

<p>1 Wednesday, 24 September 2014</p> <p>2 (9.30 am)</p> <p>3 (Proceedings delayed)</p> <p>4 (9.50 am)</p> <p>5 THE CORONER: Thank you very much for those. In fact in</p> <p>6 particular what I am picking up is the third one, which</p> <p>7 has most things on one page. That is going to be very</p> <p>8 helpful. So I am grateful to those who have done that.</p> <p>9 Just two other things perhaps just to say before we</p> <p>10 start. I have well in mind the points that have been</p> <p>11 made about Mr Christie and the employment issue and</p> <p>12 don't want to spend ages on it now because time is</p> <p>13 short, but certainly when I said that my provisional</p> <p>14 view was that we would hear it, it was on the question</p> <p>15 that, as it were, you had extracted from Mr Garnham's</p> <p>16 document as to whether there was a difference in</p> <p>17 treatment and I appreciate your point that in fact</p> <p>18 Mr Christie may not be really the best person who is</p> <p>19 able to deal with that.</p> <p>20 So long as it is taken shortly and let's just see</p> <p>21 where we are at the end of that. That was that.</p> <p>22 So far as timetable is concerned, I am very grateful</p> <p>23 to everybody for the cooperation there has been about</p> <p>24 that and I am very anxious to ensure that everybody has</p> <p>25 the time they need to ask questions. That said, we have</p> <p style="text-align: center;">Page 1</p>	<p>1 MR DARREN MATTHEWS (sworn)</p> <p>2 Questions from MS DOLAN</p> <p>3 MS DOLAN: Good morning, Mr Matthews.</p> <p>4 A. Good morning.</p> <p>5 Q. My name is Bridget Dolan. I am asking questions on</p> <p>6 behalf of the coroner. Could you give us your full name</p> <p>7 please?</p> <p>8 A. It is Darren Matthews.</p> <p>9 Q. I think back in January 2013 you were working at</p> <p>10 In Amenas plant?</p> <p>11 A. I was, yes.</p> <p>12 Q. What was your job?</p> <p>13 A. I was the lead E and I Atex engineer.</p> <p>14 Q. And what does that mean in practice?</p> <p>15 A. I was looking after the electrical and instrumentation</p> <p>16 equipment on site that was in a hazardous area to make</p> <p>17 sure that it adhered to all the specifications.</p> <p>18 Q. Who employed you?</p> <p>19 A. I was employed by ABB SARPI which was a subcontractor of</p> <p>20 the JV.</p> <p>21 Q. How long had you been on the site when January 2013 came</p> <p>22 around?</p> <p>23 A. Just short of two years.</p> <p>24 Q. What kind of work rota did you work?</p> <p>25 A. I either did a 4 and 4 or a 3 and 3 rotation.</p> <p style="text-align: center;">Page 3</p>
<p>1 the timetable to stick to. We'll check perhaps</p> <p>2 at 1 o'clock but if it is convenient there is the chance</p> <p>3 of losing 15 minutes or so at lunchtime if everybody</p> <p>4 thinks less than an hour would suffice and we can go on</p> <p>5 until 5.30 or so. I am not trying to make everybody do</p> <p>6 long days, but I do want everybody to have the</p> <p>7 opportunity they need.</p> <p>8 But that just does mean I obviously don't know as</p> <p>9 much about all of this as everybody else but I think</p> <p>10 I probably have most of the big points and it will</p> <p>11 require, I think, a measure of discipline and probably</p> <p>12 not a run up to questions and we'll need to get straight</p> <p>13 to the point if we are to use the time to the best</p> <p>14 effect.</p> <p>15 All right. But thank you all very much indeed.</p> <p>16 MR POPAT: Sir, so far as the plans are concerned, may</p> <p>17 I just apologise that they are obviously not in as</p> <p>18 swishy a format as one might have hoped.</p> <p>19 THE CORONER: No.</p> <p>20 MR POPAT: But with the time limitations and technical</p> <p>21 difficulties that is, I am afraid, what we can manage.</p> <p>22 THE CORONER: They are swishy enough for me. They're very</p> <p>23 good, thank you very much.</p> <p>24 MS DOLAN: Sir, the first witness today is Mr Darren</p> <p>25 Matthews.</p> <p style="text-align: center;">Page 2</p>	<p>1 Q. Could you help us by showing us where about on the site</p> <p>2 it was that you were based. First your living</p> <p>3 accommodation. If I could bring up the picture IA026,</p> <p>4 please, and you should also -- it will be on the screen,</p> <p>5 Mr Matthews, but I can get you a hard copy because it is</p> <p>6 sometimes easier to look on a hard copy.</p> <p>7 A. Yes.</p> <p>8 Q. We have already heard in the inquest about the BdV area</p> <p>9 and the CPF and where they are located on the road. Do</p> <p>10 you recognise the picture you are looking at there?</p> <p>11 A. I do, yes. It has been a long time since I've seen this</p> <p>12 picture, but, yes.</p> <p>13 Q. Can you describe what --</p> <p>14 MS GERRY: Sorry to interrupt you, we are having trouble</p> <p>15 hearing you over here.</p> <p>16 THE CORONER: One of those is I think recording, is it, and</p> <p>17 one is amplifying.</p> <p>18 MS DOLAN: So what are we looking at there in that picture?</p> <p>19 A. This is the, if -- this is the BdV on the right-hand</p> <p>20 side and the companies camp is on the left-hand side.</p> <p>21 Q. Where did you live?</p> <p>22 A. I lived in the companies camp.</p> <p>23 Q. Are you able to locate it on that picture by describing</p> <p>24 whereabouts?</p> <p>25 A. Yes, if you come down the companies camp is on the</p> <p style="text-align: center;">Page 4</p>

<p>1 left-hand side.</p> <p>2 THE CORONER: You might have, do we have any spares of this?</p> <p>3 MS DOLAN: He has one.</p> <p>4 THE CORONER: No, but of the marked one?</p> <p>5 MR POPAT: If I hand up this one.</p> <p>6 THE CORONER: It is just ...</p> <p>7 A. Do you want me to draw on that one? Do you want me to</p> <p>8 hold it up so people can see and mark or?</p> <p>9 THE CORONER: Most of us have it but let us just see, at the</p> <p>10 end you can probably hold it up but tell us first of</p> <p>11 all.</p> <p>12 A. Just roughly in the middle of the companies camp in row</p> <p>13 M. M8 was my cabin which is --</p> <p>14 MS DOLAN: We can see lots of little boxes, they are cabins</p> <p>15 are they?</p> <p>16 A. Yes, they're all cabins and there is the extension which</p> <p>17 is where it narrows down, that is the extension to the</p> <p>18 companies camp, the original companies camp. I was</p> <p>19 in --</p> <p>20 Q. Just to be clear, if we look at the part that is the</p> <p>21 companies camp on the left, if it was a domino you are</p> <p>22 in the top half of the domino?</p> <p>23 A. The middle, the middle, yes.</p> <p>24 Q. Where that road goes between --</p> <p>25 A. Yes, if you can see there is a little bit missing on the</p> <p style="text-align: center;">Page 5</p>	<p>1 first fence the ball used to, because we weren't</p> <p>2 particularly great at football, used to go over the</p> <p>3 fence quite a lot and the ball could be retrieved by</p> <p>4 going under that fence.</p> <p>5 Q. You say that is the first fence?</p> <p>6 A. That's the first fence between us and then there was</p> <p>7 a second fence.</p> <p>8 Q. And what was on the tops of those fences?</p> <p>9 A. I can't recall anything off the top of my head.</p> <p>10 Q. And to get into the companies camp how did you get</p> <p>11 there?</p> <p>12 A. You came through the same gate that you came through for</p> <p>13 the BdV and then walked along the car park, side of the</p> <p>14 car park.</p> <p>15 Q. So starting with the gate you come to, again if you look</p> <p>16 at the --</p> <p>17 A. The outer gate.</p> <p>18 Q. The map that has the labels on it has an outer gate and</p> <p>19 inner gate marked?</p> <p>20 A. Yes, you go through the outer gate and walk through to</p> <p>21 the inner gate and then you would take a right and walk</p> <p>22 down to where the road is where you could see the</p> <p>23 blacktop and then just carry that road through and then</p> <p>24 that will be your access to the companies camp.</p> <p>25 Q. Were there ever any other entries into the fencing that</p> <p style="text-align: center;">Page 7</p>
<p>1 top left, if you come back maybe one to the right and</p> <p>2 then halfway down the second section. So roughly about</p> <p>3 (indicated).</p> <p>4 THE CORONER: Just hold it up and point.</p> <p>5 A. Roughly about there. (indicated).</p> <p>6 THE CORONER: Right.</p> <p>7 A. Is my location. One of these two.</p> <p>8 THE CORONER: Okay. Thank you.</p> <p>9 MS DOLAN: So in that block of all the oblongs we see</p> <p>10 there's probably two missing that make a little gap and</p> <p>11 then it's to the right of there.</p> <p>12 A. Yes.</p> <p>13 Q. At the companies camp what was the outer perimeter of</p> <p>14 the companies camp like?</p> <p>15 A. It was fenced, it's just one of them things that you see</p> <p>16 but you don't really pay much attention to really</p> <p>17 because it's just one of those things that you're --</p> <p>18 don't really take in.</p> <p>19 Q. What was the fencing like?</p> <p>20 A. It was okay. It wasn't in the best of nick, as I would</p> <p>21 call it. We used to play football, as -- if you can see</p> <p>22 the football pitch in the BdV side.</p> <p>23 Q. Is that the football pitch to the right of the big white</p> <p>24 oblong in the BdV, that gap there?</p> <p>25 A. Yes, just to give you how easy it was to get through the</p> <p style="text-align: center;">Page 6</p>	<p>1 were used?</p> <p>2 A. Not that we used. There was another entrance which is</p> <p>3 marked as gate 2 but that was very seldom open.</p> <p>4 Q. And that's in the bottom left-hand corner where in this</p> <p>5 map it says "locked gates 2", is it?</p> <p>6 A. At the top where it says "original entryway".</p> <p>7 THE CORONER: So top middle.</p> <p>8 MS DOLAN: There is another gate 2 marked. So that was an</p> <p>9 entry but you said, sorry?</p> <p>10 A. That was usually locked unless they were doing something</p> <p>11 with this outer gate when -- if there was a repair or</p> <p>12 something was happening with the main gate where we came</p> <p>13 in then that would be our other form of access and that</p> <p>14 then -- that's when the T card system would get moved</p> <p>15 from the original gate to gate 2 at the top, and then</p> <p>16 that would be used as our access.</p> <p>17 Q. If you can see on this map on the bottom left-hand</p> <p>18 corner there is a marking that says "locked gates"?</p> <p>19 A. Yes.</p> <p>20 Q. It then has a 2 on it. Again, first of all, is that</p> <p>21 a correct label, was that a locked gate?</p> <p>22 A. I don't know because I never went over there so I can't</p> <p>23 really pass comment.</p> <p>24 Q. The original entry gate, the old one that you say wasn't</p> <p>25 used so much, when you say it was locked, what secured</p> <p style="text-align: center;">Page 8</p>

1 it, what type of gate was it and what secured it?
 2 **A. Again, I don't know. I just know that they used to use**
 3 **that gate when the other gate was closed. When that**
 4 **wasn't being used, then that gate would get used as the**
 5 **main access to the camp.**
 6 Q. We dealt with where you lived. Where did you work when
 7 you were on the site?
 8 **A. I worked in the offices at the CPF and also**
 9 **predominantly on site at the CPF.**
 10 Q. When you first came to work at In Amenas what kind of
 11 induction did you get in respect of health and safety?
 12 I am not so interested in your actual specific job but
 13 the general health and safety induction?
 14 **A. Not a great one. Very brief. Just the usual touching**
 15 **on points that you would need normal health and safety.**
 16 **Nothing in particular of the region you were in, nothing**
 17 **to do with obviously terrorism, what to do in**
 18 **a terrorism attack. Nothing along those lines.**
 19 Q. We have heard that there was an induction which did
 20 include a small part about what to do if there was an
 21 alert because of terrorism. Do you recall that?
 22 **A. I don't recall that, no.**
 23 Q. Were you given any information about what to do if there
 24 was a security alert?
 25 **A. Not for a terrorism. Usually it was like for a muster.**

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1 **We would go and go to the muster point which was just**
 2 **beside the -- on the inner gate where the muster point**
 3 **was.**
 4 Q. The muster point was by the entry?
 5 **A. Yes. And the muster alarm, but that's the only thing**
 6 **that I can recall. I can't recall anything to do with**
 7 **what to do in the event of being attacked by terrorists.**
 8 Q. Do you recall any notices on your door in your
 9 accommodation?
 10 **A. I do. But I only recall that because I read it whilst**
 11 **I was in my room with Ian during the terrorism attack**
 12 **because how long can you sit in your room and then we**
 13 **obviously noticed the sign on the door.**
 14 Q. And what did that sign say?
 15 **A. "Lay down on the floor".**
 16 Q. So --
 17 **A. Just in case people start shooting obviously you're at**
 18 **the lowest point.**
 19 Q. Do you recall when you gave a witness statement to the
 20 police and it was some time ago back in January 2013,
 21 very shortly after events?
 22 **A. Yes.**
 23 Q. That what you said at the time then was there was
 24 a notice found on the back of your door. That you had
 25 never taken any notice of before but it said what to do

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1 in a terrorist situation. You said:
 2 "I saw it after the events and it said this is what
 3 you, this is the procedure and it is a different alarm."
 4 Do you recall that now?
 5 **A. I do, yes, but like I say at the time that was me in the**
 6 **situation not being told anything previous to that.**
 7 Q. Were there any alarm practices or drills held while you
 8 were there?
 9 **A. There was muster alarm drills, yes.**
 10 Q. And what did that involve?
 11 **A. That involved the muster alarm going off and you leaving**
 12 **the camp and going to the muster station and then**
 13 **everyone used to congregate in whatever rows you were**
 14 **living in and then there was no head count as such. It**
 15 **just went off for a period of time. You did like a T**
 16 **card system and then after a certain amount of time once**
 17 **the security or whoever was taking the T card or**
 18 **whoever's taking the muster or in charge of the muster**
 19 **system was happy that everyone was accounted for then**
 20 **the alarm stopped and you went back to your normal**
 21 **activities.**
 22 Q. How often did those drills take place?
 23 **A. Well I was there usually either three weeks or four**
 24 **weeks, you usually got at least one.**
 25 Q. And were those drills just while you were in your

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1 accommodation at the BdV?
 2 **A. No, that was also at the CPF as well.**
 3 Q. Before these events happened what, if anything, did you
 4 know about different alarm sounds?
 5 **A. I didn't. I noticed, not initially noticed a difference**
 6 **in alarms but when it had been going for a period of**
 7 **time obviously I realised that it was a different alarm**
 8 **because my initial reaction was to go and muster until**
 9 **obviously I heard the bullets and things like that**
 10 **and ...**
 11 Q. I will come back to the actual events that happened, but
 12 can I just ask you a little bit about the gate into the
 13 living areas?
 14 **A. Yes.**
 15 Q. First of all, we understand there are two gates as one
 16 approaches in a car to the living areas, to the
 17 integrated camp. Is that your recollection?
 18 **A. Two gates as in?**
 19 Q. One to approach the before one enters the car park and
 20 then one after the car park?
 21 **A. Yes.**
 22 Q. Can I just ask you about the gate which I think some
 23 people call the outer gate or it has different
 24 terminology?
 25 **A. Yes.**

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<p>1 Q. The gate before one enters in the car park area, so you 2 know the one I'm talking about?</p> <p>3 A. Yes.</p> <p>4 Q. How often would you approach that gate in a week, in 5 a working week?</p> <p>6 A. In a working week every day. Obviously in a vehicle. 7 It would be on a morning, on a dinner time, there and 8 back and on an evening.</p> <p>9 Q. How was the gate when you approached it generally at 10 those times?</p> <p>11 A. There would be a security guy in his hut but this guy 12 wouldn't be -- he would be just lifting a barrier up and 13 putting a barrier down. There would be like a chicane 14 sort of access with bollards so you would have to weave 15 in to the access to the camp.</p> <p>16 Q. And you are describing just a barrier. Was there a gate 17 there at all which was closed or closeable?</p> <p>18 A. There was a gate there but it was never closed. It was 19 just always a barrier was done and obviously the 20 bollards are always there.</p> <p>21 Q. Then after the car park first of all, when you came in 22 vehicles were you someone who tended to leave your 23 vehicle in the car park or did your vehicle go on into 24 the living area?</p> <p>25 A. No, I wasn't lucky enough to have a vehicle. I was</p> <p style="text-align: center;">Page 13</p>	<p>1 the gate was the T card system where everyone's T card 2 would go in whether or not you were in the companies 3 camp and if your card wasn't there then you would be at 4 the site.</p> <p>5 Q. You said about going out in the morning, evening and 6 lunchtime. Was it that you were only approaching at 7 busy times and the gate was open then? Did you ever 8 approach it outside what I call the rush hour?</p> <p>9 A. Yes.</p> <p>10 Q. Was it open or closed then?</p> <p>11 A. Open.</p> <p>12 Q. Were there any personnel at this gate?</p> <p>13 A. Yes, you had the, well, security hut as such where all 14 the T cards were in keys and where they did like the 15 baggage checks for newcomers coming in. That was like 16 a little hut just in front of that and then next to the 17 gate, what you have described as the outer gate, there 18 was a little hut there.</p> <p>19 Q. When you approached the gate on foot what would the 20 security person be doing? Would they be in the hut 21 or standing somewhere else?</p> <p>22 A. You would very seldom see anyone next to the pedestrian 23 hut -- well, gate.</p> <p>24 Q. So as an employee you were left to put your own T card 25 in?</p> <p style="text-align: center;">Page 15</p>
<p>1 a person who got a lift.</p> <p>2 Q. So the vehicle you are approaching in would be one that 3 was left in the car park?</p> <p>4 A. Yes, or a bus. I would either travel on a bus or get 5 a lift.</p> <p>6 Q. And the inner gate, what did you usually find as you 7 approached that inner gate?</p> <p>8 A. The inner gate you had the T card system which is where 9 you would put your T card so that --</p> <p>10 Q. First of all, the gate, would this be a closed or an 11 open gate?</p> <p>12 A. The gate would always be open.</p> <p>13 Q. And are we talking about a pedestrian gate or a vehicle 14 gate here?</p> <p>15 A. A pedestrian gate.</p> <p>16 Q. So the pedestrian gate, if you can just describe it?</p> <p>17 A. Yes, it's just -- there was just the metal, a metal 18 gate, like with not so much chicken wire but, you know, 19 like the wire that goes across that you would have for 20 a fence. Just that all the way through.</p> <p>21 Q. And you say it would usually be open?</p> <p>22 A. Open, yes.</p> <p>23 Q. Was it always open or --</p> <p>24 A. From what I can remember the gate was always open, yes, 25 the pedestrian gate was always open and on the side of</p> <p style="text-align: center;">Page 14</p>	<p>1 A. Yes, yes.</p> <p>2 Q. Was anybody checking whether you did that properly?</p> <p>3 A. No. No. That was -- well, that was your responsibility 4 to put your T card in the slot.</p> <p>5 Q. We understand there is also a vehicle gate at or near to 6 that pedestrian gate?</p> <p>7 A. Yes.</p> <p>8 Q. Can you assist us with what you recall about whether the 9 vehicle gate, what position that would be in?</p> <p>10 A. Usually a vehicle would sit there and if nobody came 11 out, then the driver would give a beep of his horn and 12 then the guy would come out from the hut and open the 13 gate.</p> <p>14 Q. So from what you are describing it sounds like you are 15 describing a gate that's closed when the vehicle 16 approaches it?</p> <p>17 A. Yes.</p> <p>18 Q. Again, was that always closed, or was it sometimes 19 closed?</p> <p>20 A. The car one was always closed from what I can remember.</p> <p>21 Q. How close was the security person to the gate when the 22 car would approach it and need action?</p> <p>23 A. In the office or -- you could see the, where you've got 24 your baggage search gatehouse, you have got that 25 pointing at the --</p> <p style="text-align: center;">Page 16</p>

<p>1 Q. Again, you have mentioned baggage search gatehouse? 2 A. That is the gatehouse where the guy would be sat and 3 obviously you have your inner gate and so that's how far 4 it would be away. 5 THE CORONER: Just to clarify because it is difficult to 6 follow the line, but the line for baggage search guy, 7 the line, that comes down to that little light green 8 rectangle, does it? 9 A. This one there (indicated). 10 MS DOLAN: On which side of the fence is that? 11 A. That would be on -- in the car park. 12 Q. In the car park? 13 A. Yes. 14 Q. So it is not on the -- 15 A. No. 16 Q. And that is where the security guard -- 17 A. Would be, yes. In there. 18 Q. Were there any security guards on the other side of the 19 gate on the inside of the complex? 20 A. There would be but they would be in this building there 21 (indicated). 22 Q. So you are pointing at that white square which is -- 23 what is that building? 24 A. That's the OLC. 25 Q. So that's the liaison office? <p style="text-align: center;">Page 17</p></p>	<p>1 A. It didn't, no, I was always on the CPF. 2 Q. So your daily travel to work would be down the metal 3 road between the BdV and the CPF? 4 A. Yes. 5 Q. And back again? 6 A. Yes. 7 Q. On that journey between the BdV and the CPF did you see 8 Gendarmes at all? 9 A. No. Obviously it went past the camp but that was about 10 it. 11 Q. Can I then turn to asking you about the events of the 12 16th. Where were you on the morning of the 16th when 13 things started happening? 14 A. I was in my room getting ready to go to work. 15 Q. What was the first thing that alerted you to the fact 16 this wasn't a normal day? 17 A. The first thing, if I'm honest, was Ian usually comes 18 for me every morning. 19 Q. That's Ian Strachan? 20 A. Ian Strachan and obviously I heard the alarm go off but 21 at first, at first thoughts I thought that was a muster 22 so I just thought, oh well, that's it, I'm getting ready 23 to go to work so I'll just continue getting ready to go 24 to work. Then I realised Ian wasn't banging on the door 25 as he normally would bang on the door in the morning as <p style="text-align: center;">Page 19</p></p>
<p>1 A. That is the liaison office, yes. 2 Q. From the liaison office was there a view of the gate? 3 A. I can't remember, no. 4 Q. Don't worry. We can ask somebody else. 5 Can I just ask you a little bit about the Gendarmes 6 at the camp? 7 A. Yes. 8 Q. We have heard about the escorts, so we know how 9 Gendarmes would escort people when they were going to 10 and from In Amenas for leaving and coming to the site. 11 Outside those times when you are being escorted because 12 you are leaving the site somehow how often did you see 13 the Gendarmes during your daily activity? 14 A. Very, very seldom. We used to see them going from the, 15 like the Gendarme camp maybe down to VCP1 but apart from 16 that not very often at all. 17 Q. When you say you used to see them they would be going 18 where? 19 A. Just in the vehicles. 20 Q. Where? On the tarmacked road? 21 A. On the tarmacking. 22 Q. Any other times you saw the Gendarmes around? 23 A. No. 24 Q. Did your role take you out into the field much or were 25 you always -- <p style="text-align: center;">Page 18</p></p>	<p>1 he started swearing through the door, so then obviously 2 I let him in and saw everyone running back to their 3 rooms. 4 Q. If I can just pause there. Can you recall whether Ian 5 was banging on the door before or after the alarm began? 6 A. I can't remember. 7 Q. If it helps, in your witness statement very shortly 8 after the events, what you said was: 9 "Ian knocked on the door and said open the door, 10 open the door and that's when the alarm started going 11 off." 12 A. Right. 13 Q. Does that assist you at all now? 14 A. If that's what I've said, then that's what it will be 15 because ... it was closer to the time. 16 Q. Do you know what time that was? 17 A. That was roughly about 5.45. 18 Q. I interrupted you when you were telling us. What 19 happened next? 20 A. Ian came into the -- well, Ian came into the room. As 21 he came into the room we started hearing the gunfire. 22 Obviously I didn't really obviously hear it on the TV 23 and things like that what gunfire sounds like but you 24 don't really know what a machinegun sounds like until 25 you hear a machinegun going off. <p style="text-align: center;">Page 20</p></p>

5 (Pages 17 to 20)

<p>1 Q. Were you able to have any idea where it was coming from 2 or how far away it was?</p> <p>3 A. You could hear it was -- as my room was there it was 4 coming from my east northeasterly direction. You could 5 kind of tell that that's the direction it was coming 6 from. So to the top right in the corner of your 7 picture.</p> <p>8 Q. So to the top right hand corner of the picture?</p> <p>9 A. Yes, that sort of direction.</p> <p>10 Q. But you couldn't tell anything about the distance?</p> <p>11 A. No, no.</p> <p>12 Q. Is it right that the top right-hand corner of the 13 picture would take one to --</p> <p>14 A. In Amenas.</p> <p>15 Q. -- the road that is the road that goes towards the VCP1?</p> <p>16 A. Yes.</p> <p>17 Q. Sorry, what happened next? You could hear the gunfire?</p> <p>18 A. Yes, came back into the room. Obviously then started to 19 get pretty scared. We went back out of the room to see 20 all the people running -- all the locals, the national 21 guys running back to their rooms because the companies 22 camp was predominantly lived in by locals.</p> <p>23 Q. Why were you there if it was largely the nationals that 24 lived there?</p> <p>25 A. Because we were like the overflow kind of thing. I was</p> <p style="text-align: center;">Page 21</p>	<p>1 kind of artillery?</p> <p>2 A. It could have been but it just lit up the sky so 3 automatically we just thought flares.</p> <p>4 Q. How many of those did you see?</p> <p>5 A. Two or three and then obviously the continuation of the 6 gunfire and then we got -- we went back into the room, 7 locked the door, because at the time my -- when I went 8 back this trip my door, the handle on my door for the 9 room was broken so I had to physically lock my door.</p> <p>10 Q. Just pausing there. How secure are the doors to the 11 rooms usually?</p> <p>12 A. Usually --</p> <p>13 Q. You tell us about yours was broken?</p> <p>14 A. Usually they're pretty good. They open out -- if you're 15 stood outside they open out over rather than in over.</p> <p>16 Q. How substantial are those doors?</p> <p>17 A. It's just like a normal Portakabin that you're living 18 in. Nothing fantastic by any stretch of the imagination 19 but it's your little piece of home, kind of thing.</p> <p>20 Q. So you said your door was broken?</p> <p>21 A. Yes, the handle wouldn't work properly. The latch from 22 the door wouldn't go into its lock position so I had to 23 physically pull the door to and lock it for the door to 24 shut. So that's what I was doing on this trip. I never 25 did that any other trip. And we always used to say to</p> <p style="text-align: center;">Page 23</p>
<p>1 like a subcontractor. So that's where we got put. We 2 never got put in the BdV.</p> <p>3 Q. Sorry, you say you saw?</p> <p>4 A. So me and Ian went outside. We saw the guys running 5 back. The guy who lived next door to me started 6 shouting "fire fire". Obviously couldn't speak a great 7 deal of English so automatically I just thought it's 8 a fire. It's not guns what I'm hearing. It's like 9 a generator or transformer that's blown up and that's 10 why we've lost power and trying everything you can to 11 think it's not what you think it is it's something else 12 and some of the other guys ran past and then they 13 shouted "terrorist, terrorist, terrorist", and that's 14 obviously it hit that that's what it is.</p> <p>15 Q. Isn't it about that time that you saw some flares?</p> <p>16 A. The flares went up in the air. Whether that was from 17 the terrorists or from the Gendarmes, I don't know 18 obviously.</p> <p>19 Q. Where did these flares appear to come from?</p> <p>20 A. I think -- well they came from my right-hand side, so 21 over the top from that way, so from this side, from the 22 right-hand side from the BdV side over the top.</p> <p>23 Q. You say flares?</p> <p>24 A. Well it looked --</p> <p>25 Q. How sure are you that they were flares rather than some</p> <p style="text-align: center;">Page 22</p>	<p>1 each other, whatever you do don't leave your keys in the 2 door because if you're sleeping or anything like that 3 then obviously no one can wake you up or get you out of 4 bed or whatever but this trip because I had to 5 physically lock the door then I was leaving my keys in 6 the lock.</p> <p>7 Q. So you and Ian are now locked in your room?</p> <p>8 A. Yes.</p> <p>9 Q. And what happened next?</p> <p>10 A. Obviously the power's out by that time.</p> <p>11 Q. About what time is that?</p> <p>12 A. About 6.15 I think by this time. Then roughly about 13 6.30 -- obviously we'd have sat there not talking 14 a great deal because you still don't know what's really 15 happening. And then we heard footsteps outside to what 16 I can only presume, he never went to, the guy who was 17 outside never went to any other room. He just -- he 18 made his bee line, you could hear him clear as day walk 19 and walk straight to my room and tried the door, tried 20 to get the door open and try to barge the door open. 21 Obviously couldn't get the door open.</p> <p>22 Q. You said barge the door open?</p> <p>23 A. Yes.</p> <p>24 Q. This is the door that opens outwards?</p> <p>25 A. Yes. Obviously he's not very bright. So he tried to</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

<p>1 obviously kick the door in. Couldn't do it.</p> <p>2 Q. But you are clear somebody was not just trying the lock,</p> <p>3 was actually trying to barge in?</p> <p>4 A. Yes, at that point I was still numb to the fact of what</p> <p>5 was going on.</p> <p>6 Q. Would it be well known to people who were familiar with</p> <p>7 the camp that all these doors outwards or was yours</p> <p>8 unusual?</p> <p>9 A. No, it was the same for all the companies camp. So then</p> <p>10 he went away and I don't know how long he went away for,</p> <p>11 but it only seemed like minutes, then he came back and</p> <p>12 he had a key for the room and he tried, tried the key</p> <p>13 but obviously fortunately my key was in the back of the</p> <p>14 door that day so he never managed to get in.</p> <p>15 Q. What time was that about?</p> <p>16 A. Roughly about 6.30.</p> <p>17 Q. Then I think there came a time when you were getting</p> <p>18 text messages or sending text messages to your</p> <p>19 colleagues?</p> <p>20 A. Yes, I was sending text messages to, I sent one to</p> <p>21 Stevie McFaul, who is sat over there. And also Mark</p> <p>22 Grant and Richard Stephen. Mark Grant was the only one</p> <p>23 that replied. Mark was still in the companies camp. He</p> <p>24 was in the companies camp extension which was further</p> <p>25 south of me which is down in this little, where it</p> <p style="text-align: center;">Page 25</p>	<p>1 A. Not from Richard, not that I can recall. From Mark</p> <p>2 Grant I was texting.</p> <p>3 Q. Sorry, it is my mistake. He had some information from</p> <p>4 Richard?</p> <p>5 A. Yes. Well, for some guys that had been on the bus, just</p> <p>6 that obviously they found that the bus had been attacked</p> <p>7 and that they had obviously taken hostages.</p> <p>8 Q. And then I think you found out some hostages had been</p> <p>9 taken. Were you given some names of people who had been</p> <p>10 taken hostage?</p> <p>11 A. At that point that was the point that we found out that</p> <p>12 Paul was killed.</p> <p>13 Q. Did you get some information later about people who had</p> <p>14 been taken hostage do you recall? Sorry, take a drink.</p> <p>15 (Pause).</p> <p>16 A. From there we found out that Stevie was, Stevie has been</p> <p>17 taken hostage and I can't remember who else now.</p> <p>18 Q. I think in January you could recall Mark Grant telling</p> <p>19 you about Garry Barlow and Gordon Rowan?</p> <p>20 A. Yes, Garry and Gordon, yes.</p> <p>21 Q. Are you now able to recall when you learnt that news?</p> <p>22 A. It was in roughly about the lunchtime that we learnt</p> <p>23 about Garry and Gordon being taken hostage. They had</p> <p>24 been taken hostage down at the CPF.</p> <p>25 Q. Did you get from anybody else any more information about</p> <p style="text-align: center;">Page 27</p>
<p>1 narrows down. He was in JJ07 and we were texting</p> <p>2 between ourselves just basically saying, "have you heard</p> <p>3 anything?" Just trying to keep each other as up-to-date</p> <p>4 with information as we can between ourselves because</p> <p>5 I know he had a couple of the guys' numbers who were</p> <p>6 early risers, as we say, they were down on the CPF. So</p> <p>7 we're keeping in touch, tried to keep in touch with</p> <p>8 everyone.</p> <p>9 Q. Did you have any instructions or knowledge of any</p> <p>10 central point of contact or if an incident arose who,</p> <p>11 how you get information?</p> <p>12 A. No, nothing.</p> <p>13 Q. So you are contacting the people you know and numbers</p> <p>14 you have already?</p> <p>15 A. Yes, just your work colleagues, yes.</p> <p>16 Q. I think there came a time when the alarm went off. Can</p> <p>17 you recall when that was?</p> <p>18 A. Off the top of my head I can't, no, but it did</p> <p>19 eventually go off, yes.</p> <p>20 Q. You thought back in January it was about 7.20 in the</p> <p>21 morning. Does that sound about right?</p> <p>22 A. Yes, if that's what I've said that will be right from</p> <p>23 what I can recall.</p> <p>24 Q. And I think you made some contact with Richard Stevens,</p> <p>25 do you recall what you learnt from him?</p> <p style="text-align: center;">Page 26</p>	<p>1 how that happened?</p> <p>2 A. No, like I said the only person was Mark. He got the</p> <p>3 information from whoever he was texting. I think it was</p> <p>4 Kev Graham and Mark was giving me the information.</p> <p>5 I was basically receiving information from Mark.</p> <p>6 I was -- the only information I could give Mark was that</p> <p>7 I was in my room with Ian and we were both still okay.</p> <p>8 Q. I think there came a time when you saw some of the</p> <p>9 locals moving around and opened your room door?</p> <p>10 A. Yes.</p> <p>11 Q. Can you tell us about that?</p> <p>12 A. Yes, that was in the morning. The guy that lived more</p> <p>13 or less opposite me was kind of in charge of the</p> <p>14 companies camp.</p> <p>15 Q. He was a national, was he?</p> <p>16 A. He was a national, yes. He took it upon himself with</p> <p>17 another couple, I don't know if it was his deputy or</p> <p>18 whoever it was or another couple of his friends, they</p> <p>19 decided to help us out, that they would move into the</p> <p>20 cabin next door to me and Ian. Totally off their own</p> <p>21 back, to try to help us get out or give us as much</p> <p>22 information as they could. So they moved in next door</p> <p>23 to us to give us as much information as they could but</p> <p>24 they just had their radios and obviously as soon as the</p> <p>25 radios went dead the power was cut so they soon lost</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

1 power to their radios and that was all forms of contact
 2 gone. Halfway through the morning we heard a lot of
 3 commotion outside and there was a lot more locals
 4 gathering outside.
 5 Again, opened the door, we were told to go back
 6 inside. But they just found it very -- we were hiding
 7 but they were just classing it as like -- they were just
 8 like a normal, a normal day for them. Not a normal day
 9 but they were just going about everyday business. They
 10 were just walking about and then at that time previous
 11 my window was covered with newspaper because previous to
 12 that I was on a shut down and I was on night shift so
 13 I covered the window. So I just tore a corner out so
 14 I could see what was going on outside and you could hear
 15 like it was either rocket or some gunfire went off and
 16 it came -- you could hear it come over the top of the
 17 cabin and they all just hit the deck and then they just
 18 all scarpered and then roughly about 20 minutes, half an
 19 hour the 10 and 15 people that were there then turned
 20 into 70 people and they all had their bags packed and
 21 they were all passing by our room. So we opened the
 22 door again because we saw some guys who we used to play
 23 football with. We said, basically, what's happening.
 24 They said obviously the terrorists don't want us.
 25 They're only interested in expats. Get back in your
 Page 29

1 room. Put your fridge in front of your door. Anything,
 2 just hide, just stay out of the way. Keep undetected.
 3 So we went back in the room again. Saw all these
 4 guys obviously just walking off the site or walking off
 5 camp and we just sat tight.
 6 Q. And I think some of the locals brought you some --
 7 A. Yes the guys who were next door to us they brought us,
 8 I think it was some biscuits and I think maybe a carton
 9 of juice or something like that and in between that Ian
 10 obviously just lives in the row next to us, he went with
 11 one of the local guys because he had just come on the --
 12 just come on the Monday so he had a load of food that he
 13 had brought with him. So we made an educated guess we
 14 were going to be there for a while so we made sure that
 15 as best you can that the coast was clear, as much as we
 16 could, and he made a dash for it across and filled a bag
 17 full of food of just like dried fruit and biscuits and
 18 a couple of bottles of water and then ran back over to
 19 my room.
 20 Q. I think you expressed the view in your witness statement
 21 that not all the locals were being helpful to you. Did
 22 you think that some of the nationals were assisting the
 23 terrorists?
 24 A. That's my opinion. How otherwise did they know where we
 25 lived? How did they know where I stayed?
 Page 30

1 Q. Can I just ask you about why you think that because as
 2 I say, you have that opinion?
 3 A. Yes.
 4 Q. What is it that you --
 5 A. Just for the simple fact that if they had -- they were
 6 there for two days. How much bullets or how much
 7 ammunition can you carry on the back of a lorry or back
 8 of a truck or whatever and fight an army for two days if
 9 you haven't had help from someone else?
 10 Q. So there's supposition on your part. Did you see
 11 anything?
 12 A. No, that's just my opinion. My opinion. Like I say,
 13 they weren't all bad because if it wasn't for the locals
 14 I might still be sat there. They helped me get out. So
 15 they aren't all bad.
 16 Q. Because -- we are coming to you getting out. I think
 17 you stayed in your room overnight?
 18 A. Yes.
 19 Q. And then what happened the next day?
 20 A. The next day was much like the day before. Just
 21 plenty -- just shooting, gunfire backwards and forwards.
 22 Helicopter, the helicopter was going over continuously
 23 from about 9 o'clock the first morning throughout the
 24 first day, second day and then roughly about halfway
 25 through the first day -- the second day, sorry, there
 Page 31

1 was three big explosions. That's when it all kind of
 2 kicked off on the second day, on the afternoon.
 3 Q. You say on the afternoon. Are you able to be any more
 4 precise about the time?
 5 A. I can't really remember off the top of my --
 6 Q. You say you heard big explosions. Can you describe what
 7 you were hearing?
 8 A. It sounded like it was bombs getting dropped off. It
 9 felt like my cabin had lifted off the floor. I was
 10 curled up on the bed. Ian had more or less dived from
 11 the chair to go under my bed. It had felt like the bomb
 12 had dropped on our doorstep. That's what it felt like.
 13 Even though it was over at the BdV.
 14 Q. Was that where it was coming from, the sounds?
 15 A. It was always coming from like that kind of direction
 16 because that's where the terrorists were based.
 17 Q. After that time when you heard the big explosions, what
 18 happened next?
 19 A. That went on for roughly about half an hour, three
 20 quarters of an hour and then it went quiet for a period
 21 of time and the guys next door, we looked out the
 22 window, and they were outside with a white towel and an
 23 Algerian flag waving it at the helicopter.
 24 Q. I think you said in your witness statement that was
 25 around about 2 or 3 o'clock?
 Page 32

