



Grenfell Tower Inquiry

Day 86

February 8, 2021

Opus 2 - Official Court Reporters

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Monday, 8 February 2021

1
2 (10.00 am)
3 SIR MARTIN MOORE—BICK: Good morning, everyone. Welcome to
4 today's hearing, which is taking a rather different form
5 from those we were holding before the present lockdown
6 was imposed.
7 Because of the current restrictions, it's not
8 possible for the Inquiry to continue taking evidence at
9 the hearing room in London, even on the basis of limited
10 attendance. Among other things, we have had to take
11 into consideration the risk that that would have imposed
12 on essential staff and of course the witnesses, some of
13 whom would have had to travel a considerable distance to
14 attend the hearing.
15 Our work is, however, urgent, and we have therefore
16 made arrangements to conduct our hearings remotely while
17 the current restrictions remain in place. How long that
18 may be we don't know, but we are determined to resume
19 normal working arrangements as soon as it is safe to do
20 so.
21 I'm sorry it's taken a little while for us to put in
22 place these arrangements, but they're much more complex
23 than you might think, and we are very grateful to the
24 technical support team for enabling us to resume in this
25 way.

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1 You should know that each member of the Inquiry team
2 taking part in the hearings is working from a separate
3 location, but with the help of our technical support
4 staff from RTS and Opus, we are all able to see and hear
5 what is going on and to take part in the proceedings,
6 just as we did when we were all together in the hearing
7 room.
8 We all understand that taking evidence in this way
9 lacks some of the important qualities of a hearing at
10 which the witnesses and counsel are physically present
11 and face each other across the room. However, the style
12 of questioning will remain the same, and we shall expect
13 the witnesses to help the Inquiry to the best of their
14 ability.
15 We also recognise that there may be technical
16 problems from time to time. We hope that there won't
17 be, but if there are, we ask those attending the
18 hearings and those watching them to bear with us while
19 they're resolved. We are greatly indebted to RTS and
20 Opus for making it possible for us to continue our work
21 in this way, enabling us thereby to avoid an even longer
22 delay.
23 Well, as usual, I'm joined here by my fellow panel
24 members, Ms Thouria Isthephan and Mr Ali Akbor.
25 MS ISTEPHAN: Good morning.

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1 MR AKBOR: Good morning.
2 SIR MARTIN MOORE—BICK: As I'm sure you're all aware,
3 conducting a virtual hearing poses certain technical
4 challenges for everyone involved, including those on
5 whom we depend for our support. I shall be grateful,
6 therefore, if those of you who are not active
7 participants, which in normal circumstances will include
8 the witnesses' legal representatives, would keep your
9 cameras and microphones switched off at all times,
10 unless of course for some reason you think it necessary
11 to intervene.
12 Well, with that preamble, we can now meet today's
13 witness, who is Mr Andrew Pack, an employee of Kingspan.
14 MR ANDREW PACK (called)
15 SIR MARTIN MOORE—BICK: I'm going to ask Mr Pack: are you
16 there?
17 THE WITNESS: Good morning, yes, I am.
18 SIR MARTIN MOORE—BICK: Good morning. Can you hear me and
19 can you see me clearly?
20 THE WITNESS: Yes, I can.
21 SIR MARTIN MOORE—BICK: Good, thank you very much.
22 Now, can I ask you: do you have the words of the
23 affirmation on the screen in front of you?
24 THE WITNESS: No.
25 SIR MARTIN MOORE—BICK: Well, if we wait a little bit,

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1 I think they'll come up. You are giving evidence from
2 Dubai, aren't you? So there may be a very short time
3 delay.
4 The affirmation I think is now on the screen, is it?
5 THE WITNESS: Yes, correct, it has appeared now.
6 SIR MARTIN MOORE—BICK: Good. Would you please make the
7 affirmation by reading the words you see there.
8 (Witness affirmed)
9 SIR MARTIN MOORE—BICK: Very good, thank you very much.
10 Now, there are one or two things I need to deal with
11 before you actually start giving your evidence.
12 Can you confirm that you are alone in the room from
13 which you are giving evidence?
14 THE WITNESS: Correct.
15 SIR MARTIN MOORE—BICK: Thank you.
16 Can you confirm that you have no documents or other
17 materials with you?
18 THE WITNESS: Correct.
19 SIR MARTIN MOORE—BICK: Thank you.
20 Can you confirm that your mobile phone is in another
21 room, and you have no other electronic device in the
22 room which is capable of receiving messages?
23 THE WITNESS: Correct.
24 SIR MARTIN MOORE—BICK: Thank you very much.
25 Now, for your own peace of mind, you might like to

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1 know that your legal representatives are in the virtual
 2 hearing room and will be following your evidence. They
 3 can intervene if they consider it necessary to do so,
 4 but otherwise, as I think you have heard, I've asked
 5 them to keep their microphones and cameras switched off.
 6 All right?
 7 THE WITNESS: Okay.
 8 SIR MARTIN MOORE—BICK: I hope we shan't have problems with
 9 sound or vision, but if we do, we will take a short
 10 break while the technical team resolves them, and I'll
 11 make that clear to you.
 12 If for any other reason you need to attract my
 13 attention, will you please indicate in some appropriate
 14 way?
 15 THE WITNESS: Yes.
 16 SIR MARTIN MOORE—BICK: All right.
 17 We are planning to have a short break roughly
 18 halfway through the morning at about 11.15. If you need
 19 an additional break at any time, please indicate and
 20 we'll do what we can to accommodate you. Okay?
 21 THE WITNESS: Mm—hm.
 22 SIR MARTIN MOORE—BICK: While I mention that, can I mention
 23 something else: once you have started giving your
 24 evidence, it's very important that you don't discuss
 25 your evidence or anything relating to it with anyone

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1 else until you have completely finished. I will try to
 2 remember to remind you of that when we have a break, but
 3 if I fail to do so, please bear it in mind nonetheless.
 4 Now, before we actually start the questions, do you
 5 have any questions yourself or is there anything you
 6 wish to bring to my attention?
 7 THE WITNESS: No, I'm fine, thank you.
 8 SIR MARTIN MOORE—BICK: Good, thank you very much.
 9 At that point, therefore, I'm going to invite
 10 Ms Troup to ask you some questions.
 11 Yes, Ms Troup.
 12 Questions from COUNSEL TO THE INQUIRY
 13 MS TROUP: Good morning, Mr Pack.
 14 Before I start, could you confirm, please, that you
 15 can see and hear me clearly?
 16 A. Yes, I can, thank you.
 17 Q. Can I start then by thanking you for attending the
 18 public inquiry to give your evidence. It is very much
 19 appreciated.
 20 During the course of the day, if you have any
 21 difficulty at all understanding any of the questions
 22 that I ask you, please just say so and I'll repeat the
 23 question or put it in a different way.
 24 A. Okay.
 25 Q. The other thing I'm going to ask you to do is try to

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1 keep your voice up so that the transcriber, who is also
 2 on the call, can take down all of your evidence as you
 3 speak. Does that make sense?
 4 A. Yes, it does.
 5 Q. And then, last, just again so that the transcriber can
 6 record all of your answers, please try to ensure that
 7 you don't nod or shake your head in response to
 8 questions, but instead say yes or no.
 9 A. Okay.
 10 Q. Was all of that clear?
 11 A. Yes, it is.
 12 Q. Right.
 13 Mr Pack, you have provided a witness statement to
 14 the Inquiry, and your statement, if we can get that up
 15 on the screen, please, is at {KIN00008702}.
 16 If we could go to page 53 of that statement, please,
 17 we can see that the date of the statement at the very
 18 bottom is 19 September 2019; yes?
 19 A. Yes.
 20 Q. And there is a signature there too. Is that your
 21 signature?
 22 A. Yes, it is.
 23 Q. Have you read your witness statement recently?
 24 A. Yes, I have.
 25 Q. Can you confirm that the content of your witness

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1 statement is true and accurate?
 2 A. Yes, I can.
 3 Q. Have you discussed your statement or your evidence with
 4 anyone before attending today?
 5 A. No, I haven't.
 6 Q. Thank you.
 7 To start, I'm going to ask you some questions about
 8 your background.
 9 So, staying with your witness statement, if we can
 10 go back up to page 2 {KIN00008702/2}, I think. I'm
 11 paraphrasing, but from your witness statement
 12 I understand that you have been working for Kingspan
 13 since 1992; is that right?
 14 A. That's correct.
 15 Q. And your current role is as global technical support
 16 manager; yes?
 17 A. That's correct.
 18 Q. In terms of reporting structure, I think you report now
 19 to the Middle East division.
 20 A. Yes.
 21 Q. Right.
 22 Looking at page 2 of your witness statement, and in
 23 particular at paragraph 2.1, you mention there that you
 24 have a Higher National Diploma in building studies; is
 25 that right?

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1 A. Yes.
 2 Q. Do you have any qualifications relating to
 3 fire engineering?
 4 A. No.
 5 Q. You also say, if we go down to paragraph 2.3 — it's on
 6 the same page — and again I'm paraphrasing, that
 7 technical roles such as yours are very much learned on
 8 the job and that that was the case for you; is that
 9 right?
 10 A. That is correct.
 11 Q. Then if we move over to page 3 {KIN00008702/3}, and look
 12 at paragraph 2.4, looking there at the first and second
 13 lines, we understand from that that your very first role
 14 for Kingspan in 1992 was as a technical adviser; yes?
 15 A. Yes.
 16 Q. Then, at some point prior to 2001, you were promoted
 17 into the role of senior technical adviser.
 18 A. Yes.
 19 Q. Is it correct for me to say that throughout that period,
 20 so from 1992 to 2001, you reported directly to
 21 Philip Heath?
 22 A. Yes.
 23 Q. If we go down, then, to page 4 of your witness statement
 24 {KIN00008702/4}, and to paragraph 2.8, you say in the
 25 first line:

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1 "Then from 2001 to 2010 I was classed as the
 2 Technical Services Manager."
 3 Was that a promotion from your previous role as
 4 senior technical adviser?
 5 A. Yes, it was.
 6 Q. And you remained in that role until sometime in 2010; is
 7 that right?
 8 A. Yes.
 9 Q. Again, throughout that period, so in fact overall from
 10 1992 until 2010, you reported throughout directly to
 11 Philip Heath; is that right?
 12 A. Yes. Yes.
 13 Q. Going over now, please, to page 5 {KIN00008702/5}, and
 14 to paragraph 2.15, towards the bottom of the page, you
 15 say that in 2010 your focus moved away from the UK into
 16 emerging markets, although you retained the title of
 17 technical services manager until 2014; yes?
 18 A. That's correct, yes.
 19 Q. Then looking at the third line of paragraph 2.15, just
 20 about halfway through that line, you say:
 21 "I did not get involved in UK enquiries relating to
 22 K15 from 2010 onwards."
 23 Is that correct?
 24 A. That's correct, yes.
 25 Q. Moving on, I want to ask you now about any training you

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1 received during the period 2001 to 2010, and about your
 2 understanding of the regulatory framework relating to
 3 the use of phenolic foam in the building industry.
 4 So, thinking about that period from 2001 to 2010,
 5 did you ever attend any training on the
 6 Building Regulations?
 7 A. No.
 8 Q. I'm sorry, I didn't catch that answer.
 9 A. No.
 10 Q. Thank you.
 11 Did you attend any training during the same period,
 12 2001 to 2010, on the practical guidance in Approved
 13 Document B?
 14 A. No formal training, no.
 15 Q. No formal training, thank you.
 16 If we can go, please, to page 14 of your witness
 17 statement {KIN00008702/14}, which should still be up on
 18 your screen, and to paragraph 4.23, I just want to read
 19 from that with you from about halfway through the second
 20 line beginning, "The whole department"; do you see it?
 21 A. Yes, I do.
 22 Q. You say there:
 23 "The whole department was aware that once you got
 24 over 18m, you had to look to the appropriate sections of
 25 Approved Document B at the time, which obviously gave

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1 alternative routes to compliance, for example, BS 8414
 2 testing. Everyone was aware that the use of combustible
 3 insulation above that height was subject to further
 4 guidance. It was always something I have been aware of
 5 and that the Technical Advisors at the frontline were
 6 aware of."
 7 Is that all correct?
 8 A. Yes.
 9 Q. Moving down, you go on to say at the next paragraph,
 10 paragraph 4.24, towards the end of the first line:
 11 "I did not know what specific risks were involved
 12 with using combustible materials on buildings with
 13 a floor over 18m. However I was aware that there was
 14 clear guidance in Approved Document B that additional
 15 requirements needed to be met in order to use
 16 combustible materials on buildings with a floor over 18m
 17 and assumed that these additional requirements were
 18 there because there was some risk involved. Approved
 19 did not set out what the risks were."
 20 Do you mean there that you didn't know what the
 21 risks were because those risks were not set out in ADB?
 22 A. I believe that Approved Document B didn't actually state
 23 what the risks are. Approved Document B told you the
 24 route to compliance.
 25 Q. Yes, and other than from Approved Document B, is it your

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1 evidence that you didn't learn or understand what the
2 risks were from any other source?
3 A. I mean, if we go back to the question you asked a moment
4 ago about what formal training or what training we had:
5 as far as my training was concerned, it was mainly
6 involved with, at the time, understanding the document
7 itself, Approved Document B. It was a guidance
8 document. At the time there was no — as far as I'm
9 aware, there was no formal training courses in the UK
10 that you could go to to learn about Approved Document B,
11 so therefore it was left to individuals to understand
12 Approved Document B, and then you would refer to the
13 local authority building control in the region that had
14 the project.

15 So a typical example would be if we took Hereford,
16 where Kingspan is based, they would have had
17 a local authority building control, and then the idea
18 was that, as an individual, we would consult Approved
19 Document B, and then we would then refer that particular
20 customer to that local authority to get further advice.

21 So as far as the risks are concerned, we understood
22 that if you had a building over 18 metres, there was
23 an appropriate section. We went to that section and we
24 looked at what the guidance was and we followed that
25 guidance. For further advice on that guidance, you had

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1 these local authority building controls set up
2 throughout the UK that would give further support.
3 Q. Yes. What about within Kingspan? Did you ever learn
4 from within Kingspan what the risks were associated with
5 the use of combustible insulation?
6 A. Which dates are we talking now, 2001 to 2010 or —
7 Q. Yes, the entire period, 2001 to 2010.
8 A. Okay. So I would say in 2001 we were still a fairly
9 small department. We were setting up a technical
10 projects team. Up until that point, as far as I can
11 recall, there wasn't that many enquiries for buildings
12 above 18 metres. The majority of enquiries we used to
13 receive were below 18 metres.

14 I would say that between 2000 and 2010, once the
15 technical projects team had been set up, the technical
16 projects team then started doing internal training
17 sessions for people. This is where, for example, you
18 may have read in my witness statement that we had team
19 leaders. These team leaders were put in place to look
20 after a team of technical advisers, and those technical
21 advisers, along with their team leader, would sit down
22 with the technical projects team to understand more
23 about Approved Document B.

24 The reason we did that was because I believe the
25 enquiries coming in to the technical department were

14

1 starting to show more enquiries above 18 metres, so
2 therefore they obviously needed to have more
3 understanding of what was required.

4 Q. Yes.

5 A. Myself at the time, I didn't attend those technical
6 meetings. K15 was to me a small product within a bigger
7 basket of products, and my time was dealt with dealing
8 with other products, dealing with a team of around —
9 I think at the time I was managing 14 people. So my
10 involvement with K15 at the time was very small. But
11 I did put in place, along with the technical manager at
12 the time, a training programme whereby the technical
13 advisers at the time could, through their team leaders,
14 sit down with the technical projects team that
15 specialised in this subject.

16 Q. All right, thank you, that is all very helpful.

17 We are going to take this quite slowly and in
18 stages. Winding back to basics, really, during the
19 entire period from 2001 to 2010, did you at any time
20 read the guidance which is set out in ADB on
21 fire safety?

22 A. Yes, I did.

23 Q. Did that include B4, the section relating to external
24 fire spread?

25 A. I'm not familiar with B4. I do recall, though,

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1 a section to do with buildings above 18 metres.

2 Q. All right.

3 Do you think that in your role as technical services
4 manager, apart from having an awareness of the content
5 of ADB, you ought to have had some awareness of what the
6 risks were, the risks associated with the use of
7 combustible insulation over 18 metres?

8 A. In terms of my role as technical services manager, the
9 department was broken down into various different
10 sectors. My sector was obviously managing a team of
11 14 people. It dealt with a number of different
12 products, a number of different applications every day.

13 Q. Yes.

14 A. As far as Approved Document B and what I foresaw as
15 being the specific risks involved, my understanding is
16 that, as far as combustible materials are concerned,
17 they must pass a fire test in accordance with Approved
18 Document B. So I was aware of the risk of the fact that
19 you had to follow the guidance within Approved
20 Document B.

21 Q. Can we go now briefly to {KIN00005410}, please. You can
22 see at the top these are the minutes, in fact, of
23 a sales meeting held at Pembrige on 6 October 2009. Do
24 you see that?

25 A. Yes, I do, yes.

16

1 Q. Looking at that list, that appears to be a meeting that
 2 you attended. Do you see your name?
 3 A. Yes, I do.
 4 Q. And also Tony Millichap was present.
 5 If we can scroll down to page 2 {KIN00005410/2}, to
 6 the top of page 2, please, under the heading "K15". I'm
 7 just going to read this section to you:
 8 "Andy Pack talked briefly about K15 and how it is
 9 fixed.
 10 "There are 3 main documents for this product,
 11 standard literature, BBA certificate & LCA
 12 Building Control certificate for England & Wales only
 13 not Scotland.
 14 "K15 product (staying with structural team).
 15 "Action ASM's to discuss K15 with envelope
 16 contractors."
 17 Then at the next paragraph:
 18 "Question to ask when discussing K15
 19 "1. Is the building less than 18 metres in height?
 20 (Over 18metres becomes an issue as the height of
 21 fireman's ladder is 18metres)
 22 "2. What is the construction of the building?
 23 "Action — Mark Swift to issue K15 information pack
 24 (LABC documents etc)."
 25 Just looking at that section that I've read to you,

17

1 can you remember what it was that you explained at that
 2 meeting about how K15 was fixed?
 3 A. Looking at the document — and I have obviously seen
 4 this email or, I should say, agenda item before — the
 5 reason I used to get called into meetings such as this
 6 was to talk more about the site work application of the
 7 product.
 8 So at the time we had a business development
 9 manager, which as you can clearly see was Mark Swift.
 10 He was obviously dealing with this product at the time.
 11 The reason I came in as a technical representative was
 12 to discuss about the site work application of the
 13 product. That would have involved how to install the
 14 boards, in terms of laying the material, fixing the
 15 material, use of mechanical fixings, the use of tapes.
 16 So it was more of a case of talking about the
 17 application of the product in terms of site work.
 18 Q. Yes. Was it part of your role at the time to explain to
 19 the sales team what literature was available to support
 20 the use of K15?
 21 A. It wouldn't have been my remit to do that. Whether
 22 I said that at the meeting, I cannot remember. But it
 23 was definitely not my remit to advise the sales team as
 24 to what we have available.
 25 Q. All right, but on this occasion that's what the minutes

18

1 appear to record; yes?
 2 A. I believe there's a number of items here listed under
 3 K15 —
 4 Q. Yes.
 5 A. — referring to fixing, referring to the main documents.
 6 But from my recollection of this meeting, the only
 7 reason I was present was to talk about the installation
 8 of the product.
 9 Q. I see.
 10 Can you help us with this: the three main documents
 11 for the product that are referred to in the second line,
 12 there's the standard literature; is that a reference to
 13 the product literature for K15, the marketing
 14 literature?
 15 A. I would take that as yes, I believe so.
 16 Q. Then the BBA certificate, and then in the third line
 17 "LCA Building Control certificate". Is that an error
 18 there? Should that be the LABC certificate, the one
 19 that was issued in May 2009?
 20 A. I cannot comment. It looks — there is a possibility it
 21 is referring to that document. I didn't write these
 22 minutes, so unfortunately I can't —
 23 Q. Is there anything else you can think that would be
 24 a reference to?
 25 A. I mean, it looks to be a spelling mistake.

19

1 Q. Yes.
 2 A. Because when it says at the end "not Scotland", that
 3 does make me think that could reference back to the LABC
 4 document, and not something to do with LCA and the
 5 environmental side of things, because we also have LCA
 6 certificates.
 7 Q. All right.
 8 Just looking at the heading in bold, "Question to
 9 ask when discussing K15" — and I appreciate I think
 10 what you're saying is that this section of the minutes
 11 may not be a reference to you speaking, but you can tell
 12 me — it appears that it was common knowledge that over
 13 18 metres becomes an issue in relation to the use of
 14 K15; do you agree?
 15 A. Yes.
 16 Q. This comment about the height of a fireman's ladder, do
 17 you think you made that comment? Did you give that
 18 explanation as to the reason for 18 metres — I'm so
 19 sorry, I think I spoke over you. Did you say no?
 20 A. No.
 21 Q. All right. Do you remember that, because you were
 22 obviously present at the meeting?
 23 A. No, I don't remember.
 24 Q. Were you aware at any time that the figure of 18 metres
 25 was something to do with the height of a fireman's

20

1 ladder?
 2 A. I do recall occasionally in the office people mentioning
 3 from the projects team reference to a fireman's ladder,
 4 but there was never anything ever documented or
 5 referenced in any document.
 6 Q. I want to ask you now about the particular phrase
 7 "limited combustibility", and your understanding of that
 8 phrase.
 9 You were asked about this by the Inquiry. If we can
 10 go back to your witness statement, which is
 11 {KIN00008702/18}, the Inquiry question is above
 12 paragraph 5.10:
 13 "What was your own understanding of the meaning of
 14 the phrase 'limited combustibility'?"
 15 Your answer — I'll read it — was this:
 16 "All I knew was that at the back of Approved
 17 Document B there was a table which listed all of the
 18 definitions and included what 'limited combustibility'
 19 was. I cannot remember specifically where this was, but
 20 if anyone wanted to know the definition, they could go
 21 to the back of Approved Document B which would list
 22 tests for and materials which are deemed to be of
 23 'limited combustibility'. I relied on Approved
 24 Document B and other key guidance documents for
 25 information that I did not know off the top of my head.

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1 I did not know the definition of 'limited
 2 combustibility' off the top of my head because I knew
 3 that Kingspan's products were not of limited
 4 combustibility and so it was not a term I had to refer
 5 to often."
 6 Is that right?
 7 A. Correct. Yes.
 8 Q. Did you actually look at that table that you're
 9 referring to in the back of ADB?
 10 A. Yes.
 11 Q. Are you able to say how frequently you would have done
 12 that? And we're talking again, just to put it into
 13 context, about the period between 2001 and 2010.
 14 A. A handful of times. Very rarely.
 15 Q. If we can go now to page 17 of your witness statement
 16 {KIN00008702/17}, and to paragraph 5.5, you have
 17 referred to this already in one of your earlier answers,
 18 but here you set out your understanding of the BS 8414
 19 test series. Again, I'll read that. You say this:
 20 "My understanding is that you would have to test to
 21 either BS 8414 Part 1 or Part 2 depending on whether the
 22 system was to be built on a concrete or metal frame.
 23 Once you have done a BS 8414 test, you would then need
 24 to make sure that it met the criteria within BR 135 to
 25 allow you to use your system tested on a building with

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1 a floor above 18m."
 2 Yes?
 3 A. Yes.
 4 Q. So can I take it, looking really at the end of that
 5 paragraph that I've just read to you, that you
 6 understood that meeting the criteria in BR 135 by
 7 testing one system to BS 8414 allowed you to use that
 8 system, the same system you had tested, on a building
 9 over 18 metres —
 10 A. Yes.
 11 Q. — and not any other untested system?
 12 A. Yes.
 13 Q. Where did that understanding come from?
 14 A. To my recollection, that would have been fed to us by
 15 the technical projects team that we set up. I believe
 16 we ... I think it was around 2004/2005, from memory, we
 17 started to obviously receive a few enquiries above
 18 18 metres. It was around that time that the technical
 19 projects team was set up. They would have been the
 20 people involved with doing BS 8414. Their remit was to
 21 understand the testing and the requirements to be able
 22 to use our product above 18 metres following this
 23 criteria of making sure it met with BR 135.
 24 So that information would have been fed to us by the
 25 technical projects team at the time.

23

1 Q. Yes. Is it right for me to say that the technical
 2 projects team was led by Ivor Meredith?
 3 A. Yes.
 4 Q. Throughout that period, all the way up to 2010?
 5 A. Yes.
 6 Q. Just moving down from the paragraph we've just looked
 7 at, if you look now, please, at paragraph 5.6, you say
 8 in the first line there:
 9 "I do not know the BR 135 criteria and cannot
 10 comment on the appropriateness."
 11 A. Yes, correct.
 12 Q. I just want to be clear about the time period you're
 13 talking about. Did you know at any stage between 2001
 14 and 2010 what the criteria in BR 135 were?
 15 A. No.
 16 Q. I think this links back to your last answer. You say in
 17 the second half of that paragraph, 5.6, starting at the
 18 end of the first line:
 19 "As I say above, the Technical Projects Team dealt
 20 with queries relating to the use of K15 ... over 18m."
 21 Then you say at the end, essentially — I'm
 22 paraphrasing it — it was that team that dealt with
 23 compliance to BR 135; yes?
 24 A. Yes, that is correct, yes.
 25 Q. Is it right for me to say that that team, which you have

24

1 confirmed was led by Ivor Meredith, also report to
 2 Philip Heath?
 3 A. Yes, they would have reported to Ivor Meredith and
 4 Ivor Meredith would have reported to Philip Heath.
 5 Q. Thank you.
 6 Going on from there, I'm going to move on to some
 7 questions now about large-scale fire testing to BS 8414
 8 on K15. We need to go to page 7 of your witness
 9 statement {KIN00008702/7}, to paragraph 3.6.
 10 I think you have been asked above about large-scale
 11 fire testing, and you say in the first line:
 12 "I cannot remember the date but I know that at some
 13 stage large-scale fire tests were undertaken with K15."
 14 Then looking at the last line of that paragraph,
 15 starting halfway through:
 16 "I think it was somewhere in the mid-2000s that
 17 a large-scale fire test was undertaken by the Technical
 18 Projects Team, but I was not directly involved in that."
 19 Is that correct?
 20 A. Yes, that's correct.
 21 Q. Just for clarity, you say there that you were not
 22 directly involved; did you have any involvement in that
 23 large-scale fire test at all?
 24 A. No.
 25 Q. Then moving down now to page 21 of your statement

25

1 {KIN00008702/21}, if you can look at the very bottom of
 2 the page, at Inquiry question 27, you were asked the
 3 following question:
 4 "Were you aware that between 2005 and 2014, no
 5 BR 135 Classification Report existed for a system
 6 incorporating K15? If so, what significance, if any,
 7 did you attach to this?"
 8 If we go on to the next page {KIN00008702/22},
 9 please, to your answer, you say at 6.14:
 10 "If this is the case, I was not aware."
 11 Then obviously you didn't attach any significance to
 12 it because you weren't aware of it.
 13 I think you have confirmed this, but you did
 14 understand in the mid-2000s that, following a test to
 15 BS 8414, the results of that test or the test data would
 16 have to be assessed against the criteria in BR 135,
 17 didn't you?
 18 A. That's correct, yes.
 19 Q. Can we go now to an email, please, at {KIN00005166}.
 20 This is an email, you can see at the top, from
 21 Ivor Meredith to you, with Gareth Mills copied in, and
 22 it was sent on 7 April 2006.
 23 Looking at the first line, Mr Meredith says:
 24 "Andy
 25 "Please find enclosed the BS 8414 report."

