
 7 Did Mr Millichap mention any complaints or problems
 8 coming from customers such as Wintech or Lakesmere, two
 9 names --
 10 A. No, I wasn't aware of Wintech or Lakesmere's complaints.
 11 Q. Moving forward in your career, coming back to that, you
 12 were then appointed in May 2019, I think, weren't you,
 13 to the post of director of technical, marketing and
 14 regulatory affairs for Kingspan Great Britain; is that
 15 right?
 16 A. That's correct, yes.
 17 Q. Was that a main board position?
 18 A. No, that's still within the GB, UK team. GB team.
 19 Q. So you're not on the main board?
 20 A. No.
 21 Q. Was there a competition for that role, do you remember?
 22 A. No, I don't believe there was.
 23 Q. Do you know who made the decision to appoint you, in
 24 addition to your roles as head of or director of
 25 technical and marketing, a director of regulatory

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1 affairs for Kingspan?
 2 A. Ralph Mannion, who is the current MD.
 3 Q. So he made that decision.
 4 Did you have a discussion with him, an interview
 5 with him, or did you just get told by him?
 6 A. No, we had a discussion.
 7 Q. Was that a pre-existing post?
 8 A. No, it's a new role.
 9 Q. Did he tell you why it was being created?
 10 A. I think just in recognition of efforts to date.
 11 Q. I see, a recognition of your efforts to date?
 12 A. Yes.
 13 Q. I see. So being appointed to regulatory affairs was, as
 14 it were, a reward for your efforts?
 15 A. Well, I was -- basically I'd already undertaken that
 16 work.
 17 Q. Right.
 18 A. So I was managing two people by then who were looking at
 19 our regulatory and public affairs.
 20 Q. Can you just tell us what efforts you were being
 21 rewarded for, or recognised -- your word -- for in the
 22 arena of regulation?
 23 A. So we'd -- I'd taken one of the -- it was a SAP adviser,
 24 a very experienced technical person, and I wanted to
 25 start to make sure that -- we got Brexit coming along,

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1 we knew Brexit was coming along, and I wanted to have
 2 somebody in post who could understand the regulations
 3 around the products as a whole and not just any one
 4 particular product, and also some of the more technical
 5 details around things like internal wall insulation,
 6 external wall insulation. There's a lot of other things
 7 we need to consider other than fire within those types
 8 of applications, so -- and he was in that, so I brought
 9 him on in that, and he was representing us at the CPA,
 10 technical meetings, for example, and in other areas.
 11 And then we'd taken on somebody to look at the sort of
 12 public affairs and look at the wider scope of the
 13 industry.
 14 Q. Who was this person, this SAP adviser?
 15 A. The SAP adviser was Jonathan Ducker.
 16 Q. We may come back to that in due course, but this is
 17 May 2019, isn't it?
 18 A. Correct.
 19 Q. So this is after -- is this right? -- the Hackitt
 20 Review?
 21 A. Yes.
 22 Q. The consultation in relation to that.
 23 A. Yes.
 24 Q. Now, did you do work in relation to Kingspan's
 25 consultation response to the Hackitt Review?

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1 A. Yes, it was a team approach.
 2 Q. Right, okay. Well, we'll come back to that, I think,
 3 perhaps later.
 4 Can we go to your second statement, please. I'd
 5 like to go to page 30 within it {KIN00020824/30}. You
 6 say on page 30 at paragraph 4.42:
 7 "As a result of the Grenfell Inquiry and my
 8 subsequent investigations, I became concerned that two
 9 of the BS 8414 tests referenced in Kingspan's marketing
 10 literature for K15 may have used non-standard K15 in the
 11 test. These were the 2005 Test where it appears the
 12 product was made from old technology and the first 2014
 13 Terracotta test which may have been produced for
 14 a development project for improved lambda performance".
 15 When did your investigations into those problems or
 16 issues begin?
 17 A. I think we started to look at that probably just around
 18 the time we became core participants to the Inquiry, and
 19 so that started the investigation into everything that
 20 was surrounding K15 and all of its historical testing
 21 and marketing, which is what's fed into obviously the
 22 witness statements and our evidence to date.
 23 Q. Can you be a bit more precise about dates?
 24 A. No, I can't recall exactly when.
 25 Q. What was the reason for starting those investigations

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1 you refer to?
 2 A. I think to provide evidence to the Inquiry.
 3 Q. Right. So is it that, but for the Inquiry, you wouldn't
 4 have started the investigations?
 5 A. I think to the degree which we have done, no, we
 6 probably wouldn't.
 7 Q. Right.
 8 We're going to go into this in some detail in due
 9 course, Mr Pargeter, but is it your evidence that,
 10 before undertaking these investigations in order to
 11 assist the Inquiry, you yourself were not aware -- not
 12 aware -- of any inconsistencies with fire testing or
 13 questions about whether the results of fire testing were
 14 genuinely representative of the K15 product then being
 15 sold?
 16 A. On the 2005 test, I did become aware in, I think, 2016,
 17 some point in 2016, that the description of the cladding
 18 panel seemed to be incorrect, and also that it was
 19 confirmed to me that it was done on old technology, so
 20 that we understood prior to then.
 21 Q. Indeed, and that's why I'm asking you the question,
 22 really. You see, at paragraph 4.42 you say that it was
 23 as a result of the Grenfell Inquiry and your subsequent
 24 investigations that you became concerned, as you say,
 25 that the BS 8414 tests referenced in Kingspan's

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1 marketing literature for K15 may have used non-standard
 2 K15 in the test, but you don't say there that you had
 3 known that fact, at least as a basic fact, in 2016, do
 4 you?
 5 A. I do say that elsewhere in my witness statements.
 6 Q. You do say that elsewhere, we'll come to it. My
 7 question is why you don't say it there.
 8 A. Probably because I know I explain about it later on or
 9 in a different part of the witness statement.
 10 Q. Well, can you just help me: is that first sentence
 11 correct or is it incorrect?
 12 A. I think maybe the word "concerned" is the key word
 13 there. When I became aware of it in 2016, I wasn't
 14 concerned about it. I understood what it was, I thought
 15 I understood what it was, and I wasn't concerned by it.
 16 Q. You see, we'll look at this in a moment, but it's not
 17 until your third statement in September 2020, so some
 18 weeks ago only, that you actually refer to becoming
 19 aware of this discrepancy in 2016.
 20 What I would really like to know is why that fact
 21 doesn't appear in either of your first two statements,
 22 and indeed, at paragraph 4.42, it appears to be
 23 contradicted. Can you explain that?
 24 A. No, I think this was just our -- my response to that
 25 particular question. I've no attempt to hide that I was

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1 aware of it earlier than then.
 2 Q. It's an odd sentence, I have to suggest to you, because
 3 it does suggest, although you use the word "concerned",
 4 that in fact you didn't know about the discrepancy that
 5 you refer to there until you started looking as a result
 6 of the Grenfell Tower Inquiry investigations.
 7 A. That's not -- it wasn't my intention to give that
 8 inference.
 9 Q. I see. So when we read paragraph 4.42, we should say
 10 you knew about it but only became concerned after
 11 the Inquiry had begun and your investigations as
 12 a result?
 13 A. Yes.
 14 Q. I see.
 15 Let's look a little bit more closely together, if we
 16 can, at the 2005 BS 8414 test. Just to put a figure in
 17 your mind, this is test number 220876. It's a number
 18 that comes up a lot in documents, and I just want to fix
 19 it in your mind and indeed in mine.
 20 Just to give you the factual summary of it, it's
 21 right, isn't it, I think, that on 31 May 2005, Kingspan
 22 undertook a BS 8414-1 test, so masonry, on a system at
 23 the BRE using K15 and a cement particle board?
 24 A. Correct, that's what the report says, yeah.
 25 Q. As I say, the report is 220876, and the test report

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1 itself is dated 8 December 2005. I'll just read the
2 reference into the record: it's {BRE00002511}. There is
3 a classification report in September 2015,
4 {KIN00000134}, if people want to look at that as we go.

5 I just want to ask you first about the K15 used in
6 the 2005 test, and I apologise in advance, we're going
7 to be jumping around between your witness statements as
8 we do this process, so bear with me.

9 Can we look first at your first witness statement,
10 please, {KIN00000494/12}, paragraph 4.13(a). You say
11 there:

12 "4.13. As at the Supply Date [this is May or
13 June 2015, that's the date of supply of K15 to the
14 Grenfell Tower site], Kingspan had commissioned BS 8414
15 test and classification reports for the following
16 BS 8414 tests of systems incorporating K15:

17 "(a) BS 8414 Part 1:2002 Test on a Phenolic
18 Insulated Rainscreen system (Test Report Number 220876,
19 dated 8 December 2005). The system tested included K15
20 with a UAC-manufactured cement particle board rainscreen
21 fixed to an aluminium railing system. The tested system
22 satisfied the BR 135 classification criteria ; however,
23 it appears that a formal report to certify this was not
24 commissioned until 2015."

25 Now, you say nothing more in your first statement,

1 October 2018, about that test, and nothing about any
2 inconsistencies or irregularities with it, do you?

3 A. No. I was just purely stating there what was in the
4 evidence at the supply date would have been on the
5 report.

6 Q. Now, this is of course late 2018, but at this stage,
7 of course, you knew, because you told us that you had
8 known that since 2016, that there was at least
9 a question mark about whether the K15 tested was the K15
10 now being sold --

11 A. Yes.

12 Q. -- and that had been sold after 2006.

13 A. Correct.

14 Q. So my question is: why didn't you refer to that in
15 paragraph 4.13 there?

16 A. I think we were doing our investigations and we needed
17 to be sure that, although there was -- we thought it
18 could have been old tech and new tech, we needed to be
19 sure exactly what it was.

20 Q. Why not just say, "We have this concern, we're still
21 investigating, we'll come back to you"?

22 A. I think I was just putting what was in evidence at the
23 time for people to see at the time of the supply, not
24 what was known later.

25 Q. Right. Well, let's track it through.

1 We then go to the same test as you refer to it in
2 your second statement. Let's look at that. That's
3 18 October 2019, page 94 {KIN00020824/94}, please. At
4 paragraph 10.30 there, under the heading "2005 BS 8414
5 Test", you say:

6 "As I have explained above, I was not involved in
7 the 2005 BS 8414 Test but during my time as Head of
8 Technical, I became aware that the K15 being produced at
9 this time may have been manufactured from a process
10 referred to as 'old technology'. I was not aware as to
11 when the product manufactured and sold on the market
12 changed from 'old technology' to the current product or
13 whether there was any significant difference between the
14 two processes or in the performance, fire or otherwise
15 of the resulting products. However, as a result of
16 information which has come to light as a result of this
17 Inquiry I understand that 'new technology' may have been
18 employed in the production of K15 at Pembridge from
19 September 2006."

20 Then you go on to say, at page 95 {KIN00020824/95},
21 if we can just turn the page, at paragraph 10.33 there,
22 the last sentence:

23 "Given the change in technology, however, Kingspan
24 has removed the 2005 BS 8414 Test Report from its
25 website."

1 Do you know when the 2005 test report was removed
2 from Kingspan's website?

3 A. I think it was March 2019.

4 Q. March?

5 A. Yes.

6 Q. So some six months before this witness statement, which
7 is October --

8 A. Yes --

9 Q. -- 2009?

10 A. -- I think so.

11 Q. Right. The reason you give is the change in technology
12 from old to new. When the decision was made -- well,
13 who made the decision? That's the first question.

14 A. The decision about?

15 Q. To withdraw the test from the website.

16 A. I think it was a group decision from the team involved
17 in the Inquiry that, with what we understood then about
18 that test, it was prudent to withdraw it from the
19 website.

20 Q. Right. Now, who was in that team?

21 A. Well, Gwyn Davies is part of that team; our lawyers,
22 group counsel, part of that team; John Garbutt is part
23 of that team.

24 Q. Who in the corporate sense made the decision to remove
25 the test report from the website? Who actually made the

1 ultimate decision within Kingspan to take it down?
 2 A. I would say that probably from a corporate sense would
 3 be Lorcan Dowd, our group --
 4 Q. Right. Was there a report about the recommendations and
 5 the findings which led to that decision?
 6 A. I think there are some notes on that from the -- which
 7 the lawyers have got.
 8 Q. Are there any notes within the company that lead to the
 9 decision?
 10 A. Not that I can specifically --
 11 Q. Right.
 12 A. -- refer to.
 13 Q. I just want to be clear about this. Are you telling us
 14 that the decision-making process was all done as
 15 a result of legal advice or as part of legal advice
 16 being given? It's important I know that.
 17 A. I think they were certainly involved in a lot of the
 18 work obviously post -- or our involvement within
 19 the Inquiry, yes.
 20 Q. I don't want to know about the legal advice, because
 21 I know it's not right you should tell me, and indeed you
 22 can't, so be careful what you say here, but what I want
 23 to know is whether there are any documents which show
 24 the decision being made as a result of the legal advice
 25 being given.

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1 A. I'm not 100% sure.
 2 Q. Right. But it's right, I think, that the change in
 3 technology from old to new was something that had been
 4 known to Kingspan in the 11 years that the 2005 test
 5 report had been used by Kingspan up to that date.
 6 A. That's correct.
 7 Q. Was that not a concern to you at the time, March 2019?
 8 A. Not really, in that --
 9 Q. Really?
 10 A. Because from what I understood, and still do understand,
 11 the difference between the technologies is relatively
 12 small; it's not a big change in the chemistry, it was
 13 more of a change in the processing of the product to
 14 ensure we could make it more effectively and
 15 efficiently, and that's how I understood -- and still
 16 do, to quite a large extent -- the degree of the
 17 difference between old and new tech.
 18 Q. Well, we'll come to explore that in due course. But it
 19 was sufficiently important, wasn't it, for a decision to
 20 be made at the highest level to remove this
 21 long-standing test report from Kingspan's website?
 22 A. Yes, I think it was out of an abundance of caution on
 23 it. I think, would we classify it as a small change or
 24 a large change? And I think, you know, on balance we
 25 felt -- the team felt that it would be a fairly

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1 significant change, so -- in the process, not so much in
 2 the product, but it was then, as a result, felt it was
 3 different enough to no longer require --
 4 Q. Yes.
 5 A. -- rely on it.
 6 Q. If we go to your third witness statement,
 7 {KIN00022610/52}, please, let's look together at
 8 paragraph 7.1 at the top of that page. You're asked the
 9 question, there's a bit of a run-up to it:
 10 "When, specifically, did this information come to
 11 your knowledge?"
 12 That's about the change. Your answer is:
 13 "I think I first became aware that the 2005 BS 8414
 14 test may have used a different version of K15 than sold
 15 post-2006 towards the end of 2016. My detailed
 16 understanding of the issue started to develop from the
 17 end of 2018 onwards."
 18 Now, if you were aware of the fact that the 2005
 19 test had been undertaken with a different version of
 20 K15, at any stage in 2016, even without the full
 21 details, why is there no mention of that in your first
 22 witness statement, which is October 2018?
 23 A. Because again I -- it wasn't really fact. We suspected
 24 it was, Gwyn Davies suspected it was, if it was in 2005,
 25 so again needed to be sure of exactly when the crossover

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1 was. But I did know that there was a potential that was
 2 in old technology.
 3 Q. So does it follow that from some point in 2016, you say
 4 towards the end of that year, you had been aware that
 5 Kingspan was continuing to rely on a large-scale BS 8414
 6 fire test that did not represent or might not have
 7 represented the product then being sold to the market?
 8 A. That's correct.
 9 Q. But nonetheless you allowed that product to continue to
 10 be sold as if it were until -- well, until 2020,
 11 in fact?
 12 A. Yes, because, you know, I was advised by Gwyn Davies
 13 that the performance in fire would not have been any
 14 different, so I didn't have any concerns about its
 15 performance in fire, just that it was a processing
 16 change, and part of the process of development of the
 17 K15 product, so I wasn't concerned by it. So that's why
 18 I continued to rely on it.
 19 Q. You say you weren't concerned by it. I want to explore
 20 that.
 21 Other than removing the 2005 test report from
 22 Kingspan's own website, did you actually do anything in
 23 2016, or after 2016 until March 2019, to have the test
 24 report removed from circulation or withdrawn?
 25 A. No, I didn't.

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1 Q. Did you do anything in 2016 or after that year to
 2 investigate how it could be that for 11 years, perhaps
 3 10 years or so, up to that point, K15 was being sold to
 4 the market which was not the same product as had been
 5 the subject of the 2005 test?
 6 A. No, I didn't, because it was -- you know, I assumed it
 7 was common knowledge within the organisation, it had
 8 been there for a long time, and people, you know, had
 9 understood the changes a lot better than I during the
 10 process, so I didn't take any further steps.
 11 Q. You didn't take any further steps.
 12 Once the Grenfell Tower fire had happened, were you
 13 not concerned, from June 2017, that customers were still
 14 buying K15 on the basis of a BS 8414 test which was
 15 a test done on a different product?
 16 A. No, because I didn't expect that there was any
 17 difference in the fire performance. It wasn't something
 18 that --
 19 Q. You didn't expect there was any difference in the fire
 20 performance?
 21 A. No.
 22 Q. Did you actually seek to get to the bottom of that
 23 question and have it absolutely and thoroughly answered?
 24 A. We have as a team tried to do that as well, and we're
 25 still -- I'm still not convinced there is a large

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1 difference, any difference in fire performance from the
 2 2005 product and the product that we're producing today.
 3 Q. If, as you say, you weren't concerned that there was any
 4 difference, and that you were able to continue selling
 5 it without withdrawing it, why withdraw it then in
 6 March 2019?
 7 A. I think because --
 8 Q. From the website.
 9 A. Yeah, exactly. The team view was that even though the
 10 belief is that there is no difference in fire, that,
 11 you know, on reflection, we should withdraw it from now
 12 on.
 13 SIR MARTIN MOORE-BICK: Can you help me with this. I think
 14 you said earlier, and we've heard this evidence from
 15 other people, that Mr Meredith was the man who was most
 16 involved in fire testing of products, including K15.
 17 A. Correct.
 18 SIR MARTIN MOORE-BICK: Did you ever ask Mr Meredith about
 19 the relative performance of old technology and new
 20 technology in fire?
 21 A. No, I didn't specifically.
 22 SIR MARTIN MOORE-BICK: Wasn't he the obvious person to ask?
 23 A. Well, in 2016, he wasn't in the business.
 24 SIR MARTIN MOORE-BICK: Oh, I see. You didn't ever ask him
 25 earlier?

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1 A. I don't recall any discussions specifically about old
 2 technology and new technology.
 3 SIR MARTIN MOORE-BICK: No.
 4 All right, thank you.
 5 MR MILLETT: Once you discovered in 2016 that what was being
 6 sold was not what had been tested, did you take any
 7 steps to inform the market by revising your product
 8 literature?
 9 A. No, I didn't.
 10 Q. Why not?
 11 A. Because, like I say, I wasn't concerned. I thought the
 12 fire performance was the same, and it was extensively
 13 the same product, it was just produced, you know, in
 14 a different method.
 15 Q. What precisely led you to the view that it was the same
 16 fire performance?
 17 A. Just by discussions with Gwyn Davies, for example, who
 18 believed at the time, I think still does as well, that
 19 the fire performance was always been a C-s -- in the
 20 Euroclass, a C-s1, d0.
 21 Q. To the best of your knowledge, what was Gwyn Davies
 22 basing his information on?
 23 A. Just his experience, I think. He would have been around
 24 at the time of the technology transfer.
 25 Q. Why did you not seek either to take expert independent

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1 external advice about whether the fire performance was
 2 the same on the product being sold as it had been on the
 3 2005 test, or do a test?
 4 A. I don't know where we would have gone to have got
 5 independent advice on the fire performance of the old
 6 technology.
 7 Q. Did you realise from late 2016 that you were continuing
 8 to market K15 for compliant use above 18 metres on the
 9 basis of the 2005 test, which by then you knew had been
 10 done on a different product?
 11 A. Yes, I was aware that was still in the literature.
 12 Q. And that was clearly misleading literature, wasn't it?
 13 A. I don't think it was misleading, certainly not
 14 deliberately. I'd checked it out, as far as I could at
 15 the time, and I was assured -- reassured that the fire
 16 performance was the same, so ...
 17 Q. You say not deliberately -- and we will come to this,
 18 but I feel I need to pursue this right now -- but given
 19 that you knew that the products were different and the
 20 customers did not, it surely must have occurred to you
 21 that when they read the marketing literature relying on
 22 the 2005 test, they would be misled by that.
 23 A. But different in what sense? They -- you know, they
 24 weren't different in the performance that they were
 25 looking at in terms of that fire test. They were --

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1 you know, they were the same performance in fire. So
 2 they weren't different.

3 Q. So why not tell them candidly that although the 2005
 4 test was done on a different product, you do not believe
 5 that the new product would perform any differently, so
 6 that the customer buying K15 for use above 18 metres
 7 would know precisely what it is they were buying?

8 A. That could have been a course of action, but it's not
 9 one that I did take.

10 Q. No, and I've got to suggest to you that you didn't take
 11 it deliberately. You deliberately didn't take that
 12 step.

13 A. No, I don't think I did deliberately not take that step.

14 Q. And you decided for yourself that it didn't matter, and
 15 let the customers believe that the K15 they were buying
 16 was based on a test on a product which was actually the
 17 same, when it wasn't.

18 A. I believe they were getting the same performance from
 19 the product -- from the 2005 product as they were
 20 getting from the 2015 or 2016 product.

21 Q. And that was a belief based on no science, no
 22 independent assessment and no test?

23 A. Just on internal investigations, internal discussions.

24 Q. Internal discussions?

25 A. Correct.

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1 MR MILLETT: Mr Chairman, is that a convenient moment?
 2 SIR MARTIN MOORE-BICK: Yes, I think it is, thank you very
 3 much.

4 Mr Pargeter, we have a short break during each
 5 session, and we'll take one now. We'll come back,
 6 please, at 11.35.

7 I have to ask you, on this occasion, and indeed on
 8 others, when you're out of the room, please don't speak
 9 to anyone about your evidence or anything relating to
 10 it.

11 THE WITNESS: Of course.

12 SIR MARTIN MOORE-BICK: Thank you very much. Would you like
 13 to go with the usher, please.

14 (Pause)

15 Right, 11.35, please.

16 (11.20 am)

17 (A short break)

18 (11.38 am)

19 SIR MARTIN MOORE-BICK: Right, Mr Pargeter, ready to carry
 20 on?

21 THE WITNESS: I am.

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

23 Ready, Mr Millett?

24 MR MILLETT: Thank you, Mr Chairman.

25 Mr Pargeter, I would just like to go to your

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1 recently disclosed notebooks in respect of your
 2 reference to Sisk. Can we go to {KIN00024414}, please.

3 Now, this is an extract from your notebook, and at
 4 the head of the page we can see there is a date of
 5 15 July, which was the date of the next management
 6 meeting in Glossop.

7 Underneath that:

8 •" Consultation responses.
 9 •" First few weeks.
 10 "Ivor.
 11 "- Missed meeting with Sisk + Belway ..."
 12 And then there's other material there.
 13 A little bit lower down that page, you can see:
 14 "- Technical report?
 15 "- 4 page presentation on next steps?
 16 "- reply to Sisk - where is it."

17 Now, my question about that is, first of all: was
 18 Belway the other customer you went to see?

19 A. Yes, it was.

20 Q. It look as if Mr Meredith didn't go to either of those
 21 meetings; is that right?

22 A. That's correct.

23 Q. So did you go on your own?

24 A. I went with Mark Swift.

25 Q. What's the reference to "technical report"?

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1 A. So Ivor would produce a monthly technical report, and he
 2 hadn't been on time with the one at that particular
 3 time, so that's what I was -- it's a question to -- for
 4 Ivor, really, "Where's your technical report?"

