

OPUS 2

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Grenfell Tower Inquiry

Day 84

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1 Tuesday, 8 December 2020
 2 (10.00 am)
 3 SIR MARTIN MOORE-BICK: Good morning, everyone. Welcome to
 4 today's hearing. Today we're going to continue hearing
 5 evidence from Mr Pargeter of Kingspan.
 6 So would you ask Mr Pargeter to come back in,
 7 please.
 8 MR ADRIAN WESTLEY PARGETER (continued)
 9 SIR MARTIN MOORE-BICK: Good morning, Mr Pargeter.
 10 THE WITNESS: Good morning.
 11 SIR MARTIN MOORE-BICK: Ready to carry on?
 12 THE WITNESS: Yes.
 13 SIR MARTIN MOORE-BICK: Thank you.
 14 Yes, Mr Millett.
 15 Questions from COUNSEL TO THE INQUIRY (continued)
 16 MR MILLETT: Good morning, Mr Chairman. Good morning,
 17 members of the panel.
 18 Good morning, Mr Pargeter.
 19 Can I go back to some evidence that you gave late
 20 yesterday afternoon. You were telling us about 13785
 21 tests.
 22 A. Yes.
 23 Q. You said -- and I'll try and summarise it -- that the
 24 13785 test proves a difference at a much lower output of
 25 fire, and you said that the more fire output you put on

1

1 it, the less likely there is going to be any type of
 2 difference, particularly from a facer which is a 20th of
 3 a millimetre thick in aluminium. I'm sorry I can't at
 4 the moment put my hand on the transcript, but that was
 5 the thrust of your evidence yesterday.
 6 A. That's correct.
 7 Q. As a matter of fact, to your knowledge, did Kingspan
 8 ever obtain an independent expert opinion to support
 9 what you have told us?
 10 A. Not that I'm aware, no.
 11 Q. Because we found no evidence in the record that the
 12 opinion that you expressed yesterday afternoon in your
 13 evidence was commonly held within the technical team; is
 14 that correct?
 15 A. No, I don't think so.
 16 Q. Well, who in the technical team to your knowledge at the
 17 time held the same opinion that you expressed to us in
 18 evidence yesterday afternoon about the 13785 tests?
 19 A. At the time the 13785 tests were done?
 20 Q. At any time between 2014 and 2019.
 21 A. I think Adam Heath may have been of the same opinion,
 22 after seeing the 13785 tests, for example.
 23 Q. Do you know of any documents where this opinion was
 24 recorded?
 25 A. No, just in the test reports that we've got.

2

1 Q. Has Kingspan ever performed a like-for-like properly
 2 instrumented BS 8414 test where the only parameter
 3 varied between two otherwise identical tests was the
 4 thickness of the foil facer or the presence of
 5 perforations in the foil facer?
 6 A. No, not that I'm aware.
 7 Q. Now, I want to turn back to where we were yesterday when
 8 we stopped, and I want to ask you about the 2014 test,
 9 by which I mean the one in July 2014.
 10 A. Yes.
 11 Q. Can we go, then, first, to your third witness statement
 12 at {KIN00022610/56}, and let's look at the middle of
 13 page 56, where we can see the Inquiry's question 85(a).
 14 Question 85 relates back to paragraph 4.42 of your
 15 second witness statement, where you say that the
 16 July 2014 test may have used K15 produced for
 17 a development project.
 18 The question under (a) is:
 19 "When, specifically, did it come to your knowledge
 20 that:
 21 "i. there was some confusion as to the insulation
 22 board tested?"
 23 And your response to that appears on page 56 just
 24 below that at paragraph 7.16. You say:
 25 "In October/November 2014. As explained in

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1 paragraph 45 above, at this time I was Product
 2 Development Manager and I was involved in discussions
 3 about this test because it was relevant to our research
 4 and development work looking at a low lambda version of
 5 K15. I was not involved in discussions or decisions to
 6 use this test to support the use of standard K15 in
 7 buildings over 18 metres and I only made the connection
 8 that the test I was involved in from a product
 9 development perspective in July 2014 was being used to
 10 support the use of standard K15 when it was raised by
 11 Insulation UK's solicitors in early 2019 during their
 12 disclosure exercise for the purposes of the Grenfell
 13 Tower Inquiry."
 14 Now, just to be completely clear, are you saying
 15 here that in July 2014, because of your involvement in
 16 the development of the low lambda product at that time,
 17 you knew at that time that the product being tested in
 18 that test was not standard K15 but a development
 19 product?
 20 A. Yes, that's what I understood that test was.
 21 Q. Yes, and you're saying also, again to be clear, that you
 22 only discovered that the July 2014 test was being used
 23 to support the use of standard K15 in early 2019 during
 24 the disclosure exercise?
 25 A. That's correct.

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1 Q. Right. You're absolutely sure about that, are you?
 2 A. Yes.
 3 Q. Right.
 4 Now, let's continue. At the bottom of page 56,
 5 I showed you the paragraph, I just want to identify the
 6 precise sentence I want to ask you about. You say in
 7 the fourth line:
 8 "I was not involved in discussions or decisions to
 9 use this test to support the use of standard K15 in
 10 buildings over 18 metres ..."
 11 Now, are you saying that there were indeed
 12 discussions and decisions on that topic?
 13 A. Well, there must have been, because we did rely on that
 14 test in the literature.
 15 Q. Indeed. Do you know who was involved in those
 16 discussions and decisions?
 17 A. At the time, I thought it probably would have been Ivor
 18 using that test to support it, and providing it to the
 19 marketing teams for doing the routes to compliance
 20 document.
 21 Q. When you say, "At the time, I thought it probably would
 22 have been Ivor", at what time?
 23 A. At the time when we understood that that test was being
 24 used. So I understood then in February 2019, we
 25 confirmed that that was that test that was being relied

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1 on which was in the literature.
 2 Q. Right. So in 2019, when you say you first discovered
 3 this, you thought, looking back on it, it would have
 4 been Ivor?
 5 A. Yes.
 6 Q. I see. Who else?
 7 A. I didn't think anyone else at the time.
 8 Q. So did you think in February 2019 that Ivor Meredith
 9 would have been a sole actor in using the July 2014 test
 10 in K15's marketing literature for standard K15?
 11 A. Potentially, yes, yes.
 12 Q. Really? A sole actor, solely responsible?
 13 A. I think he would have provided the report to the teams
 14 in the marketing teams to use in the literature.
 15 Q. Did you, in February 2019, investigate that question and
 16 find out whether he really was a sole actor, as you
 17 suspected, or whether there was anybody else involved?
 18 A. I looked back at it, because obviously it happened on my
 19 watch, which I was really disappointed about, and tried
 20 to work out where that error had occurred. I looked at
 21 the report; the report referenced it as K15 and not as
 22 a development product or a low lambda product.
 23 Q. Which report, the July report?
 24 A. The test report, yes. And then just looking back at the
 25 documents, I thought that was probably the likely case.

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1 Q. Did you look at any of the email chains and
 2 correspondence, communications internally, on the
 3 subject?
 4 A. Not at that point, I don't --
 5 Q. So you wouldn't have been able to tell simply by looking
 6 at the test report who within your organisation was
 7 involved, such as, for example, Tony Millichap?
 8 A. Yes. Correct.
 9 Q. I'm right, aren't I?
 10 A. Yes.
 11 Q. So when you suspected Ivor Meredith of being a sole
 12 actor, you didn't think about Tony Millichap?
 13 A. No, I didn't.
 14 Q. And you didn't think about anybody else, for example
 15 Richard Burnley, the UK managing director?
 16 A. No, I didn't.
 17 Q. Or Peter Wilson, the UK divisional director?
 18 A. No.
 19 Q. Why is that?
 20 A. I just didn't think they would have understood that
 21 detail.
 22 Q. Really? Okay.
 23 Now, I just want to read you or show you a part of
 24 Tony Millichap's evidence about knowledge of the
 25 July 2014 test being used to market standard K15. It's

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1 {Day82/76:3} onwards. It goes over the page to page 77.
 2 Just as Ms Grange was fair to Mr Millichap in giving him
 3 a lot of run-up to it, I'll do the same for you. If you
 4 go to page 76, line 3, she puts to Mr Millichap this:
 5 "Question: Now, in fairness to you, we want to put
 6 this to you: were you saying that you shouldn't have
 7 a marketing campaign because it wasn't a compelling
 8 story?
 9 "Answer: I had pointed out that if we were moving
 10 to that product, which was fully the intention, then
 11 obviously that product needs to be identified as
 12 a different product.
 13 "Question: Who had you pointed that out to?
 14 "Answer: I've seen that in a couple of --
 15 definitely the fire focus group, I think predominantly,
 16 so the senior team responsible.
 17 "Question: Right.
 18 "Did any of these men know that the test that had
 19 been carried out was actually on a research and
 20 development product, do you know? How widely was that
 21 information known within Kingspan?
 22 "Answer: Yes, I believe it would have been.
 23 I mean, Richard Bromwich was the most senior
 24 representing the sales efforts. He will have been kept
 25 abreast of those developments. I don't recall, but

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1 I believe he would have been invited to the fire focus
 2 group. I'm not sure if he attended.
 3 "Question: Right. What about Adrian Pargeter, did
 4 he know that it was a trial product that was different
 5 to that that you were selling?
 6 "Answer: Yes, I believe it was common knowledge.
 7 "Question: Did you disagree in the event with the
 8 plan to promote and market standard K15 on the basis of
 9 the test that you knew not to have been on that K15?
 10 "Answer: It's difficult to recall the exact
 11 chronology."
 12 Then it goes on.
 13 Do you agree with Mr Millichap's evidence that it
 14 was common knowledge that a test on an R&D product was
 15 being used to market standard K15?
 16 A. I don't think it was common knowledge.
 17 Q. Do you dispute what Mr Millichap says, that you
 18 personally knew that fact?
 19 A. I didn't understand that that test was what was being
 20 represented in the literature.
 21 Q. So you dispute what he says in his evidence, do you?
 22 A. I do, yes.
 23 Q. Now, let's look at some documents.
 24 Your role, as you told us, in marketing and
 25 promotion of K15 began in November 2014, didn't it?

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1 A. Yes.
 2 Q. You told us that in your statement, your second
 3 statement, at paragraph 4.17 {KIN00020824/22}.
 4 You've told us that you were unaware that the
 5 July 2014 test that you had been involved in from
 6 a product development point of view had been used to
 7 market standard K15 until you discovered that in early
 8 2019.
 9 So does it follow from that -- I think it must do --
 10 that at no time between your taking over your role as
 11 marketing and promotion head/chief in 2014 and early
 12 2019, in all those years, did you discover this fact?
 13 A. No, I didn't.
 14 Q. Let's examine that a little bit more closely still.
 15 Let's start by looking at the routes to compliance
 16 fire safety technical bulletin released in August 2015.
 17 This is at {KIN00000086}. Let's have that up. I want
 18 to have that up just to put it on the screen for the
 19 moment. That is the document dated August 2015, and at
 20 that time you were by then head of technical and
 21 marketing, so you had both roles.
 22 A. Correct.
 23 Q. Yes.
 24 Before we go deeper into the document, can I take
 25 you to your second witness statement, please, at page 23

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1 {KIN00020824/23}, and let's look together at
 2 paragraph 4.19 there in the middle of the page. You say
 3 there:
 4 "One of the main promotional documents created since
 5 2014 was the guide entitled 'Routes to Compliance: Fire
 6 Safety: for facades incorporating Kingspan Kooltherm K15
 7 Rainscreen Board on Buildings with a habitable storey
 8 18m, or greater, above ground level', the first issue of
 9 which was published in August 2015. As explained at
 10 paragraph 4.26(d) of my First Witness Statement, this
 11 document aimed to explain the various routes available
 12 to achieve compliance including Option B under the ADB
 13 and the use of desktop studies."
 14 Just so that everyone else is clear, option B,
 15 of course, is the alternative route to compliance, where
 16 you don't have a non-combustible product or a product of
 17 limited combustibility.
 18 A. That's correct.
 19 Q. Yes.
 20 Let's then look at paragraph 4.21 at the bottom.
 21 You say this:
 22 "My role in preparing the technical content of the
 23 first issue of this bulletin was limited as by the time
 24 I took over as Head of Technical in May 2015 most of the
 25 drafting and compilation of relevant test data had

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1 already been completed by Ivor Meredith (Technical
 2 Project Manager) and Tony Millichap (Head of
 3 Technical)."
 4 You see that?
 5 A. Yes.
 6 Q. Then it goes on to say that you worked with the team to
 7 ensure the document:
 8 "... reflected the guidance provided in BCATGN18
 9 [Technical Guidance Note 18] and also became involved in
 10 the reviewing of drafts of the Route to Compliance
 11 document. The first issue of the Routes to Compliance
 12 document was signed off by me from a marketing
 13 perspective, following reviews by John Garbutt as he was
 14 the Divisional Marketing Director for Kingspan as this
 15 was a significant piece of literature. It was also sent
 16 to Richard Bromwich (Commercial Director) and
 17 Richard Burnley (UK Managing Director) on 24 July 2015
 18 before final sign off."
 19 Now, that's a long bit of background, but I want to
 20 examine it a little bit with you.
 21 Let's look at the document, {KIN00000086}. This is
 22 the final form as issued, but can we take it that this
 23 is also the document you signed off before it went to
 24 Mr Bromwich and Mr Burnley?
 25 A. Yes, that's correct.

12

1 Q. I take it that the changes they made were either minimal
2 or none at all.

3 A. If any, yes.

4 Q. Can we look at page 17 {KIN00000086/17}. We can see the
5 heading at the top of the page, "Appendix B, Large Scale
6 Test Data", and we looked at this yesterday. Under it,
7 it says:

8 "Build-ups incorporating Kingspan Kooltherm K15
9 Rainscreen Board successfully tested to BS 8414-1:2002
10 and BS 8414-2:2005, in accordance with the performance
11 criteria set out in BR 135."

12 Now, the first build-up we can see, as we saw
13 yesterday, is on the left-hand side of those diagrams.
14 That's the 2005 test, isn't it?

15 A. Yes.

16 Q. And I think you agreed yesterday that that in fact is
17 a misleading representation there, because in fact the
18 K15 in that test was not K15 as sold in August 2015.
19 You accepted that that was misleading in that respect.

20 A. I accepted that fact --

21 Q. That fact, yes.

22 A. -- was misleading.

23 Q. Looking at the third build-up in the bottom right-hand
24 corner, we can see a terracotta tile cladding with
25 a steel frame with report number 291642. That was

13

1 a reference, wasn't it, to the BRE classification report
2 for the July 2014 test?

3 A. I believe so, yes.

4 Q. If you go to the diagram above it on page 17, you can
5 see that the K15 is said to be "80mm Kingspan Kooltherm
6 K15 Rainscreen Board". But again, it wasn't, was it?
7 It wasn't K15; it was the development product.

8 A. That's correct.

9 Q. So in that respect also, this technical bulletin was
10 false and misleading?

11 A. That was inaccurate.

12 Q. Well, it was false and misleading.

13 A. It was definitely inaccurate. I wouldn't say it was
14 misleading, but it was inaccurate.

15 Q. Well, you say it was inaccurate but not false and
16 misleading. I don't want to spend hours debating the
17 semantics of fraud with you, but I just want to
18 understand really how you come to that distinction.

19 Let's break it down.

20 Do you agree that the statement, "80mm Kingspan
21 Kooltherm K15", was erroneous?

22 A. Yes, I agree.

23 Q. Do you agree that anybody reading that would fall into
24 error, because they would think it was K15 as being sold
25 when in fact it wasn't?

14

1 A. Yes, I'd agree.

2 Q. Do you accept that there would thereby be misled?

3 A. Yes, I'd accept that.

4 Q. So you agree with me that it's a false statement which
5 would be apt to mislead somebody who didn't know the
6 truth?

7 A. Yes, I agree.

8 Q. Thank you.

9 Now, given that you knew, in July 2014, because of
10 your involvement in the development of the low lambda
11 product, that the product being tested was not standard
12 K15, you must have known when you signed off on this
13 document on 24 July 2014 that this statement here, which
14 I've just shown you, was false and misleading.

15 A. No, I didn't make the connection that that was that test
16 at the time.

17 Q. Did you read this document when you signed it off?

18 A. Yes, I did.

19 Q. Did you read page 17, appendix B, when you signed it
20 off?

21 A. Yes, I did.

22 Q. Did you look at the diagrams on that page when you
23 signed it off?

24 A. Yes, I did.

25 Q. Can you explain how you didn't spot, when you read the

15

1 third diagram on that page, when you signed it off, the
2 fact that it stated that Kingspan K15 rainscreen board
3 was used in the test for report 291642?

4 A. I just assumed that that was a test on the standard
5 product and not the development test we'd done
6 earlier --

7 Q. I don't understand that.

8 A. -- incorrectly.

9 Q. You knew as at July 2014 that the test that you had done
10 at that time, which resulted in that report, which has
11 a number there, was done on a research and development
12 product; you have told us that a number of times.

13 A. Yes, I did, but I didn't make that connection for this
14 report.

15 Q. Explain.

16 A. I just assumed this was done on the standard product,
17 this particular one, and I didn't make the connection
18 that that test was the development test, and that was
19 an error.

20 Q. What test did you think it was?

21 A. I just thought it was a standard product.

22 Q. But there had only been one successful 8414 test on the
23 standard product, and that was the 2005 test, which is
24 the subject of the diagram on the top left-hand side,
25 isn't it?

16

1 A. Yes.
 2 Q. So you would have realised, looking at this, that this
 3 test was a different test?
 4 A. I didn't realise it.
 5 Q. I can't understand that.
 6 A. It was an error on my part.
 7 Q. Well, it's quite a fundamental error, isn't it?
 8 A. I just assumed it was a standard test.
 9 Q. Well, you say you just assumed it was a standard test,
 10 and I'm sorry to press this a little bit, but I'm afraid
 11 that's just not really a credible answer, and I would
 12 just like you to explain how you made the assumption,
 13 given that you had read this document thoroughly --
 14 well, maybe you didn't. Did you read it thoroughly?
 15 A. I think I did, yes.
 16 Q. Yes, I mean, you were head, and this was an important
 17 document that had gone through a number of drafts and
 18 you were sending it to Burnley and Bromwich for their
 19 final sign-off.
 20 A. That's correct.
 21 Q. And it was going to the market as a positive piece of
 22 advice about how safely to apply K15 above 18 metres, so
 23 I'm going to assume, unless you tell me otherwise, that
 24 you did read it thoroughly.
 25 Having read it thoroughly, you need to explain to us

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1 how it was that you assumed that report number 291642
 2 was not the report for the test done in July 2014 on
 3 a research and development product?
 4 A. I think I just relied on the data that was provided and
 5 I didn't look into that element of it deeply.
 6 Q. It stands out from the page, though, that here are at
 7 least two successful 8414 tests, forget the one at the
 8 top right-hand corner. You must have known at the time
 9 that there was only one successful 8414 test in relation
 10 to standard K15, and that was in 2005, and even that
 11 wasn't in relation to standard K15.
 12 A. No, I didn't make that connection.
 13 Q. Right.
 14 Let's look a little bit more into the detail.
 15 Can we go to an email chain a little earlier in
 16 2005, this is May, {NHB00001109}. This is an email at
 17 the top from Ivor Meredith to various members of the
 18 NHBC and Kingspan, including you, Mr Pargeter. Can you
 19 see that you're copied in on it?
 20 A. Yes.
 21 Q. It goes to Graham Perrior of the NHBC, and it says:
 22 "Hi Graham,
 23 "We would welcome a chance to catch up and as
 24 discussed previously and would be happy to extend the
 25 invitation for you to visit our production facilities in

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1 Pembridge, Herefordshire ..."
 2 Then in the next line, he says:
 3 "This would also be a good opportunity for you to
 4 meet our new Head of Technical Adrian Pargeter."
 5 Just pausing there, when you received this email, as
 6 a copied party, did you read it?
 7 A. I believe I did, yes.
 8 Q. Then you can see that there is a set, towards the bottom
 9 of page 1 and over to page 2, of questions and answers,
 10 and the answers are in red from Mr Meredith to questions
 11 which had been posed by the NHBC.
 12 I just want to look at point 2, over the page on
 13 page 2 {NHB00001109/2}, please, with you. It says
 14 there:
 15 "During a previous meeting it was mentioned that
 16 a BR135 Certificate exists for the Terracotta fire test.
 17 It would be most helpful if you could send a copy of
 18 this certificate?"
 19 And it says:
 20 "Attached to previous correspondence as sent on the
 21 28th."
 22 Now, given that this is May 2015, it's clear, isn't
 23 it, that Kingspan had only undertaken one large-scale
 24 fire test using a terracotta rainscreen for which it had
 25 a test report as at this date, and that was

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1 the July 2014 test?
 2 A. That's my understanding now, yes.
 3 Q. Well, it's your understanding now, you say; why was it
 4 not your understanding when you received this email?
 5 A. Because I don't think I was 100% sure just what tests
 6 had been done. I was aware that that test on the
 7 terracotta for the development test had been done, but
 8 I don't think I was fully aware of other tests that may
 9 have been done.
 10 Q. But you were head of technical, at this stage.
 11 A. Just, yes, just taking over.
 12 Q. Just, admittedly, I agree, it's the end of May, and
 13 presumably you had only just stepped into the role at
 14 that stage, but were you not interested to get a grip on
 15 precisely what tests had been done on K15?
 16 A. I think, yes, I would have been.
 17 Q. And you would no doubt in that role, being new to the
 18 role and presumably being quite keen to carry it out to
 19 the best of your ability, have discovered that the test
 20 being referred to was indeed the test done in July 2014.
 21 A. I didn't make that connection, no.
 22 Q. You didn't make that connection? What connection did
 23 you make?
 24 What did you think Mr Meredith was talking about
 25 when he refers to a BR 135 certificate for the

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1 terracotta test which had been attached to previous
 2 correspondence?
 3 A. I just assumed he was talking about a test on the
 4 standard product.
 5 Q. But why?
 6 A. Because I wasn't fully aware of what we had and hadn't
 7 done at that stage.
 8 Q. Were you not interested to see it?
 9 A. I can't say that I did.
 10 Q. That would have been a pretty slack approach for
 11 somebody new to a senior job. Was that how you normally
 12 operated?
 13 A. No. I --
 14 Q. No.
 15 Now, he says, "Attached to previous correspondence
 16 as sent on the 28th".
 17 If you scroll down two emails in the chain -- so
 18 this is the chain that comes to you -- to page 3
 19 {NHB00001109/3}, please, you can see that here is the
 20 email which Ivor Meredith is referring to, which he
 21 sends to Graham Perrior and Ian Davis at the NHBC,
 22 copied to others at the NHBC:
 23 "We trust all is well."
 24 "Please find attached revised BS 8414-2 Report which
 25 includes 12mm CP board Sheathing and relevant BR 135

21

1 Classification . We will follow with an update and
 2 address your questions below."
 3 Now, the Kingspan document that we have been given
 4 doesn't have the attachment, but the corresponding NHBC
 5 document, the incoming email to them, does. I just want
 6 to show you that. It's {NHB00001086}, just so that you
 7 can be clear about what it is that's being sent. That's
 8 the email from NHBC's disclosure.
 9 If you go to {NHB00001087}, you can see the
 10 attachment, and there it is, and it is BR 135
 11 classification report number 291642. That's the number
 12 for the classification report that we saw in the bottom
 13 right-hand corner diagram in the August routes to
 14 compliance document, isn't it?
 15 A. Yes.
 16 Q. And it is clear from this that the issue date is
 17 14 April 2015, and that's issue 2, and if you go down to
 18 page 2, you can see the test date, just so that we're
 19 clear. My fault, that's the date of the report. But
 20 the date of the actual test is on page 14.
 21 (Pause)
 22 I have misled you by accident. The test isn't
 23 actually on there.
 24 But do you, looking at that, recognise this document
 25 at all?

22

1 A. The classification report, yes.
 2 Q. Perhaps we can get there simply by looking at page 6
 3 {NHB00001087/6}. If you look at the system, the
 4 "Description of product" under paragraph 2.2, you can
 5 see the system as built comprises the system that was
 6 tested in July 2014, doesn't it?
 7 A. Yes, it does.
 8 Q. So although I'm unable, I think, to provide the precise
 9 date to you as a simple means of identifying what this
 10 is about, nonetheless I think you accept that you were
 11 copied in, it looks like, on an email chain in late
 12 May 2015 which identifies the BRE test for the July 2014
 13 test and shows what it was; yes?
 14 A. Yes.
 15 Q. Yes.
 16 If we go to the next attachment, {NHB00001088}, that
 17 is the BRE test report 297099, as you can see, also
 18 issue 2, also 14 April 2015. You see that? That's the
 19 test report that goes with the classification report
 20 that is also for the July test, isn't it?
 21 A. Yes.
 22 Q. On this document we can see the date for the July test,
 23 it's on page 5 {NHB00001088/5}. "Date of test", if we
 24 just go over to that, "7th July 2014".
 25 Now, going back to the email, if we can, to the

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1 NHBC, and we can go back to the one at the end of May if
 2 you like, which is at {NHB00001109}, we can see there
 3 that there's no mention at all to the NHBC that this
 4 test was only on a research and development product and
 5 not reflective of standard K15, is there?
 6 A. That's correct.
 7 Q. Do you accept that this chain demonstrates that you were
 8 aware that the July 2014 test was being relied upon by
 9 Kingspan to support the use of standard K15 by virtue of
 10 it being sent to the NHBC at the end of May 2015?
 11 A. Like I say, I didn't make the connection that that was
 12 that test at the time.
 13 Q. I mean, it's right, isn't it, that the only reason to
 14 send these two documents, the test report and the
 15 classification report, to the NHBC was in order to
 16 indicate to them that standard K15 was covered by
 17 a relevant BS 8414 test?
 18 A. That's correct.
 19 Q. But you say you didn't spot the point?
 20 A. No.
 21 Q. Let's go on.
 22 If we go to the email chain with the BBA,
 23 14 August 2015, {BBA00000951}, if we go to the top of
 24 the chain, this is an email from Dan Ball, 14 August
 25 2015, to Gayetree Ramkorun, and it's copied to you,

24

1 among others, isn't it?

2 A. Yes, it is.

3 Q. Again, would you have seen this, opened it, read it,
4 when you received it?

5 A. I may not have done, but I possibly could have done.

6 Q. Right.

7 The attachments are the classification report,
8 BR 135, 291642, so again the July 2014 test, and other
9 documents, and Dan Ball, who is the technical project
10 leader, says:

11 "These are the new reports/constructions that we
12 wish to add to the re-issue of the K15 cert (second to
13 be issued under the Kooltherm combo) Gayetree and we
14 have permission from others to use their reports as
15 well, all attached. - see Adam's email below well
16 Gayetree."

17 Now, we can see from the attachments that they
18 include the BR classification 291642, as I've just shown
19 you, so it follows from this, doesn't it, that here is
20 Kingspan sending the July 2014 BR 135 class report to
21 the BBA, that's what they're doing?

22 A. Yes, that's correct.

23 Q. And you can see that happening; yes?

24 A. Yes, I can.

25 Q. Didn't you wonder why Dan Ball was doing that, given

25

1 that, as you would have it, the K15 in that test was
2 a low lambda product and not a K15 standard product?

3 A. No, again, I didn't make that connection at the time.

4 Q. Right. So no connection in the May email run, no
5 connection in the August email run, and no connection in
6 the August document that you signed off in 2015?

7 A. That's correct.

8 Q. Right.

9 Let's then look at the certificate, {BBA00000201}.
10 This is the BBA certificate for K15, re-issued on
11 8 October 2015, as you can see from the bottom of that
12 page on the screen there. If you go to page 5
13 {BBA00000201/5}, please, so this is only three months or
14 so after the August document, we see section 8 here,
15 "Behaviour in relation to fire", and under 8.2 it says:

16 "When tested to BS 8414-1:2002 or BS 8414-2:2005,
17 the following specific cladding constructions met the
18 criteria as stated in BRE Report BR 135:2013."

19 Then there are four constructions set out over the
20 bottom of page 5 and the top of page 6. Construction 1
21 is:

22 "60 mm K15 insulation board ..."

23 "6 mm cement particle boards mechanically fixed ..."

24 That's the 2005 test, isn't it?

25 A. Correct.

26

1 Q. Yes, and one can look over to page 6 {BBA00000201/6} and
2 see the rest of it, which would confirm that, and then
3 three further constructions: construction 2,
4 construction 3 and construction 4.

5 Construction 2 is a build-up using the Careal mineral
6 composite grooved panels, isn't it?

7 A. Yes.

8 Q. Construction 3 was the July 2014 terracotta test, wasn't
9 it?

10 A. Yes.

11 Q. And construction 4 is the Kingspan test done in 2015
12 with the Taylor Maxwell terracotta tiles in April 2015,
13 21 April 2015, isn't it?

14 A. Yes.

15 Q. I mean, if you're in doubt about that, I can show you
16 your schedule that you attach to your fourth witness
17 statement.

18 A. No, I was aware of the April test.

19 Q. For the record, that is confirmed at {KIN00022357}.

20 Now, this certificate, of course, doesn't list the
21 report numbers, rather unusually, I think. But if we go
22 to the next issue of this certificate, we can see that
23 it does. It's {BBA00000200}.