26

1 Do you see that, in that email, Mr Meredith is
 2 actually sending to you a copy of the BS 8414 test
 3 report?
 4 A. Yes, it does say that.
 5 Q. Ivor Meredith writes there, and this is halfway through
 6 the first line, I'm going to read it with you:
 7 "Unfortunately the lady that is assessing this at
 8 the BRE is unwell at the moment and not expected back to
 9 work until later this month.
 10 "I suggest at the moment we keep this report under
 11 wraps like our itchy friends do with their acoustic
 12 report as the pictures within it are not very good. The
 13 assessment letter will contain a picture of the facade
 14 with the crib burning and a statement which confirms its
 15 ability to be used above 18m ... It is this assessment
 16 that will be freely available to be sent out to our
 17 customers."
 18 Do you agree that what Mr Meredith is explaining to
 19 you in that email is that it is the assessment that will
 20 be sent out to customers, not the BS 8414 test report
 21 itself?
 22 A. I've read this email, it was forwarded to me during
 23 the Inquiry. I have no recollection of this email.
 24 I do not understand what it means and I do not know why
 25 Ivor Meredith sent it to me.

27

1 Q. What part of it do you not understand?
 2 Can we look at the second paragraph -- sorry to
 3 interrupt -- that I've just read to you, starting,
 4 "I suggest at the moment we keep this report under
 5 wraps". I accept you have no recollection of it, it was
 6 in 2006, but looking at that paragraph now, what part of
 7 that paragraph do you not understand?
 8 A. The report. I don't know which report he's referring
 9 to.
 10 Q. He would be referring to the report that he has attached
 11 to the email, would he not?
 12 A. Yes, correct. I do not recall the report or the reason
 13 why he sent it to me.
 14 Q. All right.
 15 A. I mean, looking at the first line, it suggests that he's
 16 sent me an 8414 report.
 17 Q. Yes.
 18 A. Why he is sending me an email listing this information,
 19 I have no recollection at the time as to why he would do
 20 this. I've tried to recall during the process as to why
 21 he'd be sending me an assessment and then discussing
 22 pictures of the burning crib and so forth, but in answer
 23 to your question, I cannot recall what this was in
 24 relation to.
 25 Q. All right.

28

1 If you didn't understand it at the time, and you may
 2 not remember, did you ask Mr Meredith why he had sent
 3 you this email and what it meant?
 4 A. I cannot recall.
 5 Q. All right. So can I take it from what you have just
 6 told us that — well, no, you must answer: did you read
 7 that test report when it was sent to you?
 8 A. No.
 9 Q. Did you look at the pictures within it that he refers to
 10 in his email?
 11 A. I cannot recall if I read — if I saw the pictures.
 12 I guess what's going through my mind is that sometimes
 13 these reports would come through in other emails, so
 14 I guess what you've got to remember is that this was
 15 dated in 2006.
 16 Q. Yes.
 17 A. Did I see something in another email that makes me now
 18 think that I saw some information in the 8414? But
 19 I can't recall back to this particular email, reading
 20 the report, seeing the pictures, so I don't know why
 21 Ivor sent me that document. There's no — I mean,
 22 looking at the email, there's no ... no trail to the
 23 email, so why did he send me that report?
 24 Q. No.
 25 A. That's what I can't ... I mean, you have taken

29

1 a snapshot in time there of a document, but why was
 2 I sent that? Why was he even mentioning this to me?
 3 That I cannot recall, I am afraid.
 4 Q. You say, do you, that the 8414 test report was nothing
 5 to do with you?
 6 A. Correct.
 7 Q. Looking at the —
 8 A. I mean, I guess as far as the 8414 side of things is
 9 concerned, for whatever reason Ivor sent me this email,
 10 I cannot recall.
 11 Q. Yes.
 12 A. But as a technical services manager, I did not get
 13 involved in the understanding of 8414, in terms of the
 14 content of the report, the pictures in the report, then
 15 having to do a BR 135 classification.
 16 Q. Yes.
 17 A. All basically that would happen is Kingspan would
 18 undertake such a test. If it passed an 8414 test and it
 19 met the classification of BR 135, then, as a team, we
 20 would be told of that success. But up until that point,
 21 as a technical services frontline team, we had no
 22 involvement with 8414, understanding the reports,
 23 understanding BR 135 classification.
 24 Q. I see. All right. Well, I'm going to come on to some
 25 further questions about the way in which you learnt

30

1 about tests which had been carried out.
 2 I just want to ask you: at the fourth paragraph of
 3 this email, the one that begins, "I'm working on the
 4 possibility " — do you see that?
 5 A. Yes, I do.
 6 Q. He says:
 7 "I'm working on the possibility of some more testing
 8 which will cover the use of K15 with:— steel frame,
 9 ventilated cavities above or below 40mm and alternative
 10 cladding types."
 11 Now, I appreciate that you say you don't recollect
 12 receiving this, but I want to ask this: other than this
 13 test report, which I can tell you is a report of a test
 14 from May 2005 to BS 8414—1, do you know anything about
 15 any further testing to BS 8414 on systems incorporating
 16 K15 after this date, after April 2006?
 17 A. No.
 18 Q. Do you know anything about any tests on systems
 19 incorporating K15 to BS 8414—2 after this date?
 20 A. No.
 21 Q. Can I take it, then, that you have no awareness of four
 22 tests carried out on systems incorporating K15 to
 23 BS 8414—2 in December 2007, April 2008, and June 2008?
 24 A. No.
 25 Q. We're going to look at another email. This one is from

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1 a little later, and it's at {KIN00009262}.
 2 If we can go, please, to page 2 {KIN00009262/2},
 3 just to set it in context, about halfway down page 2 we
 4 can see an email from Rachel Banham, dated
 5 9 September 2011, sent to Joel Clarke. We don't need to
 6 go through it all, but she is asking some questions
 7 there about K15 and surface spread of flame
 8 requirements. That's in the subject title of the email,
 9 in fact. Do you see that?
 10 A. Yes, I do.
 11 Q. At the second paragraph, just above the drawing there,
 12 she says this:
 13 "The location of the insulation is within
 14 a rainscreen cavity (see detail below). The project is
 15 in Doha is [sic] primarily residential development with
 16 some areas of retail and hotel. As far as I am aware we
 17 are to comply with the British requirements as outlined
 18 previously."
 19 Keeping that in mind, if we go up, please, to page 1
 20 {KIN00009262/1}, we can see at the second email from the
 21 top that it's you that responds, and that's on
 22 16 September 2011 at 11.13; yes?
 23 A. Yes, correct.
 24 Q. It's quite a long email. I want to ask you, in fact,
 25 about the third paragraph down, beginning "Kooltherm K15

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1 Rainscreen Board", do you have it?

2 A. Yes.

3 Q. I'm going to read that. You say there:

4 "Kooltherm K15 Rainscreen Board carries third party

5 British Board of Agreement ... Approval Certificate No.

6 reads 08/4582, for use as an external thermal insulation

7 on new and existing masonry or steel frame walls used in

8 domestic and non-domestic buildings in conjunction with

9 masonry or weathertight ventilated cladding systems."

10 Then going down to the fourth paragraph, starting,

11 "Alongside the BBA Approval", just looking at that, you

12 say:

13 "Alongside the BBA Approval the Kooltherm K15

14 Rainscreen Boards were the first insulation boards to

15 achieve Local Authority Building Control (LABC) System

16 Approval as a thermal insulation layer in rainscreen

17 cladding systems. An LABC System Approval can

18 significantly reduce the time and costs associated with

19 a construction project. As part of this Approval

20 Kingspan Insulation Limited undertook large scale fire

21 tests meeting the performance criteria given in BRE

22 [135] ... for cladding systems using full scale test

23 data from BS 8414-1 ... and BS 8414-2 ..."

24 So, in fact, focusing on that paragraph that I've

25 just read to you, can you explain how the

33

1 BBA certificate that you're referring to showed that K15

2 can be used or could be used on steel-framed structures?

3 A. Okay. So our understanding was that, following the

4 success of the, I believe it was, 2005 test --

5 Q. Yes.

6 A. -- we took that test and we approached the LABC. At the

7 time, we'd only done a test on a masonry background.

8 Q. Yes.

9 A. Through the advice of the technical projects team and

10 the LABC, there was this consensus that if you had

11 a non-combustible background, for example masonry,

12 blockwork or a steel frame that was lined with

13 a non-combustible substrate --

14 Q. Yes.

15 A. -- that would be deemed as a route to market.

16 So the technical projects team, and obviously that

17 was also picked up through the LABC at the time, the

18 consensus we had within the industry was that if your

19 substrate was non-combustible and the steel frame with

20 the lining on the outside could be deemed as

21 non-combustible, that was your route to market to then

22 put the insulation on the outside to then be used with

23 a cladding that was of limited combustibility.

24 So what I was trying to sort of say in this email is

25 that through the K15 LABC approval and the fact that the

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1 BBA were also, I believe, looking at this similar

2 approach and the approach that the technical projects

3 team at Kingspan were looking at, it was seen as a route

4 to market without having to do a test on an 8414-2 if

5 you could claim that your substrate was built to be

6 non-combustible, with a non-combustible lining over

7 the steel frame. That was how it was being portrayed to

8 us as frontline advisers in the industry.

9 Q. Yes, it's that last part of your answer that I want to

10 focus on, please, just to ensure that I'm completely

11 clear.

12 I think what you said is that that was the consensus

13 through industry, and that it came to you from the

14 technical projects team and through the advice of the

15 LABC that, instead of testing to part 2, you could use

16 a non-combustible liner; is that your evidence?

17 A. Yes. And then I further sort of support that with:

18 obviously the technical projects team, they would have

19 been getting that information from somebody too. So

20 that makes me think that, you know, that is how the

21 industry were looking at it at the time.

22 Q. Yes. Well, hang on, just breaking that down. I'll come

23 back to the technical projects team.

24 You said LABC advice somehow contributed to that

25 consensus, that there was this sort of way round testing

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1 to 8414-2. Who at the LABC gave that advice, as far as

2 you're aware?

3 A. I do not recall.

4 Q. Was it given to you?

5 A. I believe within the LABC document that LABC published,

6 it referenced -- and if we can maybe bring that document

7 up, we can look at it in a bit more detail --

8 Q. We're going to go to that one in a lot of detail, but

9 just in more basic terms for now, aside from the terms

10 of that certificate, the 2009 LABC certificate, which we

11 will go through, thinking about this consensus you have

12 been talking about, I understand your evidence that that

13 information came to you from the technical projects

14 team, and I'll come to that, but in terms of actual

15 advice from the LABC that it was appropriate to get

16 around having no test evidence to 8414-2 by using some

17 sort of non-combustible liner, do you know when or to

18 whom that advice came to Kingspan from the LABC?

19 A. All I can recall is it's listed in the LABC document.

20 Q. Yes, all right.

21 In terms of what you were told or what was

22 communicated to you by the technical projects team, who

23 are you talking about in terms of individuals?

24 A. Over what time period now?

25 Q. I'm so sorry. So in relation to the information you

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1 picked up from the technical projects team that, instead
 2 of testing to 8414-2, you could use a non-combustible
 3 liner, who was it that told you that from the technical
 4 projects team?
 5 A. Very early on from when this first became a question,
 6 that would have been Ivor Meredith.
 7 Q. I see. Was that information also communicated to all of
 8 the frontline technical advisers?
 9 A. As far as I recall, yes.
 10 Q. By whom?
 11 A. That I cannot recall.
 12 Q. All right.
 13 As far as you are aware, Mr Pack, in 2011, which is
 14 the date of this email, what tests to BS 8414-2 had been
 15 conducted on any system incorporating K15?
 16 A. To my recollection, I would have, in 2011, only been
 17 aware of the one fire test that was undertaken to which
 18 this email would have been wrote, and that would have
 19 been referring back to 2005, I believe.
 20 Q. I see.
 21 The information you have just told us about that you
 22 and the frontline technical advisers were given, that
 23 there was some consensus that it was appropriate to use
 24 a non-combustible liner instead of testing to BS 8414-2,
 25 is that contained in an email anywhere? Do you think

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1 that was communicated to you and/or to the technical
 2 advisers in writing?
 3 A. I do not remember.
 4 Q. Because they're quite separate tests, aren't they?
 5 Part 1 is for masonry structures, and part 2 is for
 6 steel-framed structures. You were aware of the
 7 difference --
 8 A. That's correct, yes.
 9 Q. I'm so sorry, I spoke over you again.
 10 A. Yes, they are two different tests. And, as I recall,
 11 this was raised, and the consensus was that if your
 12 steel structure is lined with a non-combustible
 13 material --
 14 Q. Yes.
 15 A. -- then you could go forward with -- as a route to
 16 compliance, if that steel structure is protected by
 17 a non-combustible substrate, then you could rely upon
 18 the test data that you had for the part 1, because the
 19 only difference was the substrate behind.
 20 Q. Yes, just --
 21 A. I know, for example, the American fire test, they don't
 22 have two fire tests, they have one fire test,
 23 I understand.
 24 Q. Yes, but bearing in mind that this is England and
 25 Wales --

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1 A. Of course.
 2 Q. -- and that there are two tests, just thinking through
 3 what you've said, what would be the point in having
 4 a test to part 2, what would be the point in that test
 5 existing, if in fact all you needed to do was test to
 6 part 1 and put in a non-combustible liner?
 7 A. Well, that was the question that was being asked at the
 8 time --
 9 Q. By whom?
 10 A. -- these two tests. So obviously industry were aware of
 11 these two tests. Why was the test not being done on
 12 a part 2?
 13 Q. Can --
 14 A. The consensus was that because if you're lining it with
 15 a non-combustible backing board ...
 16 Q. Yes, I understand your evidence is about this consensus.
 17 You are talking, I think I'm right, about consensus
 18 within Kingspan, are you not?
 19 A. No. As I say, the LABC also recognised this, and also
 20 how did the technical projects team? They obviously
 21 dealt with external bodies on this, so --
 22 Q. Yes. But in terms of --
 23 A. My thought --
 24 Q. Go ahead.
 25 A. My thought would be that, you know, the technical

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1 projects team would be taking advice from external
 2 bodies, so what was the -- what was ever coming back to
 3 the technical projects team ...
 4 Q. All right. You say that the consensus was not within
 5 Kingspan. The technical projects team, just so that
 6 we're completely clear, is a team within Kingspan or was
 7 a team within Kingspan; yes?
 8 A. Yes.
 9 Q. Just in terms of what you can actually say about how
 10 that consensus was reached, I think what you're saying
 11 is that you were not party to any -- let's put aside the
 12 LABC certificate for 2009, because we're going to come
 13 back to that in some detail. So aside from that, as far
 14 as I can tell, what you're saying is that you yourself
 15 were not party to any of those discussions with outside
 16 bodies that you assume took place to allow the technical
 17 projects team to say, in your understanding, that there
 18 was this consensus that you didn't need to test to
 19 part 2 and you could just use a non-combustible liner;
 20 yes?
 21 A. Yes.
 22 Q. Going back to the email that we were looking at
 23 {KIN00009262}, and thinking about the paragraph that
 24 I read to you, the fourth paragraph, which starts,
 25 "Alongside the BBA approval" -- do you still have it up?

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1 A. Yes.
 2 Q. Would you agree, looking at it in general terms, that
 3 K15 is being portrayed in this email by you to be
 4 suitable for use over 18 metres in general on both
 5 masonry and steel-frame buildings?
 6 A. Correct, provided it met the criteria of BR 135.
 7 Q. Yes. All right.
 8 Going back just for a moment to the advice that we
 9 were talking about in terms of this consensus, so that
 10 I'm —
 11 SIR MARTIN MOORE-BICK: Sorry, Ms Troup, before we leave
 12 that document, I wonder if Mr Pack could help me with
 13 one question that's been troubling me.
 14 Mr Pack, if you look at that paragraph that counsel
 15 has just been referring you to, you say in the last
 16 sentence:
 17 "As part of this Approval Kingspan ... undertook
 18 large scale fire tests ..."
 19 In the plural, do you see that?
 20 A. Yes.
 21 SIR MARTIN MOORE-BICK: "... meeting the performance
 22 criteria given in BRE [135] ... for cladding systems
 23 using full scale test data from BS 8414-1 ... and
 24 BS 8414-2 ..."
 25 Now, that certainly could give the impression,

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1 couldn't it, that you tested to both 8414-1 and 8414-2?
 2 Is that a fair reading?
 3 A. That's correct.
 4 SIR MARTIN MOORE-BICK: Can you explain why you said that,
 5 if there had only been one test of which you were aware?
 6 A. I cannot recall.
 7 SIR MARTIN MOORE-BICK: All right.
 8 MS TROUP: Mr Pack, following on from that, that really is
 9 my question: you have described in a lot of detail the
 10 recollections you have about the consensus that you say
 11 was reached and the advice you understood the technical
 12 projects team to have taken from outside bodies; why,
 13 then, if you are clear about that, as you seem to be,
 14 does this email that we happen to have picked to
 15 Rachel Banham not explain that? Why does it not say,
 16 "A consensus has been reached, and you can check that
 17 with some of the outside bodies that the technical
 18 projects team have been discussing it with"? It doesn't
 19 say anything of the kind, does it?
 20 A. Correct. I do not remember.
 21 Q. I see.
 22 Instead, as has been pointed out, you refer to tests
 23 in the plural to BS 8414, and you specifically refer to
 24 tests carried out to BS 8414-2. There is nothing there
 25 about an alternative method of somehow passing part 2 by

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1 testing to part 1 and putting in a non-combustible
 2 liner, is there?
 3 A. Not in this email. Obviously, again, this is a snapshot
 4 of some text. What we don't know behind this is what
 5 the construction is.
 6 Q. No, sure, and we could spend a long time talking about
 7 that, but in plain and simple terms, what you have
 8 written here, that tests in the plural have been carried
 9 out and that those include tests to BS 8414-2, is not
 10 true, is it? It's not accurate?
 11 A. Correct.
 12 Q. I'm going to move on to some questions now — I was
 13 looking at the time — a little bit more about your
 14 understanding of the properties of K15 as a product and
 15 also the processes within Kingspan for handling
 16 technical queries about it. All right?
 17 A. Okay.
 18 Q. We're going to go back to your witness statement, which
 19 is {KIN00008702/9}, please. If we look at
 20 paragraph 4.3, in the second line — well, let's read
 21 from the start of it. You say there:
 22 "I was not involved in the marketing & promotion and
 23 testing of K15. As I say at paragraph 2.8 above,
 24 I generally only got involved in providing technical
 25 advice to customers in response to queries relating to

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1 K15 in very limited circumstances."
 2 Is that right?
 3 A. Yes, correct.
 4 Q. In terms of what those limited circumstances were, if we
 5 look in fact at paragraph 2.8 of your witness statement
 6 on page 4 {KIN00008702/4}, please, towards the end of
 7 the fifth line down, you give an example of
 8 circumstances in which you would get involved in
 9 technical advice, and you say there, this is at the
 10 sixth line:
 11 "... I would get involved would be when there was
 12 not enough capacity at Technical Advisor level (and
 13 later also at Technical Team Leader level) to respond to
 14 customer enquiries and so I would be required to get
 15 involved as additional resource."
 16 Do you see that?
 17 A. Yes, I do.
 18 Q. How often would you say that that occurred, that you
 19 were required to become involved as additional resource?
 20 A. I do not remember the actual amount of times.
 21 Q. No, fine. Just in general terms, was that something
 22 that happened frequently, would you say?
 23 A. I think generally only when people — due to a shortage
 24 of staff, I may get rolled in to help out, but it was on
 25 very rare occasions. I mean, we had the team set up in

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1 a way that we had a team dealing with this side of the
 2 business, so ... you know, it was very limited. It was
 3 only when there was, as I say, a shortness in staff or
 4 for whatever reason that I would get pulled in. But
 5 generally because of ... yeah, generally down to —
 6 Q. Right.
 7 Did that happen throughout the period from 2001 to
 8 2010?
 9 A. I would say yes, I was occasionally pulled in, as I say,
 10 to help when, for example, there was a short staff and
 11 I was pulled in to assist. But it was on very rare
 12 occasions. We had a large team that generally dealt
 13 with it, so ...
 14 Q. Fine.
 15 Were there any other circumstances, apart from where
 16 there was some sort of staff shortage, where you gave
 17 technical advice in relation to K15 and its use?
 18 A. I would say that between 2001 and 2010, the only time
 19 that I was pulled in to deal with enquiries was if there
 20 was — because of a shortage of staff or somebody wasn't
 21 available to deal with the enquiry. But that was on
 22 very rare occasions.
 23 Q. If we can go to page 8 of your witness statement
 24 {KIN00008702/8}, please, at paragraph 3.7, I think
 25 you're addressing there the development of the product

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1 K15, and you say in that paragraph:
 2 "As far as I am aware, I was never involved in any
 3 discussions regarding the development of the product.
 4 I just knew the outline facts set out above: that it was
 5 a Class 0 product, phenolic, et cetera."
 6 Could you tell us, first, when was it that you
 7 learnt of those outline facts you give about K15 as
 8 a product?
 9 A. That would have been when we bought the rights to the
 10 phenolic insulation material.
 11 Q. When was that?
 12 A. That would have been mid to late 1990s.
 13 Q. Where would you have learnt that from, can you remember?
 14 A. Yes, that would have been in the product literature that
 15 would have been within the actual information when we
 16 bought the company or bought the rights to the phenolic
 17 insulation.
 18 Q. You have said as your outline facts that it was
 19 a class 0 product and that it was a phenolic foam.
 20 Other than those two things, were there any other
 21 outline facts or properties which were specifically
 22 communicated to you about K15?
 23 A. Which year now, sorry?
 24 Q. At any time.
 25 A. So I think this section here is in relation to class 0,

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1 so this would have been, as I say, when we took over the
 2 rights to sell the phenolic insulation in the mid to
 3 late 1990s, and then I believe we would have carried
 4 that class 0 all the way until we did our very first
 5 large-scale fire test, and I guess that's then when the
 6 additional fire information would start to come into the
 7 product literature.
 8 Q. Yes, all right.
 9 As a new product, when K15 was a new product on
 10 which your technical advisers or the technical advisers
 11 you supervised would be taking calls, answering email
 12 queries, how was K15 described to you? How was it
 13 presented to you?
 14 A. So it was never really more than maybe a couple of
 15 things. The first thing was obviously the thermal
 16 performance of the product. Thermal conductivity was
 17 the main driver for the material. And then alongside
 18 that we had the fire classification of class 0.
 19 Q. Yes.
 20 A. Obviously, as a product, K15 was a very small product in
 21 the basket of materials that I dealt with, but the two
 22 characteristics I recall from the K15 was the low
 23 thermal conductivity and the fact that it was class 0.
 24 And then it wasn't until, as I say, getting on to the
 25 mid to late 2000s that they did a fire test and that

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1 then enabled the use of this product above 18 metres
 2 when it was a specific construction to be used.
 3 Q. Yes.
 4 A. But up until then it was mainly the thermal conductivity
 5 and the class 0 were the two key points.
 6 Q. You also understood though, and I think you have
 7 confirmed this, that it was a combustible material?
 8 A. It was a combustible material, yes.
 9 Q. Let's move on to talk a little about the way in which
 10 you and the technical advisers you supervised became
 11 aware of fire tests which had been carried out on K15.
 12 You referred to this a little earlier in one of your
 13 previous answers, but I want to take you through it now.
 14 If we can look, please, at page 22 of your witness
 15 statement {KIN00008702/22} and at paragraph 6.17. You
 16 have been asked there in particular — well, the
 17 question you have been asked, it's Inquiry question 29,
 18 is:
 19 "During the period 2005 — 28 September 2015, on what
 20 basis did Kingspan take the position that K15 had been
 21 'tested successfully' to BS 8414—1 ...?"
 22 Your answer is as follows:
 23 "The Technical Services Team took this position
 24 based on what it had been told by the Technical Projects
 25 Team: we were told that a large scale fire test had been

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1 carried out using K15 on a particular construction and
 2 that construction had been tested successfully to
 3 BS 8414 as it had met the criteria of BR 135, in
 4 accordance with Approved Document B.”
 5 Then going on, this is more general:
 6 “The Technical Projects Team would regularly feed
 7 down information to the Technical Services Team about
 8 successful product tests so that we could take these
 9 successful tests into account when we were answering
 10 customers’ enquiries. We would not necessarily be told
 11 the date on which the successful tests had been carried
 12 out and the detail of the tests. We would just be told
 13 which test(s) we could say that a product had ‘passed’.”
 14 Yes?
 15 A. Yes, correct.
 16 Q. Now, you have explained to us that you were certainly
 17 aware that BS 8414 was a system test, not a product
 18 test; yes?
 19 A. Yes, correct.
 20 Q. When the technical advisers you supervised were given
 21 information about that large—scale fire test to
 22 BS 8414—1, the test we have been discussing that was
 23 carried out in May 2005, was it communicated to them
 24 that 8414 is not a test which a product can pass, it is
 25 a test which only a whole system can pass?

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1 A. I can only comment on what I was told. I mean, I guess
 2 whatever was told to the rest of the team would have
 3 been similar to myself. But my understanding was that
 4 we did a fire test to BS 8414, and from that particular
 5 test, it was fed down to myself, and I’m assuming the
 6 same would be for the rest of the team, that provided
 7 the substrate was of limited to non—combustible, and the
 8 cladding was of limited/non—combustible, then the
 9 product could be used within that build—up.
 10 Q. Yes, we will come back to that. I just want to pick up
 11 on something you said just now in your answer.
 12 You said that you assumed that the understanding of
 13 your technical advisers, the technical advisers you
 14 supervised, would have been similar to your own in
 15 understanding that BS 8414 was a system test.
 16 A. Yes.
 17 Q. Putting it plainly, the frontline technical advisers
 18 would need to understand that, would they not, that it
 19 wasn’t a product test, it was a system test?
 20 A. They would have known that it was a system test, yes.
 21 Q. I see.
 22 A. I mean —
 23 Q. How do you know that they knew that? What I’m asking,
 24 Mr Pack, is this: was it part of your role to ensure
 25 that they had, the technical advisers, that basic

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1 understanding about 8414 as a system test?
 2 A. No, it wasn’t my role. It was the technical leader at
 3 the time.
 4 Q. Who was?
 5 A. So the team was split up into teams. So if you look at
 6 it as a group, there was the technical manager, which
 7 then split down into the technical projects team, the
 8 technical services team, and then we had another team.
 9 I was obviously in charge of the technical services
 10 team, but underneath me we had two technical project
 11 leaders. Their job was to make sure that the advice
 12 given out by the technical advisers was correct. So
 13 that’s where the training came in. Those technical
 14 leaders would sit down with their team and the technical
 15 projects and discuss all about the requirements of K15
 16 and how to bring it to market in terms of the technical
 17 support.
 18 Q. All right. Just before we pause, who were those
 19 technical leaders that you’re talking about, what were
 20 their names?
 21 A. So they would have changed names over a period of time,
 22 because you’re looking at a period of time now, I’m
 23 guessing, again between 2001 and 2015, is it?
 24 Q. Yes.
 25 A. Yeah, so I mean over that course of 10 to 12 years,

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1 those project leaders changed. So when we first put the
 2 technical project leaders in charge, they had like four
 3 or five advisers underneath of them.
 4 Q. Yes.
 5 A. But those technical services — sorry, those technical
 6 project leaders, they would change because they would
 7 leave the company or move to a different role, so you
 8 would have had many different names, so ...
 9 Q. All right.
 10 In any event, it’s your evidence that it wasn’t part
 11 of your role to ensure that the frontline advisers knew
 12 that 8414 was a system test, but you’re nonetheless able
 13 to say that they would have known that; yes?
 14 A. Yes.
 15 MS TROUP: All right.
 16 Mr Pack, if you wait there for a moment. I’m just
 17 looking at the time. I’m going to ask the Chairman
 18 whether in fact this might be a good time for us to take
 19 a short break.
 20 SIR MARTIN MOORE—BICK: Yes, Ms Troup, is that convenient to
 21 you?
 22 MS TROUP: Yes, it is.
 23 SIR MARTIN MOORE—BICK: Right. Well, Mr Pack, I think it’s
 24 a good idea that we have a short break now.
 25 I must remind you, please, not to talk to anyone

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1 about your evidence while we are out of the hearing
 2 room. We will come back at 11.35 our time. I can't
 3 remember what it is your time.
 4 THE WITNESS: Four hours ahead here in Dubai, yes.
 5 SIR MARTIN MOORE—BICK: It will be 11.35 our time, 15.35
 6 your time.
 7 THE WITNESS: Correct. Yes.
 8 SIR MARTIN MOORE—BICK: We will look forward to seeing you
 9 again then to continue. All right?
 10 THE WITNESS: Thank you.
 11 SIR MARTIN MOORE—BICK: Thank you very much.
 12 THE WITNESS: Thank you.
 13 (11.20 am)
 14 (A short break)
 15 (11.35 am)
 16 SIR MARTIN MOORE—BICK: Hello, Mr Pack. We should be back
 17 with you. Can you see me and can you hear me?
 18 THE WITNESS: Yes, I can, thank you.
 19 SIR MARTIN MOORE—BICK: Thank you very much. Are you ready
 20 to carry on?
 21 THE WITNESS: Yes, I am.
 22 SIR MARTIN MOORE—BICK: Thank you very much. I'm going to
 23 invite Ms Troup to put some more questions to you.
 24 Yes, Ms Troup.
 25 MS TROUP: Thank you.

