

OPUS2

Grenfell Tower Inquiry

Day 296

June 29, 2022

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1 Wednesday, 29 June 2022
 2 (10.00 am)
 3 SIR MARTIN MOORE–BICK: Good morning, everyone. Welcome to
 4 today’s hearing. Today we’re going to hear evidence
 5 from Professor David Purser, the expert toxicologist
 6 instructed by the Inquiry.
 7 Yes, Mr Millett.
 8 MR MILLETT: Yes, Mr Chairman, good morning to you. Good
 9 morning, members of the panel.
 10 Before I call Professor Purser, I just want to
 11 mention this: he’s a toxicologist. He has analysed the
 12 relevant evidence which relates to the deceased on the
 13 night at Grenfell Tower. You will recall that he
 14 provided a Phase 1 report. He has now provided a report
 15 for this phase, his Phase 2 report. His evidence does
 16 contain descriptions of facts and matters about the
 17 deceased’s last movements and the immediate causes of
 18 death, which many will find distressing. I wanted to
 19 raise that at this stage so that those who are following
 20 these proceedings, both in person here in the hearing
 21 room and on the live stream, are aware of the contents
 22 of his evidence in general terms, and then they can
 23 choose whether they listen and follow or not.
 24 SIR MARTIN MOORE–BICK: Yes.
 25 MR MILLETT: So this is a trigger warning.

1

1 SIR MARTIN MOORE–BICK: Thank you very much.
 2 MR MILLETT: Can I now call Professor Purser, please.
 3 SIR MARTIN MOORE–BICK: Thank you.
 4 PROFESSOR DAVID PURSER (sworn)
 5 SIR MARTIN MOORE–BICK: Thank you very much indeed. Now,
 6 please sit down and make yourself comfortable.
 7 (Pause)
 8 THE WITNESS: Thank you.
 9 SIR MARTIN MOORE–BICK: Yes?
 10 Yes, Mr Millett.
 11 Questions from COUNSEL TO THE INQUIRY
 12 MR MILLETT: Thank you, Mr Chairman.
 13 Professor Purser, good morning.
 14 A. Morning.
 15 Q. You are Professor David Purser CBE?
 16 A. That’s correct, yes.
 17 Q. Can I ask you, please, before we start your evidence,
 18 that when giving evidence, if you could keep your voice
 19 up, so that the person who sits to your immediate right
 20 there typing away can get down everything on the
 21 transcript clearly. Also, please don’t shake your head
 22 or nod your head; you have to say “No” or “Yes” as the
 23 case may be.
 24 We will take breaks in the normal way at about 11.15
 25 or 11.20 or so during this morning and at an equivalent

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1 midway point during this afternoon.
 2 Finally, if there’s anything in the questions that
 3 I’m asking you which are unclear or you would like me to
 4 repeat or put a different way, or there’s parts of your
 5 report you would like me to show you, then we can do
 6 that.
 7 A. I understand, yes.
 8 Q. All right?
 9 A. Should there be a screen display — oh, here it is.
 10 Q. The screen is in front of you, yes.
 11 A. Yes, okay.
 12 Q. Everything that I’m going to show you will appear on the
 13 screen in front of you, and we can take it as quickly or
 14 as slowly as you like.
 15 Now, first, can you confirm that you provided
 16 a preliminary Phase 1 report to the Inquiry dated
 17 5 November 2018?
 18 A. Yes.
 19 Q. Can you confirm that that report — and I’ll just give
 20 the reference, {DAPR0000001} — was the subject of your
 21 evidence at Phase 1 of this Inquiry?
 22 A. It was, yes.
 23 Q. And that you were asked questions about that on Day 84
 24 of the Phase 1 hearings; yes?
 25 A. Yes.

3

1 Q. And the transcript reference for that if we need it is
 2 {INQ00015183}.
 3 You have now provided a final report entitled your
 4 Phase 2 report, I think, haven’t you?
 5 A. Yes, I have.
 6 Q. Is it right that’s now in three parts? And I’ll just
 7 read those into the record.
 8 A. Yes.
 9 Q. Sections 1 to 4 are at {DAPR0000005}, section 5 is at
 10 {DAPR0000011}, and section 6 is at {DAPR0000006}.
 11 A. Yes.
 12 Q. Yes.
 13 Now, I’m going to ask you some detailed questions
 14 about that shortly, but is it right to say that your
 15 Phase 2 work builds upon the preliminary conclusions you
 16 reached in your Phase 1 report?
 17 A. Yes, it’s a continuation, basically.
 18 Q. Yes.
 19 Can we go, then, to {DAPR0000005/17}. You can see
 20 there a summary of your instructions at paragraph 1
 21 and 2. Paragraph 1 says:
 22 “I have been asked to provide reports, for the
 23 purposes of Phases 1 & 2 of the Inquiry, which address
 24 the following issues:
 25 “(1) The production of toxic gases in domestic fires

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1 and the consequences of inhaling toxic gases in such
 2 circumstances, both physiological and behavioural;
 3 "(2) The toxicity when exposed to fire of certain
 4 materials which were present at Grenfell Tower;
 5 "(3) Any recommendations arising from points (1) to
 6 (2) above, including as to any further testing which
 7 ought to be carried out which is relevant to these
 8 issues."
 9 Then at paragraph 2 you say:
 10 "I was asked to provide a report for Phase 1 ..."
 11 And you explain what that was there.
 12 Can you confirm that you have updated and expanded
 13 on your preliminary conclusions where necessary in this
 14 Phase 2 report?
 15 A. Yes, I have, yes.
 16 Q. Is it also right that, as you say at paragraph 4 here,
 17 if you look down at that towards the foot of the screen,
 18 now in the middle of your screen, that you have
 19 addressed:
 20 "... how each of the 71 persons who died were
 21 prevented from escaping, how they were overcome and the
 22 causes of their deaths."
 23 That's what you have done, in essence.
 24 A. Yes, I wanted to address each individual named person.
 25 Q. Yes.

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1 Now, just to explain, is it right that the number,
 2 71, is the number of persons who died on or about the
 3 night of 14 June 2017 and do not include Pily Burton,
 4 who died some months later?
 5 A. That's correct.
 6 Q. Right.
 7 If we turn to the bottom of page 3 {DAPR000005/3},
 8 please, in this document, we can see a signature on the
 9 report dated 10 May 2022. Is that your signature?
 10 A. It is indeed, yes.
 11 Q. Have you read this report recently?
 12 A. Yes.
 13 Q. Can you confirm that the statements of fact that you
 14 have made in it are true to the best of your knowledge
 15 and belief?
 16 A. Yes, they are, yes.
 17 Q. Can you also confirm that the opinions that you have
 18 expressed in this report represent your true and
 19 professionally held opinions?
 20 A. They do, yes.
 21 Q. Can you also confirm that you have provided this report
 22 in the same way as you would have done to a court?
 23 A. Yes.
 24 Q. Thank you.
 25 Now, you have also provided two further documents to

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1 the Inquiry recently, which have been disclosed to core
 2 participants, and I'm going to show you those and ask
 3 you about them.
 4 The first is {DAPR0000012}, if we could please have
 5 that. That is entitled:
 6 "Summary of approximate fire arrival and occupant
 7 flat exit times and outcomes from detailed accounts in
 8 Section 6 floor by floor analysis."
 9 First, can you confirm that you prepared this
 10 document?
 11 A. I did, yes.
 12 Q. This is a document which serves, does it, as
 13 an aide memoire for your analysis and your conclusions
 14 in the Phase 2 report?
 15 A. Exactly. I thought it would be helpful as, if you like,
 16 a quick reference to what was happening on each floor at
 17 each time, that we could refer to if necessary.
 18 Q. Thank you. Can you explain in short terms what it
 19 shows?
 20 A. Yes. So as you can see there, you've got each floor
 21 there, and the document is set out in six pages. Each
 22 page is for one column of flats. So the page you put up
 23 is all the flats — it refers to all the flats 6 on the
 24 east side of the tower from the 23rd floor down to the
 25 4th. There's an approximate estimate of the time that

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1 the fire arrived outside each of those flats,
 2 approximate time that the occupants left the flat, if
 3 they did so, and then the final column is just a brief
 4 summary for me of who was in those flats. Where they're
 5 outlined in red, those are people who died during the
 6 incident. The others are those that evacuated
 7 successfully. So it's just a quick reference guide,
 8 really.
 9 Q. Yes.
 10 A. The detail behind all this is in section 6 of my report.
 11 Q. Yes, thank you. Can you confirm that there's nothing
 12 new in that document and that it is simply a summary of
 13 the more detailed data found in your report?
 14 A. Yes.
 15 Q. Thank you.
 16 Again, the statements of fact set out in this
 17 document are true to the best of your knowledge and
 18 belief?
 19 A. They are, yes.
 20 Q. Thank you.
 21 The second document is at {DAPR0000013}, please.
 22 That is entitled, "Summary table of toxicity endpoints
 23 in each 23rd floor flat". Did you prepare this document
 24 as well?
 25 A. I did, yes.

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1 Q. What does it show?
 2 A. Just scroll down to the table.
 3 Q. Yes, can we go to the foot of the page.
 4 A. Yes, so this was something I did prepare initially
 5 a while ago, but I felt it was quite important to
 6 demonstrate the issue of: what was the latest time that
 7 occupants of different flats around the tower, ie flat 6
 8 to flat 1 at each level, the latest time they could have
 9 left their flat and still succeeded or had a good chance
 10 of succeeding in descending the stair without being
 11 overcome in the stair on the way down. So it's a kind
 12 of last time that you might reasonably be expected to
 13 have self-evacuated, had you had the opportunity to do
 14 so.
 15 I prepared this originally just for the top floor.
 16 I started at the top and worked down, because most
 17 deaths were at the top of the tower. And these times,
 18 they're very approximate, but they give a picture, if
 19 you like, of that situation.
 20 The caveat is that, as you go down the tower,
 21 there's a slight lag in the way the fire went round the
 22 tower, so these times would be increased by a few
 23 minutes on the lower floors. But they're quite close to
 24 these times for the upper half of the tower.
 25 Q. Yes, thank you.

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1 A. We can come back to this in discussion later if
 2 necessary.
 3 Q. Yes, thank you.
 4 Can you also confirm that there's nothing new in
 5 this document and that it's simply a summary of the data
 6 contained elsewhere in your report?
 7 A. Yes, it's a summary of the data in the report, yes.
 8 Q. Again, it would follow, would it, that you can confirm
 9 that the statements of fact set out in it are true to
 10 the best of your knowledge and belief?
 11 A. Yes.
 12 Q. And, similarly, the opinions expressed in it are your --
 13 A. Yes.
 14 Q. -- properly and professionally held opinions?
 15 A. They are, yes.
 16 Q. Can we then turn to your qualifications and expertise.
 17 You have set out your background and expertise
 18 relevant to the matters we are investigating here at
 19 this Inquiry at appendix D. Can we go to that, please.
 20 That's {DAPR0000010}. There it is. I'm not going to go
 21 through all that today with you.
 22 First, can you confirm that you have reviewed and
 23 updated this CV --
 24 A. I have, yes.
 25 Q. -- for the purposes of this report?

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1 A. Sorry. Yes, I have, yes.
 2 Q. Just picking out some key points. First, you have a PhD
 3 in neurophysiology from the University of Birmingham.
 4 A. Yes.
 5 Q. And a DipRCPPath in 1984 from the Royal College of
 6 Pathologists.
 7 A. Yes.
 8 Q. I think as you say in your second report, which we'll
 9 come back to, you are a diplomate member of the
 10 Royal College of Pathologists.
 11 A. Yes.
 12 Q. Yes.
 13 A. That's correct.
 14 Q. Yes. Was that from 1984 or was that more recently?
 15 A. No, that's continuous from 1984, yes.
 16 Q. Right. What does diplomate member of the RCP mean?
 17 A. Well, there's a qualification that is usually obtained
 18 by clinical medic pathologists that become members,
 19 MRCPPath. I'm not an MRCPPath. The College of
 20 Pathologists offered the opportunity for toxicologists
 21 to obtain a diploma in toxicology, which I took in 1984,
 22 and then you become a member of the college. But I want
 23 to make it clear I'm not an MRCPPath.
 24 Q. Right, thank you.
 25 Do your specialisms that you have listed in your CV

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1 include the medical effects of inhalation of toxic smoke
 2 and gases on the human body?
 3 A. They do, as far as a toxicologist would normally deal
 4 with these matters, or a physiologist, yes.
 5 Q. Yes.
 6 You currently act, I think, as a consultant in
 7 relation to toxicology, environmental hazards and human
 8 behaviour in emergencies, combustion chemistry and
 9 hazard modelling.
 10 A. Those are the areas where I'm active, yes.
 11 Q. Yes. You are currently a visiting professor at the
 12 University of Central Lancashire --
 13 A. That's correct, yes.
 14 Q. -- at the centre for fire and hazards science, I think.
 15 A. Yes.
 16 Q. If we go to page 2 of this document {DAPR0000010/2}, we
 17 can see there, in summary, that for 17 years or so
 18 between 1974 and 1991, you were in the department of
 19 inhalation toxicology at the Huntingdon Research Centre,
 20 where you conducted and directed research in
 21 environmental and inhalation toxicology; yes?
 22 A. That's correct, yes.
 23 Q. Did that work include research into the effect of fire
 24 products on the nervous system, the lung function and
 25 behaviour in order to evaluate the mechanisms whereby

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1 fire products cause incapacitation and death?
 2 A. Yes, it did.
 3 Q. Yes.
 4 If we look a little bit above that, we can see that
 5 from 1991 to 2006 you worked for the Building Research
 6 Establishment, the BRE, Fire Research Station, now
 7 BRE Limited, where you continued to work on the
 8 toxicological and behavioural aspects of human fire
 9 exposures; is that right?
 10 A. Yes, that's correct.
 11 Q. That related to occupant behaviour in relation to means
 12 of escape, chemical yields of toxic smoke and evaluation
 13 of fire hazard development; is that right?
 14 A. Yes, those were the areas of research I was conducting.
 15 Q. Yes.
 16 On page 3 {DAPR0000010/3}, if we go to that, please,
 17 you identify yourself as a member of a number of
 18 institutions, including the Royal College of
 19 Pathologists, the British Association for Lung Research
 20 to 2017, and the International Association of
 21 Fire Safety Science to 2018; yes?
 22 A. Yes.
 23 Q. Yes, and you were awarded a CBE for services to
 24 fire safety in the 2015 new year's honours list.
 25 A. I was, yes.

13

1 Q. In 2013, the Institute of Fire Engineers awarded you the
 2 David Rasbash Medal for outstanding contribution to the
 3 advancement of knowledge in fire behaviour; yes?
 4 A. They did. I'm not a member of the Institution of Fire
 5 Engineers, but they did grant me that honour, yes.
 6 Q. If we go to page 4 {DAPR0000010/4}, you say you were
 7 a member of a number of British and international
 8 standards committees.
 9 A. Yes, I'm still a member of some of those, yes.
 10 Q. They include, I think -- you set them out -- hazard to
 11 life from fires.
 12 A. Yes, that still continues, I'm a member of that still.
 13 Q. Fire safety engineering, means of escape.
 14 A. Yes.
 15 Q. And the National Association of State Fire Marshals
 16 scientific advisory group?
 17 A. That's now more or less wound up, but I was a member of
 18 that for a number of years, yes.
 19 Q. Right. I think you have also been a member of various
 20 Department of Health expert committees, as you have set
 21 out.
 22 A. In the past, yes.
 23 Q. In the past. And you have lectured widely on
 24 toxicology, combustion chemistry and fire safety at
 25 universities nationally and internationally, I think.

14

1 A. Yes.
 2 Q. At page 5 {DAPR0000010/5} you say that you have also
 3 worked as a legal expert in a number of different fora
 4 nationally and internationally on the subjects of fire
 5 toxicity and human behaviour.
 6 A. Yes, these were various cases that came up over the
 7 years.
 8 Q. Also on page 5 we can see that one of those appointments
 9 was as expert to the Département de Savioie in Chamberéy,
 10 France, the Tribunal de Grand Instance De Bonneville
 11 Procès de la catastrophe du tunnel du Mont-Blanc, in
 12 2004 to 2006.
 13 A. Yes.
 14 Q. Yes. On page 6 {DAPR0000010/6} you have authored and
 15 presented a total, I think, of 152 -- we have counted,
 16 I think, 152 -- publications and conference
 17 presentations between 1969 and 2018; yes?
 18 A. Yes.
 19 Q. And one can scroll down at some length to see what they
 20 are if one wants to; yes?
 21 A. Yes.
 22 Q. Yes.
 23 Now, can I then go to your Phase 2 work and start
 24 with some general principles, and we will pick up some
 25 specific instances later in your evidence.

15

1 The easiest place to start, I think, would be your
 2 contents page on {DAPR0000005/13}, please. We can see
 3 there that the report, which is a very long and complex
 4 document, to be fair, is helpfully arranged in the
 5 following sections. You have got the summary of
 6 contents here, and then you've got "Introduction", then
 7 "Methodology" is section 2, and if we turn the page
 8 {DAPR0000005/14}, please, we have section 3, which is
 9 the "Results of analysis of fire and toxic smoke spread
 10 and effects on exposed occupants".
 11 A. Yes.
 12 Q. Section 4, "Analysis of toxicology results", and then
 13 over the page again {DAPR0000005/15}, section 5 is the
 14 "Extent to which different materials are likely to have
 15 contributed to the effects of toxic smoke on the tower
 16 occupants". Then section 6, underneath that,
 17 "Floor-by-floor analysis of causes of incapacitation and
 18 death at Grenfell Tower". Yes?
 19 A. Yes.
 20 Q. Then a number of appendices. Appendix A is, "Timings
 21 and reported smoke conditions in the stair"; appendix B
 22 is "Analysis of fire spread across the tower"; and then
 23 we don't need to turn the page, but appendix C is
 24 "Common terms and abbreviations", and then the CV which
 25 I've shown you.

16

1 Now, I want to start by asking you to take us
 2 through these sections and explain, first, the purpose
 3 of each one and, secondly, how they link together.
 4 So to begin at the beginning, as it were, how was
 5 the work that you conducted during this phase of the
 6 Inquiry different from the work that you undertook at
 7 Phase 1, in very broad terms?
 8 A. It's more a question of depth than ... so for Phase 1
 9 I was asked to do two sort of things, really. One was
 10 to talk in general about fires, and I talk about various
 11 past experiments and cases we'd done, how people are
 12 overcome in fires. I talked a lot about the toxicology
 13 of fires, effects of heat in fires, this sort of thing.
 14 Then the other thing I addressed in Phase 1 was, if you
 15 like, a preliminary general outline of what I felt had
 16 happened in terms of exposure to toxic smoke at
 17 Grenfell Tower.
 18 I was just reviewing my summary of that report
 19 before we came today, and I feel it's still very much
 20 valid and stands up against what I've done in part 2.
 21 The main thing I wanted to do and I felt needed to
 22 be done in part 2, as I said, was to address in detail
 23 what had happened to each individual person who died in
 24 the fire, and in order to do that, I carried out --
 25 I used two sort of approaches, right? So for one

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1 approach I found it helpful to understand what had
 2 happened to, as it were, step back and look at the tower
 3 as a system, the occupants and the tower and the fire,
 4 everything that was in it, step back and look at it as
 5 a system. I found that very helpful because, as I think
 6 we've already indicated to some extent, for example, if
 7 you look at what happened in one flat 6 on one floor,
 8 you'll find that the same sort of things, same sort of
 9 conditions, were occurring in all the flats 6 almost at
 10 the same time, and then very similarly in flats 1 all
 11 the way round. So to understand what had happened,
 12 because our information tends to be somewhat patchy --
 13 some flats we have good information, some somewhat less
 14 so -- I found my understanding was certainly assisted by
 15 looking at them as a group.
 16 Similarly, when you're thinking of what's going on
 17 in the lobbies, which is a crucial part of this, then on
 18 each floor the lobbies are -- to understand what's
 19 happening in the lobbies, you need to look at what all
 20 the people in all the flats on that floor are doing, and
 21 by looking at the lobbies as a set, it also helped me to
 22 understand how things were unfolding.
 23 Obviously the stair is common to everybody, and what
 24 happens in the stair with time is so important in the
 25 outcomes of this incident. I was looking at the stair.

18

1 So, in a way, I'm pooling the data to improve my
 2 understanding.
 3 Another way I pooled the data is with respect to the
 4 toxicology and pathology results. Now, unfortunately,
 5 as you're aware, many of the persons who died in flats
 6 at Grenfell, their bodies were essentially reduced to
 7 ashes, and so the amount of information that we're left
 8 with for toxicology/pathology is rather limited.
 9 I think Alecoto Forensics did a wonderful job in
 10 locating the bodies in the various flats, and I've made
 11 great use of their work, but fortunately we have a small
 12 number of cases where sufficient tissues were obtained
 13 from the flats to get some blood toxicology data and
 14 some pathology data. By inference, and looking at other
 15 people who were in the same flats or similar flats on
 16 different floors, I think this has given us a good
 17 understanding of how things worked out.
 18 Similarly, I'm very grateful to 21 persons who gave
 19 me permission -- survivors who gave me permission to
 20 look at their hospital data, and by pooling that data,
 21 I feel I've learned a lot about the conditions,
 22 particularly in the stair and the flats, for those who
 23 survived, which also affected those who died. So by
 24 looking at it as a pooled dataset, that was very helpful
 25 to me. Also, by pooling that data I was able to

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1 preserve the anonymity of those persons and just look at
 2 them as a group.
 3 So that's all this sort of looking at things as
 4 pooled sets, and then in part 6 of my report, that's
 5 where I go floor by floor in detail, looking at the
 6 analysis for each flat, particularly those where people
 7 died, and how they were individually affected.
 8 So that's the overall approach that I've used.
 9 Q. Yes, thank you very much.
 10 In the most general of terms, if you can do this --
 11 it may not be possible -- are you able to summarise
 12 extremely pithily what you found as a result of having
 13 done that work?
 14 A. Yes, I'll try to.
 15 So I think it's helpful to look through it in
 16 a sequence. So the first thing that's happened,
 17 obviously, is that we have the fire going rapidly up the
 18 east side of the tower, outside basically the kitchens
 19 of each flat 6. As the fire arrived at each level going
 20 up, it very quickly broke through into those flats, and
 21 the occupants of those flats became aware very quickly
 22 that there was something wrong; in fact, many of them
 23 were aware before the fire actually got to their flats.
 24 The key actions they took was they were obviously --
 25 they went to the kitchen, they saw the flames outside,

20

1 they saw the flames starting to break through and the
2 smoke filling their flats. They were immediately very
3 highly motivated to evacuate.

4 I've read the individual witness statements and some
5 of the evidence in some detail and studied it, and
6 I have to say at this point all those witness statements
7 that I spent a lot of time looking at were very, very
8 helpful to me in understanding what had happened, so I'm
9 very grateful to those witnesses for making all those
10 statements.

11 What it showed is that they rushed very quickly,
12 some of them ran out without -- only partially dressed,
13 they went to maybe grab a phone and a passport and the
14 children, as it were, and all the occupants of flats 6
15 evacuated the flats within very few minutes, very, very
16 quickly. They then went out into the lobbies at
17 an early stage in the fire, when the lobbies were still
18 substantially clear of smoke, and then most of them then
19 entered the stair and the stair was clear of smoke. So
20 they were able then to move down the stair or between
21 floors within the building, and many of them evacuated
22 the tower at that time. Sadly some of them, as we know,
23 took refuge in other flats higher up the building. But
24 the key point about those flat 6 occupants was they were
25 highly motivated by the smoke and fire coming into their

21

1 flats to immediately evacuate, and they were able to do
2 so because the lobbies were clear and the stair was
3 clear at that time.

4 That then contrasts with what happened next, because
5 within a few minutes of them doing that, the lobbies on
6 most floors became filled with dense smoke, and those
7 occupants -- some occupants of other flats had already
8 left during this early phase, but once that happened,
9 I feel it strongly inhibited those who had remained in
10 their flats from attempting to escape.

11 So the filling of the lobbies within a couple of
12 minutes of the fire arriving outside each flat 6 on each
13 floor, the filling of the lobbies was a key event which
14 then inhibited occupants from escaping, led to many of
15 them remaining in their flats and ultimately led to
16 their being overcome by asphyxiant gases and dying in
17 their flats. So this was a key event.

18 Now, some occupants, even after the lobbies filled
19 with smoke during this early stage, were highly
20 motivated to escape and succeeded in crossing the
21 smoke-filled lobbies. Finding the stair had some smoke
22 but really not very much, they were then able to descend
23 and escape in safety.

24 The whole thing sort of goes in periods of time. So
25 you've got this sort of period of time before about 1.25

22

1 to 1.30--odd, when on different floors the lobbies were
2 relatively clear, so people were able to move around and
3 escape relatively "easily", in quotes.

4 Then you have the period when the lobbies are
5 filling with smoke. Some people are still coming out.
6 About 50 -- more than 50 people succeeded in crossing
7 that smoke and coming down the stair through reasonable
8 conditions at that time -- we can go into detail later
9 if you wish. And at the end of that period, which takes
10 us up to about 1.41, something like that -- now, the
11 last couple of people who came down from a high floor in
12 the tower were Petra Doulova and her companion, and they
13 crossed the lobby with some difficulty, leaving at about
14 1.36 on the floor they evacuated from. With some
15 difficulty, they managed to make it to the stair, but
16 they were then able to descend in safety.

17 Then we have a break of a period about half an hour
18 or more when nobody comes down, and I believe what's
19 happening then is that those people who were still in
20 the tower had remained in their flats, so they were
21 sort of staying put, as it were, and that was partly
22 influenced by the fact that their flats at that time
23 were relatively clear of smoke, for most of those flats,
24 but they were inhibited from leaving by the smoke in the
25 lobbies.

23

1 If I may, I would suggest it's a little bit like --
2 the way to look at this from the point of view of
3 effects of irritant smoke is it's partly physiological
4 and it's partly behavioural. So it's a little bit like
5 if you imagine a pair of scales, and there are weights
6 going into either pan, "Do I go or do I stay?" And
7 I feel very sorry for these occupants who were trapped
8 in these flats, because those who left early, after
9 early cues that there was a fire outside -- noises of
10 fire engines, people ringing them up, bit of smoke,
11 smell maybe, a bit of odour -- they made this decision
12 to leave at an early stage, they opened the door to the
13 lobby, found the conditions clear, so they had, if you
14 like, weights in the side of the pan that is saying,
15 "I think we should go" or "We should go and
16 investigate", and they had no obstacle to them doing
17 that, so they were able to perform that task with
18 relative confidence. Once the lobbies filled with
19 smoke, then they had a strong incentive not to enter
20 that lobby and they needed a very big push factor to
21 make them do it. Do you understand how I'm looking at
22 these various influences on people? So it's
23 a combination of behavioural and physiological effects.

24 So those people that remained in their flats were
25 able to do so initially because their flats were

24

1 relatively clear of smoke. But over various — the next
 2 hour or so, depending on which flat you were in, the
 3 external fire moved round the building and comes to each
 4 flat in turn, first to flats 1, then to flats 2 and
 5 flats 5, then to flats 4, and then to flats 3 eventually
 6 at about 3.30/4.00. And as the exterior fire came round
 7 the outside of these flats, the occupants were then
 8 faced with this difficult decision again. Now they had
 9 a very urgent situation, because they had a large fire
 10 coming round the outside and penetrating from the
 11 outside of their flats, and they also had the dense
 12 smoke in the lobbies. And so we have a second wave, if
 13 you like, of occupants who attempted, and many of whom
 14 succeeded, in evacuating at that time.

15 Now, from my analysis of the conditions and the
 16 timing of this, I spent a lot of effort into trying to
 17 establish the exact timelines for these events, exactly
 18 what people were exposed to at different times and how
 19 they were affected, and my overall conclusion from this
 20 is that those occupants who remained in their flats
 21 until the exterior fire arrived, if they left their flat
 22 and attempted to cross the lobby and enter the stair as
 23 soon as or within a few minutes of the arrival of the
 24 exterior fire, the exposure that they'd had to some
 25 toxic smoke via leakage from the lobby up to that point

25

1 was relatively minor; in other words, they hadn't
 2 accumulated a large dose of asphyxiants up to that time.
 3 So if they were able to cross the dense — the lobbies
 4 were extremely hazardous, filled with very dense smoke
 5 and high concentrations of asphyxiant gases. So if you
 6 for example were in a flat 3 and you wanted to get
 7 across to the stair, you only had a very short distance
 8 to cross, and although the conditions in the lobby were
 9 really bad, you had a good chance even of holding your
 10 breath for the short period of time to cross to the
 11 stair. Once you've got into the stair, there was a lot
 12 of smoke in the stair, but, from my analysis, the
 13 concentrations were moderate, which meant that it was
 14 possible to walk down the stair and spend up to about
 15 15 minutes walking down the stair, breathing asphyxiant
 16 gases on the way down, and this is very unpleasant, but
 17 by the time a person got to the bottom of the stair, the
 18 dose they'd accumulated was on the cusp, on the
 19 threshold, of an incapacitating dose of carbon monoxide.
 20 So if you had acquired a limited dose, as I believe
 21 these occupants had, up to the time you left the flat
 22 and you crossed the lobby efficiently, you had a good
 23 chance of succeeding in walking down and escaping the —
 24 walking out the tower. And that continued up to
 25 about — the last person to do this was at about

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1 4 o'clock, from a high level of the tower, and then
 2 a couple of others came out later from lower levels of
 3 the tower.

4 So this shows that the conditions in the stair — in
 5 the stair — remained survivable, if you like,
 6 negotiable, for a long period of time during the
 7 incident, and if people were encouraged to leave before
 8 they were overcome in their flats, they had a good
 9 chance of being able to make it out alive.

10 Now, then you have a group of people who attempted
 11 to leave their flats but collapsed almost immediately in
 12 the lobby, or on the first flight of the stair when they
 13 got into the stair, or perhaps after a couple of floors,
 14 and when I analysed the situation for that group, that
 15 cohort, if you like, what I find is that those were
 16 mostly people who remained too long, remained longer in
 17 their flats.

18 Now, what happened with each flat was that obviously
 19 you've got multiple rooms in a flat, and the fire is
 20 moving round slowly in a sideways manner. So depending
 21 on which flat you're in, it starts to come to one room
 22 in your flat. So for example if you were in a flat 1,
 23 the first room affected by the fire coming from flat 6
 24 is the living room. That meant that for the occupants
 25 of those flats, flats 1, for example, were able to

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1 shelter in the bedroom, the next room along. If they
 2 closed the interior doors, they were able to remain in
 3 there for some time, even though there was fire coming
 4 past the living room next door. Then eventually, the
 5 fire moved past their last refuge, in whichever flat
 6 they were in. Once the fire came externally outside
 7 their — and broke through the window in their room of
 8 refuge, where they were sheltering, then conditions
 9 deteriorated very rapidly, and occupants who tried to
 10 evacuate then had acquired too much of a dose of
 11 asphyxiants before they tried to leave, and that's why
 12 they collapsed so quickly in the lobby or the stair.