24 This is another issue of this certificate, it's
25 an amended version, and you can see that from the bottom

27

1 of page 1, "Date of First issue: 8 October 2015", and
2 then it says underneath that:

3 "Certificate amended on 16 November 2015 ..."

4 So we know that there was an amendment then.

5 If we go to the equivalent "Behaviour in relation to
6 fire" section at the bottom of page 5 {BBA00000200/5},
7 again we can see paragraph 8.2., if you look there, and
8 it says there:

9 "When tested to BS 8414-1:2002 or BS 8414-2:2005,
10 the specific cladding constructions including the
11 product described in the test reports referred to in
12 Table 4 of this Certificate met the criteria given in
13 BRE Report BR 135:2013 and so are permitted for use
14 above 18m by the national Building Regulations."

15 If you go to the top of page 6 {BBA00000200/6}, you
16 can see the table that's referred to, table 4 -- there
17 it is -- and you can see the third test listed in that
18 list is numbered 291642, which was the July 2014 test;
19 yes?

20 A. That's correct.

21 Q. So it looks as if by mid-August 2015 the BBA were being
22 given the July 2014 test and the class report for the
23 low lambda test, and certainly that was the case by the
24 end of November or mid-November 2015, but not being told
25 that the product being marketed was not the product

28

1 tested.

2 A. That's correct.

3 Q. Did you see the BBA certificate when it came back to you

4 with this amendment?

5 A. I would have looked at the certificate, yes.

6 Q. Would you not have noticed that there, in table 4, was

7 the test number for the test report for the July 2014

8 test?

9 A. I just -- again, I didn't make that connection, that

10 that was that test. I thought that was still a standard

11 test and we could rely on it.

12 Q. Right.

13 A. But that was incorrect.

14 Q. So we now have four occasions on which you didn't make

15 this connection.

16 A. Yes.

17 Q. Right.

18 Let's go to {KIN00002289}. This is an email

19 exchange that you had with Richard Smith from

20 MD Insurance Services in April 2016. So this is the

21 next year. I think we need to start at page 2

22 {KIN00002289/2}, to see what it is that you're

23 responding to. Here is an email from him to you on

24 18 April 2016 at 15.40, "Meeting between Kingspan and

25 MD Insurance". He says:

29

1 "Good afternoon Adrian ...

2 "Following our brief catch up at Ecobuild, I feel it

3 would be useful if we could meet up to further develop

4 our processes of how we deal with high rise buildings

5 and cladding over 18m.

6 "You will no doubt be aware that although we apply

7 BCA guidance note 18 we seem to be more pro-active than

8 other warranty providers that we me (sic) know.

9 However, perhaps on occasion we can still become unstuck

10 with some of these schemes particularly where the

11 standard detail has changed but not significantly.

12 "Some of the areas where we require some support are

13 as follows.

14 "We would benefit from accessing [your] database of

15 test results that confirms that the build up of

16 construction that we are providing a warranty for meets

17 B4 of the Building Regulations."

18 Now, that's a bit of the background.

19 MD were a warranty provider for high-rise buildings,

20 weren't they, or insurer?

21 A. MD Insurance, yes.

22 Q. Now, you respond, if you go to page 1 {KIN00002289/1},

23 also on 18 April, and you say, "It was good to catch

24 up", et cetera, and then you say in the third paragraph:

25 "We can certainly arrange to have access to our test

30

1 report data you can access this via this drop box link."

2 Then you sent him a Dropbox link there, and then you

3 helpfully identify what's in it.

4 If you look at the third and fourth bullet points

5 down, you can see:

6 •" BS 8414-2 (Report No 297099): 80mm K15 onto

7 a 12mm cement particle board behind non-combustible

8 cladding (Taylor Maxwell Terracotta).

9 •" BR 135 (Report No 291642): Based on Report

10 297099. This shows that the system met the performance

11 criteria of BR 135."

12 So just pausing there, those were the test reports

13 and the classification report for the July 2014 test,

14 weren't they?

15 A. That's correct.

16 Q. And then underneath that block of bullet points, we can

17 see you say:

18 "I have also included our current BBA certificate

19 for reference (please note the certificate code has

20 changed)."

21 To cut a long story short, Mr Pargeter, you are

22 clearly representing to MD that the July 2014 test could

23 be relied on to support warranties being granted for the

24 use of standard K15 on high-rise buildings, aren't you?

25 A. That's correct.

31

1 Q. And given that you have accepted that the July 2014 test

2 did not involve standard K15 then being sold and

3 therefore insured by MD, potentially, you must have

4 realised at the time that there was a discrepancy in

5 that respect?

6 A. No, I didn't. It's the same issue. We've got these

7 test reports. I missed it at the beginning, and because

8 I've missed it then, we've just carried -- I've just

9 carried on referring to them in that mistaken belief

10 that it was a standard product, or not appreciating the

11 fact that it wasn't.

12 Q. Well, there are now at least five occasions when you are

13 actively involved in either identifying or actively

14 representing that the July 2014 test was on standard

15 K15. Are you telling us that on not one single one of

16 those occasions did you stop and ask yourself, "Well,

17 hang on, this isn't standard K15, it was an R&D

18 product"?

19 A. No, I didn't.

20 Q. Can you explain why that is?

21 A. I think I was just moving forward with the test

22 programme, we'd done a second test with the terracotta,

23 we'd done a third test, and I just didn't think about

24 making that connection with that one.

25 Q. You are head of technical and marketing. That blended

32

1 role required you -- is this right? -- not only to
 2 understand exactly what it was that was being tested,
 3 but to ensure that what was being sold was as tested?
 4 A. That's correct.
 5 Q. And that is the key focus of your job.
 6 A. It's one of the focuses of my job, yes.
 7 Q. And you would have it that you fell down in that key
 8 focus?
 9 A. Certainly on that one report, yes, I did.
 10 Q. We're dealing with fire safety. That's the purpose of
 11 these tests, isn't it?
 12 A. Yes.
 13 Q. And so your error, as you must have realised at the
 14 time, if you had made an error, would have had
 15 a profound effect on the safety of the use of this
 16 material above 18 metres?
 17 A. I think in hindsight, looking at it, it wouldn't,
 18 because we've got other tests and subsequent tests on
 19 terracotta that we know was on standard product, and
 20 in fact was on thicker product, so potentially a greater
 21 fire load from the insulation perspective, which passed.
 22 So, you know, I would have thought that that test would
 23 also pass with the standard product. So I don't think
 24 that error from my point of view created any risk from
 25 a fire perspective.

33

1 Q. Well, that's an argument based on hindsight, isn't it?
 2 A. Yes, and I'm looking back at this in hindsight.
 3 Q. Really what I'm asking you to do is to accept at the
 4 time that you didn't make such a fundamental error in
 5 matters of life safety; this was a deliberate --
 6 A. No, it wasn't deliberate at all.
 7 Q. -- failure on your part?
 8 A. No, it wasn't deliberate failure.
 9 Q. You would have us believe that it was simply
 10 carelessness?
 11 A. I think it was lack of attention to detail, I'd agree
 12 with that. And also, if it was deliberate, then I would
 13 have understood that that test couldn't be relied on
 14 and, for example, once we'd got the second terracotta
 15 test, theoretically we didn't need that first test. So
 16 had I been doing it sort of deliberately and, let's say,
 17 at risk, if you like, of it not being representative,
 18 then we could have just dropped that test immediately we
 19 got the second test, because we didn't need it anymore,
 20 and we didn't do that because I was unaware of that
 21 first test.
 22 Q. Where did your assumption or thought, erroneous as you
 23 say it was, that standard K15 had been tested
 24 in July 2014 come from?
 25 A. Just my own assumption.

34

1 Q. But you had always known, as you told us yesterday in
 2 some detail, that the July 2014 test was on
 3 a development product?
 4 A. Yes, that was true, I just didn't make the connection
 5 that that was that test.
 6 Q. Well, given that you knew that the July 2014 test was on
 7 a development product, what I'm struggling to
 8 understand, Mr Pargeter, is how that knowledge could
 9 somehow be converted into an assumption that what had
 10 been tested was standard K15?
 11 A. I just didn't make the connection that they were the
 12 same test, and I agree, you know, I should have done.
 13 Q. It's right, isn't it, that there were a number of
 14 desktop studies for standard K15 that relied on
 15 the July 2014 test, weren't there?
 16 A. Yes, I would think so.
 17 Q. We can just look at an example of one, because you give
 18 one in your second statement. Can we look at page 79,
 19 please, of the second statement {KIN00020824/79} at
 20 paragraph 9.6(a). This is the desktop study for Putney.
 21 There are a number of them in there, but if you go to
 22 9.6(a), you can see that you refer to a meeting there,
 23 and if you go to item (v):
 24 "... Kingspan would continue liaising with Exova on
 25 the Putney Plaza project and include the NHBC in

35

1 correspondence ..."
 2 Let's just look at the Putney Plaza desktop study.
 3 It's at {KIN00000193}, please. It's done by Exova.
 4 It's issue 2. It's dated 12 November 2015. If we go to
 5 page 7 {KIN00000193/7} -- and this is a report given to
 6 Kingspan -- we can see a table with a heading which is
 7 "Supporting Documentation", and it says:
 8 "The following reports and drawings have been used
 9 in this assessment of the ventilated external wall
 10 system which is proposed for use on high rise buildings
 11 in Putney Plaza development."
 12 There, in the fifth box down, you can see
 13 "Kingspan K15 Phenolic Foam Insulation"; do you see
 14 that?
 15 A. Yes.
 16 Q. And we can see the BBA certificate, and then underneath
 17 that the BRE report 220876 to BS 8414-1, that's the 2005
 18 test. Then underneath that, two down, the BRE
 19 report 297099 to BS 8414-2. That's the July 2014 test,
 20 isn't it?
 21 A. Yes.
 22 Q. And then BRE report 218611. But we can see from that
 23 clearly that the 297099 test is the July test.
 24 If you go to page 8 {KIN00000193/8}, there's a bit
 25 more. Under paragraph 2 there, Exova have a heading

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1 "BRE Test Report No 297099":
 2 "A fire test in accordance with BS8414-2 (where the
 3 façade system is mounted onto a steel structure rather
 4 than a masonry wall) was carried out on a Kingspan K15
 5 insulated system with a sheathing board of 12mm cement
 6 particleboard and a ventilated Terracotta tile facing."
 7 There is a reference a little lower down to the
 8 facing being Taylor Maxwell (Argeton) Classico.
 9 You were clearly aware of this report at the time,
 10 weren't you, because you discussed it in a meeting with
 11 the NHBC, didn't you?
 12 A. Correct, yes.
 13 Q. Again, is this another occasion on which you didn't spot
 14 the fact that, although the report clearly says that
 15 the July 2014 test had been carried out on
 16 a Kingspan K15 insulated system, in fact it had been
 17 carried out on a research and development system?
 18 A. That's correct.
 19 Q. It's another occasion on which this point was missed by
 20 you.
 21 A. Yes.
 22 Q. Again, do you explain that that was just another
 23 emanation of the same error?
 24 A. It is, yes.
 25 Q. Right.

37

1 Just going back to your third witness statement, if
 2 we can, please, page 56 {KIN00022610/56},
 3 paragraph 7.16, which I showed you to start with, the
 4 fourth line down, you say:
 5 "... I only made the connection that the test I was
 6 involved in from a product development perspective
 7 in July 2014 was being used to support the use of
 8 standard K15 when it was raised by Insulation UK's
 9 solicitors in early 2019 during their disclosure
 10 exercise for the purposes of the Grenfell Tower
 11 Inquiry."
 12 On all the documents we've seen, I've got to suggest
 13 to you that that's simply not true, is it?
 14 A. It is true. It is true. I just simply wasn't aware
 15 that that was that development test.
 16 Q. Well, if it was true, then you must accept that you had
 17 radically failed to a fundamental level in your
 18 obligations of safety in the role you held.
 19 A. I certainly regret the fact that I missed that, but
 20 I don't think, you know, it was a fundamental effect on
 21 fire safety, that error. And maybe I didn't look into
 22 it any further because we'd got other tests that were on
 23 the standard product, which gave me comfort not to look
 24 at it into any deeper detail, but I do -- I regret that,
 25 because that shouldn't have happened on my watch, and it

38

1 did.
 2 Q. I now want to ask you some questions about class 0 and
 3 K15, so a different topic. I would like to take you
 4 through the class 0 testing system which you say K15 has
 5 achieved.
 6 Can we go first, please, to your third witness
 7 statement at paragraph 3.40 on page 29 {KIN00022610/29},
 8 at the top there. You say:
 9 "As far as it has been possible for Insulation UK's
 10 solicitors to piece together the chronology, it appears
 11 that at the time of transfer to new technology K15 in
 12 2006, reliance was initially placed on BS 476 testing
 13 undertaken on two composite phenolic insulation products
 14 produced at Kesteren in order to support the Class 0 and
 15 Low Risk claim of K15. These products were called
 16 DL 2000 and DL 3300."
 17 Can I just ask you, why has it proved necessary for
 18 Kingspan's solicitors to piece together the chronology
 19 of class 0 testing?
 20 A. Well, it wasn't the solicitors that pieced it together,
 21 it was the processing team and the -- and my team as
 22 well, looking into historic records which provided the
 23 evidence which the solicitors then pieced together.
 24 They didn't do the work.
 25 Q. Well, forgive me, but you say, "As far as it has been

39

1 possible for Insulation UK's solicitors to piece
 2 together the chronology ..."
 3 A. Yes.
 4 Q. So is that wrong and it wasn't --
 5 A. They didn't piece it together; they put together the
 6 pieces that we'd investigated.
 7 Q. I see.
 8 On the basis that it was your team that had done the
 9 piecing together, does that tell us that Kingspan didn't
 10 in fact know what testing it was relying on in 2006 when
 11 it made claims about the fire safety of its product to
 12 the general public?
 13 A. I'm not sure I can speak back to 2006, but what we were
 14 doing as part of the exercise was to -- is to go all the
 15 way back and find what test evidence there was within
 16 our systems. So the upshot of that is that it looks as
 17 though we can only be relying on those -- I don't know
 18 whether they're products or reports, DL2000 and DL3300,
 19 but that's what we could tell from the evidence we'd
 20 found.
 21 Q. Does that tell us that Kingspan's testing records were,
 22 to put it neutrally, less than perfect, requiring
 23 an exercise of archaeology in order to put them together
 24 to understand them?
 25 A. Yeah, there was -- there were files and reports kept in

40

1 different places, on people's personal drives, R&D were
2 keeping records, whoever was sort of taking testing
3 processing had got records. There was no overall
4 central database where, going back into 2006, we could
5 find records.

6 Q. I thought you told us yesterday that one of your first
7 jobs when taking on the role of product development
8 manager was to rearrange the record-keeping?

9 A. That was -- so that was in 2014/15, yes.

10 Q. Indeed.

11 A. So records for then are easier to find, but going back
12 to 2006 --

13 Q. I see. So when you took over the role in 2014 and
14 cleaned up the record-keeping, you only did it
15 prospectively --

16 A. Yeah, going forward, yes.

17 Q. Right, but didn't put them together historically?

18 A. No, no.

19 Q. Let's look at the initial reliance on the DL2000 and
20 DL3300 products. Those are numbers in test reports
21 which you have exhibited, I think, to your third witness
22 statement, aren't they?

23 A. Yes.

24 Q. We can look at them, they are at {KIN00022645}, and I'll
25 just put one of them up for you. This is the

41

1 Warringtonfire Research document for a BS 476-7 test.
2 You see that?

3 A. Yes.

4 Q. That's one of the tests you're referring to.

5 If you go to paragraph 3.40 of your third statement
6 {KIN00022610/29}, you can see there, which we've just
7 looked at, that the products were called DL2000 and
8 DL3300, and you have a footnote 14, and you have
9 exhibited those test reports.

10 To cut a detailed and long story as short as I can,
11 what are DL2000 and DL3300?

12 A. I believe they were products manufactured from the
13 Kesteren facility.

14 Q. Right.

15 A. So it was from that facility those tests were taken
16 from.

17 Q. Just focusing on DL3300, I think you do say in your
18 witness statement at paragraph 3.40 that that one was
19 manufactured -- they were both manufactured at Kesteren,
20 were they?

21 A. I believe so.

22 Q. Right.

23 Is DL3300 the same as K15 sold at any time?

24 A. I'm not sure exactly the -- if there's any differences
25 between the Kesteren and the new technology product, but

42

1 I know that was all the records we could find at the
2 time that we could possibly have been relying on in that
3 period. So I think it's very similar, but I wouldn't
4 know the differences between them.

5 Q. Right.

6 How does DL3300, which was produced on a different
7 line in the Netherlands and tested in 2003, allow you to
8 say that new technology K15 produced at Pembridge from
9 September 2006 was class 0?

10 A. Just on the basis that it was a similar product.

11 Q. Right. Again, it's a different product, isn't it?
12 Similar, maybe, but different.

13 A. Like I say, I'm not aware of the details. This is back
14 in 2006, so I'm just pulling together the information
15 that we have been able to find.

16 Q. Right. And the same with DL2000, that's not the same as
17 K15, is it, that's sold at any time after 2006?

18 A. Again, I think the foam technology is the same, but what
19 I wouldn't be aware of is exactly what the facer was on
20 each of them.

21 Q. Right.

22 Would you accept this: although DL3300 and DL2000
23 were deemed to be class 0 products, they weren't
24 representative of what was being sold to customers after
25 2006?

43

1 A. I'm not sure how close, like I say, they were. They
2 were just the test reports we could find that could
3 possibly have been relied on --

4 Q. Right.

5 A. -- to make that claim.

6 Q. Why would they have been relied on to make that claim?

7 A. Because we couldn't find any other evidence --

8 Q. I see.

9 A. -- at around that time.

10 Q. So, to be clear, you're not saying, are you, that the
11 class 0 certificates from 2003 on DL2000 and DL3300 were
12 reliable class 0 certificates or class 0 tests for K15
13 sold after 2006?

14 A. Say that question again, sorry?

15 Q. You're not saying, are you, that the class 0 tests done
16 in 2003 on DL2000 and DL3300 were reliable class 0 tests
17 for the purposes of K15 sold by Kingspan after 2006?

18 A. I can't say that that's exactly what was relied on at
19 the time in the -- you know, in our literature and going
20 forward, because it was very difficult to piece it
21 together. So I think they possibly could be, but we
22 can't make that connection historically.

23 Q. Right.

24 Then let's move to May 2007. Can we go back to your
25 third witness statement -- we're on it actually -- at

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1 page 29 {KIN00022610/29}, paragraph 3.41. You say:
 2 "I understand that new technology K15's Class 0
 3 classification was subsequently supported by tests
 4 undertaken in May 2007 on the foil facer of K15."
 5 Now, when new tech K15 was first introduced and
 6 marketed in and from 2006, had it passed tests under
 7 BS 476-6 or BS 476-7?
 8 A. I think the part 7 it had achieved, but I don't think we
 9 found any records for a part 6 that would have met the
 10 class 0 criteria on the product.
 11 Q. So is this the case -- and I appreciate you were not --
 12 A. Yes.
 13 Q. -- at Kingspan at the time -- is it the case that when
 14 it was first launched or first being sold after 2006,
 15 K15 didn't actually have a true class 0 pass?
 16 A. I think it's true we can't find any evidence of that
 17 from -- like I say, the record-keeping was all over the
 18 place, so we can't find anything. That doesn't mean to
 19 say there wasn't anything, but we can't find it.
 20 Q. Right.
 21 So when you say that new tech K15's class 0
 22 classification was supported by tests undertaken in
 23 May 2007, we don't read that as a reference to
 24 corroborated; these are new tests, is that what you're
 25 saying? New tests and a new classification?

45

1 A. Sorry, which bit are we looking at again, sorry?
 2 Q. Paragraph 3.41. You say that the new technology --
 3 A. Oh, yes, on the foil facer.
 4 Q. Yes.
 5 A. Yes, that's correct.
 6 Q. Yes. You say it was subsequently supported by tests
 7 undertaken in May 2007.
 8 A. That's correct, we've got reports in May 2007 on the
 9 facer for K15 which --
 10 Q. Yes, but you're not saying that they're confirming past
 11 tests, are you, because you don't have the records to
 12 say that?
 13 A. Yes, that's correct.
 14 Q. Now, you then exhibit, as part of your statement, part 6
 15 and 7 tests from some people called Bodycote, who were
 16 effectively part of Warringtonfire; is that right?
 17 A. I think that's who they were before Warrington took them
 18 over or -- I'm not sure of the history of that, but I've
 19 seen Bodycote reports, but I think it's Warringtonfire.
 20 Q. As you said in your statement, the testing was on the
 21 foil facer only; is that right?
 22 A. That's correct, yes.
 23 Q. So there was no test of K15 as a composite product,
 24 foil facer and foam core?
 25 A. No, not that we could find.

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1 Q. No.
 2 Just help me with this broad question: how could
 3 testing of the foil facer alone be representative of the
 4 entire rigid board insulation product that you were
 5 selling?
 6 A. Because in the ADB for England and Wales, the definition
 7 for class 0 on a composite product allows you to test
 8 either the surface or the product of a composite
 9 product, and K15 is a composite product. So it was
 10 belief then and belief now still that you can test the
 11 facer and, if it achieves class 0, then that's fine to
 12 claim that then for the product on which that facer is
 13 a composite with.
 14 Q. We're going to come and examine that view or position,
 15 as you have just described it, a little bit later when
 16 we look at some documents later in the story.
 17 A. Yes.
 18 Q. From your knowledge, that view of ADB, that
 19 interpretation of ADB, was that something held within
 20 the business when you came to it?
 21 A. Yes.
 22 Q. Who held that view when you came to it?
 23 A. Oh, so ... certainly John Garbutt, the marketing
 24 director, he was under that impression; I think Ivor was
 25 under that impression; I think most of the technical

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1 team were under that impression, that that was
 2 an interpretation of ADB, because it's quite -- it goes
 3 back quite a way, like 2007, if not before, that that
 4 was feasible. So I know it was a generally held view
 5 that that was a way to claim class 0 for a -- from ADB.
 6 Q. A way to claim class 0?
 7 A. A route.
 8 Q. A route?
 9 A. Yes.
 10 Q. We'll come back to that answer later on when we look at
 11 some of the arguments in a little bit more detail.
 12 It's right, I think, just at this stage, that you're
 13 then proceeding to sell composite products on the basis
 14 that they are class 0, but based only on a test of
 15 a part of the product, the foil facer?
 16 A. On the foil facer, yes, that's correct.
 17 Q. Now, let's go back to the tests that you refer to,
 18 May 2007, on the foil facer. These are your
 19 exhibit AP3, and let's look at those. It's
 20 {KIN00000256}, please. This is the BS 476-7 test done
 21 in August 2009, it looks like. That's the date of the
 22 report. That's the part 7 test.
 23 Can we look at the part 6 test as well, which is
 24 {KIN00000261}. I'm not sure we need them both up at
 25 the same time, so let's start with the part 7 test and

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1 just identify, if we can, on that document -- it
 2 probably doesn't matter -- what it is that we're looking
 3 at.
 4 The test sponsor is in both cases
 5 Kingspan Insulation. Let's stick with the document
 6 that's on the screen, this is the part 6 test, and the
 7 general description of test product is the same in both
 8 reports.
 9 So let's go back to 256, which is the part 7 test,
 10 because there is more in that I want to show you, and go
 11 to page 5 {KIN00000256/5}, please.
 12 Now, this is the "Description of Test Specimens"
 13 there, and in the first box you can see the general
 14 description:
 15 "A perforated reinforced aluminium foil composite
 16 which was tested stapled to calcium silicate based
 17 board."
 18 Do you see that?
 19 A. Yes.
 20 Q. "The sponsor of the test has stated that the facing is
 21 utilised on products referenced 'Koolduct' and
 22 'Kooltherm'.
 23 By "foil composite", is it just the facer of the
 24 product, that's the foil facer you're referring to?
 25 A. That was tested.

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1 Q. That was tested.
 2 A. Yes.
 3 Q. Then a little bit down the boxes under the section on
 4 the left-hand side, it reads, "Aluminium foil composite"
 5 in vertical. Do you see there is a long rectangular box
 6 on the left-hand side, can you see that, which is in
 7 landscape?
 8 A. Yes, sorry.
 9 Q. "Aluminium foil composite."
 10 A. Yes.
 11 Q. And then it says in the top box or top square "Coating",
 12 can you see that?
 13 A. Yes.
 14 Q. A little bit above that, "Product reference", it says
 15 "Coated Foil".
 16 A. Yes.
 17 Q. So it's telling you that what's tested, I think, is the
 18 aluminium foil composite, where the product is coated
 19 foil, which then has a coating of its own, and what we
 20 see is the elements of the coated foil?
 21 A. Yeah, the foil itself or the facer is made up of
 22 different materials --
 23 Q. Exactly.
 24 A. -- and foil is -- aluminium foil is part of that
 25 make-up.

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1 Q. Yes, thank you.
 2 Now, if we go over the page to page 6
 3 {KIN00000256/6}, underneath the text box there are some
 4 notes, and note 1 says:
 5 "The sponsor of the test has provided this
 6 information but at the specific request of the sponsor,
 7 these details have been omitted from the report and are
 8 instead held on the confidential file relating to this
 9 investigation."
 10 If we go back to see what note 1 refers to, back
 11 a page to page 5 {KIN00000256/5}, do you see it says
 12 "Note 1", "Name of manufacturer", so that's been made
 13 confidential.
 14 A. Yes.
 15 Q. Can you help us as to who the manufacturer of this
 16 coated foil was?
 17 A. I couldn't be sure, but one of the -- or the current
 18 manufacturer of the facer is a company called Lamtec.
 19 Q. Right, okay, we see their name elsewhere.
 20 A. Yes.
 21 Q. Then if we go back up to the top of the text box on
 22 page 5, we can see on the left-hand side a box that says
 23 "Coating", and I've shown you that, but let's just look
 24 at it in a little bit more detail.
 25 Going to the right-hand heading, you can see things

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1 like "Product reference", "Generic type", "Name of
 2 manufacturer", "Application rate/thickness",
 3 "Application method" and "Flame retardant details".
 4 If you look further to the right again into the
 5 furthestmost box on the right, you can see that all of
 6 those topics relating to coating have the text "See
 7 Note 2 below", do you see that?
 8 A. Yes.
 9 Q. Then if you look at note 2 below -- and the same in fact
 10 applies also to foil and glass reinforcement -- it says
 11 on page 6 {KIN00000256/6}:
 12 "The sponsor of the test was unable to provide this
 13 information."
 14 Then it goes on:
 15 "The sponsor has confirmed that some of the
 16 components were manufactured by other parties. They
 17 have also confirmed that they were not able to obtain
 18 from the manufacturers some details that would normally
 19 be included in Boddycote warringtonfire test reports.
 20 The description of the specimens given above is
 21 therefore, not as complete as would normally be the case
 22 for descriptions included in Boddycote warringtonfire
 23 test reports, and the description may not fully comply
 24 with the requirements of the standard. In all other
 25 respects, however, the tests were conducted fully in

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1 accordance with the requirements of the standard and the
2 test results are valid."

3 Now, the same note appears in the same form in the
4 other report for part 6 that I've shown you very
5 briefly.

6 Do you accept that these reports tell you nothing
7 about the coating other than its physical dimensions and
8 that it's aluminium?

9 A. It tells you there's some glass scrim, I think I saw
10 there.

11 Q. Yes.

12 A. There's some description of it, but like it said there,
13 not all the full details are provided.

14 Q. No. So they are either worthless or of very limited
15 use, given the poverty of information given on the face
16 of the certificate?

17 A. I think it's to protect, you know, our IP, our ...
18 you know, we work with these facer suppliers to develop
19 products which work with our products, and we don't want
20 to give too much information away in a test report for
21 our competition to potentially see and see how it's
22 done. So I think that's the reason for withholding some
23 of the information. But then, at the end, you know, the
24 requirements of the standard and the tests are still
25 valid.

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1 Q. Yes, but the report is not transparent as to precisely
2 what it is that's going into your product.

3 A. It's not transparent on the detail or the manufacturer,
4 I agree, but on the make-up and the thickness and the
5 key characteristics, I think it's fairly clear.

6 Q. Well, looking at note 2, there are some components that
7 you didn't know, I think, and couldn't tell Bodycote,
8 but some components that you did know but wouldn't tell
9 Bodycote; is that fair?

10 A. I think that's correct. I mean, it's a test I wasn't
11 involved in, but I think that's a fair reading of that
12 document.

13 Q. So some information was not given to Bodycote in
14 relation to the material they were testing which, but
15 for commercial sensitivities, could have been given to
16 them?

17 A. Yes, I would read into that, yes.

18 Q. Why was Kingspan testing coated foil?

19 A. I think that's just -- that's part of the build-up.

20 Q. Is the foil on standard K15 as being sold to the public
21 at that time and later coated?

22 A. I'm not sure on the exact layers, but I think it's got
23 a layer above the aluminium to stop the aluminium from
24 oxidising, so that could be what the "coated" reference
25 is.

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1 Q. Do you know?

2 A. No.

3 Q. Now, we've seen also, if we go back to page 5
4 {KIN00000256/5}, that the substrate onto which the foil
5 being tested was stapled was calcium silicate based
6 board, wasn't it?

