Q. Well, let me see if I can do better.  
A. I'm not sure.  

Q. Mr Pargeter, good morning.  
A. Good morning.  

Q. I'm going to ask you now about a campaign called the "Reasons Why" campaign from May 2015. Do you remember the existence of such a campaign?  
A. Yes, I do, yes.  

Q. Can we look at (KIN00008528), please. Here is the first page of a document called "Kingspan Kooltherm K15 Rainscreen Board, Reasons Why Campaign".  

A. I haven't seen this recently.  

Q. No, but now I'm showing it to you, are you familiar with it from that time?  
A. I think so.  

Q. Well, I was hoping you might be able to tell me, but we think it's May 2015. Is that right? Or is it later?  
A. I'm not sure.  

Q. Well, let me see if I can do better.  

Can we go to (KIN00008255), please. This is an email from you to Cathy Barlow, she is the PR person you were engaging at the time, as you told us yesterday.  
A. Yes.  

Q. Wednesday, 6 May 2015. You say:  
"Hi Cathy  
We have now put together a brief of our thoughts on a mini campaign to cover the routes to compliance for K15, addressing the fire issues as previously discussed."

In the next paragraph you say:  
"The main focus is on producing the technical bulletin and we have attempted a basic structure and mind dumped our thoughts around what it needs to say (pages 4–6)."

So it looks as if, looking at the attachments, you had something called version 2 of the routes to compliance document, technical bulletin.

Was this a document that you attached at the time or was created by you at the time?  
A. Well, the routes to compliance is a document that I am aware of, and I think maybe that other document was an early part of that, what became routes to compliance.

Q. Yes, thank you.

Did you commission this routes to compliance document, assuming that that's the one you sent to Cathy Barlow on 6 May?  
A. Yes.  

Q. Right.  

Let's go back to the document, (KIN00008258/2), please, and at the top it says:

"AIM  
• Rebuff NHBC note that has 'allegedly' made the BCB & installer nervous and provide a justifiable counter argument."

Just pausing there, given that K15 would not be suitable for all eventual specifications, this was quite an aggressive objective, wasn't it?  
A. I wouldn't say it was aggressive, but it looked to maximise the campaign.

Q. It says, "Rebuff NHBC note" there in the third bullet point; what was that note?  
A. I don't recall what that note was.  

Q. Do you remember how the NHBC was nervous or allegedly nervous, or rather their views were making the BCB and installers nervous?  
A. I can't recall.

Q. What was the counterargument, do you think, the justifiable counterargument that you were reaching for,
Q. Well, you say "a priority". Only one thing can be a priority, can't it? That's why I phrased the question as I did. Was the message to the customers that they should not regard fire safety as the priority?

A. No, not that they should not regard it as the priority.

Q. So you're saying it should be just one of a number of things treated the same way equally across the board?

A. No, I think fire should be treated as the priority, but not exclusively. It should be there balanced by the other elements as well.

Q. Looking at it another way, the message I think you were looking to get across -- is this right? -- is that you would spin the story so that fire would become less important in the eye of the customer, and that other matters -- thermal performance, et cetera -- would become more important.

A. No, that they would be there as well.

Q. It looks from these words, at least -- is this fair? -- that the document shows us that the basic aim of the campaign was to seek to draw attention away from fire safety in favour of emphasising the benefits of K15, such as thermal performance.

A. Not away from fire safety.

Q. Well, how do you explain, "Spin such that the story is not fire, fire, fire, all the time"?

A. Because it says "all the time". So instead of it being the only element of it, it needed to have, like I say, the balance of the thermal performance and the speed as well. So it's not that it shouldn't be there; it's that it should also have the other elements with it.

Q. How do you explain, "Educate the industry in matters of combustibility ... and its insignificance in terms of individual product performance"? That's not treating fire safety as equal to individual product performance; it's treating it as less significant, isn't it?

A. Yeah, that's not the intention, to reduce the element of fire safety, but, like I say, to make sure that it's not the only topic that we're talking about.

Q. This is a grossly irresponsible message, I have to suggest to you, to send to the market, that customers and indeed building control bodies should regard matters of combustibility as insignificant in the grand scheme of things. Do you accept that?

A. I think, looking at it within the system, whether the products are non, limited or combustible, if the system passes the requirement, then it's a safe system. So...
that’s, I think, where we’re trying to get to there, is that, you know, combustible materials can be used safely, whether -- and against even non and limited combustible products in a system.

Q. Well, yes. Now, you have jumped to a point I’m going to explore in some detail with you, and we’ll explore what you have just said in some detail. But I just want to see if I can get an answer to my question.

Do you accept that telling the industry or educating them with a message that matters of combustibility were insignificant in terms of individual product performance in the grand scheme of things was grossly irresponsible?

A. I don’t think it was grossly irresponsible because I don’t think that was the intention; it was, like, I say, to balance it with the other factors.

Q. Let’s move down the page. “Tactical Output”, first bullet point:

“Technical Bulletin - Fire Safety in Rainscreen Clad Buildings with a Storey 18m or Greater Above Ground Level: Routes to Compliance using Kingspan Kooltherm K15 Rainscreen Board.”

I think we then go to page 4 (KIN00008258/4) in this document. This is the “Proposed Content”, technical bulletin, so this is part of the same document.

Again, you saw this at the time, did you, early May 2015? It looks like an early version of the technical bulletin that of course was published in August, but was attached to your email to Ms Barlow on 6 May.

A. I may have done. I mean, that previous document, I don’t recall at all, so that may be that it was early correspondence with the marketing team with Cathy. So this may be the same as well.

Q. Okay. It all looks part of the same document, which is why this is on page 4, but on page 5 (KIN00008258/5) we can see a heading “Regulatory considerations”, can you see that? And it says here:

“Requirements in Great Britain - England & Wales and Scotland.”

Then the last bullet point in that list says this: “Plant seed of doubt without crossing any lines that i.e. that it is possible to specify a component that is, to all intents and purposes, compliant with the individual product performance requirements of ADB2 and THB2 [Technical Handbook 2 in Scotland], but which, when built into a system, would fail the rigours of the large scale tests because of the complexity of the interactions between the various components.”

That’s I think the point you were making earlier, wasn’t it, about systems?

A. Yes, I think it is.

Q. When it says, “Plant seed of doubt without crossing any lines “, what was going on there? What does that mean?

A. I don’t know. I don’t recognise this.

Q. You don’t recognise the document or you don’t recognise the language?

A. Well, this document.

Q. It seems to have come from your department, though, and originated with your department, and at this time --

A. Yeah.

Q. -- you were or at least about to become head of technical as well as head of marketing.

A. Yeah.

Q. So given that it was marketing, it was already within your dominion, wasn’t it?

A. Yes, yes.

Q. So can we proceed on the basis, Mr Pargeter, that you were responsible for it?

A. Can you then explain, just going back to my question, what, “Plant seed of doubt without crossing any lines” was intended to mean or reflect?

A. I can’t. Like I say, I don’t recognise this.

Q. Right.

Was the idea that the aim of the campaign was to get customers and regulators, such as there were any, institutions, building control bodies, to start to doubt whether the label of “non-combustible” or “limited combustibility” were really reliable, but on the other hand to promote system tests, the alternative route to compliance?

A. I think it could well be, because I think it was our belief that system testing rather than reliance on individual product performance is a safer way to proceed, particularly in high-rise buildings, rather than just relying on the individual classification of a given product.

Q. Was this targeted as Rockwool, in an attempt to gain back market share taken by non-combustible competitors, by creating the impression that those products are themselves unsafe or of less reliable safety?

A. No. If it’s not -- it wasn’t aimed at any one particular company, it would have been at the limited and non-combustible product assumption that, because they are labelled so, then the system that they are in is safe.

Q. Right.

Changing my question very slightly, and swapping the word “Rockwool” for “mineral wool”, was this message aimed at shaking the foundations of trust in non-combustible and limited combustibility materials
Q. Can we go to page 6 --
A. -- you get the same result.
Q. I'm so sorry, I interrupted your answer. Do you want to finish your answer?
A. Yes.
Q. Let me go on to the question of the NHBC again and go back to this .
A. I can't recall.
Q. Let me move on to the question of the NHBC again and go back to this .
A. I can't recall.
Q. Now, you say in your first witness statement, please, if we can go to that , at page 16
(KIN00000494/16), paragraph 4.20:
"Between about January 2014 and November 2015, Kingspan was in regular contact with the NHBC regarding the use of K15 in buildings over 18 metres high. I have been directly involved in those discussions only since February 2015 and the details I provide below of the discussions prior to that date are solely based on my review of relevant documentation."
So just pausing there, it's clear, I think, what you're saying here in this statement, your first statement, is that before February 2015 your evidence is simply based on a review of the documents, but you have live recollection from your personal involvement after February 2015.

Q. Did you not see the UKAS accreditation system as adding an extra layer of safeguards, or was it just another lot of red tape?
A. No, it was just, you know, I wasn't 100% sure why only the UKAS one was picked to use, but it wasn't taking away a layer of responsibility, if you like.
Q. Were you not thereby willing to do away with whatever safeguards the extra accreditation UKAS brought?
A. No, because I wasn't aware it did bring any extra safeguards.

Q. That's why I'm asking you. So it was just another lot of red tape, was it?
A. It was just slowing down the process.
Q. What was the purpose of the UKAS accreditation?
A. I don't really know the details for what's the difference between the different accreditation bodies, the difference between a UKAS one and a non-UKAS one for a fire engineer.
Q. Did you or anybody to your knowledge actually think about the benefits that UKAS accreditation brought to the desktop system which removing the UKAS restriction would lose?
A. I can't recall we did.
Q. Was this suggested widening of the scope of those who could draft a desktop assessment something that was discussed with the NHBC in relation to BCATGN18?
A. I can't recall. A. I can't recall.
Q. Let me move on to the question of the NHBC again and go back to this .
A. I can't recall.
Q. Why is the NHBC not mentioned by name in the BCATGN18?
A. I can't recall. A. I can't recall.
Q. Let me move on to the question of the NHBC again and go back to this .
A. I can't recall.
Q. Now, you say in your first witness statement, please, if we can go to that , at page 16
(KIN00000494/16), paragraph 4.20:
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So just pausing there, it's clear, I think, what you're saying here in this statement, your first statement, is that before February 2015 your evidence is simply based on a review of the documents, but you have live recollection from your personal involvement after February 2015.
1 A. Yes, I didn’t recall that meeting.
2 Q. Right. That’s ([Day84/167:3-24]), just for our
3 transcript. I don’t need to show you the transcript;
4 I think you can recall the evidence you gave.
5 A. Yes.
6 Q. Can you explain why you say you weren’t aware of that
7 March meeting given, as you say in your statement, that
8 you were directly involved in the discussions with NHBC
9 from February 2015?
10 A. I think because I didn’t attend that meeting, so
11 I wasn’t directly involved in that meeting.
12 Q. Were you indirectly involved in it, in the sense of
13 discussing preparations for it or discussing what
14 happened at the meeting with those who did attend it?
15 A. No.
16 Q. When you say, “I have been directly involved in these
17 discussions only since February 2015”, that’s not
18 correct, then, is it?
19 A. That may be earlier than --
20 Q. Right.
21 A. -- my first meeting with them.
22 Q. When did you become directly involved in the discussions
23 with NHBC?
24 A. I think later on in the statement I highlight all the
25 meetings that I’ve been present at.

17

1 Q. Right. Being present at the meeting is one thing, but
2 you can also be in email contact with NHBC or talking to
3 them on the telephone.
4 A. Yes, that’s true.
5 Q. So when was it that you first began having direct
6 contact with the NHBC?
7 A. Oh, I can’t recall precisely when the first contacts
8 were.
9 Q. At the time you became involved, did you detect that the
10 relationship between Kingspan and the NHBC was, to some
11 extent, strained, there were difficulties?
12 A. Yeah, yes, my first involvement with it was -- that
13 would be my impression.
14 Q. Were you aware when you did become involved that the
15 NHBC had been seeking fire test data to approve the use
16 of K15 over 18 metres since 2013, some two years or so
17 before?
18 A. Yes, I believe so.
19 Q. Do you remember that NHBC had said that they would stop
20 approving the use of K15 and, in response, Kingspan had
21 threatened an injunction through their solicitors? Do you
22 remember that?
23 A. Yes.
24 Q. And do you remember Fenwick Elliott solicitors being
25 engaged by Kingspan to send a letter threatening
26 litigation on 13 February 2015?
27 A. I’m aware of that letter, yes.
28 Q. Were you involved in the decision to instruct
29 Fenwick Elliott to write that letter?
30 A. I was involved in discussions internally, I think two
31 meetings, I think, or calls I was involved in at the
32 time, but most of the decisions and discussions were
33 taken by others. There were other meetings.
34 Q. Who made the decision, do you recall, to send the letter
35 or to ask Fenwick Elliott to send such a letter? We can
36 look at the letter if you like.
37 A. I think Tony engaged -- Tony Millichap engaged
38 Fenwick Elliott initially, and then there was a team of
39 people involved in the calls regarding the progression
to that letter, is how I’d describe it.
40 Q. When Tony Millichap engaged Fenwick Elliott, did he do
41 so under your instruction or did he do it of his own
42 volition and then tell you about it?
43 A. It wasn’t on my instruction, Tony Millichap --
44 Q. Who did make the ultimate decision to threaten
45 an injunction, can you tell us?
46 A. No, I don’t know who exactly.
47 Q. Can I go to your second statement, please, page 65
48 (KIN00020824/65), and I want to look at
49 paragraph 6.43(c) on that page. You say there:
50 "In 2015, Kingspan worked with the NHBC to agree the
terms of the NHBC Note published in or about March 2015
in support of the BCATGN18 and which, as explained in
paragraph 4.76 above, endorses the BCA Guidance as
setting out acceptable methods for demonstrating
compliance with the Building Regulations as required by
the NHBC standards.”
51 Does that tell us that Kingspan’s work with the NHBC
in March 2015 was against the background of Kingspan’s
solicitors, Fenwick Elliott, threatening the NHBC with
an injunction if they told the market that K15 was
unsuitable for use above 18 metres?
52 A. It’s certainly in around the same time.
53 Q. So NHBC’s discussions -- is this right? -- with Kingspan
in March took place with the threat of legal action
hanging over them?
54 A. I can’t recall exactly when that letter was dated, the
legal injunction.
55 Q. 13 February 2015. For our transcript reference, it’s
(NHB00000941). We can look at it if you like, but --
56 A. No, if that’s the date, then the answer is yes, correct.
57 Q. So I think the answer is yes.
58 To your knowledge, was the NHBC told that the K15
being sold at that time, the first quarter of 2015, was
not in fact the K15 as tested in 2005?
59
A. No, I don’t believe so.

Q. Now, a meeting took place with the NHBC on 18 June 2015 which I think you did attend, didn’t you?

A. Yes.

Q. Just to prompt your recollection, there were a number of things discussed, including a list of about 184 projects for which queries existed on the use of K15.

A. That’s correct.

Q. Do you have a recollection of that meeting?

A. Yes.

Q. Let’s look at the note, {KIN00002499}, please. I am afraid it says July at the top, but we all, I think, confirmed that that was wrong and it should have been June.

The first action there -- well, you can see who was there: you were there, as was Richard Burnley and Ivor Meredith, and five individuals from NHBC, including Steve Evans, Graham Perrior and Dave White.

The first action there in box 1 under “Action” is: “Details of all tests carried out to date as well as timescales/duration and sequencing) to be provided to forward testing programme (wall typologies, 2015) containing details of current enquiries received from (including contact details) and who by NHBC.”