<p>1 A. Yes.</p> <p>2 Q. Is that --</p> <p>3 A. Somewhere around that sort of time, yes. Obviously</p> <p>4 saying that -- trying to indicate that there was people</p> <p>5 there and to come and get us really.</p> <p>6 Q. They were waving to the helicopter?</p> <p>7 A. Yes.</p> <p>8 Q. Had you heard helicopters before that?</p> <p>9 A. Yes, literally from 9 o'clock the first day.</p> <p>10 Q. Anything else in the sky you had heard noises from</p> <p>11 the --</p> <p>12 A. It sounded like a -- obviously I never saw a drone but</p> <p>13 it was like a droning noise constant all the time.</p> <p>14 Q. Can I just ask you about that? When you say there was</p> <p>15 a droning noise?</p> <p>16 A. Yes.</p> <p>17 Q. Do you know what a drone would sound like?</p> <p>18 A. No, I would not have a clue.</p> <p>19 Q. But you heard a noise. Can you describe the noise?</p> <p>20 A. Just like a continuation of a helicopter cum dull</p> <p>21 whirring noise.</p> <p>22 THE CORONER: That's what you thought, that's the noise the</p> <p>23 helicopter was making?</p> <p>24 A. Yes, but it was just constantly all the time.</p> <p>25 MS DOLAN: And then you described how the Algerians were</p> <p style="text-align: center;">Page 33</p>	<p>1 really had a choice really so we decided to stop in our</p> <p>2 room and that was a low point because obviously at this</p> <p>3 point we thought that was just me and Ian at that point.</p> <p>4 So the guy I said he took my surname and said "right I'm</p> <p>5 going to get the army or the military or the Gendarmes"</p> <p>6 or whoever. He said "I'll come back for you". So</p> <p>7 obviously I'm putting a lot of faith in this guy to come</p> <p>8 back and get us and off he went.</p> <p>9 Q. I think it took some time before somebody came back?</p> <p>10 A. Yes, yes, it was a few hours, yes.</p> <p>11 Q. Then eventually somebody did return with the military?</p> <p>12 A. Yes.</p> <p>13 Q. And was that when you were taken out of the companies</p> <p>14 camp?</p> <p>15 A. Yes, it was.</p> <p>16 Q. And rescued?</p> <p>17 A. Mmm.</p> <p>18 Q. Where did they take you to once they had --</p> <p>19 A. To VCP1.</p> <p>20 Q. When you got to VCP1 what did you see?</p> <p>21 A. Body bags, people cut in half.</p> <p>22 Q. So you saw some of --</p> <p>23 A. Yes.</p> <p>24 Q. Did you assume these were terrorists?</p> <p>25 A. Assumed? There was people that were badly, badly burnt.</p> <p style="text-align: center;">Page 35</p>
<p>1 waving to try and get the attention of the helicopter.</p> <p>2 A. Yes.</p> <p>3 Q. And what happened after that?</p> <p>4 A. They decided that they were going to go. So they packed</p> <p>5 up their stuff and --</p> <p>6 Q. When you say "they". Is this the chap who was in the</p> <p>7 room next to door to you who had been assisting you?</p> <p>8 A. Yes, they couldn't provide any more information because</p> <p>9 they didn't know any information. So they decided they</p> <p>10 were going to go. There was about four or five of them</p> <p>11 that were in the cabin, that they came and obviously saw</p> <p>12 us and said we're going to go. So me and Ian said we're</p> <p>13 not stopping here on our own, because at this point we</p> <p>14 didn't know who was left, who wasn't left, if we were</p> <p>15 going to be the only people left in the companies camp,</p> <p>16 whatever, because the telephone signals stopped working</p> <p>17 on the first day at roughly about 5 o'clock so we had</p> <p>18 had no contact from anyone at all from that sort of time</p> <p>19 on the first day.</p> <p>20 So we didn't know any more new information. So our</p> <p>21 response was right, well if you're going, we're coming</p> <p>22 with you, kind of thing. Their reply was no, you're</p> <p>23 stopping here. We can't go and take you with us because</p> <p>24 if the terrorists are there and they see you with us</p> <p>25 then we'll all get shot. So we said okay, we never</p> <p style="text-align: center;">Page 34</p>	<p>1 There was about 12, 13 body bags. You couldn't --</p> <p>2 I couldn't say if they were terrorists, I couldn't</p> <p>3 see -- they could have been anyone to me.</p> <p>4 Q. I think you thought there might be a terrorist alive at</p> <p>5 that stage?</p> <p>6 A. There was, yes. There was one in --</p> <p>7 Q. What made you think that?</p> <p>8 A. Because the police told us so. The Algerian police</p> <p>9 pointed him out in the back of a van in one of the -- in</p> <p>10 the back of one of the police vans and they put us in</p> <p>11 another police van.</p> <p>12 Q. So you say they pointed them out. They showed him to</p> <p>13 you?</p> <p>14 A. Mmm.</p> <p>15 Q. What if anything did they say about that?</p> <p>16 A. He just said that's one of the terrorists in the back of</p> <p>17 the van. That's one we've captured.</p> <p>18 Q. Was this the Gendarmes or was this the military?</p> <p>19 A. That was the military police.</p> <p>20 Q. Did they say anything else to you about the events?</p> <p>21 A. No, we had our photos taken, we went through a few</p> <p>22 questions that they asked, passports were taken and we</p> <p>23 were put to one side in the back of this military jeep.</p> <p>24 Then we were there for a while and a couple of the</p> <p>25 Gendarmes got in the car and were just having a bit of</p> <p style="text-align: center;">Page 36</p>

<p>1 just like toing and froing between, light conversation 2 and then we got moved from there to a bus. 3 Q. Do you recall the Algerian military saying anything to 4 you about the nationality of the terrorists? 5 A. I do. 6 Q. What was that? 7 A. No, not the Gendarmes, no. On the bus, when I was on 8 the bus the guy that helped me get out, I spotted him on 9 the bus and I went over and talked to him obviously. 10 Thanked him immensely for what he'd done and then he 11 said that they were very upset that obviously it had 12 happened in Algeria but even more so they were ashamed 13 that it happened in Algeria and none of the terrorists 14 who were, from what he was saying, were Algerian. 15 Q. Just to be clear, this is the chap who was in charge of 16 the companies camp? 17 A. Yes. 18 Q. The national, one of your coworkers essentially? 19 A. Mmm. 20 Q. And he was telling you that from who? 21 A. He was telling us that from what he had been told that 22 there was multi-national terrorists and none of them 23 were actually from Algeria, but this is just what this 24 guy had told me. 25 Q. Do you recall what you said in your witness statement</p> <p style="text-align: center;">Page 37</p>	<p>1 to stop it. That is what this guy was saying to me. 2 Q. So it wasn't the military saying that to you? 3 A. Yes. 4 Q. It was again the colleague in charge of the companies 5 camp. What did he say? 6 A. He said they were ashamed it had happened in Algeria and 7 even more so that none of the -- that's it's happened on 8 their own sort of -- in Algeria and there was nothing 9 they could have done about it sort of thing. 10 Q. And then I think you were taken away from the area. You 11 were reunited with Mark at some point? 12 A. I was, yes. When we got to the, I can't remember what 13 it was called now, is it the police base in In Amenas, 14 military base in In Amenas? Mark was there, Mark Grant 15 was there. 16 Q. And how had he got out? 17 A. Mark, Mark had -- there was like mosquito net across the 18 bathroom window down at the companies camp extension. 19 He had knocked that out and been sticking his head out 20 to see who was going past and he had spotted one of the 21 military and he had kind of stuck his arm out and waved 22 him down. The guy had come over and basically just said 23 I can't take you out because obviously we're doing what 24 we're doing kind of thing, but there's a hole in the 25 fence over there. If you go I'll point you in that sort</p> <p style="text-align: center;">Page 39</p>
<p>1 was that he told you the nationalities. Can you 2 remember what they were? 3 A. Yes, one was Canadian, some are from Mali. I think he 4 said one was English-speaking. I can't remember the 5 others. 6 Q. I think at the time what you said is you were told one, 7 if I read it all: 8 "They said one Canadian, one English, one Spanish, 9 one Syrian, one from Tunisia and some from Mali." 10 Is that -- 11 A. If that's what I said that would be correct as the 12 information he gave me. 13 Q. Did you get some kind of impression of what the 14 military's attitude was? 15 A. At the time obviously my outlook on the military was 16 that I was a little bit blinded by the military because 17 the military had come in and saved me, so my outlook at 18 that time was although they had been -- gone in and gone 19 gung ho they had got obviously myself and Ian out. What 20 can I say? It's ... 21 Q. Do you recall you said in your witness statement that 22 the military were very, very ashamed you thought? 23 A. Yes, but it -- 24 Q. What was that about? 25 A. That it had happened in Algeria and them not being able</p> <p style="text-align: center;">Page 38</p>	<p>1 of direction, you go, go through that hole and kind of 2 just make a run for it. So that's what Mark did. He 3 ended up in a tank. 4 Q. I think some time later after you got home you spoke on 5 the phone with Joseph Balmaceda? 6 A. Yes. 7 Q. Do you recall what he said to you? 8 A. I don't, no, not off the top of my head. 9 Q. And you spoke with Stephen McFaul? 10 A. Yes. 11 Q. Again, do you recall? 12 A. Possibly, no, that was a long long time ago. 13 Q. It was a long time ago. You made another statement 14 in September 2013? 15 A. Right. 16 Q. Again, and you said at that time you spoke with 17 Stephen McFaul and Joseph Balmaceda who we know both had 18 been held hostage and they told you that some of the 19 terrorists had previously worked on the site in low 20 level positions as chefs and drivers? 21 A. Yes. 22 Q. Now I have jogged your memory can you remember any more 23 about that? 24 A. Obviously that's just information that was passed on to 25 myself. Like I say, I don't know if it was true or not,</p> <p style="text-align: center;">Page 40</p>

<p>1 but that's just information that was passed on to us,</p> <p>2 so ...</p> <p>3 Q. Was it both Joseph and Stephen McFaul who said that?</p> <p>4 A. Yes.</p> <p>5 Q. Not one of them?</p> <p>6 A. No.</p> <p>7 MS DOLAN: Mr Matthews, thank you very much for your help.</p> <p>8 I haven't any more questions for you but there will be</p> <p>9 from the other barristers.</p> <p>10 A. Okay, no problem.</p> <p>11 Questions from MR SHARGHY</p> <p>12 MR SHARGHY: Mr Matthews, my name is Sharam Sharghy. I am</p> <p>13 representing the family of Carlos Estrada. There are</p> <p>14 only two distinct areas I would like to ask you some</p> <p>15 questions about. The first is in relation to the</p> <p>16 drivers strike. You were aware of that, weren't you?</p> <p>17 A. Yes.</p> <p>18 Q. And you have mentioned in your police witness statement</p> <p>19 that you found it quite surprising that they were paid</p> <p>20 for the duration in full that they were on strike for?</p> <p>21 A. So I was led to believe, yes.</p> <p>22 Q. And that they were operating on what you have described</p> <p>23 as being minimum service?</p> <p>24 A. Yes.</p> <p>25 Q. Then you go on to say that "the minimum service, which</p> <p style="text-align: center;">Page 41</p>	<p>1 they wanted but we were all told, not officially, but</p> <p>2 that they weren't going to kind of get what they were</p> <p>3 asking for.</p> <p>4 Q. What was your feeling as to their views towards the</p> <p>5 expats?</p> <p>6 A. I don't know. That's a tough question for me to answer.</p> <p>7 They were always okay with me. That's ...</p> <p>8 Q. Garry Barlow wrote an email which is before the inquest</p> <p>9 which suggests that he was aware of a threat having been</p> <p>10 made to the lives of expats if one of the hunger</p> <p>11 striking drivers was to die. Were you aware of that?</p> <p>12 A. No, I was aware that they were going on hunger strike</p> <p>13 but I wasn't aware obviously of the information you have</p> <p>14 just said there.</p> <p>15 Q. Were you aware of any threats having been made by the</p> <p>16 strikers against expats?</p> <p>17 A. No.</p> <p>18 Q. In relation to the services that the drivers used to</p> <p>19 provide before they went on strike you mention in your</p> <p>20 police statement that there was a shuttle bus</p> <p>21 effectively running every ten minutes between BdV and</p> <p>22 the CPF?</p> <p>23 A. Yes.</p> <p>24 Q. But that stopped completely during the strike?</p> <p>25 A. I'm trying to remember now if it did or not. (Pause)</p> <p style="text-align: center;">Page 43</p>
<p>1 was needed to not be deemed a hostage situation". Can</p> <p>2 I just ask you a series of questions in relation to</p> <p>3 that?</p> <p>4 A. Yes.</p> <p>5 Q. That is quite a powerful term to use?</p> <p>6 A. Yes.</p> <p>7 Q. Was that your opinion?</p> <p>8 A. Yes.</p> <p>9 Q. Or was it what someone else had said to you?</p> <p>10 A. That was -- "hostage situation" looking back at it was</p> <p>11 probably a bad word to use for the statement. That was</p> <p>12 the minimum service that was required so it was deemed</p> <p>13 that people could get out so that they could get them to</p> <p>14 the airport and there wasn't a means of getting out if</p> <p>15 something did happen.</p> <p>16 Q. Would you say that the atmosphere changed as between the</p> <p>17 expats and the drivers and anyone else who was on</p> <p>18 strike?</p> <p>19 A. Yes, I would say that, yes.</p> <p>20 Q. And how did it change?</p> <p>21 A. You could see that obviously the drivers were obviously</p> <p>22 on strike, they were on strike for a long period of time</p> <p>23 and they just used to sit in the car park every day and</p> <p>24 you could see that they weren't happy with the</p> <p>25 conditions and they were striving to get something which</p> <p style="text-align: center;">Page 42</p>	<p>1 I can't 100 per cent say it did. I can't remember if it</p> <p>2 used to be on for a lunchtime or not. I can't</p> <p>3 100 per cent say that it did.</p> <p>4 Q. How would you mostly get during the strike from the BdV</p> <p>5 to the CPF and back?</p> <p>6 A. I would usually get a lift with Stevie McFaul.</p> <p>7 Q. And was this for the duration of the strike?</p> <p>8 A. Yes. Well the duration of my trip.</p> <p>9 Q. Yes, but over the period that the strike was taking</p> <p>10 place?</p> <p>11 A. Yes.</p> <p>12 Q. The second point I would like to discuss with you is</p> <p>13 regarding insider help. You have told Ms Dolan earlier</p> <p>14 on that your feeling was how are they coming by all of</p> <p>15 this ammunition and continuing to shoot for so long?</p> <p>16 But in your police statement, and this is at page 17,</p> <p>17 what you say is:</p> <p>18 "Later it came out or come out that they'd been on</p> <p>19 site previously and buried all the gear."</p> <p>20 Can I just ask you how you come by that information?</p> <p>21 A. This is just what we discussed between myself and</p> <p>22 a couple of colleagues. I don't know if that was fact.</p> <p>23 This is just something that we discussed or --</p> <p>24 Q. Sorry?</p> <p>25 A. Yes, carry on.</p> <p style="text-align: center;">Page 44</p>

<p>1 Q. I was going to ask, were these expat colleagues or were 2 they nationals as well? 3 A. Expat colleagues. 4 THE CORONER: Can you just help, was that an idea that was 5 generated amongst yourselves -- 6 A. Yes. 7 THE CORONER: -- without as it were, knowing that was the 8 case or had it come from somebody who appeared to know 9 that? Do you see the difference? 10 A. Yes, I do, yes. It was just of our -- well I can't say 11 for definite but that was just of our opinion. 12 THE CORONER: Thinking about -- 13 A. How it would be possible that a terrorist that came on 14 a couple of 4 by 4s effectively could face an army as 15 such if they've only come in 4 by 4s across a desert. 16 MR SHARGHY: Mr Matthews, thank you. 17 A. Thank you. 18 Questions from MR OWEN-THOMAS 19 MR OWEN-THOMAS: Mr Matthews, my name is Owen-Thomas. 20 I have questions on behalf of David Green, the father of 21 Stephen Green. 22 I just have a couple of questions for you. Ms Dolan 23 has already asked you a little bit about the Gendarme 24 patrols on the site and you have given your answers in 25 respect of that. Can you help with a couple of points. Page 45</p>	<p>1 Q. You mentioned earlier about the fence which surrounds 2 the BdV. And in particular, the fence which surrounds 3 the football pitch. 4 A. Yes. 5 Q. As I understand it, I think there are two football 6 pitches, an astroturf pitch and an actual pitch. Is 7 that right? 8 A. Yes. 9 Q. Which one of the two -- 10 A. The astroturf. 11 Q. You are you talking about the astroturf. We can see 12 that in there, the green? 13 A. Yes. 14 Q. The fence you were talking about you could scramble 15 under to retrieve the ball, that was an inner fence? 16 A. An inner fence. 17 Q. Directly between the football pitch and the -- 18 A. This part of the -- that comes out here. (indicated) 19 Q. Was that the only fence at that point? 20 A. I think there was a fence at the front and a fence at 21 the back. 22 Q. But if you were to walk, north I think it is, if you 23 were on the football pitch playing up the pitch, as you 24 look at that photo, if you walk to your left you come to 25 a fence fairly soon. But that's the only fence you'd Page 47</p>
<p>1 I think you said you had been on the site for about two 2 to three years? 3 A. Two years, just short of two years, yes. 4 Q. Had you seen any change in the level of Gendarme patrol 5 or was it always the case that there was none at all? 6 A. It -- like I say, I just saw the Gendarmes really when 7 you were going backwards and forwards to In Amenas and 8 when you used to pass the Gendarmerie camp, the Gendarme 9 camp. 10 Q. You mentioned earlier that you sometimes worked night 11 shifts? 12 A. Yes. 13 Q. And where did you work when you were working nights? 14 A. On the CPF. 15 Q. Would you see any Gendarme patrols as you travelled to 16 and from the CPF in the morning or the evening towards 17 the night shift? 18 A. No. 19 Q. When you were working at the CPF would you have been 20 able to see if there were vehicles patrolling around the 21 perimeter of the CPF, do you think? 22 A. I never really paid much attention to it if I'm honest. 23 Q. So if I was to ask you, did you actually see anything 24 patrolling around the CPF? 25 A. My answer would be no. Page 46</p>	<p>1 come to unless you walked all the way through the 2 companies camp, is that right? 3 A. Yes. 4 MR OWEN-THOMAS: Thank you very much. 5 Questions from MS GERRY 6 MS GERRY: Mr Matthews, good morning, I ask questions on 7 behalf of the family of Sebastian John. 8 Can I just ask first of all, you obviously played 9 football quite regularly. Did you ever play with 10 Sebastian, did you meet him? 11 A. I did, yes. 12 Q. Was that something you regularly did in the evening 13 together? 14 A. Evenings and lunch. 15 Q. Can I then just ask you, when you'd go to your football, 16 while we are talking about football, would you leave 17 from your accommodation in the companies camp and would 18 you go after dinner from the restaurant area? 19 A. I would go -- I never used to have dinner. I used 20 always go back to my room and then walk from my room 21 from the companies camp up and around and back down to 22 the football pitch. 23 Q. So you would go up through the second gate, the inner 24 gate that we have been discussing? 25 A. Yes, up through, from here up and around across the Page 48</p>

<p>1 blacktop and down this way and then back (indicated).</p> <p>2 Q. From your statement you suggested that the number of,</p> <p>3 and I think you said British, but it may be expats, in</p> <p>4 the companies camp were 5 to 10 per cent, does that</p> <p>5 sound about right?</p> <p>6 A. Something around about there. Maybe a bit less I was</p> <p>7 maybe being -- but round about that, yes.</p> <p>8 Q. Your row or your area where you were in companies camp,</p> <p>9 was there anybody else directly either side of you that</p> <p>10 was an expat?</p> <p>11 A. Yes, there was Ian.</p> <p>12 Q. Ian is the next door?</p> <p>13 A. He was the next one, he was in O.</p> <p>14 Q. So when you describe there was somebody outside you</p> <p>15 could hear footsteps and they seemed to be coming</p> <p>16 directly to your doors you had the very distinct</p> <p>17 impression that they were coming very directly and</p> <p>18 deliberately to where expats were?</p> <p>19 A. Yes.</p> <p>20 Q. Did you have any telephones in your rooms, any</p> <p>21 landlines?</p> <p>22 A. Yes, there was, yes.</p> <p>23 Q. And who could you call on that? Were there internal</p> <p>24 extension numbers?</p> <p>25 A. There were internal and also outside lines but as soon</p> <p style="text-align: center;">Page 49</p>	<p>1 A. Yes, worked in Ghana, Croatia, Oman.</p> <p>2 Q. This is the only place --</p> <p>3 A. Algeria.</p> <p>4 Q. -- that ever had an armed guard from the airport to the</p> <p>5 place of work?</p> <p>6 A. Russia.</p> <p>7 Q. Although you say you weren't told in your induction</p> <p>8 anything of the region or the area did you feel that</p> <p>9 this was an area you were working in that was risky,</p> <p>10 high risk and if so from what?</p> <p>11 A. No, I never -- I don't know if it was just because I'd</p> <p>12 been there for a period of time and you get used to what</p> <p>13 the protocol was, you obviously landed in In Amenas</p> <p>14 airport, you went through customs, you came out, you</p> <p>15 just got used to that's how it happened and then</p> <p>16 everything was there, you got on the bus. The Gendarmes</p> <p>17 were there. Three in front usually, three behind</p> <p>18 usually and that was it. Off you went. If you thought</p> <p>19 too much about it you would probably never go to these</p> <p>20 places.</p> <p>21 Q. Where did the drivers live or stay? Did they stay on</p> <p>22 the base as well or on the facility?</p> <p>23 A. I don't know because I never really paid much attention</p> <p>24 to that.</p> <p>25 Q. Just going back, you mentioned that there was this</p> <p style="text-align: center;">Page 51</p>
<p>1 as the power was cut --</p> <p>2 Q. They didn't work?</p> <p>3 A. -- that was it, it was gone.</p> <p>4 Q. Was there any emergency number you could call from your</p> <p>5 landlines in your room?</p> <p>6 A. Obviously when the power was cut then that was --</p> <p>7 Q. But generally speaking were you told, if there's an</p> <p>8 emergency dial 9 or something of that order?</p> <p>9 A. Not that I can recall. There was an emergency channel</p> <p>10 on the radio but obviously in your room you didn't have</p> <p>11 a radio.</p> <p>12 Q. Did you carry a radio when you were out at work when you</p> <p>13 were at the CPF?</p> <p>14 A. No.</p> <p>15 Q. Did you ever carry a radio?</p> <p>16 A. Very seldom.</p> <p>17 Q. I'm sorry if I am jumping around but I just want to pick</p> <p>18 up a few points. In your statement you mentioned you</p> <p>19 had never before worked somewhere where you required an</p> <p>20 armed guard?</p> <p>21 A. Yes.</p> <p>22 Q. Have you worked abroad before?</p> <p>23 A. Yes.</p> <p>24 Q. Can you give us an idea of the sorts of places you</p> <p>25 previously worked?</p> <p style="text-align: center;">Page 50</p>	<p>1 second gate which I think you said was the original gate</p> <p>2 when the companies camp or when the facility was being</p> <p>3 built?</p> <p>4 A. Yes.</p> <p>5 Q. And you mentioned that that would be used if -- it was</p> <p>6 used very rarely but would be used if the main gate</p> <p>7 wasn't being used?</p> <p>8 A. Yes.</p> <p>9 Q. For what reason would the main gate not be being used?</p> <p>10 A. There was once when I was there we had to use that</p> <p>11 second gate but it was when the main road was getting</p> <p>12 re-tarmacked and that was the reason why.</p> <p>13 Q. Can you recall from that time what type of gate it was</p> <p>14 that was at that entrance?</p> <p>15 A. Similar to what was at the other, it was just like the</p> <p>16 fence was the same and the gate was the same.</p> <p>17 Q. Was it a sliding gate?</p> <p>18 A. Yes.</p> <p>19 Q. And was there a vehicle barrier as well?</p> <p>20 A. I can't remember off the top of my head.</p> <p>21 Q. In relation to the gate that was at the inner entrance</p> <p>22 point to the BdV, so you described you had the</p> <p>23 pedestrian gate and then there was a vehicle gate which</p> <p>24 you said was always shut and someone had to come out</p> <p>25 from the guardhouse and open it, if you can't recollect</p> <p style="text-align: center;">Page 52</p>

<p>1 don't worry, I can ask someone else --</p> <p>2 A. Yes.</p> <p>3 Q. -- but are you able to help with how that -- it is</p> <p>4 a swing gate, how it was unlatched or unlocked. If you</p> <p>5 can't remember?</p> <p>6 A. I can't remember, no, no. Sorry.</p> <p>7 Q. Just my final question: you returned to In Amenas</p> <p>8 I think on 2 January, is that right?</p> <p>9 A. That's correct, yes.</p> <p>10 Q. When were you told that you were going to be going back</p> <p>11 on the 2 January?</p> <p>12 A. I think the strike finished on the 13th December, if</p> <p>13 I can recall.</p> <p>14 Q. That is the evidence we have so far had.</p> <p>15 A. Then it was an issue of toing and froing whether or not</p> <p>16 I was actually going to have Christmas or New Year off</p> <p>17 or go back after the new year and it just got decided</p> <p>18 that I was going to have Christmas and New Year off and</p> <p>19 go back in the new year.</p> <p>20 Q. When would you have gone back but for the strike?</p> <p>21 A. I can't -- I don't know.</p> <p>22 Q. It would have been prior to the date you did go back?</p> <p>23 A. It would have been, yes, yes, because I stopped --</p> <p>24 I think it was some time in October.</p> <p>25 Q. Finally, when you were rescued by the military and they</p> <p style="text-align: center;">Page 53</p>	<p>1 Q. I don't know if you can see on this map, so you can see</p> <p>2 there's the orange horizontal line which is marked as</p> <p>3 the inner gate?</p> <p>4 A. Yes.</p> <p>5 Q. Can you see just below that there's sort of a white</p> <p>6 similar shaped size block?</p> <p>7 A. Yes.</p> <p>8 Q. We have seen pictures that would indicate that that is</p> <p>9 a bus?</p> <p>10 A. Right.</p> <p>11 Q. Can you recall when you came out with the military</p> <p>12 whether there was a bus there?</p> <p>13 A. When I came out it was a big military bus like --</p> <p>14 Q. Can I ask --</p> <p>15 A. Like a Kamas</p> <p>16 Q. NAS 20 and then it is --</p> <p>17 THE CORONER: It is on your screen now.</p> <p>18 A. Right.</p> <p>19 MS GERRY: As we understand it, that is the -- I think to</p> <p>20 the left-hand side, is that the pedestrian gate you have</p> <p>21 been describing? Can I just --</p> <p>22 A. Yes, that's it, yes.</p> <p>23 Q. And then if we go behind the bus can you see it looks</p> <p>24 like a gate which looks to be very similar to --</p> <p>25 THE CORONER: You see at the back of the bus it looks like</p> <p style="text-align: center;">Page 55</p>
<p>1 drove -- they drove you out of the --</p> <p>2 A. No.</p> <p>3 Q. How did you get out?</p> <p>4 A. They went down to, because I told them Mark Grant's room</p> <p>5 number. They went down to get Mark and Mark wasn't</p> <p>6 there. They just brought me back his pass, we all had</p> <p>7 a pass. I put -- they collected another two expats, two</p> <p>8 guys. Then they surrounded us, they basically said</p> <p>9 "right that's it, we're going." So we were all in the</p> <p>10 middle with our little bags and they surrounded us and</p> <p>11 then obviously they were pointing their guns as we were</p> <p>12 kind of moving towards the outer and inner gate across</p> <p>13 the --</p> <p>14 Q. So you exited through the A and B area, did you?</p> <p>15 A. Yes, yes.</p> <p>16 Q. You obviously wouldn't have had to have gone through the</p> <p>17 inner security gate?</p> <p>18 A. Yes, we went through the gate, actually the car gate.</p> <p>19 So where the inner gate is, not -- you know where it</p> <p>20 points to the inner gate, at the top?</p> <p>21 Q. Sorry. If you have -- yes.</p> <p>22 A. Yes, that's the gate that we went through. We came up</p> <p>23 through the companies camp and then across the top and</p> <p>24 then out of the inner gate and then out of the outer</p> <p>25 gate.</p> <p style="text-align: center;">Page 54</p>	<p>1 the gate is in the open position and the bus is in the</p> <p>2 way, maybe.</p> <p>3 A. Yes.</p> <p>4 MS GERRY: So when you came out with the military can you</p> <p>5 recall whether that bus was there then or not?</p> <p>6 A. That bus wasn't there.</p> <p>7 Q. It wasn't there?</p> <p>8 A. Not that I can recall anyway.</p> <p>9 Q. Obviously your memory may not -- may be better or</p> <p>10 otherwise. I think you said when I was asking you</p> <p>11 questions there was a military vehicle around?</p> <p>12 A. Yes, a lot bigger than that was parked and from what</p> <p>13 I remember in the car park facing the outer gate. We</p> <p>14 got on that.</p> <p>15 Q. That bus, is that the type of bus that was used to ferry</p> <p>16 people between the BdV and the CPF?</p> <p>17 A. Yes, that was one kind of bus, yes.</p> <p>18 MS GERRY: Thank you, I have no further questions?</p> <p>19 A. Thank you.</p> <p>20 Questions from MS GOLLOP</p> <p>21 MS GOLLOP: My name is Katie Gollop, I am asking questions</p> <p>22 on behalf of Stephen Green's wife. I just want to ask</p> <p>23 you one thing. In your witness statement you talk about</p> <p>24 a particularly noisy period of activity that happened in</p> <p>25 the middle of one day and what you say about that is</p> <p style="text-align: center;">Page 56</p>

<p>1 this:</p> <p>2 "The massive battle was the terrorists trying to</p> <p>3 take the hostages out of vehicles. That's when all the</p> <p>4 shooting was and that's when it all came out in the news</p> <p>5 that the Algerian government had just basically blown</p> <p>6 all these vans up and that's when it went quiet again</p> <p>7 after that."</p> <p>8 Can you tell us what you mean by "information coming</p> <p>9 out on the news"?</p> <p>10 A. Obviously when we got back to the UK we just saw, and</p> <p>11 obviously recollections from what I'd heard from what</p> <p>12 the other survivors, that obviously the -- this is just</p> <p>13 what I've heard from other people.</p> <p>14 Q. Is this something you have been told by other people who</p> <p>15 were there at the time?</p> <p>16 A. That's right, yes.</p> <p>17 MS GOLLOP: I won't ask you any more. Thank you very much.</p> <p>18 A. Okay.</p> <p>19 Questions from MR FLINN</p> <p>20 MR FLINN: Mr Matthews, my name is Matthew Flinn and I ask</p> <p>21 questions on behalf of the families of Garry Barlow,</p> <p>22 Carson Bilsland, Paul Morgan and Kenneth Whiteside.</p> <p>23 Just a small number of questions for you. I think you</p> <p>24 indicated in your earlier evidence that you hadn't been</p> <p>25 told what to do in a terrorist situation and I think you</p> <p style="text-align: center;">Page 57</p>	<p>1 Q. Can you recall how frequently they occurred?</p> <p>2 A. I can't, no, no I can't answer that question.</p> <p>3 Q. Can you recall how you were notified of those meetings</p> <p>4 taking place?</p> <p>5 A. You would be told on an afternoon and literally that</p> <p>6 afternoon there would be a town hall meeting up at the</p> <p>7 BdV.</p> <p>8 Q. I think you explain in the statement you gave to the</p> <p>9 police and you have told us in evidence this morning</p> <p>10 that you were an employee of a company called ABB. Is</p> <p>11 that correct?</p> <p>12 A. ABB SARPI, yes.</p> <p>13 Q. And you were subcontracted through another company</p> <p>14 called SARPI?</p> <p>15 A. Yes, SARPI was the subcontractor for the JV.</p> <p>16 Q. Were you provided with any information about the</p> <p>17 security situation in Algeria or the security risks</p> <p>18 involved with working at In Amenas by either ABB or</p> <p>19 SARPI before you mobilised?</p> <p>20 A. No.</p> <p>21 Q. Did any of the JV participating companies, and by that</p> <p>22 I mean BP, Statoil and Sonatrach, did any of them</p> <p>23 provide you with any information about those topics</p> <p>24 before you mobilised?</p> <p>25 A. Not that I can recall, no. There was a pack that comes</p> <p style="text-align: center;">Page 59</p>
<p>1 also said the induction you went through didn't give you</p> <p>2 any information about the region generally, is that</p> <p>3 correct?</p> <p>4 A. That's correct, yes.</p> <p>5 Q. I think you also said to Ms Gerry that you didn't feel</p> <p>6 it was risky working on the site based on the</p> <p>7 information you had?</p> <p>8 A. Yes, based on the information that I was given.</p> <p>9 Q. Were you told about the security risks involved with</p> <p>10 working at the In Amenas site at any other time whilst</p> <p>11 you were there?</p> <p>12 A. No.</p> <p>13 Q. Were you given any information about the security</p> <p>14 situation in Algeria generally at any other time whilst</p> <p>15 you were on site?</p> <p>16 A. No.</p> <p>17 Q. Now the coroner may hear some evidence in due course</p> <p>18 from other witnesses about some town hall style meetings</p> <p>19 that would happen on site now and again at which workers</p> <p>20 could raise questions including about security matters.</p> <p>21 Do you recall those meetings?</p> <p>22 A. I used to attend not all of those town hall meetings,</p> <p>23 very few in fact. So I wasn't really there to pass</p> <p>24 judgment or to ask questions at those town hall</p> <p>25 meetings.</p> <p style="text-align: center;">Page 58</p>	<p>1 out of do's and don'ts but nothing -- obviously the</p> <p>2 terrorist threat, but not that I can recall.</p> <p>3 Q. The final topic I wanted to ask you about, Mr Matthews,</p> <p>4 is some of the texts you received from Mark Grant. In</p> <p>5 your statement to the police that you refer to receiving</p> <p>6 a text from Mark at 1 o'clock in the afternoon and</p> <p>7 I think that was on the 16th and the text went along the</p> <p>8 lines of:</p> <p>9 "I'm sound man. I'm fine. Derek and Kobian are in</p> <p>10 In Amenas hospital. Minor gunshot wounds. Paul in</p> <p>11 military camp safe. Paul Morgan apparently dead."</p> <p>12 Can you recall that?</p> <p>13 A. I can, yes.</p> <p>14 Q. I just wanted to ask about when it says "Paul in</p> <p>15 military camp" and then "safe" is that a different Paul</p> <p>16 to Paul Morgan which is being talked about?</p> <p>17 A. Yes.</p> <p>18 MR FLINN: Thank you very much.</p> <p>19 MR POPAT: No questions from BP.</p> <p>20 MR FERGUSON: Nor from Statoil.</p> <p>21 THE CORONER: Right. That's it. Thank you very much indeed</p> <p>22 for coming to help us, thank you.</p> <p>23 A. Thank you.</p> <p>24 (The witness withdrew)</p> <p>25 MS DOLAN: Sir, the next witness is Mr Andrew Christie. He</p> <p style="text-align: center;">Page 60</p>

15 (Pages 57 to 60)

<p>1 doesn't appear to be here.</p> <p>2 THE CORONER: What we'll do is take our 15-minute break now</p> <p>3 and he'll either be here and with us and we deal with</p> <p>4 him at the end of that or we'll go to the other</p> <p>5 witnesses if Mr Christie is not here.</p> <p>6 (11.16 am)</p> <p>7 (A short break)</p> <p>8 (11.35 am)</p> <p>9 MS DOLAN: Sir, Mr Christie isn't here yet so we'll hear</p> <p>10 from Mr Fitzpatrick and if Mr Christie arrives I wonder</p> <p>11 if we could interpose him at a convenient point.</p> <p>12 THE CORONER: Yes.</p> <p>13 MS DOLAN: Mr Fitzpatrick, please.</p> <p>14 MR ANTHONY JOSEPH FITZPATRICK (sworn)</p> <p>15 Questions from MS DOLAN</p> <p>16 MS DOLAN: Mr Fitzpatrick, I think you know I'm Bridget</p> <p>17 Dolan, I am asking questions on behalf of the coroner.</p> <p>18 Can you give us your full name please?</p> <p>19 A. It's Anthony Joseph Fitzpatrick.</p> <p>20 Q. At the time of these events what was your role at</p> <p>21 In Amenas?</p> <p>22 A. I was the OLS.</p> <p>23 Q. What does that mean in practice?</p> <p>24 A. Basically I managed or supervised the expat liaison</p> <p>25 team, the drivers, the military escort drivers and I was</p> <p style="text-align: center;">Page 61</p>	<p>1 A. Yes.</p> <p>2 Q. And together they have a JV called AFMC?</p> <p>3 A. Yes.</p> <p>4 Q. Just to be clear, because what we have heard of the JV,</p> <p>5 when we talk about the Statoil, Sonatrach, BP JV. AFMC</p> <p>6 itself is a JV between an Algerian company and a UK</p> <p>7 company?</p> <p>8 A. That's correct.</p> <p>9 Q. When you say you were employed by the JV you meant AFMC?</p> <p>10 A. Yes.</p> <p>11 Q. Can you explain the structure within AFMC as it relates</p> <p>12 to that liaison function?</p> <p>13 A. The structure as in the organogram for In Amenas?</p> <p>14 Q. Yes. For In Amenas and I think we will probably find</p> <p>15 some of the management tiers had after overview of other</p> <p>16 sides in Algeria as well.</p> <p>17 A. My line manager was in Hassi Messaoud. He was the</p> <p>18 Algerian liaison manager.</p> <p>19 Q. And who was that?</p> <p>20 A. That was John Wigg and Garry Butt.</p> <p>21 Q. So they are two in a back-to-back role?</p> <p>22 A. Yes.</p> <p>23 Q. So they are your line manager?</p> <p>24 A. Yes. Above them would be the shareholders security</p> <p>25 team -- sorry, the business support manager.</p> <p style="text-align: center;">Page 63</p>
<p>1 the primary contact between the JV management and the</p> <p>2 military.</p> <p>3 Q. And I think your back-to-back at the time was</p> <p>4 Paul Morgan?</p> <p>5 A. Yes, he was.</p> <p>6 Q. Can you help us by explaining, first of all, who</p> <p>7 employed you?</p> <p>8 A. I was employed by the JV.</p> <p>9 Q. By the JV?</p> <p>10 A. Yes, I was a contractor.</p> <p>11 Q. You were contracted?</p> <p>12 A. I was contracted to the JV by Sterling Limited.</p> <p>13 Q. And who are Sterling?</p> <p>14 A. Sterling are a security company, private security</p> <p>15 company.</p> <p>16 Q. And we understand there was a company known as AFMC or</p> <p>17 Algerian Facilities Management Company?</p> <p>18 A. That's correct.</p> <p>19 Q. How does that relate to Sterling?</p> <p>20 A. Originally it was a Sterling contract. It was then put</p> <p>21 over to an AFMC contract. It is a JV between Sterling</p> <p>22 and Redmed, Redmed Group.</p> <p>23 Q. And Redmed are an Algerian company?</p> <p>24 A. An Algerian company based in Hassi Messaoud.</p> <p>25 Q. And Sterling are a UK company?</p> <p style="text-align: center;">Page 62</p>	<p>1 Q. And the business support manager is who?</p> <p>2 A. Would have been Bill Johnson and Terry -- sorry, Bill</p> <p>3 Johnson, I forget the second guy's name.</p> <p>4 Q. And Bill Johnson, was he an AFMC employee?</p> <p>5 A. No, these are all shareholders staff.</p> <p>6 Q. So that is BP?</p> <p>7 A. BP. Yes.</p> <p>8 Q. So that is above your immediate seniors?</p> <p>9 A. Yes.</p> <p>10 Q. And then below you what is in the hierarchy or</p> <p>11 lowerarchy?</p> <p>12 A. Below me would be the operations liaison coordinators.</p> <p>13 Q. So that is OLC?</p> <p>14 A. OLC, exactly.</p> <p>15 Q. And that was on site at In Amenas?</p> <p>16 A. On site at In Amenas, yes.</p> <p>17 Q. Who was that at the time?</p> <p>18 A. At the time it was Yann Desyeux and Norman Lawlor.</p> <p>19 Q. And Norman Lawlor?</p> <p>20 A. Yes, they were at the CPF and we also had two OLCs on</p> <p>21 the rig site as well.</p> <p>22 Q. And they were?</p> <p>23 A. Which was Tom Martin and Marco Facini.</p> <p>24 Q. Was there anybody below them in the structure?</p> <p>25 A. No, that was it, as far as liaison were concerned.</p> <p style="text-align: center;">Page 64</p>

