

<p>1 Friday, 19 September 2014                  2 (9.30 am)                  3 MR ANDREW COLLINS (continued)                  4 Questions from MS GERRY (continued)                  5 MS GERRY: Good morning, Mr Collins. Can I just check again                  6 what you have in front of you before we start. Do you                  7 have core bundle 1 in front of you?                  8 <b>A. Yes.</b>                  9 Q. And do you have your exhibits to your witness statement?                  10 <b>A. Yes.</b>                  11 Q. Mr Collins, yesterday I was asking you some questions                  12 about the reference to attempts being made, several                  13 attempts by local authorities had been made to impose                  14 armed guards on project locations.                  15 What I want to do first thing this morning is just                  16 have a look at the way in which Algerian law sets out                  17 how facilities such as In Amenas are to be protected, as                  18 between the managers and owners of sites and the                  19 Algerian authorities.                  20 Would you agree first of all that there is a joint                  21 responsibility between those who own and run facilities                  22 such as In Amenas and the country in which they are                  23 situated to ensure protection of the site and those                  24 working there?                  25 <b>A. Not exactly. The reason I say that is because the</b>                  Page 1</p>	<p>1 I understand the structure to be. So turning first in                  2 the first tab, if you turn over, I am afraid these pages                  3 probably aren't tabulated, if we go to the second page                  4 which is the contents page.                  5 <b>A. Yes.</b>                  6 Q. And we have at the top, this is:                  7 "Ruling no. 95-24 of 30 Rabie Ethani 1416                  8 corresponding to 25 September 1995 relating to the                  9 protection of public property and safety of persons                  10 associated with it."                  11 There are a another couple of rulings contained in                  12 this document but they don't appear to me to be                  13 relevant. It is that first one, so ruling 95-24.                  14 So that is what the ruling is. If we then turn over                  15 the page there is the detail of the ruling itself and if                  16 you look at the bottom left-hand side you see the                  17 Chapter 1, general provisions. And it states,                  18 article 1:                  19 "...- This ruling determines the general rules for                  20 the protection of public property and safety of persons                  21 associated with it.                  22 "Article 2 - Under this ruling, public property                  23 refers to infrastructure, installations, structures and                  24 resources, movable and immovable assets used for the                  25 administrative, economic, social, cultural, educative,                  Page 3</p>
<p>1 <b>structure for security for a site such as a hydrocarbon</b>                  2 <b>site or a site which is classified as part of critical</b>                  3 <b>national infrastructure, has to submit an internal</b>                  4 <b>security plan to the Wali and the Wali is the governor</b>                  5 <b>of the Wilaya and the Wali has a security commission</b>                  6 <b>which reviews it and agrees that.</b>                  7 <b>The person that has to convoy that to the Wali is</b>                  8 <b>the general manager of the site. That's my</b>                  9 <b>understanding and that is Sonatrach.</b>                  10 Q. Just to be clear, by manager or owner of the site                  11 I probably mean in the case of In Amenas the general                  12 manager of the JOC.                  13 <b>A. Okay, okay.</b>                  14 Q. Can we then just look, because I think this is set out                  15 in the rulings which we have been provided with and you                  16 will find them behind tab 26 in core bundle 1.                  17 <b>A. 26? Mine goes to 25.</b>                  18 Q. It was added in late.                  19 <b>A. Okay.</b>                  20 Q. Do you have that?                  21 <b>A. Yes.</b>                  22 Q. There are here, as I understand it, three rulings that                  23 have been made which concern protection of public                  24 property and safety of persons associated with it.                  25 If I can just briefly take you through what                  Page 2</p>	<p>1 sportive and religious activities."                  2 Do you agree that this is a ruling which would have                  3 had an effect on In Amenas?                  4 <b>A. Obviously I'm not a legal person so, you know, I am just</b>                  5 <b>looking at this for the first time, but on the face of</b>                  6 <b>it, yes.</b>                  7 Q. It was obviously -- I asked for the relevant legislation                  8 that was referred to in exhibits exhibited to your                  9 witness statement and this is what I was provided with                  10 which is why I am going through it with yourself.                  11 As we move through if you disagree that this applies                  12 then you can obviously say. So article 3:                  13 "Assets related to public property as defined under                  14 Article 2 above, irrespective of the legal regime                  15 governing them, are considered as homogenous functional                  16 units described below as the term 'establishment'. "                  17 So that is just to deal with the definitions and                  18 what this ruling applies to.                  19 Then moving down to Chapter 2 which is the                  20 accountability and responsibilities part. Article 8:                  21 "The head of establishment is directly responsible                  22 for the protection of the establishment. In this                  23 regard, he may take the assistance of qualified                  24 employees and set up an organic structure in charge of                  25 the internal safety of the establishment."                  Page 4</p>

<p>1 Then Article 9:                  2 "This responsibility is exercised within the                  3 establishment, for which he is responsible, as well as                  4 its outbuildings and immediate surroundings as                  5 stipulated in the internal safety plan of the                  6 establishment."                  7 Article 10:                  8 "The head of the establishment exercises his                  9 official authority on the entire staff involved in the                  10 safety operations within his establishment."                  11 Article 11:                  12 "The direct responsibility of the head of the                  13 establishment does not exempt the higher authorities and                  14 those that are accountable to them, particularly in                  15 terms of assistance, coordination, control and                  16 evaluation of the measures approved."                  17 Article 12:                  18 "Notwithstanding the provisions of this ruling the                  19 protection of the public property remains within the                  20 field of competence of general responsibility of the                  21 public safety departments. Furthermore, the latter may                  22 be solicited by the establishments to provide their                  23 assistance for internal safety."                  24 And 13:                  25 "The head of the establishment is liable to</p> <p style="text-align: center;">Page 5</p>	<p>1 measures, including the constitution of appropriate                  2 safety units in order to protect them."                  3 It then goes on to deal with the budget to say the                  4 state must include in its budget provision for                  5 protection of local municipalities.                  6 Then moving on to 18, 19, 20 and 21. 18:                  7 "If required, the head of the establishment may                  8 request the assistance of qualified external persons,                  9 particularly those from public safety departments."                  10 Article 19:                  11 "The staff in charge of the protection of the                  12 establishment is provided with measures suitable for the                  13 task. If required, they may be provided with arms,                  14 uniforms or distinctive visible signs under conditions                  15 set out through regulations."                  16 Article 20:                  17 "The recruitment, training and use of internal                  18 safety staff appointed for the protection of the                  19 establishment is carried out pursuant to the existing                  20 laws."                  21 21:                  22 "Notwithstanding the provisions of Article 16 above                  23 [which is in relation to the budget], the supervisory                  24 authority and the higher authorities are liable to                  25 provide their logistic support when the resources of the</p> <p style="text-align: center;">Page 7</p>
<p>1 implement all the existing legal and statutory                  2 provisions and measures for the protection of assets and                  3 safety of persons."                  4 This appears to me to provide a joint responsibility                  5 in terms of the head of the establishment is responsible                  6 for the internal safety of the establishment and that                  7 includes the outbuildings and the immediate surroundings                  8 but that that does not exempt the Algerian authorities                  9 from their responsibilities and in particular for them                  10 to provide assistance for coordination and control as                  11 requested.                  12 So there is this responsibility that is shared                  13 between the head of the establishment and the Algerian                  14 authorities. Does that accord with your understanding                  15 of how things were in In Amenas?                  16 <b>A. Broadly speaking, yes.</b>                  17 Q. So moving forward. The methods of protection are then                  18 dealt with in chapter 3. Moving down to article 15, so                  19 hopefully you are still on page 4 and following me?                  20 <b>A. Yes.</b>                  21 Q. Article 15:                  22 "Large infrastructure, structures, public equipment,                  23 highly sensitive economic and industrial units, subject                  24 to threats of sabotage, specifically due to their                  25 geographical distance, may be subject to special safety</p> <p style="text-align: center;">Page 6</p>	<p>1 establishment are insufficient to ensure its internal                  2 safety and protection."                  3 So again there is a cooperation between the                  4 authorities and the head of the establishment.                  5 <b>THE CORONER: Have you ever looked at these?</b>                  6 <b>A. I have never seen these before.</b>                  7 <b>MS GERRY: Moving down to the part that you have some</b>                  8 <b>knowledge of, chapter 4. Article 25, this is the</b>                  9 <b>control and sanctions:</b>                  10 "The Wali, assisted by the safety department heads,                  11 ensures for all the establishments set up within his                  12 Wilaya, the application of and compliance with the                  13 measures formulated in terms of safety and security. He                  14 may propose additional measures required by the                  15 circumstances."                  16 So as your understanding was there was a role for                  17 the Wali in working together with the establishment.                  18 Just before I move on to the second one, just to                  19 note at article 28 which is over the page, chapter 5:                  20 "The provisions of this ruling are extended to the                  21 private sector establishments which are operated in                  22 accordance with similar activities declared in Article 2                  23 above."                  24 So even if it is the case that the JOC may be seen                  25 to be a private sector establishment it would appear</p> <p style="text-align: center;">Page 8</p>

<p>1 this ruling would equally apply.                  2 Then if I move on to the second ruling which -- you                  3 have to go forward to tab 2.                  4 <b>A. Is that B?</b>                  5 Q. Yes, tab B. So it is 26B. This is a ruling, if we look                  6 at a second page it is the third decree that I suggest                  7 is the relevant one here:                  8 "Executive Decree No. 96-159 of 16 Dhou El Hidja                  9 1416 --                  10 <b>A. Sorry, you have lost me, I'm on page 3.</b>                  11 Q. So go down to "Decrees" in the middle. There should                  12 be --                  13 <b>A. "Decrees" in the middle. And then it says Article 1,</b>                  14 <b>article --</b>                  15 Q. Go down. You have Presidential Decree number 96-156.                  16 Below that 157 and below that 158?                  17 <b>A. Right, okay.</b>                  18 Q. Sorry. So this is a decree setting the conditions for                  19 application of provision of workplace internal security                  20 stipulated, and then it refers back to the one we have                  21 just been looking at. And in particular what I would                  22 like to look at in this decree is what the purpose of                  23 internal workplace security is and what can and cannot                  24 be afforded.                  25 If you move forward to where we get the actual                  Page 9</p>	<p>1 "The internal workplace security regulations and                  2 plan are prepared by the manager in connection with the                  3 authorised authorities".                  4 Again, I think that is your understanding, it is                  5 a collaborative process?                  6 <b>A. Yes.</b>                  7 Q. Article 5:                  8 "The internal security plan determines the scope of                  9 intervention of internal security and assesses the                  10 various risks and threats to which the workplace is                  11 exposed."                  12 Just moving down, if you turn over the page, again,                  13 we have the specific:                  14 "The Wali [district administrator], after obtaining                  15 the opinion of the security commission of the Wilaya                  16 [district], approves the internal security plans and                  17 regulations which are submitted to him or, otherwise,                  18 shares his observations, reservations and amendments to                  19 the workplace managers and requests them to carry out                  20 the modifications deemed necessary.                  21 "The internal workplace security plan and                  22 regulations are considered approved if the Wali                  23 [district administrator] does not expressly make his                  24 objection known at the end of a period of two (2) months                  25 after the date of their filing."                  Page 11</p>
<p>1 articles in chapter 1, which is three pages forward --                  2 no, more than that. It is page 6 at the top left if you                  3 find that.                  4 <b>A. Yes.</b>                  5 Q. So do you see where it says "Decrees" in bold on the                  6 left-hand side? Article 1:                  7 "The present decree has the purpose of determining                  8 the terms and conditions for organising and carrying out                  9 the activities of internal workplace security."                  10 Then it refers back to the rule we were just looking                  11 at concerning the protection of public assets and the                  12 safety of persons committed to them.                  13 Looking then at the purpose of this decree,                  14 Article 3, if you look at the top of the right-hand                  15 column:                  16 "...- protecting the infrastructure, facilities and                  17 the normal progression of professional activities at                  18 workplaces against any action with an illegal or                  19 criminal impact.                  20 " - thwarting any attempt at extraction, sabotage                  21 aggression or subversive disruption targeting the                  22 infrastructures, facilities, personnel et cetera."                  23 And then it goes on in chapter 2:                  24 "Internal security plan and regulations.                  25 Article 4:                  Page 10</p>	<p>1 And then moving over -- just pausing there. So                  2 where in your statement you quote the comment about                  3 several attempts have been made to impose civilian                  4 guards? I asked you yesterday who the authorities were.                  5 Could it have been it was the Wali?                  6 <b>A. No.</b>                  7 Q. Why not?                  8 <b>A. Because that would have been highlighted to us because</b>                  9 <b>that -- people were very clear, if the Wali and the</b>                  10 <b>security commission as it was described in a similar</b>                  11 <b>description here, then, you know, that's the direction</b>                  12 <b>that must be taken. My understanding is it did not come</b>                  13 <b>from the Wali. It came from, and I can't remember</b>                  14 <b>because there was a huge amount of correspondence at the</b>                  15 <b>time but it didn't come from the Wali. If it had come</b>                  16 <b>from the Wali that would have escalated it to</b>                  17 <b>a different level.</b>                  18 Q. Maybe somebody can find out who did make the request and                  19 on what basis.                  20 Moving on then to chapter 3, "Scope of the                  21 intervention":                  22 "The prerogatives of internal security are exercised                  23 within the limits of the workplace and can be extended                  24 to its approaches and to the areas and services in the                  25 immediate vicinity that are dependent on it.                  Page 12</p>

<p>1 "Approaches means the spaces adjacent to the 2 enclosure of the workplace and from which an attack 3 against the said workplace may be perpetrated. 4 "The areas and services in the immediate vicinity 5 include the roads and paths, the spaces, the routes, the 6 infrastructures and the outbuildings regularly operated, 7 utilised or borrowed by the workplace or by its 8 personnel, users, suppliers, partners or visitors". 9 So here the manager of the establishment being 10 responsible for the internal security includes here 11 spaces adjacent to the enclosure of the workplace, the 12 immediate vicinity, roads, paths, spaces routes 13 et cetera. Do you see that paragraph? 14 <b>A. Yes.</b> 15 Q. Is that what you agreed with? Would you agree that the 16 JOC were responsible in terms of being responsible for 17 the internal security, they were responsible as well for 18 the roads, paths, spaces and routes? 19 <b>A. Yes, along with the Sonatrach general manager as the 20 head.</b> 21 Q. I was very clear to say the JOC. 22 <b>A. Yes.</b> 23 Q. Moving down to chapter 4, second paragraph in article 9: 24 "In his capacity as director of internal security, 25 the manager of the workplace has direct authority over Page 13</p>	<p>1 Article 11: 2 "Without prejudice to the directives cited by the 3 hierarchical or supervisory authorities, the workplace 4 manager, according to the assessment of the threats and 5 risks incurred or foreseeable, on the one hand and on 6 the other hand, taking into account the characteristics 7 of the workplace decides: 8 "either to appoint an internal security assistant 9 from among the managing executives of the workplace, or 10 to recruit him from among the applicants showing proof 11 of training commensurate with the position. 12 "or to create, put in place and operate an organic, 13 permanent internal security department. 14 "or to entrust the internal security tasks, after 15 their prior initiation, to suitable personnel of the 16 workplace, namely in the case of small workplaces or 17 those exposed to risks at the level of the ordinary 18 staff. 19 "or to resort to specialised services of monitoring 20 and security with enterprises approved by the State. 21 "Recourse to specialised security services can take 22 place on an occasional or permanent basis or to enhance 23 the workplace's own security activities and measures." 24 Essentially what this is saying is that you have the 25 power, you have an obligation to provide internal Page 15</p>
<p>1 all of the activities, measures and means supporting 2 this." 3 Article 10: 4 "The workplace manager ensures the continuity and 5 performance of the activities of internal security." 6 Below that: 7 "In all cases he is obligated to ensure the internal 8 security of the workplace placed under his management 9 and the implementation of the measures and means adapted 10 to its characteristics and suitable to protect, in all 11 circumstances, its integrity and operation. 12 "According to the assessment of the risks and 13 threats to which the workplace is exposed, its extent, 14 the vulnerability associated with its location, the 15 intrinsic sensitivity and the central nature of its 16 activities, the size of its means and resources, the 17 workplace manager determines the system of regulations 18 and the framework and establishes the terms and 19 conditions for carrying out the missions of internal 20 security, possibly after obtaining the opinion of the 21 workplace's deliberating or consultative bodies 22 concerned." 23 So again, it is very clear that it is the 24 obligations on the internal -- it is on the manager in 25 terms of the internal security of the workplace. Page 14</p>	<p>1 security and there are a number of ways you can do it. 2 As I understand it, the JOC, it was done initially by a 3 contract team with Sterling which then became AFMC; is 4 that right? 5 <b>A. Sorry, what's your question?</b> 6 Q. We have here the ways in which the workplace manager can 7 deal with the -- his obligation under internal security 8 and the ability to appoint or create specialised 9 services within the workplace and my understanding is 10 that in order to comply with this how the JOC approached 11 things was to contract first with Sterling and then with 12 AFMC? 13 <b>A. Okay, yes, I follow your explanation, yes.</b> 14 Q. I know this is legal jargon. I am trying to translate 15 as I go through. 16 There is then the ability at 13 and 14 that if there 17 is more than one -- essentially contracts within the 18 same area, then you can have an associated internal 19 security department. As I understand it with the JOC 20 you had other contractors who weren't part of the JOC, 21 who had their own security guards? 22 <b>A. No, no. You said there were other contractors that were 23 not part of the JOC? The JOC is the management body for 24 the JV in the entirety.</b> 25 Q. Sure. It is clumsy wording. You had other contractors Page 16</p>

<p>1 there who weren't Statoil or BP. So you had the JGC 2 contractors there? 3 <b>A. Well, the contractors were all contracted to the JV 4 across the three partners.</b> 5 Q. And the security was coordinated amongst all of them? 6 <b>A. Yes.</b> 7 Q. I then want to skip forward to page 9 which deals with 8 the carrying and use of weapons. It is 9 in the top 9 right-hand corner. Sorry, this isn't paginated. It 10 starts with Article 26. Are you there, Mr Collins? 11 <b>A. Yes, I am.</b> 12 Q. Article 26 in essence states that the workplace can be 13 provided with weapons. So providing a workplace with 14 weapons and regulated professional equipment subject to 15 prior authorisation from the territory or competent 16 Wali, within the limits of the typical allocations 17 described by the Minister of Interior. The workplace 18 purchases the weapons and equipment concerned by the 19 authorisation under the conditions provided by the 20 regulations in force. 21 So had you decided that you wanted to have an armed 22 civilian guard you could have applied for authorisation 23 for weapons? 24 <b>A. Yes, I follow.</b> 25 Q. The cost is dealt with in paragraph 4 and that is to be Page 17</p>	<p>1 made to impose armed guards on project locations. This 2 has been judged as unacceptable on the grounds of 3 ethical issues." 4 The question I have asked to be looked into is who 5 were those local authorities and what were the attempts 6 made and why. 7 THE CORONER: So just whether it is possible to find out any 8 more detail about that. Mr Popat, would it be? 9 MR POPAT: Sir, the document that has been referred to is 10 the security management plan which was looked at in some 11 detail, drafted by the liaison team. 12 THE CORONER: Yes. 13 MR POPAT: I anticipate, I can't be certain but I anticipate 14 the authors of the report will be giving evidence before 15 us. 16 THE CORONER: So the starting point will probably be with 17 them. 18 MR POPAT: Yes. 19 THE CORONER: Shall we do that and see how we get on with 20 them? 21 MR POPAT: If we can make any other enquiries we will. 22 THE CORONER: Thank you very much. I am very grateful. 23 MS GERRY: Mr Collins, my time is short so in relation to 24 the third regulation. Can I just ask you this: were you 25 aware that there was an inter institutional security Page 19</p>
<p>1 borne by the workplace. Then chapter 8, keeping and 2 carrying use of weapons. 3 Article 32: 4 "The conditions for keeping and carrying the weapons 5 professional equipment that the workplace is authorised 6 to hold in connection with its internal security are 7 those promulgated by the laws and regulations in force." 8 And goes on to deal with use of weapons, last 9 resort. So there is provision, isn't there, for weapons 10 to be -- 11 <b>A. Sorry what was the last thing you said?</b> 12 Q. Sorry, I did go rather quickly. So article 32, 33 and 13 34 deals with the use of weapons and that they are only 14 to be used as a last resort. With armed aggression 15 et cetera? 16 THE CORONER: That is what it says anyway. 17 <b>A. All right, found it.</b> 18 THE CORONER: Can I just ask, you mentioned -- you said that 19 somebody might make an enquiry. So we don't lose that 20 because I suspect if we are not careful no one will. 21 Can you articulate what it is and who you would like to 22 do it so we don't lose it? 23 MR POPAT: So at paragraph 39 there is a quote from the 24 security management plan which says: 25 "Several attempts by local authorities have been Page 18</p>	<p>1 committee set up? 2 <b>A. No because I actually don't know what that means.</b> 3 Q. If you don't I am not going to take the time. 4 <b>A. Okay.</b> 5 Q. So, Mr Collins, you would agree that there is a degree 6 of cooperation and joint responsibility between the 7 manager, the JOC of In Amenas and the local authorities 8 to protect the In Amenas site? 9 <b>A. Yes, but the -- it has always been clear that the senior 10 Sonatrach person is the -- takes the ultimate 11 accountability and has that discussion and dialogue with 12 the Wali. It's clear that that's always been the case, 13 that the senior Sonatrach person takes the lead amongst 14 the equals but, you know, in reality that person would 15 talk to his peers in the JV.</b> 16 Q. And if there was a need for further resources or for 17 a request for armed civilian guards there was a process 18 that could be gone through and the authorities could be 19 asked, that is right, isn't it? 20 <b>A. It looks like it from this, yes.</b> 21 Q. Can I then just move on, just two more -- three more 22 matters very briefly. Firstly, just in relation to the 23 cost of the strike. You were asked by my learned friend 24 Mr Ritchie yesterday about the effect of the strike on 25 the business of the JOC. Can I just ask you to turn up Page 20</p>

5 (Pages 17 to 20)

<p>1 page 105 of your exhibits. This is a CdG document 2 from September 2012. If I can ask you to go to 105, the 3 final paragraph says this: 4 "The enduring strike undertaken by the BAAT 5 personnel (drivers/technical staff) is significantly 6 impacting the operations of the In Amenas licence. The 7 strike is generating rig standby costs and caused the 8 cancellation of the planned fracking campaign. In 9 addition to this additional financial cost production 10 losses will be experienced over the next years which 11 will have a detrimental effect on the association's 12 effort to maintain plateau production. The CdG 13 expresses its significant concern and it is inviting 14 Sonatrach to take all necessary measures to resolve this 15 issue and protect the interests of the association. 16 Moreover the CdG has expressed its concerns in relation 17 to the rising HSE risks inherent in the transportation 18 system." 19 You go on to deal with concerns about that. 20 So it is right, isn't it, that the enduring strike 21 was having -- it was significantly impacting on the 22 operations of the In Amenas site? 23 <b>A. I'm sorry, the 105 I've got is the JV security plan. It</b> 24 <b>looks like that (indicated) and it hasn't got any of</b> 25 <b>those words you just told me, sorry. It says 105 at the</b> Page 21</p>	<p>1 <b>A. Yes.</b> 2 Q. So that process started on the 23rd or around the end 3 of September; is that right? 4 <b>A. Yes.</b> 5 Q. There you say you would be demobilising nonessential 6 expats, yes? 7 <b>A. Yes.</b> 8 Q. It is right to say, isn't it, a distinction was made 9 between essential and nonessential expats? 10 <b>A. Yes.</b> 11 Q. When we move forward to December, in mid December 12 I think it was, according to your evidence, the 13 agreement was reached with the drivers that they would 14 cease their strike for four months; is that right? 15 <b>A. That's right. That's what I was told, yes.</b> 16 Q. And in your evidence as well you said the strike had 17 ebbed and flowed? 18 <b>A. Yes, when I was talking to Mr Underwood yesterday I was</b> 19 <b>trying to describe how there would be a time when the</b> 20 <b>strike looked like it was going to be resolved and then</b> 21 <b>that time would come and it would not be resolved. So</b> 22 <b>that's what I was trying to explain.</b> 23 Q. There were occasions that you knew about, weren't there, 24 when the drivers were saying "yes we're happy to the 25 resolve it and go back to work", and then they changed Page 23</p>
<p>1 <b>bottom but it is a different one.</b> 2 THE CORONER: We will get you a copy. 3 MS GERRY: It is not your fault, Mr Collins. 4 <b>A. I apologise for that.</b> 5 THE CORONER: Not at all. 6 MR POPAT: If it helps it is quoted in Mr Collins's 7 statement at paragraph 67. 8 <b>A. Sorry, got it. That is the weekly summary of risks.</b> 9 MS GERRY: Mr Collins, it is a simple statement. You were 10 trying to articulate yesterday whether or not there was 11 an impact of the strike. Looking at that document it is 12 right to say that in September 2012 it was the case that 13 there was concerns being raised about significant impact 14 of the drivers strike on the operations on In Amenas. 15 <b>A. Yes, that's right.</b> 16 Q. Can I then just look at demanning of the site and if you 17 have your witness statement in front of you, 18 paragraph 68. You mentioned there halfway down that 19 paragraph: 20 "On 23 September 2012 Tore Bech ... explaining that 21 as the strike was unlikely to be resolved by the end of 22 the month, and thus transport was likely to be 23 problematic going forward, the JV would start the 24 demobilisation of nonessential expats." 25 Do you see that? Page 22</p>	<p>1 their minds? 2 <b>A. That was what I was being told, yes.</b> 3 Q. And exactly that happened, didn't it, over the Christmas 4 period because we heard from Mr Cobb how he was 5 contacted over the Christmas period to say the new batch 6 of drivers coming on duty are now saying they are not 7 going to abide by the agreement which had been reached 8 by the previous batch and again they were threatening to 9 go on strike? 10 <b>A. I think the difference, there is a subtle difference and</b> 11 <b>the difference in the middle of December was that the</b> 12 <b>strike was declared over. Whereas in the previous ebbs</b> 13 <b>and flows it was never declared that the strike was</b> 14 <b>over. In the middle of December the groups seemed to</b> 15 <b>reach some type of resolution and that seemed to be</b> 16 <b>different, that's how it felt to me as it was</b> 17 <b>communicated, to the way the previous sort of</b> 18 <b>expectations and then, you know, not being met. It felt</b> 19 <b>different, and as the members, the JOC members</b> 20 <b>communicated to Statoil and to me and no doubt into</b> 21 <b>Sonatrach it felt different to the previous situations.</b> 22 Q. You agree this was around mid December, is that right? 23 <b>A. Yes, it was.</b> 24 Q. You say then there was a risk assessment conducted 25 before you decided to reman? Page 24</p>

6 (Pages 21 to 24)