7 A. Yes.

8 Q. Now, calcium silicate is a non-combustible board, isn't
9 it?

10 A. Yes.

11 Q. It's not a combustible phenolic foam.

12 A. No, that's correct.

13 Q. Did you make any of your customers, or do you know
14 whether Kingspan at this time made any of its customers
15 or anybody that was likely to rely on the class 0
16 certification for K15 aware of the fact that Bodycote
17 Warringtonfire had tested the foil on a non-combustible
18 substrate, as opposed to the phenolic foam forming the
19 rest of the product?

20 A. I think we would have claimed that the product got
21 class 0 based on its facer performance. We wouldn't
22 have said necessarily it was based on its facer
23 performance, but we would have based the claim on the
24 facer performance. So I'm not sure whether we would
25 have made it explicit to customers that that's how it's

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1 tested.

2 Q. Did you see a document that said that, although K15 had
3 been tested to class 0, in fact only the foil facer part
4 of K15 as a composite product had been tested to that
5 standard?

6 A. Did I see a document?

7 Q. Did you ever see a document, like a certificate or
8 a report, saying that?

9 A. I don't believe so.

10 Q. No.

11 Now, these reports -- and we can use the one on the
12 screen, which is the part 7 report -- as I've shown you,
13 are dated 2009, but the tests were done in 2007, as we
14 can see from page 4 {KIN00000256/4}, if we just look at
15 page 4. You can see:

16 "Instruction to test: The test was conducted on the
17 10th May 2007 at the request of Kingspan Insulation
18 Limited, the sponsor of the test."

19 Do you know why two years was allowed to elapse
20 between the test date of May 2007 and the report date of
21 2009?

22 A. I don't. That's a long time.

23 Q. It is a long time. Did you ever investigate that
24 question?

25 A. No. I wasn't around in 2007 to investigate that.

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1 MR MILLETT: Mr Chairman, that may be a convenient moment.
 2 SIR MARTIN MOORE-BICK: Is it?
 3 MR MILLETT: I'm going to move to a different subtopic, but
 4 it's still the same general topic.
 5 SIR MARTIN MOORE-BICK: If that's a good point, we ought to
 6 take advantage of it.
 7 We will take a short break now, Mr Pargeter. We
 8 will come back at 11.35, please. Please don't discuss
 9 your evidence or anything to do with it while you're out
 10 of the room.
 11 THE WITNESS: Of course.
 12 SIR MARTIN MOORE-BICK: Thank you.
 13 (Pause)
 14 Thank you, 11.35, then, please.
 15 (11.20 am)
 16 (A short break)
 17 (11.35 am)
 18 SIR MARTIN MOORE-BICK: All right, Mr Pargeter?
 19 THE WITNESS: Yes.
 20 SIR MARTIN MOORE-BICK: On we go, then.
 21 Yes, Mr Millett.
 22 MR MILLETT: Thank you, Mr Chairman.
 23 I now want to ask you about the testing for class 0
 24 in May 2011 and then again in May 2012.
 25 Now, again, I appreciate that you were not

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1 overseeing K15 at that time within Kingspan, but I just
 2 want to ask you some of the history.
 3 Can we look at your third witness statement, please,
 4 at page 29 {KIN00022610/29} again, and look at
 5 paragraph 3.42 together. You say there:
 6 "At the time of filing my Second Witness Statement,
 7 I understood that new technology K15 had subsequently
 8 been tested to BS 476 as a composite product and had
 9 satisfied the criteria to be classified as both Low Risk
 10 and Class 0. This is set out in paragraphs 3.18 to 3.19
 11 and 3.40 of my Second Witness Statement where I explain
 12 that in my role as Head of Technical and Marketing
 13 (Great Britain) in 2016, having asked my team to review
 14 the BS 476 test reports held on file for K15,
 15 I understood that the BS 476 tests undertaken on
 16 6 May 2011 and 9 May 2012 provided this confirmation."
 17 It's that last sentence I want to ask you about.
 18 Are you telling the Inquiry there that in 2016, in
 19 your senior role that you occupied at that point, you
 20 relied on or were told you could rely on the BS 476
 21 tests from May 2011 and May 2012?
 22 A. Yes, that was the data we'd got.
 23 Q. Right. Those were tests on the composite product, and
 24 were you told at that stage that you could rely on those
 25 tests to show that standard K15 could achieve class 0?

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1 A. I believe so, yes.
 2 Q. Right.
 3 You go on at paragraph 3.44, over the page, please,
 4 at the top of page 30 {KIN00022610/30}, to say:
 5 "Since filing my Second Witness Statement,
 6 Insulation UK has undertaken further investigations
 7 around historic BS 476 testing of K15 and its Low Risk
 8 classification as recorded in its product literature.
 9 I set out below the findings of these investigations
 10 which have altered my previous understanding."
 11 Then at (b) you say:
 12 "Insulation UK has identified that, although the
 13 associated test report records the product tested as
 14 K15, the BS-476 Part 6 test carried out on 9 May 2012
 15 was in fact conducted using a research and development
 16 version of K15 which had a fire retardant lacquer
 17 applied to it. This further detail and understanding
 18 was obtained by a review of the Standard Operating
 19 Procedure ('SOP') (where available) for the product
 20 tested in each of the BS 476 tests listed in [and then
 21 you give three references] ... The SOP records the
 22 precise composition of the tested product and it is
 23 therefore possible to identify where non-standard
 24 product was tested. In their review of test reports in
 25 2016, my team had relied on the reference to 'K15' in

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1 the test report and understood that standard K15 had
 2 been tested."
 3 Now, first, can you tell us what the reason was why
 4 these investigations didn't take place in 2016, before
 5 you were briefed, but only after October 2019, when you
 6 did your second statement?
 7 A. We did do some research in 2016, and we looked at the
 8 historic evidence, but this was taking back what was in
 9 place in 2012. In 2016, we did further testing.
 10 Q. But when you looked at the historic position in 2016, is
 11 it that the investigations done at that stage didn't
 12 reveal the true composition of the --
 13 A. No, that's what I -- the team had looked at the reports,
 14 could see that they were on the composite product, and
 15 thought that they were applicable to be relied on
 16 historically.
 17 Q. Right.
 18 It's right, isn't it, that Kingspan have given three
 19 different versions of the spreadsheet showing the BS 476
 20 testing, the most recent being version 3 on 17 January
 21 this year?
 22 A. I can't specifically remember that, but --
 23 Q. Well, the three --
 24 A. -- I'll take your word for that.
 25 Q. Sorry to interrupt you. The three spreadsheets are

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1 those for which you have provided the references --
 2 A. Yes.
 3 Q. -- in paragraph (b).
 4 A. Yes.
 5 Q. The first version is the one you have referred to there
 6 first, {KIN00022310}, and that's October 2019.
 7 Version 2 was 8 November 2019, and that's the next
 8 reference. The most recent one is the most recent one
 9 in January this year for which you give that last
 10 reference. So it's taken three goes, essentially.
 11 A. Yes.
 12 Q. Right.
 13 Can you also confirm to us that the tests done in
 14 May 2011 and May 2012 that you refer to were originally
 15 in the list of class 0 tests for K15 that was provided
 16 to the Inquiry?
 17 A. Oh, I'd have to double check.
 18 Q. Okay, well, we can do that, but take it from me that
 19 that is the case.
 20 Isn't it right that it was only when you produced
 21 your third statement in September 2020 that Kingspan
 22 told the Inquiry that a fire retardant lacquer was used
 23 in this test along with a research and development
 24 product?
 25 A. Which report -- which witness statement is this one, the

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1 third one?
 2 Q. The third statement, 18 September 2020.
 3 A. Yes.
 4 Q. Now, you have said here on the page in front of us that
 5 your team had relied upon the fact that the report
 6 referred to "K15", and therefore believed that the
 7 report could be used as a class 0 classification just by
 8 that reference; is that right?
 9 A. Yes.
 10 Q. But you now say that that was an error; yes?
 11 A. Yes.
 12 Q. Are you saying that your team's error was that they
 13 didn't look at the SOP records for the May 2012 test?
 14 A. Yes, that's correct.
 15 Q. Why didn't they look at the SOP?
 16 A. I think because we understood that it had been --
 17 claimed the 476, and they just found those reports, and
 18 thought: oh, there's the evidence for that.
 19 Q. Right.
 20 A. Without thinking that there would be a difference in it.
 21 Q. Who was it in the team that you refer to who failed to
 22 look at the SOP when briefing you in 2016?
 23 A. I think it might have been Dan Ball would have been
 24 looking at that evidence.
 25 Q. Why wouldn't the SOP have been the most obvious thing to

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1 look at straight away to identify precisely what it was
 2 that had been tested?
 3 A. I think because it just wasn't suspicious that it was
 4 something that it didn't say it was.
 5 Q. Can you explain why it was only on the Inquiry's request
 6 for a third statement from you that this information has
 7 come to light?
 8 A. Because then the technical team were going away and
 9 looking at all of the 476-6 and 7 tests that we'd got
 10 and getting into the detail around each of those tests,
 11 and it was then, when we started looking at the SOP, we
 12 realised that that had got a lacquer on it.
 13 Q. Do you accept that keeping precise and complete records
 14 of exactly what is being tested and when is
 15 a fundamental part of Kingspan's safety and testing
 16 programmes?
 17 A. I think it should be, yes.
 18 Q. And certainly should have been from the time you took
 19 over that aspect of the role in late 2013/early 2014.
 20 A. Yeah, the record-keeping certainly gets better.
 21 Q. Well, yes, and are you saying that in the case of these
 22 2012 class 0 tests, there are no precise and complete
 23 records?
 24 A. I think we struggled to find them, again, in a similar
 25 way. We had to search around to see where those tests

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1 had -- to find what we might have relied on
 2 historically, to find those tests.
 3 Q. Why is that, given that one of your roles on coming into
 4 the product development manager role in late 2013 or
 5 early 2014 was to improve the record-keeping?
 6 A. Record-keeping of products we were developing going
 7 forward, not of the historic test data of current
 8 products.
 9 Q. Ivor Meredith told us in his witness statement -- it is
 10 paragraph 55 {KIN00022312/26}, for those who want to see
 11 it -- that Kingspan kept meticulous records. Is that
 12 wrong?
 13 A. In certain aspects, I think we did, but not across the
 14 board, we didn't.
 15 Q. Is it the case that Kingspan in fact has tried to hide
 16 its lack of successful class 0 testing and has only
 17 really revealed it to the Inquiry by degrees, so that it
 18 only really emerged --
 19 A. No, I don't --
 20 Q. -- weeks or so?
 21 A. I don't believe that's the case, no.
 22 Q. Right. You don't accept that.
 23 Was the research and development product tested to
 24 class 0 in May 2011 and again in May 2012 a low lambda
 25 version of K15 or a similar development product?

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1 A. I'm not sure. I think it was only the facer that had
 2 got the fire retardant lacquer on it.
 3 Q. Right. So a research and development product of the
 4 facer alone?
 5 A. I believe so. I believe the core was the same.
 6 Q. Do you know why the research and development product of
 7 the facer alone was tested and not standard K15 as
 8 a composite product in 2011/2012?
 9 A. Because it appears that particular test was an R&D test
 10 on a development of the facer material.
 11 Q. Do you know why Kingspan were testing with
 12 fire retardants at all?
 13 A. I think just to see what effect they have on the fire
 14 performance of the product or the facer.
 15 Q. Was that because of the lack of successful class 0
 16 testing on the foil facer to date?
 17 A. No, I think the face -- the facer was able to achieve
 18 class 0 from 2007, so I think it might have been to see
 19 if we could get low risk, but I'm not sure.
 20 Q. Well, you say the facer was able to achieve class 0 from
 21 2007; that is only a reference, isn't it, to the 2009
 22 test reports we've just seen?
 23 A. Yes.
 24 Q. Yes, I see.
 25 Do you know who made the decision to conduct these

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1 tests on the foil facer in 2011 and 2012?
 2 A. I don't.
 3 Q. Did you ever look into that question?
 4 A. I haven't personally. I don't think --
 5 Q. Right.
 6 A. -- we have, no.
 7 Q. Do you agree that anybody looking at the report would be
 8 able to see that the coating had a fire retardancy?
 9 A. No.
 10 Q. You don't agree --
 11 A. Sorry, I do agree.
 12 Q. You do agree?
 13 A. Yes.
 14 Q. Would you agree, therefore, that if either you or your
 15 team had read the reports in 2016, it would have been
 16 obvious to you that the test involved a non-standard
 17 foam with a fire retardant added to the foil, and
 18 therefore should never have been relied on as support
 19 for K15 as sold?
 20 A. I don't think it was a non-standard foam.
 21 Q. Well, forget that part of the question, then. Let's try
 22 it again: would you agree with me that if you or your
 23 team had read the report, it would have been obvious
 24 that the test involved a fire retardant added to the
 25 foil and therefore could never and should never have

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1 been relied upon for the sale of standard K15?
 2 A. Yes, that report should not have been relied on.
 3 Q. Let's then come to 2016 class 0 testing. If we can look
 4 at your second statement, please, this is October 2019,
 5 page 8 {KIN00020824/8}, paragraph 3.11, we see you say
 6 there:
 7 "When the foil facer of K15 (as opposed to the
 8 product as a whole) is tested to BS 476-7 it is
 9 classified as Class 1, as regards its contribution to
 10 flame spread (test report P100160-1002-1). When the
 11 foil facer of K15 is tested to BS 476-6, it achieves a
 12 fire propagation index of (i) 1.8; and sub-index of (ii)
 13 1.7 (test report P100160-1002-2), meaning that K15
 14 achieves a 'Class 0' classification, as was defined in
 15 ADB. This remained the case until ADB was updated in
 16 February 2019 when such classifications were removed.
 17 I address 'Class 0' in detail in my response to Inquiry
 18 question 16 below. K15 was until 2016 classified as
 19 'low risk' and then from thereon was classified as
 20 'medium risk' in Scotland in accordance with the
 21 Scottish Technical Handbook as referenced in Annex 2.B
 22 table 2.8 reaction to fire. This remained the case
 23 until the Scottish Technical Handbook was updated in
 24 October 2019 when such classifications were removed."
 25 Now, the test reports you refer to here you exhibit

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1 at AP3 and AP4, as we can see from footnote 5 and 6 at
 2 the bottom of the page. Can you see that? Yes?
 3 A. Yes.
 4 Q. Those are, am I right, both from the BRE, with the
 5 part 7 test being undertaken on 29 February 2016 and the
 6 part 6 being undertaken on 19 February 2016?
 7 A. Yes.
 8 Q. Let's look at those together.
 9 First, can we go to {KIN00020827}, and this is the
 10 BS 476-7 test that you exhibit as AP3, and you can see
 11 the date there, 29 February 2016, with that long report
 12 number that I read out to you, issue 1. You can see
 13 that it's a BS 476-7 test.
 14 If we can go to page 5 {KIN00020827/5}, we can see
 15 the test date, 10 February 2016, we can see that, and if
 16 we go back a page to page 4 {KIN00020827/4}, we can see
 17 section 2.2, which is the "Description of sample and
 18 test format", and the third box down you can see:
 19 "Sample name/reference: Samples of the K15, KD, K18
 20 and K17 Blank Insulation Board facer."
 21 So this was a sample of the facer of various
 22 Kingspan products, including K15, but not the whole
 23 product in each case?
 24 A. Correct.
 25 Q. Under the "Sample description", we can see it says:

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1 •" Lamtec Foil facing.
 2 •" 0.38mm thick.
 3 •"176 [grams per square metre] - Weight per unit
 4 area.
 5 •" Foil/silver colour."
 6 Underneath that:
 7 "Description of sample (as received): Perforated
 8 reinforced foil with a white fibrous backing."
 9 So we have confirmed that the test here is on the
 10 foil facer alone. That would tell us, wouldn't it, that
 11 it wasn't representative of the K15 being sold in the
 12 market?
 13 A. It was the foil facer that was on the K15 sold in the
 14 market.
 15 Q. Right.
 16 Why were you testing only the facer separately from
 17 the foam or other components of the K15 product?
 18 A. Because in ADB, that's an allowable route for testing
 19 for class 0 on a composite product.
 20 Q. I see. And why was the facer 380 microns or
 21 0.38 millimetres thick?
 22 A. Because that's the overall thickness of the composition
 23 of the facer.
 24 Q. Was that the thickness of the foil alone or did it
 25 include the glass fibre mesh or scrim?

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1 A. No, it's the complete composite.
 2 Q. It's the complete composite of the --
 3 A. Foil. Of the facer.
 4 Q. Right, I see. So you're testing not the surface alone,
 5 but you're testing the composite material making up the
 6 outer skin?
 7 A. You're testing the complete facer.
 8 Q. Exactly, which has a number of different parts to it --
 9 A. Yes.
 10 Q. -- which is what accounts for its depth.
 11 A. Its overall thickness with a 25-micron foil element to
 12 that.
 13 Q. Right.
 14 What is the white fibrous backing that's referred to
 15 under "Description of sample"?
 16 A. It's the -- I think we call it a scrim. It's a glass
 17 reinforcement at the back.
 18 Q. Does that normally on the whole composite product --
 19 A. Yes.
 20 Q. -- sit between the foam and the facer?
 21 A. It's part of the facer make-up.
 22 Q. It's part of the back of the facer where --
 23 A. Yes.
 24 Q. -- it sticks on to the foam, is that --
 25 A. Yes.

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1 Q. And presumably there is an adhesive, is there, or
 2 a bonding process that bonds this skin with the scrim to
 3 the foam; yes?
 4 A. Yes, as part of the process it's sort of auto adhesively
 5 bonded to the reacting foam as part of the process.
 6 Q. I see. So are you saying that the whole of the product,
 7 comprising the Lamtec foil facing and the fibrous
 8 backing, was representative of that same element of the
 9 K15 as sold?
 10 A. Yes.
 11 Q. Let's go then to the part 6 test at {KIN00020828}. This
 12 is the report dated 19 February, and if we go to page 4
 13 {KIN00020828/4} we can see the test dates. Again, top
 14 of the page, we can see the objective, and we can see at
 15 the bottom of the page a date of test, 18 and
 16 19 February 2016. Again, we can see the same
 17 composition. So the questions I asked you in relation
 18 to the part 7 test would also apply to the part 6 test,
 19 would they?
 20 A. Yes.
 21 Q. So looking at these tests done in 2016, they were not
 22 tests on the composite product sold to the market; they
 23 were tests on a part of the composite product sold to
 24 the market only.
 25 A. On the facer element.

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1 Q. And the facer element had itself a number of different
 2 composite elements, didn't it? As you can see, it has
 3 a foil facing and it has a scrim.
 4 A. Yes.
 5 Q. Fibrous backing; yes?
 6 A. Yes.
 7 Q. You didn't test the fibrous backing on its own, did you?
 8 A. No, we don't receive it separated. We receive it from
 9 Lamtec completely laminated in that form.
 10 Q. So you're testing a composite product, even though it's
 11 the outer skin of a bigger composite product?
 12 A. Yes.
 13 Q. So is it right that K15 as sold to the customer itself
 14 never had a class 0 classification, only part of it, the
 15 surface?
 16 A. That's correct.
 17 Q. I'm going to come back to class 0 shortly, but can
 18 I deviate and ask you about BS 8414 and the question of
 19 perforations.
 20 Can we go to an email chain at {KIN00003894}. This
 21 is an email chain about the printing of a logo on the
 22 standard K15 boards, but the part I want to look at with
 23 you is an email from Ivor Meredith at the bottom of
 24 page 2 {KIN00003894/2} and over to the top of page 3.
 25 If we look at the bottom of page 2 together, this

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1 email starts from Ivor Meredith, 23 June 2014, and we
 2 can see who receives it over the page {KIN00003894/3},
 3 and one of the recipients is you by copy. Can you see
 4 that?
 5 A. Yes.
 6 Q. The main recipients are Mark Swift, Malcolm Rochefort,
 7 Gwyn Davies and John Garbutt. The subject is "K15
 8 unprinted", and it's about a facer switch on K15.
 9 In the last paragraph, Mr Meredith says this:
 10 "This is not directly related however all copied
 11 should be aware of the issue:- Perforations.
 12 "When we first started making K15 in NT Technical
 13 Applications were under the impression K15 was only to
 14 be perforated on one side. i.e. use the K10 facer. The
 15 addition of perforations has shown a marked reduction in
 16 performance in the Euroclass tests and will obviously
 17 change VR and WVT. Furthermore several cladding system
 18 suppliers and frame manufacturers have tested their
 19 systems with K15 for rainwater penetration. I have not
 20 seen any results for K15 since we have started using
 21 perforations on both sides. I did put a request in to
 22 revert to perforations on one side only however this can
 23 be reviewed after the next BS 8414 test which will occur
 24 at the end of the month."
 25 That was in fact what happened as the July 2014

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1 test.
 2 Now, it's clear by that, isn't it, that the
 3 reference to "NT" is there, "NT technical applications".
 4 You must have been aware when reading that at the very
 5 latest that there was new technology K15 being used by
 6 that date.
 7 A. Yes, that's correct.
 8 Q. Yes.
 9 Can you just help us, what is VR and WVT that he
 10 refers to in the fourth line there?
 11 A. I'm not sure of VR. I think the other one is moisture
 12 vapour transfer, water vapour transfer.
 13 Q. Water vapour transfer, right.
 14 Did you understand this email as telling you that
 15 where the foil on K15 boards was perforated on both
 16 sides, it would perform less well in fire tests?
 17 In fact, it says just that, doesn't it?
 18 A. It does.
 19 Q. And given the date of this email, 23 June 2014, as
 20 I said to you or put to you a moment ago, the next
 21 BS 8414 test would be the one in July 2014, which was
 22 the 7 July test; yes?
 23 A. Yes.
 24 Q. And that test was done using perforated and unperforated
 25 50-micron foil, wasn't it?

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1 A. Yes.
 2 Q. We can go back to the schedule if you'd like at
 3 {KIN00022357} --
 4 A. I think that's correct.
 5 Q. -- but you accept that.
 6 Now, as we know, that test passed BS 8414 using
 7 a product which does not have perforations on both
 8 sides. So when you saw the results of the July 2014
 9 BS 8414 test, did you think that one of the reasons it
 10 may have passed was because the foil in that test only
 11 had perforations on one side, not both?
 12 A. No.
 13 Q. Why is that?
 14 A. Because, like I said I think yesterday, at that scale,
 15 the perforations just won't have an effect. At the
 16 scale there, the Euroclass scale, which is where he says
 17 there's a difference, I can understand why at that scale
 18 you might see a difference in the performance.
 19 Q. Indeed. But, as you can see, of course, this, as you
 20 have accepted, is a communication before that test.
 21 My question is: when you saw the results of
 22 the July 2014 test, did you not think that one of the
 23 reasons that it might have passed was because the foil
 24 only had perforations on one side as opposed to both?
 25 A. No.

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1 Q. And although you are right to say that the addition of
 2 perforations shows a marked reduction in the Euroclass
 3 tests, which are not 8414 tests, as you say, why would
 4 it not occur to you that one of the reasons why the test
 5 under 8414 had passed was because the perforations
 6 weren't on both sides?
 7 A. Simply because of the demand from the fire from the test
 8 is so much greater in an 8414 test than it is in an SBI
 9 test that the facer element offers, just, like I said
 10 yesterday, no protection to the product in that type of
 11 test, where you can get in excess of 1,000 degrees.
 12 An SBI test -- there are two parts to an SBI test:
 13 there's the FIGRA, so the fire index, and then there is
 14 heat release, and the FIGRA is measured in just the
 15 first 15 seconds of the test. So the facer in that
 16 element of the test can have a more marked impact on the
 17 performance than it would in a test done at 8414.
 18 Q. So was it your view at the time that Ivor Meredith was
 19 wrong to raise the question of perforations, given your
 20 view at the time that perforations one side or the other
 21 side was irrelevant in an 8414 test?
 22 A. Was he wrong to raise it? Is that -- I don't think he
 23 was wrong to raise it, but I don't think logically it
 24 could have an effect.
 25 Q. Was that your view at the time or now?

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1 A. Definitely now. Back at 2014? I think I would -- yes,
 2 I would have had that view based on just that same logic
 3 of an 8414 test.
 4 Q. If that was so, Mr Pargeter, why didn't you respond to
 5 this august group -- and these are senior people, many
 6 of whom are from technical, including Tony Millichap --
 7 and say to Ivor Meredith, "Ivor, I don't understand this
 8 perforations question because they're irrelevant in
 9 an 8414 test, whatever you may think of performance in
 10 a Euroclass test"?
 11 A. I just didn't. I was cc'd in, I didn't --
 12 Q. Right.
 13 A. I didn't think to respond to it.
 14 Q. I've got to suggest to you that what you're telling us
 15 may be your view now, but it was not your view at the
 16 time.
 17 (Pause)
 18 A. I can't recall exactly what my view at the time was.
 19 Q. Well, had you disagreed with it and had the view you
 20 hold now, or tell us you espouse, you would have gone
 21 back to him and said, "You're leading us down the garden
 22 path, perforations are irrelevant when it comes to
 23 an 8414 test".
 24 A. I would possibly do now, yes.
 25 Q. I would like to take you in a little bit more detail

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1 through the question of testing the facer alone, going
 2 back to class 0.
 3 If we can go first to your second witness statement,
 4 please, at page 9 {KIN00020824/9}, the best place to
 5 start with this, I think, is at paragraph 3.14. This
 6 relates to an Inquiry question, 1(e), "purpose/intended
 7 use". You say there under:
 8 "Inquiry question (Not numbered): If your
 9 understanding as to any of the above has significantly
 10 changed at any stage, please explain how and when this
 11 change in understanding came about."
 12 At 3.15 you say:
 13 "As noted in paragraph 3.11 above, K15 was until
 14 October 2019 classified as 'medium risk' in Scotland.
 15 Prior to the 10th issue of the K15's product literature
 16 issued in July 2016 K15 was said to be a 'low risk'
 17 product."
 18 A. Yes.
 19 Q. Now, just pausing there, you say that K15 was classified
 20 as low risk in Scotland until July 2016, when it was
 21 described as medium risk; my question is: did your
 22 marketing literature spell out that change in 2016 from
 23 low to medium?
 24 A. No, I think we just dropped the low risk element.
 25 Q. Yes, you just dropped the low risk element and said

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1 nothing at all about risk?
 2 A. Yes, that's correct.
 3 Q. At least for a period.
 4 A. Yes, for a period.
 5 Q. Yes, we'll look at the documents on that.
 6 Is that because K15 couldn't achieve a low risk
 7 classification in Scotland so it was removed from your
 8 marketing literature?
 9 A. That's correct.
 10 Q. Now, am I also right in saying that you didn't do
 11 anything positive to tell your market of that fact, and
 12 didn't in fact expressly say that the product was medium
 13 risk until 2019, after the Grenfell Tower fire?
 14 A. That's correct.
 15 Q. Now, at the bottom of page 9 you explain the low risk in
 16 Scotland, and at 3.16 you set out the Scottish Technical
 17 Handbook definition, and you say:
 18 "By way of background, the Scottish Technical
 19 Handbook as referenced in Annex 2.B table 2.8 reaction
 20 to fire (prior to 2019 update) defined a 'low risk'
 21 product to be a product where 'the surface material (or
 22 where it is bonded throughout to a substrate, the
 23 surface material combined with the substrate) has
 24 a surface of Class I and, when tested in accordance with
 25 BS 476:Part 6:1981 or BS 476:Part 6:1989 has an index of

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1 performance (i) not more than 12 and a sub-index (ii)
 2 not more than 6."
 3 In the next paragraph you say:
 4 "This therefore requires that the whole composite
 5 product is tested and must achieve the requisite fire
 6 propagation index results. This differs from the
 7 requirements of the 2006 edition of ADB in England and
 8 Wales which requires that either 'the product or [and
 9 you have underlined these words] the surface material of
 10 a composite product' achieve the necessary fire
 11 propagation index results. Thus the definition of 'low
 12 risk' includes the surface material and the bonded
 13 substrate whilst the Class 0 standard tests either the
 14 whole product or the surface of the material."
 15 Now, you have set out there an understanding. Was
 16 that really how you understood Approved Document B from
 17 the time you became product development manager at the
 18 end of 2013?
 19 A. No, it was when I became in the technical role, when we
 20 started to look at class 0.
 21 Q. So May 2015?
 22 A. Yes.
 23 Q. Right.
 24 A. From then on.
 25 Q. But is that really how you understood it?

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1 A. Yes.
 2 Q. So to take an extreme example, if the foil facer was
 3 bonded to a substrate made of dynamite, you thought that
 4 the composite product would still pass class 0 if the
 5 foil facer passed?
 6 A. No, I wouldn't have thought that.
 7 Q. Why not?
 8 A. Because part of part 6, there's a table there which says
 9 if it's attached to an insulation element, so you
 10 couldn't do it to a piece of dynamite.
 11 Q. But if you're testing your foil alone, your facer alone
 12 without the substrate to which it's attached, how do you
 13 know how it will perform under class 0 unless you test
 14 the whole product?
 15 A. You know the facing material of the product will achieve
 16 class 0.
 17 Q. And that's why I asked the question.
 18 A. Which is the requirement of --
 19 Q. Was it really your understanding that it was completely
 20 irrelevant what you attached the foil facer to?
 21 A. I suppose technically, yes, but in reality, no.
 22 Q. Technically yes and in reality no is a difference. So
 23 let's just see if we can understand that.
 24 Technically yes, do you mean on a strict, literal
 25 reading of ADB?