We can see on the right-hand side “Who: Kingspan, Adrian Brazier, Mo Asif Irfan and others, and if you go after the discussions we have just been looking at, that was a reference to 200 or so outstanding queries on the use of K15 over 18 metres?

A. Yes.

Q. “Kingspan (AP/AB). 23 October 2015.” So that’s only ten days hence, isn’t it? So, again, further detail there.

The reference to the “circa 200”, was that a reference to 200 or so outstanding queries on the use of K15 over 18 metres?

A. That was the query list which Kingspan had developed --

1. (AP/IM). That’s you and Mr Meredith, isn’t it?
2. A. Ivor, yes.
3. Q. And “By: 19 June”, which was actually the next day. So it was urgent, wasn’t it?
4. A. Yes.
5. Q. Do you know whether that was done, whether the action point was carried out?
6. A. I think it was. I think Ivor sent the list that they were requesting.
7. Q. Well, I ask you that because do you remember there was a meeting later in the year, on 12 October 2015, that you attended with Adam Brazier(sic)?
8. A. Adrian Brazier?
9. Q. Adrian Brazier.
10. A. Yes.
11. Q. Let’s go to that, {NHB00001199}, please. That’s the note of the meeting. Again, you’re present there with Adrian Brazier, the same individuals there from NHBC, “Meeting 12 October 2015”. Action 1:
12. “Kingspan to compile comprehensive list of all tests including K15 (Passed/Failed/Planned) including details of ownership of results and where the test data can be obtained from (including contact details) and who by (NHBC/BUILDERS/Fire Engineers etc.).”
13. We can see that again “Who” is “Kingspan (AP/AB),” and 23 October 2015 is the “By” date.
14. So it looks as if you were asked for a second time to provide a list of Kingspan test data to the NHBC.
15. Was that new data that you were being asked for, or was it a prompt to provide what was indicated you should have provided earlier in the year, in June?
16. A. I was sure Ivor had sent something, so it may be just to give any new data.
17. Q. Was it discussed at the meeting that whatever they had been sent by Ivor Meredith in June was not satisfactory, and that NHBC needed far more detail?
18. A. I can’t recall that detail, but possibly. But I can’t recall that.
19. Q. Right. And looking at item 2:
20. “Kingspan to provide updated Project Query List containing details of current enquiries received from builders/designers. (circa 200).”
21. A. Yes.
22. Q. “Kingspan (AP/AB). 23 October 2015.” So that’s only ten days hence, isn’t it? So, again, further detail there.
23. The reference to the “circa 200”, was that a reference to 200 or so outstanding queries on the use of K15 over 18 metres?
24. A. That was the query list which Kingspan had developed -- published in August?
25. Q. -- under item 4:
26. A. Project --
27. Q. Did you provide the desktop reports referred to in the routes to compliance document that you had published two months or so before?
28. A. I believe so.
29. Q. Were they subsequently approved by the NHBC, do you remember?
30. A. I don’t recall.
31. Q. You don’t recall?
32. A. No.
33. Q. Can we then go to July 2016, {KIN00002297}, please.
34. A. That’s you and Mr Meredith, isn’t it?
35. Q. -- under item 4:
36. A. Project --
37. Q. Did you provide the desktop reports referred to in the routes to compliance document that you had published two months or so before?
38. A. I believe so.
39. Q. Were they subsequently approved by the NHBC, do you remember?
40. A. I don’t recall.
41. Q. You don’t recall?
42. A. No.
to the top of page 2 (KIN00002297/2), Adam Heath says:

"Yesterday at the NHBC facades conference (at which NHBC, DCLG, BRE and Exova presented) NHBC unveiled a new technical note which will be expanded in the future as more test evidence becomes available. Basically they have taken all the test evidence available in the market featuring combustible insulations (6 Kingspan, 2 Xtratherm, 1 Celotex) to come up with 3 standard wall build ups that they deem automatically compliant. They all have a number of caveats and any deviation from one of these 3 wall types will still require supporting evidence in line with BCA TGN 18.

"The basic wall build up behind the cladding is the same in all instances which is as follows ..."

Then a list is set out. You can see that there.

Now, that news is then sent on, if you look back up the email chain, please, to page 1 (KIN00002297/1), by you to Gwyn Davies, Roy Weghorst, and John Garbutt, the same day, a few hours later. You say:

"Gents

"Interesting development from NHBC, they have effectively eased the passage of compliance for a selection of combustible insulation brands (K15 included) in three select build ups in high rise rainscreen applications.

"Overall, I feel this is good news, as it shows a shift in thinking and an acceptance of combustible insulation and I am sure is a direct result of our testing and campaigning on this issue. However the bad and annoying news is that it also allows Cellotex (sic) and Xtratherm (after relatively little effort) to ride in on our shirt tails and will put significant pressure on us in these select applications."

Now, did you perceive at the time, when you say that you’re sure it’s a "direct result of our testing and campaigning on this issue", that you had had some part to play in the apparent relaxation by the NHBC in their new guidance in July 2016?

A. Yeah, I thought that the evidence that we'd provided them had helped with their thinking, but also, you know, with other work they were doing, we were sure we were involved.

Q. What testing are you referring to there?

A. That would have been our large-scale testing at the time.

Q. Would that have included your July 2014 test?

A. It would, yes.

Q. Which by this time you would have known, of course, was not the same K15 as being used on buildings. You would have known that.
A. I don’t.

Q. Do you know or did you know at the time what the Celotex desktop was?

A. No. Celotex desktop?

Q. Or the test evidence which was submitted by Celotex.

A. No, I think we were aware that Celotex had a test.

Q. Right.

A. I assumed it would be that test.

Q. But you can’t help me further with that?

A. No.

Q. Campaigning you refer to, testing and campaigning on this issue. What campaigning? Was that the campaign --

A. Routes to compliance.

Q. Right. So you saw at least some kind of link, testing, campaigning, between Kingspan’s testing and campaigning in 2015 and the NHBC technical note which emerged in July 2016?

A. Yes, that’s correct.

Q. It’s right, isn’t it, that after the Grenfell Tower fire in June 2017, Kingspan launched a campaign relating to combustible materials used over 18 metres in those three designated wall build-ups?

A. Yes, that’s correct.

Q. I’m going to turn to a slightly different topic, which is lobbying after the fire.

A. Yes, that’s correct.

Q. I think -- is this right? -- that the name of that campaign was the Kingspan political engagement plan?

A. I don’t recognise that --

Q. You don’t?

A. -- phrase.

Q. Let’s look at a document, [KIN00008120]. Now, this is a document called “Kingspan political engagement plan”, and this is the first page of it, with a designed get-up, so this is a created document. Do you recognise it?

A. I certainly don’t recall that cover.

Q. Right. Well, let’s look on into the document. It seems to be drafted by some people called Portland. Do you know who Portland are?

A. Yes, I believe they’re an agency in London.

Q. An agency for doing what?

A. Public relations, public affairs.

Q. Did you engage them or to your knowledge anybody else at Kingspan engage Portland in 2017?

A. Public relations, public affairs.

Q. An agency for doing what?

A. Yes, I recall Kingspan engaging Portland, yes.

Q. Who within Kingspan engaged them?

A. I’m not sure exactly who would have started that process.

Q. Were you involved in their engagement?

A. I certainly went to a couple of meetings with Portland.

Q. Right.

Let’s look on into the document and see if you can help us with it.

Can you go to the second page [KIN00008120/2], please, and look at the overview. The overview says:

“In the first instance, initial outreach should be made by Kingspan and not by Portland. It looks better.

“We must be realistic though: some people will not want to meet you and they will not want to be lobbied. But there is still immeasurable value in getting Kingspan’s manifesto in front of these decision-makers. We want them to read it. We need them to read it. And that’s why it’s vital that our messages are punchy, memorable and easy to understand.

“Following initial contact, there will be a programme of follow-ups and that’s where we hope to use our network of contacts: to nudge, where appropriate. And while we cannot promise you access, we will pull every string to ensure that your messages reach the key people.”
A. Yes. It's only about six or so weeks, so that can pin it down pretty accurately.

Now, can we look at page 3 {KIN00008120/3}, the heading of which is orphaned on to page 2, "Group 1 - Constituency MPs", and here is a list of MPs that Portland are suggesting be lobbied by Kingspan; is that right?

A. That's correct, yes.

Q. Does this look familiar to you? Do you remember this list?

A. No, I don't remember the list.

Q. Looking at the middle of the page, do you remember Kevin Hollinrake MP?

A. Yes.

Q. He is a Conservative member for Thirsk and Malton.

A. Yes.

Q. He has two stars next to his name because he is a member of the DCLG select committee, isn't he?

A. I believe so.

Q. Now, do you remember that these individual MPs were particularly important to Kingspan's campaign?

A. Yes.

Q. Do you remember why they were selected in particular?

A. No, I can't recall.

Q. Can we look at page 4 {KIN00008120/4}, "Group 2 - Key decision-makers", and there is a list of readily familiar names: Sajid Javid, Amber Rudd, Michael Gove and Dame Judith Hackitt, and also Neil Cooper.

Those were key decision-makers in positions of high political influence, weren't they?

A. Yes.

Q. And the idea was to be able to access them as well, wasn't it?

A. It appears so from this document, yes.

Q. Then:

"Meeting requests to Secretaries of State are likely to be referred to the appropriate ministers:

• Alok Sharma MP, Minister of State for Housing and Planning;

• Nick Hurd MP, Minister of State for Policing and the Fire Service;

• George Eustice MP, Minister of State for Agriculture, Fisheries and Food (including 'better regulation')."

"Actions.

• Portland to draft letter requesting a meeting.

• Kingspan to approve and send.

• Portland to provide follow up to secure meetings.

• Portland to provide briefing notes ahead of meetings."

The document goes on in that kind of vein, but it's clear from that that Kingspan had engaged Portland to be able to facilitate as best it could, with no guarantees, access to the very highest levels of power.

A. It -- yes, it doesn't -- I can't see that, very highest levels of power.

Q. Then group 3, bottom of page 4, top of page 5, "Group Chairs and MPs with a key interest."

Over to page 5 (KIN00008120/5), please. Here are some particular MPs with key interests.

Do you know how that group was selected, other than perhaps by reference to their positions?

A. No, just from what Portland's view was, I think.

Q. And we have a number of obvious names here, don't we?

We have Clive Betts; he was the Chair of the DCLG select committee, wasn't he?

Q. Yes.

Q. -- to Siobhan O'Dwyer, John Garbutt, Mark Harris and Tony Ryan of Kingspan. The email is 5 February 2018 and it's very helpful if you could let us know of any feedback, technical mistakes we might have made and if you could provide any proof points to support the argumentation.
One of the key arguments that we need to win with political stakeholders is that combustible materials are no more dangerous that non-combustible materials when improperly installed. We've attempted to provide some lines on this but feel the argument needs to be stronger.

"Regarding the stakeholder list, we've used the Portland one as the basis but added some more MPs, tiered them, and added next steps. The next steps are also tiered by urgency. If you could have a look at the Kingspan actions column and in particular send us any further feedback on the meetings you've already held that would be most appreciated. We will then collate everything together. You will see that there is an officials tab and a 3rd party tab - we’re compiling names to add to these now."

Now, before I ask some questions on this, I just want to show you [KIN00008118], please, which is a spreadsheet, and we need to go to the native of that, please, where we will see a spreadsheet, and the first entry on the spreadsheet, right at the very top, is Clive Betts, Labour Party. Position: Chair, Department for Communities and Local Government. You can see what the spreadsheet does; it identifies the MP, the party, the position, the Kingspan site, emails, follow-up 1, 2, 3 and 4, Grayling action, Kingspan action, priority, notes, it goes on.

Do you recognise that spreadsheet?
A. I don’t.
Q. Have you ever seen it before?
A. I don’t recall it in that fashion, but I know there was information around that.
Q. I mean, of course, this is early 2018 now, so after the fire and after the Portland communications document we’ve seen. Who within your department was responsible for this exercise?
A. From the business -- so the political engagement was mainly driven through John Garbutt and Siobhan O’Dwyer.
Q. Right. And what was your role?
A. I was --
Q. You were, after all, head of technical and marketing.
A. I was there supporting them, yes.
Q. You were there supporting them; did you not see this document at the time?
A. I can’t recall it.
Q. Right.

We can see from this document the efforts that have been made to contact MPs and stakeholders by telephone, email, letter and then follow-ups to get meetings. The impression one gets from this document is that this was a pretty carefully orchestrated campaign --

A. Yes, I agree.
Q. -- across a wide front with a number of extremely powerful and important stakeholders.
A. Yes.
Q. Now, can we then go to your second witness statement.

I want to come back to the precise arguments that you’re actually putting forward, which I think we saw from the Grayling email, the key argument, which is that combustible materials are no more dangerous than non-combustible materials when improperly installed. That’s what’s said, I just want to ask you about that.

If we go to your second statement, page 113 (KIN00020824/113), I’d like to look at paragraph 12.3(e) at the foot of the page there.

Perhaps I should just show you the start of this paragraph. If you go back a page, please, to 112 (KIN00020824/112), in paragraph 12.2, because it’s fair to you to give you the full context, you say this:

"Experience and reflection has lead us to the view that the most effective way of achieving the goal of improving the safety of building occupants in the event of a fire, would be to ensure that all cladding systems are tested as complete systems in their intended configuration to BS 8414 standards so as to meet the requirements set out in BR 135. Experience suggests this delivers better safety outcomes and in our view is best practice rather than simply banning of classes of certain materials."

"12.3. The rationale behind this view is as follows ...
And then you set it out."

Just pausing there, this was your second statement, so it was done in October 2019, wasn’t it, so some two and a bit years --
A. Yes.
Q. -- after the fire?
A. Yes.
Q. You’re not giving evidence as to what happened in the past; you’re explaining Kingspan’s current position. Why was that? Why did you feel it necessary to set out what Kingspan’s view was as at the date you wrote this statement?
A. I think it was just to -- it’s to show that, you know, we believe that testing -- large-scale testing is as important on all systems, rather than just on certain classifications.
Q. Was the idea to promote this message through the Inquiry?
A. I think it was just to provide my view on it.
Q. And the relevance of your view in the context of a witness statement in the Inquiry was what?

A. Just to inform.

Q. I would suggest it goes a bit further than that; it was to promote or push the Kingspan line through the Inquiry.

A. I think it was to show what my thinking was at that time.

Q. Right, okay.

Let’s look and see what you say then at where I wanted to go, next page [KIN00020824/113], please, 12.3(e). You say:

“It is not correct to assume that any combination of 'non-combustible' systems are safe irrespective of how they are assembled in a holistic system. Permitted product combinations can yield unsafe systems: systems comprising so-called 'non-combustible' and 'limited combustibility' insulation and/or cladding systems have failed to meet BR 135 criteria such as …”

Then you set out under subparagraph (i), in big bold, italic capital letters:

“FAILED Test 1 … 27th October 2016 …”

And you set out the identity there.

Over the top of the next page [KIN00020824/114], you can show that the insulation material was Rockwool, "Fujairah Rockwool foil faced mineral fibre /stone wool rated as A1": Then:

“(ii) FAILED Test 2 … Australia … 6th March 2018 … [with an] A2 panel … with Rockwool mineral fibre /stone wool.”

Then:

“(iii) FAILED Test 3 - This test was commissioned by Kingspan and carried out at Exova in Dubai on 2nd July 2018. The system comprised Rockwool DuoSlab (which is rated A1) and VitraCore G2 (which was understood at the time by Kingspan to be rated A2). The construction of the test rig was a replica of the Ministry of Housing, Communities and Local Government tests conducted immediately after the tragedy at Grenfell Tower. The test failed on the basis of thermocouple data which is detailed in the enclosed BR 135 classification report from Exova.”