<p>1 Q. We hear this word "liaison" used but are we correct to 2 understand it really means security but one doesn't use 3 that title if you are a nonnational working in Algeria? 4 A. That's correct, the liaison function, the liaison title 5 was approved by the Algerian government but specifically 6 security for expats is forbidden for Algeria. 7 Q. So security has to be the function of Algerian 8 organisations? 9 A. Yes. 10 Q. And therefore you are called liaison but you are really 11 doing security? 12 A. Well, we're trying, we're trying. 13 Q. And how long had you been in that role in the In Amenas 14 project? 15 A. Since late 2004. 16 Q. So nine years at the time of the events? 17 A. Yes. 18 Q. Before you came to work there what was your past 19 experience, can you give us a brief synopsis of your CV? 20 A. Yes, well prior to that I spent one year with Bechtel 21 International in Algeria as a camp liaison manager and 22 prior to that I spent 17 and a half years in the Armed 23 Forces. 24 Q. And I think from being in the Armed Forces you were 25 fluent in French?</p> <p style="text-align: center;">Page 65</p>	<p>1 changed, security structure was changed and it was 2 handed over to Sonatrach. 3 Q. I will come back later on in your evidence to that 4 change because we do know something about that and 5 I will come back to that. But before your role was 6 changed how did you go about assessing the security 7 requirements? 8 A. We would carry out risk assessments. What we call task 9 risk assessments of the sites, of all the sites 10 basically and of all movements. That type of thing. 11 Q. How did you make decisions about what kind of risks 12 existed and managing them? Did you have -- did you do 13 that just from your experience or did you have other 14 ways you made those decisions? 15 A. Well we had input from the military obviously but mostly 16 from our experience. 17 Q. In making decisions about security requirements what 18 sources of information did you have? 19 A. Concerning? 20 Q. Well, any issues for security requirements. Clearly one 21 might be able to of course look around the site, see 22 what there was and take a professional view on what was 23 needed? 24 A. Yes. 25 Q. Did you have input of information from other sources as</p> <p style="text-align: center;">Page 67</p>
<p>1 A. Yes. 2 Q. Did you speak any Arabic? 3 A. I could understand a little. 4 Q. But if you communicated with the nationals what language 5 would then be used? 6 A. It was French. 7 Q. Did you have any communication difficulties when you 8 were speaking only in French with them? 9 A. Some of the Tuareg drivers don't speak French, don't 10 speak Arabic very well either, they just speak Targui 11 basically, their local language. So it's quite 12 difficult sometimes. 13 Q. That is with the drivers. What about if you are 14 communicating with the people at higher managerial 15 levels, with army commanders and -- 16 A. No, no problems. 17 Q. They were all fluent in French as well? 18 A. Yes. 19 Q. So can you expand a bit more about your role actually on 20 site in In Amenas. I know we have seen your witness 21 statement where you say your role was to assess security 22 requirements and advise on plans to meet the 23 requirements? 24 A. It was -- that was our original function until we 25 were -- until the powers of management structure was</p> <p style="text-align: center;">Page 66</p>	<p>1 well as what you were seeing yourself? 2 A. Yes, well we had a basic requirement -- the operational 3 requirements from the shareholders ie Sonatrach, Statoil 4 and BP and they were handed to us basically and we had 5 to make sure these were put in place by the contractor. 6 So we worked with the construction team to make sure 7 these systems were put in place. 8 Q. When you say operation requirements were they telling 9 you this is the security we want and you put it in place 10 or were they saying this is what we need to do and you 11 tell us what security we need for it? 12 A. No, no, this is what's going to be put in place just 13 ensure it is being put in place correctly. 14 Q. So from what you are saying it suggests that the 15 decisions about what the security facilities or 16 practices procedures or physical environment was, was 17 made by somebody other than you? 18 A. Oh yes. We weren't involved in the initial planning for 19 the security of In Amenas. That was done prior, prior 20 to BP acquiring the project. So basically it came as 21 a package, if you like. The whole package, the project 22 when BP bought out, I believe it was Alco, they bought 23 the project as well with the physical security measures 24 in place. 25 Q. But we understand that things changed over time, the</p> <p style="text-align: center;">Page 68</p>

17 (Pages 65 to 68)

<p>1 camp expanded, things were built and the context in 2 which you were working changed. So was there any 3 changes in security measures or procedures in response 4 to those changes? 5 A. Yes, we began a security upgrade once the situation in 6 Algeria deteriorated. In 2006 it got very bad when 7 vehicle borne IEDs began to be used in the country, 8 suicide bombing. So we began then a physical security 9 upgrade of the site. 10 Q. At that time decisions about upgrading the physical 11 security, how were they made? 12 A. They would be made with all the liaison team. Within 13 the liaison team we would recognise there was now 14 a threat within country and this would then, a 15 proposition would then be given by the Algerian liaison 16 manager to the business support manager and the 17 shareholders. 18 Q. So it sounds from what you are saying it is not your 19 final decision about whether the security measures are 20 put in place? 21 A. No, I'm afraid not. 22 Q. But you are in a position of advising people -- 23 A. Yes. 24 Q. -- about what security measures you believe there ought 25 to be?</p> <p style="text-align: center;">Page 69</p>	<p>1 embassy start. US embassy, UK embassy staff, you know. 2 Q. So what I want to understand in more detail is then how 3 the information, who collated it and how it was passed 4 it on to you. So can you help me with that? So 5 starting with information that came to you from the BP 6 route. We'll start there. 7 A. From the BP route it would come from the Algiers office 8 where there is a security analysis in the office and it 9 would send out weekly security updates. 10 Q. And these were written updates? 11 A. Yes, written updates. 12 Q. How would you receive them? 13 A. We would receive them via email. 14 Q. And what was your understanding of how those updates 15 were collated? 16 A. Collated from the information, information from the 17 embassies or from websites, local websites, Algerian 18 websites et cetera. 19 Q. That's coming from BP. Did AFMC, your parent company as 20 such, did they provide you with any information of 21 a similar type? 22 A. No, not directly, no. If they had anything urgent then 23 they would pass it on directly to Hassi Messaoud, to the 24 HQ. What we called the HQ, the Algerian liaison 25 manager.</p> <p style="text-align: center;">Page 71</p>
<p>1 A. That's correct. 2 Q. Is that a fair summary? 3 A. Yes. 4 Q. And then of course it is only those above you who can 5 decide yes or no, you are allowed to do that? 6 A. Yes, we don't have any executive decision making powers. 7 Q. When you are giving that advice or coming to your view 8 in order to give advice what sources of information did 9 you have to be able to form your view about what's 10 needed? 11 A. There were two major attacks in Algiers at the time. 12 There was two vehicle borne IEDs attacks against the 13 parliament buildings in Algiers and the United Nations 14 and immediately we'd realise that the modus operandi of 15 the, at the time it was the GSPC had changed radically. 16 GSPC then affiliated themselves with Al Qaeda and became 17 Al Qaeda in the Islamic Maghreb and they specifically 18 stated that they would now target western interests 19 within Algeria. 20 Q. And that kind of information, how did you come by that 21 information, were you sitting reading newspapers and 22 websites or were others doing that? 23 A. Others were doing it as well. BP and Statoil had 24 offices in Algiers. They were very close to the 25 embassies. So they had regular meetings with the</p> <p style="text-align: center;">Page 70</p>	<p>1 Q. And he would pass it on to you? 2 A. Yes. 3 Q. But the weekly updates were a BP document which came to 4 you? 5 A. Yes, that's correct. 6 Q. From BP? 7 A. Yes. 8 Q. Did you receive anything similar from Statoil? 9 A. No, nothing. 10 Q. And did you receive anything similar from Sonatrach? 11 A. No, Sonatrach would send out updates, you know, 12 (inaudible) Tuareg, saying we had to reinforce security 13 measures without any real reasoning behind it. But 14 nothing specific, it was quite a restraint, let's say. 15 The intelligence from Sonatrach is very, very hard to 16 get hold of. 17 Q. So it sounds from what you are describing that what you 18 were getting from BP you perceived as more useful? 19 A. Yes, it's basically most of the intelligence we were 20 receiving was from BP. 21 Q. Did you receive any information directly from the 22 Algerian army? 23 A. Yes, yes. 24 Q. Tell us about that. How would that happen? 25 A. For instance, whenever there was a serious security</p> <p style="text-align: center;">Page 72</p>

18 (Pages 69 to 72)

1 **incident within the country or externally Libya and**
 2 **Mali, Tunisia, we would immediately, you know, ask for**
 3 **an audience with the local military commanders on all**
 4 **locations. I did the same in In Amenas, so did Paul.**
 5 **So we would arrange a meeting with the Brigade**
 6 **commander, the Gendarme commander at the time.**
 7 Q. Because we know we have the Gendarmes and we have the
 8 military and I know sometimes the terms get
 9 interchangeable.
 10 **A. They do.**
 11 Q. So when I say army or military I mean the army as such?
 12 **A. At in Amenas we did have military on site at one time.**
 13 Q. I will start with the military. Did you have direct
 14 conversations with the military, the army about this?
 15 **A. Yes, in 2006 we did, yes.**
 16 Q. At other times after 2006?
 17 **A. Only when they visited because in 2008 the Gendarmes**
 18 **took over protection of the site. So from our point of**
 19 **contact would have been the Brigade commander on site at**
 20 **the Tigantourine.**
 21 Q. So now going to the Gendarmes and talking about them.
 22 What information did they pass on to you? What type of
 23 information? At this stage I don't want to know what
 24 the information was but just the type of information and
 25 how it came to you.

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1 **A. Again, if they did -- we would seek confirmation about**
 2 **a security event we had heard of, a rumour et cetera.**
 3 **Most of the time they would simply deny any issues in**
 4 **the country. They would always say it was a peaceful**
 5 **country. There was no issues. Expats are safe. That**
 6 **type of thing. And if they did decide to restrict**
 7 **movements they would very, very rarely give any reasons**
 8 **for that. They would simply say: from now on, you know,**
 9 **we have to restrict expat movements et cetera et cetera.**
 10 **Without giving any reasons for it.**
 11 Q. So from what you are saying it sounds like more like
 12 they are telling you what they are going to do and
 13 what's going to happen?
 14 **A. Yes.**
 15 Q. Rather than them actually sharing information or
 16 intelligence with you?
 17 **A. Yes, they just give us formal instructions basically.**
 18 Q. Was that how the relationship worked even with the
 19 Gendarme commander at the In Amenas base?
 20 **A. Yes, we had very good relations with the Gendarme**
 21 **commander but he was, you know, restricted to what he**
 22 **could tell us basically.**
 23 Q. We have heard the name Captain Hocine, is this the man
 24 we are talking about?
 25 **A. That's correct.**

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1 Q. So he was the senior Gendarme on the site?
 2 **A. Yes.**
 3 Q. So from what the Gendarme captain was able to pass on to
 4 you what security requirements did you understand there
 5 were from the perspective of the Gendarmes?
 6 **A. Security requirements?**
 7 Q. Yes.
 8 **A. He would basically ask us to increase escort numbers for**
 9 **instance. To add additional vehicles to the protection**
 10 **zone that we had opened. Restrict expat movements to**
 11 **business critical only, this type of thing.**
 12 THE CORONER: Sorry, when you say that he would ask you to
 13 increase escort numbers -- who --
 14 **A. Basically because we logistically --**
 15 THE CORONER: What numbers would you be increasing?
 16 **A. We logistically supported the Gendarmes so we supplied**
 17 **the vehicles and drivers for their military, for their**
 18 **Gendarmes, for the troops.**
 19 THE CORONER: So he would say what, "I need some more
 20 drivers and more vehicles because there will be more
 21 Gendarmes going on the escorts"?
 22 **A. Yes.**
 23 THE CORONER: Thank you.
 24 MS DOLAN: So that is the escorts. Did the Gendarme captain
 25 suggest to you there were any other risks that needed to

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1 be managed at the site?
 2 **A. No, no.**
 3 Q. It might appear that because there is such a focus on
 4 escorts that the main risk that is being perceived is
 5 the risk of kidnapping?
 6 **A. Yes, I can assure you that the captain never at any time**
 7 **spoke to us about a threat of terrorism but the threat**
 8 **of terrorism is always there. Weekly, weekly we gave**
 9 **security updates on site and typically in a week you**
 10 **would have two or three occasions where there were**
 11 **serious security incidents, terrorist incidents within**
 12 **the country. And so the captain wouldn't talk about**
 13 **terrorism, he wouldn't imply there would be kidnapping**
 14 **or ransom either. It would just be basically we need to**
 15 **increase vigilance, we need to increase troop numbers**
 16 **et cetera.**
 17 THE CORONER: Sorry, you said weekly we gave security
 18 updates on the site.
 19 **A. Yes.**
 20 THE CORONER: To whom did you give them?
 21 **A. We gave them to the Field IMT and all senior managers.**
 22 THE CORONER: Sorry. The Field --
 23 **A. The Field IMT. And all senior managers on site, yes.**
 24 **We would have two meetings on the Saturday. One would**
 25 **be at 1300 hours where we would meet with the FIMT and**

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1 **the senior managers, the senior In Amenas operations**
2 **managers and at 4 o'clock we would then go over to the**
3 **In Amenas compression site and we would give those the**
4 **same security briefing. So the JJC staff and the**
5 **In Amenas Compression shareholder staff.**
6 MS DOLAN: Just to be clear, the first meeting is with
7 the --
8 **A. FIMT.**
9 Q. The FIMT which are the people who are working out in the
10 field --
11 **A. Yes.**
12 Q. -- off the main site?
13 **A. The construction staff are there as well, the**
14 **construction managers are there as well.**
15 Q. And it includes the senior managers and we are talking
16 at the relevant time of Mark Cobb, Tore Bech and
17 Lotfi Benadouda?
18 **A. Yes.**
19 Q. And then you gave the same briefing at the JGC?
20 **A. Yes.**
21 Q. The Japanese Gas Corporation?
22 **A. Yes.**
23 Q. And as we understand it that was a separate project
24 running --
25 **A. Yes.**

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1 Q. -- which had to some extent its separate managerial
2 structure?
3 **A. It did. It had its separate shareholder compression**
4 **management team.**
5 Q. And the Compression Project weren't part of the JV but
6 they were working on the JV site?
7 **A. Yes, they were working on the JV.**
8 Q. And in the liaison function it was the entire site that
9 you are covering?
10 **A. Yes.**
11 Q. Coming back then to the risks of terrorism that is
12 perceived. What at the time then did your liaison team
13 consider were the main threats to the project and
14 workers at the project?
15 **A. The main threats to the project? The main threat, the**
16 **major risk was the airport escort run.**
17 Q. The kidnapping risk of that?
18 **A. Kidnapping, ambush. That was the main risk for us.**
19 Q. After that what other risks were you considering that
20 you had to take into account when you were planning
21 security?
22 **A. The airport wasn't very secure. There was always an**
23 **attack, there was always a possibility of an attack at**
24 **In Amenas airport. Security was very lax and so there**
25 **was always an opportunity there. Anywhere in In Amenas**

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1 **really the protection wasn't that good. The security**
2 **wasn't that good within In Amenas town.**
3 Q. You mean the town?
4 **A. Yes.**
5 Q. But at the plant? What other risks did you have in mind
6 that you had to take security precautions for?
7 **A. We had the terrorist risk itself. We had the risk of**
8 **a terrorist attack on the base, on the camp itself.**
9 Q. We have seen a document which I think was produced in
10 2009. If you could pick up the green bundle just on the
11 side beside you and turn to tab 9. Bundle 1. Do you
12 recognise that document at all? You may not have seen
13 this for some time.
14 **A. No, no, never seen it in English.**
15 Q. So what language do you see it in?
16 **A. French.**
17 Q. In French.
18 **A. This is for the guards, yes.**
19 Q. Yes. It has been suggested and you can confirm then
20 that this was the instructions -- where it says
21 "security officers" it means for the civilian guards?
22 **A. These are the guards, the civilian guards who would**
23 **carry out access control procedures on site.**
24 Q. And if you turn to the second page of that, page 48 of
25 the bundle, the second page of the document, it has

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1 there under 1.1, the threats and lists the main threats
2 against the project?
3 **A. Yes.**
4 Q. And lists, we can see there are seven bullet points
5 which are the methods of attack which could be used
6 against the site. And the first three perhaps, will you
7 agree, could be grouped together?
8 **A. Yes.**
9 Q. As they are incursions by terrorists, armed terrorists
10 at the site, whether in camouflage or obtaining access
11 on false pretenses or just doing a forced entry and they
12 are the first three risks which were perceived at this
13 time and then I think the last four bullet points which
14 are more distant threats in the sense of a placing
15 a bomb, or a car or truck bomb or a sniper attack or
16 a parcel bomb?
17 **A. Mmm.**
18 Q. That appears to be the threats that were perceived in
19 2009?
20 **A. Yes.**
21 Q. Did they remain the key threats that were perceived in
22 2013?
23 **A. Yes, yes.**
24 Q. I want to then move on to ask you about the physical
25 security about the plant, but as we go through keeping

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<p>1 in mind what aspects of the physical security you 2 considered were going to address those first three 3 threats, the threats of armed attack by terrorists if 4 I can put them in that way. Because we have heard 5 something about what was present from other witnesses 6 already. 7 But first of all, in terms of physical security we 8 understand there were fences, wire fences round the 9 plant? 10 A. Yes, there were. Double perimeter fences in all 11 locations basically. 12 Q. What was the purpose of those fences? 13 A. The purpose was to stop an incursion. An incursion or 14 criminal act. To stop or to slow down a penetration 15 from a hostile group. 16 Q. We have heard, I don't know if you were here this 17 morning when Darren Matthews was giving some evidence, 18 that the fences, certainly one of the rows of fences 19 appears could be easily got under just to get your 20 football back? 21 A. Yes, I understood that. I came a bit late but that was 22 the internal fence? 23 Q. The internal fence he was talking at. 24 A. It is not there for a security reason, the internal 25 fence between the BdV and the companies camp. That is Page 81</p>	<p>1 in front of you you will find a document labelled 2 "Security management plan"? 3 A. Yes. 4 Q. Again, this has December 2012 on it. I will wait until 5 you get to it. 6 A. Yes. 7 Q. Do you recognise that document? 8 A. Yes, I certainly do. 9 Q. Tell us what this document is? 10 A. This document, it is basically, it is a way that the 11 liaison team ensure that the shareholders operational 12 requirements are met and this is also -- it's also 13 allows us to give senior management a security update. 14 Q. So although it has the logos of the three JV companies 15 at the top who was the author of this document? 16 A. This would have been the Algerian liaison manager, 17 John Wigg and Gary Butt. 18 Q. So this isn't your company, AFMC, producing this? 19 A. We're the contractors AFMC but we work for the JV as in 20 BP/Statoil/Sonatrach. 21 Q. So you are producing this for the benefit of the JV? 22 A. Yes. 23 Q. To tell them what the security management plan is? 24 A. Yes. 25 Q. To meet their requirements or to meet your advice? Page 83</p>
<p>1 just a fence that should have been removed really when 2 we integrated the whole camp but it was always left in 3 situ. It didn't have a security -- 4 Q. You are saying because this is inside round the, I think 5 it was around the astroturf football pitch it wasn't an 6 outer security fence as such? 7 A. No it is not. But in saying that we did ask for the 8 perimeter fences to be upgraded? 9 Q. Why? 10 A. Because they weren't attached to the ground at the 11 bottom basically. 12 Q. What were the consequences of them not being attached to 13 the ground? 14 A. It is very easy to get underneath. 15 Q. But we have also heard there were some concrete 16 blocks -- 17 THE CORONER: Who did you ask then for those to be upgraded? 18 A. That would go through my line manager, the Algerian 19 liaison manager and we asked basically to attach the 20 ground into concrete lintels if you like at the foot of 21 the fence and to reinforce the fence itself because it 22 wasn't a very solid structure so we needed the internal 23 fence reinforced to resist any ramming vehicles 24 et cetera. 25 MS DOLAN: And I think if you look at tab 11 of that bundle Page 82</p>	<p>1 A. Our advice as well. To meet their requirements and our 2 advice for security upgrades. 3 Q. I think just for example in respect of the perimeter 4 fences if you turn to page 100, it goes into landscape, 5 this is aspects of the physical security measures around 6 the BdV and the companies camp we found on the previous 7 page? 8 A. Yes. 9 Q. And there, there is some updates about what has been 10 suggested for the perimeter fences? 11 A. Yes. 12 Q. And if you look at that top row in the right-hand column 13 is this what you are talking about? We see 14 in November 2007 an entry saying "The existing compound 15 is double fenced. There is a requirement to anchor the 16 base in concrete sill and add a vertical support." 17 A. Yes. 18 Q. That's what you are talking about re strengthening? 19 A. Yes. 20 Q. And we see there are various dates showing that that 21 hasn't progressed? 22 A. No, it didn't progress. 23 Q. And then the final date which is highlighted in red is 24 by December 2012 there is still no change and that 25 hadn't progressed? Page 84</p>

<p>1 A. Yes. 2 THE CORONER: So that didn't happen? 3 A. No. 4 MS DOLAN: So is that an example of you giving advice to the 5 JV companies? 6 A. Yes, that's liaison department giving advice to the JV 7 shareholders, yes. 8 Q. And the advice given in November 2007 hasn't been acted 9 upon -- 10 A. No. 11 Q. -- until -- by December 2012? 12 A. No. 13 Q. Leaving fences there and moving on to concrete blocks. 14 We understand there were some concrete blocks used in 15 the compound? 16 A. Yes, there were. This was after the attacks in Algiers 17 in 2006, the VBIED attacks in Algiers, and basically we 18 realised there was now a risk from suicide bombers. So 19 the liaison department advised shareholders to install 20 these three tonne, there were three tonne t bar concrete 21 blocks around the perimeter of all the locations at 22 In Amenas and at ISG as well. 23 Q. Sorry? 24 A. Sorry, in the sister company, the sister project. 25 Q. In Salah Gas. And this is advice that was taken?</p> <p style="text-align: center;">Page 85</p>	<p>1 Q. So what are they monitoring? 2 A. They're monitoring the zone. The zone inside the 3 perimeter fences and immediately to either side. 4 Q. In a sense they're monitoring the -- 5 A. The fence line. 6 Q. -- the fence line? 7 A. Yes. 8 Q. And those images, what is happening with them? Who is 9 observing the images? 10 A. Those images are being fed live directly into the 11 guardhouse to be monitored. 12 Q. And who would be doing that monitoring? 13 A. That would be the Sonatrach, the SSI, the Sonatrach 14 guard. 15 Q. The civilian team? 16 A. Yes. 17 THE CORONER: So that is contemplating that someone has 18 actually managed to get up to the perimeter fencing and 19 so on the basis that somebody might do that this is 20 a way of hoping that you'd pick them up and see them. 21 A. Yes. 22 MS DOLAN: And if somebody was seen on the perimeter fencing 23 in the CCTV what would the guard do then? 24 A. Would alert the military immediately basically. 25 Q. By military you mean the Gendarmes?</p> <p style="text-align: center;">Page 87</p>
<p>1 A. Yes, it was. 2 Q. And we have seen some pictures already of the concrete 3 blocks in place. Were you satisfied that your advice 4 was taken in full and they were placed where the 5 security team were advising? 6 A. Yes, yes. 7 Q. CCTV. Again, was there CCTV at the plant? 8 A. Yes, there was, full perimeter CCTV. 9 Q. When you say full perimeter, which perimeter are we 10 talking about? 11 A. The perimeter of the CPF and the IBO and the perimeter 12 of the BdV and companies camp. 13 Q. So the entire circumference? 14 A. Yes, the entire circumference of the two locations was 15 covered by CCTV. 16 Q. When you say BdV, because different people are using 17 different kind of terminology, we understand there is in 18 a sense the integrated camp which has one area called 19 the BdV, a bit called the companies camp -- 20 A. Yes. 21 Q. -- and then there is an extension? 22 A. And the drilling camp, yes. It is the integrated camp. 23 Q. So around the entirety of the integrated camp. So there 24 were CCTV cameras, pointing inwards or outwards? 25 A. Along, along.</p> <p style="text-align: center;">Page 86</p>	<p>1 A. Sorry, the Gendarmes, yes, confusing. 2 Q. We understand there were motion detectors, were there? 3 A. Yes, there were motion detectors. 4 Q. Can you tell us about those please? 5 A. The motion detector, it was a system that was installed 6 to locate or detect any movements within the specific 7 camera that was detecting movement. 8 Q. So they are linked to the camera? 9 A. They are linked to the camera and the system was called 10 Pathfinder when we were in charge of it. It was 11 a system called Pathfinder and basically it was a motion 12 detector that set off an alarm if any movement was 13 detected within the eye of the camera. You could set 14 the parameters to allow for a full grown man or a dog, 15 dog sized animal, that sort of thing. 16 Q. So do we take it that would then allow whoever was 17 monitoring it to look at that and alert them to look at 18 that particular camera? 19 A. It would. If Pathfinder detected any movement within 20 the perimeter fence it would immediately, the screen 21 would immediately go, the camera would go directly to 22 the monitor basically. So anything he had been 23 observing previously would be superseded by the alert, 24 by the area where there has been an a penetration. 25 Q. How often did it happen that there was an alert picked</p> <p style="text-align: center;">Page 88</p>

<p>1 up by the CCTV cameras?</p> <p>2 A. During the construction phase quite a lot because there</p> <p>3 were a lot of people walking around and they shouldn't</p> <p>4 be inside there and they were.</p> <p>5 Q. Were those things brought to your attention by the</p> <p>6 guards?</p> <p>7 A. When we were in charge, yes, of course. When we were in</p> <p>8 charge. Later on, obviously no.</p> <p>9 Q. What lighting was there around the --</p> <p>10 A. Full perimeter floodlighting all the way round.</p> <p>11 Q. And again, the purpose of that was what?</p> <p>12 A. The purpose of that to illuminate the perimeter fencing</p> <p>13 and the exterior, up to probably 50 metres at the</p> <p>14 exterior.</p> <p>15 Q. So again, that would allow the CCTV to be functional?</p> <p>16 A. Yes.</p> <p>17 Q. We also understand there were some towers on the site.</p> <p>18 A. Guard towers?</p> <p>19 Q. Guard towers?</p> <p>20 A. We call them guard towers but they were basically for</p> <p>21 the Gendarmes and they were located external, outside of</p> <p>22 the perimeter fence, all the way round the perimeter,</p> <p>23 the circumference outside.</p> <p>24 Q. We have a picture of the towers, of the location.</p> <p>25 I think we had suggested to us where the towers are and</p> <p style="text-align: center;">Page 89</p>	<p>1 A. They were installed from the very start of the</p> <p>2 construction. Once the construction began we would have</p> <p>3 guard towers. At the time it was military and the</p> <p>4 military did use these towers.</p> <p>5 Q. Can I pause a moment. You told us you started in 2004?</p> <p>6 A. Mmm.</p> <p>7 Q. Were the towers already in place then or was this --</p> <p>8 A. No, this camp wasn't in place. It was a smaller camp.</p> <p>9 Q. When was this camp built or roughly?</p> <p>10 A. It began in 2004/2005. With first gas I believe in 2006</p> <p>11 I believe, a complete commissioning then.</p> <p>12 Q. So around this living area or integrated camp as we call</p> <p>13 it, these towers were put in place and again, you say</p> <p>14 during construction, when were the towers put in place?</p> <p>15 A. Yes, even when we have a temporary camp with expats</p> <p>16 occupation we have military guard towers around, around</p> <p>17 the site.</p> <p>18 Q. And when they were first put in place were they</p> <p>19 occupied?</p> <p>20 A. Yes, by the military, yes, that's correct.</p> <p>21 Q. And the military you mean Gendarmes?</p> <p>22 A. No, I mean military, army, the Gendarmes replaced the</p> <p>23 military.</p> <p>24 Q. So at that time the army is guarding the site?</p> <p>25 A. Mmm.</p> <p style="text-align: center;">Page 91</p>
<p>1 I wonder if you could look at the picture?</p> <p>2 A. Yes, yes.</p> <p>3 Q. Sorry, you are going to have to look at the screen,</p> <p>4 Mr Fitzpatrick. It seems there is just a screen copy?</p> <p>5 THE CORONER: Can you see it on the screen?</p> <p>6 A. Yes, thank you.</p> <p>7 THE CORONER: Just look carefully though because there are</p> <p>8 a number of them. Is that as you recall it where they</p> <p>9 were?</p> <p>10 A. Yes, that's correct.</p> <p>11 MS DOLAN: So they are outside the fence line?</p> <p>12 A. They're outside, yes.</p> <p>13 Q. So to access the tower you have to walk outside of the</p> <p>14 fence?</p> <p>15 A. No, these guard towers are specifically for the</p> <p>16 Gendarmes.</p> <p>17 Q. So could anybody on the inside of the fence access them?</p> <p>18 A. No, you would have to be outside to access them.</p> <p>19 Q. And under what circumstances did you anticipate the</p> <p>20 Gendarmes might use those?</p> <p>21 A. Well, we installed them for the Gendarmes to use</p> <p>22 24 hours a day.</p> <p>23 Q. You say "we installed" them let us unpick that.</p> <p>24 A. The JV installed them.</p> <p>25 Q. Do you recall when they were installed? Was it when --</p> <p style="text-align: center;">Page 90</p>	<p>1 Q. While construction is underway and the towers are in</p> <p>2 place and the army used them?</p> <p>3 A. Yes.</p> <p>4 Q. At that time?</p> <p>5 A. Yes.</p> <p>6 THE CORONER: Were these day and night or don't you</p> <p>7 remember?</p> <p>8 A. Day and night. They wouldn't use every tower obviously.</p> <p>9 The camp wasn't this big when they were on location but</p> <p>10 yes, they would use them day and night.</p> <p>11 MS DOLAN: Did you have an understanding of why they thought</p> <p>12 it was necessary to use them?</p> <p>13 A. Because of the risk in the area of banditry, terrorism,</p> <p>14 et cetera.</p> <p>15 Q. And this was 2000 and what?</p> <p>16 A. 2004, yes.</p> <p>17 Q. At what time -- did there come a time when they stopped</p> <p>18 using them?</p> <p>19 A. The Gendarmes.</p> <p>20 Q. When the transfer to the Gendarmes happened and you say</p> <p>21 that was in 2008?</p> <p>22 A. Yes, the Gendarmes decided to, they wouldn't use the</p> <p>23 towers unless it was a serious emergency and that they</p> <p>24 would prefer to have a mobile patrol.</p> <p>25 Q. So when you were told that they had decided not to use</p> <p style="text-align: center;">Page 92</p>

1 the towers and do something else instead what was your
 2 view of that at the time?
 3 **A. Well, we were against it totally and we were until the**
 4 **very end. We built these for the Gendarmes.**
 5 Q. Did you tell anybody that you were against it?
 6 **A. Yes, yes, all the liaison team were. My line manager in**
 7 **Hassi was against it as well.**
 8 Q. Did you make representations to anybody about your
 9 concerns?
 10 **A. Yes, to the military directly.**
 11 Q. Again to the military?
 12 **A. The military commander on site, the Gendarme commander,**
 13 **the captain at the time.**
 14 Q. What was his response?
 15 **A. He said it was his choice. He was in command basically.**
 16 **He preferred to use a mobile patrol of vehicles around**
 17 **the site. 24 hours a day instead of manning the towers.**
 18 THE CORONER: You said you were against it meaning I think
 19 the removal of people in those. You say until the very
 20 end. Do you mean up to and including the time of the
 21 incident we are concerned with?
 22 **A. Yes.**
 23 THE CORONER: So had anybody asked you up until then as to
 24 whether in your view the towers should have been manned
 25 you would have said yes?
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1 **A. Yes.**
 2 THE CORONER: And were you passing on that view?
 3 **A. Yes.**
 4 THE CORONER: Regularly?
 5 **A. Yes, we were.**
 6 THE CORONER: You yourself?
 7 **A. Yes, and my back-to-back Paul.**
 8 THE CORONER: Who did -- I just want to know, I have got to
 9 the Gendarme directly but who else as it were, were you
 10 telling?
 11 **A. Well, my line manager obviously.**
 12 THE CORONER: Who's that.
 13 **A. John Wigg and Gary Butt. I would have mentioned it to**
 14 **senior project management but I can't remember if**
 15 **I mentioned to Mark or anyone but I would have brought**
 16 **it up basically.**
 17 THE CORONER: Can I just ask this: you were told that wasn't
 18 going to happen and he preferred to do vehicle patrols.
 19 In the light of that and the fact that you thought that
 20 was necessary did you think about whether there were any
 21 other measures that you should take or that you could
 22 take yourself given that they weren't going to do what
 23 you thought needed to be done? Do you follow the
 24 question? What is the answer to that?
 25 **A. Well, we tested the efficacy, the effectiveness of the**
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1 **mobile patrols to see how it would work and the type of**
 2 **reaction and they believed that the five vehicles that**
 3 **we gave them for the night patrols was adequate to**
 4 **intervene at any -- on any position on the site within**
 5 **ten minutes basically, or less than ten minutes because**
 6 **they're a mobile patrol. So we tested this with the**
 7 **Gendarmes and we did push them because we would**
 8 **obviously have preferred Gendarmes in the towers and in**
 9 **mobile patrol to secure the zone.**
 10 THE CORONER: Because on one view if you have somebody in
 11 the towers seeing somebody there might not be the ten
 12 minute delay to notice something.
 13 **A. It's instantaneous, yes.**
 14 THE CORONER: What I am curious about is, can you help me
 15 with this, given that they said they weren't going to do
 16 that and they were going to rely on the patrol that gets
 17 somewhere in ten minutes, all I just want to understand
 18 is were there any measures that you then considered that
 19 were, as it were, deliverable by you so that it didn't
 20 depend on them to make up for what they weren't going to
 21 do which you thought was necessary? Do you see what
 22 I am interested in?
 23 **A. I do, but unfortunately we had full perimeter CCTV**
 24 **cameras, some of these cameras we orientated outwards,**
 25 **when we realised we spoke to the vendor, Synectics, and**
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1 **we could orientate some of these outwards. So that**
 2 **added some depth to our detection, if you like. And we**
 3 **also began mobile patrols within the camp with the local**
 4 **guards. So they began to carry out two man mobile**
 5 **patrols within the interior but the exterior was totally**
 6 **under the jurisdiction and the control of the Algerian**
 7 **forces.**
 8 THE CORONER: When were some of the cameras faced outwards
 9 then?
 10 **A. We started to turn them outwards about 2008/2009 after**
 11 **the vendor's visit in 2009.**
 12 THE CORONER: And then what about the mobile patrols within
 13 the camp by the local guards?
 14 **A. That was permanent. That was a permanent day and night**
 15 **two men mobile patrols.**
 16 THE CORONER: So those had been there for all time?
 17 **A. Yes.**
 18 THE CORONER: So was there actually anything, it looks as if
 19 though those measures had been going for some time and
 20 one of them for all time, the other since 2008. What
 21 I am just wondering is more particularly, say 2012, when
 22 in your view there need to be, the towers really should
 23 be occupied, did you think there was anything that as it
 24 were, was within your capacity to deliver, to make up
 25 for the fact that they weren't doing what you thought
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<p>1 was necessary?</p> <p>2 A. It's very difficult, very difficult. The Algerian</p> <p>3 government and Sonatrach basically are responsible for</p> <p>4 the external security of the site. Not so much</p> <p>5 Sonatrach but the Algerian government and it is very,</p> <p>6 very difficult to change their thinking around these</p> <p>7 things.</p> <p>8 THE CORONER: I appreciate that. What I am just interested</p> <p>9 in is more whether given they weren't going to do</p> <p>10 something and you couldn't change their minds or nobody</p> <p>11 could, whether any thought was given as to whether there</p> <p>12 was anything you could do yourself to make up for it.</p> <p>13 Was there ever a session when you all sat down and</p> <p>14 thought like that or not really?</p> <p>15 A. Yes, we were brainstorming all the time and we're in</p> <p>16 daily contact with each other and with the military,</p> <p>17 daily contact with the military with issues such as</p> <p>18 these but --</p> <p>19 THE CORONER: But there was nothing you could really think</p> <p>20 of.</p> <p>21 A. Honestly we couldn't because it's external. These</p> <p>22 towers are all external basically.</p> <p>23 THE CORONER: All right. Thank you.</p> <p>24 MS DOLAN: I will come back to the patrols later on, just to</p> <p>25 keep on with looking at the physical security. I want</p> <p style="text-align: center;">Page 97</p>	<p>1 north, isn't it?</p> <p>2 A. Yes, yes.</p> <p>3 Q. There are two gates to the north. Which ones are those</p> <p>4 you are referring to?</p> <p>5 A. Where you see the baggage search guardhouse, so that's</p> <p>6 the interest to entrance to the BdV basically. So the</p> <p>7 outer gate would be a sliding gate, a vehicle sliding</p> <p>8 gate and the internal gate is exactly the same,</p> <p>9 a sliding gate as well.</p> <p>10 Q. Is it a sliding gate?</p> <p>11 A. Yes.</p> <p>12 Q. Or is it one that --</p> <p>13 A. No, it is not. Both of those are sliding gates.</p> <p>14 THE CORONER: Just see if you can show that picture.</p> <p>15 MS DOLAN: Can I show you a picture and you tell us what we</p> <p>16 are looking at in the picture then. Do you recognise</p> <p>17 where this picture is taken from?</p> <p>18 A. Yes, I do.</p> <p>19 Q. Where's that?</p> <p>20 A. That's the inner gate of the BdV.</p> <p>21 Q. If you look behind the bus it appears to us who haven't</p> <p>22 been there that that's --</p> <p>23 A. That's a sliding gate. That's been taken out of its</p> <p>24 sliding -- out of its --</p> <p>25 Q. So it is not one that is on a hinge?</p> <p style="text-align: center;">Page 99</p>
<p>1 to ask about the entry gates and we will start with the</p> <p>2 entry gates to the integrated camp. Tell us about the</p> <p>3 gates and what there was and what they were there for.</p> <p>4 So --</p> <p>5 A. The entrance into the integrated camp, there was two</p> <p>6 entrances from the north, three from the south. Vehicle</p> <p>7 entrances and pedestrian gates to the north. The</p> <p>8 vehicle entrances on both the entrance to the BdV and</p> <p>9 the companies camp were basically sliding gates, sliding</p> <p>10 vehicle access gates.</p> <p>11 Q. Can I pause you there. When you say there are two</p> <p>12 entrances to the north do you mean two vehicle entrances</p> <p>13 or a pedestrian --</p> <p>14 A. Yes, two pedestrian entrances and two vehicle entrances.</p> <p>15 Q. I think we have another chart which looks like that and</p> <p>16 has "Living Area" written on the top of it. Do you have</p> <p>17 that on the desk there?</p> <p>18 A. Yes, I have it.</p> <p>19 THE CORONER: You will see for example if you look at it</p> <p>20 that some of the guard towers compared with what you</p> <p>21 looked at there aren't on here. All right so we really</p> <p>22 want your help. Don't assume this is correct, all</p> <p>23 right, we want your help as to whether it is correct.</p> <p>24 MS DOLAN: So let's start. You said there are two gates to</p> <p>25 the north. I think this picture is orientated to the</p> <p style="text-align: center;">Page 98</p>	<p>1 A. It's not on a hinge. That has been broken. It has been</p> <p>2 smashed.</p> <p>3 Q. Thank you. So we have two sliding gates and they are</p> <p>4 both in fence lines?</p> <p>5 A. Yes.</p> <p>6 Q. Starting with the outer one what position was that</p> <p>7 usually left in?</p> <p>8 A. Closed position. Procedural wise it would have to be in</p> <p>9 the closed position permanently.</p> <p>10 Q. That is the procedural requirement?</p> <p>11 A. Yes.</p> <p>12 Q. In practice what actually happened?</p> <p>13 A. Well sometimes, you know, the guys get a bit lazy and,</p> <p>14 you know, they'll leave it open to allow one or two</p> <p>15 vehicles out at the same time. Something like this but</p> <p>16 normally procedurally it would be closed at all times.</p> <p>17 Q. It should be closed?</p> <p>18 A. Yes.</p> <p>19 THE CORONER: When you say procedurally, that is what the</p> <p>20 rules were?</p> <p>21 A. Yes.</p> <p>22 THE CORONER: And then there is a difference between what</p> <p>23 the rules were and what happened.</p> <p>24 A. We lost management of the guard force in July and I can</p> <p>25 assure you that they do need some motivation, the</p> <p style="text-align: center;">Page 100</p>

25 (Pages 97 to 100)