5 Q. Was that anything to do with Sisk or Belway?

6 A. No, no, no.

7 Q. And what about the four-page presentation on next steps,
 8 was that about Sisk or Belway?

9 A. No.

10 Q. Then "reply to Sisk - where is it", were you expecting
 11 to send a written reply to Sisk?

12 A. Yeah, I was expecting Ivor to send a written reply.

13 Q. Did you get one from him?

14 A. I don't recall.

15 Q. Did you send one to them?

16 A. I suspect we would have done, because we -- you know,
 17 the issue was resolved eventually.

18 Q. Do you recall whether there was a document to which you
 19 were going to reply, as this note indicates?

20 A. I don't recall.

21 Q. What was the upshot of your meetings with Sisk and
 22 Belway?

23 A. I think whatever their concerns were at the time,
 24 you know, they were resolved at some point in the
 25 future. I don't think there was any follow-up on those.

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1 They were project- specific requests.
 2 Q. Right.
 3 Now, let’s look at your first witness statement and
 4 go, please, to page 14 {KIN00000494/14} at
 5 paragraph 4.17. You say there:
 6 “Prior to the Supply Date, Kingspan had access to
 7 copies of the following desktop studies for rainscreen
 8 cladding systems incorporating K15 which were considered
 9 to be compliant with BR 135.”
 10 Then you set out six desktop studies done in and
 11 after 2014 using K15, don’t you?
 12 A. Yes, that’s correct.
 13 Q. We can see over the page what those are. Those are the
 14 five there. The first one is on the page before.
 15 Would you agree that the 2005 test is referred to in
 16 each of these six desktop reports to which you refer?
 17 A. Yes, I would.
 18 Q. Yes. Let’s look at two together. The first one is the
 19 First Street North. It’s the first of those to which
 20 you refer, 31 July 2014, and you say:
 21 “... this was a report commissioned from Arup by
 22 Carillion and assessed a system incorporating K15 with
 23 either Euro Clad Architectural Alpolic ACM or CEP
 24 [Petrarch] stone rainscreen.”
 25 You referred to the report in the footnote there, at

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1 footnote 16.
 2 Now, let’s look at the report. It’s at
 3 {KIN00010974}. This is the first page of that report.
 4 If we go to page 11 {KIN00010974/11}, we can see that
 5 under section 4.1, K15 is to be the insulation. Do you
 6 see that?
 7 A. Yes.
 8 Q. You can see that in the third box down, “Insulation:
 9 Kingspan Kooltherm K15”, and then it says “See
 10 Section 5.3”.
 11 Then if we move on to page 15 {KIN00010974/15},
 12 under section 5.1, we can see there is a reference to
 13 the BS 8414-1 test from 2005. You can see that in the
 14 first part of the text there on the left -hand side; yes?
 15 A. Yes.
 16 Q. Then if we move on to page 17 {KIN00010974/17} and look
 17 at the second item down on that page, we can see
 18 “Insulation” -- you see it there? -- “100 mm and 80 mm
 19 thick Kingspan K15, compared to 60 mm thick K15 used in
 20 test”, and the test there is the 8414 test in 2005,
 21 wasn’t it?
 22 A. Yes.
 23 Q. The point being made here is that the only difference
 24 between the K15 used in the 2005 test and the K15 to go
 25 into the First Street North system was the increased

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1 thickness.
 2 A. Yes.
 3 Q. Page 18, please, paragraph 5.3.3, and on that page, we
 4 can see there -- I think it’s better to see it in
 5 appendix A on pages 27 and 28, but 5.3 itself refers on
 6 page 19 {KIN00010974/19} to the material, K15. Do you
 7 see that? So under “Properties of insulation material”,
 8 and “Material make-up”, and underneath that, 5.3.2:
 9 “The K15 board has been confirmed as
 10 a Thermoset ...”
 11 Then you have a long description there about how it
 12 would perform in a fire. Do you see that?
 13 Then the 476 tests, parts 6 and 7, on the right -hand
 14 side in the box, just pick that up there.
 15 Then if we look at appendix A, which is referred to
 16 under paragraph 5.3.1, on page 27 and 28
 17 {KIN00010974/27}, we have appendix A:
 18 “Schedule of Kingspan responses to K15 fire
 19 performance queries.”
 20 And A1, if we go to page 28 {KIN00010874/28}, is the
 21 information provided by Kingspan:
 22 “The table below is a duplicate copy of the
 23 information requested from Kingspan in regards to
 24 obtaining further information on the K15 Board
 25 performance in fire. As previously mentioned no

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1 specific test data for the 100mm board has been
 2 provided.”
 3 If you look at the box on the right -hand side of the
 4 page, you can see that the tests are referred to, and
 5 then if you look at the fifth box down, you can see that
 6 there’s a reference to the “BS 8414 test details and
 7 results for 60mm K15. See attached BRE report”. You
 8 see that?
 9 A. Yes.
 10 Q. Nothing there to indicate that the K15 was different
 11 from the K15 tested in that report, is there?
 12 A. Not that I’m aware.
 13 Q. Can you account for why neither Arup nor Carillion
 14 appear to know that the 2005 test was on a different K15
 15 product?
 16 A. Because at the time we were still relying on that test
 17 for its use with the current product.
 18 Q. Indeed. So do you accept that this desktop is actually
 19 worthless because the BS 8414 test was on a different
 20 product?
 21 A. No, I don’t think it is worthless because, like I’ve
 22 mentioned before, the fire performance of the old
 23 technology and the current technology or new technology
 24 is similar, and we’ve also -- we’ve demonstrated that by
 25 a subsequent test on a very similar system, as similar

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1 as we could replicate , with the current product, and
 2 that also passes.
 3 Q. Do you accept that those people who compiled this test
 4 were proceeding on the assumption that the K15 product
 5 tested in the 2005 test was the same as that going into
 6 the North Street building?
 7 A. Yes.
 8 Q. Do you accept -- and you have told us you didn't know
 9 about this difference until 2016 -- knowing what you
 10 know now, that that was misleading, and in fact Kingspan
 11 knew very well that it was selling Kingspan K15 as
 12 a different product from what had been tested in the
 13 2005 test?
 14 A. I don't think it -- as I said before, it's not
 15 a different product. It's essentially the same product.
 16 It's still a phenolic foam which has the same type of
 17 thickness foil coating on it. It's just the process
 18 that was different. So I think, at the time, the belief
 19 was that it was representative of the current product in
 20 terms of its fire performance, particularly in a system
 21 test.
 22 Q. Now, when you made your first statement, in which this
 23 desktop appears as one of six examples -- this is
 24 October 2018, when you made this statement -- you knew
 25 by then that the K15 being sold was different from the

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1 K15 as tested. Why, given that knowledge at the time of
 2 that statement, did you identify this desktop, but not
 3 qualify it by telling the Inquiry that Arup and
 4 Carillion had proceeded on a misapprehension as to
 5 precisely what the product was that was going on to
 6 First Street?
 7 A. It hadn't crossed my mind to do so.
 8 Q. I can't quite understand why it hadn't crossed your mind
 9 to do so, given that you had been told two years
 10 previous that it was a different product.
 11 A. Like I say, it isn't a different product, it's
 12 a different process. So my belief is that it's the
 13 same -- essentially the same product, just manufactured
 14 in a different process.
 15 Q. I was going to ask you questions about one or two of
 16 these others.
 17 Do you accept also that in fact these desktops also
 18 proceed upon a fundamental misassumption as to precisely
 19 what K15 was?
 20 A. The reports don't tell you the difference between the
 21 processing of the product, no. They just reference its
 22 performance in that particular test, system test, that's
 23 all.
 24 Q. Right. Now, we've seen --
 25 SIR MARTIN MOORE-BICK: Sorry, could you just help me. Give

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1 me a moment.
 2 Were you aware that there had been a change in the
 3 nature of the foil facer round about 2006?
 4 A. No. As far as I'm aware, the foil facer thickness has
 5 remained the same from the 2005 test, which was,
 6 I believe, a 25-micron.
 7 SIR MARTIN MOORE-BICK: But they introduced perforations,
 8 didn't they, in connection with --
 9 A. With the introduction of the new technology?
 10 SIR MARTIN MOORE-BICK: Yes.
 11 A. Yes, I believe so.
 12 SIR MARTIN MOORE-BICK: Did you consider whether the
 13 introduction of perforations might affect the
 14 performance in fire?
 15 A. I don't believe the introduction of perforations had any
 16 effect on the fire performance of the product in
 17 a large-scale system test.
 18 SIR MARTIN MOORE-BICK: What was the basis for that
 19 understanding?
 20 A. I believe that now, and I probably would have believed
 21 that from when I started to understand exactly how that
 22 test performs and what the requirements of that test
 23 are.
 24 SIR MARTIN MOORE-BICK: All right. Thank you.
 25 MR MILLETT: Those desktop assessments were not withdrawn in

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1 2019, were they?
 2 A. Not as far as I'm aware, no.
 3 Q. Even though, in March 2019, Kingspan had decided to
 4 withdraw the test from its website?
 5 A. That's correct.
 6 Q. Can you explain why, having made that decision, Kingspan
 7 did not write to each of the contractors or architects
 8 who had produced these desktop reports in reliance on
 9 the BS 8414-1 test from 2005 and tell them that you had
 10 withdrawn that test from your website and why?
 11 A. Yes, because what we wanted to do was to understand
 12 exactly what the implication might be of the
 13 differences, if any, in the performance of those
 14 products. So we undertook a test programme, as
 15 I mentioned, just to try and replicate it so that when
 16 we did go back to the fire engineers with that evidence,
 17 we'd got replication, if you like, test evidence on the
 18 current product or the new technology for them to make
 19 a judgement on whether the -- any assessments or
 20 judgements that were made in the past would still hold
 21 or whether they felt they were compromised enough to
 22 withdraw them.
 23 Q. What was the purpose of withdrawing the test report from
 24 your website on the one hand, but leaving these building
 25 owners, who owned these six buildings, in the dark about

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1 precisely the basis on which it had been safe to apply
 2 K15?
 3 A. I think to remove it from the website was just to ensure
 4 that any further assessments don't rely on that evidence
 5 anymore, and obviously to -- in order for them to
 6 understand -- the fire engineers and the building owners
 7 to understand the implication of the differences, we
 8 needed to provide some, you know, test evidence to
 9 support that.
 10 Q. So let me just piece that together a little bit.
 11 You withdrew the test report from the website
 12 because you knew it was no longer reliable; yes? That's
 13 what you just said. I want to make sure I've understood
 14 it correctly.
 15 A. Just so that people couldn't rely on it going forward.
 16 Q. Exactly, and that's because you thought that it was no
 17 longer reliable going forward; yes?
 18 A. Correct.
 19 Q. But on the other hand, you didn't tell the owners of the
 20 six buildings in respect of which desktop studies had
 21 been done that the desktop reports that they had relied
 22 on safely to put K15 above 18 metres were also no longer
 23 reliable.
 24 A. Well, first --
 25 Q. Can you explain why you were prepared to withdraw the

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1 tests but not tell the building owners exactly why it
 2 was?
 3 A. I think because there was still -- there's a belief that
 4 the reports are still reliable because of the belief
 5 that the product performance isn't that different, if
 6 different at all, but that belief needed to have some
 7 basis of evidence.
 8 So, you know, if we'd have just withdrawn the
 9 reports and said, "We think it's the same", would that
 10 have been enough -- and these reports on these buildings
 11 are already in existence, they're already there, so the
 12 next action was to move forward and do some testing to
 13 satisfy ourselves that that statement, that there is no
 14 implication, can be stood behind, or if it proved that
 15 there was, then, you know, it's a different conversation
 16 with the fire engineers.
 17 Q. Why not simply write to these building owners and tell
 18 them in the interim that these reports are not reliable,
 19 that you are doing a re-testing programme, and that they
 20 ought to know that in the interim and you'll report back
 21 to them as soon as you could once you had the results?
 22 A. I think we could have done, but I don't know what
 23 benefit that would have done without any back-up
 24 evidence.
 25 Q. Well, I suppose -- let me put it to you -- it would have

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1 informed the building owners that the basis on which
 2 they had applied K15 at the date or after the date of
 3 these desktop reports was potentially erroneous,
 4 wouldn't it?
 5 A. But that could have been a false potential.
 6 Q. Why didn't you trust them to make their own minds up
 7 about that?
 8 A. Because they can't make their minds up without any test
 9 evidence. They needed test evidence to know whether
 10 that assumption is correct.
 11 Q. When Kingspan removed the 2005 test from its website,
 12 did Kingspan, either on the website or elsewhere, offer
 13 any reasons for doing so, or did the test report simply
 14 disappear one day?
 15 A. We just took them off, just so that they couldn't be
 16 referenced any further.
 17 Q. I'm taking it from the exchange we've just had about the
 18 desktops that you didn't thereafter contact any building
 19 owners who owned buildings on which you had known that
 20 K15 had been applied and tell them that they were
 21 working on the basis of a misassumption as to what had
 22 been tested in 2005?
 23 A. No, not until recently.
 24 Q. When you say recently, you mean 23 October 2020?
 25 A. Correct.

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1 Q. So when you referred to these six desktops in your 2018
 2 statement, you didn't reveal to the Inquiry that you had
 3 known for some two years that the K15 that is referred
 4 to in those tests as having passed those tests was not
 5 the same as the K15 that was used on those buildings?
 6 Clearly you didn't do that. Why is that?
 7 A. Sorry, what was the question? When was this evidence
 8 provided, in my second witness statement?
 9 Q. Your first witness statement.
 10 I'll rephrase the question: why, when you did your
 11 first witness statement and referred to these six
 12 desktops in October 2018, did you not reveal that you
 13 had known for some two years by then that the K15
 14 referred to in these desktops was different from the K15
 15 that had been tested?
 16 A. I think we just wanted to be sure of the facts, when did
 17 the -- exactly when did the technology change and what
 18 were the implications.
 19 Q. What was it that you didn't know in October 2018 when
 20 you did your statement that you knew in March 2019 which
 21 led you to withdraw the test reports?
 22 A. I think personally, you know, I didn't -- I've said it
 23 before that, you know, I wasn't aware that there was any
 24 difference in fire performance, and so that's why
 25 I didn't consider it again.

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1 Q. Was any external organisation -- NHBC, BRE, BBA, LABC --
 2 told that the K15 as tested in 2005 was different from
 3 K15 as applied from 2006?
 4 A. No, not at the time. What we did do was contact the BBA
 5 and ask them to be removed from the certificate, and
 6 also LABC, they were removed from their certification as
 7 well. I think by April 2019 the LABC certificate was
 8 amended, and we started the process with the BRE at
 9 around the same time -- sorry, BBA, not the BRE. I'm
 10 looking at the report.
 11 Q. You see, by this point, 2019, the Grenfell Tower fire
 12 was already some 20 months before that. Did it not
 13 occur to you, particularly given what we had seen with
 14 the Grenfell Tower fire and the external fire spread,
 15 that leaving out there K15 on buildings with building
 16 owners thinking that it had safely passed a 2005
 17 8414 test was dangerous?
 18 A. No, I don't believe it is dangerous. I believe the
 19 performances are the same, the same material, so it's
 20 more of a technicality over what exactly was tested
 21 rather than a difference in performance to give
 22 a concern over safety.
 23 Q. Did it not occur to you that it was a matter of the
 24 gravest urgency, if you were going to take that view, to
 25 verify it with the most robust science possible?

1 A. Yes, and that's why we undertook the testing programme
 2 that we did.
 3 Q. And to do so as a matter of the extremest urgency?
 4 A. Yes, and I think we did it in fairly quick time as well.
 5 Q. How can you account for the fact that about 18 months
 6 then passed between withdrawing the test from the
 7 website in March 2019 and withdrawing the test and the
 8 classification report only in October 2020, a matter of
 9 weeks ago?
 10 A. Because we undertook a series of tests, including
 11 an 8414, which they take time to arrange and do, we had
 12 to investigate it, and then we'd got the reports back
 13 which we could use to contact fire engineers which would
 14 be useful for them I think in around February of 2020.
 15 Q. We're going to come back to what happens in 2020 just
 16 shortly.
 17 I just want to ask you about how you first became
 18 aware of the fact that the 2005 test used a different
 19 K15 product from the product sold to the public from
 20 2006.
 21 Can we look at your third witness statement, please,
 22 which is 18 September 2020, this year, at page 52
 23 {KIN00022610/52} and look at paragraph 7.2. Here we
 24 have the question:
 25 "How did this information come to your knowledge?"

1 Your answer is:
 2 "In 2016, Gwyn Davies (Director of Processing)
 3 flagged the issue to me as part of our discussions
 4 around trying to replicate the 2005 BS 8414 Test for the
 5 testing of K115, as explained in paragraph 7.9 below.
 6 I was not concerned about the issue at this time and did
 7 not investigate it further given that Insulation UK had
 8 been relying on the test for years and I was not aware
 9 of any indication that the change had any impact on the
 10 product's fire performance. The issue was then drawn to
 11 my attention in 2018 by Insulation UK's solicitors who
 12 have been advising Insulation UK in relation to the
 13 Grenfell Tower Inquiry."
 14 Just looking at the first part of that sentence,
 15 what exactly did Gwyn Davies flag to you at the time?
 16 A. So we were doing a second iteration of the low lambda
 17 development of the product, which is phrased there as
 18 K115, and we wanted to -- we'd asked the BRE how we
 19 could assess the performance of K115 against all the
 20 other test evidence that we'd got in the armoury at the
 21 time, and they'd suggested that the 2005 test would be
 22 a good one to compare to. So we'd done that, we'd built
 23 a system as close as we could with the materials that
 24 were now currently available, and the K115 didn't get
 25 the same result.

1 So I enquired to Gwyn as: could there be any
 2 difference between the products that are missing -- it's
 3 mostly I think system differences, and that was where
 4 Gwyn then came back and said, "Well, in 2005, that could
 5 well have been old technology, but you wouldn't be
 6 seeing a difference in fire performance, it was just
 7 a different process".
 8 Q. And that was the first time, was it, that you had heard
 9 reference to old technology?
 10 A. No, "old technology" was, you know, a phrase used in the
 11 business commonly, I would say.
 12 Q. I see. This was therefore the first time that you had
 13 found out that K15 was old technology; is that right?
 14 A. Well, the whole phenolic range changed from, I believe,
 15 old tech to new tech.
 16 Q. Right. So you had discovered, I think, that there had
 17 been a full-scale fire test in 2005, I think you told us
 18 earlier, in November 2014 when you took over your
 19 marketing role.
 20 A. That's correct, yes.
 21 Q. So you knew there had been a full-scale test at that
 22 point.
 23 Given that you knew that, as you have just told us,
 24 the whole phenolic range changed from old tech to
 25 new tech, did it not occur to you at that stage,

1 November 2014, that in fact the K15 being sold was
 2 new tech not old tech?
 3 A. I would have assumed it was new tech, yes, because it
 4 was current production.
 5 Q. Given that it was common knowledge that there had been
 6 this change, was it common knowledge that the change had
 7 happened in 2006?
 8 A. No, no.
 9 Q. What was the date?
 10 A. I didn't have a date in mind. It was just it had
 11 happened, you know, years ago.
 12 Q. Given that it had happened years ago, you must have
 13 realised at some point, when you realised that the test
 14 had been done in 2005, that the test had been done on
 15 old tech, or did you think then that the test had been
 16 done on new tech?
 17 A. It could have been done on new tech, I didn't know --
 18 Q. Did you not explore that?
 19 A. -- know the date -- no, not until we were doing this
 20 re-testing.
 21 Q. Right.
 22 You were asked, I think, by the Inquiry about the
 23 source of the information that you set out here, and you
 24 answered that in your third witness statement in
 25 September this year at page 53 {KIN00022610/53}, the

1 next page.
 2 I have misled you by that question, I'm afraid;
 3 in fact, you elaborate on what you have said rather than
 4 answering a further question.
 5 What you say here is:
 6 "This information is not contained in specific
 7 documents. See my answer to question b above: the
 8 information came to my attention as part of the process
 9 of the document review and disclosure exercise
 10 undertaken to assist the Grenfell Tower Inquiry. See
 11 also the spreadsheet prepared to assist the Inquiry ...
 12 which sets out all of the changes made in the production
 13 of K15 which confirms this change at row 7."
 14 You say the same thing at paragraph 10.30 of your
 15 second witness statement {KIN00020824/94}.
 16 So I just want you to be clear, if you can,
 17 Mr Pargeter, with me: did your awareness about the 2005
 18 test using old technology K15 come about as a result of
 19 it coming to your attention as part of the process of
 20 the document review and disclosure exercise for
 21 the Inquiry, as you say in paragraph 7.3?
 22 A. No, I think the fact that it was old technology was
 23 probably when -- the discussion I had with Gwyn Davies
 24 in 2016.
 25 Q. Right. Well, what was it that came to your attention as

1 part of the document review --
 2 A. Just exactly when the change occurred.
 3 Q. Right.
 4 A. So it was -- I think it was September 2006, I think is
 5 the date that it's recorded as changing from old tech to
 6 new tech.
 7 Q. Right, I see.
 8 So just to unpick this a little bit, you learnt
 9 about the fact that the K15 tested was different from
 10 Mr Davies in 2016, but you only found out about the date
 11 of the change as a result of reviewing documents to
 12 assist this Inquiry; have I got that right?
 13 A. That's correct, yeah.
 14 Q. I follow.
 15 Now, you say in this sentence:
 16 "This information is not contained in specific
 17 documents. See my answer to question b above: the
 18 information came to my attention as part of the process
 19 of the document review and disclosure exercise
 20 undertaken to assist the Grenfell Tower Inquiry."
 21 What documents exactly do you recall demonstrated to
 22 you that the change from old to new technology occurred
 23 in 2006?
 24 A. So I didn't do the review itself in terms of the detail,
 25 that was done by Gwyn and the -- and his team, and so it

1 would have been his research into, I'd imagine, old
 2 tech lam meeting minutes which then compiled into that
 3 Kingspan document we've attached there.
 4 Q. You say in this sentence:
 5 "This information is not contained in specific
 6 documents ... the information came to my attention as
 7 part of the process of the document review and
 8 disclosure exercise ..."
 9 If the information isn't contained in specific
 10 documents, how could it come to your attention as part
 11 of the document review process and disclosure exercise
 12 undertaken to assist the Inquiry?
 13 A. Well, I think the document reviewing is just a phrase,
 14 and it was just, you know, the investigations that were
 15 done with what evidence we could find back in that
 16 historical period.
 17 Q. Well, was it documents or wasn't it documents?
 18 A. Well, there must have been some documents which linked
 19 to this change, but it was just compiled and collated
 20 into this one.
 21 Q. When you spoke to Mr Davies about this when he flagged
 22 the issue to you in 2016, did he show you any documents
 23 or invite you to look yourself at any documents?
 24 A. No.
 25 Q. Did you ask for any?