I’m going to come back to that in a little bit of detail later on.

I don’t know, Mr Pargeter, whether you saw or approved Kingspan’s opening submissions for Module 2; did you?

A. I think I saw them.

Q. You will have seen, therefore, that Kingspan in its opening submissions made specific reference to these three failed tests.

A. Yes.

Q. And indeed another one, Little Venice Towers.

Now, I want to come back to the Dubai tests shortly, but I want to look at some email chains related to Kingspan’s testing in 2018 first.

First is Ulster, March 2018. Can we go to [KIN00004637/3], please. If we go to the bottom of the email chain, page 3, and the first email in time there, we can see that it’s from 2 March 2018 from Mark Harris to you and John Garbutt, among others, and you can see that Tony Ryan is a recipient, and Siobhan O’Dwyer is copied, as is Gilbert McCarthy.

Just tell me, Gilbert McCarthy, what was his role at the time?

A. I think he’s managing director of the -- what we call the panels side of the Kingspan business.

Q. Right.

The subject of the email was “Ulster Tests/MHCLG select committee Lobbying”:

“Hi Adrian, John et al,

“It’s clear that Kevin Hollinrake [he is an MP, as we’ve seen in your list] is still pretty lukewarm about our draft letter /arguments to address MHCLG select committee and MP concerns. The major ‘evidence gap’ is his concern about fire spread with ‘combustibles’ in relation to poor installation - he seems to believe that poor installation is a major problem with ‘combustible’ systems but not with ‘non combustible’. In other words he, and mere hers of the Select Committee, need to see evidence to persuade them that poor installation is an issue with both systems.

“Following discussion with Roy, Tony & Adam I have a simple proposal that could address this issue and give us the evidence we need to demonstrate that non combustible systems are not as ‘fail safe’ as many presume -

1. Gather evidence to demonstrate that fire spread in cavities is potentially dangerous irrespective of cladding type. A good example is the statement in BR 135 …”

And there’s a quotation from BR 135, third edition, 2013:

“2. Further ISO 13785-1 tests at Ulster University to demonstrate similar performance of K15 vs RW …”

Is that Rockwool?

A. I would think so, yes.

Q. Right:

“… when tested without cavity barriers - this
would involve a repeat of the original tests -

a. 100mm K15 with A2 ACM without cavity barriers and flashing at top of rig &
b. Duorock with A2 ACM as above.

"There's little doubt that flames will appear at the top of the rig during the test and the time differential between K15 and Duorock may not be significant.

"I think this evidence will be critically important in persuading Kevin Hollinrake to become an advocate of our view and very useful in lobbying activities elsewhere to demonstrate that -

- So-called 'deemed to satisfy' systems can have rapid fire spread if cavities are not protected (for example as a result of poor installation )
- Fire spread in cavities is similar with mmmf and K15 ...

"mmm" is mineral fibre, isn't it?

A. Yes.

Q. "... i.e. lack of cavity barriers in high performance rigid insulation systems that pass BR135 requirements is not an enhanced risk vs non-combustible - the critical issue is the correct design and installation of all systems."

Now, you have explained RW is Rockwool or could be Rockwool.

A. Yes.

Q. An ISO 13785-1 test is similar, isn't it, to a BS 8414 test, but using a gas fire and on a smaller scale?

A. Yes, it's more of a medium scale than a large scale.

Q. So you understood when you got this email -- is this right? -- that Mark Harris was advocating a comparison between Rockwool on the one hand, or mineral wool on the one hand, and K15 on the other when tested without cavity barriers in order to demonstrate that fire spread can be similar in each case?

A. Yes, I would have understood that.

Q. Indeed, that's why he quotes BR 135, which is that if cavity barriers are absent, then a façade system is going to be unsafe regardless of whatever materials are used.

A. Yes.

Q. Yes.

Now, why was it necessary to demonstrate that in a test rather than simply using experience?

A. I think it would just add weight to the argument of experience.

Q. Right.

Let's go up to page 3 (KIN00004637/3) and go a little higher up the page to the response that you send to Mark Harris on Friday, 2 March 2018, and to others, including Gilbert McCarthy:

"Hi Mark

"OK I see where you are coming from and I would be more than happy to swap our planned tests on A2 to set up as described below, it would be easy enough."

You see that?

Then two days later, if you go up to the bottom of page 1 (KIN00004637/1) and over to page 2, 4 March 2018, John Garbutt responds to you and the same recipients on the email chain, it appears. He says:

"Looking at the videos of the original tests the flames only got as high as the cavity barrier in the A2/FR tests.

"So I think you are going to need to create some 'draw' to get the flames to get above the barrier or rig. So, will we get a greater draw with narrower gaps or wider gaps between panels? Clearly the flashing will have to be absent.

"Would we be better using FR or A2 for this test Roy? Which would give most fuel to get the flames up there?"

Now, first of all, what videos is he referring to, do you know?

A. I don't know, no.

Q. When you received this email, did you ask him so that you could understand it?

A. No, I don't think I did.

Q. Why is that?

A. I'm trying to think what videos ... I may have understood what videos he meant at the time, I just can't recall it now.

Q. Ali right.

Why is he suggesting creating draw on the mineral wool test to ensure flames get to the top of the rig?

A. I think, to do a comparison, you'd have to do exactly the same on both. So one of the factors of how a system would perform is the cavity size, for example, and so if you have a narrow cavity, would that create more of a draw than a wide cavity? But whatever you did for one, you'd have to do for the other in order to get a comparison.

Q. Why is John Garbutt asking the question, "Which would give most fuel to get the flames up there?"

A. I don't know why he's asking that.

Q. Is he setting the rig up to fail?

A. I don't think so, no, because like I say, you'd have to do it for both. So if it was more challenging for one, it would be equally more challenging for the other.

Q. What would be the point of his question, "Which would give the most fuel to get the flames up there?"
1. A. Either an FR or an A2 ACM?
2. Q. Well, you tell me.
3. A. That’s what I think he’s saying there, which of the FR
grade or A2 to use for this.
4. Q. Yes. Why would you want to get the flames up there?
5. A. I think to try and create a worst-case scenario for the
comparison testing.
6. Q. Well, a worst-case scenario would be not to use
cavity barriers, wouldn’t it?
7. A. As well as the other factors, so the cladding element,
the cavity size, no cavity barriers, they all have
an influence.
8. Q. Right. Okay. So the idea was to create a worst-case
scenario; is that right?
9. A. TRYING TO PIECE TOGETHER FROM THIS INFORMATION,
I think --
10. Q. Well, let’s see how we go with that.
11. We can look at the response from Mark Harris if you
go to page 1, just a little bit above it, 5 March, to
you and others:
12. “Hi John,
13. “I think we definitely have to use the A2 ACM –
an important message of this test could be that you can
get excessive fire spread in cavities in rain screens
that are compliant with the linear route. Thereby
demonstrating the importance of installing cavity
barriers & testing the full system to demonstrate they
work in the actual rain screen build up. In addition it
demonstrates that getting the installation right is just
as important with so called non-combustible/limited
combustible systems as it is with ‘combustible’ systems
that pass BS 8414.”
14. So does that tell us that the point of the testing
was to demonstrate that K15 was no more risky than
mineral wool?
15. A. I think to compare them in a -- the same system to show
how they’d perform, and if they perform the same way
then it could be assessed as at the same risk, if you
like, same performance.
16. Q. Yes. My question is: was the purpose of that to
demonstrate that K15 was no more risky, fire risky, than
mineral wool?
17. A. Yeah, I think it was to show a similar performance, yes.
In a system, that is.
18. Q. And in doing that, you were proposing a system build-up
that would fail even with mineral wool.
19. A. Yes.
20. Q. Let’s look at another email chain a little bit later in
the year, the next month, [KIN00004658]. This is
a chain which is entitled “Linear Route Action Plan”.
21. A. Not specifically what that might have been at that time.
22. Q. Well, you tell me?
23. A. Either an FR or an A2 ACM?
24. Q. Well, let’s see how we go with that.
25. We can look at the response from Mark Harris if you
go to page 1, just a little bit above it, 5 March, to
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46. Q. And in doing that, you were proposing a system build-up
that would fail even with mineral wool.
47. A. Yes.
48. Q. Let’s look at another email chain a little bit later in
the year, the next month, [KIN00004658]. This is
a chain which is entitled “Linear Route Action Plan”.
49. A. Not specifically what that might have been at that time.
50. Q. Why did you need evidence for use in the political
arena and with the Hackitt Review team?
51. A. I think because there was an assumption that just
classifying products on their own performance and then
allowing them on a linear route wasn’t always going to
be potentially safe, when you compare it to, say, an 8414 test, for example, on a system.
52. Q. Did you realise by this point -- this is April 2018 --
that the insulation used at Grenfell Tower was RS5000,
namely a PIR product?
53. A. Oh, PIR, yes, we knew it was PIR, sorry.
54. Q. And that therefore wasn’t a product of limited
combustibility or a non-combustible product, was it?
55. A. That’s correct.
56. Q. So materials of limited combustibility or
non-combustible materials hadn’t actually caused any
problem at Grenfell Tower.
57. A. No, that’s correct.
58. Q. So what was the point of attacking their use?
59. A. Because if you assume just by their individual
performance that when they’re put into a system it is
safe without testing that system, that assumption could
be flawed.
60. Q. But that position was one that Kingspan was driving.
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Discussion during the meeting identified the following

- The testing of materials 'deemed to satisfy' BR 135,
- A slot on 10th May available for a test on a system comprised of materials 'deemed to satisfy' BR 135.
- A. No, that's correct.
- Q. So what was the point of mounting a campaign to attack the use of non-combustible materials or materials of limited combustibility?
- A. It's not to attack the use of them; it's to question the logic around only using them based on their individual performances rather than how they perform in a system.
- Q. That question was one that originated with Kingspan, wasn't it?
- A. That question, about how they perform in a system?
- Q. Yes.
- A. What I've just -- yes.
- Q. Yes. It wasn't a problem in the market or the industry, it wasn't a problem that had been come across by the tests of the DCLG, or MHCLG as it was; it was a problem that had originated with the marketing campaign which we saw in the Portland document, and in the Thomas Anelay document --

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Q. Did you not, if that was the plan, detect a degree of irony in the approach, given that for more than a decade, as you well knew by this point, Kingspan K15 had actually been sold without an applicable 8414 test?

A. Yeah, I’d agree there’s an element of irony, but it’s the whole system. I mean, systems generally were being put onto buildings without any testing, whether there was, you know, our product or other products in the market, that was happening.

Q. Yes.

A. So, you know, to stop that happening and to stop issues like we saw on Grenfell is if you had an 8414 test for that system, regardless of the materials that comprised it, and it passed, you’d have a measure of safety built in.

Q. Yes.

A. Looking at the last paragraph of this email on page 6 [KIN00004658/6] he says: “I thought we had an extremely useful session this morning with actions that could deliver some very valuable evidence to support the need for full scale testing of all systems and demonstrate that materials that are ‘deemed to satisfy’ the linear route do not automatically meet BR135 criteria when tested full scale to BS 8414.”

Q. And you were going to exploit the commercial opportunity by sowing doubt, planting the seed of doubt about, as we’ve seen, the use of non-combustible and limited combustibility materials by directing attention to 8414 and how those materials, even if they are non-combustible, can perform badly in a full system test?

A. Yes.

Q. Then under letter e:

“NJ to create drawing of A2 cassette assembly that could perform poorly.” Why was Mark Harris designing a test with weak structural specifications and an A2 cassette assembly that could perform poorly?

A. I would say there’s different methods of manufacturing cassettes, and I would have guessed from that you’ve got a range which some may perform better than others structurally, and so it’s possible that, you know, that construction or a weaker structural product would be used within a project. So if you make it to that, then you’re creating that sort of worst-case scenario.

Q. You say you’re setting up a worst-case scenario; it looks as though Kingspan was planning to set a mineral wool test up to fail.

A. No, it was to set it up to a potential scenario that could be realistically built on a building.

Q. I’m not sure I understand this. A to e are particular details of a bigger idea which is introduced in the sentence which precedes it, which is namely a configuration that has the potential to fail BR 135 criteria. Why design a test that has the potential to fail?

A. Because that could be a system that could get through the linear route onto a building.

Q. But the idea surely would be to do the best you could to show the most robust system and then compare the two, compare K15 and mineral wool, not the worst!

A. Well, no, a most robust system, you would assume, or the most robust you could build, you would assume would pass a BR 135.
SIR MARTIN MOORE-BICK: Thank you very much.

THE WITNESS: Of course not.

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

MR MILLETT: Yes, Mr Millett.

A. Yes.

MR MILLETT: Mr Chairman, I'm part-way through this email, but I'm not going to finish it before a natural break.

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

MR MILLETT: Yes.

SIR MARTIN MOORE-BICK: You see that?

A. Yes.

SIR MARTIN MOORE-BICK: Mr Chairman, I'm part-way through this email, but I'm not going to finish it before a natural break.

A. Where does it say worst-case scenario?

Q. Well, standard and weak variants.

A. That's probably sensible.

SIR MARTIN MOORE-BICK: Thank you.

MR MILLETT: That's probably sensible.

SIR MARTIN MOORE-BICK: Thank you.

A. Oh, that's that weak variant point. Yes, but within obviously the realms of the manufacturing process.

MR MILLETT: Yes.

Q. Looking at the last point, number 4, that relates to poor installation, and it says:

"We discussed the potential to demonstrate that poor installation can cause failure in BS 8414. It was generally felt that this was a dangerous route to go down for a variety of valid reasons. We must always promote best practice installation. Information from the above tests in Dubai and Ulster would mitigate the need for data on poor installation."

A. I think what he's saying there is if it's designed and installed correctly, then you don't need to discuss poor -- it's not relevant then on poor installation. It's very difficult to design a system around a potential poor installation scenario. So it's best -- it mitigates any need for collecting data on a poor installation, because you haven't built a poor installation.

Q. So you could eliminate poor installation as one of the variables?

A. Yes.

A. I think what he's saying there is if it's designed and installed correctly, then you don't need to discuss poor -- it's not relevant then on poor installation.

A. I think what he's saying there is if it's designed and installed correctly, then you don't need to discuss poor -- it's not relevant then on poor installation.

SIR MARTIN MOORE-BICK: All right.

SIR MARTIN MOORE-BICK: All right.

A. Yes.

SIR MARTIN MOORE-BICK: All right.
Q. Now, going up the email chain, the next day, 10 April 2018, if we can go up to the bottom of page 3 (KIN00004658/3), which is where the email starts, Nick Jenkins sends an email to Mark Harris, John Garbutt, you, Phil Cook and others, including Gene Murtagh and Gilbert McCarthy. Do you see?

A. Yes.

Q. He says:

"OK this represents a real challenge however we have made some good progress today."

Then if you look a bit lower down, under "BS 8414 Test Proposal (Dubai)", he is talking there about a 10 May slot for that test, and he says:

"To utilise the test slot booked by KIL on 10th May available for a test on a system comprised of materials ‘deemed to satisfy’ BR 135. AP has advised we need to get the full set of panels and components to Pembridge to be packaged for air freight to Dubai by the end of the day Friday 13th April this week. This represents a challenge but is not impossible."

Then he makes a list:

- a. Drawings preparation started today …
- b. We have some Alucobond A2 in stock from which we can fabricate the panels.
- c. AP has confirmed they have 180mm RW in stock in Pembridge to service this test."
- d. “Siderise have recommended we use the Envirograph cavity barrier products. These meet regs requirements but their performance is expected to be poor. We will not utilise panel inserts but attempt to cut the cavity barriers to suit the geometry of the panels this will further weaken their performance."
- e. “The panel system as drawn is expected to perform badly in spite of being A2 as it relies on bonded stiffeners and extrusions for its structural stability. The panel is not fixed on its vertical edges and the bonded connection are expected to deteriorate and fail quickly in the BS8414 test. The way the internal corner is detailed will allow the flames to bypass the vertical cavity barriers and attack the cavity of the wing wall."
- f. “The vertical joint is ventilated and the fire will enter the assembly through this baffled joint."
- g. “The horizontal joint is ventilated and the fire will enter the assembly through this baffled joint.” 

