

OPUS 2

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Grenfell Tower Inquiry

Day 41

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1 Wednesday, 23 September 2020
 2 (10.00 am)
 3 SIR MARTIN MOORE-BICK: Good morning, everyone. Welcome to
 4 today's hearing. Today we're going to hear from another
 5 witness, but from a different company. Is that right,
 6 Mr Millett?
 7 MR MILLETT: Yes, Mr Chairman, good morning. We are going
 8 to hear from Mr Geof Blades of CEP. May I please call
 9 Mr Blades.
 10 SIR MARTIN MOORE-BICK: Thank you.
 11 MR GEOF BLADES (affirmed)
 12 SIR MARTIN MOORE-BICK: Thank you very much, Mr Blades.
 13 Would you like to sit down, make yourself comfortable.
 14 Yes, Mr Millett.
 15 MR MILLETT: Mr Chairman, thank you.
 16 Questions from COUNSEL TO THE INQUIRY
 17 MR MILLETT: Mr Blades, good morning.
 18 A. Morning.
 19 Q. Can I start by saying thank you to you for coming to
 20 the Inquiry and giving us evidence today. It assists us
 21 with our investigations and we are extremely grateful to
 22 you.
 23 My questions are intended to be short and, I hope,
 24 simple, but if at any point you have difficulty
 25 understanding the question, I can repeat it or put it in

1

1 a different way.
 2 If you feel you need a break at any time, just let
 3 us know and we can take a break, but we will take
 4 scheduled breaks halfway through the morning and then
 5 again halfway through the afternoon at an appropriate
 6 point.
 7 Can I also ask you, please, to keep your voice up so
 8 that the transcriber, who sits to your right, can get
 9 down everything you say. Also, I should just add that
 10 a nod and a shake of the head doesn't go down on the
 11 transcript. If you can say "yes" or "no" as
 12 appropriate, that would be very helpful.
 13 A. Thank you.
 14 Q. You have made two statements to the Inquiry. I think
 15 the first is dated 12 November 2018, that's
 16 {CEP00064244}, please. Can we please have that up.
 17 That is the one dated 12 November. There is the
 18 signature at page 10 {CEP00064244/10}, please. Is that
 19 your signature?
 20 A. Yes.
 21 Q. I'm going to call that your first statement, the one of
 22 November 2018.
 23 Could we please also have up {CEP00064247}. This is
 24 another statement from you which responded to
 25 the Inquiry's request for further evidence from you, and

2

1 that's dated 16 August 2019. Can we please go to
 2 page 15 {CEP00064247/15}. You will find a signature
 3 there.
 4 A. Yes.
 5 Q. Is that your signature?
 6 A. Yes.
 7 Q. You also, I think, made a statement to the
 8 Metropolitan Police, and that is at {MET00040323}, and
 9 that's dated 18 February 2019. Is that it? Is that
 10 that statement?
 11 A. Yes.
 12 Q. Thank you. It's not signed, but it has your name at the
 13 top of it.
 14 A. That's right.
 15 Q. That's your statement.
 16 You also made, I think, a statement to the
 17 Metropolitan Police concerning the transfer of exhibits,
 18 and that's at {MET00040322}. Can we please have that
 19 up. Is that the statement transferring the exhibits?
 20 A. Yes.
 21 Q. Thank you very much.
 22 Have you read all of these statements recently?
 23 A. I haven't read the police ones, the Metropolitan Police
 24 ones.
 25 Q. Right. But you've read the two statements to the

3

1 Inquiry?
 2 A. I did, yes.
 3 Q. Very good. So that's your first statement and your
 4 second statement?
 5 A. Yes.
 6 Q. I'm going to call the second one the second statement.
 7 Can you confirm that their contents are true?
 8 A. Yes.
 9 Q. The Inquiry also received from you an unsolicited
 10 witness statement in October 2017.
 11 A. Yeah.
 12 Q. Can I show you that. That's {CEP000008838}, and that is
 13 dated, as you can see at the bottom under a signature,
 14 24 October 2017. Is that your statement?
 15 A. Yes.
 16 Q. I'm going to call that your 2017 statement, just so
 17 we're clear about it.
 18 A. Okay, thank you.
 19 Q. Are the contents of that statement true?
 20 A. Yes.
 21 Q. Have you discussed with anybody the evidence you're
 22 going to give today?
 23 A. No.
 24 Q. I'm going to start with the first topic, which is the
 25 history and role at CEP that you had.

4

1 It's right, I think, that you joined CEP in 2000,
 2 isn't it?
 3 A. Correct.
 4 Q. Prior to joining CEP, you worked for about 15 years in
 5 a window manufacturing business.
 6 A. Yes.
 7 Q. Initially at CEP, just to be clear, your role was
 8 business development manager and sales representative.
 9 A. Correct.
 10 Q. Is it right that between 2004 and 2017 you were
 11 a director of CEP?
 12 A. 2013, up until 2013, when the business was sold.
 13 Q. 2013. And in 2013, CEP was sold to is it Xerxes Equity?
 14 A. Yes, correct.
 15 Q. And that meant that CEP joined what was called or is
 16 joined the Omnis group of companies?
 17 A. Correct.
 18 Q. Omnis, I think, is made up of a number of companies
 19 serving the construction industry; is that right?
 20 A. Yes.
 21 Q. Is it right that each one is a distinct company, but
 22 they all share facilities such as human resources and
 23 accounting?
 24 A. That's correct.
 25 Q. From 2013, your job title -- is this right? -- was

5

1 commercial projects manager?
 2 A. The commercial projects manager was probably 2016.
 3 Q. Right. What was your job title from 2013?
 4 A. I think it was national glazing manager.
 5 Q. What was it in 2012, before the sale?
 6 A. I would have been a sales director of CEP Architectural
 7 Façades.
 8 Q. Now, your line manager, at least from 2012 -- is this
 9 right? -- was Neil Wilson.
 10 A. Yes. When the business was sold in 2013, end of 2013,
 11 Roy Fewster, who was the managing director, became the
 12 managing director for about 12 months of the new
 13 business.
 14 Q. Right.
 15 A. And then when he relinquished that -- it wasn't -- he
 16 wasn't a shareholder, I think, Neil Wilson then became
 17 the line manager.
 18 Q. I see. So Roy Fewster was your line manager in 2012,
 19 and --
 20 A. Yes.
 21 Q. -- after that it was, in 2013, Neil Wilson?
 22 A. It would have been -- yes. 2014, because the business
 23 was sold in 2013.
 24 Q. When in 2013?
 25 A. December.

6

1 Q. Oh, I see, at the end of the year?
 2 A. Yeah.
 3 Q. I think you retired in 2019; is that right?
 4 A. 2018.
 5 Q. 2018?
 6 A. November 2018.
 7 Q. I see.
 8 I want to examine with you CEP's position in the
 9 supply chain in general terms, to start with. The first
 10 of those subtopics which I'm going to look at would be
 11 CEP's services.
 12 Now, CEP is, or was in the period 2013 to 2016,
 13 I think, a fabricator of panels for use as rainscreen on
 14 exterior cladding systems on buildings?
 15 A. Yes, correct.
 16 Q. Is it right, or do I have this right, that to fabricate
 17 cladding, CEP take flat panels of products delivered to
 18 it from the manufacturer and then cut and fashion them
 19 to a particular size, shape and design for fitting on to
 20 a particular building?
 21 A. That's correct.
 22 Q. Where CEP is not contracted to provide the design of the
 23 façade, is it right that the customer would have to
 24 supply the design to CEP?
 25 A. That's correct.

7

1 Q. Is it right also that every façade or element of
 2 a façade that CEP supplied was effectively bespoke for
 3 an end buyer or a client?
 4 A. Yes.
 5 Q. Now, we understand -- and we'll come to this in detail
 6 later -- CEP works with aluminium composite panels, or
 7 ACM. Does CEP work with composite panels skinned with
 8 other metals, or did it during the period 2012 to 2016?
 9 A. No, it never successfully got a contract for anything
 10 other than the aluminium skins.
 11 Q. I see. So no zinc?
 12 A. No zinc, no.
 13 Q. Did it ever work with non-metal-skinned rainscreen
 14 panels such as, for example, Marley Natura?
 15 A. No.
 16 Q. Have you ever heard of Marley Natura?
 17 A. I have, yes.
 18 Q. What is Marley Natura?
 19 A. I think it's cement fibre board.
 20 Q. Yes.
 21 Is it right that CEP also works with a variety of
 22 manufacturers of original products, such as 3A who make
 23 Alucobond?
 24 A. Yes, we did.
 25 Q. In general terms, is it fair to say that CEP makes its

8

1 money by providing a service within a supply chain for
 2 specific projects, between the manufacturer and the end
 3 client?
 4 A. Yes.
 5 Q. Could you just tell us in brief terms how CEP makes its
 6 profit from the fabrication of cladding panels?
 7 A. They buy the -- purchase the panels from the supplier,
 8 the manufacturer of the raw panel, then they fabricate
 9 it and then put a profit margin to that, transport cost,
 10 et cetera.
 11 Q. I see. You say you get profit, transport cost,
 12 et cetera. That would include the fabrication costs?
 13 A. The fabrication -- yes, the fabrication, the panel, the
 14 labour to --
 15 Q. Would it follow from that answer that, in order to
 16 maximise the profit, CEP would aim to buy the products
 17 from the manufacturer at a low price and then sell them
 18 at a higher price, building in the fabrication costs,
 19 transport costs and the margin?
 20 A. Yes.
 21 Q. And presumably you would have a commercial interest in
 22 trying to negotiate the lowest price with the panel
 23 manufacturer?
 24 A. Yes.
 25 Q. Yes.

9

1 Is it right, tell me, that in 2012, 2013, 2014,
 2 those years, you would enjoy preferential rates in
 3 general, or would you negotiate individual prices on
 4 each order for each product?
 5 A. We would negotiate individual prices for each order.
 6 Q. Right, I see. So you weren't, as it were, a favoured
 7 buyer?
 8 A. No.
 9 Q. I see.
 10 Can I then turn to the question of design services.
 11 In your witness statements you mention
 12 Mr Mark Heywood, who has a company or firm, I think,
 13 called Mark Heywood Associates, MHA.
 14 A. That's correct.
 15 Q. Is it right that he is or was a façade designer?
 16 A. Yes, correct.
 17 Q. I think this is in your statements, but correct me, CEP
 18 would subcontract him in to design cladding from time to
 19 time where the client wanted a design service?
 20 A. If CEP was providing that service, yes.
 21 Q. I see.
 22 In what circumstances would Mark Heywood be
 23 contracted in to perform design services?
 24 A. If CEP were selling the complete system to a contractor,
 25 and design was required by us or by CEP, then Mark would

10

1 be employed to do the design.
 2 Q. Why would a subcontractor prefer to design themselves as
 3 opposed to leaving it to you to supply the full package,
 4 as it were?
 5 A. We, or CEP, would contract with a principal contractor,
 6 a main contractor, and there wouldn't be a subcontractor
 7 involved, that would be material-only supply. So we
 8 would supply and design the rainscreen system to a main
 9 contractor who would in turn employ an installation team
 10 to fit it to the wall. So there was no direct
 11 subcontractor.
 12 Q. Right. And where that happened, would there be direct
 13 contact between CEP and the installation team so that --
 14 A. Through -- that would be directly put through the main
 15 contractor.
 16 Q. I see, right.
 17 What would be the reason why a main contractor
 18 wouldn't come to you for the full package, but would
 19 prefer to just it leave to all to the subcontractor and
 20 have the subcontractor buy in materials and do the
 21 design themselves?
 22 A. Sorry, could you just run that one again, please?
 23 Q. Yes. Why would a main contractor prefer to go through
 24 a subcontractor for design, rather than coming to CEP
 25 for the full design and supply package?

11

1 A. It would be more cost-effective for them to do that,
 2 because they wouldn't incur the subcontractor's profit
 3 margin.
 4 Q. It would be more cost-effective for a main contractor to
 5 come to you?
 6 A. Yeah.
 7 Q. Yes, that's what I thought.
 8 A. And CEP themselves wasn't an installing contractor. We
 9 didn't do any installation, we didn't have that
 10 facility.
 11 Q. Right. So just cutting to the point, on a job like
 12 Grenfell, would it have been more cost-effective for
 13 Rydon to have come to CEP direct for the design as well
 14 as the supply as opposed to using Harley?
 15 A. Possibly, yes.
 16 Q. Yes.
 17 In your 2017 statement, the unsolicited one -- can
 18 we go to that, {CEP000008838/7}. Look at
 19 paragraph 7.10. You describe quoting there for a full
 20 cladding system, and you say halfway down:
 21 "This is my standard offer on cladding systems.
 22 I would not have to liaise with Mark Heywood, or any
 23 other Designer at this point, as this is the standard
 24 system the Company will always propose at this stage of
 25 discussions."

12

1 The context of this is that you were intending to
2 quote for -- at the very start of your discussions about
3 Grenfell in April 2012. You say at the beginning of
4 that paragraph:

5 "CEP was intending to quote for the full cladding
6 system."

7 I just want to ask you what you mean by "my standard
8 offer". Do you mean there that, at an early stage in
9 design, CEP would generally, as a matter of course,
10 offer a complete package system, insulation, cavity
11 barriers, claddings, fixings and design?

12 A. Yes, if that's largely what the project was going to be
13 required. So that would be a budget figure that we
14 would take from historic works, just to give the client
15 or the architect in this case, you know, a feel for
16 what -- where we -- where CEP would be with sort of
17 prices, really.

18 Q. Right. Would there be a design cost built into the
19 price that --

20 A. Yes.

21 Q. -- you would charge the client? And that would be the
22 cost of the design which would be outsourced to MHA?

23 A. Yes, we had an agreement with Mark Heywood, so it was
24 a sort of sliding scale.

25 Q. Yes.

13

1 Just tell me a little bit about that standard
2 package. Was that originally designed by Mark Heywood
3 Associates or --

4 A. Yes, it would have been, yes.

5 Q. I see. Do you know when it was originally designed?

6 A. I believe it was possibly the late 1980s, early 1990s.

7 Q. Right. And was it kept up to date with current
8 standards?

9 A. As far as I'm aware, it was. I think Mark -- we always
10 relied on Mark Heywood to keep us up to date with stuff.

11 Q. Right.

12 Would Mark Heywood develop the specification and
13 substitute products where necessary?

14 A. Not necessarily, no, that would be down to the client,
15 the architect or whoever's specifying the materials.

16 Q. I see.

17 So if design changes like product substitutions were
18 made, would you expect that a designer like Mark Heywood
19 Associates -- well, it would be Mark Heywood
20 Associates -- to have considered those substitutes?

21 A. Not necessarily, no, they would come from the client.

22 Q. I see.

23 A. Mark would only work with, you know, what we were -- if
24 we were, you know, the supplier of material, what the
25 client had changed the material to.

14

1 Q. Yes.

2 There was I think a time when CEP produced its own
3 façade build-up in about 2016; is that right?

4 A. How do you mean, our own design build-up?

5 Q. Was there a new system available in 2016?

6 A. Not that I can recall.

7 Q. Right.

8 Does the name Petrach panel mean anything to you?

9 A. Yes.

10 Q. Is it right that in 2016 the Petrach panel became the
11 new CEP off-the-shelf product within the --

12 A. Petrach was another division of the old CEP company. It
13 was nothing to do with the St Helen's operation. It was
14 manufactured down in Hastings.

15 Q. Right.

16 A. And that would have gone under the heading of
17 CEP Claddings.

18 Q. Okay. We may come back to that.

19 In general terms, did CEP perform a design service
20 itself at any stage or simply fabrication?

21 A. Just purely fabrication.

22 Q. Purely fabrication.

23 Now, am I right that when you supplied
24 an off-the-shelf design, for example the Mark Heywood
25 design, or the Petrach design perhaps, am I right that

15

1 CEP sells all of the component parts itself, so
2 cladding, insulation, cavity barriers, fixing elements?

3 A. Yes, we did originally. That did change --

4 Q. Right.

5 A. -- latterly.

6 Q. Now, for the Grenfell project, we understand that the
7 component parts of the façade were sourced separately.
8 Insulation --

9 A. Yes, correct.

10 Q. -- was sourced separately from cavity barriers, from
11 rainscreen panels.

12 At the time of the supply to Grenfell Tower, was it
13 common for CEP to supply only some component parts to
14 the project rather than to supply the fully designed
15 package?

16 A. It had become that way, later on in CEP's history, just
17 the way the market had changed.

18 Q. Right. When did that market start to change, can you
19 tell us?

20 A. I would guess sort of the mid-2000s.

21 Q. Right. So is this right: CEP gradually during the
22 mid-2000s began to be called on to supply only component
23 parts?

24 A. Correct, yeah.

25 Q. And that would be to subcontractors of main contractors,

16

1 would it?

2 A. Yes.

3 Q. I see. Were the majority of those parts rainscreen and

4 windows?

5 A. Yes.

6 Q. What about insulation?

7 A. They could sub -- they could buy their own insulation,

8 yes, so they would buy their own insulation.

9 Q. They could buy their own insulation?

10 A. Yeah.

11 Q. Would you ever be asked to supply insulation?

12 A. Possibly, yes.

13 Q. I see. But what was the most common element of

14 a rainscreen cladding system that you would be asked to

15 supply as a single component after the mid-2000s, do you

16 think?

17 A. The panel.

18 Q. The panel?

19 A. Possibly the rails. The rails or the panel.

20 Q. Right.

21 Where you were asked to supply the panel, possibly

22 the rails, would CEP simply have sourced and fabricated

23 them in accordance with the design supplied by the

24 client, or would you investigate how the panel or rails

25 would fit into the overall cladding system?

17

1 A. Sorry, can you just --

2 Q. Well, let me ask it a different way.

3 Where you were asked to supply component parts,

4 would CEP simply source them, fabricate them and deliver

5 them without asking any questions about how they were to

6 fit into the overall rainscreen system, or did you

7 investigate how they would fit in to the overall

8 rainscreen system?

9 A. No, we would leave that, the final decision, to the

10 subcontractor. We would just fabricate them or supply

11 them to their design requirements.

12 Q. I see.

13 At the time of the supply to Grenfell Tower -- and

14 we're looking at 2015 now, effectively -- can you tell

15 us, even if in broad terms, what proportion of CEP's

16 business was providing component parts to order, as

17 we've discussed, as opposed to providing a fully

18 designed off-the-shelf package?

19 A. 2015 ... probably ... 50/50.

20 Q. 50/50?

21 A. 50% full system, and 50% components.

22 Q. Right.

23 I'm now going to turn to the string of contracts,

24 just by way of an overview on the Grenfell Tower

25 project.

18

1 It's right, I think, that CEP contracted with Harley

2 in around September 2014 to supply fabricated window

3 frames and glazing.

4 A. That's correct.

5 Q. And then in February 2015, to supply fabricated cladding

6 panels and fixings.

7 A. I think it was just the panels only.

8 Q. In the end?

9 A. Yeah, I'm not sure about the fixings. I think it was

10 just the panels only.

11 Q. All right. Let's ignore the fixings, but certainly the

12 fabricated cladding panels?

13 A. Yes.

14 Q. We know, I think, that CEP was not ultimately contracted

15 to supply the complete façade, just those component

16 parts.

17 A. Correct.

18 Q. Now, I want to look at the role that CEP played in the

19 supply chain.

20 First of all, Arconic, who I think were called Alcoa

21 at that stage. Is it right that CEP had worked with

22 Alcoa, later Arconic, for a number of years prior to the

23 Grenfell Tower refurbishment?

24 A. Yes.

25 Q. We'll come to look at that in due course in some more

19

1 detail, but we understand that CEP entered into

2 a contract with Arconic for the supply of the Reynobond

3 PE 55 rainscreen panels, the ACM panels, in March 2015

4 for the Grenfell Tower project.

5 A. Correct.

6 Q. Yes.

7 Now, looking at the history of the relationships

8 with the parties in the supply chain, can we go to your

9 first statement, please, and I want to look at Studio E,

10 to begin with. {CEP00064244/4} and look at the bottom

11 of the page, paragraph 16, and the bit I want to look at

12 goes over the page. You say there:

13 "I first became aware of the Refurbishment in or

14 around March 2012, when discussions with Studio E began.

15 I do not recall how the initial contact arose but

16 I assume that Studio E approached CEP given that I had

17 no knowledge of the planned Refurbishment at this time."

18 Just pausing there --

19 A. Yeah.

20 Q. -- had you ever come across Studio E before the

21 Grenfell Tower refurbishment?

22 A. No.

23 Q. Do you know how Studio E came to learn of you?

24 A. No. I -- no.

25 Q. Rydon. Is it right that you had worked with Rydon

20

1 before on, I think, the Chalcots Estate project?
 2 A. Yes.
 3 Q. That's 2006, wasn't it?
 4 A. Yes.
 5 Q. Were there any other projects on which you had worked
 6 previously with Rydon before the Grenfell Tower project?
 7 A. We worked with them on the Chalcots Estate through
 8 Harley as a subcontractor.
 9 Q. Yes. Any other projects?
 10 A. No.
 11 Q. No.
 12 And Harley, let me just ask you about Harley. You
 13 say in your police statement that you worked with
 14 Harley, I think, on ten projects before the
 15 Grenfell Tower project. Is that right?
 16 A. I would believe so, yeah.
 17 Q. Yes. Just for the reference, it's your police statement
 18 at page 4 {MET00040323/4}, the main one.
 19 Now, I'll give you some names and just check them
 20 off.
 21 Would that include Waylands House?
 22 A. Yes.
 23 Q. Olympic Way, Wembley?
 24 A. I believe so, yes.
 25 Q. You have mentioned Chalcots.

21

1 A. Chalcots.
 2 Q. Clements Court?
 3 A. Again, I believe so. I wasn't involved in that
 4 personally.
 5 Q. Okay.
 6 Can we go, then, to the offline of this document,
 7 {CEP000003010}. Now, this is a list of projects done by
 8 CEP, prepared by CEP after the fire, with input from
 9 Deborah French of Arconic. What you will see there is
 10 an Excel spreadsheet.
 11 Do you remember this document? Have you seen this
 12 document before?
 13 A. Yes, I believe I have.
 14 Q. If we go down to row 38. It's divided up into parts,
 15 and this part is under "Projects December 13 - June 17".
 16 Cell 38 or row 38 is Waylands House.
 17 A. Yeah.
 18 Q. You can see, looking across the page, if you go to
 19 columns H and I -- you can see "Harley Curtain Wall" in
 20 column D, and you can see in H "Reynobond PE", and I,
 21 "Face Rivets".
 22 Face rivets is riveted or face-fixed, I think,
 23 isn't it?
 24 A. Correct, yes.
 25 Q. As opposed to cassettes?

22

1 A. Correct.
 2 Q. Yes. We can see the cladding panel, as I say, was
 3 Reynobond PE face-fixed.
 4 So the supply to Waylands House, was it PE-cored?
 5 A. I believe so, if it's -- yes.
 6 Q. We can see others up in the list saying FR.
 7 A. Yeah.
 8 Q. Is that fire retardant? If you look higher up
 9 column H --
 10 A. Yes, yes.
 11 Q. -- you will see, for example, that Falkirk was
 12 Fundermax FR, fire retardant.
 13 Looking at some other projects, if you go to row 71,
 14 you have got Olympic Way, Wembley. Again, Harley
 15 Curtain Wall, panels only, Alucobond under column H, PE,
 16 face rivets. Do you see that?
 17 A. Yes.
 18 Q. And Chalcots, going up to row 57, is Reynobond PE face
 19 rivets.
 20 Again, Clements Court at 58, just below that:
 21 Hounslow, Clements Court, panels, Reynobond PE, face
 22 rivets.
 23 Do you know whether CEP ever supplied cladding to
 24 Harley with any core other than PE?
 25 A. Not that I'm aware of.

23

1 Q. Right.
 2 Is it your recollection that most of the time when
 3 you supplied cladding panels to Harley you were
 4 supplying face-fixed panels?
 5 A. Erm ... yes. Yes.
 6 Q. And in fact, looking at this spreadsheet, am I right
 7 that Grenfell Tower was the only project with Harley
 8 where CEP supplied cassette panels?
 9 A. Yes.
 10 Q. Yes.
 11 It looks, looking at this list of projects -- and
 12 one can scroll up a little bit towards the 2013 to 2017
 13 section of it -- that you regularly supplied -- is this
 14 right? -- both PE and FR panels for high-rise buildings.
 15 A. The Fundermax product isn't an ACM.
 16 Q. Right.
 17 A. The Falkirk projects.
 18 Q. Let's look at row 8. Let's try one on you and then we
 19 can move forward. Row 8 is Bagot Street, Birmingham,
 20 building height 30 metres, so it's above 18 metres, it's
 21 a residential, and Reynobond FR went on to there. Do
 22 you see that?
 23 A. Yes.
 24 Q. So that's an example of where you did supply FR to
 25 a high-rise. There is another one at row 34, I think --

24

1 no, that's PE, but that's a PE cassette, also
 2 a high-rise. Do you see that? Which is a commercial --
 3 A. Yes.
 4 Q. Would I be right, though, in saying, just in general
 5 terms, that you would supply FR and PE?
 6 A. It would appear from that. Those two projects I wasn't
 7 involved in.
 8 Q. Right.
 9 Just in general terms, what would prompt
 10 a contractor to choose PE as opposed to FR core ACM
 11 panels, where they were both available?
 12 A. I would say that the FR became more prominent after the
 13 Grenfell Tower.
 14 Q. Right. More prominent?
 15 A. Or prominent.
 16 Q. Yes, I can understand that. When you say after the
 17 Grenfell Tower, do you mean the fire or the project?
 18 A. Sorry, the fire.
 19 Q. Yes, that I understand. Before the fire, and
 20 particularly I'm interested in the period 2012 to 2016,
 21 certainly 2015, I'm interested in what would prompt
 22 a contractor to choose PE as a core for an ACM panel as
 23 opposed to an FR core?
 24 A. I'm not sure why. The contractor would have a reason
 25 for you, probably does have a reason, but I wouldn't be

25

1 aware of what his reason was.
 2 Q. Right. But you deal with end buyers; do you know from
 3 your experience of your buyers' market why it would be
 4 that a buyer would choose PE if FR was available?
 5 A. Not really, no.
 6 Q. What would Mark Heywood Associates put into the
 7 full-blown cladding system design where that was ordered
 8 by an end buyer, would it be PE or would it be FR?
 9 A. I'd have to ask him what he would do in that situation.
 10 I can't answer for him.
 11 Q. Right. Well, we'll come back to that issue later on.
 12 Is it right that zinc panels, for example made by
 13 KME, and I'm thinking specifically of the Proteus HR
 14 zinc panel, would be supplied ready fabricated by KME
 15 and wouldn't need to come to CEP?
 16 A. I guess. I've never dealt with them, we never dealt
 17 with them at all, and I personally was aware of the
 18 company but I wasn't aware of the products at all.
 19 Q. Yes. Does it follow that anybody coming to CEP would
 20 necessarily be looking for a supply of ACM panels?
 21 A. Can you repeat that one again, please?
 22 Q. Yes. If anyone was coming to CEP and asking for
 23 rainscreen panels, they would necessarily be asking for
 24 ACM?
 25 A. Not necessarily, no.

