



Grenfell Tower Inquiry

Day 108

March 17, 2021

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1 Wednesday, 17 March 2021
 2 (10.00 am)
 3 MR BRIAN MOORE (continued)
 4 SIR MARTIN MOORE—BICK: Good morning, everyone. Welcome to
 5 today's hearing. Today we're going to start by hearing
 6 further evidence from Mr Brian Moore. So my first task
 7 is to check that he is here with us and can see me and
 8 hear me satisfactorily.
 9 Good morning, Mr Moore, are you there?
 10 THE WITNESS: Good morning, Mr Chairman. Yes, I am, and
 11 I can hear you and see you clearly.
 12 SIR MARTIN MOORE—BICK: Very good, thank you.
 13 Well, today, as always, I'm joined by my fellow
 14 panel members, Ms Istephan and Mr Akbor, who are with
 15 me.
 16 MS ISTEPHAN: Good morning.
 17 MR AKBOR: Good morning.
 18 SIR MARTIN MOORE—BICK: Mr Moore, I think we had better run
 19 through the housekeeping just for the form's sake,
 20 before we actually start taking your evidence.
 21 So can I ask you to confirm that you're alone in the
 22 room from which you're giving evidence?
 23 THE WITNESS: I confirm that.
 24 SIR MARTIN MOORE—BICK: Thank you.
 25 Can you confirm that you don't have any documents or

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1 other materials with you?
 2 THE WITNESS: I confirm that.
 3 SIR MARTIN MOORE—BICK: Thank you.
 4 Finally, can you confirm that your mobile phone is
 5 in another room and that you don't have any other
 6 electronic device with you which is capable of receiving
 7 messages?
 8 THE WITNESS: I confirm that.
 9 SIR MARTIN MOORE—BICK: Well done, thank you very much.
 10 Now, the procedure today will be the same as it was
 11 yesterday. I hope we shan't have any interruptions. We
 12 shall, on the other hand, have a short break part-way
 13 through the morning, round about 11.15, and as I told
 14 you yesterday, if you want additional breaks, just
 15 indicate and we will do our best to accommodate you.
 16 All right. Anything you would like to raise with me
 17 at this stage?
 18 THE WITNESS: No, thank you.
 19 SIR MARTIN MOORE—BICK: All right. In that case, I will
 20 invite Mr Millett to continue questioning you.
 21 Yes, Mr Millett, when you're ready.
 22 Questions from COUNSEL TO THE INQUIRY (continued)
 23 MR MILLETT: Good morning, Mr Chairman, good morning,
 24 members of the panel, and good morning, Mr Moore.
 25 Can I please ask for {BBA00000047} to be displayed

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1 on the screen. This is the BBA certificate for
 2 Arconic's Reynobond 55 panels issued on 14 January 2008
 3 that we looked at yesterday. I want now to come on to
 4 your involvement relating to that certificate and ask
 5 you some questions about it in the post-fire time. But,
 6 before we do that, I would like to ask you one or two
 7 questions about the review and re-issue processes in
 8 respect of that certificate, starting in 2014.
 9 I'm going to summarise what we've heard so far.
 10 Valentina Amoroso told us that review number 2,
 11 effectively, of this certificate, S153729, started in
 12 October 2013 with an email from Maria Barbeito from the
 13 BBA to Claude Schmidt at Arconic, seeking information.
 14 We heard, summarising it, that both Maria Barbeito
 15 and then Valentina Amoroso from December 2014 sent
 16 repeated messages of request to Arconic for supporting
 17 material on numerous occasions.
 18 We heard from Ms Amoroso that, come January 2015,
 19 having not received any of the information from Arconic
 20 the subject of those repeated requests over some
 21 16 months or so, she closed the review and went ahead
 22 with what information she held in hand to draft the
 23 review report.
 24 That's the summary of where we've got to.
 25 Now, I want to show you, before I come to my

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1 question, what Mr Nkomo told the Inquiry yesterday,
 2 {Day107/48:4}. Let me put to you what he told us, that
 3 he would have:
 4 "... signed off to close the review with what we
 5 have, because that was the process that we were
 6 following. If we are not getting all the information
 7 and we have been chasing, chasing, the instruction was
 8 you complete the review with what you have ..."
 9 Do you agree that there was a standing instruction
 10 to project managers to complete the review with what you
 11 have?
 12 A. I don't recall there being a standing instruction, but
 13 that — in certain cases that wouldn't be appropriate,
 14 would it? So I don't believe that was the case,
 15 a standing instruction.
 16 Q. Well, you say in certain cases it wouldn't be
 17 appropriate, and it wasn't a standing instruction; in
 18 what cases would it not be appropriate?
 19 A. Well, if there was just completely insufficient
 20 information available for a project manager to be able
 21 to make an assessment and a judgement, and what that
 22 might look like would depend on the facts of the case,
 23 but just logically, if one can't assess, then one can't
 24 assess.
 25 Q. Well, let me show you a little bit more of what was said

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1 by Mr Nkomo.
 2 Can we go to the bottom of page 47 {Day107/47},
 3 please, of his transcript. You can see that Mr Nkomo is
 4 asked at line 12:
 5 "Question: Were you aware of a decision, as she
 6 puts it, to go ahead with the information already in
 7 hands?
 8 "Answer: I think I would have been aware of that,
 9 yes, because the report ultimately came to myself for
 10 checking and signing off, yes.
 11 "Question: I see.
 12 "Would Valentina Amoroso have had the authority to
 13 make that decision?
 14 "Answer: Not just Valentina. Generally we would
 15 close the reviews if we were not receiving all the
 16 email — we wouldn't keep them open forever, you would
 17 just finish it up, make conclusions with what
 18 information you have and close the job. That was common
 19 practice.
 20 "Question: I see. We will come back to that
 21 answer. I just want to know: who was the
 22 decision-maker? Who would have had the authority to
 23 close the review with the information already in hand?
 24 "Answer: In this case, I would have signed off to
 25 close the review with what we have, because that was the

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1 process we were following at the time. If we are not
 2 getting all the information and we have been chasing,
 3 chasing, the instruction was you complete the review
 4 with what you have and we close the job, with the
 5 decision obviously of what the information gives you."
 6 Now, I've shown you quite a bit there of Mr Nkomo's
 7 evidence. Is that something you agree with on the basis
 8 of your experience at the time?
 9 A. It would be not very usual that there isn't information
 10 to be able to make a decision on. Generally that
 11 wouldn't be a satisfactory way to proceed. But I think
 12 I can read the sense of what Mr Nkomo is saying and
 13 I can see why you mentioned a standing instruction.
 14 If there was sufficient information for the assessor
 15 to be able to come to a view, then come to the view that
 16 you can.
 17 I'm not sure it's a stand — no, I don't believe
 18 there's a standing instruction to do this. There's
 19 a judgement to be applied. But I think I can understand
 20 what Mr Nkomo is saying, but I don't think it goes as
 21 far as being suggested it's a standing instruction.
 22 Q. Was there a general policy or common practice, to use
 23 his expression?
 24 A. Well, the common practice, of course, is if you have
 25 sufficient information to make a decision, make it, and

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1 if you don't have sufficient information to come to
 2 a judgement, then don't make up — sorry, I'm not being
 3 facetious, but I'm just saying that that would be the
 4 approach that would be applied. I'm not sure it's a —
 5 certainly not an instruction, a policy, a common-sense
 6 approach, perhaps.
 7 Q. Well, it may or may not be a common-sense approach,
 8 Mr Moore. What I'm seeking to get to the bottom of with
 9 you is: was it a policy or methodology or approach
 10 generally followed by project managers that even if they
 11 hadn't had answers to questions they'd raised from
 12 certificate holders, they would and could nonetheless
 13 proceed to close the review?
 14 A. I would say if they had sufficient information — if
 15 everything wasn't answered, then sometimes, you know,
 16 that would arise, they wouldn't get all the responses
 17 that they would want. But if they had sufficient
 18 information to be able to reach a decision and make
 19 a judgement, then do so, I would say would be the
 20 approach. I can't describe that as a formal policy, as
 21 a way of sensible working.
 22 Q. Was there any guidance or any process for project
 23 managers and their line managers to follow if they were
 24 getting no response from a certificate holder to
 25 requests for information they thought were necessary or

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1 relevant?
 2 A. If the information that wasn't available was so
 3 significant, such as the person was not able to make
 4 an assessment and come to a judgement, then escalate
 5 that, because there would be decisions then about the
 6 ongoing validity of the certificate.
 7 Q. So would you have expected Valentina Amoroso or
 8 Prayer Nkomo to have escalated a repeated and
 9 long-standing failure by a certificate holder to provide
 10 information that they had asked for, or Valentina, as
 11 the project manager, at least, had asked for?
 12 A. Yes, if the information was significant enough that
 13 Valentina or anybody else was not able to come to
 14 an assessment/judgement, then yes, escalate that.
 15 Q. When you say not able to come to an assessment or
 16 judgement, what do you mean, not able to come to
 17 an assessment or judgement?
 18 A. If the information that they needed was important to the
 19 continuing validity of a certificate, and they didn't
 20 have that information, then yes, they should escalate
 21 that.
 22 Q. Would you expect a project manager to be pressing
 23 repeatedly for information that he or she did not regard
 24 as important to the review?
 25 A. I would expect them to be pressing a lot for information

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1 they thought appropriate and necessary. Sometimes, if
 2 they were just following by rote a list of things,
 3 perhaps some of those points aren't essential. But if
 4 they're pressing and pressing for something that they
 5 consider important and pivotal to the assessment
 6 decision and they weren't getting it, then yes, please
 7 escalate that.

8 Q. Would those be circumstances in which the suspension of
 9 the certificate should have been or would have been
 10 considered?

11 A. If the information that was sought was important and
 12 pivotal to the ongoing validity of the certificate, and
 13 the contractual position with a client would be that
 14 they have to provide information to us, then yes, that
 15 would be grounds for discussion as to whether suspension
 16 is appropriate.

17 SIR MARTIN MOORE—BICK: Mr Millett, forgive my interrupting.
 18 I think I would find it helpful if Mr Moore could be
 19 asked to put this in context.

20 We're talking about a review certificate, and the
 21 question is: how should the person concerned respond if
 22 the question to which he or she is not receiving
 23 an answer is: has anything changed? Because you've
 24 obviously got material already before you because, by
 25 definition, it's a review, but what you want to know is:

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1 has anything changed? Now, how do you respond if you
 2 don't get an answer to that?

3 A. Has anything changed? Well, that could be — it could
 4 be significant. Again, it would depend on what was
 5 known about the certificate, what was the feedback
 6 from — if there had been audits of it all. This would
 7 have to be seen in the round, but it potentially could
 8 be significant if they weren't getting a response, but
 9 in some cases it may not be that significant if we knew
 10 a lot about the product.

11 So, I'm sorry, it could be significant, but in some
 12 cases it may be less so.

13 SIR MARTIN MOORE—BICK: Thank you very much.
 14 Yes, Mr Millett.

15 MR MILLETT: Mr Moore, let me try the Chairman's question
 16 again on the basis that the request was for confirmation
 17 that nothing would have changed which would affect the
 18 validity of the certificate. What then, if there was no
 19 answer after repeated requests?

20 A. Well, if in doubt, if the assessor or their manager
 21 feels that it is significant and they can't make — they
 22 can't come to a reasonable and fair and objective
 23 decision, escalate it. If in doubt, escalate. I don't
 24 think there's any harm in escalating something to see if
 25 others can assist.

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1 Q. Well, you say you don't think there's any harm in
 2 escalating. What I'm really putting to you is: was
 3 there a system in place whereby, if project managers
 4 refused after repeated attempts to get confirmation that
 5 there were no changes which otherwise might undermine
 6 the validity of the certificate, the project manager and
 7 their line managers would escalate that to senior
 8 management?

9 A. So in terms of there being a document, a written policy
 10 of, "If after two or three attempts to get something you
 11 don't get it, escalate", no, I don't believe there —
 12 I don't believe, and I'm more sure than not, that there
 13 is such a written policy.

14 Q. The same question: was there a system in place whereby,
 15 if questions such as that were repeatedly left
 16 unanswered, those would be grounds for considering
 17 suspension of the certificate?

18 A. Yes, if the grounds were significant and would affect
 19 the ability to make the decisions I've been talking
 20 about, that would be grounds for consideration of
 21 suspension.

22 Q. Now, Ms Amoroso told us that the only occasion when the
 23 BBA would threaten not to re-issue a certificate is when
 24 the certificate holder would deny access to the factory.
 25 That was {Day106/82:6}. Was she right about that?

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1 (Pause)

2 A. No, I don't believe so. In my own experience, and
 3 certainly at or about 2016, I was dealing with a case
 4 which was not like that, where someone was either
 5 withholding information or presenting us with different
 6 information than we thought we should receive. I not
 7 only threatened suspension, I did suspend. So, no,
 8 I don't think that that was the only criterion upon
 9 which a decision to suspend would be made, refusal to
 10 grant access to a location. I don't think that's
 11 correct, because I'm aware of at least one and possibly
 12 more examples of where other grounds came into being and
 13 suspension followed.

14 Q. Right.

15 Now, you and Ms Amoroso started at the BBA at more
 16 or less the same time, perhaps about a month apart. Can
 17 you account for why she told us that, in her own
 18 experience and understanding, the only occasion when the
 19 BBA would threaten not to re-issue a certificate is when
 20 the certificate holder denied access to the factory?

21 A. Well, with all due respect to Ms Amoroso, she may not be
 22 aware of what other parts of the BBA was doing, given
 23 there were a number of distinct teams, and there was
 24 generally often no need to share with individual team
 25 members what was happening elsewhere.

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1 So I don't believe she's correct in her assessment
2 and assumption there. I'm aware of other examples which
3 clearly are contrary to what she says.
4 Q. Was it not important for project managers and their
5 immediate line managers at least to have
6 an understanding of what the sanctions were in
7 circumstances where the certificate holder had not
8 answered repeated requests for information relevant to
9 a review?
10 A. Well, I believe it is clear that if you're not getting
11 the information, you escalate it, and there are grounds
12 to suspend if that's not the case. I'm surprised to
13 hear that there was any other understanding operating,
14 if that was the case for Ms Amoroso and indeed her
15 manager.
16 Q. Yes, and really my question is: can you account for why
17 she had the view she did?
18 A. No, I can't.
19 What I can say, just applying my mind to this, is
20 that there would regularly be staff meetings where all
21 the teams were brought together and senior managers
22 would discuss with them what was going on, and I can say
23 that from certainly 2016 onwards, my presentations to
24 staff at the BBA were about intelligence, getting
25 information about anything unethical going on in the

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1 organisation, and about risk, escalating risk and
2 understanding the BBA's position in respect of having
3 information that maybe only we would know about and
4 making sure that was employed and deployed properly to
5 keep the public safe. So that was something I spoke to
6 on a number of occasions during my time at the BBA.
7 Q. Can you account for why there was no or appears to have
8 been no clear guidance or training given to project
9 managers and their immediate line managers about the
10 exact circumstances in which suspension of a certificate
11 would be considered?
12 A. Well, the grounds can be numerous and varied, of course.
13 If there is an issue that's stopping you being able to
14 do your job, escalate it, and, you know, let your
15 managers and others worry about this rather than the
16 individual.
17 So I don't know why there isn't such a policy as you
18 describe, but I'm just trying to think how practical
19 that would be. But I never in my time at the BBA had
20 a sense that people would choose to sit on and suppress
21 risks for themselves rather than escalate it to people
22 more senior.
23 Q. Now, there was a further review of this certificate for
24 Reynobond 55 which began in October 2016, and I just
25 want to ask you about one or two aspects of that review.

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1 Valentina Amoroso told us that she discovered that
2 the cassette—fix variant of Reynobond 55 was not
3 manufactured by Arconic and that, as a consequence, it
4 was treated or to be treated as not covered by the
5 certificate, and eventually that led to its being
6 excluded when the certificate came to be re-issued in
7 August 2017. That's a summary of what she told us about
8 the cassette.
9 On the basis of what I've just summarised to you of
10 her evidence, do you agree that she had identified
11 a material error in the certificate as it has existed
12 since 2008, namely that it covered cassette—fix variant
13 of Reynobond 55 when it shouldn't have done?
14 A. Yes, that's significant.
15 Q. Now, Valentina Amoroso told us that there was no process
16 by which such an error would be communicated to readers
17 of the certificate unless they specifically contacted
18 the BBA and enquired. She said that in her statement at
19 paragraph 86 {BBA00010797/16}, and also at
20 {Day106/111:19–24}. I don't need to take you to that,
21 but is she right about that?
22 A. Yes, there was no direct process for the BBA to
23 communicate with the public or users, and the
24 responsibility would be upon the client to bring that to
25 the attention of those who may be affected by it.

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1 Q. Does that tell us that certificates would or might still
2 be circulating which had errors on it, like this one,
3 and no one would know unless they asked?
4 A. Well, from the BBA's perspective, the BBA would not know
5 where that — who had used it, where it had been used,
6 how it had been used — the certificate, I'm referring
7 to — wouldn't have that information to be able to act
8 upon it, but the client would.
9 But I can tell the Inquiry about one occasion
10 where — literally just two days before the fire, where
11 I did do a major escalation to HM Government of a matter
12 that caused me great concern. So it was possible for
13 the BBA to report to Government if something was very
14 significant and we were aware of it.
15 Q. Can you tell us, as shortly as possible, what that
16 matter was that caused you such great concern?
17 A. Yes. As briefly as I can, in February of 2016 the BBA
18 became aware that insulation on the side of a building,
19 a tall building, had fallen. Nobody was hurt, thank the
20 Lord, but it did raise significant issues, because that
21 was a certificated product.
22 I dispatched a team to go and enquire what had
23 happened, and as a result of what we learned, I mounted
24 something like a 14-month inquiry, because it appeared
25 that the industry was not very aware of windload

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1 calculations, how robust something exposed to severe
2 weather would need to be. That investigation reviewed
3 lots and lots of different certificates and certificate
4 holders, and we presented our report about our findings,
5 because I think it was outwith the BBA's control, and
6 even outwith the client's knowledge as to where this had
7 gone, and we submitted this report to HM Government on
8 about the 12th — I think 12 or 13 June 2017, some
9 14 months after the incident.

10 So the BBA could and would escalate matters if
11 I knew about them.

12 Q. As a result of that investigation — well, was it
13 prompted, first of all, by anything wrong with the
14 certificate in relation to the insulation?

15 A. No, I don't believe it was, because the responsibility
16 within it was upon building professionals to make the
17 right calculations. The issue was that I was not
18 convinced, and my scientific and engineering colleagues
19 weren't convinced, that those skills reposed in the
20 users of the certificate. So on that basis, it was
21 raised.

22 Q. Right. So it wasn't anything about the certificate that
23 started this investigation; it was about the use of the
24 end product? Is that what you're telling us?

25 A. It — to the extent that the certificate — to the

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1 extent that the certificate identified the
2 responsibility with someone else, I wasn't happy that
3 was sufficiently clear, which is why I explored it, and
4 because it was about the end user and we couldn't
5 control that, I escalated that to HM Government.

6 Q. Who at HM Government?

7 A. To the Department for Communities, as it was then, and
8 Local Government. I think the gentleman's name may have
9 been a Mr Harrell.

10 Q. Coming back to this one, can we look at what you said
11 a moment ago on page 16 at line 4. You said the BBA
12 wouldn't know who had used it, where it had been used
13 and how it had been used. But you would be able,
14 wouldn't you, to put something up on your website to say
15 to the world that the Reynobond 55 certificate dated
16 14 January 2008 had a material error in it and no longer
17 should be read as covering cassette? Why couldn't you
18 do that?

19 A. I believe that there was a process whereby certificates
20 which were withdrawn were posted onto the BBA website.
21 I think — I remember seeing — I didn't spend a lot of
22 time with it, but I remember looking at it, that there
23 was a withdrawn certificate page or area on the BBA
24 website.

25 Q. Right.

18

1 Was there a process at the BBA whereby those who
2 might have relied on an inaccurate certificate in the
3 past were told about those inaccuracies?

4 A. The answer is that the BBA wouldn't know who had relied
5 on or seen or used a certificate previously. Therefore,
6 it was difficult — other than to say a certificate had
7 been withdrawn and place it onto the website, as I've
8 just described, I wasn't aware of another process.
9 I can't think of another process that would answer the
10 question that you've just set.

11 Q. Well, why not put on the BBA's website that in relation
12 to the 14 January 2008 certificate for Reynobond 55, it
13 can no longer be relied upon as covering cassette and
14 should never have covered cassette from the start? Why
15 wasn't that something you could put on your website as
16 soon as that was discovered?

17 A. Erm ... well, just — you know, there could be
18 a multitude of reasons why a certificate is withdrawn,
19 you know, going on to how much narrative does one put
20 around these things. But the fact the certificate had
21 been withdrawn was there, and of course anyone can ask:
22 why is that? So I think that was the approach that was
23 taken: report the fact, there could be a load of reasons
24 around it, and then if someone wishes to find out more,
25 to contact the BBA. That's, I believe, the approach

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1 that was adopted.

2 Q. Right.

3 My question is: why wasn't there a process whereby,
4 as soon as Valentina Amoroso decided that the
5 certificate should no longer cover cassette and should
6 never have covered cassette, that that fact wasn't
7 communicated to the world at large on the BBA's website,
8 whether or not the certificate was formally fully
9 withdrawn?

10 A. I can't answer, other than to say — as I've answered
11 before.

12 Q. Now, we've also heard that Valentina Amoroso asked
13 Arconic as part of this 2016/2017 review for technical
14 datasheets, commercial brochures, installation manuals,
15 and CE data. We've also heard that at this point, late
16 2016, the latest fire classification report on the
17 technical file available to her was from 2005.

18 Against that background, my question is: was there
19 a policy or process in place at the BBA at that time,
20 late 2016, whereby project managers should routinely ask
21 for up-to-date classification reports?

22 A. No, I don't believe there was such an instruction or
23 requirement.

24 Q. Why not?

25 A. The process that the BBA operated against was that the

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1 location should be under surveillance and the obligation
 2 on the client to report anything that had changed, which
 3 we've just discussed, and therefore it was a sealed
 4 system, if you will, that if nothing had changed and the
 5 attributes of the product hadn't changed, then the
 6 extant information was sufficient to enable the BBA to
 7 be satisfied that the product was still as it was
 8 intended to be when certificated. That was the concept.
 9 Q. So you were entirely reliant on whether or not there had
 10 been anything that had changed in the manufacturing of
 11 the product, its attributes?
 12 A. Yes. In my opinion, I believe that the BBA was and is
 13 overly reliant on the client providing information to
 14 the BBA.
 15 Q. Hence, would you agree, the critical importance of
 16 seeking and obtaining on every occasion of a review or
 17 re-issue a clear confirmation from the client that
 18 nothing had changed which would undermine the validity
 19 of the certificate?
 20 A. In my opinion, yes, but I don't think the sanctions
 21 available upon a client are sufficient to make sure that
 22 happens.
 23 Q. Now, we know that in November 2016 the BBA offered
 24 a re-issue contract to Arconic, and that was agreed.
 25 I don't need to go to that with you, the reference is

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1 {BBA00008187}. We know that a re-issue process was
 2 taking place when the Grenfell Tower fire occurred on
 3 14 June 2017.
 4 I want to turn to some questions about ADB, before
 5 I ask you questions about what happened after the fire
 6 within the BBA in relation to this certificate.
 7 So, against that background, can I show you
 8 Mr Albon's second witness statement, please. This is
 9 {BBA00010723/36}, paragraph 149. He says at the bottom
 10 of the page, under the question at 37:
 11 "Please explain what steps the BBA took to review
 12 and amend the BBA certificate 08/4510 after the fire and
 13 what precipitated those steps?"
 14 His answer is:
 15 "Earlier in 2017, before the fire, the BBA had
 16 identified what it considered to be an ambiguity in the
 17 wording of section 12.7 Insulation Materials I Products,
 18 of Approved Document B, Volume 2. This section reads
 19 (in part):
 20 "'In a building with a storey 18m or more above
 21 ground level any insulation product, filler material
 22 (not including gasket, sealants, gaskets and similar)
 23 etc used in the external wall construction, should be of
 24 limited combustibility."
 25 If we go down to paragraph 150 {BBA00010723/37}, he

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1 says:
 2 "The issue centred on what would constitute
 3 a 'filler' and in particular whether the polyethylene
 4 materials in ACMs could be so classified. Since the
 5 events at Grenfell fire there has been some debate on
 6 this issue and an opinion has been expressed by an
 7 Expert Witness to the Inquiry, Dr Barbara Lane, that
 8 this is not the case. However, the BBA felt that the
 9 existence of the 'etc' in this section widened the
 10 definition of the materials covered by this requirement
 11 and that it could be concluded that the polyethylene
 12 would be required to be of limited combustibility,
 13 irrespective of whether or not it constituted
 14 a 'filler'."
 15 Then at paragraph 151 he says:
 16 "If this was the case, as the polyethylene was not
 17 of limited combustibility, the product would be
 18 restricted to use on buildings up to 18m in height."
 19 Were you aware of this view that he has described at
 20 the BBA at the time he describes?
 21 A. I can't remember exactly when in 2017, my feeling is it
 22 was linked to the time of the fire or shortly
 23 thereafter, but Mr Albon and others were discussing this
 24 issue about the filler and the "etc" wording. So, yes,
 25 I was aware of the conversation. I can't tie it down to

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1 a specific time, I am afraid.
 2 Q. Right. So are you unable to help us with exactly or
 3 even roughly when the BBA first identified the ambiguity
 4 to which Mr Albon refers in paragraph 149?
 5 A. No, I can't. I've got no reason to doubt the timescale
 6 Mr Albon has suggested as being in the early part of
 7 2017, that may be correct, but I can't offer a personal
 8 view. It was certainly an extant discussion at the time
 9 of the fire, and I sense it may have been going on
 10 before then.
 11 Q. Right.
 12 Was this discussed at a senior level, a managerial
 13 level within the BBA, to your knowledge?
 14 A. It's highly likely. It's a relatively small team. The
 15 CEO is an engineer, and an enthusiastic engineer, and
 16 I feel, yes, it would have been discussed at senior
 17 level.
 18 Q. Right.
 19 Were you yourself involved in any such discussions?
 20 A. I remember it being discussed, whether that was a formal
 21 meeting or being talked about -- I remember it, but
 22 I can't say that I was asked to make a decision or
 23 necessarily give a particular view on it.
 24 Q. Are you able to help us with how the BBA came to the
 25 conclusion identified by Mr Albon in his statement here?

