



Grenfell Tower Inquiry

Day 101

March 4, 2021

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Thursday, 4 March 2021

(10.00 am)

SIR MARTIN MOORE—BICK: Good morning, everyone. Welcome to today's hearing. As before, I'm joined by my fellow members of the panel, Ms Thouria Istephan and Mr Ali Akbor.

MS ISTEPHAN: Good morning.

MR AKBOR: Good morning, everyone.

SIR MARTIN MOORE—BICK: Now, today we're going to hear evidence from Mr David Jones, who is on the building control department of the Herefordshire County Council.

We can now meet Mr Jones, and I'll check that he can see and hear me.

MR DAVID JONES (called)

SIR MARTIN MOORE—BICK: Mr Jones, good morning, are you there?

THE WITNESS: Good morning, yes, I am.

SIR MARTIN MOORE—BICK: Good.

You should have on the screen in front of you the words of the affirmation which I think you're going to make. Do you have them?

THE WITNESS: Yes, I can see them.

SIR MARTIN MOORE—BICK: Good, thank you. Can I ask you, then, please, to make the affirmation by reading out the

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words in front of you.

(Witness affirmed)

SIR MARTIN MOORE—BICK: Very good, thank you very much indeed.

Now, there are one or two things I need to run through with you before we start taking your evidence.

First, can you confirm that you are alone in the room from which you're giving your evidence?

THE WITNESS: I am, yes.

SIR MARTIN MOORE—BICK: Thank you.

Can you confirm that you have no documents or other materials with you?

THE WITNESS: I can confirm that, yes.

SIR MARTIN MOORE—BICK: Thank you very much.

Finally, can you confirm that your mobile phone is in another room and that you don't have any other electronic device with you which is capable of receiving messages?

THE WITNESS: I can confirm that to be the case.

SIR MARTIN MOORE—BICK: Thank you very much.

Now, you might like to know that your legal representatives are in the virtual hearing room. They will, as it were, look after your interests. They can, if they consider it essential, intervene in the hearing, but in general we have other means of enabling them to

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contact our counsel, so I've asked them to keep their microphones and cameras switched off, but they are there.

I hope we shan't have any problems with the sound or vision. If we do, we will probably take a short break while we ask our technicians to sort them out.

We shall have a short break during the morning and the afternoon. The morning break normally comes round about 11.15, but if at any stage you feel you need to have a break for other reasons, will you just indicate that and we will do our best to accommodate you. All right?

I'm going to mention this now while I'm talking about breaks: it is very important that, once you have started giving your evidence, you don't discuss your evidence with anyone, nor anything relating to it, until you have completely finished. I will remind you of that when we have breaks, but if for any reason I forget to do so, can you please bear that in mind.

Is there anything you would like to raise with me or any question you would like to ask before we start?

THE WITNESS: No, nothing, thank you.

SIR MARTIN MOORE—BICK: Good, thank you very much.

In that case, I'm going to invite Ms Troup to put some questions to you.

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Questions from COUNSEL TO THE INQUIRY

MS TROUP: Yes, thank you.

Good morning, Mr Jones.

Before I start, could you just confirm, please, that you can see and hear me clearly?

A. I can, yes.

Q. Can I start, then, by thanking you for attending this public inquiry to give your evidence. It is very much appreciated.

Just a couple of things to run through.

If you have any difficulty understanding any of the questions that I ask, please just say so and I can repeat the question or try to put it again in a different way. All right?

A. Okay.

Q. Also, if you can try to keep your voice up, there is a transcriber on the call who is taking a note of all of the evidence, so it's important that she hears all of your answers.

A. Yes.

Q. The other thing is that if you're answering yes or no, please do try not simply to nod or to shake your head for yes or no, but actually to say the words, because obviously a nod or a shake of the head doesn't show up on the transcript. All right?

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1 A. All right, yes.
 2 Q. Mr Jones, you have provided two witness statements to
 3 the Inquiry; yes?
 4 A. Yes, that's right.
 5 Q. So the first witness statement, if we can get that up on
 6 the screen, please, is at {HBC00000029}. If we just
 7 look at the first page, is that your witness statement?
 8 A. Yes, it is.
 9 Q. Can we go through, please, to page 62 of that statement.
 10 We can see there at the very bottom of the page that the
 11 statement is dated 18 December 2019; yes?
 12 A. Yes.
 13 Q. And that there is a signature there. Is that your
 14 signature?
 15 A. It is, yes.
 16 Q. If we look now, please, at your second witness
 17 statement, which is at {HBC00000051}, and if we go to
 18 page 6, again we see a signature there at the bottom.
 19 Is that your signature?
 20 A. Yes, it is.
 21 Q. We can see that that second witness statement is dated
 22 9 November 2020; yes?
 23 A. Yes.
 24 Q. Mr Jones, have you read both of your witness statements
 25 recently?

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1 A. I have, yes.
 2 Q. Can you confirm that the contents of both of them are
 3 true and accurate?
 4 A. Yes, to the best of my recollection, they are, yes.
 5 Q. Lastly, have you discussed the content of your witness
 6 statements with anyone before coming here today?
 7 A. No, I haven't. I have only discussed procedural matters
 8 with my legal representatives, but not the evidence.
 9 Q. Thank you.
 10 All right, I'm going to start by asking you some
 11 questions about your background and your career and some
 12 training.
 13 If we can go first, please, to {HBC00000029/3},
 14 please, we can see a heading there about halfway down
 15 the page, "Education and Career History"; yes?
 16 A. Yes.
 17 Q. You tell us first there, under that heading, that you
 18 studied up to 1995 for a BSc in construction management;
 19 yes?
 20 A. Yes, that's right.
 21 Q. And then, going down, that from 1995 to 2001 you worked
 22 at a company first called Higgs and Hill Western
 23 Limited, originally as a site manager and then as
 24 a project quantity surveyor; is that right?
 25 A. That's right, yes.

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1 Q. Then moving on from late 2001 until May 2003 you explain
 2 that you were self-employed, you were essentially doing
 3 freelance project management, I think; is that right?
 4 A. That's right, yes.
 5 Q. And then in June 2003 you joined Herefordshire Council
 6 building control department?
 7 A. Yes, that's right.
 8 Q. If we can turn over now to page 4 {HBC00000029/4},
 9 please, I'm summarising this first section, but I think
 10 essentially — and you must correct me if I'm wrong —
 11 between June 2003 and 2005 your role was as
 12 a building control surveyor. Thereafter, between
 13 June 2005 and November 2011 your role was a senior
 14 building control surveyor; yes?
 15 A. Yes.
 16 Q. Can I take it that that move was a promotion?
 17 A. Yes, it was.
 18 Q. All right. Then I think we see another promotion in
 19 November 2011, up until July 2014, and during that
 20 period you were a building control team leader or
 21 manager; yes?
 22 A. Yes.
 23 Q. Right.
 24 As I understand it — again, I am summarising —
 25 from this section of your witness statement, you left

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1 Herefordshire building control in July 2014 and went to
 2 work for another private company for a number of years;
 3 is that right?
 4 A. That's right, yes.
 5 Q. I think you were a construction manager during that
 6 period.
 7 A. Yes.
 8 Q. In your second witness statement — we don't need to go
 9 to it at this stage, but for the record it's at page 2
 10 {HBC00000051/2}, paragraph 5 — you explain that, in
 11 October 2020, you returned to Herefordshire
 12 building control as a senior project officer; yes?
 13 A. No, not to Herefordshire building control. I returned
 14 to Herefordshire Council, but it's not a role within
 15 building control.
 16 Q. I see. Are you still in that role now?
 17 A. Yes, I am.
 18 Q. In summary, what is that role? What does it involve?
 19 A. Project management. It's about bringing together the
 20 resources, the people and the finance, to make council
 21 projects become a reality, to achieve the objectives of
 22 the council.
 23 Q. I see.
 24 A. Which may be construction-related but may not. It's any
 25 project that has a defined end objective.

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1 Q. I understand. So not a building control role at all?
 2 A. Not at all, no.
 3 Q. I understand. All right.
 4 If we can go back now, please, to your first witness
 5 statement, {HBC00000029/5}, I'm just going to explore
 6 with you a little about the training you received in the
 7 early part of your career.
 8 You have been asked by the Inquiry, at the top of
 9 that page, about training you had undertaken before 2013
 10 in relation to various matters, and specifically you
 11 were asked about training you had received in relation
 12 to the requirements of the Building Regulations and
 13 associated guidance on fire safety, the requirements for
 14 the use of combustible materials over 18 metres, and any
 15 training on fire testing.
 16 If we look at your answer, and if we can move to the
 17 second paragraph, it begins "In early 2004", you explain
 18 there — and, again, I am summarising, so you must
 19 correct me if I have it wrong — that you attended, in
 20 early 2004, a four-day training course on the
 21 Building Regulations. Is that right?
 22 A. Yes, that's right.
 23 Q. I think you say that that training was designed for
 24 those individuals who were completely new to the
 25 building control profession, was it?

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1 A. Yes, yes, it was.
 2 Q. You say — I think it's four lines up from the bottom of
 3 that first paragraph beginning "In early 2004" — that
 4 during that training you were given an overview of the
 5 requirements, 13 at the time in early 2004, in A to N
 6 and all of the associated approved documents; yes?
 7 A. Yes. Yes.
 8 Q. As far as you can remember, Mr Jones, was any particular
 9 priority or focus given to any one of the approved
 10 documents or was it an overview of all of them in more
 11 general terms?
 12 A. It was an overview of all of them in very general terms.
 13 I think in terms of the time spent on each, the larger
 14 approved documents would have justified more time than
 15 some of the simpler ones, but it was a very high-level
 16 overview of the approved documents in the time that was
 17 available.
 18 Q. Yes. I understand. Thank you.
 19 Part of that, obviously, will have included Approved
 20 Document B as it stood at the time?
 21 A. Yes.
 22 Q. You have explained very helpfully that the course itself
 23 was quite high-level in terms of giving an overview of
 24 all of those approved documents; did you at any stage,
 25 as part of that training, read Approved Document B, can

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1 you remember?
 2 A. I can't recall the detail of the course, but from
 3 memory, yes, we would have had Approved Document B open
 4 during the training, so that we could follow the
 5 programme of training that was being delivered.
 6 Q. Yes. All right, thank you.
 7 Did you come to understand at that stage, insofar as
 8 fire was concerned, that the primary function of the
 9 Building Regulations and the guidance in Approved
 10 Document B was to protect life?
 11 A. Yes.
 12 Q. You did.
 13 Talking more generally about your training in the
 14 early part of your career, other than that four-day
 15 training course which we've just discussed, I think you
 16 refer also to a later course on BS 9999, the code of
 17 practice for fire safety in the design, management and
 18 use of buildings; that's at paragraph 3 on page 5 of
 19 your witness statement {HBC00000029/5}. We don't need
 20 to go to it. I think you say there that the focus of
 21 that training was mostly on means of escape, was it?
 22 A. Yes, I seem to remember that BS 9999 was new at that
 23 time and the most significant thing about it in terms of
 24 what had gone before was a different approach to means
 25 of escape, so that's what the training focused on.

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1 Q. Yes, I see.
 2 Other than that, you tell us that your other
 3 learning was on-the-job learning, with support from more
 4 senior colleagues and other members of the team at
 5 Hereford; is that right?
 6 A. Yes, that's right.
 7 Q. Can we go back now, please, to your first witness
 8 statement and to page 5 {HBC00000029/5}. I just want to
 9 look at a particular section of that with you.
 10 If we can go, please, to the penultimate paragraph
 11 on that page, it starts halfway through the third line
 12 beginning, "I had no training", do you see that?
 13 A. Yes.
 14 Q. You say there:
 15 "I had no training specific to the use of materials
 16 in buildings over 18m, or in the testing and
 17 certification of building products and materials.
 18 Please note that there were no buildings with storeys
 19 over 18m in Herefordshire, for me to gain any
 20 'on-the-job' training in areas of design relevant to
 21 such buildings."
 22 Yes?
 23 A. Yes.
 24 Q. Just to ensure that I am clear, what is the period that
 25 you're talking about there? Do you mean up to 2013?

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1 A. The question relates to the time up to 2013, but
 2 actually it would be throughout my career. I have never
 3 worked on buildings over 18 metres in any role.
 4 Q. Yes, and that's essentially because of geography, that
 5 there were and are still no high-rise buildings in
 6 Herefordshire; is that right?
 7 A. That's right, yes.
 8 Q. Thank you.
 9 I want to move on now, please, to Kingspan, and to
 10 the approval certificate that was issued by the LABC for
 11 Kingspan's K15 product in May 2009. We're going to look
 12 in some detail at your role in that; all right?
 13 A. Okay.
 14 Q. I'm going to start with how this work came to you in the
 15 first place.
 16 I think it's right that it came to you through your
 17 line manager at the time, Chris Jenner at Hereford; is
 18 that right?
 19 A. That's right, yes.
 20 Q. Right. As far as you understood it, was it the case
 21 that your line manager, Chris Jenner, by the time the
 22 matter came to you, had already been in touch with the
 23 LABC about a proposed approval certificate for K15?
 24 A. Yes, from emails that I've seen since, that does seem to
 25 be the case, yes.

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1 Q. All right. Let's go to one of those, so that I can help
 2 you with that.
 3 The first one, please, is at {HBC00000049}. If you
 4 look at the top email there — I think this might have
 5 been what you were referring to — we can see an email
 6 from Phil Harrison to Chris Jenner sent on
 7 26 November 2008 at 10.14. Do you see it?
 8 A. Yes.
 9 Q. Phil Harrison worked at the LABC at the time; yes?
 10 A. Yes, he did.
 11 Q. We can see from that email, if you look at his sign-off,
 12 that his title was business development director; yes?
 13 A. Yes.
 14 Q. So looking at the email, Phil Harrison says there:
 15 "Good morning Chris
 16 "Thank you for agreeing to 'take on' this System
 17 Approval for Kingspan."
 18 Just pausing there, if we look back to the subject
 19 line of the email at the top, we can see that it says:
 20 "FW: LABC System Approval for a Walling Detail
 21 incorporating Kooltherm K15."
 22 Do you see that?
 23 A. Yes.
 24 Q. Can we agree, therefore, that it seems clear that the
 25 system approval Phil Harrison is referring to in this

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1 email is the one for K15?
 2 A. Yes.
 3 Q. Thank you.
 4 If you go on to where I had read to in the same
 5 email, Mr Harrison goes on:
 6 "As you have probably already noticed, Andrew Pack's
 7 contact details are at the foot of this string of
 8 Emails."
 9 Then he says:
 10 "Attached, as agreed, for ease of reference is a pdf
 11 of the Type Approval Service Manual, together with
 12 a copy of the Certification Flow Chart."
 13 Yes?
 14 A. Yes.
 15 Q. That first document, the type approval service manual,
 16 is one which we will come back to at a later stage.
 17 For now, is it the case that, at some stage after
 18 this email on 26 November 2008, your line manager,
 19 Mr Jenner, allocated the work of researching and
 20 carrying out this assessment to you?
 21 A. Yes, that's right.
 22 Q. Can you remember how that came about? Was it through
 23 a conversation?
 24 A. I can't recall the detail. I haven't seen any emails
 25 to —

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1 Q. No.
 2 A. — that effect, so I suspect it was verbal.
 3 Q. Yes, all right.
 4 I want to take you back now, please, to your first
 5 witness statement, {HBC00000029/7}. If we look, please,
 6 at the third paragraph beginning, "It is my
 7 understanding" — do you have that?
 8 A. Yes.
 9 Q. I'm just going to read that with you. You say there:
 10 "It is my understanding that Herefordshire Council
 11 was selected by LABC not for reasons of any particular
 12 technical expertise (A Herefordshire Council exercise in
 13 the aftermath of the Grenfell Tower fire confirmed that
 14 there are no buildings in Herefordshire with storeys
 15 over 18m and there was no specific relevant expertise
 16 within the Herefordshire Council building control team
 17 at that time) but because of its proximity to Kingspan's
 18 Pembridge offices."
 19 Yes?
 20 A. Yes.
 21 Q. So just pausing there, in terms of the exercise that you
 22 explain was conducted after the Grenfell Tower fire, and
 23 the confirmation that, at the time, so retrospectively,
 24 there was no specific relevant expertise within the
 25 Herefordshire Council building control team, as far as

16

1 you are aware, is that a matter — the technical
 2 expertise of the team — to which any thought was given
 3 at the time, in late 2008?
 4 A. Yes, it was. It was discussed. I recall that when the
 5 work was first delegated to me, I was reticent about
 6 taking it on, because although I didn't know a lot about
 7 the product at that stage, I could see that it was to do
 8 with material testing and certification and I knew that
 9 that was not within my scope, and that there was nobody
 10 else within Herefordshire Council who had any, you know,
 11 more experience in that area. And, as I remember,
 12 Chris Jenner sort of listened to that and suggested
 13 I call LABC and discuss what they want, and see if what
 14 they were asking for was within our capabilities or not.
 15 So there was some thought given to it, yes.
 16 Q. Yes, I see. So do I understand correctly from the
 17 answer you have just given that you did express your
 18 reticence to your own line manager, Chris Jenner?
 19 A. Yes.
 20 Q. And that, as a result, he made the suggestion that you
 21 call someone at the LABC to discuss it in more detail?
 22 A. Yes. Yes.
 23 Q. Right.
 24 If we can go back, please, to your witness statement
 25 at page 7 {HBC00000029/7}, going on to the fourth

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1 paragraph. This is the one starting "I believe"; do you
 2 see it?
 3 A. Yes.
 4 Q. Thank you:
 5 "I believe the work was delegated to me because at
 6 that time I had a specific role in the team for
 7 marketing activity, and the type approval system was
 8 viewed very much as a marketing tool to raise the
 9 profile of the LABC brand. There was a potential
 10 marketing benefit in this for Herefordshire Council
 11 through its association with the LABC brand."
 12 Yes?
 13 A. Yes.
 14 Q. When you say there, in the second line, that it was
 15 viewed very much as a marketing tool, who had that view?
 16 Just so that I'm clear, do you mean the LABC?
 17 A. I think it was my view, but in my experience, at least,
 18 it was the view of other building control surveyors.
 19 That's how we viewed the type approval system.
 20 A certain amount of the activity within the type
 21 approval system seemed to me to be mirroring perhaps
 22 what companies like the NHBC were offering on
 23 a nationwide basis, and so the activity of LABC was
 24 almost a marketing activity to try and counter that
 25 competition by offering a similar service.

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1 Q. Yes, I see.
 2 So thinking about that paragraph that we've just
 3 read, you believe, do you, that you were essentially
 4 picked because of your role in the team in marketing
 5 rather than for any technical knowledge or expertise?
 6 A. I think that's how it would have begun, because I did
 7 have a specific role for marketing, and this fell into
 8 the marketing category on the face of it.
 9 Q. Right.
 10 A. It would have been the case that I would have been as
 11 experienced in building control generally as anybody in
 12 the Herefordshire building control team at that time,
 13 and perhaps more experienced than most.
 14 Q. Yes, I see.
 15 If we can go back, please, to your first witness
 16 statement and to page 19 {HBC00000029/19}, just thinking
 17 further about this issue and about your understanding of
 18 the purpose of an LABC system or type approval, if we
 19 can go, please, to your answer just under halfway down
 20 the page, under question 29, starting "I understood".
 21 Do you see that?
 22 A. Yes.
 23 Q. If we look at that together, you say:
 24 "I understood it to be primarily a marketing tool.
 25 Many product manufacturers like having their product

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1 associated with and endorsed by the LABC brand. It can
 2 also be said that an LABC system approval certificate
 3 can assist in the product's processing through
 4 building regulations approval, which again can be used
 5 by manufacturers as a marketing benefit ..."
 6 Then you go on to refer to some of Kingspan's
 7 marketing literature, which we might come to a little
 8 later.
 9 Can you just help me — I mean, you may have
 10 answered this, but just in the event that you have any
 11 further detail — how had you come to understand this
 12 process of approval to be primarily a marketing tool?
 13 A. Because, as a local authority building control service,
 14 most of our activity with LABC was for marketing
 15 purposes. LABC were primarily handling marketing
 16 activity that benefitted us as a local authority
 17 council. They were also involved in co-ordinating
 18 training for regional building control groups, but
 19 primarily LABC was a marketing organisation for us, and
 20 so my feeling would have been that anything that came to
 21 us from LABC would be most likely to be marketing
 22 related.
 23 Q. Yes, thank you.
 24 So is it correct for me to say that, in a way — and
 25 you must tell me if I'm not correct — this approval

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1 process in terms of marketing served to benefit
2 everyone: Kingspan would benefit through their
3 association with the LABC brand, the LABC brand would
4 have its profile raised through being promoted as part
5 of Kingspan's marketing literature, and in turn,
6 Herefordshire would benefit through its association with
7 LABC; is that fair?

8 A. I think that's fair to say, yes, yes.

9 Q. What about the reader? It may seem a ridiculous
10 question, but do you think the reader of any approval
11 certificate would have understood those certificates
12 primarily as a marketing tool?

13 A. I think that there would have been some understanding
14 that that was the case. LABC type and system approval
15 certificates were not particularly in—depth, and I think
16 that would have been appreciated by most people reading
17 them. Certainly if I speak as a building control
18 officer, in instances where I came across an LABC type
19 approval certificate for something I was dealing with as
20 part of a Building Regulations approval, I found them to
21 be of very limited value because there are so many
22 project—specific values that you're needing to consider,
23 that the scant information that is in an LABC
24 certificate is of limited value to you in technical
25 terms.

21

1 So I think there would have been a general
2 understanding that it was as much about marketing as
3 anything else, but that's just my opinion.

4 Q. Yes, that's very helpful.

5 So in terms of what you have expressed about finding
6 LABC certificates to be of limited value and not very
7 in—depth, as far as you were aware, thinking about 2009,
8 let's take, is that a view that was shared by others in
9 the building control profession?

10 A. I'm not sure I can answer that, but I believe, yes,
11 I don't believe it was a view that was unique to me.

12 Q. No. Is it something that you remember being discussed
13 amongst colleagues, for example?

14 A. Yes, I believe I do, yes.

15 Q. Do you think, then, it is right that non—building
16 control professionals — so, for example, architects,
17 contractors, builders — would have relied on the terms
18 of LABC approval certificates as independent
19 certification of a product and its compliance or
20 otherwise with the Building Regulations.

21 A. No, I don't believe so. I always viewed the LABC
22 certificates to be more for the benefit of the
23 building control body that was processing an approval,
24 as background information to the work they were doing,
25 rather than something for the designer to rely upon.

22

1 Q. I see. How did you come to that understanding, that
2 they were more for building control than for a designer
3 or an architect to rely on?

4 A. I think it was just a — I felt it was a common
5 understanding at the time, that they were aimed more at
6 the building control bodies.

7 Q. Yes. I just wonder — and it may be that you're not
8 able to answer — if a designer or architect did happen
9 to be reading an LABC approval certificate, would you
10 agree with me that it may not be clear to them that that
11 certificate was designed primarily as a marketing tool;
12 they may take it to be an independent certification of
13 a product's compliance or otherwise with the
14 Building Regulations?

15 A. Yes, I can see that that would be the case, but in any
16 live project, the design would ultimately have to go
17 through all the project—specific approvals with
18 building control. So anything that the designer was
19 relying upon in the certificate would later be vetted by
20 a building control body as part of the approval.

21 Q. Yes, I see. That's at the very end of a project, isn't
22 it? So, given your view of the value of LABC approval
23 certificates, did you see any danger for designers and
24 architects in the long period leading up to sign—off by
25 building control on a project if they were relying on

23

1 the terms of an LABC certificate?

2 A. I would say that anything they relied on in the
3 certificate would be vetted not on completion but during
4 the design approval stage at the beginning of —
5 you know, pre—construction, not at the end of a project.
6 So any issues should come out at that stage, not at
7 completion.

8 Q. Yes, I see.

9 Even if it was your view that LABC type approval
10 certificates were of limited value and perhaps were not
11 terribly in—depth, would you agree, or do you agree,
12 that it would be of the utmost importance that the
13 technical content of any such certificate was clear and
14 accurate?

15 A. Speaking from where we are now, looking back, I agree
16 that, yes, it should be done properly or not at all.

17 Q. Well, forgive me, you said, "Speaking from where we are
18 now, looking back"; did you ever have a different view
19 as to the importance of the content being clear and
20 accurate?

21 A. No, no, I would have felt then that it needed to be as
22 accurate as it could be within the scope of the
23 certificate being done. It was not a — you know, it
24 was a very limited exercise. But, as far as that
25 exercise went, I would have wanted it to be accurate,

24

1 yes. Yes, I wouldn't have been lax about that.
 2 Q. Thank you.
 3 Can we turn now to some correspondence. Again, this
 4 is from the early stage of your involvement in the
 5 certification for K15. If we can go, please, to
 6 {KIN00024985}, and if you look first, please, Mr Jones,
 7 at the second email in the chain, the one sent by
 8 Chris Jenner to Andrew Pack on 26 November 2008. Do you
 9 see it?
 10 A. Yes, I do.
 11 Q. Thank you.
 12 We can see that Mr Jenner says there:
 13 "Hello Andrew,
 14 "We at Herefordshire Council Building Control will
 15 be pleased to work with you on your proposed System
 16 Approval application.
 17 "David Jones will be your dedicated contact in
 18 relation to this application and will contact you in the
 19 near future to discuss the product and process of
 20 achieving approval.
 21 "However, please feel free to contact me anytime to
 22 discuss this or other related matters."
 23 That is your introduction to and first contact with
 24 Andrew Pack, I think, is it?
 25 A. Yes, I believe it was.