13 I have a couple more points, if I may continue, sir?

14 Q. Yes, please.

15 A. So those who died immediately in the lobby or almost
 16 immediately after entering the stair, often that's
 17 because they'd remained in the last refuge room, if you
 18 like, of their flat too long, in a sense, they got too
 19 big a dose before they tried to set out, and in a couple
 20 of cases I think they more or less just stepped out the
 21 door and immediately collapsed, so they only just made
 22 it out before they would have collapsed in the flat.
 23 Those who remained in the flats were then rapidly
 24 overcome and asphyxiated by asphyxiant gases, mostly
 25 carbon monoxide.

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1 From my analysis of the pathology and toxicology
2 data we have, all those occupants for whom we have blood
3 data show very, very high doses of carbon monoxide in
4 their blood, well above the lethal threshold limit. So
5 I am convinced that they died from smoke exposure,
6 inhalation of asphyxiant gases, not from burns, although
7 their bodies were subsequently burned in the fire, many
8 of them.

9 So that's the people who died in the flats.

10 Yes, the other point I wanted to make was the
11 lobbies. The lobbies were -- from the accounts of
12 people who tried to cross the lobbies -- and I'm talking
13 mainly here from about 2.00 or 2.30 up to about 4.00 --
14 the condition -- the smoke in those lobbies was
15 incredibly dense, and by my understanding of the
16 composition of the smoke, that means that the
17 concentrations of asphyxiant gases -- carbon monoxide
18 and, to a somewhat lesser extent, hydrogen cyanide --
19 were of very high levels, capable of causing collapse if
20 inhaled after three or four minutes. Very high levels
21 indeed.

22 Now, as I've said, if you were in a flat 1, a flat 2
23 or a flat 3, the distance you had to travel in order to
24 get from the front door of your flat to the stair door
25 was really quite short, and so most people who attempted

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1 to do so were able to do that without really being
2 exposed to these extreme conditions for very long in the
3 lobby.

4 Where I found a problem arising was for occupants of
5 flats 5 and flats 4, because they had a more complicated
6 and tortuous -- and not particularly longer, but a bit
7 longer, but it was mainly the complexity of the route,
8 and I've read a number of accounts of surviving
9 witnesses who became disorientated and confused in those
10 lobbies. A couple of them went into the rubbish chute
11 door by accident, others tried to open the cupboard that
12 had recently been installed, and so they were having
13 great difficulty finding their way to where the stair
14 door was. Some of them had to go back and try a couple
15 of times before they succeeded in doing this. So they
16 were in danger of inhaling -- of exposure to these
17 extreme conditions in the lobby.

18 Now, in most cases they managed to negotiate and did
19 this, but there were a couple of examples where I think
20 people succumbed because they were exposed to those
21 conditions, and I think I should mention at this point,
22 I think the Belkadi family are one where we should
23 explore this area of the lobby influence.

24 The second, which is a clear example, in a way, is
25 the three persons who died on the 10th floor, because

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1 they arrived in the lift to the 10th floor having had
2 virtually, in my opinion, no exposure to anything up to
3 that point, and yet having stepped out of the lift, they
4 were unable to cross that short distance to the stair to
5 carry on down the stair, and their bodies -- one body
6 was found just outside the lift; the other two were
7 found in the little blind corridor that led to flat 1.
8 I think they became disorientated -- well, they did,
9 they became disorientated in that lobby and, therefore,
10 inhaled that lobby smoke for a few minutes. Now, it has
11 to be only a few minutes, because say it had been
12 20 minutes, surely you would have found your way to that
13 stair door. They had to have been overcome within
14 a very short period of time. And this is about 1.25.
15 This is just after the fire has come up past that floor.
16 So this tells me that the conditions in terms of
17 asphyxiant gas concentrations, certainly on the
18 11th floor and, I believe, by inference, in most of the
19 other lobbies up the tower -- not all of them, but most
20 of them -- were really extreme at this time, and that's
21 why we've got those particular cases.

22 Just finally to round this off, from the analysis
23 I've done, looking particularly at the survivors and
24 those who -- the hospital data I had, the conditions in
25 the stair were never as bad as that. The conditions in

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1 the stair were of moderate concentrations of smoke and
2 asphyxiant gases, such that although they were very
3 hazardous, as I say, it was possible to inhale those
4 conditions in that stair for maybe 15 minutes without
5 being overcome, if you were an adult. Slightly more
6 hazardous for children.

7 I think that more or less covers my points I wanted
8 to raise at this time. Thank you.

9 Q. Yes, thank you very much, professor.

10 Now, before we turn to some detailed aspects of your
11 approach and your methodology, I just want to highlight
12 with you, if I can, the principal caveats in the light
13 of which your approach and your analysis and conclusions
14 should be viewed.

15 A. Yes.

16 Q. First, it's right, I think, that it wasn't possible to
17 measure exact concentrations during the fire and all
18 your analysis is based, I think, on estimations on the
19 available evidence.

20 A. That's correct, yes.

21 Q. They're not exact measurements but approximations, doing
22 the best you can.

23 A. That's correct, yes.

24 Q. You have used, I think, a squiggle to show that all
25 times that you've --

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1 A. I understand it's called a tilde .
 2 Q. A tilde -- it's in my note and I wasn't sure whether
 3 that was a typographical error or not -- to show that
 4 the times that you have given are approximations.
 5 A. Yes.
 6 Q. Yes. When you have provided a time of death as
 7 approximately or with a tilde , how broad was the
 8 estimated time range?
 9 A. Yes, I had some difficulties with this, because --
 10 I think it might be an opportunity to explain -- may
 11 I use the flipchart ?
 12 SIR MARTIN MOORE--BICK: If you find it helpful, do, yes.
 13 A. We're talking mainly here about carbon monoxide as the
 14 main cause of incapacitation and death in these
 15 occupants. So I'm just going to draw and then I'll come
 16 back and ...
 17 (Pause)
 18 I'm not the next Banksy, I'm sorry.
 19 If we think of somebody who's exposed to carbon
 20 monoxide at, say, a thousand parts per million
 21 concentration, which is about half what there was,
 22 I believe, in the stair , and say there's somebody
 23 walking down a corridor, for example the Mont Blanc
 24 Tunnel, as you alluded to earlier , I analysed that, or
 25 down the stair at Grenfell , and if we assume for

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1 a moment that the concentration of gas they're inhaling
 2 is constant all the time they're walking down, and on
 3 the right--hand axis here I'm looking at the percentage
 4 of carboxyhaemoglobin in their blood. If we assume that
 5 they start off with a clean sheet, that they haven't had
 6 any exposure, every time they inhale this smoke
 7 containing this toxic gas, then each lungful of carbon
 8 monoxide then combines with the haemoglobin in your
 9 blood to form carboxyhaemoglobin, COHb. Of the 100% of
 10 haemoglobin in your blood, an increasing proportion
 11 becomes converted to carboxyhaemoglobin, which means the
 12 bit left over to carry oxygen to your brain and your
 13 tissues is reduced in proportion. Not only is it
 14 reduced in proportion, but the carboxyhaemoglobin
 15 inhibits the release of the oxygen that is carried to
 16 the tissue, so it's a very serious effect on oxygen
 17 supply to the body.
 18 So what effect does this have?
 19 Well, initially -- so you get a steady increase
 20 where let's say this is 100% and we're starting to go up
 21 the scale. So let's say you get up to 10%
 22 carboxyhaemoglobin. What will that do to you? Well,
 23 the answer is: virtually nothing; you would be totally
 24 unaware that you are inhaling it and it will have no
 25 effect on you whatsoever. A heavy smoker can get up to

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1 10% carboxyhaemoglobin without showing any symptoms at
 2 all .
 3 The problem arises if you're actively walking along
 4 when the percentage rises to about 30%. So for
 5 a person -- and this is based on experiments, partly on
 6 experiments that I carried out myself -- at 30%, you're
 7 liable to get a sudden change from being normal --
 8 walking around, good condition, if you're on the phone,
 9 you're making good contact and agreement with people --
 10 you suddenly become dizzy and then you collapse. You go
 11 over a sort of physiological cliff . It's quite
 12 dramatic. You collapse down and you're now unconscious
 13 and more or less in a coma, and that's at 30%. As soon
 14 as that happens, your breathing drops considerably. So
 15 if you were walking down a stair, you might be breathing
 16 20 litres of air a minute. As soon as you collapse and
 17 you're unconscious, that could drop to about 5 litres
 18 a minute. So, of course, the effect this has is that
 19 then the rate of uptake of the gases that you're
 20 inhaling is slowed down. So the increase in the level
 21 in the blood still carries on increasing, but at
 22 a slower rate.
 23 The other problem we have with Grenfell is that,
 24 depending on where you were, the concentration you were
 25 inhaling might also be changing. But we can make

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1 a pretty good estimate up to this point of collapse , and
 2 that's very important, of course, in the Grenfell
 3 context, because if you're anywhere in the tower and you
 4 haven't collapsed , then you still have the ability to
 5 move around and possibly escape. Once you are
 6 unconscious, you're going to just stay there. Unless
 7 somebody gets to you and carries you out immediately,
 8 you're going to stay there and carry on inhaling and
 9 eventually die, as we know many people did.
 10 So we've got to the 30%. What then happens is you
 11 then have this slow continued uptake until you get to
 12 about 50%, and I've got some slides to show you there if
 13 you want to of data on this. 50% carboxyhaemoglobin,
 14 half your haemoglobin converted to carboxyhaemoglobin,
 15 is more or less the threshold for lethality , and what
 16 that means is if you're alive and you reach 50%, if you
 17 are rescued at that point and treated and given oxygen
 18 to breathe, your probability of recovery is very poor.
 19 So if you have got 40% in your blood and you're rescued,
 20 unconscious, and treated, you should wake up within
 21 a few minutes, and within half an hour or so all that CO
 22 is taken from your body, you should make a good recovery
 23 and there's a good chance you'll have no subsequent
 24 effects from an acute exposure like at Grenfell . You'd
 25 make a good recovery. Once you have got to about 50%,

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1 you're very unlikely to survive. You will most likely
2 suffer brain death and never be able to recover.
3 I mean -- but, of course, it depends a bit on the
4 individual, but that's the general point. So 50%
5 carboxyhaemoglobin is a very important endpoint for us
6 to bear in mind.

7 Now, what happens next? So let's say the subject
8 has got to 50% but they're still alive. So they're
9 lying down, they're in a coma, they're totally unaware
10 of what's going on, they're breathing very slowly, and
11 their breathing is slowing continuously, at a rate
12 depending upon the individual person. This process
13 continues, with the concentration in their blood
14 continuing to increase, until their heart circulation
15 and their breathing cease. At that point, they die, and
16 the concentration of carboxyhaemoglobin in their blood
17 is, if you like, frozen at that point. If we recover
18 pathology samples, that is the level that we will then
19 measure, and it's very stable in the cadaver, in the
20 blood at autopsy.

21 So 50% is the threshold, if you like, the point of
22 no return for most people, but the amount that you find
23 if you recover a sample from that person, it can be
24 anything between 50 and even in the upper 90% at death.
25 So a person who's got 90% in their blood at the point of

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1 death -- and there were a couple of examples at
2 Grenfell -- it meant they must have been technically
3 alive and continuing to breathe until they reached that
4 point, very, very slowly, with their respiration
5 gradually failing. So it's very difficult for me to
6 calculate, if you like, that time, because of the
7 variability in the amount they're breathing and possibly
8 in the gases they're inhaling, but I can give a very
9 approximate window if I've got that data. If I know
10 they died at 90%, I know they must have lived for a long
11 time before they died. But even though they reached
12 that high level, they would not have been -- it was not
13 survivable. So had they been rescued -- removed at that
14 time and treated, there's really no chance that they
15 would have survived. So the 50% is more important in
16 that context.

17 MR MILLETT: Yes, thank you.

18 A. Now, another level, as I mentioned earlier, that I think
19 we also need to be very interested in is the highest
20 level that they could reasonably achieve while in
21 various locations in the tower and still have the
22 headroom, if you like, to be able to take up more and
23 not reach a collapsing dose by the time they evacuated.
24 So I think that's why this succession of endpoints need
25 looking at.

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1 In some way, the final one just tells us the point
2 at which they actually -- the system -- the vital
3 systems packed up, if you like, stopped working, but it
4 doesn't really relate to whether or not they could have
5 survived.

6 Sorry, does that help?

7 Q. Yes, it does, thank you very much.

8 A. Just one very final point. If we don't have
9 carboxyhaemoglobin data for that particular individual
10 who died, we don't know whether they died at 50 or 90,
11 so I have to give the range. It could be either of
12 those extremes.

13 SIR MARTIN MOORE-BICK: Professor, would we be right in
14 understanding -- maybe this puts it a little crudely --
15 that at 30% you become unconscious and comatose, and at
16 50% you're likely to die?

17 A. Yes. There's another caveat on that, though. If you're
18 in a flat and you're just sort of sitting around or
19 walking around the flat, or as we are in the court here
20 now, then the threshold at which you become unconscious
21 is round about 40% carboxyhaemoglobin. When you get up
22 and start walking actively, as down the stair, then you
23 obviously need more energy, more metabolic input to your
24 breathing, and so you succumb at a lower dose when
25 you're being physically active.

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1 In fact, what has been observed quite a lot in fire
2 deaths is somebody who was maybe in bed in a house with
3 a house fire -- I remember a particular case where two
4 children were in bunk beds, and they achieved quite high
5 blood levels, but they were found in the act of trying
6 to get up and get out of the beds. So the very physical
7 act of moving was enough to make them collapse at that
8 point.

9 SIR MARTIN MOORE-BICK: Thank you.

10 MR MILLETT: Yes, thank you.

11 Just in relation, then, to further caveats, I think
12 we can take this quite quickly.

13 A. Sorry, yes.

14 Q. No, it's very helpful to have that presentation,
15 professor, it really is. I just want to go back to the
16 caveats just for a moment.

17 A. Yes.

18 Q. It's right that your information came from a wide range
19 of sources and included witness statements from
20 occupants and firefighters; yes?

21 A. Yes.

22 Q. Some of the 999 call transcripts?

23 A. Yes.

24 Q. Photographs and analysis of external fire spread?

25 A. Yes.

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1 Q. And other experts' reports, such as those of Dr Lane,
 2 Professor Bisby and Professor Torero; yes?
 3 A. Yes, and of course I relied very heavily on the
 4 Chairman's Phase 1 report appendix for the times of
 5 leaving the tower for each person.
 6 Q. Yes. Is it right that where there's a substantial
 7 amount of evidence about a particular deceased, your
 8 findings have taken into account that evidence?
 9 A. Yes.
 10 Q. I think it's right also, as you have said, that in some
 11 cases there was very limited information available about
 12 particular individuals, and is it right that, in that
 13 situation, your analysis has been limited by those
 14 constraints?
 15 A. That's correct.
 16 Q. Yes.
 17 Now, I just want to examine some methodology with
 18 you, just identifying where it is in the report,
 19 section 2 largely.
 20 At paragraph 10 of your Phase 2 report, page 18 --
 21 we don't need to go to it, I don't think -- at
 22 {DAPR000005/18}, you have described the essential
 23 principles of the production of toxic smoke during
 24 a fire.
 25 In summary, is it right -- and I'm just going to put

1 these propositions to you -- first, that burning
 2 materials produce a wide range of toxic products?
 3 A. Yes.
 4 Q. And some toxic products are produced from most
 5 materials.
 6 A. Yes.
 7 Q. Is it right that the type of toxic product produced from
 8 a material will depend upon the extent of the elemental
 9 and organic composition of the particular material?
 10 A. Yes.
 11 Q. They divide into, I think, gases and particulates; yes?
 12 A. Yes. Yes, that's correct.
 13 Q. Is it right both can be irritants?
 14 A. Yes. So basically all materials when they burn have
 15 a high carbon content, and when that carbon in the fuel
 16 is burnt, it turns to a range of products, and one set
 17 that we're very interested in is the carbon particles,
 18 which are the actual smoke and soot particles, which
 19 obviously affect your vision, but a proportion is
 20 released as partly combusted organic materials,
 21 substances, some of which can be very highly irritant,
 22 powerful chemical irritants, which are often associated
 23 with these particles. So that's one category that we
 24 really need to consider very carefully.
 25 Another source of these irritants is acid gases, and

1 these acid gases only occur if the relevant elements are
 2 present in the fuel, and the most important one is
 3 chlorine. So many, many substances have a certain
 4 amount of chlorine in the organic -- added to the
 5 organic matrix of the material. When these are burned,
 6 it produces hydrogen chloride acid gas, which is
 7 a strong irritant. So those are the irritants.
 8 Then we have the asphyxiant gases, and really it's
 9 a very short list, and the most important are carbon
 10 monoxide, hydrogen cyanide. Carbon monoxide from all
 11 materials that burn, because they all contain carbon;
 12 hydrogen cyanide only if they have nitrogen in the
 13 organic structure of the material.
 14 Q. Yes, thank you.
 15 Now, we're going to come back later to your analysis
 16 of the three main fuel packages at Grenfell Tower and
 17 their relative contributions to the production of toxic
 18 gases in that incident.
 19 In your report you have referred to some common
 20 terms which inform your analysis and your work, and you
 21 have explained those in more detail in the Phase 1
 22 report. Could you just explain to us what a fractional
 23 effective dose is?
 24 A. Yes.
 25 Q. It's one of those terms.

1 A. I might have to go back to the board.
 2 (Pause)
 3 Q. If you need your Phase 1 report, I can show it to you.
 4 A. Well, I'm just going to try and explain the principle of
 5 it.
 6 Q. Right, do that.
 7 A. If we think of carbon monoxide again, one way of
 8 expressing a dose of carbon monoxide that would
 9 incapacitate you is in terms of the amount available to
 10 inhale. So if, for example, we had 3,500 parts per
 11 million, and we inhaled that for ten minutes, then you
 12 could express the dose inhaled as 35,000 ppm dot
 13 minutes. So the concentration multiplied by the time is
 14 an expression of dose available.
 15 So if we were in a particular fire, with time, as
 16 I showed you earlier, the person would have inhaled
 17 a certain dose up to that time, and the FED, the
 18 fractional effective dose, is a way of expressing that
 19 in a sort of normalised form. So what we do is very
 20 simply we have a fraction, and the denominator of that
 21 fraction is 35,000, which is the dose required to cause
 22 incapacitation, and the numerator is the dose obtained
 23 up to that period of time in the actual event. So let's
 24 say it's 1,000 ppm for ten minutes, then you would have
 25 had 10,000 ppm minutes, divide that by 35, that gives

1 you the FED as a fraction up to that point of time.
 2 So we sum these fractions throughout the fire until
 3 the fraction becomes 1, until this equals that, and we
 4 say at that point the person will collapse. So FED 1 is
 5 the fractional dose predicted to cause incapacitation.
 6 Now, that's for a single gas. But, of course, we
 7 have multiple gases, and so we have to have some way of
 8 dealing with the combination, and this also provides us
 9 with a way of doing that.
 10 So we do a similar calculation for the fractional
 11 dose of hydrogen cyanide, for example, and from the
 12 toxicological studies that we've made, there's some
 13 complications in this, but we would treat them as
 14 essentially additive. So what we would say is at
 15 a certain point in time, if the FED, fractional dose,
 16 inhaled of carbon monoxide is 0.5, and if the fractional
 17 dose inhaled of hydrogen cyanide is also 0.5, 0.5 plus
 18 0.5 equals 1, we've now reached a time during this
 19 exposure when we predict that person would be overcome.
 20 Q. Yes.
 21 A. That's the essence of it. Is that helpful?
 22 Q. Yes, it does. Just to be clear on this, was there any
 23 significance, though, in your demonstration there of
 24 35,000 parts per million per minute?
 25 A. Yes. So I prefer to — for carbon monoxide, I feel it's

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1 more useful to express the fraction in terms of the
 2 calculated carboxyhaemoglobin, because we can then
 3 relate it to the data that we have. So another way of
 4 expressing this is to say — perhaps I should have done
 5 this before — 30% carboxyhaemoglobin is the dose of
 6 carbon monoxide in the blood at which you would become
 7 overcome. So if you calculate, with expressions that
 8 we've got, the dose achieved — so let's say you've got
 9 15% carboxyhaemoglobin after a certain point in time,
 10 then you've got half of a dose for incapacitation. So
 11 that's another way of coming at it.
 12 Now, in international standards, we use both these
 13 methods, depending on the application, and 35,000 is the
 14 figure in the international — the ISO standard from the
 15 committee that I serve on sometimes. Yes.
 16 Q. Right, I see. So 35,000 —
 17 A. 35,000 ppm minutes of carbon monoxide represents
 18 approximately the dose available to be inhaled that
 19 could overcome you.
 20 Q. Before incapacitation?
 21 A. Up to the point of incapacitation.
 22 Q. Thank you.
 23 A. Expressing it as calculated carboxyhaemoglobin is a more
 24 accurate way of doing it. It also is more useful to us,
 25 because we can then compare our findings with actual

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1 blood measurements made on survivors and fatalities.
 2 Q. Yes.
 3 Now, I want to ask you some questions about the
 4 calculations to estimate exposure to and the effects of
 5 irritant smoke.
 6 Is it right that to estimate the extent of exposure
 7 and the effect of irritant smoke, you have relied on,
 8 first — I know there are a number of things — the
 9 results of a BRE study of materials toxicity?
 10 A. Sorry, I want to just explain briefly, if I may.
 11 So over the years I've done a lot of toxicology
 12 experiments and studied human data on irritancy of
 13 various individual chemical irritants. So there is
 14 a bit of literature out there from industrial hazards
 15 and things on, for example, if a person is exposed to
 16 hydrogen chloride at about 300 parts per million, what
 17 would it do to you? And we have some information from
 18 accidents and things on this. So if you know what gases
 19 are there, you can make some sort of estimate of what it
 20 would do to somebody if they inhaled it. And by looking
 21 at, as we've discussed, the composition, and the data
 22 I obtained when I burnt these materials in tests at BRE
 23 of the gases that come off from these materials, I can
 24 confidently say that all the materials involved, the
 25 various fuel packages that we're going to discuss in

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1 a minute, at Grenfell would have contained considerable
 2 quantities of organic and inorganic irritant gases. So
 3 that's on the supply side of the problem, if you like.
 4 Q. Yes.
 5 A. But to determine what effect those are actually going to
 6 have on an exposed person is somewhat more uncertain.
 7 So we have methods of doing it, but I feel we have
 8 a much better method for Grenfell because we have
 9 a wealth of witness statements on this. So for Grenfell
 10 I've relied for the severity, if you like, of the
 11 irritancy that people experienced on what they said they
 12 experienced, because I felt that was much more
 13 first-hand.
 14 Q. Yes.
 15 Now, I just want to see if I can identify the report
 16 that you refer to. There was a March 2003 BRE study
 17 which you refer to in this context, and I just want to
 18 see if we've identified it correctly.
 19 Can we please go to {DAP00000002} and have that up.
 20 This is a report that you prepared for Anthony Burd on
 21 26 March 2003, "The potential for including fire
 22 chemistry and toxicity in fire safety engineering"; do
 23 you see that?
 24 A. Yes.
 25 Q. Is that the report that you're referring to —

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1 A. Right, so --
 2 Q. -- as the 2003 report?
 3 A. Yes, that report is results of two experiments measuring
 4 the yields and concentrations of these various gases
 5 produced when you burnt that set of materials, and so
 6 that's the dataset that I've relied on for just about
 7 all the work I've done for Grenfell.
 8 Q. Yes, I see, thank you very much. And I think it was
 9 prepared by you and Jenny.
 10 A. It was, indeed.
 11 Q. Your partner.
 12 A. Who is in the court over there, just to make sure I'm on
 13 the ball.
 14 Q. Yes, very good.
 15 The second thing I think you relied on -- is this
 16 right? -- was the tests carried out by
 17 Professor Anna Stec on the elemental composition of
 18 smoke particulates and toxic gas yields from samples
 19 taken from Grenfell Tower itself.
 20 A. Yes. So just very briefly, obviously the work we did
 21 some years ago at BRE was on a generic set of materials.
 22 They were very -- some of which were the same polymers,
 23 the same general materials as there are in Grenfell,
 24 particularly the polyisocyanurate, the polyvinyl
 25 chloride, polyethylene and the polystyrene. So we

1 tested -- those were included in what we did at BRE, but
 2 they weren't actual samples, obviously, from
 3 Grenfell Tower, and so we felt it was important that
 4 samples from the actual tower were tested, and
 5 the Chairman supported this research, so Professor Stec
 6 carried out that research. So that work was done mainly
 7 on the sort of structural materials on samples of
 8 materials actually recovered from the tower.
 9 Does that cover the point? Sorry.
 10 Q. Yes, it does, thank you very much.
 11 The third category of documents you have relied on
 12 was an assessment of witness descriptions of conditions
 13 and medical records, I think, which indicate the extent
 14 of smoke obscuration and the severity of smoke
 15 irritancy.
 16 A. Yes.
 17 Q. Now, let's then turn to the assessment of exposure
 18 concentrations and effects, and I just want to ask you
 19 about your calculations.
 20 A. Yes.
 21 Q. You have explained in the first part of your report,
 22 page 37 at section 2.6 -- let's just go to that,
 23 {DAPR0000005/37}.
 24 A. Yes.
 25 Q. Section 2.6, and this section is entitled:

1 "Using smoke density and visibility as a first
 2 approximation to estimate exposure concentrations and
 3 time to incapacitation from the effects of asphyxiant
 4 gases."
 5 A. Yes.
 6 Q. You have explained here in this section how you have
 7 estimated exposure concentrations and time to
 8 incapacitation on the basis of smoke density and
 9 visibility.
 10 Now, in summary -- and just correct me if I'm wrong
 11 about this -- is it right that when a fuel material
 12 burns, it produces certain yields of particulates,
 13 carbon monoxide and hydrogen cyanide?
 14 A. Yes.
 15 Q. And while the actual concentrations vary as they're
 16 diluted by the air, is it right that the ratios of smoke
 17 particulates, carbon monoxide and hydrogen cyanide each
 18 remain constant?
 19 A. Yes.
 20 Q. Right.
 21 A. Approximately.
 22 Q. And you mean the relative concentration?
 23 A. Yes.
 24 Q. Is it right that you then took the elemental
 25 compositions, the yields and the concentration data from

1 the materials used for the BRE experiments --
 2 A. Yes.
 3 Q. -- that you and your wife, Jenny, carried out to derive
 4 the fuel mixture from the three main fuel packages at
 5 Grenfell?
 6 A. That's correct.
 7 Q. Was that -- let's just tick them off: exterior cladding;
 8 yes?
 9 A. Yes.
 10 Q. The window surrounds.
 11 A. Yes.
 12 Q. And then the mixed flat contents.
 13 A. Exterior cladding and insulation.
 14 Q. And insulation.
 15 A. The first package --
 16 Q. -- exterior cladding system.
 17 A. Yes, that's right, yes.
 18 Q. Yes, the window surrounds, and then the mixed flat
 19 contents; yes?
 20 A. Yes.
 21 Q. Yes. You then used those to estimate the ratios of
 22 those materials --
 23 A. Yes.
 24 Q. -- at Grenfell.
 25 A. Yes.

1 Q. Yes.
 2 Now, let's go, please, to page 41 of this document
 3 {DAPR000005/41}. This is taken from your Phase 1
 4 report, figure 1. Here it is. It's entitled:
 5 "Concentrations of carbon monoxide ... and hydrogen
 6 cyanide ... at different smoke visibilities for a mixed
 7 fuel set (From Phase 1 report Figure 19)."
 8 Am I right that this shows the estimated
 9 concentration of carbon monoxide and hydrogen cyanide
 10 ppm in relation to the visibility reflected in metres
 11 under both well-ventilated and under-ventilated
 12 conditions? Yes?
 13 A. Yes.
 14 Q. Yes.
 15 Have you assumed here the ratio 27:1 for carbon
 16 monoxide and hydrogen cyanide, as you have calculated
 17 elsewhere, or is it some other ratio?
 18 A. Sorry, this example here was for a particular set of
 19 fuels, a fuel package, mixed fuel package, that I worked
 20 on some years ago. It's not dissimilar from the sort of
 21 packages we have at Grenfell, but it was -- this
 22 particular diagram and the data in it weren't
 23 specifically tailored to Grenfell.
 24 Q. Right.
 25 A. But they illustrate the very important point that, as

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1 I've said, the ratios of smoke and hence visibility and
 2 asphyxiant gases within that smoke are linked, the
 3 ratios are constant. So for this particular fuel
 4 package, which is, I would say, fairly typical of what
 5 we would expect to see at Grenfell anyway, there's
 6 a very important point here, which is that if,
 7 for example, you can see for 5 metres at the right-hand
 8 corner of that graph, it means that the concentrations
 9 of these asphyxiant gases, carbon monoxide and cyanide,
 10 that you're inhaling are extremely low, such that you
 11 could breathe them for some hours without really
 12 suffering any ill effects. But as soon as the
 13 visibility gets down to, for example, 1 metre, then
 14 you're starting to get quite serious concentrations of
 15 these gases that could cause incapacitation after some
 16 minutes of exposure -- minutes of exposure.
 17 So as a proxy for a very approximate estimation of
 18 the amount of carbon monoxide and cyanide that people in
 19 Grenfell were inhaling at any particular time, if I can
 20 have an approximate idea of how seriously dense the
 21 smoke was that they were exposed to at that time, I can
 22 make an estimate of that, within these broad ranges.
 23 What I'm looking for is: are we operating in a range
 24 where these concentrations are effectively harmless,
 25 that you could be exposed for some hours without really

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1 suffering? Are they in this kind of middle range where
 2 you might be able to perform -- for example come down,
 3 spend 15 minutes walking down the stair and just about
 4 make it down? Or are we in the realm, as I believe we
 5 were in the lobby of the 10th floor, where two or
 6 three minutes or five minutes' exposure will have you
 7 unconscious? So I think it gives us a take on that.
 8 Now, this was for one particular fuel package. For
 9 Grenfell in Phase 2, I have refined the datasets to
 10 reflect as far as I can the specific Grenfell fuel
 11 packages. So the numbers that I've used for the Phase 2
 12 work are a recalculation of this sort of picture, but
 13 more targeted at Grenfell.
 14 Q. Now, in the graph that we can see here, my question is
 15 really directed at the ratios of carbon monoxide to
 16 hydrogen cyanide.
 17 A. Yes.
 18 Q. Did they remain constant at 27:1 throughout the graph?
 19 A. Well, I'm not sure what the ratio was, approximately
 20 that in here, but what I'm saying is that for my
 21 examination of the Grenfell fuel mixes, I found that the
 22 ratios in the cladding and insulation, when the -- from
 23 the work that we've done, we believe that essentially
 24 all the polyethylene was burnt away very quickly in the
 25 fire at any one point on the exterior of the tower, and

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1 from the residues left behind, approximately half the
 2 mass of the Celotex insulation was burned away, which
 3 means that approximately equal masses, about 50:50 mass
 4 ratio of those two fuels burned.
 5 From my data from our BRE tests on the yields and
 6 compositions of these materials, I was able to arrive at
 7 an approximate ratio of carbon monoxide to cyanide
 8 I would expect to find in the smoke from that burning
 9 cladding and insulation mix, and I arrived at a figure
 10 of around about 26/27:1. That's important, because it
 11 means that anybody breathing that smoke of whatever
 12 concentration, the toxicity is going to be dominated by
 13 the carbon monoxide component, but that there's going to
 14 be significant contribution from hydrogen cyanide. So
 15 both are important, but it's dominated very much by
 16 carbon monoxide.
 17 Q. Right.
 18 A. I then did an analysis -- and it has to be very
 19 approximate -- for what I'd expect to find as the fuel
 20 load of individual materials in an individual flat. So
 21 the way I went about this was on the internet I found
 22 a local authority website of advice for removal people
 23 about what items you would expect to find in a typical
 24 flat or house, in terms of how many beds and what weight
 25 they were, how many cupboards, et cetera, et cetera. So

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1 I was able to come up with a kind of fire load contents
2 package for a flat, and then I related the composition
3 of those materials to, as far as I could, the materials
4 we'd studied in our BRE experiment, to work out the
5 approximate elemental composition, in terms of carbon,
6 nitrogen, hydrogen, chlorine, for flat contents, and the
7 yields, more importantly, and yield ratios of gases that
8 we'd expect from a typical total involvement. This is
9 for total involvement, a fully involved compartment fire
10 of an entire flat.