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1 Mr Pack, we're going to move on to some questions
 2 around Kingspan's policy as to the use of K15. So if we
 3 can go back, first, to your witness statement, please,
 4 at {KIN00008702/12}. If we look at the middle of the
 5 page at Inquiry question 12, you're asked there the
 6 following question:
 7 "Please describe in detail how Kingspan formed
 8 policy as to technical advice to be given to customers
 9 making enquiries as to the use of K15 on buildings with
 10 a floor over 18m, at any stage in which you were
 11 involved in any aspect of the product."
 12 Your answer is below it at 4.16, where you say:
 13 "I was not involved in forming the policy ..."
 14 I'm not going to read the rest of it.
 15 If we can go over now, please, to page 13 of your
 16 witness statement {KIN00008702/13}, and to
 17 paragraph 4.18, there you say this:
 18 "Other than overseeing a team dealing with these
 19 policies and being generally aware of the policy with
 20 regard to enquiries over 18m, I had no other role in
 21 directing any strategy on dealing with these sorts of
 22 enquiries."
 23 Is that right?
 24 A. That is correct, yes.
 25 Q. So can you tell us this: what was Kingspan's policy with

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1 regard to enquiries over 18 metres, the policy of which
 2 you say you were generally aware? What was it?
 3 A. In terms of handling the enquiry?
 4 Q. Yes.
 5 A. The technical enquiry?
 6 Q. Yes.
 7 A. So the policy was that when we received an enquiry, this
 8 would obviously come through the technical adviser. The
 9 technical adviser then would deal with that enquiry. If
 10 that enquiry was of a nature that that technical adviser
 11 couldn't deal with, then the technical team leader would
 12 be involved. The technical team leader then would
 13 support that technical adviser, and if the technical
 14 team leader couldn't help the technical adviser, it
 15 would then get forwarded up the chain to the technical
 16 projects team, and the technical projects team would
 17 then deal with the enquiry with the technical team
 18 leader and the technical adviser.
 19 Q. Yes. I think what you have very helpfully described
 20 there is the process by which those enquiries were
 21 handled rather than the policy itself.
 22 Let me put it in a different way: if a customer were
 23 to get in contact with a technical adviser on the front
 24 line at Kingspan and say, "Hello, can K15 be used on
 25 buildings over 18 metres?", as far as you are aware,

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1 what would Kingspan's answer to that be? What was
 2 Kingspan's policy on the use of the product over
 3 18 metres?
 4 A. So they would generally, I would say, take down the
 5 details of the enquiry —
 6 Q. Yes.
 7 A. — and they would discuss it with their team leader, and
 8 then, as I say, if for example that team leader couldn't
 9 help them, it would go back to the technical projects
 10 team.
 11 Q. Yes, I'm sorry, again I'll put it differently: if you
 12 had been asked at some stage during the period that you
 13 were technical services manager the question, "Is K15
 14 a product which can be used over 18 metres?", what do
 15 you think your answer would have been?
 16 A. So first of all we would have taken down the details of
 17 the construction —
 18 Q. Yes.
 19 A. — details of the project, the height of the building,
 20 we would have taken down all of the relevant
 21 information —
 22 Q. Yes.
 23 A. — and then we would have referred that then to the
 24 technical projects team.
 25 Q. I see.

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1 Do you have any idea in what situations, so with
 2 what build—ups, K15 could be suitable for use over
 3 18 metres, during the period 2001 to 2010?
 4 A. So the understanding was that if the cladding was of
 5 limited combustibility or non—combustibility, and
 6 likewise the inner substrate was limited
 7 combustibility/non—combustibility, then the
 8 consideration of the Kooltherm K15 could be put forward.
 9 Q. Where did that understanding on your part come from,
 10 that the outer cladding, I think you're saying, simply
 11 had to be of limited combustibility or non—combustible?
 12 How did you come to learn that?
 13 A. So that came down from the technical projects team.
 14 Q. Yes, who in particular?
 15 A. That would have come from Ivor Meredith.
 16 Q. To you directly?
 17 A. To the department.
 18 Q. In writing or verbally?
 19 A. That I cannot remember.
 20 Q. I see.
 21 We're going to go back to your witness statement
 22 now, to page 51 {KIN00008702/51}. If we look, please,
 23 at paragraph 10.36, you say in the first line this:
 24 "As far as I am aware, I was not appraised of the
 25 specific details of this test at the relevant time ..."

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1 In fact, I should have made clear, you are being
 2 asked there about the BS 8414—1 test we have been
 3 discussing, which took place in May 2005. All right?
 4 A. Okay.
 5 Q. What you say is that you were not appraised of the
 6 specific details of that test.
 7 Can you help me with this: what were you told, if
 8 anything, about the system build—up in relation to that
 9 test? What did you understand were the materials that
 10 had been tested?
 11 A. I understood that the substrate to which the insulation
 12 was fixed was limited combustibility or
 13 non—combustibility, and then the cladding on the outside
 14 also had to be of limited
 15 combustibility/non—combustibility.
 16 Q. Yes, I understand that you were given to understand that
 17 the cladding on the outside had to be of limited
 18 combustibility or non—combustible. What I'm asking now
 19 instead really is: do you know what the outer cladding
 20 material used in that test, in May 2005, actually was?
 21 Or did you know at the relevant time?
 22 A. I cannot remember.
 23 Q. Do you know now?
 24 A. No.
 25 Q. Right.

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1 If we could look at the paragraph below, which is
 2 10.37, I want to ask you about the test report for that
 3 8414—1 test. You say there:
 4 "As far as I can remember, I did not really have
 5 visibility of test reports ..."
 6 Then you go on to say:
 7 "I may have seen a report or two in the early days,
 8 when Kingspan carried out its first large—scale tests,
 9 but this would have purely just been for my information.
 10 To the best of my knowledge, I would not have seen any
 11 in late 2005 onwards. I was never expected to
 12 understand the content of or to comment upon test
 13 reports. Test reports were generally kept within the
 14 Technical Projects Team."
 15 I think my question is this: when you say, "I did
 16 not really have visibility of test reports", did you
 17 ever, during the period from 2001 to 2010, actually read
 18 any BS 8414 test report for a system incorporating K15?
 19 A. No.
 20 Q. So we saw earlier today that one was sent to you but you
 21 said that you couldn't recollect that and you didn't
 22 read it; yes?
 23 A. That's correct.
 24 Q. All right.
 25 I want to ask you now — if we can go, please, to

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1 page 22 of your witness statement {KIN00008702/22}, and
 2 to paragraph 6.17. This is about the same fire test,
 3 and you say here:
 4 "The Technical Services Team took this position
 5 [that is, relating to the question above, the position
 6 that that test had been successful] based on what it had
 7 been told by the Technical Projects Team: we were told
 8 that a large scale fire test had been carried out using
 9 K15 on a particular construction and that construction
 10 had been tested successfully to BS 8414 as it had met
 11 the criteria of BR 135, in accordance with Approved
 12 Document B."
 13 I think we might have been to that already,
 14 actually.
 15 So what I want to try to find out from you is this:
 16 were you told at the time — when you are talking here
 17 about, "We were told that a fire test had been carried
 18 out and that it had been successful because it had met
 19 the criteria", you use the words there "on a particular
 20 construction". That's in line 3 of that paragraph.
 21 Were you in fact told what the particular construction
 22 was?
 23 A. This is what I cannot recall. My understanding was they
 24 did a particular construction but I cannot recall what
 25 that construction was. I still cannot recall what that

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1 construction was. All I know was the materials they
 2 used would allow the use of a cladding that was classed
 3 as limited to non-combustibility. But as to actually
 4 what that material type is, I cannot remember and
 5 I cannot recall now.
 6 Q. Fine.
 7 A. In terms of the test reports, what I was trying to say
 8 here is that you have a team that do fire testing, and
 9 those fire tests were very much kept within that small
 10 team. They were not something that were released out on
 11 a daily basis. So when you showed me that email earlier
 12 where Ivor Meredith sent me that report, to me that was
 13 very strange, because we very rarely got the reports
 14 sent to us. We didn't know when we'd failed, we didn't
 15 know when we passed, until it was disclosed to us. So
 16 it was very rare to see a test report. Sometimes you
 17 might see a test report on a desk, and sometimes if
 18 I was in Ivor's office or one of my other colleagues'
 19 office, I would see a test report.
 20 So the visibility of these test reports was very,
 21 very small. It was kept within a small team.
 22 Q. Yes, I understand.
 23 The impression you seem to be giving, and you must
 24 correct me if I'm wrong about this, is the test reports
 25 were almost kept secret to within the technical projects

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1 team; is that fair?
 2 A. Yes, correct.
 3 Q. Why? Why was that?
 4 A. I believe that culture is still today, within many
 5 businesses. I mean, you'll have to ask the question of
 6 the people who do these tests: why are the tests kept
 7 where they are? Throughout my career at Kingspan, when
 8 people do fire testing, it has been the case that those
 9 test reports have been kept within the people that do
 10 that testing. You'd have to ask the people that do that
 11 testing why that is. I don't know.
 12 Q. Well, have you ever asked that question?
 13 A. I have asked the question in the past.
 14 Q. And what was the answer?
 15 A. I cannot recall the answer from that time.
 16 Q. Do you know who you asked?
 17 A. I cannot recall.
 18 Q. All right.
 19 Going back to what we looked at and your description
 20 of being told that a particular construction had passed
 21 to 8414, I appreciate that you're saying that you can't
 22 recall what it was, but just to be clear, you're not
 23 saying, are you, in terms of this secrecy, that your
 24 teams were simply told a particular construction has
 25 been tested to 8414 and has passed, without being told

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1 what the construction was? Or are you saying that?
 2 A. No, what I'm saying is they did a fire test --
 3 Q. Yes.
 4 A. -- obviously on whatever construction was built, but the
 5 information that was fed to us was that the cladding
 6 that was used in that fire test was of a material that
 7 allowed our material to be used behind a material of
 8 limited combustibility or non-combustibility. What
 9 I cannot recall is what that material was.
 10 Q. Fine. So you were told immediately on learning of the
 11 successful fire test in May 2005 that, whatever the
 12 outer cladding material was and whatever the inner
 13 structure was, that successful test meant that K15 could
 14 be used with any cladding material which was
 15 non-combustible or of limited combustibility?
 16 A. Correct, yes.
 17 Q. Mr --
 18 A. That was our understanding.
 19 Q. That was your understanding. Did you ever question
 20 that?
 21 A. I guess we looked to this technical projects team as
 22 they were the people that we looked up to. They had the
 23 knowledge, the expertise. They had a -- I wouldn't say
 24 an aura about them within the business, but they were
 25 certainly put into that position for their credibility,

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1 for their technical knowledge. So we as a frontline
 2 team would have looked to those, or that team, I should
 3 say, to be providing us with the accurate information
 4 and tools to be able to go out into the market. That
 5 was the reason for setting up that team in the first
 6 place.
 7 Q. Yes, I understand. Essentially what you're saying is
 8 that you and your team placed reliance on what you were
 9 told by the technical projects team, isn't it?
 10 A. Absolutely, yes.
 11 Q. Mr Pack, you understood what a BS 8414 test was and that
 12 it was a system test; yes?
 13 A. Yes, correct.
 14 Q. You therefore understood that if you wanted to use
 15 a combustible insulation material such as K15 on
 16 a building over 18 metres, you would need to replicate
 17 exactly the system which had been tested to 8414 and had
 18 met the criteria in 135, surely?
 19 A. Correct. And, as I say, the information that was fed to
 20 us was that provided the material was of limited
 21 combustibility or non-combustibility, regardless of
 22 whether it was terracotta, stone, concrete, provided
 23 that material was classed as limited
 24 combustibility/non-combustibility then it could be used
 25 behind that cladding.

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1 Q. Mr Pack, I need to push you on this. We've looked at
 2 some sections of your witness statement in which you
 3 have explained your understanding of 8414, and that
 4 meeting the criteria in BR 135 allows you to use your
 5 system tested on a building over 18 metres. How, in
 6 your mind, does one successful test to 8414—1 translate
 7 and extend into being able to use all manner of
 8 materials as the outer cladding when those did not form
 9 part of the tested system?

10 A. Those manner of materials you refer to, if they were
 11 classed as combustible, then no, you wouldn't be able to
 12 use it. What I'm saying is if the cladding on the
 13 outside was classed as limited combustibility or
 14 non-combustibility, and represented that classification
 15 of limited combustibility/non-combustibility, then it
 16 could be used. I'm not saying it can be used behind all
 17 types of cladding that are not in that classification,
 18 for example many of these aluminium cladding panels.

19 Q. Yes. All right.

20 Is that the basis on which your frontline technical
 21 advisers were told to advise customers, that any
 22 non-combustible or limited combustibility outer cladding
 23 could be used with K15 over 18 metres?

24 A. I cannot comment on my team, but as far as I'm
 25 concerned, that was my understanding.

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1 Q. Did you not supervise those technical advisers?

2 A. As I mentioned earlier, when it came to K15, we had
 3 a procedure in place where the enquiry came in to the
 4 technical adviser, that then went to the technical team
 5 leader, and the technical team leader to the technical
 6 projects manager. So you can see from my point of view,
 7 the loop where I came in was actually outside of what
 8 I was dealing with.

9 Q. Did you at any time receive information from the
 10 technical projects team to the effect that the test data
 11 from the May 2005 test to 8414—1 was applicable only to
 12 the specific configuration tested and to no other?

13 A. Sorry, can you repeat that again, please.

14 Q. Of course.

15 Did you at any time receive from the technical
 16 projects team any information to the effect that the
 17 test data from the 8414—1 test in May 2005 could only
 18 relate to the specific system tested and not to any
 19 other?

20 A. No.

21 Q. The test we have been discussing just now, the BS 8414—1
 22 test in May 2005, was in fact the only successful test
 23 to 8414 carried out on any system incorporating K15
 24 during the entire period from 2001 to 2010, wasn't it?

25 A. Until you just told me that now, I did not know that.

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1 Q. I see. You thought there were others?

2 A. I assumed there would be other fire tests, yes. But if
 3 that's what you're saying, then ...

4 Q. Well, I am. Just trying to be clear on that, during the
 5 time that you were technical services manager, is it
 6 your evidence that you thought throughout that there may
 7 have been other successful 8414 tests which you simply
 8 were never told about?

9 A. Sorry, which timeline is this now, until 2010?

10 Q. 2001 to 2010.

11 A. Okay, sorry. I was thinking you were asking questions
 12 now to present day.

13 Q. No.

14 A. Okay, so up to 2010, yes, that was the only fire test
 15 that I was aware of.

16 Q. Yes, that had been successful?

17 A. The only fire test — correct, yes.

18 Q. Yes, all right.

19 A. I guess there's been fire — sorry, I'm getting confused
 20 with the dates again.

21 Q. All right.

22 A. So 2010, just to reconfirm, that was the only test that
 23 I was aware of that we'd done and passed, correct, yes.

24 Q. Yes.

25 All right, we're going to go back to your witness

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1 statement, please, {KIN00008702/23}. If we can look at
 2 paragraph 6.18 at the top, you say this:

3 "As far as I am aware, in the normal course of
 4 things, I was not told about tests that were not
 5 successful. There may have been occasions on which,
 6 through casual conversation with other Kingspan
 7 personnel, an unsuccessful test might have been
 8 mentioned to me but, normally, I would not expect to be
 9 made aware of these tests."

10 Is that right?

11 A. Yes, correct.

12 Q. Can you explain why you would not normally have expected
 13 to be made aware of tests which Kingspan considered to
 14 have been unsuccessful?

15 A. I do not know why. The testing was dealt with, as
 16 I mentioned, within a small team. It was something that
 17 obviously they formed policy on. It was very much
 18 a team that was set up to deal with this. But as to why
 19 we were not told, you'd have to speak to the technical
 20 projects team on that.

21 Q. Yes, all right.

22 In your mind, why would it be that only the test
 23 information which could support the use of K15, so
 24 successful test information, would be shared?

25 A. I guess to allow us to utilise our product on projects.

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1 Q. Yes. Did you ever question that? Did you ever think:
2 actually we ought to hear about unsuccessful testing as
3 well?
4 A. I guess because my remit at Kingspan in terms of K15 was
5 a very small percentage of what I did on a daily
6 basis — I mean, I could go for months without being
7 involved with K15, so it was never a big part of my
8 daily working routine. So my involvement with K15 as
9 a product, testing, certification, was very small. So
10 in the basket of products I dealt with, I never thought
11 to question it because K15 was not my product on a daily
12 basis that I dealt with.
13 Q. Even so, did you not ever think that it might be
14 important for the frontline technical advisers at least
15 to have some awareness of situations in which the use of
16 K15 could not be supported or where the use of that
17 product had been shown to be dangerous? Did that occur
18 to you?
19 A. I guess what went through my mind was when the enquiry
20 came through to the technical adviser and then they
21 flagged it up to their team leader and then that team
22 leader flagged it up to the technical projects manager
23 or team, they would have sat down within that group, as
24 I saw on many occasions they would sit in one end of the
25 office discussing the project. So I would have thought,

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1 if anything, that would have come up during the
2 discussion for the enquiry that they were dealing with.
3 Q. I see.
4 Let's move on now to your role in terms of
5 Kingspan's marketing material and product literature,
6 again, I'm afraid, concentrating on K15.
7 If we can go back to your witness statement again,
8 {KIN00008702/8}, please. At paragraph 3.9, you were
9 asked about marketing there, and you say:
10 "I was not involved in the decision to first market
11 K15 for use in external cladding systems on buildings
12 with a floor over 18m in England and Wales. I have seen
13 the relevant product literature and understand this was
14 in around 2007."
15 Yes?
16 A. Yes, correct.
17 Q. Can you help us as to who would have made the decision
18 to market K15 as suitable for use over 18 metres?
19 A. I do not know.
20 Q. Right.
21 Are you able to say from your own knowledge of the
22 operation of the relevant teams at the time who it might
23 have been that made that decision?
24 A. I would have thought it would have been a joint decision
25 between a number of different departments. I think —

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1 well, I can only surmise here, but I would have thought
2 it would have been a joint decision between technical,
3 marketing and business development. Those would be the
4 three departments that would have, if anything —
5 Q. Yes.
6 A. — been involved, yeah.
7 Q. All right.
8 Going now, please, back to your witness statement,
9 {KIN00008702/10}, if we look at paragraph 4.6, this
10 again is in relation to marketing material, product
11 literature and the like. You say there at the top:
12 "I used to have a good eye for any discrepancy in
13 figures (for example, thermal values, LAMBDA values),
14 physical properties, section drawings and typographical
15 errors, so I did have some involvement in checking
16 marketing literature."
17 What time period are you referring to there? Do you
18 mean this was throughout your time as technical services
19 manager?
20 A. Yes, it would have been very much in the early times of
21 Kingspan, and then I would say that as we got into the
22 2000s we used to have a — like a group team. So,
23 for example, I would say prior to 2001 it would have
24 been myself and maybe two colleagues. We had a smaller
25 team then. As the team grew and went past 2001, we

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1 would have had a team of maybe six/seven people checking
2 this literature where it used to go through each
3 individual to be checked.
4 Q. I see. Can you remember which pieces of marketing
5 literature you checked?
6 A. I was mostly involved with a lot of the roofing
7 literature, because that was quite technical, mainly to
8 do with more — I would say more technical applications
9 rather than probably the K15. So there was a lot of
10 other product literature that we used to have to deal
11 with.
12 As far as the K15, I do remember looking at items
13 such as thermal conductivity, checking the density,
14 checking the water vapour resistance and things to do
15 with the more sort of general physical properties.
16 When it came to the fire side of things, not just on
17 the K15 but on all of the brochures, we used to tend to
18 leave that to our technical projects team because they
19 were — that was the reason they were set up, was to
20 duly get involved with the fire side of things. So they
21 would check the literature in terms of what we were
22 writing and referencing.
23 Q. All right.
24 Mr Heath, Philip Heath, in his witness statement —
25 I don't think we need to go to it, but for the

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1 transcript it's at {KIN00020709/20}, paragraph 4.4 —
 2 his evidence is that the main review of the technical
 3 content of marketing documents was carried out by you.
 4 Do you say that he is wrong about that?
 5 A. I would say that between — throughout the 1990s up to
 6 2000, yes, because there was only probably a small
 7 number of us in the department, I agree with that, but
 8 I do not agree with that going through the 2000s. We
 9 actually had five or six people reviewing literature at
 10 the time.
 11 Q. I see. I should correct myself; in fact he says you and
 12 Ivor Meredith, not just you.
 13 A. Okay.
 14 Q. But thank you.
 15 A. I would disagree with that.
 16 Q. You would, or you would disagree?
 17 A. I would disagree with that.
 18 Q. All right.
 19 Let's go back to your witness statement, please,
 20 {KIN00008702/10}, and it's 4.6 again. This is
 21 four lines up from the bottom of the paragraph starting,
 22 "My proof reading capacity", do you see it?
 23 A. Yes.
 24 Q. You say there:
 25 "My proof reading capacity did not extend to

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1 checking that tests that were listed had been successful
 2 and were accurately described. However, I did always
 3 flag that these sections of the literature needed to be
 4 checked by those who were directly involved in the
 5 testing of the products."
 6 Yes?
 7 A. Correct.
 8 Q. Who was it that you would flag that to?
 9 A. So as I mentioned a moment ago, that would have been the
 10 technical projects team.
 11 Q. I see.
 12 When you're describing that process, you use the
 13 word "always", "However, I did always flag". How often
 14 did you do that?
 15 A. So when a piece of literature came up for renewal and it
 16 went into the system, and then six or seven people were
 17 involved in checking the literature, once it came to me
 18 I would always put a note on there to check this section
 19 of the literature through the technical projects.
 20 Q. Thank you.
 21 Just thinking about some of the K15 product
 22 literature, of which there were several issues over the
 23 years, I want to ask you about the entire period — so,
 24 again, we're looking at 2001 to 2010 — before you moved
 25 to focus on different jurisdictions.

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1 Did you ever notice that none of the marketing
 2 material — in fact, again, I'm going to correct myself,
 3 I'm sorry. Thinking about the period from 2007 onwards,
 4 actually. So K15 product literature produced from 2007
 5 onwards. Did you ever notice that none of it explained
 6 that K15 had been tested to BS 8414—1 only, in one
 7 specific configuration only, and could therefore comply
 8 for use over 18 metres only in that specific
 9 configuration?
 10 A. Yeah, I do not recall what the marketing literature read
 11 then in 2007.
 12 Q. Right.
 13 A. Yeah.
 14 Q. Do you know anything about any changes to the K15
 15 product itself over the years?
 16 A. Apart from the thermal conductivity, no.
 17 Q. All right.
 18 Were you unaware that after the May 2005 test to
 19 8414—1 there had been quite a significant change to the
 20 phenolic foam itself?
 21 A. No, I didn't know that.
 22 Q. Were you also unaware that in around about
 23 September 2006 at the same time there had been a change
 24 to the foil facers of the product to introduce
 25 perforations to those facers?

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1 A. Yes, I heard that there was a change in the perforation,
 2 but not necessarily in the facing. As far as I can
 3 recall, there was a change in the thermal conductivity.
 4 Q. Yes.
 5 A. I understand the facing was perforated, but I didn't —
 6 did not know that the facings had been changed. I do
 7 recall there was something about a change in ... I'm
 8 trying to remember what it was to do with now. There
 9 were some working groups that were set up —
 10 Q. Yes.
 11 A. — and I remember being called to maybe one or two of
 12 them to talk about thermal conductivity and the effect
 13 it would have on the thickness. So I would say that
 14 there was obviously something at the time, because
 15 I remember going along to this particular meeting,
 16 because they asked me about what effect the changing
 17 lambda would have on thickness.
 18 Q. I see.
 19 A. But other than that, that was my only knowledge of
 20 anything.
 21 Q. All right. When was that, do you know?
 22 A. I'm thinking that was ... I do not remember. If I had
 23 to say, it was ... yeah, I cannot recall without
 24 referring back to — and I know that the Inquiry has
 25 shown me some meeting minutes, where I was on one of

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1 those meeting minutes. It's whatever date is on that
 2 meeting. Yeah.
 3 Q. All right.
 4 Thinking back again to the marketing material
 5 specifically for K15, did you ever notice that all of
 6 the K15 product literature or marketing literature which
 7 refers to use over 18 metres talks about K15 as
 8 a product which meets the criteria in BR 135, as though
 9 that is something that a product by itself can do?
 10 A. I cannot recall, I'm sorry.
 11 Q. No.
 12 A. I know that 2008 was when I started moving away from the
 13 UK. 2009, I was moving away from the UK to deal with
 14 other bits and projects around the world. So I cannot
 15 recall, I'm afraid.
 16 Q. No, fine. We're going to come on to it, but one of the
 17 pieces of the product literature, it's the eighth issue
 18 dated November 2008, is one which you gave to
 19 David Jones in preparation for the issue of the LABC
 20 certificate. Do you remember that?
 21 A. I cannot remember the date or the version —
 22 Q. No, fine.
 23 A. I remember presenting a piece of literature to that
 24 meeting, correct. As to what —
 25 Q. Before presenting it — I'm so sorry, go ahead.

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1 A. As to what date or issue, I cannot recall.
 2 Q. No, that's fine.
 3 Before presenting it to Mr Jones, did you read it?
 4 A. I would have no doubt — if it was a published piece of
 5 literature from Kingspan, I would no doubt have seen
 6 that literature and read through the literature.
 7 Q. You would have seen it.
 8 That piece of literature — as I said, we're going
 9 to come on to it — describes K15 as a product which
 10 meets the criteria in BR 135. Now, you know that 8414
 11 is a system test, and it's simply inaccurate to say that
 12 a product can meet the criteria in BR 135; is that fair?
 13 A. Based upon a system test, yes.
 14 Q. Yes.
 15 A. I guess that's a question you'd have to pose to the
 16 marketing department, who controlled this literature.
 17 Q. Yes, of course, but I'm at the moment asking you about
 18 your thoughts on it.
 19 Did you ever raise any concerns at any stage to
 20 anyone within Kingspan about the clarity, accuracy or
 21 adequacy of any of Kingspan's marketing material for
 22 K15?
 23 A. I would say that based on the time period and the fact
 24 that our marketing department and our technical projects
 25 department were producing this text and format for the

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1 literature, I would have assumed that what they were
 2 putting in there was technically correct.
 3 Q. Yes. So your answer is no, you never raised any
 4 concerns?
 5 A. No, I didn't, no.
 6 Q. Thank you.
 7 We're going to look now back at your witness
 8 statement, please, {KIN00008702/32}. If we can look at
 9 paragraph 7.44, it's at the top, you have been asked
 10 there about your own awareness of any concerns which
 11 might have been raised about the use of K15 on buildings
 12 over 18 metres; all right?
 13 A. Okay.
 14 Q. Your answer reads:
 15 "No I cannot really remember being aware of any
 16 concerns. I was often copied in to emails relating to
 17 matters in which I was not really involved, either just
 18 for my information or because people knew I was in
 19 a managerial position. If a query was outside of my
 20 remit, I would pass it on to the appropriate person
 21 within Kingspan to deal with it. I do not remember
 22 seeing emails about concerns around the use of K15 over
 23 18m but it is possible that I was copied in on emails
 24 relating to this which I did not read."
 25 Is that right?