25

1 Q. So if we go up to Mr Pack's response, at the top email
 2 in the chain, we can see that he responds on the same
 3 day to both you and Chris Jenner. In the last line of
 4 his email, he asks you to arrange a meeting to discuss
 5 the matter; yes?
 6 A. Yes.
 7 Q. All right.
 8 We're going to come on to that meeting shortly in
 9 quite some detail, but before we do that, I want to ask
 10 you a little more about your understanding at that time,
 11 so before you went to a meeting with Kingspan, about the
 12 approval process itself and what it would involve.
 13 You have explained already that, having expressed
 14 your reticence about this particular project to
 15 Chris Jenner, he suggested to you that you make a call
 16 to the LABC; yes?
 17 A. Yes.
 18 Q. If we can look, in fact, please, at your first witness
 19 statement at page 14 {HBC00000029/14}, at the top of the
 20 page, under the first underlined section, so under the
 21 question, you say this:
 22 "At the outset of the 2009 K15 approval I knew
 23 nothing about the type/system approval process, having
 24 not been involved in it previously. The first thing
 25 I did was to call our contact at LABC for an explanation

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1 on how the process worked, what my part in it should be
 2 and how I should go about doing it."
 3 Then you go on:
 4 "The first thing I was told was that the procedures
 5 were in need of tidying up and that the terminology was
 6 not really appropriate (the term 'Type' dated back to
 7 the system approval of house types for housebuilders,
 8 while the term 'System' was being used for products
 9 rather than systems for want of another name)."
 10 Yes?
 11 A. Yes, that's how I recall the conversation, yes.
 12 Q. Pausing there, can you help us as to when this call took
 13 place? So was it before or after you met with
 14 representatives from Kingspan about K15?
 15 A. I believe it would have been before, because I would
 16 have tried to find out about — well, firstly, I had to
 17 establish whether I was actually going to carry on and
 18 do this work, but in the event that I did, I needed to
 19 find out more about what was involved. So I believe it
 20 would have been before the meeting with Kingspan.
 21 Q. Thank you.
 22 Can I take it from what you have just said that you
 23 actually took the decision as to whether or not to take
 24 on this work during or just after but as a result of
 25 your call with your contact at the LABC? So prior to

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1 that call to the LABC, you were still deciding whether
 2 or not you would accept this piece of work, essentially?
 3 A. Yes. Prior to that call, I think I was veering towards
 4 declining and saying I don't think we are the right
 5 people for this. It was that call, I think, that —
 6 where I was persuaded that, yes, given the scope of
 7 what's required, you can do this.
 8 Q. Yes, I see.
 9 If you had not been persuaded by that call with the
 10 LABC, and if you had decided to decline the piece of
 11 work, would that have been easy for you to do? Would it
 12 have caused any difficulties with your own line manager,
 13 or would you have been perfectly comfortable to decline
 14 it?
 15 A. I had a good relationship with my line manager, I could
 16 speak frankly with him, but I was a conscientious
 17 employee, I had been asked by my manager to do
 18 something, so I think there would have been a drive
 19 internally to try and do what was being asked of me. It
 20 wouldn't have come naturally to me to just throw it back
 21 and say, "I'm not doing this". So there would have been
 22 a conflict there. There would have been a pressure to
 23 try and find a way that, yes, I can do this, if
 24 I believed that I could.
 25 Q. Yes, but an internal or personal pressure because of

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1 your own work ethic, essentially ; yes?
 2 A. Yes, yes.
 3 Q. Just thinking about the meeting with Kingspan, if it
 4 does help — I think it might help to date it. If we
 5 can go, please, to {KIN00024987}. This, Mr Jones, is
 6 really just to help you to set the timeline in context.
 7 This is quite a long series of emails between you
 8 and Mr Pack on 26 and 27 November 2008, once you have
 9 been introduced to him, and I don't think we need to go
 10 through them all, because if we look to the top email,
 11 we can see there that it appears that a meeting date has
 12 been settled between you for Friday, 5 December at
 13 2.00 pm. Do you see that?
 14 A. Yes, I do.
 15 Q. Would that date accord with your recollection of when
 16 the meeting with Kingspan took place?
 17 A. That would sound right to me, yes.
 18 Q. You think that the call you had with your contact at the
 19 LABC came before that meeting on 5 December 2008?
 20 A. I believe so, yes.
 21 Q. While we're on this email, could you just take a look,
 22 please, at the second email in the chain which is sent
 23 by you to Mr Pack at 10.02 on 27 November. Do you see
 24 that?
 25 A. Yes.

29

1 Q. In the last sentence of your email, you say this :
 2 "I haven't been onto the Kingspan site in a while —
 3 should I just come to the main reception?"
 4 Had you been to Kingspan's site at Pembridge
 5 previously?
 6 A. I had just once, I believe. I seem to remember they had
 7 some outline proposals at one time to extend one of
 8 their warehouses, and I was asked to come out and do
 9 a site visit to see what the potential for that would be
 10 in terms of the Building Regulations.
 11 Q. I see.
 12 If we can go back now to think about the call that
 13 you made to the LABC, in terms of who that was, I think
 14 you tell us in your first witness statement — and we
 15 don't need to go to it — that you can't recall who it
 16 was at the LABC that you spoke with.
 17 A. No, I can't.
 18 Q. And is that still the case now?
 19 A. It's still the case. Having seen the emails which show
 20 that it was, I believe, Phil Harrison that made the
 21 first contact with Chris Jenner —
 22 Q. Yes.
 23 A. — I think it's likely that I would have picked up the
 24 phone to Chris — sorry, to Phil Harrison, but whether
 25 he took the call, whether somebody else fielded the call

30

1 or whether he passed me on to somebody else, I can't
 2 say, I can't recall.
 3 Q. All right, that's helpful. That was going to be the
 4 next question: in terms of your involvement, in the
 5 period prior to 5 December, I think the only person from
 6 the LABC with whom you had had written contact was
 7 Phil Harrison, wasn't it?
 8 A. Yes, that seems to be the case.
 9 Q. Right.
 10 Can we go back now, please, again to your first
 11 witness statement and to page 15 {HBC00000029/15}. If
 12 we look to the section under question 19, so beginning,
 13 "I cannot really answer", do you see that?
 14 A. Yes.
 15 Q. I just want to read that with you.
 16 You have been asked what assessment of the product
 17 or system was normally or should be carried out, and
 18 your answer is this :
 19 "I cannot really answer for what would have been
 20 normal as this was the first time I had been involved in
 21 an approval, but I did seek advice in the initial
 22 contact with LABC as to what level of assessment was
 23 expected, and how it should be approached."
 24 Then going on, you say:
 25 "I was told that the assessment should not be

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1 particularly in—depth, and should consist of an initial
 2 meeting with the client, followed by a review of
 3 manufacturers details and any third party certification
 4 to assess the product attributes and the way it could be
 5 used. Where the third party guidance is deemed reliable
 6 there would be no need to dig any deeper and the
 7 statements therein could be accepted at face value."
 8 Is that right?
 9 A. That was certainly my recollection, because it was quite
 10 significant in terms of the decision to agree to take on
 11 that work in the end. I was — I knew enough about
 12 sort of the testing and certification of products that
 13 I knew there would be an awful lot of test reports and
 14 testing standards involved, and I knew that that was not
 15 within my expertise. So being told that actually the
 16 key thing is this product has a BBA certificate, the BBA
 17 have already done all that checking and vetting of all
 18 the test information and you can use that information,
 19 that was quite important to me. It was quite
 20 significant that actually I was able to use
 21 a BBA certificate and not have to verify the information
 22 that was within it.
 23 Q. Yes, I see. So is it your recollection that your
 24 contact at the LABC during that call specifically
 25 mentioned the existence of a BBA certificate for the

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1 product?

2 A. Yes, I do recall that that was quite important, yes.

3 Q. Yes. When you say that it was significant, do

4 I understand correctly that it was significant that this

5 was mentioned because it provided you with some

6 reassurance that you were not going to be required to go

7 deep into areas of complex testing and standards which

8 were not within your expertise?

9 A. That's right, yes.

10 Q. Can we go back, please, to the paragraph we've just

11 looked at in your witness statement on page 15

12 {HBC00000029/15}. If we look, please, at the second

13 paragraph starting, "I was told", that we've just read,

14 at the end there you say:

15 "Where the third party guidance is deemed

16 reliable ..."

17 I think this is what you were told during the call.

18 Just so that I'm clear, as far as you understood it,

19 who was to decide whether or not third-party guidance

20 was reliable? Was that for you to decide or the LABC?

21 A. I believe it was guidance given by the LABC that a UKAS

22 accredited certification body could be deemed reliable

23 and that mirrored industry practice, really, that there

24 were certain certification bodies, the BBA being the key

25 one, that across the industry were viewed with this

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1 level of trust, that actually you could take the content

2 of a BBA certificate and trust that it was reliable.

3 Q. Yes. In terms of those certification bodies and the

4 view across the industry or industry practice in terms

5 of reliance and levels of trust, you said in that answer

6 that the BBA were the key organisation. What were the

7 others at that time, as far as you are aware, Mr Jones,

8 who were viewed or whose certificates were viewed with

9 that degree of trust?

10 A. I believe there was reference in the LABC guidance to

11 UKAS accredited certification bodies. I couldn't tell

12 you what others there were. The BBA was the one we came

13 across almost universally in that context.

14 Q. Yes. And I think the reference to UKAS accredited

15 organisations comes in the LABC manual, which we will

16 come on to a little later.

17 As far as you are aware — and you may have answered

18 this — were there any third-party certification bodies

19 or organisations in 2009 whose certificates or guidance

20 would not be deemed reliable, or would that depend on

21 whether or not they were UKAS accredited?

22 A. I think it would depend on whether they were UKAS

23 accredited. I can't recall any that I would have said

24 were not reliable, but I can't recall any alternatives

25 at this time.

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1 Q. No.

2 A. No.

3 Q. Yes, can we go back, please, to your first witness

4 statement, and this time to page 34 {HBC00000029/34},

5 please. If we go to the first paragraph that is not

6 italicised, beginning "These statements", you're talking

7 here about a presumption of compliance or the degree of

8 trust that you've just described to us that was placed

9 in the content of BBA certificates. You say there:

10 "These statements are consistent with the brief

11 I was given in 2009 by LABC, and if there were doubts

12 about the content of the BBA certificate it would have

13 been for LABC as the scheme administrator to question

14 this."

15 Yes?

16 A. Yes.

17 Q. You then go on — this is really what you have just

18 described — to say:

19 "This view of the status of BBA certification as

20 a trusted source of reliable information was consistent

21 with the way they were viewed in the wider

22 building control profession, not just in type

23 approvals."

24 Is that right?

25 A. Yes, that was my experience.

35

1 Q. My understanding is that during your call with the LABC,

2 and against the background that you understood the BBA

3 to be a trusted and reliable source and that that was

4 the general view, you have told us that assertions made

5 within a BBA certificate you were to take at face value;

6 yes?

7 A. That was my recollection, yes.

8 Q. I just want to ask about that practice or your

9 understanding of that.

10 Was there not a risk, if you were to take that

11 approach, in just accepting at face value statements

12 within another third-party certificate, that an error

13 could end up being perpetuated? Does that make sense?

14 A. Yes. Yes, it does make sense, and yes, it is the risk.

15 When one certificate is based on another, anything

16 inaccurate in the first certificate will naturally be

17 reflected in the second one.

18 Q. Yes, because if every third-party certification

19 organisation took that approach, one early error could

20 end up being perpetuated on and on and on and on,

21 couldn't it?

22 A. Yes.

23 Q. It becomes a bit of a house of cards, possibly.

24 A. Yes.

25 Q. Do you think that's fair?

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1 A. I think that's fair to say, yes. Yes.
 2 Q. Is that a risk to which you gave consideration at the
 3 time of your call with the LABC, or afterwards at any
 4 stage?
 5 A. I had no reason at that time to doubt what was in the
 6 BBA certificate, and I'd been told, "This really is what
 7 you should base your assessment on". So I don't think
 8 I fully considered that risk at that time. I think
 9 I was — I accepted the logic that the information that
 10 I put forward could be based on the BBA certificate.
 11 I remember questioning, both with LABC and with
 12 Kingspan, that, actually, what is the point of this? If
 13 all I'm doing is taking a BBA certificate and
 14 reformatting it, if you like, re-presenting that
 15 information, which is essentially what the brief was
 16 about, what's the point of it? What's it going to
 17 achieve? If they've already got a BBA certificate,
 18 surely that gives Kingspan everything they need. But
 19 I didn't consider — I wouldn't have expected there to
 20 be a risk of grave errors in the BBA certificate then.
 21 It just wasn't how we viewed the BBA at that time.
 22 Q. No. I appreciate that it's your evidence that you had
 23 no particular reason to doubt any of the technical
 24 content of the BBA certificate. I suppose really, out
 25 of interest and given your profession, what I am trying

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1 to understand is whether, in terms of the wider risk of
 2 the practice of simply repeating assertions made within
 3 one third-party certificate in another, in 2008 and
 4 2009, did you give consideration to that wider risk that
 5 an error, not necessarily in the BBA certificate for K15
 6 you were dealing with but an error, could end up being
 7 perpetuated endlessly?
 8 A. I imagine I would have given some consideration to it,
 9 I can't recall in what way, but certainly as part of the
 10 process I sent my report off to LABC, who I understood
 11 were going to get it checked and verified through their
 12 network, and I sent it to Kingspan for an accuracy
 13 check. So clearly in my mind it was something that —
 14 even though in my mind I was only re-presenting
 15 information that had already been established by the
 16 BBA, I did clearly feel it needed another level of
 17 checking, so I didn't just — yes, I didn't just put it
 18 forward and say, "Because it's from the BBA, it must be
 19 right". I think I put it forward to say, "This is based
 20 on the BBA certificate, but please review it and see if
 21 you agree that it is accurate". So I suppose that's the
 22 only context in which I questioned what I was doing in
 23 that respect.
 24 Q. Yes. Thank you.
 25 Just going back to something you said a short while

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1 ago, that you questioned both with the LABC and
 2 Kingspan, "What is the point of this? If I'm just
 3 essentially replicating what is already in
 4 a BBA certificate, what's the point of doing it at all?"
 5 Is that fair, is that what you were asking?
 6 A. That was one of my early questions, yes, yes.
 7 Q. Because in a way — and you must tell me if I'm wrong —
 8 the impression I have is that you understood yourself to
 9 be being asked to do a bit of a cut and paste job; is
 10 that fair?
 11 A. Yes, I think that probably does describe it. I was to
 12 go and meet with Kingspan, take the information they
 13 gave me verbally, take the BBA certificate, extract the
 14 information, filter out the parts of it that didn't
 15 relate to the Building Regulations, and just re-present
 16 it in a format that sort of matched the
 17 Building Regulations A to B.
 18 Q. Yes.
 19 A. That was re-presenting information, yes.
 20 Q. Yes. I'm sorry, I spoke over you.
 21 Am I right to say that it was that understanding
 22 that reassured you enough to accept the job?
 23 A. Yes, that was a key part of it. It was — when I say in
 24 one of my written responses that I was told it was not
 25 to be a particularly in-depth assessment, that's what

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1 I meant really, that actually I was only taking this
 2 information and re-presenting it, I did not need to dig
 3 beyond it to verify that information, and that was very
 4 important to me in terms of: well, can I actually do
 5 this or not?
 6 Q. Yes.
 7 You say that you raised this, this is one of the
 8 first questions you asked in your call with your contact
 9 at the LABC, and, Mr Jones, when you asked that
 10 question, "What is actually the point of this?", what
 11 was the response, can you remember?
 12 A. From LABC, I can't recall in detail, but I think, to the
 13 best of my recollection, that what they said was, "Well,
 14 go and speak to Kingspan and find out from them what
 15 they want to achieve from it, what's the point of it for
 16 them, because they're the ones paying for this service",
 17 and —
 18 Q. Yes.
 19 Then, as I understand it from your previous answer,
 20 you did ask Kingspan at your meeting, "What is the point
 21 of this?"
 22 A. Yes, yes.
 23 Q. Can you remember — we're going to come, I'm afraid,
 24 back to that meeting in some detail, but just on this
 25 point — what the answer was to that question during the

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1 meeting with Kingspan?
 2 A. My recollection was they were very keen to be associated
 3 with the LABC brand. They said, "We like working with
 4 LABC, we would like to be able to put the LABC brand on
 5 our marketing, we would like it associated with our
 6 product". So, again, it links back to this marketing
 7 aspect of the process.
 8 Q. Yes, all right, thank you.
 9 In fact, I think if we can go back, please, to your
 10 first witness statement and to page 19 {HBC00000029/19},
 11 if we look, please, just under halfway down the page,
 12 under question 29, you say there, halfway though the
 13 first line:
 14 "Many product manufacturers like having their
 15 product associated with and endorsed by the LABC brand."
 16 That's essentially what you have just explained.
 17 That was your impression of Kingspan's view, was it,
 18 during your meeting?
 19 A. Yes, in terms of the question of what is the point of
 20 this when you already have a BBA certificate, yes.
 21 Q. Yes.
 22 Then at the next sentence you say — I'm sorry, we
 23 have already looked at this section, but to go back to
 24 it:
 25 "It can also be said that an LABC system approval

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1 certificate can assist in the product's processing
 2 through building regulations approval ... "
 3 Yes?
 4 A. Yes.
 5 Q. As far as you can recollect, were the Kingspan
 6 representatives at your meeting on 5 December aware of
 7 that aspect of having an LABC approval certificate, that
 8 it could make the passage through building control
 9 easier?
 10 A. Oh, I believe they were, yes.
 11 Q. Do you remember that actually being discussed?
 12 A. I can't remember the detail of the discussion, but
 13 I find it hard to believe — in introducing the system
 14 approval to them, I find it hard to believe that that
 15 wasn't discussed.
 16 Q. So do you think that you explained that to them in
 17 introducing the system approval process at the meeting?
 18 A. I think I would have, yes.
 19 Q. All right, thank you.
 20 Can we go now back to your first witness statement
 21 again and this time to page 15 {HBC00000029/15}. I want
 22 to come back to a couple of other matters in relation to
 23 your initial call to the LABC before you decided to
 24 accept this piece of work.
 25 At the final paragraph of this page, beginning "One

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1 of the first " — do you see that?
 2 A. Yes.
 3 Q. You say there:
 4 "One of the first questions I had for LABC was how
 5 I could go about considering background information to a
 6 'system' approval when K15 was just one element of
 7 a rainscreen cladding system. As far as I recall, this
 8 was something I was told not to worry about that, and
 9 that I was just to describe the product, explore what
 10 systems it might be part of and assess it on the
 11 assumption that all other parts of the system complied
 12 with the relevant guidance in their own right."
 13 Is that correct?
 14 A. Yes, that's as I remember it, yes, and I think this
 15 possibly links back to an earlier part of that
 16 conversation where they talked about the terminology
 17 being wrong, that, "Actually it's system approval but
 18 we'd like to call it something else, but for the moment
 19 we're stuck with this because it's what we've got".
 20 But, yes, I think I was told, "Don't worry about the
 21 tag 'system approval', you're just — you know, just
 22 look at what you've got in front of you".
 23 Q. Yes. Had that been a worry for you?
 24 A. Yes, I think when I — before I went to meet — before
 25 I did anything with this, I seem to remember I looked up

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1 the product, probably on the Kingspan website, and
 2 I seem to remember my first impression, looking at the
 3 diagrams, was that perhaps Kingspan made an entire
 4 system, perhaps they made a cladding product and
 5 a system of cavity barriers, but as I got deeper into
 6 it, I could see that the only product that was defined
 7 was the K15, so this was — I wrangled with this quite
 8 a lot: how can I do a system approval, I don't know what
 9 the system is? As a building control officer, I was
 10 looking at this perhaps as I would a
 11 Building Regulations approval for a live project, where
 12 I can't approve things without knowing what they are.
 13 Q. Yes.
 14 A. So this was a difficult one for me at that stage, yes.
 15 Q. I understand.
 16 When the person you were speaking with at LABC told
 17 you not to worry about that, did that completely satisfy
 18 your concerns about this aspect of this particular
 19 approval?
 20 A. I wouldn't say it completely satisfied my concerns, but
 21 of course I was going to this meeting with Kingspan some
 22 days later, and so I suppose it satisfied my concerns
 23 enough at that stage to go on to the meeting with
 24 Kingspan and find out more about how it would — might
 25 work.

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1 Q. I see.
 2 Can we go back now, please, to page 27 of your first
 3 witness statement {HBC00000029/27}. If we can go to the
 4 third paragraph, or the second non—underlined paragraph,
 5 please, which starts "I sought advice". Do you have
 6 that?
 7 A. Yes.
 8 Q. I'm going to read that. You say there — I'm so sorry,
 9 I should have put it in context. We can see from the
 10 paragraph above that this is about advice you were
 11 seeking from the LABC, so prior to the meeting with
 12 Kingspan.
 13 You say there:
 14 "I sought advice mainly on a) the procedure for type
 15 approvals and Herefordshire Council's part in it, b) how
 16 they thought I should go about the assessment, c) how in
 17 depth the assessment should be, given my level of
 18 experience d) how it was possible to undertake a
 19 'system' approval when only one part of the system (K15)
 20 is known and e) what the point of a system approval
 21 would be for a product which already has BBA
 22 certification ."
 23 Yes?
 24 A. Yes.
 25 Q. So I think we've covered now together a number of those.

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1 I just want to ask you about this: looking at (c),
 2 "how in depth the assessment should be, given my level
 3 of experience", do you mean there that you told your
 4 contact at the LABC about your level of experience with
 5 type approvals and in terms of this product? Were you
 6 clear about that, about your own lack of experience?
 7 A. I believe I would have been, yes. You know, I started
 8 this conversation angling towards not doing this work,
 9 towards declining it, and I've no doubt that I would
 10 have been clear on why. I wasn't — I didn't have any
 11 experience in the testing and certification of
 12 materials, I didn't have working knowledge of test
 13 standards, and I believe I would have explained that to
 14 them, in giving my reasons why, "I don't think we can do
 15 this for you".
 16 Q. Oh, I see. So you were perfectly open with the LABC
 17 contact about the fact that you were hesitating as to
 18 whether or not to take on the work?
 19 A. Yes, I believe I was, because at the start of the
 20 conversation, I think that's how I was thinking.
 21 Q. Yes. And what was that person's reaction to that and to
 22 the information you gave about your own lack of
 23 experience in that particular area?
 24 A. I just remember this BBA certificate being the key
 25 factor, that, "No, it's okay, don't worry, it's got

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1 a BBA certificate", and that was it. That was the
 2 answer really.
 3 Q. Yes, I see. So as far as you can recollect, is it fair
 4 for me to say that whoever it was that you were speaking
 5 with at the LABC did not express any concern about your
 6 level of experience?
 7 A. No, not that I recall. No, I ... and I think I would
 8 have been clear. And LABC themselves, we worked with
 9 LABC, as I say, in marketing and training terms, so
 10 I think the LABC contact would have had a good idea what
 11 our capabilities at Herefordshire Council would be from
 12 those previous activities.
 13 Q. Yes, I see, you were not unknown to one another.
 14 A. No, no.
 15 Q. I understand.
 16 I'm going to move on now, we're going to start to
 17 look at the meeting with Kingspan which we think took
 18 place on 5 December 2008. All right?
 19 A. Right.
 20 Q. Prior to the meeting, I think you said that you might
 21 have looked at Kingspan's own website to look at the K15
 22 product; is that right?
 23 A. I believe so, yes.
 24 Q. And we also know that you had your initial call with
 25 your LABC contact.

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1 A. Yes.
 2 Q. Before the meeting with Kingspan, was there anything
 3 else that you did to prepare for that meeting or to gain
 4 some more knowledge about what you were going into?
 5 A. Not that I can remember. I think that meeting with
 6 Kingspan was intended to be an enlightening experience,
 7 if you like. That was part — you know, much of the
 8 reason for the meeting was to find out more about the
 9 product and what Kingspan wanted to achieve.
 10 Q. Yes. So when you say that you were going to be
 11 enlightened at the meeting, is this right, just so that
 12 I'm clear: you were looking to hear more about their
 13 product, obviously, from Kingspan, and as to what their
 14 aims were in seeking LABC approval at all; is that
 15 right?
 16 A. Yes, that's right.
 17 Q. Right.
 18 If we can go to your first witness statement again,
 19 please, and to page 9 {HBC00000029/9}, if we look at the
 20 penultimate paragraph starting, "To the best", do you
 21 see that?
 22 A. Yes.
 23 Q. If we look at that, you say there:
 24 "To the best of my recollection, Andrew Pack led
 25 that meeting for Kingspan, and I recall there being at

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1 least one other person from Kingspan in attendance, but
 2 I cannot remember names without having any contemporary
 3 records to refer to. There was nobody in attendance
 4 from LABC."
 5 Yes?
 6 A. Yes.
 7 Q. Philip Heath of Kingspan has confirmed that he was
 8 present at the meeting. Does that sound right to you?
 9 A. Yes, yes, it does.
 10 Q. Looking in that same paragraph, you say in the top line
 11 that Andrew Pack led that meeting for Kingspan. I want
 12 to ask you about that, because Mr Pack was asked about
 13 this in his evidence to the Inquiry — I don't want to
 14 take you to it, but for the record this was at
 15 {Day86/128:23–25} — and his evidence was that he would
 16 not say that he led the meeting. He also talked
 17 a little in the same section of the transcript about
 18 having been the person who met you at reception, and
 19 said that he could not remember who between him and his
 20 colleague Philip Heath did most of the talking.
 21 So just to get your recollection, when you say there
 22 that Andrew Pack led the meeting, can you help us more
 23 specifically as to what you mean by that?
 24 A. Yes. When I say he led the meeting, he set the meeting
 25 up, he met me at reception, he took me to the meeting

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1 room, made the introductions and sort of started the
 2 meeting off. So he did everything that you might expect
 3 the chair of a meeting to do.
 4 I would say that once we were sat around the table,
 5 the three of us, it would have been probably much more
 6 informal. It wasn't a structured meeting as such. So
 7 during that discussion, I think Andrew and Philip Heath
 8 could have spoken equally. I wouldn't say — I couldn't
 9 say for certain that Andrew did more talking than Philip
 10 or vice versa. I think it was a very informal
 11 round—the-table discussion at that stage.
 12 Q. Yes, I see.
 13 How long did the meeting go on for, can you
 14 recollect?
 15 A. I don't recall, no. I can get some indication from the
 16 fact that the meeting appears to have been at 2.00 pm.
 17 Q. Yes, on a Friday.
 18 A. Yes, that perhaps it was a couple of hours, but I'm only
 19 speculating there.
 20 MS TROUP: Yes, all right, thank you.
 21 If we can pause there for a moment, Mr Jones.
 22 Mr Chairman, I'm looking at the time, and I realise,
 23 it's a little early, but I've come to a good place for
 24 us to take a break if you thought that appropriate.
 25 SIR MARTIN MOORE–BICK: Well, it would be better to break

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1 now, wouldn't it, a bit early, rather than break up
 2 a line of questioning?
 3 All right. Well, I said we would have a break about
 4 11.15, Mr Jones. It's a bit early, but we'll take it
 5 now anyway.
 6 We will come back, please, at 11.25, and I would ask
 7 you, please, not to talk to anyone about your evidence
 8 or anything relating to it while we're on the break.
 9 All right?
 10 THE WITNESS: Yes.
 11 SIR MARTIN MOORE–BICK: Thank you very much.
 12 THE WITNESS: Thank you.
 13 (11.10 am)
 14 (A short break)
 15 (11.25 am)
 16 SIR MARTIN MOORE–BICK: Welcome back, everyone. We're now
 17 going back to Mr Jones to continue taking his evidence.
 18 Mr Jones, welcome back. Are you there? Can you see
 19 me and can you hear me?
 20 THE WITNESS: I can see you. My screen has gone off full
 21 screen, for some reason.
 22 SIR MARTIN MOORE–BICK: Right, well, if you go to the top
 23 right-hand corner, there should be a button that says
 24 "View".
 25 THE WITNESS: Oh, yes. There we are. Yes, that's fine.