<p>1 locals, to carry out their duties correctly.</p> <p>2 THE CORONER: Because in a sense --</p> <p>3 A. You need to be very close to them, to be hands on</p> <p>4 basically with your supervision.</p> <p>5 THE CORONER: Do you mean that from July onwards when you</p> <p>6 lost management of them it became more difficult for</p> <p>7 example to make sure that the gate wasn't just left open</p> <p>8 the whole time?</p> <p>9 A. Yes, it was more difficult, yes.</p> <p>10 MS DOLAN: Let us deal with the changeover. What we have</p> <p>11 had described to us by witnesses already is that there</p> <p>12 was a requirement in a sense imposed upon the JV for an</p> <p>13 Algerian company to take over management of the civilian</p> <p>14 security guards.</p> <p>15 A. It was Sonatrach. Sonatrach themselves.</p> <p>16 Q. Sonatrach who determined that should happen?</p> <p>17 A. Yes, yes, I believe. I wasn't obviously privy to the</p> <p>18 JOC meetings, but I believe it was imposed by Sonatrach</p> <p>19 on BP and Statoil.</p> <p>20 Q. And the effect of that was that the liaison team were</p> <p>21 still in place?</p> <p>22 A. Mmm.</p> <p>23 Q. Doing everything they were before except, and what were</p> <p>24 the changes?</p> <p>25 A. Except the management, the day-to-day management of the</p> <p style="text-align: center;">Page 101</p>	<p>1 achieve that.</p> <p>2 A. That's correct, sir, yes.</p> <p>3 MS DOLAN: And the assistant security intern, the ASI think</p> <p>4 they are called, who was that?</p> <p>5 A. They were back-to-back positions. Omar Daoudi,</p> <p>6 Cheikh Belhirane.</p> <p>7 Q. When it was explained to them that a group of guards</p> <p>8 weren't doing what was expected what would be the</p> <p>9 response?</p> <p>10 A. Well, they didn't -- unfortunately they sometimes took</p> <p>11 it as criticism, personal criticism, but in the whole</p> <p>12 they would then report this to their chef de group. So</p> <p>13 in their line, in their hierarchy of control, if you</p> <p>14 like, they would then refer this to their chef de group</p> <p>15 who would then need to speak to their team leader who</p> <p>16 would then speak to the guard concerned. So you have</p> <p>17 four structures there.</p> <p>18 Q. We have seen --</p> <p>19 THE CORONER: It doesn't sound as if that is a matter of</p> <p>20 minutes to pursue that all the way up the chain either?</p> <p>21 A. No, I doubt it.</p> <p>22 THE CORONER: No.</p> <p>23 MS DOLAN: We have seen some documents which might suggest</p> <p>24 that there were a lot of teething problems at first when</p> <p>25 this changeover happened. But that things had started</p> <p style="text-align: center;">Page 103</p>
<p>1 guard force, so everything to do with --</p> <p>2 Q. You weren't in charge of the guards any more?</p> <p>3 A. No, we weren't. So everything to do with internal</p> <p>4 security was taken off us and handed over to Sonatrach.</p> <p>5 Q. Did you carry out any roles and responsibilities in</p> <p>6 respect of the guards after July 2012?</p> <p>7 A. We were there as a mentoring and an advisory role. So</p> <p>8 we would attempt to mentor the people who have taken</p> <p>9 over from us basically. It was quite difficult.</p> <p>10 Q. Would you still watch what was happening with the guards</p> <p>11 and audit it?</p> <p>12 A. Of course, of course, yes. Our OLCs were very close to</p> <p>13 the main gate and they would be there out permanently</p> <p>14 basically. Still trying to work with the guards still</p> <p>15 having some influence over them.</p> <p>16 Q. So they would still be telling the guards what they</p> <p>17 should do?</p> <p>18 A. No in the end they couldn't. They could no longer speak</p> <p>19 to the guards basically. They could only report to</p> <p>20 their senior manager which was the ASI of Sonatrach.</p> <p>21 THE CORONER: Which is a more time consuming process than</p> <p>22 simply going up to someone explaining for example why</p> <p>23 you can't leave the gate open the whole time?</p> <p>24 A. Yes, yes, as an example, yes.</p> <p>25 THE CORONER: This is a different means of having to try and</p> <p style="text-align: center;">Page 102</p>	<p>1 to settle down and things improved. Is that fair?</p> <p>2 A. Yes, that's a fair comment, yes, it did start to</p> <p>3 improve.</p> <p>4 Q. So by the time you were last on site which I think was?</p> <p>5 A. November.</p> <p>6 Q. November 2012?</p> <p>7 A. Yes.</p> <p>8 Q. How was it? Had things started to settle then down</p> <p>9 then?</p> <p>10 A. Yes, relations were good, they were good but --</p> <p>11 Q. In terms of the guards now performing at the level that</p> <p>12 they would have been when you were in charge of them?</p> <p>13 A. No, they were nowhere near the same level when we</p> <p>14 managed the team. That's for sure.</p> <p>15 Q. So what were the shortcomings that were still ongoing</p> <p>16 when you left in November 2012?</p> <p>17 A. The shortcomings -- I would say the guards were very</p> <p>18 lax. They were beginning to get -- they weren't as</p> <p>19 disciplined as --</p> <p>20 Q. How did that actually --</p> <p>21 A. Disciplined?</p> <p>22 Q. Give us an example of how that actually manifested in</p> <p>23 their daily actions?</p> <p>24 A. Well, I would say -- and then we had reports from the</p> <p>25 OLCs that basically the gate closing incidents, the</p> <p style="text-align: center;">Page 104</p>

26 (Pages 101 to 104)

<p>1 internal gate as well and they were quite, you know,</p> <p>2 lackadaisical if you like in their attitude, quite</p> <p>3 unprofessional sometimes.</p> <p>4 THE CORONER: When you say the internal gate do you mean</p> <p>5 that might be left open when it was meant to be shut?</p> <p>6 A. Slightly open. 2 or 3 metres not all the way closed.</p> <p>7 MS DOLAN: So we have heard some evidence from witnesses</p> <p>8 that they perceived that the norm was that this outer</p> <p>9 gate was left open at what I have termed the rush hour,</p> <p>10 first thing in the morning when everybody is taking</p> <p>11 their vehicles from the car park down to the CPF or when</p> <p>12 they were coming back at lunch or coming back in the</p> <p>13 evening that it was quite frequent for the outer gate to</p> <p>14 the car park to be left open. Was that your experience?</p> <p>15 A. Yes, and this is the -- a lot of the problems we had</p> <p>16 that we, it was procedurally again. The gates must be</p> <p>17 closed. The vehicle must be searched at the exterior of</p> <p>18 the base. Once the search had been carried out and the</p> <p>19 occupants have been identified that vehicle would be</p> <p>20 allowed into the base. The gate would then be closed</p> <p>21 again. And we would carry on the same procedure with</p> <p>22 every vehicle. That was the procedure that should have</p> <p>23 been put -- that was in place and should have been</p> <p>24 carried out by the guards.</p> <p>25 THE CORONER: And no doubt when it's done properly like</p> <p style="text-align: center;">Page 105</p>	<p>1 guardhouse. So expats departing would be controlled in</p> <p>2 what we call a booking in and booking out system.</p> <p>3 Q. So if you are opening and shutting the gate for every</p> <p>4 single car that's leaving even in the morning to go to</p> <p>5 work did quite a traffic jam build up?</p> <p>6 A. Of course, yes.</p> <p>7 Q. How satisfied are you that even before July 2012 that</p> <p>8 process was followed?</p> <p>9 A. Well, sometimes it wasn't followed.</p> <p>10 Q. That is the outer gate.</p> <p>11 A. Mmm.</p> <p>12 Q. Can I then ask about the inner gate which is the access,</p> <p>13 as we understand it, to the BdV and other aspects.</p> <p>14 First of all, you describe that as a sliding gate?</p> <p>15 A. It is, yes.</p> <p>16 Q. How is it actually secured when it was closed because of</p> <p>17 course there are gates you can just push up and they</p> <p>18 look shut?</p> <p>19 A. Yes.</p> <p>20 Q. Was there some mechanism to secure it?</p> <p>21 A. I was a chain and a lock. A chain and lock basically.</p> <p>22 Q. And would one expect between each car it was chained and</p> <p>23 locked?</p> <p>24 A. It should be chained and locked. It should have</p> <p>25 remained locked at all times.</p> <p style="text-align: center;">Page 107</p>
<p>1 that, as with all security measures that are done</p> <p>2 properly, it takes time and causes delay --</p> <p>3 A. It takes time.</p> <p>4 THE CORONER: -- but that I am afraid is the price that you</p> <p>5 have to pay for things being done properly for one's own</p> <p>6 safety.</p> <p>7 A. Yes, that's correct.</p> <p>8 MS DOLAN: What was the procedure for a vehicle leaving in</p> <p>9 the morning?</p> <p>10 A. The same. The vehicle would present itself. It would</p> <p>11 then be controlled at the internal barrier, the access</p> <p>12 control barrier or the vehicle control barrier. The</p> <p>13 gate would then be opened, it would be allowed to</p> <p>14 leave and the gate would close.</p> <p>15 Q. You mentioned the two things, the barrier and the gate?</p> <p>16 A. There is a vehicle control barrier which would check the</p> <p>17 vehicle, halt the vehicle and the occupants should then</p> <p>18 be identified.</p> <p>19 Q. But at this point the gate would be closed --</p> <p>20 A. Yes.</p> <p>21 Q. -- and the barrier would be done?</p> <p>22 A. Yes.</p> <p>23 Q. And you identify the occupants who were leaving the car</p> <p>24 park?</p> <p>25 A. Yes, and all the expats' names are then taken at the</p> <p style="text-align: center;">Page 106</p>	<p>1 Q. So if a car approached or a vehicle approached that</p> <p>2 needed to come into the BdV the guard would have to take</p> <p>3 a key or was this a combination?</p> <p>4 A. No, it's a key. It's just a basic security lock.</p> <p>5 Again, that was procedural.</p> <p>6 THE CORONER: It is simply a question of putting a key in</p> <p>7 a lock to open it?</p> <p>8 A. Yes, but that's procedural.</p> <p>9 MS DOLAN: And then unwrap a chain.</p> <p>10 A. Yeah. So basically what you are getting to, no that,</p> <p>11 that didn't happen all the time. After curfew at 19.30</p> <p>12 that would be put in place until the morning, 5.30.</p> <p>13 Q. So once again the traffic starts moving in the rush</p> <p>14 hours the chain wasn't put on regularly?</p> <p>15 A. No, there were no traffic allowed inside. Only</p> <p>16 essential vehicles or emergency vehicles would be</p> <p>17 allowed inside.</p> <p>18 Q. But there was a chain and a lock for the outer gate as</p> <p>19 well as the inner gate?</p> <p>20 A. Yes, there was.</p> <p>21 Q. But the practice had grown up that the chain was</p> <p>22 impractical to put back on after each car in the</p> <p>23 morning. Is that the reality?</p> <p>24 A. It's time consuming, yes.</p> <p>25 Q. We understand there was some chicanes on the entrance?</p> <p style="text-align: center;">Page 108</p>

<p>1 A. Yes.</p> <p>2 Q. I think actually we have some pictures of them after</p> <p>3 events. I think if you look on the desk, if you look at</p> <p>4 the top left-hand corner of your desk there you probably</p> <p>5 find it easier to see it. It is page 5 of that. You</p> <p>6 can see there are two pictures on the right-hand side?</p> <p>7 A. Yes.</p> <p>8 Q. What are we looking at there?</p> <p>9 A. We are looking at the entrance to the chicane for the</p> <p>10 BdV entrance.</p> <p>11 Q. The chicanes are created by what?</p> <p>12 A. You can see there are three sets of steel piping,</p> <p>13 reinforced steel piping that is embedded into the</p> <p>14 ground, into the tarmac. What's missing here is the</p> <p>15 swing arm crash barrier which closes the chicane off in</p> <p>16 case of emergencies. We are missing that to the left.</p> <p>17 If you see the top photograph the third upright along</p> <p>18 has been bent. That should have been attached to</p> <p>19 a swing arm crash barrier.</p> <p>20 Q. So there should have been -- was this a steel metal</p> <p>21 barrier?</p> <p>22 A. It is steel. It is steel piping as well. It is a swing</p> <p>23 arm barrier that connects with the central upright and</p> <p>24 locks into place which makes it very, very, well, very</p> <p>25 difficult to penetrate.</p> <p style="text-align: center;">Page 109</p>	<p>1 sharp or steep, it doesn't really look --</p> <p>2 A. It does slow down vehicles.</p> <p>3 THE CORONER: It slows them down does it?</p> <p>4 A. It slows them down sufficiently that they couldn't ram</p> <p>5 through the gate basically.</p> <p>6 THE CORONER: How does it do that?</p> <p>7 A. Sorry?</p> <p>8 THE CORONER: How would it do that? Suppose you had gone</p> <p>9 through the last one.</p> <p>10 A. Well through the last one you have only got 12 metres to</p> <p>11 the barrier, so.</p> <p>12 THE CORONER: If it's shut.</p> <p>13 A. Yes just to add, it's a shame but these sliding gates</p> <p>14 were actually to be replaced by more solid structures,</p> <p>15 motorized structures.</p> <p>16 MS DOLAN: Why was that?</p> <p>17 A. Well, because we needed these upgrading, they weren't --</p> <p>18 this was what was put in place initially and we need to</p> <p>19 upgrade and it is all part of the physical security</p> <p>20 upgrade so we were putting motorized sliding gates in</p> <p>21 there which had more impact resistance.</p> <p>22 Q. So do we take it from the answer that the reason you</p> <p>23 thought the gates should be upgraded --</p> <p>24 A. It is the same reason we put the concrete T bars around.</p> <p>25 Basically was to stop any ramming vehicles.</p> <p style="text-align: center;">Page 111</p>
<p>1 Q. If we look at the bottom photograph we can see in on the</p> <p>2 right-hand side a red and white pole. That's not what</p> <p>3 we are talking about, is it? That is the raise and</p> <p>4 lower arm, isn't it?</p> <p>5 A. Yes, it is. It is basically just a vehicle control</p> <p>6 barrier made of aluminium.</p> <p>7 THE CORONER: This is another thing, I am just looking at</p> <p>8 the top picture, if you count over from the right, so</p> <p>9 the third pole you can see bent, isn't it, and not --</p> <p>10 A. Yes.</p> <p>11 THE CORONER: So what, there is a facility, did you say in</p> <p>12 an emergency? I just didn't hear.</p> <p>13 A. Yes, it is just out of the picture to your left. There</p> <p>14 is another upright with a steel swinging arm crash</p> <p>15 barrier that we put in place during the night or in case</p> <p>16 of emergencies and that effectively closes off the</p> <p>17 chicane.</p> <p>18 MS DOLAN: So it is another gate?</p> <p>19 A. Yes, it is, it is a swing arm gate.</p> <p>20 THE CORONER: When was that put in? When would that be</p> <p>21 shut?</p> <p>22 A. That would be at shut at 19.30 every evening until 5.30</p> <p>23 in the morning.</p> <p>24 THE CORONER: Just help me with this. The chicane, it</p> <p>25 doesn't look but photographs can be deceptive, terribly</p> <p style="text-align: center;">Page 110</p>	<p>1 THE CORONER: We know it hadn't happened because we can see</p> <p>2 but how long had that been in prospect at least for the</p> <p>3 sturdier and motorized gates would be there? How long</p> <p>4 had that been --</p> <p>5 A. It was quite quick. Within a year, 12 months.</p> <p>6 THE CORONER: That had been talked about say for a year</p> <p>7 before January 2013?</p> <p>8 A. Yes.</p> <p>9 THE CORONER: Had a decision been made?</p> <p>10 A. Yes, it had been made. The gates had been ordered</p> <p>11 I believe. They hadn't arrived on site but they had</p> <p>12 been ordered.</p> <p>13 MS DOLAN: Is this what we find? If you look at page 100 of</p> <p>14 that green bundle behind tab 11 and we are back to the</p> <p>15 security management plan. If you look at that page and</p> <p>16 if you look at the second row from the bottom, entry</p> <p>17 exit points, do you have that? The second row from the</p> <p>18 bottom has it as its title "entry exit points" and if</p> <p>19 we --</p> <p>20 THE CORONER: Do you see where I am pointing? Do you see</p> <p>21 where it says "entry exit points" and I think you are</p> <p>22 going to be taken over across to the right-hand side.</p> <p>23 A. Okay.</p> <p>24 MS DOLAN: And the third column talks about access control</p> <p>25 cabin, a pedestrian access gate and then says "Install</p> <p style="text-align: center;">Page 112</p>

1 motorized vehicle sliding gate on all main entrances."
 2 **A. Yes.**
 3 Q. That is what you are talking about?
 4 **A. Yes, that's correct.**
 5 Q. Then if we look across to the right can we see when that
 6 was suggested can we work that out from here. We see
 7 April 2010 secondary vehicle swing arm barriers to be
 8 installed. I think those are the things you have
 9 already been telling us about. Then March 2011 it says
 10 new access control cabinet main BdV completed?
 11 **A. It is not noted there but it would have been March 2011.**
 12 **I believe it would have been with the access control**
 13 **cabins as well but it might have come a little bit**
 14 **later.**
 15 Q. Is it fair to say we can't tell from that the date of
 16 the advice about the motorized sliding gate was given?
 17 **A. No, but it was recent, it was recent.**
 18 Q. So as recent as could it have first appeared in
 19 this December 2012 document? Can you --
 20 THE CORONER: Do you think it was a bit before that?
 21 **A. It was before.**
 22 MS DOLAN: If you track back, if the last time you were
 23 there was November 2012, does that help you track back
 24 when the motorized gate had been discussed?
 25 **A. Yes, for installation it was discussed a couple of**
 Page 113

1 **months prior to that. So September/October it had been**
 2 **formalised and I had advised senior management on site.**
 3 **At the time they were only going to install one on the**
 4 **perimeter, one sliding gate, and I requested two. So an**
 5 **outer and inner sliding motorized gate to allow one gate**
 6 **to remain closed at all times when the vehicles are**
 7 **moving around.**
 8 THE CORONER: I just want to make sure I have understood.
 9 So this is something we have heard about. Almost like
 10 a capsule or a lock?
 11 **A. Yes.**
 12 THE CORONER: So you come in through one but even if you
 13 have got through that the next one is still shut.
 14 **A. Yes, that's correct.**
 15 THE CORONER: Yes.
 16 **A. And one wouldn't be opened without the other one being**
 17 **closed et cetera.**
 18 THE CORONER: Yes. I just want to understand, the plan --
 19 did I get this right, that originally what had been
 20 agreed was there was only going to be one but you had
 21 pressed for two, is, that what you are saying?
 22 **A. Yes, that's correct.**
 23 THE CORONER: When had you been doing that?
 24 **A. That would have been July, July/August time, when**
 25 **I realised that they were only buying one for each**
 Page 114

1 **entrance. There was only one gate I asked them to**
 2 **double up basically on all entrances.**
 3 THE CORONER: So that you had this sort of lock?
 4 **A. It is a security SAS, where vehicles are kept inside.**
 5 THE CORONER: Had a decision been made about that?
 6 **A. I hadn't received any feedback.**
 7 THE CORONER: You hadn't?
 8 **A. No.**
 9 THE CORONER: But you thought that was necessary.
 10 MS DOLAN: Can I just ask, what was it that made you make
 11 that recommendation in I think you are talking about mid
 12 2012 then or late summer 2012, what was the thing that
 13 made you suddenly say: I'm recommending something we
 14 don't have, that meant you hadn't recommended it in
 15 2010.
 16 **A. The double gate?**
 17 Q. Yes.
 18 **A. There is a potential penetration when an external gate**
 19 **is open. There is potential for a vehicle to penetrate.**
 20 Q. But that had been there since 2004/2008. What changed
 21 to make you --
 22 **A. We always had two sliding gates, two vehicle access**
 23 **gates but it was just basically the fact that motorized**
 24 **is easier to close. So they would have remained closed**
 25 **basically because these gates are quite heavy and they**
 Page 115

1 **require some physical force to open and close them.**
 2 THE CORONER: Sorry, I may have misunderstood. When you are
 3 talking about having two of these gates I think you have
 4 just said that you have always had two. I am
 5 understanding when you are talking about having two
 6 gates if you just look at the bottom picture that's on
 7 the screen you can see there is a sliding gate there all
 8 right. Imagine that is a motorized gate. I am going to
 9 call that one gate. What I had understood you to be
 10 saying was that you had thought that in addition, as it
 11 were, for the sake of argument one motorized gate but
 12 that as it were, not far behind it there would be
 13 another, so that vehicles, if they came through the
 14 first one would be in a sort of lock.
 15 **A. That does apply to the entrance of the companies camp**
 16 **and it also would have applied to the entrance to the**
 17 **Enafor camp as well. They would have those security --**
 18 THE CORONER: You mean if you got your way?
 19 **A. Yes.**
 20 THE CORONER: But they haven't got it here, have they?
 21 **A. Yes, they have.**
 22 THE CORONER: Where is the other one then?
 23 **A. The companies camp has two sliding gates on the entrance**
 24 **and the Enafor camp has two sliding vehicle access gates**
 25 **as well. What we would do is what I was saying is**
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<p>1 replace those two gates with motorized units.</p> <p>2 MS DOLAN: So you are talking about replacing the inner and</p> <p>3 outer gate --</p> <p>4 A. Yes.</p> <p>5 Q. -- but you are not talking about putting two gates at</p> <p>6 the inner gate or two gates at the outer gate?</p> <p>7 A. No, there wouldn't be space for them basically.</p> <p>8 Q. Were you envisaging these were linked in some way so it</p> <p>9 was impossible to have one open when the other was open?</p> <p>10 A. If it's possible to programme it. But no, it would have</p> <p>11 been automatic. It would have been controlled by the</p> <p>12 main guardhouse basically.</p> <p>13 Q. Because we have heard one witness say there was some</p> <p>14 disadvantages to that system because if it is</p> <p>15 a motorized gate where you press a button to make it</p> <p>16 work it might encourage the guards to sit in their</p> <p>17 guardhouse and not come out whereas if they actually</p> <p>18 have to get out and do something it encourages them</p> <p>19 to --</p> <p>20 A. No, they have to physically do something. They have to</p> <p>21 physically search the vehicles and verify identities so</p> <p>22 they have to be outside anyway. There is always, in</p> <p>23 every guardhouse there is always a person inside booking</p> <p>24 in and booking out all the vehicle and expat movements.</p> <p>25 So there's always someone inside those cabins anyway.</p> <p style="text-align: center;">Page 117</p>	<p>1 earlier, it would be used if we had to carry out any</p> <p>2 works at the main entrance so resurfacing or, as we were</p> <p>3 installing the chicanes or upgrading the security and</p> <p>4 they would also be used for heavy vehicles, heavy</p> <p>5 lorries. So when you got heavy loads that were entering</p> <p>6 the camps, for instance, they wouldn't be able to</p> <p>7 manoeuvre the chicane, so we would bring them in this</p> <p>8 entrance, the companies camp entrance.</p> <p>9 THE CORONER: Ms Dolan was asking you about that gate so</p> <p>10 there is that gate there.</p> <p>11 A. Yes.</p> <p>12 MS DOLAN: Do we take it from what you said there was no</p> <p>13 chicane on that gate?</p> <p>14 A. There was a temporary T bar chicane on it. Basically</p> <p>15 two concrete T bars, the anti-crash barriers had been</p> <p>16 put in place as a temporary chicane.</p> <p>17 THE CORONER: Was the gate of the same sort of sturdiness or</p> <p>18 otherwise was this gate --</p> <p>19 A. They were identical, yes and then as you come round the</p> <p>20 western perimeter you will see the entrance, what it</p> <p>21 says "locked gates 2". That is the entrance to the</p> <p>22 Enafor camp or the drilling camps as we refer to them.</p> <p>23 The drilling camp.</p> <p>24 MS DOLAN: And it says "locked". Were these locked gates or</p> <p>25 openable gates?</p> <p style="text-align: center;">Page 119</p>
<p>1 Q. While we are talking about gates to the integrated camp,</p> <p>2 was there access gates anywhere else in that perimeter</p> <p>3 of the integrated camp?</p> <p>4 A. Yes, there were.</p> <p>5 Q. Tell us about those and what the provisions were for</p> <p>6 security on those gates. Is there another one marked in</p> <p>7 the north fence?</p> <p>8 A. No, just the two to the north.</p> <p>9 THE CORONER: Do you mean what we have been looking at here,</p> <p>10 the inner and the outer?</p> <p>11 A. Yes.</p> <p>12 THE CORONER: So the one that had the bus, do you remember,</p> <p>13 parked by it?</p> <p>14 A. Yes, that was the inner gate of the BdV.</p> <p>15 THE CORONER: And the one here which we have been calling</p> <p>16 the outer?</p> <p>17 A. Yes.</p> <p>18 THE CORONER: If you go along this at the top, just go to</p> <p>19 the left, because this doesn't have to be right, can you</p> <p>20 see there is something that says "original entryway" and</p> <p>21 "gates to"?</p> <p>22 A. Yes.</p> <p>23 THE CORONER: In 2012/2013 was that a functioning gate or</p> <p>24 not?</p> <p>25 A. This gate would be used as I heard -- as you were told</p> <p style="text-align: center;">Page 118</p>	<p>1 A. Yes, they were openable gates. They were exactly the</p> <p>2 same system that we have here at the entrance to the</p> <p>3 gate to the companies camp. So two vehicle sliding</p> <p>4 gates.</p> <p>5 Q. Winter 2012, were they in use as sliding gates?</p> <p>6 A. Yes, yes, they were.</p> <p>7 Q. And again, what security personnel were on those gates?</p> <p>8 A. They were part of the SSI team.</p> <p>9 Q. But they were?</p> <p>10 A. So attached to the drilling.</p> <p>11 Q. There would be a guard there?</p> <p>12 A. Oh yes, yes, two guards on days, two guards on nights.</p> <p>13 Q. And would they be opened in the morning?</p> <p>14 A. They would only be opened when people were exiting or</p> <p>15 accessing the base.</p> <p>16 Q. And then coming round to the southern perimeter. There</p> <p>17 is something else marked. Is this an entrance to the</p> <p>18 JGC fly camp where it says "gate" and "guardhouse"?</p> <p>19 A. Yes, that was the entrance to the JGC, the BdV</p> <p>20 basically, the construction site.</p> <p>21 Q. When you say the BdV, this wouldn't get you through into</p> <p>22 where the plaza and the VIP people were though, would</p> <p>23 it?</p> <p>24 A. No, there is a double perimeter fence in between.</p> <p>25 Q. So the JGC fly camp had its own perimeter --</p> <p style="text-align: center;">Page 120</p>

1 **A. Yes.**
 2 Q. -- similar to that we have been discussing?
 3 **A. But it was better actually because it was a better**
 4 **installation, a double perimeter fence was extremely**
 5 **strong. It had -- the fencing was embedded in**
 6 **a concrete sill so very, very well constructed.**
 7 THE CORONER: Sorry, this is the bit that says "gate" and
 8 "guardhouse", is that it down the bottom?
 9 **A. That's correct, if you see it is a rectangular block and**
 10 **that is the BdV -- the Compression BdV.**
 11 THE CORONER: I just want to understand, that is a gate and
 12 a guardhouse, is it on the perimeter or is it actually
 13 inside? I just want to understand because I don't know.
 14 **A. There are two. There's one on the perimeter and one**
 15 **inside as well. So there are two gates. And that small**
 16 **space in the interior is the Compression BdV parking**
 17 **area. You will see two sun shades to the north in blue.**
 18 THE CORONER: Okay and, sorry, you were just saying
 19 something about that -- take the one that's on the
 20 perimeter first all right. You said I think were you
 21 saying that was better than the one at the top?
 22 **A. I was talking about the perimeter fencing.**
 23 THE CORONER: Yes, the perimeter fencing. That was better
 24 was it?
 25 **A. Yes, it was better constructed, more solid construction**

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1 **and we were actually having negotiations with**
 2 **compression, the compression team, to see if they could**
 3 **upgrade our fencing to match that one there that was**
 4 **installed.**
 5 THE CORONER: What about the gate, how was that? Was that
 6 better or the same as the one --
 7 **A. The one that was about to be installed in November**
 8 **I don't think it was installed yet, was a motorized**
 9 **anti-crash vehicle sliding gate. It was a very good**
 10 **specification.**
 11 THE CORONER: Before that was installed did it have
 12 a motorized anti-crash gate?
 13 **A. No it had pivot gates.**
 14 THE CORONER: On a hinge?
 15 **A. On hinges, yes.**
 16 THE CORONER: Thank you. And I think we have some more.
 17 MS DOLAN: There are some more opposite that on the big
 18 fence.
 19 **A. Yes, the same. That is a temporary entrance into the**
 20 **JGC fly camp.**
 21 THE CORONER: What with gates on pivots as well?
 22 **A. Yes, it's on pivots; temporary gates.**
 23 THE CORONER: And temporary because?
 24 **A. Well, because materials arrive, you know, they don't --**
 25 **all the materials, all the equipment doesn't arrive at**

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1 **the same time so basically the gates arrived later so it**
 2 **is just a matter of once they arrive, once they get**
 3 **round to it they would have installed the gates as well.**
 4 **It corresponds with the work schedule.**
 5 MS DOLAN: Is there anything else you can tell us about
 6 gates around the integrated camp before I move on to
 7 asking you about the CPF, anything we should know?
 8 **A. No, I don't think so. I think we have covered just**
 9 **about everything.**
 10 Q. I think then if I can move on to asking you similar
 11 questions about the CPF. Again, you may have a large
 12 map in front of you.
 13 **A. Yes.**
 14 Q. That looks like an annotated photograph. That looks
 15 like that. Again, just to orientate us on this
 16 photograph. In the bottom right-hand corner we see
 17 a tarmac road coming into the picture?
 18 **A. Yes that's the main access into the IBO CPF.**
 19 Q. That is the road from the --
 20 **A. From the BdV, yes.**
 21 Q. What security does one encounter as you drive up that
 22 road?
 23 **A. Security?**
 24 Q. Yes, in terms of gates or fences or?
 25 **A. The gate -- that road is open for 3 kilometres, it is an**

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1 **open road. There are no checkpoints on that road.**
 2 Q. Then you get to the CPF?
 3 **A. Yes.**
 4 Q. And what do we find?
 5 **A. You find a temporary chicane at the entrance, a T bar**
 6 **temporary chicane.**
 7 Q. When you say at the entrance where is that?
 8 **A. The CPF guardhouse and gate.**
 9 Q. So has one come up the road and then turned left to the
 10 guardhouse and gate?
 11 **A. You don't turn left you just drive straight through,**
 12 **straight into it.**
 13 Q. And there there is a chicane?
 14 **A. There is a temporary, we hadn't got round to putting the**
 15 **permanent structure in, it is a temporary T bar chicane,**
 16 **concrete chicane.**
 17 Q. We have seen in the other picture how the steel posts
 18 appear to have been bashed and knocked over, presumably
 19 during the incident. Are the concrete T bars any less
 20 secure?
 21 **A. Yes, they weigh 3 tonnes basically. So they'll take**
 22 **some moving.**
 23 Q. So although they are temporary --
 24 **A. They're temporary.**
 25 Q. -- are they any less sturdy --

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<p>1 A. No, certainly not.</p> <p>2 Q. -- than steel posts put in for permanence?</p> <p>3 A. Yes, but we could modify them to close them off but</p> <p>4 there's no way of closing off a temporary T bar chicane</p> <p>5 and in an emergency we need to close that chicane off to</p> <p>6 stop them getting to the gate.</p> <p>7 Q. Whereas this swinging steel barrier you told us about --</p> <p>8 A. It does work, it does function like that, yes.</p> <p>9 Q. So there is a chicane there and again, there is a double</p> <p>10 perimeter fence?</p> <p>11 A. Yes.</p> <p>12 Q. And therefore two gates to pass through before one gets</p> <p>13 into the CPF?</p> <p>14 A. Yes.</p> <p>15 Q. Is there anything different from those --</p> <p>16 A. Yes, they're pivot gates.</p> <p>17 Q. So these are two gates that's --</p> <p>18 A. Two vehicle gates. External and internal pivot gates.</p> <p>19 These were all -- they were always they were planned to</p> <p>20 be upgraded by the motorized gates as well, sliding</p> <p>21 gates.</p> <p>22 Q. You said they were always. Had there been a plan to</p> <p>23 upgrade them for longer than there had been at the BdV?</p> <p>24 A. To be honest after the construction phase, you know, we</p> <p>25 realised we had to wait until the construction and the</p> <p style="text-align: center;">Page 125</p>	<p>1 Q. The permanent access road. What is the purpose of that</p> <p>2 vehicle checkpoint?</p> <p>3 A. That vehicle checkpoint is there to carry out security</p> <p>4 searches and identification checks of all vehicles and</p> <p>5 personnel arriving and for the land transport team to</p> <p>6 carry out vehicle inspections.</p> <p>7 Q. It appears from the aerial photographs we have seen that</p> <p>8 that vehicle checkpoint is a building next to the road?</p> <p>9 A. Mmm.</p> <p>10 Q. Is it possible to avoid the checkpoint by simply driving</p> <p>11 off road and round?</p> <p>12 A. Yes, you can avoid the checkpoints from 350 degrees, the</p> <p>13 BdV is based on a flat plateau. The only area where</p> <p>14 a vehicle can't access the CPF directly is via the</p> <p>15 escarpment which is a kilometre to the south of the BdV</p> <p>16 which is a 100 metres escarpment. Above on the CPF on</p> <p>17 the BdV plateau you can come from any direction towards</p> <p>18 the CPF without going through any of our checkpoints.</p> <p>19 Q. And how much have you spent time driving out into the</p> <p>20 desert --</p> <p>21 A. Quite a lot. We carry out -- the expat liaison team</p> <p>22 carried out regular patrols out there or we did before</p> <p>23 the strike stopped all work.</p> <p>24 Q. How driveable is that desert?</p> <p>25 A. Yes, it's very driveable.</p> <p style="text-align: center;">Page 127</p>
<p>1 commissioning was done before we could make any further</p> <p>2 upgrades and so this was basically on the cards all</p> <p>3 along to put sliding gates in there. They should have</p> <p>4 always had sliding gates in there.</p> <p>5 Q. Why is that? What is the difference between the sliding</p> <p>6 gates and those pivot gates?</p> <p>7 A. They're more impact resistant.</p> <p>8 Q. Were there also guard towers around the CPF?</p> <p>9 A. No, there were no guard towers around the CPF.</p> <p>10 Q. Again, in terms of the fence around the CPF, was that</p> <p>11 based in the concrete like you were suggesting?</p> <p>12 A. No, it wasn't.</p> <p>13 Q. So that is the same construction?</p> <p>14 A. The same construction as the BdV.</p> <p>15 Q. As the BdV. Can I just ask about the VCP, the vehicle</p> <p>16 checkpoint. We have heard that there are two places</p> <p>17 called VCP, VCP1 and VCP2?</p> <p>18 A. Yes, there are three.</p> <p>19 Q. Where is the third one?</p> <p>20 A. The third one is the VCP for the Gendarmes.</p> <p>21 Q. Is that the place called La Recule?</p> <p>22 A. Yes.</p> <p>23 Q. Starting with number 1, that is the VCP on the road very</p> <p>24 close to --</p> <p>25 A. Yes, what we call the permanent access road.</p> <p style="text-align: center;">Page 126</p>	<p>1 Q. Have you personally been as far across as the Libyan</p> <p>2 border?</p> <p>3 A. Yes, I have, almost to the Libyan border but that was</p> <p>4 via the satellite fields, the dunes, it's very difficult</p> <p>5 to navigate.</p> <p>6 Q. Because?</p> <p>7 A. Because of the high dunes.</p> <p>8 Q. Sandy parts?</p> <p>9 A. The 100 metre, 200 metre dunes.</p> <p>10 Q. Is it possible to come from the Libyan border to where</p> <p>11 the facility was situated --</p> <p>12 A. Yes, it is.</p> <p>13 Q. -- avoiding those sand dunes?</p> <p>14 A. Sorry?</p> <p>15 Q. Avoiding those sand dunes?</p> <p>16 A. Yes.</p> <p>17 Q. Without using the metal road?</p> <p>18 A. Yes.</p> <p>19 Q. Indeed is there actually a metal road between the Libyan</p> <p>20 border and --</p> <p>21 A. There is up near Zarzaitine, yes.</p> <p>22 Q. But at the In Amenas level?</p> <p>23 A. No.</p> <p>24 Q. But again, if one has a 4 by 4 do we take it it's</p> <p>25 driveable?</p> <p style="text-align: center;">Page 128</p>

1 **A. Oh it is driveable. Even -- to the Tuaregs even the**
 2 **dunes are driveable, you know, these guys are really**
 3 **skilled drivers, so there's -- a dune needs to be pretty**
 4 **high to stop a Tuareg getting over it basically.**
 5 Q. And therefore if somebody wanted to approach the
 6 facility is it right to assume they wouldn't have to go
 7 through La Recule or VCP3 or VCP1?
 8 **A. That's right.**
 9 Q. I think VCP2 is the other side of the facility.
 10 **A. It's open land. It's a plateau. It's open land.**
 11 **That's why we have the 24 hour military protection zone**
 12 **in place.**
 13 MS DOLAN: Sir, I am about to move off that topic but
 14 I wonder if now is a convenient type to stop.
 15 THE CORONER: I was rather hoping can we do about another
 16 15 minutes and then break off until 2.05.
 17 MS DOLAN: I understand Mr Christie won't be here until
 18 2 o'clock so we may be starting with him after lunch.
 19 THE CORONER: What we might do is if we do another quarter
 20 of an hour with you and then start with Mr Christie at
 21 2.05 and put him in there.
 22 MS DOLAN: Moving to talk about the border and protection of
 23 the border between Algeria and Libya, were you aware of
 24 how that was affected, the protection of the border?
 25 **A. Since the Libya -- since the downfall of Gaddafi**
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1 **basically yes, we believe there was over 5,000 troops**
 2 **now patrolling the border and securing the border.**
 3 Q. When you say you believed that, what led you to think
 4 that?
 5 **A. Well, military announcement basically, an Algerian**
 6 **government announcement that they had deployed 5,000**
 7 **troops.**
 8 Q. Did you have any contact with the army commanders?
 9 **A. Who were on the border?**
 10 Q. Yes.
 11 **A. No.**
 12 Q. So apart from what were the announcements, the formal
 13 official announcements, what knowledge did you have of
 14 the capability of the Algerian military to protect the
 15 borders?
 16 **A. Well, capability, they are a professional army after**
 17 **all. They do have artillery pieces, tank regiments,**
 18 **paratroopers. The GGF, the Guard Gendarme Frontiers,**
 19 **are an infantry Gendarme. So they have the personnel to**
 20 **protect the border but the border is so porous.**
 21 **I suspect you would have to put a wall all the way down**
 22 **there to control it. It's immense.**
 23 Q. So it is a porous border and it's conceivable that
 24 people then can come through it --
 25 **A. Yes.**
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1 Q. -- with ill intent. We understand the next layer of
 2 protection is the military patrol in the oil field zone?
 3 **A. Yes, that's correct, the Gendarmes, 24 hour military --**
 4 Q. Before we get to the Gendarmes is there any distinction
 5 between those military who are protecting the border,
 6 actually the borders and those military rather than
 7 Gendarmes, the military, the army who are protecting the
 8 wider oil fields?
 9 **A. Yes.**
 10 Q. Or is this all one --
 11 **A. Yes, it was -- I understand what you are saying. The**
 12 **ANPs, the Army National Populaire, would be patrolling**
 13 **interior but the border would be controlled by the GGF.**
 14 Q. So there is a particular border force?
 15 **A. Yes, there is.**
 16 Q. And once you are across the border there is another
 17 force of --
 18 **A. Of army.**
 19 Q. Who are responsible for that?
 20 THE CORONER: Before you then get to the Gendarme?
 21 **A. Yes, before you get to the site.**
 22 THE CORONER: So we have dealt with the border, yes.
 23 MS DOLAN: Again that zone protection, before we get to the
 24 site specific protection, but that zone protection
 25 again, was that porous in the same way that the border
 Page 131