26

1 Q. What else would they be asking for?
 2 A. We had the Fundermax product that's there, and we had
 3 one called Steni, which was a reconstituted stone.
 4 Q. Steni, reconstituted stone -- is that the Steni, I'm
 5 looking at this --
 6 A. It is, yes.
 7 Q. -- "Steni Nature & Colour". And reconstituted stone, is
 8 that a particulate?
 9 A. Yes.
 10 Q. Like cementitious particulate?
 11 A. No, it's more of a stone with a fibreglass resin
 12 backing.
 13 Q. Right. And the Fundermax, what is Fundermax?
 14 A. Fundermax is a high-pressure laminate.
 15 Q. Oh, I see, HPL?
 16 A. HPL, yes.
 17 Q. Right.
 18 What core did the Steni product have?
 19 A. It didn't have a core in the same sense as an ACM. It
 20 was a fibreglass and resin matting and then stone was
 21 mixed on the surface or the external surface of it.
 22 Q. Why would buyers, customers, clients select Steni,
 23 a reconstituted stone, as opposed to, for example, ACM?
 24 A. The Steni was sold primarily into Scotland, into the
 25 Scottish market, and it suited the Scottish building

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1 landscape.
 2 Q. Building landscape or Building Regulations?
 3 A. For the exterior of the building, it just suited what
 4 they use in Scotland.
 5 Q. Oh, I see. So aesthetically rather than from
 6 a regulatory point of view?
 7 A. Aesthetically, yeah. We did, I think, four blocks in
 8 Brighton long before I joined CEP, and everything else
 9 from Steni went to Scotland.
 10 Q. What about Fundermax? What is the skin or the external
 11 surface of Fundermax?
 12 A. The high-pressure laminate, that's layers of paper or
 13 thin card and resin that's compressed together to make
 14 a high-pressure laminate.
 15 Q. Okay. And is there a core of that?
 16 A. There isn't the core in the same way, no.
 17 Q. Again, why would buyers prefer Fundermax as opposed,
 18 for example, to Reynobond ACM, whether PE or FR?
 19 A. Fundermax -- the high-pressure laminates were around
 20 before -- largely before the ACMs came to be. They were
 21 a flat surface, very resilient board, very good
 22 weatherboard, et cetera, that was used on the external
 23 of buildings.
 24 Q. Right.
 25 I think you said before that when it came to

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1 metal-skinned panels, you would only work with
 2 aluminium; is that right?
 3 A. With ACMs, not with true monolithic aluminium, we didn't
 4 have the plant to fabricate true, you know, 3-mil
 5 aluminium.
 6 Q. I see. Okay. What about zinc?
 7 A. Never worked with zinc.
 8 Q. Right. I was going to ask you some questions about zinc
 9 composite material, ZCM. Have you heard of ZCM?
 10 A. I have.
 11 Q. I think you're telling us CEP did not work with ZCM?
 12 A. We hadn't worked with it.
 13 Q. Right.
 14 Can I then turn to your relationship with Arconic.
 15 You say in your first witness statement at paragraph 12
 16 {CEP00064244/3} that CEP had a long-standing commercial
 17 relationship with Arconic, Alcoa, then Arconic, among
 18 other panel manufacturers. Is that right?
 19 A. Yes.
 20 Q. I think CEP had been working with Arconic as a supplier
 21 to CEP since about 2006; is that right?
 22 A. Correct, yes.
 23 Q. Am I right in thinking -- and I get this from your
 24 statement -- the first time you worked with Arconic and
 25 specifically Reynobond ACM was the Chalcots Estate

29

1 project in London in 2006?
 2 A. Correct.
 3 Q. Did you ever visit the Arconic factory in Merxheim in
 4 France?
 5 A. No.
 6 Q. We are told by Mr Wehrle in his witness statement at
 7 paragraph 105 -- I'll just put the reference into the
 8 transcript: it is {MET00053190/30} -- that CEP visited
 9 for a technical presentation there in February 2006.
 10 Do you know anything about that?
 11 A. No.
 12 Q. So can we take it that it wasn't you?
 13 A. I didn't go, no.
 14 Q. Do you know whether it took place at all?
 15 A. I don't, no.
 16 Q. Did CEP have an account with Arconic?
 17 A. Yes.
 18 Q. Did CEP have an account with 3A?
 19 A. Eventually, yes.
 20 Q. Eventually, when?
 21 A. Erm ... I'm not sure. Maybe 2014/15, I'm not sure.
 22 Q. Did having an account with Arconic make it much easier
 23 to place orders?
 24 A. It wasn't any easier to place orders.
 25 Q. Right.

30

1 What caused CEP to open an account with 3A in 2014
 2 or 2015, do you think?
 3 A. Prior to that, 3A sold through distributors, and then
 4 I would guess that they decided to sell direct to --
 5 Q. I follow.
 6 A. -- fabricators like ourselves.
 7 Q. Yes, I see.
 8 Would you describe CEP's commercial relationship
 9 with Arconic, which you had I think from 2006, as
 10 a strong one, a good one?
 11 A. A good one, yes.
 12 Q. Is it fair to say that you would prefer to work with
 13 Arconic if possible over other manufacturers?
 14 A. No.
 15 Q. Now, Deborah French says in her statement -- and for the
 16 reference, this is {MET00053162/2}, there is no need to
 17 turn it up, paragraph 5, her second statement -- that
 18 she joined Arconic in 2007. That's her recollection of
 19 her joining Arconic.
 20 Had you been dealing with Deborah French from that
 21 time, 2007, do you remember?
 22 A. I don't recall, no.
 23 Q. How would you describe your relationship with
 24 Deborah French?
 25 A. A professional business working relationship.

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1 Q. A good one, good commercial relationship?
 2 A. How would you describe that? Like every -- like the
 3 other relationships I had with others, yeah.
 4 Q. Now, before 2012, is it right that you worked with
 5 Deborah French quite often on projects? I know "quite
 6 often" is a bit of a vague question, but reasonably
 7 frequently?
 8 A. Yes.
 9 Q. Did she visit CEP's workshop from time to time?
 10 A. Yes.
 11 Q. Did she give CEP information and brochures about
 12 Reynobond products?
 13 A. Probably, yes.
 14 Q. Did you ever meet her away from your workshop from time
 15 to time?
 16 A. Only in meetings such as, you know, if we had to go to
 17 a meeting together.
 18 Q. Right, a meeting with whom?
 19 A. Architects or --
 20 Q. Right. Okay. Architects on projects?
 21 A. On projects, yes.
 22 Q. So would you habitually go with Deborah French to meet
 23 architects on projects?
 24 A. No, not habitually, no.
 25 Q. Right.

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1 A. Only when needed be.
 2 Q. Who would decide whether she should come? Would the
 3 architect say, "Bring Deborah French", or would you
 4 decide?
 5 A. Possibly, yes. They could do, yes. If they wanted
 6 product knowledge of Arconic, then I would take
 7 Reynobond or Deborah French in with me.
 8 Q. Right.
 9 Can we go to {CEP00051312}, please. This is
 10 an email chain from April 2014, and I want to look at
 11 the email from you to her at the top of that page. This
 12 is in response to hers to you of 25 April 2014. Now,
 13 there's quite a long history --
 14 A. Yes.
 15 Q. -- to your involvement in the project which we're going
 16 to come to later, but I just want to look at this email
 17 run.
 18 Your response to her is:
 19 "Debbs,
 20 "I will always believe YOU but, not all sales rep's
 21 as I'm from that background!!! Whereas Alcoa employ
 22 honest highly trained professionals.
 23 "Enjoy your holiday."
 24 I just show you that as an example, but is it right
 25 that that exemplifies the sort of relationship you had

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1 with her, informal and one of trust?
 2 A. Yes.
 3 Q. Did that kind of relationship enable CEP to get
 4 favourable deals on ACM panels?
 5 A. I wouldn't say so, no.
 6 Q. No?
 7 There were other Arconic sales reps in the UK,
 8 I think, at the time. Have you ever heard of
 9 Robert Campbell?
 10 A. No.
 11 Q. Robert Campbell worked on the Reynolux product. He
 12 represented Arconic for the sale of Reynolux. Did you
 13 know that?
 14 A. I may have heard that but I've never met the gentleman,
 15 I don't know of him.
 16 Q. Right.
 17 Reynolux is aluminium cladding with no core. It's
 18 not an ACM. Did CEP ever work with Reynolux?
 19 A. No.
 20 Q. I see.
 21 Does CEP or did CEP ever work with solid metal
 22 panels at all?
 23 A. No.
 24 Q. I see, only core.
 25 So you didn't work with Robert Campbell. Did you

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1 work with anybody else supplying Reynobond ACM?
 2 A. When Debbie French left Arconic, there was a gentleman
 3 called Vince Meakins took her place.
 4 Q. I see. Can you give a date to that?
 5 A. No, not really.
 6 Q. Right.
 7 Now, you have told us that if a designer -- this is
 8 a slightly separate question from the relationships
 9 question -- chose, for example, solid aluminium or solid
 10 zinc, then that wouldn't be CEP's --
 11 A. No.
 12 Q. -- job, you wouldn't be manufacturing those. Right.
 13 Can I then turn to your own personal experience and
 14 knowledge, and I want to start with your experience of
 15 cladding and windows.
 16 I think before CEP, as you have told us, you worked
 17 in a window manufacturer.
 18 A. Yes, that's correct.
 19 Q. And are therefore very familiar with window products,
 20 technology, suppliers, et cetera.
 21 Is it fair to say that, before you came to CEP, you
 22 had a great deal more experience and expertise in
 23 windows --
 24 A. Correct.
 25 Q. -- than cladding?

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1 A. Correct, yes.
 2 Q. Have you ever had any training in cladding technology?
 3 A. No.
 4 Q. Does it follow, therefore, that you have never had any
 5 training in the fire performance of cladding products?
 6 A. No.
 7 Q. Now, we looked at the question of core before. We know
 8 that ACM comes in a variety of different cores, or at
 9 least two: PE and FR. I want to focus on PE.
 10 Can we go, please, to your 2017 statement at
 11 page 10, {CEP000008838/10}, please. I would like to
 12 look at paragraph 7.36 with you, three-quarters of the
 13 way down the page, under the heading, "Alteration from
 14 zinc to aluminium cladding". You say at 7.36:
 15 "The available option after Steni and zinc had been
 16 discounted, given price was an issue, was a standard
 17 Aluminium Composite Material ('ACM') with a paint
 18 finish. Arconic ([Alcoa] at the time) produced a
 19 Reynobond ACM panel, commonly referred to as Reynobond
 20 ACM. This product would have a 'PE' core."
 21 You refer to it, as I say, as a standard, and would
 22 have a PE core, and you say in paragraph 7.37, just
 23 below it, that:
 24 "PE stands for polyethylene and describes the
 25 material placed between two aluminium panels to make up

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1 a rainscreen panel. The panel forms the exterior of the
2 cladding system.”
3 What you have set out there, did you know what you
4 have set out at paragraphs 7.36 and 7.37 there at the
5 time of the Grenfell Tower project?
6 A. Sorry, can you re-ask the question, please?
7 Q. Let me try it a different way.
8 Was the supply of a standard ACM with a PE core
9 something that you had experience of at the time of the
10 Grenfell Tower project, so from 2012 onwards?
11 A. Yes.
12 Q. What was your understanding at that time -- in other
13 words, within that period -- of what polyethylene was?
14 A. With regards to ...?
15 Q. What sort of material was polyethylene?
16 A. Not -- other than it was the core of the --
17 Q. Yes.
18 A. -- panel.
19 Q. What is polyethylene?
20 A. Well, it's a plastic.
21 Q. And you knew it was a plastic then, did you?
22 A. Not particularly. I didn't take that bit on board. It
23 was just a PE core.
24 Q. Right.
25 A. Never looked at it in great depth.

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1 Q. Did you know that polyethylene was combustible?
2 A. No.
3 SIR MARTIN MOORE-BICK: I imagine, Mr Blades, you had seen
4 many of these panels in the flesh, so to speak, had you?
5 A. Yes.
6 SIR MARTIN MOORE-BICK: So you would have recognised the
7 fact that there was something between the two --
8 A. Yes, correct.
9 SIR MARTIN MOORE-BICK: -- skins of aluminium and it
10 possibly looked a bit plastic, is that --
11 A. Correct, yes.
12 MR MILLETT: Did it ever occur to you consciously: this is
13 plastic?
14 A. Not that I'm aware of, no.
15 Q. Right.
16 Can we please look at Ms French's second witness
17 statement, and I referred to that earlier,
18 {MET00053162/7}, please. I would like to look with you,
19 Mr Blades, at paragraph 28, and she says about halfway
20 down that block of text:
21 "Of course, I appreciate that PE was plastic ..."
22 Do you see that? Just below halfway down.
23 A. Yes, got it, yeah, yes.
24 Q. "Of course, I appreciate that PE was plastic and was and
25 is flammable, that would have been obvious to anyone but

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1 PE product was regulated and accredited by external
2 accreditation bodies, for example, the BBA.”
3 When she says that "PE was plastic and was and is
4 flammable, that would have been obvious to anyone", was
5 the flammability of PE obvious to you at the time you
6 worked on the Grenfell project?
7 A. No.
8 Q. So did you never discuss the flammability of PE with
9 Ms French?
10 A. No.
11 Q. What about with the designer, Mark Heywood?
12 A. Mark Heywood wasn't involved in the Grenfell Tower, so
13 I wouldn't discuss it with him. I had no reason to.
14 Q. No, but he would have been doing designs on other
15 projects using PE-cored ACM or --
16 A. I never discussed the core with him either.
17 Q. Right.
18 Before the Grenfell Tower fire, so June 2017, if
19 a UK customer ordered ACM, did you understand them to be
20 ordering a panel with a PE core?
21 A. Yes.
22 Q. So you understood that that would be the default or
23 standard order in the UK?
24 A. It would have been the standard Reynobond in that case,
25 yes.

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1 Q. I see.
2 Can we go to your second witness statement and
3 I want to look at FR core as a comparator. This is your
4 second statement page 5 {CEP00064247/5}, please, and
5 I want to look at paragraph 24. You say there,
6 underneath the heading "Reynobond with an FR core":
7 "As far as I am aware, this product is class 0 ..."
8 A. Yes.
9 Q. Then you go on to say in the last sentence:
10 "It was not until after the Refurbishment that CEP
11 became aware that Arconic supplied an FR product, namely
12 Reynobond FR."
13 When you say recently, when do you think you did
14 learn about FR-cored ACM panels?
15 A. I don't recall. It wasn't a product that Reynobond or
16 Arconic pushed.
17 Q. You say pushed?
18 A. Or promoted.
19 Q. Right. But they did supply it?
20 A. Possibly, yes.
21 Q. You say possibly. It sounds --
22 A. You know, prior to those days, we hadn't or I hadn't
23 used the FR product.
24 Q. No, but were you aware that Arconic supplied Reynobond
25 ACM with an FR core?

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1 A. No. Not --

2 Q. Right. Well, we may come back to that shortly.

3 Let me just go back to my question so that I have
4 your evidence on it: do you remember when it was after
5 the Grenfell Tower fire that you did become aware that
6 Arconic supplied an FR-cored ACM panel?

7 A. No, I don't recall that.

8 Q. Right.

9 Can we go to {CEP00049832}. Now, this is an email
10 exchange in June 2013 between you and Richard Geater at
11 3A about another project. So this is not Grenfell.

12 You were asked by him -- we can scroll down the
13 email chain. Let's look at the whole exchange. It
14 starts at page 3 {CEP00049832/3}. The context here is
15 that you're asking about the pricing of Reynobond as
16 compared with the pricing of 3A's product, Alucobond.
17 That's what you were interested in.

18 If we start at page 3, we can see that
19 Richard Geater comes to you and says -- this is
20 10 June 2013:

21 "Hi Geof,

22 "When you have a moment I wondered if I could
23 enquire if our direct rates are a more attractive
24 proposition and also have closed the gap with
25 Reynobond."

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1 Then if you go to page 2 {CEP00049832/2}, you go
2 back to him and you say:

3 "Looking at the [latest] quotes you were slightly
4 higher, about £1-30/m2."

5 You say you have quotes based on HPL.

6 Then if you look a little bit above that on the
7 page, 14 June, he comes back to you:

8 "Hi Geof,

9 "Thanks for the feedback.

10 "May I ask if the Reynobond offer is for PvdF, fire
11 rated core?"

12 Just to start with, what did you understand by PVDF?

13 A. I think that's the finish, the paint finish.

14 Q. Right.

15 Then he says "fire rated core", and if we go up to
16 the first page {CEP00049832/1}, at the bottom of that
17 page, you reply to him on 17 June, as we see. Just
18 scroll up to the bottom of page 1. You say:

19 "Morning Richard,

20 "Ref Reynobond, I don't think so, but didn't request
21 that spec."

22 So is it right, looking at that, that in June 2013
23 you knew that Arconic did make a Reynobond product with
24 a fire rated core but just hadn't asked for it on that
25 occasion? Is that how we should read that?

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1 A. Possibly, yes.

2 Q. I see.

3 Staying on that page, looking up the page to the
4 top, you can see that 3A Composites reply on 17 June.
5 Richard Geater says:

6 "Hi Geof,

7 "That clarifies the price difference. Alucobond has
8 a FR core and PvdF paint system as standard. Alcoa can
9 offer this but they will charge considerably more than
10 £1:30m2.

11 "Alcoa won't change their core until they are forced
12 to due to changes in the fire regulations, else
13 Reynobond will become too expensive.

14 "3A Composites are heavily marketing our FR core and
15 discussing the requirement for fire retardant materials
16 with architects, especially on residential buildings."

17 Now, when you received that, you couldn't have been
18 in any doubt, could you, that Arconic did make an FR
19 product?

20 A. Correct.

21 Q. Right. So you did discover before the fire that Arconic
22 did make an FR ACM product?

23 A. Looking at that, yes.

24 Q. I see. So are you prepared to correct the evidence you
25 gave earlier on?

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1 A. Yes, I will.

2 Q. Thank you.

3 A. I don't remember that email we've just looked at now.
4 I don't recall receiving that email.

5 Q. Okay.

6 Is it right that, at least looking at this, in fact
7 it was a significantly more expensive product than a PE
8 core product?

9 A. Yes.

10 Q. Yes.

11 Were you aware from that that FR would have a better
12 fire performance than ACM with a PE core?

13 A. Looking at this, yes.

14 Q. It would follow, looking at this, that 3A supplied its
15 own FR product, namely Alucobond.

16 A. Correct.

17 Q. And that Alcoa, Arconic, weren't selling the FR version
18 of an ACM panel because it would make their ACM product
19 uncompetitive.

20 A. Looking at this, yes, correct.

21 Q. Yes.

22 Again, looking at this, and see if this has prompted
23 a recollection, if FR core was available to an architect
24 or a subcontractor, for example, looking at rainscreen
25 ACM, why would they opt to buy a PE core at all where it

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1 was to be used over 18 metres?
 2 A. They probably wouldn't.
 3 Q. Do you know why it was even offered over 18 metres where
 4 FR was available?
 5 A. Sorry, can you --
 6 Q. Yes. Can you think of any reason why any architect or
 7 cladding subcontractor would buy a PE-cored ACM panel
 8 where FR was available, where the building project was
 9 over 18 metres?
 10 A. No.
 11 Q. Can I ask you to look at Deborah French's second witness
 12 statement, {MET00053162/8}, please, which is now there
 13 on the screen. If you look, please, at paragraph 32,
 14 six lines or so down from the start of the paragraph,
 15 she says -- and this is the context of the different
 16 markets, and in Germany she says it was more usual for
 17 customers to order FR, and then she says:
 18 "I do not know the reason for this but I assume it
 19 related to the respective regulatory regimes. I would
 20 also add that fabricators in the UK did not really like
 21 working with FR because it is more difficult and costly
 22 to fabricate than PE. For example, it tends to wear
 23 down the cutting tools much more quickly than PE. This
 24 was a general comment made by fabricators I worked with,
 25 including, for example, Sotech, CGL and Argonaut but

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1 I cannot recall a specific instance of when a specific
 2 fabricator told me this."
 3 Is Deborah French right that FR core ACM is more
 4 difficult or more costly to fabricate for the reasons
 5 she gives?
 6 A. I couldn't say, because I didn't get involved in the
 7 production side at CEP, so ...
 8 Q. Right.
 9 Had you ever heard it said that FR was more
 10 unattractive for fabricators in the position of CEP,
 11 where they were asked to fabricate an FR core, because
 12 it was more costly to fabricate because it wore the
 13 tools down more quickly?
 14 A. Sorry, can you repeat the first part?
 15 Q. Yes. Had you ever heard industry discussion that FR was
 16 more expensive for fabricators to fabricate --
 17 A. No.
 18 Q. -- because, for example, it wore down the tools?
 19 A. No.
 20 Q. Can you comment on what she says there about that?
 21 A. Not really, no.
 22 Q. It looks, looking at the list that was put together on
 23 the spreadsheet we looked at earlier, that CEP in
 24 general did supply more PE core than FR core, at least
 25 during the years 2013 to 2017.

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1 A. Correct.
 2 Q. Would that be right?
 3 A. Correct.
 4 Q. Yes.
 5 Now, we also know that Arconic developed its own
 6 A2 standard core in about 2015 to 2016 which achieved
 7 a Euro class A2 fire classification. Did you know that?
 8 A. No.
 9 Q. Did any customers to your knowledge ever ask CEP
 10 specifically for A2-cored products?
 11 A. No.
 12 Q. Can I then turn to the question of fixing methods, and
 13 I want to ask you about the fabricated product.
 14 In your experience as at the period 2012 to 2015,
 15 did customers tend to prefer cassette-fixed cladding or
 16 riveted cladding?
 17 A. I don't believe there was a particular choice. The
 18 architect or the client would have had a preference
 19 himself to either a face-fixed, where you potentially
 20 could see rivets, to a cassette-fixed where you can't
 21 see the fixings. It was purely aesthetic, in my belief.
 22 Q. Right. In general terms, though, did you detect
 23 a preference for one or the other?
 24 A. Not really, no.
 25 Q. Right.

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1 In terms of output from your plant, would you
 2 deliver more cassette than rivet or more rivet than
 3 cassette? I know it's a very general question, but can
 4 you give us a feel for that?
 5 A. Not really, no.
 6 Q. Right.
 7 Now, I want to turn to fire performance and the
 8 question of class 0.
 9 Now, if you go to your second witness statement,
 10 page 5 {CEP00064247/5}, please, I want to look at
 11 paragraph 22. This is under the heading:
 12 "Understanding of (i) fire performance and
 13 classification; and (ii) pricing and reasons for
 14 variations in pricing of types of Reynobond ACM before
 15 the fire at Grenfell Tower on 14 June 2017."
 16 In that paragraph you say, three lines down:
 17 "This being said ..."
 18 Perhaps I should start at the beginning. You say:
 19 "As regards to the Refurbishment, as outlined in my
 20 witness statement of 12 November 2018, CEP was never
 21 asked or instructed to carry out an assessment of the
 22 regulatory and legislative compliance of the exterior of
 23 the building. This being said, as outlined above at
 24 paragraph 19, CEP understood that the Reynobond panels
 25 were classified as class 0 as under the Building

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1 Regulations and it was therefore our understanding that
 2 they could form part of a safe and compliant structure
 3 that was designed by other parties."

4 Class 0. Is what you have written in that sentence,
 5 "CEP understood", your personal understanding at the
 6 time?

7 A. That was my personal understanding.

8 Q. Right. How did you come to that understanding?

9 A. I don't recall, just through listening and learning from
 10 the people we'd worked with.

11 Q. Was there any purpose or point of CEP knowing the fire
 12 classification?

13 (Pause)

14 A. I'm not sure what you mean by the question, please.

15 Q. Let me try it again.

16 Was it relevant to CEP to know that the Reynobond
 17 panels were, as you understood it, classified as
 18 class 0?

19 A. Yes, I would believe so.

20 Q. What was the point of that, what was the purpose?

21 A. That it complied with the Building Regulations.

22 Q. Why did it matter to you, CEP, that it complied with the
 23 Building Regulations?

24 A. It was just a compliant -- other than complying with
 25 Building Regulations, that was about it.

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1 Q. Right. Well, my question was really: why did it matter
 2 to you? Why was it relevant?

3 A. -- knew then it was a product that did comply with
 4 Building Regulations as opposed to a product that didn't
 5 comply with Building Regulations.

6 Q. Right.

7 A. You know, it met a standard of some degree.

8 Q. Right. So did it matter to CEP that it supplied
 9 a product which complied with the Building Regulations?

10 A. I would say so, yes.

11 Q. Is that because you didn't want to supply a product that
 12 didn't comply with the Building Regulations?

13 A. Yes.

14 Q. Yes. And did --

15 SIR MARTIN MOORE-BICK: Just help me, Mr Blades. As
 16 I understand it, you get an order from a contractor,
 17 "Please make up the following cassettes or panels",
 18 whatever --

19 A. Correct.

20 SIR MARTIN MOORE-BICK: -- "of the following material"; is
 21 that right?

22 A. Correct.

23 SIR MARTIN MOORE-BICK: As Mr Millett was putting to you,
 24 why does it matter to you whether that material is
 25 compliant with the Building Regulations or not?

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1 A. It would probably be more a concern if it was a project
 2 that we were designing.

3 SIR MARTIN MOORE-BICK: Ah, yes, that's --

4 A. As opposed to somebody saying, "Can you fabricate this
 5 panel". In some cases we may not know what the building
 6 is or -- you know, if we get a panel schedule through,
 7 for instance, that's just a series of panels with
 8 a particular size and shape to them. So if we are
 9 providing our own work with our own design, then we
 10 would ensure that, you know, it met the
 11 Building Regulations.

12 SIR MARTIN MOORE-BICK: I understand that, certainly.
 13 Thank you.

14 MR MILLETT: Yes, thank you.

15 Now, if we look at page 5 of your witness statement
 16 {CEP00064247/5}, I would like to look at paragraph 23.
 17 We're still on page 5 in fact. You say under the
 18 heading "Reynobond ACM with a PE core":
 19 "I understand that this product is class 0
 20 performance."

21 At paragraph 24, under the heading "Reynobond with
 22 an FR core", you distinguish PE from FR.

23 When you say you understand that this product,
 24 that's the PE core in paragraph 24, is class 0, where
 25 did that understanding come from?

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1 A. Err ...

2 SIR MARTIN MOORE-BICK: Mr Millett, I'm sorry to interrupt
 3 you, but I think is Mr Blades not speaking in
 4 paragraph 24 of the FR core?

5 MR MILLETT: Yes, I have gone back to paragraph 23.

6 SIR MARTIN MOORE-BICK: Ah, right. I'm not sure that was
 7 clear.

8 MR MILLETT: That's my fault, I apologise.

9 Looking at paragraph 23, then, just focusing on
 10 that, you say:
 11 "I understand that this product is class 0
 12 performance."

13 My question is: where did that understanding come
 14 from?

15 A. I would have heard that in conversation.

16 Q. Right. Did you ever see any documents?

17 A. Or it would be referenced in the BBA.

18 Q. The BBA, all right. Well, we'll come to that later on
 19 in your evidence.

20 What about the FR product under paragraph 24? You
 21 say:
 22 "As far as I am aware, this product is class 0 fire
 23 performance."

24 Again, where did that understanding come from?

25 A. Again, I would have heard that in conversation and

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1 possibly from some documentation.

2 Q. Can we look at the bottom of that page. You can see

3 that it says, under a heading "Reynobond with cores of

4 different colours (for example, translucent or black)",

5 at the bottom of the page you say:

6 "As far as I am aware, these are class 0 and I am

7 not aware of any price differences."