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1 SIR MARTIN MOORE–BICK: I'm afraid you have to reset that
 2 every time we have a break.
 3 Otherwise all right?
 4 THE WITNESS: Yes, thank you.
 5 SIR MARTIN MOORE–BICK: And ready to carry on are you, yes?
 6 THE WITNESS: Yes.
 7 SIR MARTIN MOORE–BICK: Thank you.
 8 Ms Troup, when you're ready.
 9 MS TROUP: Thank you, Mr Chairman.
 10 Mr Jones, we're going to go back to the meeting you
 11 had with Kingspan, and we'll be on that for a little
 12 while.
 13 If we can go back to your first witness statement,
 14 please, page 9 {HBC00000029/9}, at the very end of that
 15 page, in the final line, you say this:
 16 "From memory, the main themes of that meeting
 17 were ..."
 18 And then going over the page, please
 19 {HBC00000029/10}:
 20 "The Kingspan representatives gave an overview of
 21 the product and its properties, and how/where it was
 22 intended to be used. In particular, the technical
 23 representatives were enthusiastic about the fire testing
 24 that Kingspan had commissioned for K15, and the fact
 25 that it had been shown to be suitable for use in

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1 buildings with storeys over 18m."
 2 Just stopping there, please, and taking that
 3 information step by step, can you remember what either
 4 Philip Heath or Andrew Pack said to you in terms of
 5 their overview of the product?
 6 A. It's purely from memory, and it is difficult 12 years
 7 later, but —
 8 Q. Yes.
 9 A. — my impression of it was that it quite closely
 10 mirrored what was in their technical literature in terms
 11 of, you know, where this product should and could be
 12 used, and what it was used for.
 13 Q. Yes. So just to that I'm clear, did you have their
 14 technical literature before you arrived at the meeting?
 15 A. I know I'd seen it before the meeting and, as I said,
 16 before, I'm fairly sure I'd looked the product up when
 17 this first came to me from Chris Jenner.
 18 Q. Yes.
 19 A. My best recollection is that they also handed me copies
 20 of the technical literature and the BBA certificate on
 21 the day, but I would, I believe, have seen whatever was
 22 on their website ahead of that meeting.
 23 Q. Yes, and your recollection in general terms is that what
 24 they told you in terms of an overview of the product
 25 accorded with what is said about the product in their

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1 marketing literature which you had seen previously; yes?
 2 A. Yes, yes.
 3 Q. All right. We are going to come on to that literature.
 4 For now, still looking at the paragraph in your
 5 witness statement that we've just read, when you say in
 6 the third line that the technical representatives were
 7 enthusiastic about the fire testing for the product, are
 8 you able to be more specific? What was it that denoted
 9 enthusiasm to you?
 10 A. I think, from memory, it was just their demeanour when
 11 talking about that aspect of it, you know, this was
 12 something quite significant about the product. And not
 13 a new thing. I want to be clear that, as far as I was
 14 being told at the time, this product had been — was
 15 being marketed for buildings over 18 metres and had been
 16 for some time, so it wasn't a new thing, but it was
 17 significant to them and, of course, the BBA certificate
 18 was the most recent development that allowed them to be
 19 perhaps a little more enthusiastic about it.
 20 Q. Did they tell you during the meeting, as far as you can
 21 remember, what you have just explained, that this wasn't
 22 new and that K15 had been being marketed for
 23 over—18—metre use for some time?
 24 A. I recall being aware of that at that meeting, yes.
 25 Q. I see. Did they make you aware at the meeting that the

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1 BBA certificate had been fairly recently issued, or was
 2 that something you already knew?
 3 A. I think I already knew that at that stage, but I think
 4 it's quite likely that they talked about it. It was
 5 obviously one of the documents they gave me and I think
 6 they would have handed it to me as, "Here's our new
 7 BBA certificate".
 8 Q. Yes.
 9 Mr Jones, am I correct in thinking that there were
 10 two documents handed to you during the meeting: the
 11 BBA certificate, which we will come on to, and the
 12 product or marketing literature for K15?
 13 A. Yes.
 14 Q. Were there any others handed to you at that time?
 15 A. No. No.
 16 Q. Again, I'm afraid we will need your witness statement
 17 back up, please, and to page 10 {HBC00000029/10}. Going
 18 back, please, to the paragraph I had just read to you,
 19 in the third line we've discussed the enthusiasm and how
 20 you formed that impression, and you then use the words,
 21 in terms of their enthusiasm, "about the fire testing
 22 that Kingspan had commissioned for K15".
 23 Just so that I am clear, was that a reference, as
 24 you understood it at the time, "fire testing that
 25 Kingspan had commissioned", to tests that had already

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1 taken place or to tests that they had commissioned and
 2 were coming up in the future?
 3 A. My understanding would have been tests that had already
 4 been taken place and were described in the
 5 BBA certificate.
 6 Q. I see.
 7 Do you remember what those tests were as they were
 8 described to you in the meeting?
 9 A. I can't recall what they said about them in the meeting.
 10 I believe I was referred to the BBA certificate where
 11 the tests were listed and described. Certainly
 12 I believe the BR 135 test or the test that led to that
 13 would have been discussed, because that was a key part
 14 of what they were presenting to me. I can't recall the
 15 detail about what they said about those tests.
 16 Q. No, all right.
 17 I want to just take you to some of Kingspan's
 18 evidence about what you have said here about their
 19 enthusiasm about fire testing, and to ask you about it.
 20 If we can go, please, to the transcript at
 21 {Day86/122:23}. This is the evidence of Andrew Pack,
 22 and essentially the section of your statement that you
 23 and I have just read was read to Mr Pack, and he was
 24 asked whether he remembered that. That's at line 22.
 25 Do you see that?

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1 A. Yes, I do.
 2 Q. His answer was this:
 3 "Answer: I don't remember being enthusiastic, no.
 4 "Question: Do you think he is wrong about that?"
 5 "He" being a reference to you. Mr Pack's answer,
 6 which will go over the page, was:
 7 "Answer: All I can recall is that we had brought
 8 along to the meeting a copy of our K15 product
 9 literature, and we brought along with us our
 10 BBA certificate. We brought no fire testing data into
 11 the meeting."
 12 Then he goes on:
 13 "Answer: So I couldn't have been very enthusiastic
 14 about fire testing data if I had nothing in front of
 15 me."
 16 That was his answer.
 17 Can I take it from what you have said that you would
 18 say that he is not right about that?
 19 A. About being enthusiastic, sorry?
 20 Q. Yes.
 21 A. I suppose enthusiasm is subjective, but certainly it was
 22 my impression that the 18-metre factor and the BR 135
 23 and the testing behind it was significant enough to them
 24 that it was worthy of emphasis, which I took as a level
 25 of enthusiasm.

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1 Q. Yes.
 2 A. It was certainly emphasised as the key feature of the
 3 product.
 4 Q. Mr Jones, I know it's difficult, as you have said it's
 5 some years ago; can you remember which of Andrew Pack or
 6 Philip Heath were enthusiastic in the way that you have
 7 described, or was it both?
 8 A. I'm sorry, I can't recall who said what.
 9 Q. All right.
 10 If we can go back to your witness statement, please,
 11 and to page 10 {HBC00000029/10}, at the second paragraph
 12 there you say this:
 13 "I asked what Kingspan hoped to achieve from the
 14 LABC type approval process, given the supporting
 15 information they already had in the form of test results
 16 and a BBA certificate. The response was that it was
 17 very much a marketing aim to have the LABC brand
 18 associated with their product, and they wanted the
 19 opportunity to further emphasise the suitability of K15
 20 in buildings over 18m, again for marketing purposes."
 21 Yes?
 22 A. Yes.
 23 Q. All right. Looking at what you say there in the second
 24 line, "the supporting information they already had in
 25 the form of test results and a BBA certificate", I think

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1 you may have answered this, but are you able now to say
 2 what test results as supporting information you
 3 understood them to have at the time of the meeting? And
 4 to be absolutely clear, I'm talking about for the use of
 5 the product over 18 metres.
 6 A. Only the test results that were listed in the
 7 BBA certificate and the reference to BR 135 that
 8 accompanied those results.
 9 Q. All right. We'll come on to those.
 10 Did you actually look through the BBA certificate
 11 and the tests that are listed within it during the
 12 course of the meeting?
 13 A. I'm not sure. I certainly wouldn't have been able in
 14 that meeting to properly read and digest the
 15 BBA certificate, you know, it was a discussion rather
 16 than an opportunity to read.
 17 Q. Yes.
 18 A. So I don't suppose I would have read the BBA certificate
 19 in detail until I came away from that meeting, but it's
 20 possible, I suppose, that they directed me towards
 21 specific paragraphs during the meeting. I can't really
 22 remember the detail after all this time.
 23 Q. No, all right.
 24 Did you ask, during the meeting, to see any of the
 25 test results or reports that they were referring to?

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1 A. I didn't at the meeting, no.
 2 Q. Did you at any other time?
 3 A. No.
 4 Q. Why did you not?
 5 A. We've talked earlier about the fact that I knew only too
 6 well that I didn't have working knowledge or experience
 7 in testing of products, test standards, and that I was
 8 basing my summaries on the conclusions within the
 9 BBA certificate. Had I asked for the test reports,
 10 I suppose the question is: what would I have then been
 11 looking to do with those test reports? Because to
 12 analyse those test reports would have been a very
 13 different exercise, to analyse the test conditions, to
 14 compare them to the test standards on which they were
 15 based, to interpret the results and, if necessary,
 16 challenge or ratify the results. That's a process that
 17 was way outside of my expertise at the time. So
 18 I suppose it begs the question: what's the point in
 19 asking for the test reports unless I'm going to go
 20 through that process? Which I know I'm not going to be
 21 able to.
 22 So, again, if we link back to the brief given to me
 23 by the LABC at the very start, where I'm being told,
 24 "Actually, you don't need to dig down and verify the
 25 test results because the BBA have already done that for

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1 us, and you can take their summaries and conclusions as
 2 read".
 3 Q. Yes, I see.
 4 So I think this is right, isn't it: at no stage did
 5 you see any test data or test reports for K15 before the
 6 May 2009 LABC approval certificate was issued?
 7 A. No, I didn't.
 8 Q. Is this what you're explaining — please do correct me
 9 if I have this wrong — during the meeting, or at any
 10 other time, you did not ask for any evidence at all that
 11 the tests had been carried out, because by the time of
 12 the meeting you had already reached a decision that you
 13 would not read or analyse those reports and therefore
 14 there was no point in requesting them? Is that what
 15 you're saying?
 16 A. I think that is true. I'd been told during that initial
 17 contact with LABC that that wasn't part of my brief,
 18 I wasn't required to do that, because the BBA had
 19 already done — been through that process, they'd
 20 already done that.
 21 Q. Yes.
 22 Even if you understood that it wasn't a requirement,
 23 did you consider at all asking to see the underlying
 24 test reports just to have the background in case you
 25 wanted to refer to them when you were carrying out your

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1 assessment?
 2 A. I can't recall whether I considered it, but I didn't
 3 feel it appropriate, because I suppose if I took the
 4 test reports and did not raise a query with them, didn't
 5 challenge them, then by implication I'm accepting their
 6 accuracy, but I knew that I wasn't competent to do that,
 7 to accept their accuracy. So I think — again, and in
 8 my mind I'd been told I didn't need to check the
 9 reports, I didn't need to actually check the underlying
 10 results, so I had that in my mind, that I was doing —
 11 basically doing what had been asked of me.
 12 Q. Yes, I see.
 13 A. And —
 14 Q. That thought process that you've just described, "Well,
 15 hang on, if I take the test reports and don't query them
 16 then I'm effectively accepting them as accurate", is
 17 that a thought process you went through at the time or
 18 is that what you're thinking now, just so that I'm
 19 clear?
 20 A. I think I would have gone through it at the time.
 21 I knew of the testing, so I knew there were test reports
 22 out there and I knew that I could request them, but I'm
 23 sure that at that time I would have been questioning in
 24 my mind that if I do request them, what purpose am
 25 I requesting them for? Am I going to check them, in

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1 which case am I capable of doing that? Am I going to
 2 get them checked by somebody else? But, again, that
 3 wasn't part of the brief. If it had been, I think the
 4 initial conversation with LABC, we'd probably have drawn
 5 a line under it, we probably wouldn't have gone any
 6 further with it. So, yes, I probably did consider it at
 7 the time.
 8 Q. All right.
 9 Did you wonder — and you may not have done — why
 10 the Kingspan representatives didn't offer any of the
 11 underlying test reports to you?
 12 A. I don't remember. I don't remember thinking it odd at
 13 the time, but I can't recall, I'm sorry.
 14 Q. No.
 15 Are you able to say if Andrew Pack and Philip Heath
 16 had turned up at the meeting with not just the marketing
 17 literature and the BBA certificate but a number of test
 18 reports which are cited within the BBA certificate,
 19 would you have taken them, or would you have said,
 20 "Actually, thanks very much, but that's outside my
 21 remit, I don't want to see those"?
 22 A. I would have taken them if they were part of the package
 23 being handed over, but I think I would have taken them
 24 on the understanding that checking reports is not part
 25 of the remit of this assessment.

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1 Q. I see.
 2 Can we go back to page 20, please, of your first
 3 witness statement {HBC00000029/20}, and to the first
 4 paragraph, please. If I just read that with you:
 5 "Referring back to part of my answer to questions 9
 6 and 29, I believed from their responses [Mr Pack and
 7 Mr Heath] to my questions in the initial meeting that it
 8 was very much a marketing aim to have the LABC brand
 9 associated with their product. Furthermore, they wanted
 10 the opportunity to further emphasise the suitability of
 11 K15 in buildings over 18m, again for marketing purposes.
 12 This latter point seemed to me to be significant to
 13 Kingspan, who wanted to capitalize on the testing which
 14 had been carried out and the very recent issue of BBA
 15 certificate 08/4582 ... which incorporated details of
 16 those tests."
 17 Again, I appreciate that it is difficult, but are
 18 you able to assist us with how or in what way the issue
 19 of the suitability for use of K15 over 18 metres seemed
 20 to be significant to Kingspan during the meeting?
 21 A. It was clearly a market that not all insulation products
 22 could enter, so there was a clear business advantage to
 23 them in having a product that could be marketed in that
 24 context.
 25 Q. Forgive me, just stopping you there for a moment, did

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1 they say that or is that something you already knew?
2 A. I don't think I already knew that, no. No, before that
3 meeting I don't think I knew the significance of the
4 18-metre issue. I think that was something that was
5 conveyed to me in that meeting.
6 Q. I see, thank you. And I'm sorry, I stopped you,
7 actually. Go on, please. You were talking about how it
8 came to you to seem to be significant to Kingspan.
9 A. Well, yes, it's a particular area of business, an area
10 of sales for them. They had, to my understanding, got
11 the tests in place, but the icing on the cake for them,
12 I suppose, was that they'd got a BBA certificate now
13 from October of that year that actually ratified what
14 they were doing and how they were marketing the product,
15 and then the LABC endorsement was going to be just
16 another factor in that for them.
17 Q. Yes.
18 Can you remember exactly what either Mr Pack or
19 Mr Heath said to you about the use of the product over
20 18 metres in terms of compliance with
21 Building Regulations?
22 A. I can't remember the detail, but the key part was BR 135
23 and the way in which this product had performed in
24 fire tests.
25 Q. Mr Jones, were you told that more than one fire test

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1 relevant to BR 135 had been carried out successfully?
2 A. I don't believe so, no.
3 Q. Because you referred just then, I think, to "fire tests"
4 in the plural. Yes. Sorry, go ahead.
5 A. Yes, there were other tests referred to in the
6 BBA certificate, so that's why I used the plural.
7 Q. Yes, I understand.
8 Did you understand — and we are going to come on to
9 it — any of the tests listed in the BBA certificate
10 which are not BR 135 or BS 8414 to be relevant to the
11 use of the product over 18 metres?
12 A. No, no, they were background information more than
13 specific.
14 Q. I see.
15 Were you told in terms during the course of that
16 meeting by either Mr Heath or Mr Pack or both that K15
17 as a product was suitable for use over 18 metres?
18 A. I believe I was, yes, and I believe that mirrored the
19 sentence in the BBA certificate which referred to the
20 product having been — having reached the standards for
21 BR 135.
22 Q. And you remember that to be the explanation, do you,
23 that it was suitable for use over 18 metres because it,
24 K15, the product, has met the standards in BR 135?
25 A. Yes, it was the product that was being talked about,

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1 because of course the system was undefined. So, yes,
2 there was emphasis on the characteristics of the product
3 and how those lent it to being suitable for use over
4 18 metres.
5 Q. Yes, I see.
6 Would you have known, going into the meeting, so
7 before it, what testing needs to be carried out to show
8 that a product like K15 — let me put that differently.
9 Well, no, would you have known, going into the meeting,
10 what testing should have been carried out for K15 to be
11 suitable for use over 18 metres?
12 A. I think that depends at what stage I properly read the
13 BBA certificate, and I'm not sure, as I've said, whether
14 that was before or after the meeting, but that — the
15 description of the test there made the link between
16 BS 8414 and BR 135, so that would have been the extent
17 of my knowledge.
18 Q. Yes, I see, and so it may have been before or just
19 afterwards, but you did come to understand that BS 8414
20 in particular was a relevant test series for the use of
21 this product over 18 metres?
22 A. Yes.
23 Q. All right.
24 How many tests to BS 8414 did you understand, during
25 the meeting, that Kingspan had carried out successfully

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1 on any system incorporating K15?
2 A. I'm not sure if the number of tests had been discussed,
3 but I think perhaps I would have assumed it was one, it
4 was the one that was described in the BBA certificate.
5 Q. You think you might have assumed it was one?
6 A. Yes, because the BBA certificate talked of a specific
7 test, it didn't —
8 Q. Yes, it did.
9 A. Yeah.
10 Q. Did you ask at any stage during the meeting how many
11 tests to BS 8414 had been carried out on systems
12 incorporating K15?
13 A. I don't remember, sorry.
14 Q. Do you remember either Andrew Pack or Philip Heath
15 specifically mentioning that only one test to BS 8414
16 had been successfully carried out on a system
17 incorporating K15?
18 A. I don't specifically remember that, no.
19 Q. No.
20 Do you remember either of those individuals telling
21 you that K15 was only suitable for use over 18 metres in
22 one specific tested configuration?
23 A. No, that was definitely not the case. I mean, from very
24 early on in that meeting, one of the first principles
25 that came across was that K15 could be used in different

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1 configurations within the parameters of the testing that
 2 had been carried out.
 3 Q. Who told you that, Mr Jones?
 4 A. I can't recall whether it was Andrew or Philip, but I've
 5 said previously that the meeting to my memory closely
 6 mirrored what was in the Kingspan technical literature,
 7 which I know talks of different types of assembly
 8 without any caveats to say, you know, this is only --
 9 you know, the 18-metre criteria, there was nothing to
 10 indicate that only certain criteria fitted that.
 11 Q. Yes, so that's the content of the edition of the
 12 marketing literature which we're going to come on to
 13 look at. In terms of what was actually said to you at
 14 the meeting, is it your evidence that, whatever
 15 particular words were used, you were given to understand
 16 that K15 as a product could be used over 18 metres
 17 without qualification? Is that what you're saying?
 18 A. Within the parameters of the testing that had been
 19 carried out, which I believe to be reflected in the
 20 BBA certificate and the literature. So the impression
 21 I was given there is that the test that had been carried
 22 out set parameters in which K15 could be safely used and
 23 expected to perform as it had done in the tests, and
 24 I think the general principle, as I recall the
 25 impression I came away from that meeting with, was that

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1 you could use different products as part of the system
 2 as long as the fire performance of those products was
 3 equal to or better than the parameters set by the
 4 testing.
 5 Q. Yes.
 6 A. It was --
 7 Q. Sorry, I spoke over you, please do go ahead.
 8 A. Sorry, I think I'd finished.
 9 Q. All right.
 10 So just going back to that answer, you said:
 11 "... I recall the impression I came away from that
 12 meeting with, was that you could use different products
 13 as part of the system as long as the fire performance of
 14 those products was equal to or better than the
 15 parameters set by the testing."
 16 Yes?
 17 A. Yes, that was the impression I had.
 18 Q. First of all, I mean, it's very difficult for you to
 19 recall, I understand, but is that what was actually
 20 said? Did either Mr Heath or Mr Pack say that to you?
 21 A. I believe by the -- I had such a strong impression of
 22 that coming away from the meeting, my feeling is that
 23 they must have done, and that in turn is consistent with
 24 what was in the Kingspan literature. So whilst I'm
 25 working from memory of what was said 12 years ago,

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1 something gave me that impression in that meeting.
 2 I came away thinking that was the case.
 3 Q. Yes, and what were the parameters set by the testing
 4 which you've referred to, as you understood? What were
 5 those parameters?
 6 A. The non-combustible substrate referred to in the
 7 BBA certificate, and a system of cavity barriers,
 8 and ... it was what was described in the BBA certificate
 9 to me, and a non-combustible cladding panel.
 10 Q. Yes, I see.
 11 Can we go, please, to the transcript, and this is
 12 again to the evidence of Andrew Pack, and this is at
 13 {Day86/130:21}, please. So the question he was asked
 14 there is:
 15 "Question: Did either you or Philip Heath, as far
 16 as you can recall, tell David Jones that K15, in
 17 December 2008, when you met him, was suitable for use
 18 over 18 metres only in one specific configuration?
 19 "Answer: I cannot recall the words we actually
 20 used, but I would have emphasised that it was based upon
 21 a non-combustible substrate and a non-combustible
 22 cladding."
 23 That's actually over on to the next page.
 24 Does that accord with your recollection? Is that
 25 what you were told?

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1 A. I think that's the impression I had, yes. It mirrored
 2 what was being described in the BBA certificate, the
 3 non-combustible substrate and a non-combustible cladding
 4 board, which was a fairly generic type in that test
 5 description.
 6 Q. As far as you can recall, Mr Jones, did either
 7 Philip Heath or Andrew Pack tell you that the only
 8 successful test to BS 8414 on a system incorporating K15
 9 had been carried out using old technology K15 which, by
 10 December 2008, was no longer being produced or sold?
 11 A. No, certainly not, because every part of my judgement
 12 thereafter would have been null and void with that
 13 information.
 14 Q. Did either Philip Heath or Andrew Pack tell you that the
 15 version of K15 then being sold in late 2008 and going
 16 into 2009, the new technology K15, had been incorporated
 17 into four systems tested to BS 8414-2, all of which had
 18 been unsuccessful?
 19 A. No. No, they didn't.
 20 Q. Would that too have affected the assessment you went on
 21 to carry out?
 22 A. Absolutely, it would have been a different product. Any
 23 assumptions made on previous testing would have been
 24 irrelevant.
 25 Q. Yes.