<p>1 <b>A. The JV informed me that that's what they were doing,</b> 2 <b>yes.</b></p> <p>3 Q. Do you know who conducted that risk assessment?</p> <p>4 <b>A. My recollection was that Mark, Tore and Lotfi pulled</b> 5 <b>together all of their management departmental managers</b> 6 <b>and started to conduct a risk assessment exercise for</b> 7 <b>remobilising people who had been demobilised. Yes</b> 8 <b>that's my understanding.</b></p> <p>9 Q. When was that risk assessment completed?</p> <p>10 <b>A. I don't know. That was something that was done inside</b> 11 <b>the JOB of the JV. I don't know exactly.</b></p> <p>12 Q. So this was a risk assessment that was started some time 13 around the middle of December. You obviously had the 14 Christmas period. Yet by the beginning of January you 15 already had a number of expats returning to In Amenas?</p> <p>16 <b>A. That's correct, yes.</b></p> <p>17 Q. Does that seem to you to be quite a quick process?</p> <p>18 <b>A. No.</b></p> <p>19 Q. In terms of assessing who should return first when you 20 demobilised you obviously first demobilised nonessential 21 expats. When you remobilised did you first remobilise 22 essential expats?</p> <p>23 <b>A. The JV had their own remobilisation plan which had to be</b> 24 <b>phased and tied in with the crew change capability. In</b> 25 <b>other words, the aircraft and the transport and the</b></p> <p style="text-align: center;">Page 25</p>	<p>1 <b>development needs for the graduates and they assess</b> 2 <b>what's the right thing to do. They look to the</b> 3 <b>businesses to say if there are opportunities and there</b> 4 <b>is a group that match those needs together. In Amenas</b> 5 <b>was a secure place to go to and so it was, you know,</b> 6 <b>that was a good fit for Sebastian and the process</b> 7 <b>proceeded.</b></p> <p>8 Q. Let's just consider the statement. It is a secure place 9 to go to. In Amenas was located in an area where the 10 FCO had said essential travel only. It is an area where 11 there is known terrorism. It is an area whereby to move 12 around, to get from the airport to the site you needed 13 an armed guard. It is an area that had a curfew when 14 you were on site. It is an area that if you left site 15 you needed an armed guard. It is an area in a military 16 controlled zone with Gendarmes looking after the 17 perimeter. That may be a secure site in your mind in 18 one way but it is a high, high risk area. If you 19 consider it compared to Scotland, Norway, another 20 overseas posting it is a high risk area, isn't it?</p> <p>21 <b>A. The -- no. The FCO advice did not say you should not</b> 22 <b>travel to that area. It just said all but essential</b> 23 <b>travel, which is sort of typically to try to deter</b> 24 <b>people who are not being -- travelling there without,</b> 25 <b>you know, the benefit of safeguards and mitigations and</b></p> <p style="text-align: center;">Page 27</p>
<p>1 <b>ability of the Gendarme to provide the convoys. So all</b> 2 <b>of that required a lot of planning. So it would have</b> 3 <b>been a gradual process that they would have developed</b> 4 <b>and it would have been a gradual -- that would have been</b> 5 <b>a gradual process.</b></p> <p>6 <b>But that was something that was done inside the JV</b> 7 <b>so the JV were managing that.</b></p> <p>8 Q. In terms of Sebastian John, as we have heard, he had 9 recently become a BP employee. He was allocated -- he 10 was part of the graduate Challenger programme. He 11 received his visa, I believe it was around December 12 time. It was only just before Christmas that he was 13 told he was going to be sent to In Amenas. So he was 14 actually told he was going to In Amenas at a point in 15 time when you hadn't even completed the risk assessment?</p> <p>16 <b>A. I don't know the timing, but Sebastian didn't mobilise</b> 17 <b>before the Christmas and New Year period is my</b> 18 <b>understanding.</b></p> <p>19 Q. He left the UK on 9 January?</p> <p>20 <b>A. Yes. I don't know. I'm sure that's correct.</b></p> <p>21 Q. In terms of allocating new employees to overseas sites, 22 is any consideration given to the experience of those 23 who you are sending to overseas sites?</p> <p>24 <b>A. The deployment, the allocation, the sending of a person</b> 25 <b>to a site, there's a group of people that look at the</b></p> <p style="text-align: center;">Page 26</p>	<p>1 <b>risk assessments. It's to try to discourage that type</b> 2 <b>of unaccompanied traveller. In the FCO advice they</b> 3 <b>never said do not travel to this area. It was all but</b> 4 <b>essential travel was the way they defined it.</b></p> <p>5 <b>So although it was saying the reality of Algeria is</b> 6 <b>this, it didn't say, do not travel there.</b></p> <p>7 Q. Can I just ask, you mentioned a department which 8 considered the allocation of people overseas. Can I ask 9 what that department is?</p> <p>10 <b>A. It is more of a committee of people rather than</b> 11 <b>a specific department with a department name. And</b> 12 <b>I don't know what that is.</b></p> <p>13 Q. We know -- well, it is exhibited to Mrs John's witness 14 statement whose evidence she is yet to give but we know 15 that Sebastian completed an intercultural pre programme 16 questionnaire which he completed before he went but as 17 Nicola understands it nothing very much happened to it. 18 There he is asked: 19 "Please indicate your international experience, 20 countries and amount of time purposed." 21 And Sebastian answered: 22 "I have never worked in a foreign country before. 23 However, I have been on holiday a number of times to 24 Africa, the Gambia, so I'm aware of how diverse 25 different cultures can be. Therefore while I have been</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 abroad to foreign cultures it has only been for 2 leisure."</p> <p>3 He is then asked about the responsibilities in the 4 country and he says:</p> <p>5 "I'm not 100 per cent sure about my work 6 responsibilities. I've yet to start with the company."</p> <p>7 So this is somebody who has virtually no real 8 experience of the company he has just been employed by. 9 Who has only ever travelled abroad on holidays and he 10 was sent in January 2013, in all the circumstances we 11 have been looking at surrounding In Amenas at that time, 12 to In Amenas. To be in a country where he was required 13 to have an armed guard to get from the airport to the 14 facility. Sebastian was somebody who didn't have the 15 experience and resources to be able to deal with the 16 sort of situation that he found himself in, 17 in January 2013?</p> <p>18 <b>A. That's right, but I think that the unprecedented and 19 sort of outrageous situation that happened was in the 20 extreme and so it was a horrific situation to be in. 21 But I would say that with Sebastian he was buddied with 22 people in the office before he mobilised, particularly 23 with two senior people who, one of which was the senior 24 engineering person who spent time with Sebastian, who 25 had been to In Amenas many times, explained to him what</b></p> <p style="text-align: center;">Page 29</p>	<p>1 vehicles as they were coming into the site. Do you 2 remember that?</p> <p>3 <b>A. I remember that, yes.</b></p> <p>4 Q. It was more than that though, wasn't it?</p> <p>5 <b>A. That's what I was told. I was told it was, the teething 6 problems were described to me as some complaints, 7 nothing formal, nothing written down but it was -- Mark 8 explained to me that some people had complained that 9 perhaps some of the daily inspections were not to the 10 same rigor as they had been.</b></p> <p>11 Q. Can I just read out to you the handover notes from Paul 12 Morgan to Anthony Fitzpatrick on 16 January 2013 and for 13 those who want to follow it this is the exhibit to Mike 14 Moore's exhibit 1617 and it is page 6. Can I just read 15 it to you to save time. It is entitled "SSI internal 16 security review":</p> <p>17 "The SSI have been mentioned exclusively in the 18 internal security review. Here is what has been 19 mentioned. The guards and internal security is now 20 owned and operated by Sonatrach ASI. Since the 21 inception of this change there have been a number of 22 events which have highlighted associated bedding in 23 problems. The military have complained twice about the 24 drop in levels of access control to the field and sites 25 and during the recent strikes civilians were allowed to</p> <p style="text-align: center;">Page 31</p>
<p>1 <b>In Amenas was and the second, if you like, mentor before 2 he went out had also actually worked at In Amenas. So 3 they did spend time with Sebastian so it wasn't a case 4 of Sebastian going to a place with no background or 5 opportunity to ask more questions.</b></p> <p>6 Q. We will, and we have heard already some evidence about 7 the extraordinary ability of some people to escape the 8 situation in In Amenas. They drew on I would suggest 9 a degree of ingenuity, experience and some on a detailed 10 layout of the site. Sebastian's ability to have any 11 chance in the circumstances at In Amenas was 12 significantly reduced given his inexperience and lack of 13 knowledge, wasn't it?</p> <p>14 <b>A. No, Sebastian had an induction. The induction was about 15 the -- would have given him a layout and understanding 16 of the site. It would have advised him what to do, what 17 the alarms were, so he was given advice about the site.</b></p> <p>18 Q. There is just one final matter -- I realise I have taken 19 up too much time -- it is very important. You were 20 asked about SSI and the teething problems in the 21 changeover. Your response from my recollection was that 22 the concerns that were reported to you -- so this is the 23 movement of the internal security guards to SSI, the 24 concerns were explained to you as about that they 25 weren't properly checking the roadworthiness of the</p> <p style="text-align: center;">Page 30</p>	<p>1 access the BdV despite clear instructions to stop them. 2 Indeed liaison/management were not even informed of 3 their presence. The recent industrial action in 4 In Amenas has been closed to all on site and the risk of 5 lapses in access control should not be viewed without 6 taking this into consideration."</p> <p>7 It goes on to say:</p> <p>8 "The drivers and strikers are close to the SSI team 9 and hail from the same town and villages."</p> <p>10 This would appear to be more than a concern about 11 checking roadworthiness of vehicles coming into the BdV?</p> <p>12 <b>A. The way you described, yes, it is more than that.</b></p> <p>13 Q. And that differs from your recollection of what you were 14 told?</p> <p>15 <b>A. That differs.</b></p> <p>16 MS GERRY: Thank you, I have no further questions. 17 Just one further thing. Are you able to assist with 18 whose Seb's buddies and mentors were?</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. Can you, sorry?</p> <p>21 <b>A. So that would be Mr Geoff Graham. I would say he was 22 the primary person looking after him. Also a person 23 who, he wasn't official but a person who established 24 a rapport was Mark Humphries, so Mr Geoff Graham was the 25 engineering manager for north Africa and Mark Humphries</b></p> <p style="text-align: center;">Page 32</p>

8 (Pages 29 to 32)



<p>1 <b>was the project manager, so between them they went --</b></p> <p>2 <b>when Sebastian was in the office, you know, they took</b></p> <p>3 <b>a sort of mentor role and particularly they liaised with</b></p> <p>4 <b>the people that were looking at Sebastian's development</b></p> <p>5 <b>and future.</b></p> <p>6 MS GERRY: Thank you.</p> <p>7 THE CORONER: Can you just help me, obviously even if</p> <p>8 someone has worked for you for a long time and then the</p> <p>9 first time they go to a site they won't be familiar with</p> <p>10 it by definition.</p> <p>11 <b>A. Yes.</b></p> <p>12 THE CORONER: Just in terms of learning a job is a site that</p> <p>13 has got significant security considerations, is that</p> <p>14 necessarily the best environment for somebody to be</p> <p>15 learning their job? It is just a question.</p> <p>16 <b>A. I mean you could -- I still think the technical aspects</b></p> <p>17 <b>that Sebastian was going to acquire and he was going in</b></p> <p>18 <b>to do a real job, I think he could still do that job in</b></p> <p>19 <b>that environment. I suppose you could debate it,</b></p> <p>20 <b>whether it was the ideal place to do that type of</b></p> <p>21 <b>development training and debate it yes and no.</b></p> <p>22 THE CORONER: All right, thank you.</p> <p>23 Questions from MS GOLLOP</p> <p>24 MS GOLLOP: My name is Katie Gollop, I represent Belinda</p> <p>25 Green, who is the widow of Stephen Green.</p> <p style="text-align: center;">Page 33</p>	<p>1 Q. And then if you just turn on to page 3 of that?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. And we have there a list of the deceased and their job</p> <p>4 descriptions. I would just like to run through some of</p> <p>5 those with you. So we have there Mr Stephen Green and</p> <p>6 he was, we are told, employed as a health and safety</p> <p>7 executive manager responsible for ensuring that the</p> <p>8 engineering, procurement and construction contractor</p> <p>9 JGC, which I think is the Japanese Gas Corporation, is</p> <p>10 that right?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. Effectively managed the health and safety risks</p> <p>13 associated with building new facilities on site.</p> <p>14 Just in terms of keeping production going, could</p> <p>15 Mr Stephen Green have been taken off-site without</p> <p>16 affecting production?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. Just following this same question through with a few of</p> <p>19 the deceased since their representatives aren't here</p> <p>20 today. Mr Whiteside was engaged by a subcontractor as</p> <p>21 a planning engineer responsible for ensuring new project</p> <p>22 activity was appropriately planned and scheduled. Could</p> <p>23 he have been taken off-site without affecting</p> <p>24 production?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 35</p>
<p>1 Mr Collins, I would like if I may just to start by</p> <p>2 picking up some questions that arose from your evidence</p> <p>3 yesterday. You told us that it would have been possible</p> <p>4 to fly out some of the expats working on site in an</p> <p>5 unscheduled way without affecting production. Do you</p> <p>6 remember that part of your evidence? It was some</p> <p>7 questions you were asked by Mr Ritchie and you were</p> <p>8 talking about people who were needed to actually keep</p> <p>9 the pipes flowing and people who were doing jobs</p> <p>10 separate to that?</p> <p>11 <b>A. Yes, it would be possible, but as long as the right</b></p> <p>12 <b>people and therefore capabilities were there. So it's</b></p> <p>13 <b>not something you could do at any time at the drop of</b></p> <p>14 <b>a hat. So it would depend on who was there, but I would</b></p> <p>15 <b>assert that you could probably do that.</b></p> <p>16 Q. I just want to follow that through in relation to the</p> <p>17 seven gentlemen who were there or at least some of them.</p> <p>18 Could I ask you to lay your hands on the witness</p> <p>19 statement bundle, volume 1 if you have that.</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. If you look at tab 10 which is Mr Stokely's witness</p> <p>22 statement, and turn over to the end of the witness</p> <p>23 statement you will see a front page for Operation OTUS</p> <p>24 that looks like that which is an internal document.</p> <p>25 <b>A. Yes front page, yes.</b></p> <p style="text-align: center;">Page 34</p>	<p>1 Q. Mr Bilsland, a subcontractor responsible for the</p> <p>2 inspection and testing of vessels and pipework to ensure</p> <p>3 mechanical integrity was maintained. Checking the welds</p> <p>4 and vessel wall thicknesses across the site and lead</p> <p>5 rope access specialist for working at heights. Could he</p> <p>6 have been taken off-site without affecting production?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. Over the page, Mr Barlow, responsible for supervision of</p> <p>9 local contractors in the construction of pipelines,</p> <p>10 flowlines, civil, mechanical and electrical</p> <p>11 infrastructure. The same question in relation to him?</p> <p>12 <b>A. Yes, from the way it's described.</b></p> <p>13 Q. I am going to assume that the same does not apply in</p> <p>14 relation to Mr Barlow who I assume you would have as</p> <p>15 a liaison officer have regarded as essential?</p> <p>16 <b>A. Mr Morgan you mean?</b></p> <p>17 Q. Yes, I did mean Mr Morgan, yes.</p> <p>18 <b>A. So you're saying, can you just repeat the question so</b></p> <p>19 <b>I can put it in --</b></p> <p>20 Q. I am assuming that his role as operation liaison</p> <p>21 supervisor and tell me if I'm right or wrong about this,</p> <p>22 but was so important that he couldn't have been taken</p> <p>23 off-site without affecting production, or could he?</p> <p>24 <b>A. Well, Paul obviously doesn't affect -- doesn't directly</b></p> <p>25 <b>run a production facility.</b></p> <p style="text-align: center;">Page 36</p>

<p>1 Q. No?</p> <p>2 <b>A. And nor does Garry, Sebastian and Stephen but they all</b></p> <p>3 <b>make up the organisation and in Paul's case Paul makes</b></p> <p>4 <b>up the organisation. If Paul would have been removed</b></p> <p>5 <b>from site, well, the expats would go as well because</b></p> <p>6 <b>Paul's role there as part of the liaison function is to</b></p> <p>7 <b>coordinate with the Gendarmes regarding expat movements.</b></p> <p>8 <b>So Paul would be likely to stay at the site unless the</b></p> <p>9 <b>expats left in which case he could leave.</b></p> <p>10 Q. Yes, thank you. You can put that file aside for the</p> <p>11 moment.</p> <p>12 Could I ask you just to pick up the orange file on</p> <p>13 the corner there. You were asked a moment ago by</p> <p>14 Ms Gerry about the Foreign Office advice. Let us just</p> <p>15 briefly remind ourselves of what that says. It is at</p> <p>16 tab 31. The first paragraph is talking about the Malian</p> <p>17 and Niger borders and the Mauretanian border and</p> <p>18 advising against all but essential travel to areas</p> <p>19 within what sounds to us on our small island as an</p> <p>20 astonishingly large distance of 450 kilometres by</p> <p>21 100 kilometres due to increasing threat of terrorism in</p> <p>22 southern Algeria and they advise against all but</p> <p>23 essential travel within 50 kilometres of the Libya and</p> <p>24 Tunisian borders and you were aware of that at the time?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 37</p>	<p>1 just agreed that the travel to the site in January 2013</p> <p>2 and that trip or at the end of 2012 made by</p> <p>3 Mr Stephen Green, Mr Whiteside, Mr Billsland and</p> <p>4 Mr Barlow, wasn't essential for production?</p> <p>5 <b>A. Not for production that day, but that Stephen and Garry</b></p> <p>6 <b>and the rest of the individuals you mentioned were part</b></p> <p>7 <b>of a project which was a project site based. It wasn't</b></p> <p>8 <b>about the production of a molecule of gas on that</b></p> <p>9 <b>particular day, but going forward those projects were</b></p> <p>10 <b>going to bring production to the facilities, so do you</b></p> <p>11 <b>see the --</b></p> <p>12 Q. Yes, I do. I understand. There is production and there</p> <p>13 are other functions. I understand that. Just to</p> <p>14 complete this, could you have a look at core exhibit</p> <p>15 volume 2?</p> <p>16 <b>A. Okay.</b></p> <p>17 Q. Do you have that?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. Could you have a look at tab 12 which is a letter from</p> <p>20 Mr Hague who I think was our then Foreign Secretary,</p> <p>21 in August of last year. On the second page of this</p> <p>22 letter he talks about travel advice to and by UK</p> <p>23 companies. And he says in the second paragraph, the</p> <p>24 paragraph in the middle of 516:</p> <p>25 "An update was made two days before the attack and</p> <p style="text-align: center;">Page 39</p>
<p>1 Q. And then over the page, an update in the south. Advise</p> <p>2 against all but essential travel to areas within</p> <p>3 50 kilometres of the Libyan/Tunisian borders.</p> <p>4 Terrorists involved in kidnaps. This is the liaison</p> <p>5 department and it is echoing the Foreign Office?</p> <p>6 <b>A. Okay, right, yes this is the liaison document.</b></p> <p>7 Q. So let's stick with page 276 for the moment. Tell me</p> <p>8 about your attitude to Foreign Office advice, did you</p> <p>9 think it was important?</p> <p>10 <b>A. Yes, so we monitor the FCO advice, the FCO will issue a</b></p> <p>11 <b>travel advisory periodically, as you can see here, and</b></p> <p>12 <b>they issued several after that, as I'm sure you know.</b></p> <p>13 <b>And obviously the reason why there was the Gendarmes</b></p> <p>14 <b>there and the escort duties and the liaison team who</b></p> <p>15 <b>liaised with the Gendarmes and organised the convoys and</b></p> <p>16 <b>escorts is entirely to, you know, offset the issues as</b></p> <p>17 <b>described in this document.</b></p> <p>18 <b>So we used to monitor this and see if there was</b></p> <p>19 <b>anything that changed, and it was in these documents</b></p> <p>20 <b>that they never said: do not travel to this area. They</b></p> <p>21 <b>say: exercise caution in these areas.</b></p> <p>22 <b>So --</b></p> <p>23 Q. Well, hang on a second because what it actually says is:</p> <p>24 "We advise against all but essential travel."</p> <p>25 If we focus on the word "essential" I think you have</p> <p style="text-align: center;">Page 38</p>	<p>1 that was a contextual change about French intervention</p> <p>2 in Mali."</p> <p>3 Were you aware of that change two days before the</p> <p>4 attack on In Amenas?</p> <p>5 <b>A. I was aware of the French intervention in Mali but</b></p> <p>6 <b>I wasn't -- I didn't see the FCO advice which came out</b></p> <p>7 <b>on 13 January. I hadn't seen that by the morning of</b></p> <p>8 <b>16 January.</b></p> <p>9 Q. Then if we turn over the page at the top of 517 he says:</p> <p>10 "We are also addressing the perception that travel</p> <p>11 advice is just for tourists and we are encouraging</p> <p>12 companies to use it to guide their security plan."</p> <p>13 You would say, would you, well, we did use it to</p> <p>14 guide our security planning. We were confident that we</p> <p>15 had the risk of a terrorist attack on In Amenas under</p> <p>16 control?</p> <p>17 <b>A. We did use it to guide our security planning, yes.</b></p> <p>18 Q. And you were confident that you had the risk of</p> <p>19 a terrorist attack on In Amenas totally under control?</p> <p>20 <b>A. At that time -- well it depends what type of terrorist</b></p> <p>21 <b>attack you mean.</b></p> <p>22 Q. I mean any kind. Was there any kind of terrorist attack</p> <p>23 that you felt you didn't have under control?</p> <p>24 <b>A. I would say under control of probable terrorist attacks,</b></p> <p>25 <b>yes.</b></p> <p style="text-align: center;">Page 40</p>

10 (Pages 37 to 40)

<p>1 Q. Probable terrorist attacks. We'll come back to that 2 phrase because "probable" was a word that you used 3 yesterday. 4 I want to ask you some questions and you can put 5 that file aside for the moment, about investigations 6 into what happened and what went wrong. 7 You were asked some questions about this by 8 Mr Ritchie yesterday. BP's stance throughout, as 9 I understand it, is that this enquiry is the best forum 10 for looking at what happened, learning lessons and 11 finding out what went wrong; is that right? 12 <b>A. I believe this is one of a number of -- I think there's</b> 13 <b>an Algerian investigation as well, so I would say this</b> 14 <b>is one of, is my understanding. You said the best,</b> 15 <b>I think it's --</b> 16 Q. We will come back to the Algerian investigation, about 17 which I must say I and my client know nothing, so we 18 would be grateful to be informed about that in a moment. 19 But BP has put its investigative attention and focus 20 into assisting this enquiry and process rather than 21 conducting its own enquiry and process; is that right? 22 <b>A. No, BP also worked with Statoil, the partner, in their</b> 23 <b>investigation as well.</b> 24 Q. But you have -- BP hasn't undertaken its own 25 investigation. There is no equivalent BP report in the Page 41</p>	<p>1 Q. Do you agree with its conclusions? 2 <b>A. Can you be more specific?</b> 3 Q. By all means. Let's have a look at it. I think we have 4 it conveniently in witness statement bundle volume 4 and 5 it is -- 6 MS DOLAN: It is in core bundle 2 at tab 8. 7 MS GOLLOP: We have it all in all sorts of places. 8 Let's go towards the end of it. Some of the main 9 observation section which starts on page 410 of this 10 bundle, 8.2, the bottom of that page, I am going to take 11 it that you are very familiar indeed with section 8 of 12 this report? 13 <b>A. I've read section 8 very well indeed. I have read it.</b> 14 Q. Right. 15 <b>A. But I don't mind taking time now with you.</b> 16 Q. No, absolutely. Section 8.2: 17 "Reliance on military prevention and protection." 18 It talks about the outer and inner security layers. 19 Obligations under Algerian law and it was the 20 combination of outer and inner security layers that was 21 supposed to offer protection against a terrorist attack. 22 And the different elements were there as parts of an 23 integrated system. 24 Then over the page: 25 "In practice, design of the inner security layer was Page 43</p>
<p>1 way that there is a Statoil report? 2 <b>A. That's correct.</b> 3 Q. And yesterday you told us that the reason for that was 4 that you felt that any investigation conducted by BP 5 would lack the reach of this sort of enquiry. That was 6 your phrase. It would lack the reach? 7 <b>A. Yes.</b> 8 Q. Do you think that the Statoil investigation lacked 9 reach? 10 <b>A. Yes.</b> 11 Q. In what way? 12 <b>A. I think when the Statoil investigation took place there</b> 13 <b>were more, probably more things that were still evolving</b> 14 <b>and people were discovering. The Statoil report</b> 15 <b>I believe came out about this time last year actually,</b> 16 <b>September, and so I feel that because, for example, this</b> 17 <b>process had not completed and the Algerian process is</b> 18 <b>still in progress, that it couldn't understand fully</b> 19 <b>everything to put a report together. However, I'm sure</b> 20 <b>in the report it says that there will be opportunities</b> 21 <b>to sort of take on future learnings. I'm sure it says</b> 22 <b>that somewhere, but I don't think it had the full set of</b> 23 <b>information it needed to.</b> 24 Q. Have you read the report? 25 <b>A. Yes.</b> Page 42</p>	<p>1 based on the assumption that the military would prevent 2 and protect the facility from armed attack." 3 Anything you disagree with so far? 4 <b>A. No.</b> 5 Q. Then it says: 6 "Statoil and the [JV] trusted that the army would 7 deter or detect and respond to any terrorist threat and 8 thus prevent it from getting close to In Amenas." 9 Agree? 10 <b>A. I agree.</b> 11 Q. And then we have the subheading "Failure of 12 imagination". And it says that the reliance on military 13 protection is understandable given the historic context 14 in Algeria and the fact that over the life of the 15 In Amenas project there had been no major security 16 incidents. And even during the violence of the 1990s 17 the authorities had managed to safeguard the oil and gas 18 installations in the south of the country. And it talks 19 about the strong economic incentives for the Algerian 20 military to protect this critical national 21 infrastructure. Agree with all of that? 22 <b>A. Yes.</b> 23 Q. All of this, says the report, "contributed to the JV 24 placing a high degree of trust in the military." 25 Agree? Page 44</p>

<p>1 <b>A. Yes.</b></p> <p>2 Q. And you personally didn't you, Mr Collins, placed</p> <p>3 a high degree of trust in the military?</p> <p>4 <b>A. Yes, but based on not just purely trust, it was based</b></p> <p>5 <b>around security professionals being able to convince me</b></p> <p>6 <b>and others, including Statoil, that the capability was</b></p> <p>7 <b>there in the militarised zone and obviously the</b></p> <p>8 <b>Gendarmes were there as well. So it wasn't --</b></p> <p>9 Q. We will come back to how those military chaps went about</p> <p>10 testing the assumption that the military would deter and</p> <p>11 detect and respond to any terrorist threat and prevent</p> <p>12 it from getting close to In Amenas. We will come back</p> <p>13 to that. But everybody working there placed</p> <p>14 a high degree of trust in the military, didn't they?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. And let's face it, you had no choice about that, did</p> <p>17 you? You wanted to extract the oil and gas from</p> <p>18 Algerian soil. You had no choice but to rely on that</p> <p>19 third party, namely the Algerian military?</p> <p>20 <b>A. As well as the Gendarmerie at the site.</b></p> <p>21 Q. But for the outer layer only the Algerian military could</p> <p>22 provide the outer layer of security protection?</p> <p>23 <b>A. Yes, the military because it's -- you know, Algeria</b></p> <p>24 <b>dictates, it's a sovereign state and it dictates the</b></p> <p>25 <b>sovereign security of its own territory.</b></p> <p style="text-align: center;">Page 45</p>	<p>1 <b>with that.</b></p> <p>2 THE CORONER: I think what this is talking about is</p> <p>3 something slightly different which is -- can you see if</p> <p>4 we just go to it:</p> <p>5 "The joint venture's ability to imagine or plan for</p> <p>6 a scenario where the outer security layers did not work</p> <p>7 as intended."</p> <p>8 I think it is getting at a slightly different point.</p> <p>9 I don't think it's saying, as it were, what were the</p> <p>10 reasons that caused you to trust the outer security</p> <p>11 layers. I think this is making a slightly different</p> <p>12 point which I think is what you are being asked about.</p> <p>13 MS GOLLOP: No, to be fair, sir, I am not sure that it is</p> <p>14 and I think Mr Collins and I were on the same wavelength</p> <p>15 there. Because of the very precise here distinction</p> <p>16 between the outer security layer, which is the military</p> <p>17 protection --</p> <p>18 THE CORONER: It says layers, doesn't it?</p> <p>19 MS GOLLOP: Yes, well I don't know what other -- it says</p> <p>20 "outer security layers". There is only really one outer</p> <p>21 security layer. This is the military, isn't it? And</p> <p>22 then your inner security layer is the Gendarme.</p> <p>23 THE CORONER: Is that how it was viewed or was it viewed as</p> <p>24 two outer layers, the military and then the Gendarmes?</p> <p>25 I think that's how we have mostly been proceeding but</p> <p style="text-align: center;">Page 47</p>
<p>1 Q. So you are lumped with that as it were?</p> <p>2 <b>A. Lumped with it. You mean?</b></p> <p>3 Q. You have to cede control of that part of the security</p> <p>4 operation to a third party which is completely outside</p> <p>5 your control, don't you?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. Thank you. Then I am just focusing on the second</p> <p>8 paragraph of 8.3. The second sentence:</p> <p>9 "The investigation team considers that it [and</p> <p>10 I think that pronoun relates back to the high degree of</p> <p>11 trust in the military] also stood in the way of the</p> <p>12 [JV's] ability to imagine or plan for a scenario where</p> <p>13 the outer security layers didn't work as intended."</p> <p>14 Do you agree with that?</p> <p>15 <b>A. No, I wouldn't because again the JV had the Gendarmerie</b></p> <p>16 <b>protecting the site, the facilities and the people. So</b></p> <p>17 <b>that was -- that guarding force was there patrolling the</b></p> <p>18 <b>zones and so I don't think it stood in the way of the</b></p> <p>19 <b>JV. I don't think the way it's written is fair because</b></p> <p>20 <b>the JV and the liaison team and the senior managers knew</b></p> <p>21 <b>that it was essential that the Gendarmerie were there</b></p> <p>22 <b>and did their patrols and that's why they liaised with</b></p> <p>23 <b>them and checked what they were doing and carried out</b></p> <p>24 <b>their observations and there was an SSI group. So</b></p> <p>25 <b>I don't think it's quite the way -- I don't quite agree</b></p> <p style="text-align: center;">Page 46</p>	<p>1 you may be right, Ms Gollop.</p> <p>2 MS DOLAN: At 385, where it describes what the report means</p> <p>3 by inner and outer security. Page 44 of the report.</p> <p>4 MS GOLLOP: Right, well there we are. Page 385. The outer</p> <p>5 security is said to comprise three layers.</p> <p>6 THE CORONER: All I'm saying is you two may be agreed but</p> <p>7 don't assume that I am agreeing.</p> <p>8 MS GOLLOP: No, thank you very much, sir, it doesn't do to</p> <p>9 assume. All muddled up with my layers.</p> <p>10 So the outer security layers, apparently there are</p> <p>11 three of them, border protection, military zone and then</p> <p>12 site zone, which includes the Gendarmes. So according</p> <p>13 to that, in fact the Gendarmes are part of the outer</p> <p>14 security layers?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. So what perhaps if we look at all of that going back to</p> <p>17 page 411, the authors might be saying and I understand</p> <p>18 we are going to have a witness to speak to this report,</p> <p>19 but I would like to think it would have been mulled over</p> <p>20 within the JV, perhaps a little, is that the high degree</p> <p>21 of trust in the military stood in the way of the JV's</p> <p>22 ability to imagine or plan for a scenario where the</p> <p>23 outer security layers didn't work as intended.</p> <p>24 Let us put it this way: you didn't have a plan, did</p> <p>25 you, for what happens if an armed terrorist in a car</p> <p style="text-align: center;">Page 48</p>