11 The important conclusion I came to was that the
12 nitrogen content is about 3% by mass of both the fuel
13 package 1, that burning on the outside of the tower, and
14 the contents, and therefore that the ratios of CO to
15 cyanide from any part of the contents burning at any
16 time are going to be similar to the ratios that we would
17 get from the outside burning materials.

18 Q. Right.

19 A. Therefore, the toxicity in that sense is going to be
20 very similar.

21 Q. Yes.

22 A. And also for the smoke as well.

23 Q. Yes, thank you. That's very helpful.

24 A. Sorry.

25 MR MILLETT: No, no, that's very helpful. We may see

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1 a little bit of that in the next figure.

2 Mr Chairman, I note the time, but there are one or
3 two further questions on this very topic that I would
4 like to finish off if we can before the break --

5 SIR MARTIN MOORE--BICK: Yes, all right.

6 MR MILLETT: -- if that's all right with the professor.

7 Professor, can we then turn down a page, please, to
8 page 42 {DAPR0000005/42} to look at figure 2, and that's
9 entitled:

10 "Calculated time to collapse from asphyxia at
11 different smoke visibilities (from Phase 1 report
12 Figure 18)."

13 A. Yes. So that is for the fuel package we have just been
14 looking at, not specifically for Grenfell, but very
15 similar kind of --

16 Q. That was really my question. That's the same mix, is
17 it, of carbon monoxide and hydrogen cyanide?

18 A. Yes, that's the mix that I used for the illustration
19 I put into my Phase 1 report. It's not specifically
20 tailored to Grenfell, but it's similar, similar ratios.

21 Q. So taken together, these two figures, figures 1 and 2 --
22 is this right? -- show how you have calculated the time
23 to collapse from asphyxia based on the visibility in
24 metres.

25 A. Yes, they're an illustration of the method, yes.

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1 Q. Exactly. So is a rough estimate that where visibility
2 is less than 1 metre, it will take roughly 20 to
3 25 minutes to collapse?

4 A. Yes.

5 Q. Yes, I see. And when it's less than half a metre, it
6 will take less than ten minutes to collapse?

7 A. Yes.

8 MR MILLETT: Yes, I see, thank you.

9 Mr Chairman, is that a convenient moment?

10 SIR MARTIN MOORE--BICK: Yes, it is, thank you very much.

11 Well, professor, as you were told earlier, we are
12 going to have a break during the morning. We will take
13 it now, so we will stop there. We'll resume, please, at
14 11.35.

15 As I'm sure you know, I think I said this to you on
16 previous occasions: while you're out of the room, please
17 don't talk to anyone about your evidence or anything
18 relating to it.

19 THE WITNESS: I understand, yes.

20 SIR MARTIN MOORE--BICK: All right?

21 THE WITNESS: Thank you.

22 SIR MARTIN MOORE--BICK: Thank you very much. Would you go
23 with the usher, please.

24 THE WITNESS: Thank you.

25 (Pause)

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1 SIR MARTIN MOORE--BICK: Thank you very much, Mr Millett.
2 11.35, please. Thank you.

3 (11.21 am)

4 (A short break)

5 (11.35 am)

6 SIR MARTIN MOORE--BICK: All right, professor, are you ready
7 to carry on?

8 THE WITNESS: Yes.

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

10 Yes, Mr Millett.

11 MR MILLETT: Yes, thank you, Mr Chairman.

12 Professor, can I please show you, then, next in the
13 same document, page 48 {DAPR0000005/48}, table 7, and at
14 the top of the screen there's a table entitled:

15 "Calculated approximate CO and HCN concentrations as
16 a function of visibility through smoke from flat
17 contents and exterior cladding and insulation."

18 You have set out there the visibility, the smoke
19 density, the flat contents divided between carbon
20 monoxide and hydrogen cyanide, and the cladding plus
21 insulation and the splits there as well.

22 Is it right that that shows you essentially what it
23 shows you, as you've described it; yes?

24 A. Yes, that's right, and this is specifically for those
25 Grenfell sets of data.

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1 Q. Yes.
 2 Just to pick a point up in the footnote, it says:
 3 "Includes 100% PE cladding and 50% PIR insulation."
 4 A. Yes.
 5 Q. That's I think an assumption that underlies all of your
 6 work.
 7 A. Right, no, well, actually, that was a very crude
 8 estimate based on my visits to the tower in 2018 or
 9 whenever it was, that about half the insulation had
 10 burnt away, but obviously all of the cladding was gone.
 11 But subsequent to that, Professor Stec's team have done
 12 an amazing and indeed very detailed survey of the tower
 13 to measure with some precision how much of that
 14 insulation has been burned away, and not only did they
 15 look at what remains on the tower now -- because one of
 16 the problems is things have changed a bit over the
 17 years -- they used the drone footage to validate what's
 18 there now with what appeared immediately after the fire.
 19 In fact, you can see on the drone footage the fire is
 20 still burning to some extent. So we have a pretty good
 21 picture of how much of that insulation was burned away
 22 and how much now remains.
 23 Q. Now, can we go to the next table down, same page,
 24 table 8, which runs over to page 49. Here is the table:
 25 "Estimated volume concentration ratios for mixed

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1 flat contents compared with those from cladding and
 2 insulation under two ventilation conditions."
 3 A. Yes.
 4 Q. Can you explain how you came to your findings that the
 5 relative concentrations of carbon monoxide and hydrogen
 6 cyanide are similar regardless of the origin, whether
 7 from exterior materials or flat contents --
 8 A. Yes, okay.
 9 Q. -- by reference to this table?
 10 A. I did refer to this a bit before we broke.
 11 Q. Yes.
 12 A. So, basically, if we take the cladding and insulation,
 13 because it's simpler in the sense that there are only
 14 two materials involved, I looked at, firstly, the
 15 elemental compositions of those fuels. So polyethylene
 16 is almost -- is entirely -- a very pure polymer, really,
 17 it's just carbon and hydrogen, so it has a very high
 18 carbon content, but nothing else, carbon and hydrogen
 19 only, whereas polyisocyanurate has ratios of -- well,
 20 has elements of carbon, oxygen, nitrogen and chlorine in
 21 it, and we measured those for our BRE work and then
 22 Professor Stec has re-measured them for the actual
 23 Grenfell materials. So those are the elemental
 24 compositions.
 25 But what perhaps -- as important as that is what

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1 happens when you actually burn these materials. So all
 2 these materials were burned in our BRE work on the tube
 3 furnace to measure the yields and concentrations of
 4 these gases, and hence we can look at the relative
 5 concentrations of smoke, CO and cyanide, when we burn
 6 these under controlled conditions, and for the cladding
 7 and insulation, that work has been repeated by
 8 Professor Stec on actual Grenfell materials. For the
 9 flat interior contents, that relies more on the general
 10 materials that we studied at the time of the BRE work.
 11 From that work, as I've said, we found that there were
 12 these certain ratios involved, and I've used those
 13 ratios for all my FED calculations that I've carried out
 14 for estimating the effects on occupants of flats,
 15 lobbies and the stair, and essentially the ratios -- so
 16 from what we were saying this morning earlier, if you
 17 know the concentration of one of these elements, one of
 18 these items, you can calculate the concentrations of all
 19 the others by these set of ratios.
 20 Q. Yes, thank you. Yes, I see.
 21 If we then turn to the next page {DAPR0000005/49},
 22 paragraph 176, and this is at the foot of the page,
 23 underneath the heading, "Method for estimation of
 24 exposure concentrations and effects on occupants in the
 25 flats, lobbies and stair".

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1 A. Yes.
 2 Q. And the first is from witness evidence.
 3 You say at 176 there:
 4 "From the descriptions of dense irritant smoke in
 5 the lobbies, and based on the general fire conditions
 6 I estimate that with almost zero visibility in the
 7 lobbies, the concentrations of CO are likely to have
 8 been high, in the approximately 5,000–10,000 ppm CO
 9 range with HCN in the approximately 190–380 ppm range
 10 based on the ratios between smoke density and gas
 11 concentrations shown in Table 8)."
 12 A. That's correct, yes.
 13 Q. That's the position.
 14 Then smoke density at that concentration -- is this
 15 right? -- would cause collapse or could cause collapse
 16 within three to five minutes for any person in the
 17 lobby?
 18 A. So inhaling those asphyxiant gases, that amount of
 19 carbon monoxide and that amount of cyanide, for three or
 20 four minutes would cause you to collapse, yes.
 21 Q. Yes. Three to four minutes?
 22 A. Well, it depends on where you are on that range, and
 23 obviously it's quite a wide range. Because one of the
 24 problems is if you can see 5 metres and then it goes
 25 down to 2 metres, you're conscious of that difference,

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1 but the difference between being able to see
2 10 centimetres and 5, you can't really judge. So all we
3 can say is it's very high.

4 Q. Yes, I see.

5 Can we please go, then, to page 50 {DAPR0000005/50},
6 the next page, and the next paragraph, where you say
7 this. This is paragraph 177:

8 "The main exposure to asphyxiant gases for the
9 majority of occupants escaping down the stair (having
10 left their flats before or very soon after the arrival
11 of the exterior fire) occurred while they were
12 descending the stair over periods of approximately
13 5–12 minutes depending on which floor they descended
14 from and their descent speed."

15 A. Yes.

16 Q. "Based on the descriptions of the smoke conditions, and
17 the fact that most of these occupants were able to
18 descend and walk from the Tower, the average CO
19 concentrations in the stair during these descents were
20 at moderate concentrations (in the range approximately
21 1000–2000 ppm CO and approximately 35–75 ppm HCN. This
22 first approximation estimate of the stair conditions is
23 based on the descriptions of the smoke conditions by
24 descending occupants. Evacuating occupants described
25 very dense smoke in the lobbies with no visibility. The

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1 majority of those evacuating successfully after
2 approximately 02:00 also described severe smoke
3 conditions in the stair with also with [sic] very poor
4 visibility. Some occupants could see nothing in the
5 stair but others reported being able to see lights in
6 the stair or their knees or a person in front of them.
7 Others described the visibility improving at lower floor
8 levels below approximately the 10th floor (see
9 Appendix A). Based on these accounts, on the developing
10 conditions and that occupants succeeded in walking down
11 I have made a preliminary estimate that this indicates
12 visibility approximately in the 0.4 to 1 metre range so
13 moderate concentrations of asphyxiant gases averaged
14 over the stair column shown in Table 7, enabling them
15 sufficient time to descend without inhaling a dose
16 causing collapse as indicated by Figures 1 and 2."

17 Now, first, can you explain how you estimated
18 visibility at between 0.4 metres and 1 metre in the
19 stairs?

20 A. So obviously this is very — I mean, the word
21 "approximately" should perhaps be in heavy type. These
22 are very, very approximate. This is the first
23 approximation that I'm making here. So all I'm asking
24 myself is: how bad was that smoke? Was it not too bad
25 at all, really quite bad or — is there any think of

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1 light, if you like, in there? And so simply based upon
2 what these witnesses are saying, I'm estimating we're
3 operating in this approximate range. It's pretty bad,
4 you almost can't see — in fact, you can't really see
5 ahead of you, but because smoke tends to be layered,
6 even in a stair — and some witnesses did actually refer
7 to this, sometimes they could see their knees or their
8 feet or, you know, the stair rail. So that to me means
9 we're operating in approximately this range of
10 visibility.

11 Q. And the variables in that range would be you've got to
12 take into account the differentials in concentrations in
13 the smoke layer, where you are in the staircase and the
14 time?

15 A. Yes.

16 Q. Yes.

17 Now, using that range, 1,000 to 2,000, how long
18 would it take, on your estimate, to cause collapse?

19 A. Yes, so one —

20 Q. Sorry, I should just add: assuming you start from a base
21 of no carbon monoxide or hydrogen cyanide uptake.

22 A. Yes, I think there's more of a worked example later on,
23 but, I mean, we're talking very approximately,
24 especially if we went back to that other figure.

25 A thousand parts per million you can walk through for

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1 about half an hour, and — what was it you said? —
2 2,000 would be about half that time. That's very, very
3 approximate and, of course, it varies on the individual
4 and what they're doing.

5 Q. And that's walking?

6 A. That's walking, yes.

7 Q. Right. And static?

8 A. Static, the ratio is 40% to 30% — oh, hang on a minute.

9 Static is quite a bit longer because you're breathing
10 less, so your uptake is about half that, so roughly
11 twice as long.

12 Q. Right. So you could, before incapacitation, spend
13 an hour in the stairs, or between 30 minutes and
14 an hour, depending on where you were on the range?

15 A. It might be helpful to go back to that diagram with the
16 smoke density. But, yes, something like that, yes.

17 Q. So can we go back to table 7, I think, page 48
18 {DAPR0000005/48}. Let's go to that. Table 7 at the
19 top. Is that the one —

20 A. No, I meant the figure with the curved graph on it.

21 Q. Ah. Well, perhaps we can do that shortly.

22 Can we then go to page 50 of your report
23 {DAPR0000005/50} and look at paragraph 178. There you
24 have derived more accurate estimations of exposure and
25 uptake of asphyxiant gases and effects on carbon

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1 monoxide, and you cover that, I think, in some ten
 2 paragraphs between 178 and 188. You have done that,
 3 I think, through an analysis of individual experiences;
 4 is that right?
 5 A. Yes. So here I'm looking at the condition of the people
 6 when they got to the bottom of the tower. So,
 7 for example, one of the first two people I looked at was
 8 Naomi Li and Lydia Liao, and they both walked down from
 9 the 22nd floor. It took them -- we have a fairly
 10 accurate understanding of when they entered the stair,
 11 just after they finished their 999 call, so they're one
 12 of the few examples where we have some actual objective
 13 time data, and they know the time they left the bottom
 14 of the stair, and so I estimate it took them
 15 11.5 minutes to walk down. So all the time they're
 16 walking down, they're inhaling carbon monoxide and
 17 a little bit of cyanide. So the state they're in, the
 18 condition they're in when they reach the bottom of the
 19 stair, gives me an indication of how much they've
 20 inhaled.
 21 Now, from the witness statements, Naomi said --
 22 I think she met some firefighters very close to the
 23 bottom of the tower, in the lower floors, and she felt
 24 that she would have been able to continue, walked out
 25 unaided, but they insisted on helping her, whereas her

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1 companion had sort of semi--collapsed, more or less
 2 collapsed, and had to be carried out. So you can see
 3 they were both on this cusp of collapse, which means
 4 that they were at about 30% carboxyhaemoglobin.
 5 So knowing that they were at 30% carboxyhaemoglobin
 6 and knowing how long they were exposed, I can calculate
 7 what the concentration of CO they were exposed to was,
 8 with some reasonable accuracy, plus or minus about 20%
 9 uncertainty.
 10 Q. Yes.
 11 Now, we'll come, I think, to that worked example
 12 shortly, but that's very helpful indeed as
 13 an introduction.
 14 Can I just explore with you the indicators that you
 15 have used to inform the more accurate estimates that you
 16 do in these paragraphs from individuals.
 17 Can we go first, please, to page 145 in this report
 18 {DAPR0000005/145}, or this part of your report,
 19 table 18, and that's entitled:
 20 "Blood [carboxyhaemoglobin] ranges with effects of
 21 increasing severity on exposed subjects and likely
 22 associated extent of post--exposure lung injury resulting
 23 from inhalation of irritant smoke soot particulates."
 24 Just to summarise that, am I right that it goes like
 25 this, if you start at the bottom of the table: roughly

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1 20 to 25% are occupants who were alert and active with
 2 no signs of dizziness, weakness or impending collapse,
 3 and they had accumulated blood concentrations of
 4 carboxyhaemoglobin of less than 20% to 25%?
 5 A. Sorry, I can't see where you're reading that from.
 6 Q. It's the last entry in the table?
 7 A. "Minor signs even in active subjects"?
 8 Q. Yes.
 9 A. Yes.
 10 Q. Yes. Then moving up -- I'm just walking you through
 11 this --
 12 A. Yes.
 13 Q. -- the next one up is occupants who were able to walk,
 14 but reported symptoms of dizziness, weakness or
 15 collapse, especially where one person is able to walk
 16 while a companion collapses, and requires assistance to
 17 evacuate. Those people had accumulated a blood
 18 concentration of carboxyhaemoglobin in the range of
 19 approximately 25% to 35%.
 20 A. So you're reading from the text but you're looking at
 21 the table, is that what --
 22 Q. I'm summarising the --
 23 A. Yes. So essentially if you're in that range, around
 24 about 25% to 35%, that's the sort of concentration where
 25 we're seeing people collapse if they're physically

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1 active, yes.
 2 Q. Yes. Then the next one up, 40 to 45%, there's an
 3 increasing incidence of collapse and loss of
 4 consciousness in resting subjects.
 5 A. Yes.
 6 Q. Yes, and the lung injury effects are also identified.
 7 A. Yes.
 8 Q. And at 45 to 50% roughly, you have got collapse, coma
 9 and death.
 10 A. Yes.
 11 Q. Then above 45% to 90%, unconscious and comatose until
 12 death, decreasing breathing. So this, I think,
 13 summarises what you told us before.
 14 At what level of blood concentration of
 15 carboxyhaemoglobin would an individual be likely to lose
 16 consciousness? I think you told us earlier it was 30%?
 17 A. So 30% for somebody who is --
 18 Q. Moving.
 19 A. -- walking quite actively along, and about 40% for
 20 somebody who is sitting at rest.
 21 Q. Yes.
 22 A. Or just walking slowly round a flat.
 23 Q. Yes, and you gave us the lethal threshold here, really,
 24 which is about 45%.
 25 A. Well --

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1 Q. Depending.
 2 A. Yes, I mean, I would normally say 50, but 45/50 you
 3 start to get — I have got a diagram to show this from
 4 actual data, but the survivability — very quickly. So
 5 if you look at survivability against dose, it sort of
 6 does that (indicated), where this is about 45 to 50%.
 7 There's a huge drop—off. These are people who have been
 8 rescued and survive, these are people who have been
 9 rescued alive but then go on to die, and the
 10 survivability percentage drops precipitously in this
 11 middle range here.
 12 Q. Right.
 13 Now, where an individual is known from the evidence
 14 that you've studied to have had limited exposure to
 15 asphyxiant gases in the flat before they left the flat,
 16 is it the case that any accumulated exposure to carbon
 17 monoxide can be attributed to uptake in the lobby and
 18 the stair?
 19 A. Yes. So the way to think of it is that it's
 20 a continuous process. As soon as you start to be
 21 exposed to carbon monoxide, inhale it, you're building
 22 up a dose in your body, as I mentioned earlier, and for
 23 the Grenfell occupants, that starts with them in the
 24 flats.
 25 Now, one of the — sorry, if I may just say —

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1 important aspects of the Grenfell incident was that
 2 after the lobbies filled with smoke, some people were
 3 then trapped in their flats for up to two hours, and
 4 during that period they nearly all — well, they all
 5 except one I can think of, I think, reported smoke
 6 leakage around their front doors, flat entrance doors,
 7 into their flats from the lobby. So this very bad lobby
 8 smoke is leaking into the flats, all right? So I was at
 9 pains to try to understand and estimate: how serious was
 10 that exposure during that period before the external
 11 fire's come round to their flat?
 12 My conclusion, having looked at all this data, is
 13 that they were able to limit their exposure quite
 14 successfully by sheltering in various rooms, opening
 15 windows on sides of the tower away from the fire, so
 16 that the dose they accumulated while in the flat was
 17 actually quite low, but it's all building up.
 18 Then they go into the lobby. If they hold their
 19 breath, they don't take any in, but if they inhale any
 20 of that bad lobby smoke, then they get a bit more of
 21 a spike, but it's such a short period, it's probably
 22 quite trivial, if they efficiently get across the lobby,
 23 and then the major exposure continues as they descend
 24 the stair. So it's the cumulative total by the time
 25 they've reached the bottom of the stair that we need to

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1 consider and where that's been acquired.
 2 Q. So one can break it up, I think, but is it right also —
 3 it follows from what you have said — that where
 4 an individual is known to have had some or perhaps
 5 significant smoke exposure before evacuating their
 6 flats, then the difference between their calculated
 7 uptake in the stair and the total uptake — is this
 8 right? — is going to represent the difference in the
 9 extent of their exposure while in the flat before
 10 entering the stair?
 11 A. Let me just clarify that, because it's quite important.
 12 So, basically, by looking at quite a lot of different
 13 people and doing these calculations, I was able to
 14 establish that the average concentration, which is the
 15 important figure, in the stair during this period — and
 16 we're talk mainly about the period between about 2.30
 17 and 4.00, the 50—odd people who came down during that
 18 period. So during that period, the concentration of
 19 carbon monoxide in the stair was of a moderate level,
 20 and by looking at the — lots of — a number of
 21 individuals, I was able to home in on a figure of
 22 1,800 parts per million as my best estimate of the
 23 average concentration of carbon monoxide in the stair
 24 during that period. Right?
 25 Now, that concentration means that by the time

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1 you — if you walk from an upper floor, you're going to
 2 be at sort of 20%—odd carboxyhaemoglobin just acquired
 3 in the stair by the time you reach the bottom. If
 4 you've reached 30 at the time you reach the bottom, then
 5 the difference is 10. Where did you get that 10? You
 6 had to get it while you were in the flat.
 7 Does that clear things?
 8 Q. Yes.
 9 A. So by being very — looking very closely at the acquired
 10 dose in the stair, which in itself was important, I was
 11 also able to deduce what the pre—exposure was in the
 12 flat up to that time.
 13 Q. In doing that, did you take account of uptake in the
 14 lobby?
 15 A. Yes. Now, for some of these calculations, I assumed
 16 that they took a few breaths in the lobby during this
 17 transition period as they crossed the lobby, and as I've
 18 said, I think the concentration in the lobbies were
 19 really high. But because it's still only — we're only
 20 talking about a couple of breaths or 10, 20 seconds at
 21 the most, the amount of dose acquired during this period
 22 in the lobby is very, very small in the context of the
 23 entire exposure. So if you came out of, say, a flat 3
 24 again and you went straight across, holding your breath,
 25 and got into the stair door of the stair, then you have

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1 inhaled nothing in the lobby. If, however, you took
2 a few involuntary breaths while crossing the lobby, even
3 though the conditions are really bad, because that
4 period is so short, it doesn't significantly add to your
5 dose. If, however, for some reason you become
6 disorientated and stay there for a few minutes, then
7 it's very serious.

8 Another point I would make is that there is a reflex
9 physiological response to inhaling smoke, which is that
10 you get involuntary breath—holding for a few seconds.
11 It's a physiological reflex. So if you walked out into
12 that lobby and took a breath, you would hold your
13 breath. You can't not do that. You can only do that
14 for a short period of time, but it would be long enough
15 for you to get across the lobby if you were taking
16 a direct, simple movement.

17 Q. Holding your breath, would that have a physiological
18 effect?

19 A. Well, anybody could hold their breath for a few seconds
20 and not collapse, if you like, yes. No. Sorry, I don't
21 understand the question.

22 Q. Well, if you're holding your breath, is there therefore
23 less oxygen in your system?

24 A. Yes, but we can all, you know, dive or hold our breath
25 for maybe a minute, so that's not a problem.

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1 Q. So it's immaterial? That's not —

2 A. Not for a few seconds, no.

3 Q. Was it also the case that you took into account the
4 variability presented by the fact that people coming out
5 of flats on different levels would have to travel down
6 the stairs for a greater or lesser distance?

7 A. Yes, and that showed up when I looked at this hospital
8 data.

9 Q. Yes.

10 A. Yes.

11 Q. I see.

12 Let's then turn to the applied example. If we go,
13 please, to page 51 — I'm so sorry, before we do that,
14 can I take you back, please, to page 42
15 {DAPR0000005/42}. You wanted to be shown the graph on
16 page 42, I think, in relation to my question about
17 distances.

18 A. Yes. So can you repeat the question?

19 Q. Well, I think my question was can you tell from this
20 chart how much —

21 A. You have to look at the previous — the two charts, the
22 one before that.

23 Q. Yes, let's go back a page to the top of page 41
24 {DAPR0000005/41}.

25 A. We really need them on the same page, which I've got ...

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1 Q. They're not. Page 41, figure 1.

2 A. If you go to page 6 of the document I prepared of my
3 graphs and things, they're both on the same page, so we
4 can see them.

5 Q. Oh, right.

6 A. Don't worry.

7 So all I'm saying is if you are exposed to — well,
8 I did do some calculations on people walking down the
9 stair, and at about 2,000 ppm you could — I think I —
10 I haven't got the figures in my head, but you could walk
11 for about 15 minutes. Now, I think the question you
12 were asking me was: if you were sitting, would you be
13 able to go longer, and you certainly would.

14 Q. Yes.

15 A. And because you are breathing about twice as much when
16 you're walking as when you're sitting, it should double
17 the time before you would collapse, approximately.

18 Q. Yes, thank you.

19 A. Does that cover it?

20 Q. It does.

21 A. I mean, I'd have to do some calculations to really
22 address it.

23 Q. That was the question and that's the answer. That's
24 very helpful.

25 Can I then turn, please, to page 51 of this document

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1 {DAPR0000005/51}, paragraph 189 and following. This
2 picks up on something you mentioned a few minutes ago in
3 your evidence.

4 Here you have explained your methodology through
5 an applied example.

6 A. Yes.

7 Q. I think this is right: there are two individuals who you
8 used who successfully evacuated from flat 193 on
9 floor 22. They entered the stair at 3.10 —

10 A. Yes.

11 Q. — and left the tower at 3.21.

12 A. Yes.

13 Q. So took 11 minutes to descend the stair from floor 22.

14 A. Yes.

15 Q. I think you have then estimated their exposure in three
16 scenarios.

17 A. Yes.

18 Q. And you have set those out —

19 A. Yes.

20 Q. — in sections 3.3.1, 3.3.2 and 3.3.3 of your report;
21 yes?

22 A. Yes.

23 Q. We can scroll through that. The assumptions in each
24 scenario are — let's have them up. Scenario 1, top of
25 page 52 {DAPR0000005/52}, is "Assumed free from exposure

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1 in the flat". Scenario 2 is "Inclusion of exposure",
 2 which is the foot of page 53 {DAPR0000005/53} -- yes?
 3 "Inclusion of exposure" --
 4 A. Yes.
 5 Q. -- "in the flat and lobby in addition to the stair".
 6 And then 3, assumption or scenario 3, I think you find
 7 at the top of page 57 {DAPR0000005/57} --
 8 A. I have included the other gases.
 9 Q. -- is the other gases, the asphyxiant gases, and you
 10 have provided a figure for each scenario, and I want to
 11 take each in turn.
 12 If we go back, please, to page 52 {DAPR0000005/52},
 13 and look at figure 3 --
 14 A. Shall I just talk you through this?
 15 Q. I was going to ask you to do that.
 16 A. So this is, if you like, well, a quasi-theoretical
 17 example. It does represent these two individuals who
 18 actually did perform this task, and it uses their actual
 19 exposure time, but for this particular scenario, as you
 20 can see from the beginning of that graph, the dots along
 21 the bottom are at 0. So I've assumed, which wasn't
 22 actually the case, for the purpose of this worked
 23 example that they had no exposure up to the time they
 24 left the flat. So they're in a completely smoke-free
 25 flat, and then they step out into the lobby, they cross

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1 the lobby, taking perhaps a couple of breaths, but the
 2 effects of that are trivial, as I explained, and then
 3 they enter the stair, and over 11.5 minutes they walk
 4 down the stair, and that's their main exposure. By the
 5 time they get to the bottom of the stair, they've
 6 reached about 30% carboxyhaemoglobin, they're in a state
 7 of near collapse; one's collapsed and one hasn't, in
 8 reality.
 9 So from my CO uptake calculation methods, I can
 10 calculate what carboxyhaemoglobin they would have
 11 acquired if the average concentration during that
 12 descent was at various levels. This is completely
 13 arbitrary, I just put a figure into my spreadsheet and
 14 I calculate their uptake for that particular scenario.
 15 Let's say I've guessed very accurately that they
 16 would be inhaling 2,100 ppm of carbon monoxide. So when
 17 I run that through the analysis, that then equates to
 18 the exactly correct, as it were, dose of 30% at the time
 19 they get to the tower (sic). So I would say if they had
 20 no exposure before entering the stair, and they still
 21 got to 30% at the bottom, then the average concentration
 22 would have to be somewhere around 2,100 parts per
 23 million in the stair.
 24 If we repeat the calculation for a similar but
 25 somewhat higher figure of 2,600, then we predict that

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1 they would have got to 40% carboxyhaemoglobin, and would
 2 have in fact collapsed quite a few floors up in the
 3 tower when they were at 30, about two-thirds of the way
 4 down, which they didn't do, so that can't be correct.
 5 Similarly, if you look at the pink curve, which is
 6 for 1,600 ppm, then they only get to 20% by the time
 7 they exit the tower and they would have been uninjured,
 8 unaffected, so we know it can't have been as low as
 9 1,600.
 10 So I think this gives you two things: it shows you
 11 the method I'm using, but it also gives you some
 12 indication that it's really quite accurate, you know,
 13 that we're not going to double or treble these gas
 14 concentrations, it's got to be somewhere in this range
 15 for it to be true.
 16 Now, this is assuming no prior exposure. Then the
 17 next example, I deal with the flat.
 18 Q. Yes. Let's go to that, which I think is scenario 2,
 19 page 54 {DAPR0000005/54}. That's what you're --
 20 A. Yes, if you blow that up a bit.
 21 Now, as I have said, by looking at a number of these
 22 cases -- and, in fact, in at least one of them, the
 23 occupants -- I've forgotten the name now. Was it
 24 Burton? One of these occupants, he stated in his
 25 witness evidence that their flat was totally clear of

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1 smoke up to the time they left. I think it's Pilar's
 2 husband I'm thinking of.
 3 Q. That'd be Nicholas Burton?
 4 A. Yes, Nicholas Burton. So Nicholas Burton said that
 5 their flat wasn't penetrated by smoke up to the time
 6 they left, so his only exposure was in the stair, and
 7 yet, by the time they reached the bottom, they were in
 8 this kind of almost collapsed condition.
 9 So by looking at a number of examples like this,
 10 I have honed in on the actual average figure for the CO
 11 in the stair as 1,800 parts per million. Right?
 12 So in this worked example you have in front of you
 13 now, this shows the concentration profile I've used for
 14 Li and Liao, taking into account their exposure in the
 15 flat.
 16 Now, I just need to explain what this shows.
 17 So the right-hand end of that chart, if we look at
 18 the CO concentration there, where the label says
 19 "2 escaping in stair" --
 20 Q. Just so people can follow this, that's the little black
 21 bar in the middle.
 22 A. Yes, so this represents the concentration with time of
 23 carbon monoxide that I've used for this analysis, right?
 24 So, as you can see, I have set that at 1,800 ppm. That
 25 covers the time period, the 11.5 minutes, during which

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1 they were actually descending the stair. From a number
2 of people, I've estimated that they were exposed to
3 1,800 ppm while descending the stair in reality in that
4 case.