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1 A. That's correct.
 2 Q. What do you mean by that? Why would you not have read
 3 those emails if you were copied in to them?
 4 A. I guess at the end of the day I cannot control who sends
 5 me an email. There was a culture at the time that
 6 emails seemed to be just sent to department heads, for
 7 whatever reason. But I looked through all of these
 8 emails and the majority of them I can't understand why
 9 I was sent these emails. I've tried to understand why
 10 was I sent the emails that — where I was copied on.
 11 I can only think at the time that I reported in to the
 12 same department head as the technical projects manager,
 13 and I sometimes think that I was copied on emails as
 14 a means to show visibility for that particular
 15 individual. And I felt that nine times out of ten the
 16 only reason I was being sent these emails was to show
 17 that this particular individual was doing their job.
 18 Q. I see.
 19 Would I be right, then, in thinking that you're not
 20 simply saying that you would not have read emails on
 21 this particular subject, K15 over 18 metres, there are
 22 other subjects —
 23 A. Yeah, other subjects too, yeah. I mean, there's — when
 24 I was in this particular position and I was obviously in
 25 charge of a team as we had, we didn't just have K15 as

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1 a product, there was a multitude of products in our
 2 basket. I used to receive emails on a daily basis which
 3 I could physically not read. A lot of those emails, as
 4 I say, were from a particular department head to justify
 5 his reason for working that day.
 6 Q. Who are you talking about there?
 7 A. That would be the technical projects manager at the
 8 time.
 9 Q. Mr Meredith?
 10 A. Yes.
 11 Q. Thank you.
 12 Just in terms of emails which may have related to
 13 concerns about the use of K15 over 18 metres,
 14 I appreciate that you have told us that you only gave
 15 technical advice about the use of K15 over 18 metres on
 16 rare occasions, but even so, wasn't it a risk not to
 17 read those emails, in that you might be unaware of
 18 something you needed to know in giving technical advice?
 19 A. So on the occasion where I did have an enquiry, when
 20 I was to deal with it, the first thing I would do is
 21 before I would send it out, because I didn't have the
 22 knowledge, I would then go to the technical projects
 23 manager and the technical manager at the time and show
 24 them what I'd drafted for them to check before it was
 25 sent. So I always had somebody checking the work before

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1 it went out.
 2 Q. You said there "on the occasion"; do you mean to suggest
 3 that there was only one occasion on which you answered
 4 a query? I just want to be clear.
 5 A. I cannot remember how many occasions but it was a very
 6 small number of occasions, as I mentioned earlier on in
 7 the Inquiry, where, for example, the team was short
 8 staffed, if I had to deal with the enquiry because there
 9 wasn't enough personnel. But it was on a very
 10 small scale over the course of the years that we had
 11 K15.
 12 Q. All right.
 13 Do you remember a period, perhaps in 2007 or 2008,
 14 during which concerns about the use of K15 over
 15 18 metres were being raised so frequently that Kingspan
 16 had started to send out letters of suitability on
 17 a project-by-project basis?
 18 A. No.
 19 Q. I see.
 20 Can we go, please, to {KIN00005308}. This is quite
 21 a long email chain between Alistair Lambie, you and
 22 Ivor Meredith, and it all arises from a query from
 23 a firm of architects as to the use of K15 in
 24 a ten-storey project, and it's in 2007, all right, for
 25 context.

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1 Just looking at this section, do you remember this
 2 at all? You may not and we're going to go over it, so
 3 don't worry.
 4 A. No, I do not recall.
 5 Q. All right.
 6 If we can go down, please, to page 4 of this chain
 7 {KIN00005308/4}, to the bottom of page 4. At the very
 8 bottom of page 4 we can see that there is an email from
 9 someone called Beatrice Bryant, that's the client, sent
 10 to Alistair Lambie on 27 July 2007. Do you see that?
 11 A. Yes.
 12 Q. If we go down to page 5 {KIN00005308/5}, she has said to
 13 Mr Lambie at the top of the page there:
 14 "We are considering specifying this for a 10 storey
 15 project (residential) and our fire consultant has asked
 16 me to ask you to send us a copy of the assessment that
 17 was carried out in accordance with BR 135."
 18 Do you see that?
 19 A. Yes.
 20 Q. If we go up the chain, please, to the next email timed
 21 at 08.23 on 8 August 2007 {KIN00005308/4}, Mr Lambie
 22 sends that email on to you and only to you. Do you see
 23 that?
 24 A. Yes.
 25 Q. He says there:

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1 "Andy,
 2 "The suitability of K15 in a ventilated cavity over
 3 18 metres is being questioned more and more in Scotland.
 4 Can you forward all the relevant fire
 5 assessments/certificates/documents to the architect
 6 below and to myself ..."
 7 Then he goes on to talk about making a K15 pack.
 8 Yes?
 9 A. Yes.
 10 Q. Can we go up again, then, please, to your response, so
 11 the next email up in the chain {KIN00005308/3}, which is
 12 timed at 16.51, and that's your response to
 13 Alistair Lambie. You have copied in Ivor Meredith and
 14 you say there that you're looking into it and you will
 15 come back to him; yes?
 16 A. "We are currently looking into this", yes.
 17 Q. Yes. Do you remember any of this now?
 18 A. No.
 19 Q. All right.
 20 Let's go up now, please, to page 2 {KIN00005308/2}
 21 and to Ivor Meredith's email at 17.51. There it is. If
 22 you look in the middle of the page, we can see that it's
 23 Ivor Meredith who responds on 14 August 2007 at 17.51
 24 and he copies you in — well, no, he sends it to you,
 25 with Mr Lambie. He says this in the first paragraph:

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1 "We are a little reluctant to go public with the
2 actual test information at the moment as this is only to
3 BS 8414—1 and I suspect this job would be a BS 8414—2
4 project. At the moment I'm doing vast amounts of work
5 to produce a very robust situation where Kooltherm K15
6 can be used on all substrates and with most generic
7 types of cladding."
8 And he goes on there.
9 Looking, please, at paragraph 2, he says this:
10 "Until that time we have the BS 8414 flyer, we will
11 write letters of suitability and for larger projects
12 I can come and do a specific K15 technical fire
13 presentation which details our compliance with BR 135."
14 Then he says:
15 "A common misconception is that the BRE have to
16 write an assessment to BR 135 when actually all you have
17 to do is pass the test and therefore you meet the
18 criteria ..."
19 Going on:
20 "Anyway I was hoping by this time I would have
21 something better on paper that we could address the
22 Scottish situation with however this is a little way
23 off. [Until] then most projects are dealt with on a job
24 for job basis as although K15 is suitable the
25 surrounding cladding may mean that you can't use K15 ...

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1 that's the last thing we want to tell our customers so
2 if you can get the following information I will write
3 a letter specifically for this job that hopefully
4 provides enough confidence in our product."
5 Just stopping there, do you remember reading this or
6 receiving it?
7 A. No, I don't.
8 Q. All right.
9 By 2007, you were aware, I think, that part 2 of
10 BS 8414 had been published?
11 A. Sorry, can you repeat that?
12 Q. Of course. I will put it differently.
13 Were you aware by 2007, which is the date of these
14 emails, that part 2 of BS 8414 had been published?
15 A. Hadn't been published?
16 Q. Had been published.
17 A. I just recall there being an Approved Document B that
18 stated in there part 1 and part 2.
19 Q. Yes. Sorry, I'm going to ask for that email —
20 A. I didn't quite understand the question, sorry.
21 Q. That's fine. All I'm asking is whether by 2007 you were
22 aware of the existence of BS 8414—2?
23 A. Yes.
24 Q. Yes.
25 A. Yes, yes.

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1 Q. I'm going to ask for that email to come back up, please,
2 it's {KIN00005308/2}. If we could leave it there for
3 a moment.
4 Do you see that in the first two lines Mr Meredith
5 makes clear that "we", he, is reluctant to go public
6 with the actual test information?
7 A. Yes, I can see that.
8 Q. And the reason for that is that the only test
9 information is to BS 8414 part 1, and this particular
10 job that is being dealt with in this email is probably
11 a part 2 job, so a steel-framed system rather than
12 masonry.
13 A. Yes, I can see that.
14 Q. Yes. He certainly doesn't say, "That's fine because we
15 can tell them that there is a consensus we can put in
16 a non-combustible liner", does he?
17 A. No.
18 Q. No. All right.
19 Do you think it is the case that if the test report
20 for the May 2005 test to 8414—1 had been actually sent
21 out to customers, it would have alerted them to the fact
22 that it only covered masonry structures, not
23 steel-framed structures, and only one specific
24 configuration?
25 A. I guess it depends how the 8414 report would list the

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1 construction. I'm not familiar with how it lists the
2 construction. But if it listed the construction and
3 said masonry in a skin, then yes, people would say:
4 where do I now sit with a steel frame?
5 Q. Yes, and if indeed the test report said that it related
6 only to the system tested, that would also raise
7 questions in customers' minds, wouldn't it?
8 A. Yes, if the — depending on how the test report was
9 listed in terms of the cladding as well, yes, that would
10 also give customers an idea then as to what was tested,
11 correct.
12 Q. Yes, all right. So instead, as Mr Meredith explains in
13 this email, Kingspan were writing what he calls letters
14 of suitability for each specific project; yes?
15 A. Sorry, say that again, sorry.
16 Q. Instead of sending out the test report, what Mr Meredith
17 explains in this email is that Kingspan were sending out
18 letters of suitability for each specific project; yes?
19 A. In the second paragraph, yes, correct, he does say that.
20 Q. Yes. Do you now remember anything at all about those
21 letters, having looked at this email?
22 A. No. Sorry.
23 Q. Mr Meredith was asked about this when he gave evidence
24 to the Inquiry before Christmas, and we don't need to go
25 to it, but for the transcript it's at {Day76/81:15–25}.

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1 Mr Meredith was specifically asked about the letters of
 2 suitability which were being written during this period,
 3 and, Mr Pack, it was his evidence that those letters
 4 were predominantly written by senior technical advisers,
 5 including you.
 6 Do you say that he is wrong about that?
 7 A. It depends as to what the letter of suitability is in
 8 regards to. If it's in regards to saying it's complying
 9 with BS 8414 —
 10 Q. Yes.
 11 A. — then I would need to see the evidence to suggest
 12 that. It depends how he means writing letters of
 13 suitability. I don't understand what the —
 14 Q. He was talking about letters of suitability, the exact
 15 type we're looking at in this email —
 16 A. Okay.
 17 Q. — where instead of sending out the test report,
 18 Kingspan were sending out letters essentially confirming
 19 to a client that the proposed build-up —
 20 A. Okay.
 21 Q. — was suitable and that K15 was suitable.
 22 A. Okay.
 23 Q. Does that make sense?
 24 A. Yes, it does. And if I did write a letter —
 25 Q. Yes?

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1 A. — then it would have been very much on the basis that
 2 the cladding being used was limited combustible or
 3 non-combustible and the inner skin was non-combustible.
 4 Q. All right.
 5 Let's have a look — actually, it's a letter written
 6 or signed by Philip Heath. It's at {KIN00003726},
 7 please.
 8 So the letter is dated 29 October 2008, and it's
 9 a letter to Simon Hepworth at Astec Projects about
 10 a residential development called Grosvenor Waterside.
 11 Do you see that?
 12 A. Yes.
 13 Q. Do you think you have seen this letter before? Take
 14 your time to look through it. Do you remember it at
 15 all?
 16 A. I do not remember it.
 17 Q. All right.
 18 It's a fairly dense letter, and we don't need to go
 19 through it line by line, although we can do if at any
 20 stage you need to. As an overview, Mr Heath does
 21 confirm in it — this is at the fourth paragraph on
 22 page 1, beginning "Section 12" — and I'm paraphrasing,
 23 that K15 is not a material of limited combustibility,
 24 and that in order to be used over 18 metres the designer
 25 can follow the BR 135 route to compliance.

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1 Then if we can look at his final paragraph on
 2 page 1, he says this:
 3 "As you will appreciate, it is not practically or
 4 financially feasible for a component manufacturer, such
 5 as Kingspan ... to test in accordance with BS8414 with
 6 every rainscreen cladding material and component
 7 currently available. However, tests undertaken by
 8 ourselves, with and without a generic cladding system,
 9 showed the requirements of BR135 via BS8414 test method
 10 were achieved."
 11 Then going over on to page 2 {KIN00003726/2},
 12 please:
 13 "Based on above route to compliance, together with
 14 [BBA] Approval 08/4582, Kingspan Insulation Limited can
 15 confirm the product is fit for the intended purpose and
 16 is suitable for your development."
 17 He then writes at the final paragraph, starting in
 18 the first line:
 19 "... in the event you should require further
 20 information, please [contact] either Andrew Pack —
 21 Technical Services Manager or myself."
 22 Do you see that?
 23 A. Yes, I do.
 24 Q. Why is it you that's named as the alternative contact
 25 for Philip Heath in this type of letter?

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1 A. I do not know why. I can only —
 2 Q. Were you unaware?
 3 A. I can only think because I was a close contact for
 4 Philip Heath he's put me in that letter, but I do not
 5 recall why he's put me in there.
 6 Q. I see.
 7 A. I can only think that because I was a unit head, he's
 8 put me in there in case somebody couldn't get hold of
 9 him by telephone call, to come through myself, because
 10 I used to obviously report straight in to Philip Heath.
 11 Q. Yes.
 12 A. He should have put Ivor Meredith in there.
 13 Q. Yes, because on your evidence, if this customer,
 14 Simon Hepworth, had contacted you, you wouldn't have
 15 been able to assist him, would you?
 16 A. Correct.
 17 Q. Were you aware that Philip Heath was naming you as the
 18 alternative contact in this way, in his letters of
 19 suitability?
 20 A. No.
 21 Q. Do you say that it's an error?
 22 A. I can't comment on why he put my name in there, other
 23 than the fact that I was always available in the office
 24 as — if somebody was to ring up, so maybe he thought
 25 that by putting my name in there, as a department head,

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1 but from the contents of the material within this
 2 letter, I was the wrong name.
 3 Q. I see, all right.
 4 Can we go now to {KIN00005365}, please. This is
 5 a series of emails also in fact dating from October 2008
 6 into which you're copied. Do you see that at the top?
 7 A. Yes, I do.
 8 Q. I don't intend to take you through all of these, but
 9 again for context — and we can go through them if you
 10 need to — these emails are between Wintech,
 11 Bowmer + Kirkland and Kingspan in relation to a project
 12 called City Park; does that ring any bell for you?
 13 A. No.
 14 Q. It's this project, I think, in fact, that you refer to
 15 in your witness statement. We're going to need to go to
 16 that, I'm afraid. So {KIN00008702}.
 17 A. Okay.
 18 Q. Just very briefly, and to page 32 of your witness
 19 statement {KIN00008702/32}, please. It's
 20 paragraph 7.44. We need to go to the seventh line down,
 21 which starts — the first part of it is "not read" and
 22 then it says, "I have been shown", do you see that?
 23 A. Yes.
 24 Q. You say:
 25 "I have been shown an email chain in which

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1 I prepared a response to a customer regarding the use of
 2 K15 above 18m. Whilst I do not specifically recall this
 3 email, it is likely that I was asked to draft a response
 4 to a customer as a one-off because other members of the
 5 team were indisposed and unable to respond quickly."
 6 Yes?
 7 A. Yes.
 8 Q. You go on to say, just as you have explained, that you
 9 ran it past Philip Heath and Ivor Meredith in draft
 10 before sending it out. Do you remember that?
 11 A. Yes, I recall at the time when I did my original draft
 12 statement I didn't recall it, then they showed me
 13 an email, I still didn't recall the email, but obviously
 14 it shows I have drafted some response which then I ran
 15 past Philip Heath and Ivor Meredith to check.
 16 Q. Yes.
 17 A. So I guess, to recap, I don't recall the email, then
 18 I was shown the email, I still didn't recall the email,
 19 but the proof is that I wrote the draft text, which was
 20 then passed through Philip Heath and Ivor Meredith to
 21 check.
 22 Q. Yes, I understand, all right.
 23 So if we can go back now, please, to the email we
 24 had up previously at {KIN00005365}, I want to go,
 25 please, to page 5 {KIN00005365/5}, and it's to an email

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1 you sent at 13.02, there it is, on 16 October 2008.
 2 I think that is the email that you have just been
 3 referring to, isn't it, the one-off that you drafted and
 4 ran past Philip Heath and Ivor Meredith?
 5 A. Okay.
 6 Q. Take your time to look at it. I think that's the —
 7 A. Sorry. Yes, I can see my name on the top now, yes. So
 8 that's the email then that's referring to my witness
 9 statement and the fact that I drafted an email.
 10 Q. Yes, all right.
 11 A. Okay.
 12 Q. You say, I think you just confirmed, that this would
 13 have been a one-off?
 14 A. Yes.
 15 Q. All right.
 16 Can we go up to page 1, please, of this chain
 17 {KIN00005365/1}. At the fourth email down — so it's
 18 a little bit dense, but can you see sort of two-thirds
 19 of the way down the page there is an email from
 20 Philip Heath to you and Gareth Mills and Ivor Meredith,
 21 and it's sent at 11.05. Do you see that one?
 22 A. Yes.
 23 Q. He says there:
 24 "In the event you [haven't] answered this AM email
 25 [Ivor], AP and I are currently preparing a detailed

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1 response, that we will then adopt as standard issue."
 2 Do you see that?
 3 A. Yes.
 4 Q. The AP there is you, isn't it?
 5 A. Yes.
 6 Q. Did you, with Philip Heath, prepare a detailed letter of
 7 response to these clients?
 8 A. I cannot remember.
 9 Q. All right.
 10 Could we just move up this page, please, to the top.
 11 You're still copied in there, along with Philip Heath,
 12 in Ivor Meredith's email where he says:
 13 "Before I go back up north today can we agree
 14 the strategy for rainscreens and Wintech. I think we
 15 should consider a slight amendment to the lit ..."
 16 That means literature, presumably, does it?
 17 A. Yes, I would read that as being literature.
 18 Q. "... to mention fire barriers. I'm available and in
 19 office between 10.30 and 1."
 20 Do you see that?
 21 A. Yes.
 22 Q. What can you remember, if anything, about the firm
 23 Wintech?
 24 A. Nothing, I'm afraid, sorry.
 25 Q. You don't remember that particular firm raising issues

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1 as to the suitability for use of K15 over 18 metres?
 2 A. My understanding of Wintech is they're a consultant or
 3 a third-party consultant that look at fire on buildings.
 4 Q. Yes.
 5 A. I've heard of the name. I've actually heard of the name
 6 probably more in my latter career over here in the
 7 Middle East than I did in the UK.
 8 Q. I see.
 9 A. I do know the name but I do not know as to what context
 10 this email is in relation to Wintech and the fact that
 11 this email that Philip Heath is referring to, yes, I --
 12 Q. Did you take any part in agreeing a strategy for
 13 rainscreens and Wintech as Mr Meredith mentions there in
 14 his first line?
 15 A. No.
 16 Q. I see.
 17 Is this, Mr Pack, another email which you were
 18 copied in to for no good reason at all?
 19 A. Absolutely.
 20 Q. I see.
 21 Forgive me, but did you ever think of saying to
 22 someone, "Stop copying me into these emails, I'm not
 23 reading them, they're nothing to do with me"?
 24 A. I guess at the time -- I mean, looking back in
 25 hindsight, yes, you do refer to people to say, "Please,

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1 you know, why do you keep copying me in on these
 2 emails?" I'm bound to have had conversations over the
 3 time. The culture very much was an email culture of
 4 cc'ing everybody and sending emails to everybody. I'm
 5 sure at some stage I would have said, "Please ..." But
 6 I cannot recall on what subjects and topics.
 7 Q. No, I understand. The reason I ask, the emails we've
 8 looked at are not copying in huge mailing lists or huge
 9 numbers of people; they're generally copying in you and
 10 Mr Meredith or you and Mr Heath. In relation to the
 11 letter that we looked at about Grosvenor Waterside, it's
 12 you alone that's named as the alternative contact for
 13 Mr Heath.
 14 So it's not really a situation of a culture of just
 15 copying in everyone, is it? It seems to be a sort of
 16 ongoing error as to what your role is and your remit.
 17 Is that fair?
 18 A. No, I would say that there is a culture. I mean,
 19 obviously you've picked on a couple of emails there.
 20 Q. Yes.
 21 A. I mean, every day I received probably in excess of 120
 22 to 150 emails a day coming into my inbox. I can't
 23 physically read every email that comes in. A lot of the
 24 time I was cc'd, whether it was just two people or ten
 25 people. Those emails would come in. The only reason

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1 I was on the majority of emails was because I was
 2 a department head, and at the time, why Ivor used to
 3 copy me in on emails and Phil used to copy me in on
 4 emails I can only think was because I was a department
 5 head at the time, and for whatever reason they had it in
 6 their mind to send it to me, I do not know.
 7 Q. All right.
 8 Can you think of any reason why, in the emails we
 9 just looked at about the project with Bowmer + Kirkland,
 10 Mr Heath would have told Ivor Meredith that you and he
 11 were preparing a detailed response which was to become
 12 standard? That's not an issue of you being
 13 inadvertently copied in, is it? It's him actually
 14 saying that you and he were doing that work together.
 15 A. It does, yes, and I don't recall doing that work or
 16 putting that in motion.
 17 Q. All right.
 18 We're going to move on now to look at the LABC
 19 system or type approval certificate which was obtained
 20 for K15 in May 2009. I want to talk to you first about
 21 your own role in that.
 22 Philip Heath was your line manager in 2009; yes?
 23 A. Yes.
 24 Q. Philip Heath has confirmed for us in his evidence to
 25 the Inquiry -- and again, there is no need to go to it,

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1 but for the transcript it's at {Day79/164:17-23} -- that
 2 the decision to approach the LABC to try to obtain
 3 a certificate for K15 was his decision. Do you agree
 4 with that?
 5 A. Sorry, repeat that last bit again, please.
 6 Q. Mr Heath told us that the decision to approach the LABC
 7 to obtain a certificate for K15 was his decision, and my
 8 question was whether you agree with that.
 9 A. Yes, I agree.
 10 Q. Right.
 11 He also told us in his witness statement -- and
 12 again, we don't need to go to it, but it's at
 13 {KIN00020709/21}, paragraph 4.9 -- that you were the
 14 person who managed the process of obtaining the LABC
 15 system approval certificate, and that while he had
 16 overall responsibility for it, you ran the project. Do
 17 you think that's right?
 18 A. Yes, I wouldn't say I managed it and ran the project;
 19 I think I was more of an admin role between Kingspan and
 20 the authorities that were doing the certification.
 21 Q. What do you mean by more of an admin role? What do you
 22 mean by that?
 23 A. So basically I'd never done a certification before in
 24 Kingspan. I'm not a project manager. The reason I call
 25 it an admin role is because that's how it felt when

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1 I did the — this course of work at the time.
 2 Q. I see.
 3 Can you tell us how you came to be involved in that
 4 role, whatever it was? Why was it you that came to be
 5 involved in it?
 6 A. That's a very good question. Somebody showed me
 7 an email recently where Philip Heath had actually sent
 8 the email to three people, and actually my name was on
 9 the list.
 10 Q. Yes.
 11 A. I can only think at the time, and I guess Philip Heath
 12 will be able to answer this question, but I wasn't
 13 a project manager, I was not part of the projects team,
 14 but it ended up on my plate. I don't know why that is.
 15 I can only think that the other two individuals were
 16 busy at the time.
 17 Q. Yes.
 18 A. That's all I can think of. But anyway, my name was
 19 given to LABC as the person that they should contact to
 20 take this on.
 21 Q. Yes, all right.
 22 We're going to come on to the email that you're
 23 talking about where Mr Heath asked three people,
 24 including you, about the LABC certification and whether
 25 one could be achieved for K15. I should say that is

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1 an email that has only been provided to this Inquiry
 2 very recently, on 22 January, I think, so we didn't have
 3 the opportunity to put it to Mr Heath, but we can
 4 nonetheless put it to you.
 5 All right, let's go to your witness statement,
 6 please, {KIN00008702/33}.
 7 Mr Pack, can you hear that?
 8 A. Yes, I can, yeah.
 9 Q. I'm sorry, I don't know what that is. It appears to
 10 have stopped for now.
 11 SIR MARTIN MOORE-BICK: Sorry, just to interrupt you.
 12 I suggest you carry on for the moment.
 13 MS TROUP: I will.
 14 SIR MARTIN MOORE-BICK: If it continues or occurs very
 15 often, then we may have to take other measures. But we
 16 will carry on for the time being.
 17 MS TROUP: All right. I will be brave and continue for now.
 18 It appears to have stopped.
 19 Right, sorry about that, Mr Pack.
 20 We're going to look at page 33 {KIN00008702/33},
 21 please, and paragraph 7.47. Towards the end of the
 22 second line there, do you see that you say:
 23 "I was involved in initial discussions with LABC."
 24 Do you see that?
 25 A. I'm just trying to —

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1 Q. I'm so sorry, so —
 2 A. Yes, 7.47, yes.
 3 Q. 7.47, the second line, towards the end:
 4 "I was involved in initial discussions with LABC."
 5 A. Right.
 6 Q. Just thinking now about initial discussions, so we're
 7 going to come on later — I know that there was
 8 a meeting. But in terms of initial discussions that you
 9 refer to there, can you remember when those began?
 10 A. November 2008.
 11 Q. Who were they with?
 12 A. So my name was obviously given by Philip Heath to
 13 LABC —
 14 Q. Yes.
 15 A. — and then I believe I then spoke to — or they either
 16 contacted me or I contacted them and spoke to LABC and
 17 said, "I believe that my line manager's been in
 18 conversation with you with regards to creating an LABC
 19 similar to what we did on a previous project", another
 20 product, and that was the initial discussions, and they
 21 said, "Yes, that's correct", and — how much do you want
 22 me to enlarge here?
 23 Q. That's fine.
 24 Can you remember whether during those initial
 25 discussions — well, first of all, actually, who was the

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1 first person — not Philip Heath, so outside of
 2 Kingspan — that you had an initial discussion with,
 3 either from the LABC or Herefordshire?
 4 A. Okay, so when I wrote my witness statement, I couldn't
 5 remember the name of the person, and I couldn't remember
 6 if the person was from LABC or Herefordshire Council.
 7 Since then, I wrote my witness statement, I've now
 8 determined, through obviously further emails and so
 9 forth, that the person I spoke to at LABC was,
 10 I believe, Barry Turner.
 11 Q. Yes.
 12 A. And there was another chap, who I can't remember his
 13 name, but the conversation basically revolved around the
 14 fact that they were going to appoint somebody else to do
 15 the certification, not them.
 16 Q. Yes.
 17 A. That pointed to Herefordshire Council, and then the
 18 person at Herefordshire Council that would be contacting
 19 me to set up a meeting at Pembridge was David Jones.
 20 Q. Yes, all right. And that was all in November 2008,
 21 wasn't it?
 22 A. This would have been November/December 2008, yes.
 23 Q. Right.
 24 In those initial discussions, either with
 25 Barry Turner or with David Jones, did you tell the LABC

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1 or Herefordshire anything about K15 as a product?
 2 A. So LABC were not involved in the initial meeting.
 3 Q. No.
 4 A. There was one meeting that occurred and that was in
 5 November.
 6 Q. Ah, now, hang on, I'm going to come to the meeting.
 7 A. Oh, okay.
 8 Q. Because we need to talk through that. But what I'm
 9 asking now is prior to that meeting —
 10 A. Okay.
 11 Q. — did you share any information either with
 12 Barry Turner or David Jones about K15? No.
 13 What did you come to understand during those initial
 14 discussions — so, again, before the meeting that you
 15 have referred to — about the LABC system approval
 16 process and how it would work, for example?
 17 A. We had to wait till the meeting to find that out.
 18 Q. I see, so it was a mystery until then?
 19 A. Correct.
 20 Q. All right.
 21 What did you understand when you went into this
 22 project to be the purpose of obtaining a certificate for
 23 K15 from the LABC?
 24 A. So my understanding was that LABC was seen as
 25 an industry body that had good influence throughout the

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1 local authority building control departments, that had
 2 a database of products that had been through their
 3 vetting system to show that you could use this
 4 product — or consider this product, not to use it but
 5 to consider this product. So, in other words, it was
 6 a database set up by LABC that if I was a local
 7 authority building control officer working in
 8 a particular county in the UK, if I had an enquiry come
 9 across my desk with a particular product on it, they
 10 could look to this system to say, "Oh, okay, LABC, is
 11 this product on their system? Yes, it is, they've
 12 obviously looked at it."
 13 But it was never a sign-off for building regs
 14 approval; it was more of a case of: this is an industry
 15 body that gave some credence to consider your product to
 16 be used on a project. But it was never a sign-off for
 17 the Building Regulations. So the idea was that then
 18 once you were on this database or this approval system,
 19 the idea then is that when somebody had a project, they
 20 could see that it had been checked by LABC, but you
 21 still had to do your due diligence in terms of making
 22 sure it complied with all of the relevant approved
 23 documents, ie part B, part L, et cetera.
 24 Q. I see. Where did you learn all of that from, about the
 25 LABC?