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1 Did either Philip Heath or Andrew Pack explain to
 2 you that the one successful test to BS 8414 carried out
 3 on a system incorporating K15 was on a masonry backed
 4 system, so to part 1, and was therefore not relevant to
 5 steel-framed systems?
 6 A. No, they didn't, no.
 7 Q. When Mr Pack was asked about this — if we can go back
 8 to his evidence, please, at {Day86/149:15}, please —
 9 I've asked him there:
 10 "Question: Did you tell David Jones at that meeting
 11 or at any other time that the system tested in May 2005
 12 was a masonry-backed system, not a steel-framed system?
 13 "Answer: Yes, it would have been based upon
 14 a masonry background, yes.
 15 "Question: You told him that?
 16 "Answer: Yes. However, the literature we had,
 17 I believe, showed masonry and steel frame with
 18 a non-combustible backing and I believe it was from that
 19 that the LABC was wrote."
 20 Do you remember Mr Pack telling you that?
 21 A. No. No, I don't. My understanding was clear that it
 22 was a non-combustible substrate, that that was the test
 23 condition.
 24 Q. All right.
 25 Mr Jones, did you tell Andrew Pack or Philip Heath

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1 at any stage, either during the meeting or at any stage
 2 thereafter, about your own levels of expertise and
 3 experience as you have described them to us?
 4 A. I don't suppose I would have been as explicit as that in
 5 giving them my background, it wouldn't have been
 6 appropriate in that meeting, but I believe that, as the
 7 meeting progressed, the questions I was asking and the
 8 nature of the things I was saying would have been — it
 9 would have been obvious to somebody who worked in this
 10 field what my level of experience was.
 11 Q. All right, thank you.
 12 Just so that I'm very clear, your level of
 13 experience that you say would have been obvious during
 14 the meeting due to your questions, are you talking
 15 there — well, which of the following three things are
 16 you talking about: are you talking about the K15
 17 product, that type of insulation, or use of such
 18 products over 18 metres, or are you talking about your
 19 level of experience in terms of the type approval
 20 process, or a mixture of those?
 21 A. I think probably a mixture of them. I mean, the type
 22 approval process was new to me, but I had at least had
 23 a briefing from LABC on how that worked, so I could talk
 24 about the type approval process with some competence.
 25 But in terms of my knowledge of K15, of buildings over

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1 18 metres, and of testing and certification generally,
 2 I think it would have been apparent, you know, from, as
 3 I say, the sort of questions I was asking and the
 4 statements I was making that — I wouldn't have been
 5 trying to hide, you know, my lack of knowledge. The
 6 whole point of this meeting was to elicit this knowledge
 7 from Kingspan, to find out from them what I needed to
 8 know.
 9 Q. No. I mean, would it be fair for me to say that you
 10 would have no reason, would you, to hide your lack of
 11 knowledge about K15 or its particular uses?
 12 A. No, no, this was supposed to be a relatively
 13 collaborative exercise between Herefordshire Council,
 14 Kingspan and LABC, all bringing to the table their own
 15 particular expertise to come up with a usable document.
 16 Q. Can we go back to your first witness statement again,
 17 please, and to page 37 {HBC00000029/37}. If you look,
 18 please, about two-thirds of the way down the page at
 19 question 61, you have been asked there:
 20 "As far as you are aware, did any employee or
 21 ex-employee of Kingspan, at any stage, state that K15
 22 was a material of limited combustibility, whether
 23 verbally or in writing?"
 24 That's the question, and you're asked to give
 25 details. Your answer:

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1 "If this happened it would have been in my initial
 2 meeting with Kingspan at the start of the Herefordshire
 3 Council assessment. However I cannot from memory recall
 4 exact wording, or who said what, and so on that basis it
 5 would be wrong of me to say that anybody used the
 6 specific phrase 'limited combustibility.' I can say
 7 with some certainty however that I left that meeting
 8 with the clear impression that this is what K15 was."
 9 Yes?
 10 A. Yes.
 11 Q. Can you recall specifically what it was during that
 12 meeting that gave you the impression that K15 was
 13 a material of limited combustibility?
 14 A. I think, whilst I can't talk about specific wording
 15 as — you know, after all this time, this very clear
 16 impression I had, and I believe this was how it was
 17 presented to me, was that K15 has been put in these test
 18 conditions, large-scale test rigs, in a situation where
 19 only a limited combustibility material would do, and
 20 it's passed, it's behaved — in those conditions, in
 21 these test rigs, it had behaved as you would expect and
 22 hope a material of limited combustibility would. That
 23 was the impression I had after that meeting. It was the
 24 testing had proved the characteristics of this product
 25 when subjected to a fire.

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1 Q. Yes. Were those large—scale test rigs described to you
2 by Andrew Pack and/or Philip Heath?
3 A. No.
4 Q. All right.
5 Did either Philip Heath or Andrew Pack tell you in
6 terms that K15 was a material of limited combustibility?
7 A. I can't say that they did. I think it's ... there's the
8 specific term "limited combustibility", which has
9 a meaning in itself, and there are lots of other words
10 that can describe a material that has a limited capacity
11 to burn, and I think — perhaps it's difficult sometimes
12 to draw the line between one and the other, or it was
13 for me at that time anyway.
14 Q. Yes. Did either of them use some words to the effect
15 that K15 had a limited capacity to burn?
16 A. I can't remember words, but again, I remember it being
17 the distinct impression that I had, so I believe that
18 somehow in that discussion, words must have been used to
19 give me this very distinct impression that you could
20 subject this product to fire and it would not ... I'm
21 not going to say it would not burn, because we know that
22 these products burn, but it would not burn — it would
23 burn in a very limited way.
24 Q. I see.
25 Did either Philip Heath or Andrew Pack tell you that

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1 the test which had been carried out to BS 8414 somehow
2 meant that K15 could be considered to be a product of
3 limited combustibility?
4 A. I couldn't say they used those specific words, but
5 I think that that was the ... that was a principle that
6 came out, that it's behaved as you would want a material
7 of limited combustibility to behave in these
8 circumstances, therefore it — you know, that — and
9 these were my words later, of course, but it can be
10 considered a material of limited combustibility by
11 virtue of the way it's performed when subjected to fire.
12 Q. Yes, I see. I understand that those were your words
13 later, and certainly we'll come to those, and I do
14 appreciate that it's your evidence that you can't
15 in fact recall specific words. But just going back to
16 that last answer, you said, "That was a principle that
17 came out, that it's behaved as you would want a material
18 of limited combustibility to behave in these
19 circumstances, therefore it", and then you stopped, and
20 went on to something else.
21 Is this your evidence: the principle that came out,
22 whatever the words that were used, was that because it
23 had behaved like a material of limited combustibility,
24 it could be considered to be one?
25 A. Yes. That was how I interpreted what was being said.

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1 Q. I want to take you to the evidence of both Philip Heath
2 and Andrew Pack on this particular issue. If we can
3 take them in turn.
4 If we go to Philip Heath first, please, at
5 {Day79/178:25}, so it's the last line there:
6 "Question: Did you ever tell Mr Jones during that
7 meeting that K15 was a material of limited
8 combustibility?
9 "Answer: Absolutely not.
10 "Question: Did you ever tell him that the test to
11 BS 8414 in 2005 meant that it could be considered to be
12 a material of limited combustibility?
13 "Answer: No, I wouldn't have said that, no.
14 "Question: Did you ever give Mr Jones the
15 impression that K15 was suitable for use over 18 metres
16 without qualification?
17 "Answer: No, I didn't."
18 Mr Jones, is that evidence true, as far as you can
19 recollect?
20 A. In terms of them telling me directly that K15 was
21 a material of limited combustibility, as far as the
22 actual wording goes, I think his evidence could be
23 correct, that he didn't say that directly in the way
24 it's worded there. In terms of the question in
25 line 7 —

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1 Q. Yes.
2 A. — I think I was given the impression that K15 was
3 suitable for use over 18 metres, perhaps not without
4 qualification, because we still had the parameters set
5 by the testing —
6 Q. Yes.
7 A. — but the parameters set by the testing were given to
8 be quite broad in terms of non—combustible substrate,
9 non—combustible cladding panel, and the requisite
10 cavity barriers and the like in between.
11 Q. Yes. Anything non—combustible and some cavity barriers,
12 basically?
13 A. That was it, yes, yeah.
14 Q. All right.
15 Turning to Mr Pack's evidence on this, please, at
16 {Day86/148:15}, can you see that he says there — so
17 these are Mr Pack's words at "A", answer:
18 "Answer: But I absolutely disagree with the comment
19 that he left that meeting under the understanding that
20 our product was limited combustibility.
21 "Question: I'm not sure you can disagree with his
22 recollection that he left the meeting with that
23 impression; I think what you're trying to say is that
24 you didn't give that impression, are you?
25 "Answer: Absolutely.

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1 "Question: Did either you or Mr Heath say that K15
2 was a material of limited combustibility?
3 "Answer: I can only comment on myself, and I did
4 not say the product was limited combustibility or infer
5 that it was of limited combustibility.
6 "Question: You didn't say it or infer it?
7 "Answer: Yes."
8 Again, is that right? What do you say about that?
9 A. I believe there must have been some form of inference.
10 I came away with that impression of the product, and
11 I must have got that from somewhere.
12 Q. Yes.
13 Going back, please, to your first witness statement
14 now at page 38 {HBC00000029/38}, and to the first
15 paragraph. At the top there, do you see the sentence
16 beginning, "I recall thinking"?
17 A. Yes.
18 Q. So this is just after you have explained that you left
19 the meeting with a clear impression that K15 was of
20 limited combustibility. You go on to say there:
21 "I recall thinking that this was consistent with
22 a general opinion among building control surveyors I had
23 known that Kingspan products would not really burn but
24 would char slowly and self-extinguish once the ignition
25 source was removed."

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1 Yes?
2 A. Yes.
3 Q. Do you mean there, just for clarity, that you recall
4 thinking that after the meeting with Kingspan?
5 A. Yes, it's something that stuck in my mind, that I came
6 away from that meeting with the impression that this
7 product had behaved as a material of limited
8 combustibility would be expected to, and then thinking:
9 actually, yes, that's what people have always said about
10 it, in that I can recall a marketing video which
11 I believe was from Kingspan at that time which I'd seen,
12 and I'm sure many of my peers had seen, which showed
13 a piece of Kingspan board being subjected to
14 a blowtorch, and it shows how it doesn't actually catch
15 light, it turns black, it glows red around the edges,
16 the blowtorch is turned off and the flame peters out.
17 So there was definitely an impression in the
18 industry that that was how these products behaved in
19 fire, so what I was being told didn't seem so outlandish
20 with that in mind.
21 Q. Yes.
22 That general opinion or that awareness that you had
23 of that view of how Kingspan products would perform in
24 fire, am I correct in understanding that you were not
25 talking there in your witness statement about K15 only,

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1 that was your impression of Kingspan products in
2 general, their insulation boards?
3 A. Yeah, this generic form of product, yes.
4 Q. I see.
5 This memory you had or this awareness that you had,
6 and the general opinion among building control surveyors
7 that Kingspan products would not really burn but would
8 char slowly and then self-extinguish once the source of
9 flame was removed, did you understand that to mean the
10 same as being of limited combustibility?
11 A. I don't think I made that direct comparison. I mean,
12 I think what I would say is that now, at this stage,
13 I understand that a very great significance attached to
14 the two words "limited combustibility", and I mentioned
15 earlier that actually, is there a difference between
16 a material of limited combustibility and a material
17 which has a limited capacity to burn? They can be two
18 different things. I don't think in 2008 and 2009
19 I would have quite understood the distinction between
20 those two things.
21 Q. Yes. Do you see a distinction between them now?
22 A. Yes, from the analysis post—Grenfell, yes. I mean,
23 I don't think there can be many industry professionals
24 who don't see the words "limited combustibility" and
25 hear alarm bells. But I don't believe that was the case

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1 in 2008. I don't think it was as well understood.
2 Q. I see.
3 Could you tell me, when did the words "limited
4 combustibility" come to mean something different to you
5 than they had done in late 2008, early 2009?
6 A. I think the significance of it has been in the last year
7 or so, nearly year and a half, when I was first asked to
8 start answering questions.
9 Q. By this Inquiry?
10 A. By this Inquiry. I mean, bearing in mind that I haven't
11 worked in the building control profession since early in
12 2014, so I haven't — you know, it hasn't been something
13 that I would have considered since then.
14 Q. Yes. Thank you.
15 Going back to your first witness statement again
16 now, please, and to page 28 {HBC00000029/28}.
17 At the first paragraph there, you say:
18 "There is no doubt that my wording in the Type
19 Approval Summary would have been influenced by things
20 that were said by Kingspan representatives at the
21 initial meeting, and by things that were written or
22 shown in the Kingspan technical literature."
23 Is that right?
24 A. I believe it would be. I believe that first meeting
25 set — sort of set the scene, if you like. It set the

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1 initial principles and in some ways the direction that
 2 I took it from there.
 3 Q. Yes.
 4 Could we just scroll down that page, please. There
 5 is another section that I'm looking for and that is not
 6 currently available to my brain.
 7 No, we'll come back to that.
 8 All right, I want to show you some email
 9 correspondence. If we can go to {KIN00024989}, please.
 10 Thank you.
 11 If we can go down, please, to the third email down
 12 in the chain, this is your email to Andrew Pack sent on
 13 26 January 2009 at 14.46. Yes?
 14 A. Yes.
 15 Q. You say there — I'm just going to go to the second
 16 paragraph, so the larger paragraph:
 17 "I have now done the research necessary and come up
 18 with what I think will be a [usable] certificate for
 19 acceptance by LABC across the UK. What I have tried to
 20 do as we discussed is to get away from just assessing
 21 K15 as a product in isolation and extend the certificate
 22 to represent a system approval for the whole external
 23 wall arrangement. Of course, with the other components
 24 being undefined, and with various options available this
 25 does present some problems as we established when we

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1 met. What I have done though is to refer to the three
 2 standard details contained within the Kingspan
 3 literature (unless you have any other standard detail
 4 drawings that you think may be more appropriate?) and
 5 instead of applying a manufacturers reference to the
 6 undefined elements I have specified a generic standard
 7 for each (using British Standard references). The
 8 conclusion being that K15 can be accepted in all
 9 locations provided the other parts of the wall
 10 construction meet the standards stated and reflect the
 11 Kingspan standard details. Inevitably most mainstream
 12 products will have been manufactured to the appropriate
 13 British Standard and so the 'system' in each case should
 14 be fairly easy to pin down, and the contribution of K15
 15 to the relevant parts of the regulations obvious."
 16 That's quite a long passage to read, but just
 17 looking at the second line of that paragraph, about
 18 halfway across, where you say:
 19 "What I have tried to do as we discussed ..."
 20 Is this something that you had discussed with
 21 Andrew Pack at your meeting in December 2008? By that
 22 I mean the idea of extending the certificate to
 23 represent a system approval for the whole external wall
 24 arrangement rather than a product approval for K15.
 25 A. Yes, I believe this is probably the first contact I had

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1 with Andrew since the meeting in December, and I believe
 2 it's a sort of continuation of the discussion we had in
 3 that meeting about how — you know, and this goes right
 4 back to the question I had at the start: how do I do
 5 a system approval when I only have one part of that
 6 system? And how that question developed into
 7 a discussion in that meeting that eventually led to this
 8 email.
 9 You know, I think if we go back to the original
 10 email chain from LABC, we see we, as
 11 Herefordshire Council, were being asked to do a system
 12 approval, not a product approval, and I had wrangled
 13 again and again with: how can I do this?
 14 But I think the meeting with Kingspan covered this
 15 in quite some detail as to how we can make it a useful
 16 certificate. Because a certificate just for the
 17 product, just for an insulation product, was going to be
 18 of no value to Kingspan. It didn't say anything, just
 19 sort of: this is a slab of insulation. So it was clear
 20 that they wanted something more, they wanted it to be
 21 something that could be representative of a system,
 22 albeit that that system hadn't been defined, and this
 23 email is — you know, I have gone away from the meeting
 24 and I have racked my brains to see: how could we define
 25 a system while still staying within the parameters of

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1 what's been tested and what this product can be used
 2 for?
 3 Q. Yes.
 4 In terms of this issue being discussed at the
 5 meeting, and you've just said that it was discussed in
 6 quite some detail because I think it's fair to say it
 7 was quite an obvious problem with this whole process,
 8 was it?
 9 A. Yes, to me it was — as I say, I wrangled over it a lot:
 10 how on earth can I do this?
 11 Q. Who was it who raised it at the meeting? Was it you or
 12 was it one of Mr Heath or Mr Pack?
 13 A. The problem of — I believe it would have been me,
 14 because I think it was one of my questions that I went
 15 to that meeting armed with.
 16 Q. Can you remember what either Andrew Pack or Philip Heath
 17 said about it? You said a few moments ago, I think,
 18 that it was clear that they wanted something that could
 19 be representative of a system. Is that what one or both
 20 of them said to you?
 21 A. Yes, that's — again, I can't remember the wording, but
 22 that was discussed, yes.
 23 Q. All right.
 24 Can we go back again, please, to Andrew Pack's
 25 evidence, and this is at {Day86/152:19}. Mr Pack is

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1 being asked there about the email you and I have just
 2 looked at, where you said "As we discussed at our
 3 meeting" and what you say in the email about system
 4 approvals, and extending the certificate. All right?
 5 Mr Pack says:
 6 "Answer: No, that wasn't — it wasn't Kingspan that
 7 came up with that idea. We talked to him about — we
 8 talked to Herefordshire Council about the product. He
 9 went away, discussed with LABC, and came back, and his
 10 conclusion was that we should treat it as a system
 11 approval.
 12 "Question: Well, no, but hang on, what he says here
 13 is [this is a reference back to the email], if you look
 14 at the second line of that larger paragraph:
 15 "'What I have tried to do as we discussed is to get
 16 away from just assessing K15 as a product ...'
 17 "Answer: Yes.
 18 "Question: So that must have been discussed at the
 19 meeting. He didn't come away from the meeting, come up
 20 with the idea that he would extend the certificate into
 21 a system approval and then announce it to you here; he
 22 is saying to you here, isn't he, 'We discussed that idea
 23 at the meeting and here's how I'm going to go about it?'
 24 Do you see?"
 25 A. Yes.

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1 Q. Then Mr Pack says:
 2 "Answer: That's what I'm saying. So at the meeting
 3 we discussed just the product in isolation.
 4 "Question: Yes.
 5 "Answer: He then went away and said, 'Actually,
 6 I've now discussed it and I have another solution, which
 7 is to treat it as a system approval'.
 8 Then if we go down to line 18, please, Mr Pack says
 9 this:
 10 "Answer: So in the meeting we had, we were looking
 11 at the product. It was just the product in isolation,
 12 on its own, just like we did with the tapered
 13 insulation. It was talking about the insulation.
 14 Obviously he has now gone away and said, 'Actually, I've
 15 now come up with a proposal, and the proposal is that we
 16 look at it as a system approval'.
 17 I realise I have read quite a lot there, but is he
 18 right about that? Is that what happened, you went away
 19 afterwards and came up with this idea?
 20 A. No, I don't agree with that account of events. I can
 21 distinctly remember from the meeting that any suggestion
 22 that it was just going to be a product approval was of
 23 limited value, even to the extent that I feel that if
 24 I had said that, I don't think it would have gone any
 25 further. You know, obviously they hadn't at that stage

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1 paid LABC any money. But I think if it had just been
 2 a certificate of a slab of insulation, it was of no
 3 value to them and they wouldn't have gone any further
 4 with it.
 5 So that email we were looking at a moment ago from
 6 me clearly contained some proposals from me about how we
 7 might move it forward, but they were proposals designed
 8 to meet the needs that Kingspan had expressed in that
 9 meeting. It was — it began with their requirements.
 10 Q. Yes. Shall we go back to that email? That might assist
 11 you. It's {KIN00024989}, please. So at the fourth line
 12 down, you say:
 13 "Of course, with the other components being
 14 undefined, and with various options available this does
 15 present some problems as we established when we met."
 16 I mean, having been taken to Mr Pack's evidence, and
 17 you have very helpfully said that you don't agree with
 18 that account of events, can you help us to: what were
 19 the problems you established when you met, as you refer
 20 to in the fifth line of that paragraph of that email?
 21 What were those?
 22 A. Well, it was about how to define a system that would
 23 stay within the parameters that we needed them to stay
 24 within for the testing that had been carried out. If we
 25 didn't specify any products as part of that system, then

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1 that left it open to just use about anything, which
 2 wouldn't have stayed within the parameters of the test.
 3 So that was the problem: how do we define these products
 4 in a way that limits the system to the parameters needed
 5 without actually knowing what those products are?
 6 Q. Yes.
 7 You then go on to set out how you propose to get
 8 around the problems that you had discussed, which you've
 9 just described. Can I take it that you considered at
 10 the time that the proposal you set out there was
 11 accurate and correct?
 12 A. Yes, I believed it to be. I believed that what I was
 13 trying to define there was within the parameters of the
 14 testing that we'd discussed.
 15 Q. Within the parameters of the testing as those had been
 16 described to you by Kingspan?
 17 A. Yes, yes. This email is a continuation of the
 18 discussion in that meeting.
 19 Q. Yes.
 20 SIR MARTIN MOORE-BICK: I'm sorry, can I just ask for your
 21 help on something, Mr Jones.
 22 You were obviously very concerned that you were
 23 being asked to produce a certificate for a system when
 24 the test had only been — or the appropriate certificate
 25 would be for a product.

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1 Why did you feel it necessary to go to such lengths
2 to satisfy Kingspan's requirements?
3 A. I perhaps ask myself the same question now, but it's
4 because that's what LABC had asked us to do. They'd
5 asked us to do a system approval. They'd asked us to go
6 and meet Kingspan and find out what Kingspan wanted. So
7 I suppose from every angle I was being pressured by LABC
8 and by Kingspan, if you like, to find a way of doing
9 a system approval, and I suppose I was just trying to
10 please all parties, but at the same time come up with
11 something coherent as far as I felt it was at the time.
12 SIR MARTIN MOORE-BICK: Yes, that's helpful, thank you very
13 much.
14 Yes, Ms Troup, sorry.
15 MS TROUP: Thank you, no.
16 Could we go back to your first witness statement,
17 please, at page 41 {HBC00000029/41}. Do you see the
18 third paragraph, which is quite a big paragraph? If you
19 could go four lines up from the bottom of that
20 paragraph, beginning "In terms of merit". Do you see
21 that?
22 A. Yes.
23 Q. I just want to read that with you. You say there:
24 "In terms of merit, I believe it would be true to
25 say that information released by a company like

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1 Kingspan, a world leader in insulation products with an
2 extensive budget for research and development and
3 a reputation for integrity, would have been viewed not
4 with unconditional acceptance, but with a degree of
5 trust."
6 Now, I think in fact you're talking there in
7 particular about the technical or marketing literature
8 that is released by Kingspan.
9 Would it be true to say, or would it be fair to say,
10 that the same thinking would apply on your part to
11 information you were given by Kingspan representatives
12 at a meeting?
13 A. Absolutely, yes.
14 Q. From where had you learned of what you describe there as
15 Kingspan's reputation for integrity?
16 A. I just — I'd worked in the construction industry all of
17 my career up to that point, not always in
18 building control of course, but Kingspan are one of the
19 most prominent material manufacturers in the UK,
20 I believe, and so we all knew a lot about the company.
21 Now, maybe my, you know, impression of them as a company
22 of integrity was misplaced, but it was how I felt at the
23 time. They were an industry leader, they were driving
24 certain parts of the — of industry agenda, of
25 regulatory agenda. The whole industry turned to them

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1 for advice on part L compliance and insulation products
2 at a time, of course, when part L was at the top of the
3 regulatory agenda. So I think we all knew Kingspan, we
4 all knew of them.
5 Q. Yes.
6 You said there that the whole industry turned to
7 them for advice on part L. As far as you were aware at
8 the time — so we're talking again about early 2009 —
9 were Kingspan consulted by industry, by other
10 organisations or individuals in industry, on other
11 aspects other than part L?
12 A. Yes, I believe they would have been, it's the
13 suitability of their products, and of course in the case
14 of K15 it isn't just the part L compliance, it's also
15 the part B compliance and any other relevant
16 Building Regulations requirements. So, yes, they were
17 providing this advice service to the industry.
18 Q. Yes.
19 As far as you were aware, in 2009 or late 2008, your
20 impression of Kingspan or your understanding of
21 a reputation for integrity, was that shared by your
22 colleagues, do you think?
23 A. Yes, I would say it was.
24 Q. Yes.
25 All right, Mr Jones, we're going to move on to talk

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1 about your understanding, at the time you were carrying
2 out the research to produce the 2009 certificate, of
3 certain key terms.
4 So I will ask, please, that we go to your first
5 witness statement at page 29 {HBC00000029/29}. You have
6 been asked here by the Inquiry above about your
7 understanding in May 2009 — that's at the top of the
8 page — of a series of different words or phrases.
9 I just want to take you through those.
10 If we look at (a), you have been asked about the
11 meaning of "limited combustibility", and you say there:
12 "I would have understood limited combustibility in
13 quite a literal sense to mean a material that had the
14 capacity to burn, so could not be considered
15 non-combustible, but would ignite with some difficulty
16 and would not allow flame to spread easily through it."
17 Yes?
18 A. Yes.
19 Q. Where had that understanding come from?
20 A. I think it was just, perhaps, a literal interpretation
21 of the words "limited combustibility", and perhaps links
22 to an earlier question where, as I said, it is about
23 making this distinction between limited combustibility
24 and materials that have a limited capacity to burn,
25 which I think at that time I don't believe I had, and

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1 I don't believe I was unusual in that.
 2 So I think it is quite a literal interpretation, and
 3 I don't think there was a wide understanding of what
 4 limited combustibility was in the industry then, in my
 5 experience.
 6 Q. So is your understanding of the meaning of that phrase,
 7 "limited combustibility", different now?
 8 A. Yes, yes. I mean, I was aware in 2008 that there was
 9 a table in the back of Approved Document B that gave
 10 a criteria for limited combustibility, so I knew that
 11 much, but I still would have viewed it as: well, there
 12 may be other ways of defining a material as of limited
 13 capacity to burn, as it was always drummed into us as
 14 building control officers, that the approved document is
 15 one way of achieving something, but you should always be
 16 open to looking at other evidence to see if the
 17 functional requirement is met.
 18 So the functional requirement, in my mind, for
 19 limited combustibility would be something that had this
 20 limited capacity to burn.
 21 Q. Yes, I see. So you were aware at the time that there
 22 was a table defining the term within Approved
 23 Document B, were you?
 24 A. Yes, it would have been — that table was referred to in
 25 section 12, so, you know, I would have been aware of

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1 that, yes.
 2 Q. Yes. But is this right: you decided that there might be
 3 other ways to view it or of defining a material as
 4 having a limited capacity to burn?
 5 A. Yes, about looking at a functional requirement, and, as
 6 I say, this was something that really was drummed into
 7 us as building control surveyors. We all knew that the
 8 approved documents could be very limited in terms of —
 9 well, they could be very confusing, they could be open
 10 to interpretation, they were always behind the times in
 11 terms of industry development. So it was a requirement
 12 of the job that you would be prepared to look at and
 13 properly consider alternative approaches that seemed to
 14 meet the same functional requirement.
 15 Q. Yes, I think I understand all that.
 16 Just so that I'm clear, you say that you were aware
 17 of the table in Approved Document B defining "limited
 18 combustibility" and giving that phrase its particular
 19 meaning in this context; before deciding on the basis of
 20 all the things about the approved documents which you
 21 have just mentioned, before deciding that it would be
 22 good to look at alternatives and other ways to define
 23 it, would it not be sensible to actually check the
 24 definition in that table in Approved Document B to see
 25 whether you needed to go outside of it in any way?