8 What do you mean by that? What do you mean, "I am

9 not aware of any price differences"?

10 A. I wasn't aware that the colour of the core had a price

11 difference.

12 Q. Oh, I see, right. Were you aware of any difference in

13 price between PE and FR?

14 A. I am now, but at the time I wasn't aware, other than

15 going back to, say, the Alucobond 3A, that there was,

16 no.

17 Q. If you go to page 6 {CEP00064247/6} of this statement,

18 we can see a question or sub-question in italics there,

19 or heading:

20 "Reynobond that is face (riveted) fixed to

21 buildings."

22 You there say:

23 "As far as I am aware, this is class 0 and I am not

24 aware of any price differences."

25 Again, are you saying that there is no price

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1 difference between face-fixed and cassette?

2 A. No, I think what is being said there is there is no

3 price difference between the Reynobond product, whether

4 it's face-fixed or formed into a cassette.

5 Q. I see. Price difference to --

6 A. The material.

7 Q. I see, so price difference for you?

8 A. Yes.

9 Q. Buying from Reynobond?

10 A. Yes.

11 Q. I see. But there would be a price difference for the

12 end buyer?

13 A. Correct.

14 Q. Yes.

15 Can we just stick with this. You are saying here

16 that, as far as you are aware, Reynobond face-fixed was

17 class 0, but you don't mention here what you know about

18 the fire classification of the Reynobond cassette

19 system.

20 What did you understand the fire classification of

21 the cassette-fixed Reynobond to be as at 2013?

22 A. I would understand it to be a class 0, as it's the same

23 material.

24 Q. Were you aware of any classification differences between

25 face-fixed and cassette-fixed Reynobond?

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1 A. No.

2 Q. You mentioned the BBA certificate a moment ago in your

3 evidence. I want to start on that topic, just

4 generally. We will come to it in more detail later on,

5 but I just want to ask you about it generally.

6 Were BBA certificates asked for by building

7 professionals, so far as you are aware, when considering

8 what cladding materials to use on the building?

9 A. Occasionally, yes.

10 Q. And was it your experience that the detailed information

11 contained in a BBA certificate would routinely be

12 considered by those building professionals, architects

13 or cladding subcontractors?

14 A. I would believe so, yes.

15 Q. Right.

16 Did you ever get any questions yourself asked to you

17 about the details contained in BBA certificates?

18 A. Not that I recall.

19 Q. Do you know what status the BBA certificate for,

20 for example, Reynobond PE-cored ACM had in the industry?

21 What status it had, how important was the

22 BBA certificate?

23 A. I don't know, I'm not aware of that.

24 Q. Right.

25 Were you asked to provide the BBA certificates

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1 yourself, or in your experience was that something that

2 architects or buyers would ask directly of the

3 manufacturer?

4 A. Sometimes they may ask for it through ourselves.

5 Q. Right.

6 A. Or they may take it direct from whoever they require

7 that information from.

8 Q. Right.

9 Would you supply the BBA certificate to your

10 customer, your end buyer, as part of the contract

11 package?

12 A. If we were asked to, yes.

13 Q. Right.

14 Did the fact that the panel had a BBA certificate

15 help you market the products which were the subject of

16 them?

17 A. Not particularly, no.

18 Q. Right.

19 Can we go to your second witness statement at

20 page 14 {CEP00064247/14}, and I want to ask you some

21 questions about what you knew about fire safety test

22 results.

23 At the top of page 14, you can see that you're asked

24 a question in the context of your first statement where

25 it says:

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1 "... you state that Deborah French provided Harley
2 (and you) a copy of the BBA Certificate 08/4510 for
3 Reynobond cladding."
4 This is the question.
5 "Prior to this, were you aware of the BBA
6 certification of Reynobond and in particular its fire
7 performance rating?"
8 Your answer is:
9 "Yes, I was aware of the certification and by
10 default its fire rating as class 0."
11 What did you mean there by "by default"?
12 A. Just the fact that I was aware that the product was
13 class 0.
14 Q. Well, that doesn't quite answer the question. You used
15 the words "by default its fire rating as class 0". Can
16 you just explain what you mean in that sentence, looking
17 at the question that you were asked?
18 A. Other than I would have seen the class 0 rating within
19 the BBA certificate.
20 Q. I see. So do you mean there, because you knew of the
21 certification, ergo -- I'm sorry to use that word -- you
22 knew it was class 0 or thought it was class 0?
23 A. Yes.
24 Q. In other words, you took the certificate at face value?
25 A. Yes.

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1 Q. Yes.
2 Now, at paragraph 67 you say, under the question
3 "What did you understand 'Class 0' to mean and what did
4 you think its significance was?":
5 "I understood that 'Class 0' meant that the product
6 was of limited combustible nature linked to surface
7 spread of flame. I understood that it met the required
8 standards of the building regulations."
9 What did you mean there by "limited combustible
10 nature linked to the surface spread of flame"?
11 A. It didn't instantly ignite, it had a limited amount of
12 combustibility.
13 Q. Right. What was the source of your understanding that
14 class 0 meant a limited combustible nature?
15 A. Could you re-ask the question, please?
16 Q. Yes. You say:
17 "I understood that 'Class 0' meant that the product
18 was of limited combustible nature ..."
19 How did you come to that understanding? How did you
20 learn that?
21 A. I don't recall. Maybe it's something that was probably
22 said within the office at the time -- at some point, or
23 became aware of it through general office conversations
24 or industry conversations.
25 Q. Right.

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1 You say that you understood that it met the required
2 standards of the Building Regulations; how did you come
3 to that understanding, do you think?
4 A. Again, I don't recall particularly how I came by that.
5 Q. Right. Did you have a working knowledge of the
6 Building Regulations?
7 A. No.
8 Q. Can we go to {CEP000000148}, please. This is CEP's
9 quotation from February 2013 to Leadbitter for the
10 Grenfell Tower project, and it's in fact signed by you.
11 I don't think we need to see that, but if you go to the
12 top of the page, you can see it's sent to Mohit Kotecha
13 at Leadbitter, dated 4 February 2013, and you are
14 quoting there in the second paragraph for:
15 "Rainscreen Overcladding, panels and column casings
16 are to be [manufactured] utilising 4mm Reynobond 'Zinc
17 Patina paint finished' ACM ..."
18 You see that?
19 A. Yes.
20 Q. Then you say towards the bottom of the page:
21 "Reynobond ACM panels achieve the following:-
22 class 0 BS 476 Part 6 and class 1 BS 476 part 7.
23 "Reynobond ACM achieves BBA accreditation."
24 Where did you get that information from, do you
25 think?

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1 A. I don't recall.
2 Q. It's not something that you would have had in your head,
3 is it, or maybe it was?
4 A. I was aware that Reynobond had a BBA certification, and
5 I was aware that it met class 0.
6 Q. Yes, but you go on to say "class 0 BS 476 Part 6 and
7 class 1 BS 476 Part 7". That's quite technical. My
8 question is: is that something you knew, as it were, off
9 by heart, off the top of your head, or did you have to
10 look at a document to put those technical details in
11 there?
12 A. I would have been advised that somewhere by some --
13 I couldn't answer that.
14 Q. Right.
15 A. It's just something that I was aware of. How I came by
16 it, I can't recall, and we just put it in the doc -- in
17 that letter.
18 Q. Right.
19 Did you realise that the BBA certificate for
20 Reynobond doesn't actually say that the PE-cored ACM,
21 the standard sample, passed those particular tests, only
22 the FR panel had achieved class 0 in testing to BS 476-6
23 and 7?
24 A. No, I didn't.
25 Q. Right.

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1 Did you know what BS 476-6 and BS 476-7 results
2 meant when you set them out in your quote here?
3 A. I had a brief understanding of what the two parts were.
4 Q. Right. And what was that?
5 A. I think the part 6 was the time it took for a panel to
6 ignite, and part 7 was how far it spread in a given set
7 time.
8 Q. Right, and is that something you knew from looking at
9 documents or something you just gathered as part of your
10 experience?
11 A. I would have been told it or gathered it through my
12 experience, yes.
13 Q. Right. Did you ever do any training on the
14 Building Regulations and --
15 A. No.
16 Q. -- fire testing and classification?
17 A. No.
18 Q. Right.
19 Did you know that in fact it's not correct that the
20 ACM PE panels had achieved a class 0 476 part 6 and
21 part 7 test?
22 A. No.
23 Q. Right.
24 Did customers ever ask for details or reports of
25 BS 476 fire performance testing, whether part 6 or

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1 part 7 or both?
2 A. Not that I'm aware of.
3 Q. What about European classifications?
4 A. Again, not that I'm aware of.
5 Q. What about certification to BR 135 criteria --
6 A. Not that I'm aware of.
7 Q. -- so far as involved --
8 A. Not that I recall.
9 Q. Did you ever read BR 135 --
10 A. No.
11 Q. -- which deals with insulation? No.
12 Did you have any knowledge of BS 8414 tests?
13 A. No.
14 Q. If a customer had asked you about whether a particular
15 product, whether it was insulation or rainscreen panels,
16 had passed fire tests and classification, would you have
17 answered yourself or would you have referred to somebody
18 else?
19 A. I would have referred it back to somebody else.
20 Q. Who would you have referred it to, do you think?
21 A. It could be the material supplier or maybe Mark Heywood
22 Associates.
23 Q. And would Mark Heywood Associates be, as it were,
24 an in-house source of that kind of information that you
25 could just tap?

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1 A. He could probably answer the question. He may have
2 documentation that would answer the question.
3 Q. I see. And he was a resource for you, you would use
4 regularly, or was available to you at least?
5 A. Yes, he was available if we needed to ask him questions.
6 Certainly if the project was an in-house design project.
7 MR MILLETT: Yes, I see.
8 Mr Chairman, I have about four or five more
9 questions on this topic before changing topics.
10 SIR MARTIN MOORE-BICK: Why don't you finish them?
11 MR MILLETT: That would be convenient, thank you.
12 Can we go back, then, to our discussion about the
13 CEP design system in the light of what we've just been
14 talking about in design terms.
15 Can I go, please, to {CEP00057377}. This is
16 an email from Roy Fewster in May 2016, subject:
17 "Cladding fire test reports", and the attachments you
18 can see there. Roy Fewster says:
19 "Finally !!!"
20 Just help me, is this an internal email? It looks
21 as if it is.
22 A. It is, yes.
23 Q. "Finally !!! please find attached BR135 testing
24 certification."
25 This is a test or certification which comprises

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1 a BR 135 report and a BS 8414 report about a CEP system
2 with, as it turns out, a Petrach panel.
3 Were you aware yourself of the fire safety testing
4 done on that system?
5 A. No.
6 Q. No.
7 Did you personally appreciate at the time of the
8 supply of the rainscreen panels on the Grenfell Tower
9 project how cladding systems could comply with the
10 applicable provisions of the Building Regulations and
11 Approved Document B?
12 A. No.
13 Q. Now, looking at this email, would you accept that there
14 were at least some people within CEP -- so Neil Wilson,
15 your line manager, and Roy Fewster, your ex-line
16 manager, I think -- that did appreciate the need for
17 cladding systems which were sold by CEP to be fire
18 tested?
19 A. Yes.
20 Q. Was that new as at the date of this email, so 2016, or
21 was that always the case before that?
22 A. I think this would be new.
23 Q. What was the reason for that being new? Was there a new
24 concern or a new requirement?
25 A. I'm not sure. I'm not aware of that, so I can't answer

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1 that.
 2 Q. Did CEP obtain fire test data such as this for all
 3 systems supplied to it by end users?
 4 A. Not that I'm aware of.
 5 Q. Right. So that wouldn't have included supply of ACM
 6 panels for the Grenfell Tower project, presumably?
 7 A. Not that I'm aware of, no.
 8 Q. Is there a reason why there is that distinction? You
 9 would get a fire test or certification for the system we
 10 see in 2016 but not for the supply of the ACM panels to
 11 Grenfell.
 12 A. Not that I'm aware of.
 13 Q. Do you know any reason why that is?
 14 A. I don't know.
 15 MR MILLETT: Mr Chairman, that may be a convenient moment.
 16 SIR MARTIN MOORE-BICK: Right, thank you very much.
 17 Well, Mr Blades, we're going to have a short break
 18 now. I'm going to ask you to go with the usher and come
 19 back at 11.40.
 20 Please, while you're out of the room on this and any
 21 other later occasions, don't talk to anyone about your
 22 evidence or anything to do with it.
 23 THE WITNESS: Okay, thank you.
 24 SIR MARTIN MOORE-BICK: All right? Thank you.
 25 Would you like to go with the usher, please.

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1 Thank you.
 2 (Pause)
 3 11.40, then, please. Thank you.
 4 (11.23 am)
 5 (A short break)
 6 (11.40 am)
 7 SIR MARTIN MOORE-BICK: All right, Mr Blades, are you ready
 8 to carry on?
 9 THE WITNESS: Yes.
 10 SIR MARTIN MOORE-BICK: Good, thank you very much.
 11 Yes, Mr Millett.
 12 MR MILLETT: Mr Chairman, thank you.
 13 Mr Blades, I would like to ask you some questions
 14 now about the Chalcots Estate project. That's
 15 a project, isn't it, where CEP supplied Reynobond panels
 16 in London?
 17 A. Correct.
 18 Q. Camden Town.
 19 First of all, the contractors on the project were
 20 Rydon, weren't they?
 21 A. Correct.
 22 Q. And Harley was the cladding subcontractor.
 23 A. Correct.
 24 Q. And Arconic supplied the Reynobond cladding.
 25 A. Correct.

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1 Q. And I think you told us earlier this was the first time
 2 CEP had worked with Arconic, then Alcoa.
 3 A. I believe so, correct, yes.
 4 Q. And Harley did the design for the cladding at Chalcots,
 5 didn't it?
 6 A. Correct.
 7 Q. Were you aware that Chalcots had a 4-millimetre ACM
 8 panel face-fixed and had a Rockwool Duoslab insulation
 9 behind it within the system?
 10 A. I was, yes.
 11 Q. The ACM that was used on that project was a Reynobond
 12 ACM with a PE core.
 13 A. Correct.
 14 Q. Do you recall who specified the rainscreen material for
 15 that project?
 16 A. I don't. There was a problem with the initial ACM that
 17 was on the buildings.
 18 Q. Yes, Etalbond.
 19 A. Etalbond, and then I don't know who then came back and
 20 specified Reynobond.
 21 Q. Right. Do you remember whether it was the architect or
 22 whether it was Harley who specified Reynobond?
 23 A. I don't, no.
 24 Q. Do you remember whether it was you who recommended
 25 Reynobond?

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1 A. It wasn't me.
 2 Q. It wasn't you.
 3 Now, do you remember that in January 2012 there was
 4 a fire in one of the Chalcots tower blocks, namely
 5 Taplow House? Does that ring a bell with you?
 6 A. Yes, it does.
 7 Q. There was a report done by Harley of that fire,
 8 an incident report. Do you remember that? Have you
 9 seen it?
 10 A. I haven't seen it, no.
 11 Q. You haven't. I see.
 12 Can I show it to you. We can go to the offline
 13 reference to it, which is {CEP000003222}, please. This
 14 is the email chain with the abseil report attached to
 15 it, and I'll just show you the bottom of the first page.
 16 A. Okay.
 17 Q. You can see that you were copied in to an email below
 18 that which forwarded the report.
 19 So we start with the email from Roy Fewster to you
 20 at the bottom of page 1, and the subject is
 21 "FW: Taplow House Fire Damage". Do you see that? We're
 22 looking at page 1, the second email on that page.
 23 A. Yes.
 24 Q. That comes from Roy Fewster to Neil Wilson and
 25 Steve Roberts.

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1 A. Yes.
 2 Q. Then immediately above that --
 3 A. Yeah.
 4 Q. -- just below the line, Steve Roberts sends that to
 5 Roy Fewster and copies you.
 6 A. Correct.
 7 Q. You see that?
 8 A. Yes.
 9 Q. As well as Neil Wilson.
 10 A. Yeah.
 11 Q. Right.
 12 Let's just then look below at the email which starts
 13 on page 2 {CEP000003222/2} in substance. The very start
 14 of it is at the bottom of page 1, the substance of it is
 15 on page 2:
 16 "Hi Roy,
 17 "Please see attached a report with regard to the
 18 fire damage at Taplow House Camden.
 19 "We have now been told that they want us to get on
 20 with the repair/replacement work."
 21 It goes on to detail that the damage is 17 storeys
 22 up in the air, and "we have proposed replacing all the
 23 damaged panels", and then in the next paragraph:
 24 "We would need you to provide the Reynobond, rails
 25 and windows."

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1 Just looking at that email chain, would you accept
 2 that, historically, you were copied in to an email which
 3 forwarded the report attached by Ray Bailey to
 4 Roy Fewster in July 2012?
 5 A. Yes.
 6 Q. Thank you. Did you read that report?
 7 A. I may have done at the time. I don't recall.
 8 Q. Right.
 9 Let's look at page 2 {CEP000003223/2}. You can see,
 10 if we go to page 2, that it says, in the second
 11 paragraph:
 12 "The Damage was clearly evident internally, with
 13 extensive damage to the fabric of the building
 14 structure, which included damage to the concrete frame
 15 which exposed rebar to the ceiling."
 16 Do you see that?
 17 A. Yes.
 18 Q. Then if you go on, it says at the very bottom of the
 19 page:
 20 "However, the fire was contained from spreading to
 21 over floors by the extensive fire breaks located at the
 22 head and cill of each window. Smoke damage caused
 23 further damage to the external cladding and cavity."
 24 Now, do you remember reading that at the time when
 25 you got this report in June 2012?

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1 A. I don't recall reading it, but --
 2 Q. Right.
 3 A. -- I probably will have done if my name's -- it's been
 4 forwarded to me, but I don't recall it.
 5 Q. Yes.
 6 After that fire, did you think about the extent to
 7 which the cladding had contributed to the damage caused
 8 by the fire?
 9 A. No, I don't recall.
 10 Q. Did you or anybody else at CEP consider any lessons to
 11 be learned from the Taplow House fire?
 12 A. Not that I'm aware of.
 13 Q. Did the fact that this fire had taken place and the
 14 Reynobond had performed in the way it did not prompt you
 15 to consider its safety from a fire perspective?
 16 A. It didn't me personally, no.
 17 Q. Did anybody else at CEP?
 18 A. I can't say, I don't know.
 19 Q. Was there no discussion within CEP about the safety of
 20 the Reynobond product from a fire safety perspective?
 21 A. Not that I recall.
 22 Q. Right.
 23 Can we look at the statement of Mr Wehrle of
 24 Arconic, please. This is {MET00053190/29}, please, and
 25 look at paragraph 103. He says at the bottom of that

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1 page there:
 2 "As far as I am aware, my only contact with Rydon
 3 prior to the Grenfell Tower fire was in relation to a
 4 separate project where Reynobond product had been fitted
 5 on a project at Camden in London (the Chalcots Estate)."
 6 Then he says this:
 7 "I was asked by Vince Meakins to attend a site visit
 8 with himself and two people from Rydon (Alim Whyte and
 9 Steve Blake) on 4 May 2017 in relation to a delamination
 10 issue allegedly affecting some panels fitted to those
 11 blocks. During that meeting we walked around the
 12 perimeter of all the tower blocks at the Chalcots Estate
 13 and the technical delamination matter was discussed. A
 14 sample of the material from one of the towers was taken
 15 by one of the Rydon representatives and provided to me
 16 for further review."
 17 Then he says this:
 18 "During the course of that site visit I expressed to
 19 the two Rydon representatives surprise to see a number
 20 of buildings of such height with ACM PE cladding
 21 material rather than an FR product. The Rydon
 22 representatives commented that the relevant UK
 23 regulations allow the use of ACM PE products in such
 24 scenarios. I did not make any further enquiries
 25 relating to UK regulations following this comment by

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1 Rydon."
 2 Now, first of all, were you aware of this visit made
 3 by Mr Wehrle to Chalcots in May 2017?
 4 A. I don't recall being aware of it, no.
 5 Q. Right. Did you ever meet Mr Wehrle at any stage?
 6 A. No.
 7 Q. Right.
 8 Can we then turn to CEP's role in the specification
 9 of Reynobond ACM from 2012, and I would like to start,
 10 if I may, in March 2012 with the initial meetings in
 11 relation to Grenfell Tower.
 12 Can we go to {CEP000000043/2}. This is an email of
 13 29 March. It's an email run that ends on 4 April in
 14 this document but starts on 29 March. At the very
 15 bottom of page 2 we can see that Bruce Sounes sends you
 16 an email on that day:
 17 "Grenfell Tower upgrade - meeting 4 April @ 11am."
 18 That's the subject, and he says:
 19 "Hi Geof,
 20 "Please see our address and details below.
 21 "I appreciate you coming in. We are currently
 22 working at risk for Kensington until funding is
 23 secured."
 24 Then he asks you in the next -- well, I'll show it
 25 to you:

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1 "The intention is to procure the project as an
 2 add-on to the neighbouring project, the Kensington
 3 Academy and Leisure Project.
 4 "Please could you bring pictures or drawings of the
 5 Enfield Homes project? I think it will be a useful
 6 reference when discussing it with our client. (I think
 7 I could see the Enfield towers from the roof of
 8 Grenfell. See attached)."
 9 Do you know whether there were any communications
 10 between you and Studio E that preceded this one?
 11 A. No.
 12 Q. Do you know who effected the introduction?
 13 A. I believe that Studio E contacted the office, CEP's
 14 office.
 15 Q. Do you know how Studio E came by CEP?
 16 A. I don't, no.
 17 Q. Now, you became aware at this point that Studio E was
 18 the architect for the Grenfell Tower project.
 19 A. Correct.
 20 Q. Is it right that from the very outset you therefore knew
 21 that Grenfell Tower was a high-rise building?
 22 A. Correct.
 23 Q. In other words, over 18 metres in height.
 24 A. Correct.
 25 Q. Can I ask you to go to {MAX00002709/1}, please. This is

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1 an email from Bruce Sounes of Studio E on 29 March 2012,
 2 so the same day as the email I've just shown you to you,
 3 and it's to Mark Anderson at the TMO, copied to people
 4 at Max Fordham and Curtins Consulting and others,
 5 subject: "Grenfell Tower upgrade". Do you see that?
 6 A. Yes.
 7 Q. It looks from this that he had set up a meeting with you
 8 to discuss budget and options. If you look at the third
 9 paragraph down, he says in that paragraph in the second
 10 sentence:
 11 "I have set up a meeting here with CEP [and provides
 12 a web address] ... next week Wednesday to discuss
 13 options and budgets for the overcladding."
 14 Did you understand that the purpose of Mr Sounes
 15 seeking a meeting with CEP was to discuss options and
 16 budget for overcladding?
 17 A. Yes, it was to -- yeah, I wasn't aware he was looking
 18 for budgets, but possibly, yes.
 19 Q. Yes.
 20 Do you remember whether a meeting did take place in
 21 that following week, in other words the week after the
 22 week in which 29 March sat?
 23 A. No, I couldn't make it on the 4th, if that was the week
 24 after.
 25 Q. Yes.

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1 A. Inclement weather, and I arranged to go down the week
 2 after, I think it was the 11th.
 3 Q. Now, if we can go back to {CEP000000043}, we can see how
 4 the email run with Studio E pans out.
 5 At the top of that page, we have Markus Kiefer of
 6 Studio E's email to you on 4 April, the original date
 7 for the meeting, and you're right, because in the second
 8 email down from that you email him that day to apologise
 9 for the English weather and the meeting is postponed to
 10 the 11th.
 11 Then in Markus Kiefer's email to you, he says in the
 12 second paragraph:
 13 "Since we [have] a further meeting with the client
 14 on the morning 09.04.12 we would appreciate your initial
 15 thoughts regarding the appropriate cladding systems and
 16 the rates associated with them."
 17 What did you understand Mr Kiefer to mean by
 18 "appropriate cladding systems" there?
 19 A. What system we could offer and, you know, what CEP had
 20 to offer in relation to Grenfell Tower.
 21 Q. Right.
 22 A. Or to a tower block.
 23 Q. Now, at that stage, was there any discussion or
 24 thinking, either between you and Studio E or internally
 25 at CEP, as to whether it would be a bespoke full-blown

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1 tailor -made system or just supply of individual
2 components?
3 A. We would have thought it could have -- or hoped it would
4 have been a full complete system.
5 Q. Right. And is that because you would make more money
6 on it?
7 A. No, it's because what we do, we supply, or that then we
8 supplied a full complete system.
9 Q. Can we then go to your second witness statement at
10 page 8 {CEP00064247/8}, and I would like to go to
11 paragraph 40 as we see there. You say:
12 "I responded to Bruce Soules at Studio E on
13 5 April ..."
14 Halfway down you say:
15 "I did not consider that this was a request for
16 advice and was merely providing information at this
17 stage."
18 But the question I have is: didn't you understand
19 Mr Kiefer to be asking for advice about what cladding
20 would be appropriate for Grenfell Tower?
21 A. He asked me for my initial or our initial thoughts, and
22 whether that was advice or enquiring what we offered,
23 I just took it as a general enquiry to what we could
24 offer.
25 Q. You say, "I didn't consider that this was a request for

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1 advice", and my question is: why not?
2 A. Well, maybe I did, or just the way I read it as it was
3 just a, you know, what can we offer. Whether that was
4 classed as advice or our thoughts or -- you know,
5 I didn't read too much into it until I met the
6 gentleman.
7 Q. Did you tell Mr Kiefer that you couldn't personally or
8 corporately advise on an appropriate cladding system?
9 A. I didn't tell him that, no.
10 Q. Did you tell him that CEP would have to engage
11 a designer, such as Mark Heywood Associates, in order to
12 provide the advice he was after?
13 A. I don't recall if I did at that stage.
14 Q. Okay.
15 Now, we can see, if we go to {CEP000000043}, that in
16 his response of 4 April, Mr Kiefer attached some floor
17 plans as well as the south elevation and some photos.
18 You see that in the first paragraph of his email?
19 A. Yes.
20 Q. Now, I'm sorry to jump around, if we go back to
21 paragraph 41 of your second statement, page 8
22 {CEP00064247/8}, you say there at the bottom of the
23 page:
24 "I would not have given any advice because we were
25 not aware of a specification."