5 Before that, they had a very short exposure to
6 a very high concentration in the lobby, which is why the
7 black chart — those figures go right up to the top of
8 the graph, but it's very short, so the dose they've
9 inhaled is very small. Before that, we've got the
10 concentrations of smoke and gases that I've estimated
11 very approximately that they could have been exposed to
12 while they were in the flat.

13 You can see that they were in the flat for — how
14 long? Well, about 1.30 to nearly 3 o'clock. Over
15 a long period of time they were in that flat, and they
16 were exposed to an increasing — we don't know the exact
17 shape of that profile of increasing, but it would have
18 been a gradual increasing profile of smoke and gases.
19 The smoke — this is shown in terms of visibility, so
20 the red graph is coming down, because the lower the
21 visibility, the higher the concentration of smoke, so it
22 goes in the opposite direction to the curves for gas
23 concentrations. I hope that's not too confusing.

24 Q. And that's, just to be clear, the mauve —

25 A. The red colour, the red —

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1 Q. The red is the visibility in metres.

2 A. Yes, so the red is the visibility. That's coming down
3 because there's more smoke.

4 Q. Yes.

5 A. In fact, yes, I've got — sorry, I've got — the pink is
6 the optical density per metre, which is the smoke
7 concentration.

8 Q. OD is optical density?

9 A. Yes, that's right.

10 Q. Right.

11 A. So you've got smoke concentration, cyanide concentration
12 and carbon monoxide concentration.

13 Now, those are arrived at by me just putting in
14 rough estimate numbers into my spreadsheet based upon
15 their description of the conditions at that time, and by
16 putting in that curve and running it right the way
17 through the analysis, I end up with a calculation, which
18 we'll look at in a minute, but I end up at a calculation
19 of the dose they've acquired from breathing all those
20 gases by the time they reached the bottom of the stair.

21 Now, these concentrations are constrained by the
22 dose they eventually reach. So if I put in a profile
23 like this and calculate the outcome, and I find that it
24 predicts they collapse at the top of the stair, then
25 obviously I put too much smoke and gases in the flat, so

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1 I have to re-run with a lower curve. If, on the other
2 hand, they haven't acquired enough, then I need to do
3 more. So it's a kind of iterative process that I use to
4 arrive at these numbers.

5 Q. Yes, I see.

6 A. So perhaps if we go on to the next graph.

7 Q. Yes, figure 5, page 56 {DAPR0000005/56}, please.

8 A. So this, then, from that gas profile I've just shown
9 you, this is their calculated FED uptake, and this is
10 just — I've just plotted the carboxyhaemoglobin on this
11 chart.

12 Q. 8.

13 A. So this is predicting the carboxyhaemoglobin in their
14 blood with time from the time they first took refuge in
15 flat 193 up to the time they walk out the bottom of the
16 tower, or stagger out the bottom of the tower is perhaps
17 a better way of putting it.

18 So the sharply rising part is the bit they've
19 acquired in the stair, which is constrained by all the
20 other people I've analysed on this figure of 1,800 ppm.
21 The bit before that is the dose they must have acquired
22 while in the flat in order for us to arrive at 30% at
23 the bottom. By constraining it by that outcome — and
24 I feel this is quite robust, quite strong — it means
25 that — and it's to some extent a surprising result to

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1 me — they cannot have inhaled more than about 9 or 10%
2 carboxyhaemoglobin over that entire period they were
3 sheltering in that flat from the smoke that had been
4 leaking in from the lobby. So they were able, by taking
5 various precautionary measures, to avoid a serious
6 exposure.

7 Now, I just briefly will say why this is very
8 significant, because when I worked for the Rose Park
9 Care Home Fire Inquiry in Scotland, and we reproduced
10 the actual incident there, one of the features of that
11 incident was that there was a very large fire in
12 a corridor which filled the corridor with about 10,000
13 parts per million of carbon monoxide, very similar to
14 what I believe was in the lobbies at Grenfell, and there
15 were a number of people who were in their rooms, behind
16 closed doors and in closed rooms, occupants, during that
17 incident. So they were in a similar situation. They
18 were in juxtaposition to these very high concentrations
19 in the lobby, but they were in their closed bedrooms,
20 and they were there for up to 50 minutes before they
21 were rescued. Those occupants, when they were rescued,
22 were comatose and in fact subsequently died. So even
23 though they were not in the same compartment, the same
24 room as the fire, over that period of time, sufficient
25 smoke and asphyxiant gases had leaked into their room,

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1 about 1,000 to 2,000 ppm concentration over a period of
 2 an hour or so, to result in them ultimately dying.
 3 So it could quite easily have been the case that
 4 something very similar could have happened at Grenfell,
 5 but it didn't, and this is my calculation demonstrating
 6 that fact.
 7 Q. Does it also give you an indication of the last or
 8 a point in time at which one could exit the flat on that
 9 floor at that time and survive?
 10 A. Yes. So I think it does show, in fact, quite -- that
 11 the time they left, just after about -- perhaps
 12 within -- just to go back to that particular case, then.
 13 So Naomi and Lydia were in the flat with the Choucair
 14 family, wasn't it? And they said in their witness
 15 statement that there was smoke in the flat building up
 16 over that period to some extent, and then as it got
 17 closer to the point that they left at about 3.10 -- so
 18 quite late leavers from that very high floor -- they saw
 19 that the fire was coming round, hadn't quite reached --
 20 the external fire was juxtaposed to their flat.
 21 Let me think. We're in flat 3. Oh, I was going to
 22 have a diagram, wasn't I? What happened to the
 23 diagram of Grenfell floor plan I was promised?
 24 Q. We can find that for you, professor.
 25 A. Hang on. If we go to page 13 of my --

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1 Q. We can have it up. Let's just show it on the screen,
 2 {BLAR00000009/12}.
 3 A. Yes, we want floors 4 to 23. We want that bit blown up
 4 really.
 5 Right. So we are in a flat 3, aren't we?
 6 Q. Just to say, this is from Barbara Lane's report.
 7 A. Barbara Lane's report, yes.
 8 Q. Phase 1 report.
 9 A. It's just a general floor plan.
 10 Q. Yes.
 11 A. So -- that's right. Forgive me, I'm just trying to
 12 orientate myself here.
 13 So in this particular case, the spread of fire to
 14 first reach that flat was coming along the south side of
 15 the tower, wasn't it?
 16 Q. Yes.
 17 A. So the first room to be affected was the first bedroom
 18 in this particular flat, or this column of flats. So
 19 what Naomi and Lydia saw was that the fire was about to
 20 come past the pillar in the middle there and was
 21 starting to -- was just about to attack that bedroom
 22 when they evacuated, and so the first room in that flat
 23 to be affected by the fire would be that bedroom. What
 24 they actually -- and the others were all sheltering,
 25 I think, in the living room, so they were able to avoid

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1 initially that exposure. But what Lydia and Naomi
 2 said -- or Naomi, I think, I'm thinking of her
 3 statement -- was that by this time, the hallway of that
 4 flat was filled with very, very dense smoke, and they --
 5 after their final 999 call just before about 3.09, they
 6 went to the bathroom to try to wet towels to cover their
 7 faces, and had quite some difficulty negotiating it to
 8 cross that hallway because of the density of the smoke,
 9 and they spent, I don't know, maybe 20 seconds or so
 10 getting these wet towels, and then they prepared -- they
 11 took one last breath -- that's right. They said, "We
 12 took one last breath from the only window" -- this would
 13 have been a west-facing window in the living room, where
 14 they could still get fresh air. They took a final
 15 breath of fresh air, and then they plunged through the
 16 smoke in the hallway of the flat, across the lobby and
 17 made it to the stair.
 18 So you can see that the conditions were quite --
 19 there was quite a lot of bad conditions in certain
 20 places, at least, in that flat at that time, and yet my
 21 calculations show that by sheltering in that living room
 22 and having access to an open window on the clear side,
 23 they were able to minimise their exposure up to that
 24 point in time, so that, unlike the occupants at
 25 Rose Park, they were in quite a good condition to be

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1 able to still walk all the way down the stair.
 2 Q. Yes, thank you.
 3 Can we then go back to your report at
 4 {DAPR0000005/57} and go to paragraph 219. There you
 5 have, "Scenario 3: Inclusion of other asphyxiant gases
 6 in the analysis", and at figure 6, a little lower down
 7 the screen, if we can have a look at that, scroll down
 8 to figure 6, this is the "Full FED analysis for Flat 193
 9 case", and you there set it out, taking into account all
 10 asphyxiant gases in addition to or including carbon
 11 monoxide.
 12 Could you just talk us through that slide, please?
 13 A. Allow me just ...
 14 (Pause)
 15 Yes, so this is for the -- yes, sorry.
 16 Q. This is the --
 17 A. I'm getting my head round this again. So this is just
 18 the third in the set, isn't it?
 19 Q. That's right.
 20 A. Yes, sorry. So this is still just for Naomi and Lydia,
 21 but this time I've included the full analysis, which
 22 includes the uptake of hydrogen cyanide, which you can
 23 see is the blue curve there, and -- what else have
 24 I got? Oh, yes, right. So as I mentioned earlier, the
 25 fractional effective dose calculation that we used for

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1 a mixed gas set includes individual terms for each
 2 individual gas and the summed terms assuming simple
 3 additivity for the fractions of the various gases.
 4 I think I explained that earlier . So in this curve here
 5 I've got the fractional effective dose for carbon
 6 monoxide on its own, that's the red curve; I've got the
 7 summed fractional effective dose for cyanide alone,
 8 that's the blue curve; and then I've got the FED in sum,
 9 which is the black curve, which is for those two gases
 10 added together, and also includes some consideration of
 11 the influence of carbon dioxide on their breathing, and
 12 also of reductions in oxygen from the fire, which in
 13 this case is trivial , so it doesn't really affect the
 14 calculation .

15 What this illustrates is that they were overcome
 16 essentially by carbon monoxide, that's the biggest term
 17 in this analysis , but you can see that, based upon the
 18 ratios that we talked about earlier , I have estimated
 19 that there would certainly have been some contribution
 20 from hydrogen cyanide from these burning materials. And
 21 just to remind you, to the extent that that may have
 22 come from the cladding and insulation, the only material
 23 in the insulation producing the cyanide is the
 24 insulation . The PIR Celotex insulation is the source of
 25 cyanide. But to the extent that some of this smoke may

1 be derived from burning flat contents, we're talking
 2 about things like upholstered furniture , which also have
 3 a high nitrogen content.

4 So it just illustrates here that the dominant gas
 5 here that's causing incapacitation is carbon monoxide.
 6 When I later went on to look at the hospital data, the
 7 doses of carboxyhaemoglobin that people are acquiring
 8 and being affected by is almost exactly what you'd
 9 expect to see from carbon monoxide alone. So the
 10 influence of cyanide is relatively minor, in my opinion,
 11 in this case.

12 Q. You say it was relatively minor, but you also say it was
 13 significant .

14 A. Yes.

15 Q. You say that in paragraph 225 on the next page
 16 {DAPR0000005/58}.

17 A. All right .

18 Q. Explain how it is significant , if you can.

19 A. Yes, okay. It's there, it's having an effect, and we
 20 shouldn't ignore it . Now, I might be getting into some
 21 complexities here. There is quite a difference between
 22 the way people are affected by cyanide and carbon
 23 monoxide. They're both asphyxiant gases. It's possible
 24 that they have a fractionally additive effect , although
 25 there's still some uncertainty about that. But one of

1 the key features -- and I've got a figure that --
 2 I might look it up in a minute -- I prepared that
 3 illustrates it -- is that if you're exposed to a low
 4 concentration of carbon monoxide and a very low
 5 concentration of cyanide, the cyanide has almost no
 6 effect . So, for example, if I expose you to less than
 7 100 parts per million of cyanide, then you can function
 8 inhaling that gas for about 30 minutes at 100 ppm. But
 9 if I double that to 200 ppm, you're going to be
 10 unconscious within three minutes. So the effects of
 11 cyanide are partly dose-related but partly
 12 concentration-related.

13 Now, because we're dealing here -- because of the
 14 ratio that I established earlier , and because we're
 15 dealing here with moderate concentrations of carbon
 16 monoxide, it means that the concentrations of cyanide
 17 are low enough that it doesn't have -- it's not really
 18 driving the outcome, but it is contributing to some
 19 extent.

20 However, and this is where I suspect it may have had
 21 more influence on the occupants of the 10th lobby,
 22 because whereas here we're talking about 1,800 ppm of
 23 CO, in the lobby we might be talking about 10,000 ppm of
 24 CO, and the cyanide is going up proportionately. At
 25 those ratios and those concentrations, cyanide becomes

1 a more significant actor in collapse. Not so much in
 2 cause of death, but in cause of collapse .

3 Quite a lot of my work has been directed at looking
 4 at the relative influences of cyanide and CO in fires,
 5 and from fires containing relatively high concentrations
 6 of cyanide, like furniture , upholstered furniture
 7 fires -- funnily enough -- well, not funnily enough --
 8 there has been in the last two days a press report of
 9 a prison fire in I think it was Ecuador or something,
 10 where the prisoners set fire to their mattresses, which
 11 are high nitrogen content materials, and I think there
 12 were 48 deaths. It happened in the last couple of days.
 13 So under certain circumstances, cyanide can be a very
 14 important driver of outcome. But in this particular
 15 case, because of the ratios , I believe it's having a --
 16 it's there, but it's having a relatively limited effect .

17 Q. Can you just explain why, when it comes to the lobby on
 18 floor 10, you say the cyanide is going up
 19 proportionately there?

20 A. I need to try and find this -- excuse me a moment.

21 Q. I may be able to help you with that. Is it at
 22 {DAPR0000003/24}?

23 A. That's the one, thank you. Thank you very much. Yes.

24 So these are the results of some experiments
 25 I conducted at Huntingdon. So this shows the

1 relationship between exposure concentration and time of
2 consciousness for exposed subjects. These were in fact
3 primates. The blue curve is for carbon monoxide, and
4 the little table there shows you the relationship
5 between inhaled concentration and time to incapacitation
6 and CT product, which is the exposure dose to
7 concentration.

8 So you can see that for these small animals, the
9 concentration of dose, the dose of carbon monoxide at
10 which they collapsed, became unconscious, was about
11 27,000 parts per million minutes, CT, for the first
12 figure there. So at 1,000 ppm carbon monoxide, the
13 concentration was 1,000, and after 26.6 minutes, the
14 subjects became unconscious, and multiply those two
15 figures together gives you 26,600, and it's just under
16 27,000.

17 When the experiment was repeated at 2,000, 4,000,
18 and 8,000 ppm, the calculated dose at which they
19 collapsed was always the same, as you can see there,
20 it's a constant, it's just under 27,000 ppm minutes. So
21 that's for carbon monoxide.

22 So dose and time are absolutely -- and concentration
23 are equivalent. If you're exposed to half -- twice the
24 amount for half the time, it has exactly the same effect
25 as half the amount for twice the time.

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1 Sorry, I've begun --

2 Q. Yes, I see. And do these two lines, the red and blue
3 lines, interact?

4 A. Yes. So the blue one is the CO. But in contrast to
5 that, if you look at the cyanide curve, it doesn't
6 follow that pattern.

7 Q. No.

8 A. And if you look at the little table on the top right,
9 I've calculated the two figures together. So if I get
10 exposed to 87 ppm of cyanide, then I've got 30 minutes
11 before I collapse, and you multiple those two figures
12 together you get 2,610. But if I'm exposed to 300 ppm,
13 I collapse after 0.9 of a minute, giving a figure of
14 270. So it's ten times more toxic, if you like, when
15 it's at that higher concentration.

16 Q. Yes. I mean, would you have -- let me try this slightly
17 differently.

18 A. Yes.

19 Q. If you were to eliminate the carbon monoxide from this,
20 therefore take the blue line out altogether, would the
21 line for HCN still look the same?

22 A. Oh, yes, so these are independent. They're not -- these
23 were different experiments.

24 Q. Right.

25 A. One set of experiments is on CO, one was done -- I just

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1 plotted them on the same chart.

2 Q. That's very helpful.

3 A. Yes, sorry about that.

4 Q. Now, can we then go back to your report, please, at
5 {DAPR0000005/58}, and this is your calculation now
6 part 4, paragraphs 229 to 233, where you've got the
7 "Forward calculation of carbon monoxide uptake for flat
8 occupants".

9 Is it right that you were able to use a number of
10 markers to inform your analysis for individuals in
11 different locations?

12 A. Yes.

13 Q. Yes. Did that include -- and let's just run through the
14 pointers here -- is this right: that where some
15 occupants in a flat successfully escaped and others were
16 unable to, you were able to measure the exposure and
17 uptake for all individuals in the flat as similar up
18 until the time that the individuals successfully
19 escaped?

20 A. Yes.

21 Q. Yes. Where you have 999 transcripts available for those
22 individuals or those present, you have relied on the
23 condition of the individual to estimate their level of
24 asphyxiant intoxication; yes?

25 A. Yes.

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1 Q. For example, if an individual was semi-conscious then
2 they're estimated to have had an accumulated dose of
3 about 40% carboxy?

4 A. Yes.

5 Q. For individuals who fell from the tower, their blood
6 carboxyhaemoglobin was fixed, I think, at the time they
7 fell?

8 A. Yes. So this is very sad, but actually it gives
9 an exact point in time and an exact dose at that point
10 in time.

11 Q. Yes, and you were able to use those levels, I think, to
12 calculate their exposure and the exposure of those who
13 were left in the flat at that time?

14 A. Yes.

15 Q. Yes. For those individuals who died in the flats,
16 I think you have used their post-mortem blood
17 carboxyhaemoglobin levels --

18 A. Where that was --

19 Q. -- where they were available --

20 A. Yes, yes.

21 Q. -- to estimate their exposure in the flat?

22 A. Yes, and then correlated, obviously, with any 999 call
23 transcripts, yes.

24 Q. Yes, thank you.

25 Now, you have also explained, on the next page

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1 {DAPR0000005/59} in section 4, that you have applied the
 2 "washout method" to evacuating occupants from the tower.
 3 Now, let's see if we can just have a bit more clarity on
 4 that ---
 5 A. Yes.
 6 Q. --- for those who have never heard of the expression "the
 7 washout method".
 8 You have described it at paragraph 234 at page 59,
 9 "Overview of method", but are you able to summarise that
 10 for us and just explain it in very simple terms?
 11 A. Yes. So if you have inhaled a certain dose of carbon
 12 monoxide after a point in time anywhere, and then you
 13 are taken out of that exposure and you're exposed to
 14 air, as soon as you're exposed to air, every breath you
 15 exhale contains some carbon monoxide that you're
 16 excreting from your body. You're washing it out of your
 17 blood by breathing it out. So the concentration
 18 remaining attached to your haemoglobin, the
 19 carboxyhaemoglobin, decays with time. The longer --- as
 20 you breathe, it gradually gets washed out until it's all
 21 gone.
 22 Now, the rate at which it's washed out depends upon
 23 the partial pressure of oxygen you're inhaling, because
 24 it's the oxygen that's driving it off your blood, and so
 25 we express this in terms of the half-life, the time it

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1 takes to get rid of half of the dose that's in your body
 2 at any point in time. So the half-life of carbon
 3 monoxide in the blood of a person breathing air is very
 4 long, it's about four and a half hours. So if you walk
 5 out of a tower with 30% in your blood, it's going to
 6 take four and a half hours to get down to 15% left,
 7 okay? Long time. But if somebody gives you oxygen to
 8 breathe from a face mask when you walk out the tower,
 9 which is 100% oxygen, then the half-life is about
 10 74 minutes, just over an hour. It varies a little bit
 11 with individuals, and I have obtained that figure from
 12 published studies on --- you know, in the literature, and
 13 if you look at the literature, you get various
 14 estimates. This was one recent publication looking at
 15 quite a large number of individuals, and they're all
 16 fairly close, but that's the figure I've used. So
 17 74 minutes half-life of somebody breathing oxygen from
 18 a face mask.
 19 Q. If we look at figure 8 on page 63 of this same part of
 20 your report {DAPR0000005/63}, there is a set of carbon
 21 monoxide washout curves for four persons evacuating from
 22 flat 183.
 23 A. Would it be helpful just to look at --- there were
 24 a couple of diagrams I put in just illustrating the
 25 basic calculation first, and then ---

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1 Q. We can do that. I think that's at page 60
 2 {DAPR0000005/60}. If we go to that.
 3 A. Here we are. So this was just to illustrate what I've
 4 just said, really.
 5 Q. Yes.
 6 A. So the upper example is sort of semi-theoretical, but
 7 it's based on actual data. So imagine there's somebody
 8 in the tower, they walk out and they've got 30%
 9 carboxyhaemoglobin in their blood. They stand outside
 10 for 20 minutes before anybody gives them oxygen, so
 11 that's the little red bit at the top of the curve, and
 12 they're washing out the CO, but very slowly. They're
 13 then given oxygen to breathe and the curve then becomes
 14 steep. After about 70 minutes, they arrive at hospital
 15 and somebody takes a blood sample, and that's the first
 16 red diamond on the curve, and then various samples are
 17 all taken at intervals. So I can fit a curve to those
 18 samples --- this is what I've actually done for these
 19 actual hospital figures ---
 20 Q. Right.
 21 A. --- and then I can back extrapolate that curve to the
 22 time they were first given oxygen, if I know what that
 23 is. So in this particular case, suppose I know they
 24 started at 20 minutes, then I can calculate that they
 25 had about 28/29% carboxyhaemoglobin at the time they

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1 started breathing oxygen.
 2 Q. Right, but ---
 3 A. Now, the lower curve is exactly the same thing, but in
 4 this case I've made a different assumption. So I've
 5 assumed that they came out of the tower from a lower
 6 floor, they had about 20% carboxyhaemoglobin, they
 7 weren't semi-unconscious or anything, so they weren't
 8 given any oxygen, but eventually they didn't --- they
 9 looked unwell, so they were taken to hospital. When
 10 they got to hospital, the same blood sample was taken
 11 and they were started on oxygen. So now my back
 12 extrapolation goes along that blue curve, because all
 13 the time before they got to hospital, they were only
 14 breathing air, and that means they could only have had
 15 about 20% carboxyhaemoglobin at the time they walked out
 16 of the tower. So that's just to illustrate the
 17 approach.
 18 Q. Yes, I see.
 19 A. So if we can --- do you want to move on to the next lot?
 20 Q. Yes.
 21 A. Sorry.
 22 Q. No, that's very helpful.
 23 The next lot is at figure 8 on page ---
 24 A. You were just going to ask about ---
 25 Q. Yes, page 63 {DAPR0000005/63}, and I think ---

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1 A. So this is for a set of actual Grenfell occupants —
 2 Q. Yes.
 3 A. — from flat 183.
 4 Q. Yes.
 5 A. I have anonymised them, so I can't remember who they
 6 were, but basically for these individuals, I have
 7 a number of blood measurements taken at hospital, which
 8 are shown by the enlarged dots on those graphs, so those
 9 are actual readings, and from those readings I've fitted
 10 curves to their individual washouts for those set of
 11 individuals, so it gives you some idea of the
 12 variability of this method.
 13 Now, the dashed line in there is the average
 14 74-minute half-life curve, if you can see that little
 15 dashed line. So you can see that some of the
 16 occupants — in the legend, I've put the calculated
 17 half-lives for these ones. So the dotted line is the
 18 published dataset curve factor.
 19 Q. That's the 74 —
 20 A. 74.
 21 Q. Yes.
 22 A. But 183, this individual, 183, you see their washout was
 23 to — fitted to their actual data shows a slightly more
 24 rapid half-life of just under an hour, 59.8 minutes. So
 25 back calculating their figure, it gives a figure of

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1 about 35% when they left the tower — well, when they
 2 were first given oxygen.
 3 And also 183B also had quite a rapid washout time.
 4 You'll notice that she had quite a high figure at the
 5 time she left the tower, but that individual was a heavy
 6 smoker. If you smoke cigarettes, you get quite a bit of
 7 carbon monoxide in your blood even before you're in the
 8 fire, so I think that's why her figure is a bit higher.
 9 But the green curve was actually for a child, if
 10 I remember rightly, or a young person, and you can see
 11 it's quite shallow. They've got quite a long half-life,
 12 a longer half-life. That person was asthmatic, and when
 13 they got to hospital they were in some distress. The
 14 hospital tried to put them on a ventilator, put them in
 15 an induced coma and put them on a ventilator, and the
 16 hospital records show that they had great difficulty
 17 ventilating this person because of their
 18 bronchoconstriction, and they had to use a particular
 19 special method of ventilation called CPAP, which is
 20 a sort of pulsed air method, and by doing that, they
 21 were able to overcome this problem and ventilate this
 22 person so they made a good recovery.
 23 But I think this curve shows that it's picking up
 24 the fact that this person was in an asthmatic state, and
 25 that's partly why the washout curve was shallower than

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1 it was for the other individuals. So it gives some idea
 2 of the individual variation.
 3 Q. Yes. Let's turn, then, on that topic, to individual
 4 characteristics and the effect of particular
 5 characteristics of the individual on the rate of uptake
 6 of asphyxiants.
 7 Let's start with children, but when I ask these
 8 questions and you answer them, please don't name any of
 9 the children if you can avoid it.
 10 A. I understand.
 11 Q. Now, you have explained, I think, that the rate of
 12 uptake of asphyxiant gases by infants and young children
 13 is about twice the rate of that of an adult, which would
 14 then hasten the time to collapse and death; yes?
 15 A. Yes.
 16 Q. You have given us a number of examples.
 17 First, does the increased rate of uptake for
 18 children apply equally between those who were sheltering
 19 in flats and those who were descending the stairs?
 20 A. In a word, yes. Let me just go through that.
 21 So, basically, for all animals, from mice to
 22 elephants, the amount of air you breathe each minute
 23 depends on the ratio of your body surface area to volume
 24 ratio. So the bigger you are, the less you need to
 25 breathe per unit body weight. That applies equally to

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1 humans. So the smaller the child, the more it breathes
 2 per minute per unit body weight. I mean, in theory,
 3 I could do more accurate calculations of this, but
 4 because of all the unknowns that were involved here, it
 5 didn't seem appropriate.
 6 As an approximation, a small child is going to —
 7 who is sitting in a flat — this is your question,
 8 sorry — breathing carbon monoxide, their uptake rate
 9 will be approximately twice that of an adult sitting
 10 next to them. When they walk — and this is quite
 11 important — down the stair, both will increase by
 12 a factor of two or so. So an adult sitting in a flat is
 13 breathing 10 litres a minute, 8 to 10 litres a minute,
 14 we're all doing that here now. If we start to walk down
 15 a stair fairly vigorously, that doubles to 20 or so, and
 16 the same would apply to the child, from their — double
 17 whatever they started at. Right?
 18 If, however, the child was carried, so say it was
 19 an infant and was carried down, then of course they
 20 continue to breathe at their resting rate, because
 21 they're not exercising, and therefore a small child, say
 22 a three or four-year-old child, who is walking down the
 23 stair through the smoke is at much greater risk than the
 24 same child were they being carried, say, by
 25 a firefighter or a parent.

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1 Q. Yes, that's very helpful.
 2 Is it likely in all cases where infants or young
 3 children were sheltering in flats with their parents
 4 that they would have lost consciousness and died before
 5 their parents?
 6 A. Yes. I mean, I think they certainly would have lost
 7 consciousness before the parents and almost certainly
 8 would have died before the parents, yes.
 9 Q. What about young teenagers, slightly older children?
 10 A. Well, it's in proportion, so still sort of say
 11 a 12-year-old, I would expect to see some evidence for
 12 that as well, but obviously it's in proportion.
 13 Q. Yes.
 14 A. I mean, it also applies to adults. So an adult with
 15 a large, heavy body mass would go for longer than one
 16 with a smaller body mass.
 17 Q. Let's then turn to the relevance of asthma. You have
 18 touched on that a moment ago.
 19 A. Yes.
 20 Q. Can I just show you first an article that you
 21 co-authored in 2016. That's at {DAP00000003}. Let's
 22 have a look at the first page first. It's entitled
 23 "Assessment of Hazards to Occupants from Smoke, Toxic
 24 Gases, and Heat".
 25 A. This is our chapter in the SFPE handbook, yes.

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1 Q. Yes, indeed. If we go to the foot of page 1, you can
 2 see, I think, an indication of that. It's the copyright
 3 of the Society of Fire Protection Engineers 2016.
 4 If we go, please, to page 27 {DAP00000003/27}, if we
 5 look at the second paragraph down on the left-hand
 6 column, in the penultimate paragraph break, you say:
 7 "Asthmatics and sufferers of other lung conditions,
 8 such as chronic bronchitis and reactive airways
 9 dysfunction syndrome, are particularly susceptible to
 10 bronchoconstriction on even brief exposure to very low
 11 concentrations of irritants, with distress, severely
 12 reduced aerobic work capacity, collapse, and death
 13 resulting, depending on the sensitivity of the
 14 individual and the severity of the exposure.
 15 "It is the objective of fire safety engineering to
 16 ensure that essentially all occupants, including
 17 sensitive subpopulations, should be able to escape
 18 safely without experiencing or developing serious health
 19 effects. Thus, safe levels for exposure of the human
 20 population to fire effluent toxicants must be
 21 significantly lower than those determined from
 22 experiments with uniformly healthy animal or even human
 23 surrogates."
 24 Now, are you able to elaborate on how asthma might
 25 have affected occupants of the tower during the fire?