12 (Pages 45 to 48)

<p>1 rocks up at the gate?</p> <p>2 <b>A. So you are saying "me", so you mean the JV?</b></p> <p>3 Q. Well, you personally given the position that you held in</p> <p>4 your overview of north Africa but the JV, however you</p> <p>5 like to call it. What was the plan?</p> <p>6 <b>A. Well, again, I'm not a security expert so I don't know</b></p> <p>7 <b>what the precise plan was for the site if a vehicle</b></p> <p>8 <b>turns up at the gates. I don't know what the --</b></p> <p>9 Q. That is not the first time that you have said you are</p> <p>10 not a security expert. We got coming along</p> <p>11 a Mr Johnston and Mr Porter. Which of those two is a</p> <p>12 security expert?</p> <p>13 <b>A. Mr Porter is -- has a security specialist role.</b></p> <p>14 Q. Who would be the best person then working at BP to tell</p> <p>15 us what the security plan was for terrorists coming to</p> <p>16 the gate. Would it be Mr Shaw?</p> <p>17 <b>A. I would say the best person would be the liaison</b></p> <p>18 <b>supervisor at In Amenas. That would be the best person.</b></p> <p>19 Q. And within the JV to whom did he report?</p> <p>20 <b>A. The OLS reported to the -- had a double reporting,</b></p> <p>21 <b>reported to the Algerian liaison manager in</b></p> <p>22 <b>Hassi Messaoud and he reported to Mr Cobb at In Amenas.</b></p> <p>23 Q. But in default of going directly to liaison, whose job</p> <p>24 description it was, it would be Mr Porter talking at</p> <p>25 high level of management. He's the chap who is going to</p> <p style="text-align: center;">Page 49</p>	<p>1 "No military force can guarantee complete protection</p> <p>2 against determined terrorists for a licensed area the</p> <p>3 size of Luxembourg situated close to a porous border."</p> <p>4 Do you agree with that?</p> <p>5 <b>A. I don't know. A security expert would have to be able</b></p> <p>6 <b>to, you know, call a judgment on that. I couldn't --</b></p> <p>7 <b>I wouldn't know.</b></p> <p>8 Q. The next sentence:</p> <p>9 "The [JV] had incomplete information about the</p> <p>10 capabilities of the military providing the outer</p> <p>11 security layer."</p> <p>12 Agree or disagree?</p> <p>13 <b>A. Disagree.</b></p> <p>14 Q. You had complete information you believe?</p> <p>15 <b>A. They had information. The JV did hold information about</b></p> <p>16 <b>what the military had in the area is my understanding,</b></p> <p>17 <b>the liaison team had information about what was in that</b></p> <p>18 <b>militarised zone.</b></p> <p>19 Q. And it is also your understanding that nothing was</p> <p>20 written down for reasons of security; is that right?</p> <p>21 <b>A. I don't know.</b></p> <p>22 Q. Then if you skip the next sentence it says:</p> <p>23 "There was only a limited exchange of information</p> <p>24 with the army. The [JV] was not therefore in a position</p> <p>25 to test its own planning assumptions."</p> <p style="text-align: center;">Page 51</p>
<p>1 be most able to speak to security?</p> <p>2 <b>A. I think -- so Mr Porter is a very senior person looking</b></p> <p>3 <b>after security. However, I think the person that you</b></p> <p>4 <b>could get better information from, because they would</b></p> <p>5 <b>understand the detail of the question you are asking, is</b></p> <p>6 <b>someone inside the JV rather than someone in BP, is what</b></p> <p>7 <b>I'm trying to say.</b></p> <p>8 Q. I just want to run through this a little bit more</p> <p>9 because it is important. The next paragraph says:</p> <p>10 "Although unforeseen and unprecedented an attack on</p> <p>11 In Amenas should not have been entirely inconceivable."</p> <p>12 Do you agree with that?</p> <p>13 <b>A. No.</b></p> <p>14 Q. Would you like to explain? What is it that you disagree</p> <p>15 with?</p> <p>16 <b>A. Well, I mean nothing is inconceivable. So I think the</b></p> <p>17 <b>statement is too -- that's what I find difficult with</b></p> <p>18 <b>this, you know. Nothing is inconceivable.</b></p> <p>19 Q. Mr Cobb told us that he found an attack of this nature</p> <p>20 inconceivable, his word in his witness statement. But</p> <p>21 you tell us that nothing's inconceivable?</p> <p>22 <b>A. That's right and conversely, anything is conceivable.</b></p> <p>23 <b>So when it says "entirely inconceivable", you know,</b></p> <p>24 <b>almost nothing is inconceivable.</b></p> <p>25 Q. Right. Then can I ask you about the last sentence:</p> <p style="text-align: center;">Page 50</p>	<p>1 Agree or disagree?</p> <p>2 <b>A. My understanding as far as I know there was a limited</b></p> <p>3 <b>exchange of information with the army. I don't know</b></p> <p>4 <b>what that was in detail, so I agree with that.</b></p> <p>5 <b>I don't fully agree with the next sentence because,</b></p> <p>6 <b>because they did have information about the military</b></p> <p>7 <b>capability. I think they were in a position to</b></p> <p>8 <b>understand how that stacked up against their planning</b></p> <p>9 <b>assumption. So I wouldn't -- I wouldn't agree with the</b></p> <p>10 <b>second sentence for that reason.</b></p> <p>11 Q. Let's put this to one side for the moment and come back</p> <p>12 to testing planning assumptions in due course.</p> <p>13 Can I ask you to just tell us a little bit more</p> <p>14 about the Algerian investigation into what happened at</p> <p>15 In Amenas and I am talking about an investigation aside</p> <p>16 from the criminal process.</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. Tell us about it, please?</p> <p>19 <b>A. Oh, sorry, can you -- sorry, can you just repeat the</b></p> <p>20 <b>question?</b></p> <p>21 Q. Yes. What investigation are the Algerians doing?</p> <p>22 <b>A. All I know is what the UK ambassador to Algiers has told</b></p> <p>23 <b>me. He has told me that there is a judicial</b></p> <p>24 <b>investigation and an enquiry, I'm not quite sure what</b></p> <p>25 <b>the exact legal term is, into the attack at In Amenas.</b></p> <p style="text-align: center;">Page 52</p>

13 (Pages 49 to 52)

<p>1 <b>That's all I know. When I meet the ambassador I ask him</b>                  2 <b>for an update and as far as I know it's in progress.</b>                  3 <b>That's all I know.</b>                  4 Q. Just to be clear about this, the ambassador is telling                  5 you about an investigation which is wholly separate to                  6 the criminal prosecution of those who were arrested at                  7 In Amenas whom the Algerians are remanding in custody?                  8 <b>A. So all I know is the way I described it. You know,</b>                  9 <b>I don't know the definition or differences between, you</b>                  10 <b>know, the various types of enquiry that the legal</b>                  11 <b>community -- all I know is he has explained to me is</b>                  12 <b>that the Algerian authorities are conducting an</b>                  13 <b>investigation into the attack at In Amenas. You know,</b>                  14 <b>the recollection of the words were "judicial". I don't</b>                  15 <b>know how to sort of locate that in terms of the</b>                  16 <b>different sort of legal -- so I am just telling you what</b>                  17 <b>I have been told.</b>                  18 Q. I am sorry to press you on this it is just we have so                  19 little information and the ambassador is not on the                  20 witness list. If you are able to tell us, is it                  21 a criminal investigation or not a criminal                  22 investigation?                  23 <b>A. I don't know.</b>                  24 Q. When was the last time you spoke to the ambassador?                  25 <b>A. I spoke to the ambassador about two weeks ago and that</b></p> <p style="text-align: center;">Page 53</p>	<p>1 instability in north and west Africa. Is this                  2 a document you have ever seen before?                  3 <b>A. I have seen the document, yes.</b>                  4 Q. Were you one of those who gave evidence to the Select                  5 Committee about In Amenas?                  6 <b>A. No.</b>                  7 Q. I am just going to ask you briefly, page 526 at                  8 paragraph 4. It is paragraph 5 actually:                  9 "We note that the UK Government expressed confidence                  10 in 2013 that it would in due course secure more                  11 information from its Algerian counterparts on the                  12 circumstances surrounding the permission to recover the                  13 plant from the terrorists. We would be grateful for an                  14 update."                  15 Do you see that?                  16 <b>A. Yes.</b>                  17 Q. And then paragraph 49, which is at 549 I think. In                  18 fact, if we take it up at paragraph 47 at the bottom of                  19 549:                  20 "Survivors of the crisis and relatives whom we met                  21 told us that they felt that many of their questions                  22 about the crisis had not been answered. They expressed                  23 concerns that the UK would put future cooperation with                  24 Algeria ahead of asking awkward questions about how the                  25 authorities had dealt with the crisis. We do understand</p> <p style="text-align: center;">Page 55</p>
<p>1 <b>was actually the new ambassador, so they have just</b>                  2 <b>changed out, and the ambassador who gave me the update</b>                  3 <b>about the investigation that we just talked about, that</b>                  4 <b>would have been around about June of this year. So when</b>                  5 <b>I met the ambassador two weeks ago he is a new</b>                  6 <b>ambassador, they've changed out, his level of knowledge</b>                  7 <b>is -- obviously he's coming up to speed on things, so</b>                  8 <b>his level of knowledge is less than the outgoing</b>                  9 <b>ambassador.</b>                  10 Q. Did you talk to him about the inquest?                  11 <b>A. The new ambassador?</b>                  12 Q. Yes.                  13 <b>A. We -- yes.</b>                  14 Q. Has he any information about the investigations in                  15 Algeria to feed into this process?                  16 <b>A. I don't believe so. The conversation we had about the</b>                  17 <b>inquest was purely sort of information only, the inquest</b>                  18 <b>is coming up in -- going to start on the 15th or at the</b>                  19 <b>time it was the 8th, and it was at that level. It was</b>                  20 <b>not at any level of significant information.</b>                  21 Q. Okay. I am just going to run a document past you                  22 briefly just because this is really important and I want                  23 to see if we can just see where we are with it. Core                  24 bundle 2, tab 13. This is the House of Commons Foreign                  25 Affairs Committee's report into extremism and</p> <p style="text-align: center;">Page 54</p>	<p>1 these views but the bulk of the evidence we have                  2 received leads us to believe that efforts by the UK to                  3 put pressure on the Algerian authorities for answers are                  4 unlikely to be successful and may even be                  5 counter-productive. The Secretary of State told us in                  6 correspondence that the UK Government had open channels                  7 of communication with the Algerian authorities. He was                  8 hopeful that the Algerian authorities would provide more                  9 information once their investigations were at a more                  10 advanced stage."                  11 Is there any more information about getting answers                  12 from the Algerians that you could give us?                  13 <b>A. No.</b>                  14 Q. Conspicuous by its absence from the witness list of                  15 those who are going to come and talk to us about what                  16 happened at In Amenas are the names of any Algerians.                  17 Have you asked your colleagues at Sonatrach to come and                  18 give evidence and assist us in finding out what happened                  19 and what went wrong?                  20 <b>A. No.</b>                  21 Q. Why not?                  22 <b>A. Because the formal investigations which are being led by</b>                  23 <b>the authorities, this is the subject of authorities not</b>                  24 <b>the subject of private companies.</b>                  25 Q. Let's just think about that a little bit. Is there any</p> <p style="text-align: center;">Page 56</p>

<p>1 kind of judicial process and investigation going on in 2 America?</p> <p>3 <b>A. I don't know.</b></p> <p>4 Q. Is Mr Cobb -- if Mr Cobb, so severely traumatised, can 5 come here and tell us what he went through why can't 6 someone from Sonatrach come and tell us what they did?</p> <p>7 <b>A. I don't know. I think it's -- if the British 8 authorities or the Norwegian authorities or the US 9 authorities wish for that party to be involved, you 10 know, they should request that.</b></p> <p>11 Q. Not your job, nothing to do with BP?</p> <p>12 <b>A. It's not my job to interfere with the formal 13 investigation by states.</b></p> <p>14 Q. No, let me be absolutely clear. I am not suggesting 15 that you should do anything improper or interfere in 16 anything judicial or any other sort of process. What 17 I am suggesting is that you as a representative of one 18 third, less than a third, of a JV, politely ask the 19 majority shareholder to participate into the 20 investigation, into the deaths of seven people. A part 21 of the plant run by a company that was the majority 22 shareholder of a JV, and I don't understand why you 23 haven't even politely asked them to do that. If they 24 say no, so be it. But why not ask, please?</p> <p>25 <b>A. Because again, we do not wish to bias, influence the</b> Page 57</p>	<p>1 <b>A. Yes.</b></p> <p>2 Q. Did he?</p> <p>3 <b>A. He said that he had passed it through to the appropriate 4 people to get it to the military, is my recollection.</b></p> <p>5 <b>So I --</b></p> <p>6 Q. Did you speak to him about this?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. Have you asked Mr Chikhi if he would come along and tell 9 us about the conversation that he tells you he had with 10 somebody else?</p> <p>11 <b>A. I have not asked Mr Chikhi to do that, no.</b></p> <p>12 Q. How much money does BP make out of In Amenas every day?</p> <p>13 MR POPAT: I'm really sorry but we are getting to a stage 14 where that is not either fair or appropriate to be asked 15 in the context of this inquest.</p> <p>16 THE CORONER: No, I don't think there has been a suggestion 17 that there has been a financial reason for not making an 18 enquiry, so is that really going to help us? I am not 19 sure it is.</p> <p>20 MS GOLLOP: Are you worried that if you make these requests 21 for assistance with establishing the basic facts from 22 your colleagues in Sonatrach with whom you have just 23 restarted piping out oil and gas at the plant, that that 24 will jeopardise the company in some way?</p> <p>25 <b>A. I'm not worried.</b> Page 59</p>
<p>1 <b>authorities -- this, you know, this whole act of terror 2 in this foreign jurisdiction involving multiple states, 3 the victims of around about nine different countries, 4 I believe that the authorities, the British authorities 5 and the Norwegian authorities, and the Algerian 6 authorities should be the ones asking the various 7 parties to participate, not the private companies, 8 should not be playing that role. I think that's what 9 I think about that.</b></p> <p>10 Q. Let us come at it from a different angle. There is 11 a gentleman called Mr Chikhi and -- is that right?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. Who is Mr Chikhi?</p> <p>14 <b>A. Mr Chikhi is the, I can't remember the precise job 15 title, but he is an executive vice president of 16 Sonatrach responsible for the associations in Sonatrach.</b></p> <p>17 Q. Am I right in thinking that he was telephoned on the day 18 that the plant was attacked by the terrorists?</p> <p>19 <b>A. That's correct.</b></p> <p>20 Q. And am I right in thinking that he was passed the 21 message, "please tell the military to back off or we're 22 going to be killed"?</p> <p>23 <b>A. Yes, he received that message, yes.</b></p> <p>24 Q. And he was being asked to pass that message on to the 25 military, wasn't he? Page 58</p>	<p>1 Q. So that's not the reason?</p> <p>2 <b>A. That's correct.</b></p> <p>3 Q. And you know nothing about the Algerian process at all, 4 the investigation?</p> <p>5 <b>A. Other than it's -- it has started, as the ambassador 6 explained to me. That's all I know at this stage.</b></p> <p>7 Q. Can I understand a little bit more about the connection 8 between Sonatrach and the Algerian government. Is 9 Sonatrach effectively a government owned company?</p> <p>10 <b>A. Sonatrach is the state hydrocarbon business, yes. So, 11 therefore, essentially you could say it's owned by them.</b></p> <p>12 Q. So if the Algerian government wanted to assist with 13 providing Sonatrach witnesses to this investigation it 14 could easily do so, couldn't it?</p> <p>15 <b>A. I'm not sure how easy it would be, but if the Algerian 16 government had decided to participate, then one assumes 17 they would be able to assuming there were 18 jurisdiction -- I'm not a legal person so I'm not sure.</b></p> <p>19 Q. No, they can make it very easy for Mr Chikhi for example 20 to get in an aeroplane and fly to London, in the same 21 way Mr Cobb has, and help us about the conversation that 22 he tells you he had with the military passing on the 23 message that agonized relatives were receiving 24 throughout that day with a request from the terrorists 25 to get the military to back off. They could do that, Page 60</p>

15 (Pages 57 to 60)

<p>1 couldn't they?</p> <p>2 <b>A. I don't know. I don't know whether they can do that.</b></p> <p>3 <b>I don't know whether the government could force</b></p> <p>4 <b>Mr Chikhi to come to an enquiry in a foreign land.</b></p> <p>5 <b>I honestly don't know.</b></p> <p>6 Q. I haven't said anything about forcing. Have you got</p> <p>7 reason to think that Mr Chikhi doesn't want to answer</p> <p>8 questions?</p> <p>9 <b>A. I have not got reason to think that, no.</b></p> <p>10 Q. Have you been over with him what happened that day, sat</p> <p>11 down around a table and understood the events of the</p> <p>12 day?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. Who was it he talked to at the military?</p> <p>15 <b>A. What I -- I don't know exactly who he talked to at the</b></p> <p>16 <b>military.</b></p> <p>17 Q. Why haven't you asked him?</p> <p>18 <b>A. So what he's explained, which is what he explained on</b></p> <p>19 <b>the day, is that like any crisis response there are</b></p> <p>20 <b>people allocated to certain roles, and when the request</b></p> <p>21 <b>that you are referring to came into them he passed it --</b></p> <p>22 <b>obviously he had a role in the crisis response that</b></p> <p>23 <b>Sonatrach established and he had a role and he passed it</b></p> <p>24 <b>to the relevant person, the message of: can the military</b></p> <p>25 <b>be -- now, who Mr Chikhi actually passed that individual</b></p> <p style="text-align: center;">Page 61</p>	<p>1 <b>military and so it's unlikely that the military would,</b></p> <p>2 <b>you know, play back to us exactly what they were going</b></p> <p>3 <b>to do with that information. I repeatedly during the</b></p> <p>4 <b>incident passed that message through to our contacts in</b></p> <p>5 <b>Sonatrach and passed it through the crisis centre in BP</b></p> <p>6 <b>and probably Statoil were doing the same through their</b></p> <p>7 <b>channels, I don't know. And I passed that message</b></p> <p>8 <b>through numerous times. We could establish how many</b></p> <p>9 <b>times looking at the statement I gave to the</b></p> <p>10 <b>Metropolitan Police. I passed that numerous times and</b></p> <p>11 <b>they acknowledged that that had taken place.</b></p> <p>12 THE CORONER: But the question -- so just so response</p> <p>13 because it has been used in two senses. You have passed</p> <p>14 that on. The point you are making is as to what the</p> <p>15 plan of action is, how the incident is going to be dealt</p> <p>16 with by the military, that is a different kind of</p> <p>17 response, isn't it?</p> <p>18 <b>A. Yes, yes.</b></p> <p>19 MS GOLLOP: I am going to suggest that you have been fobbed</p> <p>20 off, haven't you?</p> <p>21 <b>A. No.</b></p> <p>22 Q. You must be itching to know what the military's response</p> <p>23 to that request was, aren't you?</p> <p>24 <b>A. The -- no. The military -- this was under -- the</b></p> <p>25 <b>incident you are talking about, the attack, it was all</b></p> <p style="text-align: center;">Page 63</p>
<p>1 <b>message to and who actioned it I don't know precisely</b></p> <p>2 <b>who that person is. He told me that that message had</b></p> <p>3 <b>been passed on to the military, but you can imagine</b></p> <p>4 <b>there would be a hierarchy and there would be</b></p> <p>5 <b>a communication channel from Mr Chikhi to the military.</b></p> <p>6 THE CORONER: Beyond it being passed on did he ever say</p> <p>7 whether there was a response to it or merely that he had</p> <p>8 passed that message on?</p> <p>9 <b>A. He explained to me including his -- another person who</b></p> <p>10 <b>was referred to yesterday, Mr Said Sahnoun, both of them</b></p> <p>11 <b>said to me: "that message has been passed on." And that</b></p> <p>12 <b>would have had to go through probably their boss and</b></p> <p>13 <b>probably the Minister of Energy for Algeria,</b></p> <p>14 <b>^ Mr Yusuf Yusfi, referred to as his Excellency and</b></p> <p>15 <b>they both said that that message has been passed on.</b></p> <p>16 <b>Then it was over to them to find the appropriate</b></p> <p>17 <b>channel to get that information down to the commander in</b></p> <p>18 <b>chief at the site. And they informed me that they had</b></p> <p>19 <b>done that.</b></p> <p>20 MS GOLLOP: Did they tell you what response they had had</p> <p>21 from the commander in chief at the site?</p> <p>22 <b>A. No, they didn't. I can't recall them telling me exactly</b></p> <p>23 <b>what their response was.</b></p> <p>24 Q. Did you ask? Don't you want to know?</p> <p>25 <b>A. The response was under the exclusive control of the</b></p> <p style="text-align: center;">Page 62</p>	<p>1 <b>under the control of the military.</b></p> <p>2 Q. I do understand about the ring of steel. You are</p> <p>3 completely in the hands of the Algerian military and</p> <p>4 I want to understand, you told us you have good channels</p> <p>5 of communication please. Why are you not having</p> <p>6 communication with the military about what they did in</p> <p>7 response to the requests from the terrorists to back off</p> <p>8 or they would start killing people?</p> <p>9 <b>A. The military guard that as the preserve of the</b></p> <p>10 <b>military --</b></p> <p>11 Q. It is a secret and they won't tell you?</p> <p>12 THE CORONER: I am sorry, that is twice you have done it and</p> <p>13 I just think politeness. I am so sorry. Please you</p> <p>14 just make sure you finish the answer you want to give.</p> <p>15 All right.</p> <p>16 <b>A. Sorry.</b></p> <p>17 THE CORONER: That's all right and what you had began was,</p> <p>18 I am just looking at note i have, was the military guard</p> <p>19 that, namely what the response will be as the preserve</p> <p>20 of the military and then you were interrupted.</p> <p>21 <b>A. In essence, that was the end. Sorry.</b></p> <p>22 MS GOLLOP: You hit a brick wall?</p> <p>23 <b>A. The -- I wouldn't describe it like that.</b></p> <p>24 Q. You have just restarted the operation at In Amenas about</p> <p>25 two weeks ago; is that right?</p> <p style="text-align: center;">Page 64</p>

16 (Pages 61 to 64)



<p>1 <b>A. Several weeks ago -- sorry, what -- say your question</b>  2 <b>again?</b>  3 THE CORONER: The question was: you just restarted the  4 operation at In Amenas about two weeks ago.  5 <b>A. No.</b>  6 MS GOLLOP: Was there a cessation for a period of time in  7 pumping oil and gas out of the In Amenas facility?  8 <b>A. There was following the attack. The production was</b>  9 <b>stopped for about one month and then the production</b>  10 <b>started up again.</b>  11 Q. What changed very recently?  12 <b>A. So what changed recently was the remobilisation of expat</b>  13 <b>staff to the site.</b>  14 Q. What assurance do you have that you will be able better  15 to communicate with the military in the event of another  16 terrorist attack on In Amenas?  17 <b>A. So going forward we have established an additional</b>  18 <b>dialogue with a -- through the UK embassy to an Algerian</b>  19 <b>general.</b>  20 Q. Who is that at the embassy?  21 <b>A. That is the defence attache.</b>  22 Q. Who is that?  23 <b>A. The current defence attache is ^ Alastair Burn.</b>  24 Q. Just so have we have it the current ambassador is?  25 <b>A. Andrew Noble.</b></p> <p style="text-align: center;">Page 65</p>	<p>1 terrorist attacks on the hydrocarbon industry, agreed?  2 <b>A. Yes.</b>  3 Q. Would you expect the Foreign Office to have passed it on  4 to you if they had been aware of it at the time?  5 <b>A. Yes.</b>  6 Q. Why?  7 <b>A. Because it's important information. If -- I mean if it</b>  8 <b>was validated possibly, and I can't speak for the FCO,</b>  9 <b>they may have seen it and they may have checked out to</b>  10 <b>see if it was validated or not and maybe it wasn't</b>  11 <b>validated and that's why they didn't pass it on. If</b>  12 <b>they did pick it up and they did validate it, I would</b>  13 <b>have expected them to have shared that information with</b>  14 <b>the industry.</b>  15 Q. Would you have expected them to tell you about it before  16 validating, because a validation could take some time  17 and you want to be alerted to the article at the time  18 that it's printed, don't you?  19 <b>A. Yes, they would -- I would expect them to tell us before</b>  20 <b>they validate it, you know, to give as much notice as</b>  21 <b>possible.</b>  22 Q. Thank you. I want to move on and ask you some questions  23 about the ring of steel. Were you in court yesterday  24 when Mr Cobb gave his evidence?  25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 67</p>
<p>1 Q. Thank you. Let's move on to something else. You told  2 us yesterday that Mr Shaw had very good flow of security  3 information and he talked to defence attaches, security  4 firms and others to gather intelligence about the  5 security threat to the JV's interests in Algeria. Did  6 he have contact with British spies?  7 <b>A. I don't know.</b>  8 Q. Did he have any DRS informants?  9 <b>A. I don't know.</b>  10 Q. You have been asked some questions briefly, I think,  11 about the El Khabbar newspaper article that appeared  12 in November 2012. You know the one that I'm talking  13 about?  14 <b>A. I have been shown a translation of it, yes, post the</b>  15 <b>attack.</b>  16 Q. Post the attack. That is a newspaper article that you  17 expected your liaison and security function to pick up  18 at the time that it was printed, isn't it?  19 <b>A. I would have expected it, yes.</b>  20 Q. Whether verified or not it was important, wasn't it?  21 <b>A. Yes.</b>  22 Q. And one of the reasons it was important was because this  23 would have been a very unusual indication that an oil  24 and gas facility was being considered for a terror  25 attack. Whereas traditionally there hadn't been</p> <p style="text-align: center;">Page 66</p>	<p>1 Q. And the day before?  2 <b>A. I missed part of the day before.</b>  3 Q. Were you in court when he held up the very large maps  4 that you have to either side of you and indicated for us  5 the geographical circumference of the ring?  6 <b>A. Yes.</b>  7 Q. Do you agree with the area that he indicated?  8 <b>A. Broadly speaking, yes.</b>  9 Q. And you agree that the southeastern part of the ring is  10 coterminous with the Algerian border with Libya?  11 <b>A. Yes.</b>  12 Q. I went through with him what the layers of the ring  13 comprise and we have already looked at the Statoil  14 report. So I will take this very briefly. In its  15 broadest sense one of the layers of the ring is the DRS  16 which provides intelligence as to security threats to  17 the military, agreed?  18 <b>A. Yes.</b>  19 Q. And then we have the military that is guarding the  20 border with, amongst other countries, Libya, agreed?  21 <b>A. Yes.</b>  22 Q. And then we have the military that is protecting and  23 keeping safe those inside the military zone?  24 <b>A. Yes.</b>  25 Q. And finally, we have the Gendarme at the Gendarmerie?</p> <p style="text-align: center;">Page 68</p>

1 **A. Yes.**  
 2 Q. Briefly about the DRS. They are a highly effective  
 3 security service, aren't they?  
 4 **A. The security professionals say that they are, yes.**  
 5 Q. I am not suggesting you go down the bar with a bunch of  
 6 DRS agents and you know exactly what they do and how  
 7 they go about their business. I am talking, I suppose,  
 8 in terms of reputationally and your experience as the  
 9 head of north Africa over many years?  
 10 **A. Yes.**  
 11 Q. They employ ruthless methods, don't they?  
 12 **A. I don't know.**  
 13 Q. And they are a security service that has honed its skill  
 14 during a bloody and exceptionally violent struggle for  
 15 independence from colonial rule and then refined those  
 16 tactics during a decade long civil war against Islamist  
 17 militants in southern Algeria, agreed?  
 18 **A. Those are your words. I mean all I know about the DRS**  
 19 **is that they are the security service arm of the**  
 20 **Algerian state. You know, describing it in the way**  
 21 **is -- that's all I know. That's what the DRS are.**  
 22 Q. Have you made a study of Algerian history?  
 23 **A. No.**  
 24 Q. Do you agree with Mr Cobb that the DRS must have known  
 25 about the terrorist training camp on the Libyan side of

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1 the border with Algeria?  
 2 **A. Sorry, repeat the question?**  
 3 Q. Do you agree with Mr Cobb that the DRS, I think his  
 4 words were, "it would be highly surprising had they not  
 5 known about the terrorist training camp on the Libyan  
 6 side of the border with Algeria"?  
 7 **A. I would agree with that.**  
 8 Q. If you don't know I know you will tell me you don't but  
 9 I am going to assume that Belmokhtar and Boucheneb are  
 10 players, to use a felicitous word, in the terrorist  
 11 arena in north Africa who are well known to the DRS,  
 12 agree?  
 13 **A. I would expect that they would know those individuals,**  
 14 **yes.**  
 15 Q. Moving to a different topic, the Gendarme. The rapid  
 16 reaction force. Ever heard of that prior to the attack?  
 17 **A. No.**  
 18 Q. I want to ask you about some paragraphs in your witness  
 19 statement, please. I have that in a separate witness  
 20 statement bundle which I perceive may not be the bundle  
 21 where everybody else has it so I would be grateful for  
 22 some help in assisting you to locate it. It may be that  
 23 you have it in front of you.  
 24 MS DOLAN: It is in bundle 1, tab 15.  
 25 MS GOLLOP: I am very grateful.