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1 A. That would have been — I remember an article in
 2 a magazine, I remember a book coming through in the
 3 post, there was a lot of advertising going on around at
 4 the time, years before this, that sort of mentioned that
 5 LABC are here to help local authorities around the
 6 country. Because a lot of local authorities in the UK,
 7 they used to receive an enquiry, and not always were the
 8 local authority up to speed on a lot of the information,
 9 so they used to use the LABC to update their knowledge
 10 and technical knowledge. So the LABC started putting
 11 out flyers and articles and books to say, "Look, we are
 12 this industry body that you can come to for advice".
 13 And it wasn't just the local authorities; I mean,
 14 I used to remember enquiries that I used to deal with,
 15 I used to ring LABC direct over the course of my time at
 16 Kingspan.
 17 Q. All right.
 18 I want to take you just very briefly to your witness
 19 statement where you cover some of that, actually. There
 20 is just something I want to ask you about it.
 21 So back to {KIN00008702/35}, please. If we look at
 22 paragraph 7.52, this is really what you have just
 23 explained:
 24 "We had the initial discussion with the LABC because
 25 we wanted to ask them how we could, when we received

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1 enquiries, say that our product had been vetted and
 2 checked out by the LABC ..."
 3 And so on. That's essentially what you have just
 4 explained; yes?
 5 A. Sorry, can I just —
 6 Q. Yes, of course.
 7 A. Yes, correct, yes, yes, "vetted and checked out by the
 8 LABC as a product that could be considered", correct.
 9 Q. It says in the third line:
 10 "... as a product which could be considered for use
 11 both above and below 18m."
 12 Do you see that?
 13 A. Yes.
 14 Q. Then you go on to say:
 15 "Of course, this was subject to the system build-up
 16 in which it was proposed to be used on a project
 17 complying with Approved Document B."
 18 Yes? Do you see that?
 19 A. Yes.
 20 Q. I just want to ask you: you say there — it's the fourth
 21 line down — "Of course, this was subject to the system
 22 ... complying with [ADB]". Why do you say that? Do you
 23 say that because it's something obvious?
 24 A. I don't know why I put the words "of course".
 25 Q. All right.

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1 Was it — let me put it differently — obvious to
 2 you — I'm sorry, I need that back, actually. If we
 3 just go back to {KIN00008702/35}, thank you.
 4 Was it obvious to you that the LABC's approval
 5 system or system of vetting and checking and allowing
 6 people to look products up on their database, in the
 7 case of K15, was all subject to the whole system
 8 build-up complying with ADB?
 9 A. Initially, no. Actually I believe that — and we'll get
 10 into this later on, but I believe that the LABC — we
 11 went to the LABC just on our product to start with.
 12 Q. I see.
 13 A. And it was — in fact, it was during the course of that
 14 that it came out that we could do it as a system.
 15 Q. How did it come out during the course of that?
 16 A. That was — so when we approached — sort of skipping
 17 a bit here, but when we went with LABC, and then
 18 obviously it was during — because we haven't discussed
 19 about the meeting at Pembridge yet, so I wanted to sort
 20 of — but —
 21 Q. So it was during the meeting?
 22 A. When we originally — when we eventually got the meeting
 23 in Pembridge with not LABC, Herefordshire Council —
 24 Q. Yes.
 25 A. — when we sat down and discussed it, there was myself,

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1 I believe also the technical manager, Philip Heath, was
 2 in that meeting too —
 3 Q. Yes.
 4 A. — and David Jones from Herefordshire Council was in
 5 that meeting, and we explained to him that we wanted to
 6 look at our product above and below 18 metres and
 7 understand how we could look at the product. It was
 8 only when Herefordshire Council went away and then they
 9 obviously must have spoken to LABC, that they came back
 10 and said, "Actually, we have another approach now, we
 11 can approach this as a system approval". So that's how
 12 it went from us just looking at it as a product to
 13 moving to a system approval.
 14 Q. So just so that I'm clear — and you're quite right, we
 15 are going to come back to the meeting — you and
 16 Philip Heath had approached it from the point of view of
 17 trying to obtain an LABC certificate for K15 above and
 18 below 18 metres as a standalone product, that was your
 19 initial thinking; yes?
 20 A. Yes, it was to get the product to be looked at as
 21 a product, yes.
 22 Q. But then at the meeting — is this right? — that's what
 23 you suggested, and David Jones suggested that in fact it
 24 needed to be, or could be, rather, on a system basis?
 25 A. Correct, yes.

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1 Q. So that all happened during the meeting or afterwards?
 2 A. No, this was — so he went away and did his due
 3 diligence.
 4 Q. I see.
 5 A. Because we wanted the product, just like we'd done with
 6 the previous one for our tapered insulation, we wanted
 7 it to be looked at just as insulation. He then went
 8 away, did his due diligence, came back in the New Year,
 9 I think it was around about January, and said, "I've
 10 come up with a way we can look at this that will enable
 11 us to go forward, to look at it as a system rather than
 12 just an individual", and that's why they called it
 13 a system type approval.
 14 Q. Yes, I see. And there was only one meeting, wasn't
 15 there?
 16 A. Correct.
 17 Q. So when he came back to you, you think in January, that
 18 was in writing; yes?
 19 A. Yes.
 20 Q. Yes, all right. We are going to come on to that.
 21 Can you just help me with this, very briefly: when
 22 you say that initially you had intended to approach the
 23 LABC for a certificate for K15 as a standalone product
 24 for use above and below 18 metres, just help me to
 25 understand: how could a certificate be given for K15 as

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1 a standalone product to be used over 18 metres, given
 2 what you knew about 8414 as a system test?
 3 A. Yeah, well, that's why obviously — and you've got to go
 4 back now to 2008, and we were obviously discussing: how
 5 do we as an industry look at this?
 6 Q. I see.
 7 A. We were looking — that's exactly why we had the
 8 meeting. I mean, we had a team behind us that obviously
 9 wanted to put this product out into the marketplace, but
 10 before we can do that, we need to understand: what can
 11 we do? So obviously one of the first things I said
 12 to — presented what we wanted with our product, we
 13 looked to LABC because they were the industry body, they
 14 knew what they were doing, but actually it was
 15 Herefordshire Council that was doing the meeting, not
 16 LABC.
 17 Q. Yes.
 18 A. Herefordshire Council looked at what we were trying to
 19 do. They obviously, for what — looked at — did their
 20 due diligence, came back and said, "Look, we can't take
 21 this on as a product on its own", which I agreed and
 22 everybody agreed with, so we stopped it as a standalone
 23 product — because if you go back to the original
 24 question, where you were asking what was my idea about
 25 LABC, it wasn't really to do with fire in my mind. LABC

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1 was an industry body that covered many different topics,
 2 not just fire. So when we were looking at this product
 3 and at the initial meeting, my initial meeting was not
 4 about fire, it was more about this system that they had
 5 that allowed architects and consultants to first of all
 6 see the product, to see that it had been flagged up as
 7 a material, let alone getting into the detail of fire
 8 and thermal and moisture.
 9 So when we mentioned that we had this product and we
 10 wanted to be able to use it on buildings above and below
 11 18 metres, that wasn't saying we have all the
 12 certification in place to say we can do that; it was
 13 more of a question of: we have this product, we want to
 14 bring it to market, we want to be able to use it below
 15 18 metres and obviously above 18 metres, although most
 16 of the projects that we mostly had were below 18 metres
 17 in the UK, and then they went away, did their due
 18 diligence. They then came back and said, "I think the
 19 best way forward for this to be able to comply with the
 20 various" — obviously whatever they had been looking at,
 21 was a system approval.
 22 MS TROUP: Yes, all right, thank you.
 23 Mr Pack, I'm going to pause there for a moment,
 24 because I see that it's just after 1.00, and hand over
 25 to ask the Chairman whether this might be a good time to

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1 stop for lunch.
 2 SIR MARTIN MOORE—BICK: Yes, thank you very much. I think
 3 it would, wouldn't it?
 4 We will break now so that we can have some lunch and
 5 you, Mr Pack, can also have some refreshment if you so
 6 wish. We will start again at 2 o'clock our time,
 7 please, and please remember not to talk to anyone about
 8 your evidence or anything to do with it while we're in
 9 the break. All right?
 10 THE WITNESS: Thank you.
 11 SIR MARTIN MOORE—BICK: See you later on. Thank you very
 12 much indeed.
 13 THE WITNESS: Thank you.
 14 (1.02 pm)
 15 (The short adjournment)
 16 (2.00 pm)
 17 SIR MARTIN MOORE—BICK: Hello, Mr Pack. We are back with
 18 you, or at least I hope we are. Are you there?
 19 THE WITNESS: Yes, good afternoon, I am here.
 20 SIR MARTIN MOORE—BICK: Good afternoon, so you can see me
 21 and hear me?
 22 THE WITNESS: Yes, I can.
 23 SIR MARTIN MOORE—BICK: Good, thank you very much. Well, we
 24 can see you and hear you very clearly. So I will invite
 25 Ms Troup then to carry on, if you are ready to continue?

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1 THE WITNESS: Yes, I am, thank you.
 2 MS TROUP: I am.
 3 SIR MARTIN MOORE—BICK: Very good.
 4 Yes, Ms Troup.
 5 MS TROUP: Mr Pack, I am going to take you first to the
 6 email that I think you were referring to just before we
 7 broke for lunch, so if we could have a look, please, at
 8 {KIN00024981}. While that's coming up, this is the
 9 first of the 21 documents that was provided very
 10 recently to the Inquiry, and which I will now put to
 11 you.
 12 If we can go to the bottom of that, please, page 1
 13 at the very bottom, we can see this is an email sent on
 14 14 November 2008 from Barry Turner of the LABC to
 15 someone called Chris George at Kingspan.
 16 If we now go down to page 2 {KIN00024981/2}, we can
 17 see that Tony Millichap is copied in. Do you see that?
 18 A. Yes, I do.
 19 Q. Essentially, what is attached here — this is about
 20 an LABC document to do with Kingspan's tapered roofing
 21 insulation products.
 22 A. Yes.
 23 Q. If we go up, please, to the next email up
 24 {KIN00024981/1}, we can see that Tony Millichap forwards
 25 Barry Turner's email to Philip Heath, to you, and to

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1 Gareth Mills, and he's obviously quite pleased with it.
 2 Do you see that?
 3 A. Yes, I do.
 4 Q. If we go now to the top, to Mr Heath's email, which is
 5 16 November, is this the email you were referring to?
 6 It's sent to you, Mr Meredith and Mr Mills, and in it
 7 Mr Heath says:
 8 "Please advise if we can get one of these for K15 in
 9 relation to its use above [and] below 18m ..."
 10 A. That's correct.
 11 Q. All right.
 12 If we go to the next new document, please,
 13 {KIN00024982}, in the middle of the page we see the same
 14 email from Barry Turner to Chris George and
 15 Tony Millichap from 14 November. Do you have that?
 16 A. Yes, I do.
 17 Q. If we go up, please, to the top email, there we see that
 18 on 21 November you have in fact contacted Barry Turner
 19 of the LABC.
 20 A. Yes, correct.
 21 Q. And you say that you have left him a voicemail.
 22 A. Yes.
 23 Q. Am I right in thinking that that was you essentially
 24 taking on this job in response to Mr Heath's email we've
 25 just looked at?

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1 A. Yes.
 2 Q. Right.
 3 If we move to the next one, please, going through it
 4 briefly, it's {KIN00024983}. Halfway down the page we
 5 can see Barry Turner's response to you on the same day,
 6 21 November, quite late in the evening, 20.59; yes?
 7 A. Yes.
 8 Q. "Sorry I did not get back to you today", he says that he
 9 has been tied up, and at the end of that email, "Will
 10 hopefully catch up with you on Monday".
 11 A. Yes.
 12 Q. If we go up in that email chain, please, to the top,
 13 there's your email back to him on 24 November, which is
 14 the Monday:
 15 "Dear Barry
 16 "Thank you for your email, I have tried you a couple
 17 of times this morning, I would be grateful if you could
 18 ring me when you are free."
 19 Yes?
 20 A. Yes.
 21 Q. So by 12.23 on 24 November you had already tried to ring
 22 Barry Turner a couple of times.
 23 A. Yes.
 24 Q. Right.
 25 Then moving on, please, to {KIN00024984}. Just

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1 looking at the top email, this is the next day,
 2 25 November. You email Mr Turner again before 10 am:
 3 "Barry
 4 "Please can you update me as to the Business
 5 Development person that is going to contact me and when
 6 this is likely to be."
 7 How did you know that that was the next stage? Do
 8 you think you had spoken to Barry Turner before you sent
 9 this email?
 10 A. I cannot recall.
 11 Q. All right.
 12 I want to ask: there are a lot of emails from you
 13 here to him; from your point of view, Mr Pack, was there
 14 some urgency to this project, to obtaining this
 15 certificate?
 16 A. No. No urgency. For whatever reason, I've obviously
 17 tried to contact him, he's tried to contact me, he's
 18 obviously busy, but there was no urgency from my point
 19 of view.
 20 Q. All right.
 21 Let's go now to the meeting that we've referred to
 22 a few times, and you've confirmed, I think, that
 23 David Jones of Herefordshire building control was
 24 present; yes?
 25 A. Yes, correct.

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1 Q. And that your line manager, Philip Heath, was also
 2 present?
 3 A. Yes, correct. Now, I only know that from reading and
 4 also hearing — at the time I couldn't remember who was
 5 in the room, but it's come out that he was the person
 6 that was present.
 7 Q. Yes, fine.
 8 In terms of when the meeting took place, I don't
 9 think we need to go to it, but in your witness
 10 statement — and this is, just for the transcript,
 11 {KIN00008702/37}, paragraph 7.61 — you say that you
 12 thought David Jones was present and that the meeting
 13 took place not long before May 2009. Do you remember
 14 saying that in your witness statement?
 15 A. No.
 16 Q. All right. Do you think that's right, now, thinking
 17 about it?
 18 A. No, I didn't say the meeting took place in May 2009.
 19 Q. Let's go to it, so that I don't cause any confusion.
 20 Could I have up, please, {KIN00008702/37}. We're
 21 looking at the last two lines of that paragraph, 7.61:
 22 "I believe that David Jones of LABC will have been
 23 present and that the meeting took place not long before
 24 May 2009."
 25 A. Correct, yes. That's not saying it was May 2009.

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1 Obviously when I did this statement, a lot of the
 2 information that we initially had wasn't available, but
 3 I knew it was before May 2009 because that was when the
 4 certificate was produced, so it had to be before
 5 May 2009.
 6 Q. Yes, I understand. All right, well, let's have a look
 7 at another email chain which will assist us. It's
 8 {KIN00024987}. I don't think we need to go through it
 9 all, but if you look at the top email, please, you can
 10 see that you are emailing David Jones on November 27,
 11 and that you say there:
 12 "Dear David
 13 "2pm on Friday the 5th is fine ... ask for me at
 14 main reception."
 15 That's Friday, 5 December, and that's the meeting
 16 that's been arranged; do you accept that?
 17 A. That's correct.
 18 Q. All right, so we know that the meeting took place on
 19 5 December 2008.
 20 I want to talk to you about what occurred at the
 21 meeting. If we can go, please, to your witness
 22 statement again at {KIN00008702/37}. If we look at
 23 paragraph 7.62, in the first line, about halfway along
 24 the first line, talking about this meeting, you say:
 25 "I don't recall that we specifically discussed the

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1 suitability for use of K15 over 18m ..."
 2 And you go on from there.
 3 Just stopping there, is there any reason you would
 4 not have discussed with David Jones the suitability for
 5 use of K15 over 18 metres?
 6 A. I cannot recall the actual discussion that took place
 7 around that topic.
 8 Q. All right. Well, bearing in mind that when Mr Heath
 9 first emailed the three of you —
 10 A. Yes.
 11 Q. — Mr Meredith, you and Mr Mills, what he had said
 12 was — we've just looked at it — "Can we get one of
 13 these for K15 above and below 18 metres"; bearing in
 14 mind that that was his initial purpose, if you like, do
 15 you think there is any reason you wouldn't have
 16 discussed the suitability of the product for use over
 17 18 metres?
 18 A. I think it would have gone along the lines of: we're
 19 looking at K15 as an insulation board and we will be
 20 looking at buildings below and above 18 metres, but
 21 whether we actually discussed the suitability of it,
 22 that was left for LABC to confirm that. We were looking
 23 for something that was similar to what had been done
 24 before, using K15, and I'm sure in that meeting we would
 25 have discussed below 18 metres and above 18 metres.

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1 Q. You're sure you would have done?
 2 A. I'm sure we would have discussed above and below
 3 18 metres, yes.
 4 Q. All right.
 5 I want to take you to show you David Jones'
 6 recollections of the meeting. Those are set out in his
 7 witness statement. So if we can get that up, please,
 8 it's {HBC00000029/9}, please.
 9 Do you see that at the bottom of the page he is
 10 talking about this meeting, and he says:
 11 "From memory, the main themes of that meeting
 12 were ..."
 13 Then if we go over the page to page 10
 14 {HBC00000029/10}, please:
 15 "The Kingspan representatives gave an overview of
 16 the product and its properties, and how/where it was
 17 intended to be used. In particular, the technical
 18 representatives were enthusiastic about the fire testing
 19 that Kingspan had commissioned for K15, and the fact
 20 that it had been shown to be suitable for use in
 21 buildings with storeys over 18m."
 22 Do you remember that?
 23 A. I don't remember being enthusiastic, no.
 24 Q. Do you think he is wrong about that?
 25 A. All I can recall is that we had brought along to the

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1 meeting a copy of our K15 product literature, and we
 2 brought along with us our BBA certificate. We brought
 3 no fire testing data into the meeting.
 4 Q. No.
 5 A. So I couldn't have been very enthusiastic about
 6 fire testing data if I had nothing in front of me.
 7 I do remember that we spoke about the fact that we
 8 wanted to be able to look at this product for use above
 9 and below 18 metres, but for us to be enthusiastic about
 10 the fire testing, from my point of view, I don't recall
 11 me being enthusiastic about the fire testing.
 12 Q. Well, he says about the fire testing that Kingspan had
 13 commissioned for K15. That's in the third line.
 14 I mean, that might be past or future fire testing.
 15 Do you remember talking with David Jones about
 16 fire testing at all for K15?
 17 A. I remember mentioning that we had done a large-scale
 18 fire test. I remember having the BBA certificate.
 19 Q. Yes.
 20 A. I referred to that particular section in the
 21 BBA certificate. I would have mentioned that we had
 22 done a fire test, because obviously we wanted to
 23 understand how we could take that particular fire test
 24 and the BBA certificate and the literature and how do we
 25 go forward from here.

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1 Q. Yes, I see. So when you mentioned that you had done
 2 that particular fire test, do I understand correctly
 3 that you mentioned that to David Jones still without
 4 having read that test report and still without knowing
 5 what the test had been conducted on?
 6 A. So the — when we were sat at the meeting, I cannot
 7 recall exactly the words we discussed, but obviously my
 8 line manager was there. He —
 9 Q. Yes.
 10 A. The technical manager. He would have no doubt been able
 11 to pick up those questions because he was the person
 12 that was directly involved with that side of the
 13 business.
 14 Q. Yes, I understand.
 15 A. So —
 16 Q. But going back to what you have just told us, which is
 17 that you mentioned the BS 8414 test, do I understand
 18 correctly that you did that and that you went into that
 19 meeting with Mr Jones without having read the 8414 test
 20 report and still not knowing what the test had been
 21 conducted on?
 22 A. Yes, as far as I was concerned, we had a test that was
 23 based on 8414 with a non-combustible substrate and
 24 a non-combustible cladding.
 25 Q. The documents you took with you into the meeting were

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1 the BBA certificate and the product literature, K15's
 2 product literature; yes?
 3 A. Correct.
 4 Q. Had they been requested by David Jones or did you and
 5 Mr Heath just bring them along to offer them to him?
 6 A. I cannot recall that.
 7 Q. Fine.
 8 Do you remember telling David Jones that K15 was
 9 suitable for use over 18 metres?
 10 A. I would have discussed the fact that we were looking to
 11 the use of K15 above 18 metres and how we could move
 12 this forward, based upon the fact that we had
 13 a fire test based upon a non-combustible background and
 14 a non-combustible cladding.
 15 Q. All right.
 16 I need to take you back to the witness statement
 17 actually, please. So it's {HBC00000029/10}. If we look
 18 at the second paragraph, he says there:
 19 "I asked what Kingspan hoped to achieve from the
 20 LABC type approval process, given the supporting
 21 information they already had in the form of test results
 22 and a BBA certificate. The response was that it was
 23 very much a marketing aim to have the LABC brand
 24 associated with their product, and they wanted the
 25 opportunity to further emphasise the suitability of K15

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1 in buildings over 18m, again for marketing purposes."
 2 Now, before I ask you about that, could we go to
 3 page 20 of this statement {HBC00000029/20}, please, to
 4 the first paragraph. At the third line down, halfway
 5 along, do you see the word "Furthermore"?
 6 A. Yes.
 7 Q. Mr Jones says there:
 8 "Furthermore, they wanted the opportunity to further
 9 emphasise the suitability of K15 in buildings over
 10 18 metres, again for marketing purposes. This latter
 11 point seemed to me to be significant to Kingspan, who
 12 wanted to capitalize on the testing which had been
 13 carried out and the very recent issue of BBA certificate
 14 08/4582 (Appendix C) which incorporated details of those
 15 tests."
 16 Do you recall emphasising the suitability for use of
 17 K15 over 18 metres or that being a significant point for
 18 you and Mr Heath during the meeting?
 19 A. I think the document was not necessarily just about over
 20 18 metres. As I said earlier on in my witness statement
 21 today —
 22 Q. No, I'm not asking about the document. If you can,
 23 please, in terms of concentrating on what was said at
 24 the meeting — and I appreciate it's difficult — do you
 25 think he is wrong in his recollection that the

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1 suitability for use of the product over 18 metres was
 2 significant for you and Mr Heath? Do you say that
 3 Mr Jones is wrong about that?
 4 A. Yes.
 5 Q. Do you say that he is wrong in his recollection that you
 6 and Mr Heath wanted to capitalise on the testing which
 7 had been carried out?
 8 A. Yeah, I wouldn't use the word "capitalise".
 9 Q. No, sure, you might not use that word, but build on
 10 then?
 11 A. No, I think if you look at the actual meeting itself, it
 12 wasn't solely about above 18 metres.
 13 Q. No.
 14 A. For us to capitalise on that, no, I disagree with that.
 15 We wanted a document that would cover in general above
 16 and below 18 metres.
 17 Q. Yes. I'm aware, of course, that you might have
 18 discussed other issues at the meeting. I want to take
 19 your comments on Mr Jones' recollections, and his
 20 recollection is that a significant point for you and
 21 Mr Heath appeared to be the testing which had been
 22 carried out, and capitalising on that and the recent
 23 issue of the BBA certificate. You don't remember that
 24 being a significant —
 25 A. I don't recall that, no.

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1 Q. If we can go back to {HBC00000029/9}, to the penultimate
 2 paragraph. Do you see it begins, "To the best of my
 3 recollection"?
 4 A. Yes.
 5 Q. He says there:
 6 "To the best of my recollection, Andrew Pack led
 7 that meeting for Kingspan ..."
 8 A. Yes.
 9 Q. "... and I recall there being at least one other person
 10 from Kingspan in attendance ..."
 11 Did you lead that meeting?
 12 A. I led the meeting inasmuch as I met him at the reception
 13 area and I greeted him upstairs to meet my technical
 14 manager. But as to I led the meeting, I mean, it
 15 depends on which topics we're referring to here, because
 16 there was obviously three of us in the meeting. It was
 17 not led by myself. There was many different discussions
 18 that took place in the room. So I wouldn't say
 19 I actually led the meeting. Okay, I actually met
 20 Mr Jones at reception, brought him up to the room,
 21 brought my technical manager in, we had the meeting, we
 22 obviously spoke about different things, and then I led
 23 Mr Jones down to reception. But I wouldn't say
 24 I actually led the meeting. I guess it comes back to
 25 what you mean by led the meeting. Do you mean taking

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1 minutes and —

2 Q. I don't know, I'll have to ask Mr Jones what he means by

3 led the meeting. I would assume — and I am guessing —

4 that he means was in charge of the meeting from

5 Kingspan's side, did most of the talking, perhaps, took

6 the lead. I don't think he means met him at reception.

7 Let me put it differently. I think your answer is

8 that you disagree with him. Of you and Mr Heath, as far

9 as you can recall, who did most of the talking?

10 A. I cannot remember.

11 Q. Did you tell David Jones at any time during the course

12 of that meeting that K15 was suitable for use over

13 18 metres without condition or qualification?

14 A. I cannot recall saying that. I would have shown the

15 information that we had, I would have discussed that we

16 have done a fire test, and I would have said that the

17 fire test was based upon a non-combustible background

18 and a non-combustible cladding.

19 Q. Why did you not bring the test report to offer to

20 Mr Jones during the meeting?

21 A. Because I didn't have access to the test reports.

22 Q. Is it something you discussed with Philip Heath

23 beforehand?

24 A. No.

25 Q. Neither of you raised the possibility of offering that

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1 test report to David Jones?

2 A. No.

3 Q. Right.

4 Did Philip Heath at any time during the meeting, as

5 far as you can recall, tell David Jones that K15 was

6 suitable for use over 18 metres without condition or

7 qualification?

8 A. I cannot recall.

9 Q. You have said that you discussed the fire test that had

10 been carried out — well, let me ask you this first:

11 were you clear with David Jones that there was one

12 large-scale fire test and no others?

13 A. I cannot recall the actual wording, but we would have

14 shown — as we had the documents in the meeting —

15 Q. Yes.

16 A. — we would have shown the BBA certificate and the

17 product literature.

18 Q. Yes.

19 A. So that would have been the reference to what was

20 discussed.

21 Q. Did either you or Philip Heath, as far as you can

22 recall, tell David Jones that K15, in December 2008,

23 when you met him, was suitable for use over 18 metres

24 only in one specific configuration?

25 A. I cannot recall the words we actually used, but I would

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1 have emphasised that it was based upon a non-combustible

2 substrate and a non-combustible cladding.