1 A. No.
 2 Q. Did it not shock you or surprise you to learn that the
 3 Kingspan K15 that was being sold by Kingspan at that
 4 point was not the same as had been tested, or may not
 5 have been the same as tested, in 2005?
 6 A. It didn't, no, because, you know, products progress and
 7 change through their history, so I would have just
 8 expected that that change had been controlled and ...
 9 through that period of time. I wouldn't have looked
 10 back any further.
 11 Q. Well, with great respect, that doesn't make a lot of
 12 sense.
 13 Did you ask him whether there had been a recent test
 14 so that people buying K15 and putting it on their
 15 buildings were doing so on the basis of an 8414 test of
 16 what was going onto the building?
 17 A. In 2016 there had been several recent tests by then
 18 anyway, so I knew the current product had been tested to
 19 8414 in different system tests.
 20 Q. That's not quite an answer to my question, you see.
 21 What you're told by Mr Davies -- and I'm summarising it,
 22 and tell me if this is an inaccurate summary -- is that
 23 what is being sold by Kingspan at that time, 2016, was
 24 not what had been tested under the 2005 8414 test.
 25 So did it not surprise you to learn that the product

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1 being bought by people was not the same product as had
 2 undergone a fire safety test 11 years previous?
 3 A. No, I don't think it did.
 4 Q. Why is that?
 5 A. Because there was an understanding that there wasn't
 6 a difference in the product. Although it was
 7 a different technology, it was a different processing
 8 methodology, the product itself essentially is the same
 9 product.
 10 Q. We have been round this a number of times.
 11 When you first heard about it, was it Mr Davies who
 12 said to you, "Well, there has been this change but don't
 13 worry about it", or did you come to the conclusion that
 14 you really shouldn't worry about it or do anything about
 15 it after further discussions and investigation?
 16 A. I think, after my discussions with Gwyn, I thought
 17 I don't need to do anything further with that.
 18 Q. So does it come to this -- I'm just trying to piece this
 19 conversation together in my head, as it were, in real
 20 time -- he tells you that what's being sold is
 21 different; at that moment, did it not occur to you that
 22 that was something irregular or surprising, before we
 23 come on to the explanation? Was the news not a shock to
 24 you?
 25 A. I don't think it was. I don't recall exactly, but

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1 I don't think it was.
 2 Q. Then how did the conversation go after that?
 3 A. It was just about, well, what was the difference, and he
 4 explained that it was, like I say, a different process,
 5 and we can process it faster, and I was concerned about
 6 then how do we move the K115 project forward, is there
 7 a problem now with the K115 material that we're looking
 8 at, is that not performing in the same manner as the
 9 current production.
 10 Q. Gwyn Davies, is he a fire engineer?
 11 A. No, chemist.
 12 Q. Does he have any fire safety qualifications?
 13 A. Not that I'm aware of.
 14 Q. Did you have a discussion about what the fire safety
 15 implications of the change in process might be?
 16 A. Only that the product performance in the sort of
 17 small-scale testing that we would do was -- it was
 18 a Euroclass C then and it's a Euroclass C now. So in
 19 that respect, the chemistry tells them that there's no
 20 significant difference, and then that Euroclass tells
 21 them there's not a significant difference.
 22 Q. Let's just examine that a bit further.
 23 Go back a page, please, in this third witness
 24 statement to paragraph 7.2 {KIN00022610/52}. You say
 25 there -- and this is where we see the discussion you're

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1 referring to with Gwyn Davies in 2016 -- in the first
 2 sentence, I have read this to you before:
 3 "In 2016, Gwyn Davies (Director of Processing)
 4 flagged the issue to me as part of our discussions
 5 around trying to replicate the 2005 BS 8414 Test for the
 6 testing of K115, as explained in paragraph 7.9 below.
 7 I was not concerned about the issue at this time and did
 8 not investigate it further given that Insulation UK had
 9 been relying on the test for years and I was not aware
 10 of any indication that the change had any impact on the
 11 product's fire performance."
 12 You go on to say that the issue was then drawn again
 13 to your attention in 2018.
 14 Now, looking at your reasons there, you cite the
 15 fact first that the 2005 test had been relied on by
 16 Kingspan for years. Was that not in fact all the more
 17 reason to do something urgently about what you had just
 18 learnt from Mr Davies, namely actually quickly to get to
 19 the bottom of --
 20 A. No, I think if he'd have indicated to me that there was
 21 a big difference in fire performance, let's say it used
 22 to be an E on the Euroclass or a B and now we're a C,
 23 then that may have caused more of a question for me to
 24 investigate.
 25 Q. But you also cite the fact that you were not aware of

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1 any indication that the change had any impact on the
 2 product's fire performance, but you don't say here that
 3 you actually positively investigated that question, do
 4 you?
 5 A. Well, I mean, positively investigated it to the point of
 6 having the discussion with Gwyn, no, I didn't go beyond
 7 that.
 8 Q. But you don't say here, "I was not aware of any
 9 indication that the change had any impact because of
 10 what Gwyn Davies told me", do you?
 11 A. No.
 12 Q. You don't refer to a discussion with Gwyn Davies about
 13 the technical fire safety implications of the change in
 14 the manufacturing process here in your statement, do
 15 you?
 16 A. No.
 17 Q. Why is that?
 18 A. I think because I'm just really answering the question
 19 there, "How did this information come to your
 20 knowledge?", and that is how the information came to my
 21 knowledge.
 22 Q. Now, you had been head of technical as well as marketing
 23 since May 2015, so some 18 months or so, perhaps
 24 a little less. Did you not even think as head of
 25 technical to instigate a technical investigation into

1 the actual changes in technology or process that had
 2 occurred some years, many years, before in order to
 3 decide what to do next?
 4 A. No, I didn't.
 5 Q. Why is that?
 6 A. Because I was just moving forward with the testing of
 7 the current product and of any new replacement lower
 8 lambda version. I didn't think to look back.
 9 Q. You didn't think to look back? For someone with, with
 10 great respect, a first-class science degree in design
 11 and innovation, surely the fact that a different version
 12 of the phenolic foam had been used raised questions in
 13 your mind about the potential differences in fire
 14 performance?
 15 A. And those questions were allayed with the discussions
 16 with Gwyn, and that's why I didn't take it any further.
 17 Q. Would you agree that any number of things could affect
 18 fire performance, such as changes to chemical
 19 composition, changes to the facer thickness, changes to
 20 the perforations, whether there were any, or use of
 21 adhesives, things like that? Any of those could affect
 22 fire performance, couldn't they?
 23 A. They could, and most of those affected small-scale fire
 24 performance, if you like, rather than the large-scale.
 25 Q. Did you investigate whether any of those particular

1 differences between old and new technology existed?
 2 A. No, I didn't.
 3 Q. Why is that?
 4 A. It didn't occur to me.
 5 Q. Now, as I say, you were head of technical; did you
 6 report what Gwyn Davies had told you about the change in
 7 technology and the fact that K15 may have been the old
 8 technology to anybody else? Did you discuss it? Did
 9 you seek a discussion with anybody on the main board?
 10 A. No, I don't think I did.
 11 Q. What was it that changed between the discovery in 2016,
 12 as you have discussed, from Mr Davies, and
 13 23 October 2020, when you wrote to various
 14 fire engineers, including the BRE, and to the Inquiry to
 15 acknowledge that the test relied on in 2005 was not
 16 in fact carried out on the K15 which had been sold since
 17 2006? What had changed?
 18 A. I think we were looking at it under a much different
 19 light, obviously much more focus on it, and I think just
 20 the opinion then was it would be prudent to withdraw it
 21 at this stage.
 22 Q. Well, okay, you say looking at it under a much different
 23 light; what made the light different?
 24 A. Obviously under the deep investigation we'd done as part
 25 of the Inquiry, we'd looked at a lot of different

1 issues, and that was one that we thought probably should
 2 have been dealt with at the time differently and
 3 shouldn't have been relied on going forward, but there's
 4 no thought about the difference in fire performance
 5 between the two technologies.
 6 Q. So the only difference between 2016 and 2020, between
 7 your 2016 conversation with Mr Davies and the withdrawal
 8 of the tests in October this year, was the degree of
 9 scrutiny being applied to the question by the Inquiry?
 10 A. I think potentially, yes.
 11 Q. You say potentially.
 12 A. Yes.
 13 Q. What else is there?
 14 A. Well, that's correct.
 15 Q. You mean actually?
 16 A. Yes.
 17 Q. Yes.
 18 A. Yes.
 19 Q. And there was no technical discovery or anything else
 20 that led you to think that any assumptions that you had
 21 made were wrong?
 22 A. No, there's no technical discovery.
 23 Q. No, thank you.
 24 Just going back to this discovery about old tech and
 25 new tech, is it the case that, until the discussion that

1 you had had in 2016, you had never seen any reference to
 2 Kesteren technology or new technology K15 within the
 3 business?
 4 A. Like I said, it was common knowledge of the change in
 5 technology, and "Kesteren" was a phrase used.
 6 I wouldn't have understood what that meant up until we
 7 started to do the work for the Inquiry. So it was
 8 a common knowledge.
 9 Q. When you became head of technical in May 2015, did you
 10 never take it upon yourself to study or at least look
 11 over the large-scale fire testing that had been
 12 conducted by Kingspan on K15?
 13 A. No. Not into detail, no.
 14 Q. Were you not told about the issues with fire performance
 15 with new technology K15 that had occurred in 2007 or
 16 2008?
 17 A. I was -- at some point I was made aware of -- I think
 18 the Sotech testing was something that was mentioned,
 19 I think Ivor may have mentioned that, with aluminium
 20 systems.
 21 Q. Yes.
 22 A. I knew there was some system testing --
 23 Q. When did you come across that?
 24 A. -- which was historical. I think it probably would have
 25 been just a few months after taking over the role.

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1 Q. Right.
 2 I'm sorry, I interrupted your answer with my next
 3 question. Did you want to finish off your answer about
 4 the aluminium systems?
 5 A. No, I'd finished.
 6 Q. Right.
 7 Did you not come across reports in relation to the
 8 increased heat output or quicker times to ignition and
 9 continued burning that occurred during tests such as the
 10 Sotech that you have referred to?
 11 A. No, I didn't.
 12 Q. You say that it would have been a few months after
 13 taking over the role that you discovered that K15 burnt
 14 in the way that it did in relation to the Sotech test;
 15 is that right?
 16 A. No, I'd discovered that there had been system tests done
 17 with Sotech that hadn't passed.
 18 Q. That hadn't passed?
 19 A. Yes.
 20 Q. How did you discover that?
 21 A. I'd imagine -- I can't remember exactly -- it would have
 22 been discussions with Ivor and potentially with Tony as
 23 well, but ...
 24 Q. Would Ivor have told you -- do you remember being told
 25 that the result of the Sotech result was not just a fail

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1 but a spectacular fail?
 2 A. No.
 3 Q. Did he not ever use the expression "raging inferno" to
 4 you?
 5 A. No.
 6 Q. When you became product development manager in late
 7 2013/early 2014, as we discussed, and were given the job
 8 of developing the new lower lambda K15, or K115, as
 9 I think it's been named, didn't you sit down with
 10 Ivor Meredith and go through the fire testing that had
 11 been undertaken on K15?
 12 A. No, I didn't.
 13 Q. What about with Tony Millichap?
 14 A. No.
 15 Q. How would you be able to develop or further the
 16 development of K115 without doing that?
 17 A. Because at the time when I took over, I don't think
 18 I would have even understood what an 8414 test was, so
 19 I just knew there were a series of fire tests required
 20 to introduce a new product against a product standard
 21 for one, and they would have been small-scale fire tests
 22 as well as a large-scale fire test if you wanted to use
 23 it above 18 metres, but I wouldn't have understood
 24 exactly what it was. But, like I say, I didn't need to
 25 as product development manager. It was just -- that was

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1 part of the requirement of each of the departments, to
 2 achieve the testing to be done. And that testing had
 3 already been done, actually, by the time I took over
 4 that project. The large-scale was, and then they were
 5 continuing with the production trials, and then the
 6 testing that's required as part of the product standard,
 7 which would be your SBI, single burning item testing.
 8 Q. Is it really right that when you took over as product
 9 development manager in late 2013/early 2014, the K115
 10 large-scale test had been done? Is that right?
 11 A. Well, there's two lower lambda developments. There's
 12 one which was just called lower lambda, so it was K15LL,
 13 if you like, as a terminology, and that was the earlier
 14 development which we're talking about now. The K115 was
 15 slightly later. It was in 2016.
 16 Q. Right.
 17 A. But it was based on the same premise. It was still
 18 based on using a solstice-blown system to get our lower
 19 lambda version. So we'd stopped the project in 2014/15,
 20 and restarted it again on K15 in 2016.
 21 Q. When you came into the project, you were looking at the
 22 lower lambda as opposed to the K115; is that what you
 23 were --
 24 A. Yes.
 25 Q. I see. But wouldn't it have been required reading, in

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1 order to develop the lower lambda project further, to
 2 look back and see what the K15 tests were?
 3 A. Not for me, no, I didn't think.
 4 Q. Right, not for you. What about to get a brief on them
 5 so that you could understand what the previous test was
 6 and what the lower lambda product being developed would
 7 have to go through?
 8 A. Sorry, say that again, sorry?
 9 Q. Let me try it a different way.
 10 What test would be applied to the lower lambda
 11 product to make it safe for use above 18 metres?
 12 A. Yeah, so as I understand it, it would be the BS 8414
 13 test, yes.
 14 Q. It would be a BS 8414 test, yes. And did you not want
 15 to know how K15 had fared in any previous 8414 test so
 16 that that would inform your knowledge about how lower
 17 lambda might fare or what you had to do in order to set
 18 up such a test?
 19 A. No. Like I say, the test for the lower lambda one had
 20 already been done. So, for me, it was a number rather
 21 than -- I'd no concept of the size of the test or what
 22 was involved in it, it was a number, and that test had
 23 already been carried out. So it was almost a tick in
 24 the box for the lower lambda development.
 25 Q. When that discussion occurred about the lower lambda

1 test, was there any mention at that stage about old and
 2 new technology K15?
 3 A. Not that I recall.
 4 Q. Because that would have been long before 2016, wouldn't
 5 it?
 6 A. That would have been, yeah, 2014 time.
 7 Q. Yes.
 8 Now, I want to ask you some questions about the
 9 cladding used in the 2005 test.
 10 Now, can we start by going to your first statement,
 11 please, at page 12 {KIN0000494/12}, and I would like to
 12 go in that to paragraph 4.13(a). I've read this to you
 13 before. You refer there to a UAC manufactured cement
 14 particle board rainscreen fixed to an aluminium railing
 15 system. You see that?
 16 In your second statement, let's look at that, at
 17 page 100 {KIN00020824/100}, you say at paragraph 10.55
 18 at the top of the page:
 19 "Although I was not involved in the 2005 BS 8414
 20 Test, I did become aware during the development testing
 21 of K115 (a second project looking to improve thermal
 22 performance of the product) that the cladding in the
 23 test report may not have been correctly reported."
 24 Then you go on, if you look a little bit lower down
 25 that page, to say this, paragraph 10.57:

1 "The test report for the 2005 BS 8414 Test refers to
 2 a 6mm UAC cement particle board being used as the
 3 external cladding element of the system tested. This
 4 would be unusual and would not be representative of an
 5 external cladding element because such material is not
 6 designed for an external application and may be subject
 7 to degradation upon weathering. However, having
 8 investigated the issue further, Kingspan is of the
 9 belief that the test report incorrectly references the
 10 type of cladding used and that the cladding actually
 11 used in the external cladding system tested in 2005 was
 12 a fibre cement board (non-combustible) (as opposed to
 13 cement particle board which is generally rated as
 14 Euroclass B), which would be more representative of an
 15 external cladding system used in practice at that time.
 16 But I think it likely that the fibre cement board was
 17 chosen to simply replicate a non-combustible façade
 18 element as representative of the cladding used at the
 19 time."
 20 I've read all that out to you so that everyone can
 21 see what you say.
 22 That statement there led to some questions from
 23 the Inquiry, as a result of which you produced your
 24 third statement, or part of it.
 25 Can we go to page 54 in that document

1 {KIN00022610/54}, paragraph 7.10, at the bottom of
 2 page 54. You were asked the question:
 3 "On what do you base your view that a fibre cement
 4 board would be more representative of an external
 5 cladding system used in practice at the time?"
 6 Your answer at 7.10 is this:
 7 "Cement particle board is not typically a product
 8 that is used in external rainscreen façade systems,
 9 whereas fibre cement board is. Adrian Brazier also
 10 undertook a desktop analysis of cladding products and
 11 this is the basis of my understanding."
 12 Now, cement particle board is a building board,
 13 isn't it?
 14 A. Yes, I believe so.
 15 Q. If we go over to page 55 {KIN00022610/55} at
 16 paragraph 7.12, we can see what you say about your
 17 investigations. You say:
 18 "Adam Heath reviewed delivery notes to confirm what
 19 products had been delivered to Insulation UK for the
 20 2005 BS 8414 Test."
 21 Then you go on to say in the last part of that
 22 paragraph:
 23 "I believe that Adrian Brazier also carried out a
 24 desktop analysis which identified that fibre cement
 25 board was more representative of products used in

1 external cladding systems. I do not recall his findings
 2 being recorded in writing."
 3 Now, I have led you all through that.
 4 How did Adrian Brazier impart the knowledge of this
 5 desktop analysis to you?
 6 A. Just in discussions.
 7 Q. Right. So no writing, no document, no email, no report?
 8 A. I don't recall any, no.
 9 Q. Right. When did he tell you that?
 10 A. Oh, it would have been at the time we were looking at
 11 that test again in 2016, because we were looking to
 12 replicate the test for the K115 project, so we wanted to
 13 see if we could get exactly the same or as close to the
 14 original items tested.
 15 Q. When you say he carried out a desktop analysis, do you
 16 mean that he didn't write anything down but he did it in
 17 his head?
 18 A. No, he searched the internet to see what was currently
 19 available in terms of product descriptions and --
 20 because I don't think -- you know, I certainly wasn't
 21 aware of what the difference between a cement particle
 22 board and a fibre cement board was.
 23 Q. Right.
 24 A. And so -- and I don't think Adrian did either, so Adrian
 25 said he'd have a look and came back and said, yeah, it

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1 looks like a cement particle board is more like
 2 something we'd put on the inside of a system and a fibre
 3 cement board is more likely to be used on the outside.
 4 Q. I see. So when you refer to a desktop analysis, you're
 5 not actually referring to a written analysis --
 6 A. No, a review --
 7 Q. -- you're referring to a scamper through the internet to
 8 see what's out there?
 9 A. A review.
 10 Q. I see. Did you make any notes of the so-called analysis
 11 that he had undertaken and the products to which it
 12 related?
 13 A. Not that I recall.
 14 Q. Is Adrian Brazier a fire engineer?
 15 A. No, he's not.
 16 Q. So all he did, was it, was just look on the internet and
 17 see what people used as cladding?
 18 A. Yeah, what the suppliers were putting forward as cement
 19 board cladding products.
 20 Q. That would have been in, when, 2016, do you say?
 21 A. Yes.
 22 Q. That wouldn't have been a retrospective analysis of the
 23 market as it stood in 2005, would it?
 24 A. No, no, it was what was available at that time.
 25 Q. No. So when you refer to the desktop analysis which

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1 identified that fibre cement board was more
 2 representative of products used in external cladding
 3 systems, that's more representative in 2016 but not
 4 2005?
 5 A. Correct.
 6 Q. Can we look at the statement of Adam Heath. This is at
 7 {KIN00008834/96}. He is the individual that you refer
 8 to as having written to UAC to ask them if they
 9 manufactured cement particle board in the paragraph
 10 we've just looked at.
 11 If we go to page 96 in his statement to the Inquiry,
 12 paragraph 11.53, he says in the penultimate sentence of
 13 that paragraph -- I'm afraid it's rather a long chunk of
 14 text -- third line from the bottom:
 15 "Based on this understanding that the 2005 BS 8414
 16 Test used fibre cement boards, my view is that these
 17 boards were used as the cladding element of the tested
 18 system. I do not believe that these boards are intended
 19 for use as rainscreen cladding and I am not aware of any
 20 buildings on which these boards have been used for this
 21 purpose. I am aware that there are now fibre cement
 22 cladding materials available on the market for use as
 23 rainscreen cladding."
 24 Now, from that it appears that Adam Heath, at the
 25 time he wrote this statement, was of the opinion that

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1 fibre cement board was not a typical cladding material
 2 at the time of the test.
 3 Were you not aware also of his view when you signed
 4 your second and third witness statements?
 5 A. Erm ... at the time it wasn't, in 2005? I probably
 6 would have thought it had never been.
 7 Q. Well, Adam Heath is saying that he was of the view that
 8 fibre cement board was not a typical cladding material
 9 at the time of the test. Were you not aware that that
 10 was his view when you made your second or third witness
 11 statements?
 12 A. No, I probably would have shared that view.
 13 Q. Right. So what was the point, then, of referring to
 14 your opinion that it would have been a fibre cement
 15 board because that was more representative, when in fact
 16 at the time of the test Adam Heath was thinking the
 17 exact opposite?
 18 A. I'm a bit confused by the question. Fibre cement is
 19 a board that is typically used, yes, and was at the
 20 time. Fibre cement. Cement particle board wasn't at
 21 2016, wasn't at 2005.
 22 Q. No, we may be at cross-purposes. My question really is
 23 why you thought that it would have been more likely that
 24 the BS 8414 test in 2005 used cement particle board as
 25 opposed --

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1 A. I didn't.
 2 Q. Sorry, fibre particle board as opposed to cement
 3 particle board, when in fact Adam Heath's view is that
 4 fibre cement particle board would not at that time have
 5 been representative?
 6 A. I don't think that's correct. I don't think he has that
 7 belief. I think he -- I believe that fibre cement is
 8 more likely to have been a cladding material at the time
 9 than a cement particle board.
 10 Q. Well, he says:
 11 "I do not believe that these boards [that's fibre
 12 cement boards] are intended for use as rainscreen
 13 cladding and I am not aware of any buildings on which
 14 these boards have been used for this purpose."
 15 Are you saying he is wrong about that?
 16 A. I don't know what he means by that, and maybe -- I was
 17 under the impression that fibre cement boards were
 18 available at the time, as used as external cladding, but
 19 not cement particle boards as an external cladding.
 20 That's my understanding.
 21 Q. We saw from your first witness statement from
 22 October 2018, which I showed to you, that when you
 23 described the 2005 test, the build-up of the cladding
 24 including UAC manufactured cement particle board
 25 rainscreen. That's what you said at paragraph 4.13(a).