24

1 A. No, I can't. No, I can't help you.
 2 Q. Ms Amoroso told the Inquiry that the conversation or
 3 discussions about this question started at about the
 4 time of the second review, so late 2016. That was
 5 {Day106/166:16} and {Day106/167} (inaudible).
 6 Do you agree with her?
 7 A. I'm sorry, there was an interruption in the transmission
 8 there and I lost probably a third of the sentence,
 9 I think. Would you repeat the question, please?
 10 Q. Yes, certainly.
 11 Ms Amoroso told the Inquiry that the conversation or
 12 discussions about this question started at about the
 13 time of the second review, so late 2016, and I've given
 14 some transcript references.
 15 Do you agree with her?
 16 A. I don't know, as a simple answer. Again, that is
 17 a possible timeframe, but I don't personally know.
 18 Q. Can we look at your evidence yesterday, please, at
 19 {Day107/118:11}. You say:
 20 "Particularly during 2015 and into 2016, I began to
 21 take an interest in intelligence about the industry and
 22 making sure that anything that related to poor practice
 23 in the industry that was coming to our attention was
 24 brought to my attention so that I could decide how best
 25 to deal with it."

25

1 Was this question about the meaning and ambit of
 2 section 12.7 of Approved Document B one of those things
 3 that was brought to your attention as a result of your
 4 interest in intelligence about the industry you told us
 5 about?
 6 A. No, that's not quite what I was referring to yesterday.
 7 The intelligence was about unethical practice or
 8 malpractice that was taking place in the industry, not
 9 legitimate debates about the meaning of the approved
 10 documents.
 11 I think there has been an almost near constant
 12 discussion about whether the Building Regulations and
 13 the approved documents are sufficiently clear. I think
 14 scientists and engineers who live and breathe this stuff
 15 talk about it a great deal. So I don't — that is not
 16 what I was referring to in line 11 of my yesterday's
 17 evidence.
 18 Q. Valentina Amoroso told us that the BBA had tried to
 19 reach out to the Government on this question but without
 20 much luck. Is that something you remember?
 21 A. No, I don't. I can't say that I can remember that.
 22 Q. Now, I want to ask you about the aftermath of the
 23 Grenfell Tower fire, the immediate aftermath, in the
 24 June and the July of 2017.
 25 Can I start, please, by taking you back to your

26

1 witness statement at page 2 {BBA00000159/2}. You say in
 2 paragraph 4:
 3 "I was in post on 14th June 2017 when the fire at
 4 Grenfell Tower occurred. In the aftermath, the BBA was
 5 trying to establish what had happened but, in my
 6 opinion, there was an information 'vacuum' and the BBA
 7 sought to piece together a picture from media reports
 8 and other sources. We believed that 'Reynobond PE' was
 9 involved. Reynobond PE is Certificated by the BBA."
 10 Can you explain what you mean there by
 11 an "information vacuum"?
 12 A. Yes. There was a mass of information swirling around.
 13 The media was full of reports, people who may or may not
 14 have been experts on the television talking about what
 15 had happened and what was involved, newspaper reports,
 16 social media — there was a maelstrom. But in the
 17 middle, you know, clear facts from an authoritative and
 18 objective source I thought was lacking. I didn't know
 19 what had happened, and it was some time after it before
 20 I had a sense of what did actually happen.
 21 So we, like everyone else, were trying to understand
 22 what had gone on. So that's what I mean by a vacuum,
 23 but also a lot of other information flying around. It
 24 was difficult to understand what the position was.
 25 Q. Was there an internal investigation at the BBA in

27

1 respect of this certificate at this time?
 2 A. An internal investigation? To the extent of
 3 understanding what had gone on and what was
 4 certificated, yes. Yes.
 5 Q. Who led that investigation?
 6 A. I would say that was me.
 7 Q. When did that start?
 8 A. Again, it depends what you mean by an investigation.
 9 Can you just explain what you mean by internal
 10 investigation?
 11 Q. Well, you have said that it was an information vacuum
 12 and nothing at the middle of it, this is maelstrom.
 13 I asked you whether there was an internal investigation
 14 in respect of the certificate, and you said to the
 15 extent of understanding what had gone on, yes.
 16 So you tell me: what steps did you take to
 17 investigate the BBA's role in certifying the product
 18 that you rightly thought was on the outside of
 19 Grenfell Tower?
 20 A. Well, I've set out in this witness statement the steps
 21 I took to establish what had happened in terms of what
 22 was on the building and who knew what and when.
 23 Can I just say and make it very clear that the
 24 purpose of this witness statement was to alert
 25 the Inquiry in 2018, November, that Dr Lane, who was

28

1 about to give evidence to the Inquiry, may not have had
2 the information she needed. So this statement set out
3 what I did and what I knew about in terms of what had
4 gone on around what was on the building and the steps
5 that the BBA took.

6 So this document, in effect, reprises what I was
7 doing to investigate what had gone on at the building.

8 Q. Right.

9 When you started your investigation, as you have
10 described it thus far, were you responding to a request
11 from more senior management at the BBA?

12 A. Well, with respect, I think the use of the word
13 "investigation" was yours. I will agree it to
14 an extent, but perhaps not as far as you intend it to
15 mean.

16 At the BBA — well, yes, the chief executive,
17 of course, was fully aware, as were the governing board,
18 and, yes, I just put myself in the position of leading
19 on behalf of the BBA here.

20 Q. Can we look at {BBA00010485/2}, please. Now, this is
21 an email from you of 20 June, the second email in the
22 string, 9.38. This is from you on 20 June 2017 at 9.38
23 to a variety of people. It starts, "Dear Board
24 Members".

25 Do I take it from the introduction there that the

29

1 people to whom you were sending this email were members
2 of the BBA board?

3 A. Yes.

4 Q. "Please find appended a note regarding the fatal fire at
5 Grenfell Tower. This is our current understanding based
6 on media reports.

7 "In summary, we are in a reasonable position.

8 "If the cladding 'system' (i.e. the combination of
9 cladding and insulation is as described in the media,
10 then the system is not Certificated by the BBA.

11 "The insulation itself is not Certificated by the
12 BBA.

13 "The cladding itself is. The Certificate is 2008
14 vintage and was in the process of being Reviewed and
15 Reissued just before the fire. We would be in
16 a stronger position if it stated in terms 'not to be
17 used above 18m' but, as the note makes clear, the
18 Certificate holder/user must comply with building regs.

19 "We had not conducted any cladding—related
20 inspections at building."

21 Now, by "2008 vintage" there, what were you
22 indicating?

23 A. That the certificate was probably eight years — well,
24 it would have been nine years old at the time when the
25 cladding, et cetera — the building had been

30

1 refurbished, and was being reviewed — well, as it says
2 there, was being reviewed and re—issued before the fire.

3 It did not specify not to be used above 18 metres,
4 just as the note says. The certificate holder, however,
5 must comply with Building Regulations.

6 Q. Yes, sorry, you have gone slightly off the point.

7 A. Sorry.

8 Q. I was just asking you about the vintage.

9 Did the fact that you were using the expression
10 "2008 vintage" indicate, or was it intended to indicate,
11 that this certificate was old and should perhaps have
12 been re—issued since 2008?

13 A. Yes, I think that is what I was saying, "vintage"
14 generally means that. It was an older certificate,
15 that's for sure.

16 Q. Yes. You say, as you see here, and you have pointed
17 out, you would be in a stronger position if it stated in
18 terms, "not to be used above 18 metres". Was it your
19 view at the time that the certificate should have said
20 that?

21 A. Well, I think as you alluded to earlier, sir, that
22 the ... sorry, I've lost my point ... that Approved
23 Document B and fillers, et cetera, were putting — were
24 causing the BBA to reconsider whether cladding with a PE
25 core could be used above 18 metres. So to that extent,

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1 it was relevant to the BBA's thinking at the time.

2 Forgive me, it may help if you just repeat your
3 question, please.

4 Q. Yes, my question was: was it your view at the time that
5 the certificate ought to have been restricted to use
6 below 18 metres?

7 A. It would have been — well, it would have been clearer
8 if it specified that in absolute terms, but back to the
9 base upon which doing that, because Approved Document B
10 I think at that stage still permitted B and class 0
11 above 18 metres.

12 Q. Well, indeed, and that was my next question: was there
13 anything that remotely suggested, on the face of this
14 certificate, that Reynobond 55 should not be used above
15 18 metres?

16 A. As I say, to your point earlier that there was
17 discussion going on within the BBA about limiting the —
18 limiting what we would certificate, ie to 18 metres, if
19 the core was a filler and was potentially, therefore,
20 not combustible or of limited combustibility. So it was
21 that point which we discussed earlier, I believe. But,
22 again, I don't remember seeing that email until just
23 presented, so forgive me if I'm trying to recall as I'm
24 reading.

25 Q. We can see the note that was attached to your email of

32

1 20 June that we've just looked at. The note is at
 2 {BBA00010486}. I think, in the light of the answers you
 3 have given so far, I can take this document quite
 4 quickly, but let's just look at it, because it's
 5 a document with your name on it.
 6 It starts:
 7 "BBA position on Grenfell Tower (as of
 8 20th June 2017)."
 9 If we go to page 5 of that document {BBA00010486/5},
 10 please, you can see your name at the bottom, together
 11 with John Albon and Jorden Adams'.
 12 Did you co-author this document?
 13 A. I think probably the document came to me and I put,
 14 I think, any board-related comments about it. So, yes,
 15 I've added my name, so I am taking responsibility for
 16 the document.
 17 Q. I see.
 18 Can we go to paragraphs 16, 17 and 18 on page 3
 19 {BBA00010486/3}. You can see that those paragraphs
 20 there, 16 to 18, deal with technical matters about
 21 Approved Document B. Do you see that? Paragraph 17
 22 refers to diagram 40; paragraph 18 refers to
 23 section 12.7 of Approved Document B; and paragraph 19
 24 refers to appendix A and the meaning of "limited
 25 combustibility".

33

1 Were those passages that I'm showing you there
 2 passages in this note that you wrote or were they
 3 written by the other signatories?
 4 A. I would have deferred to Mr Albon on this, so I did not
 5 write that section.
 6 Q. I see.
 7 A. I can't see all of 19, but I don't believe I would have
 8 authored that as well.
 9 Q. I see. So we can ask Mr Albon about that, can we?
 10 I mean, would Mr Albon be the better person to ask about
 11 the details of these paragraphs?
 12 A. Yes.
 13 Q. Yes.
 14 Then we can move on to your discussions with Arconic
 15 in the June of 2017, after the fire.
 16 Can we start with {BBA00010769/6}, please. This is
 17 Simon Wroe's email to Nicolas Remy at Arconic, copied to
 18 Claude Wehrle, Valentina Amoroso and you. It's two days
 19 or so after the fire at the Grenfell Tower. You can see
 20 there that, in the second part of the email, halfway
 21 down your screen, he says:
 22 "If possible we would be grateful if you could
 23 confirm that Arconic Architectural Products s.a.s:
 24 "■ supplied Reynobond cladding panels to either of
 25 the above companies for this contract?"

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1 "and if so were the panels:
 2 "■ standard or FR grade?
 3 "■ polyester or PVDF coated?
 4 "■ in flat or cassette form?
 5 "Thank you in advance for your help."
 6 Now, we've seen no response from Arconic to this
 7 email in our records, Mr Moore. Do you know whether one
 8 was received?
 9 A. To the best of my knowledge and belief, no response was
 10 received to this email.
 11 Q. Do you know why a response was not chased up?
 12 A. A response was chased up. Colleagues Mr Wroe and
 13 Ms Amoroso were, to my knowledge, calling Arconic, their
 14 contacts there, probably over a two-week period.
 15 Q. We certainly see some correspondence in July, but I'm
 16 not sure we've seen a prompt email from Simon Wroe to
 17 Nicolas Remy or Claude Wehrle saying, "Please can you
 18 respond to my email below", we haven't seen something
 19 like that. Do you know why that was?
 20 A. Well, the staff members were chasing — were chasing,
 21 I use that word. We were very keen to get information.
 22 I would imagine that the people at the other end were
 23 very, very busy. Whether they would be responding to
 24 emails or not from the BBA, clearly not. But we did
 25 have telephone — we did have named people and telephone

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1 numbers, so there was work going on to try to telephone
 2 them as well during this period, to my knowledge.
 3 Q. Let's move into July 2017. Can we look, please, at
 4 {MET00053158_P18/174}. Here we see the second email
 5 down, I think, from Hannah Willis at BBA to Nicolas Remy
 6 on 4 July 2017:
 7 "Dear Mr Remy,
 8 "On behalf of the BBA Operations Director,
 9 Brian Moore, please find attached a letter relating to
 10 the Grenfell Tower fire."
 11 Do you see that?
 12 A. Yes.
 13 Q. The letter itself is at page 181 {MET00053158_P18/181},
 14 a little bit lower down this exhibit run, if we can just
 15 go to that, please. Here is the letter from you, as you
 16 can see at the bottom of the screen, addressed to
 17 Mr Remy at Merxheim:
 18 "Dear Mr Remy,
 19 "Grenfell Tower Fire."
 20 In the second paragraph, you — well, the first
 21 paragraph, actually, I should just show you. You say:
 22 "Further to my letter of 26th June 2017, I write
 23 enclosing a copy of a letter we sent to over 600 local
 24 authorities and housing associations on Friday
 25 30th June 2017."

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1 I'll come to that in a moment.
 2 You say in your second paragraph:
 3 "The background to this is that we have been
 4 receiving enquiries from local authorities and housing
 5 associations asking for information regarding the role
 6 of certificates, in particular relating to the fire
 7 performance of aluminium composite cladding materials.
 8 We wrote to try to help staff in these organisations
 9 understand how to use and 'navigate' BBA Certificates."
 10 I'll stop there.
 11 Can we look at the letter to which you're referring
 12 in the first paragraph. This is at page 175 of the same
 13 exhibit run {MET00053158_P18/175}, if we can go back to
 14 that.
 15 If you look at the next page {MET00053158_P18/176},
 16 we can see the actual letter. It starts, "To all Local
 17 Authorities and Housing Associations", and there is a,
 18 "Dear [blank]":
 19 "Aluminium composite cladding — understanding the
 20 role of BBA Certificates."
 21 It then proceeds.
 22 I'm showing you the first page there. Were you
 23 involved in the drafting of this document?
 24 A. Probably not. If there's a significant technical
 25 element to it, then it would have been drafted on my

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1 behalf, yes.
 2 Q. Let's just look at a separate document to see if we can
 3 explore that a little bit further.
 4 Can we go, please, to {BBA00010354}. This is
 5 an email at the bottom of the page to you, I think, from
 6 Liz Male:
 7 "Dear Brian,
 8 "Sorry for such a late response this evening.
 9 Well done on pulling together this draft.
 10 "Writing to LAs/HAs is definitely the right thing to
 11 do, for all the reasons you state below, and because it
 12 also supports the BBA's ongoing efforts to create
 13 dialogue, build brand awareness and prompt closer
 14 relationships with social landlords (for the longer-term
 15 benefit of CASS, CIT etc)."
 16 Then she says she has made quite a few suggestions
 17 to the text of the letter.
 18 If we go up the screen a little bit, we can see that
 19 you are copied in on an email from Claire Curtis—Thomas
 20 to Liz Male in response:
 21 "Liz, very good.
 22 "John re the point about building control — is there
 23 any role here for competent person self certification
 24 which would diminish the input of the building control?"
 25 You're copied in on that, as is John Albon, and

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1 clearly that question is addressed to him.
 2 It looks from that as if you were involved yourself
 3 in the drafting of this document; is that right?
 4 A. Sorry, which document, the Q&A document?
 5 Q. Yes, the Q&A document, the letter that was sent to 600
 6 local authorities and housing associations.
 7 A. Again, I don't remember this, until you've just shown it
 8 to me. I haven't read the document, so it's difficult
 9 for me to comment. What I would say is if it contains
 10 significant technical information, then it's unlikely
 11 I would be drafting it.
 12 Q. Well, this document — let's go back to it, shall we,
 13 it's page 176 {MET00053158_P18/176}. Is this the
 14 document that you would refer to as the FAQ document?
 15 A. No, I saw a Q and I saw A, so that's the document —
 16 I was referring to this document, yes.
 17 Q. Let's stick with it for a moment. Can we go to page 177
 18 {MET00053158_P18/177}, and a question there is:
 19 "What does Approved Document B say about cladding on
 20 high rise buildings, and what fire tests are carried
 21 out?"
 22 The first few paragraphs under that heading set out
 23 the requirements in Approved Document B and also
 24 requirement B4 on external fire spread, as you can see,
 25 and at the bottom of the page, it says:

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1 "As a consequence of the testing carried out, the
 2 Reynobond cladding product used at Grenfell Tower was
 3 deemed to achieve a Class 0 rating."
 4 Did you play any part in drafting that sentence?
 5 A. I don't believe so. Again, looking at — it's quite
 6 a — I would not claim that my knowledge of Approved
 7 Document B and its appendices, et cetera, is
 8 sufficiently adequate that I would like to draft
 9 a document going out to 600 local authorities. So
 10 I don't believe I was involved in that, to the best of
 11 my knowledge and belief.
 12 Q. Do you know who was?
 13 A. It would be those with the best knowledge at the BBA
 14 around this. Possibly Mr Albon, possibly Mr Denyer, the
 15 principal scientist, or the chief engineer. But, again,
 16 I am not sure. I don't wish to mislead the Inquiry.
 17 I'm not certain.
 18 Q. I don't think we've seen Jon Denyer copied in on the
 19 email chain internally which attaches this document, so
 20 do you know who drafted the sentence I've just shown
 21 you, or can you not help us?
 22 A. I can't help you, I don't know.
 23 Q. Are you able to tell us what the words "was deemed to
 24 achieve Class 0 rating" was there?
 25 A. Sorry, you broke up slightly, the last part of your

40

1 question. Could you repeat the question, please?

2 Q. Are you able to tell us what the words "was deemed to

3 achieve class 0 rating" means?

4 A. No, I can't.

5 Q. Do you agree as a fact that Reynobond PE had not been

6 tested in accordance with BS 476—6 and 7, nor indeed

7 BS 476—11 for limited combustibility?

8 A. I believe that is correct.

9 Q. Did you know that at the time this letter was drafted

10 and sent out?

11 A. Erm ... it's difficult to say. I don't know exactly

12 when I would have known about this document in relation

13 to that discussion.

14 What I can say is that expression looks familiar,

15 "was deemed to achieve a Class 0 rating". I don't know

16 where it's from, but I believe I've seen that expression

17 used before, so whether it was something extracted from

18 another document ...

19 I also think it's about this — the class 0 and

20 the Euroclass are different, but they can be used to

21 satisfy the requirements of the approved document.

22 So I think I've seen that wording before, but

23 I can't say exactly where, and I think it's about trying

24 to suggest they're equivalent, but of course they're

25 not.

41

1 Q. Of course, as we've seen, and we may need to go back to

2 it if necessary, but the BBA certificate issued in

3 January 2008 said that the product "may be regarded as

4 having Class 0". Given that you were at least passingly

5 familiar with the certificate, does that help you with

6 your recollection of the origin of that expression,

7 "deemed to achieve a Class 0 rating"?

8 A. Well, it's not exactly the same, is it? But it's

9 a similar theme about whether these things are

10 equivalent. But that expression does seem — did seem

11 familiar, and I don't think it's that allusion that

12 you've just made.

13 Q. Can we have the document back on the screen, please

14 {MET00053158_P18/117}.

15 Do you agree — just look at them again — that

16 those words might lead the reader of this letter to

17 think that Reynobond 55 PE had actually achieved

18 class 0?

19 (Pause)

20 A. Well, if one reads the paragraph immediately above it,

21 and which I hadn't read a moment ago, I think that sets

22 the context for it. Let me just read that again:

23 "These two rating systems are based on different

24 tests, which are not interchangeable, but the

25 Regulations accept the use of either system. To achieve

42

1 these ratings, the whole cladding panel is fire tested.

2 "As a consequence of the testing carried out, the

3 Reynobond cladding product used at Grenfell ... was

4 deemed to achieve a Class 0 rating."

5 It's possible, it depends if — it depends whether

6 the reader of this document — local authorities would

7 have building specifiers and engineers and others

8 engaged in this, I hope it would make sense to the

9 informed reader. But there is something about the

10 paragraph above which I think sets the context a little.

11 Q. Do you know when the BBA first became aware that

12 Reynobond PE 55 had not achieved class 0?

13 A. I would say the only realistic time that I was sure —

14 I was sure, not suspicious, but sure — was probably

15 Dr Lane's evidence and report, which I think was in

16 October 2018.

17 Q. Now, I'm going to come back to the correspondence that

18 you had with Arconic shortly.

19 Before we do that, can I look first, please, with

20 you at {BBA00010152}. This is about the UKAS visit that

21 took place in July 2017. It's an email chain between

22 you and Claire Curtis—Thomas relating to that visit.

23 If we go to the third email down, which I think you

24 will find on page 2 of this exhibit {BBA00010152/2}, you

25 will see there that there is an email from you to

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1 Claire Curtis—Thomas at 10.40, and you say, "Claire A".

2 Do you see that? Do you see the document?

3 A. Yes.

4 Q. "At this morning's co—ordination forum, we recommended

5 that a message is placed on the intranet accurately but

6 positively describing yesterday's visit by UKAS.

7 "Our reasons are ..."

8 Then you can see the reasons set out. The second

9 one:

10 "We have at least one member of staff who has

11 vigorously challenged our position/handling."

12 Then the third bullet point:

13 "One newspaper contacted us about an employee

14 whistleblower."

15 What was the nature of the challenge by the member

16 of staff referred to?

17 A. I think we touched on this yesterday, sir. As I said

18 yesterday, I can't remember exactly what the nature of

19 the challenge was, other than he was very exercised

20 about this, and I was concerned that, following that, we

21 knew that an employee had contacted a newspaper, so

22 I assumed it was the same person.

23 As per yesterday, I can't remember exactly what it

24 was about. It was quite soon after the fire, and

25 therefore it must relate to the fire, but I don't

44

1 know — I don't think I was ever so closely involved in
 2 it that I knew the detail of what he was so anxious
 3 about.
 4 Q. Yes, and you did mention this yesterday at
 5 {Day107/148:2}, no need to go back to what you said.
 6 Let's go to a document and see if this helps your
 7 recollection. Can we please go to {BBA00009596}. You
 8 can see that this is an email from Richard Beale to you
 9 and John Albon and Simon Wroe on 6 July 2017, and it
 10 starts:
 11 "One of our employees has raised some concerns
 12 relating to FAQs regarding Grenfell Tower. I would like
 13 the team to look at the detail and offer a response
 14 against each of the points raised for me to directly
 15 liaise with the employee.
 16 "Points Raised ..."
 17 And you can see there are three:
 18 "1. Certificate is subject to regular 3 yearly
 19 reviews is correct, but misleading.
 20 "a. Reissues that should have been carried out have
 21 not been undertaken, so certificate is out of date, i.e.
 22 certificate refers to building regulations and NHBC
 23 regulations which are out of date, and does not refer in
 24 any way to updated regulations.
 25 "2. No significant regulatory change which leads to

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1 certificate change, (false).
 2 "a. There have been a number of regulatory changes
 3 since 2008, which would have led to a change in the
 4 [certificate] being updated and changed. E.g. Following
 5 review of report S1/53729 in 2014 in which BBA sent
 6 report and contract which highlights regulatory changes.
 7 The contract was not followed up and thus certificate
 8 was not updated. Web statement gives the impression
 9 that the certificate is up to date.
 10 "3. Statement referring to the fact that BBA
 11 certify reynobond product as fit for purpose on high
 12 rise building as per manufacturers definitions.
 13 "a. BBA certifies that the product can be used in
 14 high rise applications. BBA choose to use building
 15 regulations as applicable fire standards despite high
 16 profile failures of related products in areas of fire
 17 safety, in particular Alibond. FAQ statement implies
 18 that BBA must use building regulations for
 19 certification, this is incorrect because BBA choose the
 20 standards that BBA wish to apply certification [to].
 21 — BBA is an independent body not bound by government
 22 regulations in any area. BBA adopted these regulations
 23 despite concerns from industry about the appropriateness
 24 of the regulations. In essence statement is
 25 inaccurate."