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1 Now, in fact, Markus Kiefer's email did attach, as
2 I've shown you, floor plans for the south elevation and
3 photos of the tower, so you were given specifications,
4 weren't you?
5 A. I don't think it was a specification for materials or
6 products. I think it was an outline of what the
7 building was, rather than requesting specification of
8 materials.
9 Q. Well, what do you mean when you say that you weren't
10 aware of a specification?
11 A. A specification to me would be where they specified
12 particular materials, what cladding panels, for
13 instance, windows, for instance, what they want to
14 achieve. I don't recall that what Markus sent through
15 had a sort of specification as such.
16 Q. Right. But given that you were sent indicative existing
17 floor plans and the south elevation and some
18 photographs, was that not enough detail for you to be
19 able to provide at least some information or advice on
20 an appropriate cladding system, as Mr Kiefer had asked
21 for?
22 A. Yes.
23 Q. So why didn't you go back to him with some advice or
24 information about an appropriate cladding system?
25 A. I believe we sent him some indicative details down, but

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1 no rates were given.
2 Q. Right. Did you consider that what you had from him was
3 not enough?
4 A. Sorry?
5 Q. Did you think that what you had received from Mr Kiefer
6 was not enough for you to be able to advise him on
7 an appropriate cladding system?
8 A. I believe that the stuff -- the information we sent down
9 was so he could attend a meeting prior to me meeting
10 them to get more information of the project.
11 Q. Right.
12 SIR MARTIN MOORE-BICK: I wonder whether we're getting a bit
13 caught up on the word "advice", which may have different
14 connotations to different people.
15 MR MILLETT: Yes.
16 SIR MARTIN MOORE-BICK: My understanding of the position,
17 Mr Blades, is that CEP was asked to give an indication
18 or make a proposal.
19 A. Yes.
20 SIR MARTIN MOORE-BICK: Is that what you understood?
21 A. That's the way I would see it, yes. Thank you, yes.
22 SIR MARTIN MOORE-BICK: But I also understand that you would
23 not propose something you didn't think was suitable.
24 A. Correct.
25 SIR MARTIN MOORE-BICK: So you were providing information

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1 about what you could do on the basis that you thought it
 2 was a suitable thing to offer?
 3 A. Yes, correct.
 4 SIR MARTIN MOORE-BICK: Right.
 5 Are you trying to get at more than that, Mr Millett?
 6 MR MILLETT: Well, no, I want to know whether or not what
 7 Mr Kiefer had given you was sufficient for you to be
 8 able to do what he had asked you?
 9 A. I ... no, probably not, other than giving indicative
 10 details of what he was looking at.
 11 Q. Right.
 12 A. I can't recall every detail that we got through. I do
 13 recall that there was a picture of the elevation, but,
 14 you know, I'm not sure exactly what he sent through at
 15 this moment in time.
 16 Q. We don't see that you went back to Markus Kiefer and
 17 told him that you needed more information or a specific
 18 spec in order to provide the thoughts he had asked you
 19 for.
 20 A. Well, I believe I was going to a meeting a week later.
 21 Q. I see. So you would do it at that stage, would you?
 22 A. Yes, yeah.
 23 Q. Let's go to {CEP000000054}. This is an email you wrote
 24 on 5 April to Bruce Soune, so the day after seeing
 25 Markus Kiefer's email, and you send him 15 pdfs, which

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1 are drawings showing a cladding system.
 2 A. Correct.
 3 Q. So just pausing there, you did actually send some design
 4 information or detailed technical information on
 5 cladding to Mr Soune in response to the request.
 6 A. Yeah, in response to Markus Kiefer's request, yes.
 7 Q. Yes.
 8 Let's go to one of those attached drawings. It's
 9 {CEP000000059}, please. This is a drawing by MHA,
 10 Mark Heywood Associates, from January 2008 -- we can
 11 just see that --
 12 A. Yes.
 13 Q. -- at the bottom right-hand corner -- of a typical
 14 window cill detail at Stretford House, which was
 15 a project where MHA's client seems to have been CEP
 16 Architectural Façades.
 17 Stretford House was a 66-metre, 23-floor residential
 18 high-rise, wasn't it?
 19 A. I don't know the height of it, but yeah, it was a tall
 20 building, yes.
 21 Q. A tall building, over 18 metres at any rate?
 22 A. I would think so, yes.
 23 Q. This is a cill detail.
 24 In the bottom corner tags we can see the product,
 25 can you see that? And the rainscreen is 4-millimetre

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1 thick PPC aluminium composite panel.
 2 A. Correct.
 3 Q. Does PPC mean polyester powder coated?
 4 A. It does, yes.
 5 Q. And ACM we know, aluminium composite we know, and it
 6 shows a rivet, doesn't it?
 7 A. Yes.
 8 Q. And for what it's worth, while we're on it, Rockwool
 9 Duoslab insulation.
 10 A. Correct.
 11 Q. Before you sent those drawings to Mr Soune, did you
 12 pass the query that you had received from Markus Kiefer
 13 to MHA to ask him what suitable cladding systems or what
 14 drawings he should provide, or you should provide?
 15 A. I don't recall whether I asked Mark for them or whether
 16 they were available within CEP to send down. If they
 17 weren't available within the sort of CEP file documents,
 18 I would have asked Mark to forward them to me.
 19 Q. Right.
 20 Do you accept that by sending these drawings of past
 21 projects such as Stretford House to Studio E, you were
 22 giving Studio E the impression that you were willing to
 23 give advice on suitable cladding systems for
 24 Grenfell Tower?
 25 A. In the future, yes, probably.

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1 Q. Yes, and as part of that to be advising that ACM
 2 cladding could safely be used on Grenfell Tower?
 3 A. Can you just rephrase that, please?
 4 Q. Yes, and as part of that exercise -- providing them with
 5 indications of suitable appropriate cladding systems --
 6 that ACM as the rainscreen could be used safely on
 7 Grenfell Tower?
 8 A. I believe so, yes.
 9 Q. Yes.
 10 Now, on 11 April -- you referred to that date
 11 earlier -- you I think did go for a meeting with
 12 Bruce Soune and Markus Kiefer of Studio E?
 13 A. Correct.
 14 Q. Was that on site at Grenfell Tower?
 15 A. It was, yes.
 16 Q. Did you discuss rainscreen cladding?
 17 A. I don't recall, but we probably would do because that
 18 was the purpose of the visit, to discuss the CEP
 19 products.
 20 Q. I see. You say the purpose of the visit --
 21 A. Was to discuss what they was looking for, for
 22 Grenfell Tower.
 23 Q. Appropriate cladding systems?
 24 A. Yes.
 25 Q. I see. Did you understand that to be an entire system

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1 or just the rainscreen element?
 2 A. The entire system.
 3 Q. Right. So can you tell us what products you discussed
 4 at that meeting?
 5 A. I don't recall what products in particular.
 6 Q. Right. Did you discuss ACM?
 7 A. I don't recall.
 8 Q. Right.
 9 Can we move on in time, then, to October 2012, and
 10 start there with your second witness statement,
 11 {CEP00064247/6}. I want to show you paragraph 32,
 12 please. You can see that at 32, under the heading "Use
 13 of Reynobond 55 on Grenfell Tower", you say in the
 14 second sentence:
 15 "I introduced Deborah French of Arconic to Studio E
 16 as being the representative of Arconic who could
 17 demonstrate their products, however I had no involvement
 18 in the discussions."
 19 So is it right that, just looking at that, Arconic
 20 came to be involved in the Grenfell Tower project
 21 because CEP introduced them to it?
 22 A. Correct.
 23 Q. Now, I think you had a meeting with Studio E on
 24 16 October 2012.
 25 A. Correct.

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1 Q. And we can see an email, {CEP000003961}, please. This
 2 is an email of 9 October 2012, from you to Bruce Sounes
 3 on that day, subject: "Grenfell Tower":
 4 "Hi Bruce,
 5 "Just to confirm our earlier telephone conversation
 6 ref the above. That myself and Debbie French of
 7 Reynobond will meet at your office next Tuesday 16th Oct
 8 11-30 to discuss Zinc rainscreen."
 9 Now, first, was that meeting, to your knowledge, the
 10 first meeting that Deborah French had with Studio E?
 11 A. To my knowledge, yes.
 12 Q. Did Bruce Sounes ask for that meeting, in other words
 13 a meeting with Deborah French, or did you and
 14 Deborah French suggest it to Bruce Sounes?
 15 A. I would have suggested it to Bruce Sounes to introduce
 16 Reynobond or their zinc product to them, because CEP
 17 didn't have a zinc product.
 18 Q. CEP didn't have --
 19 A. We'd never worked with the zinc.
 20 Q. I see. I'm going to come back to that in a second,
 21 because I'm interested in the zinc, but before I get
 22 there, can I ask you: why did you only bring
 23 Deborah French of Arconic to that meeting and not any
 24 representative of any other manufacturer of panels?
 25 A. Because I was aware, through either historic

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1 conversations or seeing a sample, that Reynobond had
 2 a zinc appearance finish to a panel, a zinc panel, or
 3 a zinc finish to a panel.
 4 Q. Did no other manufacturers have a zinc finish?
 5 A. I don't recall them doing, but I don't know.
 6 Q. What about VMZinc?
 7 A. I don't know them.
 8 Q. Right.
 9 A. I didn't know them at the time.
 10 Q. Did you think of looking around the manufacturers market
 11 to see if anybody else did a zinc product?
 12 A. No.
 13 Q. Right. So was your thought process: they want a zinc
 14 panel, I'll think of Debbie French, I'll take her to the
 15 meeting?
 16 A. No, they were looking for a zinc panel and I was aware
 17 that Reynobond had a zinc-finished panel.
 18 Q. Right.
 19 Did you take a note of this meeting, do you
 20 remember?
 21 A. I believe I did, yes.
 22 Q. Do you still have those notes?
 23 A. I don't think I do, no.
 24 Q. Have you looked for them?
 25 A. I know there was one in the documents.

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1 Q. Right.
 2 In terms of the cladding materials under discussion
 3 at the time of this meeting, obviously we can see from
 4 this email that Studio E was considering zinc as the
 5 material for the rainscreen.
 6 A. Correct.
 7 Q. Did you discuss zinc as a cladding option, zinc itself
 8 as opposed to a zinc finish?
 9 A. I didn't personally, no.
 10 Q. Right. Was there a discussion about any other finish
 11 other than zinc itself?
 12 A. In the meeting?
 13 Q. Yes, in the meeting.
 14 A. I believe so, yes.
 15 Q. What did you discuss?
 16 A. I think Reynobond or Debbie French discussed options
 17 where they can offer paint finish to replicate zinc.
 18 Q. Right. I see. So those were different options from
 19 a zinc finish.
 20 When you say a zinc finish was discussed, was that
 21 the zinc composite material?
 22 A. Yes, I became aware of how they produced that panel.
 23 They had a skin of zinc, a very thin sheet of zinc --
 24 Q. Right.
 25 A. -- that becomes bonded to a core, in there was

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1 an aluminium faced core.
 2 Q. Right.
 3 I think you told us earlier this morning that CEP
 4 didn't, as it were, do zinc.
 5 A. Correct.
 6 Q. And didn't do ZCM.
 7 Given that the purpose of the meeting, as we can see
 8 from this email, was to discuss zinc rainscreen, what
 9 did you think CEP's role would be in that?
 10 A. I guess I would have had a conversation with Bruce to
 11 explain that there was a product that we could offer
 12 that had a zinc finish to it. I didn't know
 13 particularly till I got there how they was viewing zinc
 14 in their opinion.
 15 Q. Oh, I see. Do I understand it this way: you thought you
 16 were going to the meeting to discuss a zinc finish?
 17 A. Yes.
 18 Q. In other words a non-zinc material got up to look like
 19 zinc?
 20 A. Or the building they required to have an appearance to
 21 zinc to the external face.
 22 Q. Right. I see.
 23 A. And the fact that, as I've just said, Reynobond had
 24 a product that had a zinc-appearance finish, the object
 25 of the meeting was to see if that was suitable.

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1 Q. Did it become clear to you at that meeting that
 2 Bruce Sounes wanted actual zinc, in other words the
 3 metal itself?
 4 A. It did, yes.
 5 Q. What did you think about that?
 6 A. I got the impression that he was open to options.
 7 Q. Could Arconic supply actual zinc?
 8 A. Not that I'm aware of, no.
 9 Q. Right.
 10 So given that Arconic didn't, as far as you know,
 11 supply actual zinc, other than perhaps a zinc composite,
 12 which you wouldn't cut anyway, and given that
 13 Bruce Sounes was after actual zinc, the real thing, how
 14 was that meeting left?
 15 A. Erm ... I don't recall particularly how it was left,
 16 other than I think they may have requested some samples
 17 of the zinc.
 18 Q. Right.
 19 A. I've a feeling that -- did you just mention VMZinc?
 20 Q. Yes.
 21 A. I think Debbie French knew the people at VMZinc and she
 22 was contacting them.
 23 Q. Right.
 24 A. You know, whether that was going down that particular
 25 road and we would have been out of the project, I can't

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1 recall.
 2 Q. Right.
 3 Why would Debbie French be promoting, perhaps -- if
 4 that's not too strong a word -- a material made by
 5 someone other than Arconic?
 6 A. I believe they used VMZinc to provide the zinc skin that
 7 went on their product.
 8 Q. I see, right. I see. So that's the sheet that goes
 9 on --
 10 A. The outer face of the panel, yes.
 11 Q. -- the outer face and the inner face --
 12 A. Yes.
 13 Q. -- of the ZCM product. But nonetheless, if that had
 14 been selected, you would have formed no part of the
 15 supply chain because you didn't cut zinc.
 16 A. Well, we could have provided that zinc panel, because we
 17 may not need to cut the zinc face.
 18 Q. I see.
 19 A. If it was a face-fixed panel, they would just drill and
 20 fix it to the rail system.
 21 Q. Right. But that would have been a first for CEP, would
 22 it?
 23 A. Yes, it would have been.
 24 Q. Yes, I follow.
 25 Was it your impression at the meeting that Ms French

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1 promoted the ACM product? When I say "the ACM product",
 2 I mean the ACM PE product.
 3 A. Yes.
 4 Q. Right. Over zinc?
 5 A. Over zinc ...
 6 Q. In other words, in preference to zinc.
 7 A. It was, I think -- no, I think she was promoting both
 8 the zinc finish and a traditional ACM.
 9 Q. When you say the zinc finish, do you mean --
 10 A. The zinc skin.
 11 Q. Of actual zinc --
 12 A. Yes.
 13 Q. -- rather than the finish got up to look like zinc?
 14 A. And I think it was down to the client or the architect
 15 as to how far that was going to be taken.
 16 Q. I see. So was it your impression, to summarise it, that
 17 Debbie French promoted the ACM and the ZCM manufactured
 18 by Arconic?
 19 A. Correct.
 20 Q. I've got it. Right.
 21 Can we then go to {CEP00048712}, please. This is
 22 an email from you to Deborah French on 16 November 2012,
 23 and you say to her:
 24 "Subject: Grenfell Tower.
 25 "Hi Debbs

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1 "Just spoke with Adrian Jess at Studio E, who we met
2 and, they're still going along the Rheinzinc(sic) route
3 but, still early days and no firm costs have been
4 provided regarding rainscreen!"

5 Did you mean there that Studio E was opting or
6 looking to opt for Rheinzink at this stage, in other
7 words a cladding that was not manufactured by Arconic?

8 A. Yes, I think they'd spoken to a business, Rheinzink, who
9 I'm not particularly aware of, but I believe there was
10 a zinc -- another zinc panel or sample that they
11 exhibited at the meeting on the day I was down there in
12 October.

13 Q. Yes, and when you say no firm costs have been provided
14 regarding rainscreen, did that indicate that it was
15 still possible that Arconic's ZCM or ACM might still be
16 specified?

17 A. I --

18 Q. Still in with a chance.

19 A. I would agree, yes.

20 Q. Did you suggest at any stage to Studio E, or for that
21 matter Rydon or Harley at a later stage, that Arconic
22 products would be cheaper than Rheinzink?

23 A. No.

24 Q. In this email, were you trying to encourage
25 Debbie French to continue to push for the sale of their

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1 ACM Reynobond product?

2 A. I was -- yes, we would probably -- you know, if
3 Reynobond got in the job, we would have an opportunity.

4 Q. Yes. I mean, clearly, if Rheinzink was selected, then
5 neither you nor she would be --

6 A. Correct.

7 Q. -- involved in the project. Therefore, it was
8 a benefit --

9 A. Certainly us. Certainly us. I can't speak for
10 Debbie French or Arconic on that matter.

11 Q. Well, Debbie French didn't supply the Rheinzink.

12 A. Correct.

13 Q. Yes.

14 Just thinking briefly about the differences between
15 ZCM as provided or made by Arconic and ACM, is ZCM more
16 expensive than ACM?

17 A. I don't know. We never priced the ZCM, so I don't know
18 what the cost was.

19 Q. Did you ever discuss the potential price of ZCM with
20 Deborah French at this stage?

21 A. Not that I recall.

22 Q. Right. So you never told Deborah French that ZCM would
23 be too expensive for the Grenfell Tower project?

24 A. I didn't, no.

25 Q. No.

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1 Can we then move to January 2013, and the quotation
2 that you supplied to Mohit Kotecha at Leadbitter. We
3 looked at this earlier on. I think you remember, at
4 least from what I showed you earlier, that you did
5 supply a quotation to them --

6 A. Correct.

7 Q. -- in January 2013, and I think it was followed up on
8 4 February, as we've seen, in the formal quotation.

9 Let's just see how that builds up. If you go first,
10 please, to {CEP00048886}. This is Mr Kotecha's email to
11 you of 24 January 2013, and if you look at the first
12 paragraph, he says:

13 "Geof,

14 "Nice to meet you today at the Baseline offices to
15 review the Grenfell Tower Project with Gareth and
16 myself. As discussed please find attached all necessary
17 details for CEP Architectural to produce a design,
18 manufacture and supply price along with installation
19 costs from your approved installer Highrise Solutions."

20 Then in the fourth paragraph down he says:

21 "... as mentioned [to] aid our report next week an
22 initial budget figure would be very handy early next
23 week with a further more detailed quote to follow."

24 You can see there that the subject matter of his
25 request is the design, manufacture and supply. You see

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1 that in the first paragraph.

2 A. Yes.

3 Q. Was that a request for a full-blown CEP system, so
4 supplying design services as well as all components of
5 the façade and the windows?

6 A. I believe so, yes.

7 Q. Right.

8 Now, with that email, as we can see from the
9 attachment, Mr Kotecha supplied a specification. That
10 is at {CEP00048887}, if we can look at that, please.
11 There it is.

12 Do you remember seeing this?

13 A. Yes.

14 Q. That's the first page of it.

15 I would like to go to page 6 {CEP00048887/6},
16 please, and look with you at the middle column on
17 page 6. If we could just blow that up a little bit, you
18 can see there that there is a heading "External
19 Envelope", under the bigger heading "Existing
20 residential flats (Level 01-20)". Do you see that?

21 A. Yes.

22 Q. Under "External Envelope", we can see a variety of
23 things, and the third entry down is:

24 "H92. Rainscreen Cladding.

25 "Existing Columns over-cladding."

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1 Then a bullet point:
 2 "VMZ Composite Zinc panels."
 3 Do you see that?
 4 A. I do, yes.
 5 Q. Below that there is another H92 entry, just two below
 6 that:
 7 "H92 Rainscreen Cladding.
 8 "External wall.
 9 "12mm HPL cladding (Trespa or similar) and sub-frame
 10 system (surface fix, cappings to match panel colour)."
 11 Now, did you understand the VMZ composite zinc
 12 panels reference in the first of those H92 references to
 13 be a reference to zinc panels with a core?
 14 A. I probably would have done at the time, yes.
 15 Q. That would be an FR core, would it?
 16 A. I don't know.
 17 Q. I think it would be. If Deborah French is correct, that
 18 would be an FR core.
 19 Did you understand the reference to Trespa in the
 20 second H92 reference there to be to a high-pressure
 21 laminate or HPL composite?
 22 A. Yes.
 23 Q. Now, you I think respond to that quotation by email on
 24 31 January 2013, and let's look at that. It's
 25 {CEP000000138}. I would like to look at the first page

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1 of that, second email down, email from you, 31 January,
 2 to Mohit Kotecha, subject: "Grenfell Tower External
 3 Envelope Enquiry":
 4 "Morning Mo, Gareth,
 5 "Please see the below costings ref the above.
 6 "Rainscreen overcladding, Reynobond Zinc Patina
 7 paint finish, which allows for under window areas,
 8 columns & crown ..."
 9 Then you give a figure of £629,000-odd:
 10 "Installation of [rainscreen] £183,500-00."
 11 Then you give a quote for windows and curtain wall
 12 and then some exclusions.
 13 If we just turn the page {CEP000000138/2} to see how
 14 this finishes, just for completeness:
 15 "I'll provide a fully typed quotation letter Monday
 16 to firm up the above.
 17 "Trust the above meets with your approval, please
 18 ring me if you've any questions."
 19 Now, you're specifying there Reynobond zinc patina
 20 paint finish. If we go back to the first page
 21 {CEP000000138/1} and focus on those words, you will see,
 22 "Reynobond Zinc Patina paint finish".
 23 Was that for Reynobond ACM with a zinc patina paint
 24 finish?
 25 A. I believe so, yes.

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1 Q. Right.
 2 Now, skip forward to the formal quote that you
 3 promise and indeed sent a few days later. This is at
 4 {CEP0000000148}, I think we saw this earlier on.
 5 A. Yes.
 6 Q. 2 February. You can see there in the second
 7 paragraph -- it's the paragraph I read to you earlier
 8 this morning:
 9 "... Reynobond 'Zinc Patina paint finished' ACM
 10 (aluminium composite material)."
 11 So that's how the quotation ended up.
 12 Those quotes, as we can see, and you say, are for
 13 a Reynobond ACM panel, aren't they?
 14 A. Correct.
 15 Q. Can you tell us why you didn't provide a quotation that
 16 you were asked for in the Leadbitter specification for
 17 ZCM?
 18 A. No.
 19 Q. Or --
 20 A. I don't recall why this -- it says it's a zinc patina.
 21 I don't recall the reason behind that, if there was one,
 22 or there must have been one, but I don't recall why that
 23 was the case.
 24 Q. You see, the specification I showed you that Mohit had
 25 sent you didn't ask for an ACM product at all, so the

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1 question is: why were you quoting for one?
 2 A. I don't recall.
 3 Q. And it didn't ask for a Reynobond or Arconic product at
 4 all, did it? So, again, why were you quoting for one?
 5 A. I don't recall why that's gone out like that or what the
 6 reason behind it was.
 7 Q. Right.
 8 If we go to your second witness statement, please,
 9 {CEP00064247/13}, I just want to look at paragraph 62 in
 10 the light of what we have just been looking at, because
 11 in paragraph 62 you're asked the question, under the
 12 heading "Do you agree that you put Reynobond forward?"
 13 Answer:
 14 "No, I did not put Reynobond forward. I understand
 15 that Reynobond was one of the alternatives named in the
 16 specification ..."
 17 Now, the specification I think you're referring to
 18 there is the NBS specification done as part of the
 19 tender process later in 2013 and not the specification
 20 sent to you by Leadbitter in early 2013, but it's not
 21 correct, is it, to say that you didn't put Reynobond
 22 forward? We can see the quotation you have sent
 23 originally to Leadbitter, and you did put Reynobond
 24 forward when you hadn't been asked for it. That's
 25 right, isn't it?

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1 A. Yes, it would have been on that basis.
 2 Q. Yes.
 3 Now, in February 2013, when you put that quotation
 4 forward to Mohit Kotecha at Leadbitter, you knew that
 5 you were quoting for a high-rise building, in other
 6 words over 18 metres in height.
 7 A. Correct.
 8 Q. And you were doing so in circumstances where you were
 9 proposing a different product from the one that
 10 Mr Kotecha had asked for; yes?
 11 A. Correct.
 12 Q. Did you investigate at that time -- so late January,
 13 early February 2013 -- when responding to the request
 14 for a quotation from Mr Kotecha, whether the Reynobond
 15 ACM panels that you were quoting for were suitable for
 16 a building over 18 metres?
 17 A. I didn't, no.
 18 Q. Why is that?
 19 A. I don't recall.
 20 Q. Did you ask anybody at Arconic whether it was suitable
 21 for a building over 18 metres?
 22 A. Not that I'm aware of, no.
 23 Q. Did you check at all whether it was a suitable product
 24 to be used at that height?
 25 A. I personally didn't, on the basis that Reynobond/Arconic

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1 had been at the meetings, I -- you know, I never
 2 considered that question.
 3 Q. You never considered that question. Right.
 4 I want to explore with you a little bit of what you
 5 understood Deborah French knew about Grenfell being
 6 a tall building.
 7 Can we go to {CEP00048975}, please. This is
 8 an email of 24 January 2013 to Neil Wilson at CEP and
 9 also to Deborah French, and you're sending on to them
 10 the enquiry made by Mohit Kotecha of 24 January that we
 11 saw a few minutes ago in your evidence together. Do you
 12 see that?
 13 A. Correct, yes.
 14 Q. Now, there's no message in your email in which you
 15 forward Mohit Kotecha's email to Debbie French or
 16 Neil Wilson. Why is that?
 17 A. I was just forwarding on the information. I didn't
 18 believe there was any other message to add to it, I was
 19 just sending that information over to Neil Wilson and
 20 Debbie French.
 21 Q. Was Debbie French expecting the request for a quotation,
 22 specification and drawings at the time?
 23 A. I'm not sure whether she was expecting that.
 24 Q. Right.
 25 Did you have a conversation with Debbie French about

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1 this project and the possibility of a design,
 2 manufacture and supply at this time with Debbie French?
 3 A. Not that I recall, but she had been at the meeting when
 4 Leadbitters were there in October.
 5 Q. What did you think she was expecting to do with the
 6 information when you sent it to her?
 7 A. Erm ... review it, in some depth.
 8 Q. Review it in some depth?
 9 A. And pass any information on that we may need.
 10 Q. Right.
 11 To your knowledge, was Debbie French aware from this
 12 email and the attachments, if not before, that the
 13 building, Grenfell Tower, was over 18 metres in height?
 14 A. I would expect so.
 15 Q. And is that because -- and we can go to them if need
 16 be -- the attachments included the specification and
 17 drawings of the building which make it clear that it is
 18 a building over 18 metres in height?
 19 A. Correct.
 20 Q. Given that -- and obviously we need to explore this with
 21 her, to be fair to her -- on the face of it she was
 22 being given information that would lead her to know that
 23 Grenfell Tower was a building over 18 metres in height,
 24 would you expect her only to provide prices for
 25 materials or products which were suitable for buildings

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1 of those dimensions?
 2 A. Yes.
 3 Q. Can we then move on to February 2013. We are at the
 4 beginning of it. If we go to your second witness
 5 statement at paragraph 48, please, page 10
 6 {CEP00064247/10}, you say:
 7 "I understand that Arconic and Deborah French were
 8 fully aware of the building size, given that they had
 9 received the relevant documents."
 10 Is that a reference to the email of 24 January 2013
 11 and the attachments that we've just seen?
 12 A. I believe it would have been.
 13 Q. Right.
 14 Let's move on in time a little bit in February 2013,
 15 {CEP000000150}, please. This is an email from you to
 16 Deborah French of 27 February 2013. "Grenfell Tower
 17 London" is the subject:
 18 "Morning Debbie,
 19 "Ref the above project, I've a meeting with the
 20 architects Studio E on Monday 4th Mar regarding the
 21 rainscreen overcladding. They've advised me that due to
 22 the cost of Zinc rainscreen they are now considering
 23 alternative material and finishes to that of zinc.
 24 We'll propose your full Reynobond range and finishes as
 25 alternative options."

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1 Now, it's clear from that that you were planning at
 2 least at that stage to go to a meeting with Studio E on
 3 4 March, as we can see. Did you actually go?
 4 A. I believe I did, yes, correct.
 5 Q. It looks as if Deborah French was not invited to that
 6 meeting. Is that right?
 7 A. Correct.
 8 Q. You say in the last sentence:
 9 "We'll propose your full Reynobond range and
 10 finishes as alternative options."
 11 By "we", do you mean CEP?
 12 A. Yes.
 13 Q. So did you mean by this email that you were going to be
 14 promoting the full Reynobond range and finishes to
 15 Studio E essentially on behalf of Deborah French?
 16 A. Yes.
 17 Q. Had anybody asked you at that stage to put Reynobond
 18 forward?
 19 A. No.
 20 Q. So you were doing this voluntarily, effectively?
 21 A. On behalf of CEP?
 22 Q. Well, doing Debbie French --
 23 A. Yes.
 24 Q. For Debbie French?
 25 A. Yes.