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1 A. Yes.
 2 Q. Are you saying that's wrong?
 3 A. No, that's what's -- yeah, that's what's in the report.
 4 Q. Exactly.
 5 A. In the first witness statement, all I'm doing there is
 6 explaining what was in the report that people could see
 7 at the time. But in 2016, we came to the understanding
 8 that it was unlikely to be a cement particle board, more
 9 likely to be a fibre cement board.
 10 Q. You don't say that in your first statement --
 11 A. No.
 12 Q. -- either by way of qualification or revelation, do you?
 13 A. No, I don't.
 14 Q. Why is that?
 15 A. Because, like I say, I'm just stating there what would
 16 have been available in the report for people to see at
 17 the time.
 18 Q. When we come to the evolution of this point, it looks
 19 like Adam Heath, who had done some work on this, was of
 20 the view that fibre cement boards as opposed to cement
 21 particle boards were not intended for use as rainscreen
 22 cladding, and he is not aware of any buildings on which
 23 those boards have been used for that purpose.
 24 A. Well, fibre cement boards are used.
 25 Q. Nowadays, he says, "there are now fibre cement cladding

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1 materials available".
 2 A. Oh.
 3 Q. So my question is: when you signed your second and third
 4 witness statements, did you take into account
 5 Adam Heath's view that there are no buildings he's aware
 6 of on which fibre cement boards are used?
 7 A. No. I wasn't aware that he had that view.
 8 Q. Right.
 9 Now, I think you say in your third statement --
 10 let's go to that, please, at page 53 {KIN00022610/53} --
 11 that you became aware that the cladding material in the
 12 2005 test was incorrectly reported, as you say, in
 13 August 2016. If we go to paragraph 7.6, you can see
 14 that that is what you say. Do you see that?
 15 A. Yes.
 16 Q. Now, given that you had been told this in August 2016,
 17 was that before or after the conversation with
 18 Gwyn Davies where he told you that the 2005 test used
 19 a different version of K15, or was it part of the same
 20 conversation?
 21 A. It was part of the same development, so it probably
 22 would have been before I would have understood that that
 23 building board was different, because I spoke to
 24 Gwyn Davies after the test of the K115 product, whereas
 25 we would have found this out before the test in order to

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1 design the test for the K115 product.
 2 Q. Just so I'm clear, are there two conversations with
 3 Gwyn Davies about the 2005 --
 4 A. No, I didn't speak to Gwyn Davies about the building
 5 board.
 6 Q. You didn't?
 7 A. No.
 8 Q. So how did you discover in August 2016 that the cladding
 9 material or product used in the 2005 test was not cement
 10 particle board as described in the test but fibre cement
 11 board?
 12 A. So it was discussions with my team that were looking at
 13 doing the replica test for K115, which was earlier in
 14 2016. So when they were looking to source the products
 15 that were used in the original test, we came across this
 16 anomaly that it was reported as a UAC cement particle
 17 board. So we contacted -- I think Adam contacted UAC
 18 and said, "We would like to source some of this
 19 material", and they said, "Well, we don't do cement
 20 particle board", and then that raised the question,
 21 then: well, what was it?
 22 Q. And you inferred, I think, or somebody inferred, that it
 23 was fibre cement board?
 24 A. If it was UAC supplied, it would have had to have been,
 25 we understood, a fibre cement board rather than a cement

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1 particle board.
 2 Q. Right.
 3 Now, I want to put to you what Ivor Meredith said
 4 about this. Can we go to {Day75/67:3}, please. At
 5 line 3, Ms Grange is examining him and she asks him
 6 this:
 7 "Question: Now, staying on page 6, if we look two
 8 below that, we get 'Fixing Details' in bold, and we've
 9 got details of the Kooltherm again in the first line.
 10 Then if you look at the end of the second line, we can
 11 see it gives a description of the cladding that was used
 12 for this test, and you have:
 13 ""1200 mm x 900 mm x 6 mm thick cement particle
 14 boards, manufactured by UAC, were mechanically fixed at
 15 600 mm centres to an aluminium railing system which was
 16 also mechanically fixed to the block work substrate.'
 17 "Do you see that there?
 18 "Answer: Yes.
 19 "Question: As far as you were aware, were those
 20 cement particle boards non-combustible?
 21 "Answer: It was a non-combustible cement particle
 22 board manufactured by UAC Berhad, they were
 23 a Middle Eastern manufacturer. But, yes, it was
 24 non-combustible, as far as I was aware.
 25 "Question: Is that description of the outer

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1 cladding given there correct, that it had those
 2 dimensions, 6-millimetre thick cement particle boards
 3 manufactured by UAC? Is that description accurate?
 4 "Answer: Yes, that's definitely accurate."
 5 Do you have any reason, Mr Pargeter, to suggest why
 6 Ivor Meredith would be wrong in his recollection, as
 7 that evidence suggests?
 8 A. Other than the potential confusion between what is the
 9 difference between cement particle board, fibre cement
 10 board. I think you can see quite regular references to
 11 "cement board", and so I suspect that the difference
 12 between the two wasn't really understood, and that he is
 13 just referencing it as a cement particle board, and that
 14 is his belief, but actually our belief is it was a fibre
 15 cement board, but manufactured by the same people.
 16 Q. You see, he was there at the time and did the test and
 17 you weren't.
 18 A. That's correct.
 19 Q. So my question is: why would he get that wrong and you
 20 be right based only on inference?
 21 A. Because we just did the research. We tried to find out
 22 exactly what was tested by looking at records we had got
 23 and what records the BRE had got. It didn't give us
 24 anything conclusive, other than the fact that UAC didn't
 25 make a cement particle board. So it was either

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1 a different supplier, and it wasn't UAC, providing
 2 a cement particle board, or it was UAC providing a fibre
 3 cement board.
 4 And I think the -- and the other thing, the other
 5 clue, is that it's very regularly described as
 6 a non-combustible building board. Well, a cement
 7 particle board, as I understand it, is generally
 8 a B-rated product, so would be combustible or -- may be
 9 an A, I'm not sure, limited combustibility, whereas
 10 a fibre cement board is a non-combustible product.
 11 So certainly Ivor believed, in my view, that it was
 12 a non-combustible board that he was testing with, and if
 13 it was a cement particle board, that's probably
 14 unlikely.
 15 Q. Either way, we've got Ivor Meredith's recollection, as
 16 the man there at the time of the test, as against your
 17 inference later. I have to suggest to you that his
 18 recollection is more likely to be accurate than your
 19 2016 inferences based on market research done only at
 20 that time.
 21 A. Well, if UAC made a cement particle board, then there's
 22 a chance he'd be correct, but he was wrong on one of the
 23 counts.
 24 Q. And you might be wrong on one of those counts.
 25 A. We might be.

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1 Q. Yes.
 2 Now, can you go to your third statement, please, at
 3 page 54 {KIN00022610/54} and look at paragraph 7.8
 4 there. You're asked the question:
 5 "What action did you take, if any, when you came to
 6 understand that this may be the case?"
 7 And that's fibre cement board. You say:
 8 "The fact that the terminology in the report was
 9 incorrect did not concern me too much because as far as
 10 I was aware at the time (based on client communications
 11 during my tenure as Head of Marketing and Technical
 12 (Great Britain)), we described the 2005 BS 8414 Test as
 13 having been undertaken with a non-combustible cladding."
 14 What do you mean there by based on client
 15 communications during your tenure?
 16 A. Always under the opinion -- I don't think we ever
 17 described it otherwise -- that that system used was
 18 a non-combustible board on the outside, and so whether
 19 it was fibre cement or cement particle board cement was
 20 kind of terminology if the performance was always
 21 described as a non-combustible cladding.
 22 Q. No, I'll repeat the question. Perhaps I haven't made it
 23 clear. I'm asking you what you mean by "client
 24 communications".
 25 A. Oh, yeah, I think anybody enquiring about the test or

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1 our description of that test to clients would have been,
 2 you know, a non-combustible building board, or
 3 a non-combustible cement particle board.
 4 Q. I see. Are you saying here that customers were told by
 5 Kingspan during your tenure as head of marketing that
 6 the 2005 BS 8414 test had been undertaken with
 7 a non-combustible cladding without being specific as to
 8 whether it was cement --
 9 A. Yeah, that's --
 10 Q. -- particle board or cement fibre board?
 11 A. Yes.
 12 Q. Right.
 13 Now, let's just take it in stages.
 14 Would you first agree that best practice would
 15 require that the description of a tested system, tested
 16 under BS 8414, should at the very least identify
 17 precisely the components of the test?
 18 A. Yes, I would agree.
 19 Q. And do that fully and accurately?
 20 A. Yes.
 21 Q. Were you aware in 2015 that the BS 8414 test was
 22 a system test at the very least?
 23 A. Yes.
 24 Q. Were you also aware that any successful BS 8414 test
 25 could only ever relate to the specific build-up tested?

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1 A. In 2015, yes, other than the desktop study or
 2 an assessment route. But, yes, the test is on a very
 3 specific system.
 4 Q. Yes. I understand the qualification you make about the
 5 desktop study, and I'm going to assume, unless you tell
 6 me otherwise, that that comes from BCA Technical
 7 Guidance Note 18 --
 8 A. Correct.
 9 Q. -- June 2014.
 10 A. Yes.
 11 Q. But leaving that on one side, would you have been aware
 12 or were you aware at the time that any error in the
 13 description of the precise components of the build-up of
 14 the full-scale system as tested would be of fundamental
 15 importance, because otherwise if a designer sought to
 16 replicate the system said to have been tested, they
 17 wouldn't be doing so?
 18 A. Yes, I would agree with that.
 19 Q. Therefore, your statement about Kingspan recording the
 20 cladding or telling the clients that the cladding system
 21 was simply non-combustible would go against the very
 22 nature of BS 8414, because you would need to be able to
 23 identify the precise system components so that they
 24 could be replicated by the customer; would you agree
 25 with that?

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1 A. Yes, I would agree with that.
 2 Q. So far from reassuring you, the fact that this generic
 3 term, "non-combustible cladding", was ever used to
 4 describe an important component of the system I would
 5 suggest to you must have been a matter of concern to you
 6 when you discovered it; no?
 7 A. No, I just thought it was just confusing, the
 8 differences between cement boards, and that, you know,
 9 was always under the impression that it was
 10 non-combustible, and therefore any system relied on
 11 would have had to have been a non-combustible cladding
 12 board as well.
 13 Q. Did it not occur to you that you were leading customers
 14 to think that, as long as they used any old
 15 non-combustible cladding, that would satisfy BR 135 and
 16 BS 8414?
 17 A. I don't think we were, not at 2015, because I think
 18 we'd, you know, understood now that that system is just
 19 one particular system and they'd have to have a desktop
 20 study or an assessment done on it based on, you know,
 21 that data.
 22 Q. You say that may be the case in 2015, but did it not
 23 concern you that that had been the case historically,
 24 that historically customers had been told that the
 25 cladding was non-combustible without identifying

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1 precisely what it was?
 2 A. No, it didn't.
 3 Q. Why is that?
 4 A. Well, I think because it was very unlikely anything was
 5 ever built with a cement particle board, so it could
 6 have only really been used as part of an assessment
 7 because they wouldn't have been using cement particle
 8 board. They may have been using an alternative
 9 non-combustible board to build their buildings with, but
 10 not a cement particle board.
 11 Q. How could you have thought, even historically, that it
 12 was acceptable to put out a report or description of the
 13 BS 8414 test that only described the cladding as
 14 non-combustible?
 15 A. No, the report does -- the report says UAC cement
 16 particle board, but the description of the performance
 17 of that board has always been non-combustible.
 18 Q. Now, were you aware that the Building Research
 19 Establishment, the BRE, had specifically told Kingspan
 20 at a meeting in 2006 -- and I appreciate that was before
 21 your time -- that the scope for the BS 8414 test in 2005
 22 didn't cover non-combustible cladding as a generic
 23 expression, and could only be relevant for particular
 24 boards used as outer cladding in the actual test itself?
 25 A. I wasn't aware of that at the time, no.

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1 Q. You would agree, I think, that if a BS 8414 report
 2 simply said "metal cladding", that would be useless to
 3 anybody wishing to replicate the build-up, wouldn't it?
 4 A. To replicate it precisely, yes.
 5 Q. Well, to replicate it in such a way that the external
 6 wall construction they put on their building complied
 7 with the Building Regulations.
 8 A. Correct, yes.
 9 Q. Yes. I would suggest that Kingspan deliberately
 10 described the system tested as using non-combustible
 11 cladding so that they could say that the test applied to
 12 any non-combustible cladding system, as opposed only
 13 specifically to the boards, whether they were fibre or
 14 particle, used in the test.
 15 A. I think historically that seems to be the evidence that
 16 we've seen, yes.
 17 Q. You accept that.
 18 When you made that discovery, what did you do about
 19 it?
 20 A. About the difference in the description of the board?
 21 Q. Yes. During your tenure as head of marketing and
 22 technical, as you say.
 23 A. Other than to try to ensure that the repeat test was
 24 done on a fibre cement board, I didn't do anything
 25 further than that.

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1 Q. Why didn't you undertake an investigation immediately as
 2 to how it could come about that clients were being told
 3 that the cladding used was simply non-combustible, as
 4 opposed to directing clients precisely to what the test
 5 reports said, namely it was cement particle board, or to
 6 tell the clients that in fact the test report was wrong
 7 and it was fibre board? Why did you not do that?
 8 A. Because, like I say, you know, it was always inferred
 9 that it was a non-combustible board. It was never going
 10 to be a system that was going to be built precisely as
 11 a cement particle board. So I just took it that, as
 12 we'd always described it as a non-combustible board,
 13 however they were using that report would still be fine.
 14 Q. Do you accept that Kingspan's product literature for K15
 15 throughout the entire period from May 2007, before your
 16 time, to July 2016, well into your time, makes no
 17 reference at all to the specific material used as the
 18 outer cladding in the May 2005 test?
 19 A. That's correct.
 20 Q. Again, do you accept that that was done deliberately by
 21 Kingspan in order to ensure that K15 could be more
 22 widely used than the ambit of the test prescribed by the
 23 build-up of the 2005 test itself?
 24 A. Like I say, I think the evidence that's come out that
 25 that was the intention of the 2005 test, was to try and

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1 get a baseline system tested which, from that, then
 2 could develop assessments and, you know, we've seen
 3 Ivor's evidence that that was the intention to do with
 4 the BRE, that they would give that assessment. So
 5 I think that was the view, yes.
 6 Q. Did you ever investigate, even after 2016, why
 7 Kingspan's product literature up to that time in this
 8 respect used this useless and misleading nomenclature
 9 for the cladding?
 10 A. No, I didn't. I didn't think it --
 11 Q. Why is that?
 12 A. I didn't think it was useless, and I thought it was
 13 still useful to use in terms of a desktop study,
 14 for example.
 15 Q. But it wouldn't have been useful in a desktop study
 16 unless the person conducting the desktop knew exactly
 17 what the product was; do you accept that?
 18 A. But that's -- correct, yes.
 19 Q. Having discovered in August 2016 that UAC Berhad cement
 20 particle board, as you say, wasn't used in the 2005
 21 test, did you actually then seek to verify the product
 22 that had actually been used?
 23 A. I think we did with UAC. I can't remember now. I think
 24 Adam found a delivery note or something which might have
 25 indicated the product name, but I can't remember

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1 precisely. I might be wrong there.
 2 Q. What did you do to satisfy yourselves that it actually
 3 was non-combustible?
 4 A. Erm ... I can't recall, and I think we did find out
 5 exactly what board it was, and that was not -- but
 6 generally --
 7 Q. Really?
 8 A. -- fibre boards -- I might be wrong, but generally fibre
 9 boards are non-combustible.
 10 MR MILLETT: Right.
 11 I want to look now -- and, Mr Chairman, we'll start
 12 this topic. We won't finish it before 1 o'clock, but
 13 I will have a start, if I may.
 14 SIR MARTIN MOORE-BICK: All right.
 15 MR MILLETT: I will ask you now to help me with how the
 16 cladding is referred to in documents. Can we start with
 17 your second witness statement, please, at page 101
 18 {KIN00020824/101}, and go to the top of that page,
 19 please, at paragraph 10.59. This is a reference to the
 20 BS 8414 test in 2005, the question is:
 21 "Did you believe that the test had been successful?
 22 If so, on what basis?"
 23 You say:
 24 "When I took over as Head of Technical, in May 2015,
 25 the 2005 BS 8414 Test Report was being relied on by the

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1 Technical team and was included in K15's BBA
 2 certificate , LABC Registered Detail and K15 product
 3 literature . I understood that the 2005 test had been
 4 successful on this basis. This understanding was
 5 further supported with the issue by the BRE of the
 6 BR 135 Classification Report (report number
 7 P101812-1000) in 2015 without any issues being raised."
 8 Now, it's right, isn't it, that the numerous BBA
 9 certificates for K15 that we've seen -- and we can look
 10 at them in a moment, some of them -- listed the specific
 11 build-up of the 2005 test, don't they?
 12 A. Correct, yes.
 13 Q. If we go to one of those, which is the one for
 14 October 2015, {BBA0000040}, please, this is the
 15 BBA certificate for K15 issued on 8 October 2015, if you
 16 look at the bottom of the page. You see that there?
 17 A. I do.
 18 Q. That was while you were head of technical and marketing,
 19 wasn't it?
 20 A. Yes, that's correct.
 21 Q. If we scroll down to page 5 {BBA0000040/5}, please, and
 22 look at the heading "Behaviour in relation to fire" at
 23 the bottom of the page, we can see section 8.2. The
 24 construction build-ups are listed there, and the
 25 specific build-up from the 2005 test is listed under the

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1 heading "Construction 1", isn't that right?
 2 A. Correct.
 3 Q. And it goes over the page. You can see that the first
 4 element there is the 60-millimetre K15 insulation board,
 5 and the second is 6-millimetre cement particle boards
 6 mechanically fixed at 600-millimetre centres to
 7 an aluminium railing system. So that's clearly the 2005
 8 test, as you have just accepted.
 9 If we go to {KIN0000077}, this is the LABC
 10 certificate for K15 issued in August 2013, and then
 11 issued again on 24 March 2016. By this time, you are
 12 head of technical and marketing, aren't you? That's
 13 right, isn't it?
 14 A. Which date was that, March 2016, did you say?
 15 Q. No. Yes. Issue dated 24 March 2016. First issued
 16 28 August 2013.
 17 A. Yes, correct.
 18 Q. So this is issued at a time when you are head of
 19 technical and marketing, isn't it?
 20 A. Yes, correct.
 21 Q. If we go to page 6 of this document {KIN0000077/6}, we
 22 see there, under "Supporting Documentation", that the
 23 third item down is the "K15 Product Specification &
 24 Classification Report Index".
 25 If we want to see that document, that's at

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1 {KIN00000075}. If we have that blown up, we can see
 2 that that's a list of BS 8414 test build-ups involving
 3 K15, and in the first line -- it's rather indistinct ,
 4 I'm afraid -- you can see -- and if you can't, I'll try
 5 and help you --
 6 A. I can see it says cement particle board.
 7 Q. It says 6-millimetre thick UAC cement particle board,
 8 yes, thank you.
 9 So the BBA certificate and the LABC certificate
 10 either state expressly or incorporate references to
 11 cement particle board.
 12 Now, if we go to {KIN0000086}, we can see this is
 13 Kingspan's "Routes to Compliance: Fire Safety"
 14 literature , first released in August 2015, which you
 15 I think signed off before it was finally signed off by
 16 Richard Bromwich and Richard Burnley --
 17 A. Correct.
 18 Q. -- in that month, wasn't it?
 19 A. Yes.
 20 Q. If we go in that document to page 6 {KIN0000086/6}, on
 21 the left -hand side of that page we can see "Large Scale
 22 Test Data", do you see, under "Performance-based Route",
 23 and it says:
 24 "Large Scale Test Data.
 25 "Kingspan Kooltherm K15 Rainscreen Board has been

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1 tested in differing thicknesses with a range of cladding
 2 materials to BS 8414-1:2002 and BS 8414-2:2005, in
 3 accordance with the performance criteria set out in
 4 BR 135.
 5 "Refer to Appendix B for details of the build-ups
 6 that have been successfully tested."
 7 We can go to appendix B on page 17 {KIN0000086/17}
 8 of this document, and we can see there a heading
 9 "Large Scale Test Data", you see that there, and there
 10 are three build-ups identified . The first one on the
 11 left -hand side is the 8414:2002 test done in 2005. You
 12 see that?
 13 A. Yes.
 14 Q. It has a line there to the cladding in the image, and it
 15 says "6mm non-combustible cement board cladding",
 16 doesn't it?
 17 A. It does.
 18 Q. It refers also to the BRE 2005 report, which I think, as
 19 we've seen, also refers to the cement particle board.
 20 That's right, isn't it?
 21 A. Correct.
 22 Q. So this document dated 2015 wasn't intending to correct
 23 that description; it was in a way perpetuating it; yes?
 24 A. It was perpetuating the fact that it was
 25 a non-combustible cement board, yes.

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1 Q. Cement board cladding.
 2 A. Yes.
 3 Q. It doesn't say cementitious fibre board, does it?
 4 A. No.
 5 Q. Can you think of a reason why that description was used,
 6 non-combustible cement board cladding, if in fact
 7 cementitious fibre board had been used?
 8 A. I don't know whether that was just a lift from previous
 9 descriptions, and it probably also pre-dates the
 10 knowledge that it was a fibre cement board.
 11 Q. And the desktop assessments done in 2014 and 2015 which
 12 you listed in your statement all refer to the May 2005
 13 test, which refers to cement particle board, don't they?
 14 A. Yes.
 15 Q. So can you confirm that all of the documents that we've
 16 looked at -- the BBA certificate, the LABC certificate,
 17 the routes to compliance August 2015 Kingspan document,
 18 and all six desktops -- would have been incorrect in
 19 their description of the cladding referred to in the
 20 2005 test if in fact it had been fibre board and not
 21 cementitious particle board?
 22 A. Yes, I do.
 23 Q. And do you also accept that each of these documents that
 24 we have been examining is misleading because they
 25 conceal the fact that the K15 being sold after 2006 is

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1 not as tested in the tests referred to?
 2 A. I don't think it's misleading, no.
 3 Q. You don't think it's misleading? Why is that?
 4 A. Like I've explained, the performance of the board we
 5 expected to be -- was the same, under the impression it
 6 was the same, so from my perspective it wouldn't be
 7 misleading.
 8 MR MILLETT: From your perspective it wouldn't be
 9 misleading.
 10 Well, perhaps we can continue that debate after the
 11 lunch break, Mr Chairman.
 12 SIR MARTIN MOORE-BICK: Is that a good point, Mr Millett?
 13 MR MILLETT: Yes.
 14 SIR MARTIN MOORE-BICK: I think it's time we all had a break
 15 for lunch, Mr Pargeter, so we will stop now. We will
 16 come back at 2.05, please. Again, please don't talk to
 17 anyone about your evidence over the break.
 18 THE WITNESS: Of course.
 19 SIR MARTIN MOORE-BICK: All right? If you would like to go
 20 with the usher, please.
 21 (Pause)
 22 Thank you, 2.05, please.
 23 (1.05 pm)
 24 (The short adjournment)
 25 (2.05 pm)

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1 SIR MARTIN MOORE-BICK: Right, Mr Pargeter, ready to carry
 2 on?
 3 THE WITNESS: Yes. Yes.
 4 SIR MARTIN MOORE-BICK: Thank you very much.
 5 Yes, Mr Millett.
 6 MR MILLETT: Thank you, Mr Chairman.
 7 Mr Pargeter, we were looking, I think, at
 8 {KIN00000086/17}, and appendix B of that document, which
 9 was Kingspan's routes to compliance, August 2015. If
 10 you go back to page 17, please, in that, where we were,
 11 you can see the three diagrams there set out.
 12 Now, I'd asked you about the reference to the
 13 6-millimetre non-combustible cement board cladding, and
 14 I think I was halfway through asking you about the
 15 material used in the test.
 16 If you look at BS 8414-1:2002, the diagram on the
 17 left-hand side, you can see underneath it says:
 18 "Build-up: Cement board cladding & masonry
 19 blockwork.
 20 "Report No.: 220876."
 21 It's right, isn't it, that that report number is the
 22 BRE test report dated December 2005 for the 31 May 2005
 23 test?
 24 A. Yes, I believe so.
 25 Q. Therefore, do you accept that, by this document, you

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1 were representing to the market that the rainscreen used
 2 and the insulation material used in that build-up was as
 3 per that report?
 4 A. Yes, I would agree with that.
 5 Q. And that was wrong.
 6 A. In what way was that wrong?
 7 Q. Well, that was wrong in two ways: first of all, you now
 8 say the cement board cladding was actually fibre
 9 cementitious board; and, secondly, you accept that the
 10 insulation material being used at the time of this
 11 document, August 2015, was not as tested in 2005. So it
 12 was wrong in those two respects.
 13 A. It was, but it wasn't until, you know, 2016 that it was
 14 in my knowledge about the -- those differences.
 15 Q. Yes.
 16 A. And, like I've explained, you know, I didn't think there
 17 were significant differences between the fire
 18 performance of the products, but this document pre-dates
 19 that.
 20 Q. You're getting ahead.
 21 Do you accept, first of all, that those two
 22 statements in those two respects were wrong in this
 23 document?
 24 A. Yes.
 25 Q. And do you accept that anybody not knowing that it was