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1 Were these the complaints about the BBA's handling
 2 of the situation after the Grenfell Tower fire made by
 3 the employee who you believed contacted UKAS and the
 4 press?
 5 A. Yes, I believe that is the case.
 6 Q. Now, you said yesterday that you didn't remember the
 7 specifics of the complaint. It seems to be that the
 8 complaint was in fact about the FAQs, in respect of
 9 which you had a hand in the drafting; is that right?
 10 A. The FAQs referred to just now?
 11 Q. Yes.
 12 (Pause)
 13 A. Well ... sorry, could you just tell me your question,
 14 please? Sorry, I was reading the document again,
 15 forgive me.
 16 Q. Yes, of course.
 17 Do you accept that the complaint that was made by
 18 the employee identified by this email was about the FAQs
 19 contained in the letter to the 600 local authorities and
 20 housing associations which you had a hand in drafting?
 21 A. I'm not sure, because there were some other FAQs which
 22 were on the website. So I think the FAQs you just
 23 referred to were specifically to local authorities, who
 24 of course had high-rise blocks, et cetera, for
 25 a specific audience, but I think there were some other

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1 FAQs on the BBA website, because of course there was
 2 lots of contact from other people coming to the BBA, and
 3 it was hoped that the FAQs would help them and also
 4 save, you know, resources at the BBA.
 5 So I'm not sure whether this relates to the FAQs to
 6 the local authority or to any other FAQs that were on
 7 the website.
 8 Q. Do you agree — let's assume for the moment that these
 9 were the FAQs on the website, and let's assume that the
 10 statements referred to are correct — that the FAQs were
 11 misleading for the reasons set out in this email?
 12 A. Of course, at this time, the date of that is 6 July, the
 13 4 August certificate for Reynobond was almost certainly
 14 in its final approved draft stage and about to be
 15 published, which I think dealt with many of the issues
 16 you describe there.
 17 Q. That's not quite an answer to my question, Mr Moore.
 18 I'll ask it again: do you agree, on the basis of this
 19 email, that the FAQs on the website were misleading?
 20 A. No, I can't readily agree with that. Which FAQs are you
 21 referring to, and are they ones that I've seen — are
 22 they the ones that you showed to me earlier?
 23 Q. Well, okay, let's just take this a little more
 24 granularly then.
 25 Item 1:

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1 "Certificate is subject to regular 3 yearly reviews
 2 is correct, but misleading."
 3 Then Mr Beale has put in underneath why, in his
 4 view, it is misleading. He says:
 5 "Reissues that should have been carried out have not
 6 been undertaken, so certificate is out of date ..."
 7 Now, is he right about that?
 8 A. No, sir, because at this time the certificate — at this
 9 time, the certificate for Reynobond, if that's what
 10 we're talking about, is actually being updated and made
 11 correct.
 12 "Reissues that should have been carried out have not
 13 been undertaken, so certificate is out of date."
 14 I'm not necessarily sure I agree with that.
 15 Q. Well, you may not have known this, but as a fact, the
 16 certificate wasn't re-issued until 4 August 2017, so had
 17 not been re-issued.
 18 A. Okay.
 19 Q. It would be right, wouldn't it, to say that in saying
 20 that the certificate is subject to regular three-yearly
 21 reviews is correct, that is right, but it was misleading
 22 because re-issues that should have been carried out
 23 haven't been undertaken so the certificate is out of
 24 date? Do you accept that?
 25 A. Well, if what you've just said is correct, then yes.

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1 I'm sure what you've said is correct.
 2 Q. Just on that, then, can you explain why the BBA's
 3 website contained misleading statements?
 4 A. Well, for the reason I've just explained. At this time,
 5 the 4 August draft is — it must have been at final
 6 approved draft stage, it's been agreed by the client,
 7 and I don't think the FAQs went into any granular
 8 details, it's describing the process.
 9 Again, I've just seen this document a couple of
 10 minutes ago, so forgive me if I don't have all the
 11 detail in it in my hand, I'm talking about the
 12 impression it creates for me. I don't think it went
 13 into great granular detail; it was intended to explain
 14 the process, I believe, and help people understand —
 15 navigate the certification process. I think it's
 16 actually written somewhere.
 17 SIR MARTIN MOORE-BICK: Mr Millett, I'm not sure we've
 18 actually established that the information on the website
 19 was as you're suggesting. The impression I have —
 20 I haven't checked the transcript — is that you invited
 21 Mr Moore to assume that this was correct.
 22 MR MILLETT: That is the basis on which we're proceeding.
 23 SIR MARTIN MOORE-BICK: Well, of course, if we assume it's
 24 correct, then it's correct. But his point is that it
 25 may — well, my question is: is it fair to put to him

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1 that the information on the website was incorrect if we
 2 don't know what was actually there?
 3 MR MILLETT: There it is, Mr Chairman.
 4 It's probably a convenient moment for a break.
 5 I will review what other questions I have on this
 6 document and maybe we can take them —
 7 SIR MARTIN MOORE-BICK: All right, you have a look at that
 8 over the break, but it seemed to me that the questions
 9 were in danger of becoming circular because we were
 10 assuming the answer to the question.
 11 MR MILLETT: Yes. I think the premise of my original
 12 question was that the document we had looked at with him
 13 was the FAQs, but clearly if that's not right, then we
 14 can move on, perhaps. I will have a look over the
 15 break. This may be a convenient moment.
 16 SIR MARTIN MOORE-BICK: Yes, I'm sorry to have interrupted
 17 you, but since I have, this probably is a good point.
 18 So we will take the break now, Mr Moore. We will
 19 come back at 11.40, please, and as I said to you
 20 yesterday, please remember not to speak to anyone about
 21 your evidence or anything relating to it over the break.
 22 THE WITNESS: I understand.
 23 SIR MARTIN MOORE-BICK: Thank you very much.
 24 11.40, then, please.
 25 (11.23 am)

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1 (A short break)
 2 (11.40 am)
 3 SIR MARTIN MOORE-BICK: Welcome back, everyone. We're going
 4 to continue now hearing evidence from Mr Moore. I'm
 5 just going to check that the communications have been
 6 established again.
 7 Hello, Mr Moore, are you there?
 8 THE WITNESS: Yes, Mr Chairman, I am.
 9 SIR MARTIN MOORE-BICK: And you can see me and hear me,
 10 I hope?
 11 THE WITNESS: I can see you and hear you clearly.
 12 SIR MARTIN MOORE-BICK: Thank you very much. And ready to
 13 go on then, I hope?
 14 THE WITNESS: Yes.
 15 SIR MARTIN MOORE-BICK: Right, thank you. Then I shall
 16 invite Mr Millett to put some more questions to you.
 17 Yes, Mr Millett.
 18 MR MILLETT: Thank you, Mr Chairman.
 19 Mr Moore, I would like to ask you now about the
 20 topic of the suspension of the Reynobond certificate
 21 after the fire in July 2017.
 22 Can we go to {BBA00010428}. Now, this is an email
 23 from Claire Curtis—Thomas to you, on 10 July 2017 at
 24 7.53, also to John Albon and Simon Wroe, subject:
 25 "Reynobond suggested Q and A", attachments: "reynobond

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1 suspension questions.docx", and the text says:
 2 "My apologies if you have already received this —
 3 I am in double email world and I wanted to make sure."
 4 Let's look at the attachment. It's at
 5 {BBA00010429}.
 6 Now, this is a Q&A, as you can see, and it starts
 7 with the first question:
 8 "Why has the BBA suspended the Reynobond
 9 Certificate?"
 10 Do you know who the intended audience was for this
 11 document?
 12 (Pause)
 13 A. I'm not sure. I would imagine this would be outward
 14 facing, so to people outside the BBA, but I'm not
 15 certain. There was a lot happening at this time. But
 16 I suspect it was what would be our position if we
 17 suspended the Reynobond certificate.
 18 Q. I see. So the public? Anyone who asked? Anyone who
 19 was interested from outside the BBA?
 20 A. Yes, yeah.
 21 Q. Let's look at the first Q&A:
 22 "Q. Why has the BBA suspended the Reynobond
 23 Certificate?
 24 "A. We have been attempting to contact the
 25 Certificate holder since the Grenfell Tower Fire to

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1 establish certain facts. We provided a date by which we
 2 expected a response and that date has passed. In the
 3 absence of receiving the information we require the BBA
 4 believes that it is necessary and proportionate to
 5 suspend this Certificate."
 6 Let's go down also to the third question relating to
 7 the implications of suspension, which says:
 8 "What are the implications of the Reynobond
 9 Certificate being suspended?"
 10 Then if you go down to the answer, it says:
 11 "It means that the manufacturer cannot claim that
 12 this product is certificated by the BBA. Further that
 13 building and construction—product professionals (such
 14 architects and designers) will not have the independent
 15 assurance afforded by the BBA's certification as to the
 16 product's performance. However, suspension of the
 17 Reynobond Certificate does not mean that all previous
 18 installations of the Reynobond product are 'at risk',
 19 provided that previous installations were executed in
 20 accordance with the requirements of the Certificate and
 21 undertaken by a suitably qualified and experienced
 22 person."
 23 Do you agree, just looking at that, that in fact
 24 previous installations would be at risk if the claims
 25 regarding fire performance made in the certificate were

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1 not accurate and had never been accurate?
 2 A. Yes, I would agree with you.
 3 Q. And similarly if statements in the certificate relating
 4 to building certification were out of date?
 5 A. Sorry, say that question again, please, I'm sorry.
 6 Q. I'll try it differently.
 7 Would you agree that in fact installations would be
 8 at risk if statements made in the certificate about
 9 compliance with the Building Regulations had become out
 10 of date or wrong?
 11 A. If they were out of date, possibly less so, but
 12 certainly if they were wrong as a result of any changes
 13 to Building Regulations, that — yes, I would agree with
 14 you.
 15 Q. Yes. So would you also agree that executing
 16 installations in accordance with the requirements of the
 17 certificate, where that certificate overstated the
 18 product's fire performance or misstated the product's
 19 fire performance, would be no guarantee at all that the
 20 installation was safe?
 21 A. Yes, that follows, yes.
 22 Q. At this stage, is it right that you hadn't yet got to
 23 the bottom of the accuracy of the claims made in the
 24 BBA certificate relating to compliance with the
 25 Building Regulations so far as regards fire performance?

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1 A. I'm not sure I understand what you mean. "Had got to
 2 the bottom of", what do you mean?
 3 Q. Is it right that at this stage the BBA had not completed
 4 its investigations so as to satisfy itself that the
 5 claims made in the certificate for fire performance of
 6 Reynobond 55 PE were correct?
 7 A. That is correct.
 8 Q. So if that is correct, why are you making the statement
 9 that we see in the second half of the answer that I've
 10 just read to you?
 11 A. Well, I don't know the provenance of this document at
 12 all, I can't remember seeing it before, but I'm sure —
 13 it's just been produced before me. I don't think it was
 14 ever used, and I'm just not sure why and how it's been
 15 constructed, what the purpose of it is.
 16 Clearly at this stage, as we discussed earlier, the
 17 BBA was trying to make contact with Reynobond to
 18 establish the position, and yeah, suspension was likely
 19 to follow if there was no follow-up.
 20 But beyond that, I don't know who has written these
 21 responses and whether they were fully sighted on all the
 22 facts and circumstances. I don't believe this document
 23 was ever employed or deployed to anybody.
 24 Q. We can see that you saw it at the time, because I took
 25 you to the email. Can we take it that you did see it at

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1 the time?

2 A. Well, yes, if it's copied to me. Whether I examined it

3 or not in detail, I don't know. This does not seem to

4 be a document that featured in anything subsequently.

5 Q. Right.

6 Perhaps you can help me with this: can you explain

7 why the BBA was preparing to give assurances such as we

8 see in the second half of that answer without yet having

9 heard anything from Arconic or investigated the fire

10 performance statement on the certificate?

11 A. Well, again, I think if there is a timeline, we'd see

12 where this fitted into contact with Arconic. It would

13 be not unreasonable to project ahead, but this document

14 is not authoritative at all, and I'm sure there was

15 various pieces of thinking going on at the time. It was

16 a very busy time, and I certainly don't — I took no

17 regard to this document at the time, certainly

18 subsequently. It hasn't influenced me as far as I can

19 tell in any way. So I don't really recall it. It

20 wasn't significant.

21 Q. Were you still the operations director at this time or

22 had you yet become a deputy CEO?

23 A. On the 10th — what was the date? If the date was on or

24 about 10 July, no, I was the ops director.

25 Q. In that capacity, were you not interested in

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1 understanding exactly what it was that the BBA was going

2 to tell the public about the suspension of the

3 BBA certificate?

4 A. Yes, of course.

5 Q. Yes, and —

6 A. There wouldn't be a suspension of a certificate in these

7 circumstances without me being closely involved and

8 making sure everything was correct.

9 This seems to have come from Claire Curtis—Thomas,

10 if I'm right, and Claire was not very, very closely

11 involved in this. So her understanding and knowledge of

12 the detail, with all due respect to her, was not very

13 precise at that time.

14 Q. And no doubt, as a conscientious operations director,

15 you would have wanted to make sure that whatever was

16 going to be said to the public by way of explanation of

17 the suspension of the BBA certificate was entirely

18 accurate and correct; is that right?

19 A. To the best of my ability, the BBA would not mislead the

20 public or indeed anybody, and I wouldn't allow anything

21 to go out to the public realm if I could that would lead

22 to that outcome.

23 Q. Yes.

24 A. So I don't think this document was significant.

25 Q. Well, did you think at the time when you received it, on

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1 the morning of 10 July 2017, that it was

2 an insignificant document that didn't warrant your

3 attention?

4 A. Well, it's difficult to say, I can't actually recall

5 reading it. What — are there messages either side of

6 it? Is there any indication as to what happened to it?

7 I literally do not recall this, so that's why I don't

8 feel great weight was attached to it by me or anyone

9 else.

10 Q. Well, let me just try the question again: can you

11 explain why the BBA, on the face of this document, was

12 preparing to give assurances like this without, as at

13 10 July, having heard back in full from Arconic in

14 response to the BBA's questions or investigated the

15 truth of the claims about fire performance made in the

16 certificate?

17 A. No, I can't explain why that would be, other than if it

18 was written by Claire Curtis—Thomas, she wasn't blessed

19 with all of the facts, and the sentence, "However,

20 suspension of the Reynobond Certificate does not mean

21 that all previous installations of the Reynobond product

22 are 'at risk' provided that previous installations" —

23 again, at this stage, I didn't know what was on that

24 building, and whether — personally, I didn't know what

25 was on there and whether that statement was correct or

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1 not.

2 So it's very difficult, and this document couldn't

3 have gone anywhere, because I don't think anyone truly

4 understood the position at the time. It's clearly for

5 discussion, but, as I say, I don't believe it went

6 anywhere, and I don't believe any member of that team

7 would have allowed an inaccurate document to go out into

8 the public realm if it could be avoided and to the best

9 of our knowledge.

10 Q. I'm bound to suggest to you, Mr Moore, that it was

11 irresponsibly risky for the BBA to make a statement like

12 this in circumstances where it had not yet fully

13 satisfied itself of the accuracy of the statements made

14 about fire performance in the certificate. Do you

15 accept that?

16 A. Well, no, I don't think necessarily I do agree with

17 that. This document I don't believe went anywhere at

18 all. I don't believe it's particularly accurate,

19 I don't believe it's sufficiently nuanced. It's in the

20 middle of our attempts to contact Reynobond. So, no,

21 Claire Curtis—Thomas may just have been simply mistaken.

22 The key thing is that nothing, to the best of my

23 knowledge, happened to this document. It clearly wasn't

24 right, so it didn't go anywhere, to the best of my

25 knowledge. So I don't think I agree with the assertion.

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1 Q. To your knowledge, did anybody tell any of the
2 recipients of this document or Claire Thomas that the
3 statement made in the second half of that answer was one
4 that the BBA could not and should not make?
5 A. Again, can I see the circulation list again, please?
6 Q. Yes, you can. We need to go back to {BBA00010428}.
7 It's on the screen in front of you, Mr Moore. Does that
8 help?
9 A. So of those names, Mr Albon knew a lot of the detail,
10 Mr Wroe knew a lot of the detail, Mr Webb and Mr Beale
11 didn't know the detail of this, they wouldn't entertain
12 doing anything with the document, and
13 Claire Curtis—Thomas, again, wouldn't know great detail.
14 So I am sure, because I'm sure you'll tell me if
15 this was the case, that this document wasn't circulated.
16 I don't remember the detail of telling
17 Claire Curtis—Thomas this is wrong or incorrect, but it
18 wasn't — you know, it wasn't an authoritative position
19 piece for the BBA at that time.
20 So to answer your question: no, I don't remember
21 telling Claire Curtis—Thomas this is wrong, but I can
22 say it didn't have any weight or significance.
23 Q. Let's turn to a different topic. I would like to ask
24 you to cast your mind back to a little later in the
25 story, January 2018.

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1 Can we go to your statement at {BBA00000159/4} and
2 let's look together at paragraph 11. You say:
3 "On Monday 29th January 2018, I met Tom Symonds,
4 a BBC journalist, at our Offices and was informed by him
5 that the BBC had information which suggested that
6 a change had been made to the core of the Reynobond PE
7 product in 2015 and Mr Symonds was inquiring about
8 whether the BBA was aware of this. I said that we would
9 look into the matter. In the days following that
10 meeting, my inquiries at the BBA indicated that we had
11 no record of being informed of any change to the
12 Reynobond PE core in 2015 or thereafter."
13 Were you told by the BBC what change or changes had
14 been made to the core of the Reynobond PE product?
15 A. Yes.
16 Q. What?
17 A. Mr Symonds had with him an email document which he was
18 carefully stewarding in my presence. It had the large
19 black felt—tip pen through identifying details of the
20 sender, and either he allowed me to read it or he put it
21 down, and I read that there was a change from
22 a translucent colour to a black colour, but I read that
23 at speed. But Mr Symonds did say that was the central
24 matter that he was investigating.
25 Q. At the meeting, did Mr Symonds tell you anything else

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1 about his discoveries?
2 A. He said that he was also investigating the fire
3 classification data relating to the product, which
4 I assumed meant the Reynobond PE product. I wasn't
5 clear whether he was talking about the changed core or
6 the panels that were used at Grenfell. And I'm not sure
7 he was entirely clear himself at a fairly early stage
8 what he was investigating in relation to the fire
9 classification data, but I may be mistaken as to what he
10 believed.
11 Q. Were you at that stage concerned that Mr Symonds, a BBC
12 journalist, had discovered something about Reynobond
13 panels that you should have known but did not know?
14 A. Yes, I was concerned.
15 Q. Let's move on.
16 If we go to {BBA00008363/3}, this is an email
17 string, and it starts on page 3 with the email of
18 30 January from Tom Symonds to you. Can you see that,
19 second half of the screen? He says:
20 "Dear Brian,
21 "Thanks again for the meeting yesterday.
22 "I wanted to make sure you had the URL of the
23 document which was publicly available — the 2015 test
24 result.
25 "I found it here: [then it looks like there is

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1 a link to something on the internet].
2 "I have been looking further at it today, and have
3 realised the significance of the fact that this report
4 sets out test results for both the black and grey
5 version of the product. This shows the company
6 specifically tested both versions, presumably having
7 changed the colour. The result overall was C but there
8 was a differentiation between the two versions.
9 I believe the black did better than the grey though I am
10 relying on basic web research on the relevant
11 measurements of fire development, so am checking this
12 with an expert.
13 "However given the C rating, and the fact that this
14 was a test after a change, I would assume that if the
15 BBA was not notified of a lower rating, that would be
16 highly relevant, regardless of the other evidence.
17 "Hope this helps.
18 "Tom."
19 Had Tom Symonds referred to the 2015 test results at
20 your meeting the previous day, 29 January?
21 A. I can't remember whether he — I don't think he went
22 through in detail fire classification reports, other
23 than that he was in possession of some.
24 Q. I see.
25 When you see here, as we've just read together,

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1 "I found it here: report", underlined in blue, which
 2 indicates that there is a weblink, what was that? What
 3 was the report? What was the site he had found the
 4 document in?
 5 A. I'm not entirely clear what that is referring to.
 6 Q. Well, he is sending you the URL of the document that was
 7 publicly available, he said, which was the 2015 test
 8 result, and he is telling you where he found it. My
 9 question to you is: what is that? Where did he find it?
 10 A. Overall, if I can just say where Mr Symonds and I ended
 11 up, he was not able to provide to me, nor was I able to
 12 get my hands on, provenanced material either from
 13 Arconic, so directly from Arconic, or directly from the
 14 CSTB. This was one of the issues. I think Mr Symonds
 15 was relying upon a well-placed source, one of his —
 16 I think a customer, and I don't believe I was ever able
 17 to go to a location and find material with a provenance
 18 linking it directly to Arconic or to the CSTB.
 19 Q. When you got this email, did you click on the word
 20 "report" that you can see underlined there?
 21 A. I must have done, yes.
 22 Q. What report did that reveal?
 23 A. As I say, I can't remember specifically what it was, but
 24 it was not something directly from Arconic or CSTB, is
 25 my best recollection. It was not from one of those two

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1 sources, to the best of my recollection.
 2 Q. Right. Can you remember what it was from or who it was
 3 from?
 4 A. No, I can't. Subsequently Mr Symonds sent me CSTB —
 5 what appeared to be CSTB reports with a whole litany of
 6 different email addresses and attached them, and
 7 I couldn't route anything back definitively to CSTB or
 8 to Arconic, and I think this was in that category, but
 9 I can't specifically tell you what the email address was
 10 at the other end of it. Believe me, can I make it clear
 11 to the Inquiry, I was very keen to provenance material
 12 back to Arconic or to CSTB.
 13 Q. Looking a little lower down the email, you can see
 14 you're told there by Mr Symonds that Reynobond PE was
 15 classified a C after this change. Did you understand
 16 that to have been a classification in accordance with
 17 the European testing regime?
 18 A. That was the assumption, yes.
 19 Q. Was that your assumption?
 20 A. Yes, forgive me, that was my assumption.
 21 Q. Did you understand in that moment that that
 22 classification C was inconsistent with the claim that
 23 the standard Reynobond product had achieved a class B as
 24 set out in both the first and the second issues of the
 25 Reynobond BBA certificate?

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1 A. Yes.
 2 Q. Is that something that you found troubling?
 3 A. Yes.
 4 Q. Did you ask yourself, "I wonder how Mr Symonds, a BBC
 5 journalist, could have found this out and the BBA had
 6 not"?
 7 A. Well, if I can go to the point I made yesterday, just
 8 the absolute importance of whistleblowers, and,
 9 you know, the lack of a good system in this industry to
 10 collate this intelligence. So I think Mr Symonds had
 11 the advantage of having well-placed sources available to
 12 him, whereas I didn't.
 13 I was keen to explore what Mr Symonds was providing
 14 to me, but the key issue, as I say, was provenance, and
 15 I never got to a point where I really understood that
 16 these documents emanated from Arconic or CSTB.
 17 But as you know and the Inquiry knows, separately
 18 I was trying to pursue these issues directly with
 19 Arconic to give me the material that they had, which
 20 would be route 1 to getting the information I needed.
 21 Q. You say that Mr Symonds had the advantage of having
 22 well-placed sources available to him, whereas you
 23 didn't; does that tell us that there was something
 24 structurally wrong with the BBA such that it couldn't
 25 get hold of underlying test data but someone like

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1 Tom Symonds could?
 2 A. Well, again, I am not sure that Mr Symonds ever got his
 3 hands — certainly when I was speaking to him — on
 4 provenanced material from Arconic or from CSTB. I may
 5 be wrong, that he did, but I don't remember receiving
 6 anything that had that provenance. So, to that extent,
 7 we were equally in difficulty, but he had the benefit of
 8 more about the balance of probabilities for media and
 9 publishing purposes than I had in terms of contract
 10 requirement with Arconic. So he could do more with what
 11 he had, whereas I felt I needed a bit more substantive
 12 evidence about the link to Arconic and to CSTB.
 13 But, again, I assure the Inquiry that I was trying
 14 to find this out directly from Arconic, as you know.
 15 Q. Well, I'm not sure that's an answer to my question,
 16 Mr Moore, but maybe we'll revisit it again in due
 17 course.
 18 Can we look at your response to his email, which you
 19 sent on 1 February 2018, which you will find on page 2
 20 of this email run {BBA00008363/2}. You say:
 21 "Hello Tom
 22 "Thank you for coming to see us ..."
 23 Can you see that there? It's copied to John Albon:
 24 "Hello Tom
 25 "Thank you for coming to see us about this sensitive

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1 matter. I'm grateful that you shared the background
 2 with us and we have undertaken to preserve reasonable
 3 confidentiality .
 4 "As I explained, the BBA has to balance its
 5 contractual obligations to our clients with our
 6 obligations as the UK's leading certification body.
 7 "We have checked our records and a result of doing
 8 so, we would wish to discuss the matters you raised with
 9 us with our Client. I cannot be more specific right now
 10 as it is right that we speak to our Client to seek their
 11 views.
 12 "However, and noting that the PE product has been
 13 withdrawn from the market, there is not an immediate and
 14 pressing need for us to engage with them but we need to
 15 do so as soon as possible.
 16 "I'll give you a call to discuss when you are
 17 proposing to approach the Company so that as far
 18 a possible we ensure our comms with them do not
 19 avoidably 'threaten' your story.
 20 "Can you suggest a good time later today to discuss
 21 this timing issue, please?"
 22 What contractual obligations were you referring to
 23 there in respect of Arconic?
 24 A. That disclosing information about them and their
 25 products and our engagement with them, without their

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1 knowledge or consent, was potentially a contractual
 2 problem.
 3 Q. Why, because of confidentiality concerns? Contractual
 4 obligations of confidentiality ?
 5 A. Yes, because of confidentiality .
 6 Q. I see.
 7 Now, you say that there was no pressing need for you
 8 to engage with Arconic because they had withdrawn PE
 9 from the market. That's what you say in the
 10 pre-penultimate paragraph.
 11 Did it not occur to you at the time that the
 12 product, Reynobond 55 PE, had been on the market for
 13 many years accompanied by an inaccurate and misleading
 14 certificate , so far as regards fire performance?
 15 A. Of course it had been on the market for a long time, but
 16 the immediate and pressing need, you know, the public
 17 safety criterion , because it had been withdrawn — yes,
 18 I think what I've said there is technically accurate,
 19 and I didn't want Mr Symonds' timescales to be mine, but
 20 we did — I make the point — want to deal with them as
 21 soon as possible.
 22 So, yeah, that statement is my thinking at the time.
 23 Yes.
 24 Q. My question really is: why wasn't there an immediate and
 25 pressing need for you to engage with Arconic given that,

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1 for some ten years previous, Reynobond 55 PE had been
 2 sold with a certificate that was inaccurate and
 3 misleading so far as regards fire performance?
 4 A. At this stage, of course, I didn't know exactly what was
 5 on the building and we were trying to establish this
 6 from the — we'd been trying to establish this from the
 7 company. We'd had some contact with them. And, yes,
 8 I was keen to — very keen to understand what had been
 9 on the building at that time. There was active
 10 discussions going on with Mr Symonds to try and get to
 11 the bottom of all this.
 12 So, yeah, there was a pressing need. I don't think
 13 it was immediate because there was nothing on the
 14 market, because they'd withdrawn the certificate, but
 15 I did want to get to the bottom of this as soon as
 16 possible, as I've said.
 17 Q. What did you mean by ensuring your comms didn't threaten
 18 the BBC's story?
 19 A. He was extremely concerned, and this was really the
 20 point of this email, that I couldn't tell him that we
 21 didn't know about this black core, it wasn't appropriate
 22 to tell him. I didn't want — he was very worried about
 23 his story being spiked by the BBA rushing to Arconic
 24 and, okay, well, thank you — I wanted to keep
 25 reasonable co-operation with him because he seemed to

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1 have good intelligence that I wanted. So I wanted to
 2 make sure that, as far as possible, our needs did not
 3 conflict with his. And as you know, within a few days
 4 of this, I was contacting Arconic, but I wanted to clear
 5 with him first that I could do so in a way that would
 6 not alienate him from us.
 7 Q. Let's look at how you approached the matter with
 8 Arconic.
 9 Can we look at the email of 6 February 2018 that was
 10 sent to Claude Wehrle and its follow-up. That we'll
 11 find at {BBA00010769/22}. You will see this is your
 12 email of 6 February to Claude Wehrle, timed at 17.27.
 13 It's entitled "Information from the BBC (Confidential)"
 14 and it reads:
 15 "Dear Mr Wehrle
 16 "The BBA has been contacted by BBC Television about
 17 a programme they are planning to broadcast in respect of
 18 the fatal fire at Grenfell Tower in London in June 2017.
 19 "The BBC has informed us that in 2015, Arconic may
 20 have made some changes to the PE material in the core of
 21 the Reynobond PE product and which may not have been
 22 communicated to the BBA.
 23 "We have not commented on this to the BBC, but we
 24 would like to understand whether or not any changes to
 25 the core of the PE product occurred in 2015 and whether

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1 or not you say that this was communicated to the BBA.
2 "I would be grateful for your response by the close
3 of business on Monday 12th February 2018, please."