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1 Q. Yes.
 2 A. Go on. I'll let you continue.
 3 Q. Well, did you consider putting forward cladding from any
 4 other manufacturer or providing any alternative options
 5 to Studio E, for example Alucobond?
 6 A. No.
 7 Q. Why is that?
 8 A. We'd already introduced Reynobond to the project. We
 9 dealt with both Alucobond and Reynobond as the two
 10 principal ACM companies. We dealt with them both on
 11 an even basis, and it was courteous in our mind that we
 12 stayed with the one we'd introduced rather than bring
 13 another competitor in.
 14 Q. Why had you introduced Debbie French from Arconic to
 15 start with?
 16 A. Initially because I believe they had the zinc product
 17 that Studio E was looking for.
 18 Q. Did Alucobond not have that?
 19 A. I'm not aware whether they did or they didn't.
 20 Q. Did you investigate?
 21 A. No.
 22 Q. Why is that?
 23 A. Initially I was aware that Reynobond had one and went
 24 with that decision.
 25 Q. Right. But if you had been even-handed or equal between

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1 them, you would have wanted to --
 2 A. I believe we didn't have an account with Alucobond at
 3 that time.
 4 Q. Right. So did that play into the decision as to whether
 5 to be --
 6 A. Possibly.
 7 Q. Right. I see.
 8 Now, if we go to your second witness statement at
 9 page 6 {CEP00064247/6}, please, I just want to show you
 10 something you say at paragraph 31. You say under the
 11 heading "Use of Reynobond 55 on Grenfell Tower":
 12 "I did not discuss or agree with Arconic, Harley or
 13 any other party that I or CEP would recommend
 14 Reynobond 55 cladding for use on Grenfell Tower."
 15 In the light of the emails we have just been looking
 16 at, Mr Blades, that's not correct, is it?
 17 A. I didn't recommend Reynobond. I wouldn't say
 18 I recommended it; I introduced it.
 19 Q. Well, you were putting it forward.
 20 A. Putting it forward, yeah. But I wouldn't say
 21 categorically, "They recommend that you should use
 22 that".
 23 Q. Right. So we would draw a distinction, would we, when
 24 reading that, between recommending and suggesting?
 25 A. Yes.

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1 Q. What is the distinction, can you help me?
 2 A. If it was recommending, I think I would be endorsing it
 3 to use that solely and no other product that I was aware
 4 of.
 5 Q. But --
 6 A. -- recommend a recommendation.
 7 Q. No, but by putting forward or promising that you would
 8 propose a full Reynobond, as you told Debbie French you
 9 would, were you not recommending Reynobond 55 cladding
 10 for use on Grenfell Tower?
 11 A. No, I don't believe I was recommending that solely.
 12 I was showing Studio E or introducing Studio E to other
 13 finishes that may be suitable in light that the zinc
 14 option had -- you know, it wasn't meeting their cost
 15 parameters or their client's cost parameters.
 16 Q. But you do agree that you agreed or discussed with
 17 Arconic that you would propose Reynobond 55 cladding for
 18 use on Grenfell Tower? We've just seen that in the
 19 email.
 20 A. Yes.
 21 Q. Right. By proposing something, I have to suggest to you
 22 that that's the same as a recommendation.
 23 A. Okay. That's --
 24 Q. Right.
 25 A. That's not how I would recommend it.

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1 Q. All right.
 2 Let's look at March 2013. The story continues. You
 3 meet with Mr Sounes and Mr Jess of Studio E on 4 March.
 4 Do you remember that meeting?
 5 A. On 4 March?
 6 Q. Yes.
 7 A. Yes.
 8 Q. Let's go to {ART00000919}, please. This is an email
 9 chain between Alun Dawson of Artelia and Bruce Sounes,
 10 copied to David Hale, on 4 March 2013. David Hale was
 11 at Appleyards. The attachments are "Grenfell Tower
 12 Regeneration Project - BREEAM Value Engineering".
 13 If you go to the second email down on that page, at
 14 the very bottom of the page, you can see there is
 15 an email there which continues on to page 2. I just
 16 want to show you the fourth bullet point on that page
 17 {ART00000919/2}. It says there:
 18 "We have had CEP come in today to discuss the
 19 cheaper ACM cladding option and they will be forwarding
 20 samples for possible presentation to Planning. From our
 21 conversation with CEP we feel there might be scope to
 22 switch from zinc but it will require a bit more
 23 elaboration than the Leadbitter's figure allows. We
 24 note that Leadbitter don't appear to have costed the
 25 zinc and have put in a budget figure only."

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1 Was it you who attended that meeting with Studio E
 2 on 4 March?
 3 A. Yes.
 4 Q. And at that meeting, did you have discussions with
 5 Mr Sounes about using Reynobond ACM?
 6 A. Yes.
 7 Q. And did you do so as a cheaper option, cheaper than the
 8 zinc that they were after?
 9 A. I wouldn't put it forward as a cheaper option. It was
 10 apparent from the conversation or the telephone call
 11 where Studio E requested me to go back down, they'd
 12 suggested that zinc was too expensive for the client, or
 13 too -- it was too expensive on cost or whatever the
 14 reason was. So I went into it, you know, to put forward
 15 other options that I considered were probably less
 16 expensive than zinc on that basis.
 17 Q. Right.
 18 A. But I don't know how much the zinc was. I mean to say
 19 we'd never quoted -- you know, never looked at zinc as a
 20 cost.
 21 Q. Right.
 22 Was it your general experience that clients tended
 23 to choose ACM because of budgetary constraints?
 24 A. No.
 25 Q. No?

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1 Can we go to Mr Sounes' witness statement.
 2 Actually, before I show you that, can I just ask
 3 you: at this meeting, where it says, according to
 4 Mr Sounes' note, that you had come in today and
 5 discussed the cheaper cladding option, and they'll be
 6 forwarding samples, can you tell me: what do you recall
 7 was Mr Sounes' reaction to the idea of changing zinc and
 8 using ACM instead?
 9 A. Sorry, can you just repeat that?
 10 Q. Yes. What was Mr Sounes' reaction to the idea of
 11 changing from zinc to ACM?
 12 A. I don't think -- I don't recall, but I don't believe he
 13 had any objections to it.
 14 Q. Right, okay.
 15 Can we go to his statement, {SEA00014273/88},
 16 please, paragraph 207.
 17 Now, he says four lines down from the start of that
 18 paragraph:
 19 "In preparing this witness statement I am reminded
 20 that Harley in fact later said that in its experience
 21 clients tend to adopt the cheapest cladding option due
 22 to budget constraints and I believe that Geof Blades
 23 (CEP) also indicated something similar to me at some
 24 point."
 25 Do you recall making a comment to Mr Sounes that

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1 clients tend to adopt the cheapest cladding option
 2 because of budget constraints?
 3 A. No.
 4 Q. You don't?
 5 A. No.
 6 Q. You don't.
 7 At the time -- and this is March, early
 8 March 2013 -- did you think that there were reasons to
 9 choose ACM other than budgetary constraints?
 10 A. Yes.
 11 Q. What were those?
 12 A. The ACM has a paint finish in whatever format, PDF or
 13 however it is, so the client and the design team can
 14 choose any particular colour they want, and they can
 15 match -- in this instance they could match the panels to
 16 the aluminium windows if they so chose, and that's one
 17 of the advantages of a paint finish product.
 18 Q. Was that discussed at the 4 March meeting, do you
 19 remember?
 20 A. I don't remember.
 21 Q. Flexibility in terms of choice of --
 22 A. Possibly, possibly.
 23 Q. You say possibly ...
 24 A. I don't recall what was said at that meeting in -- no,
 25 I don't recall what was said.

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1 Q. You don't recall what was said?
 2 A. To that extent. I mean, it was a discussion about
 3 options other than zinc --
 4 Q. Right.
 5 A. -- in that case.
 6 Q. We can see from the bullet point in the email I've just
 7 shown you that certainly budgets were discussed and
 8 optionality, if you will forgive the word, about
 9 finishes was not. Is that a fair summary?
 10 A. I don't recall discussing budgets --
 11 Q. Right.
 12 A. -- with Studio E.
 13 Q. Right.
 14 Can we go to {CEP000000151}. This is an email from
 15 you to Deborah French on 5 March, a day after your
 16 4 March meeting with Mr Sounes, and you are reporting to
 17 her the meeting that you had had the previous day with
 18 Mr Sounes and indeed Adrian Jess of Studio E.
 19 You start by saying:
 20 "Hi Debbie,
 21 "Positive meeting yesterday with Adrian Jess and
 22 Bruce Sounes of Studio E."
 23 What do you mean by that, by positive?
 24 A. It probably went very well, it was positive, there
 25 was -- whatever -- however you read positive to mean, it

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1 was a positive meeting.
 2 Q. Positive from whose point of view?
 3 A. Certainly from my point of view that they were happy
 4 with what I discussed.
 5 Q. Positive also from Debbie French's point of view? Yes?
 6 A. Yeah, you would have to ask Debbie French whether that
 7 was the case, but I was happy with the meeting.
 8 Q. Were you not telling her that it was a positive meeting
 9 because you had made some headway with Mr Sounes in the
 10 possible selection of Reynobond products?
 11 A. Yes. Yes.
 12 Q. We can see from the email a bit lower down that you were
 13 asking her for the provision of information about:
 14 "... 'Sika' bonding of Reynobond as concealed fix is
 15 being considered for the lower area of rainscreen."
 16 And then you ask for a series of samples: zinc
 17 patina, stainless look, copper patina and gold look.
 18 A. Correct.
 19 Q. All those samples, I think -- is this right? -- were
 20 ACM, weren't they?
 21 A. They would have been, yes.
 22 Q. With a PE core?
 23 A. I believe they would have been.
 24 Q. Yes.
 25 Can we go to {CEP000000152}. This is

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1 Deborah French's response to you, in response to this
 2 email, of 8 March. Do you see that? And she attaches
 3 some pictures of a project she has done in Cambridge
 4 with zinc. She starts by saying:
 5 "Hi Geof
 6 "Good to hear the meeting went well."
 7 So she was pleased about the meeting.
 8 Did you send the pictures that she was sending you
 9 on to Studio E, do you remember?
 10 A. The one that's at the bottom of the screen?
 11 Q. No, the attachments. If you want, we can look at one.
 12 Well, let's try. {CEP000000154}, please. This is one
 13 of the pictures that she was attaching to you of the
 14 project in Cambridge. Does that look familiar to you?
 15 A. I don't recall it, but obviously it's an email to me, so
 16 I would have seen it at the time.
 17 Q. Right. Do you remember whether you sent this picture
 18 and others like it on to Studio E that you had received
 19 from Debbie French?
 20 A. I don't recall it, no.
 21 Q. Is it right that from this point on, say early
 22 March 2013, you didn't provide samples or pictures of
 23 projects to Studio E from any manufacturer other than
 24 Arconic?
 25 A. Yes, and I'm not sure I provided those pictures either.

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1 Q. Right.
 2 Did Studio E ask only for Arconic samples or did
 3 they leave that up to you?
 4 A. They only asked me for Arconic samples.
 5 Q. Right.
 6 Can we then go to your unsolicited statement,
 7 {CEP000008838/11}, paragraph 7.42. You say there:
 8 "The purpose of the meeting 4th March 2013 was to
 9 discuss and consider alternative finishes as zinc was
 10 now being discounted due to cost issues. It was
 11 considered a matter of courtesy to continue with Arconic
 12 as it had already been introduced to this project."
 13 Surely, Mr Blades, if another manufacturer had
 14 offered a better price, you would have pursued it?
 15 A. Sorry, can you just repeat that question?
 16 Q. Yes. If another manufacturer of suitable panels, let me
 17 put it that way, was offering a better price in
 18 comparison with Reynobond, you would have pursued it.
 19 A. I wouldn't have chosen another company just purely on
 20 price.
 21 Q. What else would you choose it on?
 22 A. In this instance, if another company had a more suitable
 23 product, more in line with what Studio E were
 24 considering, then I may have considered an alternative
 25 panel. But I wouldn't go out -- I wouldn't look at

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1 somebody that's prices were cheaper or more competitive
 2 than Arconic's just to change the product.
 3 Q. When you say it was considered a matter of courtesy to
 4 continue with Arconic as it had already been introduced
 5 to this project, is what you really mean here not
 6 courtesy but loyalty to your existing relationship with
 7 Arconic?
 8 A. Loyalty to them and courtesy to them, because I wouldn't
 9 do the same if I'd introduced Alucobond to the project.
 10 I wouldn't then turn round and introduce another ACM
 11 company to the project.
 12 Q. Right.
 13 A. We only had two suppliers of ACM.
 14 Q. I see.
 15 A. And if we upset one, we're down to down, and we've
 16 lost --
 17 Q. I see.
 18 A. -- 50% of our options.
 19 Q. I understand.
 20 So would you accept, then, that looking at the
 21 emails of February and March that we have, you were
 22 actually trying to get Reynobond PE ACM panels on to
 23 Grenfell Tower?
 24 A. Reynobond panels, yes.
 25 Q. Right. Well, you say "Reynobond panels, yes"; I asked

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1 you Reynobond PE ACM panels.
 2 A. Yes, but the core was never discussed at that point.
 3 Q. I see.
 4 A. It wasn't a point of sale or a point of price. To CEP
 5 at the time, the PE core was all inclusive with the
 6 Reynobond panel.
 7 Q. I follow.
 8 A. There was no distinction between one or the other.
 9 Q. All right. But Reynobond panels, yes, you say that?
 10 A. Reynobond panels, yes.
 11 Q. Can we look at your second witness statement, please,
 12 {CEP00064247/6}, and look at paragraph 32. You say --
 13 and again, it's under the same heading we looked at
 14 earlier. We looked at 31, I want to look at 32:
 15 "Further and in addition, neither I nor CEP
 16 recommended Reynobond 55 cladding for use on
 17 Grenfell Tower. I introduced Deborah French of Arconic
 18 to Studio E as being the representative of Arconic who
 19 could demonstrate their products, however I had no
 20 involvement in the discussions."
 21 In the light of the emails we have been looking at,
 22 Mr Blades, do you still say that you had no involvement
 23 in the discussions about the cladding on Grenfell Tower?
 24 A. I wouldn't have been involved in the immediate
 25 discussions or the direct discussions with the

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1 Reynobond/Arconic panels, that was down to Arconic,
 2 Deborah French. It was her -- they were her products to
 3 discuss in better knowledge than mine.
 4 So I was at the meetings, I would have discussed the
 5 CEP rainscreen system and how a Reynobond panel may or
 6 may not work with it, but in terms of the Reynobond
 7 itself, it wasn't my field of knowledge to discuss it in
 8 any great depth as such.
 9 Q. But you were involved, I think, in the discussions
 10 between you, Debbie French and Studio E about the choice
 11 of cladding on Grenfell Tower?
 12 A. I was at the meeting -- I was in discussions with them,
 13 yes.
 14 Q. And indeed you had facilitated or helped to facilitate
 15 the choice of Reynobond panels on Grenfell Tower.
 16 A. Within CEP, yes. The choice of the final panels were
 17 down to the architect and the client, et cetera. I'd
 18 introduced them to them with what I thought was
 19 a suitable panel product for that project at that time.
 20 Q. So we need to read paragraph 32 in the light of what you
 21 now say?
 22 A. Okay.
 23 Q. Yes.
 24 I would like to turn to an email a little bit later
 25 in 2013, Mr Blades. Can we go to {CEP00049719}. This

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1 is an email of 13 May 2013 from Deborah French to
 2 Neil Wilson, you and Roy Fewster at CEP.
 3 A. Yes.
 4 Q. I would like to take a little bit of time on this email,
 5 so let's read it all.
 6 The subject is a BBC report being forwarded, and it
 7 refers to "ACM in UAE", and there is a picture. It
 8 says:
 9 "Hi
 10 "As you may be aware there had been some reports via
 11 BBC concerning a fire on a building in UAE regarding
 12 ACM.
 13 "As a business we are aware of this report and our
 14 technical team are following the details, but in the
 15 meantime I wanted to add some thoughts that may help if
 16 you get questions from your customers/clients etc.
 17 "Regarding the supply of Reynobond in the UK, as you
 18 know we supply both PE and FR core and can control and
 19 understand what core is being used in all projects due
 20 to the controlled supply route we have. By only
 21 supplying Reynobond to a very small group of Approved
 22 Fabricators and working very closely with them on all
 23 projects we are able to follow what type of project is
 24 being designed/developed and then offer the right
 25 Reynobond specification including the core.

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1 "At this stage we will continue to offer both PE &
2 FR core and continue the close working relationship we
3 have with our Approved Fabricators to make sure the
4 right technical support, Reynobond Specification and
5 Materials are being used and installed on Reynobond
6 Projects.

7 "Many thanks for making me aware of the reports and
8 for your continued support."

9 Do you remember receiving that email?

10 A. I do now, yes.

11 Q. Now, it looks from the last sentence that it was CEP who
12 had brought the UAE fire to Deborah French's attention.

13 Is that right?

14 A. I don't recall that.

15 Q. Right. Now, it's possible, to be fair to you, that this
16 email was a round-robin email to other fabricators. She
17 was telling all of her fabricators the same thing. But
18 from your recollection, do you remember whether it was
19 CEP or somebody else who had become aware of the fire in
20 the UAE and had brought it to her attention?

21 A. I believe it was somebody else. It certainly wasn't
22 myself, and I don't recall anybody else at CEP --
23 I didn't certainly send anything to Deborah French.

24 Q. Right.

25 Do you recall the fire in the UAE which she's

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1 talking about?

2 A. Only now. I'm aware of these documents now. I wasn't
3 aware of it at the time, other than through these
4 documents.

5 Q. Right. So do we take it from that that you didn't see
6 or hear the reports through the BBC of the fire in
7 a building in the UAE --

8 A. No, I may have seen --

9 Q. -- involving ACM?

10 A. I may have seen it after I'd seen this. I don't recall.

11 Q. Was this email, therefore, the first that you learned
12 about that fire?

13 A. I believe it wasn't.

14 Q. You believe it wasn't?

15 A. I think we got one off Alucobond a couple of days
16 before.

17 Q. What, a similar message?

18 A. Same sort of email, yes.

19 Q. Right.

20 A. Or a similar type of email. They'd seen it on the BBC
21 a couple of days before and we got one from Alucobond.

22 Q. I see. Who was your contact from Alucobond who you got
23 that email from?

24 A. At that time it was Richard Geater.

25 Q. Richard Geater.

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1 Did you understand from this email -- and let's work
2 with this one -- that the fire was thought to have
3 involved ACM with a PE core?

4 A. I believed it was an ACM. What the core was, I wasn't
5 aware of.

6 Q. Right.

7 Did you know about any other cladding fires
8 involving ACM or ACM with a PE core particularly?

9 A. Other than the one we've mentioned at Grenfell -- sorry,
10 at Camden.

11 Q. Right.

12 Did you understand from this that ACM with a PE core
13 was combustible?

14 A. If the one that was used in this project was a PE core,
15 then yes, I would have been.

16 Q. Right.

17 Following this email, Mr Blades, did you consider
18 that ACM with a PE core might be a dangerous product for
19 use on a high-rise building because of its combustible
20 properties?

21 A. Not if it had been installed with the correct
22 fire barriers and fire strategies that are required with
23 the cladding system.

24 Q. Was that your thought at the time?

25 A. Possibly, yes. I don't recall what my thought at the

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1 time was.

2 Q. What did you do in response to this email?

3 A. With regards to ...?

4 Q. Well, what did you do internally at CEP in response to
5 this email?

6 A. We may have had a quick conversation about it, I don't
7 recall.

8 Q. Did you start looking more carefully at whether FR-cored
9 ACM should be specified on particular projects,
10 particularly high-rise projects, in place of PE?

11 A. I don't recall if we did or not, no.

12 Q. Is there any reason why you didn't start to look more
13 carefully at whether PE was safe to use on high-rise
14 buildings?

15 A. I'm not aware of a reason why we didn't or did look at
16 it any further.

17 Q. You say, "We may have had a quick conversation about
18 it".

19 A. An email came in to three people, so, you know, there
20 could have been a few comments about it.

21 Q. Was this not a major alarm bell for CEP, as a fabricator
22 of ACM panels?

23 A. It could have been, yes.

24 Q. Well, you say it could have been. I can suggest to you
25 it certainly should have been, but the question I have

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1 is : was it?
 2 A. It wasn't me personally, no.
 3 Q. Well, you're personally a recipient of this email. What
 4 I'm really keen to get to the bottom of is why you
 5 didn't react more strongly to this message and start
 6 thinking hard about whether the use of ACM PE-cored
 7 panels were safe on buildings above 18 metres in the UK?
 8 A. We would have relied on designers, possibly, to ensure
 9 that that product or the products that were being chosen
 10 were compliant.
 11 Q. Did this email cause you to look or look again, perhaps,
 12 at the BBA certificate for Reynobond ACM panels?
 13 A. I'm not aware it did, no.
 14 Q. Or to question it?
 15 A. No.
 16 Q. Did you think to question it?
 17 A. I don't recall doing that, no.
 18 Q. Did any other clients or the market or other fabricators
 19 in the same position as you express any views to you
 20 about the fire risks inherent in using PE as opposed to
 21 FR core?
 22 A. Not that I'm aware of.
 23 Q. Was there any market discussion beyond this email that
 24 you were aware of at the time --
 25 A. No.

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1 Q. -- or involved in?
 2 A. I wasn't aware of any market discussions about it.
 3 MR MILLETT: Mr Chairman, we're approaching 1 o'clock, and
 4 mid-line.
 5 SIR MARTIN MOORE-BICK: Yes.
 6 MR MILLETT: I'm going to turn to a very slightly different
 7 aspect of the same document. It may be an appropriate
 8 moment to break.
 9 SIR MARTIN MOORE-BICK: Well, if it's not inconvenient to
 10 you, I suggest that it probably is a good idea, because
 11 these things have a habit of going on longer than you
 12 initially expect.
 13 MR MILLETT: Yes. This line is probably another 10 minutes,
 14 so I will eat into the break.
 15 SIR MARTIN MOORE-BICK: Well, then, let's have a break now.
 16 Mr Blades, we're going to have a break now so we can
 17 all get some lunch.
 18 THE WITNESS: Okay.
 19 SIR MARTIN MOORE-BICK: We will resume at 2 o'clock, please,
 20 and remember not to talk to anyone about your evidence
 21 or anything to do with it while you're out of the room.
 22 All right?
 23 THE WITNESS: Thank you.
 24 SIR MARTIN MOORE-BICK: Thank you very much. Would you go
 25 with the usher, please.

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1 (Pause)
 2 All right, 2 o'clock then, please.
 3 (1.00 pm)
 4
 5 (The short adjournment)
 6 (2.00 pm)
 7 SIR MARTIN MOORE-BICK: Right, Mr Blades, ready to carry on?
 8 THE WITNESS: Yes, thank you.
 9 SIR MARTIN MOORE-BICK: Thank you very much.
 10 Yes, Mr Millett.
 11 MR MILLETT: Mr Blades, before the break we were looking at
 12 the email which had come from Deborah French at
 13 {CEP00049719}. Can we go back to that, please. In the
 14 third paragraph she says, and we have read it:
 15 "Regarding the supply of Reynobond in the UK, as you
 16 know we supply both PE and FR core ..."
 17 Pausing there, it's quite clear from that point
 18 onwards that you were very clearly aware that Reynobond
 19 supplied ACM panels with both a PE and an FR core. That
 20 must be right, mustn't it?
 21 A. Yes.
 22 Q. If you then look down at the third line down in that
 23 paragraph, Ms French refers to supplying Reynobond only
 24 to a very small group of approved fabricators. Do you
 25 know what she meant by approved fabricators?

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1 A. I'm taking that to mean companies like CEP, and I think
 2 we -- there was something earlier where there was a few
 3 other company names mentioned, I think Sotech was one
 4 and a couple of others mentioned, they had what they
 5 classed as a small group of fabricators who didn't --
 6 who weren't installers, I think that's how they viewed
 7 it.
 8 Q. She refers to approved fabricators; what did you have to
 9 do, do you think, to be approved, as she calls it?
 10 A. I believe one of the criteria was you didn't install or
 11 you weren't the sole -- or you weren't the end user of
 12 it.
 13 Q. As at May 2013, the date of this email, how many
 14 projects do you think you had worked on with
 15 Deborah French?
 16 A. End of which year, sorry?
 17 Q. As at the date of this email, which is May 2013, how
 18 many projects do you think up to that date you had
 19 worked on with Deborah French or using her products?
 20 A. Not many. The one I do recall was Camden.
 21 Q. Yes. Right.
 22 She says, in the third line, she always works with:
 23 "... a very small group of Approved Fabricators and
 24 working very closely with them on all projects we are
 25 able to follow what type of project is being designed

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1 ... and then offer the right ... specification including
2 the core."

3 Would you say that Arconic, from your experience of
4 them prior to this email, always understands what core
5 is being used in projects?

6 A. Yes.

7 Q. And is it right that Arconic controls what core is used
8 in ACM cladding in all projects, as she says? Is that
9 right?

10 A. I'm not sure. I can't say that they control all cores,
11 I don't know --

12 Q. But from your experience of her to that point, when she
13 says there is a controlled supply route?

14 A. On what she's saying there, I would agree that Arconic
15 would have a full understanding of the projects that
16 their fabricators are working on.

17 Q. She says in the first line of that paragraph that they
18 can control and understand what core is being used in
19 all projects, and I'm just keen to know whether, where
20 she says Arconic controls what core is being used, that
21 was consistent with your experience of Reynobond, and
22 Debbie French in particular?

23 A. I wasn't aware -- I don't think CEP were aware that they
24 actually controlled what core was used. From our point
25 of view, we would ask -- request information or prices

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1 or samples for Reynobond. We would never -- CEP never
2 requested a particular core. So in terms of whether
3 they controlled it from their side, I can't answer that.

4 Q. Right.

5 She says later on in that paragraph, as I've read to
6 you, that Arconic always made sure they offered the
7 right Reynobond specification, including the core; was
8 that your experience? In other words, when they were
9 putting forward a Reynobond specification, they would
10 take into account the appropriateness of the core for
11 the project?

12 A. I would have believed so.

13 Q. Right.

14 Where she says in the last-but-one line:

15 "... we are able to follow what type of project is
16 being designed/developed and then offer the right
17 Reynobond specification including the core."

18 On what kinds of buildings would PE continue to be
19 offered as opposed to FR, do you know?

20 A. I don't, no.

21 Q. Did you get the impression from this email that she was
22 saying that Reynobond, that is Arconic, would match the
23 appropriate core of an ACM panel to the particular
24 building the subject of the project in hand?

25 A. I would agree so. I think that's the intimation of

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1 this, yes.

2 Q. That's how you understood it at the time?

3 A. That would agree with this, yes.

4 Q. Yes.

5 Did you think how the type of project was likely to
6 affect what core was offered?

7 Let me put that in a slightly different way: what
8 went through your mind as to what the right project for
9 a PE core was and the right project for an FR core was?