1 was porous?
 2 **A. It's difficult to say. It's obvious it must be very**
 3 **porous to allow 30 terrorists to get through it.**
 4 Q. But before the event happened was it perceived as -- was
 5 it known to be porous?
 6 **A. Yes, it's known to be porous. It's enormous. It's an**
 7 **enormous area, impossible to cover.**
 8 THE CORONER: Simply because of the size?
 9 **A. Yes.**
 10 MS DOLAN: So it's conceivable that people with ill intent
 11 can get through both of those layers?
 12 **A. It's conceivable.**
 13 Q. Then the next layer of protection are the Gendarmes
 14 specific to the In Amenas site. What was the size of
 15 the Gendarme force?
 16 **A. 160 troops at the CPF site.**
 17 Q. Did you know that that was the troop number? Were you
 18 told it or did you see troops equivalent and Gendarmes
 19 equivalent?
 20 **A. That was the number we logistically supported.**
 21 Q. By which you mean?
 22 **A. Fed them, fed and watered basically. So they were the**
 23 **amount of meals we were sending over on a daily basis.**
 24 Q. I think in your witness statement you call them
 25 a paramilitary force. You describe them as
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<p>1 a paramilitary force?</p> <p>2 A. No, no, not the -- well, I suspect in Europe that would</p> <p>3 be how you would call the Gendarmes, the Gendarmes are</p> <p>4 paramilitary.</p> <p>5 Q. What do you mean by that?</p> <p>6 A. These specific Gendarmes we had on site were actually</p> <p>7 Gendarmes with a specific role of a riot police as well.</p> <p>8 Q. Of course they are very different from what the British</p> <p>9 might think of police. It is not equivalent to police?</p> <p>10 A. No, it's not.</p> <p>11 Q. So explain what you understood their capabilities to be?</p> <p>12 A. Again, the Gendarmes we had on site, the brigade was</p> <p>13 a professional unit. There were no conscripts. They</p> <p>14 had medium to heavy weapons on site.</p> <p>15 Q. Which means what in fact?</p> <p>16 A. Like machineguns and mortars, 120 millimetre mortars,</p> <p>17 rocket launchers that type of thing. So they weren't</p> <p>18 a conventional police force, no.</p> <p>19 Q. I think you mentioned you had regular meetings with</p> <p>20 Captain Hocine?</p> <p>21 A. Yes.</p> <p>22 Q. How frequent was your liaison with the Gendarme camp?</p> <p>23 A. By telephone daily, except for Sunday -- sorry, the</p> <p>24 Saturday, which was his day off, and only in emergency</p> <p>25 would I contact him because he would basically go home</p> <p style="text-align: center;">Page 133</p>	<p>1 A. Yes. The expats are going out into the zone every day</p> <p>2 so it is to organise the protection of the expats who</p> <p>3 are going out into the zone.</p> <p>4 Q. And obviously if anybody is going into the zone, the</p> <p>5 rules are they have an escort?</p> <p>6 A. Yes, individual escort.</p> <p>7 Q. Set aside your discussions about escorts, which must</p> <p>8 have taken up a lot of that time, how much time was</p> <p>9 spent discussing the other risks that we have seen</p> <p>10 identified in your plan, the risks of attacks?</p> <p>11 A. I can't speak for Paul but I would go over there,</p> <p>12 I would be over there for an hour and a half discussing</p> <p>13 all types of security issues. So we would talk about</p> <p>14 the Mali situation, the Libyan situation. And in one</p> <p>15 instance when the US embassy was attacked and the US</p> <p>16 ambassador was killed, murdered I arranged a meeting</p> <p>17 immediately with the captain and asked how secure we</p> <p>18 were and he assured me that there is no threat to expats</p> <p>19 or to the project. He gave me his assurances 100 per</p> <p>20 cent.</p> <p>21 Q. When was that?</p> <p>22 A. That was in December 2012.</p> <p>23 Q. Did you have any discussions with him about what might</p> <p>24 happen if the porous border and porous military zone was</p> <p>25 breached?</p> <p style="text-align: center;">Page 135</p>
<p>1 to his family in In Amenas on the Friday afternoon,</p> <p>2 which is their weekend. But daily meetings in his</p> <p>3 office, he would visit our office two or three times</p> <p>4 a week.</p> <p>5 Q. What would those meetings tend to be about?</p> <p>6 A. Security.</p> <p>7 Q. Which aspect of security?</p> <p>8 A. The threat, any perceived threat, any increase in alert</p> <p>9 levels, that type of thing. We would also discuss all</p> <p>10 the security incidents that we've -- that have been</p> <p>11 reported to us or we've discovered ourselves to ask for</p> <p>12 verification, for confirmation.</p> <p>13 Q. Would he provide that confirmation?</p> <p>14 A. Not always, no, no, very rarely in fact.</p> <p>15 Q. So although you describe this as discussion it doesn't</p> <p>16 sound like much information is coming from</p> <p>17 Captain Hocine to you?</p> <p>18 A. I think it's widespread through Algeria. It's</p> <p>19 basically -- they don't want to worry expats. They</p> <p>20 don't want to stop any foreign investment, so basically</p> <p>21 they don't want to talk about security issues, serious</p> <p>22 terrorist issues et cetera et cetera.</p> <p>23 Q. So your almost daily meetings, is most of that just to</p> <p>24 arrange escorts for people who are going around the</p> <p>25 field?</p> <p style="text-align: center;">Page 134</p>	<p>1 A. Yes, of course.</p> <p>2 Q. Tell us what was the content of those discussions?</p> <p>3 A. It was the readiness of his quick reaction force, so his</p> <p>4 QRF team. And we drilled this team on a number of</p> <p>5 occasions or the captain had drilled it and I just</p> <p>6 observed basically and his reaction time was ten minutes</p> <p>7 basically. So he had a 24 hour QRF on site at the</p> <p>8 Gendarme camp and ready to intervene at the BdV or the</p> <p>9 CPF or around the zone within ten minutes.</p> <p>10 Q. Tell us about these drills?</p> <p>11 A. Yes.</p> <p>12 Q. So there is a quick reaction force and first of all, how</p> <p>13 big is the force?</p> <p>14 A. It's approximately 12 men.</p> <p>15 Q. And you saw it doing some drills?</p> <p>16 A. Yes, yes.</p> <p>17 Q. How often did drills happen?</p> <p>18 A. Sometimes they wouldn't announce the drills but we would</p> <p>19 always try to say, look, especially when they're using</p> <p>20 blank rounds, to simulate an attack, and we'd say look,</p> <p>21 you really need to tell us about this because it does</p> <p>22 upset people and it worries people when the military are</p> <p>23 running around the perimeter of the fence firing blank</p> <p>24 rounds. So we did get away from that. We stepped away</p> <p>25 from that so there was no blank round firing and --</p> <p style="text-align: center;">Page 136</p>

<p>1 Q. Can I come back to how often did the drills happen in 2 your mind?</p> <p>3 A. I would say once every rotation, so once monthly 4 basically. Around this base, around the CPF, around the 5 rig site.</p> <p>6 Q. Were you involved in witnessing them, involved with the 7 Gendarmes rather than you happened to see a drill going 8 ahead?</p> <p>9 A. No, we have to stay out of it. We have to stay out of 10 it. So we don't actually observe as observers following 11 the military. We just had to keep away from them.</p> <p>12 Q. But you would be told the drill was happening?</p> <p>13 A. Sometimes.</p> <p>14 Q. And you would see it happening?</p> <p>15 A. Yes.</p> <p>16 Q. But see it from a distance?</p> <p>17 A. A long distance, yes.</p> <p>18 Q. And what was the drill they were doing?</p> <p>19 A. They were doing a reaction to an armed attack on the 20 camp basically or on a location, so a CPF, a drilling 21 rig, or the BdV.</p> <p>22 Q. And what would you see them doing?</p> <p>23 A. You would see them mobilise from the Gendarme camp, 24 intervene around the perimeter to secure the perimeter 25 of BdV or the CPF.</p> <p style="text-align: center;">Page 137</p>	<p>1 patrolling night and day. During the day that's 12 2 vehicles. There's patrol vehicles as well as individual 3 escorts for the expats to go into the field during the 4 day and at night there are five further vehicles who are 5 at the discretion of the Gendarmes who carry out 6 permanent patrols around the area. So they are the 7 first line of defence. The QRF is there just on standby 8 to intervene.</p> <p>9 MS DOLAN: So the QRF is useful if those patrol vehicles 10 have spotted something and they notify the QRF?</p> <p>11 A. Yes.</p> <p>12 Q. But if what has happened has not been spotted or is not 13 spotted until people get to VCP1 is it fair to say that 14 the QRF are now going to be late?</p> <p>15 A. Well, no. If we all follow procedures, and as most of 16 the gentlemen have and ladies have followed procedure 17 they would lock themselves down within the base. They 18 would lock themselves down. Find a secure area to hide. 19 That would give the military time to get into the camp 20 basically and that time, ten minutes, would allow the 21 military to subdue any attacker I should think.</p> <p>22 THE CORONER: Also to go after the people who had got in 23 whilst they were --</p> <p>24 A. Exactly, and if that happened within ten minutes the 25 hostage takers or attackers wouldn't have time to round</p> <p style="text-align: center;">Page 139</p>
<p>1 THE CORONER: That was what I was going to ask. The attack 2 that they are mobilising in the ten minutes to prevent 3 them -- almost by definition it needs to be ten minutes 4 away really doesn't it because if it is less than that 5 they're still putting their boots on.</p> <p>6 A. No, they are not. These are troops who are specifically 7 segregated from the rest of the troops within the 8 Gendarme base.</p> <p>9 THE CORONER: But I am just saying --</p> <p>10 A. And they had their boots on for 24 hours basically. 11 They are on standby.</p> <p>12 THE CORONER: Don't worry about their boots. But if the 13 attack is in progress I mean, it will proceed presumably 14 I just want to understand the ten minutes. I understand 15 that if somebody at La Recule, which I have marked on 16 here, somebody there phones the Gendarme camp and says 17 "look, someone's actually got through the porous border, 18 they're driving not on the road but across the sand" 19 then I can see that they'd get there ten minutes and 20 they're all ready and waiting. I can see that. But 21 I am just wondering about how much use they are if, for 22 example, there hasn't been a warning of ten minutes or 23 less.</p> <p>24 A. Don't forget we have a 24 hour military protection zone 25 in place. So we have vehicles out, out in the zone</p> <p style="text-align: center;">Page 138</p>	<p>1 up any of the expats. It would be impossible. They 2 would be fighting a firefight within the base and that 3 was understood.</p> <p>4 MS DOLAN: So your understanding was that if somebody 5 breached the base gate and it was only at that stage 6 a warning was given the military would within ten 7 minutes --</p> <p>8 A. Have intervened.</p> <p>9 Q. At least 12 of them intervened?</p> <p>10 A. That is only the first, the QRF and then the remaining 11 Gendarmes would follow.</p> <p>12 Q. 12 would intervene within ten minutes?</p> <p>13 A. Yes.</p> <p>14 Q. And you understood they had the ability to engage the 15 attackers?</p> <p>16 A. Yes.</p> <p>17 Q. Even if by that time the attackers are already inside 18 the base?</p> <p>19 A. Yes, they would intervene inside the base. The 20 Gendarmes will come -- that's part of the procedure. 21 That's why we explained to all the nationals and expat 22 staff that on arrival they receive a security induction, 23 a liaison induction and we specifically explain to them 24 the actions to take in case of an armed attack on the 25 camp, either day or night, and this leads into the</p> <p style="text-align: center;">Page 140</p>

35 (Pages 137 to 140)

<p>1 Gendarmes will intervene, they will enter the camp.</p> <p>2 THE CORONER: It just shows how important it is obviously to</p> <p>3 stop anybody getting in.</p> <p>4 A. Yes.</p> <p>5 MS DOLAN: And your understanding that they would enter the</p> <p>6 camp --</p> <p>7 A. Yes, they would enter the camp.</p> <p>8 Q. -- came from where?</p> <p>9 A. From the captain, from the Gendarmes.</p> <p>10 Q. Was that written in any document?</p> <p>11 A. It's part of the security induction we give.</p> <p>12 Q. The security induction we have seen it, I think you will</p> <p>13 find it. It is at tab 10 of that green bundle. It</p> <p>14 certainly does have a page --</p> <p>15 A. Sorry, 10?</p> <p>16 Q. Tab 10 of the green bundle. And then if you turn to</p> <p>17 page 70 in the bottom right-hand corner?</p> <p>18 A. Yes.</p> <p>19 Q. There is the instructions given to the staff. Some</p> <p>20 staff have confirmed that they recall being given these</p> <p>21 instructions, some don't. But clearly it is in the</p> <p>22 document?</p> <p>23 A. Yes, it is and there is also an -- in every internal</p> <p>24 bedroom door there is actually the actions to take in</p> <p>25 Arabic, French and English.</p> <p style="text-align: center;">Page 141</p>	<p>1 had time to complete it, take it over lunch but I should</p> <p>2 remind him not to talk to anyone whilst giving his</p> <p>3 evidence.</p> <p>4 THE CORONER: If you would like to then by all means. Don't</p> <p>5 talk to anyone about your evidence but by all means take</p> <p>6 your statement but keep it to yourself.</p> <p>7 A. Okay, fine.</p> <p>8 (1.17 pm)</p> <p>9 (Luncheon Adjournment)</p> <p>10 (2.05 pm)</p> <p>11 MS DOLAN: Sir, just as you were coming into court there was</p> <p>12 a request that some of the families have found it</p> <p>13 difficult to pick out places on maps when they are</p> <p>14 spoken about and they were asking whether there is</p> <p>15 a cursor or something that can show on the map.</p> <p>16 Unfortunately we don't have that facility but what the</p> <p>17 tech guys can do is put a red circle around something.</p> <p>18 They can put it on and the witness can confirm it is in</p> <p>19 the right place. The witness can't put that circle on.</p> <p>20 I am just saying that so if any advocates are asking</p> <p>21 questions using that facility to circle something would</p> <p>22 assist the members of the public to understand.</p> <p>23 THE CORONER: I don't know if we have any spares of the</p> <p>24 marked ones because I would be very happy if that would</p> <p>25 help. It is the ones that I am finding -- I know they</p> <p style="text-align: center;">Page 143</p>
<p>1 Q. As we have heard from Mr Matthews this morning.</p> <p>2 THE CORONER: Printed on the back of the door?</p> <p>3 A. Yes, it is, yes.</p> <p>4 MS DOLAN: So those are the instructions to the staff. What</p> <p>5 isn't in this document, and probably one wouldn't expect</p> <p>6 to see it in this document --</p> <p>7 A. No.</p> <p>8 Q. -- is it documented that because the quick reaction</p> <p>9 force, followed in time by their colleagues, will come</p> <p>10 into the camp and engage the attackers if the gate is</p> <p>11 breached. Is there a document where we would find that?</p> <p>12 A. No, no. There are certain things you can't write down</p> <p>13 basically, but ...</p> <p>14 Q. But that was verbally the assurance to you and your</p> <p>15 expectation?</p> <p>16 A. Yes, yes.</p> <p>17 MS DOLAN: Sir, I wonder if that is a good place to stop.</p> <p>18 THE CORONER: We are just going to break off now. We are</p> <p>19 going to start again at 2.05 but it is just going to be</p> <p>20 with another witness who will be very short. How long</p> <p>21 do we think, about ten minutes, something like that? So</p> <p>22 start again with you at 2.15, is that all right?</p> <p>23 A. Very good, sir.</p> <p>24 MS DOLAN: Sir, I wonder if it is helpful. Mr Fitzpatrick</p> <p>25 had started looking at his witness statement and hadn't</p> <p style="text-align: center;">Page 142</p>	<p>1 are not, as it were, entirely necessarily agreed but it</p> <p>2 certainly takes one to the main place. The maps that</p> <p>3 I have are like this. What we will do is -- let us see</p> <p>4 if we have any now. If we do not we'll put that in</p> <p>5 train. Would that help? They are a bit better, aren't</p> <p>6 they?</p> <p>7 MR POPAT: We will certainly get them done overnight. For</p> <p>8 the moment perhaps I can hand back mine. We can share</p> <p>9 it on this bench.</p> <p>10 THE CORONER: You are very kind, Mr Popat. I am sure that</p> <p>11 is much appreciated by everybody. Thank you.</p> <p>12 MS WATSON: Sir, in addition the officers have gone and</p> <p>13 acquired some laser pointers. And I think Mr Charnock</p> <p>14 is telling me that they don't work.</p> <p>15 MR CHARNOCK: When you put them onto an LCD screen they</p> <p>16 disappear so you can't point at them.</p> <p>17 MS DOLAN: You can't point them at an LCD screen.</p> <p>18 MS WATSON: I don't know if it would help when advocates are</p> <p>19 asking to point things out if someone is holding a map</p> <p>20 up whether it would work then, is that another option?</p> <p>21 THE CORONER: We will do that and also we'll make sure we</p> <p>22 have some more for tomorrow. So that should mean that's</p> <p>23 that.</p> <p>24 Can I just say one other thing before we carry on,</p> <p>25 is that what I thought we will do is just review at the</p> <p style="text-align: center;">Page 144</p>

<p>1 break, perhaps you can all do that when we have the 2 break with Ms Dolan, and we can just see how much 3 progress we have made. Obviously I don't want to sit on 4 very late. It is difficult for everybody and I do 5 understand that. So we'll just see at the break how 6 long we need to go for.</p> <p>7 MS DOLAN: Sir, the next witness to be interposed is 8 Mr Christie.</p> <p>9 MR ANDREW CHRISTIE (sworn) 10 Questions from MS DOLAN</p> <p>11 MS DOLAN: Mr Christie, I'm Bridget Dolan and I ask 12 questions on behalf of the coroner. Could you give us 13 your full name please?</p> <p>14 A. Andrew Christie.</p> <p>15 Q. What is your occupation?</p> <p>16 A. I'm a director of the Orion Group.</p> <p>17 Q. And what is the Orion Group?</p> <p>18 A. The Orion Group are a worldwide employment agency.</p> <p>19 Q. I think that you had placed two people at In Amenas who 20 lost their lives in the events that this inquest is 21 concerned with; is that correct?</p> <p>22 A. That is correct, two people did lose their lives, one of 23 them was a Filipino gentleman.</p> <p>24 Q. That was Illuminado Santalo?</p> <p>25 A. Correct.</p> <p style="text-align: center;">Page 145</p>	<p>1 which BP AMOCO Exploration In Amenas Limited requested 2 his services.</p> <p>3 Q. So they requested services from you who are employing 4 him and therefore you provide him to the JV?</p> <p>5 A. That is correct.</p> <p>6 Q. That is it in simple terms?</p> <p>7 A. In simple terms.</p> <p>8 Q. If one of your people was being sent to any venture but 9 In Amenas in particular, who was responsible for, 10 firstly before they travelled advising them about the 11 security context in which they would be working and the 12 potential risks which would allow someone to make the 13 decision about whether they took up the placement?</p> <p>14 A. Well, in the case of Mr Bilsland he had been working on 15 this contract one year nine and a half months before his 16 death. So that from that perspective he would have been 17 fully familiar with the site and security arrangements 18 over that lengthy time period. But the normal course of 19 events is that an individual is given certain sort of 20 general information relating to travel arrangements, 21 medical arrangements, by that I mean vaccinations and 22 such like that might be required and then the sort of 23 oil company concerned, in this case it would be the JV 24 Gas, as an entity, would arrange for site induction at 25 which particular information would be passed to the</p> <p style="text-align: center;">Page 147</p>
<p>1 Q. And the other was Mr Bilsland?</p> <p>2 A. Correct.</p> <p>3 Q. It would assist us if you could explain the capacity in 4 which Mr Bilsland in particular worked at In Amenas and 5 specifically was he one of your employees or was it your 6 view that he was employed by someone else?</p> <p>7 A. No, he was an employee of our group of companies.</p> <p>8 Q. So you understood he was an employee of Orion?</p> <p>9 A. Correct.</p> <p>10 Q. And then what was the relationship between Orion and the 11 JV that placed Mr Bilsland at In Amenas?</p> <p>12 A. Well, Mr Bilsland was contracted on a call forward order 13 from BP AMOCO Exploration In Amenas Limited. Call 14 forward order number 73.</p> <p>15 Q. Explain for those of us that don't know the -- I don't 16 even know the term.</p> <p>17 A. It is a sort of subsidiary order to the main contract, 18 the overarching contract, and the overarching contract 19 was In Salah Gas, a JOB involving Sonatrach SPA, BP 20 AMOCO Exploration In Amenas Limited and Statoil North 21 Africa Oil AS, commonly known as JV Gas.</p> <p>22 Q. So do we understand that they have a contract with Orion 23 which requires you to provide personnel to them?</p> <p>24 A. Well, the subsidiary, basically yes, but the actual, 25 Mr Bilsland, the call forward order was the mechanism by</p> <p style="text-align: center;">Page 146</p>	<p>1 individual. They may request of us to provide 2 additional documentation to the individual at the time 3 of hire but generally speaking, and I believe in this 4 case, it would have been the case that a sort of site 5 induction would have taken place on arrival.</p> <p>6 Q. Therefore, do we gather from what you are saying was 7 that your understanding was that the responsibility of 8 site induction lay with the JV?</p> <p>9 A. That's correct.</p> <p>10 Q. Was there any suggestion to you or any reason for you to 11 think that those who were direct employees of BP would 12 have any, or Statoil or Sonatrach, would have any 13 different induction from those who, like Mr Bilsland, 14 were contractors?</p> <p>15 A. I cannot comment on that in the sense that I don't have 16 knowledge of that information.</p> <p>17 MS DOLAN: Thank you. I have no more questions for you. 18 Others may.</p> <p>19 Questions from MR FLINN</p> <p>20 MR FLINN: Mr Christie, my name is Matthew Flinn and I ask 21 questions on behalf of the family of Carson Bilsland. 22 Just so the family can be clear on it. I think you have 23 already addressed these questions to some extent but 24 your company or your group of companies provided 25 personnel to the company at In Amenas and that would be</p> <p style="text-align: center;">Page 148</p>

1 by way of personnel supply contract; is that correct?
 2 **A. That's correct.**
 3 Q. And the entity with which you contracted was I think you
 4 called it JV or In Salah Gas, is that correct?
 5 **A. In Salah Gas, an entity which comprised Sonatrach SPA,**
 6 **BP Exploration, Al Jazeera Limited and Statoil North**
 7 **Africa Gas AS, commonly known as In Salah Gas, JOB**
 8 **members.**
 9 Q. I think we heard from Mr Cobb who gave evidence a few
 10 days ago that the JV was an unincorporated association.
 11 So based on what you have described is that the effect
 12 of entering that contract is that you are essentially in
 13 an arrangement with the three companies that comprise
 14 it?
 15 **A. That's correct although, as I mentioned a little earlier**
 16 **the call off order for Mr Bilsland's services came via**
 17 **BP AMOCO Exploration In Amenas Limited.**
 18 Q. Yes, thank you for clarifying that. Now, when that call
 19 off order was made and he was provided to BP AMOCO
 20 Exploration In Amenas Limited was it the understanding
 21 or the agreement that he would be provided specifically
 22 to the In Amenas project or was there the possibility
 23 that he could be sent somewhere else?
 24 **A. I suppose in very general terms there was the**
 25 **possibility. There are a number of sites around the --**
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1 **in the general area. It could be possible that he may**
 2 **be seconded on the instruction of JV personnel or BP**
 3 **personnel to carry out site inspection activities at**
 4 **other sites. That would be their decision, but my**
 5 **understanding was that he commonly operated to be**
 6 **In Amenas. But obviously I'm sure you'd appreciate that**
 7 **we weren't monitoring his day-to-day activities.**
 8 Q. Yes, I understand. Thank you. This call off order, it
 9 might be quite helpful to the family, I don't know if
 10 you have been given a small bundle of papers that should
 11 be in front of you. On the first page we can see
 12 a letter dated 20 December in which Mark Donnison writes
 13 to Carson advising him that his interview with BP
 14 In Amenas was successful. If we then flip over the
 15 page, to page 2, there is reference to him being on
 16 a contract with BP Exploration Limited and then if we
 17 turn over the page again to page 3 we see, "I am writing
 18 in reference to your assignment through Orion with BP
 19 Exploration In Amenas Limited."
 20 So is it the fact that this call off order which you
 21 have referenced, call off 73 I think you said, would
 22 that explain what those references to BP specifically
 23 are in this documentation?
 24 **A. Yes. Obviously there are -- one is an extension to**
 25 **contract. The other is an earlier contract. There was**
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1 **some clarification with regard to Mr Bilsland's job**
 2 **title, variously as NDT technician and also he was**
 3 **referred to as a multi-disciplined inspector and in his**
 4 **last call off order as site inspection engineer.**
 5 Q. I think what the family is trying to understand is why
 6 there are these references to BP AMOCO Exploration as
 7 opposed to the JV project. So what I am just exploring
 8 with you very briefly is that the reason why that entity
 9 is referred to is because of the call off order which
 10 you mentioned that it was BP AMOCO Exploration which
 11 utilised that mechanism to bring him into the JV
 12 project?
 13 **A. Correct.**
 14 Q. Thank you very much. Do you know if Carson was aware
 15 that in fact he was not going to be working for BP
 16 specifically but for a JV project before he was sent
 17 there?
 18 **A. I don't know that specifically in the sense that**
 19 **I wasn't present at the time, you know, conversations**
 20 **took place between him and my colleagues within Orion,**
 21 **but I think that discussion would have -- and this is**
 22 **conjecture really on my part -- but discussion would**
 23 **have taken place that it was a JV of the nature of which**
 24 **I have previously described and that BP as a member of**
 25 **that JV were the entity by which they were going to**
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1 **engage his services on behalf of the JV.**
 2 Q. I think you mentioned to Ms Dolan that you would
 3 suppose, and it is a reasonable supposition, that Carson
 4 would have been provided with information about the
 5 security situation that he was in when he was out there
 6 because he was out there for a fair portion of time?
 7 **A. Yes, and maybe over -- if the security situation had**
 8 **changed he may be made aware of changes over a period of**
 9 **one year and nine and a half months.**
 10 Q. Indeed. Are you able to assist with this: did BP AMOCO
 11 Exploration In Amenas Limited or any other of the JV
 12 participating companies provide yourself or Orion
 13 generally with any information about the security risks
 14 involved with the JV project at the time you were
 15 formulating the personnel supply contract?
 16 **A. I personally wouldn't be able to give you precise**
 17 **information on that, as I wasn't party to that**
 18 **discussion. However, the ongoing risks are monitored**
 19 **and even with regard to ourselves we have various phone**
 20 **apps as they are known by now whereby organisations**
 21 **called control risks who are response consultants of**
 22 **a security nature provide day-to-day updates should you**
 23 **wish and Carson would have been given information on**
 24 **that particular app as would all of our contractors.**
 25 Q. So far as you are aware he didn't receive specific
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<p>1 information on that before mobilising; is that right?</p> <p>2 A. On?</p> <p>3 Q. On the security issues surrounding the In Amenas</p> <p>4 project?</p> <p>5 A. From us or from BP?</p> <p>6 Q. Well, it might have come through you or it might have</p> <p>7 come directly from BP. Either situation. And it might</p> <p>8 be something that you can't comment on?</p> <p>9 A. I can't really comment on to be quite honest because</p> <p>10 I wasn't party to that information at the time.</p> <p>11 Q. Finally, Mr Christie, once the mobilisation had occurred</p> <p>12 you had no day-to-day control over his working</p> <p>13 environment or activities, did you?</p> <p>14 A. No, we were not the directing mind. Our job was to</p> <p>15 search and select personnel and then make payroll</p> <p>16 arrangements to ensure that they were appropriately paid</p> <p>17 and in this particular instance also with regard to</p> <p>18 travel BP I believe arranged -- made the travel</p> <p>19 arrangements. We would have been responsible for</p> <p>20 ensuring he received a medical before he went which he</p> <p>21 did indeed have from us, well, from our medical advisers</p> <p>22 prior to assignment.</p> <p>23 Q. And that needed to be a BP approved medical, is that</p> <p>24 correct?</p> <p>25 A. Let me just look at my information that I have here</p> <p style="text-align: center;">Page 153</p>	<p>1 role of the Gendarmes?</p> <p>2 A. The Gendarmes on site?</p> <p>3 Q. Yes.</p> <p>4 A. If they hadn't had time to subdue the attackers, which</p> <p>5 they should have within ten minutes, I suspect they</p> <p>6 would have waited for reinforcements or special forces.</p> <p>7 Q. I think what you said in your witness statement</p> <p>8 provided, I think it was back in January, was that once</p> <p>9 the situation progressed to a hostage situation the</p> <p>10 Gendarmes were required to pass the responsibility to</p> <p>11 the military.</p> <p>12 A. Well, special forces would have been involved. The</p> <p>13 government would have been involved basically. I would</p> <p>14 expect them to stand down, the Gendarmes would have</p> <p>15 stood down.</p> <p>16 Q. In a sense does that mean if the situation arose as it</p> <p>17 appears might have happened at In Amenas that very</p> <p>18 rapidly after entering the BdV a hostage was taken at</p> <p>19 that point the Gendarmes in a sense were required to</p> <p>20 stop and defer and wait for the military to arrive?</p> <p>21 A. I doubt that very much. If they would have been there</p> <p>22 before -- within the ten minutes then they would have</p> <p>23 begun to attack the aggressors basically.</p> <p>24 Q. Even if a hostage was already taken by the time they got</p> <p>25 there?</p> <p style="text-align: center;">Page 155</p>
<p>1 myself in that regard. (Pause) Yes, it was a medical</p> <p>2 completed, the BP health clearance process for</p> <p>3 expatriate rotational assignment. This was undertaken</p> <p>4 dated 5/1/11. Findings: medically suitable to travel.</p> <p>5 Signed by Dr Joan Patterson NBCHB, MOEH Abermed Limited,</p> <p>6 Fosterhill House, Fosterhill Road, Aberdeen, who are</p> <p>7 a firm of occupational health medical specialists.</p> <p>8 MR FLINN: Mr Christie, thank you very much for coming</p> <p>9 a long way to answer my questions today. Sir, thank you</p> <p>10 for the opportunity to ask them.</p> <p>11 THE CORONER: Anybody else? No. Thank you very much indeed</p> <p>12 for coming. I am grateful to you. Thank you very much</p> <p>13 too, Mr Flinn, for keeping that within the bounds which</p> <p>14 you undertook. I am very grateful.</p> <p>15 (The witness withdrew)</p> <p>16 THE CORONER: Yes, so we can return.</p> <p>17 MR ANTHONY JOSEPH FITZPATRICK (continued)</p> <p>18 Questions from MS DOLAN (continued)</p> <p>19 MS DOLAN: Mr Fitzpatrick, before the break I think we were</p> <p>20 talking about the quick reaction force and you had said</p> <p>21 that your impression was that the Gendarmes would</p> <p>22 intervene and would enter the camp if an event requiring</p> <p>23 that had happened.</p> <p>24 A. Yes.</p> <p>25 Q. Once a hostage situation had happened what then was the</p> <p style="text-align: center;">Page 154</p>	<p>1 A. I can't speak for them but that was the procedure.</p> <p>2 Basically that was the procedure, for expats and</p> <p>3 nationals to lock down and for the Gendarmes to</p> <p>4 intervene in the interior of the camp.</p> <p>5 Q. So when your witness statement said that once it</p> <p>6 progressed to a hostage situation they were required to</p> <p>7 pass responsibility to the military it is not as bald as</p> <p>8 it sounds. They don't lose authority at that point.</p> <p>9 They can continue to act even with a hostage?</p> <p>10 A. If they are involved in a conflict immediately in a</p> <p>11 contact situation obviously they wouldn't have deferred</p> <p>12 obviously. They would have continued.</p> <p>13 Q. Can I just ask you a little bit more about the Gendarme</p> <p>14 patrols because I think you started in answer to an</p> <p>15 earlier question to talk about the patrols and you said</p> <p>16 there was 12 patrols I think in the daytime and five at</p> <p>17 night?</p> <p>18 A. Mmm.</p> <p>19 Q. These patrols, where did they patrol?</p> <p>20 A. They patrolled within the CPF zone, what we call the CPF</p> <p>21 zone which is between the CPF itself, the BdV and the</p> <p>22 two VCPs, VCP1 and VCP2.</p> <p>23 Q. How frequent were these patrols?</p> <p>24 A. They were 24 hour patrols.</p> <p>25 Q. That doesn't tell us about for frequency. That tells us</p> <p style="text-align: center;">Page 156</p>

<p>1 they are meant to be present all the time? 2 A. Yes. 3 Q. But how often would one expect to see a vehicle with 4 Gendarmes in it moving around? 5 A. You would expect to see them most of the day, most of 6 the day obviously. 7 Q. And when you talk about the area between the BdV and the 8 CPF that means the area left and right of the tarmacked 9 road? 10 A. Yes, it does, yes. 11 Q. There have been a few witnesses already who have given 12 evidence that they didn't see patrols during the day. 13 Given what you have described would one expect them to 14 see patrols if a worker is travelling between the BdV 15 and the CPF in the morning? 16 A. No, of course not. 17 Q. At lunchtime? 18 A. The patrols have a larger perimeter. It would be pretty 19 pointless for a patrol to be on the same tarmac that the 20 expats are travelling on. They wouldn't be able to 21 respond to an attack. So they flank guard the whole 22 operation. 23 Q. How large was that perimeter? If we take the road 24 perhaps as the centre of -- 25 A. You could say 2 or 3 kilometres out. I would say Page 157</p>	<p>1 Q. And the patrol vehicles themselves, who drives them? 2 A. The military escort drivers, so the drivers under our 3 management. The Tuaregs basically. 4 Q. So the drivers of the vehicles are the locals, the, 5 drivers as we hear them referred to? 6 A. The local civilians, yes. 7 Q. But they are carrying Gendarmes in the vehicles? 8 A. Yes. 9 Q. And the vehicles, which vehicles are those? 10 A. They are JV vehicles, JV Landcruisers. 11 THE CORONER: Can I just ask, so the Gendarmes wouldn't 12 drive themselves, they would have the local drivers 13 would -- 14 A. Yes, they do have their own vehicles within the base. 15 The Gendarme vehicle is green and white as we call them 16 basically but they use those for urgencies, emergencies 17 or their own work that they have to do for the Wali of 18 the region, the governor of the region basically. All 19 the work that's carried out for the JV is done in our 20 own vehicles. 21 THE CORONER: So they conceivably, the drivers could find 22 themselves in a very dangerous situation I suppose? 23 A. Yes. 24 THE CORONER: Where real special driving skills were needed? 25 A. Yes. Page 159</p>
<p>1 2 kilometres, 3 kilometres circumference around the 2 whole area. 3 Q. Around the whole complex? 4 A. Mmm. 5 Q. Did you actually see these patrols happening? 6 A. Yes, yes. 7 Q. When did you see these patrols happening? 8 A. Whenever I went out because I would visit them. That 9 was part of the job obviously to make sure that the 10 military are carrying out their duties. 11 Q. If they are patrolling day and night are there shift 12 changes in these patrols? 13 A. Yes. 14 Q. When did they happen? 15 A. 4.30 in the morning. 4.30 to 5 o'clock and then in the 16 evening 16.30 to 1700. 17 Q. So these are 12 hour shifts -- 18 A. 12 hour shifts. 19 Q. -- that the Gendarmes are doing. So would there be some 20 gap in patrols between one shift -- 21 A. No. That was identified early on and in fact the new 22 captain, Captain Hocine, he ensured that the vehicles 23 that were already on patrol would stay out until the 24 relieve, as we call it, the following shift, would go 25 out to relieve them basically in the zone. Page 158</p>	<p>1 THE CORONER: Did they have those? 2 A. Yes, they do. They're exceptional drivers. 3 MS DOLAN: Was there any audit carried out to check whether 4 the patrols were actually happening and that handovers 5 were actually happening? 6 A. Yes, that's part of our job as well, we would go out and 7 just ensure that these patrols are happening. 8 Q. What was that audit? 9 A. A physical, a physical check most of the time. 10 Obviously early in morning we can't leave the base until 11 5.30 but it would be speaking to drivers, that type of 12 thing, seeing that everything's been done okay. We had 13 a head driver in charge as well. A local who works very 14 closely with the military and ourselves. So if we 15 identified any gaps or anything we would ... 16 Q. During the drivers strike we understand that there was 17 limited personnel available for the escort duties? 18 A. Mmm. 19 Q. What impact did the drivers strike have upon these 20 patrols? 21 A. Well, there were no patrols. Well the patrols were 22 carried out, sorry, by the gendarmes themselves in their 23 own vehicles. So they used their own vehicles. 24 Q. Were there then less patrols, there were still the 12 25 and five? Page 160</p>

40 (Pages 157 to 160)

1 **A. No there weren't 12. There were five, five. So five**
 2 **days and five nights because there was no need for**
 3 **individual escorts for expats because the work had**
 4 **stopped basically. It had been put on hold.**
 5 Q. In respect of warning Gendarmes if something has
 6 happened, what was the procedure to alert the Gendarmes
 7 that their attention to the base might be needed in the
 8 event of an emergency?
 9 **A. We have 24 hour communications with them, live**
 10 **communications via radio. So we would basically just**
 11 **inform them -- alert them immediately by radio or**
 12 **telephone.**
 13 Q. Who would hold those radios?
 14 **A. All the liaison team have radios, direct contact with**
 15 **the Gendarmes.**
 16 Q. So at the material time that would have been
 17 Paul Morgan?
 18 **A. Paul was on the convoy. He would have had a radio with**
 19 **him inside the vehicle. A vehicle fit radio. Yann**
 20 **Desyeux would have had a radio as well on the base.**
 21 Q. Anybody else would have a radio straight to contact the
 22 Gendarmes?
 23 **A. The liaison team. All the drivers, the radio operators.**
 24 Q. So all of the drivers --
 25 **A. All the drivers have radios.**

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1 Q. -- would have a radio to the Gendarmes?
 2 **A. Yes and the radio operators as well are in 24 hour**
 3 **contact with the military.**
 4 Q. So any of those people could alert the military to the
 5 need?
 6 **A. Yes.**
 7 Q. Can I just ask you about the bus that leaves the base to
 8 be escorted off to the airport. What was the timing of
 9 the bus leaving in January 2013? Are you aware of at
 10 what time the bus was bound to leave?
 11 **A. The bus on the morning of the 16th? It left at 5.30.**
 12 Q. Was that a change from previous?
 13 **A. Yes, it was.**
 14 Q. Are you aware of when it changed?
 15 **A. A week or so before I believe.**
 16 Q. When did it used to leave?
 17 **A. 6 o'clock.**
 18 Q. So if a bus left at 5.45 on the 16th would that have
 19 been a delayed departure?
 20 **A. Well, yes, but it's -- unfortunately with the military**
 21 **sometimes the military arrive a little bit late**
 22 **sometimes for an escort departure. So we have to build**
 23 **in ten minutes either way.**
 24 Q. So when you say the bus left at 5.30 do we get the
 25 impression it wasn't usually prompt or?