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1 Could I ask you to look at paragraphs 43 and 45.  
 2 You set out here the functions of the liaison team. At  
 3 paragraph 43 you say the functions were:  
 4 "...liaise between the JV, the military, Gendarmes  
 5 and SSI."  
 6 Yes?  
 7 **A. Yes.**  
 8 Q. And liaising between those bodies would, you say,  
 9 "include arranging transport, coordinating support for  
 10 work being carried out at the plant and the rigs and at  
 11 sites." Yes?  
 12 **A. Yes.**  
 13 Q. And then in paragraph 44 you talk about meeting expats  
 14 at airports and security briefings. And then in  
 15 paragraph 45 you talk about reporting to the JOC on the  
 16 security situation generally and anything specific and  
 17 at Hassi Messaoud the managers of the team there would  
 18 report on a higher level to the JV's business support  
 19 manager.  
 20 Is that an exhaustive list of liaison functions?  
 21 **A. Well they didn't report to me, so it's probably not an**  
 22 **exhaustive list. There's probably something -- there**  
 23 **could be something missing, but I would say, you know,**  
 24 **my -- for the benefit of this purpose I would say**  
 25 **broadly speaking, yes, that's right but an exhaustive**

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1 **list, is, you know, something I haven't done here.**  
 2 **I have just given you an overview, as I understood it.**  
 3 Q. I am going to suggest to you that it was not within the  
 4 remit of the liaison team to assess the effectiveness of  
 5 the Algerian military. Would you agree?  
 6 **A. No, I wouldn't agree. So the liaison team I know used**  
 7 **to have contact with the military. The liaison manager**  
 8 **in Hassi Messaoud had a good network of military**  
 9 **contacts. I know that they have met people. They**  
 10 **specifically met, for example, the colonel following the**  
 11 **Ourgla suicide bombing on the Gendarme barracks, so I do**  
 12 **know that they have capability to contact the military**  
 13 **and have a dialogue about capability.**  
 14 Q. Have a dialogue about capability. What does that mean?  
 15 **A. Have a conversation about what their resources are and**  
 16 **that type of conversation between security**  
 17 **professionals.**  
 18 Q. There is a difference, isn't there, between having  
 19 a conversation about numbers, how many tanks you have  
 20 got, how many helicopters you have, how many men on the  
 21 ground, how many rounds of ammunition and so on and  
 22 assessing effectiveness, agreed?  
 23 **A. Yes.**  
 24 Q. I am interested in assessing effectiveness. How did  
 25 they do that?

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<p>1 <b>A. I don't know. You'd have to speak directly to the</b>  2 <b>liaison manager.</b>  3 Q. I am going to suggest that they just didn't. Is that  4 fair?  5 <b>A. I don't think that's fair.</b>  6 Q. Did they ever go out on manoeuvres with the Algerian  7 military?  8 <b>A. I don't know.</b>  9 Q. Ever see an Algerian soldier fire a gun?  10 <b>A. Myself or them?</b>  11 Q. I am talking about the people that you are relying on to  12 assess the effectiveness of the ring of steel?  13 <b>A. I don't know.</b>  14 Q. From what you have told me it amounts to having  15 a conversation and no more than that?  16 <b>A. They had contact with them and they had meetings with</b>  17 <b>them. Beyond that the example you are using of firing</b>  18 <b>a weapon I don't know whether they did that to see --</b>  19 <b>I don't know.</b>  20 Q. Would you agree with Mr Cobb that there was never any  21 drill, simulation or practice exercise with either the  22 Gendarme or the military?  23 <b>A. I don't know. I honestly don't know whether they did or</b>  24 <b>they didn't. I'm aware that they had some form of</b>  25 <b>exercises at the site to do practice but whether that</b>  Page 73</p>	<p>1 behalf of Sebastian John. And she is asking about  2 layers of protection and a lack of alarm guard at VCP1.  3 And you say:  4 "[The] military just has to be effective. It  5 doesn't have to be perfect."  6 And then at the bottom your answer is in bold:  7 "No, you can't say perfect but you have to look at  8 what's probable and what's probable is that the military  9 will intercept people in that zone."  10 I just want to keep that on the screen for a moment.  11 When you undertake a risk assessment you have to plan  12 for an improbable event that might have devastating and  13 fatal consequences, don't you?  14 <b>A. When there are risk assessments, they look at probable</b>  15 <b>scenarios based around the judgment of security</b>  16 <b>professionals and then that risk is assessed and control</b>  17 <b>measures are developed to reduce that risk to</b>  18 <b>a manageable risk. Does that make sense?</b>  19 Q. Can I ask you to find core bundle 1 at tab 7. This is  20 the JV's risk management procedure. Is this a document  21 that you have seen before?  22 <b>A. Yes.</b>  23 Q. Could you look at page 37, it says:  24 "How to assess risk. For each risk event an  25 assessment of its likelihood and potential impact shall  Page 75</p>
<p>1 <b>was an integrated field style of exercise I don't know.</b>  2 Q. When you say "they" who do you mean?  3 <b>A. The JV.</b>  4 Q. You are aware that the JV had some kind of exercise?  5 <b>A. My understanding is that there were -- there was a level</b>  6 <b>of testing of alarms and understanding that I had that</b>  7 <b>awareness, I can't point to specifics, but I am not</b>  8 <b>aware if they -- they meaning the JV -- conducted joint</b>  9 <b>Gendarme/military field type exercises. So, therefore,</b>  10 <b>I can't fully agree with Mr Cobb because I don't know.</b>  11 Q. You don't know. When you say "alarm" do you mean like  12 a fire drill?  13 <b>A. Yes, my understanding the alarms would have been tested,</b>  14 <b>yes.</b>  15 Q. The kind of drill or simulation or practice that I am  16 talking about is let's test the ring of steel and see  17 what happens and how effective it is in the event of  18 a simulated sort of attack. Let's do a mock of  19 a suicide bomber walking across the desert towards the  20 facility for example. Ever any testing like that?  21 <b>A. I don't know.</b>  22 Q. I am hopeful that we are going to be able to bring up on  23 the screen page 243 of yesterday's transcript.  24 Thank you. These are some answers that you gave  25 yesterday in response to questions by Ms Gerry asking on  Page 74</p>	<p>1 be made."  2 And you look at probability frequency criteria and  3 then over the page there is risk probability and  4 description and number 1 is a remote responsibility  5 a similar event hasn't yet occurred, yes? You have that  6 at one end of the spectrum?  7 <b>A. Yes.</b>  8 Q. And at the other end of the spectrum you have number 5,  9 common occurrence, at least annually, at the facility,  10 yes?  11 <b>A. Yes.</b>  12 Q. So you have a scale of likelihood ranging from highly  13 unlikely all the way through to happens every year or  14 more?  15 <b>A. Yes.</b>  16 Q. Yes?  17 <b>A. Yes.</b>  18 Q. Then over the page, 39, you have severity of risk and at  19 the top of the scale you have more than 10 fatalities  20 and at the bottom of the scale you have major injuries  21 or health effects, including lacerations, burns,  22 sprains, minor fractures et cetera, yes?  23 <b>A. Yes.</b>  24 Q. So again you have a scale of effect and one of the core  25 principles of risk assessment is looking at how often  Page 76</p>

<p>1 something happens and what the effect of it might be and 2 sort of drawing up a matrix for those, yes? 3 <b>A. Yes.</b> 4 Q. Events that might have only a very tiny chance of 5 happening but if they did happen the consequences would 6 be devastating in terms of loss of life are difficult to 7 cater for in a risk assessment, aren't they? 8 <b>A. Yes.</b> 9 Q. If you look at page 45 you have your terrorist attack 10 kidnap action plan. You are hopefully going to be able 11 to help us with this. In the top right it says "Year 12 2012, "do you have that? 13 <b>A. Yes.</b> 14 Q. "Risk impact D. Risk probability 5." 15 Can you just, to use a horrid word, unpack that for 16 us? 17 <b>A. This is a JV risk action plan, so I mean, I haven't</b> 18 <b>seen -- I have seen this but this is not something</b> 19 <b>I have -- to be able to unpack it I need to sort of know</b> 20 <b>the detail and because this document is not something</b> 21 <b>that I've produced, nor approved, it's sort of difficult</b> 22 <b>for me to do that.</b> 23 Q. That's quite all right, Mr Collins. Who is going to be 24 the best person to extrapolate it for us? Is that going 25 to be Mr Porter?</p> <p style="text-align: center;">Page 77</p>	<p>1 Q. You are sitting across the border running a hydrocarbon 2 plant, a very attractive target for a terrorist attack, 3 and you know that across the border is an enormous 4 lawless ungoverned void which is likely to harbour 5 terrorists, that is the reality in which you were 6 operating in January 2013, isn't it? 7 <b>A. Yes.</b> 8 Q. And you know that if armed terrorists ever managed to 9 access the In Amenas facility and take anybody hostage 10 the Algerian military are going to shoot first and ask 11 questions afterwards, if they ask questions, agreed? 12 <b>A. That would have to assume that a group would get across</b> 13 <b>the border.</b> 14 Q. Yes, let's work on that -- sorry, I don't want to 15 interrupt you but let's make that assumption. 16 <b>A. So --</b> 17 Q. The ring of steel has failed? 18 <b>A. Okay, so all the outer layers have failed.</b> 19 Q. Yes. 20 <b>A. And so what was the final part to your question?</b> 21 Q. You know that if anybody is taken hostage the Algerian 22 military are going to shoot first and ask questions 23 afterwards? 24 <b>A. I don't know that.</b> 25 Q. You don't?</p> <p style="text-align: center;">Page 79</p>
<p>1 <b>A. I would say it's probably the -- both the business</b> 2 <b>support manager and the liaison manager, because that's,</b> 3 <b>if you see it says "the owner" on the top left. So they</b> 4 <b>would be able to explain that.</b> 5 Q. Very well. Let's put it to one side. It is not fair to 6 ask you questions about a document that you haven't 7 approved and don't know about. It won't get us 8 anywhere. 9 Let us just go back to your evidence yesterday. You 10 have to look at what's probable. No, you don't. You 11 have to look at what's almost inconceivable, don't you? 12 <b>A. No, I think you do need to focus the scenarios into</b> 13 <b>probable. Just to be able to -- I think you do.</b> 14 <b>I think you need to look at things that are probable</b> 15 <b>rather than, you know -- completely conceivable. It's,</b> 16 <b>you know, it's conceivable that an aeroplane could have</b> 17 <b>a technical fault with take off and it could land and</b> 18 <b>crash on the building but it is not probable and you</b> 19 <b>wouldn't design this facility for that sort of scenario.</b> 20 <b>So just using that as an example, where you do need to</b> 21 <b>use security professionals when you are looking at</b> 22 <b>security events, based around their judgment with the</b> 23 <b>context, to predict a probable event and then set about</b> 24 <b>putting a risk action plan with control measures around</b> 25 <b>it. That is what I'm trying to say.</b></p> <p style="text-align: center;">Page 78</p>	<p>1 <b>A. I don't know if the Algerian military are going to do</b> 2 <b>that or not do that.</b> 3 Q. Do you know what their plan is for how to rescue 4 hostages on the In Amenas plant? 5 <b>A. No.</b> 6 Q. What their risk assessment is for that scenario? 7 <b>A. No. The military would, I'm assuming, determine what</b> 8 <b>their tactical plan would be. I don't know whether</b> 9 <b>their tactical plan is to, as you describe, shoot first</b> 10 <b>and ask questions later or whether to attempt a rescue.</b> 11 <b>I don't know what the Algerian military's plan is for</b> 12 <b>that situation.</b> 13 Q. You don't know what the plan is. Okay? 14 <b>A. Yes.</b> 15 Q. I am going to suggest that the JV's plan about how to 16 guard against a risk of a terrorist attack on the 17 In Amenas facility went: plan A, rely on the ring of 18 steel, agreed? 19 <b>A. Rely on the multiple layers and rely upon the risk</b> 20 <b>assessment underpinning processes that they have, so</b> 21 <b>it's not just about the physical things. It's also</b> 22 <b>their assessment of risk and their presence and their</b> 23 <b>alert level. So, you know, that's an underpinning</b> 24 <b>process. It is not a physical process but it is</b> 25 <b>a process. Information gathering, intelligence</b></p> <p style="text-align: center;">Page 80</p>

20 (Pages 77 to 80)

<p>1 <b>gathering and so forth.</b></p> <p>2 Q. Your intelligence tells you: we have a terrorist threat</p> <p>3 sitting 30-miles across the border and we need to be on</p> <p>4 a very high alert to guard against the risk of</p> <p>5 terrorists attacking the plant. That's what your</p> <p>6 intelligence tells you, yes?</p> <p>7 <b>A. It says that there are, you know, terrorists but you</b></p> <p>8 <b>used the word "high alert" and so the assessment of that</b></p> <p>9 <b>in the JV's management system was not converting that</b></p> <p>10 <b>into a high alert, but they were aware of terrorists or</b></p> <p>11 <b>groups that would declare themselves as terrorists in</b></p> <p>12 <b>Libya.</b></p> <p>13 Q. Let us come at this another way and just briefly --</p> <p>14 THE CORONER: I think almost everybody has gone through</p> <p>15 this.</p> <p>16 MS GOLLOP: I know.</p> <p>17 THE CORONER: And I can assure you I have this point.</p> <p>18 MS GOLLOP: I am grateful.</p> <p>19 THE CORONER: We have been two hours. I am not -- we have</p> <p>20 been two hours and 20 minutes on questioning which</p> <p>21 between the two of you the estimate was an hour.</p> <p>22 MS GOLLOP: I am sorry.</p> <p>23 THE CORONER: And quite a bit of it happened yesterday</p> <p>24 afternoon and unless I stop you at the end of your</p> <p>25 estimate the timetable -- because you know we have</p> <p style="text-align: center;">Page 81</p>	<p>1 <b>A. Can you show that to me?</b></p> <p>2 Q. I'm not sure if I can. I would be able to if I had</p> <p>3 a couple of minutes of break if you told me there</p> <p>4 haven't been such discussions?</p> <p>5 THE CORONER: We are going to have a break anyway and see if</p> <p>6 you can track it.</p> <p>7 MS GOLLOP: I will then have no more than five minutes.</p> <p>8 THE CORONER: That's all right. So we'll have a ten-minute</p> <p>9 break now and just see if we can identify the precise</p> <p>10 passage.</p> <p>11 <b>A. Thank you.</b></p> <p>12 <b>(11.50 am)</b></p> <p>13 <b>(A short break)</b></p> <p>14 <b>(12.15 pm)</b></p> <p>15 THE CORONER: Can I just say this, just picking up a point</p> <p>16 you were making this morning, that at some point I think</p> <p>17 I will want to put on record the efforts that have been</p> <p>18 made, I think mostly by, so far as we are concerned, the</p> <p>19 senior coroner to get information and to make enquiries</p> <p>20 and so on, and the success or otherwise there has been</p> <p>21 with that. Simply because I think if organisations may</p> <p>22 perfectly reasonably have taken the position that there</p> <p>23 was going to be an inquest which would have access to</p> <p>24 particular sorts of information and have therefore taken</p> <p>25 a stance on that understanding, if the position is in</p> <p style="text-align: center;">Page 83</p>
<p>1 a witness could only be here today.</p> <p>2 MS GOLLOP: I am very sorry, sir I'll will speed up.</p> <p>3 THE CORONER: Everybody has dealt with this point, not just</p> <p>4 you, everyone has had a go at it and I have it.</p> <p>5 MS GOLLOP: I am grateful.</p> <p>6 Can you just explain to us what the reasons would be</p> <p>7 why you wouldn't put either an armed Gendarme at the</p> <p>8 gate or unarmed Gendarme in the guard towers?</p> <p>9 <b>A. The deployment of the Gendarmes is the captain's</b></p> <p>10 <b>decision and that would be something that would be</b></p> <p>11 <b>discussed in the JV.</b></p> <p>12 Q. Just going back to what went wrong with the ring of</p> <p>13 steel. You said that you have -- yesterday you told us</p> <p>14 that there have been discussions with the military and</p> <p>15 the Gendarmes about what went wrong. What is their</p> <p>16 assessment of what went wrong?</p> <p>17 <b>A. Sorry, remind me of what I said yesterday in that sense,</b></p> <p>18 <b>could you, please?</b></p> <p>19 Q. I am going to have to look back at the transcript which</p> <p>20 might take me a little bit of time.</p> <p>21 THE CORONER: Don't worry.</p> <p>22 MS GOLLOP: You were asked about, I think this was in</p> <p>23 questions from counsel for the inquest. There have been</p> <p>24 discussions between the military and the Gendarme about</p> <p>25 what went on since the attack. Do you remember that?</p> <p style="text-align: center;">Page 82</p>	<p>1 fact that we have met with less than the success we</p> <p>2 would have hoped for, it may be that other options of</p> <p>3 the sort that you were exploring may come into play.</p> <p>4 But it was just to say I have it well in mind what you</p> <p>5 said and I will, as I said, want to put on record the</p> <p>6 efforts that I'm aware of. But I will come back to</p> <p>7 that. That will be next week or something of that sort.</p> <p>8 MS GOLLOP: I'm grateful, sir. I am going to be very brief</p> <p>9 indeed with Mr Collins.</p> <p>10 One explanation of what went wrong is that every</p> <p>11 single layer of the ring of steel failed at exactly the</p> <p>12 same time, isn't it?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. Colossal failure of intelligence on the part of the DRS,</p> <p>15 agreed?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. Simultaneously colossal failure of the Algerian military</p> <p>18 to secure the border?</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. Simultaneously colossal failure of the Algerian military</p> <p>21 to have control of the military zone?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. And the Gendarme, as we know, did their best but they</p> <p>24 were not equal to the task with which they were</p> <p>25 presented which is hardly surprising?</p> <p style="text-align: center;">Page 84</p>

<p>1 <b>A. The Gendarme -- you said wasn't surprising, so, that was</b>  2 <b>surprising.</b>  3 Q. They are not in a position to, once 30 plus armed  4 terrorists arrive in jeeps, deal with that. Or did you  5 think they would be?  6 <b>A. The understanding was that the Gendarme were there to</b>  7 <b>protect the site and the people and that they would be</b>  8 <b>able to do that.</b>  9 Q. So every single layer broke down at the same time?  10 <b>A. It seems to me.</b>  11 Q. Is one explanation?  12 <b>A. Is one explanation, yes.</b>  13 Q. And one other explanation is that there was some degree  14 of state collusion and full knowledge of what was going  15 to happen, isn't it?  16 <b>A. I don't know.</b>  17 Q. I am just talking about the possibilities. One other  18 possibility is that what happened was on some level  19 permitted?  20 <b>A. So if you want to describe it as, is it possible?,</b>  21 <b>I suppose yes, it's possible.</b>  22 Q. What does Mr Barry Shaw think went wrong?  23 <b>A. I don't know what Mr Shaw thinks went wrong.</b>  24 Q. Have you not asked him, given that he was the man with  25 the intelligence network on the ground?  Page 85</p>	<p>1 I just want to ask you finally about the border.  2 Prior to the attack, it had been your understanding,  3 hadn't it, that the Algerian military had the border  4 under control?  5 <b>A. Yes.</b>  6 Q. Can I ask you, I really am getting to the end, witness  7 statement, volume 4 which -- if you look at tab 68 which  8 is right towards the back. Do you have that?  9 <b>A. No, I haven't got that (Handed). Thank you.</b>  10 Q. You have here a witness statement from a translator  11 which we don't need to look at but over the page you  12 will have a copy of a press conference given by the  13 Algerian Prime Minister on 21 January 2013. Have you  14 seen this before?  15 <b>A. No.</b>  16 Q. If you look at the last page of the document, do you  17 have that?  18 <b>A. Yes.</b>  19 Q. It should look like that. Not the page with the single  20 page but the other page. Right at the bottom?  21 <b>A. At the bottom -- what's the last word on the --</b>  22 Q. The last -- the first word is a bit easier.  23 "Question: Considering the strict control."  24 Do you have that at top of the page?  25 <b>A. No, I haven't got that. That's why I asked. The last</b>  Page 87</p>
<p>1 <b>A. Yes, but I can't speak for him.</b>  2 Q. No, just tell us what -- when you have asked him what  3 has he told you, what has he said is his appraisal of  4 what went wrong?  5 <b>A. Well, he also like many people still does not understand</b>  6 <b>the outer layer failure, what caused that to fail, which</b>  7 <b>we all are expecting to be at some stage if possible</b>  8 <b>from the formal investigation become available, but he</b>  9 <b>doesn't actually know because, you know, he's not able</b>  10 <b>to conduct the investigation.</b>  11 Q. Has he got a theory?  12 <b>A. I don't know.</b>  13 Q. When you talk about the outer layer failure you are  14 talking about the military's failure to keep the area  15 secure, is that right?  16 <b>A. It's the combination of the border and the military</b>  17 <b>zone, yes.</b>  18 Q. Did you --  19 THE CORONER: So not just the border but --  20 <b>A. Not just the border.</b>  21 THE CORONER: -- how it is these people through the night  22 are able to get to where they do.  23 <b>A. Not just the border, thank you.</b>  24 MS GOLLOP: I have in mind that both those areas are the  25 outer layer.  Page 86</p>	<p>1 <b>page begins with "Can tell".</b>  2 Q. Just look at the reverse of that page. The page before  3 that. Sorry, I have them double printed.  4 <b>A. Okay. So it says "Considering".</b>  5 Q. Yes, that's the one. If you look at the bottom  6 question, the last question being asked at this press  7 conference by a journalist who says:  8 "I understand that terrorists entered the Algerian  9 territories equipped with highly sophisticated weapons.  10 Are we not already in Sahelistan?"  11 If you look at three lines up from the bottom of the  12 page where the Prime Minister answers and he says:  13 "I told you earlier on that the length and the  14 difficulty of the borders which I can talk to you about  15 as personally I lived in Tamanrassat for four years and  16 I'm familiar with the whole region."  17 Then over the page he says:  18 "I can tell you that it's very difficult to control  19 the situation there. We do have means and people who  20 are up to it because the army, the police are not enough  21 to protect the borders."  22 That's the Prime Minister telling you that the army  23 is not enough to protect the borders. Did that come as  24 a surprise to you?  25 <b>A. Yes, a surprise.</b>  Page 88</p>

22 (Pages 85 to 88)

<p>1 Q. Because that cuts across every single assurance that the 2 JV was ever given in all the years of operation that it 3 could rely on the Algerian military to guarantee that 4 the border was under their control, doesn't it?</p> <p>5 <b>A. Well, obviously the Prime Minister is responding to 6 questions in the press conference and it is surprising 7 for him to say that. So, sorry, what was your next 8 question?</b></p> <p>9 Q. The whole of the JV operation in all of the years that 10 you were running the In Amenas plant very close to the 11 border with Libya, yes, it is only 30-miles away, was 12 based on a guarantee from the Algerian military and 13 Algerian state that the military had the border under 14 control, wasn't it?</p> <p>15 <b>A. No, there was never a guarantee given by the Algerian 16 military that the border was 100 per cent secure, and, 17 you know, he's obviously had to -- this is with the 18 awfulness of hindsight, has explained that that's a very 19 difficult border and this was in the aftermath of the 20 incident. I don't know why he said this. Is it 21 surprising the way it's worded? Yes.</b></p> <p>22 Q. Do you think that you should have known that this was 23 a porous border?</p> <p>24 <b>A. We were aware that the border is a very long extensive 25 border but what we were also aware of is the Algerian</b></p> <p style="text-align: center;">Page 89</p>	<p>1 <b>have come to me.</b></p> <p>2 Q. Let me ask you specifically has BP had any answers from 3 the Algerians as to how that happened?</p> <p>4 <b>A. No.</b></p> <p>5 MS GOLLOP: Thank you. No more questions.</p> <p>6 MR LAIDLAW: There are no questions from Statoil, thank you, 7 sir.</p> <p style="text-align: center;">Questions from MR POPAT</p> <p>9 MR POPAT: Mr Collins, can we just deal with a number of 10 discrete points but hopefully fairly short points that 11 arise from the answers you have given over the past 12 couple of days.</p> <p>13 First, you were taken to a series of legal materials 14 and asked to look at them and provide your agreement or 15 otherwise with certain passages in them. I think you 16 did make it clear you are not a lawyer or certainly not 17 an Algerian lawyer. Can we just see if you agree with 18 the overall position which I think is summarised in the 19 security management plan which is in the green bundle 20 behind divider 11, page 94. The heading is "Security 21 management". It is the first heading "Security 22 management". And it sets out in the paragraph below it 23 some details about the liaison function and then below 24 it that the security management of In Amenas is 25 accordingly split into two categories. The mandatory</p> <p style="text-align: center;">Page 91</p>
<p>1 <b>government had done a number of things to secure that 2 border, so, you know, the deployment of several thousand 3 troops in the middle of 2012, the additional guarding 4 posts numbering something like 80 which had been very 5 widely recognised, and the ongoing dialogue that the 6 Algerians quite often were leading with their 7 counterparts in Libya and Mali about borders. So it is 8 a very long border. Is it possible a person could get 9 across? Is it possible two people could get across? 10 Probably. But they were doing lots and lots of things 11 to secure that border. So when we say "porous" what 12 does that really mean? What does porous mean? Does it 13 mean one person can get across, two people can get 14 across or does it mean a very large unit of people could 15 get across?</b></p> <p>16 Q. On this occasion it meant the latter, didn't it?</p> <p>17 <b>A. It did and that was -- that I think is something highly 18 unexpected.</b></p> <p>19 Q. By the JV?</p> <p>20 <b>A. By the JV, yes.</b></p> <p>21 Q. And the JV has had no answers from the Algerians as to 22 how that happened?</p> <p>23 <b>A. I don't know whether the JV has had that, but as far as 24 I know, no, but I don't know exactly because it could 25 have come to the Sonatrach representative and that might</b></p> <p style="text-align: center;">Page 90</p>	<p>1 protection of the project by the Algerian forces and the 2 project's internal security.</p> <p>3 As a matter of law, did you understand that the 4 Algerian authorities dictated certain requirements and 5 required that military protection be provided to oil and 6 gas facilities within the hydrocarbon region?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. If you just go back to page 92, under the heading 9 "General", third paragraph down:</p> <p>10 "... Algerian law dictates [picking it up a few 11 words in] certain security requirements to be complied 12 with by all foreign operators with regards to expatriate 13 personnel installations. The most significant of these 14 is the mandatory presence of military protection."</p> <p>15 Is that consistent with your understanding of the 16 legal position?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. Internal security, a matter for the JV though that was 19 to be arranged through the different systems and 20 processes that we have already looked at with Mr Cobb 21 and which have been touched upon with you?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. Liaison team and then SSI taking its role. And then 24 through Sonatrach up to the regions insofar as there 25 needed to be any liaison about that?</p> <p style="text-align: center;">Page 92</p>