10 A. We, CEP, never distinguished or made reference to the
11 core with particular projects, certainly prior to
12 Grenfell fire.

13 Q. Right.

14 A. We would request an ACM information -- in this instance,
15 you know, we would ask information about Reynobond as
16 a sample or a price with no reference to a core.

17 Q. Right. But when you say, "We, CEP, never distinguished
18 or made reference to the core", does that tell us that,
19 in your experience of Reynobond until this point, you
20 had never had a discussion with Debbie French about
21 which kind of core, PE or FR, fitted which kind of
22 project?

23 A. That's correct.

24 Q. I see.

25 Did it surprise you when she said that Arconic was

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1 able to follow what type of project was being designed
2 and developed and then offer the right Reynobond
3 specification, including the core? Did that surprise
4 you at the time, given that it hadn't been your
5 experience of them?

6 A. I would like to say probably not at the time, but it
7 does now.

8 Q. Does that mean that you didn't read it carefully at the
9 time sufficiently for it to surprise you?

10 A. Probably, yeah, I'd go with that.

11 Q. Okay.

12 Now, by right specification, given the context of
13 this email, which is a cladding fire in the UAE
14 involving ACM, what did you understand her to mean by
15 "the right Reynobond specification" in that last line?

16 A. I would refer -- I would believe that Debbie French
17 would be referring to the specification that was used on
18 the building in the UAE, in terms of whatever material
19 was specified there.

20 Q. Yes. In other words, safe in relation to the fire risks
21 posed by the building?

22 A. Yes.

23 Q. Was it your experience with Alcoa and Reynobond in
24 particular that they worked closely with CEP to know
25 what you were making and for what project?

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1 A. Yes.
 2 Q. And that included Grenfell Tower?
 3 A. Yes, they was aware of the projects that we worked on.
 4 Q. Does that mean that she knew, once cassette had been
 5 selected, later in the story -- and we will come to
 6 it -- that PE ACM panels were going on to
 7 Grenfell Tower?
 8 A. Yes.
 9 Q. And she knew that the building, so far as you recall it,
 10 was above 18 metres in height?
 11 A. Correct.
 12 Q. Did you take any steps in the light of the email to make
 13 sure that the right technical specification, including
 14 the core, thereafter was offered on each project by
 15 Reynobond?
 16 A. I personally didn't, no.
 17 Q. Did anybody at CEP?
 18 A. Not that I'm aware of.
 19 Q. What did Debbie French do in that respect, do you know?
 20 A. I don't know.
 21 Q. Having got this email, did you raise the potential
 22 dangers of using ACM PE with anybody on the Grenfell
 23 project?
 24 A. No.
 25 Q. So you didn't raise it, for example, with Studio E?

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1 A. No.
 2 Q. Why is that?
 3 A. I wasn't aware that Studio E was going to be using
 4 Reynobond on the project at that time.
 5 Q. Well, we've seen from the discussions in late 2012 and
 6 certainly February and March 2013 that you were
 7 discussing or proposing Reynobond ACM panels with a PE
 8 core for use on the building as the cladding rainscreen
 9 material.
 10 Having done all that, and having had those
 11 discussions and introduced Debbie French into the story,
 12 why didn't you, having got this email, go to Studio E
 13 and say, "Look, there has been a fire in the UAE, we
 14 have been talking about ACM panels for Grenfell, we need
 15 to be very careful that we get the right core for the
 16 building"? Why didn't you do that?
 17 A. I can't answer that, I've no --
 18 Q. Do you think you should have done?
 19 A. In hindsight, yes.
 20 Q. Yes.
 21 Can you explain how, if Debbie French was able to
 22 control, as she says, what ACM products went on to
 23 Grenfell Tower, Grenfell Tower ended up with an ACM PE
 24 core and not an FR core?
 25 A. I don't know. I can't answer that.

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1 Q. Right.
 2 Did you think that it was any part of your job to
 3 make sure that whatever Debbie French was doing, you
 4 made sure that Studio E and others involved in the
 5 project at the buying end made sure or they knew at
 6 least the difference in terms of fire performance
 7 between PE and FR core?
 8 A. Sorry, can you just repeat that?
 9 Q. Yes, it was a long question. Let me try and shorten it.
 10 Having got this email, did you not think that it was
 11 part of your job -- let me put it neutrally: did you
 12 think it was part of your job to alert Studio E or Rydon
 13 or Harley, whoever you were dealing with, to the
 14 differences between PE and FR core?
 15 A. I don't believe I did, no, personally.
 16 Q. And why was that?
 17 A. No particular reason.
 18 Q. And again, do you think you should have done?
 19 A. In hindsight, possibly, yes.
 20 Q. Were you aware of a fire at Knowsley Heights in 1991,
 21 an exterior fire?
 22 A. I am aware of it, but it was prior to me joining CEP.
 23 Q. It was. When did you first learn about the fire?
 24 A. I couldn't tell you. I couldn't recall. It's something
 25 I'd just heard or became aware of.

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1 Q. Right, before 2012?
 2 A. Probably, yes.
 3 Q. What about the fire at Lakanal House in London in 2009,
 4 were you aware of that?
 5 A. Yeah, I was aware of it, but again I don't particularly
 6 recall it.
 7 Q. Were you aware of a fire at the Mermoz Tower in Roubaix
 8 in France in 2012?
 9 A. No.
 10 Q. An exterior fire? What about the Lacrosse Building in
 11 Melbourne in 2014?
 12 A. No.
 13 Q. What about The Address in Dubai in 2015?
 14 A. No.
 15 Q. The Torch, Dubai, 2015?
 16 A. No.
 17 Q. Did you ever do any investigation yourself into the
 18 history of exterior cladding fires --
 19 A. No.
 20 Q. -- either in the UK or globally?
 21 A. No.
 22 Q. Okay.
 23 Can we then turn to a totally different topic, which
 24 is quotations in December 2013 and then into
 25 January 2014, so moving the story on.

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1 I think it's right, isn't it, that CEP became
 2 involved in the Grenfell Tower refurbishment again,
 3 there having been a gap, in December 2013?
 4 A. Yes.
 5 Q. We left off the story, I think, in April 2013; pick it
 6 up in the December of that year. Do you remember that?
 7 A. I do remember 2013, December 2013.
 8 Q. If we look at {CEP000000267}, this is an email from you
 9 to Mike Albiston of Harley dated 20 December 2013. I'm
 10 sorry, what's gone on to the screen is the end of the
 11 email run. I should show you page 3 {CEP000000267/3}
 12 first, which starts at the foot of page 3, and here is
 13 an email from you to Mike Albiston of Harley on that
 14 date, 20 December 2013:
 15 "Morning Mike,
 16 "Following my telephone conversation with
 17 Mark Harris yesterday, could you please forward your
 18 window and curtain wall schedule. With regards the
 19 rainscreen overcladding we are to offer our system based
 20 on a cassette tray and face fixed ACM ie Reynobond, to
 21 this could you please forward elevation drawings and any
 22 other information you feel is relevant."
 23 Now, you say there that this was further to your
 24 telephone conversation with Mark Harris yesterday, that
 25 would be 19 December.

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1 A. Correct.
 2 Q. Do you remember that conversation?
 3 A. In bits, yes.
 4 Q. What do you remember of it, can you tell us?
 5 A. I'm assuming that I'd spoken to the architects or
 6 somebody and they'd informed me that the job was out to
 7 tender, the project was out to tender. In amongst the
 8 phone call, I contacted Harleys, spoke to Mark Harris.
 9 He advised me I think at the time that they had the
 10 documents. They'd been talking to Studio E in the past
 11 about the project and about the products, and that
 12 Reynobond was within the documents, and could we provide
 13 a price for that, and with an option of rainscreen, with
 14 cassettes and face-fixed panels.
 15 Q. Right. So you rang Mark Harris?
 16 A. Correct.
 17 Q. What prompted you to do that?
 18 A. Because it's the type of work -- Grenfell Tower's the
 19 type of work that Harleys would engage themselves in.
 20 So ...
 21 Q. Yes.
 22 A. It was a case of ringing them to find out if they were
 23 involved in it, as it's the type of work that they work
 24 on.
 25 Q. Yes.

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1 A. And it's in London, so it's on their -- in their area.
 2 Q. We have seen that you had had previous discussions with
 3 Studio E earlier in the year and then there had been
 4 a long gap. So my question is: what after that gap had
 5 prompted you to pick up the telephone at all to anybody
 6 on the project?
 7 A. I may have rung them during the course of the year and
 8 the response could have been that at the moment in time,
 9 "We're still investigating options" --
 10 Q. Right.
 11 A. -- "We haven't finalised any details, give me a call in
 12 three months' time, two months' time", and that type of
 13 thing.
 14 Q. Right.
 15 Was it your habit or practice to, as it were, keep
 16 tabs on potential subcontractors such as Harley because
 17 they offered a business opportunity for you?
 18 A. Occasionally, yes. No, we wouldn't particularly keep
 19 tabs on them; we'd more keep tabs on a project itself to
 20 find out where that was at --
 21 Q. I understand.
 22 A. -- than the subcontractor themselves.
 23 Q. Yes, I see. So does it come to this: you were involved
 24 earlier in the project talking to Studio E, you knew
 25 Harley were a potential subcontractor, you had from time

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1 to time discussions with them about the project, and
 2 this was another --
 3 A. I'd not spoke to Harleys about this project until
 4 December 2013.
 5 Q. So was this the first contact you had had with Harley
 6 about Grenfell?
 7 A. About Grenfell, yes, correct.
 8 Q. You say in the email, "we are to offer our system based
 9 on a cassette tray and face fixed ACM ie Reynobond".
 10 Did Mark Harris ask you to quote specifically on that
 11 basis?
 12 A. I can't confirm that specifically, but as I've mentioned
 13 it here in the email to Mike Albiston, I would propose
 14 that that was raised by Mark Harris. I wouldn't have
 15 had sight of the documents, so I wouldn't know what the
 16 documents consisted of.
 17 Q. So I think you're agreeing that the email rather
 18 suggests that Mark Harris asked you to quote
 19 specifically on that basis.
 20 A. Yes.
 21 Q. Do you remember whether Mr Harris asked you to quote on
 22 the basis of any other product --
 23 A. No.
 24 Q. -- such as Alucobond?
 25 A. No.

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1 Q. So only Reynobond?
 2 A. Yes.
 3 Q. I see. Did you ask him how or why he was interested in
 4 only having Reynobond and no other product?
 5 A. Other than the fact he probably mentioned that it was in
 6 the documents.
 7 Q. Right.
 8 A. And --
 9 Q. Now, let's move to January 2014. Can we go to
 10 {CEP000000205}, please. We can see that here is
 11 an email at the top which responds, at least in email
 12 terms, to your email of 20 December we've just been
 13 looking at, and it comes back to you from Mike Albiston,
 14 6 January, with some attachments, including, the last
 15 attachment, "NBS Spec H92 Rainscreen Cladding". Do you
 16 see that?
 17 A. Yes.
 18 Q. So that's the H92 part of the NBS specification dealing
 19 with rainscreen. It says:
 20 "Hi Geof
 21 "Further to our telephone conversation this morning
 22 please find attached schedules and NBS specifications
 23 for the curtain wall and windows.
 24 "I have also included the NBS specification for the
 25 rainscreen and the elevation drawings. I will also send

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1 you a link for further drawings in Dropbox."
 2 If we go to the attachment, the NBS specification,
 3 H92, it's at {CEP000000215}, please, when you got this
 4 from Mr Albiston on that day, did you look at that?
 5 A. Yes.
 6 Q. If you go, please, to page 2 {CEP000000215/2} of this
 7 document, the specification there under "Type(s) of
 8 rainscreen" you can see is KME Architectural Solutions,
 9 and the product reference is "PROTEUS HR honeycomb
 10 rainscreen panel"; do you see that?
 11 A. Yes.
 12 Q. That's zinc cladding with an aluminium core and
 13 a honeycomb pattern, isn't it?
 14 A. I believe so. As I said earlier, I've never worked with
 15 it, so I'm not aware.
 16 Q. If you turn back a page {CEP000000215/1}, you can see
 17 that there is a reference to some comparison quotations
 18 or comparative supply and install costs. There you see:
 19 "Reynobond - Duragloss 5000:
 20 "Metallic [standard] & non-[standard] (Satin
 21 gloss)
 22 "Chameleon
 23 "Anodised Look (Satin gloss)
 24 "Alucobond:
 25 "Spectra, Sakura 917.

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1 "Zinc:
 2 "QUARTZ ZINC composite polymer panel by VM Zinc
 3 "Note: Face fastened solutions permitted."
 4 Now, what did you understand by "QUARTZ ZINC
 5 composite polymer panel by VM Zinc" to be?
 6 A. I would have taken that to be the zinc that was
 7 discussed way back in, is it, October 2012?
 8 Q. Right. So is that the ZCM supplied by Arconic?
 9 A. Yes, I would believe it was by them.
 10 Q. Right. Not another manufacturer?
 11 A. It could have been.
 12 Q. I see.
 13 According to Debbie French, she says that that was
 14 ZCM manufactured by RCM, so that was your understanding
 15 of that, was it?
 16 A. Yeah, it was a product that we didn't associate with.
 17 Q. Yes.
 18 Then at clause 11 higher up it says:
 19 "Reynobond - Duragloss 5000:
 20 "Metallic [standard] & non-[standard] (Satin
 21 gloss)."
 22 What was "standard" a reference to, did you think
 23 when you saw that?
 24 A. The standard would have been their standard colours.
 25 Q. Right. So not a reference to PE core?

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1 A. Not that I'm aware of, no.
 2 Q. Just picking up the reference to face-fastened solutions
 3 now, what did you understand by that?
 4 A. That would be a -- to me, that would be a reference to
 5 rivet-fixed flat panels.
 6 Q. Right.
 7 It says "permitted"; permitted as opposed to what?
 8 A. How do you mean?
 9 Q. Well, it says "Face fastened solutions permitted". Did
 10 you think when you saw this that you were to quote for
 11 cassette, but that face-fastened solutions were also --
 12 A. I would think that, yeah, they would accept a face-fixed
 13 panel.
 14 Q. I see.
 15 Looking at the different rainscreen products listed
 16 there, did you ask Harley why they weren't asking you to
 17 quote for any product other than Reynobond ACM PE
 18 panels?
 19 A. No.
 20 Q. Then if we go to page 5 {CEP000000215/5} of this
 21 document, still part of the NBS specification, we can
 22 see paragraph 220:
 23 "Specification .
 24 "Compliance standards: The Centre for Window and
 25 Cladding Technology (CWCT) 'Standard for systemised

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1 building envelopes."

2 Did you read that at the time and note it?

3 A. Not in great depth, no.

4 Q. Were you familiar with the CWCT standard, Mr Blades?

5 A. No.

6 Q. In your experience as a cladding fabricator, is the CWCT

7 standard commonly specified in specifications?

8 A. It does occur quite frequently in a specification, yes.

9 Q. Had you come across it before?

10 A. I'd seen that paragraph before, yes.

11 Q. But you hadn't explored what that CWCT standard actually

12 contained?

13 A. No.

14 Q. Had you ever read it?

15 A. No.

16 Q. Right. Have you read it to this day?

17 A. No.

18 Q. Is there a reason why CEP, as a fabricator of cladding

19 panels, were not familiar with that standard?

20 A. My understanding, it was more for companies that did

21 a supply and fix, a total contract supply, as opposed to

22 the manufacture of a panel or of a --

23 Q. Right.

24 A. -- you know, a panel in a rail system.

25 Q. Right.

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1 Was anybody else within CEP, do you know, familiar

2 or had a working knowledge of what the CWCT standard

3 contained?

4 A. I'm not sure, I couldn't answer that.

5 Q. Right.

6 What did you understand was the intended purpose of

7 including the reference to the CWCT standard in this

8 specification?

9 A. I wasn't sure.

10 Q. Did you ask anybody?

11 A. No.

12 Q. Why is that?

13 A. I left those type of questions to designers, who would

14 have a better knowledge of what that referred to than

15 myself.

16 Q. Right.

17 Did you in your mind make any connection between the

18 specification compliance standards CWCT "Standard for

19 systemised building envelopes" here and the list of

20 alternative rainscreen cladding products on pages 1 and

21 2 of this document?

22 A. No, I didn't.

23 Q. Were you aware, in general terms -- I know you say you

24 weren't familiar with the standard -- that the CWCT

25 "Standard for systemised building envelopes" contained

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1 guidance that said that the building envelope shall not

2 be composed of materials which readily support

3 combustion, add significantly to the fire load and/or

4 give off toxic fumes?

5 A. No, I wasn't.

6 Q. You weren't aware of that?

7 A. No.

8 Q. Were you aware that it said that when one of the

9 cladding elements is a composite of two or more

10 materials, the element as a whole must demonstrate the

11 appropriate fire performance?

12 A. No, I wasn't.

13 Q. So do we take it that, at least so far as CEP's

14 involvement was concerned, and that involvement

15 extending to discussions about the appropriateness of

16 Reynobond ACM for the building, did you take any action

17 to ensure that the two standards I've just referred you

18 to were adhered to in any way?

19 A. No. We would have left that to the designing

20 subcontractors.

21 Q. Was it not important for you to know what standards your

22 client had to meet so that you could provide a suitable

23 product or suitable finish product for applying to the

24 building?

25 A. Can you just rephrase that one, please?

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1 Q. Yes. Was it not important for you to know what

2 standards your end users had to meet -- this is an NBS

3 specification --

4 A. Probably would have been in hindsight now.

5 Q. Right, I see. So you accept that you should have done

6 but didn't at the time?

7 A. Yes.

8 Q. Yes.

9 Do we take it from your answers earlier on the

10 Debbie French email of 13 May, and looking at the

11 NBS specification and putting the two together, that

12 even though you saw the 13 May email about the fires in

13 the UAE, you didn't change your approach and make sure

14 that your products, when used on buildings in excess of

15 18 metres, would comply with the CWCT guidance?

16 A. I didn't personally, no.

17 Q. And why is that?

18 A. It would have been beyond my knowledge of those

19 technical points, and I would have had to refer those

20 back to the technical designer or somebody with more

21 knowledge of those documents than myself.

22 Q. Can I then turn to the subject of insulation.

23 Now, if we stick with the NBS specification document

24 and go on in it to page 10 {CEP000000215/10}, you can

25 see there that we have at the top of the page

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1 paragraph 776, under the heading "Thermal insulation",
 2 and in the second bullet point down:
 3 "Manufacturer: Celotex Ltd ..."
 4 Just a bit below that you can see:
 5 "Product reference: FR5000 aluminium foil faced both
 6 sides."
 7 Three lines down below that, that's where we find
 8 the required performance.
 9 Now, did you read this part at the time, this part
 10 of the NBS spec?
 11 A. Probably not.
 12 Q. Why is that?
 13 A. We've never used -- CEP would never use a product like
 14 Celotex. We've always used mineral wool.
 15 Q. Right.
 16 A. Duoslab, Rockwool Duoslab, Knauf.
 17 Q. Can you just explain why that is?
 18 A. From what our design engineer tells us, that is
 19 non-combustible and that's all he would ever put in. If
 20 it was a CEP project --
 21 Q. Yes.
 22 A. -- we would always use a mineral wool.
 23 Q. You always use a mineral wool?
 24 A. Always use -- a CEP project always use mineral wool.
 25 Q. When you say a CEP project, do you mean one which was a

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1 bespoke --
 2 A. If we designed -- if the design element was by CEP.
 3 Q. Why is that, can you explain?
 4 A. Because it was -- well, I was told and led to believe,
 5 and that was the reason that Mark Heywood Associates --
 6 it was non-combustible and he wouldn't, or they as
 7 a company -- he would never sign anything off other than
 8 that, from a CEP point of view.
 9 Q. Given that, as you say, it sounds like a golden rule
 10 that CEP, when designing the full package, would never
 11 use a product like this Celotex product, can you explain
 12 why you didn't spot its presence here in the
 13 NBS specification?
 14 A. I probably skipped over it, to be honest, on that --
 15 Q. Right.
 16 A. Because my quotation, which no doubt we'll go on soon,
 17 qualifies that we have used mineral wool.
 18 Q. Would it not have stuck out like a sore thumb to you?
 19 A. I wasn't aware of Celotex, to be honest. I wasn't aware
 20 of the company name, albeit I can read now and
 21 understand what that product is.
 22 Q. Yes.
 23 A. But we would never have quoted that, even if it's in the
 24 documents.
 25 Q. Had you spotted that this was a rigid polyisocyanurate

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1 insulation board being proposed within the NBS spec
 2 together with a Reynobond as an alternative, what would
 3 you have done?
 4 A. Well, as we was quoting another company,
 5 a subcontractor, I would take it that the architect and
 6 all the other people who have been involved in the
 7 design and putting together this specification, they
 8 would have knowledge of this product and they would deem
 9 it to be acceptable. As I say, CEP wouldn't use that as
 10 a product.
 11 Q. Going back a little bit to an answer earlier on about
 12 Mark Heywood would only ever use a non-combustible
 13 insulation, can you explain why that is, and in
 14 particular why that is the case where it's being used
 15 with, for example, an ACM rainscreen panel?
 16 A. I can't answer why Mark Heywood Associates always used
 17 a mineral wool, but that is all that he's ever used, as
 18 far as I'm aware, on all CEP projects.
 19 Q. Right. Do you know why that is?
 20 A. He believes -- well, it is non-combustible, which is
 21 a product that he will work with.
 22 Q. Right.
 23 Was it something -- I don't want to put a thought
 24 into your mind, but I'll try to prompt it if I can. Was
 25 there something in his concerns that you knew about,

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1 about mixing a PIR insulation product with a rainscreen
 2 panel comprising --
 3 A. I don't believe so. I think it was, as Mark Heywood
 4 Associates, a business, they had a view that they would
 5 only use mineral wool insulation.
 6 Q. Right.
 7 Were you aware of the difference in terms of fire
 8 performance between PIR, which is what this Celotex
 9 product is or was, and mineral wool at the time you
 10 received this specification?
 11 A. No. No.
 12 Q. Were you aware, at least in general terms, of the role
 13 that combustible insulation can have in an exterior
 14 fire?
 15 A. Not really, no.
 16 Q. Having seen the NBS specification -- and I take your
 17 point that you didn't read it all -- did you have
 18 a discussion with Deborah French about the
 19 appropriateness of using PIR as the insulation material
 20 together with the rainscreen ACM that she was --
 21 A. I don't recall I did, no.
 22 Q. -- proposing? Right.
 23 Did you ever have a discussion at all with Studio E
 24 or Harley or Rydon --
 25 A. No.

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1 Q. -- about the insulation?
 2 A. No.
 3 Q. Can we then go to {CEP000000244}, please. This is
 4 an email chain between you and Deborah French in early
 5 January 2014, and this is now on 7 January 2014. If we
 6 go to the bottom of page 1, we can see you go to
 7 Deborah French on that day, so this is the day after you
 8 get the NBS spec, and you say:
 9 "Hi Debbs
 10 "Please see the attached rainscreen spec ref the
 11 above.
 12 "Could you please advise rates for Reynobond
 13 accordingly."
 14 Do you see that?
 15 A. Yes.
 16 Q. Then you end the email, and we need to turn to page 2
 17 {CEP000000244/2} for that:
 18 "Catch up with you these next couple of weeks."
 19 Would you normally send a manufacturer an NBS
 20 specification for a particular project?
 21 A. Not normally, but in this instance, because we was
 22 asking for -- well, we were sending this specification
 23 over to her with the various colour options, we'd be
 24 sending it there for her reference. Probably more for
 25 prices for the two -- for the colours, the chameleon and

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1 the other colours that were referenced in there.
 2 Q. Right.
 3 Why did you think she needed to see the full
 4 NBS specification that you had been sent by
 5 Mike Albiston the day before in order simply to quote
 6 rates for Reynobond that you had asked her for?
 7 A. I don't recall. It could have been simply just to
 8 forward that part of the documentation we received from
 9 Harleys, than try and separate out pages.
 10 Q. Yes, I can see that it would have been convenient, but
 11 why did you send her the whole thing as opposed simply
 12 to separating it out and saying, "Well, could you please
 13 quote for these particular Reynobond products?"
 14 A. I don't recall. As I say, it was probably simpler just
 15 to send that than to try to separate pages out.
 16 Q. Right.
 17 Did you expect her to advise you or tell you about
 18 whether the Reynobond products listed in the
 19 NBS specification were appropriate for the
 20 Grenfell Tower project?
 21 A. I didn't send that with that purpose in mind.
 22 Q. No, but did you have an expectation that if there was
 23 something inappropriate or wrong, she would tell you?
 24 A. I would have thought so, but it wasn't -- as I say, it
 25 wasn't in my mind to do that, that wasn't the purpose.