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1 A. Yes.
 2 Q. But in reality you mean on a commonsense reading of ADB?
 3 A. Yes.
 4 Q. Yes. So on your technical reading of ADB, you could
 5 staple the foil facer to dynamite and put it on
 6 a building above 18 metres and call it class 0.
 7 A. No, because you wouldn't have a classification of
 8 class 0 applied to a stick of dynamite. It wouldn't be
 9 a requirement.
 10 Q. Well, if it's irrelevant what sits underneath your
 11 foil facer, it doesn't matter whether it's brick --
 12 A. That's why I say technically.
 13 Q. -- or whether it's foam or whether it's dynamite.
 14 SIR MARTIN MOORE-BICK: Just let counsel finish.
 15 A. Sorry. That's why I say technically.
 16 MR MILLETT: Yes.
 17 A. But not in reality, because those types of products
 18 won't have a classification of class 0.
 19 Q. So do we take it from that that actually what Kingspan
 20 were doing with your adoption of the view was pursuing
 21 a technical interpretation of ADB, but not an in-reality
 22 or commonsense interpretation of ADB?
 23 A. I think it's a technical interpretation, but it's on
 24 an insulation product. So it's a commonsense approach
 25 as well.

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1 SIR MARTIN MOORE-BICK: If you test the facer --
 2 A. Yes.
 3 SIR MARTIN MOORE-BICK: -- I can see that you might be
 4 justified in describing the facer or the surface of the
 5 product as having a class 0 or being of class 0
 6 category, but not the product if you're talking about
 7 the combined material. Would that be fair?
 8 A. I think under ADB, the definition, you can have your
 9 composite product by the surface of that composite
 10 product.
 11 SIR MARTIN MOORE-BICK: You mean you think ADB allows you to
 12 describe the whole product, the insulation, let's say --
 13 A. Yes.
 14 SIR MARTIN MOORE-BICK: -- which is the real guts of it --
 15 A. Yes.
 16 SIR MARTIN MOORE-BICK: -- as having a class 0
 17 classification --
 18 A. Based -- sorry.
 19 SIR MARTIN MOORE-BICK: -- just because the foil facer --
 20 A. I believe so.
 21 SIR MARTIN MOORE-BICK: -- was tested in accordance with
 22 class 0?
 23 A. I believe so.
 24 SIR MARTIN MOORE-BICK: It doesn't seem very sensible, does
 25 it?

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1 A. Just the way it's written, I think.
 2 SIR MARTIN MOORE-BICK: All right, thank you.
 3 MR MILLETT: Yes, just the way it's written, so that's why
 4 I'm asking you whether Kingspan was pursuing
 5 a deliberate policy of approaching the testing on just
 6 the way it's written, as opposed to taking
 7 a commonsense, in-reality approach to it?
 8 A. No, I think it's -- I think it was both. It was part of
 9 the definition, which was different in -- for class 0
 10 than it is for low risk.
 11 Q. Let's just look at that a little bit more closely.
 12 Did you at any stage read the actual test standards
 13 for BS 476-6 or 7 in arriving at this particular
 14 interpretation of the test requirements?
 15 A. Not the test standards, just ADB.
 16 Q. Right. Well, let's just look at those.
 17 Before I do, can I ask you: why didn't you look at
 18 the test standards and only content yourself with ADB?
 19 A. Because I -- the team who were doing the testing were
 20 far more familiar with the standards than I was, so I --
 21 Q. Did it not occur to you to ask yourself the question:
 22 how can this be? How can we get away legitimately with
 23 calling a composite product class 0 by only testing the
 24 foil facer? Did that question not occur to you?
 25 A. Only by the interpretation in ADB.

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1 Q. Yes, and having seen ADB, did it not occur to you, "This
2 cannot be right" or "This is an interesting
3 interpretation, I wonder what the test standards
4 actually require"? Did that question not occur to you?
5 A. No, I thought it was an alternative interpretation, but
6 I didn't think the test standards would have any bearing
7 on that.
8 Q. Did you ask any member of your technical team, from the
9 latest May 2015, when you took on the technical role, to
10 go and look at the test standards and just double check
11 whether the test standards themselves supported this
12 technical interpretation of ADB?
13 A. No.
14 Q. Can we look at the test standards. This is
15 {BRE00005557}, which is the test standard BS 476-6. Is
16 this a document familiar to you at all, even today?
17 A. Yes.
18 Q. When did you first become familiar with this document?
19 A. Probably a year ago, maybe --
20 Q. So not during your tenure -- well, I suppose you're
21 still head of technical, aren't you?
22 A. Yes, yeah.
23 Q. But not at any time prior to the fire?
24 A. No.
25 Q. And not at any time --

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1 A. No.
2 Q. -- before you did your first or indeed second witness
3 statements?
4 A. No, correct.
5 Q. Let's look at page 18 {BRE00005557/18}, please, which is
6 appendix B. On the left-hand side of the page, we can
7 see "Appendix B Effect of thermal characteristics on the
8 performance of assemblies". It says:
9 "With thin materials or composites, particularly
10 those with a high thermal conductivity, the presence of
11 an air gap and the nature of any underlying construction
12 may significantly affect the ignition performance of the
13 exposed surface. Increasing the thermal capacity of the
14 underlying construction increases the 'heat sink' effect
15 and may delay ignition of the exposed surface. Any
16 backing provided to the test specimen and in intimate
17 contact with it, such as the non-combustible packing
18 pieces, may alter this 'heat sink' effect and may be
19 fundamental to the test result itself. The influence of
20 the underlying layers on the performance of the assembly
21 should be understood and care should be taken to ensure
22 that the result obtained on any assembly is relevant to
23 its use in practice."
24 I'll just finish off some reading of the rest of
25 this I want to show you. In the right-hand column it

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1 says:
2 "The following advice is offered on the construction
3 and preparation of test specimens."
4 Then I think if you look at (c) and (d) you will see
5 this:
6 "c) Where the product is to be used over a low
7 density non-combustible substrate and the
8 characteristics noted in a) do not apply [which is about
9 thermal properties] then the product should be tested in
10 conjunction with that substrate.
11 "d) Where the product is to be used over
12 a combustible substrate and the characteristics noted in
13 a) do not apply, then the product should be tested in
14 conjunction with that substrate."
15 Now, is it right that the result obtained from
16 a test on a piece of foil facer stapled to
17 a non-combustible calcium silicate board is not even
18 vaguely relevant to the use in practice of that
19 foil facer against a combustible phenolic foam?
20 A. So if we look at (d):
21 "Where the product is to be used over a combustible
22 substrate and the characteristics noted in a) do not
23 apply, then the product should be tested in conjunction
24 with that substrate."
25 But in (a) they do apply.

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1 Q. They do, do they? Was that part of the thinking at the
2 time? Did somebody go through this and say, "Well, (a)
3 is disappplied so I don't have to test it over the
4 substrate"?
5 A. I can't say it was ever pointed out to me.
6 Q. No, so that's an argument.
7 Going back to the left-hand column, where a warning
8 about composites is set out:
9 "The influence of the underlying layers on the
10 performance of the assembly should be understood ..."
11 By testing the foil facer alone, you would not be
12 taking the care that was required to make sure that the
13 underlying substrate had no effect on the test, for good
14 or ill.
15 (Pause)
16 A. Like I say, (d) applies, and so with (d), and (a) not
17 applying, you have to test it on the apparatus backing,
18 which is then the calcium silicate board.
19 Q. Tell me, you did full product low risk tests for sale in
20 Scotland, didn't you? Because this interpretation that
21 you espouse in relation to testing the foil facer only
22 doesn't apply in Scotland.
23 A. That's correct.
24 Q. So did you do full product low risk tests for sale of
25 K15 in Scotland?

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1 A. Historically , yes, but we couldn't achieve that
 2 requirement --
 3 Q. No.
 4 A. -- with the facer on it .
 5 Q. Do I take it from that that , by 2016, you were aware,
 6 whatever the interpretation might allow you to do in
 7 England, you couldn't pass the relevant test for low
 8 risk for sale in Scotland?
 9 A. Yes, that's why we changed.
 10 Q. Did you continue to sell K15 in Scotland?
 11 A. We changed -- we dropped the low risk calling (?) but we
 12 still -- yes, still --
 13 Q. Yes, without saying what risk it was?
 14 A. Not directly , no.
 15 Q. Knowing that you hadn't passed a low risk test?
 16 A. Well, we weren't claiming low risk .
 17 Q. No.
 18 A. So ...
 19 Q. No, but you knew that K15 could not pass and had never
 20 passed a low risk test for use in Scotland, and yet you
 21 were continuing to sell K15 in Scotland.
 22 A. But not as low risk .
 23 Q. Well, as nothing. You didn't describe it one way or the
 24 other, did you?
 25 A. No, not to start with.

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1 Q. Did that not strike you at the time as remarkably
 2 reckless?
 3 A. No. You know, I thought -- we'd checked the testing , we
 4 couldn't apply it , I wasn't prepared to claim it if we
 5 couldn't get the result for it , so we dropped the low
 6 risk classification from it .
 7 Q. Let's look at an email chain from June 2016 where we can
 8 see that you discuss this topic with your technical
 9 team. We will start with {KIN00004168/7}, please. It's
 10 a long email chain, and I would like to show you the
 11 third email up from Reshma Roodurmun to you on
 12 22 June 2016.
 13 Now, just help me, Reshma Roodurmun had what role at
 14 Kingspan?
 15 A. She was in the marketing team.
 16 Q. Marketing team. And she reported to you, did she, by
 17 this stage? Since you were head of marketing, she must
 18 have done.
 19 A. Yes.
 20 Q. She says:
 21 "Although Kingspan Kooltherm K15 Rainscreen Board,
 22 and its rigid thermoset insulation core, are Class 0.
 23 "Hi Adrian, please can you confirm whether we are
 24 still running with the above phrase as regards to
 25 stating that both the product & its core are class 0?

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1 "Thanks
 2 "R."
 3 Do you see that?
 4 A. Yes.
 5 Q. This is June 2016. Do you know what had happened for
 6 Kingspan to consider changing its marketing material in
 7 this respect at this point?
 8 A. I suspect Reshma may have had discussions with the
 9 technical team, maybe with Arron or Dan, and come to the
 10 view that the current testing wouldn't support that
 11 claim. So she's flagged that then to me.
 12 Q. What had led to that? Or rather what discussions or
 13 investigations within the technical team had led to the
 14 view that the current testing wouldn't support a claim
 15 to class 0?
 16 A. I can't recall directly , but it may have been a review
 17 of the literature .
 18 Q. What had caused that?
 19 A. I can't recall , at the time.
 20 Q. You really can't? You were head of technical by this
 21 stage.
 22 A. Yeah.
 23 Q. You had been in that role about a year or more.
 24 A. Yeah.
 25 Q. You can't remember?

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1 A. No, I can't remember exactly what triggered it off .
 2 Q. If we go up the chain to the next email, we can see --
 3 I'm afraid you have to go to the bottom of page 6
 4 {KIN00004168/6} for it -- that it's an email from
 5 Arron Chalmers to Dan Ball, copied to you, the same day,
 6 in response. He says:
 7 "Dan - can you confirm mate that we should remove
 8 the section about the core achieving Class 0?
 9 I remember you saying that solely the core was having
 10 issues achieving Class 0 (I think you said Class 2 in
 11 some rare instances). Not that it's an issue because
 12 you can [in bold and underlined] claim the product as
 13 a whole is Class 0 if the facing of the product has
 14 achieved this - which K15 Lamtec faced has. (see
 15 below)."
 16 Then he sets out the paragraph that I think you're
 17 referring to from ADB; is that right?
 18 A. That's correct.
 19 Q. And that is appendix A, paragraph 13, which says
 20 {KIN00004168/7):
 21 "The highest National product performance
 22 classification fire officer lining materials is Class 0.
 23 This is achieved if a material [and then he has
 24 highlighted the words] or the surface of a composite
 25 product is either;

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1 "a. composed throughout of material of limited
 2 combustibility; or
 3 "b. a Class 1 material which has a fire propagation
 4 index (I) of not more than 12 and a sub index (i1) of
 5 not more than 6.
 6 "Note: Class 0 is not a classification identified in
 7 any British Standard test."
 8 Can you confirm that this is the bit of ADB that you
 9 were referring to when you were explaining just now your
 10 view of the interpretation?
 11 A. Yes.
 12 Q. That's it, is it? Right.
 13 When he came up with this or told you this, were you
 14 not extremely concerned to hear that in some cases the
 15 core of K15 was achieving class 2?
 16 A. That --
 17 Q. If you go back to the previous page {KIN00004168/6} you
 18 can see where he says that.
 19 A. Yeah, I think he said on rare occasions, so obviously it
 20 wasn't a consistent problem. But it's not a consistent
 21 test, it's quite an inconsistent test, if you like, it's
 22 from a very old standard, so we would see fluctuations
 23 in the --
 24 Q. Right. But it didn't bother you?
 25 A. It didn't overly concern me at that point, no.

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1 Q. What about him saying that the core was having, as he
 2 put it, issues achieving class 0? Did that bother you
 3 or not?
 4 A. No, because really the core achieving class 0 is not
 5 that relevant. We claimed it on the core historically.
 6 Q. Yes.
 7 A. But I'm not sure what the relevance of claiming it on
 8 the core was historically.
 9 Q. Well, was that a view at the time, that you thought:
 10 well, it doesn't matter what the core does?
 11 A. No, it wasn't that it didn't matter, just it wasn't
 12 a concern, an over -- a concern.
 13 Q. Were you aware, before Arron Chalmers wrote this email,
 14 that K15's core was having, as he put it, issues
 15 achieving class 0, and on some rare occasions only met
 16 class 2?
 17 A. No, I think it was at this point that it was starting to
 18 be flagged when Reshma picked it up.
 19 Q. Right.
 20 Now, let's scroll up, and we can see that the next
 21 email is from you to him in response, copied to others,
 22 including Reshma Roodurmun:
 23 "Guys
 24 "The decision was made today to remove the reference
 25 to class 0 because I was advised that neither the core

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1 or the film will conform to Class 0.
 2 "It will potentially be damaging to remove it but
 3 not prepared to say we pass if we don't."
 4 "So which is it? Does the facer pass or not?"
 5 Now, you say, "The decision was made today"; who
 6 made that decision?
 7 A. Myself initially in discussions with Reshma, I think,
 8 that she felt we hadn't got the evidence to keep the
 9 claim for class 0. So I said, "Well, if we haven't got
 10 the evidence, then we'll stop claiming it".
 11 Q. Right. But you and Reshma Roodurmun?
 12 A. Yes.
 13 Q. Was that in a meeting or an email exchange?
 14 A. No, I think it might have been in a meeting, because we
 15 were --
 16 Q. Right.
 17 A. -- in the same room.
 18 Q. We've seen no record of that decision, a written record
 19 of that decision.
 20 A. No, that's -- I think that's probably the only record.
 21 Q. Who advised you that neither the core nor the film would
 22 conform to class 0?
 23 A. I think it was Reshma. She'd been talking to -- that
 24 was her interpretation after she'd been talking to the
 25 technical team.

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1 Q. So it's not just the core you're being told about, it's
 2 the film as well?
 3 A. Yes, under that interpretation, yeah, of that --
 4 Q. When you say film, do you mean the --
 5 A. I mean facer.
 6 Q. -- foil facer?
 7 A. Yes.
 8 Q. What test was that a reference to?
 9 A. I don't think it was a reference to a test. I think it
 10 was just reference to a discussion that Reshma had had.
 11 Q. Right. What was the basis of her belief that she was
 12 communicating to you that the film would not conform to
 13 class 0?
 14 A. I don't know, because that actually wasn't correct, that
 15 the facer wouldn't pass, but it was definitely the
 16 impression she had got.
 17 Q. Why do you ask her at the end of your message here,
 18 "Does the facer pass or not?"
 19 A. I'm not asking Reshma, I'm asking the technical team,
 20 Arron and Dan. So this is to them, in response to
 21 Reshma's discussion with me.
 22 Q. I see. So you were told by Reshma that neither the film
 23 nor the core would pass, but is it right that you didn't
 24 understand why it was being said the film wouldn't pass
 25 because, so far as you were concerned, it had? Is that

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1 what we take from this?

2 A. Yeah, I wasn't aware of why it wouldn't, so that's why

3 I put that to the team, to let me know: does it or

4 doesn't it?

5 Q. Right.

6 If, as you said, you knew the core in some cases

7 achieved a class 2, how could you possibly contemplate

8 a class 0 rating for a product based on a classification

9 of the facer alone, or is the answer to that question

10 your interpretation point?

11 A. Yes, it's the interpretation point.

12 Q. Right. So when you sent this email, this message, at

13 17.47, you had had Mr Chalmers' message back to you with

14 the quotation from appendix A of ADB for about

15 four hours that afternoon, hadn't you?

16 A. Yes.

17 Q. Between receiving his message and sending this message

18 to Arron Chalmers back again, did you investigate for

19 yourself the appendix A point and examine the wording

20 and have a think about it?

21 A. No, I probably was busy doing other things, so I sent

22 that to the team to look at. They were far more

23 experienced in the testing to 476 than I was, so

24 I forwarded it to the team.

25 Q. When you sent this message back to Arron Chalmers and

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1 Dan Ball, did you really think that the meaning which

2 Arron Chalmers was teasing out of or extracting from the

3 language of appendix A he was sending you was really the

4 intended meaning?

5 A. It was the literal interpretation, from my perspective.

6 Q. But did you think it was the intended meaning?

7 A. I don't think I just considered the intended meaning,

8 I think it was just a literal interpretation of it.

9 Q. Right. So you didn't stop and ask yourself, "Well,

10 although I think it literally says this, it can't

11 possibly mean this"? You don't stop and have those

12 thoughts?

13 A. No.

14 Q. Is that because you saw this literal interpretation as

15 a useful tool?

16 A. Yeah, obviously it had been relied on previously and

17 I thought it was a legitimate interpretation.

18 Q. It had been relied on previously by whom?

19 A. By Kingspan.

20 Q. And you thought it was a legitimate interpretation, even

21 though you didn't consider whether it was an intended

22 interpretation?

23 A. Yes.

24 Q. Further up the chain, we can see the same day Dan Ball

25 responds to you, and I'm afraid you will have to go back

98

1 over to page 5 {KIN00004168/5} for this email, but it's

2 quite a long one, and it comes to you in the first

3 instance, and actually it ends with a question, "What do

4 you think Ade?" So this is directly asked of you by

5 Dan Ball, same day, just after 8 o'clock that evening.

6 The email comes to you and Mohammad Asif Irfan. Who

7 is Mohammad Asif Irfan?

8 A. He was somebody we had taken on who was doing a fire --

9 a Master's in fire performance.

10 Q. Right.

11 It's copied to Adrian Brazier and Reshma Roodurmun,

12 and he says:

13 "Who told you that Ade? Core thats correct but not

14 facing. Thats a true statement for k7/k12/k8/k108. But

15 the lamtec 25micron I have done both tests recently on

16 perf and non perf and have class 0 summary reports on

17 both 25micron lamtecs. Mo what was the result on the

18 black 18micron lamtec that you tested a couple of months

19 ago? I know the BRE are slow but it's a couple of

20 months ago that you sent it to them now isn't it?

21 Possibly longer. BRE are better but they are so slow

22 aren't they? If you haven't heard Shelia should be able

23 to tell you over the phone. If we can get the summary

24 report on that as well as the ones I have on the

25 25micron, anything with those facings we can state are

99

1 class 0 or state a class 0 facing to the product.

2 "The section in part B does state you can claim they

3 are class 0 because of the facing/composite layer. We

4 don't have to say it's because of the facing if we don't

5 want to but of course thats a choice."

6 Did you understand Mr Ball from that to be

7 suggesting that you could choose to decide to claim

8 class 0 for a product based on a class 0 test on the

9 facer alone and then not reveal that the test was on the

10 facer only?

11 A. Yes, I think that's what he's saying there.

12 Q. Then if we follow on with that to see what happens next,

13 if we go up page 5 {KIN00004168/5}, just above

14 Dan Ball's email, this is now the next day, early in the

15 morning, 8.40, 23 June 2016. Reshma Roodurmun writes to

16 Dan Ball and you and Mo, copied to Adrian Brazier, and

17 there's a series of bullet points. The third bullet

18 point is in bold -- sorry, I should show you the second

19 bullet point:

20 •" Based on the facer facilitating a Class 0

21 (England & Wales), and to be technically correct, the

22 statement I have run with is:

23 •" Kingspan Kooltherm K15 Rainscreen Board is

24 Class 0 as defined by the Building Regulations.

25 •" Without the Class 0, we would have no product for

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1 that application .
 2 •" If in the future, the core achieves Class [0] all
 3 by itself , [then] we will revert to the following
 4 statement:
 5 •" Kingspan Kooltherm K15 Rainscreen Board and it's
 6 rigid phenolic insulation core is Class 0/Low Risk as
 7 defined by the Building Regulations/[Standards]."
 8 What did you make of that message as head of
 9 technical and marketing?
 10 A. I thought it was an accurate way to describe the
 11 performance of the product, the difference between the
 12 building regs and the Scottish standards.
 13 Q. It didn't occur to you that that was an utterly
 14 disingenuous and opportunistic interpretation?
 15 A. No.
 16 Q. But it's right, isn't it -- well, actually, is it right?
 17 Is it right that you would have no product without
 18 class 0?
 19 A. No, I don't think so.
 20 Q. But in the over-18-metre market, you wouldn't be able to
 21 use this without class 0, would you?
 22 A. No. For the insulation, the class 0 element's not
 23 relevant. It's relevant for the cladding material.
 24 Q. That's a different question.
 25 A. Yes.

101

1 Q. Whatever you would need class 0 for above 18 metres --
 2 not as part of the cladding, I understand that -- you
 3 would still need class 0 over 18 metres. It does have
 4 an application over 18 metres, doesn't it?
 5 A. Not for the insulation .
 6 Q. Well, we can argue about that until the cows come home.
 7 Didn't you think at the time that testing the facer
 8 alone and then claiming class 0 for Kingspan K15 as
 9 a product was misleading?
 10 A. No, I didn't.
 11 Q. Why is that?
 12 A. Because it was an interpretation of ADB.
 13 Q. How would any buyer of K15 know that you had adopted
 14 that interpretation and tested to class 0 only the
 15 foil facer and not the entire product?
 16 A. Only by defining it as defined by the
 17 Building Regulations, that --
 18 Q. You think that was it, was it, those words, "as defined
 19 by the Building Regulations"?
 20 A. That would be it, yes.
 21 Q. Did you really honestly think at the time that by using
 22 those words, you were signalling in clear terms to
 23 a buyer of K15 that you had only tested the foil facer
 24 and not the entire composite product?
 25 A. No, I don't think I would have.

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1 Q. No. So any buyer of K15 being told it was class 0 would
 2 not know, would they, that they were buying a product in
 3 respect of which only the foil facer had passed
 4 a class 0 test?
 5 A. No, but they'd know that a product was class 0 by the
 6 definition of the Building Regulations.
 7 Q. So was it really your thinking at the time that a buyer
 8 of K15 would look at your class 0 designation and work
 9 out that you had only tested the foil facer by reference
 10 or cross-reference to paragraph 13 of appendix A of
 11 Approved Document B?
 12 A. No, they would just need to know that it was correctly
 13 described as class 0.
 14 Q. Had you any reason to think that the entire market
 15 shared the interpretation of Approved Document B that
 16 Arron Chalmers had come up with early in the afternoon
 17 of 22 June 2016?
 18 A. Had I any reason to believe ...?
 19 Q. That the market shared Arron Chalmers' interpretation of
 20 the Building Regulations that he had come up with or
 21 identified early in the afternoon of 22 June 2016.
 22 A. I'm not sure whether the market ...
 23 Q. No.
 24 A. ... what other people were doing with their class 0
 25 testing in response to ADB.

103

1 Q. Put it this way: you weren't aware, were you, at the
 2 time of a generally held view that the interpretation of
 3 ADB which Arron Chalmers was putting forward was one
 4 widely shared in the market?
 5 A. No, I wasn't.
 6 Q. Moving up, we can see what happens next. Second email
 7 down on the page, page 5, Dan Ball to Reshma Roodurmun
 8 and to you, and to Mo Asif Irfan, Adrian Brazier and
 9 Adam Heath:
 10 "That first statement of yours is perfect Resh and
 11 should always stay like that we shouldn't revert to the
 12 second one as its not [referring] to the product as
 13 placed on the market. That first statement of yours is
 14 spot on."
 15 You see that?
 16 A. Yes.
 17 Q. If we then go to the next email up, this is from
 18 Mohammad Asif Irfan, and it starts at the bottom of
 19 page 4 and goes to the top of page 5. He says that he
 20 has tested a black Lamtec 18-metre facing and achieved
 21 class 0 -- I'm paraphrasing what he says there -- and
 22 then he says underneath the fire propagation index and
 23 sub-indices:
 24 "Since the fire propagation is well below 6, the
 25 facer is clearly a class 0 product."

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1 He then says underneath that:
 2 "Now the only question I have with regards to
 3 getting the entire K15 (40mm) product tested is there
 4 any point in doing that? ADB vol.2 clearly states as
 5 long as the surface of the product is class 0 the entire
 6 product can be stated to be class 0.
 7 "I'm sure we can allocate those finds to some other
 8 testing ..."
 9 That's what he says.
 10 If we go further up page 4 {KIN00004168/4} to
 11 Dan Ball's email above that on 23 June, copied to you,
 12 at 12.57, he says:
 13 "We don't have to test the product as a whole to get
 14 class 0 quite right and we can claim it legitimately
 15 now, would just be interesting to see if there is any
 16 difference between testing facing and product as placed
 17 on market. Be good to see if that K7 got a class 1 at
 18 least as we claim. But as we got a euroclass F it would
 19 be a surprise. That's good about the black lamtec."
 20 Now, it seems, looking at these three emails, that
 21 what's going on here -- is this right? -- is that your
 22 team, with you looking on, knew that they couldn't
 23 achieve class 0 for K15 as a product, as a composite
 24 product, but could get class 0 for the foil facer, but
 25 then suggest that K15 could be marketed as a class 0

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1 product based only on the foil being class 0?
 2 A. Correct.
 3 Q. But the legitimacy of that approach rested on
 4 a particular interpretation of paragraph 13 of
 5 appendix A that we had seen earlier in the emails.
 6 A. Yes.
 7 Q. And you knew of no widespread adoption of that in the
 8 industry, as you have told us.
 9 Did you know at the time of any of your competitors
 10 honestly adopting that interpretation?
 11 A. No, I don't think so.
 12 Q. So from your perspective, you would have understood that
 13 this interpretation was entirely novel.
 14 A. Oh, no. I mean, it was a plain potential
 15 interpretation. So they could have been, but I wasn't
 16 aware whether they were or not.
 17 Q. Did you stop to consider how such an interpretation
 18 could possibly make any sense?
 19 A. In terms of that particular test, one of the problems
 20 with that test, when you're trying to test a composite
 21 product, particularly with a foil facer, is the facer
 22 itself can delaminate from the product and then touch
 23 the burner element and affect the test. So it's quite
 24 an unreliable type test for insulation materials. It
 25 was really, as I believe, designed for internal linings,

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1 more plasterboard-type products, and so I think it --
 2 based on that experience, then to take that element out
 3 of the test and just test the facer gives you a more
 4 reliable result on the test than it would with just the
 5 facer delaminating and affecting the burner.
 6 Q. What I would suggest to you that these emails show thus
 7 far is the evolution over some two days in June 2016 of
 8 a plan to sell K15 on the basis of a claim that it was
 9 a class 0 product knowing that only the surface could be
 10 described as such, and then to justify that statement by
 11 reference to a novel and unverified meaning of ADB that
 12 you had not verified outside the business.
 13 Do you accept that as a fair summary of what was
 14 going on here?
 15 A. I don't think it was a novel interpretation. The
 16 business had used that interpretation for quite some
 17 time, so it wasn't novel to Kingspan. Whether it was
 18 novel in terms of competition, I wouldn't know.
 19 Q. Well, you see, this is about life safety, isn't it?
 20 Class 0 is about saving lives, ultimately, isn't it?
 21 A. Well, it's about small-scale fire performance.
 22 Q. Yes, but the point of doing the tests is to make sure
 23 that there aren't fires in which people are either
 24 injured or die or lose their property.
 25 A. Potentially, yes.

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1 Q. Well, you seem to be having trouble with that
 2 proposition.
 3 Let's take a step back. Approved Document B and --
 4 A. Yes.
 5 Q. -- indeed part B of the Building Regulations is about
 6 fire, isn't it?
 7 A. That's correct.
 8 Q. And the reason why constructions are regulated -- and
 9 I'm sorry if this sounds patronising, but I just want to
 10 be sure you are really grasping this -- is to stop
 11 buildings being dangerous.
 12 A. That's correct.
 13 Q. And the class 0 test was part of that regime.
 14 A. Yes.
 15 Q. So it was not potentially part of life safety; it was
 16 actually an important element in construction regulation
 17 to protect lives.
 18 A. Yes.
 19 Q. Yes. And yet here you are deciding to adopt
 20 an interpretation of the guidance in Approved Document B
 21 which was literal, and which you had no reason to
 22 believe was shared in the industry, either by buyers or
 23 your competitors; yes?
 24 A. Correct.
 25 Q. Was that not an extremely dangerous thing for you to do?