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1 It's a very general question.
 2 A. Yes, right.
 3 Q. But focusing on how it might have affected their
 4 prospects of escape.
 5 A. With pre-existing conditions?
 6 Q. Yes. With asthmatics and other lung conditions.
 7 A. Yes. So we've got -- it's quite a complicated question.
 8 We've got various things -- two things happening here:
 9 one is a sensitivity to asphyxiants like carbon monoxide
 10 as a gas, and the other is the effects of irritants.
 11 Now, this material in this chapter here derived from
 12 a lot of discussions that we've had over the years in
 13 the ISO committee, where we're trying to produce
 14 standards in this area, and nearly all the work that's
 15 been done both on animals and human studies are based on
 16 otherwise sort of healthy individuals, and we have been
 17 trying to come up with the sort of numbers we've been
 18 discussing up until now on what sort of levels represent
 19 a danger of collapse for the average person and what
 20 might be a reasonable safety margin to put on a design
 21 constraint, which is partly what this chapter is aimed
 22 at.
 23 It becomes difficult, because the objective data
 24 available for challenged individuals is rather limited,
 25 and so there have been a lot of discussions on where

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1 this safety level should be put. I'm trying to address
 2 here the principle of it, and so what I'm saying here is
 3 that -- and I have some feeling for this, because I'm
 4 a severe asthmatic myself -- the irritants could
 5 precipitate an asthma attack. Irritant smoke could be
 6 inhaled and cause a severe bronchoconstriction, as in
 7 that example I showed you of the green curve earlier,
 8 which could, in itself, lead to some degree of
 9 incapacitation and collapse, even if there's no carbon
 10 monoxide present. So that's one issue that we have to
 11 think about.
 12 The other is susceptibility to carbon monoxide. If
 13 you're asthmatic and you inhale a certain dose of carbon
 14 monoxide, would you be more susceptible? Now, I would
 15 think all the risk is on the downside, that you probably
 16 would be, but for the Rose Park Inquiry, I had quite
 17 a lot of access to medical data for the deceased in that
 18 case, and I published a paper where I looked at the
 19 relationship between carboxyhaemoglobin at death and
 20 pre-existing health condition. These were all elderly
 21 persons, as I am myself now, who had quite a lot of
 22 pre-existing conditions. What I found was a very clear
 23 relationship, negative relationship, between the
 24 carboxyhaemoglobin in the blood at death and
 25 pre-existing heart condition. So if you had a severe

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1 heart or circulatory condition, then at death you had
 2 a lower carboxyhaemoglobin than one person who had
 3 a healthy heart. But when I did the same relationship
 4 for pre-existing lung disease, I didn't find any
 5 significant relationship. Quite surprisingly.
 6 So some of these individuals had quite severe
 7 pre-existing respiratory disease, and yet the
 8 carboxyhaemoglobin at death was not particularly
 9 different from those who did not have those conditions.
 10 So it's quite a complicated area, but I think
 11 a precautionary principle would say that you would
 12 expect to be somewhat more sensitive if you were
 13 pre-existing asthmatic or had some other condition.
 14 Q. Right.
 15 A. Does that help?
 16 Q. Yes. So just working this through, then, when it comes
 17 to carbon monoxide as an asphyxiant, your opinion, based
 18 on your research from Rose Park, was that, when it came
 19 to lung disorders, it had no effect on the --
 20 A. Limited effect, if any, yes.
 21 Q. What about hydrogen cyanide?
 22 A. Hydrogen cyanide? I think the true answer to that is we
 23 don't have any data --
 24 Q. Don't have any data.
 25 A. -- really, no.

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1 Q. When it comes to irritants, even in the absence of
 2 carbon monoxide, my question is, going back to the green
 3 curve --
 4 A. Yes.
 5 Q. -- does the presence of an irritant which constricts the
 6 airways and therefore --
 7 A. Slow the uptake?
 8 Q. -- slow the uptake?
 9 A. Yes, I've thought about this, and if it did anything, we
 10 would expect it to do so to some extent, but I would say
 11 it was going to have -- it would make a minimal
 12 difference.
 13 If we're breathing carbon monoxide as a pure gas and
 14 one person is asthmatic and one person isn't, during
 15 that uptake phase, I wouldn't really expect to see any
 16 difference. If we're breathing smoke with CO in it, and
 17 one is asthmatic and one isn't, then we might see some
 18 difference, but I don't think it would be a big factor.
 19 Q. Right.
 20 A. In the rate of uptake.
 21 Q. Why would the rate of uptake be different from the rate
 22 of washout in an asthmatic person?
 23 A. Good question. Oh, yes, well, because they're not --
 24 yes. So, right, let me just recap this and think
 25 through it.

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1 If you're breathing the pure gas during the uptake
 2 phase, and one is asthmatic and one isn't, I would
 3 expect no real difference. But if you're breathing it
 4 with smoke, then there might be a difference.
 5 Q. Right, I see.
 6 A. I'm not sure I've got the answer to this, but we do seem
 7 to be observing that that person -- that's right, sorry,
 8 yes. So if you had essentially an asthma attack while
 9 you were inhaling this smoke and CO, then it might slow
 10 it up, I think. And what we're seeing with that green
 11 curve is somebody who is washing out during an asthma
 12 attack, and it's the fact that, in inverted commas,
 13 they've got bronchoconstriction which is impairing their
 14 breathing and gas exchange outside the tower in that
 15 green curve. So, by inference, you might expect to see
 16 a similar phenomenon on the way up, if you were there to
 17 measure it.
 18 Q. Yes, thank you.
 19 A. I'm struggling a bit here. You're getting a little bit
 20 outside my experience of what's actually happened in
 21 these cases.
 22 Q. Fair enough.
 23 Now, coming back to the question of irritants, is
 24 HCN, hydrogen cyanide, an irritant as well as
 25 an asphyxiant?

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1 A. Not really, no. I mean, I think -- some people can
 2 smell it. I can smell it. Some people can't. It might
 3 have a very minor effect. But one of the reasons for
 4 the difference I showed you earlier in those two
 5 curves -- and there is a big difference -- is that
 6 carbon monoxide does not stimulate respiration. So if
 7 you're sitting here breathing, you'd breathe exactly the
 8 same whether there was carbon monoxide in the room or
 9 not. But cyanide is a very powerful respiratory
 10 stimulant, and in experiments I've performed on this,
 11 I found that if I exposed animals to, say, 150 parts per
 12 million of hydrogen cyanide, then their breathing went
 13 up by a factor of three within a couple of minutes.
 14 Q. Right.
 15 A. So that greatly enhanced the rate of uptake, and that's
 16 why they became unconscious so quickly. That's why
 17 there's a difference between --
 18 Q. That's very interesting.
 19 A. Sorry, I should have mentioned that earlier.
 20 Q. No, that's very interesting, because when I asked you
 21 about the two curves, the blue and the --
 22 A. Yes, that's the reason for the difference, yes.
 23 Q. So does that tell us this: if you have the proportions
 24 of hydrogen cyanide to carbon monoxide here that we had
 25 at Grenfell --

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1 A. Yes.
 2 Q. — the uptake of carbon monoxide was greater because of
 3 the presence of hydrogen cyanide than it would have been
 4 had hydrogen cyanide not been present?
 5 A. Right. So if you're breathing hydrogen cyanide at
 6 something around 50 to 60 parts per million, then the
 7 respiratory stimulus effect of that is really quite
 8 mild, so the effect it would have on CO uptake would be
 9 quite minimal. But if you're inhaling cyanide at, say,
 10 150 parts per million, then you get this massive
 11 increase in breathing and, as you say, if carbon
 12 monoxide is also present, it would enhance that.
 13 So if you have, for example, a person who is
 14 otherwise at rest, breathing about 10 litres of air
 15 a minute, and they start to inhale 150 ppm of hydrogen
 16 cyanide, then within a couple of minutes they might be
 17 breathing 30 litres of air a minute, and so if they're
 18 breathing carbon monoxide as well, you'll triple the
 19 rate of uptake, even though you're not walking or doing
 20 anything else. And that may indeed be why we think
 21 we're observing some degree of additivity between these
 22 two gases in terms of toxicity. The additivity may be
 23 as a result not of any particular systemic toxic effect,
 24 which is quite complicated; it may simply be
 25 a reflection of the fact that the cyanide is stimulating

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1 breathing and therefore the rate of uptake of the carbon
 2 monoxide.
 3 Q. Right.
 4 A. But it's quite a complicated area.
 5 Q. Yes, I was going to ask you, have you done any analysis
 6 on your outcomes based on carbon monoxide subtracting
 7 the presence of hydrogen cyanide?
 8 A. Well, what I'm saying is that for the stair cases that
 9 we've examined, where we've got the back—calculated
 10 hospital data, the relationship between the condition
 11 they're in and the carboxyhaemoglobin estimates in their
 12 blood, you can explain the outcomes for them pretty well
 13 entirely in terms of carbon monoxide.
 14 The other thing I would say about the cyanide story
 15 is that it's very — in certain circumstances, it can be
 16 quite serious in terms of time to collapse. As soon as
 17 you do collapse, your breathing drops right down, so
 18 that effect no longer occurs. I've measured this. And
 19 the uptake of cyanide tends, for that reason, to be
 20 somewhat self-limiting. It's quite a complicated story.
 21 So what we're seeing is that it probably does not
 22 contribute greatly to death. The main seriousness of
 23 inhaled cyanide in fires is in this rapid knockdown,
 24 rapid collapse, which then leaves you in the situation
 25 where you continue to inhale all these gases and then

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1 die.
 2 Sorry, what was the question again?
 3 Q. Well, the question was —
 4 A. I haven't quite answered it, have I?
 5 Q. The question was whether or not you had taken into
 6 account the stimulus —
 7 A. Oh, yes, sorry, so that was the point I was coming to.
 8 I would say for the stair occupants, we would seem to be
 9 able to explain all that we observe, and for the flat
 10 occupants, really, in terms of carbon monoxide, perhaps
 11 with a minor contribution from the fact the cyanide was
 12 there. For the 10th lobby, I feel it may have, for the
 13 reasons I've explained, had a bit more — some more of
 14 a significant contribution. But, still, CO is still
 15 a very important — the major driver, I think.
 16 Q. Right. So would you say that the stimulus effect of
 17 hydrogen cyanide on breathing was essentially negligible
 18 when it came to calculating the uptake of carbon
 19 monoxide, or did it have a material effect?
 20 A. I would say for the stair cases, for the moderate levels
 21 of CO and therefore low levels of cyanide, it had
 22 a limited effect, plus also you've got to remember that,
 23 in the stair cases, they're walking anyway, so they're
 24 already exercising, so it's getting quite complicated.
 25 As I say, where the lobby ones are concerned,

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1 I think it may have had some influence, and to some
 2 extent taken ...
 3 Q. What about the flats themselves before the time when the
 4 flame front attacked the outside of the particular —
 5 A. Negligible.
 6 Q. Can I just, in the few minutes before the break, turn to
 7 the impact of physical impairments on the prospects of
 8 escape.
 9 A. Yes.
 10 Q. Now, you have I think confirmed that your analysis of
 11 the potential for escape through the staircase would
 12 depend upon the occupants being able to descend the
 13 stairs and to do so in a time period shorter than would
 14 be required to accumulate the total threshold to
 15 collapse.
 16 A. Yes.
 17 Q. 30% or so.
 18 A. Yes.
 19 Q. If an occupant was impaired by a health condition from
 20 coming down the stairs at all or impaired from
 21 descending within the window of time before accumulating
 22 that incapacitating dose, would it follow that their
 23 prospects of escape were negated or reduced?
 24 A. Yes. It's quite complicated, this, isn't it? Because
 25 from the examples that I put in there, and from my own

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1 experience of trying to run down the tower, if you
2 remember, I managed to — I couldn't do it now.
3 I achieved 9 seconds per floor, when I did it in anger.
4 So if you're coming down the tower in smoke-free
5 conditions as a reasonably fit adult, you can obviously
6 travel down at quite a speed. The standard number that
7 we use is 1 metre per second coming down a stair, linear
8 travel.

9 If the stair is full of smoke, then you slow down,
10 and you'll notice that although they said that they
11 came — they thought they travelled quite rapidly,
12 I calculated that Naomi and Lydia were travelling at
13 about 30 seconds per storey compared to my 9, so they
14 were about a third the speed, and that fits in with what
15 we know about travel in poor visibility conditions and
16 smoke. There has been quite a bit of experimental work
17 on this, particularly in Japan.

18 So if you're travelling in dense smoke, you're going
19 to travel more slowly, and I've allowed for that, and so
20 for each individual I've looked at who survived, I've
21 looked quite carefully at how they describe their
22 descent, in terms of some said they ran down, some said
23 they came slowly, and I've tried to allow for that.

24 So if you have a disability but you can still
25 walk — and there were a number of examples of this in

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1 Grenfell, one particular individual I remember who was
2 assisted by another person to walk down — then if
3 you're walking through smoke, you may not be travelling
4 that much different speed than an able-bodied person
5 would, because you're all equally slowed down by the
6 dense smoke. Are you with me?

7 Q. Yes.

8 A. If, of course, you're unable to come down at all, then
9 obviously you're forced to remain in your flat.

10 Now, there was one particular case that struck me in
11 reading through the Grenfell witness statements — can
12 I remember the name? I'm afraid I can't — of a couple
13 where the lady was quite severely disabled, physically
14 disabled, and knowing that she would have no chance of
15 coming down the stair, as soon as she became aware of
16 the fire, she immediately, with her companion, got in
17 the lift and came down at a very early stage, and
18 therefore came down during smoke-free conditions and
19 survived. So she had a game plan, she had a plan B of
20 how to get out, if you like, which was extremely
21 effective.

22 Q. But dependent on the lift?

23 A. Dependent on the lift, yes, in her case, yes.

24 Q. Yes.

25 Now, working back a little, then, what was the

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1 maximum level of carboxyhaemoglobin blood saturation
2 that an average healthy individual could safely reach
3 while in the flat in order to exit the tower, assuming
4 30% or less carbon monoxide uptake and assuming your
5 reference point of 1,800 parts per million of carbon
6 monoxide in the stair column?

7 A. So we're talking really about this period after about
8 2.30 to about 4.00, when we had these conditions, so
9 I would say, you know, about 9 or 10% preloading before
10 you set off, yes, is about the — above that, you're in
11 trouble.

12 So, for example, in flat 205, Mr Neda fell from the
13 tower with 20% in his blood at the time he fell. If he
14 waited until that point and then decided to walk down,
15 following his son and his wife, there was a good chance
16 he would have not been able to walk all the way down, he
17 would have collapsed on the way down, because he's
18 preloaded 20. By the time he was halfway down the
19 stair, he probably would have reached the point of
20 collapse. You understand the point I'm getting at.

21 Q. Yes, I do, and the case you're referring to is

22 Mr Mohamed Saber Neda.

23 A. Yes.

24 MR MILLETT: Yes, thank you. Thank you very much.

25 Mr Chairman, is now a convenient moment for the

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1 lunch break?

2 SIR MARTIN MOORE-BICK: Yes, it is. Thank you very much.

3 We'll stop there, professor, for some lunch.

4 THE WITNESS: Thank you.

5 SIR MARTIN MOORE-BICK: We'll resume at 2 o'clock, please,

6 and again, please don't talk to anyone about your

7 evidence while you're out of the room. All right?

8 THE WITNESS: I understand.

9 SIR MARTIN MOORE-BICK: Thank you very much. Would you go
10 with the usher, please.

(Pause)

11 Thank you very much. 2 o'clock, please. Thank you.

12 (1.03 pm)

(The short adjournment)

13 (2.00 pm)

14 SIR MARTIN MOORE-BICK: All right, professor, are you ready
15 to carry on?

16 THE WITNESS: Yes.

17 SIR MARTIN MOORE-BICK: Good, thank you.

18 Yes, Mr Millett.

19 MR MILLETT: Yes, thank you, Mr Chairman.

20 Professor, I would like to turn next, please, to an
21 analysis of smoke and fire spread and the effects on the
22 occupants, and look particularly at the occupants in the
23 flat 6 group or column, and then the flats 1 to 5 group.
24
25

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1 Can we start, please, with {DAPR0000005/64}, your
2 report, at paragraphs 269a to g. Just summarising it
3 there, is it fair to say that you examined the
4 circumstances of the flat 6 occupants' awareness of the
5 fire and their actions in the context of the conditions
6 and the circumstances?

7 A. Yes.

8 Q. Why did you distinguish the flat 6 occupants'
9 circumstances and experiences from those in flats 1
10 to 5?

11 A. I suppose there were two reasons, really. One is
12 because obviously the flat 6 is where it all starts.
13 But having looked at flat 6 and then looked at what
14 happened subsequently in the other flats, I could see
15 a clear pattern of distinction, if you like, between
16 these two sets. The obvious point was that, as I said
17 this morning, as the fire came up the tower in the first
18 instance and arrived at each flat 6, and floors in
19 succession, the flat 6 occupants became aware of the
20 problem very, very quickly, often before the fire
21 arrived, often their smoke alarms went off in many
22 cases — I documented the different ways in which they
23 became aware in my report, I think — and they reacted
24 very quickly. Their first instinct was to go to the
25 kitchen to see what was happening, and they saw the fire

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1 arriving outside, by which time some of the flats were
2 already filled with smoke. They then essentially
3 grabbed a few very vital belongings or children or
4 whatever and rushed out the flat, and they were able to
5 do so because, when they opened the flat entrance door
6 to the lobby, they found the conditions in the lobby
7 relatively benign; there was either no smoke in the
8 lobby or, in most cases, quite thin smoke.

9 There were a couple of cases where the filling of
10 flat 6 was so rapid and severe that the occupants had
11 some difficulty in escaping, even in that very short
12 time. Quang Van Ho, was it, he and his wife got caught
13 in dense smoke in the lobby, and in his witness
14 statement, I read that he found himself trying to get
15 his wife to the front door so they could escape from
16 their flat, and having some difficulty opening the front
17 door, finding the latch and things to get out.

18 So it wasn't that simple, but he and all the other
19 flat 6 occupants all made it out reasonably well into
20 the lobby and then into the stair, and they were able to
21 do so because the conditions in the lobby and the stair
22 were smoke-free at that time. That's the point.

23 Q. Yes.

24 A. And that differs — now, of course, some of the
25 occupants of the other flats were coming out at the same

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1 time and followed the same pattern in the early stages,
2 but after the lobbies became filled with smoke, you see
3 that the pattern of response in the other flats is quite
4 different, in that people were staying there. Some of
5 them made multiple attempts to try and enter and cross
6 the lobbies but were repulsed each time, before they
7 either remained in their flat or finally got out.

8 Q. Yes.

9 If we could turn to the foot of the page
10 {DAPR0000005/64}, please, paragraph 272, you say this:

11 "From the times at which the occupants of each
12 Flat 6 left the Tower and other witness information
13 I have estimated the time at which they left their flat
14 to enter the lobby and stair. For the purposes of this
15 assessment I have estimated a descent time of 12 seconds
16 per floor, 10 seconds to reach the lobby from the flat
17 and 60 seconds collecting clothing and other belongings
18 once a decision to leave the flat has been made.
19 (Elsewhere in my report I have made more accurate
20 estimates of descent rates for individual occupants)."

21 Is it correct to say that your standard method —
22 which is my phrase, not yours, I think — for estimating
23 flat evacuation times has been to allow 60 seconds for
24 collecting belongings and children, perhaps, and other
25 things after deciding to leave, plus 10 seconds to reach

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1 the lobby from the flat, plus 12 seconds per floor of
2 time spent descending the stairs?

3 A. I did for that particular tabulation exercise I was
4 performing at that time.

5 Q. Thank you.

6 A. Obviously what I'm trying to do here is to use the time
7 of tower exit as one indicator to back calculate the
8 time that they entered the stair and hence left the
9 flat, but that's taken in the context of any other
10 information that's available, such as 999 calls, other
11 people or meeting other people. You know, it's quite
12 a complex exercise to estimate these times.

13 Q. Yes, and you go on to note that you have made more
14 accurate estimates of descent rates in particular cases.

15 A. Yes.

16 Q. Let's look, then, at page 66 {DAPR0000005/66}, please,
17 two pages on, figure 9.

18 A. Yes.

19 Q. You have "Estimated Flat 6 exit time in relation to time
20 of exterior fire arrival outside kitchen windows".

21 A. That's right.

22 Q. You say, if you go on to paragraph 279, just below
23 that —

24 A. Yes, at the bottom, yes.

25 Q. — if we could have that paragraph fully on the screen,

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1 this is what you say. You say:
 2 "An important finding is that many of the Flats 6
 3 occupants were able to move away from the fire at the
 4 kitchen and living room windows and to evacuate the flat
 5 into the lobby without experiencing significant or
 6 prolonged exposure to toxic smoke and without
 7 significant exposure to asphyxiant gases."
 8 A. Yes.
 9 Q. Now, in general terms, is your opinion that that meant
 10 that they had relatively low exposure --
 11 A. Yes.
 12 Q. -- to toxic smoke and gases in their motivations?
 13 A. Right. So, yes, what I'm saying is that, firstly,
 14 because they were moving away from the smoke towards --
 15 into a clear area, they were able to do so. Because
 16 they did it so quickly, obviously their exposure to
 17 anything else was very limited.
 18 Q. Yes. Does that contrast markedly with the situation in
 19 the flats 1 to 5, where the occupants were moving
 20 towards the smoke?
 21 A. Yes.
 22 Q. And felt unable to leave because of the dense lobby
 23 smoke?
 24 A. Exactly.
 25 Q. Yes.

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1 Now, if we go, then, please, to page 69 of this same
 2 part of your report {DAPR0000005/69}, paragraph 291, you
 3 say there:
 4 "My general finding is that smoke in Flats 6
 5 preceding arrival of the fire originated from the
 6 burning exterior materials on lower floors, was mainly
 7 associated with open kitchen or living room windows, was
 8 generally light (but sufficient to activate smoke
 9 alarms), and generally occurred shortly before the
 10 arrival of the exterior fire. The exception was Floor 9
 11 where smoke penetration was more significant and
 12 occurred well before the arrival of the exterior fire."
 13 Now, do you know why floor 9 was an exception?
 14 A. Not offhand, sorry.
 15 Q. Right.
 16 A. Just an observation that it was. I'd have to look at my
 17 notes to see what I'd said about that particular floor.
 18 Q. Let's then turn to the conditions in the lobbies.
 19 I think there were three stages of smoke development.
 20 Can we start, please, at page 73 of this self-same
 21 report {DAPR0000005/73}, paragraph 306. You say there:
 22 "The development of smoke in the lobbies was
 23 a continuous process, becoming progressively worse over
 24 a period of several minutes, then maintained for several
 25 hours during the fire."

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1 Then if you would go down the same page, please, to
 2 paragraph 308, you break up the development of smoke
 3 into three phases, three segments, and you say this:
 4 "a) Early development of a burning smell and thin
 5 general smoke haze (before approximately 01:10–01:25),
 6 resulting from slow infiltration and permeation through
 7 the building of smoke originating from the burning
 8 building exterior.
 9 "b) General smoke filling and poor visibility in the
 10 lobby:
 11 "i. On some floors a period over which the general
 12 smoke density increased over a period of a few minutes,
 13 the smoke colour darkened from grey to black, became
 14 more irritant and difficult to breathe, and the
 15 visibility decreased progressively to a few metres or
 16 less.
 17 "ii. On other floors a period over which a layer of
 18 dense black smoke was observed spreading over the lobby
 19 ceiling, then filling the lobby from the ceiling level
 20 downwards within approximately 1–2 minutes.
 21 "c) On most floors a time from which the lobby was
 22 filled with dense black smoke, which leaked into the
 23 adjoining flats around the entrance doors (and possibly
 24 via other penetration routes). When flat doors were
 25 opened occupants then reported zero visibility in the

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1 lobbies (for example 'could not see anything' [and
 2 that's a footnote to Branislav Lukic's statement] or
 3 'couldn't see ... a hand in front of my face' [and
 4 that's a reference to Oluwaseun Talabi's witness
 5 statement])."
 6 Now, those are the three stages.
 7 Are you able to divide those up into timing, do you
 8 think, to time slices?
 9 A. Can we just go back to the --
 10 Q. Go back a page to page 73.
 11 A. Yes.
 12 Right, so we've got the early period up to about
 13 1.25, depending on which floor you're on, I suppose,
 14 you know, because it's sequential with the floors.
 15 Q. Yes.
 16 A. So this is the period when, for example, on the top
 17 floor, the Neda family were becoming aware that there
 18 was something going on, that there was noise and there
 19 was smell and various things like that, and of course,
 20 as I think I talked about in my Phase 1 report, all
 21 buildings have to have an air exchange rate, you know,
 22 in order to keep the air fresh. So all buildings are to
 23 some extent leaky, and the fact that there's smoke
 24 flowing about, you're bound to get some degree of slow
 25 smoke penetration throughout a building in these kinds

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1 of circumstances, so this isn't particularly hazardous,
 2 but that's the first thing that certain people became
 3 aware of at various times.
 4 Then you've got the period after the fire has broken
 5 into flat 6 on each floor when it starts to come out
 6 from flat 6 into the lobby, and I think what I'm
 7 describing here was, I remember, two ways in which that
 8 might happen: one is that if the flat 6 door is open,
 9 then you get a fairly energetic plume, ceiling jet of
 10 smoke flowing out that's reasonably hot, or higher
 11 temperature, which comes out across the ceiling. So
 12 people who would observe that would say, "I saw a thick
 13 layer of smoke just under the ceiling". But underneath
 14 that, the conditions are clear. That layer then rapidly
 15 fills down as the smoke flows into the lobby, and,
 16 in fact, that was observed by a number of people, who
 17 saw this layer, went back into the flat, came back
 18 a minute later and then saw it was much deeper. So
 19 that's a sort of fairly energetic way in which the smoke
 20 is filling.
 21 Another scenario is where the flat 6 entrance door
 22 is closed for most of the time, and it's coming in
 23 through leakage, and then you get a more mixed darkening
 24 of the whole layer.
 25 And this is this period when this -- on floors where

1 rapid filling occurred, from my examination of the
 2 timing evidence, I would say that from nothing serious
 3 to quite serious dense smoke, we're talking about
 4 a period of a few minutes after the fire reaches the
 5 flat 6 on each floor.
 6 So on any particular floor, the fire gets to flat 6,
 7 flat 6 fills with smoke, the occupants leave. As they
 8 leave and open the door, and especially if the door
 9 doesn't close behind them, as happened in many cases,
 10 you then have rapid filling of that lobby with pretty
 11 dense smoke within a few minutes. So that would be --
 12 so the time period during which this is happening is the
 13 time of arrival of the exterior fire between about 1.15
 14 and 1.27 outside each flat 6, plus sort of three to
 15 five minutes on each floor.
 16 Q. What was the principal cause of the --
 17 A. Well, from the evidence that I've examined, which I'm
 18 talking about mainly witness statements, I would say
 19 this smoke is coming from the exterior, it's flowing
 20 into and through flat 6, and then out through the flat 6
 21 entrance doors and other leakage paths and filling the
 22 lobby from there. So I would say the main source of
 23 that smoke -- in the early -- in the initial stages,
 24 this is the point.
 25 Q. Yes.

1 A. So if we're talking about within, say, five minutes or
 2 so of the arrival of the exterior fire outside each
 3 floor, that smoke is coming from the exterior fuel
 4 packages 1 and 2, which is the exterior burning
 5 materials and the window surround materials and window
 6 ledges, the PVC window ledges.
 7 After, say, 1.49/2.00ish, then we start to see
 8 evidence from the outside of the building of large
 9 interior contents fires in certain flats on certain
 10 floors. So there appears to be quite a lag between the
 11 initial energetic exterior fire and when we're seeing
 12 considerable involvement of the flat contents.
 13 Q. Yes.
 14 A. And then when what happens, of course, the flat contents
 15 are substantially adding to that smoke.
 16 Q. Now, let's then turn on to page 78 {DAPR0000005/78}.
 17 I want to ask you about the status and effect of the
 18 flat entrance doors being opened or closed or unknown,
 19 and you have covered each of those.
 20 A. Yes.
 21 Q. If we start on page 78 with section 3:
 22 "Floors on which the Flat 6 door was stated to have
 23 been left open when occupants evacuated."
 24 A. Yes.
 25 Q. You say there at paragraph 316, just above that, so

1 you're dealing with the last part of the last section:
 2 "After Flats 6 occupants evacuated their flats the
 3 rate of smoke filling of the lobbies and time to
 4 developments of dense smoke conditions was highly
 5 dependent on whether or not the Flats 6 occupants left
 6 their flat entrance doors open as [they] left or whether
 7 they closed them. In the following I have summarised
 8 the timing and extent of smoke filling in three groups:
 9 those for which the occupants stated that they left the
 10 Flats 6 entrance doors when they left ..."
 11 A. That should be "open".
 12 Q. That should be "open", I was going to ask you. That
 13 should say "open".
 14 A. Yes.
 15 Q. "... those who reported that they closed their flat
 16 entrance doors; and those floors for which the status of
 17 the entrance door was not reported."
 18 A. Yes.
 19 Q. Now, if a flat 6 door was opened or left open, how did
 20 that affect the conditions in the lobbies?
 21 A. So if the flat 6 door was left open and if it remained
 22 open, obviously, then there was a clear path for smoke
 23 to flow out, particularly under the ceiling, as I've
 24 described, from flat 6 into the lobby.
 25 Now, of course, these had -- well, were designed to

1 have self-closers on them, and so when people left, even
 2 if they left them open, they were supposed to
 3 automatically close, but there seems to have been
 4 a problem with this.
 5 Q. Right.
 6 You say at 317:
 7 "When flat doors were held open or left open,
 8 (Floors 10, 11, 14, 16, 17, 20) and Flat 6 occupants
 9 left after their flats filled with smoke, the flow of
 10 smoke and filling of the lobby was rapid."
 11 A. Yes.
 12 Q. Those are the floors, I think, where you've identified
 13 doors being held open or left open.
 14 A. Yes.
 15 Q. When you say held open, do you mean held open
 16 permanently or held open --
 17 A. No, there were a couple of cases, or at least one I can
 18 think of, where, for a period of time, the occupant held
 19 the door open. There was one case where the occupant
 20 held the door open while he was waiting for his father
 21 to come out, and he described the smoke flowing from
 22 flat 6 out into the lobby with some force, such that he
 23 found it difficult to hold the door open while he waited
 24 for his father to come out. After his father came out,
 25 he managed to shut the door, and then the flow of

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1 smoke -- temporarily, at least -- ceased.
 2 Q. If the flat 6 door was closed, how did that, in turn,
 3 affect the conditions in the lobbies?
 4 A. Well, on some of the floors where the occupants said
 5 that they closed the flat doors -- perhaps we should
 6 look at my diagram in a minute --
 7 Q. Yes.
 8 A. -- there was a clear considerable delay in smoke filling
 9 the lobby, particularly on the -- these are mainly on
 10 the lower floors, but not all of them. The 18th floor,
 11 for example, was one where there was a good 20 minutes
 12 or so before the lobby became filled with smoke.
 13 Q. Yes.
 14 Now, let's just do the comparison. You referred to
 15 a diagram. I think we need to look at page 86
 16 {DAPR0000005/86} -- tell me if this is wrong,
 17 professor -- figure 11.
 18 A. Yes, so this is a plot I made.
 19 Q. Yes.
 20 A. So, as I say, there was a lot of work involved in this.
 21 I spent a lot of time looking at all the witness
 22 statements and trying to put time markers for all the
 23 statements they made to find the best estimate of the
 24 times at which people first reported either a thick
 25 layer under the ceiling or dense smoke according to the

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1 key I've got there. I've plotted those times in
 2 relation to the time of arrival of the fire outside each
 3 flat, which is the blue spots there, so that comes
 4 mainly from Professor Bisby's analysis of the time of
 5 spread up the tower, but I've also examined the
 6 photographs myself and, you know ...
 7 So the first line is the time at which the exterior
 8 fire arrives outside flat 6 on each floor, and the two
 9 dotted lines fitted after that are for two minutes after
 10 that and for five minutes after that, and for taking the
 11 right-hand side there, the sort of purple filled squares
 12 are the times when a witness reported dense
 13 smoke-filling of the lobby.
 14 Now, obviously, these are the latest times at which
 15 dense filling occurred, because you only can make the
 16 comparison if a person was there to observe it. So the
 17 fact that they observed it at a certain time but weren't
 18 there before it, it could have already preceded that,
 19 but it can't have been later, if you understand me.
 20 Q. Yes. So is an example of that floor 9 here, where
 21 you've got a differential in timing --
 22 A. Right, so --
 23 Q. -- from the time at which the exterior fire --
 24 A. Yes, so there's --
 25 Q. -- spread on the exterior cladding of 1.19 --

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1 A. -- 40 minutes or so there, so --
 2 Q. Exactly.
 3 A. So that was one example. I think that's one where the
 4 door was closed and the lobby remained relatively
 5 smoke-free for quite an extended period.
 6 Q. Yes. That wasn't a floor on which you found an open --
 7 A. No, I think it was closed, that one, yes.
 8 Q. Yes. But otherwise, the correlations are fairly closely
 9 grouped around about the five-minute mark, aren't they?
 10 A. They are, aren't they? Yes.
 11 Q. If we go, please, to paragraph 315 on page 78
 12 {DAPR0000005/78}, you say this, in the last four lines:
 13 "Critically, although most of the flat doors had
 14 been fitted with self-closing devices, many occupants
 15 reported that these did not work or had been removed, so
 16 that they had to manually close the doors to ensure they
 17 were shut."
 18 And you attribute a number of occupants' witness
 19 statements as the basis of your evidence there.
 20 My question is: how did the presence or absence of
 21 self-closing devices on the flat 6 entrance doors affect
 22 the conditions in the lobbies?
 23 A. The reason I have highlighted particularly flat 6,
 24 of course, is it's the first one to be affected, so it's
 25 the one that if -- were the first flats to be filled

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1 with smoke, and therefore, if the doors were open, the
 2 first ones to allow smoke to flow in quantity out into
 3 the lobbies. So that's why flat 6 is critical in this
 4 regard. But, of course, it would also apply to all the
 5 other flats later on.
 6 Q. Yes.
 7 If we go to the next page, page 79 {DAPR0000005/79},
 8 table 11, just picking that point up a bit, this is
 9 a table labelled:
 10 "Arrival times of exterior fire outside Flats 6,
 11 timings of lobby smoke filling after Flat 6 entrance
 12 door stated left open."
 13 A. Yes.
 14 Q. We have floors 10, 11, 14 and 16 there.
 15 A. Yes.
 16 Q. Then we can go over the page -- I'm sorry, this is not
 17 the end of the table -- scroll down to page 80
 18 {DAPR0000005/80}, you can see you have also got
 19 floors 17 and 20.
 20 If you go to page 82 {DAPR0000005/82}, you have got
 21 table 12, which I think is the flat 6s where --
 22 A. The occupants stated that they closed the doors, yes.
 23 Q. Exactly, so they're known, and that leaves, I think,
 24 five floors where the status of the flat 6 front doors
 25 was unknown.