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1 A. I believe I would have done that —
 2 Q. I see.
 3 A. — in that it was referred to in section 7, which is
 4 where I would have started.
 5 Q. Yes, I see. All right, we'll come to that then,
 6 thank you.
 7 If we can go back to your witness statement, which
 8 I think should still be on the screen, and look at (b),
 9 this is about the meaning of national class 0,
 10 a classification to national class 0. You say there, if
 11 we look at (b) and onwards together, first:
 12 "I would have understood class 0 to be the highest
 13 possible national standard when judging the ability of
 14 a material to prevent fire from spreading across it."
 15 Then you say at (c):
 16 "I would not have had a particular understanding as
 17 to how class 0 was achieved, but would have known that
 18 there were tests which could demonstrate whether
 19 a material achieved class 0."
 20 Yes?
 21 A. Yes.
 22 Q. You then go on to say:
 23 "(d) I would have been aware that those properties
 24 which allowed some materials to be designated as class 0
 25 could be the same properties which allowed them to be

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1 classed as materials of limited combustibility and vice
 2 versa. However I would have known that a material being
 3 designated class 0 would not have automatically allowed
 4 it to be considered limited combustibility, even though
 5 that might often be the case."
 6 Yes?
 7 A. Yes.
 8 Q. Then at the last paragraph you say:
 9 "I can recall a great deal of confusion over this
 10 both in the wider construction industry and within the
 11 building control profession. I would say from my
 12 experience then that it was common to hear people say,
 13 even within building control circles, that if a material
 14 doesn't allow fire to spread across it then it must be
 15 of limited combustibility."
 16 Yes?
 17 A. Yes.
 18 Q. Given that you've identified — well, let me just check,
 19 actually: were you aware at the time of that confusion
 20 you describe in industry?
 21 A. Yes, I was aware of the confusion. It was something
 22 amongst building control officers we often had to
 23 correct in the wider industry, the difference between
 24 fire resistance and fire retardance and combustibility.
 25 It wasn't widely understood.

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1 Q. No, but those were matters which you as
2 a building control professional had to have a good
3 enough working knowledge of to be able to correct the
4 misunderstandings of others; is that right?
5 A. Yes, yes.
6 Q. Can I take it, then, that in 2009 there was absolutely
7 no confusion in your mind as to the difference between
8 and the relationship between a classification to
9 national class 0 and a material of limited
10 combustibility?
11 A. Yes, I knew that it was two separate things, that the
12 class 0 designation of K15 was a piece of background
13 information that, viewed alongside everything else,
14 might have pushed you towards a certain conclusion, but
15 I knew that that in itself didn't allow a material to be
16 called limited combustibility.
17 I mean, I think the only — and this is all from
18 memory of how I thought at the time — I think the only
19 possible confusion would be that ... I think there was
20 a — sometimes an understanding that if you have
21 a material that is a class 0, that the material making
22 up the surface layer of that material would be of
23 limited combustibility, because if it wasn't, fire would
24 spread readily across it. So a class 0 product might
25 have a limited combustibility surface, but what lies

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1 behind it is not.
2 I suppose the question comes then: what if you've
3 got a product that is a solid block of something like,
4 you know, a slab of insulation? If you make the
5 judgement that the surface of it has achieved class 0,
6 so the surface layer must be of limited combustibility,
7 but actually the middle of it is made of the same
8 material, could that be limited combustibility?
9 Again, I don't think I would have — you know, that
10 in itself wouldn't have been enough for me to say, "This
11 product is limited combustibility", there were other
12 factors, but it was just another piece of evidence,
13 you know, when I'm weighing up the facts to make
14 a judgement.
15 Q. Yes, all right, thank you.
16 If we can go back to page 30 of your witness
17 statement {HBC00000029/30}, please, and paragraph (e),
18 there you had been asked about the relevance, if any, of
19 a class 0 classification to an insulation board such as
20 K15, and you say:
21 "The only direct relevance I would see is in
22 relation to cavity barriers and table 13 of Approved
23 Document B, where the extent of sub-division is linked
24 to surface spread rating of surfaces within the cavity."
25 Yes? Do you see that?

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1 (Pause)
2 Mr Jones, I seem to have lost your sound?
3 A. Sorry, am I back now? Hello?
4 Q. Yes, I can hear you now. I'm so sorry, could you repeat
5 your last couple of sentences? I think you were
6 speaking but I couldn't hear you.
7 A. Sorry, yes, I was just agreeing that, yes, I can see
8 that.
9 Q. Yes, all right, thank you.
10 Is that something you were aware of in 2009 or
11 something you have become aware of at some stage since
12 then?
13 A. No, I think that was something I was aware of in 2009
14 because, once again, it's something that's referred to
15 in section 12.
16 Q. Yes. All right.
17 Let's go to page 31 {HBC00000029/31}, please, and to
18 paragraph (f). Here you're being asked about your
19 understanding as at May 2009 of the 8414 test series,
20 and you say:
21 "I would not have had any real knowledge of the
22 BS8414 test series, other than the fact that it set the
23 standard for testing external cladding systems and had
24 links with BR135. It had never come up in anything
25 I had dealt with up to that point."

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1 Yes?
2 A. Yes.
3 Q. Did you appreciate prior to the issue of the LABC
4 approval certificate in May 2009 that BS 8414 is
5 a system test rather than a product test?
6 A. I wouldn't have had a detailed understanding of that
7 test series, no.
8 Q. Well, fair enough, I appreciate that, but did you know
9 that?
10 A. Yes.
11 Q. Did you know that it was a system test?
12 A. Yes. Sorry, I think, yes, I knew by virtue of its links
13 with BR 135 that it was a test of a system, yes, yes.
14 I think what I meant to say was I wouldn't have
15 appreciated the very specific nature of the test, as in
16 a BS 8414 test is only valid for an exact replica of the
17 test that it's based on.
18 Q. You did not appreciate that at the time?
19 A. Not at the time, no.
20 Q. When did you come to appreciate that?
21 A. Only in preparing for the responses to the Inquiry, in
22 the last —
23 Q. I see. All right.
24 Back to page 31 {HBC00000029/31}, please, and to
25 paragraph (h). You say there in the first line:

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1 "I would not in 2009 have appreciated the difference
2 between parts 1 and 2 of BS 8414."
3 Is that right?
4 A. That's right.
5 Q. Was that the case both before and after your meeting
6 with Kingspan in December 2008?
7 A. Yes, I believe so, yes.
8 Q. Do you remember whether at any stage of your meeting
9 with Philip Heath and Andrew Pack the difference between
10 part 1 and part 2 of BS 8414 was touched on?
11 A. I don't believe it was, because I think it would have
12 prompted me to research it further.
13 Q. Yes.
14 Did you at any stage read BS 8414, either part 1 or
15 part 2, before the approval certificate for K15 was
16 issued?
17 A. No, I didn't.
18 Q. Given that I think you said that neither BS 8414 nor
19 BR 135 had come up in anything you had dealt with up to
20 that point, and you were aware that BR 135, as you put
21 it, I think, set the standard for external cladding
22 systems, were you not prompted by this piece of work and
23 what it encompassed to look up BS 8414 or BR 135?
24 A. I wasn't at the time, no. I believe I thought that the
25 sort of fairly definitive statements in the

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1 BBA certificate were enough to say I think this product
2 has met the classification necessary for BR 135, and
3 that was the information I took — went forward with.
4 Q. Yes, without even knowing what the classification
5 criteria in BR 135 were?
6 A. Yes. Having had no experience with those
7 British Standards, it just wasn't ... I think, when
8 using third-party guidance, in particular
9 British Standards, I was always taught that you have to
10 be careful not to pick and choose. If you're going to
11 use a British Standard, you either use it fully or you
12 don't use it at all. You can't just use bits of it and
13 pick and choose the bits you understand. So I think
14 perhaps I felt that, not having any knowledge of 8414 or
15 testing standards in general, I wasn't going to learn
16 about these test series in the scope of this exercise
17 that I was doing.
18 Q. I see.
19 Are you saying, essentially, that it was better to
20 proceed with no knowledge at all than to start trying to
21 learn about it at that stage?
22 A. It was just beyond the scope of what I'd been asked to
23 do by LABC, I think is the key to it. If, as
24 I described earlier, my brief had been to properly
25 analyse and vet the test results that were based on

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1 BS 8414, then I would have naturally needed to have
2 a proper understanding of 8414 in order to do that, to
3 see if the test conditions matched what was required by
4 the standard. But because all of this was outside of
5 the scope of the brief, it wasn't part of what I was
6 asked to do.
7 Q. Yes.
8 Mr Jones, are you able to say, if in your call with
9 the LABC that person had said to you, "Right, you're
10 going to need to understand BS 8414 parts 1 and 2, the
11 criteria in BR 135, and the circumstances in which
12 Kingspan's particular test was carried out", do you
13 think you would have accepted this piece of work?
14 A. No. No, I think that would have — had we taken on that
15 piece of work as Herefordshire Council, we would have
16 had to have outsourced that to a fire specialist,
17 because we didn't have that expertise within the
18 department, and quite honestly, if that were the case,
19 we would have said to LABC, "Look, just go straight to
20 fire consultant. There's no point coming to us in
21 between, you might as well go straight to a consultant."
22 Q. Yes.
23 You have referred to it, I think, now, a couple of
24 times; in the course of your review or looking at the
25 documents in order to write up your type approval

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1 summary, did you go to Approved Document B?
2 A. Yes, I did.
3 Q. To what section, can you remember? We'll come on to
4 look at it, if that will help.
5 A. I think it's section 12, the part that deals with
6 external fire spread.
7 Q. All right.
8 Moving now on in time, after your meeting with
9 Kingspan, can you tell us what work you did at that
10 stage? What research, if any, did you carry out after
11 the meeting?
12 A. After the meeting, I think I would have gone away, read
13 in detail the BBA certificate and the Kingspan
14 literature, referred to the notes I'd taken in the
15 meeting with Kingspan, and I would have related that
16 back to Approved Document B. Well, and some of the
17 other approved documents that are referred to in that
18 report, but mainly Approved Document B.
19 Q. Yes.
20 Did you consider it open to you, following your
21 meeting with Kingspan, to request more documents from
22 them if you had wanted to do so?
23 A. Yes, I wouldn't have proceeded if I felt there were
24 documents I needed that I didn't have.
25 Q. No. You would have requested those?

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1 A. Yes.
 2 Q. But you felt, am I right, at the time that what you had
 3 was enough?
 4 A. I felt that what I had was enough to — for the scope of
 5 the exercise that LABC had delegated to us.
 6 Q. Yes.
 7 If we can go, please, to page 22 of your first
 8 witness statement {HBC00000029/22}, and to the first
 9 paragraph there, you summarise essentially what you did
 10 after the meeting with Kingspan. You say:
 11 "To the best of my recollection ..."
 12 Actually, I think you're summarising the process in
 13 general:
 14 "To the best of my recollection it began with me
 15 attending an initial meeting with Kingspan technical
 16 representatives at their offices. Followed by a review
 17 of the technical literature provided for the product ...
 18 and the BBA certification for the product ... alongside
 19 the functional requirements of part B of the building
 20 regulations and the guidance in Approved Document B."
 21 Yes?
 22 A. Yes.
 23 Q. When you describe there "alongside the functional
 24 requirements of part B ... [and] Approved Document B",
 25 in very practical terms, do you mean that you had

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1 Approved Document B open in front of you while you were
 2 drafting this summary?
 3 A. When I say "alongside", I'm not meaning physically
 4 alongside, but looking at the documents in tandem,
 5 looking at them and relating them to one another.
 6 Q. Yes. All right.
 7 If we go on to the second paragraph there, you say
 8 that your findings were drawn together in the form of
 9 a typed summary, and then you say that initially that
 10 was for the purpose of an internal review; yes?
 11 A. Yes, that would have been the first stage.
 12 Q. You go on:
 13 "The internal review was held at one of the regular
 14 team meetings we used to hold (monthly I recall)
 15 involving myself, the building control manager and the
 16 other four senior building control surveyors. There are
 17 no written records of these meetings. For the most part
 18 these meetings were focused on technical matters and
 19 attempted, through discussion, to gain a common approach
 20 to matters which were open to different ways of
 21 interpretation. The review would not have been
 22 particularly in depth and would have involved informal
 23 discussion about the key features of the product
 24 review."
 25 Yes?

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1 A. Yes.
 2 Q. Did you explain to any of the colleagues at that meeting
 3 that you had formed a judgement that K15 was a material
 4 of limited combustibility, can you remember?
 5 A. I can't remember, but I think as one of the key features
 6 in the report it would have been mentioned, yes.
 7 Q. Yes. What was their reaction, can you recall?
 8 A. I can't recall exactly what the reactions were, but
 9 there was no challenge. Nobody said, "Wait, hang on".
 10 Q. No, no strong disagreement?
 11 A. No.
 12 Q. All right.
 13 At that stage, did you take any kind of other
 14 informal advice about any aspect of your assessment of
 15 K15?
 16 A. No, I didn't.
 17 Q. Can we go now, please, to page 27 of your first witness
 18 statement {HBC00000029/27}. If we look at the final
 19 paragraph on that page, you say:
 20 "I did not see the need to seek further advice
 21 beyond this in the knowledge that the work I was doing
 22 would ultimately be checked and verified by LABC.
 23 I cannot answer for any LABC employees in respect of
 24 this question, but if they did then I was not told."
 25 Yes?

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1 A. Yes.
 2 Q. I think we may come back to the question of what checks
 3 you understood would be carried out by the LABC
 4 following your assessment, but for now, do you mean that
 5 the only reason you took no further advice on your
 6 assessment was because you were aware that there was
 7 some system of checks to be carried out by the LABC?
 8 A. I think that was very significant, yes, to me. The
 9 knowledge that it was going to go through a further
 10 level of checking gave me more — well, in the first
 11 instance, it gave me more confidence to have a go at it,
 12 you know, at a time when I was doubting my ability to do
 13 it right back at the start. But also at this stage
 14 knowing that others would be looking at it and vetting
 15 it through the LABC network, I think that was a — that
 16 gave it a sort of robustness to me that I thought: okay,
 17 I can put this in as it is and see what comments come
 18 back.
 19 Q. I see. So is it fair for me to say that it was a source
 20 of comfort to you that that would be taking place?
 21 A. Yes, "comfort" would be the right word, yes.
 22 Q. All right.
 23 When you described then the issues you had around
 24 your confidence as to whether or not you could carry out
 25 this assessment right at the beginning before you spoke

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1 with the LABC, are you telling us that, once you had
 2 spoken with the LABC, you had no further concerns about
 3 your ability to carry this out?
 4 A. I still saw it as something quite challenging because it
 5 was very new to me. There was no question about that.
 6 I wasn't suddenly confident to do something new. But
 7 I think that the nature of that discussion and the very
 8 limited scope that they were asking made me think that:
 9 well, actually, perhaps — in terms of that scope,
 10 perhaps I can do this, and in any case somebody would be
 11 checking it afterwards. So between us, between
 12 Kingspan, Herefordshire Council and LABC, whoever they
 13 used for the checking, we should have been able to come
 14 up with something meaningful.
 15 Q. As a collaboration, essentially, which is what I think
 16 you described it as earlier?
 17 A. Yes, that's exactly right.
 18 MS TROUP: All right.
 19 Mr Jones, again, I'm going to just pause for
 20 a moment there in order to ask the Chairman whether this
 21 might, looking at the time, be an appropriate time to
 22 stop for lunch. I realise, again, a little bit early,
 23 but it's a good time in terms of how we're running.
 24 SIR MARTIN MOORE—BICK: All right. And it's obviously
 25 convenient from your point of view, in terms of

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1 questions?
 2 MS TROUP: It is.
 3 SIR MARTIN MOORE—BICK: All right.
 4 Well, it's very nearly 1 o'clock, Mr Jones. I think
 5 we can stop there to have some lunch.
 6 We will resume at 2 o'clock, please, and please
 7 don't talk to anyone over the break either about your
 8 evidence or anything relating to it. All right?
 9 THE WITNESS: Right, yes.
 10 SIR MARTIN MOORE—BICK: We will see you at 2 o'clock, then.
 11 Thank you very much.
 12 THE WITNESS: Thank you.
 13 (12.57 pm)
 14 (The short adjournment)
 15 (2.00 pm)
 16 SIR MARTIN MOORE—BICK: Welcome back, everyone. We're now
 17 going to resume hearing evidence from Mr David Jones.
 18 I will begin by checking that Mr Jones can see me and
 19 hear me well.
 20 Mr Jones, good afternoon.
 21 THE WITNESS: Yes, I can.
 22 SIR MARTIN MOORE—BICK: Good, thank you very much. Are you
 23 ready to continue? Is there anything you want to raise
 24 first?
 25 THE WITNESS: No, no, I'm ready to carry on.

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1 SIR MARTIN MOORE—BICK: Very good. In that case, I'll
 2 invite Ms Troup to go on with her questions.
 3 Yes, Ms Troup.
 4 MS TROUP: Thank you.
 5 Mr Jones, I want to take us forward a little in the
 6 timeline. I'm going to ask you to look now at an email
 7 which is at {LABC0002281}. It's a series of emails,
 8 rather, from January 2009.
 9 If we go to the second email in the chain, please,
 10 which is yours, you sent an email to Phil Harrison at
 11 the LABC on 14 January 2009 at 11.07. Do you see it?
 12 A. Yes, I do.
 13 Q. I just want to read through that with you. You say:
 14 "Dear Phil, I have been following up on your e-mail
 15 below with regard to a type approval for Kingspan's
 16 rainscreen cladding insulation board, and if
 17 I understand the process correctly I now need to pass it
 18 back to LABC for an invoice to be raised etc.
 19 "I met with Andrew Pack before Christmas to discuss
 20 what we could offer them through the type approval
 21 scheme and suggested that, in view of the scope of the
 22 certificate, the minimum fee of £500 would be adequate.
 23 He was keen to proceed with this after our meeting and
 24 so I have since carried on and done the necessary work
 25 to produce the certificate, though I haven't forwarded

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1 anything on to Andrew as yet."
 2 Pausing there, on what basis had you determined at
 3 that stage that the minimum fee for your work of £500
 4 would be adequate?
 5 A. I believe that was based on the original brief given to
 6 me by LABC, the subsequent discussion with Kingspan
 7 about what they wanted, and sort of a final agreement
 8 that, yes, that scope is — everybody had a common
 9 understanding then that that was the scope and that that
 10 was the fee that would be done.
 11 And I believe, going back further, I'm sure there
 12 were conversations with LABC where the minimum fee was
 13 discussed, you know, on the basis that, actually, you're
 14 not going any further than the BBA certificate, so it's
 15 not going to be a long, drawn-out process.
 16 Q. Yes, so it was fairly straightforward, so in your mind
 17 the minimum fee was appropriate; is that it?
 18 A. For what had been asked of us, yes, yes.
 19 Q. If we go on in that email, you say, this is at the third
 20 paragraph:
 21 "The most we can really offer in this case would be
 22 a product approval. K15 is just the insulation
 23 component of the rainscreen walling system — both the
 24 inner structural frame and the rainscreen cladding
 25 itself are unknown variables produced by a third party

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1 and so a system approval would be impossible to pin
 2 down. I did emphasise this to Andrew to be clear that
 3 the type approval would not go any further than the
 4 current BBA certificate, but he was happy that it would
 5 still be worthwhile if only to get the LABC 'seal of
 6 approval'."

7 So, again, just pausing there, I think that accords,
 8 would you say, with what you have told us about
 9 Kingspan's aim in having their product associated with
 10 the LABC brand, it was a marketing aim?

11 A. Yes, I think that it does sort of support that, and also
 12 shows that I'm still wrangling over this difference
 13 between product and system at this stage.

14 Q. It does, doesn't it? Because in that paragraph, if we
 15 look at the third line, you have actually said "a system
 16 approval would be impossible to pin down".

17 A. Yes.

18 Q. So can I take it from that, given that by the time the
 19 certificate was issued it was in fact a system approval,
 20 that you had done further work and you had developed
 21 your thinking further and found a way forward to make it
 22 into a system approval?

23 A. No, because the report that I'm forwarding to
 24 Phil Harrison under cover of this email is the same
 25 report that went to them finally to — for consideration

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1 against the certificate. So the report as we — or my
 2 report, as we've seen it, was already in existence at
 3 this stage.

4 But I think throughout it was always in my mind
 5 a product approval, and even though ultimately it came
 6 out from LABC on a form titled "system approval", to me
 7 it was still essentially a product approval, in that how
 8 could it be anything else, because only one product was
 9 actually defined in it, and I think that the fact the
 10 certificate was titled "system approval" comes back to
 11 this original point of LABC, that the terminology is all
 12 wrong, we have to call it system approval because that's
 13 what our forms say.

14 Q. Yes.

15 Would you agree, despite the fact that to you it was
 16 always a product approval, that that would not be
 17 apparent to a reader of the certificate?

18 A. Reading it now, I can see that, yes, yeah. Where LABC
 19 perhaps said, "Don't worry about it, we're going to be
 20 revamping this soon, but just go with what you've got",
 21 actually we shouldn't have done that, it should have
 22 been made clearer that we were just talking about
 23 a product.

24 Q. When did you come to determine that, Mr Jones, that it
 25 should have been made clearer and it shouldn't have been

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1 done in this way?

2 A. I think that's more over the last year and a half, in
 3 seeing, perhaps, how the certificate was used after it
 4 sort of left LABC and what Kingspan were doing with it.

5 Q. Yes. All right.

6 If we can go on in this email, if we start at the
 7 final paragraph we can see there, you go on to give
 8 Mr Harrison an outline of how you intend to approach
 9 your summary, and you say this:

10 "I would suggest then that the type approval
 11 certificate be for K15 as part of a generic (but
 12 undefined) system, and refer to the following documents
 13 (all attached):

14 " ■ Our summary of building regs compliance issues
 15 considered.

16 " ■ BBA Certificate 08/4582.

17 " ■ Kingspan's own literature.

18 "I would grateful if you could let me know what the
 19 next step should be ..."

20 Yes?

21 A. Yes.

22 Q. Attached to this was your type approval summary, was it?

23 A. Yes.

24 Q. Right.

25 If we can go up, then, please, to Mr Harrison's

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1 response to you, which is at the top of page 1, he says
 2 there, and this is 19 January:

3 "Good morning Dave

4 "Attached for your use, as agreed, are the latest
 5 versions of a Type Approval Application Form and the
 6 Compliance Declaration.

7 "Thank you for sorting this out so thoroughly."

8 Did you take from this email approval by the LABC of
 9 the work you had done?

10 A. I did at that stage, yes, although knowing that I was
 11 sending them the type approval at this stage for the
 12 first time, I obviously knew that the checking process
 13 hadn't yet occurred, so I knew that was still to come.

14 Q. I see.

15 A. And I imagined that during the course of that process,
 16 if any queries arose then LABC would come back to me to
 17 discuss.

18 Q. Yes.

19 Do you know whether Phil Harrison had a technical
 20 role at the LABC?

21 A. I didn't know anything much about Phil Harrison's
 22 background. His title, I think, was business
 23 development, which suggests marketing.

24 Q. It does.

25 A. But I don't know whether — you know, he could have been

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1 a technical practitioner who went into marketing —
 2 Q. Sure.
 3 A. — I don't know.
 4 Q. I'm sorry, I overspoke you again.
 5 A. That's okay, I'd finished.
 6 Q. All right.
 7 He mentioned in that email a compliance declaration
 8 form, he sent that to you. If we could go to that, now,
 9 please, that's at {HBC00000021/2}, please. That is the
 10 compliance declaration form, isn't it?
 11 A. Yes.
 12 Q. Did you fill out the main body of that form?
 13 A. I believe I did, yes, yes.
 14 Q. I think you have blacked out "no" or "yes" as
 15 appropriate in the middle section, "Extent of
 16 Recommended Regulatory Approval"; is that right?
 17 A. Yes.
 18 Q. If we go to the bottom of that page, please, we can see
 19 that the document is unsigned and undated.
 20 Did you understand that to be for signature and
 21 dating by the LABC? Was it for them to declare
 22 compliance or you?
 23 A. My understanding was that it was for them to declare
 24 compliance because this — what I was sending them at
 25 this stage still had a number of processes to go through

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1 before it became an LABC certificate. So ultimately
 2 compliance would be the sum of all these exercises,
 3 including the checking that was still to come. So, no,
 4 I wouldn't have anticipated when I sent this that this
 5 was the be all and end all, this is how it would look.
 6 This was just me sending to LABC everything that I'd
 7 considered for them to take on board, and for them to
 8 check as necessary and for them to ultimately issue
 9 a certificate.
 10 I think the fact that it's not signed is more likely
 11 to be because I sent it as an electronic document and
 12 didn't sign it.
 13 Q. Fine. All right.
 14 I want to take you now, please, to the LABC approval
 15 certificate and to the summary that you prepared. So if
 16 we can go, please, to {KIN00005705}, please.
 17 So that's the certificate itself at page 1, and it's
 18 dated in the right-hand top corner 1 May 2009. Yes?
 19 A. Yes.
 20 Q. Just looking through it, at section 1, we see the
 21 certificate holder's details, that's obviously Kingspan.
 22 Then we see at section 2, "System Title":
 23 "Description: Kingspan Kooltherm K15 Rainscreen
 24 Board."
 25 I mean, we have been over this, but K15 is not

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1 a system, is it?
 2 A. No. No, it's not.
 3 Q. At section 3, if we can move down, at the second
 4 subheading in section 3 we see an area called "Drawings
 5 and documentation to be referred to"; do you see that?
 6 A. Yes, yeah.
 7 Q. Just to clear it up, the first document referred to in
 8 that list, "Herefordshire Council Type Approval
 9 Summary — Revision 1; 03 March 2008", that date, I think
 10 you've explained in your witness statement, is
 11 a typographical error, isn't it?
 12 A. Yes, it is.
 13 Q. There was no earlier type approval summary?
 14 A. No, no.
 15 Q. That is in fact a reference to your type approval
 16 summary from 2009?
 17 A. That's right, yes, yeah.
 18 Q. All right. So the two documents we're left with are
 19 "Kingspan Publication Kooltherm K15 Rainscreen Board
 20 Eighth Issue November 2008", and a BBA certificate
 21 08/4582 dated 27 October 2008; yes?
 22 A. Yes.
 23 Q. If we can go on, please, to page 3 {KIN00005705/3} —
 24 there is actually a blank page at page 2 — this is the
 25 type approval summary; yes?