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1 A. No, I don't think it was. I think because of, like
 2 I say, the test, it's difficult to test an insulation
 3 material with a facer because it delaminates, and so
 4 I think it was a fair interpretation of it to test the
 5 facer, which is what would come in contact with the
 6 actual fire.
 7 Q. If it was a fair interpretation, why not simply say in
 8 your marketing literature and in the relevant
 9 certificates under which it was sold that the foil facer
 10 had achieved class 0?
 11 A. I would agree that would be clearer.
 12 Q. Well, it wouldn't just be clearer. I would suggest to
 13 you that the reason you didn't do that was because you
 14 knew very well that that would immediately provoke
 15 questions as to whether K15 had passed a class 0 test,
 16 and you couldn't answer that question with the answer
 17 yes, could you?
 18 A. You could, because you could revert it to the standard.
 19 So we could have described it that way and reverted to
 20 the standard and its description.
 21 Q. By selling Kingspan K15 having passed only a class 0
 22 test successfully in relation to the foil, you were
 23 misleading, and deliberately misleading, the market.
 24 A. No, I don't agree with that.
 25 Q. And anybody who read the class 0 certificate for

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1 Kingspan K15 was not told that it didn't apply to the
 2 whole product but only a part of it, and they would have
 3 no means of knowing that; do you not accept that?
 4 A. If somebody had have asked for the class 0 test, we'd
 5 have provided them with the facer test.
 6 Q. So you were prepared to say that the product passed
 7 class 0 but, when asked, would reveal the truth; is that
 8 how it worked?
 9 A. We'd reveal -- "reveal"; we would provide the test
 10 report to substantiate that interpretation.
 11 Q. This is a thoroughly dishonest and disingenuous way of
 12 carrying on business, isn't it?
 13 A. No, I don't think it is.
 14 Q. And it's playing fast and loose with life safety
 15 regulation.
 16 A. No, not at all.
 17 Q. Let's look at a few more emails in this run. I am going
 18 to paraphrase the next few, but if you go up from page 4
 19 to page 3 {KIN00004168/3} and then run up page 3, you
 20 can see what happens. I'm going to summarise it, and
 21 I hope accurately, but tell me if this is wrong.
 22 Effectively Reshma Roodurmun asks what should be written
 23 for the classification for the Scottish market, and
 24 Dan Ball is keen to test the core of K15, and if we go
 25 to Arron Chalmers' email in the middle of page 3 there,

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1 he says on 23 June:
 2 "I don't see any issues with stating that Kooltherm
 3 K15/K10/K9 is designated as 'Low Risk' in accordance
 4 with the Scottish Technical Handbook as
 5 "Section 2.E.1 it states the designer is free to
 6 choose a product that satisfies a BS Test OR a European
 7 one until such a time as the BS classifications are
 8 withdrawn. Low Risk materials are designated as such
 9 should the surface material basically achieve Class 0 as
 10 highlighted in ADB2. We don't achieve a B to Euroclass
 11 which does muddy the water slightly, but it does state
 12 you are free to choose a product that satisfies either,
 13 not [necessarily] both."
 14 Can you explain what Arron Chalmers is saying here?
 15 A. No, it doesn't make sense to me.
 16 Q. No, and you were copied in on that email. Did you go
 17 back to him and say, "I'm sorry, Arron, I can't
 18 understand what you're talking about, could you just
 19 explain"? We don't see that happen.
 20 A. No, I don't think so.
 21 Q. No. Why is that?
 22 A. I think I was just looking to see what the rest of the
 23 team would say on that.
 24 Q. Right.
 25 A. I think my view was the standard -- the technical

111

1 handbook interpretation was different.
 2 Q. Right.
 3 Then we go up one to Dan Ball's email to
 4 Arron Chalmers. Again you're copied:
 5 "I agree with Arron. We can show it's class 0. And
 6 in the mean time get 40mm k15 tested see what occurs.
 7 The only reason it would fail when the facing passes is
 8 if pentane release through the perforations causes a
 9 fail but I'm optimistic."
 10 Just on that point, that rather undermines, doesn't
 11 it, the argument that you have come up with that
 12 actually the perforations wouldn't have made any
 13 difference in an 8414 test, because actually they would
 14 have made a difference in this test?
 15 A. No, I think it still supports that argument, because
 16 this is a very small-scale test on a very small product
 17 with a very low fire output.
 18 Q. If we go to the email from Arron Chalmers at the bottom
 19 of page 2 {KIN00004168/2}, the same day, 23 June 2016,
 20 at 17.58, he says, and again you're copied:
 21 "Right, all agreed it's definitely Class 0 so
 22 include the product is Class 0 in the document. I'll
 23 email Frans Paap and gauge his views on whether we can
 24 claim low risk at present without a full product test.
 25 If so, we'll have to leave that bit out for the time

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1 being and just add it as an update in the future.”
 2 Dan Ball comes back and says:
 3 “Agreed. Mate send him a smoke density at the same
 4 time [et cetera] ... I can’t get at them here. Just to
 5 see if he can say if it’s low or not. If he doesn’t
 6 know no one will and we can just remove the old
 7 statement.”
 8 Then Dan Ball’s response on -- sorry, I’m jumping
 9 ahead. If we go to Arron Chalmers’ response up the
 10 chain at 27 June, 10.03, page 1 {KIN00004168/1}, he says
 11 at the bottom of the page, again you’re copied:
 12 “Frans has said that a smoke density figure of
 13 around 100 is low.”
 14 Et cetera, et cetera, and if we go over to page 2
 15 {KIN00004168/2}, he says under the text box there:
 16 “With regards to the Class 0/low risk - he believes
 17 that we should test the complete product before we can
 18 claim anything as the foam behind the foil is likely to
 19 have a bearing on the facing performance.”
 20 Now, there it is in black and white from Frans Paap,
 21 a fire engineer at Exova, that for classification to
 22 either class 0 or low risk, the complete composite
 23 product should be tested, and he gives a reason: the
 24 foam behind the foil has a bearing on the facer
 25 performance.

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1 At the time, did that not strike you as the correct
 2 advice, and obviously so?
 3 A. No, I think because higher up he said it’s a valid
 4 interpretation, but not one that he would take, but he
 5 thought was an interpretation.
 6 Q. Never mind interpretation. We’ll come to show you the
 7 full run, I assure you of that. But just looking at the
 8 advice that Arron Chalmers is passing on to you that he
 9 got from Frans Paap at Exova, the foam behind the foil
 10 is likely to have a bearing on the facing performance.
 11 You had no reason to disagree with that as a matter of
 12 science, did you?
 13 A. No.
 14 Q. Was that not a good point to jump into this chain and
 15 tell those in the technical department that they should
 16 stop trying to come up with clever ways through ADB and
 17 just test the whole product to class 0 as Exova had
 18 advised?
 19 A. Potentially, but I took the view we could still take the
 20 interpretation from ADB.
 21 Q. Against the advice from an independent fire engineer at
 22 Exova?
 23 A. Frans Paap also says it is a valid interpretation as
 24 well.
 25 Q. Yes, we’re going to come to that in just a moment.

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1 On the advice you get at this point, you see that
 2 Frans Paap is telling you that you should test the
 3 complete product before you can claim anything because
 4 the foam behind the foil is likely to have a bearing on
 5 the facer performance. You have told us that there is
 6 no scientific reason to dispute that.
 7 Given that, at that moment, why not just tell your
 8 team to test the whole product?
 9 A. Because this was part of that whole discussion, so it
 10 wasn’t just this moment that I was considering, there
 11 were the other communications as well.
 12 Q. You didn’t know what was coming next, did you?
 13 A. No, but it was shortly after then, so I wouldn’t have
 14 made an immediate decision.
 15 Q. Yes, so why at that moment, as soon as you see an
 16 external fire engineer telling you, through
 17 Arron Chalmers, what we see here, didn’t you go in and
 18 say, “Come on, we need to test the whole product”?
 19 A. I was still considering the views of the team and
 20 keeping the conversation going, but ...
 21 Q. Right.
 22 Let’s look at the response that comes from Dan Ball
 23 then over the page on page 1 {KIN00004168/1}. This is
 24 the second email from the bottom on that page, so
 25 two-thirds of the way down page 1, Dan Ball, 27 June.

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1 Again, you’re copied:
 2 “I spoke with Frans about this as well.”
 3 He says “as well” because it appears that
 4 Mr Chalmers had also had a discussion with Frans Paap.
 5 He says:
 6 “We are okay claiming class 0 from foil as it can be
 7 interpreted like that. He’s just got to take the fire
 8 engineer perspective and cover himself and give the
 9 conservative point of view, ideal situation, product as
 10 placed on market but we can interpret class 0 from the
 11 face as shown in ADB. It’s just we are doing what we
 12 attacked competitors for doing but low risk in Scotland
 13 words it with substrate, we do have an old report but
 14 needs updating. He feels we should test complete for
 15 low risk statement.”
 16 Et cetera, et cetera.
 17 A. Yes.
 18 Q. Then in the last sentence, Dan Ball says:
 19 “Low risk we could do with a 40mm k15 being tested
 20 in a UK test house. Or thinner if we have one. So
 21 should try a 40mm k15 max.”
 22 Now, it looks from that that Dan Ball has pressed
 23 Exova with his interpretation, the literal one that you
 24 have espoused earlier in your evidence today, and got
 25 an approval, but a caveated one.

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1 A. Correct.
 2 Q. Is that how you saw it at the time?
 3 A. Yes.
 4 Q. So you would have known that this interpretation of ADB
 5 that you were discussing adopting was open to you as
 6 a matter of language, but not conservative and not
 7 ideal?
 8 A. Yes, not conservative, yes.
 9 Q. Do you accept, leaving aside the tenability of the
 10 interpretation, that Kingspan and you, yourself,
 11 personally were prepared to sell K15 on the basis of
 12 a class 0 representation based on a view of Approved
 13 Document B that was not conservative and not ideal?
 14 A. Yes.
 15 Q. If it was not conservative and not ideal, it would be,
 16 it would follow, less safe.
 17 A. Not necessarily, but I'll take the point.
 18 Q. Do you agree with me?
 19 A. It wouldn't necessarily mean it's less safe, but I'd
 20 take your point that --
 21 Q. Riskier. Would you be happy with riskier? It would be
 22 riskier to take the less conservative, not ideal
 23 approach.
 24 A. Arguably, yes.
 25 Q. Well, what's the argument?

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1 A. Because each fire or incident would have different
 2 effects on the product, and just by, you know, testing
 3 a small sample of the product, either with or without
 4 the facer, is just an indication of how the product
 5 would perform in a very small-scale event. But most
 6 fires develop much more than that, and so I think the
 7 difference between the facer on and the facer off it
 8 would arguably have a less significant effect, but
 9 I take the --
 10 Q. Why not adopt the safer, conservative, ideal approach
 11 that Frans Paap had indicated to Dan Ball?
 12 A. Because we were happy with the interpretation of ADB.
 13 Q. Does this exchange tell us, Mr Pargeter, that you were
 14 prepared to exploit a perceived ambiguity or literal
 15 interpretation in Approved Document B in order to make
 16 sales?
 17 A. I wouldn't say exploit, I would say interpret.
 18 Q. Take advantage of?
 19 A. Interpret the literal meaning.
 20 Q. All right. I'll try the question again with your
 21 preferred word: does this exchange tell us that you were
 22 prepared to interpret ADB in a particular way in order
 23 to make sales?
 24 A. Yes, that would be true.
 25 Q. And that particular way was less safe, less conservative

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1 and not ideal?
 2 A. Potentially, yes.
 3 Q. Even though that interpretation might place lives at
 4 greater risk than adopting the interpretation or the
 5 approach that Frans Paap was advising?
 6 A. I don't think it does place lives at greater risk.
 7 MR MILLETT: I'm looking at the clock, and I have one or two
 8 questions on this.
 9 SIR MARTIN MOORE-BICK: We haven't finished this document,
 10 have we?
 11 MR MILLETT: No, that's why.
 12 SIR MARTIN MOORE-BICK: Perhaps we should.
 13 MR MILLETT: Thank you.
 14 A little bit lower down the email in the third line,
 15 you are told by Dan Ball:
 16 "It's just we are doing what we attacked competitors
 17 for doing ..."
 18 What's that a reference to?
 19 A. I don't recall. It might have been some historic issue.
 20 I don't know what we did there.
 21 Q. Did you ask him? Were you not interested to know what
 22 it was that Kingspan had deprecated in the past but what
 23 it was now proposing to do?
 24 A. No, I didn't.
 25 Q. Why is that?

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1 A. I didn't -- it just didn't occur to me to do that.
 2 Q. Did it not occur to you at the time, even on what little
 3 you were told by Dan Ball, that here was Kingspan
 4 attacking its competitors in the past for testing the
 5 foil facer and presenting the product as class 0, when
 6 you were now proposing to turn 180 degrees and do the
 7 same?
 8 A. It didn't, no.
 9 Q. Was there any point during this email run where you
 10 thought you should end the conversation, reprimand staff
 11 who had suggested misleading marketing material and
 12 marketing K15 with fire standards that the product
 13 couldn't achieve, arrange an immediate team meeting and
 14 educate people, if not discipline them? Did that not
 15 occur to you?
 16 A. No, it didn't.
 17 Q. And you were perfectly happy to go along with this
 18 because it would be able to increase your --
 19 A. I thought the interpretation was a fair interpretation.
 20 Q. Let's go back to the email chain we're nearly at the top
 21 of. The second email down is from Arron Chalmers,
 22 27 June 2016, 11:42:
 23 "Yeah, does seem a bit of a cheat though doesn't it
 24 claiming Class 0 for just a facer test, when as you said
 25 it's meant to be product as placed on the market. But

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1 like everything in ADB it depends who is interpreting
2 the wording - like the whole K15 issue and whether
3 filler material includes the cladding. If a fire
4 engineer believes the core will affect the facing
5 performance though should we be claiming Class 0 based
6 off facer performance alone if 40mm K15 then fails to
7 get Class 0?"

8 Now, at this point, as we see just above that:

9 "Perhaps it would be better if you had a meeting to
10 discuss this matter verbally."

11 And that's from Reshma Roodurmun to all of you, and
12 then the email chain runs out.

13 My first question is: did you actually continue that
14 conversation verbally, as she puts it, rather than in
15 writing?

16 A. We may have done. I think we may have got together and
17 just agreed what we would do going forward.

18 Q. Was the reason why it was suggested that you should have
19 a meeting to discuss the matter verbally that you didn't
20 want a written record of the discussions?

21 A. No, I think it was just getting a long email chain
22 and ...

23 Q. Right.

24 Now, when Arron Chalmers says, "Yeah, does seem
25 a bit of a cheat though doesn't it", he was right about

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1 that, he had put his finger on it.

2 A. I don't think it was a cheat. I mean, Arron had
3 originally suggested it as an interpretation. But
4 I don't think it was a cheat; it was just a literal
5 interpretation of ADB.

6 Q. Yes, but he says, "a bit of a cheat though doesn't it
7 claiming Class 0 for just a facer test". It is right,
8 isn't it, it is a bit of a cheat?

9 A. It's an interpretation.

10 Q. Well, it's a bit of a cheat. It's cheating. And it's
11 cheating because you know very well that's not what the
12 people who put together Approved Document B meant, but
13 you were taking advantage of a clever-clogs reading of
14 it to try to sell product.

15 A. I don't think it was a clever-clogs reading of it; it
16 was how it was written.

17 Q. Do you accept what he says here in the last sentence,
18 that if a fire engineer believes the core will affect
19 the facing performance, should you be claiming class 0
20 based off facer performance alone? That was a serious
21 question and required a serious answer.

22 A. Yeah, on reflection, I do.

23 Q. Why didn't you realise that at the time?

24 A. I think I was just relying on that interpretation that
25 I'd got.

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1 Q. The reality, Mr Pargeter, is that you knew jolly well at
2 the time that the approach was less ideal, not
3 conservative and a bit of a cheat. So was your attitude
4 at the time that any weakness in fire safety legislation
5 was essentially fair game to be taken advantage of in
6 order to make sales?

7 A. No, not at all.

8 Q. That's not how you saw it?

9 A. No.

10 Q. Is there any other explanation for adoption of the less
11 conservative, less ideal approach?

12 A. Other than the test itself being not ideal tests for
13 testing insulation products, it wasn't designed for
14 that.

15 Q. You say in your third witness statement -- just for the
16 transcript, it's paragraph 3.49 on page 31
17 {KIN00022610/31} -- having set out these discussions and
18 interpretation, that you still stand by the decision
19 today. That was in September this year.

20 Are you telling us that, even though you knew at the
21 time this interpretation was being explained or
22 characterised to you by your staff, your technical
23 staff, as a bit of a cheat, you would still make the
24 same decision today?

25 A. I think it was a fair interpretation of ADB.

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1 Q. Would you make the same decision? You still think it
2 was a fair interpretation, do you?

3 A. Yes, I do.

4 Q. And you would make the same decision today, would you,
5 only to test the foil but to present the whole product
6 as class 0?

7 A. I think what I would do today is probably make it clear
8 in the literature that that's what we'd tested.

9 MR MILLETT: Mr Chairman, is that a convenient moment?

10 SIR MARTIN MOORE-BICK: Yes, I think it is.

11 Well, we'll have a break there for some lunch.

12 We'll come back at 2.10, please, and, again, please
13 don't talk to anyone about your evidence while you're
14 away. All right?

15 Thank you very much.

16 (Pause)

17 Right, 2.10, then, please. Thank you.

18 (1.10 pm)

19 (The short adjournment)

20 (2.10 pm)

21 SIR MARTIN MOORE-BICK: Right, Mr Pargeter, ready to carry
22 on?

23 THE WITNESS: I am.

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

25 Yes, Mr Millett.

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1 MR MILLETT: Thank you, Mr Chairman.
 2 Mr Pargeter, can we now please go to {KIN0007445}.
 3 I'm hoping what appears is a redacted version of this
 4 document, and I only need to look at the first part of
 5 it.
 6 This is an instant messenger chat between two of
 7 your technical team, Peter Moss and Arron Chalmers.
 8 It's linked, as you can see from the very top of the
 9 page, to an email from Peter Moss to himself on
 10 9 November 2016, so this is during your tenure as head
 11 of marketing and technical, "Conversation with
 12 Peter Moss".
 13 It's quite difficult to read, so bear with me, but
 14 it says at 16.30, Peter Moss, "Maaaaaate". Then
 15 underneath that he says:
 16 "Has Class 0 fire performance throughout the entire
 17 product in accordance with BS 476' which alternatives
 18 can we propose?"
 19 Arron Chalmers comes back:
 20 "Class 0 board.
 21 "K15 or K10."
 22 Peter Moss:
 23 "And k110?"
 24 Arron Chalmers:
 25 "Well yeah the solstice alternatives .

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1 "Not K5 anymore tho."
 2 Peter Moss:
 3 "Cool cool thank GOD I got it right."
 4 Arron Chalmers:
 5 "All in the facing my friend."
 6 And there is a smiley face. Peter Moss:
 7 "Yeah he wanted to use K7 and I said only
 8 K10/K110/K15 are comparable whereas K7 has a class 1
 9 surface spread of flame but not a 'class 0' product."
 10 Arron Chalmers:
 11 "Doesn't actually get class 0 when we test the whole
 12 product tho.
 13 "LOL!"
 14 Peter Moss:
 15 "WHAT.
 16 "We lied?
 17 "Honest opinion now.
 18 "dw."
 19 Arron Chalmers:
 20 "Yeahhhh.
 21 "Tested K15 as a whole - got class 1.
 22 "Wheyy.
 23 "lol."
 24 Peter Moss:
 25 "Wheyy.

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1 "Shit product.
 2 "Scrap it."
 3 Arron Chalmers:
 4 "But England/Wales is worded in such a way that it
 5 'implies' the facing can give you class 0.
 6 "Scotland is written better, therefore our product
 7 is not class 0 in Scotland haha
 8 "But dont tell anyone that."
 9 Peter Moss:
 10 "What like the literature
 11 "Fire Performance
 12 Kingspan Kooltherm K110 is Class 0.
 13 "Ha ha.
 14 "Fire Performance.
 15 "Kingspan Kooltherm K110 is Class 0.
 16 "Woops
 17 "Fire Performance
 18 "Kingspan Kooltherm K15 is Class 0
 19 (non-combustible)."
 20 Arron Chalmers:
 21 "What K15 doesn't say that?!"
 22 Peter Moss, over the page {KIN00007445/2}:
 23 "WHEY
 24 "Look who knows their shit."
 25 Arron Chalmers:

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1 "Yeah all lies mate."
 2 Peter Moss:
 3 "Just tickling your balls mate."
 4 Arron Chalmers:
 5 "So is class 1 on K7/k12/8
 6 "Dan got class 2
 7 "I'm retesting to hope."
 8 Peter Moss:
 9 "Fire Performance
 10 "Kingspan Kooltherm K7 Pitched Roof Board is
 11 Class 1."
 12 Arron Chalmers:
 13 "BALLS!
 14 "Alls we do is lie in here."
 15 Peter Moss:
 16 "Aye."
 17 And then it goes on, and then it turns into
 18 a personal question which thankfully has been redacted.
 19 Now, I've shown you that because, although it's not
 20 particularly literary, it's certainly clear as to what
 21 it's saying.
 22 Is this what your own technical team thought of the
 23 bit of a cheat about how to present class 0 on K15?
 24 A. I mean, reading that, it's certainly not the view that
 25 they espouse externally, and it's very disappointing to

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1 read that from my perspective.
 2 Q. But when he says on page 2, does Mr Chalmers, "All we do
 3 is lie in here" -- I mean, these messages were clearly
 4 never meant to see the light of day, but when he says
 5 that, it was, I have to put to you, a true, if pithy,
 6 summary of Kingspan's culture at the time.
 7 A. I don't believe that's true at all.
 8 Q. That was what was happening in your technical department
 9 under your tutelage?
 10 A. No, I disagree with that absolutely.
 11 Q. You had been in charge of this department for some two
 12 and a half years by this point; how do you account for
 13 this attitude to occur? And it's not just the attitude
 14 or the tone of the discussions; people I think would
 15 find that less shocking than actually what they were
 16 talking about. How can you explain that?
 17 A. I can't, because that's not a culture that I endorse or
 18 foster at all.
 19 Q. Do you accept that a culture of lying about the
 20 fire safety of products is particularly serious, because
 21 you're taking risks with people's lives and the safety
 22 of their homes?
 23 A. Yeah, I don't believe that we are lying. I think that
 24 they've ... I can't explain why they're describing it as
 25 such in that way between the two of them.

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1 Q. There is no major difference, is there, other than
 2 perhaps a difference in tone, between what they're
 3 talking about and the "a bit of a cheat" email that
 4 Arron Chalmers sent to you, is there?
 5 A. Oh, I think there is. I think this is a very different
 6 approach, if you like. It's not the same as what they
 7 espouse externally.
 8 Q. Let's look at your second witness statement at
 9 paragraph 3.18 on page 10 {KIN00020824/10}, please.
 10 It's quite a long paragraph, and we've seen some of it
 11 before, I think, about the differences between England
 12 and Scotland.
 13 I would like to pick it up at halfway down the page
 14 where it says:
 15 "These test results ..."
 16 You're talking about results for BS 476-6 and 7.
 17 You say:
 18 "These test results also impacted on our Class 0
 19 status in England and Wales because we were relying on
 20 the same composite test results to Claim Class 0 in
 21 England and Wales. However, as the definition for
 22 Class 0 in England and Wales is different to 'low risk'
 23 in Scotland (as set out above in paragraphs 3.16 and
 24 3.17) as it allows the surface of a composite product
 25 (such as K15) to be tested, the foil facer was tested

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1 separately and achieved the requirements of Class 0. In
 2 order to reflect these changes in what part of the
 3 product had been tested, Kingspan updated the K15
 4 product literature in October 2017 to define its Class 0
 5 status as 'achieves Class 0 as defined in Approved
 6 Document B in England and Wales.'
 7 Now, were the tests that you're referring to the
 8 tests done by Dan Ball in 2016 in which he couldn't
 9 achieve the required propagation index for K15?
 10 A. The tests in 2016 were on the facer, so I think the
 11 tests on the product may have been earlier than that.
 12 Q. Right.
 13 Did you know that in August and September 2016 there
 14 was discussion internally about the part 6 and 7 tests
 15 up to that point?
 16 A. In August 2017 --
 17 Q. 2016.
 18 A. 2016, yes, yes.
 19 Q. Let's look at that. It's {KIN00004213}, please, and I'm
 20 going to come back to the wording of the certificate
 21 later, but if you look at this email run, this is
 22 an email chain in late August/early September 2016, and
 23 if we look at page 2 {KIN00004213/2} at the start of the
 24 chain, it starts with Stacey Deeming at Exova sending
 25 Dan Ball the results on the BS 476-6 and 7 tests so far.

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1 You can see that if you look at the second email
 2 from the bottom in the middle of stage 2, which is just
 3 above the Stacey Deeming email, Dan Ball sends these to
 4 you. Do you see that?
 5 A. Yes.
 6 Q. Perhaps, just to be fair to you, we need to see the
 7 whole of the Stacey Deeming email. She says:
 8 "Hi Dan
 9 "As I thought, the testing has at the minute been
 10 suspended and held at the indicative stage as a result
 11 of poor Part 6 results on the first specimens. The
 12 results obtained so far are as follows ..."
 13 Then she sets them all out, "Product ref:
 14 Kooltherm K15", and that goes over the page to page 3
 15 {KIN00004213/3}, where she says:
 16 "Currently indicating a Class 1 result is possible."
 17 The rest is for K5.
 18 Then at the end, she says:
 19 "Please can you confirm how you wish for us to
 20 proceed with this testing? Do you wish for us to
 21 complete any of the testing, or stop the testing at this
 22 indicative stage?"
 23 Do you see that?
 24 A. Yes.
 25 Q. Now, if we go back to page 2 {KIN00004213/2}, we can see

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1 that, as I say, Dan Ball sends the results to you, to
 2 Adrian Brazier and Adam Heath, and he says this:
 3 "No cigar again, K15 was worse than the K5, both
 4 look on track for a class 1, but neither as a finished
 5 product have met the criteria for class 0. This is
 6 where the regs that state that you can claim it from the
 7 facing starts to cause issues, we have a class 0 facing
 8 on K15 and therefore according to part B can then claim
 9 that anything with that facer is class 0, but when
 10 tested as a complete product as placed on the market
 11 it's not class 0.

12 "Kind Regards

13 "Dan Ball."

14 Now, just pausing there, Dan Ball is clearly
 15 pointing out to you that saying that a composite product
 16 is class 0 because its surface is class 0 when the
 17 composite itself fails class 0 causes issues. He says
 18 it causes issues. You could see that, couldn't you?
 19 That's what he is telling you.

20 A. Yes.

21 Q. Did that not prompt you to see the absurdity of the
 22 position of your decision that you apparently still
 23 stand by today, which is selling a composite product as
 24 class 0 when it had failed a 476-6 test merely because
 25 the surface alone when tested separately passed?

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1 A. It didn't, because I think, like I've said before,
 2 I think the interpretation is fair. The test is not
 3 designed for this type of material, so you get these
 4 extraneous results. On the fire propagation side of it,
 5 it always gets a class 1 because the facer doesn't come
 6 off, but in the part 6, the facer comes away and you get
 7 a false result. So I think it's still a fair
 8 interpretation.

9 Q. Even though, as he's clearly making it plain to you, K15
 10 as a product, which people buy as a product -- they
 11 don't buy it separately, they buy K15 as a composite
 12 product -- would fail a 476 test?

13 A. It would fail to achieve the requirements for class 0 on
 14 the 476-6 element of it, that's correct, it would.

15 Q. If we go to your response to his email, because you do
 16 respond to it, we can see what you say.

17 Now, it comes in a little bit later, 5 September,
 18 and you say, bottom of page 1 {KIN00004213/1}:

19 "Dan

20 "Interesting results, I have a couple of questions

21 "• how do we determine the class 0 cert for K15

22 facer, do we do it or is certified by the supplier?

23 "• How do we account for the difference when tested
 24 as a combined part? Perforations?"

25 Why did you ask who certifies the K15 facer?

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1 A. I thought it might be possible that the supplier would
 2 test the facer to that standard. It isn't the case, but
 3 I thought I'd ask the question.

4 Q. Your second question is:

5 "How do we account for the difference when tested as
 6 a combined part? Perforations?"

7 Was that not the key question, because here we see
 8 you wanting to know how to explain the difference in
 9 performance between the composite as tested and the
 10 foil facer as tested? That was what you were asking.

11 A. Yes, that's right.

12 Q. And that was the key question, really, wasn't it?

13 A. Yes.

14 Q. Again, you could see that one possible way of doing that
 15 would be perforations; yes?

16 A. I think that's a question as -- with the perforations or
 17 not, depending on the facer.

18 Q. Right.

19 If we go to the top of the email chain then, we can
 20 see Dan Ball writes back on 5 September, same day,
 21 saying, this is to you:

22 "We test the facing separately, and we have a
 23 class 0 summary report, so under part b we can then say
 24 the product is class 0. Low risk however it doesn't
 25 cover, that requires the product as placed on the market

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1 to be tested. So by only claiming it from the facer we
 2 can satisfy part B but not the Scottish regs.