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1 **A. Well, I believe Paul's handover notes to me said that**
 2 **the escort was leaving at 5.30. I don't know if it was**
 3 **delayed.**
 4 Q. Whether it was or not was it unusual for the bus to be
 5 delayed?
 6 **A. No, no, no.**
 7 Q. Can you tell us when a bus leaving the site was
 8 approaching VCP1 what would be the normal procedure that
 9 one followed for that escort to get to and come through
 10 VCP1? Would there be procedures one followed?
 11 **A. Yes, once the escort would arrive at the VCP1 basically**
 12 **the vehicles would stop, the guards would then identify**
 13 **who was in the vehicles and allow them to pass.**
 14 Q. Would VCP1 have any barrier?
 15 **A. Yes, there's a vehicle access barrier across the road.**
 16 **It wouldn't be a full inspection. It would just be**
 17 **a verification, control order missions et cetera**
 18 **et cetera.**
 19 Q. So there would be paperwork to handover?
 20 **A. Well there would be in normal circumstances but for the**
 21 **convoy all movements under a military convoy don't**
 22 **require the vehicles to be checked because they've**
 23 **already been checked. Escort vehicles we don't normally**
 24 **stop the convoy until we need to basically at the**
 25 **destination, they have arrived.**

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1 Q. So once the convoy is moving it is not anticipated that
 2 it will come to a halt for VCP?
 3 **A. It will not come to a halt for control --**
 4 Q. It will not?
 5 **A. No.**
 6 Q. So it will positively keep on driving?
 7 **A. Yes, it would have to make a stop at the stop sign at**
 8 **the checkpoint but then it would just drive through.**
 9 Q. And was there any procedure for delays on vehicle to do
 10 anything particularly at that checkpoint?
 11 **A. Any? Sorry?**
 12 Q. For the liaison vehicle, do you have instructions for
 13 the liaison vehicle?
 14 **A. Yes, any vehicle arriving at a checkpoint at night,**
 15 **especially under cover of darkness, would obviously stop**
 16 **their vehicle and turn on the internal light inside to**
 17 **allow the guard to identify them.**
 18 Q. Can I turn now to the guards, the civilian guards. Is
 19 guards the right term for them?
 20 **A. Yes.**
 21 Q. Because what exactly was their role in terms of guarding
 22 the site?
 23 **A. Their role?**
 24 Q. What was their specific roles?
 25 **A. Access control duties, patrols, that's security patrols,**

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1 **fire detection patrols.**
 2 Q. Was there any expectation that they would physically
 3 engage with any intruder?
 4 **A. Not an armed intruder, no, but if it was just a criminal**
 5 **they have the legal rights to detain someone.**
 6 Q. But an armed intruder, did they have specific
 7 instructions about what to do with an armed intruder?
 8 **A. Yes, they did. It was to set off the security alarm and**
 9 **then lock down basically as we all do.**
 10 Q. So there was no expectation that they would do anything
 11 to tackle someone who had arms?
 12 **A. No, if I can just go back a little bit. Basically if**
 13 **this alert, we're aware of this alert from a distance we**
 14 **would close the chicane I explained earlier, we would**
 15 **lock off the chicane to stop any vehicle movements into**
 16 **the base. We would then lock off all the pedestrian**
 17 **gates, so secure the base basically. That's what we**
 18 **would do first. The security alarm, then these actions**
 19 **and then they would retire to the guardhouse basically.**
 20 Q. Understandably one wouldn't expect unarmed men to face
 21 armed men?
 22 **A. No. Continued CCTV surveillance but that would be the**
 23 **maximum we would expect of them.**
 24 Q. What training was provided to the guards?
 25 **A. They received a full British Standard 7499 static guard**

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1 **and mobile guard training on site.**
 2 Q. And just to give us an idea of what that standard
 3 represents, if it is a British Standard so obviously it
 4 must be used at times in Britain?
 5 **A. It is used on all industrial sites. All security you**
 6 **see in England they are all trained to BS 7499.**
 7 Q. Was there anything in addition and above that training
 8 in the sense that those trained to monitor access
 9 control and search bags in Britain are obviously not as
 10 much as in Algeria on alert for armed attack or
 11 terrorism. Is there additional in the training for the
 12 Algerian guards or is it just the British Standard being
 13 met?
 14 **A. The British Standard was the fundamental of the five day**
 15 **course that we gave them but obviously when we are going**
 16 **through search procedures et cetera we had to go into**
 17 **fine detail.**
 18 Q. When guards were employed was there any vetting of them?
 19 **A. Yes. All guards are vetted by the Gendarmerie Nationale**
 20 **or should I say -- all the vetting takes place at**
 21 **In Amenas but all the dossiers are sent to the Wali of**
 22 **Illizi's office basically.**
 23 Q. Do you know what the vetting consisted of?
 24 **A. Yes, background, criminal checks that type of ...**
 25 Q. And the same question about the driving. What about

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1 vetting of the drivers, was there any vetting done?
 2 **A. Every national who works at In Amenas goes through the**
 3 **same vetting procedure through the Gendarmes.**
 4 Q. So it is a criminal background check?
 5 **A. Yes.**
 6 Q. Anything beyond that?
 7 **A. Yes, terrorist links, everything would go. We don't see**
 8 **the results of this vetting. The guys are just approved**
 9 **to work in In Amenas basically.**
 10 Q. There has been some speculation in internet articles
 11 that there was some connection between the company who
 12 provided the drivers and a known terrorist. First of
 13 all, were you aware of that speculation?
 14 **A. No, no I wasn't aware of that until after the event.**
 15 **I think if I could go on to say that most of the Tuaregs**
 16 **are related in some way. They are a great, an enormous**
 17 **family basically that stretches the whole Sahel region.**
 18 **So you have cousins that live in Libya, some in Mali and**
 19 **they are all related. So possibly there may be a link**
 20 **I don't know.**
 21 Q. When you say that does that mean that you are
 22 speculating that there is truth in the speculations?
 23 **A. I'm just saying that they are all very, very -- a tight**
 24 **community.**
 25 Q. In the Statoil report, if I can just turn it up, you may

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1 not need to have this in front of you for this, if you
 2 do please ask. In the Statoil report -- is that
 3 a document you have read?
 4 **A. Yes, I read it a while back I am afraid.**
 5 Q. One of the statements made in that report is that those
 6 authors concluded that the Algerian military were not
 7 able to detect or prevent this attack. Is that
 8 something you would agree with?
 9 **A. No, no I wouldn't agree with that. To detect?**
 10 Q. To detect or prevent the attack.
 11 **A. No, I wouldn't agree with that at all. Obviously they**
 12 **didn't detect or prevent the attack but they had the**
 13 **equipment and the manpower to do so.**
 14 Q. You have expressed the view that you were aware the
 15 border was porous?
 16 **A. Yes.**
 17 Q. That the military zone was porous.
 18 **A. Well I wouldn't -- the military zone from the border to**
 19 **within, I don't know, 35 kilometres to In Amenas, it's**
 20 **an out of bounds area for us so we've never been in**
 21 **there to see what sort of presence the military have.**
 22 **But the FCO also made the comment about the border being**
 23 **very porous. It is a known fact. It is enormous.**
 24 Q. If it is your view that the military were able to do it
 25 but they self-evidently didn't, are you able to help us

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<p>1 with how that came about? How it was that people with 2 the capacity, as you think, to prevent or detect or 3 prevent the attack failed to do so? 4 A. It would only be pure speculation but I think closer to 5 home, closer to In Amenas, the project, I think the 6 questions we need to ask are: did the QRF respond? Did 7 they respond? What happened to the night patrol? Were 8 they involved in the ambush on the bus? These are 9 questions that need to be, I think, asked. 10 Q. But of course that is the Gendarmes not the military? 11 A. That is the Gendarmes, yes. For the military we can't 12 speculate, why, how they got through the desert. 13 Q. But it is right, isn't it, that it wasn't beyond 14 contemplation that people could get through those ones? 15 A. No. 16 Q. Would you agree that the physical security at the site 17 once you get to the gates of the site was not actually 18 built with in mind preventing people getting in the 19 gate? 20 A. The gate? 21 Q. Yes. 22 A. Well, the physical security upgrade that was ongoing at 23 the time wasn't actually finished, would have slowed 24 down, if procedures had been followed, would have slowed 25 down the vehicles. The chicane would have been closed Page 169</p>	<p>1 Q. Therefore, would locking a gate, locking that gate have 2 prevented somebody getting through it? 3 A. It may give us some time. I don't know. I wasn't there 4 at the time but ... 5 Q. Was any consideration given before these events to 6 having the Gendarmes at the gate? 7 A. No, the Gendarmes wouldn't -- they wouldn't use the 8 guard towers, so their attitude was, and their decision 9 was to carry out 24 hour patrols of the area. 10 Q. You say they wouldn't. Had they been asked to consider 11 having an armed Gendarme at the gate? 12 A. Yes, we had asked, but this had gone back many, many 13 years and the decision was no, we're not responsible for 14 the access control because that affected what it would 15 be, it would be the military, the Gendarmes carrying out 16 access control into our own base. 17 Q. What one might envisage is that the civilian guards 18 would still do their job of access control but there 19 would be the protection of an armed Gendarme at the gate 20 in the event of the threats which you and your 21 colleagues have identified exists which is of armed 22 assault on the complex? 23 A. Mmm. 24 Q. So the objection that that would require the Gendarmes 25 to do access control surely doesn't hold true? Page 171</p>
<p>1 or should have been closed. The gate should have been 2 closed which would give time for the QRF to intervene. 3 Q. Was the scenario of a group of attackers actually 4 reaching the gate something that was considered? 5 A. Oh yes. 6 Q. In your security? 7 A. Yes, and inside the camp as well. 8 Q. And what was then the procedure once somebody reaches 9 the gate, what was the security procedures that you 10 should have had? 11 A. Once the gate is closed? Is to stop or to attempt to 12 slow down the aggressor or the terrorist at this point 13 and to allow time for the military to intervene or the 14 Gendarmes in this case. 15 Q. They arrive at the gate, they have arrived at the gate. 16 A. Yes. 17 Q. What are the procedures now that are going to prevent 18 them coming through and -- 19 A. Once the gates are locked and everyone is locked down we 20 rely totally 100 per cent on the Gendarmerie to protect 21 us. 22 Q. And what we have seen and with your help identified is 23 that this sliding gate appears to be off its runners and 24 out of location? 25 A. Mmm. Page 170</p>	<p>1 A. They would have carried out access control, verified -- 2 inspected every vehicle, verified every identity of 3 every person who would be entering that base and 4 leaving. Else it would be pointless putting them there 5 basically. 6 Q. And you are suggesting this was a proposal that was put 7 to the Gendarmes? 8 A. Yes, it was a proposal. At one time we did have 9 military inside the camp during the construction phase. 10 We had 35 military troops inside the camp but they 11 refused categorically to put anyone external. 12 Q. And when was that request made to them? 13 A. That happened during the construction phase so between 14 2004 and 2006. 15 Q. And after 2006 was there any request made to the 16 Gendarmes to put armed Gendarmes for protection? 17 A. No. 18 Q. I think you received handover notes from Paul Morgan -- 19 A. Yes. 20 Q. -- as your back-to-back and information. In the last 21 set of handover notes he provided to you were you given 22 any indication by him that he intended to leave his 23 post? 24 A. No, I didn't. I was surprised when I heard that. 25 Q. And in those handover notes was there anything that Page 172</p>

<p>1 Paul Morgan relayed to you which gave you any concerns 2 about security or security issues that had arisen whilst 3 you were off shift?</p> <p>4 A. He mentioned earlier an incident at Ourgla, where there 5 was a civilian demonstration and the police had subdued 6 them basically in Ourgla and that was a serious 7 situation. He also informed me about a meeting which 8 had been held in Ghadames with the Prime Minister of 9 Algeria, Tunisia and Libya but he never said 10 specifically there was any problems at Tigantourine. In 11 fact he actually said there were no security issues at 12 Tigantourine.</p> <p>13 Q. Just returning to when ASI took over the security and 14 there were changes. Is it right as -- you described the 15 general slipshod behaviour around the gate. We have 16 seen in the documents two particular incidents and 17 I wonder whether you can tell us about those. One of 18 those incidents is there is a suggestion that at some 19 point some armed Gendarmes entered the IBO. Do you know 20 anything about that?</p> <p>21 A. No, I don't, no. I also heard this as well. What 22 I suspect it is it is not armed Gendarmes but it may 23 have been the Douane, the customs officials who actually 24 work at the CPF and there are times when we were 25 managing the security team, the civilian guards, that we</p> <p style="text-align: center;">Page 173</p>	<p>1 a dangerous situation because it was -- the gendarmes 2 had escorted them from VCP1 into the base.</p> <p>3 Q. It was a controlled choice?</p> <p>4 A. It was a controlled visit, a visit of the drivers who 5 were on hunger strike.</p> <p>6 Q. Finally, can I just turn to the events on the day, the 7 16th, because I think at the time you were waiting to 8 come out to switch with Paul Morgan and you were at 9 Gatwick.</p> <p>10 A. Yes.</p> <p>11 Q. How did you first learn of the events?</p> <p>12 A. Barry Shaw, the BP security manager received a phone 13 call and informed me immediately while we were in the 14 departure lounge.</p> <p>15 Q. So you were with him?</p> <p>16 A. Yes.</p> <p>17 Q. In the departure lounge. And I think there came a time 18 when you got some communication from Yann Desyeux?</p> <p>19 A. Yes, well I called Yann because obviously as soon as 20 Barry had told me that basically there was a serious 21 incident at In Amenas and the bus, the convoy, had been 22 ambushed I called Paul immediately. I called the OLS 23 telephone, mobile phone.</p> <p>24 Q. And do you know what time this was?</p> <p>25 A. I can't remember exactly, I don't know, it must have</p> <p style="text-align: center;">Page 175</p>
<p>1 had to intervene at their guardhouse because basically 2 the guards had stopped customs officials who work at the 3 site to control the exportation of, the amount of fluids 4 that have been exported et cetera and new people didn't 5 know our procedures, new customs officials had arrived 6 during the night and had gone down there with pistols 7 and were refused entry basically.</p> <p>8 Q. Do the Douane normally carry arms?</p> <p>9 A. Yes, they do.</p> <p>10 Q. Do you have positive information this was Douane?</p> <p>11 A. No, I haven't spoken to anyone about it, no.</p> <p>12 Q. But that wasn't when you were on duty?</p> <p>13 A. No, no.</p> <p>14 Q. And there was also a suggestion that guards allowed 15 families of some of the striking drivers to enter and 16 that would be in contravention of the rules. Are you 17 aware of that?</p> <p>18 A. Yes, it was a contravention of the rules. Paul was in 19 country at the time and basically when we investigated 20 it, it was these civilians didn't enter the base on 21 their own. They were actually escorted by the Captain, 22 Hocine. He escorted them from VCP1 basically, himself 23 personally and the Chef de Securite Militaire from 24 In Amenas. So although it was, as far as we were 25 concerned we weren't informed of it, it wasn't</p> <p style="text-align: center;">Page 174</p>	<p>1 been before boarding and we usually board at 6 o'clock. 2 This was maybe 5.45, 5.50, something like that. So 3 quite rapid.</p> <p>4 Q. So you called the telephone?</p> <p>5 A. I called the telephone and Yann Desyeux was on the other 6 end basically. Then I realised that Paul must have 7 handed his equipment to Yann before he left for the 8 airport.</p> <p>9 Q. And what did Yann Desyeux say to you?</p> <p>10 A. It was very difficult. It was very bad reception and 11 Yann was trying to speak in English. His English is 12 broken so I was trying to speak to him in French and 13 basically he said that yes, the bus had been ambushed 14 and that he was in his room.</p> <p>15 Q. And his room meant, do you understand what that meant?</p> <p>16 A. I thought he was in his room, his bedroom but he 17 obviously wasn't. He was in his office.</p> <p>18 Q. What now makes you now say he was in his office?</p> <p>19 A. Just because he would have been in his office because he 20 would have been at the main gate to see off the convoy 21 at 5.30. That's part of the role of the OLC. He would 22 have checked everyone getting on to the bus. He would 23 check the manifest to ensure that everyone leaving, 24 departing, would have been on that bus. So he would 25 have been at the main gate.</p> <p style="text-align: center;">Page 176</p>

1 Q. And you say Yann told you about an attack on the convoy?
 2 **A. Yes.**
 3 Q. Did he say anything else about events at the BdV?
 4 **A. No, he didn't. You know, I've gone through this**
 5 **thousands of times and I get the impression he was**
 6 **trying to tell me he was already a hostage but I can't**
 7 **be sure.**
 8 Q. Just what gave you that impression?
 9 **A. I don't know. It was the way he was talking to me**
 10 **basically.**
 11 Q. But he didn't pass on any other information about what
 12 was occurring at the BdV at that point?
 13 **A. No, no.**
 14 Q. I think you had a call from Alan McLeod later?
 15 **A. Yes, yes.**
 16 Q. Again, do you know how long after the call to Yann the
 17 call from Alan McLeod was?
 18 **A. No, I can't recall actually. It is in my statement but**
 19 **I didn't have a chance to read it during the lunch**
 20 **break.**
 21 Q. You don't give a time there either so it is not a memory
 22 test.
 23 **A. It must have been an hour later maybe or something, or**
 24 **maybe --**
 25 Q. And he again informed you that the place was under

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1 attack and that he was locked down in his cabin?
 2 **A. Yes.**
 3 Q. Just one matter I forgot to ask you about. We heard
 4 Darren Matthews this morning, I think you were here,
 5 talking about seeing a couple of flares as he described
 6 them. Was there any part of the security procedure that
 7 involved people sending up flares as warnings?
 8 **A. No.**
 9 MS DOLAN: Thank you, I have no more questions for you.
 10 Others will have.
 11 Questions from MR RITCHIE
 12 MR RITCHIE: Mr Fitzpatrick, I represent the family of
 13 Carlos Estrada. In your evidence to Ms Dolan you have
 14 made it clear that you held a well recognised
 15 understanding that there was a risk of attack by
 16 terrorists on the facility.
 17 **A. There was a risk within Algeria itself of possible**
 18 **attack by terrorists.**
 19 Q. But also at the facility?
 20 **A. No one can speculate where the terrorists are going to**
 21 **mount an attack. It is possible throughout Algeria.**
 22 Q. So --
 23 THE CORONER: You are just being asked, the risk included
 24 the facility itself?
 25 **A. Yes.**

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1 MR RITCHIE: At the facility. Can I take you to the
 2 security management plan which is in the core bundle
 3 part 1 at tab 11.
 4 MS DOLAN: It is the green bundle.
 5 **A. Yes.**
 6 MR RITCHIE: This was the plan under which you and liaison
 7 had to operate, wasn't it?
 8 **A. Yes.**
 9 Q. And you and your superiors had input into this plan,
 10 didn't you?
 11 **A. That's correct.**
 12 Q. At page 93 of that bundle security, liaison's
 13 understanding, is set out clearly, isn't it?
 14 **A. Mmm.**
 15 Q. So the second paragraph, the second line midway:
 16 "The JV BP and liaison agree that the risks
 17 associated with potential terrorist attacks cannot be
 18 undermined or discounted."
 19 That is a general approach that you took And
 20 a little further down you summarise in the third
 21 paragraph a little of what you have told us today, that
 22 the GSPC Algerian terrorist group allied itself with
 23 Al Qaeda in September 2006, almost your words from your
 24 evidence this morning?
 25 **A. Mmm.**

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1 Q. I was wondering at that stage whether --
 2 **A. No, I didn't write it.**
 3 Q. -- you wrote those words but this matches your
 4 understanding, doesn't it, Mr Fitzpatrick?
 5 **A. Yes.**
 6 Q. To form Al Qaeda in the Islamic Maghreb, a terrorist
 7 organisation, and the alliance has led to the AQIM
 8 attacking and targeting western and national interests
 9 in all countries in the Maghreb region. And southern
 10 Algeria is within the Maghreb region, isn't it?
 11 **A. Yes.**
 12 Q. Just dropping down another paragraph of this document --
 13 this document explains that there has been longstanding
 14 international concern that the central Sahara region,
 15 the Sahel region, acts as a safe haven and a base for
 16 terrorists and that was the understanding within the
 17 liaison team and the JV, wasn't it?
 18 **A. That was the understanding of the FCO as well and the US**
 19 **embassy.**
 20 Q. By the time in the spring of 2012 that terrorist groups
 21 had ousted the Malian government that was a call for the
 22 safe haven, wasn't it, Northern Mali, and that was well
 23 known within the JV and liaison. And that safe haven
 24 was fuelled, as it is set out here, by weapons from the
 25 fall of the Libyan regime. A flow of illegal weapons

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<p>1 into the Sahel region is expressly set out in that 2 paragraph?</p> <p>3 A. Mmm.</p> <p>4 Q. And you set out further there in the last line of that 5 paragraph the Tuareg uprising the takeover of Northern 6 Mali and that it has destabilised the whole area which 7 borders southern Algeria. This was a big change in risk 8 profile from the bloody war in the 90s, wasn't it?</p> <p>9 A. Well, the bloody war in the 90s was worse. 200,000 10 people were killed.</p> <p>11 Q. I am not saying better or worse, all death is bad, but 12 it was a change in the risk in that the bloody war in 13 the 90s was focused in a different way from the AQIM 14 risk?</p> <p>15 A. The AQIM risk started in 2006 with the bombing of the 16 United Nations buildings and the Algerian parliament.</p> <p>17 Q. I can see that and it was part of the AQIM modus 18 operandi to attack government. What was wider than that 19 was their allegiance to Al Qaeda?</p> <p>20 A. Yes.</p> <p>21 Q. And it was different in that they had found their safe 22 haven in Northern Mali which they had not had before. 23 So it was a changed risk, wasn't it?</p> <p>24 A. Mmm.</p> <p>25 Q. In the next paragraph, three and a half lines down the Page 181</p>	<p>1 A. That's correct.</p> <p>2 Q. And also the third bullet point, the expansive southern 3 desert largely uninhabited ranging from the project 4 sites down to the southern borders despite significant 5 differences from project sites this area is extremely 6 difficult to control outside of the main towns. You 7 agreed with that comment I assume?</p> <p>8 A. Yes, I agree.</p> <p>9 Q. And that matches the very fair evidence that you have 10 given to Her Majesty's Coroner about the porous nature 11 of very large borders in the Sahara unless you put 12 a wall along them or electronic surveillance. One 13 cannot suggest that they will keep out all those that 14 want to come across, they just can't, can they?</p> <p>15 A. No, they can't.</p> <p>16 Q. And indeed, it applies equally to the military zone, not 17 the site zone, the military zone where do what they can 18 they can't guarantee that there won't be terrorists in 19 4 by 4s transporting guns or going about their business. 20 It just can't be guaranteed, can it?</p> <p>21 A. There are ongoing intercepts as we speak. Every week 22 it's happening, yes.</p> <p>23 Q. So in a way it doesn't matter how many troops you stick 24 down there, how many roadblocks you put on the tarmac, 25 you just can't patrol all the desert, can you, it is not Page 183</p>
<p>1 JV and yourself your team have written: 2 "Despite the geographical distances from the project 3 sites the March 2012..." 4 I think that is Tamanrassat?</p> <p>5 A. Tamanrassat, yes.</p> <p>6 Q. And then: 7 "The June 2012 suicide bombings against the 8 Gendarmerie HQs in the southern Algerian cities of 9 Tamanrassat and Ourgla indicates the potential for an 10 escalation of terrorist activity in Southern Algeria." 11 So there was a recognised understanding that there 12 was a longish arm to their reach? That is a nod for the 13 tape, isn't it?</p> <p>14 A. Sorry, yes.</p> <p>15 Q. So it is on record. And then coming down to the key 16 risks, and this matches other documents I will take you 17 to very briefly, it sets out here the major security 18 threats identified, a terrorist attack number 1 and then 19 others underneath. So again you set out in this 20 document the credible recognised risks that you faced. 21 And also contributing factors are set out over the 22 page. If you just turn to 94. The first, the 23 relatively isolated location. This, the In Amenas site 24 and the In Salah sites are not in towns, are they, they 25 are out of towns? Page 182</p>	<p>1 possible?</p> <p>2 A. (The witness nodded)</p> <p>3 Q. You are nodding for the tape?</p> <p>4 A. Sorry.</p> <p>5 Q. So it is part of the record. And you recognise that in 6 your professional capacity by the instructions you gave 7 to the security personnel that you trained from 2006 or 8 7 onwards when the plant was in production?</p> <p>9 A. Mmm.</p> <p>10 Q. And you have seen that because Ms Dolan has taken you to 11 it but it is right that I just point it out again. The 12 same bundle you are in. It is tab 9 and it is the 13 English translation of the document that you mentioned 14 earlier on that is usually in French. Page 48. You 15 specifically set out foreseeable threat risks from 16 forced entry by terrorists, camouflaged entry and the 17 like in that document and you trained your civil guards 18 about that, didn't you?</p> <p>19 A. Yes.</p> <p>20 Q. There is a chronology of risks and warnings that were 21 carefully recorded by BP in an orange file which you 22 will have to your right. You won't have seen it before, 23 but could you just take that for a second. If you look 24 at the front of it there is a document called 25 "Chronology" right at the front of that orange file. Do Page 184</p>

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<p>1 you have that?</p> <p>2 A. Yes.</p> <p>3 Q. I am not going to go through each of these but I am just</p> <p>4 going to identify a couple that I think you were well</p> <p>5 aware of. Firstly, you got the weekly summary of risks</p> <p>6 from BP, didn't you?</p> <p>7 A. Yes.</p> <p>8 Q. Did you also get or take part in reading the liaison</p> <p>9 weekly meeting minutes?</p> <p>10 A. You mean In Amenas?</p> <p>11 Q. We have been provided with them by Mr Johnston and they</p> <p>12 are called liaison weekly meeting update, I think?</p> <p>13 A. They're generated by Paul and myself.</p> <p>14 Q. Fine. And then there is also some liaison monthly</p> <p>15 situation reports. Were you involved in those at all?</p> <p>16 A. Yes, we added, we contribute to generating this</p> <p>17 document.</p> <p>18 Q. So where in this file we have copies of any of those</p> <p>19 documents you were involved either in the production or</p> <p>20 you saw those documents. Running through this</p> <p>21 chronology very briefly with you we see that there are</p> <p>22 a number of registered attacks on oil and gas industry</p> <p>23 installations on the global terrorism database. Do you</p> <p>24 know of the global terrorism database?</p> <p>25 A. No.</p> <p style="text-align: center;">Page 185</p>	<p>1 Q. That the MUJAO was set up in the autumn of 2011, the</p> <p>2 Movement for Monotheism and Jihad in West Africa, you</p> <p>3 were aware of that emergence, weren't you?</p> <p>4 A. Yes.</p> <p>5 Q. And that Mokhtar Belmokhtar had benefited from buying</p> <p>6 weapons in what could be described as the secondhand</p> <p>7 weapons shop next door to your facility, Libya?</p> <p>8 A. Yes, I don't know where he got his weapons from but it</p> <p>9 is probably --</p> <p>10 Q. But he was reported buying them there?</p> <p>11 A. It was probable. I know it is in reports about</p> <p>12 Belmokhtar buying weapons over there.</p> <p>13 THE CORONER: Mr Ritchie, could I say I don't mind, because</p> <p>14 you can use your time, but you said a couple. We have</p> <p>15 done seven of these and I am certainly very familiar</p> <p>16 with these but if you want to use your time to go</p> <p>17 through all these, which we have done then that is your</p> <p>18 choice but I don't know how helpful it is going to be.</p> <p>19 There may be a global question you could crisply put</p> <p>20 that would encapsulate all the material that we have</p> <p>21 already gone through.</p> <p>22 MR RITCHIE: I am going to follow your guidance precisely on</p> <p>23 that, sir. I am very grateful for it.</p> <p>24 I am going to leave that chronology and go to the</p> <p>25 overall questions. So you were aware of regional</p> <p style="text-align: center;">Page 187</p>
<p>1 Q. And that there were regular kidnappings of expats in</p> <p>2 Algeria and that region over the four years up</p> <p>3 to December 2012. 43 being recorded in the Statoi</p> <p>4 report and a few being recorded in your minutes. Were</p> <p>5 you aware of kidnapping of expats in Algeria?</p> <p>6 A. Yes, yes, but not 43.</p> <p>7 Q. This you guarded against, didn't you?</p> <p>8 A. But not 43 expats. I have never seen that number.</p> <p>9 Q. That was wider than just Algeria as was pointed out by</p> <p>10 my learned friend Mr Popat. You were aware in 2012 of</p> <p>11 the fall of the Libyan regime, of course. Look over the</p> <p>12 page. Were you aware, it is not in your documents of</p> <p>13 course, BP documents, were you aware that in southern</p> <p>14 Tunis a military helicopter was attacked by SAM rockets</p> <p>15 fired from a large convoy and In Amenas airport was shut</p> <p>16 down in response in the spring of 2011?</p> <p>17 A. No, I wasn't aware of that.</p> <p>18 Q. It is not in the BP minutes so that would match you not</p> <p>19 knowing that.</p> <p>20 And then in late spring or early summer the Algerian</p> <p>21 government started to reinforce security around the</p> <p>22 Algerian oil and gas facilities with 24 hour desert</p> <p>23 patrols. That is in the weekly liaison minutes so you</p> <p>24 would have been aware of that?</p> <p>25 A. Mmm.</p> <p style="text-align: center;">Page 186</p>	<p>1 terrorism that affected your area, weren't you?</p> <p>2 A. Yes, we were.</p> <p>3 Q. And you were aware of arms from Libya fueling that</p> <p>4 terrorism, weren't you?</p> <p>5 A. Yes.</p> <p>6 Q. And you were aware of a safe haven in Mali for</p> <p>7 terrorists, weren't you?</p> <p>8 A. Mmm.</p> <p>9 Q. And you were aware that AQIM were allied with Al Qaeda</p> <p>10 thinking against the West weren't you?</p> <p>11 A. Yes, that was made public in 2006.</p> <p>12 Q. You were aware that there was an attack on Hassi R'Mel</p> <p>13 in the summer of 2012 on the pipeline there?</p> <p>14 A. No, I wasn't.</p> <p>15 Q. I am going to have to dip into that, sir, if you will</p> <p>16 excuse me.</p> <p>17 A. Well, I can't recall at this time.</p> <p>18 Q. Can I take you to tab 29 but the chronology summary of</p> <p>19 tab 29 is this: that in the weekly summary of risks it</p> <p>20 is recorded that the military warned the JV of</p> <p>21 a potential attack at the Hassi R'Mel gas installation</p> <p>22 and the weekly summary of risks also reported increased</p> <p>23 military measures around Hassi R'Mel and the potential</p> <p>24 threat of an attack. That is in the weekly summary of</p> <p>25 risks that are highlighted there. Do you need just</p> <p style="text-align: center;">Page 188</p>

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<p>1 a little chance to look at the yellow bits?</p> <p>2 A. No, I've read through it.</p> <p>3 Q. Thank you. Then the very next tab, the attack takes</p> <p>4 place, tab 30. Armed terrorists attack the Hassi</p> <p>5 R'Mel-Dellys main gas pipeline. And that is in the</p> <p>6 weekly liaison notes. Have I refreshed your memory</p> <p>7 about that?</p> <p>8 A. You haven't I am afraid. I didn't see this. I don't</p> <p>9 know if I was on rotation or not but I missed this one.</p> <p>10 Q. So that is a question better to ask your back-to-back</p> <p>11 which of course we can't but fair enough.</p> <p>12 So you were however aware of attacks on Ourgla and</p> <p>13 Tamanrassat?</p> <p>14 A. Yes, sir.</p> <p>15 Q. And you were aware of many arrests made over the weeks</p> <p>16 and months of terrorists or men transporting guns in</p> <p>17 4 by 4s through the Illizi region often going down to</p> <p>18 the Northern Mali region?</p> <p>19 A. Yes, it's widespread throughout Algeria and it has been</p> <p>20 since I started working out there in 2001.</p> <p>21 Q. And you were also aware of the FCO warnings in 2012 that</p> <p>22 only essential travel should take place, nonessential</p> <p>23 travel should not take place within 50 kilometres of the</p> <p>24 border of Libya?</p> <p>25 A. We applied those procedures as well and we discussed</p> <p style="text-align: center;">Page 189</p>	<p>1 MR RITCHIE: You are not familiar with page 45?</p> <p>2 A. No.</p> <p>3 Q. So you think that may have been produced further up the</p> <p>4 chain at Hassi?</p> <p>5 A. Yes.</p> <p>6 Q. Let us see if you disagree with it.</p> <p>7 "The risk description is attack by</p> <p>8 domestic/international terrorist group or other</p> <p>9 organised groups or individuals against JV facilities</p> <p>10 and/or people."</p> <p>11 That's an adequate description of the sort of risk</p> <p>12 you recognise, is it not?</p> <p>13 A. That's correct.</p> <p>14 Q. "AQIM alignment with AQ global unrest seen as primary</p> <p>15 target against all western interest and the oil</p> <p>16 industry."</p> <p>17 You agree with that, don't you?</p> <p>18 A. Yes, I agree.</p> <p>19 Q. Then:</p> <p>20 "The risk consequence is terrorist attack eg IED,</p> <p>21 [which we know is a bomb, improvised bomb]. Multiple</p> <p>22 fatalities/casualties. Certainly potential for three or</p> <p>23 more fatalities and multiple injuries if an attack</p> <p>24 occurred on one of our offices or central processing</p> <p>25 facilities. An incident would likely consist of</p> <p style="text-align: center;">Page 191</p>
<p>1 this at In Amenas and at Hassi Messaoud.</p> <p>2 Q. And you were also aware of the US warnings about</p> <p>3 potential attacks on oil and gas installations albeit</p> <p>4 they were discounted?</p> <p>5 A. Mmm.</p> <p>6 Q. So can I now come quickly to your action plan, in other</p> <p>7 words, how you are going to deal with those risks. It</p> <p>8 is back to that first core bundle, tab 7. So in your</p> <p>9 green bundle there is a tab numbered 7. Could you turn</p> <p>10 to the last page of that document, the risk management</p> <p>11 procedure, and you will see the JV's risk action plan.</p> <p>12 Do you have the last page, page 45?</p> <p>13 A. Yes.</p> <p>14 Q. It has some green and yellow on it but do you see at the</p> <p>15 top "JV risk action plan"?</p> <p>16 A. Yes.</p> <p>17 Q. And the risk title is "Terrorist attack" and the risk</p> <p>18 owners are liaison and business support. Top left-hand</p> <p>19 side of that page?</p> <p>20 A. Yes.</p> <p>21 Q. Do you see that? So you are not unfamiliar with this</p> <p>22 document. You are familiar with it, aren't you?</p> <p>23 THE CORONER: You haven't even got there yet. You will know</p> <p>24 whether you are familiar with it. It is page 45.</p> <p>25 A. I'm not familiar with this particular document, no.</p> <p style="text-align: center;">Page 190</p>	<p>1 a vehicle bomb or shooting attack of some kind."</p> <p>2 And so that was a recognised risk that you yourself</p> <p>3 had recorded and understood?</p> <p>4 A. Yes, I hadn't seen this but yes, I recognise the threat.</p> <p>5 Q. Higher up, right-hand side, the risk probability is the</p> <p>6 number 5, isn't it? Do you see the number 5, top right?</p> <p>7 A. Mmm.</p> <p>8 Q. If you go back to page 38 you will see that risk</p> <p>9 probability at 5 is explained in words on page 38 as</p> <p>10 "A common occurrence. At least annually". Do you see</p> <p>11 that?</p> <p>12 A. Sorry, what --</p> <p>13 THE CORONER: Just go back to page 38.</p> <p>14 MR RITCHIE: Go to page 38.</p> <p>15 THE CORONER: If you go to the right-hand side of that page</p> <p>16 you will see 5. Do you see?</p> <p>17 A. Yes.</p> <p>18 MR RITCHIE: So you faced a risk of terrorist attack which</p> <p>19 was well recorded, well understood within your</p> <p>20 organisation and something that you needed to mitigate</p> <p>21 against, didn't you? Let us look at the mitigating</p> <p>22 factors. Firstly, bus escort. There are at least 5 if</p> <p>23 not 6 JV vehicles provided to the Gendarmes for them to</p> <p>24 have men with guns in.</p> <p>25 A. Yes, six vehicles.</p> <p style="text-align: center;">Page 192</p>

<p>1 Q. So the bus from the airport to the facility was guarded 2 against potential terrorist attack by men with guns in 3 vehicles. Rig T212, you had Gendarmes living in the 4 perimeter, didn't you? 5 A. Yes, 30 Gendarmes, yes. 6 Q. So those Gendarmes within the perimeter if there was an 7 attack by men with guns in 4 by 4s they were there to 8 defend expats and others weren't they? 9 A. Mmm. 10 Q. Enafor 20, the same deal? 11 A. Yes. 12 Q. 30 -- 27 or 30, within the perimeter. Expats going out 13 into the field past the zone around CPF, once they got 14 past VCP1 or VCP2 they had to have escorts too, didn't 15 they? 16 A. That's correct. 17 Q. That was a mitigating factor, those escorts were 18 provided by the JV; JV vehicles, good Tuareg drivers who 19 knew what they were doing and men with guns in the 20 vehicles? 21 A. That's correct. 22 Q. And that's because there was a recognised risk of attack 23 out in the field past VCP1 and 2 and that was the 24 mitigation against it, wasn't it? Let us look at BdV, 25 there were no armed guards in BdV, were there? Page 193</p>	<p>1 Q. And there was an alarm at BdV specifically for armed 2 attack or terrorist attack or bombs or the like. It was 3 the intermittent alarm? 4 A. That's correct. 5 Q. And yet at the front entrance there was a sliding gate 6 made of wire. Not fortified and that worried you, 7 didn't it and you asked for a better one? 8 A. Yes, we did, yes. 9 Q. Let's go to that document to see how long it took to get 10 that better one. It is 11, tab 11 and we are at 11 page 100. It is the green one again. 12 A. Okay. 13 Q. This is a table. Page 100. Flip it round. In the 14 middle entry/exit points on the left-hand side. Do you 15 see that? 16 A. Mmm. 17 Q. And then to the right third column, third paragraph 18 down: 19 "Install motorized vehicle sliding gate on all main 20 entrances". 21 I understood your evidence to be that it was 22 a fortified motorized gate? 23 A. It is. 24 Q. A good substantial one perhaps like the one at REB? 25 A. I haven't seen the one at REB but it would -- Page 195</p>
<p>1 A. No. 2 Q. There were no armed guards living there, were there, and 3 there were no armed guards stationed there at the front 4 entrance or any entrance? 5 A. No, they were in their own base. 6 Q. They were not stationed at BdV? 7 A. No. 8 Q. And there were none patrolling between the inner and 9 outer fence? 10 A. No. 11 Q. They could because that was wide enough to take 12 a vehicle? 13 A. Yes, it was. 14 Q. Perhaps two vehicles side by side. There is a big gap 15 between those two fences, isn't there? 16 A. Mmm. 17 Q. But there were none patrolling in between those two 18 fencings. There were concrete T bars placed outside 19 specifically to guard against attack by men in vehicles? 20 A. Yes, a ramming attack. 21 Q. It wouldn't stop men on foot? 22 A. It is to stop ramming vehicles. 23 Q. Because they were to stop vehicles smashing into the 24 fences, weren't they? 25 A. Yes. Page 194</p>	<p>1 Q. Crash proof, can I call it that? 2 A. Yes. 3 Q. And it looks as if March 2011 may have been the time 4 that was requested because it says "new access control 5 cabin at main BdV completed. Some punch list items 6 outstanding", and you thought that might have been the 7 genesis of it. Did I understand that to be your 8 evidence? 9 A. I thought so but I can't be sure on this. 10 Q. But we know that by July 2011 there was a red saying 11 nothing has happened and red means something should be 12 done and hasn't been done? 13 A. The gates were I believe ordered but obviously -- 14 Q. But help Her Majesty's Coroner with this. If you have 15 a red entry that means something should have been done 16 and hasn't and it is in red to make people think hang 17 about, something has not been done? 18 A. Yes, it is to highlight the fact that it hasn't been 19 done. 20 Q. If it is in black everything is fine and dandy, 21 zippadeede, but if it is in red it is hang about you 22 lot up there, wake up and do something. And 23 by July 2011 we have a red and in June 2012 a red and 24 then in December 2012 a red. They had delayed that 25 probably by more than a year, those security gates? Page 196</p>