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1 wrong would think it was right and would thereby be
 2 misled?
 3 A. I don't think they would be misled, because we're
 4 describing the board as a non-combustible board, and the
 5 report gives you the rest of the detail, so I think it
 6 could be clearer.
 7 Q. Well, they would at least be misled into thinking that
 8 the material tested in 2005 in the report number
 9 identified there was the same as identified in the
 10 diagram, wouldn't they, and that wasn't the case?
 11 A. Well, it's a cement board.
 12 Q. No, I'm talking about the report number, which is the
 13 BRE report, which is the report in relation to the 2005
 14 test.
 15 A. Yes.
 16 Q. If they looked at that report and looked at this
 17 document and put the two side by side, they might think
 18 that the K15 was the same in the test as it is in this
 19 document. In fact, they would be bound to, wouldn't
 20 they?
 21 A. Yes, they would.
 22 Q. And they would be misled by that, wouldn't they?
 23 A. No, because the performance of the board would be
 24 similar, so they wouldn't be misled. It's still
 25 a phenolic foam board, the same as in the 2005 test, as

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1 in the report.
 2 Q. No, you see, what you're doing is excusing it from being
 3 misled by reference to the outcome, the potential
 4 consequences. I'm putting to you a different point,
 5 which is that, as a matter of fact, anybody reading this
 6 2015 document would think that the K15 tested in 2005
 7 was the K15 being sold pursuant to this document,
 8 wouldn't they?
 9 A. Yes.
 10 Q. And they would be wrong about that, and thereby misled
 11 by the reference, the representation about the report,
 12 wouldn't they?
 13 A. Yes.
 14 Q. Yes.
 15 When you eventually discovered in 2016 that in fact
 16 the material tested in 2005 was different or very likely
 17 to be different from that which was being sold by 2016,
 18 did it occur to you that you should be qualifying your
 19 marketing literature straight away, such as this, by
 20 immediately telling the market not to rely on appendix B
 21 of the August 2015 routes to compliance?
 22 A. No, it didn't, for the reasons I've given before.
 23 I didn't think that the differences were large enough to
 24 warrant that.
 25 Q. So you took it upon yourself to keep that to yourself by

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1 reason of your own private opinion -- perhaps shared
 2 with Mr Davies, I don't know -- that it didn't matter?
 3 A. Yes, I think I did.
 4 Q. Was that plain dealing, do you think? Do you think that
 5 was straight?
 6 A. I think it was straight, yes.
 7 Q. You think it was?
 8 A. Yes.
 9 Q. I've got to suggest to you that it wasn't and that it
 10 was dishonest. Do you want to comment on that?
 11 A. I don't think it was dishonest at all.
 12 Q. You don't.
 13 Did you ever wonder, going back to the question of
 14 particle board or fibre board, why something like either
 15 particle board or fibre board was used as the cladding
 16 on the test as opposed to a commonly used and clearly
 17 identified rainscreen product?
 18 A. I think it came out when we were looking at the -- when
 19 we were looking at why that was done, as a -- it was as
 20 a representation of a cladding system, which was
 21 a non-combustible outer rather than a specific system in
 22 itself. That was the intention, I believe.
 23 Q. I see. So you understood, when you did look at it, that
 24 in fact the 2005 test wasn't intended to be a specific
 25 system but a representation. By representation, do you

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1 mean a simulation?
 2 A. Yes, of a non-combustible system, if you like.
 3 Q. Yes. Can you give us a date when you were looking at
 4 it, as you say?
 5 A. Probably it would have been when we were looking to do
 6 the replica test. It may also have been just
 7 discussions in the office, but probably when we were
 8 looking at the -- to do the replica test.
 9 Q. Can you give me a date?
 10 A. Well, that was 2016, early -- well, mid-2016 when we
 11 were looking at that K115 test.
 12 Q. Right, we'll come back to that shortly.
 13 Can I then move to the question of the replica
 14 tests.
 15 I think you have said in your evidence that you made
 16 two replica tests of the 2005 test, first in 2016 and
 17 then in 2019; is that right?
 18 A. Correct.
 19 Q. That's June 2019.
 20 A. Yes.
 21 Q. 6 June, to be precise.
 22 A. I think so.
 23 Q. Now, I want to look at the 2019 attempt first, and then
 24 we'll look together at the 2016 attempt.
 25 A. Yes.

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1 Q. In relation to the 2019 attempt to replicate the 2005
2 test, were you the ultimate decision-maker within
3 Kingspan about having that test?
4 A. About having that test?
5 Q. About undertaking it.
6 A. The 2019?
7 Q. Yes.
8 A. No, that was part of a discussion I had with
9 John Garbutt and our divisional managing director about
10 the replacement test or replica test needed to undertake
11 before we could tell the fire engineers what the
12 implications of the withdrawal of the test report might
13 be.
14 Q. Right. So this discussion was with John Garbutt and
15 a divisional managing director; who was that?
16 A. Peter Wilson.
17 Q. Peter Wilson, okay. So you discussed it with them, and
18 when did you have those discussions, do you remember?
19 A. They would have been February or March, around that
20 time.
21 Q. Before the withdrawal of the 2005 test report from
22 the --
23 A. From the website?
24 Q. -- from the website?
25 A. Yes, that's correct.

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1 Q. I see.
2 Was the purpose of this 2019 test to demonstrate
3 that, had the 2005 test been undertaken with standard
4 K15, in other words the K15 that you were selling in
5 early 2019, it would have passed?
6 A. Yes.
7 Q. Now, the 2005 test report, although withdrawn from the
8 website, was only withdrawn from circulation in late
9 October 2020, wasn't it?
10 A. Well, when you say from circulation -- now, we'd written
11 to the fire engineering community to explain what we
12 understood about the product and provided the
13 replacement or alternative testing to give an indication
14 of how the current product would perform in a similar
15 performance, but it was off the -- off our website long
16 before then.
17 Q. It was off your website, but you didn't withdraw the
18 2005 test, the BRE test 220876, until 23 October 2020,
19 as we've established.
20 A. That's correct.
21 Q. Why did you not withdraw that test then, whilst the
22 testing was being carried out, the 2019 replica test was
23 being carried out, rather than waiting for so many
24 months?
25 A. I think because we needed to understand what the

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1 implications were, so at the same time as withdrawing
2 it, we could provide evidence, test evidence, and
3 opinion, on the implications.
4 Q. Right. Well, let's track this through a little bit more
5 closely.
6 Can we go to your second statement, please, and turn
7 to page 94 [KIN00020824/94], and go to paragraph 10.32,
8 please. We see there that, near the centre of the page,
9 it says:
10 "As a result of these uncertainties as to what was
11 tested in 2005, Kingspan has now undertaken a BS8414-1
12 test at BRE, using a similar build up to that tested in
13 2005 (to the best of our knowledge and based on
14 currently available materials) using 80mm K15 from
15 current production. Because of the passage of time it
16 is impossible to be sure that this test exactly
17 replicated the 2005 test but Kingspan nonetheless
18 decided that it should try and replicate the 2005 BS8414
19 test as far as possible but using 'new technology' K15.
20 This test was conducted on 6 June 2019 and we understand
21 from observing and reviewing the thermocouples data that
22 it met the BR 135 criteria. Once we have received the
23 test report and BR 135 Classification Report it will be
24 made available on the Kingspan website."
25 That's your statement in October 2019, isn't it?

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1 A. Yes, that's correct.
2 Q. That's the second statement.
3 Now, you say in this paragraph that it was as
4 a result of these uncertainties that Kingspan undertook
5 that test.
6 Was it in fact the true position that Kingspan
7 attempted to replicate the 2005 test in June 2019 as
8 a result of questions being posed about that test by
9 this Inquiry?
10 A. I think it was in relation to the understanding that we
11 shouldn't be relying on that test any further, and then
12 thinking of the implications of what that might mean in
13 terms of its previous reliance, and so then that was why
14 the replication tests were decided to -- it would be
15 needed to evidence what the implications might be on the
16 current product.
17 Q. Well, I can understand why you would want to do the
18 test. My question is: is what catalysed you actually
19 doing the test in June 2019 the questions being posed to
20 Kingspan by this Inquiry?
21 A. It was definitely a factor, definitely.
22 Q. A factor? What other factors are there?
23 A. Well, we probably wouldn't have gone into the depths of
24 investigating it without, so I agree, yes, it was.
25 Q. Yes.

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1 Is the reason why there was a delay between 2016,
 2 when you first discovered the problem, and no test until
 3 mid-2019 the fact that the Inquiry kept asking questions
 4 about it?
 5 A. No, I think once -- obviously once we became core
 6 participants, the work to provide all the evidence we
 7 could find had commenced, and we provided that evidence
 8 which shows that, you know, the product was old
 9 technology versus new technology. So we weren't just
 10 being prompted by questions; we provided that evidence
 11 to prompt further questions as well.
 12 Q. Is it right that, but for the fire and then this
 13 Inquiry, you wouldn't have had a replica test in 2019,
 14 you wouldn't have withdrawn the test from the website,
 15 and wouldn't ultimately, in October this year, have
 16 withdrawn the test report completely?
 17 A. I can't say whether we would or we wouldn't, I think --
 18 Q. Well, you can, I think, because you were there, and I'm
 19 asking you -- and it's really another way of putting the
 20 same point -- it's the fire and the aftermath and this
 21 Inquiry that has led you to re-test, withdraw the
 22 original test from your website and ultimately withdraw
 23 the test altogether, isn't it?
 24 A. Yes, at this -- I would agree with that.
 25 Q. Thank you, yes.

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1 Now, can we look further into this statement at
 2 10.33. You say at the bottom of that page:
 3 "I consider that the recent test confirms that if
 4 the 2005 BS 8414 Test had been conducted with K15 as
 5 currently sold on the market, it would have satisfied
 6 the BR 135 criteria. Given the change in technology,
 7 however, Kingspan has removed the 2005 BS 8414 Test
 8 Report from its website."
 9 Now, we looked at this a little bit earlier today,
 10 but on what basis do you consider that you're qualified
 11 to make that judgement?
 12 A. What judgement, sorry?
 13 Q. Well, the judgement I've just shown you, your view that
 14 I showed you at the bottom of the previous page.
 15 A. Oh, that it would pass --
 16 Q. Your view that the recent test --
 17 A. The current product would pass?
 18 Q. Yes, let me rephrase the question, since you asked me to
 19 clarify.
 20 On what basis do you consider that you're qualified
 21 to make the judgment that the recent test confirms that
 22 if the 2005 BS 8414 test had been conducted with K15 as
 23 currently sold, it would have passed?
 24 A. Just based on that test report.
 25 Q. Just based on that test report?

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1 A. That 2019 test, yes.
 2 Q. I see.
 3 Does it remain your view today that, given that the
 4 2019 test was successful, that confirms that the 2005
 5 test would have been successful if it had used standard
 6 K15?
 7 A. It's my belief, yes, it would have done.
 8 Q. If that is so, can you explain, then, why you have
 9 withdrawn the 2005 test, as you did in October this
 10 year?
 11 A. Well, one, it's an old test now, and because of the,
 12 you know, differences that we found in terms of the
 13 change in technology, it was just -- we just thought it
 14 would be prudent to withdraw it and no longer rely on
 15 it.
 16 Q. Right. Well, we'll come back to that.
 17 Can I now look at the 2016 attempt to replicate the
 18 2005 test with K115, because I think it was an attempt
 19 to replicate it with K115, as you said earlier.
 20 A. Correct, yes.
 21 Q. Now, do you remember that you were advised by the BRE
 22 that if you repeated the 2005 test using the K115
 23 product, a direct comparison could be made between both
 24 sets of data with a view to extending the 2005 K15 test
 25 data to K115?

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1 A. That was the intention, yes.
 2 Q. Now, it's right, isn't it, that before Kingspan
 3 attempted to replicate the 2005 test with standard K15
 4 in 2019, you had already attempted that in 2016, for the
 5 reasons you have identified, and let's look at an email,
 6 {KIN00007492}, please. If we look at the second email
 7 down the page, we can see that this is an email from you
 8 to Gwyn Davies and others, including Richard Burnley, on
 9 9 December 2016 at 13.24, and you say:
 10 "Guys
 11 "Following the latest 8414 pt 1 for K115 we observed
 12 sustained flaming at the top of the rig so knew it would
 13 be a fail. We have now received the TC data, and it's
 14 not looking good. The insulation layer saw temperatures
 15 of 900 degrees. I have attached the data from the test
 16 and the report from the previous test for comparison."
 17 Then you set out some initial thoughts.
 18 Do you remember how long before you sent this email
 19 the test actually took place?
 20 A. Oh, I can't remember precisely. It wouldn't have been
 21 too long before.
 22 Q. You then go on to draw some detailed comparisons between
 23 the 2005 test and this test, this 2016 test. Do you
 24 see?
 25 If you look at the first set of bullet points, there

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1 are six of them. If you look at the last bullet point
 2 on that page, you say:
 3 "The only known difference from first part 1 is
 4 obviously the insulation and the fire barriers, original
 5 had Stainless Steel 1.5/2mm thick vented barriers which
 6 were removed from the market as they did not comply with
 7 today's performance requirements, so we effectively
 8 replaced them with better performing ones from Siderise
 9 (MF batts with intumescent strip)."
 10 So it looks from that -- is this right? -- that you
 11 attempted to mirror the 2005 test other than the
 12 fire barriers and the insulation itself .
 13 A. Yes, we were trying to get as close a replication as we
 14 could.
 15 Q. What was the rainscreen cladding used in that test
 16 there?
 17 A. That was a fibre cement cladding panel.
 18 Q. If we go on to the second set of bullet points, towards
 19 the bottom of the page, you say:
 20 "From observations the
 21 •" K115 seemed to continue to burn for longer after
 22 the crib was extinguished compared to previous tests and
 23 completely disintegrated all the way to the top of the
 24 main wall.
 25 •" The wing wall had to be extinguished.

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1 •" There were several very loud pops/bangs/pocking
 2 noises during the test not heard before. The cladding
 3 and insulation came away from the wall all the way to
 4 the top on the front face, unlike the first test."
 5 Then you say:
 6 "... unlike the first test presumably because of the
 7 increased temperature."
 8 Then in the next sentence you say this :
 9 "I have a concern that we just do not really know
 10 what product was tested in the first test 10 years ago,
 11 so I would like to compare the performance of K115
 12 against K15 as it is today in a known test."
 13 Now, pausing there, you're talking about K15, aren't
 14 you?
 15 A. Yes.
 16 Q. Why didn't you know at that stage what the tested K15
 17 product was in 2005?
 18 A. I think I didn't, you know, because I didn't have the
 19 knowledge of the history of it, and it was so long ago,
 20 it was just a question mark for me to follow up on.
 21 Q. Well, you say, "we just do not really know", which looks
 22 like Kingspan doesn't really know, as opposed to you
 23 personally. Is that wrong?
 24 A. Well, it's probably me and my team at that --
 25 Q. Right.

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1 A. That's probably what I was referring to as the "we"
 2 there.
 3 Q. Is there no way you could investigate exactly what the
 4 K15 was that had been used in the 2005 test?
 5 A. That's the follow-up email and discussion with
 6 Gwyn Davies.
 7 Q. Right. Well, we will look at that in a moment.
 8 I was going to ask you: did you have the SOP for
 9 this product, the standard operating procedure for it?
 10 A. Oh, I think we might have done.
 11 Q. That would tell you exactly what was tested in 2005,
 12 wouldn't it?
 13 A. Yes, I think it would have done.
 14 Q. So why didn't you call for that?
 15 A. Erm ... I just -- I didn't, I just had that discussion.
 16 Q. Yes, I know, but it looked pretty critical, didn't it,
 17 looking at this comment, that one of the problems was
 18 that you didn't actually know what the product was that
 19 had been tested in that test ten years ago, and
 20 therefore you had to compare the performance of K115, as
 21 you just described it rather graphically, against K15 as
 22 known today. That was what the problem was. So one
 23 solution, instead of going through that rigmarole, would
 24 have been simply to look at the SOP and find out what
 25 the product was; no?

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1 A. It would have been, but I don't have access to SOPs, so
 2 that's why I would have discussed it with Gwyn.
 3 Q. Who would have had access to the SOPs?
 4 A. Gwyn, Gwyn would have had access to them.
 5 Q. Why didn't you ask him to look at them?
 6 A. I didn't think about SOP data at the time.
 7 Q. Gwyn Davies was the first person on this email. Did he
 8 not come back to you and say, "Well, look, Adrian, this
 9 is easy, I can look at the SOPs and find out exactly
 10 what was tested?"
 11 A. He came back and he did confirm that he thought that was
 12 old technology.
 13 Q. Right. So your question was answered.
 14 A. Yes.
 15 Q. Before we leave this email, I just want to ask you one
 16 thing about it that I had later for you, but since we're
 17 on it, I can ask you now.
 18 Looking at the third paragraph there on page 2
 19 {KIN00007492/2} of this email run, it says:
 20 "One option is to replicate the above part one test
 21 with K15 which will give best direct comparison but that
 22 leaves us hoping it is worse than K115 and we then have
 23 two failed tests in which to convince the BRE to
 24 [assess] K115, based on 'it's not as bad?'"
 25 What was going on there?

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1 (Pause)

2 A. Yeah, so we'd done that system on K115, so one option

3 would be to test it with K15 --

4 Q. Yes.

5 A. -- as current -- as we know it currently. But because

6 that test, the first test, had failed, and we weren't

7 under the impression that, you know, there should be too

8 significant a difference between them, then, you know,

9 there was always a risk that the K15 might fail.

10 Q. Why did you say "that leaves us hoping it is worse than

11 K115"? Why would you hope the K15 you were selling to

12 the market --

13 A. Because --

14 Q. -- was worse than K115?

15 A. Because we were looking for reasons to move K115 into

16 the market, so if we could show it performed better than

17 the current K15, then that would potentially lead to

18 being able to use it. But when you do a test like that,

19 what you're then relying on is that the K15 would then

20 need to perform at least as well or worse to show the

21 use of K115, if you see what I mean. If it had passed

22 with flying colours, then you're back wondering whether

23 K115 is a product we should move forward with.

24 Q. What did you hope to achieve by having two failed tests?

25 A. No, we didn't pursue that route. It was not a logical

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1 route.

2 Q. No, but I'm just really asking, just trying to find out,

3 what was in your mind at the time. How would you hope

4 to have K15 that you were selling fail, and fail worse

5 than K115, and then go to the BRE to assess K115 on

6 a better basis? How was that going to work?

7 A. It was just in the context of seeing how K115 would

8 perform. It wouldn't -- it wasn't a great option.

9 Q. Well, it doesn't seem to be rational, unless you can

10 explain it.

11 A. And we didn't do it.

12 Q. Right.

13 Now, exhibited to your fourth witness statement is

14 a schedule which shows all major changes to the K15

15 product since its inception, and that is at

16 {KIN00022307}, and we'll need the native version of

17 that. I just want to be very clear about the document

18 we're looking at. If we could look at the native

19 version, this is an Excel spreadsheet.

20 If we go to the second tab, "Major changes", which

21 we're on I think at the moment, and go down to row 7.

22 This is something you referred to in your statement we

23 looked at earlier, we glanced past it. If you look at

24 row 7 -- and I know from my own personal experience this

25 is not a particularly easy document to handle on the

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1 screen, but we need to look at that.

2 This is the test. We can see that September 2006,

3 the transfer to Kesteren technology took place, and that

4 one of the changes introduced was, as recorded in

5 column B, perforated facings. That's right, isn't it?

6 A. I understand so, yes.

7 Q. If that's right, that would tend to indicate, wouldn't

8 it, that before September 2006, and therefore in

9 May 2005 at the time of the BS 8414 test, the K15

10 product had unperforated foil facers?

11 A. It would.

12 Q. If we move across row 7 to column D, "Authorisation

13 Document", we can see an entry there, the process change

14 has been recorded in something called PPDS 128. Yes?

15 A. Yes.

16 Q. Did you check PPDS 128?

17 A. No.

18 Q. Why is that?

19 A. When?

20 Q. No, why?

21 A. I mean, when would I have checked it?

22 Q. Yes.

23 A. When are you asking?

24 Q. Well, this document was prepared by you for the

25 purposes --

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1 A. Oh, no, this document has been prepared by Gwyn Davies

2 primarily, looking back at the data, and then supplied

3 in with my witness statement.

4 Q. Yes. So when you provided this with your witness

5 statement, were you not able to look at PPDS 128?

6 A. Oh, possibly.

7 Q. Did you?

8 A. No.

9 Q. Why is that?

10 A. I didn't think I needed to.

11 Q. Would it not have assisted you in understanding what

12 exactly was tested in 2005?

13 A. Possibly.

14 Q. Why didn't you look at it, then, if possibly it would

15 have done?

16 A. I just -- it never crossed my mind to look at it.

17 Q. Right.

18 Let's go back to your passage in your third witness

19 statement at page 52 {KIN00022610/52}, paragraph 7.1,

20 please. We have looked at this before. This is where

21 you say that you think you first became aware that the

22 2005 BS 8414 test may have used a different version of

23 K15 in 2016.

24 In fact, it's right, isn't it, and clear from the

25 9 December 2016 email that we have been looking at --

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1 I'll go back to it if you like -- that, by
 2 December 2016, you had an extremely detailed
 3 understanding of the May 2005 test and the differences
 4 between that test and the 2016 K115 test because you
 5 were able to set them out?
 6 A. Yes, in terms of the build-up of the test, yes.
 7 Q. So your first awareness and detailed understanding was
 8 pretty clear by at least December 2016, wasn't it?
 9 A. Of the details of the test, yes.
 10 Q. Yes. So when you say in your statement here at 7.1 that
 11 your detailed understanding started to develop in 2018,
 12 what did you find out by the end of 2018 or from the end
 13 of 2018, as you say, that you hadn't learnt by the end
 14 of 2016?
 15 A. I think some of the details around the Kesteren change,
 16 the exact dates, and some of the details that we'd found
 17 as part of that investigation, and some of them,
 18 I understand, like the facer change, but some of the
 19 chemistry I don't understand.
 20 Q. When did you discover the differences in the facer
 21 change and some of the chemistry?
 22 A. That would have been 2018 onwards.
 23 Q. Right.
 24 I then want to turn, if I can, to how this
 25 culminates, which is the 23 October letter that you

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1 wrote to the BRE. This is at {KIN00024104}, please.
 2 This is your letter. It's signed by you, isn't it?
 3 A. It is.
 4 Q. To Debbie Smith at BRE, 23 October 2020. Let's look at
 5 it together. In the first paragraph, you write:
 6 "We are writing to you with reference to a number of
 7 BS 8414 test reports and corresponding classification
 8 reports featuring our product Kooltherm K15 ... which
 9 Kingspan will formally be withdrawing from circulation.
 10 As you may be aware, Kingspan is currently involved
 11 as a core participant in the Grenfell Tower Public
 12 Inquiry. As part of our co-operation with requests for
 13 information from the Inquiry we have undertaken a
 14 comprehensive review of all past and current test data
 15 which relates to K15, including BS 8414 tests.
 16 "Through our review we have now concluded that tests
 17 carried out in 2005 and 2014 featured product that was
 18 not sufficiently representative of the product currently
 19 sold into the market place. We have listed these
 20 reports and a small summary of their construction build
 21 ups below."
 22 Now, you say there in that paragraph, "we have now
 23 concluded". When exactly was that conclusion reached?
 24 A. I think that would have been around February.
 25 Q. February in which year?