3 "Yes it's the same issue as the euro class really,
 4 pentane and the perforations, the only product in the
 5 kil range that can be class 0 as a product as placed on
 6 the market is the Eco-Therm Pro/protect, uses a pure
 7 foil unperforated (sic)."

8 Pause there. Pentane and the perforations is
 9 a reference to the pentane gases being released -- is
 10 this right? -- through the perforations during the test
 11 and causing a fail?

12 A. That's correct.

13 Q. Were you actually aware that only one product in
 14 Kingspan's entire range could achieve class 0, and that
 15 was Ecotherm Pro/protect?

16 A. I was by this email.

17 Q. And all the rest could not achieve class 0.

18 A. That's correct.

19 Q. Continuing with Dan Ball's email, he goes on to say
 20 this:

21 "It is something that needs some attention if we
 22 wish to continue with stating class 0 as claiming
 23 class 0 from the facing is somewhat misleading ..."

24 Pausing there, that's right, isn't it? He is
 25 correct.

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1 A. Yeah, I would agree.
 2 Q. You would:
 3 "... or could leave us open to unwanted attention
 4 if we are claiming class 0 to part B but not stating
 5 'low risk' in accordance with the Scottish regs. They
 6 could put 2 and 2 together and realise that the class 0
 7 has been obtained from just testing the facing, which is
 8 technically allowed but when I have spoken with fire
 9 engineers in the past, like Frans Paaps they have agreed
 10 that technically you can claim it like that but they
 11 always advise that the product should be tested as a
 12 complete product (of course they would as they will
 13 always err on the side of caution). So whether we
 14 can/want to state class 0, when as a finished product we
 15 will only have reports stating they are class 1, I don't
 16 know how we want to proceed there, as we don't have a
 17 report that states class 0 on finished product, when
 18 I tested core we didn't even get class 1 this time both
 19 k5 and the k15 got class 1 but they were a fair way off
 20 getting a total index of less than 12, with no
 21 individual result over 6. We were over 12 after 3 burns
 22 and there are a total of 5 in the test."
 23 Did it not at least by that stage strike you as odd
 24 that you could claim class 0 in England by the reason of
 25 a pass of the test to the foil facer alone, but not in

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1 Scotland, where the test requires the composite to pass?
 2 A. Well, there was a clear difference in the definition, so
 3 I don't know how the definitions were derived, but
 4 for -- in ADB it was allowable to test the surface, but
 5 in the Scottish technical book it wasn't.
 6 Q. Did you not stop to ask yourself, now that this
 7 distinction has been made crystal clear to you at this
 8 point by Dan Ball, and ask yourself the question: why is
 9 it that the guidance for England and Wales allows this
 10 literal interpretation which you were apparently keen
 11 on, and Scotland doesn't? Did you ask yourself that
 12 question?
 13 A. I may have asked myself it, but I wouldn't have known or
 14 how to go about finding out how the differences were --
 15 had occurred. That was just what was in the
 16 regulations.
 17 Q. Well, did you know at the time of any policy differences
 18 as between England and Scotland in this respect?
 19 A. No. Policy difference? No.
 20 Q. There is no difference, is there, on how fires behave on
 21 products south of the Scottish border from how they
 22 behave north of the Scottish border?
 23 A. No.
 24 Q. So if the difference was a real difference as opposed to
 25 an apparent difference, you would have wanted to know

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1 what that difference was based on.
 2 A. Possibly, yes.
 3 Q. The reality is, isn't it, Mr Pargeter, that the
 4 difference that you claim to have seen between the
 5 English and the Scottish test requirements was entirely
 6 illusory; it wasn't a real difference, it was just
 7 an argument of semantics based on your literal reading
 8 of Approved Document B.
 9 A. That's correct, it was different interpretation,
 10 different statement.
 11 Q. And that's why Dan Ball felt he had to give the warning
 12 that people might put two and two together and work out
 13 what you had done.
 14 A. Well, I think it was clear that we'd tested it to the
 15 English and Welsh regulations.
 16 Q. In the way that you interpreted them.
 17 A. Yes.
 18 Q. Or purported to.
 19 Was it after this email that the decision was made
 20 to remove "low risk" from K15's marketing literature so
 21 far as it was directed at the Scottish market?
 22 A. I can't remember exactly when we changed it.
 23 Q. Do you know who made the decision that low risk should
 24 no longer be claimed for K15?
 25 A. Ultimately I did.

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1 Q. You did that, am I right, because it would have been
 2 completely unopen to you on the basis of the wording?
 3 A. Yes, that's correct.
 4 Q. Did you ask yourself how come, up to that point, K15 had
 5 been described as low risk?
 6 A. It was the core, actually, in the literature that was
 7 being claimed as low risk, but it was on the
 8 understanding that there was some previous test evidence
 9 to have claimed it.
 10 Q. Who made the decision that, even though you were going
 11 to withdraw the description of low risk for the Scottish
 12 market, nonetheless you would continue to claim class 0
 13 for K15 in the English and Welsh markets?
 14 A. Well, I did.
 15 Q. And that decision was taken in the face of Exova's
 16 advice that the product should be tested as a complete
 17 product, and that that was the conservative way to do
 18 it, and that any other approach was less than ideal?
 19 A. It was based on my interpretation of ADB.
 20 Q. So you took a conscious risk to market class 0 in a way
 21 that was riskier and put people's lives at greater risk
 22 than if you had told them exactly what you had done?
 23 A. I don't think it put people's lives at greater risk, but
 24 I do consider we could have made it clearer.
 25 Q. You don't think it put people's lives at risk, but,

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1 Mr Pargeter, it isn't for you as the manufacturer to
 2 decide that question, is it? That's why we have
 3 a testing regime.
 4 A. I just stuck with that interpretation of ADB.
 5 Q. Because if the logic of your thinking was carried to its
 6 conclusion, you would think to yourself: well, I think
 7 that this is perfectly safe and therefore the testing
 8 regime simply doesn't matter. That can't be right, can
 9 it?
 10 A. No, that's not right.
 11 Q. No.
 12 Were you aware at the time that industry, by which
 13 I really mean some parts of the UK construction
 14 industry, not all, often confused class 0 with limited
 15 combustibility?
 16 A. I wasn't, no.
 17 Q. You weren't?
 18 A. No.
 19 Q. Were you aware that in the past, the phrase "limited
 20 combustibility" had been used even in respect of K15?
 21 A. At the time, no.
 22 Q. Were you aware of a thinking in some parts of the UK
 23 construction industry that class 0 simply meant that it
 24 was safe above 18 metres?
 25 A. No.

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1 Q. Can we look at your second witness statement, please, at
 2 page 10 {KIN00020824/10}, come back to that, and let's
 3 look at paragraph 3.18. I said I would come back to it;
 4 I'm now doing that.
 5 At the end of that paragraph there, you say:
 6 "In order to reflect these changes in what part of
 7 the product had been tested, Kingspan updated the K15
 8 product literature in October 2017 to define its Class 0
 9 status as 'achieves Class 0 as defined in Approved
 10 Document B in England and Wales.'
 11 Is that a reference to the wording that
 12 Reshma Roodurmun put together in the email chain we
 13 looked at earlier?
 14 A. Yes, I think it is.
 15 Q. Effectively removing the reference to the core; yes?
 16 A. Yes.
 17 Q. Let's look at the documents at the time, {KIN00008729}.
 18 This is the Kingspan Kooltherm K15 rainscreen board --
 19 I don't know whether you would call it a datasheet or
 20 a piece of marketing literature, but the date is
 21 July 2016, as you can see from the top right-hand
 22 corner, and it's the tenth issue.
 23 A. Yes.
 24 Q. So is this a document you approved, given that you were
 25 head of marketing at the time?

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1 A. Yes.
 2 Q. If you look at page 7 {KIN00008729/7}, we can see here
 3 "Thermal Properties" in the top left-hand corner, and
 4 then a little further down on the left-hand side on
 5 page 7 "Fire Performance", and it says:
 6 "Kingspan Kooltherm K15 Rainscreen Board is Class 0,
 7 as defined by the Building Regulations."
 8 Now, that was untrue, wasn't it?
 9 A. No, because the facer could achieve it, so that's in the
 10 Building Regulations as opposed to the technical
 11 handbook.
 12 Q. I see. So when you approved this document, was your
 13 thinking that this form of words "as defined by the
 14 Building Regulations", was supposed to communicate to
 15 the reader the following idea: namely that K15 as
 16 a composite product had failed class 0, but the foil
 17 surface passed when tested separately, so K15 can be
 18 treated as having passed class 0?
 19 A. It was to show that into the Building Regulations and
 20 the interpretation of the England and Wales
 21 Building Regulations, it was allowable to claim class 0.
 22 Q. If you were so confident in the argument that that is
 23 what Approved Document B meant, why not just say that
 24 K15 is class 0 because its foil facer has passed
 25 a BS 476 and 7 test?

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1 A. Yeah, I agree, on reflection, that's something we could
 2 have done.
 3 Q. Well, now, you say on reflection you could have done; at
 4 the time, surely you realised that you should have done.
 5 A. It didn't occur to me at the time.
 6 Q. You say it didn't occur to you at the time.
 7 Mr Pargeter, I simply can't accept that as a true
 8 answer, for the reasons, looking at the documents we
 9 have been through, which show that this language was
 10 intended to convey but in reality to conceal the fact
 11 that, contrary to what is said, the rainscreen board is
 12 not class 0.
 13 A. But the definition, it is class 0.
 14 Q. Was your thinking at the time that somebody would pick
 15 up this document, read what's written there and think to
 16 themselves: ah, well, they only tested the foil facer to
 17 class 0, and that's good enough for me?
 18 A. No, that they would see that it was, as defined by the
 19 building regs, class 0.
 20 Q. Given that you had no reason to think that the literal
 21 interpretation of Approved Document B was one shared
 22 widely in the industry or by your competitors, how could
 23 you possibly honestly have thought that anybody in the
 24 industry picking up this document and reading it would
 25 have adopted or even seen that literal interpretation?

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1 A. I would have assumed that people in the industry
2 understood there was a difference between the England
3 regs and the Scottish regs, and it was under the England
4 and Wales regs, that definition was.
5 Q. The reality, Mr Pargeter, let's face it, is that you
6 intended deliberately to mislead your market, your
7 customers, by these words, and indeed your competitors,
8 for what it's worth, but would have an argument if
9 challenged and then see how it went?
10 A. No, I disagree.
11 Q. It was a thoroughly disingenuous and opportunistic
12 choice of words on your part to conceal the fact that
13 K15 had never passed class 0 and never would, as
14 a composite product.
15 A. No, I disagree.
16 Q. And you were seeking to perpetrate a fraud on the
17 market, and also to mislead customers into buying
18 products that you knew had failed regulatory fire safety
19 tests.
20 A. No, that's not the intention at all.
21 Q. And you would do the same today, because you stand by
22 that argument even now, it seems.
23 A. That's not ... I don't agree.
24 Q. Let's adopt a different angle, and look at it the other
25 way round.

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1 At its most generous to you on what you have told
2 us, which is that this was a literal reading you thought
3 was fairly available to you -- and tell me if I've
4 misunderstood that, that's how you read it at the time.
5 A. Yes.
6 Q. On a literal reading, it was fairly open to you to
7 describe K15 as you have here.
8 A. Yes.
9 Q. Would you accept that, even on that basis, you were
10 exploiting a loophole in the guidance?
11 A. No, I think it was interpreting ADB. I don't think it
12 was exploiting a loophole.
13 Q. You were interpreting ADB, though, in accordance with
14 a literal form of words, rather than by reference to the
15 underlying intentions in reality.
16 A. I'm interpreting it just by what it said.
17 Q. You had seen a weakness in the drafting and were
18 proposing to exploit it.
19 A. No, I don't think so. I think it was, like I say, the
20 interpretation of ADB.
21 Q. And that's why you were forced to remove the references
22 to the product being low risk in Scotland, but then did
23 nothing to inform industry in England and Wales that the
24 classification of class 0 couldn't be maintained,
25 because of that literal reading.

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1 A. It could be maintained because of that literal reading.
2 Q. Let's look at your second statement.
3 Before I do, can I just ask you this: in Scotland,
4 is it right that it was only after the Grenfell Tower
5 fire in June 2017 that you expressly then made the
6 product literature state that K15 was medium risk in
7 Scotland?
8 A. I can't remember exactly when it was, but we'd had
9 a few, I think, customers ask: well, what is the rating
10 if it's not low risk?
11 Q. Right.
12 A. So we took the decision to make that clearer.
13 Q. Right.
14 Let's just look at what you say about that. Your
15 second statement, please, at page 30 {KIN00020824/30},
16 and I would like to look at paragraph 4.41(c), about
17 a third of the way down that page. You say there:
18 "The K15 product literature was further amended in
19 the 11th Issue dated October 2017 to state 'Kingspan
20 Kooltherm K15 Rainscreen Board achieves Class 0 Rating,
21 as defined by Approved Document B in England and Wales,
22 and Technical Booklet E in Northern Ireland. It also
23 achieves medium risk, as defined in the Technical
24 Handbook in Scotland.' This wording now makes clear that
25 K15 achieves a 'medium risk rating' in Scotland and

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1 removes all ambiguity."
2 Now, do you accept that that wording that you have
3 set out there on the page was as misleading as the
4 wording in the July 2016 version of the K15 product
5 literature?
6 A. No, I don't. It's not misleading.
7 Q. This is of course October 2017, after the Grenfell Tower
8 fire. Why not simply put out a clear, correct and
9 unambiguous description of the test results for this
10 product?
11 A. Because that was our interpretation of ADB.
12 Q. Why did you wait 15 months before getting round to
13 stating what the true level was in Scotland, medium, but
14 in the intervening 15 months -- so July 2016 to
15 October 2017 -- said nothing about it, but simply left
16 class 0 in?
17 A. I think it was in response to customer queries about
18 what was the rating in Scotland then, so we responded to
19 that.
20 Q. Did it not occur to you at the time that by removing the
21 reference to low risk in Scotland but leaving the
22 reference to class 0 in England and Wales, Scottish
23 buyers might think that, because it had class 0 in
24 England and Wales, it was therefore low risk in
25 Scotland?

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1 A. No, it didn't.
 2 Q. But given the intended -- well, let me ask you. I've
 3 tried it before, we'll try it again. You didn't see any
 4 intention for there to be any -- let me try it again.
 5 Did you see any intention for there to be any
 6 non-equivalence between Scotland and England? Did you
 7 think that the lack of equivalence you perceived in the
 8 wording was deliberate?
 9 A. Well, it must have been. Why was it differently worded?
 10 Q. But you didn't know of any rational reason why that
 11 should be the case?
 12 A. I didn't know why they were developed into different
 13 definitions, no.
 14 Q. So as far as you were concerned, this was an accident of
 15 drafting without any rational or empirical explanation?
 16 A. I wouldn't say it was an accident, I just wasn't aware
 17 of why the drafting had gone the way it was.
 18 Q. Exactly, and that's a question you never thought to ask
 19 yourself or anybody else?
 20 A. That's correct.
 21 Q. Yes. And on that basis alone, you let Scottish buyers
 22 think that, although there was no specific
 23 classification of low risk in Scotland, nonetheless,
 24 because it was class 0 in England, it could be treated
 25 as low risk in Scotland.

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1 A. Not deliberately.
 2 Q. Well, you say not deliberately; why not, then,
 3 redesignate it as medium risk in Scotland straight away?
 4 A. Yes, we should have done, we --
 5 Q. Why didn't you?
 6 A. It didn't -- didn't think about it, it didn't occur to
 7 us. We just took the low risk rating off. But, in
 8 hindsight, we should have put that it was medium risk.
 9 Q. The reality is obvious, isn't it, Mr Pargeter: that you
 10 had no way out -- even a tenable argument on the narrow
 11 wording in Scotland, which is why you were forced to
 12 remove the reference to low risk, but because you saw
 13 this literal reading in England, you retained the
 14 class 0, and you must have realised, surely, that that
 15 would mislead Scottish buyers into thinking that
 16 although nothing was said about low risk in Scotland,
 17 because it was class 0 in England, that would be
 18 all right in Scotland?
 19 A. No, I didn't think that.
 20 Q. But not to think that, do you accept, if you didn't
 21 think that at the time, then that was, at the very
 22 minimum, a casual and reckless approach to fire safety
 23 regulation?
 24 A. No, I don't think it was casual or reckless.
 25 Q. Now, I've asked you some questions about your perception

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1 at the time of a common misconception in the industry
 2 that class 0 meant limited combustibility or safe above
 3 18 metres, and you have never heard of that.
 4 Can I just ask you to look at something.
 5 {KIN00020841}, please. This is an email chain from
 6 November 2016, and you're on it, just so you're clear.
 7 I want to start at page 6 {KIN00020841/6}, please,
 8 because on page 6 we can see a query from Page Park
 9 Architects in Glasgow, so we're now in Scotland, and
 10 we're now in October 2016. It's from Joanne Hemmings to
 11 Travis Hunter, and she asks him -- and I don't think we
 12 need to know who he is particularly or what project it
 13 is, other than that it's in Scotland -- and she says:
 14 "Hi Travis,
 15 "As discussed, please see note below from the
 16 building control officer."
 17 And she sets out the note about suitable barriers:
 18 "We have only allowed for cavity barriers every
 19 20metres, as the Kingspan K15 has a Class 0 fire rating.
 20 We don't want to go up to cavity barriers every 10m if
 21 possible. Can you please comment?
 22 "We will also need to add a cavity barrier detail
 23 around the windows and doors."
 24 Et cetera, et cetera.
 25 So she is talking here about insulation within

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1 a cavity, it seems.
 2 Then if we go up the email chain we can see how this
 3 evolves. Travis Hunter responds at the bottom of page 5
 4 {KIN00020841/5} with table 13, and that's the relevance
 5 of the classification class 0 of insulation within
 6 a cavity. Travis Hunter says, just above the end of
 7 page 5:
 8 "With Kooltherm K15 being Class 0 and Euroclass C,
 9 it would appear to fall into the max. 20m category."
 10 Don't forget, this is in Scotland, but they're
 11 looking at class 0 there.
 12 If you go up the pages a little bit further to
 13 page 2 {KIN00020841/2}, we see this email coming in to
 14 Kingspan at the bottom there, and up the page further,
 15 you are then engaged by Arron Chalmers, 2 November 2016
 16 at 15.01. He writes to you and says:
 17 "Hi Adrian,
 18 "Can you help on this? You [are] probably aware of
 19 this issue as it's been ongoing for a while, but
 20 basically through a loophole [note the word] we claim
 21 K15 is Class 0 in line with the ADB, by just testing the
 22 facing. However, Scotland's Technical Handbook is
 23 worded better in the sense that the entire product must
 24 be tested to achieve Class 0, to subsequently be
 25 designated as 'low risk'.

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1 "So we have two options -
 2 "1. We know it's not low risk, shall we be honest
 3 and says it's medium risk and therefore cavity barriers
 4 will need to be every 10m and not every 20m. Bearing in
 5 mind, this could then damage us on future jobs as
 6 Xtratherm has a low risk board and therefore huge USB
 7 (sic) over K15."
 8 USB means ultimate selling point.
 9 This is the second of his options:
 10 "2. We blag it, send them our facing test and
 11 confirm that in line with ADB its Class 0, and kind of
 12 ignore her direct question about being low risk and hope
 13 their building control officer interprets this to
 14 Class 0/low risk."
 15 We can see your response in the next email up, if we
 16 turn to page 1 {KIN00020841/1}, bottom of the page, you
 17 to Arron Chalmers, same day, a few minutes later,
 18 20 minutes later to be precise:
 19 "Hi Arron
 20 "Tricky one.
 21 "As class 0 will no longer be recognised by BBA etc,
 22 is there any other test method that can be used to prove
 23 'low risk'?"
 24 What was tricky about a choice between being honest
 25 and blagging it, Mr Pargeter?

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1 A. That isn't tricky, it's the fact that the BBA are no
 2 longer recognising the British Standard tests and are
 3 only going to be referencing the Euroclass tests, and
 4 then what I was trying to find out was what else is
 5 there to give us a low risk in terms of the Euroclass
 6 standard.
 7 Q. Why not just go for option 1: be honest? What was wrong
 8 with that?
 9 A. Nothing was wrong with that.
 10 Q. Well, why not tell him?
 11 A. I just wanted to find out what the other options were,
 12 if class 0 is no longer going to be -- or the
 13 British Standards were no longer going to be referenced
 14 in the BBA.
 15 Q. You wanted to find out what the other options were. You
 16 were given a choice between telling the truth and
 17 blagging it. I can translate "blagging" for you, if you
 18 want me to. Blagging means falsifying or lying about
 19 it. You are given a choice by Arron Chalmers, and
 20 instead of telling him what the obvious answer was, you
 21 tell us that you wanted to find out what the other
 22 options were?
 23 A. Yeah, it wasn't a choice between blagging it --
 24 obviously we would tell them -- go for the honest route,
 25 but we need to work out what other avenues there are if

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1 there is no longer going to be class 0 in our
 2 BBA certificate.
 3 Q. Well, forgive me, you're given one choice of two routes:
 4 being honest and blagging it. Your response isn't to
 5 say to him, "Well, you've got to be honest clearly now,
 6 this is clearly the time we've got to come clean", you
 7 ask him what are the other choices. How could that
 8 possibly be a straight way of dealing with this
 9 question?
 10 A. Well, blagging it was not an option, and possibly
 11 I should have made that clearer, but we need to see what
 12 other options there are as well.
 13 Q. In fact, blagging it, as described, and he then goes on
 14 to describe precisely what that involved, was precisely
 15 the policy you were hoping to pursue, wasn't it?
 16 A. No.
 17 Q. That's precisely why you felt able to produce the
 18 product literature for July 2016 we've seen, with the
 19 statement it has in it, ignore the question about being
 20 low risk, which I put to you then, and hope the
 21 building control officer interprets it to class 0. That
 22 was the policy.
 23 A. No, it wasn't. I don't -- I disagree.
 24 Q. But your response, you see, is also telling, isn't it?
 25 Because you come back, and you don't say to him, "We

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1 can't blag it, you've got to say it's not low risk and
 2 be honest"; you ask for other options.
 3 Now, is that a responsible and honest approach of
 4 the head of technical and marketing?
 5 A. I should have clarified the fact that, you know, the
 6 option of blagging it isn't an option, I agree.
 7 Q. We don't see that, you see. You don't entertain this
 8 request, this very clear exposition of your choices, you
 9 just tell him it's a tricky one and look for other
 10 options.
 11 I've got to suggest to you that this really
 12 identifies exactly what was going on: that you adopted
 13 a disingenuous and opportunistic reading of ADB that you
 14 claim was open to you -- one can argue about that -- had
 15 been told by a fire engineer that that was not
 16 a conservative or ideal reading, and decided to adopt
 17 it, had put out marketing literature, and now that the
 18 net was closing because somebody in Scotland had
 19 actually asked the right question, you were faced with
 20 a "tricky one". That's what was happening, wasn't it?
 21 A. No, it wasn't. I think we needed to understand what the
 22 low risk option was with Euroclass and not any longer on
 23 the British Standard classifications, as they were being
 24 removed.
 25 Q. Let's see how Arron Chalmers responds in light of that

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1 answer. If we scroll higher up, Arron Chalmers comes
 2 back to you five minutes later and says:
 3 "I know, our only option to legitimately claim 'low
 4 risk' is to get a Euroclass B on K15, or somehow get
 5 Class 0 on the product as a whole (which ideally is what
 6 we should be doing anyway). Neither seem like
 7 a reasonable possibility atm"
 8 It's right, isn't it, that ideally you should have
 9 been getting class 0 on the product as a whole but
 10 weren't. That's clear, isn't it? That's what
 11 Frans Paap had advised.
 12 A. In an ideal world, yes, I would agree with that.
 13 Q. Ideally, I would suggest in a compliant world, in
 14 a world where you wanted your products to comply.
 15 A. No, it was still compliant, but ...
 16 Q. It's clear from this, isn't it, that your staff at
 17 Kingspan, Mr Chalmers, knows exactly what you ought to
 18 be doing in terms of claiming class 0, but you weren't
 19 doing it, and that was because you were persisting with
 20 your course of exploiting what you perceived and he
 21 described as a loophole in ADB?
 22 A. That's his view, yes.
 23 Q. What kind of business, what kind of department were you
 24 running, Mr Pargeter?
 25 A. I'd like to think a good, well-run department.

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1 Q. A department that seizes on an opportunistic reading of
 2 fire safety legislation and exploits it for profit, is
 3 how some people would see it. How do you respond to
 4 those people?
 5 A. I don't see it like that at all.
 6 Q. Let's go to the top of the chain. This is an email that
 7 you send on to Gwyn Davies, the technical processing
 8 director, and Tony Scott and Linzi Hobbs:
 9 "Guys
 10 "Just passing on difficulties we are getting in
 11 Scotland, we will soon have to declare a medium risk for
 12 K15 unless we can get Euroclass b on the product, this
 13 will hurt us and allow Xtratherm in with their low risk
 14 product. I was hoping K115 would give us the chance to
 15 tackle this but hope of this has faded with subsequent
 16 testing."
 17 Why were you not declaring a medium risk in Scotland
 18 already, given the knowledge that you had in relation to
 19 the performance of K15 in the testing, November 2016?
 20 A. Because we'd just removed the low risk, and I agree we
 21 should have been clearer that it was medium risk.
 22 Q. At this point, of course, you're alive to the fact that
 23 you would soon have to do that.
 24 A. Yes, to make it clearer for people, agreed.
 25 Q. Why hadn't you done it already, is my question?

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1 A. It just hadn't occurred. My priority was to make sure
 2 it wasn't described as low risk.
 3 Q. Right.
 4 Am I right to take from this email that when you say
 5 "we will soon have to declare a medium risk for K15",
 6 you realised that, for every day that went by, there was
 7 a risk?
 8 A. Yes, potentially, yes.
 9 Q. Yes.
 10 In the end, of course, we know, as we've seen, that
 11 you don't actually declare medium risk for K15 until
 12 October 2017, so that's 11 months later. What accounts
 13 for the delay?
 14 A. I can't explain the delay.
 15 Q. Were you simply keeping quiet in order to allow sales to
 16 continue as industry had not expressly been told that
 17 the classification of the product had changed?
 18 A. No, that wasn't the intention.
 19 Q. Did you not consider your actions in delaying this
 20 change in classification extremely dangerous or risky?
 21 A. No, I didn't.
 22 Q. Can you explain why not?
 23 A. Because if it wasn't low risk then the difference
 24 between being medium or high risk was -- there was no
 25 difference. So it was only if it was low risk would it

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1 be put into buildings which would need or have the lower
 2 barrier content. So if it wasn't low risk then it
 3 couldn't be used in that, that was the logic at the
 4 time.
 5 Q. Do you know how this particular problem that had arisen
 6 in Scotland was resolved?
 7 A. Was resolved?
 8 Q. Yes.
 9 A. No, sorry, no.
 10 Q. What impression in the end did the owner of the building
 11 in Scotland who was asking the question about the
 12 cavity barriers end up with about whether K15 really was
 13 class 0 or not?
 14 A. I can't recall.
 15 Q. Did it occur to you that, unless they were told that K15
 16 was not class 0 as a composite product and was not low
 17 risk as a composite product, they would be misled into
 18 thinking that it was and would therefore apply K15 in
 19 a dangerous location, not in accordance with ADB?
 20 A. No, it didn't.
 21 Q. So it didn't occur to you that people were making
 22 decisions about the position of, for example,
 23 cavity barriers, as we've seen, based on the false
 24 advice that Kingspan was giving?
 25 A. It didn't occur to me, no.

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1 Q. Is it really right that you never stopped and thought
2 about what effect your approach might have on the safety
3 of those in buildings on which K15 was to be applied
4 where a class 0 certification or low risk classification
5 mattered?

6 A. It didn't. I just -- as it wasn't designated as low
7 risk, I thought that would cover us.

8 Q. I'm bound to suggest to you, Mr Pargeter, that your
9 approach to this issue was not only dishonest, but
10 displayed a reckless disregard for human life and
11 safety. Do you accept that?

12 A. No, I disagree.

13 Q. We don't see any evidence that you advised Page Park in
14 Scotland that K15 was medium risk. Can we take it that
15 you didn't?

16 A. No, I don't recall what the outcome of that was.

17 Q. Let's look at a different topic.
18 I want to ask you about BCA Technical Guidance
19 Note 18 and Kingspan's routes to compliance document, to
20 which we're now going to return.
21 It's right that, going back in time a couple of
22 years, not long after the July 2014 test, you were
23 promoted to head of marketing in November of that year,
24 and we can see what that role entailed.
25 Can we go to your second statement, please, at

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1 page 3 {KIN00020824/3} and look at paragraph 2.2(c).
2 You explain there that you were promoted to head of
3 marketing, and you explain in the fourth line down that
4 the role:
5 "... included the design and production of all
6 marketing materials such as product brochures and
7 newsletters. The team was also responsible for the
8 development of technical research projects and
9 Kingspan's fire safety compliance campaign regarding the
10 use of K15 in rainscreen specifications. K15 is
11 primarily marketed via literature, technical bulletins
12 and associated professional development presentations to
13 architects and specifiers."
14 Now, you have told us before that you were
15 responsible, essentially, for the creation of Kingspan's
16 routes to compliance document as part of the fire safety
17 campaign that you created. I just want to ask you about
18 the way in which K15 was marketed from the time you
19 started in November 2014. So we're going back a little
20 bit in time, I'm afraid.
21 Can we go over the page to paragraph 4.2 of this
22 same statement, please. I say it's over the page; it's
23 page 12 {KIN00020824/12}.
24 You say at the bottom of page 12:
25 "By the time I was appointed as Head of Marketing in

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1 November 2014, Kingspan's strategy was primarily to try
2 and increase and expand the safe use of K15 as part of
3 compliant systems in external cladding systems,
4 including for buildings with a floor over 18 metres."
5 As of November 2014, what percentage of the sales of
6 K15 were for use on buildings over 18 metres, even
7 roughly, can you remember?