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1 If they had spotted something that they had a concern
 2 about, then I would expect them to flag it up. But, as
 3 I say, it wasn't the purpose of sending that document
 4 across in its fullness.
 5 Q. Right.
 6 Given the email that you had received from
 7 Debbie French on 13 May 2013 about controlling the
 8 supply --
 9 A. Yeah.
 10 Q. -- why didn't you expect her to tell you if she had seen
 11 something wrong with the specification or something that
 12 didn't fit?
 13 A. I probably didn't link those two, the email I sent and
 14 the email that we received in May 2013.
 15 Q. You didn't put the two and two together?
 16 A. I didn't put the two and two together.
 17 Q. Right.
 18 Did you and she speak after you sent the
 19 specification to her, do you think?
 20 A. I can't recall.
 21 Q. Let's scroll up to the top email in the chain
 22 {CEP000000244/1}. This is hers to you of
 23 15 January 2014, and she says here that she's confirming
 24 the "exceptionally good rates I quoted you for
 25 Grenfell Towers!!" and then she sets out some

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1 specifications, and then underneath that a price:
 2 £28 per square metre.
 3 Was there a discussion about these rates between you
 4 and her before she sent you this email?
 5 A. No.
 6 Q. Because she says "Just to confirm". It looks from that
 7 as if there was an earlier discussion which she's now
 8 confirming.
 9 A. If there was, I don't recall it.
 10 Q. All right.
 11 She is quoting £28 per square metre which she
 12 describes as "exceptionally good". Was it? Was it
 13 exceptionally good at that price?
 14 A. I can't recall what the rates were for any other
 15 project, to be honest.
 16 Q. We've seen in your January email -- and it's short, we
 17 can go back to it if we need to -- that you didn't
 18 specify what sort of core you wanted for the ACM, FR or
 19 PE, and nor did the specification that you sent her.
 20 When she came back to you on 15 January, as we see
 21 here, she didn't specify whether she was quoting PE or
 22 FR either, did she?
 23 A. I believe not, no.
 24 Q. What did you understand she was quoting for, PE or FR?
 25 A. I would have understood that that would be the standard

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1 Reynobond product that had been used in the past by CEP
 2 and other companies, and looking at it now, that would
 3 have been the PE core.
 4 Q. Right. So you refer to the PE as the standard Reynobond
 5 product --
 6 A. Yes.
 7 Q. -- used in the past by CEP?
 8 A. As I said, we would ask for Reynobond as a product for
 9 samples and price. The core was never discussed.
 10 Q. I see. So am I right then in -- well, let me ask you
 11 for your comment on this: was it the case that in your
 12 understanding at this time, early 2014, if someone asked
 13 for ACM, that would be PE core ACM?
 14 A. Yes, correct.
 15 Q. Now, we see £28 per square metre. Is that not rather
 16 higher than you would usually pay for Reynobond?
 17 A. I don't recall, I don't know. We got prices per project
 18 in varying colours.
 19 Q. Right. Can I just suggest to you that in fact you would
 20 normally pay £4 or £5 less than £28 per square metre.
 21 A. Okay.
 22 Q. Yes, you would accept that?
 23 A. If -- I couldn't tell you.
 24 Q. Let's have a look at what Debbie French says. It's
 25 {MET00053162/22}. This is her witness statement of

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1 4 November 2019. At page 22, paragraph 76, she says
 2 that she sees that she did provide a quote of £28 square
 3 metres for Reynobond. She says:
 4 "I cannot recall the exact details of how
 5 I calculated this quotation. However, this was a
 6 relatively high price for Reynobond and CEP would have
 7 known this because of their involvement in the market
 8 and the fact that they had purchased Reynobond on
 9 previous occasions. From the best of my memory
 10 I included a price at this level because I was aware
 11 that there was to be some form of discussion or
 12 negotiation between CEP/Harley and the project managers
 13 and I make reference in the email to the price being a
 14 good starting point. I do not remember any discussions
 15 about price at the time."
 16 So did you understand Deborah French to be quoting
 17 £28 per square metre expecting to be knocked down a bit?
 18 A. From this I would say yes.
 19 Q. Well, this is her, this is what she intended. What was
 20 your understanding?
 21 A. In the natural course of projects like these, the
 22 client, the contractor, down the supply chain, they
 23 always want a little bit off somewhere along the way.
 24 Q. Let's go back to the email, then, which is at the top of
 25 {CEP000000244}. She says:

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1 "Hope this is OK to start the bidding with Harleys,
 2 I am sure you or Neil will be back on the phone if you
 3 need any other details /reductions."
 4 And then there is whatever the opposite of a smiley
 5 face.
 6 A. Yeah.
 7 Q. Did that not suggest to you at the time that she might
 8 expect to be knocked down further on the price?
 9 A. Yes, it would sound that she was expecting that there
 10 would be a request for a keener price throughout the
 11 supply chain. She was probably pre-empting what was
 12 going to happen.
 13 Q. Given that by this stage you knew that FR was available
 14 as a core, and given the warning that Debbie French had
 15 given about FR as opposed to PE and controlling the
 16 supply route carefully, can you explain why you didn't
 17 seek a quotation for the FR core ACM, given that you
 18 knew that it was going to go on to a building over
 19 18 metres in height.
 20 A. We were never -- CEP were never asked for an FR core,
 21 and to the best of the knowledge, we understood that the
 22 class 0 Reynobond met the Building Regulations, and --
 23 Q. Is that why you didn't seek a quote for the FR core?
 24 A. I would say so, yes.
 25 Q. Did you seek any quotations for any other manufacturers,

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1 for example Alucobond at this stage?
 2 A. No.
 3 Q. Is that for the same reason I asked you before?
 4 A. Yes.
 5 Q. Essentially, you said politeness, I said loyalty.
 6 A. Correct.
 7 Q. We may agree or disagree about that, but the same
 8 rationale.
 9 A. Same ra -- yeah, yeah.
 10 Q. Now, if we go to {CEP000000268}, please, this is
 11 an attachment that you sent to Mike Albiston on
 12 21 January containing the CEP quote, and this one is for
 13 a Metal Tech system, thermally broken aluminium profile
 14 windows and the rainscreen overcladding.
 15 There is another one I think you remember which had
 16 a quotation for Wicon windows, but the same cladding
 17 quotation.
 18 A. Correct.
 19 Q. You sent him two quotations on that day.
 20 A. Correct.
 21 Q. Just for our record references, that one is at
 22 {CEP000000270}, but this one, {CEP000000268}, says in
 23 terms of rainscreen, halfway down:
 24 "Rainscreen Overcladding. Panels are to be
 25 manufactured utilising 4mm Reynobond ACM."

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1 When it says "are to be manufactured", does that
 2 reflect the fact that you were asked specifically by
 3 Mike Albiston to quote for panels using 4-millimetre
 4 Reynobond ACM?
 5 A. That sentence is a standard sentence within a quotation
 6 that CEP would send out.
 7 Q. I see.
 8 A. It could have been panels may be manufactured
 9 utilising ...
 10 Q. Yes.
 11 A. It could have been manufactured utilising Steni, for
 12 instance, but the wording would have been -- it was
 13 a fairly standard sentence.
 14 Q. I see. So "are to be" doesn't reflect a specific
 15 request from the --
 16 A. No.
 17 Q. No, and to be fair to you, in fact the quotation that
 18 you supplied to Mohit Kotecha in February 2013 contained
 19 the same wording.
 20 Following these quotations in 2014 -- I'm so sorry,
 21 let me go back just to ask one or two questions.
 22 We saw in the H92 specification that CEP should have
 23 quoted for Proteus HR honeycomb. Is the reason why CEP
 24 didn't provide a quotation for that that CEP simply
 25 didn't fabricate --

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1 A. We never used the company.
 2 Q. No.
 3 A. Yeah.
 4 Q. And why not a quotation for Alucobond or Quartz Zinc?
 5 A. The Alucobond I think we've covered, and we don't do
 6 zinc.
 7 Q. Turning to later in 2014, do you remember that cladding
 8 samples were sent for the Grenfell Tower project?
 9 A. Sorry, which month?
 10 Q. 2014, later in 2014, the summer of 2014.
 11 A. Yes, there were some requested.
 12 Q. Normally, am I right that samples are normally provided
 13 as a small flat sheet which consists of a sample of the
 14 composite panel?
 15 A. Yes.
 16 Q. So you get the aluminium sheet and then the core in the
 17 middle --
 18 A. Yes.
 19 Q. -- as a square?
 20 A. Post card sized, normally.
 21 Q. Let's see if we can get a picture, {SEA00014456},
 22 please. This is a photograph of one of the samples
 23 which was sent to Studio E.
 24 A. Yeah.
 25 Q. Can you see that?

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1 A. Yes.
 2 Q. Now, we can see here that it actually says this sample
 3 has an FR core. Do you see that?
 4 A. I do, yes.
 5 Q. Given that you hadn't been asked to quote for FR, why
 6 were you sending a sample of FR-cored ACM?
 7 A. I'm not aware that that came directly via CEP.
 8 Q. I see. I see.
 9 Let's see what you did see. You were copied in on
 10 a number of emails arranging for the delivery of the
 11 samples, weren't you? Not all of them, but some of
 12 them. Let's have a look at one. {CEP000000275}. The
 13 second email down on that page is an email from
 14 Deborah French to Mark Harris, 19 March:
 15 "Hi Mark
 16 "Good news ref Grenfell Towers, in terms of samples
 17 and colour options I will arrange to send the
 18 following."
 19 Then she sets out a number of colours, and then
 20 after the second set of products she says:
 21 "GWEN could you please arrange to have the above
 22 samples 4 x A6 sent out to mark Harris at Harley Curtain
 23 Walling ASAP."
 24 Then you are copied in on that. This is on 20 March
 25 at the top of the page:

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1 "Hi Geof
 2 "FYI, email and samples we are sending over to Mark
 3 @ [Harley Curtain Wall] ref [Grenfell] debbs."
 4 Did you see these samples that were sent?
 5 A. No.
 6 Q. Were there any telephone conversations you had with
 7 Arconic about sending samples to Harley?
 8 A. No.
 9 Q. In any of the exchanges that you had about samples, do
 10 you remember any discussions about what the core of the
 11 ACM would be, FR or PE?
 12 A. No.
 13 Q. Do you understand or know why the picture of the sample
 14 I showed you earlier was a picture of a sample panel
 15 with an FR core?
 16 A. No.
 17 Q. Can we then turn to the mock-up in June 2014.
 18 Do you remember CEP was asked in June 2014 to make
 19 a mock-up of the façade?
 20 A. Provide samples for the mock-up, yes.
 21 Q. Provide samples, right.
 22 Let's go first to {CEP00051814}. This is an email
 23 of 25 June 2014 from Sam Anketell-Jones -- he is
 24 Dan Anketell-Jones' brother -- to you. Attachments:
 25 "Latest Grenfell drawing 25.6.14":

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1 "Hi Geof,
 2 "The attached PDF shows the whole mock up, this
 3 should clear some things up for you."
 4 Do you remember what it was that needed clearing up
 5 which you had asked him to clear up?
 6 A. I don't, no. Maybe it was the measurements of some
 7 panels or the colour reference, I don't know.
 8 Q. Right. It appears from this that you had asked for the
 9 whole mock-up. Do you remember why that was?
 10 A. We were asked to provide panels for the mock-up for
 11 Harleys, or Harleys asked for a mock-up to be made and
 12 we were asked to supply the panels.
 13 Q. Right. Let's go to the document, we need the offline
 14 reference, please, {CEP00051815}.
 15 Do you recognise this as the drawing that was sent
 16 by Sam Anketell-Jones to you?
 17 A. I recognise the drawing. I can't say it was Sam that
 18 sent it me, but I believe that would be the case then.
 19 Q. We can see at the bottom of the page that it was created
 20 by Harley on 10 June 2014, if we just go to the very
 21 bottom, drawn by SAJ.
 22 A. Yeah.
 23 Q. Sam Anketell-Jones. If we go to the top right-hand
 24 corner, we can see it says "For Viewing Purposes Only,
 25 No insulation on Mock-up". Do you see that?

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1 A. Yes.
 2 Q. Did you see that? Did you spot that?
 3 A. I would have done, yes.
 4 Q. Did you investigate what the insulation was going to be?
 5 A. No. From that point they didn't require insulation on
 6 the mock-up.
 7 Q. You say from that point?
 8 A. It was just they were looking to provide just the
 9 panels.
 10 Q. Right.
 11 A. No insulation.
 12 Q. Oh, I see, so the mock-up didn't actually have the
 13 insulation on it, just the panels?
 14 A. I believe not, yeah.
 15 Q. Now, if we look at the drawing, we can see that there
 16 are, I think, three different finishes: champagne
 17 metallic, smoke silver metallic and natural aluminium
 18 brushed. Is it right, all of those are Reynobond ACM PE
 19 core?
 20 A. As far as I'm aware they are, yes.
 21 Q. Is it usual for only one type of cladding to be
 22 considered at a mock-up, or was it usual?
 23 A. Yes, it's usual once they've got to a point where that's
 24 what the client and design team and subcontractors are
 25 looking at.

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1 Q. These are all face-fixed, aren't they, Reynobond ACM?
 2 A. They appear from the drawing. Whether they were on the
 3 mock-up, I couldn't tell you.
 4 Q. The note says that the drawing represents a temporary
 5 mock-up structure to show panel positions and colours
 6 for visual purposes only. Do you know why only the
 7 face-fixed panels were shown in the mock-up and no
 8 cassette?
 9 A. I don't, no.
 10 Q. Because we can see that no cassette-fixed was supplied
 11 for the mock-up. Do you know why one wasn't?
 12 A. I don't.
 13 Q. Were you aware that, at this stage, the planners and
 14 indeed Studio E were leaning heavily towards a cassette
 15 fix?
 16 A. No.
 17 Q. Did you get any sense from your dealings with Harley or
 18 Studio E or Rydon at this time, so far as you had any --
 19 A. No.
 20 Q. -- that there was a -- I wouldn't say a dispute, but
 21 perhaps a difference of view as to whether face-fixed or
 22 cassette should be used?
 23 A. No, I wasn't aware of anything that went on.
 24 Q. Did you wonder why you weren't asked to provide
 25 a cassette?

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1 A. For the mock-up?
 2 Q. For the mock-up.
 3 A. Not particularly. As my understanding and CEP's
 4 understanding were, it was to show the colours more
 5 than ... so it -- you know, I never asked --
 6 I personally never asked a question. I don't think
 7 anyone else did.
 8 Q. Right. Because, of course, if it's just for the
 9 appearance, it still makes a difference whether it's
 10 cassette or face-fixed, so I just wondered whether it
 11 had gone through your mind to ask --
 12 A. No.
 13 Q. -- why it was that a cassette mock-up wasn't also
 14 required.
 15 A. No.
 16 Q. In terms of what was required for the physical mock-up,
 17 we know that Arconic sent smoke silver and metallic
 18 champagne, both with a PE core. Do you remember that?
 19 A. I remember samples coming in.
 20 Q. Yes. Then if we go to {ARC00000098} we can see the
 21 email chain about the cladding for the mock-up, and
 22 I would like to go with you, please, to the bottom of
 23 page 1 and the top of page 2 {ARC00000098/2}.
 24 At the bottom of page 1 and the top of page 2, this
 25 is an email from Deborah French of Thursday, 22 May 2014

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1 to Gwenaëlle Derrendinger, copied to you. Do you see
 2 that?
 3 A. Yes.
 4 Q. "Hi Gwen", and then if we go to the top of page 2, she
 5 says:
 6 "We spoke this afternoon about Natural Brushed
 7 Aluminium panels H 9103 S we have at the factory, could
 8 we please send as FOC MOCK up material for project
 9 GRENFELL Towers to CEP Façades."
 10 Then she gives the measurements.
 11 "Many Thanks
 12 "Debbs."
 13 So you can see from this email that you were going
 14 to be getting that product as part of the mock-up, and
 15 if we go to the top of page 1 {ARC00000098/1} we can see
 16 that Ms Derrendinger responds the next day, 23 May,
 17 "Dear Debbie", and you're copied in on this as well,
 18 Mr Blades:
 19 "As spoken yesterday on the phone we have some
 20 Reynobond 55 FR sheets on stock in 4 x 1500 mm x
 21 different lengths (including length below required
 22 2270 mm) that we could use for this mock-up."
 23 So we see her offering FR core ACM for the mock-up.
 24 Did you accept that offer?
 25 A. I can't recall whether we took those panels or whether

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1 we took the original ones.
 2 Q. Did it occur to you as odd or unusual, perhaps, that you
 3 were being offered Reynobond 55 FR sheets for the
 4 mock-up?
 5 A. The way I would have read that at the time, there was --
 6 it may be that those panels were quicker to despatch
 7 than the other requirements.
 8 Q. Could you see from this that, at least so far as Alcoa
 9 was concerned, Deborah French and
 10 Gwenaëlle Derrendinger, they saw Reynobond 55 FR sheets
 11 as interchangeable with PE sheets, at least so far as
 12 the mock-up was concerned?
 13 A. I agree, yes.
 14 Q. Did you think to explore with them whether in fact,
 15 given that Grenfell Tower was a building in excess of
 16 18 metres, you should actually be suggesting FR core to
 17 the client?
 18 A. I didn't, and I don't believe CEP did, and at this stage
 19 of the project we were just working to other people's
 20 requirements.
 21 Q. Yes.
 22 It's right, I think, that you were actually then
 23 sent an ACM panel for the mock-up with an FR core,
 24 weren't you?
 25 A. I can't remember.

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1 Q. Let's have a look, {ARC00000103}. This is an order
 2 acknowledgement dated 10 June 2014, so the same date as
 3 the drawing that we saw earlier with the mock-ups on it,
 4 and we can see from this order acknowledgement that the
 5 natural brushed aluminium was supplied with an FR core.
 6 Do you see that?
 7 A. I do, yes.
 8 Q. Yes, and it was despatched, I think, on 6 June 2014,
 9 delivery conditions: DAP St Helen's, and the delivery
 10 address at the bottom is CEP Architectural Façades in
 11 St Helen's. Do you see that?
 12 A. Yes.
 13 Q. The product, "Reynobond 55 Natural Aluminium H9103S
 14 Washcoat", and then "Reverse side coating: FR". Do you
 15 see that?
 16 A. Yes.
 17 Q. So it looks on the face of this document that an FR
 18 panel was supplied for the mock-up.
 19 A. Yes, I will agree with what's in front of me.
 20 Q. And that it went to CEP Architectural Façades.
 21 A. Yes.
 22 Q. And in the box at the bottom it says:
 23 "Mock-up for Grenfell Tower project to the attention
 24 of Geof Blades."
 25 That's you.

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1 A. Yes.
 2 Q. So you would have received, looking at this document --
 3 is this right? -- an FR Reynobond 55 panel?
 4 A. That panel would have come into the factory. I wouldn't
 5 necessarily have seen the panel, because at that stage
 6 all in CEP were aware that the panel was coming in to be
 7 shipped back out for a mock-up, so it was a case that
 8 the panel was coming to us. I guess from this that we
 9 had to do some work, cut it to a size, maybe just drill
 10 some holes. It was coming in to us to ship down to
 11 Harley.
 12 The fact that it's for my attention was -- I was
 13 probably a point of contact through the emails. I may
 14 or may not -- I don't recall particularly seeing the
 15 panel, it would have come in to the factory, onto the
 16 shop floor. You know, I would have no particular reason
 17 to go and inspect the panel itself per se.
 18 Q. Would you not, given that you were involved closely in
 19 the arrangements for the mock-up?
 20 A. It was a name on a delivery address that came into the
 21 factory. Could have been any one name. It could
 22 have -- it wouldn't have had to be my name, it could
 23 have been just the company address and the panel would
 24 have arrived on the shop floor, and following the
 25 information that Sam Anketell-Jones had passed, the

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1 panel would be shipped out in accordance with that.
 2 So I don't recall seeing the panel. I was probably
 3 aware that it had come in, so I could advise -- or
 4 somebody from CEP could advise Harleys that the panel
 5 had come in and it was going out.
 6 Q. It says on the document, "Mock-up for Grenfell Tower
 7 project to the attention of Geof Blades", and my
 8 question is: given that it was for your specific
 9 attention, why would you not have gone to see it, made
 10 sure it was the right thing and made sure that what was
 11 going out to Harley for their mock-up was appropriate?
 12 A. I would have -- maybe I went down and looked to make
 13 sure it was the right colour.
 14 Q. Do you remember?
 15 A. I don't, no. I don't recall, no.
 16 Q. I mean, on the face of the documents we've seen so far,
 17 it does very much suggest that you were, at least by
 18 this time, June 2014, aware that Reynobond 55 came in
 19 an FR and was suitable, at least for the purposes of
 20 a mock-up, for use at Grenfell, and I've got to put it
 21 to you: was this not something of a missed opportunity?
 22 A. In hindsight, yes.
 23 Q. Yes.
 24 Now, were you at the mock-up, the actual viewing of
 25 the mock-up?

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1 A. No, I wasn't.
 2 Q. Was anybody from Arconic, to your knowledge?
 3 A. I can't tell you who was there.
 4 Q. Was anybody else from CEP there?
 5 A. Not that I'm aware of, no.
 6 Q. Now, CEP I think didn't charge for the fabrication of
 7 the mock-up, did it?
 8 A. Correct.
 9 Q. Can we go to {CEP000004296}, please. This is an email
 10 chain in June 2014, and if we go to the second email in
 11 the chain, it's from Mark Harris to you on 17 June 2014.
 12 If we look at the fourth paragraph down, it says -- this
 13 is about the mock-up:
 14 "Rydon are looking to Harley and its supply chain to
 15 provide the mock-up free of charge. Certainly, Alcoa
 16 have stepped up to the plate and agreed that the
 17 material will be free of charge. From Harley's end, we
 18 will provide the mock-up design and installation free of
 19 charge, and will look to your good selves as our supply
 20 chain partner for fabrication and delivery of the panels
 21 on a free of charge basis."
 22 The description by Mark Harris of CEP as Harley's
 23 supply chain partner, is that something you would agree
 24 with? Were you their supply chain partner in that
 25 sense?

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1 A. We supplied to them, and in this instance we would
 2 probably have been a supply partner.
 3 Q. Yes.
 4 A. I think that's a little bit of overegging the pudding,
 5 but yes, we were a supply chain company to them.
 6 Q. Was the reason CEP did the mock-up for free because you
 7 were expecting or at least hoping that CEP would be
 8 chosen for the fabrication for the project?
 9 A. Yes. And they probably wouldn't have paid for it
 10 anyway, they would have wanted it free. That's the
 11 nature of the business.
 12 Q. No, I understand.
 13 Can I go, then, in light of the nature of the
 14 business, to an email chain from the same period. This
 15 is {CEP000005371/2}. We can see an email from
 16 Simon Lawrence to Bruce Sounes and Mark Harris, copied
 17 to Ray Bailey. You see that?
 18 A. Yes.
 19 Q. You wouldn't have seen that at that moment.
 20 If we look at the fourth bullet point down,
 21 Mr Lawrence says:
 22 "Mark [that's Mark Harris] to contact Reynobond
 23 about time scales to get materials for Mock-up - Natural
 24 Aluminium Brushed H9103 S & Champagne Metallic E1101 S."
 25 Then if we look at the bottom of page 1

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1 {CEP000005371/1}, we can see what happens to this email
 2 chain. You can see that Mark Harris sends that email on
 3 to Deborah French on the same day, half an hour later,
 4 and it's copied to you. Do you see that?
 5 A. Yeah.
 6 Q. "Deb, Geof
 7 "To keep you in the loop.
 8 "This will be no problem for CEP, they have very
 9 little on at the moment ha ha!!"
 10 Then going up the chain, you can see that
 11 Deborah French responds on 9 June to Mark Harris, copied
 12 to you:
 13 "Mark your(sic) cruel [smiley face]
 14 "I will bring the smelling salts round Geof!!"
 15 Then you respond the same day a few minutes later to
 16 Deborah French and Mark Harris saying:
 17 "Nothing's [too] much for us at the moment, we just
 18 keep [fabricating] rainscreen and glazing and then send
 19 it out with which ever project was last spoke about!!
 20 LOL
 21 "Mark,
 22 "All I can say is, that you'll be taken out for a
 23 very nice meal very soon somewhere very nice."
 24 Now, I've shown you all of that.
 25 Were you expressing gratitude in this email for your

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1 involvement in the project?
 2 A. Not particularly. It was a turn of phrase that I think
 3 is used, and I think it was just meant tongue in cheek
 4 that ... what it says, you know, you may get something.
 5 I don't think it's meant to be the way it's being
 6 presented.
 7 Q. Well, it says what it says --
 8 A. Yes.
 9 Q. -- and I'm just asking you: were you expressing
 10 gratitude to Mark for involving you in --
 11 A. I was thanking him for giving us the opportunity to
 12 quote them, yes.
 13 Q. Yes. Is that because you felt Harley had done you
 14 a favour by pushing the Grenfell Tower project your way?
 15 A. I wouldn't have said they had done us a favour but they
 16 had certainly given us the opportunity of the business.
 17 Q. Yes.
 18 Can we turn on, then, in the story.
 19 Is it right that, from June 2014 at the latest, the
 20 only cladding being discussed so far as you were aware
 21 was Reynobond PE ACM?
 22 A. On Grenfell?
 23 Q. On Grenfell, yes.
 24 A. Yes.
 25 Q. Yes.

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1 If we go into August 2014, {CEP000000443}, please,
 2 this is an email chain that starts at the end of July.
 3 If we look at the second email down on that page,
 4 Mark Harris sends an email to you, copied to
 5 Deborah French, 31 July:
 6 "Geof/Deb
 7 "Copy for your interest ..."
 8 And below that you can see that Simon Lawrence was
 9 telling Harley that, in the third line:
 10 "... the client has just confirmed to planning that
 11 they are looking to proceed with the Reynobond Champagne
 12 colour (as shown on the mock-up) for the main body of
 13 the building and the cladding will be the 'cassette'
 14 fixing version."
 15 So you're sent that.
 16 If we then go to the top of the page, we can see
 17 that the next day, 1 August 2014, Deborah French
 18 responds to Mark Harris and you:
 19 "Hi Mark
 20 "It's getting exciting ... thank you for your hard
 21 work and perseverance in putting Reynobond forward.
 22 I think I owe you and Geof either lunch or dinner at
 23 some point.
 24 "Debbs."
 25 Now, presumably -- is this right? -- Deborah French

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1 was also very grateful to Mark Harris and to you for
 2 involvement in the project.
 3 A. I would think that's a question for Deborah French to
 4 answer.
 5 Q. Okay.
 6 Was it your understanding, receiving this email from
 7 Deborah French, that she was grateful to you, given that
 8 you were one of the invitees to the lunch or dinner that
 9 she was proposing?
 10 A. All I can say is that the three companies acted very
 11 professionally and I never got took out for lunch by
 12 anybody. I take it from that that Debbie French was
 13 thankful that Reynobond had got some work out of
 14 a project in the UK.
 15 Q. You may or may not have got your lunch, Mr Blades --
 16 A. I didn't --
 17 Q. -- but the point is she was grateful to you for your
 18 role in putting Reynobond forward.
 19 A. It would appear so, yes.
 20 Q. Yes.
 21 Can we then look at your second statement,
 22 paragraph 62. This is {CEP00064247/13}, paragraph 62.
 23 You say there, and we looked at this before:
 24 "No, I did not put Reynobond forward."
 25 In the light of this email that we've just been

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1 looking at, it wasn't only Mark Harris who was putting
 2 Reynobond forward, it was you as well, hence
 3 Debbie French's gratitude to you and the offer of lunch
 4 or dinner.
 5 A. I would say, yes.
 6 MR MILLETT: Yes.
 7 Mr Chairman, we're going to turn to a different
 8 topic, a slightly longer than one, which will take me
 9 well beyond the next ten minutes and a break. I don't
 10 know whether --
 11 SIR MARTIN MOORE-BICK: Would you rather break at this
 12 point?
 13 MR MILLETT: Well, it might be sensible. It depends on how
 14 long that topic takes. It might take 15 minutes, it
 15 might take five, it depends, but I would rather not take
 16 the chance.
 17 SIR MARTIN MOORE-BICK: All right. We will have a break
 18 there then, if you like.
 19 MR MILLETT: I'm happy to continue, but we could ...
 20 SIR MARTIN MOORE-BICK: Well, it's --
 21 MR MILLETT: It's a bit early, isn't it?
 22 SIR MARTIN MOORE-BICK: -- quite early, yes. See if you can
 23 do it in 5 rather than 15.
 24 MR MILLETT: All right, I'll take the risk.
 25 I want to ask you about the BBA certificate.