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1 **A. Just, we need to go back and exactly find out the date**
 2 **when this was requested.**
 3 Q. But doing the best you can. From your interpretation of
 4 this document I am not unfair to say red means something
 5 outstanding, am I?
 6 **A. Yes.**
 7 Q. So crash proof gates not installed. That is machine
 8 operated crash proof gates and then when we come to the
 9 fencing, the double fencing, if you look further up the
 10 page forever, for more than five years there had been
 11 a request to put concrete anchors on the fencing, so you
 12 couldn't squeeze under them or crash through them with
 13 a car and it had never been installed. Waiting and
 14 waiting and waiting, five years, never installed. Those
 15 concrete bases to all the perimeter fences?
 16 **A. Mmm.**
 17 Q. BdV wasn't designed to prevent forced terrorist attack
 18 once they got to the gate, was it?
 19 **A. That's why we requested a physical security upgrade.**
 20 Q. And they didn't put it in?
 21 **A. Because initially it wasn't --**
 22 Q. Mark Cobb told us he was perfectly happy with the
 23 security at the facility?
 24 **A. We were all perfectly happy except there were**
 25 **outstanding issues to resolve.**
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1 Q. Let us look at what happened when the terrorists get to
 2 the front entrance of BdV. If they get there before the
 3 quick reaction force, if they get to the front entrance
 4 of the BdV before the quick reaction force and they are
 5 in the car with car with guns, 4 by 4, they can smash
 6 through that sliding wire gate, can't they?
 7 **A. Yes, it looks like they did.**
 8 Q. Well, actually to be fair it looks like it was open and
 9 they had drove straight through because it doesn't seem
 10 to have been smashed straight through. I will come to
 11 photographs if I may. The photographs are going to be
 12 brought up on the screen and this is taken, as
 13 I understand it, on Sunday after the whole attack and it
 14 is a blow up of the chicane on the way in. Are you with
 15 me?
 16 **A. Yes.**
 17 Q. And it looks like the terrorists weren't that good at
 18 driving because they hit this pole, the first part of
 19 the chicane, do you see that first pole down?
 20 **A. Mmm.**
 21 Q. And then they went straight over a pole on the second
 22 part of the chicane and you see a bit of bumper has been
 23 left there?
 24 **A. Mmm.**
 25 Q. And then they drove straight past the civilian guard hut
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1 and you will see this in the next photo, we can flip
 2 into that, you see a bit more bumper there and then the
 3 sliding gate doesn't appear to be damaged, they seem to
 4 have just gone straight through an open gate?
 5 **A. Mmm.**
 6 Q. If you see in the distance there's a bus, do you see
 7 that?
 8 **A. Yes.**
 9 Q. And that's covering what would be the far gate, the
 10 inner gate and this inner gate is a sliding gate you
 11 have told us?
 12 **A. Yes.**
 13 Q. We had thought that it was a pivoting gate?
 14 **A. No, it's a swinging gate.**
 15 Q. It is a sliding gate?
 16 **A. It is a sliding gate, sorry, yes.**
 17 Q. So if you flip over to the next photograph we see the
 18 bus in front of that what we thought was a pivot gate.
 19 It must have been bashed open because you can see it has
 20 pivoted right off one hinge and gone 90 degrees. So
 21 they probably smashed straight through that, didn't
 22 they?
 23 **A. It looks that way, doesn't it.**
 24 Q. If you look at the oil markings underneath the bus, the
 25 rear of the bus going straight along the ground through
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1 that gate, we are now going to the terrorist's car, the
 2 next photo, there is the terrorist's car with the oil
 3 leaking out of it, and the front damage evident upon it
 4 and if we look at the -- this is one of the Met's
 5 excellent photo sets. It is IA026, page 7. You may
 6 have IA026 somewhere near you, Mr Fitzpatrick. It is
 7 this big thing. Could you turn to page 7 of that?
 8 **A. Okay.**
 9 Q. Do you see the three photos of the terrorist car there
 10 with the oil and the tracks of oil going into the back
 11 of the terrorist car and then the oil at the front of
 12 the terrorist car?
 13 **A. Mmm.**
 14 Q. That ended up at point D, do you see that little red
 15 line going all the way over to point D?
 16 **A. Yes.**
 17 Q. So basically just the other side of that entry gate is
 18 where that terrorist car ended up having smashed through
 19 what looks like the inner gate. Does that all make
 20 sense to you from the photographs?
 21 **A. Yes.**
 22 Q. Can you just me show me where the VIP building is on
 23 page 7? Is it the doughnut with the hole in the middle
 24 just south of the round seating area?
 25 **A. Yes, to the left of T.**
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<p>1 Q. Just so that this is clear to those at the back, the VIP 2 building is just underneath the circle on the screen and 3 we are going to try and put a red circle because we have 4 got hot technology now. Can you put a red circle over 5 the doughnut just south of the plaza circle? The 6 building with the hole in the roof. The VIP building. 7 That is it, isn't it? 8 A. Yes. 9 Q. They didn't have far to go to grab some VIPs did they, 10 Mr Fitzpatrick, they didn't have far to go to grab some 11 VIPs, did they? 12 A. No, they didn't. 13 Q. This idea that the QRF are going to turn up, rock in and 14 shoot some terrorists once they have taken hostages, it 15 doesn't fly, does it? 16 A. I don't understand. 17 Q. Let us assume that these terrorists have taken Carlos 18 Estrada and a couple of other VIPs and they have got 19 guns to their heads. What were you thinking the 20 gendarmes would do that at stage? 21 A. I can't, you know, what the Gendarmes would do, what the 22 Gendarmes wouldn't do, I can't really comment on that. 23 Q. It is not safe for the terrorists to get through into 24 the camp, is it? 25 A. It's not safe for the terrorists?</p> <p style="text-align: center;">Page 201</p>	<p>1 who have to do their access control, a hut for Gendarmes 2 with guns, where would you have put it? 3 A. I would have put it to the -- well opposite the visitor 4 parking area at the entrance to the chicane. 5 Q. So the other side of from where the guard hut is, the 6 other side of the path or the road by the gate? 7 A. Yes, well, I would have put it outside the chicane. 8 Q. Outside the chicane? 9 A. Yes. 10 Q. If you look further down there is the internal gate -- 11 THE CORONER: Outside, you mean further away from the camp? 12 A. Yes, at the entrance to the chicane I would have 13 positioned it. 14 MR RITCHIE: And if you look inside the far side of the car 15 park where the inner gate is we have put "hinged gate to 16 BdV" because that was the evidence that we had then. In 17 fact you told us it's a sliding gate. Pedestrian access 18 gate and guard hut. Is that accurate? Was there the T 19 bar hut there where it says "guard hut"? 20 A. That's correct. 21 Q. Fine. If you had liberty or power to put Gendarmes on 22 the secondary gates where would you have put a hut for 23 them? 24 A. Again, I wouldn't have had the Gendarmes on the access 25 control area here. Is that what you are talking about?</p> <p style="text-align: center;">Page 203</p>
<p>1 Q. To get into the camp. 2 THE CORONER: It is not safe if they get in I think. 3 A. No, it is not safe if they get into the camp. 4 MR RITCHIE: You have got to keep them out, haven't you? 5 A. The best thing would be to try to keep them out yes, 6 obviously. 7 Q. We understand your desire to put in a crash proof gate 8 and concrete on the underside of the fences, but what 9 about putting some Gendarmes with guns at the main 10 entrance. That would be a good idea, wouldn't it? 11 A. That would have been a good idea. 12 Q. Can we bring up Estrada 1, please. 13 A. But I think you need to remember that there was 14 a military protection zone in place 24 hours a day. 15 Q. I have that well in mind. We have blown up the plan of 16 the car park and you can see there in purple chicane 17 crocodile, do you see, that Mr Fitzpatrick? 18 A. Yes. 19 Q. A metal pole barrier, there is one to go up and down and 20 then guard hut in green where the civilian guard was and 21 sliding gate at main entrance. Do you see that? 22 A. Yes. 23 Q. If you had been given liberty, permission to put 24 a Gendarme hut at the main entrance where would you have 25 put it? This is a hut for Gendarmes not for the guards</p> <p style="text-align: center;">Page 202</p>	<p>1 Q. I am asking -- 2 A. Internally. 3 Q. I am asking where would you have put Gendarmes. 4 Assuming the civilian guards do their T cards and all 5 the rest of it but you had liberty to put a second 6 Gendarme hut so if they get through the first Gendarmes, 7 the first gate, where would you put a second Gendarme 8 hut so that they don't get through the second gate? 9 A. Well this is hypothetical obviously. 10 THE CORONER: Are you saying that you wouldn't do that? 11 A. I wouldn't. I wouldn't have -- this area would have to 12 be a military zone if we did this. A military zone with 13 no civilians working within it. So we wouldn't be able 14 to put the guards in there. We wouldn't be able 15 to allow drivers to remain in there. We wouldn't be able 16 to use it as a parking area. So within that area 17 I wouldn't. I would potentially build an additional 18 fence, double perimeter fence on the outside, and have 19 an area controlled by the military which we would have 20 to drive through to get into our compound. 21 MR RITCHIE: Understood. But in your mind then it is vital 22 to keep all military zones separate from all expat or 23 civilian workers et cetera? 24 A. Yes. 25 Q. So you would put a rectangle outside the main gate being</p> <p style="text-align: center;">Page 204</p>

<p>1 a military zone and they can have their huts, their 2 sandbags whatever they want by way of protection? 3 A. I would stick it outside the main gate and we would 4 drive through it basically. 5 Q. Can you just help Her Majesty's Coroner as to why it is 6 so vital to do that compared to Rig T212 where there is 7 a military area, walled off with a berm? 8 A. It is walled off with a berm. 9 Q. But they deal with the entrance to Rig T212 and they 10 occupy the guardhouse there, don't they? 11 A. No, they don't. They occupy the guardhouse? No, the 12 military don't occupy the guardhouse. 13 Q. Assist us with understanding that then. Let us go to 14 Rig T212 and the plan of it so you can explain how it 15 works there. I think you will find that in core bundle 16 3 at tab 7. So for those in the in the back it looks 17 like this. 18 A. Where are we? 19 Q. Is it core 4? Part 3 I have. 20 A. I have got 3 and 4. 21 Q. No, you are absolutely right. Part 4, tab 7. My 22 apologies. Page 639. It has come up on the screen. Do 23 you have that plan? 24 A. Yes. 25 Q. And do you see the perimeter to T212 which seems to have Page 205</p>	<p>1 the camp each even though they actually had a door that 2 could be unlocked and let them into the camp? 3 A. There was no door there. It is just an opening in the 4 berm basically. 5 Q. So they could leave their camp and go into the civilian 6 camp? 7 A. Yes. 8 Q. But generally they were supposed to keep in their camp 9 unless there was some emergency? 10 A. Yes. 11 Q. Why couldn't that apply in BdV? 12 A. It could but, you know, this is all down to the 13 Gendarmes and the way they want to assure the protection 14 of the BdV. 15 Q. Isn't it all down to you and the JOC deciding on how 16 best to protect the expats and then negotiating with the 17 Gendarmes? 18 A. We did, sir. We do. On a regular basis, on a daily 19 basis. 20 Q. At any time after the Gendarmes took over in 2008 did 21 you advise Mark Cobb that there should be Gendarmes at 22 the main entrance to BdV? 23 A. No, I'll go back to what I did say originally. We had 24 a detachment of 35 military within the companies camp. 25 They were based within the companies camp. Once -- and Page 207</p>
<p>1 yellow blobs around it? 2 A. Yes. 3 Q. And you see on the right-hand bottom area, "Militaire"? 4 A. Yes. 5 Q. And we know that that is surrounded by some sort of 6 berm, approximately 2 metres high -- 7 A. It is. 8 Q. -- to separate off the military area and then it says 9 "post de guard", guard post that means, doesn't it? 10 A. Yes, it does. 11 Q. Didn't they occupy that guard post? 12 A. No, they didn't and that guard post is in the wrong 13 location as well. It is actually outside the military 14 berm. On the entrance basically. 15 Q. I see. So you are saying they had their own little area 16 within the perimeter? 17 A. Yes. 18 Q. And were they allowed out of that area? 19 A. Allowed out? They had towers. They had guard towers 20 around the external perimeter which they accessed via 21 the external perimeter. 22 Q. So if anything happened they could shoot on anything 23 that happened at the front gate? 24 A. They had a military tower within the camp. 25 Q. So in your mind that separates them off from the rest of Page 206</p>	<p>1 they insisted that we constructed their own camp for 2 them, 350 metres away from the BdV -- so once we 3 constructed that camp they liberated the camp that was 4 previewed for them in the BdV, in the companies camp, 5 and they all left and when we asked whether we should 6 keep it there for them in case of emergency or they 7 needed it they said "no, we're not moving back into the 8 BdV." So that was told before the Gendarmes arrived. 9 Q. So your understanding of the status quo was you couldn't 10 change that? 11 A. The Gendarmes wouldn't even get in the guard towers. 12 Q. Your understanding of the -- please answer the question. 13 Your understanding of the status quo is you couldn't 14 change that, is that right? 15 A. I know we couldn't change that at the time. 16 Q. And you never tried? 17 A. Yes, of course we tried. 18 Q. When did you ask the Gendarmes to be manning the front 19 gate? 20 A. When? There was the handover between the military and 21 the Gendarmes. 22 Q. In 2008? 23 A. No, it was earlier, it was 20 -- it wasn't 2008. 24 I think the Gendarmes came a little earlier. Well 25 a year. During that handover period between the Page 208</p>

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<p>1 military and the Gendarmes we wanted to know if there 2 was going to be a Gendarme presence within the same 3 camp, in the companies camp, which was a military camp. 4 It was constructed entirely for them and the reply was 5 categoric no. 6 Q. We have that. After that date at any time did you ask 7 the Gendarmes to man the front gate? 8 A. They would -- on one occasion I believe they -- when 9 I wasn't in country they did man the main gate when 10 there was a heightened security risk. 11 Q. You are not answering the question, forgive me. I will 12 just ask it for the third time, now, Mr Fitzpatrick, 13 wholly in sir's hands on how to deal with this: at any 14 time after 2008 did you ask for the Gendarmes to man the 15 front gate? 16 A. No, I did not ask them to man the front gate. I asked 17 them to man the guard towers around the perimeter. 18 Q. I understand. Did that mean pretty much the same, if 19 they were doing the guard towers -- okay. Did you tell 20 Mark Cobb you wanted them to man the guard towers? 21 A. No I wouldn't -- Mark came later, so I don't think I did 22 speak to Mark about it. 23 Q. After Mark Cobb came at any stage did you tell him that 24 you wanted the Gendarmes either to man the front gate or 25 the guard towers?</p> <p style="text-align: center;">Page 209</p>	<p>1 a participant in them? 2 A. No, we weren't, no. 3 Q. So did you observe them from within the perimeter of 4 BdV? 5 A. Yes, we did. 6 Q. Did you observe them from the liaison office? 7 A. From outside the liaison office obviously as we wouldn't 8 see anything. 9 Q. So let's understand these exercises. Firstly, do you 10 know when they got their alert, were you given that 11 information? 12 A. No. 13 Q. Did you have a stop watch to start? 14 A. No. 15 Q. Did you know how long it took for them to muster from 16 their camp to get into their vehicles? 17 A. From my location within the camp the military camp is 18 only 350 metres away so you can basically see them 19 coming out of their cabins which we put in place for 20 them and exiting the camp, so we can watch everything. 21 Q. So you saw some movement in the camp? 22 A. Yes. 23 Q. And then them getting into their vehicles? 24 A. Yes, green and white vehicles. 25 Q. And coming out of their camp?</p> <p style="text-align: center;">Page 211</p>
<p>1 A. I can't remember having that discussion with him, no. 2 Q. Now, let us look then at the quick reaction force. The 3 lives of the expats relied on the quick reaction force, 4 didn't they? 5 A. Well, the lives of the expats, there was a military 6 protection zone that you keep forgetting, there was 7 a military protection zone 24 hours a day in place, 8 mobile patrol which was the first line of defence. The 9 quick reaction force would then intervene normally 10 within ten minutes in case of an attack on the camp. 11 Q. I will come down to what you call the military 12 protection zone. I think you are talking about the 13 Gendarmes area? 14 A. Yes, the CPF area. 15 Q. But QRF were vital to protection of expats, weren't 16 they? 17 A. The QRF, yes. 18 Q. And you say there were 12 in the force? 19 A. Yes. 20 Q. They were able to deploy in ten minutes or so, is what 21 you say in your witness statement and you say that you 22 had understood they carried out exercises? 23 A. Yes, they did carry out -- exercises or drills whatever 24 you would like to call them. 25 Q. And you were not invited to be an observer or</p> <p style="text-align: center;">Page 210</p>	<p>1 A. Yes. 2 Q. And did they come towards BdV? 3 A. Yes, direct. 4 Q. And did they come into BdV? 5 A. No. 6 Q. So all you actually saw was them leaving their camp and 7 then coming around BdV? 8 A. Yes. 9 Q. And that was the effectiveness testing? 10 A. That was a drill, yes. 11 Q. Yes, okay. Do you know, for instance, whether they were 12 giving the information about where the attack was taking 13 place for this effectiveness test? 14 A. Giving the information? 15 Q. Let's say the alarm goes off. How do they know where 16 the attack is? 17 A. Are we talking about how we communicate where the attack 18 is? 19 Q. It is a simple question. 20 THE CORONER: I think you are just being asked and maybe you 21 don't know, when you were watching a drill you see them 22 leaving and so on, whether you knew where in the drill 23 the supposed point of attack was. It maybe you didn't 24 have access to details like that. 25 A. No, we didn't have access to details.</p> <p style="text-align: center;">Page 212</p>

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1 MR RITCHIE: I will move on then, sir. Let us look at the
 2 QRF. The QRF's effectiveness depends wholly on them
 3 being alerted, doesn't it?
 4 **A. Mmm.**
 5 Q. And there are methods of alert that were available at
 6 BdV. One was the security alarm going off --
 7 **A. Hmm.**
 8 Q. -- which they would hear because it would go off in
 9 their base?
 10 **A. Yes, that's correct.**
 11 Q. If that went off they wouldn't know where the incident
 12 was taking place without more, would they?
 13 **A. No.**
 14 Q. There are 12 of them so the best they could do is send 6
 15 to the CPF and 6 to the BdV?
 16 **A. No, because we would immediately communicate via radio.**
 17 Q. You would have but if it is only the alarm and they get
 18 no more they wouldn't know where to go, would they?
 19 **A. No, they would prepare.**
 20 Q. So the best they could do would be half BdV and half
 21 CPF?
 22 **A. Again, I can't comment on what is best for them to do.**
 23 Q. You are a security expert so what is the best they could
 24 do?
 25 **A. They wouldn't move until they got the location.**

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1 Q. So they wouldn't move at all. If it was the alarm going
 2 off they wouldn't move until they got the location?
 3 **A. If the alarm was going off in the BdV they would**
 4 **obviously head off to the BdV.**
 5 Q. Would they know? When the alarm goes off and the alarm
 6 went off in this attack, as I understood it, it had gone
 7 off in both the CPF and the BdV at the same time and
 8 I may be wrong about that but if I am no doubt another
 9 witness will correct me.
 10 **A. Yes, because the CPF wasn't equipped with a security**
 11 **alarm. It was a fire alarm they had down there.**
 12 Q. I am going to come to that later in inadequate security
 13 and slack security but I don't need to deal with that
 14 point now. There was only a fire alarm in the CPF?
 15 **A. The security alarm had been there for three years. It**
 16 **hadn't been installed yet.**
 17 Q. We will come back to that. I am going to try and stick
 18 on this topic. The quick reaction force therefore
 19 needed a radio report in order to understand where to
 20 go.
 21 If that radio report came from La Recule that would
 22 give them quite a lot of time to react, wouldn't it,
 23 a good chance they could get out and deal with it?
 24 **A. Mmm.**
 25 Q. But if it came from VCP1 that would be only half

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1 a kilometres from BdV, wouldn't it?
 2 **A. 1 kilometre.**
 3 Q. 1 kilometre. They would never have got to the gates of
 4 BdV before the terrorists. If the terrorists were
 5 already at VCP1 driving to BdV the terrorists were
 6 always going to get there first, weren't they?
 7 **A. I think you are discounting again the 24 hour protection**
 8 **zone that was in place.**
 9 Q. I am going to come to patrols, please. If the
 10 terrorists get to VCP1 or 2 it is too late, isn't it,
 11 Mr Fitzpatrick?
 12 **A. I couldn't comment on it.**
 13 Q. It is probably too late. Does it take ten minutes to
 14 drive from VCP1 to BdV?
 15 **A. No.**
 16 Q. Let us come to the desert patrols and the effectiveness
 17 of them. The security management plan says that a safe
 18 zone is created by constant patrolling and guarding the
 19 zone. Do you agree with that?
 20 **A. Mmm.**
 21 Q. And the zone around the project is a 20 kilometre
 22 radius, in other words, the pipes go out about
 23 20 kilometres from the facility?
 24 **A. Yes, they stretch further down into the satellite**
 25 **fields.**

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1 Q. Further than 20 kilometres?
 2 **A. Yes.**
 3 Q. So if they are patrolling the whole of that area --
 4 **A. They're not patrolling the whole of that area.**
 5 Q. And we'll come to that. If they were patrolling the
 6 whole of that area that is 1,200 kilometres squared.
 7 That is pretty much the size of London. Now, let us
 8 come to what they actually were doing. Is it your
 9 understanding that at night all they patrolled was
 10 zone 1 which is around CPF and BdV?
 11 **A. Yes, that's my understanding.**
 12 Q. They did not patrol all around the field?
 13 **A. No.**
 14 Q. Could we hold up, please, tab 43 which is this blown up
 15 plan. You have somewhere near you, Mr Fitzpatrick, this
 16 massive photo of the area. If you hold it up so that
 17 Her Majesty's Coroner can see there are some zone
 18 stickers put on that. Zone 1 is CPF/BdV or thereabouts
 19 and then there are zones 2, 3 and 4. Mr Cobb helped us
 20 generally with where they are. Just to make it
 21 absolutely clear only zone 1 to your understanding was
 22 patrolled at night?
 23 **A. Yes.**
 24 Q. So you see these tracks that have been indicated by
 25 various people. Do you see the green track which comes

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<p>1 from the N3 into the facility?</p> <p>2 A. Yes.</p> <p>3 Q. That's the main road in, the tarmac road, isn't it?</p> <p>4 A. This one, yes, it is. That is the permanent access</p> <p>5 road.</p> <p>6 Q. And do you see the falaise which runs south of the</p> <p>7 facility?</p> <p>8 A. Yes.</p> <p>9 Q. And do you see south of the falaise there are falaise</p> <p>10 there are various tracks that run to the N3?</p> <p>11 A. Yes.</p> <p>12 Q. Do you agree there are various tracks which run to the</p> <p>13 N3 south of the falaise?</p> <p>14 A. Yes.</p> <p>15 Q. Do you see a black track running along trunk line 5 from</p> <p>16 the CPF to the east that also eventually ends up at the</p> <p>17 N3, do you see that?</p> <p>18 A. Sorry, say again?</p> <p>19 Q. A black track that runs from the CPF eastwards to the</p> <p>20 right to the N3, do you see that track?</p> <p>21 A. Yes.</p> <p>22 Q. Do you agree that there are -- there is at least one if</p> <p>23 not more tracks, to the north about where that track is</p> <p>24 that runs to the N3?</p> <p>25 A. Yes, there are a number of tracks.</p> <p style="text-align: center;">Page 217</p>	<p>1 vehicles because we did feel it merited it. Our request</p> <p>2 was refused.</p> <p>3 Q. Did you go to the JOC and ask them to put pressure on</p> <p>4 the Gendarmes to do what you asked?</p> <p>5 A. I would have raised this at Hassi Messaoud.</p> <p>6 Q. Did you speak to Mark Cobb about the need for more</p> <p>7 patrols?</p> <p>8 A. No, I don't think I did.</p> <p>9 Q. Isn't your job to advise him on security?</p> <p>10 A. Yes, it is.</p> <p>11 MR RITCHIE: Why didn't you?</p> <p>12 THE CORONER: Sorry, can I just ask, so was it your view</p> <p>13 that five vehicles wasn't really enough to --</p> <p>14 A. No, it wasn't to my view. I think five was adequate</p> <p>15 within the small zone that we were working. Initially,</p> <p>16 I think we offered eight vehicles initially but the</p> <p>17 Gendarme, the captain came back and said "look, we don't</p> <p>18 need eight vehicles to secure this zone. We need five".</p> <p>19 So it went down to five.</p> <p>20 THE CORONER: Did you ever ask them for more vehicles or</p> <p>21 anybody.</p> <p>22 A. Ask them?</p> <p>23 THE CORONER: Or anybody? Did you ever raise the question</p> <p>24 once you were told it was five were you happy with five?</p> <p>25 I just want to understand what you were saying. You are</p> <p style="text-align: center;">Page 219</p>
<p>1 Q. A number.</p> <p>2 A. Yes.</p> <p>3 Q. So terrorists could approach the BdV and CPF on a number</p> <p>4 of desert tracks without ever going through a VCP,</p> <p>5 couldn't they?</p> <p>6 A. Yes, they could.</p> <p>7 Q. And all that was patrolled was the area between VCP1,</p> <p>8 BdV and the CPF?</p> <p>9 A. Yes.</p> <p>10 Q. At night?</p> <p>11 A. As I did explain earlier, it's -- you have to add</p> <p>12 a radius of 2 to 3 kilometres around.</p> <p>13 Q. Fair enough. And there were five vehicles provided by</p> <p>14 the JV --</p> <p>15 A. Yes.</p> <p>16 Q. -- to do that?</p> <p>17 A. Yes, five at night, yes.</p> <p>18 Q. At night.</p> <p>19 A. That was all that the Gendarmes requested, five</p> <p>20 vehicles.</p> <p>21 Q. It wasn't enough, was it?</p> <p>22 A. It's --</p> <p>23 Q. I haven't heard an answer.</p> <p>24 A. No, the answer is it came from the Gendarmes. It was</p> <p>25 a formal request for five vehicles and we did offer more</p> <p style="text-align: center;">Page 218</p>	<p>1 saying that you were happy with five or you thought five</p> <p>2 wasn't really enough?</p> <p>3 A. Initially like I say, we wanted to give them more</p> <p>4 vehicles, more drivers and in the end I think we all</p> <p>5 discussed it and basically five, with the captain</p> <p>6 obviously, and five was what they wanted and I don't</p> <p>7 think they had enough manpower to provide more. Sorry,</p> <p>8 I don't think they had enough troops to provide more.</p> <p>9 THE CORONER: No, all I really want to know is just from</p> <p>10 your perspective, as far as you were concerned did you</p> <p>11 actually think they needed some more vehicles and</p> <p>12 therefore some more manpower to do it properly? Is that</p> <p>13 the what you are saying?</p> <p>14 A. Initially, yes, but towards the end I think five</p> <p>15 vehicles would have been enough in that small zone.</p> <p>16 THE CORONER: Right.</p> <p>17 A. Yes.</p> <p>18 THE CORONER: What changed your mind? So initially you</p> <p>19 thought it wasn't really enough and then you thought it</p> <p>20 was, just so that we are clear.</p> <p>21 A. It's basically now I could see what they were</p> <p>22 patrolling. So they were patrolling in close proximity</p> <p>23 to the CPF zone. They weren't wandering off.</p> <p>24 THE CORONER: Because of the range of what they were doing</p> <p>25 you thought perhaps it was enough.</p> <p style="text-align: center;">Page 220</p>

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<p>1 MR RITCHIE: I thought you told us earlier that you weren't 2 allowed out after curfew? 3 A. No. 4 MR RITCHIE: So you never saw their night patrols? 5 A. Let me explain. If we ever needed to go to the CPF or 6 anyone needed to go then we would get an escort, 7 a military escort vehicle, a Gendarme escort vehicle to 8 take us from the BdV to CPF. This happened, it wasn't 9 routine but it did happen when expats needed to go to 10 the CPF for night work and that time it was then that we 11 would see the military patrol vehicles at that time but 12 yes, normally on a normal day we would be closed down at 13 19.30. 14 Q. So normally -- in fact you did no inspections of the 15 patrols that the military carried out at night. You did 16 no inspections of them? 17 A. Of course we did inspections. 18 Q. You did an inspection of the military night patrol? 19 A. Yes. Not every night obviously. 20 Q. Okay. So how did you carry out that inspection? 21 A. We had a night OLC. A national operations liaison 22 coordinator, an OLA, who would be out working with the 23 patrol all night. That was his job. 24 Q. Was that every night? 25 A. Yes, that was his job. He was the what we called the Page 221</p>	<p>1 Q. It will be recorded. There will be a car allocated to 2 a driver? 3 A. Yes. 4 Q. those five? 5 A. An Ordre de Mission signed -- 6 Q. That information is documented, it is within the JV? 7 A. Yes. So you can gain that from the ASI basically, 8 Sonatrach. 9 Q. How long were you employed here after this event? 10 A. Employed? 11 Q. In the In Amenas plant after this event? 12 A. I left in January 2014. 13 Q. So you were there for a year after the event. Did you 14 actually go back to site at all during that year? 15 A. No, i never went back to site at all, never went back to 16 Algeria. 17 Q. So you haven't been able to find out who was on duty 18 that night? Another one of those mysterious things 19 where no documents get produced. 20 A. I haven't been able to get back to site, no. 21 Q. Can I then move very quickly to security. I have used 22 up I think 40 minutes of my time but I am going to come 23 in within the time estimate, sir. 24 THE CORONER: I have made a note you that started just after 25 3 o'clock, but perhaps time has gone quicker than we all Page 223</p>
<p>1 night OLA operations. 2 Q. Who was that? 3 A. Well it was tour de role. They are all now chef de 4 group but it was in tour de role and every week it would 5 be a different national who would work nights. 6 Q. A national would be going out? 7 A. Yes. 8 Q. In other words, one of the drivers? 9 A. No, one of the team loaders if you like, what they call 10 now a chef de group. 11 Q. And did you keep records of who went out, which nights 12 on patrol? 13 A. It was in a rotation, yes. 14 Q. Who was on patrol on the 15th? 15 A. I wasn't in country on the 15th. I am afraid I don't 16 know. 17 Q. But you have that documentation within the JV available 18 to you? 19 A. No, I don't, no. 20 Q. Are you still working there? 21 A. No. 22 Q. So the JV have that documentation available to them, 23 they know who was a driver on patrol with the Gendarmes 24 that night? 25 A. Yes, the ASI will know exactly. Page 222</p>	<p>1 thought. 2 MR RITCHIE: It is always a pleasure to know that happens 3 thank you very much. 4 Can with I deal then with transfer of responsibility 5 to SSI. I think it was July 2012 you mentioned in your 6 evidence this morning. 7 THE CORONER: Shall I tell you what we might do because 8 I appreciate you have been in the witness box for a long 9 time. If you are just going to turn to a new topic we 10 might have a ten-minute break now and if I could leave 11 everybody just to see how we are doing on the time front 12 and how long it is thought we need to sit on this 13 afternoon. All right. So we'll just have ten minutes. 14 (3.57 pm) 15 (A short break) 16 (4.10 pm) 17 MR RITCHIE: Mr Fitzpatrick, can I turn now to the transfer 18 of responsibilities from the liaison to SSI. You 19 mentioned this morning that you thought that happened in 20 around July 2012? 21 A. Yes, from the OLS to the ASI was official in July. But 22 the whole SSI creation was in December 2011. 23 Q. Did you try to fight against that? 24 A. I think we all did to be perfectly honest, but it was 25 imposed on us by Sonatrach. Page 224</p>

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<p>1 Q. In December 2012 there was a written stern reminder of 2 the exclusive control of SSI that we have been provided 3 with a translation of. Were you aware of that written 4 reminder? 5 A. A reminder, no. 6 Q. Let me take you to it. It is core bundle 1, I think 7 that is a green bundle for you, tab 3. You are fluent 8 in French so you are probably happy with the French but 9 we are working off the translation just after it. So 10 that is page 13? 11 A. Yes. 12 Q. Sonatrach establishment of the internal security 13 management. Decision dated 5 July and then the minutes 14 of the district security commissioner's report: 15 "...the involvement of expatriate managers in the 16 management of internal security which is contrary to the 17 current regulations in force. In particular regarding: 18 "- communications with the military authorities." 19 And then over the page there are things you are not 20 supposed to be doing and that includes liaising with the 21 authorities and the security services. Did this 22 reminder get communicated to you? 23 A. I'm going to go back to the French one if you don't 24 mind. 25 Q. Yes. (pause)</p> <p style="text-align: center;">Page 225</p>	<p>1 Q. Do you remember the last time he visited the site? 2 A. I can't have been there in 2011 when he visited. 3 Q. Second topic then. Unauthorised access. Murielle Ravey 4 has provided a witness statement to Her Majesty's 5 Coroner that fire drills were regularly held at the 6 facility. Do you recall regular fire drills? 7 A. Yes. 8 Q. And that roll calls were done during the fire drills and 9 that 20 unauthorised people were found on site at one of 10 those roll calls. Were you aware of that? 11 A. Yes. 12 Q. That was an example of extremely poor access control on 13 the site, wasn't it? 14 A. I'm trying to remember, who were the 20 people? 15 Q. She didn't name them. 16 A. I think they were -- no, no, they were project staff, 17 personnel, but they hadn't left on contract basically 18 when they should have done. So they were project 19 personnel but instead of leaving on rotation and going 20 home they didn't, they stayed on base. I believe that's 21 what you're talking about. 22 Q. Can I come to armed men entering BdV or the CPF. 23 Gary Butt has written in his witness statement, he's 24 witness 57 and the reference is page 8 of his first 25 witness statement, that it was the policy that the</p> <p style="text-align: center;">Page 227</p>
<p>1 A. I can't remember having seen this document before, 2 but -- 3 Q. Okay. Maybe it went in at a higher level? 4 A. We should have seen it, we should have seen it. 5 Q. You should have seen it? 6 A. Yes. 7 Q. Were you aware of any discussions between the JOC member 8 Mark Cobb and the general manager on site to ameliorate 9 that directive that you were not allowed to communicate 10 with the Gendarmes? 11 A. Yes, I believe, yes, I believe so, yes. 12 Q. And Mr Cobb told Her Majesty's Coroner that a deal was 13 struck whereby you could still report to Mr Cobb and you 14 could still communicate with the Gendarmes, in other 15 words, liaison could? 16 A. Yes, that was confirmed very late on in the year, yes. 17 Q. Thank you. Let me come to various items of security. 18 First security audits by BP's head of security, Barry 19 Shaw. Were you aware that there was a requirement of 20 regular visits by the security manager to project sites? 21 A. No, I wasn't aware of that. 22 Q. The last time that Barry Shaw had visited according to 23 Mr Porter was September 2011. Were you aware that that 24 was the last time he visited the site? 25 A. No, no.</p> <p style="text-align: center;">Page 226</p>	<p>1 civilian guards would refuse entry to Gendarmes with 2 guns and would call the supervisor, is that correct? 3 A. That's correct. 4 Q. And yet at a meeting on 12 January 2013, you weren't 5 present then, you were off-site, Tore Bech said that he 6 saw armed men in uniform at the CPF during your slot 7 in December when you were present. Were you aware of 8 the assertion that armed men in uniform had been into 9 the CPF? 10 A. No. Again, they wouldn't report to me. They would have 11 reported to the ASI. So if the guards did report it 12 they would report it to the ASI and not to us. 13 Q. I understand that but you were there to monitor and 14 advise on security, weren't you? 15 A. I think you must understand the reporting chain now is 16 no longer to me or to Paul. It was directly to the ASI 17 and if the ASI decides he doesn't want to inform me, 18 then he wouldn't inform me and Tore Bech didn't speak to 19 me about it. 20 Q. Gary Rose, witness 54, in his second witness statement 21 at page 4 and his first witness statement at page 6, 22 says: 23 "This was discussed and there was general agreement 24 that they were unlikely to be Gendarmes because 25 Gendarmes knew they weren't allowed in the CPF."</p> <p style="text-align: center;">Page 228</p>

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<p>1 Were you present during any such discussions?</p> <p>2 A. No, I was not.</p> <p>3 Q. I will move then to Sunday, 13 January. Again, you were</p> <p>4 present on site on Sunday, 13 January. DB,</p> <p>5 a translator, has provided a witness statement to Her</p> <p>6 Majesty's Coroner. She is witness 63. The reference is</p> <p>7 pages 6 to 7. She says that on that day, Sunday, 13th</p> <p>8 "two Gendarmes came to BdV for what they called</p> <p>9 a security inspection and were on site for two hours."</p> <p>10 Were the Gendarmes allowed to do a security</p> <p>11 inspection of BdV?</p> <p>12 A. They would if they wanted to carry out because they are</p> <p>13 the security plan, the security intervention plan. So</p> <p>14 they need to see inside bases to sensitive areas that</p> <p>15 could be attacked or could be attacked by terrorists,</p> <p>16 sabotaged et cetera.</p> <p>17 Q. So that would be an acceptable thing to happen to your</p> <p>18 understanding?</p> <p>19 A. It would be if it was agreed with management.</p> <p>20 Q. She goes on to say they spoke to Slimane, do you know</p> <p>21 him? Who was a manager who immediately fell ill and</p> <p>22 asked to be transported off site and was allowed to go</p> <p>23 the next day?</p> <p>24 A. No.</p> <p>25 Q. Can I come to mass casualty exercises. These apparently</p> <p style="text-align: center;">Page 229</p>	<p>1 about it?</p> <p>2 A. I never saw bags being allowed to come straight through</p> <p>3 without being searched, no.</p> <p>4 Q. That is what Gary Rose has written. If you had been</p> <p>5 aware of this would you have regarded that as a security</p> <p>6 lapse?</p> <p>7 A. Most definitely.</p> <p>8 Q. JV vehicles being taken off-site. Gary Rose, again,</p> <p>9 page 3 of his witness statement says:</p> <p>10 "JV vehicles were taken off-site without being</p> <p>11 locked."</p> <p>12 And that he checked the logs in the guardhouse</p> <p>13 himself or wherever the logs were, complained about it,</p> <p>14 and was told by Sonatrach managers "we are not going to</p> <p>15 do anything about it." Were you aware that JV vehicles</p> <p>16 were being taken off-site without being logged?</p> <p>17 A. No.</p> <p>18 Q. If you had found that out would that have been</p> <p>19 a security breach?</p> <p>20 A. Yes, it would.</p> <p>21 Q. The alarm. I think we have already dealt with this in</p> <p>22 evidence. The alarm at the CPF did not distinguish</p> <p>23 between fire and security, did it?</p> <p>24 A. Well, you had to manually operate it to turn it from</p> <p>25 a continuous siren, which it is, into intermittent. So</p> <p style="text-align: center;">Page 231</p>
<p>1 should have been carried out annually according to</p> <p>2 Murielle Ravey, were you aware of that?</p> <p>3 A. I think so. I was aware that they carried them out.</p> <p>4 Q. None had been done since 2010 had they?</p> <p>5 A. I don't know.</p> <p>6 Q. I assume liaison would have some part to play in those</p> <p>7 mass casualty exercises if they were going on outside</p> <p>8 BdV and the CPF?</p> <p>9 A. Yes, they would.</p> <p>10 Q. And the exercise of 13 January some three days before</p> <p>11 the attack was cancelled due to the drivers threatened</p> <p>12 strike and the lack of Gendarmes cover?</p> <p>13 A. No, Paul left that in his handover notes. I understood</p> <p>14 that.</p> <p>15 Q. Next security checks not being done. Gary Rose has</p> <p>16 given evidence, witness 54, first witness statement,</p> <p>17 page 2, that Algerian national vehicles were often not</p> <p>18 checked by the SSI guards. You were aware of that</p> <p>19 sloppiness, weren't you?</p> <p>20 A. Yes, I was. We all were.</p> <p>21 Q. And also Gary Rose, page 2, says Algerian national's</p> <p>22 bags were often not checked. They were just waved</p> <p>23 through the pedestrian entrance?</p> <p>24 A. I never saw that.</p> <p>25 Q. You never saw it but you were aware of the complaint</p> <p style="text-align: center;">Page 230</p>	<p>1 it had to be manually operated.</p> <p>2 Q. On/off, on/off, on/off for security.</p> <p>3 A. Yes.</p> <p>4 Q. Now, as I understand the rules if it is a constant siren</p> <p>5 for fire you are supposed to leave the building and go</p> <p>6 to the muster point?</p> <p>7 A. Mmm.</p> <p>8 Q. If it is an intermittent alarm for security you are</p> <p>9 supposed lock the door and hide?</p> <p>10 A. That's correct.</p> <p>11 Q. Therefore if these are mucked you can put expats in</p> <p>12 danger by having no security alarm, just a fire alarm,</p> <p>13 on a security alert they would be going towards the</p> <p>14 terrorists rather than locking their doors. That would</p> <p>15 be a dangerous state of affairs?</p> <p>16 A. I don't know how it was operated, the security alarm at</p> <p>17 the CPF, so I can't comment, but ...</p> <p>18 Q. But you knew that there was only a single tone security</p> <p>19 alarm at the CPF?</p> <p>20 A. Yes, and you needed to manually operate it to</p> <p>21 distinguish it from -- intermittent, yes. The guards</p> <p>22 did do this on regular occasions.</p> <p>23 Q. What, manually operate the alarm?</p> <p>24 A. Yes, to test it, yes.</p> <p>25 Q. Access to BdV. Can I take you to the unused material.</p> <p style="text-align: center;">Page 232</p>