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1 A. Yes.
 2 Q. I have counted them as 12, 15, 19, 22 and 23, those
 3 floors.
 4 A. Yes.
 5 Q. Yes? I think you have got that on page 84
 6 {DAPR0000005/84}, table 13, if we just go to that, which
 7 I think shows three of those floors, but you've also got
 8 others too; yes?
 9 A. Yes.
 10 Q. So you have got 12, 15 and 19 there, but there's also 22
 11 and 23, because we know that those doors were unknown.
 12 Are you able to form any view about whether the
 13 preponderance of the smoke in the relevant lobbies on
 14 those floors came from flat front doors being left open
 15 as opposed to being open briefly while the occupants
 16 went through them?
 17 A. On these ones where we don't know, do you mean?
 18 Q. On the ones where we do know. Well, on any of them, in
 19 fact.
 20 A. Okay. When -- as people -- there were some
 21 observations. As people actually --
 22 Q. Let me rephrase.
 23 A. Yes, carry on.
 24 Q. I think I have muddled you.
 25 In the cases where there was dense smoke in the

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1 lobbies, can you tell whether the preponderance of smoke
 2 on those floors was because the flat front doors were
 3 opened and left open as opposed to being opened to allow
 4 access and then shut again?
 5 A. I think we can to some extent, yes. So there were
 6 descriptions from the witnesses of smoke flowing out
 7 with them, as it were, as they left the flats, who then
 8 closed the doors, and some people quite clearly stated,
 9 you know, that they did this. The extreme example
 10 I just gave you was one where they felt this pressure of
 11 smoke forcing its way out into the lobby, but then
 12 succeeded in closing the door, and quite clearly stated
 13 that after they closed the door, the smoke flow ceased,
 14 and that at this point, although there was a bit of
 15 smoke in the lobby, it wasn't severe, and other people
 16 coming out of that floor at those times were able to
 17 move around without too much difficulty. So --
 18 SIR MARTIN MOORE--BICK: Forgive my interrupting you --
 19 A. Yes, sorry.
 20 SIR MARTIN MOORE--BICK: -- but this is all very much your
 21 assessment of the original evidence, is it?
 22 A. My assessment of the witness evidence, yes.
 23 SIR MARTIN MOORE--BICK: Yes.
 24 A. Yes.
 25 SIR MARTIN MOORE--BICK: I don't know how far you have taken

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1 into account what was said in the Phase 1 report
 2 about --
 3 A. Well, I have --
 4 SIR MARTIN MOORE--BICK: -- which reflects an analysis of
 5 quite a lot of the evidence.
 6 A. Yes. Well, I have, obviously, studied the Phase 1
 7 report as well.
 8 SIR MARTIN MOORE--BICK: Yes.
 9 A. But this -- I mean, I basically went to the original
 10 source for most of my --
 11 SIR MARTIN MOORE--BICK: All right, thank you.
 12 MR MILLETT: Let me see if I can just illustrate this
 13 differently, and then we can move on from this point.
 14 Can we please have up at the same time tables 11 and
 15 12. Now, table 11 is on page 79 and runs to 80
 16 {DAPR0000005/79-80}, that's the open door table, and if
 17 we have table 12 as well on the right-hand side of the
 18 screen, which is on page 82 to 83 {DAPR0000005/82-83}.
 19 They just about fit together. Those are the closed
 20 doors.
 21 A. Yes.
 22 Q. Just working through those, it's right, I think, that
 23 the time for the lobbies on the floors to fill with
 24 smoke from the time the exterior fire arrived at the
 25 relevant level was longer than on the floors where the

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1 doors were left open, except floors 8 and 21, where the
 2 smoke-logging of the lobbies occurred within two to
 3 four minutes of the flame front attacking the exterior
 4 on those floors .
 5 A. Yes. So from what I remember of this, there were -- the
 6 general picture was if people said they left the doors
 7 open, all those floors filled quite quickly. If people
 8 said that they closed the doors, on most of those
 9 floors, there was some delay. But there were a couple
 10 of floors where even though the doors were supposed to
 11 have been closed, we still got quite rapid smoke-filling
 12 of the lobbies, even though the doors were stated to
 13 have been closed.
 14 Q. And what was the explanation for that?
 15 A. Well, the only explanation I can suggest is that it was
 16 other leakage paths around those doors or through other
 17 penetrations between flats 6 and the lobbies --
 18 SIR MARTIN MOORE--BICK: Isn't one of the difficulties here
 19 that witnesses may say "I left the door open" or
 20 "I closed the door", and one tends to draw from that
 21 a conclusion that the door was either fully closed or
 22 fully open, whereas in fact it may have been somewhere
 23 between the two?
 24 A. That's possible, yes.
 25 SIR MARTIN MOORE--BICK: I mean, this is quite highly

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1 conjectural, isn't it?
 2 A. Yes, I'm only basing this on what the observations were
 3 of the outcome and what the occupants said they
 4 observed, but whatever else between those is, as you
 5 say, a speculation, yes.
 6 SIR MARTIN MOORE--BICK: Yes. Thank you.
 7 MR MILLETT: Against that caveat, what, in your opinion, was
 8 the source of the smoke in lobbies where the flat 6
 9 door-closers did work?
 10 A. Even where they were closed but it still filled up?
 11 Q. So let me give you an example. Page 83
 12 {DAPR0000005/83}, top of the page -- if we scroll down
 13 on the right-hand side, please, to the next page,
 14 page 83 -- you've got floor 8 with doors closed, and
 15 a time of filling up of three to four minutes.
 16 In your words, could you identify a reason for that
 17 behaviour in comparison with the other floors, where
 18 you've got 11 minutes or 12 to 24 minutes, as you can
 19 see?
 20 A. This was the flat, I think, where the occupant found, as
 21 I said, the smoke pushing and he had difficulty holding
 22 the door. He was holding a door waiting for his father
 23 to come. That's the one, I think.
 24 Q. Yes.
 25 A. So that may be some of the -- so that one. But, I mean,

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1 it's difficult to summarise this in a table, but from
 2 what I remember of reading the witness statements for
 3 all the witnesses on that floor, and I think from Patel
 4 himself and his father, their statements were that once
 5 they -- this allowed quite a bit of smoke to flow out
 6 during that period, but once they then closed the door,
 7 they observed the smoke flow to cease, at least
 8 temporarily, although that floor did subsequently fill
 9 up in time. So closing the door did dramatically reduce
 10 that smoke flow, once they did it.
 11 Q. Yes.
 12 Now, can we then turn to the question of the impact
 13 of lobby conditions on escape attempts, and you cover
 14 this at page 88 {DAPR0000005/88}, the same part of your
 15 report, paragraph 335. You say this:
 16 "On floors where there was rapid smoke filling of
 17 the lobbies, many occupants from other flats became
 18 trapped in their flats (or moved to other flats at an
 19 early stage and then became trapped)."
 20 We will come back to the question of evacuation
 21 through the lobbies in due course, but in brief terms,
 22 can you tell us: how did the differing smoke levels in
 23 the lobbies affect, first, the decisions of occupants
 24 trying to escape? And there are other things as well,
 25 but first of all the decision.

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1 A. Yes, I think we addressed some of this this morning. If
 2 you remember, I was raising this idea that we're sort of
 3 weighing influences on people, and it's a combination of
 4 physiological effects and effects of smoke, which is why
 5 I'm clearly concerned with this, is it's an effect of
 6 smoke, and the situation that those occupants found
 7 themselves in and their motivations as to how strongly
 8 they were motivated to want to escape or felt able to
 9 escape. And as I've explained, it's not a simple
 10 physical thing; it's the outcome of the balance of all
 11 these influences on the individual persons.
 12 But I read many accounts where, once people had
 13 initially stayed in their flats and then come and tried
 14 to open the entrance door to their flat with the
 15 intention of leaving, they were confronted by dense
 16 smoke and therefore closed the door and went back into
 17 the flat, and quite a lot of people -- and I actually
 18 prepared a table for this, which I have got with me
 19 I think somewhere -- they tried on multiple occasions,
 20 they made multiple attempts to try to get out and cross
 21 that lobby and go into that stair, and some of them
 22 three or four times were driven back by the conditions
 23 that they were facing.
 24 I think the term used in the Chairman's Phase 1
 25 report was "felt unable to", which is true, but I don't

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1 think it really quite conveys the enormity of the
2 situation these people were facing. Not only did they
3 have the immediate problem of the horrible conditions
4 they were facing in the lobby, but they also had the
5 question of: if I were to make it through this lobby to
6 the stair, what's it going to be like in the stair, and
7 what's it going to be like, if I'm on the 18th floor or
8 something, lower down? It could be much worse. There
9 could be a raging inferno in the stair, for all I know.
10 So all these things are going through one's mind,
11 obviously, and influencing activity.

12 In fact, a number of occupants said, having taken
13 that risk and got across and got into the stair, they
14 said, "If only I'd known, if only somebody had told me
15 that the conditions in the stair were nothing like as
16 bad as they are in this lobby, I would have left a long
17 time ago, you know, earlier in the fire".

18 Q. How did the differing smoke levels in the lobbies affect
19 the experiences of occupants in making attempts to
20 escape?

21 A. So, as I say, they open the door, they either didn't go
22 out or they went out, some of them went out and came
23 back, and they were then exposed to this difficulty in
24 seeing, obviously the fear of the situation, and the
25 irritancy of the smoke, the difficulty -- effects on

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1 their breathing, choking, these kinds of symptoms that
2 were very distressing and made it very difficult for
3 them to proceed, basically.

4 Q. Would you also take account, in assessing the balance
5 that you've identified, of particular individual
6 characteristics of the occupants of the flat, and I'll
7 give you a short list: so, first, physical impairments
8 such as asthma or mobility problems?

9 A. Yes.

10 Q. Cognitive impairment, such as a mental health
11 difficulty?

12 A. Yes.

13 Q. Age?

14 A. Yes, yes, it did affect some of them, yes.

15 Q. Pregnancy?

16 A. Well, a number of pregnant ladies did in fact go, but it
17 caused them problems, yes.

18 Q. Previous unsuccessful attempts?

19 A. Oh, yes. Well, I didn't actually categorise these, but
20 those are the sorts of things, yes, that could have
21 influenced their decisions, yes.

22 SIR MARTIN MOORE-BICK: These are all factual matters which
23 we investigated on a previous occasion, surely.

24 MR MILLETT: They are, Mr Chairman, but they're also --

25 SIR MARTIN MOORE-BICK: So what are you asking the professor

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1 to help us with that's a matter of his expertise?

2 MR MILLETT: Yes, the professor has given expert evidence
3 based on his expertise of not only the physical and
4 toxicological effects of smoke, but also the
5 behavioural, and these are simply aspects of --

6 SIR MARTIN MOORE-BICK: But they're all going to be manifest
7 in conduct or people's description of what they saw or
8 felt or did, which we've largely covered, I think.

9 MR MILLETT: Yes, but what I'm seeking to elicit is the
10 expectations of somebody confronted with thick smoke.

11 Would it make a difference to the way they reacted
12 and thought about or weighed the decision whether to
13 cross the lobby that they were old or pregnant or had
14 made previous unsuccessful attempts or, coming to my
15 last one, had children in the group?

16 A. Yes. Of course, the other factors I mentioned earlier
17 this morning is: is the exterior fire coming in through
18 the window at this time or not? Another big --

19 Q. Yes, which would be a propulsive thing.

20 A. Yes, exactly.

21 Q. Yes.

22 Now, let's turn to the stair. Page 92
23 {DAPR0000005/92}, paragraph 352, which continues over on
24 to 93. On page 92, you have a long paragraph here, 352,
25 which I'm not going to read in its entirety to you, but

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1 I think you identify four stages of toxic smoke
2 development in the stairs, and I just want to run
3 through them, just to get you to confirm it.

4 The first is (a), the period before there was any
5 smoke in the lobbies or stair or any light smoke or
6 a burning smell; yes?

7 A. Yes.

8 Q. And then the second one at (b), a period where the stair
9 was clear or had only some smoke in it, but where the
10 lobbies were filling with smoke.

11 A. Yes.

12 Q. Third, I think, at (c) is where there was obvious smoke
13 in the stair with visibility still approximately a few
14 metres. Smoke was irritant but escapees could escape
15 without experiencing dizziness or collapse, but that the
16 smoke in many of the lobbies was dense.

17 Then the last one, over on page 93 {DAPR0000005/93},
18 352(d), dense smoke in the stair, limited or zero
19 visibility, smoke highly irritant, escapees might have
20 felt dizzy, weak or lightheaded, and, in the event, some
21 collapsed and were rescued or died in the lobbies or the
22 stair. But you go on, I think, to say in the middle of
23 that paragraph:

24 "During this stage escape via the stair from all
25 floors was hazardous, but still possible."

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1 Are you able to — and I think you have — summarise
 2 for us the time slices into which each of these four
 3 descriptions —
 4 A. I'll try, yes. Let's go back a page.
 5 Q. Let's go back to page 92 {DAPR0000005/92}.
 6 A. Yes. So the period before there was any smoke in the
 7 lobbies or stair or only light smoke. So we're talking
 8 about the time before the lobbies were filling with
 9 smoke, and at that time the stair was also clear of
 10 smoke. Then you've got the stage — so that would take
 11 you — well, it depends on the floor you're in, but it's
 12 taking you up to the period between about 1.20 to 1.30
 13 kind of thing, depending on the floor level. So during
 14 this early period, before there was smoke in the lobbies
 15 and the stair, obviously it was relatively — there was
 16 no obstacle to getting out.
 17 Then you've got a period when, as I described
 18 a minute ago, the lobbies were filling with smoke. So
 19 this is after 1.25 to 1.30, when the lobbies are filling
 20 with smoke, but the stair is still pretty well smoke —
 21 there's only light smoke in it. So some people were
 22 having difficulty crossing the lobbies, but once they
 23 got into the stair, things were not too bad. I suppose
 24 that period sort of ends when — I'm trying to think
 25 what (c) is going to be, but we're moving up towards the

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1 sort of Petra Doulova point, where the last people who
 2 were able — who went through dense lobby smoke to get
 3 into the stair, but once they were in the stair they
 4 were facing reasonably benign conditions and were able
 5 to escape.
 6 What was (c)?
 7 Q. (c) is, if we go to 92, a period when the smoke in many
 8 lobbies was dense. Go back to (c).
 9 (Pause)
 10 A. Yes, I think this is, from memory, around about the time
 11 leading up to about 01.40 to 01.50ish, the last few
 12 people to come down. Now, I paid particular — and it's
 13 all detailed in my stair appendix. But the point I'm
 14 trying to get at is there was a period when people were
 15 able — although there was some smoke in the stair,
 16 people were able to descend without much difficulty and
 17 continued down and came out.
 18 Then there was a period when there was starting to
 19 become significant smoke in the stair, and there's some
 20 quite good descriptions. There's one particular
 21 description, for example, of somebody who came into the
 22 stair and said he observed people coming in, opening the
 23 lobby doors above and below, and smoke flowing into the
 24 stair, and how the stair was starting to darken.
 25 There was one particular case which I found

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1 instructive of a couple — and, again, this is this
 2 mixture of behaviour and physiology. So you've got
 3 a couple, I think they had a child with them as well,
 4 who — this is at a relatively early stage — came down
 5 the stair, and they found a lot of smoke coming into the
 6 stair around about the 4th floor level, where the
 7 firefighters had got the doors open for firefighting
 8 purposes, and so there was a — so the stair was
 9 reasonably clear of smoke for the first few floors they
 10 descended, and then they came across this dense patch.
 11 The husband was willing to carry on, walk through this
 12 smoke, he wasn't repelled by it, but the wife was
 13 concerned and was too frightened to go through it,
 14 wouldn't go through it and called him back. So they
 15 both went back up to their flat. I'm using this as
 16 an example of, again, this complicated interaction
 17 between the toxicity, the physiology of the smoke, how
 18 it interacts with other aspects.
 19 SIR MARTIN MOORE—BICK: Just so we understand clearly, are
 20 you saying that the smoke had an effect on people's
 21 cognitive ability, or are you just saying —
 22 A. No, no, no.
 23 SIR MARTIN MOORE—BICK: — people recognised that there were
 24 pros and cons — I mean, we might all see that people
 25 might see there were risks of staying and risks of going

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1 and they had to balance them up, but I'm not sure
 2 whether you're saying as a toxicologist that the
 3 existence of certain levels of smoke actually affects
 4 their reasoning?
 5 A. I'm with you. I understand the question. No, I'm not
 6 saying it affects their reasoning ability; I'm saying it
 7 affects their decision-making processes based upon the
 8 physical symptoms they're suffering or experiencing. So
 9 the fact that the smoke is irritant, for example, may be
 10 more of a deterrent for them continuing than if it was
 11 non-irritant, or if this was thin or thick.
 12 SIR MARTIN MOORE—BICK: But that's just a matter of the
 13 facts of the situation, isn't it? I mean, people are
 14 put in an impossible situation, there are strong
 15 factors —
 16 A. Yes.
 17 SIR MARTIN MOORE—BICK: — inducing them to try and escape,
 18 and there are other quite strong factors — perhaps
 19 overwhelming factors — telling them that they shouldn't
 20 try and go through dense smoke, and this is one of the
 21 dilemmas that unfortunately they were facing.
 22 A. I think, yes, but part of, if you like, my dilemma as
 23 a toxicologist looking at this is to say: what is the
 24 relationship between the visibility, the density of the
 25 smoke and its other chemical toxicological attributes,

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1 and people's willingness or ability to move.
 2 Now, one of the things that we can measure fairly
 3 objectively is walking speed in smoke as a function
 4 of — and people have done this in volunteer studies —
 5 the smoke density and irritancy. So there was a famous
 6 body of work by Professor Jin, a Japanese professor, who
 7 got volunteers to walk down a smoke-filled corridor and
 8 measured their walking speed as a function of smoke
 9 density and came up with a nice relationship. He then
 10 repeated the experiment with smoke — and this was
 11 sort of theatrical smoke, so it was non-irritant. He
 12 then repeated the experiment with smoke from a bee
 13 smoker, actually, he used, which is very irritant wood
 14 smoke, and he found that, at a given physical density,
 15 optical density, people were much more inhibited,
 16 you know, at a much lower density for the irritant smoke
 17 than they were for the non-irritant smoke.
 18 So that's a sort of — now, that's something that's
 19 fairly easy to measure, in the sense that you're
 20 measuring a physical property of movement speed, but my
 21 point here is that even more serious in its effect on
 22 the outcome is the effect of these phenomena on people's
 23 behavioural response, and it's not a simple — it's
 24 a serious question: what's the relationship between
 25 whether somebody will — or of a population of people,

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1 how many of them will be able to get out and how many
 2 won't as a function of the properties of the smoke is
 3 a serious toxicological question. But unfortunately the
 4 answer, as I'm trying to explain, is a mixture of
 5 behavioural and physical phenomena and so, therefore,
 6 quite difficult for us to address, in a way, but it's
 7 nevertheless a real problem, a real issue.
 8 In the case of this particular couple, just to
 9 finish the story, having gone back to their flat, the
 10 firefighters then came to assist them to evacuate, which
 11 then gave them the confidence to come down, by which
 12 time also some of this smoke had partially cleared and
 13 they were able to carry on.
 14 So I'm just raising this — I mean, I think it has
 15 very serious consequences for the outcome of any design
 16 or any, you know, situation like this, and we have to
 17 understand that these factors are having a profound
 18 effect on the outcome. That's my point, really.
 19 Does that help? Sorry.
 20 SIR MARTIN MOORE-BICK: Yes, thank you very much.
 21 MR MILLETT: Yes, thank you.
 22 Now, can I then turn, please, to — well, first of
 23 all, was it your finding, or your conclusion, rather, on
 24 the basis of the material you studied, that the risk of
 25 collapse was highest from 2.00 am, in other words the

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1 fourth stage, stage (d)?
 2 A. Well, obviously we went through a lot of things this
 3 morning. I think a key time point where — I keep
 4 coming back to Petra Doulova, don't I? The time that
 5 she came out and her companion was the end of the period
 6 when the conditions in the stair could be described as
 7 almost benign, in the sense that her uptake of
 8 asphyxiant gases was absolutely negligible, so there was
 9 no real hazard of collapse in the smoke up to that time.
 10 But after — then we have this gap where nobody comes
 11 out. When we return to the situation where people are
 12 now starting to come down the stair again, and
 13 Fadumo Ahmed is the first one that comes down after this
 14 period, we're now in a situation where the stair is
 15 definitely hazardous, we have something like 1,800 ppm
 16 of CO in the stair, and so if you spend too long in
 17 there, then you will collapse from the effects of the
 18 stair, and, as we discussed, if you have already
 19 preloaded with quite a bit of carbon monoxide, you're
 20 also going to be in danger of collapse.
 21 Does that answer your question?
 22 Q. Yes, I think it does.
 23 If we go to paragraph 375 {DAPR0000005/96}, I think
 24 that covers it, although it doesn't refer to Ms Doulova.
 25 A. Branislav Lukic —

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1 Q. Is that her partner? No.
 2 A. Doulova was the last one to come down from a high floor
 3 level. Was it 20th? I can't remember exactly, but it
 4 was a high floor level.
 5 Lukic, they came down from the 11th floor, so they
 6 were coming down from — starting from a lower point in
 7 the stair, but they experienced very severe conditions
 8 in the lobbies —
 9 Q. Yes.
 10 A. — at that time, but they still had relatively benign
 11 conditions in the stair up to that point.
 12 Q. Right. I think if we go to the foot of 95
 13 {DAPR0000005/95}, though, paragraph 371 you say there:
 14 "The last two occupants to descend in the stair from
 15 an upper floor ..."
 16 A. Yes, there we go, yes.
 17 Q. "... before dense smoke filled the stair were
 18 Petra Doulova and Leroy Augustus (20th Floor, Flat 174).
 19 They entered the stair approximately 01.36."
 20 So is that the key point in time?
 21 A. Well, yes, they were the last people to come down, as it
 22 was, it was the 20th floor, before this hiatus of a good
 23 half hour when people stopped coming down.
 24 Q. Yes, thank you.
 25 Let's then turn to toxicology, and I want to ask you

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1 about the impact of irritant smoke on behaviour.
 2 Now, some of this, I think, you're discovered in
 3 your exchange with the Chairman in the last five or
 4 ten minutes or so, but let's see if we can just pin this
 5 back to your report a little bit more closely.
 6 If we go to your Phase 1 report, you have a table in
 7 annex A, and that's at {DAPR000001/102}.

8 A. Yes, and this table appears in various, if you like,
 9 standard or semi-standard documents. So it's a guide,
 10 really, to -- and it's intended for designers to look at
 11 the relationship between, in this case, the experiments
 12 and the work I was referring to about smoke visibility
 13 and walking speed. And then there were two very --
 14 what's the word? -- important studies that were made
 15 a long time ago, one in England and one in the
 16 United States, of the relationship between smoke density
 17 during fire incidents and, again, occupant behaviour, as
 18 to whether people would be willing to continue walking
 19 through the smoke in order to escape or whether they
 20 would turn back. Summarising quite a lot of
 21 information -- I would refer you to the original work,
 22 but to illustrate this, the statistic I picked out was
 23 that once the density of smoke in an average fire gets
 24 down to about 3 metres visibility, at least a third of
 25 the population will -- about a third of the population

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1 will turn back, rather than try to continue through it.
 2 And this is important in a design context. If you're
 3 planning to design for means of escape, that's
 4 an important piece of information to know: what level of
 5 smoke can you tolerate before your design fails,
 6 you know?

7 Q. Yes.
 8 Just so that we can pin this right back to the
 9 evidence, just help me -- well, let's have it up,
 10 {HOM00046371}. This is an article called "Smoke
 11 control -- a short review and discussion of some current
 12 issues" by Stewart Miles, Martin Shipp and you. Is that
 13 the article you're referring to? Well, let's go to --

14 A. No, I don't recall this.
 15 Q. Let's go to page 6.
 16 A. Ah, yes, that's the -- and this diagram I put together
 17 from Professor Jin's work --

18 Q. Right.
 19 A. -- and you will find it appears in quite a few,
 20 including the SFPE handbook.
 21 I mean, the latest document to pull all this
 22 together is a British Standard fire engineers guidance
 23 document which was published in 2019 by the
 24 fire engineering committee of BSI, of a group that I was
 25 leading that produced this guidance document.

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1 Q. Very good.
 2 Now, let's come back, then, to the Phase 2 report.
 3 Coming out of the depths, perhaps, if we can, back to
 4 your report, page 103 {DAPR000005/103}, section 4, and
 5 you have set out there your analysis of the toxicology
 6 results and, within it, your findings of the effects of
 7 irritant smoke on the occupants of the tower. You find
 8 that at the foot of the page at 415; yes? You say
 9 there:
 10 "Although the accounts of occupants demonstrate the
 11 physical difficulties they experienced due to lack of
 12 visibility and irritancy when they attempted to move
 13 through smoke, they also demonstrate that it was rarely
 14 if ever physically impossible to move through the smoke.
 15 So that in many cases occupants attempted on several
 16 occasions to enter and move through the smoke, but felt
 17 unable to proceed and went back into their flats, until
 18 eventually they made a decision to leave and were then
 19 able to cross the lobby and enter the stair."

20 Your conclusion, I think, is at the foot of page 104
 21 {DAPR000005/104}, if we go down to that, please,
 22 paragraph 418, and I've read you 417 already:
 23 "These findings show that while dense, irritant
 24 smoke did not physically prevent occupants from
 25 evacuating their flats, the combination of the

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1 behavioural and physiological effects was a major factor
 2 preventing many flat occupants from evacuating their
 3 flats when they needed to do so."

4 A. Yes, I think that sums it up.
 5 Q. That sums it up, does it?
 6 A. Yes.
 7 Q. Now, against that background, which I think you say sums
 8 it up, let's then go to the toxicology results
 9 themselves.
 10 Now, before we do that, I think we've covered this
 11 already, but can we tick these off: first of all, blood
 12 carboxyhaemoglobin is effectively the measurement of
 13 carbon dioxide in the blood; yes?

14 A. Yes, carbon monoxide in the blood.
 15 Q. Carbon monoxide in the blood.
 16 A. Yes.
 17 Q. And the inhaled dose of carbon monoxide measured in
 18 percentage carboxyhaemoglobin gives you an indication of
 19 the extent of exposure to toxic smoke.
 20 A. Yes.
 21 Q. Carboxyhaemoglobin, as you have told us, is relatively
 22 stable in blood samples.
 23 A. Yes.
 24 Q. And easily measured in deceased individuals.
 25 A. Yes.

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1 Q. Yes, and regularly tested on survivors on admission to
2 hospital.

3 A. Yes, that's right.

4 Q. And, therefore, a reliable data point.

5 A. Yes.

6 Q. Now, then, let's, against that happy background, go to
7 page 109 of your Phase 2 report {DAPR0000005/109}, same
8 part of it, paragraph 439 there, and you set out some
9 general key principles on the fatality of --

10 A. Ah, yes.

11 Q. -- a fire derived from studies that you've referred to,
12 and you've got five of them really there. I don't want
13 to spend time reading them out to you, but perhaps we
14 can tick them off.

15 First, a finding of severe burns with a low
16 percentage of carboxyhaemoglobin tells you that
17 a subject died quickly in the fire as a result of
18 exposure to heat or burns before they had time to inhale
19 a significant dose of smoke or carbon monoxide?

20 A. Yes.

21 Q. Correct, yes.

22 Is it correct also that a finding of severe burns
23 with more than 20% of carboxyhaemoglobin but less than
24 40% of carboxyhaemoglobin indicates that the subject may
25 have died as a result of burns, but almost certainly

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1 inhaled smoke and carbon monoxide for long enough to be
2 unconscious at the time of death?