8 A. No, I think it's difficult to break that down, because
9 of the route to market.

10 Q. Was it a substantial percentage of sales, or was it
11 an insubstantial percentage of sales, even roughly give
12 us an idea?

13 A. I think by 2014 it was quite a substantial --

14 Q. How did you seek to expand the use of K15 in the
15 over-18-metre market?

16 A. How did we seek to expand?

17 Q. Yes. It's your word. You say the strategy was
18 "primarily to try and increase and expand the safe use
19 of K15". How did you seek to expand the use of K15 over
20 18 metres?

21 A. By the routes to compliance campaign, so people were
22 aware of the routes to compliance, and the promotion of
23 the -- you know, that route, the BCA guidance.

24 Q. Right. Does that mean desktops?

25 A. Yes.

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1 Q. Right.
2 If we look at the next paragraph {KIN00020824/13}:
3 "Kingspan's strategy as to how to achieve such
4 increase and expansion was helped by the issuance of the
5 BCA Technical Guidance Note 18 'Use of Combustible
6 Cladding Materials on Residential Buildings' in
7 June 2014 ..."
8 Then you explain that a little bit more in
9 paragraph 4.4.
10 Just for everyone's benefit, the BCA released
11 a technical guidance note called Technical Guidance
12 Note 18 in June 2014 which gives three routes to
13 compliance, doesn't it, for combustible materials over
14 18 metres: either you use non-combustible materials; or,
15 if you're using combustible materials, a build-up by
16 being tested under a system test under BS 8414; or,
17 thirdly, a desktop analysis. Those are the three,
18 weren't they?

19 A. Correct.

20 Q. Yes, and I think you have identified this, but the
21 technical guidance note helped your strategy because it
22 expanded the kinds of rainscreen cladding systems into
23 which you could sell K15 by the extrapolation analysis
24 done by a proper desktop.
25 A. Correct.

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1 Q. Right.

2 Now, let's go to page 77 of this statement
3 {KIN00020824/77}, paragraph 8.8. In the middle of the
4 page there, you are asked about your awareness of the
5 content of BCA's Technical Guidance Note 18 issue 0 or
6 issue 1, issued in June 2014 and 2015 respectively, and
7 your answer, as you can see, is:

8 "I was not aware of the content of the BCATGN18
9 Issue 0 or Issue 1 prior to its publication and I have
10 no knowledge of any other employee or agent of Kingspan
11 having any such prior knowledge."

12 Can we look, in the light of that evidence, to
13 {BRE00004073}, please. This is an email, and at the top
14 of the chain, it's a longish chain, it's in July 2015,
15 and we can see here Ivor Meredith writing to the BRE,
16 Phil Clark, Stephen Howard and Dr Debbie Smith.

17 If you look at the third paragraph down, he says
18 this:

19 "We are slowly educating the NHBC and worked with
20 them and the BCA to produce BCA Technical Note 18 (the
21 June Issue of this document should be available through
22 the BCA website) that promotes BS 8414 and Assessments
23 relating to BR 135. Kingspan foresee a need for
24 a massive amount of assessments over the next 12 months
25 however this project is a little tricky as its fallen

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1 fowl of their policy change and they have moved the goal
2 posts and are refusing to sign it off without a revised
3 assessment of the facade, even though they originally
4 sanctioned the construction. Kingspan incidentally were
5 not contractually involved thus was only made aware of
6 the job when it became an issue."

7 Now, I should have pointed out to you that this is
8 in the context of a particular project. It's the
9 Kew Bridge West project, so that's what the last part of
10 that paragraph is referring to. But I want to ask you
11 about the first part of that paragraph, where he says,
12 "We are slowly educating the NHBC". Were you aware of
13 that at the time?

14 A. I don't recall that, no.

15 Q. Were you not aware that members of the NHBC were also
16 members of the BCA?

17 A. I knew NHBC were members of the BCA, yes.

18 Q. And was it the case that both NHBC and Kingspan were
19 keen to expand the routes to compliance?

20 A. Yes, I would think so, yes.

21 Q. Did Tony Millichap not mention this fact to you when he
22 left in May 2015, just two months before this?

23 A. The fact that we were involved ...?

24 Q. Yes. The fact that Kingspan had been educating the NHBC
25 slowly and working with them and the BCA to produce BCA

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1 Technical Guidance Note 18?

2 A. I don't recall.

3 Q. Right, let's look at {NHB00000977}. I'd like to ask you
4 about a meeting that took place in March 2015 with the
5 NHBC. This was two months or so before Mr Millichap
6 left Kingspan's employment.

7 We can see that you are not there, but from Kingspan
8 we have Richard Burnley, MD, managing director,
9 Tony Millichap and Ivor Meredith. We can see the agreed
10 actions from that March meeting, and if you look at
11 action number 3 from the meeting, it says:

12 "NHBC to discuss widening/amending scope of options
13 for demonstrating compliance stated in BCA Guidance
14 Note."

15 Were you aware that that was an action note agreed
16 with the NHBC at the meeting?

17 A. I don't recall seeing that at the time.

18 Q. Right. Now, this is March 2015, so you're head of
19 marketing but you haven't yet taken on the head of
20 technical role. You took that on from Tony Millichap.

21 A. Yes.

22 Q. So does that explain why he didn't report this to you at
23 that time?

24 A. Possibly, or I don't recall it.

25 Q. Did Richard Burnley have a conversation with you at this

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1 time about meeting NHBC, even generally?

2 A. I think I was aware they'd had a meeting with NHBC, but
3 with -- looking at the chronologies with our discussions
4 with NHBC, I'm not sure exactly when I would have known
5 that. So I'm not sure I would have known about that
6 5 March meeting prior --

7 Q. When you -- I'm so sorry. Did you want to finish your
8 answer?

9 A. I was going to say: prior to looking at documents for
10 the Inquiry.

11 Q. When you took over the job of head of technical, and
12 conjoined it with the head of marketing, did
13 Mr Millichap on his departure brief you about his
14 meetings that he had had earlier that year with the
15 NHBC?

16 A. I don't recall.

17 Q. You don't recall?

18 A. No.

19 Q. You mean you don't recall one way or the other or you
20 don't recall it happening?

21 A. I don't recall it happening.

22 Q. Did Mr Millichap hand you his file when he left?

23 A. There were -- there was some paperwork, but I don't
24 remember NHBC notes in that file.

25 Q. When Mr Millichap left, did he give you access to his

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1 files , whether they were in paper form or electronic
 2 files , so that you could carry on where he had left off
 3 in the role of head of technical?
 4 A. Yeah, I think there were some paper files , I think, that
 5 were in the office . But I can't recall exactly what was
 6 in them now.
 7 Q. Did you read them? Did you take the trouble to go
 8 through his file and pick out what you needed to
 9 continue with the job?
 10 A. I think I -- probably, yes. I can't recall it but
 11 probably, yes.
 12 Q. Do you remember seeing this document at the time?
 13 A. No, I don't.
 14 Q. Now, let's go back to the routes to compliance technical
 15 document. Can we go to {KIN00020824/23}, please. This
 16 is your second statement. I would like to go to
 17 paragraph 4.21 on that page at the bottom. You say:
 18 "My role in preparing the technical content of the
 19 first issue of this bulletin was limited as by the time
 20 I took over as Head of Technical in May 2015 most of the
 21 drafting and compilation of relevant test data had
 22 already been completed by Ivor Meredith (Technical
 23 Project Manager) and Tony Millichap (Head of Technical).
 24 Once my role expanded to include Head of Technical,
 25 I worked with the team to ensure the document reflected

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1 the guidance provided in BCATGN18 and also became
 2 involved in the reviewing of drafts of the Routes to
 3 Compliance document."
 4 The last part of this paragraph is something we have
 5 been through a little bit earlier in your evidence on
 6 signing off the drafts , so let's just take it on a bit
 7 by reference to the contemporaneous material.
 8 Can we go to {KIN00006464}, please. This is
 9 an email you sent to Cathy Barlow at the PR firm
 10 Smith Goodfellow on 6 May 2015 where you attach a draft
 11 of the document, and we can see you say at the top of
 12 the page:
 13 "We have now put together a brief of our thoughts on
 14 a mini campaign to cover the routes to compliance for
 15 K15, addressing the fire issues as previously discussed.
 16 We agree with your view below, regarding the approach.
 17 "The main focus is on producing the technical
 18 bulletin and we have attempted a basic structure and
 19 mind dumped our thoughts around what it needs to say
 20 (pages 4- 6)."
 21 You can see that what's attached to your email to
 22 Cathy Barlow is a document called "Routes to Compliance
 23 for High Rise V2.pdf". That's the second of the
 24 attachments up there, isn't it?
 25 A. Yes.

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1 Q. In fact , that document -- let's just put it in front of
 2 you, {KIN00008257} -- is the draft. I'm saying that;
 3 can you confirm that? That's the first page of it .
 4 A. Yes.
 5 Q. You can scroll down to the second and third pages just
 6 to confirm that that's what you sent Cathy Barlow in
 7 that email on 6 May 2015. Yes?
 8 A. Yes.
 9 Q. Right.
 10 Now, it's not right to say, is it, therefore, that
 11 the document was already written, because you're sending
 12 a draft to Smith Goodfellow?
 13 A. I think the information was there, and we were looking
 14 to Smith Goodfellow to compile it all .
 15 Q. Right. You're agreeing the view regarding the approach.
 16 If we look at the bottom of the email chain, if we
 17 can just go back to that, we can see that there is
 18 an earlier correspondence, but if you go back to page 2
 19 {KIN00006464/2} in that email run, you can see that you
 20 send her on 1 May something called the "NHBC
 21 communication regarding combustible insulation above
 22 18 m". What was that document?
 23 A. I think it may have been their technical advice
 24 document.
 25 Q. Issue 0 from June 2014?

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1 A. Possibly .
 2 Q. Right.
 3 Now, it's right, isn't it, that Smith Goodfellow's
 4 advice was to support the NHBC in your marketing
 5 material, wasn't it?
 6 A. Erm ... did it say that?
 7 Q. Let me show you what she says. At the bottom of page 1
 8 {KIN00006464/1}, she sends an email to you on 5 May in
 9 response to yours, and she says:
 10 "This is not as bad as I feared and I think that the
 11 way forward is to send out a communication [in bold] in
 12 support of what the NHBC is saying. The letter talks
 13 about limited combustibility, not non-combustible, and
 14 it reinforces the use of BS 8414, and of
 15 a fire engineering approach."
 16 A. Yes, that's correct.
 17 Q. Right. So was the bulletin that you then produced as
 18 part of a wider campaign designed to adopt the BCA
 19 routes to compliance and thereby partner with the NHBC
 20 on widening the scope of K15?
 21 A. I wouldn't say it was to partner with them, but it was
 22 to support that BCA document.
 23 Q. Right.
 24 If we can go to the final version of the routes to
 25 compliance document, then, at {KIN00003148} which we've

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1 seen before and was released in August 2015, I just want
2 to take you to page 3 in it {KIN00003148/3}. There it
3 refers to common misconceptions.

4 It starts by giving an introduction, "About this
5 Document", and it says in the second paragraph:

6 "However, choosing the best route to compliance,
7 with fire safety regulatory requirements in
8 Great Britain, necessitates a clear understanding of the
9 complexities and the common misconceptions that surround
10 the use of insulation in these constructions. The route
11 that best serves the purpose of the building and the
12 needs of stakeholders, whilst producing a well-balanced
13 result, may not always be the most obvious option."

14 What were the common misconceptions that you're
15 referring to here?

16 A. I think that there was a view that it was generally
17 misunderstood the options of the BCA guidance, so we
18 were looking to clarify that from our perspective.

19 Q. When you say you were looking to clarify the
20 misconceptions about the BCA guidance, do you really
21 mean that you were looking to support the expansion of
22 the application of the 8414 test by use of the desktops?

23 A. Yes, I think that would be --

24 Q. Yes.

25 Let's look at page 5 of the bulletin

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1 {KIN00003148/5}, the routes to compliance document. In
2 the first paragraph on page 5 we can see that, as part
3 of a long analysis of the BCA material, you say:

4 "With the aim of addressing common misconceptions as
5 regards to the use of combustible materials within the
6 façade system of residential buildings containing
7 a storey 18 metres, or greater, above ground level,
8 industry group, BCA, issued its Technical Guidance
9 Note 18: Use of Combustible Cladding Materials on
10 Residential Buildings (Issue 1: June 2015)."

11 Do you see that?

12 A. Yes.

13 Q. Then it goes on to explain -- and I'm summarising,
14 I hope accurately -- the fact that because of the number
15 of possible façade build-ups, you can't have fire test
16 data for every single one and you need desktops as
17 a result to expand the application. I've summarised
18 that probably rather crudely, but that's the effect of
19 what's said.

20 A. That's the essence, yes.

21 Q. Yes. If you go to page 6 {KIN00003148/6} in the middle
22 of the page there, there is a reference to "Linear
23 Route", and it says:

24 "Although Kingspan Kooltherm K15 Rainscreen Board,
25 and its rigid thermoset insulation core, are Class 0, as

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1 defined by the Building Regulations, the linear route to
2 compliance is not open."

3 Now, can you explain why class 0 is mentioned there
4 at all?

5 A. Erm ... no, not really. I think ... limited
6 combustibility is not open. It's not limited
7 combustibility, therefore it's not open for the linear
8 route. But I think it was just to reiterate that it was
9 class 0, but it's not -- yeah, so it's not part of the
10 linear route, so ...

11 Q. Right. Let's just take it in stages. Again, you have
12 told us before that this document was signed off by you
13 on 24 July 2015 before sending it to Richard Bromwich
14 and Richard Burnley, so you would have read it with
15 care, and I put that to you earlier.

16 A. Yes.

17 Q. Can I assume that you read this page with care,
18 particularly under "Linear Route"?

19 A. I would like to think so.

20 Q. Yes. So never mind the point about class 0 as defined
21 by the Building Regulations. We have been through that,
22 I'm not going to ask you about that again. My question
23 is: why are you referring to class 0 here at all when
24 class 0 has got nothing to do with the linear route to
25 compliance?

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1 A. I can't really explain. It was part of the drafting.
2 I think it's correct, but what's its relevance, I can't
3 explain.

4 Q. Well, it's not actually even correct, is it, because it
5 gives the impression that class 0 might have something
6 to do with the linear route to compliance, and I have to
7 suggest to you that this was in there because you knew
8 that many people in the industry thought that class 0
9 was a passport to use above 18 metres.

10 A. I wasn't aware of that at that time.

11 Q. And the reason why class 0 is referred to at all is to
12 continue to make use of that perception. It's part of
13 a positive message, isn't it?

14 A. No. Well, this kind of dispels that message, in a way,
15 so I don't think there was an intention to keep
16 referring to class 0 so that it is misunderstood as
17 being of limited combustibility.

18 Q. So I ask the question again: what is the point of
19 referring to class 0 here at all?

20 A. Looking at that now, I think it must be to clear that
21 potential up.

22 Q. Sorry, I don't --

23 A. To clear that potential up between class 0 and limited
24 combustibility.

25 Q. I don't understand that, I'm afraid. What potential up?

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1 Clear what potential up?

2 A. That there was a misconception between class 0 and

3 limited combustibility.

4 Q. But you're perpetuating the misperception by continuing

5 to refer to class 0 where it's exactly not wanted,

6 aren't you?

7 A. No. I mean, here we're clearly defining it as not,

8 so ...

9 Q. When you read this document with care, you must have

10 asked yourself: well, why are we referring to class 0

11 here under the linear route, didn't you?

12 A. I didn't, no.

13 Q. Why not simply say, "K15 is not a product of limited

14 combustibility, and therefore can't meet the

15 requirements of part B2 of the Building Regulations

16 unless it's part of a successful 8414 test or part of

17 a desktop"? Why not just say that?

18 A. We could have said that.

19 Q. But you didn't, and chose to --

20 A. No.

21 Q. -- introduce the concept of class 0, and I'm suggesting

22 a rational reason for that, which is that you saw that

23 as a selling point.

24 A. Potentially.

25 MR MILLETT: Is that a convenient moment?

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1 SIR MARTIN MOORE-BICK: Yes, I think it is. You haven't

2 finished with this document, I take it?

3 MR MILLETT: No, certainly not.

4 SIR MARTIN MOORE-BICK: But it's a good point to stop.

5 MR MILLETT: Yes.

6 SIR MARTIN MOORE-BICK: Mr Pargeter, we will have another

7 short break at this point. We will come back at 3.40,

8 please, and the usual business: don't talk to anyone

9 about your evidence while you're out of the room,

10 please.

11 THE WITNESS: Yes.

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

13 (Pause)

14 Right, 3.40, please. Thank you.

15 (3.25 pm)

16 (A short break)

17 (3.40 pm)

18 SIR MARTIN MOORE-BICK: All right, Mr Pargeter?

19 THE WITNESS: Yes.

20 SIR MARTIN MOORE-BICK: Right, ready to carry on?

21 Yes, Mr Millett.

22 MR MILLETT: Mr Chairman, thank you.

23 Mr Pargeter, I would like to ask you about some case

24 studies in this bulletin, so we're going to stay with

25 the same document. Can we go to page 8 {KIN00003148/8},

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1 please. This is the section of this document entitled

2 "Case Studies". The first of those is a building or

3 a project called New Pendleton in Salford, residential

4 tower blocks, can you see that? It says in the first

5 paragraph:

6 "Nine 1970s residential blocks in central Salford

7 are being given a new lease of life with both the inside

8 and out being revitalised thanks to a major retrofit

9 scheme, which incorporates premium performance Kingspan

10 Kooltherm K15 Rainscreen Board in the over-cladding of

11 external walls."

12 In the third paragraph down, it says:

13 "The tired brick façades of the mid and high level

14 apartment blocks are being replaced by modern aluminium

15 rainscreen cladding. The first tower, the 12 storey

16 'Whitebeam', was completed in July, and is soon to be

17 followed by the 23 storey 'Spruce'."

18 If we can go to page 9 {KIN00003148/9}, we can see

19 a full picture of the building, one of the buildings,

20 and the cladding there is in fact, as we can see later,

21 Reynobond ACM, isn't it?

22 A. I believe so.

23 Q. Yes.

24 A. Yeah.

25 Q. Were you aware that there were different versions of

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1 Reynobond ACM panels?

2 A. No, not at that time.

3 Q. Were you aware if the Reynobond on the Pendleton

4 buildings had a PE core or whether it was an FR core,

5 fire retardant?

6 A. I don't recall.

7 Q. Did you ask anybody?

8 A. No, I don't think so.

9 Q. Did you make any enquiries at all about this cladding or

10 rainscreen product before it was featured in your

11 marketing material?

12 A. No, I think we would have done the -- we'd have

13 contacted the owners of the building and asked if we

14 could do a case study on it, and that would have been

15 done through our agent, Smith Goodfellow.

16 Q. Yes, and if we can pursue that a little bit, can we go

17 to {KIN00002729}, please. This is an email from

18 Simco -- sorry, I should show you the middle email on

19 page 1. It's an email from Ben Bishop at Simco to

20 Dan Ball about the fire certificate, and this is in the

21 context of a rather longer email chain about this

22 project.

23 If we go to page 3 {KIN00002729/3}, we can see that

24 here is Ben Bishop's email to John Simmons at Simco of

25 23 July 2014, "K15 fire certificate":

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1 "John,
2 "Please filled (sic) out Kingspan questionnaire
3 below."
4 If you look at the third box down, you can see
5 there's the cladding there, and it's "Reynobond, 4mm
6 thick ". Do you see that?
7 A. Yes, yes.
8 Q. You can also see that the building is 33.09 metres high
9 and is a block of flats . You see that a little bit
10 lower down. 61 metres is Pendleton Spruce Court.
11 A. Yes.
12 Q. And Pendleton Whitebeam over the page is 33.09. So
13 these are high-rises .
14 At least , if not you, certainly Kingspan would know
15 that this was Reynobond 4 millimetres going in on these
16 buildings over 18 metres; that's right , isn't it?
17 A. Yes, from that, yes.
18 Q. I accept that you don't see whether that's PE core or
19 not, I accept that. But just to show you that evidence.
20 Then if we go to {KIN00002731}, this is a letter
21 from Kingspan to Simco dated 14 August 2014, written by
22 Dan Ball to Simco, and we know it's Dan Ball from
23 page 2.
24 Have you seen this letter before?
25 A. I don't recall it.

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1 Q. You were Dan Ball's line manager at this point, weren't
2 you, August 2014?
3 A. No, I wasn't.
4 Q. You weren't?
5 A. No, it would have been from May 2015.
6 Q. Right. Okay. Let's see how we go with it, then. Maybe
7 you can't help me with it.
8 The first section of the letter reads:
9 "Dear Graham:
10 "Ref: Pendleton Spruce Court - Kooltherm K15
11 "In reference to our telecom(sic) of 13/08/2014
12 regarding the use of Kooltherm K15 in Pendleton Spruce
13 court in a façade that has a habitable space 18 metres
14 or more above ground level; we can confirm from checking
15 through the build-up listed in the query form (attached
16 separately) Kingspan Insulation Limited are happy that
17 the build-up you propose is suitable to include K15.
18 "Kingspan Insulation Limited have a comprehensive
19 bank of third party accreditation /LABC registered
20 details and successful testing to both BS 8414-1 and
21 BS 8414-2. As discussed documentation relating to
22 BS 8414-2 is with the testing facility ..."
23 Then halfway down that paragraph, he says:
24 "In order for things to progress Kingspan Insulation
25 Limited would like for you to take this letter as

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1 confirmation that Kooltherm K15 has been specified
2 correctly and the façade build ups of this project
3 follow suit with the requirements of approved
4 document B's alternative compliance route and therefore
5 Kingspan Insulation Limited's test regime carried out at
6 the BRE."
7 This letter is a straightforward and clear
8 confirmation, I would suggest, of correct specification
9 and compliance of the particular external façade
10 build-up by Kingspan, isn't it?
11 (Pause)
12 A. It appears that way, yes.
13 Q. It's right, isn't it, that the K15 which is actually
14 going to go into the structure at Pendleton Spruce Court
15 had not in fact been successfully tested under BS 8414?
16 (Pause)
17 A. Yes, that's correct.
18 Q. And therefore this letter was misleading.
19 (Pause)
20 A. I would agree.
21 Q. Now, this query form is completed, sent to Kingspan
22 in July 2014, as we've seen, and this letter is
23 August 2014, so this is just about a year before the
24 routes to compliance document was released, wasn't it,
25 as a matter of chronology?

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1 A. Yes.
2 Q. As we've seen, this project, certainly Pendleton Spruce,
3 was clad in Reynobond panels.
4 Were you aware by 2015 that the Reynobond panels
5 were actually ACM panels with a PE core?
6 A. No, I don't think so.
7 Q. Do you dispute the fact that they were in fact ACM
8 panels with a PE core?
9 A. No, I don't know what the core was on them.
10 Q. Let's just have a look and see a document, see if it
11 jogs your memory at all, {MET00040563}, please. This is
12 an email run in April 2018 from Graham Smith at Simco.
13 If we go to page 2 of the email chain {MET00040563/2},
14 we can see that here is an email from Liam Harper on
15 4 May 2015 to Grahame Byrne at Genius Facades, copied to
16 Peter Froehlich. I just mention that for the moment for
17 different reasons.
18 He says:
19 "EXT: RE: Reynobond PE switch from transparent core
20 to black core - deadline 4/05/2015.
21 "Peter,
22 "The only project that we have ongoing would be
23 Pendleton. With this in mind any material for the
24 following blocks will need to be the transparent core as
25 previous:

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1 "Spruce Court ...
 2 "Hornbeam ...
 3 "Whitebeam ...
 4 "Thorn ...
 5 "Malus ..."
 6 Those are all Pendleton blocks, aren't they?
 7 A. I don't know.
 8 Q. You don't know?
 9 A. No.
 10 Q. All right. You don't know and I'm not suggesting for
 11 a moment that you would have seen this email at the
 12 time. But looking at that, it appears, at least, that
 13 the Reynobond ACM panels going on to the
 14 Pendleton Spruce building were ones with a PE core.
 15 Are you telling us you weren't aware of that in 2015
 16 when you used the Pendleton Spruce as your case study?
 17 A. No.
 18 Q. Right. Did you not think it incumbent on you as head of
 19 marketing and, by August 2015, head of technical as well
 20 to ensure that you were not promoting the use of K15 or
 21 other products with an ACM PE core?
 22 A. No. It wouldn't have occurred to -- not to me.
 23 I wasn't aware of the differences in the ACM options.
 24 Q. Right.
 25 Can we go back, then, to the routes to compliance

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1 document and look at another case study, page 10 now.
 2 This is {KIN00003148/10}, please. Here is another case
 3 study, Brook House, Rivers Apartments, Tottenham, and
 4 the first paragraph says:
 5 "Kingspan Kooltherm K15 Rainscreen Board has been
 6 installed as part of a multi-million pounds development
 7 in North London, providing 222 new affordable dwellings
 8 along with commercial space and a new primary school."
 9 Then just above the image of the façade on the same
 10 page, we can see some text which says:
 11 "For the Rivers Apartments Gypcraft installed 60 and
 12 100 mm Kingspan Kooltherm K15 Rainscreen Board within
 13 a steel frame infill system. To complete the building
 14 envelope, Gypcraft then fitted an aluminium composite
 15 material façade."
 16 Did you know that that project also featured K15
 17 along with an ACM panel with a PE core?
 18 A. No.
 19 Q. Or at least, if not a PE core, an ACM façade, as you can
 20 see from that?
 21 A. Yes, from the aluminium composite.
 22 Q. Did you investigate what the composite material was with
 23 the aluminium?
 24 A. No, I didn't.
 25 Q. Can we then go to {KIN00007769}, which is an email you

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1 sent to John Garbutt about this building,
 2 Rivers Apartments, Tottenham, shortly after the
 3 Grenfell Tower fire, on Sunday, 25 June 2017, and you
 4 say:
 5 "Hi John,
 6 "I have been reviewing the [case] studies on the
 7 website and Cathy has been providing some info ..."
 8 Is that Cathy Barlow from Smith Goodfellow PR?
 9 A. Yes, that would be, yes.
 10 Q. "... (see attached word doc with all above 18 meter case
 11 studies on, thought you may need for meeting tomorrow)
 12 however as I was going through this process alarm bells
 13 rang when we established that Rivers apartments is also
 14 called Brookhouse.
 15 "Brookhouse is featured in the first edition of our
 16 routes to compliance bulletin as a case study but not
 17 the latest.
 18 "Last week we were contacted via Jack Ditton (KIL
 19 Area sales manager) by the contractor (Galliford Try
 20 Partnerships) in relation to this project, searching for
 21 answers. Apparently the client (Newlon housing
 22 trust/Haringey council) had contacted them, and they are
 23 worried about the build-up, and are looking to see if we
 24 have any desktop studies featuring this material. They
 25 have told Jack they are the PE core panels.

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1 "Recalling my conversations with Adam, apparently
 2 the original desk top study (by Exova) was for FR core.
 3 We planned to respond, in essence saying that we could
 4 not do this, but I know they contacted Exova directly
 5 also, we were intrigued to see what Exova would say, not
 6 heard what their response is yet.
 7 "I will dig out our actual response and more details
 8 on the DST, but will need to be tomorrow as it came from
 9 Adam."
 10 Was there in fact a desktop study by Exova? I ask
 11 because we've not been able to find it.
 12 A. Oh, I was under the impression there was one for an FR
 13 core at this point.
 14 Q. Right. What were you under the impression from?
 15 A. I think from discussions with Adam. I think Adam had
 16 had the direct discussion --
 17 Q. Is that Adam Heath?
 18 A. Yes.
 19 Q. So you had a discussion with Adam Heath about it, did
 20 you?
 21 A. Yes.
 22 Q. Is one reason why you couldn't locate a desktop study,
 23 or perhaps we can't locate a desktop study in your
 24 disclosure, that you wouldn't have prepared one for K15
 25 with ACM panels with a PE core?

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1 A. We wouldn't have done, no.
 2 Q. No.
 3 A. They may have obtained one for themselves.
 4 Q. Right.
 5 A. But unlikely with a PE core, in our experience.
 6 Q. Unlikely with a PE core in your experience, why?
 7 A. Because I think when we were looking at desktop studies,
 8 Exova would only do FR-rated cores, they wouldn't do
 9 PE-rated cores.
 10 Q. How far back in time was that experience of yours?
 11 A. Oh, I think ... I can't recall exactly. I think
 12 I mention it in my witness statements.
 13 Q. Not further back than June 2014, clearly?
 14 A. I don't think so.
 15 Q. Is that because, leave aside the industry, Kingspan's
 16 view was that K15 should never be used with an ACM PE
 17 core as the exterior rainscreen?
 18 A. I think we weren't particularly au fait with the
 19 difference in fire performance between a PE, an FR or
 20 an A2. Obviously they were -- there was a difference,
 21 but I don't think we had an appreciation for what that
 22 difference might be.
 23 Q. Right.
 24 A. But obviously the fire engineering community doing the
 25 desktop studies had got a better understanding.