4 Now, we've seen no response from Arconic to this
5 email, neither in the BBA records nor in any of the
6 Arconic records. Does that accord with your
7 recollection, that you never actually got an answer to
8 this email?

9 A. That's correct, though of course I kept on at this
10 for weeks and months afterwards, but specifically to
11 this email on that day or in the days immediately
12 following, no, I didn't get a response.

13 Q. Indeed.

14 Let's go to {BBA00010769/24}, two pages on. We can
15 see that you sent a further email to Claude Schmidt on
16 14 February 2018, as you can see there, forwarding your
17 email, "Information from the BBC (Confidential)", and
18 you say in the first line you're trying to gain
19 a response and perspective from Arconic. This is sent
20 to Mr Schmidt, and you had sent him the email you sent
21 to Mr Wehrle on 6 February.

22 We can see from this email, and indeed the email
23 we've just looked at, that you didn't ask Mr Wehrle
24 about the 2015 classification reports and the class C
25 for PE, did you?

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1 A. No, no.

2 Q. Why is that?

3 A. Well, first of all, I wanted to establish whether there
4 was any substance in this at all. I suspected there
5 was, but I wanted to hear, without putting — giving
6 away more than was prudent at that stage, I wanted to
7 hear what they had to say about it.

8 Q. Had you agreed with Mr Symonds not to mention it so that
9 Mr Symonds would be able to continue with his
10 investigations?

11 A. No, I didn't agree anything in detail like that with
12 Mr Symonds at all. No.

13 Q. Why did you not tell Arconic that you had learnt about
14 the existence of some 2015 classification reports which
15 had achieved class C and demand an explanation for why
16 you had not been provided with that information or the
17 test reports and an explanation about why the
18 certificate still said B?

19 A. Well, all that was to come. This, as we know, went on
20 for quite a period of time, trying to elicit this
21 information. At this stage, what did they have to say?
22 Did they even accept — there could have been
23 a perfectly innocent explanation. I wasn't sure it
24 would be, but I was trying to draw them out to tell me
25 what they had to say about this issue.

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1 Q. Why the softly—softly approach, Mr Moore? Why not just
2 tell them what you knew?

3 A. Well, I — not the way I chose to approach this. Get
4 the dialogue going. What did they have to tell me? Did
5 they agree, did they not agree, did they have anything
6 to say at all about this? That was my starting point.

7 Mr Symonds may not necessarily have been completely
8 correct. As I say, he didn't have provenance, as far as
9 I could see, other than the email about the PE core. My
10 approach, my strategy, was to draw out Arconic to tell
11 me what they wanted to tell me initially, and of course
12 I would be following it up.

13 Q. Why didn't you send them the link to the report or the
14 URL that Mr Symonds had sent you and ask for
15 an explanation?

16 A. No, I didn't think that was appropriate. They would
17 have information, they would send me information
18 directly that they had. There were so many documents
19 swirling around without provenance at this time, as
20 I said before, on the internet, even the journalists and
21 media, now this was potentially really quite confusing.
22 "Arconic, here's the issue, what do you know?", and
23 follow that up with, "What have you got?", was the
24 approach I thought was best.

25 Q. Now, we know from your statement at paragraphs 14 and 15

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1 {BBA00000159/5} that you received no response in writing
2 to this email, but you did get a phone call from
3 Mr Wehrle —

4 A. Yes.

5 Q. — on I think 19 February 2018.

6 Can we go to page 5 of your witness statement,
7 please. You see there that in paragraph 15 you say:

8 "On Monday 19th February 2018 at about 10.30 am,
9 I received a telephone call from Mr Wehrle. He
10 explained that there had been a change in colour of the
11 PE core from translucent to black. This had occurred in
12 May 2015 and was because of the 'market' finding the
13 black colour aesthetically more pleasing where the edges
14 of the cladding were visible. When I asked him whether
15 the BBA had been informed of this change, Mr Wehrle
16 explained that in 'August 2015', the BBA had visited
17 their manufacturing location and had been advised of
18 this change of colour, but no action had been taken by
19 the BBA. Mr Wehrle undertook, at my request, to email
20 me to this effect. I made a brief note of this
21 conversation in my daybook at the time of the call and
22 I produce a copy of this note as my Exhibit BM/2."

23 Now, BM2 is at {BBA00010770/3}, if we could look at
24 that, please. We can find the note on the right-hand
25 side. If you look on the right-hand side, you can see

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1 it says:
 2 "Claude Wehrle. 10.30am."
 3 Then below that — and correct me if I get this
 4 wrong — it says:
 5 "Change for translucent to black does not affect
 6 fire and is an aesthetic issue. You can see the edges
 7 which is not good for the market so our clients asked us
 8 to change to black which we did."
 9 If we just go down to the next page, please
 10 {BBA00010770/4}. Can you see top left of the screen:
 11 "We had a visit in August 2015 and they [I think
 12 that says] did not tell us about it."
 13 A. Yes.
 14 Q. Then it says, "The auditor [something]". Can you just
 15 read what that says, please?
 16 A. Yes, "The auditor did not take enough about it".
 17 Q. Right. Then underneath that:
 18 "Changes — fire regulations?
 19 "Flat or cassette?
 20 "Nothing to do."
 21 Now, in your statement, as we've just seen it, you
 22 say that you had a visit in August 2015, and this is him
 23 telling you this —
 24 A. Yes.
 25 Q. — "They did not tell us". Could you clarify what it is

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1 that Mr Wehrle actually said to you? Did he say "They
 2 did not tell us" or did he say "They did not take enough
 3 about it"?
 4 A. He said both of these things. Mr Wehrle's English was
 5 not the very best. He pores over his words and some of
 6 his phrases were not possibly the way you and I would
 7 describe things.
 8 His meaning and what I took from it was: the
 9 auditor — they raised with the auditor that there was
 10 material in binders and folders, we understand now, and
 11 they had told the auditor about this, relating to the
 12 change of colour from translucent to black and the
 13 fire test that went with it, and the auditor didn't tell
 14 us to do anything about it, and the auditor did not take
 15 the material, did not take enough information about it
 16 away with him at the time of the audit. That is what
 17 Mr Wehrle conveyed to me.
 18 Q. So Mr Wehrle was confirming to you in that conversation
 19 at the least that there had indeed been a change in the
 20 composition of the product?
 21 A. Yes.
 22 Q. Were you concerned about the accuracy of the claims in
 23 respect of Reynobond PE that had been on the
 24 BBA certificate in the light of what Mr Wehrle was now
 25 telling you?

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1 A. Yes.
 2 Q. Did you discuss the classification of the PE product
 3 with Mr Wehrle?
 4 A. No.
 5 Q. Now, you say in your statement that Mr Wehrle undertook
 6 to send you an email in relation to the discussion you
 7 had had with him. Is it right to say that he did not
 8 in fact email you as he had indicated he would?
 9 A. That's correct.
 10 Q. Did you press him to do so?
 11 A. Erm ... no, I think the next I remember is contact from
 12 his boss, Mr Schmidt.
 13 Q. Can we then move on to the story with Mr Symonds
 14 again — I say move on; move sideways, the same day.
 15 {BBA00009147}. There is a further email chain between
 16 you and Tom Symonds of the BBC on that day,
 17 19 February 2018. If we go to page 2 {BBA00009147/2},
 18 we can see that he writes to you on that day at 12.05:
 19 "Re: Cladding.
 20 "Hi Brian,
 21 "As promised. We've uncovered a series of
 22 classification reports resulting from tests commissioned
 23 by Arconic/Alcoa between 2011 and 2015. These are
 24 attached. The testing was done by the French CSTB but
 25 are not currently available through the CSTB website.

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1 "As you'll see, in only one test, in Feb 2011, does
 2 Reynobond PE achieve the B European rating as detailed
 3 on the product's BBA certificate.
 4 "Following that there were two tests in which the
 5 product was rated E — possibly because of incomplete
 6 tests, and two where the rating was C. We do not
 7 believe the BBA was notified about these tests, but
 8 obviously this is something you are investigating.
 9 "We have had some contact with the company, though
 10 Arconic has yet to give us an on the record statement
 11 because we have said we are carrying out additional
 12 research (which produced the attached).
 13 "Our feeling is that for now we will wait to see how
 14 the company responds to you. It would be helpful if you
 15 could let me know what happens your end.
 16 "Best wishes, Tom."
 17 If we go up the exhibit to page 1 {BBA00009147/1},
 18 we can see that you forwarded this email on to
 19 Valentina Amoroso the same day, in fact five minutes
 20 later, 12.10, and you attach a raft of what look like
 21 CSTB reports and you say — can we have that back on the
 22 screen, please?
 23 I'm so sorry, Mr Moore, the document has
 24 disappeared. You will need to have it back.
 25 (Pause)

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1 I wonder if something has happened.
 2 SIR MARTIN MOORE—BICK: Mr Millett, have we got a problem
 3 with putting up documents?
 4 MR MILLETT: It hasn't appeared on my monitor, and I'm
 5 assuming the witness can't see it either.
 6 Mr Moore, am I right you can't see the documents?
 7 THE WITNESS: I can't see documents.
 8 MR MILLETT: Right.
 9 It may just be that reference, then, but it was
 10 there and now it's disappeared. I don't know whether
 11 there is a general problem.
 12 I don't want to continue to ask questions,
 13 Mr Chairman, without the document.
 14 (Pause)
 15 I'll recite the document reference again. It was
 16 correct, because we had it on the screen — there it is,
 17 very good.
 18 SIR MARTIN MOORE—BICK: Right.
 19 MR MILLETT: Right, good.
 20 Now, you can see from that that there is a raft of
 21 what look like reports attached to your email to
 22 Valentina Amoroso.
 23 A. Yes.
 24 Q. Do I take it that you got those — it must be the
 25 case — from Tom Symonds?

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1 A. Yes.
 2 Q. Yes, and you say:
 3 "V, another coincidence: BBC just forwarded all of
 4 these. There would seem to be quite a few that we are
 5 unaware of."
 6 There are some seven CSTB classification reports
 7 attached, and they include four in particular, and I'll
 8 just recite them: there is RA13—0333, classification
 9 report for Reynobond PE cassette, 4 December 2014,
 10 showing class E, that's at {BBA00009151}; there was
 11 RA14—0339, classification report for Reynobond 55 PE
 12 riveted system, issued same day, 4 December 2014,
 13 classification C—s2, d0 {BBA00009152}; there was
 14 RA15—0200, classification report for Reynobond 55 PE
 15 riveted system, 22 September 2015, also showing C—s2, d0
 16 at {BBA00009153}; and also RA15—0021, classification
 17 report for Reynobond 55 PE cassette system, also issued
 18 22 September 2015, also showing classification E at
 19 {BBA00009154}.
 20 You say in your email, "There would seem to be quite
 21 a few that we are unaware of".
 22 Do you agree, looking at this, that on 19 February
 23 you were told, in both the email and the attachments,
 24 that following 2011, Reynobond PE had achieved only an E
 25 classification in relation to its rivet form and an E in

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1 respect of cassette, and then later a C in respect of
 2 rivet?
 3 A. Well, as I said before, if you read again what
 4 Mr Symonds has said, these are not documents that are
 5 necessarily sourced from CSTB. These are open—source
 6 documents, and at the same time I had I think Ms Amoroso
 7 and maybe someone else doing a similar exercise of what
 8 is out on the media, what is out in the — on the
 9 internet, that has provenance to Arconic or to CSTB.
 10 There is no doubt that I had suspicions that we had
 11 not been given the correct — the full picture, but this
 12 was not conclusive in its own right. My approach and my
 13 strategy was: only if it comes from Arconic or only if
 14 it comes from CSTB would it be solid.
 15 Q. But these are CSTB reports, aren't they?
 16 A. They appear to be, but again, if you look at Mr Symonds'
 17 comments, he has acquired them from I know not where.
 18 Q. Okay, let's take this in stages.
 19 Did you read these reports when you received them?
 20 A. Immediately then, no, I didn't, I think — I can't
 21 remember what else I was doing more pressing, but
 22 I forwarded them on to Valentina — well, the named
 23 people there, who were familiar with this case, for them
 24 to look at them.
 25 Q. Did you not sit down with them at least just briefly and

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1 compare what's said on these reports with what was said
 2 on the certificate?
 3 A. Certainly not then, but I'm sure at some point that
 4 I did, and it is clear that what these documents were
 5 saying, if correct, was at odds with the BBA's
 6 understanding of class B for the Reynobond product.
 7 But as you know, and I'll come back to it, I was
 8 still pushing and continued to push Arconic at the same
 9 time to provide us with information which it had. It
 10 was the important factor and player in this, with all
 11 due respect to Mr Symonds and the BBC, not necessarily
 12 information that he wanted to provide to us. It was
 13 great intelligence, valuable intelligence, but the most
 14 important thing was: what did Arconic have to say about
 15 this?
 16 Q. Did you see from these reports that both rivet and
 17 cassette had achieved classifications different from the
 18 BBA certificate?
 19 A. Yes.
 20 Q. Did that trouble you?
 21 A. Yes.
 22 Q. Did the BBA consider at that point suspending Arconic's
 23 BBA certificate?
 24 A. The certificate in respect of PE had been withdrawn,
 25 I believe, at this stage, because it was no longer in

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1 use for high-rise or for other use. So there was no
 2 BBA certificate for PE. In respect of FR, there still
 3 was.
 4 What I can tell the Inquiry at this stage is that
 5 the BBA was taking extensive legal advice about the
 6 handling of the BBC requirement to get information from
 7 us, our contractual obligations to Arconic at that
 8 stage, and also making disclosures to the public. So
 9 our lawyers and our counsel were involved in assisting
 10 me and us at this stage.
 11 Q. Did you or anybody at the BBA contact the CSTB directly
 12 to verify these reports and ask them whether there were
 13 any others that related to Reynobond 55 PE that they
 14 had?
 15 A. Yes, I asked Mr Wroe and/or Mr Albon to contact CSTB at
 16 quite an early stage, because that was the other route.
 17 There were two channels of provenance: one from Arconic
 18 and one from CSTB, and we had been making enquiries,
 19 I believe through Ms Amoroso or Mr Wroe or Mr Albon, of
 20 the CSTB website, which now no longer had material on
 21 it, and I understood that either Mr Wroe or Mr Albon,
 22 maybe both, had contacts at CSTB which I didn't have,
 23 and to see if CSTB would be willing to release
 24 information to us. And the response that I got back
 25 was, for various commercial reasons, they weren't

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1 willing to assist us, which left Arconic as the primary
 2 source of provenance for me, which I continued to
 3 pursue.
 4 Q. Did it not come as something of a shock to you to
 5 discover that there were all these reports showing
 6 dramatically worse classification for Reynobond PE than
 7 the certificate had done?
 8 A. Shock — I was very concerned, and the potential for the
 9 BBA having been misled, that was certainly in my mind
 10 now: well, how could this happen? And also, of course,
 11 that the BBA had misled or could be misleading users of
 12 the certificates were, you know, weighing on my mind at
 13 this time.
 14 So I had two things to investigate at this stage:
 15 the change of colour from PE — from translucent to
 16 black, and also the fire classification of the products
 17 that had been used at the Grenfell Tower.
 18 Q. Let's go to {BBA00009746}, please. This is an email
 19 that you sent to John Albon and Valentina Amoroso on
 20 23 February 2018 at 12.10.
 21 Something has gone wrong.
 22 SIR MARTIN MOORE-BICK: We have the wrong —
 23 MR MILLETT: Yes, it's not come back. {BBA00009746}.
 24 (Pause)
 25 Right. This is an email from you to John Albon and

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1 Valentina Amoroso on 23 February 2018:
 2 "I received a call from Mr Schmidt at Arconic re
 3 Reynobond. See my response below. In summary, he was
 4 more interested in the BBC and how we were going to
 5 handle inquiries than the substantive matter of whether
 6 the BBA had been provided with current data about the
 7 fire rating of Reynobond PE.
 8 "I felt that he was somewhat evasive — having to
 9 refer matters to his 'Board' — so I have given him
 10 a week to respond as to what the CSTB fire ratings were
 11 and why we [were] not told if they were different to our
 12 Cert value. Also, if there could be issues with any
 13 other Cert — I think Reynobond FR is still Certificated.
 14 "If we get no, or no satisfactory, answer, I would
 15 like to discuss our options."
 16 Did you tell Mr Schmidt in that call that you're
 17 referring to there that you had seen a series of reports
 18 generated by the CSTB showing materially worse
 19 classifications for Reynobond PE than the certificate
 20 had historically claimed?
 21 A. I don't think at any point I put to Mr Schmidt what we
 22 had from the BBC. My strategy was for him to provide me
 23 with information. Whilst it may sound fanciful, my
 24 experience, if you forewarn people, you know, bad things
 25 can happen, ie hiding, destruction, changing of

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1 documents. It was very simple: Arconic, tell me what
 2 you've got, show me what you've got about the Reynobond
 3 PE product.
 4 So, no, I wasn't, and I was still troubled by the
 5 fact that they claimed that all this had been shown to
 6 an auditor. I wasn't convinced that was true, and there
 7 was therefore the potential for dishonesty. Now, I'm
 8 not making allegations that they were dishonest, just
 9 what I was thinking of at the time.
 10 So, no, I wasn't going to alert Mr Schmidt or his
 11 people. By this stage, there was no real reason why
 12 they could not have forwarded to me the material that
 13 I'd asked for.
 14 So, no, I wasn't going to alert him and I wanted him
 15 to provide information to me. That was my thinking, my
 16 approach, which of course dragged on for some time after
 17 this as well. And you can see, I hope, that I began to
 18 reel them in around this, to the point where, well, they
 19 were deliberately choosing not to provide me with
 20 information about the PE product, in my opinion. They
 21 were deliberately choosing not to tell me about material
 22 they had.
 23 Q. So is it right you made a positive strategic decision
 24 not to confront Mr Schmidt with the reports that you had
 25 had, the materially different classifications that they

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1 showed, and demand full open—drawers disclosure of all
 2 fire test data from him at that time?
 3 A. That's correct, because I also knew that with such
 4 a terrible tragedy that had unfolded, there would be the
 5 police and there would be this Inquiry coming very soon,
 6 and I was not going to affirmatively alert Mr Schmidt
 7 and co about stuff that they may use potentially to
 8 their advantage.
 9 So, yes, this was my conscious approach. It was
 10 either going to be from CSTB or from Arconic, and this
 11 other information was helpful intelligence, but it was
 12 not definitive unless it had come from Arconic.
 13 Q. Given what you told us earlier, that you began to
 14 suspect that Arconic were misleading you or stringing
 15 you along or being evasive, what reason did you have to
 16 think that what they did tell you pursuant to your
 17 strategy would be true or reliable?
 18 A. Well, step 1 was to hear what they had to say and get my
 19 hands on the material that they claimed to have. So
 20 recover and retain was the approach that I preferred to
 21 take. But I was not going to affirmatively alert them
 22 of other inquiries — the BBC is a very capable
 23 investigative body. It had its own means and methods to
 24 bring information to the public realm. I wasn't going
 25 to interfere with that unduly, but I wasn't going to

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1 positively alert Arconic.
 2 Q. Now, you can see below this email an email that you sent
 3 to Mr Schmidt relating to the call. It's quite a long
 4 document. If we can just scroll down to page 2
 5 {BBA00009746/2}, you will see it. The same day,
 6 23 February, at 13.20, you say:
 7 "Dear Mr Schmidt
 8 "Thank you for your telephone call today clarifying
 9 that you would not be commenting to the BBC about
 10 matters relating to Grenfell and that the BBC would be
 11 undertaking further inquiries before releasing
 12 a programme. At your request, I indicated that the BBA
 13 does not discuss commercially sensitive information with
 14 the media.
 15 "From the BBA's perspective, I explained that we had
 16 not received a written response from Arconic to the
 17 question I posed in my email of 6th February to
 18 Mr Wehrle about the fire test data relating to PE. We
 19 have been told that CSTB has provided a number of
 20 reports about the fire performance of the PE product
 21 and, if that is information is correct, the BBA does not
 22 believe that it has seen this information. This would
 23 be particularly significant if the rating(s) was/were
 24 different to that which appeared in our Certificate.
 25 "I am sure that Arconic will have investigated

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1 thoroughly the timeline of this product and so I would
 2 believe that the required information is readily
 3 available.
 4 "Although Reynobond PE is no longer Certificated,
 5 other products are and we need to understand whether we
 6 have included the most accurate available information in
 7 them to ensure that our Certificates do not mislead any
 8 user.
 9 "I also explained that if there have been historical
 10 'issues', then provided that they are made known to us,
 11 we will work with you to address them, where possible.
 12 "In summary, the BBA requires of Arconic that you
 13 clarify to us the position in respect of the fire rating
 14 provided by the various CSTB fire reports (if they
 15 exist) that relate to Reynobond PE, and whether there
 16 are issues that may affect other products or systems
 17 that are currently Certificated by the BBA."
 18 Then you give a deadline of 5.00 pm on Friday,
 19 2 March 2018. Then you say:
 20 "If it is not provided, or without good explanation,
 21 the BBA will have to consider whether we continue to
 22 have confidence in other Certificated products/systems."
 23 Now, you set that deadline; that was your demand,
 24 wasn't it, for disclosure?
 25 A. It was a demand for disclosure, yes.