3 A. Yes.

4 Q. Yes. Is it also right that a finding of more than 40%
5 carboxyhaemoglobin indicates that the subject almost
6 certainly died from smoke inhalation, and if serious
7 burns are present, then they are most likely to have
8 occurred after death?

9 A. Yes.

10 Q. Finally, a finding of less than 40% carboxyhaemoglobin
11 and no burns indicates death most likely to have
12 occurred as a result of inhalation of toxic smoke but
13 with a contribution from other gases, such as hydrogen
14 cyanide?

15 A. Yes.

16 Q. Yes. That is because, is it, they died from the
17 combined effects of asphyxiants plus a sub-lethal dose
18 of carbon monoxide?

19 A. Yes. So if you can't account for them solely in terms
20 of carbon monoxide, we've got to look for some other
21 factor coming into the picture.

22 Q. Yes.

23 A. Yes.

24 Q. Now, are you able to explain the mechanism of death as
25 a result of exposure to asphyxiant gases?

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1 A. Yes.

2 Q. Would you please --

3 A. Yes, okay. Well, obviously -- yes, basically what
4 happens is that the two organs, if you like, that are
5 most sensitive are the brain and the heart, and of the
6 two, it's probably the brain that's the most
7 significant. So whereas many tissues like the muscles
8 can still operate for quite a while without an oxygen
9 supply, for example in sprinters, where you build up
10 an oxygen debt, but you can still run, if you're
11 Sebastian Coe or somebody, the brain has no such
12 reserves at all. So if you cut off the blood supply to
13 the brain or the oxygen in that blood for more than
14 a few seconds, you collapse almost immediately.

15 So what happens is that when you inhale carbon
16 monoxide, as I explained this morning, and it converts
17 the haemoglobin to carboxyhaemoglobin, the delivery of
18 oxygen to the tissues is heavily impaired by that
19 process, and although one compensates up to a point,
20 a critical point is reached where things deteriorate
21 very rapidly. When I've observed this happening, as
22 I've said, the transition is from a normal state,
23 through a brief period of intoxication --like behaviour of
24 a few seconds, to collapse. In fact, one of the
25 symptoms of oxygen starvation can be a brief period of

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1 euphoria, and at least one of the Grenfell survivors
2 described that as he walked down the stairs, having this
3 temporary feeling of euphoria, which was a warning that
4 he was about to reach this point of collapse.

5 So then the oxygen supply to the brain is impaired
6 and this results in permanent brain damage from which
7 you often cannot recover.

8 Sorry, does that cover the point?

9 Q. Yes, thank you. And what about the heart?

10 A. Yes, so the other thing is obviously the heart needs
11 blood and oxygen for the heart muscle to keep working.
12 If you interrupt that, you start to get arrhythmias,
13 heart attacks and problems like that, which is probably
14 why -- so if you have a pre-existing atherosclerosis,
15 coronary atherosclerosis, as many of us have in middle
16 age and going on, you have already got an impaired blood
17 and oxygen supply to the heart muscle. If that is then
18 further reduced by the presence of carboxyhaemoglobin,
19 you can reach this sort of tipping point where you go
20 into heart attack, heart failure -- well, heart attack,
21 basically.

22 SIR MARTIN MOORE--BICK: So would it be right to understand
23 it in this way: the effect of the creation of
24 carboxyhaemoglobin is to reduce the amount of
25 haemoglobin that can carry oxygen to the vital organs?

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1 A. Well, its twofold: it reduces proportionally the amount
2 that can be carried, so if you have 50%
3 carboxyhaemoglobin, you're only left with half to carry
4 oxygen.
5 SIR MARTIN MOORE—BICK: Yes.
6 A. But, more seriously, due to the chemistry of it, it
7 impairs the — the bit that's left can no longer give up
8 its oxygen to the tissues. So it's a kind of double
9 effect. That's why it's very serious.
10 Now, cyanide, on the other hand, doesn't do that.
11 Cyanide prevents the oxygen being used in the tissues.
12 It blocks tissue metabolism, so it has a different
13 mechanism. But the end result is the same: that the
14 tissues can no longer metabolise, basically.
15 SIR MARTIN MOORE—BICK: Thank you.
16 MR MILLETT: And are those two effects cumulative?
17 A. Right. If we can take carboxyhaemoglobin, for example,
18 the dose is building up cumulatively as long as you're
19 inhaling the thing, but at a particular level, the
20 effect is the effect of that level. So if you then wash
21 out, you know, the carbon monoxide, and providing you
22 haven't got to a point where you've got permanent tissue
23 damage, you should make a very rapid and hopefully
24 complete recovery.
25 Q. Right.

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1 A. I'm not sure that's answered your question.
2 SIR MARTIN MOORE—BICK: Well, I think Mr Millett's question
3 was, if I can presume to rephrase it, does the effect of
4 the hydrogen cyanide act, as it were, in combination
5 with carboxyhaemoglobin, so that that oxygen which does
6 get to the tissues isn't used by the tissues?
7 A. Yes, that's a very good question that I partly addressed
8 this morning. Because one is affecting delivery and the
9 other one is affecting use when it gets there, you would
10 think that they wouldn't be additive, and in fact when
11 you look at the blood of somebody who's poisoned with
12 cyanide, it looks like arterial blood, because it's full
13 of oxygen, it's just that the oxygen is not being used
14 when it gets to the end of the line. So you wouldn't
15 obviously expect them to be additive. But there are
16 lots of other complications which mean that they might
17 well be, one of which we mentioned this morning is this
18 effect on the uptake rate. So it's quite
19 a complicated —
20 SIR MARTIN MOORE—BICK: I think one would expect them to be
21 additive, because I had assumed from what you told us
22 earlier that although the haemoglobin which is not
23 affected by the carbon monoxide can still carry oxygen,
24 it doesn't give it up very readily, and therefore one
25 would have thought that that which is given up would

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1 then be affected by the presence of the cyanide to
2 prevent it being used by the tissues, so they would have
3 a cumulative effect. But that's not —
4 A. It's possible. It's possible. I mean, it's quite
5 a complex situation, and there's even more to it than
6 that.
7 SIR MARTIN MOORE—BICK: Right.
8 A. I mean, the default that we tend to use is to really
9 assume, if you like, at least for design purposes, the
10 worst possible case, which is that they are directly
11 additive in a dose sense. But, in practice, it may not
12 be as simple as that, I think is the answer.
13 SIR MARTIN MOORE—BICK: All right. Thank you.
14 MR MILLETT: Right.
15 Would it be right to describe the effect of carbon
16 monoxide in combination with hydrogen cyanide as the
17 cause of death as asphyxia from asphyxiant gases?
18 A. Yes.
19 Q. Now, I want to ask you about hypoxia.
20 You have covered this in your report at page 107
21 {DAPR0000005/107}, if we can go to that, back two pages,
22 at paragraph 435. I think we have probably also again
23 touched on this just now in the exchanges, but in the
24 last four lines of that paragraph you say:
25 "Carbon monoxide causes hypoxia mainly by limiting

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1 the carriage of oxygen in the blood and delivery of
2 oxygen to the tissues. Hydrogen cyanide causes tissue
3 hypoxia by inhibiting the availability of oxygen for
4 tissue respiration and low oxygen concentrations limit
5 the oxygen available for inhalation from the air."
6 A. Yes, those are three mechanisms of causing hypoxia at
7 the tissue level.
8 Q. Yes.
9 Now, again, we have covered this a little bit, and
10 it may be that the answer is the same, that it's all
11 very complicated, but are you able to explain the
12 correlation between hypoxia and asphyxia and its role as
13 a mechanism for death in the case of the Grenfell Tower
14 victims?
15 A. Yes, I can see this can be a bit of confusion here.
16 We're really talking about the same sort of thing.
17 Hypoxia obviously means lack of oxygen and, strictly
18 speaking, with cyanide poisoning, you're not lacking the
19 oxygen; the oxygen is there but you can't use it.
20 I think that's the reason we use the global term
21 asphyxiant.
22 It all ends up with the same thing: that these three
23 mechanisms, the presence of carbon monoxide, the
24 presence of cyanide or low oxygen in the air you're
25 inhaling, all end up with the body tissues, and

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1 particularly the brain tissues , either not receiving or
 2 not being able to use sufficient oxygen to metabolise.
 3 So that is the end result .
 4 Q. Right. Is hypoxia really just another word for the
 5 extent of --
 6 A. Asphyxiant effect, yes.
 7 Q. Well, the extent of carboxyhaemoglobin, or rather the
 8 effect of --
 9 A. The end result of carbon monoxide poisoning is a form of
 10 hypoxia, yes.
 11 Q. Which is asphyxiating in its --
 12 A. Which is asphyxiating in its effect .
 13 Q. -- effect.
 14 A. Yes.
 15 Q. Yes, I see. Right, thank you.
 16 A. Sorry if that's not very clear .
 17 Q. The rate of hypoxia is essentially the rate of uptake of
 18 carbon monoxide and --
 19 A. The extent to which it's developed depends upon the dose
 20 of uptake up to that point, yes.
 21 Q. Right.
 22 Now, can I ask you, then, one or two questions about
 23 metabolic acidosis.
 24 Can we go, please, to page 155 of this part of the
 25 report {DAPR0000005/155} and look at paragraph 677.

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1 This is also in the context of hypoxia.
 2 A. Yes.
 3 Q. You say:
 4 "Hypoxia from inhalation of asphyxiant gases,
 5 especially when combined with the physical stress and
 6 exercise involved in escaping down the Tower, can result
 7 in a transient metabolic acidosis. This showed in the
 8 blood of several persons, with serious consequences in
 9 one case."
 10 I think we know what the case is, but could you just
 11 explain, what is the process of metabolic acidosis?
 12 A. Right. So the simplest explanation is if you think of
 13 what happens in sprinters. A sprinter uses their
 14 muscles very actively over a very short period, and they
 15 build up what's known as an oxygen debt, in that they
 16 develop energy by glycolysis, the end product of which
 17 is lactic acid, and lactic acid then builds up in the
 18 blood and, as it says, is an acid, so acidifies the
 19 blood. So if you prevent the body from obtaining energy
 20 by oxygen metabolism, then it will use anaerobic methods
 21 to obtain that energy. These anaerobic methods result
 22 in acid in the blood, acidosis due to, for example,
 23 lactic acid.
 24 So if you inhale carbon monoxide or hydrogen
 25 cyanide -- especially hydrogen cyanide -- a sign of the

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1 intoxication is that you will end up with a more acidic
 2 blood. So that's a metabolic acidosis.
 3 Respiratory acidosis occurs when you get a build-up
 4 of carbon monoxide in your body. So if you're unable
 5 to -- again, this happens in exercise as part of normal
 6 life . If you exercise and use a lot of energy, you
 7 generate a lot of carbon dioxide in your body and your
 8 blood from the exercise, from the metabolism of your
 9 exercise, because CO2 is the end product of metabolism,
 10 and you have to excrete it through your lungs by
 11 breathing it out, and if you can't get rid of it quickly
 12 enough, then the carbon dioxide increases in your blood,
 13 you get a respiratory acidosis, which is an increase in
 14 carbon dioxide concentration in the blood.
 15 And both of these are going on here, because you've
 16 got the metabolic acidosis from the inhaled asphyxiant
 17 gases, the carbon monoxide, the hydrogen cyanide, and
 18 you've got the respiratory acidosis partly from the fact
 19 that people are hurrying down the tower, particularly if
 20 they're overweight or pregnant or whatever, you know,
 21 it's a physical problem. And also, don't forget, we're
 22 talking about fire here, so the fire is generating
 23 carbon dioxide. So one of the gases present is carbon
 24 dioxide. So whereas in normal life there's hardly any
 25 carbon dioxide, fortunately, at the moment, in our

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1 ambient air, in a fire, it can go as high as 17%, and
 2 so -- and the exhaled breath is -- sorry to the
 3 stenographer. Exhaled breath is about 5% carbon
 4 dioxide. That's your normal exhaled breath. So if the
 5 air you're inhaling has no carbon dioxide, then you're
 6 winning, because you get rid of 5%, inhaling none. If,
 7 as can easily happen in a fire, the concentration in the
 8 inhaled gas is 5%, then you can't excrete any, which
 9 means that your body has to then go above 5% in your
 10 blood by sheer physics, you know. So that's another
 11 cause of acidosis, through retention of carbon monoxide.
 12 Another mechanism is that if you get
 13 bronchoconstriction or blockage of your airways through
 14 to smoke inhalation, and you're not breathing, you're
 15 not exchanging air efficiently, and so you're not
 16 excreting carbon monoxide as well as you should, again
 17 you get this build-up.
 18 So all these factors are coalescing on people trying
 19 to come down that tower.
 20 Q. What effect does acidosis, either respiratory or
 21 metabolic, have or did it have in this case on the
 22 outcomes of victims who came down the stairs?
 23 A. Well, yes, okay, you're starting to move more into the
 24 medical area now, but essentially it can be distressing,
 25 and there are a number of people who, once they got to

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1 hospital, were noted as having — perhaps, for the
2 reasons I've stated, not that surprisingly — some
3 degree of acidosis when they first arrived at hospital.
4 Some received some treatment for that, you can give
5 buffers in the blood and bicarbonate and things like
6 that, and some just naturally, over a period of an hour
7 or two, especially as they washed out their carbon
8 monoxide, made a natural recovery.

9 But I'm sort of now passing over to what — I'm
10 accepting the medical and pathologists' findings. They
11 claimed that this particular case, the death resulted
12 from acidosis. So all I'm talking about is the
13 potential source of that acidosis, not the consequences
14 of it.

15 Q. Very good, thank you for making that distinction clear.

16 Now, you were provided with toxicology tests for
17 those who died in Grenfell Tower where they could be
18 carried out, weren't you?

19 A. Yes.

20 Q. I think you have analysed those results in your report,
21 and we can see that at page 123 {DAPR0000005/123}, if we
22 go back, please, to page 123 and look at paragraph 484.

23 A. Are we talking about the fatalities now?

24 Q. We are talking about fatalities.

25 A. Yes, yes.

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1 Q. And the heading is, "Significance of findings of
2 Carboxyhaemoglobin concentrations in fatalities at
3 Grenfell Tower", and you say in paragraph 484 as
4 follows:

5 "In this section I have considered the measured
6 values for the blood %COHb concentrations, their
7 distribution and the condition of the bodies of the
8 deceased to establish their significance in evaluating
9 the cause of death for Grenfell occupants. In Section 4
10 (Figure 13) I discussed the distribution of post-mortem
11 blood COHb measured in a large United States database of
12 fatalities from non-fire carbon monoxide poisoning and
13 for unburned fire fatalities. It is therefore relevant
14 to compare this distribution to the distribution of the
15 Grenfell fatalities to assist in establishing whether
16 Grenfell fatalities are likely to have died from carbon
17 monoxide asphyxia before their bodies were burned."

18 Now, the United States database, I think, is the
19 Nelson database.

20 A. Yes.

21 Q. Yes.

22 Now, if we go, please, down to figure 17, if we can
23 have that fully on the screen, please, there it is, it
24 says:

25 "Comparison of percentage distribution of percentage

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1 COHb [carboxyhaemoglobin] levels of Grenfell deaths with
2 Nelson unburned fire death database."

3 You have illustrated the range of tests there, test
4 results, in the Grenfell deaths.

5 Is there a correlation between the two contained in
6 that figure?

7 A. Yes, so we can see that quite a few of the — I think
8 it'll be a bit clearer with some of the later pictures,
9 but quite a lot of the Grenfell deaths have got very
10 high concentrations of carboxyhaemoglobin in their
11 bodies, and they're in this — I mean, in the Nelson
12 distribution, the most common amount at death was about
13 75%. Sorry, that was for non-fire deaths. The other
14 graph of his compares carbon monoxide gas poisoning
15 incidents with fires.

16 Sorry, let me start again.

17 What this shows is that most of the Grenfell deaths
18 were at high levels, above about 40% to 50%
19 carboxyhaemoglobin. They were all in this range where
20 Nelson is finding in non-burn deaths. So in other
21 words, it correlates with his. The ones that don't at
22 the left there I think are the ones who fell from the
23 tower. We'll see them better in another figure.

24 MR MILLETT: We do, and let's go to that straight away.

25 Mr Chairman, I'm going to cover this quickly, if

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1 I can, before the break.

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

3 MR MILLETT: If we go, please, to figure 18, which we will
4 find on the next page, page 124 {DAPR0000005/124} —

5 A. Yes, I think this is quite telling, so if we could blow
6 that up a bit.

7 Q. Could you just talk us through this chart?

8 A. Yes.

9 If we look at the — perhaps start with the ones who
10 died in the lobbies or stair, you can see that that's
11 the black bars. Most of those are well up in above —
12 bearing in mind that 50% is the lethal threshold for
13 most people. So these are up in the 60 to 70, 70 to 80,
14 even up into the 80 to 90, extremely high levels of
15 carbon monoxide in the blood of people who collapsed and
16 died in the lobbies or stair.

17 If we look at the purple distribution, those are
18 people who died in the flat, and the same applies in
19 general to them. Most of them are in this very high
20 range and, therefore, clearly inhaled a large amount of
21 carbon monoxide before they died, well up above the
22 lethal threshold.

23 There are a few examples — there was one — the
24 person in red who died in hospital had a high level, and
25 I think there was a problem with the blood sample, so it

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1 may have been even somewhat higher at the time of death.
 2 Then you've got the three blue bars, which are for
 3 people who died having fallen from the tower. Now, two
 4 of those were at 20% carboxyhaemoglobin. Now, that
 5 obviously is a sub-lethal level, it's also
 6 a sub-incapacitating level. It's a level at which you
 7 probably got a --- you start to get a throbbing headache,
 8 would be the normal symptom people would respond at that
 9 level, and you would still be able to walk around the
 10 flat and be fairly lucid, but it shows that those --- but
 11 it's a substantial dose, because we've only got to get
 12 to 30 to 40 when you would collapse unconscious. So the
 13 fact that those people at the time they fell from the
 14 tower had these sub-incapacitating but very high ---
 15 you know, rising levels to quite high doses gives us
 16 a strong indication that those who then remained in
 17 those two flats subsequently were on this very steeply
 18 rising curve and hadn't got much further to go before
 19 they too would have collapsed from asphyxiant gases.
 20 Then we have one person that I have mentioned
 21 already who fell from their flat with an incredibly high
 22 dose of 50% carboxyhaemoglobin, a young man.
 23 Q. I think it's Ali Yawar Jafari.
 24 A. Yes. So he had 50% carboxyhaemoglobin, which, as I've
 25 said, is normally regarded as a sort of lethal

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1 threshold, but he was still able to move sufficiently to
 2 fall from the tower. He was obviously a young man.
 3 But, I mean, that indicates that the occupants of that
 4 flat were facing lethal concentrations at that time.
 5 I think that just about covers it.
 6 I think one of the lower ones also, I've made some
 7 notes in the text below, was known to have suffered ---
 8 I think a couple of these people were known to suffer
 9 from heart disease and, as I've already mentioned,
 10 that's a risk factor for lower level deaths.
 11 Q. Yes. Just to correct what I just said, it wasn't
 12 Ali Yawar Jafari, he was found in the lobby on floor 10.
 13 I was thinking, I am afraid, of Mohammad Alhajali.
 14 A. Alhajali, that's it, yes, I beg your pardon.
 15 Q. And it's right, I think, that two of the individuals
 16 found in flats with less than 50% carboxyhaemoglobin had
 17 factors which may have explained their results.
 18 A. Heart disease, yes.
 19 Q. Heart disease, yes.
 20 Is it right that for eight of those who died in the
 21 lobbies or the stair, which is the black column, all but
 22 one had very high blood carboxyhaemoglobin
 23 concentrations above the lethal threshold?
 24 A. Yes, and the other point, of course, was that none of
 25 them had significant burns. None of them had

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1 significant burns.
 2 Q. Yes.
 3 A. And, in particular, the person with 50% who fell from
 4 the tower had no burns on his body at that time, even
 5 though he had inhaled a potentially lethal dose of
 6 asphyxiant gases.
 7 Q. Yes, and that was Mohammad Alhajali.
 8 A. Yes.
 9 Q. Yes. Mr Ali Yawar Jafari, I think, was the exception,
 10 and he had blood carboxyhaemoglobin at 47% ---
 11 A. Ah, yes. He was in the 10th lobby, wasn't he?
 12 Q. He was in the 10th floor lobby.
 13 A. So he had a pre-existing heart condition. In fact, his
 14 daughter mentioned something about his medication as he
 15 left the flat --- concerned about his medication for
 16 heart disease. So, yes.
 17 Q. Yes.
 18 To bring us to a conclusion on this, can we go,
 19 please, to page 137 {DAPR0000005/137}, where you set out
 20 your conclusions, and at paragraph 576 you start with
 21 the exterior fire reaching the outside room, but if we
 22 go, please, to 584 on page 138 {DAPR0000005/138}, you
 23 say:
 24 "From these findings it is likely that most if not
 25 all flat occupants were comatose and in most cases dead

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1 before exposure to significant heat or burns. I cannot
 2 exclude the possibility of some heat exposure in some
 3 flat occupants while still breathing (and therefore
 4 before the point of death), since the autopsies of
 5 Vincent Chiejina from flat 144 and Steven Power from
 6 Flat 122 show some signs of possible minor heat damage
 7 to the airways consistent with inhalation of hot fumes
 8 before death. The severe burning of bodies of flat
 9 occupants resulting in charred remains is likely to have
 10 occurred in all cases sometime after death when the flat
 11 interiors developed prolonged, fully involved
 12 compartment fires which effectively consumed all the
 13 combustible flat contents."
 14 That's your conclusion.
 15 A. Yes.
 16 MR MILLETT: Yes, thank you.
 17 Mr Chairman, is that a convenient moment?
 18 SIR MARTIN MOORE-BICK: Well, it is, but there is one thing
 19 I would just like to clarify.
 20 Can we just go back up to the bottom of 584 on the
 21 previous page, please. You say there that you think it
 22 likely that most if not all the occupants were comatose
 23 before being exposed to significant heat.
 24 A. Yes.
 25 SIR MARTIN MOORE-BICK: You can't exclude the possibility,

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1 you then say, of some heat exposure to some occupants,
 2 but do you think it more likely or not that those who
 3 were exposed to heat were at that stage comatose?
 4 A. Yes, I think it's more likely than not that those -- if
 5 some were alive, they were most likely to have been
 6 comatose or almost comatose -- comatose at that time,
 7 yes.
 8 SIR MARTIN MOORE--BICK: All right. That's really what
 9 I wanted to clarify.
 10 A. Yes, I do believe that's the case, yes.
 11 SIR MARTIN MOORE--BICK: Right. Thank you very much.
 12 Well, we'll take the afternoon break at that point,
 13 so we'll stop there. We will resume at 3.40, please,
 14 and the usual restrictions apply. Thank you very much.
 15 THE WITNESS: Yes. Thank you.
 16 SIR MARTIN MOORE--BICK: Would you go with the usher, please.
 17 Thank you.
 18 (Pause)
 19 Thank you. 3.40, please.
 20 (3.23 pm)
 21 (A short break)
 22 (3.40 pm)
 23 SIR MARTIN MOORE--BICK: All right, professor, ready to carry
 24 on?
 25 THE WITNESS: Yes.

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1 SIR MARTIN MOORE--BICK: Thank you very much.
 2 Yes, Mr Millett.
 3 MR MILLETT: Mr Chairman, thank you.
 4 Now, can I turn to the question of hydrogen cyanide
 5 exposure and post-mortem blood tests for cyanide.
 6 Can we go, please, to page 111 of the same section
 7 of your report, {DAPR0000005/111}, and you say there,
 8 section 2.2 at the top:
 9 "Hydrogen cyanide exposure and post-mortem blood
 10 tests for cyanide."
 11 Now, if we can break this up into simple steps, is
 12 it right, first, all burning fuels contain carbon?
 13 A. Yes.
 14 Q. Yes. So a fire survivor will also show the presence of
 15 carboxyhaemoglobin concentrations proportionate to their
 16 exposure?
 17 A. Yes.
 18 Q. Yes. But not all fuels contain nitrogen?
 19 A. That's correct.
 20 Q. You say, I think, that it's possible for a fire survivor
 21 to present with high blood carboxyhaemoglobin
 22 concentrations but low blood cyanide.
 23 A. Yes, if there have been no nitrogen-containing fuels in
 24 the fuel load that they were exposed to.
 25 Q. Yes. You've explained before this morning, and just to

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1 repeat the point, that hydrogen cyanide inhalation
 2 causes rapid incapacitation.
 3 A. Yes.
 4 Q. And it's considered more significant for rapid
 5 incapacitation than as a primary cause of death.
 6 A. Yes.
 7 Q. Yes.
 8 Now, let's go, then, to page 112 {DAPR0000005/112},
 9 paragraph 447 at the top of the page. There is a long
 10 paragraph, I'm not going to read it all out to you, but
 11 let me see if I can summarise it and see if you can
 12 agree with my summary.
 13 Is it right that, unlike carboxyhaemoglobin
 14 concentrations in blood, testing the concentration of
 15 cyanide in blood is difficult for a number of reasons:
 16 first, that there is a low natural background
 17 concentration of cyanide in blood?
 18 A. Yes.
 19 Q. And, secondly, the natural background concentration of
 20 cyanide is elevated for smokers; yes?
 21 A. Yes.
 22 Q. And also after the ingestion of certain foods, such as
 23 bitter almonds?
 24 A. Yes.
 25 Q. And a short exposure to high concentrations of cyanide

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1 causing collapse may cause incapacitation, but then the
 2 levels of blood cyanide may reduce, is this right --
 3 A. Yes.
 4 Q. -- so that when they're finally measured, they can be
 5 lower than at the --
 6 A. Yes.
 7 Q. -- critical stages of the fire?
 8 A. There can be a peak, yes.
 9 Q. Yes.
 10 Also, cyanide is unstable in blood and there will be
 11 a decrease in the cyanide levels in blood between the
 12 death and the date of measurement.
 13 A. Quite marked, yes.
 14 Q. Quite marked. And they continue to decrease in blood
 15 stored after removal.
 16 A. Yes.
 17 Q. I think you also say that cyanide concentration levels
 18 change in frozen blood samples between freezing and
 19 thawing.
 20 A. Small changes have been observed, yes.
 21 Q. And in that, you also say more significantly in smokers.
 22 A. I don't recall particularly about that, no. You mean
 23 frozen blood from smokers?
 24 Q. Yes, I picked that up at the top of page 113
 25 {DAPR0000005/113}.

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1 A. Okay.
 2 Q. Let's just go to that. You look doubtful. You say at
 3 the top there that the freeze/thaw is:
 4 " ... due to the re-conversion of small amounts of
 5 thiocyanate to cyanide."
 6 A. Yes. That was in any of these samples, yes.
 7 Q. Right. You say:
 8 "This effect is considered likely to be significant
 9 only when examining low concentrations of cyanide such
 10 as is found in the blood of smokers ..."
 11 A. Ah, yes, sorry. Yes, I think that's slightly
 12 misleading.
 13 So what I'm saying is that when you are basically
 14 looking at background levels, very low levels, in either
 15 normal non-smokers or in smokers, where there is a bit
 16 of cyanide in the blood, then because it's so low, the
 17 difference between frozen and non-frozen can be quite
 18 a large percentage of the original very low level. So
 19 it looks like a big change in percentage terms, but it's
 20 actually a very small change in real terms.
 21 If you have a much higher blood level, such as from
 22 a fire or something, then this tiny change doesn't
 23 really show up as any great significance.
 24 Q. Yes.
 25 Now, you have explained at paragraph 595, if we can

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1 go, please, to page 140 {DAPR0000005/140}, at the foot
 2 of the page, that there were significant amounts of
 3 nitrogen in both the exterior cladding and in the flat
 4 contents; yes?
 5 A. Yes.
 6 Q. And that meant that the Grenfell occupants would have
 7 been exposed to hydrogen cyanide during the fire come
 8 what may.
 9 A. Yes.
 10 Q. You asked for blood samples from Grenfell to be tested
 11 for cyanide, and that was done some two years or so
 12 after the fire.
 13 A. It was eventually done then, yes.
 14 Q. Yes.
 15 A. It was about a year after when I requested it.
 16 Q. Yes. We can pick that up -- we don't need to go to it.
 17 A. No, no. There was a long time before the analysis was
 18 done, yes.
 19 Q. Due to the passage of time, could any meaningful
 20 analysis be made of the blood tests taken after this
 21 time, so far as cyanide is concerned?
 22 A. Yes, so my reason for doing this, partly, was obviously
 23 that we knew it was there, so we felt we should look
 24 into it. Also, it was picked up -- at the time, it was
 25 suggested that certain people had been exposed to

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1 cyanide during Grenfell, so we ought to look for it.
 2 And although any measurement we made on these
 3 post-mortem samples now was subject to all these
 4 caveats, it still might be possible to show a signal, if
 5 you like. If there was a sign of elevation there, then
 6 it would be evidence to corroborate the fact that they
 7 had inhaled cyanide. On the other hand, if the samples
 8 were so deteriorated that we couldn't really say
 9 anything, that couldn't rule out the fact they may have
 10 inhaled cyanide. Is that clear? Do you understand?
 11 Yes.
 12 Q. Yes.
 13 A. Make sense?
 14 Q. It does make sense, and it probably makes sense to show
 15 you how you put it in your report.
 16 Can we pick it up at paragraph 601
 17 {DAPR0000005/141}, please.
 18 A. Yes, that sort of sums it up.
 19 Q. You say -- yes, exactly, thank you:
 20 "While the absence of measurable cyanide in these
 21 samples does not provide evidence that the subjects were
 22 not exposed to cyanide, where cyanide is detected in any
 23 samples above threshold levels this may be an indication
 24 of exposure during the incident."
 25 Yes?