23 (Pages 89 to 92)

<p>1 <b>A. Yes.</b></p> <p>2 Q. We will look at one document in relation to that in just</p> <p>3 a moment. That was the legal material that was put to</p> <p>4 you. It was also suggested to you that in relation to</p> <p>5 the strike it was said or you said that the strike</p> <p>6 wouldn't cost anything and that was -- it was something</p> <p>7 you said to Mr Ritchie when he was asking you questions.</p> <p>8 Just to be clear about that, I think in fact when you</p> <p>9 were having the discussion about the impact on</p> <p>10 production and the effect on costs with Mr Ritchie you</p> <p>11 were looking at the crisis plan and moving from alert</p> <p>12 level medium to alert level high and you were saying</p> <p>13 that moving to alert level high and demanning</p> <p>14 effectively doesn't necessarily mean a drop in</p> <p>15 production or an affect on production. Is that right?</p> <p>16 <b>A. That's correct, yes.</b></p> <p>17 Q. In relation to the implications of the strike and the</p> <p>18 inability to have drivers present and the other</p> <p>19 implications there was a recognised potential</p> <p>20 implication in relation to costs?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. And that's the explanation that the CdG provided to</p> <p>23 Sonatrach in the email that you have already looked at</p> <p>24 which explained the position of the CdG?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 93</p>	<p>1 Q. A separate point. You were asked questions about what</p> <p>2 in some papers is being referred to as the VIP visit,</p> <p>3 the visit at the time of the attack. You know about</p> <p>4 that. Just so we understand it if you were to attend</p> <p>5 the site in In Amenas in your position did that ever</p> <p>6 warrant any different measures being undertaken or</p> <p>7 protections being taken or you being precluded from</p> <p>8 attending by reason of the potentially greater kidnap</p> <p>9 threat you might pose?</p> <p>10 <b>A. There would have been no additional precautions for my</b></p> <p>11 <b>visits. I would have been classified as a visitor in</b></p> <p>12 <b>other words.</b></p> <p>13 Q. The FCO advice was raised and drawn to your attention.</p> <p>14 Again, I think you are familiar with what it said at the</p> <p>15 time and this is a small point. We don't need to turn</p> <p>16 it up. But in case people proceed on what may be</p> <p>17 a misconceived basis, it refers to essential travel</p> <p>18 within 50 kilometres of the Libyan border. In Amenas,</p> <p>19 the facility, how far from the Libyan border was that?</p> <p>20 <b>A. 78 kilometres.</b></p> <p>21 Q. You were asked about the liaison team's functions and</p> <p>22 what you understood their role to be and the ambit of</p> <p>23 their responsibilities and you were taken, I think, to</p> <p>24 a paragraph in your witness statement which, if you have</p> <p>25 it handy we can look at it, paragraph 43 and 44 and you</p> <p style="text-align: center;">Page 95</p>
<p>1 Q. You have been asked a number of questions about the</p> <p>2 procedures and operations within the JV. On a number of</p> <p>3 occasions you sought to say that you are not part of the</p> <p>4 JV. Could you just explain that? What is your role and</p> <p>5 what was your role?</p> <p>6 <b>A. So my role is that I'm not in the JV. The JV consists</b></p> <p>7 <b>of, as we touched on yesterday, has a JOB which acts as</b></p> <p>8 <b>the operator, it has a JOC which is a select senior</b></p> <p>9 <b>number of those people and they report to the CdG.</b></p> <p>10 Q. The people who you are referring to are JV people?</p> <p>11 <b>A. Sorry, they are JV people. I am not a JV person.</b></p> <p>12 <b>I represent BP. Statoil is represented and Sonatrach is</b></p> <p>13 <b>represented and we interface with the JV through the</b></p> <p>14 <b>CdG. I am not a member of the JV and therefore I am not</b></p> <p>15 <b>part of that JOB. Sorry, is that clear?</b></p> <p>16 Q. Yes. You said that one of your jobs or titles was as</p> <p>17 the VP for non-operated JV businesses in Algeria?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. Could you just explain what non-operated JV means?</p> <p>20 <b>A. So, yes, I am the vice president for non-operated, so</b></p> <p>21 <b>the In Salah and the In Amenas businesses are JV</b></p> <p>22 <b>businesses and they are not operated by BP, so they are</b></p> <p>23 <b>described as a non-operated JV. Meaning clearly that BP</b></p> <p>24 <b>does not operate that JV. We are a participant in that</b></p> <p>25 <b>JV. That is what NOJV means.</b></p> <p style="text-align: center;">Page 94</p>	<p>1 were taken to 45 as well. You were asked if that</p> <p>2 represented a broad summary of your understanding of the</p> <p>3 liaison team's functions and views.</p> <p>4 You weren't asked to look at paragraph 46.</p> <p>5 Paragraph 46.1. What the liaison team did, you have</p> <p>6 explained in the words before the numbered paragraph,</p> <p>7 included:</p> <p>8 "The preparation of security risk assessments which</p> <p>9 consisted of the liaison team identifying potential</p> <p>10 risks at the JV site and weighing and analysing those</p> <p>11 risks and identifying mitigations against them</p> <p>12 happening."</p> <p>13 Is that something you understood the liaison team to</p> <p>14 be there to carry out?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. And did you understand that that is what they did carry</p> <p>17 out?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. More broadly in relation to risk assessments and</p> <p>20 security assessments, I am certainly not going to go</p> <p>21 through the materials that we have looked at with other</p> <p>22 witnesses and has been raised with you over the past two</p> <p>23 days. Just as an overall picture perhaps you can just</p> <p>24 help and confirm that this is a correct understanding:</p> <p>25 security assessments were undertaken by BP of the</p> <p style="text-align: center;">Page 96</p>

24 (Pages 93 to 96)



<p>1 security in the region, and that would be the north 2 Africa region for Algeria? 3 <b>A. Yes.</b> 4 Q. And that assessment of security included assessing 5 intelligence and obtaining an understanding of the 6 events and incidents that had occurred in that region 7 and assessing what sort of risks they posed to the 8 security of personnel working in that region? 9 <b>A. Yes.</b> 10 Q. It was a BP function, it was being carried out and there 11 are various documents which show that that was the 12 assessment that was being undertaken? 13 <b>A. Yes, that's correct.</b> 14 Q. And in addition, this is still at the BP end, BP also 15 had its own unit which was based in London which carried 16 out a separate but comparable assessment of security 17 risks throughout BP's operations? 18 <b>A. Yes.</b> 19 Q. And we'll hear from Mr Porter about the processes that 20 they followed, but that is a separate and continuing 21 obligation that BP were undertaking? 22 <b>A. Yes.</b> 23 Q. In addition, so far as the JV operation is concerned 24 there were JV specific assessments of risk and the 25 security requirements that pertained to the JV? Page 97</p>	<p>1 <b>A. The facility that we discussed yesterday is the JV base</b> 2 <b>in Hassi Messaoud which is in the town of Hassi Messaoud</b> 3 <b>and it's part of a larger base called 24 Fevrier, which</b> 4 <b>is a Sonatrach base, is that enough?</b> 5 Q. In terms of its location is it out in the desert or is 6 it -- 7 <b>A. Okay, sorry, so it is in the town. It is in what you</b> 8 <b>would call a suburb environment. It is not in the</b> 9 <b>desert.</b> 10 THE CORONER: In a built up environment? 11 <b>A. It is in a built up environment, yes, with population,</b> 12 <b>other offices, other activities going on surrounding it.</b> 13 MR POPAT: A solid wall obviously, I am sure you would 14 agree, carries with it the benefit or provides a benefit 15 of making it harder for people to penetrate through the 16 wall presumably? 17 <b>A. Yes.</b> 18 Q. However, unlike a fence it carries the disadvantage of 19 reducing the visibility through the fence to enable 20 people to see things or people that might be approaching 21 in the environment? 22 <b>A. Yes.</b> 23 Q. And in a desert environment where In Amenas is located 24 did you understand, and you have explained you are not 25 a security professional, but did you understand the use Page 99</p>
<p>1 <b>A. Yes.</b> 2 Q. They were carried out through the liaison team at 3 Hassi Messaoud? 4 <b>A. Yes.</b> 5 Q. And they produced a collection on a weekly, and in fact 6 monthly basis, a series of risk assessment type 7 documents which identified events and incidents that had 8 occurred and identified measures that needed to be 9 undertaken? 10 <b>A. Yes.</b> 11 Q. In addition, the In Amenas liaison team also carried out 12 a similar exercise and produced a different but 13 comparable weekly summary of risks? 14 <b>A. Yes.</b> 15 Q. And in addition to all of that the liaison team produced 16 the security management plan? 17 <b>A. Yes.</b> 18 Q. And the JV risk assessments? 19 <b>A. Yes.</b> 20 Q. A separate point, please. The position at 21 Hassi Messaoud. You were asked questions about the, 22 I think the existence or the construction of a solid 23 wall at Hassi as compared to the fences at In Amenas. 24 Can you just explain where the facility is in 25 Hassi Messaoud that we are referring to? Page 98</p>	<p>1 of fences of the type that were present to provide an 2 advantage in that regard? 3 <b>A. Yes, it does.</b> 4 Q. Was there a double fence or a double wall at Hassi in 5 the way there is a double fence at In Amenas? 6 <b>A. No, there is not a double wall at Hassi Messaoud.</b> 7 Q. A solid wall of course, as you have agreed, makes it 8 harder to get in potentially, though a double fence may 9 provide additional protection and make it just as hard 10 to get in, but it also, doesn't it, provides a greater 11 difficulty to exit through a fence or a wall? 12 <b>A. Yes.</b> 13 Q. In the way Mr Cobb was able to, thankfully? 14 <b>A. Yes.</b> 15 Q. You were asked a number of questions about the post 16 incident investigations and what BP has undertaken and 17 what it has not been able to undertake. 18 Through any sources of information available to BP 19 is it likely that you, BP, would be able to obtain 20 answers to questions such as: "how were the terrorists 21 able to get into Algeria?" 22 <b>A. It's unlikely.</b> 23 Q. How were they able to get through a militarised zone? 24 <b>A. That would be unlikely for us to be able the get that.</b> 25 Q. How were they able to amass what would appear to be Page 100</p>

25 (Pages 97 to 100)

<p>1 a sizeable cache of weapons undetected?</p> <p>2 <b>A. Unlikely for us.</b></p> <p>3 Q. How they were able to pass through checkpoints in the</p> <p>4 military zone, go through the Gendarme protected</p> <p>5 checkpoint, if they did, at La Recule and elsewhere?</p> <p>6 <b>A. Unlikely for us to be able to get that.</b></p> <p>7 Q. Is it the case nonetheless that insofar as BP and the JV</p> <p>8 partners have been able to gather information which may</p> <p>9 help provide input into determining physical security</p> <p>10 measures that may need to be changed or may need to be</p> <p>11 added to or modified that that has been done?</p> <p>12 <b>A. Sir, can you repeat the question?</b></p> <p>13 Q. Yes, it was a long question and not very clear. Has BP</p> <p>14 taken account of information that it has been able to</p> <p>15 obtain, together with the JV partners, to address</p> <p>16 potential modifications to the physical security</p> <p>17 measures at the site?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. Another witness is I think going to be able to explain</p> <p>20 to the coroner what those measures have been and have</p> <p>21 been undertaken, but has that been based on the</p> <p>22 information, such as it is, that the partners have been</p> <p>23 able to gather?</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. Has BP and have you personally had access to any of the</p> <p style="text-align: center;">Page 101</p>	<p>1 <b>A. Yes.</b></p> <p>2 Q. Was there also liaison between the oil companies that</p> <p>3 had facilities in the region?</p> <p>4 <b>A. Yes, there was on numerous levels.</b></p> <p>5 Q. That included the discussions that you have mentioned,</p> <p>6 that you undertook, I think, with your counterparts in</p> <p>7 other facilities and you have dealt with this at</p> <p>8 paragraph 50 or so of your witness statement. I am not</p> <p>9 going to ask you to turn it up at the moment,</p> <p>10 Mr Collins. It can be dealt with fairly shortly. You</p> <p>11 explain that there were meetings where security was</p> <p>12 always on the agenda, that people would go around the</p> <p>13 table to discuss perceptions of the security situation</p> <p>14 and that those discussions were further used to inform</p> <p>15 the position held by not only BP and Statoil but also</p> <p>16 the JV itself?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. Just give us an idea of the numbers of oil companies</p> <p>19 that would be involved in this sort of discussion?</p> <p>20 <b>A. That sort of discussion would involve 9 to 10 of the</b></p> <p>21 <b>foreign oil companies in Algeria.</b></p> <p>22 Q. And --</p> <p>23 <b>A. Which covered, just to add, that basically covered the</b></p> <p>24 <b>vast majority of the hydrocarbon industry in Algeria.</b></p> <p>25 Q. Would the people taking part in those discussions be at</p> <p style="text-align: center;">Page 103</p>
<p>1 materials generated by the Algerian investigations?</p> <p>2 <b>A. No.</b></p> <p>3 Q. You were asked about steps taken to ascertain variously</p> <p>4 the competence, the numbers, the strength of the</p> <p>5 Gendarmes and/or the military at different points.</p> <p>6 I will try and do this shortly if we can.</p> <p>7 Was it part of the liaison team's function to carry</p> <p>8 out that sort of assessment as best it was possible for</p> <p>9 them to be able to do?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. Did they report on a regular basis on their assessment</p> <p>12 of what the military and/or the Gendarmerie had been</p> <p>13 able to achieve through the various weekly summaries,</p> <p>14 monthly updates and the like that we have talked about?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. Did that include identifying, certainly what had been</p> <p>17 told to them, we don't know if they had some other means</p> <p>18 of verifying this, but what had been told to them about</p> <p>19 the numbers of gendarmes present on site?</p> <p>20 <b>A. Yes, it did.</b></p> <p>21 Q. Are those the sorts of figures which are included again</p> <p>22 in the security management plan that we have looked at</p> <p>23 and also, I won't take you to this because it is in</p> <p>24 another bundle, the liaison monthly updates and other</p> <p>25 documents of that sort?</p> <p style="text-align: center;">Page 102</p>	<p>1 a high level within the organisations such that if there</p> <p>2 was anything that needed to be done arising out of those</p> <p>3 discussions they would be in a position to try and</p> <p>4 effect some change?</p> <p>5 <b>A. Yes, those people were all in positions where they would</b></p> <p>6 <b>have been able to make change to influence and indeed</b></p> <p>7 <b>receive the appropriate information from their own</b></p> <p>8 <b>security functions.</b></p> <p>9 Q. In addition, so far as you personally are concerned, is</p> <p>10 it right that you would receive, for example, the</p> <p>11 regional security plan?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. Produced within BP?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. Which again, assessed the security interventions by the</p> <p>16 military, their performance and events that might be</p> <p>17 relevant to the regional security?</p> <p>18 <b>A. Yes, I was an addressee and a receiver of that regional</b></p> <p>19 <b>security plan.</b></p> <p>20 Q. A different topic. You were asked or it was suggested</p> <p>21 to you I think that how can you rely on the Gendarmes</p> <p>22 when they couldn't even look after their own front door?</p> <p>23 And that was said in reference to a terrorist attack at</p> <p>24 Ourgla Recule, I think possibly also at Tamanrassat.</p> <p>25 Just discuss that for a short while with me, Mr Collins.</p> <p style="text-align: center;">Page 104</p>

26 (Pages 101 to 104)

<p>1 First of all, I suppose we should just clarify something 2 that I think was put to you. I think it was suggested 3 in relation to Ourgla Recule that there's an example of 4 a terrorist bomber getting across the border, getting 5 through the zone or getting through a protected zone and 6 managing to get to La Recule and carry out the terrorist 7 activity? 8 <b>A. Yes.</b> 9 Q. It is probably in a number of places but it is probably 10 easier to use the orange bundle, behind tab 25. These 11 are extracts of documents so the page numbers are not 12 consecutive but if you look at the page numbers at the 13 bottom the fourth page in should be 263? 14 <b>A. Yes.</b> 15 Q. I think this is a document which is a control risks 16 report prepared, as it says, for Statoil at the bottom. 17 If you look somebody has highlighted a section at the 18 bottom? 19 <b>A. Yes.</b> 20 Q. And if you pick it up about four sentences down we see 21 it says: 22 "The Movement of Unity in Jihad in West Africa, an 23 offshoot of AQIM, claimed responsibility for the attack 24 highlighted in expanding region of Mali based militants. 25 In a comparable incident MUJWA claimed responsibility Page 105</p>	<p>1 <b>A. So Ourgla is also in relation to the In Salah JV, the 2 other JV, is probably about 500 kilometres away from 3 that. So that's the --</b> 4 Q. But an urban area? 5 <b>A. Urban area.</b> 6 Q. A police station there, the Gendarme station there 7 within that urban area? 8 <b>A. Yes.</b> 9 Q. Again, I stress you have said you are not a security 10 expert but you have been asked a number of questions 11 about what these sorts of events indicated or should 12 have indicated to you. Just help us then if you can 13 with this: the position at Ourgla is that it would 14 appear a lone suicide bomber was able to approach at 15 least the gate of the police station in Ourgla and 16 detonate a bomb which killed a Gendarme? 17 <b>A. Yes, that's my understanding.</b> 18 Q. Is, as far as you can say, any police force in 19 a position to provide sufficient protection to ensure 20 that that activity in an urban area would not be able to 21 be carried out? 22 <b>A. Sorry, just say the question again?</b> 23 Q. As far as you are aware would any police force be in 24 a position to guarantee that that sort of activity would 25 not be able to be carried out in an urban area? Page 107</p>
<p>1 for a June attack in Ourgla in which one Gendarme was 2 killed. Groups claimed to have used a radicalised 3 resident of Ourgla marks a change from the tactics that 4 the regional militant groups have traditionally 5 employed." 6 And it goes on to talk about other incidents. 7 Was it your understanding, as best you had an 8 understanding, that the incident at Ourgla was caused by 9 a resident of Ourgla who had carried out the activity 10 that is described there? 11 <b>A. Yes.</b> 12 Q. Just explain, if you can, where Ourgla is and what it 13 is? 14 <b>A. Ourgla is to the west of Hassi Messaoud, probably my 15 guesstimate of about 100 kilometres to the west of 16 Hassi Messaoud. It is something like 500, possibly even 17 600 kilometres away from In Amenas.</b> 18 Q. Do you understand whether it is an urban area or is it 19 desert land? 20 <b>A. Sorry, it's a provincial city for the Wilaya of Ourgla. 21 It is a local capital. It is an urban environment. Not 22 a desert environment. It is surrounded by desert. 23 I was explaining the distances, do you want me to carry 24 on?</b> 25 Q. Yes? Page 106</p>	<p>1 <b>A. No, no.</b> 2 Q. Is that similar to the sort of attack that we understand 3 occurred at In Amenas? 4 <b>A. No, it is not similar to the attack at In Amenas.</b> 5 Q. At In Amenas, again, as far as we understand it, did we 6 see a group, a sizeable group of terrorist forces 7 crossing the desert, past all the measures that you have 8 discussed without being spotted and effectively engaging 9 in what might be seen as slightly more conventional 10 warfare with those that were present and guarding the 11 location? 12 <b>A. Yes.</b> 13 Q. As far as you are aware, was there any precedent for 14 that sort of attack within Algeria? 15 <b>A. No.</b> 16 Q. When you've talked about your assessment of the security 17 within the region you have made mention of a number of 18 sources and documents and assurances that have been 19 provided to you. Is it right that at no stage before 20 this attack was any advice given to you to suggest that 21 there was a problem at In Amenas which was not able to 22 be controlled by the security measures that were in 23 place? 24 <b>A. That's correct.</b> 25 Q. Not from any of the sources you have mentioned that you Page 108</p>

27 (Pages 105 to 108)

<p>1 have had contact with or were communicated to you?</p> <p>2 <b>A. That's correct.</b></p> <p>3 Q. Again, just so that we are clear about that, that</p> <p>4 includes the other oil companies that have been</p> <p>5 identified?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. It includes the embassy?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. It includes the JV partners?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. It includes the liaison team and their functions insofar</p> <p>12 as they were communicated up to you?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. And it includes the various security assessments that</p> <p>15 were undertaken by BP?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. In the political economic forum, I think is what it was</p> <p>18 called, that you have mentioned in your witness</p> <p>19 statement and you were taken to some slides in relation</p> <p>20 to it, was it the position that as at that stage, which</p> <p>21 was November 2012, in fact looking at the region it was</p> <p>22 identified that there had been a decline in terrorist</p> <p>23 activity?</p> <p>24 <b>A. Yes, that's correct.</b></p> <p>25 Q. A number of incidents were examined and totalled up and</p> <p style="text-align: center;">Page 109</p>	<p>1 <b>A. I heard that that had been sort of brought in, yes.</b></p> <p>2 Q. What, that they weren't allowed to speak to the</p> <p>3 Gendarmes?</p> <p>4 <b>A. That -- I can remember that sort of issue arising, that</b></p> <p>5 <b>they were being, let's say, discouraged from that, yes.</b></p> <p>6 Q. Does that follow what you understood to be contained in</p> <p>7 the document you looked at with Mr Ritchie, which is in</p> <p>8 the core bundle, behind divider 3?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. Can we just turn that up, please. The translation is</p> <p>11 three pages in.</p> <p>12 <b>A. Which colour?</b></p> <p>13 Q. Green bundle, divider 3.</p> <p>14 <b>A. Yes, got it.</b></p> <p>15 Q. We will hear from the liaison team people so they'll</p> <p>16 explain what the position was so far as they understood</p> <p>17 it. But as you were taken to this document can we just</p> <p>18 understand what it relates to. It is in relation to,</p> <p>19 and you see this in the subject heading, "Internal</p> <p>20 security management", do you see that?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. If you go into the first paragraph:</p> <p>23 "Minutes of the District Security Commission's</p> <p>24 report. The involvement of expatriate managers in the</p> <p>25 management of internal security which is contrary to</p> <p style="text-align: center;">Page 111</p>
<p>1 we don't need to take up the slides again but there are</p> <p>2 charts which show the level of activity?</p> <p>3 <b>A. Yes, that's correct.</b></p> <p>4 Q. That there had been information communicated which was</p> <p>5 repeated in the slides that 7,000 extra soldiers had</p> <p>6 been put into the militarised zone to provide additional</p> <p>7 protection for the oil and gas facilities within it?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. And that was as a result of the perception of the</p> <p>10 increased risks insofar as they were identified arising</p> <p>11 from the Libyan situation?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. And that border protection had been reinforced by,</p> <p>14 again, the placement of additional troops and equipment</p> <p>15 to try and guard the borders?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. You were asked or it was suggested to you again that at</p> <p>18 some stage when SSI took over the responsibilities for</p> <p>19 internal security that the liaison team were expressly</p> <p>20 instructed not to communicate with the Gendarmes?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. I am paraphrasing a point that Mr Ritchie put to you.</p> <p>23 We have the exact quote. First of all, was that ever</p> <p>24 your understanding, that the liaison team were</p> <p>25 prohibited from communicating with the Gendarmes?</p> <p style="text-align: center;">Page 110</p>	<p>1 current regulations in force."</p> <p>2 And in particular, regarding communications with</p> <p>3 military authorities. And the rest which again you</p> <p>4 looked at.</p> <p>5 <b>A. Mmm.</b></p> <p>6 Q. Sorry, I should go on. The next paragraph says what's</p> <p>7 required and that is that:</p> <p>8 "For this reason and as required by the local and</p> <p>9 military authorities we ask that from now on you inform</p> <p>10 the JV partner that managing internal security is a role</p> <p>11 to be carried out exclusively by Sonatrach."</p> <p>12 So far as internal security is concerned, and that</p> <p>13 would be management of the guards and we know what the</p> <p>14 internal security layer is, we have looked at that many</p> <p>15 times. Was that something that, as you understood it,</p> <p>16 was to be managed by Sonatrach or rather through the</p> <p>17 arrangements that were put in place?</p> <p>18 <b>A. Yes, that was my -- yes.</b></p> <p>19 Q. To that end the ASI who was going to be appointed would</p> <p>20 be the person carrying out the liaison with whoever</p> <p>21 needed to be spoken with in relation to the management</p> <p>22 of internal security?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. Did that prohibit the liaison team or anyone else who</p> <p>25 might have that particular role from liaising about what</p> <p style="text-align: center;">Page 112</p>