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1 A. Yes.
 2 Q. Just to be clear, the wording in this summary, all of it
 3 is yours; yes?
 4 A. Yes.
 5 Q. Right.
 6 We see there a section at the start called
 7 "Overview", which describes the product; would you
 8 agree?
 9 A. Yes.
 10 Q. And then below that a heading, "The System". If we can
 11 scroll down a little bit, please, I would like to look
 12 at the whole of that section, "The System".
 13 So you say here in the opening paragraph:
 14 "The overall wall construction must reflect standard
 15 design details as shown in Figures 1, 2 and 3 of
 16 Kingspan technical literature 'Kooltherm K15 Rainscreen
 17 Board', Eighth Issue November 2008. The standard forms
 18 of construction contained therein and as considered
 19 under this system approval would consist of ..."
 20 Then you have four bullet points.
 21 Am I correct in thinking that what you have done
 22 there is explained what can be seen in figures 1, 2
 23 and 3 within Kingspan's marketing literature?
 24 A. Yes.
 25 Q. If we look at the fourth bullet point, please:

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1 "A rainscreen cladding weathering layer structurally
2 fixed back to the inner substrate ..."
3 Those first words, "A rainscreen cladding weathering
4 layer", could be taken to mean any rainscreen cladding;
5 do you agree?
6 A. It could, although I think further on in the document
7 I limit that to a fire performance of limited
8 combustibility.
9 Q. Yes. In fact, at the first bullet point you've
10 specified from Kingspan's marketing literature that the
11 inner substrate needs to be reinforced concrete, masonry
12 or hollow metal-framed walling forming part of the
13 building superstructure; yes?
14 A. Yes.
15 Q. Can we go to the fourth page {KIN00005705/4} and the
16 heading "Requirement B".
17 So if we look at, "Requirement B — Fire Safety
18 Considerations", we see there the words:
19 "K15 has been tested in accordance with ..."
20 And you then list four test methods: 8414—1, 1364—1
21 and BS 476—6 and 7.
22 Under that, we see this sentence:
23 "From the results, it can be considered as
24 a material of limited combustibility and meets the
25 criteria for Class 0 classification for surface spread

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1 of flame."
2 Just to be absolutely clear, you had not at any time
3 seen the test results to which you are referring the
4 reader there, had you?
5 A. No, no, I'd copied those out of the BBA certificate,
6 I believe.
7 Q. Just looking quite strictly at the wording you have
8 used, "From the results, it can be considered", which of
9 the test standards listed in that section did you
10 consider gave a result that could lead to the class 0
11 classification you cited? Did you know?
12 A. No, the class 0 classification was simply repeating what
13 was stated in the BBA certificate.
14 Q. But did you know at the time or do you know now whether
15 any of those test standards can lead to that
16 classification?
17 A. I don't believe I knew fully at the time, but I do know
18 now that the reference to class 0 was misplaced, both on
19 the BBA certificate and repeated here. Or I believe it
20 to be. I'm not ...
21 Q. You believe it to be misplaced?
22 A. I don't believe the test results listed there are able
23 to give a class 0 classification.
24 Q. I see. I might have used the wrong phrase. There are
25 no actual test results listed there; these are simply

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1 the test standards, aren't they?
2 A. Sorry, the test standards, yes.
3 Q. No, no, I'm not correcting you, I'm correcting myself.
4 Looking at the same wording, "From the results, it
5 can be considered", which of the test standards listed
6 there did you consider gave a result that could lead to
7 the material being one of limited combustibility?
8 A. I think the key one was the BS 8414, where I'd been told
9 that: here we've put this product into a system test
10 where only limited combustibility will suffice and it's
11 passed. So as far as those test standards go, it would
12 be the first one, BS 8414, although that wasn't the only
13 thing that led me to the "limited combustibility"
14 wording. It was a range of factors that I took as
15 a whole to make a judgement —
16 Q. Yes. We'll come on to those factors.
17 By the time this certificate was issued, had you
18 looked up or read any one of those test standards?
19 A. No.
20 Q. If we go on to page 5 {KIN00005705/5}, now, please, at
21 the top there is a section entitled "Requirement B4;
22 External Fire Spread", and I'm going to read that with
23 you, the first paragraph certainly:
24 "Since K15 can be considered a material of limited
25 combustibility, it is suitable for use in all situations

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1 shown on Diagram 40 of Approved Document B Volume 2,
2 including those parts of a building more than 18m above
3 the ground. In the latter circumstances, the cladding
4 system and the substrate to which the insulation is
5 applied must also meet the requirement for limited
6 combustibility. Where the substrate is a metal-framed
7 wall system rather than masonry or concrete,
8 a non-combustible lining board must be specified to the
9 external face of the metal frame wall (eg. calcium
10 silicate board or similar performing)."
11 Essentially, you're repeating there what you had
12 said to Mr Harrison in your email of 14 January 2009,
13 and what I mean by that is that since K15 can be
14 considered — I think this is what you mean —
15 a material of limited combustibility, and because you're
16 extending this to be some sort of system approval, it is
17 suitable for use over 18 metres as long as all the other
18 components of the external wall arrangement are also
19 materials of limited combustibility. Is that what you
20 intended this to mean?
21 A. Yes, I believe so, yes.
22 Q. All right.
23 Can we go, please, to page 35 of your first witness
24 statement {HBC00000029/35}, and we're going to go
25 through now the factors which you have set out which led

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1 you to form a judgement that this was a material of
 2 limited combustibility.
 3 The question is at question 57:
 4 "Which test results, in specific terms, led to the
 5 assertion that K15 'can be considered a material of
 6 limited combustibility'?"
 7 You start that by saying:
 8 "As building control surveyors, we were conditioned
 9 (and expected) to gather evidence and use our judgement
 10 when considering the compliance or otherwise of building
 11 work."
 12 Yes?
 13 A. Yes.
 14 Q. "When assessing the combustibility of K15 I considered
 15 each of the following ..."
 16 We will start with (a), you say there:
 17 "The claims about the material and its properties
 18 discussed in the initial meeting with Kingspan."
 19 Now, I think we've dealt with that meeting in some
 20 detail now. Are you able to assist any further as to
 21 which claims made in the meeting specifically influenced
 22 your decision that K15 could be considered to be
 23 a material of limited combustibility?
 24 A. It's the claims from that meeting that the BS 8414 test
 25 pass has been achieved because of K15's combustibility

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1 characteristics, as in, you know, when put in that
 2 system, it did not burn to any great degree to cause
 3 a risk. So it was that claim that I was referring to in
 4 bullet point (a) there.
 5 Q. Thank you.
 6 Going on to (b), your second factor is:
 7 "The statement on the first page of the BBA
 8 certificate 'Behaviour in relation to fire — the boards
 9 will not contribute to the development stages of a fire
 10 or present a smoke or toxic hazard.'"
 11 Just to put it in context, let's get that up,
 12 please. The document is {BBA00000038/1}.
 13 So if we just identify this, this is BBA
 14 certificate 08/4582, and if you look to the bottom
 15 left — hand corner, we can see it's dated 27 October 2008.
 16 Do you see that?
 17 A. Yes.
 18 Q. I think we can agree, can we, that this is the one you
 19 saw at the time of your assessment?
 20 A. Yes, it is.
 21 Q. Right.
 22 Looking at this page, do you see under the heading
 23 "Key factors assessed" there are four factors listed in
 24 bold?
 25 A. Yes.

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1 Q. The fourth is "Behaviour in relation to fire", and
 2 I think that is the phrase you're referring to at your
 3 paragraph (b) in your witness statement we've just
 4 looked at:
 5 "The boards will not contribute to the development
 6 stages of a fire or present a smoke or toxic hazard ..."
 7 Yes?
 8 A. Yes.
 9 Q. I understand your evidence is that this particular
 10 assertion formed part of your consideration in forming
 11 your judgement as to the combustibility or otherwise of
 12 the product.
 13 Can we go back, please, to page 45 of your first
 14 witness statement {HBC00000029/45}, where separately you
 15 were asked about this particular assertion in the
 16 BBA certificate.
 17 It's at Inquiry question 78, you're asked about the
 18 meaning of it, and you said:
 19 "I took this to mean that the K15 boards were not
 20 capable of burning to an extent where they could
 21 contribute towards the development or spread of a fire.
 22 This was one of the statements which led me to conclude
 23 that K15 was of limited combustibility."
 24 Yes?
 25 A. Yes, yeah.

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1 Q. Was this particular factor and that assertion in the
 2 BBA certificate something you ever considered taking any
 3 advice on, or did you consider it to be sufficiently
 4 clear?
 5 A. It was quite a direct statement and I took it as it
 6 reads. It was quite — it was very significant to me at
 7 that time in terms of this judgement on the
 8 combustibility of the product.
 9 Q. It was very significant —
 10 A. Very significant indeed.
 11 Q. I'm so sorry, I just spoke over you. Go ahead.
 12 A. Sorry, yes, it was very significant, and I think without
 13 that statement, I don't think the other factors
 14 I considered would have been enough to make the
 15 judgement as to limited combustibility.
 16 Q. I see. So this is the one that sort of swung the
 17 balance towards limited combustibility, was it?
 18 A. Yes, yes.
 19 Q. All right.
 20 Going back to your list of factors in your witness
 21 statement at page 36 {HBC00000029/36}, if we look at (c)
 22 and (d), I would like to take those together because
 23 they go together. If I read those to you, you say:
 24 "c) The fact, as stated in both the BBA certificate
 25 and the Kingspan literature that the product had been

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1 successfully tested to BS8414. It would have been my
2 view at the time that the insulation board would have to
3 be a material of limited combustibility to pass such
4 a test."

5 Then that's essentially repeated in (d) in respect
6 of BR 135. Do you see?

7 A. Yes.

8 Q. Right.

9 So as far as I understand from your evidence thus
10 far, although you used the plural there in the second
11 line of paragraph (d), you were aware, I think, that
12 only one test to 8414 had been carried out on a system
13 incorporating K15?

14 A. Yes, I believe that to be right, yes.

15 Q. And you understood that BS 8414 was a system test, not
16 a product test.

17 A. Yes.

18 Q. I think you said earlier that you had not understood at
19 the time that it was a system test meaning that every
20 component — these were not your words, I'm summarising,
21 but I think you said that you had not understood that
22 every component part of the system and every part of it
23 would have to be replicated exactly in order to be used
24 in compliance with Approved Document B; is that right?

25 A. That's right, yes.

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1 Q. When did you come to understand that the system had to
2 be replicated exactly?

3 A. In the last 16 months while reviewing the matter for
4 this Inquiry.

5 Q. Yes.

6 All right, I want to ask you now about the second
7 sentence, which is mirrored at paragraphs (c) and (d):
8 "It would have been my view at the time that the
9 insulation board would have to be a material of limited
10 combustibility to pass such a test."

11 We've referred to this a few times in terms of the
12 meeting that you had with Kingspan.

13 I just want to be absolutely clear: what do you mean
14 by that sentence, "the insulation board would have to be
15 a material of limited combustibility to pass such
16 a test"?

17 A. I think it links to what I was saying of my impression
18 from Kingspan at that meeting, this principle that the
19 product had been put into a test situation where
20 a limited combustibility material would be
21 a requirement, would be the minimum requirement, and
22 it's passed, it's behaved as it would be expected to be.
23 So I think after that meeting, that gave me the view
24 that it must perform equally to a material of limited
25 combustibility in order to have passed the BS 8414 test.

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1 Q. Ah. Now, I would draw a slight distinction between what
2 you have said there, it would have to perform equally to
3 a material of limited combustibility, and the wording in
4 your statement.

5 I just want to be absolutely clear on this, do you
6 mean that you understood that, in order to pass a test
7 to 8414, the board would have to be of limited
8 combustibility, or are you saying, as I think you've
9 just said, that it would have to perform equally to
10 a material of limited combustibility? They're not quite
11 the same —

12 A. I'm not sure my thought process at that — sorry?

13 Q. I'm so sorry, I said they're not quite the same, are
14 they, do you see?

15 A. They're not quite the same, no, you're right. I'm not
16 sure my thought process at that time would have drawn
17 the distinction between the two, but I think if you look
18 at the way I've written at that time in my report to
19 LABC, I've allowed that view to result in the conclusion
20 that it can be treated as a limited combustibility
21 material, not that it's like a material of limited
22 combustibility.

23 Q. Forgive me, just to make sure that I haven't
24 misunderstood, I'm not sure you say in the certificate
25 it can be treated as a material of limited

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1 combustibility, do you? I think you say it can be
2 considered to be one.

3 A. Yes. Yes, that's right. I did.

4 Q. Right.

5 We spoke earlier about the fact that you referred
6 during your work on this assessment to Approved
7 Document B and, in particular, to section 12, I think.
8 I want to take you to that, please.

9 If we can go to {CLG10000007/95}, Mr Jones, this is
10 Approved Document B as it stood at the time that you
11 were carrying out your assessment, not as it stands now.

12 If we look on the right-hand side of the page,
13 towards the bottom under the heading "External wall
14 construction", that's paragraph 12.5, we see there the
15 following wording:

16 "The external envelope of a building should not
17 provide a medium for fire spread if it is likely to be
18 a risk to health or safety. The use of combustible
19 materials in the cladding system and extensive cavities
20 may present such a risk in tall buildings.

21 "External walls should either meet the guidance
22 given in paragraphs 12.6 to 12.9 or meet the performance
23 criteria given in the BRE Report ... (BR 135) for
24 cladding systems using full scale test data from
25 BS 8414—1 ... or [part] 2 ..."

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1 Yes?
 2 A. Yes.
 3 Q. So keeping that wording in mind, external walls should
 4 either meet the guidance in 12.6 to 12.9 or meet the
 5 performance criteria in BR 135, can we go over the page,
 6 please, to page 96 {CLG10000007/96} within ADB, and to
 7 paragraph 12.7. We can see that that is the relevant
 8 paragraph for insulation materials; yes?
 9 A. Yes.
 10 Q. "In a building with a storey 18m or more above ground
 11 level any insulation product, filler material (not
 12 including gaskets, sealants and similar) etc. used in
 13 the external wall construction should be of limited
 14 combustibility (see Appendix A)."
 15 What I want to ask first is this: did you read these
 16 two sections at the time you were carrying out your work
 17 on this assessment?
 18 A. I did, yes.
 19 Q. Would you agree with me, then, that it is clear that
 20 these two routes, if I can put it in that way, are
 21 alternatives: either the material is one of limited
 22 combustibility or it meets the criteria in BR 135?
 23 A. Yes, I can see that that is the case, yes.
 24 Q. Did you see that that was the case at the time?
 25 A. I've looked at this repeatedly over the last 14 months

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1 and tried to recreate my thought process when looking at
 2 this, and I found it difficult to recall how
 3 I interpreted it at the time. I think I can only say
 4 that I'd never used this section of Approved Document B
 5 before because it related to a type of building and
 6 a situation that had never come up for me previously.
 7 Q. Yes.
 8 A. And I would certainly not go about it in the same way
 9 again, but at the time, I'm not sure I had the ...
 10 I wasn't on the right track with it, I would say.
 11 Q. All right.
 12 Can I take it that you did not realise at the time
 13 that they were alternatives?
 14 A. I think I realised from the — or would have realised
 15 from the wording of it that that's two alternative
 16 approaches, but I think — it appears as if I've mixed
 17 and matched a bit there in terms of the limited
 18 combustibility term, which —
 19 Q. Yes.
 20 A. — I agree was not the right way to go about it.
 21 Q. Right. We will come on to that.
 22 I mean, in layman's terms, from reading is 12.5
 23 taken together with 12.7, if you are clear now that
 24 those are posed in the alternative, so either the
 25 material is one of limited combustibility or you meet

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1 the criteria in BR 135 by testing to BS 8414, it
 2 follows, doesn't it, that if K15 was a material of
 3 limited combustibility, there would be no need to test
 4 it to BS 8414?
 5 A. No, that would be right.
 6 Q. Did that occur to you at the time?
 7 A. I'm not sure quite how I thought about it at the time.
 8 I think it would have done in that I would have been
 9 able to read those paragraphs and understand them at the
 10 time. I just wasn't used to applying them in real-world
 11 situations.
 12 Q. I see.
 13 All right, let's go back to your list of factors in
 14 your witness statement, if we can go back to page 36
 15 {HBC00000029/36}, please, and to paragraph (e).
 16 So this is the next factor that contributed towards
 17 your decision to assert that the product was one of
 18 limited combustibility, and you say there:
 19 "The statement in section 7 of the BBA certificate
 20 that the product displayed limited fire spread away from
 21 the ... source."
 22 Let's go back and look at that, please. It's
 23 {BBA00000038/5}, section 7. The heading there is
 24 "Behaviour in relation to fire", do you see it?
 25 A. Yes.

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1 Q. It's quite tricky to find, but if you go to the end of
 2 the first quite big paragraph, to the final three lines,
 3 at the third line up from the bottom beginning "Within",
 4 I think that's where that phrase comes from:
 5 "Within the stated test time the temperature at the
 6 level 2 thermocouples did not exceed 600°C, therefore
 7 displaying limited fire spread away from the fire source
 8 and that the product meets the criteria stated within
 9 BRE 135."
 10 That is the phrase you're referring to in your
 11 factor (e), is it?
 12 A. Yes, yes.
 13 Q. So that is contained within a description there of the
 14 way in which the system tested to BS 8414 is said to
 15 have met the criteria in BR 135?
 16 A. Yes.
 17 Q. While we're on this section, this makes clear, does it
 18 not, this part of the BBA certificate, that there's one
 19 test to BS 8414?
 20 A. Yes.
 21 Q. And that that is to part 1?
 22 A. Yes.
 23 Q. When you saw that, did it prompt you to look up either
 24 part 1 or part 2, or even a summary of the differences
 25 between them?

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1 A. I don't believe it did. I believe I was led by the
 2 comment in the third line down — actually, in the first
 3 line, where it refers to a non-combustible substrate,
 4 and I think that led my thought process to a more
 5 generic non-combustible substrate being the parameter of
 6 this test.
 7 Q. Yes, and as far as I understand it from your evidence,
 8 that accorded with what you were told by Kingspan when
 9 you met with them, did it?
 10 A. It did, and this was a big part of the process for me,
 11 that when I came away from the meeting, what I was
 12 seeking to do was go back to the BBA certificate and see
 13 if the statements and the impression I had been given in
 14 the meeting could be supported by the BBA certificate,
 15 and this was one of the phrases that led me that way and
 16 said: yes, okay, that is consistent with what Kingspan
 17 are saying.
 18 Q. Yes, I see. This appeared to you, on review, to be
 19 consistent with what either Andrew Pack or Philip Heath
 20 or both had told you?
 21 A. Yes, that's right.
 22 Q. I see. All right.
 23 Can we go back to your witness statement now at
 24 page 36 {HBC00000029/36} and to your factor at (f).
 25 You say there:

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1 "The reference in section 7 of the BBA certificate
 2 to a BS EN 1364-1 test where an assembly containing K15
 3 achieved a fire resistance of 53 minutes. It would have
 4 been my view at the time that the insulation board would
 5 have to be a material of limited combustibility to pass
 6 such a test to this standard."
 7 I don't think we need to go back to that in the
 8 BBA certificate. I just want to ask you this: on what
 9 basis did you determine that the result of
 10 a fire resistance test to BS EN 1364-1 could tell you
 11 anything at all about the combustibility of a product?
 12 A. I don't think — it didn't directly. I think
 13 paragraph (f) was just background information. It was
 14 just another piece of evidence in the background that
 15 suggested this insulation — it didn't readily burn, as
 16 I had been given to understand. So I understand that
 17 the test standard referred to there had no relevance and
 18 it wasn't mentioned at all in section 12 of Approved
 19 Document B, but it was just in terms of gathering as
 20 much evidence as I could to try and make a judgement, it
 21 was just another bit of background information.
 22 Q. Moving on to (g) then, you say there, I think this might
 23 be the last one:
 24 "The suggestion in paragraph 7.2 of the
 25 BBA certificate that K15 could be suitable for use with

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1 storeys over 18m if the certificate holder (Kingspan)
 2 were to say so, and the subsequent statement from
 3 Kingspan in their technical literature saying so — that
 4 K15 'is therefore acceptable for use above 18m in
 5 accordance with the building regulations.'"
 6 I want to take a look with you, please, at the
 7 product literature that was provided to you by Kingspan.
 8 That is at {KIN00009703}. The title of that piece of
 9 literature is "Kooltherm K15 Rainscreen Board,
 10 insulation for use behind rainscreen cladding systems".
 11 If we can just zoom in a little bit on the top
 12 right-hand corner, please, we can see that that is the
 13 eighth issue dated November 2008. Yes?
 14 A. Yes.
 15 Q. Moving to page 6 {KIN00009703/6}, please, if we look at
 16 the section on the left-hand side about halfway down
 17 entitled "Fire Performance", there in the smaller
 18 letters still, even smaller letters, we can see four
 19 test standards listed on the left, and result on the
 20 right. Yes?
 21 A. Yes.
 22 Q. Under that, under those four test standards and results,
 23 we see the following assertion:
 24 "Kingspan Kooltherm K15 Rainscreen Board meets the
 25 criteria within BR 135 (Fire performance of external

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1 thermal insulation for walls of multi-storey buildings),
 2 and is therefore acceptable for use above 18 metres in
 3 accordance with the Building Regulations/Standards."
 4 Is that the section to which you were referring in
 5 your witness statement?
 6 A. Yes, I have referred to that paragraph, which — I think
 7 that was, whether consciously or not, instrumental in
 8 leading me towards the combustibility approach, because
 9 I suppose there's only one way that Kingspan could make
 10 such a blanket statement about the product, and that is
 11 to link it to the performance of the product rather than
 12 the system. Because that is a blanket statement.
 13 Nowhere in that document does it say that actually only
 14 applies in certain very limited circumstances, and
 15 I think perhaps in my mind I was trying to rationalise
 16 that, to say, actually, in order to say that, you've got
 17 to be prepared to allocate some characteristics to this
 18 product. How can this product be suitable for use in
 19 situations above 18 metres on a blanket basis like that,
 20 unless we're talking about the combustibility properties
 21 of the product?
 22 Q. Yes.
 23 Can we go back to that document, please,
 24 {KIN00009703/6}. When you say blanket statement, that
 25 statement we have just looked at, "is therefore

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1 acceptable for use above 18 metres", I think this is
 2 what you referred to earlier, it contains no caveat or
 3 qualification, does it?
 4 A. No, it doesn't, no. I find it very misleading now when
 5 I read it back, knowing the background to it.
 6 Q. I see.
 7 Can we go up, please, to page 2 {KIN00009703/2}.
 8 I want to look with you at the diagrams we discussed
 9 a little earlier, which you refer the reader of your
 10 type approval summary directly to. Do you remember?
 11 A. Yes, yeah.
 12 Q. So if we look at those, please, I think you said in
 13 relation to these — and we can go back and check it if
 14 not — that you saw these and understood them to be
 15 standard design details, again with no caveat or
 16 qualification as to any height restriction in terms of
 17 how they should be installed; is that right?
 18 A. That's right. We see these diagrams alongside that
 19 statement that K15 is suitable for use over 18 metres.
 20 No qualifications, no limitations. So I think it's very
 21 misleading to put those diagrams there and then read
 22 those alongside the BBA certificate describing
 23 a non-combustible substrate, which you have in each of
 24 those three diagrams, and a limited combustibility
 25 cladding panel, which again I believe we have in those

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1 three diagrams.
 2 So everything about those diagrams seems to lead you
 3 towards the 18-metre paragraph, and it left me with the
 4 impression that these three diagrams were all within the
 5 parameters of the test that allowed Kingspan to claim
 6 the 18-metre suitability.
 7 Q. On the basis that there is nothing there to say that
 8 these fall outside the parameters of that test?
 9 A. That's right, yes. Yeah.
 10 Q. So did you examine these diagrams and the wording around
 11 them during your assessment?
 12 A. I would — yes, I would have examined them, and looking
 13 at the key factors, as in the combustibility of the
 14 substrate and the cladding panels.
 15 Q. Yes. All right.
 16 Can we go back now, please, the BBA certificate
 17 {BBA00000038/6}, section 7.3. Here we see the BBA
 18 advising as follows:
 19 "In buildings with a floor more than 18m above
 20 ground level, advice should be sought from the
 21 Certificate holder."
 22 Is that what you were referring to, Mr Jones, when
 23 you said in the section of your statement that we've
 24 just looked through, "The BBA certificate says that it's
 25 okay for use over 18 metres if Kingspan were to say so"?

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1 A. That's right, yes, yes, this refers you to Kingspan, and
 2 of course I was talking to Kingspan about this, so ...
 3 yes.
 4 Q. Yes. Did it strike you at the time as all a bit
 5 circular, that Kingspan cite their BBA certificate, and
 6 when you go to the BBA certificate, if you're looking to
 7 use the product over 18 metres, you're directed back to
 8 Kingspan?
 9 A. Yes, I'm not sure if it did at the time, but it
 10 certainly does now, yes.
 11 Q. All right.
 12 Can we go to your witness statement, please, page 36
 13 {HBC00000029/36}. I'm afraid I was wrong, there is one
 14 more factor that we need to take a look at there which
 15 contributed towards your judgement that the product was
 16 one of limited combustibility. That's this, at (h):
 17 "The assertion in both the BBA certificate and the
 18 Kingspan literature that K15 is classified as a Class 0
 19 product, not in itself evidence of limited
 20 combustibility as discussed under a previous question,
 21 but another piece of evidence which, viewed alongside
 22 all of the above, would have helped support the
 23 judgement that it was."
 24 Yes?
 25 A. Yes.