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1 A. Yes. So it was worth looking, that's all I'm saying,
 2 for completeness, really.
 3 Q. Let's then go to the next page, page 142
 4 {DAPR0000005/142}.
 5 A. That summarises what we found.
 6 Q. Figure 19.
 7 A. Yes.
 8 Q. That summarises, you say, what you found. Just to
 9 summarise that, this is a plot of the results of the
 10 cyanide tests for Grenfell in relation to the background
 11 cyanide levels in both smokers and non-smokers, I think.
 12 A. Yes.
 13 Q. Is it right that, from the 12 samples that were
 14 available to you for testing, five showed no cyanide
 15 detected?
 16 A. Yes.
 17 Q. Those are the black squares along the bottom.
 18 A. Yes.
 19 Q. But six had some measurable levels.
 20 A. Yes.
 21 Q. And you can see those, they're the open -- is this
 22 right? -- white and red circles.
 23 A. Seven we've got there, I think.
 24 Q. Seven.
 25 A. Yes, those are the open circles -- well, they're the

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- 1 circles , the circles , had something in them.
- 2 Q. Yes. What do the red circles indicate?
- 3 A. I picked those two out because they were somewhat
- 4 elevated above these sort of background levels. The
- 5 other reason for plotting it the way I have is that
- 6 while it's possible to have a fire with lots of carbon
- 7 monoxide in but no cyanide, it's really more or less
- 8 impossible to have a fire with lots of cyanide and no
- 9 CO, and in previous pathology studies, particularly one
- 10 big study that was done in the Strathclyde region of
- 11 Scotland some years ago, there is an obvious correlation
- 12 between high blood cyanide and high carboxyhaemoglobin.
- 13 So if you've got high cyanide, it's always in the
- 14 presence of high carboxyhaemoglobin.
- 15 Q. Why is that?
- 16 A. Because the carboxyhaemoglobin is a measure of the
- 17 extent to which people have inhaled smoke. So if
- 18 they've got a very low carboxyhaemoglobin, it means
- 19 they've hardly inhaled any toxic products at all. So
- 20 you would always expect to have quite a bit of CO
- 21 present if you've got cyanide. The two correlate. They
- 22 go together.
- 23 Q. Yes, and we discussed this a little bit before the break
- 24 at lunch today --
- 25 A. If you have a fuel that produces both carbon monoxide

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- 1 and cyanide, then you'd expect some correlation between
- 2 the elevation of those two toxins.
- 3 Q. Yes.
- 4 Now, just going to the chart --
- 5 A. And that's the dotted line in the chart.
- 6 Q. That's the purple dotted line in the chart.
- 7 A. Little dotted line -- no, no, the tiny dots -- shows
- 8 that there is a slight positive slope, which is
- 9 a sort of suggestion that what I've just said is showing
- 10 up slightly as a signal at Grenfell. It's all very
- 11 approximate, you know.
- 12 Q. What's the difference between the red dot and the white
- 13 dot so far as Mohamednur Tuccu is concerned, who is
- 14 given a red dot, and Abdeslam Sebbar, who is given
- 15 a white dot?
- 16 A. Ah, yes, I think it's because they were both in the same
- 17 place, weren't they? Those two were in the lobby, the
- 18 10th lobby, where I think there was a severe exposure.
- 19 Sebbar was in a flat on his own. I think that's why
- 20 I coloured those two red. It probably tells you in the
- 21 text.
- 22 Q. Well, I'm not entirely sure it does.
- 23 A. Doesn't it? Okay. Well, just to talk about these, the
- 24 four black ones, obviously they couldn't -- the fact
- 25 they couldn't detect anything could be related to the

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- 1 state of the sample, so that's those four black squares.
- 2 Then we've got the white open circles which they have
- 3 reported a level, the analysts, but when I compare those
- 4 levels with the sorts of background levels we might find
- 5 in smokers and non-smokers, they're very, very close to
- 6 these kind of threshold levels, though it doesn't really
- 7 tell us a great deal. But particularly if we look at
- 8 Khalloufi, and to some extent Tuccu, possibly also
- 9 Sebbar, this is sort of showing its head above the
- 10 waterline a little bit.
- 11 I mean, I'm not making great claims for this, I'm
- 12 just pointing out these correlations, or lack of them.
- 13 Q. I understand.
- 14 Just to correct something I think you said before,
- 15 Mohamednur Tuccu was recovered from the 10th floor
- 16 lobby, but Abdeslam Sebbar was recovered from his flat
- 17 on floor 11.
- 18 A. Yes. Mohamednur Tuccu was in the lobby as well.
- 19 I think that might be where I ... anyway, that's the
- 20 situation. So those two were together, and certainly
- 21 Khalloufi -- well, that sample is quite elevated, but if
- 22 you look at the line across the top at 1, that's a kind
- 23 of threshold for a toxic cyanide level in stored blood,
- 24 you know, so we're well below where we would start to
- 25 make great claims for all this.

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- 1 The other thing I draw your attention to is the
- 2 three diamonds to the left of the picture there.
- 3 Q. Survivors.
- 4 A. They were blood levels measured in survivors at
- 5 hospital. So I found three -- in the survivors'
- 6 hospital data I examined, I found three references to
- 7 blood measurements of cyanide in survivors, and you can
- 8 see that these are also very, very low. I mean, they
- 9 may be slightly -- but possibly slightly elevated about
- 10 what you might expect to find if they were non-smoke --
- 11 well, if they had not been exposed at all.
- 12 So it's a kind of hint that there is some sort of
- 13 signal coming through here, but it's not, you know, that
- 14 significant, if you like.
- 15 Q. What are we to make of the fact that certainly for one
- 16 if not two of the survivors, the blue diamonds, they are
- 17 at very slightly higher levels of cyanide concentration
- 18 at the date of the measurement than those you have
- 19 measured for Mohamednur Tuccu or Abdeslam Sebbar?
- 20 A. Well, of course, these samples are fresh samples. They
- 21 weren't stored for several years. On the other hand,
- 22 they were in living persons, and in living persons the
- 23 cyanide isn't washed out as it is with CO, but it's
- 24 metabolised by the liver, so it decreases, and as you
- 25 can see, these three diamonds, the carboxyhaemoglobin

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1 levels were pretty low at the time, which reflects the
 2 fact that their CO had already been washed out. So
 3 there had been some time for the cyanide in their blood
 4 to some extent to have been metabolised. So to the
 5 extent that that may be slightly elevated, it was — in
 6 all these samples, almost certainly the levels in their
 7 blood would have been significantly higher at the time
 8 they exited the tower.
 9 Q. Yes.
 10 A. But really the point I'm looking at with this is, if you
 11 like: does this dataset give us any kind of signal that
 12 corroborates what we'd expect to see, which is some sign
 13 of elevated blood cyanide in people who had been exposed
 14 at Grenfell to correlate with the fact that we know
 15 cyanide must have been present in the smoke they were
 16 inhaling? And I would say it is giving us some kind of
 17 weak signal in that direction, but it's not something we
 18 can really state as objective proof or anything like
 19 that. But it's an indication, that's all we can claim.
 20 And the point is we've done it, we've looked, and that's
 21 what we've found.
 22 Q. From your results, I think it is the case — and tell me
 23 if this is wrong — that you were unable to conclude
 24 whether there was a sufficient hydrogen cyanide quantity
 25 inhaled during the fire to have made a significant

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1 contribution to incapacitation and death?
 2 A. Yes. I mean, I think these sort of levels do to some
 3 extent correlate with my earlier calculations and
 4 predictions from the conditions at the time and the
 5 ratios we talked about earlier, that we would expect to
 6 see some sign of some cyanide in the blood of these
 7 persons, but we would not expect it to be up in the 2 or
 8 3 milligrams per litre, which is way off the top of this
 9 chart, where we would say: ah, this is the cause of
 10 incapacitation and death of these persons. So
 11 I'm afraid it doesn't give us a great deal, but it's
 12 been done for completeness. It does show some
 13 indication that helps to corroborate the fact that they
 14 were exposed to some extent. It also to some extent
 15 corroborates the idea that the extent to which they were
 16 exposed was not that extreme. But, you know, I don't
 17 think we can make great claims for all this.
 18 Q. Now, I want to turn back to a topic that we touched on
 19 before the break, a little bit earlier than the break,
 20 if we can just do that, and that's the question of
 21 uptake of carbon monoxide and washout rates,
 22 particularly in respect of children or asthmatic people
 23 or elderly people or people who are physically
 24 compromised.
 25 Now, can I ask you about pregnancy: would carrying

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1 a foetus increase the uptake rate?
 2 A. Of the adult?
 3 Q. Of the adult, of the mother.
 4 A. I couldn't really say either way, I don't ... not
 5 particularly, except that obviously there is more
 6 exertion involved if they're near term, sort of thing,
 7 heavily pregnant.
 8 Q. Yes. I mean, I'm addressing you really to a mid-term
 9 pregnancy, 20 to 21 weeks.
 10 A. Yes. It could have a minor effect, but I don't see why
 11 that would be a big effect.
 12 Q. What about the washout rate, would that be —
 13 A. Of the mother?
 14 Q. Of the mother.
 15 A. Right. Well, I don't think it would particularly affect
 16 the washout rate of the mother, but, of course,
 17 an important issue is the extent to which any CO in the
 18 mother's blood is transferred to the foetus, and I don't
 19 know quite where you're going with this.
 20 Q. Well, would the fact that the mother was mid-term affect
 21 the rate at which the carbon monoxide was washed out of
 22 her blood?
 23 A. Not particularly that I can think of, no.
 24 Q. So the next question is: would washout of her blood
 25 similarly wash out the foetus' blood?

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1 A. Right. I did try to look into this issue. It had
 2 always been my understanding that foetal blood was
 3 somewhat — foetal haemoglobin would more readily take
 4 up carbon monoxide than adult haemoglobin, it's slightly
 5 different. But when I looked into this in relation to
 6 the Grenfell cases, the main point I discovered in the
 7 literature was that there's a considerable time lag
 8 between uptake of carbon monoxide in the mother's blood
 9 and it appearing in the foetal blood, and because the
 10 time course and washout sequence at Grenfell was
 11 relatively short, and there's this sort of one hour or
 12 so delay, the conclusion was that you would not expect
 13 to see high carboxyhaemoglobin in the foetal blood for
 14 this case, basically. Indeed, when the baby's blood was
 15 analysed, there was virtually no carbon monoxide in the
 16 baby's blood.
 17 Q. Would any effect of pregnancy be exacerbated by asthma
 18 or other respiratory difficulties?
 19 A. Well, I mean, obviously the concern here — my main
 20 concern here about the pregnancy would be the hypoxic
 21 effects on the mother affecting the oxygenation and any
 22 acidosis of the foetal — of the foetus.
 23 Q. Indeed.
 24 A. So that's something very serious to consider, but that's
 25 not quite what you asked.

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1 Q. Yes. Thinking about the mother, would the effect on the
2 mother be exacerbated if she happened to be asthmatic as
3 well, or had other --
4 A. Oh, I see.
5 Q. -- respiratory problems?
6 A. It could do, yes. It could do, for the reasons we've
7 discussed, yes.
8 Q. Turning to children, who have got smaller lung capacity,
9 would the uptake rate of a young child be greater than
10 a child who was older?
11 A. Right. So the uptake rate of carbon monoxide, as I said
12 this morning, is proportional to body size. So the
13 smaller you are, the greater the rate of uptake. So
14 it's a question of body size. And activity level,
15 of course.
16 Q. And activity level. And would the washout rate be
17 similarly --
18 A. The washout rate --
19 Q. Would be quicker?
20 A. I think it probably would be, yes. I don't know I have
21 any data for that particularly, but yes.
22 Q. Right.
23 Now, let's then turn to the analysis of the survivor
24 records, because I think you obtained some medical
25 records from survivors --

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1 A. Yes.
2 Q. -- and I just want to ask you in general terms, first,
3 your findings from your analysis of those records.
4 Can we please go to {DAPR0000005/148}, figure 20,
5 the next figure on. Here I think you have plotted the
6 carboxyhaemoglobin concentrations from 21 Grenfell Tower
7 survivors relative to the time that elapsed after
8 exiting the building.
9 A. Yes.
10 Q. Now, could you explain, in brief terms if you can, what
11 the graph tells us?
12 A. Right. So this is a -- these are the washout curves,
13 and I pooled the data from all the samples taken from
14 all the people, partly, as I say, to preserve anonymity,
15 but partly because it makes it more powerful as
16 a combined dataset, and then I've fitted a curve to that
17 dataset to see what it indicates as the percentage
18 carboxyhaemoglobin at the time they left the tower, or
19 at least at the time they started to receive oxygen
20 treatment outside the tower.
21 I've divided the dataset into two sets, as you can
22 see there: those who descended from the upper floors of
23 the tower and therefore had a longer exposure in the
24 stair, and those who descended from the lower floors of
25 the tower -- it's actually just floors 10 to 12 that

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1 I had data for -- where they obviously spent a shorter
2 period descending because they're coming from lower
3 floors.
4 So for those who descended from the upper floors,
5 just fitting a curve to that dataset back extrapolating
6 gives us a figure of just around 30% carboxyhaemoglobin
7 at the time of exiting the tower, or just slightly lower
8 at the time of starting oxygen, if that was ten minutes
9 later, for example, that's the solid blue line is
10 a ten-minute line, I think.
11 Q. Right.
12 A. Yes.
13 Q. Just for those of us who don't know, and perhaps
14 including me in that, what is a washout curve?
15 A. Right. I think we touched on this earlier. So,
16 basically, as I said this morning, if you've got, say,
17 30% carboxyhaemoglobin in your blood, you walk out of
18 the tower and you start to breathe air. As you breathe
19 air, every time you exhale you excrete, get rid of, some
20 of that carbon monoxide, you wash it out of your blood.
21 So it's kind of washing the blood clean, in a simple
22 sense. And the rate at which that happens is very slow
23 if you're breathing air and it would take you four and
24 a half hours or so to get down to the half the level you
25 started with, to get from 30 to 15. But if you breathe

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1 oxygen, then it takes about 74 minutes, and indeed the
2 dotted line there, black dotted line, is the 74-minute
3 half-life curve, which I got from literature as we spoke
4 about this morning. You can see that the slope of that
5 74-minute published washout curve is really very close
6 to the fitted curve for the actual dataset from
7 Grenfell. So that gives me a lot of confidence that
8 this is making sense here.
9 Q. Just to break that up a little bit, is it right that the
10 blue dashed line shows the fitted carbon monoxide
11 washout curve --
12 A. To the actual dataset.
13 Q. -- back calculated to the time of actual exit?
14 A. Yes.
15 Q. Yes, and the blue vertical line gives you ten minutes
16 after the tower exit?
17 A. Yes, in case you just breathed air before anybody gave
18 you an oxygen set.
19 Q. Exactly. So it's to account for a delay between leaving
20 the tower and starting to be given oxygen.
21 A. Yes, exactly. And obviously I've been studying the LA4
22 ambulance forms and the accounts of occupants to see
23 what accounts they gave of when and what oxygen they
24 were given.
25 Q. Yes, and I think at paragraph 644 at the foot of the

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1 page, if we just can see that on the screen, you
 2 calculated or concluded that if oxygen treatment was
 3 provided immediately, survivors had at least 32% of
 4 carboxyhaemoglobin concentrations on exit.
 5 A. Yes.
 6 Q. Yes? And if oxygen treatment was provided after
 7 ten minutes, then survivors had at least 30% of
 8 carboxy --
 9 A. Yes, which is more realistic. I mean, they weren't
 10 given it as they stepped out the door, sort of thing.
 11 Q. Yes. I think you also find that the back calculated
 12 estimate of 30% to 32% carboxyhaemoglobin concentrations
 13 in survivors is consistent with survivors' descriptions
 14 of --
 15 A. Of their state they were in.
 16 Q. -- of the state they were in.
 17 A. Yes.
 18 Q. Which is the experiencing weakness --
 19 A. Yes.
 20 Q. -- and collapsing at the foot of the stairs.
 21 A. Exactly.
 22 Q. Is it right you have also explored the relationship
 23 between the carboxyhaemoglobin concentrations and exit
 24 time and floor level?
 25 A. Yes, I have, yes.

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1 Q. Let's see if we can just get into that a little bit.
 2 Can we please turn to page 150 {DAPR0000005/150},
 3 two pages on, which is the next figure, figure 21, and
 4 that's the relationship between carboxyhaemoglobin and
 5 exit time.
 6 A. Yes. So one of the questions obviously that arises here
 7 is all this is predicated on -- or I'm kind of working
 8 towards an idea that the carbon monoxide
 9 concentration -- the average carbon monoxide
 10 concentration in the stair was around about 1,800 ppm
 11 for most of this period, and that although it may have
 12 varied somewhat at individual floor levels, on average
 13 throughout the stair column it remained at approximately
 14 the same level.
 15 Now, this particular graph is -- I plotted the
 16 percentage COHb against time, and what I'm trying to
 17 illustrate here is if there had been a dramatic change
 18 in the average concentration of CO in the stair during
 19 that period, then we would expect to see a slope across
 20 here, you know, a trend. So, for example, if the carbon
 21 monoxide in the stair at 3 o'clock had been twice as
 22 much as it had been at 2 o'clock, then we would expect
 23 a steep upward slope if we fitted a line to these dots.
 24 But what we in fact see is it's more or less flat, and
 25 there are ones who are a little bit higher at the end

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1 there, but I have given individual reasons why that is
 2 the case.
 3 So, in other words, what I have concluded from this
 4 is that this evidence supports my assertion that the
 5 average carbon monoxide concentration in the stair
 6 column was more or less, within some averaging, the same
 7 over that period from about 2.30 to about 4 o'clock.
 8 Q. And that was about 1,800 parts per minute?
 9 A. About 1,800, yes.
 10 Q. So this, you say, supports your thesis that it was
 11 a constant, or more or less constant --
 12 A. The average was, yes.
 13 Q. Yes.
 14 A. Yes.
 15 Q. If we go, please, to page 151 {DAPR0000005/151}, the
 16 next figure, figure 22, you have plotted, I think,
 17 carboxyhaemoglobin concentrations with flat evacuation
 18 floor levels.
 19 A. Yes, so floor level here is a sort of proxy for the time
 20 you spend descending the stair, in the stair. So if
 21 you're coming from a high floor, you're breathing that
 22 1,800 ppm for a much longer period, and so if the main
 23 determinant of the level you end up with is the time you
 24 spend descending the stair, then we would expect
 25 a positive slope in this dataset, which is the dotted

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1 blue line there, and, as you can see, there is quite
 2 a strong positive relationship between the two.
 3 Q. Yes.
 4 A. So I think this is -- and there's various caveats in
 5 individual cases that I've detailed on there and
 6 explained in the text, but the overall position is:
 7 floor number is a strong indicator of how much you're
 8 going to inhale in the end and, therefore, it's the time
 9 that you spend descending the stair that's important.
 10 Q. Yes, so a general relationship between the percentage
 11 carboxyhaemoglobin at tower exit time and where you have
 12 come down from.
 13 A. Yes.
 14 Q. The floor you have come down from.
 15 A. Yes.
 16 Q. Now, the next one on is figure 23, page 152
 17 {DAPR0000005/152}, please.
 18 A. So the alternative to that explanation could be that
 19 it's not the time you spent in the stair that's
 20 important, it's the time you spent in your flat that's
 21 important, and if it was the time you spent in your flat
 22 that's important, we'd expect to see a strong positive
 23 line in this. But, in fact, there's no relation at all,
 24 the time spent in the flat and the amount of carbon
 25 monoxide in your blood, which again supports my

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1 interpretation that we spoke of earlier today, that
 2 providing you left -- of course, these are all people
 3 who evacuated before the external fire was outside their
 4 flat for an extended period.
 5 Q. That was my question.
 6 A. That was the point. So I'm saying they all -- it was
 7 not due to the time they spent in the flat, it was the
 8 time they spent in the stair that was the main correlate
 9 for their eventual total dose, and they had a low dose
 10 at the time.
 11 Q. Right. And these are all survivors.
 12 A. These are all survivors, yes.
 13 Q. So people had accumulated up to some 42% of carboxy in
 14 the --
 15 A. Yes, but it wasn't correlated with the time they spent
 16 there.
 17 Q. Yes.
 18 A. That's all, yes.
 19 Q. Yes.
 20 You have, I think, also plotted similar graphs
 21 marking the relationship between inhalation injury --
 22 A. Yes, so this is something we haven't spoken about as
 23 yet. So --
 24 Q. Can I just --
 25 A. Yes, go on.

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1 Q. Before you go on, let me just plot it out for you.
 2 If we go, please, to page 161 -- I think we have two
 3 figures, actually, here. Page 160 {DAPR0000005/160},
 4 first of all, which is figure 25.
 5 A. Right, yes, so this is --
 6 Q. And 26 on page 161 {DAPR0000005/161}.
 7 A. So this is, again, the relationship between evacuation
 8 floor, which is a proxy for time in the stair, and
 9 severity of inhalation injury, and you can see there is
 10 a strong positive slope again. So what's happening here
 11 is that if you inhale -- if you were exposed to irritant
 12 smoke, we discussed at length the effects on your
 13 ability to escape and your behaviour, but the other
 14 effect of inhaling irritant smoke is it damages your
 15 lungs, and so there should be a correlation between the
 16 amount of smoke you inhale and the extent of lung
 17 damage, and the longer you spend in the stair descending
 18 the greater your dose and, therefore, the greater the
 19 lung damage you would expect to see, and that is
 20 demonstrated in this chart.
 21 There is one exception there for one individual who
 22 spent seven hours in his flat before he was assisted, so
 23 in his case it's his exposure in the flat that's
 24 important.
 25 Q. Right.

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1 First on this chart you've got a metric for
 2 inhalation injury severity grade from 0 to 3.5.
 3 A. Yes.
 4 Q. What is that? What is that metric?
 5 A. I think there is a little chart, isn't there, a little
 6 table somewhere there, that will just explain it.
 7 I used a medical scoring system that I saw on the
 8 internet, and -- possibly we could find that, could we?
 9 Here we are. So you assign a score for severity of
 10 injury.
 11 Q. Just pause, that's page 158 {DAPR0000005/158}, table 19,
 12 is it?
 13 A. Yes. So on a scale of 0 to 4, based upon the reported
 14 medical signs and symptoms. So no injury, you know --
 15 well, you can see what it is there.
 16 Q. Yes, and --
 17 A. So I used that scoring system and I read the notes of
 18 each individual, and then I assigned them a score from
 19 this scale, and then that's the basis of those plots
 20 that you see in the diagram we were just looking at.
 21 Q. Right. Is there any correlation between this chart and
 22 which floor they came --
 23 A. Yes. Yes. So the further they descended in the stair,
 24 the longer they were in the stair, the higher the
 25 carboxyhaemoglobin and the higher the probability of

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1 having severe injury. And if you look at the chart,
 2 there is one where I plot this injury against
 3 carboxyhaemoglobin, which I think is a good one to look
 4 at.
 5 Q. So do we take it from this chart -- can we go back to
 6 it, please, at page 160 {DAPR0000005/160} -- that the
 7 higher the floor you came down from --
 8 A. The more likely you were to have a severe injury, yes.
 9 Q. And that's because of uptake in the stair?
 10 A. A longer time in the stair breathing the smoke, and
 11 I think the next one I related to carboxyhaemoglobin,
 12 which is another proxy for the same thing, essentially.
 13 Q. And that's 26, if we can go to page 161
 14 {DAPR0000005/161}.
 15 A. I think this is ... Oh, no, this is the same picture
 16 again. It doesn't relate to how long you were in the
 17 flat.
 18 Q. No.
 19 A. No, the next one, please. I think it might be 27.
 20 I know it's there somewhere.
 21 Q. Well, there isn't a 27.
 22 A. Okay. There is a chart there which shows the injury
 23 level plotted against carboxyhaemoglobin, and that's
 24 quite telling, because it shows that if you've got more
 25 than about 20% -- if you've got less than about 20%

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1 carboxyhaemoglobin in your blood, you are unlikely to
 2 have a significant inhalation injury, because you
 3 haven't inhaled that much smoke.
 4 Q. It's 24, I think, page 159 {DAPR0000005/159}.
 5 A. It would be good if we can find it.
 6 Q. Yes, I think that's the one. That measures injury --
 7 A. There we are. That's a better one, yes.
 8 So this is a plot of the percentage
 9 carboxyhaemoglobin at tower exit time against inhalation
 10 injury severity grade. Right? And the sort of thesis
 11 is the more smoke you inhale, the higher your
 12 carboxyhaemoglobin, and also the higher the probability
 13 you have of severe lung injury. You see this very
 14 strong positive correlation between the two, which
 15 demonstrates this point. Not only that, but in
 16 experiments we found -- animal experiments -- that
 17 there's a sort of threshold, that you seem to be able to
 18 survive having a certain amount of -- and this is smoke
 19 particulates with irritant chemicals attached,
 20 essentially, that we're inhaling, into the airways and
 21 deep lung. You can inhale a certain amount which would
 22 just give you a bit of cough the next day and then you
 23 recover quite easily, you know.
 24 If you go above this kind of tipping point, then you
 25 seem to get really quite severe injury, and I think this

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1 is to some extent showing up here. So the people who
 2 got less than about 20% carboxyhaemoglobin, and
 3 therefore had a relatively low smoke exposure, also had
 4 a very low instance of lung injury. But once you get up
 5 to about 30% carboxyhaemoglobin, quite a lot of these
 6 people are really in quite a bad state, and these are
 7 people who were put into induced comas, sometimes for
 8 several days, had a lot of lavage and cleaning of the
 9 lungs for secretions and were in a really quite serious
 10 state.
 11 But I have to say, remarkably, the outcome for
 12 Grenfell, which differed considerably from the Rose Park
 13 case, was that they all survived, whereas at Rose Park
 14 they had quite a lot of deaths. So maybe things have
 15 moved on, you know. That's an encouraging sign,
 16 I think.
 17 Q. Now, we have looked at quite a lot of this material, but
 18 just to see if we can draw some threads together, is it
 19 right that from the three graphs, 24, 25 and 26, and
 20 your analysis from the evidence in the survivors'
 21 witness statements, you have concluded that the time
 22 required to descend the stair was a significant factor
 23 in carboxyhaemoglobin levels at point and time of exit.
 24 A. Yes. So what I'm saying is this particular cohort of
 25 people, all of whom are survivors, the thing they had in

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1 common was that they tended to have got out of their
 2 flats without inhaling very much of a dose. The dose
 3 they did get was mostly acquired whilst descending the
 4 stair.
 5 Q. What account have you taken so far as they are concerned
 6 of the exposure while crossing the lobby?
 7 A. I'm estimating that, in most cases, that was quite
 8 small, that they crossed it quite quickly and that
 9 wasn't -- they didn't get much of a dose in the lobby.
 10 Q. Right. I mean, have you left it out of account
 11 altogether in your mathematics, or have you --
 12 A. What we're doing here -- no, I mean, this is just
 13 correlating the back calculated carboxyhaemoglobins from
 14 the hospital data or the injury score against these
 15 factors of time in the flat or --
 16 Q. I see.
 17 A. That's all I've looked at.
 18 Q. Is it because you're working on the basis of a constant
 19 assumption of 1,800 ppm --
 20 A. In the stair column, yes.
 21 Q. -- in the stair column --
 22 A. Yes.
 23 Q. -- that you're able essentially to treat any uptake of
 24 carboxyhaemoglobin --
 25 A. As primarily in the stair --

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1 Q. -- (inaudible) in the lobbies as --
 2 SIR MARTIN MOORE-BICK: One at a time. I'm sorry, we can't
 3 have two people talking at once --
 4 A. Sorry, I beg your pardon.
 5 SIR MARTIN MOORE-BICK: -- or the stenographer is going to
 6 find it impossible.
 7 MR MILLETT: No. Can I put my question, professor.
 8 A. Yes, sorry.
 9 Q. Is it the case that because you're working at a basic
 10 constant assumption of 1,800 ppm in the stair column,
 11 and you can see from the washout curves what the total
 12 carboxyhaemoglobin percentage was at exit point, you're
 13 able to say that whatever was taken up in the lobbies
 14 was essentially negligible --
 15 A. Yes.
 16 Q. -- so far as they're concerned?
 17 A. Yes.
 18 Q. Thank you, that's very helpful.
 19 Now, if we then turn, please, to page 153
 20 {DAPR0000005/153}, you say this at paragraph 667, and
 21 I'll read it to you, because it's a conclusion:
 22 "The importance of these findings in relation to
 23 those who died in the Tower is that there has to have
 24 been other major contributory exposure to asphyxiant
 25 gases for their incapacitation and death in the flats,

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1 lobbies or stair. As described in my detailed flat by
 2 flat analysis in Section 6, one important difference
 3 between those who survived and those who died is that
 4 those who survived left their flats before the exterior
 5 fire spread outside their flat, or at least before it
 6 spread outside the room they were sheltering in. Where
 7 occupants left their flats, another important difference
 8 is that those who survived are believed to have had
 9 limited exposure while crossing the lobby, whereas some
 10 who died in the lobbies or just after entering the stair
 11 are believed to have become disorientated and
 12 experienced significant exposure to the lobby smoke.”
 13 A. Yes.
 14 Q. Just breaking that down into six propositions, if we
 15 can, just to make it crystal clear, is it right that you
 16 found, first, that the main exposure to asphyxiant gases
 17 was in the stairs?
 18 A. Yes.
 19 Q. Second, that the stairs were always passable or
 20 survivable, assuming minimal uptake of carbon monoxide
 21 in the flat or lobby?
 22 A. Yes.
 23 Q. Third, that those who were unable to survive the stairs
 24 had inhaled significant doses of asphyxiant gases in the
 25 flats before entering the stairs?

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1 A. Yes.
 2 Q. Fourth, that occupants in the tower would have been
 3 inhaling an increasing dose of asphyxiant gases while in
 4 their flats?
 5 A. Yes.
 6 Q. Fifth, but occupants would only have inhaled
 7 a significant dose of asphyxiant gases in the flat such
 8 as to impede escape when the external fire reached the
 9 flat?
 10 A. Yes.
 11 Q. And last, sixth, that in some cases, occupants were also
 12 disorientated in the lobby and inhaled an incapacitating
 13 dose due to prolonged exposure to asphyxiant gases in
 14 the lobby?
 15 A. In the lobby, yes, there were a small number of cases in
 16 that category.
 17 Q. In the lobby.
 18 A. Yes.
 19 Q. And that overall in certain cases, in individual cases,
 20 they were affected by individual characteristics such as
 21 age, the presence of small children, vulnerabilities and
 22 other matters?
 23 A. Yes.
 24 MR MILLETT: Yes, thank you.
 25 Mr Chairman, I'm now going to turn to a different

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1 topic, which is specific questions about section 6,
 2 which is the analysis of causes of incapacitation and
 3 death in individual cases. I'm reluctant to start on
 4 that at 4.25.
 5 SIR MARTIN MOORE–BICK: It doesn't seem sensible to me that
 6 you should do so.
 7 MR MILLETT: And we are making good progress.
 8 SIR MARTIN MOORE–BICK: Well, that's good to know as well.
 9 Well, in that case, we will stop at this point.
 10 It's slightly earlier than usual, professor, but
 11 we're going to stop at this point for the reasons that
 12 Mr Millett has explained.
 13 THE WITNESS: Yes, thank you.
 14 SIR MARTIN MOORE–BICK: We're going to have to ask you to
 15 come back for more questions tomorrow, but I think you
 16 were expecting that, weren't you?
 17 THE WITNESS: Yes, I was, yes.
 18 SIR MARTIN MOORE–BICK: Good. All right. Well, then, we
 19 will stop there. We will resume, please, at 10 o'clock
 20 tomorrow morning.
 21 THE WITNESS: Yes.
 22 SIR MARTIN MOORE–BICK: And the usual request applies:
 23 please don't talk to anyone about your evidence or
 24 anything to do with it over the break.
 25 THE WITNESS: I understand.

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1 SIR MARTIN MOORE–BICK: All right?
 2 THE WITNESS: Okay.
 3 SIR MARTIN MOORE–BICK: Good, thank you very much. We will
 4 see you tomorrow then. Thank you.
 5 (Pause)
 6 Thank you, Mr Millett. 10 o'clock tomorrow morning,
 7 please.
 8 Thank you.
 9 (4.25 pm)
 10 (The hearing adjourned until 10 am
 11 on Thursday, 30 June 2022)
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