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1 Q. Then if we go on to the next document, you can see
 2 Claude Schmidt's response. If we go to
 3 {BBA00010769/29}, this is an email from Claude Schmidt
 4 on 28 February 2018:
 5 "Thank you for your email. The CSTB does indeed
 6 have a number of classification reports for Reynobond
 7 PE, which have been made publicly available on the CSTB
 8 website. When the BBA carried out its last audit on
 9 site in September 2017, we provided binders with those
 10 classification reports and underlying tests data (for
 11 both Reynobond PE and FR) to the auditor who indicated
 12 to us that for the purposes of his audit, he was not
 13 interested in them. Those documents were kept in—house
 14 at our Merxheim facility and would have been available
 15 to the BBA during prior audits. I am happy to send
 16 those documents to you now if you would like."
 17 Then he answers some other questions, and then at
 18 the end says:
 19 "To avoid any problems, I therefore think it would
 20 be best for you to speak with our lawyer,
 21 Teresa Hitchcock, at the law firm DLA Piper (cc'd here).
 22 She will be in a better position to answer any questions
 23 that you have."
 24 Now, you deal with this email in your witness
 25 statement at paragraph 17. Can we look at that, page 5

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1 of your statement, please {BBA00000159/5}. You recite
2 the statement and what's in it, and then in the middle
3 of the paragraph, you say:

4 "Mr Schmidt appeared to be suggesting that the BBA
5 had been provided with the opportunity and means to
6 become aware of changes to the Reynobond PE core, but he
7 stopped short of saying that we had been informed. In
8 the same email, Mr Schmidt also advised that we should
9 deal with his lawyer, Ms Teresa Hitchcock, at
10 DLA Piper LLP ..."

11 If we go to the next page of your statement
12 {BBA00000159/6}, paragraph 18, you say this by way of
13 extra:

14 "I was concerned about the implication of
15 Mr Schmidt's email as it inferred that the BBA should
16 have been aware of a change to the PE core, but it was
17 my understanding that we were not aware. There is
18 an obligation on our Clients to inform us of changes to
19 a product, not simply to generally direct us towards
20 binders, for example."

21 To your knowledge, Mr Moore, would technical
22 assessors such as Shaun O'Neill look at fire
23 classification reports during an audit or ask for them
24 to be produced for inspection?

25 A. Erm ... I'm not certain whether it would apply in every

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1 case or in some cases, but particularly if it was said
2 here that, given this very important case, this company
3 had drawn our attention to material and it hadn't been
4 looked at, then that is very significant.

5 Q. Did you receive the files or binders which Mr Schmidt
6 offered to send you?

7 A. No, I never received these files, and I don't know if
8 we'll cover it off, but you will see from the subsequent
9 email chain, I spent a lot of time trying to get my
10 hands on what he had almost promised in that email.

11 Q. Yes. I think the next thing that happens is that you
12 were invited to meet a representative of DLA Piper,
13 Arconic's solicitors, for a coffee and a chat.

14 A. Yes.

15 Q. And that meeting happened on 5 March 2018, didn't it?

16 A. It did.

17 Q. It happened, I think, at a meeting at a café away from
18 your office.

19 A. That's correct.

20 Q. Do you know why that meeting took place at a café away
21 from your office and not at your office?

22 A. Ms Hitchcock politely declined to meet at our offices.

23 Q. Why?

24 A. Yeah.

25 Q. Did she give you a reason?

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1 A. No, she didn't. There was some confusion about where we
2 would meet, but wherever we were going to end up, in her
3 view, was going to be somewhere outside a formal
4 building, either hers or mine, and it was going to be
5 for a coffee and a chat.

6 Q. Why? Why would it have to be away from your offices and
7 such an informal setting or occasion?

8 A. Well, I was concerned about this, and I was suspicious
9 about why this would be. So my concerns and suspicions
10 were that this would look like some attempt to
11 co-operate with the BBA and buy time, but I was also
12 concerned if there was misleading to be done, that that
13 kind of informal environment would be more conducive.
14 So I was concerned about this.

15 Q. Now, you tell us in your statement at paragraph 24
16 {BBA00000159/7} — and I don't think there is a need to
17 go to it — that it was during this meeting that you
18 were told by Ms Hitchcock that Mr Schmidt was preparing
19 a file for you of all fire test reports; is that right?

20 A. That is correct.

21 Q. Is it right, summarising what happened after that,
22 5 March 2018, that despite further requests from you in
23 March and April 2018, neither Arconic nor DLA Piper, its
24 solicitors, ever sent you the full suite of test reports
25 or classification reports for PE or FR Reynobond 55?

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1 A. I certainly saw nothing about PE, and I did receive
2 a bundle of FR, having chased and chased and chased,
3 which is what I then sent off to the Inquiry, because
4 I understood the Inquiry hadn't seen those. So I did
5 see some more FR material. I don't know if it was
6 everything that they had, but I did receive some more.

7 Q. Did there come a time when you wondered why it was that
8 you received FR but no PE material?

9 A. As time went on, my suspicions were aroused. There was
10 something seriously amiss about the PE and the fire
11 classifications. That was the only conclusion I could
12 draw about this.

13 The other hypothesis I had was that, if there was
14 nothing wrong with them and Arconic was just going to
15 make disclosure to the public inquiry and didn't want
16 the embarrassment of disclosure, you know, potentially
17 happening to us when it shouldn't have been to us, they
18 should have told us this in clear terms or clearer
19 terms. But I was running more about my suspicion that
20 there was something awry here than there was
21 a legitimate reason for not disclosing it. I may be
22 wrong, but those were my suspicions.

23 Q. Given your suspicions, why did you not write a formal
24 letter to Arconic demanding that, in compliance with
25 their contractual obligations, they turned over to you

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1 all relevant test data and classification data for
 2 Reynobond 55 in PE and in FR right the way back to 2008
 3 and before that, when the certificate was being drafted?
 4 A. Well, by this stage, into April, I had made numerous
 5 requests. I don't think it could have been clearer what
 6 I was looking for, and I was taking legal advice about
 7 how to proceed. Then it got to the point in April where
 8 I was pleased when we were contacted by the
 9 Metropolitan Police Service, the first authority or
 10 agency that approached us, and I made my disclosure
 11 about my suspicions to the detective who came to see us,
 12 and expected the Metropolitan Police to take this
 13 forward. I was really quite seriously concerned about
 14 what may be going on in the background, and I think it
 15 required a more formal investigation than I think the
 16 BBA could sustain.
 17 Q. Now, on the basis that you had given Arconic ample
 18 opportunity to provide the documents requested and you
 19 were aware that they'd made no full disclosure of the
 20 fire classification reports in respect of PE, why did
 21 the BBA not take action?
 22 A. What action? The PE core had been removed — sorry, the
 23 PE had been removed from the certificate, the FR
 24 certificate was still extant, and I was taking legal
 25 advice about that position, as to whether that should

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1 continue. And when — it was only when Dr Lane's report
 2 showed that she had other material that we hadn't seen
 3 and we had material that she hadn't seen, that the
 4 advice I was acting to meant we should move.
 5 Q. And what did you do?
 6 A. Which was to suspend and withdraw the certificate for
 7 FR.
 8 Q. Indeed. Why didn't you do that at a much earlier time,
 9 before the publication — or rather the provision of
 10 access to the BBA to Barbara Lane's report on
 11 2 November 2018?
 12 A. Personally, I would have liked to have done that sooner.
 13 Q. Well, you say, "Personally, I would have liked to have
 14 done that sooner"; you were, I think by this time,
 15 deputy chief executive officer of the BBA, weren't you?
 16 A. Yes, I was, but, as I say, I was taking legal advice
 17 about the situation.
 18 Q. So does it come to this: that even though you had been
 19 aware from as early as February 2018 from Mr Symonds
 20 that there were CSTB reports showing a materially lower
 21 classification for PE and for FR than the certificate
 22 stated, you didn't act to suspend or withdraw that
 23 certificate until after 2 November 2018, when you saw
 24 Dr Barbara Lane's report?
 25 A. When it got — so we've dealt with the CSTB —

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1 My Symonds' position, which I did discuss with our
 2 lawyers about provenance, et cetera, that they were
 3 not — they were intelligence but they weren't evidence,
 4 and it was not — yes, it's a fact, it wasn't until
 5 Dr Lane's report came through that the BBA moved to
 6 suspend and withdraw the FR certificate. That is
 7 a fact.
 8 Q. Do you accept that you could and should have done it far
 9 earlier in 2018, at the latest at the time when you
 10 realised that the certificate and the fire test data
 11 didn't match?
 12 A. The only point where the BBA had evidence of that —
 13 evidence, not intelligence or not information that was
 14 all over the internet — the only authoritative time
 15 when the BBA was aware of that was Dr Lane's report.
 16 The Metropolitan Police hadn't been able to help us
 17 before that, because they were very new into this, and
 18 the only authoritative position about what was on the
 19 building and what wasn't and all those factors came into
 20 place when Dr Lane's report came to the attention of the
 21 BBA.
 22 Q. Before you saw Dr Lane's report, did there come a time
 23 when you were satisfied that Arconic had given you full
 24 disclosure of all relevant test data and classification
 25 reports for Reynobond 55?

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1 A. Did there come a time when I was satisfied?
 2 Q. Yes.
 3 A. Well, because they hadn't produced the PE material to
 4 me, then no. But the —
 5 Q. No.
 6 A. — PE product was not certificated at that time, only
 7 the FR, and FR material had been provided to the BBA.
 8 Q. Given that there never came a time when you were fully
 9 satisfied that Arconic had provided you with all the
 10 documents that you had been after for so many months, as
 11 you have told us, why didn't you act then, at a much
 12 earlier stage, to suspend and then withdraw the
 13 certificate, rather than waiting to see what Dr Lane had
 14 to say about it?
 15 A. Well, I — again, we'd involved the Metropolitan Police
 16 in this, who were getting up to speed, and the only time
 17 I was absolutely fully sure about what was on the
 18 building and the situation with the fire test reports
 19 was Dr Lane. It was at that point that the legal advice
 20 was absolutely clear that we could act to suspend the
 21 certificate.
 22 Q. Well, do you accept that in acting only to suspend the
 23 certificate after 2 November 2018, the BBA acted in
 24 a way that was supine and leaden-footed?
 25 A. No, I don't accept that at all. I don't think that's

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1 a fair description. I spent a great deal of time trying
 2 to put pressure on Arconic to the best I could to
 3 acquire this information. I don't think it is fair or
 4 accurate to describe the BBA's approach in that way. We
 5 had taken legal advice from the time the BBA(sic)
 6 contacted us and were trying to be proportionate. But
 7 I never ever was supine or leaden-footed — well,
 8 leaden-footed is a matter of opinion. I never felt
 9 supine towards trying to get information from Arconic
 10 that I thought we needed.

11 Q. So what was it that you were waiting for before taking
 12 the decision to suspend or withdraw the certificate?

13 A. Specifically I was very interested in Mr O'Neill, the
 14 auditor who had been to Merxheim and was or was not
 15 shown these documents. That to me would have been very
 16 significant, if he'd said, "No, I was never shown these
 17 documents".

18 Now, you will see in my statement that I pressed
 19 the Met to try to get to this stage quite soon.
 20 I thought he was a very significant witness. But my
 21 ability to interview or to investigate would probably
 22 entail that I needed to travel to Merxheim and interview
 23 a number of people who allegedly saw these documents.
 24 That was something I wasn't capable of doing, and it
 25 wasn't appropriate, because I think that's a matter for

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1 formal investigation.

2 So you will see in my statement that I raised, in
 3 May, I believe, May 2018, that I thought this would be
 4 very — an important thing for the police service to
 5 undertake, and around that point I was willing to have
 6 interceded, because I think that would have dropped
 7 another element into the equation about whether we were
 8 being misled or not. But I wanted the police service
 9 involved in that, and I think it was only September 2018
 10 that the Metropolitan Police began to engage with
 11 Mr O'Neill, and I never saw the outcome of that, which
 12 was regrettable.

13 One of the things that I should have done was
 14 insisted that a member of the BBA be present during that
 15 meeting between the Metropolitan Police and Mr O'Neill
 16 when a statement was taken from him. So I didn't do
 17 that, because I wanted Mr O'Neill to not feel under any
 18 pressure from the organisation at all. If we had have
 19 been there, and had that confirmed, then maybe that
 20 would have been, in my view, sufficient. But that was
 21 September/October, and it just coincided pretty much
 22 with Dr Lane's report.

23 So, yeah, there were a couple of things going on
 24 that would have helped me come to that determination
 25 a little sooner.

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1 Q. Both Ms Amoroso — Mr Chairman, I note the time, this is
 2 my last question, or pair of questions, perhaps — and
 3 Mr Nkomo both told the Inquiry that it wasn't
 4 Mr O'Neill's job as auditor or technical assessor to
 5 collect these sorts of documents, so why would you have
 6 thought that he would have had them, other than on
 7 Mr Schmidt's say-so?

8 A. Well, exactly. If their defence — and again, forgive
 9 me, I'm not making allegations, I hope, unfairly against
 10 Arconic, but if their defence was that they had made
 11 a disclosure to the BBA of fire test reports to
 12 Mr O'Neill at that location, and having offered —
 13 I don't know what had gone on, having offered them or
 14 pushed him towards them, and that wasn't true, that was
 15 very significant. If Mr O'Neill had had these things
 16 pushed towards him, well, that was something that the
 17 BBA would be accountable for.

18 So I think it was very important, this very specific
 19 thing that they were potentially hiding behind or could,
 20 you know, help their case, should be dealt with, and
 21 that's why I thought Mr O'Neill was very important.

22 MR MILLETT: Mr Chairman, I've come to the end of my
 23 prepared questions and it's just gone 1 o'clock. Would
 24 that be a convenient moment?

25 SIR MARTIN MOORE-BICK: It would.

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1 Is this the point at which we would normally have
 2 a break for other people to consider questions as well?

3 MR MILLETT: Yes, it is, and I was going to suggest that we
 4 elide the lunch break with my examining my own notes and
 5 giving the opportunity to others to —

6 SIR MARTIN MOORE-BICK: So was I, but I think it's fair just
 7 to explain to Mr Moore where we've got to.

8 Mr Moore, as you have just heard, Mr Millett thinks
 9 that he has reached the end of the questions he wants to
 10 put to you, but normally we would have a break at this
 11 stage just to give him a chance to check that, and also
 12 to give other people who are following the Inquiry the
 13 opportunity to suggest additional questions.

14 I think you were hoping to get away this side of
 15 lunch, but would it be a great inconvenience — I hope
 16 it wouldn't — for you to come back at, let's say, 2.05,
 17 and then to field any further questions that may arise
 18 at that stage?

19 THE WITNESS: Thank you, Mr Chairman. I will be here at
 20 2.05.

21 SIR MARTIN MOORE-BICK: All right, and we will see then if
 22 there are any further questions.

23 As I said to you before, please don't discuss your
 24 evidence or anything to do with it with anyone over the
 25 break.

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1 THE WITNESS: I understand.
 2 SIR MARTIN MOORE—BICK: Thank you very much. 2.05 then.
 3 THE WITNESS: Thank you.
 4 (1.05 pm)
 5 (The short adjournment)
 6 (2.05 pm)
 7 SIR MARTIN MOORE—BICK: Good afternoon, everyone, welcome
 8 back. We're now going to see whether Mr Millett has any
 9 further questions for our witness, Mr Moore.
 10 So I'll begin by checking that Mr Moore is there.
 11 He can see me and hear me, I hope.
 12 Hello, Mr Moore.
 13 THE WITNESS: Yes, hello, Mr Chairman, I can see you and
 14 hear you clearly.
 15 SIR MARTIN MOORE—BICK: Good, thank you very much.
 16 We will now find out if Mr Millett has some more
 17 questions for you.
 18 Mr Millett.
 19 MR MILLETT: Yes, Mr Chairman, thank you, I do.
 20 We were looking at a document before the morning
 21 break at {BBA00009596}, and you will recall that this
 22 was an email about the FAQs. I'm going to ask for
 23 another document to be put up on the screen at the same
 24 time, namely {CTAR00000043}.
 25 Now, you will remember this morning, Mr Moore, that

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1 you and I were examining on the letter on the left of
 2 the screen, the email from Richard Beale of 6 July 2017
 3 to you, John Albon and Simon Wroe about the employees
 4 who had raised some concerns relating to FAQs regarding
 5 Grenfell Tower.
 6 Now, I would like just to explore with you a little
 7 bit more what those FAQs were, because I think you had
 8 some concerns that you weren't being shown the right
 9 ones.
 10 If you look at the right—hand side of the screen
 11 {CTAR00000043} you can see that there is a document
 12 which starts at the top "BBA Certification and what it
 13 means", and then if you look halfway down the screen:
 14 "You can find out more about this and the BBA from
 15 our website."
 16 Then underneath that it says:
 17 "BBA Statement relating to all enquiries regarding
 18 BBA certification and the fire testing of products."
 19 If we go to page 2 in that document
 20 {CTAR00000043/2}, you can see at the top of that page it
 21 says, "Frequently asked questions relating to
 22 Grenfell Tower". The first question, "What is the
 23 status of a BBA certificate?"
 24 Then halfway down the page, two—thirds of the way
 25 down the screen, you can see there is an "Update

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1 4th August 2017: see Q&A14 for updated position", and
 2 then there are further Q&As below that.
 3 My first question is: is this document on the right
 4 of the screen the FAQs in respect of which the employee
 5 had raised the concerns, as recorded in the email on the
 6 left of the screen?
 7 A. I don't know if it is the same, but there were FAQs on
 8 the website and you did point out some other ones,
 9 I think, to local authorities, so I'm not sure which of
 10 the two are being referred to.
 11 Q. All right.
 12 Do you know how long the FAQs, as it were, or Q&As
 13 had been on the BBA website before the update on
 14 4 August 2017?
 15 A. No, I don't, I'm afraid.
 16 Q. All right.
 17 Now, if we scroll down a little bit further, if we
 18 look halfway down page 2, we can see that in the middle
 19 of the page there are two paragraphs, just above "Update
 20 4th August", do you see?
 21 A. Yes.
 22 Q. I want to show you the first of those says:
 23 "The Certificate has remained in its current form
 24 since issue in 2008; as stated above there have been no
 25 significant Regulatory changes that would have required

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1 a Reissue of the Certificate."
 2 My question there is — well, if you look actually
 3 on the left—hand side of the screen {BBA00009596/1},
 4 before I get to the question, you can see that the
 5 concern raised by the employee is, in item 2:
 6 "No significant regulatory change which leads to
 7 certificate change, (false)."
 8 Mr Beale has put in:
 9 "There have been a number of regulatory changes
 10 since 2008, which would have led to a change in the
 11 certificated being updated and changed. E.g. Following
 12 review of report S1/53729 in 2014 in which BBA sent
 13 report and contract which highlights regulatory changes.
 14 The contract was not followed up and thus certificate
 15 was not updated. Web statement gives the impression
 16 that the certificate is up to date."
 17 Do you agree that in the paragraph I've shown you in
 18 the FAQs so far, the web statement does give the
 19 impression that the certificate is up to date when it
 20 wasn't?
 21 A. I don't believe there were significant regulatory
 22 changes. I'm sure the Inquiry can confirm that, but
 23 that seems to be the key part of the sentence.
 24 If it was the case that there had been significant
 25 regulatory changes that would have required a re—issue

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1 of the certificate, then clearly that statement is not
 2 accurate. But I can't agree unless I'm aware whether
 3 there were significant regulatory changes that would
 4 have required a re-issue. Can you help me?
 5 Q. Well, let me try it this way: you told us this morning,
 6 very helpfully, in your evidence that at some point, you
 7 weren't sure whether it was before or after the fire,
 8 but at some point, the BBA had arrived at a consensus
 9 that because of the filler debate, if I can use
 10 a shorthand, a panel such as Reynobond PE 55 had to
 11 comply both with the combustibility requirements under
 12 section 12.7 and the requirements of diagram 40; do you
 13 remember that?
 14 A. Yes.
 15 Q. Now, that may not have been a regulatory change, but it
 16 was certainly, wasn't it, a change in opinion on the
 17 part of the BBA about what the regulations meant and how
 18 they should be applied?
 19 A. Well, I think that's a different question to whether
 20 there had been significant regulatory changes, with
 21 respect, so I'm not sure that that statement is, as the
 22 whistleblower suggested, misleading. It doesn't strike
 23 me that way, but that must be a matter for others to
 24 judge. So I don't think that's necessarily incorrect.
 25 Q. Let me just pin you down, if I can.

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1 Would you accept that if in fact the BBA had come to
 2 the opinion that there was a double requirement in
 3 Approved Document B for products such as Reynobond 55,
 4 namely satisfaction of section 12.7 to show that it was
 5 limited combustibility because it had a PE core, and
 6 also satisfaction of diagram 40, either by achieving
 7 class 0 or class B or better, then that new view is
 8 something that is not reflected in the paragraph I've
 9 been reading to you on the right of the screen, "The
 10 Certificate has remained in its current form",
 11 et cetera, is it?
 12 A. I can agree it is not reflected in that paragraph, but
 13 I don't believe that amounts to being a significant
 14 regulatory change. The capital R of "Regulatory"
 15 suggests it's a statutory instrument or a law. So I'm
 16 not sure I could agree with your assertion.
 17 Q. Right. So literally I understand what you're saying,
 18 but the spirit of what's being imparted here wouldn't be
 19 accurately represented, would it, if in fact the BBA had
 20 decided that the Building Regulations now required
 21 a double requirement as opposed to the single
 22 requirement implied by the certificate?
 23 A. Well, I think in the nature of FAQs, that's, you know,
 24 a distinction that would take some clarification there.
 25 On balance, I don't think I'm persuaded. But if there

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1 had been a change in regulatory — in the law,
 2 significantly in that period, and the BBA had made this
 3 statement, then I would agree with you. But, on
 4 balance, I'm not able to agree with you at the moment.
 5 Q. All right. I'm not seeking to persuade you of anything,
 6 I'm just trying to get to the bottom of what you're
 7 prepared to accept.
 8 Looking at the next one down {CTAR00000043/2}, it
 9 says:
 10 "We can confirm that Certificate 08/4510, Reynobond
 11 Architecture Wall Cladding Panels, has been the subject
 12 of regular three yearly reviews by the BBA since its
 13 update."
 14 The complaint by the whistleblower employee on the
 15 left — hand side of the screen {BBA00009596/1} is at
 16 item 1, I showed you this earlier:
 17 "Certificate is subject to regular 3 yearly reviews
 18 is correct, but misleading."
 19 It goes on to say:
 20 "Reissues that should have been carried out have not
 21 been undertaken, so certificate is out of date, i.e.
 22 certificate refers to building regulations and NHBC
 23 regulations which are out of date, and does not refer in
 24 any way to updated regulations."
 25 Now, leaving aside the reasoning there, it is right,

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1 isn't it, that a re-issue should have been carried out
 2 far earlier than it had been in 2017?
 3 A. I think that — I don't know the exact chronology, but
 4 I think that that should be a factual matter. If
 5 reviews were not carried out regularly at three-year
 6 intervals, then that statement is not correct.
 7 Q. Then if we can go down, please, a little bit further in
 8 the document on the right-hand side of the screen,
 9 please, to page 3 {CTAR00000043/3}, I would like to just
 10 show you one paragraph towards the bottom of the page
 11 there. It's the penultimate paragraph and it says this,
 12 read with me:
 13 "The Standard version was also tested to the
 14 British Standards BS 476-6:1989 and to BS 476-7:1997.
 15 When taken together, this means that this product can
 16 also be categorized as Class 0 by the
 17 Building Regulations."
 18 Now, I think you accepted earlier — let me just put
 19 it to you again — it's correct, isn't it, that the BBA
 20 had never seen any test data showing that the standard
 21 version of Reynobond 55 PE had been tested to standards
 22 BS 476-6 or 7?
 23 A. Again, I think that's a matter of fact. If the standard
 24 version wasn't, and I'm not aware that it was, if the
 25 standard version was not subject to that process, then

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1 it's not accurate to say that in this document.
 2 Q. Indeed. Can you account for why this document did say
 3 that the standard version had been tested to BS 476—6
 4 and 7?
 5 A. Again, I can't. As before, when we looked at this this
 6 morning, above it is this — the European classification
 7 reference, and again, I just feel that sometimes people
 8 conflate the two. So if one has achieved one
 9 categorisation or classification, it is assumed ergo
 10 that the other must apply. That's all I can think of,
 11 because I think it's twice we've seen that today. But
 12 I don't know, is the answer.
 13 Q. Leave aside the European classification. On the
 14 assumption that the standard version had never been
 15 tested at all to BS 476—6 or 7, and on the similar
 16 assumption that the BBA had never seen any evidence of
 17 any such tests, do you accept that the statement made
 18 there is erroneous and misleading?
 19 A. On the premise that you've put, yes.
 20 MR MILLETT: Thank you.
 21 Mr Chairman, I've got no further questions for this
 22 witness, and therefore it remains for me to thank you,
 23 Mr Moore, very much for coming to the Inquiry and for
 24 assisting us with our investigations. We are extremely
 25 grateful to you. Thank you.