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1 Q. In what way did you determine that a classification to
 2 class 0 helped support a judgement that a product was
 3 one of limited combustibility?
 4 A. Only to link to one of my previous answers where
 5 I talked about class 0 products having a surface
 6 material that would more often than not be of limited
 7 combustibility, the very feature that allows it to pass
 8 a test to class 0, and the fact that in the case of K15,
 9 it's a solid block of insulation, so the material that
 10 has achieved class 0 on the surface is the same material
 11 all the way through. And again, this is not a direct
 12 link to limited combustibility, but it's another piece
 13 of background information. When I'm gathering the
 14 evidence to try and make a judgement one way or the
 15 other, it's another bit of background information which
 16 pushes me towards the conclusion I made.
 17 Q. All right.
 18 I want to ask you something else about (h).
 19 I notice in the final line of that paragraph that you
 20 use the word "would", "would have helped support the
 21 judgement that it was", and in fact I think you've used
 22 that in some of these other factors that you have set
 23 out for us. It may just be the way that it's been
 24 phrased, but so that I'm clear, is it your evidence that
 25 you considered at the time each of these factors that

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1 you have listed here in your witness statement at (a) to
 2 (h), or is it on having been asked about it that you
 3 have thought it through in this way?
 4 A. No, I recall looking at each of those examples listed at
 5 the time and using them all to make a judgement.
 6 Q. I see. All right.
 7 I'm going to look with you, under (h), at the next
 8 paragraph, and just read from there:
 9 "On the basis of my knowledge at that time the range
 10 of evidence in a) to h) above was sufficient for me to
 11 make a judgement that K15 could be considered a material
 12 of limited combustibility.
 13 "I was aware that if defined as a material of
 14 limited combustibility it could in principle be used in
 15 storeys over 18m in accordance with paragraph 12.7 of
 16 Approved Document B, but I was being told by the BBA
 17 certificate and the Kingspan literature that K15 had met
 18 the criteria for BR 135 so had already been ... proved
 19 to be suitable for storeys over 18m in any case."
 20 Going over, please, to page 37 {HBC00000029/37}, at
 21 the top there:
 22 "My Type Approval summary to LABC was only
 23 confirming something which was supposedly already
 24 known."
 25 Yes?

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1 A. Yes, yeah.
 2 Q. Basically, is this right: you thought at the time that
 3 you were saying nothing new in your approval by calling
 4 this material one of limited combustibility?
 5 A. That is right. I thought I was simply re-presenting the
 6 information I'd been given, both verbally from Kingspan
 7 and in the documents they gave me. I honestly didn't
 8 appreciate at that time that using the words "limited
 9 combustibility" was opening any doors for Kingspan that
 10 hadn't already been opened by the information that was
 11 already available.
 12 Q. I see.
 13 When did you come to appreciate that using the
 14 specific words "a material of limited combustibility"
 15 would have the effect that you've just described?
 16 A. I don't think I had cause to revisit in that context in
 17 that detail until I was asked to contribute to
 18 the Inquiry in 2019.
 19 Q. Fine.
 20 Mr Jones, if that is the case and you were saying
 21 nothing new, and K15 was a material of limited
 22 combustibility, did it not strike you as odd at the time
 23 that neither the BBA certificate nor Kingspan's own
 24 product literature said so?
 25 A. I think perhaps I'd put a lot on that statement on

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1 page 1 of the BBA certificate that appeared to me to be
 2 saying — you know, that appeared to be describing
 3 a material that had a limited capacity to burn, and
 4 I made the link from that to limited combustibility.
 5 Q. Fine.
 6 Did you notice that neither the BBA certificate nor
 7 Kingspan's own product literature anywhere made the
 8 claim that K15 was a material of limited combustibility
 9 or could be considered to be one?
 10 A. I think I probably did, but, as I've said previously,
 11 I don't think at that time I was making a clear enough
 12 distinction between the specific phrase, "limited
 13 combustibility", and a product which had a limited
 14 capacity to burn. I understand now that that's two very
 15 different criteria, but I don't think I understood that
 16 at the time. So the fact that the specific phrase
 17 "limited combustibility" wasn't used, I don't think it
 18 registered with me as being significant at that time.
 19 Q. I see. At the time, you made your judgement on the
 20 basis of the matters we've just been through in some
 21 detail, and you considered at the time that your
 22 judgement was sound; is that right?
 23 A. I did, yes, yes.
 24 Q. All right.
 25 A. And I was also aware, of course, that this was just the

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1 first stage and that this would go forward for further
 2 checking and verification.
 3 Q. Yes.
 4 Can we just go back, please, to your witness
 5 statement at page 33 {HBC00000029/33}. I just want to
 6 look again with you at your answer to what your
 7 understanding was as to the meaning of the phrase
 8 "limited combustibility" in May 2009.
 9 I'm not sure that is the right page, actually. Just
 10 bear with me for a moment.
 11 (Pause)
 12 Yes, actually, let's look at that section. You say
 13 there in response to question 52:
 14 "I had made a judgement based on the range of
 15 statements and test results referred to in the documents
 16 reviewed that the product had a limited capacity to
 17 sustain fire, and was therefore limited in its
 18 combustibility."
 19 You have just explained that you did not appreciate
 20 at the time the distinction between those two things.
 21 Just to be absolutely clear with you, were you aware, in
 22 late 2008 and early 2009, that the words "of limited
 23 combustibility" have a defined and specific meaning
 24 within Approved Document B?
 25 A. Yes, I knew of the reference in Document B and

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1 appendix A, yes.

2 Q. I thought you said to us earlier — you must correct me

3 if I'm wrong — that it was from your analysis after the

4 Grenfell Tower fire that you had come to understand that

5 there was a specific and defined meaning for those

6 words.

7 A. No, I knew of the appendix A definition in the approved

8 document from having read section 12 during my

9 assessment of this product in 2008.

10 Q. I see. But in section 12, I think you're talking about

11 12.7, it simply says in brackets "appendix A".

12 A. Appendix A.

13 Q. Do you mean that you were aware that there existed

14 a definition or did you know what it was?

15 A. I knew that there existed a definition, but I would have

16 been very much in a frame of mind at the time that

17 that's an approved document definition, but there may be

18 other ways of proving the functional requirement, and

19 I think that's key to how I was trained to think as

20 a building control officer, to read requirements in

21 an approved document, but not just to reel them off

22 verbatim, to understand why they were asking for what

23 they were asking for.

24 So in 12.7, I asked myself: why is Approved

25 Document B asking for limited combustibility? What's

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1 the end objective of that? And of course it is to make

2 sure that the insulation product can't contribute to the

3 development of a fire. And then of course I come back

4 to the statement on page 1 of the BBA certificate, which

5 tells me: actually, it does achieve this aim. So not

6 via the definition in appendix A, but via a more

7 functional definition that says: this insulation will

8 not contribute to the spread of fire.

9 Q. I'm not sure I follow. We will come back to some of the

10 substance of what you have just described in terms of

11 your process of thinking, but in very basic terms, is

12 what you're saying this: you were aware from

13 paragraph 12.7 that there existed in appendix A

14 a definition of the phrase "limited combustibility"?

15 A. Yes.

16 Q. You did not look that up and were not aware of what that

17 definition was?

18 A. I believe I probably referred to it. I believe

19 I probably did look it up, yes, I wouldn't have

20 disregarded it.

21 Q. I'm so sorry, did you say you disregarded it?

22 A. No, I wouldn't have disregarded it, I would have

23 looked — I believe I would have looked it up having

24 seen it referred to in paragraph 12.7.

25 Q. I see. So you saw it referred to in 12.7, you went to

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1 appendix A, and then you decided, based on your training

2 and different ways to meet the functional requirements

3 of the Building Regulations, that you would give it

4 an alternative definition? Is that what you're saying?

5 A. That's right, that I'd seen the other statements, and in

6 particular that statement on the first page of the

7 BBA certificate, that indicated to me that the

8 functional requirement we would be looking for in

9 an insulation panel, ie that it not contribute to the

10 spread of a fire, is in the opinion of the BBA achieved,

11 because they say so in that statement, albeit that it

12 doesn't use the specific phrase "limited

13 combustibility".

14 Q. Yes. I think I follow what you're saying. I'm just

15 going to come back to this, I'm afraid.

16 You say that you did go to appendix A and decided to

17 come up with an alternative definition than the one you

18 found there for a material of limited combustibility.

19 I'm not sure that I'm clear on why you did that.

20 A. I think it was just a case of gathering the evidence

21 I had and saying: okay, there isn't a test report that

22 links to the definition of limited combustibility that

23 is in appendix A —

24 Q. No.

25 A. — but there is other evidence that seems to suggest

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1 that it achieves that functional requirement that

2 appendix A is trying to ensure.

3 Q. Did you not consider that you might be taking quite some

4 risk in unilaterally deciding to step outside of the

5 definition that is set out for you in Approved

6 Document B and coming up with an alternative one?

7 A. I think stepping outside of the strict criteria of the

8 approved documents was an established practice in

9 building control then. It was almost expected of us,

10 you know, that we be prepared to look at alternative

11 solutions in any given situation.

12 In terms of whether I thought it was a risk, I think

13 I probably read a great deal into the statement on the

14 BBA certificate in terms of how this product performs

15 when put in a fire situation.

16 Q. The statement on the first page that the boards will not

17 contribute to the development stages of a fire?

18 A. Yes.

19 Q. All right. I think I follow to some extent, and you

20 must forgive me, what you are saying about almost being

21 expected to step outside of the approved document

22 criteria and to come up with alternative ways of meeting

23 the functional requirements. I think I follow what

24 you're saying.

25 I'm not sure that I follow that in relation to

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1 stepping outside of defined terms, specifically defined
 2 phrases. That is surely a different matter, wouldn't
 3 you say?
 4 A. I ... perhaps, looking at it now, yes, but at the time
 5 it was such an established practice that it is okay to
 6 put the approved document to one side and look at other
 7 evidence that — I just think that's what I was doing at
 8 the time.
 9 Q. I mean, did it occur to you that you were not, on this
 10 occasion, stepping outside of the confines or the
 11 language of Approved Document B on one building project;
 12 you were certifying a product which might go on to be
 13 used in hundreds upon hundreds upon hundreds of building
 14 projects, and stepping outside the defined criteria of
 15 a material of limited combustibility to do so, you were
 16 taking an enormous risk, weren't you?
 17 A. I suppose I didn't see it that way at the time, because
 18 I knew that every actual building that was built would
 19 go through a full design and statutory approval process,
 20 you know, regardless of this LABC certificate. Every
 21 building would be approved on its own merits, as
 22 a bespoke design. So I felt there were other layers
 23 of ... other layers of checking that would ensure it was
 24 used appropriately.
 25 Q. Yes, all right.

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1 Can we go, please, to appendix A and specifically to
 2 table A7. We will find that at {CLG10000007/121},
 3 please.
 4 If you look on the right-hand side, under the
 5 heading "Materials of limited combustibility", we see
 6 there:
 7 "Materials of limited combustibility are defined in
 8 Table A7."
 9 Yes?
 10 A. Yes.
 11 Q. Do you think you looked at this?
 12 A. I believe I would have, yes. I know it because it was
 13 referred to in paragraph 12.7.
 14 Q. All right. So let's go to table A7, please, which is on
 15 page 132 of this document {CLG10000007/132}. If you
 16 look on the left-hand side of table A7, we see sort of
 17 three rows down the words:
 18 "References in AD B guidance to situations where
 19 such materials should be used."
 20 Yes?
 21 A. Yes.
 22 Q. Then if you follow that column down, if we scroll down,
 23 please, to number 8, we can see this specific situation:
 24 "Insulation material in external wall construction
 25 referred to in paragraph 12.7."

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1 Yes?
 2 A. Yes.
 3 Q. Then in the right-hand column, if we scroll back up,
 4 please, we see the definition of materials of limited
 5 combustibility is given to us for national class in the
 6 left-hand section, and if we go back down to number 8,
 7 we can see there that what can be defined as a material
 8 of limited combustibility for this situation is:
 9 "Any of the materials in (a), (b) or (c) above ..."
 10 And I'll come to those, or:
 11 "d. Any material of density less than 300kg/m³
 12 [it goes on] ... which when tested to BS 476-11 ..."
 13 So rather than reading that any further, it is
 14 right, I think, that no one had suggested to you that
 15 K15 had at any stage been tested to BS 476-11, had they?
 16 A. No.
 17 Q. You had seen no reference to a test to that part of
 18 BS 476?
 19 A. No.
 20 Q. So K15 cannot fall within (d), would you agree with me?
 21 A. I would, yes.
 22 Q. Let's go up, please, to look at (a), (b) and (c), if we
 23 just scroll up. We will come back to (a) because it's
 24 going to take us to another table. (b), again, this is
 25 a reference to particular results following a test to

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1 BS 476-11, and you have just agreed that you saw no
 2 reference to K15 being tested to that section; yes?
 3 A. Yes.
 4 Q. So it can't fall under (b), can it?
 5 A. No.
 6 Q. And at (c) we see a description:
 7 "Any material with a non-combustible core at least
 8 8mm thick having combustible facings (on one or both
 9 sides) ..."
 10 It goes on.
 11 K15 is not a material described there, is it?
 12 A. No, it's not.
 13 Q. Right. So we're left with (a).
 14 Let's go up, please, to table A6 at page 131
 15 {CLG10000007/131}. Here we come to four more options:
 16 (a), (b), (c) and (d).
 17 If we can deal first, please, with (a) and (d),
 18 again in (a) you're asked to look at particular results
 19 to BS 476-11, and you knew of no such tests; is that
 20 right?
 21 A. That's right, yes.
 22 Q. So we can scrap that one, K15 cannot fall under (a).
 23 Looking at (d), please:
 24 "Products classified as non-combustible under
 25 BS 476-4 ..."

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1 You had seen no indication of any testing at any
 2 stage to part 4 of BS 476 on K15, had you?
 3 A. No.
 4 Q. Right. So it can't fall under (d) either, and we're
 5 left with (b) and (c).
 6 (b) refers to totally inorganic material such as
 7 concrete, fired clay, ceramics, it goes on.
 8 K15 is not one of those materials, is it?
 9 A. No.
 10 Q. And we're left last with (c), concrete bricks or blocks
 11 meeting a particular British Standard.
 12 Well, K15 is certainly not either of those things,
 13 is it?
 14 A. No.
 15 Q. Mr Jones, in the simplest possible terms, just following
 16 this investigative trail which is set out for you in
 17 Approved Document B, rather than piecing together all
 18 the bits and pieces of evidence you appear to have
 19 picked up from the BBA certificate and Kingspan's own
 20 marketing literature, is it fair for me to say that, had
 21 you carried out the exercise we have just carried out,
 22 within the space of about eight minutes you would have
 23 concluded that K15 is not a material of limited
 24 combustibility as defined within Approved Document B?
 25 A. As per the Document B definition, yes, I would agree,

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1 yes.
 2 Q. Did you in truth carry out the exercise we have just
 3 carried out to establish whether or not this material
 4 meets the definition of non-combustibility in Approved
 5 Document B?
 6 A. I can't recall, but I believe I would have referred to
 7 these tables. I'm not sure my ... no, I can't recall
 8 the detailed process I went through. I think I was ...
 9 my judgement was perhaps skewed by the impression I had,
 10 or what I'd been told, that this product had already, by
 11 virtue of BR 135, been given the okay to be used over
 12 18 metres, so it was — but I didn't believe — in terms
 13 of the risk of the judgement, I didn't believe I was
 14 saying anything new, as I looked at it at that time.
 15 Q. Do you accept, Mr Jones, that had you simply followed
 16 the definitions within Approved Document B as we have
 17 just done, you would never have ended up writing in
 18 a certificate for K15, "This material can be considered
 19 a material of limited combustibility"?
 20 A. No, I would not. No. That's correct.
 21 Q. Do you think it is possible, in fact, that you simply
 22 did not know, in late 2008 and early 2009, that "limited
 23 combustibility" carried a specific and defined meaning?
 24 A. I think it is possible, yes, yes, that I didn't
 25 understand the significance of that.

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1 Q. Do you think it's possible that you were unaware that it
 2 had a definition within Approved Document B?
 3 A. I — because I can't recall how I referred to the
 4 document, all I can say is that I believe that I would
 5 have referred to those tables simply because they were
 6 referred to in paragraph 12.7, but I can't recall how
 7 I went about it in that respect, so I can't say for
 8 certain.
 9 MS TROUP: All right, Mr Jones, I'm going to pause you there
 10 for a moment.
 11 Just looking at the time, Mr Chairman, I wonder
 12 whether this might be an appropriate time for us to take
 13 a short break.
 14 SIR MARTIN MOORE-BICK: It might be, but how are you getting
 15 on?
 16 MS TROUP: I'm doing fine for time, and this is a good
 17 point, as good a point as any.
 18 SIR MARTIN MOORE-BICK: All right.
 19 Well, we'll take our mid-afternoon break a little
 20 earlier than usual, Mr Jones. We will come back at
 21 3.30, please. While we're having our break, please
 22 don't talk to anyone about your evidence or anything
 23 relating to it. All right?
 24 THE WITNESS: All right.
 25 SIR MARTIN MOORE-BICK: Very good. Thank you very much.

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1 We will see you at 3.30, then, please. Thank you
 2 very much.
 3 (3.12 pm)
 4 (A short break)
 5 (3.30 pm)
 6 SIR MARTIN MOORE-BICK: Welcome back, everyone. We're ready
 7 to continue hearing from Mr Jones.
 8 Mr Jones, I'll just check you're there and can see
 9 me and hear me?
 10 THE WITNESS: Yes, I can.
 11 SIR MARTIN MOORE-BICK: Very good. Ready to carry on?
 12 THE WITNESS: Yes.
 13 SIR MARTIN MOORE-BICK: Thank you very much.
 14 Well, when you're ready, Ms Troup.
 15 MS TROUP: Thank you.
 16 Mr Jones, I'm going to take you back now in time.
 17 Do you remember we looked at an email from
 18 November 2008 when you first became involved in this
 19 process, and Phil Harrison of the LABC sent to your
 20 line manager, Chris Jenner, a pdf document called "Type
 21 Approval Service Manual"?
 22 A. Yes.
 23 Q. If we can just go, please, to your second witness
 24 statement, which is {HBC00000051/4}, I want to look with
 25 you, please, at paragraph 14 where you're talking about

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1 that service manual. You say there:
 2 "I cannot categorically say whether I saw the
 3 Service Manual or not at the relevant time. I may well
 4 have seen it and a clue to this is that the £500
 5 'minimum' fee I quoted, to which I referred in an email
 6 to Phil Harrison (LABC) of 14 January 2009 [that's not
 7 the email I was just talking about but was a later one]
 8 ... seems to reflect section 4 of the guidance ..."
 9 Yes?
 10 A. Yes.
 11 Q. If we go down the page to paragraph 16, you say there:
 12 "The Manual confirms what I was told by LABC about
 13 accepting the content of the BBA Certificate without
 14 further interrogation ..."
 15 You refer there at the last line to section 3.3 of
 16 the manual, "Verification"; yes?
 17 A. Yes.
 18 Q. Let's go to that, please. It's at {HBC00000049/17}. We
 19 should find section 3.3 of the manual. Do you see the
 20 heading "Verification"?
 21 A. Yes.
 22 Q. We see there the following:
 23 "To ensure compliance, particularly in relation to
 24 some System and Product approvals, the scope of
 25 assessment will perforce be wide. It should embrace

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1 verification of the following."
 2 There are then a number of bullet points setting out
 3 certain checks or site visits or ongoing audits; yes?
 4 A. Yes.
 5 Q. If we look at the paragraph under those bullet points,
 6 we see this:
 7 "*** In the two circumstances marked above the
 8 holding and submission by the customer of authoritative
 9 independent third party verification, particularly if it
 10 is from a UKAS accredited source or other method
 11 recommended in Approved Document 7, is likely to
 12 indicate an acceptable level of satisfaction for our
 13 approval purposes and eliminate the need for any
 14 additional checking within that aspect."
 15 Is that the section to which you were referring?
 16 A. It is, yes, and it links to what I was told verbally by
 17 LABC when I spoke to them in that first telephone
 18 conversation.
 19 Q. Yes.
 20 Can you remember now whether you picked up the
 21 advice to accept whatever the BBA were saying at face
 22 value from your phone conversation, or whether you
 23 additionally read this document at the time it was sent
 24 to you, in late 2008? Or sent to Mr Jenner, I'm sorry.
 25 A. Yes. My recollection was being told this or discussing

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1 this during that telephone conversation. But this
 2 document was within Herefordshire Council's possession
 3 at that time, so it's possible that I'd also read this
 4 document at that time, and that might have prompted me
 5 to ask during the telephone conversation, you know,
 6 "What does this mean?"
 7 My memory is a little bit fuzzy on that. When
 8 I wrote my first witness statement I couldn't remember
 9 this document, although there are elements of it that
 10 I now remember being aware of.
 11 Q. Yes, all right.
 12 Can we go back, please, to your first witness
 13 statement —
 14 SIR MARTIN MOORE-BICK: Sorry to interrupt you, Ms Troup,
 15 I'm just curious, on the page that we're looking at, the
 16 passage you just referred us to with the double asterisk
 17 at the beginning suggests that there may be some
 18 circumstances marked with double asterisks. Where are
 19 they?
 20 MS TROUP: It does. I'm afraid we haven't been able to
 21 discover the answer to that question. There don't
 22 appear to be any particular sections marked with
 23 a double asterisk — oh, I'm being told, I think, that
 24 it's — ah. I think, Mr Chairman, that that is
 25 a reference to section 3.3 itself and to section 3.2

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1 above, because do you see that at the end of the list of
 2 bullet points there are two asterisks?
 3 SIR MARTIN MOORE-BICK: Oh, I see. That's meant to govern
 4 the whole of 3.3, is it?
 5 MS TROUP: It is, I think that's the answer.
 6 SIR MARTIN MOORE-BICK: I see. All right. Thank you very
 7 much.
 8 MS TROUP: Mr Jones, can we go back, please, to your first
 9 witness statement, which is {HBC00000029/41}. If we go,
 10 please, to the fourth paragraph there, starting, "I have
 11 no doubt" — no, in fact, if we go just above that, this
 12 is a section we have looked at already, starting "In
 13 terms of merit", do you see it?
 14 A. Yes.
 15 Q. And that's where you described your views at the time of
 16 Kingspan, "a world leader in insulation products with
 17 ... a reputation for integrity"; yes?
 18 A. Yes.
 19 Q. You say at the end of that section, in reference to
 20 their product literature:
 21 "... would have been viewed not with unconditional
 22 acceptance, but with a degree of trust."
 23 Going on, you say:
 24 "I have no doubt that in 2009 with the level of
 25 experience and knowledge I had, I would have tended

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1 towards trusting what they were telling me in their
 2 literature. After all, their products had been
 3 researched and developed by people with extensive
 4 specialist expertise in the field and the company was
 5 viewed as being one with integrity."

6 It's fair to say, is it, that because of your own
 7 level of experience and knowledge in 2009, you would not
 8 have been in a position to challenge Kingspan as to any
 9 of their assertions?

10 A. No, I would say that would be true. I didn't have the
 11 specialist knowledge or experience that would be
 12 necessary to be able to say, "Hang on, what you're
 13 saying doesn't sound right".

14 Q. The same is true, is it, in relation to anything
 15 asserted by the BBA?

16 A. Yes, that would be right.

17 Q. And although you have said there that their assertions
 18 would not be viewed with unconditional acceptance, would
 19 you agree that the overall effect of the project that
 20 you undertook seems to be that you did in fact
 21 unconditionally accept what you were being told, both by
 22 Kingspan and by the BBA?

23 A. Yes, certainly the BBA, and to some extent the Kingspan
 24 information as well, not least because the key points
 25 appeared to be supported by statements in the

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1 BBA certificate.

2 Q. Indeed, the two documents supported one another, did
 3 they not?

4 A. Yes.

5 Q. Yes.

6 A. They did, yes.

7 Q. All right.

8 I want to just look with you at some aspects of the
 9 evidence of some of the Kingspan witnesses.

10 If we can go, please, just briefly to the witness
 11 statement of Philip Heath, which is {KIN00020709/60}, if
 12 we look at paragraph 8.20, please, he says this:

13 "I cannot recall the LABC System Approval being
 14 issued as a draft by [Hereford]. However, we would have
 15 checked the document in any event and we would have
 16 identified any errors or any points of interpretation of
 17 the Building Regulations with which we did not agree.
 18 This did not mean that Kingspan assumed any
 19 responsibility for the accuracy of the certificate which
 20 remained an LABC document: we considered the LABC and
 21 the HCBCD [Hereford] to be experts and that the
 22 certification would reflect their understanding and
 23 interpretation of the Building Regulations and ADB."

24 So we can see there that where in a sense you are
 25 saying that you relied on the specialist expertise and

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1 research and integrity of Kingspan, at the same moment,
 2 Kingspan say they were relying on your expertise; do you
 3 see?

4 A. I do see, yes.

5 Q. I can see that Mr Heath says there that he cannot recall
 6 your system approval being issued as a draft. I think
 7 we know now that that was done and that you did send to
 8 Andrew Pack a draft of your certificate and summary.

9 Would you have expected Kingspan to pick up any
 10 inaccuracies or errors in that certificate and summary?

11 A. I would. That was the expertise that they were bringing
 12 to the exercise. They knew the product, they knew how
 13 it could be used. I mean, they, as a company, were
 14 advising the industry on how it should be used. So that
 15 was expertise they had. And I expected them to be
 16 honest and pick up any inaccuracies, that's why I sent
 17 it to them, not out of any naivety, but at that time
 18 I just wouldn't have imagined that a company in
 19 Kingspan's position would want to risk the reputational
 20 damage from knowingly marketing something with the wrong
 21 information.

22 Q. I see. All right.

23 Can we go now, please, to the witness statement of
 24 Ivor Meredith, which is at {KIN00022312/42}. If we
 25 look, please, at paragraph 92(d), it's in about the

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1 middle of the page, starting "If you took no action, why
 2 not". Just to set it in context, Mr Meredith was being
 3 asked there about this 2009 certificate and why Kingspan
 4 did not take any action in respect of its wording and
 5 technical content.

6 There he says this:

7 "We were paying experts to make opinions based on
 8 our product properties and their applicability in
 9 accordance with Building Regulations. We supplied the
 10 product data they would write the guidance. These
 11 bodies usually kept themselves in check and we were
 12 clutching at anything that would support the use of our
 13 products and very busy trying to balance all the needs
 14 of the companies[sic] business development therefore
 15 I believe it went unchecked properly by us. That being
 16 said the documents were very cheap compared to normal
 17 agreement certificates that could cost £20,000 per year
 18 compared to an initial £2,000 to produce the whole
 19 document."

20 Focusing really there on the middle section, were
 21 you aware at any stage of your involvement in this
 22 approval certificate that Kingspan were clutching at
 23 anything that would support the use of their products?