It looks from those parts of this description of what was proposed that this was a deliberately planned test so that it would fail, deliberately set up to fail?

A. I think -- again, I think that is the weakest option of a compliant system. So it would still be compliant with that -- I’m not sure whether that would be a typical build-up, but certainly a potential build-up. So I think, again, it was designed around building something which could be used on a building potentially.

Q. But you’re not setting up, are you, a worst-case scenario kind of or, as you put it, weakest option of a compliant system in order neutrally to see what happens; you’re setting it up deliberately so that it will fail, the performance will be weaker. That’s what’s happening here, isn’t it?

A. But that system would still be within regulations and guidance. So if that system then fails, it proves the point.

Q. Why not just set up a best-case scenario in order to do the comparison?

A. Because a best-case scenario, regardless of the materials that you do -- you use is very likely to pass. As we’ve got many passes with our product built to those conditions, I’m sure with, you know, a non-combustible insulation, that would also pass.

Q. All right. Try one without a PE core.

A. Well, this -- but then a PE core -- not a PE core is not replicating that, and just use mineral fibre, in other words a system that was being used in the market?

A. Because if you’ve got a PE-cored ACM on, for example, that was already proved that that would fail by the Government testing.

Q. If you can give us a system that was already proved that this was a deliberately planned test so that it would fail, deliberately set up to fail?

A. So this was built -- so there’s a system on the building, that’s the system I’m talking about, that system would comply with the linear route to compliance --

Q. Well --

A. -- which if you then subject to an 8414 test and it fails, proves the point we’re trying to make.
Q. How else can you explain what Mr Jenkins says in e, for example -- and it is only an example of what he is saying -- where the panel is not fixed on its vertical edges and the bonded connections are expected to deteriorate and fail quickly? Why did you set out to have the panels deteriorate and fail quickly?
A. Like I say, that’s a potential design that could get used on a building.
Q. The email continues: “Assuming sign off of drawings tomorrow we will …” And then he sets out a set of proposed milestones, and then he says: “Also looking to source some Vitracore G2 via a contact in Dubai. This would be another deemed to satisfy product that we feel [would] perform poorly as part of a system …” “Everything is going to have to go like clockwork for all this to work but is all possible.” I will come back to Vitracore G2 shortly. Your response to all of this is the next email above it on 11 April 2018 {KIN00004658/3}, and you say there:
A. Yes, it wasn’t -- it was not designed to be the most robust system you could build under the linear route; it was designed with all these weak features so it had the best chance of performing poorly.

Q. So do I take it that you’re setting up a test -- is this proposal in some distant part of the business; this request went right to the very top of the Kingspan organisation, didn’t it?
A. These emails are copied in to Gene and Gilbert, so …
Q. We haven’t seen -- and we’ve seen a lot of material in the last two and a half weeks from Kingspan -- I think I’m right in saying, any emails at all with Gilbert McCarthy or Gene Murtagh on them. Does that tell us that, of all the things to do with K15, this was of particular importance to Kingspan as a global entity?
A. Yes, it would be.
Q. Now, on page 2 {KIN00004658/2}, if we go up, we can see Nick Jenkins’ response on the same day, 15.50, to you, again copied to the same copy or recipient parties:
“1 appreciate that Adrian. Thanks. "Roy, any news on the availability of the Efectis facility next week? The ball is rolling for production of 5 panel sets as per the drawings I sent last night. "Regarding the Dubai tests please find attached the drawings for review and sign off. The assembly is currently detailed with a blockwork wall, it will in fact be an SFS wall. I have introduced as many weak features/details as possible to ensure it has the best chance of performing poorly whilst at the same time retaining the panel modules and cavity barrier arrangement associated with all tests to date. If you have any comments these will be needed by return as material will be CNC cut and fabricated into panels tomorrow.”
Now, Mr Pargeter, that, I have to suggest to you, speaks entirely for itself, doesn’t it? The plan here was to ensure that the design had as many weak features or details as possible to ensure that it had the best chance of performing poorly?
A. That’s right, and, again, within the linear route. So, again, it’s possible to have a system built with those weak points in it onto a building. So the idea is obviously to test that and prove that it can fail.
Q. So do I take it that you’re setting up a test -- is this right, is this your evidence? -- to be done which would be deliberately designed to fail?
A. No, it’s deliberately got features in which could be built on a building which could impact its fire performance.
Q. I’m not sure I see the difference. I have suggested to you that it was designed with all these weak features so that it would have the best chance of performing poorly, in other words designed to fail.
A. Yes, it wasn’t -- it was not designed to be the most robust system you could build under the linear route; it
was designed to be at the other end of that linear route, which...

Q. It was not designed to be the best, but nor, equally, was it designed to be neutral, in other words fairly representative; it was deliberately designed to fail.

A. It was to perform -- it was to be the most challenging system design under the 8414 test.

Q. Well, there are challenging tests and there are tests which are designed to fail.

A. No, if it was designed to fail then we could have taken out the fire barriers, we could have done a lot more.

This was designed to perform poorly, but we wouldn’t know if it would fail until you tested it.

Q. I accept that, but I'm looking at motive, intention.

The intention of Kingspan, right to the very top of the organisation, was to set up a test in Dubai that was designed to fail.

A. It was designed to perform poorly.

Q. What's the difference?

A. Well, you could guarantee a failure by doing a lot of other things, but those other things probably wouldn’t be typical options within a build-up. So these are typical options within a build-up, to challenge that system under the test.

Q. If we change the words "performing poorly" to "fail", to ensure that it has the best chance of failure, that would come to the same thing, wouldn’t it?

A. No, it didn’t necessarily. It was just to perform poorly. We could guarantee a failure, but that wasn’t the intention; the intention was to look at the options that were available under the linear route, what system could you build, this is a potential system, it isn’t the strongest design, it is designed to challenge the system under the test, and if that fails then you’ve proved your point, or if it performs poorly.

Q. Were you going to compare this system with the best chance of performing poorly with an equal and opposite K15 test which also had the best chance of performing poorly?

A. No, because K15 or any other combustible insulation can’t be allowed via the linear route.

Q. But this is an 8414 test you’re setting up, isn’t it?

A. Yes.

Q. So were you going to do a K15 8414 test which also had the equal best chance of performing poorly so that those reading the two tests side by side could make a proper comparison?

A. No, we weren’t questioning -- what we were doing with this test was questioning the linear route, and K15...
A. I can't recall.
Q. Did you have any input into drafting it?
A. I can't recall.
Q. Did you see it at the time?
A. I think so.

First of all, I should ask you: have you seen this one or two paragraphs in it, four days after the Dubai test. I just want to show you the Housing, Communities and Local Government select committee, and it's dated 6 July 2018, so the Housing, Communities and Local Government written by Richard Burnley to Clive Betts MP as Chair of the Housing, Communities and Local Government Select Committee, and if you have any further questions then.

Q. Let's move on.
A. No, it's trying to address an equitable level of safety. It's report number SR0894, "Vitracore G2 Composite Panel with 180mm Rockwool Duo Slab Insulation", and if we look down to the next page (KIN00000480/2), we can see, just working through it -- and this is an Exova test -- the test sample description with Siderise cavity barriers there, and then over the right-hand side.

Q. Yes, just to be clear, we've got the test or the classification report at (KIN00000480). Let's have a look at that, please. It's report number SR0894, "Vitracore G2 Composite Panel with 180mm Rockwool Duo Slab Insulation", and if we look down to the next page (KIN00000480/2), we can see, just working through it -- and this is an Exova test -- the test sample description with Siderise cavity barriers there, and then over the right-hand side.

Q. And I think it went ahead in fact in July 2018, 2 July.
A. Yes.

Q. “Dear Mr Betts.

“Thank you for inviting Kingspan Group to give evidence to the Housing, Communities and Local Government Select Committee regarding your inquiry into Dame Judith Hackitt’s Independent Review of Building Regulations and Fire Safety.

“First, I wanted to take this opportunity to reiterate that as the world’s leading manufacturer of insulated construction products containing both combustible and non-combustible insulation our first priority is safety. We are deeply saddened by the terrible tragedy of Grenfell and take our responsibilities as a manufacturer very seriously. We believe that Kingspan has carried out more product and full system fire safety tests than any other construction material company and are committed to doing whatever is necessary to address the issues of transparency, labelling, traceability and technical/installation support identified by Dame Judith Hackitt.

“I also wanted to repeat that the applications and products caught by a ban on combustible materials as proposed by the Government’s consultation on ‘Banning the use of combustible materials in the external walls of high-rise residential buildings’ would represent significantly less than 1% of Kingspan’s Group turnover. Our position is not about commercial benefit but about ensuring that building regulations are always rooted in science and engineering.”

Then the next paragraph talks about the evidence given by those at the committee, and some individuals are identified there.

Then it says this:

“Regarding BS 8414 we would also like to take this opportunity to agree with the comments of Sir Ken Knight and Mark Hardingham, notably that the test is set at a very high-bar, that its credibility is not as doubtful as some have suggested, and that of the 300 buildings that have the wrong cladding none have undertaken or passed the test. We also support the view of the entire second panel that there is an important place for desktop studies in the building regulations, provided they are reformed, rooted in primary test evidence and carried out by qualified assessors.

“I have set out Kingspan’s position in more detail below and enclose copies of Tenos International Fire Engineering Consultants’ BS 8414 Review and details of the failed A1/A2 tests which I referred to in my evidence. I hope this information proves useful to the Committee and if you have any further questions then
“Kingspan has evidence of three failed large scale fire tests where the cladding system was made up of A1 and A2 products. The tests are detailed below and supporting documentation is enclosed.”

“Despite failing this BS 8414 test, the products used in this system are A1 and A2 and would therefore be automatically permitted under current Building Regulations and the Government’s proposals on banning the use of combustible cladding. This evidence supports Kingspan’s view that cladding systems should be subject to large scale tests (as complete systems in their intended configuration) in order to meet the objective of fire safety.”

We don’t see anywhere in this letter, or indeed in any of the underlying material, where Mr Burnley or anybody else at Kingspan tells the select committee that the test was designed to perform poorly, do we?

Q. Right. You were head of technical --
A. I think I was involved.
Q. -- and marketing.
A. Yes.
Q. Who else, or who would have been?
A. I think Richard Burnley, obviously, and the team at Kingspan, so that would be John Garbutt.
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MR MILLETT: No, I think it wasn't a deliberate attempt at all to --

Q. Come on, Mr Pargeter, this was a deliberate attempt to deceive Mr Betts and the select committee, wasn’t it?

A. No, it wasn’t a deliberate attempt at all to --

Q. There is no other way of explaining it, is there?

A. No, it wasn’t a deliberate attempt at all to --

Q. That’s not correct.

A. No, they wouldn’t have been misled. It was a system designed which would comply with the linear route. So that’s not misleading anybody, that’s what it was.

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A. No, it wasn’t a deliberate attempt at all to --

Q. And anybody reading this letter would have been misled deliberately by Kingspan into thinking that this test was deliberately designed to perform poorly? Why not say that?

A. It was a system designed along -- potentially along the linear route. That’s all it was.

Q. And anybody reading this letter would be misled, wouldn’t they, into thinking that the test had not been set up to fail but was a fairly representative test?

A. No, they wouldn’t have been misled. It was a system designed which would comply with the linear route. So that’s not misleading anybody, that’s what it was.

Q. Do you accept this much: that Kingspan deliberately and known by Kingspan not to be true?

A. No, I think -- I don’t think it was an accident. There was no deliberate attempt to mislead, it just was

A. Correct, as a system.

Q. And therefore anybody reading this letter would be misled, wouldn’t they, into thinking that the test had not been set up to fail but was a fairly representative test?

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Q. Now, there is a response to this letter, [Kin00002540]. It’s a letter which comes at the end of the month,

Q. There is no other way of explaining it, is there?

A. No, it wasn’t a deliberate attempt at all to --

Q. That’s not correct.

A. No.

Q. You don’t accept that it was deliberate?

A. Deliberate --

Q. You thought it was an accident, did you?

(Pause)

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Q. Now, there is a response to this letter, [Kin00002540]. It’s a letter which comes at the end of the month,
To your knowledge, did Mr Murtagh or anybody else poorly.

setting the test up to fail or setting it up to perform

Q. And Gene Murtagh, the CEO, who was in on the April

A. No, it 's not, it 's to challenge the level of safety , and

Q. Well, he says, "This would be another deemed to satisfy product that we feel [would] perform poorly as part of a system." Is this the Vitracore G2 that was subsequently sourced for the test that took place on 2 July?

A. I believe so.

Q. Did Kingspan realise that Vitracore G2 was a highly unreliable product?

A. Unreliable in what sense?

Q. We 're looking at the Dubai test again at the bottom of page 3 there and the panels.

If we go to page 4 {KIN00004658/4}, we can see that he says at the bottom of the email in the middle of the page:

"Also looking to source some Vitracore G2 via a contact in Dubai. This would be another deemed to satisfy product that we feel [would] perform poorly as part of a system." Is this the Vitracore G2 that was subsequently sourced for the test that took place on 2 July?

A. I believe so.

Q. Did Kingspan realise that Vitracore G2 was a highly unreliable product?

A. Unreliable in what sense?

Q. Well, he says, "This would be another deemed to satisfy product that we feel [would] perform poorly as part of a system." So that particular component Mr Jenkins thought was one of those, on top of the others, that would assist the test to fail; yes?

A. That’s not the position at all, no.

Q. And that had been your own approach and Kingspan’s general approach for years.

A. I disagree.

Q. And it’s still going on.

A. No, I disagree.

Q. I just want to ask you a little bit more about this test and the G2, as we’ve seen that that was one of the ingredients .

Can we go back to April 2018 and [KIN00004658], please. This is the email of 10 April. If we go down to page 3 {KIN00004658/3} -- we looked at it before,
A. Possibly, yeah. I can’t recall it specifically, but—
Q. I can show you a document: [KIN00000545]. This is a letter from James Brokenshire MP, who was the Minister, “Vitracore G2 cladding”, and it’s addressed to Clive Betts:

“Dear Clive,

The Government has today concluded fire safety tests of the Vitracore G2 cladding product.”

Then in the third paragraph:

“We have taken immediate action and referred this matter to Trading Standards and asked the supplier to withdraw the product from the market until it can demonstrate it meets the required standard. We have also contacted the two high rise, residential buildings owners that have purchased Vitracore G2 for use on their buildings to inform them of our finding.

“This product is not widely used in the UK but we have asked the Government’s Independent Expert Panel what additional action, if any, may be necessary.”

So the test that Kingspan did, including Vitracore G2 as one of those items that was expected to assist the test to perform poorly, was not one of those widely used in the UK. That’s right, isn’t it, looking at this?

A. Yes, I think so.

Q. And that would assist the test being unrepresentative, wouldn’t it?

A. Yes.

(Pause)

Q. Sorry, can I have the question again, sorry?

A. Yes. That would be an additional factor -- let me put it a different way -- or component in the test that would assist it to fail?

Q. The fact that it wasn’t widely used in the UK?

A. The fact that it wasn’t widely used in the UK?

Q. No, you’re quite right, you have muddled me and I have muddled you. Let me try again.

The fact that Vitracore G2 was not widely used in the UK would be a reason, among others, why the system tested in Dubai was not a test of a system representative of systems used in the UK?