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1 A. 2019.
 2 Q. Are you sure about that? Let's look at it together
 3 again. This is the letter of 23 October 2020 --
 4 A. Yes.
 5 Q. -- Mr Pargeter. The third paragraph:
 6 "Through our review we have now concluded ..."
 7 A. Ah, okay.
 8 Q. I was wondering, when was that conclusion reached?
 9 A. I think once we'd completed the replica tests, that's
 10 when we understood that.
 11 Q. Now, the replica test you're referring to, is that the
 12 2019 test?
 13 A. Yes, that's correct.
 14 Q. And you got your test report back from that, I think, in
 15 March 2020.
 16 A. Yes, I believe so.
 17 Q. So just thinking about that chronological detail, did
 18 you come to the conclusion that you refer to here in
 19 March 2020?
 20 A. No, I think we'd come to the conclusion that it wasn't
 21 sufficiently representative of the product sold, that
 22 would have been in February/March 2019, and then we
 23 undertook the testing programme --
 24 Q. In June?
 25 A. -- which went on then, and we had the report then in

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1 February 2020.
 2 Q. So, just to summarise, you become aware of the problem
 3 in 2016, February 2019 you decide to do a test, you
 4 withdraw the test from the website, the old one, you do
 5 the replica test in 2019 on 6 June, that passes, you get
 6 the report in, you say, February 2020.
 7 A. February/March.
 8 Q. So, against that chronology which you have helpfully
 9 laid out for us, when did you form the conclusion that
 10 is identified in the phrase "we have now concluded"?
 11 A. That would have been February 2019, and that's why we
 12 undertook the testing.
 13 Q. Why did you use the word "now" when in fact the
 14 conclusion was some 19 months previous?
 15 A. I think it's just a phrase, really. Because we'd
 16 undertaken the testing ... yeah, it shouldn't have been
 17 "now". We'd established that earlier. I agree.
 18 Q. Why didn't you say, "Through our review we concluded
 19 18 months ago or so that these tests were not
 20 sufficiently representative"?
 21 A. We could have done that, yes, I could have done that.
 22 Q. We know you could have done, but why didn't you?
 23 A. I think it's probably, "We're ready now to advise you of
 24 that", that's probably what I should have written.
 25 Q. What was that readiness to advise you now based on given

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1 the historic --

2 A. Because of the replacement tests we'd got, we could

3 explain the differences and that the testing we had now

4 got --

5 Q. You had the replica test done in June 2019 and the

6 replica test report given to you in February 2020.

7 That's nine months before this letter. So why did you

8 leave it nine months before writing this letter?

9 A. Because we wanted the reports as well. Not just our

10 understanding of it. We wanted the reports.

11 Q. But you had the reports in February, didn't you?

12 A. In February, yes.

13 Q. So between February and --

14 A. Oh, and October.

15 Q. -- October 2020 is about nine months. My question is:

16 why did you leave it nine months before writing this

17 letter to the BRE?

18 A. I think because we just -- we were just so busy, we just

19 didn't really think about writing out to the fire

20 engineers again until about August/September, and then

21 we started to put this letter together then. But

22 I can't explain the gap. It was just busy answering

23 questions to the Inquiry, obviously, and running the

24 business during COVID time, so it was an oversight.

25 Q. Well, an oversight is an insight. If it was

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1 an oversight, it's a pretty grave one, isn't it?

2 A. I don't think it's a grave one. I think, you know, in

3 hindsight I'd like to have done it earlier, I can see

4 that.

5 Q. Well, I'm sorry to pursue this, but withdrawing a test

6 report -- three test reports, but particularly the 2005

7 test report -- which had been the lynchpin, the sheet

8 anchor of your entire marketing for K15 over 18 metres

9 for almost 15 years by this point, given that fact, why

10 was it not of the utmost urgency to make sure that once

11 you at last had the replica test report in your hands in

12 February 2020, you didn't immediately write to the BRE

13 and withdraw it?

14 A. I think it -- like I say, we could have done it earlier,

15 maybe we should have done it earlier, but it didn't

16 change any of the outcomes. It doesn't change anything,

17 the fact that we've done it later than February or

18 March.

19 Q. Is the real reason that you wrote this letter to the BRE

20 that you had been bombarded with questions from

21 the Inquiry, demands for disclosure from the Inquiry and

22 had had to comply, and had come to the realisation not

23 long before 23 October that actually the game was up and

24 it was time you withdrew this report publicly?

25 A. No, the intention was always to write to the

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1 fire engineers about our findings and our repeat

2 testing. It was always the intention.

3 Q. But you haven't got any explanation for why you left it

4 nine months or so before getting round to doing it?

5 A. No, I think just -- it just came back into focus in

6 around August for me personally to bring it up to the

7 team that we should complete this work now.

8 Q. Your third witness statement was of course dated

9 18 September 2020. Is it the case that, during the

10 course of preparation of that statement, it had become

11 apparent to you that you could go on no longer with

12 those three reports in circulation?

13 A. Well, it may have been what prompted me to think about

14 completing the task we'd set about withdrawing it and

15 writing to the fire engineers. It could well have been

16 that.

17 Q. And the reason you used the words, "Through our review

18 we have now concluded" was to give the impression that

19 this was hard work recently done, when in fact you had

20 been sitting on this conclusion for at least nine months

21 and probably 19?

22 A. No, because we know all this information is going to be

23 public anyway, so it wouldn't have been to try and give

24 a false impression, no.

25 Q. Well, you say you know this information was going to be

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1 public anyway; I think that rather makes the point, that

2 you thought you would get in there before you were

3 examined.

4 A. No, I mean, even this letter would be public, would be

5 part of the Inquiry.

6 Q. Do you accept that keeping a BS 8414-1 classification

7 report and test report out there in circulation for any

8 longer than was reasonably necessary was an extremely

9 risky and dangerous thing to do?

10 A. No, I don't think it's -- I don't think it was

11 dangerous. I think, like I say, we've got the

12 confidence in the product and we don't think there was,

13 you know, a vast amount of difference between them. So

14 I don't think it was dangerous in that point of view,

15 but I think, you know, we could have done it earlier

16 than October.

17 Q. I'm bound to suggest to you that whatever your views

18 about the success or failure of the 2019 replica test,

19 you would not have taken the step to write to the BRE

20 unless you were under significant pressure to provide

21 evidence to the Inquiry and felt that you had no other

22 choice. I have to suggest that to you. That must be

23 right, mustn't it?

24 A. I think would we have gone through the test programme

25 without coming to the realisation of what we have in the

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1 sort of control of the product changes, I think that's
2 correct.
3 Q. Well, it took you four years between you first being
4 told of the problem in 2016 by Gwyn Davies and
5 October 2020 to decide to withdraw that test. Do you
6 accept that that is an extraordinarily long time?
7 A. No, not under the circumstances, but that's the fact.
8 Q. And during that entire four-year period, you were
9 selling K15 in the knowledge that the test which
10 underpinned those sales was not the same material that
11 was being sold.
12 A. It is the same material. It's --
13 Q. It's not the same product --
14 A. It's a different --
15 Q. -- produced by the same process.
16 A. -- process, correct.
17 Q. And that was, I have to suggest to you, a dishonest and
18 disreputable way of going about business?
19 A. I don't think it's either of those things.
20 Q. And we see no evidence -- do you accept this? -- that
21 either you or anybody else at Kingspan at any stage took
22 the trouble to alert Arup or Exova or anybody else who
23 had conducted a desktop study in 2014 or 2015 based on
24 the 2005 test that their reliance on that test was
25 misplaced. You just didn't do that either, did you?

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1 A. Not until this letter.
2 Q. No, and why is that?
3 A. For the reasons that we needed to get that evidence to
4 satisfy ourselves if there was any impact and difference
5 between the performance of them.
6 Q. Did it not occur to you that, by permitting the 2005 to
7 remain out there unwithdrawn for people to rely on, you
8 were placing the safety of occupants of buildings with
9 K15 on them at serious risk?
10 A. No, I don't accept that at all.
11 Q. You don't accept that?
12 A. No.
13 Q. Do you agree that this letter rather gives the
14 impression to the BRE, and indeed the Inquiry, because
15 you have copied it to us, that the fact that the K15
16 product tested in 2005 was not representative of the K15
17 product sold from 2006 onwards has only been discovered
18 as a result of your review to assist the Inquiry?
19 A. I think it's the confirmation of it.
20 Q. In fact, as we've seen, the fact that Kingspan changed
21 in 2006 from old to new technology was known from that
22 time, and when you wrote that letter, you knew that.
23 A. Yeah, well, Kingspan were aware that the product had
24 changed, or the process of making the product had
25 changed in 2006, that's correct.

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1 Q. And that the sentence, "Through our review we have now
2 concluded that the tests carried out in 2005 and 2014
3 featured product that was not sufficiently
4 representative of the product currently sold into the
5 market place", was a fact known in 2006 to Kingspan,
6 wasn't it?
7 A. I don't think -- at the time, I personally didn't think
8 it was insufficiently representative of the product.
9 I don't think that -- well, that wasn't my belief, and
10 certainly in terms of its fire performance, no belief
11 that it was insufficiently representative.
12 Q. When did it become insufficiently representative then?
13 A. Like I've mentioned before, really, as part of the
14 Inquiry review, you're looking at things in a different
15 light and under greater scrutiny, and you are
16 overcautious, shall we say, an abundance of caution, we
17 thought it was prudent to withdraw that test.
18 Q. When did you come to the conclusion that, despite
19 knowing about the change from old to new technology, the
20 new technology was not sufficiently representative of
21 the old technology for the purposes of that test? When
22 was that conclusion reached?
23 A. I think that would have been in February 2019.
24 Q. And are you saying that it wasn't your personal view
25 that the product wasn't sufficiently representative?

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1 A. I'm saying prior to that my view was that it wasn't
2 representative, but now I'm taking, you know, advice
3 from the wider team about: does the change in technology
4 and the way we've produced it give a difference that we
5 should acknowledge? And I think obviously the history
6 of the business has been that we didn't need to, but
7 under this scrutiny and, you know, really looking at it
8 in a different light, we've come to the conclusion that
9 we should.
10 Q. I'll come back to the 2014 tests that are referred to in
11 the letter on that page there in the box, but I just
12 want to ask you specifically about the 2005 test for the
13 moment.
14 If we continue with your letter to the BRE, we can
15 see further down the list of build-ups there, and you
16 can see that there you have referred to "Tested
17 Construction"; do you see that?
18 A. Yes.
19 Q. And you refer there to:
20 "Masonry Substrate, 60mm K15 mechanically fixed,
21 aluminium support grid, 40mm Cavity, 6mm UAC cement
22 particle boards ..."
23 Do you see that?
24 A. Yes.
25 Q. You don't put in fibre boards there, do you?

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1 A. No, it's just a section out of the test report, so that
 2 they were aware of exactly what the build-up was.
 3 Q. Now, if you go on to page 2 {KIN00024104/2}, you can see
 4 the heading "Test Report 220876 ..." Here you write:
 5 "Due to the age of this test, a lot of details and
 6 information were hard to come by. The drawings used in
 7 the test report are limited in detail, and the test
 8 report description of the tested construction also
 9 offers little information on the full design of the test
 10 construction.
 11 "On a full review of raw materials and the
 12 manufacturing processes, it became apparent that the K15
 13 manufactured in 2005 would not be representative of the
 14 product currently sold on the market from 2006 to today.
 15 While both products are still phenolic foams, Kingspan
 16 is now of the view that there are sufficient differences
 17 to consider withdrawing this test report."
 18 What were the sufficient differences between the two
 19 phenolic foams that you refer to here?
 20 A. I don't think there are that sufficient difference, but
 21 in terms of the processing of it, I think is what we're
 22 talking about there, there were significant differences
 23 in the way the product is processed.
 24 Q. Well, what were they?
 25 A. Erm --

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1 Q. What are these differences that you say are sufficient
 2 to consider withdrawing this test report?
 3 A. Yeah, I think the one that is -- it's open cell, in
 4 terms of the way the foam is constructed, I believe
 5 it -- old technology was open cell and current
 6 technology is closed cell, which means it basically
 7 retains its thermal performance for longer. But after
 8 that, I'm not -- you know, I'm not a chemist, so I'm not
 9 into the details of that, but I believe that that's the
 10 position.
 11 Q. What were the differences in raw materials that you
 12 refer to?
 13 A. I think there may have been supplier differences on some
 14 of it, different suppliers providing the products.
 15 I don't know the ins and outs on the difference of raw
 16 materials.
 17 Q. When did you find out about those differences?
 18 A. I think it's part of that review undertaken.
 19 Q. Right.
 20 You refer to a review just now, and indeed you refer
 21 to a review here on the page and in the first few
 22 paragraphs of this letter. Was there actually a report
 23 that summarised the findings which then led to this
 24 letter being written?
 25 A. Not that I'm aware of.

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1 Q. So how was this letter generated? You obviously wrote
 2 it yourself, but did you write it from a draft or
 3 a report or --
 4 A. No, it was a draft which was created by me and then the
 5 wider team reviewed the draft, and then that was the
 6 final version that was agreed upon.
 7 Q. What documents did you use to put this draft together?
 8 A. I don't ... just from -- my initial draft was from the
 9 knowledge that I gained, and then the additional wording
 10 was supported by the rest of the team. I don't know
 11 whether there were any specific documents that I used,
 12 it was just, you know, now I've got an understanding of
 13 this is the situation.
 14 Q. I want to ask you about the schedule of tests that you
 15 appended as appendix C to your fourth witness statement,
 16 which was dated 3 November 2020, which postdates this
 17 letter. Can we go to that. In fact, what I want to
 18 show you is {KIN00022357}, which is actually not the
 19 version you exhibited to your statement. What you
 20 exhibited to your statement was in fact revised, and the
 21 document on the page here is, as you can see, updated
 22 and appended to the letter from Gowling WLG dated
 23 31 January 2020. In fact, what you have exhibited is
 24 an earlier version of this schedule, but we're going to
 25 work on the basis of this one.

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1 It I think is supposed to reflect the comprehensive
 2 review that you told the BRE that you had conducted; is
 3 that right?
 4 A. It's certainly a document related to that, yes.
 5 Q. To be fair to you, this is an appendix to Gowling's
 6 letter in response to request 7, paragraph 8 from
 7 the Inquiry, which is about all the tests involving K15
 8 commissioned by Kingspan at the BRE before 14 June 2017.
 9 Were you involved in compiling this table?
 10 A. Not in the direct detail, no.
 11 Q. Who was?
 12 A. I believe that would have been Gwyn Davies, possibly
 13 John Garbutt as well.
 14 Q. Were you involved in providing any of the information
 15 that's gone into this table?
 16 A. Not from what's on that screen.
 17 Q. If we look at the May 2005 test, which is on page 1 in
 18 the second row, you can see the system tested was
 19 "Cement particle board". Do you see that?
 20 A. Yes.
 21 Q. So as at the end of January this year, Kingspan were
 22 still happy with the description of the system tested as
 23 cement particle board. No reference to fibre board
 24 there, is there?
 25 A. No.

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1 Q. Why is that?
 2 A. I just think that's an error.
 3 Q. An error?
 4 A. Yeah, I think it's probably picking up from old
 5 information.
 6 Q. But it's exhibited to your statement. Didn't you check
 7 it before you signed off on it?
 8 A. I missed -- I must have missed that.
 9 Q. Right. Well, when was this compiled, do you know?
 10 A. No.
 11 Q. We know it was in January.
 12 A. Yeah.
 13 Q. Or at some point around the end of January.
 14 A. Yeah.
 15 Q. If we move along the same row to the sixth column under
 16 the heading, "Properties of the tested insulation
 17 product", all we can see there is "Thickness: 60mm", and
 18 then under the column with the heading "Was the tested
 19 insulation product the same as K15 being offered for
 20 sale by Kingspan Insulation Limited at the time?", you
 21 can see it says "Unknown". Do you see that?
 22 A. Yes.
 23 Q. In fact, it was known, wasn't it, at least as at
 24 January 2020, and the answer would be no?
 25 A. Yes, I would agree with that.

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1 Q. So can you account for why it says "Unknown"?
 2 A. No, I can't.
 3 Q. Did you take any care over this document before
 4 exhibiting it to your statement? Did you check it?
 5 A. I checked a lot of documents with the four witness
 6 statements that I've given, and it's obviously just --
 7 I've just missed this.
 8 Q. Let's turn to the BRE's comments in 2015. Can we go to
 9 {BRE00020074}. This is an email chain from Adam Heath
 10 of Kingspan, and if you go to the very end of this chain
 11 on page 1, over to page 2 {BRE00020074/2}, it's an email
 12 from Adam Heath on 8 September 2015 at 15.23, you can
 13 see that, to the BRE, somebody called Vida Gaubsaite,
 14 and he asks her, if you look at the top of page 2:
 15 "Thanks for the prompt response. On a slightly
 16 related topic, it has come up in discussions recently
 17 that we never commissioned a classification report for
 18 our BS 8414-1 test (attached for reference). This test
 19 was originally completed in 2005. I have 3 questions
 20 really;
 21 "Can a classification report be issued for this
 22 test?
 23 "How much will it cost?
 24 "What is the timescale for delivery in the event
 25 this is possible?

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1 "Any guidance you can offer here would be much
 2 appreciated ..."
 3 Now, do you know who instructed Adam Heath to write
 4 this email, send this request?
 5 A. I think we had discussions. Adam had noted that we
 6 hadn't ever seemed to request a 135. He thought it
 7 would be a good idea. I agreed with him, so I asked him
 8 to look into it.
 9 Q. Why did you think it was a good idea?
 10 A. Because we'd got into the practice latterly of, once
 11 we'd got a passed test, was to request the 135
 12 classification, because really the 135 classification
 13 just makes it easier to explain that the test had
 14 achieved the compliance criteria without having to show
 15 people the thermocouple data and that it didn't fail on
 16 the flaming, and so we thought it would be a good idea
 17 to get it for that test just to complete it, for
 18 completeness, really.
 19 Q. Did you ask yourself or did you ask anyone within
 20 Kingspan why there had been no classification report
 21 done either at the time or at any point in the decade
 22 between the test and this email?
 23 A. I wondered why, and probably the only two people who may
 24 have been able to answer that -- well, certainly would
 25 have been Ivor, but he'd gone by then, and maybe Tony,

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1 who had also gone. So I don't think there was anybody
 2 in the -- left in the business who would know the answer
 3 to that question.
 4 Q. But Mr Millichap went in the May of 2015 and Mr Meredith
 5 left, I think, only --
 6 A. August, I think.
 7 Q. -- a matter of days or weeks before this email was sent.
 8 A. Weeks before, yeah.
 9 Q. Did it not occur to you before the 8th or so of
 10 September 2015 to ask yourself the question, "I wonder
 11 where the classification report for this is and why
 12 don't we have one?"
 13 A. No, it didn't.
 14 Q. So what prompted the request at this point?
 15 A. I think just a discussion with Adam. Adam had
 16 identified it. I think we may have been under the
 17 impression that we thought it was unnecessary or it was
 18 expensive, and I said, "Well, let's have a look".
 19 Q. When you were preparing what became the August 2015
 20 routes to compliance document which referred to the
 21 test, as we've seen, the BRE test for the 2005 test
 22 report --
 23 A. Yes.
 24 Q. -- did it not occur to you at that stage to ask the
 25 question, "I wonder where the classification report is

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1 for that?"

2 A. It didn't. It didn't occur to me. It may have been
3 developing that that prompted Adam to think about it,
4 but it didn't occur to me, I can't say.

5 Q. I mean, it's hard to give reasons for why things don't
6 occur to you, but can you explain why it didn't occur to
7 you that you had come in as head of marketing in
8 November 2014, head of technical and marketing in
9 May 2015, and here we are in September 2015, and K15 is
10 being sold all through that time on the basis of a test
11 but without a classification report, the question is:
12 why did it only occur to you at this point,
13 September 2015, that you didn't have and might want to
14 have a classification report?

15 A. I don't know why it only occurred to me then. I mean,
16 it's just the fact that it did occur to me, it was shown
17 to me and I thought it was a good idea to get one.
18 I think they're not -- I don't think they're necessary
19 in order to show compliance of a test, and that's
20 obviously what Kingspan has done over the years, but
21 I just thought it was a good idea when it was pointed
22 out to get one.

23 Q. It's a good idea that would cost money, though, isn't
24 it?

25 A. Yes, it was going to cost some money.

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1 Q. We can see that the request is sent on, if we look up
2 the email chain to page 1 {BRE00020074/1}, by
3 Vida Gaubsaite to Tony Baker on 9 September. Now,
4 you're not in on this email, but let's just have a look
5 at the text. She says:
6 "Dear Tony,
7 "Please, be so kind to [advise] regarding our client
8 request below."
9 Then he comes back the next day, 9 September:
10 "Hi Vida,
11 "This is not a straightforward one; in theory we
12 could issue a classification document, however I can
13 understand why one was not issued for this test as it
14 seems like an indicative type test. BS 8414 and BR135
15 is a system test and classification system and from what
16 I can see from this report, there is no external weather
17 protection system included (e.g. render system or rain
18 screen cladding). Whilst they have a cement board
19 overladding, I doubt this would be considered
20 a complete system. Data such as this has been
21 misrepresented in the market in the past.
22 "I suggest this question should be passed by
23 Steve Howard and/or Debbie Smith before a response is
24 sent."
25 Do you remember receiving a response from the BRE?

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1 A. I don't, I just remember receiving the acceptance that
2 they could do a classification report.

3 Q. Right.

4 A. I wasn't made aware of this sort of background
5 discussion.

6 Q. On what you know, and on what you knew perhaps in
7 September 2015, do you agree with the view that Mr Baker
8 was expressing that the build-up of the 2005 test was
9 not representative of the complete system?

10 A. Well, I think we understood that the cladding on it
11 might not be, but I wouldn't have had any reason to
12 think why that would still preclude a 135 classification
13 report.

14 Q. Mr Meredith gave evidence to the Inquiry -- and it's
15 {Day75/69:20} to {Day75/70:24}, and there is no need to
16 turn it up -- but the gist of his evidence was that this
17 was not supposed to be a cladding system, only supposed
18 to be representative of a non-combustible outer layer,
19 and not representative of a real-life, real-world
20 cladding system at the time.

21 A. I saw that, yes.

22 Q. That's what he said; do you agree?

23 A. I agree that's what the intention seemed to be at the
24 time, yes.

25 Q. As at September 2015, on what you knew then, did you

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1 know at least that much too?

2 A. Well, I knew that the outer cladding was not -- oh, in
3 2015. Did I know then? I knew in 2016. Possibly not
4 2015.

5 Q. Now, let's look at {KIN00004791}, please. This is
6 an email dated 30 May 2005, from Ivor Meredith to the
7 BRE, David Hoare and Sarah Colwell, about the imminent
8 BS 8414 test scheduled for 31 May 2005. This is the day
9 before.
10 Have you ever seen this email before?

11 A. No.

12 Q. You have never seen this before?

13 A. Not that I can recall.

14 Q. Now, I appreciate that this email was generated before
15 you worked for Kingspan.

16 A. Yes.

17 Q. But let's just look at the email a little bit more
18 closely.
19 If you look about two-thirds of the way down, there
20 is a sentence that begins "COSHH data", do you see that?

21 A. Yes.

22 Q. "COSHH data will follow in the morning for the
23 Kooltherm K15 ..."
24 And then it goes on:
25 "... and the 6mm cement board that simulates the

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1 cladding.”
 2 Would you agree that, on what we’ve seen, the
 3 contemporaneous description would indicate that
 4 Ivor Meredith did not consider that the cement board was
 5 genuine cladding, it was a simulation?
 6 A. Yes, it would.
 7 Q. And he wasn’t hiding that fact from the BRE?
 8 A. No.
 9 Q. Was that something that was ever expressed to you?
 10 A. No, I didn’t understand that detail of it.
 11 Q. When you were alerted to the problems with the 2005 BRE
 12 test by Gwyn Davies in the latter part of 2016 --
 13 A. Yes.
 14 Q. -- or perhaps again in 2018, when you say you began to
 15 look at it a little bit more closely, did you not
 16 discover then, at either of those points, that the
 17 cladding was only a simulation?
 18 A. Well, like I say, in 2016 we understood that that cement
 19 particle board was not, you know, a product usually used
 20 in a façade, so that -- so we understood that from then,
 21 yes.
 22 Q. Whether it was cementitious particle or fibre, the idea
 23 was only that it was a simulation and not
 24 a representative system.
 25 A. It appears so from that.