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1 THE WITNESS: Forgive me, is it possible I can just make —
 2 there are four points I would like to make, if possible,
 3 about how organisations like the BBA can be helped in
 4 the future. Is it possible to have a minute to do that?
 5 SIR MARTIN MOORE—BICK: You can have a minute to do that,
 6 Mr Moore, although we've got another witness waiting to
 7 be heard, so I think I must ask you to keep it quite
 8 brief.
 9 THE WITNESS: Yes, thank you, Mr Chairman.
 10 So my four points are as follows.
 11 The first one, organisations like the BBA need to
 12 understand that it is more likely than not that some of
 13 their clients under commercial pressure will behave
 14 unethically, and therefore the systems that the BBA and
 15 organisations like it have about gathering intelligence
 16 about malpractice need to be more developed. That's
 17 point number 1.
 18 Point number 2, to help the BBA in that role, the
 19 current commercial arrangement about contracts is too
 20 weak. The worst that can happen is you tear up
 21 a contract and walk away, but the public can still be at
 22 risk.
 23 I believe that you have received a submission, which
 24 I endorse, from the BBA that deliberately misleading
 25 a certification body through act or by omission and

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1 failing to disclose relevant evidence should be
 2 a criminal offence, because that contract is too weak as
 3 it is.
 4 Thirdly, that testing, safety—related testing should
 5 be mandatory and periodic. It shouldn't be a matter of
 6 good practice that some can adopt and some can't, it
 7 needs to apply to everybody, and all certification
 8 bodies are under the same requirement to have this
 9 happen so that there is no race to the bottom if some do
 10 it and some don't.
 11 Fourthly, and finally, that every organisation that
 12 has safety—related products that it manufactures, it
 13 must have a whistleblower scheme in its organisation as
 14 part of its conditions of operating, and that auditors
 15 and regulators review how that whistleblowing policy is
 16 being managed and whether there are disclosures coming
 17 from it, and there is a prescribed body with
 18 responsibility for construction products to whom those
 19 disclosures are collated and assessed to provide
 20 a picture of intelligence about the ethical health of
 21 the industry and able to act upon it in a structured and
 22 coherent way.
 23 In my opinion, those things are not sufficiently
 24 evident, and I would ask, if the Inquiry thinks there is
 25 any merit in what I have said, would it give those

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1 points consideration.
 2 SIR MARTIN MOORE—BICK: Well, that's very helpful. Thank
 3 you very much, and I can assure you we will take your
 4 points into consideration when we come to making
 5 recommendations in due course.
 6 For the moment, it just remains for me to thank you
 7 very much on behalf of myself and the panel for coming
 8 to give us your evidence. It's been really helpful to
 9 us to hear what you have to tell us, and we are very
 10 grateful indeed. So thank you very much.
 11 Now you are free to go.
 12 THE WITNESS: Thank you, Mr Chairman.
 13 SIR MARTIN MOORE—BICK: Thank you.
 14 (The witness withdrew)
 15 SIR MARTIN MOORE—BICK: We shall now have a short break
 16 while we organise ourselves for the next witness.
 17 (2.22 pm)
 18 (A short break)
 19 (2.33 pm)
 20 MR CHRIS HUNT (called)
 21 SIR MARTIN MOORE—BICK: Welcome back, everyone. We're now
 22 ready to meet our next witness, who is
 23 Mr Christopher Hunt of the BBA.
 24 My first task, as always, is to check that Mr Hunt
 25 can see me and hear me and is in contact with us.

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1 So, Mr Hunt, are you there?
2 THE WITNESS: Yes, I am, Mr Chairman, yes.
3 SIR MARTIN MOORE-BICK: Good afternoon.
4 THE WITNESS: Good afternoon.
5 SIR MARTIN MOORE-BICK: I understand that you are willing to
6 make the affirmation, and that should appear on your
7 screen in front of you. Have you got it there?
8 THE WITNESS: I have.
9 SIR MARTIN MOORE-BICK: Good. Then could I ask you to make
10 the affirmation by reading the words on the screen.
11 (Witness affirmed)
12 SIR MARTIN MOORE-BICK: Very good, thank you very much
13 indeed.
14 Now, before we get to the point of actually putting
15 some questions to you, there are just one or two things
16 I need to cover.
17 First of all, can you confirm that you're alone in
18 the room from which you're giving evidence?
19 THE WITNESS: I can.
20 SIR MARTIN MOORE-BICK: Thank you.
21 Can you confirm that you have no documents or other
22 materials with you?
23 THE WITNESS: I can.
24 SIR MARTIN MOORE-BICK: And can you confirm that your mobile
25 phone is in another room and that you don't have any

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1 other electronic device with you which is capable of
2 receiving messages?
3 THE WITNESS: Yes. I don't have either of those things.
4 SIR MARTIN MOORE-BICK: Lovely, thank you very much indeed.
5 Now, I hope we shan't have problems with sound or
6 vision, you're never quite sure, but if we do, we'll
7 have a short break while the technical support team iron
8 them out.
9 We shall have a scheduled break during the course of
10 the afternoon. We would normally take it about 3.15.
11 I'm going to suggest that we take it a bit later than
12 that today, perhaps 3.30 or shortly thereafter. If you
13 feel that you need a break at any time, will you please
14 indicate that and we will do our best to accommodate
15 you. All right?
16 Now, before I invite counsel to put some questions
17 to you, is there anything you would like to ask me or
18 anything you would like to raise?
19 THE WITNESS: No, I don't think so, thank you, sir.
20 SIR MARTIN MOORE-BICK: Right, thank you very much. In that
21 case, I'm going to invite Ms Troup to ask you some
22 questions.
23 Yes, Ms Troup.
24 Questions from COUNSEL TO THE INQUIRY
25 MS TROUP: Thank you.

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1 Mr Hunt, good afternoon. Before I start, could
2 I check first, please, that you can see and hear me
3 clearly?
4 A. Yes, I can.
5 Q. All right.
6 Can I start, then, by thanking you for attending
7 this public inquiry to give evidence, it is very much
8 appreciated.
9 I'm going to ask a couple of things of you.
10 Firstly, if you have any difficulty understanding any of
11 the questions that I ask, please just say so and I can
12 put the question again or put it in a different way.
13 I'm also going to ask you to try to ensure that you
14 keep your voice up, because there is a transcriber on
15 the call who is taking down all of your evidence and
16 it's important that she hears it.
17 Lastly, for the same reason, if you're going to
18 answer "yes" or "no" to a question, please try to do
19 that in words and not with a nod or shake of the head
20 because obviously that cannot be recorded on the
21 transcript. All right?
22 A. Okay.
23 Q. Mr Hunt, you provided a witness statement to
24 the Inquiry; yes?
25 A. Yes.

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1 Q. If we can get that up on the screen, please, it's at
2 {BBA00011087}. We're just going to take a look at that
3 together.
4 Just looking at the first page, is that your witness
5 statement?
6 A. Yes, it is.
7 Q. If we can go through, please, to page 32, you will see
8 that there is a signature there at the bottom. Do you
9 see that?
10 A. Yes.
11 Q. Is that your signature?
12 A. It is.
13 Q. We can see that your witness statement is dated
14 20 January 2020; yes?
15 A. Yes.
16 Q. Have you read your witness statement recently?
17 A. Yes, I have.
18 Q. Can you confirm that the contents of it are true and
19 accurate?
20 A. Yes, I can.
21 Q. Lastly, have you discussed your statement or your
22 evidence with anyone before coming here today?
23 A. No, I haven't.
24 Q. Thank you.
25 All right, if we go now, please, to page 2 of your

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1 witness statement {BBA00011087/2}, I'm just going to
 2 take you through some of your roles at the BBA and your
 3 training. If we look, please, at the table you have
 4 provided to us there, in the top line, here you're
 5 setting out your own qualifications and training; yes?
 6 A. Yes.
 7 Q. In the top line you tell us that in 1985 you obtained
 8 a Bachelor of Science in physics and acoustics from the
 9 University of Surrey; is that right?
 10 A. Yes, I did.
 11 Q. If we go down, please, to paragraph 5 on the same page,
 12 we learn there that you joined the BBA in 1986 as
 13 a project manager or product assessor; yes?
 14 A. Yes, that's correct.
 15 Q. You say there in relation to that role, looking at the
 16 first bullet point, that you:
 17 "Performed assessment, testing, factory production
 18 control and evaluation of construction products, with
 19 a focus on windows, doors, cladding and curtain walling,
 20 heating, plumbing and drainage products."
 21 Is that right?
 22 A. Yes, that's right.
 23 Q. At the second bullet point there you say that, during
 24 the course of that role, you also learnt the assessment,
 25 certification, inspection and testing functions; yes?

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1 A. Yes.
 2 Q. If we go on down, please, to paragraph 6, we can see
 3 that in 1989 you moved to the role of section head at
 4 the BBA. Was that a promotion, Mr Hunt?
 5 A. Yes, it was.
 6 Q. You remained in that role until 2007, we see.
 7 I think — is this right? — you say there that you were
 8 the technical lead and managing the BBA's windows and
 9 doors certification business; yes?
 10 A. Yes, yes, there was a lot of work on windows and doors
 11 at that time, and —
 12 Q. Yes.
 13 A. — yeah, I became the technical lead in that sort of
 14 area.
 15 Q. I see.
 16 You say that in that role you were managing four
 17 product assessors. Can you help me, is the role product
 18 assessor and project manager the same thing?
 19 A. Yes. I think at the time — at that time, when I was
 20 section head, the job title was product assessor. It
 21 then — I can't remember exactly when this was, but it
 22 became — the role name changed to project manager.
 23 Essentially they were the same roles.
 24 Q. Yes, I see.
 25 A. It was a change, yeah.

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1 Q. Thank you.
 2 If we move over to page 3 of your witness statement
 3 {BBA00011087/3} now, please, and to paragraph 7, we can
 4 see that in 2007 you moved into the role of head of
 5 approvals; yes?
 6 A. Yes, that was head of approvals for the physics — what
 7 was called the physics team.
 8 Q. The physics team, I see. What did that cover?
 9 A. At that — it was made up of the — it was a new team,
 10 essentially, approvals team. There was quite a big
 11 re-organisation at the BBA at that time to combine
 12 a number of smaller sections into larger teams. So —
 13 Q. Yes.
 14 A. — that was a combination of the section that I was head
 15 of previously, windows, doors and associated products,
 16 with another section that dealt more with insulation and
 17 ventilation products.
 18 Q. I see, thank you.
 19 So looking at what your role as head of approvals
 20 involved, you say there that it included responsibility
 21 for product certification — this is in the third line
 22 of paragraph 7 — including agrément and ETAs, of
 23 windows, doors, insulation, ventilation and other
 24 building fabric products; yes?
 25 A. Yes.

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1 Q. At your first bullet point there, staying at
 2 paragraph 7, you say that you were responsible for
 3 contract review, assignment of work, test and assessment
 4 method development, certification decisions and audit of
 5 project files; yes?
 6 A. Yes.
 7 Q. I think in that role, yes, in the second line of
 8 paragraph 7, you tell us that you were then managing 12
 9 project managers.
 10 A. Yes, approximately. It went up and down a little bit
 11 during that period, but it was about that number.
 12 Q. Yes. Did those include George Lee?
 13 A. It did, yes.
 14 Q. What about Simon Lloyd?
 15 A. I think — no, I don't think I ever managed Simon. He'd
 16 already I think left the BBA before I took up that role.
 17 Q. I see.
 18 Going down now, please, to paragraph 8, you tell us
 19 that in 2010 you moved into a different role, which is
 20 called development project manager, and there are no
 21 details there.
 22 Could you just tell us — well, firstly, do you know
 23 when in 2010 you moved into that role, development
 24 project manager?
 25 A. I don't exactly. I'm sorry, I don't remember the exact

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1 date.
 2 Q. No, no.
 3 A. It may be something that BBA will probably have on file
 4 for personnel records. I think, just from memory, I'm
 5 thinking it would be maybe April time, but I could be
 6 wrong on that.
 7 Q. Mr Hunt, I'm sorry, just going back up to paragraph 7,
 8 please, and to the third line in your witness statement,
 9 what is an ETA?
 10 A. Oh, sorry, that is a European technical approval.
 11 Q. I see, thank you.
 12 All right, going back now, I'm so sorry, to your
 13 next role, which is development project manager, could
 14 you just give us a very brief idea of what that role
 15 involved?
 16 A. Yeah, it was mainly — so outside the mainstream
 17 operations teams, it was looking at future work,
 18 particular projects that needed developing before they
 19 could go into the operations teams.
 20 Q. I see.
 21 A. Mainly to do with — a lot of the emphasis at that time
 22 was on sustainability and various schemes associated
 23 with that, carbon saving, the Green Deal came in at that
 24 sort of time, which was —
 25 Q. Yes.

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1 A. — you know, an energy efficiency scheme. So there was
 2 quite a lot of things going on, and it was something
 3 that I found interesting, so I decided to take up that
 4 role.
 5 Q. I see. Did that role, just to be clear, involve any
 6 involvement with the certification of products or
 7 approving certificates?
 8 A. Not directly, no. I mean, ultimately it had
 9 a connection, obviously, with the BBA's operational
 10 activities.
 11 Q. Yes.
 12 A. But it was more things looking to the future than the —
 13 sort of the general run of projects.
 14 Q. Yes, I see. All right.
 15 If we move down now, please, still looking at page 3
 16 of your witness statement {BBA00011087/3} to
 17 paragraph 10, you explain to us there that you left the
 18 BBA in December 2015 and moved to employment at the BRE;
 19 yes?
 20 A. Yes, that's correct.
 21 Q. Are you still employed at the BRE?
 22 A. I am indeed.
 23 Q. In what role, in summary? What does your role involve?
 24 A. In summary, I'm a senior certification project manager
 25 working in the security team at the BRE, so my role is

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1 mainly to do with testing and certification of physical
 2 security products.
 3 Q. I see. Does it involve the testing and certification of
 4 products in relation to fire at all?
 5 A. No, it — the team is — the focus is essentially
 6 entirely on security, either physical or electronic.
 7 Q. I see.
 8 All right, let's move on to your training. If we
 9 move down, now, please to paragraph 11 on page 4 of your
 10 witness statement {BBA00011087/4}, you explain there
 11 that when you first joined the BBA in 1986, there was no
 12 formal training; is that right?
 13 A. Yes, I think that's fair to say. There wasn't a formal
 14 sort of induction training that is more typical these
 15 days but, you know, that was 1986, so, yeah, that was
 16 probably fairly normal.
 17 Q. You say there that your knowledge of the
 18 Building Regulations developed over time and within your
 19 role at the BBA; yes?
 20 A. Yes, generally you'd build up knowledge in particular
 21 product sectors as you were introduced to them and as
 22 you gained experience, and effectively, I suppose, the
 23 training was mentoring by experienced members of staff.
 24 Q. Yes, I see.
 25 All right, let's look at that paragraph 12, where

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1 you're asked about any training you had in relation to
 2 the requirements of the Building Regulations for the use
 3 of combustible materials in buildings over 18 metres.
 4 You say there, just starting halfway through the
 5 first line:
 6 "Prior to my role as the Head of Approvals my
 7 knowledge on combustible materials would have been
 8 limited."
 9 Do you see that?
 10 A. Yes, I'm just ...
 11 Q. We're at paragraph 12 and I started reading just halfway
 12 along the first line, at the word "Prior".
 13 A. Yes, I've got it there.
 14 Q. You then go on to say, in summary, that you had access
 15 to a wealth of knowledge and a support structure around
 16 you, and ad hoc training on specialist subjects from
 17 other staff; yes?
 18 A. Yes.
 19 Q. Can I ask this: when you say, "Prior to my role as the
 20 Head of Approvals" your knowledge on combustible
 21 materials was limited, what about after that, when you
 22 stepped into the role of head of approvals of
 23 a department which included the certification of
 24 insulation products?
 25 A. Yes, so I — obviously it was a fairly steep learning

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1 curve. I did endeavour to learn as much as I could as
 2 the work permitted, really, and as we moved forward.
 3 Q. Yes. From whom did you learn, can you remember? Was
 4 there any particular person to whom you looked for
 5 advice or support?
 6 A. At that time, if I remember correctly, a lot of the
 7 focus internally at BBA, and externally, for
 8 fire-related expertise was the technical manager at the
 9 time, who I believe was Brian Haynes.
 10 Q. I see.
 11 A. So most of the knowledge embodied within BBA was Brian,
 12 and he would sort of look after that and he would be the
 13 first port of call, generally, for any issues on fire,
 14 and then he would generally, you know, either contact
 15 external contacts or suggest that the member of staff
 16 contacted somebody specific externally.
 17 Q. Yes.
 18 Did you consult Brian Haynes on fire in relation to
 19 any certificate during your time as head of approvals,
 20 do you remember?
 21 A. I would have thought so. I can't remember sort of
 22 absolute specific cases of that, but he — yes, anything
 23 fire-related that was — you know, that I wasn't sure
 24 about or I felt needed some more input, probably
 25 Brian Haynes would be the first port of call at that

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1 time.
 2 Q. Can you tell me, as head of approvals, so during your
 3 time in that role, what was your knowledge, if any, of
 4 the BS 8414 test series?
 5 A. At that time, I was certainly aware of the — of those
 6 standards. I think I knew some of the background, if
 7 you like, as to why they were there and, you know, what
 8 they were meant to do.
 9 Q. What did you understand that they were meant to do at
 10 the time?
 11 A. As a way of testing — a way of testing a façade,
 12 a façade fire scenario of a system rather than
 13 a component or a particular product, it was a way of
 14 testing an assembled installation. But I wouldn't
 15 pretend to know, you know, any great depth as to,
 16 you know, the intricacies of the standard.
 17 Q. I see. What about the criteria in BR 135?
 18 A. I think at the time I'd have been aware of that, and
 19 I probably would have read it at the time. I don't know
 20 how deep my understanding would have been at the time,
 21 and I can't at this point, sort of years later, I can't
 22 remember the detail. But certainly I would be aware of
 23 BR 135 and that it is referenced — you know, it was
 24 referenced within the Building Regulation approved
 25 document at that time.

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1 Q. Yes.
 2 Did you know, do you think, in the period that you
 3 were head of approvals, so 2007 to 2010, that test data
 4 from a test to BS 8414 had to be assessed against
 5 criteria in BR 135?
 6 A. I believe I would have done, yes, because they went
 7 hand-in-hand in that way.
 8 Q. Yes.
 9 Going back to what you said a few moments ago about
 10 Mr Haynes and his perhaps technical expertise, in 2007,
 11 when you began in your role as head of approvals, was
 12 Brian Haynes a qualified fire engineer, do you know?
 13 A. I don't believe — I'm almost certain he wasn't, and
 14 he — I'd worked with Brian for many, many years, really
 15 from the start of my career at BBA. I don't think he
 16 would ever have described himself as a — he certainly
 17 wouldn't have described himself as a fire engineer, and
 18 I don't think he ever would have really described
 19 himself as an expert, as a fire expert, I don't think.
 20 Q. Is it fair for me to say, then, that he had fallen into
 21 that role, in a way, of being consulted on fire at the
 22 BBA, despite perhaps not having the qualifications to
 23 call himself an expert in that area?
 24 A. Yes, I believe so. I suppose as a bit of background,
 25 perhaps, I think that that was something that tended to

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1 happen at the BBA at that time. You know, a lot of the
 2 work at BBA of project managers, you know, product
 3 assessors is a fairly generalist sort of role, because
 4 you're looking at a wide range of performance aspects.
 5 That is the nature of BBA certificates. So you — but
 6 you would build up expertise, you know, perhaps not
 7 formal qualifications, but certain individuals — and it
 8 wasn't a huge organisation at that time — would
 9 probably be, either willingly or unwillingly, given the
 10 mantle of the BBA authority, if you like, on that
 11 particular aspect of performance. I think Brian,
 12 whether he wanted — I don't know whether that was his
 13 choice, but I think he ended up occupying that space.
 14 Q. I see. That's helpful, thank you.
 15 I'm going to go on now to ask you about Kingspan
 16 and, in particular, the BBA's certification of their
 17 Kooltherm K15 insulation product.
 18 I want to look first with you, just briefly, at the
 19 first issue of the BBA's certificate for that product.
 20 If we can go, please, to {BBA00000038}.
 21 I'm going to come back to the look at the content of
 22 the certificate with you, Mr Hunt, but for now I just
 23 want to the look at the first page.
 24 If we look at the top right-hand corner, we can see
 25 that this is agrément certificate 08/4582, and we can

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1 see that it's for Kooltherm K15 rainscreen insulation
 2 board; yes?
 3 A. Yes.
 4 Q. If we go, please, to the bottom left—hand side of the
 5 document, we can see that the date of first issue is
 6 27 October 2008; yes?
 7 A. Yes.
 8 Q. We then see next to the date two signatures. The first,
 9 I think, is yours, is it?
 10 A. It is, yeah.
 11 Q. As head of approvals, physics. And then the second
 12 signature is that of Greg Cooper, who was the chief
 13 executive at the time.
 14 A. Yes.
 15 Q. Are these particular signatures included on the
 16 certificate because you and Greg Cooper, as chief
 17 executive, ultimately held responsibility on behalf of
 18 the BBA for this certificate and its content?
 19 A. Yes. This was a relatively — I think at that time
 20 there was a change in format of BBA certificates,
 21 I think around the same time as the larger approval
 22 teams were created. I think prior to that, I think the
 23 only signature that appeared on the certificates was the
 24 chief executive's. So this was a — something that came
 25 in at that time. So, yes, I think yes is the simple

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1 answer to that.
 2 Q. Yes.
 3 A. Now, quite how — in certification terms, you know, when
 4 you've got two signatures, one generally is sort of
 5 recommending certification and then the second one is
 6 the actual certification decision, final, you know,
 7 authority of issue.
 8 Q. Yes.
 9 Is it fair for me to say, just trying to understand
 10 what it denotes, that your signature there as head of
 11 approvals denotes that you have approved the certificate
 12 and its content for issue, in simple terms?
 13 A. Yes, I think it's, you know, recommending that that
 14 certificate can be issued.
 15 Q. Yes, all right.
 16 Can we go, please, to the third witness statement of
 17 John Albon, which is at {BBA00010751/8}. There is just
 18 something in that witness statement that I want to look
 19 at with you, Mr Hunt.
 20 So Mr Albon has provided to the Inquiry here a list
 21 of all those individuals that he says played some part
 22 in certificate 08/4582 for K15.
 23 If we go, please, to the very bottom of that page,
 24 we can see your name there on the left as head of
 25 approvals; yes?

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1 A. Yes.
 2 Q. If we go up on that table, back towards the top of
 3 page 8, please, we can see that the project managers he
 4 names are Simon Lloyd initially, and then the second
 5 name is George Lee, and we see in the next column
 6 "Project Manager (later, to completion)"; do you see
 7 that?
 8 A. Yes, I do.
 9 Q. We can go to it if we need to, but Mr Albon was also
 10 asked by the Inquiry in his witness statement who would
 11 have been responsible for checking the wording of this
 12 certificate, I'm going to call it issue 1 of the
 13 certificate for K15. His answer was that that
 14 responsibility lay with you. We can go to it if we need
 15 to, but do you agree with that?
 16 A. Yes, I think that would have been the — you know, the
 17 wording that would have ended up in the certificate
 18 would have been my responsibility to check, yes.
 19 Q. Yes. All right.
 20 In 2008, October 2008, which is when we've seen
 21 issue 1 was published, to whom did you report?
 22 A. I reported to the operations manager at the time.
 23 Q. And who was that?
 24 A. That was Martyn Reed.
 25 Q. I see. All right.

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1 Just for clarity, in fact, so that I don't confuse
 2 myself or anyone else, there were in fact two versions
 3 of issue 1 of the certificate for K15. Do you remember
 4 that?
 5 If we go, please, in fact, to your witness
 6 statement, so {BBA00011087/8}, we can see that the first
 7 issue, which I'm calling issue 1, is the one we've just
 8 looked at dated 27 October 2008. Do you see that? It's
 9 in the top line.
 10 A. Yes.
 11 Q. Then the next issue down is called "Amended Issue 1", it
 12 bears a date of 6 April 2010, and carries the same
 13 certificate number; yes?
 14 A. Yes.
 15 Q. Is it right for me to say, looking at the third issue
 16 down, issue 2 of certificate 08/4582, that was not
 17 published until 17 December 2013, you had no involvement
 18 in that certificate, did you?
 19 A. No, I'd changed role by that time.
 20 Q. Yes, so I'm going to focus on the top two certificates
 21 there, and I'm going to call them issue 1 and amended
 22 issue 1 so that I don't confuse matters.
 23 Can we look again very briefly at amended issue 1
 24 and that's at {BBA00000037}, please. It looks almost
 25 identical. We can see that it's certificate 08/4582 in

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1 the top right—hand corner; yes?
 2 A. Yes.
 3 Q. Then again, looking towards the bottom left—hand side of
 4 the page, we see, "Date of First issue:
 5 27 October 2008", but in much smaller letters under
 6 that, we can see the words:
 7 "Certificate amended on 6 April 2010 with revisions
 8 made to Scottish Building Regulations references, the
 9 Behaviour in relation to fire and Maintenance sections
 10 and deletion of the reference to Zurich Building
 11 Guarantee Technical Manual 2007."
 12 Yes?
 13 A. Yes.
 14 Q. We again see your signature and the signature of
 15 Greg Cooper, the chief executive at the time.
 16 A. Yes.
 17 Q. Can I take it from that, or is it right, that you also
 18 held ultimate responsibility for checking and approving
 19 the wording of this certificate, amended issue 1?
 20 A. Yes, I would have done so, and then the chief executive
 21 would have had — the chief executive would have had the
 22 authority to himself make comments or decline an issue
 23 of a certificate or request changes to it, but generally
 24 speaking, I think it's fair to say that that wasn't that
 25 common.