A. I don’t think so necessarily, but I accept the fact that Vitracore G2 isn’t a common product in the UK.

Q. Now, we’ve seen Kingspan’s plan, which was to demonstrate by empirical evidence, so it was to appear, that the deemed to satisfy system had failed a large-scale fire test.

Can we go to [KIN00000530], please. This is an email of 5 July 2018, just the third email down on page 1 there, from John Garbutt, Kingspan’s divisional marketing director, to Brian Martin.

Note the date. It’s three days after the Dubai test, but the day before Mr Burnley wrote his letter to Clive Betts enclosing the 94-page analysis and the Dubai test result.

He says this:

“Hi Brian.”

And just to be clear, Brian Martin was not only the author of the 2003 BR 135, but in 2018 was head of technical policy, wasn’t he, in the Building Regulation and Energy Performance Division of the MHCLG? That’s right, isn’t it?

Q. A. I believe so, yes.

Q. Yes:

“Hi Brian.”

Pausing there, I should ask you: was he familiar to the marketing team at Pembridge?

A. No, I wouldn’t say he was familiar to the marketing team in general, but I certainly was aware of Brian Martin.

Q. Had you met him?

A. Yes.

Q. In what context?

A. I think I’d met him at -- there was -- I think it was called a BEA(?), something like that, which was looking at the definitions in ADB. I was part of a group there for a short while. I think I’d met him at the Government fire testing.

Q. When was the first time you met Brian Martin?

A. Probably at the BEZA(?), I think it was called, group.

Q. When was that?

A. 2015.

Q. Right.

A. Around that time.

Q. Okay. Did other people at Kingspan meet him with you?

A. The BEA meetings were just me -- well, just me from Kingspan. I think we’ve met him with -- I think I’ve met him with John Garbutt once as well.

Q. Right. How often were the meetings with Brian Martin?

A. Not very often. Quite rare.

Q. What sort of things did you discuss with Brian Martin at those meetings that you had with him?

A. Erm ... so the BEA meetings were around the definitions and the update of ADB, and our meetings would have been around our products and where Kingspan was moving forward with ...
A. Yes, sometimes, yes.

Q. In John Garbutt’s email he says this:

“A. I can’t say, I just think John was trying to just update Brian Martin with what we’d found.”

Q. Did you discuss with Mr Garbutt opening, as it were, a second front and sending the test results to Mr Martin?

A. Not that I can recall.

Q. Right.

We can see Brian Martin’s further email of 12 July 2018 a little bit higher up the page, and he says:

“Hi John another question - a slightly odd request perhaps.

Do you have any of the Honeycomb material you tested left over? As you might imagine we need to do some work to understand the burning behaviour of this material and our first task is to get hold of some!”

John Garbutt’s response was:

“We do. But it might cost a meeting with a minister. [Smiley face] John G.”

Can you assist us with whether there was in fact a meeting with a minister facilitated by Mr Martin or anybody else?

A. Not that I can recall.

---

Q. The impression one gets from this email run is that Kingspan is, to use a colloquialism, perhaps, cosying up to a senior civil servant in the MHCLG with a view to using him as a stepping stone to access to power at the very highest level. Would that be an unfair reading of this email?

A. Yeah, I think it would be an overstatement of that.

Q. What was going on, then?

A. I think John was just being a bit sarcastic there, hence the smiley face. I don’t think he realistically meant we would only supply him that if we got a meeting with a minister. That was just a --

Q. Yes, one can see that it was clearly a light-hearted comment because of the winking smiley face, we understand that.

A. Correct.

Q. But in fact it is right, isn’t it, as we’ve seen, that access to the very highest levels of power, including very senior ministers, was something Kingspan had been planning with Portland, and indeed others, for many months as part of its political engagement campaign, hadn’t it?

A. Yes, it was definitely --

Q. Therefore, it wouldn’t have been surprising, would it,

---

Q. Was it a pincer movement, using a second channel you had?

A. I just think, like I say, just to update him on what we’d found.
MR MILLETT: Yes.

SIR MARTIN MOORE-BICK: Unless you have reason to think that longer might be needed.

MR MILLETT: I don't, I think, at the moment. It depends what's in my inbox, but we will check. If we say ten minutes, and then come back to you if we need more time, that would be helpful.

SIR MARTIN MOORE-BICK: Yes.

MR PARGETER, when counsel gets to the end of his questions, as he says he has, we always have a short break so that he can check that nothing has been overlooked, but also to enable others who are following the proceedings from elsewhere to suggest further questions that might be asked.

So we will stop now until 12.50. It may be that we shall take a little longer if that's required, but we will say 12.50 for the time being, and then we'll see if there are any further questions at that point that we need to ask you.

THE WITNESS: Okay, thank you.

SIR MARTIN MOORE-BICK: All right? Thank you very much.

Would you like to go with the usher, please.

(12.50 pm)

MR MILLETT, you can let us know if you think that a bit more time is required, if there is a good reason.

MR MILLETT: Yes, thank you very much.

---

Q. Has anybody at Kingspan been disciplined for presenting a misleading picture to Clive Betts and the select committee?

A. It might have been John. I can't recall a specific -- at this very moment, a specific meeting with a minister.

Q. Has anybody at Kingspan been disciplined for presenting a misleading picture to Clive Betts and the select committee?

A. I can't recall. I'm trying to second-think at the moment.

Q. I can't recall. I'm trying to second-think at the moment.

A. Yeah, I was just trying to think ... I can't recall. I think we might have -- no, I can't recall at the moment.

A. No, I don't. I think they would have been -- MHCLG would be on the list of people to contact.

Q. Did you get a meeting with a minister?

A. I can't recall. I think we might have -- no, I can't recall. I'm trying to second-think at the moment.

Q. You would remember if you met a minister?

A. No, I don't.

Q. So you would recall whether you did.

(Pause)

A. I think we did get a meeting with a minister.

Q. Who was that?

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A. I think we did get a meeting with a minister.

Q. Who was that?
Q. Do you know whether those were submitted as case studies themselves to NHBC?

A. I don’t think they would -- case studies would have been submitted.

Q. The desktops?

A. The desktops -- desktop assessments for any projects, they may have been.

Q. Right, thank you.

Now, you referred to your diaries on Outlook. We have got those from you, but I’m afraid we can’t search them for any evidence of your meeting with an MP without a date.

Can you give us even roughly a date range when you think you might have met a minister?

A. Yeah, as I say, I can’t recall exactly whether I met a minister or not, but there were definitely meetings with MPs, and there was particularly a dinner I remember at the Houses of Parliament which I attended, and there may have been a minister at that, and that’s why I was kind of struggling to recall whether there was a minister there or not.

Q. That is clearly a matter of record, and we have that.

A. Correct, yes.

Q. There were ministers there, but I am really asking you to say to the families?

A. I don’t think I can’t recall exactly whether I met a minister or not, but there were definitely meetings with MPs, and there was particularly a dinner I remember at the Houses of Parliament which I attended, and there may have been a minister at that, and that’s why I was kind of struggling to recall whether there was a minister there or not.

Q. That’s the Kevin Hollinrake dinner in January 2018.

A. Correct, yes.

Q. There were ministers there, but I am really asking you to say to the families?

A. Well, I should thank you on behalf of the panel for coming and for assisting us with our investigations. So thank you.

SIR MARTIN MOORE-BICK: Mr Pargeter, it’s right that I should thank you on behalf of the panel for coming here to give your evidence. I know it’s taken rather longer than perhaps you or we thought it might, but there were a lot of questions to ask you and it’s been very helpful to have your evidence.

SIR MARTIN MOORE-BICK: Thank you very much for coming, and now of course you’re free to go.

Now, you referred to your diaries on Outlook. We have got those from you, but I’m afraid we can’t search them for any evidence of your meeting with an MP without a date.

Can you give us even roughly a date range when you think you might have met a minister?

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Q. That is clearly a matter of record, and we have that.

A. Correct, yes.

Q. There were ministers there, but I am really asking you to say to the families?

A. Well, to the families, you know, deepest sympathies.

Q. Right, okay. Thank you very much.

A. Thank you very much.

Looking back on all the evidence that we’ve seen in the last two and a half days, and casting your mind back over everything that’s happened, both before and after Grenfell, is there anything that you, in your heart, would have done differently, or anything you’d like to say to the families?

A. Well, to the families, you know, deepest sympathies.

Q. Right, okay. Thank you very much.

A. I didn’t think that a fire like that could happen in the UK.

And in terms of what I would do differently, I would probably look back in history a bit more than I did when I first took over. If I was taking over another role in a similar way, I might be tempted to go back further in time to check things out.

And I think, from my own perspective, and I think from the company’s as well, we’ve definitely learnt some lessons, and we’re trying to make improvements on our processes and procedures to try and ensure that we improve the way we control bringing new products to market and in the marketing of those products, and keep that under constant review.

SIR MARTIN MOORE-BICK: Well, Mr Pargeter, thank you very much for your evidence. I thank you very much for coming to the Inquiry and for assisting us with our investigations. So thank you.

SIR MARTIN MOORE-BICK: Right. Well, that’s a convenient point as far as this morning is concerned.

MR MILLETT: Yes, Mr Chairman.

SIR MARTIN MOORE-BICK: We have another witness after lunch, is that right?

MR MILLETT: Yes, at a time convenient to you, Mr Chairman, and that will be Richard Burnley.

SIR MARTIN MOORE-BICK: Well, unless you need more time, I’m going to say 2 o’clock.

MR MILLETT: 2 o’clock.
Can we go to your first witness statement, please, previous employment and your role at Kingspan.

Q. I will begin by asking you about your background, your A. No, I haven’t.

Q. I will begin by asking you about your background, your A. Yes, I understand.

Q. At 2.2 you say: “I have been working in the rigid insulation products and insulation systems industry for over 14 years, becoming Product Director at Dow Europe GmbH in January 2004. In that role, I was responsible for the profitability of the Polyurethane business across the European market, driving and implementing the European strategy for the business.”

Q. There is a signature, I think, on the bottom of every page of this document. I don’t need to show it all to you, but is that right?

A. It is, yes, that’s correct.

Q. Those will appear one by one on the screen in front of you, but you should also have them in the file on the desk in front of you as well.

Q. You have provided a witness statement to the Metropolitan Police and I think two witness statements to the Inquiry.

A. Yes, that’s correct.

Q. Now if we could go to your first witness statement to the Inquiry at KIN00000096, please, you say that you graduated from Loughborough University in 1987 with a BSc in chemical engineering; yes?

Q. You joined as a divisional director managing a number of their distribution branches.

A. Yes.

Q. In August 2008, you were promoted to managing director of special markets at SIG, weren’t you?

A. I did, that’s correct.

Q. At 2.2 you say: “I have been working in the rigid insulation products and insulation systems industry for over 14 years, becoming Product Director at Dow Europe GmbH in January 2004. In that role, I was responsible for the profitability of the Polyurethane business across the European market, driving and implementing the European strategy for the business.”

Q. Can we go back to your first witness statement at KIN00000096, please, which is your police witness statement. You identify there that you joined Kingspan in June 2014 as managing director for Britain and Ireland for the insulation business.

A. Yes, that’s correct.

Q. Those will appear one by one on the screen in front of you, but you should also have them in the file on the desk in front of you as well.

Q. You have provided a witness statement to the Metropolitan Police and I think two witness statements to the Inquiry.

A. Yes, that’s correct.

Q. Now if we could go to your first witness statement to the Inquiry at KIN00000554/3, please, you say that you graduated --

A. I’m sorry, that’s not the right one.

Q. You’re right.

Can we go back to your first witness statement at KIN00000096, please, which is your police witness statement. You identify there that you joined Kingspan in June 2014 as managing director for Britain and Ireland for the insulation business.

A. Yes, that’s correct.

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A. Yes, that’s correct.
Q. When you did join, did you join the main board of
Kingspan Insulation Limited, the company?
A. No, it was just -- it was that I had responsibility for
Kingspan Insulation UK, which you define as
Insulation UK, can you account for the difference?
A. It’s clearly me writing it badly. I mean, I should have
referred to it as Kingspan Insulation Limited. I mean, that was the business that I was employed and paid
through.
Q. It’s the same company?
A. Yes, same company, yes.
Q. So did your employer change in the four-and-a-half-odd
years that you were there?
A. No.
Q. No.
A. I’m sorry. Well, yes, it did, actually, because I did
move out of the Insulation business. Sorry, I correct
myself. I moved out of Insulation in December 2018 and
joined the Access Floors business as the managing
director for Europe, Middle East, Africa, and that was
the role that I then left later that year, in late 2019.
Q. As managing director of Kingspan Insulation Limited, or
Kingspan as you refer to it, did you report to anybody
on the main board?
A. Yes, I reported to Peter Wilson.
Q. Peter Wilson?
A. He was my boss, yeah.
Q. Did he have any position in Kingspan Insulation Limited?
A. Yeah, I believe he was a statutory director as well for the period I was there.

Q. But was he also a main board director?

A. Of the group?

Q. Group Plc?

A. He was, yes.

Q. I follow. He was your boss; was he always your boss?

A. He was my boss until I joined the Access Floor business.

Q. So late 2018?

A. End of 2018.

Q. Yes, end of 18.

A. Late. It was October, actually.

Q. October 2019, right.

A. Yes.

Q. What was the reason for your departure?

A. Well, so I left Insulation, Kingspan Insulation, to go into the Access Floors business, because it was an opportunity to learn some new products that I didn’t know anything about, and there was a plan to develop it across Europe, and it just didn’t work out. I didn’t do particularly well, the business wasn’t doing particularly well and I wasn’t enjoying it, and in fact we had a very close family bereavement early in the January of that year, and I just needed a break.

Q. Your move from Insulation to Access Floors, why did you make that move?

A. I think Peter knew that I was keen to develop my career in Kingspan, and I’d been in that role then for four years, was it, and there was an opportunity available, and so I thought it was a good chance to try and get some broader experience within the group.

Q. Did your departure have anything to do with the issues then being uncovered by this Inquiry?

A. No, absolutely not.

Q. How often did you report as managing director to Peter Wilson?

A. Formally we had a monthly review for the Britain and Ireland business, but we would speak informally two, three, four times a month, depending on what the issues were and -- but formally once a month we had a review meeting, and actually a second review meeting where, I think as I’ve said in one of my statements, the group chief exec was there as well, and that was a divisional level review.

Q. We know, because you told us, that you were at SIG in a senior position from January 2005 until May 2014; that’s right, isn’t it?

A. Yes.

Q. Although your position within SIG changed.

A. I think Peter knew that I was keen to develop my career in Kingspan, and I’d been in that role then for four years, was it, and there was an opportunity available, and so I thought it was a good chance to try and get some broader experience within the group.

Q. Did SIG generally undertake compliance or other safety checks of its own on products which had been manufactured by manufacturers with whom SIG had a distribution agreement?

A. I don’t believe they would do, I think they would rely on the manufacturer’s literature.

Q. Did your distribution agreement with Kingspan for K15 include use of K15 on buildings over 18 metres?

A. So the answer is yes.

Q. Did your distribution agreement with Kingspan for K15 include use of K15 on buildings over 18 metres?

A. Yes.

Q. Group Plc?

A. He was, yes.

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Q. We know, because you told us, that you were at SIG in a senior position from January 2005 until May 2014; that’s right, isn’t it?

A. Yes.

Q. Although your position within SIG changed.
A. I would have had an informal chat with John. I don’t think there was a specific agenda, but -- so there were members of -- I was -- as the MD of Kingspan Insulation in the UK -- well, Britain and Ireland, we referred to it -- I would be a member of Peter’s divisional team, as were all of the regional MDs, and then there were a number of other peers, as you would, who were doing functional roles, and I would have had informal meetings with all of them during the first month, I’m sure.