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1 Q. Indeed, and did you discover that fact in 2016 or 2018?
 2 A. That it was a -- no, that it was an intention just
 3 purely to simulate? Not specifically, no.
 4 Q. When did you discover that?
 5 A. I wasn’t aware of the discussions that Ivor had had with
 6 BRE about the extended application that he was looking
 7 to get from this until his evidence the other day, that
 8 was the original intention for this.
 9 Q. So are you telling us that the first time you discovered
 10 that the cladding system used in the 2005 BS 8414 test
 11 was a simulation as opposed to an intended
 12 representative system, or part of a system, was when
 13 Mr Meredith gave evidence?
 14 A. In terms of it was intended as a simulation, and the
 15 discussions he had with BRE about the extended
 16 application, I wasn’t aware of that. But I was aware
 17 that that was a simulation of a system.
 18 Q. When did you become aware that it was a simulation of
 19 a system?
 20 A. Well, when we found out that the -- probably --
 21 I don’t -- when I found out the CP board and the fibre
 22 cement board issue in 2016.
 23 Q. Yes.
 24 A. That’s the earliest I would have understood that.
 25 Q. So as you said earlier, and it’s in your statements, you

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1 started to focus on this question about whether it was
 2 cementitious particle board --
 3 A. Yes.
 4 Q. -- or cement fibre board in 2016, as you have told us.
 5 Was that the same time as you discovered that the system
 6 as tested was a simulation, at least so far as the
 7 rainscreen material was concerned?
 8 A. I don’t recall being aware that it was, you know, an
 9 intended simulation.
 10 Q. Forget intended, because you keep introducing that, and
 11 that’s not in my question. My question -- I think you
 12 have given it to me at {Day83/175:17}, but I think
 13 you’re telling us that you first discovered that the rig
 14 for the 2005 test was a simulation, at least so far as
 15 concerns the outer cladding, in 2016; is that right?
 16 A. Yes, but in reality it actually wasn’t, because in
 17 reality it was a fibre cement board.
 18 Q. Well --
 19 A. So in reality it was a potential real system.
 20 Q. So if --
 21 A. That’s why I say intention. The intention with this was
 22 to -- seems to be to simulate one, but it appears from
 23 the investigations we’ve done that actually the product
 24 he used could actually have been a product that was used
 25 on the outside of a building, potentially.

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1 Q. Given that this is the contemporaneous documentation,
 2 this is the day before the test --
 3 A. Yes.
 4 Q. -- from Mr Meredith, the man at Kingspan responsible for
 5 the test, who describes the 6-millimetre cement board as
 6 a simulated cladding, looking at that now, you have got
 7 no reason to think that that is wrong and that in fact
 8 it was a representative system using a fibre board.
 9 A. Sorry, can you say that question again, please?
 10 Q. Yes. I mean, here is the email from Mr Meredith. He’s
 11 describing the 6-millimetre cement board as a simulated
 12 cladding. He says it simulates the cladding. My
 13 question is: why is he likely to be wrong about that?
 14 A. I don’t think he is wrong. That’s why I say it looks
 15 like that’s what his intention was.
 16 Q. And therefore your understanding that you gleaned in
 17 2016 that it was fibre board and therefore intended to
 18 be representative was wrong?
 19 A. No, I didn’t say it was intended to be representative,
 20 it’s just that that appears to be what board was used,
 21 but it could still be -- I mean, really you could have
 22 used any non-combustible façade product to simulate how
 23 the system would perform using K15, whether it be
 24 a product which is generally used on the market or not.
 25 Q. When you were told by Mr Davies about the discrepancies

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1 or oddities about the rainscreen material, did you seek
 2 to have a discussion with Philip Heath about that?
 3 Because he was still at Kingspan at the time, wasn't he?
 4 A. He was, but I didn't, no, I didn't seek to go any
 5 further with Philip.
 6 Q. So you left the discrepancy between old K15 and new K15
 7 and you left the discrepancy between the cementitious
 8 cladding board and the fibre board; can you account for
 9 your apathy at the time?
 10 A. I wasn't apathetic, I just came to, you know, the
 11 conclusion that, from the information I'd had, there
 12 was, you know, nothing to be concerned about in terms of
 13 the fire performance of the product or the system.
 14 Q. Had you done a documentary exercise of examining in the
 15 records what exactly was used by way of the cladding
 16 system, you would have come across this email in the
 17 records and found out that, as Mr Meredith writes here,
 18 it was 6-millimetre cement board simulating the
 19 cladding; that information was within your reach at the
 20 time.
 21 A. Potentially.
 22 Q. Well, that's why I'm afraid I used the word "apathy".
 23 It's the only way of explaining why you didn't actually
 24 undertake an investigation to find out exactly what it
 25 was that had been used and why.

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1 A. Well, I think obviously these documents have been pulled
 2 up because of, you know, intensive document searches.
 3 I possibly could have gone back through all of Ivor's
 4 emails, but I didn't see any need to do that.
 5 Q. Well, you have said you could have done, and I suggest
 6 to you you should have done; do you accept that?
 7 A. No, I don't.
 8 Q. You don't?
 9 A. No.
 10 Q. So you remain of the position, do you, that it was
 11 perfectly acceptable to leave this doubt about what the
 12 rainscreen cladding system was, whether it was
 13 representative or not, whether it was a simulation or
 14 not, and whether K15, new or old?
 15 A. Well, I don't think finding out that it was intended as
 16 a simulation actually changes what I understood of the
 17 test in 2016.
 18 Q. Well, it would, wouldn't it, because it would tell you
 19 that the test undertaken in 2005 was on any view not
 20 a test which, if replicated, could be used by a real
 21 builder in the real world on a real building?
 22 A. And I think in 2016 understanding that it had been
 23 described as a cement particle board probably would --
 24 I'd have agreed with that.
 25 Q. I want to ask you now about the July 2014 BS 8414 test

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1 that was undertaken at the BRE.
 2 SIR MARTIN MOORE-BICK: Mr Millett, are we going to
 3 a slightly different topic?
 4 MR MILLETT: Yes, Mr Chairman, that's a good moment.
 5 SIR MARTIN MOORE-BICK: I think it might be a good idea for
 6 a break.
 7 We will stop now and return, please, at 3.35. And
 8 again, no talking to anyone about your evidence.
 9 THE WITNESS: Of course.
 10 SIR MARTIN MOORE-BICK: Thank you.
 11 (Pause)
 12 Thank you. 3.35.
 13 (3.20 pm)
 14 (A short break)
 15 (3.35 pm)
 16 SIR MARTIN MOORE-BICK: Right, ready to carry on,
 17 Mr Pargeter?
 18 THE WITNESS: I am.
 19 SIR MARTIN MOORE-BICK: Thank you.
 20 Yes, Mr Millett.
 21 MR MILLETT: Thank you, Mr Chairman.
 22 Mr Pargeter, I'm going to take a step out from going
 23 to the July 2014 test and I want to ask you just
 24 a little bit more about what Gwyn Davies might have told
 25 you in 2016 when you had the discussion about old K15

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1 and new K15.
 2 Can I ask you to go, please, to {KIN00008847}. Now,
 3 this is a report dated 7 January 2008, signed by
 4 Ivor Meredith. If you go down in it to page 5
 5 {KIN00008847/5}, there is the background to the test,
 6 and in the second paragraph there you can see that there
 7 is a description of what the test is, and the use of the
 8 non-combustible board.
 9 Then on page 6 {KIN00008847/6} you can see that
 10 there's the detail here of the tested system. You see
 11 that?
 12 Then if you go down a little bit further, past the
 13 photographs to page -- well, I probably want page 3
 14 {KIN00008847/3}, actually, in the first place, and we
 15 will come to some photographs if we need them.
 16 If you go to page 3 {KIN00008847/3} at the top of
 17 the page, you can see that the report says:
 18 "The Phenolic was burning on its own steam and the
 19 BRE had to extinguish the test early because it was
 20 endangering setting fire to the laboratory.
 21 "Why did it fail."
 22 "The new technology Phenolic is very different in
 23 a fire situation to the previous technology which has
 24 passed several similar tests. The old technology would
 25 turn into a light ash and fall away leaving [no]

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1 substance to feed the fire . Please refer to the Archive
 2 test pictures 47 and 48 which clearly shows this .”
 3 Those are lower down in the report:
 4 "The phenolic Burnt very ferociously and gave the
 5 top cavity barrier a serious hammering. It did however
 6 hold out and there was a slim chance that it may have
 7 held out long enough for the crib to start burning down
 8 and then this test would have been successful.”
 9 If you look a little bit lower down that page in the
 10 last two paragraphs, it says:
 11 "Comments from the BRE:
 12 "The official line: - It's a system failure no
 13 individual component can be solely held responsible for
 14 the failure .
 15 "However (unofficial comments) it was apparent that
 16 the insulation was fully involved in the test . Surface
 17 spread of flame was apparent and the core continued to
 18 burn when the flame source had been extinguished. They
 19 stated they did not remember the product performing like
 20 that last time.”
 21 Now, this report is discussed at a meeting at which
 22 Mr Davies was present. If we can just look at that,
 23 {KIN00022466}, where we can see on 30 January 2008,
 24 present: Vince Coppock, Gwyn Davies, Phil Heath,
 25 Ivor Meredith and others. Do you see that?

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1 A. Yes.
 2 Q. "Urgent Topics for Discussion.
 3 "1. Phenolic fire performance.”
 4 And you can see, "Metsec façade test failure ”; do
 5 you see that?
 6 A. Yes.
 7 Q. I'm not asking you to tell me what was in Mr Davies'
 8 mind in 2016, eight years later , but given what I've
 9 shown you in this report, did Mr Davies discuss this
 10 report or anything like this with you when, in 2016, he
 11 told you that the 2005 test had been carried out with
 12 old technology?
 13 A. No.
 14 Q. Have you ever seen this test report -- not the document
 15 on the screen, the document I've just referred you to --
 16 before?
 17 A. No, I saw it referenced in evidence earlier .
 18 Q. Right.
 19 A. But not before --
 20 Q. Is that the first time you --
 21 A. Yes.
 22 Q. That's the first time you had seen it .
 23 Can you be absolutely sure that you never had
 24 a discussion with Gwyn Davies along the lines that the
 25 new technology burnt ferociously and contributed to the

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1 fire when subjected to an 8414 test?
 2 A. No, I didn't .
 3 SIR MARTIN MOORE-BICK: Can you just help me with this,
 4 then: you told us earlier that you had understood that
 5 there was no material difference between the reaction of
 6 the new product to fire and the reaction of the old
 7 product --
 8 A. Yes.
 9 SIR MARTIN MOORE-BICK: -- old tech, to fire . How did you
 10 form that view?
 11 A. Just by -- I had discussions with Gwyn about the
 12 changes, the differences , and that, you know, Gwyn --
 13 I understood from Gwyn that the fire performance in
 14 terms of its -- what we would test in the lab or its
 15 Euroclass was the same as the product we were
 16 manufacturing in 2016.
 17 SIR MARTIN MOORE-BICK: That is a little surprising, given
 18 the fact that, as we can see --
 19 A. Yes.
 20 SIR MARTIN MOORE-BICK: -- from this document, Gwyn Davies
 21 clearly did know that at least in the view of
 22 Ivor Meredith there was a significant difference in the
 23 way the products performed. And he didn't mention
 24 anything of the sort to you?
 25 A. No. But this is 2008. I'm not sure whether Gwyn was of

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1 the opinion that there was a significant difference at
 2 the time. These are system tests , and how much
 3 proportion you can give to the performance of the
 4 insulation versus the performance of the system is
 5 favoured in the system performance rather than the
 6 insulation , so -- and we can see there that, you know,
 7 the same test with a mineral wool had failed . So it
 8 would indicate to me, and possibly to Gwyn, but I'm
 9 putting words in his mouth and his mind, that it was
 10 more the system was the problem with the performance
 11 than the K15 itself .
 12 SIR MARTIN MOORE-BICK: Well, I do understand that it's
 13 a system test .
 14 A. Yes.
 15 SIR MARTIN MOORE-BICK: But Mr Meredith did draw attention
 16 to certain characteristics of the new technology
 17 reaction to fire , but you say Gwyn Davies didn't mention
 18 that to you at all?
 19 A. No, no. In 2016, the test that I observed, it didn't
 20 get, you know, sustained burning, it did self-extinguish
 21 when the source was removed, so it just didn't seem
 22 to -- it doesn't seem to tally with that description at
 23 that time as I now look at it . But also I understand
 24 from Ivor's evidence that he wasn't at that test, and
 25 that -- I think he said himself he was overinflating the

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1 performance to get a reaction from the team to look
 2 closely. So I believe he thought there was a difference
 3 in the performance, but he couldn't, to me, seem to be
 4 able to quantify that it was the K15 as opposed to the
 5 system. That's looking back on it now.
 6 SIR MARTIN MOORE-BICK: Thank you.
 7 MR MILLET: What you have just told us is a comment now
 8 from where you're sitting --
 9 A. Yes, yes, yes.
 10 Q. -- a few weeks ago. Right.
 11 Can I then show you one more document on this line
 12 and then we will go back to where we were, which is
 13 {KIN00008843}. This is an email run from the summer of
 14 2008, and if I ask you to go to page 2 {KIN00008843/2}
 15 and then over to page 3, at the bottom is an email from
 16 Ivor Meredith to Malcolm Rochefort, Vincent Coppock,
 17 Philip Heath and Gwyn Davies, "K15 Problems":
 18 "Malcolm, Vincent ..."
 19 And over to the top of page 3 {KIN00008843/3}, he
 20 says:
 21 "The question of K15's bad fire performance is no
 22 longer just an internal one. It would seem Offsite had
 23 a very dramatic test failure .
 24 "Therefore I need to know how soon I can have
 25 samples of the OP90 Phenolic for [business] critical

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1 R&D.
 2 "Once I have [reviewed] the information I will
 3 provide a more comprehensive report later however the
 4 attached picture shows the most recent K15 test
 5 performed by Offsite and K15 burning under its own steam
 6 [in bold] 10 minutes after the test was put out.
 7 Offsite are gravely concerned that we are selling
 8 something that doesn't do what we say it does."
 9 Now, that email is something which was sent to
 10 Gwyn Davies.
 11 At any time -- any time -- during your tenure
 12 overseeing K15 from the latter part of 2013, end of
 13 2013, did Gwyn Davies ever tell you about the history of
 14 K15 and these apparently dramatic failures?
 15 A. No, not that I recall .
 16 Q. Not a single word?
 17 A. No.
 18 Q. Do you have any reason to think that he might have kept
 19 that from you?
 20 A. No, I can only put it down to whether he believed it was
 21 the K15 product at the time, and there has been,
 22 you know, improvements and developments on the product
 23 as outlined in the changes, and whether there was a view
 24 this might have been a bad batch. But I think actually
 25 the view is that there wasn't a significant difference

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1 in performance of the product.
 2 Q. But if the context of your discussion with Mr Davies in
 3 the latter part of 2016 was, as you have told us,
 4 testing of the K115 --
 5 A. Yes.
 6 Q. -- against the original K15 test --
 7 A. Yes.
 8 Q. -- you're looking at a comparison between that test and
 9 the new test, or potential new test --
 10 A. Yes.
 11 Q. -- can you explain why Mr Davies wouldn't have said to
 12 you, "Well, the old technology under the K15 test in
 13 2005 was radically different from the performance of
 14 anything we tested after 2006 when we started selling
 15 new technology"? He might have added "and things have
 16 got better since", but why wouldn't he have told you
 17 that?
 18 A. Well, because I'm not sure he's of that belief, I would
 19 imagine.
 20 Q. But you, sitting there, have no reason to suggest for
 21 why he would have kept any of this from you?
 22 A. No.
 23 Q. Right.
 24 Can we then turn to the July 2014 test, which was
 25 undertaken at the BRE.

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1 Now, it's right, isn't it, that that test was the
 2 subject of BRE's report number 297999, which I think you
 3 also withdrew in your 23 October letter?
 4 A. That's correct.
 5 Q. Yes, I've got the number wrong: 297099. That's right.
 6 Now, that was the third of the tests withdrawn.
 7 At the time of that test, July 2014, you were
 8 Kingspan's product development manager, weren't you,
 9 July 2014?
 10 A. Yes.
 11 Q. You hadn't yet been promoted to head of technical .
 12 A. No, that's correct.
 13 Q. Or head of marketing.
 14 You say in your third witness statement on page 28
 15 {KIN00022610/28}, if we can just go to that, please, at
 16 paragraph 3.38, that you were in charge of developing
 17 the research and development product which was used in
 18 the July 2014 test; is that right?
 19 A. No, I don't say I was in charge.
 20 Q. Right.
 21 A. I say I was the --
 22 Q. Well, you were the product development manager and were
 23 involved in the project to develop low lambda K15.
 24 A. That's right, I was involved in that project, yes.
 25 Q. I see.

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1 What did you know about the fire characteristics of
2 that product before the test?
3 A. Well, I understood the -- oh, before the test? Probably
4 before the test I wouldn't have had any understanding,
5 I don't think, of the fire performance. I know from
6 when I started to look at it, I think it was September
7 in that year, after the test had been completed, that
8 looking at the data from the small-scale, we weren't
9 expecting it to be any different than the standard
10 product.
11 Q. Would you agree that tests to BS 8414 require
12 significant planning?
13 A. Yes.
14 Q. And require significant investment, both in terms of
15 management time and cost?
16 A. Yes.
17 Q. And in July 2014, were you aware that Kingspan were
18 actually under some pressure, both from the NHBC -- do
19 you remember? -- and from a customer, or potential
20 customer, called Wintech, to provide evidence of
21 successful tests to BS 8414-2, steel frame, for K15?
22 A. Yeah, I think was it November 2014, around that time,
23 I became aware of that.
24 Q. I think it was earlier than that, in fact, January.
25 A. 2014?

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1 Q. 2014, yes.
2 A. Possibly. I was aware that the NHBC were putting
3 difficult questions in to the team about their intention
4 potentially to stop recommending K15 on projects.
5 Q. Yes. All right. And you were aware of that by July of
6 that year?
7 A. Yes.
8 Q. Were you also aware by July 2014 that no tests on
9 systems incorporating the standard new tech K15 had yet
10 been able to meet the criteria in BR 135?
11 A. I don't think I was aware of the -- what test bank of
12 evidence we'd have had on the standard product.
13 Q. Right. We can do this via appendix B of your fourth
14 witness statement, if need be, but if I can summarise it
15 for you, it may be easier.
16 Do you remember at the time that, before July 2015,
17 there had been four tests: in 2007 and 2008, two with
18 Sotech and Metsec, one on 7 January 2014 and one on
19 19 March 2014, all unsuccessful?
20 A. Possibly not in 2014, no.
21 Q. In preparing for the July 2014 8414 test, did you not
22 yourself just go back through the files and work out
23 what 8414 tests had been conducted on K15?
24 A. No, and I guess that test was already undertaken before
25 I was asked to look at the timing programme, to become

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1 the project manager on that, that test was already done.
2 So I was asked, I think it was in the September, to look
3 at completing the programme to launch the product. So
4 I think it was -- the confidence from the passing of
5 that test moved it to the next stage in the stage-gate
6 process, if you like.
7 Q. It's right, isn't it, that in fact the K15 tested in
8 July 2014 was not the same as that being offered for
9 sale at the time?
10 A. That's correct.
11 Q. Why was that?
12 A. Because it was a development project.
13 Q. What was the point of testing a version of K15 that was
14 not for sale?
15 A. Because there was the intention to move to a lower
16 lambda Kooltherm range, and K15 was part of that move.
17 Q. Now, we know that that test passed in July 2014. Do you
18 accept that, to your knowledge at the time, Kingspan
19 then used that test pass to sell standard K15?
20 A. Knowledge at the time? No.
21 Q. Right, we'll come back to that.
22 We know that you withdrew this test, the July 2014
23 test, you withdrew that report in October this year
24 along with the test for the 2005 test.
25 What was the point of doing that for the July 2014

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1 test?
2 A. Because it was on a development product, so it had got
3 a different blowing agent and it had got a different
4 facer thickness.
5 Q. Yes. I understand that it was on a development product,
6 or project, but why withdraw it, unless it had been out
7 there being used?
8 A. So I was aware in 2019 that we'd been relying on that
9 test, I just wasn't aware in 2014.
10 Q. Let's see how we go with that.
11 Can we go to your first witness statement at page 12
12 {KIN00000494/12}, please, and look at paragraph 4.13.
13 Now, you say there:
14 "As at the Supply Date, Kingspan had commissioned
15 BS 8414 test and classification reports for the
16 following BS 8414 tests of systems incorporating K15."
17 We looked at (a) earlier, that's the 2005 test, and
18 if you go over the page {KIN00000494/13} to
19 subparagraph (c), we can see that there's the July test;
20 yes?
21 A. Yes.
22 Q. That's the July 2014 test, and it's described there as:
23 "BS 8414 Part 2:2005 Test on a Kingspan K15
24 insulated system with a ventilated Terracotta tile
25 rainscreen (Test Report Number 297099). The system

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1 included K15 with a Taylor Maxwell Standard Classico
 2 tile rainscreen.”
 3 You then go on to say in paragraph 4.14, just below
 4 it:
 5 “The test results at (a) and (c) demonstrated that
 6 these rainscreen cladding systems incorporating K15
 7 achieved compliance with BR 135 and therefore Option B
 8 in paragraph 3.3(b) above.”
 9 Now, option B, just to clarify for everybody else’s
 10 benefit, is the alternative route to compliance using
 11 BS 8414 to BR 135 criteria, isn’t it?
 12 A. Correct.
 13 Q. Yes.
 14 Now, in fact, as I think you now accept by way of
 15 appendix B of your fourth witness statement, signed in
 16 November this year, your reference to K15 in
 17 paragraph 4.13 and 4.14 here of your first witness
 18 statement are misleading so far as concerns this test,
 19 because the K15 tested was not the K15 being sold and
 20 not the same as the one tested in 2005.
 21 A. That’s correct.
 22 Q. Can you explain why your first statement give such
 23 a misleading impression in that respect?
 24 A. I think I was just trying to answer the question about
 25 what was available for information at the time of the

1 fire, and that’s what that was, that’s what it said, and
 2 that’s what it referred to.
 3 Q. Did you know, as I think you did, when you signed this
 4 first statement that the BS 8414 test done in July 2014
 5 was on a research and development product and not K15 as
 6 sold?
 7 A. Yes, I think we knew then, yes.
 8 Q. So why didn’t you make it clear, instead of leading the
 9 reader to believe that there were three tests, including
 10 the one in July 2014, on K15 as sold which had passed
 11 an 8414 test?
 12 A. Like I say, I was just trying to represent what was in
 13 circulation at the time.
 14 Q. Indeed, Mr Pargeter, and what was in circulation at the
 15 time indeed suggested that K15 as sold had passed
 16 a BS 8414-2 test in July 2014.
 17 A. That’s correct.
 18 Q. And this witness statement simply perpetuates that
 19 misleading impression without correcting it, doesn’t it?
 20 A. It wasn’t my intention to perpetuate it.
 21 Q. But it does, doesn’t it?
 22 A. Potentially.
 23 Q. Well, actually, it does, doesn’t it?
 24 A. It wasn’t my intention.
 25 Q. But it does, doesn’t it?