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1 Q. No.
 2 Would it be fair for me to characterise your role in
 3 terms of this certificate and issue 1 that we've just
 4 looked at as the person — were you the person
 5 responsible for the technical sign-off decision? Is
 6 that a fair characterisation?
 7 A. Yes, I believe so, yes.
 8 Q. All right.
 9 I'm going to ask you now some questions about the
 10 process of certification.
 11 If we can go back, please, to your witness statement
 12 at {BBA00011087/5}. You were asked there, if we look at
 13 the first question, number 4, in bold — do you see
 14 that? — it says:
 15 "In terms of the wording of final, issued
 16 certificates ..."
 17 Are you there, Mr Hunt?
 18 A. Yes, yes.
 19 Q. All right.
 20 The question was this, the first question at 4a:
 21 "Who, by reference to individuals and/or by
 22 reference to job titles, checks the wording, the overall
 23 meaning and the potential manner in which each section
 24 will be understood or interpreted?"
 25 So the question is being asked in quite a general

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1 way, not about these certificates in particular. Your
 2 answer at paragraph 17 is this, I'm going to read it
 3 with you:
 4 "From my recollection at the time it was internal
 5 and external commentators to which drafts had been
 6 circulated, generally including the Approvals Manager,
 7 Technical Manager, BBA Technical Writers, the client and
 8 finally the Chief Executive."
 9 Yes?
 10 A. Yes.
 11 Q. Could you just take that in stages, possibly. To the
 12 best of your recollection, and thinking about the period
 13 during which you were head of approvals, so 2007 to
 14 2010, first of all, looking at your answer in
 15 paragraph 17, by whom would drafts be circulated to the
 16 people in the roles you list there?
 17 A. Generally that was done by the — within the sort of the
 18 technical writers' function, although I think at that
 19 time it was being — the technical writers at that time
 20 had become embodied within the approvals teams, but
 21 there was still, if you like, a central BBA function for
 22 distribution of drafts and collation of comments on
 23 draft certificates.
 24 Q. Yes, I see.
 25 All right, let me wind back a little bit: who would

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1 produce the first draft of a new certificate?
 2 A. So generally, at that time, and I don't think it changed
 3 radically with the move to larger approvals teams, but
 4 generally speaking the draft of the certificate, the
 5 initial draft, would be prepared by the product
 6 assessor/project manager —
 7 Q. Yes.
 8 A. — usually in conjunction with a technical writer at
 9 that time, because the technical writers were embedded
 10 in the approvals team and were, if you like, part of
 11 that process of generating the initial draft
 12 certificates.
 13 Q. Yes, all right.
 14 So when a draft had been produced by a product
 15 assessor or project manager, perhaps with some
 16 assistance or some input from a technical writer — and
 17 we'll come on to that role — can you help us as to what
 18 would ordinarily be the involvement of the head of
 19 approvals in 2008? What would you do? Would a draft be
 20 circulated to you for your comments?
 21 A. Yes, I believe so at that time.
 22 Q. Was that always the case, for every certificate?
 23 A. I think there was a — again, if I remember right,
 24 you know, this was some time ago since I was involved
 25 with this process at the BBA, but I think at that time

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1 it wouldn't necessarily be in the first instance
 2 a formal circulation, it would be a relatively
 3 informal — within the team, the project manager,
 4 technical writer, come up with an initial draft. They'd
 5 probably at that stage share it with the approvals
 6 manager for some input, if necessary, at that stage. So
 7 it was still probably a relatively informal part of the
 8 drafting at that stage.
 9 Q. Yes, I was going to ask you about that. When you use
 10 the term "approvals manager", are you talking about
 11 yourself as head of approvals?
 12 A. Yes, I mean, I was talking about the general — so that
 13 would be the same process in any of the — I think there
 14 was three approvals teams at that time, so it would be
 15 the same process within each of those approvals teams,
 16 you know, with their own — looking at their own subject
 17 areas really.
 18 Q. Yes. So the project managers who worked under you,
 19 for example George Lee, do I have this right: he would
 20 perhaps put together a draft and then possibly
 21 informally send it to you for your comments; is that
 22 right?
 23 A. Yes, that's right, yeah.
 24 Q. And then later would come a stage where, on a more
 25 formal basis, a perhaps closer to being finalised draft

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1 was circulated more widely; is that fair?
 2 A. Yes, that's correct.
 3 Q. All right.
 4 So, I think, trying to cut to it, really, I'm trying
 5 to work out whether that is what happened on every
 6 single occasion, and perhaps the best way for me to ask
 7 it is this: was there ever an occasion where you as head
 8 of approvals received on your desk or your laptop
 9 a finalised draft certificate for approval, for checking
 10 and signing, without ever having seen a draft of that
 11 document previously or having commented on it? Does
 12 that make sense?
 13 A. I think so, yes. I think that's correct generally
 14 speaking, and I couldn't say for sure whether this was
 15 always the case in every situation, but my memory of the
 16 time, which, as I say, is a little while ago now, so
 17 I am aware that it could be slightly unreliable, but
 18 I think it would generally have been the case that the
 19 head of approvals would have seen a draft, an initial
 20 draft, certainly, you know, and probably several drafts
 21 before actually seeing the final thing.
 22 Q. Yes, I see, that's helpful.
 23 Can we go back to your witness statement, please, at
 24 page 5 {BBA00011087/5}, paragraph 20.
 25 Actually, at the question just above, so this is

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1 Inquiry question 5, you are being asked in particular
 2 there, I'll read it in fact:
 3 "In terms of the veracity and/or accuracy of test
 4 results cited within a BBA certificate:
 5 "a. Who, by reference to individuals and/or by
 6 reference to job titles, checks the wording, overall
 7 meaning ..."
 8 And so on.
 9 You say — essentially it's the same answer, in
 10 fact — the product assessor, technical writer,
 11 approvals manager, technical manager, the manufacturer
 12 and internal and external commentators if applicable.
 13 Just to ensure that I understand you, do you mean
 14 that each of those individuals, everyone in those roles
 15 that you have listed, would have checked the accuracy or
 16 veracity of test results cited in a BBA certificate?
 17 A. They would, yeah. Perhaps I need to split that up in
 18 a way.
 19 In terms of checking the accuracy of test results,
 20 that would generally have been done by the product
 21 assessor or the project manager, you know, maybe in —
 22 with the approvals manager. It might have involved the
 23 technical manager if it was deemed necessary. But then
 24 in terms of the wording — so that's the actual test
 25 results themselves.

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1 Q. Yes.
 2 A. In terms of checking the meaning of the wording, that
 3 could be a little bit wider, because a BBA certificate
 4 is — they're quite wordy things, rather than being
 5 a very short certificate which some certification
 6 obviously is, they're very wordy things, so in terms of
 7 checking the wording and the way that could be,
 8 you know, read, then obviously others would do that,
 9 although they might not be checking the actual test
 10 results.
 11 Q. Yes, I understand. So you said in that answer that
 12 checking the accuracy of test results would generally
 13 have been done by the project manager and maybe with the
 14 approvals manager; yes?
 15 A. Yes, yes, so did you say technical manager as well?
 16 Q. No, I think your answer was product assessor or project
 17 manager — and, yes, I'm so sorry, then you did say
 18 possibly involving the technical manager.
 19 My question really is this — and in fact it's been
 20 asked of you in your witness statement, at the next
 21 question down. The question there, at the very bottom
 22 of the page we're looking at under paragraph 20, is:
 23 "How are these checks carried out?"
 24 If we can go to your answer, please, which is over
 25 on page 6 {BBA00011087/6}, you say there:

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1 "By draft certificate circulation to the then
2 current BBA procedures."
3 You then are asked:
4 "Who has responsibility for the veracity and/or
5 accuracy of the tests results cited ...?"
6 And at paragraph 22 you say:
7 "Data was either internal BBA test data or UKAS
8 accredited, or subject to checking in accordance with
9 the then current BBA procedure."
10 My question is a very simple one, it's this: what
11 was the procedure for checking the accuracy or veracity
12 of test results cited in a BBA certificate? Whoever did
13 that, what was the procedure you're referring to here?
14 A. So at the time I think there was a — I couldn't tell
15 you the number of it or the — or a reference, but
16 I think within the BBA's documented procedures there was
17 a procedure for checking accuracy of test results.
18 Q. Yes, fine. What was it?
19 A. Oh, I'm sorry, I don't recall in detail. It was
20 a written procedure, mainly sort of it gave you a — it
21 gave you how you should check those results, you know,
22 based on the provenance of the data, whether it was UKAS
23 accredited or not, whether it was felt to be
24 representative of that product. There was quite
25 a number of different aspects to that procedure. But —

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1 Q. I see.
2 A. — I'm sorry, I can't remember what the reference number
3 of that procedure was at the time. It will be in the
4 BBA's manuals from that time.
5 Q. Fine. No, there is no reason you would remember the
6 reference number.
7 Would those procedures or the steps that you have
8 listed involve actually reading the test reports on
9 which the test results cited in a BBA certificate were
10 based?
11 A. Yes, yes, generally, yes.
12 Q. Would there be any other way to check the accuracy or
13 veracity of test data?
14 A. I think it would depend on the type of testing —
15 Q. Would it? How so?
16 Let me put it in this way: in what circumstances
17 could you check the accuracy or veracity of any test
18 data without reading it?
19 A. I think, yeah, the data would need to be read, yes.
20 Q. Yes, all right, thank you.
21 Just looking, please, at your answer at
22 paragraph 22, there is something I would just like to
23 make clear with you. You say there data, and this is
24 a reference to test data:
25 "... was either internal BBA test data ..."

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1 What does that mean? What would internal BBA test
2 data be?
3 A. So that — yeah, perhaps some explanation would be
4 helpful here. I'm sorry I didn't detail it more in my
5 witness statement.
6 At that time, I think it was fair to say that most
7 test data, particularly on a lot of aspects like
8 durability testing, you know, mechanical testing, a lot
9 of testing was actually done within the BBA's own
10 laboratories, and —
11 Q. I see.
12 A. — in that case the test data was generally taken to be,
13 you know, acceptable and accurate because it was
14 generated by the BBA themselves.
15 Q. Yes, I see.
16 And then UKAS accredited, looking again at
17 paragraph 22 of your witness statement, that means test
18 data from a UKAS accredited test house, does it?
19 A. Yes. So, if you like, there's a hierarchy of
20 acceptability, shall we say. Internal test data was
21 perhaps the easiest to accept. Failing that, then for
22 tests that were — the BBA didn't perform themselves, it
23 would be UKAS accreditation of the laboratory to the
24 standard that was of interest, would be the next step
25 down.

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1 Q. Yes.
2 A. Failing that, then there was some checking guidance,
3 I think, in the procedure, which was then also another
4 route to accepting data.
5 Q. Yes, I see. But in terms of the hierarchy of
6 acceptability that you have described, do I understand
7 you correctly to be saying this: if it was internal BBA
8 test data, it needn't be subject to further checks
9 because it was already your data; yes?
10 A. Essentially, yes, I think. I mean, there might have
11 been some caveats to that, if ... but I think generally,
12 yes, you know, it was BBA test data and therefore
13 generally accepted as being accurate.
14 Q. Yes. Then does the same apply to UKAS accredited test
15 data? Because it may just be the wording, but you say,
16 "Data was either internal BBA test data or UKAS
17 accredited, or subject to checking". So do I take it
18 from that that UKAS accredited test data was not subject
19 to checking?
20 A. I think it was still subject to checking that it
21 related — it was an appropriate standard and it related
22 to — and it related to the product in question. So —
23 but in terms of the actual accuracy of the data,
24 generally speaking UKAS accredited labs to the standard
25 that was of interest would be accepted —

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1 Q. Yes, I see.

2 A. — without further checking.

3 Q. Yes. All right.

4 I want to ask you now, please, about how decisions
5 about a certificate or test results to be included were
6 documented during the process of certification, and to
7 try to take that shortly.

8 If we can go again, please, to the third witness
9 statement of John Albion, which is {BBA00010751/5}, if we
10 look at paragraph 18, please, Mr Hunt, I'm just going to
11 read this with you, he says there:

12 "During the drafting process, the checks made, and
13 subsequent authorisations are documented on
14 a Certificate Traveller Log. The layout and style of
15 this document has evolved over time, but the principle
16 has always been to ensure that the responsibility for
17 all stages of the process is documented and that
18 a Certificate can only be issued after the content has
19 been checked and the publication formally authorised by
20 a suitably experienced and competent individual."

21 My first question is this: do you agree with him
22 that that was the principle in operation during your
23 time as head of approvals?

24 A. Yes, I believe so, that seems to accord with what
25 I think would have been the process at that time.

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1 Q. All right.

2 Before issue 1 of the certificate for K15, had you
3 at any stage had any prior involvement with Kingspan or,
4 in particular, with certification for any of their
5 insulation products?

6 A. I can't remember exactly. I think there was certainly
7 quite a number of Kingspan products, I believe, already
8 certificated at that time.

9 Q. Yes.

10 A. There would have been quite a number of Kingspan
11 products being — or assessment projects related to
12 Kingspan products I think at that time. You know, they
13 were a big manufacturer of construction products,
14 particularly in the insulation sector, and there would
15 have been quite a number, I think. I don't know what
16 that would have been exactly.

17 Q. No, I see, all right.

18 Mr Lee, George Lee, who we seem to have established
19 was the project manager for issue 1 of the K15
20 certificate, has told us in his witness statement —
21 I don't think we need to go to it — that most of the
22 Kingspan insulation products which were certificated by
23 the BBA at the time were being worked on by him.

24 So would you have been supervising his work on those
25 insulation certificates, other Kingspan products?

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1 A. In terms of — yeah, overall, in terms of the management
2 of the team, I would have been supervising him.

3 In terms of perhaps a technical capacity — now,
4 I don't know about formal competence and whether that
5 comes up, but he had — was much more experienced than
6 I was in terms of experience of insulation products and
7 the assessment and testing of those than I would have
8 been.

9 Q. What leads you to say that he was much more experienced
10 than you were in those areas?

11 A. He'd — he was in the previous section headed up by
12 Sonia Marshall, which was the BBA's sort of, if you
13 like, insulation and ventilation section. So the —
14 they dealt with really all those products up until that
15 time. So until the combination of the approvals teams,
16 the project managers that came across from that team
17 were the ones with the experience of insulation
18 products, and I think probably at that time George would
19 have been — Sonia Marshall retired, I can't remember
20 exactly when that was, but that would have been probably
21 around that time.

22 Q. I see.

23 A. So George was the, if you like, most experienced on
24 insulation products. Now, I don't know how that would
25 be defined in formal competence terms.

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1 Q. No, all right, that's helpful.

2 Can you remember when you first became aware that
3 a certificate was going to be prepared for Kingspan's
4 K15 product?

5 A. I think — well, I would have — when I became the head
6 of approvals and the projects that were on the books, if
7 you like, in the — in Sonia's section, that was one of
8 the projects that would have come across, and I believe
9 it had already been going some time before then. So,
10 yeah, I guess the awareness would have been at the time
11 when the new approvals team, as it were, were formed and
12 the projects were already on the books, shall we say.

13 Q. Yes. I think that's right, that it was an ongoing
14 project at the time you became head of approvals in
15 2007, and we'll come on to look at some correspondence
16 about that.

17 Did you see, given that it was an ongoing project,
18 a contract or agreement between the BBA and Kingspan in
19 respect of a certificate for K15 at any stage?

20 A. I can't be absolutely sure of that, because at that time
21 a lot of stuff was still on paper, I think, so there
22 would have been — obviously there would have been
23 a file with the contract on. Whether I would have
24 looked at it when the files were sort of handed over, as
25 it were, I can't recall.

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1 Q. All right.
 2 A. I didn't have any involvement obviously with the
 3 production or review or acceptance of that contract.
 4 That was —
 5 Q. All done?
 6 A. Yeah, it was a few years, I think, before I was
 7 involved.
 8 Q. Yes, all right.
 9 When did you first discuss the matter, a certificate
 10 being prepared for K15, with a project manager? Can you
 11 remember that?
 12 A. I believe it would have been with George Lee.
 13 Q. Yes.
 14 A. I can't remember when it would have been. It may have
 15 been fairly early on when the approvals teams was
 16 formed. At some stage I would have become in knowledge
 17 of it but I couldn't say when.
 18 Q. All right.
 19 Were there, as far as you remember, before you came
 20 to the stage of reviewing the certificate for approval,
 21 discussions or meetings between you and George Lee as to
 22 any aspect of the content of the certificate?
 23 A. I would have thought so, but I can't recall anything
 24 specific. Generally, with most projects, the project
 25 manager/products assessor would have ongoing

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1 conversations with the head of approvals as a day-to-day
 2 thing.
 3 Q. All right.
 4 What documents did you have available to you when
 5 you came to the stage of reviewing issue 1 of the BBA's
 6 certificate for K15 for approval?
 7 A. I can't remember exactly from memory, but it would have
 8 been essentially whatever was in the technical file plus
 9 any, I don't know, notes or other material that there
 10 might have been. But essentially what was in the
 11 technical file.
 12 Q. So ordinarily, when you came as head of approvals to the
 13 stage of actually reviewing a certificate for approval
 14 and signature, is that what you would ordinarily expect
 15 to have in front of you, the contents of the technical
 16 file and any other notes or materials, I think you said?
 17 A. Yes, yes, plus any discussions or meetings or, you know,
 18 knowledge that I may have had at that time.
 19 Q. Yes. What about correspondence with the manufacturer?
 20 Would you expect that to be on the file?
 21 A. I don't — correspondence at that time wouldn't
 22 necessarily — some of the correspondence — certainly
 23 letters would have been on the file at that time.
 24 Emails, perhaps emails, perhaps printed copies of
 25 emails, but not necessarily every email, I don't think,

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1 at that time. That may have changed at BBA
 2 subsequently. My experience obviously only goes so far.
 3 MS TROUP: Mr Hunt, I'm going to pause you there, just
 4 because I'm looking at the time, and wondering, passing
 5 back to the Chairman, whether this might be
 6 an appropriate time for a short break.
 7 SIR MARTIN MOORE-BICK: Yes, I think it probably would,
 8 wouldn't it, Mr Hunt?
 9 We'll have a short break now. I think we could
 10 start again at 3.45, please. While we're having our
 11 break, please don't talk to anyone about your evidence
 12 or anything relating to it. All right?
 13 THE WITNESS: I understand.
 14 SIR MARTIN MOORE-BICK: Very good, thank you, and we will
 15 see you at 3.45.
 16 THE WITNESS: Thank you.
 17 SIR MARTIN MOORE-BICK: Good, thank you very much.
 18 THE WITNESS: Thank you.
 19 (3.32 pm)
 20 (A short break)
 21 (3.45 pm)
 22 SIR MARTIN MOORE-BICK: Welcome back, everyone. We're now
 23 going to resume hearing from Mr Hunt, so I'm just going
 24 to check that Mr Hunt can see me and hear me all right.
 25 Are you there, Mr Hunt?

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1 THE WITNESS: I am indeed, sir, yes.
 2 SIR MARTIN MOORE-BICK: You are ready to carry on, I hope.
 3 THE WITNESS: I am.
 4 SIR MARTIN MOORE-BICK: Good. Thank you very much.
 5 Well, in that case, Ms Troup, when you're ready.
 6 MS TROUP: Thank you.
 7 Mr Hunt, I'm going to take you back to your witness
 8 statement, if we can go to that, please, at
 9 {BBA00011087/8}. If we look, please, at paragraph 31,
 10 we can see that you have been asked when it was that
 11 Kingspan first contacted the BBA in relation to the
 12 potential certification of K15. Do you see that
 13 question?
 14 A. I do, yes.
 15 Q. You say that you don't remember, but that you have been
 16 shown an email dated 23 October 2003 which would appear
 17 to indicate first contact; yes?
 18 A. Yes.
 19 Q. Let's go to that email, please. That's at
 20 {BBA00011088}.
 21 If we look at the top email, if we could blow that
 22 up a little bit, please, we can see an email from
 23 Ivor Meredith of Kingspan to Bob Keyse at the BBA, and
 24 it's dated Friday, 24 October 2003; yes?
 25 A. Yes.

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1 Q. We can see that the subject is "Possible New BBA
2 Assessment", and he's attached some pdfs, one about
3 Kooltherm K15 and one about a Thermafloor product, TF70.
4 Do you see that?
5 A. I do, yes.
6 Q. Then if we look at Mr Meredith's email, he says this:
7 "Bob,
8 "As requested by Philip please find enclosed the
9 TF70 literature. The same situation applies to our K15
10 which is the same specification as K8 and K7. Could
11 [you] also provide a quote and timescale for this."
12 Yes?
13 A. Yes.
14 Q. Were you shown this email in the course of preparing
15 your witness statement for the Inquiry, or is it
16 an email that you think you saw at the time, in 2007 or
17 2008?
18 A. I don't remember it — I don't remember seeing it at the
19 time in 2007/2008. Yes, I believe it's the email that
20 I saw recently, you know, when doing the witness
21 statement.
22 Q. Yes. And do you think it's right for me to take from
23 this that the products Mr Meredith mentions in the
24 second line of his email, K8 and K7, were at that time,
25 in 2003, already the subject of BBA certificates?

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1 A. They may have been. I can't recall fully from the time.
2 But it sounds likely from that, but I'm speculating.
3 Q. All right.
4 Do you know whether, after this email from
5 Mr Meredith, Kingspan were at any stage asked to provide
6 any data or evidence to back up what Mr Meredith says
7 there, which is that K15 is the same specification as K7
8 and K8?
9 A. I don't remember. I can't remember if I've seen
10 anything. I think —
11 Q. Would you — sorry, go ahead.
12 A. Oh, sorry.
13 Q. No, no.
14 A. I was just going to say that they — it would have —
15 once there was — once the BBA was in contract, I think,
16 or maybe prior, it is possible, I think at the time
17 Simon Lloyd would have been the initial project manager
18 and Sonia Marshall would have been involved. What they
19 saw at the time or what was taken on — what was seen
20 before the contract was prepared, I wouldn't know.
21 Q. All right, let me put it in this way: would you expect
22 more to have been done by the BBA than for
23 Ivor Meredith's word on this that K15 was the same
24 specification as K8 and K7 — would you expect more to
25 have been done than for that to have been accepted at

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1 face value?
2 A. I think normally, I'm talking sort of, you know, from my
3 own experience, I don't know for sure in this instance,
4 but I — generally I think that would — that begs the
5 question and would be explored in some way, whether that
6 would be verbally, you know, a phone call or emails or
7 meeting or — generally, yes, it would be explored.
8 Q. I see, all right.
9 Can we go now very briefly to a copy of the contract
10 which was signed between the BBA and Kingspan for the
11 certification of K15. That's at {BBA00010745}.
12 We can see there on the cover page, it's
13 "Certificate contract", and the applicant details are
14 given at the top, that's Kingspan; yes?
15 A. Yes.
16 Q. There are then some details of the subject of the
17 contract, addresses and relevant fees.
18 If we go on, please, to page 4 of this document
19 {BBA00010745/4}, we can see that it's been signed in
20 August 2004 on behalf of the applicant, that's the top
21 signature, and we know that signature to be that of
22 Ivor Meredith of Kingspan.
23 Do you know who it is that has signed on
24 16 August 2004 on behalf of the BBA?
25 A. Yes, I think I do. I believe, looking at that

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1 signature, I think that was a gentleman called
2 John Miles who worked in the — I think at the time it
3 would have been called the marketing or sales and
4 marketing department.
5 Q. I see, all right.
6 Now, given that this certificate was signed off by
7 the BBA on 16 August 2004, and that we know that issue 1
8 of the certificate bears the date 27 October 2008, it
9 seems that the process of getting to an issued
10 certificate took just over four years; yes?
11 A. Yes.
12 Q. Do you have any idea why that was?
13 A. I mean, that is quite — it is a long time. I don't —
14 I can't recall — and it's generally longer than would
15 be expected for this type of assessment at that time.
16 Q. I see.
17 A. I don't recall, you know, what the circumstances were
18 before I was involved —
19 Q. No.
20 A. — but I think it's probably fair to say, and I don't
21 know the exact numbers, but at the time when
22 Sonia Marshall retired and I became approvals manager,
23 there was quite a backlog of work. It was — there was
24 a lot of work in the insulation sector had come in, and
25 I think there was a lot of the work on the books, if

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1 I remember rightly.
 2 Q. When you stepped into the role of head of approvals?
 3 A. Yes.
 4 Q. All right, I see. So then one of your first jobs,
 5 presumably, was to work through that backlog?
 6 A. Yes, indeed. I think — I don't know if this background
 7 is useful or not, but from memory at the time, I think
 8 one of the rationales between creating three larger
 9 approvals teams rather than a larger number of smaller
 10 sections was mainly business efficiency and to try and,
 11 you know, I mean, to put it bluntly, get through the
 12 work and, you know, keep things moving.
 13 Q. Yes, I see. All right.
 14 In 2008, when you were head of approvals, were
 15 records kept recording who had contributed to
 16 a certificate and in what way?
 17 A. Not formally, I don't think, other than names appearing
 18 on the file —
 19 Q. Yes.
 20 A. — the technical file, and so signatures on things like
 21 contracts and documents. I think — correspondence,
 22 obviously. I don't think there was a formal log as such
 23 kept. It would mainly be from those whose names were
 24 involved and come up in that way.
 25 Q. All right.

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1 We spoke earlier or I referred you earlier to
 2 a section of John Albon's third witness statement where
 3 he mentioned a document called the certificate traveller
 4 log. I want to look at that with you for the log for
 5 issue 1 of K15. That is at {BBA00011090}, please.
 6 Right, so we see at the top "Certificate traveller
 7 log", and this has been filled out manually; yes?
 8 A. Yes.
 9 Q. What is the purpose, or what was the purpose, please, in
 10 2008, of a certificate traveller log?
 11 A. I think it was, if I remember rightly — this, in this
 12 format, was relatively new to the — for the — when the
 13 new approvals teams were created.
 14 I think there was something similar in place before
 15 then, but I can't remember exactly how it differed from
 16 this, and I think it was — this was, if I remember
 17 correctly, put into place just as a way of sort of
 18 keeping track of where draft certificates had got to,
 19 who'd, you know, done what on those drafts and just to
 20 record those steps.
 21 Q. I see. All right.
 22 Well, let's take a look at this one together. We
 23 can see that the product name in the top line is given
 24 as "Kooltherm K15 rainscreen insulation board", and then
 25 under that we see details for Kingspan Insulation.