Q. Would that have included Tony Millichap, who was, until May 2015, head of technical?

A. So Tony Millichap reported to me as the -- I think he was technical manager. So I would have -- I think I met Tony on my first day.

Q. Did you have a discussion with him about generally what your job would entail and what --

A. Yeah, we had a very informal chat for probably the best part of an hour, I would imagine.

Q. Were you given an overview of the fire performance issues or fire performances of the product, including the four large-scale fire tests in 2007 and 2008?

A. No.

Q. Did Kingspan bring you up to speed on the various blends that they had been trialling and fire retardants that had been used to try and improve the fire performance of K15?

A. No.

Q. Was there ever a time when they did that?
A. No, the only conversation I do remember being involved with was there was a -- I think it was more of an informal conversation about a blend of blowing agents, which I didn’t completely follow, but I remember being in the room when that was discussed.

Q. Do you know when that was?
A. Well, it was around -- it was when we were looking at launching the lower lambda Kooltherm range, and it was a conversation about the consequence of trying to get a blend that worked with K15, and at that point it took my notice that they were talking -- because that would affect -- they would have to do some more testing on that product to underpin its performance.

Q. I think we may come to that. I think that’s in 2014 though, wasn’t it? So it was quite soon after you arrived.
A. Yeah, I can’t be sure of the date.

Q. Now, can we look at your second witness statement, please, at page 16 {KIN00022662/16}. Let’s look together at paragraph 4.2. You say: “I understood is that K15 is a rigid phenolic foam insulation board. I do not know the precise technical description of K15 being sold to the market during the period June 2014 to June 2017, and as explained at paragraph 3.1 above, it would not be part of my role to have this detailed level of knowledge about one specific product.”

Q. Were you aware of the basic chemicals used to produce K15?
A. I may have been. I couldn’t tell you what they are now. I remember there were some names, but, yeah …

Q. Were they familiar to you?
A. No.

Q. You were a chemical engineer by --
A. Yeah, but phenolic foam was not one of my -- with my experience at Dow in polyurethane foam, I knew the raw materials for those products, but phenolic was something very new to me.

Q. Right.
A. No. I didn’t do it for any of the range, to be honest, including their PIR products.

Q. Did you familiarise yourself with the product literature for K15?
A. Not immediately, no. I think the first piece of literature on K15 that I took note of was the routes to compliance document that I remember being sent just before it was launched, which I’ve seen from looking at documents.

Q. That was July and August 2015.
A. 2015, I believe, yes.

Q. A year or so after you had arrived.
A. Yes.

Q. We will come to that. So that’s the first time, is it, you say you familiarised yourself with K15’s product literature?
A. Other than an initial look at all of the -- I mean, there was a large range of brochures, so I’m sure that I’d asked for a couple of binders for both the PIR range and the Kooltherm range when I joined, and I think they were on my desk for some time, and I would occasionally flick through them.

Q. Did you study them?
A. I didn’t study them, no.

Q. Did you look at a datasheet for K15 dated March 2011?
A. No. No, the only time I saw a datasheet -- I know from reviewing documents that I was asked to sign all of the datasheets. I think they were certificates of conformity, actually. As the MD, I was asked to sign them as the managing director.

Q. Why were you asked to sign the datasheets?
A. I think because they’d previously been signed by Peter Wilson, and of course he was no longer the managing director, and so it was my role.

Q. I don’t think they were datasheets. I think they were certificates of conformity.
A. For whom, for which organisation?

Q. For Kingspan Insulation Limited, for all of their range of products.
A. I think because they’re certificates of conformity, actually. As the MD, I was asked to sign them as the managing director.

Q. Did you sign a certificate of conformity for K15, do you remember?
A. Yeah, I believe we submitted it, I think.

Q. When did you do that?
A. I don’t remember signing it, if I’m truthful. I know it’s my signature. I remember -- the one thing I do remember is there was about 30, and they were presented to me, and I sat and did it, I think, before a management team meeting.

Q. Right. Did you actually investigate the text --
A. No, I didn’t.

Q. -- of the marketing literature or the datasheets for these products?
A. No, I didn’t.

Q. So you just signed off on them without reading them?
A. I did.

Q. Why is that?
A. I just saw it as my job. It was my position as the MD to sign them, and I trusted that the information would...
Q. You didn’t ask members of your team about any of the aspects of the \--
A. I can’t remember asking them, but it would have been my nature to have looked at somebody and said, “I assume that I can sign these”, but I can’t prove to you that I said that, but I just know that my nature would have been to have said \-- to have made some remark.

Q. You say that you didn’t know the precise technical description of K15 between June 2014 and June 2017. Do we take it that it was only after the fire at Grenfell Tower in June 2017 that you acquainted yourself with the precise details of K15?
A. I would say that I started to take a much more detailed interest in it. I mean, I still wouldn’t profess to being anywhere near an expert on the product, but I obviously was interested to know what it was and how it performed.

Q. Now, you had been working in the insulation industry for some ten years or so when you joined Kingspan.
A. Yeah.

Q. Can we take it that you had a reasonable knowledge of the Building Regulations and guidance about high-rise buildings and fire safety?
A. No, that would be a mistake to make that assumption.

Q. When you joined, were you not familiar with the safety requirements under part B of schedule 1 to the Building Regulations?
A. No, I wasn’t.

Q. And so not ADB either?
A. No.

Q. Approved Document B.
A. No. I got to know about ADB really after the tragedy.

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Q. You see, you say "really after the tragedy"; did you ever have cause to look at it before?
A. No.

Q. What about the UK fire testing regime? Did you become familiar with that in any way between June 2014 and June 2017?
A. I mean, I was starting to gain knowledge around BS 8414, and that was the area that I, if anything, listened to, but I -- again, I had some knowledge which really gathered momentum sort of through the late part of 2017. When did you know about BS 8414 start to be gained?
A. Meaningful knowledge, I would have said it was probably during 2015.

Q. Right.
A. So, you know, the year after -- I mean, I was aware of it, and then actually, as Tony Millichap was leaving, the one thing that he, myself and Adrian had agreed was we need to do much more BS 8414 testing, because that seems to be the way of providing evidence to people.

Q. Right. Did Adrian Pargeter sit you down and explain what BS 8414 meant and involved?
A. He explained what it involved. I mean, I’ve subsequently learnt what it is meant to mimic, but I didn’t learn it at that meeting then, no.

Q. You say "that meeting"; was there a meeting?
A. Well, I don’t think there was a formal meeting. I think probably it was around the time Tony was leaving, and we may have not all been in the same room, but I know that I had a conversation with Tony, and I remember one of the things he was talking about was 8414, and I remember talking to Adrian and going, "Well, 8414 seems to be the way forward".

Q. Did you know what it was?
A. All I knew at that point probably was it was a large-scale fire test.

Q. Did you know it was a system test?
A. I probably didn’t even then know it was a system test, no.

Q. Did you know what the criteria were which told you whether you had passed or failed the test?
A. No, I didn’t.
When you joined, what was, can you recall,
12
Q. I see.
10
A. Yes, I believe it was.
8
Q. I'm assuming -- this must follow from what you have been
telling us -- that you had never and were never involved
in any fire testing of phenolic foam, either small scale
or large scale.
6
Q. When did you then first become aware of that
distinction?
4
A. If I'm honest, I think there was -- I realised in 2015
that there was clearly a part 1 and a part 2. I don't
think it was until, again, late 2017 where I started to
understand the difference between masonry and structural
steel.
2
Q. I see.
0
A. Were you aware in June 2014, when you joined, that
K15 was not a material of limited combustibility?
16
Q. Were you aware that a BS 8414-1:2002 test was a system
test for masonry construction, as opposed to a part 2
test, 2005, for steel-framed construction?
14
A. I am aware now. I wasn't aware when I joined Kingspan.
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Q. I see.
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A. Were you aware in June 2014, when you joined, that
K15 was not a material of limited combustibility?
Q. Right. And was part of that concern because he was doing extramural study?
A. Correct, yes, that is correct.
Q. Was it the plan, when amalgamating these departments, that technical should become subservient to marketing?
A. No, absolutely not.
Q. How could the head of marketing also have the required skills, ability and resource to head up the technical department?
A. I think, as I’ve explained, Adrian has a technical background, and actually the intention was to bring somebody in, as we did, into the marketing team to lead that team, but not at the level of the management team, because we’d had so much difficulty finding somebody at that level.
Q. Right.

Now, I think you have answered this question, but just so I get it right: we know that the amalgamation coincided with the departure of Tony Millichap as head of technical. Did he leave because of the amalgamation or was his departure the catalyst for the amalgamation?
A. I mean, what Tony Millichap told me was – I know that he had thrown his hat in the ring for one of the divisional roles reporting to Peter, I think there was a technical director role, and he hadn’t got it, and

I think he was disappointed by that. I didn’t want to lose Tony, but he had been offered another job and so, you know, he left, but he left on good terms.
Q. That’s not quite an answer to my question.
A. He left, but did he leave because of the amalgamation, or was his departure the catalyst for the amalgamation?
Q. Was it you who decided to appoint him as head of the amalgamated department?
A. I’m sorry, his departure ultimately led to the amalgamation. Sorry.
Q. Adrian Pargeter was the head of marketing at that time, wasn’t he? And he had only occupied that role for about six months, namely from November 2014.
A. Yeah.
Q. Was it you who decided to appoint him as head of the amalgamated department?
A. It was, but in discussions with Peter Wilson.
Q. Was there a selection process or was he just a shoe-in?
A. There was a selection process for the head of marketing role, and I think – I mean, I’m not able to check my emails anymore, but I do think I discussed with HR whether or not we needed to actually advertise the amalgamated role, or because it was amalgamated, we could just appoint. I can’t be sure, but I think under their advice I was able to just appoint him into the amalgamated role.
Q. We touched on this a moment ago, but what particular skills did you perceive in Adrian Pargeter that suited him for this blended role that you had created?
A. Very organised, very methodical, very trustworthy, very good at managing people, and one of the things we needed to do in both the marketing team and the technical team was start to show some progression for people and make sure that we were developing them.

Q. Were you looking for somebody with enough technical knowledge and experience to be able to talk his way out of trouble when posed by a difficult customer?
A. Okay, no, that’s not the reason, not what I was looking for at all. Actually I was looking for somebody with enough technical knowledge; I was looking for somebody with a lot of technical knowledge that actually could manage the teams who were providing the data that would of course go to the marketing team, but I was looking for somebody with a lot of technical knowledge, and I thought Adrian was that person.

Q. Was Ivor Meredith ever considered for this role?
A. Erm... no, I don’t believe he would have been.
Q. Why is that?
A. Well, there were already some issues over his performance, and actually he was -- you know, he was, at the time, from what I could see, the person that really understood fire, and so I think he was well suited to that role. We were trying to build a team around him and he wasn’t too keen on that, so that was a job in itself.

Q. What was the problem with him really understanding fire?
A. No, he didn’t have a problem. I’m saying he was the person that understood fire.

Q. Was Ivor Meredith ever considered for this role?

Q. When Adrian Pargeter arrived, did he report to you or managing a team of people, and I don’t think he had, from what I felt, the broad breadth of experience that I would have expected of somebody in that role.
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Q. What about John Garbutt, how often did he report to you?
A. John didn’t report to me; John reported to Peter Wilson.

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Q. You say in your second statement at paragraph 3.3 at
A. That didn’t occur to me, no.
Q. When you discovered the fact that there had been a change in
manufacturing process, did you think to look at the 2005
test?
A. I didn’t, no.
Q. Did you think back to your days at SIG before June 2014
and ask yourself whether SIG had been selling K15 on
a false basis, namely that it was a product which had
passed a fire safety test when it hadn’t?
A. No, I had no reason to think that.
Q. Now, the Inquiry’s heard evidence from Ivor Meredith and
has gone through the notes of his appeal hearing that he
had with you on 3 September 2015.
Do you agree, from your recollection of that
process, that you were told of the fact of the change in
technology from old to new by Ivor Meredith at least by
then, at that time?
A. By the time of his appeal?
Q. Yes.
A. Yeah, I would have known -- I think I knew about it
during -- I mean, I would imagine I picked it up during
2015, and so before his appeal, yeah. No, I would have
been aware.
Q. Yes, I was going to ask you, because you don’t appear
from the notes of the disciplinary appeal hearing to
display any shock or surprise on hearing that
Ivor Meredith was telling you about the change in --
A. Yeah, no, I definitely knew of it before then.
Q. When you discovered that there had been a change in
marketing literature and generally?
A. I really don’t remember.
Q. How did you become aware of it?
A. I would describe it as an anecdotal comment that
I picked up on.
Q. From whom?
A. I don’t remember.
Q. Right.
A. I didn’t know the date, but I certainly knew that, from
the date I joined, we were selling new technology foam.
So I assumed it went back quite some time, but
I wouldn’t have known the exact year.
Q. Right.
A. I didn’t know the test.
Q. When you discovered that there had been a change in
marketing literature and generally?
A. I honestly cannot remember when I was made aware of that
test.
Q. In general terms, were you aware, either on or after
your arrival at Kingspan in June 2014, that Kingspan
were relying on the 2005 BS 8414 test both in its
marketing literature and generally?
A. Well, I definitely know that when I read the routes to
compliance document, it was one of the tests that was in
that document.
Q. Yes.
A. And what I’m struggling to remember is: did anybody sit
down and tell me, before I read that document, “This is
a 2005 test”, which I believe was part 1, “and
here’s” -- I never had that conversation, so ...
Q. When did you read the routes to compliance document
which was sent to you in late July 2015 and was
published in August of that year, you would have
realised that K15 was being marketed for buildings over
18 metres, wouldn’t you?
A. Yeah, no, I definitely knew of it before then.
Q. Right, and you have answered a question, actually, which
I picked up on.
A. I mean, I would have been made aware of the test.
Q. Did you think back to your days at SIG before June 2014
and ask yourself whether or not it had been new technology on
which the 2005 test had been conducted or old
technology from old to new by Ivor Meredith at least by
then, at that time?
technology?

Q. Right.

A. It wasn’t until some time later that I realised or was told that it was actually a -- I think it was after all of the work started for the Inquiry.

Q. Right.

Now, can we go to page 79 of this statement (KIN00022662/79), please. This is, in the middle of the page, question 144, and it is:

“What tests do you think Mr Meredith asserted that Kingspan were unable to repeat? Did you agree with him?”

Your answer is at paragraph 13.80 and 13.81, and you say at 13.80:

“13.80. My understanding is that Ivor was referring to the 2005 BS 8414 test.

13.81. I understood that Insulation UK were no longer able to manufacture old technology K15 foam as they did not have the same manufacturing equipment and therefore could not repeat the test. On that basis, I agree with Ivor that the 2005 BS 8414 test could not be repeated. This is still my understanding.”

A. What I remember from the meeting was it was an extremely emotionally charged meeting, and he was -- as a lot of people do when they’re in that type of a meeting, he was very emotional, and so a lot of things -- people do say things to grab your attention, and I wasn’t -- you know, there was nothing here that I went, ”Well, blimey, I need to check that.”. We were already -- I had spoken to Adrian. We were already checking a lot of the things around Ivor’s work as a consequence of his performance.

Q. Well, let’s just break it down then. I’ve tried the general approach, and I hear what you say about that. He says, fourth line down:

“I have performed in a number of tests in 2005, Kingspan changed the technology of our foam and we couldn’t repeat those tests.”

Pausing there, was that something that you knew or was that news to you?
A. Which piece, sorry?