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1 Q. Right.
 2 Were you aware of any desktop studies being done
 3 with a system or in relation to a system using K15 and
 4 ACM with a PE core after July 2016, when the NHBC
 5 amended their guidance to allow aluminium rainscreen
 6 façades without a desktop?
 7 A. I can't recall at the moment.
 8 Q. Let's look at a further example. The same document,
 9 page 14 {KIN00003148/14}. This is a building called
 10 The Fold in Sidcup, Kent. This is described as follows:
 11 "A stunning new 6,500 sq.m mixed-use development in
 12 Sidcup is the latest project to benefit from the
 13 outstanding thermal performance provided by Kingspan
 14 Insulation's Kooltherm K15 ..."
 15 Do you see that?
 16 A. Yes.
 17 Q. The building is described as a 29-metre building, so
 18 it's a high-rise.
 19 Do you remember that this building came to your
 20 attention in April 2015 because of a complaint being
 21 raised on the wording of a draft press release which
 22 also featured The Fold as a case study? Do you remember
 23 that?
 24 A. I don't recall it.
 25 Q. All right, let's look at {KIN00008262}, please. This is

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1 a draft press release, "Development sets the gold
 2 standard with Kingspan", 3 March 2015. This is about
 3 the "stunning new 6,500m2 mixed-use development in
 4 Sidcup". Do you see that?
 5 A. Yes.
 6 Q. The text looks fairly familiar.
 7 Can we go to the email chain about this document at
 8 {KIN00008261}, please. The first email on that page
 9 there is from you to Tony Millichap of 28 April 2015,
 10 where you say:
 11 "Guys
 12 "Please see note below regarding a case study on K15
 13 we are trying to get through. I think this needs to be
 14 looked at and responded to urgently."
 15 If you run your eye down the page, you can see that
 16 you're responding to an email from Cathy Barlow the same
 17 day, and she is sending you the information about the
 18 complaint and asking you to get in touch with
 19 Juan Alberts from KDS Associates, and you can see that
 20 from the last email in the chain, and the project he is
 21 talking about is The Fold.
 22 If you look at the bottom of the page, page 1, he
 23 was saying he wasn't happy with the draft because of
 24 this sentence, and over to the top of page 2
 25 {KIN00008261/2}, you can see that there is an extract

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1 from the press release that we've just looked at very
 2 briefly indeed, and there are two parts which are
 3 highlighted in yellow. He has highlighted the part that
 4 says:
 5 "The product has also been successfully tested to
 6 both BS 8414:2002 and BS 8414:2005, and can meet the
 7 criteria within BR135."
 8 Do you see that?
 9 A. Yes.
 10 Q. Then there is another part he didn't like.
 11 Underneath that extract, Sophie Fox at
 12 Smith Goodfellow, who is sending this email on, says:
 13 "He said that they've always used Kingspan products
 14 in the past but that they're having issues with K15 at
 15 the moment because the Local Building Control have said
 16 K15 was unacceptable for testing by the NHBC. Main crux
 17 of it is that because the K15 board burns it didn't
 18 pass; 'Successfully tested' therefore is wrong."
 19 You see that?
 20 A. Yes.
 21 Q. You then get that and, as I have shown you, you send it
 22 to Mr Millichap and Mr Meredith.
 23 Do you know how this complaint was dealt with?
 24 A. I can't recall, no, I don't.
 25 Q. Do you know what the outcome was in relation to the

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1 press release?

2 A. No, I don't recall.

3 Q. If we go back to page 14 of the routes to compliance

4 document at {KIN00003148/14}, we can see that

5 Juan Alberts from KDS Associates is quoted in red there,

6 do you see? And we can see that the first offending

7 sentence of which Mr Alberts complained about passing

8 8414 does not feature, but the second one does, fire

9 performance does.

10 So you responded to Mr Alberts' complaint about

11 representing Kooltherm K15 as having passed the relevant

12 test. Was that because you had been, as it were, outed

13 and didn't want to put something out that somebody who

14 was related to this building knew was misleading and

15 would complain about if you persisted?

16 A. No, I think we just complied with his request not to use

17 that description in the document, and that's what we

18 did.

19 Q. You didn't take out the second part of which he

20 complained which relates to the fire performance,

21 because it says, "we knew we could rely on the product

22 to deliver both the thermal and fire performance we

23 required". I showed you, admittedly quite quickly, that

24 there were two parts of the press release that he

25 complained about. The second related to fire

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1 performance.

2 Do you know why that remained in there even though

3 he had complained about it?

4 A. I don't.

5 Q. Can we now go to {KIN00006676}, please. This is

6 an email where we see at the top of the chain you

7 writing to Richard Burnley and Richard Bromwich, copying

8 in Reshma Roodurmun, on 24 July, attaching the draft of

9 the routes to compliance technical bulletin, and you

10 say:

11 "Gents

12 "We have now (finally I know) got the bulletin ready

13 for final review!

14 "Although we have struggled with case studies and

15 people refusing because of the issues, we have included

16 3 off to kick off the document."

17 Why had you been struggling with the case studies?

18 A. I think potentially because people didn't want to

19 highlight how their buildings had got built potentially,

20 and I know Smith Goodfellow were just getting people not

21 wanting to talk about their properties.

22 Q. When you say people refusing because of the issues, what

23 issues?

24 A. I can't recall exactly what I meant by "because of the

25 issues".

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1 Q. Were some of the issues the fact that NHBC were not

2 allowing K15 to pass?

3 A. It might be.

4 Q. Right. Okay. You say it might be; was that one of --

5 A. Potential.

6 Q. -- those factors?

7 A. Potential, yes.

8 Q. Now, you sent the first draft, as we've seen, I think,

9 to Cathy Barlow of Smith Goodfellow in May 2015, and

10 we've now come to July 2015 and here is the final draft.

11 Is it safe for us to proceed on the basis that you

12 and your team have worked on this document now for the

13 two intervening months, May to July 2015?

14 A. Yes, that's correct.

15 Q. Can we go to your second witness statement, then, and

16 look at page 50 {KIN00020824/50}, please. You can see

17 Inquiry question 23 in the middle of the page, which

18 goes as follows:

19 "As far as you were aware, prior to 14 June 2017,

20 had K15 been used in any external cladding system

21 incorporating ACM panels with a PE core (other than

22 Grenfell Tower)?

23 And:

24 "As at 14 June 2017, I was not aware of K15 having

25 been used in any external cladding system incorporating

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1 ACM panels with a PE core."

2 Now, you were aware, I think, that Pendleton and

3 Brook House, from the marketing literature, were

4 external cladding systems incorporating ACM panels,

5 weren't you? Because that's clear from the documents.

6 A. Yes.

7 Q. So when you say you weren't aware of incorporation of

8 ACM panels with a PE core, your denial there is only in

9 relation to the PE core, isn't it?

10 A. Yes, I think --

11 Q. So you were taking the question as a whole and answering

12 it literally.

13 A. Yes.

14 Q. You hadn't seen a desktop study which had extrapolated

15 the safety of the systems actually being used in any of

16 those three case studies I've shown you, had you?

17 A. I don't think so.

18 Q. Was it safe at the time, did you think, to present these

19 case studies to the market without either an applicable

20 BS 8414 test for each of those systems, or without

21 a desktop study that you had seen for each such case?

22 A. I didn't think we necessarily needed to see them. We

23 would have assumed that they'd taken an appropriate

24 route to compliance for that particular building.

25 Q. So anyone reading your routes to compliance document

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1 would have to make an assumption that a desktop existed
 2 for the build-up in place in those buildings, or
 3 a compliant and successful 8414 test?
 4 A. That's correct.
 5 Q. But you didn't take the trouble yourself to find out
 6 whether either of those conditions pertained?
 7 A. No, I didn't.
 8 Q. Was that not risky?
 9 A. No, I would just assume that if they were built, they
 10 would have taken one of those routes.
 11 Q. I want to turn to Ivor Meredith's disciplinary and
 12 appeal hearings, if we can, please.
 13 Now, you, I think, held a disciplinary meeting with
 14 him on 17 and 18 August 2015, didn't you?
 15 A. Yes.
 16 Q. And you made the decision to terminate his employment on
 17 19 August 2015.
 18 A. That's correct.
 19 Q. It's right, isn't it, that Ivor Meredith then appealed
 20 that termination and met Richard Burnley, who was the
 21 managing director of Kingspan, on 3 September 2015 with
 22 Elaine Gale from human resources?
 23 A. I believe so, yes.
 24 Q. And at that appeal hearing, his termination was upheld,
 25 wasn't it? That's the brief story.

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1 A. Yes.
 2 Q. Now, you have been asked by these meetings by
 3 the Inquiry and you have responded in your third witness
 4 statement to that. I think you agree that, in relation
 5 to the meetings which you were involved in, the notes
 6 taken at those meetings are an accurate representation
 7 of what was said. Have I got that right?
 8 A. Yes, as far as I can recall.
 9 Q. Yes. Absolutely.
 10 Now, let's look at the notes of the disciplinary
 11 meeting from 17 August, first of all, {KIN00022322}, and
 12 let's look at the first page just to orientate ourselves
 13 in what we're looking at. It's a formal document,
 14 "Statement/interview document". "Interviewer:
 15 Adrian Pargeter", that's you, "Position: Head of Tech
 16 and [Marketing]", "Date: 17 August", "Interviewee:
 17 Ivor Meredith". Susan Ewart was the management rep
 18 there, and this is one of 18 pages.
 19 If we go to page 9 {KIN00022322/9}, at the second I,
 20 three lines down, Mr Meredith is noted as saying in
 21 relation to a meeting with the NHBC in 2014:
 22 "I had to be careful, a lot of responsibility.
 23 Tricky line, some would question playing in market not
 24 suitable for."
 25 Now, you have said in your third witness

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1 statement -- and we don't need to go to it, but if you
 2 want to, we can, it's paragraph 2.10 at the bottom of
 3 page 5 in that document {KIN00022610/5} -- that you
 4 believed here that Mr Meredith was referring to K15 and
 5 its use above 18 metres. Can you confirm that?
 6 A. Yes, that's correct.
 7 Q. Now, taking into account the lack of fire testing on
 8 standard K15, and the results that you had encountered
 9 in the class 0 testing, did you believe that Kingspan
 10 had been specifying K15 in a market that it wasn't
 11 suitable for?
 12 A. I didn't believe that, no.
 13 Q. So is it right that Mr Meredith was telling you
 14 something that you didn't believe was true or correct?
 15 A. No, he said "some people".
 16 Q. Right, "some would question playing in a market not
 17 suitable for"?
 18 A. Yes.
 19 Q. I see. But you weren't one of those people?
 20 A. No.
 21 Q. Right.
 22 Let's turn to page 10 of 18 {KIN00022322/10}, next
 23 page, and look at the sixth line. He says there, after
 24 "group chair":
 25 "Business put me in a very difficult position last

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1 year, it was doing my technical integrity no good + say
 2 that our product was ok, my mission was to derail whole
 3 process + not much fun."
 4 Do you see that?
 5 A. Yes.
 6 Q. "Pretend you are stupid. Got a bit of help from
 7 Matt Ball, reams of paper coming through on a monthly
 8 basis, I daren't miss anything."
 9 Now, you say in your witness statement that you
 10 thought those comments were being made in relation to
 11 Kingspan K5; is that right?
 12 A. That's correct.
 13 Q. Okay. Why K5 only and not also K15?
 14 A. Because in the lines above, he's very specific there
 15 about K5 issues, governor of PU Europe, or convener of
 16 PU Europe. So he is talking there about the EW1 issues,
 17 not K15 issues.
 18 Q. We can find the reference if need be, but Mr Meredith
 19 said that he was talking about K15 as well as K5 there.
 20 A. That was not my interpretation of that.
 21 Q. Not your interpretation of what he said at the time, or
 22 not your interpretation of the note?
 23 A. Both.
 24 Q. Right.
 25 Looking at page 14 {KIN00022322/14}, the first I

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1 there in the middle of the first line, he says:
 2 "I have to be on top of it."
 3 Then looking at the second I, he says:
 4 "Time, definitely, K15 project making sure none of
 5 that being pulled off wall, my main goals + this one was
 6 failing, not sure of answers + not sure what to do,
 7 making up as going a lot, I was trying to keep it on
 8 track + PW could complain."

9 Now, you say at paragraph 2.13 of your third witness
 10 statement {KIN00022610/6} that you thought Ivor Meredith
 11 was referring to a large number of high-rise projects
 12 which were live which he was keeping track of. Now,
 13 that was about 200 projects or so, wasn't it?

14 A. I believe it was of that order, yes.

15 Q. Let's go to your third statement at paragraph 2.13,
 16 page 6 in that. You say there in the fourth line down:

17 "I believe that for each of the projects on this
 18 list, Insulation UK had to provide test and
 19 certification evidence for consideration by the project
 20 architects / fire engineers to support the use of K15
 21 above 18m in the proposed application, as required by
 22 the NHBC, otherwise K15 would not be used."

23 Now, how could Kingspan do that? How could Kingspan
 24 provide test and certification evidence for
 25 consideration by project architects, fire engineers, in

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1 all these projects?

2 A. It was providing whatever evidence we'd got in terms of
 3 the 8414 testing.

4 Q. How could Ivor Meredith or anyone sensibly be given the
 5 role of trying to ensure the use of K15 on every
 6 project?

7 A. It was a lot of projects that were starting to come in
 8 or had started to come in, so it was a -- it was a big
 9 problem at the time.

10 Q. Yes. Indeed, it was a big problem, wasn't it, because
 11 without any BR 135 certificate in place for any build-up
 12 using standard K15, there was no certification or any
 13 evidence which could support the use of K15 in any of
 14 these projects?

15 A. It was just the BS 8414 data that we'd got at the time.

16 Q. Exactly, which Mr Meredith knew at the time, and you
 17 have confirmed, was in fact a test done on a different
 18 product.

19 A. Yes, that's correct.

20 Q. Yes.

21 You go on in your statement to say:

22 "Although Ivor had the technical knowledge to answer
 23 these questions, Insulation UK had not necessarily had
 24 to provide equivalent information previously and so he
 25 was determining appropriate responses as queries were

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1 received. I think it was this lack of standard
 2 templates that Ivor was referring to rather than
 3 suggesting that there was any fabrication of the truth."

4 Now, we've seen that it clearly was a fabrication of
 5 the truth rather than lack of templates, wasn't it?

6 A. At the time I didn't think that.

7 Q. At the time of what?

8 A. Of his hearing.

9 Q. You didn't think that, but he was telling you that.

10 SIR MARTIN MOORE-BICK: Can we go back to the notes of the
 11 interview?

12 MR MILLETT: Yes. Certainly.

13 Can we go back to the note, page 14

14 {KIN00022322/14}. What did you think he was talking
 15 about in the middle of the page?

(Pause)

17 A. Yeah, I think he was talking about responding to the
 18 queries that were coming in.

19 Q. Right.

20 Well, let's move on through the notes. Can we go to
 21 page 15 {KIN00022322/15}. At the second I, he says:

22 "Time [flies], my priorities sat with live projects,
 23 shared by TM [that's Tony Millichap]. Kept me sweet,
 24 damaged my integrity when just being told to book
 25 a test, so £50k wasted each time. Might take longer +

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1 work's all that matters, in my eyes anyhow."

2 So you were aware at that point that, of course,
 3 he'd been to NHBC meetings with Mr Millichap. Were you
 4 aware at that point of the pressure Ivor Meredith was
 5 under? That's clearly what he is telling you here,
 6 isn't it?

7 A. Yes, I knew when I -- not long after I took over that,
 8 you know, he was extremely busy.

9 Q. And you knew the background to this, because you knew
 10 there was a threat by the NHBC --

11 A. NHBC, yes.

12 Q. -- that they would not continue to approve K15 because
 13 of the lack of fire testing; that's right, isn't it?

14 A. That's correct.

15 Q. And this is so certainly by the middle of 2015.

16 Was it Ivor Meredith's responsibility to produce
 17 successful fire tests to satisfy the NHBC?

18 A. It was -- yes, it was part of his responsibility, yes.

19 Q. And when Mr Millichap left, was Ivor Meredith given any
 20 support for that work?

21 A. I actually proposed that we take on a fire engineer to
 22 help support Ivor in his role, because he was managing
 23 a team of people, and I could see he needed some
 24 support, I could see he -- and it was the fire side of
 25 the projects that he needed support on, so I suggested

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1 we recruit a fire engineer to support him.
 2 Q. Now, by this time you had been head of technical for
 3 three months or so. Did you not recognise the situation
 4 that Mr Meredith was describing here? Did you not begin
 5 to have an inkling as to what he was telling you?
 6 A. An inkling of what?
 7 Q. Well, let's look at the middle of page 15. He says:
 8 "... damaged my integrity when just being told to
 9 book a test."
 10 What did you think he was talking about?
 11 A. I don't know about damaging his integrity, but I guess
 12 he was saying that he wasn't being given any direction
 13 or support previously.
 14 Q. Did you not take away from this interview at least the
 15 impression that Ivor Meredith was under pressure to
 16 produce successful 8414 tests for K15 for the simple
 17 reason that there wasn't a reliable test for K15 under
 18 8414 that could be used to pacify the market or placate
 19 NHBC?
 20 A. No, not at that point, but I think that there wasn't
 21 enough evidence.
 22 Q. Right.
 23 Well, let's look at the appeal hearing at
 24 {KIN00008681}. These are the notes, similar template,
 25 3 September 2015, "Chair: Richard Burnley", "Others

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1 Present: Elaine Gale".
 2 You weren't present at the meeting, but did you get
 3 to see these meeting notes afterwards?
 4 A. No, not directly afterwards.
 5 Q. How long afterwards?
 6 A. It was, I think, September 2017 when I saw these.
 7 Q. Right, okay.
 8 Now, if we go to page 5 {KIN00008681/5} and pick it
 9 up from the second EG there, she says:
 10 "EG: As I understand it your role, or the work that
 11 you do has been fairly critical in terms of Kingspan's
 12 product being approved, in terms of fire safety?
 13 "IM: Yes I would say that I have been put in
 14 a situation where I have had to maintain performance
 15 that perhaps our products don't deserve. I have the
 16 ability to show that our products can be used in areas
 17 where you [would] normally require material which would
 18 be non-combustible; from a critical lifesaver
 19 perspective. I have performed in a number of tests in
 20 2005, Kingspan changed the technology of our foam and we
 21 couldn't repeat those tests. We were outed by
 22 a consultant who we then had to fabricate a story to
 23 that the product still said what it did not the tin.
 24 Although I bucked at that point and said to my manager,
 25 at the time, that we are stretching the truth here and

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1 what we are going into an area ... where we cannot
 2 support the performance of the product. I wasn't the
 3 senior person there, we produced documentation and we
 4 inferred to the industry that our product could do
 5 something that potentially it couldn't.
 6 "EG: With respect, this was 10 years ago.
 7 "IM: No this was about 8 years ago now.
 8 "EG: You just said to me that this as 2005.
 9 "IM: This was when the testing was done. What's
 10 happened in the last 18 months, longer than that
 11 actually, a lot of those projects that we have sold
 12 into have started to come back and start to question
 13 that performance. I have been under a great deal of
 14 pressure to actually maintain that performance when it
 15 is evident through testing that our product struggles
 16 with that. We have obviously had to ... I have been very
 17 busy doing a large amount of testing, there was
 18 technology that could pass, but we were struggling to
 19 get the technology to pass, to justify our lie."
 20 Now, you agree in your third statement at
 21 paragraph 3.5 -- page 17 {KIN00022610/17}, if you want
 22 to go to it -- that Mr Meredith is talking about K15
 23 here. That's right, isn't it?
 24 A. Yes.
 25 Q. We looked at this earlier on in your evidence, but

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1 having undertaken the work in reviewing the historic
 2 fire testing of K15, you do recognise that Mr Meredith
 3 is here explaining the issues that Kingspan had when
 4 they changed from old technology to new technology.
 5 A. Yes.
 6 Q. Yes.
 7 A. I believe so.
 8 Q. It's right, isn't it, he is right, that Kingspan were
 9 struggling to get K15 to pass an 8414 test which they
 10 claimed that they had in the marketing material; that's
 11 correct, isn't it?
 12 A. No, I think we -- they'd got the passes but there are
 13 obviously those Sotech tests that I think he may have
 14 been referring to there.
 15 Q. Right. When he said to Mr Burnley at that hearing that
 16 you inferred to the industry that the product could do
 17 something that potentially it couldn't, and then goes on
 18 in the next passage to say, "doing a large amount of
 19 testing ... struggling to get the technology to pass, to
 20 justify our lie", the lie there was that K15 had passed
 21 a full-scale 8414 test when, in fact, what was being
 22 sold had not, isn't it?
 23 A. I think, yeah, potentially that was what he was talking
 24 about.
 25 Q. Do you agree, looking back on it, that Kingspan had been

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1 stretching the truth, to put it mildly, of the
2 performance of K15?

3 (Pause)

4 A. I'm not sure it was stretching the truth, but it was
5 providing the evidence of the testing, but then,
6 you know, trying to support projects that were not
7 strictly in line with that test evidence.

8 Q. It's right, isn't it, that Ivor Meredith was under
9 pressure to perpetuate falsehoods when and because K15
10 kept failing full-scale fire tests?

11 A. I don't think he was perpetuating falsehoods, but he
12 was -- for want of a better phrase, he was hamstrung by
13 the test evidence he'd got at the time to cover the
14 range of applications that were starting to come
15 through, or had started to come through. I'd agree with
16 that.

17 Q. Let's look at page 7 {KIN00008681/7}, in the middle of
18 the page there, or about two-thirds of the way down, he
19 says -- and it's hard to find. You can see there is
20 a large black redaction mark, and five lines below that
21 he says, in the middle of the paragraph:

22 "... because my boss Tony Millichap was moving to
23 another job role, so in his last month he removed all of
24 his responsibilities and said 'that's your choice now'.
25 There was no-one out there ... that was no specialist in

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1 the marketplace. It was on my shoulders to make all of
2 the decisions, and if anything I kept our heads above
3 water during that time, and although I might have been
4 accused of parking some of my important projects, at
5 least the 230 high rise buildings that were being, that
6 could have asked to remove the Kingspan insulation off
7 them, they were never, as far as I am aware, we managed
8 to evade the problem. Kingspan couldn't say that we
9 were completely happy with the construction because we
10 weren't ... we couldn't high-light it to the person we
11 sold it to and the person at NHBC that it was an issue,
12 so I mean Adrian was very busy as soon as he took over
13 the role, sales team. I like to think they were pulling
14 fast ones, they were pushing [Optim-R] into inverted
15 roofing which was not acceptable, they were pushing Tech
16 into flat roofing, which was not acceptable, there were
17 a number of things that were obviously being slipped,
18 they were taking advantage of Adrian's new position.
19 Unfortunately, I kind of took that responsibility on
20 myself, to show Adrian why these things were an issue
21 and high-light them to him."

22 What do you say about that? What do you say about
23 him highlighting these issues to you?

24 A. He's -- I believe there he's referring to -- can you go
25 back a page?

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1 Q. Yes, go back to page 7, please.

2 A. So he is talking about these projects here, tech into
3 flat roofing and Optim-R, and I think what he is trying
4 to say is that the sales team were looking to try and
5 get applications supported by the technical team
6 which -- to sort of expediate(sic) these applications
7 through the technical team without a thorough review,
8 and so he felt -- that's what I interpret into that --
9 that they potentially saw an opportunity in me, who was
10 new in the role, and not experienced in all of these
11 different applications, that they may be able to do
12 that. I don't think this was true, but obviously it
13 seemed like his perception. So he felt he was having to
14 block those attempts, is the way I read that.

15 Q. We've seen quite a lot of this, and I know you were not
16 at this hearing and didn't see the transcript until
17 later; did Richard Burnley come to you after this
18 hearing in early September 2015 and ask you yourself
19 about what you knew of what Mr Meredith was telling him
20 about not doing what it said on the tin, "justifying our
21 lie", and matters of that nature?

22 A. No, we never had a discussion about the detail.

23 Q. Did you have a discussion about generalities?

24 A. Just about his overall demeanour and how he was, and,
25 you know, I was interested to see what Richard's opinion

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1 was on whether he agreed with my decision to dismiss.

2 Q. Richard Burnley didn't say to you, "Well, he has told us
3 some extraordinary stuff about being under pressure,
4 having his integrity compromised and justifying a lie of
5 some kind, and he explained to me that he'd told you all
6 about it"? Richard Burnley didn't come back and ask you
7 any of the detail; is that right?

8 A. No, I think Richard would have been aware that Ivor was
9 under pressure, so I think he would have already been
10 aware of some of that.

11 Q. And did Richard Burnley come back to you and ask you or
12 tell you that he had been told that K15 had changed
13 after the BS 8414 test in 2005?

14 A. No.

15 Q. When you saw this appeal note in September 2017, as you
16 say you did for the first time, were you not surprised
17 that Mr Burnley had not actually asked you about any of
18 these things or told you about what Mr Meredith had told
19 him?

20 A. Erm ... well, I don't recall whether I've thought that
21 or not at the time.

22 Q. Right.

23 Do I take it that, whatever Richard Burnley did or
24 didn't tell you about this appeal hearing, regardless of
25 what we now see Mr Meredith said in these notes, both

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1 the disciplinary hearing and the appeal hearing, no
 2 internal investigation was done after September 2015 to
 3 follow up on what Mr Meredith had said to you, to try to
 4 understand what issues he was facing and why, and to
 5 interview other people in the technical team, and indeed
 6 the marketing team, to find out whether there was any
 7 truth in what he was telling you?
 8 A. I think from the original dismissal hearing, I don't
 9 think there was anything new in what he was saying there
 10 that was new to me. I was aware of the projects coming
 11 through, I was aware of the workload, I was aware of his
 12 team feeling under pressure, so my immediate steps --
 13 and I tried to take those steps even before he left ,
 14 say, with trying to support him with a fire engineer,
 15 which he didn't like the idea of, really , but -- and
 16 I continued to pursue that and we did eventually employ
 17 a fire engineer who was doing a Master's, and
 18 I appointed Adrian Brazier into the role to bring some
 19 steadiness and some continuity into the team, which was
 20 Adam Heath, who he mentions was under pressure, and
 21 I think Adam was certainly feeling it , but my impression
 22 he was feeling that he just never got any support from
 23 Ivor, never knew where Ivor was, and it all started to
 24 settle down once Adrian Brazier was in place.
 25 So I'd already started to take actions, and we

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1 continued with that after Ivor left .
 2 Q. Did Richard Burnley tell you that he'd been told by
 3 Ivor Meredith that that Kingspan changed the technology
 4 of the foam and it couldn't repeat the tests?
 5 A. No.
 6 Q. He didn't?
 7 A. No.
 8 Q. Is that because, and I know you can't look into
 9 Mr Burnley's mind, but -- perhaps I shouldn't ask you.
 10 Can you explain why it is that he wouldn't have told you
 11 that, given that it wasn't something that you, you say,
 12 learnt until 2016?
 13 A. I think maybe because it was old news, if you like , it
 14 was ten years before, so he may have assumed that that
 15 was sorted out at the time.
 16 Q. But it was clearly relevant in 2015 because it was
 17 something that Mr Meredith was putting at the heart of
 18 his problem with it?
 19 A. Yes, agreed.
 20 MR MILLETT: Mr Chairman, I've come to the end of this line .
 21 There may be one or two further questions on it , but
 22 I can look at those overnight and maybe shorten those.
 23 SIR MARTIN MOORE-BICK: Yes.
 24 MR MILLETT: I have come to a natural break, I think.
 25 SIR MARTIN MOORE-BICK: Well, that would be a good time to

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1 stop, because not only is it the end of the afternoon,
 2 it 's been a long afternoon for Mr Pargeter, so I think
 3 we should stop there.
 4 MR MILLETT: Yes.
 5 SIR MARTIN MOORE-BICK: Mr Pargeter, I'm afraid there are
 6 more questions we need to ask you.
 7 THE WITNESS: I understand.
 8 SIR MARTIN MOORE-BICK: Although you weren't originally
 9 asked to make yourself available for a third day, I
 10 think you have been warned, have you, that it might be
 11 necessary?
 12 THE WITNESS: Yes, I have.
 13 SIR MARTIN MOORE-BICK: I'm sorry about that. But, yes,
 14 please, we would like you to return tomorrow.
 15 We will resume at 10 o'clock tomorrow, and again,
 16 please don't talk to anyone about your evidence or
 17 anything related to it while you're away.
 18 THE WITNESS: Of course.
 19 SIR MARTIN MOORE-BICK: And we look forward to seeing you
 20 tomorrow.
 21 THE WITNESS: Thank you.
 22 SIR MARTIN MOORE-BICK: Thank you very much.
 23 (Pause)
 24 Very good. 10 o'clock tomorrow, then, please.
 25 (4.35 pm)

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1 (The hearing adjourned until 10 am
 2 on Wednesday, 9 December 2020)
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