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<p>1 That is a file we haven't looked at before. Relevant 2 unused material. Page 960. The witness may need to be 3 helped with the unused material bundles. In my unused 4 it is file 4. It is an internal note. It is a BP 5 Statoil Hydro note and it is tab 10, sub-tab H, 10H. So 6 unused, file 4, sub-tab 10H. 7 Thank you very much, Ms Dolan. 8 I will read this for the benefit of the families. 9 It is on JV headed notepaper: 10 "In Amenas unauthorised vehicle incursion report. 11 "Introduction. The following report details 12 information that has been revealed in the aftermath of 13 the incident concerning the unauthorised vehicle 14 incursion that occurred on 2 September 2008. The 15 initial incident report is attached to this report for 16 reference." 17 I drop down to the first bullet point: 18 "Before arriving at VCP1 the driver of the truck 19 passed through the Gendarme checkpoint at the junction 20 of RN3 and the project hardtop road. We do not know 21 what checks if any took place of his identity, 22 destination or vehicle load or if indeed the vehicle 23 passed the checkpoint on to the project road 24 unchallenged." 25 Bullet point 2: Page 233</p>	<p>1 cabin of his truck, collected the metal bar, tried to 2 attack the group before he was disarmed." 3 I drop two lines: 4 "The driver then jumped into his vehicle, bypassed 5 the checkpoint, before he headed towards the CPF at 6 speed. Hotel 17 contacted the OLA that the truck had 7 departed VCP1 at speed towards the CPF. When the truck 8 driver drove past the OLA was at the junction of the 9 project road and the approach to companies camp. CPF 10 guards were instructed to shut the main gates. At the 11 IA a military detachment was informed that an incident 12 was in place and assistance was requested. On arrival 13 at the CPF the OLA pulled over into the external parking 14 area as the truck was in the process of making a U-turn 15 at the CPF entrance. The OLA disembarked his vehicle 16 and gestured to the driver to stop. During the 17 execution of the U-turn movement the driver clipped the 18 rear of the OLA's vehicle. The OLA had eye contact at 19 all times and had sufficient time to move himself. The 20 driver then returned in the opposite direction at speed 21 followed by the OLA before he was eventually stopped by 22 units deployed from the Gendarmerie." 23 Then dropping down to the final paragraph there: 24 "Following the incident the driver was released we 25 believe at some stage during the two days following the Page 235</p>
<p>1 "The vehicle and driver arrived at VCP1 checkpoint 2 and was stopped by the liaison security guard who 3 requested the driver's Ordre de Mission paper. This 4 document was apparently on Enafor headed paper but the 5 main text of the document clearly stated that the 6 vehicle cargo was destined for delivery at Nabors rig 35 7 at Larache 60 kilometres further south. The security 8 guard did not check the document thoroughly and presumed 9 the vehicle was destined for the Enafor camp. Whilst 10 the security guard was controlling the driver's 11 paperwork another JV employee from the construction 12 department who had followed the driver from the Gendarme 13 checkpoint arrived and spoke to the driver. The JV 14 employee told the vehicle driver he had been travelling 15 at an excess speed and should follow the maximum speed 16 limits in force. The tone of the conversation between 17 the two persons was deemed aggressive. The HSE land 18 transport representative permanently stationed at VCP1 19 spoke to the driver and asked him to move his vehicle to 20 the parking area." 21 I drop another bullet point: 22 "The IA land transport technician, hotel 17, arrived 23 on the scene and managed to calm the situation. He then 24 briefly left the group and the argument erupted once 25 more and a scuffle broke out. The driver went to the Page 234</p>	<p>1 incident. He was allowed to take his truck as well. 2 The Gendarmerie were contacted and they verbally 3 informed us that although the investigation was 4 continuing they did not believe this incident was 5 related to terrorism but it was a misunderstanding. We 6 are unlikely to obtain written confirmation of the 7 precise details and the reason behind the incident." 8 The control at La Recule was not perfect, was it? 9 A. The control at La Recule was -- well, the VCP at the 10 La Recule was manned by the Gendarmerie Nationale with 11 a group of GLD during the day and then reinforced by 12 Gendarmes from Tigantourine during the night. So their 13 job was to control all access to the permanent access 14 road and to the CPF road. 15 Q. Thank you for their job description. It wasn't perfect, 16 was it? 17 A. I wasn't there at this time I am afraid so I don't know 18 if it was perfect or not. Obviously not. 19 Q. No it wasn't it. The lorry got through and it shouldn't 20 have? 21 A. Obviously not. Well there could have been confusion. 22 Q. There clearly was and this lorry which got to VCP1, the 23 driver had a fight, taking an iron bar, and drove past 24 VCP1, past BdV to CPF and did a three point turn. This 25 system was nowhere near foolproof, was it? Nowhere near Page 236</p>

<p>1 foolproof?</p> <p>2 A. Which system are you referring to?</p> <p>3 Q. The system of stopping people getting to BdV and the</p> <p>4 CPF, it wasn't foolproof, was it, Mr Fitzpatrick?</p> <p>5 A. I'm trying to read through the report at the same time</p> <p>6 you are asking questions and it is my understanding that</p> <p>7 no, the vehicle did get to the CPF but the gates were</p> <p>8 closed.</p> <p>9 Q. This vehicle could have had a bomb in it or ten</p> <p>10 terrorists in the back.</p> <p>11 Can I come then to Paul Morgan. Murielle Ravey has</p> <p>12 given a witness statement. She is witness 53. It is</p> <p>13 page 5 and she says she was told by Paul Morgan:</p> <p>14 "Security is a mess. We have no control."</p> <p>15 Were you aware of that view of his?</p> <p>16 A. No, I wasn't, no.</p> <p>17 Q. Gary Rose has given a witness statement to Her Majesty's</p> <p>18 Coroner, witness 54, page 7. Paul Morgan told him</p> <p>19 directly "We've lost control of security. Nobody would</p> <p>20 listen to him." Were you aware of that?</p> <p>21 A. We had lost control of it. We no longer managed the</p> <p>22 security team. It was taken over by Sonatrach. Lock</p> <p>23 stock and barrel.</p> <p>24 Q. Finally on causation. When the terrorists attacked the</p> <p>25 bus the Gendarmes defended the bus by all accounts and</p> <p style="text-align: center;">Page 237</p>	<p>1 a shared responsibility?</p> <p>2 A. It is my belief that it is the Algerian government and</p> <p>3 the security forces on location who are responsible --</p> <p>4 who formulate and generate the security plan.</p> <p>5 Q. Are you aware of the Wali being given copies of the</p> <p>6 security plan and being asked to agree or otherwise it?</p> <p>7 A. No, I think you're talking -- are you talking about the</p> <p>8 plan ORSEC?</p> <p>9 Q. Am I talking about what?</p> <p>10 A. It is the emergency preparedness. So natural disasters</p> <p>11 and that sort of thing. That is the document that would</p> <p>12 be sent to the Wali.</p> <p>13 Q. I am going to very briefly take you to a couple of the</p> <p>14 articles and the rules and if it is something you can't</p> <p>15 assist with then say. I think you will find it in your</p> <p>16 green bundle, the core bundle 1, we put it at tab 26.</p> <p>17 A. Which tab?</p> <p>18 Q. Tab 26. The final tab in the bundle. There will be</p> <p>19 three sections from it. Do you have that,</p> <p>20 Mr Fitzpatrick?</p> <p>21 A. I only have a tab 25.</p> <p>22 Q. I think you are about to be handed -- it may not</p> <p>23 actually have made its way into the witness bundle.</p> <p>24 (Handed) This is a translation of -- there are three</p> <p>25 documents here. They should be separately tabulated.</p> <p style="text-align: center;">Page 239</p>
<p>1 no lives were lost or hostages taken on that bus. Is it</p> <p>2 right that if the Gendarmes are under attack, your</p> <p>3 experience tells you they would have fought back and</p> <p>4 defended?</p> <p>5 A. Yes, yes, sir.</p> <p>6 MR RITCHIE: Thank you.</p> <p>7 Questions from MS GERRY</p> <p>8 MS GERRY: Mr Fitzpatrick, I ask questions on behalf of</p> <p>9 Sebastian John's family.</p> <p>10 I wanted to start by asking you some questions about</p> <p>11 the responsibility for internal security arrangements</p> <p>12 within the facility. I took Mr Collins when he gave</p> <p>13 evidence to some rules that were given by the Algerian</p> <p>14 authorities on this matter. The first question, are you</p> <p>15 aware or do you have any familiarity with the rules and</p> <p>16 laws about the divisions and responsibility, the</p> <p>17 protection of sites such as In Amenas?</p> <p>18 A. In what sense?</p> <p>19 Q. If I suggested to you that the rules seem to set out</p> <p>20 that it is the responsibility of the head of the</p> <p>21 facility to draw up and have an internal security plan,</p> <p>22 but there is a joint responsibility between both the</p> <p>23 head of the facility and the Algerian authorities to</p> <p>24 ensure that the appropriate methods and measures are put</p> <p>25 in place for the security and safety of the facility,</p> <p style="text-align: center;">Page 238</p>	<p>1 If I just ask you first of all to look at the first one</p> <p>2 which is 27 September 1995 in the top right-hand corner</p> <p>3 for your orientation. If I just ask you to go to the</p> <p>4 second page. At the top it says "Rulings", 95-24</p> <p>5 reading across, "Relating to the protection of public</p> <p>6 property and the safety of persons associated with it."</p> <p>7 Do you have that at the top?</p> <p>8 A. Yes, yes.</p> <p>9 Q. If then you go forward to page 3 in the top right-hand</p> <p>10 corner which is the actual ruling and I think if you</p> <p>11 look down the left-hand column you will come to the</p> <p>12 bottom which says "Chapter 1, general provisions", do</p> <p>13 you see that?</p> <p>14 A. Yes.</p> <p>15 Q. And here the article 1:</p> <p>16 "This ruling determines the general rules for the</p> <p>17 protection of public property and the safety of persons</p> <p>18 associated with it."</p> <p>19 Yes?</p> <p>20 A. Yes.</p> <p>21 Q. And then go across to chapter 2, if you move your eyes</p> <p>22 over:</p> <p>23 "Accountability and responsibilities."</p> <p>24 Do you see that?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 240</p>

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<p>1 Q. Article 8: 2 "The head of establishment is directly responsible 3 for the protection of the establishment. In this 4 regard, he may take the assistance of qualified 5 employees and set up an organic structure in charge of 6 the internal safety of the establishment." 7 Then it says: 8 "The terms and conditions of the application of this 9 article is to be specified through regulations". 10 Article 9: 11 "This responsibility is exercised within the 12 establishment, for which he is responsible, as well as 13 its outbuildings and immediate surroundings as 14 stipulated in the internal safety plan of the 15 establishment." 16 Article 10: 17 "The head of the establishment exercises official 18 authority on the entire staff involved in the safety 19 operations within the establishment." 20 Then turning over, article 11, which is where 21 I suggest the involvement obviously of the Algerian 22 authorities comes in. Article 11: 23 "The direct responsibility of the head of the 24 establishment does not exempt the higher authorities and 25 those that are accountable to them, particularly in Page 241</p>	<p>1 second tab. I am sorry this isn't paginated. 2 THE CORONER: You may have section B. 3 A. Section B. I don't have a tab here. 4 MS GERRY: Sorry. 5 THE CORONER: It may say 8 May 96 I think. 6 MS GERRY: Yes. Do you have that, Mr Fitzpatrick? 7 A. Yes. 8 Q. Can you find for me chapter 1, so it is the first page 9 you will come to that has as we were looking at before, 10 the sort of double columns and it has number 6 in the 11 top left-hand corner, Official Journal of the Algerian 12 Republic, number 28? 13 A. Number 6. Yes, I have number 6. 14 Q. So in your chapter 1 down in the bottom of the left-hand 15 column, purpose of internal workplace security. Do you 16 have that? 17 A. Yes. 18 Q. If you then go across to article 4 in chapter 2: 19 "The internal workplace security regulation and plan 20 are prepared by the manager in connection with the 21 authorised authorities." 22 Yes? 23 A. Yes. 24 Q. And then down at the bottom article 7: 25 "The internal workplace security plan and Page 243</p>
<p>1 terms of assistance, coordination, control and 2 evaluation of the measures approved." 3 Article 12: 4 "Notwithstanding the provisions of this ruling the 5 protection of the public property remains within the 6 field of competence of general responsibility of the 7 public safety departments. Furthermore, the latter may 8 be solicited by the establishments to provide their 9 assistance for internal safety." 10 And then 13: 11 "The head of the establishment is liable to 12 implement all the existing legal and statutory 13 provisions and measures for the protection of assets and 14 safety of persons." 15 That reads to me like there is a joint 16 responsibility if I can put it that way, in the sense it 17 is for the head of the establishment to be in charge of 18 the internal safety but there is a responsibility on the 19 authorities to provide the head of the establishment any 20 assistance, coordination et cetera that is required in 21 order to implement those measures. Do you see that? 22 Was that not your understanding? 23 A. No, that is my understanding. 24 Q. Thank you. And then just very quickly moving forward 25 just as I mentioned about the Wali, if you go to the Page 242</p>	<p>1 regulations are filed by the workplaces with the Wali 2 and the territorially competent security service 3 director. The Wali [district administrator], after 4 obtaining the opinion of the security commission of the 5 Wilaya [district], approves the internal security plans 6 and regulations which are submitted to him." 7 Do you see that? 8 A. Yes. 9 Q. Is that something you understood happened? 10 A. It would have gone through, yes, but that would have 11 gone through, I suspect, through the military. 12 Q. Okay? 13 A. The military would be liaison with the Wali for security 14 plans because they would be confidential. 15 Q. But do you accept it is for the workplace management to 16 formulate their plans and to be responsible for internal 17 security? 18 A. The ASI, yes, they do. The ASI does have an internal 19 security plan. 20 Q. Let us do this prior to the transfer over to the SSI. 21 So before July 2012 was it the responsibility of the JV 22 to formulate a plan to ensure the safety of the 23 interior, the internal parts of the facility? 24 A. That would have been through Sonatrach. It wouldn't 25 have been through the JV because we have no official Page 244</p>

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<p>1 contact, if you like, with the Wali, so ...</p> <p>2 Q. So internal security as far as you understood was purely</p> <p>3 the responsibility of Sonatrach and the Algerian</p> <p>4 authorities?</p> <p>5 A. No, not purely. If I can -- we were, if I remember</p> <p>6 rightly, we are in compliance with the Algerian decrees</p> <p>7 on the security of establishments et cetera et cetera.</p> <p>8 We are in -- these documents can be found at In Amenas</p> <p>9 and that is through the security management plan</p> <p>10 et cetera et cetera. So we are in compliance with their</p> <p>11 directives.</p> <p>12 Q. I don't want to take up time on something I haven't</p> <p>13 asked you so I just want to re-ask you the question.</p> <p>14 A. The security management plan is part of that.</p> <p>15 Q. Specifically in terms of the responsibility for the</p> <p>16 internal security of In Amenas gas facility would you</p> <p>17 agree that it is the joint responsibility between the JV</p> <p>18 and the Algerian authorities?</p> <p>19 A. It is now for sure.</p> <p>20 Q. It wasn't then, is that what you are saying?</p> <p>21 A. I honestly can't confirm that.</p> <p>22 Q. Can I ask you to take up your witness statement. I hope</p> <p>23 you have it in front of you. It is going to page 4 of</p> <p>24 your first statement.</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 245</p>	<p>1 ensure that the plan that we have devised can be</p> <p>2 properly carried out?</p> <p>3 A. Yes, and we have done that in the past.</p> <p>4 Q. In relation to the manning of the towers and in relation</p> <p>5 to getting the electronic doors in place and in relation</p> <p>6 to the fences being concreted in, those are examples,</p> <p>7 are they, of things that you felt needed to be done but</p> <p>8 weren't being done?</p> <p>9 A. Yes.</p> <p>10 Q. Can I just finally on this topic, ask you to have --</p> <p>11 sorry, I should have made sure you had this in front of</p> <p>12 you. It is the exhibit ZL6 which is the translation of</p> <p>13 the press conference with the Algerian Prime Minister.</p> <p>14 (Handed)</p> <p>15 Mr Fitzpatrick, what this is, is it, is</p> <p>16 a translation of a press conference that was held with</p> <p>17 the Prime Minister after the events in In Amenas. Mine</p> <p>18 is paginated but it is the fifth page in if I can ask</p> <p>19 you to go to that.</p> <p>20 A. Yes, I'm there.</p> <p>21 Q. Does the very top of your page start "Everyone and</p> <p>22 I have always said this was a matter of time"?</p> <p>23 A. That's correct.</p> <p>24 Q. Can I ask you to run your eyes down and go to the second</p> <p>25 substantive paragraph which says:</p> <p style="text-align: center;">Page 247</p>
<p>1 Q. If you go to the paragraph that begins "My company is</p> <p>2 contracted", which is just up from the bottom holepunch.</p> <p>3 Do you see that?</p> <p>4 A. Yes.</p> <p>5 Q. "My company is contracted to assess the security</p> <p>6 requirements of a particular site or project with the</p> <p>7 client and advise on plans to address these</p> <p>8 requirements. We then liaise with the Algerian</p> <p>9 governmental agencies, primarily the military. The</p> <p>10 military provide personnel to help protect the site or</p> <p>11 project."</p> <p>12 So where you say there "we liaise with the Algerian</p> <p>13 governmental agencies", two questions, who is the "we"</p> <p>14 and who are the governmental agencies?</p> <p>15 A. "We" would be the JV or liaison, the liaison department.</p> <p>16 Q. And the government agencies?</p> <p>17 A. The government agencies are the DPP. It's a Sonatrach</p> <p>18 division at Hassi Messaoud that allows us to organise</p> <p>19 and coordinate protection of all the various sites that</p> <p>20 we occupy.</p> <p>21 Q. So would you agree that if and when formulating the</p> <p>22 internal security plans there was a perceived need for</p> <p>23 additional resources or some additional equipment that</p> <p>24 there was the ability of the JV to go to the Algerian</p> <p>25 authorities and say: we need X and we need X in order to</p> <p style="text-align: center;">Page 246</p>	<p>1 "Regarding the security of the premises."</p> <p>2 Do you see that?</p> <p>3 A. Yes.</p> <p>4 Q. It says:</p> <p>5 "Regarding the security of the premises a system was</p> <p>6 put in place which after evaluation was agreed by our</p> <p>7 foreign partners. It is what we call a SIE system,</p> <p>8 a system of internal security that was evaluated by..."</p> <p>9 And he goes on to say he is not going to give any</p> <p>10 figures because he judges them to be confidential:</p> <p>11 "For every economic infrastructure in the country</p> <p>12 there was what we call a distant security, a close</p> <p>13 security and internal security."</p> <p>14 Then it says:</p> <p>15 "The distant security was assured by the army and</p> <p>16 the close security by the Gendarmerie squadron."</p> <p>17 And then going down do you see where it says:</p> <p>18 "Inside the plant there is what we call internal</p> <p>19 security which is assured by the DSP."</p> <p>20 The preventative security directorate. So again</p> <p>21 there it seems to be, doesn't it, that the</p> <p>22 Prime Minister is as well saying that there is the</p> <p>23 internal security plan or system plan was put in place</p> <p>24 which was agreed by our foreign partners. So again</p> <p>25 there seems to be some kind of agreement between the</p> <p style="text-align: center;">Page 248</p>

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<p>1 Algerian authorities and the foreign partners as to the 2 security plans, do you agree? 3 A. Mmm. 4 Q. Again, does that -- do you know what SIE is? Is that 5 something you have come across before? 6 A. I should know it. 7 Q. You may be familiar with it in French? 8 A. I think it's security intern or something else. I am not 9 sure. 10 Q. It says after a system of internal security? 11 A. Yes. 12 Q. Is that the plan we have been discussing? 13 A. Sorry. 14 Q. Is that the sort of plans and what we have been 15 discussing about setting up the internal security? 16 A. The security intern is the entity, the guards et cetera. 17 It is the guard force. 18 Q. I want to move on then to the arming of civilian guards. 19 Can I ask you to -- sorry, you can put that to one side. 20 Can I ask you to take up the core bundle, which is the 21 green bundle 1, and tab 11. This is a document we 22 looked at a number of times now. It is December 2012. 23 A. Yes. 24 Q. The December 2012 security management plan. If you can 25 go through internally paginated number 8 or 97. The top Page 249</p>	<p>1 ethical reasons because retired generals basically 2 create these companies and then force them on to foreign 3 oil and gas companies within Algeria. It's another way 4 of, you know, profiteering, I suspect. I don't know. 5 Q. Was this at the time when the company camp was being 6 changed from the accommodation for the military, the 7 Gendarmes? 8 A. Yes. 9 Q. So was it in response to the fact that you were no 10 longer now going to have an armed presence in the 11 accommodation area, the BdV and the CPF? 12 A. No, they just said basically you have to start 13 recruiting armed guards. There was no reason for it at 14 all. 15 Q. Why is it that this is still appearing in a document 16 in December 2012? 17 A. Well, you will -- I can only speculate. You will need 18 to address this with my line manager. 19 Q. Can I ask you then to go to your second witness 20 statement, page 4 of that? 21 A. I hope this is the second. 22 Q. It should be -- there is the seven pages of it. 23 A. Yes. 24 Q. If I can ask you to go to page 4. 25 A. Yes. Page 251</p>
<p>1 of that page, do you see the italicised, the second 2 paragraph in italics? 3 A. Yes. 4 Q. It says: 5 "Comment on civilian armed guards. Several attempts 6 by local authorities have been made to impose armed 7 guards on project locations. That has been judged as 8 unacceptable on the grounds of ethical issues associated 9 with health and safety risks and cost." 10 Do you see that? 11 A. Yes. 12 Q. Are you able to assist us with what those several 13 attempts are by local authorities? 14 A. Yes, on one occasion when I was on rotation, I think it 15 was in 2006, basically the lieutenant who was head of 16 the local detachment at the time came to the office and 17 basically said right, I've received the instruction from 18 general or a general, a retired general and basically 19 you need to now start recruiting armed guards. 20 Q. So just to be clear, this is 2006, so what was happening 21 at this time to give rise to that conversation? 22 A. It was -- sorry, 2005 because -- sorry, it was 2005 23 because the business BP unit leader was still on site 24 and I discussed this with him. There was nothing 25 specific happening and this is why we make allusion to Page 250</p>	<p>1 Q. If you go down to the second holepunch and read up to 2 the beginning of that paragraph that starts "The liaison 3 armed capability", do you see that? 4 A. The second punch line? 5 Q. Three lines up from the bottom holepunch. "The liaison 6 armed capacity"? 7 A. The liaison armed capability. 8 Q. "The liaison armed capability was removed in 2000 when 9 new legislation was enacted in Algeria. This requires 10 licence for firearms which would not be approved for 11 expat foreign nationals." 12 Can I ask you to explain that? 13 A. Well, prior to 2001 there was a Bechtel pipeline project 14 and this was before my time but the expat liaison team 15 were armed. 16 Q. Just to be clear, which team were armed? 17 A. The expat liaison team. 18 Q. And within? 19 A. This was on a Bechtel job but it was still Sterling, the 20 company. 21 Q. So until that time it was possible legally for expats to 22 be armed? 23 A. Yes, yes. 24 Q. And then there came a time, you have said in 2000, when 25 that was no longer the case? Page 252</p>

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<p>1 A. Yes, I don't know the exact date and I gave 2000 as an 2 approximate, but when I arrived in 2001 in country the 3 weapons were still on location but they weren't 4 allowed -- we weren't authorised to use them. 5 Q. But it is right to say, isn't it, that that is only in 6 relation to expat and foreign nationals, so security 7 guards who were not foreign nationals could be armed? 8 A. Yes. 9 Q. And the guards at In Amenas were obviously local, they 10 weren't expats and they weren't foreigners? 11 A. That's right. 12 Q. So legally it would have been possible to arm your 13 guards? 14 A. Yes, it would, yes. 15 Q. Was there any ever any consideration given to arming 16 your guards in In Amenas? 17 A. I believe -- again, you will need to speak to the 18 business support manager. 19 Q. If there are another witness it is better to ask I will 20 leave it. 21 A. Yes. 22 Q. We heard from Mr Battram last week and when he gave 23 evidence he confirmed what he had put in his witness 24 statement. Rather than take time I will just read what 25 the witness statement says, and this is in relation to Page 253</p>	<p>1 stopped. That would need to be -- you would need to 2 address that with the business support manager I think. 3 Q. Just to be clear, you were never given a reason why you 4 weren't being supplied with the things you were asking 5 for? 6 A. No, no. 7 Q. Turning then to the borders and the military protection 8 zone. I hope you might still have to hand the 9 translation of the Prime Minister's press conference? 10 A. No, it's gone back. 11 Q. Sorry, I should have said I was going to need it again. 12 (Handed). Can I ask you to go to the second page and 13 then down to the bottom holepunch and the paragraph that 14 starts "Anyhow you have been following the news". 15 A. Yes. 16 Q. Do you have that? If you go down five lines you come to 17 "kilometres or more". Do you have that line? 18 A. Sorry, where? 19 Q. About five lines down it says "kilometres or more"? 20 A. Yes. 21 Q. And then the next sentence starts: 22 "The In Amenas plant comprises of 4 hectares that 23 make the living compound and 10 hectares that include 24 the gas plant. That makes it an extremely difficult 25 area to control even for special military forces to Page 255</p>
<p>1 concerns he was raising about the condition of the bases 2 and the reaction that he faced. 3 He says in his statement: 4 "I suggested that the perimeter fence of BdV could 5 be made a bit more secure if we used those centre of the 6 road traffic concrete posts you see down on the 7 motorways." 8 He goes on to explain what the fencing was and there 9 was barbed wire. He says this: 10 "Again, it was dismissed by George Griesdieck who 11 told me we don't spend money on that sort of stuff. 12 I said again that I thought the entrance to the camp was 13 weakly protected, it was basically an S-shaped 14 crocodile." 15 What I really want to specifically ask you about is 16 his comment when he says that he was told "we don't 17 spend money on that sort of stuff". 18 In relation to requests you were making for 19 improvements to fencing and to electronic gates was 20 that, do you think, or the delay in that, do you think 21 that was done to a lack of willingness to spend money on 22 those items? 23 A. I can't comment honestly. The physical security upgrade 24 did begin in 2007 so things were put in place, measures 25 were put in place and I don't know the reason why it was Page 254</p>	<p>1 intervene. If you were to visit it you would see the 2 living compound in Algerian style and expats separate 3 and both away from the gas plant." 4 Was it your view that the Algerian authorities 5 thought this was an area that was extremely difficult to 6 control? 7 A. No, no, certainly not. The Gendarmes, the 8 Captain Hocine, he assured me on a number of occasions 9 that it was a perfectly safe area and perfectly safe 10 zone. 11 Q. Can I ask you then to go forward four pages to page 6 in 12 the document, so one page on from the page that had 13 about the internal security system? 14 A. Yes. 15 Q. Do you have there, if you go again to the bottom 16 holepunch, so that section where the Prime Minister is 17 answering a question. Looking directly across from the 18 holepunch right at the very end of that line it says 19 "I repeat"; do you see that? 20 A. Sorry, I have come to the -- 21 Q. If you go to the bottom holepunch. Take your eyes 22 directly across that line and then right at the end of 23 that line you will see the words "I repeat" on the 24 right-hand side. 25 A. No, I don't have "I repeat". Page 256</p>

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<p>1 Q. It is nine lines up from the bottom of that paragraph. 2 It starts "have knowledge of the land that I mentioned 3 to you based on precise investigations". It should be 4 page 6. 5 A. I think I'm on page 6. Is there -- 6 THE CORONER: What is the first word on your page. 7 A. The first word on the page, well the two words, "this 8 affair". 9 MS GERRY: We are on a different page. Go forward two. The 10 next page says everyone, the next page says "PM", his 11 question. Go down to the bottom holepunch. Read right 12 across from the holepunch to "have knowledge of the land 13 I mentioned to you based on a precise investigation" and 14 then it say: 15 "I repeat precise investigation that the group set 16 off about two months ago at Aguelhouk region and went 17 along the Algerian-Malian and then Algerian-Niger and 18 then drove in a perpendicular line and entered the 19 Libyan territories in order to reach the zone I 20 mentioned ... It was therefore very difficult to spot 21 those individuals. We are talking about thousands and 22 thousands of kilometres. We have our capacities and 23 means. Our military forces have the means to determine 24 tasks at some particular times and when it is done their 25 reaction is immediate. Unfortunately the borders are Page 257</p>	<p>1 A. Yes. 2 Q. And in there it is reported: 3 "The guards and internal security is now owned and 4 operated by the SH [Sonatrach] ASI's. Since the 5 inception of this change there have been a number of 6 events which have highlighted associated bedding-in 7 problems. The military have complained twice about the 8 drop in levels of access control to the field and sites 9 and during the recent strikes civilians were allowed 10 access to the BdV despite clear instructions to stop 11 them." 12 Do you see that? 13 A. Yes. 14 Q. As I understand your evidence, it was your understanding 15 that there was a drop in level of active involvement? 16 A. Performance, yes, certainly. 17 Q. We heard evidence from Andrew Collins earlier in the 18 inquest and his evidence was that he was only ever 19 informed that the difficulties related to problems 20 around the guards not checking the roadworthiness of 21 vehicles, and when I took him to that section he said he 22 was unaware that the military complained and that the 23 concerns were about a drop in performance. 24 Were you reporting to your line manager those sorts 25 of problems? Page 259</p>
<p>1 huge. We may need twice the size of NATO to supervise 2 those borders." 3 Was that your understanding at the time, that those 4 borders were just too large to be able to be protected? 5 A. The borders are porous but the Algerian government prior 6 to the attack had assured us, as did the local 7 Gendarmes, that the borders were now secure. Initially 8 they sent down 2,000 troop, that was increased to 5,000 9 then later on 20,000 troops were sent to the southern 10 borders. So it's quite contradictory to what he's 11 saying here to what we hear on the ground. 12 Q. I just then want to move on to a few more specifics at 13 BdV and hopefully it won't take me very long at all. 14 You have been taken through a transfer to SSI and some 15 of the problems that were occurring. 16 Can I ask you to go to the handover notes from 17 Paul Morgan which is exhibited to your own witness 18 statement. It is just after all the maps I think. 19 A. Yes, okay, got them. 20 Q. If I can then ask you to go forward to page 6. The 21 subheading "SSI internal security review." 22 A. Yes. 23 Q. Do you see that? 24 A. Yes. 25 Q. And there is a quote in italics? Page 258</p>	<p>1 A. Yes. 2 Q. Can I ask you to go back in the handover notes to 3 page 5. 4 A. Yes. 5 Q. We have here Paul Morgan's handover notes in relation to 6 the drivers industrial action on 12 and 13 January. As 7 I understand the situation, that was around a refusal of 8 one particular driver to work with the Gendarmerie? 9 A. Yes, that's correct. 10 Q. It is the case, isn't it, that you did have drivers who 11 had difficulties with the Gendarmerie and working with 12 them? 13 A. It was very difficult for the drivers to work with the 14 Gendarmes. 15 Q. Why was that? 16 A. Sometimes the Gendarmes treated them with disrespect and 17 there was the ethnic problems as well. Most of the 18 Gendarmes were Arabs, of Arab ethnicity and most of the 19 drivers were Tuaregs. 20 Q. Did that not strike you as problematic given the 21 reliance you had to place on the relationship between 22 the drivers and the Gendarmerie in order to provide the 23 escorts and control and effectively work very closely 24 together? 25 A. You know, there were incidents, there were incidents. Page 260</p>

<p>1 Most of them were very minor but this gentleman did have</p> <p>2 a major problem with the Gendarmes and the Gendarmes had</p> <p>3 a problem with him as well. It wasn't this actual</p> <p>4 captain who had the problem with this gentleman, it was</p> <p>5 the previous. But it was only after the strike when</p> <p>6 everyone came back to work that this individual decided</p> <p>7 he wasn't going to work with the Gendarmes.</p> <p>8 Q. Put that to one side. The CCTV. Could you see VCP1</p> <p>9 from any of the CCTV cameras?</p> <p>10 A. Yes, you could but it wasn't -- the camera, as I said</p> <p>11 earlier, it was one of the perimeters that we had turned</p> <p>12 into the direction of VCP1 and to VCP2. So you could</p> <p>13 see them but not very clearly.</p> <p>14 Q. And they were manned or viewed 24 hours a day?</p> <p>15 A. Yes.</p> <p>16 Q. Are you surprised that the guards viewing the CCTV, if</p> <p>17 this be the case, would you be surprised if they were</p> <p>18 unaware of the approaching terrorists and what had</p> <p>19 happened at VCP1?</p> <p>20 A. Apparently they got there and, you know, during the dark</p> <p>21 hours so they may not have seen them arriving.</p> <p>22 Q. You have lights obviously in the perimeter fence which</p> <p>23 is the whole purpose of the lights is to make the</p> <p>24 CCTV --</p> <p>25 A. VCP1 is over 1 kilometres away. If they had arrived at</p> <p style="text-align: center;">Page 261</p>	<p>1 A. Yes, it was.</p> <p>2 Q. And what happened about that?</p> <p>3 A. Again, you need to speak to the business support manager</p> <p>4 but there was a request in the early days when we did</p> <p>5 ask for an armoured bus basically to transport the</p> <p>6 expats in an armoured bus to the airport when we</p> <p>7 realised that the local air strip wasn't to be built as</p> <p>8 planned. So we did carried out a risk assessment and</p> <p>9 wanted an armoured bus but the decision never came back</p> <p>10 to me basically.</p> <p>11 THE CORONER: What do you mean the decision, you never got</p> <p>12 an answer?</p> <p>13 A. No, no. It was -- it was at the Hassi Messaoud as well.</p> <p>14 It was Mick Kemp was the ALM at the time and</p> <p>15 Julian Steel. They were the two previous ALMs and they</p> <p>16 made this suggestion to -- they gave this advice to</p> <p>17 management.</p> <p>18 MS GERRY: That was another matter you raised, asked, didn't</p> <p>19 get an answer for and never got?</p> <p>20 A. I didn't get it. They would have got it at</p> <p>21 Hassi Messaoud.</p> <p>22 Q. In relation to the advice of what to do in the event of</p> <p>23 a terrorist attack obviously the advice was to get in</p> <p>24 your room, lock your room and stay safe, is this</p> <p>25 lockdown as you described?</p> <p style="text-align: center;">Page 263</p>
<p>1 the VCP1 without headlights, which they do, they</p> <p>2 wouldn't have seen them approaching in the dark.</p> <p>3 Q. So there was no way within the control room in the CCTV</p> <p>4 monitoring room at BdV that you would be able to see</p> <p>5 what was happening at VCP1 during hours of darkness; is</p> <p>6 that what you are saying?</p> <p>7 A. Yes, only in the close proximity because VCP1 is</p> <p>8 illuminated so just in that one small area you would be</p> <p>9 able to observe.</p> <p>10 Q. So the soonest that anyone manning the CCTVs would be</p> <p>11 aware of any incursion or anybody arriving at the</p> <p>12 entrance to BdV would essentially be once they're there</p> <p>13 during darkness or once they entered the illuminated</p> <p>14 area around BdV?</p> <p>15 A. Yes, if they bypassed VCP1, yes, that's correct.</p> <p>16 Q. Sorry, it is getting late in the day it might be my</p> <p>17 fault?</p> <p>18 THE CORONER: So if in the dark you just go round the side</p> <p>19 of VCP1 you won't be able to see it?</p> <p>20 A. No, you wouldn't be able to see it until you get in</p> <p>21 close proximity of the BdV.</p> <p>22 MS GERRY: Were any of your vehicles bullet proof in any</p> <p>23 way?</p> <p>24 A. No.</p> <p>25 Q. Was that ever considered?</p> <p style="text-align: center;">Page 262</p>	<p>1 A. Yes.</p> <p>2 Q. What about if you weren't in your room. Say, for</p> <p>3 example, if you were in the football pitch or canteen?</p> <p>4 A. It was specific and if you were caught outside then</p> <p>5 basically you would find hard cover, something to</p> <p>6 protect you from ballistic projectiles basically. So</p> <p>7 you would try and find hard cover, a container, anything</p> <p>8 that's open, close it and just hide away basically.</p> <p>9 Q. You mentioned about locking the chicane area?</p> <p>10 A. Yes.</p> <p>11 Q. I am sorry, I didn't really understand how that would</p> <p>12 happen. So the chicane is beyond the first gate to the</p> <p>13 BdV?</p> <p>14 A. Yes.</p> <p>15 Q. Is there then something beyond the chicane that you can</p> <p>16 lock?</p> <p>17 A. It's in line with the -- the first three uprights of the</p> <p>18 chicane are -- just adjacent to it. There is actually</p> <p>19 a swing down anti-crash barrier that joins on top of</p> <p>20 that third upright and locks in place.</p> <p>21 THE CORONER: What does that give, a solid barrier across</p> <p>22 the road?</p> <p>23 A. Yes.</p> <p>24 MS GERRY: In terms of the service provided by the drivers</p> <p>25 when they were on strike, we have heard reference to</p> <p style="text-align: center;">Page 264</p>

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1 a minimum service being provided. As I understand your
 2 evidence, in relation to the patrols that wasn't part of
 3 the minimum service.
 4 **A. No.**
 5 Q. And what was happening was the Gendarmes were just doing
 6 that themselves without the drivers?
 7 **A. They were doing that themselves in their own vehicles,**
 8 **that's correct.**
 9 Q. I won't take you to it but in the press conference to
 10 the Prime Minister he was asked about the possibility of
 11 insider help in relation to the attack and he mentioned
 12 that one of the terrorists who had been arrested or the
 13 alleged terrorist who had been arrested was somebody
 14 called Z from Niger who was an ex-driver. Is that
 15 a name you recognise?
 16 **A. No, it's not.**
 17 Q. Have you ever been asked?
 18 **A. No, first time I've heard it.**
 19 Q. That is the first time you have heard that?
 20 **A. Yes.**
 21 Q. Were you even aware that one of the terrorists arrested
 22 was said to have been an ex-driver but you didn't know
 23 the name?
 24 **A. No.**
 25 Q. Have you been interviewed at all by the Algerian

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1 authorities?
 2 **A. No.**
 3 Q. The final questions. First of all, the relationship
 4 with Sonatrach. From your evidence it would sound like
 5 the relationship wasn't always a particularly good one
 6 or you didn't feel it was an equal relationship. How
 7 would you describe it?
 8 **A. In what context? During the strike?**
 9 Q. Well, generally in terms of -- did you feel they would
 10 impose things upon you, so deciding, for example, that
 11 the security guards or the access control guards are
 12 going to be transferred and that was it there was no
 13 discussions on --
 14 **A. Yes, there was no discussion. I believe there was no**
 15 **discussion at the higher levels, at the general manager**
 16 **level et cetera, the JOC. I think it was just imposed.**
 17 Q. In respect of trying to move forward some of the
 18 requests you were making, do you have a view on how
 19 Sonatrach were involved in that or approached that or
 20 not?
 21 **A. No, I don't.**
 22 Q. But again, would your line manager be the best person to
 23 ask questions of?
 24 **A. Yes, it would, the line manager actually, yes.**
 25 Q. Just finally, with the contractor guards so the guards

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1 for the other contracting sites, if I can put it that
 2 way, who was responsible for those guards pre the change
 3 over first of all to SSI?
 4 **A. The individual companies would be responsible, so the**
 5 **individual contractor companies would be responsible for**
 6 **their own guards.**
 7 Q. And there was no connection of those guards into your
 8 management?
 9 **A. No, there wasn't. Just emergency response, that's all.**
 10 Q. I assume it follows then when SSI took over that didn't
 11 change?
 12 **A. No.**
 13 MS GERRY: I have no further questions, thank you very much.
 14 THE CORONER: We'll break off there.
 15 Mr Fitzpatrick, it has been a long day for you.
 16 Sorry about that. But I think you are coming back to
 17 help us on another occasion, aren't you, to finish off;
 18 did you know that?
 19 **A. The 30th I think.**
 20 THE CORONER: All right. But thank you very much.
 21 So we'll break off there. In fact, I can't start
 22 until 10.30 tomorrow morning so that will slightly make
 23 up for the late finish. 10.30 tomorrow.
 24 (5.15 pm)
 25 (The inquest adjourned until the following day at 10.30 am)

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