Q. The sentence I have just read to you.

A. Would you mind reading it again?

Q. Yes, of course. Fourth line. Let’s read it together:

“I have performed in a number of tests in 2005, Kingspan changed the technology of our foam and we couldn’t repeat those tests.”

Now, was that something that you were hearing for the first time or was Mr Meredith telling you something you already knew?

A. Well, no, I was aware that we’d changed how we made the foam, so I didn’t think we could make that foam again, so we wouldn’t have been able to test it.

Q. So you knew that there had been a change in technology, and when he says, “we couldn’t repeat those tests”, was that news to you?

A. Again, my reading and from my memory is I thought he was referring to the fact we couldn’t make that foam anymore, so we wouldn’t have been able to test the old foam.

Q. And because you couldn’t make that foam anymore, the test done in 2005 was a test done on now outdated foam, which you were no longer selling.

A. Yeah, and I didn’t connect that.

Q. You didn’t connect it? It’s quite clear, isn’t it.

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1. that’s what he’s --
2. A. No, it is very clear.
3. Q. Then he goes on:
4. “We were outed by a consultant who we then had to fabricate a story to that the product still said what it did not [on] the tin.”
5. “Just pausing there, was that news to you?”
6. A. Erm ...
7. (Pause)
8. I don’t think it was, but I don’t think -- I don’t really know what he was referring to.
9. Q. We don’t have a record here of you asking him. I mean, you don’t say to him, “Well, Mr Meredith, what are you talking about?”
10. A. I mean, he was -- his answers were very rambling, very quick, so to some extent I was taking what he was saying with a pinch of salt.
11. Q. Well --
12. A. This was a man who had admitted to a serious drug problem, and was just making a lot of spurious claims, and a lot of it I just felt was wrapped up in his emotion of, “If I say something, they might keep me”.
13. Q. Well, help me with this. There are two reasons, aren’t there, for not reacting; one is this is not a surprise to you and you’ve heard it all before anyway, and he is not telling you anything new -- yes? That’s one possibility?
15. Q. And the other possibility is that you don’t believe a word of what he is saying. Which was it?
16. A. Well, I would have to say that it was probably the former, that I must have known about somebody believing that there was a story, and somebody must have told me that that had been closed, but I can’t ... I mean, I’m not for a minute saying he was telling lies, but it wasn’t something I went, “Oh, well, I need to check that”. But I just can’t remember.
17. Q. Well, I can understand that, that you can’t remember exactly, but I’m showing you this record and you say, as you said a minute ago, that he was making a lot of spurious claims. What spurious claims was he making?
18. A. Well, there was a number of things. If you read all of the document, it was just he was saying some silly things.
19. Q. What spurious claims was he making, Mr Burnley?
20. A. Well, I’d have to look at -- I mean, if we went through the document, I could -- a number of the things, I just think.
21. Q. Right.
22. A. Well, my belief -- based on my belief -- I mean, it’s like there, “where we cannot support the performance of the product”. My understanding was that we could.
23. Q. So when he said that it couldn’t be, you were either surprised by that or you didn’t believe a word of what he was saying?
24. A. I believed -- well, my belief at the time was that we could.
25. Q. So you didn’t believe a word of what he was saying?
26. A. I was struggling to put a lot of credence behind what he was saying, and partly because of the way he was saying it.
27. Q. What was the basis at the time of your belief that the performance of the product could be supported by a test?
28. A. Because that was what I was being told by the people around me.
29. Q. Right.
30. When he said, “we then had to fabricate a story to that the product still said what it did not [on] the tin”, did you believe him or had you heard it before?
31. A. I don’t think I’d heard that before. I mean, there were lots of people asking us questions, rightly, about the performance of the product, and I generally believed that it did because that’s what I was being told.
32. Q. He says at the end there:
33. “I wasn’t the senior person there, we produced
undertake an investigation internally as to whether
because of his agenda, as you saw it, nonetheless to
sceptical about Ivor Meredith because of his conduct or
did it not occur to you, even though you may have been
because of his agenda, as you saw it, nonetheless to
undertake an investigation internally as to whether
Q. Can you explain why you didn't make that connection?

A. I can try. I mean, I think the thing -- again, I saw them as two separate matters. So there was an appeal into somebody who had been -- somebody decided to fire, and then there was a document, and my view was that there was such a sort of safety net around the technical group that would have been approving the documents and the accuracy of the information, I had no doubt to question the accuracy of that document. And then I had a very sad situation here on an employee, and I didn't -- I just didn't connect the two.

Q. So --

A. I just didn't connect the two things.

Q. You didn't connect the two things. So you didn't connect the obsolescence of the 2005 test, as Mr Meredith was telling you, the misleading of the market in the meantime, on the one hand, with the fact that Kingspan was still trumpeting the BS 8414 test as the basis or one of the bases for selling K15 as at August 2015?

A. I didn't connect them, no.

Q. Can you explain why you didn't make that connection?

A. I can try. I mean, I think the thing -- again, I saw them as two separate matters. So there was an appeal into somebody who had been -- somebody decided to fire, and then there was a document, and my view was that there was such a sort of safety net around the technical group that would have been approving the documents and the accuracy of the information, I had no doubt to question the accuracy of that document. And then I had a very sad situation here on an employee, and I didn't -- I just didn't connect the two.

Q. Why weren't you prepared to give him any credence in what he is referring to.

A. I think, with hindsight, it was a mistake on my part. I mean, it's -- I have to accept that, when you read it on the paper now, it's something where you just go, "I can't believe you don't do something about that". But at the time and the way it was said, it had less impact than the written word.

Q. Well, all right. Making all allowances for being there, and I accept that you were there and we were not, and it may have been an emotional moment and he may have been in a state, but you are being told, at least in two places, in the context of something that you recognised as being of some importance, was this statement made?

A. Well, on this I was aware, so I was already hearing that, you know, we had issues with the NHBC, so in my mind I was linking this to the NHBC and thinking: that's on my radar, I know we're dealing with that, I'm sure that's what he is referring to.

Q. Yes, and "to justify our lie", did that not jolt you into life?

A. I mean, it's -- I have to accept that, when you read it on the paper now, it's something where you just go, "I can't believe you don't do something about that". But at the time and the way it was said, it had less impact than the written word.

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I could put it down. But I did feel that the security in the note, the safety net around our technical know-how was not secure enough that I could rely on the opinions of others.

Mr Meredith and he'd said these things, which at least had been recorded as they have in the record of that, you then didn't do anything about it.

Of course.

SIR MARTIN MOORE-BICK: No, no, if you're going to a new topic, I suggest we have our break now.

Mr Burnley, I'm not standing here asking you questions about the due process of Kingspan's disciplinary procedures or your role in the disciplinary process itself. What I'm seeking to get to the bottom of is, having been told what I have shown you on the record Ivor Meredith told you, in the places I have shown you in the record of that, you then didn't do anything about it.

THE WITNESS: Of course.

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

Thank you. 3.30, then, please. Thank you.

(Pause)

Thank you. 3.15 pm

(A short break)

Thank you. 3.40 pm

SIR MARTIN MOORE-BICK: Mr Burnley, I'm sorry we have kept you waiting longer than I'd expected. Something cropped up which we will have to deal with, but we're ready to go on now.

MR MILLETT: Thank you, Mr Chairman.

Mr Burnley, I'd like to take you to [KIN00024104], please. This is a letter written by Kingspan on
A. I was given access to a lot of documents, yes. I can’t say I was given access to all of my emails, by the way.

Q. Right.

A. I don’t think I did nothing. The -- I think the issue that you’re referring to is the fact I had not connected the fact, the reliance on the 2005 test and it not being the product that was being sold. What I was focused on and what I was doing was trying to drive forward a better understanding with people that needed information, and that was what I know Adrian Pargeter and his team were focused on, was trying to work out: well, what tests do we need to do that give people information in relation to representative systems?

Q. At the point you left in 2019, how far had an investigation into whether standard K15 being sold in the market was the same product as tested in 2005? How far had it got?

1. I was given access to a lot of documents, yes. I can’t say I was given access to all of my emails, by the way.
2. But, I mean, there’s only so much I can do, and I’ve done the best I can.
3. Right.
4. Q. Right.
5. A. I don’t think I did nothing. The -- I think the issue that you’re referring to is the fact I had not connected the fact, the reliance on the 2005 test and it not being the product that was being sold. What I was focused on and what I was doing was trying to drive forward a better understanding with people that needed information, and that was what I know Adrian Pargeter and his team were focused on, was trying to work out: well, what tests do we need to do that give people information in relation to representative systems?

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A. Yes, I believe I was aware that we were trying to repeat the test, I think to see that the standard foam performed in the same conditions, would be my understanding, I think.

Q. You say you believe you were aware; were you involved with that effort?

A. No, not directly.

Q. How were you aware?

A. I mean, I don’t know. I mean, I have in my mind --

1. I was given access to a lot of documents, yes. I can’t say I was given access to all of my emails, by the way.
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Q. Right.

Can we look at {KIN00008847/2}, please. This is a report written by Ivor Meredith dated 7 January 2008. Can we look, please, at page 2 {KIN00008847/2}. This is an executive summary. Do you see that?

A. Yeah.

Q. It explains the test that was done under BS 8414-2, and identifies the project stakeholders, and then the result at the bottom of the page:

"By 17 minutes the top fire barrier had breached and the raging inferno moved up to the top thermocouples and pushed them past 600 degrees thus failing the simple criteria of BR 135."

Did you see this report at any time after your arrival at Kingspan in June 2014?

A. I don't believe I've ever seen this report.

Q. Did anybody tell you that back in 2007, K15 had been subjected to a BS 8414-2 test and a raging inferno had resulted?

A. I don't recall that, no.

Q. You would have remembered that, wouldn't you?

A. The words I would remember.

Q. Was it made clear to you when you arrived at Kingspan that obtaining a successful pass to BS 8414-2 was a priority for Kingspan?

A. I mean, I would have thought so, yes.

Q. You say you would have thought so; do you recall?

A. I don't recall, no.

Q. Right.

Now, I want to ask you about the LABC certificate for K15. Can we look at your second witness statement, please, and go to paragraph 9.4 at the foot of page 39 {KIN00022662/39}.

You say there, under your response to Inquiry question 52:

"What did you understand to be the purpose of obtaining an LABC System/Type Approval Certificate or Registered Details certificate for K15?"

"9.4. I did not know for sure the purpose of obtaining an LABC certificate for K15 and I still do not know. However, I assume it would be to demonstrate that the product was fit for purpose."

Now, you had been in the building industry or the products industry for many years, and you had been at SIG for about nine years, 2005 to 2014. Was it really the case that you were unaware, and are still unaware at the time you wrote this statement, of the purpose of obtaining a system approval from the LABC?

A. I'd never heard of the reference to an LABC. I mean, I've heard of registered details, I know of, but the -- when I joined Kingspan, everything was focused on BS 8414 testing, and so I -- it was not something I was familiar with.

Q. You say you have never heard of the reference to an LABC. As at June 2014, had you actually heard of the LABC?

A. Yeah, I knew of the LABC.

Q. Right. So you were aware of the LABC. Were you really not aware of the purpose of obtaining an LABC certificate?

A. I can't say I was, no. I mean, I've never had a technical role in the building industry, I've always been involved in the commercial side.

Q. Did you never come across the usefulness of having an LABC certificate on the commercial side in order to sell products to customers?

A. The honest answer is no.

Q. Really? In all the time at SIG, did no customer ever ask you for an LABC certificate?

A. That's why I make comment on the registered details.

Q. That's why I make comment on the registered details. I was aware of registered details, not in any great

Q. Well, I know, but what's it based on?
Q. It’s the right thing to do.

A. I don’t, and in fact it’s now triggered something.

Q. Well, a belief is normally based on some data, some empirical foundation; no? Not all beliefs, I accept, but a commercial belief or a technical belief must be based on something to go on.

A. I don’t, and in fact it’s now triggered something.

Q. When you say, “that was the first I’d heard about it”, can you just elaborate? When was the first --

A. I didn’t recall knowing anything about the statement here of it being a material of limited combustibility, or indeed I hadn’t seen the certificate.

Q. Just so I’m clear, are you telling us that it was only during the evidence in this Inquiry that you saw the certificate and realised that you didn’t know about it?

A. Could you ask that again? I’m sorry.

Q. I’m trying to understand your evidence. Let’s take it in stages.

A. I don’t recall seeing it at all.

Q. So is it right that the first time you saw this and focused on what I’m putting to you here was during the evidence in this Inquiry?

A. Yeah. I’m not sure I saw it when the evidence was -- but I heard it talked about.

Q. Right.

Q. Well, let’s see how we go then.

A. It’s the right thing to do.

Q. Under “Validity”, it says:

A. I don’t, and in fact it’s now triggered something.

Q. It’s right, isn’t it, as I think you would accept, that K15 is not suitable for use in all situations as shown in diagram 40, is it?

A. I’m not familiar with diagram 40, I’m afraid, but ...  

Q. Now, Mr Millichap said that this was a stretch. That’s [Day81/144].

A. I don’t, and in fact it’s now triggered something.

Q. And you can’t explain how the errors in this certificate came to be there?

A. No, I can’t.

A. I don’t, and in fact it’s now triggered something.

Q. I say, well, I do think that we would -- you know, I say, well, I do think that we would -- you see that?

Q. What were you going on in order to have the belief that the LABC details were correct?

A. Well, okay, I think -- I mean, I’ve answered the question in the same way that I answered the questions about test reports I think earlier in the witness statement, where I’ve just said the same ending, where I say, well, I do think that we would -- you know, Insulation UK would have checked, because it’s a logical thing to do, that if you’re doing testing and you’re getting a report, you make sure that it’s the right content.

Q. Now, let’s look at [NHB00000798], please. This is the new registered details certificate issued by the LABC on 30th August 2013 and is valid until 30th November 2014.

Q. So you had been at Kingspan about two months or so as managing director.

Q. You were the managing director at the time of issue; was it?

A. No, I really don’t think I did.

Q. Well, let’s see how we go then.

A. Yeah. I’m not sure I saw it when the evidence was -- but I heard it talked about.

Q. Right.

Do you remember reading this certificate at the time?

A. I don’t.

Q. Well, let’s see how we go then.

A. I don’t.

Q. Going over to page 3 [NHB00000798/3], in the middle of the page there you will see a heading, “AD B Fire Safety”, do you see that?

A. I do.

Q. It says:

A. I don’t.

Q. Where were you going on in order to have the belief that the LABC details were correct?

A. Well, okay, I think -- I mean, I’ve answered the question in the same way that I answered the questions about test reports I think earlier in the witness statement, where I’ve just said the same ending, where I say, well, I do think that we would -- you know, Insulation UK would have checked, because it’s a logical thing to do, that if you’re doing testing and you’re getting a report, you make sure that it’s the right content.

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Q. Well, let’s see how we go then.

A. Yeah. I’m not sure I saw it when the evidence was -- but I heard it talked about.

Q. Right.

Q. Well, let’s see how we go then.

Q. Let’s have a look at K15 now. If you look at the foot of the page.

A. I don’t recall seeing it at all.

Q. So is it right that the first time you saw this and focused on what I’m putting to you here was during the evidence in this Inquiry?

A. Yeah. I’m not sure I saw it when the evidence was -- but I heard it talked about.

Q. Right.

Q. Well, let’s see how we go then.

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A. I don’t.

Q. Well, let’s see how we go then.

A. Yeah. I’m not sure I saw it when the evidence was -- but I heard it talked about.

Q. Right.
Q. And that you are accountable for these misleading and erroneous statements?

A. I’m not sure that I can be accountable. I was two months into the company. I don’t understand necessarily the technical detail. I’m not technically qualified. I mean, I can obviously see it’s saying -- it would certainly make me ask the question, “Why are we saying it’s limited combustibility?”, because my understanding was that K15 wasn’t under the test that they use, so it would have at least made me, had I read it, say, “Why is that in there?” But I didn’t see it, so I don’t think I can be held accountable for it.