<p>1 we have called the outer security?  2 <b>A. No, it didn't.</b>  3 Q. Finally, just this: and again, it is more of a security  4 issue but you were asked questions about it, so perhaps  5 we can just understand your views on some of these  6 points.  7 The attack is likely to have occurred in the way  8 that we have broadly discussed with terrorists managing  9 to get through different points and get to a point close  10 to In Amenas. I think on a few occasions you said it  11 was surprising that they would be able to do that  12 without being stopped at different points. I just want  13 to understand, it is not just that they weren't stopped  14 at different points, but that they weren't spotted at  15 different points as well; is that right?  16 <b>A. Yes.</b>  17 Q. If, for example, getting right to a point 10 kilometres  18 away from In Amenas, they had been spotted by the  19 Gendarmes at La Recule, then that would, even if they  20 had not been able to stop the terrorists, that would  21 have enabled the signal or the warning to be  22 disseminated back to the camp and for the Gendarmes to  23 be mobilised and try and provide whatever protection  24 they could provide?  25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 113</p>	<p>1 Q. I just want to consider that with you. There are  2 obviously two types of people who could be positioned at  3 the gates with arms. One are civilian guards who are  4 armed and the other are potentially Gendarmes, yes?  5 <b>A. Yes.</b>  6 Q. Let us just deal with civilian armed guards. It was the  7 view held by BP and Statoil, maybe Sonatrach as well,  8 that it was not desirable to have armed guards within  9 the facility or at the facility; is that right?  10 <b>A. Yes.</b>  11 Q. And there were a number of reasons that were taken into  12 account and you have rehearsed those, so I won't cover  13 those again with you. But they were real risks and  14 concerns that you held?  15 <b>A. Yes.</b>  16 Q. They posed by themselves real risks of harm to people  17 who would be working in and about that facility?  18 <b>A. Yes.</b>  19 Q. Those civilian guards would not be guards who would be  20 under the control of the JV as such. They would,  21 certainly by this stage, have necessarily been people  22 under the control of SSI and through Sonatrach and the  23 other routes that we have discussed?  24 <b>A. Yes.</b>  25 Q. Did you know whether expat personnel could have arms?</p> <p style="text-align: center;">Page 115</p>
<p>1 Q. The checkpoint at La Recule was manned by JOC Gendarmes?  2 <b>A. Yes.</b>  3 Q. And Gendarmes with military equipment, weaponry?  4 <b>A. Yes.</b>  5 Q. Do you have any idea of the number of Gendarmes and the  6 sort of equipment?  7 <b>A. No.</b>  8 Q. They would then, if the terrorists managed to get  9 through that part of the protection without being  10 spotted, without being stopped, they would obviously get  11 to the point where at VCP1 there is potentially a guard  12 but not an armed guard and not a Gendarme?  13 <b>A. That's correct, yes.</b>  14 Q. If they've got past the checkpoint at La Recule manned  15 by Gendarmes with military equipment, in order to  16 provide any additional protection at VCP1 you would need  17 to have at least a similar size of Gendarmerie or  18 possibly greater with similar or if not greater weaponry  19 just a few kilometres further away?  20 <b>A. Yes.</b>  21 Q. At the gates at the facility the proposal was put to  22 you, and I think in fact the learned coroner asked you,  23 would there be a disadvantage in having armed guards of  24 some sort at the gates of the facility?  25 <b>A. I was asked that, yes.</b></p> <p style="text-align: center;">Page 114</p>	<p>1 <b>A. I do know and they cannot. It's illegal in Algeria.</b>  2 Q. So having civilian armed guards at the gate would not  3 certainly have been something that you would have wanted  4 or the JV would have wanted?  5 <b>A. That's correct, yes.</b>  6 Q. So far as Gendarmes are concerned, do we understand this  7 correctly, and I can take you to various documents which  8 seem to say this, that the deployment of the Gendarmes,  9 their positioning, their locations, the weaponry they  10 were to be provided with, was not something that the JV  11 could dictate?  12 <b>A. That's correct.</b>  13 Q. That that was for the military authorities for  14 themselves to determine?  15 <b>A. Yes.</b>  16 Q. And that was to be determined as far as it was  17 understood by taking into account obviously the risks  18 and the knowledge that the Algerians have of fighting  19 terrorism?  20 <b>A. Yes.</b>  21 Q. But just work through this scenario with me. If the  22 terrorists had managed to pass through the border  23 undetected, through the military zone and the various  24 checkpoints and the patrols that are being carried out  25 in the military zone, get past the checkpoints within</p> <p style="text-align: center;">Page 116</p>

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<p>1 the Gendarmerie protected zone, past La Recule and any 2 other checkpoints that they may have had to pass through 3 and get to the gate of the facility, if there was one or 4 two armed guards standing in position at the gates do 5 you think that would have made any potential difference 6 to the horrible outcome that ensued? 7 <b>A. Absolutely no difference.</b> 8 Q. So again, trying to be realistic about this and trying 9 to work through what the options are that have been put 10 to you. In other side to provide some significant 11 protection over and above that which is provided in the 12 various bits of the security rings we have discussed 13 there would be need to be a much larger body of some 14 form of armed guards, Gendarmerie? 15 <b>A. It would have to be larger and it would have to have 16 weaponry which would be able to repel it and civilians 17 are not allowed to have that type of weaponry.</b> 18 Q. In addition, of course we know that these terrorists 19 came in and approached that entrance into the BdV? 20 <b>A. Yes.</b> 21 Q. There is another entrance as well, isn't there? 22 <b>A. Yes.</b> 23 Q. That too would presumably, if the same approach was 24 being taken, need to be protected in the same way? 25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 117</p>	<p>1 THE CORONER: Mr Collins, thank you very much indeed. 2 I think you are coming back, aren't you, at a later date 3 to help us with another aspect. 4 <b>A. Yes.</b> 5 THE CORONER: Thank you very much indeed for the time you 6 have given us now. I am very grateful. 7 <b>A. Thank you.</b> 8 MS GERRY: Sir, just before the witness is released. 9 Reference has been made to this risk assessment that was 10 done in December 2012 prior to the remanning. I don't 11 believe that has been provided, unless I am wrong? 12 MR POPAT: I think my learned friend is right. I don't 13 think it has been provided. I am sorry, I did mean to 14 just raise this with Mr Collins in case there was 15 a misunderstanding. But Mr Collins deals with this at 16 paragraph 76 of his witness statement and we can 17 certainly make enquiries to see if the risk assessments 18 can be located but so it is clear, as he says in that 19 paragraph, these are health and safety risk related 20 assessments and expressly he says "monitoring of the 21 situation continued to be carried out and specific 22 security related risk assessments concerning 23 recommencing work et cetera were not required." 24 Because they were part of the ongoing security risk 25 assessments. So I understand, and I think this is what</p> <p style="text-align: center;">Page 119</p>
<p>1 Q. Same at the CPF? 2 <b>A. Yes.</b> 3 Q. No living quarters in the CPF; is that right? 4 <b>A. That's correct.</b> 5 Q. But people working in the CPF? 6 <b>A. People working, yes.</b> 7 Q. Potential for very, very serious explosions if terrorist 8 activities are undertaken in the CPF? 9 <b>A. Yes.</b> 10 Q. And how many entrances to the CPF? 11 <b>A. There is one entrance to the CPF. There may be -- as 12 far I know there is one entrance to the CPF.</b> 13 Q. So if a sufficient number of Gendarmes with a sufficient 14 collection of weaponry were deployed to these different 15 locations to stand static guard effectively 24 hours 16 a day in those areas, would that potentially lead to 17 a reduction in the protection provided because, unless 18 it is another large quantity of Gendarmes that are 19 deployed to do this, there would be fewer Gendarmes 20 positioned in the places where they were positioned and 21 carrying out the patrols that they should be carrying 22 out of the whole zone? 23 <b>A. Yes.</b> 24 MR POPAT: Thank you, Mr Collins. 25 <b>A. Thank you.</b></p> <p style="text-align: center;">Page 118</p>	<p>1 Mr Collins was referring to yesterday, these are health 2 and safety type assessments to work out where it would 3 be safe for people to work and the risks that they might 4 otherwise face to their safety, as opposed to their 5 security. 6 THE CORONER: Yes. Do you want -- 7 MR POPAT: If those are available we can try. 8 THE CORONER: Do you want efforts to be made at least to see 9 if they can at least be looked at? 10 MS GERRY: Yes, please. 11 THE CORONER: Do you mind? I am very grateful. Thank you 12 very much. 13 That is all. You are free to go? 14 <b>A. Thank you.</b> 15 <b>(The witness withdrew)</b> 16 THE CORONER: I have to finish at 3 o'clock today and the 17 next witness, Mr Battram, is I think only available 18 today. My understanding is that all the interested 19 persons have indicated that if we were to start at 1.45 20 that the witness would be completed by 3 o'clock. If 21 there is any risk that that estimate might be wrong then 22 plainly it would be better if we actually start the 23 witness now because if the estimate is correct we will 24 finish by 2.30 or whatever which is not too far away but 25 if the estimate is wrong then it means you have a bit of</p> <p style="text-align: center;">Page 120</p>

<p>1 leeway and everybody has the opportunity to ask their 2 the questions they want. If everybody is confident that 3 if we break off now and start again at 1.45 that we will 4 finish by 3 o'clock. If everybody is absolutely sure 5 about that then that's what we'll do. If any one person 6 has what I should have thought was very good reason for 7 being highly doubtful about that, then we need to carry 8 on. But there we are. I appreciate if we do that that 9 it is a long stretch for the family. I do appreciate 10 that. But I suspect if you had the choice you would say 11 you would rather go on and not run the risk of running 12 out of time for questions to be asked. But let us see, 13 Mr Ritchie.</p> <p>14 MR RITCHIE: I have a tiny doubt, sir.</p> <p>15 THE CORONER: All right, we'll carry on then. So 16 Mr Battram.</p> <p>17 MR PETER BATTRAM (sworn) 18 Questions from MS DOLAN.</p> <p>19 THE CORONER: Mr Battram, I am sorry about that because 20 I expect you were anticipating some lunch now too. Are 21 you able to carry on?</p> <p>22 <b>A. I was expecting to have some lunch and I was just saying 23 to my colleague over there if you require me for other 24 days I'm quite happy to attend.</b></p> <p>25 THE CORONER: All right, but are you happy to make a start</p> <p style="text-align: center;">Page 121</p>	<p>1 Q. I think when you were at the site you made some 2 enquiries of your other colleagues about vetting of 3 Algerian workers?</p> <p>4 <b>A. I did. Yes. After the HSE induction I waited until the 5 room had cleared and then I asked the chap who was 6 running the induction if the same security measures 7 applied to all nationalities because I had had to get 8 a work visa, a work permit, a desert pass, a base pass 9 a camp pass and a CPF pass and I was told that it wasn't 10 a problem, that that was dealt with by the Algerians and 11 they were all okay. In fact, they weren't vetted, to 12 answer your question.</b></p> <p>13 Q. You say they weren't vetted?</p> <p>14 <b>A. As far as I understand it, they weren't vetted.</b></p> <p>15 Q. Why did you think they weren't vetted?</p> <p>16 <b>A. Because they didn't need all the passes that I needed.</b></p> <p>17 Q. Just to be clear what you are saying. They may not have 18 needed the same passes but did you have information that 19 Algerians were not vetted in any way?</p> <p>20 <b>A. Well, they would have been vetted for their technical 21 ability, for the job that they were doing.</b></p> <p>22 Q. We have heard other evidence that the Algerian 23 authorities carried out some vetting of their staff. We 24 haven't had any detail of what that was. Just to be 25 clear --</p> <p style="text-align: center;">Page 123</p>
<p>1 now?</p> <p>2 <b>A. Yes, sure.</b></p> <p>3 MS DOLAN: Good afternoon, Mr Battram, my name is Bridget 4 Dolan and I am asking questions on behalf of the 5 coroner. Can you give us your full name please?</p> <p>6 <b>A. Yes, Peter William Battram.</b></p> <p>7 Q. And I think you at one time worked at In Amenas in 8 contract and finance management?</p> <p>9 <b>A. That's exactly correct. I was there from January 10 until July 2012.</b></p> <p>11 Q. And was that a continuous period you were there 12 from January to July or did you have --</p> <p>13 <b>A. No it's the normal process in the desert of working 14 three weeks on and three weeks off. So I had four trips 15 to Algeria.</b></p> <p>16 Q. And when you first went there in January 2012 did you 17 have any induction when you arrived at the site?</p> <p>18 <b>A. I did. I had an HSE induction, yes.</b></p> <p>19 Q. What did that involve?</p> <p>20 <b>A. It told me where to get my boots and helmet and 21 protective glasses and it did mention that there would 22 be alarms set off and a continuous alarm meant for us to 23 go to a collection point and an intermittent alarm meant 24 we stayed where we were or it may have been the other 25 way round, I'm not quite sure.</b></p> <p style="text-align: center;">Page 122</p>	<p>1 <b>A. I think it is the same in all employment processes that 2 people apply for a job and if they're considered to be 3 suitable by the people that interview them, they get the 4 job.</b></p> <p>5 Q. Can I just -- you said I think. Do you know that the 6 staff weren't vetted or are you assuming they weren't?</p> <p>7 <b>A. I'm assuming they weren't because a lot of the people 8 that worked with me were not qualified to do the job 9 that they were doing.</b></p> <p>10 Q. You are talking about --</p> <p>11 <b>A. Professional and technical.</b></p> <p>12 Q. -- ability in the role rather than security vetting?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. When you were at In Amenas did you see Gendarmes present 15 when you went about your daily work?</p> <p>16 <b>A. There was a small gate post about a kilometre from the 17 entrance to the BdV which typically would have three or 18 four Gendarmes at it. Heading towards the CPF there was 19 no evidence of Gendarmes.</b></p> <p>20 Q. Did you witness Gendarmes patrolling in any way?</p> <p>21 <b>A. I never saw any patrolling.</b></p> <p>22 Q. You provided a witness statement to the enquiry in which 23 you said that the fence didn't seem well patrolled but 24 you didn't suggest in that that the fence wasn't 25 patrolled. Did you see patrols on some occasions?</p> <p style="text-align: center;">Page 124</p>

1 **A. Well i am not awake for 24 hours a day and I'm not at**  
 2 **the base camp for 24 hours a day so I couldn't say**  
 3 **whether it was patrolled intermittently or whether it**  
 4 **was patrolled regularly but me personally I didn't see**  
 5 **it being patrolled.**  
 6 Q. Had you attended other sites in Algeria in the  
 7 petrochemical industry?  
 8 **A. I hadn't attended other sites but I subsequently ended**  
 9 **up at Hassi Messaoud for a few weeks because I was**  
 10 **unable to get to In Amenas due to the industrial action**  
 11 **in July and that site was far, had a far higher level of**  
 12 **protection than the desert site. It had a double**  
 13 **entrance bay, a holding bay for vehicles entering the**  
 14 **site. The door had to close behind that before the door**  
 15 **in front opened. Whereas at In Amenas it was just**  
 16 **a single barrier across the entrance.**  
 17 Q. We have heard evidence that at In Amenas there was in  
 18 fact a double fence line?  
 19 **A. Yes, a double fence line.**  
 20 Q. And at the entrance to the BdV there were two gates, one  
 21 which allowed vehicles into the parking area and then  
 22 another gate between that parking area into the inside  
 23 of the BdV?  
 24 **A. Yes, that's true.**  
 25 Q. Is that correct?

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1 **A. The actual entrance was just a single drop down barrier**  
 2 **with a little crocodile but the crocodile was big enough**  
 3 **for a 60-foot bus to drive through.**  
 4 Q. So I can be clear, are you saying the gates that we have  
 5 heard of weren't present or they were?  
 6 **A. There's a gate that you walk through to go into the**  
 7 **camp. That was the inner gate and then there was the**  
 8 **outer gate which was just a single barrier which was the**  
 9 **parking zone.**  
 10 Q. So --  
 11 **A. So there was a parking zone followed by a pedestrian**  
 12 **zone.**  
 13 Q. We have had described to us a metal gate which slides  
 14 backwards and forwards at the end?  
 15 **A. Not one that I went through.**  
 16 Q. You didn't notice that?  
 17 **A. Well I would have noticed it.**  
 18 Q. I wonder if I could just have the --  
 19 THE CORONER: Can you just tell me, what do you mean by  
 20 crocodile? I'm sorry.  
 21 **A. At the entrance there was some concrete blocks put in**  
 22 **the road so that the vehicles would have to go in a zig**  
 23 **zag crocodile.**  
 24 THE CORONER: Like a chicane. They couldn't go straight?  
 25 **A. Like a chicane, yes, but that crocodile was big enough**

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1 **for the bus which ran between the airport and the base**  
 2 **camp to get in and that was a 60 seater coach.**  
 3 THE CORONER: And it might depend how sharp it was how much  
 4 it would slow it down?  
 5 **A. Yes, if you can get a 60 seater coach through there it**  
 6 **is fairly easy to get most other things through there.**  
 7 MS DOLAN: Mr Battram, an image is going to come up on the  
 8 screen which we have understood was the entrance to the  
 9 BdV.  
 10 **A. Yes, the one on the bottom right-hand side.**  
 11 Q. You see two other pictures on the right-hand side of  
 12 that picture and if you look at the bottom one of those,  
 13 is that the area that you are describing as the  
 14 crocodile?  
 15 **A. Yes.**  
 16 Q. And we can see beyond that there appears to be something  
 17 which looks like it may be a gate which slides forwards  
 18 and backwards?  
 19 **A. Well, the gate at the -- you can see the barrier is up**  
 20 **at the moment in that picture.**  
 21 Q. This is a picture taken post the incident we understand,  
 22 but just the gate -- you said there wasn't a gate. Does  
 23 that help jog your memory when you look at that picture?  
 24 **A. Well, I can see the entrance is the bottom right-hand**  
 25 **picture and I can see the drop down barrier that's in**

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1 **the upright position at the guardhouse and there's**  
 2 **a sliding gate there.**  
 3 Q. So --  
 4 **A. But that was usually open.**  
 5 Q. When you say usually open. So you do accept there was  
 6 a sliding gate?  
 7 **A. Yes, there is a sliding gate there. But I never saw it**  
 8 **closed and I went back to the base camp several times**  
 9 **during the day to look at projects that were around the**  
 10 **site.**  
 11 Q. So how often a day would you need to pass through the  
 12 gate -- first of all, is this the entrance gate into the  
 13 BdV?  
 14 **A. Yes.**  
 15 Q. How often a day in your normal working day would you  
 16 pass through that gate?  
 17 **A. A minimum of four times, so that's going to work in the**  
 18 **morning, returning to lunch, returning to work in the**  
 19 **afternoon and coming back in the evening. Maximum 6 to**  
 20 **8 times, depending on whether I was visiting the ongoing**  
 21 **projects inside the BdV.**  
 22 THE CORONER: Were you always in a vehicle or on foot or  
 23 a mixture?  
 24 **A. Generally in a vehicle: sometimes driving myself,**  
 25 **sometimes being driven by others.**

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<p>1 MS DOLAN: We have heard evidence already that in the 2 morning rush hour, as I called it when many people were 3 travelling between the BdV and the CPF this gate may 4 have been left open and so that a procession of cars 5 which could come through it. 6 <b>A. Mmm.</b> 7 Q. Is it that you were passing through at those busy times 8 and it was left open? 9 <b>A. Yes, I did pass through at those busy times but as 10 I have intimated I also went back to the base camp for 11 looking at ongoing projects there and sometimes when 12 I approached the camp the gate was open and sometimes 13 when I approached the camp the gate was closed.</b> 14 Q. And you say "sometimes". How frequently would it be 15 open when you came to it when it wasn't one of these 16 rush hour periods? 17 <b>A. As far as I can remember it was a 50/50 gamble as to 18 whether the gate would be open. I didn't keep records 19 of it. I just remember that it wasn't always closed.</b> 20 THE CORONER: Can I just ask this: you may not be able to 21 remember it and if you can't just say so. But if it was 22 open, suppose you were coming back not at the beginning 23 or end of the day, rush hour time, can you remember, if 24 you came back at some other time and the gate was open, 25 was that because or was there at that time a whole queue</p> <p style="text-align: center;">Page 129</p>	<p>1 <b>course have proper terminology for this from Mr Cobb.</b> 2 <b>We have the integrated camp, which is the whole thing,</b> 3 <b>and we have the gate to the integrated camp, and then we</b> 4 <b>have the parking area and then we have the BdV. We</b> 5 <b>colloquially call the whole thing the BdV. But</b> 6 <b>correctly it seems from Mr Cobb that the BdV is that</b> 7 <b>internal area and that has the gate that counsel to the</b> 8 <b>enquiry was talking about earlier. I don't know if</b> 9 <b>Mr Battram is familiar with that terminology but</b> 10 <b>certainly we should all be talking about the same thing.</b> 11 THE CORONER: Can you help me, just look at this picture, 12 they're really hard to see I am afraid, if you look at 13 this picture can you see that the photographs on the 14 right, do you see are marked A and B? 15 <b>A. Yes.</b> 16 THE CORONER: And then we have just about, you can make out 17 a red line coming from each picture. Do you see, going 18 across to the, as it were, bigger image on the left? 19 <b>A. Yes.</b> 20 THE CORONER: Can you see where A and B are marked there? 21 <b>A. Yes.</b> 22 THE CORONER: And then if you come down the photograph on 23 the left from A and B, just imagine you are just coming 24 down it, down the picture, then you have -- you can see 25 the car park or the car parks. Is that right?</p> <p style="text-align: center;">Page 131</p>
<p>1 of vehicles? Do you understand what I am asking. 2 <b>A. Yes, I do understand what you are asking.</b> 3 THE CORONER: Or were you the only one coming? 4 <b>A. I would approach it and I would see the barrier was down 5 but the gate was open. That's typically what I would 6 see and then sometimes I would approach and the gate 7 would be closed and the barrier would also be down, but 8 when I approached the camp I generally wasn't in the 9 queue of traffic. It was just generally my car on its 10 own.</b> 11 MS DOLAN: Was your car passing through the gate into the 12 BdV area? 13 <b>A. Yes, it went into the parking zone.</b> 14 Q. You are talking about into the parking zone? 15 <b>A. Yes, and it also -- I also took the car into the BdV 16 area if I was travelling down with some documents or 17 meeting material to meet one of the contractors.</b> 18 Q. Can I just then be specific about which gates we are 19 talking about being left open and which closed? 20 <b>A. Right, the gate.</b> 21 Q. We have two gates. The external and internal gate? 22 <b>A. The gate on the outer fence was sometimes open and the 23 gate on the inner fence was always closed and that had 24 to be happened opened.</b> 25 <b>MR OWEN-THOMAS: Forgive me for interrupting. We do of</b></p> <p style="text-align: center;">Page 130</p>	<p>1 <b>A. Yes, that's correct.</b> 2 THE CORONER: And then you come further down and it looks 3 like there is a road that you cross, do you see? 4 <b>A. That's correct, yes.</b> 5 THE CORONER: And then just below that there are a couple of 6 boxes which might have -- could be -- 7 <b>A. The first one on the right of that arrow is the security 8 liaison office.</b> 9 THE CORONER: Can you see the letters D and N? 10 <b>A. Yes.</b> 11 THE CORONER: Can you see those? 12 <b>A. Yes.</b> 13 THE CORONER: So these gates we are talking about, the ones 14 we can see in the pictures those are the ones, is this 15 right, right at the top of the left-hand photograph, 16 yes? 17 <b>A. Yes.</b> 18 THE CORONER: If you go through that gate and you come down 19 you are going to be passing the car park, correct? 20 <b>A. That's correct, yes.</b> 21 THE CORONER: Then you will be crossing a road. 22 <b>A. Yes.</b> 23 THE CORONER: And then once you have crossed that road is 24 there another, at least what I'll call a gate area? 25 <b>A. Yes, there should be a gate there at the bottom of the</b></p> <p style="text-align: center;">Page 132</p>

<p>1 <b>car park where the car park line is just above the D and</b>  2 <b>the N.</b>  3 THE CORONER: First of all, just so we are clear what you  4 were telling us about, if you look at picture -- the  5 bottom right-hand picture here, picture B, you see that?  6 <b>A. Yes.</b>  7 THE CORONER: There's what we have been told and I think you  8 have confirmed is a sliding gate. Can you see that on  9 the right-hand side? It is in the open position?  10 <b>A. Yes.</b>  11 THE CORONER: And you tell me, I don't know, is that the one  12 you are telling us about that it was 50/50 whether it  13 was open or closed, not at the beginning or the end of  14 the day?  15 <b>A. That's exactly correct. That's the gate from the access</b>  16 <b>road.</b>  17 THE CORONER: Right.  18 <b>A. And --</b>  19 THE CORONER: Now.  20 <b>A. The picture A is just taken at the beginning of the</b>  21 <b>crocodile and the picture B is taken at the end of the</b>  22 <b>crocodile by the barrier and the gate.</b>  23 THE CORONER: That's right. It has just gone further  24 towards the gate, hasn't he, the photographer?  25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 133</p>	<p>1 <b>you came on to the camp you left your T card behind and</b>  2 <b>when you left the camp you picked your T card up and</b>  3 <b>went to the CPF.</b>  4 THE CORONER: Do we have a photograph of that gate anywhere?  5 Let us just see because we have -- what did you call,  6 you know the one we have got two pictures of,  7 Mr Battram?  8 <b>A. Yes.</b>  9 THE CORONER: What did you call that gate?  10 <b>A. I would have called it the main entrance gate.</b>  11 THE CORONER: You would call that -- just pause there -- the  12 main entrance gate and then the one we may or may not  13 have a photograph of, all right, but the next one you  14 have just been telling me about, what did you call that  15 one?  16 <b>A. That is the entrance to the BdV.</b>  17 THE CORONER: I think with you at least we'll stick with  18 that terminology. Let's see if we have a picture of  19 that one.  20 MS DOLAN: Sir, it appears that we don't have an  21 unobstructed view of that but there may be a picture of  22 it with a bus parked in front of it. But the witness  23 may be able to confirm. Mr Battram, can you have a look  24 at that picture and can you tell us what we are looking  25 at there?</p> <p style="text-align: center;">Page 135</p>
<p>1 THE CORONER: That's that. If you then go through that gate  2 when it's open and you come on down the photograph on  3 the left, yes, past the car park, across the road and  4 then come to the sort of area that's D and N it looks  5 like, if my eyes are right, do you see those?  6 <b>A. Yes.</b>  7 THE CORONER: Round about there is there a gate there as  8 well?  9 <b>A. There's a gate there to allow vehicles access to the BdV</b>  10 <b>and next to the vehicle gate there would also have been</b>  11 <b>a pedestrian gate.</b>  12 THE CORONER: So there is a vehicle gate and pedestrian  13 gate?  14 <b>A. Yes.</b>  15 THE CORONER: Just tell us, please, would you, whether there  16 would be anybody, as it were, official at that gate and  17 whether the gate would be open or closed and can you  18 just help us now about that gate?  19 <b>A. Yes, that gate would always be closed. The vehicle gate</b>  20 <b>would always be closed. The pedestrian gate would be</b>  21 <b>patrolled by the security office which is right next to</b>  22 <b>it.</b>  23 THE CORONER: Right.  24 <b>A. You can see a little hut there. And that's the security</b>  25 <b>office where people would put their T card in. So when</b></p> <p style="text-align: center;">Page 134</p>	<p>1 <b>A. Yes, you are looking at the pedestrian entrance.</b>  2 Q. Obviously we can't see what's behind the bus. Can you  3 tell us what the bus is obscuring?  4 <b>A. As far as I remember, I'm just trying to see which way</b>  5 <b>this is facing.</b>  6 THE CORONER: That is what I was going ask you. Have a good  7 look at that and tell us whether the other gate you  8 were --  9 <b>A. That is facing towards the covered parking area which is</b>  10 <b>to right of the boxed parking area.</b>  11 MS DOLAN: Can we just locate that on the aerial view as  12 well please. So the covered parking area --  13 <b>A. If you look the covered car park area, the boxed car</b>  14 <b>park area.</b>  15 Q. That is C on the map?  16 <b>A. Yes, that's C on the map. If you look to the right of</b>  17 <b>that you will see a covered area. That is a covered car</b>  18 <b>parking area which you can see in the photograph you</b>  19 <b>have just shown me.</b>  20 Q. That is the long right oblong?  21 <b>A. Yes and the picture is taken approximately to the top</b>  22 <b>left-hand of the D box looking out.</b>  23 Q. So if one is standing with one's back at D looking  24 at 1 o'clock towards the covered parking area?  25 <b>A. Yes, sort of 1 o'clock, 2 o'clock.</b></p> <p style="text-align: center;">Page 136</p>