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1 SIR MARTIN MOORE-BICK: Sorry, I should have asked you: are
 2 you happy to carry on for another 10 or 15 minutes?
 3 A. Five minutes with yourself, sir, five minutes.
 4 SIR MARTIN MOORE-BICK: We both think five minutes.
 5 MR MILLET: Well, let's see, it may not be.
 6 We have talked about the BBA certificate, or around
 7 the subject. I'd like to talk about it in particular.
 8 Can we start with {CEP000000281}, please. This is
 9 an email of 23 April 2014 from Debbie French to
 10 Mark Harris. You can see it there. You are copied in
 11 on it, as is Mike Albiston at Harley. Attached to that
 12 are a series of documents, the first of which is the
 13 BBA certificate, 08/4510, as a pdf. Do you see that?
 14 A. Yes.
 15 Q. That email followed, as you can see just below it,
 16 a request by Harley, which I don't need to show you.
 17 I want to show you the certificate. That's at
 18 {CEP000000282}, please.
 19 Now, before 23 April 2014, Mr Blades, had you seen
 20 this certificate?
 21 A. I will have done, yes.
 22 Q. You would have done. How often would you have seen it,
 23 do you think, or looked at it?
 24 A. Once, maybe twice.
 25 Q. We can see that it was issued in January 2008, if you

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1 look at the large blue box towards the bottom of the
 2 page.
 3 Do you remember when you first looked at it, of the
 4 once or twice?
 5 A. No, I don't recall.
 6 Q. Did you look at it when it was first issued?
 7 A. I can't say. I don't recall.
 8 Q. Do you recall a grand discussion about this certificate,
 9 particularly involving Ray Bailey at Harley --
 10 A. No.
 11 Q. -- in general terms?
 12 A. No.
 13 Q. Ever?
 14 A. I don't recall one.
 15 Q. Right.
 16 You say you had seen it once or twice; were you
 17 familiar with it? Were you familiar with its terms?
 18 A. I hadn't read it in great depth, to be honest.
 19 Q. Right.
 20 When you received it from Debbie French on
 21 23 April 2014, did you read it again?
 22 A. No.
 23 Q. Did you open the attachment even?
 24 A. Possibly. It was obviously a request for documents.
 25 I think it came from Rydon's to Harleys, and Harleys to

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1 Arconic.
 2 Q. Right.
 3 A. So I was being copied in, and I took it it was --
 4 I would have taken it as it was something that was being
 5 asked for, for Rydon's files.
 6 Q. Do you know whether CEP had ever had any input into the
 7 technical content of this BBA certification?
 8 A. No.
 9 Q. Were you or anybody else to your knowledge at CEP aware
 10 of any testing that supported the claims in this
 11 certificate?
 12 A. No.
 13 Q. What did you understand at the time the BBA certificate
 14 covered?
 15 A. It covered various aspects, fixing, colour of the
 16 product.
 17 Q. Let me be more specific. Did you understand that it
 18 covered the sheet, the Reynobond ACM sheet that came to
 19 your factory for fabrication, or did it cover the
 20 product as fabricated as it left your factory, or both?
 21 A. It would have -- well, I -- we would have taken it as it
 22 covered the product as it came into the factory in
 23 a sheet --
 24 Q. Yes.
 25 A. -- in a 4-mil sheet, and it would also still cover the

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1 product as it left the factory.
 2 Q. Were you ever concerned that the fabrication process
 3 itself might undermine the certification by the BBA of
 4 the sheet as it left the Reynobond factory?
 5 A. No.
 6 Q. No.
 7 Can I ask you to look, please, at {CEP00053378}.
 8 This is a document published by Reynobond called a
 9 "Fabrication guideline, Step by step to a perfect
 10 cladding, Dedicated to your success". It's dated, you
 11 can't see it here, 19 July 2010.
 12 Are you familiar with this document?
 13 A. I don't believe I am. It doesn't spring to my mind.
 14 Q. Can you explain why that is?
 15 A. No.
 16 Q. You are CEP, for present purposes, a fabricator of these
 17 panels. Is this not a document that was familiar to
 18 you?
 19 A. Not to me personally.
 20 Q. Do you know whether it was in the CEP office in
 21 St Helen's and regularly read by those on the shop
 22 floor, even if you weren't familiar with it?
 23 A. I couldn't say. I couldn't say.
 24 Q. Let's see how we go with it.
 25 Can you please go to page 12 {CEP00053378/12}. This

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1 is about machining. On the right-hand side, it says:
 2 "Preparation for machining calculation of design
 3 dimensions.
 4 "Closed 90° fold - milling cutter with 3 mm flat
 5 surface. When milling for a fold, a thickness of 0.3 mm
 6 of polyethylene should be left in the bottom of the
 7 groove, on top of the thickness of the aluminium (see
 8 procedure in the Milling chapter).
 9 "For a fold milled with a cutter with a flat surface
 10 of 3 mm, the fold axis will be in the middle of the
 11 milled groove flat, therefore 0.8 mm from the visible
 12 face. This, in the case of a closed 90° fold leads to
 13 an oversize of 0.8 mm per angle.
 14 "In practise, we round this off to 1 mm for ease of
 15 calculation. When making a closed fold with a milling
 16 cutter with a 3 mm flat surface, the exterior of the
 17 finished dimension is increased by about 1mm."
 18 Now, that's more or less comprehensible to a layman.
 19 Just in terms of what it's telling you, is it
 20 telling you that you need to cut through one sheet of
 21 aluminium and most of the way through the polyethylene
 22 core, leaving only about 0.3 millimetres of core
 23 remaining?
 24 A. I believe that is the case here.
 25 Q. Yes.

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1 A. I wasn't involved in the fabrication side of the
 2 business.
 3 Q. No, and I'm asking you really to comment on this
 4 document --
 5 A. That sounds reasonable in what I've seen and am aware of
 6 when you fold a panel.
 7 Q. Yes. Did you understand that this exposed all of the
 8 inside of the core, the polyethylene in this case, apart
 9 from the remaining 0.3 millimetres?
 10 A. I would have been aware, but I wasn't particularly aware
 11 of it because I didn't get involved in that, but seeing
 12 this document here now, I can see what you're saying,
 13 but I wasn't involved in the factory side of things, so
 14 I wouldn't take notice of that.
 15 Q. In general terms, though, were you aware that when
 16 a flat sheet was fabricated by cutting into a cassette,
 17 portions of the PE core would be exposed?
 18 A. Yes, I would have been aware of that by --
 19 Q. Did it cross your mind that that would present a fire
 20 risk or fire hazard?
 21 A. No.
 22 Q. It didn't? Did you ever bring to the attention of
 23 Studio E or Harley or Rydon or anyone you were dealing
 24 with on the Grenfell project the fact that milling
 25 a flat sheet and exposing the PE core would present

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1 a fire risk?
 2 A. No.
 3 Q. Can we go to the evidence of Mr Wehrle of Arconic. This
 4 is {MET00053190/20}. I would like to look with you,
 5 please, at paragraph 68. He says there:
 6 "On 7 November 2013, the CSTB [that's the French
 7 testing body] informed Philippe [that's
 8 Philippe Vonthron, who was a colleague of Mr Wehrle's]
 9 that the first SBI tests had been completed on the
 10 samples sent and that the rivet sample had indicated
 11 behaviour equivalent to a C classification (on the one
 12 sample) and that the test on the cassette sample had
 13 been stopped due to a flash-over so the best achievable
 14 classification for that variant would be an E (using an
 15 ignitability test)."
 16 Stopping there, it looks from that that the cassette
 17 fix is or was significantly more combustible than
 18 a rivet fix. Did you know that?
 19 A. No.
 20 Q. Did anybody at Arconic ever discuss the fire performance
 21 differences between a cassette fix of this product and
 22 a face fix or riveted?
 23 A. No, not to my knowledge.
 24 Q. Did anybody at Arconic ever tell you about the results
 25 of the European classification testing done at CSTB on

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1 Reynobond ACM in different configurations?
 2 A. Not to my knowledge, no.
 3 Q. Do you know that cassette had also failed combustibility
 4 tests in 2004?
 5 A. No.
 6 Q. And did you know that in 2013 it had obtained an E under
 7 the Euro classification systems?
 8 A. No.
 9 Q. Are you surprised to hear any of that?
 10 A. I am, yes. I'm surprised that they didn't make us aware
 11 of it.
 12 Q. What would you have done had they made you aware of it?
 13 A. Obviously we would have acted differently.
 14 Q. What would you have done?
 15 A. I'm not sure, I can't recall, because I don't get
 16 involved in the manufacturing side of it, but I'm sure
 17 that somebody in CEP would have addressed the situation
 18 with Arconic as to how to overcome that problem.
 19 Q. Right.
 20 What I'm going to do next is to take a closer look
 21 at the certificate and see how much you can tell us
 22 about it, but I take on board the fact that you were
 23 only vaguely familiar with it. Is that a fair
 24 description of your overall --
 25 A. It is, yes.

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1 Q. So I can probably take it a bit more quickly.
 2 A. Yes.
 3 MR MILLETT: With that in mind, that may be a convenient
 4 moment.
 5 SIR MARTIN MOORE-BICK: Yes. I think at that point we shall
 6 have a break, Mr Blades.
 7 THE WITNESS: Okay.
 8 SIR MARTIN MOORE-BICK: We will come back at 3.40, please,
 9 and while you're out of the room, please don't talk
 10 about your evidence or anything to do with it.
 11 THE WITNESS: Thank you.
 12 SIR MARTIN MOORE-BICK: All right? Thank you very much.
 13 (Pause)
 14 3.40, please. Thank you.
 15 (3.23 pm)
 16 (A short break)
 17 (3.40 pm)
 18 SIR MARTIN MOORE-BICK: All right, Mr Blades?
 19 THE WITNESS: Yes, thank you.
 20 SIR MARTIN MOORE-BICK: Ready to keep going?
 21 THE WITNESS: Yes.
 22 SIR MARTIN MOORE-BICK: Yes, Mr Millett.
 23 MR MILLETT: Thank you, Mr Chairman.
 24 Mr Blades, can I then take you back to the
 25 BBA certificate for this product, the Reynobond PE 55

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1 ACM panels, at {CEP000000282}, please.
 2 On the front page we can see, under "Key factors
 3 assessed", the third entry down, "Behaviour in relation
 4 to fire", and it says:
 5 "In relation to the Building Regulations for
 6 reaction to fire, the panels may be regarded as having
 7 a Class 0 surface in England and Wales, and a 'low risk'
 8 material in Scotland (see section 6)."
 9 When you first and perhaps second time read this
 10 certificate, did you note that? Did you note those
 11 words?
 12 A. Yes, possibly.
 13 Q. If we can look at page 2 {CEP000000282/2} of the
 14 certificate, at the top, under the header
 15 "Building Regulations 2000", as they then were, under
 16 requirement B4(1), you see it says:
 17 "The panels are judged to meet the Class 0
 18 requirements. See sections 6.1 to 6.6 of this
 19 Certificate."
 20 Do you see that?
 21 A. Yes.
 22 Q. Did you note that at the time?
 23 A. Possibly.
 24 Q. If we go to section 6 of the certificate, we can see
 25 under 6.1 -- this is at page 5 {CEP000000282/5} -- this

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1 is under the whole heading "Behaviour in relation to
 2 fire":
 3 "A standard sample of the product, with a grey/green
 4 Duragloss 5000 coating, when tested for reaction to
 5 fire, achieved a classification of B-s2, d0 in
 6 accordance with EN 13501-1:2002. A fire retardant
 7 sample of the product, with a gold-coloured Duragloss
 8 finish, when tested for reaction to fire, achieved a
 9 classification B-s1, d0 in accordance with
 10 EN 13501:2002."
 11 Then under 6.2:
 12 "A fire retardant sample of the product, with a
 13 metallic grey PVDF finish, when tested in accordance
 14 with BS 476-6 ... achieved a fire propagation index (1)
 15 of 0 and, when tested in accordance with BS 476-7 ...
 16 achieved a Class 1 surface spread of flame."
 17 Just pausing there, did you ever read that part of
 18 the certificate, do you think?
 19 A. I don't recall, but I would say I've probably skimmed
 20 through it.
 21 Q. Right.
 22 In 2014, would you have known or understood what
 23 those results meant?
 24 A. No.
 25 Q. Reading this now, can you see that FR has a different

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1 result in fire performance from the standard sample?
 2 A. Yes.
 3 Q. In fact it's only the fire retardant sample that was
 4 tested in accordance with BS 476-6 and 7, not the
 5 standard sample?
 6 A. Yes.
 7 Q. Am I right that you assumed at the time -- this is
 8 really any time from 2012 to 2015 -- that all of these
 9 panels, all Reynobond panels the subject of this
 10 certificate, were class 0, whether they were fire
 11 retardant or standard?
 12 A. Yes.
 13 Q. Do you see now that that's not actually what the detail
 14 of the certificate --
 15 A. I can see that now, yes.
 16 Q. Is that a surprise to you, to see that?
 17 A. Yes.
 18 Q. I should just show you for fairness' sake section 6.3:
 19 "As a consequence of sections 6.1 and 6. 2, the
 20 products may be regarded as having a Class 0 surface in
 21 relation to the Approved Document B ..."
 22 Did you understand at the time the basis on which,
 23 even though a class 0 test had not been undertaken in
 24 relation to the standard sample, nonetheless a standard
 25 sample could be regarded as having a class 0 surface?

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1 A. Yes. My understanding, as I believe CEP's understanding
 2 was, was that the Reynobond products and ones that we'd
 3 used had a class 0 fire rating.
 4 Q. Had a class 0 fire rating?
 5 A. Yeah.
 6 Q. But they hadn't been tested to class 0, but they should
 7 be regarded as class 0?
 8 A. Yeah.
 9 Q. Is that what you understood?
 10 A. That's what we understood, yes.
 11 Q. So you understood that they hadn't actually been tested
 12 to class 0?
 13 A. I wasn't aware they hadn't been tested to it, no.
 14 Q. I follow.
 15 Can we then look at section 6.4:
 16 "These performances may not be achieved by other
 17 colours of the product and the designations of a
 18 particular colour should be confirmed by:
 19 "England and Wales - Test or assessment in
 20 accordance with Approved Document B, Appendix A,
 21 Clause 1."
 22 It's right, I think, that the BBA certificate, at
 23 the time it was supplied in April 2014, it was Reynobond
 24 champagne and smoke silver that were under
 25 consideration.

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1 A. Yes.
 2 Q. Now, they're not colours mentioned anywhere in this
 3 certificate, are they?
 4 A. I can see not, no.
 5 Q. Did it occur to you at the time that the colours being
 6 considered for the tower, namely champagne and smoke
 7 silver, were not covered by this certificate?
 8 A. No.
 9 Q. Why is that?
 10 A. I would have taken it, and I'll say that CEP would have
 11 taken it, that all the colours would have been covered
 12 by the same certificate.
 13 Q. But it tells you in terms that these performances --
 14 these are fire classification performances -- may not be
 15 achieved by other colours of the product and that
 16 designations of colour should be confirmed by a test or
 17 assessment under Approved Document B. Did you not know
 18 that?
 19 A. No.
 20 Q. If you had read the certificate, you would have known
 21 it, wouldn't you?
 22 A. Yes, but I couldn't imagine that Reynobond would test
 23 every colour to this -- to test every colour would be,
 24 you know, a vast amount of testing to do, plus the fact
 25 I believe that them and other ACMs, they can provide

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1 specific colours at customer requests. The view would
 2 have been that the Reynobond product in any colour would
 3 be in line with this -- with the class 0 or the --
 4 regarded as having class 0.
 5 Q. So when you read 6.4, what did you think it meant?
 6 A. Well, having read it now, the way it reads is that it's
 7 only the colours. You'd have to get confirmation
 8 that -- any other colour than what they have highlighted
 9 in the BBA would have to be confirmed by Reynobond as to
 10 their performance.
 11 Q. Yes. You say having read it now, and now you're reading
 12 what it says, but at the time when you first read this,
 13 what did you think it meant?
 14 A. I don't recall reading it in great depth to pick out
 15 that --
 16 Q. Right.
 17 A. -- point 6.4.
 18 Q. Can I ask you to look at the transcript of Ray Bailey's
 19 evidence. He was asked about this exact topic.
 20 {Day33/45:10-25}, please, and then down to
 21 {Day33/46:11}.
 22 At page 45, line 10, he was shown this passage in
 23 the certificate, and he is asked at line 10:
 24 "Question: Did you consider whether the finish that
 25 was on the product may have made a difference to its

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1 classification?
 2 "Answer: It's strange. It was a question that
 3 I asked at the time --
 4 "Question: Who did you ask?
 5 "Answer: -- believe it or not. I can't recall who
 6 I asked, whether it was Reynobond direct or through CEP,
 7 and if it was through CEP it would probably have been
 8 Roy Fewster, and the reason for the question was the
 9 delamination we were having with the Etalbond, and it
 10 was suggested that the paint on that may have had
 11 something to do with the delamination. So when I saw
 12 grey/green, I thought: does this only apply to this
 13 certificate? And I was told that, no, it's on the
 14 certificate because that's the colour that was tested
 15 and it has to go on there. And does it apply to
 16 everything else? Well, yes, otherwise there would be
 17 200 of these certificates, one for each colour that they
 18 sell.
 19 "Question: So that was the answer: you were told it
 20 would make no difference?
 21 "Answer: Yes.
 22 "Question: Who was it who told you that?
 23 "Answer: I believe that came back through
 24 Roy Fewster, although it's a long time, I can't remember
 25 who it was, but I think that's the route that it came

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1 back through.”
 2 Were you aware of any conversation at any time
 3 between Ray Bailey and Roy Fewster or anybody else at
 4 CEP about clause 6.4 of the BBA certificate and it only
 5 applying to the particular colours?
 6 A. No.
 7 Q. Can you comment on Ray Bailey’s recollection about such
 8 a conversation?
 9 A. Other than if it was -- I’m not aware of him having
 10 a conversation with anybody at CEP. Obviously the name
 11 in there isn’t my name, so I didn’t have a conversation
 12 with him. Whether he’s had a conversation with
 13 Reynobond and not Mr Fewster, I couldn’t answer.
 14 I don’t know.
 15 Q. Did you ever ask to see any test evidence, fire test
 16 evidence, for colours of Reynobond panels that were
 17 being considered other than those set out in the
 18 certificate?
 19 A. No.
 20 Q. Did you ever have a conversation with anybody about the
 21 reason why you needed to obtain particular test evidence
 22 for particular colours other than those set out in the
 23 certificate?
 24 A. No.
 25 Q. Was it your practice at the time -- in other words,

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1 between 2012 or even before 2012 -- to use or send out
 2 the BBA certificate in relation to colours of panels
 3 that you were fabricating which were not the colours
 4 referred to in the BBA certificate?
 5 A. No.
 6 Q. So you didn’t send the BBA certificate?
 7 A. Only if we were requested it.
 8 Q. Do you remember an occasion when you sent
 9 a BBA certificate out in relation to a fabricated panel
 10 of a colour different from the colour set out in the
 11 certificate?
 12 A. No, I don’t.
 13 Q. You don’t.
 14 Can we then turn to a different topic, which is the
 15 2015 Reynobond order which you got from Harley.
 16 Can we start with {CEP000000512}, please. This is
 17 an email from Mark Stapley of 25 February to you
 18 attaching ACM panel requirements for Grenfell Tower:
 19 “Hi Geof,
 20 “Please find attached our cladding panels
 21 requirements for Grenfell Tower. Please can you provide
 22 us with your most competitive price and also confirm
 23 lead times.”
 24 Do you know why it took Harley so long to place this
 25 order, given that you appear to have secured the project

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1 back in June 2014?
 2 A. I don’t, no.
 3 Q. Let’s look at the attachment. It’s {CEP000000513}.
 4 This is Harley’s order for your supply.
 5 I think we may have got the wrong reference there.
 6 Can we go on to page -- I’m sorry, it’s my fault.
 7 {CEP000000512}, please. We want the attachment for
 8 that, which at the moment I’m struggling to find.
 9 Do you remember that the specification was Reynobond
 10 and the finish was smoke silver metallic Duragloss 5000
 11 satin?
 12 A. I don’t recall what the colour was, but if that’s what
 13 was on the order, then --
 14 Q. Right. And there was never any specification as to
 15 whether it should be PE or FR?
 16 A. Not that I’m aware of, no.
 17 Q. Okay, then let’s go to the quotation.
 18 On 6 March 2015, do you remember that CEP sent
 19 quotations with a final revised quotation on 13 March
 20 for the supply of the ACM panels? Do you remember that?
 21 A. I am aware -- vaguely, yes. I didn’t -- I don’t believe
 22 I sent the email, but I could stand corrected.
 23 Q. By that stage, the request for the quotation and the
 24 quotation is PE, no reference to FR at all. Yes?
 25 A. Yes.

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1 Q. Yes.
 2 If you go to {CEP000000528}, you can see that
 3 Ben Bailey accepts your quotation. This is the email of
 4 13 March 2015, and he sends an email to Rob Maxwell,
 5 Mark Stapley and you. It goes to Neil Wilson at CEP:
 6 “Neil,
 7 “Please find our purchase order to cover the items
 8 below.
 9 “I will be sending over a delivery schedule
 10 shortly ...”
 11 You can see the email to which he is responding
 12 below that where Neil Wilson confirms to Mark Stapley,
 13 copied to Roy Fewster and you, the revised price of the
 14 supply and fabrication of the ACM panels to the above
 15 project, and you can see that they’re the smoke silver
 16 panels as detailed; you see that?
 17 A. Yes.
 18 Q. Now, it looks as if the price that was quoted there or
 19 confirmed there is around £300,000; do you see that?
 20 A. Yes.
 21 Q. Now, let’s go to {CEP000000528/2}, please. You can see
 22 that this had come from Neil Wilson.
 23 Do you remember, now I’ve shown you the entire email
 24 run, whether Mark Stapley had asked for a discount from
 25 Neil Wilson?

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1 A. I don't, no.
 2 Q. You don't know. Do you think they got a discount?
 3 A. I honestly don't know.
 4 Q. Do you remember that the price that CEP had originally
 5 quoted, as I think we saw from the 21 January 2014
 6 letter I showed you earlier to Mike Albiston, was
 7 £525,394?
 8 A. Yes, correct.
 9 Q. Yes. But we now see from this email -- perhaps we
 10 should just go back to the bottom of page 1
 11 {CEP000000528/1} -- that the price CEP ended up charging
 12 was about £300,000? Do you remember that? We can see
 13 it.
 14 A. I can see it, correct, yes.
 15 Q. Can you explain why CEP was prepared to drop its quoted
 16 price by over 40%?
 17 A. The quotation back in January 2014 for the rainscreen,
 18 that included, if I remember correctly from earlier,
 19 that included insulation, fire barriers, rails. I can't
 20 just recall exactly what was -- but it was what I would
 21 have classed as a full system. This price is purely for
 22 a fabricated panel.
 23 Q. I follow.
 24 When did the spec, the CEP spec, if you like, change
 25 between the quotation for the full system, at least

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1 including rails and fixings, to simply the supply of the
 2 fabricated panels?
 3 A. When Harley sent the enquiry through for the request
 4 just for the panels.
 5 Q. I see, so March 2015?
 6 A. Yes.
 7 Q. I see.
 8 In the last paragraph of Mr Wilson's email he says:
 9 "I also confirm we will supply the remainder of the
 10 panels (yet to be finalised) ..."
 11 What was to be finalised?
 12 A. I don't know, I'm not aware. It could have been they
 13 hadn't designed a certain element of the building.
 14 Q. I see. I was going to ask you: was it design or was it
 15 simply quantities?
 16 A. It could have been either, you know, I don't recall what
 17 that bit was.
 18 Q. Then turning to the supply itself, it's right, I think,
 19 that CEP supplied the cladding under a separate contract
 20 from the contract under which it supplied the glazed
 21 window elements, didn't it?
 22 A. I believe it was two separate orders, yes.
 23 Q. The supply of the rainscreen was 2015 and again into
 24 2016, in terms of the purchase and delivery.
 25 A. Right. I --

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1 Q. Are you familiar with the dates?
 2 A. I don't know what was in 2016.
 3 Q. Right. Well, what do you recall of the dates of
 4 delivery?
 5 A. I wasn't particularly involved in the delivery.
 6 Q. You weren't, all right.
 7 A. So what went out -- once the programme started to
 8 deliver panels, the programme went out from the factory
 9 in line with their delivery requirements, and as to what
 10 they were --
 11 Q. I see.
 12 A. -- I wasn't involved.
 13 Q. Right.
 14 Do you remember that in about April 2015 Arconic
 15 advised that the core of the Reynobond ACM cladding
 16 would be black as opposed to translucent?
 17 A. No.
 18 Q. You don't know anything about that?
 19 A. No.
 20 MR MILLETT: Right. I see. So I don't need to ask any
 21 further questions about that.
 22 Well, Mr Blades, I've covered a lot of ground with
 23 you today and I've come to the end of my questions that
 24 I've got prepared for you. It's normally the process
 25 that I then look back at my notes and see if there are

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1 any further questions or take them from elsewhere
 2 outside this room.
 3 THE WITNESS: Okay.
 4 MR MILLETT: So I am going to ask the Chairman to break for
 5 the moment and come back again shortly.
 6 THE WITNESS: Okay.
 7 SIR MARTIN MOORE-BICK: Do you have any idea how long you
 8 might need?
 9 MR MILLETT: Maybe 10 minutes.
 10 SIR MARTIN MOORE-BICK: Shall we say 15?
 11 MR MILLETT: We'll say 15 to be on the safe side, very
 12 generous.
 13 SIR MARTIN MOORE-BICK: Well, Mr Blades, as Mr Millett has
 14 explained, he needs a moment just to check that he has
 15 covered all the ground, and there are other people
 16 watching very intently who may have other questions they
 17 want to suggest should be put to you.
 18 So we are going to break now until 4.15, and then we
 19 will see whether there are any more questions. I hope
 20 not too many.
 21 THE WITNESS: Thank you.
 22 SIR MARTIN MOORE-BICK: So you go with the usher, and no
 23 talking to anyone about your evidence while you're out
 24 of the room. All right?
 25 THE WITNESS: Okay.

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1 SIR MARTIN MOORE-BICK: Thank you very much.
 2 (Pause)
 3 Right, 4.15, then, please. Thank you.
 4 (4.02 pm)
 5 (A short break)
 6 (4.15 pm)
 7 SIR MARTIN MOORE-BICK: Right, Mr Blades, we will see if
 8 Mr Millett has any further questions for you.
 9 THE WITNESS: Okay, thank you.
 10 SIR MARTIN MOORE-BICK: Yes, Mr Millett.
 11 MR MILLETT: Mr Chairman, thank you.
 12 Just the one, Mr Blades, and it is this: we have
 13 gone through a lot of evidence today and a lot of
 14 questions and answers about the project and your role in
 15 it.
 16 Looking back on it now, would you have done anything
 17 differently on the project, knowing what you now know?
 18 A. Yes, I think the company would and I would as well, yes.
 19 I think we'd have looked more deeply into the documents
 20 that were made available.
 21 Q. What documents?
 22 A. The BBA certificate in particular, probably enquired
 23 more as to what, you know, other products that was
 24 associated with a rainscreen system did and how it
 25 affected the panel or not in that case, yes.

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1 MR MILLETT: Thank you very much.
 2 Mr Chairman, I have no further questions.
 3 Mr Blades, it only remains for me to say thank you
 4 to you for coming to the Inquiry today and assisting us
 5 with our investigations. We are extremely grateful.
 6 THE WITNESS: Thank you.
 7 SIR MARTIN MOORE-BICK: I would add my thanks to those of
 8 Mr Millett. It has been very good of you to come to the
 9 Inquiry, thank you for doing so. I know it's been quite
 10 a long journey for you, hasn't it, to come down?
 11 THE WITNESS: Yes.
 12 SIR MARTIN MOORE-BICK: But at least you are going to be
 13 able to get home, I think, without too much difficulty
 14 this afternoon.
 15 THE WITNESS: Fingers crossed, yes.
 16 SIR MARTIN MOORE-BICK: Thank you very much for coming, it
 17 has been very helpful to have your evidence, and you are
 18 now free to go.
 19 THE WITNESS: Thank you very much.
 20 (The witness withdrew)
 21 SIR MARTIN MOORE-BICK: Thank you, Mr Millett.
 22 Now, that's presumably it for the day?
 23 MR MILLETT: That is it for the day, and tomorrow we have
 24 another witness, Mr McQuatt, whom Ms Grange will be
 25 examining.

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1 SIR MARTIN MOORE-BICK: Thank you very much.
 2 10 o'clock tomorrow, then, please. Thank you.
 3 (4.18 pm)
 4 (The hearing adjourned until 10 am
 5 on Thursday, 24 September 2020)
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