3 Q. It would have been quite important during the course of

4 that meeting, do you agree, that David Jones was not

5 misled or led to believe that K15 could be used in all

6 situations over 18 metres?

7 A. Yes, I agree. And that's why, when the course,

8 following that meeting, if you look at the LABC, in the

9 end it only covered non-combustible, or I should say

10 limited combustible substrate and limited combustible

11 cladding.

12 Q. We're coming to that.

13 A. Okay.

14 Q. During the course of the meeting — we don't need to go

15 to it, actually — David Jones tells us in his witness

16 statement that he had no training in relation to the use

17 of materials in buildings over 18 metres, and that there

18 are no high-rise buildings in Herefordshire so he had no

19 experience in that area. For the transcript, that's at

20 {HBC00000029/5}, in the penultimate paragraph.

21 What I want to ask you is this: did Mr Jones' lack

22 of experience in that particular area, the use of

23 materials over 18 metres, become apparent to you at any

24 stage during the course of the meeting?

25 A. No.

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1 Q. You have talked about the documents you brought to the

2 meeting. I want to just go to that for now.

3 If we go to, please, {KIN00020714}, this is an email

4 we're going to come back to in a short while, but there

5 are just a couple of things I want to ask you about it

6 now.

7 If we can go up a little, please, so that we can see

8 the top of that. There we are. If you look at the

9 third email down in the chain, that is the email that

10 Philip Heath sent to various mailing lists on the

11 afternoon of 7 May, announcing that the LABC certificate

12 had been obtained.

13 Have you seen that before?

14 A. Yes, I have.

15 Q. Did you see that email at the time?

16 A. I don't recall the email at the time, no.

17 Q. Would you not have been on Kingspan's technical services

18 mailing list?

19 A. I think I was — yeah, I think — I mean, obviously

20 you're asking me do I recall at the time. I can't

21 recall at the time, but I have seen it since the —

22 Q. Fine.

23 A. — whole Inquiry and I have been looking through the

24 emails, but I couldn't hold hand on heart and say

25 I remember that email, but I have read it since, yes,

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1 during the Inquiry.
 2 Q. All right.
 3 At the next email up in the chain, do you see the
 4 email from Malcolm Rochefort to Philip Heath on the same
 5 day, at 4.10?
 6 A. Yes, I do.
 7 Q. He says:
 8 "Out of curiosity, which fire test result(s) did we
 9 use to get this?"
 10 I appreciate you weren't copied in to this, but
 11 I think you have seen these before?
 12 A. Yes, I have, since the Inquiry.
 13 Q. Yes, fine.
 14 Philip Heath's response at the top of the page is
 15 this:
 16 "We can be very convincing when we need to be, we
 17 threw every bit of fire test data we could at him, we
 18 probably blocked his server, in the end I think the LABC
 19 convinced themselves Kooltherm is the best thing since
 20 sliced bread. We didn't even have to get any real ale
 21 down him!"
 22 First of all, do you agree that that email,
 23 Philip Heath's email, gives the impression that he was
 24 quite surprised at how convincing you and he had been
 25 able to be with the LABC?

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1 A. Yes, and I totally disagree with that email.
 2 Q. You disagree with his email?
 3 A. Yes.
 4 Q. What do you disagree with?
 5 Can we have it back up, please? So sorry, it's
 6 {KIN00020714}.
 7 What do you disagree with about it?
 8 A. Well, first of all, we never actually provided any
 9 fire test data --
 10 Q. No.
 11 A. -- other than what was in the actual BBA certificate and
 12 the literature. I would have thought during the actual
 13 whole process, and obviously this is where I guess you
 14 need to look at the whole procedure that was at the
 15 time, we were never asked to provide any fire test data
 16 during the whole course of this process.
 17 Q. No.
 18 A. I mean, at the initial meeting I presented the
 19 literature, I presented the BBA. It was the only
 20 information that I had access to.
 21 Q. Yes.
 22 A. Following that meeting, obviously, Herefordshire Council
 23 went away to do their due diligence, understand how they
 24 could move this forward --
 25 Q. Yes.

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1 A. -- and then obviously, once the New Year came, they came
 2 back with what they said was the right way to go
 3 forward.
 4 Q. All right. We'll come on to that.
 5 A. But there was no fire test data given whatsoever, so
 6 I can't see how we blocked the server.
 7 Q. No. I mean, putting it plainly, that's nonsense, isn't
 8 it?
 9 A. Yes.
 10 Q. At the meeting you gave him the BBA certificate and
 11 Kingspan's product literature at the time, and after the
 12 meeting -- so between your meeting on 5 December 2008
 13 and the certificate being issued in May 2009 -- you did
 14 not send him anything else, did you, in terms of data or
 15 certificates?
 16 A. Correct, and we were never asked for anything.
 17 Q. Let's look, please, at the BBA certificate, which is the
 18 one that you will have presented to him at the meeting
 19 on 5 December 2008.
 20 Well, we'll come to it. I want to ask you first:
 21 I think you say -- we don't need to go to it -- in your
 22 witness statement -- and for the transcript, this is at
 23 paragraph 7.1 on {KIN00008702/23} -- that you did not
 24 have any direct involvement in the BBA certification
 25 process; is that right?

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1 A. That's correct.
 2 Q. Before presenting the BBA certificate to David Jones at
 3 your meeting in December 2008, had you read it?
 4 A. I would have read sections of it, yes. I would have
 5 been --
 6 Q. Would you not have read the whole document?
 7 A. Not necessarily, no. I mean, obviously it was
 8 a document that contained many different sections, not
 9 just about fire. You have thermal, you have moisture --
 10 Q. Yes.
 11 A. So, I mean, to read it before the meeting, no,
 12 I wouldn't have done that. I would have been familiar
 13 with the sections of the BBA and how it was broken up.
 14 Q. All right. Let's take a look at it together. That
 15 document is at {BBA00000038}. This is the first
 16 BBA certificate for K15, and if you look at the bottom
 17 of this page, page 1, it says, on the left-hand side:
 18 "Date of First Issue: 27 October 2008."
 19 So can we agree, Mr Pack, that this is the version
 20 or the issue that you will have shown to David Jones in
 21 December 2008?
 22 A. Yes.
 23 Q. All right.
 24 If we look, it's just towards the top of the screen
 25 I can see now, there is a section, under the heading

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1 "Key factors assessed", in bold, the first section is
 2 "Thermal performance", then "Condensation risk" and then
 3 we see a section, "Behaviour in relation to fire". Do
 4 you have that?
 5 A. Yes, I do.
 6 Q. It says:
 7 " ... the boards will not contribute to the
 8 development stages of a fire or present a smoke or toxic
 9 hazard ..."
 10 Had you read that phrase before your meeting with
 11 David Jones?
 12 A. No, I hadn't.
 13 Q. You hadn't read it at all?
 14 A. I can't recall reading it before the meeting, no.
 15 Q. Right. Do you know what it means?
 16 A. It sounds as if it's saying that the boards won't
 17 contribute to the development stages of a fire or
 18 present a smoke toxic hazard.
 19 Q. Yes.
 20 A. So is this the wording from the BBA, or is this ...?
 21 Q. Well —
 22 A. This is the BBA writing this document, isn't it, so —
 23 Q. I'm sorry, I'm overspeaking you. Go ahead.
 24 A. I'm assuming this is a standard document that the BBA
 25 produces that obviously covered these three or four

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1 points, and the BBA have come up with this wording. How
 2 they've come up with the wording I don't know.
 3 Q. No, that's fine. I don't intend to ask you about how
 4 they have come up with that wording, I'm just actually
 5 interested in your interpretation of what those words
 6 mean.
 7 A. Okay. Well, it's mentioned that the boards will not
 8 contribute to the development stages of a fire.
 9 Q. It sounds, would you agree, that it's essentially saying
 10 that K15 boards won't catch fire?
 11 A. "Will not contribute". I guess, it's how much does it
 12 mean contribute.
 13 Q. All right. Well, let's —
 14 A. It's not the best wording, I have to say, reading it.
 15 Q. Did you say it's not the best wording?
 16 A. It's not the best wording, because this says the boards
 17 will not contribute, but what does it by mean by
 18 contribute?
 19 Q. Indeed.
 20 Let's go on to page 5 of this certificate
 21 {BBA00000038/5}, please, and section 7, which I think
 22 starts towards the bottom of page 5. So this is the
 23 detailed section on behaviour in relation to fire.
 24 If we look at the first bullet point, there is
 25 a description there of the test to BS 8414—1; do you see

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1 that?
 2 A. Yes, I do.
 3 Q. It's quite long, and I don't intend to take you through
 4 all of that, but if we can just look at the last three
 5 lines. So if you look at the third line up from the
 6 bottom, right to the end of that line at the word
 7 "Within".
 8 A. Yes.
 9 Q. "Within the stated test time the temperature at the
 10 level 2 thermocouples did not exceed 600°C, therefore
 11 displaying limited fire spread away from the fire source
 12 and that the product meets the criteria stated within
 13 BRE 135."
 14 Had you seen that before?
 15 A. No.
 16 Q. Do you agree, looking at it now, that it is not correct
 17 to state that the product meets the criteria within
 18 BR 135?
 19 A. I must admit, because I'm not familiar with the workings
 20 of BR 135, I'm not familiar with this sentence.
 21 Q. No. You —
 22 A. I cannot comment on whether the sentence is right or
 23 wrong. I'm assuming the BBA have wrote this document,
 24 so —
 25 Q. Yes, but — go ahead.

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1 A. Yeah, I'm assuming the BBA has wrote this document, so
 2 they must follow a procedure where they've come up with
 3 this wording.
 4 Q. I don't want you to worry too much about the authorship
 5 of it. Really what I'm trying to get is your
 6 understanding of the meaning of it.
 7 You have told us a number of times that you
 8 understand BS 8414 to be a system test.
 9 A. Yes.
 10 Q. And that the system tested is assessed against the
 11 criteria in BR 135; yes?
 12 A. Correct.
 13 Q. All I'm asking you in very simple terms is whether you
 14 agree with me that it is incorrect to state that
 15 a product as a standalone product, one component, meets
 16 the criteria in BR 135?
 17 A. Yes, I agree.
 18 Q. Right.
 19 I just want to take you, please, to an email chain
 20 in 2009. It's {KIN00009103}. If you look at the top of
 21 that page, we can see that this is an email from
 22 Philip Heath to you, and again to Mr Meredith and
 23 Mr Mills, copied to Gwyn Davies on 5 March 2009. Then
 24 if we can go down, please, to the bottom of the page,
 25 the bottom of page 1, do you see that there is an email

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1 there from George Lee of the BBA, sent on Christmas Eve
 2 2008 to Gareth Mills and someone else at the BBA?
 3 A. Yes, I can.
 4 Q. Then just so that it's clear and I'm setting it in
 5 context, if you go back up to the top of page 1 —
 6 I should have said this — the entire chain is in fact
 7 forwarded to you by Philip Heath. Do you see that?
 8 A. Yes, I do.
 9 Q. All right. So, with apologies, back down to the bottom
 10 of page 1, please.
 11 So this is just a couple of months after the first
 12 BBA certificate for K15 has been issued, because that
 13 was 27 October 2008; yes?
 14 A. Yes.
 15 Q. Here we are in December 2008.
 16 A. Yes.
 17 Q. In his opening paragraph, Mr Lee says this:
 18 "Hi Gareth,
 19 "We have recently received a number of comments on
 20 the K15 certificate in relation to the clarity of
 21 wording used as part of this certificate's fire
 22 section."
 23 Do you see that?
 24 A. Yes, I do.
 25 Q. He then goes on to make some proposals, some proposed

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1 amendments, in relation to improving the clarity of the
 2 wording.
 3 If you could look, please, at his second bullet
 4 point, "Key factors assessed" — do you see that?
 5 A. Yes, I do, yes.
 6 Q. That's the section we've just looked at on page 1 of the
 7 BBA certificate, which you said was not the best
 8 wording, about the boards not contributing to the
 9 development stages of a fire; do you remember that?
 10 A. Yes.
 11 Q. Do you see that here, at his second bullet point, what
 12 Mr Lee is suggesting is an additional sentence:
 13 "The product has been tested to BS 8414—1 for
 14 a specific construction on masonry walls."
 15 So that's the new proposal he is making to add into
 16 the certificate; all right?
 17 A. Okay.
 18 Q. Do you remember reading this email, George Lee's email,
 19 at the time?
 20 A. No, and I'm wondering why I'm even copied on the email
 21 because I had no involvement with George Lee at BBA.
 22 Q. I see. All right.
 23 Let's go up, please, to Mr Heath's response.
 24 A. Okay.
 25 Q. So if we just go up to the next email, thank you.

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1 Mr Heath doesn't appear to respond until
 2 5 March 2009, and just taking it quickly, essentially he
 3 says there:
 4 "Gareth Mills has brought to my attention ..."
 5 He registers some concern there in the third line
 6 about amendments being proposed so soon after issue; do
 7 you see that?
 8 A. Yes, I do.
 9 Q. Then he essentially goes on to say, "your request is
 10 receiving our attention".
 11 A. Yes.
 12 Q. Now, that email was sent to George Lee at 14.47, and if
 13 you look up, please, to the top email in the chain, do
 14 you see that two minutes later, at 2.49, Philip Heath
 15 emails to you, Mr Meredith and Mr Mills the instruction,
 16 "Let the file gather dust guys"?
 17 A. Yes, I can.
 18 Q. Can you remember receiving that instruction from
 19 Philip Heath?
 20 A. No.
 21 Q. It's quite an unusual instruction, would you agree?
 22 A. It is. I don't recall the email. Again, it's
 23 interesting how I have been brought into the loop again
 24 on these emails. I mean, you raised it earlier about
 25 you're trying to understand my role at Kingspan, and

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1 it's interesting. Again, it's a clear example of — if
 2 you look at the names in the "To" list, you have
 3 Ivor Meredith and Gareth Mills.
 4 Q. Yes.
 5 A. It's obviously come out of the Inquiry that these two
 6 individuals — which we won't go into now, but obviously
 7 as a department head at the time, I was obviously always
 8 available in the office. I sometimes wonder if I was
 9 just sent these emails because I was a department head
 10 that reported in to Philip Heath as to say, "Oh, Andrew,
 11 just in case these other two are not around, here's
 12 an email". But why I keep getting copied in on these
 13 emails when I never had involvement with the BBA or the
 14 wording I do not know, other than that.
 15 Q. The upshot of it is you don't remember receiving it or
 16 reading it?
 17 A. Correct.
 18 Q. I mean, this is an email, again, it isn't copied to —
 19 A. No, I agree.
 20 Q. — lots of mailing lists and hundreds of people; it is
 21 to you, Mr Meredith and Mr Mills again. Did you
 22 think —
 23 A. Yes.
 24 Q. I've asked you this already, but this is 2009 now. Did
 25 you think of saying to Philip Heath, "You have

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1 misunderstood my role, I do not have anything to do with
 2 the BBA, please would you stop sending me emails about
 3 it"?
 4 A. Yeah, I mean, at the time, 2009, I was getting involved
 5 in emerging markets, so at the time I was transitioning
 6 to other roles. I was receiving so many emails.
 7 I mean, whether I said to Philip at the time, I cannot
 8 recall, but looking at the emails you have pulled up
 9 today, it is quite clear that I'm being brought in on
 10 these emails as a to or a cc —
 11 Q. Yes.
 12 A. — with hardly any background on the enquiry.
 13 I mean, I had heard of this chap called George Lee
 14 at BBA.
 15 Q. Yes.
 16 A. I'd never met the guy or had any involvement with him,
 17 but again, my name's been put on an email and it's
 18 brought me into this chain of events. But I know at the
 19 time in 2009 I was transitioning into emerging markets,
 20 I was travelling a fair bit, so a lot of the time —
 21 when you're receiving the number of emails I did on
 22 a daily basis, a lot of the time — and as I said
 23 earlier in the Inquiry, K15 was not a big product for
 24 me, I'm afraid. I had many other products in my
 25 portfolio that I actually had my remit to deal with, and

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1 a lot of the time my workload was in other areas of the
 2 business, so ...
 3 Q. Yes.
 4 A. I can only apologise for not being able to provide any
 5 more information behind —
 6 Q. No, that's fine.
 7 I want to ask you, a few moments ago, when we were
 8 talking about the individuals who are in the "To" list
 9 from the email we just looked at, and in fact those two
 10 individuals appear in a lot of emails that you say you
 11 were wrongly copied in to or they were nothing to do
 12 with you, I don't know if I interrupted you or perhaps
 13 you moved on, but you said, "It's obviously come out of
 14 the Inquiry that these two individuals — which we won't
 15 go into now", what was it that you wanted to say,
 16 Mr Pack, about those two individuals?
 17 A. I think it's a case of their work ethic, their
 18 availability during the working day, was it in question
 19 at the time? Obviously it's come out in the Inquiry now
 20 that, yes, it is. I mean, there was obviously a lot of
 21 talk at the time about these individuals, where their
 22 presence was, what were they up to. I can only think
 23 that I was copied on these emails because I was in the
 24 office 9.00 until 7.00.
 25 Q. I see.

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1 A. And it was a means of — at least the person sending the
 2 email would know that it went to somebody that might
 3 pick it up. But the fact that I was actually not
 4 dealing with that type of work with the BBA, I can't
 5 understand why I would be copied in.
 6 Q. All right. Thank you.
 7 Just thinking more basically about the words that
 8 Philip Heath used in that, "Let the file gather dust
 9 guys", do you agree that that is a clear instruction to
 10 delay the matter of the proposed amendments?
 11 A. Yes.
 12 Q. One of the projects that you did pick up obviously was
 13 the LABC certificate, and I want to go back to that now,
 14 please, and in particular David Jones' understanding
 15 of limited combustibility, because that is an important
 16 part of that certificate.
 17 So if we can go, please, back to David Jones'
 18 witness statement, {HBC00000029/37}. It's the second
 19 sentence of the last paragraph at the bottom of that
 20 page, and we'll just read it all. He is asked about
 21 whether or not he was told that K15 was a material of
 22 limited combustibility, and his answer is this:
 23 "If this happened it would have been in my initial
 24 meeting with Kingspan at the strut of the Herefordshire
 25 Council assessment. However I cannot from memory recall

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1 exact wording, or who said what, and so on that basis it
 2 would be wrong of me to say that anybody used the
 3 specific phrase 'limited combustibility.' I can say with
 4 some certainty however that I left that meeting with the
 5 clear impression that this is what K15 was."
 6 He goes on to say that he recalls that that was
 7 consistent with a general opinion among building control
 8 surveyors.
 9 Seeing that — and, actually, I need to ask you:
 10 have you seen this witness statement previously,
 11 David Jones' witness statement?
 12 A. Briefly saw it, yes. A number of months ago, it was
 13 circulated.
 14 Q. Fine.
 15 A. But I absolutely disagree with the comment that he left
 16 that meeting under the understanding that our product
 17 was limited combustibility.
 18 Q. I'm not sure you can disagree with his recollection that
 19 he left the meeting with that impression; I think what
 20 you're trying to say is that you didn't give that
 21 impression, are you?
 22 A. Absolutely.
 23 Q. Did either you or Mr Heath say that K15 was a material
 24 of limited combustibility?
 25 A. I can only comment on myself, and I did not say the

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1 product was limited combustibility or infer that it was
 2 of limited combustibility.
 3 Q. You didn't say it or infer it?
 4 A. Yes.
 5 Q. Why can you only comment on yourself? Do you —
 6 A. Because I cannot —
 7 Q. Sorry?
 8 A. I simply cannot recall what was actually said in that
 9 meeting in 2008.
 10 Q. Fine.
 11 Talking for yourself, then, did you tell David Jones
 12 that K15 could be considered to be a material of limited
 13 combustibility?
 14 A. No.
 15 Q. Did you tell David Jones at that meeting or at any other
 16 time that the system tested in May 2005 was
 17 a masonry-backed system, not a steel-framed system?
 18 A. Yes, it would have been based upon a masonry background,
 19 yes.
 20 Q. You told him that?
 21 A. Yes. However, the literature we had, I believe, showed
 22 masonry and steel frame with a non-combustible backing
 23 and I believe it was from that that the LABC was wrote.
 24 Q. Well, did you discuss with David Jones the consensus you
 25 described to us earlier that you understood to have been

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1 reached, which was that — and you must tell me if
 2 I have this wrong from you — there was no need to test
 3 to 8414-2, you could just put in a non-combustible liner
 4 and have tested to 8414-1? Did you discuss that
 5 consensus with him?
 6 A. I cannot recall.
 7 Q. Do you recall whether or not Philip Heath mentioned to
 8 David Jones that, after Kingspan's one successful test
 9 to 8414 in May 2005, the product underwent a significant
 10 change in September 2006?
 11 A. I did not know that myself, and I do not recall that
 12 being said in the meeting.
 13 Q. Right. I want to ask this: was your objective, in going
 14 into the meeting, to obtain as broad and as wide
 15 an approval for K15 from the LABC as you could?
 16 A. I would say we were looking to their advice as to how we
 17 could take this product forward —
 18 Q. Yes.
 19 A. — to give us whatever scope we could for using this
 20 product behind rainscreen claddings at the time, and
 21 that obviously, during the discussion, would have
 22 covered below and above 18 metres.
 23 Q. Yes, all right.
 24 Can we look, please, at another of the new documents
 25 which has come to us, and this is at {KIN00024989}. If

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1 we can look, please, halfway down the page to
 2 David Jones' email to you, on 26 January 2009. Do you
 3 have it?
 4 A. Yes.
 5 Q. I think this is an email that obviously came to you
 6 after your meeting in December.
 7 A. Yes.
 8 Q. And he says there:
 9 "Apologies for being a while getting back to you ...
 10 [all] been a bit hectic ..."
 11 I will read the second paragraph with you and I want
 12 to ask about that:
 13 "I have now done the research necessary and come up
 14 with what I think will be a [usable] certificate for
 15 acceptance by LABC across the UK. What I have tried to
 16 do as we discussed is to get away from just assessing
 17 K15 as a product in isolation and extend the certificate
 18 to represent a system approval for the whole external
 19 wall arrangement. Of course, with the other components
 20 being undefined, and with various options available this
 21 does present some problems as we established when we
 22 met. What I have done though is to refer to the three
 23 standard details contained within the Kingspan
 24 literature (unless you have any other standard detail
 25 drawings that you think may be more appropriate?) and

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1 instead of applying a manufacturers reference top the
 2 undefined elements I have specified a generic standard
 3 for each (using British Standard references). The
 4 conclusion being that K15 can be accepted in all
 5 locations provided the other parts of the wall
 6 construction meet the standards stated and reflect the
 7 Kingspan standard details. Inevitably most mainstream
 8 products will have been manufactured to the appropriate
 9 British Standard and so the 'system' in each case should
 10 be fairly easy to pin down, and the contribution of K15
 11 to the relevant parts of the regulations obvious."
 12 Then he goes on to ask for payment.
 13 I'm going to ask for your help with that larger
 14 paragraph.
 15 First of all, is that what you were talking about
 16 earlier: you had discussed with him extending the
 17 certificate to make it into a system approval even
 18 though it was in fact for a product?
 19 A. No, that wasn't — it wasn't Kingspan that came up with
 20 that idea. We talked to him about — we talked to
 21 Herefordshire Council about the product. He went away,
 22 discussed with LABC, and came back, and his conclusion
 23 was that we should treat it as a system approval.
 24 Q. Well, no, but hang on, what he says here is, if you look
 25 at the second line of that larger paragraph:

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1 "What I have tried to do as we discussed is to get
2 away from just assessing K15 as a product ..."
3 A. Yes.
4 Q. So that must have been discussed at the meeting. He
5 didn't come away from the meeting, come up with the idea
6 that he would extend the certificate into a system
7 approval and then announce it to you here; he is saying
8 to you here, isn't he, "We discussed that idea at the
9 meeting and here's how I'm going to go about it"? Do
10 you see?
11 A. That's what I'm saying. So at the meeting we discussed
12 just the product in isolation.
13 Q. Yes.
14 A. He then went away and said, "Actually, I've now
15 discussed it and I have another solution, which is to
16 treat it as a system approval". So, yes, I agree --
17 Q. Do you accept --
18 A. So in the meeting we had, we were looking at the
19 product. It was just the product in isolation, on its
20 own, just like we did with the tapered insulation. It
21 was talking about the insulation. Obviously he has now
22 gone away and said, "Actually, I've now come up with
23 a proposal, and the proposal is that we look at it as
24 a system approval".
25 Q. But it doesn't say that. Forgive me, it may be that I'm

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1 confused. I think you're trying to say that you went
2 into the meeting and your only idea was that K15 had to
3 be assessed as a standalone product.
4 A. Yes.
5 Q. And that, quite separately, David Jones went away and,
6 all by himself or with whoever he discussed it with, he
7 came up with the idea of extending it to make it into
8 a system approval, and then announce that to you in this
9 email -- and, sorry, we do need that back up, please,
10 {KIN00024989}.
11 A. That's the way I see it.
12 Q. That's the way you see it?
13 A. That's the way I understood it, yes.
14 Q. I'm going to have one last go at this: that's not what
15 it says, is it? If you look at the second line, it
16 says:
17 "What I have tried to do as we discussed is to get
18 away from just assessing K15 as a product in
19 isolation ..."
20 That does not say, "I've had an idea, let's not
21 assess it as a product in isolation, let's extend it to
22 a system". That's something you had already plainly
23 discussed with him.
24 A. Okay, well, I see the -- I see it as a system, not as
25 a product in isolation. I mean, when you read the

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1 certificate, it is very much a system approval.
2 Q. We will come to the certificate. I'm just trying to
3 concentrate on --
4 A. Sure.
5 Q. -- whose idea it was to extend it into a system
6 approval.
7 A. That would have been Herefordshire Council in
8 conjunction with LABC, not Kingspan.
9 Q. You're quite definite about that, despite the content of
10 this email; yes?
11 A. Yes, that was my understanding at the time. They came
12 with the idea of creating a system approval.
13 Q. All right. So this email, when it came to you on
14 26 January, was a complete surprise to you? It was the
15 first you had heard that you were going to a move away
16 from assessing a standalone product into extending it to
17 a system approval?
18 A. Yes, as far as I can recall, it was very much about the
19 product at the time, and then obviously this email's
20 come through to confirm we can -- we've now had
21 a discussion about it, to extend it to represent
22 a system approval rather than a product in isolation,
23 and that's of course -- when you read the certificate,
24 you can see that it's clearly written around non --
25 Q. We'll come to --

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1 A. -- insulation.
2 Q. -- the certificate. I'm sorry, I just ...
3 All right, so this came up -- well, could you help
4 me with this: there is a great deal that you can't
5 recall about what was said during your only meeting with
6 David Jones, but you're absolutely clear, are you, that
7 at no time did you and he or Philip Heath and he discuss
8 the idea at the meeting of extending the certificate
9 into a system approval; this is the first you heard of
10 it, on 26 January?
11 A. To my recollection, yes.
12 Q. Can you just go down, please, to the fourth line at the
13 start of the sentence which reads "Of course", and then
14 we're going to move on. He says there:
15 "Of course, with the other components being
16 undefined, and with various options available ..."
17 He means the other components of the external wall
18 arrangement; yes?
19 A. Yes.
20 Q. "... and with various options available this does
21 present some problems as we established when we met."
22 Now, clearly he is talking about a discussion you
23 had about that during your meeting, isn't he?
24 A. I cannot recall what that is in relation to.
25 Q. Well, what else could it be in relation to?

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1 A. We could well have spoken about something, but I cannot
 2 recall. My understanding was that we were discussing it
 3 about the product in isolation, and then it was only
 4 when they'd obviously gone away and done their due
 5 diligence that they realised that actually they could
 6 pull it into a system. I cannot recall what we actually
 7 said in the meeting in terms of system approval, product
 8 isolation, but my understanding was that we were solely
 9 looking at the insulation.