<p>1 Q. So that is what we are looking at there. So one is 2 standing --</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. -- inside the BdV looking out --</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. -- towards the car park. Does that help you tell us 7 what is hidden behind the bus? Is that the security 8 building you were talking about behind the bus or is it 9 behind the photographer?</p> <p>10 <b>A. I really can't recall what's in that particular little 11 corner because my focus was always to get through that 12 gate.</b></p> <p>13 Q. If you look at the far left of that photograph there 14 appears to be something in the fence, is that the 15 pedestrian gate you are talking about?</p> <p>16 <b>A. Yes, that's exactly it.</b></p> <p>17 THE CORONER: Where is the vehicle gate, more to the left or 18 behind the bus?</p> <p>19 <b>A. It should be behind the bus.</b></p> <p>20 THE CORONER: You think? All right.</p> <p>21 <b>A. Yes.</b></p> <p>22 MS DOLAN: And that, now we have located it, is what we are 23 calling the BdV gate and the one which in your 24 experience was usually closed?</p> <p>25 <b>A. Yes, absolutely.</b></p> <p style="text-align: center;">Page 137</p>	<p>1 THE CORONER: I can hardly see that. I am looking at this 2 picture here, the one on the screen. Is where a person 3 is on that photograph or not? Just look at the one on 4 your screen.</p> <p>5 <b>A. No, the cabin is just to the left of the photograph.</b></p> <p>6 THE CORONER: So off the photograph and to the left?</p> <p>7 <b>A. Yes, and there was a big board sitting there and that's 8 where people would put their T cards in and it was zoned 9 by which cabin you occupied on the BdV.</b></p> <p>10 THE CORONER: Thank you very much.</p> <p>11 <b>A. So it was a pretty good system from there.</b></p> <p>12 MS DOLAN: Thank you.</p> <p>13 <b>A. You're welcome.</b></p> <p>14 Q. Moving on to another topic. I think you are aware that 15 there was a drivers strike which began at the plant?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. Was that during your last --</p> <p>18 <b>A. It was the reason that I didn't make a fourth trip to 19 In Amenas. I was telephoned the day before I was 20 leaving to say that I may over night in Hassi Messaoud 21 while they worked out transport for me because there was 22 a drivers strike which was on and off.</b></p> <p>23 Q. When was that?</p> <p>24 <b>A. That was early July 20 -- whatever it is, 2012?</b></p> <p>25 Q. So just to be clear then, your last trip out to Algeria</p> <p style="text-align: center;">Page 139</p>
<p>1 Q. Although the further one, A and B on the plan which we 2 see in those smaller photographs, was the one you say 3 was 50/50 open?</p> <p>4 <b>A. Yes, and there was no access through the pedestrian gate 5 until a personnel T card had been deposited with the 6 security guard.</b></p> <p>7 Q. When you say you were bringing a car in, were you 8 bringing a car in then through this gate at D and N, the 9 BdV gate?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. Or you were only bringing a car as far as the car park?</p> <p>12 <b>A. To go and meet one of the contractors on site.</b></p> <p>13 Q. And that BdV gate when you did it approach it with the 14 car, and you were told us it was usually closed, what 15 was the process for it opening when you --</p> <p>16 <b>A. The process for that was to get out of the car to leave 17 my T card, to get back in the car and then the guard 18 would open the gate and let me in.</b></p> <p>19 Q. It would require somebody to push the gate open?</p> <p>20 <b>A. Yes.</b></p> <p>21 THE CORONER: Where is the bloke that you leave your T card 22 with, roughly where is he on this photograph? Is he out 23 of the picture?</p> <p>24 <b>A. He's in the -- if you look in the C box there's a little 25 cabin in the bottom right-hand corner of the C box.</b></p> <p style="text-align: center;">Page 138</p>	<p>1 you didn't make it as far as In Amenas, is that correct?</p> <p>2 <b>A. That's correct.</b></p> <p>3 Q. So your last trip to In Amenas finished when?</p> <p>4 <b>A. Would have finished in late May.</b></p> <p>5 Q. In 2012?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. I think when you were at In Amenas you had some concerns 8 related to emails, what was that?</p> <p>9 <b>A. Yes, it wasn't actually when I was in In Amenas. I had 10 discovered when I was in Hassi Messaoud that or I was 11 told by fellow expats that emails were being read by the 12 IT department, not only business emails but personal 13 emails as well.</b></p> <p>14 Q. Who told you that?</p> <p>15 <b>A. I can't remember the chap's name to be honest. There 16 were several people talking about the subject saying 17 that be careful what you write in emails because they're 18 all being read by the IT department.</b></p> <p>19 Q. If you say you can't remember who it was what kind of 20 position did they have, this person?</p> <p>21 <b>A. I was in Hassi Messaoud as a visitor so I didn't know 22 very many of the people there to be honest.</b></p> <p>23 Q. Just trying to get a better idea of the authority of 24 this information to you. Was this talk amongst 25 colleagues over coffee or was this somebody who worked</p> <p style="text-align: center;">Page 140</p>

35 (Pages 137 to 140)

<p>1 in IT and security at Hassi telling you this?</p> <p>2 <b>A. No, this was one of the security guys and there had</b></p> <p>3 <b>been -- they had been talking about the strike.</b></p> <p>4 <b>Obviously it was on everybody's lips and we were --</b></p> <p>5 <b>I was just told on the quiet, as people do with these</b></p> <p>6 <b>things, "be careful what you write in your emails</b></p> <p>7 <b>because all the emails are being read."</b></p> <p>8 Q. Did you raise that with anybody?</p> <p>9 <b>A. Well, I didn't because I left the next day.</b></p> <p>10 MS DOLAN: Thank you, I have no more questions for you.</p> <p>11 <b>A. Okay, thank you.</b></p> <p>12 <b>Questions from MR RITCHIE</b></p> <p>13 MR RITCHIE: Mr Battram, I represent the family of Carlos</p> <p>14 Estrada.</p> <p>15 You did either three or four tours or trips to</p> <p>16 In Amenas?</p> <p>17 <b>A. I did three trips to In Amenas and the final trip was</b></p> <p>18 <b>diverted to Hassi Messaoud.</b></p> <p>19 Q. And so if each trip was three weeks long to In Amenas</p> <p>20 you did nine weeks in effect to In Amenas?</p> <p>21 <b>A. My first trip was four weeks and the other two trips</b></p> <p>22 <b>were three weeks, so, yes, ten weeks.</b></p> <p>23 Q. Ten weeks we will call it.</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. And your impression of the induction that you gave led</p> <p style="text-align: center;">Page 141</p>	<p>1 <b>or to the BdV or the outer parking area and I would say</b></p> <p>2 <b>that 50/50 that gate was not closed.</b></p> <p>3 Q. It was hardly a security gate, was it?</p> <p>4 <b>A. There was a barrier there which stopped the car going in</b></p> <p>5 <b>but it wasn't a security gate that was actively</b></p> <p>6 <b>permanently in action.</b></p> <p>7 Q. Now, if this IA026 could be given to Mr Battram I would</p> <p>8 be very grateful. It is easier on the eyes for</p> <p>9 gentlemen of a certain age. Somewhere in front of you</p> <p>10 there is this and do you have page 5 open in front of</p> <p>11 you?</p> <p>12 <b>A. I do, yes.</b></p> <p>13 Q. Thank you.</p> <p>14 THE CORONER: Can I just ask a question, the barrier, did</p> <p>15 someone have to come out to open that or could you put</p> <p>16 that up and down from inside?</p> <p>17 <b>A. No, the barrier was open and closed manually by somebody</b></p> <p>18 <b>stepping out of the security office.</b></p> <p>19 THE CORONER: To go to the barrier itself.</p> <p>20 <b>A. To be fair to those guys they would wait for the car to</b></p> <p>21 <b>get to the barrier if it was a lone car and then he</b></p> <p>22 <b>would put it up and if there was a queue of cars going</b></p> <p>23 <b>in and out he would check people's passes before he</b></p> <p>24 <b>raised the barrier per car. So it was a bit of a slow</b></p> <p>25 <b>motion start to the day.</b></p> <p style="text-align: center;">Page 143</p>
<p>1 you to make comments to the person who gave you the</p> <p>2 induction afterwards?</p> <p>3 <b>A. That's exactly correct because I thought for, in my</b></p> <p>4 <b>experience of going to different oil and gas places in</b></p> <p>5 <b>various countries around the world it was a pretty</b></p> <p>6 <b>lightweight HSE induction.</b></p> <p>7 Q. Thank you. Now, you have also described this entrance</p> <p>8 barrier and your trips to and from. Over your ten weeks</p> <p>9 if you were going in between four and six times a day,</p> <p>10 I'm going to take an average of five, so you have got 25</p> <p>11 in and outs per week over ten weeks, that's 250 in and</p> <p>12 outs?</p> <p>13 <b>A. Yes, that would be.</b></p> <p>14 Q. Would you be comfortable with that as a sort of average</p> <p>15 of in and out?</p> <p>16 <b>A. As neither of us have logged it I think that's fair.</b></p> <p>17 Q. And you have said to Her Majesty's Coroner that other</p> <p>18 than the times when the gate is always open because</p> <p>19 there's traffic in the morning and traffic in the</p> <p>20 evening, your best recollection is it is a 50/50 about</p> <p>21 whether the front gate, the first gate in, was open or</p> <p>22 shut?</p> <p>23 <b>A. The gate would always be open in the morning. At</b></p> <p>24 <b>lunchtime coming and going and in the evening and let's</b></p> <p>25 <b>just say I had an average of one trip a day to the site</b></p> <p style="text-align: center;">Page 142</p>	<p>1 MR RITCHIE: Thank you, Mr Battram. Now, if you look at</p> <p>2 photo A on page 5, if that could be brought up on to the</p> <p>3 screen, so the top photo. The entrance to the</p> <p>4 crocodile. You see the first barrier has been clobbered</p> <p>5 there and there is a bit of metal.</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. These were taken off the event. You then look at the</p> <p>8 bottom photo and you can see there are bits of car</p> <p>9 there. Do you see those?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. And then there is a pole lying on the ground which is</p> <p>12 red and white to the right-hand side. Do you see that</p> <p>13 pole?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. Was that the barrier that was lifted up and down by the</p> <p>16 civilian SSI chaps in the hut?</p> <p>17 <b>A. Yes, that would have been on the inside of the gate.</b></p> <p>18 Q. Thank you.</p> <p>19 <b>A. Where the -- it looks like where the soldier's standing.</b></p> <p>20 Q. Yes. There is a sliding gate with a metal frame and</p> <p>21 wire mesh that is shown on the right-hand side of that</p> <p>22 photograph which is clearly open?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. And we have been told that to open and shut that</p> <p>25 a fellow would come out and it would have to be done</p> <p style="text-align: center;">Page 144</p>

<p>1 manually. So you would have to push it open and push it 2 shut?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. Do you actually remember seeing anybody doing that 5 during your 250 trips?</p> <p>6 <b>A. I certainly do. That's why I said it was about 50/50.</b> 7 <b>Sometimes I would approach that gate and it would be</b> 8 <b>open and it would just be the barrier to be lifted and</b> 9 <b>sometimes I would approach that gate and the chap would</b> 10 <b>walk out, open the gate, walk back and then open the</b> 11 <b>barrier.</b></p> <p>12 Q. Thank you. Now, these were taken after the event. Do 13 you see in the distance of photograph A, the top 14 photograph, a white bus?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. Would you have to basically drive through the first gate 17 that we have described --</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. -- straight past the car park and then in effect drive 20 through that bus to get into the BdV entrance or get 21 through the BdV entrance?</p> <p>22 <b>A. That's exactly correct.</b></p> <p>23 Q. So that white bus is parked across the BdV entrance?</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. If you look at the overview, that is the bird's eye Page 145</p>	<p>1 Q. And that gate into BdV we can see right at the back of 2 the bus it is a swing gate that a little man would have 3 to open and then push a little bit through 90 degrees 4 for your car to get in?</p> <p>5 <b>A. Yes, yes.</b></p> <p>6 Q. So it looks like what the terrorists have done is taken 7 this bus and put it across the entrance to stop the 8 military getting at them but you can't tell because you 9 didn't take the photo and you don't know the timing. 10 You described the entrance gate as the drop down 11 barrier as one which could just easily smash through. 12 That is what you wrote in your witness statement?</p> <p>13 <b>A. Yes. Well you can see from what's laying on the floor.</b> 14 <b>It is just a flimsy pole.</b></p> <p>15 Q. Did you make complaints about the security of this 16 entrance and if so to whom?</p> <p>17 <b>A. I didn't make complaints about the entrance per se.</b> 18 <b>I did mention at one of my very first Sunday meetings</b> 19 <b>that I thought the perimeter fence could be beefed up</b> 20 <b>a bit. We had some concrete blocks like the ones you</b> 21 <b>can see in this crocodile leading to the gate in</b> 22 <b>picture A that were in the precast yard.</b></p> <p>23 Q. T bars I think some people called them. What do you 24 call them?</p> <p>25 <b>A. Okay. I call them barrier blocks because they usually</b> Page 147</p>
<p>1 view, this is slightly trickier on the eyes but imagine 2 you have driven through the exterior gate, gate 1, 3 straight across the car park, do you see a white 4 rectangle in exactly the position the bus is shown 5 there?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. Is that the position of the second gate, the BdV gate?</p> <p>8 <b>A. Yes, that's the road access for maintenance and visitors</b> 9 <b>bringing supplies into the canteen, bringing materials</b> 10 <b>in for work that was going in.</b></p> <p>11 Q. So if you want to get in to BdV proper you leave the car 12 park where many people would stop and you would go 13 through that secondary gate. 14 If we can go to the photograph of the bus, forgive 15 me I don't know the reference -- 91. So what has 16 happened here then is, Mr Battram, you have driven 17 through the BdV gate, you have stopped, you have got out 18 of your car and you are now looking back at the bus 19 blocking the entrance?</p> <p>20 <b>A. That's exactly correct.</b></p> <p>21 Q. And to the left of that bus is the pedestrian entrance 22 you would have gone through if you happened to park 23 outside because you didn't need to go and get some 24 stuff?</p> <p>25 <b>A. That's correct.</b> Page 146</p>	<p>1 <b>go down the middle of a motorway. I suggested that</b> 2 <b>perhaps they could be placed around the perimeter of the</b> 3 <b>fence either between the double fence or outside.</b></p> <p>4 Q. And did George Griesdieck, your boss, accept that and 5 implement it?</p> <p>6 <b>A. He said it was none of my concern and that I should</b> 7 <b>leave that to the people that were involved in security.</b></p> <p>8 Q. On to patrols. In your ten weeks there did you see any 9 Gendarme vehicles, that is white with green on them, 10 patrolling?</p> <p>11 <b>A. No.</b></p> <p>12 Q. And you went backwards and forwards on average five 13 times -- sorry, out once, back twice, so you would have 14 been going backwards and forwards five times during the 15 day. Three in the middle of the day, one at the start, 16 one at the end?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. Something like that?</p> <p>19 <b>A. Yes. Well there were also, where I did see the</b> 20 <b>Gendarmes patrolling and I think you have to try and</b> 21 <b>balance this, is that the ongoing construction was</b> 22 <b>pipelines leading 10 to 15 kilometres into the desert</b> 23 <b>from the base camp and a lot of the sites that I visited</b> 24 <b>were on average between 10 and 20 kilometres from the</b> 25 <b>base camp and we would always see the Gendarmes</b> Page 148</p>

37 (Pages 145 to 148)

1 **patrolling in those areas where people were working.**  
 2 Q. Did they go with you when you went out into the field?  
 3 **A. Yes, they did. If -- I wasn't allowed to drive out to**  
 4 **the field. So I would have a driver and there would**  
 5 **sometimes be a patrol vehicle up ahead or behind but we**  
 6 **were always in radio contact with both the base camp**  
 7 **radio operator and the Gendarme operator and we had to**  
 8 **get permission from them before we could go out.**  
 9 Q. So zone 1 we have been told is between BdV and the CPF?  
 10 **A. Yes.**  
 11 Q. That is the metal road?  
 12 **A. Yes.**  
 13 Q. But if you were going out into the field, say, for  
 14 instance, through the VCP2, that one that heads down  
 15 below the falaise and off into the field?  
 16 **A. Yes.**  
 17 Q. Your driver would have to pick up some form of escort,  
 18 whether the escort was near or far, to go with you?  
 19 **A. Yes, that's correct.**  
 20 Q. Are those are the patrols you were talking about that  
 21 you have just described?  
 22 **A. No there were two different things. There was the**  
 23 **police escort and the Gendarme patrol. Same group of**  
 24 **people doing different jobs. The Gendarme patrol I'm**  
 25 **talking about are the ones that would patrol the**

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1 **pipelines, patrol the area of the installations that**  
 2 **were on going. And then the escorts were generally for**  
 3 **longer trips out or for trips to In Amenas.**  
 4 Q. I have it. So if you went out, for instance, along  
 5 trunk line 5 to Manifold 5 would you see patrols around  
 6 that area?  
 7 **A. Yes.**  
 8 Q. But if you went down to the southern field under the  
 9 falaise, for instance, to where other rigs were  
 10 situated, I don't know where Rig T212 was when you were  
 11 there, but if you went out there or to look at the  
 12 pipeline, trunk line 2 or 4 down there, you would have  
 13 your escort and is it in that sort of area you saw  
 14 patrols from time to time?  
 15 **A. Yes. Every part of the field that I visited I would see**  
 16 **patrols. But I didn't see them around the base camp**  
 17 **very often. And I can give you an example. We went on**  
 18 **a fact-finding mission to a shale field about 80,**  
 19 **90 kilometres south of In Amenas and on that trip there**  
 20 **were four people, let's say four of us from the JV that**  
 21 **were going there to get -- to collect information and we**  
 22 **had four policemen and eight army guys so that was**  
 23 **a total convoy of five vehicles for just the four of us.**  
 24 Q. So you were well protected by escorts when you went out?  
 25 **A. Yes.**

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1 Q. Thank you. There is mention in your witness statement  
 2 of a discussion with somebody about In Salah. Who was  
 3 that?  
 4 **A. That was somebody that I met in Hassi Messaoud when**  
 5 **I ended up there and also a chap --**  
 6 Q. You were in Hassi Messaoud having a conversation about  
 7 In Salah. And I was asking you who you had the  
 8 conversation with.  
 9 **A. Well, the first person I had the conversation with was**  
 10 **this chap called Dale Rumanda(?) and he was at In Amenas**  
 11 **when I first arrived there and I hadn't been in Algeria**  
 12 **for more than a few days and as one does you try to get**  
 13 **to know your colleagues.**  
 14 Q. How did the conversation comparing the camps for  
 15 security come about?  
 16 **A. Just general gripes that people have about places where**  
 17 **they worked. He asked me what I thought of it and**  
 18 **I said I thought the accommodation was reasonable, the**  
 19 **food was pretty good, generally speaking the facilities**  
 20 **we had for working were good. There was a good group of**  
 21 **people. For me everything, you know, it was a very good**  
 22 **first impression. I had a tremendous work induction and**  
 23 **lots of support from people, and he told me, well I'm**  
 24 **leaving for all the reasons that you have stated but the**  
 25 **opposite. I've had no support, I don't like the food**

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1 **and blah, blah, blah and then he went on about he had**  
 2 **been working at In Salah which was really well**  
 3 **protected, not, you know, in comparison with In Amenas.**  
 4 Q. Was it he who told you about the entrance to In Salah?  
 5 **A. That's correct, yes.**  
 6 Q. And what is your recollection of what he told you?  
 7 **A. My recollection was corroborated later on when I went to**  
 8 **Hassi Messaoud, that it was a double holding gate which**  
 9 **means that there is a wall with a double gate which**  
 10 **opens to allow the vehicle in and then it's behind -- in**  
 11 **front and then facing another wall and until the back**  
 12 **gate closes the front gate doesn't open.**  
 13 Q. And you mentioned other words about the construction or  
 14 the material of the gates. What were you told about the  
 15 construction or material of the gates at In Salah?  
 16 **A. Well, they were the same as Hassi Messaoud, that they**  
 17 **were solid steel gates.**  
 18 Q. I am going to come to Hassi Messaoud because you have  
 19 just mentioned it. You say it was well protected, very  
 20 secure, double holding area?  
 21 **A. Yes.**  
 22 Q. And you have just mentioned the gates, so are you  
 23 describing solid steel gates that you saw with your own  
 24 eyes at the entrance of Hassi Messaoud?  
 25 **A. I'm describing exactly what I saw at Hassi Messaoud.**

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1 Q. And walls, you have to go through the first steel gates  
 2 to get into the secure holding area where the gates shut  
 3 behind you?  
 4 **A. Yes.**  
 5 Q. Were there guards at that entrance?  
 6 **A. I don't recall guards outside but I definitely recall**  
 7 **guards inside.**  
 8 Q. Do you recall whether they had guns?  
 9 **A. I don't recall if they had guns.**  
 10 Q. You don't recall?  
 11 **A. No, I don't recall if they had guns. As far as**  
 12 **I remember none of the guards on the base camp were**  
 13 **armed.**  
 14 Q. On the base camp?  
 15 **A. At Hassi Messaoud.**  
 16 Q. As far as you remember none were armed?  
 17 **A. None were armed.**  
 18 Q. We will ask other witnesses about that.  
 19 Finally, you say that during the drivers strike the  
 20 drivers down tools. I assume that was on your last trip  
 21 in July?  
 22 **A. That's correct, yes.**  
 23 Q. So the strike we have been told may have started  
 24 in June, so it had already started by the time you got  
 25 there?

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1 **A. Well, it was -- I was phoned up by my back-to-back,**  
 2 **that's the chap that does the job when I'm not there, so**  
 3 **that the seats covered 365 per year and he phoned me up**  
 4 **a couple of days before I was due to go out for my**  
 5 **fourth rotation and said that I may well be overnighing**  
 6 **in Hassi Messaoud because the drivers were striking and**  
 7 **I may not be able to get transport from In Amenas**  
 8 **airport to the base camp.**  
 9 Q. So did you actually not get to In Amenas at all on that  
 10 final --  
 11 **A. I didn't get there at all. I was diverted directly to**  
 12 **Hassi Messaoud.**  
 13 Q. So when you say in your witness statement that the  
 14 drivers wouldn't take us to In Amenas and the police  
 15 downed tools, does that statement relate to the earlier  
 16 time that you were in In Amenas?  
 17 **A. No, that relates to the time that I went to**  
 18 **Hassi Messaoud. The reason that we couldn't go to**  
 19 **In Amenas was that the drivers had gone on strike and**  
 20 **anyway, if the drivers went on strike apparently the**  
 21 **police and the military just said, "well, if they're not**  
 22 **working we can't guard a convoy that doesn't exist."**  
 23 MR RITCHIE: Thank you very much. That is all my questions.  
 24 THE CORONER: Can you just help me with this? Do you see  
 25 this picture?

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1 **A. Yes.**  
 2 THE CORONER: I just want to make sure I understand what you  
 3 are saying. If you take that red line, do you see the  
 4 two red lines at the top which are superimposed on the  
 5 bigger picture on the left?  
 6 **A. Yes.**  
 7 THE CORONER: If you come down to the lower one of those two  
 8 red lines just below that line can you see what looks  
 9 like -- there is another line, do you see that just goes  
 10 along the top of the camp and then down the sides, can  
 11 you see that?  
 12 **A. Yes.**  
 13 THE CORONER: We heard that that was in fact -- there we  
 14 are, it is a bit clearer still, it looks more like  
 15 a dotted line there -- we heard in fact there were  
 16 blocks there, what I will call big concrete blocks, as  
 17 it were, on the outside there with, I think, small gaps  
 18 between them but certainly not big enough to get  
 19 a vehicle through.  
 20 **A. Yes, you could actually see that in one of the pictures**  
 21 **that you showed with the bus.**  
 22 THE CORONER: I just wanted to -- you remember those being  
 23 there, do you?  
 24 **A. Yes.**  
 25 THE CORONER: I misunderstood what you said.

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1 **A. What I was suggesting was that more of those could be**  
 2 **placed --**  
 3 THE CORONER: I see.  
 4 **A. -- to beef up the security because it looked a pretty**  
 5 **feeble perimeter fence to me.**  
 6 THE CORONER: Now I do understand.  
 7 **A. It's only in comparison with other places I worked.**  
 8 THE CORONER: Indeed.  
 9 Questions from MR OWEN-THOMAS  
 10 MR OWEN-THOMAS: Mr Battram, my name is Mr Owen-Thomas and  
 11 I ask questions on behalf of David Green, father of  
 12 Stephen Green. I just want to follow up with one or two  
 13 questions with your experience of the Gendarmerie. As  
 14 I understand it, you undertook a number of journeys  
 15 either being driven or driving yourself between the BdV  
 16 and the CPF?  
 17 **A. That's correct.**  
 18 Q. And this was an area in which you were allowed to drive  
 19 unescorted?  
 20 **A. Yes.**  
 21 Q. Did you ever do that journey at night?  
 22 **A. On one occasion I was late in the office and the**  
 23 **security called both the BdV security to come and**  
 24 **collect me and also for a Gendarme to come and escort**  
 25 **us. It is a distance of just under 3 kilometres.**

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<p>1 Q. So at night you were required to have an escort even in 2 that area?</p> <p>3 <b>A. We were not supposed to go out at night. There was 4 a curfew at sunset to sunrise of leaving the base camp.</b></p> <p>5 Q. Other than that occasion at night, can you tell me how 6 often you saw Gendarmes not involved in escort duties in 7 the area between the BdV and CPF?</p> <p>8 <b>A. I don't remember seeing them.</b></p> <p>9 Q. When you picked up an escort to go out beyond this area 10 how did you meet up with them? Did you meet at the gate 11 to the BdV, the gate to the CPF, halfway between?</p> <p>12 <b>A. If we look at this picture I can show you on the picture 13 exactly where. If you go to where it says A.</b></p> <p>14 THE CORONER: Let us see if we can get this one back to 15 normal rather than blown up.</p> <p>16 <b>A. And then just go slightly off the map you come to the 17 access road, turning left would be to the CPF and 18 turning right would be heading towards In Amenas and it 19 would be before the end of the base camp there was on 20 that road a police post and we would meet at that police 21 post, which was just beyond the perimeter fence. So if 22 you look at this where the image B red line comes up, 23 top to bottom, and then imagine projecting that just 24 over the -- just off the picture, there would be 25 a police post somewhere along there.</b></p> <p style="text-align: center;">Page 157</p>	<p>1 <b>MR OWEN-THOMAS: Thank you, Mr Battram, that is all I ask.</b></p> <p>2 <b>Questions from MS GERRY</b></p> <p>3 MS GERRY: Mr Battram, I am asking questions on behalf of 4 Sebastian John's family and I haven't got very many at 5 all for you.</p> <p>6 First of all, do you have your witness statement in 7 front of you?</p> <p>8 <b>A. I do, yes.</b></p> <p>9 Q. Can I just ask you this, there are two parts of it first 10 of all that I just wanted to ask you questions about. 11 The first is on page 2, your final paragraph, you deal 12 there with the issue of vetting the Algerian nationals?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. What you say is you describe how your security had been 15 checked all the way through:</p> <p>16 "I raised the question 'What about our Algerian 17 nationals? Are they vetted?' The answer given to me is 18 that they were Algerian nationals and it is none of my 19 concern."</p> <p>20 <b>A. That's absolutely correct.</b></p> <p>21 Q. And you went back and told your boss about this and he 22 said:</p> <p>23 "This is the way things work here. His back-to-back 24 was an American called George Griesdieck and told me 25 that it was none of my concern and that security is</p> <p style="text-align: center;">Page 159</p>
<p>1 <b>MR OWEN-THOMAS: Is that what we have heard called VCPI?</b></p> <p>2 <b>A. Yes, probably.</b></p> <p>3 Q. On your return when you were coming back from the field 4 visit at what point would the Gendarmes leave you?</p> <p>5 <b>A. After the VCPI.</b></p> <p>6 Q. Did you see where they went to?</p> <p>7 <b>A. Well, they would usually park up at the police post 8 there.</b></p> <p>9 Q. Did you ever see any Gendarmes patrolling the perimeter 10 of the BdV?</p> <p>11 <b>A. I didn't personally, no.</b></p> <p>12 Q. At night whilst you were in the BdV did you have cause 13 to walk about the camp after dark?</p> <p>14 <b>A. Well not really. My normal routine was either to go to 15 the gym, have something to eat and go to bed. We had to 16 be at work at 6 in the morning so there weren't really 17 late nights. And there wasn't a bar there because it 18 was a dry camp so that made me go to bed a bit earlier, 19 and generally speaking I was either in the gym or in the 20 canteen and then walking back to my cabin and that was 21 my exposure at night. So I wasn't really looking 22 outside the base camp.</b></p> <p>23 Q. Were you ever told how many Gendarmes were posted in the 24 area at the Gendarme camp?</p> <p>25 <b>A. No.</b></p> <p style="text-align: center;">Page 158</p>	<p>1 handled by the project director and himself project 2 manager."</p> <p>3 <b>A. That is exactly correct.</b></p> <p>4 Q. That is the response you got?</p> <p>5 <b>A. Yeah.</b></p> <p>6 Q. And then moving over on to page 3, again the final 7 paragraph. Here you refer to a discussion one Sunday 8 during your "matters arising" team talk, and you 9 suggested that the perimeter fence, at this meeting 10 suggested that the perimeter fence for BdV could be made 11 a bit more secure if we used those centre of the road 12 traffics and this is what you were describing earlier in 13 your evidence?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. And you again then go on to say:</p> <p>16 "Again it was dismissed by George Griesdieck who 17 told me we don't spend money on that sort of stuff."</p> <p>18 <b>A. That's absolutely right.</b></p> <p>19 Q. "I said again I thought the entrance to the camp was 20 very weakly protected. It was basically an S-shaped 21 crocodile. It was designed so you could drive a 60 seat 22 bus through it. When I raised this issue with the 23 security guys they basically said 'That's what we've 24 got'. We have to work with the Algerian military and 25 police and there was a police station only a kilometre</p> <p style="text-align: center;">Page 160</p>