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1 On the right-hand side, the contact name at Kingspan
 2 is given as Gareth Mills. Do you see that?
 3 A. Yes, I do, yes.
 4 Q. That's the right-hand side. Then under that, I think we
 5 see, next to "Project Manager", George Lee.
 6 A. Yes.
 7 Q. And then Richard Ball is recorded as the technical
 8 writer; yes?
 9 A. Yes.
 10 Q. This is something you referred to earlier, but I want to
 11 check it with you.
 12 Despite the title, technical writer, is it correct
 13 for me to say that the role did not in fact involve any
 14 technical input into the content of certificates?
 15 A. Yes, in general terms, yes. It did — so technical not
 16 in terms of being — having any technical responsibility
 17 for the technical judgements, if you like.
 18 Q. Yes.
 19 A. But they did have quite an input in the format of the
 20 certificate, the way that the Building Regulations were
 21 referenced in a sort of standard way.
 22 So they had quite a lot of input into the process,
 23 but not with a technical responsibility, but with
 24 a responsibility, I suppose, of ensuring the consistency
 25 and the —

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1 Q. Yes.
 2 A. — readability, I suppose, of the certificates and they
 3 followed a consistent format, because that was always —
 4 you know, could be an issue in — for certificates.
 5 Q. Yes.
 6 Mr Hunt, the way John Albon puts it in his third
 7 witness statement — and we can go to this if we need
 8 to — is, "Input is restricted to maintaining
 9 a consistent BBA style and correct grammar, no technical
 10 input or discretion"; does that accord with your
 11 recollection of that role, technical writer?
 12 A. Yes, I think essentially, yes. Some might have had more
 13 input than others. Some of them were quite experienced,
 14 so had — you know, were quite good at picking up
 15 anomalies or even — they had no responsibility
 16 technically, but often they were part — they were
 17 certainly part of the process of kind of getting
 18 certificates in good order, as it were.
 19 Q. Looking back, please, at the log, in the top section, do
 20 you see on the right-hand side, under the names we've
 21 just looked at, there is a section in brackets starting
 22 "Jobcon FS", do you see that?
 23 A. Yes, I do.
 24 Q. If we read along the handwritten section there, I think
 25 it gives the department, which is yours, physics, and

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1 then the contract number or agreement number, and then
 2 does that say "9 drafts" at the end of that line?
 3 A. I believe so, yes, I think I would read that as
 4 "9 drafts".
 5 Q. Does that indicate to you, looking at it now, that there
 6 were nine drafts of the certificate for K15?
 7 A. No, if I remember correctly, and I'm hoping I do, but
 8 I think within the electronic folders on the network
 9 drive it — so I think there was various folders within
 10 that project, overall project folder, and I think
 11 section or folder number 9 was drafts.
 12 Q. Oh, I see.
 13 A. I don't think it implies the actual number of drafts,
 14 I think it implies the folder number within the main
 15 project folder.
 16 Q. Yes, I see, thank you.
 17 If we go down now, please, to section 1,
 18 "Certificate Details", we can see there that the word
 19 "Standard" has been circled. Do you see that?
 20 A. Yes, I do.
 21 Q. What does that mean?
 22 A. I think that the BBA at that time had various series of
 23 certificates. So most certificates were standard BBA
 24 agrément certificate. HAPAS was to do with highways
 25 work, I think.

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1 Q. Right.
 2 A. Roads and bridges again was specific to sort of civil
 3 engineering work.
 4 Q. Yes.
 5 A. And then ETA, as I think we mentioned, you know, we
 6 spoke about earlier, is European technical approval.
 7 Q. Thank you.
 8 Then moving down, please, can you see at section 1.4
 9 "Circulation Type", the word "Follower" has been
 10 circled?
 11 A. Yes.
 12 Q. And after that we see the words:
 13 "Designated Leader Certificate No 08/4549."
 14 A. Yes.
 15 Q. What does the word "Follower" being circled denote?
 16 A. Oh, okay. So I think at the time it was ... so it
 17 depends on the route of the circulation route that
 18 a certificate went on, and I think it could be adjusted
 19 as well, but I think essentially a leader certificate
 20 went to — on a wider circulation of commentators,
 21 whereas a follower was a restricted number of people,
 22 and it was because it wasn't deemed, if you like,
 23 necessary to send it on the wider route.
 24 Q. Yes, all right.
 25 Then staying with section 1.4, I think that is your

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1 signature, is it, dated 19 June 2008?
 2 A. Yes.
 3 Q. Yes?
 4 A. Sorry, yes, I cut across you then. Yes.
 5 Q. No, no. All right.
 6 If we move down, please, to section 2 in this log,
 7 we can see a section entitled "Technical completion of
 8 Assessment", and it reads:
 9 "Declarations that Certificate is technically
 10 complete (initials and date)."
 11 The project manager there has signed. Do you know
 12 whose signature that is?
 13 A. So project manager ... I believe that was George Lee,
 14 but it's not — you know, I can't be 100% sure because
 15 it's not ever so legible.
 16 Q. Right.
 17 Then we see the technical writer, and that seems to
 18 read "R Ball" for Richard Ball, and then is that your
 19 signature, head of approvals, at the third line?
 20 A. Yes, it is.
 21 Q. Yes.
 22 Is it right for me to say that, by signing this
 23 document, you were essentially signing off to say that
 24 you were satisfied that all the specifications within
 25 the certificate were accurate?

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1 A. I believe so, yes, at the time, in the procedure that
 2 was in place then, as far as I can remember.
 3 Q. And that all data requested by Kingspan had been
 4 provided?
 5 A. Yes, I think that would be the assumption, yeah.
 6 Q. And that all supplied test data had been scrutinised by
 7 the BBA?
 8 A. Essentially, yes, I believe so.
 9 Q. And that all technical content had been checked as
 10 adequate and accurate?
 11 A. Yes, again, I think that's — that was the assumption
 12 there, yes.
 13 Q. All right.
 14 I want to go now, please, in some more detail to
 15 issue 1. If we can go back to {BBA00000038}, please,
 16 and if we look at page 1, looking at "Product scope and
 17 summary of certificate", which is in the first light
 18 blue box at the top of the page, we can see that that
 19 reads:
 20 "This Certificate relates to Kooltherm K15
 21 Rainscreen Insulation Board, a rigid phenolic board with
 22 foil composite facings, for use as external thermal
 23 insulation on new and existing steel frame or masonry
 24 walls. The board is used in domestic and non-domestic
 25 buildings in conjunction with masonry or weathertight

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1 ventilated cladding systems."
 2 Does that accord with your understanding of K15 as
 3 a product at the time, as far as you can recall, that
 4 description?
 5 A. Yes, as far as I can recall, yes.
 6 Q. What did you know about K15 at the time, whilst it was
 7 being certificated?
 8 A. I think — I mean, I knew it was part of the Kooltherm
 9 range of phenolic boards and there was quite a family of
 10 those for various applications. I think some of them
 11 were already certificated, but I think as I mentioned
 12 earlier, I can't remember exactly which ones, and in
 13 which use.
 14 Q. All right.
 15 A. Is that enough?
 16 Q. Yes, thank you.
 17 Let's move down now, please. Do you see the second
 18 heading in bold which reads "Key factors assessed"? So
 19 just going down the page a little, do you see those
 20 words, "Key factors assessed"?
 21 A. Yes, I do, yeah.
 22 Q. First we have "Thermal performance" in bold, and then
 23 "Condensation risk", and then the section I want to take
 24 you to is "Behaviour in relation to fire"?
 25 A. Yes.

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1 Q. That reads:
 2 "The boards will not contribute to the development
 3 stages of a fire or present a smoke or toxic hazard ..."
 4 Looking at the first part of that assertion, "The
 5 boards will not contribute to the development stages of
 6 a fire", my simple question is this: what does that
 7 phrase mean?
 8 A. I think I would read it as it is there, but I don't
 9 know ... I don't know if it had any more — if there was
 10 intended to be any meaning to it other than that it
 11 won't contribute to the development stages of a fire,
 12 but it's a slightly — well, perhaps a slightly
 13 ambiguous statement.
 14 Q. Yes. Why do you say that it's slightly ambiguous
 15 perhaps?
 16 A. I'm not quite sure, you know, in the context of — in
 17 the sort of context of the approved documents, I'm not
 18 quite sure what it would mean. I mean, BBA certificates
 19 don't only cover Building Regulations requirements as
 20 such, but I think it was probably meant to mean that,
 21 you know, it doesn't contribute to the early stages of
 22 a fire.
 23 Q. Right. Do you think that was your understanding at the
 24 time that you signed off this certificate, that it was
 25 essentially intended as read, "The boards will not

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1 contribute to the early stages of a fire"?
 2 A. One thing that, you know, having obviously not really
 3 looked at it for many years until recently, and then
 4 looking at it for the Inquiry —
 5 Q. Yes.
 6 A. — I'm not quite sure — it's just as a — I don't know
 7 if this is okay, but just as a bit of context or
 8 background, this "Key factors assessed" was a
 9 relatively — the format of the certificate was changed
 10 around that time or not too long before this time, and
 11 that was — this "Key factors assessed" was added in as
 12 a new feature of the format, and it was meant to be sort
 13 of a few little quick bullet points.
 14 But I don't — thinking about it now, I'm not sure
 15 in a way how helpful it was or is in that, you know,
 16 elsewhere in BBA certificates it usually says somewhere,
 17 and I can't remember exactly where, that certificates
 18 should always be read in their entirety.
 19 Q. Yes.
 20 A. So it's almost we've shot ourselves in the foot,
 21 perhaps, by sort of having a summary, and that may lead
 22 people to not read the full certificate.
 23 SIR MARTIN MOORE-BICK: Forgive my jumping in, Mr Hunt, and
 24 you too, please, Ms Troup. But someone actually sat
 25 down and chose those words, I imagine. Are we to

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1 understand from your earlier evidence that that was
 2 probably Mr Lee?
 3 A. I would — to the best of my knowledge, I believe so,
 4 sir, yes.
 5 SIR MARTIN MOORE-BICK: So he chose those words. Whether he
 6 was helped to choose them by anything else we may
 7 discover at a later stage. But my next question is: you
 8 then, at some point, read this certificate; is that
 9 right?
 10 A. Yes.
 11 SIR MARTIN MOORE-BICK: Did you scrutinise those words? In
 12 other words, did you read them and ask yourself: what
 13 does this mean?
 14 A. I don't remember exactly how I read them at the time.
 15 Reading them, you know, now, I'm not quite sure exactly
 16 why it was there, because normally that "Key factors
 17 assessed" summary would be a repetition, you know,
 18 albeit briefly, of something that appears in the main
 19 section of the certificate. So it's slightly unusual,
 20 I would say, and probably not that helpful that the
 21 wording in the "Key factors assessed" is not mirrored in
 22 the main section. So —
 23 SIR MARTIN MOORE-BICK: I understand that. My question was:
 24 did you scrutinise them and ask yourself: what does this
 25 mean? I think your answer is you can't remember doing

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1 so. Is that right?

2 A. Yes, I think — I mean, I would have read it and

3 scrutinised it at the time. I can't now remember what

4 my thoughts were on that, and whether I read anything

5 into that particularly, other than that you then needed

6 to refer to section 7 to get the full story.

7 SIR MARTIN MOORE-BICK: All right. Well, that I understand.

8 It's quite a long time ago.

9 All right, thank you. That's helpful.

10 Ms Troup, on you go.

11 MS TROUP: Thank you.

12 I think I understand you to be saying that you don't

13 remember what your reaction was to that particular

14 wording at the time but that you would have looked at

15 it.

16 Do you think you understood it at the time?

17 I appreciate you're saying it may have been intended to

18 be a reference to other sections within the body of the

19 certificate, but that aside, taking those words just as

20 they look on the front page, do you think there is

21 anything you could have understood about the meaning of

22 them in 2008 that you cannot see now?

23 A. In what way? Sorry.

24 Q. Well, let me put it in this way: as far as you are

25 aware, is that wording derived from any particular test

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1 standard or guidance or part of the

2 Building Regulations?

3 A. I don't believe — my — you know, I can't remember

4 exactly what I would have taken from it at the time, but

5 I think at the time and now I wouldn't necessarily take

6 that as being any particular reference or any

7 significance to the actual wording of the approved

8 documents.

9 Q. No.

10 How is contribution to the development stages of

11 a fire measured, do you know?

12 A. Not that I can recall, no, not in any detail, I couldn't

13 say.

14 Q. No.

15 Are you able to assist with what would need to be

16 done in order for a definitive statement saying "The

17 boards will not contribute to the development stages of

18 a fire" to be correct? How would that be shown?

19 A. I'm afraid I'm not sure.

20 Q. No.

21 Do you have any idea what the scientific or

22 evidential basis for that statement could have been?

23 A. I don't for sure, no. I would imagine it was based on

24 some of the testing and assessment that was in

25 section 7. But —

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1 Q. Well —

2 A. — reading it now, I think it confuses more than helps.

3 Q. Yes. We'll come on to section 7.

4 Let me ask you this: you were asked in your witness

5 statement about your understanding at the time when you

6 approved this certificate of the words "limited

7 combustibility". We can take a look at it if we need

8 to, but you were simply asked what you understood those

9 words to mean in 2008, and your answer was, "I recall it

10 was related to a definition in Approved Document B".

11 Actually, perhaps we ought to look at it. That's in

12 your witness statement, please, at page 9, so

13 {BBA00011087/9}, and it's at Inquiry question 22:

14 "What was your own understanding of the meaning of

15 the phrase 'limited combustibility'?"

16 Your answer is:

17 "I recall it was related to a definition in Approved

18 Document B."

19 Can you go any further with that answer now?

20 A. Yes, I think I can. At the time when I did my witness

21 statement, I'd not thought about K15 for many years and

22 it came a little bit out of the blue, and I was

23 struggling to recall detail. I think more — obviously

24 more recently, having heard some of the other witnesses

25 and being a little bit more steeped in the Inquiry,

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1 you know, I have had a look back at Approved Document B

2 from the time, and, you know, it is — I think it is

3 a defined term within Approved Document B, and I think

4 it is defined in one of the appendices, but I can't

5 remember which appendix it is.

6 Q. Yes, fine.

7 Do you think you would have understood what the

8 definition of "limited combustibility" was in 2008

9 whilst you were head of approvals?

10 A. I believe so, yes. I mean, I can't be absolutely

11 certain what my, you know, depth of understanding was of

12 limited combustibility at the time, but I think I would

13 have known it and recognised it as a defined term.

14 Q. Yes.

15 Do you think at the time you had a good or sound

16 understanding of fire performance as dealt with in

17 Approved Document B?

18 A. I don't — you know, I wouldn't have claimed then or now

19 to be any sort of expert on fire performance. I would

20 have looked at the relevant parts of Approved Document B

21 at the time, I would have some understanding of the

22 provisions there.

23 Q. Right.

24 A. I wouldn't say I had an in-depth understanding, no.

25 Q. All right.

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1 What was your understanding in 2008, at the time you
 2 approved issue 1 of the certificate for K15, of the
 3 combustibility or otherwise of the K15 product?
 4 A. I think at the time I would have understood that it's
 5 not a — that it wasn't a non-combustible product or
 6 a product of limited combustibility.
 7 Q. Right.
 8 A. I think I would have — again, I can't — it's so long
 9 ago, I can't remember exactly what my thought would have
 10 been, but I don't think I would have thought of it in
 11 that way.
 12 Q. No. It's understandable, it was some time ago.
 13 Just to be clear, is your evidence that you did
 14 understand in 2008 that K15 was a combustible phenolic
 15 insulation material?
 16 A. I would have — I believe so, yes. I know that,
 17 you know, combustibility is a scale of — you know,
 18 you've got non-combustible at one end and then you've
 19 got —
 20 Q. Yes.
 21 A. — this isn't a defined term, very combustible at the
 22 other end. So most products would lie somewhere
 23 within — on that spectrum, I think.
 24 Q. Yes. Understood.
 25 Your answer was, "I believe so, yes", so just to be

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1 absolutely clear, you did understand that K15 was
 2 combustible?
 3 A. I believe so, yes, a combustible in some — to some
 4 degree, yes.
 5 Q. All right.
 6 That being the case, can you help me to understand
 7 how it could possibly be accurate to state in
 8 a BBA certificate for that product, "The boards will not
 9 contribute to the development stages of a fire"?
 10 A. I think at the time my understanding would have — or my
 11 reading of that would have been that the — you know, if
 12 it — it's not non-combustible, but it wouldn't be one
 13 of the initial sources of the fire, it wouldn't be
 14 something that burnt readily at the very start of the
 15 fire. You know, once a fire is established, it may then
 16 obviously be part of that, but development — I think
 17 I probably read it as development would be the very
 18 early stages. But I can't be sure exactly how I read
 19 that at the time.
 20 Q. No, I'm not really asking you too much about how you
 21 read it at the time. Perhaps we will come back to that
 22 answer. What I'm trying to understand from you, in very
 23 simple terms, is this: if you knew the product to be
 24 a combustible material, how could it be accurate to
 25 state in definitive terms, without qualification or

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1 caveat, "The boards will not contribute to the
 2 development stages of a fire"?
 3 It doesn't say, as you've just been through, "It
 4 might not burn readily at the beginning of a fire or
 5 perhaps once a fire is established it might", it says,
 6 "The boards will not contribute to the development
 7 stages of a fire". How could that possibly be accurate
 8 in relation to a combustible product?
 9 A. I — again, I think it might depend — you know, I think
 10 I thought — would have thought it would depend on the
 11 degree of combustibility of the product. So I think
 12 obviously my thinking at the time would have been that
 13 buildings contain a lot of different products, many of
 14 which are combustible. Some products will contribute
 15 more to the development of a fire than others. I think
 16 I took that to mean that it wasn't a product that was
 17 very combustible and would contribute to the early
 18 stages of the fire. I think in my mind, development
 19 probably meant early stages, perhaps, rather than later
 20 stages. But I'm — in saying that, I'm not, you know,
 21 a fire expert and that may not be correct.
 22 Q. No.
 23 Did you ever ask George Lee what the source of or
 24 basis for that wording was? You appear, and I may be
 25 wrong, but I have the impression that you made a number

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1 of assumptions about what it might have meant.
 2 Did you ever simply go to the project manager who
 3 had written it and say, "What does this mean?"
 4 A. I may well have done. I don't recall a conversation
 5 along those lines.
 6 Q. I see.
 7 A. But I — it's quite likely that I would have done, yes,
 8 and I can't remember whether that did occur and what his
 9 answer was.
 10 Q. No, fine.
 11 If that did occur, it must be the case, mustn't it,
 12 Mr Hunt, given that you later signed off that wording,
 13 that he gave you some sort of satisfactory answer as to
 14 the source of or basis for that wording?
 15 A. I would believe so, yes.
 16 Q. Do you have any idea now what that could be?
 17 A. No, I don't, I'm sorry.
 18 Q. No.
 19 Can you accept that in fact, given that K15 is
 20 neither non-combustible nor a material of limited
 21 combustibility, that wording is in fact misleading and
 22 inaccurate?
 23 A. I think it could potentially be read as misleading,
 24 knowing what I know now.
 25 Q. In what circumstance —

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1 A. At the time, I don't — perhaps I probably wouldn't have
 2 necessarily picked that up.
 3 Q. In what circumstances could it not be read as misleading
 4 or inaccurate?
 5 A. I think if it related to some of the content in
 6 section 7, if it was something that could be taken from
 7 some of the testing described there.
 8 Q. I see. Well, we'll come on to section 7.
 9 I'm sorry, a few moments ago I did speak over you
 10 and I apologise for that. You started to answer. You
 11 said:
 12 "I think it potentially could be read as misleading,
 13 knowing what I know now."
 14 I'm a little confused by that answer because, as
 15 I understood it, you knew at the time that the product
 16 was combustible.
 17 What do you know now that leads you to say that
 18 could potentially be read as misleading?
 19 A. Oh, okay. I think probably at the time I wouldn't have
 20 read any great significance into that statement.
 21 Q. Why not?
 22 A. I think again because — and, as I say, rightly or
 23 wrongly — I think in my mind it was — I didn't think
 24 that K15 was a non-combustible product, but I didn't
 25 think that it would have a big contribution to the

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1 development of the fire. That may be —
 2 Q. Forgive me. On what basis did you think at the time
 3 that it would not have a big contribution to the
 4 development of a fire? Why do you say that?
 5 A. I can't remember. I can't remember what my thoughts
 6 were exactly at the time.
 7 Q. No, fair enough, but —
 8 A. I think — sorry, I apologise.
 9 Q. Please go ahead.
 10 A. I mean, I clearly would have read it at the time, may
 11 have had a discussion with George Lee about it, may have
 12 had other considerations, but I can't remember why it
 13 was included in those key factors assessed, because it
 14 normally wouldn't have a statement in there that then
 15 isn't repeated in the section 7, or just a straight
 16 reference to section 7.
 17 Q. Or in fact that can't be founded in any kind of
 18 scientific or evidential data?
 19 A. Yes.
 20 Q. Right. But I think you said earlier that you didn't
 21 pick it up at the time or you didn't read anything
 22 particularly significant into that wording?
 23 A. I don't think so, no. I can't remember — I think if
 24 I had, you know, we'd have omitted it.
 25 Q. Do you think you ought to have done, looking back now?

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1 A. With hindsight, yes, it obviously has caused confusion,
 2 so I don't think at the time I realised that it would
 3 cause confusion, but it's clearly — I think probably
 4 would be better off without it in the certificate.
 5 Q. Given what you have just said, I think I do need to ask
 6 you this at this stage: on what basis do you say in
 7 October 2008 that you were competent to check statements
 8 about fire performance in BBA certificates?
 9 A. I don't think I would be competent to, you know, check
 10 a fire-related comment in that particular way. I was
 11 probably, I suppose you could say, competent in looking
 12 at BBA certificates in general, but I don't — I didn't
 13 have any competence in fire as such —
 14 Q. No.
 15 A. — other than being able to read Approved Document B and
 16 the various standards and have some knowledge in that
 17 way.
 18 Q. All right, but not enough — is this right? — to pick
 19 up that it might be ill-advised to state in the fire
 20 performance section of a certificate for a combustible
 21 product definitively that the product would not
 22 contribute to the development stages of a fire? Is it
 23 genuinely your evidence that that did not strike you at
 24 the time as a significant or important statement?
 25 A. I don't think it did, not in that front summary.

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1 I think I would have perhaps attached more significance
 2 within section 7, but I realise that's not — you know,
 3 it does appear in the certificate and therefore,
 4 you know, forms part of the certificate. But, yeah —
 5 Q. I'm not sure that I do follow.
 6 On that basis, and in relation to the answer you've
 7 just given, how could you possibly, as head of
 8 approvals, have any confidence that what was being said
 9 within the certificate about the fire performance or
 10 properties in fire of that product was correct and
 11 accurate? You were the last line of sign-off before the
 12 chief executive, were you not?
 13 A. Yes, yes.
 14 Q. So how could you have had confidence at the time that
 15 your own checks on the technical content of that
 16 certificate were good, were accurate, were adequate?
 17 A. I think at the time I clearly thought they were, based
 18 on, you know, reading section 7 and knowing something
 19 about what was in Approved Document B, but ... I can't
 20 really say any more, I don't think.
 21 MS TROUP: All right, thank you, Mr Hunt. I'm going to ask
 22 you to stop there, because, Mr Chairman, I note the
 23 time.
 24 SIR MARTIN MOORE-BICK: Yes. Well, now, give me some help
 25 at this point: how much longer do you think you may

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1 require with Mr Hunt?
 2 MS TROUP: I am making fairly good progress and I hope to be
 3 no more than about an hour and a half in the morning,
 4 I'm afraid.
 5 SIR MARTIN MOORE—BICK: Another hour and a half?
 6 MS TROUP: I'm afraid so, possibly an hour.
 7 SIR MARTIN MOORE—BICK: Right, well — —
 8 MS TROUP: I'm being assisted. I think an hour is more
 9 realistic. I may be being overcautious.
 10 SIR MARTIN MOORE—BICK: Well, I think whether it's an hour
 11 or an hour and a half, we're not going to carry on now
 12 with a view to finishing tonight.
 13 Mr Hunt, I'm sorry about this, because I think you
 14 were probably told that we would manage to get through
 15 your evidence today, and that had been my hope. But
 16 clearly we're not going to manage to do that, even if we
 17 prolong the hearing a bit more than usual, so I'm going
 18 to have to ask you, I'm afraid, to come back tomorrow to
 19 continue your evidence. I hope that's not going to be
 20 too inconvenient.
 21 THE WITNESS: No, that's fine for me, sir.
 22 SIR MARTIN MOORE—BICK: All right, well, that's very good.
 23 In that case, we'll stop now, and we will resume at
 24 10 o'clock tomorrow morning, please. Again, as before,
 25 please don't discuss your evidence or anything relating

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1 to it with anyone else overnight. All right?
 2 THE WITNESS: Okay. Thank you.
 3 SIR MARTIN MOORE—BICK: Okay, thank you very much, and we'll
 4 look forward to seeing you at 10 o'clock tomorrow
 5 morning.
 6 THE WITNESS: Thank you.
 7 SIR MARTIN MOORE—BICK: Good, thank you very much.
 8 That's where we will close the proceedings for
 9 today. We will resume at 10 o'clock tomorrow.
 10 (4.32 pm)
 11 (The hearing adjourned until 10 am
 12 on Thursday, 18 March 2021)
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