10 Q. You can't recall what was said at the meeting other than
 11 that, you took no part in extending the certificate to
 12 cover the whole external wall arrangement?

13 A. No, I didn't take the decision to extend it to cover the
 14 whole wall arrangement.

15 Q. No. All right.

16 I'm so sorry, we're going to go back to that email
 17 again, please, and move on within it. It's
 18 {KIN00024989}.

19 I want to look, please, in particular at the fifth
 20 line up from the bottom of the second paragraph:
 21 "The conclusion being that K15 ..."
 22 Do you have that?

23 A. Yes.

24 Q. "The conclusion being that K15 can be accepted in all
 25 locations provided the other parts of the wall

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1 construction meet the standards stated ..."

2 And so on.

3 That is not accurate in relation to external wall
 4 constructions for buildings over 18 metres, is it?

5 A. You would have to ask Herefordshire Council as to what
 6 they are actually referring to there.

7 Q. Well, I'm asking you. What he says is:
 8 "The conclusion being that K15 can be accepted in
 9 all locations provided the other parts of the wall
 10 construction meet the standards stated and reflect the
 11 Kingspan standard details."

12 A. Okay.

13 Q. So what he is saying is that as long as all the other
 14 component products in an external wall arrangement meet
 15 various British Standards and your marketing
 16 literature's design details, K15 can be accepted in all
 17 locations. That is what that sentence plainly means,
 18 isn't it?

19 A. Yes. But if you look at the — what we were — the
 20 actual system approval here, it didn't just cover
 21 buildings above 18 metres.

22 Q. No.

23 A. You can take that wording that that was referring to
 24 below 18 metres. If you look at the actual system
 25 approval, it was covering below and above 18 metres.

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1 Q. It was.

2 A. And it also stated in there that you had to refer to the
 3 wall construction meeting particular standards, so yes,
 4 I agree with that, and then also it did have footnotes
 5 in the actual standard — sorry, in the approval, that
 6 said that the back, substrate and the cladding had to be
 7 of limited combustibility. So you can't just take this
 8 sentence and look at it on its — in isolation on its
 9 own.

10 Q. Well, I am looking at it on its own, Mr Pack, because
 11 yes, I'm aware that the certificate — and we will come
 12 to it — contains various caveats, and I'm aware that it
 13 applied to the use of K15 both above and below
 14 18 metres, but I'm asking you about this particular
 15 sentence, "The conclusion being that K15 can be accepted
 16 in all locations provided [the following two things
 17 occur]". It doesn't say "in all locations below
 18 18 metres". All I'm asking is whether you are prepared
 19 to agree with me that that sentence is not accurate in
 20 relation to buildings over 18 metres?

21 A. Correct, I agree.

22 Q. Thank you.

23 Did you think of correcting David Jones about that?

24 A. This obviously is an email, so we haven't got all of the
 25 rest of what went on from this email.

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1 Q. No, we have, we will come to that.

2 A. Okay.

3 Q. But I can tell you that you didn't go back and correct
 4 him.

5 A. Okay. But I —

6 Q. I mean —

7 A. I think that the — even though I agree that that
 8 wording that he put in this paragraph is not correct,
 9 I believe that what came off the back of this in terms
 10 of the document clearly covered a lot of what you have
 11 been asking me in regards to this paragraph and clears
 12 up a lot of that.

13 Q. Let's have a look at the email above this one, please,
 14 if we can move up the page. We can see that you
 15 actually send it on to Philip Heath the next day, on
 16 30 January 2009. Do you see that?

17 A. Yes.

18 Q. What you in fact say to Mr Heath is this:
 19 "Phil,
 20 "We have had the following come back from LABC, I
 21 think this looks ok, what do you think. I am thinking
 22 of sending him the above renders though just to
 23 highlight the approval will need to cover not only
 24 behind terracotta rainscreen as per the three standard
 25 details contained within our literature which he refers

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1 to (which obviously is fine), but also for metal/zinc
 2 cassettes and ceramic granites [rainscreens]. As the
 3 latter 2 types of [rainscreen] are popular too.”
 4 Do you see that?
 5 A. Yes.
 6 Q. So you did read it at the time, and you did understand
 7 it at the time.
 8 A. Okay. So I guess what I’m now saying is that I feel
 9 this looks okay. I’m now obviously mentioning, “Let’s
 10 look at other metal/zinc cassettes, granites,
 11 et cetera”, but I think what we’re missing here is that
 12 the document wasn’t just for buildings above 18. It was
 13 for —
 14 Q. I understand that.
 15 A. — as well, so ...
 16 Q. I understand that, but what you absolutely do not do is
 17 go back to Mr Jones and say, “Hang on, all this is
 18 correct, but we must make the distinction, this is not
 19 correct or accurate above 18 metres, for buildings above
 20 18 metres”. You don’t do that, do you?
 21 A. But we do in the final — I can’t remember if we
 22 actually spoke about it, but I know in the final
 23 document that was produced, it does clearly cover
 24 non-combustible cladding. So where I’ve asked, “Can we
 25 also include metal/zinc cassettes”, we obviously must

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1 have discussed this because, no, that didn’t get into
 2 the actual approval.
 3 Q. No.
 4 A. Clearly — sorry.
 5 Q. — above renders that you are referring to at the second
 6 line of your email, is there an attachment that I can’t
 7 see, “sending him the above renders”?
 8 A. Yeah, so I’m guessing that will have come out of our
 9 standard product literature.
 10 Q. Right.
 11 A. Because —
 12 Q. So that would be the — sorry. Would that be the design
 13 drawings from within the product literature?
 14 A. Yes.
 15 Q. Fine.
 16 A. I think because — that’s the thing with emails, you
 17 can’t always see what other discussions are going on.
 18 I mean, it sounds to me, reading through this email
 19 trail, that David has gone away, has come back with
 20 an idea that we could do this to a system approval, and
 21 obviously as we see in that email. I’ve then obviously
 22 forwarded it to my line manager, who’s obviously — or
 23 I’ve said, “I think this looks okay, what do you think?”
 24 I’m also thinking: could we extend this to other
 25 cladding types? I know that that was another chain of

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1 events that happened, and I know that that didn’t get
 2 covered in the document.
 3 But the final document, it clearly did cover the
 4 fact that you had to have a substrate and a cladding of
 5 the limited combustibility. So it did answer a lot of
 6 the questions down below where it was a little bit
 7 ambiguous.
 8 Q. Yes. We are going to come on to that. I realise I keep
 9 saying it, but I do just want you to try — I know it’s
 10 difficult — just to concentrate on these emails. There
 11 are no others that have been provided to us.
 12 It is quite clear, I’m going to suggest to you, that
 13 what you’re trying to do, and you’re running it past
 14 Philip Heath first, is to extend the certificate even
 15 further to include other kinds of popular rainscreen
 16 cladding materials.
 17 A. Correct, yes, because most of the enquiries the team
 18 used to get were below 18 metres, so —
 19 Q. All right.
 20 A. — buildings that do have — and as I keep referring,
 21 this was not just above 18 metres, this document.
 22 Q. I’m aware of that. Thank you.
 23 Philip Heath’s response to you on the same day at
 24 the top of this email chain is simply, “Hi, worth
 25 a try”. I’m going to suggest to you that he used that

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1 wording because that’s what you were doing, wasn’t it:
 2 trying your luck to see how far and how wide you could
 3 get the LABC’s scope of approval?
 4 A. I would disagree with that. I mean, the LABC, or in
 5 this case Herefordshire Council, who we were dealing
 6 through, they had a system in place, and we’re only
 7 following the system that they had.
 8 I can only go by what I understand. This system had
 9 been in place. We were following the route to market.
 10 We had a meeting. We did — they did their due
 11 diligence. We’re only following what was given to us
 12 through this course of proceedings. I mean, we looked
 13 to the LABC and Herefordshire Council to assist us with
 14 this.
 15 Q. Yes, I understand that, and I understand that you say
 16 that there was a system in place and that they did their
 17 own checks or due diligence. But this email in which
 18 you’re running past your own line manager the idea of
 19 extending the scope of the certificate even further —
 20 A. Yes.
 21 Q. — is no part of that system, and, further, it’s
 22 certainly not an admin role, is it, what you’re doing
 23 there? You’re right into the substantive detail of what
 24 is going to go into the certificate.
 25 A. Correct. I’m actually asking the question. I mean,

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1 I still classed it as an admin role, what I was involved
 2 with, this procedure, and I'm simply asking the question
 3 because I know for a fact that there was cladding types
 4 like the ones I listed that we wanted to be able to
 5 cover our insulation below 18 metres.
 6 Q. Only below 18 metres?
 7 A. That's for LABC to determine whether it can go above
 8 18 metres. I was simply asking — you have to remember
 9 this document was to cover rainscreen cladding, lower
 10 than 18, above 18, it was for rainscreen cladding. It
 11 was up to LABC and Herefordshire Council to do the due
 12 diligence to determine which cladding types can be used
 13 above and below, and subsequently —
 14 Q. Do you think it might have been an idea to make clear
 15 David Jones so as not to mislead him which were
 16 appropriate for use with K15 over 18 metres and which
 17 were not?
 18 A. I cannot recall what was discussed in the meeting in
 19 terms of that particular question.
 20 Q. All right. But the reason you gave to Mr Heath in
 21 making that suggestion and running it past him is that
 22 those were popular rainscreens; yes?
 23 A. Yes.
 24 Q. K15, just so we are completely clear, had never been
 25 incorporated into a system tested to BS 8414 meeting the

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1 criteria in BR 135 with any kind of metal cladding, had
 2 it?
 3 A. No, correct, it was only non-combustible cladding or
 4 limited combustibility.
 5 Q. Including zinc, it had never been tested with zinc outer
 6 cladding?
 7 A. No.
 8 Q. Or terracotta?
 9 A. All I knew was it was a non-combustible cladding, so it
 10 was whether the terracotta gets pulled into that
 11 non-combustible cladding.
 12 Q. As far as you were aware, had K15 ever been tested in
 13 a system to 8414 with terracotta cladding?
 14 A. All I knew that there was a fire test done, but I'm not
 15 100% sure it was terracotta. It was a non-combustible
 16 cladding.
 17 MS TROUP: All right.
 18 I'm going to pause there for a moment, Mr Pack, and
 19 just ask the Chairman whether this might be
 20 an appropriate time for a pause. I've come to
 21 a slightly natural break.
 22 SIR MARTIN MOORE-BICK: Thank you very much. Well, this is
 23 a good time if it's suitable as far as you're concerned.
 24 MS TROUP: Yes.
 25 SIR MARTIN MOORE-BICK: All right, good.

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1 Well, we'll have a break now, Mr Pack. We will come
 2 back at 3.30 — that's 3.30 our time, of course — and
 3 please remember not to speak to anyone about your
 4 evidence or anything relating to it while you're out of
 5 the room. All right?
 6 THE WITNESS: Thank you.
 7 SIR MARTIN MOORE-BICK: Good, thank you very much.
 8 3.30, then, please.
 9 (3.15 pm)
 10 (A short break)
 11 (3.30 pm)
 12 SIR MARTIN MOORE-BICK: Hello, Mr Pack, we're back with you,
 13 at least I hope we are. Can you see and hear me?
 14 THE WITNESS: Yes, good afternoon. Yes, I can.
 15 SIR MARTIN MOORE-BICK: Thank you very much. Are you ready
 16 to carry on?
 17 THE WITNESS: Yes, I am, thank you.
 18 SIR MARTIN MOORE-BICK: Thank you very much.
 19 Ms Troup, if you're ready, off you go.
 20 MS TROUP: Thank you.
 21 Mr Pack, I am going to ask you to look at the next
 22 of the new emails that have been provided to us quite
 23 recently, and it's in fact your response to David Jones'
 24 email of 26 January. So can we go, please, to
 25 {KIN00024996}.

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1 If you look halfway down the page, you can see the
 2 same email from Mr Jones that we've just been looking at
 3 sent on 26 January; yes?
 4 A. Yes.
 5 Q. Then if we go up, please, to your email, which is dated
 6 18 February, that's your response, and you say this:
 7 "Dear David
 8 "Thank you for the update on the application ..."
 9 Then in your second paragraph you say you're sending
 10 a cheque.
 11 In your third paragraph, you say this:
 12 "Finally just picking up on your point below,
 13 referring to the three standard details contained within
 14 the Kingspan Kooltherm K15 literature is acceptable.
 15 Just one small point although we show terracotta clay
 16 tile panels there are many other generic claddings types
 17 all of which are commonly used and these include:—
 18 Zinc/Aluminium/Stainless Steel/Ceramic Granite and High
 19 Pressure Laminate, which I'm thinking will be covered by
 20 the idea of having this generic standard for each using
 21 British Standard references."
 22 A. Yes, correct.
 23 Q. Yes?
 24 So there, after your email running your idea of
 25 extending into additional cladding types past Mr Heath,

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1 you have actually added a few, haven't you, including
 2 high—pressure laminate?
 3 A. Yes.
 4 Q. I think in fact you have added aluminium, stainless
 5 steel; none of those had been tested with K15 to
 6 BS 8414, had they?
 7 A. This is in relation to below 18 metres. Don't forget,
 8 the stamp — this system approval that was now being
 9 talked about was not only covering above 18 metres. So
 10 these extra additional ones would have obviously been
 11 passed to me. I would have been asked to look at those
 12 specific types, as those are the typical types that the
 13 team would have been receiving. But you have to
 14 remember, this is not solely in relation to above
 15 18 metres, this is also for below 18.
 16 Then when the following correspondence after this
 17 kicks in, you will see that when we eventually do create
 18 this document, once it does go above 18, obviously these
 19 don't get covered.
 20 Q. All right.
 21 In any event, at this stage, neither he in his email
 22 to you of 26 January, or you in your email of
 23 18 February, say, "This is only in relation to use under
 24 18 metres", do you?
 25 A. Correct, not in the email.

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1 Q. No.
 2 All right. If we can go now, please, to
 3 {KIN00024997}, this is actually the signed application
 4 form which you attach to your email on 18 February.
 5 If you look at the bottom of that document, do you
 6 see that it's dated 18 February?
 7 A. Yes.
 8 Q. Is that your signature?
 9 A. Yes.
 10 Q. Is the handwriting in the body of the form yours?
 11 A. Yes.
 12 Q. If we look at section 4, please, "Description of
 13 System/House Type", what you have written is this:
 14 "Kingspan Kooltherm K15 rainscreen insulation board
 15 for use behind rainscreen cladding systems for buildings
 16 both less than and more than 18 metres in height."
 17 Yes?
 18 A. Correct, yes.
 19 Q. There is no indication there that the way in which K15
 20 can be used above 18 metres or below 18 metres is
 21 different, is there?
 22 A. No, because this is a — I mean, you're limited to what
 23 you can put in this form. This is simply a description
 24 of what we were looking at in terms of the subject
 25 matter. It wasn't going to any depth, other than to

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1 just explain that we wanted to look at K15 for behind
 2 rainscreen claddings for those buildings above and below
 3 18 metres.
 4 Q. Indeed, and where you went into more depth was in the
 5 emails we've just looked at; yes?
 6 A. Yes.
 7 Q. I want to take you back to your witness statement,
 8 please, so {KIN00008702/37}, paragraph 7.60. This is,
 9 I think, your summary of your role, which you have
 10 described now as an admin role:
 11 "My role was contacting the LABC for an initial
 12 meeting, attending that initial meeting, sending them
 13 the 2 documents they had requested and then receiving
 14 the certificate in 2009."
 15 Yes?
 16 A. Yes, at the time when I wrote this witness statement,
 17 correct.
 18 Q. So at the time when you wrote this witness statement you
 19 had forgotten about the correspondence we've just looked
 20 at?
 21 A. Yes.
 22 Q. And you had forgotten about your suggestions to include
 23 additional popular types of rainscreen cladding?
 24 A. Yes.
 25 Q. If we can look also, please, at paragraph 7.54 of your

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1 witness statement, which is on page 35 {KIN00008702/35},
 2 there you say:
 3 "The initial discussions involved us saying 'here
 4 are our documents' (which included the K15 marketing
 5 literature, and the BBA certificate) and off the back of
 6 that the LABC would issue a certificate which contained
 7 a number of conditions."
 8 We will come back to the end of that.
 9 It's not quite right, is it, that that's all you
 10 did? Having looked through the correspondence from the
 11 time, there was a bit more to it than that.
 12 A. Yes, I mean, when I wrote this witness statement, a lot
 13 of the emails which you have pulled up today were not
 14 available. Trying to record something back in 2008, in
 15 my mind I just remembered it being a very simplified
 16 process. If I was to draw a diagram of how it went
 17 forward, I remember having a meeting, I then remember
 18 presenting two documents, I remember then a break for
 19 the end of the year, we came back in the New Year,
 20 Herefordshire Council and LABC had obviously discussed
 21 the route forward —
 22 Q. Yes.
 23 A. — and obviously today we have seen there are a couple
 24 of emails which obviously we've highlighted today. But
 25 following that, yeah, I think the procedure — I mean,

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1 obviously I was a stand-in to do this. It was not my
 2 remit to be a project manager on certification. I was
 3 obviously called in to do this, as we mentioned earlier.
 4 To me, I didn't know anything different, but it just
 5 felt very much like an admin role.
 6 Q. Did it feel like an admin role when you were making
 7 suggestions to David Jones in the emails we've seen as
 8 to the technical content and what should be included?
 9 Never mind what went into the end certificate for now.
 10 Did that feel to you like an admin role, making
 11 suggestions as to the actual technical content of the
 12 certificate?
 13 A. Well, those were passed to me, as I said earlier, by
 14 a colleague. So they would have said, "Look, can we
 15 look to maybe look at these types of cladding as part of
 16 this approval?"
 17 Q. Which colleague?
 18 A. Colleagues in the department.
 19 Q. Was that by email?
 20 A. No, I mean, like, for example, we all knew within the
 21 team, like, the different types of cladding that you
 22 have on buildings above and below 18 metres, so all
 23 I can think of is that generally when you're in a team
 24 and you're working on enquiries, people get to know
 25 about the types of cladding that are being used, and

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1 I can only think that personnel would have said,
 2 "Andrew, can you look to maybe include these on this
 3 approval". And as you have seen, there was an extra two
 4 added on, so obviously again somebody has come to me and
 5 said, "What about adding these?"
 6 Q. It's not obvious, is it, because — I mean, you have
 7 just told us that. But all right, so that's your
 8 evidence, that you made those suggestions because, and
 9 you can only think that it's because, someone else told
 10 you to do so, I think that's your evidence.
 11 A. Yes. I mean, at the time we were obviously looking for
 12 this document to be able to cover many different
 13 cladding types, and those would have been the typical
 14 ones that the team would have been receiving on a daily
 15 basis.
 16 Q. Yes, and it's right, isn't it, that you were looking for
 17 the certificate to include a number of popular
 18 rainscreen cladding types because that would be of
 19 benefit to Kingspan in terms of the sales of K15?
 20 A. Yes, but at the same time making sure that LABC and
 21 Herefordshire Council do their due diligence and make
 22 sure that the certificate covered appropriately the use
 23 of those claddings above and below 18 metres.
 24 Q. All right. Can we go now, please, to another of the new
 25 documents, {KIN00024990}. If we go to the second email

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1 down on 27 February 2009, this is David Jones to you.
 2 Do you see that?
 3 A. Yes.
 4 Q. Have you seen this email now?
 5 A. Yes.
 6 Q. He says in the opening paragraph:
 7 "I've now had the formal registration through from
 8 LABC so would just like to run the attached past you
 9 before I send it off to them."
 10 And then he goes on.
 11 The draft of his type approval summary is actually
 12 attached to this email; do you accept that?
 13 A. Yes.
 14 Q. Do you remember receiving the draft?
 15 A. I actually don't remember this email until I — in fact,
 16 when I did my witness statement I didn't remember this
 17 email, but I have seen this email in the last number of
 18 months. I don't recall this email coming to me, but
 19 it's obviously come to me on 27 February.
 20 Q. Yes.
 21 A. And it does state that "My summary of findings (as
 22 attached)", so I'm assuming there must have been
 23 something attached to this email.
 24 Q. There was, we will come to that.
 25 Can you just help me with something that you just

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1 said. When did you first see this email?
 2 A. I think it was during the — it was definitely after my
 3 witness statement.
 4 Q. Yes. Well, that's 19 September 2019.
 5 A. Yeah, so it was when all the emails were starting to be
 6 found on the system.
 7 Q. When was that, do you know?
 8 A. Well, I tend to get emails every — whenever they find
 9 emails on the system, they will highlight them to me.
 10 Q. I see, all right.
 11 Can we go back to that email, please, {KIN00024990}.
 12 In the third paragraph there, David Jones says:
 13 "I think I've covered your last comments with regard
 14 to the standard details — although the type approval
 15 refers to the three design details this is just to
 16 establish the overall form of construction to be
 17 employed. The choice of inner substrate and rainscreen
 18 cladding system are left open to choice, subject to each
 19 of them meeting the standards listed further down."
 20 Do you see that?
 21 A. Yes.
 22 Q. I appreciate you have said you don't remember receiving
 23 it, but he is essentially just repeating there what he
 24 said to you in his email of 26 January, isn't he?
 25 A. Yes.

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1 Q. It's obvious from that paragraph that David Jones had
 2 taken your comments into account, isn't it?
 3 A. Yes, and it's clear that he has decided not to run with
 4 my comments.
 5 Q. Well, or he has decided that the summary as it is
 6 already deals with and covers the comments you have
 7 made; yes?
 8 A. Yes. I think it must have got too complicated in the
 9 end that they've obviously decided to — they obviously
 10 took on board what we were trying to say about the fact
 11 that the team wanted other claddings to be considered.
 12 The reason this paragraph and how the eventual document
 13 came out, it looks to be as if they decided not to run
 14 with those cladding types, and clearly I know that the
 15 actual system approval in the end only covered
 16 non-combustible cladding in the end.
 17 Q. Right.
 18 Going up to the top email in this chain, please, do
 19 you see that you respond to David Jones on 2 March:
 20 "Thank you ...
 21 "We are happy with the content and for you to
 22 proceed with formal issue."
 23 A. Yes.
 24 Q. Yes?
 25 A. Yes.

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1 Q. You did not propose any changes to the type approval
 2 summary draft that he attached to his email, did you?
 3 A. I cannot recall.
 4 Q. All right. Well, we certainly haven't found any
 5 evidence of that.
 6 I want to show you a different email. This is
 7 {KIN00024991}. This is before you go back to
 8 David Jones to say that you are content for him to issue
 9 the certificate.
 10 Do you see that at the bottom of page 1, there is
 11 the 27 February 2009 email from Mr Jones to you
 12 attaching the draft?
 13 A. Yes.
 14 Q. If we go up, please, you forward it, do you see that, at
 15 11.35, to Philip Heath?
 16 A. Yes.
 17 Q. There is no message, just that you forwarded —
 18 A. Yes, because that was my role, was, you know ...
 19 Q. Sorry?
 20 A. That was my role, to feed it back to the technical
 21 manager.
 22 Q. All right.
 23 His response to you comes on 1 March 2009, and he
 24 says:
 25 "Hi Andy, well done, make no mistake this document

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1 could be GOLD, not just for K15 but potentially the
 2 Kooltherm range. Please progress this ASAP to the next
 3 stage. Once we get a final draft sorted we can then
 4 circulate to a select few. Peddle to the floor
 5 "Regards
 6 "Phil."
 7 It seems, would you agree, that there was some
 8 urgency to obtaining this from that email?
 9 A. Yeah, I cannot comment on what Philip Heath was
 10 insinuating there. "Peddle to the floor", you would
 11 have to ask Philip what the background to this text was.
 12 Q. Well, we didn't have this email, unfortunately, when he
 13 came to give his evidence. What I'm asking you is,
 14 first of all, do you remember receiving it? Do you
 15 remember him congratulating you in this way?
 16 A. I don't remember the email, but I do remember him saying
 17 congratulations on getting the LABC approval, but I'm
 18 not sure if it was around this date. I think it was
 19 more later on, I believe.
 20 Q. Do you remember this email or not?
 21 A. I — no.
 22 Q. All right. What do you —
 23 A. Not from recollection, anyway.
 24 Q. Fine.
 25 Looking at it now, what do you think he might have

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1 meant by saying that "this document could be GOLD", in
 2 capital letters?
 3 A. I do not know what he was meaning by gold.
 4 Q. Well, we can presume, I think, that he means that it's
 5 valuable, that it's something that's very beneficial to
 6 Kingspan. Are you saying that you were unaware that
 7 that's how it was received?
 8 A. Yes.
 9 Q. You were unaware of that?
 10 A. Yes.
 11 Q. All right. So you don't know what might have led
 12 Philip Heath to congratulate you on obtaining it?
 13 A. No, because actually it hasn't been ... because this is
 14 1 March. I don't think we actually got the
 15 certificate —
 16 Q. 1 March. So he has just seen from you that the draft
 17 has come through.
 18 A. But that's — what you just said then, I disagree with
 19 that, because this is still a draft, so it's not the
 20 final document. So I do not know what Philip meant by
 21 gold, and, yeah, I can't comment on that.
 22 Q. Can we just go back to your witness statement briefly,
 23 please, at page 38 {KIN00008702/38}. If we look,
 24 please, at paragraph 7.65, I'll just read it with you:
 25 "We had provided the LABC with the documents they

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1 had requested and they had drafted the certificate based
2 on those documents. We relied on their approval and due
3 diligence process and so had no reason to be concerned
4 about the wording or content. As far as I can recall,
5 we were not provided with a draft copy of the
6 certificate which we were offered the opportunity to
7 comment upon or review and so I consider that LABC were
8 entirely responsible for the contents of the
9 certificate."

10 Mr Pack, I think you accept now, or you must do,
11 that a draft was sent to you, because we've just looked
12 at that email.

13 A. Correct, but that question was done prior to that email
14 which I just said I didn't remember. And also, the
15 question was: did LABC send me a draft? And no, they
16 didn't send me a draft from LABC.

17 Q. I see, but you received it from Hereford?

18 A. Yes. Now that we've seen the email, they sent us those
19 three or four bullet points listing those documents.

20 Q. Yes. All right.

21 Well, can we have that back up, please,
22 paragraph 7.65 of your witness statement. Thank you.
23 Do you see that you say that, "As far as I can recall,
24 we were not provided with a draft"?

25 A. That's what I recalled at the time when I wrote this

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1 statement, yes.

2 Q. I understand, and that's fine, and you say there:
3 "... and so I consider that LABC were entirely
4 responsible for the contents ..."

5 My question to you is this: having now seen that you
6 did receive a draft, do you consider that Kingspan bore
7 any responsibility for the content?

8 A. I guess in hindsight, when we come to look at the
9 document in a moment, there are some instances where
10 there was a responsibility from Kingspan to possibly be
11 more engaged in making sure the wording was more
12 accurate. However, we would look to LABC and
13 Herefordshire Council for their understanding and
14 responsible — as they were the third party doing this,
15 and when you do read the certificate, it does state on
16 there, and we'll go through that in a moment, that it
17 wasn't a clear sign-off of the use of this product on
18 projects across the UK, and there is a clear statement
19 on the actual certificate, and there is also clear
20 wording in the actual approval.

21 So, yes, I agree, we did have some responsibility in
22 making sure that wording was correct, but we relied upon
23 LABC and Herefordshire Council as they were the body
24 that we looked to, to help us with regards to this
25 approval.

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1 Q. Understood.

2 Can we go now, please, to {KIN000024993}. If we
3 scroll to the very end of the page, please, I think, and
4 in fact on to page 2 {KIN000024993/2}, we can see that
5 on 7 May you are sending the final formal confirmation
6 of the system approval certificate and other associated
7 documents to Philip Heath.

8 A. Yes, correct.

9 Q. Then there is a bit of admin, if we go up, please, to
10 the next email in the chain, Philip Heath asks you
11 whether the summary can be provided on headed paper.
12 Going up again, please {KIN000024993/1}, you say there
13 on 7 May at 11.53, "Yes David is working on that ..."