Q. How can you account, then, how can you explain, how such a fundamental error and such a misleading statement could be made to the market without you knowing about that?

A. I don’t know.

Q. 2014 test. I would just like to ask you about that. Do you recall that, on 7 July 2014, just after a month or so after you joined Kingspan, Kingspan tested a product that it called K15 to BS 8414-2 using a terracotta tile cladding rainscreen system at the BRE?

A. I mean, yeah, I think I would have been aware that there was a test going on. I wouldn’t have understood the relative importance of part 2. I do remember the terracotta tile part, I remember, and clearly that became more important to me as my knowledge developed.

Q. Is it right that when that test was passed, what purported to be Kingspan K15 had passed for the first time since 2005 a large-scale fire test?

A. (Pause) Let me try again, you’re looking puzzled at my --

Q. I’m trying to understand. It was a long question, I’m really sorry.

A. Well, this was the first time since 2005, wasn’t it, that Kingspan K15, or what purported to be Kingspan K15, had passed a large-scale fire test?

Q. You’re asking me at that time when the test was done?

A. Yes.

Q. I wouldn’t have known. I wouldn’t have known. I’d been there a month or two.

Q. Right.

Let’s look at your second witness statement, please, page 23 (KIN00022662/23). You set out question 30a: “Who within Kingspan held overall responsibility for planning and arranging testing to BS8414 on systems incorporating K15?”

And your answer at the foot of the page was:

“I think that members of the Technical team would have held overall responsibility for planning and arranging BS 8414 testing ...”

Then b:

“More broadly, who was responsible for Kingspan’s strategy in relation to tests to BS8414 and for planning testing programmes?”

Then if you turn the page (KIN00022662/24) to paragraph 5.27, you say:

“My understanding is that the Head of Technical (or the Head of Technical and Marketing post May 2015) and the Technical team would make proposals in respect of the strategy in relation to BS 8414 tests and suggest plans for the testing programme. These proposals would be discussed with members of the Divisional team, for example at the Britain and Ireland review meeting. I understand that the testing strategy and programme would have developed each year descending on the outcome of previous tests:”

You then say at 5.31 on page 25 (KIN00022662/25):

“My understanding was that the Divisional Managing Director, Division Marketing Director and Divisional Technical Processing Director had input into the BS 8414 testing strategy and programme and would make decisions on strategy and testing programmes in light of the proposals put forward by the technical team (as described in paragraph 5.27). It would then be the responsibility of my team, particularly the Technical team, to implement the agreed testing strategy.”

Can you just explain, who held the roles that you describe when you began at Kingspan in 2014? Who was the divisional managing director?

A. Peter Wilson.

Q. And the divisional marketing director?

A. Was John Garbutt.

Q. And the divisional technical processing director?

A. Gwyn Davies.

Q. That was Gwyn Davies, right.

So is it right that those gentlemen at divisional level would have had knowledge of the testing programmes in light of the decisions that were being made on strategy?

A. Yes, they would.

Q. And can you confirm that those plans for testing once you arrived were discussed with you and the divisional director, Peter Wilson?

A. I mean, I would say I was made aware of them.

I wouldn’t say they were discussed with me. I mean,
I wasn’t providing any great input.

Q. Were you briefed about the July 2014 test before it took place?
A. No. I don’t believe so.

Q. Were you briefed after it took place?
A. I think “briefed” would be a strong word. I was probably told that it had -- you know, what had happened, but I didn’t see a report on the test or --

Q. Right.

When you say you were probably told what had happened, who would have told you that?

A. I don’t, no.

Q. Was there a report to you about what had happened at the test?
A. No, I mean, Tony used to write emails, so he may well have sent me an email on it, but I wouldn’t -- I didn’t see a test. I don’t remember seeing a test report for sure. And he probably wouldn’t have sent it to me because he probably would have realised I was likely not to read it.

Q. Did he tell you that the test had been undertaken on solstice -blown K15 with a 50-micron facer perforated on one side only?
A. Oh, no.

Q. Did he tell you that, in fact, standard K15 being sold, unlike what was tested, had a 25-micron foil and was perforated on both sides?
A. I don’t recall. I doubt it, but I don’t recall.

Q. And that it was made with a different blowing agent?
A. No. I mean, I’ve heard this in other evidence and I -- I don’t think it came to my knowledge that it was a solstice foam probably again until we’d started doing all of the detailed work around the Inquiry.

Q. Doing the best you can with your recollection, were you under the impression at the time, July 2014, that the test that had been carried out in that month under BS 8414-2 had been done on standard K15 being sold?
A. I did, yes.

Q. When did you learn that that was not the case and that what had been tested was in fact a research and development product?
A. Again, I can’t be sure, but I don’t think I became aware of that until we probably started doing a lot of analysis for information for the Inquiry.

Q. Right.

A. But I’m not certain. Even hearing the evidence, I can’t even -- I’m not sure if it’s not from hearing the evidence that I’m now aware. It’s difficult.

Q. Tony Millichap told the Inquiry -- and it’s [Day82/77:3] and following -- that it was common knowledge at Kingspan at the time that the test was undertaken on a trial product that was different from the product being sold. He said it was common knowledge; do you agree with that?
A. It may have been common knowledge amongst the technical fraternity, but it wasn’t my common knowledge.

Q. I want to ask you now, moving forward in the year 2014 to November, about an email sent to you by Tony Millichap on 12 November that year, {KIN00021810}.

Now, the subject heading, as you can see on the email, is “K15 testing direction”, and it’s an email sent from Ivor Meredith at the top of the page on 14 November to Adrian Pargetter, sending on an email that he and you had received from Tony Millichap on 12 November, and I want to focus on the main email there.

It refers, as you can see, to a meeting earlier that day, and talks about the successful BS 8414-2 test that Celotex had recently passed.

Do you remember that meeting?
A. No, I don’t remember the meeting. I mean, I’ve seen this email before in documents in preparation for this.

Q. Did he tell you that the test had been undertaken on Celotex had recently passed.
A. No. I mean, I’ve seen this email before in documents in preparation for this.

Q. Was that a meeting between you, Mr Meredith and Mr Millichap?
A. I don’t know. I can’t recall.

Q. Okay.

Do you remember having a discussion about Celotex and its marketing blurb and it being vague about the test construction at the time?
A. No, I don’t. I’m just reading it, because I’m not sure whether he was actually -- I don’t know whether that was part of the meaning. I mean, it could be.

Q. Well, it says in the first sentence:

"Further to our meeting of earlier today I have set out our understanding of the published Celotex RS5000 result and its current impact."

A. Yeah.

Q. ‘Initially having sourced a copy of Celotex marketing blurb we were not surprised of the vagueness surrounding the specifics of the test construction, notably around provision of firebreaks.’

Do you remember having a discussion along those lines before this email about Celotex RS5000?
Q. Why was there a doubt about that, did you think, at the time, that would justify or require support of that 25
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A. I don’t. I don’t. But I actually think -- my reading of that is he has come and told me about a result for Celotex RS5000, and I think he’s now telling me they’ve sourced some material, some literature.

Q. Let’s look at the fourth paragraph down. We can see that Mr Millichap says:

“We are only aware of one project where the Celotex product has been adopted which involved the same supply chain as their test programme, we have yet to be asked to defend specification against the product, we are actively involved in supporting 60+ projects specifically on the over 18m issue. Whilst we had to financially support the project at First Street, Manchester this specification held and we have not lost a specification since. Feedback from specialist sub contractors, specifiers and consultants all raise doubt over the ‘Celotex solution’.

When he says that they’d been asked to defend specification against Celotex, what did he mean, did you think?

A. I’m assuming that means that where there is a project where K15 is being specified, nobody had yet contacted us saying, “We’re thinking of changing the specification to the Kooltherm” -- sorry, “the Celotex product”, is how I read that.

Q. All right, the team.

A. I don’t know. I don’t think my knowledge of K15 and its use was at the level where I would have known what to ask, so I would assume that he knew what he was talking about and...

Q. Well, what did you think he meant?

A. Well, providing technical evidence that the product can be used to support the specification.

Q. Why was there a doubt about that, did you think, at the time, that would justify or require support of that nature?

Q. That’s what I’m asking about.

A. I don’t. I don’t. But I actually think -- my reading was at the level where I would have known what to ask, so I would assume that he knew what he was talking about and...

Q. Well, what did you think he meant?

A. Well, providing technical evidence that the product can be used to support the specification.

Q. Why was there a doubt about that, did you think, at the time, that would justify or require support of that nature?

A. I don’t. I don’t. But I actually think -- my reading of that is he has come and told me about a result for Celotex product used over 18 metres. Were you not interested to read the detail of what Mr Millichap was sending to you?

A. Well, I was, but I think -- so he is referring to Celotex -- so I was a strong believer in we ought to just stick to what we were good at and not really worry about what the competition were doing, so I was aware that there was a -- some questions in the business about how Celotex could have passed a test, and so it’s quite possible that I’ve read that, seen Celotex mentioned a number of times, and my eye would have probably gone down to the solstice piece at the bottom and I wouldn’t have really digested the bit in the middle about Celotex.

This was -- I mean, it’s 12 November 2014.

Q. Yes, and you have been there almost six months.
Q. So was this the first time you became aware, or were you already aware, that the product being tested in July 2014 was not Kingspan K15 as sold?
A. I didn’t realise that -- at this point I didn’t realise that the K15 that had been tested in June that year was the -- I think it was called K115.

Q. How would you read that paragraph I’ve just read to you, thought? “To revert to testing standard NT K15 will not support the strategy we are pursuing ... but will signal a backwards step with significant consequence”? What did you understand by that?
A. Well, I don’t -- he is not specifically talking about the blowing agent and facer thickness had significant impact. All testing has been referenced back to precise batches with control samples as is a requirement of BRE however this does not include a description of the physical differences.”

Q. And you can’t recall a time when standard NT K15 was regarded as a product that would pass?
A. My recollection at this time was that actually testing -- I mean, new technology, it wasn’t new, but the K15 that we were selling, the whole strategy in my mind was we were looking to develop a bank of passed 8414 tests to assist the NHBC. That was what came out of sort of the meetings that I went to. They were looking for more evidence, and the way to do that was for us to get 8414 tests to show them that it could be used.

Q. So not small-scale tests, full scale?
A. Yeah, no, absolutely.

Q. Then in the next paragraph he says: “The above approach assumes we continue to acknowledge differences between the tested products (both blowing agent and facer thickness have significant impact). All testing has been referenced back to precise batches with control samples as is a requirement of BRE however this does not include a description of the physical differences.”
Q. No acknowledgement was given to anybody in 2014 of those differences, was it?
A. Well, no, because we weren't selling solstice-blown foam. This was a development project.
Q. Exactly. And you knew that by this time.
A. Yeah, that was my understanding, yes.
Q. And therefore --
SIR MARTIN MOORE-BICK: Mr Millett, I'm sorry, I'm going to have to interrupt you, I'm afraid, because there is a matter that we need to deal with before we get to the end of the afternoon.
MR MILLETT: Mr Chairman, yes.
SIR MARTIN MOORE-BICK: An administrative matter has cropped up which I need to consider and deal with before the end of the afternoon, so we're going to take a short break at this point.
I'm sorry to interrupt your evidence. It's annoying for everybody, but I'm afraid that's the case.
We will sit again at 4.30 and take the matter up then. All right?
4.30, please.
(4.17 pm)
(A short break)
(4.30 pm)

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THE WITNESS: Understood, yeah.
SIR MARTIN MOORE-BICK: -- until you have finished giving your evidence in the New Year. Is that all right?
THE WITNESS: Yeah, I fully understand, yeah.
SIR MARTIN MOORE-BICK: I'm sorry to cause you this inconvenience, but I'm afraid we have no choice.
So, as far as you're concerned, I'm going to let you go now, and we will be in touch with you as soon as we can to discuss alternative dates.
THE WITNESS: Okay.
SIR MARTIN MOORE-BICK: Thank you very much for coming today. We certainly didn't anticipate this would be the problem.
THE WITNESS: No, I understand. It's difficult times.
SIR MARTIN MOORE-BICK: Thank you for being here today anyway.
THE WITNESS: Thanks.
SIR MARTIN MOORE-BICK: Thank you.
(The witness withdrew)

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Q. And therefore --
SIR MARTIN MOORE-BICK: -- until you have finished giving your evidence, please do not talk to anyone about your evidence or anything to do with it in the intervening period. Now, I quite understand that may be difficult in some respects, but you don't work for Kingspan anymore, do you?
THE WITNESS: No, I don't.
SIR MARTIN MOORE-BICK: So you have no need to see colleagues at Kingspan or former colleagues at Kingspan, and although I'm sure people will want to ask you about being at the Inquiry and giving your evidence, I'm afraid I must ask you, please, to tell them that you're not allowed to talk about it --
THE WITNESS: Understood, yeah.
SIR MARTIN MOORE-BICK: -- until you have finished giving your evidence.

---

It's extremely disappointing. I'm very sorry to have to give you all this news, but we feel there is nothing we can do to keep ourselves going in the interim.

Now, Mr Burnley, what that means as far as you're concerned, I'm afraid, is that we're going to have to ask you to come back some time in the New Year. I'm sure it's very inconvenient, and we will do our best to make sure that we can find another date which is as convenient to you as possible when you can come and finish giving your evidence.

But the other thing I need to say to you is: please do not talk to anyone about your evidence or anything to do with it in the intervening period. Now, I quite understand that may be difficult in some respects, but you don't work for Kingspan anymore, do you?

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Q. And therefore --
SIR MARTIN MOORE-BICK: All right, Mr Burnley, just wait there for a moment.
I'm sorry to have to tell everyone that we learned earlier on today that one of the members of the Inquiry team has been tested positive for COVID-19, and, as a result, a number of members of the Inquiry team and support staff are going to have to go into self-isolation for a couple of weeks.
Now, in the ordinary way, we might hope to continue notwithstanding that hiccup, but unfortunately the reduction in staff numbers, and most importantly the reduction in support staff, makes that, I'm afraid, impossible.
We have considered very carefully whether there is any way in which we could carry on, on some revised basis, but I'm afraid we've come to the conclusion that that simply is not possible.
So, regrettably, at this point we're going to have to close the hearings for the time being. We shall not be able to sit tomorrow -- Mr Burnley, I'll talk to you about that in a moment -- and we shall not be able to sit next week. So that means that we're going to have to close down the Inquiry, at least as far as hearings are concerned, until 11 January, when we shall resume.
December 9, 2020

Grenfell Tower Inquiry

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Day 85

Grenfell Inquiry
December 9, 2020

Deciding whether the fire spread more horizontally or vertically. This is crucial for understanding the scale and behavior of the fire.

**Horizontal Spread**

- **Indication:** The fire spread horizontally from one floor to another.
- **Evidence:** The flames and smoke traveled horizontally.
- **Impact:** Horizontal spread can affect the entire building, leading to widespread damage.

**Vertical Spread**

- **Indication:** The fire spread vertically through the building.
- **Evidence:** The flames and smoke traveled upwards.
- **Impact:** Vertical spread can lead to a faster and more severe fire, impacting multiple floors.

**Further Analysis**

- **Additional Evidence:** Video footage, witness statements, and expert testimony.

**Recommendations**

- Increase fire resistance in building materials.
- Improve fire containment practices.
- Regular maintenance of fire prevention systems.

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**Inquiry Day 85**

December 9, 2020

Grenfell Tower Inquiry
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