1 away from BdV."  
 2 So from that was it your experience that if you did  
 3 raise security concerns and issues they were just  
 4 dismissed?  
 5 **A. Yes, it wasn't anything to do with me and I can add to**  
 6 **my statement that at the time I disagreed with that very**  
 7 **strongly and I said if I've got a security issue I'm not**  
 8 **just talking about the people here but I'm talking about**  
 9 **myself. I don't want myself to be in an insecure**  
 10 **position and I was quite angry with him actually and**  
 11 **said that I thought it was very inconsiderate that these**  
 12 **issues were not raised and not put together and it was**  
 13 **also not fair on the rest of the people that worked**  
 14 **there but I was told that it was nothing to do with me.**  
 15 Q. Can I then just ask you about the relationships between  
 16 the expats and the local staff?  
 17 **A. You certainly can.**  
 18 Q. Again, on page 2 of your statement, the final part of  
 19 your first paragraph you say:  
 20 "I did three rotations in In Amenas starting  
 21 in January and my last rotation ended in July. In the  
 22 course of my three rotations in In Amenas I saw the  
 23 cooperation between the foreign and local staff just  
 24 evaporating. My initial welcome had been very warm. It  
 25 was like you're my brother, you have come to help us but  
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1 by the time i left I felt that it was more the other way  
 2 round, we want to replace you."  
 3 **A. That was exactly my impression. When I first arrived**  
 4 **there it was a most harmonious camp. I was highly**  
 5 **impressed. I had never been on a camp where the support**  
 6 **and induction had been so good. It was first class.**  
 7 **And then the grumblings of the drivers strike started**  
 8 **and then there was the whole issue about people being**  
 9 **moved from the agency they were working for to become**  
 10 **direct employees of Sonatrach which caused a lot of**  
 11 **discomfort amongst people. And they were really trying**  
 12 **to make sure that they had jobs and rather than have an**  
 13 **expat in a job. It was more fun to have an Algerian in**  
 14 **the job and effectively long-term that's what will**  
 15 **happen. But it was definitely a change of attitude.**  
 16 **The enormously high level of cooperation had kind of**  
 17 **disappeared and it didn't make my job any harder because**  
 18 **I initiated all the things I did. So if they decided**  
 19 **not to help I did it myself.**  
 20 Q. So just to be clear, it was your experience that this  
 21 was specific feelings that were being vented towards the  
 22 expats by the foreigners?  
 23 **A. My personal experience, yes.**  
 24 Q. And just in terms of the alarm, you were told about the  
 25 intermittent alarm and the continuous alarm. One being  
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1 a fire alarm and one being a security alarm. You said  
 2 in your evidence you were confused as to which was  
 3 which. Is it that you are confused now because you  
 4 can't recollect or were you confused at the time?  
 5 **A. No I'm confused now because I can't recall. I do recall**  
 6 **that we had zones that we had to meet at if the alarm**  
 7 **went off and the alarm was tested a couple of times**  
 8 **a week. The time was never advertised. Sometimes it**  
 9 **was during the 12 hours of working time and sometimes it**  
 10 **was in the 12 hours of nonworking time and there were**  
 11 **always muster points, everybody had a muster point to go**  
 12 **to and there were two alarms. One was the constant**  
 13 **alarm and one was the intermittent and one told us to go**  
 14 **to the muster point and one told us to stay where we**  
 15 **were. To be honest I don't remember which way round it**  
 16 **was.**  
 17 Q. I just wanted to find out where the confusion was about  
 18 that. That is fine. Thank you very much.  
 19 Just two final matters. Firstly, I think the last  
 20 time you were in In Amenas was late May, is that right?  
 21 **A. That's right, yes.**  
 22 Q. It would seem from the evidence we have heard so far  
 23 that at that time the guards were being supervised  
 24 directly by the JV's liaison team?  
 25 **A. Yes.**  
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1 Q. And there came a time it was changed over to the SSI,  
 2 what we have referred to as the SSI. Was that something  
 3 you were aware was happening?  
 4 **A. No, at the time I was there. We had the -- there were**  
 5 **a couple of expats that were in charge of the liaison**  
 6 **between the Gendarmerie, the military and the base camp**  
 7 **guards and they organised every escorted trip, whether**  
 8 **it be to the field or whether it be to the airport.**  
 9 Q. Just to be clear, your experience was at a time when it  
 10 was the JV liaison team?  
 11 **A. Absolutely correct.**  
 12 Q. Just finally, sorry, I apologise, if I could ask that  
 13 the picture NSA23, page 2 to be put up. This is an  
 14 aerial photo taken a bit further back than the one we  
 15 were looking at last time and I think to the top  
 16 right-hand corner is what we have been referring to as  
 17 VCP1 which I think is where you were describing?  
 18 **A. That is absolutely correct. That is the access road.**  
 19 **So come out of the base camp. Right was the direction**  
 20 **of In Amenas and left was the CPF.**  
 21 Q. Can I just ask you, if you go to the right, so if you  
 22 are coming from the VCP going towards the CPF, sticking  
 23 with the tarmac road there is the first left which takes  
 24 you to the BdV gates?  
 25 **A. Yes.**  
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1 Q. And beyond that there is another left. Do you see that?  
 2 **A. Yes.**  
 3 Q. Going down. Are you aware what was there in terms of  
 4 access control or how you -- who and how you might get  
 5 in?  
 6 **A. To be honest I never used that access and I didn't**  
 7 **really pay a lot of attention to it.**  
 8 MS GERRY: I can ask another witness. Thank you, I have no  
 9 further questions.  
 10 Questions from MS GOLLOP  
 11 THE CORONER: Take the time you need because we are not  
 12 under pressure.  
 13 MS GOLLOP: Mr Battram, I am asking questions on behalf of  
 14 Stephen Green's widow.  
 15 **A. Okay.**  
 16 Q. Were you interviewed by a representative of Statoil for  
 17 the purposes of their investigation report?  
 18 **A. No.**  
 19 MS GOLLOP: Thank you.  
 20 MR LAIDLAW: No questions, thank you.  
 21 Questions from MR POPAT  
 22 MR POPAT: Mr Battram, I ask some questions on behalf of BP  
 23 and I won't keep you very long at all. Just so that  
 24 I have understood some things because I am not sure the  
 25 answers were the same when you answered the same

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1 question put by different people. And some are just  
 2 very small points.  
 3 At one stage I think you referred to your induction  
 4 that you received when you came as not very good and  
 5 then on another occasion you referred to it as very  
 6 good?  
 7 **A. There's two different things there. One was the HSE**  
 8 **induction and one was the work induction. The HSE**  
 9 **induction was lightweight. The work induction was**  
 10 **excellent.**  
 11 Q. I just want to be clear. You had two inductions. One  
 12 was what you have called in your statement, I think,  
 13 a security induction and one was a general induction?  
 14 **A. Yes, it was all part and parcel of the same day and it**  
 15 **was an HSE induction and a security induction. It was**  
 16 **all moulded together. It was just part of -- also**  
 17 **giving us this picture of the camp so you knew where**  
 18 **everything was and a picture that's a bit further back**  
 19 **than the one we've got on the screen to show everybody**  
 20 **how to get to this and how to get to that. So that was**  
 21 **the familiarisation and induction into camp life and the**  
 22 **other induction is obviously the job induction. So I'm**  
 23 **sorry if I haven't made it clear. In my head there are**  
 24 **two.**  
 25 Q. Exactly and I just wanted to make sure we understood

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1 which you were referring to. In the induction when you  
 2 are shown the photograph and the other photograph and  
 3 you are shown about different things, you are told about  
 4 what to do in the event of an emergency, the different  
 5 sirens that will sound, muster points in the event of  
 6 fire and various other things of that sort, all that is  
 7 explained to you and shown to you?  
 8 **A. Yes, and there was one other point that hasn't been**  
 9 **raised that, I think it's in my witness statement,**  
 10 **I can't remember, but the -- we were told that in the**  
 11 **event of hearing gunfire we were to just stay where we**  
 12 **were until we were contacted. That was about it from --**  
 13 **there was no hostile training, there was just**  
 14 **straightforward, if you hear guns stay where you are.**  
 15 **Hide under the bed or something.**  
 16 Q. And lock the rooms?  
 17 **A. Something like that, yes. It wasn't very satisfactory.**  
 18 Q. The second point that arose which again wasn't  
 19 necessarily clear to me is when you were answering  
 20 questions that Ms Dolan was asking you about the time of  
 21 the induction and you raising your queries about  
 22 Algerian nationals, you said you were told by somebody  
 23 that they were not vetted and then when you were asked  
 24 questions by Ms Gerry who asked you questions just  
 25 a little while ago you were taken to a passage in your

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1 witness statement which was provided back in October of  
 2 last year where in fact you say you asked somebody about  
 3 the security vetting -- sorry, you asked somebody about  
 4 Algerian nationals and whether they were vetted and you  
 5 were told that they were Algerian nationals and it's  
 6 none of my concern?  
 7 **A. It was none of my concern.**  
 8 Q. So you see the difference?  
 9 **A. I do, yes.**  
 10 Q. You weren't saying in your statement that you had been  
 11 told that the Algerians were not vetted?  
 12 **A. No, that's correct.**  
 13 Q. So it is none of your concern was the answer you  
 14 received?  
 15 **A. The official answer I received was that it was none of**  
 16 **my concern. The answer over coffee was the Algerians**  
 17 **are not vetted.**  
 18 Q. The amount of time you were actually at In Amenas, you  
 19 dealt with this in your statement and rather than trying  
 20 to make it a memory test for you now some time later can  
 21 I just remind you of some of the things you explained.  
 22 You did three rotations. The last one ended  
 23 in July 2012. Each rotation would be 21 to 28 days max  
 24 at a time?  
 25 **A. Mmm.**

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<p>1 Q. I don't think you were sure exactly how many days you 2 were there on any particular rotation, but it is right 3 to say that in total therefore you were at In Amenas for 4 about 60 to 70 days in total?</p> <p>5 <b>A. Mmm.</b></p> <p>6 Q. And during that time when you were staying in any 7 quarters you were staying in quarters in the BdV?</p> <p>8 <b>A. That's correct.</b></p> <p>9 Q. And your ordinary course of work would take you from the 10 BdV up to the CPF?</p> <p>11 <b>A. That's correct.</b></p> <p>12 Q. And you would do that obviously in the morning and you 13 do it when you would come back and on occasion you would 14 have a cause to make that journey more than once or 15 twice during the course of the day?</p> <p>16 <b>A. That's correct.</b></p> <p>17 Q. You would also during those 60 or 70 days, whatever it 18 works out at, go out of the site and to different 19 locations out and about?</p> <p>20 <b>A. That's correct, yes.</b></p> <p>21 Q. The questions you were asked by Mr Owen-Thomas related 22 to whether or not you had seen any Gendarmes really on 23 your journey between the CPF and the BdV and I think you 24 said at one stage "not really" and on another occasion 25 you said you didn't see them. Can I take it, we don't</p> <p style="text-align: center;">Page 169</p>	<p>1 the concern you are raising. There were T bars, these 2 concrete barriers all the way round the perimeter of the 3 BdV?</p> <p>4 <b>A. I don't recall them being all the way round.</b></p> <p>5 Q. All right, you saw the photograph that we looked at and 6 the coroner showed you?</p> <p>7 <b>A. Yes, that showed the front elevation. That is at the 8 back of the parking zone.</b></p> <p>9 Q. At least there, and we can see on the photograph 10 ourselves where the barriers go round and we can see it 11 blown up if need be, but those barriers went around the 12 perimeter?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. There was then a fence topped with razor wire?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. And then a space and then another fence topped with 17 barbed wire or it may have been the other way round?</p> <p>18 <b>A. Mmm.</b></p> <p>19 Q. And one of the things you were identifying, you say, was 20 the benefit of having more concrete barriers where the 21 fence or the first fence was, I think, is that right?</p> <p>22 <b>A. Yes, exactly right.</b></p> <p>23 Q. And that is the point you raised, you say, with 24 Mr Griesdieck and you say he dismissed it?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 171</p>
<p>1 need to quibble about whether you saw them once or not 2 but you don't recall seeing the Gendarme?</p> <p>3 <b>A. I don't recall seeing them. Where I do recall seeing 4 them is out in the field.</b></p> <p>5 Q. You have explained all that and I am not going to go 6 through that again. What you are referring to there is 7 the journey from the CPF to the BdV or the other way 8 round?</p> <p>9 <b>A. On the tarmac road.</b></p> <p>10 Q. Just on the tarmac road?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. Where you would in fact pass the Gendarme camp on your 13 left, is that right, yes?</p> <p>14 <b>A. Mmm.</b></p> <p>15 Q. You mentioned that I think at one stage you thought that 16 frankly, put simply, the perimeter could do with more of 17 those concrete barriers?</p> <p>18 <b>A. Mmm.</b></p> <p>19 Q. In your statement that isn't quite what you say. What 20 you say is that the fencing could do with some traffic, 21 road traffic concrete posts of the sort you might see on 22 a motorway?</p> <p>23 <b>A. The things I'm referring to are the ones that you can 24 see in the photograph here.</b></p> <p>25 Q. Just so we understand and make sure we have understood</p> <p style="text-align: center;">Page 170</p>	<p>1 Q. You also say in your statement that you raised the issue 2 with the security guys?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. Just because maybe we need to put this to somebody if 5 they come along to give evidence so we can see what they 6 say, do you know who it was you spoke to, which security 7 guys?</p> <p>8 <b>A. It was the -- where are we talking about? In 9 Hassi Messaoud or in In Amenas?</b></p> <p>10 Q. I think you must have been referring to In Amenas 11 because you referred to a discussion during a team talk 12 where you raised this point about having concrete 13 barriers as posts for the fence. If that's not right, 14 if it's somebody you spoke to at Hassi or somewhere 15 else --</p> <p>16 <b>A. No, the people I spoke to about the security were 17 Mr Griesdieck, as you have pointed out there.</b></p> <p>18 Q. I am just trying to be more particular about this, 19 Mr Battram.</p> <p>20 <b>A. I am trying to understand your question.</b></p> <p>21 Q. Let me try and help you. You have mentioned in your 22 statement, you have talked about it here, that you 23 raised with Mr Griesdieck an issue about the perimeter 24 fencing?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 172</p>

<p>1 Q. You see in your statement, if you have page 3?</p> <p>2 THE CORONER: Just take him to the particular bit.</p> <p>3 MR POPAT: Of course. Page 3, the bottom paragraph, do you</p> <p>4 see it begins:</p> <p>5 "At a discussion one Sunday during a 'matters</p> <p>6 arising' team talk."</p> <p>7 And then that's where you say he talked about what</p> <p>8 we had achieved and:</p> <p>9 "I suggested the perimeter fence could be made a bit</p> <p>10 more secure if we used those centre of the road traffic</p> <p>11 concrete posts like you see down the middle of</p> <p>12 motorways"?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. You talk about the fencing being four metres tall,</p> <p>15 leaning out to stop people climbing over, with barbed</p> <p>16 wire on top and bottom although this was not</p> <p>17 consistently done. You said:</p> <p>18 "It was dismissed by Mr Griesdieck who told me we</p> <p>19 don't spend money on that sort of stuff."</p> <p>20 There you have identified somebody so if need be and</p> <p>21 if possible we can ask him. You go on to say you</p> <p>22 thought the entrance to the camp was very weakly</p> <p>23 protected:</p> <p>24 "Basically an S-shaped crocodile designed so you</p> <p>25 could drive a 60 seat bus through it. When I raised</p> <p style="text-align: center;">Page 173</p>	<p>1 Q. Thank you. I am being asked to see if you might be able</p> <p>2 to recognise who you think you spoke to if you saw them.</p> <p>3 <b>A. If you have some photographs.</b></p> <p>4 Q. That was why I was hesitant to ask the question because</p> <p>5 I am not sure I'll be able to show you a photograph but</p> <p>6 it may be if we need to we will be able to identify that</p> <p>7 with you.</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. It is the same point really that I wanted to discuss</p> <p>10 about the other matter you have raised which you said</p> <p>11 you spoke to somebody about and that relates to the</p> <p>12 emails?</p> <p>13 <b>A. Yes, that was -- I'll make it clear on this. I was</b></p> <p>14 <b>re-routed to Hassi Messaoud and we were having a daily</b></p> <p>15 <b>update on the drivers strike and we had a video</b></p> <p>16 <b>conference every day and either Tore Bech or George or</b></p> <p>17 <b>whoever was -- who was still in In Amenas would come on</b></p> <p>18 <b>and tell us what the state of play of that was and it</b></p> <p>19 <b>was during those conversations when we were breaking for</b></p> <p>20 <b>coffee or tea that that sort of conversation arose, and</b></p> <p>21 <b>the security people were the people that were in charge</b></p> <p>22 <b>of the security at Hassi Messaoud. I don't know their</b></p> <p>23 <b>names.</b></p> <p>24 Q. I am going to try and help you again with your statement</p> <p>25 because you explain this in a little detail in your</p> <p style="text-align: center;">Page 175</p>
<p>1 this issue with the security guys they basically said</p> <p>2 'that is what we have got'."</p> <p>3 <b>A. The security guys I'm talking about there are the chaps</b></p> <p>4 <b>that were the security liaison officers, one of whom is</b></p> <p>5 <b>dead, so you won't be able to ask him and he was</b></p> <p>6 <b>a friend of mine.</b></p> <p>7 Q. We are well aware of that, Mr Battram.</p> <p>8 <b>A. And the other guys I don't know.</b></p> <p>9 Q. Do you know who you are referring to there?</p> <p>10 <b>A. The people --</b></p> <p>11 Q. By description it is the liaison team security people?</p> <p>12 <b>A. Yes, liaison team security guys.</b></p> <p>13 Q. Was it Mr Morgan or was it somebody else or was it</p> <p>14 a combination of people?</p> <p>15 <b>A. It would be a combination of people because they were on</b></p> <p>16 <b>shifts at different times. You can get the names from</b></p> <p>17 <b>the shift patterns of those rotations.</b></p> <p>18 Q. Yes. I think we can work out who the people were who</p> <p>19 occupied those positions. What we don't know is who you</p> <p>20 think you spoke to.</p> <p>21 <b>A. There was one chap that lived in France so that is</b></p> <p>22 <b>a good start for you, former British military, and I'm</b></p> <p>23 <b>trying to think of who the other guys were. I met three</b></p> <p>24 <b>different people out of the four. There was one that</b></p> <p>25 <b>I didn't meet.</b></p> <p style="text-align: center;">Page 174</p>	<p>1 statement. It is page 6. And in this statement back</p> <p>2 in October, second paragraph down, you say:</p> <p>3 "During my time in Algeria I was informed that the</p> <p>4 IT guys at In Amenas had been reading every single email</p> <p>5 in and out of the base camp."</p> <p>6 Do you see that?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. Ms Dolan asked you to try and help identify who the</p> <p>9 person was or people were who informed you and you said</p> <p>10 you couldn't remember who they were?</p> <p>11 <b>A. That's right.</b></p> <p>12 Q. But at one stage you did say when asked: did you raise</p> <p>13 that with anyone? You said "no, because I left the very</p> <p>14 next day"?</p> <p>15 <b>A. I was told that the -- I'll put it in chronological</b></p> <p>16 <b>order for you so that you've got it clear. We were</b></p> <p>17 <b>sending emails all the time I was in Algeria. We had --</b></p> <p>18 <b>my last rotation I was in Hassi Messaoud and the day</b></p> <p>19 <b>before I left we were in one of these strike meetings</b></p> <p>20 <b>and after the meeting we were standing round having some</b></p> <p>21 <b>coffee and we were talking about the world and the deep</b></p> <p>22 <b>blue sea and one of the chaps, one of the chaps who was</b></p> <p>23 <b>the security guy there said to me, "be careful what you</b></p> <p>24 <b>write in your emails because all the emails are being</b></p> <p>25 <b>monitored." So I said to him "how long has this being</b></p> <p style="text-align: center;">Page 176</p>

<p>1 going on?" And he said, "well in truth we don't know 2 but we can only assume for a long time." And we talked 3 about that being a moral breach and a sackable offence 4 and all the other things that you do.</p> <p>5 Q. I am just trying to get as much detail as we can about 6 the source of this information because you are 7 clearly -- you were clearly able to recall when it took 8 place, this discussion?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. Because you said it was the day before you left and you 11 are now able to recall the sort of environment you were 12 in, you say it was during a coffee break and you had 13 this chat?</p> <p>14 <b>A. I can tell you which office it was in as well.</b></p> <p>15 Q. Let me just ask the question: you were taking part in 16 this sort of video conference that you mentioned. When 17 presumably there were people there who you could speak 18 to about this information you have just received?</p> <p>19 <b>A. Well the video conference had happened in the afternoon. 20 The discussion was after the video conference and I left 21 at 7 o'clock the following morning.</b></p> <p>22 Q. So you can recall now, can you, that it was post the 23 video conference and just before you finished?</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. And before you left the next morning?</p> <p style="text-align: center;">Page 177</p>	<p>1 are. Bearing in mind that we have Scandinavians, 2 Americans, Brits, French, Italians, Dutch, whatever. 3 I think he was a British guy and I think he was the HSE 4 officer for Hassi Messaoud.</p> <p>5 Q. And I take it from that you had a discussion in English?</p> <p>6 <b>A. Yes.</b></p> <p>7 MS GERRY: Thank you. 8 Thank you, sir.</p> <p>9 THE CORONER: Thank you very much indeed.</p> <p>10 <b>A. You're very welcome.</b> 11 <b>(The witness withdrew)</b></p> <p>12 THE CORONER: I think, as everybody knows we can't sit on 13 Monday and Tuesday of next week so we will resume again 14 on Wednesday 24th at 9.30, please. I am just going to 15 ask, please, if as well just to help us with timetabling 16 if the advocates for the interested persons wouldn't 17 mind remaining a little bit behind once I have departed 18 just to help with one or two timetabling issues and 19 estimates for next week.</p> <p>20 And I am asked to tell everybody that if they can 21 hear me in court 66 this applies to you there. We won't 22 be retaining that after today. So don't go to court 66 23 on Wednesday because it won't be reserved for us. But 24 there has been plenty of space in this courtroom I think 25 apart from the first day. All right.</p> <p style="text-align: center;">Page 179</p>
<p>1 <b>A. Yes.</b></p> <p>2 Q. And do you, in those circumstances, being able to recall 3 all of that, are you able to recall a little more 4 precisely who the person was you spoke to who gave you 5 this information?</p> <p>6 <b>A. No, I can't. I have just told you, all I know is that 7 the chap was a security officer or he worked on HSE at 8 Hassi Messaoud. I wasn't resident at Hassi Messaoud and 9 in my time at Hassi Messaoud I was working remotely from 10 my laptop in my room, so I didn't get to know lots of 11 the people there.</b></p> <p>12 MR POPAT: Thank you, Mr Battram.</p> <p>13 MS GERRY: Sir, can I just ask one question?</p> <p>14 THE CORONER: Yes, if anybody has any questions they want to 15 ask then now is the time.</p> <p>16 MS GERRY: Mr Battram, just picking up on you being asked 17 who it was who you spoke to. Can I ask you this: what 18 nationality were they?</p> <p>19 <b>A. I am not trying to protect anybody. I'm trying to 20 remember.</b></p> <p>21 Q. I am trying to help you recall. I am not suggesting 22 that there is anything other than lack of recollection 23 on your part.</p> <p>24 <b>A. To be honest, when you work in a mixed nationality 25 environment like that I don't always remember what they</b></p> <p style="text-align: center;">Page 178</p>	<p>1 MS GOLLOP: Sir, before you rise may I mention two things. 2 One very briefly. I hope I wasn't making an unhelpful 3 and distasteful situation about Mr Battram recognising 4 anybody's face. It simply occurred to me that we are 5 going to have some liaison witnesses and he might have 6 visually recognised one of those or else some 7 photographs of those obviously might have been put in 8 front of him. I was merely trying to be helpful.</p> <p>9 Secondly, I have a request, which I appreciate comes 10 late in the day and really arises out of part of 11 Mr Cobb's evidence and part of Mr Battram's evidence and 12 I will ask what it is and if necessary then explain why 13 I am making it.</p> <p>14 In the Statoil report it says that the investigation 15 team conducted 136 interviews and then the summaries 16 were reviewed and approved by interviewees. My request 17 is whether my learned friend for Statoil would be 18 prepared to provide copies of those witness summaries? 19 If he would and it doesn't cause a difficulty I won't 20 elaborate further.</p> <p>21 THE CORONER: No, it may be that Mr Laidlaw won't know at 22 the moment because I don't know whether you have given 23 him notice or not?</p> <p>24 MS GOLLOP: No, he won't. It was simply something that 25 arose as we were hearing evidence.</p> <p style="text-align: center;">Page 180</p>

1 THE CORONER: Are you able to answer that now, Mr Laidlaw,  
 2 or does it need some thought?  
 3 MR LAIDLAW: Not now, sir, and it will need some thought and  
 4 there are some obvious difficulties but if I could have  
 5 the time then we will respond formally to you and  
 6 obviously copy the response and report to you, sir.  
 7 THE CORONER: Thank you very much.  
 8 MS GOLLOP: One thing that might also assist is perhaps just  
 9 a list of those who are interviewed. It is going to  
 10 save me bobbing up and asking absolutely every single  
 11 witness whether they were interviewed for the purposes  
 12 of the Statoil report is partly what it is.  
 13 THE CORONER: Mr Laidlaw has heard that too.  
 14 MR LAIDLAW: That is an easier request to comply with.  
 15 THE CORONER: Yes, all right.  
 16 MR OWEN-THOMAS: Sir, just one matter from me that I raised  
 17 with Ms Dolan earlier and that I know she was going to  
 18 try speak to you in the luncheon adjournment, which is  
 19 something which didn't happen. Maybe I may raise it  
 20 now. Following the evidence of Mr Collins I have been  
 21 instructed to make an application that Mr Shaw is  
 22 ordered to attend these proceedings to give evidence as  
 23 to the evidence he can give in respect of the security  
 24 assessment.  
 25 THE CORONER: It is on my list -- actually no one has spoken

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1 to me about it but it is on my list of things for me to  
 2 think about. Will you just leave that with me?  
 3 MR OWEN-THOMAS: I will. Thank you very much.  
 4 THE CORONER: My map, you are going to tell me about my map?  
 5 MR POPAT: I am going to tell you, sir, that your map, I am  
 6 very hopeful, is very far underway.  
 7 THE CORONER: Is it? All right.  
 8 MR POPAT: Although it may end up being three maps. I am  
 9 afraid, in order to break up the BdV, the CPF and the  
 10 other location. I was simply going to mention that  
 11 pursuant to your instruction earlier in the week we have  
 12 circulated submissions in relation to the  
 13 introduction/admissibility of the Libyan evidence.  
 14 THE CORONER: Of course, the 2011 Libyan --  
 15 MR POPAT: But also included in those submissions is  
 16 a submission in relation to the material relating to  
 17 Mr Christie which is the contractual material.  
 18 THE CORONER: Yes.  
 19 MR POPAT: In relation to which, sir, you indicated  
 20 a provisional view that you were proposing to call  
 21 Mr Christie and as you will see from the submissions and  
 22 as everyone else will, we are not formally resisting  
 23 that course but we do suggest that it will not actually  
 24 help matters that you have to consider and the issues  
 25 that you have to determine and more particularly, that

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1 it shouldn't in any way lead to you being invited to  
 2 make a determination on the employment status of any  
 3 individual who may be relevant to these proceedings.  
 4 THE CORONER: No, all right. I will certainly look at that  
 5 and I think from recollection I think I said to  
 6 Mr Garnham when I indicated that my provisional view was  
 7 that we would hear from him I think I may have said then  
 8 that some issues may loom greater or smaller by the end  
 9 of the matter. And I had that well in mind.  
 10 Thank you all very much indeed. So Wednesday, 9.30.  
 11 (2.35 pm)  
 12 (The inquest adjourned until Wednesday, 24 September at  
 13 9.30 am)

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