14 Then if we go up again, please, to your email to
15 Philip Heath at 14.29, all on the same day, you say,
16 "This looks better", and I think — you must tell me if
17 I'm wrong — that's because the summary on headed paper
18 has been received as Philip Heath requested.

19 A. Yes.

20 Q. Mr Heath's response, if we go to the top of the chain,
21 is: "FANBLOODYTASTIC".

22 A. Yes.

23 Q. Do you remember that?

24 A. I don't, but now you've shown me it, I can see that he's
25 obviously replied to me after I've said, "This looks

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1 better".

2 Q. Yes, and he is obviously pretty pleased, isn't he?

3 A. Yes.

4 Q. Do you say that you don't know why?

5 A. I'd guess because we're now into May 2005 and the system
6 approval certificate has been issued, he's obviously
7 very happy with that. He's obviously seen that we've
8 got an approval system on the tapered system and now we
9 have one on K15. But, again, you would have to ask
10 Philip Heath why he was so —

11 Q. No, I'm asking about your understanding as to why he was
12 so very pleased about it.

13 A. Oh, I cannot comment on why he was so excited.

14 Q. Let's look, please, at the final issued version of the
15 certificate and the approval summary.

16 Can we go, please, to {KIN00005705}. This is the
17 actual certificate on the first page; yes?

18 A. Yes.

19 Q. Do you have it, Mr Pack?

20 A. Yes.

21 Q. It's dated 1 May 2009 in the top right-hand corner.

22 A. Yes.

23 Q. Then looking at the top of the first page, we see the
24 certificate holder's details, obviously that's Kingspan,
25 and at section 2, the description. It says:

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1 "System Title.
 2 "Description: Kingspan Kooltherm K15 Rainscreen
 3 Board."
 4 Yes?
 5 A. Yes.
 6 Q. Then we see section 3, documents — and then a section
 7 about documents relied on to carry out the assessment,
 8 and various other details.
 9 I want to take you over, please, to page 3
 10 {KIN00005705/3}. There is a blank page at page 2, so on
 11 to page 3, please. We see a section there at the top
 12 called "Overview".
 13 A. Yes.
 14 Q. It describes K15. And a section called "The System".
 15 A. Yes.
 16 Q. Do you see that?
 17 A. Yes.
 18 Q. Essentially that section, "The System", says the overall
 19 wall construction must reflect standard design details
 20 as shown in the eighth issue of Kingspan's marketing
 21 literature.
 22 A. Yes.
 23 Q. And that is the marketing literature you provided to him
 24 at your meeting; yes?
 25 A. Yes.

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1 Q. Can we go on to the fourth page {KIN00005705/4}, please,
 2 under the heading "Requirement B — Fire Safety
 3 Considerations". It's about halfway down the page.
 4 There the summary reads:
 5 "K15 has been tested in accordance with ..."
 6 Then lists four tests: BS 8414—1, EN 1364—1, and
 7 then 476—6 and 7. Under that, we see these words:
 8 "From the results, it can be considered as
 9 a material of limited combustibility and meets the
 10 criteria for Class 0 classification for surface spread
 11 of flame."
 12 Moving on to page 5 {KIN00005705/5}, please, under
 13 the heading "Requirement B4; External Fire Spread", we
 14 see this:
 15 "Since K15 can be considered a material of limited
 16 combustibility, it is suitable for use in all situations
 17 shown on Diagram 40 of Approved Document B Volume 2,
 18 including those parts of a building more than 18m above
 19 the ground. In the latter circumstances, the cladding
 20 system and the substrate to which the insulation is
 21 applied must also meet the requirement for limited
 22 combustibility. Where the substrate is a metal—framed
 23 wall system rather than masonry or concrete,
 24 a non—combustible lining board must be specified to the
 25 external face of the metal frame wall ..."

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1 I want to ask you this, first, please: you knew at
 2 the time this certificate was issued — and had,
 3 I think, always known — that K15 is not a material of
 4 limited combustibility, is it?
 5 A. That's correct.
 6 Q. Do you accept that the most natural reading of the two
 7 sections on fire in this certificate we have just looked
 8 at is that K15 can be considered to be a material of
 9 limited combustibility?
 10 A. Yes, the way it's wrote.
 11 Q. The way it's read?
 12 A. Or the way it's read. My only understanding is that —
 13 is this because it was classed as a system that somehow
 14 the wording has been moved away from just K15 and is
 15 treating it as an overall system?
 16 Q. The problem is K15 is not a system, is it?
 17 A. No, I agree, but I'm thinking is — I'm just trying to
 18 think why that wording was put in the way it is.
 19 Q. Mr Pack, you had seen that wording in the draft.
 20 A. Sorry?
 21 Q. You had seen that wording in the draft.
 22 A. I would have seen that wording in the draft, yes. I can
 23 only think that — why was that wording used? Was it
 24 because it was based upon a substrate of limited
 25 combustibility and a masonry wall of non—combustibility,

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1 and therefore when you go to diagram 40 and you test
 2 an insulation above 18 metres, it can be read that — is
 3 that material following the fact that it could be
 4 classed as limited combustibility?
 5 Q. I'm sorry, I don't follow.
 6 Can we just be a bit simpler about this: do you
 7 accept that the overall effect of this is to suggest to
 8 a reader that K15 is a material of limited
 9 combustibility?
 10 A. Yes.
 11 Q. And that is absolutely not correct, is it?
 12 A. Correct.
 13 Q. You didn't notice that in the draft? You didn't think
 14 to correct it?
 15 A. I guess we relied upon the advice of the LABC,
 16 Herefordshire Council. This wording will have been
 17 pulling together — because it's not just one sentence
 18 there, it's referencing the cladding, it's referencing
 19 the substrate, they're referencing diagram 40, they're
 20 referencing Approved Document B. I mean, when you look
 21 at it, it's not just isolating the insulation on its
 22 own. So that's what I'm trying to say: has it been
 23 written in a way that it's considering the whole
 24 construction, it's not just taking the insulation on its
 25 own? However, I do agree; in hindsight, that could have

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1 been reworded slightly better.
 2 Q. Well, when you say it could have been reworded slightly
 3 better, do you mean the words "Since K15 can be
 4 considered a material of limited combustibility" ought
 5 to have been removed?
 6 A. Yes, I agree that "limited combustibility" in the same
 7 sentence as "Since K15" could have been —
 8 Q. It's plainly misleading, isn't it?
 9 A. It is misleading, but you've got to read the rest of the
 10 paragraph that follows it.
 11 Q. Well, let's do that. It says there:
 12 "Since [it] can be considered a material of limited
 13 combustibility, it is suitable for use in all situations
 14 shown in diagram 40 of [ADB] ... including those parts
 15 of a building more than 18m above the ground."
 16 There is absolutely no restriction, qualification or
 17 caveat there on the use of K15 on buildings more than
 18 18 metres above the ground, is there? It says "all
 19 situations".
 20 A. It does, it says:
 21 "Where the substrate is a metal ... wall system
 22 rather than masonry or concrete, a non-combustible ...
 23 board must be specified ..."
 24 And I think if you move further into the document,
 25 it actually refers to the fact that the cladding has to

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1 be limited combustibility.
 2 In fact, it's the sentence above, actually. It
 3 says:
 4 "... the cladding system and the substrate to which
 5 the insulation is applied must also meet the
 6 requirements for limited combustibility."
 7 So that makes me think that if the cladding is of
 8 limited combustibility, and the masonry substrate is of
 9 limited combustibility, K15 can be considered to be used
 10 in those parts of a building more than 18 metres.
 11 Q. It's incredibly confusing, isn't it?
 12 A. It is. I agree, it's not worded the best. But our
 13 understanding was that as long as the substrate was of
 14 limited combustibility, the cladding was of limited
 15 combustibility, which is what I go back to previously in
 16 my statements and today, that was the understanding.
 17 Clearly you can see that the other types of cladding
 18 that we discussed earlier have not been included.
 19 SIR MARTIN MOORE-BICK: I'm sorry to interrupt you,
 20 Ms Troup, but, Mr Pack, can you help me with this: you
 21 were, or at least certainly are now, familiar with the
 22 relevant provisions of ADB; I think that's right, isn't
 23 it?
 24 A. Sorry, can you say that again, please?
 25 SIR MARTIN MOORE-BICK: You are familiar with the relevant

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1 provisions of ADB which deal with insulation?
 2 A. Now or back in 2008?
 3 SIR MARTIN MOORE-BICK: Well, both, but in 2008, you knew
 4 that ADB required insulation to be of limited
 5 combustibility?
 6 A. Yes, above 18 metres, yes.
 7 SIR MARTIN MOORE-BICK: ADB does not say that that
 8 requirement is in any sense dependent on the substrate
 9 or the rainscreen, does it?
 10 A. I cannot recall what the actual paragraph says.
 11 SIR MARTIN MOORE-BICK: Well, I'm curious to know why you
 12 think that K15 could be used as insulation in a case
 13 where the substrate and the cladding were of limited
 14 combustibility if that didn't appear in ADB.
 15 A. Okay. So, as I mentioned earlier today, our
 16 understanding was that from the advice of LABC through
 17 this document, they were clearly telling us that it can
 18 be.
 19 SIR MARTIN MOORE-BICK: So you preferred their advice to the
 20 provisions of the guidance, did you?
 21 A. Well, I guess we just relied upon the LABC as they were
 22 the third party that were involved with this type of
 23 process and approval. So they were the one that came up
 24 with this particular text and the fact that they worded
 25 it in a way that it could be used behind a cladding of

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1 limited combustibility and the substrate of limited
 2 combustibility.
 3 SIR MARTIN MOORE-BICK: All right. Thank you very much.
 4 Yes, Ms Troup.
 5 MS TROUP: Thank you.
 6 I want to take you back, please, to David Jones'
 7 evidence, {HBC00000029/36}. Looking at the penultimate
 8 paragraph of his evidence on that page, he says this:
 9 "On the basis of my knowledge at that time the range
 10 of evidence in a) to h) above [that's from his own
 11 witness statement] was sufficient for me to make
 12 a judgement that K15 could be considered a material of
 13 limited combustibility."
 14 Do you see that his understanding, the author of the
 15 certificate, appears to have been exactly as it reads:
 16 that K15 was to be considered to be a material of
 17 limited combustibility?
 18 A. I cannot comment on how David Jones made the judgement
 19 that K15 could be considered to be a material of limited
 20 combustibility.
 21 Q. I'm not asking you to comment on how he made the
 22 judgement, Mr Pack, I'm just asking you — well, let me
 23 put it differently: does it surprise you to learn that
 24 in fact he meant the certificate to be read exactly as
 25 it does read on a natural reading, that K15 could be

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1 considered to be a material of limited combustibility?
 2 A. It would read that way, yes.
 3 Q. And that is utterly wrong, isn't it?
 4 A. Correct.
 5 Q. All right.
 6 Is it genuinely your evidence that you did not know
 7 that is what he meant to say in his type approval
 8 summary document?
 9 A. Yes, correct.
 10 Q. You did not know he was under that impression when you
 11 saw the draft?
 12 A. Correct.
 13 Q. Do you think you should have noticed this when you saw
 14 the draft?
 15 A. In hindsight, yes. But I — at the time when I received
 16 this, I passed it to the technical team that are
 17 involved with this side of the business for them to
 18 check over. But in hindsight, I agree, the wording
 19 could be seen as indicating that the K15 was of
 20 a material of limited combustibility.
 21 Q. Can we go, please, to {KIN00005385}. This is an email
 22 into which you and Gareth Mills, again, are copied, and
 23 it's an email from Ivor Meredith to Mark Swift. In it
 24 he says this. Let's look at the subject title,
 25 "Approved Document B as discussed", and you can tell me

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1 in a moment whether you remember it:
 2 "Personally I would just say that we now have the
 3 LABC document and as long as the guidance within it is
 4 followed [there] are no limitations of use for K15 in
 5 high rise external ventilated facades.
 6 "This document will be available to all LABC
 7 therefore we will not get any problems in the future
 8 when seeking approval for use from Local Authority
 9 Building Control Officers.
 10 "From now on when challenged I'm simply going to
 11 send the LABC document and let that do the talking.
 12 "I have copied AP and GM to allow them to comment."
 13 Do you remember reading that email, Mr Pack?
 14 A. No.
 15 Q. Do you know whether or not you offered any comments?
 16 A. I do not recall the email and I do not recall any
 17 comments, and I —
 18 Q. He has — I'm sorry, go ahead.
 19 A. And I would disagree with what's written in that email.
 20 Q. What would you disagree with in it?
 21 A. That the LABC document didn't give ... didn't state that
 22 there are no limitations. There were limitations to the
 23 use of K15. So I don't agree with that sentence where
 24 it says:
 25 " ... LABC document and as long as the guidance

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1 within it is followed [there] are no limitations ..."
 2 There were limitations within the — in the
 3 document.
 4 Q. What limitations were there within the document?
 5 A. In terms of the masonry back — sorry, in terms of the
 6 substrate, in terms of the cladding, and there was
 7 also — if you refer to the certificate, if we could
 8 bring that up on screen, please.
 9 Q. Of course, it's {KIN00005705}.
 10 A. So if you go to where it says "Conditions of the
 11 Certification".
 12 Q. Yes.
 13 A. Number 4.
 14 Q. Yes.
 15 A. It says:
 16 "This certificate should not be regarded as a formal
 17 approval under the Building Regulations."
 18 Q. I'm so sorry, I don't the relevance. Of course
 19 it's not a formal approval, it's a certificate.
 20 A. So —
 21 Q. How is that a restriction on the use of K15 over
 22 18 metres?
 23 A. So what I'm saying is that, if you go back to the email
 24 that was just wrote to say that — sorry, can we go back
 25 to the ...

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1 Q. Yes, of course, I'm so sorry. It's {KIN00005385}.
 2 There it is.
 3 A. So where we're talking about there being no
 4 limitations —
 5 Q. Yes.
 6 A. — there are limitations because we have to still prove
 7 that the construction we're using meets the
 8 Building Regulations.
 9 Q. Yes, and bearing in mind that K15 is a combustible
 10 material, that could be done through testing to 8414 and
 11 a system meeting the criteria in BR 135; yes?
 12 A. Yes.
 13 Q. All right. You say that you don't remember receiving
 14 this email. Were you aware that Ivor Meredith, as
 15 technical project leader, was of the view that what this
 16 certificate granted or gave to Kingspan was the ability
 17 to say that there were no further limitations on the use
 18 of K15 on high-rise buildings?
 19 A. No, I disagree with that.
 20 Q. You might disagree with it; were you aware that that was
 21 the strategy?
 22 A. No.
 23 Q. Nobody discussed that with you?
 24 A. No.
 25 Q. You heard no one talking about it?

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1 A. No.
 2 Q. Did you ever hear anyone saying that the LABC document
 3 would do the talking or anything of that nature?
 4 A. No.
 5 Q. Do you accept, having looked at the fire sections of the
 6 certificate, that that would only work, the LABC
 7 certificate could only give Kingspan the opportunity to
 8 say that there were no further limitations for the use
 9 of K15 over 18 metres, if it was read as meaning that
 10 K15 is a material of limited combustibility?
 11 A. Sorry, say that question again, please?
 12 Q. It was far too long a question.
 13 The only situation in which there could be no
 14 limitation for the use of an insulation material above
 15 18 metres would be if it was non-combustible or
 16 a material of limited combustibility —
 17 A. Correct.
 18 Q. — do you accept that?
 19 A. Yes.
 20 Q. So the only way in which Mr Meredith and others within
 21 Kingspan could be thinking that this certificate gave
 22 them licence to say "There are no further limitations"
 23 is if it was being understood to mean K15 is a material
 24 of limited combustibility or can be considered to be
 25 one?

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1 A. Okay, I understand your point. I cannot comment on what
 2 Ivor Meredith was taking from this certificate and this
 3 approval, I can only comment on what — my recollection
 4 at the time, and my recollection at the time was that it
 5 was worded in a way that it didn't give us free licence,
 6 it did limit us, and it did only allow us to be used
 7 behind a non-combustible cladding.
 8 Q. But the limitations, you say, are the fact that it
 9 doesn't constitute a formal approval under the
 10 Building Regulations — which, forgive me, is just
 11 obvious from the fact that it's a certificate — and
 12 that it contains the sentence about putting
 13 a non-combustible liner onto steel-framed systems; yes?
 14 Those are the limitations?
 15 A. Yeah, and it also mentions that the substrate and the
 16 cladding must be of limited combustibility.
 17 Q. Yes.
 18 A. I know it breaks down the masonry and the steel frame,
 19 but it also says that the substrate must be of limited
 20 combustibility. Now, that can either — well, at the
 21 time, as I said earlier today, my understanding was that
 22 was either a masonry background or a steel stud with
 23 a non-combustible lining. That was my terminology in my
 24 head that I thought was what it meant. So therefore the
 25 certificate said you had to have a substrate of limited

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1 combustibility. It also mentions that the cladding had
 2 to be of limited combustibility too.
 3 Q. Can we go back, please, to Philip Heath's "great news"
 4 email at {KIN00005383}. I understand you have already
 5 told us that you have seen this before.
 6 A. Yes.
 7 Q. I just want to look at it again. He says there:
 8 "GREAT NEWS!
 9 "Please find attached [LABC] Approval for K15 ..."
 10 And he goes on to give a summary, I suppose, of what
 11 LABC approval is and what the certificate does, what the
 12 benefits are.
 13 I'm going to ask again: at this stage, did you
 14 understand what it was that Philip Heath saw as cause
 15 for celebration?
 16 A. Only the fact that we'd got another LABC approval
 17 following the previous — with the tapered insulation.
 18 I didn't see it other than — anything more than it was
 19 a nice to have, but I would certainly not use it as
 20 a carte blanche approach to go out there to say that you
 21 can use K15 behind all types of cladding and forget
 22 doing fire testing. That is not how I read this at the
 23 time.
 24 Q. Well, if we look at the third paragraph of his email,
 25 please, he says this:

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1 "The highlight of this Certificate and supporting
 2 documentation is the Requirement under B4 of AD B —
 3 External Fire Spread."
 4 Then he sets it out verbatim from the approval:
 5 "Since K15 can be considered a material of limited
 6 combustibility ..."
 7 Do you see that he's even used bold font there for
 8 the words "material of limited combustibility"?
 9 A. Yes.
 10 Q. That is the particular section which is the focus of his
 11 celebration, isn't it, clearly?
 12 A. If — clearly with — yes, but I can't understand what
 13 was going through Philip's mind when he wrote it, but
 14 you're right, he has highlighted "material of limited
 15 combustibility", but if you carry on reading that
 16 paragraph, what he could have highlighted was:
 17 "In the latter circumstances, the cladding system
 18 and the substrate to which the insulation is applied
 19 must also meet the requirements for limited
 20 combustibility."
 21 That should have been highlighted in his email.
 22 Q. Well, forgive me, that's the second time you've referred
 23 to that sentence and I'm trying to understand how you
 24 think that assists in making the situation clearer.
 25 What it says is:

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1 "In the latter circumstances ..."
 2 Now, that is a reference to those parts of
 3 a building more than 18 metres above ground, isn't it,
 4 in the previous sentence? So:
 5 "In the latter circumstances [meaning over
 6 18 metres], the cladding system and the substrate to
 7 which the insulation is applied must also meet the
 8 requirement for limited combustibility."
 9 The word "also" meaning, in ordinary language, "as
 10 well as".
 11 So the cladding system, the outer panels, and the
 12 substrate, must also meet the requirement for limited
 13 combustibility, as in as well as K15, as though K15
 14 meets that requirement. That's in fact what that says,
 15 isn't it?
 16 A. Yes. What I don't know is: is that a mirror image of
 17 what was written in the certificate or is that his text
 18 that's being used there? But all I remember —
 19 Q. It's a mirror image, I can confirm that.
 20 A. Okay, thank you. All I can record is that I do not know
 21 why he highlighted it in bold, and all I can recall is
 22 that, as far as I was aware, the cladding had to be of
 23 limited combustibility and so did the substrate, before
 24 our product could be considered.
 25 Q. I think if we can go down to the top of the next page

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1 {KIN00005383/2}, please, he also uses bold font for your
 2 name there. Do you see that?:
 3 "Special thanks go to Andrew Pack for his consistent
 4 endeavors driving this forward with the LABC ..."
 5 A. Yes.
 6 Q. What were your thoughts on that at the time?
 7 A. I guess he was just thanking me for the small amount of
 8 work that I did on the system approval. I — other than
 9 just saying thank you, I do not recall what was behind
 10 highlighting my name in bold.
 11 Q. No, but he is not thanking you for your small admin
 12 role, is he? He is thanking you for your "consistent
 13 endeavours driving this forward".
 14 A. I'm not sure what the "consistent endeavours driving
 15 this forward" entails, because there certainly wasn't
 16 consistent endeavours from my side.
 17 Q. So is it fair for me to put it in this way: from this
 18 email it looks as though this is a pretty important
 19 moment in the story or the life of K15, and your
 20 evidence is that you don't really know why that is, it
 21 was a nice to have, and you don't know why he's focused
 22 on the words "material of limited combustibility"?
 23 A. Yes.
 24 Q. All right.
 25 Can we look very quickly, please, at a press

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1 release. It's {KIN00008748}. The date on the top
 2 left —hand side is 3 July 2009; yes? We see this:
 3 "Kingspan first to make the grade with LABC."
 4 Do you see that?
 5 A. Yes.
 6 Q. All right.
 7 Do you know who Kingspan would routinely send their
 8 press releases to?
 9 A. No.
 10 Q. Do you remember ever seeing this one?
 11 A. No.
 12 Q. Right.
 13 Can we just go — no, we'll leave that there,
 14 I think. We'll leave that one there.
 15 I'm going to talk a little about what happened after
 16 the LABC certificate was obtained in May 2009. We don't
 17 need to go to it, but Mr Heath has given evidence to
 18 this Inquiry to the effect that, following that
 19 certificate being obtained, he gave instructions that no
 20 further large-scale fire testing should be carried out
 21 on K15. Did he give that instruction to you?
 22 A. No, not as far as I recall.
 23 Q. Were you aware of that instruction or that that was the
 24 effect of having obtained the LABC certificate?
 25 A. No, I was not aware.

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1 Q. Can we just go back, please, to {KIN00005383/2}, please.
 2 We have already seen there, that's where he offers
 3 special thanks to you.
 4 A. Yes.
 5 Q. Then in the second part of that sentence, he says — so
 6 this is towards the end of the first line:
 7 "... and for the time being this should complete the
 8 tool kit for K15 Rainscreen Board."
 9 Do you see that?
 10 A. Yes.
 11 Q. What does that mean?
 12 A. I do not know.
 13 Q. Do you remember seeing that at the time?
 14 A. No.
 15 Q. Do you remember the technical advisers being told that
 16 their toolkit for selling K15 was now complete?
 17 A. No.
 18 Q. And then, last line:
 19 "In the event you require further information on
 20 this please contact either Andrew or myself."
 21 Do you see that?
 22 A. Yes.
 23 Q. Do you remember seeing that?
 24 A. No.
 25 Q. Why was he directing queries to you?

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1 A. I can only think because I was obviously the person that
 2 was involved with the LABC type approval. So I can only
 3 think that he put me on that email because of that.
 4 Obviously this system type approval, this obviously
 5 only had a three-year shelf life, I believe, as well,
 6 and the appropriate people were involved in the
 7 certification following on from this document.
 8 I believe it was around 2009, just after this happened,
 9 that I actually moved into emerging markets, and the
 10 pre — the subsequent document I believe changed to some
 11 other format, which I was never involved with, from
 12 the — so from the moment that that email was sent out
 13 from Phil Heath saying about this LABC document, I've
 14 never been involved with LABC since that date. The
 15 appropriate people have now been involved over the last
 16 12 years. I believe it has been updated every
 17 three years. It's not called an LABC type approval
 18 anymore.
 19 Q. No.
 20 A. I believe they call it a registered details document.
 21 And we've had the technical projects team working on
 22 that every three years to update it. I've no idea what
 23 the new approvals look like these days. But as to why
 24 he put my name on that document, I can only think it was
 25 because of my involvement with obtaining that LABC.

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1 Q. Yes, and did you have any queries or enquiries about it,
 2 can you remember?
 3 A. When the document came through in May 2009, I was then
 4 starting to look into Australia, New Zealand and Asia,
 5 so my remit changed and my focus turned away from the
 6 UK. So I never had any email correspondence, any
 7 sort of further communication in regards to this
 8 certification, so I never got any feedback or what was
 9 the outcome of this document. So all I can say is at
 10 the moment that that was issued, that was the last that
 11 I had involvement with it.
 12 MS TROUP: Mr Pack, those are the end of my questions for
 13 you for now, but I'm going to hand over back to
 14 the Chairman because it may be that there are questions
 15 from others at this stage. So if you could wait for
 16 a moment, please.
 17 SIR MARTIN MOORE-BICK: Yes. Well, Mr Pack, when counsel
 18 has got to the end of her questions, we always have
 19 a short break, because there are other people following
 20 the Inquiry who need an opportunity to consider whether
 21 there should be further questions asked.
 22 So we're going to take another short break now
 23 until, I think, 4.40 our time. I'm sorry it is going on
 24 into the evening a bit for you, and I apologise for
 25 that, but I don't think we will be taking too long.

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1 We will come back at 4.40 and see whether there are
 2 any more questions for you. All right?
 3 Please remember, don't talk to anyone else about
 4 your evidence during the break. All right?
 5 THE WITNESS: Thank you.
 6 SIR MARTIN MOORE-BICK: Thank you very much.
 7 THE WITNESS: Thank you.
 8 (4.26 pm)
 9 (A short break)
 10 (4.40 pm)
 11 SIR MARTIN MOORE-BICK: Hello, Mr Pack, we're back with you.
 12 Are you with us?
 13 THE WITNESS: Yes, good afternoon.
 14 SIR MARTIN MOORE-BICK: Hello again. So you can see me and
 15 hear me?
 16 THE WITNESS: Yes, I can, thank you.
 17 SIR MARTIN MOORE-BICK: Good. Now we will find out from
 18 Ms Troup whether there are any more questions for you.
 19 Ms Troup?
 20 MS TROUP: Thank you. There are no further questions for
 21 this witness.
 22 SIR MARTIN MOORE-BICK: Right, thank you very much.
 23 Well, Mr Pack, I'm sorry we kept you for the extra
 24 quarter of an hour, but sometimes there are further
 25 questions. So it just remains for me really to thank

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1 you very much indeed for making yourself available to
 2 give evidence. It's been very useful to hear what you
 3 have to tell us. And I'm grateful to you for making
 4 yourself available at a rather odd time of day, because
 5 it must now be, what, coming up to 9 o'clock in your
 6 local time?
 7 THE WITNESS: Yes, it is, yes.
 8 SIR MARTIN MOORE-BICK: So we have ruined your evening, but
 9 I'm sorry about that. We are grateful to you.
 10 THE WITNESS: Thank you.
 11 SIR MARTIN MOORE-BICK: There are no more questions, and now
 12 you are free, so to speak, to go and talk to anyone you
 13 like. All right?
 14 THE WITNESS: Yes.
 15 SIR MARTIN MOORE-BICK: Thank you very much indeed.
 16 Thank you. Goodbye.
 17 THE WITNESS: Goodbye.
 18 (The witness withdrew)
 19 SIR MARTIN MOORE-BICK: Right, well, thank you very much,
 20 Ms Troup. We have a different witness tomorrow morning.
 21 We're going to begin taking evidence from Ms French of
 22 Arconic.
 23 Is there anything else we need to do this evening
 24 before we close?
 25 MS TROUP: No, I don't think so.

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1 SIR MARTIN MOORE-BICK: Good.
2 Well, thank you very much again, and that's it for
3 the day. We will resume at 10 o'clock tomorrow. Thank
4 you very much.
5 (4.45 pm)
6 (The hearing adjourned until 10 am
7 on Tuesday, 9 February 2021)

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