1 A. Yes.
 2 Q. Yes.
 3 If we go to your second witness statement, produced
 4 a year later, let’s see how this goes. We can see at
 5 page 95 {KIN00020824/95}, paragraph 10.35, you then say
 6 there:
 7 “I consider the July 2014 Terracotta Test to be
 8 unusual because of doubts over the thickness of the foil
 9 used.”
 10 Then you go on:
 11 “As far as I can recall, in October-November 2014,
 12 there was a discussion about future K15 BS 8414 tests
 13 and there was some confusion as to what product was used
 14 in the July 2014 low lambda development Terracotta Test:
 15 Ivor Meredith (supported by Malcolm Rochefort) appeared
 16 to have understood that the product used was
 17 solstice-blown K15 using a 50 micron facer which was
 18 perforated on one side and unperforated on the other
 19 side. Gwyn Davies (Kingspan’s Divisional Technical
 20 Processing Director) whose team would have been
 21 responsible for producing the trial product used in the
 22 July 2014 Terracotta Test believed that the product
 23 tested was solstice-blown with a 25 micron unperforated
 24 foil facer (the standard K15 facer thickness).”
 25 Now, what did you believe at the time you wrote this

1 statement? This is your second statement, so
 2 October 2019. What did you believe was being tested in
 3 July 2014?
 4 A. I thought it was more than likely a 50-micron facer, but
 5 I wasn’t sure.
 6 Q. Was there no means of discovery?
 7 A. I think we did -- I think we have confirmed it was most
 8 likely a 50-micron facer, and one thing that tells me
 9 that is that there was an SBI test done on that, which
 10 gave a B rating, which would indicate that the facer was
 11 thicker.
 12 Q. Now, in appendix C of your witness statement, and indeed
 13 in the updated version of that earlier document that we
 14 had earlier, which is {KIN00022357} for the transcript,
 15 we can see that you have recorded the thickness of the
 16 foil as 50-micron. You have opted for that. So you
 17 have gone with the Meredith/Rochefort view as opposed to
 18 the Davies view about thickness.
 19 A. Yes.
 20 Q. Yes, and that’s what you have just confirmed in your
 21 evidence just now.
 22 Either way, there was no uncertainty or doubt, was
 23 there, as to the foam used; it was a solstice-blown
 24 phenolic foam?
 25 A. That’s correct.

1 Q. And that was different on any view from the
 2 blowing agent used in 2005.
 3 A. It's a different blowing agent, yes.
 4 Q. Yes.
 5 If we go to the next paragraph, paragraph 10.36, you
 6 say:
 7 "There appears to be some uncertainty by those
 8 involved at the time as to what exactly was tested but
 9 I understand, regardless, that the product used was
 10 solstice -blown and the test was commissioned as part of
 11 our product development research into a low-lambda
 12 version of K15 during this period. For the avoidance of
 13 doubt, standard K15 sold on the market is non-solstice
 14 blown foam with a 25 micron perforated foil."

15 Again, my question is: why didn't you mention that
 16 in your first statement to the Inquiry?
 17 (Pause)

18 A. Was your previous question about my first statement?
 19 Q. Yes.
 20 A. Ah. I think it didn't come to be confirmed that that
 21 was what we were relying on until -- it would have been
 22 later, and that's why it's in my second witness
 23 statement instead of my first witness statement. That's
 24 what I believe that to be. But in the second witness
 25 statement I understand it was actually on that

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1 development test that was done, and that's where this
 2 information comes through.
 3 Q. No, that's not quite what I was asking you.
 4 What I was asking you was: why didn't you mention
 5 the fact that K15 was in fact non-solstice -blown foam
 6 with a 25-micron perforated foil as opposed to what was
 7 tested in 2005?
 8 A. I don't know why I would have needed to have -- why
 9 I would have done that.
 10 Q. Now, there was also a test in March 2014, wasn't there?
 11 A. March 2014, yes, yes.
 12 Q. And that was terminated early due to flames overtopping
 13 the rig, wasn't it?
 14 A. Trespa test, yes.
 15 Q. And that system was never classified to BR 135 at all,
 16 was it?
 17 A. That's correct.
 18 Q. If we look at Kingspan's schedule of BS 8414 tests
 19 before June 2017, this is at {KIN00022357/3}, we can see
 20 at page 3 you set out the 2014 tests. There is the
 21 March test, and at the top of the table on page 3, there
 22 is also one in January. There again, under "Properties
 23 of the tested insulation product" we can see "Unknown".
 24 Do you know why, as late as this year, the
 25 properties of the tested insulation in that 2014 test

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1 were unknown?
 2 A. No, I can only assume it's been difficult to find the
 3 information for it.
 4 Q. No. After all, at January 2014, you had I think just
 5 about taken over the role of product development
 6 manager, hadn't you?
 7 A. Correct.
 8 Q. And therefore this is modern times. Can you explain why
 9 no record -- well, was there a record kept of what
 10 properties a tested insulation product had?
 11 A. I'm not sure. I'm not sure what records there were.
 12 Q. Are you able to now assist us to fill in the blank about
 13 what the insulation was that was used in that test?
 14 A. I thought we'd already established that it was a similar
 15 trial product.
 16 Q. Right. So it wasn't K15 as sold, whatever else it was;
 17 is that your recollection?
 18 A. That's my understanding.
 19 Q. Right.
 20 Now, can we go to {KIN00021945}, please. This is
 21 a document that was put together by Ivor Meredith, and
 22 it's a PowerPoint presentation. It's called
 23 "Kooltherm K15 - The Façade Insulation Solution,
 24 Strategy Update 18.05.15, Ivor Meredith, Technical
 25 Projects Manager".

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1 Now, by this time, Mr Meredith was essentially
 2 reporting in to a group over which you had supervisory
 3 oversight, didn't you?
 4 A. Correct.
 5 Q. Did you see this document at the time, do you think?
 6 A. No.
 7 Q. Can you explain why that might have been?
 8 A. I can't, no. I don't know what Ivor was doing with
 9 this. I had requested off him the what to do going
 10 forward plan, so whether this was in preparation for
 11 that ...
 12 Q. Right. It's odd, isn't it, that you wouldn't have seen
 13 a document like this, given the reporting structure?
 14 A. I don't know what he did with it.
 15 Q. No, I know, but would it be usual for you not to see
 16 a document such as this produced by Ivor Meredith?
 17 A. Yes, it would, and when I saw this come up on the --
 18 Ivor's witness evidence, because it wasn't in my witness
 19 pack, I asked the legal team to see if we could find
 20 what that was, and they've provided me with a copy of it
 21 since, and then we searched, and Ivor did send this to
 22 me as an email.
 23 Q. Right.
 24 A. But I never opened that email.
 25 Q. Why is that?

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1 A. I don't know. It was sent late at night, I've recorded,
 2 but I don't know why I didn't.
 3 Q. Okay. Well, let's look at it and see how we go.
 4 Can we go to slide 17 {KIN00021945/17}. There's
 5 a table there. It's entitled "Testing to date", and you
 6 can see, if we go down to the January 2014 test, about
 7 three-quarters of the way down, that under the fourth
 8 column, "Formula/Facer", this test is recorded as having
 9 been carried out on 25-micron unperforated; do you see
 10 that?
 11 A. Yes.
 12 Q. Now, standard new technology K15 had a 25-micron
 13 perforated facer, didn't it?
 14 A. It did.
 15 Q. So does the fact that what's described here, 25-micron
 16 unperforated, tell you that this was an R&D product, or
 17 in fact very like old technology, which I think also had
 18 a 25-micron unperforated --
 19 A. I don't think it would have been old technology. We
 20 couldn't have produced that off the line.
 21 Q. Right. So the foam was new tech but the facer was
 22 old tech; is that how to read this?
 23 A. Possibly.
 24 Q. I see.
 25 A. Possibly.

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1 Q. Do you know what the January 2014 test comprised? What
 2 product was being tested?
 3 A. I thought from our investigations that also proved to be
 4 a solstice product.
 5 Q. Right.
 6 A. But it doesn't say there, so ...
 7 Q. Again, can you confirm that this was not the same
 8 product that was for sale to the public?
 9 A. I'm not sure, because I'm looking at other parts of that
 10 where that's -- other things aren't correct as well from
 11 my understanding. The Sotech test's down as ACM, and
 12 I think we've established that that's actually not
 13 correct, they should be aluminium. And the dates, those
 14 Sotech tests don't look right. So I don't -- I can't
 15 tell from that.
 16 Q. Right. Well, can I just push my question again: can you
 17 confirm, looking at this entry for this test, that this
 18 material was not the same product that was for sale to
 19 the public?
 20 A. Only by virtue of the unperforated element, but
 21 I couldn't confirm that.
 22 Q. Right, you don't know.
 23 Do you know why a test might have been being carried
 24 out at this time on a research and development product,
 25 rather than standard K15 being sold?

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1 A. Not unless it was also solstice-blown.
 2 Q. Right.
 3 Can we go back to {KIN00022357/3}, which is the
 4 updated version of appendix C to your fourth witness
 5 statement. The next test listed on that page is
 6 19 March 2014, and that's the one you refer to at
 7 paragraph 4.13(b) of your first witness statement. We
 8 can see, if we look along the columns, that that test
 9 was with a Trespa decorative rainscreen board, and it
 10 was unsuccessful as it had to be terminated early.
 11 If you look at the properties of the tested
 12 insulation, it says:
 13 "Foil: unperforated 50micron or 100micron Foil/5x5
 14 scrim/glass mat.
 15 "Core: R330UF-1. Calcium Carbonate & polyol blend
 16 added. Alternative blowing agent."
 17 Now, is it true that, like the test a few months
 18 later in July 2014, this March test also used a version
 19 of K15 that was not on the market?
 20 A. Correct.
 21 Q. So, again, this was another R&D --
 22 A. Another development exercise, yes.
 23 Q. There's I think dispute about whether the facer was 100
 24 or 50 microns. Is that right?
 25 A. No, I think that's the next test, that dispute.

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1 Q. Right. Is there a record of exactly which it was or do
 2 you not know?
 3 A. In terms of the July 2014 test?
 4 Q. In terms of the March 2014 test.
 5 A. Oh, the thickness says there 50 -- oh, no, 50 or 100.
 6 Q. Foil.
 7 A. Yes. I'm not sure actually whether we have been able to
 8 establish whether it was 50 or 100.
 9 Q. Why is that?
 10 A. I don't know.
 11 Q. Okay.
 12 Now, what is R330UF-1?
 13 A. I don't know, maybe -- it may be the code for solstice,
 14 I'm not sure.
 15 Q. What about the standard K15 phenolic resin, might it be
 16 that?
 17 A. It could be.
 18 Q. You don't know?
 19 A. I'm not a chemist, I'm not into that detail.
 20 Q. Was calcium carbonate and polyol blend, as you can see
 21 there, part of the standard K15 composition?
 22 A. I believe so.
 23 Q. Right.
 24 The alternative blowing agent for that test, do you
 25 know what that was?

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1 A. I think that's probably what the reference to solstice
 2 is .
 3 Q. That's solstice , is it?
 4 A. Yes.
 5 Q. Right.
 6 If we look again at the July 2014 test, bottom of
 7 this page and over to the top of page 4, we can see the
 8 properties of the tested insulation product there are
 9 listed as:
 10 "Foil : Perforated and unperforated 50micron Foil/5x5
 11 scrim/glass mat.
 12 "Core: R330UF-1 Calcium Carbonate & polyol blend.
 13 Alternative blowing agent."
 14 So that again is solstice . So that confirms what
 15 you told us earlier , doesn't it?
 16 A. Yes.
 17 Q. If we go to your second statement at page 96
 18 {KIN00020824/96}, at 10.37 towards the top of the page,
 19 you say:
 20 "In my view, neither the solstice -blown element of
 21 the product used nor the 50 micron unperforated foil
 22 likely impacted the outcome of the July 2014 Terracotta
 23 Test. Looking at the whole product, my understanding is
 24 supported by the two subsequent BS 8414 tests which have
 25 been conducted using terracotta cladding systems and

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1 standard K15."
 2 Then a little bit further down the paragraph you
 3 say, about two-thirds of the way down:
 4 "Both of these tests [this is April 2015 and January
 5 2016] satisfied the criteria of BR 135 and given that
 6 the standard K15 with a 25 micron foil and standard
 7 blowing agent had passed these tests , this eased any
 8 concerns Kingspan may have had as to whether or not a
 9 25 or 50 micron foil was used in the July 2014
 10 Terracotta Test."
 11 Now, it's a little complex, that, but just to
 12 confirm, I'm right, am I, in thinking that you have no
 13 qualifications or education in fire engineering?
 14 A. That's correct.
 15 Q. And you have never worked for a testing house, have you?
 16 A. No.
 17 Q. Or a fire engineering organisation?
 18 A. No, that's correct.
 19 Q. -- overall . No, you haven't.
 20 Now, if Kingspan wanted a desktop study done using
 21 an 8414 test or provide a BR 135 classification opinion,
 22 they wouldn't come to you, would they?
 23 A. No.
 24 Q. So your opinion being expressed in this paragraph here
 25 is not a professional expert opinion, it's just your

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1 private lay opinion.
 2 A. Based on the experience that I've seen of the testing
 3 and the nature of that test , it's based on that
 4 experience, yes.
 5 Q. Was that an opinion you held at the time, that you
 6 express in 10.37?
 7 A. At the time of writing my statement?
 8 Q. No, at the time of the tests .
 9 A. It probably would have been, by the April 2015 test,
 10 because that was the first test that I witnessed.
 11 Q. So you say probably would have been. I mean, you don't
 12 make it clear in your statement that that is the case.
 13 This is intended to be a factual witness statement.
 14 Was it the fact that you held the opinion that you
 15 express in this paragraph at the time of these tests?
 16 A. Erm ... possibly from April 2015 I would have had that
 17 opinion.
 18 Q. But the opinion would have been based on nothing more
 19 than your experience?
 20 A. That's correct.
 21 Q. Did you share that opinion with anybody more expert in
 22 the science than you, or seek to verify it in any way?
 23 A. No.
 24 Q. Did you ask Ivor Meredith or Tony Millichap? After all ,
 25 they were still there in April 2015.

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1 A. No, I wouldn't have done.
 2 Q. Why is that?
 3 (Pause)
 4 A. Because I wouldn't have thought I needed to.
 5 Q. What scientific testing or processes are you referring
 6 to when you say that you don't believe that the solstice
 7 element would react differently in fire from the
 8 standard blowing agent?
 9 A. We've -- since the development of the solstice product,
 10 we have rolled that technology or product out across
 11 other Kooltherm products, just not K15 yet, and K5,
 12 but -- and in those, we're not seeing any improvement in
 13 fire classification from the -- what would be then the
 14 standard technology, or -- so it doesn't add any fire
 15 benefit in terms of the chemistry and the resulting
 16 product testing we need to do.
 17 Q. Yes, that's later, though, isn't it? That's later than
 18 April 2015 and January 2016, isn't it?
 19 A. No, January 2016 I think we'd started to roll it out, we
 20 just hadn't rolled it out for K15.
 21 Q. Yes. So you're relying on experience, perhaps, or
 22 lessons learned later than the time of these tests to
 23 inform the opinion that you say you held at the time of
 24 the test; is that right?
 25 A. No, at the time of the test -- I wouldn't have had

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1 an opinion on the time of the test whether solstice or
 2 the 50-micron facer would have had any difference, at
 3 the time of the test.
 4 Q. Yes.
 5 A. That's my opinion now and from --
 6 Q. Right.
 7 A. -- the date of the witness statements.
 8 Q. Right. Well, that's what I was asking you. This is why
 9 I was at pains to ask you whether this was an opinion
 10 you have now when writing your statement --
 11 A. Sorry.
 12 Q. -- or at the time of the tests.
 13 A. Yes.
 14 Q. You did say it was at the time of the tests, but in fact
 15 I think you've --
 16 A. I've clarified that. So the second test I probably
 17 would have had that opinion from then, but ...
 18 Q. I see.
 19 What testing or processes are you referring to when
 20 you say that the microns or perforations in the foil
 21 would not react differently in fire from the standard
 22 25-micron perforated foil?
 23 A. Just from -- obviously this is my second witness
 24 statement, so more experience, but the fact that the
 25 facer is, you know, effectively just 500 microns

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1 thickness, you know, it's a 40th of a millimetre thicker
 2 than the previous one with aluminium. A large-scale
 3 fire will have no effect when the crib is burning in
 4 excess of 1,000 degrees. If that touches the facer, the
 5 fact that it's 25-micron or 50-micron, it will just
 6 disappear, as we've seen with tests. So that was --
 7 that's based on that logic, and the solstice element
 8 hasn't proven to show any improvement in fire.
 9 Q. But these are rationalisations that you have come to
 10 after the tests, aren't they --
 11 A. Yes.
 12 Q. -- rather than at the time of the tests? Yes, thank
 13 you.
 14 Can we go to {KIN00021810}, please. This is
 15 an email chain in November 2014, and if we go to the top
 16 of page 1, you can see that Ivor Meredith forwards to
 17 you, on 14 November 2014, an email that he had received
 18 by copy from Tony Millichap, which Tony Millichap had
 19 sent to Richard Burnley on 12 November 2014. Can you
 20 see?
 21 A. Yes.
 22 Q. The title is "K15 testing direction", and there is
 23 an attachment, "Official RS 5000 BS 8414" and "Cost
 24 comparison Solstice vs high cost IPC Nov 14".
 25 In the main email, in the fifth paragraph down

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1 towards the bottom of page 1, Tony Millichap says:
 2 "In light of the fact we cannot produce K15 100%
 3 Solstice either commercially or from a production
 4 perspective I would advocate we test the blended product
 5 (once lambda and costs are acceptable, I have included
 6 Malcolm's costs assessment). To revert to testing
 7 standard NT K15 will not support the strategy we are
 8 pursuing with ARUPs and NHBC but will signal a backwards
 9 step with significant consequence.
 10 "The above approach assumes we continue to
 11 acknowledge differences between the tested products
 12 (both blowing agent and facing thickness have
 13 significant impact). All testing has been referenced
 14 back to precise batches with control samples as is
 15 a requirement of BRE however this does not include a
 16 description of the physical differences."
 17 Now, it's right, isn't it, that blowing agent and
 18 facing thickness have a significant impact, don't they?
 19 A. Not at large-scale, but they can have an impact at
 20 smaller scale. Well, the facer can have an impact at
 21 smaller scale.
 22 Q. What was Mr Millichap talking about here, small-scale
 23 tests or large-scale tests?
 24 A. I don't know why he gets the opinion that there will be
 25 a significant difference. I'm not sure what evidence

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1 he's got that opinion of.
 2 Q. Well, did you read this email when you got it from
 3 Ivor Meredith?
 4 A. I don't recall it, but I would have thought I probably
 5 did.
 6 Q. Did you go back to Mr Meredith or indeed contact
 7 Tony Millichap and correct him, and say, "I don't agree,
 8 the blowing agent and facing thickness don't have
 9 a significant impact"?
 10 A. No, I didn't.
 11 Q. No, and I'm assuming you didn't do that because you
 12 didn't think it; is that right?
 13 A. At the time, I probably wouldn't have had -- I hadn't
 14 got the experience I've got now, so I wouldn't have
 15 challenged it necessarily, no.
 16 Q. Well, we find no trace of any response from you in
 17 relation to this email. Can we take it that, had you
 18 disagreed with it, you would have said so at the time?
 19 A. Yes, I probably would have done if I had have thought
 20 about it at the time.
 21 Q. In fact, in relation to blowing agent, facer thickness
 22 and foil perforations, far from not affecting the fire
 23 performance of K15, they are actually an integral part
 24 of it, aren't they?
 25 A. An integral part of the product?

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1 Q. Fire performance of the product.
 2 A. Like I say, yes, at the small scale they will have
 3 an effect .
 4 Q. You're narrowing the answer to small scale and making
 5 this distinction . It 's the case, isn't it , that in
 6 a BS 8414 test to BR 135 criteria , the perforations , the
 7 thickness of the foil and the blowing agent all have,
 8 either together or individually , a significant impact?
 9 A. I don't think the difference between a 50-micron facer
 10 and a 25-micron facer at that scale would have any
 11 difference , and the perforations , I don't think they'd
 12 have any impact at all at that scale .
 13 Q. But nonetheless, even though you say that , and you say
 14 that at paragraph 10.37 of your second witness statement
 15 that we've looked at , you didn't express any
 16 disagreement with Tony Millichap's statement or seek to
 17 qualify him by reference to small-scale tests at the
 18 time?
 19 A. No, that's correct .
 20 Q. I have to suggest to you that the reality is that this
 21 opinion of yours in your second witness statement is
 22 really no more than a defensive position which is not
 23 based in any science?
 24 A. Well, we've also done 13785 testing on both the standard
 25 product and a solstice -blown product to try and see if ,

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1 at that scale , which is , you know, a much lower scale
 2 than an 8414, there's any traceable difference in heat
 3 release , for example, between the two, and that testing
 4 found that I would say they were the same, but actually
 5 the non-solstice -blown product was arguably very
 6 slightly better . So there is some empirical data there
 7 to support that view .
 8 Q. Maybe. But, you see, it 's not necessarily about
 9 empirical data at the molecular level . What we're
 10 talking about is testing in accordance with the
 11 Building Regulations . So you may well have done a 13785
 12 on both the standard product and the solstice -blown
 13 product, but the point is that once you put the
 14 perforated version of a 25-micron or 50-micron
 15 foil faced solstice -blown product into an 8414 test , it
 16 makes a difference , it doesn't perform .
 17 A. No, I'd argue against that , and the 13785 test almost
 18 proves that , that you need -- you cannot detect
 19 a difference at a much lower output of fire . So the
 20 more fire output you put on it , the less likely there's
 21 going to be any type of difference , particularly from
 22 a facer which is , you know, a 20th of a millimetre thick
 23 in aluminium .
 24 MR MILLETT: Mr Chairman, I'm going to turn to another
 25 topic . I'm not terribly confident that I'll finish it

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1 before 4.30.
 2 SIR MARTIN MOORE-BICK: Would it not be sensible to call
 3 a halt there?
 4 MR MILLETT: It would. I'm quite keen to use every minute
 5 that counts with this witness --
 6 SIR MARTIN MOORE-BICK: Well, I know you are.
 7 MR MILLETT: -- but I think this is not a sensible economy
 8 at this stage .
 9 SIR MARTIN MOORE-BICK: I think, for two minutes, it would
 10 be better to stop now .
 11 MR MILLETT: Very well .
 12 SIR MARTIN MOORE-BICK: Well, Mr Pargeter, we'll call it
 13 a day at this point , I think , only a couple of minutes
 14 ahead of what would normally be the finishing time . We
 15 will stop there .
 16 I'm afraid I have to ask you to come back for some
 17 more questions tomorrow .
 18 THE WITNESS: I understand that .
 19 SIR MARTIN MOORE-BICK: But I think that's what you were
 20 expecting .
 21 THE WITNESS: Yes .
 22 SIR MARTIN MOORE-BICK: The only thing I need to tell you
 23 is : please be back to start at 10 o'clock tomorrow
 24 morning .
 25 THE WITNESS: I will .

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1 SIR MARTIN MOORE-BICK: And not to talk to anyone about your
 2 evidence or anything relating to it overnight .
 3 THE WITNESS: I understand .
 4 SIR MARTIN MOORE-BICK: Thank you very much . Would you like
 5 to go with the usher , then , please .
 6 (Pause)
 7 Right, thank you very much . 10 o'clock tomorrow ,
 8 then , please .
 9 (4.30 pm)
 10 (The hearing adjourned until 10 am
 11 on Tuesday, 8 December 2020)

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