24 A. No, I had no indication of that in any of our
 25 conversations or emails. It was never even alluded to.

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1 Q. No.
 2 Were you aware that Kingspan say they were relying
 3 on your due diligence and expertise?
 4 A. No, I don't believe that to be accurate, because in
 5 terms of my involvement it was very much a collaborative
 6 exercise. They were providing expertise to the process.
 7 They — it wasn't all on Herefordshire or on LABC.
 8 Q. No, but it was surely more on Herefordshire and LABC
 9 than Kingspan, who are, after all, the product
 10 manufacturer. You and the LABC are producing
 11 an approval certificate.
 12 A. Yes, that is true, and it was my belief at the time that
 13 with my work then going to LABC for a further check,
 14 technical check, there was a robust procedure in place
 15 to counter that.
 16 Q. Yes. All right.
 17 I mean, the reality is, putting it brutally,
 18 I'm afraid, that no due diligence was carried out in
 19 respect of any of the assertions made in your type
 20 approval summary, was it?
 21 A. It doesn't appear to be the case, or certainly there
 22 were some matters there that should have been flagged up
 23 as of concern that weren't.
 24 Q. Yes.
 25 Can we go back, please, to your first witness

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1 statement at page 40 {HBC00000029/40}, and if we look at
 2 your response, please, to question 68, I want to look in
 3 particular at the final paragraph there, where you say:
 4 "I think a point to make here is that there was
 5 sometimes a great deal of pressure to consider and
 6 accept innovative solutions for clients which did not
 7 necessarily follow rigidly the approved documents.
 8 Private building control bodies were frequently known to
 9 exploit local authority stereotypes in their marketing —
 10 'go to the local authority and get tied up in red tape
 11 and rigid application of outdated approved document
 12 solutions; come to us and we'll give you innovative and
 13 free-thinking approaches to compliance'.
 14 You then go on to say:
 15 "This did lead to pressure on local authority
 16 surveyors to be open to new products and innovative
 17 solutions which the approved documents had yet to
 18 assimilate (and approved documents did tend to be
 19 several steps behind industry developments at any given
 20 time)."
 21 You then go on to say:
 22 "It was not uncommon for prospective clients to test
 23 our willingness to 'think outside the box' before
 24 placing their business with us. Once you go down that
 25 road, the next question is where you find the evidence

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1 to support these alternative approaches."
 2 I want to ask you about that because, given what you
 3 have said thus far in your evidence about the nature of
 4 Approved Document B or the approved documents in
 5 general, the training you had to think more widely and
 6 to think outside of the approved documents and to come
 7 up with alternative routes or definitions, was that in
 8 part because of this pressure that you've described
 9 here?
 10 A. I'm sorry, could you repeat the question?
 11 Q. Of course. I'm so sorry, I don't think I put it very
 12 well, or it was far too long.
 13 You told us earlier that when you were coming to
 14 form the judgement that K15 was a material of limited
 15 combustibility, you decided, in part as a result of your
 16 training, to step outside of the strict definitions
 17 within Approved Document B and to come up with
 18 an alternative; yes?
 19 A. Yes.
 20 Q. What I'm asking is whether that was in part related to
 21 this pressure that you've described in this section of
 22 the witness statement I've just read to you.
 23 A. Yes, it was. Now, I think the important thing —
 24 difference to point out is: this is a principle that
 25 applied in our building control business, as and when we

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1 were dealing with building control clients, which was
 2 our bread and butter, if you like, that's what we did.
 3 So as far as this sort of limited exercise with Kingspan
 4 goes, there was no incentive for me to try and, you
 5 know, please Kingspan or keep them happy in terms of
 6 future business, because there was no future business,
 7 Kingspan were not clients of ours, but I felt, when
 8 I was writing the statement, that perhaps it was
 9 important to point this out as the backdrop against
 10 which we worked, and it might perhaps explain why, when
 11 dealing with the Kingspan exercise, my — the way I went
 12 about it might have been influenced by the way I went
 13 about our normal building control activity.
 14 Q. I see. So more broadly, because of the pressures you
 15 have described here, to think outside the box and come
 16 up with innovative solutions, that had become a way of
 17 working which may have affected the way in which you
 18 approached this assessment; is that it?
 19 A. That's right, even though that incentive wouldn't have
 20 been there for Kingspan. It wouldn't have mattered to
 21 us whether we kept Kingspan happy or not, if I'm honest,
 22 because we weren't going to get repeat business, it
 23 wasn't part of what we did. But I'm sure that's the way
 24 we worked and that would have come out in the way
 25 I approached this exercise.

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1 Q. Why do you say there was no incentive for Hereford and
 2 you weren't going to get repeat business?
 3 A. Well, I mean, these type approvals, certainly the —
 4 well, the Kingspan ones were the only ones we dealt
 5 with, but they came along once in a blue moon, and the
 6 payment was inconsequential, really. £500 was about
 7 what we would have charged for building control on
 8 a kitchen extension. So it was — in terms of our
 9 income, it was neither here nor there, it was
 10 inconsequential.
 11 So really there was no incentive for us to do these
 12 type approvals, other than a sort of obligation to help
 13 LABC when they asked us to, and there was certainly no
 14 incentive to be overly generous to Kingspan, not
 15 deliberately, because, you know, this wasn't a source of
 16 income, this wasn't an income stream for us, they were
 17 small sums of money once in a blue moon, usually at a
 18 time when we were busy enough anyway and would rather
 19 not have the extra workload.
 20 Q. All right.
 21 I want to take you back, please, to the service
 22 manual we looked at earlier, {HBC00000049/16}, I think.
 23 If we look, please, at section 3.2,
 24 "Assessment/checking — level of service", we can see
 25 this in the opening paragraph:

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1 "It is vital for the Type Approval service that
 2 a high level of assessment is applied in order to secure
 3 user confidence, service credibility, and to avoid
 4 repetitive faults due to an initial oversight.
 5 Accordingly all Type Approval projects should be
 6 comprehensively checked in all respects, singular
 7 reliance upon a risk assessed acceptance or other form
 8 of exclusions from full checking, or reliance upon
 9 previous examples, should only form a limited,
 10 controlled and recorded part of any assessment process."
 11 Do you see that?
 12 A. Yes.
 13 Q. Do you know whether or not you read that at the time you
 14 were carrying out your assessment?
 15 A. I don't know. I was certainly aware of this second
 16 level of checking that LABC committed to, and my
 17 recollection is that this was discussed in the telephone
 18 conversation, but as with the discussion about the
 19 BBA certificates, I can't recall whether I'd read this
 20 section or whether it was just given to me verbally or
 21 both. But I was certainly aware of it.
 22 Q. Yes. So I know that this section goes on to discuss
 23 a second check and what is required in respect of
 24 a second check. Do you consider that the first
 25 paragraph of this section that I've just read to you is

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1 directed not to you, the author of the certificate and
 2 summary, but to LABC?
 3 A. I believe it to be, yes, because when we look at the
 4 bullet points which define the type of checking that
 5 might be carried out, that would have been LABC
 6 activity, not Herefordshire Council.
 7 Q. I see.
 8 What about the section towards the end of the first
 9 paragraph that I've just read to you, which says that
 10 they should be comprehensively checked in all respects,
 11 and then goes on to say that singular reliance upon
 12 previous examples should only form a limited, controlled
 13 and recorded part of any assessment process?
 14 If we think about that, it's fair, I think, for me
 15 to say that your type approval summary relied entirely
 16 on previous assertions which went unchecked by you; is
 17 that fair?
 18 A. Yes, in respect of the BBA certificate, yes.
 19 Q. Yes. But you considered that that paragraph and the
 20 advice in it as to the level of quality was not directed
 21 to you and not for you to consider; is that it?
 22 A. I read it to be a sort of robustness to the process that
 23 meant that no one local authority could issue a document
 24 without it being verified by other means, you know, to
 25 stop inaccurate information, you know, circulating in

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1 the wider industry.
 2 Q. I see.
 3 Do you consider that the work you carried out was of
 4 an adequate standard, Mr Jones?
 5 A. I think in terms of the scope of what I did, it matched
 6 what LABC had asked of us. But with hindsight, I don't
 7 believe that that scope was adequate. I don't believe
 8 it should have been done to that sort of level.
 9 Q. I see.
 10 A. And we've obviously looked at some of the work I did,
 11 and I appreciate that, because of my lack of experience,
 12 some of it was not what should have been written.
 13 Q. So given what you have said about the scope of the
 14 project as it was set out for you, what you're saying is
 15 that you did follow that, and you did carry out that
 16 work adequately within the parameters of that scope, but
 17 the scope itself essentially broke this from the start;
 18 is that fair?
 19 A. I believe so. When I look back at the scope that was
 20 asked of us, you know, £500 worth of work, I don't
 21 believe it was appropriate. The result of that sort of
 22 scope in terms of the certificate was always going to be
 23 very, very limited and barely scratched the surface, and
 24 I can see now with hindsight that, when you work to
 25 a very limited scope like that, there is a high risk

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1 that you don't dig down into the real meat of it, in
 2 which case then it begs the question: should it be done
 3 at all? As in you either do it fully or not at all.
 4 Q. Can we just go down, please, to section 3.5, I think
 5 it's on page 18 {HBC00000049/18}. This is about
 6 resources and competency:
 7 "LABC HQ and local authorities shall deploy
 8 sufficient experienced and qualified staff to Type
 9 Approval projects in order that every application is
 10 given a high level of professional assessment and
 11 decision-making."
 12 Then there are three bullet points above which the
 13 manual states:
 14 "If a local authority is faced with
 15 resource/ logistical problems in respect of any
 16 particular project or proposal it should either:
 17 "(i) seek to directly pass the project to another
 18 authority;
 19 "(ii) refer the matter to the Technical
 20 Co-ordinator ...
 21 "(iii) set up a joint working arrangement ..."
 22 As far as you are aware, was any consideration given
 23 at any stage, given your acknowledged lack of
 24 experience, to passing it to another authority or
 25 setting up a joint working arrangement or looking for

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1 any kind of formal help?
 2 A. I think the consideration was that initial — well,
 3 initial discussion between myself and Chris Jenner and
 4 between myself and LABC, where I was considering
 5 declining doing the work, not just for me but for
 6 Herefordshire Council, and saying, "Actually, I don't
 7 think we have that expertise", and that would be in line
 8 with what this section of the document is saying,
 9 actually do we have the expertise, but it was actually
 10 that conversation with LABC where the very limited scope
 11 was discussed where we concluded that: oh, okay, yes,
 12 for that sort of scope, yes, perhaps we do have the
 13 resources and the competency to go as far as that scope
 14 needs us to go.
 15 And perhaps, you know, in a different world, had all
 16 parties to that process been honest and open, then the
 17 result would have been very different, potentially. But
 18 that ... I think we did give consideration to it and it
 19 was the scope given to us by LABC that —
 20 Q. Yes.
 21 A. — that led us to go forward.
 22 Q. Referring back to what you said there about "had all
 23 parties been honest and open", can I ask you this: do
 24 you consider that you were misled during this process?
 25 A. Yes, I do.

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1 Q. By whom?
 2 A. I would say by Kingspan and by the BBA, although I don't
 3 know to what extent Kingspan influenced the content of
 4 the BBA certificate, you know, knowing now what was
 5 going on, but by both those documents, there were some
 6 very misleading statements, very misleading diagrams,
 7 that seem to me now to be designed quite deliberately to
 8 lead people down a certain interpretation. You know, it
 9 would have been so easy to include clarifications and
 10 caveats about what the testing actually related to, what
 11 the limitations on the use of the product in systems
 12 over 18 metres were. It would have been very, very easy
 13 to do, both in the Kingspan literature and in the
 14 BBA certificate, and it seems to me odd that there's
 15 almost a deliberate move not to include those
 16 clarifications and allow different interpretations by
 17 ordinary industry professionals like me, not specialists
 18 but just ordinary industry professionals.
 19 Q. Yes, thank you.
 20 You have spoken a little about the checks that you
 21 understood would be carried out at the LABC when you had
 22 finished your part in this assessment, but I think — we
 23 can go to it if we need to — in your first witness
 24 statement you actually say that you were not sure in
 25 2009 what arrangements were in place or what those

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1 checks would comprise; is that right?
 2 A. That's right. I knew there was a checking procedure and
 3 it's possible and likely that I saw that section of the
 4 manual, but of course that lists out quite a number of
 5 different options for checking, so I didn't know which
 6 of those LABC would choose to use. They had access to
 7 every local authority building control department in the
 8 country, including the urban ones, where high-rise
 9 buildings are the norm. They had access to technical
 10 consultants because LABC were marketing, I think, some
 11 technical consultancy services in the wider industry.
 12 Q. Yes.
 13 A. So they had various options to — that they could have
 14 used to take my report and get it checked, but I didn't
 15 know what they proposed to do, I just knew they were
 16 going to do some level of checking.
 17 Q. Something, yes, all right.
 18 You said to us earlier that that knowledge was
 19 significant to you and it provided you with some comfort
 20 when you carried out your work.
 21 Did you flag up to anyone at the LABC that you were
 22 relying on them to check very thoroughly the work you
 23 had done, or that you were expecting comments, or that
 24 you were concerned in any way?
 25 A. I believe I did. In that initial telephone

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1 conversation — —
 2 Q. I see.
 3 A. — there was an exchange where, you know, I went from,
 4 "Actually, I don't think we can do this" to "Oh, okay,
 5 if what you're saying is true about the scope and about
 6 the checking procedure, then maybe I can", and I think
 7 that in itself was an indication that the knowledge of
 8 the checking procedure was a key factor for us saying,
 9 "Yes, okay, we'll do it".
 10 Q. Yes. But you had no way of knowing, did you — I mean,
 11 I know it's difficult because we don't know who it was
 12 you spoke to initially at the LABC, but you had no way
 13 of knowing whether that person would have any
 14 involvement at all in the final checks. So I suppose
 15 what I'm asking is: did you consider at a later stage,
 16 perhaps when you sent in your draft document, flagging
 17 up to the LABC again that you didn't in fact have any
 18 experience or knowledge of these areas and that you were
 19 relying on them to check what you had done? Did you
 20 consider doing that?
 21 A. No, I don't think I did. I think I trusted LABC to do
 22 what we'd discussed. I think I was aware that
 23 Herefordshire Council was a known quantity to them in
 24 terms of, you know, the type of work and expertise we
 25 had, and I'd just — I knew that once I submitted the

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1 report to LABC, there was another process to go through,
 2 it was all in the manual and the process flowchart, so
 3 I think I trusted that they would do what was necessary.
 4 But I didn't pursue that with them again. I wish I had,
 5 if I'm honest, but no, I didn't.
 6 Q. All right.
 7 I want to look with you very briefly at another
 8 certificate for K15 issued by the LABC in 2013, and by
 9 that time it was called a registered details
 10 certificate, and I think you did have some involvement
 11 in it.
 12 If we can go to the certificate, please, it's at
 13 {KIN00009546}. So this is the certificate itself, and
 14 we can see on the left-hand side of the page that the
 15 date of issue is 28 August 2013; yes?
 16 A. Yes, I can see that.
 17 Q. That statement is signed off by Barry Turner on behalf
 18 of the LABC.
 19 If we go on, please, to the drawings and document
 20 list which came with this certificate, that is at
 21 {KIN00009547}.
 22 You tell us in your first witness statement —
 23 I don't think we need to go to it, but if you need to,
 24 we can do — that this assessment, this renewed
 25 certificate, the assessment was undertaken by

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1 Colin Davies at Hereford building control; is that
 2 right?
 3 A. That's right, yes.
 4 Q. I think at that time you were his line manager, were
 5 you?
 6 A. Yes.
 7 Q. Do you know how this assessment came to be the
 8 responsibility of Mr Davies rather than you? Was it
 9 just because of your respective positions at the time?
 10 A. Yes, it's because I was, as the manager of the
 11 department, doing far less technical assessment work at
 12 that time, but Colin was a fully practising, very
 13 competent building control officer, or senior
 14 building control officer, so I discussed with him, him
 15 taking the renewal.
 16 Q. Yes, all right.
 17 Did you review any part of this work before it went
 18 back to the LABC? Did you check —
 19 A. I think I did, I believe Colin brought it back to me.
 20 He knew of my previous involvement, so I think after
 21 he'd done his work — I think I talked it through with
 22 him before he did his assessment and probably did
 23 a review with him afterwards of what his findings were.
 24 Q. Can we just scroll down in this drawings and document
 25 list, please, to the next page {KIN00009547/2}. We see

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1 there it takes quite a different form than the one you
 2 prepared, doesn't it?
 3 A. Yes, yeah.
 4 Q. What I can tell you — we can go through it if we need
 5 to — is that this renewed certificate does not contain
 6 the words "K15 can be considered a material of limited
 7 combustibility" anywhere. All I wanted to ask you was
 8 whether you know why that particular wording was removed
 9 for this issue of the registered details certificate.
 10 A. I think the document I created in 2008/2009 —
 11 Q. Yes.
 12 A. — there was a version of that created for this renewal
 13 by Colin. He in fact took the original document and
 14 amended it, and the wording remains in that document, so
 15 it wasn't removed, it just doesn't appear in the part
 16 we're looking at now. In fact, the part we're looking
 17 at now was wording that was put forward by Kingspan.
 18 Q. It was. In fact, this was suggested word for word by
 19 Gareth Mills of Kingspan, wasn't it?
 20 A. Yes, it was, yes.
 21 Q. All right. But you say, do you, that there is another
 22 part of this document which you think does contain the
 23 words "material of limited combustibility"?
 24 A. Yes, as I say, it's the original document that I wrote
 25 in 2008 amended by Colin Davies.

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1 Q. I see. Do you think that change was made at the LABC?
 2 A. Which change now?
 3 Q. The addition of this appendix that we're looking at now.
 4 A. This appendix was added by LABC but in consultation with
 5 myself and Colin.
 6 Q. I see. All right. We might come back to that if we
 7 need to.
 8 I just want to look now, please, at some email
 9 correspondence from a little later in 2013. If we can
 10 go, please, to {LABC0005351/3}, which is the bottom of
 11 that email chain, if we can zoom in on the last email
 12 chain there, that is an email chain from David Ewing of
 13 the LABC to you, dated 19 December 2013. Do you see
 14 that?
 15 A. Yes, yeah.
 16 Q. I would like to take you to the section — it's a bit
 17 dense, I'm afraid — after "Hi Dave", if you go five
 18 lines down to the section starting, "I have also been
 19 approached", do you see that?
 20 A. Yes, yeah.
 21 Q. He says to you there:
 22 "I have also been approached by Celotex who have
 23 queried our interpretation of AD B in relation to the
 24 K15 product. I have no technical data behind our
 25 archive system so can't dig into it. Essentially the

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1 query is in relation to use of a PUR board in a position
 2 requiring fire resistance (particularly if it is used
 3 over 18m). AD B4 12.5—12.7 and definition of limited
 4 combustibility.
 5 "Wondered if there was any testing undertaken to
 6 demonstrate the external boarding protected the internal
 7 core of the board or any background on the research
 8 process undertaken. I appreciate this may have been
 9 some time ago as I think it was originally a LANTAC
 10 certificate."
 11 I think that's a little bit confused in terms of its
 12 wording, but would you agree with me that essentially
 13 what Mr Ewing is saying there is that Celotex are
 14 questioning the terms of the original certificate from
 15 2009 in relation to limited combustibility?
 16 A. That does seem to be how it's worded, yes, yeah.
 17 Q. All right.
 18 So can we go up, please, to your reply which comes
 19 the next day. So if we scroll up. I think your email
 20 is quite a long one, so page 1 {LABC0005351/1}. You say
 21 there:
 22 "Hi David
 23 "I'm not sure what specific issues have been raised
 24 by Celotex, but below are some extracts relevant to the
 25 fire performance and testing of K15.

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1 "Firstly from the BBA certificate ..."
 2 Then you have copied and pasted section 7,
 3 "Behaviour in relation to fire", from the
 4 BBA certificate into your email. Yes?
 5 A. Yes.
 6 Q. All right.
 7 Let's scroll down, please, to the next section of
 8 this page.
 9 At the very bottom, in the smaller blue writing,
 10 I think this is you again, you say:
 11 "Followed by an extract from Kingspan's own
 12 technical literature ..."
 13 So now if we go over to page 2 {LABC0005351/2},
 14 please, that is — it's quite difficult to see — the
 15 section we looked at earlier, isn't it, from Kingspan's
 16 marketing literature?
 17 A. Yes.
 18 Q. Containing the phrase at the end of it "and is therefore
 19 acceptable for use above 18 metres"; yes?
 20 A. Yes, yes.
 21 Q. Just below that, in blue, this is you again:
 22 "And these from our internal assessment ..."
 23 If we can scroll down again, please, here you have
 24 copied and pasted sections from the type approval
 25 summary, the relevant sections, requirement B and B4,

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1 external fire spread; yes?
 2 A. Yes.
 3 Q. So scrolling down a little more, please, to the bottom
 4 of that page, you say at the bottom there in blue:
 5 "Essentially as the board is described as Class 0,
 6 it can be termed a 'material of limited combustibility'
 7 and so in terms of the relevant part of Doc B it is
 8 suitable for use within the wall construction even at
 9 heights over 18m."
 10 Do you remember writing that, Mr Jones?
 11 A. I don't remember writing that. That seems to be a real
 12 simplification. I mean, I've sent all the background to
 13 the judgement, but I haven't — it's a very simplistic
 14 way of writing it. I can't recall that.
 15 Q. I'm not sure it's a simplification; it's inaccurate,
 16 isn't it?
 17 A. Yes, yes.
 18 Q. The reason I wanted to ask you about this is because in
 19 your evidence earlier you seemed to be very clear that
 20 many years before this, in 2009, you were very clear as
 21 to the difference between class 0 and limited
 22 combustibility and how those things related to one
 23 another. In fact, you went so far as to say that — you
 24 described the confusion in industry about that matter,
 25 confirmed that you had no confusion in your mind on that

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1 issue, and in fact I think you said that you were
 2 required to understand it well enough to correct the
 3 misunderstandings of others. Is that right?
 4 A. Yes, and I still believe that to be the case, yes, yes.
 5 Q. So how did you come at the end of 2013, in response to
 6 a request from the LABC for an explanation as to how
 7 your type approval certificate said what it said, to be
 8 saying this to David Ewing of the LABC? Can you explain
 9 that?
 10 A. I can't explain that, other than that it's wrong.
 11 Q. Do you think it might be the case, Mr Jones, that you
 12 were not quite so clear in your own mind in 2009, or
 13 even in 2013, as to what class 0 and/or limited
 14 combustibility might have meant?
 15 A. I believe that I was clear on it. It was quite
 16 a fundamental requirement, and I don't think for me
 17 there was the sort of ambiguity that that sentence
 18 suggests.
 19 Q. No, but equally that sentence is very clear. Do you
 20 have any idea how you can have come to write that? It's
 21 just an aberration, is it?
 22 A. It is. I can only say it had been so long since I'd
 23 done — had any detailed involvement in this that I've
 24 written a very simplistic account of how I arrived at
 25 the conclusions.

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1 Q. Well, again, forgive me, but it's not simplistic, it's
 2 just wrong, isn't it?
 3 A. It is wrong, yes.
 4 Q. Yes, all right.
 5 Do you know whether David Ewing went back to Celotex
 6 with that explanation? Did you hear any more about it?
 7 A. I don't believe I did, no.
 8 Q. All right.
 9 Other than this, and this series of emails, were you
 10 at any stage made aware of any concerns or complaints
 11 from any individual or organisation in relation either
 12 to the 2009 certificate for K15 or to the 2013
 13 certificate for K15?
 14 A. I can't recall being made aware of any, no.
 15 MS TROUP: All right.
 16 Mr Jones, at this stage I can tell you that I've
 17 come to the end of my prepared questions for you, but
 18 I'll hand back over to the Chairman, because we need now
 19 to take another short pause.
 20 SIR MARTIN MOORE—BICK: Yes, thank you very much.
 21 Well, Mr Jones, at this stage we have a short break
 22 so counsel can check that there aren't any questions
 23 that she's omitted to ask, and also to allow other
 24 people following the Inquiry to suggest possible further
 25 questions.

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1 So we'll have a break until 4.30, and at that point
 2 we'll find out whether there are any more questions for
 3 you. All right?
 4 THE WITNESS: All right.
 5 SIR MARTIN MOORE—BICK: The usual instruction: don't talk to
 6 anyone about your evidence, please, during the break.
 7 All right?
 8 See you at 4.30, then. Thank you.
 9 THE WITNESS: All right. Thank you.
 10 (4.17 pm)
 11 (A short break)
 12 (4.35 pm)
 13 SIR MARTIN MOORE—BICK: Welcome back, everyone. We will now
 14 see if there are any further questions for Mr Jones.
 15 Mr Jones, just to check up, can you see me and hear
 16 me clearly?
 17 THE WITNESS: Yes, I can.
 18 SIR MARTIN MOORE—BICK: Very good. We'll now see whether
 19 Ms Troup does have any further questions for you.
 20 Ms Troup?
 21 MS TROUP: Yes, just one further question, Mr Jones, and
 22 it's this: we have been through a great deal of evidence
 23 in just one day and we've discussed a number of issues,
 24 and I want to ask you this: looking back over all of
 25 that, is there anything that you would have done

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1 differently?
 2 A. From where I now stand, the thing I would have done
 3 differently was go with my first instinct right at the
 4 very start and say, "I don't believe we're equipped to
 5 do this exercise".
 6 MS TROUP: All right, thank you.
 7 THE WITNESS: Thank you.
 8 SIR MARTIN MOORE—BICK: Well, Mr Jones, it's right that
 9 I should thank you on behalf of not only myself but the
 10 whole panel for making yourself available today to give
 11 us your evidence. I would like you to know that it's
 12 been extremely valuable to us to hear what you have to
 13 tell us, so we are very grateful to you for coming along
 14 to do that, and that is all the questions we have for
 15 you. So you are now, as it were, free to go about your
 16 business.
 17 Thank you very much indeed.
 18 THE WITNESS: Thank you.
 19 (The witness withdrew)
 20 SIR MARTIN MOORE—BICK: That's the end of the hearing for
 21 today. We will resume at 10 o'clock on Monday with
 22 another witness.
 23 (4.40 pm)
 24 (The hearing adjourned until 10 am
 25 on Monday, 8 March 2021)

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